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SEEKING COST-EFFECTIVE SOLUTIONS TO TRAFFIC CONGESTION

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 comments¹ 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.

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

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.

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

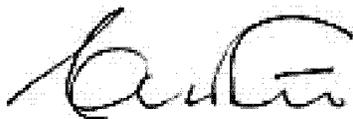
⁹ [US DOT Congestion Primer](#)

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

A handwritten signature in black ink, appearing to read "Cliff Slater". The signature is fluid and cursive, with a large initial "C" and "S".

Cliff Slater, Chair

Atts:

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