National Environmental Policy Act
Scoping Report
Honolulu High-Capacity Transit Corridor Project

May 30, 2007

Prepared for:
City and County of Honolulu

Prepared by:
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Table of Contents

List of Tables

Chapter 1 Introduction

The City and County of Honolulu Department of Transportation Services (DTS), in cooperation with the U.S. Department of Transportation Federal Transit Administration (FTA), will be preparing an Environmental Impact Statement (EIS) to evaluate alternatives that would provide high-capacity transit service on Oʻahu. The primary project study area is the travel corridor between Kapolei and the University of Hawaiʻi at Mānoa (UH Mānoa).

The notice of intent to prepare the EIS appeared in the *Federal Register* on March 15, 2007. The EIS will be prepared to satisfy the requirements of the National Environmental Policy Act of 1969 (NEPA) and its implementing regulations and Chapter 343 of the Hawaiʻi Revised Statutes. The FTA and DTS requested public and interagency input on the purpose of and needs to be addressed by the project, the alternatives to be considered, and the scope of the NEPA EIS for the project, including the environmental and community impacts to be evaluated. The scoping comment period under NEPA officially began on the date of the Federal Register publication and closed on April 12, 2007.

Scoping activities related to the Hawaiʻi Revised Statutes Chapter 343 process were completed in December 2005 and January 2006. Those activities are summarized in the *Honolulu High-Capacity Transit Corridor Project Scoping Report* dated April 6, 2006. Comments and issues raised during the Chapter 343 scoping process that have not already been addressed during the planning Alternatives Analysis for the project will be addressed in the Environmental Impact Statement, in addition to issues noted during the NEPA scoping process.

DTS completed a planning Alternatives Analysis in October 2006 that evaluated the four following alternatives to provide high-capacity transit service in the travel corridor between Kapolei and UH Mānoa:

- No Build
- Transportation System Management
- Express Buses operating in Managed Lanes
- Fixed Guideway Transit System

After review of the *Alternatives Analysis Report* and consideration of public comments, the City and County of Honolulu Council selected a Locally Preferred Alternative (LPA) on December 22, 2006. The decision was signed into law by the Mayor on January 6, 2007, becoming Ordinance 07-001, selected a fixed guideway transit system extending from Kapolei to UH Mānoa with a connection to Waikīkī. The ordinance authorizes the City to proceed to planning and engineering of a fixed guideway project within these limits and following the alignment defined in the ordinance. Also, the First Project was directed to be fiscally constrained to anticipated funding sources. City Council Resolution 07-039 defined the First Project as extending from East Kapolei to Ala Moana Center via Salt Lake Boulevard.

All interested individuals and organizations, and federal, state, and local agencies were invited to comment on the purpose of and needs to be addressed by the project; the alternatives, including the modes and technologies to be evaluated and the alignments and termination points to be considered; and the environmental, social, and economic impacts to be analyzed. An opportunity to express a preference for a particular alternative will be available after the release of the draft EIS, which compares various alternatives.

Public scoping meetings were announced in the notice of intent and were held at two locations within the study corridor. A third public meeting to provide information and collect comments was added at the public's request. The meetings were conducted in an open-house format that presented the purpose of and needs for the project, proposed project alternatives, and the scope of analysis to be included in the EIS. The meetings allowed members of the public to ask questions of project staff and provided an opportunity for the public to present either written testimony or oral testimony, recorded by court reporters.

The first scoping meeting was held at Kapolei Hale at 1000 Uluohia Street, Honolulu, HI 96707 on March 28, 2007, from 6:00 p.m. to 9:00 p.m. and was attended by approximately 40 people. The second meeting was held at McKinley High School at 1039 South King Street, Honolulu, HI 96814 on March 29, 2007, from 5:00 p.m. to 8:00 p.m. and was attended by approximately 75 people. The third meeting was held at Salt Lake Elementary School at 1131 Ala Liliko'i Street, Honolulu, HI 96818 on April 3, 2007, from 5:00 p.m. to 8:00 p.m. and was attended by approximately 25 people.

The public scoping meetings were supplemented with an agency scoping meeting targeted to those Federal, State, and County agencies potentially interested in the project. The agency scoping meeting was held at Honolulu Hale, Mission Memorial Auditorium at 550 South King Street, Honolulu, HI 96813 on March 28, 2007, from 10:00 a.m. to 12:00 p.m. and was attended by approximately 20 individuals from agencies and utility companies.

Following closure of the public scoping process, continued public outreach activities will include meetings with interested parties or groups. The project website, www.honolulutransit.org, will be periodically updated to reflect the project's current status. Additional opportunities for public participation will be announced through mailings, notices, advertisements, and press releases. Anyone may be placed on the project mailing list by registering on the website at www.honolulutransit.org or by calling (808) 566-2299.

Chapter 2 Outreach Efforts

The project scoping meetings were publicized through newsletter mailings, website and phone-line information, newspaper advertisements, and news service coverage. No requests were received for materials or presentations in any language except English.

Newsletters were mailed to approximately 15,000 addresses.

Legal advertisements were placed in the Honolulu Star-Bulletin on March 16, 21, 22, and 23, 2007.

The Scoping Meetings received substantial media notice and coverage, including stories on local television news and in the Honolulu Star-Bulletin.

The project website was updated on March 15, 2007, with the scoping information package and meeting notices. The website also provided a form to submit scoping comments.

Chapter 3 Notice of Intent

DEPARTMENT OF TRANSPORTATION

Federal Transit Administration

Intent to Prepare an Environmental Impact Statement for High-Capacity Transit Improvements in the Leeward Corridor of Honolulu, Hawai'i

AGENCY: Federal Transit Administration, DOT.

ACTION: Notice of Intent to prepare an Environmental Impact Statement (EIS).

SUMMARY: The Federal Transit Administration (FTA) and the City and County of Honolulu, Department of Transportation Services (DTS) intend to prepare an EIS on a proposal by the City and County of Honolulu to implement a fixed-guideway transit system in the corridor between Kapolei and the University of Hawai'i at Mānoa with a branch to Waikīkī. Alternatives proposed to be considered in the draft EIS include No Build and two Fixed Guideway Transit alternatives.

The EIS will be prepared to satisfy the requirements of the National Environmental Policy Act of 1969 (NEPA) and its implementing regulations. The FTA and DTS request public and interagency input on the purpose and need to be addressed by the project, the alternatives to be considered in the EIS, and the environmental and community impacts to be evaluated.

DATES: *Scoping Comments Due Date*: Written comments on the scope of the NEPA review, including the project's purpose and need, the alternatives to be considered, and the related impacts to be assessed, should be sent to DTS by April 12, 2007. See **ADDRESSES** below.

Scoping Meetings: Meetings to accept comments on the scope of the EIS will be held on March 28 and 29, 2007 at the locations given in **ADDRESSES** below. On March 28, 2007, the public scoping meeting will begin at 6:30 p.m. and continue until 9:00 p.m. or until all who wish to provide oral comments have been given the opportunity. The meeting on March 29, 2007, will begin at 5:00 p.m. and continue until 8:00 p.m. or until all who wish to provide oral comments have been given the opportunity. The locations are accessible to people with disabilities. A court reporter will record oral comments. Forms will be provided on which to submit written comments. Project staff will be available at the meeting to informally discuss the EIS scope and the proposed project. Governmental agencies will be invited to a separate scoping meeting to be held during business hours. Further project information will be available at the scoping meetings and may also be obtained by calling (808) 566-2299, by downloading from www.honolulutransit.org, or by e-mailing info@honolulutransit.org.

ADDRESSES: Written comments on the scope of the EIS, including the project's purpose and need, the alternatives to be considered, and the related impacts to be assessed, should be sent to the Department of Transportation Services, City and County

of Honolulu, 650 South King Street, 3rd Floor, Honolulu, HI, 96813, Attention: Honolulu High-Capacity Transit Corridor Project, or by the internet at www.honolulutransit.org.

The scoping meetings will be held at Kapolei Hale at 1000 Uluohia Street, Kapolei, HI 96707 on March 28, 2007, from 6:30 p.m. to 9:00 p.m. and at McKinley High School at 1039 South King Street, Honolulu, HI 96814 on March 29, 2007, from 5:00 p.m. to 8:00 p.m.

FOR FURTHER INFORMATION CONTACT: Ms. Donna Turchie, Federal Transit Administration, Region IX, 201 Mission Street, Room 1650, San Francisco, CA, 94105, Phone: (415) 744-2737, Fax: (415) 744-2726.

Supplementary Information

I. Background

On December 7, 2005, FTA and DTS issued a notice of intent to prepare an Alternatives Analysis followed by a separate EIS. The DTS has now completed the planning Alternatives Analysis and, together with FTA, is proceeding with the NEPA review initiated through this scoping notice.

The planning Alternatives Analysis, conducted in accordance with 49 United States Code (U.S.C.) §5309 as amended by the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) (Pub. L. 109-59, 119 Stat. 1144), evaluated transit alternatives in the corridor from Kapolei to the University of Hawai‘i at Mānoa and to Waikīkī. Four alternatives were studied, including No Build, Transportation System Management, Bus operating in a Managed Lane, and Fixed Guideway Transit. Fixed Guideway Transit was selected as the Locally Preferred Alternative. The planning Alternatives Analysis is available on the project’s Web site at www.honolulutransit.org. The Honolulu City Council has established a fixed-guideway transit system connecting Kapolei and University of Hawai‘i at Mānoa, with a branch to Waikīkī, as the locally preferred alternative. The O‘ahu Metropolitan Planning Organization (OMPO) has included construction of a rail transit system between Kapolei and the University of Hawai‘i at Mānoa and Waikīkī in the 2030 O‘ahu Regional Transportation Plan, April 2006.

II. Scoping

The FTA and DTS invite all interested individuals and organizations, and Federal, State, and local governmental agencies and Native Hawaiian organizations, to comment on the project’s purpose and need, the alternatives to be considered in the EIS, and the impacts to be evaluated. During the scoping process, comments on the proposed statement of purpose and need should address its completeness and adequacy. Comments on the alternatives should propose alternatives that would satisfy the purpose and need at less cost or with greater effectiveness or less environmental or community impact and were not previously studied and eliminated for good cause. At this time, comments should focus on the scope of the NEPA review and should not state a preference for a particular alternative. The best opportunity for that type of input will be after the release of the draft EIS.

Following the scoping process, public outreach activities with interested parties or groups will continue throughout the duration of work on the EIS. The project Web site, www.honolulutransit.org, will be updated periodically to reflect the status of the project. Additional opportunities for public participation will be announced through mailings, notices, advertisements, and press releases. Those wishing to be placed on the project mailing list may do so by registering on the Web site at www.honolulutransit.org, or by calling (808) 566-2299.

III. Description of Study Area

The proposed project study area is the travel corridor between Kapolei and the University of Hawai‘i at Mānoa (UH Mānoa) and Waikīkī. This narrow, linear corridor is confined by the Wai‘anae and Ko‘olau mountain ranges to the north (mauka direction) and the ocean to the south (makai direction). The corridor includes the majority of housing and employment on O‘ahu. The 2000 census indicates that 876,200 people live on O‘ahu. Of this number, over 552,000 people, or 63 percent, live within the corridor between Kapolei and Mānoa/Waikīkī. This area is projected to absorb 69 percent of the population growth projected to occur on O‘ahu between 2000 and 2030, resulting in an expected corridor population of 776,000 by 2030. Over the next twenty-three years, the ‘Ewa/Kapolei area is projected to have the highest rate of housing and employment growth on O‘ahu. The ‘Ewa/Kapolei area is developing as a “second city” to complement downtown Honolulu. The housing and employment growth in ‘Ewa is identified in the General Plan for the City and County of Honolulu.

IV. Purpose and Need

The purpose of the Honolulu High-Capacity Transit Corridor Project is to provide high-capacity, high-speed transit in the highly congested east-west transportation corridor between Kapolei and the University of Hawai‘i at Mānoa, as specified in the 2030 O‘ahu Regional Transportation Plan (ORTP). The project is intended to provide faster, more reliable public transportation services in the corridor than those currently operating in mixed-flow traffic, to provide basic mobility in areas of the corridor where people of limited income live, and to serve rapidly developing areas of the corridor. The project would also provide an alternative to private automobile travel and improve transit linkages within the corridor. Implementation of the project, in conjunction with other improvements included in the ORTP, would moderate anticipated traffic congestion in the corridor. The project also supports the goals of the O‘ahu General Plan and the ORTP by serving areas designated for urban growth.

The existing transportation infrastructure in the corridor between Kapolei and UH Mānoa is overburdened handling current levels of travel demand. Motorists and transit users experience substantial traffic congestion and delay at most times of the day, both on weekdays and on weekends. Average weekday peak-period speeds on the H-1 Freeway are currently less than 20 mph in many places and will degrade even further by 2030. Transit vehicles are caught in the same congestion. Travelers on O‘ahu’s roadways currently experience 51,000 vehicle hours of delay, a measure of how much time is lost daily by travelers stuck in traffic, on a typical weekday. This measure of delay is projected to increase to more than 71,000 daily vehicle hours of delay by 2030, assuming

implementation of all of the planned improvements listed in the ORTP (except for a fixed guideway system). Without these improvements, the ORTP indicates that daily vehicle-hours of delay could increase to as much as 326,000 vehicle hours.

Currently, motorists traveling from West O‘ahu to Downtown Honolulu experience highly-congested traffic conditions during the a.m. peak period. By 2030, after including all of the planned roadway improvements in the ORTP, the level of congestion and travel time are projected to increase further. Average bus speeds in the corridor have been decreasing steadily as congestion has increased. “TheBus” travel times are projected to increase substantially through 2030. Within the urban core, most major arterial streets will experience increasing peak-period congestion, including Ala Moana Boulevard, Dillingham Boulevard, Kalākaua Avenue, Kapi‘olani Boulevard, King Street, and Nimitz Highway. Expansion of the roadway system between Kapolei and UH Mānoa is constrained by physical barriers and by dense urban neighborhoods that abut many existing roadways. Given the current and increasing levels of congestion, a need exists to offer an alternative way to travel within the corridor independent of current and projected highway congestion.

As roadways become more congested, they become more susceptible to substantial delays caused by incidents, such as traffic accidents or heavy rain. Even a single driver unexpectedly braking can have a ripple effect delaying hundreds of cars. Because of the operating conditions in the study corridor, current travel times are not reliable for either transit or automobile trips. To get to their destination on time, travelers must allow extra time in their schedules to account for the uncertainty of travel time. This lack of predictability is inefficient and results in lost productivity. Because the bus system primarily operates in mixed-traffic, transit users experience the same level of travel time uncertainty as automobile users. A need exists to reduce transit travel times and provide a more reliable transit system.

Consistent with the General Plan for the City and County of Honolulu, the highest population growth rates for the island are projected in the ‘Ewa Development Plan area (comprised of the ‘Ewa, Kapolei and Makakilo communities), which is expected to grow by 170 percent between 2000 and 2030. This growth represents nearly 50 percent of the total growth projected for the entire island. The more rural areas of Wai‘anae, Wahiawā, North Shore, Waimānalo, and East Honolulu will have much lower population growth of between zero and 16 percent if infrastructure policies support the planned growth in the ‘Ewa Development Plan area. Kapolei, which is developing as a “second city” to Downtown Honolulu, is projected to grow by nearly 600 percent to 81,100 people, the ‘Ewa neighborhood by 100 percent, and Makakilo by 125 percent between 2000 and 2030. Accessibility to the overall ‘Ewa Development Plan area is currently severely impaired by the congested roadway network, which will only get worse in the future. This area is less likely to develop as planned unless it is accessible to Downtown and other parts of O‘ahu; therefore, the ‘Ewa, Kapolei, and Makakilo area needs improved accessibility to support its future growth as planned.

Many lower-income and minority workers live in the corridor outside of the urban core and commute to work in the Primary Urban Center Development Plan area. Many lower-income workers also rely on transit because of its affordability. In addition, daily parking

costs in Downtown Honolulu are among the highest in the United States, further limiting this population's access to Downtown. Improvements to transit capacity and reliability will serve all transportation system users, including moderate- and low-income populations.

V. Alternatives

The alternatives proposed for evaluation in the EIS were developed through a planning Alternatives Analysis that resulted in selection of a Fixed Guideway Transit Alternative as the locally preferred alternative (LPA). FTA and DTS propose to consider the following alternatives:

- Future No Build Alternative, which would include existing transit and highway facilities and planned transportation projects (excluding the proposed project) anticipated to be operational by the year 2030. Bus service levels consistent with existing transit service policies is assumed for all areas within the project corridor under the Future No Build Alternative.
- Fixed Guideway Alternatives, which would include the construction and operation of a fixed guideway transit system in the corridor between Kapolei and UH Mānoa with a branch to Waikīkī. The draft EIS would consider five distinct transit technologies: light rail transit, rapid rail transit, rubber-tired guided vehicles, a magnetic levitation system, and a monorail system. Comments on reducing the range of technologies under consideration are encouraged. The draft EIS also would consider two alignment alternatives. Both alignment alternatives would operate, for the most part, on a transit-guideway structure elevated above the roadway, with some sections at grade. Both alignment alternatives generally follow the route: North-South Road to Farrington Highway/Kamehameha Highway to Salt Lake Boulevard to Dillingham Boulevard to Nimitz Highway/Halekauwila Street. Both alignment alternatives would have a future extension from downtown Honolulu to UH Mānoa with a future branch to Waikīkī, and a future extension at the Wai‘anae (western) end to Kalaeloa Boulevard in Kapolei. The second alignment alternative would have an additional loop created by a fork in the alignment at Aloha Stadium to serve Honolulu International Airport that would rejoin the main alignment in the vicinity of the Middle Street Transit Center. The first construction phase for either of the Fixed Guideway Alternatives is currently expected to begin in the vicinity of the planned University of Hawai‘i West O‘ahu campus and extend to Ala Moana Center via Salt Lake Boulevard. The Build Alternatives also include the construction of a vehicle maintenance facility, transit stations and ancillary facilities such as park-and-ride lots and traction-power substations, and the modification and expansion of bus service to maximize overall efficiency of transit operation.

Other reasonable alternatives suggested during the scoping process may be added if they were not previously evaluated and eliminated for good cause on the basis of the Alternatives Analysis and are consistent with the project's purpose and need. The planning Alternatives Analysis is available for public and agency review on the project

Web site at www.honolulutransit.org. It is also available for inspection at the project office by calling (808) 566-2299 or by e-mailing info@honolulutransit.org.

VI. Probable Effects

The EIS will evaluate and fully disclose the environmental consequences of the construction and operation of a fixed guideway transit system on O'ahu. The EIS will evaluate the impacts of all reasonable alternatives on land use, zoning, residential and business displacements, parklands, economic development, community disruptions, environmental justice, aesthetics, noise, wildlife, vegetation, endangered species, farmland, water quality, wetlands, waterways, floodplains, hazardous waste materials, and cultural, historic, and archaeological resources. To ensure that all significant issues related to this proposed action are identified and addressed, scoping comments and suggestions on more specific issues of environmental or community impact are invited from all interested parties. Comments and questions should be directed to the DTS as noted in the **ADDRESSES** section above.

VII. FTA Procedures

The EIS will be prepared in accordance with the National Environmental Policy Act of 1969 (NEPA), as amended, and its implementing regulations by the Council on Environmental Quality (CEQ) (40 CFR parts 1500-1508) and by the FTA and Federal Highway Administration ("Environmental Impact and Related Procedures" at 23 CFR part 771). In accordance with FTA regulation and policy, the NEPA process will also address the requirements of other applicable environmental laws, regulations, and executive orders, including, but not limited to: Federal transit laws [49 USC 5301(e), 5323(b), and 5324(b)], Section 106 of the National Historic Preservation Act, Section 4(f) ("Protection of Public Lands") of the U.S. Department of Transportation Act (49 U.S.C. §303), Section 7 of the Endangered Species Act, and the Executive Orders on Environmental Justice, Floodplain Management, and Protection of Wetlands.

Dated: March 12, 2007

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Leslie T. Rogers
Regional Administrator

Chapter 4 Agency Scoping

Notification of Agency Scoping Meeting

The agency scoping meeting was held to provide an opportunity for those agencies potentially interested in the project, or having relevant expertise pertaining to the project, to have input at an early stage. Invitation letters were sent between March 16 and March 19, 2007, to Federal, State and County agencies and utility companies that had either participated in prior transit planning efforts on O'ahu or had responsibilities or expertise that were considered to play a role in the current transit planning program. Under the provisions of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) Section 6002, a coordination plan and an invitation to participate in the project were sent to the agencies listed in Table 4-1. Other parties that received invitations to the agency scoping meeting are shown in Table 4-2. Twenty individuals from the agencies noted in Table 4-1 and Table 4-2 attended the meeting.

Summary of Agency Scoping Meeting

The agency scoping meeting was held from 10:00 a.m. to 12:00 p.m. on March 28 2007, at Honolulu Hale, Mission Memorial Auditorium. Twenty agencies and utility companies attended the scoping meeting. Table 4-1 and Table 4-2 provide information about the agencies invited to the scoping meeting, those who attended, those who provided scoping input, and those who requested further consultation.

The meeting was recorded on a digital audio recorder, and notes of the discussions were taken. The meeting was moderated by the director of DTS and the project consulting team, and the presentation included the meeting purpose, introduction to the project, alternatives under consideration, planning process overview and schedule, and plans for public scoping. DTS stated that comments pertaining to purpose and need, alternatives, and scope of analysis would be particularly useful at this time.

Following the presentation, questions were requested. The subsequent discussion and written comments received from the agencies are summarized below.

Agency Scoping Questions and Responses

Questions were asked at the meeting related to three topics: right-of-way, air clearances, and security. The U.S. Army requested additional information and further consultation related to transit right-of-way needs across Fort Shafter military property. Subsequent to the meeting, a set of more detailed plans was sent to the U.S. Army Garrison-Hawai'i Department of Public Works.

Table 4-1. Agencies Invited to be Participating Agencies and their Status

Agency	Cooperating Agency Invitation	Participating Agency Invitation	Attended Scoping Meeting	Provided Scoping Comment
U.S. Department of Defense (U.S. Army Corps of Engineers)	X		X	X
U.S. Department of Defense (U.S. Army Garrison-Hawai‘i)	X		X	
U.S. Department of Defense (U.S. Naval Base Pearl Harbor)	X			
U.S. Department of Homeland Security (U.S. Coast Guard – 14th Coast Guard District)	X			
U.S. Department of Transportation, Federal Highway Administration	X			
State of Hawai‘i, Department of Transportation	X			X
U.S. Department of Agriculture (Natural Resources Conservation Service)		X		
U.S. Department of the Interior (Fish and Wildlife Service)		X		
U.S. Department of the Interior (National Park Service)		X		
U.S. Department of the Interior (U.S. Geological Survey Pacific Island Ecosystems Research Center)		X		
U.S. Department of Transportation, Federal Aviation Administration		X	X	X
U.S. Environmental Protection Agency		X		
U.S. Federal Emergency Management Agency		X		
State of Hawai‘i Department of Accounting and General Services		X	X	
State of Hawai‘i Department of Business, Economic Development, and Tourism		X		
State of Hawai‘i Department of Defense		X		
State of Hawai‘i Department of Education		X	X	
State of Hawai‘i, Department of Hawaiian Home Lands		X		*
State of Hawai‘i Department of Health		X	X	
State of Hawai‘i Department of Land and Natural Resources		X		
State of Hawai‘i, Department of Land and Natural Resources (State Historic Preservation Division)		X		
State of Hawai‘I, Hawai‘i Community Development Authority		X	X	*
State of Hawai‘i, Office of Environmental Quality Control		X		
State of Hawai‘i Office of Hawaiian Affairs		X		
State of Hawai‘i University of Hawai‘i		X	X	
O‘ahu Metropolitan Planning Organization		X	X	

* Agency did not submit individual comment, but did sign the East Kapolei Developers' comment letter.

Table 4-2. Agency Scoping Meeting Additional Invited Participants

Agency	Attended Scoping Meeting	Provided Scoping Comment
U.S. Department of Defense, U.S. Army Garrison-Hawai'i – Department of Public Works	X	
U.S. Department of Defense, U.S. Corps of Engineers – Pacific Ocean Division		
U.S. Department of Defense, U.S. Corps of Engineers – Honolulu District		
U.S. Department of Defense, U.S. Air Force – 15th CES Hickam AFB		
State of Hawai'i, Department of Transportation – Highways Division		
State of Hawai'i, Department of Transportation – Harbors Division		
State of Hawai'i, Department of Transportation – Airports Division		
State of Hawai'i Department of Health – Office of Planning		
State of Hawai'i Department of Health – Solid and Hazardous Waste Branch		
State of Hawai'i Department of Health – Noise, Radiation and Indoor Air Quality Branch		
State of Hawai'i Department of Health – Clean Water Branch		
State of Hawai'i Department of Health – Clean Air Branch		
State of Hawai'i Department of Land and Natural Resources – State Parks Division		
State of Hawai'i Department of Land and Natural Resources – Land Division		
State of Hawai'i Department of Land and Natural Resources – Commission on Water Resource Management		
State of Hawai'i Department of Business, Economic Development, and Tourism – Strategic and Industries Division		
State of Hawai'i Department of Business, Economic Development, and Tourism – Office of Planning		
Aloha Tower Development Corporation	X	
Legislative Reference Bureau		
State of Hawai'i University of Hawai'i at Mānoa	X	
State of Hawai'i University of Hawai'i at Mānoa – Hamilton Library		
State of Hawai'i University of Hawai'i at Mānoa – Water Resources Research Center		
State of Hawai'i University of Hawai'i – Facilities, Grounds, and Safety		
State of Hawai'i University of Hawai'i – Environmental Center		
State of Hawai'i University of Hawai'i West O'ahu	X	*
Leeward Community College	X	
Honolulu Community College	X	
Honolulu Board of Water Supply		
The Gas Company		
Hawaiian Electric Company, Inc.		X
Hawaiian Telecom		
Oceanic Time Warner Cable		

* Agency did not submit individual comment, but did sign the East Kapolei Developers' comment letter.

The FAA asked if runway clearance airspace limits had been checked for the airport alignment. They were told that the limits would be checked. Later review of project plans and Honolulu International Airport restrictions showed that the plans allow for sufficient clearances.

One subject of questions was related to security planning. FTA requires a security plan, which will be developed during system design and operational planning.

In its written comments, the U.S. Army Corps of Engineers informed the City that a permit may be required from the Corps to construct the project. Coordination will continue with the Corps to ensure that permitting requirements are met. Comments in other areas included the suggested change of the purpose and need to remove the reference to high-speed. The FTA and DTS believe that transit travel times comparable or better than driving times in the corridor are integral to the purpose of the project. Substantially slower transit travel times would be detrimental to the purpose of the project; therefore, the reference to transit speed remains in the Purpose and Need for the project.

The Corps' concerns about independent utility are noted; it is because of these concerns that the project being evaluated in the EIS includes not only the First Project, but also anticipated future extensions, to avoid artificial segmentation of the project in the decision-making process.

The Corps concerns related to aquatic resources and recommendations for data collection and impact analysis are appreciated and further coordination will be completed during preparation of the EIS.

The State of Hawai‘i Department of Transportation commented on two areas. One comment was that an alternative including an airport alignment should be included in the EIS. In response to this comment, a third build alternative is being added to the draft EIS that evaluates the airport alignment exclusively. Second, they requested evaluation of traffic impacts to State highways. Traffic conditions will be one of the elements evaluated during the EIS process.

Written comments received from agencies are provided in Appendix A-1.

Chapter 5 Public Scoping

Clarification of the Scoping Process

A number of commenters expressed confusion about the scoping process. First, the scoping process completed in January 2006 solicited comments on the project's Environmental Impact Preparation Notice (EISPN) and the purpose and need, alternatives, and scope of analysis for the Alternatives Analysis and the follow-on EIS. As stated in the Notice of Intent issued on March 15, 2007, that Notice of Intent superceded the one published on December 5, 2005.

As required by SAFETEA-LU Section 6002, input from the public has been sought regarding both the purpose and need, and the alternatives being evaluated. This input was initially sought during the planning Alternatives Analysis scoping period, and changes were made to the purpose and need at that time as documented in the *Honolulu High-Capacity Transit Corridor Project Scoping Report* dated April 6, 2006. The purpose and need was further refined after completion of the *Honolulu High-Capacity Transit Project Alternatives Analysis Report* and selection of the Locally Preferred Alternative; therefore, the public was again asked to provide comments on the purpose and need during the NEPA scoping period.

Scoping meetings are not intended to be public hearings to express preferences about a project. As stated in the Notice of Intent, comments should focus on the scope of the NEPA review and should not state a preference for a particular alternative. The scoping meetings were designed to maximize the potential to collect information pertinent to the completion of the EIS, while minimizing the demands on the public's time spent listening to information not relevant to their concerns or to the scoping process.

Summary of Public Comments

During the NEPA scoping comment period, 104 comment submissions were received via mail, the website, and the scoping meetings. Comments received from local organizations are provided in Appendix A-2, comments from businesses are in Appendix A-3, and comments received from the general public are provided in Appendix A-4. Correspondence that only requested placement on the mailing list are not included in this report. Comments that focus on a preference for alternatives that have previously been evaluated and eliminated from consideration are included in the appendices to this report but are neither summarized nor considered. No new alternatives to a fixed-guideway transit system that would meet the project's purpose and need and that were not previously considered and eliminated were identified during the scoping process. Information on previously considered alternatives is available in the *Honolulu High-Capacity Transit Project Alternatives Analysis Report.* Questions pertaining to the selection of the Fixed Guideway Alternative as the Locally Preferred Alternative relative to other alternatives evaluated were addressed in the *Honolulu High-Capacity Transit Project Summary of City Council Hearings Testimony,* and are not repeated in this report.

Likewise, comments on taxation that are not specific to the financial plan for the project and the decision making process by the City Council, as established in the City Charter, are neither summarized nor considered in this report, but have been included in the appendices. Similarly, comments focused on the O‘ahu 2030 Regional Transportation Plan, highway operation, and ferry service are outside of the scope and authority of the transit project and are not addressed.

Comments that relate to process, presentation materials, and website design have been included in the appendices, as well as reviewed and considered, but are not summarized or responded to in this report.

The majority of comments received related to a preference for one of the alternatives or a proposed modification to one of the alternatives.

Substantive Comments on Purpose and Need, Alternatives, and Scope of Analysis

Comments Related to Purpose and Need

Comments were received that the purpose and need statement should be expanded to address traffic congestion and highway capacity for private automobiles. The Honolulu High-Capacity Transit Corridor Project is evaluating one aspect of island-wide transportation needs in coordination with the OMPO, which is responsible for integrated transportation planning. The Honolulu High-Capacity Transit Corridor Project analysis is meant to evaluate project alternatives that may be constructed within the authorization of Act 247, enacted by the Hawai‘i State Legislature in 2005. The act prohibits the construction of a non-transit project with the authorized excise-tax surcharge. Projects with the purpose of providing roadway mobility for automobiles and commercial vehicles are not fundable by Act 247; therefore, they will not be added to the purpose of the Honolulu High-Capacity Transit Corridor Project. All projects relating to commercial or private automobile mobility included in the O‘ahu 2030 Regional Transportation Plan were included in all alternatives evaluated in the Alternatives Analysis process and will be included in all alternatives evaluated in the EIS. The purpose of the project reflects that a high-capacity transit system would reduce congestion compared to the No Build Alternative, but cannot be expected to reduce congestion to the extent that automobile traffic would flow freely in the corridor at all times.

Comments Related to Alternatives

The majority of substantive public comments related specifically to the proposed alternatives. Several comments suggested reconsideration of previously eliminated alternatives. Comments and questions on this topic reflected issues already addressed in the *Honolulu High-Capacity Transit Corridor Project Summary of City Council Hearings Testimony*, and are not repeated in this report.

Several comments were received on which portion of the Locally Preferred Alternative should be constructed first. The most-frequent suggestion was that the airport alignment should be constructed as opposed to the Salt Lake Boulevard alignment. In response to

this comment, a third build alternative is being added to the draft EIS that evaluates the airport alignment exclusively. Suggestions also were made to construct the sections to UH Mānoa and Waikīkī prior to other portions of the corridor. These issues were addressed during City Council selection of the First Project. First, no sites are available in the Koko Head end of the study corridor to provide a required maintenance and storage facility. Second, the Koko Head end of the corridor, without the complementary benefits provided by including the ʻEwa end of the corridor, has a higher cost per user benefit than the proposed First Project; therefore, transit riders would receive fewer benefits from UH Mānoa and Waikīkī service than from the proposed First Project at the same fixed construction cost. Both UH Mānoa and Waikīkī service are included in all fixed guideway alternatives that will be evaluated in the EIS.

One comment suggested providing additional bus service with either school buses or private vehicles. These options represent variations on the Transportation System Management Alternative evaluated in the *Honolulu High-Capacity Transit Corridor Project Alternatives Analysis Report*. They would provide additional bus capacity using different vehicles or limited only to certain times of day compared to what was evaluated in the Transportation System Management Alternative, but would not differ structurally from that alternative. These options would not provide substantial benefit compared to the Transportation System Management Alternative already evaluated; therefore, they are not being advanced for analysis in the EIS.

Comments relating to station location, design, and community integration will be considered during preliminary engineering and their environmental effects addressed in the EIS. These comments include such issues as parking availability, station access, and bus transfer facilities.

Comments were received in favor of monorail, light rail, and rapid rail. Selecting a technology that allows for a narrow low-profile guideway was suggested. No information was received that would eliminate one or more of the transit technologies currently under consideration.

Several comments suggested policy changes related to the relocation of jobs at the University of Hawaiʻi, limiting car ownership, changing development patterns through tax incentives, restricting parking, mandating carpools, congestion pricing, requiring all students to bus to school, restricting deliveries to nighttime hours, and limiting the number of people who may move to Oʻahu. These proposals and other policies mentioned are outside the purpose of providing a high-capacity transit system.

Several commenters suggested shifting the Waiʻanae end of the corridor into ʻEwa. An alignment on Fort Weaver Road was evaluated, documented, and eliminated in the *Honolulu High-Capacity Transit Corridor Project Alternatives Analysis Report.* Extending the First Project further Waiʻanae by one additional station also was suggested. This will be considered during preliminary engineering if a funding source is identified to provide the additional station and guideway.

One commenter suggested shifting the Kona Street alignment to Kapiʻolani Boulevard. These alignments were previously reviewed early in the Alternatives Analysis phase, and

Kapi'olani Boulevard was eliminated because of the lack of space for column placement, lack of suitable space for stations without substantial property acquisition, and the greater distance to bus transfers at Ala Moana Center.

One commenter suggested a High Speed Bus Alternative that would include aspects of both the Managed Lane Alternative that was eliminated during the planning alternatives analysis process and the Fixed Guideway Alternative. The concept was to construct an elevated roadway for the extent of the Fixed Guideway Alignment, provide wide passing zones at stations, and several access ramps. This alternative would be more costly and have more severe impacts to many elements of the environment because of its increased width, both for the entire length of the system as compared to the Fixed Guideway Alternative and substantial width approaching 100 feet at stations. These impacts would be similar to those of the Two-Direction Managed Lane Alternative described in the Alternatives Analysis but would extend for the entire length of the corridor from Kapolei to UH Mānoa. Substantial right-of-way would be required to accommodate the structure through urban Honolulu. In addition, right-of-way would be required for the additional proposed ramps. While the system could provide some additional transit user benefit by reducing the number of passenger transfers between the bus and fixed guideway system, this small benefit would be greatly off-set by the significant impacts of the alternative; therefore, the alternative is not being advanced for analysis in the EIS.

Comments Related to Scope of Analysis

A wide range of issues was identified for consideration in the analysis. No comments were received identifying previously unknown resources or hazards located along the proposed alignments of any of the alternatives. One commenter noted two sites on the National Register of Historic Places that were already identified during preparation of the *Honolulu High-Capacity Transit Project Historic and Archaeological Technical Report* to support the *Honolulu High-Capacity Transit Project Alternatives Analysis Report.*

Aesthetics and views were widely mentioned, including the effects of an elevated system, impacts on trees, and effects of advertising on the visual environment. Other concerns were raised about construction impacts and project phasing, noise impacts, right-of-way requirements and displacements, economic impacts, air quality, community connectivity, energy consumption and conservation options, emergency services and public safety, service to elderly and disadvantaged populations, natural resources, natural hazards, effects on land use and zoning, utility relocations, maintenance of traffic, and impacts to parks and recreational facilities. The identified topics of concern will all be evaluated in the EIS. Other issues of concern that were identified, but are not directly related to impacts on the environment, are the future financial and transportation performance of the system. As project development continues, the *Honolulu High-Capacity Transit Project Financial Plan* and *Honolulu High-Capacity Transit Project Transportation Impact Report* will be revised and summarized in the EIS.

Chapter 6 Conclusions

The goals of the scoping process were to establish the purpose of and the needs for the Honolulu High-Capacity Transit Corridor Project, identify the alternatives that should be evaluated for the project, and determine the scope of the analysis that will be conducted to support the EIS.

A purpose and need, list of alternatives, and list of topics to be evaluated that emerged from the planning Alternatives Analysis process were presented to the public and other interested parties. The comments received from members of the public and consulted agencies resulted in an addition to the alternatives being evaluated. A third fixed guideway alternative that would directly serve Honolulu International Airport will be included in the EIS.

Comments on transit technologies for the Fixed Guideway Alternatives (Alternatives 2 and 3) were reviewed; however, no information was received that would eliminate one or more of the transit technologies currently under consideration.

Comments received on the scope of the environmental analysis included concerns about such topics as noise, environmental justice, visual impacts, natural resources, energy, and displacements. The EIS will evaluate the effects of each alternative on each of the elements of the environment listed in the *Comments Related to Scope of Analysis* section in Chapter 5 of this report. The analysis will follow applicable U.S. Department of Transportation guidelines. Appropriate mitigation measures will be evaluated during preparation of the EIS.

Appendix A Scoping Comments

Appendix A-1: Agency NEPA Scoping Comments

TP202807

U.S. Department
of Transportation
**Federal Aviation
Administration**

Honolulu Control Facility
760 Worchester Avenue
Honolulu, HI 96818-5125

APR 9 10 19 AM '07
DTS
TRANS PLANNING

April 2, 2007

Mr. Kenneth Hamayasu
Chief, Transportation Planning Division
Department of Transportation Services
City and County of Honolulu
650 South King Street
3rd Floor
Honolulu, HI 96813

Dear Mr. Hamayasu:

We appreciate the opportunity to comment on the scope of the Environmental Impact Study process for the Honolulu High-Capacity Transit Corridor Project.

In our review of the scoping package, we have found that it does not include an airspace analysis for potential environmental consequences. We ask that you consider the impact on the airspace in the vicinity of the Honolulu International Airport per 14 CFR 77. Of particular concern is the airport routing in Alternative 3. Based on the preliminary information that you have provided, the elevated track system has the potential for adverse impact on aircraft landing on runways 22R and 22L as well as on departing traffic from runways 4R and 4L.

Should you have any questions, please call Moses Akana at (808) 840-6135.

Sincerely,

Robert A. Rabideau
Air Traffic Manager
Honolulu Control Facility

TP 203767

DEPARTMENT OF THE ARMY
U. S. ARMY ENGINEER DISTRICT, HONOLULU
FT. SHAFTER, HAWAII 96858-5440

REPLY TO
ATTENTION OF

April 10, 2007

Office of the Chief
Regulatory Branch

Mr. Kenneth Hamayasu
Chief, Transportation Planning Division
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Dear Mr. Hamayasu:

This letter is in response to your March 16, 2007 written invitation requesting our participation in the National Environmental Policy Act (NEPA) public scoping process for the preparation of an Environmental Impact Statement (EIS) for the ***Honolulu High-Capacity Transit Corridor Project*** ("Project") located on the Island of O'ahu, Hawaii. Based on your correspondence, I understand the Federal Transit Administration (FTA) and the City and County of Honolulu, Department of Transportation Services (DTS) will jointly prepare an EIS for this proposal in accordance with NEPA implementing regulations (40 CFR §1500-1508) and pursuant to the State EIS Law (Chapter 343, Hawaii Revised Statutes). The proposed project would implement a fixed guideway transit system in the east-west transportation corridor between Kapolei and the University of Hawai'i at Mānoa with a branch to Waikiki. Alternatives to be considered in the draft EIS include the No Action/No Build and two fixed guideway transit alternatives: one via Salt Lake Boulevard and another serving the Honolulu International Airport plus Salt Lake.

As a Federal agency with jurisdiction by law, the U.S. Army Corps of Engineers (Corps) appreciates your efforts to seek our early involvement and obtain our technical input regarding aquatic resources. I want to take this opportunity to advise the FTA and DTS the proposed Project may require a Corps permit. Enclosed you will find a permit application form and a pamphlet that describes our regulatory program (Enclosure 1). In general, a Corps permit is required for:

a) Structures or work in or affecting "navigable waters of the United States" pursuant to Section 10 of the Rivers and Harbors Act (RHA) of 1899. Examples include, but are not limited to: 1) constructing a pier, revetment, bulkhead, jetty, aid to navigation, artificial reef or island, and any structures to be placed under or over a navigable water; 2) dredging, dredge disposal, filling and excavation;

b) The discharge of dredged or fill material into, including any redeposit of dredged material within, "waters of the United States" and adjacent wetlands pursuant to Section 404 of the Clean Water Act (CWA) of 1972. Examples

include, but are not limited to: 1) creating fills for residential or commercial development, placing bank protection, temporary or permanent stockpiling of excavated material, building road crossings, backfilling for utility line crossings and constructing outfall structures, dams, levees, groins, weirs, or other structures; 2) mechanized land clearing, grading which involves filling low areas or land leveling, ditching, channelizing and other excavation activities that would have the effect of destroying or degrading waters of the United States; 3) allowing runoff or overflow from a contained land or water disposal area to re-enter a water of the United States; 4) placing pilings when such placement has or would have the effect of a discharge of fill material; and

c) Any combination of the above.

In addition, my staff offers the following comments for your consideration as part of the Project's public scoping process. Our comments are provided pursuant to our regulatory authorities promulgated under Section 404 of the CWA and Section 10 of the RHA, and are based on information presented in the *EIS Scoping Information Package for the Honolulu High-Capacity Transit Corridor Project* (dated March 15, 2007), the *Alternatives Analysis Report* (dated November 1, 2006), and the *Notice of Intent to Prepare an EIS for High-Capacity Transit Improvements in the Leeward Corridor of Honolulu* (Federal Register, 72 FR 12254, dated March 2007).

Regulatory Scope

Based on Project maps/figures and our knowledge of existing aquatic resources within the transportation corridor study area, it appears the proposed Project could potentially affect jurisdictional waters of the U.S. As your EIS technical studies and fieldwork progress, we expect that site-specific information regarding the delineation of waters of the U.S. and the characterization of the extent/intensity of potential aquatic resource impacts will assist in defining the scope of the Corps' involvement. Moreover, an estimate of the impacts to waters of the U.S. will help establish the appropriate Department of Army (DA) authorization should the proposed Project, or any of its parts, be regulated under Section 10 of the RHA and/or Section 404 of the CWA. Generally speaking, a discharge of dredged or fill material into waters of the U.S. and/or work in Section 10 navigable waters of the U.S. that complies with the terms and conditions of our nationwide permits, may be authorized in a relatively streamlined timeframe. However, for an activity that does not meet the terms and conditions of our nationwide permits and/or results in more than minimal impacts to the aquatic environment, individually or cumulatively, may instead require review under a more rigorous permitting process (e.g., standard individual permit).

We strongly encourage FTA and DTS integrate all reasonable and practicable measures during the early development of alternatives to avoid and minimize adverse impacts on the aquatic environment to the maximum extent practicable. Ensuring the proposed Project avoids and minimizes impacts to waters of the U.S. will also facilitate future Corps regulatory compliance requirements.

Purpose and Need

Foremost, the transit service should be responsive to the needs of the population it serves. As Federal and State entities charged with transportation planning, funding and implementation, we give substantial deference to the expertise of FTA and DTS in determining the project needs and purpose(s) for this public transit project. We understand the planning level alternative analysis performed in accordance with SAFETEA-LU led to the identification of a Locally Preferred Alternative (LPA), namely a fixed guideway transit. In the *Alternatives Analysis Report*, the fixed guideway transit alternative considered five transit technologies and four different alignments with varying station locations and numbers, as well as distinct characteristics and environmental impacts. In this regard, the purpose and need statement should clearly describe the relevant factors considered in defining the need and what selection criteria were applied to eliminate certain alignments and other modal alternatives from further consideration. These factors and criteria should be substantiated with existing and future traffic/transit data, including but not limited to: ridership projections, including assumptions related to the projections; savings or reduction in vehicle miles traveled (VMT); savings or reduction in vehicle hours traveled (VHT) for a.m. and p.m. peak periods; and improvements to the volume to capacity (VC) ratio and level of service (LOS). In turn, the Project purpose statement must be articulated in such a manner as to ensure a reasonable range of alternatives can be formulated to address the identified transportation problems (needs).

Page 2-1 of the Project Scoping Information Package indicates the purpose of the project is "...to provide high-capacity, high-speed transit in the highly congested east-west transportation corridor between Kapolei and the University of Hawaii at Mānoa, as specified in the 2030 O'ahu Regional Transportation Plan (ORTP)". Since the goal is to provide efficient, reliable and effective movement of people between Kapolei and downtown Honolulu/University of Hawaii at Mānoa the inclusion of "high-speed" may arbitrarily or inappropriately narrow the range of practicable alternatives. We recommend you consider some minor modifications to the purpose statement to ensure the Federal NEPA and CWA processes are structured to evaluate a reasonable range of alternatives, which may include multi-modal solutions. By doing so would not preclude or otherwise affect the 2006 selection of your LPA or the City and County Council's adopted "Minimum Operable Segment" identified in Resolution 07-039 FD1(C). Rather, inclusion of other non-high-speed transit and modal alternatives may provide a clearer and sharper comparison between alternatives for NEPA purposes.

Existing and modeled traffic data from the 2006 Alternatives Analysis Report suggest the implementation of the LPA will not necessarily improve the LOS on most segments of the Interstate H-1 Freeway, including the high-occupancy vehicle and Zipper lanes, within the corridor study area (Tables 3-12 and 3-13, *Alternatives Analysis Report*). For instance, at screenline locations Kalauao Stream and Kapālama Canal the LOS will remain "F" under both the Future No Action Alternative and the 2030 Fixed Guideway Alternative. That being the case, the stated goal to "improve" existing conditions, or LOS, is somewhat misleading; rather, the peak-hour volumes and LOS for

future with- and without project conditions suggest there is a need to "provide an alternate means of movement" from Kapolei to Downtown Honolulu/UH at Mānoa. To this end, we agree the inclusion of the verbiage "...to provide high-capacity transit..." is appropriate, but again, caution the use of language that is unduly restrictive.

Similar to NEPA, the CWA Section 404 (b)(1) Guidelines (Guidelines) state that a project's purpose and need is a prerequisite to establishing the reasonable range of alternatives to be evaluated. For activities or projects that are subject to a standard individual permit review process, the statement of purpose for compliance with the Guidelines has two elements: the basic and the overall project purpose. The basic project purpose defines the project purpose in its most simplistic terms and is determined to establish whether a proposed action is water dependent. The overall project purpose is the basic project purpose in consideration of the general objectives of the applicant, cost, logistics, and existing technology. It provides for a more specific definition of the purpose and need of an applicant's project. The overall project purpose should be specific enough to define the FTA's and DTS's needs, but not so restrictive as to preclude all discussion of alternatives. As you may know, the overall project purpose is used for evaluating practicable alternatives under the Guidelines, which require that if the overall purpose of a project is practicably met through several alternatives, the Corps can only authorize the least environmentally damaging practicable alternative (LEDPA).

In light of the aforementioned, we strongly encourage adherence to the general principles and guidelines regarding the development of the Project's overall purpose within the regulatory context of Section 404 of the CWA.

Alternatives and NEPA Scope of Analysis

The Council on Environmental Quality (CEQ) regulations requires an EIS objectively and rigorously examine all reasonable alternatives to the proposal. Towards this end, the range of alternatives should include reasonable alternatives that are not within the jurisdiction of FTA and/or DTS, if they exist (40 CFR 1502.14). As a matter of policy, the range of alternatives and rigor of analysis should be proportional to the level of impacts. The NEPA analysis must pursue and disclose feasible and practicable opportunities for the avoidance and minimization of impacts on the aquatic environment. For projects that are individually reviewed by the Corps, this is important in demonstrating compliance with the substantive requirements of the Guidelines, as well as consistency with our public interest review process.

Paramount to our Section 404 permit decision-making process is that proposed transit technologies and alignments which exhibit the least overall adverse environmental harm are appropriately examined in the context of "practicability" [1], especially prior to being eliminated from further consideration. In other words, as alternatives are evaluated for their effectiveness in achieving the project purpose FTA and DTS should give equal consideration to the impacts on the aquatic ecosystem and other environmental concerns, such as Department of Transportation Act Section 4(f) concerns (e.g., public parks,

[1] "Practicability" as defined by 40 C.F.R. § 230.3(q)

recreational sites, wildlife refuges and historic sites), and select the alternative that would result in the least overall environmental harm. An alternative with fewer impacts to aquatic resources than the preferred alternative may only be eliminated by demonstrating it has other overriding significant environmental impacts (40 CFR 230.10(a)).

The nature of funding for this Project and its phased implementation over the planning horizon (i.e., future extensions and station locations), requires the Project alternatives be examined in the context of independent utility and the proper NEPA scope of analysis to avoid "piecemealing" the environmental analysis. Technical data regarding independent utility and the NEPA scope of analysis should be succinctly presented in the early stages of the EIS development. The Corps believes the environmental consequences resulting from construction of the "Minimal Operable Segment" and all planned extensions must be considered in the project-level EIS, particularly if the Project benefits, wholly or partially, are derived from one or more of these future extensions and station locations. More specifically, NEPA requires the Federal lead agency define the scope of analysis for an individual EIS based on consideration of three factors: 1) the *types of actions*, 2) the *types of alternatives*, and 3) the *types of impacts*. The three types of actions include:

a. *Connected actions*, which means closely related and are connected if they:
    i. Trigger other actions,
    ii. Cannot or will not proceed unless other actions are taken previously or simultaneously, or
    iii. Are interdependent parts of a larger action and depend on the larger action for their justification.
b. *Cumulative actions*, which when viewed with other proposed actions have cumulatively significant impacts and should therefore be discussed in the same impact statement.
c. *Similar actions*, which when viewed with other reasonably foreseeable or proposed agency actions, have similarities that provide a basis for evaluating their environmental consequences together, such as common timing or geography.

My staff therefore recommends the environmental review process adequately documents how the NEPA scope of analysis is defined and the range of alternatives is formulated.

Identification of Resources & Evaluation of Impacts to the Aquatic Environment

The Council on Environmental Quality (CEQ) requires the data and analyses in an EIS are commensurate with the importance of the impact (40 C.F.R. § 1502.15). Similarly, the Guidelines emphasize the level of documentation should reflect the significance and complexity of the discharge activity (40 C.F.R. § 230.6). In the context of the *Honolulu High-Capacity Transit Corridor Project*, the evaluation of project impacts should include relevant quantitative information pertaining to water resources that is coalesced in the main text of the draft EIS. These data must disclose the projected

direct, indirect and cumulative impacts (beneficial and detrimental) to the aquatic environment associated with each of the proposed alternatives in a comparative format.

An important distinction to keep in mind when evaluating the impacts, or "harm", to non-aquatic resources versus impacts to waters of the U.S., is that, for the former, the alternatives selection process evaluates reasonable and prudent alternatives based on the "net harm" after mitigation of the alternative. Conversely, Section 404 alternatives analyses, the evaluation of practicable alternatives must consider the impacts to waters of the U.S. that would result from the alternative before compensatory mitigation. That is, compensatory mitigation may not be used as a method to reduce environmental impacts in the evaluation of the LEDPA (Corps and U.S. EPA Memorandum of Agreement, 1990). These are important aspects of the environmental process to be cognizant of; specifically should the Project necessitate an individual Section 404 permit.

Direct Effects

The corridor study area is relatively large and encompasses some of the most densely populated areas on the Island of O'ahu. Consequently, many of the streams, wetlands and other aquatic resources occurring within the Project study area have been altered or disturbed by past and on-going urban development. As a consequence, these anthropogenic disturbances have, in many cases, diminished the functions and values of the aquatic resources. However, the study area does support streams and wetlands that remain relatively intact or ecologically sensitive and impacts to these areas could be deleterious.

We request the draft EIS, including any appropriate technical studies, identify the temporary and permanent impacts to waters of the U.S. In determining impacts, consideration should be given to the alignment right-of-way and transit structure, including piers and bridge structures; the location, design and overall footprint of disturbance for each transit station location, including associated parking structures; maintenance or emergency access points; and any other ancillary features that may result in the permanent or temporary loss of waters of the U.S. Temporary stream diversions and cofferdams used or employed during construction are also important to identify and include in the analysis of effects. Streambank protection or bank stabilization that may be necessitated by one or more of the transit alignments at water crossings should be similarly identified in the draft EIS.

Indirect Effects

Indirect impacts, including growth-inducing effects, must also be identified and evaluated in the draft EIS. The acknowledgment in the NOI and Scoping Information Package that Kapolei is fast becoming a "second city" and the that the Ewa Development Plan area is [unlikely] to "...develop as planned unless it is accessible to Downtown and other parts of O'ahu...to support its future growth..." reveals the importance for the EIS to evaluate the potential indirect and growth-inducing impacts on the natural environment as a result of the proposed Project. While it is likely that development in this area will

occur with or without the proposed Project, land use patterns, scheduling or timing of future development, and the nature and juxtaposition of such development may be influenced or caused by the proposed Project. In fact, national data and studies suggest VMT growth is often substantially affected by development patterns. As jobs and housing become increasingly segregated, there tends to be a corresponding increase in driving time and hence VMT. For this reason, it seems prudent to disclose how the *Honolulu High-Capacity Transit Corridor Project* may help to ameliorate this "urban sprawl" effect vis-à-vis its support of high density development. In the end, all reasonably identifiable indirect impacts, detrimental or beneficial, on the biological and physical environments should be disclosed in the EIS.

In some cases, permanent structures, such as bridges, over surface water resources have been found to negatively impact water quality and aquatic species by altering water temperatures and the type or presence of in-stream and streambank vegetation. Therefore, we recommend FTA and DTS identify any indirect and incremental shading effects that could be expected from new or expanded bridge structures associated with the proposed alternatives.

The overall health and integrity of the aquatic ecosystem depends largely on water quality, habitat vitality and diversity, and hydrologic processes. Therefore, the loss or degradation of waters of the U.S. must meaningfully consider these factors. Based on our regulations and policies, we place a high degree of importance on quantifying and characterizing the functional losses resulting from the discharge of dredged or fill material into waters of the U.S. Functions are the physical, chemical and biological attributes of a wetland/waters without regard to its importance to society. Examples of functions include flood storage, wildlife habitat, and grounder water recharge. Values are those wetlands/waters functions that generally are regarded as beneficial to society, such as recreation, aesthetics, and wildlife viewing. A functional assessment (FA) should determine which functions are performed by the wetlands/waters, the value of those functions, and how the Project will affect the continued performance of the identified functions. If a FA is deemed appropriate, the precise assessment methodology and rigor for characterizing the functions and values of aquatic resources should be determined in close consultation with the Corps. We suggest the EIS quantitatively and/or qualitatively address the anticipated functional losses to aquatic ecosystems to the extent appropriate and practicable. Factors to consider include changes to sedimentation (e.g., sediment transport, in-stream aggradation and degradation), erosion, turbidity, hydrologic regime, water quality, floodplain encroachment, invasive species, and other native habitat perturbations.

Cumulative Effects

The Council on Environmental Quality (CEQ) regulations define cumulative effect as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions" (40 CFR 1508.7). A critical principle is the consideration of past and present

projects as they relate to establishing the environmental baseline and disturbance thresholds for each relevant resource. That is, the cumulative effects analysis should be conducted within the context of resource, ecosystem, and human community thresholds—levels of stress beyond which the desired condition degrades. The magnitude and extent of the effect on a resource depends on whether the cumulative effects exceed the capacity of the resource to sustain itself and remain productive. Similarly, the natural aquatic ecosystem and the human community have maximum levels of cumulative effects that they can withstand before the desired conditions of ecological functioning and human quality of life deteriorate (CEQ, 1997).

To facilitate future decision-making, all reasonably foreseeable projects, private or public that are identified, programmed, funded or approved in regional planning documents should be carefully and fully considered as part of the cumulative impact analysis. Aside from the proposed Project, all connected and similar actions that could contribute to cumulative effects (beneficial or detrimental) must be appropriately considered in the draft EIS. The cumulative impacts analysis should evaluate both the temporal (time) and spatial (geographic) effects associated with each significant environmental resource category.

Mitigation and Sequencing

The NEPA requires a discussion of mitigation for adverse environmental impacts of alternatives, where mitigation is defined to include avoidance, minimization, restoration and creation of habitats. Section 404 of the CWA also requires consideration of practicable alternatives to avoid and minimize adverse environmental impacts, and further requires that these measures be exhausted before turning to restoration and creation of habitats. Since the proposed Project alternatives are likely to cross a number of streams, channels, and other aquatic resources, we advocate design features that would likely avoid or reduce the direct impacts to surface water resources. Both on-site (e.g., design features) and off-site (e.g., different alignments) options to avoid and minimize impacts to waters of the U.S. is important in terms of demonstrating that the Project has taken appropriate and practicable steps to minimize potential adverse impacts of the discharge on the aquatic ecosystem (40 C.F.R. 230.10(d)).

Mitigation is an important aspect of the review and balancing process on many DA permit applications. Consideration of mitigation should occur throughout the permit application review process. Mitigation generally falls into three categories:

1) Project modifications to minimize adverse impacts;
2) Further mitigation measures to satisfy legal requirements; and
3) Mitigation measures that result from the public interest review process.

For unavoidable adverse impacts, compensatory mitigation must be for significant resource losses that are specifically identifiable, reasonably likely to occur, and of importance to the human or aquatic environment. Further, all mitigation must be directly related to the impacts of the proposed Project, appropriate to the scope and degree of

those impacts, and reasonably enforceable. The Corps recommends FTA and DTS incorporate the general tenets of our Honolulu District Mitigation Guidelines (dated February 14, 2005), Regulatory Guidance Letter (RGL) 02-02, *Guidance on Compensatory Mitigation Projects for Aquatic Resource Impacts Under the Corps Regulatory Program Pursuant to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act of 1899*, and RGL 03-06 *Minimum Monitoring Requirements for Compensatory Mitigation Projects Involving the Aquatic Resources* in your conceptual mitigation planning. These RGLs can be found at www.usace.army.mil/cw/cecwo/reg/rglsindx.htm. We also strongly encourage FTA and DTS give appropriate credence to the Corps and U.S. Environmental Protection Agency's joint proposed rule for "Compensatory Mitigation for Losses of Aquatic Resources" (March 28, 2006, Federal Register 15520), which we anticipate could be finalized prior to completion of the *Honolulu High-Capacity Transit Corridor Project* EIS.

The Corps also encourages the FTA and DTS to pursue any and all mitigation planning opportunities afforded at this early stage of the environmental process by leveraging the resources of Federal, State, local and non-profit entities to help with watershed-wide identification of areas suitable for wetlands enhancement, restoration and/or in-perpetuity preservation, as deemed appropriate by the Project's preliminary impact analyses. The draft EIS should propose a meaningful suite of conceptual mitigation strategies that would avoid and minimize impacts and compensate for any unavoidable adverse impacts to aquatic resources. Possible compensatory mitigation strategies could include establishment of a mitigation bank or an in lieu fee agreement; on- and/or off-site land acquisition and restoration; and control or eradication of invasive species that would enable native species to re-colonize.

Data Needs

Disclosure of the degree and magnitude of impacts is necessary for soliciting meaningful public input as well as for making informed decisions. As a matter of efficacy, the *Honolulu High-Capacity Transit Corridor Project* draft EIS should include a summary of the major impacts to water resources with accompanying aerial or topographic maps of sufficient scale that geo-spatially illustrate the potential direct and indirect effects associated with the discharge of dredged or fill material into waters of the U.S.

Although not all-inclusive, the following list comprises a general overview of the potential data needs and analyses for identifying and assessing waters of the U.S. during the Project's environmental evaluation and EIS review process.

- A delineation of all wetlands, which could be affected by the proposed Project. The delineation must follow the procedures set forth in the 1987 Wetlands Delineation Manual and include the data support forms.
- A delineation of other waters of the U.S. as follows:
  - For tidal waters, the high tide line shall be determined as described at 33 C.F.R. § 328.3(d);

- For non-tidal waters, the ordinary high water mark shall be determined as described at 33 C.F.R § 328.3(e).

- All plant and animal taxa encountered during site visits;
- A detailed assessment of the functions and values of wetlands and other waters of the U.S.
- A detailed assessment of project impacts on special aquatic sites and other waters as follows:
  - A detailed description of the project impacts, including the type of impact (e.g., habitat removal, fragmentation, introduction of exotic species) and its magnitude. These effects must be evaluated in the appropriate local or regional context.
- A detailed purpose and need statement, coordinated with the appropriate agencies. It is noteworthy to mention the Corps is solely responsible for the final approval of the overall project purpose used to conduct the 404(b)(1) alternatives analysis.
- A feasibility study of candidate mitigation sites
- Maps showing the occurrences of all associated sensitive species that have been identified within the survey area in relation to project features, including federally listed endangered and threatened species and designated critical habitat.
  - The size of the population(s) in terms of numbers of individuals and habitat occupied
  - The portion of the population(s) to be directly affected by each project alternative
  - The portion of the population to be indirectly affected by each alternative
  - The amount of suitable habitat to be directly or indirectly affected under each alternative

Inter-agency Coordination

I commend your efforts to engage our agency early in your environmental process. At this stage, our primary regulatory responsibilities associated with the *Honolulu High-Capacity Transit Corridor Project* NEPA document are to provide guidance on CWA and RHA procedures, disclose substantive issues relating to the direct, indirect and/or cumulative effects on the aquatic environment, and identify data gaps or other informational needs for our regulatory process requirements. Depending on our scope of analysis, we would also expect to provide feedback at key milestones to ensure the decisions made around Section 404 of the CWA are adequately substantiated and documented.

The 1995 *NEPA/404 Integration Process Memorandum of Understanding* (MOU) for *Surface Transportation Projects in the State of Hawaii* may have utility with this proposed FTA/DTS transit project. The MOU establishes formal procedures for Federal regulatory and resource agencies to work collaboratively with the transportation lead agencies to streamline the environmental review process. Implementation of the MOU merger procedures have been found particularly helpful for large-scale surface transportation projects that are expected to adversely affect waters of the U.S. and other environmentally sensitive resources.

I recognize the importance this transit project has to the City and County of Honolulu and in particular, to the quality of life for the commuting public. Conceptually, the implementation of a fixed guideway transit system could result in substantial transportation benefits to the leeward communities and a net overall environmental benefit in terms of air quality, noise and socioeconomics when compared to other transportation improvement or modal options. For these reasons, I look forward to my staff working collaboratively with FTA, DTS, and other Federal, State and local agencies to ensure the purpose and needs of this project are met while avoiding and minimizing the adverse impacts to the aquatic environment to the maximum extent practicable. If you have any questions or need clarification on our comments, please feel free to contact Ms. Susan A. Meyer of my staff at (808) 438-2137 or susan.a.meyer@usace.army.mil.

Sincerely,

George P. Young, P.E.
Chief, Regulatory Branch

Enclosure

Copies Furnished (w/o encl):
Ms. Connell Dunning and Dr. Wendy Wiltse, U.S. Environmental Protection Agency
Mr. Michael Molina, U.S. Fish and Wildlife Service
Mr. John Naughton, NOAA, Fisheries
CEPOH-PP-C (Mr. Paul Mizue)

ENCLOSURE 1

Permit Application (ENG FORM 4345)
and
Regulatory Permit Program pamphlet

APPLICATION FOR DEPARTMENT OF THE ARMY PERMIT *(33 CFR 325)*	OMB APPROVAL NO. 0710-0003 Expires December 31, 2004

The public reporting burden for this collection of information is estimated to average 10 hours per response, although the majority of applications should require 5 hours or less. This includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Department of Defense, Washington Headquarters Service Directorate of Information Operations and Reports, 1215 Jefferson Davis Highway, Suite 1204, Arlington, VA 22202-4302; and to the Office of Management and Budget, Paperwork Reduction Project (0710-0003), Washington, DC 20503. Respondents should be aware that notwithstanding any other provision of law, no person shall be subject to any penalty for failing to comply with a collection of information if it does not display a currently valid OMB control number. Please DO NOT RETURN your form to either of those addresses. Completed applications must be submitted to the District Engineer having jurisdiction over the location of the proposed activity.

PRIVACY ACT STATEMENT

Authorities: Rivers and Harbors Act, Section 10, 33 USC 403; Clean Water Act, Section 404, 33 USC 1344; Marine Protection, Research, and Sanctuaries Act, Section 103, 33 USC 1413. Principal Purpose: Information provided on this form will be used in evaluating the application for a permit. Routine Uses: This information may be shared with the Department of Justice and other federal, state, and local government agencies. Submission of requested information is voluntary, however, if information is not provided, the permit application cannot be processed nor can a permit be issued.

One set of original drawings or good reproducible copies which show the location and character of the proposed activity must be attached to this application (see sample drawings and instructions) and be submitted to the District Engineer having jurisdiction over the location of the proposed activity. An application that is not completed in full will be returned.

(ITEMS 1 THRU 4 TO BE FILLED BY THE CORPS)

1. APPLICATION NO.	2. FIELD OFFICE CODE	3. DATE RECEIVED	4. DATE APPLICATION COMPLETED

(ITEMS BELOW TO BE FILLED BY APPLICANT)

5. APPLICANT'S NAME	8. AUTHORIZED AGENT'S NAME AND TITLE *(an agent is not required)*
6. APPLICANT'S ADDRESS	9. AGENT'S ADDRESS
7. APPLICANT'S PHONE NUMBERS WITH AREA CODE a. Residence b. Business	10. AGENT'S PHONE NUMBERS WITH AREA CODE a. Residence b. Business

11. **STATEMENT OF AUTHORIZATION**

I hereby authorize _____ to act in my behalf as my agent in the processing of this application and to furnish, upon request, supplemental information in support of this permit application.

_____

APPLICANT'S SIGNATURE DATE

NAME, LOCATION AND DESCRIPTION OF PROJECT OR ACTIVITY

12. PROJECT NAME OR TITLE *(see instructions)*

13. NAME OF WATERBODY, IF KNOWN *(if applicable)*	14. PROJECT STREET ADDRESS *(if applicable)*
15. LOCATION OF PROJECT COUNTY _____ STATE _____	

16. OTHER LOCATION DESCRIPTIONS, IF KNOWN (see instructions)

17. DIRECTIONS TO THE SITE

18. Nature of Activity *(Description of project, include all features)*

19. Project Purpose *(Describe the reason or purpose of the project, see instructions)*

USE BLOCKS 20-22 IF DREDGED AND/OR FILL MATERIAL IS TO BE DISCHARGED

20. Reason(s) for Discharge

21. Type(s) of Material Being Discharged and the Amount of Each Type in Cubic Yards

22. Surface Area in Acres of Wetlands or Other Waters Filled *(see instructions)*

23. Is Any Portion of the Work Already Complete? Yes _____ No _____ IF YES, DESCRIBE THE COMPLETED WORK

24. Addresses of Adjoining Property Owners, Lessees, etc., Whose Property Adjoins the Waterbody (if more than can be entered here, please attach a supplemental list).

25. List of Other Certifications or Approvals/Denials Received from other Federal, State, or Local Agencies for Work Described in This Application

AGENCY	TYPE APPROVAL*	IDENTIFICATION NUMBER	DATE APPLIED	DATE APPROVED	DATE DENIED

*Would include but is not restricted to zoning, building and flood plain permits

26. Application is hereby made for a permit or permits to authorize the work described in this application. I certify that the information in this application is complete and accurate. I further certify that I possess the authority to undertake the work described herein or am acting as the duly authorized agent of the applicant.

SIGNATURE OF APPLICANT _____ DATE _____ SIGNATURE OF AGENT _____ DATE _____

The application must be signed by the person who desires to undertake the proposed activity (applicant) or it may be signed by a duly authorized agent if the statement in block 11 has been filled out and signed.

18 U.S.C. Section 1001 provides that: Whoever, in any manner within the jurisdiction of any department or agency of the United States, knowingly and willfully falsifies, conceals, or covers up any trick scheme, or disguises a material fact or makes any false, fictitious or fraudulent statements or representations or makes or uses any false writing or document knowing same to contain any false, fictitious or fraudulent statements or entry, shall be fined not more than $10,000 or imprisoned not more than five years or both.

Instructions for Preparing a
Department of the Army Permit Application

Blocks 1 through 4. To be completed by Corps of Engineers.

Block 5. Applicant's Name. Enter the name of the responsible party or parties. If the responsible party is an agency, company, corporation, or other organization, indicate the responsible officer and title. If more than one party is associated with the application, please attach a sheet with the necessary information marked Block 5.

Block 6. Address of Applicant. Please provide the full address of the party or parties responsible for the application. If more space is needed, attach an extra sheet of paper marked Block 6.

Block 7. Applicant Telephone Number(s). Please provide the number where you can usually be reached during normal business hours.

Blocks 8 through 11. To be completed, if you choose to have an agent.

Block 8. Authorized Agent's Name and Title. Indicate name of individual or agency, designated by you, to represent you in this process. An agent can be an attorney, builder, contractor, engineer, or any other person or organization. Note: An agent is not required.

Blocks 9 and 10. Agent's Address and Telephone Number. Please provide the complete mailing address of the agent, along with the telephone number where he / she can be reached during normal business hours.

Block 11. Statement of Authorization. To be completed by applicant, if an agent is to be employed.

Block 12. Proposed Project Name or Title. Please provide name identifying the proposed project, *e.g.*, Landmark Plaza, Burned Hills Subdivision, or Edsall Commercial Center.

Block 13. Name of Waterbody. Please provide the name of any stream, lake, marsh, or other waterway to be directly impacted by the activity. If it is a minor (no name) stream, identify the waterbody the minor stream enters.

Block 14. Proposed Project Street Address. If the proposed project is located at a site having a street address (not a box number), please enter it here.

Block 15. Location of Proposed Project. Enter the county and state where the proposed project is located. If more space is required, please attach a sheet with the necessary information marked Block 15.

Block 16. Other Location Descriptions. If available, provide the Section, Township, and Range of the site and / or the latitude and longitude. You may also provide description of the proposed project location, such as lot numbers, tract numbers, or you may choose to locate the proposed project site from a known point (such as the right descending bank of Smith Creek, one mile downstream from the Highway 14 bridge). If a large river or stream, include the river mile of the proposed project site if known.

Block 17, Directions to the Site. Provide directions to the site from a known location or landmark. Include highway and street numbers as well as names. Also provide distances from known locations and any other information that would assist in locating the site.

Block 18. Nature of Activity. Describe the overall activity or project. Give appropriate dimensions of structures such as wingwalls, dikes (identify the materials to be used in construction, as well as the methods by which the work is to be done), or excavations (length, width, and height). Indicate whether discharge of dredged or fill material is involved. Also, identify any structure to be constructed on a fill, piles, or float-supported platforms.

The written descriptions and illustrations are an important part of the application. Please describe, in detail, what you wish to do. If more space is needed, attach an extra sheet of paper marked Block 18.

Block 19. Proposed Project Purpose. Describe the purpose and need for the proposed project. What will it be used for and why? Also include a brief description of any related activities to be developed as the result of the proposed project. Give the approximate dates you plan to both begin and complete all work.

Block 20. Reasons for Discharge. If the activity involves the discharge of dredged and/or fill material into a wetland or other waterbody, including the temporary placement of material, explain the specific purpose of the placement of the material (such as erosion control).

Block 21. Types of Material Being Discharged and the Amount of Each Type in Cubic Yards. Describe the material to be discharged and amount of each material to be discharged within Corps jurisdiction. Please be sure this description will agree with your illustrations. Discharge material includes: rock, sand, clay, concrete, etc.

Block 22. Surface Areas of Wetlands or Other Waters Filled. Describe the area to be filled at each location. Specifically identify the surface areas, or part thereof, to be filled. Also include the means by which the discharge is to be done (backhoe, dragline, etc.). If dredged material is to be discharged on an upland site, identify the site and the steps to be taken (if necessary) to prevent runoff from the dredged material back into a waterbody. If more space is needed, attach an extra sheet of paper marked Block 22.

Block 23. Is Any Portion of the Work Already Complete? Provide any background on any part of the proposed project already completed. Describe the area already developed, structures completed, any dredged or fill material already discharged, the type of material, volume in cubic yards, acres filled, if a wetland or other waterbody (in acres or square feet). If the work was done under an existing Corps permit, identity the authorization, if possible.

Block 24. Names and Addresses of Adjoining Property Owners, Lessees, etc.,Whose Property Adjoins the Project Site. List complete names and full mailing addresses of the adjacent property owners (public and private) lessees, etc., whose property adjoins the waterbody or aquatic site where the work is being proposed so that they may be notified of the proposed activity (usually by public notice). If more space is needed, attach an extra sheet of paper marked Block 24.

Information regarding adjacent landowners is usually available through the office of the tax assessor in the county or counties where the project is to be developed.

Block 25. Information about Approvals or Denials by Other Agencies. You may need the approval of other federal, state, or local agencies for your project. Identify any applications you have submitted and the status, if any (approved or denied) of each application. You need not have obtained all other permits before applying for a Corps permit.

Block 26. Signature of Applicant or Agent. The application must be signed by the owner or other authorized party (agent). This signature shall be an affirmation that the party applying for the permit possesses the requisite property rights to undertake the activity applied for (including compliance with special conditions, mitigation, etc.).

DRAWINGS AND ILLUSTRATIONS

General Information.

Three types of illustrations are needed to properly depict the work to be undertaken. These illustrations or drawings are identified as a Vicinity Map, a Plan View or a Typical Cross-Section Map. Identify each illustration with a figure or attachment number.

Please submit one original, or good quality copy, of all drawings on 8½ x11 inch plain white paper (tracing paper or film may be substituted). Use the fewest number of sheets necessary for your drawings or illustrations.

Each illustration should identify the project, the applicant, and the type of illustration (vicinity map, plan view, or cross-section). **While illustrations need not be professional (many small, private project illustrations are prepared by hand), they should be clear, accurate, and contain all necessary information.**

PENALTIES

Violation of pertinent laws may result in the following penalties:

* Removal of material and restoration

* Fines from $500 to $50,000 a day

* Imprisonment up to one year

PERMIT FEES

Fees shall be assessed as follows:

* Commercial or Industrial use - $100.00

* Non-commercial use - $10.00

Fees should not be submitted with permit application, but will be collected prior to issuance of the permit.

MAJOR COORDINATING AGENCIES

FEDERAL

US Environmental Protection Agency

U.S. Fish and Wildlife Service

National Marine Fisheries Service

Fourteenth Coast Guard District

STATE & LOCAL

State of Hawaii & various counties

Territories of Guam & American Samoa

~~Trust Territory of the Pacific Islands~~

Commonwealth of the Northern Mariana Islands

For Additonal information, contact:

U.S. Army Engineer District, Honolulu
Building 230
Fort Shafter Hawaii 96858-5440
Phone: (808)438-9258

HED PAM 1145-1-1

U.S. ARMY CORPS OF ENGINEERS

REGULATORY PERMIT PROGRAM

JULY 1998

INTRODUCTION

Under the laws of the United States, Congress has assigned to the U.S. Army Corps of Engineers certain non-military roles and functions. These include the better known traditional missions in navigation, flood control, hydropower production, water supply storage, and recreation. Congress has also given the Corps of Engineers certain regulatory responsibilities for work in the waters of the United States. The reasons for this are to (1) protect our nation's navigation channels and harbors against destruction and encroachments, and (2) restore and maintain environmental quality by regulating the discharge of dredged or fill material in coastal and inland waters and wetlands, construction and dredging in waters of the United States, and transportation of dredged material for dumping into ocean waters.

WHO IS REQUIRED TO OBTAIN A PERMIT?

Any individual, firm or agency (including Federal, State and local governmental agencies) who plans to do work in the waters of the United States must obtain a permit from the U.S. Army Corps of Engineers. In addition, permits, licenses, variances or other authorizations required by Federal, State or local laws and regulations must be obtained. Private ownership of the land beside or under the water has no effect on the requirement to obtain a permit.

PURPOSE

The permit program is designed to:

- Insure that our nation's water resources are safeguarded.
- Insure that our nation's water resources are used in the best interest of the people.
- Insure that environmental — social — economic concerns of the public are considered.

LAWS

The U.S. Army Corps of Engineers permit program is based primarily on the following Acts of Congress:

THE RIVER AND HARBOR ACT of 1899. Prohibits unauthorized construction in navigable waters of the United States.

THE FEDERAL WATER POLLUTION CONTROL ACT of 1972 (Public Law 92-500.) Governs disposal of dredged or fill material in waters of the United States.

THE MARINE PROTECTION, RESEARCH, AND SANCTUARIES ACT of 1972. Regulates transportation of dredged material for the purpose of dumping in ocean waters.

THE NATIONAL ENVIRONMENTAL POLICY ACT of 1969. States national policy to encourage productive and enjoyable harmony between man and his environment. Started Environmental Impact Statement requirement.

THE FISH AND WILDLIFE ACT of 1958. Requires the Corps to coordinate permit applications with State and Federal fish and wildlife agencies.

THE NATIONAL HISTORIC PRESERVATION ACT of 1966. Requires coordination on matters involving historic preservation.

THE COASTAL ZONE MANAGEMENT ACT of 1972. Requires compliance with State's coastal zone management program.

THE ENDANGERED SPECIES ACT of 1973. Requires coordination to insure that actions taken do not jeopardize the continued existence of endangered and threatened species.

TYPICAL ACTIVITIES REQUIRING PERMITS

The following types of activities in waters of the United States and wetlands may require a permit:

- Construction of piers, wharves, bulkheads, piling, marinas, docks, ramps, floats, mooring buoys, and like structures.
- Construction of wires and cables over the water, and pipes, cables or tunnels under the water.
- Dredging and excavation.
- Any obstruction or alteration of navigable waters.
- Depositing fill and dredged material.
- Filling of wetlands adjacent or contiguous to waters of the United States.
- Construction of riprap, revetments, groins, breakwaters, and levees.
- Transportation of dredged material for dumping into ocean waters.

WATERS OF THE UNITED STATES INCLUDE . . .

- Ocean waters.
- Coastal and inland waters, lakes, rivers, and streams that are navigable waters of the United States, including adjacent wetlands.
- Tributaries to navigable waters of the United States, including adjacent wetlands.
- Fishponds connected to navigable waters of the United States.
- All other waters of the United States, such as lakes, rivers and streams that are not interstate waters or tributaries to navigable waters of the United States, impoundments, perched wetlands, and intermittent streams, where the District Engineer determines that regulation is required to protect interstate commerce and the aquatic environment.

WETLANDS

- Certain unique pond systems
- Inland and coastal shallows
- Marshes
- Estuaries
- Swamps
- Other areas associated with coastal and inland waters of the United States.

PROCESSING PERMIT APPLICATIONS

Processing of permit applications includes:

- Publishing public notices and news releases.
- Seeking advice and comments of private organizations and general public.
- Conducting public hearings, as required.
- Preparing Environmental Impact Statements, as required.

CONSIDERATIONS

When studying a permit application, the factors listed below are considered:

- Conservation
- Economics
- Archaeological or Historic Values
- Water Quality
- Aesthetics
- Recreation
- Navigation
- Water Supply
- General Environmental Concerns
- Land Use Classification
- Needs and Welfare of the People
- Flood Damage Prevention
- Fish and Wildlife Values
- No permit will be granted unless its issuance is found to be in the public interest.

1035607

LINDA LINGLE
GOVERNOR

BARRY FUKUNAGA
INTERIM DIRECTOR

Deputy Directors
FRANCIS PAUL KEENO
BRENNON T. MORIOKA
BRIAN H. SEKIGUCHI

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

IN REPLY REFER TO:

HWY-PS
2.4145

APR 20 2007

RECEIVED
07 APR 25 P 2:18

Mr. Melvin N. Kaku
Director
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Dear Mr. Kaku:

Subject: Honolulu High-Capacity Transit Corridor Project
Scope of Environmental Impact Statement (EIS) for High-Capacity Transit Improvements in the Leeward Corridor of Honolulu, Hawaii

This letter is in response to the Federal Transit Administration notice published in the Federal Register on March 15, 2007.

Due to the amount of public interest expressed over the alignment of the minimum operating segment, we recommend the draft EIS include an evaluation of a fixed guideway transit alignment which directly serves Honolulu International Airport. We believe the draft EIS should also include comparisons of estimated ridership during the first year of service for the alternative route alignments as well as the impact and costs associated with rights-of-way acquisition of the various proposed route alternatives. Finally, we request that the draft EIS evaluate traffic conditions and recommend measures to address traffic impact at all locations where construction is proposed within the State highways rights-of-way.

Your consideration of these recommendations will allow for a more comprehensive and complete report.

Very truly yours,

BARRY FUKUNAGA
Interim Director of Transportation

c: Leslie Rogers, Federal Transit Administration - Region IX

CITY COUNCIL
CITY AND COUNTY OF HONOLULU
HONOLULU, HAWAII 96813-3065 / TELEPHONE 547-7000

ROMY M. CACHOLA
COUNCILMEMBER
(808) 547-7007
(808) 523-4220 (fax)
e-mail: rcachola@honolulu.gov

March 20, 2007

MEMORANDUM

TO: MR. MELVIN KAKU, DIRECTOR
DEPARTMENT OF TRANSPORTATION SERVICES

CC: MR. WAYNE HASHIRO
MANAGING DIRECTOR

FROM: COUNCILMEMBER ROMY M. CACHOLA

SUBJECT: MINIMUM OPERABLE SEGMENT

During the meeting with the Mayor and several members of the Aliamanu/Salt Lake/Foster Village Neighborhood Board No.18 (NB 18) on February 20, 2007, board member Mark Taylor provided the Mayor with maps showing four stations along the Salt Lake Boulevard alignment (see attached maps). These stations would put almost everyone within walking distance of a station and reduce or even eliminate the need for circulator buses in Salt Lake which, in turn, would cut down on operating and maintenance costs. Perhaps a fourth station could be worked out with Target, a prospective tenant at the former Costco site off Salt Lake Boulevard, at little or no cost to the City. This possible station at Pakini would also serve the civilian employees at the Navy Public Works complex and residents from the Aliamanu Military Reservation.

However, if four stations are not feasible, I strongly suggest that a third station be added. As you already know, Salt Lake Boulevard is approximately 4 miles in length and the distance between the two proposed stations is approximately 2.6 miles. The third station could then be situated near the Mapunapuna industrial area where it would serve the rest of the population as well as employees and employers in Mapunapuna.

Also, I strongly recommend moving the Ala Nioi Place station to a location just Ewa of the intersection of Salt Lake Boulevard/Radford Drive/Likini Place where it is flat. A station at this location would serve our military neighbors as well as our local residents.

I appreciate your positive consideration of my request and look forward to working with you to provide our residents with an alternative that would enhance their quality of life. Please provide me with the analysis of the proposed three or four stations along Salt Lake Boulevard, including ridership and costs. Also, please note that even with two additional stations at $20 million each, the Salt Lake Boulevard route remains cheaper than the Airport route.

Enclosures

cc: Aliamanu/Salt Lake/Foster Village Neighborhood Board No. 18 (w/o enclosures)

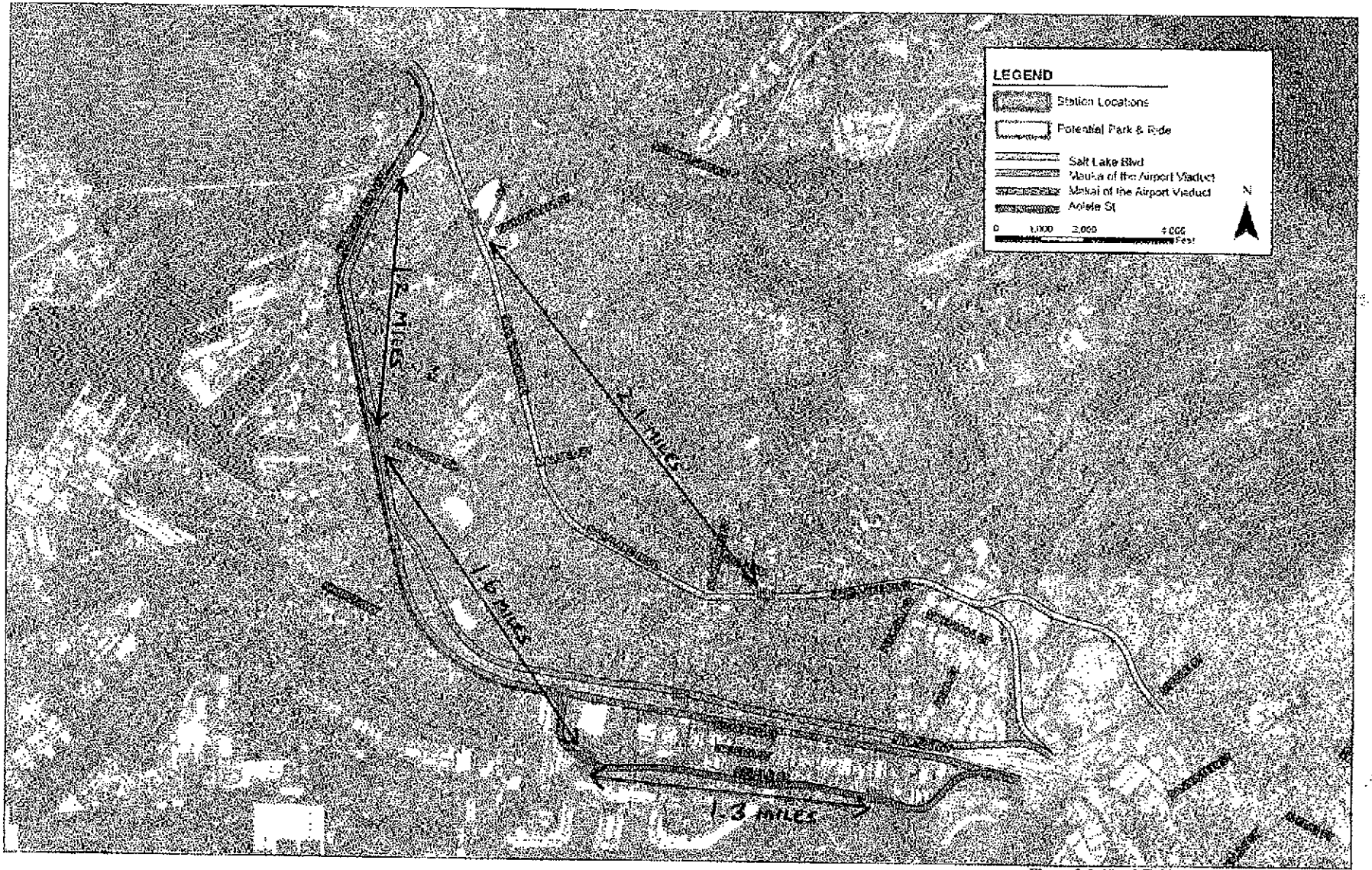


Figure 2-5. Fixed Guideway Alternative Section III

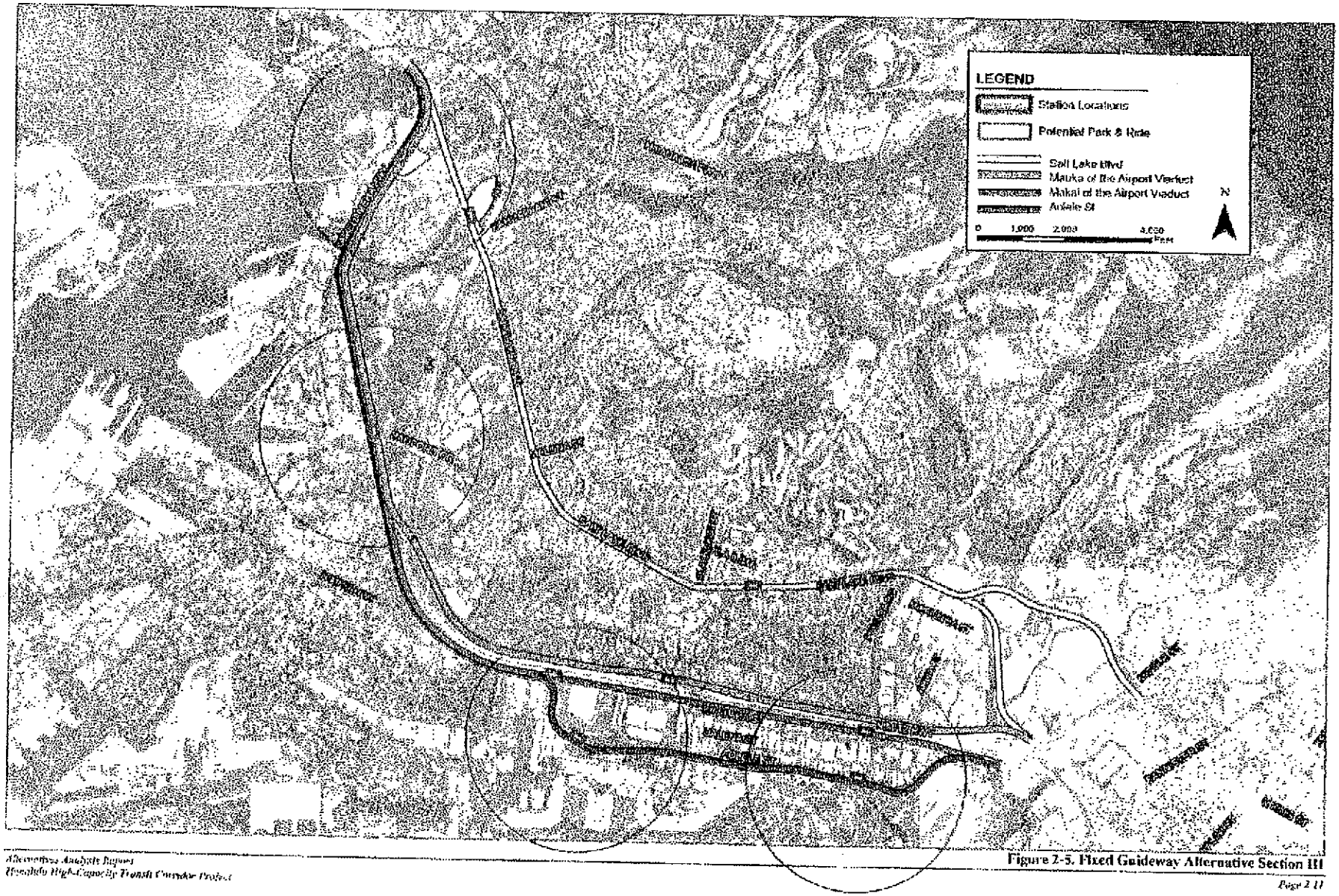


Figure 2-5. Fixed Guideway Alternative Section III

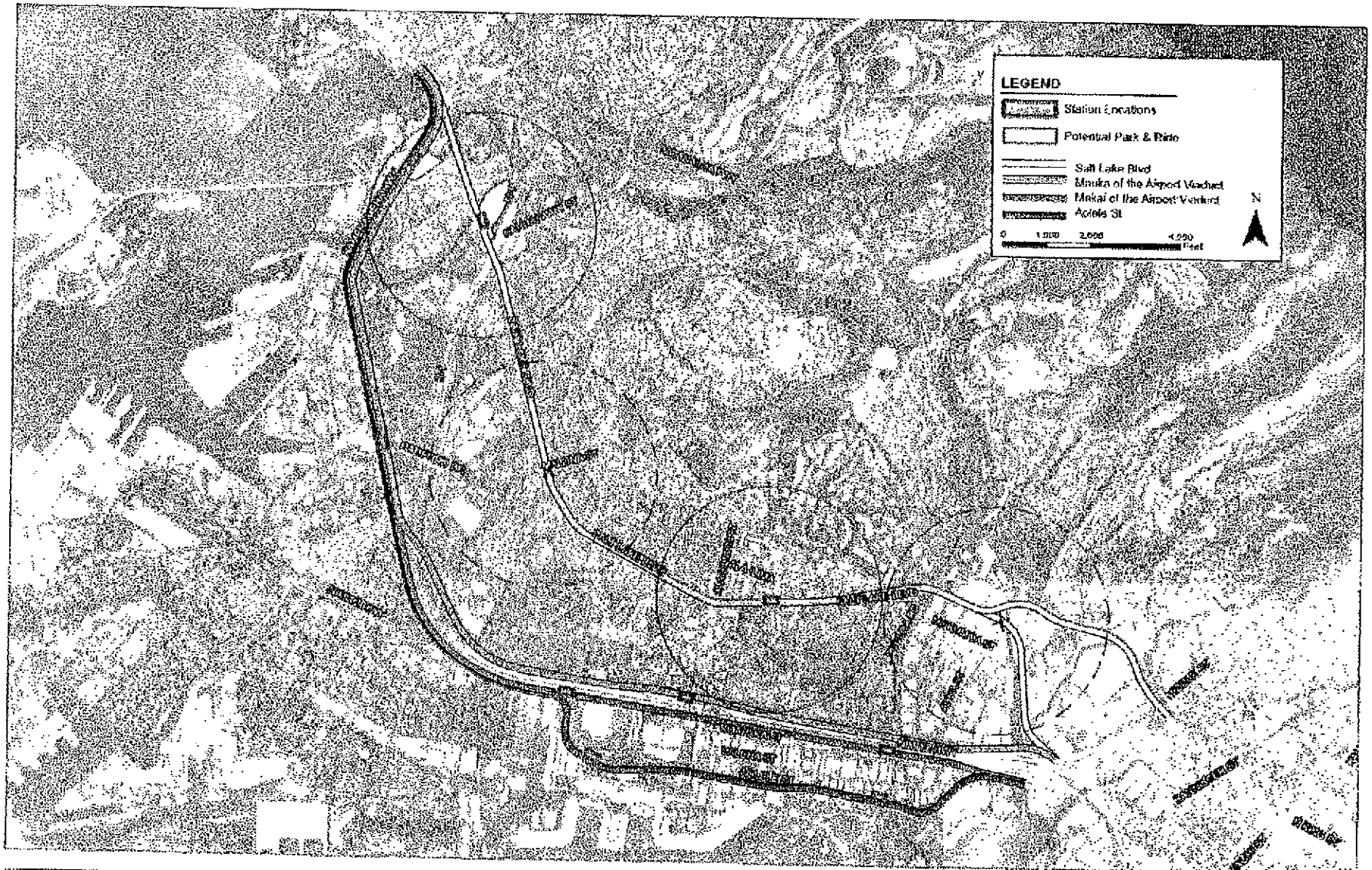


Figure 2-5. Fixed Guideway Alternative Section III

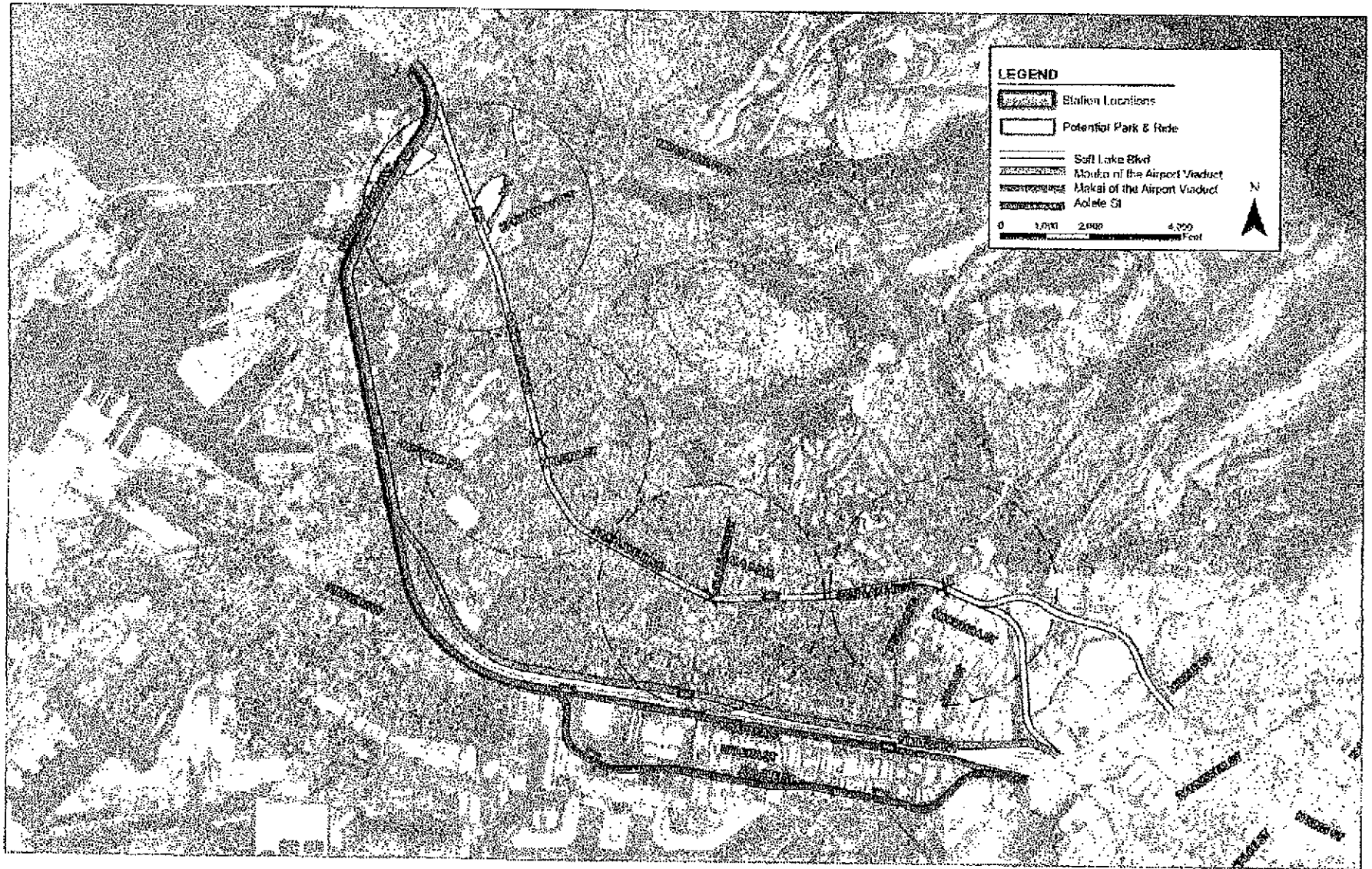


Figure 2-5. Fixed Guideway Alternative Section III

Appendix A-2: Organization NEPA Scoping Comments

Web Site Comment
www.honolulutransit.org

3/22/2007

FROM:
Michelle Matson
Waikiki Area Residents Association
3931 Gail Street
Honolulu, Hawai‘i 96815
MSMatson@hawaii.rr.com

COMMENT:
The instructions for your scoping process are very confusing in your newsletter, especially regarding "alternatives" as used in the context of route alignments, and then as technologies, and then "alignments (routes)" again. Which "alternatives" apply to which comment category in b) below?

The city's transit newsletter at http://www.honolulutransit.org states the following regarding the EIS: "The EIS WILL BE PREPARED to meet both state and federal requirements. On the federal level, the National Environmental Policy Act of 1969 (NEPA) and its implementing regulations are applicable. On the State level relevant law is found in Chapter 343 of the Hawaii Revised Statutes. "Two transit routes are proposed for analysis in the EIS. BOTH ALTERNATIVES encompass the full transit corridor described in the LPA, going from West Kapolei to the University of Hawaii at Manoa, and Waikiki. BOTH ALTERNATIVES also include the First Project (Minimum Operating Segment?) between East Kapolei and Ala Moana Center. ONE ALTERNATIVE follows Salt Lake Boulevard between Aloha Stadium and Middle Street, while THE OTHER ALTERNATIVE includes both Salt Lake Boulevard and Airport alignments..... "The public is invited to comment on the following: a) The purpose of and needs to be addressed by THE PROJECT; b) THE ALTERNATIVES (alternative routes as above, or alternative technologies?), including the technologies, to be evaluated; c) ALIGNMENTS (ROUTES) and termination points (West Kapolei, East Kapolei, Ala Moana Center, UH Manoa, Waikiki?) to be considered; and d) The environmental, social and economic impacts to be analyzed (per HRS 343?)." What is also strange, and appears somewhat deceiving to the reader and confusing to the public, is that this same newsletter notes, "The SCOPING ACTIVITIES RELATED TO Hawaii Revised Statutes CHAPTER 343 process WERE COMPLETED between December 2005 and January 2006." (EIS law HRS 343 specific to d) above, on which the public is invited to comment for the purposes of this scoping process?) When reading this, some members of the public are now made to believe that the invited scoping comments will be strictly limited to the apparently still-pending Salt Lake and/or Airport route segment question. (EIS definition: "Environmental impact statement" or "statement" means an informational document prepared in compliance with the rules adopted under section 343-6 and which discloses the environmental effects of a proposed action, effects of a proposed action on the economic welfare, social welfare, and cultural practices of the community and State, effects of the economic activities arising out of the proposed action, measures proposed to minimize adverse effects, and alternatives to the action and their environmental effects.) Please clarify exactly what it is for which you are inviting public comments.

Web Site Comment
www.honolulutransit.org

3/30/2007

FROM:
Dexter Okada
Kaka'ako Business and Landowners Association
P.O.Box 898
Honolulu, Hawai'i 96808
dexter.okada@uokada.com, 597-1102

COMMENT:
My name is Dexter Okada. My small family business has been in Kaka'ako for over fifty years. I also represent Kaka'ako Business and Landowners Association. Our basic mantra is community input. In other words, we want to have a voice in determining the future of our community not just commenting at scoping meetings.

In the central Kaka'ako area, there are many small properties. On these properties are small businesses. Many of these small business are light industrial or service businesses that serve communities from downtown out to East Oahu and to the windward side. The economic impacts of the route and the resulting transit oriented developments could have a tragic impact on these small businesses and small properties. Eminent domain is a frightening phrase for small property owners. Hawaii Community Development Authority is currently revising their Mauka Plan and Rules to help the small businesses and small property owners in Kaka'ako. Will the transit project undermine this effort? It is often said that small business is the backbone of Hawai'i's economy. Will the transit project be another burden placed on the backs of the small businesses in Kaka'ako?

TP-202504

hawai'i chapter
of the
american planning
association
p.o. box 557
honolulu
hawai'i
96809
www.hawaiiapa.org

April 2, 2007

Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813

Attn: Honolulu High-Capacity Transit Corridor Project

Re: **Hawaii Chapter Comments on Scoping for the Environmental Impact Statement (EIS) and Preliminary Engineering**

Gentlemen/Ladies:

The importance of this project cannot be overstated in terms of the way it will shape new urban spaces for fifty or more years, as well as re-shape the urban form of Honolulu that has evolved in the past hundred years. Given this historic importance:

- The project should structure a context sensitive design (CSD) process based on principles of community based planning. This is different from a community information process. The purpose of the CSD community process is to identify connectivity issues and to integrate transit with other community spaces. Every station area should have a community level plan developed by the affected community. This should be completed well before construction is started, especially if the project moves forward as design-build. The community process should be funded adequately to produce the plans in a timely manner.
- The framework and ground rules for the CSD community process should be crafted by an independent Task Force of experts from the fields of facilitation and community participation. This independence is critical so that a climate of mutual trust can predominate, clearing the path for wise decision-making and the resolution of differences. The ground rules developed by the Task Force should ensure that the community process is timely and is not used by opponents to obstruct or delay the implementation of transit.
- The station plans should address connectivity, including access for pedestrians, bicyclists, bus rider transfers, and park-and-ride facilities (as appropriate) within the community. The plans should also address other parking policies within the communities affected by transit.
- Transit-oriented development (TOD) must be about creating new urban places. Opportunities will vary by location. From the experiences in other transit cities, TOD does not occur by accident, but by well formulated articulation of community objectives, criteria for evaluation, policies and regulations. The specific processes for encouraging and then processing TOD should be described in the EIS.
- There needs to be input from the local design and physical planning community starting now in the EIS process and carrying through preliminary engineering, procurement and on to construction. Design cannot take a second seat to cost, expediency or be left to private consultation between the city and individual landowners. Further, design

issues should not be totally in the hands of architects based outside of Hawaii and who may be unfamiliar with elements that create a Hawaiian sense of place.

The next three scoping comments are specific to the beginning and end points of the MOS. This makes them doubly critical for their end of line issues as well as for future extensions. The alternative development process must allow for and produce alternate designs which enhance and draw out the urban form possibilities surrounding the MOS end points.

- The preliminary indications for the design of the Ala Moana station are that it would be at an eighty foot elevation. Such a height contradicts good urban space planning in that location and would create logistical problems for both modal transfer and future extensions. The scope of the EIS needs to be broad enough to test horizontal and vertical variations to find those that best reduce the height of this and any other stations to a more human scale. The City should not shy away from takings when necessary to achieve the right form and to enhance ridership.
- The preliminary indications for transit in Kapolei are that it may not be within the West Oahu Campus. Scoping should include review of an option integrated within the campus.
- All stations in the Ewa Plain must be integrated fully with the overall urban form following principles of connection, and not be relegated to the periphery of master planned sub-communities.

Thank you for the opportunity to comment on the scope of the EIS. APA Hawaii Chapter remains committed to working with the City towards the successful rebuilding of Honolulu through transit.

Sincerely,

Gene Yong, AICP
APA Hawaii Chapter President

John P. Whalen, FAICP
APA Transit Committee

TP 4/07-20326/

THE LEAGUE
OF WOMEN VOTERS OF HONOLULU

49 SOUTH HOTEL STREET, ROOM 314 HONOLULU, HAWAII 96813 PH. (808) 531-7448

APR 11 8 05 AM '07

TRANS PLANNING

April 9, 2007

Department of Transportation Services
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Re: Honolulu High-Capaciiy Transit Corridor Project Scoping

The League of Women Voters of Honolulu recommends that the following issues be addressed in the Draft EIS:

- **Potential riders**. We do not think there is a sufficient population base to support the shortened route. Eliminating Waikiki and the University of Hawaii from the eastern terminus and a large part of the Ewa plain at the western end of the project leaves a much smaller population to support the project (which was inadequate to begin with). It appears that the City is using transit as a planning tool to encourage high population densities around the transit stations. This is a laudable goal for smart growth. However, it is highly unlikely that it will be paid for by the main beneficiaries, the landowners near the stations. Instead it will be most likely be funded at the local level by the increase in GET, the most regressive possible tax that will fall heaviest on persons with the least ability to pay. And long-term future growth will not provide riders for the system when it is constructed.

- **Rail vs. bus**. The proposed amendment to the OMPO 2030 Plan makes it clear that the Honolulu City Council approved a fixed guideway system. It did not specify rail. The DEIS should also take note of this and not discuss the proposed system as though rail transit were the only option. Buses are a reasonable and much more flexible option than trains. Buses could enable some people to avoid transfers and thus increase ridership. Buses would stop in pull overs so that the buses would not block the guideway and would not hold up buses behind them. The DEIS should spell out the economics, social and environment aspects of the bus system and the rail system.

- **Costs**. Projected costs have to date been unrealistic. The degree of cost escalation that has occurred so far indicates that the methodology now being used is poor and more accurate and realistic methods are needed.

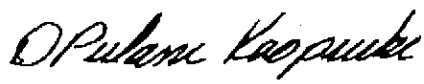
- **Revenues**. Projected revenues are also unrealistic. No system in the country has had a simultaneous increase in both bus and riders

- **Housing**. Impacts on existing housing along the selected route should be addressed. How many units of affordable housing will be removed to build the fixed guideway structure and the transit stations?

- **Traffic congestion**. The effects the proposed rail transit project will have on highway traffic should be displayed prominently. If letters to the editor of our local newspapers are any indication, many people believe that traffic congestion will be very much improved. In fact, the alternative analysis suggests that highway traffic won't get worse as fast as it would have without transit. This is a vast difference and should be clearly explained. Congestion pricing should also be included as an alternative. This has been effective in other cities and there is no reason to think it would be effective on Oahu.

In general, the DEIS should address those areas that the Alternatives Analysis overlooked or made short work of in order to justify rail.

Thank you for giving is this opportunity to comment.



D, Piilani Kaopuiki, President
League of Women Voters of Honolulu.

To: Kaku, Melvin N <mkaku@honolulu.gov>
CC: Donna.Turchie@fta.dot.gov <Donna.Turchie@fta.dot.gov>
Sent: Tue Apr 10 11:31:44 2007
Subject: ** SPAM ** Honolulu High-Capacity Transit Corridor Project

These comments are in response to the "scoping" request process for the above project.

First, there is no end result good for the customer (individual member of the public). The overwhelming want of every to and from work commuter is less traffic congestion. That public need is not addressed anywhere in the plan. It is as if Safeway planned to build a new store without a produce or meat department.

Second, there are only "do nothing" or government provided solutions. Private enterprise and accompanying attempts to address consumer needs are not on this agenda.

Third, a review of all laws and procedures as impediments to innovation is absent. That aspect should have been first.

Fourth, the average member of the public is intimidated by a "planning" process that asks for his input only as a matter of form. His substantive needs/wants are not addressed with any sincerity. "Scoping" is thus a process, not a search for genuine concern and/or solutions to his problems.

Fifth, this whole "project" is so very governmental. If a private company followed these procedures with hope of well serving the public profitably, it would have long since been dead broke.

Sincerely,

Richard O. Rowland, President
Grassroot Institute of Hawaii
1314 S. King Street Suite 1163
Honolulu, HI 96814
Tel: 808.591.9193 Fax: 808.356.1690
Cell: 808.864.1776

Note my e-mail address has changed to:
dick@grassrootinstitute.org
<http://www.grassrootinstitute.org/> http://www.grassrootinstitute.org/

From: Liu, Rouen [mailto:rouen.liu@heco.com]
Sent: Thursday, April 12, 2007 3:06 PM
To: Nalani E. Dahl
Subject: High Capacity Transit Corridor Project EIS process - comments from Hawaiian Electric Company

Thank you for allowing Hawaiian Electric Company (HECO) to be a part of the planning process.

In the EIS, please identify and address the following:
1) energy (electrical power) requirements for the various alternatives;
2) facilities necessary to meet energy requirements;
3) costs associated with meeting energy requirements;
4) existing utilities that will require relocation and the associated costs;
5) permits and approvals needed to meet energy requirements and necessary existing utility relocations; and
6) emergency generation to temporarily power the system as well as emergency fuel storage, emergency generator emissions, and noise.

Please note that HECO's work and associated costs related to the transit may be subject to approval by the State Public Utilities Commission. For this and other planning reasons, HECO would prefer to coordinate and plan for electrical needs or relocation as soon as practical.

Rouen Liu
Project Administrator
Hawaiian Electric Company

This message was also entered via the internet at www.honolulutransit.org as instructed in page 1-3 of the scoping information package. Due by April 13, 2007

April 12, 2007

Department of Transportation Services
City and County of Honolulu
650 S. King Street, 3rd Floor
Honolulu, Hawai'i 96813
Attention: Honolulu High-Capacity Transit Corridor Project

RE: PARKING CONCERNS REGARDING THE EAST KAPOLEI TERMINUS OF THE MINIMUM OPERABLE SEGMENT OF THE HONOLULU-HIGH CAPACITY TRANSIT PROJECT

Thank you for providing us with an opportunity to provide comments during the scoping phase of the Environmental Impact Statement (EIS) for the Minimum Operable Segment (MOS) of the Honolulu-High Capacity Transit Project. The lands near the transit stops in the vicinity of the East Kapolei terminus of the project's MOS are in various stages of planning, development and construction. As landowners, developers and a regulatory agency (HCDA) located near the East Kapolei terminus of the MOS, we have worked collaboratively to address infrastructure and development issues within this region and to accommodate the proposed transit corridor and stations.

However, because the East Kapolei transit stations will be the western terminus of the MOS, we are concerned that without dedicated accommodations for transit-related automobile parking in the vicinity of the planned East Kapolei transit stations, on-and off-street parking within the future developments may become "de facto" park-and-ride facilities.

A potential solution to this problem could include extending the transit corridor makai of its existing terminus near the KROC Center to properties where there is land available for a park-and-ride facility located in HCDA-regulated lands in Kalaeloa, about 6,500 feet to the south of the current terminus, where there is 200+ acres available to the City.

Thank you for the opportunity to provide comments during the EIS scoping period. We look forward to working with you on this exciting project.

Sincerely,

University of Hawai'i-West O'ahu

Department of Hawaiian Home Lands

Hawaii Community Development Authority

D.R. Horton-Schuler Homes, LLC

Salvation Army-Hawaiian and Pacific Islands Division

DEPARTMENT OF HAWAIIAN HOME LANDS

D·R·HORTON America's Builder SCHULER DIVISION

KAKAAKO KALAELOA

DOING THE MOST GOOD

TP - 204095

Comments for EIS Scoping
For the
Honolulu High-Capacity Transit Corridor Project
Submitted by The Outdoor Circle
April 13, 2007

Introductory Remarks

The Outdoor Circle (TOC) has been involved in the Honolulu High-Capacity Transit Corridor Project from the very beginning. In addition to attending the early meetings at the Blaisdell Exhibition Hall and at the City's auditorium, TOC belongs to the City's Transit Solutions Advisory Committee. We also have received two briefings from the City's consultant at our statewide office and have attended numerous City Council hearings as this project has evolved. Therefore, we have license to speak out about the process the City has undertaken to inform, involve and include the public in this project.

Representatives from The Outdoor Circle attended the public scoping meeting, March 29, at McKinley High School. We were appalled at the lack of effort by the City's Public Involvement Team to draw comments and concerns from the public. Having attended dozens of scoping sessions for projects undergoing both NEPA and state environmental review in the past, it is our opinion that the effort put forth at McKinley High was, without a doubt, one of the poorest attempts to engage the public and gather meaningful information that we have witnessed.

The information presented on the posters at the scoping meeting was strikingly similar to the posters presented at previous meetings. It appeared that no new information was provided. Those in attendance were expected to ask questions of the "experts" standing at each easel. However, those questions were not captured as scoping comments in any way. At the easel focusing on aesthetics we asked the person standing in front of it if he was the one to speak to about the project's impacts on the visual environment. His response was "No, but I know some of those people." Then he quickly turned his attention to an apparently less threatening member of the public.

While it might make easier the City's job of writing the Draft Environmental Impact Statement (DEIS), we believe that this scoping effort has failed in its effort to be a meaningful tool to identify and enable the City to properly address the many and very real concerns that exist in our community over the construction and operation of the proposed transit project.

The Outdoor Circle's comments on the Impacts of the Transit Plan Presented at Scoping

The Outdoor Circle has many concerns about the overall effectiveness and viability of the proposed project, the extreme cost and long-term burden to taxpayers and the impact the

diversion of City dollars will have on other City responsibilities such as maintenance in our parks and roadways. However, we will limit our initial comments to specific concerns about the project's impacts on the visual environment that we believe must be addressed and resolved in the DEIS.

View Planes

We have grave concerns about the interruption of Mauka to Makai view planes that will be created by the transit fixed guideway and the multitude of transit stations (and electrical substations) that are planned along the chosen route. The guideway itself will certainly dominate the nearby landscape throughout the route, and transit stations, some as high as 60 feet, will be ever-present obstructions to multitudes of residents who live uphill from the chosen route. These visual impediments will block the view planes from thousands of homes and businesses, thus reducing the quality of life for much of Oahu's population as well as the millions of visitors to this island. If the project moves forward, every possible effort must be made to reduce the negative visual impact of this infrastructure. The DEIS must include meaningful information on the view plane obstructions and how the intrusion on the visual environment will be mitigated. Visual representations, such as detailed landscaping plans and visual simulations must be provided, along with meaningful explanations of how the elements of the plans will mitigate the damage.

Trees

As proposed, construction of transit infrastructure will result in the removal, relocation and/or severe pruning of numerous significant trees that currently line the roadways and medians where transit will run. Among others, these include the heritage Kamani trees on Dillingham Boulevard. Removal of these trees is unacceptable to The Outdoor Circle as well as untold thousands of the general public. If the City persists in Dillingham becoming part of the transit route, it is absolutely essential that the project be engineered in a manner that does not result in damage to these revered trees, much less their removal. The authors of the DEIS should acknowledge that not all significant trees on O'ahu are included on the State's Exceptional tree list. There are hundreds of trees considered by our communities as important trees and every effort to keep them intact must be taken. Relocating trees may or may not be an effective treatment since not all trees can survive relocation. The DEIS must provide real information on the existing trees as well as trees to be planted in the future. Mitigation for the loss of any existing trees must be addressed now. It is not enough to say that the city is working with a consulting arborist and tree issues will be addressed on a case by case basis. In addition, the DEIS must provide tree protection plans that will mitigate the effects of construction on existing trees, their roots and their canopies. How these tree protection plans will be utilized also must be addressed in the DEIS.

Advertising

As currently planned, the City's budget will be heavily burdened by the construction and operation of transit. It stands to reason that as a consequence, the City will look for untapped

revenue streams to provide long-term financial support. Throughout the process City officials have stated that there will be no outdoor advertising on transit stations or the trains themselves. The Outdoor Circle believes it is absolutely essential that the City go beyond denying that advertising is a viable source of revenue. We insist that the City pledge and publicly state that it will not, under any circumstances, ever allow commercial advertising or inappropriate off-site signage of any type, to be placed on any trains or stations or any other aspect of the transit project. This must be acknowledged in the DEIS.

Summary

As the oldest environmental organization in the State of Hawai'i representing thousands of Hawai'i citizens, and as a result of its detailed involvement in virtually every step of the transit project to date, The Outdoor Circle strongly urges the City to take great care to properly address the concerns raised in these Scoping comments. We believe by doing that problems can and will be avoided in the future.

Please consider The Outdoor Circle as a consulted party to the action. Thank you for the opportunity to comment.

Sincerely,

Mary Steiner
CEO
The Outdoor Circle
1314 South King Street Ste 306
Honolulu, HI 96813
(808) 593-0300

cc: Office of Environmental Quality Control

HAWAI'I HOTEL & LODGING
ASSOCIATION
2270 Kalakaua Ave., Suite 1506
Honolulu, HI 96815
Phone: (808) 923-0407
Fax: (808) 924-3843
E-Mail: hhla@hawaiihotels.org
Website: www.hawaiihotels.org

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Department of Transportation Services
City & County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813
Email: www.honolulutransit.org

Attention: Honolulu High-Capacity Transit Corridor Project

Aloha!

The Hawai'i Hotel & Lodging Association is a statewide association of hotels, condominiums, timeshare companies, management firms, suppliers, and other related firms and individuals. Our membership includes over 170 hotels representing over 47,300 rooms. Our hotel members range from the 2,523 rooms of the Hilton Hawaiian Village to the 4 rooms of the Bougainvillea Bed & Breakfast on the Big Island.

Thank you for this opportunity to provide comments on the proposed Environmental Impact Statement for Honolulu's High-Capacity Transit Corridor Project. The Hawai'i Hotel & Lodging Association ("HHLA") continues to support the fixed guide-way alternative from Kapolei to the University of Hawaii serving the airport.

We are, however, very concerned about the Waikiki spur utilizing an elevated guide-way along Kuhio Ave. HHLA believes alternative solutions to servicing Waikiki need to be considered in the EIS process. The impacts of any elevated lines along Kuhio Avenue will outweigh the benefits of this service. It is essential that alternative solutions for providing access to Waikiki be considered. We believe one alternative to be studied for the Waikiki spur should include a Waikiki people mover that connects to the main fixed guide-way in the vicinity of Ala Moana Center or the Hawaii Convention Center.

Again, mahalo for the opportunity to provide comments. If you have any questions or concerns on this matter, please feel free to contact me at (808) 923-0407 or via email at mtowill@hawaiihotels.org

Mahalo Nui Loa

MURRAY TOWILL
President
Hawai'i Hotel & Lodging Association

March 18, 2007

Ms. Donna Turchie
Federal Transit Administration, Region IX
201 Mission Street, Room 1650
San Francisco, CA 94105

Dear Ms. Turchie:

Elimination of Managed Lanes from Honolulu High-Capacity Transit Corridor Project

We object to your failure to include a Managed Lane Alternative (MLA) in your Notice of Intent (NOI) of March 15, 2007, and ask that the notice be amended to include an MLA, and then be republished. We would also like you to clarify the reasons for having two NOIs in effect concurrently.

The double NOI issue.

Neither the Federal Transit Administration (FTA) nor the City and County of Honolulu (City) has made any attempt to clarify why FTA issued a second NOI. While the NOI of December 7, 2005, initiated the NEPA process, the NOI of March 15, 2007, informs us that the NEPA review is "initiated through this scoping notice." Does this mean the old NOI is cancelled? Have we not been in the NEPA process since December 2005?

We also see from the new Scoping Information Package that scoping under HRS 343 was completed in 2005 and that this new scoping is only to satisfy NEPA. However, the NOI of December 5, 2005 and the Scoping Report of April 6, 2006, both discussed the scoping at that time being done under NEPA. We realize that you may not be deliberately confusing the issue, but the result is the same.

Further, we did not receive any response to Honolulutraffic.com's 13 pages of specific comments[1] dated January 9, 2006, until February 22, 2007, and even then it was, for the most part, the usual Parsons Brinckerhoff (PB) boiler plate with few of the specifics addressed. Assumedly, this aspect of the NEPA process does not require "public involvement."

MLA denied fair and equitable treatment

The MLA was denied fair and equitable treatment in the Alternatives Analysis (AA) by the City and County of Honolulu (City) and Parsons Brinckerhoff (PB). As a direct and intended result, the MLA was unjustly eliminated — not for "good cause" but rather for political cause. We submit that this was a blatant violation of the spirit and intent of the regulations that govern the environmental process; we further submit that only by reinstating MLA into your Notice of Intent and the Scoping process, can Honolulu aspire to reducing its traffic congestion. The following supports these claims.

Excessive MLA capital cost projection

PB projects initial costs of $2.6 billion for the *two-lane* reversible elevated Managed Lanes Alternative (MLA) in addition to bus costs (AA, p. 5-2).

[1] Attached to covering email as Scoping_comments_3.pdf

To put that projected cost in perspective, it is seven times the cost of Tampa's comparable new ten-mile *three-lane* elevated reversible expressway and 50 percent greater than the cost of the H-3 highway – even allowing for inflation. At such a cost the MLA would replace H-3 as America's costliest highway, despite H-3 being twice the size, built over difficult terrain, and with extensive tunneling.

The soft costs alone for the MLA are projected at $549 million,[2] which is 30 percent more than the cost of the entire Tampa Expressway, including the $120 million overrun error by URS Corp.

Since we lack sufficient details about the MLA, what may well be driving up the cost are the 5,200 parking stalls (AA, p. 3-8) built into the project, which are almost entirely unnecessary. We have failed to find any significant parking associated with an MLA elsewhere in the country.

To bolster our stand on PB's exaggerating capital costs for the MLA, we have attached comments by Dr. Martin Stone, AICP, Planning Director of the Tampa Expressway Authority, who says, in this detailed four page letter that,

> "It is completely dishonest to say the elevated HOT lane in your transit alternatives analysis is similar to our elevated reversible lanes. And, it is this dishonesty that results in your HOT lanes costing $2.6 billion instead of the less than $1 billion that a true copy of our project would cost."[3]

During the AA process, the City Council appointed a Transit Advisory Task Force to assist them in evaluating the AA. It consisted of six politically-connected people whose views could be relied upon to support the City's agenda, and Dr. Panos Prevedouros, Professor of Traffic Engineering at the University of Hawaii, whose views are based on engineering and science, and not politics.

The Chairman appointed two members to a Technical Review Subcommittee to review construction costs. One had been a long time employee of the state DOT and the other was the recently retired Director of Honolulu's City Department of Transportation Services (DTS).

After their first report to the Task Force, we asked them who they had contacted since there needed to be a reconciliation of the Tampa Expressway cost (less the design error) of $320 million and the PB estimate of $2.6 billion for the MLA. They told us they had only talked to PB, but had been assured that the costs were accurate.

We pushed for a consultation with the Tampa Expressway Authority and especially with PCL Construction, Inc., since they had built the Tampa Expressway, the Hawaii Convention Center, and maintained offices in both Tampa and Honolulu and would be familiar with the costs and construction difficulties in both cities. One of the subcommittee members made a phone call to Tampa; no one contacted PCL. The subcommittee report is attached to the covering email; the lack of due diligence warranted by a multi-billion dollar project is quite evident, and may reflect a breach of the fiduciary duty to investigate and verify the facts and take the necessary steps commensurate with the amounts involved.

After consulting with many industry professionals, we have projected a cost of $900 million for the MLA, including a 25 percent allowance for cost overruns. This is still more than twice the cost of the Tampa Expressway. At $900 million, the MLA would surely have been the LPA, and that is the reason, we submit, for the exaggerated capital cost estimates by PB.

Excessive operating cost

The high operating cost for the MLA is mainly caused by the large number of buses projected for it. The following bus fleet data is taken from the AA, table 2-1, and the daily trips data from the AA, table 3-7. The percentages shown are calculated from these data.

---

[2] Capital Costing Memorandum, App. A, Alternative 3.
[3] Attached to covering email as stoneTampa.doc.

Alternative	Bus Fleet	% change in buses			thous trips daily	% change in trips		
		from exist	from NB	from TSM		from exist	from NB	from TSM
Existing	525	0.0%	N/A	N/A	178.4	0.0%	N/A	N/A
NB	614	17.0%	0.0%	N/A	232.1	30.1%	0.0%	N/A
TSM	765	45.7%	24.6%	0.0%	243.1	36.3%	4.7%	0.0%
MLA	906	72.6%	47.6%	18.4%	244.4	37.0%	5.3%	0.5%
Rail-Halek	540	2.9%	-12.1%	-29.4%	294.1	64.9%	26.7%	21.0%

Note that the MLA is projected to have a bus fleet nearly 50 percent greater than the No-build alternative, yet gain only five percent more trips. This small increase is projected despite the MLA offering bus users the advantage of a congestion free ride from the Leeward end of the corridor to downtown.

The 906 buses projected are far too many buses for the projected MLA ridership. It should be anticipated that more riders per bus would be achieved by the MLA option in the Corridor since buses using the MLA would be operating at far higher speeds than either the No-Build or the TSM and thus able to make more trips per bus; the round trip can be made by returning on the relatively uncongested freeway.

Insufficient ridership projected for the MLA

The MLA should project significantly more riders than the No-Build or TSM Alternatives since it will offer potential bus riders a significant time savings of 16 minutes versus automobile travel on the regular freeway. Currently, buses take 39 minutes to travel 13 miles at 20mph on the regular freeway.

If we assume that the number of cars removed from the freeway by the MLA will decrease travel times by 25 percent then buses (and cars) on the regular freeway will take 29 minutes to traverse the 13 miles. Buses on the MLA will take 13 minutes and will offer a significant and enticing 16 minute time savings to some motorists to switch to buses.

Killing the MLA advantage

The AA version of the MLA allowing free passage to HOV-2s significantly reduces the advantages of the MLA over rail transit.

To add insult, PB said in a letter to us that "A two-lane reversible option for the Managed Lanes Alternative, matching what you have proposed, has been added to the range of alternatives being evaluated in the Alternatives Analysis."[4]

What we actually proposed was a 10-13 mile facility and in our comments on the original Scoping wrote, "On the HOT lanes, buses and vanpools would have priority and travel free, other vehicles would pay a toll ..."[5] What resulted was a 16-mile facility, unnecessarily lengthened to presumably drive up costs, with HOVs allowed free.

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[4] Letter signed by Mr. Melvin Kaku, DTS Director to me on 2/26/2007 by Mr. Lawrence Spurgeon of PB and dated 6/20/2006. It refers to "AA and Chapter 343 Scoping of the Honolulu High-Capacity Transit Corridor Project."

[5] Scoping Report, Appendix B. page 46 of 100.

First, allowing HOV-2s at no charge on the MLA means that the zipper lane will no longer be needed. Thus, PB added the 2-lane MLA and deleted the HOV zipper lane, thereby reducing the two-lane gain to a single lane gain.

Second, this policy greatly increases the costs of policing the MLA as staff attempt to determine whether or not autos have the requisite number of automobile occupants. On the other hand, pre-registered buses and vanpools would be outfitted with transponders signifying their legitimacy and will take little policing.

Third, this policy reduces the revenues available to fund the project, thus necessitating a tax increase.

Insufficient ingress/egress options provided for MLA

The rail transit alternative in the AA presently has five different alignment options that have survived the process to date. The reversible MLA, on the other hand, has only one.

PB should have also examined five options for the MLA alternative. They should have considered the three-lane option as built by the Tampa Expressway since it offers a 50 percent greater lane capacity at only a 20 percent increase in cost. They should also have considered both two and three lane options in combination with more options for ingress/egress along the lines suggested by Dr. Prevedouros.[6]

MLA should never be at Level of Service (LOS) D

For some reason PB is showing the MLA option operating at LOS B to D in the morning peak hour. Since dynamically priced MLAs are operated to keep them congestion free, we do not understand why they should not be LOS B, or better, at all times.

FTA funding will likely be allowed

PB says that the Federal Transit Administration (FTA) New Starts funds cannot be used for the MLA Alternative (AA, p. 6-10). However, the FTA has been revising its policies on MLAs such as the recent one allowing funding for HOT lane conversions from existing HOV lanes. While FTA's policy still holds that HOT lanes built *de novo* cannot be funded with New Starts funds, it places the policy in conflict with recent changes in FTA policy favoring variably-priced lanes.

One might reasonably expect that an MLA that met certain conditions, such as giving buses and other high occupancy vehicles priority over automobiles, would, in time, be eligible for New Starts Funds and therefore should be studied further in the Environmental Impact Statement process.

PB has under-engineered the MLA

Professor Prevdouros examined the MLA from an engineering perspective and submitted his report to the Transit Advisory Task Force. He finds PB's treatment of the MLA significantly lacking and concludes,

> "Based on substantial evidence of ML being under-engineered, its performance statistics of are not representative of what a new 2-lane reversible expressway can do for this corridor … In short, the ML provides extensive regional traffic management possibilities, none of which were explored."[7]

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[6] A Design for a HOT Expressway and Other Traffic Relief Projects for Oahu,

[7] Attached to covering email as Panos_TATF_final_report.doc

FTA gives no weight to traffic congestion reduction

> "… in current evaluations of proposed New Starts projects, FTA considers directly only those user benefits derived directly from changes in transit service characteristics."[8]

At the Pearl Ridge screenline, the only freeway is H-1 and for the peak period inbound provides five regular lanes, a zipper lane and an HOV lane.

A properly defined MLA would provide an additional two lanes to the above. More importantly, it would be the equivalent of four new lanes since the MLA is a more efficient conveyer of vehicles. As shown in the U.S. Department of Transportation (USDOT) *Congestion Primer*,[9]

> Vehicle "throughput" on a freeway is the number of vehicles that get through over a short period such as an hour ... The number of vehicles that get through per hour can drop by as much as 50 percent when severe congestion sets in … each variably priced lane in the median of State Route 91 in Orange County, California, carries twice as many vehicles per lane as the free lanes during the hour with heaviest traffic. Pricing has allowed twice as many vehicles to be served per lane at three to four times the speed on the free lanes.

Therefore the two lanes of the MLA would take the equivalent of four lanes of traffic off of the H-1 freeway, providing significant traffic relief in the Corridor.

We do not understand why this is not being taken into account by FTA. In announcing a war on traffic congestion as the new policy, Secretary Mineta announced that,

> Transportation congestion is not a fact of life. It is not a scientific mystery, an uncontrollable force, or the insurmountable fate of the American people. Rather, congestion results from poor policy choices and a failure to separate and embrace solutions that are effective from those that are not.

He concluded the policy announcement by declaring that,

> The Administration's objective must be to reduce congestion, not simply to slow its increase. Congestion is not an insurmountable problem … The Federal Government's most important role is to establish mechanisms to ensure that the right investments get made … We must end the era of complacency about congestion. The **National Strategy to Reduce Congestion on America's Transportation Network** provides the framework for government officials, the private sector, and most importantly, the citizen-user, to take the necessary steps to make today's congestion a thing of the past. (original emphasis)

Furthermore, SAFETEA-LU states that, "… the Secretary shall analyze, evaluate, and consider … factors such as … congestion relief."

Is this policy meaningless? Does it only impact the Secretary's office and have no meaning to FTA?

Traffic congestion reduction is critically important to Oahu citizens and the bias shown by the AA against the MLA needs to be addressed.

For example, Professor Prevedouros states that simply using the AA, table 3-5, AM inbound, as the basis for calculations, and a) allowing for a three-lane variant of the MLA, and b) reinstating the zipper lane, that far lower congestion would exist on the H-1 regular lanes in 2030 than existed for actual conditions in 2003 even given the AA's highly questionable population forecasts.

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8 http://www.fta.dot.gov/documents/Discussion_1_CE_Allowances.doc

9 US DOT Congestion Primer

Summary:

The foregoing are the most important points about the bias exhibited towards the MLA by the City and PB, its "client-focused" consultant.

A disinterested reviewer could only conclude that, at the hands of the City and PB, the MLA has not been accorded fair treatment and that the MLA should be reinstated into the Scoping process — preferably with the MLA study being performed by another, more taxpayer-focused consultant.

Sincerely,
HONOLULUTRAFFIC.COM

Cliff Slater, Chair

Atts:
cc: Mr. Tyler Duvall
Mr. David Horner
Mr. Ron Fisher
Mr. James Ryan
Mr. Ray Sukys
Mr. Melvin Kaku

January 9, 2006

Acting Director Alfred Tanaka
Department of Transportation Services
City and County of Honolulu
650 S. King Street, 3rd Floor
Honolulu, Hawaii 96813

Dear Mr. Tanaka:

Comments on the December 2005 Scoping Meetings

The Scoping Meeting conducted by Parsons Brinckerhoff and the City and County of Honolulu Department of Transportation Services (DTS) on December 13, 2005, provided insufficient information, both at the meeting and at the www.honolulutransit.com website, for the public to understand the cost-effectiveness of the alternatives.

While Parsons Brinckerhoff and DTS showed that the "Development of Initial Set of Alternatives" emerged from "Technical Methods" and "Evaluation Measures,"[i] they refused to disclose the quantitative data that they developed during this process thus denying full public access to key decisions.

For significant public involvement as specified by the Federal Transit Administration (FTA), the public must have some rudimentary understanding of the costs and benefits of each of the alternatives considered — both those accepted and those rejected.

The costs must include capital and operating costs. The benefits and disbenefits must include forecast travel time changes, patronage and traffic congestion impacts. Only with this information can the public be truly involved in the process.

In short, the 'system planning' process has failed to follow the FTA process, as follows:

A. The projected capital costs, operating costs, financing, travel times, patronage and traffic congestion for the alternatives have not been available.

B. The process has failed to define adequately the specific transportation problems let alone evaluate how each alternative addresses them.

C. The level of effort exerted in developing the alternatives has been insufficient.

D. The public has not been involved to the extent required by the FTA.

A. The projected cost effectiveness data have not been available to the public.

> "During systems planning, the analysis of alternatives focuses on identifying fatal flaws and a preliminary analysis of cost-effectiveness … Three types of information are particularly important for evaluating cost-effectiveness: transit patronage, capital cost, and operating and maintenance cost." Procedures and Technical Methods for Transit Project Planning (PTMTPP). Part I. p. 2-9. (emphasis added)
>
> "When local officials seek [FTA] approval to initiate alternatives analysis, the results of system planning studies are used by [FTA] to decide whether to participate in further detailed study of guideway alternatives in the corridor. Much of the information needed to make these decisions should be available in reports produced during the system planning phase." PTMTPP, Part I, p. 2-12. (emphasis added)
>
> "These definitions [of alternatives] are sufficient to address such general concerns as ranges of costs, ridership potential and financial feasibility. More basically, they provide the information necessary for decisionmakers and other stakeholders to confirm that no reasonable alternative (in terms of meeting corridor needs) is being excluded from the analysis, as well as understand the magnitude of the costs and benefits associated with the various options for improving conditions in the corridor." Additional Guidance on Local Initiation of Alternatives Analysis Planning Studies (emphasis added)

The documentation required in the 'systems planning'[ii] process concerning public transit patronage data, capital cost and operating and maintenance costs, as required by the FTA has been either withheld from the public or not developed at all.

During the Scoping Meeting, we asked Mr. Hamayasu for cost data for the alternatives and he told us that the City did not have any. Since cost estimates are at the bedrock of scoping decisions it seemed strange that they were not available. This was especially true since Parsons Brinckerhoff had eliminated the reversible High-Occupancy\Toll (HOT) lanes proposal on the grounds of "cost and funding concerns."[iii]

Subsequent to the Scoping Meeting, Mr. Gordon Lum, Executive Director of the Oahu Metropolitan Planning Organization (OMPO) told us that the capital costs developed by their consultant were $2.5 billion each for both the reversible HOT lanes proposal, from Waipahu to the Keehi Interchange (±12 miles), and also the elevated heavy rail line from Kapolei to the University of Hawaii (UH) (±25 miles).

We asked to see the working for those calculations but Mr. Lum told us that their consultants, Kaku Associates, had only given them the number; there was no backup for it. He also said OMPO subsequently conveyed these projected costs to both DTS and the Hawaii State Department of Transportation (HDOT) and both had found them reasonable.

Failing any other explanation, we have to assume that Parsons Brinckerhoff and DTS used the OMPO costs in eliminating the reversible HOT lanes from the Alternatives Analysis.

The capital costs cited by OMPO are unreasonable. These costs, on a per mile basis, amount to $100 million per mile for the heavy rail line and $200 million per mile for the HOT lanes.

OMPO, HDOT, DTS and Parsons Brinckerhoff, would have us believe that a simple elevated *two*-lane highway (HOT lanes is merely the operating method) put out to bid would cost twice as much as a non-bid heavy rail line with all its attendant equipment, rolling stock, trains, and massive stations each with escalators, elevators, and stairs.

The Tampa, Florida, *three*-lane elevated highway due to open shortly costs $46 million per mile and that includes an expensive error by a contractor. The public authority responsible for it estimates they could duplicate it for $28 million per mile.[iv] Even allowing for Hawaii's politically induced high costs that tend to double Mainland prices, it still does not come close to the OMPO estimate of $200 million per mile.

No travel time comparisons are available. Since travel time is a major determinant of patronage forecasts and since HOT lanes may well offer a much faster journey for both autos and buses this information should have been available.

Patronage forecasts for the various alternatives are not available. Mr. Hamayasu told us during the meeting that while OMPO had developed ridership data for the rail, they had not shared it with DTS. We find this troubling since Mr. Hamayasu is Vice-Chair of OMPO's Technical Advisory Committee (TAC).

OMPO told us that while they had developed ridership forecasts for the various alternatives they would not show us the working of the calculations. We appealed this refusal to the Hawaii Office of Information Practices and OMPO now admits that their consultant's forecasts were "intuitive" and therefore there was no working paper to show us.[v]

We had asked for the working paper since the 360,000± daily rail ridership shown on their Strategic Planning Concepts chart (p. 6) for the Kapolei to University of Hawaii (UH) rail alternative would be an 80 percent increase over current ridership and a 50 percent increase in per capita ridership by 2030.

No Metropolitan Statistical Area (MSA) that has built a rail line in modern times has experienced an increase in the percentage of commuters using public transportation in a similar 20-year period, 1980-2000.[vi] We, therefore, find the ridership forecast preposterous failing a detailed, and credible, explanation.

The financing plan is not available.

> "The system planning phase produces a considerable amount of information that will later be used in alternatives analysis. This includes … An analysis of the region's financial capacity to provide planned improvements … and the capacity of the existing revenue base to meet future transit financial requirements." PTMTTP, Part I, page 2-2.
>
> "It is important that system planning consider such questions … 'When compared with lower cost alternatives, are the added benefits of the project greater than the added costs?'" PTMTTP, Part I, page 2-5.

How can this question possibly be answered without quantifying the costs and benefits?

The financing plan needs to show the impacts of the one-half percent General Excise tax increase. Mayor Hanneman had originally asked for a full one percent when he was advocating the $2.7 billion Kapolei to Iwilei line.[vii] Since then his plan has extended to UH and Waikiki but the state legislature cut the tax increase in half. This would only fund a third of the heavy rail alternative; the public needs to know the correct amount of the future taxes they will face.

Traffic congestion estimates are not available. Since HOT lanes promise to move far more cars off the Oahu's highways than would a rail line, it is imperative that the city make the preliminary estimates available to the public.

Funding problems insufficiently explained. Mr. Hamayasu told us that one of the reasons the reversible HOT lanes was eliminated was because of "funding concerns" and that was because FTA had told him that they would not fund HOT lanes. We asked him if he had such an opinion in writing and he said he had not. Since FTA officials have told us that, while they would have to see the precise plans for such a HOT lanes project, if it provided priority and uncongested travel for buses, they believed they would.

In any case, the FTA does not require that funding be in place in order to analyze the alternatives. If it did, it would have to reject the rail alternatives since the half-percent increase in the State General Excise Tax does not begin to cover the capital and operating costs. In addition, the 1992 Rail Plan had no funding in place at any time during the whole process.

B. The process has failed to define adequately the specific transportation problems let alone evaluate how each alternative addresses them.

> "I. 2. Systems Planning. … sets a proper foundation for moving forward into alternatives analysis … system planning serves as the first phase of the five-phased process for developing fixed guideway mass transit projects." PTMTTP, Part I, page 2-1.
>
> "This analysis includes the identification of specific transportation problems in the corridor; the definition of reasonable alternative strategies to address these problems; the development of forecasts for these alternatives in terms of environmental, transportation, and financial impacts; and an evaluation of how each alternative addresses transportation problems, goals, and objectives in the corridor." PTMTTP, Part I, 1.2.
>
> "The key principal in the identification of alternatives is that they directly address the stated transportation problem in the corridor ..." PTMTPP, Part II. 2. p. 3.

The scoping information package merely discusses "improved person-mobility" and "improved mobility for travelers facing increasingly severe traffic congestion."[viii] This is misleading information to give to the public. It implies that the process is about reducing traffic congestion when it is clear — with some careful reading — that it is about getting people out of cars and into public transportation. However, Parsons Brinckerhoff does not tell the public that that is their explicit purpose. Neither do they tell the public that no other MSA has managed to reduce the market share of commuters using automobiles.[ix]

If the transportation problem is defined as one of insufficient "person mobility" then one set of alternatives may be preferable, usually centered on public transportation. If on the other hand, Parsons Brinckerhoff were to define the problem as the public

understands it, “excessive traffic congestion hampering the movement of autos and goods vehicles,” then another set of alternatives will be preferred, centering around highways.

If we had a public transportation problem, we would not have had a significant decline in the per capita use of it during the past 20 years — from 96 rides per capita of population to 77 just before the strike. To make it worse this 20 percent decline occurred during a period when we increased the bus fleet by 20 percent. (State Data Books 1991 & 2004)

Conversely, during this same period, Oahu has had a 27 percent increase in registered vehicles with an increase of only a minuscule 2.2 miles of new freeways, from 86.3 to 88.5 miles — a 2.7 percent increase. (State Data Books 1991 & 2004.)

Hawaii has the fewest urban miles of highway of any state in the U.S. because highway construction has not kept pace with residential growth. No Metropolitan Statistical Area (metro area) in the U.S. has reduced traffic congestion by improving public transportation. We can only reduce it by increasing highway facilities and improving highway management and the Texas Transportation Institute concurs in that as follows:

> “The difference between lane-mile increases and traffic growth compares the change in supply and demand. If roadway capacity has been added at the same rate as travel, the deficit will be zero.” 2005 Urban Mobility Report. Texas Transportation Institute.

In addition, Parsons Brinckerhoff has not addressed the negative effects on our economy of the high cost of delivering goods on congested highways. They have ignored national, state and city formal transportation goals as follows:

> “Advance accessible, efficient, intermodal transportation for the movement of people and goods.” Federal Transportation Policy.
>
> “To create a transportation system which will enable people and goods to move safely, efficiently, and at reasonable cost.” City and County of Honolulu, General Plan for the City and County of Honolulu
>
> “To provide for the safe, economic, efficient, and convenient movement of people and goods.” State of Hawaii, Hawaii State Plan

Rail transit does absolutely nothing for the movement of goods “safely, efficiently, and at reasonable cost.” Parsons Brinckerhoff has entirely overlooked that goods move by roads on Oahu, while admitting — only when asked — that building a rail line will not reduce traffic congestion.[x]

This community needs a definition of the transportation problem with which everyone can agree and that is without doubt going to be ‘traffic congestion.’ Honolulu does not have a public transportation problem; it has a traffic congestion problem. This is the problem that Parsons Brinckerhoff and DTS need to address.

C. The alternatives are inadequate and the "level of effort" exerted in developing them insufficient.

"There's small choice in rotten apples."

This line from Shakespeare's *The Taming of the Shrew* is, appropriately, the opening line in the FTA's introduction to *Evaluation of the Alternatives*.[xi]

Each prior rail transit effort in Honolulu from the 1970s on has suffered from the same problem; the range of alternatives studied was inadequate and deliberately so. Disinterested experts have all commented on it.

> "Finally, the most serious deficiency of analyses done to date is the failure to devise and evaluate meaningful alternatives to HART. The so-called "alternatives analysis" is seriously deficient and the bus alternative considered in them can only be considered as "straw men." Dr. John Kain, Chair of Harvard's Economics Department. 1978.[xii]

> "In particular, what is lacking is a serious investigation of several viable dedicated busway options." Dr. Robert Cervero, Professor of Urban and Regional Planning, UC-Berkeley. 1991.[xiii]

Many more examples are available from experts' critiques of the 1990 Alternatives Analysis both on line and at the Honolulu Municipal Library.[xiv]

The reversible two-lane HOT lanes should be reinstated as an alternative.

Our proposal is for a two-lane reversible, elevated HOT lane highway between the H1/H2 merge near Waikele and Pier 16 near Hilo Hatties. This kind of HOT lanes approach has also been termed Virtual Exclusive Busway (VEB) and Bus/Rapid Transit. HOT lanes projects already in place elsewhere have demonstrated the viability of such an alternative.[xv]

During the 2002 Governor's Conference on Transitways, Mr. Mike Schneider, executive vice-president of Parsons Brinckerhoff, told the conference that the reversible tollway proposal giving buses and vanpools priority at no charge was the way the city should have planned its now defunct bus/rapid transit (BRT) program.

Interestingly, a month prior to the conference, Parsons Brinckerhoff prepared and released the state final environmental impact statement for the BRT declaring that:

> "The light rail transit alternative was dropped because subsequent analyses revealed that Bus/Rapid Transit using electric-powered vehicles could accomplish virtually all of the objectives of light rail transit at substantially less cost."[xvi]

On the HOT lanes, buses and vanpools would have priority and travel free, other vehicles would pay a toll that would be collected electronically by way of a pre-paid smart card, as is quite commonplace on the mainland today.

As on the San Diego I-15 HOT lanes, computers would dynamically calculate the toll price every few minutes to keep the lanes full, but free flowing.

One of the more surprising outcomes of implementing HOT lanes has been that they are popular with motorists across all income groups. Even those who use them rarely, still favor them because it is an option they can use when the need warrants it.[xvii]

A single highway lane with free-flowing non-stop traffic carries up to 2,000 vehicles per hour and with two lanes that means removing 4,000 vehicles from the existing freeway, or 25 percent of the current rush hour traffic using that corridor.

Our projection of the HOT lanes traffic of around 4,000 vehicles does not have to be calculated since we know that rush-hour highways are always fully used; it is only the toll price that that needs to be forecast.

Judging from San Diego's I-15 and Orange County's SR-91, the average cost will be about $4.50 under normal circumstances and up to $7.75 for special periods such as Friday evenings.[xviii]

HOT lanes may well offer a much faster journey for buses in comparison to trains. The total trip from Mililani to UH is an example:

- Neither the rail line nor the HOT lanes will be going to Mililani, and so from Mililani to the H1/H2 merge, both rail and HOT lanes alternatives will take the same time by bus. At the H1/H2 merge, the train option would always require a transfer whereas the buses on HOT lanes may not.
- Buses on the 10-12 miles of HOT lanes traveling at 55-60 mph (SkyBuses?) to Pier 16 will take half as much time as trains on the heavy rail line.
- Pier 16 to UH is 4.2 miles and we anticipate that trains would take half as much time as buses for this much shorter distance.

However, the time savings for the buses on HOT lanes will not be offset by the time lost by the bus alternative on the shorter in-town leg. The net result of the time taken for these two journeys would be that HOT lanes would still offer a faster journey than trains and, in addition, not mar the city's residential areas with an overhead rail line.

The major advantages of HOT lanes are:

- Traffic can travel at uncongested freeway speeds of 60mph whereas rail transit can only average 22.5 mph because of stops averaging every half mile.[xix]
- Buses on HOT lanes may travel door-to-door whereas rail nearly always requires transfers.
- HOT lanes offer both motorists and bus riders a choice of avoiding traffic congestion.
- The regular freeways will still be available and with less congestion than before since some 4,000 cars per hour will have been removed from them.
- Express buses using the HOT lanes can return on the far less congested regular freeway in the opposite direction and the HOT lane speed will enable buses to make two trips in the time it now takes to make one.

Options for the HOT lanes proposal that need further study are:

- The feasibility of a three-lane section from the H1/H2 merge to the Pearl Harbor area and then continuing on to Pier 16 as two lanes. This could service the considerable traffic that terminates at Pearl Harbor, Honolulu Airport, the Airport Industrial area, and the Mapunapuna industrial area. The three-lane version could still be of pedestal construction similar to the new Tampa, Florida, Expressway.
- The utility of extending the Ewa end of the HOT lanes further beyond the H1/H2 merge.

Most importantly, HOT lanes meet the requirements needed to maximize public transportation use explained by Dr. Melvin Webber, now Emeritus Professor of Urban Planning, UC-Berkeley in Honolulu 20 years ago,

> "Commuters choose among available transport modes mostly on the basis of comparative money costs and time costs of the total commute trip, door-to-door. Other attributes, such as comfort and privacy, are trivial as compared with expenditures of dollars and minutes. Commuters charge up the time spent in waiting for and getting into a vehicle at several times the rate they apply to travel inside a moving vehicle. This means that the closer a vehicle comes to both a commuter's house and workplace, the more likely he is to use that vehicle rather than some other. It also means that the fewer the number of transfers between vehicles, the better"[xx]

As we have detailed in this letter, the level of effort in data development so far has been insufficient to justify the elimination of the HOT lanes alternative.

> "The system planning effort should recognize the difference between the foregoing of precision and the sacrifice of accuracy in the technical work, so that estimates of costs and impacts, while coarse, are at least approximate indicators of the potential merits of the alternatives. The level of effort must be designed so that additional effort would not result in the choice of a different preferred alternative." PTMTPP, Part II, 2.2, p. 2. [emphasis added]

Parsons Brinckerhoff has substituted, in place of the reversible HOT lanes, a Managed Lanes Alternative, a two-lane elevated highway with one lane in each direction. This has been designed to fail the alternatives analysis process. As U-C Berkeley's Professor Robert Cervero said of the 1992 choice of rail, "it is less a reflection on the work of [Parsons Brinckerhoff] and more an outcome of pressures exerted by various political and special interest groups."[xxi]

This Managed Lane Alternative, for which there appears to be no precedent, is a "straw man" designed to make the rail transit line look good in comparison. Professor Kain has written extensively about such tactics, "Nearly all, if not all, assessments of rail transit systems have used costly and poorly designed all-bus alternatives to make the proposed rail systems appear better than they are."[xxii]

Instead, we believe that the new high-tech HOT lanes have shown such promise and such public — though not political — acceptance that they may be a far preferable alternative.

D. The public has not been involved to the extent required by FTA.

> "The goal of this [joint FTA/FHWA] policy statement is to aggressively support proactive public involvement at all stages of planning and project development. State departments of transportation, metropolitan planning organizations, and transportation providers are required to develop, with the public, effective involvement processes which are tailored to local conditions. The performance standards for these proactive public involvement processes include early and continuous involvement; reasonable public availability of technical and other information; collaborative input on alternatives, evaluation criteria and mitigation needs; open public meetings where matters related to Federal-aid highway and transit programs are being considered; and open access to the decision-making process prior to closure." (emphasis added)
> http://www.fta.dot.gov/grant_programs/transportation_planning/planning_environment/3854_8227_ENG_HTML.htm

> "The overall objective of an area's public involvement process is that it be proactive, provide complete information, timely public notice, full public access to key decisions, and opportunities for early and continuing involvement (23CFR450.212(a) and 450.316(b)(1))." (emphasis added) http://www.fhwa.dot.gov/environment/pub_inv/q2.htm

Clearly, as can be seen from the foregoing, our state and local agencies have hindered the public from getting access to information let alone granting "full public access to key decisions."

Further, the agencies are abetted in their endeavors by the 'strategic misrepresentations' of our local and federal elected officials.

Far from "aggressively supporting proactive public involvement," our elected officials, who are part of the process, have acted contrary to FTA policy by misleading the public about the prospects for rail transit in that:

- They continually allude to the idea that building rail transit will result in traffic congestion relief when even Parsons Brinckerhoff[xxiii] says it will not affect traffic congestion in addition to there being no evidence from any other metro area that such is the case.[xxiv]
- They relentlessly use the term 'light' rail when, in reality, they are pushing a 'heavy' rail line.[xxv]
- They imply that the half-percent increase in the county General Excise Tax will be sufficient to pay for rail.[xxvi]

The public frustration with the lack of information was evident from the coverage of the scoping meetings by our newspapers. As the head of the Outdoor Circle's environmental committee said, "It seems to have been designed in a way to limit public interaction"[xxvii]

The net result of Parsons Brinckerhoff and DTS's outreach efforts is that the public believes that a rail transit line will significantly reduce traffic congestion and that it will only cost a half per cent increase in the GE tax. Neither the City nor DTS have made any effort to dispel these myths.

Summary:

The culmination of the current process will be a request by DTS to advance into alternatives analysis. FTA then "reviews this request and supporting technical documentation to determine whether system planning requirements have been met and that the threshold criteria for initiating alternatives analysis have been satisfied." (PTMTTP, Part I, page 2-12.)

Clearly, on the four counts enumerated here, the process is grossly flawed:

- Little, if any, quantitative information has been developed, let alone given to the public.
- The transportation problem is inadequately defined and there has been no evaluation of how the alternatives address specific transportation problems.
- The alternatives are insufficient and Parsons Brinckerhoff's decision prior to the Scoping Meeting to eliminate the reversible HOT lanes alternative was completely unjustified. They made this decision without any disclosure of the impacts of HOT lanes on traffic congestion, patronage, cost, or any other quantitative details that would allow the public to understand the decision. Nor did Parsons Brinckerhoff explain the selection criteria used in eliminating HOT lanes — let alone the weighting of the criteria in the scoring process.
- The process so far makes a mockery of "public involvement" as spelled out in FTA guidance and as defined in the preamble to Hawaii's Uniform Information Practices Act:

  [§92F-2] Purposes; rules of construction. In a democracy, the people are vested with the ultimate decision-making power. Government agencies exist to aid the people in the formation and conduct of public policy. Opening up the government processes to public

> scrutiny and participation is the only viable and reasonable method of protecting the public's interest. Therefore the legislature declares that it is the policy of this State that the formation and conduct of public policy—the discussions, deliberations, decisions, and action of government agencies—shall be conducted as openly as possible.

Accordingly, we believe that Parsons Brinckerhoff, OMPO, and DTS should revisit the process leading up to the Scoping Meeting and redevelop the alternatives according to FTA rules and guidance. Only then can our community have a Scoping Meeting in which the public will be involved according to both the letter and spirit of the law.

Sincerely,

HONOLULUTRAFFIC.COM

Cliff Slater
Chair

cc: Ms. Donna Turchie, Region IX, Federal Transit Administration
Mr. Toru Hamayasu, Chief Planner, Honolulu DTS

Endnotes:

[i] Scoping Meeting, page 4.3.

ii "1.2.1 Systems Planning. Systems planning refers to the continuing, comprehensive, and coordinated transportation planning process carried out by metropolitan planning organizations - in cooperation with state Departments of Transportation, local transit operators, and affected local governments - in urbanized areas throughout the country. This planning process results in the development of long range multimodal transportation plans and short term improvement programs, as well as a number of other transportation and air quality analyses." Procedures and Technical Methods for Transit Project Planning (PTMTPP), Part I, 1."

iii Scoping Information package. December 5, 2005. page 3-1.

iv According to Braden Smith, CFO of Tampa-Hillsborough Expressway Authority (813) 272-6740 the Tampa cost should have been $28 million a mile for the three-lane elevated highway and not the $46 million a mile it is costing. An expensive error made by wrong assumptions about the soil substrate by the designer caused the cost overrun.

v Letter from the Office of Information Practices to Slater and Lum.

vi http://www.fhwa.dot.gov/ctpp/jtw/contents.htm

[vii] http://the.honoluluadvertiser.com/article/2005/Aug/22/ln/FP508220329.html

http://www.co.honolulu.hi.us/nco/nb18/05/18marmin.htm

http://the.honoluluadvertiser.com/article/2003/Oct/28/ln/ln03a.html

http://the.honoluluadvertiser.com/article/2005/Mar/22/ln/ln20p.html

http://starbulletin.com/2003/10/28/news/story2.html

[viii] http://www.honolulutransit.org/pdfs/scoping_info.pdf

[ix] http://www.fhwa.dot.gov/ctpp/jtw/contents.htm

x Honolulu Advertiser article, December 14, 2005.

[xi] PTMTPP, Part II, Sec. 9.

xii Seminar on Urban Mass Transit (transcript). Office of the Legislative Auditor, State of Hawaii. January 1978. Dr. John Kain, Chairman, Dept. of City and Regional Planning, Harvard University.

xiii Quoted from "An Evaluation of the Honolulu Rapid Transit Development Project's Alternative Analysis and Draft Environmental Impact Statement." Hawaii Office of State Planning and University of Hawaii. May 1990. Robert Cervero, Professor of Urban and Regional Planning at the University of California, Berkeley, and a member of the Editorial Board, Journal of the American Planning Association.

xiv An Evaluation of the Honolulu Rapid Transit Development Project's Alternative Analysis and Draft Environmental Impact Statement. Hawaii Office of State Planning and University of Hawaii.May 1990.

xv http://www.hhh.umn.edu/centers/slp/projects/conpric/index.htm

xvi State FEIS for the Bus/Rapid Transit Program, November 2002. Prepared by Parsons Brinckerhoff Quade & Douglas. p. 2-4.

xvii http://www.honolulutraffic.com/lexuslane.htm

xviii Orange County's SR-91 lanes are not dynamically priced as are those of the San Diego I-15. However, the SR-91 administrators try to emulate dynamic pricing with fixed prices which allows us to examine what Hawaii prices might look like by time of day. http://www.91expresslanes.com/tollschedules.asp

[xix] http://www.honolulutraffic.com/railspeed.pdf

xx Dr. Melvin Webber, UC Berkeley. Address to the Governor's Conference on Videotex, Transportation and Energy Conservation. Hawaii State Dept. of Planning and Economic Development. July 1984.

xxi "An Evaluation of the Honolulu Rapid Transit Development Project's Alternative Analysis and Draft Environmental Impact Statement." Hawaii Office of State Planning and University of Hawaii. May 1990.

xxii Kain, John F. "The Use of Straw Men in the Economic Evaluation of Rail Transport Projects." American Economic Review, Vol. 82, No. 2, Papers and Proceedings of the Hundred and Fourth Annual Meeting of the American Economic Association (May, 1992) , pp. 487-493.

[xxiii] http://starbulletin.com/2005/12/14/news/story02.html

http://the.honoluluadvertiser.com/article/2005/Dec/14/ln/FP512140342.html

xxiv This video of, Mayor Hanneman and Rep. Neil Abercrombie's city hall "Traffic sucks!" rally held on December 5th, 2005, typifies the grossly misleading statements emanating from our elected officials. http://mfile.akamai.com/12891/wmv/vod.ibsys.com/2005/0707/4695365.200k.asx

"Judging by how much traffic has worsened in just in the past few years, that's probably a conservative prediction. The only way to prevent it is to act now to address the problem. Our

quality of life is at stake. Rail transit is a key element in the solution." Congressman Neil Abercrombie. Honolulu Advertiser. April 17, 2005

"Hannemann said the yet-to-be-determined form of transit would run from Kapolei to downtown and the University of Hawai'i-Manoa. He said the system will help all parts of the island, easing traffic overall because 'there'll be less cars on the road.'" http://the.honoluluadvertiser.com/article/2005/May/12/ln/ln02p.html

Mayor's Press Secretary: "Slater misrepresents just about everything Mayor Mufi Hannemann, Transportation Services Director Ed Hirata and other supporters of transit have said, from the timing of federal requirements to tax calculations, highway capacity and a rail system's potential to ease traffic congestion." http://the.honoluluadvertiser.com/article/2005/Aug/10/op/508100321.html

Transcript of Councilmember Barbara Marshall questioning U.S. Rep. Neil Abercrombie (D-Hawaii) http://hawaiireporter.com/story.aspx?696a58e3-9a81-411e-b977-2688f5595685

"Mayor Mufi Hannemann chided Lingle at the rally and said the city needs a rail system to alleviate increasing traffic congestion. U.S. Rep. Neil Abercrombie, D-Hawaii, also blasted a possible veto and said that he and the rest of Hawaii have had enough of the traffic problems. He said commuters are fed up and don't need anymore "Lingle lanes" filled with traffic congestion." http://www.bizjournals.com/pacific/stories/2005/07/04/daily18.html?t=printable

xxv DTS and elected officials continually refer to "light rail" despite constant criticism from us and others.

xxvi Half per cent will pay for about one-third of the projected rail line according to our calculations. Mayor Hanneman originally asked for a full one percent at a time when he was seeking a shorter $2.7 billion line from Kapolei to Iwilei. Now he plans extending it to UH and Waikiki and the tax increase has been reduced to a half of one percent.

xxvii http://starbulletin.com/2005/12/14/news/story02.html

http://the.honoluluadvertiser.com/article/2005/Dec/14/ln/FP512140342.html

TRANSIT ADVISORY TASK FORCE

c/o Honolulu City Council
530 S. King Street, Room 202
Honolulu, HI 96819
Phone: (808)523-4139

Report of the Transit Task Force Technical Review Subcommittee
Construction Cost

The purpose of this report is to:

1. Determine if the estimated costs for the construction of the Managed Lane and Fixed Guideway Alternatives in the Alternatives Analysis Report for the Honolulu High-Capacity Transit Corridor Project are reasonable for the purposes of the report, and
2. Compare the estimated cost of the Managed Lane Alternative with the cost for the construction of the high-occupancy toll lanes on the Tampa-Hillsborough County Expressway.

In addition to the Alternatives Analysis Report, information was obtained from:

1. Toru Hamayasu, Department of Transportation Services
2. Clyde Shimizu, Parsons Brinkerhoff Quade and Douglas
3. Martin Stone, Tampa-Hillsborough County Expressway Authority
4. Paul Santo, Highways Division, Hawaii State DOT

Capital costs in the Alternatives Analysis Report for the construction of the Managed Lane Alternative are estimated at $2.6 billion; capital costs of $3.6 billion are projected for the 20-mile Alignment of the Fixed Guideway Alternative. The actual construction cost reported for the Tampa high-occupancy toll lanes was $300 million for construction (including both at-grade and elevated sections), plus $120 million to correct an engineering error in the construction of foundations for some of the support piers.

Both the Managed Lane and the Fixed Guideway Alternatives estimates use the same unit cost prices and cost calculation categories. These standardized cost categories are prescribed by the Federal Transit Administration to facilitate review of project cost information from all projects seeking Federal funding. The unit cost data (cost per cubic yard of concrete, cost per ton of reinforcing steel, etc.) were obtained from the most recent large-scale construction projects on Oahu, such as the construction of the Waimalu section of the H-1 highway viaduct widening, completed last year. DTS' consultants, Parsons Brinckerhoff, also made use of the U.S. Navy's unit cost construction cost data for Hawaii. Labor and other costs from the H-1 Waimalu Viaduct project were also used as inputs for Alternatives cost estimates. The cost per square foot of the Waimalu Viaduct, about $500 per square foot, was considered but not relied on because this work involved widening an existing elevated highway structure, which is known to be more expensive than new construction. The Alternatives Analysis data

yield an estimated cost to construct elevated highway structures on Oahu at $330 per square foot, and $390 per square foot in urban areas.

Construction costs for the elevated guideway needed for the Managed Lane Alternative were calculated on the same basis as the construction costs for the guideway structure for the Fixed Guideway Alternative. Both Alternatives are designed to meet AASHTO design standards for elevated highway structures, as was the Tampa tollway. As previously stated, costs for both Alternatives were calculated using the same per-unit cost elements (for concrete, steel, labor, etc.). Because the elevated structure for the Managed Lane Alternative would be 36 feet wide for its two travel lanes, whereas the structure for the fixed guideway would be only 26 feet wide, different diameter piers are necessary for each (8 feet versus 6 feet in diameter). However, where the managed lanes require only a single lane (e.g., an access/exit ramp), a 6 foot diameter support pier would be used, similar to and costing the same as the piers used for the fixed guideway. The span length between piers is 120 feet for both alternatives' structures. Portions of the structure for the fixed guideway will be significantly taller, 90 feet tall in some places, than the Managed Lane structure.

Capital cost for the Fixed Guideway Alternative would be approximately the same as the guideway cost for the Managed Lane if the following fixed-guideway-specific adjustments were made: (1) Subtract vehicle costs, system infrastructure cost, cost for downtown utilities relocation (the proposed Managed Lane Alternative does not reach downtown, where most utilities relocation costs are incurred); (2) Adjust for construction cost differences (e.g., structure width, different diameter piers); (3) Adjust for the Fixed Guideway Alternative's longer length and increased height.

Alternative lengths of the fixed guideway that could be built to fit budget limitations were addressed with the Department of Transportations Services and its consultant. For instance, $3 billion would build a system from UH at Manoa to Kaahumanu Street on Kamehameha Highway; $3.2 billion dollars would reach Acacia Road at Kamehameha Highway. If the Salt Lake Boulevard alignment were used, $3.2 billion would reach Leeward Community College but would not reach the Navy Drum Storage Area, which is planned for the fixed guideway storage and maintenance yard. An Ala Moana Center to UH link is estimated to cost $540 million and Ala Moana Center to Waikiki link is $490 million. The Department of Transportation Services has not made a detailed analysis of any Minimal Operating Segment (MOS) other than the 20-mile alignment discussed in the Alternatives Analysis.

According to DTS, the Navy Drum Storage site is the site closest to downtown that is feasible for the maintenance/vehicle storage yard, a necessity for a fixed guideway system. DTS reportedly looked at other possible sites, including the former Costco site, and rejected them because they were not large enough, or otherwise unacceptable. The lack of a suitable yard site closer to downtown requires the fixed guideway to

extend at least to the Navy Drum Storage site in the Ewa direction, thereby limiting the length of the 20 mile alternative guideway in the Koko Head direction.

The committee suggests that DTS reconsider the use of the Costco site as a maintenance/storage facility, at least on a temporary basis. This would avoid having the guideway end points dictated by the storage yard consideration. If the Costco site is not large enough by itself, perhaps the Federal Department of Defense would consider making available DOD-owned land adjacent to the Costco site, either on a temporary or permanent basis. Alternatively, would a smaller yard be adequate for the first years of fixed guideway operations, perhaps making use of unused running track for vehicle storage and limited vehicle maintenance? We understand that the Miami heavy rail system operated without a storage/maintenance facility for the first year or so after that system opened, and instead made use of available track for off-peak vehicle storage and maintenance.

Testimony before the Task Force has included repeated comparison of the actual cost to construct a three lane partially elevated toll highway in Tampa, Florida versus projected construction costs for necessary for the Managed Lane and Fixed Guideway Alternatives. The following comparison of the costs for the Managed Lane Alternative and the Tampa high-occupancy toll lanes is based on information obtained from the Department of Transportation Services, the Tampa-Hillsborough County Expressway Authority, and the Bridge Section of the Hawaii State Highways Division. The Managed Lane Alternative is 15.8 miles long with two lanes, built entirely on elevated structures. The Tampa high-occupancy toll (HOT) facility is 9.4 miles long, of which 4 miles is at grade, and approximately 5.4 miles is built on elevated structures. The Tampa HOT has three 12-foot lanes with two 10-foot shoulders, and is approximately 59 feet wide and was completed in 2004. The Managed Lane Alternative (assuming reversible lanes – both lanes operating Koko Head direction in the morning rush hour, and both lanes operating Ewa in the evening) is 36 feet wide (two 12-foot lanes, one 10-foot shoulder and one 2-foot shoulder).

Dr. Stone recommended that the proposed Managed Lane Alternative should be widened to three lanes based on the experience of the Tampa Expressway Authority. Further, the lanes should be reversible to gain the advantage of all three lanes in the heavily traveled direction during morning and evening peak hours. He further stated that there were insufficient access/exit ramps in the Honolulu proposal and expressed the opinion that the additional lanes and access/exit ramps would not add substantially to the cost of the project. In his view, he felt the cost estimate in the Alternatives Analysis was far too high.

Paul Santo stated that there is a substantial difference in cost for bridge construction between Hawaii and the mainland US. The State DOT Bridge Section presently uses $400 to $500 per square foot for planning purposes and expects the price will continue to rise and approach $1000 per square foot. By comparison, he said that most highway

agencies on the mainland use $100 to $200 per square foot with some even below $100. He believes the high cost in Hawaii is due to its location and the lack of competition. For instance, there is only one precast concrete plant in Hawaii to produce bridge girders. He understands some general contractors in Hawaii look to shipping girders from the mainland as was done by the contractor for the Ford Island causeway in Pearl Harbor. He further believes the cost for construction of the structures is impacted by the additional cost of utility relocation where the alignment of the facility follows existing rights-of-way, such as the Farrington Highway and Kamehameha Highway corridor for both the Managed Lane and Fixed Guideway Alternatives. In addition, construction costs are higher where work is accomplished within existing highways with high traffic volumes whereas the Tampa HOT lanes were built within an existing median, which appears to be nearly 30 feet wide.
Guideway construction cost estimates developed for the Alternatives Analysis are also high compared to Tampa high-occupancy toll lanes costs because the Alternative Analysis' projected costs include a 30% escalation for "soft costs" (engineering costs) and a 25% escalation on all costs for contingencies. The Tampa HOT cost ($300 million) represents actual construction costs only (including 16% for actual engineering costs), and was for a project that started in 2003. Clyde Shimizu pointed out that the per square foot costs of H-3 viaducts in 1990 ($180) exceeded the Tampa tollway costs incurred only a few years ago.

Since the Tampa tollway was built in the median of the existing expressway, there were no rights-of-way costs incurred. Where the Fixed Guideway or Managed Lane are built within existing State or City rights-of-way, land will be made available for the structures at no cost to the project.

The Tampa high-occupancy toll lanes do not cover capital and operating costs through HOT lanes tolls. Rather, the combined revenues from the expressway and the HOT tollway are used to meet operating and capital costs. Tollway fees are expected to rise from $1 to $1.50 next year. Bonds issued to finance construction of the original expressway, which opened for revenue service in 1975, have now been largely paid off or the debt refinanced, freeing up toll revenue from both the original expressway and the HOT lanes to subsidize the HOT lanes' construction costs.

In conclusion, the cost estimates for the Managed Lane and Fixed Guideways Alternatives in the Alternatives Analysis Report are reasonable. Further, a valid comparison of the costs for the Tampa tollway and the proposed Managed Lane cannot be made without substantial adjustments for differences in construction unit costs.

From: Martin Stone, Ph.D., AICP
Director of Planning
Tampa-Hillsborough County Expressway Authority

To: The Honolulu Advertiser and other interested citizens of Honolulu

Recent comments in the Honolulu Advertiser by the chief planner of Honolulu call into question the objectivity of the City and its consultants in their performance of a very expensive transportation alternatives evaluation being mostly paid for by the federal government.

As the public official responsible for planning Tampa's elevated Reversible Express Lanes project, I am astonished that a Hawaiian public official would ***intentionally misrepresent the facts associated with the cost and operation of our project*** – and how a similar HOT lane project might provide true congestion relief for Honolulu at an affordable price.

Two weeks ago, three Honolulu City Council members visited Tampa to see our project and learn the truth. Not only did they view the project close up but they also had the opportunity to meet the people who conceived, financed, designed, and constructed the project. Chairman Donovan Del Cruz and Councilmen Todd Apo and Charles Djou all had a chance to see first-hand the realities of our project.

First, it is completely false to suggest that our project costs "skyrocketed" to $420 million from the original $300 million estimate. The truth is that a design error by an engineer resulted in 155 bridge foundations being constructed smaller then they should have been. It cost $120 million extra to properly reinforce those foundations. Had the licensed engineer designed the foundations correctly, the additional concrete and steel required during the initial construction would have cost only a few million more than the original contract price. But, to ensure that we are open and honest about our project, we always include the additional $120 million and the reasons for it when we show people our price tag. And, the original cost of the elevated portion of our project (5.5 miles long) was less than $120 million of the total project. So, even with the foundation reinforcements, the entire elevated part of our express lanes only cost about $240 million – that's less than $14 million per lane mile for 27.5 lane miles of elevated concrete segmental bridge portion of the express lanes.

Your city's non-accredited chief planner knows this. But it seems he does not want you to know.

It is also totally false that our elevated express lanes are only handling 4,000 trips a day. The project is actually handling three times that much even though we are not in full operation because we are still finishing the final construction punch-list. And, we made sure to build plenty of additional capacity to accommodate future growth (it would have been irresponsible for us not to have planned for the future too).

Your city's non-accredited chief planner knows this too. He just does not want you to know.

And, to say that our project is not meeting its financial obligations and we are being "heavily subsidized by revenues from other toll roads" is simply a lie. The Tampa Hillsborough County Expressway Authority owns only one road – and our elevated Reversible Express Lanes are part of that road. Our agency is completely self-funded. We operate with no tax dollars. All of our funding comes from revenue bonds and loans that are paid back by the tolls we collect from our customers. And, no other toll road subsidizes us. Last year (our 30th year of operation), the Lee Roy Selmon Crosstown Expressway handled more than 34 million trips with annual revenues of

approximately $32 million. Within the past six years, the Authority refinanced all of the expressway debt with two new series of revenue bonds to pay for the construction of the Reversible Express Lanes project. Wall Street bond underwriters and sellers will not handle a $400 million bond issue for an organization that cannot pay its debt. Anyone taking the time to read the annual traffic and revenue reports published by the Expressway Authority auditors and by the Florida Department of Transportation would know this. Under Florida's Sunshine Law, all of this financial information is available to anyone.

Apparently your non-accredited chief planner either didn't do his homework or he is again attempting to mislead you.

Actually, it's worse that that. The intentional distortion of the financial condition of our toll road is indicative of someone who desperately wants to manipulate public opinion in favor of a preordained outcome. This type of dishonesty is not permitted by the canon of ethics of the American Institute of Certified Planners, but then again, since your chief planner is not a registered AICP member, he is not required to meet any professional planning standards of objectivity in the public interest. However, he is a member of the American Society of Civil Engineers (ASCE) and they have a well-defined Code of Ethics for their member's activities. ASCE Fundamental Principle #2 calls for engineers to uphold the integrity, honor and dignity of the profession by "being honest and impartial and serving with fidelity the public…" and Canon #3 says, "Engineers shall issue public statements only in an objective and truthful manner … and shall not participate in the dissemination of untrue, unfair or exaggerated statements regarding engineering."

The statements presented regarding our organization and our projects are all virtually untrue or exaggerated.

The biggest dishonesty of all, however, is the claim by your chief planner and his hired guns that our elevated project was used as the model for the HOT lane alternative they are using as a comparison to the fixed rail system. It is <u>completely dishonest</u> to say the elevated HOT lane in your transit alternatives analysis is similar to our elevated reversible lanes. And, it is this dishonesty that results in your HOT lanes costing $2.6 billion instead of the less than $1 billion that a true copy of our project would cost.

Remember, anyone wanting to control the outcome of the alternatives analysis to favor the train would most certainly want to find a way to boost the cost of the elevated road concept.

Other than both being built on a bridge, there is virtually nothing the same in the design of the two projects. Our bridge has three travel lanes. The Honolulu is only two lanes wide. Because of its unique use of slip ramps for access, our project does not require any interchanges. Your HOT lane alternative has a number of unnecessary and expensive interchanges. Your project also includes a number of unnecessary and very expensive bus stations to be built on the elevated HOT lane structure. Why would you need them? Buses pick you up in your community and use the roadway for the trip. If the project were designed properly, buses would simply use the on & off ramps to access local bus stops for passenger pickup and drop-off. These unnecessary bus stations really boost the cost of the HOT lane alternative. And, the HOT lane alternative also includes costly park & ride lots – another unnecessary component for this type of facility. All of these unnecessary elements add over a billion dollars of cost to the HOT lanes and therefore make the project look much less attractive.

And, the cost estimate to reproduce our elevated reversible lanes project in Honolulu was not done on the back of an envelope. Our most recent project estimate (September, 2006) to determine the insurance replacement cost for our bridge was computed by our Authority's Chief Financial Officer, a man with a total of 30 years experience financing transportation - 22 of which were as the financial advisor to Florida's Governor and CFO for the Florida Department of Transportation Central Office. His estimate to build our 5.5 miles of bridge with today's material and labor costs is $175 million. Extending that to 14 miles in length for the Honolulu HOT lanes alternative would bring the cost to $450 million. You can add any percentage you wish to compensate for higher construction costs in Hawaii, but it is easy to see why this project should not cost you more than $1 billion.

Your city's chief planner knows this too. He has seen the cost estimates. He just doesn't want you to know.

Something else he doesn't want you to know. All of the cars that would use the HOT lanes to get to downtown are not new additional trips into the City. They represent a redistribution of the same trips you would have based on your population and employment. The HOT lanes won't produce new trips. They simply would divert trips away from your existing congested highways thus making the entire system work more efficiently. Growth in population, employment and commercial development creates more trips. The HOT lane trips also don't create more parking problems in downtown Honolulu because they are the same cars that would be parking no matter which roadway they use to get to the City. And, yes, anyone designing a new HOT lane will have to solve how traffic can best move in and out of the City. This would not be accomplished by dumping the traffic into only one location, but likely would involve multiple entrances and solutions that could address other traffic problems as already suggested by the University of Hawaii Civil Engineering department. New gateway entrances into Honolulu would also provide opportunities for new private investment within your downtown.

Prior to opening our express lanes, the average 10-mile trip in the morning peak-hour took over thirty minutes. Since we opened for interim operations, we have achieved a 50% split in the peak-hours between our new Reversible Express Lanes and our existing expressway lanes. This has resulted in a complete balancing of our traffic between our upper and lower lanes with no congestion for any of our customers and an average trip time of 10 minutes for the 10 miles for everyone. The express lanes are already handling enough traffic volume in our morning peak hours to equal having an extra lane constructed on our Interstate into downtown Tampa (about 2,000 per lane per hour).

In addition, the elevated reversible expressway has been so successful that it is attracting 2,000 additional daily trips away from other non-tolled parallel roads. City of Tampa traffic managers report that all three parallel non-tolled roads are operating better in the peak hour because of diversions to our new express lanes. We couldn't be more pleased with the project -- it is doing exactly what we thought it would -- providing a safe, reliable, convenient, stress-free trip for people driving into and out of our city every day during what used to be terrible traffic congestion within our corridor. And, our local transit agency is reporting a 20% increase in ridership on the express bus routes on our facility within less than three months.

Oh, by the way, the toll is presently $1.00 for the entire trip on the express lanes. However, we will be raising tolls next year to $1.50. Now about the toll increase. Our agency normally raises its tolls about once every 8-10 years to keep up with the rising costs associated with inflation. Our last increase raised our tolls from $.75 to $1.00 for electronic toll customers in 1999. Our

finance plan, established many years ago for our agency, identified next year's toll rate to go to $1.50 for electronic customers as a part of our standard toll rate policy.

Are we using the money to pay the debt service for this project as well as our operating cost? Of course we are. That's how toll roads work. We build the road today for our needs today and tomorrow with money that we borrow and then pay back over time, just like the mortgage on your house. We get an asset with a useful life of 75-100 years - and we get to use that asset immediately to address our problems today and in the future - and we pay for it as we use it. And, when we reach positive cash flow on a project, we typically use that money to finance even more transportation projects. That is a financial approach long ago adopted by the State of Florida. In fact, every new highway built in our State during the past 15 years has been built by a toll agency, because, just like Hawaii, virtually all of our fuel taxes are dedicated to maintaining or improving the existing road system.

We have thousands of people who vote with their pocketbooks every day to use our road. But, if people don't want to pay for using our tollway, they don't have to. The key is they get to choose, unlike projects that many people do not want – projects that benefit only a few but are paid for by all through some general tax scheme. Toll roads are not forced on anyone. They serve those willing to pay. But, the entire community benefits, including those who do not use the road, because we improve traffic congestion by diverting traffic away from non-tolled highways and streets.

If you were to build HOT lanes in Honolulu, your public and private transit providers and high occupancy users would have a facility that will allow them to guarantee their arrival schedules. Transit riders would receive reliable, efficient service and automobile drivers would be able to take advantage of that capacity for a very reasonable price at their discretion. Those who decide not to pay to use the HOT lanes would also benefit from the reduced congestion in the non-tolled lanes. The elimination from non-tolled highways of traffic comprised of buses, taxis, vanpools and carpools along with those auto drivers who decide to pay, will make things better for everyone.

We think that's pretty terrific. Our customers think so too. And, if anyone on the City staff tells you a different story, they are either sadly misinformed or they are intentionally falsifying the facts to achieve a specific end.

June 20, 2006

Mr. Cliff Slater
Honolulutraffic.com
PO Box 15502
Honolulu, Hawaii 96830

Subject: Honolulu High-Capacity Transit Corridor Project Scoping Comments

Dear Mr. Slater,

Mahalo for submitting comments during the scoping process for the Honolulu High-Capacity Transit Corridor Project. Your comments, along with over 500 others, were reviewed and considered during the development of the final purpose and need, alternatives being evaluated in the Alternatives Analysis, and scope of environmental analysis for the project. The outcome of the scoping process is summarized in the scoping report which is available for review at the project website www.honolulutransit.org. All of the comments received during the scoping process are included in the appendices to the report, and also may be downloaded.

The No-build, Transportation System Management, Managed Lanes and Fixed Guideway alternatives will be evaluated in detail in the Alternatives Analysis. Once the Alternatives Analysis is complete, sufficient information will be available to select the optimal alternative for the corridor. A two-lane reversible option for the Managed Lanes Alternative, matching what you have proposed, has been added to the range of alternatives being evaluated in the Alternatives Analysis.

Project costs and operating revenues will be estimated as part of the financial analysis completed during the alternatives analysis process. Ridership forecasts are currently being developed to support the Alternatives Analysis. Transit travel time and reliability will be major factors in evaluating the performance of the various alternatives.

Environmental and social impacts and benefits of each proposed alternative will be addressed in the Alternatives Analysis and draft Environmental Impact Statement. They will be considered in the comparison of overall costs and benefits of the project alternatives.

The Honolulu High-Capacity Transit Corridor Project is evaluating one aspect of island-wide transportation needs in coordination with the Oahu Metropolitan Planning Organization, which is responsible for integrated transportation planning. The Honolulu High-Capacity Transit Corridor Project analysis is meant to evaluate project alternatives that may be constructed within the authorization of Act 247, enacted by the Hawaii state legislature in 2005. The act prohibits the construction of a non-transit project with the authorized excise-tax surcharge. Projects with the purpose of providing roadway mobility for automobiles and commercial vehicles are outside of the authorization of Act 247; therefore, they will not be considered for the Honolulu High-Capacity Transit Corridor Project.

Comments on how information was presented, comments were collected, and how the scoping process was conducted were reviewed and will be considered during future phases of the public involvement process. The project team has begun an extensive public information process to provide project details prior to selection of a locally preferred alternative (LPA). Public feedback will be solicited prior to selection of the LPA.

A transit system is only a portion of the entire transportation system. While the transit system will reduce the number of drivers on congested roadways within the corridor, the corridor is expected to continue experiencing growth in travel demand. The transportation corridor between Kapolei and the University of Hawaii at Manoa will continue to experience substantial traffic congestion; however, congestion in the corridor is expected to decrease somewhat after the system opens, and grow at a reduced rate after that time because of automobile trips diverted to transit. Travel demand projections will be developed for the Alternatives Analysis.

Sincerely,

MELVIN N. KAKU
Director

April 13, 2007

Dept. of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813
Attn: Honolulu High-Capacity Transit Corridor Project
VIA email: mkaku@honolulu.gov

Dear Mr. Kaku:

Following are our our comments on the Notice of Intent (NOI) and Scoping Information Package (SIP), issued March 15, 2007.

We have attached to the cover email for your convenience, the Transit Advisory Task Force Final Report (TaskForceReport.pdf), Dr. Stone's letter to the Advertiser (StoneTampa.pdf) and your letter to me dated June 20, 2006 (cliffslater.pdf), which are files referenced in the comments.

These comments on the latest NOI and SIP should be read in conjunction with our earlier comments on the first NOI and SIP of December 5, 2005, attached to the cover email as scoping_comments_3.pdf.

We would appreciate it if you would ask Parsons Brinckerhoff to prepare responses for you that address the issues we raise. The comments that we received on January 27, 2007 (dated June 20, 2006) did not address the vast majority of our concerns.

Sincerely,

Sincerely,
HONOLULUTRAFFIC.COM

Cliff Slater
Chair
CDS/rrs
Att:

cc: Ms. Donna Turchie
Federal Transit Administration, Region IX
201 Mission Street, Room 1650
San Francisco, CA 94105
VIA email: Donna.Turchie@fta.dot.gov

Comments on the 2nd Scoping Information Package and 2nd Notice of Intent

We find the second Notice of Intent (NOI2) and the second Scoping Information Package (SIP2) issued jointly on March 15, 2007, by the Federal Transit Administration (FTA) and the City and County of Honolulu (City) to be unsatisfactory for the following major reasons:

- The issuance of two NOIs and SIPs is not understandable.
- They contain unsatisfactory purpose and needs statements.
- They have excluded the Managed Lane Alternative (MLA) without good cause.

The issuance of two NOIs and SIPs.

Neither the Federal Transit Administration (FTA) nor the City and County of Honolulu (City) has made any attempt to clarify why FTA issued NOI2. While the NOI of December 7, 2005 (NOI1), initiated the National Environmental Protection Act (NEPA) process, the NOI2 of March 15, 2007, informs us that the NEPA review is "initiated through this scoping notice." Does this mean the old NOI is cancelled? Have we not been in the NEPA process since December 2005?

We also see from SIP2 that scoping under Hawaii Revised Statutes 343, the Hawaii Environmental Protection Act (HEPA), was completed in 2006 and that this new scoping, NOI2 and SIP2, is only to satisfy NEPA. However, NOI1 and the Scoping Report of April 6, 2006, both stated that the scoping at that time was being done under NEPA. We have asked the City for clarification without result.

There has obviously been insufficient "public involvement," as required by SAFETEA-LU, if we cannot even find out whether the NEPA process started on December 5, 2005, or March 15, 2007.

Further, we did not receive any response to HONOLULUTRAFFIC.COM'S 13-page comments on NOI1 and SIP1, dated January 9, 2006, until February 22, 2007. Even then it was, for the most part, the usual Parsons Brinckerhoff (PB) boiler plate with few of the specifics addressed.[1]

Unsatisfactory purpose and needs statement

NOI2 and SIP2 have failed to comply with SAFETEA-LU in that they have not involved the public in explaining the importance of the purpose and need statement and that the statement should be what the alternatives must be measured against.

> "PARTICIPATION- As early as practicable during the environmental review process, the lead agency shall provide an opportunity for involvement by … the public in defining the purpose and need for a project."[2]

> "Local officials may choose a different approach, so long as it is technically sound and can accurately measure project merit relative to the purpose and need for the project."[3]

The frustration with the lack of public participation was evident from the coverage of the scoping meetings by our newspapers. As the head of the Outdoor Circle's environmental committee said, "It seems to have been designed in a way to limit public interaction"[4]

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1 Letter signed by Mr. Melvin Kaku, DTS Director, sent to me on 2/26/2007 by Mr. Lawrence Spurgeon of Parsons Brinckerhoff but dated 6/20/2006, attached to the cover email.

2 SAFETEA-LU, Sec. 6002, (d)(7)f(1).

3 Excerpt from the FTA Evaluation of Evaluation of Alternatives 9.4.3 :

4 http://the.honoluluadvertiser.com/article/2005/Dec/14/ln/FP512140342.html
http://starbulletin.com/2005/12/14/news/story02.html

The City and FTA have not provided a purpose and need statement in clear English even though the SAFETEA-LU statute requires that,

> "The statement of purpose and need shall include a clear statement of the objectives that the proposed action is intended to achieve ..." (emphasis added).[5]

Instead,

> "A mass of Latin words falls upon the facts like soft snow, blurring the outline and covering up all the details. The great enemy of clear language is insincerity. When there is a gap between one's real and one's declared aims, one turns as it were instinctively to long words and exhausted idioms." George Orwell. *Politics and the English Language.*

Statements used in NOI2 and SIP2 are ambiguous at best, and, at worst, give the impression that they were designed to mislead. Take, for example, the following two sentences:

> "Improved mobility for travelers facing increasingly severe traffic congestion." SIP2

> "Implementation of the project, in conjunction with other improvements included in the ORTP, would moderate anticipated traffic congestion in the corridor." NOI2 & SIP2.

This jargon lulls the average citizen into believing that the primary purpose of the Honolulu High-Capacity Transit Corridor Project (Project) is to reduce traffic congestion from current levels. When does one hear the ordinary citizen use words like "mobility," "travelers," and "moderate anticipated traffic"?

If the intent was to involve and enlighten the public, the writer would quite clearly state, "It is not the intent of the Project to reduce traffic congestion in the future to be less than it is today.[6] When the Kapolei to UH rail transit line is up and running, traffic congestion will be worse than it is today, though somewhat less than what it might be without the rail line." No statement of such clarity exists in NOI2 or SIP2.

Beginning with NOI1 and SIP1, followed by the Draft Oahu Regional Transportation Plan (Draft ORTP), the Alternatives Analysis (AA), the final ORTP, and now NOI2 and SIP2, our City transportation officials, and PB have misled the public into believing that rail transit will relieve congestion. Further, PB and the City have been aided in their endeavors by the 'strategic misrepresentations' of our local and federal elected officials.[7]

Far from "aggressively supporting proactive public involvement," our elected officials, have continually alluded to the idea that building rail transit will result in traffic congestion relief even though the Alternatives Analysis clearly shows that traffic congestion will get significantly worse with the rail transit alternative.[8]

The net result of the current 'purpose and need' statement is that the public misunderstands the purpose of the rail transit proposal in the Project corridor. They believe it is to reduce the current traffic congestion to a more bearable level.

> "SAFETEA-LU requires a clear statement of identified objectives that the proposed project is intended to achieve for improving transportation conditions. The objectives should be derived from needs ..." Question 33. Sec. 6002 final guidance.

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5 SAFETEA-LU, Sec. 6002, (d)(7)f(3).

6 "Projects with the purpose of providing roadway mobility for automobiles and commercial vehicles are outside of the authorization of Act 247; therefore, they will not be considered for the Honolulu High-Capacity Transit Corridor Project." Kaku to Slater letter of 6/20/2006.

7 See Appendix A, p. 10.

8 See AA, tables 3-12 & 3-13.

The net result of Parsons Brinckerhoff and DTS's outreach efforts is that the public believes that the 'need' is to significantly reduce traffic congestion and that the 'purpose' of the rail transit Project is to do just that. Neither the City nor PB has made any effort to dispel this myth. A survey of public opinion would make this quite clear.

MLA denied fair and equitable treatment

We object to your failing to include the MLA in NOI2 and SIP2 and ask that they be amended to include a properly defined MLA, modified to satisfy Professor Prevedouros concerns together with the concerns expressed in Appendix 3 of the TATF Report, and then it should be republished.

While FTA does not evaluate the City's AA, it uses the AA's conclusions to eliminate the MLA from NOI2 and determine that it was "eliminated for good cause on the basis of the Alternatives Analysis ..."

In fact, the MLA was denied fair and equitable treatment in the AA by the City and PB. As a direct and intended result, the MLA was unjustly eliminated — not for "good cause" but rather for political cause. We submit that this was a blatant violation of the spirit and intent of the regulations that govern the environmental process; we further submit that only by reinstating the MLA into the NOI2 and SIP2, can Honolulu ever aspire to reducing its traffic congestion. The following supports these claims.

Excessive MLA capital cost projection

The City and PB projected initial costs of $2.6 billion for the *two-lane* reversible elevated MLA in the AA. Here are some indicators of excessive projected costs:

- If PB's projected costs are correct, the MLA would cost seven times that of Tampa's comparable new ten-mile *three-lane* elevated reversible expressway.
- The MLA would cost 50 percent more than the H-3 freeway – even allowing for inflation.[9] At such a cost the MLA would replace H-3 as America's costliest highway, despite H-3 being twice the size, built over difficult terrain, and with extensive tunneling.
- Dr. Stone AICP, Planning Director of the Tampa-Hillsborough Expressway Authority, wrote in a detailed four page letter to the Honolulu Advertiser that, "It is completely dishonest to say the elevated HOT lane in your transit alternatives analysis is similar to our elevated reversible lanes. And, it is this dishonesty that results in your HOT lanes costing $2.6 billion instead of the less than $1 billion that a true copy of our project would cost."[10]
- The soft costs alone (consultants, management, administration, etc) for the MLA are projected at $549 million,[11] which is 30 percent more than the cost of the entire Tampa Expressway, even including the error by the geotechnical subcontractor that cost over $100 million. Had the contractor not erred the cost of the Tampa Project would have been $320 million.
- The lack of even a soupçon of diligence, leave alone *due* diligence, being applied by the Transit Advisory Task Force (Task Force) to verify the reasonableness of PB's projected cost.

To assist in evaluating the AA, the City Council appointed a seven-member TATF, six of them politically connected people who could be relied upon to support the City's agenda. The seventh member was Panos Prevedouros, Ph.D., Professor of Traffic Engineering at the University of

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9 H-3 cost was $1.3 billion at its opening in 1997. Inflation brings it up to $1.63 billion today.
10 Attached to covering email as StoneTampa.pdf.
11 Capital Costing Memorandum, App. A, Alternative 3.

Hawaii, whose views are based on his engineering training and experience, not politics. The TATF presented their final Report to the Council on December 14, 2006.

The Chairman had appointed two TATF members to a Technical Review Subcommittee to evaluate the reasonableness of the projected construction costs of both the MLA and the rail transit alternative. One had been a long time employee of the state DOT and the other was the recently retired Director of Honolulu's City Department of Transportation Services (DTS).

After the subcommittee's first report to the Task Force, we asked them who they had contacted in order to reconcile the Tampa Expressway cost of $320 million (exclusive of the design error) with PB's estimate of $2.6 billion for the MLA. They told us they had only talked to PB, but had been assured that the projected costs were accurate.

We found this response unacceptable. We urged them to contact the Tampa-Hillsborough Expressway Authority and, more particularly, the nation's 10th largest construction company, PCL Construction, Inc. PCL had built both the Tampa Expressway and the Hawaii Convention Center, maintains offices in both Tampa and Honolulu and is familiar with the costs and construction difficulties in both cities. One of the subcommittee members made a single phone call to Tampa; no one bothered to contact PCL.

The final subcommittee report shows the lack of due diligence warranted by a multi-billion dollar project and may reflect a breach of the fiduciary duty to investigate and verify the facts and take the necessary steps commensurate with the amounts involved.

For example, the sub-committee report justifies greater costs for the MLA, in part, by arguing,

> Because the elevated structure for the Managed Lane Alternative would be 36 feet wide for its two travel lanes, whereas the structure for the fixed guideway would be only 26 feet wide, different diameter piers are necessary for each (8 feet versus 6 feet in diameter).[12]

The sub-committee members totally ignored the fact that the Tampa Expressway is nearly 60 feet wide yet has only 6-foot wide piers. It gives one pause to think that this is the extent of construction knowledge of the sub-committee and the local office of PB.

After consulting with many industry professionals, we have projected a cost of $900 million for the MLA, including a 25 percent allowance for cost overruns. This is twice the cost of the Tampa Expressway, including the $100 million error, or three times without it.

At $900 million, the MLA would surely have been the Locally Preferred Alternative (LPA), and that is the reason, we submit, for the exaggerated capital cost estimates.

Another reason given for the rejection of the MLA appears to be that contained in the DTS response to my comments on SIP1,

> The Honolulu High-Capacity Transit Corridor Project analysis is meant to evaluate project alternatives that may be constructed within the authorization of Act 247, enacted by the Hawaii state legislature in 2005. The act prohibits the construction of a non-transit project with the authorized excise-tax surcharge.[13]

However, we note that with a good faith projection of costs, these Act 247 funds would not be needed since the MLA toll revenues would pay for half the project and the federal government the balance.

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[12] TATF Report, p. A-20

[13] Kaku letter to Slater, 6-20-2006.

Excessive operating cost

Since we lack sufficient detail about the operating costs for the MLA, what may well have driven up the cost are a) maintaining the 5,200 parking stalls (AA, p. 3-8) built into the project, and b) the cost of operating a bus station, and c) the number of buses allocated to the MLA.

The parking stalls are almost entirely unnecessary. We have failed to find any significant parking associated with an MLA elsewhere in the country.

The high bus operating cost for the MLA is mainly caused by an excessive number of buses projected for it. The following bus fleet data is taken from the AA, table 2-1, and the daily trips data from the AA, table 3-7. The percentages shown are calculated from these data.

Alternative	Bus Fleet	% change in buses from exist	From NB	from TSM	thous trips daily	% change in trips from exist	from NB	from TSM
Existing	525	0.0%	N/A	N/A	178.4	0.0%	N/A	N/A
NB	614	17.0%	0.0%	N/A	232.1	30.1%	0.0%	N/A
TSM	765	45.7%	24.6%	0.0%	243.1	36.3%	4.7%	0.0%
MLA	906	72.6%	47.6%	18.4%	244.4	37.0%	5.3%	0.5%
Rail-Halek	540	2.9%	-12.1%	-29.4%	294.1	64.9%	26.7%	21.0%

Note that the MLA is projected to have a bus fleet nearly 50 percent greater than the No-build alternative, yet gain only five percent more trips. This small increase is projected despite the MLA offering bus users the advantage of a congestion free ride from the Leeward end of the MLA to downtown.

The 906 buses projected are far too many buses for the projected MLA ridership. It should be anticipated that more riders per bus would be achieved by the MLA option in the Corridor since buses using the MLA would be operating at far higher speeds than either the No-Build or the TSM and thus able to make more trips per bus; buses can make the round trip by returning on the relatively uncongested regular freeway.

The MLA should project significantly more riders than the No-Build or TSM Alternatives since it will offer motorists, who may be potential bus riders, a significant time savings. Currently, buses (and autos) take 39 minutes to travel 13 miles at 20mph on the regular freeway. Using the MLA, buses would take 13 minutes to travel the 13 miles at 60 mph, a savings of up to 26 minutes versus automobile travel on the regular freeway.

Killing the MLA advantage

The AA version of the MLA allowing free passage to HOV2s significantly reduces the advantages of the MLA over rail transit by eliminating the zipper lane.

To add insult, PB said in a letter to us that "A two-lane reversible option for the Managed Lanes Alternative, matching what you have proposed, has been added to the range of alternatives being evaluated in the Alternatives Analysis."[14]

[14] Kaku to Slater letter of 6/20/2006.

What we actually proposed in our comments on the original Scoping was, "On the HOT lanes, buses and vanpools would have priority and travel free, other vehicles would pay a toll ..."[15] What resulted was a 16-mile facility, unnecessarily lengthened to presumably drive up costs, with HOVs allowed free.

First, allowing HOV-2s at no charge on the MLA means that the zipper lane will no longer be needed. Thus, by deleting the zipper lane, PB was able to reduce the two-lane gain to a single lane gain.

Second, allowing HOV autos on the MLA greatly increases the costs of policing as staff attempt to determine whether or not autos have the requisite number of automobile occupants. On the other hand, pre-registered buses and vanpools would be outfitted with transponders signifying their legitimacy and take little policing.

Third, this policy reduces the revenues available to fund the project, thus necessitating a tax increase.

PB showed the MLA option operating at LOS B to D in the morning peak hour. Since dynamically priced MLAs are operated to keep them congestion free, we do not understand why they should not be LOS B, or better, at all times.

FTA funding may be allowed for the MLA

FTA New Starts funds cannot presently be used for the MLA Alternative (AA, p. 6-10). However, the FTA has been revising its policies on funding tolled highways such as the recent one allowing funding for HOT lane conversions from existing HOV lanes. While FTA's policy still holds that managed lanes built *de novo* cannot be funded with New Starts funds, it places this policy in conflict with recent changes in FTA policy favoring tolled highways.

One might reasonably expect that an MLA that met certain conditions, such as giving buses and other high occupancy vehicles priority over automobiles, would, in time, be eligible for New Starts Funds and therefore should be studied further in the Environmental Impact Statement process.

PB has under-engineered the MLA

The rail transit alternative in the AA had five different alignment options that survived the process. The reversible MLA, on the other hand, had only one.

PB should have also examined five options for the MLA alternative. They should have considered the three-lane option as built by the Tampa Expressway since it offers a 50 percent greater lane capacity at only a 20 percent increase in cost. They should also have considered both two and three lane options in combination with more options for ingress/egress along the lines suggested by Dr. Prevedouros.[16]

Dr. Prevedouros examined the MLA's treatment in the AA from an engineering perspective and submitted his report[17] to the Transit Advisory Task Force. He finds PB's treatment of the MLA significantly lacking and concludes,

> "Based on substantial evidence of ML being under-engineered, its performance statistics of are not representative of what a new 2-lane reversible expressway can do for this corridor ... In short, the ML provides extensive regional traffic management possibilities, none of which were explored."

The TATF Report itself says, "... it may well be that operational variations of this alternative [MLA] could make it more attractive and/or feasible than the specific version considered." The

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15 Scoping Report, Appendix B. page 46 of 100.

16 A Design for a HOT Expressway and Other Traffic Relief Projects for Oahu.

17 TATF Report, pp A-8 to A-18.

Report then refers to its Appendix 3, "Suggestions for further development of the Managed Lane Alternative," written by the former Chief Counsel of the USDOT's Volpe Center, David Glater, acting as the Transportation Analyst for the TATF. Essentially, this report admits to the under-engineering in producing this list of suggested modifications.[18]

FTA must give weight to traffic congestion reduction

> "... in current evaluations of proposed New Starts projects, FTA considers directly only those user benefits derived directly from changes in transit service characteristics."[19]

At the Pearl Ridge screenline, the only freeway is H-1 and for the peak period inbound provides five regular lanes, a zipper lane and an HOV lane.

A properly defined MLA would provide an additional two lanes to the above. More importantly, it would be the equivalent of four new lanes since the MLA is a more efficient conveyer of vehicles. As shown in the U.S. Department of Transportation (USDOT) *Congestion Primer*,[20]

> Vehicle "throughput" on a freeway is the number of vehicles that get through over a short period such as an hour ... The number of vehicles that get through per hour can drop by as much as 50 percent when severe congestion sets in ... each variably priced lane in the median of State Route 91 in Orange County, California, carries twice as many vehicles per lane as the free lanes during the hour with heaviest traffic. Pricing has allowed twice as many vehicles to be served per lane at three to four times the speed on the free lanes.

Therefore the two lanes of the MLA would take the equivalent of four lanes of traffic off of five regular lanes of the H-1 freeway, providing significant traffic relief in the Corridor.

Dr. Prevedouros calculated "that in 2030 and with a properly designed 3-lane Managed Lane expressway, traffic congestion on the H-1 freeway will be almost the same as in 2003 while still using the AA's growth forecasts. Congestion on H-1 freeway will be incomparably worse with any of the Rail options."[21]

We do not understand why traffic congestion reduction is not being taken into account by FTA. In announcing a war on traffic congestion as the new policy, Secretary Mineta announced that,

> The Administration's objective must be to reduce congestion, not simply to slow its increase. Congestion is not an insurmountable problem ... The Federal Government's most important role is to establish mechanisms to ensure that the right investments get made ... We must end the era of complacency about congestion. The **National Strategy to Reduce Congestion on America's Transportation Network** provides the framework for government officials, the private sector, and most importantly, the citizen-user, to take the necessary steps to make today's congestion a thing of the past. (original emphasis)

Furthermore, SAFETEA-LU states that, "... the Secretary shall analyze, evaluate, and consider ... factors such as ... congestion relief."

Traffic congestion reduction is critically important to Oahu citizens and the bias shown by the AA against the MLA needs to be addressed.

Other matters to be studied

The City must examine the experiences of other cities to justify what it will propose as the result of the Environmental Impact Statement (EIS) process.

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18 TATF Report, pp. A-32 to A-33.
19 http://www.fta.dot.gov/documents/Discussion_1_CE_Allowances.doc
20 US DOT Congestion Primer
21 TATF Report, p. A-12.

The City must compare our present and projected future highway capacities relative to that of other U.S. cities in order for the public to judge whether of not we have shortage of highway mileage.

Population forecasts used by PB from state forecasts are clearly in error and should be reexamined. Resident population growth rate for Honolulu for the 25 year period, 1980-2005, was 0.69 percent annually. For the period 2000-2005, the actual growth rate was 0.67 percent and this at a time of a booming economy and no real unemployment. The state forecast for this period was 0.8 percent annually. The difference led to a population shortfall of 7,600 for the five-year period. Continued shortfalls of this magnitude will lead to a shortfall from the state's population estimates of around 45,000 by 2030.

The EIS for the Project must also include a risk assessment or what may happen if we have another downturn in the State's economy as happened during the 1990s. Few, if any, of the projections made for the 1992 Final EIS for the Honolulu Rapid Transit Project were accurate. Population, jobs, transit tax revenues and transit riders all failed dismally to reach the numbers projected by Parsons Brinckerhoff.

We have significant numbers of young people moving out of the state, in large part because of the high cost of housing. And the full impact of the recent run up in prices has yet to be recognized in the demographic data. A partial view of the situation may be gleaned from a recent article the Wall Street Journal (www.honolulutraffic.com/WSJhomeless.pdf), which details the devastating effect on Hawaii service workers.

The high cost of housing is the primary cause of our having a net outflow of local young families to the Mainland who are being replaced by immigrants, many of whom are virtually unemployable. The result is a grave shortage of service industry people. The economic impacts of this situation together with the heavy financial burden of a rail transit system must be examined in the EIS.

Summary:

The public needs to know why a second NOI and SIP was necessary; otherwise, Heaven forbid, we might think that someone is trying to slide one by us.

The City needs to level with the public and provide a 'need' statement which is in clear language, does not mislead, and is what the public believes it to be, "to reduce traffic congestion below current levels." And the 'purpose' of the Project should be to do just that. With that 'purpose and need' in mind, our elected officials and the public can get on with deciding on what the Project should really be.

Our foregoing comments on the MLA is the most important evidence demonstrating the bias exhibited against the MLA by the City and PB, its "client-focused" consultant.

A disinterested reviewer could only conclude that, at the hands of the City and PB, the MLA has not been accorded fair treatment and that the MLA should be reinstated into the Scoping process — preferably with the MLA study being performed by a different, more "taxpayer-focused," consultant.

As Secretary Mineta said recently in announcing the new *National Strategy to Reduce Congestion on America's Transportation Network*, "Congestion is not a fact of life. It is not a scientific mystery, nor is it an uncontrollable force. Congestion results from poor policy choices and a failure to separate solutions that are effective from those that are not."

Final word

Rail transit may have some benefits but the evidence is clear from the experiences of other cities that reducing traffic congestion is not one of them and the public deserves to be told.

Choosing rail transit over managed lanes would not merely be a "poor policy choice," but rather it would he the definition of a "failure to separate solutions that are effective from those that are not."

Appendix A

This video of, Mayor Hanneman and Rep. Neil Abercrombie's city hall "Traffic sucks!" rally held on December 5th, 2005, typifies the grossly misleading statements emanating from our elected officials. http://mfile.akamai.com/12891/wmv/vod.ibsys.com/2005/0707/4695365.200k.asx

"Judging by how much traffic has worsened in just in the past few years, that's probably a conservative prediction. The only way to prevent it is to act now to address the problem. Our quality of life is at stake. Rail transit is a key element in the solution." Congressman Neil Abercrombie. Honolulu Advertiser. April 17, 2005

"Hannemann said the yet-to-be-determined form of transit would run from Kapolei to downtown and the University of Hawai'i-Manoa. He said the system will help all parts of the island, easing traffic overall because 'there'll be less cars on the road.'"
http://the.honoluluadvertiser.com/article/2005/May/12/ln/ln02p.html

Mayor's Press Secretary: "Slater misrepresents just about everything Mayor Mufi Hannemann, Transportation Ser vices Director Ed Hirata and other supporters of transit have said, from the timing of federal requirements to tax calculations, highway capacity and a rail system's potential to ease traffic congestion." http://the.honoluluadvertiser.com/article/2005/Aug/10/op/508100321.html

Transcript of Councilmember Barbara Marshall questioning U.S. Rep. Neil Abercrombie (D-Hawaii) http://hawaiireporter.com/story.aspx?696a58e3-9a81-411e-b977-2688f5595685

"Mayor Mufi Hannemann chided Lingle at the rally and said the city needs a rail system to alleviate increasing traffic congestion. U.S. Rep. Neil Abercrombie, D-Hawaii, also blasted a possible veto and said that he and the rest of Hawaii have had enough of the traffic problems. He said commuters are fed up and don't need anymore "Lingle lanes" filled with traffic congestion."
http://www.bizjournals.com/pacific/stories/2005/07/04/daily18.html?t=printable

TRANSIT ADVISORY TASK FORCE

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December 14, 2006

TO: Romy Cachola, Chair, Council Committee on Transportation and Planning

CC: Donovan Dela Cruz, Council Chair
Transit Advisory Task Force members

FROM: Kazu Hayashida, Chair, Council Transit Advisory Task Force

SUBJECT: Transit Advisory Task Force Report

Following is the report of the Transit Advisory Task Force called for in Council Resolution 06-292, CD1, "Establishing A Transit Advisory Task Force To Assist The Council In Selecting The Locally Preferred Alternative For The City And County Of Honolulu."

The above-referenced Council resolution asked the Task Force to make findings and recommendations in three areas:

1. Whether each alternative in the AA is presented fairly and accurately.

2. Whether the AA's forecast of ridership, impacts, costs and financing for each alternative is reasonable, whether the data provided is comparable to historical data from operating systems in other jurisdictions, and whether the alternatives can be fairly compared on the basis of those forecasts.

3. Whether any additional information must be obtained to enable the Council to select a Locally Preferred Alternative, and if so, where and how such information can be expeditiously obtained.

The Task Force established several committees to review specific aspects of the Alternatives Analysis:

- Committee to review modeling methodologies and the ridership and travel time forecasts they produced.

- Committee to review construction cost estimates to ascertain whether they were reasonably compiled and prepared consistently for all alternatives involving construction.

- Committee to review financing of proposed alternatives involving construction.

These committees have prepared reports presenting their findings, which are included in Appendix 1.[1] In addition, the Task Force's transit analyst addressed other issues as requested by the Task Force Chair.

1. Whether each alternative in the AA is presented fairly and accurately.

The Alternatives Analysis ("AA") proposed four alternatives – No Build, Transportation System Management (improvements not involving capital expenditures), Managed Lane, and Fixed Guideway. We conclude that these alternatives were fully and fairly presented. The Task Force focused its review on the two alternatives involving construction (Managed Lane, Fixed Guideway).

Presentation of the Managed Lane Alternative (Alternative No. 3). The Managed Lane Alternative mirrors a proposal submitted to the City Department of Transportation Services (DTS) Administration by a member of the public approximately 1 year ago, in response to invitations to the public to come up with alternatives to a fixed guideway system. (The primary differences are that the DTS Managed Lane Alternative has added an off ramp at the stadium, and a station near Middle Street.) The Task Force finds that the Alternatives Analysis' presentation and assessment of this alternative were fair and accurate, however, it may well be that operational variations of this alternative could make it more attractive and/or feasible than the specific version considered. These variations are discussed under question no. 3 below (additional information).

Use of "rail" as a shorthand for the Fixed Guideway Alternative. The Fixed Guideway Alternative has been regularly referred to as the "rail" alternative. The Alternatives Analysis did not specify the transit technology (e.g., light rail, heavy rail, bus rapid transit, personal rapid transit) to be operated on Alternative No. 4's fixed guideway. Rather, it states that the choice of technology will be made at a later stage in the planning process.[2]

2. Whether the AA's forecast of ridership, impacts, costs and financing for each alternative is reasonable, whether the data provided is comparable to historical data from operating systems in other jurisdictions, and whether the alternatives can be fairly compared on the basis of those forecasts.

Ridership forecasts. Each of the members (2) of the Committee charged to review the Alternatives Analysis' ridership forecasts independently prepared a report presenting the results of his review. Professor Karl Kim, Ph.D., Professor and Chair, Urban & Regional Planning, University of Hawaii at Manoa, reviewed the planning methods, sources of data, and the internal workings of the computer model used to produce ridership estimates, and concluded that the model produced useful information that could reasonably be relied on for the planning purposes of the Alternatives Analysis. Professor Panos Prevedouros, Ph.D., Professor of Transportation Engineering, Department of Civil and Environmental Engineering, University of Hawaii at Manoa, reviewed the model's outputs, as presented in the Alternatives Analysis, and questioned

specific results that in his view call into question the model's predictions for these same planning purposes. Both Professors' reports are included in Appendix 1.

The Task Force's transit analyst checked with DOT/Federal Transit Administration ("FTA") staff in Washington to ascertain FTA's familiarity and "comfort level" with the ridership forecasting model being used here.[3] The Honolulu planning model does not suffer from deficiencies that FTA has identified in other transportation ridership forecasting models in current use.[4] Nevertheless, FTA will be reviewing the operation of the model and its outputs in detail over the next few months in anticipation of the City's application for entry into New Starts Preliminary Engineering. This review will include testing of the model to ascertain how well its outputs compare with the on-board survey results, as well as how well it reproduces observed travel and ridership patterns.

The Task Force cannot resolve the disagreements between these Task Force members/professors. Professor Kim concludes that the model reflects a sound, "best practices" approach that produces useful, consistent results that enable evaluation and comparison of alternatives. Although Professor Prevedouros is critical of specific results produced by the Honolulu planning model, he does not disagree with the use of computer models for transportation planning. We appreciate that FTA has no a priori dissatisfaction with the computer model being used for this project, and welcome FTA's thorough review and testing of this model and the results it produces. If any of the questions posed by Professor Prevedouros in fact raise substantive issues with the model, we would expect the FTA's review to flag them. We note that, with respect to the model's projections that are based on population trends, the population data used in the model are generated by the State, and must be accepted for transportation planning purposes. We conclude that the ridership and related forecasts presented in the Alternatives Analysis provide a reasonable basis for describing the impacts of each Alternative, and for comparing these Alternatives.

Construction Costs. The Task Force's committee charged with reviewing cost estimates for the two Alternatives involving construction (Managed Lane Alternative and Fixed Guideway Alternative) concluded that the capital costs for each were compiled using the same FTA-prescribed methodology and common unit cost prices. These unit prices (price per cubic yard of concrete, per ton of reinforcing steel, etc.) were obtained from recent large construction projects on Oahu (Waimalu section of the H-1 highway viaduct widening) and validated against U.S. Navy construction unit cost data. Both Alternatives are designed to AASHTO design standards. The committee also compared cost per square foot estimates for construction of the Alternatives' elevated (bridge) structures ($330 per square foot, and $390 per square foot for construction in urban areas) against the Hawaii State DOT's current planning cost estimate for elevated structures -- $400-$500 per square foot. The Task Force agrees with this committee that the Alternatives Analysis' construction cost estimates were fairly and consistently prepared, and that they may be used for both planning and cost comparisons.

Because of the attention focused on comparison of the Alternatives Analysis' estimates of construction costs versus actual costs to construct a partially elevated tollway in Tampa, Florida,

the Task Force requested the committee to assess whether the two projects are comparable. The committee concluded that the projects are sufficiently different (actual costs versus projected costs with contingencies; available, accessible ROW vs. construction in actively used highways; no utilities relocation vs. extensive relocations) as to make the comparison unreasonable.

This committee noted the significance of the proposed location of the Fixed Guideway Alternative's maintenance/vehicle storage facility at the Navy Drum Storage site (blue shaded area Makai of Farrington Highway in AA, figure 2-4 on p. 2 - 10). By treating the need to connect the fixed guideway to this particular site as mandatory, flexibility may be lost to extend the fixed guideway in the Koko Head direction, or to construct this Alternative in otherwise logical segments. The Task Force recommends that a renewed effort to find an alternative site for the maintenance/vehicle storage facility that is closer to downtown, so that the planning for this Alternative is not unnecessarily constrained.

Financing. This committee reviewed the methodology developed to calculate GET ½% tax surcharge revenues and concluded that it produced a reasonable range of tax revenue estimates. The possibility that taxpayers will "game" the tax scheme (by reallocating taxable income to other islands) is real, and the Task Force recommends that the Council develop a plan for addressing it.

Federal funding request. The Federal New Starts funding being budgeted for in the Alternatives Analysis ($930-950 million) exceeds the amount FTA gives to most projects ($750 million). We note, however, that the amount being sought is 20-25% of total costs, depending on the funding obtained from the GET ½% surcharge. This percentage is a smaller share of total project cost than FTA usually provides, and has been cited by FTA as justification for a Federal contribution exceeding the usual amount. In view of FTA's informal advice to ask for what is really needed, we conclude that it is reasonable to use the AA's proposed Federal contribution for planning purposes.

3. Whether any additional information must be obtained to enable the Council to select a Locally Preferred Alternative, and if so, where and how such information can be expeditiously obtained.

The Task Force did not identify any additional information that the Council must obtain before proceeding. However, as observed above, the Alternatives Analysis should have presented variations on the Managed Lane Alternative that could make this alternative more attractive. Appendix 3 contains suggestions for fleshing out possible variants of the Managed Lane Alternative.

A witness at the City Council's hearing held December 7, 2006, testified to limitations on electric generating capabilities on Oahu that could adversely affect operation of electric-powered vehicles on a fixed guideway transit system. When this concern was raised with DTS Administration, the response was that Hawaiian Electric Co. has assured that it can meet a fixed guideway transit system's power requirements. The Task Force recommends that this issue be

explored in more detail, perhaps within the NEPA process.

Environmental Review Status. Council members have questioned why the Alternatives Analysis Report was not accompanied by a Draft Environmental Impact Statement (DEIS) presenting information as to the environmental consequences of the alternatives described in the Report. Early on in the preparation of the Alternatives Analysis, it was the Department of Transportation Services (DTS) Administration's intention to prepare the Alternatives Analysis and a draft Environmental Impact Statement at the same time.[5] The Task Force and the Council have recently been informed that the DTS Administration now plans to conduct the Federal environmental review (NEPA) process after the selection of the Locally Preferred Alternative.[6] This process will begin with "scoping," which involves the identification of alternatives to be studied in the environmental review. This procedure for meeting NEPA requirements is permitted by FTA guidance,[7] however, FTA requires completion of the scoping process prior to a project's entry into Preliminary Engineering.

By proceeding in this order, the DTS Administration expects that scoping's identification of alternatives will be limited to those that are responsive to specific environmental issues posed by the selected Locally Preferred Alternative. The scoping process could elicit proposals that are alternatives to the LPA itself, however, including an alternative that was considered and rejected when the LPA was chosen. In this event, if the Federal Transit Administration is not persuaded that elimination of that alternative was reasonable, it may be necessary to include that alternative in the environmental review process.

Finalization of OMPO's regional transportation plan. The Oahu Metropolitan Planning Organization's (OMPO) projection of worsening traffic congestion provides the formal impetus for the preparation of the Alternatives Analysis. Its predictions appear in OMPO's draft regional transportation plan. The Council should assure that the final version of OMPO's regional transportation plan is substantively unchanged from the draft version being relied upon.[8]

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[1] Each committee presented a summary of its draft report to the Task Force, and responded to questions from Task Force members. The public also had opportunity to comment on these presentations. However, due to the limited time available, the members of each committee may not have had opportunity to evaluate in depth the reports prepared by the other committees.

[2] "The system could use any of a range of fixed-guideway transit technologies that meet performance requirements and could be either automated or employ drivers." AA, p. 2 - 7.

Vehicle performance assumptions: vehicle loading – one standee per 2.7 sq. ft. of floor space; multi-car trains (two vehicles per train), each train is 175-200 ft long and capable of carrying 300 passengers). AA, p. 2 - 15.

"A broad range of technologies was considered for application to this alternative [Alternative 4: Fixed Guideway], including light rail transit, personal rapid transit, automated people mover, monorail, magnetic levitation (maglev), commuter rail, and emerging technologies that are still in the development stage. Through a

screening process, seven transit technologies were selected and will be considered as possible options. Those seven potential technologies include: conventional bus, guided bus, light rail, people mover, monorail, maglev and rapid rail. Technologies that were not carried forward from a screening process include personal rapid transit, commuter rail, and the emerging technologies. The technology screening process and results are documented in the *Honolulu High-Capacity Transit Corridor Project Technology Options Memo*."
Alternatives Analysis Detailed Definition of Alternatives, p. 6 - 1 (Nov. 1, 2006).

[3] The transit analyst spoke with an FTA staff member who was indeed familiar with the Oahu transportation planning model -- he oversaw its initial development in the mid-'90's while working as a contractor employee prior to joining FTA.

[4] The FTA staff member referred to a technical discussion of these computer model deficiencies at a recent (June 2006) FTA-sponsored workshop that reviewed current issues in transportation planning methodology. Materials from this workshop appear at the FTA website. Attached is a discussion paper resulting from this workshop that reviews the history of New Starts transit ridership projections produced by computer planning models. See Appendix 2.

[5] "Scoping Report: Honolulu High-Capacity Transit Corridor Project," at p. 3 -1 (April 6, 2006).

[6] In the course of the Task Force's discussion of a draft of this report, a Task Force member indicated that the approach to accomplishing Federal NEPA environmental review that the DTS Administration now plans is similar to the State's environmental review procedure under Ch. 343, which encourages environmental review after an agency's proposed action has been defined. Section 343-5(f) of this chapter encourages cooperation among Federal and State agencies when both a State EIS and a NEPA EIS are required for the same project, including preparation of a single EIS document that meets both State and Federal requirements.

[7] In a letter to Councilmember Cachola, Chair, Transportation and Planning Committee, dated November 22, 2006 (#D-0958), DTS Director Kaku stated --

> "... the Administration was poised to prepare the AA and DEIS as a single document (AA/DEIS). An AA/DEIS follows FDA's traditional approach for preparing the programmatic environmental analyses and documentation. Beginning in 1993, FTA began to allow for the completion of an AA prior to the preparation of a DEIS as another option. Therefore, in accordance with Council Resolution 05 -- 377, CD1, the Administration has been following the latter option approved by FTA, whereby the AA required by 49 U.S.C. Section 5309(d) is conducted as a planning study prior to the National Environmental Policy Act review.
>
> "An EIS document is now scheduled to be prepared concurrent with the progress of preliminary engineering efforts once the LPA has been determined."

Guidance recently issued by the FTA discussing the relationship between the Alternatives Analysis and the NEPA environmental review process authorizes compliance with the environmental review process after completion of an Alternatives Analysis. From this guidance, summarized below, it appears that the entire environmental process may be conducted after the Alternatives Analysis, including the scoping phase. (Scoping is required by the NEPA process to identify the range of alternatives to be addressed in the DEIS.) However, with respect to scoping, "FTA requires projects to have progressed beyond the NEPA scoping phase before it will approve entry into New Starts preliminary engineering." The DEIS may then be prepared as part of preliminary engineering. "FTA recognizes that when the Draft EIS is being prepared as part of the New Starts PE [Preliminary Engineering] process, the scoping process can take 3 to 4 months to complete. Project sponsors should build this step into the schedule, recognizing that scoping can occur while FTA is reviewing the ridership, cost, and financial information that support the request to enter into New Starts PE." Federal Transit Administration, "Guidance on New Starts Policies and Procedures," p. 5 (May 16, 2006).)

DTS Chief Planner Toru Hamayasu has confirmed that it is now the DTS Administration's plan to prepare a DEIS after the Locally Preferred Alternative is selected, and that a new scoping process will first be conducted to support that DEIS effort. The DEIS will then be prepared (for submission to and eventual issuance by FTA) based on the result of that scoping report.

FTA's guidance states:

> "Performing the New Starts planning Alternatives Analysis prior to the environmental review process (so-called "Option 1") is most effective when the study area has complex transportation issues and a myriad of potential solutions, including alternative transportation modes, transit technologies, and alignments, and combinations thereof. In this case, a planning study to focus the issues is appropriate before initiating the environmental review process."

This guidance goes on to state that,

> "...for the results of a planning study (including a New Starts planning Alternatives Analysis) to be carried forward into the environmental review process, those results must be subjected to public and interagency review and comment during the scoping of the EIS, among other requirements."

Federal Transit Administration, "Notice of Availability of Guidance on Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU)," response to Question 13, 71 Fed. Reg. 66576 (November 15, 2006).

[8] In a planning context, the Alternatives Analysis represents a governmental response to the O'ahu Metropolitan Planning Organization's (OMPO) projection of worsening traffic congestion in the Kapolei – University of Hawaii-Manoa corridor. Alternatives Analysis, pp. S-1 – S-2. These projections are presented in OMPO's draft "O'ahu Regional Transportation Plan (ORTP) 2030." This draft was approved by OMPO's Policy Committee on April 4, 2006, however, it has not been finalized or officially released. A notice has recently been placed on the OMPO web site stating: "The Oahu Regional Transportation Plan is being finalized; a final document is expected by the end of 2006."

APPENDICES

TRANSIT ADVISORY TASK FORCE

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List of Appendices

Appendix 1 -- Committee Reports
- Ridership & Modeling Committee (two reports)
- Construction Costs Committee report
- Financing Committee report

Appendix 2 -- FTA Discussion Paper #6, "Predicted and Actual Ridership of Proposed New Starts Projects," Federal Transit Administration (June 6, 2006). Also available at: http://www.fta.dot.gov/planning/newstarts/planning_environment_5402.html

Appendix 3 -- Suggestions for further development of the Managed Lane Alternative.

Appendix 4 -- Questions the Task Force posed to DTS Administration, and the answers received.

Review of Alternatives Analysis
Ridership Forecasts

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Overview

Documents related to ridership estimates were reviewed, including the *Honolulu High-Capacity Transit Corridor Alternatives Analysis Report*, the draft Transit Forecasting Methodology Report, and *Travel Forecasting Model Development Project* of the Oahu Metropolitan Planning Organization, Final Documentation. A number of source documents such as the 2005 On-Board Bus Survey and other materials from the consultant were also reviewed. In addition telephone interviews were conducted with Mr. Toru Hamayasu (DTS), Mr. Gordon Lum (OMPO), and Mr. Mark Schiebe (PBQD).

The review was focused on three interrelated questions: 1) are the models and methods used sound? 2) do they produce useful information? and, 3) are the results accurate, reliable, valid? The review concludes with some summary comments.

Background

The Alternatives Analysis provides estimates for 2005 and 2030 for existing conditions, no-build,TSM, Managed Lane, and a number of Fixed Guideway alternatives. The ridership estimates are based on the OMPO regional travel demand model which was updated to estimate the effects of both existing conditions and the various alternatives. OMPO uses a "best practice" modeling approach whereby the components of the traditional four-step (trip generation, trip distribution, mode choice, network assignment) estimation procedure have tested and validated in other jurisdictions and then used in Honolulu. While there have been some new approaches to demand forecasting proposed in the literature, the emphasis with OMPO is to use industry-standard and FTA approved methods and approaches along with updated information. The number of trip assignment zones has been increased from 284 to 762. A new on-board bus survey was completed in 2005 which was used to validate the results of the ridership estimates. Some other enhancements to the OMPO model include the use of 11 different resident trip purpose (including 6 work-related trips) and a two stage trip distribution process to link trip productions to attractions and produce trip tables. The trip distribution procedure uses a Fratar, iterative fitting technique for balancing rows to equal productions and columns to equal attractions. The mode choice model utilizes a nested structure in which auto,

transit, and non-motorized travel (walk/bike) are considered; as are options such as single vehicle occupant, 1- and 2- occupant auto, local and premium bus services as well as kiss-n-ride and park-n-ride facilities. In addition to the estimation of ridership, travel times by mode and class and type of service are also provided. The FTA SUMMIT package also generates zone-to-zone estimates of ridership and travel benefits and impacts.

Soundness of Methods

After reviewing the various documents and speaking to many of the principals involved, I am convinced that the general approach – that is, using a version of the traditional four-step process, using the same model that was developed for the metropolitan planning organization (OMPO), and following FTA's guidelines and recommended procedures is not only sound, it provides opportunity to take advantage of work done over the years for Oahu as well as to incorporate ideas and knowledge from other jurisdictions. The "best practice" approach may not necessarily lead to the most innovative, or advanced or latest theoretical developments in ridership forecasting, but it does enable the City to build on widely accepted, tested, and used approaches to ridership forecasting. The other advantage is that it enables a degree of peer-review to occur, not just because the OMPO models have been developed and tested and reviewed and vetted over a 10 year period, but also because FTA has reviewed and accepted both the model form and the use of various parameters and functions used in the modeling process.

There has been discussion as to whether or not the traditional four-step, "comprehensive" approach should have been used. It is the industry standard. It is what is currently taught as the approach to take in urban transportation planning courses. The advantage is that the pieces of the model can be disentangled – from the land use and population projections, to auto ownership, to the generation of trip (work, school, recreational, etc.), to the distribution of trips in terms of origins and destinations and in terms of production and attraction zones, to the modal split (between transit and private automobile) including various nested combinations (park-n-ride, kiss-n-ride, bus-to-rail, etc.), as well as non-motorized modes (walk and bike). While the approach is complicated and multi-faceted, the value of it is that it lets us review, systematically, the various assumptions, data, forecasts, and inputs into the model and it allows us to understand both the overall ridership estimates as well as the regional, neighborhood, and eventually station location effects. While there have been some general criticisms of the large-scale comprehensive modeling it is, fundamentally, a sound approach to ridership estimation.

There have been some notable improvements made to the forecasting procedures used in Honolulu. The number of transportation analysis zones (TAZs) has been greatly increased. The kinds of different trip purposes has also been augmented. There have been continued developments in the trip distribution procedures. The model uses a Fratar approach which provides a form of internal consistency

and validation, as the trip tables must balance. It is the recommended approach for the trip distribution component of the model. It should also be noted that there have been improvements in the mode choice part of the estimation procedure. A nested logit multinomial model is generally acknowledged as the preferred approach. While we are somewhat constrained by the choice of nests and the particular ordering, it does provide a superior approach to considering different travel modes in a more sequential fashion than a more "flattened" polynomial mode choice.

While one could nit-pick or quibble over the functional forms, model coefficients, and utilities contained in the model, from my perspective, the general approach taken is sound. While there are always opportunities to improve travel demand forecasting, it is also critical that reviewers understand and accept the fundamental differences between an approach which uses industry standard best practices for estimating overall travel demand by alternative versus a more limited partial picture of one or more aspects of transit ridership.

Does the Travel Demand Model Provide Useful Information?

While one can also ask for more detailed information about a particular travel mode or class of service, or the impacts on an individual neighborhood, the advantage of the large scale modeling approach is that it enables us to review system-wide effects and to compare the choices of no-build, TSM, managed lanes, and fixed rail alternatives. The disadvantage of this approach, however, is the problem of information overload or sorting out the most useful and important elements for evaluation and decision-making. It should be noted, however, that the Alternative Analysis provides useful information on: 1) the total number of transit trips for each of the different alternatives including fixed rail estimates; 2) the estimated fixed rail boardings for proposed stations; 3) total VMT (vehicle miles traveled), VHT (vehicle hours traveled), and hours of delay for each of the alternatives; and 4) peak hour volumes and LOS (level of service) estimates for screenlines by alternative.

These systemwide measures are useful in a number of ways. They provide an estimate of automobile use versus other modes of travel. The VMT and VHT measures show auto use both in terms of miles and in terms of hours spent on the road. The vehicle hours of delay is a measure of congestion as are the estimates of LOS. There are two kinds of information provided in the Alternatives Analysis report: 1) information about future travel patterns and demand; and 2) information which allows for the comparison of alternatives.

Looking into the future is a difficult, challenging activity. Such is the business of planning. Part of the difficulty arises from the diversity of factors that can affect the forecasts of population, employment, and other activities of travel demand. The model predicts growth in travel demand and in transit trips even under the "no-builld" assumption. The Alternatives Analysis compares the increase in transit trips over the number of transit trips forecast under the "no-build"

alternative. While different alignments and configurations for the fixed guideway alternative are presented, it is also important to note the Alternatives Analysis enables comparison amongst the alternatives. This is the essence of an alternatives analysis.

Were the alternatives correctly specified? The framework of comparison – existing conditions, "no-build," TSM (Transportation Systems Management), Managed Lane, and Fixed Guideway (four different alignments) is appropriate and reasonable. It should be noted that the bus fleet size used in the analysis grows from 525 (existing) to 614 (no-build) to 765 (TSM) to 846/906 (two direction/reversible managed lane) options. The bus fleet is held closer to existing levels under the guideway alternatives.

It is also important to note that under the Managed Lane alternatives, various estimates of the effects of tolls were determined. Using a modeling approach developed for Houston and constraining the LOS to "C" (1,400 vehicles per hour) or "D" service (1,760 vehicles per hour) which would require a toll of $6.40 on all single and double occupant vehicles (all 3+ occupant vehicles would be free), the effects of tolls were also considered. It is important to note that this alternative is also studied in the OMPO model.

Accuracy, Reliability, and Validity

With travel demand estimation, the accuracy (or correctness) of the results can only ultimately be demonstrated after the system has been built and data collected in 2030. The issue of reliability refers to the reproducibility of the results. In part, this has been addressed in that the OMPO model was run in 2002 (albeit for different alternatives) and then re-run more recently for the High Capacity Transit Corridor Project. An initial inspection of the results indicates that there is a degree of consistency and reliability in terms of the model results. Certainly more information on the reliability of the estimates will become available as parts of the model are re-run as the project advances. Also, because the model is reviewed not just by OMPO and by the FTA, there are opportunities to investigate the reproducibility of the various estimates.

One of the advantages of using the large-scale travel demand forecasting procedure is that there are different ways of validating the results. More extensive documentation of the validation of the OMPO model is available. The validation consists of comparing the estimated to observed travel times for different classes or types of travel for a base year. Typically, an on-board bus survey is done to get ridership and travel time estimates as well data on origins and destinations. These data are compared to modeled or estimated results. A regression model comparing estimated to observed values is calculated, with the R-squared value used as measure of the explanatory or predictive power of the model. While there is need for more documentation of the validation effort for the High Capacity Corridor project, if the estimated travel times and boardings

are within a reasonable range of the observed 2005 on-board survey results, then the confidence in the estimates will be increased.

More effort could go towards the documentation of the modeling procedure. At issue are concerns regarding the aggregation of effects – from the 762 zones to the corridor and the other reporting districts contained in the Alternatives Analysis. There was not sufficient time to do a full audit of the model, nor was there adequate opportunity to examine how the different components from resident based trips to visitor trips and other details were integrated. It is assumed that because these are elements common to the OMPO model and because FTA reviews these details, these aspects of the model can be verified and documented at some later point.

Summary Comments

The methods used in the ridership estimates appear to be sound. The basic structure and approach to ridership modeling, meet industry standards consistent with the "best practice" approach employed by OMPO. It is also somewhat reassuring that the same model which is used by OMPO is also used in the Honolulu High Capacity Transit Corridor Project. The use of the traditional four-step demand estimation procedure with a Fratar trip distribution procedure and a nested logit model is comparable to what is done in other jurisdictions. While there is need for more evaluation of some of the input data – that is information regarding the population estimates, employment growth, and patterns of development to 2030, and while there are always opportunities to improve the specific sub-model components regarding auto ownership, mode choice, induced travel demand, visitor and other special purpose trips, as well as estimates regarding travel preferences as well as the willingness to pay for different types of transportation services, the general approach and set of procedures utilized in estimating ridership are sound.

The Alternatives Analysis provides useful information regarding travel demand, transit use (both presently and into the future), and a basis for comparison of alternatives in terms of key indicators related to transportation such as VMT, VHT, hours of delay, and LOS associated with the baseline, no-build, TSM, managed lane, and fixed guideway alternatives. While additional information could have been provided in terms of other benefits associated with increased choice of travel modes, increased reliability of travel from one point to another, and the differential impact of increased mobility and accessibility for various groups, allowing for more closer inspection of transportation equity and environmental justice requirements of each of the alternatives, these are concerns that might also be addressed in the environmental impact assessment procedure.

The Alternatives Analysis is a fairly digestable document. Unlike others which take hundreds of pages of text, this one seems fairly concise and focused on key issues, concerns, and impacts. As such it provides an adequate base of

information on which to make a policy decision as to whether or not to proceed to the next stage of planning and preliminary engineering

A final comment is that the travel demand estimation procedures and the ridership estimates appear to be somewhat conservative. First, it is important to note that the "best practice" approach employed in this study will yield more reliable results since the techniques are used and tested and evaluated in many other jurisdictions. Second, because the model is reviewed by the FTA, the parameters, utilities, and estimates are constrained by federal guidelines. Third, modest assumptions regarding the cost of gasoline or automobile travel are utilized. They are predicted to grow no faster than the general rate of inflation. Fourth, assumptions regarding future development around stations and the increased ridership associated with transit oriented development or transit adjacent development were quite modest. For purposes of comparison across the various alternatives, the same pattern of land use and population growth and development was used. There has been much research to the contrary, that a fixed guideway system will in fact result in increased densities, resulting in lower automobile use and greater transit ridership. Finally, the utility functions used to specify the willingness to travel by various transportation modes are assumed to remain constant over the period. This is to suggest that people in 2030 will behave much as they do today. The willingness to take a fixed rail guideway system is ultimately based on the willingness of people today to use bus service. This is a conservative approach. The modest growth in transit ridership results from the improvements in transportation services vis-à-vis the various alternatives and alignment choices with constant preferences and utility functions.

While there is always room for improvement in the difficult task of travel demand forecasting, and while we must remain vigilant over the application of various forecasting techniques and the data used as inputs to the model, the ridership forecasts were done using sound methods, providing useful information that is reasonably accurate, reliable, and valid.

HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT:
ALTERNATIVES ANALYSIS (AA) REPORT - Report to Transit Task Force

Panos D. Prevedouros, Ph.D. - December 10, 2006
Member, Honolulu Transit Task Force, and Professor of Transportation Engineering,
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This paper reviews the Alternatives Analysis report from an engineering perspective. In general, its organization tracks the organization of the report.

→ Page S-2: "Motorists experience substantial traffic congestion..." The report relies heavily on anecdotal experience of traffic congestion. It would benefit from a quantitative presentation of congestion data for major origin-destination pairs. This would allow for comparison of Honolulu's congestion to other cities. Data from the State's Congestion Management System should be cited and tabulated.

→ Page 1-1: The statements of purpose

- "improved mobility"
- "provide faster, more reliable public transportation services"
- "provide an alternative to private automobile travel"

make it clear that this is a public transit analysis - not a more comprehensive analysis of transportation issues in the subject corridor . In particular, the effects of the alternatives on freight transportation in the corridor are not considered, even though the alternatives will plainly impact freight. This Alternatives Analysis does not respond directly to the need to reduce traffic congestion on Oahu.

→ Page 1-1: Bottom: "Current a.m. peak period times for motorists from West Oahu to Downtown average between 45 and 81 minutes. By 2030, after including all of the planned roadway improvements in the ORTP, this travel time is projected to increase to between 53 and 83 minutes."

From this description, travel time will be relatively stable for 25 years into the future (45 minutes to 53 minutes, 81 minutes to 83 minutes, on average, provided the ORTP roadway improvements are implemented.) I question whether this level of inconvenience is severe enough to justify a fixed guideway project of the magnitude proposed in the Alternatives Analysis, in addition to the cost of the base improvements called for in the ORTP.

→ Page 1-9: The UH-Manoa campus is not identified here as a major public transit destination, notwithstanding the data presented on page 1-4 (20,000 students, 6,000 staff; 60% of students must drive or use transit to attend classes). If it is not a major transit destination, why is rail service to the UHM being considered?

Page 1-13, Table 1-1: The vehicle speed projection data presented here are not consistent with engineering observations. Once a street segment becomes saturated with traffic, such as the "Liliha Street" segment on the H-1 freeway, the average speed of vehicles on that segment tends to stabilize at about 15 mph. Therefore, the estimated average speed drop from 19 to 12 mph on the Liliha segment is unlikely. Rather, increased traffic will be experienced as longer periods of

traffic congestion. The planning model does not seem to be able to model saturated traffic conditions correctly. This can affect speed estimates for congested roadways, and result in inaccurate travel time forecasts.

→ ♦ Page 2-3: Bus fleet size estimated for the Managed Lane alternative is overstated, and is not consistent with national experience. Buses run 10 miles in approximately 10 minutes on HOT lanes. As a result of improved bus efficiency, either fleet size is reduced, or a given fleet size can provide a much higher service frequency.

→ Page 2-16: It is not clear from the Operating and Maintenance cost estimates presented here whether replacement costs for the rolling stock and the multitude of deteriorating pieces of equipment (switches, generators, signals, computer controls, extensive wiring and power system, etc.) of the Rail option have been included in projections of annual O&M costs. Text at pages 3-9 and 3-10 do not answer this question.

→ Page 3-2: Table 3-1: Significant trip growth is projected in two out of 25 Traffic Analysis Areas on Oahu. Specifically:

Area 11 is Honouiliuli and Ewa Beach — 2005 total daily trips are 176,000
2030 total daily trips forecast at 342,000
This is an increase of 166,000 total daily trips.

Area 12 is Kapolei, Ko'Olina, Kalaeloa — 2005 total daily trips are 122,000
2030 total daily trips forecast at 362,000
This is an increase of 240,000 total daily trips.

Trip generation for these two areas will change from 298,000 trips in 2005 to 704,000 trips in 2030, a growth of 136% in 25 years. These estimates are questionable, given Oahu's population growth of 4.8% between 1990 and 2000, the annual growth in tourism of only 0.6% per annum since 1990, continued reduction in agriculture, stability in military operations and reduced travel as baby boomers retire and draw a pension instead of going to work.

For order-of-magnitude purposes, this 704,000 transit trip projection for areas 11 and 12 should be compared with the Table 3-3 estimates for transit trips under any of the four fixed guideway alternatives – 281,900 to 294,100 – for entire Oahu. If trips in areas 11 and 12 grow by only half as much, by 68% in 25 years, then their 352,000 projected new trips would be close to the projected total number of transit trips on Oahu.

→ Page 3-4: Data in Table 3-3 in combination with Table 3-7 also provide useful order-of-magnitude comparisons:

- Year 2030 Transit trips in the "No Build" alternative are projected at 232,100.
- Year 2030 Transit trips with the Rail alternative most favorable to transit are projected at 294,100.
- Total gain in transit trips after a rail system is constructed: 62,000 transit trips.
- Year 2030 Vehicle trips are estimated at about 3,000,000 (at a 1.6 average occupancy including buses, this estimate represents 4,800,000 person trips).
- The 62,000 new transit trips reflect about 1% of person trips.

Baseline transit trip projections have been historically overstated by about 21%, as the table below indicates. The table shows actual *TheBus* trips versus forecasted *TheBus* trips in the "No Build." In other words, the base ridership in the No Build is inflated. Once the base is inflated, all transit ridership forecasts are inflated and justifiably uncertain.

Millions of *TheBus* Transit Trips per Year

Year	Actual	Forecast	Source	Difference	% Error
1990	75.6				
1991	72.8				
1992	73.0				
1993	75.6				
1994	77.3				
1995	72.7				
1996	68.9				
1997	68.6				
1998	71.8				
1999	66.2				
2000	66.6				
2001	70.4	73.0	*HART*		
2002	73.5	67.0	*Hali 2000*		
2003	69.1	88.0	*Rail 1992*		
2004	61.3	104.0	*BRT 2001*		
2005	67.4	96.0	*Rail 2006*		
Average	**70.7**	**85.6**		**14.9**	**21.1%**

From Table 3-3 it can be observed that in 2030 the number of transit trips for the No Build Alternative is 232,100, and that the number of transit trips in the best rail option is 294,100. If the Rail's trip estimate is overstated by 21%, then 294,100 become 232,339; these are about equal to the transit trips in the No Build. Thus, all of the gain in transit trips due to a rail system may be attributable to the inflated baseline forecasts.

→ ♦ Pages 3-7, 3-8: The TSM alternative is estimated to have a requirement for 6,200 parking stalls at various park-and-ride facilities, the Managed Lane alternative has the same requirement, but the 20-mile rail option is projected to require only 5700 parking stalls. A smaller parking requirement for rail compared to TSM and ML does not make sense. In the Rail alternative many riders who cannot walk to a station must drive and therefore have to park their vehicles somewhere. In the TSM and ML alternatives, the transit vehicles – buses – collect riders from their residential neighborhoods and deliver them to their destination, thereby arguably reducing the quantity of parking stalls required. This discrepancy should be clarified.

→ Page 3-11: Table 3-11 includes travel time estimates for year 2030 with Rail. Basically travel by auto is equal, faster or much faster than rail for all 2030 trips between:

- Aiea (Pearlridge) and Downtown
- Downtown and Ala Moana Center
- Downtown and Manoa
- Airport and Waikiki

For trips between Aiea and either Waikiki or Manoa, all Rail alternatives will provide trip times that are the same as or longer than trips by auto. The travel times by auto reflect 2030 traffic congestion conditions without rail.

→Page 3-13: The following excerpts from the performance assessment of the Managed Lane Alternative indicate that the ML alternative did not receive minimal engineering analysis support needed to develop solutions to obvious issues:

> "While bus speeds on the managed lanes are projected to be relatively high, the H-1 freeway leading up to the managed lanes is projected to become more congested when compared with the other alternatives, because cars accessing the managed lanes would increase traffic volumes in those areas."

Instead of providing new ramps from the H-1 and H-2 freeways and a ramp from Farrington Hwy. to feed the Managed Lane facility, an already congested freeway itself was used to feed the ML. The predictable result is both more congestion on H-1 freeway and underutilization of the ML.

> "Additionally, significant congestion is anticipated to occur where the managed lanes connect to Nimitz Highway at Pacific Street near Downtown."

This occurred because a (poor) choice was made to simply use the state's proposed Nimitz Viaduct (NV) project. However, NV was conceived as a shortcut between the Keehi Interchange and downtown and was never intended to serve new traffic from the Ewa plains to town. It can still be used, but it needs to be re-engineered to provide adequate off ramps to major trip destinations. The AA's ML is under-engineered in terms of off and on ramps by a magnitude of at least three (3). Three times as many ramps are needed and can be engineered. If this is done, the quote below will have no place in the AA.

> "Hence, much of the time saved on the managed lane itself would be negated by the time spent in congestion leading up to the managed lane as well as exiting the lanes at their Downtown terminus."

Based on substantial evidence of ML being under-engineered, its performance statistics of are not representative of what a new 2-lane reversible expressway can do for this corridor.

In addition, the critical function of the ML as an escape/evacuation resource (or special event, high demand reliever) was not analyzed. The ML can be designed with Aloha Stadium and H-3 freeway as its middle anchor. In off-peak times, weekends, special events and evacuations, the ML can run from Waikele to Aloha Stadium and H-3 freeway on its west half, and from Iwilei to Aloha Stadium and H-3 freeway on its east half. Also, if Windward Oahu evacuation or high demand should occur, then the ML can be dynamically configured so that the H-3 freeway discharges both toward Ewa and toward Honolulu. In short, the ML provides extensive regional traffic management possibilities, none of which were explored.

→ ♦ Page 3-20: Table 3-10 presents projections of "vehicle hours traveled," a concept that has no application to trips using transit. This table should be reformulated to show "person *hours* of

travel," to make the comparisons consistent and relevant. Based on my calculations (see Appendix 1), when these data are so converted, then the hours spent traveling on Oahu with a 20-mile Rail line will be 11% longer than the No Build. All Rail alternatives will provide worse Oahu-wide person hours of travel compared to the car and bus No Build alternative. This is consistent with past experience in the U.S. where new rail systems have not reduced traffic congestion.

→ ♦ Page 3-25. The traffic estimates for the Managed Lane alternative presented in Tables 3-12 and 3-13 appear to be based on the assumption that a freeway lane may not carry more than 1,400 vehicles per hour in order for it to operate at a good level of service. This is simply not U.S. national experience for priced lanes. For example, Appendix 2 provides a multi-week, year 2006 sample of a three-lane cross-section of California's SR-91 Managed Lanes. They operate at free flow (about 60 miles per hour) while carrying a volume of more than 2,000 vehicles per hour per lane. There is no reason why this result would not apply to a two-lane Managed Lane facility on Oahu. Based on multiple research projects I have conducted for the State of Hawaii DOT, there are several 15-minute periods during which lanes on the H-1 freeway carry over 2,400 vehicles per hour (hourly equivalent), which attests to the ability of local motorists to drive at headways necessary to result to lane capacities in excess of 2,000 vehicles per hour.

The tables in Appendix 3 provide a sample of traffic analysis, the conclusion of which is that in 2030 and with a properly designed 3-lane Managed Lane expressway, traffic congestion on the H-1 freeway will be almost the same as in 2003 while still using the AA's growth forecasts. Congestion on H-1 freeway will be incomparably worse with any of the Rail options.

→ Page 3-27: "The travel demand forecasting model has been reviewed and updated for use on the project." Following are several common-sense observations on the forecasting model:

- Oahu has no rail service, so the existing OMPO model (done with survey data which are over one decade old) naturally has no local parameters for any type of rail service. What parameters were introduced to the model to represent rail?
- Is the model representative of today's conditions? Since the OMPO model was developed, *TheBus'* share of total trips has declined in the last 10+ years, fuel costs went up in the last 10+ years, Kapolei employment was non-existent 10+ years ago, the "bust" real estate market of the early 1990s is "booming" now, the H-3 freeway did not exist 10+ years ago, safety and security issues in metro rail systems (Tokyo, London, Madrid) did not exist, and last but not least, a huge portion of Oahu's population, the baby boomers, were not on the verge of retirement. Given these circumstances, it is at least questionable whether any model based on historical data can provide useful predictions over the Alternatives Analysis' planning horizon, 2005-2030.

All these trends affect the setting of parameters and alternative-specific constants in the model. Given all these concerns, how can a fundamentally old mode choice model with "imported" parameters give any reasonable predictions for year 2030? The model should be provided for review and its parameters should be justified.

→ Page 3-28: "External factors, such as a downturn in the economy, could affect whether the island will develop as planned." The AA's forecast is truly a best case scenario which is an unrealistic basis for multibillion dollar civil infrastructure development. Below is a partial list of

possible events that would make vigorous growth unlikely. For these reasons as well as the problematic construction and operation deployment of all Rail alternatives it is essential that Risk Assessment Analysis is part of this AA (see last point in this review.)

- practically zero growth in tourism
- a sustained energy crisis will cause high airfares and a reduction in tourist arrivals
- the possibility that avian flu, SARS or similar will further threaten tourism
- the Waikiki tourism plant is old, crowded and revitalization is slow
- continued reduction in agriculture
- stability in military operations and post-Iraq military downsizing to repay the war debt
- baby boomers retiring in large numbers
- substantial loss of seniority in Hawaii's Congressional Delegation will cause a dramatic decrease in earmarked projects and funds for Hawaii

Any of these reasons can cause a substantial reduction in development or expansion which makes rail an alternative that is inferior even to the simple TSM alternative.

→ Page 3-30, Table 3-14: In this summary table, the use of percentages to indicate the magnitude of the Rail alternative's impacts exaggerate the actual effects, because the actual numbers involved are quite small (as the comments above have shown).

→ Page 4-1: The Rail alternative has the highest environmental impact and displacements. Also rail is not environmentally benign once it is built and put to use. The energy units (BTUs) to transport one person one mile from the Transportation Energy Data Book: Edition 25-2006 are:

Car	3,549 BTU
Personal Truck	4,008
Transit Bus	4,160
Rail Transit	3,228

Commuting in America III reports that 70% of rail trips in the nation occur in the New York City metro area where subways run full or near-full for extended periods. In all cities with well utilized rail systems, these systems are busy for about four out of 24 hours per day. Unlike cars and personal trucks that spend energy only when they operate, most rail systems run continuously and draw large amounts of energy for serving few riders. Oahu's rail energy consumption will be at least twice as high as the BTUs reported above. Rail is an inferior environmentally and energy dependency alternative for Oahu.

Two critical omissions of the Alternatives Analysis report are information on the cost of the alternatives per resident and taxpayer and the absence of any risk analysis. The latter, for example, is found in any multimillion dollar project involving private funds.

1. Some argue that financial impact analysis should have been done prior to approving the raise of the General Excise Tax from 4.00% to 4.50%. However, at that time the alleged costs were in the order of about two billion dollars with a quarter of that coming from the FTA, leaving the local tax subsidy at $1.5 billion. The AA makes it clear that for the short, 20 mile rail system, the local contribution will be at least $3 billion. A breakdown of this cost per taxpayer and per capita is essential.

2. At a minimum, risk analysis should examine the implications of a partially finished product due to a severe economic downturn or other significant impediments. Travel demand and existing congestion levels dictate that the first useful segment of a future transit system should connect the airport with the Ala Moana Shopping Center. Managed Lanes can serve this (highest demand and congestion) segment because a large part of it is the state DOT's "Nimitz Viaduct" project which has received environmental approvals. However, one cannot operate a rail system without at least one expansive rail yard. The nearest appropriate space for a rail yard identified in the AA is next to the Leeward Community College. Therefore, with any rail alternative, the lowest demand segment must be constructed first, and if conditions do not allow for it, there is the risk of developing an ineffective piece of transit infrastructure connecting LCC to Aloha Stadium.

Appendix 1. Sample Estimations in Person-Hours of Travel

The travel estimates in Table 3-10 tell a different story than the one presented. Conveniently for the rail alternatives, the AA presents "vehicle hours traveled." By using this measure, those who travel on rail conveniently disappear from the travel time calculations as if they travel at warp speed. Far from it.

Let me take the "No Build" and "20-mile Rail" estimates of the AA to demonstrate the amount of time spent for transportation with and without rail using a statistic that truly matters: Person-hours.

The No Build vehicle hours estimate is 395,000 and assuming an average vehicle occupancy of 1.6 people per vehicle (includes buses), then the 2030 estimate is:

No Build Person Hours = 395,000/1.6 = *246,875* (1)

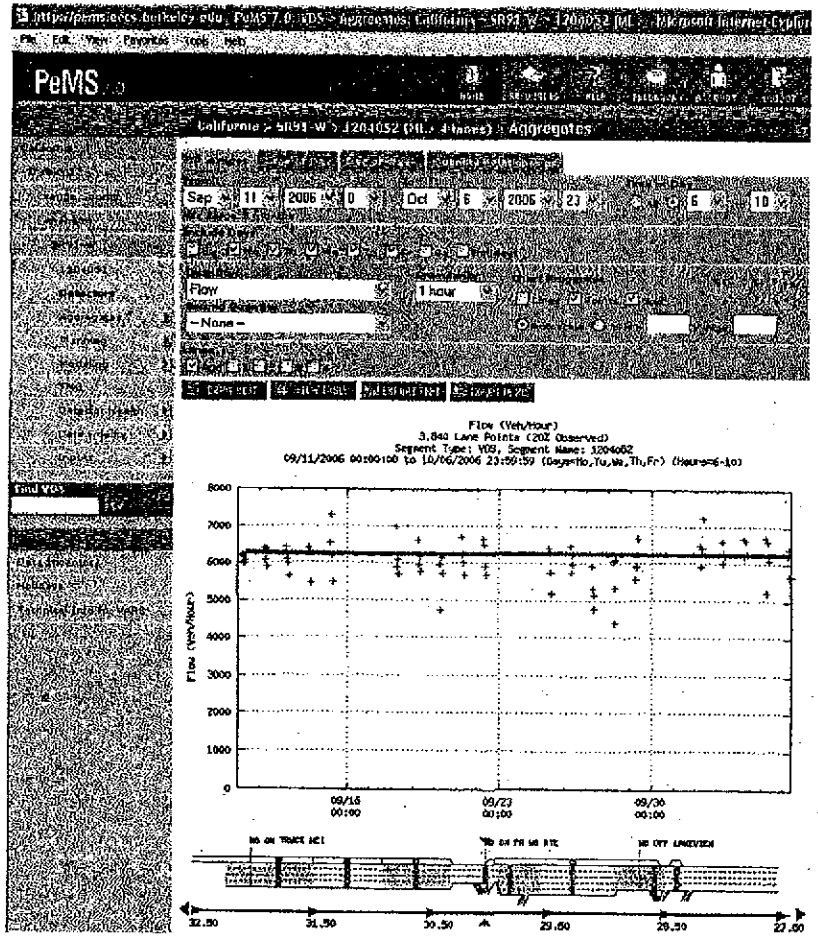
The 20-mile Rail vehicle hours estimate is 376,000 with the same average vehicle occupancy as the No Build. In addition, the 94,970 passengers in Table 3-9 are assumed to travel about half of the available rail line distance, that is, 10 miles on the average, and at the heavy rail average speed of 24 miles per hour. Their person hours of travel are, 94,970 * (10/24) = 39,571. Then the 2030 estimate is:

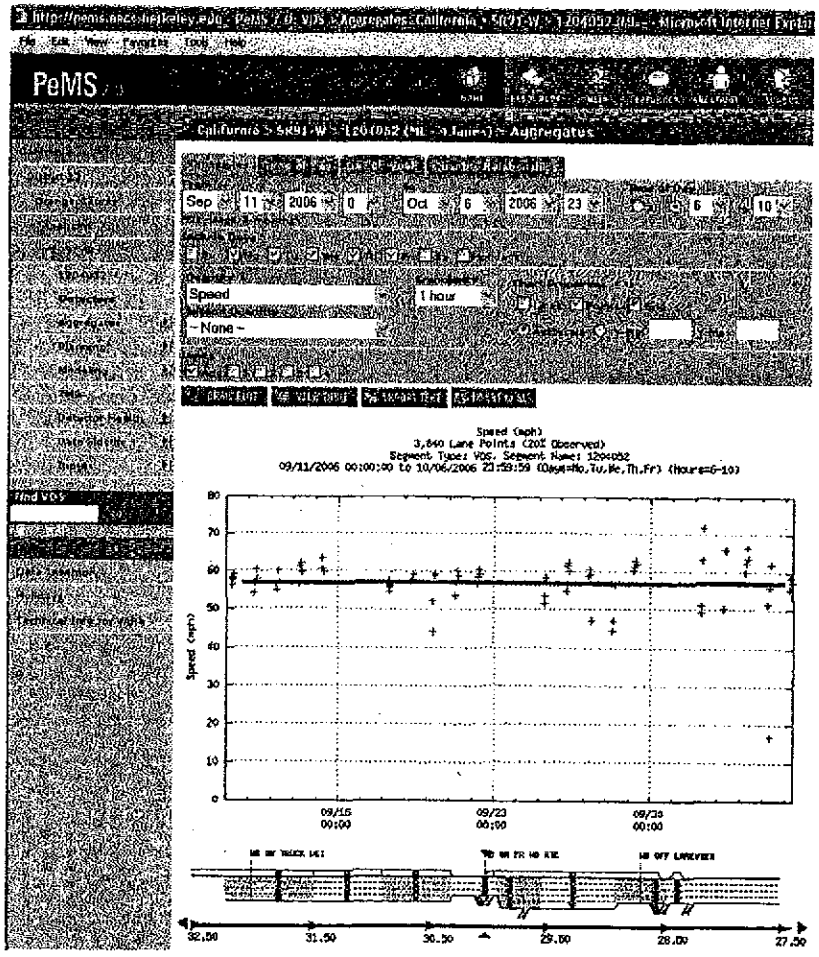
20-mile Rail Person Hours = 376,000/1.6 + 39,571 = *274,571* (2)

By comparing (1) and (2) it is clear that the hours spent traveling on Oahu with a 20-mile Rail line will be 11% longer than the No Build. It can be similarly proven that all Rail options will be worse than the No Build.

This outcome is not surprising because, at least in the U.S., the inability of new Rail systems to reduce traffic congestion is well established.

Appendix 2: Real Volume and Speed Operating Characteristics on California SR-91 Express Lanes





Appendix 3.a: Sample Comparisons of AA and Potential Traffic Performance

This set of estimates assumes that vehicular volume for ML is the same as the No Build. This is very conservative because in reality express buses will go from Waikele to Iwilei in 15 minutes.

	2003 Existing	2030 No Build	2030 ML wrong 2 lanes	2030 ML correct 2 lanes	2030 ML correct 3 lanes	2030 Rail (20)
H-1 Fwy	1.15	1.90	1.94	1.76	1.50	1.81
H-1 Fwy (HOV)	0.84	1.59	1.46	0.96	0.96	1.44
H-1 Fwy (Zipper)	0.89	1.29	NA	0.85	0.85	1.18
Moanalua Rd	0.97	0.60	0.57	0.57	0.57	0.50
Kamehameha Hwy	0.86	1.01	0.90	0.90	0.90	0.89
Managed Lane	NA	NA	0.79	0.86	0.86	NA

This set of estimates assumes that express buses will carry the same amount of passengers as the relatively slow and short 20 mile rail option. This is still conservative.

	2003 Existing	2030 No Build	2030 ML wrong 2 lanes	2030 ML correct 2 lanes	2030 ML correct 3 lanes	2030 Rail (20)
H-1 Fwy	1.15	1.90	1.94	1.55	1.29	1.81
H-1 Fwy (HOV)	0.84	1.59	1.46	0.96	0.96	1.44
H-1 Fwy (Zipper)	0.89	1.29	NA	0.85	0.85	1.18
Moanalua Rd	0.97	0.60	0.57	0.57	0.57	0.50
Kamehameha Hwy	0.86	1.01	0.90	0.90	0.90	0.89
Managed Lane	NA	NA	0.79	0.86	0.86	NA

(*) Kalauao Stream Koko Head bound

Highlighted cells show best 2030 V/c ratio -- lower ratio means less congestion.

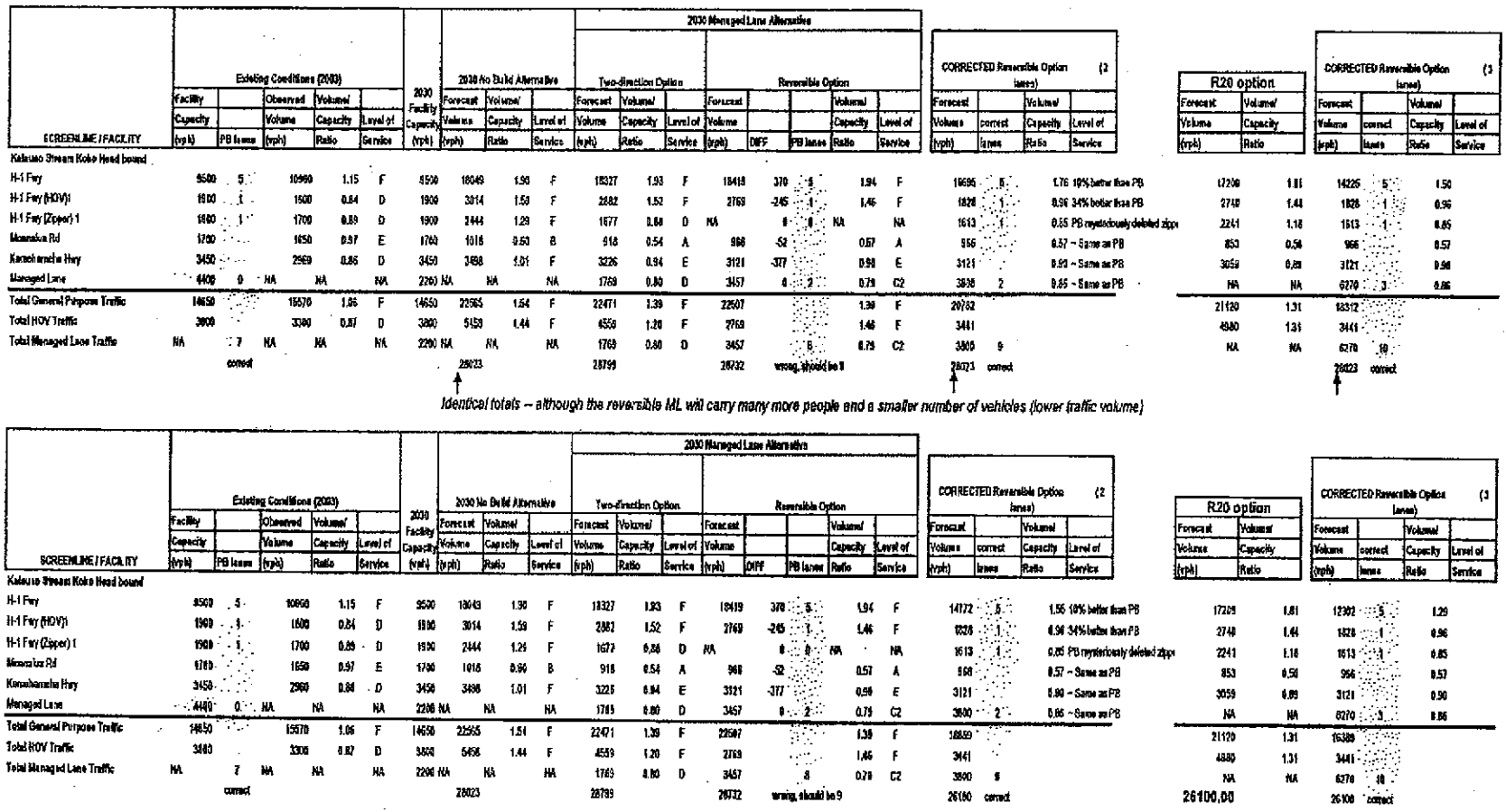
ML provides the most traffic relief for the AA's highly optimistic 2030 growth rates.

With a 3-lane ML and good express buses, congestion in 2030 will be similar to 2003.

Columns without any highlighted cells contain data exactly as they appear in City's AA.

Engineered to fail: The City added a 2-lane ML and deleted the AM zipper, for a net addition of a single lane! (See Table 3-12.) This is shown above as "ML wrong". "ML correct" has the zipper lane restored.

Appendix 3.b: Detailed Traffic Volume-to-Capacity Rations for a Cross-Section in Aiea



SCREENLINE / FACILITY	Existing Conditions (2003) Facility Capacity (vph)	PB lanes	Observed Volume (vph)	Volume/ Capacity Ratio	Level of Service	2030 Facility Capacity (vph)	2030 No Build Alternative Forecast Volume (vph)	Volume/ Capacity Ratio	Level of Service	2030 Managed Lane Alternative: Two-direction Option Forecast Volume (vph)	Volume/ Capacity Ratio	Level of Service	2030 Managed Lane Alternative: Reversible Option Forecast Volume (vph)	DIFF	PB lanes	Volume/ Capacity Ratio	Level of Service	CORRECTED Reversible Option (2 lanes) Forecast Volume (vph)	correct lanes	Volume/ Capacity Ratio	Level of Service		R20 option Forecast Volume (vph)	Volume/ Capacity Ratio	CORRECTED Reversible Option (3 lanes) Forecast Volume (vph)	correct lanes	Volume/ Capacity Ratio	Level of Service	
Kalauao Stream Koko Head bound																													
H-1 Fwy	9500	5	10990	1.15	F	9500	18049	1.90	F	18327	1.93	F	18419	370	5	1.94	F	14695	5	1.55	19% better than PB		17209	1.81	14225	5	1.50		
H-1 Fwy (HOV)	1900	1	1600	0.84	D	1900	3014	1.59	F	2882	1.52	F	2769	-245	1	1.46	F	1828	1	0.96	34% better than PB		2748	1.44	1828	1	0.96		
H-1 Fwy (Zipper) 1	1900	1	1700	0.89	D	1900	2444	1.29	F	1677	0.88	D	NA	0	0	NA	NA	1613	1	0.85	PB mysteriously deleted zipp		2241	1.18	1613	1	0.85		
Moanalua Rd	1700		1650	0.97	E	1700	1016	0.60	B	918	0.54	A	968	-52		0.57	A	956		0.57	~ Same as PB		853	0.50	956		0.57		
Kamehameha Hwy	3450		2969	0.86	D	3450	3488	1.01	F	3226	0.94	E	3121	-377		0.90	E	3121		0.90	~ Same as PB		3059	0.89	3121		0.90		
Managed Lane	4400	0	NA	NA		NA	2206	NA	NA	NA	1769	0.80	D	3457	0	2	0.79	C2	3800	2	0.86	~ Same as PB		NA	NA	6270	3	0.86		
Total General Purpose Traffic	14650		15570	1.06	F	14650	22565	1.54	F	22471	1.39	F	22507			1.39	F	20762					21120	1.31	16312				
Total HOV Traffic	3800		3300	0.87	D	3800	5459	1.44	F	4559	1.20	F	2769			1.46	F	3441					4880	1.31	3441				
Total Managed Lane Traffic	NA	7	NA	NA		NA	2206	NA	NA	NA	1769	0.80	D	3457		5	0.79	C2	3800	5				NA	NA	6270	10			
		correct					28023				28799			28732	wrong, should be 9				28023	correct						28023	correct			

Identical totals – although the reversible ML will carry many more people and a smaller number of vehicles (lower traffic volume)

SCREENLINE / FACILITY	Existing Conditions (2003) Facility Capacity (vph)	PB lanes	Observed Volume (vph)	Volume/ Capacity Ratio	Level of Service	2030 Facility Capacity (vph)	2030 No Build Alternative Forecast Volume (vph)	Volume/ Capacity Ratio	Level of Service	2030 Managed Lane Alternative: Two-direction Option Forecast Volume (vph)	Volume/ Capacity Ratio	Level of Service	2030 Managed Lane Alternative: Reversible Option Forecast Volume (vph)	DIFF	PB lanes	Volume/ Capacity Ratio	Level of Service	CORRECTED Reversible Option (2 lanes) Forecast Volume (vph)	correct lanes	Volume/ Capacity Ratio	Level of Service		R20 option Forecast Volume (vph)	Volume/ Capacity Ratio	CORRECTED Reversible Option (3 lanes) Forecast Volume (vph)	correct lanes	Volume/ Capacity Ratio	Level of Service	
Kalauao Stream Koko Head bound																													
H-1 Fwy	9500	5	10990	1.15	F	9500	18049	1.90	F	18327	1.93	F	18419	370	5	1.94	F	14772	5	1.55	19% better than PB		17209	1.81	12302	5	1.29		
H-1 Fwy (HOV)	1900	1	1600	0.84	D	1900	3014	1.59	F	2882	1.52	F	2769	-245	1	1.46	F	1828	1	0.96	34% better than PB		2748	1.44	1828	1	0.96		
H-1 Fwy (Zipper) 1	1900	1	1700	0.89	D	1900	2444	1.29	F	1677	0.88	D	NA	0	0	NA	NA	1613	1	0.85	PB mysteriously deleted zipp		2241	1.18	1613	1	0.85		
Moanalua Rd	1700		1650	0.97	E	1700	1016	0.60	B	918	0.54	A	968	-52		0.57	A	956		0.57	~ Same as PB		853	0.50	956		0.57		
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Managed Lane	4400	0	NA	NA		NA	2206	NA	NA	NA	1769	0.80	D	3457	0	2	0.79	C2	3800	2	0.86	~ Same as PB		NA	NA	6270	3	0.86		
Total General Purpose Traffic	14650		15570	1.06	F	14650	22565	1.54	F	22471	1.39	F	22507			1.39	F	18859					21120	1.31	16389				
Total HOV Traffic	3800		3300	0.87	D	3800	5459	1.44	F	4559	1.20	F	2769			1.46	F	3441					4880	1.31	3441				
Total Managed Lane Traffic	NA	7	NA	NA		NA	2206	NA	NA	NA	1769	0.80	D	3457		5	0.79	C2	3800	5				NA	NA	6270	10			
		correct					28023				28799			28732	wrong, should be 9				26100	correct				26100.00		26100	correct			

TRANSIT ADVISORY TASK FORCE

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Report of the Transit Task Force Technical Review Subcommittee
Construction Cost

The purpose of this report is to:

1. Determine if the estimated costs for the construction of the Managed Lane and Fixed Guideway Alternatives in the Alternatives Analysis Report for the Honolulu High-Capacity Transit Corridor Project are reasonable for the purposes of the report, and
2. Compare the estimated cost of the Managed Lane Alternative with the cost for the construction of the high-occupancy toll lanes on the Tampa-Hillsborough County Expressway.

In addition to the Alternatives Analysis Report, information was obtained from:

1. Toru Hamayasu, Department of Transportation Services
2. Clyde Shimizu, Parsons Brinkerhoff Quade and Douglas
3. Martin Stone, Tampa-Hillsborough County Expressway Authority
4. Paul Santo, Highways Division, Hawaii State DOT

Capital costs in the Alternatives Analysis Report for the construction of the Managed Lane Alternative are estimated at $2.6 billion; capital costs of $3.6 billion are projected for the 20-mile Alignment of the Fixed Guideway Alternative. The actual construction cost reported for the Tampa high-occupancy toll lanes was $300 million for construction (including both at-grade and elevated sections), plus $120 million to correct an engineering error in the construction of foundations for some of the support piers.

Both the Managed Lane and the Fixed Guideway Alternatives estimates use the same unit cost prices and cost calculation categories. These standardized cost categories are prescribed by the Federal Transit Administration to facilitate review of project cost information from all projects seeking Federal funding. The unit cost data (cost per cubic yard of concrete, cost per ton of reinforcing steel, etc.) were obtained from the most recent large-scale construction projects on Oahu, such as the construction of the Waimalu section of the H-1 highway viaduct widening, completed last year. DTS' consultants, Parsons Brinckerhoff, also made use of the U.S. Navy's unit cost construction cost data for Hawaii. Labor and other costs from the H-1 Waimalu Viaduct project were also used as inputs for Alternatives cost estimates. The cost per square foot of the Waimalu Viaduct, about $500 per square foot, was considered but not relied on because this work involved widening an existing elevated highway structure, which is known to be more expensive than new construction. The Alternatives Analysis data

yield an estimated cost to construct elevated highway structures on Oahu at $330 per square foot, and $390 per square foot in urban areas.

Construction costs for the elevated guideway needed for the Managed Lane Alternative were calculated on the same basis as the construction costs for the guideway structure for the Fixed Guideway Alternative. Both Alternatives are designed to meet AASHTO design standards for elevated highway structures, as was the Tampa tollway. As previously stated, costs for both Alternatives were calculated using the same per-unit cost elements (for concrete, steel, labor, etc.). Because the elevated structure for the Managed Lane Alternative would be 36 feet wide for its two travel lanes, whereas the structure for the fixed guideway would be only 26 feet wide, different diameter piers are necessary for each (8 feet versus 6 feet in diameter). However, where the managed lanes require only a single lane (e.g., an access/exit ramp), a 6 foot diameter support pier would be used, similar to and costing the same as the piers used for the fixed guideway. The span length between piers is 120 feet for both alternatives' structures. Portions of the structure for the fixed guideway will be significantly taller, 90 feet tall in some places, than the Managed Lane structure.

Capital cost for the Fixed Guideway Alternative would be approximately the same as the guideway cost for the Managed Lane if the following fixed-guideway-specific adjustments were made: (1) Subtract vehicle costs, system infrastructure cost, cost for downtown utilities relocation (the proposed Managed Lane Alternative does not reach downtown, where most utilities relocation costs are incurred); (2) Adjust for construction cost differences (e.g., structure width, different diameter piers); (3) Adjust for the Fixed Guideway Alternative's longer length and increased height.

Alternative lengths of the fixed guideway that could be built to fit budget limitations were addressed with the Department of Transportations Services and its consultant. For instance, $3 billion would build a system from UH at Manoa to Kaahumanu Street on Kamehameha Highway; $3.2 billion dollars would reach Acacia Road at Kamehameha Highway. If the Salt Lake Boulevard alignment were used, $3.2 billion would reach Leeward Community College but would not reach the Navy Drum Storage Area, which is planned for the fixed guideway storage and maintenance yard. An Ala Moana Center to UH link is estimated to cost $540 million and Ala Moana Center to Waikiki link is $490 million. The Department of Transportation Services has not made a detailed analysis of any Minimal Operating Segment (MOS) other than the 20-mile alignment discussed in the Alternatives Analysis.

According to DTS, the Navy Drum Storage site is the site closest to downtown that is feasible for the maintenance/vehicle storage yard, a necessity for a fixed guideway system. DTS reportedly looked at other possible sites, including the former Costco site, and rejected them because they were not large enough, or otherwise unacceptable. The lack of a suitable yard site closer to downtown requires the fixed guideway to

extend at least to the Navy Drum Storage site in the Ewa direction, thereby limiting the length of the 20 mile alternative guideway in the Koko Head direction.

The committee suggests that DTS reconsider the use of the Costco site as a maintenance/storage facility, at least on a temporary basis. This would avoid having the guideway end points dictated by the storage yard consideration. If the Costco site is not large enough by itself, perhaps the Federal Department of Defense would consider making available DOD-owned land adjacent to the Costco site, either on a temporary or permanent basis. Alternatively, would a smaller yard be adequate for the first years of fixed guideway operations, perhaps making use of unused running track for vehicle storage and limited vehicle maintenance? We understand that the Miami heavy rail system operated without a storage/maintenance facility for the first year or so after that system opened, and instead made use of available track for off-peak vehicle storage and maintenance.

Testimony before the Task Force has included repeated comparison of the actual cost to construct a three lane partially elevated toll highway in Tampa, Florida versus projected construction costs for necessary for the Managed Lane and Fixed Guideway Alternatives. The following comparison of the costs for the Managed Lane Alternative and the Tampa high-occupancy toll lanes is based on information obtained from the Department of Transportation Services, the Tampa-Hillsborough County Expressway Authority, and the Bridge Section of the Hawaii State Highways Division. The Managed Lane Alternative is 15.8 miles long with two lanes, built entirely on elevated structures. The Tampa high-occupancy toll (HOT) facility is 9.4 miles long, of which 4 miles is at grade, and approximately 5.4 miles is built on elevated structures. The Tampa HOT has three 12-foot lanes with two 10-foot shoulders, and is approximately 59 feet wide and was completed in 2004. The Managed Lane Alternative (assuming reversible lanes – both lanes operating Koko Head direction in the morning rush hour, and both lanes operating Ewa in the evening) is 36 feet wide (two 12-foot lanes, one 10-foot shoulder and one 2-foot shoulder).

Dr. Stone recommended that the proposed Managed Lane Alternative should be widened to three lanes based on the experience of the Tampa Expressway Authority. Further, the lanes should be reversible to gain the advantage of all three lanes in the heavily traveled direction during morning and evening peak hours. He further stated that there were insufficient access/exit ramps in the Honolulu proposal and expressed the opinion that the additional lanes and access/exit ramps would not add substantially to the cost of the project. In his view, he felt the cost estimate in the Alternatives Analysis was far too high.

Paul Santo stated that there is a substantial difference in cost for bridge construction between Hawaii and the mainland US. The State DOT Bridge Section presently uses $400 to $500 per square foot for planning purposes and expects the price will continue to rise and approach $1000 per square foot. By comparison, he said that most highway

agencies on the mainland use $100 to $200 per square foot with some even below $100. He believes the high cost in Hawaii is due to its location and the lack of competition. For instance, there is only one precast concrete plant in Hawaii to produce bridge girders. He understands some general contractors in Hawaii look to shipping girders from the mainland as was done by the contractor for the Ford Island causeway in Pearl Harbor. He further believes the cost for construction of the structures is impacted by the additional cost of utility relocation where the alignment of the facility follows existing rights-of-way, such as the Farrington Highway and Kamehameha Highway corridor for both the Managed Lane and Fixed Guideway Alternatives. In addition, construction costs are higher where work is accomplished within existing highways with high traffic volumes whereas the Tampa HOT lanes were built within an existing median, which appears to be nearly 30 feet wide.
Guideway construction cost estimates developed for the Alternatives Analysis are also high compared to Tampa high-occupancy toll lanes costs because the Alternative Analysis' projected costs include a 30% escalation for "soft costs" (engineering costs) and a 25% escalation on all costs for contingencies. The Tampa HOT cost ($300 million) represents actual construction costs only (including 16% for actual engineering costs), and was for a project that started in 2003. Clyde Shimizu pointed out that the per square foot costs of H-3 viaducts in 1990 ($180) exceeded the Tampa tollway costs incurred only a few years ago.

Since the Tampa tollway was built in the median of the existing expressway, there were no rights-of-way costs incurred. Where the Fixed Guideway or Managed Lane are built within existing State or City rights-of-way, land will be made available for the structures at no cost to the project.

The Tampa high-occupancy toll lanes do not cover capital and operating costs through HOT lanes tolls. Rather, the combined revenues from the expressway and the HOT tollway are used to meet operating and capital costs. Tollway fees are expected to rise from $1 to $1.50 next year. Bonds issued to finance construction of the original expressway, which opened for revenue service in 1975, have now been largely paid off or the debt refinanced, freeing up toll revenue from both the original expressway and the HOT lanes to subsidize the HOT lanes' construction costs.

In conclusion, the cost estimates for the Managed Lane and Fixed Guideways Alternatives in the Alternatives Analysis Report are reasonable. Further, a valid comparison of the costs for the Tampa tollway and the proposed Managed Lane cannot be made without substantial adjustments for differences in construction unit costs.

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Subcommittee Review of the Honolulu High-Capacity Transit Corridor Project Alternatives Analysis Chapter 5 – Financial Feasibility Analysis

December 13, 2006

Prepared by Transit Task Force Members:
Randal Ikeda
Cindy McMillan

[Note: the members of this Committee readily acknowledge that they are not financial analysts with experience in the evaluation of financial data for the financing of major capital projects. Except as reported below, they have not been able to recruit outside expertise to assist in a detailed review, given the short time available.]

Objectives

The purpose of our review was to determine the following:

- Does the chapter on financial feasibility (chapter 5) of the Alternative Analysis provide City Councilmembers with the information necessary to select a Locally Preferred Alternative?

Documents Reviewed and Experts Consulted

The following documents were reviewed:

- Honolulu High-Capacity Transit Corridor Project Alternatives Analysis
- Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS, 2006b)
- Scoping Report, Honolulu High-Capacity Transit Corridor Project (April 6, 2006)

In addition, conversations were held and/or e-mail dialogue was conducted with:

Paul H. Brewbaker, Ph.D
Chair, Council on Revenues
Senior Vice President and Chief Economist, Bank of Hawaii

Jack P. Suyderhoud, Ph.D.
Vice Chair, Council on Revenues
Professor of Business Economics, College of Business Administration, UH – Manoa

David Mieger, AICP
Director of Westside Planning
Los Angeles County Metropolitan Transportation Authority

David Glater
Transit Task Force Analyst

Funding Sources – Fixed Guideway Alternative

1. GET revenue predictions. Because of its central role in the financial plan for the Fixed Guideway alternative, we specifically consulted with experts to determine if the estimated revenues from the General Excise and Use Tax (GET) were reasonable. The methodology described below was reviewed by Jack P. Suyderhoud, Ph.D. who indicated that the estimates made in the Alternatives Analysis seem to be reasonable, with the caveats that there is always some inherent uncertainty in forecasting and that the greatest uncertainty in this case is how the new tax will affect reporting of non-Oahu transactions.

   Specifically, from the Honolulu Advertiser, Sunday, Dec. 10, 2006 "while the tax increase in the statewide excise tax only applies to O'ahu, the state has ruled that all companies selling products here — even those based on the Neighbor Islands — will have to pay the tax. So will O'ahu-based companies doing business primarily on the Neighbor Islands". DTS's consultant developed a 17% discount to Oahu's current percentage of the tax base in order to account for the historical over-reporting of Oahu based transactions. That discount factor is based on the primary assumption that the tax base percentage by island will equal the "de facto" population percentage by island. (Population estimates are provided by the State Department of Business, Economic Development and Tourism. The de facto population is defined as the number of persons physically present in an area, regardless of military status or usual place of residence. It includes visitors present but excludes residents temporarily absent. Oahu has 67% of the State's de facto population.) While this is a reasonable assumption, there is still no absolute way to predict actual tax reporting behavior.

   Process that DTS' consultant used to develop GET Surcharge Revenue Projections:

   1. Estimate of the State's overall tax base using historical patterns;

   2. Estimate of what proportion of the State's 4% tax base is attributable to Oahu. Ans. 81% based on historical patterns;

   3. Develop an additional adjustment to reflect businesses that are headquartered in Oahu, but that report some economic activity outside of the county, which income is therefore not subject to the tax surcharge; base assumption is that the percentage of the tax base by island, is equal to the percentage of population by island; therefore the current tax base percentage for Oahu is overstated by 81% - 67% = 14%; pro-rating the 14% over the Oahu current tax base percentage, results in the discount of 14% divided by 81% (14%/81%) = 17%;

   4. Apply 0.5% to the adjusted base; then subtract 10% for the State's administrative costs;

   5. Apply growth rates using the following three scenarios:

      a. Extrapolation of historical patterns (1990 – 2005) to 2022;
      b. Council on Revenue forecast growth rates to 2013 and then reversion to historical growth to 2022; or

c. Council on Revenue forecast growth to 2013 and continuation of that growth to 2022.

6. Present each revenue forecast with and without inflation.

2. Federal contribution to the Fixed Guideway alternative. The Alternatives Analysis assumes an FTA New Starts contribution of $933-948 million. Alternatives Analysis, tables 5-7, 5-8, p. 5-12. The FTA's share of the cost of a New Starts project has generally not exceeded $750 million, with limited exceptions – primarily for grants made to projects in the New York-New Jersey metropolitan area. When FTA does make a grant exceeding $750 million, the following statement is regularly included in the project description submitted to Congress: "FTA notes that MTA's [New York City's Metropolitan Transit Authority] New Starts funding request is higher than what has historically been provided to other major transit capital projects, but ...." (Text following the "but": "...the New Starts share of 26% is significantly lower than most other projects."). FTA New Starts Report to Congress, FY 2006, p. 15. (Some exceptions to this $750 million informal ceiling outside of the New York area: Los Angeles reportedly divided a single project into three "minimally operable segments" ("MOS"), and then separately applied for and obtained $650 million in New Starts funding for each MOS; Washington, DC Metro extension through Dulles corridor (MOS #1) – $920 million applied for (50% of costs). It should be noted that the amount Honolulu is seeking is 20-25% of total costs (depends on the funding actually obtained from the GET ½% surcharge). This percentage represents a smaller share of total project cost than FTA usually provides, and is comparable to the 26% contribution cited by FTA to support its grant to New York in excess of the usual ($750 million) amount.

   DTS Administration reports that FTA staff at both the regional and headquarters level has encouraged the City to aim high, and ask for what it reasonably needs. If the Full Corridor Alignment were selected by the Council as the Locally Preferred Alternative, could the project be broken into minimally operable segments as LA and Washington, DC have done, in order to keep the cost of the initial MOS phase under $3.2 billion, while maximizing Honolulu's New Starts Funding over the life of the entire project? Again assuming that the Full Corridor Alignment were selected, could a route alignment for sections 3, 4 and 5 be selected that would be less costly to build than the Alternatives Analysis' preferred alignment for these sections? For example, based on Table 5-2 of the Alternatives Analysis, what would be the impact of selecting the lower cost alignment of Salt Lake Boulevard – North King Street – Queen Street instead of the AA's preferred alignment for sections 3, 4 & 5? Would this lower cost alignment permit a MOS costing $3.2 billion (or less) and permit construction of an alignment beginning at the UH Manoa campus and extending at least to the Navy Drum Storage site – the proposed maintenance-vehicle storage yard? If so, how would this lower-cost alignment compare to the benefits for the AA's recommended alignment, and how would it be evaluated under the FTA's New Starts evaluation criteria?

3. Sharing the benefit of increased value of real property adjacent to fixed guideway facilities. The Alternative Analysis cites various means whereby the City could share in gains from property appreciation (tax increment financing; benefit assessment districts – see p. 5-9), however the report does not quantify the dollar potential of these revenue-producing value capture tools. Based on conversations with Paul Brewbaker, Ph.D., Chairman of the Council on Revenues, there will be

significant increases in the property values along the rail alignment. What mechanisms will the City put in place to use that increased value to help subsidize the construction and operation of the rail system? And what will the City do to discourage speculation on the rail alignment real estate to minimize land acquisition and development costs?

Funding Sources – Managed Lane Alternative

1. Is there a possibility of receiving New Starts funding for the Managed Lane Alternative?

   The Alternatives Analysis concludes that Federal New Starts funds would not be available for the Managed Lane Alternative "because of use by toll-paying single-occupancy vehicles, which are excluded from the statutory definition of 'fixed guideway' (49 USC Section 5302)." AA, p. 5 – 6. Would New Starts funds be available for this alternative if single-occupancy vehicles were prohibited from using the facilities? In other words, would New Starts funding be available if the managed lane facility were restricted to transit vehicles and high-occupancy toll-paying vehicles? If so, how much New Starts funding would be available for this alternative and would that significantly affect its financial feasibility or alter its status relative to the other alternatives? Would this be an unacceptable change in the Managed Lanes concept as proposed?

2. Managed Lanes toll revenue.

   The Alternatives Analysis states that the Managed Lanes – Reversible Option peak period toll would be $6:40 (2006 dollars) in 2030. How was that price determined? Would the demand be sufficiently inelastic to allow collection of higher tolls? Alternatively, if this toll exceeds what prospective West Oahu users can reasonably afford, these users may chose not to use the facility. In this circumstance, opening the facility to single-occupancy vehicles makes less sense. If these speculations have merit, this alternative could be redefined to exclude single-occupant vehicles, and to operate as an HOV lane. Although FTA is reportedly no longer funding HOV lanes under the New Starts program (because it considers these to be highway projects more appropriately financed by Highway Trust Funds), there be some operational mode that will meet FTA's eligibility criteria for New Starts funding and also satisfy Managed Lanes proponents.

Conclusion

Based on our review and research, we believe Chapter 5 – Financial Feasibility Analysis is based on reasonable assumptions and sound methodology. In general, there is adequate information for the Council to make "an intelligent selection of a preferred mode and general alignment."

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Appendix 2

Discussion-piece #6
Predicted and Actual Ridership of Proposed New Starts Projects
Federal Transit Administration
June 6, 2006

Purposes of ridership reviews. FTA periodically compares the actual ridership against the ridership predictions for major transit projects using Federal "New Starts" funds. The analysis has three purposes: (1) to provide an up-to-date picture on the reliability of ridership forecasts as the basis for decision-making on proposed New Starts projects; (2) to identify any needed improvements in the technical methods used to make the forecasts; and (3) to identify any appropriate modifications to the way that FTA uses New Starts forecasts in project evaluation.

Pickrell report. FTA published the initial review in 1990 in the report *Urban Rail Transit Projects: Forecast Versus Actual Ridership and Cost* (commonly referred to as the Pickrell report after its primary author). That review considered ten projects and found that only one project generated actual ridership that was more than 50 percent of the predicted ridership (specifically, 72 percent) Actual ridership for the other nine projects was less than 50 percent of their forecasts.

2003 report. FTA prepared (but has not yet released) the 2003 report *Predicted and Actual Impacts of New Starts Projects: Capital Cost, Operating Cost and Ridership Data* (hereafter termed the Phase-1 report) to consider the 19 New Starts projects (both rail and bus guideways) that opened for revenue service since the 1990 report. The post-1990 projects showed improvements in the quality of forecasts. Four of the 19 projects generated ridership that was between 70 and 80 percent of their forecasts. Another three projects generated ridership between 80 and 100 percent of their forecasts. And three projects had actual ridership that exceeded their forecasts by modest amounts. Table 1 summarizes the 19 projects, their ridership forecasts, and their actual (or extrapolated) ridership in the forecast year.

Pickrell update. The 2003 report also included an updated (year 2000) look at the ten projects reviewed by Pickrell. Two of those ten projects had year-2000 ridership close to forecast levels; two others showed growth since the 1990 report but were still far below forecast levels; three projects had little change in ridership; and three experienced declines in ridership since 1990.

Phase-1 conclusions. The 2003 report suggested several possible reasons for the improved quality of transit forecasts post-Pickrell, including greater forecasting experience, more formalized forecasting procedures and guidelines, increased scrutiny of forecasts and the planning process by government agencies and the public, improved forecasting technical methods, and improved computing technology. The report also observed forecasts for people movers, busways, and starter rail lines tended to be least reliable while forecasts for system expansions (additional lines in new corridors or extensions of existing lines in the same corridor) were relatively more reliable.

Phase-2. In 2006, further FTA-sponsored analysis of completed projects concluded in the draft report *Predicted and Actual Ridership of New Starts Projects: Detailed Analysis* (not yet released; hereafter the Phase-2 report) undertook detailed reviews of the ridership forecasts for seven of the nineteen Phase-1 projects (as identified in Table 1). This work faced a substantial hurdle in the general unavailability of detailed information on the forecasts themselves. The forecasts were prepared 10 to 20 years ago and supporting documents and data sets (zone-level demographics, trip tables, zone definitions, and coded transit and highway networks) were simply not available. The case studies included two "successful" forecasts that were within ±20 percent of actual ridership and five "less successful" forecasts that were more than twice the actual ridership.

Successful forecasts. The two projects with successful forecasts – San Diego El Cajon and Portland Westside – were expansions of existing light rail systems. While it was extremely difficult in a retrospective analysis to confirm the level of quality control and reasonableness checks during the forecasting process, a review of both the calibration and validation tests and the results, as well as transit paths and skims, suggests that these procedures have been more rigorously followed in areas with successful forecasts. To some extent, the success of the two forecasts was the product of offsetting errors. While both forecasts were within ±20 percent of actual project-specific ridership, both missed actual levels of systemwide ridership more than ±20 percent and relied upon corridor-level demographic forecasts that also varied from actual outcomes by more than +/- 20 percent.

Less-successful forecasts. The five less-successful forecasts appear to have been subject to multiple types of errors of varying magnitude. Sources of error included erroneous model inputs, problematic model properties, and mistakes in model application – and all forecasts were subject to more than one of these errors.

- Input errors. The most frequent error involved the magnitude and location of future population and employment growth, a problem in all seven of the case studies, contributing both to the less successful forecasts and the offsetting errors that may have masked other problems in the successful forecasts. Because transit relies heavily on walking for access/egress, errors in demographic forecasts at the regional and/or corridor levels are compounded by incorrect allocations to zones within walking distances of fixed-guideway stations. Other sources of input error include the representation of future-year transportation networks (both highway and transit), inadequate detail in the zone system used to represent the region, as well as prices for transit fares, gasoline, and parking. At least one (and usually more) of these input

errors specifically contributed to the forecasting error in each of the "less successful" case studies.

- Model-property errors. A common problem in the less-successful forecasts was the overestimation of future highway congestion. This problem may be the result of problematic demographic forecasts filtering through the model chain. However, overestimation of highway congestion appeared to occur even where regional trip tables generally replicated actual travel patterns indicated by census journey-to-work information and household surveys. In such cases the culprit is the model set itself, likely problems time-of-day distributions and/or network assignment.

- Model-application errors. Haste in the completion of forecasts to support funding application or environmental documents appears to have led to improper representation of changes in project scope or transit service plans in the travel forecasts. Other changes in scope and service plans have occurred after the forecasts were completed, without a corresponding update in the forecasts. In at least one case the model was validated to an outdated set of observed data before being used for the transit forecasts.

Absence of detailed records. While some insights were available from the seven case studies, by far the most significant outcome of the Phase-2 effort was the clear finding that useful comparisons of forecasts with actual outcome are not possible with the largely non-existent records of the forecasts. This outcome has significant implications for the usefulness of the Before-and-After studies that are now a required element of New Starts projects that receive Full Funding Grant Agreements and suggests the need to formalize the preservation of forecasts so that meaningful reviews of their accuracy are possible.

Table 1: Predicted and Actual Ridership for Phase-1 Projects - Forecast Year Comparison

Project	Forecast Year	Forecast Avg Weekday Boardings		Actual (projected) Boardings in Forecast Year	Ratio - Forecast yr actual/Forecast	
		AA/DEIS	FEIS		Actual vs. AA/DEIS	Actual vs. FEIS
Jacksonville ASE	1995	42,472	42,472	2,627[1]	6%	6%
Miami Omni/Brickell	2000	20,404	20,404	4,209	21%	21%
Houston SW Transitway *	2005	27,280	27,280	9,066	33%	33%
Atlanta North Line *	2005	57,120	57,120	21,595	38%	38%
LA Red Line *	2000	295,721	297,733	128,659[1]	44%	43%
Pittsburgh West B'Way	2005	23,369	23,369	10,200[3]	44%	44%
Chicago Orange Line *	2000	118,760	118,760	54,042	46%	46%
San Jose Guadalupe	1990	41,200	41,200	19,738[2]	48%	48%
San Jose Tasman West *	2005	14,875	13,845	9,110	61%	66%
Baltimore LRT Ext.	2005	11,804	12,230	8,207	70%	67%
Baltimore Johns Hopkins	2005	13,600	13,600	10,049	74%	74%
Portland Westside-Hillsboro *	1995/2005	60,314	49,448	49,999	83%	101%
Dallas South Oak Cliff	2005	34,170	34,170	29,307	86%	86%
BART Colma	2000	15,200	15,200	13,482	89%	89%
Salt Lake South LRT	2010	26,500	23,000	25,201	95%	110%
St. Louis Initial System	1995	41,800	37,100	43,711[4]	105%	118%
San Diego El Cajon *	2000	21,600	21,600	23,478	109%	109%
Denver SW LRT	2015	22,000	22,000	23,988[5]	109%	109%
St. Louis St. Clair Ext.	2010	11,960	20,274	16,965	142%	84%
Denver I-25 HOV	2000	not stated	not stated	8,853	NA	NA
Seattle Bus Tunnel	1990	not stated	not stated	44,400	NA	NA

(1) Actual boardings in forecast year given for 2001 since this is the first full year of operation.

(2) Actual boardings in forecast year given for 1992 since this is the first full year after opening

(3) Actual boardings are assumed to increase 1,200 daily riders over 2002 as an additional park and ride lot is completed.

(4) Actual boardings given for 1999 since Airport station did not open until 1998. Forecast year boardings reached by applying the average annual growth in transit boardings achieved by the project sponsor between 1990 and 2002.

(5) Denver has experienced relatively fast ridership growth over the past decade. Since the forecast year remains far in the future, continued growth at recent trends appears overly ambitious. FTA assumed that the Denver project will achieve a growth rate 2/3rds of the growth rate observed between 1990 and 2002. Even at this lower assumed growth rate, this project is very likely to exceed its AA/DEIS forecasts by a significant margin.

* Selected for detailed analysis in the Phase-2 study.

Table 2. Predicted and Actual Ridership for Phase II Case Studies: Summary of Findings by Project

City/Project Name	Summary of Findings
Atlanta MARTA North Line Extension	• 2005 observed boardings only 40% of forecast boardings • Observed rail system ridership less than forecast • Observed overall transit ridership close to forecast but widely fluctuates year-to-year • Forecasting error caused by failure to achieve predicted employment levels in station areas in primary travel market, underestimation of regional employment, fluctuations in overall system ridership, inaccurate transit coding conventions in the model, poor trip distribution model, over-reliance on mode choice adjustment factors, and validation to outdated observed data set.
Chicago CTA Orange Line	• 2000 observed project boardings only 46% of forecast boardings • Observed system-wide rail boardings close to forecast • Observed transit system boardings close to forecast • Forecasting error caused by failure to account for demographic changes in study area / corridor, and poor model structure, especially for trip distribution and mode choice
Houston METRO Southwest Transitway	• 2005 projected (from 2002 observed) boardings only 33% of forecast boardings • Observed transit system ridership less than forecast • Forecasting error caused by failure to achieve predicted population and employment levels in the study corridor and region, failure to achieve predicted land uses in station areas, overestimation of future highway congestion, poor transit coding and zone system, and changes to project following completion of forecasts
Los Angeles MTA Red Line	• 2001 (1st year of full line operation) observed boardings 43% of (2000) forecast boardings • Observed transit system boardings 72% of forecast boardings • Forecasting error caused by poor model inputs for transit fares, gasoline costs, fuel economy, poor transit-access coding, failure to achieve employment forecasts, failure to fully restructure background bus network to eliminate direct competition with line and provide feeder service, service changes due to conversion from trunk line to trunk/branch operations, relocation of line to less attractive transit corridor, and length of time needed to construct and operate full line
Portland Tri-Met Westside/ Hillsboro LRT	• 2002 observed boardings 8% over 2005 predicted boardings • 2001 observed LRT system boardings 3% over 2005 predicted boardings • Forecasting success caused by realistic and quality-controlled transit service inputs, previous experience operating LRT, higher than forecast population/employment growth • Approximately 10% to 15% of the success may be attributed to underestimation of growth • Good model features, such as extra trip purposes, cars per worker variable, use of choice models for demographic inputs, inclusion of non-mechanized trips in mode choice, good model accounting of transit accessibility and use of mode-of-access model in mode choice may have contributed to forecasting success • Errors in population and employment forecasts may have helped ridership forecast for project but are indicative of larger errors in the demographic and employment model (offsetting errors)
San Diego MTDB El Cajon LRT	• 2000 observed boardings 9% over 2000 predicted boardings • 2000 observed LRT system boardings 57% over 2000 predicted boardings • 2000 observed transit system boardings 2% over 2000 predicted boardings • Forecasting success caused by realistic model inputs and quality control, good model features, and greater than expected population and employment growth in the corridor • Approximately 15% to 20% of the success may be attributed to underestimation of growth • Errors in population and employment forecasts may have helped ridership forecast for project but are indicative of larger errors in the demographic and employment model (offsetting errors) • Large forecasting error for LRT system overall suggests problems with mode choice model
San Jose VTA Tasman West LRT	• 2005 observed boardings only 25% of 2005 predicted boardings • Forecasting error caused by severe economic contraction in corridor and surrounding region, overestimation of highway congestion, poor TAZ system, unrefined trip distribution model, poor network inputs, and poor transit assignment

Available at: www.fta.dot.gov/planning/newstarts/planning_environment_5402.html

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Appendix 3

Suggestions for further development of the Managed Lane Alternative.

- The Alternatives Analysis' description of the characteristics of the Managed Lane Alternative should provide more complete information as to mass transit operations utilizing this facility. The Alternatives Analysis states that new express and other bus transit routes would be developed for operation on the Managed Lane facility. (p. 2-4) A fuller development and presentation of the transit services that would accompany the Managed Lane Alternative would be helpful (e.g., routes, new/existing stations). There is no description in the Alternatives Analysis of any proposed supportive operational practices off of the Managed Lane facility that would complement the facility's use as a transit guideway, e.g., transit stations connected to park-and-ride facilities, reserved lanes for transit vehicles on existing streets, traffic signal priority for transit vehicles.

- In its discussion of travel time benefits of the Managed Lane options, the Alternatives Analysis projects that traffic congestion at both the H-1 Freeway access to the Managed Lane facility and at the Nimitz Highway exit at Pacific Street will negate travel time benefits gained from travel on the Managed Lane facility itself. The Analysis should explore how traffic congestion at these points could be alleviated (at least for mass transit vehicles) in order to enhance the overall performance of this Alternative as a transit guideway.

- The description of the Managed Lane Alternative in Chapter 2 of the Alternatives Analysis states "The H-1 zipper lane would be maintained in the Two-direction Option but discontinued in the Reversible Option." (p. 2-4). However, no explanation is provided as to why the zipper lane would not be continued in the Reversible Option. The Managed Lane Reversible Option's addition of two Koko Head-bound elevated lanes for the morning commute appears to result in a net increase of only one lane if the inbound zipper lane were removed.

- The foldout photographic plans presenting the Managed Lane Alternative (Alternatives Analysis, Figures 2 -- 1 and 2 -- 2) do not clearly depict the ramp lanes necessary to access the Managed Lane facility from Interstate Highways H-1 and H-2 in both the Two-direction Option and the Reversible Option, or the ramp lanes necessary to exit from the facility to these Interstate Highways.

- These plans show an approximately one-mile long "facility" in the vicinity of Kaonohi Street (Figure 2 -- 1), and another in the vicinity of Radford Drive (Figure 2 -- 2), however no description of these facilities is provided. In discussions with DTS Administration staff, these facilities have been identified as transit stations with attendant deceleration and acceleration lanes. Assuming this to be the case, it would be helpful to see the proposed location(s) of park-and-ride facilities planned near these stations, comparable to the information presented in Table 3 -- 5, with respect to the Fixed Guideway Alternative. It is not apparent whether the stations would operate in both the Two-direction Option and the Reversible Option. What are the cost implications of adding access/exit ramps for transit vehicles instead of building elevated transit stations?

- Figure 2 -- 2 shows a small section of the Managed Lane facility approximately 2000 feet Koko Head of the end of the facility at Nimitz Highway/Pacific Street. This component of the Managed Lane facility is not explained. Is it an elevated structure or at-grade? Which Managed Lane users would be allowed to access it?

- Figure 2 -- 1 shows two ramps in the vicinity of Aloha Stadium. It is not clear whether these ramps would be available in both the Two-direction Option and the Reversible Option, or whether these ramps would be available to other than transit vehicles (e.g., to vans, three-person and two-person automobiles, and/or single-occupant automobiles paying tolls).

See also Financing Committee's report discussing changes in permitted access to the Managed Lane facility that might make the facility eligible for New Starts and/or GET ½% surcharge funds.

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Appendix 4

Questions the Task Force posed to DTS Administration, and the answers received:

1. From the local press, there appears to be a willingness to spend 3.2 -- 3.6 billion dollars for a fixed guideway system, and considerable discomfort spending more than that. Can you calculate how much $3 billion (or $3.2 billion) would buy toward a system with the following alignments:

a) Beginning at UH-Manoa and running Ewa using the optimal alignment described in Chapter 6 of the Alternatives Analysis Report.

b) same question, but using the Salt Lake Blvd alignment instead of the Aolele Street alignment in Section 3, Aloha Stadium to Middle Street.

Answer to 1(a). $3.0 billion will reach Kaahumanu St. on Kamehameha Hwy from UH at Manoa. $3.2 billion will reach Acacia Rd at Kamehameha Hwy. Both will be short of reaching the yard site in the Navy Drum Storage.
Answer to 1(b): $3.2 billion will reach Leeward Community College via Salt Lake Blvd. It will not reach the Navy Drum Storage site.

2. What are the capital costs for the fixed guideway link between Ala Moana Center and the University -Manoa? Link between Ala Moana and Waikiki?
Answer: Ala Moana Center to UH link is estimated to be $540 million. Ala Moana Center to Waikiki is $490 million.

3. Has DTS analyzed any Minimal Operating Segment (MOS) other than the 20-mile alignment?
Answer: no.

4. How do the construction standards for the guideway for the Managed Lane Alternative (Alternative 3) differ from the standards applicable to construction of the guideway for the Fixed Guideway Alternative (Alternative 4)? Do construction costs for these two guideways differ?
[The response to this question is summarized in the report submitted by construction committee.]

5. Has the DTS analyzed the Managed Lane Alternative operated so as to qualify for FTA New Starts funding (no single-occupant vehicles)?
Answer (paraphrased): the Managed Lane Alternative is based on a proposal submitted by a member of the public approximately 1 year ago, in response to invitations to the public to come up with alternatives to a fixed guideway system. The primary differences are that the DTS Managed Lane Alternative now includes an off ramp at the stadium, and a station near Middle Street. If the Managed Lane Alternative excluded single-occupant vehicles, it would qualify as a HOV lane, however, FTA is no longer funding HOV lanes under the New Starts program because it considers these to be highway projects eligible for Highway Trust Funds.

6. How much would $3.2 billion buy toward a fixed guideway system that would begin at the Ala Moana Shopping Ctr. and then travel Ewa along the Administration's preferred alternative to Liliha St./Kaaahi St., then travel farther Ewa along N. King St., then (at Middle St.) travel Ewa along Moanalua Freeway to Salt Lake Blvd., then along Salt Lake Blvd. to the Kamehameha Highway to Farrington Highway to Kamokila Blvd. to Kapolei. (This route appears to be straighter and shorter than the "optimum" alignment specified in Ch. 6 of the Alternatives Analysis.)

[No answer received as yet]

7. What is the cost of a fixed guideway system that followed the above Koko Head – Ewa route alignment, but that stopped Ewa at Palehua Road?

[No answer received as yet]

8. The Alternatives Analysis identifies two possible sites for a maintenance/repair yard for use with a fixed guideway system: one on the north side of Farrington Hwy., opp. the DRHorton Development site, and an alternative on the south side of Farrington Hwy. just south of H-1 ["Navy Drum site"]. Have you identified any other sites that could be used for this purpose that are Koko Head of these two alternatives? If yes, what evaluation of these other sites have you done?

Answer: We looked at many possible sites during this project, including revisiting some sites that were considered in the past studies. We reviewed all possible open or underused sites between 15 to 20 acres. They included all parks and recreational facilities (e.g. Diamond Head, Ala Wai Golf Course, Thomas Square) and they were eliminated from further considerations. Some industrial use sites such as Sand Island, Keehi Lagoon, and Shafter Flat were evaluated and eliminated for various reasons; Sand Island – off line, Keehi – unsuitable soil condition, Shafter – Federal land. Other sites such as Alapai, Middle St., former Costco, and Block J are too small. UH Manoa Quarry and other public school sites were looked but did not pursue. Bottom line – nothing suitable east of the Navy Drum site.

From: Martin Stone, Ph.D., AICP
Director of Planning
Tampa-Hillsborough County Expressway Authority

To: The Honolulu Advertiser and other interested citizens of Honolulu

Recent comments in the Honolulu Advertiser by the chief planner of Honolulu call into question the objectivity of the City and its consultants in their performance of a very expensive transportation alternatives evaluation being paid for mostly by the federal government.

As the professional staff person responsible for planning Tampa's elevated Reversible Express Lanes project, I am astonished that a Hawaiian public official would intentionally misrepresent the facts associated with the cost and operation of our project – and how a similar managed lane project might provide true congestion relief for Honolulu at an affordable price.

Two weeks ago, three Honolulu City Council members visited Tampa to see our project and learn the truth. Not only did they view the project close up but they also had the opportunity to meet the people who conceived, financed, designed, and constructed the project. Chairman Donovan Del Cruz and Councilmen Todd Apo and Charles Djou all had a chance to see first-hand the realities of our project.

First, it is false to suggest that our project costs "skyrocketed" to $420 million from the original $300 million estimate. The truth is that a design error by an engineer resulted in the construction of 155 bridge foundations smaller then they should have been. It cost $120 million extra to reinforce those foundations properly. Had the professionally licensed engineer who designed the foundations not made that error, the additional concrete and steel required during the initial construction would have cost only a few million more than the original contract price. But, to ensure that we are open and honest about our project, we always include the additional $120 million and the reasons for it when we show people our price tag.

The original cost of the elevated portion of our project (5.5 miles long) was less than $120 million of the total project. So, even with the foundation reinforcements, the entire elevated part of our express lanes only cost about $240 million – less than $14 million per lane mile for 27.5 lane miles of the elevated segmental bridge portion of the express lanes.

Your city's chief planner knows this. But it seems he does not want you to know.

It is also wrong to claim that our elevated express lanes are only handling 4,000 trips a day. The project is actually handling more than three times that much even though we are not in full operation because we are still finishing the final construction punch-list. After only four months of partial operation, the reversible express lanes are now handling over 14,000 vehicles per weekday - 1,500 more per day then the original estimates of 12,500 average daily users forecast for the end of our first year of operation in our project's traffic and revenue studies. And, we made sure to build plenty of additional capacity to accommodate future growth (it would have been irresponsible for us not to plan sufficient capacity for the future too).

Your city's chief planner knows this too. He just does not want you to know.

And, by the way, the more than 14,000 vehicles a day that are using the express lanes means we are ahead of our financial goals for this portion of the expressway. In simple terms, to say that our project is not meeting its financial obligations and we are being "heavily subsidized by revenues from other toll roads" is a misrepresentation.

The Tampa Hillsborough County Expressway Authority owns only one road – and our elevated Reversible Express Lanes are part of that road. Our agency is completely self-funded. We operate with no tax dollars. All of our funding comes from revenue bonds and loans retired by the tolls we collect from our customers.

Last year (our 30th year of operation), the Lee Roy Selmon Crosstown Expressway handled more than 34 million trips with annual revenues of approximately $32 million. Within the past six years, the Authority refinanced all of the expressway debt with two new series of revenue bonds to expand our facilities by adding the Reversible Express Lanes project. Wall Street bond underwriters and sellers will not handle a $400 million bond issue for an organization that cannot pay its debt. While our express lanes were forecast to pay their fair share of that debt, they are already doing even better than that because many new customers have embraced the congestion-free travel provided by the lanes.

Anyone taking the time to query our General Engineering Consultant for a copy of our traffic and revenue reports knows this. Under Florida's Sunshine Law, all of this financial information is available to anyone who asks.

Apparently, your chief planner did not do his homework or is intentionally misleading you.

Actually, it is worse that that. The intentional distortion of the financial condition of our toll road is indicative of someone who desperately wants to manipulate public opinion in favor of a preordained outcome.

This type of dishonesty is not permitted by the canon of ethics of the American Institute of Certified Planners, but, since your chief planner is not a registered AICP member, he is not required to meet any professional planning standards of objectivity in the public interest. However, he is a member of the American Society of Civil Engineers (ASCE) and they have a well-defined Code of Ethics for their member's activities. ASCE Fundamental Principle #2 calls for engineers to uphold the integrity, honor, and dignity of the profession by "being honest and impartial and serving with fidelity the public..." Canon #3 says, "Engineers shall issue public statements only in an objective and truthful manner ... and shall not participate in the dissemination of untrue, unfair or exaggerated statements regarding engineering."

The statements presented by the chief planner of the City of Honolulu about our project are all virtually untrue or grossly exaggerated.

However, the biggest dishonesty of all is the claim by your chief planner and his hired guns that our elevated project was used as the model for the managed lane alternative they are using as a comparison to the fixed rail system in your alternatives analysis. It is completely dishonest to say the elevated HOT lane in your transit alternatives analysis is similar to our elevated reversible lanes. And, it is this dishonesty that results in your HOT lanes costing $2.6 billion instead of the less than $1 billion that a true copy of our project would cost.

Remember, anyone wanting to control the outcome of the alternatives analysis to favor the train would most certainly want to find a way to boost the cost of the elevated road concept.

Other than both being elevated, there is virtually nothing the same in the design of the two projects. Our bridge has three travel lanes. The Honolulu version is only two lanes wide and carries far less traffic (which, of course, makes it far less competitive with the train). Because our project design uses simple, low-cost slip ramps for access, it does not require any interchanges. Your managed lane alternative has a number of unnecessary and expensive interchanges. And, the cost estimates for design and construction management are five times more than the amount required for a concrete segmental bridge project. That alone adds $400 million dollars to the grossly overestimated cost of the managed lane alternative.

And, the cost estimate to reproduce our elevated reversible lanes project in Honolulu was not done on the back of an envelope. Our most recent project estimate (September, 2006) to determine the insurance replacement cost for our bridge was computed by our Authority's Chief Financial Officer, a man with a total of 30 years experience financing transportation — 22 of which were as the financial advisor to Florida's Governor and CFO for the Florida Department of Transportation Central Office. His estimate to build our 5.5 miles of bridge with today's high material and labor costs is $175 million. Extending that to

14 miles in length for the Honolulu HOT lanes alternative would bring the cost to $450 million. You can add any percentage you wish to compensate for higher construction costs in Hawaii, but it is easy to see why this project should not cost you more than $1 billion.

Your city's chief planner knows this too. He just does not want you to know.

Something else he does not want you to know: All of the cars that would use the HOT lanes to get to downtown are not new additional trips into the City. They represent a redistribution of the same trips you would have coming into downtown based on your population and employment. The HOT lanes will not produce new trips. They simply would divert trips away from your existing congested highways thus making the entire system work more efficiently. Growth in population, employment, and commercial development creates more trips. Nor do the HOT lanes create more parking problems in downtown Honolulu because they are the same cars that would be parking no matter which roadway they use to get to the City.

But, yes, anyone designing a new HOT lane will have to solve how traffic can best move in and out of the City. This would not be accomplished by dumping the traffic into only one location (as stated by your chief planner), but likely would involve multiple entrances and solutions that would address other traffic problems as already suggested by the University of Hawaii Civil Engineering department. These new gateway entrances into Honolulu would also provide opportunities for new private investment within your downtown as well as improve existing traffic flow.

Prior to opening our express lanes, the average 10-mile trip in the morning peak-hour took over thirty minutes. Since we opened for interim operations, we have achieved a 50% split in the peak-hours between our new Reversible Express Lanes and our existing expressway lanes. This has resulted in a complete balancing of our traffic between our upper and lower lanes with no congestion for any of our customers and an average trip time of 10 minutes for the 10 miles for everyone. The express lanes are already handling enough traffic volume in our morning peak hours to equal having an extra lane constructed on our Interstate into downtown Tampa (about 2,000 per lane per hour).

In addition, the elevated reversible expressway has been so successful that it is attracting 2,000 additional daily trips away from other non-tolled parallel roads. City of Tampa traffic managers report that all three parallel non-tolled roads are operating better in the peak hour because of diversions to our new express lanes. We could not be more pleased with the project — it is doing exactly what we thought it would — providing a safe, reliable, convenient, stress-free trip for people driving into and out of our city every day during what used to be terrible traffic congestion within our corridor.

And, our local transit agency is reporting a 20% increase in ridership on the express bus routes on our facility within less than three months.

Oh, by the way, the toll is presently $1.00 for the entire trip on the express lanes. However, we will be raising tolls next year to $1.50. Now, about the toll increase: Our agency normally raises its tolls about once every 8-10 years to keep up with the rising costs associated with inflation. Our last increase raised our tolls from $.75 to $1.00 for electronic toll customers in 1999. Our finance plan, identified next year's toll rate to go to $1.50 as a part of our standard toll rate policy — we did move it forward to help pay for the engineering error on our project. By the way, we are suing the engineering firm for $120 million and expect to recover a substantial amount of the money their error cost us.

Are we using the tolls to pay the debt service for our expressway, which includes this project, as well as our operating cost? Of course we are. That is how toll roads work. We build the road today for our needs today and tomorrow with money that we borrow and then pay back over time, just like the mortgage on your house. We get an asset with a useful life of 75-100 years, we get to use that asset immediately to address our problems today and in the future, and we pay for it as we use it. And, when we reach positive cash flow on a project, we typically use that money to finance even more transportation projects. That is a financial

approach long ago adopted by the State of Florida. In fact, toll agencies have built every new highway in Florida during the past 15 years, because, just like Hawaii, virtually all of our fuel taxes are dedicated to maintaining or improving the existing road system.

Thousands of people vote with their pocketbooks every day to use our road. If these customers do not want to pay for using our tollway, they do not have to. The key is they get to choose, unlike projects that many people do not want – projects that benefit only a few but all pay for through some general tax scheme. Toll roads are not forced on anyone. They serve those willing to pay. But, the entire community benefits, including those who do not use the road, because we improve traffic congestion by diverting traffic away from non-tolled highways and streets.

If you were to build HOT lanes in Honolulu, your public and private transit providers and high occupancy users would have a facility that will allow them to guarantee their arrival schedules. Transit riders would receive reliable, efficient service and automobile drivers would be able to take advantage of that capacity for a very reasonable price — at their discretion. Those who decide not to pay to use the HOT lanes would also benefit from the reduced congestion in the non-tolled lanes. The elimination from non-tolled highways of traffic comprised of buses, taxis, vanpools and carpools along with those auto drivers who decide to pay, will make things better for everyone.

We think that is pretty terrific; our customers think so too. And, if anyone on the City staff tells you a different story, they are either sadly misinformed or they are intentionally falsifying the facts to achieve a specific end.

June 20, 2006

Mr. Cliff Slater
Honolulutraffic.com
PO Box 15502
Honolulu, Hawaii 96830

Subject: Honolulu High-Capacity Transit Corridor Project Scoping Comments

Dear Mr. Slater,

Mahalo for submitting comments during the scoping process for the Honolulu High-Capacity Transit Corridor Project. Your comments, along with over 500 others, were reviewed and considered during the development of the final purpose and need, alternatives being evaluated in the Alternatives Analysis, and scope of environmental analysis for the project. The outcome of the scoping process is summarized in the scoping report which is available for review at the project website www.honolulutransit.org. All of the comments received during the scoping process are included in the appendices to the report, and also may be downloaded.

The No-build, Transportation System Management, Managed Lanes and Fixed Guideway alternatives will be evaluated in detail in the Alternatives Analysis. Once the Alternatives Analysis is complete, sufficient information will be available to select the optimal alternative for the corridor. A two-lane reversible option for the Managed Lanes Alternative, matching what you have proposed, has been added to the range of alternatives being evaluated in the Alternatives Analysis.

Project costs and operating revenues will be estimated as part of the financial analysis completed during the alternatives analysis process. Ridership forecasts are currently being developed to support the Alternatives Analysis. Transit travel time and reliability will be major factors in evaluating the performance of the various alternatives.

Environmental and social impacts and benefits of each proposed alternative will be addressed in the Alternatives Analysis and draft Environmental Impact Statement. They will be considered in the comparison of overall costs and benefits of the project alternatives.

The Honolulu High-Capacity Transit Corridor Project is evaluating one aspect of island-wide transportation needs in coordination with the Oahu Metropolitan Planning Organization, which is responsible for integrated transportation planning. The Honolulu High-Capacity Transit Corridor Project analysis is meant to evaluate project alternatives that may be constructed within the authorization of Act 247, enacted by the Hawaii state legislature in 2005. The act prohibits the construction of a non-transit project with the authorized excise-tax surcharge. Projects with the purpose of providing roadway mobility for automobiles and commercial vehicles are outside of the authorization of Act 247; therefore, they will not be considered for the Honolulu High-Capacity Transit Corridor Project.

Comments on how information was presented, comments were collected, and how the scoping process was conducted were reviewed and will be considered during future phases of the public involvement process. The project team has begun an extensive public information process to provide project details prior to selection of a locally preferred alternative (LPA). Public feedback will be solicited prior to selection of the LPA.

A transit system is only a portion of the entire transportation system. While the transit system will reduce the number of drivers on congested roadways within the corridor, the corridor is expected to continue experiencing growth in travel demand. The transportation corridor between Kapolei and the University of Hawaii at Manoa will continue to experience substantial traffic congestion; however, congestion in the corridor is expected to decrease somewhat after the system opens, and grow at a reduced rate after that time because of automobile trips diverted to transit. Travel demand projections will be developed for the Alternatives Analysis.

Sincerely,

MELVIN N. KAKU
Director

honolulutraffic.com

Seeking cost-effective ways to improve traffic congestion in Honolulu

January 9, 2006

Acting Director Alfred Tanaka
Department of Transportation Services
City and County of Honolulu
650 S. King Street, 3rd Floor
Honolulu, Hawaii 96813

Dear Mr. Tanaka:

Comments on the December 2005 Scoping Meetings

The Scoping Meeting conducted by Parsons Brinckerhoff and the City and County of Honolulu Department of Transportation Services (DTS) on December 13, 2005, provided insufficient information, both at the meeting and at the www.honolulutransit.com website, for the public to understand the cost-effectiveness of the alternatives.

While Parsons Brinckerhoff and DTS showed that the "Development of Initial Set of Alternatives" emerged from "Technical Methods" and "Evaluation Measures,"[i] they refused to disclose the quantitative data that they developed during this process thus denying full public access to key decisions.

For significant public involvement as specified by the Federal Transit Administration (FTA), the public must have some rudimentary understanding of the costs and benefits of each of the alternatives considered — both those accepted and those rejected.

The costs must include capital and operating costs. The benefits and disbenefits must include forecast travel time changes, patronage and traffic congestion impacts. Only with this information can the public be truly involved in the process.

In short, the 'system planning' process has failed to follow the FTA process, as follows:

A. The projected capital costs, operating costs, financing, travel times, patronage and traffic congestion for the alternatives have not been available.

B. The process has failed to define adequately the specific transportation problems let alone evaluate how each alternative addresses them.

C. The level of effort exerted in developing the alternatives has been insufficient.

D. The public has not been involved to the extent required by the FTA.

A. The projected cost effectiveness data have not been available to the public.

> "During systems planning, the analysis of alternatives focuses on identifying fatal flaws and a preliminary analysis of cost-effectiveness ... Three types of information are particularly important for evaluating cost-effectiveness: transit patronage, capital cost, and operating and maintenance cost." Procedures and Technical Methods for Transit Project Planning (PTMTPP). Part I. p. 2-9. (emphasis added)
>
> "When local officials seek [FTA] approval to initiate alternatives analysis, the results of system planning studies are used by [FTA] to decide whether to participate in further detailed study of guideway alternatives in the corridor. Much of the information needed to make these decisions should be available in reports produced during the system planning phase." PTMTPP, Part I, p. 2-12. (emphasis added)
>
> "These definitions [of alternatives] are sufficient to address such general concerns as ranges of costs, ridership potential and financial feasibility. More basically, they provide the information necessary for decisionmakers and other stakeholders to confirm that no reasonable alternative (in terms of meeting corridor needs) is being excluded from the analysis, as well as understand the magnitude of the costs and benefits associated with the various options for improving conditions in the corridor." Additional Guidance on Local Initiation of Alternatives Analysis Planning Studies (emphasis added)

The documentation required in the 'systems planning'[ii] process concerning public transit patronage data, capital cost and operating and maintenance costs, as required by the FTA has been either withheld from the public or not developed at all.

During the Scoping Meeting, we asked Mr. Hamayasu for cost data for the alternatives and he told us that the City did not have any. Since cost estimates are at the bedrock of scoping decisions it seemed strange that they were not available. This was especially true since Parsons Brinckerhoff had eliminated the reversible High-Occupancy\Toll (HOT) lanes proposal on the grounds of "cost and funding concerns."[iii]

Subsequent to the Scoping Meeting, Mr. Gordon Lum, Executive Director of the Oahu Metropolitan Planning Organization (OMPO) told us that the capital costs developed by their consultant were $2.5 billion each for both the reversible HOT lanes proposal, from Waipahu to the Keehi Interchange (±12 miles), and also the elevated heavy rail line from Kapolei to the University of Hawaii (UH) (±25 miles).

We asked to see the working for those calculations but Mr. Lum told us that their consultants, Kaku Associates, had only given them the number; there was no backup for it. He also said OMPO subsequently conveyed these projected costs to both DTS and the Hawaii State Department of Transportation (HDOT) and both had found them reasonable.

Failing any other explanation, we have to assume that Parsons Brinckerhoff and DTS used the OMPO costs in eliminating the reversible HOT lanes from the Alternatives Analysis.

The capital costs cited by OMPO are unreasonable. These costs, on a per mile basis, amount to $100 million per mile for the heavy rail line and $200 million per mile for the HOT lanes.

OMPO, HDOT, DTS and Parsons Brinckerhoff, would have us believe that a simple elevated *two*-lane highway (HOT lanes is merely the operating method) put out to bid would cost twice as much as a non-bid heavy rail line with all its attendant equipment, rolling stock, trains, and massive stations each with escalators, elevators, and stairs.

The Tampa, Florida, *three*-lane elevated highway due to open shortly costs $46 million per mile and that includes an expensive error by a contractor. The public authority responsible for it estimates they could duplicate it for $28 million per mile.[iv] Even allowing for Hawaii's politically induced high costs that tend to double Mainland prices, it still does not come close to the OMPO estimate of $200 million per mile.

No travel time comparisons are available. Since travel time is a major determinant of patronage forecasts and since HOT lanes may well offer a much faster journey for both autos and buses this information should have been available.

Patronage forecasts for the various alternatives are not available. Mr. Hamayasu told us during the meeting that while OMPO had developed ridership data for the rail, they had not shared it with DTS. We find this troubling since Mr. Hamayasu is Vice-Chair of OMPO's Technical Advisory Committee (TAC).

OMPO told us that while they had developed ridership forecasts for the various alternatives they would not show us the working of the calculations. We appealed this refusal to the Hawaii Office of Information Practices and OMPO now admits that their consultant's forecasts were "intuitive" and therefore there was no working paper to show us.[v]

We had asked for the working paper since the 360,000± daily rail ridership shown on their Strategic Planning Concepts chart (p. 6) for the Kapolei to University of Hawaii (UH) rail alternative would be an 80 percent increase over current ridership and a 50 percent increase in per capita ridership by 2030.

No Metropolitan Statistical Area (MSA) that has built a rail line in modern times has experienced an increase in the percentage of commuters using public transportation in a similar 20-year period, 1980-2000.[vi] We, therefore, find the ridership forecast preposterous failing a detailed, and credible, explanation.

The financing plan is not available.

> "The system planning phase produces a considerable amount of information that will later be used in alternatives analysis. This includes ... An analysis of the region's financial capacity to provide planned improvements ... and the capacity of the existing revenue base to meet future transit financial requirements." PTMTTP, Part I, page 2-2.
>
> "It is important that system planning consider such questions ... 'When compared with lower cost alternatives, are the added benefits of the project greater than the added costs?'" PTMTTP, Part I, page 2-5.

How can this question possibly be answered without quantifying the costs and benefits?

The financing plan needs to show the impacts of the one-half percent General Excise tax increase. Mayor Hanneman had originally asked for a full one percent when he was advocating the $2.7 billion Kapolei to Iwilei line.[vii] Since then his plan has extended to UH and Waikiki but the state legislature cut the tax increase in half. This would only fund a third of the heavy rail alternative; the public needs to know the correct amount of the future taxes they will face.

Traffic congestion estimates are not available. Since HOT lanes promise to move far more cars off the Oahu's highways than would a rail line, it is imperative that the city make the preliminary estimates available to the public.

Funding problems insufficiently explained. Mr. Hamayasu told us that one of the reasons the reversible HOT lanes was eliminated was because of "funding concerns" and that was because FTA had told him that they would not fund HOT lanes. We asked him if he had such an opinion in writing and he said he had not. Since FTA officials have told us that, while they would have to see the precise plans for such a HOT lanes project, if it provided priority and uncongested travel for buses, they believed they would.

In any case, the FTA does not require that funding be in place in order to analyze the alternatives. If it did, it would have to reject the rail alternatives since the half-percent increase in the State General Excise Tax does not begin to cover the capital and operating costs. In addition, the 1992 Rail Plan had no funding in place at any time during the whole process.

B. The process has failed to define adequately the specific transportation problems let alone evaluate how each alternative addresses them.

> "I. 2. Systems Planning. ... sets a proper foundation for moving forward into alternatives analysis ... system planning serves as the first phase of the five-phased process for developing fixed guideway mass transit projects." PTMTTP, Part I, page 2-1.
>
> "This analysis includes the identification of specific transportation problems in the corridor; the definition of reasonable alternative strategies to address these problems; the development of forecasts for these alternatives in terms of environmental, transportation, and financial impacts; and an evaluation of how each alternative addresses transportation problems, goals, and objectives in the corridor." PTMTTP, Part I, 1.2.
>
> "The key principal in the identification of alternatives is that they directly address the stated transportation problem in the corridor ..." PTMTPP, Part II, 2, p. 3.

The scoping information package merely discusses "improved person-mobility" and "improved mobility for travelers facing increasingly severe traffic congestion."[viii] This is misleading information to give to the public. It implies that the process is about reducing traffic congestion when it is clear — with some careful reading — that it is about getting people out of cars and into public transportation. However, Parsons Brinckerhoff does not tell the public that that is their explicit purpose. Neither do they tell the public that no other MSA has managed to reduce the market share of commuters using automobiles.[ix]

If the transportation problem is defined as one of insufficient "person mobility" then one set of alternatives may be preferable, usually centered on public transportation. If on the other hand, Parsons Brinckerhoff were to define the problem as the public

understands it, "excessive traffic congestion hampering the movement of autos and goods vehicles," then another set of alternatives will be preferred, centering around highways.

If we had a public transportation problem, we would not have had a significant decline in the per capita use of it during the past 20 years — from 96 rides per capita of population to 77 just before the strike. To make it worse this 20 percent decline occurred during a period when we increased the bus fleet by 20 percent. (State Data Books 1991 & 2004)

Conversely, during this same period, Oahu has had a 27 percent increase in registered vehicles with an increase of only a minuscule 2.2 miles of new freeways, from 86.3 to 88.5 miles — a 2.7 percent increase. (State Data Books 1991 & 2004.)

Hawaii has the fewest urban miles of highway of any state in the U.S. because highway construction has not kept pace with residential growth. No Metropolitan Statistical Area (metro area) in the U.S. has reduced traffic congestion by improving public transportation. We can only reduce it by increasing highway facilities and improving highway management and the Texas Transportation Institute concurs in that as follows:

> "The difference between lane-mile increases and traffic growth compares the change in supply and demand. If roadway capacity has been added at the same rate as travel, the deficit will be zero." 2005 Urban Mobility Report. Texas Transportation Institute.

In addition, Parsons Brinckerhoff has not addressed the negative effects on our economy of the high cost of delivering goods on congested highways. They have ignored national, state and city formal transportation goals as follows:

> "Advance accessible, efficient, intermodal transportation for the movement of people and goods." Federal Transportation Policy.
>
> "To create a transportation system which will enable people and goods to move safely, efficiently, and at reasonable cost." City and County of Honolulu, General Plan for the City and County of Honolulu
>
> "To provide for the safe, economic, efficient, and convenient movement of people and goods." State of Hawaii, Hawaii State Plan

Rail transit does absolutely nothing for the movement of goods "safely, efficiently, and at reasonable cost." Parsons Brinckerhoff has entirely overlooked that goods move by roads on Oahu, while admitting — only when asked — that building a rail line will not reduce traffic congestion.[x]

This community needs a definition of the transportation problem with which everyone can agree and that is without doubt going to be 'traffic congestion.' Honolulu does not have a public transportation problem; it has a traffic congestion problem. This is the problem that Parsons Brinckerhoff and DTS need to address.

C. The alternatives are inadequate and the "level of effort" exerted in developing them insufficient.

"There's small choice in rotten apples."

This line from Shakespeare's *The Taming of the Shrew* is, appropriately, the opening line in the FTA's introduction to *Evaluation of the Alternatives.*[xi]

Each prior rail transit effort in Honolulu from the 1970s on has suffered from the same problem; the range of alternatives studied was inadequate and deliberately so. Disinterested experts have all commented on it.

> "Finally, the most serious deficiency of analyses done to date is the failure to devise and evaluate meaningful alternatives to HART. The so-called "alternatives analysis" is seriously deficient and the bus alternative considered in them can only be considered as "straw men." Dr. John Kain, Chair of Harvard's Economics Department. 1978.[xii]

> "In particular, what is lacking is a serious investigation of several viable dedicated busway options." Dr. Robert Cervero, Professor of Urban and Regional Planning, UC-Berkeley. 1991.[xiii]

Many more examples are available from experts' critiques of the 1990 Alternatives Analysis both on line and at the Honolulu Municipal Library.[xiv]

The reversible two-lane HOT lanes should be reinstated as an alternative.

Our proposal is for a two-lane reversible, elevated HOT lane highway between the H1/H2 merge near Waikele and Pier 16 near Hilo Hatties. This kind of HOT lanes approach has also been termed Virtual Exclusive Busway (VEB) and Bus/Rapid Transit. HOT lanes projects already in place elsewhere have demonstrated the viability of such an alternative.[xv]

During the 2002 Governor's Conference on Transitways, Mr. Mike Schneider, executive vice-president of Parsons Brinckerhoff, told the conference that the reversible tollway proposal giving buses and vanpools priority at no charge was the way the city should have planned its now defunct bus/rapid transit (BRT) program.

Interestingly, a month prior to the conference, Parsons Brinckerhoff prepared and released the state final environmental impact statement for the BRT declaring that:

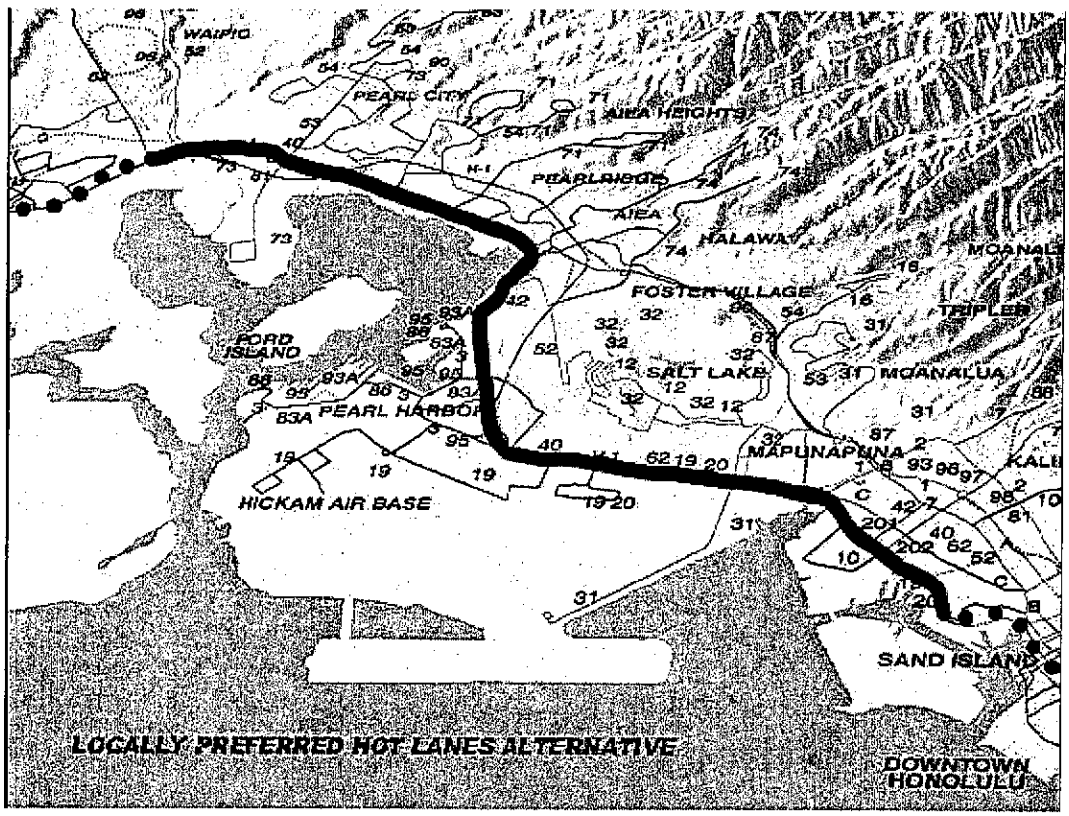
> "The light rail transit alternative was dropped because subsequent analyses revealed that Bus/Rapid Transit using electric-powered vehicles could accomplish virtually all of the objectives of light rail transit at substantially less cost."[xvi]

On the HOT lanes, buses and vanpools would have priority and travel free, other vehicles would pay a toll that would be collected electronically by way of a pre-paid smart card, as is quite commonplace on the mainland today.

As on the San Diego I-15 HOT lanes, computers would dynamically calculate the toll price every few minutes to keep the lanes full, but free flowing.

One of the more surprising outcomes of implementing HOT lanes has been that they are popular with motorists across all income groups. Even those who use them rarely, still favor them because it is an option they can use when the need warrants it.[xvii]

A single highway lane with free-flowing non-stop traffic carries up to 2,000 vehicles per hour and with two lanes that means removing 4,000 vehicles from the existing freeway, or 25 percent of the current rush hour traffic using that corridor.



Our projection of the HOT lanes traffic of around 4,000 vehicles does not have to be calculated since we know that rush-hour highways are always fully used; it is only the toll price that that needs to be forecast.

Judging from San Diego's I-15 and Orange County's SR-91, the average cost will be about $4.50 under normal circumstances and up to $7.75 for special periods such as Friday evenings.[xviii]

HOT lanes may well offer a much faster journey for buses in comparison to trains. The total trip from Mililani to UH is an example:

- Neither the rail line nor the HOT lanes will be going to Mililani, and so from Mililani to the H1/H2 merge, both rail and HOT lanes alternatives will take the same time by bus. At the H1/H2 merge, the train option would always require a transfer whereas the buses on HOT lanes may not.
- Buses on the 10-12 miles of HOT lanes traveling at 55-60 mph (SkyBuses?) to Pier 16 will take half as much time as trains on the heavy rail line.
- Pier 16 to UH is 4.2 miles and we anticipate that trains would take half as much time as buses for this much shorter distance.

However, the time savings for the buses on HOT lanes will not be offset by the time lost by the bus alternative on the shorter in-town leg. The net result of the time taken for these two journeys would be that HOT lanes would still offer a faster journey than trains and, in addition, not mar the city's residential areas with an overhead rail line.

The major advantages of HOT lanes are:

- Traffic can travel at uncongested freeway speeds of 60mph whereas rail transit can only average 22.5 mph because of stops averaging every half mile.[xix]
- Buses on HOT lanes may travel door-to-door whereas rail nearly always requires transfers.
- HOT lanes offer both motorists and bus riders a choice of avoiding traffic congestion.
- The regular freeways will still be available and with less congestion than before since some 4,000 cars per hour will have been removed from them.
- Express buses using the HOT lanes can return on the far less congested regular freeway in the opposite direction and the HOT lane speed will enable buses to make two trips in the time it now takes to make one.

Options for the HOT lanes proposal that need further study are:

- The feasibility of a three-lane section from the H1/H2 merge to the Pearl Harbor area and then continuing on to Pier 16 as two lanes. This could service the considerable traffic that terminates at Pearl Harbor, Honolulu Airport, the Airport Industrial area, and the Mapunapuna industrial area. The three-lane version could still be of pedestal construction similar to the new Tampa, Florida, Expressway.
- The utility of extending the Ewa end of the HOT lanes further beyond the H1/H2 merge.

Most importantly, HOT lanes meet the requirements needed to maximize public transportation use explained by Dr. Melvin Webber, now Emeritus Professor of Urban Planning, UC-Berkeley in Honolulu 20 years ago,

> "Commuters choose among available transport modes mostly on the basis of comparative money costs and time costs of the total commute trip, door-to-door. Other attributes, such as comfort and privacy, are trivial as compared with expenditures of dollars and minutes. Commuters charge up the time spent in waiting for and getting into a vehicle at several times the rate they apply to travel inside a moving vehicle. This means that the closer a vehicle comes to both a commuter's house and workplace, the more likely he is to use that vehicle rather than some other. It also means that the fewer the number of transfers between vehicles, the better".[xx]

As we have detailed in this letter, the level of effort in data development so far has been insufficient to justify the elimination of the HOT lanes alternative.

> "The system planning effort should recognize the difference between the foregoing of precision and the sacrifice of accuracy in the technical work, so that estimates of costs and impacts, while coarse, are at least approximate indicators of the potential merits of the alternatives. The level of effort must be designed so that additional effort would not result in the choice of a different preferred alternative." PTMTPP, Part II, 2.2, p. 2. [emphasis added]

Parsons Brinckerhoff has substituted, in place of the reversible HOT lanes, a Managed Lanes Alternative, a two-lane elevated highway with one lane in each direction. This has been designed to fail the alternatives analysis process. As U-C Berkeley's Professor Robert Cervero said of the 1992 choice of rail, "it is less a reflection on the work of [Parsons Brinckerhoff] and more an outcome of pressures exerted by various political and special interest groups."[xxi]

This Managed Lane Alternative, for which there appears to be no precedent, is a "straw man" designed to make the rail transit line look good in comparison. Professor Kain has written extensively about such tactics, "Nearly all, if not all, assessments of rail transit systems have used costly and poorly designed all-bus alternatives to make the proposed rail systems appear better than they are."[xxii]

Instead, we believe that the new high-tech HOT lanes have shown such promise and such public — though not political — acceptance that they may be a far preferable alternative.

D. The public has not been involved to the extent required by FTA.

> "The goal of this [joint FTA/FHWA] policy statement is to aggressively support proactive public involvement at all stages of planning and project development. State departments of transportation, metropolitan planning organizations, and transportation providers are required to develop, with the public, effective involvement processes which are tailored to local conditions. The performance standards for these proactive public involvement processes include early and continuous involvement; reasonable public availability of technical and other information; collaborative input on alternatives, evaluation criteria and mitigation needs; open public meetings where matters related to Federal-aid highway and transit programs are being considered; and open access to the decision-making process prior to closure." (emphasis added)
> http://www.fta.dot.gov/grant_programs/transportation_planning/planning_environment/3854_8227_ENG_HTML.htm

> "The overall objective of an area's public involvement process is that it be proactive, provide complete information, timely public notice, full public access to key decisions, and opportunities for early and continuing involvement (23CFR450.212(a) and 450.316(b)(1))." (emphasis added) http://www.fhwa.dot.gov/environment/pub_inv/q2.htm

Clearly, as can be seen from the foregoing, our state and local agencies have hindered the public from getting access to information let alone granting "full public access to key decisions."

Further, the agencies are abetted in their endeavors by the 'strategic misrepresentations' of our local and federal elected officials.

Far from "aggressively supporting proactive public involvement," our elected officials, who are part of the process, have acted contrary to FTA policy by misleading the public about the prospects for rail transit in that:

- They continually allude to the idea that building rail transit will result in traffic congestion relief when even Parsons Brinckerhoff[xxiii] says it will not affect traffic congestion in addition to there being no evidence from any other metro area that such is the case.[xxiv]
- They relentlessly use the term 'light' rail when, in reality, they are pushing a 'heavy' rail line.[xxv]
- They imply that the half-percent increase in the county General Excise Tax will be sufficient to pay for rail.[xxvi]

The public frustration with the lack of information was evident from the coverage of the scoping meetings by our newspapers. As the head of the Outdoor Circle's environmental committee said, "It seems to have been designed in a way to limit public interaction"[xxvii]

The net result of Parsons Brinckerhoff and DTS's outreach efforts is that the public believes that a rail transit line will significantly reduce traffic congestion and that it will only cost a half per cent increase in the GE tax. Neither the City nor DTS have made any effort to dispel these myths.

Summary:

The culmination of the current process will be a request by DTS to advance into alternatives analysis. FTA then "reviews this request and supporting technical documentation to determine whether system planning requirements have been met and that the threshold criteria for initiating alternatives analysis have been satisfied." (PTMTTP, Part I, page 2-12.)

Clearly, on the four counts enumerated here, the process is grossly flawed:

- Little, if any, quantitative information has been developed, let alone given to the public.
- The transportation problem is inadequately defined and there has been no evaluation of how the alternatives address specific transportation problems.
- The alternatives are insufficient and Parsons Brinckerhoff's decision prior to the Scoping Meeting to eliminate the reversible HOT lanes alternative was completely unjustified. They made this decision without any disclosure of the impacts of HOT lanes on traffic congestion, patronage, cost, or any other quantitative details that would allow the public to understand the decision. Nor did Parsons Brinckerhoff explain the selection criteria used in eliminating HOT lanes — let alone the weighting of the criteria in the scoring process.
- The process so far makes a mockery of "public involvement" as spelled out in FTA guidance and as defined in the preamble to Hawaii's Uniform Information Practices Act:

  [§92F-2] Purposes; rules of construction. In a democracy, the people are vested with the ultimate decision-making power. Government agencies exist to aid the people in the formation and conduct of public policy. Opening up the government processes to public

> scrutiny and participation is the only viable and reasonable method of protecting the public's interest. Therefore the legislature declares that it is the policy of this State that the formation and conduct of public policy—the discussions, deliberations, decisions, and action of government agencies—shall be conducted as openly as possible.

Accordingly, we believe that Parsons Brinckerhoff, OMPO, and DTS should revisit the process leading up to the Scoping Meeting and redevelop the alternatives according to FTA rules and guidance. Only then can our community have a Scoping Meeting in which the public will be involved according to both the letter and spirit of the law.

Sincerely,

HONOLULUTRAFFIC.COM

Cliff Slater
Chair

cc: Ms. Donna Turchie, Region IX, Federal Transit Administration
Mr. Toru Hamayasu, Chief Planner, Honolulu DTS

Endnotes:

i Scoping Meeting, page 4.3.

ii "1.2.1 Systems Planning. Systems planning refers to the continuing, comprehensive, and coordinated transportation planning process carried out by metropolitan planning organizations - in cooperation with state Departments of Transportation, local transit operators, and affected local governments - in urbanized areas throughout the country. This planning process results in the development of long range multimodal transportation plans and short term improvement programs, as well as a number of other transportation and air quality analyses." Procedures and Technical Methods for Transit Project Planning (PTMTPP), Part I, 1."

iii Scoping Information package. December 5, 2005. page 3-1.

iv According to Braden Smith, CFO of Tampa-Hillsborough Expressway Authority (813) 272-6740 the Tampa cost should have been $28 million a mile for the three-lane elevated highway and not the $46 million a mile it is costing. An expensive error made by wrong assumptions about the soil substrate by the designer caused the cost overrun.

v Letter from the Office of Information Practices to Slater and Lum.

vi http://www.fhwa.dot.gov/ctpp/jtw/contents.htm

vii http://the.honoluluadvertiser.com/article/2005/Aug/22/ln/FP508220329.html

http://www.co.honolulu.hi.us/nco/nb18/05/18marmin.htm

http://the.honoluluadvertiser.com/article/2003/Oct/28/ln/ln03a.html

http://the.honoluluadvertiser.com/article/2005/Mar/22/ln/ln20p.html

http://starbulletin.com/2003/10/28/news/story2.html

viii http://www.honolulutransit.org/pdfs/scoping_info.pdf

ix http://www.fhwa.dot.gov/ctpp/jtw/contents.htm

x Honolulu Advertiser article, December 14, 2005.

xi PTMTPP. Part II. Sec. 9.

xii Seminar on Urban Mass Transit (transcript). Office of the Legislative Auditor, State of Hawaii. January 1978. Dr. John Kain, Chairman, Dept. of City and Regional Planning, Harvard University.

xiii Quoted from "An Evaluation of the Honolulu Rapid Transit Development Project's Alternative Analysis and Draft Environmental Impact Statement." Hawaii Office of State Planning and University of Hawaii. May 1990. Robert Cervero, Professor of Urban and Regional Planning at the University of California, Berkeley, and a member of the Editorial Board, Journal of the American Planning Association.

xiv An Evaluation of the Honolulu Rapid Transit Development Project's Alternative Analysis and Draft Environmental Impact Statement. Hawaii Office of State Planning and University of Hawaii.May 1990.

xv http://www.hhh.umn.edu/centers/slp/projects/conpric/index.htm

xvi State FEIS for the Bus/Rapid Transit Program. November 2002. Prepared by Parsons Brinckerhoff Quade & Douglas. p. 2-4.

xvii http://www.honolulutraffic.com/lexuslane.htm

xviii Orange County's SR-91 lanes are not dynamically priced as are those of the San Diego I-15. However, the SR-91 administrators try to emulate dynamic pricing with fixed prices which allows us to examine what Hawaii prices might look like by time of day. http://www.91expresslanes.com/tollschedules.asp

xix http://www.honolulutraffic.com/railspeed.pdf

xx Dr. Melvin Webber, UC Berkeley. Address to the Governor's Conference on Videotex, Transportation and Energy Conservation. Hawaii State Dept. of Planning and Economic Development. July 1984.

xxi "An Evaluation of the Honolulu Rapid Transit Development Project's Alternative Analysis and Draft Environmental Impact Statement." Hawaii Office of State Planning and University of Hawaii. May 1990.

xxii Kain, John F. "The Use of Straw Men in the Economic Evaluation of Rail Transport Projects." American Economic Review, Vol. 82, No. 2, Papers and Proceedings of the Hundred and Fourth Annual Meeting of the American Economic Association (May, 1992) , pp. 487-493.

xxiii http://starbulletin.com/2005/12/14/news/story02.html

http://the.honoluluadvertiser.com/article/2005/Dec/14/ln/FP512140342.html

xxiv This video of, Mayor Hanneman and Rep. Neil Abercrombie's city hall "Traffic sucks!" rally held on December 5th, 2005, typifies the grossly misleading statements emanating from our elected officials.
http://mfile.akamai.com/12891/wmv/vod.ibsys.com/2005/0707/4695365.200k.asx

"Judging by how much traffic has worsened in just in the past few years, that's probably a conservative prediction. The only way to prevent it is to act now to address the problem. Our

quality of life is at stake. Rail transit is a key element in the solution." Congressman Neil Abercrombie. Honolulu Advertiser. April 17, 2005

"Hannemann said the yet-to-be-determined form of transit would run from Kapolei to downtown and the University of Hawai'i-Manoa. He said the system will help all parts of the island, easing traffic overall because 'there'll be less cars on the road.'" http://the.honoluluadvertiser.com/article/2005/May/12/ln/ln02p.html

Mayor's Press Secretary: "Slater misrepresents just about everything Mayor Mufi Hannemann, Transportation Services Director Ed Hirata and other supporters of transit have said, from the timing of federal requirements to tax calculations, highway capacity and a rail system's potential to ease traffic congestion." http://the.honoluluadvertiser.com/article/2005/Aug/10/op/508100321.html

Transcript of Councilmember Barbara Marshall questioning U.S. Rep. Neil Abercrombie (D-Hawaii) http://hawaiireporter.com/story.aspx?696a58e3-9a81-411e-b977-2688f5595685

"Mayor Mufi Hannemann chided Lingle at the rally and said the city needs a rail system to alleviate increasing traffic congestion. U.S. Rep. Neil Abercrombie, D-Hawaii, also blasted a possible veto and said that he and the rest of Hawaii have had enough of the traffic problems. He said commuters are fed up and don't need anymore "Lingle lanes" filled with traffic congestion." http://www.bizjournals.com/pacific/stories/2005/07/04/daily18.html?t=printable

xxv DTS and elected officials continually refer to "light rail" despite constant criticism from us and others.

xxvi Half per cent will pay for about one-third of the projected rail line according to our calculations. Mayor Hanneman originally asked for a full one percent at a time when he was seeking a shorter $2.7 billion line from Kapolei to Iwilei. Now he plans extending it to UH and Waikiki and the tax increase has been reduced to a half of one percent.

xxvii http://starbulletin.com/2005/12/14/news/story02.html

http://the.honoluluadvertiser.com/article/2005/Dec/14/ln/FP512140342.html

April 13, 2007

Department of Transportation Services
C&C of Honolulu
650 South King Street, 3rd floor
Honolulu, HI 96815

Attention: Honolulu High Capacity Transit Corridor Project

I am writing to comment on the process through which the City and County Government has narrowed its mass transit choices to the "Fixed Guideway Alternative." I believe that decision process was faulty in that public input was ignored in favor of pre-conceived Administration decisions. It was clear during Council hearings and other public forums that alternative solutions were not on the table. It also became clear that the solving Honolulu's traffic problem was not a primary objective of the project. And it became clear that there was not a broad public consensus in favor of the "Fixed Guideway Alternative" solution being pushed by the Administration. Finally, it became clear that the decision process was driven by politics and not engineering, financial or transportation considerations.

More affordable alternatives, such as Managed Lanes, were proposed. They were even supported by empirical data showing that they actually offer traffic relief. These alternatives were discarded early in the process, and tax measures to support mass transit funding were worded to specifically exclude such alternatives from consideration.

I believe that many who favor the rail solution find that the decision process lacked credibility. I also believe that the only solution at this point is to re-open the decision process, this time to include the citizens who will pay for the answer. **This issue should go on the ballot for voters to decide.** Then let the various advocates convince the voters which is the best solution. The outcome then will have community support.

Robert R. Kessler
Co-Chair, LET HONOLULU VOTE
444 Nahua Street, PH 9
Honolulu, HI 96815
Ph. 922-6188

August 13, 2006

Letter to the Editor

As I read the public discourse about the pending rail transit system, I notice one interesting point. The opponents of rail claim that it will do nothing to relieve traffic congestion, and the rail advocates don't dispute this claim. That tells me there are more issues on the table than meet the eye.

Rail opponents seem to be focused on offering real traffic solutions, such as High Occupancy Toll (HOT) lanes, that can be built at a fraction of the $4,000 per capita that the rail system is expected to cost. Solutions that will be self supporting through tolls collected from users to cover operating and maintenance costs. And that will be accessible to emergency vehicles as well as city and school buses. And that will actually reduce commute time for those willing to pay the toll.

While rail advocates acknowledge that rail will not relieve traffic congestion, they argue that rail will offer commuters "choices". Those choices apparently do not include getting to work any faster since a rail system will have to operate somewhat like a streetcar, making frequent stops, if it is to accommodate passengers from various neighborhoods. Those choices do not include alternate routes for emergency vehicles or city buses. Nor are those choices available to commuters from the Windward side or East Oahu.

On the other hand, there are some choices that will be precluded altogether by rail. Many residents in the path of the rail system will not have the choice to stay in their homes. While the number of homes that will have to be condemned for rail right-of- way probably is statistically small, if your home is one of them statistics be damned.

Nor will Oahu's residents have any choice about surrendering $4,000 per person which might otherwise be spent on tuition, or toward a new home, or braces for the kids, or groceries. That includes those residents - in Waimanalo, for example - who will never have convenient access to the rail system they're paying for.

So, if it's not about traffic congestion, what are the real issues and why should we spend the money? A cynic might think it was about big taxes, jobs and a ribbon-cutting ceremony. Or one might argue that rail stimulates the economy in those communities through which it passes. Such arguments might be acceptable if those were rail's marketing themes. But they're not. Rail is being sold as a transportation solution despite general acceptance on all sides that it is not.

It seems that an issue this big and expensive, one that will affect everyone on Oahu for decades, deserves serious debate and real public participation. Rather than letting ourselves be sold this project by political stakeholders who already have their minds made up, it seems we should demand that the rail issue be decided by the voters of Honolulu, through referendum. Put it on the ballot and make our elected officials convince the electorate why rail is the right thing to do.

Robert R. Kessler, Waikiki
Co-Chair, LET HONOLULU VOTE
Ph. 922-6188

Appendix A-3: Business NEPA Scoping Comments

April 13, 2007

Mr. Melvin Kaku, Director
Department of Transportation Services
City & County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Attention: Honolulu High-Capacity Transit Corridor Project

Comments re PROJECT LEGITIMACY, ENVIRONMENTAL, SOCIAL AND ECONOMIC IMPACTS TO BE ANALYZED

PURPOSE & NEED

"The transportation and traffic safety problem" on Oahu is severe lane-deficiency and traffic congestion even though ORTP 2030 and the Scoping Document fail to even mention road shortage and the proposed fixed rail alternative is projected to increase, not decrease, traffic congestion. Central Oahu and Ewa- Ewa Beach suffer the most severe and protracted congestion. While residents and businesses complain about traffic congestion costs and delays, the public transit operator seems oblivious to traffic congestion consequencese.

The proposed "high-capacity fixed guideway project" lacks justification and credibility due to lack of information and data for projects' legitimacy and prioritization process.

The public needs specific data and information for accountability and evaluation of the transportation system and infrastructure past, present and future — in order to prioritize and fund future projects rationally. There has been or is no conditions and performance report from OMPO or in the ORTP 2030. Statistical data as to rating and measurements of progress or decline by specific past and present periods are needed. ORTP 2030 and Scoping document focus primarily on future projections not on past performance in preservation and protection of the infrastructure, and rates of traffic congestion increase, the safety performance and identification of specific hazardous driving areas and conditions.

The public needs — the ORTP 2030 and the Scoping Document fail to provide — past and current data tracking changes by specific segments' travel time index, vehicle-to-capacity ratio, road miles, lane miles, time of day non-commute usage. The public needs — no data has been provided — as to the extent and cost deferred maintenance in pavement and other preservation and restoration of existing transportation infrastructure and facilities.

The public needs — the ORTP 2030 and Scoping Document fail to provide - record of increase and/or decline of lane and road capacities by specific areas where population and jobs increase and/or decrease.

FHWA shows Honolulu as having the least urban road miles per capita at 1.5 miles in the US and territories. (FHWA selected highway statistics 2000).

1970-2000: On Oahu, population grew 40% while road miles grew 28%. (Hawaii DBEDT statistics: Population 630.528: 876.156, Roads 1212.2: 1547.6)

ORTP 2030 population projections are unreliable for development planning purposes.

2000-2006: Oahu had a net domestic outmigration of minus-5,720, except for alien immigration.
http://www.hawaii.gov/dbedt/info/census/popestimate/2006-county-population-hawaii/County_Population_Facts_2006.pdf

1995-2000: The U.S. Census Bureau did a special report in which Hawaii tops all other states (the District of Columbia being the only place higher with -87.1% outmigration) in out-migration rates between 1995-2000:

-69.8 negative net migration of "young, single and college education"
-65.4 negative net migration of "population aged 5 and over"

As the census report indicates:

> "The relative influence of this small population is far greater than its size would suggest. Immigration of young people, whether single or married, carries the potential of population growth through future childbearing. When the young people moving into an area are also college educated, they provide a measure of economic opportunity in the area, while simultaneously serving to raise the area's stock of 'human capital.' This increase, in turn, fosters future economic growth in sectors in which education plays a key role."
> - U.S. Census report "Migration of the Young, Single and College Educated: 1995-2000" [i]

Oahu's population increase is of destitute immigrants and homeless residents

Compact for Free Association migration:

"The last Census in 2003 shows an increase of 35 percent from the previous 6 years in terms of migrants from these areas [Palau, the Federated States of Micronesia and the Marshall Islands] to Hawaii or a total of 7,300 a year, including many who arrive without any family, home, job or the ability to speak English."

Hawaii Foodbank:

"[T]he non-profit collects about 9 million pounds of food annually from supermarkets, distributors and wholesalers, and then distributes the food through 250 agencies to more than 118,000 different individuals each week on Oahu. The demographics of people seeking food donations has changed, Grimm says. Up until recently, there were many seniors on fixed incomes who needed food, but today

agencies are seeing more young parents working in low-income jobs. The vast majority -- around 70 percent -- of our clientele are gainfully employed at low wage jobs, but have difficulty in making ends meet."

City 'Takes Back Crown Jewel' From Homeless Squatters', Hawaii Reporter, 3/28/2006http://hawaiireporter.com/storyPrint.aspx?312c075e-4385-44cf-a7ec-1279d12e67aa**Hawaii's Housing Boom Takes a Toll on the Homeless**, WSJ 1/11/07, http://online.wsj.com/article_email/SB116845808553872913-lMyQjAxMDE3NjE4MTQxNTE4Wj.html; **Homelessness brings shame on all in Hawaii**, http://starbulletin.com/2006/07/02/editorial/editorial01.html

SOCIAL & EQUITY ISSUES

ORTP 2030 focus is on high end Kapolei development

The grouping under EWA in the ORTP 2030 says "EWA" but means "KAPOLEI": the two (or three if you count Waipahu) areas differ in residents' affluence and property values. Kapolei is planned for the highly affluent, whereas Ewa and Waipahu residents are ordinary middle income folks.

ORTP 2030's "Ewa" projections more than double in population increase, and more than triple in job increase, but developments focused mainly in Kapolei. The areas and size of developments investments are limited mainly to Kapolei. The projections are highly optimistic with no assessment as to risks and downsides.

- Kapolei: East Kapolei / UH West Oahu / Hunt / DRHorton (Schuler Homes) / Downtown Kapolei / Kroc / DHHL
- Ewa: Ewa / Ewa Beach / Iroquois Beach / Ocean Pointe / Gentry
- Waipahu: Waipahu / Kunia / Waikele

Land development patterns will mainly be unchanged except for high end development in Kapolei

ORTP 2030 paints a promising development future for Oahu's growth. But, the prospects of development are limited to high end growth.

See "The Quiet Revolution Redux: How Selected Local Governments Have Fared," David L. Callies, 2002 Pace University School of Law:

"The LUC still fulfills this role, and the percentage of land in each classification has changed almost imperceptibly over the past thirty years, with the vast majority of the state's land evenly split between the conservation zone (48%) and the agriculture zone (48%).[1] Indeed, a look at the land use maps in Oahu, formally the City and County of Honolulu--the most heavily populated (by far) of the state's four major island

[1] *See* DAVID L. CALLIES ET AL., CASES AND MATERIALS ON LAND USE 690 (3d ed. 1999).

counties--clearly demonstrates that land development patterns have remained largely the same. There has been incremental growth in existing urban areas, with the exception of the new "second city" of Kapolei, sprouting west of Pearl Harbor on former plantation agricultural land.[2] Much of the watershed remains in the conservation district under the control of another state agency, the Department of Land and Natural Resources,[3] whose Land Board divides that substantial acreage into a series of subzones and permits very limited (usually single-family homes on large tracts) use in only one, the so-called "general" subzone (although in the past the Board has permitted both a golf course and a college campus on conservation land).[4]

"What limited, relatively large-lot residential development is permitted in the zone is just that - **limited, usually to high-end residential development**. Even that is under attack by many who would like to preserve the land and challenge the common county perception that residential use divorced from "real" agricultural production is in fact a permissible use in an agricultural district.[5] Golf courses are a permitted use on much of the land, either by right or as a special use on prime agricultural land,[6] but with well over fifty golf courses in the state and tourism in a long slump, the market for such courses is in the main saturated.[7]

West Oahu region is significantly less dense than Central Oahu or the PUC

Because of the greater land mass of the Waianae / Ewa / Central Oahu corridor, the density is significantly less and therefore incomparable to the density in the Primary Urban Center.

Central Oahu's population of 148,000 is 63% of current Waianae / Ewa / Central Oahu population, projected to grow to 189,000 to be 48% of 2030 projected population of 394,000.

Ewa's 69,000 population is 29% of the current 235,000 population in Waianae / Ewa / Central Oahu. Ewa's projected population increase of 116,000 is still only 63% of Central Oahu's population of 189,000 in 2030.

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[2] *See generally* Kapolei, Hawaii, *available* at http:// www.kapolei.com/home.html (describing the location and plans for the area, with current and future maps) (last visited June 3, 2002).

[3] *See* HAW. REV. STAT. § 205-5(a) (2001); HAW. REV. STAT. § 183- 31 (2000).

[4] DAVID L. CALLIES, PRESERVING PARADISE: WHY REGULATION WON'T WORK 19- 20 (1994).

[5] Testimony of Christopher Yuen, Planning Director of the County of Hawaii, In re Appeal of Continental Properties (Zoning Board of Appeals Nov. 9, 2001) (on file with author).

[6] HAW. REV. STAT. § 205-2(d) (2001).

[7] OFFICE OF STATE PLANNING, GOLF COURSE DEVELOPMENT IN HAWAII: IMPACTS AND POLICY RECOMMENDATIONS 3 (1992).

Environmental justice considerations are mentioned, but rail is planned for the highly affluent commuteres — "the type of people who will not ride a bus." In the US DOT's Conditions &* Performance Report for 2006, FTA's "New Starts" prioritization process is supposedly to fund programs that yield the greatest benefits for "the public." Exactly 'who' is "the public" as to the proposed "high capacity transit project": "the affluent," the "choice riders," "the silver visitors" or the transit-dependent riders?

ALTERNATIVES

The Managed Lanes Alternative (reversible elevated HOT lanes) for West Oahu offers a distinct advantage of being flexible to serve multiple uses: priority first for transit users as well as emergency services, and allowing variably-priced toll paying low occupancy vehicle usage in order to guarantee a high speed throughput. Instead, the recent Alternatives Analysis significantly handicapped the Managed Lane alternative, contrary to FTA guideline 2.4 item 2 stating that *"Each alternative should be defined to optimize its performance."*
[Source: http://www.fta.dot.gov/documents/Definitions_of_Alternatives.pdf]

An Island-Wide School Bus Alternative offers a demand-management opportunity to raise vehicle occupancy by grouping student riders for public and private schools, colleges and universities. Depending on demand, the vehicles could be diverse: vans, minibuses or buses. A market-focused School Bus Alternative offers a lower-cost alternative for specific days and hours, instead of running 20 hours every day. Vouchers should be considered to partially subsidize cash or monthly fares.

Island-Wide Private Transit Alternatives including shuttles, offer the opportunity to supplement the public transit operations during peak and for low ridership routes and particularly for elderly and disabled riders. Vouchers should be considered to partially subsidize cash or monthly fares.

ECONOMIC ISSUES

We are deeply concerned about hindrances to circulation and hazardous driving conditions affecting the conduct and operations of business, commerce and industry road users.

The displacement of lanes and/or shrinkage of lane widths to accommodate the fixed guideway ground-level piers — within the corridor and citywide in the primary urban center — are unacceptable as the roads are max'd out already.

Increased congestion, noise, visual obstructions on the in-town transit route will impact driving safety and efficiency. The added risks of accidents, injuries and property damages are costly to businesses' bottom lines.

Should Kapolei or Waikele or Central Oahu be the "other end" of a fixed guideway

system or of other alternative(s)?

Will the average household income (or to be) higher than in Kapolei compared to citywide other than Kakaako, Downtown, Waikiki - Kahala

Is car ownership in Kapolei (or to be) higher in comparison to Citywide?

Is the transit-dependents' ridership heaviest in the primary urban center or dispersed among all areas in similar ratio?

Is the elderly and disabled peoples' ridership heaviest in the primary urban center or dispersed among all areas in similar ratio?

Federal Highway Trust Fund is anticipated to be in deficit by 2009. Will the public be provided clear and full information as to the effects of such revenue shrinkage on the proposed ORTP 2030 projects and what is the fall-back plan, identify the prioritization process?

State HTF is in severe crisis: will the public be provided clear and full information as to what the effect of such revenue shortfall will be on the proposed ORTP 2030 projects, and what is the fall-back plan, identify the prioritization process?

With shrinking and depleting federal and state contributions to the project, what will be the local taxpayers increased burdens for the project(s) listed in the ORTP 2030? What project(s) will be sidelined, what will be the process of eliminating project(s)?

What is the full Aspirations List for Oahu and how and what prioritization system was/is/will be used for rating funding and project justification?

How much and which taxes and fees need to be increased: fuel taxes, vehicle taxees, GETaxes, property taxes, other fees — to make up for federal and state funding shortfalls?

If the high cost rail project is eliminated in the event of shrinking federal and local funding, will the remaining projects be fully funded without tax or fee increases?

If the high cost rail project is eliminated, will the GETax by Honolulu County be repealed and the collections refunded to the taxpayers?

Respectfully submitted,
Dale Evans, President & CEO
Charley's Taxi & Radio Dispatch Corp.
680 Ala Moana Boulevard, Suite 303
Honolulu, Hawaii 96813-5409

[1] http://www.census.gov/prod/2003pubs/censr-12.pdf

April 15, 2007

Mr. Melvin Kaku, Director
Department of Transportation Services
City & County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Attention: Honolulu High-Capacity Transit Corridor Project

Supplemental Comments re PROJECT LEGITIMACY, ENVIRONMENTAL, SOCIAL AND ECONOMIC IMPACTS TO BE ANALYZED

Dear Mr. Kaku:

We respectfully request to supplement our comments of April 13th, 2007, to clarify the following:

Traffic safety on Oahu is in serious crisis

"The simple truth is that you can buy the safest car available, drive carefully, and still be in danger because the road itself is working against you. ... But fixing problems gets expensive quickly. And in times of tight budgets, states and localities are often left without enough to do the job."

American Automobile Association: [T]raffic safety is a major public health issue. "It's the big challenge for the 21st century."

National Highway Traffic Safety Administration's former head Diane Steed: "[O]ur roads are not safe enough and it's time to bring this the floor."

— Reader's Digest, **Safe Car, Safe Driver, Dangerous Roads, Jun 10, 2003**

Pedestrians

"Every day on average, one or two people get hit by a car as they're walking on a street somewhere on O'ahu. Most of the accidents occur in a six-mile long area between Kapahulu and Kalihi."

Where danger treads, Honolulu Advertiser, May 29 2005
http://the.honoluluadvertiser.com/article/2005/May/29/ln/ln01p.html

Planners tend to blame people for causing accidents.
No. 1 crash spot on Oahu? At Beretania, Alakea streets, Honolulu Advertiser, Apr 13, 2007
http://the.honoluluadvertiser.com/article/2007/Apr/12/ln/FP704120365.html

Bad Roads

But according to this report in Reader's Digest, **Safe Car, Safe Driver, Dangerous Roads, Jun 10, 2003**, "the road itself is working against you."
http://www.roadwaysafety.org/ReaderDigest.pdf

> *"Across America's four (4) million miles of blacktop, every day a multitude of dangers await you and your vehicle: poorly designed and outdated roads, shoddily maintained thoroughfares, inadequate signs and lighting, and a lack of safe crosswalks for pedestrians. The simple truth is that you can buy the safest car available, drive carefully, and still be in danger because the road itself is working against you. ... But fixing problems gets expensive quickly. And in times of tight budgets, states and localities are often left without enough to do the job."*

Oahu motorists, pedestrians and bicyclists experience the same potentially dangerous roadway conditions as are listed in the Roadway Safety Foundation's Roadway Safety Guide. (Emphasis added.)
http://www.roadwaysafety.org/chap1_2.html

> ***Roadway departure hazards:*** *Vehicles leaving the roadway, regardless of cause, represent approximately 15,000 deaths per year. Roadway departure crashes occur on both straight and curved sections of roadway and often involve either rollover of a vehicle or collisions with fixed objects such as trees and utility poles. Roadside hazards also include steep side slopes, drainage ditches along the roadway, and narrow shoulders not large enough to accommodate a vehicle in trouble.*
> ***Road surface conditions:*** *How often have you said or heard, "Boy, that road is slick in nasty weather," or "That road is so full of potholes, I feel like I'm driving on an obstacle course!" Aberrations in the road surface, such as pavement edge drop-offs, potholes and reductions in surface friction due to age, wear, inadequate drainage during rain storms, and incomplete winter maintenance to remove ice or snow obviously impair vehicle stopping and maneuvering capabilities.*
> ***Narrow roadways and bridges:*** *Narrow roadways make it difficult for drivers to safely maneuver in emergency and nonemergency situations—there simply isn't enough room! Narrow bridges are particularly hazardous. Collisions with bridge ends are relatively infrequent, but they are often severe. Such crashes usually occur when the width of a bridge is less than that of the approaching traveling lanes and shoulders. As a result, vehicles strike the ends of bridges, guardrails, curbing, or vehicles traveling in the opposite direction.*
> ***Intersections:*** *We've all experienced dangerous intersections with confusing turn lanes, blind spots, or lack of appropriate or inadequate signage or traffic signals. Obstructions, including vegetation, can block a driver's view of signs, signals, and other traffic control devices.*
> ***Roadway design limitations:*** *The safety of many local roads is limited because they were built to serve fewer cars traveling at slower speeds. Because of the explosion in vehicle miles traveled over the past 30 years, many of these roads are now high-speed commuter corridors. Their safety is compromised by hazards such as sharp curves, poor signs and markings, and lack of medians to separate oncoming traffic. Fatality rates on these roads can be five times as high as on the heavily traveled and high-speed Interstate system. Local governments, which are responsible for over 75% of our entire road network, target their limited resources to fix the most serious problems first. Drivers must therefore be aware of roadway hazards and drive with extra care.*
> ***Roadway access problems:*** *We're all familiar with the roadway access conditions that can cause driver confusion/frustration, such as driveways, roadways into new developments/businesses, and blind entrances. In such situations, drivers must remain alert to changing traffic patterns that require quick reactions.*
> ***Pedestrian and bicycle traffic:*** *Bicycle and pedestrian traffic must be accommodated and speeds must be controlled. There were 5,220 pedestrian deaths and 69,000 injuries during 1998, and these numbers are expected to increase as our population ages. By 2030, one in five Americans will be over age 65. Pedestrians over 70 constitute approximately 9% of the population, but they account for 17% of the fatalities. In 1998, 761 bicyclists were killed and an additional 53,000 were injured in traffic crashes.*

Pavement Preservation

Pavement preservation is identified as first priority in 23 CFR 450.316 (a) (1) "preservation of existing transportation facilities and, where practical, ways to meet transportation needs by using existing transportation facilities more efficiently;"

In the past 15 years, Oahu's 3,477 lane miles has received scant attention except for quick fixes of filling in potholes.

1989 – 1998: Roadwork decreased from a high of 319 lane miles per year to 45 lane miles in FY 1998.

2001 – 2004: the number of lane miles resurfaced declined by 52%, from 128 to 61, according to the audit.

Despite this buildup of deferred maintenance, is the city's current plan to lay asphalt 3/4ths to one-inch thick enough to address the problem?

Road ruin linked to beach activities, HSB, Jun 22, 05
http://starbulletin.com/2005/06/22/news/story1.html

> ***Pavement Preservation*** *is "a program employing a network level, long-term strategy that enhances pavement performance by using an integrated, cost-effective set of practices that extend pavement life, improve safety and meet motorist expectations." Source: FHWA Pavement Preservation Expert Task Group*
> ***Preventive Maintenance*** *is "a planned strategy of cost-effective treatments to an existing roadway system and its appurtenances that preserves the system, retards future deterioration, and maintains or improves the functional condition of the system (without significantly increasing the structural capacity)." Source: AASHTO Standing Committee on Highways, 1997*
> ***Pavement Rehabilitation*** *consists of "structural enhancements that extend the service life of an existing pavement and/or improve its load carrying capacity. Rehabilitation techniques include restoration treatments and structural overlays." Source: AASHTO Highway Subcommittee on Maintenance*

ORTP 2030 and the Scoping document to which we hereby comment, fail to address the immediate and long term purpose, needs and costs for our transportation system to be safe and efficient for the movement of people and goods on Oahu. OMPO, FTA and the city give inordinate priority and attention to commuter transit (even though transit accounts for less than five percent of total travel — and transit service can be significantly enhanced by an elevated reversible HOTway). Before you entertain further a high cost rail megaproject, we urge the city and OMPO to take care of important business first: #1 - traffic safety, #2 - good roads and more roads, #3 - traffic relief.

Respectfully submitted,
Dale Evans, President & CEO
Charley's Taxi

TP8/06201081

March 20, 2007

The Honolulu High-Capacity Transit Corridor Project
Department of Transportation Services
City and County of Honolulu
650 South King St., 3rd floor
Honolulu, HI 96813

Sir;

In response to your request for comments at the scoping meetings:

My name is Reg white. I am vice president, project development, for Paradise Cruise, Ltd. We have 463 employees who must make it to work and back each day, as well as all of the suppliers who rely on the proper flow of traffic on our streets to make our required deliveries of supplies and passengers each day within a reasonable time frame. Remember that with regard to deliveries, be they passengers or goods, the cost of such service must remain relative to the time required to complete the operation, and stalled traffic is therefore very expensive to all of Oahu's businesses and residents.

All statistics show that well in excess of 90% of us drive our cars to wherever we need to travel throughout the day. This means that any project undertaken with taxpayer monies must be of a worthwhile service to at least 90% of us. That doesn't mean that we all have to ride the transit to make this work, but it does mean that for whatever funds you are going to spend on transit, it must reduce traffic jams and increase traffic flow for the 90% of us who are on the roads in our cars or you have no right to spend our money for your project. This is what your EIS must resolve. Number one question to be answered is: Does this project reduce traffic congestion and provide efficient and smooth traffic flow on our adjacent roadways because of the transit system that is to be built? If the answer is not a resounding "Yes!" then you have no just cause to spend our money on the project. And please be clear, the money comes from us, whether it's C & C money, state money, or federal funds, it's all the same, the taxes are paid by we the people, and over 90% of us drive where ever we must go, when we must go there, in our cars, and we will not use transit instead, it simply does not fit our needs. The answer required here is "do whatever it takes to smooth and expedite the flow of traffic on our roads". This is the only problem to be solved. Unfortunately, neither of the three proposed alternatives will solve this problem, so you will have to look elsewhere. Remember, when the highway traffic moves efficiently, so does "The Bus", and then we all get what we paid for!

Sincerely,

For Paradise Cruise, Ltd.

Reg White
1540 S. King St.
Honolulu, HI 96826-1919
(808) 222-9794
E-mail RawcoHI@cs.com

Tp 3/07-201084

PHT, Inc. dba
Polynesian Hospitality

March 22, 2007

DTS
TRANS PLANNING
MAR 23 3 51 PM '07

The Honolulu High-Capacity Transit Corridor Project
Department of Transportation Services
City and County of Honolulu
650 South King St., 3rd floor
Honolulu, HI 96813

Whoever is in charge;

In response to your request for comments at the scoping meetings:

My name is Lawson Teshima, secretary-treasurer, for PHT, Inc. a tour bus operator.

Unfortunately, neither of the three proposed alternatives will solve the congestion problem, so you will have to look elsewhere.
We rely on the proper flow of traffic on our streets to make take our passengers each day to their destination within a reasonable time frame. Stalled traffic is very expensive to our business as well as all of Oahu's businesses and residents.

All statistics show that well in excess of 95% of us drive our cars to wherever we need to travel throughout the day. This means that any project undertaken with taxpayer monies must be of a worthwhile service to at least 95% of us. That doesn't mean that we all have to ride the transit to make this work, but it does mean that for whatever funds you are going to spend on transit, it must reduce traffic jams and increase traffic flow for the 95% of us who are on the roads in our cars or on our buses. You have no right to spend our money for your project if it does not significantly reduce traffic congestion and provide efficient and smooth traffic flow on our adjacent roadways because of the transit system that is to be built?

Since 95% of us drive where ever we must go, when we must go there, in our cars, and we will not use transit instead, it simply does not fit our needs. The answer required here is "do whatever it takes to smooth and expedite the flow of traffic on our roads". <u>This is the only problem to be solved.</u>

Sincerely,
For PHT, Inc. dba Polynesian Hospitality

Lawson Teshima
Secretary-Treasurer

650 Iwilei Road, Suite 415 • Honolulu, Hawaii 96817 • Phone (808) 524-5040 Fax (808) 524-4194

Appendix A-4: Public NEPA Scoping Comments

-----Original Message-----
From: Mattice <lesm@hawaiiantel.net>
To: Kaku, Melvin N <mkaku@honolulu.gov>
CC: donnaTurchie@fta.dot.gov <donnaTurchie@fta.dot.gov>
Sent: Sun Apr 15 20:22:02 2007
Subject: scoping process

Melvin Kaku
Director,Department of Transportation Services
City and County of Honolulu
650 South King Street
Honolulu, HI

Dear Mr. Kaku,

I would like to take this opportunity to respond to the City's scoping process in which the City is to explain the transportation alternatives and receive public comments.

We have heard many times from the Mayor and the City that the only thing to consider is the train. Now we learn that the train will run elevated down our waterfront. We also learn that there will be a five story high station in front of Aloha Tower.

As a ka'ma'aina, the prospect of the proposed visual blight along our waterfront, which I believe all of us want protected, is an unconscionable proposal.

Relieving congestion should be our chief concern and the train will not do that. Please study real alternatives such as traffic light coordination, staggered school hours and managed lanes from east Honolulu, and come back to the people.

To say that there is only one alternative is insulting!

Very truly yours,

Leslie Mattice

From: Bobbie Slater
To: Melvin N Kaku
Cc: Donna Turchie
Sent: Apr 13, 2007 5:34 PM
Subject: rrs_kaku1

April 13, 2007

Mr. Melvin Kaku
Director, Dept of Transportation Services City and County of Honolulu Honolulu, Hawaii 96813

Dear Mr. Kaku,
I am opposed to the rail proposal and feel that the City and OMPO have not been truthful with the public for the following reasons.
It was not necessary to start collection of the tax before a plan was in place. The public was led to believe that the FTA required the collection, which is patently a lie. The FTA only requires a designation of a future tax or revenue source.
The City never dealt with the burden of this additional tax. Hawaii's General Excise tax is the most regressive the country. At no point did the City or OMPO address the economic consequences of this tax. We already have the second highest homeless problem in the country. Obviously this will exacerbate the problem.
The Mayor has admitted that this is not enough money to finish the project, but neither the City nor OMPO have ever explained to the public where the rest of the money will come from. Obviously it will come from taxes. Again the poor and elderly will be hurt the most. Not to address this in an open manner was blatantly dishonest.
The City and OMPO have not reached out to the public to show what this train and the stations along the line will look like. One can only assume that their reasoning is that the visual blight would cause alarm.
Other communities that will be affected by the train have not been told about their particular circumstances. For, example, Manoa has not been told that the train will run over the freeway, becoming one of the most egregious environmental blights around.
The City and OMPO have never told the public that there is nothing sustainable about rail. The public has been led to believe that it will save energy, with out ever addressing the energy coast to construct the train, let alone to run it.
The City and OMPO have not been open with the fact that their own data show that traffic will be far worse in the future with rail than it is today.
Neither City nor OMPO have ever reached out to the public to explain the impacts of building an elevated, heavy and noisy train along our waterfront. They have never reached out to the public to tell us that they will block our view of the waterfront that we have always maintained we would protect.
We have asked for responses to these questions and do not get appropriate answers.
The League of Women Voters tried to get a televised discussion between train supporters and opponents and our largest television station was willing to air the show on prime time. Neither your staff nor anyone in the Administration would agree to take part. The City and OMPO are apparently unwilling to meet with opponents in an open, public format.
Hopefully the City and OMPO will give me answers to these concerns and we can then start having an open, public dialog on this the biggest and most expensive public works project in our history.

Very truly yours,

Rosalie Slater

From: ncbleecker@mac.com
To: Melvin N Kaku
Sent: Apr 13, 2007 9:34 PM
Subject: Rail Transit

Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd floor
Honolulu, HI 96813

Dear Sirs,

My comments regarding the ill-conceived plan to build a fixed rail transit in Honolulu are hereby offered, although it seems clear to this taxpayer that the City had long ago made up it's mind about the project and alternate options were never going to be even considered. This project is designed for the profit of the land owners along its route and those contractors who will be chosen to build it, and the politicians who are ramming it through on their behalf. It's effect on traffic congestion will be negligible at best. The cost, for building it and for its operation into the infinite future will be a huge burden on all taxpayers of the island, even though it will only be available to serve a small proportion of the populace. Most of the people who want to see the train built want it in hopes that other people will use it so that they can have the highways to themselves. How many people are going to drive down from the valleys, pay to park their car in a lot near the station, pay to ride the rail for a few miles as it stops frequently along the way, then disembark and take a bus to where they need to go?

If you doubt that this project it dictated by the wishes of certain politically powerful constituencies consider the route selected recently for it by the City Council. That it would not go to the University of Hawaii at Manoa or the Airport is ludicrous. Obviously the taxi and bus companies that service the Airport would not wish to have their lucrative concessions there threatened. Their influence is what really counts with the politicians, not the true needs of the population at large.

If the true intent was to do something to reduce traffic congestion on the freeway then HOT lanes and a vastly improved bus circuit would be the best, and most economical solution, but that is not even being considered by the City.

Sincerely,
N.C.Bleecker

Friday, April 13, 2007

Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813
Via Email

Subject: **Environmental Impact Public Scoping Comments**
Relating to the Honolulu Transit Corridor Project

To Whom It May Concern:

Thank you for providing this opportunity for public comment on the "Honolulu Transit Corridor Project" proposed by the City and County of Honolulu. The following comments are provided because it has become evident that the presently proposed elevated transit guideway is, in some significant aspects, contrary to the public interest.

Background

As the result of often insufficient, inaccurate and distorted information provided by the City administration's transportation department and their hired consultants, the City Council has proceeded in an unnecessarily awkward and chaotic manner during deliberations over a route alignment and technology for a proposed public rapid mass transit system. Fortunately, the City Council has stopped short of a technological definition of this system other than "fixed guideway system," so that it may be eligible for a fractional federal funding share of the cost. In view of this compounded conundrum, it has become abundantly clear that the federally required comprehensive Environmental Impact Statement process must be completed with full public review before any further steps are taken.

The concerned public, however, has been somewhat enlightened by certain disclosures that an elevated rail system, i.e. *heavy rail* system, as strongly promoted by the City administration, development interests, concrete providers, and hired consultants, will be anything but "rapid" at 25 miles-per-hour between stops, and will do nothing to relieve the present LOS F traffic congestion and diminish traffic effectively. But the tangible costs of such a proposed system remain obscured by a false ceiling that conceals the true future fiscal burden to be strapped on the backs of unknowing taxpayers, who presently face escalating replacement and repairs of century-old water, sewer and roadbed infrastructure, which together now portend a bankrupting of the City and County of Honolulu. In light of this, the Little Train That Can't appears at best to be a frivolous fantasy cast upon the masses who will become indebted by this scheme for a generation or more.

Fatal Flaw

Apart from such socio-economic impacts, there is another serious impact that also merits full exposure. This significant impact is the potential irreparable blight of the proposed elevated guideway slamming through the vital heart of the Downtown Honolulu Waterfront and beyond. It is most curious that this significant impact was utterly and completely ignored in the proposed project's "Environmental Consequences: Supporting Information" report, as offered by the City administration's hired consultants at the end of October, 2006.

The fatal flaw in the Environmental Consequences report is the total absence of mention of the four (4) significant historic sites along the proposed Waterfront route. These protected sites, specifically Aloha Tower, Irwin Park, the Dillingham Transportation Building, and Mother Waldron Park are listed respectively on the National Register of Historic Places and the Hawaii Register of Historic Places, as attached. Astonishingly, although all visually and physically impacted historic sites were to be legally considered in this required report, there is no reference to these significant historic sites and the consequent potential impacts on them by the proposed project.

The Environmental Consequences report states the following on page 60: "In regard to historic resources, this project must comply with Section 106 of the National Historic Preservation Act of 1966 (NHPA) and Section 4(f) of the Department of Transportation Act of 1966 because of the federal participation in the project." However, the report completely ignores Aloha Tower, Irwin Park and the Dillingham Transportation Building in listing the "historic and culturally sensitive areas of Downtown" on page 62, and brazenly states on page 62-63 that the "Nimitz Highway/Halekauwila Street/Kapiolani Boulevard Alignment would have the least impact on cultural resources..." Thus this required report is biased and fatally flawed because it avoids addressing the significant long-term environmental impacts of the presently-proposed elevated route alignment on Aloha Tower, Irwin Park, and the Dillingham Transportation Building along the Downtown Waterfront, and Mother Waldron Park along Halekauwila Street - all registered historic sites.

Specifically, such elevated infrastructure blight is "visually incompatible and blocks the view of a historic resource (e.g., the scale of the infrastructure would overwhelm the resource's historic appearance)" and causes the "loss of integrity of setting, feeling and association" (see pages 63-4). The historic view planes to the Harbor from Bishop Street and the Chinatown Historic District will be similarly impacted. It therefore would be a fatal mistake for Honolulu's future if the City forces the intrusion of elevated transit blight on the Honolulu Waterfront and the *mauka-makai* harbor views. One only needs to consider the blight created by the Embarcadero Freeway along the San Francisco Waterfront, and the universal public elation when it was torn down. It is time that the City and County of Honolulu learns by the mistakes of others before it is too late.

The attached rendering produced by the Hawaii Chapter of the American Institute of Architects illustrates the significant impact of the proposed elevated transit guideway along the Honolulu Waterfront. Verification of such a significant negative impact is provided by the Aloha Tower station video simulation on the City's own www.honolulutransit.com web site. Aloha Tower and Irwin Park are to the left of the rendering, and the elevated transit guideway's immediate proximity to these sites is also briefly visible on the City's video, as is the red-tile-roofed Dillingham Transportation Building immediately adjacent to the elevated guideway on the left side heading east toward Kaka`ako. Together these depictions clearly illustrate that if the Downtown Honolulu Waterfront is allowed to be impacted by the fatal mistake of elevated guideway infrastructure, the vital visual character and integrity of the waterfront centerpiece of Downtown and harbor entrance to Honolulu will be lost.

Further, the Honolulu waterfront and the adjacent Kaka`ako area are both under State jurisdiction, and through State agency and community advisory partnerships these areas are being carefully improved. A new centerpiece park is proposed to extend from historic Irwin Park along the Downtown Honolulu Waterfront, and in addition to historic Mother Waldron park two additional park areas are planned along Halekauwila Street at Punchbowl Street and Ward Avenue. In addition, the Kaka`ako Mauka master plan designates Halekauwila Street and its extension to Kamake`e Street as a significant "promenade" street, a pedestrian-friendly boulevard with wide tree-lined sidewalks and new human-scale residential neighborhoods. Thus, the proposed elevated transit infrastructure blight would be tragically misplaced on Halekauwila Street as well.

Conclusion

In conclusion, there are very serious concerns surrounding the City's disregard and neglect of the significant negative impacts of an elevated transit route along the Honolulu Waterfront specific to the complex of registered historic sites that include Aloha Tower, Irwin Park and the Dillingham Transportation Building, and Mother Waldron Park along Halekauwila Street. This badly-planned project cannot be allowed to overshadow and overpower these significant historic sites or destroy the visual character and integrity of the vital Downtown Waterfront.

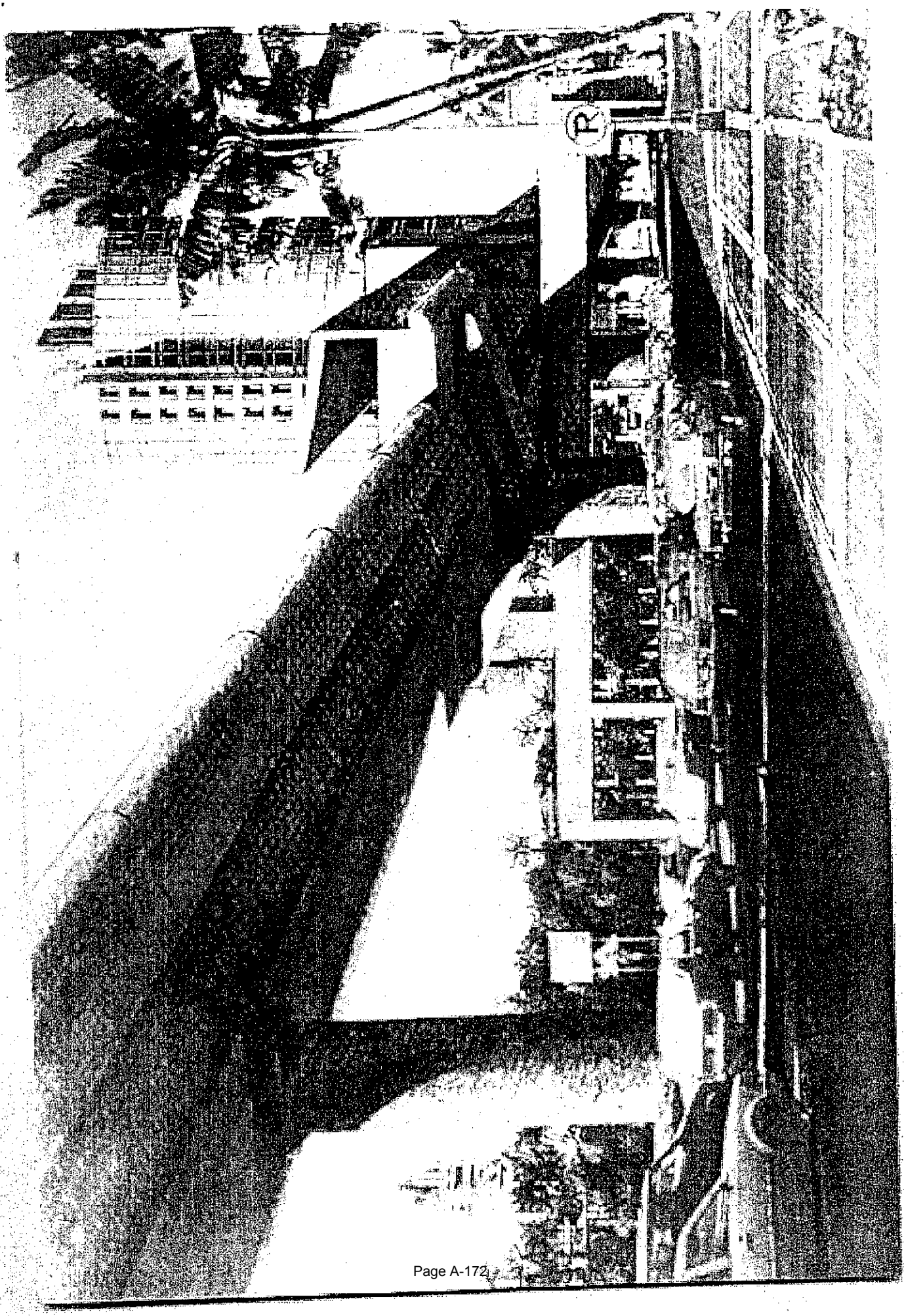
Sincerely,

Michelle S. Matson
Michelle S. Matson

National and State Register of Historic Places

http://www.hawaii.gov/dlnr/hpd/register/regoahu.pdf

Site Number	Site Name	Tax Map Key	Hawaii Register	National Register
80-14-9929	Aloha Tower	2-1-01:13	1/29/81	5/13/76
80-14-9829	Irwin Memorial Park	2-1-13:07	12/4/99	
80-14-9900	Dillingham Transportation Building	2-1-14:03		9/7/79
80-14-1388	Mother Waldron Playground	2-1-51:05	6/9/88	



-----Original Message-----
From: garry p smith <garrypsmith@juno.com>
To: Kaku, Melvin N <mkaku@honolulu.gov>
Sent: Tue Apr 10 14:17:03 2007
Subject: Testimony for scoping

Garry P. Smith
CDR. USN (Ret.)
91-321 Pupu Place
Ewa Beach, Hi 96706
689-5559
392-5559
April 10, 2007
Written comments on scoping to be filed with the city and forwarded to Federal Transportation Authority The process involving the selection of the most preferred alternative that resulted in the selection of a fixed guide way was flawed due to not involving the affected public in the decision making and by a conflict of interest from our area State Senator.
Meetings were held in Kapolei on several occasions to determine the public's input on the type of system desired but at no time were any public meetings held in Ewa/Ewa Beach the area most affected by any change in a transportation system. Ewa/Ewa Beach has over 40,000 residents, much more than Kapolei and is projected to increase to over 70,000 residents by the opening date of the fixed guide way in 2018, more residents than in Kapolei. Holding the meetings exclusively in Kapolei ensured the city that the turnout would be overall in favor of a fixed guide way as the residents of Kapolei as represented by their neighborhood board and CAC see any city transportation changes to their benefit regardless of the benefit to other perhaps even more needy residents of outlying communities.
At no time did the Ewa Neighborhood Board, Citizens Advisory Committee (CAC) appointee, Gary Bautista, hold separate committee meetings concerning the alternatives being considered by the city nor did he provide any presentation or testimony to the neighborhood board as to a community input he had or did not have.
Senator Willie Espero, our Ewa Beach district Senator and an appointee to Oahu Metropolitan Policy Organization at no time held a meeting of the public to discuss the alternatives being presented by the city.
Additionally, he was hired by developer D.R. Horton in 2006 just after the announcement by the city of the proposed route of the fixed guide way. D.R. Horton plans on building 11,700 homes in a project called Ho'opili a vacant area that is scheduled to receive one of the fixed guide way stations. The success or failure of this project hinges on the building of a fixed guide way and a station through the project by the city. Sen. Espero in March 2007 publicly announced that he plans to vote at OMPO for the fixed guide way system and expects it will have enough votes to easily pass, this prior to any input from the CAC to which he is supposed to use as an advisory BEFORE he makes his decision.
Given the lack of input requested from a very large community (Ewa/Ewa Beach) directly affected by the transportation system selected by the city I believe the system to be fatally flawed and should be disallowed.
Due to an obvious conflict of interest from our State Senator Espero and his decision making process without waiting for proper public input through the CAC I similarly believe CAC and OMPO are making policy with outside influences and not from the public and should be disallowed.
/s/ Garry P. Smith

-----Original Message-----
From: JamesJKO@cs.com <JamesJKO@cs.com>
To: Donna.Turchie@fta.dot.gov <Donna.Turchie@fta.dot.gov>
CC: Kaku, Melvin N <mkaku@honolulu.gov>
Sent: Thu Apr 12 23:18:20 2007
Subject: Honolulu Mayor pushes for Rail

I attended a neighborhood meeting at Mililani just before Thanksgiving 2006.It started with a 20 min clip featuring the Mayor telling how wonderful rail is.Later, there was this staged question-answer dialog between one pro-rail city councilman & a rep from Parson Brinckerhoff-again telling how good rail is.The bulk of meeting was testimonies from about 15 people on whether they are for against rail (nothing scientific). This went on till about 9:15 pm (almost 3 hrs) at which time people wanted to use the restroom or go home. It was open to questions at the end and I had a few questions but since everyone was anxious to leave I didn't get to ask them-my wife and I felt it was a rigged event. There was no discussion about the "Managed Lanes Alternative".

-----Original Message-----
From: Bronwen Welch <bronwen2@hawaii.rr.com>
To: Kaku, Melvin N <mkaku@honolulu.gov>
CC: DonnaTurchie@fta.gov <DonnaTurchie@fta.gov>
Sent: Thu Apr 12 21:19:23 2007
Subject: Honolulu Rail proposal

Dear Sirs:
I have been a resident of Honolulu for 58 years and have witnessed the incredible increase in traffic congestion. I am very concerned that there was no opportunity for the general public to voice their opinion on possible traffic solutions. The City has said that Rail will NOT reduce traffic congestion.
WE NEED A SYSTEM WHICH WILL REDUCE TRAFFIC CONGESTION FROM CURRENT LEVELS!!!!!!!
The public is being misled and will end up having to pay for a fiasco. How can we be heard?????
Thank you,
Bronwen L. Welch

-----Original Message-----
From: Marijane <marijane@mac.com>
To: Kaku, Melvin N <mkaku@honolulu.gov>
CC: Donna.Turchie@fta.do.gov <Donna.Turchie@fta.do.gov>; Kobayashi, Ann H. <akobayashi@honolulu.gov>
Sent: Wed Apr 11 10:28:54 2007
Subject: Re: Transit Scoping

I would like to comment on the scoping process done by the City on Mass Transit:

I attended one of the meetings held by the Mayor and it was a farce!
There were placards all around the room showing the 4 choices, but the people who were supposed to tell you what each option included were woefully uninformed.
The Mayor took all the floor time to push HIS RAIL, and got upset with anyone who questioned his figures as to cost and rider ship! Actually scolded one man for having attended a previous meeting and being opposed to Rail.
I was unable to get an answer to my question about elevators to get wheelchair people up to the platforms. Heaven only knows how many others may have had a question but were afraid to incur the Mayor's displeasure by asking.

I also attended a seminar on the fixed guideway/managed lanes alternative, with very knowledgeable speakers, who DID have facts and figures, with comparisons to Tampa, Fla, which is a city with approximately the same population as Honolulu. The Rail advocates have all but called them liars, removing "Hot Lanes" from the original 4 choices.

This whole process has been a railroad to everlasting debt! The City Council were forced by time restrictions to make decisions without all the facts, let alone figures!

How can a fair Scoping Process be made when one side is brow beating anyone questioning the validity of the Mayor's choice, and the alternative methods are totally ignored, or worse yet.... misrepresented by prejudiced "docents"?
Is it any wonder the majority of our population don't VOTE, and choose not to "get involved" in political issues?

Marijane Holmes Carlos
620 Mc Cully St. #901
Honolulu, Hi 96826
941-1853

TPD-

10Apr20072001 3:47

From: Suzanne Teller <suzantell@earthlink.net>
Cc: <donna.turchie@fta.dot.gov>
Bcc: Suzanne Teller <suzantell@earthlink.net>
Date: 10April20072001 3:47
Subject: scoping process

Dept. of Transportation Services
C & C Honolulu
650 So. King Street, 3rd floor
Honolulu 96813 HI
Attention: Honolulu High Capacity Transit Project

Dear Sirs:
As a Senior Citizen living on social security, I am horrified at the tax increase to pay for the rail, and I understand that this will not be enough money down the road. I have been waiting to see what proposals there are for the rest of the costs, but there has been no information. If I could afford to pack up and leave now, I would do so. I'm sure many others feel the same.

I understand that another proposal, managed lanes, has been dropped from consideration because of expense. Isn't it a simple highway? How can it cost so much? We have not been able to see any information on why this alternative is so expensive. There haven't been any reasonable explanations on any of the alternatives.

This process is shafting the senior citizens, and all people of lower incomes. And the City is not being forthright with us, the tax-paying public.

Now that the EPA is demanding a secondary sewage treatment plant be built, better that be the priority ($1 billion ?) as well as the antiquated sewer system or we'll all be in deep doo-doo.

A concerned resident,
Mrs. Suzanne Teller

cc: FTA's Region IX, Donna turchie

Suzanne Teller

Mrs. S. Teller
Apt. 15:0
1541 Kalakaua Ave.
Honolulu, HI 96826-2406

RECEIVED
07 APR 13 A8:34

-----Original Message-----
From: Pegge Hopper <peggeh@lava.net>
To: Kaku, Melvin N <mkaku@honolulu.gov>
CC: 'Donna Turchie' <Donna.Turchie@fta.dot.gov>
Sent: Tue Apr 10 16:00:50 2007
Subject: Rail

To whom it may concern,

I have been a gallery owner in downtown Honolulu for 24 years. The first 20 years were very difficult as Downtown/Chinatown had a reputation for drugs, and unsavory situations.

For years, storeowners in this area have persevered to change the character of this historic district. About 4 years ago we started First Friday, one night a month when all the galleries would be open to the public. We provided food, music and whatever we could to get the public to come here and make this a thriving center for culture and the arts.

Just within the last year we have seen results as more and more people come here, and more shops, restaurants and galleries have opened.

Now, we learn that the Mayor's train will run, elevated, along the foot of Nuuanu Street — on the waterfront. It will be a true eyesore and the 70+ decibels will be a huge distraction.

No one told us there would be a huge five-story station across from historic Aloha Tower. No one came to discuss this with any of the organizations I belong to, or that have been involved in our revitalization effort.

After all of our hard work, cost and perseverance, all will be lost when this train ruins the character of our little community. Had the City bothered to tell us these things we would have packed up years ago rather than work so hard to attract people here.

They tell us that there are no alternatives to discuss other than doing nothing. This is a sham and an insult to our intelligence.

One of the solutions I strongly support is MANDATORY SCHOOL BUSING. When school is not in session traffic is cut in half. It doesn't take a genius to figure out that perhaps 50% of A.M. traffic consists of parents driving kids to school!

Pegge Hopper

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From: Pegge Hopper <peggeh@lava.net>
To: Kaku, Melvin N <mkaku@honolulu.gov>
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Pegge Hopper

UNIVERSITY OF HAWAI'I AT MĀNOA

Department of Civil and Environmental Engineering
2540 Dole Street, Holmes Hall 383, Honolulu, Hawai'i 96822-2382
Telephone: (808) 956-7550, Facsimile: (808) 956-5014

March 9, 2007

Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813
Attn: Honolulu High-Capacity Transit Corridor Project
VIA email: mkaku@honolulu.gov

Dear Mr. Kaku:

As my comments on the Scoping Information Package of March 15, 2007, I attach my Report to the Honolulu City Council Transit Advisory Task Force dated December 1, 2006.

In my opinion, the most egregious violation of FTA's rules on alternative specification and analysis was the deliberate under-engineering of the Managed Lanes (ML) Alternative to a degree that brings ridicule to prevailing planning and engineering principles. For example, FTA guideline 2.4 item 2 states that
"Each alternative should be defined to optimize its performance."
[Source: http://www.fta.dot.gov/documents/Definitions_of_Alternatives.pdf]
The exact opposite was done. The Honolulu City Council did not reject a HOT expressway with express buses; the City Council rejected an alternative that was engineered to fail, and, it did fail by design. Therefore, the ML alternative must be correctly specified and fully assessed in the upcoming environmental assessment process.

Sincerely,

Panos Prevedouros, Ph.D.
Professor of Transportation Engineering

cc: Ms. Donna Turchie
Federal Transit Administration, Region IX
201 Mission Street, Room 1650
San Francisco, CA 94105
VIA email: Donna.Turchie@fta.dot.gov

HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT:

ALTERNATIVES ANALYSIS (AA) REPORT - Report to Transit Task Force

Panos D. Prevedouros, Ph.D.
Member, Honolulu Transit Task Force, and Professor of Transportation Engineering,
Department of Civil and Environmental Engineering, University of Hawaii at Manoa

This paper reviews the Alternatives Analysis report from an engineering perspective. In general, its organization tracks the organization of the report.

→ Page S-2: "Motorists experience substantial traffic congestion..." The report relies heavily on anecdotal experience of traffic congestion. It would benefit from a quantitative presentation of congestion data for major origin-destination pairs. This would allow for comparison of Honolulu's congestion to other cities. Data from the State's Congestion Management System should be cited and tabulated.

→ Page 1-1: The statements of purpose

- "improved mobility"
- "provide faster, more reliable public transportation services"
- "provide an alternative to private automobile travel"

make it clear that this is a public transit analysis - not a more comprehensive analysis of transportation issues in the subject corridor . In particular, the effects of the alternatives on freight transportation in the corridor are not considered, even though the alternatives will plainly impact freight. This Alternatives Analysis does not respond directly to the need to reduce traffic congestion on Oahu.

→ Page 1-1: Bottom: "Current a.m. peak period times for motorists from West Oahu to Downtown average between 45 and 81 minutes. By 2030, after including all of the planned roadway improvements in the ORTP, this travel time is projected to increase to between 53 and 83 minutes."

From this description, travel time will be relatively stable for 25 years into the future (45 minutes to 53 minutes , 81 minutes to 83 minutes, on average, provided the ORTP roadway improvements are implemented). .Question whether this level of inconvenience is severe enough to justify a fixed guideway project of the magnitude proposed in the Alternatives Analysis, in addition to the cost of the base improvements called for in the ORTP.

→ Page 1-9: The UH-Manoa campus is not identified here as a major public transit destination, notwithstanding the data presented on page 1-4 (20,000 students, 6,000 staff; 60% of students must drive or use transit to attend classes). If it is not a major transit destination, why is rail service to the UHM being considered?

Page 1-13, Table 1-1: The vehicle speed projection data presented here are not consistent with engineering observations. Once a street segment becomes saturated with traffic, such as the "Liliha Street" segment on the H-1 freeway, the average speed of vehicles on that segment tends to stabilize at about 15 mph. Therefore, the estimated average speed drop from 19 to 12 mph on

the Liliha segment is unlikely. Rather, increased traffic will be experienced as longer periods of traffic congestion. The planning model does not seem to be able to model saturated traffic conditions correctly. This can affect speed estimates for congested roadways, and result in inaccurate travel time forecasts.

→ ♦ Page 2-3: Bus fleet size estimated for the Managed Lane alternative is overstated, and is not consistent with national experience. Buses run 10 miles in approximately 10 minutes on HOT lanes. As a result of improved bus efficiency, either fleet size is reduced, or a given fleet size can provide a much higher service frequency.

→ Page 2-16: It is not clear from the Operating and Maintenance cost estimates presented here whether replacement costs for the rolling stock and the multitude of deteriorating pieces of equipment (switches, generators, signals, computer controls, extensive wiring and power system, etc.) of the Rail option have been included in projections of annual O&M costs. Text at pages 3-9 and 3-10 do not answer this question.

→ Page 3-2: Table 3-1: Significant trip growth is projected in two out of 25 Traffic Analysis Areas on Oahu. Specifically:

Area 11 is Honouliuli and Ewa Beach — 2005 total daily trips are 176,000
2030 total daily trips forecast at 342,000
This is an increase of 166,000 total daily trips.

Area 12 is Kapolei, Ko'Olina, Kalaeloa — 2005 total daily trips are 122,000
2030 total daily trips forecast at 362,000
This is an increase of 240,000 total daily trips.

Trip generation for these two areas will change from 298,000 trips in 2005 to 704,000 trips in 2030, a growth of 136% in 25 years. These estimates are questionable, given Oahu's population growth of 4.8% between 1990 and 2000, the annual growth in tourism of only 0.6% per annum since 1990, continued reduction in agriculture, stability in military operations and reduced travel as baby boomers retire and draw a pension instead of going to work.

For order-of-magnitude purposes, this 704,000 transit trip projection for areas 11 and 12 should be compared with the Table 3-3 estimates for transit trips under any of the four fixed guideway alternatives – 281,900 to 294,100 – for entire Oahu. If trips in areas 11 and 12 grow by only half as much, by 68% in 25 years, then their 352,000 projected new trips would be close to the projected total number of transit trips on Oahu.

→ Page 3-4: Data in Table 3-3 in combination with Table 3-7 also provide useful order-of-magnitude comparisons:

- Year 2030 Transit trips in the "No Build" alternative are projected at 232,100.
- Year 2030 Transit trips with the Rail alternative most favorable to transit are projected at 294,100.
- Total gain in transit trips after a rail system is constructed: 62,000 transit trips.
- Year 2030 Vehicle trips are estimated at about 3,000,000 (at a 1.6 average occupancy including buses, this estimate represents 4,800,000 person trips).

- The 62,000 new transit trips reflect about 1% of person trips.

Baseline transit trip projections have been historically overstated by about 21%, as the table below indicates. The table shows actual *TheBus* trips versus forecasted *TheBus* trips in the "No Build." In other words, the base ridership in the No Build is inflated. Once the base is inflated, all transit ridership forecasts are inflated and justifiably uncertain.

Millions of *TheBus* Transit Trips per Year

Year	Actual	Forecast	Source	Difference	% Error
1990	75.6				
1991	72.8				
1992	73.0				
1993	75.6				
1994	77.3				
1995	72.7				
1996	68.9				
1997	68.6				
1998	71.8				
1999	66.2				
2000	66.6				
2001	70.4	73.0	*HART*		
2002	73.5	67.0	*Hali 2000*		
2003	69.1	88.0	*Rail 1992*		
2004	61.3	104.0	*BRT 2001*		
2005	67.4	96.0	*Rail 2006*		
Average	**70.7**	**85.6**		**14.9**	**21.1%**

From Table 3-3 it can be observed that in 2030 the number of transit trips for the No Build Alternative is 232,100, and that the number of transit trips in the best rail option is 294,100. If the Rail's trip estimate is overstated by 21%, then 294,100 become 232,339; these are about equal to the transit trips in the No Build. Thus, all of the gain in transit trips due to a rail system may be attributable to the inflated baseline forecasts.

→ ♦ Pages 3-7, 3-8: The TSM alternative is estimated to have a requirement for 6,200 parking stalls at various park-and-ride facilities, the Managed Lane alternative has the same requirement, but the 20-mile rail option is projected to require only 5700 parking stalls. A smaller parking requirement for rail compared to TSM and ML does not make sense. In the Rail alternative many riders who cannot walk to a station must drive and therefore have to park their vehicles somewhere. In the TSM and ML alternatives, the transit vehicles - buses - collect riders from their residential neighborhoods and deliver them to their destination, thereby arguably reducing the quantity of parking stalls required. This discrepancy should be clarified.

→ Page 3-11: Table 3-11 includes travel time estimates for year 2030 with Rail. Basically travel by auto is equal, faster or much faster than rail for all 2030 trips between:

- Aiea (Pearlridge) and Downtown
- Downtown and Ala Moana Center
- Downtown and Manoa

- Airport and Waikiki

For trips between Aiea and either Waikiki or Manoa, all Rail alternatives will provide trip times that are the same as or longer than trips by auto. The travel times by auto reflect 2030 traffic congestion conditions without rail.

→Page 3-13: The following excerpts from the performance assessment of the Managed Lane Alternative indicate that the ML alternative did not receive minimal engineering analysis support needed to develop solutions to obvious issues:

> "While bus speeds on the managed lanes are projected to be relatively high, the H-1 freeway leading up to the managed lanes is projected to become more congested when compared with the other alternatives, because cars accessing the managed lanes would increase traffic volumes in those areas."

Instead of providing new ramps from the H-1 and H-2 freeways and a ramp from Farrington Hwy. to feed the Managed Lane facility, an already congested freeway itself was used to feed the ML. The predictable result is both more congestion on H-1 freeway and underutilization of the ML.

> "Additionally, significant congestion is anticipated to occur where the managed lanes connect to Nimitz Highway at Pacific Street near Downtown."

This occurred because a (poor) choice was made to simply use the state's proposed Nimitz Viaduct (NV) project. However, NV was conceived as a shortcut between the Keehi Interchange and downtown and was never intended to serve new traffic from the Ewa plains to town. It can still be used, but it needs to be re-engineered to provide adequate off ramps to major trip destinations. The AA's ML is under-engineered in terms of off and on ramps by a magnitude of at least three (3). Three times as many ramps are needed and can be engineered. If this is done, the quote below will have no place in the AA.

> "Hence, much of the time saved on the managed lane itself would be negated by the time spent in congestion leading up to the managed lane as well as exiting the lanes at their Downtown terminus."

Based on substantial evidence of ML being under-engineered, its performance statistics of are not representative of what a new 2-lane reversible expressway can do for this corridor.

In addition, the critical function of the ML as an escape/evacuation resource (or special event, high demand reliever) was not analyzed. The ML can be designed with Aloha Stadium and H-3 freeway as its middle anchor. In off-peak times, weekends, special events and evacuations, the ML can run from Waikele to Aloha Stadium and H-3 freeway on its west half, and from Iwilei to Aloha Stadium and H-3 freeway on its east half. Also, if Windward Oahu evacuation or high demand should occur, then the ML can be dynamically configured so that the H-3 freeway discharges both toward Ewa and toward Honolulu. In short, the ML provides extensive regional traffic management possibilities, none of which were explored.

→ ♦ Page 3-20: Table 3-10 presents projections of "vehicle hours traveled," a concept that has no application to trips using transit. This table should be reformulated to show "person *hours* of travel," to make the comparisons consistent and relevant. Based on my calculations (see Appendix 1), when these data are so converted, then the hours spent traveling on Oahu with a 20-mile Rail line will be 11% longer than the No Build. All Rail alternatives will provide worse Oahu-wide person hours of travel compared to the car and bus No Build alternative. This is consistent with past experience in the U.S. where new rail systems have not reduced traffic congestion.

→ ♦ Page 3-25. The traffic estimates for the Managed Lane alternative presented in Tables 3-12 and 3-13 appear to be based on the assumption that a freeway lane may not carry more than 1,400 vehicles per hour in order for it to operate at a good level of service. This is simply not U.S. national experience for priced lanes. For example, Appendix 2 provides a multi-week, year 2006 sample of a three-lane cross-section of California's SR-91 Managed Lanes. They operate at free flow (about 60 miles per hour) while carrying a volume of more than 2,000 vehicles per hour per lane. There is no reason why this result would not apply to a two-lane Managed Lane facility on Oahu. Based on multiple research projects I have conducted for the State of Hawaii DOT, there are several 15-minute periods during which lanes on the H-1 freeway carry over 2,400 vehicles per hour (hourly equivalent), which attests to the ability of local motorists to drive at headways necessary to result to lane capacities in excess of 2,000 vehicles per hour.

The tables in Appendix 3 provide a sample of traffic analysis, the conclusion of which is that in 2030 and with a properly designed 3-lane Managed Lane expressway, traffic congestion on the H-1 freeway will be almost the same as in 2003 while still using the AA's growth forecasts. Congestion on H-1 freeway will be incomparably worse with any of the Rail options.

→ Page 3-27: "The travel demand forecasting model has been reviewed and updated for use on the project." Following are several common-sense observations on the forecasting model:

- Oahu has no rail service, so the existing OMPO model (done with survey data which are over one decade old) naturally has no local parameters for any type of rail service. What parameters were introduced to the model to represent rail?
- Is the model representative of today's conditions? Since the OMPO model was developed, *TheBus'* share of total trips has declined in the last 10+ years, fuel costs went up in the last 10+ years, Kapolei employment was non-existent 10+ years ago, the "bust" real estate market of the early 1990s is "booming" now, the H-3 freeway did not exist 10+ years ago, safety and security issues in metro rail systems (Tokyo, London, Madrid) did not exist, and last but not least, a huge portion of Oahu's population, the baby boomers, were not on the verge of retirement. Given these circumstances, it is at least questionable whether any model based on historical data can provide useful predictions over the Alternatives Analysis' planning horizon, 2005-2030.

All these trends affect the setting of parameters and alternative-specific constants in the model. Given all these concerns, how can a fundamentally old mode choice model with "imported" parameters give any reasonable predictions for year 2030? The model should be provided for review and its parameters should be justified.

→ Page 3-28: "External factors, such as a downturn in the economy, could affect whether the island will develop as planned." The AA's forecast is truly a best case scenario which is an unrealistic basis for multibillion dollar civil infrastructure development. Below is a partial list of possible events that would make vigorous growth unlikely. For these reasons as well as the problematic construction and operation deployment of all Rail alternatives it is essential that Risk Assessment Analysis is part of this AA (see last point in this review.)

- practically zero growth in tourism
- a sustained energy crisis will cause high airfares and a reduction in tourist arrivals
- the possibility that avian flu, SARS or similar will further threaten tourism
- the Waikiki tourism plant is old, crowded and revitalization is slow
- continued reduction in agriculture
- stability in military operations and post-Iraq military downsizing to repay the war debt
- baby boomers retiring in large numbers
- substantial loss of seniority in Hawaii's Congressional Delegation will cause a dramatic decrease in earmarked projects and funds for Hawaii

Any of these reasons can cause a substantial reduction in development or expansion which makes rail an alternative that is inferior even to the simple TSM alternative.

→ Page 3-30, Table 3-14: In this summary table, the use of percentages to indicate the magnitude of the Rail alternative's impacts exaggerate the actual effects, because the actual numbers involved are quite small (as the comments above have shown).

→ Page 4-1: The Rail alternative has the highest environmental impact and displacements. Also rail is not environmentally benign once it is built and put to use. The energy units (BTUs) to transport one person one mile from the Transportation Energy Data Book: Edition 25–2006 are:

Car	3,549 BTU
Personal Truck	4,008
Transit Bus	4,160
Rail Transit	3,228

Commuting in America III reports that 70% of the transit trips in the nation occur in the New York City metro area where subways run full or near-full for extended periods. In all cities with well utilized heavy rail systems, these rail systems are busy for about four out of 24 hours per day. Unlike cars and personal trucks that spend energy only when they operate, most rail systems run continuously and draw large amounts of energy for serving few riders. Oahu's rail energy consumption will be at least twice as high as the BTUs reported above. Rail is an inferior environmentally and energy dependency alternative for Oahu.

Two critical omissions of the Alternatives Analysis report are information on the cost of the alternatives per resident and taxpayer and the absence of any risk analysis. The latter, for example, is found in any multimillion dollar project involving private funds.

1. Some argue that financial impact analysis should have been done prior to approving the raise of the General Excise Tax from 4.00% to 4.50%. However, at that time the alleged costs were in the order of about two billion dollars with a quarter of that

coming from the FTA, leaving the local tax subsidy at $1.5 billion. The AA makes it clear that for the short, 20 mile rail system, the local contribution will be at least $3 billion. A breakdown of this cost per taxpayer and per capita is essential.

2. At a minimum, risk analysis should examine the implications of a partially finished product due to a severe economic downturn or other significant impediments. Travel demand and existing congestion levels dictate that the first useful segment of a future transit system should connect the airport with the Ala Moana Shopping Center. Managed Lanes can serve this (highest demand and congestion) segment because a large part of it is the state DOT's "Nimitz Viaduct" project which has received environmental approvals. However, one cannot operate a rail system without at least one expansive rail yard. The nearest appropriate space for a rail yard identified in the AA is next to the Leeward Community College. Therefore, with any rail alternative, the lowest demand segment must be constructed first, and if conditions do no allow for it, there is the risk of developing an ineffective piece of transit infrastructure connecting LCC to Aloha Stadium.

Appendix 1. Sample Estimations in Person-Hours of Travel

The travel estimates in Table 3-10 tell a different story than the one presented. Conveniently for the rail alternatives, the AA presents "vehicle hours traveled." By using this measure, those who travel on rail conveniently disappear from the travel time calculations as if they travel at warp speed. Far from it.

Let me take the "No Build" and "20-mile Rail" estimates of the AA to demonstrate the amount of time spent for transportation with and without rail using a statistic that truly matters: Person-hours.

The No Build vehicle hours estimate is 395,000 and assuming an average vehicle occupancy of 1.6 people per vehicle (includes buses), then the 2030 estimate is:

No Build Person Hours = 395,000/1.6 = *246,875* (1)

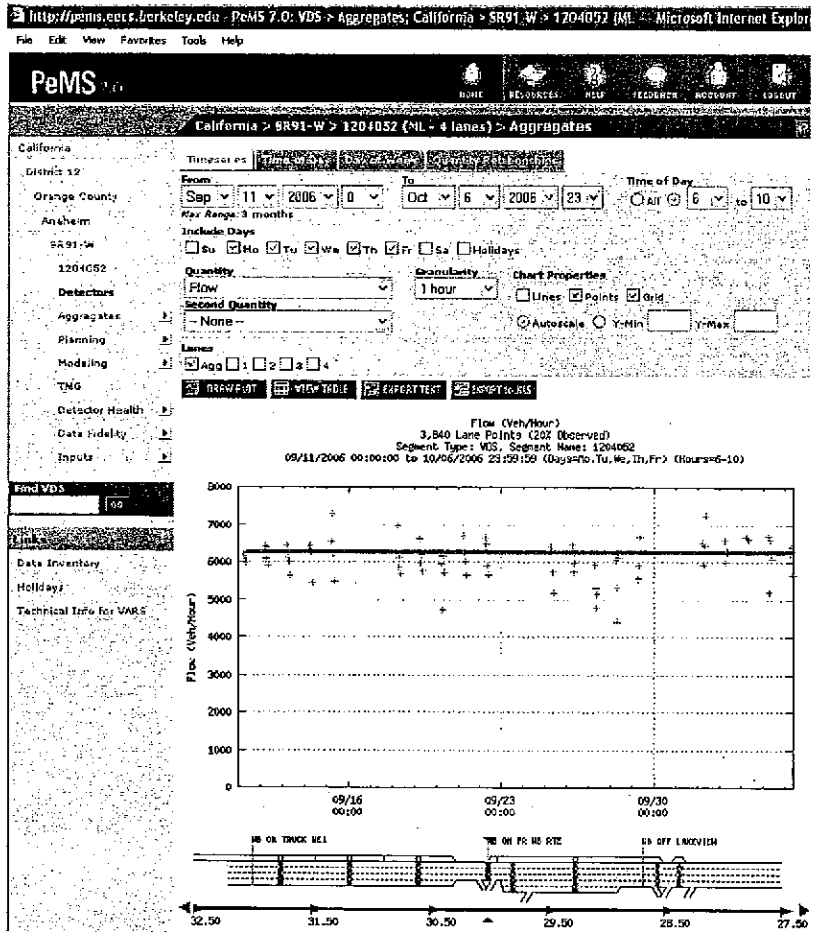
The 20-mile Rail vehicle hours estimate is 376,000 with the same average vehicle occupancy as the No Build. In addition, the 94,970 passengers in Table 3-9 are assumed to travel about half of the available rail line distance, that is, 10 miles on the average, and at the heavy rail average speed of 24 miles per hour. Their person hours of travel are, 94,970 * (10/24) = 39,571. Then the 2030 estimate is:

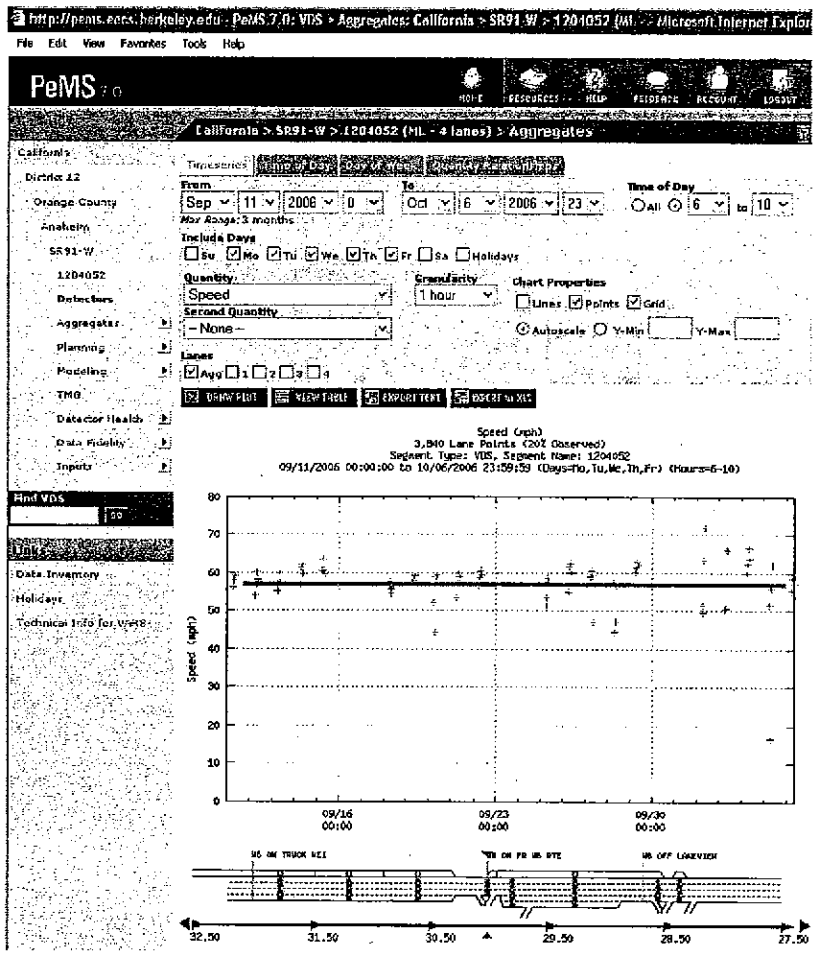
20-mile Rail Person Hours = 376,000/1.6 + 39,571 = *274,571* (2)

By comparing (1) and (2) it is clear that the hours spent traveling on Oahu with a 20-mile Rail line will be 11% longer than the No Build. It can be similarly proven that all Rail options will be worse than the No Build.

This outcome is not surprising because, at least in the U.S., the inability of new Rail systems to reduce traffic congestion is well established.

Appendix 2: Real Volume and Speed Operating Characteristics on California SR-91 Express Lanes





Appendix 3.a: Sample Comparisons of AA and Potential Traffic Performance

This set of estimates assumes that vehicular volume for ML is the same as the No Build. This is very conservative because in reality express buses will go from Waikele to Iwilei in 15 minutes.

	2003 Existing	2030 No Build	2030 ML wrong 2 lanes	2030 ML correct 2 lanes	2030 ML correct 3 lanes	2030 Rail (20)
H-1 Fwy	1.15	1.90	1.94	**1.76**	**1.50**	1.81
H-1 Fwy (HOV)	0.84	1.59	1.46	**0.96**	**0.96**	1.44
H-1 Fwy (Zipper)	0.89	1.29	NA	**0.85**	**0.85**	1.18
Moanalua Rd	0.97	0.60	0.57	0.57	0.57	**0.50**
Kamehameha Hwy	0.86	1.01	0.90	**0.90**	**0.90**	**0.89**
Managed Lane	NA	NA	0.79	**0.86**	**0.86**	NA

This set of estimates assumes that express buses will carry the same amount of passengers as the relatively slow and short 20 mile rail option. This is still conservative.

	2003 Existing	2030 No Build	2030 ML wrong 2 lanes	2030 ML correct 2 lanes	2030 ML correct 3 lanes	2030 Rail (20)
H-1 Fwy	1.15	1.90	1.94	**1.55**	**1.29**	1.81
H-1 Fwy (HOV)	0.84	1.59	1.46	**0.96**	**0.96**	1.44
H-1 Fwy (Zipper)	0.89	1.29	NA	**0.85**	**0.85**	1.18
Moanalua Rd	0.97	0.60	0.57	0.57	0.57	**0.50**
Kamehameha Hwy	0.86	1.01	0.90	**0.90**	**0.90**	**0.89**
Managed Lane	NA	NA	0.79	**0.86**	**0.86**	NA

(*) Kalauao Stream Koko Head bound

Highlighted cells show best 2030 V/c ratio – lower ratio means less congestion.

ML provides the most traffic relief for the AA's highly optimistic 2030 growth rates.

With a 3-lane ML and good express buses, congestion in 2030 will be similar to 2003.

Columns without any highlighted cells contain data exactly as they appear in City's AA.

Engineered to fail: The City added a 2-lane ML and deleted the AM zipper, for a net addition of a single lane! (See Table 3-12.) This is shown above as "ML wrong". "ML correct" has the zipper lane restored.

Appendix 3.b: Detailed Traffic Volume-to-Capacity Rations for a Cross-Section in Aiea

SCREENLINE / FACILITY	Existing Conditions (2003) Facility Capacity (vph)	PB lanes	Observed Volume (vph)	Volume/ Capacity Ratio	Level of Service	2030 Facility Capacity (vph)	2030 No Build Alternative Forecast Volume (vph)	Volume/ Capacity Ratio	Level of Service	2030 Managed Lane Alternative: Two-direction Option Forecast Volume (vph)	Volume/ Capacity Ratio	Level of Service	Reversible Option Forecast Volume (vph)	DIFF	PB lanes	Volume/ Capacity Ratio	Level of Service	CORRECTED Reversible Option (2 lanes) Forecast Volume (vph)	correct lanes	Volume/ Capacity Ratio	Level of Service		R20 option Forecast Volume (vph)	Volume/ Capacity Ratio	CORRECTED Reversible Option (3 lanes) Forecast Volume (vph)	correct lanes	Volume/ Capacity Ratio	Level of Service
Kalauao Stream Koko Headbound																												
H-1 Fwy	9500	5	10960	1.15	F	9500	18049	1.90	F	18327	1.93	F	18419	370	5	1.94	F	16695	5	1.76		10% better than PB	17209	1.81	14225	5	1.50	
H-1 Fwy (HOV) 1	1900	1	1600	0.84	D	1900	3014	1.59	F	2882	1.52	F	2769	-245	1	1.46	F	1828	1	0.96		34% better than PB	2740	1.44	1828	1	0.96	
H-1 Fwy (Zipper) 1	1900	1	1700	0.89	D	1900	2444	1.29	F	1677	0.88	D	NA	0	0	NA	NA	1613	1	0.85		PB mysteriously deleted zipp	2241	1.18	1613	1	0.85	
Moanalua Rd	1700		1650	0.97	E	1700	1018	0.60	B	918	0.54	A	966	-52		0.57	A	966		0.57		Same as PB	853	0.50	966		0.57	
Kamehameha Hwy	3450		2960	0.86	D	3450	3498	1.01	F	3226	0.94	E	3121	-377		0.90	E	3121		0.90		Same as PB	3059	0.89	3121		0.90	
Managed Lane	4400	0	NA	NA		NA	2200	NA	NA	NA	1769	0.80	D	3457	0	2	0.79	C2	3800	2	0.86		Same as PB	NA	NA	6270	3	0.95	
Total General Purpose Traffic	14650		15570	1.06	F	14650	22565	1.54	F	22471	1.39	F	22507			1.39	F	20782					21120	1.31	18312			
Total HOV Traffic	3800		3300	0.87	D	3800	5458	1.44	F	4559	1.20	F	2769			1.46	F	3441					4980	1.31	3441			
Total Managed Lane Traffic	NA	7	NA	NA		NA	2200	NA	NA	NA	1769	0.80	D	3457		8	0.79	C2	3800	9				NA	NA	6270	10		
		correct						28023			28799			28732	wrong, should be 9				28023	correct						28023	correct		

Identical totals – although the reversible ML will carry many more people and a smaller number of vehicles (lower traffic volume)

SCREENLINE / FACILITY	Existing Conditions (2003) Facility Capacity (vph)	PB lanes	Observed Volume (vph)	Volume/ Capacity Ratio	Level of Service	2030 Facility Capacity (vph)	2030 No Build Alternative Forecast Volume (vph)	Volume/ Capacity Ratio	Level of Service	2030 Managed Lane Alternative: Two-direction Option Forecast Volume (vph)	Volume/ Capacity Ratio	Level of Service	Reversible Option Forecast Volume (vph)	DIFF	PB lanes	Volume/ Capacity Ratio	Level of Service	CORRECTED Reversible Option (2 lanes) Forecast Volume (vph)	correct lanes	Volume/ Capacity Ratio	Level of Service		R20 option Forecast Volume (vph)	Volume/ Capacity Ratio	CORRECTED Reversible Option (3 lanes) Forecast Volume (vph)	correct lanes	Volume/ Capacity Ratio	Level of Service
Kalauao Stream Koko Headbound																												
H-1 Fwy	9500	5	10960	1.15	F	9500	18049	1.90	F	18327	1.93	F	18419	370	5	1.94	F	14772	5	1.55		10% better than PB	17209	1.81	12302	5	1.29	
H-1 Fwy (HOV) 1	1900	1	1600	0.84	D	1900	3014	1.59	F	2882	1.52	F	2769	-245	1	1.46	F	1828	1	0.96		34% better than PB	2740	1.44	1828	1	0.96	
H-1 Fwy (Zipper) 1	1900	1	1700	0.89	D	1900	2444	1.29	F	1677	0.88	D	NA	0	0	NA	NA	1613	1	0.85		PB mysteriously deleted zipp	2241	1.18	1613	1	0.85	
Moanalua Rd	1700		1650	0.97	E	1700	1018	0.60	B	918	0.54	A	966	-52		0.57	A	966		0.57		Same as PB	853	0.50	966		0.57	
Kamehameha Hwy	3450		2960	0.86	D	3450	3498	1.01	F	3226	0.94	E	3121	-377		0.90	E	3121		0.90		Same as PB	3059	0.89	3121		0.90	
Managed Lane	4400	0	NA	NA		NA	2200	NA	NA	NA	1769	0.80	D	3457	0	2	0.79	C2	3800	2	0.86		Same as PB	NA	NA	6270	3	0.95	
Total General Purpose Traffic	14650		15570	1.06	F	14650	22565	1.54	F	22471	1.39	F	22507			1.39	F	18859					21120	1.31	16389			
Total HOV Traffic	3800		3300	0.87	D	3800	5458	1.44	F	4559	1.20	F	2769			1.46	F	3441					4980	1.31	3441			
Total Managed Lane Traffic	NA	7	NA	NA		NA	2200	NA	NA	NA	1769	0.80	D	3457		8	0.79	C2	3800	9				NA	NA	6270	10		
		correct						28023			28799			28732	wrong, should be 9				26100	correct				26100.00		26100	correct		

-----Original Message-----
From: Pam Smith <pamsmith@hawaii.rr.com>
To: Kaku, Melvin N <mkaku@honolulu.gov>
Sent: Tue Apr 10 15:56:59 2007
Subject: testimony regarding the scoping process

I am submitting this as testimony for the scoping process going on right now.

Concerning the process of determining the best alternative for transportation on Oahu, my fellow area residents and I have been

disenfranchised from the discussion

I have only received after the fact glossy pieces from the city transportation department. No meetings were held in my area although we are the ones this transportation system is supposed to serve. Even my neighborhood board has not held any committee meetings to discuss this issue and to allow the community to provide an input.

The mayor and his administration has made sure that they hold meetings only in places where the people who attend will be receptive to the fixed guide way system he has touted.

It hasn't been fair and I am outraged that I have not been allowed to participate.

Pam Smith

91-321 Pupu Place

Ewa Beach, Hi 96706

398-5556

April 10, 2007

From: EArakaki
To: Melvin N Kaku
Sent: Apr 11, 2007 3:50 PM
Subject: Testimony re; Transportation hearings process

April 10, 2007
I would like to submit this testimony for the scoping concerning the process that was used for determining the fixed guide way as the preferred alternative for the city and county of Honolulu.

I have been an Ewa Beach resident for over 60 years. Our transportation problems began in the mid 1990's as new construction in the Haseko and Gentry developments brought in thousands more people without concurrent road or transportation improvements. Still, with the preferred alternative of a fixed guide way, the city's own analysis says we will not have any traffic relief, in fact the city's analysis says traffic congestion will get worse with the fixed guide way.

Additionally, there were no meetings held in Ewa Beach to determine what our opinion was on the project. The meetings were held in Kapolei that will get a station, the city didn't hold meetings in Ewa Beach because they knew it would be negative. Holding the meetings in Kapolei is like opening a free bar for a bunch of alcoholics, you're gonna get a big crowd and they're all gonna be for whatever the city says. I and all the other residents of Ewa Beach were left out of the process conducted by the city to determine not only the preferred alternative but whether or not we wanted something that we have to drive 5 miles through heavy traffic to use that is not going to reduce traffic congestion.

It's not been a fair process.

Earl Arakaki
91-030 Amio St.,
Ewa Beach, H.I.
96706
phone (808) 689-3400

-----Original Message-----
From: James Quimby [mailto:jquimby@steadfast-hawaii.org]
Sent: Monday, April 09, 2007 1:06 PM
To: Kaku, Melvin N; Donna.Turchie@fta.dot.gov
Subject: Honolulu High Capacity Transit Corridor Project

Dear Folks:

I am writing this letter to protest the procedure used to "sell" the rail transit system to the the citizens of Honolulu. At no time during this process was a fair debate allowed between proponents and opponents. Ideally there should have been a televised debate or at least a radio debate. In my opinion, the proponents were aftraid to face a truly informed public.

Secondly, there was never a PROPER discusssion on the cost of the project. None of the public meeting showed cost figures. Nor did it show what type of system we would have or what we are paying for. This entire process was FLAWED and should not be allowed to continue. Also, there was never a discusssion of alternatives to a rail system.

Finally, the route itself that is suppossedly approved is a joke. There seems to be a desire by the politicians to have this system in spite of the route. How could any system leave out the Airport and the University of Hawaii? This makes absolutely no sense at all!. Thank you for your time.

Sincerely,

Jim Quimby
2945 Haawale Place
Honolulu, HI 96822

Mr. Alan S Lloyd
383 Kaelepulu Drive Apt. B
Kailua, HI 96734

TO: DEPARTMENT OF TRANSPORTATION SERVICES
CITY + COUNTY OF HONOLULU

SUBJECT: EIS FOR HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT.

THANKYOU FOR THIS OPPORTUNITY TO COMMENT ON THE SUBJECT EIS ON THE SUBJECT "FIXED GUIDEWAY" AND A "MANAGED (TRAFFIC) LANES ALTERNATIVE" FOR THE H-1 CORRIDOR BETWEEN WAIPAHU AND DOWNTOWN HONOLULU.

NEED: THE H-1 IN THE WAIPAHU TO HONOLULU CORRIDOR IS TERRIBLY CONGESTED.

OPTIONS: INSTALL A "FIXED GUIDEWAY" (RAIL SYSTEM) AND/OR A "MANAGED LANES" ALTERNATIVE.

BASED ON WELL DOCUMENTED MAINLAND EXPERIENCE, THE FIXED GUIDEWAY ALTERNATIVE MAY BE ABLE TO HANDLE INCREASED FUTURE COMMUTER TRAFFIC BUT WILL NOT IMPROVE THE EXISTING OR FUTURE CONGESTION ON THE H-1. THE ADDITION OF 2 OR 3 REVERSABLE "MANAGED LANES" WILL REDUCE EXISTING AND FUTURE TRAFFIC CONGESTION ON THE H-1, BE FAR MORE FLEXIBLE AND PROVIDE AN ALTERNATE ROUTE WHENEVER THE H-1 IS SHUT DOWN FOR FOUR HOURS FOLLOWING TRAFFIC ACCIDENTS.

ACCORDINGLY - THE EIS RELATED TO THE "MANAGED LANES ALTERNATIVE" MUST BE GIVEN A FAIR AND EQUALLY DOCUMENTED REVIEW AND EVALUATION.

NOTE: PARKING ON THE HONOLULU END OF THE "MANAGED LANES ALTERNATIVE" FOR THE ADDITIONAL TRAFFIC WILL BE PROVIDED (BY BOILDING CODE) BY THE PRIVATELY OWNED DESTINATION FACILITIES. (OFFICE BLDGS. SHOPPING CENTERS, ETC.)

THANKYOU, Alan S. Lloyd, LICENSED PROF. ENGINEER,
PHONE/FAX 808-261-7064

TPO-

TO: DEPARTMENT OF TRANSPORTATION SERVICES
City and County of Honolulu
650 South King Street, 3RD Floor
Honolulu, HI 96813

COMMENTS ON HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT

COST: Why do you want to spend billions of dollars to build a monstrosity that even you admit will not ease traffic congestion? The route that was chosen is not going anywhere and will not do anything nor serve the public good. What a WASTE of our TAX dollars!!!

The City has to or wants to hire additional staff for this project. More tax dollars needed. How much will the acquisitions of right of way cost? How many people and businesses will be displaced? What about property for the train yard and maintenance yard? How do we finance operating and maintenance? What is the true cost of this white elephant?

ENERGY COST: What will it cost to run the trains? If it is run by electricity, will the community be shortchanged? Judging by some of the incidents that have happened, we have problems during maintenance. What will power the trains and stations when we have blackout situations?

SAVE TIME? How can you claim that it will give people quality of life because it will save time? One has to wait to catch a bus to get to the train station; then wait for the train, then wait to catch another bus to get to one's destination. What a WASTE of TIME!!!

QUALITY OF LIFE. Imagine our quality of life if our sewer system goes bad. The last City Council that voted down the train knew our sewer system needed an overhaul costing couple of billion dollars. And what has been done about it since then? We got the case of the Ala Wai. When is our City administration going to wake up? PHEW! The smell of WASTE will be overwhelming, not to mention how unhealthy it will be if something is not done and soon.

TRAIN STATIONS: Understand that some of the stations will be between 3 to 5 stories high. Aesthetically it is unfriendly. Then, all we need is an earthquake to undermine the structures and render the trains useless.

Are all our roadway lanes going to be intact? It will be a great disserve to the public that in order to build the structures, you are going to take away any roadway lanes. This is a NO, NO!!

Do not underestimate the problems at train stations. You know that they have to be handicap accessible and that means elevators. (Here is a tremendous maintenance cost) Have you not studied the problems of the homeless, the criminals and all things negative at other train stations? Let us not put these things under the rug. I recall being advised not to go to certain train stations in San Francisco in broad daylight.

You and I know that there are many ways to ease the traffic, if only they will be tried before spending monies that we do not have and cannot afford.

Mahalo
Ruth Nakasone

Ruth Nakasone
2216 Apoepoe St.
Pearl City HI 96782

07 APR 13 A8:34
RECEIVED

IP 04092

DEPARTMENT OF TRANSPORTATION SERVICES
ATTN: Honolulu High-Capacity Transit Corridor Project
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii, 96815

Scooping Comments, 13 April 2007
From Prof. Philip Blackman, 1676 AlAmoana Blvd. #406, Honolulu, Hawaii, 96815 9413901 phil@aloha.net

The scooping recommendations are offered to repair errors and omissions within the alternatives analysis so far, and to add for public and government guidance, key pieces of information hidden or not sufficiently considered.

FTA asks that the scope directly address the stated transportation problem in the corridor. The identification of promising alternatives entails an understanding of the underlying causes of the problems in the corridor, and the potential of particular types of transportation investments to solving those problems.

CONGESTION:
The local transportation problem is congestion. The congestion is based on the below average miles of road per person, road maintenance deficiencies, non-implementation of available technology improvements, and policies reflecting the popularity of cars without balancing policies rewarding more productive use of vehicles. The "problem" needs objective, measurable definition within the scooping document with current accurate data and well-defined methodology supporting "projections" and "estimates".

PUBLIC TRANSPORTATION:
The scoping must clearly define "public transportation". Its principle characteristic is a subsidized service. What it contributes is generally speaking, a service that the user does not see valuable enough to willingly pay the actual cost. This contrasts, for example, with users of taxies that pay a fee that does cover costs and allows a company and its employees to sustain the service and their livelihood.

FIXED GUIDEWAY:
The fixed guideway as a rail system must be defined within the scooping document as strictly a 'public transportation" component, and an adjunct to its parent, and necessary infrastructure, TheBus. Accordingly the scooping must give a very candid and illuminating picture of the existing bus system. This includes ridership by route, time of day, production/destination, etc. as in the Dec. 2006 ridership survey. Projections of these rider "habits" and statistics need to be projected along side of "guideway rail projections". Currently the degree of subsidy can be magically shifted to TheBus and away from rail to improve the apparent, yet not truthful, "productivity" of rail. Additionally more detailed cost/use/load factor data of bus operations must be included to clearly illustrate the reality of near empty busses consuming energy and costs currently camouflaged by "averages". How likely is it that the projected train every three minute going to and from the University starting at 6AM will be anything but an energy hog for most trips.

VEHICLE TYPES AND NECESSITY:
The scoping process must clearly define the vehicular traffic that must use the road system, or is a hands down better alternative for mobility than public transport. Thus a mom scheduling several errands to include dropping off kids, picking up groceries, shopping, and a doctor's appointment, is a vehicle use that makes more sense than using public transport. The government vehicle, cement truck, or plumber's utility truck similarly represents a "constituency" that deserves to have a well-run and adequate road system. The scooping should include these vehicle counts and their "road demand" needs. Parking policy, such as subsidies to government employees driving to work, must be identified within the scope. The scooping should allow a citizen to make a judgment. How does the study present the implied choices when technology offers a four-passenger hybrid of 42mpg with totally flexible schedule and route, as compared to a bus choice on fixed route and schedule that carries up to 36 passengers at 3mpg..

HOT and SMART:
Elevated guideway and added lanes and HOV policy using transducer identification and capacity pricing have excellent potential when designed to work, rather than poorly designed to act only as a strawman for failure. Designing capitol assets that support both public transportation AND road dependent veicles is an obvious plus.

Hope this is helpful, and that the processes by which you acknowledge these suggestions and promulgate the new scooping document honor the significant effort by a concerned constituency to help you serve better the needs of Hawaii's citizens and visitors. MAHALO.

RECEIVED 2007 APR 30 A 9:30

TP 203533

Tom Dinell, FAICP
3694 Kawelolani Place
Honolulu, Hawaii 96816-3304

Phone: 808-734-8102 Fax: 808-735-7686 e-mail: dinell@hawaii.rr.com

April 11, 2007

RECEIVED
07 APR 12 A7:50
DEPT. OF TRANSPORTATION SERVICES

Department of Transportation Services
City and County of Honolulu
650 South King Street, Third Floor
Honolulu, Hawaii, 96813
Attn: Honolulu High Capacity Transit Corridor Project

FAX: 808-523-4730

Dear Honolulu High Capacity Transit Corridor Project Team:

This letter is in response to your invitation to members of the public to submit comments relating to the scoping process in general and to "the alternatives, including the technologies, to be evaluated" in particular.by April 13, 2007.

There was a major gap in the city's November 1, 2006, Alternatives Analysis Report on rapid transit options for Oahu: It did not examine a possible high-speed bus system that could run on the same kind of exclusive right of way now being proposed for the fixed guideway rail system.

Some very preliminary mention of this possibility was raised in December when the City Council adopted the final version of Bill 79 — the measure approving a fixed guideway for rail or buses. The bus option, however, merits more than cursory consideration.

The basic choices set forth in the Alternatives Analysis were: no-build; transportation system management; managed lane (that is, a two-lane, grade-separated highway viaduct); and fixed guideway. The latter is based on multi-car trains, about 175- to 200-feet long, with each train able to carry 300 passengers.

What I am terming the "high-speed bus" is not examined in the Alternatives Analysis, nor is it included among a short list of options in that document

that were considered but rejected. No reason was given for not analyzing the High Speed Bus or a similar approach in either the Alternatives Analysis or in the Alternatives Screening Memo issued last October. This omission should not stand; with the wealth of data already collected, a relatively quick professional analysis is possible.

The Mayor's announcement this past January that he is ready to proceed with a $3.8 billion rail line from East Kapolei to Ala Moana Center (see Honolulu Star Bulletin, January 31, 2007) only adds to the urgency of scrutinizing the one other significant alternative not previously examined, namely, the High Speed Bus using the same exclusive right of way as the rail system. When one expends $3.8 billion, one wants to be as certain as possible that the very best choice has been made.

The High Speed Bus would be very different than the Harris Administration's BRT proposal, which in its In-Town portion had buses traveling on city streets and in many cases taking lanes away from ordinary traffic, and in its Regional segment utilizing H-1 for part of its route.

Rather, a High Speed Bus would operate along the same alignment designated for the fixed guideway alternative, beginning in the Kapolei/Kalaeloa area and terminating at Ala Moana Center (the 20-mile option) or at the University of Hawaii at Manoa (the 28-mile option).

This alignment would need to be modified so as to provide five or six access and egress ramps at the end points and along the way to allow articulated buses to enter and depart the exclusive right of way. This restricted roadway would run overhead, just as is proposed for the fixed guideway transit system.

Vehicles in such a system would be articulated or similar high capacity buses. The roadway would be similar to a highway, but for the exclusive use of regularly scheduled transit buses and emergency vehicles. There would be stations along the way, just as with the rail line.

What would be some of the advantages of the High Speed Bus?

- The High Speed Bus would significantly reduce the number of times the majority of passengers would have to change from one mode of transportation to another. Every time people have to shift from bus to train or from car to train or from bus to bus, some decide they would just rather stay in their cars. Overall, this system would likely attract more passengers than would rail, though this again is a matter to be examined and documented.

- Articulated buses would provide people living in communities not located along the exclusive right of way (e.g., Mililani, Waianae) with access to that right of way without having to make an additional shift from one vehicle to another.

- While each High Speed Bus vehicle would carry fewer passengers than a multi-car train, the frequency with which such articulated buses would arrive and depart would be significantly greater than for trains.

- The High Speed Bus system would allow modification in routes accessing the exclusive right of way as demand changes in the future. Such changes will occur due to new residential, commercial, and light industrial developments in areas such as `Ewa or Central O`ahu.

- A High Speed Bus provides the same kind of opportunities for transit-oriented development around selected stations as would the rail line.

- Travel by High Speed Bus vehicles along the exclusive right of way would probably be just as fast as by rail, since the spacing between stations will be relatively short and therefore trains will not be able to run at high speeds, one of the usual advantages of that mode of transport.

- If there is a vehicle breakdown, then the High Speed Bus system can continue to operate with minimum delay, unlike a rail system -- unless an elaborate network of switches, signals, and sidetracks is provided along the fixed guideway.

- The system may cost less to build than the proposed rail system and is likely to cost less to operate, taking into account all aspects, including maintenance and replacement, again matters that need to be documented.

- The exclusive right of way would vastly reduce the time it takes emergency vehicles to reach Honolulu from outlying districts, and vice versa, probably saving several lives each year.

What might be some of the disadvantages of the High Speed Bus?

- The High Speed Bus would require more drivers than a fully- or partially automated rail system.

- Building the necessary five or six entrance and exit ramps is likely to result in some dislocation of vehicle traffic around the ramps.

- Buses, even articulated hybrid vehicles, are unlikely at this time to be as energy-efficient or as quiet as trains on a fixed guideway, though this remains to be documented. One point to consider, however, is that buses are replaced every 10 to 12 years, thus allowing the City to take advantage of a range of technological improvements at frequent intervals. The same possibility does not hold true for trains.

- The roadway may need to be somewhat wider than the proposed fixed guideway and some high usage stations, e.g., downtown, Ala Moana, somewhat larger, though, again, these aspects need to be examined and documented.

- Unless there is a binding and enforceable commitment from the very start to keep all vehicles except regularly scheduled buses and emergency apparatus off the right of way, there could be unwelcome operational problems and undesirable consequences. The political pressure to allow this or that class of vehicles to use the right of way will be great, which is why it is important that such options be banned from Day One.

- It may or may not be a "disadvantage," but buses, even deluxe buses, are seldom as glamorous as trains.

Perhaps the High Speed Buses could be partially funded from federal sources other than the Federal Transit Administration's New Start program and with less time delay.

An article in the August 2006 Metro Magazine, written by Cliff Henke, a senior analyst at Parsons Brinckerhoff, notes that Jeff Boothe, head of the New Starts Working Group, has stated that the New Starts evaluation process now takes more than 100 months and shows signs of lengthening.

I would strongly urge you to request the highly respected consultant firm, Parsons Brinckerhoff, to run an analysis of the High Speed Bus concept. This option should be compared to a fixed rail transit line in regard to total travel time, number of passengers served, construction and operational costs, environmental impacts, availability and timeliness of federal funds, social consequences, and other similar aspects.

This additional analysis should not take long, because Parsons Brinckerhoff already has much of the required information in hand, including data on the two alternative routes.

Neither you nor I know at this point whether the High Speed Bus is a better or worse option than the proposed fixed guideway rail system. Only when we have the necessary professional analysis available will you be able to recommend the best decision for the people of Honolulu.

I trust you will find these comments about the missing alternative helpful as you proceed in your work.

aloha,

Tom Dinell

Tom Dinell, FAICP

TP 4/07-204000

April 12, 2007

Department of Transportation Services
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

APR 13 3 16 PM '07

DTS
TRANS PLANNING

Re: Honolulu High-Capacity Transit Corridor Project Scoping

I recommend that the following issues be addressed in the Draft EIS(DEIS).

Traffic Congestion. The City's Alterative Analysis (AA) Study stated that the level of service (LOS) is now F on our highways in the main corridor and will be a LOS F with a mass transit alterative in 2030. Since the Federal Department of Transportation (FDOT) is now emphasizing reducing traffic congestion as one of its transportation goals, the DEIS should demonstrate this in the following concerns.

1. **Travel time:** This time should be measured from home to work place from different areas for both the transit alterative and the highway vehicles in 2005 and 2030. DEIS should consider the impact on commercial and emergency vehicles travel time between 2005 and 2030.
2. **Economics:** The DEIS should provide financial comparison between the proposed transit and the vehicle traffic in regard to travel time.Also, the assumptions for these comparisons should be spelled out. The economics is important since it effects our cost of living in Honolulu which was 5.9% in 2006 according to the Federal Government.
3. **Resources:** Comparisons should be made between the amount and cost of resources to power the transit and vehicles in 2005 and 2030. For vehicles, this might be complicated because in the next 23 years vehicles will be improved and they might be using the same source of power as the transit, that is electricity.

Greenhouse Gases. DEIS should begin to include consideration of reducing greenhouse gases in the city. According to the City's AA study, congestion will only get worse than it was in 2005 and the City is proposing to build a new transit facility which will be a new source of emissions. Higher density buildings are being proposed around transit stations which will increase greenhouse emissions. This DEIS should consider greenhouse emissions resulting from total transportation corridor since we are part of the global warming situation.

Project Costs: The State DBEDT stated that high-rise construction cost had a 9.1% increased from 2005 to 2006. The U.S. dollar has been falling in value since 2006 and will continue to fall. Honolulu's 2006 cost of living was 5.9% increase. Since the stated project costs were given in 2006 prices and the final project bids will be made in 2009, these bids will be much higher because of inflation and devaluation of the dollar, especially for foreign firms. The maintenance cost of the total transit system shown also be shown in the DEIS that take into account of inflation and dollar

devaluation. The DEIS should state the assumptions that are behind the projected project and maintenance costs so that the DEIS readers can truly evaluate information.

Revenues: Melvin N. Kaku, in his 2/22/07 memorandum (MM,34) to Mary P.Waterhouse, stated the following farebox recovery ratios.

	Revenue	Expenditures	Farebox Recovery Ratio
FY2006(actual)	$40,119,507	$137,280,444	29.22%
FY2007(est.)	$41,500,000	$142,936,673	29.03%
FY2008(est.)	$42,500,000	$156,199,242	27.21%

We can see from this memo as the farebox recovery ratio goes down, there will be a time that the fares will be rise. Deis should state this fact. The revenue and expenditures figures in the DEIS should reflect inflation and dollar devaluation during the stated time period. Like the project costs figures, the assumptions for the above figures should be given in the DEIS. Just stating the revenue and expenditure figures are not enough, the assumptions are necessary for DEIS reader evaluation.

Ridership: DEIS should show the total system riders, fixed guideway and bus riders, and the individual station users. Since one fare will gey a person from the bus to the fixed guideway to a bus, bus to a ferry to a bus, or bus alone, how can the DEIS readers determine that there is not double counting in the ridership numbers.

Bus Vs Rail: Since the City Council only approved the concept, **Fixed Guideway**, they let the door open for either bus or rail. Using pull out at each station will allow buses behind to pass a bus at the station, thus buses will have quicker travel time than trains. Also, buses can be built in the U.S. The DEIS should analzye both bus and train comparing their social, economic and environmental aspects. Buses should enter and exit at the beginning and end of the system.

Congestion Pricing: The City and County has the authority to place tolls on City highways and streets by HRS 46-1.5 (19)(d). The FDOT encouraging tolling to reduce traffic congestion and is funding cities to study this method as a way to cut congestion. Congestion pricing should be included in the DEIS.

Thank you for giving me this opportunity to comment.

Charles Carole

Charles Carole
1310 Heulu St. #1002
Honolulu, HI 96822
531-2503
chcarole@hotmail.com

Honolulu High-Capacity Transit Corridor Project

Welcome to the Honolulu High-Capacity Transit Corridor Project scoping meetings.

The FTA and DTS invite all interested individuals and organizations, and Federal, State, and local governmental agencies and Native Hawaiian organizations, to comment on the project's purpose and need, the alternatives to be considered in the EIS, and the impacts to be evaluated. During the scoping process, comments on the proposed statement of purpose and need should address its completeness and adequacy. Comments on the alternatives should propose alternatives that would satisfy the purpose and need at less cost or with greater effectiveness or less environmental or community impact and were not previously studied and eliminated for good cause. At this time, comments should focus on the scope of the NEPA review and should not state a preference for a particular alternative. The best opportunity for that type of input will be after the release of the draft EIS.

Please review the project information and ask project staff any questions about the project that you might have. The information presented at the scoping meeting is also available on the project website at www.honolulutransit.org.

You may provide official comments in several ways. Here at the scoping meeting you may provide oral comments to the court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulutransit.org or use this form to send a written comment to the Department of Transportation Services.

Name: Susan Chamberlain Address: 3045 Ala Napuaa Place, 1613

Phone: 836-5858 Honolulu 96818

E-mail: chamberlainsusan@yahoo.com

Comments:

In my opinion the following questions have not yet been answered satisfactorily. The questions highlight safety and quality of life concerns important to local and military residents situated close to the Salt Lake Blvd mass transit corridor. I do believe that these questions should have been answered prior to the City Council's "decision" on the Salt Lake Blvd route, but note that it's better late than never.

1. Exactly how much right of way will be required by the Salt Lake Blvd route to provide adequate access by machinery required to service malfunctioning train cars? Two tracks or one? Do you plan to allow at least as much protection on each side of the track as Amtrak does for safety purposes?
2. Do you plan to condemn any property abutting that route? If so, how much and where?
3. How much of a grade is involved at various points along Salt Lake Blvd, and how many decibels of noise will be generated by the trains?
4. Everyone seems to be hoping for the best, but we must prepare for the worst. So, what kind of protection do you plan to provide for residents in closely abutting residences against unimaginable yet all-too-real catastrophic accidents? Do you plan to condemn the new military housing on the makai side of Salt Lake Blvd and/or the largely owner-occupied condominiums on the mauka side? If a decision re condemnation has already been made, you should so admit now.
5. How high off the ground will the station at the nearly inaccessible Ala Nioi be, and how much real estate will be required? Do you plan to condemn more property around the station for parking?
6. Would not additional newly built buses produce less negative impact on the physical, social and spiritual environment, and the taxpayers' pocketbook?
7. What else in the way of consequences of the Council "decision" have you not publicized?

TP 203153

The Hayakawas

1330 Ala Moana Blvd.• No. 3901
Honolulu • HI 96814-4244

April 5, 2007

Department of Transportation Services
City and County of Honolulu
Attn: Honolulu High-Capacity Transit Corridor Project
650 South King Street, 3rd Floor
Honolulu, HI 96813

APR 10 12 57 PM '07
DTS TRANS PLANNING

RE: Honolulu Fixed Track Mass Transit

Dear Sir/Madam:

This letter is to express our following concerns on the Mass Transit System, which was approved by City and County Council in late February, as Ala Moana residents and as local taxpayers.

CONCERNS OF ALA MOANA RESIDENTS

A part of the proposed Mass Transit route in Ala Moana goes from Ward Ave. to Kona Street then to Ala Mona Center. This part of the route is of great concerns to those residing in the complex of five condominium high rises, consisting of Nauru Tower, Ala Moana, Hawi'iki, Ko'olani, and Hokua (the combined sum of residential units in the complex is well over 1,000). Kona Street is located virtually next to this complex.

We believe that the above stated part of the proposed route causes serious deterioration in our quiet residential atmosphere, congested local traffics, and impaired views around here. Photos taken recently are attached at the end of this letter for your understanding of our concerns.

CONCERNS OF LOCAL TAXPAYERS

The expected construction cost of the approved mass transit system is about $3.5 billion, requiring Federal Funding and revenues from 0.5% General Excise Tax Surcharge. Since the sum of Honolulu City & County revenues in the last fiscal year was about $1.4 billion, the construction cost is well over twice of the annual revenues. Future tax burdens of local residents is not clear at this time since costs for system operation, maintenance, and repairs are not available.

In views of the above concerns, we recommend as follows.

RECOMMENDATION

1. To change the proposed Mass Transit Route in Ala Mona that goes through Kona Street from Ward Ave. to an alternate route that goes through Kapiolani

Blvd. from Ward Ave., terminating at the intersection of Kapiolani Blvd. and Keeaumoku Street.

2. To place the alternate route, about 0.75 miles, in the underground

3. To provide us information on future tax burdens to local residents for bearing the costs of the operation, maintenance, and repairs of the Mass Transit System

Your consideration of the above would be appreciated greatly.

Respectfully Yours,

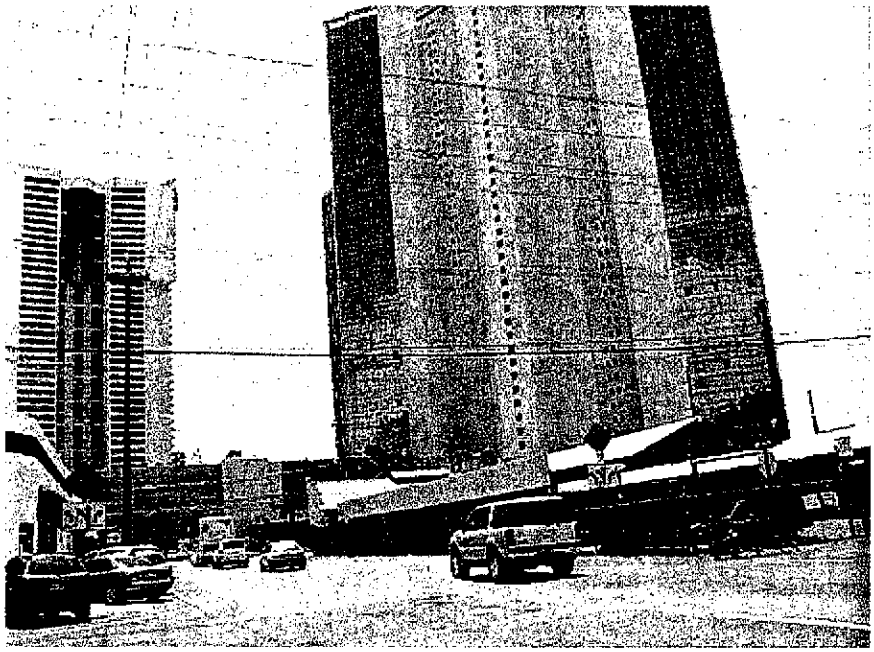
Kan-ichi Hayayakawa, Ph. D.
Professor Emeritus, Rutgers University

Setsuko Hayakawa, Esq.
Attorney at Law
State of New Jersey

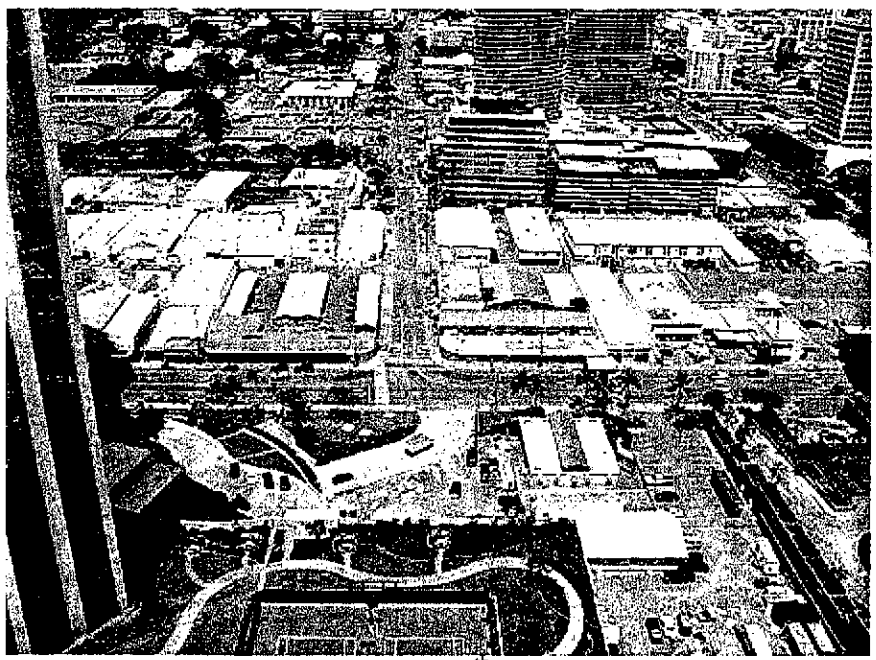
PS:

VIEWS AROUND A COMPLEX OF CONDOMINIUM HIGH-RISES IN ALA MOANA

View from the intersection of Kona and Pensacola, visible condominium high-rises being Hawai'iki, Ala Moana, and Nauru Tower (from left to right)



View from intersection of Kona and Pensacola, visible condominium high-rises being Nauru Tower and Ko'olani (from left to right). A small portion of Hokua is visible at the left edge of Ko'olani.



View looking North from our unit on the 39th floor in Nauru Tower. One straight street extending to the north, in the middle of the photo, is Pensacola. The first street crossing Pensacola is Waimanu, the second street is Kona, the third is Hokaka (one by mid-rise buildings), and the fourth is Kapiolani (a tree-lined street).

COMMENTS ON TRANSIT SCOPING MEETINGS

The following comments are provided on the mass transit project of the City and County of Honolulu, as presented through the media and public meetings. Any reference to the project in this comment sheet should be construed as "rail" rather than other potential uses for the fixed guideway.

Transit Support: Considerable criticism of both the concept of mass transit and the administration's handling of the project has been heard and read over the past year. From my perspective, the mayor and his staff, the Department of Transportation Services (DTS), and the Parsons Brinckerhoff (PB) analysts have done everything in a proper manner and have gone well beyond any "transparency" requirements to ensure that the public was well informed on the project and related issues. In contrast, many comments heard and letters and articles read indicate that some of our elected officials and many citizens are uninformed or pursuing specific agendas either opposing transit or promoting alternatives. The media generally accept these inputs without noting inaccuracies or identifying associations. Perhaps the project's public relations team needs to play a little "hard ball" in the future if the administration wants continued public support—which will be essential to counteract potential efforts to drop transit as elected officials change over the long term involved.

Locally Preferred Alternative (LPA): I fully support the 28-30 mile LPA as shown in the alternatives analysis (AA), including a spur into Waikiki. The opposition of the Waikiki community associations and its member of the City Council do not represent the best interests of all of the residents of O'ahu—and also do not represent the views of a number of Waikiki residents and people with jobs in the area with whom I have communicated. Even without an airport-to-Waikiki segment benefiting tourism, easy transit access to Waikiki will benefit businesses and enhance quality of life for many workers who keep the tourism "engine" operational. My personal reference for an LPA, as submitted early in the AA process, was for an additional seven or eight miles of guideway connecting the main line to Central O'ahu. The city should acknowledge the positive support given to transit from that area and indicate its desire to make that spur the first expansion of the LPA.

Minimum Operable Segment (MOS): My support of the airport alignment through Section III was given in written and oral testimony. Obviously, there was no choice but to accept routing via Salt Lake Boulevard if an MOS was to included in the "package" submitted for federal funding support. A member of the PB staff indicated that a composite alignment that also services the airport is still possible. Since the Salt Lake routing will require the guideway to go over the H-1 freeway at some point near Aloha Stadium, perhaps a composite alignment could keep it mauka of H-1 to the Aolele Street station, then cross over H-1 to connect to the main station for Salt Lake. This would eliminate the station near Kahuapaani Street; a larger park-and-ride lot is recommended for the Aloha Stadium station. Short of planning for two alignments through the airport and Salt Lake areas, a third station along Salt Lake Boulevard should be opposed. I also must reiterate my support for extending the west end of the MOS about 4,000 feet into

either Kalaeloa or a composite maintenance and rail yard that includes the Hawaiian Railway assets. Properties in the vicinity of Leeward Community College or along Farrington Highway sit on lands that are more valuable than that of Kalaeloa; better use can be made than a maintenance and storage yard in either of those areas. (Potential funding is addressed below.) Please consider the above for preliminary engineering.

Transit Service and Technology: Some form of express service is recommended for morning and evening rush hours, and occasional runs at other times. For the LPA, consider an express line with terminals only at Kapolei, UH-West O'ahu, Pearl City, downtown Honolulu, and the University of Hawaii (UH)-Manoa campus. Maximum speed for light rail is probably 50 miles per hour (mph); considering acceleration and deceleration between stops closely spaced, as on O'ahu, a 30 mph average speed may be the best that can be attained point-to-point. From West Kapolei to downtown Honolulu is about 20-23 miles, depending on the route selected. From the AA, it seems that stops between Kapolei and downtown will number between 16 and 20. Assuming an average speed of 30 mph and 30 seconds at each stop, the time from Kapolei to downtown will be between 48-56 minutes. Further assuming 15-20 minutes for either using a feeder system bus or driving to a park-and-ride rail terminal, another 3-6 minutes waiting for a train, and another 5-10 minutes walk to destination, the commute time from Kapolei becomes a minimum of 68 minutes and a maximum of 92 minutes. Extending the trip from downtown to UH-Manoa will add 9-10 stops and take about 15 minutes. These times are not conducive to luring people out of their privately owned vehicles (POVs) until the commute on the road becomes overwhelmingly unbearable—probably beyond year 2020.

There are two ways to address the time concerns: an express line or technology that delivers higher average speeds—or a (preferred) combination of both. Using a light rail express system will allow higher speeds point-to-point (perhaps even 45 mph). Time from Kapolei's western terminus to downtown along a 20-23 mile route will be 32-36 minutes, with the additional three miles to UH-Manoa adding 5-6 minutes (including the downtown stop). Conventional monorail does not appear to offer enough speed differential over light rail but magnetic levitation (maglev) intra-urban systems can reduce times considerably.

Maglev enhancements over the next few years should easily provide average speeds between stops approaching 100 mph. Using 60 mph will make the 20-23 mile—non-express—commute from Kapolei to downtown a trip of 28-31 minutes, with another 7-8 minutes to UH-Manoa. Applying the maglev technology to the above-mentioned express system (with 90 mph achieved due to less acceleration and deceleration) will result in a Kapolei-to-downtown commute of only 16 or 17 minutes, with three more minutes to UH-Manoa. A maglev express could change the West Kapolei-to-downtown full commute to a minimum of 38 minutes and a maximum of 52 minutes—home to office. Those times will definitely get people out of their POVs.

It is understood that an express will require additional guideway; however, a full third track is not necessary. At least one maglev system allows for track switching around stations. The additional costs incurred should—in the long run—increase ridership and,

therefore, fare collections. At the very least, an alternate "skip-stop" form of express service should be studied; however, true express is considered to be far superior.

The Guideway: During the past year, DTS and PB analysts mentioned the possibility of running the guideway at grade level in some areas of O'ahu, particularly in the open spaces of the Ewa Plain. These planners must drop that idea because no area within the high-capacity transit corridor will be rural by the year 2030. West Kapolei is already heavily urban, major housing, retail, and school developments are programmed in East Kapolei, and the Section I alignment through Kalaeloa is anticipated as a prime candidate for transit-oriented development. The guideway must remain elevated to avoid any negative impact on area roads or the possibility of train-vehicle accidents. A fully elevated guideway also allows for selection from multiple technologies. Even a small portion of the guideway at grade (perhaps through downtown) may force selection of light rail as the only acceptable form of technology.

I am aware that transit planners have—more or less—ruled out use of the guideway for some form of bus system. What they have not done satisfactorily, to date, is provide a detailed description of the differences between guideways supporting some form of rail or being used for buses. The larger size, greater "footprint," need for on-off ramps, and (resultant) increased costs to accommodate buses must be made clear to those still involved in the decision-making process as well as the general public.

System Power: Selection of rail technology could provide an impetus for alternative forms of energy used to generate the system's electricity. One form, for example, could be solar power from photovoltaic panels covering all transit stations, park-and-ride lots, and, perhaps, connected in series on the makai (i.e., sunny) side of the full length of the guideway. The use of alternative energy will not only be looked upon favorably by the Federal Transit Administration (FTA) and the Environmental Protection Agency but also help meet the governor's energy goals for the year 2020.

Following is some information collected on solar power: Each photovoltaic panel (5.3 x 2.9 feet) generates 165 watts. Assuming seven stations with 1,200 square feet of roof space each, solar power generated would be about 90 kilowatts (KW). Assuming three roofed park-and-ride lots of 250,000 square feet each, solar power generated would be about 8,050 KW. A single string of panels along the 20-mile MOS guideway would generate about 3,280 KW. Total solar power generating potential for the MOS would be 11,420 KW. Motor power ratings: Light Rail – 130-174 KW; Monorail – 750-1,500 Vdc primary power; and Maglev – 1,500 Vdc.

Funding: Most are aware of the money that will be generated from the surcharge on the general excise tax (GET) and federal funding support through Congress and the FTA. The mayor wants loans to expedite construction and also will pursue public-private partnerships. I am not privy to the recommendations made by the mayor's Transit Funding Advisory Committee; however, last year, I suggested a separate Oahu Power and Transit Authority (OPTA) to oversee system development, implementation, and operation. This body also could have selection and negotiation authority for the means of

powering the system. To make up the difference between fare receipts and operating costs, OPTA should be authorized to sell excess (solar generated) electric power to the Hawaiian Electric Company (HECO)—and purchase power from HECO as required.

Efforts to reduce or eliminate the state's ten percent cut of the GET surcharge (from House Bill 1309) were unsuccessful during the current session of the State Legislature. During testimony given on Senate Bill 930, which was held in committee, and House Bill 724, which passed but was not placed on a committee agenda when sent to the Senate, I perceived no support from the city or DTS. Perhaps an effort was made "behind the scenes" but, since the bills will reappear in the 2008 session, it is suggested that the city "go public" in an effort to add money to the special fund for transit. Elimination of the state's ten percent will add more than $300 million to that fund over the surcharge's life—a significant increase.

A World Class System (?): Is intra-urban maglev the best technology for O'ahu? Based on information made available to date, it is certainly competitive in terms of construction, operations, and maintenance costs; speeds, to include acceleration and deceleration; noise levels; and ability to support an express system. It also, to me, represents state-of-the-art technology that will attract not only commuting residents but also visitors interested in just "taking a ride." Presumably, maglev system developers will be as amenable as developers of other technologies to a public-private partnership.

A dynamic transit system also can help to make the "second city" of Kapolei something more than a typical suburban community. East Kapolei appears to be the last hope for developing something in Ewa that really resembles a downtown area of a major city—with a little difference, a portion with a college town atmosphere. With a little vision, the area around the transit station along the North-South Road between the UH-West O'ahu campus and the Ho'opili development can become a "destination." The concept referred to as "SmartGrowth" defines an area roughly a quarter mile in each direction from the center in which pedestrians can find virtually anything needed for living as well as entertainment. There are major "players" that would have to cooperate with the city and county as well as the state to create downtown Kapolei: the University of Hawaii; Hunt Building Corporation; D.R. Horton-Schuler; and the Department of Hawaiian Home Lands. These organizations can plan the college town on the west (UH) side of the road and the downtown to the east. It may not be the next Waikiki but it can be much more than the Aloha Tower Marketplace.

The "linchpin" for this concept would be a transit center (i.e., not just a station) with a huge park-and-ride lot. It could accommodate major retail and fast food outlets and other amenities, leaving the downtown area to entertainment venues (including live theater), specialty stores, and (indoor and outdoor) restaurants. The Ewa Plain and West Kapolei have accepted thousands of housing units, government offices, and (the inevitable) strip malls; it deserves a downtown East Kapolei as its quid pro quo.

Submitted by Frank Genadio
Telephone: 672-9170

Honolulu High-Capacity Transit Corridor Project

Welcome to the Honolulu High-Capacity Transit Corridor Project scoping meetings.

The FTA and DTS invite all interested individuals and organizations, and Federal, State, and local governmental agencies and Native Hawaiian organizations, to comment on the project's purpose and need, the alternatives to be considered in the EIS, and the impacts to be evaluated. During the scoping process, comments on the proposed statement of purpose and need should address its completeness and adequacy. Comments on the alternatives should propose alternatives that would satisfy the purpose and need at less cost or with greater effectiveness or less environmental or community impact and were not previously studied and eliminated for good cause. At this time, comments should focus on the scope of the NEPA review and should not state a preference for a particular alternative. The best opportunity for that type of input will be after the release of the draft EIS.

Please review the project information and ask project staff any questions about the project that you might have. The information presented at the scoping meeting is also available on the project website at www.honolulutransit.org.

You may provide official comments in several ways. Here at the scoping meeting you may provide oral comments to the court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulutransit.org or use this form to send a written comment to the Department of Transportation Services.

Name: Susan Chamberlain Address: 3045 Ala Napuaa Place, 1613

Phone: 836-5858 Honolulu 96818

E-mail: chamberlainsusan@yahoo.com

Comments:

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TRANSCRIPT OF VERBAL COMMENTS

MADE AT THE PUBLIC SCOPING MEETING

REGARDING THE ENVIRONMENTAL IMPACT STATEMENT

FOR THE HONOLULU HIGH-CAPACITY TRANSIT

CORRIDOR PROJECT

THURSDAY, MARCH 29, 2007

5:00 - 8:00 P.M.

MCKINLEY HIGH SCHOOL CAFETERIA

1039 SOUTH KING STREET

HONOLULU, HAWAII

BEFORE: SANDRA J. GRAN, CSR NO. 424

Registered Professional Reporter

RALPH ROSENBERG COURT REPORTERS, INC.

Wendell Lum
45-135 Lilipuna Road
Kaneohe, Hawaii 96744-3022

MR. LUM: My name is Wendell Lum, 45-135 Lilipuna Road, L-I-L-I-P-U-N-A, Road, Kaneohe. The Zip Code is 96744-3022.

I'm very familiar with Vancouver Sky Train. In fact, I provided information to the consultant. And I've been going to the website that was created by Bombardier, one of the primary contractors who built the Millennium Edition for the Vancouver Sky Train. In 1985 there was an Expo and the Expo line was created. And in the year 2000 construction was began on another extended line called the Millennium line for a distance of 12.6 miles at a cost of slightly under $800 million, and it included all the vehicles, maintenance, construction.

And that's the part where I have concern for the alternative being chosen. The Millennium line was very different from the Expo line. The Millennium line was a single column constructed with cars -- vehicles going both directions. In other words, if it was on this island, it would go east and west. And it was completed in two years. And for that Millennium line, it was built -- completed under

budget of $100 million. And I see the construction being put up faster. And the tools that they use, they can put up whole segments between columns, after the columns are put in, and put in the guide ways. And construction was done pretty rapid.

And the public had a chance to go on the website during that time, you know, 2000, 2002. That website was rapidtransit.bc.ca, but -- You still can get to the website, but then it's going to divert you to another system, another transportation system for the whole Vancouver Sky Train system.

And the system was done in two years, but the vehicles were made on the West Coast of Canada. And I'm assuming that the construction, if it was -- The construction was -- If we chose that manufacturer, hopefully, the same manufacturer -- Because I don't know how this bidding process of ours is going to be done. And I know there are experts in worldwide construction of transportation systems and airport and various kind of modes of transportation, not only a weight separated rail system. And I know they are based in Quebec, Canada, but there are plants not only in Quebec, but more in different parts of the world.

So I guess I can go on for quite a while, but I think going out and putting out to bid and choosing a manufacturer that has poor skills -- not poor skills, but

lack of skills and abilities -- I can see choosing a contractor that has a lot of skills or a big name that is well known in the transportation system worldwide. And I see subsidiaries and the local companies in Hawaii want to get on this thing and probably union labor, but I don't see it as a foundation or a significant funding that should be directed to local contractors. That's my opinion.

By the way, the vehicles in the Vancouver system in the Millennium line are driverless. There's no driver. And it uses -- it's very energy efficient and it's a very quiet system. It runs about approximately under 30 miles an hour, but close to that. It can go twice as fast, but just for the safety, I guess, it goes at a lower speed. And I know it uses very little electricity. And the maintenance --

There never has been any accidents in the Vancouver system. And that's an important part, I think. The City and County would want not to be held liable. And a company with a historical -- I don't know if the sky train system in Bangkok, maybe that's the same contractor, also, that built the system. I really don't know.

The Vancouver system was built in -- and the monies that I gave you of 700, approximately -- I think it was 760 million was in American dollars. So if you convert that to Canadian dollars, it's going to be about 1.2 million,

approximately.

That's all.

TRANSCRIPT OF VERBAL COMMENTS

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BEFORE: SANDRA J. GRAN, CSR NO. 424

Registered Professional Reporter

RALPH ROSENBERG COURT REPORTERS, INC.

Ted Kanemori
46-066 Heeia Street
Kaneohe, Hawaii 96744-3647

MR. KANEMORI: My name is Ted Kanemori, K-A-N-E-M-O-R-I, 46-066 Heeia Street, Kaneohe, Hawaii 96744-3647.

I'm in favor of the transit system. It's just that I disagree with the way they're going about it. All of the council people agreed that it's not the best solution to go through Salt Lake and all of the council people have stated that it's being done for political reasons. Mayor Hannemann says, "That's not our first choice, but it is our second choice." With all this dissension, I don't see how they expect to garner support from the public in spending these huge amounts of money.

Secondly, I think that the system should begin between Waikiki and Ala Moana. Talking to the support people here in this meeting, I've asked them: Once you build a one-mile segment from Kapolei, how many people are going to ride it? Once you build a second mile, how many people are going to ride it? But if you build that two-mile segment from Waikiki to Ala Moana, it will immediately become a revenue-generating source from the tourists.

Having told all that, they need a base yard to start the project. And I have asked them: After X number of years, will building the remaining rail system in Waikiki get any less expensive? I think that they ought to build

that first self-sustainable segment first and then go ahead and extend it out through Kapolei, whichever way they build it.

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Registered Professional Reporter

RALPH ROSENBERG COURT REPORTERS, INC.

Setsuko Hayakawa
1330 Ala Moana Boulevard, No. 3901
Honolulu, Hawaii

MS. HAYAKAWA: My name is Setsuko Hayakawa, 1330 Ala Moana Boulevard, No. 3901, Honolulu, Hawaii.

I have seen the map of the railroad and I think it is misplaced because the railroad is coming right behind the high density condominium area between Ala Moana Shopping Center and Ward Center. And the train, by its nature, makes lots of noise during the construction and also during the operation.

And I think that the railroad should be placed, if it ever has to be placed, towards the -- close to the H1 or Kings Business Area, King Street Business Area. Or, more preferably, I think the express railroad should stop at the Alakawa area right outside of the downtown area from the west. And then everybody gets off there, then there should be a large bus terminal taking the people to the final destination. That way the City can save all the construction and maintenance costs in the -- beyond that point on and the purpose is well served.

And this way, the railroad coming right into the high density residential area, particularly between those two points that I mentioned, will be a great disturbance and harmful to the view and environment and the living condition

of the residents.

Thank you.

And, also, I'd like to say my husband, Kanichi Hayakawa, K-A-N-I-C-H-I, and I just want to say that he agrees with me. There are two opinions.

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Registered Professional Reporter

RALPH ROSENBERG COURT REPORTERS, INC.

Linda Starr
Post Office Box 240310
Honolulu, Hawaii 96824

MS. STARR: My name is Linda Starr. It's Post Office Box 240310, and it's Honolulu, Hawaii, Zip Code 96824. And my e-mail is wailan@hawaii.rr.com.

I used to work for State DOT from 1971 to 1979. And I've been on the Kuliouou, Kalani-Iki Neighborhood Board, too, for 20 years as the transportation chair, the

chair of transportation. And I've been the chair of the transportation committee for just about 20 years, so I've been reactive in the transportation issues.

I've ridden mass transit in Hong Kong, in New York, in San Francisco, in Washington, DC, but -- you know, so I've ridden mass transit systems from a disabled person's point of view with cane, with crutches, with wheelchair. And I have a lot of concerns on how the people that use the assistive devices are going to be able to readily use these systems.

A lot of systems are compliant, but not practical or not usable. They're minimally compliant. We rely on elevators. If the elevator breaks, you can't use the system. Because we need the elevator, we have -- sometimes we have to wait like three and four routes of elevator going up and down because you've got people that use the elevator, they've got their suitcases, they've got their computer on wheels, they've got their children in strollers, whatever. And so one of the systems, I sat there and I waited for the elevator to open and close I think like seven or eight times. It's not convenient.

My main concern for this project is that I don't believe that it is the solution that the community needs. They need something now. They need simple, low-cost items like synchronizing streetlights, like access lanes,

holding lanes. Simple, low-cost solutions like having dedicated service feeder, small buses to get people to the main bus station.

If the system, you know, does go ahead, I would like the system to provide services to the traditionally underserved communities such as Makaha, Wainani, Nanakuli. The traditionally underserved communities, that's where the low-income people who would be willing to take the service jobs in Waikiki would be working, you know.

I don't believe that Kapolei is the appropriate place for the start of the system. Originally, Kapolei community was to be a second Waikiki where the rich people would go, and they're not going to ride the train. We have the people at Ewa Beach, they would love to have some form of coordinated mass transit.

So how can I sum this up? No, no, don't (pause) --

There needs to be not only accessibility, but usability and practical-ness in the thinking of this system. Okay.

TRANSCRIPT OF VERBAL COMMENTS

MADE AT THE PUBLIC SCOPING MEETING

REGARDING THE ENVIRONMENTAL IMPACT STATEMENT

FOR THE HONOLULU HIGH-CAPACITY TRANSIT

CORRIDOR PROJECT

THURSDAY, MARCH 29, 2007

5:00 - 8:00 P.M.

MCKINLEY HIGH SCHOOL CAFETERIA

1039 SOUTH KING STREET

HONOLULU, HAWAII

BEFORE: SANDRA J. GRAN, CSR NO. 424

Registered Professional Reporter

RALPH ROSENBERG COURT REPORTERS, INC.

Katherine Kupukaa
95-685 Makaunulau Street
Mililani Town, 96789

MS. KUPUKAA: My name is Katherine Kupukaa, 95-685 Makaunulau Street, Mililani Town, 96789.

Well, anyway, I'm against this whole fixed skyway system only because I don't feel that they're going to have the ridership.

One of the big areas that I think much thought hasn't been given to is Kamehameha Highway around by Sam's Club. Anyway, I use that route coming from Mililani. Sometimes I get off the H2 and I take Kamehameha Highway. If they are going to take up, you know, two lanes to build this fixed skyway rail, what's going to happen to the traffic that right now is quite congested when you have the bus taking up the right lane? Which some mornings I have to pass two or three buses. But as soon as, you know, they pull up to a bus stop, I go right around and, you know, switch lanes and get in front of them. And that takes up, you know, my driving time.

So I don't know whether the engineers or whatever thought about these power lines along Kamehameha Highway. I mean, have they ever taken a look at that?

Also, another area is going down Salt Lake Boulevard. Where are all these people that are going to hop on to this rail system when I find that people on the bus

stops along Kamehameha Highway? No more than a dozen people. So I don't think people are going to give up their cars. You're looking at people who are just going to switch from bus ridership to the rail, which I find that why should we be taxed for all that to build the fixed skyway when they are not going to get the ridership?

And, anyway, what I see a bigger problem is when the one and three-quarter miles on the viaduct, we have a big problem where buses who are on the -- not the carpool lane, but the -- What do they call it? The zipper lane. They switch from the zipper lane and they come on to the viaduct. Now we have the A bus, the No. 52 and the C bus, C buses, and they're all cutting over, switching about three, four lanes. And so what the engineers need to do is find a solution for the buses that drive on the zipper lane so they can cut over.

I don't know. So, to me, the best solution would have been the hot lanes or the managed lanes. And I understand that that was dropped from the decision making as, I don't know, a viable transit system.

And, also, if the fixed skyway system is going to go on Dillingham Boulevard, I travel on Dillingham Boulevard. That's another area where there's a lot of cars going down there. And if you take up two middle lanes, what's going to happen to us drivers?

Anyway, that's all I have to say. Thank you.

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Registered Professional Reporter

RALPH ROSENBERG COURT REPORTERS, INC.

Caron Wilberts
733 16th Avenue
Honolulu, Hawaii

MS. WILBERTS: My name is Caron Wilberts, 733 16th Avenue.

I am for the rail system just as long as the property owners of Honolulu will not be footing the bill for it. We, the working poor and the elderly, have seen how frivolously our tax money has been spent over the years and the decades, and this project to us seems like it will probably be the same. We cannot afford any more tax increases. We are having to choose between buying groceries and buying our medicine. And everybody should have a fair responsibility in helping to pay for the transit, not just the property owners, because it always seems like the city council dips into our pockets. No more.

I have had a personal assurance from your budget chair that the property owners will not be footing the bill for this, and I will hold her to it. Just something for all of you to think about.

That's it.

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WEDNESDAY, MARCH 28, 2007

6:00 - 9:00 P.M.

KAPOLEI HALE

1000 ULUOHIA STREET

KAPOLEI, HAWAII 96707

BEFORE: LESLIE L. TAKEDA, RPR, CSR N0. 423
Certified Shorthand Reporter

Ralph Rosenberg Court Reporters, Inc.
Ofc: (808) 524-2090 Fax: (808) 524-2596

Rodlyn Brown
85-303 Kohai Place
Waianae, Hawaii 96792

MS. BROWN: First of all, we need this rail system put in as soon as possible. It should have been done 30 years ago, when it was more affordable than today. It should be through Kapolei, to Ewa, to the airport, to Manoa campus, because that way it will hit both the new campus and the old campus of the college,

and no political person should hold the people hostage as to where it goes. It needs to go where the people need it. And this is why we need to become a referendum state, so that the people can actually vote on these things instead of some political hacks that are holding the people hostage, taking it where they want, for their constituents only.

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Polly "Granny" Grace
P.O. Box 299
Waianae, Hawaii 96792

MS. GRACE: I'm Polly Grace, better known as "Granny," from Waianae. I come here speaking on behalf of the paycheck-to-paycheck families.

We need the transit to go from Kalaeloa to Waikiki, especially to Pearl Harbor, Hickam, and airport. Why we need that is because that's where -- the work force is coming from the west side of the island, then needs to go to the east side of the island or central side of the island to work. Most of us work paycheck to paycheck. If we don't get to work on time, it's hard, difficult to man a house, man a family. I know Salt Lake wants it; but we on the Leeward side, we need it to go to the airport and to Waikiki. There are a lot of kupunas who work at Waikiki as a second job for them because the Social Security doesn't pay that much and, you know, so they need the extra cash to live on. Most families in our area have to work two, three jobs to put food on the table. And they pay taxes, too, yeah, because they work two, three jobs. So, it's imperative that we have it Kalaeloa, through Ewa, through Waipahu -- Kapolei, Waipahu, Ewa -- no -- Kapolei, Ewa, Waipahu, to Pearl Harbor, Hickam, airport, and Waikiki. I know it seems selfish about not going to Manoa, but maybe eventually, because there are only students who ride the bus -- can ride the bus, where they get off at downtown and they can ride the bus up. Because there are more

people trying to make money than there are children trying to get education at UH, because we do have a Leeward, and eventually we'll have a West Oahu campus.

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Gig Greenwood
P. O. Box 22898
Honolulu, Hawaii 96823

WEDNESDAY, MARCH 28, 2007; KAPOLEI, HAWAII

MR. GREENWOOD: My name is Gig Greenwood.

Back in the '90s there was a competition for mass transit, and there were four competitors for the project. There was to be $1.8 billion for a mass transit system to run from Kapolei to Honolulu, with University of Hawaii, Waikiki, and the airport as part of the project. I was on the Aloha Skyways team, which did not get the bid. The team which got the bid received their winning bid on a Wednesday. On the following Monday, their price had gone from 1.8 billion to 2.2 billion. It was announced later in the week that the price would be $2.5 billion. And the week after that, they said they could not do the University of Hawaii or the Waikiki spurts for that amount of money. That's a little history of how mass transits have gone in the past.

The main reason I wanted to come down is that during the several years that I worked on the Aloha Skyways team, one of the things that we had determined was that people from outside of the state would make a difference whether or not the mass transit system would make a profit or not. At that time, we felt so strongly that the market was there for local and visitor traffic

to make a profit with a monorail that we had it totally privately funded; yet, today we're talking about having billions of taxpayer dollars fund this project. If done properly, a mass transit system in Hawaii can be profitable. We felt that the monorail would attract one-third or more of the visitors to Hawaii because they would want to ride on a monorail. Any other type of train is a train and would not get the ridership from outside of the state. Also, local people would want to ride a monorail, but the statistics showed that they were not as enthusiastic about other forms of mass transportation.

I would urge all of those who are considering our mass transit needs to highly consider some sort of monorail system and to promote it as a tourist destination, as well as a means of transportation.

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Georgette Stevens
P.O. Box 75414
Kapolei, Hawaii 96707

GEORGETTE STEVENS: As a resident of Kapolei and growing up on the Leeward coast, I have always supported a form of mass transit, whether it be light rail, heavy rail, a combination of different transportation modes, in order to get the people from the west coast to where a lot of the places of employment are. And it is unfortunate that it's taken us this long to even get to this point, and I would be very disappointed if we don't move further to where we actually have a system in place. So, I support the mass rail. I support whatever efforts we need to make to ensure that it happens, and that environmentally -- I will work hard to make sure that we are held accountable to the environment, but also to make sure that we do have the rail development.

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Carolyn Ancheta
91-1058 Keokolo Street
Kapolei, Hawaii 96707

MS. ANCHETA: My name is Carolyn Ancheta, and I'm from the Villages at Kapolei. I've been a resident in the Villages for 11 years, and I have watched the growth that has been just in the recent 5 years really taking off, including the land value. But most of all, what I'm looking at at this time is the value as to the relationships of the people and what's happening in the Villages, to the point where -- people leave so early in the morning and come home late at night. They're not able to attend our meetings, which is a very dangerous situation, because there's not enough communication given to give the great value of what is needed here. So, by them not getting there, we are put on the table to accept what is put there. The issue is that I've been called by many people to speak out in public on it.

I'm on the Board of Directors of the Villages of Kapolei for some 4,000 houses and still growing, have done a lot of volunteer work within the community and schools and civic meetings with the City and County, Division of Planning and everything; and now as I've

taken time off and now I'm jumping back in, I feel that, you know, everything has been done and planned. And now I'm hearing the older people voicing and saying that they would really want it not to pass through the center of Kapolei, the city, but in the outskirts of Kalaeloa and continuing down the corridors -- Waipahu, Pearl City, airport, and on down to Waikiki -- because they feel that the older generation and people that, I guess, utilize the bus services use the system more than anyone else and find it hard to accept that the cars will be taken off the street.

I believe that we're affording the University of Hawaii students to have the bigger share of the use of the transit. I feel at this time, because that's the younger generation, they could afford to get on the buses connecting themselves to the University of Hawaii and letting the transit system support the workers of the State of Hawaii and the City and County and various employments, because that's the taxpayers. And here in Kapolei, as I did a lot of grant work and just neighbor-to-neighbor type of projects, I found out a lot of students here didn't go to University of Hawaii; they went elsewhere or just to Leeward College or just went straight to work.

We live in a community down here in the Villages

which is 60, 40 percent affordable, and more affordables will come about. I know some people here in the Villages that work two or three jobs just to make their mortgages and take care of their families. And with everything going up and the cost of our fundamental structures, the sewer systems, the garbage pickups, electricity, water all going up, I find that it's a real hardship, and we should be more supportive of the people that are in the work force here.

In finishing up the work for the neighbor-to-neighbor project, which was funded by several big agencies here in Hawaii, we want to connect the neighbors with each other and find out what their hardships and needs are. I've come to the conclusion that they come home so late, they're so misinformed, and they cannot participate in all this. So, the hardship of this is that when they come home, they get into arguments with their neighbors, find little things to biddy about, and become so built up and pent up with a lot of frustrations going on before they even get home that it's not developing a happy neighborhood. I have a street full of people that are constantly calling saying they cannot interact with their neighbors without realizing that the problem is not your nextdoor neighbor but it's been something else. The hardship of that is that they

were in traffic for, say, an hour, they've had road rage somewhere, and then getting down to the Villages at Kapolei where we're at and getting home and seeing that someone's dog messed their yards up will turn them and make them very angry, or their children aren't at home. It's a mixture of hardships and it's overwhelming, so that people cannot really respond to it at this time because they find it difficult, that maybe they've got the problem or too much misinformation has been given to them from other people without getting here to learn on their own. So, the conflict keeps on being created and they neglect to get to our meetings. And you know what's going to happen; right? They, at the age of retirement, will have to put up with everything that they should have taken care of in the first place; that is, become a good neighbor and become a good citizen by participating as a taxpayer.

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KAPOLEI, HAWAII 96707

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Certified Shorthand Reporter

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Carlson C. P. Look
94-423 Ikepono Street
Waipahu, Hawaii 96797-1619

MR. LOOK: My solution is a multi-faceted solution to the problem with mass transit right now. One, the simplest solution that we can try, why don't we experiment with having a bus-only lane, 24 hours a day, 7 days a week; so, you have a lane that's dedicated to buses only. It would be the exact same thing as mass transit, and we could try that for six months and see how

much people actually ride it. Dedicate that lane all the time. The problem with the monorail, for example, is, if it breaks, how do you fix it? It becomes dead on the line. But say you had a bus-only lane, one car breaks, you could just take it out and swap another one right back in.

Also, the problem with a mass transit system is it stops at certain areas but doesn't allow to go into the neighborhoods. This bus line can break out and still go into the neighborhoods, which people don't have to walk 20 minutes or so. Or if they're elderly, incapable, handicapped, it's really difficult for some people to even walk for 10 minutes let alone. That's my one thing that I want to stress majorly.

And the biggest thing is this eyesore that's going to be in the skyline, if it is above the skyline. It's going to be a 20-mile monument sitting on the skyline all the time for us to see. People don't come to Hawaii to look at another Los Angeles or New York City. They come to Hawaii because of its beaches, because of its people, because of the environment. We don't want to make another major city.

Next thing I have is, these are steps that we can take to help generate money and/or use those monies that are being appropriated. What is it -- is it going

to be, like, $5 billion to make this mass transit system? Or more maybe? One thing I'd like to do is move the City and County, State, Federal workers all to the west side; all the offices move out to this side. I know everybody's going to say the problem being you can't tell people where to live and where to move. Correct. But they're ramming this 5 billion-dollar monorail down our throat, basically, telling us, This is what you're going to have.

Same thing: We should also move the University of Hawaii. There's no reason for it to be where it is in Manoa. Prime real estate. Why does it need to be there?

The medical school, why did it need to be on the waterfront? It doesn't need to be. There's a lot less expensive property here on the west side, where all of that could be.

How do we get the people to go? We offer them tax incentives. We say, You work City and County, you live on the west side, we'll give you a tax incentive.

We also can provide more affordable housing on this side than we can anyplace else. We all know that the growth is happening in this area. It's all on the west side. It's not happening anyplace on the east side, practically; and homes are unaffordable there, anyway.

So, another thing is electric cars. We want to

say that the monorail is going to remove our dependency on oil. So, why not have electric cars? Here's my solution for that, too: Everybody says, Well, an electric car is no good because it can't provide enough people. The problem is now three-fourths of the people on the road are single persons driving in the car. My solution is every single person who has to drive one person in a car has an electric car. He has no other purpose. He's not carrying five people in his car. They now make cars that are in-line cars, like a motorcycle, where two people can ride in it, it has a 500-hundred mile range, and has an average speed -- a top speed of 80 miles per hour. Same thing: We offer tax incentives for people to buy these cars.

Then we have to make the ferry work. The ferry has to work from the west side to the east side. Because if we get the ferry to work, same thing. You can get a ton load of cars from the west side into the east side, to Honolulu, or wherever it may be.

An electric car doesn't need additional infrastructure. An electric car, because it's in-line and small, occupies less space in a lane. Four electric cars can occupy the same space an SUV is occupying now. Also, four electric cars can occupy the same space of a parking stall. So, we don't need to build more roads; we

don't need to build more parking stalls. The electric car will fit, saving oil and environmental concerns.

The problem with living on the west side, a lot of people say, is there's rampant crime. There's not a lot of good places to go, not a lot of housing. We can take a billion dollars, hire more police officers, hire better educators, better teachers, more affordable housing. We have to make it available for everyone on this side so that people will want to come to this side, and it's a safe place to live, a comfortable place to live.

We have to also have a zero-tolerance law, where the HPD says, for example, If you're caught speeding, you're riding the bus; If you're caught without no-fault, you're riding the bus. Anybody who breaks the law more than three times has their license revoked. Because the bottom line is driving is not a right; driving is a privilege. Then you can increase ridership. And we all know how bad it is right now. The courts are so jammed with traffic problems.

Delivery trucks: Deliveries should be made between 10:00 P.M. and 5:00 A.M. There's no reason for them to be delivering during prime-time hours. They don't need to be. Because right now there are a lot of supermarkets, restaurants, supplies are being made during

those hours, thus lessening the flow of traffic on the road. Of course, I know, yes, there are some deliveries that have to be made during the regular hours of the day. But if we make the majority of them take those hours, we take them off the road, as well.

I guess my biggest thing is, if this thing is going to take $5 billion to build -- and that's not including the cost of maintenance -- we could take 3 of that 5 billion. You know how many police officers we could put out there? You know how much money we can pay to education? How much could be made for affordable housing? And on the infrastructure to do it, as well. It's not going to take $3 billion to do that.

It's a hard pill to swallow. Nobody's going to want to do it. But if you offer the general public tax incentives to buy an electric car, tax incentives to move to the west side, move the State -- and we all know it's going to work, because when there's a holiday, there's no traffic on the road. So, you can't tell me it's not going to work. It's going to work. Because if we move half of that population out to this side which is going to that side, you don't have to build this big, ugly eyesore that's on the road 24 hours a day, 7 days a week, where we're looking at this monument. That's going to look horrible. Tourists don't want to see that. I

understand the need for us to get from place to place. But with the solutions I provided -- electric cars; the dedicated lane for the bus line; moving delivery trucks to certain times; a Honolulu Highway Patrol that's always on the road, making sure things are running smoothly -- I'm sure in ten years plus we'd have no problems.

Web Site Comment
www.honolulutransit.org

4/14/2007

FROM:
Maedene Lum
1310 Heulu St. 301
Honolulu, Hawai‘i 96822

COMMENT:
Attended the presentation at McKinley High School. The expense of the project is enormous! Our population numbers do not support the usage. Ridership will not provide revenue to even maintain the project on an annual basis. Taxpayers will be required to subsidize the project to eternity. This system of transportation will bankrupt the city and state!!! We should expand our present bus system--it is more flexible in that services can be reduced/discontinued on routes where ridership is small. What needs to be done at present to increase ridership is advertising and promotion. As an incentive, if a person buys an annual pass, he/she gets one month free! Businesses can provide free gifts to employees who buy bus passes.

Web Site Comment
www.honolulutransit.org

4/13/2007

FROM:
Lawson Teshima
PHT, Inc.
650 Iwilei Road 415
Honolulu, Hawai‘i 96817
lawson@kobay.com, 524-5040x220

COMMENT:
Before a fixed guideway (rail or bus project) is started, cheaper alternatives should be explored that would reduce congestion. One feasible alternative that will cost very little and perhaps increase TheBus ridership is to require that all students (including university, college and trade) be bused to school. No parking should be provided and student passes for use on TheBus should be given in case the student is not on a school bus route.

Web Site Comment
www.honolulutransit.org

4/13/2007

FROM:
Dane Gonsalves
1279 S King St 3
Honolulu, Hawai‘i 96814
alawaiblowfish@yahoo.com

COMMENT:
I feel that building the initial line to salt lake is a waste of time and taxpayers money. I hope the FTA agrees. The entire plan was great the way Mufi's Team originally concieved it. Unfortunatly, Romy Chacola's special interests has other plans and want to turn this project into a joke. Why not shuttle people to the airport from salt lake? Its less than a mile away! Politicial Agendas are polluting this project and its not very cool, considering that we have to pay for it. I say: NO AIRPORT, NO WAY

Web Site Comment
www.honolulutransit.org

4/13/2007

FROM:
Amy Kimura
Hawai‘i 96822
kimura968@yahoo.com,

COMMENT:
Subject: Comments on EIS Scoping on Purpose and Need, Alternatives to be Considered, and Impacts

1) For the record I want to state that I believe the Alternatives Analysis was inadequate in evaluating the three non-Guideway alternatives, especially regarding Express Buses under the No-Build, TSM, and Express-Buses-operating-in-Managed-Lanes alternatives.

2) The Alternatives to be Considered should include buses (I don't know if this would be considered "modes") on the Fixed Guideway. In December the City Council was careful in not specifying that rail be the only mode considered for the Fixed Guideway. At the December 2006 City Council hearing a much traveled tour guide who uses rail on his tours, Dennis Callan, testified that buses exist with a capacity of 300 (three hundred) passengers! I had never heard of or seen such high-capacity buses although I ride public transit wherever I've lived or traveled in the USA, Canada, and Europe. The EIS should thoroughly evaluate such buses as well as other buses for use on the Fixed Guideway, since buses can eliminate one of the major obstacles to using rail, namely the inconvenience and time involved in transferring from feeder bus to rail.

3) Technologies to be considered should include: a) locations where they are in use (city, state/country), b) numbers of stations and average distances between stations, c) number of years at each location they have been used successfully, including (1) numbers of times and (2) lengths of time out of service, (3) costs of maintenance, repairs, and replacement, (4) number of manufacturers of replacement parts and number of years they have been in business, (5) safety records, and (6) security. If they are unmanned, what social impacts would this have on passenger security? That is, could thugs, robbers, and the like begin roaming the cars, intimidating and frightening passengers? Would the homeless find them a comfortable, cool, air-conditioned place to nap, driving away passengers with their body odor or scaring them with their incoherent rantings?

4) How will the Minimum Operating Segment reduce rush hour traffic congestion, probably the major reason Leewardites support it, when UH Manoa is not included? Commuters always remark on how little congestion there is when UHM is not in session. Projected ridership should reflect this drop in expected riders. Moreover, employees and customers of Ala Moana Shopping

Center, the eastern terminus of the MOS, do not contribute to the rush hour congestion, as most of the stores there open at 9:00 a.m. or later, and close well after the evening rush hour.

5) How much less can the Salt Lake alignment reduce rush hour traffic congestion than the Airport alignment when Pearl Harbor and Hickam, two major employment centers, are excluded from the Salt Lake alignment? Incidentally, what are the employee figures from the areas around the Airport during rush hours? (Testimony at the 12/06 hearing indicated that Airport employees do not contribute large numbers to the rush hour congestion because of their hours.)

6) What happens to the alignment if Aloha Stadium relocates? There have been articles about this possibility. Will the City and State keep us apprised during the decision-making process?

7) Projected fares should be realistic. If Vancouver charges $99 Canadian (about $83 US) for monthly adult passes good for rail and buses, is it realistic to claim a combined rail-bus monthly pass in Honolulu would cost the equivalent of the current adult bus pass of $40/month (in 2007 dollars)? If fares need to be higher to pay for the fixed guideway, how would this affect low- and moderate-income riders who have no alternatives? Would this necessitate an increase in the senior bus pass (currently the nation's best bargain at $30/year for free rides 24/7)? Would middle-income riders switch to driving, thereby reducing fare revenue and adding to rush hour congestion?

Thank you, and I look forward to your addressing the concerns raised here.
Aloha, Amy Y. Kimura

Web Site Comment
www.honolulutransit.org

4/12/2007

FROM:
Russell Honma
International Transportation Consultants
P.O. Box 1201
Honolulu, Hawai‘i 96807
russellhonma@yahoo.com, (808) 265-5261

COMMENT:
I would like to state the following comments and recommendation on the Honolulu Rapid Transit Project:

1) The interphasing of the Salt Lake Blvd. transit alignment and the Honolulu Airport (near Kehi Lagoon Blvd). There should be a proposed train station to interphase and intergrade with the Airport People Mover System. Currently the State Department of Transportation, Airports Division is proposing a project for the Airport People Mover System. This way it will accomdate the Honolulu Airport area.

2) When will be the RFP for procument be issued. Can we issue the RFP at the same time as the Final EIS is being inputed. Remember the 1990 project of the Honolulu Rapid Transit Development Project. We had both the RFP issued when we where completing the Final EIS. This way you can start issuing the RFP sometime this summer July - August of 2007. We will not have to wait until 2009/mid., until Final EIS completed.

3) How would the Privitization with the Government (City & State) and the Private Sector be recognized for the development thru the Transit Oriented Development along the transit alignment. Do we need to include it on the RFP Bid and specify those development and what, how those merit be weighted during the evaluation of the RFP Bid.

Please respond to those above questions and if you have any question please E-mail me or call me at 265-5261.

Sincerely yours, Russell Honma International Transportation Consultant State DOT (Retiree)

Web Site Comment
www.honolulutransit.org

4/12/2007

FROM:
Ron Mobley
98-238 Paleo Way
Aiea, Hawai‘i 96701
ronmobley@hawaii.rr.com, 487-8703

COMMENT:
First, let me say that I cannot understand how a project can be approved when much of the required information is missing.

For example, I have repeatedly asked if queuing theory has been applied, and the answer is no.

Second, I ask who will be new riders to the system. Again, I get not answers. Let me respond to the second item first. It appears that the question of ridership is always aimed at those riding the bus. Yet, the purpose is to reduce street traffic. Why then are you not focusing on drivers? If no one switches modes nothing is being accompliched, except overexpinditure of money. The second issue is a measurement of the ridership, drop off points, and bus connections for the drop off points to the riders final destination. The facility size at various mass transit depots needs to be based on rider information. If too many people arrive at improperly sized facilities chaos occurs. Add to this the appropriate bus connections to rapidly remove passengers from the depots. I see nothing in the plans that address these concerns.

Further, the times for travel do not seem to count depot wait times and further distribution to the riders destination. This means the figures are showing incorrect relationships between the various alternatives.

Finally, all costs should also be shown for the consumer, not just governmental expenses. For example, parking at the appropriate depot, riding both el and bus.

Average wait time should also be openly stated.

Web Site Comment
www.honolulutransit.org

4/10/2007

FROM:
Lennard Pepper
1352 Olino St.
Honolulu, Hawai‘i 96818
Pepper002@hawaii.rr.com, 422-1180

COMMENT:
The initial phases of the mass transit discussion appropriately focused on routing and financing. Now, I believe, it is time to look at some of the benefits of mass transit for our citizens, which may be summarized as social benefits or quality of life benefits. For example, I have gotten reaction to my testimony that one of the good things about mass transit is that it will get some of the drunks home safely from the bars. I indicated that the life to be saved might be mine or a council member. This was not intended as a joke. This sort of social benefit needs to be considered as we move forward. That particular example will probably require running the system until two in the morning rather than midnight as currently planned.

Obvious benefits include getting people to and from shopping, health care, and social events. The benefits will be more substantial for the elderly and the disabled, and projections indicate that our communities will be aging long before 2030. Transportation to and from educational and training opportunities is another social benefit that can be expected from the planned mass transit system. Clearly, although UH as a destination is not part of the MOS, UH will be included in the 2030 system. Benefits will accrue not only to students and faculty but also to the Manoa community which is negatively impacted by the current situation. However, UH is not the only educational situation which will profit from the transit system. We will be needing more lifelong education and traing opportunities as our working lives and our leisure and retirement present new challenges and opportunities. Then too, as part of our attempts to improve education for the young, we will probably create more special academies and magnet schools. This will mean that more youngsters will travel away from their neighborhood schools for at least part of their education.

Nobody has a crystal ball which can do a very good job of what things will look like by 2030 and beyond, but we do need to make some best guesses as we move forward. For example, in my community the housing stock is already aged, and changes will have to be made in density and quality. Also , Aloha Stadium will almost certainly be replaced in a diffferent location opening a large area to low and moderate housing. Since futurists have some techniques for prediction, it will probably be wise to include them in the scoping process.

I hope these comments while not exhaustive will be helpful. I will be available for further discussion, and believe that the Neighborhood Board process may also be of use as we move forward.

Lennard J. Pepper 1352 Olino St. Honolulu Hi, 96818 422-1189

Web Site Comment
www.honolulutransit.org

4/10/2007

FROM:
Daniel H.C. Li
1129 Rycroft Street 201
Honolulu, Hawai‘i 96814

COMMENT:
For the proposed rapid transit to work effectively to relieve the current highway traffic jam, the route must be extended from UH Manoa and Waikiki, all the way to Kapolei; and it must have a feeder line to the airport. Otherwise, few riders will choose rail over driving on the already congested surface roads.

Mahalo.

Web Site Comment
www.honolulutransit.org

4/9/2007

FROM:
Marilyn Michaels
Hawai‘i 96815

COMMENT:
I am concerned about asthetics and hope the EIS takes a look at what the transit system will do to the aina and viewplane. I'm particularly concerned about a rail system running down Nimitz near Aloha Tower. That would be a real blight on the waterfront. The system needs to be directed down roads where it'll be hidden by the buildings that already exist, such as down King Street.

The route ought to include UH Manoa, Waikiki, and the airport.

A good feeder bus system, with plenty of park and ride structures in the suburbs, must be a part of the over all plan.

All options should still be considered.

The system needs to be high speed and convenient, plus priced-right, otherwise no one will use it.

Web Site Comment
www.honolulutransit.org

4/5/2007

FROM:
Sara VanDerWerff
545-C Keolu Drive
Kailua, Hawai‘i 96734
sarav@cbpacific.com

COMMENT:
I agree that rail transit is an excellent idea and I support it.

I feel that University of Hawaii should be included and perhaps the airport in the first phase. The airport should be included only if people are allowed to take their check-in and hand luggage on the train.

MOST IMPORTANT: we should NOT have buses going into the neighborhoods to pick up people and transport them to the train station. A much better plan is to provide parking for vehicles at the train stations. One major advantage of that would be to allow people to do errands, pick up children from various locations, etc. Buses are not known for their "on time" schedule and would just cause more congestion.

Thank you for your consideration. I have attended the one transit informational meeting held in the Windward area and have followed the update information since that time.

Web Site Comment
www.honolulutransit.org

4/5/2007

FROM:
Albert del Rio
1245 Maunakea St. 212
Honolulu, Hawai‘i 96817
albert.delrio@hawaiiantel.net, 808-526-3287

COMMENT:
Will a bus oriented system accomodate handivan, tour buses, emergency an enforcement vehicles, and some freight uses? These uses could be enhanced if separtated from the rest of the traffic.

Web Site Comment
www.honolulutransit.org

4/4/2007

FROM:
Brent Kakesako
Harvard University Student
325 Kirkland Mail Center
Cambridge, MA 2138
bkakesako@gmail.com, 808-371-9145

COMMENT:
To whom it may concern, I am a resident of Manoa, a graduate of Iolani School in 2003, and I am currently enrolled in an introductory Environmental Science and Public Poilcy course at Harvard. Our final project requires us to find a policy issue related to the environment that we are interested to study and writing up a final policy proposal. The proposed rail system has intrigued me from its public introduction and I would like to make this the focus of my final paper. However, in order to write something of substance I was wondering if were possible for me to speak with some of the key decision makers to gain more information and perhaps a more focused sense of direction.

thank you, brent

Web Site Comment
www.honolulutransit.org

4/3/2007

FROM:
Harold Lyau
87-156 Hila St.
Waianae, Hawai‘i 96792
hal0954@aol.com, 808-696-4047

COMMENT:
I can only imagine what Oahu's vehicle traffic will be in the next 10-15 years in the future..... H1, H2, a virtual PARKING LOT ! Build the mass transit rail system that will benefit West Oahu as the second city population will expand Ten-Fold in that time frame. People will use the Rail System because NO ONE WANTS TO SIT IN A VIRTUAL PARKING LOT...due to massive gridlock.

Web Site Comment
www.honolulutransit.org

3/30/2007

FROM:
Susan Miller
Pacific Altelier
737 Bishop Street 0
Honolulu, Hawai‘i 96813
orinsbyandco@yahoo.com, 808.533.3688x203

COMMENT:
Zoning of transit stations will be a vulnerable area in the Project's implementation.

Web Site Comment
www.honolulutransit.org

3/31/2007

FROM:
RYAN STRINGFELLOW
24320 143RD AVE SE
SNOHOMISH, WA 98296
lokelanis@prodigy.net, 425-750-0259

COMMENT:
As a former resident and future resident when I return to spend my retirement years at home in Hawaii, I am very excited to see progress being made towards an elevated mass transit system. I am a graduate of MPI and the University of Hawaii at Manoa.

I am very concerned with the last minute route change through Salt Lake. I think that is a mistake based primarily on political leverage. The route running past Pearl Harbor and the Airport would serve many more passengers. From the airport passing downtown, passing near Waikiki and ending up at the UH Manoa campus is clearly the best choice and would serve the most riders.

I presently work for King County Metro Transit in Seattle. I have visited several cities with light rail and can understand how important the choice of route can be towards the success of the project. Build it where people don't want to go and people won't use it.

Please add me to your mailing list.

Thanks, Ryan

Web Site Comment
www.honolulutransit.org

3/30/2007

FROM:
Kellen Kunichika
1317 Moelola Place
Honolulu, Hawai‘i 96819
killerkakashi@yahoo.com, (808)833-7183

COMMENT:
I feeel that the need for this rail most defiantely out ranks the need of beatification of the island as of the reasoning behind the last failed rail atempt. If anything it help to keep the roads nicer and with less pot holes. All in all the rail is a necesity for our econimy because it would lessen the load put on the road.

Web Site Comment
www.honolulutransit.org

3/29/2007

FROM:
Nancy Fleming
5496 Poola Str.
Honolulu, Hawai‘i 96821
flemingn001@hawaii.rr.com, 808-377-8515

COMMENT:
My family, friends, neighbors, coworkers and I really support the proposed ferry. Since the inter island airfares have increased so much in the past few years, all of us are not traveling to the neighbors island to visit family, friends and to vacation. The ferry would enable us to travel reasonably, and take our cars (including sports things and camping things and even our pets). We also think it would be good for visitors to rent one car and be able to travel around the islands on the ferry. Thank you for your consideration. Please instate the ferry.

Web Site Comment
www.honolulutransit.org

3/29/2007

FROM:
Justito Alcon
91-1175 Kaiopua St
Ewa Beach, Hawai‘i 96706
alconj@gmail.com, 808-689-4382

COMMENT:
I have the following comments for the public scoping meeting agenda on 3/28/2007 at Kapolei Hale.

I believe that in the EIS, it should assess the existing site and conditions as a baseline and evaluate the anticipated impacts to the flora, fauna, animal habitat, business impact, homeowner and landowner affected by land acquisition for the project, historical, and social impact. It should include indepth study on the affects to ecology, air, and water quality to ensure long-term sustainable, minimal impact by the project.

The EIS should include the noise impact, energy usage, and maintenance requirements of the technology chosen. Preliminary work has been done by the city based on the different available technologies. They should now be analyzed and evaluated in-depth. The result should give the best choice based on initial cost, maintenance cost, capacity, upgradeability, and operating life.

The EIS should include the best route that least impacts the environment while serving as many people as possible.

The EIS should also address the asthetics of the project without sacrificing cost, effectiveness, and capacity of the project. The termination points should cover main business areas, popular destinations, and high density housing areas. It is to compare the different choices as a means to weight the better choice.

The EIS should include an emphasis on the level of positive impact to commuting as a way to further explain the technologies involved and impact to the environment.

Web Site Comment
www.honolulutransit.org

3/29/2007

FROM:
Joseph Kam
3317 Mooheau Avenue
Honolulu, Hawai‘i 96816
jjkam2002@aol.com

COMMENT:
I believe that you need to futher your research into children's parents of today. Watching and observing any presentations so far; It only covers comments on old people. People who most definitely will be a part of the earth by the time it's done. Alot of the supporters of the current plan won't even be a part of the administration long enough to see it through. Focus of City & County of Honolulu administration is way of course as to the issues that affect us today.

Web Site Comment
www.honolulutransit.org

3/29/2007

FROM:
Jamie Steinhauer
424 Walina St. 22
Honolulu, Hawai‘i 96815
jmaloha@hawaiiantel.net

COMMENT:
It seems to me the money would be better spent on the sewer treatment plant upgrade. The people of Honolulu should not have to pay $300.00 a month. I think priorities are in the wrong place and a lot of people will agree.

Web Site Comment
www.honolulutransit.org

3/29/2007

FROM:
Hale Takazawa
1024 Mauna Place
Honolulu, Hawai‘i 96822
hale@pacificatelier.com, 533-3699x202

COMMENT:
scoping: density and zoning issues within a 1/2 mile radius of train stops should be addressed in the EIS with input from professional and industry organizations in the local community. the expertise from these groups should be tapped at each stage of the planning process to discover best practices for altering the density and zoning requirements with transit oriented design and the creation of walkable communities.

suggestions or recommendations of the EIS scope should investigate the formation of a non-profit think tank funded by a combination of city, a new tranist authority, grants, and professional and industry organizations to serve as the advisory source for implementing planning systems to use best-practices for TOD and walkable communities.

Web Site Comment
www.honolulutransit.org

3/29/2007

FROM:
Enrique Defiesta Jr.
91-1002 A Kanehoalani Street
Kapolei, Hawai‘i 96707
a05defi@hotmail.com

COMMENT:
On March 28, I attended the scope meeting at Kapolei Hale, and was very impressed by the stations, and well knowledged staff. The staff answered all concerns and questions that I had at the time.

At this point, I strongly urge the development to build mass transit, and encourage our lawmakers, council members, and the people of Hawaii to push, and make this happen. We need to follow the example of those states that have Mass Transit, and see how it can be applied and structured into our State of Hawaii. We already have spent to much to examine it. Now, just proceed on the next step. At all cost, we must not waste anymore time. The longer we delay this project, the higher the cost will rise. In other words, Just build it, and they will come. I hope and pray my testimony helps.

Web Site Comment
www.honolulutransit.org

3/29/2007

FROM:
Hawai‘i 96706

COMMENT:
Having the rail going thru Salt Lake is bypassing 3 military bases and the airport, how is that going to help with traffice on the West Side..NOT.

What ever happened to the widening of Fort Weaver, seem like that is no longer a priority. 45 min to drive 5 miles to the freeway is uncalled for, but nothing is ever done, just a bunch of talk.

Web Site Comment
www.honolulutransit.org

3/29/2007

FROM:
Hawai‘i 96782

COMMENT:
How can the public be involved when it is not allowed to vote on this hugh mega expensive project? All the input from Oahu citizens count as zero when the recipient (C&C) controls the comments and can easily ignore what it doesn't want to hear (or deny or refute it as ridiculous/perposterous/lies). Just why are the voters allowed to weigh in so we know officially what the population thinks about spending this amount of money.

Web Site Comment
www.honolulutransit.org

3/28/2007

FROM:
William Stohler
94-530 Lumiauau Street 0
Waipahu, Hawai‘i 96797
benthic@flex.com

COMMENT:
I am an avid supporter of mass transit (light rail or monorail).

I am fervently opposed to the current proposed alignment which excludes the Honolulu airport, Waikiki and UH. Such exclusions will cripple the effectiveness of a system that could largely resolve the island's traffic woes.

That said, I believe that population density and traffic studies should be the basis for route selection. The expectation is that the areas of highest population densities have the highest population of commuters. The selected alignment should serve these areas above all else. While I'd certainly like my neighborhood to be included, the greatest benefit will be achieved by serving the greatest number of users. Engineering, planning and science should be used to select the route, and politics has no place in the process.

At a minimum, I believe the route should begin in Ewa and terminate in Hawaii Kai, with a spur route along the H2 to Milani. Traffic studies should be conducted first, however, to confirm these assumptions.

Web Site Comment
www.honolulutransit.org

3/28/2007

FROM:
Michael Schwartz
Hawai‘i 96821
chingbaby@gmail.com

COMMENT:
I'm in Aina Hina, so this plan will not directly benefit me. However, Hawaii's future is dependent on mass transit for environmentally sustainable economic growth. Please move forward as soon as possible.

Future expansion of the system is also important.

Web Site Comment
www.honolulutransit.org

3/28/2007

FROM:
Luana Bass
POB 835
Kaneohe, Hawai‘i 96744
sxyslmb@yahoo.com, (808) 753-3636

COMMENT:
In strong support of having this option of travel available to us.

Web Site Comment
www.honolulutransit.org

3/28/2007

FROM:
K. O'Neill
Hawai‘i 96821
koneill@hawaii.rr.com

COMMENT:
Is this a transportation project, or a public works project?

Web Site Comment
www.honolulutransit.org

3/28/2007

FROM:
Donna Ching
2212-A Wilder Ave
Honolulu, Hawai‘i 96822
dlching@aol.com, 944-4070

COMMENT:
Rail will not relieve congestion or improve commuting woes.

The cost estimates are misleading given that construction escalation alone is 10%/year, compounding. And what about the operating costs and annual deficit? Where are those numbers?

The route and type of rail being proposed will not serve enough people to generate ridership.

No one except those consultants and contractors who will personally profit thinks this project is a good idea.

If we were serious about getting people out of their cars, reducing traffic and commute times, we could do so tomorrow with changes to: gas prices/taxes, parking subsidies for civil servants, operating hours of UH-Manoa, mandatory staggered shift hours for public employees, incentives to businesses to relocate outside downtown Honolulu, tolls, radically expanded bus fleet, bus-only streets and zones, high speed lanes, and a myriad of other steps.

The proposed rail system and route is a political and financial boondoggle which does not solve the root problem of congestion.

PLEASE do not saddle taxpayers with this white elephant!!

Web Site Comment
www.honolulutransit.org

3/28/2007

FROM:
Christian Seckinger
91-1023 Kaikahola St
Ewa Beach, Hawai‘i 33967
seckderr@aol.com, 808-232-4760

COMMENT:
I think this is a great plan and would especially help the Ewa Beach area. My concern would be that the transit system falls short of part of its goals and does not include portions of Ewa Beach close to and on the Beach. This area tax base may not be as high as other areas but the population and future growth would benefit greatly. The access in this area should be direct access to the train system.

Thank you.

Web Site Comment
www.honolulutransit.org

3/27/2007

FROM:
Toni Baran
A #1 Hawaii Weddings
44-160 Kou Pl. #2 2
Kaneohe, Hawai‘i 96744
lovehawaii@hawaii.rr.com, 235-6966

COMMENT:
I am totally against the new rail system. I like the letter to the editor suggesting more school buses will ease traffic at a much lower cost to the taxpayer.

Web Site Comment
www.honolulutransit.org

3/26/2007

FROM:
Michael Lilly
707 Richards St. 700
Honolulu, Hawai‘i 96813
Michael@nljlaw.com, 808-528-1100x19

COMMENT:
1. I oppose this complete waste of money.

2. If you are going to build it, it is ridiculous to bypass the airport!

Web Site Comment
www.honolulutransit.org

3/26/2007

FROM:
Janice Akau
87-407 Manaiakalani Place
Waianae, Hawai‘i 96792
jakau2001@yahoo.com

COMMENT:
I am a regular rider on THEBUS. I would not ride the rail on a regular basis because the BUS gets me to town on a good day in 45 to 50 minutes. Like today being a State Holiday and the Zipper Lane closed, I got on the 93 Express in Nanakuli at 6:12am and got off my bus in town at 6:55am.

The only thing that is hindering the Zipper Lane now during a regular work day is that since you allowed 2 riders to be in the car during peak travel time, 5:30am to 7am, the Zipper Lane does not Zip along like it used to. Please change it to three or more riders during this peak time again, so that we can get to work quickly like we used to. There is the HOV lane right outside of the Zipper Lane to accommodate those cars with two or more people which is not being utilized now or monitored.

Traffic is because there are too many people driving their cars that have only one person in the car. The whole point of having the Zipper lane, riding the bus, and in the future Rail Transit and a Ferry, is to get those people out of their cars (or to carpool) and into these different modes of transportation to get to work.

If you do the transit, make it worth the price, have it start from Kapolei, getting people from Ewa Beach Kapolei, and Makakilo area to get on from there.

The route should go to the Airport, downtown and to University of Manoa.

The buses do a good job now to get everyone around to the other areas.

When the University is out for vacation our traffic is very good. When school starts our traffic gets bad. Doesn't this tell you that having rail going to UH is what will aleviate a lot of traffic?

That's just what I think. Aloha, Janice Akau Leeward Resident

Web Site Comment
www.honolulutransit.org

3/24/2007

FROM:
Leslie Hokyo
55 S Kukui St 1002
Honolulu, Hawai‘i 96813
hokyo@hawaii.rr.com

COMMENT:
I have a comment on alignment that I hope will be considered. The east end of the transit line should go no further than Ala Moana Center. There are two major reasons for this: 1. Shuttle buses can fill the need for transit to UH and Waikiki. These buses would be in addition to the buses that already run between the Center and those to locations. The shuttles can be timed to coincide with the arrival of trains. A good example is the Marguerite Shuttle that runs between the CalTrain station and Stanford University. When you jump of the train, the shuttle bus is there to take you to either the Stanford campus or the huge Stanford Mall nearby. Building rail lines to UH and Waikiki would mean permanent fixtures along the route, with accompanying O&M costs and visual blight. Running shuttle buses is much more flexible, as bus schedules and numbers of buses can easily be adjusted. 2. UH West Oahu will be built up during the same timeframe as rail transit. That means that much of the college age population in Leeward and Central Oahu will be attending classes in Kapolei. As time goes on, the vast majority of UH-Manoa students will be from East Oahu, windward side, and urban Honolulu.

I am neither for nor against rail transit, but if we do proceed with it, let's do it correctly.

Thank you for listening, Leslie Hokyo

Web Site Comment
www.honolulutransit.org

3/24/2007

FROM:
Hondo Mizutani
360 Kamanelo Pl.
Hilo, Hawai‘i 96720
hondo@hawaiiantel.net

COMMENT:
Please have the fixed transit route go through HNL airport! To not have the route go through the airport is unfair to us OUTER ISLAND RESIDENTS who also conduct business on OAHU and pay the additional transit tax. It is ridiculous that the local government would decide to build a new mass transit system that bypasses the airport. This would be not only a huge disservice to OUTER ISLAND RESIDENTS who own businesses on OAHU and pay the transit tax, but also a disservice to the thousands of people who pass throught the airport daily. As a Big Island resident who conducts business on Oahu and will pay the transit tax, if the route does not go throught the airport, I will be forced to continue renting a car during my frequent trips to Oahu, and I think most of us Outer Island Residents travelling to Oahu will continue renting a car if the transit bypasses the airport. This decision may be the ultimate factor in whether or not the transit project will succeed or fail in the future. It seems that common sense will point-out that the government should consider every advantage to the ultimate success in this risky, controversial and yet needed program.

With sincerety, Hondo Mizutani

Web Site Comment
www.honolulutransit.org

3/18/2007

FROM:
Jim Kennedy
91-1012 Kaipalaoa St. 0
Ewa Beach, Hawai‘i 96706
indyjimk@hawaii.rr.com, 808-689-7963

COMMENT:
I realize that the actual form of vehicles (trains or other) to be used has not beem determined. But every artist rendering or picture I see shows only two or three rail cars hooked together. I have even seen single cars. That will not work!!! Successful rapid transit systems for huge popluation centers require up to ten cars hooked together. Carrying about 100 people each, a ten car train will carry 1,000 people. These even have to run about five minutes apart. That means in one hour 12,000 people will be moved. In two hours that works out to 24,000 people. That means getting 20000+ cars off the roadways. That would be great. I should know because I lived in the San Francisco area for 14 years before retiring back here last year.

Where can I get information on the kinds of cars or trains that are being considered?

Thank you, Jim Kennedy Ewa Beach

Web Site Comment
www.honolulutransit.org

3/18/2007

FROM:
G.P.K. Ah Yat
1065 Kawaiahao St. 1803
Honolulu, Hawai‘i 96814
hawaiiansoul88@gmail.com, 597-8921

COMMENT:
1) I don't like the idea of not servicing: Pearl Harbor, the airport or the Nimitz Hwy. I feel that Salt Lake was a political move that will benefit Council member Cachola (possibly land and financial reasons). If the route is going to Waikiki, then wouldn't it benefit those in the industry most important to us, the visitors? Why can't it go to the Kahala area, so maybe it will help our East side?

2) What will fuel the transit system? Gas, electric or what? With the cost of fuel rising, how will we control the increase in operations cost in the future? If it's electric, what will happen in the event of an island wide blackout? Or even just in the area of the route? What will be our backup system in any event? If it's going to be managed like The Bus system, then IT WILL BE a losing venture to invest even a cent into.

3) I don't think WE should jump into something so expensive that WE WILL REGRET later!!!

Mahalo.

Honolulu High-Capacity Transit Corridor Project

4-3-07

Welcome to the Honolulu High-Capacity Transit Corridor Project scoping meetings.

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Name: THOMAS J. STROUT

Address: 871-5 ALA LILIHOI ST. HON., HI. 96818

Phone: (808) 255-8274

E-mail: TOMSTROUT@MSN.COM

Comments:

I WOULD LIKE TO SEE MORE STOPS (ATLEAST 3 OR 4) ALONG THE SALT LAKE BLVD (ALA NIOI ST.) IS NOT A VERY GOOD SITE + WOULD NOT BENEFIT THE MAPUNAPUNA DISTRICT. I WOULD LIKE TO SEE A STOP IN THE AREA OF RADFORD DR./LIKINI PL. ~~[illegible]~~ WHICH COULD SERVICE THE CONDOS OF SALT LAKE, MILITARY HOUSING @ MOANALOA TERRACE, RESIDENTS OF ALIAMANU. BY PUTTING A STOP ON AHUA ST. + SALT LAKE BLVD WOULD SERVICE THE RESIDENTS ON

THE D.HEAD SIDE OF SALT LAKE, WORKERS IN MAPUNAPUNA, + EMPLOYEES OF FT. SHAFTER. POSSIBLY LOOK @ THE AREA BETWEEN RADFORD H.S. & PAKINI ST. OR EVEN MALUNA ST. TO FEED FOSTER VILLAGE + EWA END OF ALIAMANU AREA + THE MILITARY HOUSING + NEX SHOPPING CENTER

---------- FOLD ----------

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Name: Norman Sakamoto Address: State Cap #230 Hon 96813

Phone: 586-0585

E-mail: nsusakamoto@capitol.hawaii.gov

Comments:

Based on the comments from area residents and my own analysis, the Salt Lake route is a good choice. This will provide ~~total~~ residents of the community the opportunity to directly access the rail line. If an additional station was located at the Mapunapuna/Punawa Blvd end of Salt Lake Blvd more residents and workers would utilize the line

Honolulu High-Capacity Transit Corridor Project

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Name: Terry Haynes Address: 91-1468 Renton Rd #8

Ewa Bch HI 96706

Phone: _____

E-mail: Haynesteez@Hawaii.rr.com

Comments:

Being a Low Income Senior as many are in the Ewa/Kapolei area, We Desperately need this Rail for a Smoother Ride to Town. The Bus is great for Local Traffic/short Rides. But the Bus Ride to Downtown is Miserably Crowded, Bumpy, etc. Thanks (Mahalo) For getting this project Approved.

Aloha Nui Loa.

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Name: TED KANEMORI Address: 46-066 HEEIA ST.

Phone: 247-3993 KANEOHE, HI 96744

E-mail: ted@hisurf.com

Comments: I take issue with the fact that the AIRPORT WAS EXT. From comments that I have read about, the majority of city council members agree that this "route" is not the best solution but we will spend the 5->10? billion dollars. The mayor says that this is not the "route" of choice but we are going to spend the 5->10? billion dollars. This is not the route of choice but a "political" choice, and we will spend the 5->10? billion dollars.
Yet, it's expected that the public will ex

Pay for this project and "support??" this political shenanigence??

I supported the project (and to some extent, still do) up till the time when our city council started playing these political games.

There's too much money involved to "play games".

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Name: P. Higa

Address: POB 2845
Aiea 96701

Phone:

E-mail:

Comments:

I am totally against fixed rail!
What happed to Mufi's 3 point campaign
rhetoric: Can we afford it??/ Is it needed/Useful,
etc-
I don't agree w/ the "law" of eminent
domain - Are we socialist/communist??
I am so throughly disgusted with so many
I am seriously contemplating relocation!

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Name: Michael L. dela Cruz Address: 1764 Pali Hwy #201 Honolulu HI 96813

Phone: 808 372-3403 Mailg PO Box 37493 Honolulu HI 96837

E-mail: _____

Comments:

1) It would work if you get 70% of car users to have there cars at home, providing their work places is within station steps.

2) It won't work cause the upkeep cost is to high and all we see is tax increases year after year, in an over burdened taxs already.

3) Experts have already stated it will not work, so whom is the Mayor, City Council and Legislators really listening to? The old kick back schemes is it?

4) If it so great for UH, why have they not contri-buted anything to the cost?

5) I am against this mass transit project. Simply for the fact that a better bus system could be used at 1/4 to 1/3 the cost of what is being charged. More buses from Makaha, Kapolei, Ewa Beach, ect, ect, to Honolulu business district would help lesson car use. Many would love to leave cars home if more buses are available to ride in. But somewhere along the line of correspondance between our elected officals and community are lacking. Our voices mean nothing to City Council members and the Mayor. But my vote will count in future.

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Continuation

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Name: Michael L. de la Cruz Address: 1764 Pali Hwy #201 Honolulu HI 96813

Phone: 808 372-8403 Mailing - PO Box 37283 Honolulu HI 96837

E-mail: _____

Comments:

6) There is no purpose for this cause the Kapolei residents will still use there cars - So what is the purpose of having it?

7) The alternatives more buses would work and is more financially realistic.

8) The long term construction is outrageous and would hurt commuters.

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Name: LYNNE BECKSTROM Address: 227 #A AUWALOLIMU ST

Phone: 521-5863 HONOLULU, HI 96813

E-mail: hantayo2002@earthlink.net

Comments:

I have been to one of these community meetings before – at UH Manoa. Mayor Hanneman limited the public input to 20 minutes. He also led UH students to believe that he would be including Manoa in the first project route. This transit plan has been railroaded through with little opportunity for taxpayers to express their opinions. Congestion is just one of many problems we face here in Hawaii. To direct so large an amount of resources to one issue is misguided and possibly disastrous.

03-29-07

Linda Starr
5410 Opihi St.
Honolulu, HI 96821
373-9327 Home #
wailan@hawaii.rr.com

Per Mark please send the published DEIS on CDRom

29 MAR 07

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Name: KEN HARDING Address: 1443-B Kamehameha IV Rd. (Kalihi)

Phone: 843-1841 Honolulu Hi 96819

E-mail: krharding@mac.com

Comments:

① I think it is a big mistake not to include the airport in the system.

② Also, it's a mistake not to include UH/Manoa in the initial phases.

③ I urge greater consideration of fly-over guideways, buses, and the use of high-occupancy toll lanes.

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Name: Kristi Sueoka Address: 1288 Ala Moana Blvd. #8K
Honolulu, HI 96814

Phone: 265-2904

E-mail: ksueoka@gmail.com

Comments:

(1) Ridership: If the project is no faster or less expensive than a car going from home to work, people will continue to drive.

(2) Cost/benefit: the populations that will gain are not currently large enough to justify the cost.

(3) These problems may be ameliorated by chosing a route that includes the areas most commonly traversed by a ~~Right~~ largest group of residents & tourists.

(4) ~~Time~~ Time needs to be an accounting for delays in the planning process. Once a construction set of bones are found, the project will be delayed in that site.

(5) Transfers must be convenient, accesible, and quick. Park and ride also must follow those standards.

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Name: IRWIN SILVER Address: MAKIKI

Phone: _____ _____

E-mail: _____ _____

Comments:

HONOLULU ALREADY HAS AN AWARD WINNING (BEST IN US) PUBLIC TRANSIT SYSTEM - THE BUS. THERE IS NO NEED FOR A RAIL SYSTEM. THE BUS SYSTEM CAN BE EXPANDED AND IMPROVED WITH MORE BUSES, MORE FREQUENT SCHEDULES (EVERY 10 MINUTES) 24 HOUR SERVICE TO ACCOMODATE NIGHT & RESIDUENT NIGHT WORKERS, MORE COMFORTABLE BUSES WITH CUSHIONED SEATS EXPANDED ROUTES. RAIL'S BIGGEST OBJECT OF RELIEVING TRAFFIC CONGESTION COULD

THEY BE ACCOMPLISHED WITHOUT THE HUGE PUBLIC DEBT BURDENS DISLOCATIONS OF HOMES UNDUE SEIZURE OF PRIVATE PROPERTY & THE INEVITABLE TRAFFIC DISRUPTIONS THAT RAIL CONSTRUCTION WILL ENTAIL. THE OSTENSIBLE GOALS OF RAIL ADVOCATES IS TO BE TO GIVE THE ONE PASSENGER CAR COMMUTER A BREAK (LESS TRAFFIC) RATHER THAN TO GET THESE DRIVERS OFF THE ROAD & ~~INTO~~ ON TO PUBLIC TRANSIT. TRAFFIC CONGESTION CAN BE ALLEVIATED BY THAT OTHER WAY. THE CAR IS THE PROBLEM. TRANSIT POLICY SHOULD NOT BE DIRECTED TOWARDS ENDORSE ITS CONTINUED DESTRUCTIVE USE THE BUS IS HERE. THE BUS IS THE ANSWER. LET'S START US ON THE PATH.

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Name: Howard M Shima Address: 1030 Ala Kapua Pl. Honolulu HI 96818

Phone: 839-5759

E-mail: HowardShima@HawaiianTel.Net

Comments:

Salt Lake Blvd Alignment:

① There are only 2 stations. Should have one more between proposed two.

② One station should be at Ala Likikai near Library as shown in photo (*). Is it possible to then build a two story parking structure at the present on grade parking lot to service Library and School people as well as transit patrons.

Ala Likikai can be extended for all to drive directly into parking structure

(*) Visual/Aesthetic Sources Board (over)

Most stations don't have parking. I travel to Bay Area and have taken BART many times. At almost all stations, parking is provided. I can get land Condoming land will be expensive but to achieve good ridership, DTS should look into providing some parking at stations.

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Name: Gordon Trimble Address: 1350 Ala Moana #812
Honolulu HI 96814

Phone: 593 9015

E-mail: _____

Comments:

System to speed buses with on & off ramps. Transit vehicles should accomodate segways & electric chairs on wheels. Entire length needs to be off grade with transfers from one bus to another off grade.

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Name: Donald Lubitz

Address: 2679 Peter St. Honolulu HI 96816

Phone: 732-1232

E-mail:

Comments:

I was hoping there would be some presentation of audience commenting as with the time I attended last year. What those who say "just add more buses" etc. do not consider is HOW DO BUSES EVEN GET THROUGH as I have counted a couple dozen buses backed up bumper to bumper trying to get to the King/Punchbowl Bus Stop. I mentioned this count to one of the drivers several days later and he said

"I know I have been in these lines." Just add toll road to get in FASTER does not. ADD MORE ROADS or PARKING DOWNTOWN. The ROADS can HANDLE only so many CARS (Downtown Streets). How will there be MORE PARKING if MORE CARS COME IN? I never hear Cliff Slater address that reality. Also, BUS ROUTES ENDING (LAST RUN) at 10:00 pm does not allow time to see a movie or Hon. Theater Program then get to the #14 ROUTE BEFORE the last Bus goes up to the top to come back down at 10:05. Also, no shelter ran shields (roofs) at many stops (or even a bench). At a certain population on wheels a NARROW CORRIDOR I see no alternative to some FIXED RAIL OPTION of some form. We can't JUST IGNORE THE "WHAT TO DO WITH ALL THE CARS WHEN THE GET INTO TOWN

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FASTER and THEN JAM UP THE BUSES SO THEY TOO CAN'T GET THROUGH.

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Honolulu High-Capacity Transit Corridor Project

03-29-07

Welcome to the Honolulu High-Capacity Transit Corridor Project scoping meetings.

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Name: DAISY MURAI Address: 3039 Kaunaoa St

Phone: ______ Honolulu HI 96815

E-mail: ______

Comments:

Question - what happens when the TRANSIT Lines of the MOS are completed in 2012 bringing in people from the Leeward area & Kapolei & surrounding into the primary urban center (PUC) & Downtown/Ala Moana Center - the same time should the Land Use ORDINANCE change to allow maximum height variance for maximum population-density growth. within the primary urban Center. ~~causing~~ a ~~[illegible]~~ creating double jeopardy of bringing in more people into the Densily populated PUC. - over

Currently the City & County of Honolulu has passed resolution - 06-369 to allow maximum density in the PUC. This is in addition to the transit Stations / Centers - which could allow housing within the complex. - How would people be able to travel without traffic gridlock with in the PUC? - even with the Transit. I feel this would defeat the purpose of traffic flow. for all everyone.

FOLD

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Name: Claire Tamamoto Address: 99-210 Halimanu Pl.

Phone: 486-0285 Aiea, HI 96701

E-mail: clairet@hawaii.rr.com

Comments:

- Oahu has demonstrated its need for a ~~a~~ high capacity mass transit system based on documented commute times, congestion + the potential project development.
- What form shall it take + where shall it go... I hope technology + planners will select the smallest yet safest footprint possible. The route selected is along our shoreline + through some of our most richest resources (wetlands) Proposed TOD's should be respectful of these natural resources and green/open spaces.
- The airport route through the work centers of Hideam + Pearl Harbor should be revisited. Ridership to those areas / destinations are

perfect fits for a transit system. You want ridership that has daily + single stop destinations. This will allow for streamlining of the route, stops + frequency.

Also, in considering mode of technology ... take into consideration alignment + the least obtrusive mode to view planes + least amount of noise/dust

- FOLD -

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Name: C Kawi Jocharoen Amsterdam Address: 1415 Pensacola St. #12 Honolulu, HI 96822

Phone: 808-550-4994

E-mail: charles.amsterdam@hawaiiantel.net

Comments:

Presently this Project appears unnecessary and takes funds greatly needed for other more important needs. Native Hawaiian needs are also overlooked. This rapid transit system is needed about as much as Oahu needs a full service airport like the Honolulu Internat'l Airport in Haleiwa to have 747s traffic from the Honolulu Int'l Airport. Although innovative, I think presently funds could be better used to meet other needs such as education, health, the Hawaiian Kingdom, culture, housing, etc. than this rapid transit system. Aloha.

Honolulu High-Capacity Transit Corridor Project

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Name: Zoe JARVIS Address: _____

Phone: 696-3396 _____

E-mail: _____ _____

Comments:

Great to pass something however, may it be noted that with park + ride by the Airport, Salt Lake people could definately go there. Yet people from the airport are not going to Salt Lake. to ride. Too bad ... poor planning on on the part of the council. Did someone bribe someone to get the necessary votes?

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Name: Robyn Brown Address: WAIANAE

Phone: _____

E-mail: _____

Comments:

This should have been done 30 years ago when we could afford it. Let's not wait any longer to get it started. I really should go to the Airport as the Salt Lake People can drive to park at the Airport, but those going to the Airport can't get there from Salt Lake. GET THIS DONE NOW

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Name: Brian Shiro

Address: 91-1031 Kaimalie St Apt 4R3
Ewa Beach, HI 96706

Phone: 265-1415

E-mail: brian.shiro@gmail.com

Comments:

As a long-time rail supporter in cities across the US, I have taken a close interest in the Honolulu High-Capacity Transit Corridor Project. Earlier in the scoping process, I was impressed by your efforts, but now I am not. I can no longer support the project for these reasons:

(1) The alignment bypasses 'Ewa Beach completely in lieu of serving future Horton development instead. Rather than try to address the traffic crisis in 'Ewa Beach by aligning the rail along Fort Weaver Rd, you have instead supported the Big Developers. As an 'Ewa Beach resident (Ocean Pointe) I am outraged by the lack of a "First Project" or "Anticipated

Future Extension" within Ewa Beach proper (along Fort Weaver Rd). Please reconsider at least a future alignment along Geiger Rd to Fort Weaver Rd, or along the Oahu Railway Corridor.

(2) The alignment bypasses the airport. To maximize ridership, the train must serve the airport. Tourists will use it to get to Waikiki, and Kamaaina will use it when we travel.

(3) Waikiki – The "anticipated future extension" in Waikiki must be an integrated part of the "First Project."

(4) U.H Manoa – The "anticipated future extension" to U.H. Manoa is critical for the students, employees and visitors to the University. It will vastly help alleviate traffic problems during athletic events, for example... FOLD - This must be part of the "First Project".

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(5) The cost of the Honolulu High-Capacity Transit Corridor Project is so high and the taxpayer burden so great, that I can only support it if I know it will be useful. Ridership must be maximized by serving Ewa Beach, the Airport, Waikiki, and U.H. Manoa.

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