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Seeking cost-effective ways to improve Honolulu's traffic congestion

Comments on the Alternatives Analysis 'purpose and needs' statement

The City and County of Honolulu is presently in the NEPA process and is preparing an Environmental Impact Statement (EIS) per the Federal Transit Administration's (FTA) Notice of Intent (NOI) in the Federal Register [FR Doc. 05-23678 Filed 12-6-05].

In preparing the Alternatives Analysis (AA) purpose and need statement, the City has,

1. Failed to inform the public of the importance of the purpose and needs statement in the EIS process.
2. Not provided "a clear statement of the objectives that the proposed action is intended to achieve ..." and has confused the public with the language used in the purpose and needs statement.

Statute

The SAFETEA-LU statute requires that "the lead agency shall provide an opportunity for involvement by ... the public in defining the purpose and need for a project." And that the resulting "statement of purpose and need shall include a clear statement of the objectives that the proposed action is intended to achieve ..." (emphasis added) SAFETEA-LU H.R.3. Sec. 6002.ⁱ

Final guidance

The [Sec. 6002 final guidance](#) contains the following:

SAFETEA-LU specifies that the lead agencies also must give the public the opportunity for involvement during the development of the purpose and need statement and the identification of the range of alternatives to be considered. Prior to SAFETEA-LU, the public scoping process typically included these elements of a NEPA review, but there was no explicit Federal requirement to provide an opportunity for public involvement on purpose and need and on the range of alternatives in advance of the draft environmental impact statement (DEIS). p. 9

The lead agencies must perform the functions that they have traditionally performed in preparing an EIS in accordance with [23 CFR part 771](#) and [40 CFR parts 1500-1508](#). In addition, the lead agencies now must identify and involve participating agencies; develop coordination plans; provide opportunities for public and participating agency involvement in defining the purpose and need ... p. 17.

In developing the statement of purpose and need, the lead agencies must provide opportunities for the involvement of participating agencies and the public and must consider the input provided by these groups. After considering this input, the lead agencies will decide the project's purpose and need. If the lead agencies do not agree, they must work out their differences because progress on stating the project's purpose and need, and other activities that depend on the statement of purpose and need will be stalled until the lead agencies agree. p. 23

Process history

In the NEPA process so far there have been three relevant documents produced since the NOI issued:

- The December 2005 Scoping Document
- The Draft Oahu Regional Transportation Plan (Draft ORTP)
- The Alternatives Analysis (AA)

The Scoping Document

The Scoping Document says,

“The purpose of the ... Project is to provide improved person-mobility in the highly congested east-west corridor between Kapolei and UH Manoa ... The Project would also provide an alternative to private automobile travel.”

The document then details how bad the traffic congestion is and, for the unwary, there is an implication that rail transit will reduce it.

At the time, we formally commented:

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 [Metropolitan Statistical Area] MSA has managed to reduce the market share of commuters using automobiles.^{ix}

Draft ORTP

The Draft ORTP details how bad traffic congestion will be if we do not “build new transportation facilities” — meaning rail transit:

“As we continue to grow, more people and more employment opportunities mean more and more traffic: more clogged roads and more delays getting to work, school, stores, and the beach. As an illustration of how congested the transportation system could become, a “Baseline 2030” analysis was conducted to estimate future traffic conditions if growth is allowed to occur but no new transportation facilities are built. The figure above shows significantly congested locations on Oahu during the morning peak period in the Baseline 2030 analysis.

The impact of the congested roadways corresponds to increases in travel time for all Oahu residents, huge increases for some depending on where they live and work. The figure below shows the projected travel time from each area on Oahu to downtown Honolulu for the Baseline 2030 if nothing is done. It can be seen that travel times in excess of 80 minutes are projected from Ewa, Central Oahu, and the Waianae Coast to downtown Honolulu during the morning peak period. This can be attributed to the growth targeted for these areas.” p. 3.

Then the Draft ignores the effects of traffic congestion if the city builds rail (even if Draft projections were to be realized):

“The projects included in the transportation Draft propose numerous ways to address the additional traffic congestion that is expected to increase along this travel corridor:

At the heart of the ORTP 2030 is a rail transit system that will serve the corridor between Kapolei and Honolulu.

... The [Oahu Regional Transportation Plan (ORTP)] will advance us toward the vision for addressing growth and traffic on Oahu for 2030.” p. 4.

And,

“... the analysis indicates that the Draft would:

reduce the number of miles and hours spent by people in automobiles to make trips; reduce delays for all modes of travel; and significantly increase public transit ridership.” p. 6.

And,

“The number of congested roadways are forecast to decrease.” p. 11.

We also note that the Oahu Metropolitan Planning Organization's (OMPO) Guide to Public Involvement (<http://www.oahumpo.org/GPI/GPI2002/guide.html> :3.2.4 b). It tasks OMPO to:

Engage the public in the consideration of the purpose and need for a major investment and the development and evaluation of alternatives. The sponsoring or implementing agency shall involve a cross-section of representatives from the affected communities, including low-income and minority communities, when making this assessment. (emphasis added)

OMPO has not done that.

The Alternatives Analysis (AA)

The AA added to the above with language culled from the Scoping Document and the Draft ORTP:

The purpose of the Honolulu High-Capacity Transit Corridor Project is to provide improved mobility for persons traveling in the highly congested east-west transportation corridor between Kapolei and UH Mānoa. System planning for the corridor culminated in the *2030 O'ahu Regional Transportation Plan* (OMPO, 2006a). The O'ahu Metropolitan Planning Organization (OMPO) concluded that the existing transportation infrastructure in this corridor is overburdened handling current levels of travel demand. Motorists experience substantial traffic congestion and delay at most times of the day during both the weekdays and weekends. Currently, transit is caught in the same congestion. As roadways become more congested, they become more susceptible to substantial delays caused by incidents such as traffic accidents or heavy rain. Current travel times are not reliable for either transit or automobile trips. pp. S-1&2.

A failure of process

1. The City and PB has failed to inform the public of the importance of the purpose and needs statement.

It has failed to comply with the federal statute in that it has not sufficiently involved the public as required by law in the development of the purpose and needs statement. It has never informed the public that the purpose and need statement is what the alternatives must be measured against.

"FTA has identified an approach used to support Federal decision-making. 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. The results of both approaches may be presented in the environmental document produced by the study."ⁱⁱ

2. The City and PB have not provided "a clear statement"

"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.*

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 ..."

The language used in the three documents cited here is ambiguous at best, and, at its worst, deliberate deception.

'Improved person-mobility' is not a 'clear statement,' rather it is recent planner jargon and not in any dictionary. It appeared for the first time locally in the proposed 'purpose and needs' statement in the scoping document. It is jargon designed to lull the average citizen into believing that the primary purpose of the Project is to reduce traffic congestion.

If the transportation problem were defined as one of insufficient "person mobility" then one set of alternatives may be preferable, usually focused 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, focused on 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)

The purpose and needs statement is the foundation of corridor transportation planning. The City and PB may have informed the public by using the words, ‘purpose and need,’ but the public has not been ‘involved’ in any reasonable interpretation of the word.

The guidance makes it clear that the public must be involved in the purpose and needs statement “in advance” of the DEIS.

Fails to inform public of intent

The AA fails to inform the public in ‘a clear statement’ that traffic congestion will be far worse after a rail transit line is built.

Beginning with the Scoping Document, followed by the Draft Oahu Regional Transportation Plan (Draft ORTP) and now the Alternatives Analysis (AA), elected officials and transportation officials have led the public to believe that rail transit will relieve congestion.

OMPO planners know what the traffic congestion outcome would really be, as do the City officials, all our elected officials, and the City’s consultant, Parsons Brinckerhoff.

Instead of providing the public with full information on the issue, there is an unspoken conspiracy among them to avoid clearly telling the public the truth — *traffic congestion will get dramatically worse if we build rail transit and do not significantly expand highway capacity.*

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”ⁱⁱⁱ

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 percent increase in the GE tax. Neither the City nor DTS have made any effort to dispel these myths.

Public understanding

The current ‘purpose and need’ statement conflicts with the public’s general understanding that the purpose of the rail transit proposal in the Project Corridor is to reduce the current traffic congestion to a more bearable level.

Abetted by officials

“Further, PB and DTS 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 the AA detail clearly shows that traffic congestion will get significantly worse with the rail transit alternative.
- They relentlessly use the term ‘light’ rail when, in reality, they are pushing a ‘heavy’ rail line.^{iv}
- They imply that the half-percent increase in the county General Excise Tax will be sufficient to pay for rail.^v

Ignores goods

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.^{vi}

Fails to support Congressional intent

The purpose of this guidance is to change this culture, by supporting Congressional intent that statewide and metropolitan transportation planning should be the foundation for highway and transit project decisions. **This guidance was crafted to recognize that transportation planning processes vary across the country. This document provides guidance and information (both conceptually and through some illustrative "current practice" examples) on how information, analysis, and products from transportation planning can be incorporated into and relied upon in NEPA documents under existing laws.** (original emphasis)^{vii}

The state and the city have failed to support the “Congressional intent that statewide and metropolitan transportation planning should be the foundation for highway and transit project decisions.”

OMPO is supposed to have discussed ‘purpose and need’ but has not. The statewide transportation plan contains no mention of ‘purpose and need’ nor does it discuss ‘transportation problems.’

Summary:

This community needs a ‘purpose and needs’ definition of the transportation problem with which everyone can agree and that is without doubt going to be ‘traffic congestion.’

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.”

And rail transit may have some benefits but reducing traffic congestion is not one of them and the public deserves to be told that in plain English.

Prepared by Cliff Slater — rev. 11/21/06

Footnotes:

- i SAFETEA-LU, Sec. 6002.
- ` (f) Purpose and Need-
- ` (1) PARTICIPATION- As early as practicable during the environmental review process, the lead agency shall provide an opportunity for involvement by participating agencies and the public in defining the purpose and need for a project.
- ` (2) DEFINITION- Following participation under paragraph (1), the lead agency shall define the project's purpose and need for purposes of any document which the lead agency is responsible for preparing for the project.
- ` (3) OBJECTIVES- The statement of purpose and need shall include a clear statement of the objectives that the proposed action is intended to achieve, which may include--
- ` (A) achieving a transportation objective identified in an applicable statewide or metropolitan transportation plan;
- ` (B) supporting land use, economic development, or growth objectives established in applicable Federal, State, local, or tribal plans; and
- ` (C) serving national defense, national security, or other national objectives, as established in Federal laws, plans, or policies.
- ii Excerpt from the FTA Evaluation of Evaluation of Alternatives 9.4.3 :
- iii <http://starbulletin.com/2005/12/14/news/story02.html>
<http://the.honoluluadvertiser.com/article/2005/Dec/14/ln/FP512140342.html>
- iv DTS and elected officials continually refer to “light rail” despite constant criticism from us and others.
- v One 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.
- vi Honolulu Advertiser article, December 14, 2005.
- vii [FTA guidance on the linking of planning with NEPA.](#)