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## **Reviewing Oahu's Rail Draft Environmental Impact Statement**

By Panos D. Prevedouros, PhD

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My comments on the City and County of Honolulu's Rail Draft Environmental Impact Statement (DEIS) were reorganized into two posts. This post covers general concerns, and the second covers technical concerns.

My review was based upon the DEIS section 4F dated November 2008 and particularly of chapter three on transportation impacts. Many of my comments refer to the supplementary report "Transportation Technical Report, Honolulu High-Capacity Transit Corridor Project, Prepared for: City and County of Honolulu, 417 pp, August 15, 2008" which includes much more detail and explanations on the traffic and transportation analyses that were the foundation of the results presented in the DEIS.

### **\*DEIS Does not Assess the Impacts of the Project as Defined to the Public**

As described in the Draft EIS, the Locally Preferred Alternative, called the "Full Project," is an approximate 30-mile corridor from Kapolei to the University of Hawaii at Manoa with a connection to Waikiki. However, currently available funding sources are not sufficient to fund the Full Project. Therefore, the focus of the Draft EIS is on the "First Project," a fundable approximately 20-mile section between East Kapolei and Ala Moana Center. The First Project is identified as "the Project" for the purpose of the Draft EIS.

This is a hugely critical simplification and it must be rectified with a Supplemental DEIS. The DEIS should have included both the full project and the 20 mile minimum operating segment or fundable project or whatever the City wishes to call it. The people's understanding is that the rail system is Kapolei to UH with service to Waikiki. The routes beyond the Ala Moana Center are necessary to be assessed in the DEIS. We do not ask the city to assess its mayor's obfuscations of future rail service from Hawaii Kai to Waianae, but the proposal always has been Kapolei to UH.

A Supplemental DEIS is required to assess the impacts for the whole corridor. It is not possible to begin the system, finish it to Ala Moana Center, and when it comes time to expand it, the expansion impacts are such that preclude any expansion.

### **\*Transit Oriented Development (TOD) Potential Was Not Assessed**

A final observation is that people may not realize the unintended consequences around some stations, particularly if they buy property in one of the city's Transit Oriented Development plans. For example, in the Pearl Highlands station, according to the DEIS estimates, over 1,700 vehicles in a day will come to park and take the rail, 300 vehicles will drop

off passengers and over 300 buses will drop off and pick up over 8,000 transfer passengers. That's a lot of traffic, and that's station-only related traffic concentrate of the rush hours and this traffic will be on top of all the (heavy) regular traffic in the area.

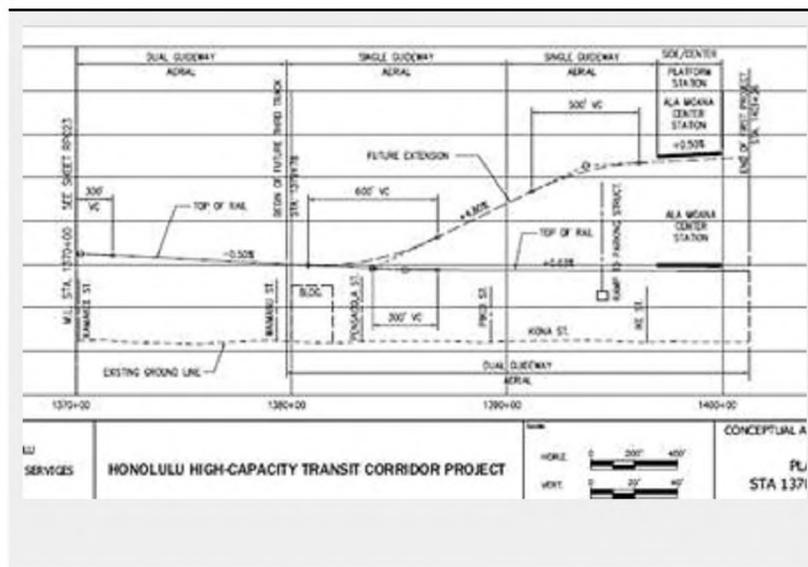
The question then is... What's the impact of station generated traffic, noise and pollution to TOD potential and TOD plans? Where is the discussion and assessment?

**\*Over the H-1 Freeway at University Avenue?**



This author clearly recalls incumbent mayor Hanneman's beating of political opponent Ann Kobayashi for her complaining about the rail guideway going over the H-1 freeway on its way to the UH-Manoa campus. Both City and Hannemann vigorously and rudely disclaimed this in the September to November 2008 time frame but then the City presents this image on the official website as of February 4, 2009. the proposed rail clearly overflies the freeway!

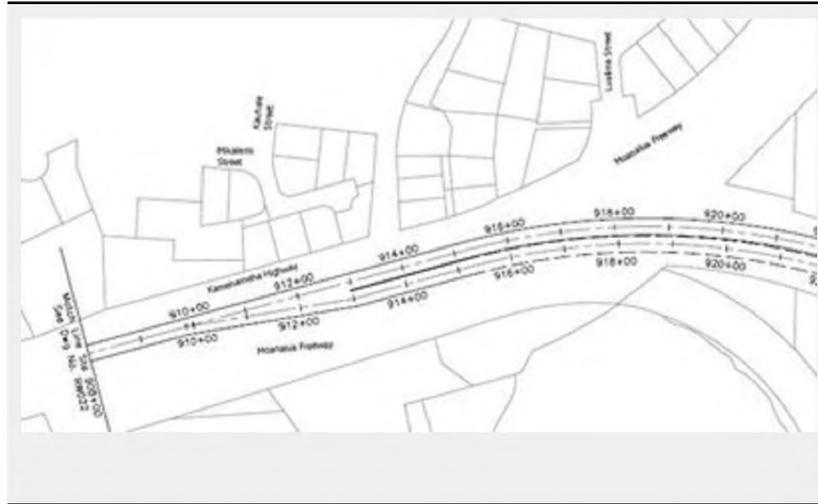
**\*Two Stations at Ala Moana Center?**



The Ala Moana Center station arrangement is a mystery. In the 20 mile plan, the station is approximately at the 3rd floor level. In the 30 mile plan the station is approximately at the 6th floor level. What is the exact plan for the Ala Moana Station and how can the guideway expand past the Ala Moana Center given the density, and height of buildings along Kona Street and Atkinson Drive?

This author suspects that roughly half a billion dollars would need to be expended to reconfigure (that is, to demolish and reconstruct) the guideway alignment between Pensacola Street and Atkinson Drive, including the demolition of the 3rd floor station and the creation of a 6th floor station, if rail has any hope in reaching UH-Manoa or Waikiki via Kona Street.

#### \* Why the Double Track by Aloha Stadium?



There is no explanation for this particularly wide double tracking by Aloha Stadium. What's the purpose, why has it not presented in detail and what is the cost of it?

#### \* OMPO Never Rejected Pearl Harbor Tunnel as Claimed in Table 2-2

The DEIS is wrong in claiming that the Oahu Metropolitan Organization rejected the Pearl Harbor Tunnel. The UH Congestion Study found that this alternative has substantial traffic benefits at a cost comparable to rail's. There has been no substantiation to the tunnels alleged costs between seven and 11 billion dollars. Viable projects should not be excluded through unprofessional conduct such as out of thin air costing and improper project qualification.

#### \*Federal Funding

The Project's cash flow analysis, which is presented in Section 6.4, anticipates the use of Local funds for the first construction phase and a combination of Local and Federal funds for the remaining phases.

The project must not start until the full extent of the federal funding is known in writing as part of the next Transportation Act of Congress, and the project should not start until a substantial portion of the federal funding (e.g., a portion that covers half of the cost of the first construction phase) has been actually released for the project. Anything else is simply reckless public policy.

To refresh our collective memory, the Federal Transit Administration retracted their record on decision (ROD) for Honolulu's 2003 BRT plan because construction along Kuhio and Auahi Streets was started prior to completing the necessary Full Funding Grant Agreement (FFGA). Here the stakes are much higher for the local economy and ground must not be broken until the project gets real federal cash (as opposed to political announcements by Abercrombie, Hannemann and Oberstar.)

#### \*How Will the Rail Cars Go to the Rail Yard?

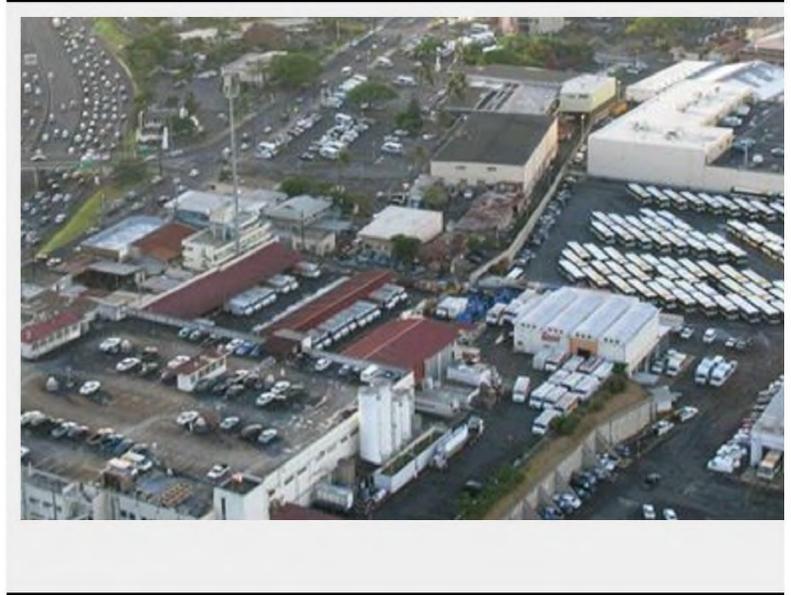
The rail yard is located several miles inland with no direct access to the harbors. Yet the DEIS is silent as to how rail cars and rail equipment will be transported there since rail cars do not fit on regular flatbed trucks and even if they can be accommodated by length and by weight on custom flatbeds, they do not fit by height due to the existence of several overpasses along the freeway. What are the logistics and costs of this significant part of the construction?

#### \* Travel Times by Rail for Political Commercials and for NEPA Documents—Why the Double Standard?

The DEIS clearly specifies that Kapolei-to-downtown travel time by rail is 50 to 54 minutes. This travel time estimate was clearly known in August 2008. Yet in September 2008 the City mailed all residents (using taxpayer funds) a large eight

page brochure, the centerfold of which states that Kapolei to Ala Moana Center by rail will be 40 minutes! (For those unfamiliar with the alignment, the Ala Moana Center is five stations after Downtown.)

#### \* TheBus Inventory



In reference to Table 3-12: 2007 Vehicle Inventory, why is this inventory taken from "National Transit Database, 2007" and not directly from TheBus or the City's Department of Transportation Services transit division that oversees OTS? Why is the total passenger capacity not listed in the table?

At any given time, what percentage of these buses are service ready as opposed to being in repairs or waiting for repairs or parts, or damaged and beyond repair awaiting replacement?

It is my understanding that a lot of buses (about 20%) sit at depots during peak periods and express bus "crush loads" are artificial due to limited scheduling of buses. A case in point is the picture shown above. It was taken at about 6:30 AM on a normal weekday in 2004. The freeway is bumper-to-bumper in the town-bound direction, yet at least 53 buses sit at the depot, many of them articulated (which are typically assigned to the express routes.) How can TheBus "burst at the seams" as a pro-rail commercial claimed in late 2008 when many of the buses sit empty at the depot?

#### \*Unrealistic Fares

To maintain consistency with the travel demand analysis, the actual 2007 average fare of \$0.77 per linked trip was assumed to grow with inflation throughout the forecast period.

So the DEIS assumed that fares are the same as TheBus, which given the cost to build and operate the rail, this means that trips are essentially free to users and the general public pays for it. How can this possibly be reconciled with the Council's desire to cover 30% out of the fare box?

What kind of administrator, engineer and planner does it take to build a five billion dollar transit service and then charge a dollar per ride? I must have this answered so we are able to teach our students this "new math."

#### \*Ho'opili

The EIS for the Ho'opili project analysis for permit application was done by a consultant other than Parsons Brinkerhoff. It shows projected 2030 freeway traffic conditions with and without rail transit. There's no difference; both are level of service F. It is clear that rail or not, traffic conditions along the subject corridor will be terrible. So the City clearly violated the intent of the NEPA process to clearly inform Oahu's citizens that rail is no solution to traffic congestion. We all know that the City used taxpayer money to do promote rail as a solution to congestion.

*Panos D. Prevedourous, PhD is a professor of Traffic Engineering at the University of Hawaii at Manoa. See his blog at <http://www.eng.hawaii.edu/~panos/> or reach him at <mailto:panosdp@gmail.com>*