

Chauncey T. K. Ching
1219 Alewa Drive | Honolulu, HI 96817 | Phone 808.595.4854 | Fax 508.632.0245 | cc@cching.com

February 5, 2009

Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Re: Comments on the Honolulu High-Capacity Transit Corridor Project Draft
Environmental Impact Statement/Section 4(f) Evaluation

Dear Sirs:

I have reviewed the Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement/Section 4(f) Evaluation and offer the following comments. I do so from the perspective of a Honolulu resident and landowner deeply concerned about the current and future quality of life in Honolulu.

Without doubt, traffic and congestion are major issues impacting quality of life in Honolulu. These are not issues that will go away if ignored. However, based on my reading of the draft EIS, I am concerned that there are too many unanswered questions about the High-Capacity Transit Corridor that must be addressed before an informed and wise decision is forthcoming. The long term implications of such a decision are substantial and utmost care must be exercised at this time before committing future generations to decisions that will greatly influence the economic condition of residents, the City, and the State.

First, I am disappointed that the draft EIS was not released at a time that would have benefited the electorate in making choices during the November 4, 2008 election. My understanding based on press coverage is considerably different after I had the opportunity to peruse the draft EIS. For example, from the draft EIS, I learned that what has been analyzed is a corridor from Kapolei to Ala Moana. This is quite different from pre-election descriptions of the system that had corridor service beyond Ala Moana to UH Manoa and Waikiki. The cost and consequences of completing the system to include UH Manoa and Waikiki are not addressed in the draft EIS. We are looking at only

part of the system and can only make an 'act of faith' assumption that the total system can be completed within some unspecified budget. Public policy decisions of the magnitude of the Transit Corridor project cannot be treated so cavalierly. Much more rigor on the cost and consequences of the total system is absolutely essential. How, for instance, will the 40 foot platform at Ala Moana relate to buildings at Ala Moana that have heights well in excess of 40 feet?

Second, I am very concerned that the draft EIS provides insufficient information on the impact of the project on displaced residences and businesses. Instead of a detailed assessment of impacts, the draft simply implies that the impacts are minor or relatively small or limited. These inexact descriptors have no place in a document that is intended to provide unbiased information about a major public policy decision. Again, before informed and wise decisions are forthcoming, much more rigor on impacts on displaced residences and business is necessary.

Third, I am astounded by the estimates provided in Table 3-13 pertaining to daily person trips. In my opinion, the most significant category is 'Trips by Resident.' Under the 'No Build' scenario, transit daily person trips amount to 6% of total daily trips by residents. Under any of the 'build' alternatives, transit daily person trips amount to 7% of total daily trips by residents. The increased ridership with the Corridor project is at best, "underwhelming." I have a most difficult time in justifying how such an underwhelming change in ridership can justify the capital expenditure needed to implement the corridor project.

Finally, I am deeply troubled about planned revenue sources to finance the capital cost of the Corridor project - the General Excise and Use Tax Surcharge and the FTS Section 5309 New Starts program. At the time of the release of the Draft EIS, there were already clear signs that the U.S. and global economy were in a downward spiral that was unprecedented over the past 60-70 years. Today, the economic indicators are both clearer and worse, suggesting that an economic recovery is slow at best; and, federal deficits will be at all time highs for the foreseeable future. These conditions will severely impact both the Excise/Surcharge revenues and Section 5309 New Starts. In short, the revenue sources to cover capital costs are in serious jeopardy and must be considered as policy makers address the very real traffic and congestion issues in Honolulu.

In conclusion, I note that the incomplete nature of the draft EIS, inadequate estimates on the consequences associated with displaced residences and businesses, minimal gains in transit ridership by residents, and likely serious shortfalls in revenue sources for capital expenditures strongly suggest that City policy makers reopen its search for more modest and more effective solutions to the very real traffic and congestion issues we face in Honolulu.

I thank you hearing my concerns and trust that you will do what is best for current and future residents of Honolulu.

Sincerely,

A handwritten signature in black ink, appearing to be 'C. Ching', written in a cursive style.

Chauncey Ching