

29 December, 2008

To:

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Subject: Comment on Draft Environmental Impact Statement (DEIS) “Honolulu High-capacity transit corridor Project”, Issue: The purpose and goals for the Honolulu High-capacity Transit Corridor Project Draft Environmental Impact Statement (DEIS) are not consistent with those of the Oahu Regional Transportation Plan 2030 (ORTP 2030).

Facts:

a) The ORTP 2030 states that its purpose is to provide a **long-term vision document that outlines transportation goals, objectives, and policies for Oahu. The ORTP 2030 goals and objectives are listed in the discussion section below.**

b) **The ORTP 2030 document also identifies specific highway and transit projects that are designed to improve safety, reduce congestion, and increase mobility for Oahu's residents and visitors. This regional planning document is required by a number of state and federal mandates and requirements which include the Transportation Equity Act for the 21st Century ("TEA 21"). These requirements are mandated by the Federal Department of Transportation as a means of verifying the eligibility of metropolitan areas for Federal funds earmarked for surface transportation systems.**

c) **DEIS para. 1.7 states “The purpose of the Honolulu High-capacity Transit corridor is to provide high-capacity rapid transit in the transportation corridor.....as specified in the ORTP 2030.”**

d) **DEIS para. 1.8 – States that there are several needs for transit improvements in the transit corridor: (1) improve corridor mobility, (2) Improve corridor travel reliability, (3) Improve access to planned development to support city policy to develop a second urban center, and (4) Improve transportation equity.**

Discussion:

a) **GOALS AND OBJECTIVES FOR THE 2030 OAHU REGIONAL TRANSPORTATION PLAN, October 2004**
http://oahumpo.org/ortp/media/GoalsObjectives_041022_final.pdf

Transportation Services System Goal:

Develop and maintain Oahu's islandwide transportation system to ensure efficient, safe, convenient and economical movement of people and goods.

Objectives:

- #1 Increase peak-period person-carrying capacities on Oahu's transportation network.
- #2 Provide efficient, convenient and cost-effective transit service to Oahu citizens.
- #3 Encourage the availability of adequate public and private services between Waikiki, the airport and other tourist destinations.
- #4 Promote intermodal efficiency of harbor terminal facilities, airport terminal facilities and land transportation systems.
- #5 Ensure that no person shall, on the grounds of race, color, gender, age, income, disability, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in transportation services as provided for under current federal, state, and local legislation.
- #6 Ensure user and community safety and security in the physical design and operation of transportation facilities.
- #7 Ensure that Oahu's transportation system is planned, designed, constructed and operated in an integrated and cost-effective manner.
- #8 Enhance the performance and efficiency of Oahu's transportation system through the use of operation management strategies, such as Intelligent Transportation System (ITS), Transportation System Management (TSM) and Transportation Demand Management (TDM).
- #9 Enhance the integration and connectivity of the regional transportation system.
- #10 Promote planning, design and construction of transportation facilities and systems to support economic development and vitality.
- #11 Provide major rehabilitation/renewal/modernization of facilities in sufficient magnitude to ensure continued effective operation.

2030 ORTP Planning Study 2 Goals and Objectives

**GOALS AND OBJECTIVES FOR THE 2030 OAHU REGIONAL TRANSPORTATION PLAN
Environment and Quality of Life System Goal:**

Develop and maintain Oahu's transportation system in a manner that maintains environmental quality and community cohesiveness.

Objectives:

- #12 Develop and maintain Oahu's transportation system to meet or exceed noise, air and water quality standards set forth by federal, state and local agencies.
- #13 Encourage energy conservation in transportation.
- #14 Preserve Oahu's cultural integrity and sensitive natural resources, including beaches, scenic beauty, and sea and mountain vistas.
- #15 Develop and maintain alternative transportation facilities, including bikeways, walkways and other environmentally-friendly elements which can be safely integrated with other transport modes.
- #16 Develop a travel demand management system for Oahu that optimizes use of transportation resources by encouraging programs to increase transit ridership, increase ridesharing on Oahu, reduce single occupancy vehicle travel, and reduce auto dependency.
- #17 Minimize disruption of existing neighborhoods from construction of the transportation system.
- #18 Ensure that transportation facility design and maintenance are compatible with the existing and planned physical and social character of new and existing developments.
- #19 Maintain and upgrade existing facilities and design future transportation facilities in a manner that is aesthetically pleasing and incorporates landscaping, tree planting, and public safety.

#20 Develop transportation contingency plans for energy shortages, natural and manmade disasters and other emergencies that would impact the transportation system.

2030 ORTP Planning Study 3 Goals and Objectives

**GOALS AND OBJECTIVES FOR THE 2030 OAHU REGIONAL TRANSPORTATION PLAN
Land Use and Transportation Integration System Goal:**

Develop and maintain Oahu's transportation system in a manner that integrates land use and transportation.

Objectives:

#21 Maintain and develop the transportation system to reinforce Oahu's planned population distribution and land use development policies expressed in the City's Development Plans through coordinated efforts of the public and private sectors.

#22 Encourage innovation in planning, design and maintenance of transportation services and facilities.

#23 Encourage the implementation of land use development policies that support efficient use of the transportation system via reduced vehicular tripmaking and vehicle miles traveled.

b) DEIS purpose stated in paragraph 1.7 is not found in the ORTP goals and objectives listed above.

c) DEIS Needs paragraph 1.8 are not found in the ORTP goals and objectives listed above.

d) The single most important non-compliance of the DEIS with the ORTP 2030 is Objective No. 2 where the ORTP Objective No. 2 is to provide a transportation system that is "COST EFFECTIVE". The reason that Rail is NOT cost effective is that: (1) Rail will cost \$6.8 Billion but will still not eliminate the major H-1 bottlenecks at the H-1/H-2 merge and at the Middle Street merge. In fact, the Rail will increase the vehicular overload on H-1 from the present 11,000 vph to 17,500 vehicles per hour on the 9,500 vph capacity H-1 Freeway at Kaluaao. The rail alternative must be compared with Professor Prevedouros' \$900 million 11 mile, Managed Three-Lane HOV Alternative explained in www.eng.hawaii.edu/~panos/UHCS.pdf. The Managed Three-Lane HOV Alternative eliminates the two H-1 bottlenecks at Pearl City and at Middle Street merge and should be considered "cost effective" by any definition

Conclusion: The purpose and goals for the Honolulu High-capacity Transit Corridor Project Draft Environmental Impact Statement (DEIS) do not conform with ORTP 2030 objective No. 2 with regard to rail being cost effective.

Recommendation: Reinstate the 11 mile Managed Lane HOV Alternative into the DEIS for evaluation as a transit system in terms of cost effectiveness and the potential to eliminate the H-1 bottlenecks at H-1/H-2 merge and at the Middle St. merge.

Respectfully,

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