

RECORD # 1 DETAILS

Status : In Process
Creation Date : 11/3/2008
Creator Affiliation :
First Name : Darin
Last Name : Miyashiro
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96797
Email : mdarin@gmail.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 11/03/2008
Submission Content/Notes : Suggestion:
To help pay for the maintenance of the rail..billboard
type that can be put on the outside of the trains also at the train stations.
Also, put in flat screen monitors inside ot the train and sell commercial
time and also Public announcements such as "Sunset at the beach,
Taste of Honolulu, Blood Drive, Toys for Tots, UH Football information".
Also, private industry can place their commerical time. You have the
consumer's complete attention on the train for 30 to 45 minutes. Maybe
even free wi-fi.

Lot of potential this TRAIN system!!
Lot of new businesses will be good around the train station!

Aloha
Reply Requested : Yes
Submission Type : Draft EIS Comment
**FOIA (Freedom of
Information Request)
Request :**
FOIA Referral Date :
FOIA Response Date :

RECORD # 4 DETAILS

Status : Action Pending
Creation Date : 11/2/2008
Creator Affiliation :
First Name : Charles
Last Name : Scott
Business/Organization : Citizen
Address : 566 Ahina Street
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96816
Email : cscott@aloha.com
Telephone : 734-3028
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 11/02/2008
Submission Content/Notes : I think it is ridiculous for a city the size of Honolulu to attempt this project- it is too costly for the size of our city. Already, annual property tax collections for the past several years have increased several hundred per cent greater than ability of people to pay (cost of living increase). For example, r.p. tax collections for fiscal year 2007-08 increased 23.4% while cost of living went up 4.9%!!! The three previous years the increases were similar. (Tax Foundation of Hawaii figures). How can we possibly take on the high coast of building & maintaining the rail system???? It is all about City politics and satisfying the unions!!!!
Reply Requested : Yes
Submission Type : Comment/Suggestion
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :
Project Support :

RECORD # 5 DETAILS

Status : Action Completed
Creation Date : 11/2/2008
Creator Affiliation :
First Name : Jane
Last Name : Miho
Business/Organization :
Address : P.O. Box 1719
Apt./Suite No. :
City : Pearl City
State : HI
Zip Code : 96782
Email : janemiho@yahoo.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 11/02/2008
Submission Content/Notes : I am for the Rail. You must show the public the BIG PICTURE. World & National economy is down turning. Good or Bad: 1) If we don't get it now, future price tag will be over \$10B. 2) Rail will curb & help Oahu economy for the next recessionary 5-years. 3) This will create jobs here for the people. This Has to be Advertised Heavily & Promoted. Simple Thought will Sell!!

Reply Requested :
Submission Type : Providing Information
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :
Project Support :

RECORD # 6 DETAILS

Status : Action Completed
Creation Date : 11/2/2008
Creator Affiliation :
First Name : Matthew
Last Name : Toyama
Business/Organization :
Address :
Apt./Suite No. :
City :
State : HI
Zip Code : 96822
Email : Gensuke@hawaii.rr.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 11/02/2008

Submission Content/Notes : Election Day is Coming up and I've taken my time to make my decision. Right now I'm very much against Rail Transit because, based on both Stop Rail and Support Rail advertisements, I believe that the people in charge of the project have no clue what they're really doing.

This mainly stems from the fact that the Support Rail advertisements don't address some of the more serious issues, such as space usage and environmental concerns. All the Support Rail advertisements (As well as their website) really say is "Anti-Rail Protesters are wrong because Rail technology works in Seattle".

After reviewing this site I've gotten a much clearer image of what the Rail project will be like. I approve of the idea of using elevated railways, that being the only practical way I believe it will work. However I am very concerned about how you plan on integrating more eco-friendly alternative energy sources into the project itself.

Many Advertisements claim that Rail will reduce our dependence on foreign oil because it will run on electricity, and claim that it will use solar, wind, and biofuel. However all sources I've been able to locate don't say HOW the alternative energy sources will be integrated.

As this is the case, I must assume that they will not infact be integrated and the rail system will have to rely on HECO who, as I understand it, still generate the majority of Hawaii's Electricity through traditional Oil Burning means. Am I wrong?

I'm also curious as to:

- Why you have not made the specifics about the Rail Technology being considered available to the public.
- How we can be sure that the government is going to promptly enact any promises they make.
- Why you are planning to break ground in 2009, possibly before you are approved to receive funding.
- Where the money is going to come from if construction begins in 2009 and we can only get government funding by 2011.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Yes
Information Request

RECORD # 13 DETAILS

Status : Action Pending
Creation Date : 11/3/2008
Creator Affiliation :
First Name : William
Last Name : Estep
Business/Organization :
Address :
Apt./Suite No. :
City :
State : HI
Zip Code : 96701
Email : dijitul@yahoo.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 11/03/2008

Submission Content/Notes : I am a support of rail even though I will rarely use it. It will take time for ridership to reach its peak given the fact that builders and businesses will adjust to having the rail in Honolulu. However, I see no incentives to ride these public transits, including TheBus, even if they are near me. Sure, it is less expensive, but it's not enough to remind people there are alternative ways of travel.

The City should consider a permit auction or a density compensation fee for new cars arriving in Honolulu. Cars arriving to the islands should be limited or controlled. A limited number of new car permits should be auctioned, and/or fees assessed on each new car sold or arriving in Honolulu. A one-time cost of, say \$500 or \$1000, to each car brought to the islands would encourage resell of existing cars, reduce future traffic growth, and help encourage those living near the rail systems and bus systems to use them and dispersing the number of new cars owned by everyone else.

Reply Requested :
Submission Type : Providing Information
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :
Project Support :

RECORD # 15 DETAILS

Status : Initial Action Needed
Creation Date : 11/3/2008
Creator Affiliation :
First Name : Tony
Last Name : Ho
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96706
Email : tho227@yahoo.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 11/03/2008
Submission Content/Notes : What would be the hours of operations for the rail. How many trains will we be initially start with. Is it a two-way rail or one rail. How many minutes interval during peak hours. What is the speed of the train, how many minutes does it take to go from end to the other? How much is the fare? Will a transit pass good for bus, boat, and rail? Will there be convenient shops planned at each station? Sorry, no time to navigate your site.

These questions are some that are crucial to the success of the rail and I haven't heard anybody talking about them.

I am in favor of rail but how it is the managed and run makes or breaks it.

Thanks,

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 18 DETAILS

Status : Action Pending
Creation Date : 11/3/2008
Creator Affiliation :
First Name : wolfgang
Last Name : neumann
Business/Organization : stop the rail now!!!!
Address : 3222 meleleme pl
Apt./Suite No. :
City : honolulu
State : HI
Zip Code : 96822
Email : wolfneuman@hotmail.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 11/03/2008
Submission Content/Notes : no.no.no,
for rail steel to steel 4-5 billion \$\$\$\$,
operate in 10 years.
it sucks.
vote no!
vote for bimodal 1.5 billion \$\$\$ operate in 3 -4 years.
we need a change for government spending.
regards
wolfgang neumann
Reply Requested : Yes
Submission Type : Comment/Suggestion
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :
Project Support :

RECORD # 21 DETAILS

Status : Initial Action Needed
Creation Date : 11/3/2008
Creator Affiliation :
First Name : ken
Last Name : ikeda
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96720
Email : ken.m.ikeda@gmail.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 11/03/2008

Submission Content/Notes : A couple of questions...your Q&A section estimates 25,000 cars off the road each day due to rail. But the reason the highways are crowded is because everyone has to be in the same area around the same time. So if you can carry 300 people, or 6000 per hour (again from your Q&A section) what about the rest of the people who need to be at work at the same time as those other 6000 people? Don't they still have to drive? so how can you estimate 25,000 cars off the road if only 4000 cars are off the road during the time people need to be travelling to work?

Second question...is it legal to have people vote on a rail system if the eis is provided only a few days before the ballot? If not, then the legal challenge will end up costing more and the vote will need to happen again.

Third (and final for now) question...will the ballot issue be on neighbor island ballots? While the GET increase may have been on Oahu, if you assume that it does not flow to other counties, that is somewhat short-sighted (I hope that is not the extent of the reasoning abilities applied to the rail project). Is the tax increase charged to businesses on the other islands that purchase goods from Oahu? If so then it would seem to be a constitutional issue that could be challenged and again delay the project and or the vote.

(for the record I support the effort to have a rail system although I feel the current model is not feasible. I wonder if anyone in office would like to wager or bet their reputation on whether or not it will actually help by the time it is built?)

thanks...ken

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Yes
Question

RECORD # 24 DETAILS

Status : Initial Action Needed
Creation Date : 11/5/2008
Creator Affiliation :
First Name : RALPH
Last Name : MIRANDA
Business/Organization :
Address : 98-135 KANUKU ST.
Alternative Preference :
Apt./Suite No. : G
City : AIEA
State : HI
Zip Code : 96701
Email : apache007@yahoo.com
Telephone : 808-429-9718
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 11/05/2008
Submission Content/Notes : What is the exact plans/location for the rail in Waimalu area... what areas will be affected... I'm renting right now and if I have to move, don't know where I need to move to... Is there a map that shows exactly where the rail will be placed.. and how much of the zoning will be affected?
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 25 DETAILS

Status : Initial Action Needed
Creation Date : 11/5/2008
Creator Affiliation :
First Name : Jimbo
Last Name : Miura
Business/Organization :
Address : 95060 Kaulua St
Apt./Suite No. :
City : Mililani
State : HI
Zip Code : 96789
Email : jimbo777q@hawaii.rr.com
Telephone : 808-2237717
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 11/05/2008
Submission Content/Notes : Pass to Mayor Hannemann, please reconsider the start of rail construction locations based on this message:

The rail construction should start from the Aloha Stadium to Aloha Tower first so that people can start using this rail system as soon as possible while the rest of the system from the stadium to Kapolei is being completed. Second phase should be from Pearl City to the stadium, then from Kapolei to Pearl City.

First phase, people can park at the stadium and ride the rails from there. Second phase, provide express bus to Pearl City since parking will be a problem.

Being age 70, I sure would like to be alive for a portion of it to be completed and running.

Mahalo, Jimbo Miura

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 27 DETAILS

Status : Action Completed
Creation Date : 11/5/2008
Creator Affiliation :
First Name : Judee
Last Name : Calaro
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96701
Email : judeecalaro@aol.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 11/05/2008
Submission Content/Notes : Can you tell me the exact place for the rails' stop area on Aloha Stadium. I know by now that my house is not affected since I never got any letter saying my house will be bought out. It has been sent out to the affected people already, right?
I live around there, and I am concerned on the impact of the rail, although I support the rail for Oahu. Please advise.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 28 DETAILS

Status : Initial Action Needed
Creation Date : 11/5/2008
Creator Affiliation :
First Name : Giancarlo
Last Name : Legrand
Business/Organization : student
Address : 394 lunalilo home road
Alternative Preference :
Apt./Suite No. :
City : honolulu
State : HI
Zip Code : 96825
Email : spikeyrocke13@yahoo.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 11/05/2008
Submission Content/Notes : will there be monthly passes?

and if so will thebus work with the railtransit as one?
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 31 DETAILS

Status : Action Completed
Creation Date : 11/5/2008
Creator Affiliation :
First Name : Dan
Last Name : Weissmann
Business/Organization :
Address : 3932 Spencer St
Apt./Suite No. :
City : Keller
State : TX
Zip Code : 76248
Email : stripteesh@verizon.net
Telephone : 214-226-4439
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 11/05/2008
Submission Content/Notes : Hi. I am working on a research project and have a question, Can you tell me why you decided not to build your future rail system partially or completely underground? The costs of an elevated system seem to be about the same, and with land at a premium, this at first glance seems like a more logical choice.

Thanks,
Dan

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 33 DETAILS

Status : Initial Action Needed
Creation Date : 11/6/2008
Creator Affiliation :
First Name : Barbara
Last Name : Tom
Business/Organization : Retired _prev w/ State
Address : 753 Kalanipuu St
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96825
Email : bltx59@hawaii.rr.com
Telephone : 395-3903
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 11/06/2008
Submission Content/Notes : Do you really think rail will cost only 4.8 Billion? I expect my grandchildren will pay dearly and will not benefit since they will not be riders and will not work in construction or food service, which I envision to be the main jobs created.

How many City projects have com in on time and in budget? What is the usual cost overrun? Do you expect cost over estimates for Rail?

I voted againt rail because I think it is too costly but I don't know what the answer is to traffic. By the way, I suspect your estimate of the fix to traffic is way over because I don't think rail will ease traffic except in rush hour and only for the residents of Kapolei and Ewa beach - otherwise the train will be empty and there isn't much traffic then anyway.

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 37 DETAILS

Status : Initial Action Needed
Creation Date : 11/10/2008
Creator Affiliation :
First Name : Ginalynn
Last Name : Garces
Business/Organization : Student
Address : 215 n king st
Alternative Preference :
Apt./Suite No. : 1608
City : honolulu
State : HI
Zip Code : 96817
Email : gina08garces@yahoo.com
Telephone : 2067346501
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 11/10/2008
Submission Content/Notes : Hi this is Ginalynn. I had just moved here about a year ago. I have family in Kapolei. At times, I spend the night at family member's house in the westside of Oahu and i feel that something should be done with the traffic in the mornings, it is horrible, the rail in fact is a good start in helping reduce the traffic flow. It takes me about 2 or 3 hours to get to china town in the early mornings.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 40 DETAILS

Status : Initial Action Needed
Creation Date : 11/12/2008
Creator Affiliation :
First Name : Carol
Last Name : Davis
Business/Organization : Retired
Address : 520 Uluoa Street
Alternative Preference :
Apt./Suite No. :
City : Kailua
State : HI
Zip Code : 96734
Email : cjdavis@hawaii.rr.com
Telephone : 262-9867
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 11/12/2008
Submission Content/Notes : I am a retired State worker who is a supporter of rail. When I worked I heard a lot of comments from mothers of young children who said that they didn't ride the bus because they needed their cars in case their children got sick unexpectedly and they needed to get to them quickly. I recently returned from a trip to Washington, D.C. and rode their great Metro system. In their Metro brochure on fares and passes I noticed a "Guaranteed Ride Home" phone number where people can register in advance for a ride home in case of an unexpected personal emergency or unscheduled overtime. Has anything like this been discussed in the planning of the rail system for Honolulu?
Reply Requested : Yes
Submission Type : Providing Information
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 42 DETAILS

Status : Action Completed
Creation Date : 11/12/2008
Creator Affiliation :
First Name : josalyne
Last Name :
Business/Organization :
Address :
Apt./Suite No. :
City :
State : HI
Zip Code : 96814
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 11/12/2008
Submission Content/Notes : I think routing the initial rail line to the Airport instead of through Salt Lake is unwise. I would imagine that riders going to/from the airport would have luggage/baggage, so traveling by rail (or other public transportation) would be cumbersome and difficult, and people would be less willing to take public transportation to the Airport. (For instance, whenever I travel to New York City, Boston, or Washington, DC, I never take the subway/T/metro from the airport because with luggage it is just too much of a hassle!) I believe a route through Salt Lake would be more beneficial initially to service the numerous residents there, and expansions to include the (more expensive) Airport route could be decided at a later time.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD #43 DETAIL

Status : Initial Action Needed
Record Date : 11/12/2008
First Name : Keith
Last Name : Sasaki
Business/Organization : Dependable Hawaiian Express
Address : 1130 N.Nimitz Highway
Apt./Suite No. : C-105
City : Honolulu
State : HI
Zip Code : 96817
Email : keith.sasaki@dhx.com
Telephone : 387-0040
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Submission Content/Notes : I would like like to know if you have already decided on how to bring in the necessary freight to build this project. I work for a major freight forwarder and would be interested in assisting in this venture.
Keith Sasaki
Reply Requested : Yes

RECORD # 44 DETAILS

Status : Initial Action Needed
Creation Date : 11/12/2008
Creator Affiliation :
First Name : Young
Last Name : Kim
Business/Organization :
Address : 94-536 Lumiauau St.
Apt./Suite No. : Apt F102
City : Waipahu
State : HI
Zip Code : 96797
Email : ykim001@hawaii.rr.com
Telephone : 671-2566
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 11/12/2008
Submission Content/Notes : Aloha,

When you look at the route, consider destination rather than origin. Airport, Hickam and Pearl Harbor route has destination and origin without making route changes for buses while Salt Lake route is only the origin. So when the train pulls in to a station with standing room only, would people there ride the train? I doubt that. However, with a bus ride to the airport, they can ride the train comfortably to the destination.

Think about this. What was the primary reason for the mass transit rail? To reduce the traffic from the West side to PUC.

Even though rail was not address in Waipahu Special Area Plan of 1995, I'll support the Airport Route.

Sincerely,

Young Kim, Resident
Waipahu

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :

RECORD # 48 DETAILS

Status : Initial Action Needed
Creation Date : 11/14/2008
Creator Affiliation :
First Name : Emika
Last Name : Celshall
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96701
Email : emikab@yahoo.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 11/14/2008
Submission Content/Notes : Mr. Dacus, of the Mayor's Advisory Committee on Bicycling suggested I ask you this: I very much would like to commute to and from Aiea and Honolulu on my bike. However, it's just not safe to do so; I speak from personal experience. What I'd like to know is, will the Rail route(s) proposed by the Mayor include paths or lanes reserved exclusively for bicycles? I'm not talking about taking a bike on the train, I'm talking about on the road. Will there be space set aside specifically for bicycle use?

Mahalo,
Emika B. Celshall
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 52 DETAILS

Status : Initial Action Needed
Creation Date : 11/15/2008
Creator Affiliation :
First Name : Andrew
Last Name : Le
Business/Organization : 808 Geniuses LLC
Address : 1365 Uila Street
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96818
Email : 808geniuses@gmail.com
Telephone : 808-255-8894
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 11/15/2008
Submission Content/Notes : I was just looking at the rail route from the pdfs on this website and just wanted to know if there were going to be any more public presentations for the rail project. Kind of like the neighborhood meetings they have on OIelo (Ch. 49 on basic cable). My main concern was the current issue to change the route from the Salt Lake route to the Pearl Harbor/Airport route, and I just wanted to voice some concern or see what the reasoning is on both sides of the debate. Basically, I'm all for the airport, but why Pearl Harbor? There's a much larger population to address in the Salt Lake area opposed to Pearl Harbor (and the bus ride from Stadium to Pearl Harbor isn't that long) but at the same time , the airport makes sense once the Waikiki extension is completed.

And how long until the extensions to Manoa and Waikiki are started on/completed?

Thanks, and keep up the great work guys.

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 54 DETAILS

Status : Initial Action Needed
Creation Date : 11/17/2008
Creator Affiliation :
First Name : Dennis
Last Name : Duarte
Business/Organization : self
Address : 1720 Dillingham Blvd
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96817
Email : dennisd002@yahoo.com
Telephone : 808-845-6004
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 11/17/2008
Submission Content/Notes : How will our property located on Dillingham Blvd be affected? Are you expecting to condemn some of our property?
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :
Attachments : CS-54 Dennis Duarte.pdf (8 kb)

RECORD # 55 DETAILS

Status : Initial Action Needed
Creation Date : 11/17/2008
Creator Affiliation :
First Name : Kenneth
Last Name : Yoshida
Business/Organization :
Address : 1516 Hoolehua Street
Apt./Suite No. :
City : Pearl City
State : HI
Zip Code : 96782
Email : kkyoshid@juno.com
Telephone : 808-455-9442
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 11/17/2008
Submission Content/Notes : I have a compromise route which includes part of the Salt Lake and Airport routes.

Have the route continue from Pearl City/Aiea to the Aloha Stadium (park & ride) then onto Bougainville Drive and Radford Drive to the Pearl Harbor Naval Base.

Then onto Nimitz and the Airport.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 58 DETAILS

Status : Initial Action Needed
Creation Date : 11/18/2008
Creator Affiliation :
First Name : michael
Last Name : chu
Business/Organization : LP&D Hawaii
Address : 126 queen street
Apt./Suite No. : 306
City : honolulu
State : HI
Zip Code : 96813
Email : mchu-lpd@hawaii.rr.com
Telephone : 537-4674
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 11/18/2008
Submission Content/Notes : Table 4-1 of the EIS (land use) identifies several hundred acres of extg. land that needs to be "converted to transportation use." What is transportation use? Is that a new land use (i.e. zoning) designation? Is the EIS intended to satisfy land use amendmens where the rail route is not within an extg. right-of-way?
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 61 DETAILS

Status : Initial Action Needed
Creation Date : 11/18/2008
Creator Affiliation :
First Name : Ed
Last Name : Sakai
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code :
Email :
Telephone : 732-6738
Telephone Extension :
Add to Mailing List : None
Submission Method : Other Telephone
Other Submission Method : from Deanna
Submission Date : 11/10/2008
Submission Content/Notes : Recommendation for rail. Please allow other modes onto rail cars bikes (yes) ADA scooters (yes) mopeds (no) segways, dedicate 1 car for these.
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :
FOIA Response Date :
Attachments : CS-61 Ed Saiki - Log.pdf (33 kb)



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
PEARL HARBOR HI 96860-5101

5750
Ser N4/ 00113
12 NOV 2008

DIRECTOR'S OFFICE
DEPARTMENT OF TRANSPORTATION SERVICES

NOV 19 12:52

RECEIVED

CERTIFIED MAIL NO. 7003 1680 0000 7269 2083

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

Dear Mr. Yoshioka:

We recently received a copy of your Historic Resources Technical Report for the Honolulu High-Capacity Transit Corridor Project. We are concerned that the City and County of Honolulu (CCH) has conducted assessments of Navy properties and evaluated said properties for National Register eligibility without Navy input. Accordingly, several of the eligibility determinations listed in the Transit Corridor report conflict with determinations upon which Navy previously received State Historic Preservation Office (SHPO) concurrence. These include both sites and structures on Navy owned property at the former Naval Air Station Barbers Point. We maintain that Navy's National Register for Historic Places (NRHP) eligibility determinations remain valid and that CCH may not revise these determinations on Navy's behalf.

Navy consulted with the SHPO during development of the 1999 Barbers Point Base Realignment and Closure (BRAC) Environmental Impact Statement (EIS) and during the 2002 Ford Island Master Development (FIMD) Programmatic EIS. Through these processes, Navy received concurrence on all Barbers Point NRHP eligibility determinations as documented in these EISs. Surveys conducted during the 1990s including our 1997 Phase I Cultural Resources Survey and Inventory Summary, cultural resource surveys leading up to the 1997 survey, and the Navy's 1999 Cultural Resources Management Plan formed the foundation for these consultations.

As we recently conveyed 499 acres at Barbers Point pursuant to congressional mandate, we are especially interested in the following structures on the 499 acres:

- Quonset huts 1144, 1149, 1150, 1152, 1153, 1562, and 1570
- Facilities 5, 77, 128, 476, 477, and 484

With respect to the Quonset huts, Navy determined these Quonset Huts as "not eligible" for listing on the NRHP. Navy operates under a nationwide Programmatic Memorandum of Agreement (PMOA) for World War

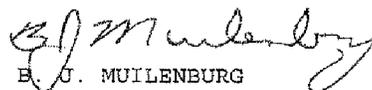
5750
Ser N4/ 00113
12 NOV 2008

II Temporary Buildings. The Advisory Council for Historic Preservation (ACHP) and the National Council of State Historic Preservation Officers (NCSHPO) established conditions and stipulations under which the temporary building demolition program would be carried out for the Department of Defense. The Navy, SHPO, ACHP, National Trust for Historic Preservation, Historic Hawaii Foundation, and the Oahu Council of Hawaiian Civic Clubs subsequently signed a 2003 *Programmatic Agreement Regarding Navy Undertakings in Hawaii* which recognizes the World War II Temporary Buildings PMOA and addresses treatment of these Quonset huts. Specifically, the parties to the 2003 PA will be notified of any adverse action to be taken with respect to these structures, and the Navy agrees to engage in discussions to explore preservation options for these structures.

Navy surveys determined facilities 5, 77, 128, 476, and 477 as "not eligible" for NRHP listing. Navy also considers facility 484 as "not eligible" for NRHP listing because of its association with facility 128 (radio transmitter facility). Navy is unaware of any new information that has surfaced since we received SHPO concurrence on our site evaluations. Only Building 77, which was constructed in 1958, has become 50 years old since our surveys were conducted. Despite its age, Building 77 was originally included in our 1997 survey as part of the Cold War Building Inventory (Appendix B.II in Tuggle and Tomanari-Tuggle 1997 Part I) and was determined ineligible for listing on the NRHP.

We request that you revise your report to reflect Navy's eligibility determinations for the above-listed structures. We plan to review your Historic Resources Technical Report in more detail with respect to all Navy property at the former NAS Barbers Point, and we look forward to receiving your reply related to the 499 acres. We also intend to send separate correspondence on the proposed corridor alternatives as they relate to Navy property and operations. Please contact Mr. John Muraoka, (808) 473-4137 extension 239, if you require additional information related to historic resources.

Sincerely,



B. J. MUIENBURG
Captain, CEC, U.S. Navy
Regional Engineer
By direction of the
Commander

RECORD # 70 DETAILS

Status : Initial Action Needed
Creation Date : 11/19/2008
Creator Affiliation :
First Name : Lyle
Last Name : Cady
Business/Organization :
Address : 300 Wai Nani Way
Apt./Suite No. : 403
City : Honolulu
State : HI
Zip Code : 96815
Email : loudsound_design@hotmail.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 11/19/2008
Submission Content/Notes : I love the idea of a rail transit system on Oahu. However, I feel that the panel members selecting steel wheel on steel rail: Steve Barsony, Ken Knight, Henry Kolesar, Ron Tober, made the wrong choice. Would not a monorail system cost much less and take much less time to build. Monorails are also much safer, heavy rail systems can and do derail. Look up DERAILMENT under your favorite Search engine. You won't find any monorails there. What about Aesthetics? Elevated heavy rail, the guideway casts a wide shadow and blocks out much more of the sky.
YES to a Hawaii rail transit system!
NO to steel on steel!
Reply Requested : Yes
Submission Type : Comment/Suggestion
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 72 DETAILS

Status : Initial Action Needed
Creation Date : 11/20/2008
Creator Affiliation :
First Name :
Last Name :
Business/Organization :
Address :
Alternative Preference : Airport
Apt./Suite No. :
City :
State : HI
Zip Code : 96816
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 11/20/2008
Submission Content/Notes : I believe the rail route should extend to the airport. It doesn't make sense to build the rail if it doesn't include an airport stop. If it's going to (finally) be done, it should be done right. And the state should help finance the project since they will benefit from the rail, especially if it extends to the airport.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 73 DETAILS

Status : Initial Action Needed
Creation Date : 11/20/2008
Creator Affiliation :
First Name : Audrey
Last Name : Barker
Business/Organization :
Address :
Alternative Preference : Airport
Apt./Suite No. :
City :
State : HI
Zip Code : 96815
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 11/20/2008
Submission Content/Notes : I highly support a rail system and the airport route. I think it'll be easier to get tourists to not rent a car and use rail, than to get Salt Lake residents to stop using their car to use rail.

Hawaii is expensive enough to visit, so tourists are trying to cut their vacation costs wherever they can. I see tourists on the bus every morning (while I'm commuting to downtown) heading to the airport of Arizona Memorial or the Swap Meet. These tourists don't want to rent a car and pay \$20/day to park it at their hotel.

I don't think rail should only cater to tourists, but I think tourists will adapt to using the system a lot faster and appreciate it and reward us financially for it. Then hopefully, the residents will get of their own cars and follow!

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 74 DETAILS

Status : Initial Action Needed
Creation Date : 11/20/2008
Creator Affiliation :
First Name : krista
Last Name : groothuis
Business/Organization :
Address : 91-1052 aeae st.
Apt./Suite No. :
City : ewa beach
State : HI
Zip Code : 96706
Email : krista.groothuis@gmail.com
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 11/20/2008
Submission Content/Notes : It is important to route the rail through the airport up to University of Hawaii. As Tourism is one of the largest industries in Hawaii, the rail will reduce traffic and provide transportation for both visitors and residents/employees (of the airport). Also important is to route to UH. As a resident from the Leeward side of the island, I can confirm that traffic is alleviated when school is out of session. Therefore, I SUPPORT THE ROUTE TO THE AIRPORT. I don't believe there's enough demand to travel through Salt Lake.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 76 DETAILS

Status : Initial Action Needed
Creation Date : 11/20/2008
Creator Affiliation :
First Name : Kathleen
Last Name : Fung
Business/Organization :
Address :
Alternative Preference : Airport
Apt./Suite No. :
City :
State : HI
Zip Code : 96816
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 11/20/2008
Submission Content/Notes : I am pro the airport route as opposed to Salt Lake. Having grown up in New York and Connecticut, with rail the primary method of public transportation, I walked to the train station, about 2 miles. It's just easier than driving and finding and paying for parking in New York City. Salt Lake residents can walk, bus, bike or drive to pick up the train at the Lagoon station (be sure there is free parking). We have good weather here! Not sleet, freezing rain and snow. Be smart! Put it where it will get the most use and decrease the most traffic. People will adjust to anything that makes their life cheaper and easier. The Salt Lake residents will adjust to picking up their train a few miles away. Adult commuters where I grew up, took their "station car", a cheap, get around car, 15 - 20 minutes to the station, picked up the train for the 60 minute ride to New York, and walked to their offices. It's what you do when you live or work in a crowded city. We are no different. It's just not yet second nature to us. The airport route has the potential to service a much wider population.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 77 DETAILS

Status : Initial Action Needed
Creation Date : 11/20/2008
Creator Affiliation :
First Name : cameron
Last Name : hamp
Business/Organization :
Address :
Apt./Suite No. :
City :
State : HI
Zip Code : 96789
Email : cameron41085@yahoo.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 11/20/2008
Submission Content/Notes : I have a few questions the first being,

What kind of security will be provided at the parking lots at the rail stops?

If current "road work" creates congestion now, how much more would a full scale project affect traffic? And what hours would the labor be done?

I have seen State "projects" and generally they take 2-3 more years than originally planned and fail to meet the budget consistently. Are there any guarantees that this project timeline would be met?

All of this is built on the assumption that the train would be full? Again are there any guarantees, or incentives to use the train, otherwise I say this, oh someone else is going to take it I can drive. The idea that other people will say will someone else will do it similar to the philosophy of recycling...if i dont do it someone else will.

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 78 DETAILS

Status : Initial Action Needed
Creation Date : 11/20/2008
Creator Affiliation :
First Name : Ken
Last Name : Yoshida
Business/Organization :
Address : 1516 Hoolehua Street
Alternative Preference : Neither
Apt./Suite No. :
City : Pearl City
State : HI
Zip Code : 96782
Email : kkyoshid@juno.com
Telephone : 808-455-9442
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 11/20/2008
Submission Content/Notes : Here is a compromise route.

Have the rail continue from Pearl City/Aiea on the Salt Lake route with a stop at Aloha Stadium (park & ride).

Then onto Bouganville with at stop at the old Costco (park & ride).

Then onto Radford Drive and continue on the airport route with at stop at Pearl Harbor.

I submitted this compromise route on 11/17/08 via email and have yet to receive a response or acknowledgement.

I would appreciate a confirmation when you receive my email.

Mahalo,

Ken Yoshida

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :

RECORD # 79 DETAILS

Status : Initial Action Needed
Creation Date : 11/20/2008
Creator Affiliation :
First Name : Calvin
Last Name : Oshiro
Business/Organization :
Address :
Apt./Suite No. :
City :
State : HI
Zip Code : 96706
Email : calvin@himc.biz
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 11/20/2008
Submission Content/Notes : I believe the rail should go the airport instead of Salt Lake. It just makes more sense. I will use the system when flying off island, but not if I needed to transfer my baggage to another train i.e. if route goes to Salt Lake. The city shouldn't allow one city council member to scew a good thing for the majority.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 80 DETAILS

Status : Initial Action Needed
Creation Date : 11/20/2008
Creator Affiliation :
First Name : Richard
Last Name : Mori
Business/Organization :
Address : 94 742 Kaaka Street
Apt./Suite No. :
City : Waipahu
State : HI
Zip Code : 96797
Email : supa8hi@gmail.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 11/20/2008
Submission Content/Notes : In the DEIS it indicates that the rail will have drivers in the trains. They should be fully automated to save on Operations and Maintenance. This will only cost more in overall operations and the City will have to find new funding sources if you keep adding more overhead to the project.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 81 DETAILS

Status : Initial Action Needed
Creation Date : 11/20/2008
Creator Affiliation :
First Name :
Last Name :
Business/Organization :
Address :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96815
Email : mar_fsi@hotmail.com
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 11/20/2008
Submission Content/Notes : The referendum passed, so take the time to plan the most critical and cost efficient lines/stations for the economic and environmental health of Honolulu. Include the airport, UH - Manoa, and Waikiki in the first tranche of construction. The taxpayers will reap the best return for their investments in terms of ridership and increased tourist dollars. The allure of rapid transit from the POE (airport) to the final destination (Waikiki) for visitors can not be underestimated. A spur to UH - Manoa is also a no-brainer. Students crave fast, affordable transportation, with the benefit of no parking hassles. Build this transit system the right way - from the start!
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 82 DETAILS

Status : Initial Action Needed
Creation Date : 11/21/2008
Creator Affiliation :
First Name : John
Last Name : Johnston
Business/Organization : Shinseido Therapy
Address : 55 S. Kukui St.
Alternative Preference : Airport
Apt./Suite No. : D 2102
City : Honolulu
State : HI
Zip Code : 96813
Email : john@shinseidotherapy.com
Telephone : 265-6477
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 11/21/2008
Submission Content/Notes : 100% behind the airport route! Let's get started.
Already too much talking.

Thank you,

john
Yes
Reply Requested :
Submission Type : Providing Information
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 83 DETAILS

Status : Initial Action Needed
Creation Date : 11/21/2008
Creator Affiliation :
First Name : HArroy
Last Name : Huyler
Business/Organization :
Address : 147 Oko St
Apt./Suite No. : 3
City : Kailua
State : HI
Zip Code : 96734
Email : hwhuyler@yahoo.com
Telephone : 8084383212
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 11/21/2008
Submission Content/Notes : Rail and What Is The Cost from Year 1 to 10.
First, we the public need to see a published, in the local week-end newspapers, counting of the votes for and against RAIL. The pure number count of voters who were FOR and those AGAINST.
Second, the public needs to see, published in the local week-end newspapers, the complete costs of the STEEL ON STEEL rail system, from year 1 through year 10. All involved costs AND all projected sources and amount of funds projected to be received to fund the costs.
Third, the current route, which does not include the AIRPORT, seems to be politically motivated, therefore an ECONOMIC ANALYSIS must be provided to the public, in the local week-end newspapers, showing the advantages and disadvantages of all possible routes, including AIRPORT & SALT LAKE .
Fourth, what is the future plan to provide similar service to all parts of Oahu. If there is no plan, WHY ISN'T THERE A PLAN, are we not as important as citizens on the current proposed route?
Fifth, who are the BUSINESS proponents for the current RAIL system, what amount of have they contributed to any Hawaii Legislative members campaigns or operating expenses, AND what plans do those businesses have for improvements in areas currently committed to being train stations/stops/loading-unloading?
Reply Requested : Yes
Submission Type : Draft EIS Comment

RECORD # 87 DETAILS

Status : Initial Action Needed
Creation Date : 11/22/2008
Creator Affiliation :
First Name : David
Last Name : Brown
Business/Organization : AIT Taipei
Address : 4170 AIT Taipei Place
Alternative Preference : Salt Lake
Apt./Suite No. :
City : Dulles
State : VA
Zip Code : 20189
Email : Brownde22@yahoo.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 11/22/2008
Submission Content/Notes : I am temporarily living in Taiwan, but own property in Salt Lake. I am very upset that there was a vote on the rail project where the agreed route had been through Salt Lake. However, within hours of the public's Nov 4 vote endorsing the rail project, certain city council members were proposing to change the route -- including one who had fought tooth-and-nail against the entire project. The mayor and the council members are supposed to be the people's servants. This sudden switch was a betrayal. They should go back to the route endorsed earlier by both the Council and the people -- i.e. the Salt Lake route.

When the system is built out in the future, perhaps an airport spur could be added.

thanks. David Brown
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 88 DETAILS

Status : Initial Action Needed
Creation Date : 11/24/2008
Creator Affiliation :
First Name :
Last Name :
Business/Organization :
Address :
Alternative Preference : Airport
Apt./Suite No. :
City :
State : HI
Zip Code : 96818
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 11/24/2008
Submission Content/Notes : I voted against rail but since we have to move ahead let's do it right and go the airport route. It's a no- brainer, more riders and revenue. Salt Lake make very little sense at all.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD #89 DETAIL

Status : Initial Action Needed
Record Date : 11/24/2008
Creator Affiliation : Other
First Name : Sharon
Last Name : MacQuoid
Business/Organization :
Address : 411 Iliaina Street
Alternative Preference : Airport
Apt./Suite No. :
City : Kailua
State : HI
Zip Code : 96734
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 11/24/2008
Submission Content/Notes : I support the route that stops at the airport and believe that we need a parking structure in that area to assist Windward residents.
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :
Attachments : CS - 89 MacQuiod.pdf (1 kb)
DTS Comment Response Ltr.pdf (22 kb)

RECORD # 90 DETAILS

Status : Initial Action Needed
Creation Date : 11/24/2008
Creator Affiliation :
First Name : David
Last Name : Kimball
Business/Organization : University of Hawaii
Address :
Alternative Preference : Neither
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96822
Email : dkimball@hawaii.edu
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 11/24/2008
Submission Content/Notes : Hopefully this has been considered, or is being considered as an option. To have the rail run through Salt Lake, but with a spur down through Mapunapuna to service the airport? The Salt Lake route will cost less, and service the locals. The spur will service locals and the visitors. Of course getting the visitors into Waikiki w/out them having to pick up a car at the airport will have great results in reducing the number of cars in H1.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 91 DETAILS

Status : Initial Action Needed
Creation Date : 11/24/2008
Creator Affiliation :
First Name : Kaimi
Last Name : Judd
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96813
Email : kaimijudd@hotmail.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 11/24/2008
Submission Content/Notes : The sequence of construction and operability should begin at the highest congestion point and where the short commutes will help at first - whether it be downtown or somewhere near it. Construction should continue to head out in both directions towards UH and especially out west. It should DEFINITELY have a stop at the airport. The stops should also be integrated with bus stops that have short circulations through the general area of the stop.

See other successful systems such as BART that have built in stages - they follow the same sequence of starting construction and operability at the heart of the traffic and not out on the edges.

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 92 DETAILS

Status : Initial Action Needed
Creation Date : 11/24/2008
Creator Affiliation :
First Name : Paulette A.
Last Name : Tam
Business/Organization : concerned resident
Address : P O Box 4787
Alternative Preference :
Apt./Suite No. :
City : Kaneohe
State : HI
Zip Code : 96744
Email : ptam1861@yahoo.com
Telephone : 247-2725
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 11/24/2008
Submission Content/Notes : Aloha,

Even though I do not live on the leeward side of Oahu, I support the Draft EIS in its entirety and feel the steel on steel rail transit system should be built as soon as possible from Kapolei through the airport to Ala Moana Center.

I can see myself catching the bus to Ala Moana Center and riding the rail transit to Kapolei and back in the event I get a job or move out to that area.

Thank you for your time.
Aloha,
Paulette A. Tam
concerned Kaneohe resident and former Kaneohe Neighborhood Member 1989-2006.

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 93 DETAILS

Status : Initial Action Needed
Creation Date : 11/24/2008
Creator Affiliation :
First Name : SL
Last Name : SUEN
Business/Organization : HING HANG TRADING GROUP LLC
Address : 1021 SMITH ST.
Alternative Preference :
Apt./Suite No. : 210
City : HON
State : HI
Zip Code : 96817
Email : S_SUENS@YAHOO.COM
Telephone : 5366422
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 11/24/2008
Submission Content/Notes : PROVIDING MORE MAP DETAILS AND DESCRIPTIONS ON EACH ALTERNATIVE OF SALT LAKE ROUTE AND AIRPORT ROUTE FOR THIS PROPOSED RAIL TRANSIT SYSTEM ON THIS ISLAND COMMUNITY. HAVE THANKSGIVING.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 94 DETAILS

Status : Initial Action Needed
Creation Date : 11/24/2008
Creator Affiliation :
First Name : Taryn
Last Name : Wong
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96744
Email : kerotw24@hotmail.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 11/24/2008
Submission Content/Notes : I am totally against the rail system. It is too expensive, will take too long to build, and will ruin our island. Hawaii does not even allow billboard signs and they want to put a rail up across our skyline? What are we going to do about traffic NOW until the year 2030? This is not a federally funded project, so how is Hawaii going to pay for this? Shouldn't we use the state money for our public schools?
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 95 DETAILS

Status : Initial Action Needed
Creation Date : 11/24/2008
Creator Affiliation :
First Name : Rock
Last Name : Tang
Business/Organization :
Address : 1448 Young Street
Alternative Preference :
Apt./Suite No. : 603
City : Honolulu
State : HI
Zip Code : 96814
Email : rocktang@excite.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 11/24/2008
Submission Content/Notes : Kudos to re-evaluating the Airport route. Given that we have 4.5 million visitors a year to Honolulu and numerous resident trips, it seem intuitive that we should proceed with an airport to Waikiki route. Let's build something our transit savvy guests (Japanese visitors especially) will want to use and make their trips more enjoyable and make them more likely to return.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 98 DETAILS

Status : Initial Action Needed
Creation Date : 11/24/2008
Creator Affiliation :
First Name : Nancy
Last Name : Campbell
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96706
Email : colmenares@hawaii.rr.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 11/24/2008
Submission Content/Notes : bl would like you to know that this is a great move for the island. I would have attended UH or HPU for my masters degree but due to traffic issues on the island, I had to complete my education online. With this choice, I did not have to worry about driving and coming home late and tired with no time to spend with my family.
In addition, this project will open up such great opportunities. I will now be able to apply for a higher paying job in town and not worry about traffic while living in the Leeward area. THANK YOU!!!
Whatever routes we start with on this transit plan, is a start. Like Mufi says, it is something. Keep up the awesome work and I can't wait until the rail transit extends to EWA BEACH or near the area.

Thank you very much!
Nancy Campbell

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 99 DETAILS

Status : Initial Action Needed
Creation Date : 11/24/2008
Creator Affiliation :
First Name : Cary
Last Name : Haitsuka
Business/Organization :
Address : 95-1174 Anuanu St
Alternative Preference : Airport
Apt./Suite No. :
City : Mililani
State : HI
Zip Code : 96789
Email : haitsukac002@hawaii.rr.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 11/24/2008
Submission Content/Notes : I like to say I would prefer the rail go through the airport and to Waikiki and UH Manoa in the future. Thanks for letting us input our comments for the rail system. Cary
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 101 DETAILS

Status : Initial Action Needed
Creation Date : 11/25/2008
Creator Affiliation :
First Name :
Last Name :
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96778
Email : pukanala@ptd.net
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 11/25/2008
Submission Content/Notes : My Opinion: Ten years from now when the keiki's grow up and the populace has grown the problem will be the same as it is now. When I see the island chain on the map, it looks like a big band-aid. Change the driving age? Limit the no. of cars per family? This deal is all about money and jobs to keep Hawaii fluid not about alleviating the traffic problem. If the rail absorbs 22% of the traffic now, what is the percentage for ten years from now? My guess is it will be ground hog day.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 102 DETAILS

Status : Initial Action Needed
Creation Date : 11/25/2008
Creator Affiliation :
First Name : L.
Last Name : Tomita
Business/Organization :
Address : 94-870 Lumiauau St
Alternative Preference :
Apt./Suite No. : A203
City : Waipahu
State : HI
Zip Code : 96797
Email : tomits@kahala.net
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 11/25/2008
Submission Content/Notes : 1. initial route: UH Manoa & Kalaeloa. extension: Ala Moana SC. don't see Ala Moana SC workers/shoppers at the H-1/H-2 merge at 5 am.
2. why the love affair with Salt Lake? wouldn't more people benefit with an airport route?
regarding 1. & 2, above: thought the whole rail idea was to serve the greatest good. the greatest good don't live in Salt Lake. do your homework!
3. too much focus on initial cost. how much is it going to cost for upkeep? the C & C of HNL can't even fill potholes. how are we going to pay for rail maintenance?
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 104 DETAILS

Status : Initial Action Needed
Creation Date : 11/25/2008
Creator Affiliation :
First Name : Cheri
Last Name : Michel
Business/Organization :
Address :
Alternative Preference : Airport
Apt./Suite No. :
City :
State : HI
Zip Code : 96706
Email : cherimichel@earthlink.net
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 11/25/2008
Submission Content/Notes : I strongly support rerouting the rail system to include the Honolulu International Airport. To bypass such an integral part of our infrastructure seems short sighted and irresponsible. After waiting so long to get this rail system plan moving, please do not allow a political tug-of-war to impede our ability to take care of our future here on Oahu.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 105 DETAILS

Status : Initial Action Needed
Creation Date : 11/26/2008
Creator Affiliation :
First Name : Jerry
Last Name : Lynch
Business/Organization : Baywest
Address : 4496 Aukai Avenue
Alternative Preference : Airport
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96816
Email : jerrylynch@mac.com
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 11/26/2008
Submission Content/Notes : The Airport Option is best for everyone. Every major City with Rail strives to connect it to the Airport.
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 106 DETAILS

Status : Initial Action Needed
Creation Date : 11/26/2008
Creator Affiliation :
First Name : Cree
Last Name : Akana
Business/Organization : Private
Address : 3515-A Kaimuki Ave
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96816
Email : cakana@honolulu.gov
Telephone : 366-4421
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 11/26/2008
Submission Content/Notes : Not exactly sold on the "Rail" but because it has some what been decided that it will be coming, the airport route will serve a better cause. If us the "Tax payers" are going to pay for this project, the Airport route would be my preferred choice.
Most cities in America have there rail system routed in or near the airport, and for reasons that need no explanation.
My hope is that the City Council will make the right choice, and for the greater good of our Island, and not for political reasons.
On a side note this rail project in my personal opinion will not relieve traffic like its proposed to do. All it does is leaves behind someones legacy, and adds to ones resume saying that "when I was mayor I started the rail in Hawaii".
But leaves behind the on going "Bill" that we will have to pay forever.
Suggested thoughts:
Fix and correct our backwards freeways.
Open up our traffic choke points
Middle St. merge
Halawa / Stadium merge
H-2 merge.
Correct on & off ramps to create traffic flow. ETC.

Mahalo

Reply Requested :

RECORD # 107 DETAILS

Status : Initial Action Needed
Creation Date : 11/28/2008
Creator Affiliation :
First Name : Marilyn
Last Name : Stassen-McLaughlin
Business/Organization : Retired teacher
Address : 4300 Waiialae Ave.
Alternative Preference : Airport
Apt./Suite No. : 203-B
City : Honolulu
State : HI
Zip Code : 96816
Email : macnnel@lava.net
Telephone : 808732-7605
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 11/28/2008
Submission Content/Notes : I support "Rail," but I feel strongly the route should be along Nimitz to the airport, via Pearl Harbor. It's senseless to go through Salt Lake. The airport route would be a convenience residents and tourists alike. We must plan for therail to UH, also. I see little sense with Salt Lake. Even if it's more expensive, please select the airport route.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 108 DETAILS

Status : Initial Action Needed
Creation Date : 12/1/2008
Creator Affiliation :
First Name : charlie
Last Name : chang
Business/Organization :
Address : 91-941 Ololani Street
Alternative Preference :
Apt./Suite No. :
City : Ewa Beach
State : HI
Zip Code : 96706
Email : creationexistence@yahoo.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/01/2008

Submission Content/Notes : Portland, Denver, Washington D.C. and Charlotte is not in the middle of the ocean. I believe I heard on the CD that was sent to me, you are estimating 200,000 plus more people living on this Island driving vehicles. If the roads are crowded imagine 200,000 plus people riding the transit. It doesn't make sense. Then you talk about 11000 jobs and that is good but what happens after the job is completed? The cost of everything else goes up, who has to survive the cost of a high economy? Isn't there enough foreclosures, retired people have to look for another job, homeless people, welfare people who is able to work but is not working owning nice cars and boats, and much more issues that will be affected. There should be a double decker for the freeway where everyone pays for the road from their own registration. By having the rail transit we are force to pay for something we may never use. Remember not everyone will ride the rail transit. This is not feasible and not fair for (hopefully we still have the middle class around) many retirees and elderly people. They don't get overtime nor do they get pay raise to up keep with high cost of living. One day you will be an elderly person and that is the only time you will realize the rail transit is not good for Hawaii because we live on a Island. I guess we love to spend other people money to get what we want. Why should there be a stop at the statium? The stops should be located from Kapolei to Pearl Harbor, Airport, Downtown, Waikiki, and Daimond Head. Place where most tourist will be affected.

Reply Requested :

RECORD # 109 DETAILS

Status : Initial Action Needed
Creation Date : 12/1/2008
Creator Affiliation :
First Name : David
Last Name : Bremer
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City : Mililani
State : HI
Zip Code : 96789
Email : bremerd001@hawaii.rr.com
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 12/01/2008
Submission Content/Notes : For the proposed LCC fixed guideway station, there is no pedestrian access for communities within walking distances less than a mile from the station. These include Waikele, Waipahu, and Seaview.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 111 DETAILS

Status : Initial Action Needed
Creation Date : 12/3/2008
Creator Affiliation :
First Name : Roy
Last Name : Higashide
Business/Organization :
Address : 1302 Victoria St.
Alternative Preference :
Apt./Suite No. : 218
City : Honolulu
State : HI
Zip Code : 96814
Email : higashideroy@yahoo.com
Telephone : 808-853-8441
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/03/2008
Submission Content/Notes : With the economy as it is and projected to be, couldn't you make it like how they quickly rebuilt after those California earthquakes and have as many qualified construction companies build sections with both incentives and penalties for speed and quality construction? Also because of the times, what kind of security will be there on the trains as well as around the stations? Thanks Roy
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 112 DETAILS

Status : Initial Action Needed
Creation Date : 12/3/2008
Creator Affiliation :
First Name : Brittany
Last Name : Maae
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96826
Email : bmaae@hawaii.edu
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/03/2008
Submission Content/Notes : I'm doing a research project for college. Will you please answer the follow:
1. Is It possible that some how the rail can get damaged? If so where will the money come from?
2. Are you 100% sure that enough people will even ride the rail, so that our traffic problem will die down?
3. What types of job will be available?
4. Is rail necessary? If so why?
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 115 DETAILS

Status : Initial Action Needed
Creation Date : 12/4/2008
Creator Affiliation :
First Name : Daniel-W.
Last Name : Tiedge
Business/Organization : University of Bremen, Germany
Address : Carl-Severing-Str. 28
Alternative Preference :
Apt./Suite No. :
City : Bremen, Germany
State : HI
Zip Code : 28329
Email : danitedge@aol.com
Telephone : +49-177-7781239
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/04/2008

Submission Content/Notes : Dear Sir or Madam,

I am a 23-year old student writing you from Bremen, Germany, where I study geography at the local university. I think it is excellent that the Honolulu rail transit project has been approved by the voters. I lived and went to high school (McKinley) in Honolulu for a total of 1,5 years. So I am well aware of the traffic problems the city and residents have to face everyday. Being an experienced rail-rider and a fan of rail-based mass-transit, I strongly believe that bringing rail transit to Oahu will be a successful project.

This Christmas I will be in Honolulu for a period of three weeks. And my question is now, if is any opportunity to some volunteer-work at your agency while I am there. That would be a great way for me to gain some experience abroad as plan to make my living later on by promoting and planning rail-based transit in the US. And may be you could even benefit from me being an experienced rail-rider.

Mahalo for taking the time to read my message.
Your sincerely
Daniel Tiedge

Yes
Draft EIS Comment

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 116 DETAILS

Status : Initial Action Needed
Creation Date : 12/4/2008
Creator Affiliation :
First Name : Gene
Last Name : Grounds
Business/Organization :
Address : 245 Mahimahi Place
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96821
Email : groundsg001@hawaii.rr.com
Telephone : 808-377-5101
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/04/2008
Submission Content/Notes : I fully support and accept this EIS. I prefer the airport route over the Salt Lake route.
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 117 DETAILS

Status : Initial Action Needed
Creation Date : 12/5/2008
Creator Affiliation :
First Name : Melissa
Last Name : Ching
Business/Organization :
Address : 98-1234 ILIEE PLACE
Alternative Preference :
Apt./Suite No. :
City : AIEA
State : HI
Zip Code : 96701
Email : melching@hawaii.rr.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/05/2008
Submission Content/Notes : You should do Charles K. Djou plan and start at downtown and work your way to Aiea. Doesn't make sense to go from Kapolei to Waipahu. Ridership is going to be much greater from going into downtown from Aiea or Stadium then Kapolei to Waipahu. That way you will be making money or or at least breaking even on operating costs with high ridership.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 119 DETAILS

Status : Initial Action Needed
Creation Date : 12/5/2008
Creator Affiliation :
First Name : Sean
Last Name : Ishii
Business/Organization :
Address : 930 Kaheka St
Alternative Preference :
Apt./Suite No. : 3202
City : Honolulu
State : HI
Zip Code : 96814
Email : sean_ishii99@yahoo.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/05/2008
Submission Content/Notes : I believe that rail would work best, that is get the most usage, by going near the airport not through Salt Lake. I also believe the ridership on the first segment would be higher if the rail is built nearer to town. It makes no sense to build it out west first. Lack of use with that train that "goes nowhere" could cause large financial issues and would increase taxpayer burden.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 121 DETAILS

Status : Initial Action Needed
Creation Date : 12/5/2008
Creator Affiliation :
First Name : Laura
Last Name : Keaton
Business/Organization :
Address : 86-058 Alta St
Alternative Preference :
Apt./Suite No. :
City : Waianae
State : HI
Zip Code : 96792
Email : lkeaton@keatonconsulting.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/05/2008
Submission Content/Notes : 1. Please make sure that the rail cars have space for luggage if the airport stop is included. Right now, I cannot take the bus to the airport since it does not allow for luggage.

2. What is the estimated part replacement time for a steel-on steel system in a salt water climate due to corrosion?

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 123 DETAILS

Status : Initial Action Needed
Creation Date : 12/6/2008
Creator Affiliation :
First Name : S
Last Name : Batula
Business/Organization :
Address : 45-247 Kulauli St
Alternative Preference :
Apt./Suite No. :
City : Kaneohe
State : HI
Zip Code : 96744
Email : seccd001@aol.com
Telephone : 235-0423
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 12/06/2008

Submission Content/Notes : December 6, 2008

Department of Transportation Services
City and County of Honolulu
650 S King St, 3rd Floor
Honolulu, HI 96813

RE: Rail related routing of the proposed fixed Rail System

Dear Sirs:

This concerns the inquiry into a feasibility review for the proposed fixed Rail System. If we must have rail, I suggest that the preferred rail alignment be the existing 40 feet rail road right-of-way. This entails the Dillingham's OR&L right-of-way from the old Iwilei Train Station to the Leeward coast of Waianae.

Routing of the rail system through out the Ewa Plains (Kapolei-Aiea) could then be constructed at ground elevation as a possible alternative verses a costly elevated system.

The rail system should also service the Honolulu Airport Terminals which will enhance rail ridership. Please note that the lack of ridership of the elevated rail system in the City of Las Vegas does not serve the McCarran International Airport and is now under consideration.

Further consideration is requested for your planning review for a proposed bridge over the Ala Wai canal extending University Avenue into Waikiki. The bridge primarily will be used for pedestrians and to include a bus/trolley service or possibly a state of the art light rail system usage linking Waikiki/Moiliili/UH Manoa school campus (i.e. Ft. DeRussy's Kuroda Field – UH Campus).

I champion the involvement of a planning team undertaken by the UH Engineering students/faculty for the development of the conceptional design for this task and to also include the overall beautification design implementation of the much needed University Avenue.

Respectfully,

S. Batula
Kaneohe resident
45-247 Kulauli St.
Kaneohe, HI 96744

c: Charles K. Djou
City Councilman

Reply Requested :

Yes

Submission Type :

Draft EIS Comment

RECORD # 124 DETAILS

Status : Initial Action Needed
Creation Date : 12/6/2008
Creator Affiliation :
First Name : karen
Last Name : nishimura
Business/Organization : retired
Address : 98-1691 Apala Ip.
Alternative Preference :
Apt./Suite No. :
City : Aiea
State : HI
Zip Code : 96701
Email : karensaeko@hawaii.rr.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/06/2008
Submission Content/Notes : I agree with what Dijou has suggested in the Honolulu Advertiser 12/5/08. If the rail project will be done in segments, starting in Pearl City with parking for the people living beyond the H1/H2 merge makes sense. The people living beyond the H1/H2 merge will be able to park in Pearl City and catch the rail to their destination. Also, the idea of having bicycles to rent or stalls for privately owned bicycles aounds feasible.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 125 DETAILS

Status : Initial Action Needed
Creation Date : 12/6/2008
Creator Affiliation :
First Name : Ron
Last Name : Suwa
Business/Organization :
Address : 94-1050 Pulelo Street
Alternative Preference :
Apt./Suite No. :
City : Waipahu
State : HI
Zip Code : 96797
Email : rmsuwa@gmail.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/06/2008
Submission Content/Notes : I think the first section of the rail should be between Pearl City and Honolulu. I also favor Pearl Harbor/Airport versus Salt Lake.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 126 DETAILS

Status : Initial Action Needed
Creation Date : 12/6/2008
Creator Affiliation :
First Name : Tom
Last Name : Pickard
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96731
Email : pickardt001@hawaii.rr.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/06/2008
Submission Content/Notes : I am totally for the rail system.
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 127 DETAILS

Status : Initial Action Needed
Creation Date : 12/6/2008
Creator Affiliation :
First Name : Kathleen
Last Name : Ebey
Business/Organization :
Address : 98-1778 Piki St
Alternative Preference :
Apt./Suite No. :
City : Aiea
State : HI
Zip Code : 96701
Email : weetrees@hawaii.rr.com
Telephone :
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 12/06/2008
Submission Content/Notes : I agree with Councilmember Dijou. A rapid transit from Kapolei to Waipahu will have very little ridership until it is completed to town or beyond. Why ride it to Waipahu and then have to get on a bus to go the rest of the way. Just get on the bus in Kapolei, or continue to drive. However if you start at the "destination" and work backwards, then people start riding it right away. Take a bus or drive to a point and then ride the rapid transit to destination. Makes much more sense. And it also gives tourists an option to get around in the areas they are normally visiting. Tourists certainly aren't going to use it between Kapolei and Waipahu. Also, it gets immediate visibility and can gain immediate support, rather than being in the "boonies" (and I live on the edge of Aiea and Pearl City!!) where nobody sees it or gets to try it out.
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 128 DETAILS

Status : Initial Action Needed
Creation Date : 12/6/2008
Creator Affiliation :
First Name : wayne
Last Name : chun
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96701
Email : chunw007@hawaii.rr.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/06/2008
Submission Content/Notes : Dear Sirs,

I was not a supporter of the HNL Rail Transit, I will yield to the results of the recent general election. In light of our State's overall economy, I feel construction of the HNL Rail Transit will create the critical surge the construction of the HNL Rail Transit will do to stimulate our State's sluggish economy during this national economic downturn.

It is my opinion that we initiate the construction of the HNL Rail Transit from Oahu's economic hub, downtown Honolulu. This will provide the taxpayers of Oahu the most immediate ridership between downtown to PearlCity and vice versa. This route will have the most immediate financial re-payment. Secondly, the airport route can be easily implemented into this initiate route.

Starting from West Oahu, the ridership impact into downtown Honolulu will not materialize for an additional 3 - 4 years due to the distance from downtown Honolulu and the overall cost will be much higher in comparison to the downtown Pearl City route.

For the above reasons, I favor Councilman Charles Dijou's concept.

Sincerely,
Wayne G.K. Chun

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 130 DETAILS

Status : Initial Action Needed
Creation Date : 12/6/2008
Creator Affiliation :
First Name : Brent
Last Name : Kagawa
Business/Organization :
Address : 91-1120 Puahala Stret
Alternative Preference :
Apt./Suite No. : 18R
City : Ewa Beach
State : HI
Zip Code : 96706
Email : ba_kagawa@yahoo.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/06/2008
Submission Content/Notes : I am in favor of the rail system.

I would like to know the following:

- 1) plans for police protection for the rail and for each individual station.
- 2) does the rail plan to run 24/7 and will police protection be provided?
- 3) are there plans for parking and security for the parking at each individual station?

Thank you for your time.

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 132 DETAILS

Status : Initial Action Needed
Creation Date : 12/6/2008
Creator Affiliation :
First Name : Robert
Last Name : McHenry
Business/Organization :
Address : 1510 Bertram St.
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96816
Email : mchenry@hawaii.edu
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/06/2008
Submission Content/Notes : I strongly support the city's rail plan as essential to the future of Honolulu. It is long overdue, and the importance of including the airport in the plans cannot be overstated. Plenty of residents will use the service when it is available, not just visitors. If this is to remain a liveable city, we must provide mass transit, as all major urban centers I've visited have done.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 133 DETAILS

Status : Initial Action Needed
Creation Date : 12/6/2008
Creator Affiliation :
First Name : Candice
Last Name : Tan
Business/Organization :
Address : 324 ILIMANO Street
Alternative Preference :
Apt./Suite No. :
City : Kailua
State : HI
Zip Code : 96734
Email : cleetan@hawaii.rr.com
Telephone : 254-4097
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/06/2008
Submission Content/Notes : Yes, let's do it.

There has been enough arguing and complaining.

Let's get this thing started! It's going to cost a lot of money, but we have a lot of people to share the cost.

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 134 DETAILS

Status : Initial Action Needed
Creation Date : 12/6/2008
Creator Affiliation :
First Name : Stanley
Last Name : Nelson
Business/Organization :
Address : 66-080 Waialua Beach Road
Alternative Preference :
Apt./Suite No. :
City : Haleiwa
State : HI
Zip Code : 96712
Email : northshorebill@hawaiiantel.net
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/06/2008

Submission Content/Notes : I believe that construction of the project should start in Honolulu and be built towards the far end terminus. This will permit immediate use by commuters as segments are completed. I believe the Kapolei-Waipahu segment which be largely unused until the system is built out to Honolulu. If the base yard is absolutely critical, then construction should start at both ends and connect at some point.
I also support the airport route instead of going through Salt Lake. And the closer the route comes to Pearl Harbor and Hickam, the better. There are too many workers in the Pearl Harbor/Hickam complex to be ignored. And the airport and surrounding industrial area are also major employers.
Finally, If there is any way whatever, the link to UH should be included in the initial phase. We all are familiar with the significant reduction of traffic when UH is not in session. And there are a number of private schools in the area that further contributes to our traffic problems.

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 135 DETAILS

Status : Initial Action Needed
Creation Date : 12/6/2008
Creator Affiliation : Other
First Name : :Liz
Last Name : Crowder
Business/Organization :
Address : 44-096 Keaalau Place
Alternative Preference :
Apt./Suite No. :
City : Kaneohe
State : HI
Zip Code : 96744
Email : crowderm@hawaii.edu
Telephone : 808372-2570
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/06/2008
Submission Content/Notes : Please advise asap background info on the background of 5 transportation expert panel who supplied with steel-on-steel recommendation. Who are they? what were their credentials and why were they qualified to make a recommendation. I can't seem to find this anywhere. Mahalo
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 136 DETAILS

Status : Initial Action Needed
Creation Date : 12/6/2008
Creator Affiliation :
First Name : John
Last Name : Ornellas
Business/Organization :
Address : 2508 Komo Mai Dr
Alternative Preference :
Apt./Suite No. :
City : Pearl City
State : HI
Zip Code : 96782
Email : storm482000@yahoo.com
Telephone : 808-454-0171
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/06/2008
Submission Content/Notes : In my opinion the rail should be built from both ends and meet in the middle and build it using the airport route
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 137 DETAILS

Status : Initial Action Needed
Creation Date : 12/6/2008
Creator Affiliation :
First Name : Earl
Last Name : Tanioka
Business/Organization : Retired Police Officer
Address : 827-1 Ala Liliko St.
Alternative Preference :
Apt./Suite No. : Apt#1
City : Honolulu
State : HI
Zip Code : 96818
Email : taniokae002@hawaii.rr.com
Telephone : 808-833-3260
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/06/2008
Submission Content/Notes : Common Sense: Most traffic are people going to work or students going to school. Why then would you go through Salt Lake when more people work along the airport route and Nimitz Hwy. Salt Lake is more residential and very little business. Plus that area is too congested for building a superstructure like rail. C&C haven't even finished the widening of Salt Lake Blvd and Puuloa Rd.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 138 DETAILS

Status : Initial Action Needed
Creation Date : 12/6/2008
Creator Affiliation :
First Name : Daniel
Last Name : Hodel
Business/Organization :
Address : 76-897 Hualalai Road
Alternative Preference :
Apt./Suite No. :
City : Kailua Kona
State : HI
Zip Code : 96740
Email : daniel.hodel@earthlink.net
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/06/2008
Submission Content/Notes : Many of us living on the Neighbor Islands would visit Oahu much more frequently if the new rail system served the Honolulu Airport. Eliminating the headache of fighting traffic congestion just to get into town would mean more "return business" for Oahu, and I'm sure this applies equally well to tourists from the mainland and overseas. If other factors on the two competing routes are roughly equal, please choose the HNL option. Mahalo.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 139 DETAILS

Status : Initial Action Needed
Creation Date : 12/7/2008
Creator Affiliation :
First Name :
Last Name :
Business/Organization :
Address : 2345 Ala Wai Blvd
Alternative Preference :
Apt./Suite No. : 1601
City : Honolulu
State : HI
Zip Code : 96815
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 12/07/2008
Submission Content/Notes : I am heavily in favor of an initial rail route which services the airport. The importance of solid connections between HNL and the rest of the island cannot be overstated.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 140 DETAILS

Status : Initial Action Needed
Creation Date : 12/7/2008
Creator Affiliation :
First Name : Linda
Last Name : Soll
Business/Organization :
Address : 606 Hunakai St
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96816
Email : lsoll@hawaii.rr.com
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 12/07/2008
Submission Content/Notes : Please build the Pearl City to downtown rail first. That segment will actually be used. If the Kapolei to Pearl City segment is built first, and we don't have funds to complete the downtown route, we would be left with a RAIL TO NOWHERE that no one would use.
Thank you,
Linda Soll
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 141 DETAILS

Status : Initial Action Needed
Creation Date : 12/7/2008
Creator Affiliation :
First Name : Steven
Last Name :
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96814
Email : kokohead7k@hawaiiantel.net
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 12/07/2008
Submission Content/Notes : Question: What changes will be made to the Country Express bus route after the rail is operational?

I currently take the C Express bus from Ala Moana shopping center to Kapolei transit center and back. One bus takes me all the way (23-24 miles one way). The rail will not take me all the way. If I have to use (transfer) to/from The Bus once or even twice, the total commute time one way would take me longer when you factor in the additional waiting and transferring which I do not have now.

I would like a reply. Mahalo.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 142 DETAILS

Status : Initial Action Needed
Creation Date : 12/7/2008
Creator Affiliation :
First Name : Susan
Last Name : Werner
Business/Organization :
Address : 2017 Lelehuna Pl
Alternative Preference :
Apt./Suite No. :
City : Haiku
State : HI
Zip Code : 96708
Email : werners002@hawaii.rr.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/07/2008
Submission Content/Notes : I would like to express my strong support for the rail line to include a stop at the airport. As a neighbor island resident who visits Oahu occasionally, it would mean a lot to me to be able to get to either Kapolei or to the Ala Moana Shopping center directly from the airport, without having to rent a car or take a taxi, both of which would add an additional vehicle to the traffic.

I am disappointed that a more modern bullet-train type of system was not chosen instead of steel rail, but I consider steel rail better than no rail. Honolulu could have used this opportunity to step into the 21st Century of transportation; a bullet-train or similar technological system could also be a tourist attraction as well as transportation for residents. But I support the plan as long as it includes a stop at the airport.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 143 DETAILS

Status : Initial Action Needed
Creation Date : 12/7/2008
Creator Affiliation :
First Name : gilbert
Last Name : lee
Business/Organization :
Address : 94-226 Pouhana Loop
Alternative Preference :
Apt./Suite No. :
City : Waipahu
State : HI
Zip Code : 96797
Email : gilbert5826@hotmail.com
Telephone : 6880587
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/07/2008
Submission Content/Notes : I strongly support the Mass Rail Transit project. It's about time it was built. We've been talking about it for decades. As much as I dislike Councilman Djou's "tactics" to prolong the debate on the project, he has a point in building the Aiea to Downtown portion first. It would bring the most ridership at the project's very beginning. The proposal to run the route by the Honolulu Airport makes more sense. It would give our visitors another option to get to Waikiki and would give residents an option of getting to the airport without our cars.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 144 DETAILS

Status : Initial Action Needed
Creation Date : 12/8/2008
Creator Affiliation :
First Name : Moses
Last Name : Akana
Business/Organization :
Address : 98-1693 Kaahumanu Street
Alternative Preference :
Apt./Suite No. : 24C
City : Aiea
State : HI
Zip Code : 96701
Email : moakana@hawaii.rr.com
Telephone : (808) 455-3745
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/08/2008
Submission Content/Notes : Despite what's been in the news about what to build first, neither the Kapolei-Waipahu link nor the Pear City-downtown link will draw much ridership. For Kapolei-Waipahu, it makes no sense for someone working downtown to ride the rail to Waipahu and get off. Likewise, people in Pearl City probably won't ride it because they live on the Honolulu side of the H1/H2 merge, the bottleneck that causes grief for west and central Oahu commuters. The initial link should be built from Waipahu to downtown. Provide enough parking at the Waipahu station for commuters to leave their cars (like what the had at Village Park).
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 145 DETAILS

Status : Initial Action Needed
Creation Date : 12/8/2008
Creator Affiliation :
First Name : Kathleen
Last Name : Moore
Business/Organization :
Address : 45-556 Mahinui Raod
Alternative Preference :
Apt./Suite No. :
City : Kaneohe
State : HI
Zip Code : 96744
Email : moorej011@hawaii.rr.com
Telephone : 235-8041
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/08/2008
Submission Content/Notes : Honolulu Transit,

I would like to support building the first segment from Pearl City to Downtown. If an elevated base yard could be put over the lower Aloha Stadium parking lot, maybe the proposal could work and we could get significant traffic relief much earlier. It could be a temporary base yard till the build out is completed and then a park and ride.

With the economy in the tank, businesses and property owners may be more inclined to cooperate. The right of way would be cheaper in a down economy. Businesses would recover faster with the rail going by earlier.

Please think about this option seriously. I believe this option provides the best benefit to the citizens of Honolulu. If the economy goes into a depression, this may be the only segment completed for many years.

Kathleen Moore
Urban Planner

Reply Requested :
Submission Type : Draft EIS Comment

RECORD # 146 DETAILS

Status : Initial Action Needed
Creation Date : 12/8/2008
Creator Affiliation :
First Name : Bryan
Last Name : Mick
Business/Organization : City and County
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 98613
Email : bmick@honolulu.gov
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 12/08/2008

Submission Content/Notes : I got this email. Please send me the answers so I can respond. Mahalo!

1. In the end, how much will rail cost?
a. The mayor's office today (via honolulutrainsit.org, 12/4/08) claims rail will cost \$5.3 to \$5.4 billion dollars, depending on the route. Here is the claim, quoted: "The Salt Lake route will cost an inflation-adjusted \$5.3 billion and the airport route will cost an inflation-adjusted \$5.4 billion."
i. From what report do these figures come from?

2. How will we pay for rail?
a. Here's a list from the honolulutrainsit.org website: Firstly, will you please list and verify your sources for each of these?

- "From the 1/2% GET surcharge" = \$2.6 - \$3.2 billion (49%-60% of \$5.3 billion) - When will this tax sunset?

- "The Federal Transit Administration's New Starts program." = \$1.7 - \$2.2 billion (32%-42% of \$5.3 billion) - Mr. Cayetano and others have said this money is not certain (<http://www.honoluluadvertiser.com/article/20081013/BREAKING01/81013045>): what reasons (historical examples and laws), documents and/or testimonies do you have to dispute Mr. Cayetano's claim?

- "\$15.5 million for the planning phase has been appropriated by Congress for this year" = (0.28% of \$5.3 billion-- Is this worth mentioning?)

- "and another \$20 million is in the pipeline." (0.38% of \$5.3 billion- Again, a negligible amount unless there are larger political implications to this (if so, what are they, and how can we be certain of them?))

- "Local funding, with more than \$250 million banked for the project." (4.7% of \$5.3 billion) - Who specifically are these investors?

- "Federal funding is expected to increase significantly as the project moves to construction." - Which historical examples, laws, or testimonies of federal officials should we build our expectations for this on?

- Totalling all these, this puts revenues at: \$4.6-\$5.7 billion, well above the \$3.7 billion number the mayor claimed not long ago. Is the mayor responsible for this billion dollar gap? If not, who is?

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Yes
Draft EIS Comment

RECORD # 147 DETAILS

Status : Initial Action Needed
Creation Date : 12/8/2008
Creator Affiliation :
First Name : Dexter
Last Name : Furuhashi
Business/Organization : DOE Farrington Complex Schools
Address : 1564 North King St.
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96817
Email : dexter_furuhashi@notes.k12.hi.us
Telephone : 808 2165348
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/08/2008
Submission Content/Notes : For the proposed transit centers and park n' rides, what is the noise and traffic impact radius indicated and what document discusses such impact ?

Is there a conceptual drawing of a transit center or park n' ride located on line ?

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 148 DETAILS

Status : Initial Action Needed
Creation Date : 12/8/2008
Creator Affiliation :
First Name : Charles W
Last Name : Smith
Business/Organization :
Address : 4476 Kolohala Street
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96816
Email : cw@hawaiiintel.net
Telephone : 808-735-2173
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/08/2008
Submission Content/Notes : Oahu taxpayers cannot afford this huge extra debt for steel rail. Hawaii's financial situation is in a dangerous crash.
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 149 DETAILS

Status : Initial Action Needed
Creation Date : 12/8/2008
Creator Affiliation :
First Name : Wailani
Last Name : Ho
Business/Organization : PIA, Inc.
Address : P.O. Box 11012
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96828
Email : PIAHON@AOL.COM
Telephone : 591-1972
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 12/08/2008

Submission Content/Notes : I have traveled to numerous cities in the world and ridden dozens of transit systems with proven ridership histories in their respective communities. There is no doubt in my mind that I have a much more comprehensive understanding of rail systems than most people that live in Hawaii and this is why I not only wish to have my say, but to qualify my opinion as much broader than someone that believes this pie in the sky system is the answer to traffic on the island of Oahu. I feel Honolulu's rail program is flawed in many ways of which I will discuss only the most important.

Ridership is dependent upon many factors most importantly density and convenience. Honolulu, Ewa, Kapolei or where ever there are planned stops has no density. Hong Kong has density, New York has density, the Bay Area to a lesser extent has density. Without it people will have to some how travel to the train in order to get on it. In your EIS there is limited park and ride lots, without ample parking there will never be enough ridership to justify this project.

We are not a mass transit community and will never be one. Not only do most residents commute to and from work, but we all make stops to schools, shopping or run errands in our daily lives. Because we have no public school bus system and the density to make these other daily chores convenient people need to have their personal vehicles and a train, like the bus, is not an option. It is a major flaw to believe you will change the attitudes and behavior of a society simply by building a train that is not accessible to most.

Efficiency is key to providing a realized difference in commute times. Aside from possible economic gains commuters ride mass transit in large urban cities because it makes a marked difference in commute times. With 19 stops over 20 miles of rail the proposed train is not much faster than a present express bus and definitely not any faster than the alternate HOT lanes with dedicated expressed busses. Compare for instance Hong Kong's express train to/from the airport to Hong Kong, there are a total of 3 stops prior to reaching the IFC center in under 30 minutes. Distance is approximately 14 miles. This is train is complimented by an underground subway system and other trains than run throughout China. It's purpose is fairly singular as the goal is getting people to and from one of the best airports in the world.

Similarly, stops per mile along BART's routes are far less than the 1 per mile proposed for Honolulu. Secondly, the noise that emanates from steel on steel rail is very loud as anyone that has stood in a New York, Chicago or San Francisco tube can attest to. It is not quite and quite frankly that is why these systems are for the most part burried beneath ground. Your EIS fails to adequately address this problem and sugar coats the end result. What transit system in the world sends trains through the air in it's densist metropolitan area? None, they are all beneath ground because of noise and because they can more effciently address ingress/egress issues. Why isn't this a must for Honolulu? It's like the city is attempting to ramrod a third class system down our throats because it does not want to adequately address the real issues. Do it right or don't do it at all would be a good moto to

follow.

Historically, city public works projects have a proven track records of inadequacy, cost overruns and blunders. From sewer work to road maintenance the city has proved time and again that it is not up to task in any facet of public works. It is pitiful to me to compare our achievement and results compared to other cities in the United States and abroad. The fact that it takes 2 years to replace 1.0 mile of sewer under Kapiolani Blvd., all the while leaving the surface road nearly undrivable to anything but a 4WD truck, is inexcusable. I won't go into the same type of project along Kalaheo Ave., but will say that there are few major cities in America that would put up with that type of government foolishness. My assessment of the city being able to bring a 3 rate rail system on line, on budget and on time are just about as optimistic as getting these sewer projects completed. We will be \$6B into it before we realize that it is taking twice as long and twice as much as originally estimated.

Lastly and on a more personal I am deeply troubled by trade unions endorsing rail over other alternatives, when they should be neutral. If there are any public works projects, rail, bus, HOT lane or other, they will all require building trades to do, which option is chosen should not be influenced by the ultimate beneficiary of tax payer monies. By using endorsing rail the unions have tainted the project as nothing but political pay back and that wrong. It is so wrong that it should be investigated more thoroughly by Federal authorities, since a small portion of the project's funds are supposed to be coming from that source.

Because I am working and cannot attend tonight's public hearing I would like this to be presented verbally or in writing to those that are in attendance and for the record. Mahalo.

Reply Requested :
Submission Type :
**FOIA (Freedom of
Information Request)
Request :**
FOIA Referral Date :
FOIA Response Date :

Yes
Draft EIS Comment

RECORD # 150 DETAILS

Status : Initial Action Needed
Creation Date : 12/8/2008
Creator Affiliation :
First Name : karen
Last Name : sunahara-teruya
Business/Organization :
Address : 94-537 Holaniku St.
Alternative Preference :
Apt./Suite No. :
City : Mililani
State : HI
Zip Code : 96789
Email :
Telephone : 808-341-9864
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 12/08/2008
Submission Content/Notes : I have been commuting from Mililani to town for the last 25 years. Although I am against the rail and voted accordingly, if the City does move forward, I believe that the first segment should NOT be from Kapolei to Waipahu. This is the most stupidest thinking I have seen yet. What were the transportation planners thinking!!! The route should be from the center core Honolulu outward. For there to be any significant impact in the early stages, it is to take traffic out of the Pearl City to Honolulu segment. How the planners cannot think of this logical aspect is astounding! What will the Kapolei to Waipahu segment buy us, when everyone is trying to get into town? Do you expect the leeward folks to ride the rail from Kapolei to Waipahu and then catch the BUS into town? Come on, where is the logical thinking on this. Lets do whats right and not do the stupid thing just because it was planned that way. The City should think smarter with our tax dollars.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 152 DETAILS

Status : Initial Action Needed
Creation Date : 12/8/2008
Creator Affiliation :
First Name : J
Last Name : Such
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96707
Email : maumutt@gmail.com
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 12/08/2008

Submission Content/Notes : The reason so few have input at this stage is because our voices will not be heard. This administration is arrogant and a bully and has demonstrated this from day one regarding the rail. Mufi's "my way or the highway" prevails and no amount of discussion will change that. That is why he did not get my vote or ever will for that matter. The rail cost is too expensive for the few taxpayers of this island. No one in their correct mind has ever started a rail system from its' farthest point out in the hopes it would someday reach the city. Absolutely amazing and ridiculous. The mayors' reply? "There are too many potential lawsuits in Waikiki" and so these will magically disappear by starting at the opposite end? Zero logic, zero sense. No connection to the airport? Again, what modern city did not connect their rail to the airport and/or train stations? Now this administration has gained full control over the bidding, so as in the beginning, all of the mayor's friends, family, and campaign contributors will get the contracts and we the taxpayers will foot the bill. It smells of corruption. This boondoggle will not be completed on time nor on budget nor do Hawaii's workers have the training, talent, or desire to build this with quality. It took DOT 12 months to identify one single buried cable near Pearl Harbor that cost an additional \$1 million dollars to the taxpayers. One cable, one year. By comparison, St. Paul MN rebuilt their massive multilane bridge over the Mississippi in 13 months. Here, 12 months just to identify one cable. At that rate this rail should be done by the next century. Track record? Look at H-3... I believe that short stretch of highway took 37 years. Not exactly speedy construction histories for Hawaii. Electricity? How is this administration going to keep the electric cables in the ground when according to DOT, they presently cannot figure out how to keep the wiring for the lighting for H1 in the ground. It is going on 3 years now and H1 is still dark. Is the rail going to sit for 3 years too without electric while DOT does nothing? And you wonder why no one bothers giving you folks input...what would be the point? What is needed is an in depth Federal investigation and oversight into this Administration, its' bidding processes, and the rail planning or lack of it. There is no other label for this project than boondoggle. Period.

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 153 DETAILS

Status : Initial Action Needed
Creation Date : 12/8/2008
Creator Affiliation :
First Name : Richard
Last Name : Kamis
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96815
Email : kamii@hawaii.rr.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/08/2008
Submission Content/Notes : Please consider Councilman Djou's recommendation to begin rail construction at the east end of any proposed route, working toward the ewa direction. If only partial work can be accomplished, what is completed at the east end would be useable. If there is merely a portion completed at the west end it would not prove to be very valuable.

Thank you for your consideration.
Richard Kamis
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 154 DETAILS

Status : Initial Action Needed
Creation Date : 12/8/2008
Creator Affiliation :
First Name : Emily
Last Name : Hawkins
Business/Organization :
Address : 516 Kaimake Loop
Alternative Preference :
Apt./Suite No. :
City : Kailua
State : HI
Zip Code : 96734
Email : emilyh@hawaii.rr.com
Telephone : 2625283
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/08/2008
Submission Content/Notes : The question of a route in Salt Lake or at the airport can be easily settled by doing what has been done at Baltimore. Both the airport and train stop are called BWI and if you arrive by train there is a shuttle to the airport which covers a distance longer than the distance between Salt Lake and the airport. Let rail go by Salt Lake with the name HNL.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 156 DETAILS

Status : Initial Action Needed
Creation Date : 12/9/2008
Creator Affiliation :
First Name : Steven
Last Name : Vaspra
Business/Organization : Individual
Address : 67-055 Kaioe Pl
Alternative Preference :
Apt./Suite No. :
City : Waialua
State : HI
Zip Code : 96791
Email : vaspras001@hawaii.rr.com
Telephone : 292-0912
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/09/2008
Submission Content/Notes : I am definitely for the Rail project and prefer the airport route starting from Kapolei!
I am born, raised and live in Waialua and have made the commute into Honolulu for 44years (I am 59) for school, work and I still commute into Honolulu for work. I have seen, and experienced, the traffic nightmare get worse over the years. With the developement of the second city in Kapolei, the traffice has gotten, is getting, and will get even worse. Councilman Djou is an idiot and Kobayashi and Dela Cruz (our councilman!) aren't far behind.
Steve Vaspra
Waialua, Oahu, Hi
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 157 DETAILS

Status : Initial Action Needed
Creation Date : 12/9/2008
Creator Affiliation :
First Name : Ted
Last Name : Taheny
Business/Organization :
Address : 85-1053 Piliuka way
Alternative Preference :
Apt./Suite No. :
City : Waianae
State : HI
Zip Code : 96792
Email : ttaheny@khon.com
Telephone : 696-6924
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/09/2008
Submission Content/Notes : I would like to ride my bicycle to the train, take it on the train into town, and ride it from the station to work... provided you make allowances for bicycles on the trains. Please include this in your plans.
Thank You
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 158 DETAILS

Status : Initial Action Needed
Creation Date : 12/9/2008
Creator Affiliation :
First Name :
Last Name :
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96813
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 12/09/2008
Submission Content/Notes : I have no been a fan of Charles Djou, but I agree with him that construction on the rail project should begin in town. It is folly for us to begin it in West Oahu. Based on letters that have been published in the newspapers as well, there doesn't seem to be much disagreement on this issue. I can understand that construction will cause a lot more headaches in town than it will in West Oahu, but it is just common sense to start the construction in town. The rail will not be needed in West Oahu if it never gets to town and rail will definitely be a waste of taxpayer's money then!
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 159 DETAILS

Status : Initial Action Needed
Creation Date : 12/9/2008
Creator Affiliation :
First Name : Arma
Last Name : Oana
Business/Organization :
Address : 2266 Waiomao Rd.
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96816
Email : Oanaa001@hawaii.rr.com
Telephone : 228-1690
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 12/09/2008

Submission Content/Notes : I am in favor of the rail transit being diverted from Salt Lake and taken via the Airport area for the following reasons:
The number of citizen who can be services by the Airport route would serve the greater whole of the island. Those living in the Salt lake area have ample city buses that could take them to a connection site for rail, thus leaving Salt Lake, an already congested area during school hours, with less cars on the road, less construstion interfering with present businesses and again serving a greater population. The inclusion of runing the rail from Kalaeloa Blvd., whould even allow those in the homeless transition chelters a cheaper means of transport (instead of using their cars) and yet ample tranportation to Honolulu and work sites. The inclusion of UH Manoa, is a no brainer...let the rail take the people where they need to be! By providing ample tranportation to Manoa, rail will serve students who do not drive, cars can be left home for those who do and thus still saving all money! The extention to Waikiki. our source of revenues...tourism. The tourist already hear that Honolulu has one of the best City Bus systems in the USA, we rank high in terms of money saved instead of driving and providing the rail can provide a sense of safety for those moving about the island without knowing dangerous areas for tourist. More tourist traveing to the West side could mean better sales and job opportunities on the West side to cater to tourist from Waikiki. The proposed route change (via Airport) also allows for access to specific points of interest, Kapolei: the second city and soon to be new Family Court/Detention Services locations, Ewa Beach: reducing the already terrible traffic there, Waipahu and the outlet stores, Pearl City/Aiea, access to Pearl harbor, the mighty Mo and aloha Stadium for sports or swaps meets or concert events, The Airport area; just getting to the airport without having to bring your car, Kalihi/Honolulu to serve workers, Historical places such as access to the Palace, museums and gardens, District Courts and many meeting/business areas. Finally of course Ala Moana Center, which we all hope will still exist by the time rail is completed.
I may be retired by time the rail is completed, but that I still have reasons to travel out of Honolulu to get to the West side, which does not happen often enough now because of traffic, the long drive and gas. I believe those supporters of rail are realistic and looking to the future, maybe my grand kids or even theirs..we need to plan for the next 100 years and take lessons learned form the last 50 years!
Please consider my comments and opinion when making final decisions for Rail Transit and its final route.
Mahalui Loa,,,Arma Oana

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 160 DETAILS

Status : Initial Action Needed
Creation Date : 12/9/2008
Creator Affiliation :
First Name : Richard
Last Name : Mori
Business/Organization :
Address : 94-742 Kaaka Street
Alternative Preference :
Apt./Suite No. :
City : Waipahu
State : HI
Zip Code : 96797
Email :
Telephone :
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 12/09/2008
Submission Content/Notes : The Rail stations at a minimum should be prewired for video surveillance, emergency pull boxes and future solar panels to save on installation costs later. Preplanning ahead of time will save the taxpayers money in the long run.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 161 DETAILS

Status : Initial Action Needed
Creation Date : 12/9/2008
Creator Affiliation :
First Name : Chris
Last Name : Jansen
Business/Organization :
Address : 95-205 Paeheu Pl.
Alternative Preference :
Apt./Suite No. :
City : Mililani
State : HI
Zip Code : 96789
Email : chris398_@hotmail.com
Telephone : 808-626-5841
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 12/09/2008
Submission Content/Notes : I believe that the Rail Transit route should go to the airport and not through Salt Lake. Our economy depends on Tourism and this would help tourists adjust better to our big city atmosphere as they make their way to their Waikiki hotels. Sure taxi drivers and others in the transportation business won't like this. But our government has to look "at the big picture" here and do the right thing. I also feel that the beginning construction and operation of transit should start in a more heavily populated area. Such as Aiea to downtown. And NOT starting from Kapolei with construction and operation heading Eastward. "Biggest bang for the buck" and not catering to political special interests! Please! No more talk and studies. Just do it! Mahalo
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 164 DETAILS

Status : Initial Action Needed
Creation Date : 12/9/2008
Creator Affiliation :
First Name : Maurice
Last Name : Morita
Business/Organization : Neighborhood Board #18
Address : 1142 Ala Aloalo Street
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96818
Email : mmorita@hsta.org
Telephone : 808-225-0326
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/09/2008
Submission Content/Notes : I am in favor of the Salt Lake rail route instead of the airport route. Keeping the Salt Lake route will cost less rather than going to the airport. The spur to the airport from Salt Lake will cost less than if there was a spur from the airport to Salt Lake. The airport route should be considered when the decision to spur to Waikiki is made. If the purpose is to help relief traffic from Leeward and Central Oahu, there is more population density in the Salt Lake area vs. the airport which is mostly commercial and military which would help with the traffic congestion we have now. With the economy in recession, the cost should be considered when making the final decision as to the rail route. This is why I am in favor of keeping the Salt Lake rail route.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 165 DETAILS

Status : Initial Action Needed
Creation Date : 12/9/2008
Creator Affiliation :
First Name : Byron
Last Name : Muramatsu
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96789
Email : bmuramatsu@hotmail.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/09/2008

Submission Content/Notes : I agree with Charles Djou that the rail system should start in town and build out to Kapolei. The reason being income generating and ridership. There would be more people using the rail system starting from town because of the population base. Secondly with more people riding the rail there will be more revenues generated to off set the cost of building the rail. Another point I would like to make is the Airport route is more favorable vice the Salt Lake route. Every major city has a rail system that incorporates the airport as a significant stop because of the people traffic. No one other than the Salt Lake residence would want to drop off or get on at a Salt Lake rail stop. On the other hand all of the people of Hawaii from the neighboring islands as well as the windward side of Oahu would consider using an airport rail stop sometime in their life. The airport rail stop could be a means of transportation to get to an overnight stay at any hotel. The rail stop could be a means of avoiding the Middle street and Punahou Street road traffic bottleneck. The Rail System has been approved by the State of Hawaii now lets build it in the most practical way possible where all the people of Hawaii can get to see and use the system as soon as possible. No more studies, no more discussions, let's start breaking ground and get to work.

Reply Requested :
Submission Type : Draft EIS Comment

RECORD # 166 DETAILS

Status : Initial Action Needed
Creation Date : 12/9/2008
Creator Affiliation :
First Name : richard
Last Name : wasnich
Business/Organization : kaa limited partnership
Address : 401 kamakee st
Alternative Preference :
Apt./Suite No. : 314
City : honolulu
State : HI
Zip Code : 96814
Email : rwasnich@gmail.com
Telephone : 808 398 2631
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/09/2008
Submission Content/Notes : 1. I am a strong supporter of rail transit.
2. I understand the rationale for starting construction in Kapolei, related to space for a base yard.
3. However I think the city should do whatever required to start at Ala Moana and work out towards Ewa.
4. First, there will be income from the core traffic, which will not result from Kapolei to Waipahu.
5. Second, if funding or other obstacles occur (perhaps I should say WHEN, not IF), we will have a usable system.
6. Third, when Pearl City is reached, there will be a significant impact on traffic from Ewa, which will build and sustain the political support needed for this multi-year project.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 167 DETAILS

Status : Initial Action Needed
Creation Date : 12/10/2008
Creator Affiliation :
First Name : Buzz
Last Name : Hong
Business/Organization : HI Building & Construction Trades
Address : 560 N. Nimitz Highway, #50
Alternative Preference :
Apt./Suite No. : 215A
City : Honolulu
State : HI
Zip Code : 96817
Email : hibuildingtrades@yahoo.com
Telephone : 808-524-2249
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/10/2008

Submission Content/Notes : December 9, 2008

Department of Transportation Services
City & County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

RE: IN SUPPORT OF DRAFT EIS
HONOLULU HIGH-CAPACITY CORRIDOR PROJECT
Public Hearings: December 9th – 11th, 2009

Dear Department of Transportation Services:

For the record my name is Buzz Hong, the Executive Director for the Hawaii Building & Construction Trades Council, AFL-CIO. Our Council is comprised of 16-construction unions and a membership of 26,000 statewide.

The Council supports the Draft EIS for the Honolulu High-Capacity Corridor Project, which as part of an integrated mass transit system, is an investment in Oahu's future – growing our economy, protecting our environment, strengthening our communities, and providing reliable and affordable transportation for generations to come.

Thank you for the consideration of our request.

Sincerely,

William "Buzz" Hong

Yes

Draft EIS Comment

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

COMMENTS OF MARK TAYLOR ON
DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR HONOLULU RAIL TRANSIT PROJECT

December 9, 2008

Thank you for the opportunity to submit comments on the Draft EIS for the Honolulu Rail Transit Project. My name is Mark Taylor. I reside in the Salt Lake neighborhood of Honolulu and served from 1993 to 2007 as an elected member of the Aliamanu-Salt Lake-Foster Village Neighborhood Board.

I have three comments on the Draft EIS.

First, the opening paragraph of section 6.4.2 of the Draft EIS (entitled "Project Cash Flow") states that both the "Salt Lake and Airport Alternatives would be financially feasible." Yet this same paragraph states that the Airport Alternative would require \$1.4 billion in Federal funding, and that the FTA "has not been approached to consider the \$1.4 billion for the Airport Alternative."

Given that there is no indication that Federal funding at the \$1.4 billion level will even be considered by the FTA, how can the Draft EIS state conclusively that the Airport Alternative is "financially feasible"? Unless and until the FTA indicates in writing that it is willing to consider providing \$1.4 billion, the EIS should state that the Airport Alternative has not been shown to be financially feasible. To do otherwise is misleading and invites a fiscally imprudent policy decision on the initial transit alignment.

Second, Table 7-2 of the Draft EIS (entitled "Effectiveness of Alternatives in Improving Corridor Mobility") contains figures that appear questionable, if not incorrect.

- The table indicates that Transit Ridership in 2030 will be only 1% higher for the Airport Alternative than for the Salt Lake Alternative. Yet, it also indicates that Transit User Benefits will be 5% higher for the Airport Alternative than for the Salt Lake Alternative. This significant inconsistency should be either corrected or fully explained.
- The Airport Alternative's purported 5% advantage in Transit User Benefits equates to reduced travel time for all transit users of 800,000 hours per year compared to the Salt Lake Alternative. Yet, the Draft EIS indicates the Airport rail route actually takes longer to traverse than the Salt Lake rail route. In fact, assuming half of projected daily rail trips in 2030 include the portion of the system between Aloha Stadium and Middle Street, the Airport Alternative will increase travel time for rail users by over 500,000 hours per year¹. How can the Airport Alternative *decrease* travel time for *all* transit users by 800,000 hours per year when it *increases* travel time for *rail* transit users by 500,000 hours per year? Again, this significant inconsistency should be either corrected or fully explained.

Third, Table 7-7 of the Draft EIS (entitled "Cost-effectiveness of the Build Alternatives") indicates the Salt Lake Alternative is more cost-effective than the Airport Alternative, but only by a small margin. The figures in this table are derived by dividing the cost of the system under each build alternative by the number of hours of Transit User Benefits it produces. Therefore, if in fact there are any revisions to the Transit User Benefits in Table 7-2 in light of the discrepancies identified above, Table 7-7 should also be revised to reflect the impact on the relative cost-effectiveness of each build alternative.

Thank you again for the opportunity to comment.

¹ 90,000 projected daily trips multiplied by 1/2, multiplied by 2 minutes longer per trip, multiplied by 365 days per year, divided by 60 minutes per hour, equals 547,500 hours.

Honolulu High-Capacity Transit Corridor Project

Welcome to the Honolulu High-Capacity Transit Corridor Project's Public Hearing for the Draft Environmental Impact Statement/Section 4(f) Evaluation.

This public meeting and hearing has been designed to inform the public about the transit project, explain materials contained in the Draft EIS, answer questions from the public, and collect public input on project issues related to the Draft EIS, Section 106 of the National Historic Preservation Act, Section 4(f) of the U.S. Department of Transportation Act, and floodplains affected by the project.

Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulustransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulustransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: Bob KILTHAU

Address: 1310 HALOA DR
FOSTER VILLAGE

Phone: 422 6149

Honolulu HI 96818

E-mail: vakaloha@yahoo.com

Comment(s):

SALT LAKE BLVD IS NOT THE BEST ROUTE!
The construction period will cause traffic disruption
all along S.L. BLVD. & affect Radford HS, & Makalapa
Elementary School.
operation on the rail along S.L. BLVD will be
affected ~~by noise~~ The schools with noise.
F.V. & Aliamano Residents will NOT
have transit stops. They will have to
go to the stadium to get onboard.
Too much noise & congestion!

I wonder why no politicians showed
up for the Salt Lake Blvd meeting?
I won't be voting for my
Councilman! He should have been
at the meeting!

-----FOLD-----

Return Address

Place
Postage
Here

Department of Transportation Services
Attn: Honolulu High-Capacity Transit Corridor Project
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI, 96813

STAPLE HERE

Honolulu High-Capacity Transit Corridor Project

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Name: Homer A. Chang Address: 5210 LIKINI ST. #405
Phone: 839-4538 Honolulu, HI 96818
E-mail: None

Comment(s):

I have no objections to the route going thru
the airport from Aloha Stadium to downtown. It would
be nice to have a shuttle from Salt Lake to the
airport.

Return Address

Homer A. Chang
5210 Lihini St. #405
Honolulu, HI 96818

Place
Postage
Here

FOLD

Department of Transportation Services
Attn: Honolulu High-Capacity Transit Corridor Project
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI, 96813

STAPLE HERE

RECORD # 172 DETAILS

Status : Initial Action Needed
Creation Date : 12/11/2008
Creator Affiliation :
First Name : Paul
Last Name : Hooper
Business/Organization : UHM (ret)
Address : 700 Richards St.
Alternative Preference :
Apt./Suite No. : 2406
City : Honolulu
State : HI
Zip Code : 96813
Email : hooper@hawaii.edu
Telephone : 341-3136
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 12/11/2008
Submission Content/Notes : Having been loosely associated with rail transit matters since the time of the initial Fasi proposal, I am a strong supporter. Major cities simply cannot function well over the long term without some version of off-grade rail transit. However, I also believe the present proposal should be modified in several ways. First, in light of the immense cost involved, it should be made clear that no ground will be broken until there is iron-clad assurance that all possible Federal support (including new prospects presently under discussion) will be available. Second, construction of the system should follow the classic pattern and be built from the city core outward rather than as currently planned. There are several reasons this makes good sense. Particularly if some future event--economic or other--were to cause a halt in the project, it would be far preferable to have a segment serving the urban core instead of one starting in Ewa and stopping in Waipahu or Pearl City. The project definitely should be moved ahead but not so rapidly that overly hasty decisions are made.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Honolulu High-Capacity Transit Corridor Project

Welcome to the Honolulu High-Capacity Transit Corridor Project's Public Hearing for the Draft Environmental Impact Statement/Section 4(f) Evaluation.

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Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulutransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulutransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: Jane Au

Address: 3415 Kalukalo Wy

Phone: 839-7064

Hon HI 96815

E-mail: _____

Comment(s):

I still favor the 'No Build' solution; after that the airport route

Honolulu High-Capacity Transit Corridor Project

Welcome to the Honolulu High-Capacity Transit Corridor Project's Public Hearing for the Draft Environmental Impact Statement/Section 4(f) Evaluation.

This public meeting and hearing has been designed to inform the public about the transit project, explain materials contained in the Draft EIS, answer questions from the public, and collect public input on project issues related to the Draft EIS, Section 106 of the National Historic Preservation Act, Section 4(f) of the U.S. Department of Transportation Act, and floodplains affected by the project.

Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulutransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulutransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: Zoe JARVIS

Address: P.O. Box 1644

Phone: 808-696-3369

Waianae HI 96792

E-mail: _____

Comment(s):

We need a second road from Waianae to Kapolei to provide access to the train/rail project. I back the rail thru Pearl area and airport into town, eventually to Manoa Univ. of HI. Please start in Kapolei area so you can start earlier as there is plenty of area to work on the construction.

RECORD # 175 DETAILS

Status : Initial Action Needed
Creation Date : 12/11/2008
Creator Affiliation :
First Name :
Last Name :
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96797
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 12/11/2008
Submission Content/Notes : I agree with Charles Djou. I would like to see the rail route moved to the airport & the first segment start in Honolulu & move up to either Aloha Stadium or Pearl Ridge. Also, it is critical that you locate the changing station in the most convinient & safest parts of the community or the only people who will be using the rail will be low income & homeless.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 176 DETAILS

Status : Initial Action Needed
Creation Date : 12/11/2008
Creator Affiliation :
First Name : Mark
Last Name : van der Leest
Business/Organization :
Address : 3031 New Brighton Gardens SE
Alternative Preference :
Apt./Suite No. :
City : Calgary
State : CA
Zip Code : 92234
Email : mvdleest@shaw.ca
Telephone : 403-284-1171
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/11/2008
Submission Content/Notes : I've been a Rail Traffic Controller in Calgary, Alberta, Canada (home of North America's busiest and most successful light rail transit system) for 4 years. I think that this Rail project can be a great success and really make a positive change for Honolulu. I'm interested in the development of the system, and keeping informed so I know when I can apply for a job and help develop a system from the ground up.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 178 DETAILS

Status : Initial Action Needed
Creation Date : 12/11/2008
Creator Affiliation :
First Name : Claudia
Last Name : Webster
Business/Organization :
Address : 14 Aulike St., #305
Alternative Preference :
Apt./Suite No. : 305
City : Kailua
State : HI
Zip Code : 96734
Email : clwswim@hawaii.rr.com
Telephone : 808-262-6243
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/11/2008
Submission Content/Notes : Yes, I am in favor of the proposed rail system. I would think it more practical to start in downtown Honolulu and build out rather than starting in the west and building in. I lived in Portland, Oregon for 30 years. During that time the MAX lightrail system was built and expanded. It is a wonderful addition to city transportation. I remember when it was started in downtown as I was working there. It was a mess, but we all survived. And over the years additional spurs have been added. So from my experience in Portland and riding light rail in other cities I enthusiastically support light rail. Claudia L. Webster--have lived in Kailua for almost 2 years now.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 179 DETAILS

Status : Initial Action Needed
Creation Date : 12/11/2008
Creator Affiliation :
First Name : Clifford
Last Name : Mercado
Business/Organization :
Address : 91-911 Nohoioh'ewa Place
Alternative Preference :
Apt./Suite No. :
City : Ewa Beach
State : HI
Zip Code : 96706
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 12/11/2008
Submission Content/Notes : I THOUGHT I MADE THIS CLEAR TO MUFU HANNAMAN AND ALL OF HIS HENCHMEN. BUT I GUESS I DID NOT SUCCEED. THEY USED MY TAX MONEY TO ADVERTISE THEIR SIDE OF THE STORY AND GOT THE MEASURE PASSED BY A BUNCH OF ILLEGALLY MAL- INFORMED VOTERS. I AM NOW GOING TO ASK YOU TO HEAR MY PLEA.

WE DO NOT NEED THIS FORM OF TRANSPORTATION (THE TRAIN) AND I DON'T WANT YOU OR ANY ONE ELSE TO SPEND A DIME ON THIS LAME IDEA. SO DO WHAT YOU CAN TO SQUASH THIS PROJECT.

THE GOVERNOR, MR. PANOS AND MRS. KOBAYASHI HAVE THE RIGHT IDEA.....A RAISED ADDITION ABOVE THE EXISTING FREEWAY WILL DO THE JOB CORRECTLY.

MERRY CHRISTMAS

CLIFFORD D. MERCADO
Introhaw@lava.net

Reply Requested :
Submission Type : Draft EIS Comment

RECORD # 181 DETAILS

Status : Initial Action Needed
Creation Date : 12/12/2008
Creator Affiliation :
First Name : Ernest
Last Name : Brezeale
Business/Organization :
Address : 91-1008 Makaike street
Alternative Preference :
Apt./Suite No. :
City : ewa
State : HI
Zip Code : 96706
Email : brezealee001@hawaii.rr.com
Telephone : 808 554-6249
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/12/2008
Submission Content/Notes : Please realign rail route through airport. As a airport employee I would use the rail to commute to and from work.

Mahalo
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 183 DETAILS

Status : Initial Action Needed
Creation Date : 12/12/2008
Creator Affiliation :
First Name : Daren
Last Name : D
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : WA
Zip Code : 00000
Email : cooldster@hotmail.com
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 12/12/2008
Submission Content/Notes : Hawaii has a very strong natural tropical and green environment. Why would you opt for conventional trains elevated when a monorail is the most suitable technology for such beautiful setting? Just take a look at Okinawa's monorail.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 184 DETAILS

Status : Initial Action Needed
Creation Date : 12/13/2008
Creator Affiliation :
First Name : Nancy and Errol
Last Name : Rubin
Business/Organization :
Address : 594 Alihi Place
Alternative Preference :
Apt./Suite No. :
City : Kailua
State : HI
Zip Code : 96734
Email : nsrubin@aloha.net
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 12/13/2008
Submission Content/Notes : Dear Friends,

We are very much in favor of adding the airport connection immediately and to start phase one of building from Pearl City to Honolulu proper.

Thank you for receiving our input.

Much aloha,

Nancy and Errol Rubin

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 185 DETAILS

Status : Initial Action Needed
Creation Date : 12/15/2008
Creator Affiliation :
First Name : Jeff
Last Name : Neely
Business/Organization : GSA
Address : 450 Golden Gate Avenue (9P)
Alternative Preference :
Apt./Suite No. :
City : San Francisco
State : CA
Zip Code : 94012
Email : jeffrey.neely@gs.gov
Telephone : 4155223100
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/15/2008
Submission Content/Notes : I have questions and concerns about the proposed routing, the proximity of the proposed line to the United States Courthouse and the lack of involvement or coordination with my agency.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 186 DETAILS

Status : Initial Action Needed
Creation Date : 12/15/2008
Creator Affiliation :
First Name : David
Last Name : Mongold
Business/Organization :
Address : 60 N Beretania
Alternative Preference :
Apt./Suite No. : 1502
City : Honolulu
State : HI
Zip Code : 96817
Email : mongold@hawaii.edu
Telephone : 524-1104
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 12/15/2008
Submission Content/Notes : I support the project.
I prefer the airport route.
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Honolulu High-Capacity Transit Corridor Project

Welcome to the Honolulu High-Capacity Transit Corridor Project's Public Hearing for the Draft Environmental Impact Statement/Section 4(f) Evaluation.

This public meeting and hearing has been designed to inform the public about the transit project, explain materials contained in the Draft EIS, answer questions from the public, and collect public input on project issues related to the Draft EIS, Section 106 of the National Historic Preservation Act, Section 4(f) of the U.S. Department of Transportation Act, and floodplains affected by the project.

Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulutransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulutransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: DANNY MURRAY Address: 3034 Kaula Dr
Hm - Hk 96815
Phone: _____
E-mail: _____

Comment(s):

^(30-120 feet) TRANSIT
An elevated RAIL system for Oahu will
be difficult ^{to board} for passengers with difficulty in
walking - the senior citizens / handicapped / wheel chaired.
It will also be very difficult for passengers
who are deadly afraid of heights. I know 2
persons who have this phobia, and have seen them
go through a very nerve wrecking experience
hugging the wall, walk very slowly with their
eyes closed. Imagine if passengers with this
phobia need to ride the RAIL TRANSIT at
30-80-120 feet high, it will be very difficult
to get this passenger on board so others may board
to be on time.

OVER
page
to In Guard - these
passage - should
be all the
also

#2 - Population shift in 2020-2030 many
 Baby Boomers will have retired from active work, ~~many~~ children and grand children would be driving to work & other destinations. The question to address, is will they use the public RAIL TRNSIT or use their computers from their homes. They may be in the town - as they may be in the computer using public mass transit. back on the RAIL - still on street system prepared for order.

Return Address

Dany NURA
 3039 Kaunaoa St
 Honolulu, HI 96815

Place Postage Here

Department of Transportation Services
 Attn: Honolulu High-Capacity Transit Corridor Project
 City and County of Honolulu
 650 South King Street, 3rd Floor
 Honolulu, HI, 96813

STAPLE HERE

Honolulu High-Capacity Transit Corridor Project

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Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulustransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulustransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: Sally Mist Address: 2747 Paehonua
Phone: 988-4567 HNL 96822
E-mail: sallymmist@aol.com

Comment(s):

I feel that the initial plan should be from Pearl City to Waikiki via the airport. Many hotel employees live in the ~~the~~ Leeward area, the maintenance facility & parking area at the Pearl City end & it would provide for the needs of many residents since Waikiki has many bus feeder routes.

Honolulu High-Capacity Transit Corridor Project

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Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulustransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulustransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: Shirly Lin Address: Kalaka Home
Phone: 946-9138
E-mail: o

Comment(s):

I am for High-Speed Transit project
for Improve Hawaii Traffic problem.

I am for the Route from Airport
the change from Solt Lake.

I think is Good Project.
Go for it. !! Aloha.

Honolulu High-Capacity Transit Corridor Project

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Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulustransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulustransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: Lennette Hinton

Address: 860 Halekaiwila St

Phone: _____

Honolulu HI

E-mail: _____

96813

Comment(s):

DO NOT LIKE THE RAIL STATION
IN FRONT OF 860 Halekaiwila St..
Very unsightly! Very unhappy
with current plans.. Waianae
needs rail more than Halekaiwila
No rail on Halekaiwila - Sorry!

Honolulu High-Capacity Transit Corridor Project

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Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulustransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulustransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: LESLIE A AMONG Address: 1720 ALA MOANA BLVD-E103

Phone: 808-779-3617 HON, HI, 96815

E-mail: LESLIE.A.MONG@YAHOO.COM

Comment(s): MEMBER OF WAIKIKI NEIGHBORHOOD BOARD DISTRICT-9
I PROPOSED A NEW ROUTE AT MY LAST NEIGHBORHOOD
BOARD MEETING FOR THE TRANSIT CORRIDOR PROJECT FROM
ALA MOANA CENTER TO ALA WAI CANAL MAUKA SIDE DOWN TO THE
HARD ROCK CAFE AS A TRANSIT STATION THAT PROPERTY HAS BECOME
AVAILABLE. CONTINUE UP ALA WAI CANAL MAUKA SIDE TILL YOU
HET MANOA PALOLO STREAM HEAD UP ALL THE WAY TO UH CAMPUS
THIS ROUTE WILL BE THE BEST WAY TO AVOID LEGAL BATTLES,
AND A GOOD WAY TO FIND COMMON GROUND FOR ALL THE RESIDENTS
I WILL BE HAPPY TO SHARE THIS IDEA WITH ALL CONCERNED.

MAHALO, Les A Among - WNB #9



December 8, 2008

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

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

Dear Messrs. Matley and Yoshioka:

The Honolulu Chapter of the American Institute of Architects (AIA Honolulu) strongly supports the concept and implementation of a fixed guideway steel-on-steel rail system as an integral part of the future plans to meet the needs our growing island communities. We therefore offer the following comments and recommendations to assist the City in strengthening community support, enhancing our neighborhoods and environment, investing taxpayer money wisely, and ensuring Federal funding for the project.

Review of Project Goals and Objectives

A recent study by AIA National and the Center for Transportation Studies found that ***“the success of transportation projects requires integrating transportation design with social, economic, and cultural resources. The time for looking at transportation projects through the single lens of mobility, or even simple access and connectivity, is long gone.”*** However, Chapter 1 of the Draft EIS outlines project goals and objectives that are focused almost exclusively on mobility concerns.

AIA Honolulu therefore recommends that the current project goals should be expanded and integrated with stronger community-planning objectives. We encourage the use of social, environmental, and aesthetic criteria – as well as economic efficiency – in the planning and design of transit system routes and supporting facilities. Transit system routes and facilities should further support land use objectives – including urban growth management and efficient transit mode linkages – and respect significant human, cultural and natural environments as defined by the City’s Primary Urban Center Development Plan.

Other cities such as Portland, Salt Lake, and Sacramento have wisely integrated transportation, social, economic, and cultural objectives during the EIS process and as a result have built popular rail transit systems which not only transport people efficiently but also create desirable, livable communities. This emphasis on the bigger picture can best be summed up by the transit-planning protocol followed by Portland since the 1970’s: ***“We define what kind of place we want to be and then identify the appropriate transportation options to serve it.”***

Likewise, it is our understanding that the Federal Transportation Administration’s evaluation criteria for New Starts funding goes well beyond measuring mobility improvements. According to its *New Starts and Small Starts Evaluation and Rating Process*, proposed projects are graded against the full range of the following justification criteriaⁱⁱⁱ:

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Honolulu, Hawaii 96813-4452
Phone: 808.545.4242
Fax: 808.545.4243
Website: www.aiahonolulu.org

- **Transit Supportive Land Use Policies and Future Patterns**
- **Environmental Benefits**
- **Cost Effectiveness**
- **Mobility Improvements**
- **Operating Efficiencies**

We similarly recommend that the Honolulu Rail Transit project goals and objectives be amended to align closely with these key criteria in order to ensure qualification for Federal funding.

Additionally, because our island economy remains heavily dependent upon tourism, we feel it essential that the project objectives should address minimizing economic impact to the visitor industry and to our island's visual appeal. For instance, views from cruise ships and visitors' visual expectations of Hawaii, Honolulu, and Waikiki should be considered.

Review of Project Impacts

AIA Honolulu has also carefully reviewed the Draft EIS in relation to our chapter's public policies on transportation. We respectfully offer the following comments regarding the impacts an elevated guideway will have to our communities.

The City and County of Honolulu's Primary Urban Center Development Plan (PUC) is a comprehensive planning document mandated by the City's Charter to guide "the development and improvement of the City" into the year 2025.^{iv} The PUC clearly defines guidelines to "**preserve and enhance significant mauka or makai view corridors along major collector streets.**"^v Unfortunately, the proposed elevated rail structure will block mauka and makai view corridors particularly along Nimitz Highway through historic Chinatown and Downtown. Although the PUC provides criteria for protecting mauka views from the Ala Wai promenade^{vi}, the Draft EIS does not address visual impacts along the planned elevated segment serving the University of Hawaii at Manoa.

In addition, the PUC notes "**as demonstrated in leading cities throughout the world, recapturing visual and physical access to the urban waterfront can stimulate economic renewal and be a source of civic pride.**"^{vii} Examples of popular waterfront destinations that have removed their elevated transportation structures include San Francisco, Boston, Seattle, and Sydney. The PUC goes on to stress that a major impediment for Honolulu is Nimitz highway that "**effectively acts as a physical and visual barrier cutting off the waterfront from mauka pedestrian travel.**"^{viii} Elevated rail stations and structures along the waterfront will make a poor situation worse by introducing an additional physical and visual barrier. This will largely undo the tremendous past efforts by the State Department of Transportation to reintegrate the Aloha Tower with the rest of Downtown Honolulu.

AIA Honolulu also promotes the preservation and enhancement of historic and cultural districts such as Chinatown and the Hawaii Capital District. Our understanding is that the elevated Chinatown station and guideway structures would be approximately 40-50 feet above grade.^{ix} We therefore respectfully disagree with the finding that the elevated system will pose "no adverse effect" to our historic districts^x particularly when the Draft

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Fax: 808.545.4243
Website: www.aiahonolulu.org

EIS states that ***“the project elements would contrast substantially with Chinatown’s historic character”^{xi}*** and that through the Downtown area ***“the bulk and scale of the guideway would contrast with the more pedestrian scale [and] character of the streetscape.”^{xii}***

We are deeply concerned that despite documenting many of the significant visual and aesthetic impacts of the elevated guideway, the Draft EIS fails to propose mitigation measures to effectively counteract negative impacts on views, connection with the waterfront, historic districts, and pedestrian streetscapes. AIA Honolulu also recommends that rather than providing selective, localized views of the transit guideway and stations, broader visualization studies should also be performed. Panoramic mountain and waterfront views as defined by the PUC should be shown, keeping in mind the potential economic impact upon our tourist industry.

The AIA further advocates the creation of safe, healthy, and easily accessible environments for transit passengers as well as pedestrians and residents along the transit route. We are concerned that the areas below elevated rail structures and stations will become blighted, “nuisance” environments and that the lack of natural public sightlines into stations will diminish safety and security for passengers waiting on platforms. The proposed elevated platforms and concourses will also impede convenient access for both able-bodied and disabled users.

Finally, the AIA promotes sustainable planning, design, and operation of transit systems. Economic efficiency is also essential. The Draft EIS notes that it will take over 7 times the energy to construct an elevated guideway compared with an at-grade system.^{xiii} We wish to also emphasize that an elevated guideway will require substantially greater amounts of materials, construction, and time in comparison with at-grade systems. Similarly, elevated systems require increased electrical consumption to power elevators, escalators, and additional lighting. Increased and ongoing operating and maintenance costs for public restrooms, painting, graffiti mitigation, and landscaping should also be accounted for in life cycle cost estimates. AIA Honolulu therefore considers an elevated system to be the least sustainable and cost effective option available to our communities.

Recommendations

For these reasons, AIA Honolulu urges the City to consider a more flexible rail transit solution capable of running at, below, or above grade to accommodate the particular conditions within each community. Third rail technology should not be our only option. Widely used alternatives such as overhead lines would allow much greater flexibility and would more effectively accommodate social, economic, cultural, and community planning objectives. Flexible transit solutions would also more easily satisfy the FTA’s funding justification criteria for:

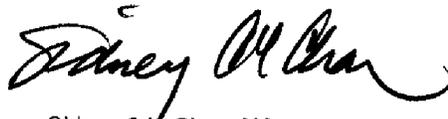
- Transit Supportive Land Use Policies and Future Patterns
- Environmental Benefits
- Cost Effectiveness
- Mobility Improvements
- Operating Efficiencies

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Honolulu, Hawaii 96813-4452
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Fax: 808.545.4243
Website: www.aiahonolulu.org

Impacts to our visual, historic, and cultural resources would be mitigated. There would be fewer detrimental consequences for our tourist industry. More of the cultural indigenous character of our communities, neighborhoods, and pedestrian streetscapes would be preserved or even enhanced. Sustainable objectives would be more easily achieved with lower requirements for energy, material, construction, time, and cost. In comparison with elevated systems, at grade systems would require less taxpayer funding and offer greater flexibility and affordability in planning for future extensions.

AIA Honolulu sincerely thanks the City and County of Honolulu for this opportunity to offer our comments and recommendations publicly. We have enjoyed greater dialogue with the City on transit issues in recent months and we reaffirm our willingness to work together with the Mayor, his administration, its consultants, and the City Council on developing viable and effective regional community planning and urban design solutions for this historic project, including the possibility of alternative mass transit corridors.

Sincerely Yours,



Sidney C. Char, AIA
President AIA Honolulu

ⁱ Moving Communities Forward, p. 44

ⁱⁱ Community Building Sourcebook, Land Use and Transportation Initiatives in Portland Oregon, p. 1-4

ⁱⁱⁱ FY2009 New Starts and Small Starts Evaluation and Rating Process, p. 3

^{iv} Primary Urban Center Development Plan (PUC), p. 1-1

^v PUC, p. 3-12

^{vi} PUC, p. 3-4, 3-5

^{vii} PUC, p. 3-38

^{viii} PUC, p. 3-39

^{ix} Draft EIS, p. 2-24

^x Draft EIS, Table 5-2, p. 5-7

^{xi} Draft EIS, p. 4-77

^{xii} Draft EIS, p. 4-82

^{xiii} Draft EIS, p. 4-159

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Honolulu, Hawaii 96813-4452
Phone: 808.545.4242
Fax: 808.545.4243
Website: www.aiahonolulu.org

RECORD # 194 DETAILS

Status : Initial Action Needed
Creation Date : 12/16/2008
Creator Affiliation :
First Name : kenny
Last Name : smith
Business/Organization : none
Address : 3178 t st
Alternative Preference :
Apt./Suite No. :
City : sacramento
State : CA
Zip Code : 95816
Email : kenny2154@att.net
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/16/2008
Submission Content/Notes : did you ever look at the bay area of BART system?
if you did not see the system you need to look at theres ok please. you
will like it.
Reply Requested : Yes
Submission Type : Draft EIS Comment
**FOIA (Freedom of
Information Request)
Request :**
FOIA Referral Date :
FOIA Response Date :

RECORD # 197 DETAILS

Status : Initial Action Needed
Creation Date : 12/18/2008
Creator Affiliation :
First Name : Glenn
Last Name : Kuhia Jr
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96706
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 12/18/2008
Submission Content/Notes : What ever happened to making Kapolei the second city and wanting to keep west side residents on the west side instead of giving them an alternative to going into town? Why cant we double deck the existing freeway system and open it up to the public for free? no hot lanes or tolls just a double decker freeway. i recently read there will be massive development around all the rail stops, why encourage development and add more people and cars to the road.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 198 DETAILS

Status : Initial Action Needed
Creation Date : 12/18/2008
Creator Affiliation :
First Name : Troy
Last Name : Kimura
Business/Organization : DoE Facility Development Branch
Address : 824 Kinau St
Alternative Preference :
Apt./Suite No. : 812
City : Honolulu
State : HI
Zip Code : 96813
Email : 41tkimura@gmail.com
Telephone : 808-741-4713
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/18/2008
Submission Content/Notes : The first phase of construction should serve the Downtown-Mapunapuna area, not the Kapolei-Waipahu area. The idea is that there will be more riders who use the rail if the destination is the downtown area, and it should provide immediate traffic relief in the Salt Lake, H-1 Middle and Kalihi areas. Each of these areas are severely impacted by current traffic volume because each of them have major highway and freeway interchanges with no room to expand. As someone whos worked as a courier in that area on a daily basis I can tell you first hand that these places are the ones that back everyone else up. These areas also have a high volume of industrial traffic which will benefit greatly from less vehicles in that vicinity which in turn may curb their fuel usage, and help keep costs associated with transportation of their goods at a reasonable rate.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 200 DETAILS

Status : Initial Action Needed
Creation Date : 12/18/2008
Creator Affiliation :
First Name : Ben
Last Name : Ramelb
Business/Organization : Registered Civil Engineer Retired
Address : 1148 Ala Liliko'i St
Alternative Preference :
Apt./Suite No. :
City : Hon
State : HI
Zip Code : 96818
Email : ramelbb001@hawaii.rr.com
Telephone : 839-1620
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/18/2008

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue- Project
Construction Phasing will not provide early traffic relief

Fact:
The rail project construction phasing is proposed in four phases as
discussed on DEIS page 2-38 and as shown on Figure 2-44 as follows:

- East Kapolei to Pearl Highlands (First Construction Phase)
- Pearl Highlands to Aloha Stadium (Second Construction Phase)
- Aloha Stadium to Middle Street (Third Construction Phase)
- Middle Street to Ala Moana Shopping Center (Fourth and final
Construction Phase)

Discussion:
The primary purpose of any mass transit system is to provide traffic relief
and to provide relief in the near term. The major West and Central Oahu
traffic bottlenecks are at the Middle Street merge and at the H-1/H2
merge. Construction phases for the rail should be prioritized to reduce
the traffic bottlenecks at these two locations. Therefore, the project
construction phasing shown above should be reversed:

- Middle Street to Ala Moana Shopping Center (First Construction
Phase)
- Aloha Stadium to Middle Street (Second Construction Phase)
- Pearl Highlands to Aloha Stadium (Third Construction Phase)
- East Kapolei to Pearl Highlands (Fourth Construction Phase)

This revised project phasing is logical because:

- a) The Middle Street to Ala Moana Shopping Center first phase will
provide early traffic relief to the Middle Street bottle neck.
- b) The funding source for the entire 20 mile segment is not guaranteed,
recognizing that the General Excise Tax is not meeting projections in
revenue due to the expected long term slumping economy. The
taxpayer will not tolerate any increase in property tax or GET to fund any
rail fund shortfall.
- c) The funding amount from the Federal Transit Authority is not
guaranteed.
- d) If rail funds are delayed, providing traffic relief to the traffic
bottlenecks on H-1 will be delayed.

e) Each phase for rail will provide the maximum bang for the dollar. The rail will be completely be useable and serve the most number of commuters as each phase is completed. Conversely, the Kapolei to Pearl Highlands would serve very few commuters as most commuters will be destined for east of Pearl Harbor and beyond in the easterly direction.

Vehicle Maintenance and Storage Facility for each construction phase can be temporarily established to support each construction phase as modified:

- a) For the Middle Street phase, some 40 acres could be obtained along Lagoon Drive to include portions of Keehi Lagoon Park, Airport vacant areas and commercial businesses including Budget Car Rental. At least 10 acres for park and ride can be acquired in the airport area alongside Aolele Street and Lagoon Drive.
- b) For the Aloha Stadium phase, portions of the Aloha Stadium Parking lot can be temporarily used for the Storage Facility and temp facilities for vehicle maintenance.
- c) For the Pearl Highlands Phase, a 43-acre vacant site near Leeward Community College is available (DEIS figure 2-42).
- d) A 41-acre site is identified for the Kapolei phase (DEIS figure 2-41).

Conclusion:

Construction of the Middle Street to Ala Moana Phase as a first priority is consistent with providing near-term traffic relief, will initially serve the most number of commuters, will be completely usable and cost effective, and will not force the taxpayer to pay more taxes to fund additional rail segments should rail funding sources not achieve revenue projections.

Recommendation:

The DEIS should reverse the construction project phasing as discussed above starting with the Middle Street to Ala Moana Shopping Center as the First Phase.

Respectfully,

Ben Ramelb P.E.
1148 Ala Lilikoi St
Honolulu, HI
96818

Copy to:

1) Mr. Ted Matley
FTA Region IX
201 Mission St. Suite 1650
San Francisco, CA 94105
FAX 415-744-2726

2) Governor Linda Lingle
Hawaii State Capitol
415 S Beretania St. 5th Floor
Honolulu, HI 96813

FAX (808) 586-0006

3) Honolulu City Council Members
FAX (808) 867-5011

Reply Requested :

Yes

Submission Type :

Draft EIS Comment

**FOIA (Freedom of
Information Request)
Request :**

FOIA Referral Date :

FOIA Response Date :

RECORD # 201 DETAILS

Status : Initial Action Needed
Creation Date : 12/19/2008
Creator Affiliation :
First Name : george
Last Name : plechaty
Business/Organization :
Address : 1380 Lusitana St.
Alternative Preference :
Apt./Suite No. :
City : Honolulu,
State : HI
Zip Code : 96816
Email : georgepechaty@aol.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/19/2008
Submission Content/Notes : Rail is needed ASAP. Long overdue. Airport stop is a no brainer.
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 202 DETAILS

Status : Initial Action Needed
Creation Date : 12/19/2008
Creator Affiliation :
First Name : Jacquelyn
Last Name : Brezeale
Business/Organization :
Address : 91-1008 Makaike st
Alternative Preference :
Apt./Suite No. :
City : Ewa
State : HI
Zip Code : 96706
Email : taimalie@gmail.com
Telephone : 808 554-683
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/19/2008
Submission Content/Notes : Please approve new re-alignment of rail to be routed through Military bases/Airport. As an employee that works in the airport area, I would consider using the rail to commute to work. It would also allive the most traffic from our traffic prone H-1/H2 corridor which I deal with on my daily commute.

Mahalo,
Jackie Brezeale

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 203 DETAILS

Status : Initial Action Needed
Creation Date : 12/19/2008
Creator Affiliation :
First Name : Christian
Last Name : Sorli
Business/Organization :
Address : P O Box 1083
Alternative Preference :
Apt./Suite No. :
City : Kailua
State : HI
Zip Code : 96734
Email : christiansorli@gmail.com
Telephone : 808-262-2262
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/19/2008
Submission Content/Notes : I feel that the Honolulu Transit is one of the best transit projects for Oahu. We are only 20 years too late. We need to move forward quickly to make up for all the lost time. We need to meet with other large cities (ex: Portland) to discuss their pros and cons during their development and operations.

We need to focus on moving the masses of people that overflow the H1 and H2. That is our purpose.

Keeping in mind that any mistakes we make today will cost much more to correct tomorrow. So let's petition input from other cities to make sure we limit any possible mistakes during planning and development.

Christian Sorli
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 204 DETAILS

Status : Initial Action Needed
Creation Date : 12/19/2008
Creator Affiliation :
First Name : deborah
Last Name : agles
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96813
Email : dagles@juno.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/19/2008
Submission Content/Notes : to make the rail a desirable service that will be utilized and truly alleviate the awful leeward traffic mess, I would recommend the following:
Minimal stops with feeder buses or trollys (5-10 stops instead of 20), it has to be time efficient and better than driving or it won't be used. It should extend from downtown Kapolei to UH, via the airport, not Salt Lake. Appropriate stops would be Kapolei, east Kapolei at the Geiger Rd / Waipahu interchange, Leeward college, Pearl Ridge, airport, downtown, ala moana / waikiki, and UH Manoa. I would agree with Mr Dijou that pearl ridge - HNL be built first, that makes much more sense that in an underdeveloped area. Also, I would reconsider the steel wheels, they can be quite noisy, and with the rail traversing residential areas, best to be as quiet as possible. Thanks for the oppertunity to speak my mind.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 205 DETAILS

Status : Initial Action Needed
Creation Date : 12/19/2008
Creator Affiliation :
First Name : Monika
Last Name : Panfiglio
Business/Organization :
Address : 2233 Ala Wai Blvd
Alternative Preference :
Apt./Suite No. : 3B
City : Honolulu
State : HI
Zip Code : 96815
Email : monikabobonica@gmail.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/19/2008

Submission Content/Notes : I have two points I'd like to make about the development of the necessary and majority voted mass transit. The re-routing around Salt Lake and through the airport was a way to trick the residents of Salt Lake to vote for the rail. In actuality, fairness is not met in the goals here, nor the other 5 goals but re-routing around the communities of Oahu. I live in a family owned apartment in Waikiki and have been a personal witness to the unintended consequence of steel rebar rusting within the concrete it's put in. Every 30 years or so, steel on steel (in concrete) will have to be maintained to the point of rendering the whole system as being unreliable and not worth using. There will be so much construction in noise and delays of regular routes that it could render the entire project futile and money wasted. I think that even professionals are baffled by the causes of this phenomenon. (Otherwise they wouldn't build lanai's like the ones all over waikiki today) It could be a combination of steel, salt air (which is unescapeable to Hawaii, salt water (being in proximity to the ocean), we don't even know. And we probably cannot avoid construction continual costs in taxes, and permanent construction. As we have seen in other cities that mass transit is a real and much needed relief to cities congestion and consumption. But all too many times, for example Seattle, if transit hasn't been done right, then the whole project could go bad. In Seattle, they voted to spend the largest amount of money on their dear city (and infrastructure) and 30 years ago invested in the Monorail. The monorail was so expensive (building it on "legs") that it only spanned about 4 blocks downtown (between hotels and shopping malls) No one but tourists (to Seattle, so not that many) use it. And now they are pitted in years of undecided election results because everyone is so burnt out of transits costs (they vote on something, then tax, and then vote to change it and all over again). In Hawaii, we don't have the apathetic voters just yet. And we haven't already invested in bad mass transit infrastructure. We have a hopeful lot that's willing to see a change. So, please don't screw it up.

A registered voter and long time Hawaii resident,
Monika Panfiglio

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 206 DETAILS

Status : Initial Action Needed
Creation Date : 12/20/2008
Creator Affiliation :
First Name : Robert
Last Name : Chang
Business/Organization :
Address : 758-16th Ave
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96816
Email : bobbychang@hawaii.rr.com
Telephone : 733-2818
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/20/2008
Submission Content/Notes : I feel the rail should start in the middle of town and work its way in both directions connecting with the University of Hawaii ASAP. Starting in the middle of a field is less expensive but who wants to ride around in the middle of a field? If ridership is the desired end result it must be built where the riders are. This is also important as with the economy as it is, the tax dollar from excise taxes is not going to be as projected. Raising property taxes, or the excise tax for this project should not be an alternative as people of Hawaii are having a hard enough time as it is. The airport rather than the Salt Lake route is also a better choice. Too bad there isn't a way to do it underground as it will make Oahu very ugly with trains running in the air blocking views and making noise.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 207 DETAILS

Status : Initial Action Needed
Creation Date : 12/20/2008
Creator Affiliation :
First Name : Robert
Last Name : Pereira
Business/Organization : Midas Auto Service
Address : 94-709 Farrington Hwy
Alternative Preference :
Apt./Suite No. : B
City : Waipahu
State : HI
Zip Code : 96797
Email : bob@midashawaii.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/20/2008
Submission Content/Notes : It looks like you plan to use a portion of the property at 1415 Dillingham Blvd. for the project. Can you tell me how you will use the property and how it will affect my business at that location?
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 208 DETAILS

Status : Initial Action Needed
Creation Date : 12/20/2008
Creator Affiliation :
First Name : Paul
Last Name : Tse
Business/Organization :
Address : 155 N. Beretania St.
Alternative Preference :
Apt./Suite No. : 202
City : Honolulu
State : HI
Zip Code : 96817
Email : ptse189@yahoo.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/20/2008
Submission Content/Notes : I have several suggestions for the rail transit system. It's better to start the first phase from downtown honolulu to Pearl City first. I heard that the rail system will be intergrated with TheBus , TheBoat. Hybrid buses will also be use in this project instead of diesel buses. The reason why is that the buses will reduce greenhouse gases.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 210 DETAILS

Status : Initial Action Needed
Creation Date : 12/22/2008
Creator Affiliation :
First Name : jake
Last Name : cargas
Business/Organization :
Address : mokauea st.
Alternative Preference :
Apt./Suite No. :
City : honolulu
State : HI
Zip Code : 96819
Email : chrysler_87@yahoo.com
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 12/22/2008
Submission Content/Notes : 2018 is way too LONG!
why would they start the construction in the west side? isn't that weird? shouldn't they build at the most populated area to serve many people? if they build along waipahu to aloha stadium, and kalihi to chinatown, that would benefit most of the people beauce that is where the congestion starts.

if they start in the left most area, who will benefit from that if they are traveling to the downtown honolulu? they still have to ride the bus and still pass waipahu, kalihi, etc...

and besides, people from the center area are the ones who get unfair treatment. they have to wait for the buses from the west and the moment thus buses arrive, there's no more available seat and everything. western peopl already have "the boat" and the "Express buses", well if they ride from the west area and wants to go downtown, it will be nice if they stops at the center and ride the rail through downtown.

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :

From: BakiProp@aol.com [mailto:BakiProp@aol.com]
Sent: Wednesday, December 10, 2008 10:30 PM
To: Yoshioka, Wayne
Subject: No Subject

I am against the rail, especially now. We are going broke, even without this new cost where is the money going to come from?
Robert Thomas

Make your life easier with all your friends, email, and favorite sites in one place.
Try it now.
(<http://www.aol.com/?optin=new-dp&icid=aolcom40vanity&ncid=emlcntaolcom00000010>)



PHT, Inc. dba

Polynesian Hospitality

Re Honolulu's proposed rail

The Honolulu City Council's chosen Locally Preferred Alternative was projected to cost \$4.5 billion in 2006 dollars. The City is planning on receiving \$1.2 billion from the Federal Transit Administration (FTA), a figure that has never been granted before even to NY City or Los Angeles but based on promises by the Hawaii congressional team, especially Representative Abercrombie. I'll believe the Representative Abercrombie only when the money is actually delivered considering the current strain on federal budget.

During the months preceding the recent elections, a blitzkrieg of radio, newspaper, TV and mailed advertising (at last count stood at about four million dollars) which included gross misrepresentations at taxpayer expense (see Appendix A) resulted in 50.6% of the voters on the November 4, 2008 elections voting yes for the rail city charter amendment.

Worse yet, the general excise tax surcharge on Oahu that is collected in support of a Fixed Guideway project is collecting much less taxes than expected for two years in a row due to the severe downturn in tourist arrivals. Thus the city is heading into a financial crisis if this system begins construction.

The proposed rail will eventually carry tourist to and from the airport and Waikiki and/or Kapolei. The current route excludes the airport but plans are for an airport spur or shuttle from a substation. That really is upsetting because we are being taxed for something that will eventually compete directly with us for the tourist business. There are rules in place forbidding the "subsidized municipal transits" from competing against the private transportation companies, but only this year has the City suddenly started complying. For the handicap movements they put it out to bid but no private company could provide the service because of lack of equipment and profits; so the City takes over, supplies 10 times the vehicles and operates at a multi-million dollar loss through the quasi-C&C operator, Oahu Transit Services (OTS). OTS's president, Morton, came out publicly stating that the buses were up to capacity and the roads could not accommodate the current fleet of buses. However, it is cheaper to get new buses from the Federal Government so the City keeps expanding the fleet and services. We have gone from zero subsidy to over \$130 million annually in subsidized bus services. Why can't the Fed's give the private bus companies similar subsidies since we carry the general public too? I would love to get new buses every so many years, pay

myself and our employees premium dollars and and not worry about operating in the deficit. This is what our City government and the Feds are doing.

For starters, how about excluding the private transportation companies from all the taxes and fees that burden of industry such as vehicle weight taxes, vehicle bus stop fees, fuel taxes and worst of all mass transit subsidy tax?.

Thank you for your consideration. We look forward to any assistance and dissemination of information you may be able to provide to decision makers in the nation's capital.

Respectfully yours,

Lawson S. Teshima
PHT, Inc. Secretary-Treasurer
650 Iwilei Road, Suite 415
Honolulu, HI 96817
Phone (808) 524-5040
Email: lawson@kobay.com

RECORD # 216 DETAILS

Status : Initial Action Needed
Creation Date : 12/24/2008
Creator Affiliation :
First Name : JOHN
Last Name : HACKNEY
Business/Organization : NONE
Address : 721 PAOPUA LOOP
Alternative Preference :
Apt./Suite No. :
City : KAILUA
State : HI
Zip Code : 96734
Email : JHACKNEY@CARLSONSATOTRAVEL.COM
Telephone : 808-261-9828
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/24/2008
Submission Content/Notes : THIS WHOLE RAIL THING IS A HUGE BOONDOOGLE. IT WILL DO NOTHING TO EASE TRAFFIC. PLUS, THE WORST PART OF THE WHOLE THING IS THAT THE PROJECT IS UNAFFORDABLE. THE PEOPLE THAT MIGHT RIDE THE PROJECT ARE NOT THE ONES WHO WILL END OF PAYING FOR IT. BOTH YOU AND I KNOW THAT PROPERTY TAX PAYERS WILL END UP SHOULDERING A HUGE PERCENTAGE OF THE TOTAL COST.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 218 DETAILS

Status : Initial Action Needed
Creation Date : 12/25/2008
Creator Affiliation :
First Name : Tad
Last Name : Matsuno
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96816
Email : krankedparts@aol.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/25/2008
Submission Content/Notes : Just a comment that I think the extension to UH is a great idea. A necessary one that will help with minimizing traffic. I notice the traffic difference when UH is not in session as traffic time during morning rush hour is cut. I have been watching the traffic differences between private school sessions and UH and it appears that those commuting to UH are a big factor in traffic. I also think students would opt more to commuting via the rail system than other traffic groups. Thanks.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 219 DETAILS

Status : Initial Action Needed
Creation Date : 12/25/2008
Creator Affiliation :
First Name : Earl
Last Name : Yamasaki
Business/Organization :
Address : 859 Papalalo Place
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96825
Email : earlyyamasaki@hotmail.com
Telephone : 294-2096
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/25/2008
Submission Content/Notes : Instead of building a rail, we should use the funds for education, fixing, improving roads and higher capacity or more buses to make it more convenient for riders.
Why gamble and spend so much money for rail without knowing the results. What if you don't have the desired results? You are stuck with a white elephant. Get more buses on the routes and make it so convenient that people will gladly ride it. If it does not work you won't have a white elephant to deal with. Residents on Oahu are very used to convenience and they won't ride the rail if they have to run errands or drop their children off at school, etc.
We need to invest in our keiki and give them the chance to succeed. Fix our terrible roads.
Please give this some thought. Mahalo.
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 220 DETAILS

Status : Initial Action Needed
Creation Date : 12/25/2008
Creator Affiliation :
First Name : michael
Last Name : chu
Business/Organization : LP&D Hawaii
Address : 126 queen street
Alternative Preference :
Apt./Suite No. : 306
City : honolulu
State : HI
Zip Code : 96813
Email : mchu-LPD@hawaii.rr.com
Telephone : 537-4674
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/25/2008
Submission Content/Notes : As a partially federally funded project, is there a mandatory small business set aside (i.e. SBA 8(a), veteran owned, HUB Zone, DBE, etc.) provision for the design and construction of this project?

If so, I request the set aside be for 8(a) service disable veteran owned businesses.

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 221 DETAILS

Status : Initial Action Needed
Creation Date : 12/25/2008
Creator Affiliation :
First Name : Renate
Last Name : Alarcon
Business/Organization :
Address : 3020 ala napuaa
Alternative Preference :
Apt./Suite No. : 401
City : Honolulu
State : HI
Zip Code : 96818
Email : alarcon@hawaiiintel.net
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/25/2008

Submission Content/Notes : I voted no on the Primary Election for a rail system. Because of the money spend on the the type of system and the route. The beauty of the Island is also at stake. Yes we do have a traffic problem on the Island but the rail system the "Mayor" wants so bad it not what this island needs and not the answer. Viaduct like on the airport/nimitz is more close in certain areas, to solve the traffic problem. The people here on the island won't give up their cars, therefore, building such a high concrete blocks on the island will be worthless it will not help the traffic problem. I recently went to Los Angeles and I viewed their rail route in China town, the rail is on concrete blocks and looks awful going by a residential apartment area. "I do not want" such an awful looking piece of concrete going by my apartment building, if build it will go right by bedroom in Salt Lake. From what I heard on the Public Hearing on December 9, in Salt Lake there would be stations at the Stadium and Salt Lake Shopping Center. That is a joke, where are going all those people from Salt Lake park their cars there is not enough spaces for all the people with their cars in Salt Lake it is a dense populate residential area. The ones who do not have cars, do you think they will walk all the way down to the rail station, no they are not, they will take the closest bus available and not the rail. This is a hasty way of doing business, as previously said the island has a traffic problem, however, the present wanted system by the Mayor is not "it". The federal government will give money for any project *they would have the last time" now and thereafter. Please come up with friendlier riding system for the public, so the public will be able to use it and it will not destroy the beauty of this island. People where able to vote on the rail project, even though they are never able to use and affected by this rail system.

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 222 DETAILS

Status : Initial Action Needed
Creation Date : 12/26/2008
Creator Affiliation :
First Name : Chuyang
Last Name : Baideme
Business/Organization :
Address : 955 Ala Liliroi Street
Alternative Preference :
Apt./Suite No. : 804
City : Honolulu
State : HI
Zip Code : 96818
Email : chuyang@hawaii.edu
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/26/2008

Submission Content/Notes : Here are my suggestions

1. We should start building the rail from East Kapolei instead of from town because the purpose of the rail is to reduce the traffic congestion on the island. If more people take the rail to town, that will not only reduce the traffic congestion from the more and more densely populated Kapolei, Waipahu and Eva areas, it will also relief the traffic jam in town. But if we start building it in town, people still have to drive to town to work. That doesn't really solve the traffic problem at all. We don't have to follow suit of other cities, we need to look at where the problems are on this island.

2. The rail should go through Salt Lake instead of the airport. The purpose of the rail is to serve the residents on the island, not tourists. Salk Lake area has a lot of female workers who don't drive, they rely on the bus to commute to work. If the rail goes through Salt Lake, the ridership will probably be higher than in any other areas.

Who will use the rail more? Or how can the rail be used more efficiently? The tourists who come for a visit and travel from the airport to downtown or the residents in Salt Lake who commute everyday to work?

Beside that, if the rail goes through the airport and the tourists take the rail to downtown or Waikiki, how many taxi drivers, travel agencies and car-rental companies will loose their jobs?

In a word, the rail will mostly be paid by the tax payers living on this island; serving the residents should be the priority and the primary purpose of building the rail, not the tourists, who come for visit maybe once in a year or maybe once in a life time.

Reply Requested :

Yes

Submission Type :

Draft EIS Comment

FOIA (Freedom of Information Request) Request :

FOIA Referral Date :

FOIA Response Date :

RECORD # 223 DETAILS

Status : Initial Action Needed
Creation Date : 12/26/2008
Creator Affiliation :
First Name : Corey
Last Name : Shibata
Business/Organization : citizen of Honolulu
Address : 1304 Naulu Place
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96818
Email : bata-777@hotmail.com
Telephone : 422-1981
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/26/2008

Submission Content/Notes : I submit the following comments:

The Salt Lake route should be used because:

1. It will get more working citizens off the road since it will run through a high density population,
2. The airport track can be added later. Residents will not use the transit to the airport since they have so much to carry.
3. Tourists from the airport won't even use the transit until the Waikiki track is constructed.
4. Rush hour traffic M-F are mostly single person vehicles. Tour buses and taxis are insignificant.
5. Rush hour traffic on Sat are mostly residents. Tour buses and taxis are insignificant.

The route should run East from Kapolei to Fort Weaver Rd and up to Farrington Hwy because:

1. Again the route would run through a high populated area.
2. With the transit running past LCC, HCC, and UH Manoa there is no need to build a West Oahu College. If West Oahu College is built, then they can provide their own shuttles like UH.

More Stops from Ewa to Kalihi Should be Built because:

1. It will promote more ridership (closer walking/biking distance to stations).
2. There are a lot of businesses in Waipahu, Pearl City, and Mapunapuna where citizens will go to work.

Construction Schedule need to be fast tracked (build outwards from stations) because:

1. If cost is an issue, then it should be built asap.
2. Ridership won't be significant until the downtown tracks are completed.
3. The economy needs help now. Not 10 years from now.

Reply Requested :

Yes

Submission Type :

Draft EIS Comment

FOIA (Freedom of Information Request) Request :

FOIA Referral Date :

FOIA Response Date :

RECORD # 224 DETAILS

Status : Initial Action Needed
Creation Date : 12/27/2008
Creator Affiliation :
First Name : Michael
Last Name : Dahilig
Business/Organization :
Address : 95-1081 Milia Street
Alternative Preference :
Apt./Suite No. :
City : Mililani
State : HI
Zip Code : 96789
Email : dahilig@gmail.com
Telephone : 808-721-1585
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 12/27/2008
Submission Content/Notes : I believe the Draft EIS document has included all required disclosures pursuant to the National Environmental Protection Act.

Also, I am in support of this project, as I believe it will have a long-term positive impact on our environment.

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 225 DETAILS

Status : Initial Action Needed
Creation Date : 12/27/2008
Creator Affiliation :
First Name : Christopher
Last Name : Mapa
Business/Organization :
Address : 91173 Fort Weaver Road
Alternative Preference :
Apt./Suite No. :
City : Ewa Beach
State : HI
Zip Code : 96706
Email : mapa.christopher@gmail.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/27/2008
Submission Content/Notes : I understand the concept of rail very well, I have lived in San Francisco for about two years then returned home in Ewa Beach, and have taken many commuter rails such as CALtrain/Muni Metro/ VTA and BART. I prefer BART because of its speed, as well as length of trains and its similarities to what Hawaii is planning. We (the people of Hawaii) need to start thinking of a designated length of train (how many cars long) and our own design. Ever television ad that I have seen so far, only depicts a train that is two cars long, and in turn can give the public second thoughts. "If the train will only be that long, whats the point in even taking it, if I have to wait in a crowded station anyway?" BART trains, in my experience have ranged anywhere from 4-10 cars long, allowing for more passengers to travel at once.

We need to start thinking of our own design(s) as well as educating the general public that the planned rail project doesn't just have to be whats depicted on TV, but what is depicted is just an idea borrowed from other rail systems.

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :

RECORD # 226 DETAILS

Status : Initial Action Needed
Creation Date : 12/27/2008
Creator Affiliation :
First Name : Sheree-Victoria
Last Name : laea
Business/Organization :
Address : 2625 Namauu Drive
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96817
Email : sheree_jaea@yahoo.com
Telephone : 8083303834
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/27/2008

Submission Content/Notes : Aloha to whom ever this may concern,
I really think that this transit system isnt great for Hawaii, espescially at times like this. Last night was one of Hawaii's biggest black out since the earth quake and we wouldnt have problems if we had back power plants to the ones we already have. If one goes down we have another. Look we have comments in the advertiser from people in Okinawa and they have yet to have a blackout like the one in Oahu. That tells you something, use our tax paying money to something we need not to something we want. Im one of the people that voted for the transit not to be build, but seriously if the government gets there heads out of their asses an really look over everything they could see what exactly were going through. thanks for your time for reading my response.

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 227 DETAILS

Status : Initial Action Needed
Creation Date : 12/27/2008
Creator Affiliation :
First Name : Bill
Last Name : Russell
Business/Organization : Retired, U.S. Secret Service, Wash., D.C.
Address : 94-309 Puuwepa Placem
Alternative Preference :
Apt./Suite No. :
City : Mililani
State : HI
Zip Code : 96789
Email : foxiejrt1@aol.com
Telephone : 625-5358
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/27/2008

Submission Content/Notes : I don't think the rail system will be widely used, because it will take us too long to get to get where we want to go, and because of the problems with graffiti and vehicle break-ins at the stations.

Time:

If we have to take a bus to get to a station, then take another bus when we get off the train, and the train will make 19 or 21 stops in 20 miles, all that will consume too much time.

Break-ins at the stations:

Oahu is famous for vehicle break-ins and graffiti. Costly security measures will be needed at each of the 19 or 21 stations and on each train.

The total cost for building and maintaining and providing for security for rail is way too much for the benefits gained.

I watched the debates.

Prof. Prevadouros was right. There are other mass transit systems which are better, less costly, and will get us where we want to go faster, than rail.

Mahalo

Yes

Reply Requested :

Submission Type :

Draft EIS Comment

FOIA (Freedom of Information Request) Request :

FOIA Referral Date :

FOIA Response Date :

RECORD # 228 DETAILS

Status : Initial Action Needed
Creation Date : 12/27/2008
Creator Affiliation :
First Name : James
Last Name : Ha
Business/Organization :
Address : 1201 Liliha Street
Alternative Preference :
Apt./Suite No. : 202
City : Honolulu
State : HI
Zip Code : 96817
Email : hajames12@yahoo.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/27/2008
Submission Content/Notes : I live on Liliha Street, please make a stop near Liliha Street, thank you.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 229 DETAILS

Status : Initial Action Needed
Creation Date : 12/28/2008
Creator Affiliation :
First Name : Bonnie
Last Name : Chan
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96701
Email : b_chan@hawaiiintel.net
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 12/28/2008
Submission Content/Notes : I am concerned about the noise pollution that will be ongoing from 4 a.m. until midnight. Doesn't the city have noise regulations? I am a professional music therapist (I work for the state), & I am especially aware of the stressful effects of excessive and disruptive sound & noise on human physiology and behavior.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 231 DETAILS

Status : Initial Action Needed
Creation Date : 12/28/2008
Creator Affiliation :
First Name : Steven
Last Name : Lum
Business/Organization :
Address : 731 Amana Street
Alternative Preference :
Apt./Suite No. : 1203
City : Honolulu
State : HI
Zip Code : 96814
Email : kokohead7k@hawaiiantel.net
Telephone :
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 12/28/2008
Submission Content/Notes : Oahu experienced another total electrical blackout on 12-26-08, the second in as many years. What backup do you have for the rail which depends on electricity? Will the rail work at all during a blackout?
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 232 DETAILS

Status : Initial Action Needed
Creation Date : 12/29/2008
Creator Affiliation :
First Name : Jonathon
Last Name : Custer
Business/Organization :
Address : 5747 Dorothy Drive
Alternative Preference :
Apt./Suite No. :
City : San Diego
State : CA
Zip Code : 92115
Email : jcuster@cts.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/29/2008
Submission Content/Notes : Airport route will provide cost savings to locals and tourists alike. This will MAKE money for the state if TOURISM is more accessible.

San Diego does not provide airport route...bad for visitors and locals. ONLY THE TAXI COMPANIES PROFIT!! Look at your priorities.

Cities like San Francisco, Chicago, London, Paris, Stockholm, etc...have TOURISM and local convenience as their top priority!!

Mahalo...Jonathon Custer
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 233 DETAILS

Status : Initial Action Needed
Creation Date : 12/29/2008
Creator Affiliation :
First Name : Ben
Last Name : Ramelb
Business/Organization : Retired Civil Engineer
Address : 1148 Ala Liliko'i St
Alternative Preference :
Apt./Suite No. :
City : HON
State : HI
Zip Code : 96818
Email : ramelbb001@hawaii.rr.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/29/2008

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project",

Issue : The DEIS lacks the Managed Lane Alternative (MLA) as stated in the Notice of Intent (NOI) dated 7 Dec 2007 (reference (a), which states: "The Federal Transit Administration (FTA) and the City and County of Honolulu, Department of Transportation Services (DTS) intend to prepare an EIS (and Alternative Analysis (AA)) on a proposal by the City and County of Honolulu to implement transit improvements that potentially include high-capacity transit service in a 25-mile travel corridor between Kapolei and the University of Hawaii at Manoa and Waikiki. Alternatives proposed to be considered in the AA and draft EIS include No Build, Transportation System Management, Managed Lanes, and Fixed Guideway Transit. Other transit alternatives may be identified during the scoping process."

Discussion:

The process used by the City & County of Honolulu (City) for assessing the Managed Lane Alternative (MLA) in the City's Alternatives Analysis (AA) was flawed.

a) A similar length Managed Lane, reversible three-lane transit way was built for \$320 million in Tampa in year 2005, while the City AA estimated the similar MLA to cost \$2.6 Billion.

b) Professor Panos Prevedourous published a study for Managed Lanes (reversible) in March 2008, "Transportation Alternatives Analysis for Mitigating Traffic Congestion between Leeward Oahu and Honolulu" which shows the 11 mile three-lane cost estimate to be \$900 million which is in line with the \$320 million Tampa three-lane reversible transit way. The professor believes the Plan's costs are accurate based on cost estimate spreadsheet analysis received from a local heavy construction estimation expert is \$818,634,000 in 2008 dollars. Again, this estimate is more in line with the Tampa three lane reversible Transit way estimate and refutes the AA estimate of \$2.6 Billion. The AA estimate disqualified the Managed Lane Alternative to be inferior to the Rail Alternative which cost \$3.7 Billion.

c) 2008 Mayoral Candidate Ann Kobayashi, using the Professor's Managed Lane study and the former Mayor Harris Administration BRT Study, proposed a similar Managed Lane 15-mile fixed guideway which is estimated at \$1.2 Billion. The estimate is similar to the 11 mile Managed Lane and which should have been used in the AA rather than \$2.6 Billion.

d) Parsons Brinkerhoff (PB) and the City proposed that automobiles with two or more occupants should be allowed toll free on the MLA. This made the current contraflow zipper lane untenable and thus provided the rationale for removing it. The net result was that the additional two lane advantage that the MLA offered to the Corridor was reduced to one lane. They failed to publish their assessment of the option of having all autos pay a toll, which would have resulted in the zipper lane and the two-lane advantage being retained. And they failed to analyze MLA options with higher occupancy thresholds, such as three through five occupants.

e) PB and the City added unnecessary costs to the project by proposing a 16-mile facility while not testing the viability of shorter 10 to 12-mile versions.

f) PB and the City inflated MLA operating costs to make the project appear uncompetitive with the Fixed Guideway Alternative. Just two examples are a) the projection of a totally unnecessary 5,400 parking stalls for the MLA, and b) saddling the MLA with inflated bus operating costs.

g) PB and the City engineered the ingress and egress ramps in a way that could only result in heavy traffic congestion at these points. In fact, the MLA has exit/off ramps along its route for access to job centers other than downtown Honolulu.

h) PB and the City grossly inflated the capital costs of the MLA with the result that, if correct, it would be twice the cost per lane mile of any highway ever built in the U.S.

In his letter to the City and copied to FTA, Dr. Panos Prevedouros, Professor of Traffic Engineering at the University of Hawaii, Chair of the Transportation Research Board's Highway Micro-simulations Committee and a member of the Task Force, commented, "the most egregious violation of FTA's rules on alternative specification and analysis was the deliberate underengineering of the Managed Lanes Alternative to a degree that brings ridicule to prevailing planning and engineering principles."

i) The 11 mile, elevated reversible MLA, with three lanes as proposed by Professor Prevedouros, has the commuter capacity to eliminate the two H-1 bottlenecks at Pearl City and at Middle Street merge. The Rail, according to the AA, table 3-12, will result in 17,500 vehicles per hour on H-1 (H-1 full capacity = 9,500 vph) because the Rail cannot accommodate the full commuter demand in year 2030.

Conclusion: The City's AA wrongly estimated the cost of the Managed Lane Alternative and the MLA capacity to eliminate the H-1 bottlenecks on H-1.

Recommendation: It is requested that the Managed Lane Alternative as proposed by Ann Kobayashi's EzWay proposal or the Professor Prevedouros Managed Lane Study be reinstated into the Honolulu's Transit Corridor Draft Environmental Impact Statement

Reference (a):
[Federal Register: December 7, 2005 (Volume 70, Number 234)]
[Notices]
[Page 72871-72873] From the Federal Register Online via GPO Access
[wais.access.gpo.gov] [DOCID:fr07de05-137]

Respectfully,

Ben Ramelb P.E.
1148 Ala Liliko'i St.
Honolulu HI 96818

Copy to:
1) Mr. Ted Matley
FTA Region IX
201 Mission St. Suite 1650
San Francisco, CA 94105
FAX 415-744-2726

2) Governor Linda Lingle
Hawaii State Capitol
415 S Beretania St. 5th Floor
Honolulu, HI 96813
FAX (808) 586-0006

3) Honolulu City Council Members
FAX (808) 867-5011

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Yes
Draft EIS Comment

RECORD # 234 DETAILS

Status : Initial Action Needed
Creation Date : 12/29/2008
Creator Affiliation :
First Name : Ben
Last Name : Ramelb
Business/Organization : Retired Civil Engineer
Address : 1148 Ala Liliko'i St
Alternative Preference :
Apt./Suite No. :
City : HON
State : HI
Zip Code : 96818
Email : ramelbb001@hawaii.rr.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/29/2008

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue : The DEIS and
alternative Analysis do not investigate a wide range of alternatives as
required by law.

Discussion: The Alternative Analysis and DEIS failed to provide "... an
assessment of a wide range of public transportation alternatives ..."
and/or "... sufficient information to enable the Secretary to make the
findings of project justification ..." as required by statute.

In addition, we believe that you will find that the City, PB and FTA failed
to, "Rigorously explore and objectively evaluate all reasonable
alternatives," and "Devote substantial treatment to each alternative
considered in detail including the proposed action so that reviewers may
evaluate their comparative merits," as required by the Council on
Environmental Quality (CEQ) Sec. 1502.14.

Four alternatives should be assessed:

- 1) BRT transit system as proposed by the Harris Administration. The
BRT route downtown should be limited to King and Beretania Streets (a
couplet) and exclude Dillingham Blvd and Kapiolani Blvd which do not
have sufficient lanes to accommodate BRT.
- 2) Managed Lane (reversible three lanes) as proposed by Professor
Panos Prevedouros Study, "Transportation Alternatives Analysis for
Mitigating Traffic Congestion between Leeward Oahu and Honolulu"
which shows the 11 mile three-lane cost estimate to be \$900 million
which is in line with the \$320 million Tampa three-lane reversible transit
way. The full report is available at
www.eng.hawaii.edu/~panos/UHCS.pdf.
- 3) Former mayoral candidate Ann Kobayashi's proposal for a 15 mile
EzWay. See
<http://www.honoluluadvertiser.com/article/20081015/NEWS01/810150392/1001>
- 4) Build two elevated highway bypasses around the H-1 bottlenecks at H-
1/H-2 merge and at Middle St. merge. The bypasses include: (a)
"Kamehameha HOV Flyover", a four-mile, three-lane reversible elevated
hwy over the Kamehameha Hwy median between the H-1/H-2 merge
and the H-1 Viaduct east of Aloha Stadium and (b) "Nimitz Flyover", a
three-mile, three-lane reversible elevated hwy over the Nimitz Hwy
median between the H-1 Viaduct at Keehi Lagoon Drive and Hotel
St/Alakea St./ Halekauwila St/Ala Moana Blvd. An on/off ramp to
Waikamilo Rd from the Nimitz bypass would reduce the number of lanes

from three to two between Waikamilo Rd and Iwilei. See attachment for more information on HOV Flyovers.

Recommendation: Include the above four alternatives in the DEIS.

Respectfully,

Ben Ramelb P.E.
1148 Ala Liliko'i St.
Honolulu HI 96818

Copy to:

1) Mr. Ted Matley
FTA Region IX
201 Mission St. Suite 1650
San Francisco, CA 94105
FAX 415-744-2726

2) Governor Linda Lingle
Hawaii State Capitol
415 S Beretania St. 5th Floor
Honolulu, HI 96813
FAX (808) 586-0006

3) Honolulu City Council Members
FAX (808) 867-5011

Attachment – Description of Nimitz and Kamehameha HOV Flyovers
Nimitz Flyover, Reversible HOV:

The Nimitz HOV Flyover is a 3-mile reversible, elevated, three-lane structure over the Nimitz Highway median from the Airport Viaduct at Keehi Lagoon to Hotel Street and Alakea St/Halekiau St. The Flyover would be built similar to the Tampa Elevated three-lane Reversible HOV as described in-
<http://www.tollroadsnews.com/node/172> .

One of the three lanes would exit the Flyover at Waikamilo Rd. to provide access to job centers in Kalihi, resulting in the Flyover having only two lanes entering downtown. The downtown terminal connections from the Nimitz HOV Flyover include an elevated busway from Iwilei to Hotel Street and a single lane underpass to both Alakea St/Halekiau Streets. These connections are described in a Managed Lane Study "Transportation Alternatives Analysis for Mitigating Traffic congestion between Leeward Oahu and Honolulu". The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.

The initial 2005 cost for the 10 mile Tampa Reversible was \$320 million or \$32 Million per highway mile, however, a geotechnical design error increased the cost to \$420 million or \$42 million per mile. Using a geographic and escalation factor of 100 percent, the 3-mile Nimitz HOV

Flyover at \$60 to \$80 million per mile would cost \$180 million to \$240 million.

The "Nimitz Flyover" has an approved Final Environmental Impact Statement which allows for early construction.

Kamehameha Flyover, Reversible HOV:

The Kamehameha HOV Flyover is a 3-mile reversible, elevated, three-lane structure over the median of Kamehameha Highway from the H-1/H-2 merge at the Waiawa Interchange to the Airport Viaduct just diamond head of the Aloha Stadium. The Flyover would be built similar to the Tampa Elevated three-lane Reversible HOV as described in-
<http://www.tollroadsnews.com/node/172> .

The Kamehameha Flyover would be connected to H-1, H-2, Kamehameha Highway and Farrington Highway at the west end and to the Airport Viaduct at the east end. These connections are described in a Managed Lane Study "Transportation Alternatives Analysis for Mitigating Traffic congestion between Leeward Oahu and Honolulu". The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.

The initial 2005 cost for the 10 mile Tampa Reversible was \$320 million or \$32 Million per highway mile, however, a geotechnical design error increased the cost to \$420 million or \$42 million per mile. Using a geographic and escalation factor of 100 percent, the 4-mile Kamehameha HOV Flyover at \$60 to \$80 million per mile would cost between \$240 million to \$320 million.

The Draft Environmental Impact Statement (DEIS) - Honolulu High-Capacity Transit Corridor Project Nov 2008 , shows the rail route over Kamehameha Highway between Pearl City and Aloha Stadium which could conflict with the proposed three-lane "Kamehameha Flyover" route outlined above. If the rail is built, it is suggested that both the Kamehameha Highway "Flyover" and the Rail be built within the elevated Kamehameha Highway corridor. In this case, only a two-lane "Kamehameha Flyover" is needed (instead of three-lanes) to be built alongside and parallel to the Rail transit. The rail with a capacity of 6,000 commuters per hour and the two-lane "Kamehameha Flyover", with a capacity of 4,000 vehicles per hour, should be adequate to substantially reduce the bottleneck at the H-1/H-2 merge and the traffic congestion on H-1 between Pearl City and Aloha Stadium.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Yes
Draft EIS Comment

RECORD # 235 DETAILS

Status : Initial Action Needed
Creation Date : 12/29/2008
Creator Affiliation :
First Name : Ben
Last Name : Ramelb
Business/Organization : Retired Civil Engineer
Address : 1148 Ala Liliko'i St
Alternative Preference :
Apt./Suite No. :
City : HON
State : HI
Zip Code : 96818
Email : ramelbb001@hawaii.rr.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/29/2008

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project: Issue - Scope of Work
reduced in DEIS from scope stipulated in 2006 Notice of Intent

Fact:
The project scope outlined in the 2006 Notice of Intent (NOI) agreement between the Federal Transit Administration and the City and County of Honolulu is violated. The NOI explicitly mentions a fixed guideway from Kapolei to the UH. The DEIS fixed guide way starts well outside Kapolei and ends at Ala Moana Shopping Center. The 34 miles have become 20 miles in the DEIS.

Discussion:

The DEIS reduces the project scope as stated in the Notice of Intent (NOI) dated 7 Dec 2007 reference (a), which states:
"The Federal Transit Administration (FTA) and the City and County of Honolulu, Department of Transportation Services (DTS) intend to prepare an EIS (and Alternative Analysis (AA)) on a proposal by the City and County of Honolulu to implement transit improvements that potentially include high-capacity transit service in a 25-mile travel corridor between Kapolei and the University of Hawaii at Manoa and Waikiki."

Discussion:

The City's 2006 Alternatives Analysis states that "The primary project study area is the travel corridor between Kapolei and the University of Hawai'i at Manoa.

The DEIS covers a fixed guideway route of 20 miles from Kapolei to Ala Moana Center. The Draft Environmental Impact of the fixed guideway is limited to only the 20 miles rather than the full 34 miles from Kalaeloa to Waikiki and UN Manoa.

Conclusion:

The project scope outlined in the 2006 Notice of Intent (NOI) agreement between the Federal Transit Administration and the City and County of Honolulu is violated.

Recommendation:

It is strongly recommended that the project scope contained in the DEIS be expanded to include a rail route to both Waikiki and to UH Manoa.

Respectfully,

Ben Ramelb P.E.
1148 Ala Lilikoi St
Honolulu, HI
96818

Reference (a):
[Federal Register: December 7, 2005 (Volume 70, Number 234)]
[Notices]
[Page 72871-72873] From the Federal Register Online via GPO Access
[wais.access.gpo.gov] [DOCID:fr07de05-137]

Copy to:
1) Mr. Ted Matley
FTA Region IX
201 Mission St. Suite 1650
San Francisco, CA 94105
FAX 415-744-2726

Governor Linda Lingle
Hawaii State Capitol
415 S Beretania St. 5th Floor
Honolulu, HI 96813
FAX (808) 586-0006

3)Honolulu City Council Members
FAX (808) 867-5011

Reply Requested :
Submission Type :
**FOIA (Freedom of
Information Request)
Request :**
FOIA Referral Date :
FOIA Response Date :

Yes
Draft EIS Comment

RECORD # 236 DETAILS

Status : Initial Action Needed
Creation Date : 12/29/2008
Creator Affiliation :
First Name : Ben
Last Name : Ramelb
Business/Organization : Retired Civil Engineer
Address : 1148 Ala Liliko'i St
Alternative Preference :
Apt./Suite No. :
City : HON
State : HI
Zip Code : 96818
Email : ramelbb001@hawaii.rr.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/29/2008

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue : The DEIS
incorrectly excludes Managed Lanes and other alternatives

Discussion: DEIS Chapter 2 summarizes alternatives considered for the
Honolulu High-Capacity Transit Corridor Project. The alternatives
considered were chosen primarily by the Alternative Analysis published
in 2006.

The AA was flawed because it failed to include several transit
alternatives, each with the capability to substantially reduce or eliminate
the traffic congestion on H-1 at Pearl City and Middle St. merge in year
2030. As shown on Table 3-12 of the AA and DEIS Table 3-12, All rail
alternatives result in worse traffic congestion on H-1 AFTER any rail
alternative is built and operating.

The fact that rail will worsen congestion on H-1 after spending a
minimum of \$6.2 Billion for the Rail alternative, it is totally unacceptable
to the Oahu taxpayer to continue to face worse traffic congestion on H-1
which is the single, primary reason for building a "mass transit system".

As a minimum, the DEIS should include the following additional
alternatives:

Four alternatives should be assessed:

- 1) BRT transit system as proposed by the Harris Administration. The
BRT route downtown should be limited to King and Beretania Streets
and exclude Dillingham Blvd and Kapiolani Blvd.
- 2) Managed Lane (reversible) as proposed by Professor Panos
Prevedouros Study, "Transportation Alternatives Analysis for Mitigating
Traffic Congestion between Leeward Oahu and Honolulu" which
shows the 11 mile three-lane cost estimate to be \$900 million which is in
line with the \$320 million Tampa three-lane reversible transitway.
- 3) Former mayoral candidate Ann Kobayashi's proposal for a 15 mile
EzWay. See
<http://www.honoluluadvertiser.com/article/20081015/NEWS01/810150392/1001>
- 4) Build two elevated highway bypasses around the H-1 bottlenecks at H-
1/H-2 merge and at Middle St. merge. The bypasses include: a) a 4
mile, three-lane reversible elevated highway (Kamehameha Flyover)
over the Kamehameha Hwy median between the H-1/H-2 merge and the
H-1 Viaduct at Aloha Stadium and b) a 3 mile, three-lane reversible

elevated hwy (Nimitz Flyover) over the Nimitz Hwy median between the H-1 Viaduct at Keehi Lagoon Drive and Hotel St/Alakea St./ Halekauwila St/Ala Moana Blvd. An on/off ramp to Waikamilo Rd from the Nimitz bypass would reduce the number of lanes from three to two between Waikamilo Rd and Iwilei. See attachment for more information on HOV flyovers.

Conclusion: The above four transit alternatives meet the goals and objectives of the Honolulu General Plan and Oahu Regional Transportation Plan and therefore should be included for consideration for Oahu Mass Transit system in the West Oahu corridor.

Recommendation: Include the above four alternatives in the DEIS.

Respectfully,

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Attachment – Description of Nimitz and Kamehameha HOV Flyovers
Nimitz Flyover, Reversible HOV:

The Nimitz HOV Flyover is a 3-mile reversible, elevated, three-lane structure over the Nimitz Highway median from the Airport Viaduct at Keehi Lagoon to Hotel Street and Alakea St/Halekauwila St. The Flyover would be built similar to the Tampa Elevated three-lane Reversible HOV as described in-

<http://www.tollroadsnews.com/node/172> .

One of the three lanes would exit the Flyover at Waikamilo Rd. to provide access to job centers in Kalihi, resulting in the Flyover having only two lanes entering downtown. The downtown terminal connections from the Nimitz HOV Flyover include an elevated busway from Iwilei to Hotel Street and a single lane underpass to both Alakea St/Halekauwila Streets. These connections are described in a Managed Lane Study

"Transportation Alternatives Analysis for Mitigating Traffic congestion between Leeward Oahu and Honolulu". The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.

The initial 2005 cost for the 10 mile Tampa Reversible was \$320 million or \$32 Million per highway mile, however, a geotechnical design error increased the cost to \$420 million or \$42 million per mile. Using a geographic and escalation factor of 100 percent, the 3-mile Nimitz HOV Flyover at \$60 to \$80 million per mile would cost \$180 million to \$240 million.

The "Nimitz Flyover" has an approved Final Environmental Impact Statement which allows for early construction.

Kamehameha Flyover, Reversible HOV:

The Kamehameha HOV Flyover is a 3-mile reversible, elevated, three-lane structure over the median of Kamehameha Highway from the H-1/H-2 merge at the Waiawa Interchange to the Airport Viaduct just diamond head of the Aloha Stadium. The Flyover would be built similar to the Tampa Elevated three-lane Reversible HOV as described in <http://www.tollroadsnews.com/node/172>.

The Kamehameha Flyover would be connected to H-1, H-2, Kamehameha Highway and Farrington Highway at the west end and to the Airport Viaduct at the east end. These connections are described in a Managed Lane Study "Transportation Alternatives Analysis for Mitigating Traffic congestion between Leeward Oahu and Honolulu". The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.

The initial 2005 cost for the 10 mile Tampa Reversible was \$320 million or \$32 Million per highway mile, however, a geotechnical design error increased the cost to \$420 million or \$42 million per mile. Using a geographic and escalation factor of 100 percent, the 4-mile Kamehameha HOV Flyover at \$60 to \$80 million per mile would cost between \$240 million to \$320 million.

The Draft Environmental Impact Statement (DEIS) - Honolulu High-Capacity Transit Corridor Project Nov 2008, shows the rail route over Kamehameha Highway between Pearl City and Aloha Stadium which could conflict with the proposed three-lane "Kamehameha Flyover" route outlined above. If the rail is built, it is suggested that both the Kamehameha Highway "Flyover" and the Rail be built within the elevated Kamehameha Highway corridor. In this case, only a two-lane "Kamehameha Flyover" is needed (instead of three-lanes) to be built alongside and parallel to the Rail transit. The rail with a capacity of 6,000 commuters per hour and the two-lane "Kamehameha Flyover", with a capacity of 4,000 vehicles per hour, should be adequate to substantially reduce the bottleneck at the H-1/H-2 merge and the traffic congestion on H-1 between Pearl City and Aloha Stadium.

Reply Requested :
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Yes
Draft EIS Comment

RECORD # 237 DETAILS

Status : Initial Action Needed
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Submission Date : 12/29/2008

Submission Content/Notes : 29 December, 2008

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Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue : The DEIS
unjustly excludes Managed Lanes and other alternatives

Discussion:

DEIS Chapter 2 evaluates only "No build and Steel Wheel Rail Transit" alternatives identified by the 2006 City Alternative Analysis. The AA intentionally assigned flawed information to the Managed Lanes Alternative (MLA) to eliminate the MLA from further consideration for Oahu's Mass Transit system. The flawed information is further displayed in Honolulutransit.com which makes a comparison of Mass Transit Options including the MLA (aka HOT) and is shown below. Honolulutransit.com provides a chart to compare the Mass Transit options and concludes that Steel Wheel Rail Transit is the best option. The Mass Transit Options included:

- 1) Steel Wheel Rail Transit (SWRT)
- 2) Rubber Tire Fixed Guideway (RTFG)
- 3) Elevated "HOT" Toll roads or Managed Lanes (HOT)

Comparison of Options (see chart in www.honolulutransit.com/FAQ

under "Why was steel wheel Technology chosen for Honolulu?")

- A) Lowest construction cost: SWRT – YES ; RTFG – NO ; HOT - NO.
- B) Lowest Cost to maintain and operate: SWRT – YES ; RTFG – NO ; HOT - NO.
- C) Qualifies for federal transit funding: SWRT – YES ; RTFG – YES ; HOT - NO.
- D) Highest Passenger Capacity: SWRT – YES ; RTFG – YES ; HOT - NO.
- E) Electric-powered, can run on wind, solar, H-power: SWRT – YES ; RTFG – YES ; HOT - NO.
- F) Lightest construction impact on community: SWRT – YES ; RTFG – YES ; HOT - NO.
- G) Greatest relief of traffic congestion: SWRT – YES ; RTFG – YES ; HOT - NO.
- H) Lowest operating noise levels: SWRT – YES ; RTFG – NO ; HOT - NO.
- I) Most proven transit solution: SWRT – YES ; RTFG – NO ; HOT - NO.

There are comparison flaws between HOT and SWRT or RTFG in each of the above topics. However, the major flawed comparisons are found in comparisons "A", "D", and "G" as explained below.

Discussion of Comparison A) - (Rail has) Lowest construction Cost:

The capital cost estimate for the 30 mile SWRT in the Alternative Analysis (Table 5-1) is \$5.5 Billion for Kamokila to Waikiki or \$183 million per mile (rail includes 20 + four story rail stations, 180 land acquisition and power substations at each rail station). The Alternative Analysis assigns a capital cost estimate for 11 mile HOT two-lane reversible highway from Waikele to Iwilei at \$2.57 Billion or \$233 million per mile (HOT has zero bus stations and zero power substations). The AA-assigned capital cost estimate for the HOT reversible at \$233 per mile is grossly incorrect based on several factors:

- a) The Oahu Regional Transportation Plan (ORTP 2030) link http://oahumpo.org/ortp/ORTP2030/OMPO_Report_FINAL.pdf shows the State Project No. 52 - 2.2 mile Nimitz two-lane elevated flyover at \$250 million (State DOT cost Estimate) or \$113 million per mile.
- b) The 10 mile Tampa three-lane elevated expressway <http://www.tollroadsnews.com/node/172> cost \$420 million or \$42 million per mile.
- c) The AA assigned cost estimate for the HOT reversible would conclude that the HOT would cost twice as much per lane mile as H-3, the most expensive highway because it had to bore two tunnels through the Koolaus.
- d) Professor Panos Prevedouros study "Transportation Alternative Analysis for Mitigating traffic Congestion between Leeward Oahu and Honolulu" March 2008, shows a cost estimate for a three lane, 11 mile elevated Managed Lane for \$900 million or \$81 million per mile. The Managed Lane facility is similar in construction to the Tampa three lane elevated reversible. The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.

Conclusion: It is concluded that the AA-assigned capital cost estimate for the HOT reversible at \$233 per mile is grossly incorrect and that a three-lane reversible HOT or managed lane is estimated to cost not more than \$80 million per mile or \$880 million for 11 miles from the H-1/H-2 merge to downtown Hotel Street.

Discussion of Comparison D) - (Rail has) Highest Passenger Capacity: Numbers from Table 3-12 of city 2006 Nov Alternative Analysis (\$10 million report):

Rail only: The rail has a peak passenger capacity of 6,000 commuters per hour (2,000 seated, 4,000 standees) based on 300 commuters per train group at 3 minute intervals. Also see honolulutransit.com/FAQ "What is Honolulu Rail Transit?" for rail commuter capacity.

HOT or Managed Lane: The HOT will have three lanes, each lane has a capacity of 2000 vph. For three lanes, the vehicular capacity is 6000 vehicles per hour. The HOT person capacity is calculated thus:

Projected use of the HOT during peak hour includes:

200 express buses w/~50 pns = 10,000 pns

500 HOV5 (carpool) = 2,500 pns

500 vanpool (~5pns) = 2,500 pns.

Remaining excess capacity available for low occupancy vehicles:

6,000 vph minus (200 + 500 + 500) = 4,800 vph. 4,800 low occupancy vehicles

Average persons per vehicle = 1.2 pns per vehicle
4,800 vehicles with 1.2 pns = 5700 pns

Summary: HOT persons capacity = 10,000 + 2,500 + 2,500 + 5,700 = ~
20,700 pns

Conclusion: Rail carries 6,000 commuters per hour while a three-lane
HOT or Managed Lane carries about 20,000 commuters per hour.
Managed Lane Alternative carries over three times the commuter
capacity of rail.

Comparison G) - (Rail provides) Greatest relief of traffic congestion:
Numbers from Table 3-12 of city 2006 Nov Alternative Analysis (\$10
million report):

Rail only: The rail has a peak passenger capacity of 6,000 commuters
per hour (2,000 seated, 4,000 standees) based on 300 commuters per
train group at 3 minute intervals.

H-1 only: rated capacity = 9,500 vehicles per hour (equivalent 15,400
commuters per hour)

H-1 forecast yr 2030 traffic load = 17,500 vehicles per hour per City AA
Table 3-12 (or 8,000 vph overload = 9,600 commuters per hour)

Managed Lane three-Lane HOV Reversible Flyover: capacity = 6,000
high occupancy vehicles per hour (equivalent 21,600 commuters per
hour). Capacity based on HOV use on Flyover by 200 express buses
per peak hour, car pools, van pools, green cars and HOV2. (50 pns per
express bus and 5800 vph at avge 2 pns per vehicle).

Year 2030 commuter load by City AA Report = Rail (6000) + H-1
overload (9,600) + H-1 capacity (15,400) = 31,000 commuters.

2030 Load = 31,000 commuters per hour

Rail + H-1 = 21,400 commuters per hour

Managed Lane HOV + H-1 = 37,000 commuters per hour

Conclusion: Rail does not have sufficient commuter capacity which will
cause 9,600 commuters to be stuck in gridlock on H-1 or stuck at rail
stations (especially at stations between Waipahu and Kalihi). Managed
Lane HOV Alternative will eliminate congestion and bottlenecks on H-1.

Overall Conclusion and Recommendation:

It is concluded that the Managed Lane (three-Lane HOT) Alternative was
erroneously discarded for further evaluation in the Alternative Analysis
and therefore it is recommended that the Managed Lane (Three-Lane
elevated HOT) must be reinstated into the DEIS for consideration as a
viable Mass Transit Alternative.

Respectfully,

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Reply Requested :

Yes

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Information Request)
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FOIA Response Date :

RECORD # 238 DETAILS

Status : Initial Action Needed
Creation Date : 12/29/2008
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Other Submission Method :
Submission Date : 12/29/2008

Submission Content/Notes : 29 December, 2008

To:
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FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue : The DEIS
shows Summary of Alternative Analysis Findings which contains inflated
Capital cost for Managed Lane Alternative (MLA)

Fact:

DEIS Chapter 2, Table 2-1 shows a Summary of Alternative Analysis
Findings including Type of alternative and Total Capital cost for each
alternative:

Alternative Total Capital Cost

- 2030 No Build \$600 million
- 2030 Transp. Sys. Mgmt \$856 million
- 2030 Managed Lane (MLA) \$3.6 to \$4.7 Billion (two-lanes, 11 miles)
- 2020 Fixed Guideway \$4.1 to \$6.1 Billion (28 miles)

Discussion:

Table 2-1 shows total capital cost information for the Managed Lane
Alternative (MLA) of \$3.6 to \$4.7 Billion or \$327 Million to \$427 million
per mile over 11 miles.

The AA-assigned capital cost estimate for the Managed Lane Alternative
(Two-lane elevated reversible hwy) is grossly incorrect based on several
factors:

a) The Oahu Regional Transportation Plan (ORTP 2030) link
http://oahumpo.org/ortp/ORTP2030/OMPO_Report_FINAL.pdf shows
the State Project No. 52 - 2.2 mile Nimitz two-lane elevated flyover at
\$250 million (State DOT cost Estimate) or \$113 million per mile.

b) The 10 mile Tampa three-lane elevated expressway
<http://www.tollroadsnews.com/node/172> cost \$420 million or \$42 million
per mile.

c) The AA assigned cost estimate for the HOT reversible would conclude
that the HOT would cost twice as much per lane mile as H-3, the most
expensive highway because it had to bore two tunnels through the
Koolaus.

d) Professor Panos Prevedouros study "Transportation Alternative
Analysis for Mitigating traffic Congestion between Leeward Oahu and
Honolulu" March 2008, shows a cost estimate for a three-lane, 11 mile
elevated Managed Lane for \$900 million or \$81 million per mile. The
Managed Lane facility is similar in construction to the Tampa three lane
elevated reversible. The full report is available at
www.eng.hawaii.edu/~panos/UHCS.pdf.

Conclusion: It is concluded that the AA-assigned capital cost estimate for the HOT reversible at \$327 Million to \$427 million per mile is grossly incorrect and that a three-lane reversible MLA is estimated to cost not more than \$80 million per mile or \$880 million for 11 miles from the H-1/H-2 merge to downtown Hotel Street.

Recommendation:

It is recommended that the DEIS show a revised lower cost for the Managed Lane Alternative (Elevated three-Lane reversible), including Table 2-1, as depicted in www.eng.hawaii.edu/~panos/UHCS.pdf and that the MLA be reinstated into the DEIS for consideration as a viable Mass Transit Alternative.

Respectfully,

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To:
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Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue : The DEIS must
expand Mass transit alternatives for evaluation as required by law

Discussion: The Alternative Analysis and DEIS failed to provide "... an
assessment of a wide range of public transportation alternatives ..." and/or "... sufficient information to enable the Secretary to make the
findings of project justification ..." as required by statute.

Furthermore, the City, Parsons Brinkerhoff (PB) and the Federal Transit
Authority failed to "Rigorously explore and objectively evaluate all
reasonable alternatives," and "Devote substantial treatment to each
alternative considered in detail including the proposed action so that
reviewers may evaluate their comparative merits," as required by the
Council on Environmental Quality (CEQ) Sec. 1502.14.

For example, the Managed Lane Alternative (MLA) in the Alternative
Analysis (AA) established a capital cost estimate for 11 mile MLA two-
lane reversible highway from Waikale to Iwilei at \$2.57 Billion or \$233
million per mile. The 2006 AA did not consider the fact that the Tampa
three-lane, 10 mile, elevated expressway was built for \$420 million or
\$42 million per mile. See Tampa
<http://www.tollroadsnews.com/node/172> . Had the city AA PB consultant
reviewed the Tampa Reversible Expressway actual construction cost,
the AA would have assigned a Capital cost estimate for the two-lane
MLA at no more than \$80 million per mile instead of \$233 million per
mile.

There are alternatives other than fixed guideway which the AA should
have considered knowing that Mayor Mufi Hannemann have, for over
two years, insisted that the people of West Oahu wanted traffic
congestion on H-1 be solved and they wanted a solution NOW! The PB
consultants should have identified the congestion problem from West
and Central Oahu to be the two major "H-1 bottlenecks" which are at the
H-1/H-2 merge and at the Middle Street merge. The PB consultants
should then have identified transit alternatives to eliminate the two
bottlenecks. Instead, PB proceeded to support the more expensive \$6.0
+ rail transit as the most cost effective transit solution. The final PB
prepared AA indicates that the \$6.+ Billion rail transit WORSENS the
congestion at the two bottlenecks as shown on AA table 3-12 which
shows that traffic OVERLOAD on H-1 after rail is built will increase from
1,500 vehicles per hour overload to 8,000 vph overload!
PB, with their expertise, should have had the ability to know that the first

low-cost alternative to eliminate the H-1 bottlenecks is to build a three-lane, three-mile elevated reversible "Nimitz HOV Flyover" from the Airport Viaduct/Keehi Lagoon Drive to downtown Hotel Street and Alakea Street. This Nimitz flyover will easily eliminate the Middle Street bottleneck for less than \$300 million, details can be found in a 2008 study www.eng.hawaii.edu/~panos/UHCS.pdf. Furthermore, this project is identified as State Project as Number 52 in the Oahu Regional Transportation Plan (ORTP 2030) and a Final EIS was approved during the Ben Cayetano Administration.

PB could have also easily identified that a similar "Kamehameha Flyover", a 4-mile, three-lane elevated reversible HOV over Kamehameha Hwy median between the H-1/H-2 merge and the Airport Viaduct east of Aloha Stadium. This Kamehameha Flyover has the capacity to eliminate the H-1/H-2 traffic bottleneck because it would have 3 lanes of one-way HOV traffic during peak period. The capacity evaluation for the Kam flyover follows:

Numbers from Table 3-12 of city 2006 Nov Alternative Analysis (\$10 million report):

Rail only: capacity = 6000 commuters per peak hour (equivalent 5000 vehicles per peak hour.)

H-1 only: rated capacity = 9,500 vehicles per hour (equivalent 15,400 commuters per hour)

H-1 forecast yr 2030 traffic load = 17,500 vehicles per hour per City AA Table 3-12 (or 8,000 vph overload = 9,600 commuters per hour)

Managed Lane three-Lane HOV Reversible Kamehameha Flyover: capacity = 6,000 high occupancy vehicles per hour (equivalent 21,600 commuters per hour). Capacity based on HOV use on Kamehameha Flyover by 200 express buses per peak hour, car pools, van pools, green cars and HOV2. (50 pns per express bus and 5800 vph at avge 2 pns per vehicle).

Year 2030 commuter load by City AA Report = Rail (6000) + H-1 overload (9,600) + H-1 capacity (15,400) = 31,000 commuters.

2030 Load = 31,000 commuters per hour

Rail + H-1 = 21,400 commuters per hour

Managed Lane HOV + H-1 = 37,000 commuters per hour

Conclusion: Rail does not have sufficient commuter capacity which will cause 9,600 commuters to be stuck in gridlock on H-1 or stuck at rail stations (especially at stations between Waipahu and Kalihi). Managed Lane HOV Alternative will eliminate congestion and bottlenecks on H-1. The PB consultants should have been aware of the 10 mile Tampa three lane elevated, reversible expressway which was built and completed in year 2005 for \$420 million or \$42 million per mile! If the PB consultants applied a 100 percent escalation and geographic cost factor and increase the cost to \$80 million per mile for the MLA evaluated in the Alternative Analysis, the cost for the 4 mile long Kamehameha Flyover (MLA reversible three lane) and 3 mile Nimitz Flyover (MLA reversible three lane) would have cost of \$320 million and \$240 million respectively, much lower than the \$2.57 Billion assigned to the MLA alternative in the AA.

Conclusion:

The Alternative analysis is wrong in excluding the MLA for further consideration, due to capital cost issues, as a viable alternative for mass transit for the West Oahu Corridor.

Recommendation:

The DEIS must reinstate the MLA Alternative which is an 11 mile, three-lane elevated HOV transitway from the H-1/H-2 merge to Hotel Street and Alakea Street/Halekauwila Street as described in www.eng.hawaii.edu/~panos/UHCS.pdf. The Managed Lane alternative should be considered as two options: HOT Lane and as a HOV hwy limited to HOV vehicles and "green cars – hybrid or electric vehicles".

Respectfully,

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To:
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Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue The DEIS
shows the Managed Lane Alternative (MLA) was rejected by the
Alternative Analysis for unjustified reasons

Fact:
The DEIS Table 2-2 "Alternatives and Technologies Considered but
rejected" states that the MLA was rejected by the Alternative analysis
because "MLA would not have supported Honolulu General Plan;
minimal impact to vehicle miles traveled and vehicles hours of delay"

Discussion:
1) A portion of the Honolulu General Plan is shown below and taken
from : <http://honoluluodpp.org/planning/GeneralPlan/GPPreamble.pdf>

"Purpose of the Honolulu General Plan -
The General Plan for the City and County of Honolulu is a written
commitment by the City and County government to a future for the
Island of Oahu which it considers desirable and attainable. The Plan is a
statement of the long-range social, economic, environmental, and design
objectives for the general welfare and prosperity of the people of Oahu
and is a statement of broad policies which facilitate the attainment of the
objectives of the Plan.
The General Plan is a guide for all levels of government, private
enterprise, neighbor- hood and
citizen groups, organizations, and individual citizens in eleven areas of
concern:
(1) population;
(2) economic activity;
(3) the natural environment;
(4) housing,
(5) transportation and utilities
(6) etc."

2) A 10 mile, elevated Managed Lane (reversible three lanes) was built
in Tampa for \$420 million or \$42 million per mile. Evaluation of a similar
11 mile, three-lane reversible MLA on Oahu would cost \$900 million (
www.eng.hawaii.edu/~panos/UHCS.pdf) and would have the capability
to eliminate the two major
H-1 traffic bottlenecks at H-1/H-2 merge and at the Middle Street merge.
Elimination of the two major H-1 bottlenecks by the MLA would comply
with the Honolulu General Plan as it relates to the General Plan

objective , "Transportation and Utilities". The Traffic Capacity Analysis below shows that the MLA will have the capacity to eliminate the bottlenecks while the rail does not. Conversely, the \$6.0 Billion steel wheel fixed guideway alternative will cause a severe vehicular traffic overload at the two H-1 bottlenecks in the capacity analysis below and will not support the Honolulu General Plan.

3) Moreover, by removing the two major H-1 bottlenecks, the MLA would substantially reduce the "vehicle miles traveled and vehicles hours of delay" as compared with the steel wheel fixed guideway SINCE THE Fixed guideway would result in severe traffic overload on H-1 in year 2030 (see capacity analysis below).

4) The single, most important goal for mass transit is to eliminate or substantially reduce traffic congestion. The MLA meets this goal while the fixed guideway does not.

Mass Transit Options Traffic Capacity Analysis:

Numbers from Table 3-12 of city 2006 Nov Alternative Analysis (\$10 million report):

Rail only: capacity = 6000 commuters per peak hour (equivalent 5000 vehicles per peak hour.)

H-1 only: rated capacity = 9,500 vehicles per hour (equivalent 15,400 commuters per hour)

H-1 forecast yr 2030 traffic load = 17,500 vehicles per hour per City AA Table 3-12 (or 8,000 vph overload = 9,600 commuters per hour)

Managed Lane three-Lane HOV Reversible Kamehameha Flyover: capacity = 6,000 high occupancy vehicles per hour (equivalent 21,600 commuters per hour). Capacity based on HOV use on Kamehameha Flyover by 200 express buses per peak hour , car pools, van pools, green cars and HOV2. (50 pns per express bus and 5800 vph at avge 2 pns per vehicle).

Year 2030 commuter load by City AA Report = Rail (6000) + H-1 overload (9,600) + H-1 capacity (15,400) = 31,000 commuters.

2030 Load = 31,000 commuters per hour

Rail + H-1 = 21,400 commuters per hour

Managed Lane HOV + H-1 = 37,000 commuters per hour

Finding: Fixed Guideway does not have sufficient commuter capacity which will cause 9,600 commuters to be stuck in gridlock on H-1 or stuck at rail stations (especially at stations between Waipahu and Kalihi). Managed Lane Alternative (HOV) will eliminate congestion and bottlenecks on H-1.

Conclusion:

The Alternative Analysis is wrong by rejecting the MLA because when compared with the fixed guideway alternative, the MLA will remove H-1 Traffic bottlenecks and will support Honolulu General Plan and will substantially reduce vehicles miles traveled and substantially reduce vehicles hours of delay.

Recommendation:
It is recommended that a three-lane MLA be reinstated into the DEIS for further consideration as a viable mass transit locally preferred alternative (LPA).

Respectfully,

Ben Ramelb P.E.
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Reply Requested :
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FOIA Referral Date :
FOIA Response Date :

Yes
Draft EIS Comment

RECORD # 242 DETAILS

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Other Submission Method :
Submission Date : 12/29/2008

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue : The DEIS and
Alternative Analysis lacks a wide range of alternatives

Discussion:

The Alternative Analysis and DEIS failed to provide "... an assessment of a wide range of public transportation alternatives ..." and/or "... sufficient information to enable the Secretary to make the findings of project justification ..." as required by statute.

In addition, we believe that you will find that the City, PB and FTA failed to, "Rigorously explore and objectively evaluate all reasonable alternatives," and "Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits," as required by the Council on Environmental Quality (CEQ) Sec. 1502.14.

Four alternatives should be assessed:

- 1) BRT transit system as proposed by the Harris Administration. The BRT route downtown should be limited to King and Beretania Streets and exclude Dillingham Blvd and Kapiolani Blvd.
- 2) Managed Lane (reversible) as proposed by Professor Panos Prevedourous Study, "Transportation Alternatives Analysis for Mitigating Traffic Congestion between Leeward Oahu and Honolulu" which shows the 11 mile three-lane cost estimate to be \$900 million which is in line with the \$320 million Tampa three-lane reversible transitway.
- 3) Former mayoral candidate Ann Kobayashi's proposal for a 15 mile EzWay. See <http://www.honoluluadvertiser.com/article/20081015/NEWS01/810150392/1001>
- 4) Build two elevated highway bypasses around the H-1 bottlenecks at H-1/H-2 merge and at Middle St. merge. The bypasses include: a) a 4 mile, three-lane reversible elevated hwy over the Kamehameha Hwy median between the H-1/H-2 merge and the H-1 Viaduct at Aloha Stadium and b) a 3 mile, three-lane reversible elevated hwy over the Nimitz Hwy median between the H-1 Viaduct at Keehi Lagoon Drive and Hotel St/Alakea St./ Halekauwila St/Ala Moana Blvd. An on/off ramp to Waikamilo Rd from the Nimitz bypass would reduce the number of lanes from three to two between Waikamilo Rd and Iwilei. See attachment for more information on HOV Flyovers.

Recommendation: Include the above four alternatives in the DEIS.

Respectfully,

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Attachment – Description of Nimitz and Kamehameha HOV Flyovers
Nimitz Flyover, Reversible HOV:

The Nimitz HOV Flyover is a 3-mile reversible, elevated, three-lane structure over the Nimitz Highway median from the Airport Viaduct at Keehi Lagoon to Hotel Street and Alakea St/Halekauwila St. The Flyover would be built similar to the Tampa Elevated three-lane Reversible HOV as described in-

<http://www.tollroadsnews.com/node/172>

One of the three lanes would exit the Flyover at Waikamilo Rd. to provide access to job centers in Kalihi, resulting in the Flyover having only two lanes entering downtown. The downtown terminal connections from the Nimitz HOV Flyover include an elevated busway from Iwilei to Hotel Street and a single lane underpass to both Alakea St/Halekauwila Streets. These connections are described in a Managed Lane Study "Transportation Alternatives Analysis for Mitigating Traffic congestion between Leeward Oahu and Honolulu". The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.

The initial 2005 cost for the 10 mile Tampa Reversible was \$320 million or \$32 Million per highway mile, however, a geotechnical design error increased the cost to \$420 million or \$42 million per mile. Using a geographic and escalation factor of 100 percent, the 3-mile Nimitz HOV Flyover at \$60 to \$80 million per mile would cost \$180 million to \$240 million.

The "Nimitz Flyover" has an approved Final Environmental Impact Statement which allows for early construction.

Kamehameha Flyover, Reversible HOV:

The Kamehameha HOV Flyover is a 4-mile reversible, elevated, three-lane structure over the median of Kamehameha Highway from the H-1/H-2 merge at the Waiawa Interchange to the Airport Viaduct just diamond head of the Aloha Stadium. The Flyover would be built similar to the Tampa Elevated three-lane Reversible HOV as described in <http://www.tollroadsnews.com/node/172> .

The Kamehameha Flyover would be connected to H-1, H-2, Kamehameha Highway and Farrington Highway at the west end and to the Airport Viaduct at the east end. These connections are described in a Managed Lane Study "Transportation Alternatives Analysis for Mitigating Traffic congestion between Leeward Oahu and Honolulu". The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.

The initial 2005 cost for the 10 mile Tampa Reversible was \$320 million or \$32 Million per highway mile, however, a geotechnical design error increased the cost to \$420 million or \$42 million per mile. Using a geographic and escalation factor of 100 percent, the 4-mile Kamehameha HOV Flyover at \$60 to \$80 million per mile would cost between \$240 million to \$320 million.

The Draft Environmental Impact Statement (DEIS) - Honolulu High-Capacity Transit Corridor Project Nov 2008 , shows the rail route over Kamehameha Highway between Pearl City and Aloha Stadium which could conflict with the proposed three-lane "Kamehameha Flyover" route outlined above. If the rail is built, it is suggested that both the Kamehameha Highway "Flyover" and the Rail be built within the elevated Kamehameha Highway corridor. In this case, only a two-lane "Kamehameha Flyover" is needed (instead of three-lanes) to be built alongside and parallel to the Rail transit. The rail with a capacity of 6,000 commuters per hour and the two-lane "Kamehameha Flyover", with a capacity of 4,000 vehicles per hour, should be adequate to substantially reduce the bottleneck at the H-1/H-2 merge and the traffic congestion on H-1 between Pearl City and Aloha Stadium.

Reply Requested :

Yes

Submission Type :

Draft EIS Comment

FOIA (Freedom of Information Request) Request :

FOIA Referral Date :

FOIA Response Date :

RECORD # 243 DETAILS

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Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue : The Alternative
Analysis evaluation of the Managed Lane Alternative was flawed which
caused the MLA to be excluded from further consideration in the DEIS

Discussion:
The Alternative Analysis rigged the specifications and analysis of the
Managed Lane Alternative . DEIS Chapter 2 summarizes alternatives
considered for the Honolulu High-Capacity Transit Corridor Project. The
alternatives considered were chosen primarily by the Alternative
Analysis published in 2006.

The AA was flawed because it failed to include several transit
alternatives, each with a capability to substantially reduce or eliminate
the traffic congestion bottlenecks on H-1 at Pearl City and Middle St.
merge in year 2030. As shown on Table 3-12 of the AA and DEIS Table
3-12, all rail alternatives result in worse traffic congestion on H-1 AFTER
any rail alternative is built and operating.

The fact that rail will worsen congestion on H-1 after spending a
minimum of \$6.2 Billion for the Rail alternative, it is totally unacceptable
to the Oahu taxpayer to continue to face worse traffic congestion on H-1.
The single and most important reason for building a "mass transit
system" is to substantially reduce or eliminate traffic congestion". The
AA and DEIS fails to include this most important purpose and need for
mass transit and therefore the AA and DEIS must be revised to include,
as a need, to substantially reduce or eliminate traffic congestion.

Accordingly, as a minimum, the DEIS should include the following four
additional alternatives for assessment on environmental impact:

- 1) BRT transit system as proposed by the Harris Administration. The
BRT route downtown should be limited to King and Beretania Streets
which can accommodate a BRT system and exclude Dillingham Blvd
and Kapiolani Blvd which are too narrow to accommodate a BRT
system.
- 2) Managed Lane (reversible) as proposed by Professor Panos
Prevedouros Study, "Transportation Alternatives Analysis for Mitigating
Traffic Congestion between Leeward Oahu and Honolulu" published
March 2008, which shows the 11 mile three-lane cost estimate to be
\$900 million which is in line with the \$320 million Tampa three-lane
reversible transit way.

3) Former mayoral candidate Ann Kobayashi's proposal for a 15 mile EzWay. See <http://www.honoluluadvertiser.com/article/20081015/NEWS01/810150392/1001>

4) Build two elevated highway bypasses around the H-1 bottlenecks at H-1/H-2 merge and at Middle St. merge. The bypasses include: a) a 4 mile, three-lane reversible elevated hwy over the Kamehameha Hwy median between the H-1/H-2 merge and the H-1 Viaduct at Aloha Stadium and b) a 3 mile, three-lane reversible elevated hwy over the Nimitz Hwy median between the H-1 Viaduct at Keehi Lagoon Drive and Hotel St/Alakea St./ Halekauwila St/Ala Moana Blvd. An on/off ramp to Waikamilo Rd from the Nimitz bypass would reduce the number of lanes from three to two between Waikamilo Rd and Iwilei. See attachment for more information on HOV Flyovers.

Recommendation: Include the above four alternatives in the DEIS.

Respectfully,

Ben Ramelb P.E.
1148 Ala Liliroi St.
Honolulu HI 96818

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One of the three lanes would exit the Flyover at Waikamilo Rd. to provide access to job centers in Kalihi, resulting in the Flyover having only two lanes entering downtown. The downtown terminal connections

from the Nimitz HOV Flyover include an elevated busway from Iwilei to Hotel Street and a single lane underpass to both Alakea St/Halekauwila Streets. These connections are described in a Managed Lane Study "Transportation Alternatives Analysis for Mitigating Traffic congestion between Leeward Oahu and Honolulu". The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.

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Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :

Yes
Draft EIS Comment

RECORD # 244 DETAILS

Status : Initial Action Needed
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Submission Content/Notes : 29 December, 2008

To:

Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
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HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue : City Alternative
Analysis (AA) incorrectly inflates Managed Lane Alternative (MLA) cost
of \$2.6 Billion which wrongly excludes MLA from further transit
consideration in the DEIS

Facts:

- 1) 2006 Alternative Analysis show 14 mile, two lane elevated MLA capital cost at \$2.6 Billion or \$185 Million per mile.
- 2) AA shows 20 mile Rail to Ala Moana Shopping Center cost at \$3.7 Billion or \$180 million per mile.
- 3) Wayne Yoshioka, on Olelo 22 July 2008, 19 minutes into video, <http://www.honolulutransit.org/video/?id=9>, stated " \$3.7 Billion includes \$1.0 Billion contingency". Thus the 20 mile Rail cost estimate, without contingency, is \$2.7 Billion or \$135 million per mile.
- 4) The Rail project includes 180 + land acquisitions, 20 miles elevated structure, nineteen, four-story or higher rail stations., electric substations at each rail station, steel rails and the heavy copper lines to convey the high electrical load, escalators, elevators, and office/bathrooms/roadways/parking facilities at each rail station. Conversely, the MLA will have zero rail stations on the entire 11 mile length.
- 5) The ORTP 2030 link
http://oahumpo.org/ortp/ORTP2030/OMPO_Report_FINAL.pdf
Shows the 2.2 mile Nimitz two lane elevated flyover at \$250 million (State DOT cost Estimate) or \$113 million per mile.
- 6) The 10 mile Tampa three-lane elevated
<http://www.tollroadsnews.com/node/172> cost \$420 million or \$42 million per mile.
- 7) The MLA would cost twice as much per lane mile as H-3, the most expensive highway because it had to bore two tunnels through the Koolaus.
- 8) Professor Panos Prevedouros study "Transportation Alternative Analysis for Mitigating traffic Congestion between Leeward Oahu and Honolulu" March 2008, shows a cost estimate for a three lane, 11 mile elevated Managed Lane for \$900 million or \$81 million per mile. The Managed Lane facility is similar in construction to the Tampa three lane elevated reversible. The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.

Discussion:

- a) The city AA discarded the MLA because of high cost and that it would not solve traffic congestion.
- b) The DEIS does not include the MLA because it was discarded by the AA from further consideration.
- c) The cost estimates above show that the MLA would cost not more than \$900 million based on the similar Tampa three lane reversible. Even is the MLA were to use the State of Hawaii's estimate in the ORTP, the 11 mile MLA would cost \$113 million per mile or \$1.2 Billion.
- d) If the two lane elevated MLA uses the elevated rail cost at \$135 million per mile, the MLA would cost \$1.5 Billion, far less than the AA estimate of \$2.6 Billion.

Conclusion:

The AA cost estimate for the MLA at \$2.6 Billion is incorrect and should be revised to less than \$1.0 Billion. Further, the MLA should be restudied within the DEIS process if the DEIS is to comply with NEPA.

Recommendation:

It is recommended that the Council on Environmental Quality (CEQ), in conjunction with the USDOT, require the FTA and the CITY re-assess the MLA in the EIS process. City and FTA re-study the MLA as an 11 mile, three-lane elevated reversible transit way within the DEIS process if the DEIS is to comply with NEPA.

Respectfully,

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To:
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Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
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FAX: (808) 587-6080

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 Kalauao. 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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RECORD # 246 DETAILS

Status : Initial Action Needed
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Submission Date : 12/29/2008

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
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650 South King St. 3rd Floor
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FAX: (808) 587-6080

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) do not conform 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. NO.
- #2 Provide efficient, convenient and cost-effective transit service to Oahu citizens. NO
- #3 Encourage the availability of adequate public and private services

between Waikiki, the airport and other tourist destinations. NO

#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. NO

#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. NO

#10 Promote planning, design and construction of transportation facilities and systems to support economic development and vitality. NO

#11 Provide major rehabilitation/renewal/modernization of facilities in sufficient magnitude to ensure continued effective operation. NO

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. NO
- #13 Encourage energy conservation in transportation. NO
- #14 Preserve Oahu's cultural integrity and sensitive natural resources, including beaches, scenic beauty, and sea and mountain vistas. NO
- #15 Develop and maintain alternative transportation facilities, including bikeways,

walkways and other environmentally-friendly elements which can be safely integrated with other transport modes. NO

#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. NO

#17 Minimize disruption of existing neighborhoods from construction of the transportation system. NO

#18 Ensure that transportation facility design and maintenance are compatible with the existing and planned physical and social character of new and existing developments. NO

#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. NO

#20 Develop transportation contingency plans for energy shortages, natural and manmade disasters and other emergencies that would impact the transportation system. NO

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. NO

#22 Encourage innovation in planning, design and maintenance of transportation services and facilities. NO

#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. NO

Findings:

The DEIS purpose and needs stated in paragraphs 1.7 and 1.8 do not

conform with many ORTP 2030 Goals and Objectives noted above for one or more reasons:

(1) Rail transit will result in a net DECREASE in peak-period person-carrying capacities on Oahu's transportation network,

(2) The \$6.8 Billion rail is not cost effective because rail 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 Kalauao ,

(3) Rail transit will not service Waikiki,

(4) The rail transportation system is not cost effective because it does not allow express buses to run in a corridor parallel to the rail route to reduce congestion on H-1 during peak hour,

(5) Rail will not provide relief to increased congestion on H-1 at the H-1/H-1 merge and at Middle St. merge by year 2030. Therefore, rail will not enhance the integration and connectivity of the regional transportation system; will not promote planning, design and construction of transportation facilities and systems to support economic development and vitality; and will not provide major rehabilitation/renewal/modernization of facilities in sufficient magnitude to ensure continued effective operation.

(6) Rail will cause more vehicles to be stuck in gridlock on H-1 and will therefore exceed noise, air and water quality standards set forth by federal, state and local agencies and energy conservation in transportation because rail will result in 8,000 vehicles per hour being stuck in gridlock on H-1 during the am peak period.

(7) The elevated rail located downtown be a visual blight downtown and will not preserve Oahu's cultural integrity and sensitive natural resources, including beaches, scenic beauty, and sea and mountain vistas.

(8) The rail route on Salt Lake Blvd and Dillingham Blvd instead of the H-1 Viaduct and Nimitz Highway will maximize disruption of existing neighborhoods from construction of the transportation system.

Conclusion:

The elevated rail will cause severe traffic congestion on H-1 during peak hour, will force more vehicles to be stuck in gridlock causing worse pollution, less reliability for many commuters at the rail station waiting for commuter room on the fully loaded train and will cause a visual blight downtown.

Recommendation:

The DEIS must add more transit alternatives such as:

1) an elevated HOV three-lane transit way from Waikale to downtown Hotel and Alakea Sts as described in Professor Panos Prevedouros Report "Transportation Alternatives Analysis for Mitigating Traffic Congestion between Leeward Oahu and Honolulu, Mar 2008." The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.

2) BRT proposed by former Mayor Harris in early 2002 or 2003.

3) Build two separate, three-lane Flyovers, Nimitz and Kamehameha (between Waiawa Interchange and Halawa Interchange). Note that the

two Flyovers has the capacity to eliminate the bottlenecks on H-1 as shown below ("Transit Alternatives Traffic Capacity").

Transit Alternatives Traffic Capacity

Numbers from Table 3-12 of city 2006 Nov Alternative Analysis (\$10 million report): (Rail DEIS contains insufficient information to determine extent of congestion on H-1 and other highways at Kalauao (Pearl City)).

Rail only: capacity = 6000 commuters per peak hour

H-1 only: rated capacity = 9,500 vehicles per hour (equivalent 15,400 commuters per hour (some commuters are on express buses)

H-1 forecast yr 2030 traffic load = 17,500 vehicles per hour per City AA Table 3-12 (or 8,000 vph overload (on H-1) = 9,600 commuters per hour)

Managed Three-lane HOV Reversible Flyover: capacity = 6,000 high occupancy vehicles per hour (equivalent 21,600 commuters per hour). Capacity based on HOV use on Flyover by 200 express buses per peak hour, car pools, van pools, green cars and HOV2 or HOV3. (commuter capacity = 50 pns per express bus plus 5,800 vph at avge 2 pns per vehicle).

Year 2030 commuter load by City AA Report = Rail (6000) + H-1 overload (9,600) + H-1 capacity (15,400) = 31,000 commuters.

2030 Load = 31,000 commuters per hour

Rail + H-1 = 21,400 commuters per hour

Managed Lane HOV + H-1 = 37,000 commuters per hour

Conclusion: Rail does not have sufficient commuter capacity which will cause 9,600 commuters to be stuck in gridlock on H-1 or stuck at rail stations (especially at stations between Waipahu and Kalihi). Managed Lane HOV Flyover Alternative will eliminate congestion and bottlenecks on H-1.

Respectfully,

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RECORD # 247 DETAILS

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Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
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650 South King St. 3rd Floor
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FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project",

Issue : The DEIS lacks goal to eliminate or substantially reduce traffic congestion

Discussion:

DEIS Section 1.8 cites needs for Transit improvements but does not include the single and most important reason for building mass transit: To provide TRAFFIC RELIEF during peak hour. The city cit Alternative Analysis and DEIS show that rail transit, despite costing over \$6.0 billion, will not provide traffic relief. In fact, after rail is built and operating, The AA shows that the traffic overload on H-1 (capacity – 9,500 vehicles per hour) at Kalauao will rise from the present 11,000 vph to 17,400 vph!

Therefore rail should NOT be considered as a candidate for Oahu mass transit because it does not accomplish the "MISSION" of mass transit. ALL other reasons for building rail transit are secondary and do NOT justify spending at least \$6.0 Billion of taxpayers dollars.

I have read the City's Alternative Analysis and UH Professor Panos Prevedouros Study "Transportation Alternative Analysis for Mitigating Traffic Congestion between Leeward Oahu and Honolulu." The HOT Lanes outlined in the Professor's study will provide a separate express highway to bypass the known traffic bottlenecks at Pearl City and at Middle Street and will reduce H-1 congestion by 35 percent. HOT will cost of less than \$900 Million (Tampa built a similar 10 mile three-lane HOT for \$320 million in 2005.

Another option is to build two Flyover bypasses around the two major H-1 bottlenecks described as follows:

Nimitz Flyover, Reversible HOV:

The Nimitz HOV Flyover is a 3-mile reversible, elevated, three-lane structure over the Nimitz Highway median from the Airport Viaduct at Keehi Lagoon to Hotel Street and Alakea St/Halekauwila St. The Flyover would be built similar to the Tampa Elevated three-lane Reversible HOV as described in-

<http://www.tollroadsnews.com/node/172> .

One of the three lanes would exit the Flyover at Waikamilo Rd. to provide access to job centers in Kalihi, resulting in the Flyover having only two lanes entering downtown. The downtown terminal connections from the Nimitz HOV Flyover include an elevated busway from Iwilei to

Hotel Street and a single lane underpass to both Alakea St/Halekauwila Streets. These connections are described in a Managed Lane Study "Transportation Alternatives Analysis for Mitigating Traffic congestion between Leeward Oahu and Honolulu". The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.

The initial 2005 cost for the 10 mile Tampa Reversible was \$320 million or \$32 Million per highway mile, however, a geotechnical design error increased the cost to \$420 million or \$42 million per mile. Using a geographic and escalation factor of 100 percent, the 3-mile Nimitz HOV Flyover at \$60 to \$80 million per mile would cost \$180 million to \$240 million.

The "Nimitz Flyover" has an approved Final Environmental Impact Statement which allows for early construction.

Kamehameha Flyover, Reversible HOV:

The Kamehameha HOV Flyover is a 4-mile reversible, elevated, three-lane structure over the median of Kamehameha Highway from the H-1/H-2 merge at the Waiawa Interchange to the Airport Viaduct just diamond head of the Aloha Stadium. The Flyover should be built similar to the Tampa Elevated three-lane Reversible HOV as described in <http://www.tollroadsnews.com/node/172>.

The Kamehameha Flyover should be connected to H-1, H-2, Kamehameha Highway and Farrington Highway at the west end and to the Airport Viaduct at the east end. These connections are described in a Managed Lane Study "Transportation Alternatives Analysis for Mitigating Traffic congestion between Leeward Oahu and Honolulu". The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.

The initial 2005 cost for the 10 mile Tampa Reversible was \$320 million or \$32 Million per highway mile, however, a geotechnical design error increased the cost to \$420 million or \$42 million per mile. Using a geographic and escalation factor of 100 percent, the 4-mile Kamehameha HOV Flyover at \$60 to \$80 million per mile would cost between \$240 million to \$320 million.

The Draft Environmental Impact Statement (DEIS) - Honolulu High-Capacity Transit Corridor Project Nov 2008, shows the rail route over Kamehameha Highway between Pearl City and Aloha Stadium which could conflict with the proposed three-lane "Kamehameha Flyover" route outlined above. If the rail is built, it is suggested that both the Kamehameha Highway "Flyover" and the Rail be built within the elevated Kamehameha Highway corridor. In this case, only a two-lane "Kamehameha Flyover" is needed (instead of three-lanes) to be built alongside and parallel to the Rail transit. The rail with a capacity of 6,000 commuters per hour and the two-lane "Kamehameha Flyover", with a capacity of 4,000 vehicles per hour, should be adequate to substantially reduce the bottleneck at the H-1/H-2 merge and the traffic congestion on H-1 between Pearl City and Aloha Stadium.

Conclusion:

The Kamehameha and Nimitz Flyovers are cost effective alternatives for mass transit.

Recommendation:

Include the Kamehameha Flyover and Nimitz Flyover Alternatives for

mass transit consideration in the DEIS.

Respectfully,

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To:
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650 South King St. 3rd Floor
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FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue : DEIS does not
include Managed Lane alternative as stated in the Notice of Intent (NOI)

Fact:
DEIS Table 3-20 provides existing traffic volumes but does not provide
forecasted volumes with resultant Level of Service (LOS) for each
specific highway.

NEPA violation: The DEIS lacks the Managed Lane Alternative (MLA)
as stated in the Notice of Intent (NOI) dated 7 Dec 2007 (reference (a),
which states:

"The Federal Transit Administration (FTA) and the City and County of
Honolulu, Department of Transportation Services (DTS) intend to
prepare an EIS (and Alternative Analysis (AA)) on a proposal by the City
and County of Honolulu to implement transit improvements that
potentially include high-capacity transit service in a 25-mile travel
corridor between Kapolei and the University of Hawaii at Manoa and
Waikiki. Alternatives proposed to be considered in the AA and draft EIS
include No Build, Transportation System Management, Managed Lanes,
and Fixed Guideway Transit. Other transit alternatives may be identified
during the scoping process."

Rationale: The process used by the City & County of Honolulu (City) for
assessing the Managed Lane Alternative (MLA) in the City's Alternatives
Analysis (AA) was flawed.

a) A similar length Managed Lane, reversible three-lane transit way was
built for \$320 million in Tampa in year 2005, while the City AA estimated
the similar MLA to cost \$2.6 Billion.

b) Professor Panos Prevedouros published a study for Managed Lanes
(reversible) in March 2008, " Transportation Alternatives Analysis for
Mitigating Traffic Congestion between Leeward Oahu and Honolulu"
which shows the 11 mile three-lane cost estimate to be \$900 million
which is in line with the \$320 million Tampa three-lane reversible
transitway. The professor believes the Plan's costs are accurate based
on cost estimate spreadsheet analysis received from a local heavy
construction estimation expert is \$818,634,000 in 2008 dollars. Again,
this estimate is more in line with the Tampa Transit way estimate and
refutes the AA estimate of \$2.6 Billion. The AA estimate disqualified the
Managed Lane Alternative to be inferior to the Rail Alternative which

cost \$3.7 Billion.

c) 2008 Mayoral Candidate Ann Kobayashi, using the Professor's 4 year Managed Lane study and the former Mayor Harris Administration BRT Study, proposed a similar Managed Lane 15-mile fixed guideway which is estimated at \$1.2 Billion. The estimate is similar to the 11 mile Managed Lane and which should have been used in the AA rather than \$2.6 Billion.

d) Parsons Brinkerhoff (PB) and the City proposed that automobiles with two or more occupants should be allowed toll free on the MLA. This made the current contraflow zipper lane untenable and thus provided the rationale for removing it. The net result was that the additional two lane advantage that the MLA offered to the Corridor was reduced to one lane. They failed to publish their assessment of the option of having all autos pay a toll, which would have resulted in the zipper lane and the two-lane advantage being retained. And they failed to analyze MLA options with higher occupancy thresholds, such as three through five occupants.

e) PB and the City added unnecessary costs to the project by proposing a 16-mile facility while not testing the viability of shorter 10 to 12-mile versions.

f) PB and the City inflated MLA operating costs to make the project appear uncompetitive with the Fixed Guideway Alternative. Just two examples are a) the projection of a totally unnecessary 5,400 parking stalls for the MLA, and b) saddling the MLA with inflated bus operating costs.

g) PB and the City engineered the ingress and egress ramps in a way that could only result in heavy traffic congestion at these points. In fact, the MLA has exit/off ramps along its route for access to job centers other than downtown Honolulu.

h) PB and the City grossly inflated the capital costs of the MLA with the result that, if correct, it would be twice the cost per lane mile of any highway ever built in the U.S. In his letter to the City and copied to FTA, Dr. Panos Prevedouros, Professor of Traffic Engineering at the University of Hawaii, Chair of the Transportation Research Board's Highway Micro-simulations Committee and a member of the Task Force, commented, "the most egregious violation of FTA's rules on alternative specification and analysis was the deliberate underengineering of the Managed Lanes Alternative to a degree that brings ridicule to prevailing planning and engineering principles."

i) The 11 mile, elevated MLA, with three lanes as proposed by Professor Prevedouros, has the future commuter capacity to eliminate the two H-1 bottlenecks at Pearl City and at Middle Street merge. The Rail, according to the AA, table 3-12, will result in 17,500 vehicles per hour on H-1 (H-1 full capacity = 9,500 vph) because the Rail cannot accommodate the full commuter demand in year 2030.

Conclusion: The City's AA wrongly estimated the cost of the Managed Lane alternative and the MLA capacity to eliminate the H-1 bottlenecks on H-1.

Recommendation: It is requested that the Managed Lane Alternative as proposed by Ann Kobayashi's EzWay proposal or the Professor Prevedouros Managed Lane Study be reinstated into the Honolulu's Transit Corridor Draft Environmental Impact Statement

Respectfully,

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Reference (a):
[Federal Register: December 7, 2005 (Volume 70, Number 234)]
[Notices]
[Page 72871-72873] From the Federal Register Online via GPO Access
[wais.access.gpo.gov] [DOCID:fr07de05-137]

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To:
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City and County of Honolulu
650 South King St. 3rd Floor
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FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue : The purpose
and needs statement of the project in the DEIS is flawed because it does
not comply with the Notice of Intent (NOI) dated 7 Nov 2005.

Discussion: DEIS page 1-19 states " The purpose of the Honolulu High
Capacity transit Corridor Project is to provide high capacity rapid transit
in the highly congested east-west transportation corridor between
Kapolei and UH Manoa."

The NOI states that the Federal Transit Administration (FTA) and the
City and County of Honolulu, Department of Transportation Services
(DTS) intend to prepare an EIS (and Alternative Analysis (AA)) on a
proposal by the City and County of Honolulu to implement transit
improvements that potentially include high-capacity transit service in a
25-mile travel
corridor between Kapolei and the University of Hawaii at Manoa and
Waikiki.

The DEIS does not comply with the purpose because the DEIS does not
include a route assessment to Waikiki and to UH Manoa.

Conclusion: The purpose and needs statement of the project in the
DEIS is flawed because the DEIS does not include a route assessment
to Waikiki and to UH Manoa consistent with Notice of Intent (NOI) dated
7 Nov 2005.

Recommendation: Include an environmental impact statement for the
full route to include all environmental impacts from Kaelaeloa to UH
Manoa, to Ala Moana Shopping Center and to Waikiki.

Respectfully,

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Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue : Rail will worsen
net transit transportation in West Oahu Corridor despite fact that Rail
will cost over \$6 Billion

Fact: The 7 December 2005 Notice of Intent states "The Federal
Transit Administration (FTA) and the City and County of Honolulu,
Department of Transportation Services (DTS) intend to prepare an EIS
(and Alternative Analysis (AA)) on a proposal by the City and County of
Honolulu to implement transit improvements that potentially include high-
capacity transit service in a 25-mile travel corridor between Kapolei and
the University of Hawaii at Manoa.

Discussion:

1) The City Alternative Analysis , Table 3-12, shows that there will still
be 17,500 vehicles per hour in 2030 on the H-1 (full rated capacity =
9,500 vehicles per hour) at Pearl City AFTER the \$7.0 Billion Rail is built
and operating.

2) The DEIS Screenline Volumes for the 2030 Salt Lake Build
Alternative is shown on Table 3-20, page 3-38.

a) With the Salt Lake Build Alternative AT Screen line "D":
- Kalauao Koko Head bound : Observed (forecast) Volume - AM Peak =
18,910 vehicles per hour (vph)) - Reference: DEIS Table 3-20.
- Facility 2030 Capacity - AM Peak = 14, 650 vph - Reference: Table 3-
12 Alternative Analysis.

Result: There will be 4,260 vph above the facility (H-
1+HOV+Zipper+Kam+ Moanalua) capacity at Kalauao which indicates a
Level of Service (LOS) F AFTER the Salt Lake Rail is built. This
conclusion is consistent with the conclusion using the numbers from the
City's Alternative analysis report. With rail, the above numbers show
congestion will WORSEN after the \$7.0 Billion Full build out Rail is
completed.

b) With the Salt Lake Build Alternative AT Screen line "F":
- Kapalama Canal Koko Head bound : Observed (forecast) Volume -
AM Peak = 20,760 vehicles per hour (vph)) - Reference: Table 3-20.
- Facility 2030 Capacity - AM Peak = 15,300 vph - Reference: Table 3-
12 Alternative Analysis

Result: The traffic volume will be 5,460 vph above the facility (Nimitz, Dillingham, North King, H-1, School St) capacity at Kapalama Canal which indicates a Level of Service (LOS) F AFTER the Salt Lake rail is built. This conclusion is consistent with the conclusion using the numbers from the City's Alternative analysis report. With rail, the above numbers show congestion will WORSEN after the \$6.0 Billion Full build out Rail is completed.

Conclusion: The AA and DEIS fail in showing that Rail is a cost effective transit improvement because traffic congestion on H-1 will worsen from the current 11,000 vph to 17,500 vph in year 2030 (Alternative Analysis Table 3-12) despite building the \$6.0 Billion Rail.

Recommendation: Delete Rail transit because it fails to provide "transit improvements" and instead results in worse traffic congestion on H-1 after the \$6.0 Billion rail is built and operating. Consider other cost effective solutions to eliminate traffic congestion on H-1.

Respectfully,

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Draft EIS Comment

RECORD # 251 DETAILS

Status : Initial Action Needed
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Submission Method : Website
Other Submission Method :
Submission Date : 12/29/2008

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
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FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue : False and misleading DEIS statement on "Improve Corridor Mobility".

Fact:

Para. 1.8, pg. 1-20 states that transit improvements are needed to improve corridor mobility "because motorists and transit users experience substantial traffic congestion and delay at most times of the day.....Average speeds on the H-1 Freeway are currently less than 20 mph.... and will degrade even further by 2030."

Discussion:

The 2006 Alternative Analysis and DEIS propose Rail transit be built which will worsen traffic congestion on H-1 after the Rail is built. The City Alternative Analysis , Table 3-12, shows that there will still be 17,500 vehicles per hour in 2030 on the H-1 (full rated capacity = 9,500 vehicles per hour) at Pearl City AFTER the \$7.0 Billion Rail is built and operating.

The DEIS Screenline Volumes for the 2030 Salt Lake Build Alternative Table 3-20, shows that with the Salt Lake Build Alternative AT Screen line "D" :

- Kalauao Koko Head bound : Observed (forecast) Volume - AM Peak = 18,910 vehicles per hour (vph).
- Facility 2030 Capacity - AM Peak = 14, 650 vph - Reference: Table 3-12 Alternative Analysis.

Result: There will be 4,260 vph above the facility (H-1 + HOV + Zipper + Kam+ Moanalua) capacity at Kalauao which indicates a Level of Service (LOS) F AFTER the Salt Lake Rail is built. This conclusion is consistent with the conclusion using the numbers from the City's Alternative analysis report. With rail, the above numbers show congestion will WORSEN after the \$7.0 Billion Full build out Rail is completed.

The \$7.0 Billion Steel wheel on steel rail transit system is NOT a cost effective means of providing improved mobility. A fully-elevated, steel-wheel rail transit system can move only 6,000 commuters (4000 standees, 2000 seated) per hour during peak travel periods while the 2030 commuter demand for RAIL will reach 15,600 commuters per hour, according to Table 3-12 of the Alternative Analysis. Similarly, Table 3-20 of the DEIS shows traffic overload on H-1 during peak travel periods.

Conclusion: The \$7.0 Billion Steel Rail is not cost effective to substantially reduce or eliminate the bottlenecks on H-1 and will REDUCE MOBILITY which is contrary to the goal of the DEIS.

Recommendation: Reject the Steel Wheel on Steel Rail transit system and select other more cost effective transit systems which will improve mobility. Cost effective transit systems which will have the capacity to eliminate H-1 congestion include Managed Lane Alternative, BRT, EzWay or two highway bypasses around the H-1 bottlenecks at Pearl City and at Middle Street merge.

Respectfully,

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RECORD # 252 DETAILS

Status : Initial Action Needed
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Submission Content/Notes : 29 December, 2008

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Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue False and misleading DEIS statement on Corridor Travel Reliability.

Fact:
Para. 1.8.2, pg. 1-20 states that "As more roadways become more congested.... because of traffic accidents or heavy rain..... a need exists to provide a more reliable transit system."

Discussion:
A fully-elevated, steel-wheel on steel rail transit system can move only 6,000 commuters (4000 standees, 2000 seated) per hour during peak travel periods while the 2030 commuter demand for RAIL will reach 15,600 commuters per hour, according to Table 3-12 of the Alternative Analysis.

Commuter demand of 15,600 commuters per hour in year 2030 is calculated thus:
City AA, Table 3-12 shows year 2030 forecast volume of 17,500 vph on H-1(full rated capacity = 9,500 vph) with the rail built and operating. Therefore, there is an overload on H-1 Freeway of 8,000 vph = 9,600 commuters per hour that needs to get on the \$7.0 Billion Rail transit which already carries 6,000 commuters per hour.

The EzWay or Managed Lane alternatives have the capacity to accommodate the total 2030 demand. The Managed Lanes or EzWay will each have three lanes, each lane has a capacity of 2000 vph. For three lanes, the vehicular capacity is 6000 vehicles per hour. The Managed Lane Alternative person capacity is calculated thus:

Projected use of the HOT during peak hour includes:
200 express buses w/~50 pns = 10,000 pns
500 HOV5 (carpool) = 2,500 pns
500 vanpool (~5pns) = 2,500 pns.

Remaining excess capacity available for low occupancy green vehicles:
6,000 vph minus (200 + 500 + 500) = 4,800 vph. 4,800 low occupancy vehicles

Average persons per vehicle = 1.2 pns per vehicle

4,800 vehicles with 1.2 pns = 5700 pns

Summary: Managed Lane persons capacity = 10,000 + 2,500 + 2,500 + 5,700 = ~ 20,700 pns

Conclusion:

There will be $9,600 + 6,000 = 15,600$ commuters per hour that must get on the train during peak travel period. However, 9,600 commuters per hour will NOT be able to board the train because the train has insufficient commuter capacity during peak travel period. Therefore, the train cannot be considered a RELIABLE form of transit because it has insufficient commuter capacity.

Recommendation: Rail Transit should be eliminated as the preferred alternative because it does not meet the test of Travel Reliability. The DEIS should include cost effective transit systems which will have the capacity to eliminate H-1 congestion include Managed Lane Alternative, BRT, EzWay or two highway bypasses around the H-1 bottlenecks at Pearl City and at Middle Street merge.

Respectfully,

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RECORD # 253 DETAILS

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Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue : DEIS
incorrectly compares rail alternatives with No-Build Alternatives.

Discussion:
DEIS pg. 4-1 states "In this document, the No Build Alternative serves as an environmental baseline to which the impacts of other alternatives are compared."

The DEIS contains only rail alternatives and a "No-build" alternative which wrongfully draws conclusions detrimental to the environment. There are other low-cost alternatives considered superior in providing traffic relief and cost which were wrongfully deleted or not included in the DEIS and Alternative Analysis.

These cost effective transit alternatives include an 11 mile Managed Lane, a 15 Mile EzWay, a BRT fixed Guideway and two highway bypasses around the bottlenecks at Pearl City and at Middle Street Merge. All of these alternatives would cost no more than \$1.2 Billion and would eliminate the bottlenecks at Pearl City and at Middle Street Merge.

Conversely, the Steel wheel on steel rail alternatives included in the DEIS ALL cost no less than \$6.28 Billion (Table 6-2 DEIS). Moreover, after the \$6.28 Billion Rail is built and operating, traffic congestion on H-1 will worsen as shown on table 3-12 of the Alternative Analysis and on DEIS Table 3-20. The AA shows 17,500 vehicles per hour on the H-1 freeway (rated full capacity = 9,500 vph). The DEIS Table 3-20 shows there will be 4,200 vph above the vehicle capacity of the highway facilities heading Koko Head bound during the morning peak period.

Conclusion: If the DEIS Rail alternatives are compared with the other transit alternatives including Managed Lanes, EzWay, BRT, and bypass highways, each rail alternative would be inferior to the "other" transit alternatives, both in terms of cost effectiveness and for providing traffic relief.

Recommendation:
The DEIS must add more transit alternatives such as BRT, Managed Lane, EzWay, and two bypass highways, into the DEIS which can then be compared with the rail alternatives to arrive at a more logical locally

preferred alternative (LPA):

- 1) an elevated HOV three-lane transit way from Waikale to downtown Hotel and Alakea Sts as described in Professor Panos Prevedouros Report "Transportation Alternatives Analysis for Mitigating Traffic Congestion between Leeward Oahu and Honolulu, Mar 2008." The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.
- 2) BRT proposed by former Mayor Harris in early 2002 or 2003.
- 3) Build two separate, three-lane Flyovers, Nimitz and Kamehameha (between Waiawa Interchange and Halawa Interchange). Note that the two Flyovers have the capacity to eliminate the bottlenecks on H-1.

Respectfully,

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RECORD # 254 DETAILS

Status : Initial Action Needed
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Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue : DEIS should
compare environmental impacts between Rail and Managed Lane
Alternative

Discussion:
DEIS pg. 4-1 states "In this document, the No Build Alternative serves as
an environmental baseline to which the impacts of other alternatives are
compared." The DEIS and AA should compare environmental impacts
between Rail and Managed Lane Alternative as follows:

A comparison of Managed Lane Alternative versus Rail:

Cost:
Rail - \$6.0 + Billion
Managed Lane - Less than \$1.0 Billion (Similar length Tampa reversible
three lane elevated expressway cost \$320 million in year 2005)

Length of new elevated fixed guideway:

Rail - 28 miles. Kapolei, Farrington Hwy to Waipahu, Kamehameha Hwy
to
Aiea, Salt Lake Blvd, Mapunapuna, Dillingham, Nimitz, Halekauwila,
Kapiolani, Kona (Ala Moana Shopping Center), Kapiolani, Kalakaua,
Kuhio (Waikiki); Kapiolani,
University Ave. (U.H. Manoa).

Managed Lane - 11 Miles. Over Kam Hwy median (H-1/H-2 Merge to
Pearl Harbor), alongside (mauka) H-1 Viaduct to Keehi Lagoon, over
Nimitz hwy to Iwilei thence to Hotel
Street and underpass to Alakea St and Halekauwila Street. Use King
and Beretania (couplet) on grade.

Traffic congestion:

Rail – Alternative Analysis Table 3-12 shows 17,500 vph on H-1 (full
rated capacity =9,500 vph) at Kalauao. Rail will worsen traffic
congestion on H-1. 9,600 commuters per hour will be stuck in gridlock
on H-1 during am peak hour or delayed in catching mostly fully loaded
train cars at train stations.

Managed Lane - Will reduce congestion on H-1 by 35 percent and has
the traffic capacity to eliminate
H-1 bottlenecks at Pearl City and at Middle St. merge..

Stations:

Rail - Will have 34 four-story or higher rail stations
Managed Lane - Zero bus stations.

Rail Stops:

Rail - Minimum 19 rail stops outside of Honolulu.
Managed Lane - Zero bus stops between community transit center and Honolulu

Transfers:

Rail - At least two transfers, home to bus to rail to another bus in town)
Managed Lane - None. Bus will travel directly from community to destination.

Travel time:

Rail - will not reduce travel time due to required transfers (bus to rail to bus).
Managed Lane - reduce travel time by 34 percent in automobile and bus travel times along the Leeward Corridor from current levels.

Bypass Road

Rail - Railway not available for highway bypass due to accident on H-1
Managed Lane - Reversible highway available 24/7.

Land Acquisition

Rail - Much acquisition needed for Rail stations, vehicular parking lots and rail yards.
Managed Lane - Land required for busyard in Kapolei.

Funding

Rail - GET taxes plus property tax . Fed fund unlikely because Feds recently cut rail funds for Wash. DC to Dulles Airport.
Managed Lane - funded by Feds FHWA, FTA and municipal bonds. GET funds could be made available with change in law.

Visual Blight

Rail - Will be an 28 mile elevated environmental blight on Honolulu. Elevated tracks will be ugly, running through downtown and eventually Waikiki, defacing our beautiful city and damaging our tourist industry.
Managed Lane – 11 mile elevated outside of Honolulu only.

Air pollution

Rail is not Green. Rail uses more energy per passenger mile than our buses or cars. Trains will continue at 10 minute schedule during non-peak hours with few passengers. Rail will not eliminate H-1 bottlenecks at Pearl City which will cause 8000 vehicles per hour stuck in gridlock on H-1 resulting in greater pollution than MLA.
Managed Lane – Has capacity to eliminate H-1 bottlenecks thereby reducing air pollution relative to rail.

Travel Speed

Rail - is slow, averaging 25 mph with 19 rail stops outside of Honolulu. There are no express trains.

Managed Lane – Non-stop 55 mph travel between each community and job destinations from Pearl Harbor and downtown .

Conclusion: If the DEIS Rail alternatives are compared with the other transit alternatives including Managed Lanes, EzWay, BRT, and bypass highways, each rail alternative would be inferior to the “other” transit alternatives, both in terms of cost effectiveness and for providing traffic relief.

Recommendation: The DEIS should include cost effective transit systems which will have the capacity to eliminate H-1 congestion include Managed Lane Alternative, BRT, EzWay or two highway bypasses around the H-1 bottlenecks at Pearl City and at Middle Street merge. These alternatives can then be compared with the rail alternatives to arrive at a more logical preferred alternative.

Respectfully,

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RECORD # 255 DETAILS

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Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue : False and misleading DEIS statement to Improve Transportation Equity

Discussion:

Para. 1.8.4, pg. 1-21 states that "Equity is about fair distribution of resources so that no group carries an unfair burden of the negative environmental, social or economic impacts or receives an unfair share of benefits. Many low-income and minority workers who commute to work in the PUC Development Plan area live in the corridor outside of the urban core and thus rely heavily on transit availability. As more roadways become more congested... because of traffic accidents or heavy rain..... a need exists to provide a more reliable transit system."

Discussion:

A fully-elevated, steel-wheel on steel rail transit system can move only 6,000 commuters (4000 standees, 2000 seated) per hour during peak travel periods while the 2030 commuter demand for RAIL will reach 15,600 commuters per hour, according to Table 3-12 of the Alternative Analysis.

Train commuter demand of 15,600 commuters per hour in year 2030 is calculated thus:
City AA, Table 3-12 shows year 2030 forecast volume of 17,500 vph on H-1 (full rated capacity = 9,500 vph) with the rail built and operating. Therefore, there is a commuter overload on H-1 Freeway of 8,000 vph = 9,600 commuters per hour. The total commuter load in 2030 = H-1 commuter overload plus 6,000 commuters on the Rail = 15,600 commuters per hour during peak.

The EzWay or Managed Lane alternatives each has the capacity to accommodate the total yr 2030 demand. The Managed Lanes or EzWay will each have elevated, reversible, three lanes each lane has a capacity of 2000 vph. For three lanes, the vehicular capacity is 6000 vehicles per hour. The Managed Lane Alternative person capacity is calculated thus:

Projected use of the HOT during peak hour includes:
200 express buses w/~50 pns = 10,000 pns
500 HOV5 (carpool) = 2,500 pns
500 vanpool (~5pns) = 2,500 pns.

Remaining excess capacity available for low occupancy green vehicles:
6,000 vph minus (200 + 500 + 500) = 4,800 vph. 4,800 low occupancy vehicles

Average persons per vehicle = 1.2 pns per vehicle

4,800 vehicles with 1.2 pns = 5700 pns

Summary: Managed Lane persons capacity = 10,000 + 2,500 + 2,500 + 5,700 = ~ 20,700 pns

Conclusion:

There will be 9,600 + 6,000 = 15,600 commuters per hour that must get on the train during peak travel period. However, 9,600 commuters per hour will NOT be able to board the train because the train has insufficient commuter capacity during peak travel period. Therefore, the train cannot be considered as a form transit which provides transportation equity to many low-income and minority workers who commute to work in the PUC Development Plan area. Rail will impose an environmental injustice to low-income and minority commuters.

Recommendation: Rail Transit should be eliminated as the preferred alternative because it does not meet the test of improving transportation equity. The DEIS should include cost effective transit systems which will have the capacity to eliminate H-1 congestion include Managed Lane Alternative, BRT, EzWay or two highway bypasses around the H-1 bottlenecks at Pearl City and at Middle Street merge. These alternatives can then be compared with the rail alternatives to arrive at a more logical preferred alternative.

Respectfully,

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Submission Content/Notes : 29 December, 2008

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Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue : DEIS should
compare environmental baselines between Rail and other low-cost
transit alternatives such as Managed Lanes, BRT, Ezway and No-build

Discussion:

DEIS pg. 4-1 states "In this document, the No Build Alternative serves as an environmental baseline to which the impacts of other alternatives are compared."

The DEIS contains only rail alternatives and a "No-build" alternative which draws wrong or biased conclusions with respect to the environment. There are other low-cost alternatives considered superior in providing traffic relief and cost which were wrongfully deleted or not included in the DEIS and Alternative Analysis.

Other cost effective transit alternatives include a) an 11 mile elevated three-lane reversible Managed Lane, b) a 15 Mile elevated, three-lane reversible EzWay, c) a BRT fixed Guideway and d) two elevated, three-lane, reversible highway bypasses around the bottlenecks at Pearl City and at Middle Street Merge. Each of these alternatives would cost less no more than \$1.2 Billion and each has the traffic capacity to eliminate the H-1 bottlenecks at Pearl City and at Middle Street Merge.

Conversely, each of the steel wheel fixed guideway alternatives included in the DEIS cost no less than \$6.28 Billion (Table 6-2 DEIS). Moreover, after the \$6.28 Billion Rail is built and operating, traffic congestion on H-1 will worsen as shown on table 3-12 of the Alternative Analysis and on DEIS Table 3-20. The AA year 2030 shows 17,500 vehicles per hour on the H-1 freeway (rated full capacity = 9,500 vph). The DEIS yr 2030 Table 3-20 shows there will be 4,200 vph above the vehicle capacity of the highway facilities heading Koko Head bound during the morning peak period.

Conclusion: If the DEIS Rail alternatives are compared with the other transit alternatives including Managed Lanes, EzWay, BRT, or two Flyovers, each steel wheel fixed guideway alternative would be totally inferior, both in terms of cost effectiveness and for providing traffic relief.

Recommendation: Include a wide range of alternatives as required by law. The DEIS should include cost effective transit systems which will

have the capacity to eliminate H-1 congestion include Managed Lane Alternative, BRT, EzWay or two highway bypasses around the H-1 bottlenecks at Pearl City and at Middle Street merge. These alternatives can then be compared with the rail alternatives to arrive at a more logical preferred alternative.

Respectfully,

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FOIA Response Date :

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Draft EIS Comment

RECORD # 257 DETAILS

Status : Initial Action Needed
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Submission Method : Website
Other Submission Method :
Submission Date : 12/29/2008

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
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FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue : DEIS traffic
analysis provides incomplete information resulting in arriving at wrong
DEIS findings

Fact:
DEIS Table 3-20 provides existing traffic volumes but does not provide
forecasted volumes with resultant Level of Service (LOS) for each
specific highway.

Discussion:
DEIS Table 3-20 lists a general "facility" highway serving each
transportation corridor. This does not provide sufficient information to
determine which specific highway will continue to have congestion after
the transit alternative is completed and operating. Each "facility" should
be broken down further, i.e. "Kalauao Koko Head bound " should include
H-1 Fwy, H-1 Fwy (HOV), H-1 Fwy (Zipper), Moanalua, Kamehameha
Hwy with appropriate traffic volumes, present and forecast, and Level of
Service for each transit alternative.

The 2006 Alternative Analysis and DEIS show that congestion on H-1 at
Kalauao Kokohead bound and at Kapalama Canal will continue to be at
Level of Service "F" after the steel wheel fixed alternative is built and
operating. Despite this continued congestion, the Alternative Analysis,
and the DEIS accepts, that the steel wheel fixed guideway is the
recommended alternative. This conclusion is totally in error because
both the AA and DEIS do not sufficiently provide traffic volumes, level of
service and specific highways to arrive at a reasonable conclusion. The
fact that rail will worsen congestion alone is enough to disqualify rail as
the preferred transit alternative.

The City Alternative Analysis, Table 3-12, shows that there will still be
17,500 vehicles per hour in 2030 on the H-1 (full rated capacity = 9,500
vehicles per hour) at Pearl City AFTER the \$7.0 Billion Rail is built and
operating.

The DEIS Screenline Volumes for the 2030 Salt Lake Build Alternative
Table 3-20, shows that with the Salt Lake Build Alternative AT Screen
line "D" :
- Kalauao Koko Head bound : Observed (forecast) Volume - AM Peak =
18,910 vehicles per hour (vph).
- Facility 2030 Capacity - AM Peak = 14, 650 vph - Reference: Table 3-

12 Alternative Analysis.

Result: There will be 4,260 vph above the facility capacity (H-1 + HOV + Zipper + Kam+ Moanalua) at Kalauao which indicates a Level of Service (LOS) F AFTER the Salt Lake Rail is built. This conclusion is consistent with the conclusion using the numbers from the City's Alternative analysis report. With rail, the above numbers show congestion will WORSEN after the \$7.0 Billion full build-out Rail is completed.

Conclusion: The DEIS traffic analysis provides incomplete information resulting in arriving at wrong conclusions. Specifically, the detailed Alternative Analysis Table 3-12 and DEIS Table 3-20 show that a rail alternative "worsens" traffic congestion on most highways which rejects the findings that Rail will "improve mobility, reliability, equity and reduced travel times.

Recommendation: 1) Revise DEIS Table 3-20 and other appropriate tables and narrative to include the three-lane reversible MLA, the three-lane EzWay, BRT and two separate Flyovers over Kamehameha Highway and Nimitz Highway and 2) Provide a higher level of detailed analysis which will be similar or better than that provided in the Alternative Analysis Table 3-12.

Respectfully,

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Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
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FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue: DEIS Summary
of findings on Transportation Conditions and Effects is incorrect

Fact:
DEIS Summary of findings on Transportation Conditions and Effects,
page 3-53, are not consistent with Table 3-20 which indicate that with
rail built and operating, traffic congestion on H-1 and other highways will
WORSEN.

Discussion:
The summary on existing conditions states, inter alia, that:
- "increasing traffic congestion and constrained transit operating
conditions have reduced system reliability and mobility for all travelers."
- Reliability of transit has worsened... Reliability is at level of service "F".
The summary on Effects of the "Build Alternatives" state that transit
service mobility, reliability, equity and access to new development would
improve (if rail is built)." This summary is totally false because the 2006
Alternative Analysis Table 3-12 and DEIS Table 3-20 show that Rail
Transit, if built, will result in WORSE traffic congestion on H-1 and other
highways to level of service "F" in year 2030.

The City Alternative Analysis, Table 3-12, shows that there will still be
17,500 vehicles per hour in 2030 on the H-1 (full rated capacity = 9,500
vehicles per hour) at Pearl City AFTER the \$6.0 Billion Rail is built and
operating.

Result: There will be an 8,000 vph overload on H-1 after Rail is built
which will worsen traffic congestion on H-1 resulting in a level of service
"F".

The DEIS Screenline Volumes for the 2030 Salt Lake Build Alternative
Table 3-20, shows that with the Salt Lake Build Alternative AT Screen
line "D" :
- Kalauao Koko Head bound : Observed (forecast) Volume - AM Peak =
18,910 vehicles per hour (vph).
- Facility 2030 Capacity - AM Peak = 14, 650 vph - Reference: Table 3-
12 Alternative Analysis.
Result: There will be 4,260 vph above the facility capacity (H-1 + HOV +
Zipper + Kam+ Moanalua) at Kalauao which indicates a Level of Service
(LOS) F AFTER the Salt Lake Rail is built. This conclusion is consistent
with the conclusion using the numbers from the City's Alternative

analysis report. With rail, the above numbers show congestion will WORSEN after the \$6.0 Billion full build-out Rail is completed.

The above discussion refutes the DEIS statement that the "Effects of the Build alternatives" will: Improve service mobility, reliability, equity, and access to new development; improve travel times, and improve operating efficiency because after the \$6.0 Billion Rail is built, congestion on H-1 and other highways will WORSEN.

Conclusion: The DEIS Table 3-20 and AA Table 3-12 show that traffic on H-1 and other highways will result in worse traffic congestion in year 2030 AFTER Rail is built and therefore rejects the summary finding that Rail will "improve mobility, reliability, equity and reduced travel times.

Recommendation: It is recommended that :

- 1) Revise the summary of findings on Transportation Conditions and Effects to be consistent with the finding that Rail will NOT improve mobility, reliability, equity and access to new development,
- 2) Revise DEIS Table 3-20 and other appropriate tables and narrative to: indicate that Traffic on H-1 will worsen and provide a higher level of detailed analysis which will be similar to that provided in the Alternative Analysis Table 3-12,
- 3) state that traffic with rail will have a net result of worse traffic congestion on H-1 at the H-1/H-2 merge and at the Middle Street merge and
- 4) include in the DEIS other cost-effective transit alternatives such as an 11-mile three-lane reversible MLA for evaluation and comparison with the No Build alternative and the rail alternatives.

Respectfully,

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Reply Requested :

Yes

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RECORD # 259 DETAILS

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To:
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Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue: DEIS traffic
analysis provides incomplete information

Fact:
DEIS Table 3-12 shows existing and 2030 traffic volumes for No Build
Alternative

DEIS Table 3-20 provides forecasted traffic volumes but do not show
resultant Level of Service (LOS) for each highway (facility) Corridor.

Discussion:
DEIS Table 1-3 and Table 3-20 are incomplete because a) lane
designations are too generalized, b) each highway lacks level of service
information, and c) lacks sufficient non-rail alternatives, i.e. Managed
Lane, BRT, EzWay.

Specific Highway and lane designations should be specific. "Facility"
highways serving each transportation corridor should be broken down
further, i.e. "Kalauao Koko Head bound " should be broken down into H-
1 Fwy, H-1 Hwy (HOV), H-1 Fwy (Zipper), Moanalua, Kamehameha Hwy
with appropriate traffic volumes, present and forecast, and Level of
Service for each transit alternative.

The 2006 Alternative Analysis and DEIS concludes that Rail transit will
"help reduce congestion" which is very misleading because while rail will
HELP in reducing future congestion, the NET future traffic congestion
on H-1 will substantially INCREASE, primarily because rail will not have
the commuter capacity to transport the net future commuter demand in
year 2030. For example, the City Alternative Analysis, Table 3-12,
shows that there will still be 17,500 vehicles per hour in 2030 on the H-1
(full rated capacity = 9,500 vehicles per hour) at Pearl City AFTER the
\$6.0 Billion Rail is built and operating.

The DEIS Screenline Volumes for the 2030 Salt Lake Build Alternative
Table 3-20, shows that with the Salt Lake Build Alternative AT Screen
line "D" :
- Kalauao Koko Head bound : Observed (forecast) Volume - AM Peak =
18,910 vehicles per hour (vph).
- Facility 2030 Capacity - AM Peak = 14, 650 vph - Reference: Table 3-
12 Alternative Analysis.

Result: Results from DEIS Table 3-20 show that there will be 4,260 vph above the facility capacity (H-1 + HOV + Zipper + Kam+ Moanalua) at Kalauao which indicates a Level of Service (LOS) F AFTER the Salt Lake Rail is built. This conclusion is consistent with the conclusion using the numbers from the City's Alternative analysis report. With rail, the above numbers show congestion will WORSEN after the \$6.0 Billion full build-out Rail is completed. Therefore, the DEIS Table 3-20 showing a positive change in congestion is MISLEADING because the NET change in traffic congestion will WORSEN.

For example, the forecasted volume for Kalauao Koko Head bound A.M. Peak Hour is 18,910 vph while the rated full capacity of the "facility" is 14,650 vph (reference: AA table 3-12 for facility including H-1 Fwy, H-1 Hwy (HOV), H-1 Fwy (Zipper), Moanalua, Kamehameha Hwy . There will be 4,260 vehicles per hour above the facility rated capacity resulting in a LOS "F". This would contradict the findings on DEIS page 3-53 where mobility, reliability and equity would DECREASE rather than increase.

This makes it all the more reason to include a an 11- mile, elevated, three lane reversible Managed Lane Alternative, a transit system which is lower in cost than rail and will have the capacity to eliminate the LOF "F" on the H-1 freeway.

Conclusion: The DEIS traffic analysis provides incomplete information resulting in arriving at wrong conclusions. Specifically, the detailed Alternative Analysis Table 3-12 and DEIS Table 3-20 show "net result" that a rail alternative "worsens" traffic congestion on most highways which rejects the findings that Rail will "improve mobility, reliability, equity and reduced travel times.

Recommendation: It is recommended that 1) the DEIS Table 3-20 and other appropriate tables and narrative be revised to indicate that Traffic on H-1 will worsen , provide a higher level of detailed analysis which will be similar to that provided in the Alternative Analysis Table 3-12, 2) state that traffic with rail will have a net result of worse traffic congestion on H-1 at the H-1/H-2 merge and at the Middle Street merge and 3) that other low cost-effective transit alternatives be included in the DEIS for evaluation and comparison with the No Build alternative and the rail alternatives.

Respectfully,

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Reply Requested :
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FOIA Referral Date :
FOIA Response Date :

Yes
Draft EIS Comment

RECORD # 260 DETAILS

Status : Initial Action Needed
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Submission Content/Notes : 29 December, 2008

To:
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Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project",
Issue: DEIS traffic analysis on Air Quality is incomplete

Fact:
DEIS paragraph 4.8.1 methodology states "Air Quality effects predicted to result from the Project's operation are based on the anticipated vehicle miles traveled (VMT) and average network speed for each alternative."

Discussion:

1) City AA, Table 3-12 shows year 2030 forecast volume of 17,500 vph on H-1 (full rated capacity = 9,500 vph) after the Rail is built and operating. Therefore, there is a commuter overload on H-1 Freeway of 8,000 vph.

Result: There will be an 8,000 vph overload on H-1 after Rail is built which will worsen traffic congestion on H-1 resulting in a level of service "F". These 8,000 vehicles will cause major pollution because the Train cannot carry the full commuter demand for yr 2030. = 9,600 commuters per hour.

2) The DEIS Screenline Volumes for the 2030 Salt Lake Build Alternative Table 3-20, shows that with the Salt Lake Build Alternative AT Screen line "D" :

- Kalauao Koko Head bound: Observed (forecast) Volume - AM Peak = 18,910 vehicles per hour (vph).
- Facility 2030 Capacity - AM Peak = 14,650 vph - Reference: Table 3-12 Alternative Analysis.

Result: There will be 4,260 vph above the facility capacity (H-1 + HOV + Zipper + Kam Hwy + Moanalua) at Kalauao which indicates a Level of Service (LOS) F AFTER the Salt Lake Rail is built. These 4,260 vehicles will cause major pollution because the Train cannot carry the full commuter demand for yr 2030.

Both AA Table 3-12 and DEIS Table 3-20 show that traffic congestion on H-1 will WORSEN after the \$6.0 Billion Rail is built and operating.

DEIS Table 4-12, 2030 Regional Pollutant Burdens, do not include the pollutants discharged by 8,000 vehicles per hour (equivalent 9,600 commuters per hour) per the AA or 4,260 vph per the DEIS which will

be gridlocked on H-1 Freeway because the low-capacity train cannot accommodate the 2030 commuter demand.

A three lane Managed Lane reversible will substantially eliminate traffic overload on H-1 during peak travel periods thus:

- Numbers from Table 3-12 of city 2006 Nov Alternative Analysis (\$10 million report):
- Rail only: capacity = 6000 commuters per peak hour (equivalent 5000 vehicles per peak hour.)
- H-1 only: rated capacity = 9,500 vehicles per hour (equivalent 15,400 commuters per hour)
- H-1 forecast yr 2030 traffic load = 17,500 vehicles per hour per City AA Table 3-12 (or 8,000 vph overload = 9,600 commuters per hour)

Managed Lane three-Lane HOV Reversible Flyover: capacity = 6,000 high occupancy vehicles per hour (equivalent 21,600 commuters per hour). Capacity based on HOV use on Flyover by 200 express buses per peak hour, car pools, van pools, green cars and HOV2. (50 pns per express bus and 5800 vph at avge 2 pns per vehicle).

Year 2030 commuter load by City AA Report = Rail (6000) + H-1 overload (9,600) + H-1 capacity (15,400) = 31,000 commuters.

2030 Load = 31,000 commuters per hour
Rail + H-1 = 21,400 commuters per hour
Managed Lane HOV + H-1 = 37,000 commuters per hour

Finding: Rail does not have sufficient commuter capacity which will cause 9,600 commuters to be stuck in gridlock on H-1 or stuck at rail stations (especially at stations between Waipahu and Kalihi). Managed Lane HOV Alternative will eliminate congestion and bottlenecks on H-1.

Conclusion:

DEIS Pollutant conclusions on Table 4-12 for the Airport and Salt Lake alternatives are incorrect because they do not include pollutants discharged by the additional 8,000 (4,260) vehicles per hour gridlocked on H-1 according to Table 3-12 of the AA and Table 3-20 of the DEIS.

Recommendation: Revise the DEIS findings regarding Pollutant Burdens based on inclusion of the 8,000vph (or 4,260 vph) "overload on H-1" during peak periods.

Respectfully,

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RECORD # 261 DETAILS

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To:
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650 South King St. 3rd Floor
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Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue: DEIS provides misleading information on Managed Lane Alternative (MLA)

Fact:

DEIS page 2-5, paragraph 4, states "The Managed Lane Alternative would have generated the greatest amount of air pollution, required the greatest amount of energy for transportation..."

Discussion:

1) Table 3-12 of the Alternative Analysis, a.m. peak hour Screenline Volume at Kalauao, shows that traffic volume on H-1 (full rated capacity 9,500 vph) rises from the current 11,000 vph to 17,400 vph in 2030 after the \$6.0 Billion Rail is built and operating. Conclusion: After expenditure of \$6.0 Billion for rail, traffic overload on H-1 will increase from 1,500 vph to nearly 8,000 vph and will not eliminate the traffic bottlenecks at the H-1/H-2 merge and at the Middle Street merge.

2) The three-lane MLA has the capacity to eliminate the two major H-1 bottlenecks:

From Table 3-12 of city 2006 Nov Alternative Analysis:

- Rail only: capacity = 6000 commuters per peak hour (equivalent 5000 vehicles per peak hour.)
- H-1 only: rated capacity = 9,500 vehicles per hour (equivalent 15,400 commuters per hour)
- H-1 forecast yr 2030 traffic load = 17,500 vehicles per hour per City AA Table 3-12 (or 8,000 vph overload = 9,600 commuters per hour)

- Managed Lane three-Lane HOV Reversible Flyover: capacity = 6,000 high occupancy vehicles per hour (equivalent 21,600 commuters per hour). Capacity based on HOV use on Flyover by 200 express buses per peak hour, car pools, van pools, green cars and HOV2. (50 pns per express bus and 5800 vph at avge two persons per vehicle).

- Year 2030 commuter load by City AA Report = Rail (6000) + H-1 overload (9,600) + H-1 capacity (15,400) = 31,000 commuters.

2030 Load = 31,000 commuters per hour

Rail + H-1 = 21,400 commuters per hour

Managed Lane HOV + H-1 = 37,000 commuters per hour

Based on above calculations, rail does not have sufficient commuter capacity which will cause 9,600 commuters to be stuck in gridlock on H-1 or stuck at rail stations (especially at stations between Waipahu and

Kalihi). Managed Lane HOV Alternative will eliminate congestion and bottlenecks on H-1.

3) Rail will result in causing 17,400 vph to be stuck in gridlock on H-1 and will thus cause more pollution and more gas used by commuters. Conversely, the MLA will eliminate traffic gridlock on H-1, create more efficient commuter travel and will therefore cause less pollution and energy use than rail transit.

Recommendation:

It is recommended that the DEIS be revised throughout to indicate that the MLA causes less pollution and energy use than rail transit and that the Managed Lane Alternative be reinstated into the DEIS for further consideration as the locally preferred alternative.

Respectfully,

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Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue: DEIS traffic
analysis shows traffic Congestion could cost Oahu jobs

Fact:

. The City Alternative Analysis, Table 3-12, shows that there will still be
17,500 vehicles per hour in 2030 on the H-1 (full rated capacity = 9,500
vehicles per hour) at Pearl City AFTER the \$7.0 Billion Rail is built and
operating.

Result: With rail, the above numbers show congestion will WORSEN
after the \$6.2 Billion Minimum operable Segment Rail is completed.

The DEIS Screenline Volumes for the 2030 Salt Lake Build Alternative
Table 3-20, shows that with the Salt Lake Build Alternative at Screen
line "D" :

- Kalauao Koko Head bound : Observed (forecast) Volume - AM Peak =
18,910 vehicles per hour (vph).
- Facility 2030 Capacity - AM Peak = 14, 650 vph - Reference: Table 3-
12 Alternative Analysis.

Result: There will be 4,260 vph above the facility capacity (H-1 + HOV +
Zipper + Kam+ Moanalua) at Kalauao which indicates a Level of Service
(LOS) F AFTER the Salt Lake Rail is built. This conclusion is consistent
with the conclusion using the numbers from the City's Alternative
analysis report. With rail, the above numbers show congestion will
WORSEN after the \$7.0 Billion full build-out Rail is completed.

Discussion:

Traffic congestion could cost state jobs. See
http://www.ajc.com:80/metro/content/metro/stories/2008/11/13/transportation_study_traffic_economy.html

"Transportation woes could cost Georgia 320,000 potential jobs and
\$515 billion in economic benefits over the next 20 years if the state
sticks to "continued traffic congestion or business as usual," according to
a new state report. Traffic jams and the lack of access to reliable
transportation in metro Atlanta will increasingly limit the number of jobs
people can commute to, and the number of potential workers an
employer can expect to attract, according to the study presented to the
state Transportation Board."

Rail will worsen traffic congestion according to City and County of
Honolulu DEIS Table 3-20 and AA table 3-12.

Conclusion: The traffic analysis included in the detailed Alternative

Analysis Table 3-12 and DEIS Table 3-20 show that a rail alternative "worsens" traffic congestion on most highways which could cost Oahu jobs.

Recommendation: Include additional cost-effective mass transit alternatives which will substantially reduce or eliminate traffic congestion in the West Oahu Traffic Corridor. These alternatives include BRT, 11 mile three-lane Managed Lane, elevated three-lane, 15 mile EzWay and two highway bypasses around the bottlenecks at Pearl City and at Middle street. Each of these alternatives are estimated to cost less than \$1.2 Billion, much less than the \$6.2 Billion Rail Alternatives which will worsen traffic congestion.

Respectfully,

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City and County of Honolulu
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Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue- Project
Construction Phasing will not provide early traffic relief

Fact:
The rail project construction phasing is proposed in four phases as
discussed on DEIS page 2-38 and as shown on Figure 2-44 as follows:

- East Kapolei to Pearl Highlands (First Construction Phase)
- Pearl Highlands to Aloha Stadium (Second Construction Phase)
- Aloha Stadium to Middle Street (Third Construction Phase)
- Middle Street to Ala Moana Shopping Center (Fourth and final
Construction Phase)

Discussion:

The primary purpose of any mass transit system is to provide traffic relief
and to provide relief in the near term. The major West and Central Oahu
traffic bottlenecks are at the Middle Street merge and at the H-1/H2
merge. Construction phases for the rail should be prioritized to reduce
the traffic bottlenecks at these two locations. Therefore, the project
construction phasing shown above should be reversed:

- Middle Street to Ala Moana Shopping Center (First Construction
Phase)
- Aloha Stadium to Middle Street (Second Construction Phase)
- Pearl Highlands to Aloha Stadium (Third Construction Phase)
- East Kapolei to Pearl Highlands (Fourth Construction Phase)

This revised project phasing is logical because:

- a) The Middle Street to Ala Moana Shopping Center first phase will
provide early traffic relief to the Middle Street bottle neck.
- b) The funding source for the entire 20 mile segment is not guaranteed,
recognizing that the General Excise Tax is not meeting projections in
revenue due to the expected long term slumping economy. The
taxpayer will not tolerate any increase in property tax or GET to fund any
rail fund shortfall.
- c) The funding amount from the Federal Transit Authority is not
guaranteed.
- d) If rail funds are delayed, providing traffic relief to the traffic
bottlenecks on H-1 will be delayed.

e) Each phase for rail will provide the maximum bang for the dollar. The rail will be completely useable and serve the most number of commuters as each phase is completed. Conversely, the Kapolei to Pearl Highlands would serve very few commuters as most commuters will be destined for east of Pearl Harbor and beyond in the easterly direction.

Vehicle Maintenance and Storage Facility for each construction phase can be temporarily established to support each construction phase as modified:

- a) For the Middle Street phase, some 40 acres could be obtained along Lagoon Drive to include portions of Keehi Lagoon Park, Airport vacant areas and commercial businesses including Used Car Lots. At least 10 acres for park and ride can be acquired in the airport area alongside Aolele Street and Lagoon Drive.
- b) For the Aloha Stadium phase, portions of the Aloha Stadium Parking lot can be temporarily used for the Storage Facility and temp facilities for vehicle maintenance.
- c) For the Pearl Highlands Phase, a 43-acre vacant site near Leeward Community College is available (DEIS figure 2-42).
- d) A 41-acre site is identified for the Kapolei phase (DEIS figure 2-41).

Conclusion:

Construction of the Middle Street to Ala Moana Phase as a first priority is consistent with providing near-term traffic relief, will initially serve the most number of commuters, will be completely useable and cost effective, and will not force the taxpayer to pay more taxes to fund additional rail segments should rail funding sources not achieve revenue projections.

Recommendation:

The DEIS should reverse the construction project phasing as discussed above starting with the Middle Street to Ala Moana Shopping Center as the First Phase.

Respectfully,

Ben Ramelb P.E.
1148 Ala Liliko'i St
Honolulu, HI
96818

Copy to:

1) Mr. Ted Matley
FTA Region IX
201 Mission St. Suite 1650
San Francisco, CA 94105
FAX 415-744-2726

2) Governor Linda Lingle
Hawaii State Capitol
415 S Beretania St. 5th Floor
Honolulu, HI 96813

FAX (808) 586-0006

3) Honolulu City Council Members
FAX (808) 867-5011

Reply Requested :
Submission Type :
**FOIA (Freedom of
Information Request)
Request :**
FOIA Referral Date :
FOIA Response Date :

Yes
Draft EIS Comment

RECORD # 264 DETAILS

Status : Initial Action Needed
Creation Date : 12/29/2008
Creator Affiliation :
First Name : Ben
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Business/Organization : Retired Civil Engineer
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Apt./Suite No. :
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State : HI
Zip Code : 96818
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Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/29/2008

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue: Displacement of
Homes and Churches should be minimized

Fact:
The DEIS Table 2-6 and Figure 2-20 shows the park and ride facility at
Pearl Highlands to be 11 acres and 1600 vehicular parking spaces. The
11 acres "Banana Patch" contain several family homes, farmland and
church facilities which have been in existence for 30 to 60 years.

Discussion:
It would be considered an environmental injustice to displace the many
families on the 11 acre property because there are better alternatives to
the 11 acre Park-and-Ride facility.

Figure 2-42 shows a 43-acre vacant adjacent to the Leeward
Community College (LCC site). The DEIS states that this 43 acre LCC
site is reserved for potential use for a Vehicle Maintenance and Storage
Area (VMSA). Since only one VMSA is needed for the rail project, there
are three alternative sites for the VMSA:

- 1) At the Honolulu Airport east end, some 40 acres could be acquired
along Lagoon Drive and Aolele Street to include portions of Keehi
Lagoon Park, Airport vacant areas and commercial businesses including
Budget Car Rental
- 2) Portions of the Aloha Stadium Parking lot can be used for the VMSA.
Multi-story vehicular parking structures could be built to accommodate
the loss in sports events parking.
- 3) A 41-acre site for VMSA is identified in Kapolei (DEIS figure 2-41).

A further alternative is to reduce the size of the VMSA at the 43-acre
LCC site by splitting the VMSA facility between the LCC site and one of
the other alternative sites mentioned above.. This area reduction will
allow the reservation of 10 to 15 acres for a park and ride facility on the
LCC site.

The best alternative is to dedicate the entire vacant 43-acre LCC site for
a 23-acre Transit Oriented Development (TOD) and a 20-acre Park-
and-ride facility for 3,000 vehicles for rail commuters.

Conclusion:

- a) The use of the LCC site for Park and Ride instead of the 11-acre "Banana Patch " site will eliminate the need to displace several families, farm land and church facilities.
- b) There are alternative sites for VMSA facilities other than the LCC site.
- c) The LCC site provides a greater amount of parking spaces for rail commuters.

Recommendation:

It is recommended that the LCC site be used for a 23-acre Transit Oriented Development (TOD) and a 20-acre Park-and-ride facility for 3,000 vehicles for rail commuters.

Respectfully,

Ben Ramelb P.E.
1148 Ala Liliko'i St
Honolulu, HI
96818

Copy to:

Mr. Ted Matley
FTA Region IX
201 Mission St. Suite 1650
San Francisco, CA 94105
FAX 415-744-2726

Governor Linda Lingle
Hawaii State Capitol
415 S Beretania St. 5th Floor
Honolulu, HI 96813
FAX (808) 586-0006

Honolulu City Council Members
FAX (808) 867-5011

Yes

Draft EIS Comment

Reply Requested :
Submission Type :
**FOIA (Freedom of
Information Request)
Request :**
FOIA Referral Date :
FOIA Response Date :

RECORD # 265 DETAILS

Status : Initial Action Needed
Creation Date : 12/29/2008
Creator Affiliation :
First Name : Thomas
Last Name : Miguel
Business/Organization : PHNSY & IMF
Address : 667 Safeguard St.
Alternative Preference :
Apt./Suite No. :
City : Pearl Harbor
State : HI
Zip Code : 96782
Email : thomas.miguel@navy.mil
Telephone : 4738000
Telephone Extension : 6137
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 12/29/2008
Submission Content/Notes : To whom it may concern, I was a IBEW steward in PHNSY and approximately four years ago I was part of a team to negotiate for all Shipyard workers to obtain a free Bus pass. Originally shipyards were required to pay \$17 to be able to get a monthly Bus pass, but today we receive a free Bus pass due to the Union negotiation and the DOT paying for Federal workers public transportation. Today we have 800+ Bus riders and 800+ Van Pool users all paid by DOT. Unfortunately our numbers would increase if we had a system like the Rapid Transit that comes to Pearl Harbor at various times through out the day. Presently we only have buses running at the start of our work day (0630 hours) and at the end (1500 hours) and they only service six areas. We feel that if the Rapid Transit does come close to Pearl Harbor the ridership will go up and many more workers at Pearl would take advantage of the free passes. This must happen to help make Rapid Transit become a success. Mahalo Tommy Miguel
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 270 DETAILS

Status : Initial Action Needed
Creation Date : 12/31/2008
Creator Affiliation :
First Name : Hurshae
Last Name : Summons
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Address : po box 1090
Alternative Preference :
Apt./Suite No. :
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State : HI
Zip Code : 96782
Email : Schaesan@hotmail.com
Telephone : 808-4283549
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 12/31/2008
Submission Content/Notes : I thought about it for quite some time and considered input from friends, neighbors, and strangers. This project should have been started years ago. There remains a problem, the route is impractical, it should be changed before time and money are wasted. Thousands of commuters travel from areas like Waianae and Kahuku travel as far a Honolulu to work. The routes should at least start in these locations and end a practical transit area outside of Honolulu where a major "Bus" depot is. Another idea is to connect Ewa Beach to Honolulu.(build a &#x26;#x26; bridge) If national security is an issue then at least ask the Government. All they can say is no.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 271 DETAILS

Status : Initial Action Needed
Creation Date : 1/1/2009
Creator Affiliation :
First Name : Christopher
Last Name : Mapa
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Alternative Preference :
Apt./Suite No. :
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Zip Code : 96706
Email : mapa.christopher@gmail.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 01/01/2009
Submission Content/Notes : I have another question. Since most other train require operators, have there been requirements put into place for becoming a train operator for the new Hawaii Rail System.

From what I learned, individuals have to be at least 21 years of age to apply as a train operator, and hold a class C license. Is that true for Hawaii as well?

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 272 DETAILS

Status : Initial Action Needed
Creation Date : 1/2/2009
Creator Affiliation :
First Name :
Last Name :
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96816
Email : jhm245@yahoo.com
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 01/02/2009

Submission Content/Notes : For the rail system to actually achieve its stated purpose of alleviating traffic from the West side, the main line MUST include in its initial build stops at Oahu's 2 major employers (Pearl Harbor & Waikiki) and 2 major destinations (Airport & Ala Moana Center). However, the current plan only includes Ala Moana Center. So you're not actually moving the people to where they actually want to go. And you're not actually going to take that many cars off the road.

The same thing goes for the continuing argument that UH Manoa needs to be connected by rail. First, you'd take more cars off the road at much less expense by actually building UH West, which has been waiting for a permanent campus since the 1970s.

Secondly, by 2030, we will no longer actually need to move people to the universities. We'll be able to move the universities into people's living rooms. In fact, UH already has a instructional telecommunication network linking students at other campuses to UH Manoa.

Likewise, closing the State government's Mililani telecommuting center -- instead of opening new ones in other communities -- was equally short-sighted and backward-thinking. Some people actually need to show up at work -- (like Pearl Harbor and Waikiki). But work that CAN be done offsite SHOULD be done offsite. THAT would take more cars off the road than any train would. But, again, the government is still trying to move people to their jobs instead of moving their jobs to the people.

We're already living in the Information Age. So why does it seem like our planning is still being done by cavemen?

I don't have a problem with building a rail system. While it's not a perfect or complete solution, I still think it's a good start. I just have a problem with being stupid about it.

The "Locally Preferred Alternative" (the Salt Lake route), which doesn't include Pearl Harbor, the airport and Waikiki, will not achieve your stated goal of reducing traffic from the West side. Which begs the question, just which "locals" actually "preferred" this alternative? And what is your TRUE objective here?

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Yes
Draft EIS Comment

RECORD # 273 DETAILS

Status : Initial Action Needed
Creation Date : 1/2/2009
Creator Affiliation :
First Name : Guillermo
Last Name : Colon
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Alternative Preference :
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City : Mililani
State : HI
Zip Code : 96789
Email : colong001@hawaii.rr.com
Telephone : 554-8637
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 01/02/2009
Submission Content/Notes : I have the following suggestions.
1. Maintenance Facility location, looking over the DEIS the LCC site would look like a better site than the Hoopili when you consider construction costs due to you will not need bring elevated guideway down to grade level. Also this site has a more central location. the Hoopili site however has more land area, would be less of an impact on surrounding areas and closer to the Kahe Power Plant. Which could be a benefit if there was a power outage. This site would provide less impact to surrounding area due to its rural location.
2. Bicycles, I see mention of parking areas for bikes at stations however will bikes be allowed on the rail cars? Allowing them on the rail cars will allow greater mobility options for the users of the rail system.
3. On the Airport route will passengers be allowed to bring on baggage, and if they are allowed how will this be addressed when transferring onto the bus?
4. I see that there will be numerous Traction Power Substations along the rail route will there be any Hazmat issues with the transformers in these substation?
5. Concerning the Traction Power Substations will there be security at the stations. Some will be located in secure area however some will be in isolated areas surrounded only by chain link fencing.
Reply Requested : Yes
Submission Type : Draft EIS Comment

RECORD # 275 DETAILS

Status : Initial Action Needed
Creation Date : 1/2/2009
Creator Affiliation :
First Name : MIKE
Last Name : smith
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Address : 103 kahako street
Alternative Preference :
Apt./Suite No. : B
City : kailua
State : HI
Zip Code : 96734
Email : poolguy@hawaii.rr.com
Telephone : 262-4226
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 01/02/2009
Submission Content/Notes : I read, a few weeks ago, of a suggestion to start the rail system in Pearl City and develop it to down town. This would give the fastest traffic relief and return on the investment. Believe this idear was nixed because the maintenance yard will be located at the west end of the track in Kapolei. A thought would be to still start and fully develop the system, Pearl City to down town, while symultaneously develop the yard and track only from Kapolei to Pearl City. Have cake and eat it too!
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 276 DETAILS

Status : Initial Action Needed
Creation Date : 1/2/2009
Creator Affiliation :
First Name : Rachel
Last Name : Neville
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Alternative Preference :
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City : Pearl City
State : HI
Zip Code : 96782
Email : rneville@hawaii.edu
Telephone : 292-6691
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 01/02/2009

Submission Content/Notes : The O'ahu Invasive Species Committee is concerned that the massive amount of construction equipment and materials that will be imported to the island may harbor species that do not currently occur on O'ahu and may become invasive. Dirty construction equipment is a known pathway for plant, animal and invertebrate invasive species. However, there is an easy way that the City and County of Honolulu can protect the island from these threats. The City can include in the Request for Bids specifications, a requirement that the winning bidder ensure any construction equipment or material imported to O'ahu from the mainland, neighbor islands or foreign countries be free of dirt, vegetative matter, insects and animals.

There are precedents for this action. The Hawai'i Department of Transportation has included such specifications in the Request for Bids for North-South Road. Australia and New Zealand, two policy leaders in invasive species prevention, require any equipment imported into their country be free of dirt and vegetative matter. Dirty equipment is sent back to its country of origin at the shipper's expense.

By requiring the chosen construction company to ensure that equipment and materials are clean, the City and County of Honolulu will save money in control efforts later.

Invasive species on construction equipment is a real threat. Seeds, vegetative matter, insects, and even small animals could be accidentally transported to O'ahu on large vehicles and harm our watersheds, local agriculture, environment and way of life. Invasive species such as pampas grass and Red Imported Fire Ant cost mainland taxpayers millions of dollars each year in control efforts. Requiring the companies constructing the light rail system to clean their equipment before they bring it to O'ahu will be a progressive and cost-effective step towards protecting our island from invasive species.

The O'ahu Invasive Species Committee would be happy to assist in any way the crafting of language to insert a clean-vehicle specification into the Request for Bids. Please call me at 292-6691 or email at rneville@hawaii.edu, should you have any questions about this comment. I have also mailed a hard copy to the Department of Transportation Services.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Yes
Draft EIS Comment

RECORD # 277 DETAILS

Status : Initial Action Needed
Creation Date : 1/3/2009
Creator Affiliation :
First Name : Hugh
Last Name : Lowery
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State : HI
Zip Code : 96786
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Telephone : 321-3629
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 01/03/2009
Submission Content/Notes : I am distressed at the inaccurate low cost estimates of the rail by the City Administration. Also, estimates of usage are misleading. The few City comments on private car parking and/or bus link infrastructure are a concern. The bus replacement plans for the next few years reduce quantity of bus replacements. The rail plan cite rerouting of buses to accomodate rail station access. I am concerned about existing buses to areas not supported by rail. I am afraid that the City may "Rob Peter to Pay Paul" resulting in reduced bus support.

The 10,000+ homes planned for Waipio Gentry area will exacerbate the Center of Oahu traffic for example. As a senior citizen, the increased property taxes impact me. With tourism in Hawaii reduced, I am sure the City will feel that they must increase property taxes again for to build and short term (and probably long term) subsidize rail support/use.

Prior to the election, The Mayor cited very few residential and business properties would be impacted by rail. Then he said a few people would be impacted for the good of many. Now more properties are being considered for impact. Why is the City inferring that I (and all Oahu residences) should trust them because they have experts and they know what is best for us all.

Reply Requested :
Submission Type : Draft EIS Comment

RECORD # 278 DETAILS

Status : Initial Action Needed
Creation Date : 1/4/2009
Creator Affiliation :
First Name : Mary
Last Name : Warren
Business/Organization :
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Alternative Preference :
Apt./Suite No. : 1604
City : Honolulu
State : HI
Zip Code : 96817
Email : ralphie_2000@hotmail.com
Telephone : 537-1655
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 01/04/2009
Submission Content/Notes : I find it appalling that you will still consider this rail system with our economy so bad and the GET collection is low. Instead of breaking up our island, I have never seen anyone try to close one lane for more busses to be able to bypass the traffic during peak hours. This would eliminate the danger of crazy cars cutting off busses and would give riders a faster ride to their destinations. We are on a beautiful island and ruining its beauty with a rail system is the most ridiculous thing I have ever heard of. Having additional jobs for these union workers and our county go into bankruptcy is STUPID!!! With the gas high I already see a cut in cars on the road. People love their cars and to cut down the roads they can drive on is STUPID! Unless you stop more cars from coming in, drivers will drive. The little ridership on this rail doesn't warrant the expense in building it or maintaining it. Both the state and county are cutting back in the budgets. We have much more pressing problems in this state and county. Wasting billions on rail instead of focusing on getting solar energy going in county and state offices or giving more to the education of our young is a much better way to spend our monies.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :

RECORD # 279 DETAILS

Status : Initial Action Needed
Creation Date : 1/4/2009
Creator Affiliation :
First Name : Sean
Last Name : Kuranishi
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Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96822
Email : sean-kuras@hotmail.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 01/04/2009
Submission Content/Notes : Does the rail transit system include plans for expansion and growth? I like and support the rail system a great deal but I believe that it should be available to many more people than the original plans include, especially if we all need to pay for it. I agree that west Oahu needs it the most but I would like to see it include the airport, Waikiki, UH Manoa, Hawaii Kai and possibly Kaneohe/Kailua as well. Also, I hope that the Bus system ties into the schedule of the Rail system. Making things more efficient will bring greater success to all parties. Thank you for listening and good luck.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 281 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
Creator Affiliation :
First Name : Kimberly
Last Name : Pine
Business/Organization : Representative, District 43
Address : HI State Capitol, 415 South Beretania Street
Alternative Preference :
Apt./Suite No. : 317
City : Honolulu
State : HI
Zip Code : 96813
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Kapolei
Other Submission Method : Main
Submission Date : 12/06/2009

Submission Content/Notes : Good morning. I am Representative Kimberly Pine, and I represent District 43, Ewa Beach, at the State Capitol, in the House of Representatives. First, I'm excited to be here. I'm glad that the voters have spoken and we can now move on to the real thing, so thank you for having me here. We will have more thorough written documentation of our comments before the January 7th deadline, but I first do want to express some feelings brought to me by some Ewa residents. We do feel strongly that the route should go to the airport, and that that shouldn't be changed, so we hope that that does happen. In our private poll, we discovered that about 25 percent of the citizens in my district do work at Pearl Harbor, and so that does not include those that work at the airport, so it will increase the number of people using the facility if the route goes to the airport.

According to what we have reviewed so far we're still reading that 400 page document, but we do not see anything defined in terms of baggage use. If we do change the route to the airport, we should include something that's more defined that would allow people to bring multiple baggage. Also, we did not see in the document that we read so far, that there is nothing to accommodate bicycles, and so we really believe to encourage all types of connectivity, that that should be more thoroughly defined. Definitely, we believe that there should be a more thorough planning in terms of the connectivity with the colleges. Definitely, U.H. West Oahu is in there, and we're definitely pushing for the U.H. Manoa connection.

In terms of emergency evacuation procedures, my district is concerned about something being more defined in terms of power failure and evacuation procedures for safety reasons. But that's it for now. Thank you so much for having me, and we will have a written document to you very shortly. Mahalo.

Reply Requested :

Submission Type :

FOIA (Freedom of Information Request) Request :

FOIA Referral Date :

FOIA Response Date :

Draft EIS Comment

No

RECORD # 282 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
Creator Affiliation :
First Name : Rodlyn
Last Name : Brown
Business/Organization :
Address : 85-303 Kohai Place
Alternative Preference :
Apt./Suite No. :
City : Waianae
State : HI
Zip Code : 96792
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Kapolei
Other Submission Method : Main
Submission Date : 12/06/2009
Submission Content/Notes : My name is Rodlyn Brown, and I'm from Waianae. First thing is, I am in favor of the train. But being from Waianae, with one road, we have a very difficult time getting here or getting home. Yesterday, it took the people two hours to get from Kapolei to Waianae, after the roads had been cleared of construction work. So if this group wants to help and have our support from the Waianae Coast, they have to do something about the second road out of Waianae. There is no alternative. We are the only location on the entire island that has no way in or out, except for Farrington Highway.
And we need to get to the train just like everybody else does, and we are supportive of the train, in every way, but we need this group to be supportive of us. So if you would please consider the fact that federal funds are for all the people, not some of the people, and that more and more residents are coming to Kapolei and Makakilo, and from Kapolei, all the way to Makaha, and our commute just from Kapolei, home, two hours now, three hours next year, six hours out of our day, every day, please, please, support our needs, as we will support yours. Thank you.
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :

RECORD # 283 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
Creator Affiliation :
First Name : Frank
Last Name : Genadio
Business/Organization :
Address : 92-1370 Kikaha Street
Alternative Preference :
Apt./Suite No. :
City : Kapolei
State : HI
Zip Code : 96707
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Kapolei
Other Submission Method : Main
Submission Date : 12/06/2009

Submission Content/Notes : Frank Genadio, Makakilo. The city administration has apparently taken the selection of the transit technology from the City Council, which killed the ballot question for a fixed guideway, instead passed one with steel wheels wording. Approval of steel wheels on the ballot does not eliminate other suppliers from the competition, but the EIS brushes off three technologies by using a recommendation from a so called expert panel. This limiting of alternatives was referred to in the state's review of the EIS as troubling.

I am here to support the HSST urban mag lev system. EIS Chapter 02 covers Alternatives Considered. In Section 2.1.3, magnetic levitation is listed as a proprietary system unproven in the U.S. Because it is not in the U.S., does not make it unproven. Using this rationale would leave us still traveling in covered wagons. The Federal Transit Administration calls the HSST a mature technology, and the system has been in highly reliable revenue service in Japan since early 2005.

The EIS states that "none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail." For the mag lev, that statement is false. It is faster, much quieter, and safer because of its wrap around the beam configuration. Its guideway is 20 percent cheaper to build. This is important when one examines guideway length for the three alternatives and compares costs in Chapter 06 with expected sources of funds.

The city has funding for a 20 mile MOS, but in Section 2.2.2 shows a combined airport and Salt Lake alternative of 25 miles. This not only places the project over projected budgets, but excludes any extension to the UH Manoa campus. Personally, I favor the airport routing, over Salt Lake. If, however, the HSST were to win the transit competition, it could satisfy most requirements.

If labor and materials planned for the MOS were applied to the mag lev, five added miles of guideway could be built within the MOS budget and timelines, accommodating an airport alignment, extension to UH Manoa, and spurs into Salt Lake, as well as Waikiki. The only way to take advantage of such costs savings is to ensure that guideway specifications are left open.

Figure 2 9 shows a guideway of 28 to 32 feet, as well as a wall for noise mitigation. The HSST uses two beams with open space between the beams and a cross section of 21 feet, with no need for noise walls. The mag lev's narrower guideway (3 minute time limit) coupled with the much lower sound level of the system, will result in less impact on homes and businesses along the route. Figure 2 9 should be deleted and kept...

HEARING OFFICER HAMAYASU: Please summarize.

FRANK GENADIO: I just have a couple.

HEARING OFFICER HAMAYASU: Okay.

FRANK GENADIO: ...should be deleted and kept out of the RFP.

O&M costs also for mag lev, \$12 to 18 million less per year than the steel wheel. Prevent the mag lev from competing and we pay more for what may be an inferior system. If the city is so certain that steel on steel is superior, modify this EIS appropriately and keep specifications general enough to enable all suppliers to have a chance. After I testified to Council the other day, someone came up to me and said that adding...

HEARING OFFICER HAMAYASU: Please summarize.

FRANK GENADIO: I just have the one sentence.

HEARING OFFICER HAMAYASU: Go on.

FRANK GENADIO: ...adding \$1.5 million to EIS, that's one 36,000th of the cost of the project. This would be money well spent. Thank you.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Draft EIS Comment
No

RECORD # 284 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
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Submission Method : Transcript - Kapolei
Other Submission Method : Main
Submission Date : 12/06/2009
Submission Content/Notes : Michael Golojuch, Jr., Makakilo resident. I'm here today to testify in favor of the steel on steel rail, with the airport route. It doesn't make any sense that we would not have included the airport in the first time around. We know Romy Cachola used his little power, got what we wanted and now he's then he decided that he didn't really want to support rail. So I do come out here today to ask that we do move forward, we do move forward with keeping it in the original, starting off in Kapolei and moving forward. By building it and starting in Pearl City, you are going to displace more people, you are going to cause more people to lose their homes and businesses quickly, without giving them chance to really relocate. It doesn't make any sense. We could start off by building the base yard here, on Kapolei, where there's plenty of space and we can move forward. That's basically it. Thank you.
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :
FOIA Response Date :

RECORD # 285 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
Creator Affiliation :
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Last Name : Golojuch
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Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Kapolei
Other Submission Method : Main
Submission Date : 12/06/2009

Submission Content/Notes : Good morning. I'm Michael Golojuch. I am the Vice Chair and the Transportation Chair of the Makakilo/Kapolei/Honokai Hale Neighborhood Board. We support the rail system and we support the MOS, with the airport route. Eventually, we would like to see the rail system expanded, but we know we gotta get the MOS built first, 'cause we want it to go to U.H. I'd like to see it go to Waianae and I'd like to see it go to other locations, too. And some day, I would like to go to the U.H. game by getting on the bus, coming down, getting on the rail, then getting off by the stadium.

We really believe that we need this system. There are some things Maeda Timson, the Chair, could not be here because she's on a trip. We will be submitting written testimony, as well as just my verbal support today. As an individual, I know it's important to get this done. It's important to start with Kapolei, where there's less problems, to start, and get it going and moving it fast, and finding out where there may be problems in the construction, so by the time it gets through Waipahu, Pearl City, et cetera, and through town, that will be done. Plus we'll have the base yard. We have the area, and the lands are already being designated from the Draft EIS for that, and we won't have to disturb, as previously mentioned, as many residents and/or businesses to get that first segment built up, in the Kapolei area. And I strongly support that, and don't let the political part get in there for people running for different offices just to use this now as another pay, getting their ploys.

So, again, support the system, and on specifics and things, and as mentioned, there is a need for people to carry luggage. Maybe not a lot of luggage 'cause I really see the people going by the airport, the business people coming in and not more than tourists, but there still needs to be that capability for both to use the rail system. Thank you.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :
FOIA Response Date :

RECORD # 286 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
Creator Affiliation :
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Submission Method : Transcript - Kapolei
Other Submission Method : Main
Submission Date : 12/06/2009
Submission Content/Notes : Aloha. I'm Pat Patterson from Makaha Valley, a member of AARP and of Concerned Elders of Waianae. I have three issues. First of all, I really resent all my taxpayer money that was spent on the slick stuff to get people to vote for the rail steel on steel. I think the vote was so close, that it should not have been counted yea.

No. 2. I really respect Jim Brewer and Renee Ing for having gone to Europe and tried out the Phileas Magnet Rail, brought back and shown on Olelo, how wonderful that is, with the bus train moving only on magnets in the pavement. That would be very, very inexpensive, would be done quickly, would use a lot of our workers and be much more compatible with our island.

And No. 3. If you really want rail, why don't you restore the old OR&L, all the way to Kaena Point, and give the Waianae Makaha residents access to what's going to be way beyond, and we are people who have to work in town. We really need something. The 93 bus is wonderful, the country express is good as far as it goes, but think about restoring OR&L, all the way to the end of the island on the southwest end. Mahalo.

Reply Requested :
Submission Type : Draft EIS Comment

RECORD # 287 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
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Submission Method : Transcript - Kapolei
Other Submission Method : Main
Submission Date : 12/06/2009
Submission Content/Notes : My name is Tesha Malama. I am an Ewa Beach resident and also responsible for the Kalaeloa District. I am speaking in favor of the rail project, the minimum operating segment, and also with the alignment through to the airport. As an Ewa Beach resident, if we had the leadership and commitment to do these types of projects 10 years ago for the widening of Fort Weaver Road, and 15 years ago, to bring in the North South Road, we would not be in the hell we live in now, in Ewa Beach. This rail project will add to the multi motor approach that we need, as a county, to move people around this entire island. I think one of the integral parts of the rail will be how TheBus system links up to the rail centers and getting the community involved in planning the rail center points.

And so we need, No. 1, the infrastructure money that it's going to bring in, so people have immediate jobs during this time of the economic system. Being responsible for Kalaeloa, I need to have that type of commitment and funding that it will bring into the district. As we build out Kalaeloa, access for Ewa Beach residents to the rail center will be less than five minutes from every household in Ewa Beach. We need everything, we need it now, and I say whoever is going to get on the rail late, they should really move aside, so we can get this project done. Thank you.

Reply Requested :
Submission Type : Draft EIS Comment

RECORD # 288 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
Creator Affiliation :
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Add to Mailing List : None
Submission Method : Transcript - Kapolei
Other Submission Method : Main
Submission Date : 12/06/2009
Submission Content/Notes : Good morning. My name is John Higgins, I'm an Ewa Beach resident. I'm here to support the rail system and going through the airport route. I think that we should have a firm commitment on federal money. I know that that's been given to us, but in speaking to people next door, there was no indication of when the federal money would actually come, and with the economic situation the way it is, I think we should have a firm commitment from the next administration in Washington, that we're going to get this money. Now, we got great senators, and congressmen, and Democratic president, which would bow to having us get the money, but we need a firm commitment. That money, if the federal money doesn't come, this project will stop dead in its tracks.

The other thing is, too, that the people that we see in the newspaper, talking about this project, Charles Djou, Romy Cachola, and the Mayor or one of his representatives are not here. They should be at every single one of these things for the two hours thereon to speak to the people. They've been spending millions of dollars to promote this, which I agree with, it should be done. But these politicians should be here to answer questions, to talk to us and let us talk to them. And that's my statement. Thank you.

Reply Requested :
Submission Type : Draft EIS Comment

RECORD # 289 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
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Last Name : Har
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Add to Mailing List : None
Submission Method : Transcript - Kapolei
Other Submission Method : Main
Submission Date : 12/06/2009

Submission Content/Notes : Thank you. Good morning. I'm Representative Sharon Har. I am the State Representative for the 40th District, which is comprised of Kapolei, Makakilo, Royal Kunia, and Kalaeloa. I am one of those politicians who is here today, and while the rail is not a State issue, it is a City and County issue. I do know that we have the firm commitment of our Mayor, as well as our council representatives on this side of the island. We do have the Mayor's representatives here, but I am here on behalf of myself as a private citizen and representative of Kapolei.

First of all, as the Chair of the 2007 Interim Task Force on Smart Growth Development, I am an ardent supporter of the rail's first segment, beginning here, in East Kapolei. Because one of the basic principles of smart growth development is transit oriented development. With all the development that we have occurring out here in our great new city and on the west side of the island, you must have transit beginning here, so that we can build smart growth projects. Smart growth projects basically incorporate transit around them, and it's one of the most effective tools to prevent urban sprawl. And that is my biggest concern, as we continue to develop on this side of the island. If government has decided that all of the development is going to happen on the west side of the island, then we must build under the principles of smart growth development, and transit oriented development is one of the basic ten principles of smart growth.

Secondly, one of the issues that came up in the Draft Environmental Impact Statement, was the fact that the two proposed base yards are located on the Leeward side of Oahu. In order for the transit to be developed, you have to have a base yard. And if the two proposed sites are out here, then, accordingly, you have to have the beginning segments out here, where the base yards are located.

Finally, my last point is that, again, to begin out on the west side of the island is imperative because you have to have construction in an area that's relatively undeveloped. There is so much built, you can't develop anymore in Aiea or in the urban core. It makes sense to build out here, when you have relatively least amount of development, and then as we build more houses, we build around transit, so that, again, we're promoting the principles of smart growth.

So, I do have copies of my testimony, as well. I thank you for this opportunity to testify.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Draft EIS Comment
No

RECORD # 290 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
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Submission Method : Transcript - Kapolei
Other Submission Method : Main
Submission Date : 12/06/2009
Submission Content/Notes : Good morning, panel. My name is Rosita, and I am a resident of Makakilo. I'm here to testify just as a regular resident who has been catching the bus every day for 20 years. My concern is not really that I'm going to miss my express bus, but it takes only 30 minutes from Kapolei, Makakilo to Dillingham, and it takes 25 minutes from Dillingham to downtown. So I would support the first, the new idea of starting the system in downtown because if something ever happened, at least it will alleviate the traffic in downtown first, and not stuck here in the middle of the island. That's my first concern.
My second concern is, is the system going to have an express system during the rush hours, during the morning and in the afternoon? Thank you.
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :
FOIA Response Date :

RECORD # 291 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
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Submission Method : Transcript - Blaisdell
Other Submission Method : Main
Submission Date : 12/08/2009

Submission Content/Notes : My name is Bob Loy. I am testifying on behalf of Na Leo Pohai, the public policy affiliate of The Outdoor Circle, Honolulu, Hawaii. The Honolulu transit project is destined to become the singlemost visually dominant, intrusive, obstructive, and destructive construction project in the history of Hawaii. While its ability to ease traffic problems on Oahu has been the subject of lengthy debate. Its negative impact on the visual environment of this island is beyond any denial, and is virtually immeasurable.

I'm going to take you on a trip along the route, and I'm going to use as the words of the impacts, words that had been taken directly from the Draft Environmental Impact Statement. It will change the open and end of all character of the Ewa Plain, substantially change views in Salt Lake city because of the size of the station and the rail line, obstruct views of East Lot in Pearl Harbor, in Pearl City. In Kahili, the dominant features will be the views of this project will be the dominant features down Dillingham Boulevard. In Chinatown, it becomes an esthetic disaster. The blocked makai views and will be out of character with the pedestrian oriented environment in one of the most historic and sensitive neighborhoods on the island. Passing through and going to downtown, it will be the dominant feature of the views on Nimitz Highway. It will contrast substantially with the pedestrian character in the streetscape and substantially affect the visual setting of Dillingham Transportation Building in Irwin Park. It will block makai views for numerous residents. Overall, visual effects would be high.

Going through and down towards Ala Moana Center, blocked views in the 4th and 5th floor residences, increased light and glare on upper story residences. Throughout this part of the city, the project will block protected mauka makai views of the Koolau mountains, Waianae mountains, Pacific Ocean, Honolulu Harbor, Diamond Head, Punchbowl, and Aliamanu Craters. Overall, the effects will be high. But for all the destructive and negative impacts on view plains spelled out in the DEIS, there are virtually no details about how these substantial damages will be mitigated. The document contains broad promises of designing various elements to minimize negative visual effects. The lack of specific descriptions of how to overcome the visual misery that will be heaped upon the Oahu landscape, leaves our organization with little confidence that damage to the visual environment can or will be mitigated as the project moves forward.

We also have great concerns about the trees, particularly the kamani trees on Dillingham Boulevard and the monkey pod trees on Kapiolani (3 minute limit).

HEARING OFFICER HAMAYASU: Please summarize.

BOB LOY: That's the end. Thank you.

Reply Requested :

Submission Type :

Draft EIS Comment

RECORD # 292 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
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Other Submission Method :
Submission Date : 01/05/2009

Submission Content/Notes : Dear Sirs,

I'm writing to share my thoughts regarding the draft Environmental Impact Study (EIS).

I will not address the Air Port vs. Salt Lake route alignment here, as I believe that is still being decided by the City Council. I will share my thoughts on that with them.

1. The Goals and Objectives of this project are not adequately defined and documented in this report. Many of the issues coming up could be addressed and resolved much quicker and better if everyone had a better idea of what we were trying to accomplish. (Planning and defining are (or should be) half the work). Are we trying to get people out of their cars? Reduce freeway traffic congestion? Commute traffic? Get people around town faster? Improve our tourist industry? Reduce carbon emissions? Replace The Bus with a rail line? What? The Objectives should dictate the design and route and stations.

2. The project does not contain adequate detailed measurable criteria for judging and evaluation the ultimate success or failure of the project. Are the total cost and the reduction of the number of cars on the freeways in the corridor the only measures we are going to use? By the way, your projections of future freeway traffic are incorrect. There will not be such a large increase in this traffic because when they get there, there will be no place to park! Forecast the parking situation and costs and I think you will agree.

3. Doesn't it make more sense to start where we can get the biggest and earliest "bang for our buck"? If we start it in the empty fields of Kapolei and run it to Waipahu, the rider ship will be very low for a long time. We will have high construction costs and operating costs and little revenue or effect on our Goals (Don't forget we will have to start paying for it whether we have construction delays or not!). If we ran it from the Stadium to town (with a good Park and Ride at the Stadium (traffic from H1, H2 and H3 could park here and ride in), the rider ship and revenue would be high and the Goals would be impacted much sooner. Phase 2 should be from town to Waikiki and UH for the same reasons.

4. Why is the route not using the (existing and government owned) Oahu Railroad right of way? This would cause much less disruption, be cheaper and faster to build because of less land acquisitions and provide a shorter, faster, cheaper route.

5. Why is the alignment using Fort Barrette Road instead of Renton Road or Kapolei Parkway? Either of these would be shorter, faster, cheaper and be less disruptive during construction. (Remember, no matter where we put it most people are going to have to ride The Bus or drive their cars to get to the rail Station. So, we don't have to have the rail go by everyone's front door.)

6. There are not enough Park and Rides in the system (except for Kapolei, which may have too many). Remember, people are not going to give up their cars completely and most people will have to take The Bus or their cars to get to the rail station. Also, the Park and Rides need to adequately address Moped and bike use and provide for adequate safety and security for people and property.

7. This document does not adequately address and document the

interface and integration of the rail and The Bus. To be successful, The Bus must provide an effective collection and disbursement system for each station. This document also does not address the means by which this coordination at higher administrative levels will occur.

8. Does the system have too many stations? Each station requires the train to slow down and speed up as well as sit for a period in the station. The number of stops significantly affects the speed of travel. If we have too many stations close to town and Waikiki we may shift bus riders to the rail and overload the rail and reduce the effectiveness of The Bus and not get any more cars off the road. We need to think of the Rail as a Wholesale operation (fast movement of large groups of people over long distances. And, rely on The Bus for Retail "short hops". To get people to give up their cars, the alternative must be noticeably faster and cheaper and at least close to as clean, comfortable and safe.

9. I don't see anything in this EIS about dealing with luggage for riders going to or coming from the airport. No use using an Airport alignment if riders can't take their luggage. Oops there go all the tourists and a lot of locals. (And tourists rent and then drive a lot of cars!

10. Because this is being referred to as Rail, will it fall under the Federal agencies that regulate Railroads? Will the workers be able to join the national railroad unions and their pay, benefits and working conditions negotiated at a National level?

11. We can take our bikes on The Bus. Will we be able to take our bikes on Rail?

12. When we built the Stadium, we did not take into account the salt air and humid conditions here, which have resulted in continuing high maintenance costs. What are you doing to insure that we don't experience the same result with the Rail system (and Stations)?

Sincerely
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Reply Requested :
Submission Type :
**FOIA (Freedom of
Information Request)
Request :**
FOIA Referral Date :
FOIA Response Date :

Yes
Draft EIS Comment

RECORD # 293 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
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Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Blaisdell
Other Submission Method : Main
Submission Date : 12/08/2009

Submission Content/Notes : My name is Fred Abe. I'm an inactive attorney. I was born in Honolulu, and I lived in Makaha from 1971 to 2007. I will never catch the transit if I was still living in Makaha. The transit does not address the basic problem. The basic problem is to eliminate 50 percent of the commuters that go to and from work, and I'm proposing instead, that all buses be used, and I'm talking about the whole island, not just 20 miles from Kapolei to Honolulu. All buses will be free during that three hour period in the morning and in the afternoon.

2. The electric buses instead of diesels. And the reason for that, every bus should be enough so that everybody has a seat, whether you're catching the bus in Kahuku, Kailua, Waimanalo, even Hawaii Kai and Kapolei. Right now, between H 1 and the H 2, the Mililani group, including the people from Wahiawa and those from Mililani, if they can catch a bus and free air condition and they have a seat, I think we can have the people address might be able to divorce themselves from riding the cars. Financially, I think it would work.

According to the Honolulu Advertiser of November 23, 2008, it says that we cost 525 buses. I think we can get a thousand buses on the road, and only during that peak three hours in the morning and three hours in the afternoon. It takes \$160 million to operate the buses now, of which the City and County subsidized it by 130 million. I'm suggesting that we will spend maybe 200 million, and instead of an annual subsidy of 130 (3 minute limit) now, I have more testimony, but the basic thing is how we can get the 50 percent of the cars off of the road. That's the conclusion, and I think it can be done. Thank you.

HEARING OFFICER HAMAYASU: Thank you.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Draft EIS Comment
No

RECORD # 294 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
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Submission Method : Transcript - Blaisdell
Other Submission Method : Main
Submission Date : 12/08/2009
Submission Content/Notes : My name is John Kato, and I'm speaking as a private citizen. I'm a former chair of McCully/Moiliili Neighborhood Board No. 8, and I'm speaking in favor of the fixed rail system. I believe the fixed rail system will be a benefit to the members of the community. I believe that a common nature of a transit rail development will be of great use for the people in the community who are property owners. In any rate, that concludes my presentation.

HEARING OFFICER HAMAYASU: Thank you.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :
FOIA Response Date :

RECORD # 295 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
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Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Kapolei
Other Submission Method : Main
Submission Date : 12/08/2009

Submission Content/Notes : Good evening. My name is Sidney Char. I'm the current president of the American Institute of Architects, Honolulu Chapter, and my comments, here, represents the majority viewpoint of our membership and our Transit Task Force. We have submitted written testimony, but I will highlight some of the key points of the testimony. First of all, for the record, we support the concept and the implementation of a fixed guideway system of the steel on steel rail. However, we believe that the Draft EIS does not address several points of concern for us.

Firstly, integration of social and economic approach of resources, we believe that stronger community planning objective should be described to create better and desirable living communities, such as they did in Portland, Salt Lake, and Sacramento. We believe that the Draft EIS focuses primarily heavily on just the transportation aspects of this system. We believe that the Draft EIS does not respond to Honolulu's Primary Urban Center Development Planning, which mandates that guidelines to preserve the mauka makai view corridors along major collector streets be preserved. We believe that the elevated structures along Nimitz include historic Chinatown and even going up into Manoa violates that policy. Mitigation of the negative impacts of our panoramic mountain and ocean waterfront views are not well explained or adequately illustrated. Other major cities such as San Francisco and Boston have removed such large similar structures on their waterfront, and even Seattle is considering and exploring ways of taking down their Alaskan viaduct.

Secondly, the AIA advocates creation of safe, healthy, and easily accessible environments for the transit passengers. We believe that the EIS has not described how to mitigate undesirable environments under the elevated guideway areas.

Third, the AIA promotes sustainable planning, design, and operation of transit systems. And we note that the Draft EIS says it will take over seven times the energy to construct the elevated guideway as compared to an at grade system. We believe that the life cycle cost of the comparison of the elevated system to an at grade system should be explored. We are not convinced that the elevated system is the most cost effective (3 minute limit).

Lastly, the AIA urges the city to consider a more flexible rail technology, which will allow transit to be at grade, below grade, or above grade, as conditions require. Flexibility will allow us to be more easily adaptable

HEARING OFFICER HAMAYASU: Please summarize.

SIDNEY CHAR: Thank you.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :

Draft EIS Comment
No

RECORD # 296 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
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Submission Method : Transcript - Blaisdell
Other Submission Method : Main
Submission Date : 12/08/2009
Submission Content/Notes : I'm Ralph Bruinsslot, a licensed architect in Hawaii. I totally endorse what the AIA has put forth as their guidelines. I would like to share with and put on record my experience of living in San Francisco and working in San Francisco, and watching them build a raised highway along the waterfront, later to abandon it and tear it down. I actually worked with my window facing where they were part of the freeway that they were tearing down, and with the cost, it had to exceed three times the cost of putting it up. And that was because of the outrage of the citizens of San Francisco, to the visual damage that it did on the waterfront.

Now, they have replaced that with an on grade transit system. They've developed that area very effectively, and the combination of ferries from the outside lined area coming in, I watched it. I lived in Sonoma County and Marin County, and it started out 45 minutes, 35 miles, now it's two hours, if you can get there in two hours. So the mitigation they have taken is ferries, transit, and trying to move the transit system on up a hundred miles north of San Francisco. So it would be my encouragement to pay very close attention to the esthetics of installing above grade transit system wherever possible, where it's feasible, it works, but when you're talking about downtown and areas that are very sensitive to structures, the backlash could be tremendous. Thank you.

Reply Requested :
Submission Type : Draft EIS Comment

RECORD # 297 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
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Submission Method : Transcript - Blaisdell
Other Submission Method : Main
Submission Date : 12/08/2009

Submission Content/Notes : Thank you. My name is Herb Rothouse, retired, and I live in Waikiki. The first speaker and the second speaker, I agree with, entirely, and I support their premise. I was against the rail from the very beginning, for several reasons. I won't go into all the reasons, but I will address two things. Number one, the cost. I compare to what happened in Washington, D.C. recently, where a visitor said, who was opened up to Congress, originally budgeted for 300 , end up costing almost 800 million. So I doubt very much the figures that we have been given, first 3 and a half billion for the rail, 4 billion for the rail, it would come no surprise to me if it ends up at 8 billion. I just cannot trust government figures when it comes to estimates of projects, they've never been on the mark so far.

Secondly, great deal of money has been spent so far, many people here may realize already, close to \$100 million, I understand from what I read in The Advertiser, has been spent on consultants and attorneys for this program. \$100 million dollars. When I think of TheBus system, which certainly needs help, as the second speaker pointed out, if you look on Route 14, on Kapahulu, the bus runs one bus an hour. One an hour. On the 23 route, that runs one bus an hour. \$100 million on consultants, and yet we have a bus system that runs one bus an hour? I mean, that's a disgrace. That's a disgrace, absolute disgrace.

You want to get people off the roads? Well, how are you going to get them off the roads, when you don't have adequate buses? You look at the TV in the morning shows H 1 highway, where are the buses? You could double, double the number of buses we have, with the money spent on consultants, bringing in the bus service to areas that get no service whatsoever, right now, and increasing where it's one an hour, make it three an hour. You want people to give up, not use their cars? Well, provide proper bus service, frequently, available, and people will not use their cars like they do. That's all I have to say. Thank you.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Draft EIS Comment
No

RECORD # 298 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
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Submission Method : Transcript - Blaisdell
Other Submission Method : Main
Submission Date : 12/08/2009

Submission Content/Notes : Aloha and good evening. My name is Leslie Among. I'm with the Waikiki Neighborhood Board, District 9. Recently, our board has voted against the mass transit, but the election that people have spoken and most of the people showed that they want the mass transit. I ask, as a neighborhood board member, that we have a responsible EIS draft for the residents and the people of Waikiki. And as far as the route, it leads from Ala Moana, down towards McCully, down Kapiolani and then it turns off to University Avenue, the residents in that district have come down and spoken to some of the members on our board, and fear that the space and infrastructures, that doesn't provide the room for the transit.

Recently, I proposed an idea on the board, with some of the engineers that came and were so gracious to come and address some of the issues of the transit, that the route be changed and be put alongside the Ala Wai Canal, as it snakes its way toward the golf course, to the Manoa and Palolo Streams. As it snakes it up that way, it will go all the way up to the U.H. campus, by Kalele Road, in back of where the U.H. baseball field is. This looks like a very responsible place to put up mass transit, in the light of issues such as eminent domain, litigations, and people being displaced by the project, some have opposed.

What I ask is a more responsible approach, and I do believe that the propose I told to my board and to the engineers that night, that a good route for the transit would be from Ala Moana, and to snake its way, up the Ala Wai Canal, on the mauka side, and make its way up the Palolo Stream and the Manoa Stream. There will be less mishaps with eminent domain issues and people being misplaced, as I said, and I really feel that, you know, the inconvenience is on a lot of the people that are living there. I know some people feel like the inconvenience is on the project, on the other side, but I happen to feel that there should be a common ground where that would be a great route to take.

And to add another note to that, recently, Hard Rock Cafe has moved into Waikiki, so the Hard Rock property will be available maybe for a station on the gateway of Waikiki for the mass transit, or some stop or something, that property should be available (3 minute limit).

Thank you so much. In closing, I just would like to say, we're looking for a responsible approach to this EIS, and the capacity and the effects it will have on the people in our districts in Waikiki and there, on University Avenue, and McCully area and the U.H. Thank you so much.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Draft EIS Comment
No

RECORD # 299 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
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Submission Method : Transcript - Blaisdell
Other Submission Method : Main
Submission Date : 12/08/2009

Submission Content/Notes : My name is Richard Ubersax. The purpose of the DEIS is to provide the City and County, the FTA, and the public with the information necessary to make an informed decision, based on a full and open analysis of costs, benefits, and environmental impacts of the alternatives considered. However, it seems that in some respects, the DEIS is aimed at convincing the public and the FTA of the benefits of the Project, rather than inform the public completely. One example is in the cost effectiveness of the project. The FTA's cost effectiveness index is a ratio formed by adding an alternative's annualized capital cost to its year 2030 operating and maintenance cost, and the total is divided by user benefits, in hour saves.

Any proposed New Starts project receiving less than a "Medium" cost effectiveness index rating will not be recommended for funding by the FTA. The threshold between a rating of "Medium" and "Medium Low" is \$22.99 for user benefit expressed in dollars per hour of user benefit. In the Alternatives Analysis, the cost effectiveness index for the 20 mile alignment from East Kapolei to Ala Moana Center is stated as \$21.34; and for the full project from West Kapolei to UH Manoa with an extension to Waikiki as \$27.05. Thus, the 20 mile segment meets the threshold of \$22.99, but the full project does not.

City ordinance 07 001 recommended the North South Road/Airport option as the preferred minimum operational segment for several reasons, one of which being that the cost effectiveness index of \$22.56 is below the FTA's threshold of \$22.99. Now, in the DEIS, the cost effectiveness index has markedly improved to a point that is significantly below the FTA threshold of \$22.99: \$17.53 for the Salt Lake Alternative, \$17.78 for the Airport Alternative, \$22.86 for the combined Salt Lake/Airport Alternative. Information for the full project with extensions is conspicuously absent in the DEIS although it was available in the AA. We know that the capital cost and operational and maintenance costs have not reduced, so that the only explanation is that the user benefits have increased significantly (3 minute limit). In conclusion, this issue of user benefits and the exclusion and the conspicuous absence of including the three extensions in the overall analysis need to be scrutinized thoroughly by the FTA. Thank you.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Draft EIS Comment
No

RECORD # 300 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
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Add to Mailing List : None
Submission Method : Transcript - Blaisdell
Other Submission Method : Main
Submission Date : 12/08/2009

Submission Content/Notes : Hi, my name is Chris Dolph from Waikiki. My concern is, basically, during this tough economic times, whether it's really wise for us to be spending so much money on a project, that it is the most expensive project the state has taken on. We already have in effect, HOV lanes, carpool lanes, contraflow lanes, and I was wondering what's the possibility of us using those also as toll lanes. Many people have had experience with toll lanes and how they alleviate traffic. This would generate money for the state instead of spending money. I'm concerned about how our tax will be used, and the people who would be utilizing the toll lanes are, well, I see them as being the people who need it; and the people who don't need it, would not have to pay for this expensive project.

I'm a total fan of what this fellow is suggesting here, increasing the buses, the bus routes, and I'd like to see some initiative in encouraging people to use the public transit, and I love that suggestion about making them free during these rush hour times. A previous testimony that I had heard was of one lady who was speaking about she won't even be able to ride the transit unless she gets on the bus to get to the transit, and then get off the transit and ride another bus to the destination. Just staying on the bus the entire way would work. I think it's a great system. Even though I do have a car now, my wife and I chose to live for five years without a car, here in Honolulu, and TheBus system worked great for us. If it were improved, I could easily go back to living without a car. So that's it. Thank you.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Draft EIS Comment
No

RECORD # 301 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
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Add to Mailing List : None
Submission Method : Transcript - Blaisdell
Other Submission Method : Main
Submission Date : 12/08/2009

Submission Content/Notes : Hi, I'm Steve Scott, with Scott Hawaii. We have property on Kona Street. I have a couple points that, for me, are a concern. The first is, as the mass transit goes through Kakaako, it goes through a very dense area with regards to property, with regards to businesses, and it's going to impact, especially on Kona Street, almost every property from Queen Street all the way to Piikoi. My biggest concern there, is just the cost. Just in that one corner of Pensacola and Kona Street, you have approximately \$25 million, which is, I understand it would be about one quarter of the total land acquisition on one corner.

So my big problem is, all of the projections that the city had with regard to land acquisitions have to be totally inadequate. I've read in the EIS, that you have about 95 to \$100 million allocated. How can you possibly spend on one corner, \$25 million?

The second concern I have, is with regards to the route, as it goes down Kona Street. In the EIS when it first came out, prior to the election, there was never any notification that this was not going to go past Ala Moana Center. Right now, that I just saw, there was an engineering drawing, only, that shows a third rail that's going to go over Nordstrom. The existing the initial construction was going to end, dead end into Ala Moana Building, at 40 feet. Then they plan on putting a third rail, one line that is going to go over supposedly Nordstrom there. When that goes in, you're taking more property. The route is going to be wider and you're going to take more property than you need to, initially.

So why wasn't this in the alternatives analysis? Why wasn't this made known to the public? Basically, you're telling, by what you've put on the EIS, the Draft EIS, that you're not going to build past Ala Moana, because there's no way that you can build one rail, one line that goes over Ala Moana and that's going to serve the U.H. and Waikiki. This was never made known to anyone prior to just a couple weeks ago, when the city came out with the Draft EIS, and even then, this drawing wasn't on that. So the city and Parsons & Brinckerhoff have been totally disingenuous with regards to making all this information available so that people can make an informed decision from vote prior to the general election in November. Thank you.

Reply Requested :

Submission Type :

FOIA (Freedom of Information Request) Request :

FOIA Referral Date :

FOIA Response Date :

Draft EIS Comment

No

RECORD # 302 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
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Submission Method : Transcript - Blaisdell
Other Submission Method : Main
Submission Date : 12/08/2009
Submission Content/Notes : Good evening. My name is Bryan Hoernig, and I also own a property on Kona Street. On Kona Street, like Mr. Scott says, is very dense and is displacing a lot of people. By condemning what I'm in now on a condemnation list, at this point, by just condemning my property, you're not just condemning my property. You're condemning by business, my livelihood, and that of my employees. I can only pray at this point, that you guys can reconsider how many people you are going to be displacing by this transit system.

I don't understand why we are put on late notice of this. I mean, it's just like coming home tonight and saying, well, we got a note, here, and it says that we're not going to be able to own our property anymore, you're just going to be thrown out. And that's how I felt about it. I didn't get any notice, I didn't get anything. All I got was a letter that says I'm on a condemnation list. So I'm put on notice that I don't have a business anymore, I don't have you know, for my employees and everything else, and I think it's been handled very poorly. Thank you.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :

RECORD # 303 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
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Add to Mailing List : None
Submission Method : Transcript - Blaisdell
Other Submission Method : Main
Submission Date : 12/08/2009

Submission Content/Notes : Good evening. My name is Terrence Conlan, and I'm speaking as a private citizen. It's obvious that a lot of work has been done on this, so far. It's also obvious that there is tremendous amount of work yet to be done. One of the biggest criticisms I have of this study, is that it does not contain a defined measurable criteria for ultimately evaluating the success or failure of this project. It has a lot of general statements but nothing really measurable. So when we get to the end, we won't know if we made it or not.

I agree with Councilman Djou, that we need to start at either Salt Lake or the stadium, and come to town, so that we can begin generating revenue immediately, to help fund the rest of the system and begin to pay off the initial costs. If we start at Kapolei, it will be a long time before we get any money back.

I think we should use the Oahu rail line, which the state already owns, instead of trying to buy up new property. Everyone who lives along that corridor has always known that there was a rail right of way there, and their properties reflect that.

I do not believe that there are enough park and rides except in Kapolei, where there may be too many. If we want people to use this system, we have to provide park and rides that are convenient for them to drive their cars to the stations, in addition to those riding the bus.

I also question whether or not this rail system has any plans to allow people to bring luggage with them. If we're going to go to the airport and service the airport, then we have to provide for a way for them to transport their luggage; otherwise, it will do them no go.

Finally, I think that the EIS has a long ways to go. There are a lot of questions that haven't been answered, and a lot more work needs to go into that. Thank you.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Draft EIS Comment
No

RECORD # 304 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
Creator Affiliation :
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Submission Method : Transcript - Blaisdell
Other Submission Method : Main
Submission Date : 12/08/2009

Submission Content/Notes : Good evening. I'm Amy Kimura. I testify tonight as an ordinary citizen who rides public transit wherever I've lived and traveled and who likes it, for the most part. I enjoyed commuting on the subways in New York City and Japan. As a traveler, I've ridden on trains and buses in Europe, Canada, and the United States. I list these because many people think everyone who is against the proposed Honolulu rail dislikes mass transit, rail in particular. On the contrary, rail in the places that I've used them has been fast, convenient, efficient, and usually reasonably priced. But the populations served by them have been from two times to more than ten times Honolulu's population and could more easily support their operation and maintenance. One place it was not so reasonably priced was Vancouver, Canada. The SkyTrain was clean, convenient, and efficient, but way more expensive than Honolulu's bus system. A monthly adult pass cost \$73 to \$136, depending on the number of zones covered. That's about two to three times the \$40 cost here. What would that do to transit dependent riders here, people with no auto? In Vancouver, the monthly pass for seniors is \$42, more than the yearly cost of \$30 for seniors in Honolulu. What would that kind of cost do to seniors on limited and moderate incomes? For students, monthly passes in Vancouver are also \$42, twice as much as the \$20 a month charged by TheBus.

Transit dependent adult riders, the elderly and children will be greatly affected. Will the city be willing and able to greatly increase its subsidy of transit to keep down the prices of the transit passes for them? If not, how will that affect the quality of life of seniors of moderate or limited means? How about families of low, moderate, and even middle incomes? If not, how will that attract motorists out of their cars and onto the fixed guideway? If yes, how will that affect property tax rates for everyone?

If commuter passes increase in price, the choice riders are TheBus, those who have an available vehicle to ride but choose to ride TheBus, will likely choose to abandon commuting on public transit in favor of their car, adding to congestion.

Mahalo for giving me this opportunity to comment. In the future, more notice would be appreciated (3 minute limit). I received this newsletter announcing this hearing three days ago, on Friday, December 5th. Thank you.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Draft EIS Comment
No

RECORD # 305 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
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Telephone :
Telephone Extension :
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Submission Method : Transcript - Blaisdell
Other Submission Method : Main
Submission Date : 12/08/2009

Submission Content/Notes : Thank you, Mr. Hamayasu. My name is Tom Heinrich, and I'm chair of the Manoa Neighborhood Board, and I'd like to summarize several main points of discussion that both our neighborhood board, as well as the McCully/Moiliili Neighborhood Board have engaged in for some time. I note especially that while the Ala Moana Center to University of Hawaii at Manoa area would be a Phase 2 or subsequent development, this is a time to address these, of course, in the Draft EIS.

Generally speaking, first, of course, is the effect on University Avenue, particularly by what I'll just call an overhead viaduct. There are other alternatives that do need to be looked at. If that general route is continued to be considered from Ala Moana Center to the university, whether it's Eisenberg or Coolidge Streets, or even going as far as Market City, to use Market City as a different node and a route of connection to the University of Hawaii at Manoa campus.

A major concern as well, is, what should be a unified element of transportation and architecture may become, in fact, again, a most divisive element, as H 1 has served in the 3M, McCully/Moiliili/Manoa area.

Secondly, is, of course, great concern over what I'll call the Varsity station near Puck's Alley, and I especially hold that architect Scott Wilson and others will provide illustrations of what that station at this time would look like, even outside of the context of transit oriented development.

Thirdly, is the absolute necessity of coordinating with the existing Primary Urban Center Development Plan, as well as the other T.O.D. initiatives, both in looking at potential other routes, as I mentioned a moment ago, but also in coordination with the land owners, particularly Kamehameha Schools and the University of Hawaii.

Another main point is that we absolutely have to work with coordination opportunities with the State Department of Transportation concerning the H 1 Freeway and University Avenue interchange area. This is a critical area in which other grade changes. In order to facilitate pedestrian, bicycle, and auto movements in addition to the potential of having rail transit, need to be coordinated, especially in order to avoid a so called fly over far above the H 1 Freeway itself (3 minute limit).

And lastly, the main point that many have brought up, is that if the project in fact is built, that it must end up directly serving the UH Manoa campus and not stop short, makai of H 1, but connect to at least to Dole Street and the Quarry parking structure area. Thank you.

Reply Requested :

Submission Type :

Draft EIS Comment

FOIA (Freedom of Information Request) Request :

No

FOIA Referral Date :

FOIA Response Date :

RECORD # 306 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
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Submission Method : Transcript - Blaisdell
Other Submission Method : Main
Submission Date : 12/08/2009
Submission Content/Notes : Charles Carole. I'm speaking as a private citizen. The DEIS does not present the impacts of the future bus routes and also the number of buses on these routes between Kalihi and Kahala.

Second, the EIS uses the DBEDT 2030 population series, which is much higher than the DBEDT's 2035 population, issued in January of 2008. For example, in 2010, the population projection, based on the 2030 series, is 952,000. In the 2035, it's been reduced to 932,000, 20,000 less. Presently, the July 1st, '07 estimate by the U.S. Bureau of the Census is 905,000. This will have an effect both on the ridership and the cost. Also, our present economic situation, which we will have hyperinflation and devaluation of a dollar, is not taken into effect at all. This will also result in our tourism, people coming in, and also the use of the airport. I think a supplementary EIS should be prepared to answer our concerns. Thank you.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :
FOIA Response Date :

RECORD # 307 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
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Submission Method : Transcript - Blaisdell
Other Submission Method : Main
Submission Date : 12/08/2008

Submission Content/Notes : Thank you. My name is Philip Blackman. I've participated in a number of the hearings at the City Council level regarding this, over the last several years. What I have not seen in the Environmental Impact Statement that I believe ought to be there, is a clear statement of what has not been studied and what is not necessary in the EIS, but that is being left to the City Council and to the state government to be considering during the construction and during the implementation. As a specific example, I was told that there isn't attention given to the impact on the taxpayer for the federal system that will have to be put in place to take all the folks that might go on to the Navy base without cars, that's really the intention of bringing and justifying bringing the rail to the airport location. I'll have to come from across Nimitz, find a way that currently have been accommodated by having hundreds, literally thousands of cars coming each day and finding their own place at Pearl Harbor. To replace that with a shuttle system is a major expense. Just because it can be put in a different budget category, doesn't mean it shouldn't be made visible to people that are ultimately paying it from their tax dollars.

Also, the FTA, I believe, requires the new system to accommodate the same demographic, the same kind of service that's being given by TheBus, which currently remains the bus services. 50 percent of the people on the bus don't have a driver's license. If that's the same percentage that's going to be attracted to the rail ridership to meet the best standards for approval by the FTA, we'll have a problem because it's not going to have but a 50 percent impact on any reduction and congestion.

Also, with the lack of an impact and congestion was made a larger issue, the mayor and the city emphasized transit orient development. In speaking to the support staff outside, they say that's beyond the purview of the EIS, yet something that was so well bound with the whole idea of we should have it, it was almost like take this piece of candy and call it transit oriented development, realize that it could not occur without the rail, and now we're told that it's not something that is being considered (3 minute limit) as its various impacts by the EIS.

So what's not in here, I'm asking to be at least listed very clearly for our policy makers, for our City Council, so they can recognize that it's being pushed on to them and not part of the EIS. Thank you.

Reply Requested :

Submission Type :

FOIA (Freedom of Information Request) Request :

FOIA Referral Date :

FOIA Response Date :

Attachments :

Draft EIS Comment

No

DTS Comment Response Ltr.pdf (22 kb)

RECORD # 308 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
Creator Affiliation :
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Add to Mailing List : None
Submission Method : Transcript - Blaisdell
Other Submission Method : Main
Submission Date : 12/08/2009

Submission Content/Notes : Good evening. My name is Scott Wilson. I am an architect and planner in private practice. I have two comments regarding this DEIS. First of all, the overall project is supposedly being evaluated, and it should include the segments to the University of Hawaii in Manoa and to the Diamond Head end of Waikiki, since these are part of the system. The environmental impact of these segments on their respected neighborhood is not addressed at all, in the DEIS. For example, I want to show you a simulation that was done by Urban Advantage, of Berkeley. This is a vendor that has been hired in the past by the city, to do simulations of our urban city. This is of the King and University station. There's obviously an enormous impact on the neighborhood, with this proposed system, yet it is not covered at all by the DEIS.

I would urge that the Environmental Impact Statement should cover all impacts of the system in its completed form, and it is not sufficient to start the project with a partial EIS. For this reason, I would say that this document is incomplete and should be rejected at this time. It should be returned to its authors, with the instructions to include impacts caused by all project segments.

Second comment. Section 4.7.3 is entitled "Environmental Consequences and Mitigation." This section consists of a number of photo simulations and a table of visual effects. There is no mention of the actual ground level environment, which will result, by necessity, from the imposition of a 30 to 50 foot wide swathe of concrete overhead. As we all know, the environment under a freeway overpass or off ramp is a degraded one, always in shadow, noisy, dirty, blighted. I would submit that this DEIS is incomplete, on the grounds that it does not contain adequate analysis of the ground level environment which will be created by this project. Thank you.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Draft EIS Comment
No

RECORD # 309 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
Creator Affiliation :
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Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Blaisdell
Other Submission Method : Main
Submission Date : 12/08/2009

Submission Content/Notes : My name is James McManus. Good evening, everybody. I moved here in January of 1989, and I've been looking to help induce rail to be brought to Honolulu, because Honolulu is a very beautiful, blessed place. And I use the transit system and the bus system, which is very good. And lot of people have a fear about the bus system being hurt. It's not. The bus system would be complemented by the rail. And I really feel that the rail should go forward here.

I know by listening here tonight, there's a lot of impact problems with property owners and businesses. But just like any other community, and I come from New York, I know a lot of business people that were put out, because we have in the federal level, what they call right of way. And, you know, that's what happens as progress goes on. And since I've been here, I've seen where the City Council at one time, because of Renee Mancho, our transit money went to Oregon, and they have a rail system up and running on our money that we could have had. And Abercrombie went way out of his way to get it, now he's done it again, and I don't think we should blow this one, because Honolulu is going to need it, and it needs it now.

Because all you need is one accident on the Long Island expressway excuse me, that's where I used to live and it becomes a parking lot. And you're going to have that on the H 1. And even in the local streets, like Ward Avenue, I never saw so much traffic. And, you know, it's building up so big and to the point where it's going to choke itself. And mass transit is an asset to this community, if it takes it. But it has to do the right thing to the people that live here, and this is the people who try to help as many people as it can to make it work, because some people are going to get hurt, unfortunately. But that's transit. It goes in every community across the country, and I really feel Honolulu, the time is now, you have to do it, because in the last debate they had about the last thing with the transit, the students in University of Hawaii were begging to please start it at the university and work out, but they were denied in that.

Now (3 minute limit), I just say to the committee here, that, please, try and make it work, because if it fails this time, Honolulu is in for a real problem of traffic. Thank you. I appreciate it.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Draft EIS Comment
No

RECORD # 310 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
Creator Affiliation :
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Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Blaisdell
Other Submission Method : Main
Submission Date : 12/08/2009

Submission Content/Notes : Thank you very much. My name is Mike Uechi, I'm a practicing physician. Yesterday, I was pleased to read the Honolulu Rail Transit, the street pamphlet that was passed out in the newspaper, and the first thing they addressed was, how does rail transit help reduce traffic congestion. So it says here, that by 2030, an addition of 750,000 more daily trips are expected on Oahu's roads. That impacts H 1 because I believe in 2030, we're going to be over capacity by 81 percent.

But the thing that blew me away, was the fact that they announced that rail will reduce traffic by 11 percent. So just my simple math, we were over capacity by 81 percent, and you reduce it by 11 percent. So when you're stuck in traffic, by 81 percent and you reduce it by 11 percent, and paying \$6 billion and you're still stuck in traffic, that's a significant problem, so my question is, what happens in 2030, when the people in the Leeward corridor and also the Central Oahu corridor are still stuck in traffic, except worse in 2030. So we need to be addressing the problem right now, before the situation happens.

The second thing about this Honolulu rail is, how do we expect to pay for it? From what I understand, we don't have a penny yet from the federal government, and the first penny is going to arrive in 2011, which is three years from now. So when you say we got guaranteed 925 million in the kitty, and we don't have a penny right now, what happens when that money is no longer present? Who is going to guarantee that we're going to have anywhere close to 1.2 billion that you expect? Secondly, since we are in a recession right now, what happens when we don't have the revenues that are backup of excise tax? What happens when both of these source of revenues don't pan out? I'm going to ask the question, what happens, then, when we cannot afford to pay it? The only source of revenue we have right now is property taxes, and if we don't have income, that's where we're going to have more trouble. Thank you very much.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :
FOIA Response Date :

RECORD # 311 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
Creator Affiliation :
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Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Blaisdell
Other Submission Method : Main
Submission Date : 12/08/2009

Submission Content/Notes : Good evening. My name is Michelle Matson, and I guess you could say I have a family interest in a historic property deeded to the state, in trust, in care of the public trust, along the proposed route of this vehement blight.

One of the most significant adverse impacts of the proposed elevated steel on steel heavy rail system is the irreparable blight, it will implant through the vital heart of downtown Honolulu, the Waterfront and beyond. This obtrusive blight will impact four protected registered historic sites along the proposed Waterfront route, specifically Aloha Tower, Irwin Park, the Dillingham Transportation Building, and Mother Waldron Park.

Because of the city's requirement for federal funding for the proposed elevated rail project, there must be compliance with Section 106 of the National Historic Preservation Act and Section 4(f) of the Department of Transportation Act. It will therefore be taken into account that such elevated infrastructure blight would be, quote, visually incompatible and block the view of the historic resource; that is, the scale of the infrastructure would overwhelm the resource's historic appearance, and would cause the loss of integrity of setting, feeling and association of these historic sites. The historic view planes to the harbor from Bishop Street and the Chinatown Historic District will be similarly impacted.

It would therefore be a fatal mistake for Honolulu's future if the city forces the intrusion of elevated transit blight on the Honolulu Waterfront and the mauka makai harbor views. If the Downtown Honolulu Waterfront is allowed to be impacted by the fatal mistake of elevated guideway structure, the vital visual, and indeed historic, character and integrity of the waterfront centerpiece of downtown and the harbor entrance to Honolulu will be lost. One only needs to consider the blight created by the Embarcadero Freeway along the San Francisco Waterfront, and the universal public elation when it was torn down. It is time that the City and County of Honolulu learns by the mistakes of others before it is too late.

The city also proposes to slam the elevated heavy rail route through Kaka'ako adjacent to another registered historic site, Mother Waldron Park on Halekauwila Street, diminishing its historic character and integrity, and usefulness and attraction as a vital recreational open space for today's growing population. The revised Kaka'ako Mauka master plan designates Halekauwila Street and its extension to Kamake'e Street as a significant promenade street, a pedestrian friendly boulevard with wide tree lined sidewalks and new human scale residential neighborhood (3 minute limit).

In conclusion, there are very serious public concerns surrounding the city's disregard and neglect of the significant adverse impacts of an elevated transit route along the Honolulu Waterfront specific to the historic sites. This badly planned project cannot be allowed to overshadow and overpower these significant historic sites or destroy the visual character and integrity of the vital Downtown Waterfront. Thank you.

Reply Requested :

Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :
FOIA Response Date :

RECORD # 312 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
Creator Affiliation :
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Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Blaisdell
Other Submission Method : Main
Submission Date : 12/08/2009

Submission Content/Notes : Good evening. I'm Katherine Kupukaa, and my choice is to don't build, only because the most viable alternative was HOT lanes, and that was eliminated in the alternative analysis. I guess the authors of the Environmental Impact Statement didn't realize how Kamehameha Highway is the only highway from Central and Leeward Oahu, other than the freeway, and during peak hours, the three lanes going westbound in the afternoon is just jam packed, also buses going, taking the right hand lane, so I can't see you would remove two lanes in the medial, to make way for this train track.

What citizens are frustrated and complaining about, is the congestion, and this will not eliminate the traffic congestion that is, you know, currently going on, on the H 1 Freeway. And for the past couple months I've been catching the bus, but you can't the bus for instance, today, I caught the bus from Mililani, and the bus was half an hour late, so we had to get off the bus on Alapai Street and catch another bus, and so I was supposed to be here by six o'clock. And so my frustration is that, in Mililani, I have to walk half a mile to the bus stop. If I were to catch the train, I would catch the No. 52 and go all the way to Leeward Community College to catch a train. I don't think you people who don't catch the bus realize that you have to wait half an hour here, half an hour there. Like today, I caught the bus in the morning and I could accomplish only two of my errands, but I just have to go home because I had to be here tonight to testify.

There are other concerns that I have, and I brought this up at the last transit meeting, and till this date, it was never answered. I posed the question of the bus ridership from Leeward Oahu to Ala Moana Shopping Center (3 minute limit), because why are we building this train if there aren't there's not going to be the ridership going from Leeward and Central Oahu to Ala Moana Shopping Center, and even to the University of Hawaii. This is my concern anyway. Thank you.

Reply Requested :

Submission Type :

FOIA (Freedom of Information Request) Request :

FOIA Referral Date :

FOIA Response Date :

Draft EIS Comment

No

RECORD # 313 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
Creator Affiliation :
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Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Blaisdell
Other Submission Method : Main
Submission Date : 12/08/2009

Submission Content/Notes : Good evening. My name is Bart Travaglio, and I've been very fortunate to be employed with the travel business here in Hawaii for the last 35 years. I spent a lot of time on motor coaches. I don't think enough service has been given to a bus service, an adequate bus service and one that runs efficiently. I'd like to pose this question to you: How many of you people have come here tonight on the bus? That person, how many will ride the train?

On this island, people don't ride trains. I spend on a bus with 50 people. I apologize for the exhaust, but our perfect footprint, individually, is rather small. But, I look at the road, on the freeway during the middle of the peak hours. One person in a car. One person in a car. I travel the other way, two people in the HOV lane.

You want an answer to your system, try making the bus more efficient. It will be much more economical. The new buses they could bring in, don't make them like the city buses. Put them like the passenger buses that I take to work. Fifty seats, comfortable. You get on the bus, you could do work on the way into our office, and you go home. Problem is, people don't just go to their office. From their office, they go here, they go there, they go here, they go there, they do it on the way in, they do it on the way out. They're going to be doing the same, when you spend a billion dollars on a train.

It's not in the mind of the people here to take it, but if you make it convenient, it could work. If you put 50 buses more out there, that whole 50 people, and you put the buses in the HOV lane with 50 people on them instead of two, it could work. If you make your system designed so the timing is as effective as it is in Switzerland, people will know the buses are going to be here. And for the other people that said this, and it's just the frustration, buses will work, and you gotta give 'em a chance. And when you bring the new buses in, you power them with propane. There's tons of it, and it's cheap. Your cost of your train, electric, how are you going to produce the electric? Our best hope for something like that, is to get one of the retired nuclear subs, put them in Pearl Harbor and furnish the electricity for this site. That's actually our best hope. Okay? But, otherwise, you gotta make the electricity to power the train (3 minute limit). Thank you, ladies and gentlemen. I appreciate your listening.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Draft EIS Comment
No

RECORD # 314 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
Creator Affiliation :
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Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Blaisdell
Other Submission Method : Main
Submission Date : 12/08/2009
Submission Content/Notes : Hi. My name is Kevin Killeen, and I agree with guys who say there's no best service. Improve the first rate bus service. I'm also concerned about the propaganda that's used, the claim that the traffic will be reduced, future congestion. Because the media is a little bit lazy, they reprint stuff like that a couple days before the election, and I think people should realize traffic is going to be a lot worse. And the other propaganda claiming that the Sierra Club endorses the train, that might be true that they had a national report, but the local Sierra Club said they support it if certain conditions are met. They wanted the at grade level. They wanted downtown service, U.H. service first, and they wanted it done in light rail, not heavy rail. So I believe the executive board of the Sierra Club notified DTS that they don't have a position of supporting the rail. And I see that they're still implying that in these brochures that they're handing out, so, I don't blame DTS. That's the contractors that you have, working for you. But I'd appreciate it if they made it clear that traffic is going to be worse with the rail, and that Sierra Club did not endorse the rail. Thank you.
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :

RECORD # 315 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
Creator Affiliation :
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Last Name : O'Donnell
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Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Blaisdell
Other Submission Method : Main
Submission Date : 12/08/2009

Submission Content/Notes : Aloha. I'm Gary O'Donnell. I have a master's in urban design from Pratt Institute, and I have lived and worked in Honolulu since 1985. Overall, I support the system and I thank you for your work on the EIS. However, I would support a different system over the route chosen, such as Vineyard Boulevard. This would help address some of the issues with going past historic sites, and the downtown area, and Chinatown, and it would also alleviate some of the issues of the visual impact along the Waterfront.

I think there should be a secondary system, on grade, that will take people with more stops in the inner cities, such as on Hotel Street. And since we are a tourist destination and we get a large part of economy from tourism, we should have it go to the airport first, rather than Salt Lake, and I would prefer that we start this system in the downtown area.

I understand one of the problems is getting 40 acres of land near the downtown area, where the construction lay down area. I would suggest taking a look at Shafter Flats, if you haven't done so already, or possibly swapping out the park along Lagoon Drive there, as you approach, come out under the viaduct on Nimitz.

Basically, we're not going to have enough room to put all the cars on the road in 50 years from now. Population keeps growing, the way it has in the of the last 50 years. And the cost, the \$4 billion, when I hear about the hundreds of billions of dollars being spent in Washington, D.C., it's really a small amount, even if it went to \$8 billion, I would still support the rail, and thank you very much. I appreciate your time and your effort on this.

Reply Requested :

Submission Type :

FOIA (Freedom of Information Request) Request :

FOIA Referral Date :

FOIA Response Date :

Draft EIS Comment

No

RECORD # 316 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
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Add to Mailing List : None
Submission Method : Transcript - Blaisdell
Other Submission Method : Main
Submission Date : 12/08/2009

Submission Content/Notes : Richard Kawano, and my address is 1420 Victoria Street, 803. I'd like to speak in support of the project. I've lived here since '64. I have concerns. I've listened to the people who have concerns about the cost, but I voted for it during the election, as the majority of us did, and I do believe it's necessary, it's not a magic bullet, I know it's not going to solve all the problems, but with the traffic congestion, with the population that's going to be going on, we need to give the people a fair alternative. And President elect Obama is talking about large infrastructure problems and you gotta look at it from the economic point of view. You know, less tourists are coming here, we're going to be impacted by that, and they're talking nationally about major infrastructure improvements across the country, and as an economic stimulus for a lot of these areas that are being severely impacted by unemployment and those things there, so it will be I think it's going to be good for the economy. I think it will have a positive impact on transit time for people who have to come in from Kapolei, all those houses out there.

I live right here in town. I'll never be using it, but I still think, as a community, we need to support this thing, not just and then we've built H 3. So I do strongly support the project, and I hope it gets started. The sooner we get this started, the less expensive it will be for all us taxpayers. And, finally, this needs to be done with excellent management. This project needs to come in on time and on budget, you know, in the worst case scenario, if it takes significantly longer and if it ends up double or triple, like H 3 did. So the opponents have to be listened to, and their concerns have to be addressed. Thank you very much.

Reply Requested :

Submission Type :

FOIA (Freedom of Information Request) Request :

FOIA Referral Date :

FOIA Response Date :

Draft EIS Comment

No

RECORD # 317 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
Creator Affiliation :
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Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Blaisdell
Other Submission Method : Main
Submission Date : 12/08/2009
Submission Content/Notes : Good evening. I'm Eve Anderson. My address is P.O. Box 25550, Honolulu, 96825. I'm concerned that the public, general public that's concerned about this project hasn't had time and will not have time to read the document. I just picked up one tonight. I'm wondering if there is a possibility for you to push the deadline out to, let's say, February 7th? Let everybody get through the Christmas holidays and New year's and things.

And I'd really like to have you, as our expert, to go on T.V. and talk about the document. You can do maybe five presentations, take them section by section so more people can understand it, 'cause there ain't gonna be very many people in the general community that will get a document, or go to the library, or sit in front of a computer for 400 and some pages worth. I know during the earlier times, you had a lot of ads on T.V. and radio, and doing all this to inform the people, so I think it would be very time and money well spent if you or somebody who designate an expert to discuss this document that's huge, so that's my concern.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :

RECORD # 318 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
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Zip Code : 96734
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Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Blaisdell
Other Submission Method : Main
Submission Date : 12/08/2009

Submission Content/Notes : My name is Robert Crone. My address is 218 Kuupua Street, in Kailua. First, I want to say that I support the position of the American Institute of Architects. I think in addition to the oral testimony given, there are some very good information in their written testimony that we should take heed of. The point that I would like to bring out today, is that Honolulu, according to the U.S. Census, is the 52nd largest city in the United States, as far as metropolitan population, and 47th largest city with relationship to its urban population. Unlike some literature that was put out in relation to the transit, there are no cities smaller than Honolulu that built rail transit systems. All the cities are larger than Honolulu.

The third rail systems, like we're contemplating here, which does not allow at grade, have been built by maybe cities in the top 12 cities in the country. All the cities between that point and where we are down in No. 50, have built light rail systems. They built systems that have overhead wires rather than the third rail, which allows them to be overhead at grade or underground. And they've all put them primarily at grade, with some places overhead or underground or they needed to, in order to pass freeways and things like that.

I think it's physically and totally irresponsible for us to think that, as the 52nd largest city in the country, our population can afford to support a system of this kind, of a grade separated system and the extra expense. The at grade system is much more economical and why it's been chosen by approximately 20 cities, between the 12th largest and the 50th largest.

I think that regarding the construction, regarding the operation of it, and regarding the maintenance of it, these are going to be financial burdens that our community is going to have for many, many years, and we are burdening ourselves, our children and our grandchildren with this thing, and I think that in the future, it would just always be seen as something that, financially, bankrupt has been noted. Thank you.

Reply Requested :

Submission Type :

FOIA (Freedom of Information Request) Request :

FOIA Referral Date :

FOIA Response Date :

Draft EIS Comment

No

RECORD # 319 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
Creator Affiliation :
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Add to Mailing List : None
Submission Method : Transcript - Salt lake
Other Submission Method : Secondary
Submission Date : 12/09/2009
Submission Content/Notes : We're residents of Foster Village, and we think that the Salt Lake route is pretty dumb because it's going to go by all the schools, Makalapa Elementary, Radford High School, and it's not going to help people in Foster Village. It's just going to make noise for us, and while they're building it, it's going to cause a lot of trouble for traffic to get in and out of Foster Village, and we think it should go along Kam Highway, so it goes by the Pearl Harbor Complex, and the Hickam Air Force Base, and the airport. That makes a lot more sense to me.
Oh, yeah, I said the schools. Yeah, Radford High School and Makalapa Elementary School are going to be bothered by this thing, during the building and, also, it's going to be making a lot of noise for those schools, when the trains go through. And it makes a lot more sense to use Kam Highway. That's where the people I've talked to several people who work at Pearl Harbor, they said they'd rather have it go to Pearl Harbor, along Kam Highway. That's about it.
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :
FOIA Response Date :

RECORD # 320 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
Creator Affiliation :
First Name : Herbert T.C.
Last Name : Loo
Business/Organization :
Address : 1569 Onipaa Street
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96819
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Salt lake
Other Submission Method : Secondary
Submission Date : 12/09/2009
Submission Content/Notes : I'd like to testify that this project should have been built many years ago, and it is a sad situation when we still have these few people bringing up this "if" and "or" about this particular project, which is long overdue. Of course, probably a lot of them haven't traveled to see other parts of the world, to see how the transit of people moving around by the millions are using this type of transportation, economically, safe, and, best of all, you get there in the least amount of time. And I say that we should proceed with this, with the fastest means possible and get it done, and then you'll know and appreciate what a real transit system is like.

I lived in New York City for seven years, and you'd just imagine if they didn't have the subway there. Boy, a million people travel on that every day, and it's a snap. Just think if we had this 20 years ago, boy, everybody would be less humbug with this traffic mess that we have now. That's my testimony and I hope we get this thing built as soon as possible.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :
FOIA Response Date :

RECORD # 321 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
Creator Affiliation :
First Name : Lennard Pepper
Last Name :
Business/Organization : 1352 Olino Street
Address :
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96818
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Salt lake
Other Submission Method : Secondary
Submission Date : 12/09/2009

Submission Content/Notes : I will not duplicate much of what I testified in public. However, in order to make sure that certain important things get recorded, I'd like to say that in the EIS, I think it's in 16, there were some major facilities left out. These include the Bougainville industrial area, which is an area of both retail and wholesale facilities, and we'll have a Target, as of March of next year. The Moanalua Shopping Center, the Stadium Marketplace the Pearl Harbor commissary and the Public Work Center, those are both military so those are left out.

In addition, I feel that the document itself is kind of static and does not recognize many changes which will occur in this community by 2030. It is an aging community, it is a community that will become poorer because the infrastructure is aging. In fact, Foster Village was begun in 1957, so it will be 80 years old, roughly 80 years old by 2030. Salt Lake, I think, was started over 30 years ago. It will be an aging infrastructure and an aging population. They, the aging population, will need public transportation.

The document also does not recognize changes which I anticipate in the public school system. There are five public schools along the route, at least two of them high schools. They are likely to become magnet schools by 2030, schools which specialize in one particular kind of instruction; for example, drama or English, and kids from all over the city will be coming to those schools because they will specialize in that particular function. They'll need public transportation. This is all in conjunction with my support for the Salt Lake route. In addition to that, the EIS does not seem to have, at least the part I read, does not have clear indication of what the feeder system, the feeder bus system is going to look like. I think that's an important thing that should be included in the final EIS.

It also is not very clear about the property acquisitions which will be necessary. It was my understanding that many properties would require only a very small strip of land be taken. When the opponents talk about this Salt Lake route, they talk as if it's going to be the whole property is going to be taken instead of, say, three feet or two feet from a yard, or carport or something.

The other thing that I guess I did not make as firmly as I should have, during the public testimony, was that the Salt Lake route enables a seven day a week system serving the population. Going to church, going to Aunty, going to soccer games. Whereas the airport route is basically a five day a week, "go to work and come home" system. Something I said in the public hearing, when we were talking about starting this whole thing, was taken sort of as a joke, but it wasn't meant as a joke. One of the social benefits of this thing would be getting drunks off the road. Some people who like to drink to excess will take the public transportation rather than drive drunk, and I think that's a valuable and important social benefit. So, in summary, the social benefits of the system are not adequately dealt with, in the EIS, as far as I'm concerned, and they matter at least as much as getting people to work and at least as much as the cost of the system. That will do it. Thank you.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :
FOIA Response Date :

RECORD # 322 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
Creator Affiliation :
First Name : Ruth
Last Name : Boyett
Business/Organization :
Address : 4336 Laakea Street
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96818
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Salt lake
Other Submission Method : Secondary
Submission Date : 12/09/2009
Submission Content/Notes : I think a static lane would look much nicer to go down Kam Highway and Nimitz. I think the view would be much nicer. I live on Salt Lake Boulevard. I don't want to have it pass on my front yard. That's all.
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :
FOIA Response Date :

RECORD # 323 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
Creator Affiliation :
First Name : Dennis
Last Name : Egge
Business/Organization :
Address : 2920 Ala Ilima Street
Alternative Preference :
Apt./Suite No. : #703
City : Honolulu
State : HI
Zip Code : 96818
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Form - Salt Lake
Other Submission Method : Secondary
Submission Date : 12/09/2009
Submission Content/Notes : I believe that we should build out from Ala Moana Center or the Honolulu Convention Center area out to Middle Street, to take care of all the congestion in town. And from that point, west, I think things can be taken care of by existing TheBus and surface transportation, but I think things really get jammed up, the closer you get into town. Like one guy tonight said, what used to be a ten minute ride from Salt Lake to Queen's Hospital is now 90 minutes. So we won't be able to tolerate that much longer. If the Mayor would consider building out from Ala Moana Center, shopping center area, which is a major transit oriented development at the moment, out to the Middle Street terminal, then I think they will have something. Thank you.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :
FOIA Response Date :

RECORD # 324 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
Creator Affiliation :
First Name : Kenneth
Last Name : Tsumoto
Business/Organization :
Address : 3434 Ala Ilima Street
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96818
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Salt lake
Other Submission Method : Secondary
Submission Date : 12/09/2009
Submission Content/Notes : They should get one committee and just vote on it, you know, and include a monorail one place. If they already agreed on Salt Lake, then why are they going over and over again? You know what I'm saying? Just get one panel of people just to decide it. Instead of going to you know what I'm saying going to one place to, basically, another place, that, I cannot see. Because remember what happened to the Aloha Stadium and the lawsuit? The engineers were suing the Aloha Stadium, and the engineers on their side always answered the question. But when the other side bring up the question, famous answer, "I don't remember." So what I'm just saying is that this is the same thing what's happening now. So, you know, that's the ball game.
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :
FOIA Response Date :

RECORD # 325 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
Creator Affiliation :
First Name : Glenn
Last Name : Oamilda
Business/Organization :
Address : 91-1179 Puamaeole Street
Alternative Preference :
Apt./Suite No. : #24V
City : Ewa Beach
State : HI
Zip Code : 96706
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Waipahu
Other Submission Method : Secondary
Submission Date : 12/10/2009

Submission Content/Notes : I'm opposed to the rail, as it is, the proposed city, simply because, No. 1, it's not environmentally friendly. In other words, it's concrete in the sky. And the highest point on that rail, the way they got it designed, is about a seven story building, the highest point, 80 feet. So I don't think that's environmental friendly. Plus, the condemnation, the city condemnation for people in Waipahu especially, where I'm from, and especially in Ewa Beach, I think it's going to do harm to the elders and the old people that have accustomed to living in this kind of environment.

And the other thing, too, where the rail is going to start from, east Kapolei, it's ag. land. And I think that's No. 1 priority where we should preserve agriculture land. So that's where the start is going to be. Plus, not only that, the Ewa development plans does not call for a transit. The Ewa development plan does not call for a transit, a rail transit in the second city on the Ewa Plains, so that's why I'm opposed to it. Plus, I don't think it will relieve traffic. By 2030, they said it's going to be only 20 percent reduction, 20 or 23 percent, and I think that's a small number. I think that's really a small number to be dumping all that money into a system that's going to be eventually borne on the public, the cost is going to be borne on the public.

The other thing, too, is the maintenance of that system, I don't think the public is ready to maintain that system for the longevity of the rail, in perpetuity. And I don't think that's fair to have the public bear the cost of the rail.

So those are the three things, and I'm really opposed to, No. 1, again, is the cost; No. 2, is the environment; and No. 3, I don't think it will relieve traffic, you know, but what the alternative designation mitigation said it will, it would deter the traffic, I don't think that's a fair assessment. Plus, in this economic downturn, I think the money should be wisely spent on our roads and our sewer. The EPA has fined the city a billion dollars to upgrade the system, the sewer system, to complete the total secondary treatment, and the city have reneged on that idea. And of course the roads, the roads are critical to the communities. So those are the other things that I totally oppose to the rail. So, that's it.

I was born and raised in Waipahu, and I now live in Ewa Beach.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Draft EIS Comment
No

RECORD # 326 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
Creator Affiliation :
First Name : Michael
Last Name : Burton
Business/Organization :
Address : 2889 Ala Ilima Street
Alternative Preference :
Apt./Suite No. : #16A
City : Honolulu
State : HI
Zip Code : 96818
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Waipahu
Other Submission Method : Secondary
Submission Date : 12/10/2009

Submission Content/Notes : Well, first off, I just wanted to say that I do support the rail, and I think it's a necessary utility, you know, coming in from the corridor of Kapolei to downtown and onward to U.H. I was listening to a lot of talk radio in regards to changes that Councilman Djou was recommending, and he did say that he wanted to see the rail start, the project start somewhere in Pearl City Aiea rather than all the way out by Kapolei, and I think that's a wise part, a wise insight on his part, because it's a better use of public's money. The reason why, is because from Pearl City going into town, that's where you pick up the majority of the riders. So with that, you'll get higher usage out of it, and as you build that portion and going into town, after you complete that, and hopefully you don't run out of money in the process because nothing has been a hundred percent guaranteed, after that portion is completed, then we can go back and finish the Kapolei and phase of the operation.

The one thing I was in objection to, was, is routing of the rail through Pearl Harbor to the airport. I feel that it should go through Salt Lake, and the reason why, is because there's a dense population of people in the Salt Lake area and along that route, that can take better advantage of the rail, if was stopped, conveniently adjusted for them, to meet their needs.

One of the things that I did notice in the Salt Lake route, is that there's only one stop, at Aliamanu, I believe that's what it is, Aliamanu Salt Lake, that stop right there. Whereas the Pearl Harbor route has three. Now, in my opinion, if they decide to go with the Salt Lake route rather than the Pearl Harbor route, could one of those stops, the Arizona Memorial stop, be transferred over to Salt Lake, somewhere in between, I think it's Radford High School, Foster Village, put a stop right over there, that's the Bougainville industrial area, and then continue on to Salt Lake and then onward? Because that whole Foster Village is kind of left out, it's just passed over, with the rail, and I think with a stop in that area, it will better support the whole rail system.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Draft EIS Comment
No

RECORD # 327 DETAILS

Status : Initial Action Needed
Creation Date : 1/5/2009
Creator Affiliation :
First Name : Tit Kwong
Last Name : Chun
Business/Organization : Retired Engineer
Address : 2646B Haili Road
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96813
Email : tkcassocia@aol.com
Telephone : 808-5336168
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 01/05/2009
Submission Content/Notes : The light rail system should be built first from Waipapu to Ala Park area. The reason is to relieve the present unbearable traffic bottleneck in the Middle Street portion of H1. This is the main reason for the rail system for the City of Honolulu. After we built this portion of the rail system, then we should plan for an underground system for downtown Honolulu. Build a right rail system we can all proud of! Not an ugly elevated overhead system through downtown Honolulu and Waikiki. Perhaps President Obama will help his native land to fund this rail project.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 328 DETAILS

Status : Initial Action Needed
Creation Date : 1/6/2009
Creator Affiliation :
First Name : K. Mark
Last Name : Takai
Business/Organization : State House
Address : State Capitol
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96813
Email : reptakai@capitol.hawaii.gov
Telephone : 8085868455
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 01/06/2009

Submission Content/Notes : January 5, 2009

The Honorable Wayne Yoshioka
City Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Dear Director Yoshioka:

The Kamehameha Highway Improvements Project Task Force is a group of elected officials, business leaders, and community groups that have a common goal to make traffic, safety and aesthetic improvements to the highway while still maintaining a sense of culture and place. The project focuses on the highway from Waihona Street (Sam's Club in Pearl City) to Center Drive (Pearl Harbor Naval Base).

This group began formally meeting since February 2005 after the State Legislature appropriated an initial \$1.2 million for this effort. Since our initial meeting, we have continued to meet quarterly to discuss our plans for the corridor and identify short-, mid- and long-term projects that will improve and enhance this stretch of the highway.

At our December 10, 2008 meeting, a presentation was made on the Honolulu High-Capacity Transit Corridor Project. We learned that the rail project would utilize the median of Kamehameha Highway through the Aiea-Pearl City area.

While we continue to support the City's effort to provide reliable and effective mass transportation options to meet our City's growing needs, we are wary of becoming merely a corridor for travel for non-residents of Aiea-Pearl City. For example, we are quite concerned about the impacts that a visually-intrusive viaduct may have on our plans to improve the aesthetics of the area, our sense of community pride, and our community's cohesiveness.

At the December 10 meeting, the Task Force reached a consensus on several issues that we would like you, Mayor Mufi Hannemann, your Transit Team, and the City Council to carefully consider when evaluating the mass transit options. The issues the Task Force would like you to consider are:

- We request that remaining overhead utility lines on both the mauka and makai sides of the corridor (such as the mammoth 138 kV lines) be incorporated into the transit viaduct structure. The removal of these massive overhead power lines would help mitigate the further visual degradation that would result from the transit viaduct. Using the transit viaduct to carry all overhead utility lines may provide some aesthetic mitigation at a cost far cheaper than undergrounding the overhead utilities.
- Placement of the transit viaduct down the median of Kamehameha

Highway through our community should be accompanied by meaningful beautification improvements at grade within the median. A cohesive median beautification program would help mitigate the visual intrusion of the viaduct while fostering community pride and cohesiveness.

Attached please find a list of the Kamehameha Highway Improvements Task Force membership. Those members who were present at the December 10, 2008 Task Force meeting are noted. Thank you for considering this input.

With warmest aloha,

Representative K. Mark Takai
Co-Chair, Kamehameha Hwy Improvements Task Force

cc: Mayor Mufi Hannemann
/Attachment

Reply Requested :
Submission Type :
**FOIA (Freedom of
Information Request)
Request :**
FOIA Referral Date :
FOIA Response Date :

Yes
Draft EIS Comment

RECORD # 329 DETAILS

Status : Initial Action Needed
Creation Date : 1/6/2009
Creator Affiliation :
First Name : Arnold E.
Last Name : Widder
Business/Organization :
Address : 1888 Kalakaua Avenue
Alternative Preference :
Apt./Suite No. : #1105
City : Honolulu
State : HI
Zip Code : 96815
Email :
Telephone : 808-979-2007
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Kalihi
Other Submission Method : Main
Submission Date : 12/11/2009

Submission Content/Notes : MR. WIDDER: Mr. Hamayasu, since -- number 1, since the EIS draft concluded taht the rail could --

HEARING OFFICER HAMAYASU: Please state your name for the record.

MR. WIDDER: Arnold E. Widder, W-I-D-D-E-R.

HEARING OFFICER HAMAYASU: Thank you.

MR. WIDDER: Number one since the EIS draft concluded that the rail would cut traffic by only 1 percent and since there couldn't be a worse time to burden local taxpayers with probable increases to excise taxes to pay our billions of dollars of steel rail debt, I'm still against the rail system. I'm concerned that the expensive media advertising of how great the rail system was overwhelmed the voters.

Number two, a vote was taken and seems to be irrevocable, however, I pray that the airport and UH will be placed back into the original plans and Salt Lake will becoe the spur. The only reason why Salt Lake was submitted was because the Salt Lake Councilmember coerced the mayor to adopt it or lose the steel rail system that the majority of councilmembers did not originally want.

Number three, has anybody publicly showed concern that if Hawaiian bones are found in the pathways that it would greatly slow down the process.

Number four, the Honolulu mayor is presently trying to get millions of dollars for very worthy public works projects. If the federal government gives Honolulu a major funding for our rail, I believe they will give us far less for our other comunity work projects which will probably go to other needy citizens.

Thank you.

To other needy cities.

HEARING OFFICER HAMAYASU: I'm sorry, would you like to state that so that she can hear it?

MR. WIDDER: I think I said citizens, I meant cities, to go to other needy cities.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Draft EIS Comment
No

RECORD # 330 DETAILS

Status : Initial Action Needed
Creation Date : 1/6/2009
Creator Affiliation :
First Name : Robert
Last Name : Wong
Business/Organization :
Address : 4530 Waikui Street
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96821
Email : robertdwa@hawaii.rr.com
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Kalihi
Other Submission Method : Main
Submission Date : 12/11/2009

Submission Content/Notes : MR. WONG: Good evening. That was fast. Thank you for the opportunity to listen to my comments. I appreciate everybody's work in putting all this information together. It's quite staggering. I did attend one town meeting with the mayor, so I'm a little bit informed but not quite totally. I've lived in New York City for almost ten years and I used the metro NTA, New Jersey transit path, metro north, and I have a degree in quality control, so I think it's -- I don't have actual experience in urban planning or transportation industry, but my theory kind of helped me formulate my thoughts.

The mayor said that the system would be mostly built at elevation versus at grade as a result of public consensus, and they didn't want to sacrifice the existing lane or two to locate the train tracks, and he also signaled that the system would have to work with the bus authority in order to execute a smooth process getting people to and from the trains. I have two concerns that I would like to address.

Based on what I've read in the newspapers and the web site, the total cost of the project seems to generate a lot of conflict, and I hear people saying that it's cost prohibitive versus the City government's position that the costs are manageable. In any event, there's -- the amount of information is way too much, I think, for the normal citizen to process and digest. I would like to see a greater portion of the system be built at grade to bring the costs down and with the assumption that building it at grade is going to be more cost effective.

A kind of contingent benefit, as I see it, to that using city or state roadways, particularly where four to six lanes exist in the same direction. So if you brought that down to two or three, you're going to force one cars off of the road. Of course, this is a consensus issue as well as a fiscal one, but I hope there can be some kind of compromise.

The second thing is a little more important, and I --

(Buzzer sounds.)

HEARING OFFICER HAMAYASU: Please summarize.

MR. WONG: I'll send them in. Thank you.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Draft EIS Comment

No

RECORD # 331 DETAILS

Status : Initial Action Needed
Creation Date : 1/6/2009
Creator Affiliation : Other
First Name : Russell
Last Name : Holman
Business/Organization :
Address : P.O. Box 1201
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 00000
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Kalihi
Other Submission Method : Main
Submission Date : 12/11/2008
Submission Content/Notes : MR. HOLMAN: My name is Russell Holman and I have a P.O. Box, 1201, Honolulu, Hawaii. I'm a transportation consultant. I'm sorry for not being prepared to have a written testimony, but I have a few concerns regarding the infrastructure needs since we are at the Bishop Museum today I'm more concerned about the alignment going through Dillingham. As you look at it, I notice there's a lot of utility poles in the corridor, soe of these KV lines and all that. But in the process I know there is a lot of median work to be done when you're doing the fixed guide rail construction. Somehow if they can put those utility lines and telephone lines underground liek some of these places like east Honolulu, I think that can beautify in terms of beautification of this neighborhood as well. Because when you're riding the bird's eye view in the fixed rail, you don't want to see all of these telephone lines, you know, with wires all the other stuff. And overall with the alignment if they can somehow get the utility lines as well and bring it underground, I think that might beautify the riders as well and the infrastructure needs.

Thank you.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request : No

RECORD # 332 DETAILS

Status : Initial Action Needed
Creation Date : 1/6/2009
Creator Affiliation :
First Name : William
Last Name : Froelich
Business/Organization : Colliers
Address : 2572 LEMON ROAD
Alternative Preference :
Apt./Suite No. : 1105
City : Honolulu
State : HI
Zip Code : 96815
Email : wfroelich@hotmail.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 01/06/2009
Submission Content/Notes : Is there any info available on what areas may be subject to a zoning change? I have a home near a planed rail area and would like to know.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 333 DETAILS

Status : Initial Action Needed
Creation Date : 1/6/2009
Creator Affiliation :
First Name : Michael
Last Name : Burton
Business/Organization :
Address : 2889 Ala Ilima Street
Alternative Preference :
Apt./Suite No. : #16A
City : Honolulu
State : HI
Zip Code : 96818
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Salt lake
Other Submission Method : Main
Submission Date : 12/09/2009
Submission Content/Notes : My name is Michael Burton. I live here in the community. I work at the airport. Okay. I just wanted to say that I do support the rail project, however, the latest discussions that I've been hearing was changing the route, and I think it's a waste of public's money to route the rail down from Pearl Harbor toward the airport. My rationale is because that it's bypassing densely populated neighborhoods, such as Foster Village here at Salt Lake, and I think public's money could be better used by routing it down Salt Lake rather than going toward the airport.

Secondly, in that route toward the airport you're going to be intruding on a lot of military property, which means you're going to have to get third-party permitting and whatever that process might be to get the okay to build your infrastructure on their property. And, therefore, I think it's going to be -- that's going to create a lot of delays in the forward motion of this project.

Routing it down Salt Lake, because it is a lot of city and county land along that Salt Lake route there will be very little problems as far as intruding on personal property and federal property and what have you in that area. Like I said, it will benefit the Foster Village community as well as Salt Lake community. That's it.

Reply Requested :
Submission Type : Draft EIS Comment

RECORD # 334 DETAILS

Status : Initial Action Needed
Creation Date : 1/6/2009
Creator Affiliation :
First Name : Robert
Last Name : Webb
Business/Organization :
Address : 5320 Likini Street
Alternative Preference :
Apt./Suite No. : #6
City : Honolulu
State : HI
Zip Code : 96818
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Salt lake
Other Submission Method : Main
Submission Date : 12/09/2009

Submission Content/Notes : MR. WEBB: First I would like to thank you for allowing me to express my viewpoint on the issue.

HEARING OFFICER HAMAYASU: Please state your name first.

MR. WEBB: My name is Robert Webb. I'm a 28-year resident of Salt Lake.

I Robert Webb oppose the Salt Lake route for the following reasons:

Number one, I feel very strongly the schools that would be involved are the Radford High, Aliamanu elementary and middle schools should not be uprooted in any way, shape or form. I feel the students should not encounter any difficulty in their learning when a link is being built and when it's open for service. And for the same reason I feel the Salt Lake Library should not be touched, okay.

Thirdly, I -- you might think I'm a little paranoid or what, but I don't care. I think that if we have a substation in a highly, densely populated area, we are going to have a real social problem on our hands and that is a lot of homeless people will take shelter at a substation, and I'll be damned if some of our kids are getting woo'd by types like that and they might get involved in some kind of illicit activity like drug pushing, et cetera, et cetera. Okay.

I also feel strongly that despite the overcrowdings of parking in the Aliamanu district it is doubtful there will be enough people that abandon their driving to utilize the rail. I'm sure that it can be argued. The rail may be still an option for those who are currently obtaining bus service presently. I can see that segment of the population which would favor the rail here in Salt Lake.

I also feel strongly that I -- excuse me -- that many people who probably -- and don't feel insulted when I say a thing like this -- many people who probably have not lived for an extensive period of time on the mainland or in foreign countries don't know the experience of being too close to steel wheel on steel rail. It can get pretty noisy, although studies have been shown to show that it shouldn't be a problem, but I still have my doubts about decibel levels and the impact on people and what connection it might have with sleep deprivation.

And I feel last but not least because of the noise level and condemnation of residential and business property --

(Buzzer sounds.)

HEARING OFFICER HAMAYASU: Please summarize.

MR. WEBB: Okay. In conclusion, I feel that the Salt Lake linkage would create more disruption to the quality of life and incur more social cost than what the community is willing to bear. Thank you.

Reply Requested :

RECORD # 335 DETAILS

Status : Initial Action Needed
Creation Date : 1/6/2009
Creator Affiliation :
First Name : Douglas
Last Name : Torres
Business/Organization :
Address : 99-199 Kalaloa Street
Alternative Preference :
Apt./Suite No. :
City : Aiea
State : HI
Zip Code : 96701
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Salt lake
Other Submission Method : Main
Submission Date : 12/09/2009

Submission Content/Notes : MR. TORRES: My name is Doug Torres, and I'm a resident of Salt Lake Boulevard. We, the residents and community of Salt Lake Boulevard are against the rail down Salt Lake Boulevard. As indicated, there will be only two stations along the Salt Lake Boulevard, one at the stadium and one at Ala Lilikoi Street.

Almost the entire length of the boulevard it's only for rail to pass through; no stops. How can the people who voted for it justify all the homes and lives that will be affected by this rail, passing above 400 times a day? How is it going to affect the students of Makalapa Elementary, Radford High School, Aliamanu Elementary seeing, hearing, feeling 20 times per hour during peak hours? How do you think it will affect the quality of life of those who live on Salt Lake Boulevard?

The Council has voted 7 to 1 in favor of changing the rail from Salt Lake back to the original route to the airport. You have voted for the rail down the boulevard. Now, feel how it feels to be deceived, disappointed and frustrated that things can get. When the rail route has changed from the airport to Salt Lake Boulevard by Councilmember Cachola, we, the residents of the boulevard, could not believe this was happening. Our frustration and disappointment has been with us for a long time. He has sold our quality of life for a vote and for his vision. A good community leader takes care of his community but will not sacrifice other communities for the betterment of his. A good representative will make sure of this, but in both cases this is not to be. His vision is the same vision that Salt Lake Boulevard starts and ends at Ala Lilikoi Street. You call this tunnel vision. It starts at Aloha Stadium, passes Halawa Estates Shopping Center, Stadium Mall, Foster Village, Makalapa Elementary, Radford High School and the park, Aliamanu and the Naval Housing and Aliamanu Elementary. All these communities and residents are not seen in his vision or they were and are to be sacrificed.

We have a second chance and we must take advantages of this. With our eyes wide open we must first remember we live in the best location on this island which is called central. Every location is in driving distance. Yes, we will not give up our cards. And we also have so many different ways to get to our destination and to our hoe. We will be the last place on this island to give up our cards, because we live in the best location, which is central.

This does not mean that we give up rail. Our hope is Councilmember Cachola and our community leaders must have an open mind and take a good look at the airport route. The advantage is ours because of the location we live and the location for the rail station.

(Buzzer sounds.)

Living in a central location would give us the best of three ways to travel, the rail, our buses and most of all our cars. I hope that you not only heard what I have to say but that you listened to the words I have to say, because the families, friends along the boulevard --

HEARING OFFICER HAMAYASU: Please summarize.

MR. TORRES: -- will not lose the second chance we have to move the rail back to the airport.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Draft EIS Comment
No

RECORD # 336 DETAILS

Status : Initial Action Needed
Creation Date : 1/6/2009
Creator Affiliation :
First Name : T.K.
Last Name : Chun
Business/Organization :
Address : 2646-B Haili Road
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96813
Email : tkcassocia@aol.com
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Salt lake
Other Submission Method : Main
Submission Date : 12/09/2009
Submission Content/Notes : My name is T.K. Chun. I'm a retired engineer. I live in Pacific Heights area. I missed the hearing last night because of the Christmas party. I support the rail transit system and I vote for it. Good engineering should start with the critical area. We shouldn't start from way up in the Kapolei area. We should start from Waipahu to the downtown area. That's the critical area. And we should do it now. It's probably going to take us more than ten years. I'll tell you a little story. I was the -- I went to the first public hearing in 1963 for H3. It took us 30 years to build it. So I hope we can build this maybe in ten years or less, because in other countries they build it in four or five years, so I hope I can ride it before I die, before I kick the bucket. I'm 74 years old and I helped build H3, so it took us -- it took us 30 years to do H3. I hope we don't take another 30 years to get our mass transit system.

Thank you.

Reply Requested :
Submission Type : Right-of-way
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :
FOIA Response Date :

RECORD # 337 DETAILS

Status : Initial Action Needed
Creation Date : 1/6/2009
Creator Affiliation :
First Name : Thomas J.
Last Name : Strout
Business/Organization :
Address : 871-5 Ala Lilikoi Street
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96818
Email : tomstrout@msn.com
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Salt lake
Other Submission Method : Main
Submission Date : 12/09/2009

Submission Content/Notes : MR. STROUT: Hello, my name is Tom Strout. I'm a resident of the Salt Lake Area. I'm just curious as to why they think the airport would be more advantageous and more efficient to draw in money as opposed to the Salt Lake alignment. The reason being, the employment distribution in the airport, Hickam, Pearl Harbor area, according to your DEIS ranks sixth and the Salt Lake employment ranks seventh so there's not uch of a difference there, but the populatino difference between the airport versus Salt Lake, airport ranks 23rd; Salt Lake ranks sixth. And by the year 2030 airport is going to rank 24th and Salt Lake is going to rank 9th.

Now, of these rankings, the bigger population is this side of the stadium, you know. When you look at the drafts you have in your DEIS, it just did not make much sense when there's such little effect out that way. Now, come closer to 2030, yeah, you'll have a greater amount of people out that way, but how many of them travel all the way into town? Some of them only come halfway. The traffic problem is the downtown corridor. If we relieve the traffic there, it makes it simplified and easier for everybody coming from the other side of the island, you know. That's what I think we should try and look at how we really want to spend the money.

Besides the airport route is going to be more costly. It's going to take longer for that route to go from one destination to another. And it just doesn't -- you know, they're going to put a longer delay on getting this thing built and we need to get the thing started.

Thank you.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Draft EIS Comment
No

RECORD # 338 DETAILS

Status : Initial Action Needed
Creation Date : 1/6/2009
Creator Affiliation :
First Name : Tony
Last Name : Soon
Business/Organization :
Address : 1318 Wanaka Street
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96818
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Salt lake
Other Submission Method : Main
Submission Date : 12/09/2009

Submission Content/Notes : MR. SOON: Hi. My name is Tony Soon and I live in the Salt Lake Area. I voted for the rail, because it was going through Salt Lake. I feel it's fraudulent what the city council are trying to do at this time. Trying to rob us of something equivalent to a birthright that we should be having for all our children and grandchildren.

I have two sets of comments that I would like to make tonight and one is on the DEIS, and I didn't really read the DEIS in great detail, but here are a synopsis of some of the things which I found which was wrong.

First of all, the DEIS refers to the Salt Lake route as an alternate. When, in fact, it was the only route that was considered for the vote. I think that was wrong. The other thing is that the DEIS makes a skewed assumption that there has been no population growth in the year 2030 for the Salt Lake area, whereas they took the other areas into consideration.

The other thing that the DEIS contemplated was who was the rail supposed to serve, and according to them, according to their DEIS report, it says it is for the people with limited income and an aging population. That's the people of Salt Lake. I think by bypassing the people of Salt Lake, they would be robbing these older people and younger people, younger residents, of this opportunity of being able to enjoy the benefits of being on the rail.

Then the DEIS also makes reference to the transportation equity and what that means is it's a fair distribution of resources so that no other group, no group, carries an unfair burden or receives an unfair share of the benefits. When they route the rail down by the airport, what they're doing is that they're robbing the people of Salt Lake of this opportunity.

And here are my personal comments on this. I would say the people of Salt Lake are aging, and they have many children, a lot of younger residents and they're really low income and they need to be on the rail. The other thing again is there is this fallacy that is being passed around that the rail must go to the airport. Well, I lived in the City of Toronto, which is nearly 4 million people. The subway does not go to the airport. The subway stops five miles away from the airport and there's a bus that takes the tourists to the airport. The other thing that you need to remember is that you can imagine a tourist spending thousands of dollars going to Hawaii and leaving \$20 tips and \$100 tips and then all of a sudden cannot find \$30 so they can take a taxi. It's utterly ridiculous.

The other thing I'm worried about is that Salt Lake --

(Buzzer sounds.)

MR. STROUT: -- this report was made by three people, which includes the military, and I think somehow because the military is so nimble, I can't help but be very suspicious about this report.

Thank you.

Reply Requested :

Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :
FOIA Response Date :

RECORD # 340 DETAILS

Status : Initial Action Needed
Creation Date : 1/7/2009
Creator Affiliation :
First Name : Ben
Last Name : Ramelb
Business/Organization :
Address : 1148 Ala Liliko'i St
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96818
Email : ramelbb001@hawaii.rr.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 01/07/2009

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue: Land Acquisition
should be minimized by routing the fixed guideway over Nimitz Highway
instead of over Dillingham Boulevard.

Fact:
Numerous land acquisitions are required to build the fixed guideway
along Dillingham Blvd which will cause disruption to businesses, homes
and increase traffic congestion on Dillingham Blvd.

A fixed guideway route over Nimitz Highway instead of along Dillingham
Blvd will cause less disruption and result in lower cost for the project.

It is noted that the Oahu Regional Transportation Plan (ORTP) 2030
shows a two lane Nimitz Flyover over the median of Nimitz Highway
which could conflict with the proposed fixed guideway over Nimitz
Highway. If the Nimitz Flyover is built, it is suggested that both the
Nimitz "Flyover" and the fixed guideway be built within the elevated
Nimitz Highway right of way corridor. In this case, the two-lane "Nimitz
HOV Flyover (reversible)" can be built alongside and parallel to the fixed
guideway transit. The fixed guideway with a capacity of 6,000
commuters per hour and the two-lane "Nimitz Flyover", with a capacity of
4,000 vehicles per hour, should be adequate to substantially reduce the
bottleneck at the Middle Street Merge and on Dillingham Blvd between
Keehi Lagoon and downtown Hotel Street.

The Nimitz Flyover (reversible) should be connected to the Airport
Viaduct at Keehi Lagoon to Alakea Street/Halekauwila St via an
underpass and to Hotel Street Mall via an elevated busway. These
connections are described in a Managed Lane Study "Transportation
Alternatives Analysis for Mitigating Traffic congestion between Leeward
Oahu and Honolulu". The full report is available at
www.eng.hawaii.edu/~panos/UHCS.pdf.

The initial 2005 cost for the 10 mile Tampa Reversible was \$320 million
or \$32 Million per highway mile, however, a geotechnical design error
increased the cost to \$420 million or \$42 million per mile. Using a
geographic and escalation factor of 100 percent, the 3-mile Nimitz HOV
Reversible Flyover at \$60 to \$80 million per mile would cost between
\$180 million to \$240 million.

Recommendation:

It is recommended that the fixed guideway route be over Nimitz Highway
instead of Dillingham Blvd to minimize disruption of homes and

businesses and minimize traffic congestion along Dillingham Blvd.

Respectfully,

Ben Ramelb P.E.
1148 Ala Liliko'i St
Honolulu, HI
96818

Copy to:
Mr. Ted Matley
FTA Region IX
201 Mission St. Suite 1650
San Francisco, CA 94105
FAX 415-744-2726

Governor Linda Lingle
Hawaii State Capitol
415 S Beretania St. 5th Floor
Honolulu, HI 96813
FAX (808) 586-0006

Honolulu City Council Members
FAX (808) 867-5011

Reply Requested :
Submission Type :
**FOIA (Freedom of
Information Request)
Request :**
FOIA Referral Date :
FOIA Response Date :

Yes
Draft EIS Comment

RECORD # 342 DETAILS

Status : Initial Action Needed
Creation Date : 1/7/2009
Creator Affiliation :
First Name : Isakara
Last Name : Sataraka
Business/Organization : Good Samaritan Church
Address : 94-027 Waipahu Depot St
Alternative Preference :
Apt./Suite No. :
City : Waipahu
State : HI
Zip Code : 96797
Email : satarakafamily@yahoo.com
Telephone : 808-781-6760
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 01/07/2009
Submission Content/Notes : I believe our city definitely need the Rail Transit now and for the future.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 343 DETAILS

Status : Initial Action Needed
Creation Date : 1/7/2009
Creator Affiliation :
First Name : Elizabeth
Last Name : Sataraka
Business/Organization : Good Samaritan
Address : 99-545 Opukea St.
Alternative Preference :
Apt./Suite No. :
City : Aiea
State : HI
Zip Code : 96701
Email : liz@hawaiiifoodbank.org
Telephone : 808-561-5695
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 01/07/2009
Submission Content/Notes : This is a great idea that the Rail Transit is planned to be build. Honolulu needs it now
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 344 DETAILS

Status : Initial Action Needed
Creation Date : 1/7/2009
Creator Affiliation :
First Name : Daniel
Last Name : Poyer
Business/Organization :
Address : 99-545 Opukea St.
Alternative Preference :
Apt./Suite No. :
City : Aiea
State : HI
Zip Code : 96701
Email : gsc_hawaii@yahoo.com
Telephone : 808-356-8404
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 01/07/2009
Submission Content/Notes : Build the Rail Now and lessen the traffic
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 345 DETAILS

Status : Initial Action Needed
Creation Date : 1/7/2009
Creator Affiliation :
First Name : Tracie
Last Name : Sataraka
Business/Organization :
Address : 99-545 Opukea St.
Alternative Preference :
Apt./Suite No. :
City : Aiea
State : HI
Zip Code : 96701
Email : gsc_hawaii@yahoo.com
Telephone : 808-693-5926
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 01/07/2009
Submission Content/Notes : I totally agree with the mayor, we need to build the Rail Transit
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 346 DETAILS

Status : Initial Action Needed
Creation Date : 1/7/2009
Creator Affiliation :
First Name : Kaiserlyn
Last Name : Sataraka
Business/Organization :
Address : 99-545 Opukea St.
Alternative Preference :
Apt./Suite No. :
City : Aiea
State : HI
Zip Code : 96701
Email : gsc_hawaii@yahoo.com
Telephone : 808-953-8907
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 01/07/2009
Submission Content/Notes : I fully support the Mayor and the Rail Transit
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 347 DETAILS

Status : Initial Action Needed
Creation Date : 1/7/2009
Creator Affiliation :
First Name : Isakara Nathan
Last Name : Sataraka
Business/Organization :
Address : 99-545 Opukea St.
Alternative Preference :
Apt./Suite No. :
City : Aiea
State : HI
Zip Code : 96701
Email : n_sataraka@Yahoo.com
Telephone : 693-6463
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 01/07/2009
Submission Content/Notes : Please build the Rail now
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 348 DETAILS

Status : Initial Action Needed
Creation Date : 1/7/2009
Creator Affiliation :
First Name : Manase
Last Name : Faualo
Business/Organization : Good Samaritan Church
Address : P.O Box 31029
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96820
Email : faualomanase@yahoo.com
Telephone : 808-341-4404
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 01/07/2009
Submission Content/Notes : The Rail Transit is necessary to cut down traffic now and years to come
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 349 DETAILS

Status : Initial Action Needed
Creation Date : 1/7/2009
Creator Affiliation :
First Name : Asomaliu
Last Name : Faualo
Business/Organization : Good Samaritan Church
Address : P.O Box 31029
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96820
Email : faualomanase@yahoo.com
Telephone : 808-699-3294
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 01/07/2009
Submission Content/Notes : I fully support the building of the the Rail Transit.
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 350 DETAILS

Status : Initial Action Needed
Creation Date : 1/7/2009
Creator Affiliation :
First Name : Moeone
Last Name : Faletogo
Business/Organization : Good Samaritan Church
Address : P.O Box 31029
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96820
Email : gsc_hawaii@yahoo.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 01/07/2009
Submission Content/Notes : I support the Rail Transit
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 351 DETAILS

Status : Initial Action Needed
Creation Date : 1/7/2009
Creator Affiliation :
First Name : Samuel
Last Name : Sataraka
Business/Organization : Good Samaritan Church
Address : 99-545 Opukea St.
Alternative Preference :
Apt./Suite No. :
City : Aiea
State : HI
Zip Code : 96701
Email : tanusataraka@yahoo.com
Telephone : 808-699-1205
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 01/07/2009
Submission Content/Notes : Go Mayor and do the right thing
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 352 DETAILS

Status : Initial Action Needed
Creation Date : 1/7/2009
Creator Affiliation :
First Name : Andrew
Last Name : Sataraka
Business/Organization : Good Samaritan Church
Address : 99-545 Opukea St.
Alternative Preference :
Apt./Suite No. :
City : Aiea
State : HI
Zip Code : 96701
Email :
Telephone : 356-8405
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 01/07/2009
Submission Content/Notes : The plan for a Rail Transit is the best thing will ever happen to Oahu
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 353 DETAILS

Status : Initial Action Needed
Creation Date : 1/7/2009
Creator Affiliation :
First Name : Leauma
Last Name : Laulu, Jr
Business/Organization : Good Samaritan Church
Address : P.O Box 31029
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96820
Email : gsc_hawaii@yahoo.com
Telephone : 808-699-1402
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 01/07/2009
Submission Content/Notes : Me and my wife support the Rail transit 100%
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 354 DETAILS

Status : Initial Action Needed
Creation Date : 1/7/2009
Creator Affiliation :
First Name : Imoa
Last Name : Faletogo
Business/Organization : Good Samaritan Church
Address : P.O Box 31029
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96820
Email : gsc_hawaii@yahoo.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 01/07/2009
Submission Content/Notes : Yes, it would be the best thing for us.
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 355 DETAILS

Status : Initial Action Needed
Creation Date : 1/7/2009
Creator Affiliation :
First Name : Tulima
Last Name : Naea
Business/Organization : Good Samaritan Church
Address : P.O Box 31029
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96820
Email : gsc_hawaii@yahoo.com
Telephone :
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 01/07/2009
Submission Content/Notes : I support the Rail Transit
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 356 DETAILS

Status : Initial Action Needed
Creation Date : 1/7/2009
Creator Affiliation :
First Name : Aulama
Last Name : Melei
Business/Organization : Good Samaritan Church
Address : P.O Box 31029
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96820
Email :
Telephone : 688-3245
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 01/07/2009
Submission Content/Notes : We support the Rail transit
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 357 DETAILS

Status : Initial Action Needed
Creation Date : 1/7/2009
Creator Affiliation :
First Name : Malo
Last Name : Sua
Business/Organization : Good Samaritan Church
Address : P.O Box 31029
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96820
Email :
Telephone :
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 01/07/2009
Submission Content/Notes : Thank you for thinking ahead to give the people a choice. Traffic is very bad from the Waianae Coast to Town.
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 358 DETAILS

Status : Initial Action Needed
Creation Date : 1/7/2009
Creator Affiliation :
First Name : Florita
Last Name : Pa
Business/Organization : Good Samaritan Church
Address : P.O Box 31029
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96820
Email :
Telephone :
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 01/07/2009
Submission Content/Notes : I will ride the rail transit
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 359 DETAILS

Status : Initial Action Needed
Creation Date : 1/7/2009
Creator Affiliation :
First Name : Taulagi
Last Name : Leano
Business/Organization : Good Samaritan Church
Address : P.O Box 31029
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96820
Email :
Telephone :
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 01/07/2009
Submission Content/Notes : This is a great help for us to have the rail transit
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 361 DETAILS

Status : Initial Action Needed
Creation Date : 1/7/2009
Creator Affiliation :
First Name : Fidelia
Last Name : Leano
Business/Organization : Good Samaritan Church
Address : P.O Box 31029
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96820
Email :
Telephone :
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 01/07/2009
Submission Content/Notes : I support the rail transit
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 362 DETAILS

Status : Initial Action Needed
Creation Date : 1/7/2009
Creator Affiliation :
First Name : Faanati
Last Name : Leano
Business/Organization : Good Samaritan Church
Address : P.O Box 31029
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96820
Email :
Telephone :
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 01/07/2009
Submission Content/Notes : I support the rail transit
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 363 DETAILS

Status : Initial Action Needed
Creation Date : 1/7/2009
Creator Affiliation :
First Name : Pepe
Last Name : Maulupe
Business/Organization : Good Samaritan Church
Address : P.O Box 31029
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96820
Email :
Telephone :
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 01/07/2009
Submission Content/Notes : stop the commotion & begin the project
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 364 DETAILS

Status : Initial Action Needed
Creation Date : 1/7/2009
Creator Affiliation :
First Name : Samoa
Last Name : Naea
Business/Organization : Good Samaritan Church
Address : P.O Box 31029
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96820
Email :
Telephone :
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 01/07/2009
Submission Content/Notes : I want the rail transit to start rolling
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 365 DETAILS

Status : Initial Action Needed
Creation Date : 1/7/2009
Creator Affiliation :
First Name : Veronica
Last Name : Tuia
Business/Organization : Good Samaritan Church
Address : P.O Box 31029
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96820
Email :
Telephone :
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 01/07/2009
Submission Content/Notes : Can we start now? Thanks
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 366 DETAILS

Status : Initial Action Needed
Creation Date : 1/7/2009
Creator Affiliation :
First Name : Epaf eroti
Last Name : Sataraka
Business/Organization : Good Samaritan Church
Address : P.O Box 31029
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96820
Email :
Telephone :
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 01/07/2009
Submission Content/Notes : Rail Transit is the way to go. Our people need to save time and money from sitting in traffic and buying gas sitting in traffic
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 367 DETAILS

Status : Initial Action Needed
Creation Date : 1/7/2009
Creator Affiliation :
First Name : Taeotafe
Last Name : Melei
Business/Organization : Good Samaritan Church
Address : P.O Box 31029
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96820
Email :
Telephone :
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 01/07/2009
Submission Content/Notes : Lets build the rail transit for the sake of the people who are in need of transportation
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 368 DETAILS

Status : Initial Action Needed
Creation Date : 1/8/2009
Creator Affiliation :
First Name : Helito
Last Name : Caraang
Business/Organization :
Address : 98-144 Hekaha Street
Alternative Preference :
Apt./Suite No. :
City : Aiea
State : HI
Zip Code : 96701
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 01/08/2009
Submission Content/Notes : The approved route shouldn't be changed as it was what the people voted for. And it is most logical to go through centers of populations, i.e. Salt Lake, as the rail's primary objective is to get the residents to and from their jobs with the least time possible. The airport can be connected later; connections to UH and Waikiki should get the priority over the airport.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 369 DETAILS

Status : Initial Action Needed
Creation Date : 1/8/2009
Creator Affiliation :
First Name : Jeff
Last Name : Lovejoy
Business/Organization :
Address : 3674 Sims Lane
Alternative Preference :
Apt./Suite No. :
City : Wahiawa
State : HI
Zip Code : 96786
Email : jeffrey.lovejoy@us.army.mil
Telephone :
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 01/08/2009
Submission Content/Notes : To make public rail transit (which I am all for) to work, this project must be either "all in" or it will fizzle and die. You must make the lines accessible to everyone across the island, not just in one small corridor along the south. You must go to all sides, and though the middle of Oahu in order to get maximum ridership an public acceptance. You also need to study the successes and failures of communities and countries where rail has either worked or fell short and disappeared. Most of all you need to change the mindset of people and special interest groups who oppose change and progress in this state all in the name of tradition and keeping Hawaii country and blockading "mainland" ideas. You need to forge ahead with these plans (and further expansion) and stop getting caught-up in all this "environmental study" foolishness which has thwarted progress. Sometimes you need to force bad-tasting medicine down someone's throat; even though they hate it, it makes them better in the end. BUILD THE RAIL!
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 371 DETAILS

Status : Initial Action Needed
Creation Date : 1/10/2009
Creator Affiliation :
First Name : RICHARD
Last Name : BROWN
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : WA
Zip Code : 98682
Email : RUSTYBLADES63@YAHOO.COM
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 01/10/2009
Submission Content/Notes : When will you be forming you operating, safety, and maintannance managment teams, and how do I apply for a managment job with the new rail system.

Thank you
Richard Brown
Lead Machinist motive power.
Union Pacific Railroad Co.

Reply Requested : Yes
Submission Type : Information Request
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 372 DETAILS

Status : Initial Action Needed
Creation Date : 1/11/2009
Creator Affiliation :
First Name : Jaimie
Last Name : Obatake
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96816
Email : jobatake2014@earthlink.net
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 01/11/2009
Submission Content/Notes : How long will it take to build the transit system? Thanks!
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 373 DETAILS

Status : Initial Action Needed
Creation Date : 1/12/2009
Creator Affiliation :
First Name :
Last Name :
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96816
Email : jobatake2014@earthlink.net
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 01/12/2009
Submission Content/Notes : How much of a different in excise tax?
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 374 DETAILS

Status : Initial Action Needed
Creation Date : 1/12/2009
Creator Affiliation :
First Name : Doug
Last Name : Pyle
Business/Organization : Chair, Labor Caucus of the Democratic Party of HI
Address : 55 South Kukui Street
Alternative Preference : Both
Apt./Suite No. : Apt. 606
City : Honolulu
State : HI
Zip Code : 96813
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Salt lake
Other Submission Method : Main
Submission Date : 12/09/2008

Submission Content/Notes : MR. PYLE: Hello. I don't know if there's a particular format for introducing ourselves. Doug Pyle. I live in downtown. I have family here in Salt Lake and I also have -- as chair of the democratic party's labor caucus. The democratic party of Hawaii's labor caucus which supports rail, the democratic party supports rail in general, as passed by a resolution at the convention last spring.

The labor caucus has had a lot of talk about it in terms of jobs and its value along those lines and so I strongly support getting rail underway, both for the jobs it would recreate in construction as well as the economic stimulus it would provide, and given the economy in Hawaii and nationwide that's even more important to get this going soon.

Ideally both routes would be -- are great and should be built. The question is which first, and it does -- there's -- I wouldn't say that our caucus has a consensus, but there is agreement that there should be as early as possible start. The community did vote on the package, so there's an advantage to starting with Salt Lake, and some suggestions -- I don't know how much flexibility there is still in design, but perhaps if the Salt Lake route were built first, there could be a less expensive, say, light rail or tram off to the airport, such as other cities have. I've taken the one in San Francisco, as an example.

And another consideration is that along the route are several important destinations. We also need boarding points in dense population areas, where workers, shoppers can board to get to the destination. Salt Lake has a very dense population and so it deserves its own station. And one consideration is connecting through Camp Catlin Road. That would be - - that's right next to government housing, so it may be -- there may be property that could be used for developing, for example, a spur off to the airport and Pearl Harbor.

I don't want to take up any more time than is allotted and I just wanted to be brief and say that the Democratic Party in general and certainly the labor caucus that I chair supports the construction of rail.

Thank you.

Reply Requested :	
Submission Type :	Draft EIS Comment
FOIA (Freedom of Information Request) Request :	No
FOIA Referral Date :	
FOIA Response Date :	
Attachments :	DTS Comment Response Ltr.pdf (22 kb)

RECORD # 375 DETAILS

Status : Initial Action Needed
Creation Date : 1/12/2009
Creator Affiliation :
First Name : Maurice
Last Name : Morita
Business/Organization :
Address : 1142 Ala Aloalo Street
Alternative Preference : Salt Lake
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96818
Email : mmorita@hsta.org
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Salt lake
Other Submission Method : Main
Submission Date : 12/09/2008

Submission Content/Notes : MR. MORITA: Hi. My name is Maurice Morita and I live in South Salt Lake, and I hold different hats. I also am the vice chair for the neighborhood board 18 for Salt Lake, Aliamanu and Foster Village and I also work for the Hawaii State Teachers Association who supports the rail, too. Not the route, but the rail.

I do feel for the people that live on Salt Lake. We have some staff and some friends that do live on Salt Lake, and they always tell me because they know that I support the rail that I'm sorry, but I oppose the rail, and the reason why they oppose the rail is because they don't want it through their backyard. And that's the problem that we have is prisons, rubbish dumps; nobody wants it in their backyard so the City Council sometimes doesn't know where to build or put those things. And it's hard. So we send the prisoners to Texas. Unfortunately, we can't send people away.

But I think the rail is for the future and I -- and, like I said, I do understand the people that live on Salt Lake Boulevard, you know, for years and the way they feel, but to me I think we need the rail to come through Salt Lake for various reasons that these folks have said.

As far as the schools go, they do take a sound test to see if there's too much noise, and if there is too much noise, then the Department of Education usually will put air conditioners in the classroom. So that would be a plus for the schools to have air in the classroom, like all the other state offices and county offices are all air conditioned. Even the prison have air conditioners, but the schools don't have -- you know, some do, but not all. That would be a plus for the schools there that is on the site.

And then the other reasons that were given about why the rail should come through Salt Lake is we do have an aging group here and there's a lot of people that work in downtown, so I think that it would be advantageous for us. In talking to you, Toru, it could cost less to do a spur from Salt Lake to the airport than versus from the airport to South Salt Lake. So I think we would save a lot of money if we go to Salt Lake first and then do a spur to the airport when it decides to go to Waikiki, because they're not going to Waikiki on the first round.

Thank you.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Draft EIS Comment
No

RECORD # 376 DETAILS

Status : Initial Action Needed
Creation Date : 1/12/2009
Creator Affiliation :
First Name : Janice
Last Name : Soon Fah
Business/Organization :
Address : 1318 Wanaka Street
Alternative Preference : Salt Lake, Both
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96818
Email : fah@hawaii.edu
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Salt lake
Other Submission Method : Main
Submission Date : 12/09/2008

Submission Content/Notes : MS. FAH: My name is Janice Soon Fah and I'm a resident of Salt Lake. I'm also a teacher at the Department of Education. I went out to exercise my vote in the full knowledge that my vote would be honored, and I think the Salt Lake vote carried the rail. And I think we betrayed the trust of voters and we will lead to more apathy in voter turnout if we do not honor this vote that the Salt Lake residents made.

As far as concerns by the residents, I think as the residents who are concerned that this is going to create unsightly trains in their backyards, if they were to look at the route, the route follows Salt Lake Boulevard, and if they're familiar with the rail systems -- I lived in Toronto for 26 years before moving here to Hawaii, and I've lived here for 12 years, and actually the light rapid transit in Toronto drives along some of the most pretigious neighborhoods and it is so quiet, it is so clean, it is so efficient that people who formerly would drive their cars bumper to bumper into downtown Toronto will hop on that train and be in downtown in 30 minutes. They can read their newspapers, they can relax and they can actually enjoy the commute.

As a Salt Lake resident, I work in Kapolei, so I have a lot riding on this rail development, because I can see where a lot of young teachers who live in central district now will be able to offer their services in Leeward district where we have a demand for highly qualified teachers to teach in our struggling schools in the Leeward district.

Okay. I also understood from the information that was provided that no homeowner property will have to be acquired, at least not their entire home, which is what some people may fear; that it will infringe on their property and their property will be acquired, but because it's going to be an aboveground rail, what will happen is most of the run -- most of the operations will be above ground and they will just need land space to locate the elevators that will take the commuters to the ground level. So I think if we familiarize ourselves with the rail and what it's going to offer our community, we, the Sale Lake residents, will fight those politicians who at first opposed the rail and now that the vote has been carried for the rail are striving to influence that decision to move it to the airport. I say we go for Salt Lake and the airport or we go with the voters who voted for Salt Lake.

Thank you.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Draft EIS Comment
No

RECORD # 377 DETAILS

Status : Initial Action Needed
Creation Date : 1/12/2009
Creator Affiliation :
First Name : Len
Last Name : Pepper
Business/Organization :
Address : 1352 Olino Street
Alternative Preference : Salt Lake
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96818
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Salt lake
Other Submission Method : Main
Submission Date : 12/09/2008

Submission Content/Notes : MR. PEPPER: My name is Len Pepper. I live at 1352 Olino Street which is in Foster Village. I am in favor of the Salt Lake route. I think that the EIS is a good document and now I'm going to proceed to crab about it.

There are some things missing, which I think have import as far as deciding which alignment to use. In 1 -- I think it's in 1-6, there is a list of activity centers. That list does not include the Moanalua Shopping Center. It does not include the Stadium Marketplace. It did not include the Bouganville industrial area where we have got, for example, both wholesale and retail outlets and we have got a Target coming, I think, in March. It does not include the commissary area. It does not include the military public works center.

It's a fairly static document. It does not -- it gives a lot of statistical information about what it's going to be like in 2030, but it doesn't look at what the community is really going to look like and what the people are going to be like in 2030. In my judgment it is an aging community, Foster Village, for example, was begun in 1957 and so by 2030 it's going to be about 80 years old. The Salt Lake area will -- is also -- is about 30 years old at this point. The infrastructure will be aging, the population will be aging. It is likely to be poorer than it is now. Therefore, there is need for considerable assistance fro public transportation.

There are five schools, along the route. Makalapa School, Radford High School, Aliamanu Elementary, Aliamanu Intermediate and Moanalua High School. Again, in my vision of 2030, there will be magnet schools and other attractions which will bring people to those schools from other areas. Those kids will need public transportation. In addition, the document seems to talk mostly abut a five-day-a-week bring people to work and bring them back from work, but there's a lot of social benefit to be derived seven days a week from a public transportation system, and I hope that those things will be taken into account.

If there are other things, I'll give them to the public steno. Thank you.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :
Attachments :

Draft EIS Comment
No

DTS Comment Response Ltr.pdf (22 kb)

RECORD # 378 DETAILS

Status : Initial Action Needed
Creation Date : 1/12/2009
Creator Affiliation :
First Name : Mark
Last Name : Taylor
Business/Organization :
Address : 3427 Ala Hinalo Street
Alternative Preference : Salt Lake
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96818
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Salt lake
Other Submission Method : Main
Submission Date : 12/09/2008

Submission Content/Notes : MR. TAYLOR: Hello. My name is Mark Taylor and I'm a resident of 3427 Ala Hinalo Street in Salt Lake.

I'm just here to speak in favor of the Salt Lake alignment. I've already provided written testimony so I'm not going to repeat what's in that in this oral statement. I'm just going to highlight one item, which is in the Draft EIS which has to do with the cost of the airport alternative versus the Salt Lake alternative. The draft says in Section 6.4.2 that both the Salt Lake and airport alternatives would be financially feasible and yet that same paragraph says that the airport alternative would require \$1.4 billion in federal funding from the Federal Transit Administration. The document also says, though, that the FTA has not been approached to consider the 1.4 billion for the airport alternative. They've only agreed to consider 1.2 billion. I don't really quite understand how the EIS can state categorically that the airport alternative is financially feasible if the FTA has not been approached for funding that's required to construct it.

I think the reality is that this project is hovering on the very cliff of affordability, and if we go to the airport route and a couple of hundred million dollars in additional costs we're putting all the taxpayers in this room at risk of potentially having their property taxes raised to cover the shortfall, because if the FTA doesn't pay for it and the excise tax doesn't pay for it, all of you will be paying for it with higher property taxes.

I would also point out that Draft EIS does say that the Salt Lake route is the most cost effective route. It provides in the terms of the amount of dollars we're spending in benefit per dollar a higher efficiency return than the airport route does. So simply from the standpoint of fiscal prudence, the Salt Lake route should continue as the preferred route for the transit system.

Thank you.

Reply Requested :

Submission Type :

FOIA (Freedom of Information Request) Request :

FOIA Referral Date :

FOIA Response Date :

Attachments :

Draft EIS Comment

No

DTS Comment Response Ltr.pdf (22 kb)

RECORD # 379 DETAILS

Status : Initial Action Needed
Creation Date : 1/12/2009
Creator Affiliation :
First Name : Ben
Last Name : Remmell
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 00000
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Salt lake
Other Submission Method : Main
Submission Date : 12/09/2008

Submission Content/Notes : MR. REMMELL (phonetic): My name is Ben Remmell. I'm a professional engineer and master planner. And I'd like to comment on two things, which is the project phasing, which is Chapter 2 of the Draft Environmental Impact Statement, and it says that the first phase would be from Kapolei to Waipahu, and I totally disagree with that, because it would -- if we run out of money, the general excise tax is not providing the money that we need. We need to build it to eliminate the bottlenecks at Middle Street and Pearl City, so the first phases should be from Aloha Stadium to downtown and that's what I recommend for the DAS to consider in the project phasing.

The second point I want to make is that the single and most important reason for building mass transit is to eliminate traffic congestion. Rail simply does not do that, despite spending \$7 billion. The City's alternative analysis show that the current 2,000 vehicles per hour at Pearl City, which is now congested, will increase to 8,000 vehicles per hour after the \$7 billion rail is built. What we need is an alternative solution which the alternative analysis discarded fraudulently. And I suggest we need to build a Nimitz flyover and a Kam flyover, both of which would be three lanes over the Kam highway and Nimitz which will eliminate the bottlenecks at the Pearl City H1/H2/Middle Street merge for less than \$1 billion and that's what the DEIS ust and should include.

That's what I recommend.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :
FOIA Response Date :
Attachments : DTS Comment Response Ltr.pdf (22 kb)

RECORD # 380 DETAILS

Status : Initial Action Needed
Creation Date : 1/12/2009
Creator Affiliation :
First Name : Mike
Last Name : Uechi
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 00000
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Salt lake
Other Submission Method : Main
Submission Date : 12/09/2008

Submission Content/Notes : MR. UECHI: My name is Mike Uechi. I'm a physician. It's really interested to read the -- this pamphlet put out by the City at taxpayers' money, The Honolulu Rail Transit, and one of the questions they ask is how would property owners along the route be affected, and it states here that while some residential and commercial properties must be acquired in full, most of the right-of-way acquisitions required are for portions of individual parcels. Now, does that mean that if part of the rail post, the support, goes through part of a property like say through the living room, that you pay for that portion of the land and let the person live in the rest of the land? That's the part that I really don't understand. What does portions mean? Does it mean a little bit of thing that's not attached to the home or business, and that's the only portion you're going to pay for.

The other question I have is that while construction of rail goes on and let's say there's a delay and another delay and another delay while properties that are being sold or leased are abandoned by property owners, what's going to happen to the cost of construction? What's going to happen to the community that's involved when this rail gets stalled for any reason at all, whether there's problems with finding burial sites along the City properties or whether you run out of money or any type of thing that will stall the development while it's going on right now? And that's the type of questions I would like to ask you guys right now, because I think these are the questions the community needs to know before we actually start the rail.

That's all I have to say.

Reply Requested :	
Submission Type :	Draft EIS Comment
FOIA (Freedom of Information Request) Request :	No
FOIA Referral Date :	
FOIA Response Date :	
Attachments :	DTS Comment Response Ltr.pdf (22 kb)

RECORD # 381 DETAILS

Status : Initial Action Needed
Creation Date : 1/12/2009
Creator Affiliation :
First Name : Frank
Last Name : Genadio
Business/Organization :
Address : 92-1370 Kikaha Street
Alternative Preference :
Apt./Suite No. :
City : Kapolei
State : HI
Zip Code : 96707
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Salt lake
Other Submission Method : Main
Submission Date : 12/09/2008
Submission Content/Notes : MR. GENADIO: My name is Frank Genadio. You have my address. I'm from Kapolei. I thought that you could only testify once, but when Dr. Uechi came up, I realized I could testify again. I've been following the hearings. In Kapolei I tried to make the point that the Draft EIS brushed off other technologies. I happen to be a proponent of something called the HSST urban magnetic levitation system. Those of you who are concerned about the cost should be aware that the maglift guidway would be built at least 20 percent cheaper. The guidway construction would accomodate 25.3 miles for the 20 mile cost reflected in the Draft EIS. In other words, we could have an extension into Salt Lake from the airport route, we could also have an extension to UH Manoa whose students have been left out of this entirely, and we could even have a spur into Waikiki.

It also happens to be at least twice as quiet as steel wheels on steel rail and its guidway is much less obtrusive and will require much less impact on property. Thank you.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :

RECORD # 382 DETAILS

Status : Initial Action Needed
Creation Date : 1/12/2009
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Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Salt lake
Other Submission Method : Main
Submission Date : 12/09/2008

Submission Content/Notes : MS. ING: Yes. My name is Renee Ing. My address is P.O. Box 23094, Honolulu 96823. I'd like to talk about another technology that was not included in the EIS despite words to the effect that everything was studied, and I think it should be studied. Phileas magnetic guided - magnet guided, not magnet levitation. A similar system was funded in San Francisco and someplace in Oregon by the FTA in 2007 and that means it could be funded for here. It is 1.5 billion compared to 5 and 6 billion. It's 1.5 billion for the Kapolei to UH route. It can be built with just plain old -- our plain old GET money. You don't even need New Starts money. But on top of that it can be quiet running through Salt Lake. Not only can you go cut and cover, you cut a mini tunnel underneath the boulevard, cover it so that Salt Lake Boulevard continues to run, but you cut and cover a tunnel underneath.

On top of that if you had to, you could -- because it's a Prius-like vehicle, it's very, very quiet and it will be of hydrogen fuel cells in a few years and on top of that it does this thing called running silent. It can be -- the noise can be cut for a little bit while it's going through the residential areas. That's the noise problem.

The second problem that we have been hearing a lot about it that if the route that's constructed now, actually if it were for steel rail, I think it's a pretty good route, but the problem is there are other technologies. Phileas can go around a lot of these places that are going to be intersected by a steel train, Phileas will not cut through them, it will simply go around them, because it is very, very flexible. So I would really hope that the City administration will study the Phileas system and the urban magtlift that Mr. Genadio was talking about in the EIS. The FTA usually says it expects municipalities to study a broad range of odes of technology, not just one. So it's not something that Honolulu will be -- you know, it would be unusual for Honolulu to do this. Other municipalities studied a lot of different ways of technology before they choose, and to give them the chance to submit a request for proposal.

Thank you.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :
Attachments :

Draft EIS Comment
No

DTS Comment Response Ltr.pdf (22 kb)

RECORD # 383 DETAILS

Status : Initial Action Needed
Creation Date : 1/12/2009
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Submission Method : Transcript - Salt lake
Other Submission Method : Main
Submission Date : 12/09/2008

Submission Content/Notes : MR. TAKAI: My name is Mark Takai. I'm a state representative, representing the communities of Aiea and Pearl City. Tonight I speak as the chairman of the Kamehameha Highway improvements task force and for those of you who are unfamiliar with our task force, it's comprised of all the elected officials in the Aiea, Pearl City and Sale Lake areas. It also consists of the Aiea, Pearl City and Salt Lake, Foster Village neighborhood boards. In addition to that, it includes some of the significant stakeholders along the Kamehameha Highway corridor in Aiea/Pearl City.

The corridor for us begins on Center Drive on the east side and goes all the way for about 5.5 miles to the end of Kamehameha Highway on the Pearl City side, which is a little bit past Sam's Club.

We've been working at improvements along this corridor for about three years, and we try to meet quarterly. Two years ago when this issue came up, we took a position as a task force, and I just wanted to mention -- and we sent it in a few times and I've testified in front of the Council a number of times, but I wanted to put this in the record. A couple of things that the City as you move down this path should be considering.

The first one is about 20 years ago there was a compromise made by the City and Hawaiian Electric to underground the 48 kilovolt lines on the mauka side of the viaduct, but to construct the 138KV lines that are the huge super structures, the huge metal poles that run the entire length of the corridor, and I do believe it goes up Salt Lake Boulevard as well. Our task force recommends that the City consider incorporating the 138KV and all of the other utilities down that corridor into the mass transit super structure. It's a small price for our community to -- I mean, it's a big price for our community to have the train coming through our corridor and I think it's a small price for the users and for the City to incorporate those utility lines within the super structure.

The second one is we spent a lot of money and a lot of time planning for aesthetic improvements up and down the corridor. In fact, we hired -- the State hired Parsons Brinckerhoff and in that consulting contract we have set aside some funds to hire an architectural engineer --

(Buzzer sounds.)

-- who has spent a lot of time designing motifs and everything. So we would like to request as you move forward that you consider working with us, especially in our corridor, but also working with other communities as you design the way these super structures look and the way the medians look throughout our communities.

I'll be sending written comments in later. Thank you.

Reply Requested :

Submission Type :

Draft EIS Comment

RECORD # 384 DETAILS

Status : Initial Action Needed
Creation Date : 1/12/2009
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Submission Method : Transcript - Salt lake
Other Submission Method : Main
Submission Date : 12/09/2008
Submission Content/Notes : MR. LOO: My name is Herbert Loo. I'm a retired master sergeant, retired in 1966. When I was drafted in 1945, I took my first train ride from Iwilei up to Schofield. Too bad they don't still have that train line. I'm here to support the rail transit, because in my travels in New York City, seven years there, you see billions of people traveling on the subway, terrific transportation. Just think if they didn't have that type of transportation, just think if we had that transportation 20 years ago. We are so backwards here it's pitiful. Build it right away, as soon as possible. Thank you.
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :
FOIA Response Date :
Attachments : DTS Comment Response Ltr.pdf (22 kb)

RECORD # 385 DETAILS

Status : Initial Action Needed
Creation Date : 1/12/2009
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Submission Method : Transcript - Salt lake
Other Submission Method : Main
Submission Date : 12/09/2008

Submission Content/Notes : SCOTT: My name is Scott. I live here in the Salt Lake area. I'm born and raised here in Hawaii. I've seen a lot of stuff growing up here as a kid. I've seen how when I was a little kid I could go to Queen's with my dad, when he used to work there, in ten minutes. Nowadays if you're not on the road before 6:00 in the morning to get past Middle Street, you'll be lucky to take an hour and a half. That's five, seven miles, and it's not getting any better. It's only getting worse. There's no perfect solution with mass transit, but if we don't do something with this rail and get something going, regardless of what medium we use, whether it be steel on steel, magnetic or otherwise, ten years from now to try and figure out something, then it's going to be too late.

The other thing, too, we have got to look in the smart sense. You know, picking these routes and stuff is great, but we have got to link one end of the island to the other, because if there's a bad wreck or something like that, traffic and everything around here comes to a halt. Also, through the airport. We have got to get some efficiency into how we get around here. The smart thing would be is whatever route we pick, think of the long term as far as linking the new university in Kapolei out there to the universities and work down in town and also allowing for the business people and other people who travel light to go through the airport, because the ability to build a super structure there is easy. Look at the parking structures they've got going up. It's not an eyesore and it makes it more centralized, especially being all of this is part of the Department of Transportation.

So, we have got to do something now. Not talk about it, think about it, maybe build it in 20 years, like the H3. Obviously the H3 works. In other places around the world they use rail on rail, DART, BART. It all works. But we need to implement it now before it's almost too late.

Thank you.

Reply Requested :

Submission Type :

FOIA (Freedom of Information Request) Request :

FOIA Referral Date :

FOIA Response Date :

Attachments :

Draft EIS Comment

No

DTS Comment Response Ltr.pdf (22 kb)

RECORD # 386 DETAILS

Status : Initial Action Needed
Creation Date : 1/12/2009
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Submission Method : Transcript - Salt lake
Other Submission Method : Main
Submission Date : 12/09/2008

Submission Content/Notes : MR. PYLE: Thank you. Doug Pyle. I spoke earlier on behalf of an organization I chaired and I want an opportunity to add a few personal items of testimony. Two points, one would be the -- everybody who lives or has family like I do in Salt Lake knows how the congestion really jams up right at the convergence where H1 and Red Hill and the on-ramp here below Tripler all come together, and rail would be a great alternative for this community in particular to be able to have -- to get out of that mess and get to their destinations, and I think that's an advantage that the airport route does not have. Although in the long run I think the airport route would be real valuable to also have, perhaps as a spur.

And secondly, and I think it's very important, I haven't seen the City doing this yet -- I hope it will -- look at rail as being one part of an integrated transit plan, including pedestrian/bicycle and just -- I grew up in Portland, Oregon which won awards for planning comprehensively. It has rail, but it has a bus mall that is pedestrian/bus only, no cars. Fareless Square, which is extremely successful. People can park their cars, park and ride, and if they're downtown, they ride any of the modes of transportation for free, and then go home. The traffic flows wonderfully there because they planned in a comprehensive way, and I hope the City will do that, too.

One final point when I just noticed that no other hands were going up, I remembered hearing at one of the hearings was reportedly had low turnout, and even though perhaps there's only a few people that testified, I think the record should show that this room is over full and there's standing room and in the parking lot it was real hard for me to find a spot. There's a lot of interest here in Salt Lake certainly, I assume in support, but certainly a great deal of interest in this, so I didn't want that to go unnoted, the turnout.

Thank you.

Reply Requested :

Submission Type :

FOIA (Freedom of Information Request) Request :

FOIA Referral Date :

FOIA Response Date :

Attachments :

Draft EIS Comment

No

DTS Comment Response Ltr.pdf (22 kb)

RECORD # 387 DETAILS

Status : Initial Action Needed
Creation Date : 1/12/2009
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Other Submission Method : Main
Submission Date : 12/09/2008

Submission Content/Notes : MR. SOON: Tony Soon here again. It is said that the airport route is going to cost \$200 million more. The reality is I can assure you it's probably going to be more like half a billion. Where is that money going to come from? I do not know. You know right now the City is under duress in trying to meet the EPA standards for a secondary waste water treatment plant. That's going to be \$1.5 billion. That 200 -- supposedly \$200 million can go toward a down payment on getting this fixed.

We also have the existing (inaudible) carriers down there that all need to be repaired. That's another \$300 million that's going to take basically. And then they talk about a \$5 million annual operation cost in perpetuity, meaning for my lifetime and my grandkids lifetime and that \$5 million could go toward building a homeless shelter, maybe two homeless shelters every year, or it could go toward fixing schools or it could go toward fixing over 20,000 potholes a year. Every year we can just fix these potholes, 20,000 of them.

So I think by putting the routes south of the Nimitz down by the airport way, which is a blighted area of town, I think it's stupidity, and because most of the people who live south of Nimitz are military and most of them drive and, of course, they get gas for half price or, okay, two-thirds of what we pay for it and you do need your car with a sticker on it to be able to enter into the military compounds. So trust me, they're still going to be driving. Now what happens after 5:00 on this route? It's going to be totally deserted. And my opinion to the City is that maybe what we need is a wiki-wiki system that will serve that area and maybe at 6:00 we just cut it off. Why are we going to have a route running down to the airport with nobody sitting on it except people going back to Kapolei? Is it not for everybody in Honolulu? Why just only people in Kapolei.

Thank you.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Draft EIS Comment
No

RECORD # 389 DETAILS

Status : Initial Action Needed
Creation Date : 1/13/2009
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Submission Method : Website
Other Submission Method :
Submission Date : 01/13/2009

Submission Content/Notes : Comments on "Honolulu High-Capacity Corridor Project Draft Environmental Impact Statement
1/13/09

I wish to comment on noise considerations for the proposed new transit system for Honolulu having been a practicing acoustical engineer in Hawaii for over 20 years.

The most important thing is to have reasonable background noise levels in your home wherein you can use normal voice, TV and radio sound levels when a train goes by. You should not have to use strained, loud voices to talk to each other or to raise your TV remote volume every time a train passes by. During the quiet night time you should not be awoken by train passes.

The Department of Housing and Urban Development (reference 1) states: "Noise can cause or increase sleeplessness, irritability and anxiety. There have been numerous acts of violence, including murder, associated with noise. Noise negatively impacts health, safety, comfort and productivity".

Different Federal Agencies have different noise impact rules to protect you from excessive noise.

EPA recommends that ideally interior background noise levels of 45 decibels dBA Leq for residences (reference 2). In reference 1 HUD's regulations do not contain standards for interior noise levels. Rather a goal of 45 decibels is set forth and the attenuation requirements are geared toward achieving that goal. It is assumed that with standard construction any building will provide sufficient attenuation so that if the exterior level is 65 dBA Ldn or less, the interior level will be 45 dBA Ldn or less (the outdoor-to-indoor noise reduction implied is 20dBA).

Here in Hawaii many hundreds of housing units face traffic (and potentially transit) noise sources with open sliding glass doors on their lanais and open glass jalousie windows having outdoor-to-indoor noise reductions of 10dBA or less allowing noise inside the homes that is subjectively twice (or more) as noisy as a 20 dBA noise reduction.

The Federal Highway Administration (FHWA) suggests interior levels of 52 decibels as being acceptable by taking "Feasibility" and "Reasonableness" into account. (Table 3-4, reference 3). The Federal Transit Administration (FTA) does not explicitly recommend acceptable indoor noise levels, but assumes that typical housing has 'quality' windows that are closed providing an outdoor-to-indoor noise reduction of 25dBA and honors HUD's exterior level of 65 dBA Ldn (page 3-10, reference 3).

Improper transit noise studies could lead to many families suffering excessive noise inside their homes. There could be class action law suits after the mainland consultants and contractors are gone. The DEIS must address the additional noise impact caused by many homes

now using natural ventilation year around with open lanai doors and windows and not the assumption that the 'typical' home has closed fenestration. After litigation, many hundreds of homes could get the needed new windows and doors to close for reducing traffic and transit noise as well as the needed air-conditioning. Who pays for this and the extra electric bill costs? Who pays the attorneys fees? What are the carbon energy footprint implications of all these additional AC units?

From the DEIS report I have these comments as well as technical questions which are numbered and underlined.

A) According to the Honolulu Advertiser article on 3/11/08, "severe noise" may occur at 55 locations, all at Salt Lake, and "moderate noise" at 397 other locations ...". This article only mentioned Federal Highway Administration (FHWA) rules from a Parsons Brinckerhoff's report dated 5/07/08.

The DEIS, now shows zero (0) "severe" noise impacts and "moderate" impact at only 49 locations and seems to only mention Federal Transit Administration (FTA) rules. The Executive Summary states there are only 18 to 24 residential buildings subjected to "moderate impact".

It is now understood that the impact calculations in the 3/11/08 article did not include any noise reduction measures (reference 4).

A-1 Please explain what factors or considerations changed the overall noise analysis so favorably – noise reduction measures or noise impact criteria rules or what?

B) B-1 What source noise mitigation measures were assumed in the DEIS analysis?

B-2 Was slowing down the trains in any areas utilized to develop the final analyses to reduce noise impact in sensitive areas?

According to the Executive Summary in the DEIS, parapet walls and wheel skirts would only reduce noise levels by 2 to 5 dBA. The DEIS states that "sound-absorptive materials in the track area" and other mitigation measures will be evaluated during the preliminary engineering stage. Reference 3, Chapter 6 also states: "These mitigation measures work to maintain a rail system in its as-new condition. Without incorporating them into the system, noise levels could increase up to 10 dB."

B-3 When will these source mitigation measures be shown in the cost studies?

B-4 Shouldn't the DEIS state that specifications and maintenance of mitigation measures should include significant penalties for non-compliance? (reference 3, Chapter 6)

C) The low parapet walls allow a strong one-bounce noise path off the sides of the train to propagate to high-rise locations. See Figure 2.8 in reference 3.

C-1 Was sound absorption in the parapet walls considered to abate this phenomenon?

C-2 If not, why not?)

D) In Reference 3, Section 3.3, Pg. 3-14; it states "In some cases, both FHWA and FTA methods should be used, such as when both highway and transit cause significant noise, but at different times of day. An example would be a transit alignment that shares the right-of-way with an arterial road with heavy traffic. Traffic noise may dominate during the peak commuting hours but not during off-peak periods when transit continues to operate. In this case, both sets of criteria would be used to determine whether impact occurs from neither, one or each mode."

D)D-1 Have FHWA noise impact and mitigation methods been utilized in developing the DEIS, and, if not, why not?

E) Hawaii's famous weather allows natural ventilation in most homes with open windows all year around. This causes all types of traffic noise commonly to be at least twice as noisy inside many typical Hawaiian homes compared to typical homes on the mainland. FTA Standards assume that "typical buildings" have "about 25dBA outdoor-to-indoor noise reduction" with windows closed (Page 3-10, reference 3). I have measured outdoor-to-indoor noise reductions of only 7dBA with opened glass louvered windows and open lanai sliding glass doors having direct line-of-sight to the noise source. For example, such conditions will exist along Salt Lake Blvd. Perhaps 10dBA should be used for open Hawaiian housing.

E-1 Were outdoor-to-indoor noise reduction data of typical open fenestration obtained from measurements or the literature?

E-2 Was the quality of fenestration in buildings considered since it includes:

a) open to closed sliding doors on lanais; b) open жалousies to closed жалousies with window AC units and c) open sliding glass windows to fixed glass windows with central AC.?

E-3 For estimating noise mitigation costs what interior noise level was considered acceptable?

E-4 Was there a count of housing units requiring AC units for sound proofing and some consideration of operating costs for the home owner?

F) To account for such unique phenomena, Table 3-4, FHWA Abatement Criteria in reference 3 states that FHWA allows individual state agencies (with their consultants) to define the actual criteria that trigger mitigation studies (sound proofing) of potentially impacted residences. Table 3-4 implies outdoor-to-indoor noise reductions of 15 dBA can be assumed to allow outdoor noise levels of 67dBA Leq(h) to be the triggering criteria noise level for sound proofing of homes allowing 52dBA Leq(h) inside the homes.

Note for homes with normal, closed windows; the 67dBA triggering outdoor noise level allows about 7dB more (may be twice as noisy) than recommended by EPA (reference 2) for interior levels. For homes with open windows and doors, interior levels may be about 15dBA greater (maybe three times noisier) than EPA's recommendations. Our state agency (with their consultants) should address our unique low outdoor-to indoor noise reduction for our many naturally ventilated homes.

In mainland housing with heating and/or air conditioning, sound proofing may include replacing or upgrading windows and doors. As a starting point, reference 3, page 3-15, considers the cost range of \$25,000 to \$30,000 (2002 mainland dollars) per benefited residence to be reasonable. This estimate does not include some kind of air conditioning that would have to be considered in sound proofing naturally ventilated Hawaiian homes.

F-1 Were any estimates calculated for noise levels inside typical homes along the guideway and, if so, what levels were found?

G) Reference 3, Section 6.5 states: maximum noise level "is often desirable to include computations of L max in environmental documents, particularly for rail projects, because the noise from an individual train passby is quite distinguishable from the existing background noise" L maxshould be reported in environmental documents."

G-1 Were maximum noise levels calculated? If not, why not?

H) How noisy would the proposed transit system be to residents with open windows and doors if there was no motor vehicle traffic noise? Using outdoors-to-indoors noise reductions of 10 dBA, the transit "Noise Exposure" levels shown in Figures 4-39 to 4-42 indicate that 91% of all 42 residential locations measured would be in excess of HUD guidelines and 29% would be in excess of FHWA guidelines. Over the next decade or so, the makeup of motor vehicular traffic may be radically modified e.g. there may be all electric vehicles such that engine noise would be substantially reduced. Also it is possible that tire/road interfacing noise may be reduced by new breakthroughs in tire tread design and road pavement design as well as enforcing vehicle speed limits by high-tech devices.

H-1 Were these possibilities considered?

I) Reference 3, Chapter 3, Table 3.3 notes that the "Allowed Noise Exposure Increases" decrease as the cumulative noise level increases. "The justification for this is that people already exposed to high levels of noise should be expected to tolerate only a small increase in the amount of noise in their community."

The "Existing Ldn" traffic noise levels shown in Figures 4-39 to 4-42 indicate that about three-fourths (75%) of all 42 residential locations with closed windows are in excess of HUD and FHWA guidelines and that all (100%) of housing with open fenestration are in excess of HUD

guidelines and 79% are in excess of FHWA guidelines.

Thus most residents along the proposed guideway are already exposed to high levels of traffic noise, it is predictable that some residents may complain about the additional noise from the transit and take legal action, particularly since the new noise will be quite distinguishable from the existing background noise.

Note that in some cases the transit noise may dominate over regular traffic during peak rush hours when traffic slows down to stop-and-go levels (Levels of Service D through F) as well as after, say 10 pm, causing residents to positively identify transit noises and to be more conscious and irritable of them during times of high cumulative noise levels.

I-1 Because building noise reduction is so low in so many residential units and people may be already irritated by high traffic noise levels, does it not behoove the project to incorporate all stated noise mitigation measures shown in reference 3, Table 6-12 in order to improve the lifestyle of impacted residents as well to reduce the probability of class action law suits?

Reference 1 U.S. Department of Housing and Urban Development, HUDnoise.com

Reference 2 "EPA Levels Document", EPA 550/9-79-100, Nov. 1978

Reference 3 "Transit Noise and Vibration Impact Assessment", FTA-VA-90-1003-06, May 2006

Reference 4 the DEIS, "The Sound of Transit Operations" by Lawrence Spurgen

Mahalo,

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Reply Requested :
Submission Type :
**FOIA (Freedom of
Information Request)
Request :**
FOIA Referral Date :
FOIA Response Date :

Yes
Draft EIS Comment

RECORD # 390 DETAILS

Status : Initial Action Needed
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Submission Method : Website
Other Submission Method :
Submission Date : 01/13/2009
Submission Content/Notes : I understand taxes will increase. By what amount?
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 393 DETAILS

Status : Initial Action Needed
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Submission Date : 01/15/2009

Submission Content/Notes : MY CONCERNS:

1. OUR PROJECT IS AN ELEVATED, HEAVY RAIL SYSTEM - NOT LIGHT RAIL
2. TOTAL COSTS ESTIMATES OF THE RAIL ARE NOT LINE LINE WITH OTHER SYSTEMS RECENTLY EMPLOYED
3. FUNDS PROVIDED BY TOURIST GET PAYMENTS ARE ALREADY SIGNIFICANTLY LESS THAT ESTIMATED AND THIS TREND WILL CONTINUE
4. THE CITY IS FACING MONUMENTAL FINANCIAL COMMITMENTS FOR SEWER, ROADS, AND LANDFILL PROJECTS
5. THE RECENTLY ANNOUNCED CONTRAFLOW LANES AND MIDDLE STREET LANES ON THE FREEWAY SHOULD ALEVIATE ALOT OF CONGESTION. THE NEED FOR A RAIL SYSTEM SHOULD BE REVISITED ONCE THESE CHANGES HAVE BEEN IMPLEMENTED.
6. THE RAIL IS AN INFLEXIBLE SYSTEM THAT CANNOT AVAIL ITSELF OF NEW TECHNOLOGY.
7. CALTRANS AND UC BERKLEY ARE CONDUCTING AN AUTOMATED BUS GUIDANCE SYSTEM - A MAGNETIC GUIDANCE SYSTEM DEMONSTRATION PROJECT IN SAN LEANDRO [ALSO IN EUGENE, OREGON]. THE ESTIMATED COSTS FOR BUS RAPID TRANSIT ARE MATERIALLY LESS THAN LIGHT RAIL NOT TO MENTION HEAVY RAIL.
8. I DO NOT BELIEVE THE PROJECTED RIDERSHIP WILL TRANSLATE TO ACTUAL RIDERSHIP AND THAT THE ACTUAL RIDERSHIP WILL NOT RESULT IN SIGNIFICANT RELIEF.
9. TECHNOLOGY IS RAPIDLY CHANGING ALL ASPECTS OF OUR LIVES - TELECOMMUTING FOR WORK AND SCHOOLING, ELECTRIC & FUEL CELL CARS. WE NEED A SYSTEM THAT CAN BE ADAPTABLE TO OUR CHANGING NEEDS AND TECHNOLOGY.
10. AN ELEVATED RAIL SYSTEM IS TRULY CONTRARY TO A HAWAII SENSE OF PLACE. STATIONS EQUIPED WITH ESCALATORS, ELEVATORS, BATHROOMS AND SHELTERS ARE GRAFFITI MAGNETS.

PLEASE BE CAREFUL WITH OUR AND FUTURE GENERATION'S MONEY.

Reply Requested :

Yes

Submission Type :

Draft EIS Comment

HONOLULU FIRE DEPARTMENT
CITY AND COUNTY OF HONOLULU

636 South Street
Honolulu, Hawaii 96813-5007
Phone: 808-723-7139 Fax: 808-723-7111 Internet: www.honolulu.gov/hfd

MUFU HANNEMANN
MAYOR



KENNETH G. SILVA
FIRE CHIEF

ALVIN K. TOMITA
DEPUTY FIRE CHIEF

November 28, 2008

TO: WAYNE YOSHIOKA, DIRECTOR
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: KENNETH G. SILVA, FIRE CHIEF

SUBJECT: HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT
DRAFT ENVIRONMENTAL IMPACT STATEMENT

In response to your letter of November 12, 2008, regarding the above-mentioned subject, the Honolulu Fire Department (HFD) reviewed the material provided and requires that the following be complied with:

1. Provide a fire apparatus access road for every facility, building, or portion of a building hereafter constructed or moved into or within the jurisdiction when any portion of the facility or any portion of an exterior wall of the first story of the building is located more than 150 feet (45 720 mm) from a fire apparatus access road as measured by an approved route around the exterior of the building or facility. (1997 Uniform Fire Code, Section 902.2.1.)
2. Provide a water supply, approved by the county, capable of supplying the required fire flow for fire protection to all premises upon which facilities or buildings, or portions thereof, are hereafter constructed or moved into or within the county.

On-site fire hydrants and mains capable of supplying the required fire flow shall be provided when any portion of the facility or building is in excess of the 150 feet (45 720 mm) from a water supply on a fire apparatus access road, as measured by an approved route around the exterior of the facility or building. (1997 Uniform Fire Code, Section 903.2, as amended.)

3. Submit civil drawings to the HFD for review and approval.

DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION SERVICES

08 DEC 2 11:11

RECEIVED

Wayne Yoshioka, Director
Page 2
November 28, 2008

Should you have any questions, please call Battalion Chief Socrates Bratakos of our Fire Prevention Bureau at 723-7151.



KENNETH G. SILVA
Fire Chief

KGS/SY:jl

cc: Ted Matley, FTA Region IX

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

KAPOLEI HALE • 1000 ULUOHIA STREET, SUITE 309 • KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3003 • FAX: (808) 768-7053 • INTERNET: www.honolulu.gov

MUFI HANNEMANN
MAYOR



LESTER K.C. CHANG
DIRECTOR

GAIL Y. HARAGUCHI
DEPUTY DIRECTOR

December 8, 2008

TO: WAYNE Y. YOSHIOKA, DIRECTOR
DEPARTMENT OF TRANSPORTATION SERVICES

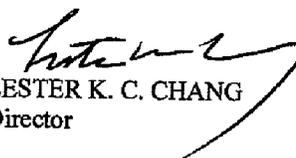
FROM: LESTER K. C. CHANG, DIRECTOR

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT
HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT

Thank you for the opportunity to review and comment on the Draft Environmental Assessment for the Honolulu High-Capacity Transit Corridor Project.

The Department of Parks and Recreation has no comment.

Should you have any questions, please contact Mr. John Reid, Planner, at 768-3017.


LESTER K. C. CHANG
Director

LKCC:jr
(289178)

cc: Office of Environmental Control
Ted Matley, FTA Region IX

RECEIVED
08 DEC 10 10:47
SUPERVISOR'S OFFICE
TRANSPORTATION SERVICES

RECEIVED
08 DEC 10 10:47

RECEIVED

AR00057349

December 8, 2008

Mr. Wayne Yoshioka
Director of Transportation Services
City and County of Honolulu
650 S. King St., 3rd Floor
Honolulu, HI 96813

Dear Mr. Yoshioka:

I have several questions regarding issues I feel are not adequately addressed in the Draft Environmental Impact Statement which was issued far too late for the voting public to review and, therefore, has become suspect of political overtones.

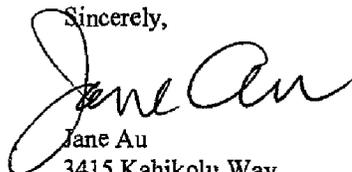
I am relieved that the Airport route is now being considered rather than the Salt Lake Route. I have been deeply concerned and depressed at the thought of this mammoth project running the length of our beautiful neighborhoods of Foster Village, Aliamanu and Salt Lake. I continue to be concerned about the aesthetics of this structure and its impact on the beauty of the Ewa flatlands and the overwhelming "bigness" of all that concrete running through the city areas. The stations also appear to be massive structures. I do not feel the DEIS has sufficiently addressed the issue of the visual effect of the transit system.

How will overhead structures, the noise and vibration levels and the interference during construction affect the many businesses and schools along the alignment? Will the businesses and schools be able to continue operation?

At the end of this project, the City will be forced to pay outrageous prices for property because land owners will have the upper hand. How seriously has the possibility of setting up a temporary rail yard near the airport or Aloha Stadium been considered?

I would also like to know what the future of Aloun Farms will be if they are forced to relocate.

Sincerely,



Jane Au
3415 Kahikolu Way
Honolulu, HI 96818

cc: Mr. Ted Matley, FTA Region IX
Governor Linda Lingle

DIRECTOR OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

08 DEC 10 P 3: 11

RECEIVED

Department of Transportation 12/8/08
650 South KING Street, 3rd Floor]
Honolulu, HI 96813

Dear Mayor of Honolulu: 12/6/08

It is time that the State took a position on
the economic feasibility of rail rapid transit.

The bill for elevated transit became law
without the signature of the Governor.

The public vote on rail was close, and
forecast future dissension. Subsequently,
the visitor count has gone down, while the
estimated cost of rail transit has gone up.

The State has the responsibility to consider
the impact of these developments on the
future of rail transit, and to report to the

public,

The Governor must take a position on the economic feasibility of rail transit before he can sign the draft Environmental Impact Statement into law. Please tell him so, orally or in writing, and that the former State Director of Transportation for Governors Burns and Ariyoshi said so.

I have been a Democrat for 99.8 years

Sincerely, *E. Alvey Wright*
E, Alvey Wright

Garry P. Smith
91-321 Pupu Place
Ewa Beach, HI 96706

Dec. 7, 2008

City Dept. of Transportation
Attn: DEIS Comments

→ Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King Street Third Floor
Honolulu, HI 96813

Dear Sir,

Please accept this as a comment concerning the DEIS on the proposed Rail Transit System being considered by the City and County of Honolulu.

1. The DEIS shows that the proposed system bypasses the most heavily congested area on the Leeward Coast-Ewa Beach. The purported purpose of the entire rail system is to provide an alternative for commuters coming from congested areas. The beginning of the rail system is more than 3.7 miles from Ewa Beach requiring us to drive or bus over heavily congested Ft. Weaver Rd. or the yet to be built North/South road. During peak traffic hours it can take 45 minutes to drive from Ewa Beach to H1 Freeway, even with the widening of Ft. Weaver Rd. and building of North/South Rd. it will take 30 minutes from Ewa Beach (end of Ft. Weaver Rd.) to the train station. Development in Ewa Beach will be far greater than in Kapolei or Waipahu yet these communities have their own station. Why does the DEIS not make provisions for including a station in the heart of the traffic congestion making us wait 15-20 years for a Phase II that might not ever be built?
2. The DEIS discloses that a train station is being built in a vacant field that has been bought by developer D R Horton to develop an 11,000 home community called Hoopili. The station is expected to provide significant enhancements to this developers project at great cost to the city and federal governments. Why is the city giving preference to a developer in assigning a station to this location while ignoring developments all ready built or in immediate need of transportation services?

Thank you for your response to my comments.


Garry P. Smith

DIRECTOR'S OFFICE
CITY AND COUNTY OF HONOLULU
DEPARTMENT OF TRANSPORTATION SERVICES

DEC 9 PM 12:34

RECEIVED

Jack R. Corteway
1525 Wilder Avenue, Apt. #504
Honolulu, Hawaii 96822

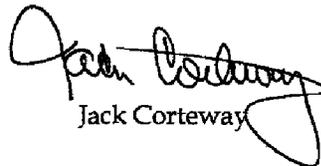
December 5, 2008

Department of Transportation Services
650 South King Street
3rd Floor
Honolulu, Hawaii 96813

Dear Department of Transportation:

In my judgment, it makes more sense if the first leg starts downtown and goes to Salt Lake and then Pearl City to secure significant ridership. If you begin at Kapolei and just go to Pearl City, I can't imagine many people riding.

Aloha,


Jack Corteway

DIRECTOR'S OFFICE
LEON J. LEUNG, JR.
TRANSPORTATION SERVICES

08DEC 9 PM 2:34

RECEIVED

7 December 2008

City and County Director of Transportation
Services

Attn: Wayne Yoshioka

Subject: DEIS for Rail Transit System

I want to make a comment and receive a
response concerning the DEIS on the Mayor's
Rail Transit DEIS.

- a. In Hawaii whenever construction is
done, Hawaiian bones or iwi are found.
This creates tremendous delays in
construction and increased costs. The
DEIS does not adequately address this
issue as it will become the major
issue of the construction. I want to
know what the contractors will do and
what provisions have been made to pay
for the increases in costs and
community concerns when construction
unearths Hawaiian bones.


Earl Arakaki

91-030 Amio, St. , Ewa Beach, Hi 96706

RECEIVED
TRANSPORTATION SERVICES
DEC 9 2008

RECEIVED
DEC 9 12:34

December 5, 2008

To: Mr. Wayne Yoshioka, City director of transportation

From: Pam Smith, 91-321 Pupū Place, Ewa Beach 96706

I want to make a comment on the Draft environmental impact statement up for public review at this time. I would like this comment to be answered.

My comment is that with the ^{City} state and national economy sputtering and tax revenues being reduced dramatically the original funding for the rail system won't be enough to now build it. Property taxes are going to go down so the city can't tap into that. The state won't raise the Get another 1/2% so where is the city going to get the difference between the original GET revenue and the new forecasted lower revenue?

In this same area, if property taxes go down because valuations have gone down, how will the city pay for the operating and maintenance expenses on this system which will be substantial?

Please respond with your answers:

Pam Smith
P.O. Box 2242
Ewa Beach, HI 96706
392-5559

cc Ted Mathey
Gov Linda Lingle

Pam Smith
RECEIVED
08 DEC 9 P12:34
TRANSPORTATION SERVICES

Kaka'ako Business and Landowners Association

P.O.BOX 898

Honolulu, HI 96808

Tel: (808) 597-1102 Fax: (808) 591-6634

Mr. Ted Matley
U.S. Department of Transportation
Federal Transit Administration -- Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

November 28, 2008

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

Re: Request to extend the January 7, 2009 deadline for comments on the Honolulu High-Capacity Transit Corridor Project Draft EIS/Section 4(f) Evaluation

Dear Messrs. Matley and Yoshioka,

Kaka'ako Business and Landowners Association is a group of small businesses and landowners in Central Kaka'ako. We are requesting that the deadline for the comment period be extended two months beyond the January 7, 2009 deadline.

We will all be greatly impacted by the transit route through and stations in Kaka'ako. Some of us will be impacted more than others because of partial and full property condemnation. So it is important for us to try to understand the details of the draft EIS in order to submit comments. We do not have the expertise in this field nor do we have the staff to study the draft EIS. It will take us time to absorb all that is in the EIS. But because we are small businesses owners, we spend all of our time on our businesses and in these difficult economic times, it is all the more important that we keep an eye on our business. Compounding the issue is that December is the busiest time of the year for us and in January, many of us are closing our books for the fiscal year. We cannot afford to neglect our businesses.

By extending the comment period two months beyond January 7, 2009, it will let us past the holidays and our year end closing and also give us the time to learn about the EIS process and to make sensible comments.

Your consideration will be greatly appreciated.

Sincerely



Dexter Okada

RECEIVED
NOV 29 2 11:15
DIRECTOR'S OFFICE
U.S. DEPT. OF
TRANSPORTATION SERVICES



General Growth Properties, Inc.

December 3, 2008

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

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

Dear Mr. Matley and Mr. Yoshioka,

General Growth Properties (GGP) has begun its review of the Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement/Section 4(f) Evaluation and is aware of the request for comments by January 7, 2009.

GGP's properties at Ward Centers and Ala Moana Center will both be impacted by the transit project. We request an extension of the comment deadline to allow us to fully study the impacts. An extension is needed to allow sufficient time to review all of the documents and secure the assistance of any necessary consultants. The current timeframe for review runs through a very busy holiday period, which will make it difficult for affected businesses and residents to provide meaningful input.

We respectfully request that the deadline for comments be extended by an additional 75 days to March 23, 2009. Thank you for your consideration of this request.

Sincerely,

Jan Yokota
Vice President-Development, Hawaii Region

RECEIVED
DEC 5 11:35
DIRECTOR'S OFFICE
TRANSPORTATION SERVICES

Limited Partnership
1441 Kapiolani Blvd., Ste 202
Honolulu, Hawaii 96814
**Development Design
& Construction**
Hawaii Region
Phone 808-947-3788
Fax 808-947-3980
www.ggp.com

TELL IT TO THE MAYOR

RECEIVED
CITY OF HONOLULU
CUSTOMER SVCS DEPT.

A SUGGESTION PROGRAM

If you have a suggestion, idea or complaint, Tell It to the Mayor.

We've received some great ideas from this program - ideas which have saved money and helped us deliver better service.

All suggestions and complaints are confidential. By including your name, address and a daytime phone number, we are able to respond to you, if necessary.

Thanks for helping us serve you better.

Mufi Hannemann, Mayor
City and County of Honolulu
INTERNET: www.honolulu.gov

SUGGESTION: Have the rail system but not steel on steel
because of our salt water air.
Also have one of the first routes from the leeward
and central areas to the University of Hawaii Manoa because
if you have ever seen the improvement in traffic
(currently) it is when the University of Hawaii system
is not in session.

RECEIVED
CITY OF HONOLULU
CUSTOMER SVCS DEPT.
09 JAN -6 10:52

JAN 03 2009

PEARLRIDGE SATELLITE CITY HALL

Karen Shimomura
NAME (PLEASE PRINT)
94-453 Muleku Street Mililani Hi
ADDRESS 96789

1/3/09
DATE
Pearl Ridge
SUGGESTION BOX LOCATION

Thank You

Michael P. Rethman
47-140 Heno Place
Kane'ohe, Hawai'i 96744-5608

December 28, 2008

Mr. Wayne Yoshioka,
Director, Dept. of Transportation Services
City and County of Honolulu
650 South King Street
Honolulu, HI 96813

Aloha Mr. Yoshioka:

RE: Draft Environmental Impact Statement for proposed Oahu train
transit system

Please include my comments/questions among those regarding the EIS
now underway.

Although I believe that there **are** a few good reasons to build an elevated
rail transit system on Oahu as well as plenty of good economic, cultural
and esthetic reasons **not** to build it, please consider and answer the
following questions:

- 1) What happens when the electricity fails island-wide for 10-20 hours
as has happened twice in the past two years? Will hundreds or
thousands of folks find themselves trapped on trains? Will there be
a police or other quick-response force devoted specifically devoted
to the transit system crime or mechanical failures as exist
elsewhere? Is this need budgeted?
- 2) If the system has backup power capabilities, have these been
included in the budget and are these facilities part of the EIS?
- 3) Even with no blackouts, how/where/when will Oahu generate the
additional electricity needed to power the trains? (It's my
understanding that Oahu already faces problems associated with
meeting its peak-load electrical demands.)

Thanks for considering and answering these pertinent questions.

Sincerely,

Michael P. Rethman
239-7972

DIRECTOR'S OFFICE
CITY AND COUNTY OF
HONOLULU
DEPARTMENT OF
TRANSPORTATION SERVICES

50 DEC 31 A12: 23

RECEIVED

M. KERR
3810 Leahi Ave. #204
Honolulu, HI 96818

*Pls place on
Mayor's desk
Thank
you*

Monday, November 10, 2008

Dear Mayor Hanneman and Mr. D'Jou:

Pls accept my feelings on the rapid transit that now has been voted in. I am from Vancouver, Canada, where of course we have an outstanding system, I believe Honolulu is basing their system on Vancouver's. I am used to riding the VCR system and it is outstanding, My big fear is that Honolulu won't get it right. I ride the BUS occasionally to my job at Kaiser Hosp and find the bus to very inefficient, and so I am afraid that the train will be inefficient.

I feel the only way to get an efficient train is to make sure that the "good of the whole" is served and not just a minority group ie: Salt Lake residents. If the good of the whole population is served, then there will be links to the airport, UH, Ala Moana and Waikiki. If the city decides to go with what is good for the minority, I see a very inefficient system with low ridership and a waste of taxpayer's money and I would be resentful of my tax dollars going to fund a system that serves the minority.

Putting a link to Salt Lake and not the airport would be the height of stupidity. It would symbolize that we are NOT a progressive city. Every progressive city links rapid transit to the airport. Honolulu, especially, should have a link to the airport, as tourism is our number 1 industry. Right now you cannot take luggage on the #42 bus to the airport which is ludicrous, it does not make sense. In Vancouver, you can take luggage on the airport city bus routes and they are also building an airport link that arriving tourist can take right to downtown in 22 min.

Mr Cachola may need to understand that Honolulu must do what is best for the whole/majority of the island and that just because his constituents want a link to Ala Moana mall to spend the day is not a reason to put a SL link in before serving the airport. The majority must be served before the minority is served.

Mr. Hanneman, please get it right and do the right thing with the links, and please also allow luggage on the train. Having a train to the airport and not allowing luggage would be ludicrous. Also, luggage should be allowed on the city bus that will link to the train. Please make this a modern and efficient and user friendly to the people system.

Thank you, Anna Kerr RN at Kaiser Hospital and resident of Diamond Head area
924-6694

NOV 23 9:23
DIRECTOR'S OFFICE
TRANSPORTATION SERVICES

RECEIVED

*11-20-08
This is a copy of a letter I
sent to the mayor & my city council
person. Thank you.*

RECORD # 410 DETAILS

Status : Initial Action Needed
Creation Date : 1/15/2009
Creator Affiliation :
First Name : Daniel
Last Name : Ogura
Business/Organization : none
Address : 1919 citron st. #301
Alternative Preference :
Apt./Suite No. : 301
City : honolulu
State : HI
Zip Code : 96826
Email : danielogura@ureach.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 01/15/2009
Submission Content/Notes : I would like to find out address of properties in Mccully Moilili area that will be for rail station. I looked at map and one spot looks like ala wai park next to Kapiolani and Mccully. that would be great because it would not affect apartment rentals

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 411 DETAILS

Status : Initial Action Needed
Creation Date : 1/15/2009
Creator Affiliation :
First Name : Melissa
Last Name : Crisostomo
Business/Organization :
Address : 95-1011 Liho St.
Alternative Preference :
Apt./Suite No. :
City : Mililani
State : HI
Zip Code : 96789
Email : rolmelcrsstm@hawaiiantel.net
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 01/15/2009
Submission Content/Notes : Have you considered the effects of global warming and the rising of the sea levels in the next 50 years? If the sea level rises approx. 20 feet (6 meters), then many of the areas where the transit area will be running will be under water. See this weblink to the Hawaii Mapping Research Group working with the UH School of Ocean and Earth Science and Technology (SOEST) : http://www.soest.hawaii.edu/hmrg/FloodingOahu/stepbystep_oahu.php
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

To: Rail Route Comment Collectors.

Re: Salt Lake vs. Airport routes.

08 NOV 24 P1 31
DTS
RAPID TRANSIT

1. Go to both places.

a. There are supporters for both routes. Enough to say support justifies spending 1/2 \$Billion. or whatever to cost.

b. Go cost less if you go both places in the same phase instead of later as a spur.

2. Get one uddah reason. To change, go Airport and tell Romney and Salt Lake Tough shit go convince more of us to not trust Mufi and his cabinet. Even the guys who stay stuck selling this outrageously expensive project. who are civil Service.

3. How long you think people go accept governments telling us "Life is not fair, suck it up and shut up"?
NO MO Bus SERVICE! Now we gotta pay even more taxes to get NO SERVICE?! (For Rail)

Aloha
Alex

Chang, Deanna

From: Leonard Withington, Jr [makikistop@yahoo.com]
Sent: Friday, November 21, 2008 4:43 PM
To: Chang, Deanna
Subject: PLEASE SUBMITT TO RECORD

08 NOV 24 A9:15
DTS
RAPID TRANSIT

Thanks for taking my call. Testimony forthcoming
To the committee on Transportation and Public Works

November 15, 2008

SALT LAKE VS AIRPORT ROUTE (REAL SERVICE TO REAL COMMUTER USERS)

I wish you would listen to the Salt Lake/Ali'amanu/Foster Village neighborhood board members testimony. They have spent a lot of effort to work with Romy C

History

For 18 years (1977 to 1996) I was a resident of Salt Lake. Back in the 70' and 80' Councilperson Donna Mercado Kim vastly improved the bus line #12 (Presently the #3.) Due to these great improvements, the Moanalua/Salt Lake/Ali'amanu communities improved real service to real commuter users. I have used mass transit for 14 years now. The service is excellent.

Airport/Hickam/Pearl Harbor History

We've always had poor bus service to this area. Only Nimitz and Kam highway service is used. Bus #19 to Airport/Hickam travels every hour To enter Hickam the rider must have a US Government ID on the bus. Bus #9 provides hourly service to Nimitz Gate only (Big deal). Bus #9 goes on the base only during the regular commute hours and must also have a Government ID.

The #20 and #42, plus the Kam highway routes go by the airport and Pearl Harbor, provide spotty airport visitor bus service. Luggage service on all busses is discouraged (restricted). Will visitors with luggage be allowed on hub and spoke bus service from Ala Moana Shopping Center to Waikiki hotels?

Market Analysis

I really think the survey which says that 7,000 more riders will use the Airport Route is flawed. I would think the Salt Lake corridor would be 7,000 more ridership than the

11/24/2008

Airport route. Customers from Halawa Heights, Red Hill, Foster Village, Moanalua Valley, Salt Lake and Ma'punapuna would utilize the hub and spoke bus service to the Salt Lake Blvd rail corridor. They will not drive to Pearl Harbor or Damon Track (Airport) areas. What makes the high speed rail work is high speed between terminals and limited stops. I really think 19 stops are too many.

If you are going to have a hub and spoke bus service with "park and ride" facilities at the stations, you can cut back 5 – 6 stops, so that the 40 minute ride becomes a 30 or 35 minute commute to the bus transfer stations. Start to stop xxxxx Kapolei to AMC

Remember Express Route A. The original UH (Sinclair Library) to Kalihi Transit Center provided limited stops, every 10 minutes. This system worked real well. They then added the Waipahu final destination and put stops at McCully Kamakee, Kokea, Gulick streets slowing the service down. That really screwed up the A Express Route. Once again we need limited stops and high speed. The new rail route would be from Aloha Stadium to Iwilei is much faster than the airport.

Be real when it comes to moving the masses with speed

The successful mass transit systems should move all customers with speed. Why else have an expensive system. Proven good service will change most car riders to consider alternative forms of transportation.

Leonard Withington, Jr.
1326 Piikoi Street #202
Honolulu, HI 96814
e-mail makikistop@yahoo.com
(808) 535-9779

11/24/2008

24 November 2008

Mr. Wayne Yoshioka P.E. Director
Department of Transportation Services
650 South King Street 3rd Flr.
Honolulu, H 96813

SUBJECT: Honolulu High Capacity Transit Corridor Project, Draft EIS

Dear Wayne:

Thank you for allowing me to comment on the draft EIS. I look forward to your response to my comments below.

1. The Honolulu Advertiser (11/20/08) reported that limited rail service will become available in 2013 between West Loch and Waipahu. Is this the first construction phase of the project and is this equivalent to construction of the rail system between the West Loch Station and the Waipahu Transit Center as depicted in the draft EIS maps (Fig. 2-6)?
2. Figure 2-5 shows the rail following the North-South Road, then veering east across the proposed Hoopili project area, makai of Farrington Highway. However if you visit the DR Horton/ Hoopili web site they show the rail going all the way up to Farrington and then turning east following the Farrington alignment. Which is correct?
3. Table 4-1 (land use) states that 145 to 165 acres of existing land uses need to be converted to "transportation use." What is transportation use? Is this a new land use category, a new zoning designation?
4. Little is discussed in the draft with regards to the park and ride facilities. What kind of parking capacity will they have? Will they be at grade lots or multi-level structures? Will any special design guidelines be created for them or will only the existing LUO standards be used? Will fees be charged for parking? How much?
5. I understand that the rail superstructure will be approximately 30 ft. in height. Is this to the top or bottom of the superstructure?

Yours Truly



Michael S. Chu
126 Queen Street Suite 306
Honolulu, HI 96813
mchu-lpd@hawaii.rr.com

DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION SERVICES

00 NOV 20 9:49

RECEIVED

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR



November 12, 2008

RECEIVED
08 NOV 21 12:37
WAYNE YOSHIOKA
DIRECTOR
RICHARD F. TORRES
DEPUTY DIRECTOR
DIRECTOR'S OFFICE
EIS, OF
TRANSPORTATION SERVICES

Dear Participant:

Subject: Honolulu High-Capacity Transit Corridor Project
Draft Environmental Impact Statement/Section 4(f) Evaluation

Attached for your review and comment is a Draft Environmental Impact Statement (EIS)/Section 4(f) Evaluation prepared pursuant to the National Environmental Policy Act, Section 4(f) of the U.S. Department of Transportation Act of 1966, State of Hawaii EIS Law (Hawaii Revised Statutes, Chapter 343) and the State of Hawaii EIS rules (Hawaii Administrative Rules, Title 11, Chapter 200).

TITLE OF PROJECT: Honolulu High-Capacity Transit Corridor Project

LOCATION: Island of O'ahu, Honolulu and 'Ewa Districts

TAX MAP KEY NUMBERS: 1-1-2,3,4,6,7,10,35,64,71; 1-2-3,9,13,17,18,26; 1-5-7,15,20,21,28; 2-1-14,27,30,31,50,52; 2-3-2,4,7,38,39; 9-1-16,17,18; 9-4-8,11,17,19,47,48; 9-6-3,4; 9-7-22,23,24; 9-8-9,14,15; 9-9-1,2,3,48,71,76: various parcels

AGENCY ACTION: X

APPLICANT ACTION:

Your comments must be received or postmarked by January 7, 2009.

Please send original comments to:

MARK R JAMES
Return Address:
2911 PAC. HTS RD
HON HI 96813

Mr. Wayne Y. Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813
(808) 768-8303

Please send copies of comments to OEQC and to:

Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, California 94105
(415) 744-3133

Thank you for your assistance in this important project.

11/19/08

Dear Mr. Yoshioka,

*I Agree 100% w/ the Article from Mr. Rick Hamada,
Midweek MAG. 11-19-08. We need A equitable
Assessment of the details D E I S from Fed. Govt.*

CC: Mr. Ted Matley

*THANK YOU
MR JAMES*



A CONSERVATIVE ESTIMATE Rick Hamada

More of Mufi's Rail Deceptions

Well, Romy, welcome to the club.

Mayor Mufi Hannemann shook the hands of Cachola and Salt Lake representatives in promising the rail route would run along Salt Lake Boulevard. He needed Cachola's vote, and the rail re-route from the airport, to his district raised allegations of political gladhanding. It clearly was a political maneuver that became the calling card of the entire project.

Just as the decision to award the route to Salt Lake was a little smelly, the ballots weren't even dry when the mayor, and a select group of councilmembers, flipped Romy and Salt Lake the bird and re-routed the rail back to the airport.

I mean, really, is anybody surprised?

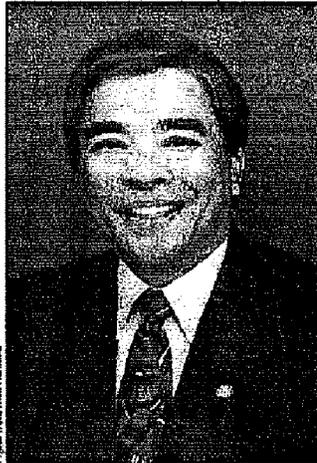
Romy made a backdoor deal and got hit in the okole when it was slammed shut by the mayor. As they say, if you are going to play in the mud, you're going to get dirty. Cachola put the mayor on the line with threats of pulling his vote, and Mufi let Cachola think that he got rail for Salt Lake Boulevard.

I don't think there was one fleeting moment when the mayor knew if rail got the vote that he would honor his agreement.

Councilman Cachola is just one in a long line of those who feel betrayed by the rail process. First and foremost, the whole propagandistic indoctrination of the people with ad nauseum pro-rail commercials ranks as one of the most blatant and outrageous voter-manipulation episodes ever seen in Hawaii. The combination of taxpayer money and special interest money was a staggering amount. There was a paucity of fair-

ness and equality. Save the federal involvement. I am not confident that the discussion of the DEIS will be above reproach.

All the reasons for opposing this project exist. The route, the cost, the impact and the alleviation of congested roadways still remain salient and relevant issues. I believe this multi-billion dollar project is a wonderful vehicle to enrich a few at the expense of the many. This is a make-work project to keep a select group of residents employed while being subsidized by their neighbors. This is not an economic stimulus project. It is a government redistribution of wealth project.



City Councilman Romy Cachola is upset that he was deceived about the rail project.

I understand the polls have spoken. I respect the process w respectful to us. The DEI process provides for adding a public input. The ramifications of this project demand precise public discussion without a grant favoritism from either side. The public deserves the opportunity to participate in the ongoing process and reserves the right to act accordingly if relations about the project compel them back to the poll. Remember, there are tens of thousands of signatures on the Stop Rail Now ballot that could be expanded, thereby placing the question of rail on the 2010 ballot. The rail project is not a dot deal.

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RECORD # 418 DETAILS

Status : Initial Action Needed
Creation Date : 1/16/2009
Creator Affiliation :
First Name : Jayne
Last Name : Kim
Business/Organization : Eki Cyclery
Address : 1603 Dillingham Blvd
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96817
Email : eki@aloha.com
Telephone : 808-847-2005
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 01/16/2009

- Submission Content/Notes :** 1) We are lessees on Kamahameha Schools property on Dillingham and attended the meeting held at KS on 12/18/08. We occupy TMK: 1-5-28:66 and it looks as though a pillar will be right in front of our showroom window. We are wondering if this is correct and if so, can the location of that pillar be revisited? If you move 30-40ft ewa, it would be in front of our bldg wall, and if you move 50-60ft dhead it'll be in front of a parking lot. How big are the pillars?
- 2) What will visibility be like for motorists as they travel Dillingham looking for businesses? Will they be able to see our current signage? If not, how will the city address this?
- 3) Our business will be impacted. How much so is anyone's guess. Will we be compensated at all with relief from RPT perhaps? And has this all been figured into the budget?
- 4) At what point will we be informed as to how much of our front parking lot will be affected? When the BRT talks were in the works, 6 - 7 ft (of our pkg lot to be condemned) was what we were hearing. Will the city be paying for the repaving of our entire parking lot?
- 5) When the Board of Water Supply dug up Dillingham a few yrs ago, we arrived one morning during the Christmas season to find that they had closed off entry into our parking lot. We hope the city will be more sensitive to retail businesses on these kinds of issues.

Thank you!

Yes

Draft EIS Comment

Reply Requested :

Submission Type :

FOIA (Freedom of Information Request) Request :

FOIA Referral Date :

FOIA Response Date :

RECORD # 419 DETAILS

Status : Initial Action Needed
Creation Date : 1/16/2009
Creator Affiliation :
First Name : rick
Last Name : brown
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 98682
Email : icetecllc@yahoo.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 01/16/2009
Submission Content/Notes : I am looking for information on your light rail maintenance management plan, along with full time employment working in a management position in the maintenance or the rolling stock and track system.

Mahalo.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 420 DETAILS

Status : Initial Action Needed
Creation Date : 1/18/2009
Creator Affiliation :
First Name : Bill
Last Name : James
Business/Organization : JPods LLC
Address : 5255 Stevens Creek Blvd
Alternative Preference :
Apt./Suite No. : 137
City : Santa Clara
State : CA
Zip Code : 95051
Email : bill.james@jPods.com
Telephone : 612.414.4211
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 01/18/2009

Submission Content/Notes : According to DOE:
Trains use 2,996 BTU's per passenger-mile.
Cars use 3,512 BTU's per passenger-mile.

Cars and trains are nearly equally wasteful and harmful to the climate.

Personal Rapid Transit (PRT) sets an efficient paradigm shift. Read Congressional Office of Technology Assessment study PB-244854 for background. There are numerous additional studies.

Morgantown's PRT network has delivered 110 million injury-free, oil-free passenger miles.

Our version of PRT, JPods use 433 BTU's per passenger-mile, efficient enough that solar collectors 6-foot wide mounted over the rails gather 5,000 to 12,000 vehicle-miles of power per mile of rail per typical day.

We can build a demonstration unit in Hawaii within 5 months if you will grant rights of way. We will build this unit with private capital.

In 6 years we can displace 70% of oil-based transportation in Honolulu. Here is link to our response to San Jose's request to build such networks:
<http://www.jpods.com/JPods/007Cities/SanJose/SanJoseJPodsProposal2008All.pdf>

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 422 DETAILS

Status : Initial Action Needed
Creation Date : 1/18/2009
Creator Affiliation :
First Name : rick
Last Name : brown
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : WA
Zip Code : 98682
Email : rustyblades63@yahoo.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 01/18/2009
Submission Content/Notes : when will you update your wed site and do you have a time line for the project constuction, and when will you start the maintanance facility planning.

Mahalo.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 424 DETAILS

Status : Initial Action Needed
Creation Date : 1/19/2009
Creator Affiliation :
First Name : kenny
Last Name : smith
Business/Organization : none
Address : 3178 "T" st
Alternative Preference :
Apt./Suite No. :
City : sacramento
State : CA
Zip Code : 95816
Email : kenny2154@att.net
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 01/19/2009
Submission Content/Notes : i just wish you can be a little bit more open with me when it comes to the service you are trying to start up on oahu hi.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Honolulu Hale
530 S. King Street
Honolulu, HI 96813

1039 Luapele Drive
Honolulu, HI
December 11, 2008

244656
09 JAN 12 AB:32

DIRECTOR OF BUDGET
& FINANCIAL SERVICES
CSC OF HONOLULU

Dear Mayor Mufi Hanneman,

My mom, dad, and I waste a lot of time going to places across the island such as Ewa Beach and Hawai'i Kai for parties and get-togethers because of traffic. The roads will probably be more congested in the future, and that will eat up even more of our time. My parents sometimes don't want to pick me up from school because of the traffic, and I'm left finding my own ways of transportation home. If a rail transit were built, I would have a new way to get home and my family and I would save loads of time.

Although this rail transit may benefit me, I feel that it won't benefit everyone else. The cost of making this rail transit, 3.7 billion dollars, is way too expensive. We are already in a recession. I don't want our economy to be in even worse shape just because we are worried about too much traffic on our roads.

Worst of all, I feel that the transit will be more harmful than beneficial, too. After looking up how the rail will affect the environment, I found that it would actually take up more energy and release more emissions than the number of cars the rail is meant to replace! I know that it has already been approved to be built sometime in the future, but please, if you may, keep Hawaii's beautiful environment first on your mind while constructing it.

Sincerely,

Bryan Pineda

Bryan Pineda

Fr: Bryan Pineda
1039 Luapele Dr.
Honolulu, HI 96818

Agcaoili, Jennifer

From: Mary Reuter [maryrr@hawaii.edu]
Sent: Wednesday, November 26, 2008 8:29 AM
To: Mayor Mufi Hannemann
Subject: Transportation, Rail and Bike

Dear Mayor Hannemann,

I am a citizen of Moili'ili, an elementary school teacher, and a journalism student at UH interested in writing an article about the bike situation here in Honolulu.

I read a quote where you said " The experience of other cities demonstrates that transit systems spur growth, particularly in the areas surrounding the transit stations. We hope that new housing, particularly affordable housing, will spring up along the transit route. We want businesses and leisure activities to be attracted to these hubs. We want to create an environment that supports open space and stimulates walking and bicycling, rather than driving. We want to create neighborhoods where people can live, work, and raise their families."

I support rail, mainly because I born in Washington DC where I used the metro daily. Now that I live in Honolulu, I bike everywhere.

When I read this quote, and that you want to create an environment that supports open spaces and stimulates walking and bicycling rather than driving. As a bicyclist I find it very difficult to navigate outside of the designated bike routes, lanes, and paths. I can get to the University of Hawaii at Manoa from my home with ease (at least once I cross Kapiolani and get on University ave) but I can't go down Kapiolani Boulevard or to Ala Moana with out riding on the sidewalk. I don't even see big strong guys ridinig their bikes on the street down Kapiolani Boulevard.

I read recently about a proposed Bike Share program by Momentum in the Honolulu Advertiser. If a Bike Share program is installed around the TOD areas, will more designated bike routes be established? How do you feel about more designated bike routes, especially in areas such as Kapiolani Boulevard and Waikiki, where currently I can think of only the Ala Wai and the area around the zoo?

Bicycling is certainly among the most sustainable ways to travel, and a fantastic way to enjoy the beautiful weather of our Hawaii.

I would hate to see tourist fatalities increase because they're being hit by cars while riding their bikes. What do you think about this issue?

Concerned Citizen,
Mary Renee Reuter

12/3/2008

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

1000 ULUOHIA STREET, SUITE 308, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3486 • FAX: (808) 768-3487 • WEBSITE: <http://www.co.honolulu.gov>

MUFI HANNEMANN
MAYOR



January 7, 2009

DIRECTOR
KENNETH A. SHIMIZU
DEPUTY DIRECTOR
ROSS S. TANIMOTO, P.E.
DEPUTY DIRECTOR
IN REPLY REFER TO:
PRO 09-001

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

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

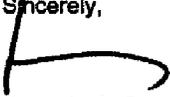
Dear Messieurs:

SUBJECT: Honolulu High-Capacity Transit Corridor Project
Draft Environmental Impact Statement/Section 4(f) Evaluation,
November 2008

Attached are the review comments from the Department of Environmental Services.

If you have any questions regarding these comments, the responsible individuals and their phone numbers are listed above their respective comments.

Sincerely,


Kenneth A. Shimizu
Deputy Director

Attachment

DIRECTOR'S OFFICE
CITY AND COUNTY OF HONOLULU
DEPARTMENT OF ENVIRONMENTAL SERVICES

09 JAN 8 PM 12:24

RECEIVED

Document Name: Honolulu High-Capacity Transit Corridor Project, Draft Environmental Impact Statement/Section 4(f) Evaluation
 Document Date: November 2008

Reviewer: Storm Water Quality Branch
 Contact: Gerald Takayesu, Branch Head
 Phone: (808) 768-3287
 Date: December 24, 2008

Index	Section	Page No.	Comment	Response
1.	Chapter 343 Draft EIS Summary Sheet	N/A	No city permits?	
2.	Executive Summary	S-7	Water Resources – Need to mention BMPs to minimize pollution during construction.	
3.	Chapter 4	4-9	Environmental Effects, Proposed Mitigation Measures – Need to address BMPs during construction and spill prevention.	
4.	Chapter 4	4-125	Environmental consequences common to all alternatives – Wouldn't construction related pollution and contamination be less under the no-build alternative?	
5.	Chapter 4	4-127	Regulatory context for Surface and Marine Waters – Need to mention TMDLs for water quality limited segments listed under the State Section 303(d) list and corresponding waste load allocations to the City.	
6.	Chapter 4	4-128	Affected Environment, Surface and Marine Waters, Streams – Draft EIS mentions Section 303(d) list of impaired water bodies. Should mention TMDLs and waste load allocations to the City.	
7.	Chapter 4	4-132	Environmental Consequences, Surface and Marine Waters – EIS mentions typical post construction BMPs, but should also address BMPs during construction.	
8.	Chapter 4	4-162	Storm Water Quality – Need to address permanent post-construction BMPs.	

Document Name: Honolulu High-Capacity Transit Corridor Project, Draft Environmental Impact Statement/Section 4(f) Evaluation
Document Date: November 2008

Index	Section	Page No.	Comment	Response
9.	Chapter 4	4-174	Water Resources – Need to correct statement that “Water resources have been degraded by past residential and farm development.” Much of the degradation is also due to industry and the military.	
10.	Chapter 4	4-176	List of Anticipated Permits – Might consider adding State NPDES industrial permits and hydrotesting permits; DPP building, grading, stockpiling, and construction dewatering permits; and ENV effluent discharge permits for hydrotesting.	

Document Name: Honolulu High-Capacity Transit Corridor Project, Draft Environmental Impact Statement/Section 4(f) Evaluation
Document Date: November 2008

Reviewer: Office of Administrative Support
Contact: Lisa Kimura, CE V
Phone: (808) 768-3455
Date: January 5, 2009

Index	Section	Page No.	Comment	Response
1.	General	N/A	ENV requests to be included in the review of design documents and construction plans, to review for impacts to our facilities and services, and for coordination with on-going and proposed wastewater system projects.	
2.	General	N/A	Please note that the proposed alignment(s) either cross or run parallel to the following sensitive wastewater facilities: <ul style="list-style-type: none">• Waimalu Force Main• Halawa Force Main• Aliamanu Force Main #1• Aliamanu Force Main #2• Fort Shafter Force Main• Kamehameha Highway Force Main• 30-inch trunk sewer near the Aloha Stadium• Awa Street Force Main• Beachwalk Force Main	

To: Mr Wayne Y. Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96853

From: Dr Aaron Hebshi
University of Hawaii, Manoa, Bicycling Committee, Chair (Former)
1045A Kalikimaka Street
Honolulu, HI 96817
hebshi@hawaii.edu

Subject: Comments to Honolulu High-Capacity Transit Corridor Project, Draft Environmental Impact Statement/Section 4(f) Evaluation

General comments

UH route is critical. Students are poor, rent around the University is extravagant. Many students work extra jobs to pay for their car (or high rent around UH). As a former Teaching Assistant at the University, it was very obvious that many of the students did not take the necessary time to study at home, possibly in part due to the requirements for working extra time to pay high transportation/rent costs.

A well-lit bicycle hub with showers and theft-deterrents was described as part of the UH Campus Master Bike Plan (2003). Although this plan has not been implemented due to lack of funding, coordination between the city and UH can capitalize on existing schemes to build of a joint bicycle hub at the potential rail transit station planned for UH.

Specific Comments

Page 2-20, "Operation Parameters". I wholeheartedly agree that bikes should be allowed on the trains. Bikes can extend the sphere of ridership by providing crucial options for users to get to and from transit stations. For instance, bicycles can be used to get an individual from home to a transit station, and once at the station, the individual would have the option of parking the bike at the transit station (if the bike is not required post transit ride) or bringing the bike onto the train (if the bike is to be used post transit ride). Concerns with safety can be alleviated by only allowing bikes on designated cars or in designated sections of cars.

Page 2-24, Column 1, 1st paragraph, lines 3-4. I wholeheartedly agree that bike parking should be provided at every transit stop. Bike parking should be well-lit, secure, and preferably covered from the rain. One of the biggest impediments to bike usage in Honolulu is the high bicycle theft rate. I would recommend installing safety/security personnel at the transit stops, and include in their duty bicycle theft protection.

Page 3-23, Table 3-13 and related text. I would venture that this is a minimum projected benefit, since it doesn't take into account rising gas prices, which will undoubtedly occur again when the global economy picks up.

Page 3-34, Table 3-18 and related text. Was any survey conducted to estimate the importance of bikes as a mode of transportation to access transit stations? And what would be the maximum distance at which an average transit rider would be willing to access stations via walking or via biking? In other words, a non-transit dependent person may be more willing to ride transit if a station can be accessed within 5 minutes of his/her house and also his/her destination. The sphere of accessibility within 5 minutes using a bicycle is much larger than that for walking. I would anticipate seeing hidden benefits not unveiled in this EIS if bicycle ridership is highly encouraged.

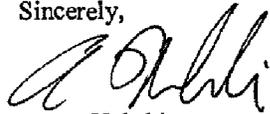
Page 3-43, Table 3-24 and related text regarding removal of bicycle lane on Salt Lake Blvd and replacing with shared use lane. The bicycle community has varied opinions on the relative utility of bike lanes vs. shared use lanes. Less experienced/comfortable riders find that bike lanes provide them more confidence and sense of security, and are more willing to use the facility than a shared use lane. More experienced riders are comfortable with either type of facility.

Page 3-43, Table 3-24 and related text. Was any engineering scheme explored whereby the elevated portions of the guideway could have a bike path system travelling underneath it? The city/state should take advantage of any opportunity to increase the miles of bicycle travel facilities.

Page 3-48 and 3-50, section 3.5.5. I appreciate your efforts to mitigate for construction-related effects on pedestrians and bicycles.

Please direct any questions to my address above.

Sincerely,



Aaron Hebshi

cc

OEQC

Mr. Ted Matley, FTA Region IX

Jaime Kurosawa
99-1440 Aiea Heights Drive #33
Aiea, Hawaii 96701

Date: January 5, 2009

Mr. Wayne Yoshioka
Director
Department of Transportation Services
City and Count of Honolulu
650 South King Street, 3rd floor
Honolulu, HI 96813

Reference: Rail Draft EIS

Dear Mr. Yoshioka,

I am a concerned tax payer and I am also against the rail. I feel that I was misled and misinformed. The fact that the EIS draft was made public a few days before the election concerns me because of the many people who cast their vote via absentee/early ballot. The vote for and against rail was too close and I feel that if the public was given this information sooner, the vote could have possibly turned out different.

I am very angry and would like to know in writing how the City and County can let this kind of thing happen?

Please respond to me in writing.

Sincerely,



Jaime Kurosawa

DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION SERVICES

09 JAN 8 PM 12:24

RECEIVED

Cc: Ted Matley FTA Region IX 201 Mission St. Suite 1650 San Francisco, CA 94105
Cc: Governor Linda Lingle Hawaii State Capitol 415 S. Beretania St. 5th Floor Honolulu, HI 96813

January 6, 2009

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

Dear Mr. Yoshioka:

My comments for the EIS report.

I do have to drive around our city streets every day and almost everywhere I go bumpity bump and it bothers me that our road maintenance is so poor. It bothers me because you think it is nothing to spend these billions of dollars on the train and let our roads go to pot. It also tells me that in the future, our train and stations will not be maintained properly, too. Do you know that San Francisco's Bart is not reliable and that there is millions of dollars maintenance backlog on the BART? Bet this is the scenario for Honolulu too.

We need a billion + dollars for our sewer system to meet EPA standards. I stopped buying locally caught akule for my mother because the skin felt very slimy and the gut was huge, fat, wormy looking. (Returned fish to the store) I dare say that it was caught near the sewer outfall area. Fixing the sewer system is a MUST.

We also must have aging water pipes because we have so many water main breaks. We lose a lot of our good precious water; therefore, we must have a system of replacing these aging pipes.

To maintain our sewer and water system is a PRIORITY. People's health and welfare depends on it.

What I don't like about the train too is that is to be elevated. Plus steel on steel is very much old fashioned. Heavy steel train on elevated tracks is just ugly and very un-Hawaiian.

Most of all it is too big a cost burden for the people of Oahu - even if you get some Federal monies for building it; where is the money for the operating and maintaining coming from? Also where is the money for the acquisition of property coming from? It does not appear that the finances justify this huge, unrealistic expenditure for the City. Your projections for rider ship and finances are skewed like it was on all the huge projects elsewhere.

You know that there are other ways of solving the traffic problem without spending so much money but you are not looking at them. Where is your creativity?

Mahalo and Aloha,
Ruth Nakasone
Pearl City, HI 96782

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

Governor Linda Lingle
Executive Chambers
Hawaii State Capitol
Honolulu, HI 96813

RECEIVED
09 JAN 8 PM 24
LINDA LINGLE
EXECUTIVE CHAMBERS
HAWAII STATE CAPITOL
TRANSPORTATION SERVICES
City Council Member



Natural Resources Conservation Service
P. O. Box 50004
Honolulu, Hawaii 96850
(808) 541-2600

January 7, 2009

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

Thank you for providing the NRCS the opportunity to review the Honolulu High-Capacity Transit Corridor Project, Draft Environmental Impact Statement/Section 4(f) Evaluation. Previously, the NRCS has worked with the City and County of Honolulu and Ms. Amy Zaref, Project Manager from Parsons Brinckerhoff, on this project to provide the Important Farmland information. We assisted in completing a Farmland Impact Conversion Rating Form (AD-1006) for this project. This form is required on projects that convert farmlands into non-farmland uses and have federal dollars attached to the project. See the website link below for more information on the Farmland Protection and Preservation Act (FPPA), and a copy of the AD-1006 form, with instructions.

Another area of potential concern are the impacts on wetlands. The NRCS Soil Survey of Oahu, Hawaii identifies areas of hydric soils. Hydric soils are potential areas of wetlands. If wetlands do exist, any proposed impacts to these wetlands would need to demonstrate compliance with the "Clean Water Act", and may need an Army Corps of Engineers 404 permit. The NRCS Soil Survey Maps are not provided with this report due to the extent of the project area. If you have any questions concerning hydric soils or obtaining NRCS Soil Survey information please contact us at the number provided below.

The NRCS Soil Survey is a general planning tool and does not eliminate the need for an onsite investigation. If you have any questions concerning the soils or interpretations for this project please contact, Tony Rolfes, Assistant State Soil Scientist, by phone (808) 541-2600 Ext. 129, or email, Tony.Rolfes@hi.usda.gov.

NRCS - Farmland Protection Policy Act Website: <http://www.nrcs.usda.gov/programs/fppa/>

Lawrence T. Yamamoto
Director
Pacific Islands Area

Cc
Michael Robotham
Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, California 94105

DIRECTOR'S OFFICE
DIVISION OF
TRANSPORTATION SERVICES

09 JAN 9 12:41

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

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

RE: Honolulu High-Capacity Transit Corridor Project (Draft EIS)

Thank you for the chance to comment. As a property owner on Oahu, I support the general concept presented. I will rely not only on experiences gained from a career as a transportation engineer, but my current status as the interim chair of the Hawai'i County Transportation Commission and a proponent for balanced transportation, smart growth and more livable communities to offer additional comments and recommendations.

As one of several transportation alternatives that would be acceptable solutions for the Honolulu environment, this decision will guide us how to prioritize all of our transportation options. The future remains shrouded and it is truly impossible to determine from the study alone how successful the transit system will become. It will, however, be substantial enough that the government, residents, and visitors will have the resources and ability to steer the system towards ultimate success.

The project as proposed will also help determine how we allocate our valuable and limited energy resources. This may be just as crucial of a decision. Sustainable energy systems will play an increasing role in our island State. Fixed generation from natural or renewable resources will likely play an important role. When fuel sources and generators are not required on board, energy consumption and capacity improve.

This project will also provide us with lifestyle opportunities and options on how we as residents and guests choose to move around. Balancing our time and how productively we use it are important considerations for all of us. How we access our transportation options are also important considerations that will impact our lifestyles. In light of the above comments, I offer the following recommendations for consideration during planning, design, and construction.

RECEIVED
JAN 9 12:41
DIRECTOR'S OFFICE
HAWAIIAN
DEPARTMENT OF
TRANSPORTATION SERVICES

RECOMMENDATIONS:

FIRST. Including direct access to Honolulu International Airport is absolutely essential. This is one of the largest origins and destinations in the State. This is our primary link to the mainland and international markets. It is also a critical portal for interisland travel fulfilling commuting, medical, recreational, and personal needs.

SECOND. Construction must start from the Ala Moana end. This is already a major transit terminal and is an existing TOD providing direct access to shopping, accommodations, recreation, and the convention center. This would also be the physical foundation to advance the planning forward on both additional routes. If financial, environmental, or unknown setbacks occur, a viable transit core remains available.

THIRD. The design must include considerations for accommodating utilities and other facilities. Mounting points and potential loadings should be incorporated in the design to avoid unnecessary future costs and disruptions. The upfront costs would be minor. The large support structure could also carry electric lines, street lighting, communications, architectural lighting, and even replacement water lines. Perhaps the most desirable facility that could be added in the future is an elevated bikeway. Bicyclist would benefit from the same conditions as elevated transit, no intersections. Bicycle usage is increasing and a bikeway would provide additional commuting options, transit access, and a very unique tourism attraction, unparalleled in the world.

Thank you for your consideration,


Robert Ward

Additional Copy:

Director
Office of Environmental Quality Control
235 South Beretania Street, Suite 702
Honolulu, HI 96813

Return Address:

77-6526 Ho'olaupa'i St
Kailua Kona, HI 96740

RECORD # 434 DETAILS

Status : Initial Action Needed
Creation Date : 1/22/2009
Creator Affiliation :
First Name : Kirk
Last Name : Paterson
Business/Organization : Allstate Insurance
Address : 1259 S. Beretania St., Ste 1
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96814
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 01/22/2009
Submission Content/Notes : Of the two proposed alignments, the Airport Alignment seems the most logical to me. Go Rail Go!
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 435 DETAILS

Status : Initial Action Needed
Creation Date : 1/22/2009
Creator Affiliation :
First Name : Betty
Last Name : Wood
Business/Organization :
Address : 1980 Halekoa Drive
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96821
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 01/22/2009
Submission Content/Notes : I support the development of rapid transit for Honolulu.

In my opinion:
1. the train should connect to the airport.
2. construction start with the Pearl City to Honolulu segment and then build out. You'll get more riders immediately.
3. all stations should have elevators or ramps for wheel chairs and bikes.
4. all trains should have bike storage areas.
5. all new transit oriented development zoning changes should support pedestrian and bike access.

Good luck.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 436 DETAILS

Status : Initial Action Needed
Creation Date : 1/22/2009
Creator Affiliation :
First Name : George
Last Name : Lo
Business/Organization : Beyaz & Patel, Inc, Engineers
Address : 800 South Broadway
Alternative Preference :
Apt./Suite No. : suite 200
City : Walnut Creek
State : CA
Zip Code : 94598
Email : glo@beyazpatel.com
Telephone : 925-934-0707
Telephone Extension : 224
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 01/22/2009
Submission Content/Notes : Is it true that after the approval of the EIR, followed by the completion of the PE, the City will put all the segments design to the public rather than are handled by PB alone?
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 439 DETAILS

Status : Initial Action Needed
Creation Date : 1/23/2009
Creator Affiliation :
First Name : Douglas
Last Name : Pothul
Business/Organization :
Address : 203 Akiohala Street
Alternative Preference :
Apt./Suite No. :
City : Kailua
State : HI
Zip Code : 96734
Email : dougpothul@yahoo.com
Telephone : 808-735-7795
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 01/23/2009
Submission Content/Notes : I would like a list of all non-residential properties that will likely be acquired by the City (or other governmental agency) to facilitate the construction and operation of this transit system.

Thank you.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 440 DETAILS

Status : Initial Action Needed
Creation Date : 1/23/2009
Creator Affiliation :
First Name : Sue
Last Name : Jansen
Business/Organization :
Address : 95-205 Paeheu Pl.
Alternative Preference :
Apt./Suite No. :
City : Mililani
State : HI
Zip Code : 96789
Email :
Telephone : 387-7507
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 01/23/2009
Submission Content/Notes : It is much more akamai to have the train route go to the airport. You need a relaxed less stressful way of getting tourists to Waikiki. This will help. Also it makes more sense to start building the train in the more populated or higher potential use area. Starting to build the train in Ewa will not generate much ticket sales and what if the project is put on hold due to lack of funds, etc. Then you have a train only benefiting a few. Start building it at the airport, Waikiki or near UH. And build out from there. I know my ideas will generate extra costs but lets do this the right akamai way!
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 441 DETAILS

Status : Initial Action Needed
Creation Date : 1/24/2009
Creator Affiliation :
First Name : Ed
Last Name : Appleby
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96707
Email : eappleby@hotmail.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 01/24/2009
Submission Content/Notes : We haven't seen much about parking/park-and-ride. It's the most elusive piece of information to answer "will we use it." Is there somewhere in the EIS or elsewhere that specifically addresses this?
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 442 DETAILS

Status : Initial Action Needed
Creation Date : 1/24/2009
Creator Affiliation :
First Name : Daniel C
Last Name : Smith
Business/Organization :
Address : 1816 Dole St.
Alternative Preference :
Apt./Suite No. : B203
City : Honolulu
State : HI
Zip Code : 96822
Email : dancsmith@rocketmail.com
Telephone : 808-951-4632
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 01/24/2009

Submission Content/Notes : I have reviewed the Draft EIS. Although I am neither a transportation expert nor environmental expert, the Draft EIS makes sense. The costs and benefits -- economic and social -- look to be realistically stated. I have experienced the mass transit systems in New York, Atlanta, Paris, Sydney and the San Francisco Bay Area where I grew up. In those areas is clear that efficient mass transit contributes greatly to good quality of life. While I am disappointed that the Honolulu rail system will not initially go to Waikiki, UH Manoa and more places in the Eva Plain, the system is a good start. I applaud the political leadership that recognized that the perfect is the enemy of the good. It appears to me that the big risk in new mass transit is not being ambitious enough. Witness the cost of the BART extension to the San Francisco Airport versus the cost had it been in the original plan. I am pleased that the Honolulu Airport route appears to be on the way to adoption. I say that not just because I work at the airport, but especially because the airport route will also better serve the airport industrial area and Pearl Harbor which as important "industry." Let's get on with it!

Reply Requested : Yes
Submission Type : Draft EIS Comment

RECORD # 443 DETAILS

Status : Initial Action Needed
Creation Date : 1/25/2009
Creator Affiliation :
First Name : Ted
Last Name : Kanemori
Business/Organization :
Address : 46-066 Heeia St
Alternative Preference :
Apt./Suite No. :
City : Kaneohe
State : HI
Zip Code : 96744
Email : ted@tk-serve.com
Telephone : 247-3993
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 01/25/2009

Submission Content/Notes : I am in favor of building the "Minimum Operating System" from the airport area to Ala Moana, starting from the airport, not Kapolei.

Why?

During recent testimony, the question came up, "Where are we going to get the money to build the entire project?"

Under questioning, Wayne Yoshioka said that he guarantees that we have enough money to complete the MOS (Kapolei to Waipahu). What about the rest of the project? If we run out of money, if we complete only the MOS, shouldn't it be in the town area?

Councilmember Cachola asked for an explanation of the rising cost of the project from \$3.7B to \$5.3B and the fact that the city had only received \$246M in 20 months.

\$246M is about \$60M short of what is necessary to stay on track to reach the original \$3.7B estimate, and is woefully short of the \$5.3B "2008 cost of expenditure" estimate.

Director Yoshioka says that \$5.3B is today's dollars, insists that they have a good fiscal plan and he talks about the cyclical nature of the economy.

Please, help me understand:

1. The estimate for the project has gone up \$1.6B (from \$3.7B to \$5.3B) since 2006.
2. Is \$5.3B the expected final cost in 2020, or what will it go up to ???????
3. We are in an economic slump which is projected to last several years and revenues are declining.
4. Currently, we are already short of the expected funds and it will get even worse.
5. Is it expected that the half% GET is going to pick up to a point where it makes up for the current shortage and the expected shortage?
6. Is it expected that the half% GET will increase to a point where it will cover the expected rise in project cost "2020 cost of expenditure"?
7. The state is facing a budget shortfall and there is now, a looming threat for the state to withhold the half% GET for at least a year.

Will any of the above facts affect the City's ability to complete the entire rail project within budget?

If the answer is yes, then we deserve to at least have an MOS that is complete, useable, generating revenue and ready to expand to Waikiki and UH Manoa.

Thank you,

Ted Kanemori
46-066 Heeia St
Kaneohe, HI 96744
Ph: 247-3993
E-mail: ted@tk-serve.com

Reply Requested :

Yes

Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 444 DETAILS

Status : Initial Action Needed
Creation Date : 1/25/2009
Creator Affiliation :
First Name : Melissa
Last Name : Goo
Business/Organization : Moanalua High School: School Community Council
Address : 2894 Ala Ilima Street
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96818
Email : melissa_goo@notes.k12.hi.us
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 01/25/2009

Submission Content/Notes : COMMENTS OF MELISSA GOO
REPRESENTING THE MOANALUA HIGH SCHOOL
SCHOOL COMMUNITY COUNCIL
ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE HONOLULU RAIL TRANSIT PROJECT
January 13, 2008

Thank you for the opportunity to submit comments on the Draft Environmental Impact Statement (DEIS) for the Honolulu Rail Transit Project.

My name is Melissa Goo. I chair and am speaking on behalf of the Moanalua High School (MoHS) School Community Council (SCC). MoHS is located in the Salt Lake neighborhood of urban Honolulu at 2825 Ala Ilima Street, Honolulu, HI 96818. The school was established in 1972 and serves approximately 2,000 students in grades 9 through 12.

The MoHS SCC was established pursuant to Act 51, Session Laws of the State of Hawaii 2004, also known as the Reinventing Education Act of 2004. The MoHS SCC enables Moanalua High School administrators, teachers, parents, students and representatives of the surrounding neighborhood to participate in the decision-making processes of the school. It is comprised of individuals elected by their peers to represent the school community in the interest of improving student achievement. The roles and responsibilities of the SCC include defining the school's vision and mission, reviewing and evaluating the school's Academic and Financial Plans (AFP), requesting waivers as appropriate from policies of the Hawaii State Board of Education (BOE) and Department of Education (DOE), participating in the selection and evaluation of principals, and playing a role in the development and revision of school policies. Finally, the SCC reports to the community and gathers feedback at forums held twice during the school year.

With respect to the DEIS for the transit project, the SCC has identified several benefits to the Moanalua High School community of building the transit system along the proposed Salt Lake Boulevard alignment. In conjunction with its responsibility to report to the community, the SCC is communicating these benefits to the Department of Transportation Services for potential inclusion in the final Environmental Impact Statement. The benefits are as follows:

- Students with geographic exemptions, who comprise approximately 20% of the student body, could ride transit to school and back home each day.
- Teachers and administrators who reside close to a transit station could ride transit back and forth to work each day.
- Transit could provide a cost-effective means of transporting students on field trips to locations of educational interest, e.g. museums and historical sites downtown.
- Students qualified to take college-level courses could use transit to travel to Leeward Community College, Honolulu Community College, Hawaii Pacific University, UH West Oahu, and eventually UH Manoa.

Reply Requested : Thank you again for the opportunity to comment.
Submission Type : Yes
FOIA (Freedom of Information Request) Request : Draft EIS Comment
FOIA Referral Date :
FOIA Response Date :

RECORD # 449 DETAILS

Status : Initial Action Needed
Creation Date : 1/26/2009
Creator Affiliation :
First Name : Gerald
Last Name : Sakamura
Business/Organization : resident
Address : 99-844 Hulumanu St.
Alternative Preference :
Apt./Suite No. :
City : Aiea
State : HI
Zip Code : 96701
Email : sakinancy@hawaii.rr.com
Telephone : 488-9569
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 01/26/2009
Submission Content/Notes : I think that the most benefit we can achieve would be to start from downtown out to the Airport and beyond Pearlridge and UH west. If there comes a time where cost might stop or long delay the project, we could use whatever is made and start service from wherever the project is stalled. It would be the optimum way to gain usage of whatever is already made, whatever the delayed portion would be. And at the same time, be an example of what the completion would be like. Thank you for the opportunity to input my opinion.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 450 DETAILS

Status : Initial Action Needed
Creation Date : 1/26/2009
Creator Affiliation :
First Name : David
Last Name : Kammerer
Business/Organization :
Address : 55-044 Kam Hwy
Alternative Preference :
Apt./Suite No. :
City : Laie
State : HI
Zip Code : 96762
Email : kammered@byuh.edu
Telephone : 293-0300
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 01/26/2009
Submission Content/Notes : I still wish there were a way to convince you that, although Oahu's political power brokers obviously see this light rail as an economy-boosting public works project, somebody's got to foot the bill. I am absolutely convinced that the unintended consequences of this project will be to place a backbreaking strain on Hawaii's taxpayers that will hurt the county's economy in many ways both short- and long-term--a net negative for this island's residents for at least fifty years. I guess your children and my children will find out which of us was right.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 451 DETAILS

Status : Initial Action Needed
Creation Date : 1/26/2009
Creator Affiliation :
First Name : Robert
Last Name : Airhart
Business/Organization :
Address : 46-074 Puulena St
Alternative Preference :
Apt./Suite No. : 1115
City : Kaneohe
State : HI
Zip Code : 96744
Email : airhartbn@hawaiiantel.net
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 01/26/2009
Submission Content/Notes : Will the train and road bed be maintained the same as our roads have NOT BEEN in the past?? Scary
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :



SCHULER DIVISION

January 19, 2009

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

Dear Mr. Yoshioka:

Subject: Comments on the Draft Environmental Impact Statement (DEIS) for the Honolulu High Capacity Transit Corridor Project

Thank you for allowing us the opportunity to provide comments on the subject DEIS. As you are aware, we are the developers of the master planned Ho’opili project in East Kapolei, and have been and will continue to be a strong supporter of this project. The transportation infrastructure is reaching its limits in being able to move people efficiently through the West Oahu to East Honolulu corridor. The proposed project will increase the infrastructure capacity in the long-term and provide transportation alternatives to residents along this corridor. It will also be able to support the planned growth in the West Oahu region.

We have reviewed the document and provide the following comments.

Chapter 2, Alternatives Considered:

Page 2-14—the section dealing with Transit Centers stated that Transit centers would be constructed as stand-alone facilities or as part of park and ride lots at:

UH West Oahu
 West Loch
 Pearl Highlands
 Aloha Stadium

The following is a listing of each of the stations, the stations types and if a park and ride or transit center is being proposed at the station.

Station	Station Type	Park and Ride	Transit Center
East Kapolei Station	Elevated Platform and Connecting Bridge	12 Acres for 900 Spaces	No
University of Hawaii, West Oahu	Elevated Platform and Concourse	(2)-5 Acre Sites for 500 Spaces each (Total 1,000 Spaces)	Yes (Page 2-14, but not identified on Figure 2-15)
Ho’opili Station	Elevated Platform	No	No
West Loch Station	Elevated Platform and	No	Yes (Page 2-14)

	Concourse		
Waipahu Transit Center Station	Elevated Platform and Concourse	No	Not mentioned on Page 2-14, Mentioned in Figure 2-18 but not located on map
Leeward Community College Station	Platform	No	No
Pearl Highlands Station	Elevated Platform and Connecting Bridge	11 Acres for 1,600 Spaces	Yes (Page 2-14, but not identified on Figure 2-20)
Pearlridge Station	Elevated Platform and Concourse	No	No
Aloha Stadium Station	Elevated Platform and Concourse	7 Acres for 700 Spaces	Yes (Page 2-14, but not identified on Figure 2-22)
Ala Liliko'I Station	Elevated Platform and Concourse	No	No
Aloha Stadium Station	Elevated Platform and Concourse	7 Acres for 700 Spaces	Yes (Page 2-14, but not identified on Figure 2-24)
Arizona Memorial Station	Elevated Platform and Concourse	No	No
Pearl Harbor Naval Base Station	Elevated Platform and Concourse	No	No
Honolulu International Airport Station	Elevated Platform and Concourse	No	No
Lagoon Drive Station	Elevated Platform	No	No
Middle Street Transit Center Station	Elevated Platform and Concourse	No	Not mentioned on Page 2-14, Mentioned in Figure 2-29 but not located on map
Kalihi Station	Elevated Platform	No	No
Kapalama Station	Elevated Platform	No	No
Iwilei Station	Elevated Platform	No	No
Chinatown Station	Elevated Platform and Concourse	No	No
Downtown Station	Elevated Platform and Concourse	No	No
Civic Center Station	Elevated Platform	No	No
Kakaako Station	Elevated Platform	No	No
Ala Moana Station	Elevated Platform	No	No

From the information provided:

1. Is the City limited to the specific type of station listed in this chapter or could any one of the three proposed configurations be used (i.e. Side platforms without mezzanine, Side platforms with mezzanine, or Center platform with mezzanine)?
2. Does mezzanine mean concourse as is used in identifying the specific stations in the figures?
3. Is there some criteria for the proposed "Transit Centers" and some idea of the area (acres) required for each of these centers?
4. There seems to be more Transit Centers being proposed than what is listed on page 2-14.

On page 2-24, the key components of each transit station are described in a "sidebar." We note that there is no mention of public restrooms (even automated public toilets) or what form of security will be provided (including security cameras).

Page 2-36 Park and Ride Lots—are the park and ride lots limited to the locations identified in the DEIS or is there some flexibility to house the required number of spaces in and around the transit stations by incorporating more parking into redevelopment or development adjacent to the station. For example, if an entertainment facility were being built near the station, the parking for the entertainment center could be shared and used for the park and ride since the need for parking for the transit should be at different times when the parking would be needed for the entertainment facilities. Allowing these types of joint uses and incorporating the park and ride needs into the development would seem to be mutually beneficial to both the City and the developers.

Pages 2-37 and 2-38 Vehicle Maintenance and Storage Facility—This section identifies a 41 acre area adjacent to the existing HECO Substation at Ho’opili and another 43 acre site near the Leeward Community College (Navy Drum Site) as possible sites for the maintenance facility.

This 41 acre site is also indentified on the Conceptual Alignment Plans and Profiles (Drawing No.: RP004a). However, on the Conceptual Right-of-Way Plans (Drawing No.: RW006a) the proposed Maintenance and Storage Facility is identified as a 12 acre site. Please clarify the actual land requirements for this facility.

Also, while the statement in the document is correct that the site is currently in agricultural use, the existing lessee, Aloun Farms, has a lease from us for its entire processing and office facilities located within the footprint of the proposed vehicle maintenance facility. The processing facility lease expires in 2017. The Aloun Farms facilities house all of their administrative support staff and process all of the produce grown on the property as well as other properties they have under lease elsewhere. Given the need for the Transit Vehicle Maintenance facility at some time when the initial segments of the transit system are being constructed (Page 2-39), early notification on a decision of which site will be selected would provide our tenant with as much time as possible to plan for a transition.

While an alternative Vehicle Maintenance and Storage Facility is shown adjacent to the existing HECO Substation at Ho’opili, we are concerned that the DEIS did not fully discuss the visual and noise impacts from 24-hour day operations on surrounding uses within the proposed Ho’opili project. Also not described, is the visual and land use impacts from the “Elevated Access Tracks” that would connect to the Fixed Guide-way on the proposed Ho’opili project.

In addition, the proposed transit maintenance facility located northeast of and adjoining to the HECO Ewa Nui Substation, as depicted in DEIS Figure 2-41, as well as Figure RP004a (Sheet 5) of Appendix A (Conceptual Alignment Plans and Profiles), would appear to preclude the planned development of an east-west internal Ho’opili roadway connection mauka of Farrington Highway to link the mauka Project lands to the east and west of the transit facility. The transit facility would appear to prevent the linkage of 1st Avenue and 2nd Avenue. This would require traffic between the mauka east and west Project areas to circulate on Farrington Highway to travel between the two areas, thus placing additional traffic volumes along Farrington Highway and increasing traffic volumes at the Farrington Highway intersections providing mauka area access to Project mauka area.

If the maintenance facility site in Ho’opili is selected, it would be desirable to locate the transit yard further east or west, or reconfigure the transit facility, to allow a corridor for roadway connection between the east and west sections of the Ho’opili area mauka of Farrington Highway. Another possibility would be to make a portion of the access/perimeter transit facility roadway a public roadway.

Page 2-38 Traction Power Substations—The project will require traction power substations approximately every mile. Are these substations planned to be located in the existing transit right-of-way below the elevated tracks or will a stand-alone site be required? Would the space requirements be limited to each site being 640 square feet (40 x 16) or will the actual footprint required be larger?

On page 3-53, in the “sidebar” entitled “Summary of Findings: Transportation Conditions and Effects”, we note that under the category of “Effects of the Build Alternatives”, there is no mention of the traffic impacts from cars generated from the “Proposed Park-and-Ride Lots” on streets immediately surrounding such facilities.

Table 4-1, Page 4-4, “Land Use (Section 4.1) – land acquired for transportation use” - While we would concur that approximately 88 acres of prime and statewide-important farmlands would be affected, the land in East Kapolei has long been planned as part of the Second City of Oahu. This is discussed on page 4-20 but not included in the summary of impacts on page 4-4. The implementation of the HHCTC project has long-term effects on the pattern of land use on Oahu. It will positively enhance and reinforce the linear pattern of development, reducing the pressure for development of agricultural lands in Central Oahu and rural areas elsewhere on the island. This is not discussed on page 4-20.

Table 4-1, Page 4-4, “Economic Activity (Section 4.2) – property tax revenue” - While we would concur that property acquired from private owners and converted to a transportation use would result in a direct reduction in property tax revenues, at least initially, over the long-term, with resulting higher-density transit-oriented development around transit stations, there will probably be a long-term net gain in property tax revenues, off-setting the initial loss in property tax revenues. This is discussed as an impact or possible outcome on pages 4-24 (also pages 4-166 and 4-167) but not included in the summary of impacts on page 4-4.

Table 4-1, Page 4-5, “Acquisitions, Displacements, and Relocations (Section 4.3)” - The land under the selected Vehicle Maintenance and Storage Facility site would eliminate either landowner’s opportunities for development of their respective sites. In the case of the Ho’opili project, the impacts of the use of the site will not be limited to the loss of property, but a Vehicle Maintenance and Storage Facility at Ho’opili could have major visual and noise impacts on the surrounding land uses within the proposed Ho’opili project. As previously noted, the DEIS did not fully discuss the visual and noise impacts from 24-hour day operation of the Vehicle Maintenance and Storage Facility on surrounding uses within the proposed Ho’opili project. Also not described, is the visual and land use impacts from the “Elevated Access Tracks” that would connect to the Fixed Guide-way on the proposed Ho’opili project.

Page 4-10, Section 4.1.2 Affected Environment—This section includes the following three categories of Farmland:

1. Prime Farmland
2. Unique Farmland
3. Farmland of statewide importance

No reference is provided as to the sources for these categories. There have been a few studies such as the Land Evaluation and Site Assessment (LESA) system and the Agricultural Lands of Importance to the State of Hawaii (ALISH) system done over time with different rating and category systems for agricultural lands. Also, recently the Legislature enacted new laws on

designating Important Agricultural Lands (IAL). To minimize confusion, it may be appropriate to either reference the three categories listed with the three other efforts or reference one or all of the three existing sources to identify agricultural lands in Hawaii.

Page 4-28, Figure 4-9 – While Figure 4-3 indicates the “Future Campus of UH West Oahu” and the “Future Salvation Army Kroc Center”, Figure 4-9 does not indicate these important community resources and facilities, even though they are currently not in operation (but will be by the time the transit stations are built).

Pages 4-57 to 4-93 – Much emphasis was made on discussing the impacts of the elevated fixed guide-way from surrounding areas, however there did not appear to be any analysis of the visual impacts from the Vehicle Maintenance and Storage Facility, at either of the proposed locations. As previously noted, the DEIS did not appear to discuss the visual impacts from 24-hour day operation of the Vehicle Maintenance and Storage Facility on surrounding uses within the proposed Ho’opili project, including outdoor lighting pollution (assuming outdoor storage and maintenance). Also not described are the visual impacts from the “Elevated Access Tracks” that would connect to the Fixed Guide-way on the proposed Ho’opili project.

Page 4-103, Figure 4-39 – There is no mention of the noise impacts of the Vehicle Maintenance and Storage Facility on the proposed Ho’opili project. Also the noise impacts from the East Kapolei, UH West Oahu and Ho’opili transit stations are also not shown. We can assist by providing anticipated ambient noise levels at the Hoopili transit station site.

Page 4-171, Table 4-36 – There is no mention of DHHL’s East Kapolei 1 (between UH West Oahu, North-South Road, Kapolei Parkway and Kapolei Golf Course) and East Kapolei 2 (between Ho’opili, North-South Road and Ewa Villages) projects.

We appreciate the opportunity to provide comments on the Draft EIS. Should you have any questions regarding this matter please feel free to contact us directly at 521.5661.

Sincerely,



Dean Uchida, Vice President


SCHULER DIVISION

January 22, 2009

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

Dear Mr. Yoshioka:

Subject: Comments on the Draft Environmental Impact Statement (DEIS) for the Honolulu High Capacity Transit Corridor Project

These comments are being provided as an addendum to our comments of January 19, 2009.

Page 3-4, Tables 3-1 and 3-2 indicate that 6% of the 2,790,000 daily trips by residents use transit, and 5% of the 364,400 daily trips by visitors use transit in 2007. Thus, approximately 5.8% of the total daily resident and visitor trips use transit.

Page 3-23, Table 3-13 shows the no build alternative and the Airport-Salt Lake Alternative

	2007	2007	No Build	No Build	Airport-Salt Lake	Airport-Salt Lake
Resident Transit	165,900	6%	205,700	6%	248,200	7%
Resident Total	2,790,000		3,452,700		3,452,500	
Visitor Transit	17,600	5%	19,800	5%	23,700	6%
Visitor Total	364,400		430,700		431,400	
Total Transit	183,500	5.8%	225,500	5.8%	271,900	7%
Total Trips	3,154,400		3,883,400		3,883,900	

Page 3-36, Table 3-19 Estimated Transit User Benefits Resulting from 2030 Build Alternatives

It appears that the table extracted information from the Oahu OMPO Travel Demand Forecast Model.

Page 4-23, Section 4.2 Economic Activity. This section identifies the PUC as the primary location for non-agricultural jobs on Oahu (approximately 74%). The study reviewed trends and forecasts from the three development and sustainable plan areas in the study corridor (PUC, Ewa and Central Oahu). The job growth for the corridor was projected at 1 percent per year from 2000 to 2030.

Employment Forecast	2000	2030	Annual Growth Rate
Oahu	501,100	630,700	0.8%
Study Corridor	399,300	524,200	0.9%

We understand that the OMPO model makes certain assumptions regarding the jobs being generated in the Ewa-Kapolei Region. With the anticipated build out of the UHWO Campus, the Kroc Center and De Bartolo project on DHHL lands, and the anticipated development-redevelopment opportunities being created by the "Transit Oriented Development" (TOD) around the proposed transit stations, we would expect that the job generation numbers outside of the Primary Urban Center (PUC) would increase significantly and thus have some impact on the resident daily trips.

We believe that some analysis should be done to assess not only the reduction in vehicle trips for residents with the transit project but also the compounded impact of reduced vehicle trips due to quality jobs being created or relocated out of the PUC.

We appreciate the opportunity to provide comments on the Draft EIS. Should you have any questions regarding this matter please feel free to contact us directly at 521.5661.

Sincerely,

A handwritten signature in black ink, appearing to read "Dean Uchida".

Dean Uchida, Vice President

From: BakiProp@aol.com [mailto:BakiProp@aol.com]
Sent: Thursday, December 11, 2008 12:43 AM
To: Matley, Ted <FTA>
Subject: No Subject

Sir

State of Honolulu, is taxing us right and left Double taxing. Higher taxes, killing small businesses. Tourism is dried up. Waikiki beaches, Hotels are empty. Where will we get the Money to pay for this elephant called the Rail Transit? It will die a thousand death not it will take 15 years to built it. Just like the Boston Beautification.

Not now. Please.

Robert Thomas

Make your life easier with all your friends, email, and favorite sites in one place. Try it now.
(<http://www.aol.com/?optin=new-dp&icid=aolcom40vanity&ncid=emlcntaolcom00000010>)

1/23/2009

From: BPear26848@aol.com [mailto:BPear26848@aol.com]
Sent: Thursday, December 18, 2008 10:51 AM
To: Matley, Ted <FTA>
Cc: governoringle@hawaii.gov
Subject: Rail project

Just another voice raised in protest against this fiscally irresponsible project, not to mention the untold misery it will cause to the people along the route and the urban blight.

**Bryan Pearson
Kane'ohe, HI.**

One site keeps you connected to all your email: AOL Mail, Gmail, and Yahoo Mail. [Try it now.](#)

1/23/2009

From: Nicholas C. Bleecker [mailto:ncbleecker@earthlink.net]
Sent: Saturday, December 27, 2008 12:29 PM
To: Matley, Ted <FTA>
Subject: Proposed Honolulu Rail Project

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

Dear Sir,

These comments are in regard to the DEIS for the proposed elevated fixed rail system for Kapolei to Honolulu.

The original justification made for a fixed rail system was that it would "solve" our problems of traffic congestion that occur on H1 principally during the morning and afternoon commute times. When it was reported that this plan would do very little for traffic, the justification given to the public for why it was "needed" was changed to allege our need for an "alternative" to driving or using the bus system. Later, during the campaign to push the project to voters, the "need" for the the public to support the project was centered around its supposed beneficial "boost" to our local economy. When funds come into our local economy from outside then a "multiplier effect" might provide a modest boost to our economy. In this case, the overwhelming majority of funding comes from the pockets of local residents. There is no boost except to the few citizens who will feed from the public trough. The promotional campaign launched prior to the November referendum was heavily financed by both the unions and taxpayer money under the guise of an "information" program from the Mayor's office. Many citizens who do not support the project are upset at the blatant way in which the City Administration: 1. did everything it could to prevent the Stop Rail Initiative from even getting on the ballot, 2. spent taxpayer funds to clearly promote the project with misleading and incomplete information about it under the guise of an "informational campaign", and 3. suppressed the negative facts contained in the DEIS until two days before what turned out to be a very close election. The voters were hoodwinked about the supposed benefits of this project through a very deceptive yet slick advertising blitz.

Among the new facts that came out in the final hours before voters were able to cast their vote on the project included the increased price tag for rail. The public had been fed a steady diet of propaganda that always used a much lower figure (if \$3.7 billion can be considered "low"). The City has been successful in dismissing concerns about the costs for this project that will fall upon Honolulu's residents. The increase in the excise tax is seen as mostly invisible by most people even though it represents the largest transit tax imposed on individuals of any state and is also one of the most regressive methods of raising tax money, causing more distress upon lower incomes (if "invisibly"). The cost of living here has become even higher than it already was. It will become higher yet because of this project and because of the perpetual operating subsidy it will require.

These cost figures for the rail project are just estimates, of course. They significantly lag behind current realities. To the

1/23/2009

degree that economic conditions are volatile the figures will be unreliable. Add to that the fact that the figures are prepared and cleared by the same self serving entities that may profit in one way or another due to the incestuous relationships of consultants, contractors and public figures involved. Finally there is the undeniable fact that no large public project in Hawaii has ever come in even remotely close to budget . An extra billion here. An extra billion there. Pretty soon it starts to add up to big money.

And how's that tax collection going? Not too well. World events transpired to reduce the take of this "invisible", and therefore seemingly painless, tax. Revenues are not keeping up will projections. Read the national news. It will get worse. And Hawaii's economy is not immune to the coming deep and prolonged recession. Residents here will suffer along with the rest of the world. Does this seem like a good time to burden us with the exorbitant costs of the most expensive rail transit project, per resident or per mile in the country? One that accomplishes so little?

Who would think so? Well, of course the giant mainland contractors who would profit from us to build it, of course. They have spent considerable money themselves to promote the project and to contribute generously to politicians who also support it. Those politicians thus have a personal interest in pushing the project for the benefit to their campaign coffers and to gain influence with the powerful unions who have a notoriously short sighted view of what is good for Hawaii. Basically, the unions use all their significant clout to support any large project that would funnel jobs to their members regardless of its merits or cost to taxpayers. The construction unions spent heavily before the election to influence the voters to approve the project. The big money spent to inundate the public with slick ads in the newspapers and relentless radio and television advertising for rail by the City and these others succeeded in deceiving just enough voters for a narrow victory to proceed with the project. Because of the understated costs and decreased revenues the need for additional tax increases and/or property tax increases in the future to prop up this project is obvious, and yet neither the City Administration nor the City Council has been forthcoming about this inevitability.

Beyond the cost or our ability to pay, this rail project is a very bad idea. As noted above, it will offer little relief to drivers on Oahu. Relatively few citizens use the existing bus mass transit system today. It is speculative to assume vastly more will use this new system that relies on feeder buses and is so limited in whom it would serve and where it would go. The predictions of time saved by the average commuter using rail over what could be achieved with express buses in dedicated lanes on H1 are negligible. The differences in costs of the two systems are huge. Further, once we have committed public resources to pursue rail, all other potential solutions will be foreclosed and future advances in technologies removed from consideration for Oahu. We will be stuck with a completely rigid and antiquated system for a very, very long time.

The alternatives to rail were never seriously considered. The fix was in for steel on steel fixed rail from the beginning. For example, the proposal for dedicated lanes for buses that was considered involved the taking of an existing lane away from drivers on the H1 and so was rejected as causing more congestion. They never reviewed a plan for dedicated lanes built separately and in addition to existing lanes. Cost of a separated HOV lane were inflated by assuming it needed to be elevated for the entire twenty miles to Kapolei and not considering an express bus system employing a much shorter elevated section that would simply go around or over highway bottlenecks. Other potential improvements to express bus systems were summarily dismissed, as were ideas involving strategic bypasses around the two major choke points on the H1. Major improvements to the H1 are sorely needed, and are not impossible, but would be under the purview of the State, not the City. Improvements to highways and an improved express bus system could serve the interests of the entire island, not just a tiny sliver of the population that might actually use the rail to Kapolei.

Elevated rail will be hideous, cutting through town near the waterfront and dissecting mauka / makai view planes, and noisy, with trains screaming by every three minutes night and day. This will be bad for tourism. When visitors see that Honolulu looks and sounds just like other mainland cities that are much, much larger they will see Honolulu as an urban environment, not a tropical one. They will travel to other destinations in the Pacific. Our economy will further suffer. This is why the Waikiki Improvement Association is opposed to elevated rail being run into Waikiki.

So the benefits for Honolulu of rail are skimpy and overstated and its downside is huge. Why is it being so doggedly pushed? Because it is basically nothing more than a development scheme. It is not about mass transit. It is all about the building of TODs out in what are now empty cane fields along the route. The City is preparing to give developers lucrative tax breaks and zoning exemptions to lure development. It is viewed as an opportunity for creating density where none exists by the entities listed above. It is interesting to note that one of the stations listed in the plan will stop in an empty field because the proposed development there has been withdrawn due to the current economic situation.

Starting the line out at Kapolei and building it in towards town is ludicrous. In twenty years people in Kapolei may possibly be able to ride it as far as Wahiawa? How is that going to help commuters or traffic conditions on the H1? Relief is needed by residents for traffic conditions near Honolulu. This project does little to alleviate traffic on the H1. Its truly outrageous cost is not justified by its sparse benefits to the island's residents. The elevated fixed rail being proposed for this beautiful city is not what we need or can afford. More imaginative solutions are called for, solutions centered around mass transit, not development of TODs. The plan, as it is now, is saturated with inefficiencies and has the very real possibility of being disastrous for Honolulu's citizens and the city itself.

1/23/2009

-----Original Message-----

From: Sally Hall [mailto:HALLS011@HAWAII.RR.COM]
Sent: Tuesday, December 23, 2008 7:54 PM
To: wyoshioka@honolulu.gov
Cc: Matley, Ted <FTA>; governor.lingle@hawaii.gov
Subject: Rail

Government by the People, for the
People?

"Our government should work for us, not against us, help us, not hurt us." These words spoken by Barack Obama at the Democratic National Convention ring with truth. Unfortunately, though, in Honolulu they do not reflect the reality of city government. Our city officials, under the leadership of Mayor Mufi Hannemann, are refusing to stop a train that will carry us head on into economic and environmental disaster.

Trade unions and businesses which stand to benefit from the steel on steel rail support it, as do many city bureaucrats dependent on Mufi for their jobs. But there are 35,000 or 45,000 or 49,000 voters, depending on how one defines voter, who want alternatives. Their concerns should not be dismissed. Only after a protracted struggle by citizen groups did the city agree to a City and County of Honolulu question on the November 4th ballot asking, "Should the city build a steel wheel on steel rail transit system?" Nearly half of the citizens of Hawaii fully understood the dire consequences of such a system, and voted "No!"

The proposed steel on steel rail will be an elevated 20 to 40 foot high cement structure climbing to 70 feet at U.H. Manoa and 125 feet at Ala Moana Center, stretching from Kapolei to Ala Moana and U.H. Manoa with spurs to the airport and along the Ala Wai. On Nimitz Avenue between Ka'ai Street, Bishop Street, and Halekauwila, the 20 foot elevation will run along the water. Stations will be strategically placed at 32 sites, one 5 stories high across from Aloha Tower and one 12 stories tall at Ala Moana Center. No one along this route will be able to escape the racket of steel on steel trains roaring by. No one will be able to escape the blight on the aina.

The costs to the taxpayer are staggering. Some states have no sales tax; others have no property tax; some have no tax on food or medications; still other states have no income tax. But in Hawaii we have them all, except in place of a sales tax we have a more insidious tax, a 4% excise tax, a tax on business transactions at every level which is passed on to the consumer. Hannemann added a "county

surchARGE" of .5% to the excise tax to help finance the rail, giving us a rate of 4.5%. If businesses choose to pass on their excise tax liability to the consumer, this tax can be as high as 4.712%.

Add this to our high cost of living, and the financial burden becomes untenable. The cost of the steel on steel rail, with inflation and cost overruns, is now projected to be about 7 billion dollars. With the burden of maintaining a corrosion prone steel on steel system, an impractical choice for an island surrounded by ocean, the costs go even higher. We will pay, our children will pay, and our grandchildren will pay for a system that with rapidly advancing technology will become obsolete as fast as it is built.

By not presenting alternatives to steel on steel rail technology, the mayor leads many voters to think the choice is rail or nothing. Yet there are alternatives to steel on steel rail, well integrated and carefully thought out systems that would ease the traffic nightmare at a fraction of the cost and environmental destruction. The coordination of ferries, high occupancy toll lanes, fleets of mini buses, traffic lights, contra flow lanes, bicycle routes, and the use of new underpasses while encouraging telecommunication and staggered work hours would be less invasive, less costly, and more flexible than a steel on steel rail system. There may even be another less invasive, less costly, and more flexible rapid transit system that would work for Oahu commuters.

Honolulu needs a mayor who works for all the people, not just those who contribute to his campaign or who will profit from the steel on steel rail system. An honest reappraisal of the rail issue would help citizens feel their government is working for them. An honest and effective mayor would look at the current economic recession and have the integrity to scrap a rail system that will bankrupt the future, become obsolete before it is finished, and wreak havoc on Oahu's fragile ecosystem.

From: Suzanne Teller [mailto:suzantell@earthlink.net]
Sent: Monday, December 29, 2008 4:49 PM
To: Matley, Ted <FTA>
Subject: Honolulu City Rail Proposal

Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
Honolulu Hale, 3rd Floor
Honolulu, HI 96813

Dear Wayne Yoshioka:

Thank you for taking time to read this taxpayer's view of the City's rail proposal.

As you know, this heavy rail project is the most controversial project ever undertaken in Honolulu since Hawaii became a State. And when a project is so controversial and costly (inspite of a maneuvered vote of approval) it will be plagued by unalterable problems and cost overruns FOREVER.

This Island is a fragile eco-system that should not be completely covered over in cement or it will die. The heavy rail system is designed

1/23/2009

to do just that. Each mile of it will lead an unending plethora of cement structures from one end of the route to the other. This is not right for people, land, animals, flora and fauna, or LIFE ITSELF ON THIS ISLAND.

A light rail system would suffice and not be as obtrusive, controversial, costly or destructive. Please do not bail out the unions at the expense of our fragile eco-system. Fifty years of living here tells me heavy rail is not right at all.

UA MAU KE EA O KA 'AINA I KA PONO. (The life of the land is preserved in righteousness.)

Very truly yours,

Suzanne Teller
(Mrs. Albert Teller)

Mrs. Albert Teller
1541 Kalakaua Ave. #1510
Honolulu, HI 96826

1/23/2009

From: Gerhard C. Hamm [mailto:gch.hawaii@hawaiiantel.net]
Sent: Wednesday, January 07, 2009 2:36 PM
To: Matley, Ted <FTA>
Subject: Honolulu Rail System

January 6, 2009

Dear Mr. Matley,

Phoenix just opened a new 20 mile light-rail train built for \$1.4 billion.

Why does our Honolulu government project \$5.3 billion for our 20 mile system? Are the Phoenicians that much smarter than us to elect a government that provides them with the same length system for almost \$4 billion (Four Billion Dollars) less? Wow!

What could we taxpayers do with \$4 billion in our own pockets? Think about it, seriously. Perhaps for the billion-dollar EPA-required sewage upgrade, and still have a few billions left?

Sincerely,
Gerhard C. Hamm
1930 Alaweo St.
Honolulu HI 96821-1304
(808) 373-1930
GCH.Hawaii@Hawaiiantel.net

1/23/2009

0241 R712/08-293446

12/29/08

TO: Dept of TRANS.
650 So. King St - 96813

FR: Beatrice Tomihama
SUBJ: RAIL Project

1. I'm completely AGAINST The RAIL Project.
2. You're SPENDING A TERRIFIC amount to this project
3. NOT MANY will RIDE the RAIL. Even the BUS today very few ride it.
4. When I'm going town I see so many BUS "NOT IN SERVICE" - So who's going to RIDE the RAIL?

Beatrice Tomihama

T Ms. Beatrice Tomihama
95-1059 Bula St
Mililani, HI 96789-3722

R712/08-293447

December 29, 2008

Robert Fowler
750 Amana Street #801
Honolulu, HI 96814

Dept of Transportation
650 S. King St. 3rd Fl
Honolulu, HI 96813

To Whom It May Concern:

I am concerned about your ambitious timetable regarding the rail transit system. I believe you should conduct a more in depth study on alternate transit such as elevated toll highway lanes and a more expansive bus system. I am also concerned about burial grounds, historical sites and the loss of pristine views of this island that is too small for a fixed rail system. You have done studies in other counties on their rail systems but it doesn't compare with Honolulu because of our size, were just too small. The future of this island is to move toward a green economy like electric cars because once the rail is built it will continue to draw power and require unwanted maintenance and when the power goes out so does the rail. It seems that Mayor Mufi Hannemann is trying to push this project through before he leaves office and isn't telling us everything about the ultimate costs, so slow down before you jump to the wrong conclusions.

Copy to: Charles Djou

Respectfully,



AR00057423

Honolulu High-Capacity Transit Corridor Project

Welcome to the Honolulu High-Capacity Transit Corridor Project's Public Hearing for the Draft Environmental Impact Statement/Section 4(f) Evaluation.

This public meeting and hearing has been designed to inform the public about the transit project, explain materials contained in the Draft EIS, answer questions from the public, and collect public input on project issues related to the Draft EIS, Section 106 of the National Historic Preservation Act, Section 4(f) of the U.S. Department of Transportation Act, and floodplains affected by the project.

Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulutransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulutransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: JOANNA BOYETTE Address: 4336 LAAKEA STREET
 Phone: (808) 221-4474 Honolulu, Hawaii
 E-mail: _____ 96818

Comment(s):
 I live on Laakea Street in Foster Village. This street is parallel to Salt Lake Boulevard and directly across from Radford High School. I have lived in the same house on Laakea Street since my parents moved here in 1967 when I entered the fourth grade. At that time nothing was in-between Foster Village and the Aiea Shopping Center but a rough road and a few run down houses. Since then we have been surrounded by Makalapa Elementary School, the Stadium Marketplace, Stadium Mall, Halawa Valley Estates, Alii Plantation, the Aloha Stadium, Crosspointe subdivision, and CONSTANT noise from both the H-1 Freeway and Kamehameha Highway. From the front of my house looking toward Salt Lake Boulevard and Radford High School I can count 23 telephone and electricity wires strung across my view. I absolutely do not want the proposed rail to be anywhere near Salt Lake Boulevard. I do not live close enough to either of the proposed stations along Salt Lake Boulevard for it to be advantageous to me. It would still be faster to hop in my car and get to down town within 15 to 20 minutes. I do not want to hear constant rail traffic from 4 am to 12 pm each and every day. I do not want my property value to go down and other taxes to go up because of the rail. I do not want to exit my house and see the rail structure almost in my front yard; I would rather see all of the phone and power lines. I have learned to ignore them but could never learn to ignore that massive rail system looming above my neighbor's houses and blocking what portion of the mountains I can still see. I do not look forward to having Salt Lake Boulevard torn up again and ruined forever by the rail structure running down the whole length of it. I say NO to the Salt Lake Boulevard route and YES to the Airport/Nimitz route.

DTS
 RAPID TRANSIT
 DEC 31
 NO 47



**DEPARTMENT OF BUSINESS,
ECONOMIC DEVELOPMENT & TOURISM**

LINDA LINGLE
GOVERNOR
THEODORE E. LIU
DIRECTOR
MARK K. ANDERSON
DEPUTY DIRECTOR
ABBEY SETH MAYER
DIRECTOR
OFFICE OF PLANNING

OFFICE OF PLANNING

235 South Beretania Street, 6th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

Telephone: (808) 587-2846
Fax: (808) 587-2824

Ref. No. P-12371

December 24, 2008

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

Dear Mr. Yoshioka:

Subject: Honolulu High-Capacity Transit Corridor Project
Draft Environmental Impact Statement (EIS)

Thank you for sending the Office of Planning the Draft EIS for the above referenced project. The action triggering the environmental review is the requested use of federal and State funds and land to implement the project.

The project's purpose is to provide high-capacity rapid transit in the highly congested east-west transportation corridor between Kapolei and the University of Hawaii at Manoa, as specified in the Oahu Regional Transportation Plan 2030 (Oahu Metropolitan Planning Organization 2007).

The Office of Planning recommends that the Final EIS sufficiently cover areas of State concern. The Final EIS should consider the impacts of the proposed project and appropriate mitigation measures covering the following issues:

1. **Agricultural Lands** – Preservation of important agricultural lands is a priority for the State and counties. The Draft EIS has a discussion of the issue in Section 4.1.3 but concludes that the effect would not be significant. These lands are currently in agricultural use and represent a significant percentage of prime agricultural lands on Oahu. Please discuss how the loss of these lands can be justified, how other lands of equal importance on Oahu can be protected, and the impact to the specific farm operations and whether they will be able to relocate.
2. **Cultural/Historic Resources** – The Department of Land and Natural Resources, State Historic Preservation Division (SHPD) reviewed the technical reports prepared for the project and did not have any questions or comments regarding the

Mr. Wayne Y. Yoshioka
Page 2
December 24, 2008

methodology used to determine National Register eligibility. SHPD has reviewed the preliminary determination of effects presented in the Draft EIS but has not completed concurrence on determination of adverse effects. SHPD has raised concerns regarding indirect effects to several resources and the magnitude of the effects to the Chinatown Historic District. The Final EIS should include an inventory survey of cultural and historic sites, with monitoring and preservation plans approved by SHPD.

3. **Coastal Zone Management (CZM)** – The proposed project site is entirely within the State Coastal Zone Management Area. The State oversees protection of natural, cultural, and economic resources within the coastal zone. The project as proposed appears to generally conform to the State CZM objectives and policies.

The Office of Planning looks forward to receiving an updated Final EIS with the potential impacts and mitigation measures for the above issues clarified and addressed. If you have any questions, please call Scott Derrickson, AICP, in the Land Use Division at 587-2805.

Sincerely,



Abbey Seth Mayer
Director

c: Mr. Barry Fukunaga, Office of the Governor
Office of Environmental Quality Control
Mr. Theodore E. Liu, DBEDT
Mr. Chris Baron, DBEDT

RECORD # 467 DETAILS

Status : Initial Action Needed
Creation Date : 1/28/2009
Creator Affiliation :
First Name : kenny
Last Name : smith
Business/Organization :
Address : 3178 t st
Alternative Preference :
Apt./Suite No. :
City : sacramento
State : CA
Zip Code : 95816
Email : kenny2154@att.net
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 01/28/2009
Submission Content/Notes : i just looked at the honolulu advertiser paper did not have much in it about the plan. so what is going on over there? any way. so is the air port route is a go?. see the paper did not say much about it. so what is going on. is the salt lake route on hold?. do get back to me with some answer and you could send me your paper on the rail please. i like it.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 468 DETAILS

Status : Initial Action Needed
Creation Date : 1/28/2009
Creator Affiliation :
First Name : Lance
Last Name : Pazaglia
Business/Organization : None
Address : 445 Seaside Avenue
Alternative Preference :
Apt./Suite No. : 4301
City : Honolulu
State : HI
Zip Code : 96815
Email : lepforunme2@yahoo.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 01/28/2009
Submission Content/Notes : I think your project is a great idea. Don't let the naysayers bring you down on the project. It is the best idea ever for Oahu. Keep me informed for support
Reply Requested : Yes
Submission Type : Comment/Suggestion
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

STEVEN FEKETE
PH 942 1466
430 Keoniana St. Apt 313
Hon. HI 96815

TO THE MAYOR

Phoenix rail lesson

Phoenix just opened a new 20-mile light-rail system, built for \$1.4 billion.

Why does our government project \$5.3 billion for our 20-mile system? Are the Phoenixians that much smarter than us to elect a government that provides them with the same length system for almost \$4 billion less? Wow!

What could we taxpayers do with \$4 billion in our own pockets? Think about it. Perhaps for the billion-dollar required sewage upgrade, to "keep Honolulu from bankruptcy" as Mayor Mufi so ominously declared, and still have a few billion left?

Gerhard C. Hamm
Waialae HI

BUT AGAIN, SOMEONE HAS TO PAY
TO THE REELECTION OF OUR
POLITICIANS !! BUT 4 BILLIONS ??
WELL THAT'S HAWAII.

Rev. & Mrs. Samuel M. Smith and Family
P. O. Box 1015
Kailua, HI 96734-1015
808-230-8683 or cel 351-2753

November 27, 2008

URGENT URGENT URGENT

Mayor Mufi Hannemann
Honolulu Hale
530 S. King St.
Honolulu, HI 96813

Dear Mayor Hannemann:

This is to certify to you that **EMINENT DOMAIN SUITS ARE UNNECESSARY, A MAJOR WASTE OF TIME AND TAXPAYER MONEY.**

I SHALL volunteer to assist every homeowner and business affected by the proposed EMINENT DOMAIN to provide right-of-way for your elevated rail system and to testify in court to STOP plans for such an elevated system.

You know that I have been urging MASS TRANSIT NOW since 1983 and did all I could to help influence voters to vote FOR the steel-on-steel rail system. **Now, I will work TWICE AS HARD to get you, Mayor Mufi, and City Council to reconsider the ONLY LOGICAL AND COMMON SENSE SYSTEM for the 21st Century — 100 % UNDERGROUND steel on steel RAIL.** I will also be bringing pressure to bear from the State Legislature and from Washington. I have already contacted Senator Inouye who, I am sure doubtless voted for funding for the Washington DC UNDERGROUND metro system, and I am urging him to tie Federal funding to UNDERGROUND construction similar to that of the Chunnel. (Please visit

<http://www.affordableworldtravelandtours.com/honolulucommonsensetransit/honolulucommonsensetransit.html>.)

I am told, the State of Hawaii may already have used such equipment as was used in the *Chunnel* in building the H-3 tunnels and may still own it.

In past correspondence, I have already given you well over 20 SOLID, Valid reasons why UNDERGROUND will be less expensive and because only Environmental Impact studies/statements, which would need little modification from your already existing one, and the signing of right-of-way agreements with the State and construction contractors, construction could begin even by the end of this December. If you insist on present elevated routing, Eminent Domain lawsuits and related court injunctions can delay even the signing of contracts for at least many months and possibly several years. This, of course, will cost hundreds of thousands of dollars in additional costs between attorney fees and increased land value, to say nothing of the cost to commuters who will have yet a longer wait for significant traffic congestion relief.

Every argument AGAINST UNDERGROUND RAIL can easily be answered by citing the many instances in which mass transit and even major rail tunnels are beneath the water table, in more earthquake prone zones than Oahu, bored through even granite rock (which is MUCH harder than lava!) as well as through clay and softer rock.

The technology of a huge machine like bored the *Chunnel* makes arguments about the construction

HONOLULU COMMON SENSE TRANSIT
Rev & Mrs Samuel M. Smith & Family
P. O. Box 1015
Kailua, HI 96734 U. S. A.

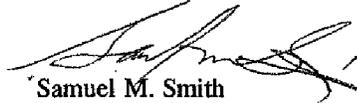
WEB: <http://www.followersofjesuschrist.org>
email: info@up-way-publications.org

2
problems of the local sewer system, which uses surface construction methods and is relatively shallow totally nonsense. Likewise, reference to the "Big Dig" fiasco in Boston, where surface dig and refill methods were used is not an option. At the VERY BUSIEST TRAFFIC HOUR, the *Chunnel*-type boring/tunnel building equipment could be boring 40 or 50 feet below the highway or street and nobody would even know that their stop and go surface traffic was immediately above the actively boring equipment.

I do agree that although your proposed elevated rail system doesn't look too bad as an eyesore, and would certainly get people from Point A to Point B far faster and cheaper than by their own cars, even factoring in the taxes to build the system. I would love to show you my copy of the History Channel's Modern Marvels: *The Chunnel* [<http://store.aetv.com/html/product/index.jhtml?id=42739>] DVD so you can see for yourself how practical the underground system would be.

I will not here take the time to revisit the many reasons **for UNDERGROUND AS AGAINST ELEVATED OR SURFACE, NOR THE REASONS WE URGENTLY NEED MASS TRANSIT NOW**. I am leaving most of those reasons as previously mailed to you below. I will also be mailing copies of this letter to you to all possible news media in an effort to raise public consciousness of how many delays and how much additional costs the elevated or surface routing would cause and the total practicality of building entirely underground, as well as several safety factors in which UNDERGROUND is safer.

For a better Honolulu for everyone,



Samuel M. Smith

June 15, 2008 letter is below and includes most of October 25, 2006 letter.

On October 25, 2006, I wrote the below letter to you and you responded and even sent me and my family a Thanksgiving greeting. You also had the Transit Study people send me a great and well-done DVD about the urgency of the need for Mass Transit ASAP. I therefore invested in a copy of the History Channel's Modern Marvels: *The Chunnel* [<http://store.aetv.com/html/product/index.jhtml?id=42739>] DVD which I had intended to get into the hands of then Transportation Chair Nestor Garcia, but somehow never seemed to be able to get it to him.

However, I would rather fight AGAINST the above ground rail than see the city make that major mistake. I HAVE SIGNED THE STOP RAIL NOW petition BUT I WILL DO ALL I CAN TO GET a YES vote to BUILD an UNDERGROUND rail system.

And I call your attention to the MAJOR money being spent by someone to advertise AGAINST ANY rail and ask WHO WOULD SPEND THAT KIND OF MONEY TO STOP RAIL? Now who will benefit from stopping Rail? Petroleum interests, Automobile dealers, Parking lot operators, Garage Mechanics. Now Insurance companies will of course seem neutral in the matter, but because higher accident rates will justify higher premiums, they might also benefit by stopping rail.

Please look at the advantages I have already listed in my October 25, 2006 letter below and factor in one more thing that I had not thought about before. IF A 100 PERCENT UNDERGROUND SYSTEM WERE TO BE BUILT THERE WOULD BE MANY THOUSANDS OF CUBIC YARDS OF FILL TO SAFELY EXTENT THE SHORELINE IN A PLANNED LOCATION AND THAT LAND COULD THEN BE SOLD AS WATERFRONT PROPERTY TO OFFSET MUCH OF THE COST OF BUILDING THE RAIL SYSTEM.

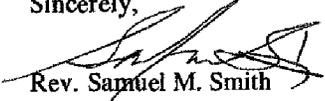
And again, in June 2008, I remind you that the construction tie-ups of an above ground system would make present traffic tie-ups look like nothing.

I also remind you of land acquisition costs if you do not build beneath existing roadways using EXISTING equipment that can operate there with NO DISRUPTION of the traffic above. You will have costly and divisive *eminent domain* suits to file for above ground rights of way, court delays and again, who will benefit? Petroleum interests, Automobile dealers, Parking lot operators, so of course they

are willing to spend BIG MONEY to stop rail and if YOU, Mayor, do not use my arguments linked to those showing the necessity of Mass Transit that were on the DVD you had the Transit Study people send me, the MISINFORMATION people will both get the issue on the Ballot, but will also get rail voted down. What a tragedy for EVERYONE!

Please, Mayor, I beg of you, reconsider and reevaluate 100 percent UNDERGROUND steel on steel rail. If you persist in the above ground FOOLISHNESS, I will SADLY be adding my voice to the ANTI Rail voices. I believe that at the rate it is now going, the petition will get more than enough signatures to get the issue on the ballot and with the misinformation already being promoted, it will lose. Who is paying the "volunteers" to stand outside Post Offices and other public places with petitions? I believe it is the Petroleum interests, Automobile dealers, Parking lot operators, etc.

Sincerely,



Rev. Samuel M. Smith

October letter follows:

On the 8:00 AM news on KHON TV2, a member of the Kakaako Neighborhood Board correctly and wisely spoke to the issue of the horrendous traffic tie-ups on Kapiolani Boulevard as a result of sewer work and lane closures. I wonder that neither you nor others involved in planning the URGENTLY NEEDED Mass Transit System have glibly overlooked this aspect of building an above ground metro system. Equipment is already in storage that has been tested and very successfully used to build the "Chunnel" between England and France and the BART in California's San Francisco Bay Area. The BART in particular has also already been tested by earthquake, so the evidence is clear that above ground Metro proponents' argument about water, rock and earthquake hazards to the underground system is a smokescreen.

I have previously contacted you on this subject and gave 17 good, valid, common-sense reasons for MASS TRANSIT NOW. If I repeat a few from this new angle please forgive me. (I would welcome a face-to-face debate on the issue before City Council and the media.)

While I URGENTLY support Mass Transit, I equally or with even greater emphasis OPPOSE an above ground system for the following reasons in order of importance:

1. MASSIVE traffic tie-ups during construction that are unavoidable for this type of construction.
2. Delays caused by battles over *eminent domain* rights and causes to acquire the necessary rights-of way.
3. Cost of right of way acquisition.
4. The already protested blockage of portions of Oahu scenery by the additional structures.

Benefits of the UNDERGROUND system are:

1. Construction machinery is available capable of boring the tunnels, creating a steel-reinforced concrete tunnel tube with **NO DISRUPTION OF SURFACE TRAFFIC** or buildings above. Spoil dirt is hauled out at the ends and concrete, steel and other materials needed by the machine are hauled in from the ends.
2. AND 3. No long court battles over *Eminent Domain* rights because virtually all needed right of way already exists beneath present highways, streets and roads. Only terminals or stations might require acquisition of land. Costs for hiring professional tunnel builders and their machinery easily offset by **LACK OF LAND ACQUISITION COST.**
4. No permanent above ground structures obstructing tourist (or our) view of our Native Oahu beauty.

Please do not overlook the URGENT need folks in the entire Leeward area have for MASS TRANSIT NOW!!! But at the same time, please don't overlook the awful gridlock of traffic that buiding an above ground system will unavoidably create. As I have pointed out before, EVERY taxpayer in Leeward Oahu has ALREADY paid FAR more in fuel costs, lost time and vehicle repair and vehicle replacement than the relatively small proposed tax increase that would have already had Mass Transit in place if misguided voters had not rejected the option several years ago.

Finally, our State and Oahu leaders are coming close to agreement that we really DO need MASS TRANSIT NOW. The widening of existing highways and addition of zipper lanes is almost counter productive as more land is gobbled and the fuel consumption and lost time situation is only slightly affected. What about the High Speed Ferry proposal to zoom people from Barbers Point or wherever else in that area that such a landing is decided upon. That is still subject to closing if storm conditions arise, making an even more problematic situation for Leeward residents on such days as people planning to use the ferry suddenly discover at the last minute that they will either have to drive, call a cab or catch a bus. This, I think, is something those pushing for the ferry boat idea seem to forget.

And if a Disneyland style monorail is built, consideration must be given to the disruption of traffic during the construction phase. This, in addition to the fact that it cannot help but at least partially block scenic views. And, since the VAST majority of those most urgently needing MASS TRANSIT NOW are residents needing to get to work on time, they have seen the sights and simply want to leave home as late as possible to arrive at work on time and return home or whatever else they must do with the least lost time commuting from their workplace to home, the UNDERGROUND rail system makes the MOST SENSE. With modern technology, tunnel boring machines such as built the England to France Chunnel and other similar equipment now in storage awaiting a time and place to be used again can easily build earthquake resistant and waterproof systems with only minimal surface support, minimal traffic disruption, no need for additional land, since they can be built beneath existing freeways and other rights-of-way.

For any who question the practicality of and the advantages to the UNDERGROUND mass transit systems for the unique conditions and needs of Oahu and Honolulu, I suggest you secure copies of the titles, Modern Marvels: **Tunnels** [<http://store.aetv.com/html/product/index.jhtml?id=12211>] or Modern Marvels: **The Chunnel** [<http://store.aetv.com/html/product/index.jhtml?id=42739>] and Modern Marvels: **The City Beneath Our Feet** [<http://store.aetv.com/html/product/index.jhtml?id=42738>]. These in order of their significance to Honolulu. Or, I can loan you my copy.

I would welcome a face-to-face debate on the issue before City Council and the media.



Rev. Samuel M. Smith

copy to All News Media,

Fiji: *next page. Apart from that, Happy Holidays,

A Leaderless Rail to Nowhere

Mufi says his electric train set is better than Ann's Lego-bus-bridge, a bridge that creates an bus-exclusive new H4, like H3 with no exits, from Ewa to Downtown. When will our elected leaders give us leadership with insight, rather than propose compromised either/or choices on the issue of transportation?

Dean Uchida in last Sunday's opinion piece (Star-Bulletin, p. E3) states, "the underlying issue is growth, not traffic." More specifically, it's land use, not traffic.

What makes the issue so compromised results from the fact that the O'ahu land holders come in two main categories: (1) Individual ownership in fee simple and (2) Trust ownership held exclusively by trustees for the common use of others (Federal Lands) and/or parceled out for individual use through leaseholds (Kamehameha Schools Trust, O.H.A., Public Lands). The first relates to lands that most would call, "private property" where the owners can sell it, like any other commodity to anyone else they please. The second form of land holding *in toto*, consists of property held in common for the benefit of a group of people and cannot be privatised to individuals by sale except under circumstances defined in the trust.

Nine percent of the level, arable land in the state of Hawai'i remains in the control of the Kamehameha Schools' Trust (The heir of Bernice Bishop's conveyance of all the "Royal Lands" to the benefit of the native Hawaiian peoples and their descendants.) Add to this the Office of Hawaiian Affairs lands, and those held by the State and the City and County of Honolulu, we can see that much, if not most all of the land in Hawai'i is held as a public trust for everyone or for all Hawaiian descendants and their *ohanas* collectively. Therefore, in no small measure, the common good of the Hawaiian people and the other citizens of the State and City and County of Honolulu should determine the optimal form of public transportation. Instead, they shift its cost to the tax base and declare it a universal benefit to all residents.

What confuses the matter are the large royal tracts of land that king's conveyed to relatives or retainers for exceptional service to the crown.

Unlike Mr. Bishop, who re-conveyed all of the remaining Royal Lands into a trust for the benefit of the native Hawaiians upon his wife's death and returned to live out his remaining years in San Francisco, others did not follow his example.

The beneficiaries of the Campbell Estate, for example, who had intermarried and became descendants of Prince Kuhio, held on to their large West O'ahu land holdings in a trust until 2007 when it was converted in a private family-owned corporation.

When it became no longer profitable to cultivate sugar cane and pineapple on these plantation plots, the beneficiaries sought to make the most of their privatised inheritance by converting the lands into residential housing sites. They pulled out the cash crops and planted individual fee simple single family homes that created a huge cash return and the suburban sprawl we now see from Waipahu to Kapolei.

To get past the federal lands held exclusively by the U.S. military in Pearl Harbor and south from Wahiawa, a narrow corridor of concrete was paved, and then expanded into the H1 freeway. Access to West O'ahu was assured. Development could move forward.

With the admission of Hawai'i in the United States as a state, the large landed estates became anomalies in the fee simple world of U.S. real estate. With the death of James Campbell's last surviving daughter, Beatrice Wrigley in 1987, the estate had twenty years, according to Campbell's will, to dissolve the trust and redistribute itself to its surviving heirs. The Campbell Estate thus expired in 2007. Rather than kill "the goose that laid the golden eggs," it was incorporated into the James Campbell Co. LLC. Most of the beneficiaries, thirty-one family members, became shareholders in the new company. Now the problem compounds. The new company secured \$645 million in debt financing in 2007 to create the new company and to fund its future investments.

From 1987 to 2007 the rush was on to develop more residential housing leaving it to the new owners to create the infrastructure as the needs arose. Now the company faces a cloudy financial picture given the collapse of the national financial system and the freezing of credit for housing. They hold a lot of debt with

a reduced income stream and a large chunk of undeveloped land that must be sold to have value.

To cover its maturing debts and to protect its developed assets in a depressed housing market devoid of easy credit, the company will probably have to sell a lot of raw land to just cover its current debt obligations in an attempt to realize its master development plan. The free market may cause the re-conveyance of these privatized lands to those who still have the cash and the duty to serve the common good: the Kamehameha Schools' Trust, the O.H.A., and the State of Hawai'i (We can buy Turtle Bay, can't we?) and the City and County of Honolulu (How much do we plan to pay for rail right-a-ways?).

Let the market set the price and, therefore, the tax rate on the land. With a little patience and with regular purchases, these four agencies should be able to acquire large tracts of undeveloped land in West O'ahu by 2010. The general public should be rewarded with a combined total of thousands of acres of new lands that can be converted to agricultural use and greater food independence (if not total self-sufficiency) without having to use the right of eminent domain to acquire them. (Energy independence is not our only common need.)

Now, all this raises the question: What would our transportation system look like given these new circumstances:

1. We have a lot of West O'ahu homeowners living in devalued homes with special needs that we need to accommodate.
2. We need to design a diversified crop and fruit tree development that can yield three harvests annually for all available lands.
3. We need to bring workers directly--non-stop--to their places of work at low cost and reduce road traffic congestion.
4. East O'ahu homeowners also suffer from unmet transportation and infrastructure needs as West O'ahu, we must identify and equitably resolve these urban dysfunctions.

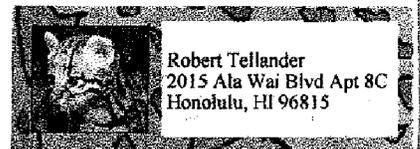
Rather than explain and expand on my own perspectives, however, I want my elected and wanna-be leaders to focus on and to respond to these four areas of concern. If they cannot: Do Not Vote for them.

If you are as frustrated as I am by the ineptitude to act insightfully and to resolve pressing social needs, may be you and I should start talking with our friends and neighbors to craft our own solutions and cause our elected leaders to follow our lead.

2008, as it turned out, is a Jubilee Year. Those with integrity, ethical insight and compassion for strangers will be rewarded whenever their proposals practically and for the better resolve some of our most currently compromised needs.

We should do that and not try to say an electric train solves these problems nor a non-stop bus ride to Downtown makes life better for all in O'ahu. It's inadequate leadership on a rail.

Robert Telfander
2015 Ala Wai Blvd. #8c
Honolulu, HI 96815-2002
808-946-9974



CHRISTMAS 2008



Married at 30; still together at 70.

After the completion of the condo remodel--an even more trying joint-venture--we pulled ourselves together and set off to celebrate our 40th wedding anniversary where it all began. This time, we returned to visit persons and places as members of the senior generation: Time had not stood still.

At the end of May, we left Lars (34), our youngest son, the Academy of Art guard, in Honolulu and commenced our two-month odyssey into our shared past. We started with our most recent memories among friends in Petaluma, CA; classmates at Princeton, NJ, and former roommates in the Washington, D.C. area. Then back to Europe and our families' origins.

First, to Paris, our honeymoon destination, among friends and family and on to Holland among Dutch friends and Feldbrugge cousins. (Breaking the pattern, we made a five-day detour among strangers to Prague.)

We picked up the family trail again in Sweden among the Tellander family cousins before returning to Boston where Erik (37), our oldest son, the architect [Wm. Rawn, Boston], picked us up and drove to his "new" (1801 A.D.) colonial manse on the Common in Amherst, NH. Here we got reacquainted with our grandchildren, Maja (5) and Nils (3) and our daughter-in-law, Lisa (37) and her visiting Housman parents, Ted and Margaret (Cape Cod), and sister, Karen (Singapore). (All of these members of our immediate and extended family will be coming to Honolulu for this Christmas and NEW year.)

We flew from New York City in separate airplanes: Marlise to Honolulu and Bob to Los Angeles, CA to visit his brother, Jack (75), in his nursing home in Santa Monica, CA and then home to Honolulu.

To see glimpses of what we saw, come visit us in Hawaii so you can show us what we missed while we were away from you. Let's have a happy NEW year! With all those we still know and love.

Alan E. Wickens
Ko Olina Fairways
92-1537 Aliinui Drive # E
Kapolei, Hawaii 96707-2230

3 December 2008

Wayne Yoshioka
Director of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813

Re: Professor Prevedouros' Letter in the 2 Dec 2008 Star Bulletin (enclosed)

Dear Mr. Yoshioka,

The referenced letter poses sixteen points which should be answered by your Department. I anticipate your response in the Star Bulletin.

In addition to the Professors' points would you also tell us where the rail yard and maintenance shops will be located? Will the yard and shops require additional condemnations? Also, will HECO be the sole provider of power or will there be a dedicated power source? If there is a dedicated power source (or perhaps a back-up source) will it be dependent upon fossil fuel? Will the rail cars have batteries so that they can "creep" to the next station in case of loss of primary power?

Sincerely,



Cc: Councilman Apo
Star Bulletin

DIRECTOR'S OFFICE
CITY AND COUNTY OF HONOLULU
DEPARTMENT OF
TRANSPORTATION SERVICES

08 DEC 4 P 1: 25

RECEIVED

Make sure you get the rail system you want



GATHERING PLACE

Panos Prevedourous

Regardless of whether you are for or against rail, the Draft Environmental Impact Statement (DEIS) is the document that should provide answers to all reasonable impacts. Does it? Here is a sample of questions:

>> The bus routes will change. What happens to your route? What happens to express buses?

>> Lanes will be taken away, some temporarily for construction and some permanently. Where are those lane closures and what's their duration? Are there traffic rerouting plans?

>> Will bikes, surfboards or luggage be allowed on the train? What about large items purchased at a big box retailer? What's the size limitation?

>> Will there be washrooms at the stations? How about convenience stores, vending machines? Will the platforms have seats? How many?

>> The plan calls for Aloun farms to relocate. Is that possible? Where will they go?

>> Sewer upgrades in Kailua and Kapoian led to the loss of businesses and jobs. Are details provided about similar effects during the construction of the rail?

>> Rail construction involves unique skills and certifications that Hawaii construction workers do not have. How will this be addressed?

>> The city has declared that in many cases only a portion of a parcel needs to be condemned. Can the business survive with the remaining portion? Isn't this mandatory downsizing and fewer jobs?

>> There are 16 schools adjacent to the route. Will the over-

head structure, the continuous high current exposure and the intermittent noise and vibration affect the learning environment? Would it be prudent to relocate these schools?

>> Does rail fit our Hawaiian sense of place? How was the impact to tourism and local quality of life by a large elevated structure through town been assessed?

>> Does the DEIS address the affected vistas and scenery? Are the aesthetics of the structure and each station explained and presented adequately?

>> What will happen in the event of a hurricane? Will the train operate? Light rail in Houston was shut down for 10 days due to Hurricane Ike.

>> BART in the Bay Area uses rail cars made of aluminum to combat corrosion. Is the city's position that corrosion is not an issue?

>> It appears that general excise tax surcharge proceeds for rail will be much lower than expected for at least four years in a row. How is this deficit going to be made up?

>> If ridership turns out to be much lower than forecast, then what? If the city is forced to provide free train rides like in Puerto Rico, how is the shortfall going to be covered?

>> Is there a detailed plan for the effect of rail construction on water, sewer, gas and electric utilities? Will there be disruptions of service? Does the budget cover all these?

I urge you to review the DEIS and seek answers to the questions that are important to you. Write to the city director of transportation with your questions and concerns and send copies to the City Council and the governor.

Regardless of whether you want rail or not, if the city builds the rail system, then make sure that it is done in a way that satisfies your needs and concerns.

Panos D. Prevedourous is a professor of transportation engineering at the University of Hawaii-Manoa. He ran an unsuccessful campaign for mayor as an anti-rail candidate.

RECORD # 475 DETAILS

Status : Initial Action Needed
Creation Date : 1/31/2009
Creator Affiliation :
First Name : Michelle
Last Name : Yamaguchi
Business/Organization :
Address : 956 Hunakai St.
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96816
Email : raedey@msn.com
Telephone : 808.732.0046
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 01/31/2009
Submission Content/Notes : Please tell me it's not true that the first leg of the transit to be built will run from Kapolei to Ewa/Ewa Beach. That would be silly and ridiculous.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 476 DETAILS

Status : Initial Action Needed
Creation Date : 2/2/2009
Creator Affiliation :
First Name : Mary
Last Name : Avenido
Business/Organization :
Address : 911027 Kaikoele Street
Alternative Preference :
Apt./Suite No. :
City : Ewa Beach
State : HI
Zip Code : 96706
Email : mlynnem@hotmail.com
Telephone : 8086896039
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 02/02/2009
Submission Content/Notes : Go thru the airport! I ride the 42 from Ewa Beach every morning and the rail going to the airport would continue close to the same route. Also when I travel it is too expensive to park at the airport; with the rail, tourists would also benefit. It might take away from the taxi business from the airport but tourists would spend more on the local economy if they didn't have the huge fare to and from Waikiki.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 477 DETAILS

Status : Initial Action Needed
Creation Date : 2/2/2009
Creator Affiliation :
First Name : Ben
Last Name : Ramelb
Business/Organization :
Address : 1148 Ala Liliko'i St
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96818
Email : ramelbb001@hawaii.rr.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 02/02/2009

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue: Fixed Guide
way Alternative is not Cost Effective because it does not provide traffic
relief despite its cost of at least \$6.0 Billion

Facts:

Table 3-12 of the 2006 Alternative Analysis shows that the a.m. Koko
Head Bound at Kalauao Stream traffic volume on H-1 Freeway (volume
capacity = 9,500 vph) will increase from 10,960 vehicles per hour to
17,209 vph in year 2030. This congestion will increase after the \$6.0
Billion Fixed guideway is built and operating. This raises the question:
Why build a \$6.0 Billion rail if it does not eliminated or substantially
reduce the congestion on H-1 at Kalauao Stream? The very high cost of
the rail is certainly not cost effective if it does not reduce the congestion
on H-1 at the H-1/H-2 merge and at the H-1 middle Street merge during
the a.m Koko Head bound peak hour traffic.

Discussion:

A combination of a new Kamehameha Flyover at a cost of \$320 million
and a Nimitz Flyover at a cost of \$240 million is cost effective which will
eliminate the congestion on H-1 at Kalauao Stream and at Middle Street
merge and is a superior alternative to the fixed guideway.

Kamehameha Flyover, Reversible HOV:

The Kamehameha HOV Flyover (Reversible) is a 3-mile reversible,
elevated, three-lane structure over the median of Kamehameha Highway
from the H-1/H-2 merge at the Waiawa Interchange to the Airport
Viaduct just east of the Aloha Stadium. The Flyover would be built
similar to the Tampa Elevated three-lane Reversible HOV as described
in- <http://www.tollroadsnews.com/node/172> .

The Kamehameha Flyover would be connected to H-1, H-2,
Kamehameha Highway and Farrington Highway at the west end and to
the Airport Viaduct at the east end. These connections are described in
a Managed Lane Study "Transportation Alternatives Analysis for
Mitigating Traffic congestion between Leeward Oahu and Honolulu". The
full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.

The initial 2005 cost for the 10 mile Tampa Reversible was \$320 million
or \$32 Million per highway mile, however, a geotechnical design error
increased the cost to \$420 million or \$42 million per mile. Using a
geographic and escalation factor of 100 percent, the 4-mile
Kamehameha HOV Flyover at \$60 to \$80 million per mile would cost
between \$240 million to \$320 million.

The Kamehameha Three-Lane HOV Reversible Flyover has a capacity
of 6,000 high occupancy vehicles per hour (equivalent 21,600

commuters per hour). This capacity is based on HOV use on Flyover by 200 express buses per peak hour, car pools, van pools, green cars and HOV2. (50 pns per express bus and 5800 vph at avge 2 pns per vehicle).

There is a projected 8,000 vph overload on H-1 during am peak at Kaluaao Stream per Table 3-12 of the Alternative Analysis. This 8,000 vph overload equates to 9,600 commuters per hour. Therefore, the three-lane Kamehameha Flyover (cap = 21,600 commuters) has ample capacity to accommodate the H-1 overload (9,600 commuters).

The Draft Environmental Impact Statement (DEIS) - Honolulu High-Capacity Transit Corridor Project Nov 2008, shows the rail route over Kamehameha Highway between Pearl City and Aloha Stadium which could conflict with the proposed three-lane "Kamehameha Flyover" route outlined above. If the rail is built, it is suggested that both the Kamehameha Highway "Flyover" and the Rail be built within the elevated Kamehameha Highway corridor. In this case, only a two-lane "Kamehameha Flyover" is needed (instead of three-lanes) to be built alongside and parallel to the Rail transit. The rail with a capacity of 6,000 commuters per hour and the two-lane "Kamehameha Flyover", with a capacity of 4,000 vehicles per hour, should be adequate to substantially reduce the bottleneck at the H-1/H-2 merge and the traffic congestion on H-1 between Pearl City and Aloha Stadium.

Nimitz Flyover, Reversible HOV:

The Nimitz HOV Flyover is a 3-mile reversible, elevated, three-lane structure over the Nimitz Highway median from the Airport Viaduct at Keehi Lagoon to Hotel Street and Alakea St/Halekauwila St. The Flyover would be built similar to the Tampa Elevated three-lane Reversible HOV as described in-

<http://www.tollroadsnews.com/node/172>

One of the three lanes would exit the Flyover at Waikamilo Rd. to provide access to job centers in Kalihi, resulting in the Flyover having only two lanes entering downtown. The downtown terminal connections from the Nimitz HOV Flyover include an elevated busway from Iwilei to Hotel Street and a single lane underpass to both Alakea St/Halekauwila Streets. These connections are described in a Managed Lane Study "Transportation Alternatives Analysis for Mitigating Traffic congestion between Leeward Oahu and Honolulu". The full report is available at www.eng.hawaii.edu/~panos/UHCS.pdf.

The initial 2005 cost for the 10 mile Tampa Reversible was \$320 million or \$32 Million per highway mile, however, a geotechnical design error increased the cost to \$420 million or \$42 million per mile. Using a geographic and escalation factor of 100 percent, the 3-mile Nimitz HOV Flyover at \$60 to \$80 million per mile would cost \$180 million to \$240 million.

The "Nimitz Flyover" has an approved Final Environmental Impact Statement which allows for early construction.

Conclusion:

The \$6.0 Billion Fixed guideway rail is NOT cost effective because it does not eliminate the congestion at the H-1/H-2 merge and at the H-1 Middle Street merge while the \$320 million Kamehameha Flyover and \$240 million Nimitz Flyover are very cost effective because both have

lower construction cost as compared with the Fixed rail guideway.

Recommendation:

It is recommended that DEIS include a Kamehameha Flyover (reversible three lane elevated) and a Nimitz Flyover (reversible three lane elevated) as a transit Alternative to provide traffic relief.
Respectfully,

Ben Ramelb P.E.
1148 Ala Liliko'i St
Honolulu, HI
96818

Copy to:
Mr. Ted Matley
FTA Region IX
201 Mission St. Suite 1650
San Francisco, CA 94105
FAX 415-744-2726

Governor Linda Lingle
Hawaii State Capitol
415 S Beretania St. 5th Floor
Honolulu, HI 96813
FAX (808) 586-0006

Honolulu City Council Members
FAX (808) 867-5011

Reply Requested :
Submission Type :
**FOIA (Freedom of
Information Request)
Request :**
FOIA Referral Date :
FOIA Response Date :

Yes
Draft EIS Comment

RECORD # 478 DETAILS

Status : Initial Action Needed
Creation Date : 2/2/2009
Creator Affiliation :
First Name : Mary
Last Name : Avenido
Business/Organization :
Address : 911027 Kaikoele Street
Alternative Preference :
Apt./Suite No. :
City : Ewa Beach
State : HI
Zip Code : 96706
Email : mlynnem@hotmail.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 02/02/2009
Submission Content/Notes : Have you ever considered having the rail pre-fabricated and shipped here?

Seems that in the long run it would be cheaper, and use a company that already knows how to build a system.

Here it takes forever to get the Ft Weaver Road widened..first it is this and that, then bankrupt company, then out to new bid.

Get it from the mainland and pay the premium if they finish early like the Minnesota bridge.

Here it seems that the longer it takes to complete the better; just ship it and put it together. It would still mean jobs here and the completion time would be much faster.

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 479 DETAILS

Status : Initial Action Needed
Creation Date : 2/2/2009
Creator Affiliation : Other
First Name : Ben
Last Name : Ramelb
Business/Organization :
Address : 1148 Ala Lilikoi St
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Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96818
Email : ramelbb001@hawaii.rr.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 02/02/2009

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue: Land Acquisition
should be minimized by routing the fixed guideway over Nimitz Highway
instead of over Dillingham Boulevard.

Fact:
Numerous land acquisitions are required to build the fixed guideway
along Dillingham Blvd which will cause disruption to businesses, homes
and increase traffic congestion on Dillingham Blvd.

A fixed guideway route over Nimitz Highway instead of along Dillingham
Blvd will cause less disruption and result in lower cost for the project.

It is noted that the Oahu Regional Transportation Plan (ORTP) 2030
shows a two lane Nimitz Flyover over the median of Nimitz Highway
which could conflict with the proposed fixed guideway over Nimitz
Highway. If the Nimitz Flyover is built, it is suggested that both the
Nimitz "Flyover" and the fixed guideway be built within the elevated
Nimitz Highway right of way corridor. In this case, the two-lane "Nimitz
HOV Flyover (reversible)" can be built alongside and parallel to the fixed
guideway transit. The fixed guideway with a capacity of 6,000
commuters per hour and the two-lane "Nimitz Flyover", with a capacity of
4,000 vehicles per hour, should be adequate to substantially reduce the
bottleneck at the Middle Street Merge and on Dillingham Blvd between
Keehi Lagoon and downtown Hotel Street.

The Nimitz Flyover (reversible) should be connected to the Airport
Viaduct at Keehi Lagoon to Alakea Street/Halekauwila St via an
underpass and to Hotel Street Mall via an elevated busway. These
connections are described in a Managed Lane Study "Transportation
Alternatives Analysis for Mitigating Traffic congestion between Leeward
Oahu and Honolulu". The full report is available at
www.eng.hawaii.edu/~panos/UHCS.pdf.

The initial 2005 cost for the 10 mile Tampa Reversible was \$320 million
or \$32 Million per highway mile, however, a geotechnical design error
increased the cost to \$420 million or \$42 million per mile. Using a
geographic and escalation factor of 100 percent, the 3-mile Nimitz HOV
Reversible Flyover at \$60 to \$80 million per mile would cost between
\$180 million to \$240 million.

Recommendation:

It is recommended that the fixed guideway route be over Nimitz Highway
instead of Dillingham Blvd to minimize disruption of homes and

businesses and minimize traffic congestion along Dillingham Blvd.

Respectfully,

Ben Ramelb P.E.
1148 Ala Liliko'i St
Honolulu, HI
96818

Copy to:
Mr. Ted Matley
FTA Region IX
201 Mission St. Suite 1650
San Francisco, CA 94105
FAX 415-744-2726

Governor Linda Lingle
Hawaii State Capitol
415 S Beretania St. 5th Floor
Honolulu, HI 96813
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Honolulu City Council Members
FAX (808) 867-5011

Reply Requested :
Submission Type :
**FOIA (Freedom of
Information Request)
Request :**
FOIA Referral Date :
FOIA Response Date :

Yes
Draft EIS Comment

RECORD # 481 DETAILS

Status : Initial Action Needed
Creation Date : 2/2/2009
Creator Affiliation : Other
First Name : Ben
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State : HI
Zip Code : 96818
Email : ramelbb001@hawaii.rr.com
Telephone :
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 02/02/2009

Submission Content/Notes : 29 December, 2008

To:
Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
HI 96813
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS)
"Honolulu High-capacity transit corridor Project", Issue- Project
Construction Phasing will not provide early traffic relief

Fact:
The rail project construction phasing is proposed in four phases as
discussed on DEIS page 2-38 and as shown on Figure 2-44 as follows:

- East Kapolei to Pearl Highlands (First Construction Phase)
- Pearl Highlands to Aloha Stadium (Second Construction Phase)
- Aloha Stadium to Middle Street (Third Construction Phase)
- Middle Street to Ala Moana Shopping Center (Fourth and final
Construction Phase)

Discussion:

The primary purpose of any mass transit system is to provide traffic relief
and to provide relief in the near term. The major West and Central Oahu
traffic bottlenecks are at the Middle Street merge and at the H-1/H2
merge. Construction phases for the rail should be prioritized to reduce
the traffic bottlenecks at these two locations. Therefore, the project
construction phasing shown above should be reversed:

- Middle Street to Ala Moana Shopping Center (First Construction
Phase)
- Aloha Stadium to Middle Street (Second Construction Phase)
- Pearl Highlands to Aloha Stadium (Third Construction Phase)
- East Kapolei to Pearl Highlands (Fourth Construction Phase)

This revised project phasing is logical because:

- a) The Middle Street to Ala Moana Shopping Center first phase will
provide early traffic relief to the Middle Street bottle neck.
- b) The funding source for the entire 20 mile segment is not guaranteed,
recognizing that the General Excise Tax is not meeting projections in
revenue due to the expected long term slumping economy. The
taxpayer will not tolerate any increase in property tax or GET to fund any
rail fund shortfall.
- c) The funding amount from the Federal Transit Authority is not
guaranteed.
- d) If rail funds are delayed, providing traffic relief to the traffic
bottlenecks on H-1 will be delayed.

e) Each phase for rail will provide the maximum bang for the dollar. The rail will be completely be useable and serve the most number of commuters as each phase is completed. Conversely, the Kapolei to Pearl Highlands would serve very few commuters as most commuters will be destined for east of Pearl Harbor and beyond in the easterly direction.

Vehicle Maintenance and Storage Facility for each construction phase can be temporarily established to support each construction phase as modified:

- a) For the Middle Street phase, some 40 acres could be obtained along Lagoon Drive to include portions of Keehi Lagoon Park, Airport vacant areas and commercial businesses including Used Car Lots. At least 10 acres for park and ride can be acquired in the airport area alongside Aolele Street and Lagoon Drive.
- b) For the Aloha Stadium phase, portions of the Aloha Stadium Parking lot can be temporarily used for the Storage Facility and temp facilities for vehicle maintenance.
- c) For the Pearl Highlands Phase, a 43-acre vacant site near Leeward Community College is available (DEIS figure 2-42).
- d) A 41-acre site is identified for the Kapolei phase (DEIS figure 2-41).

Conclusion:

Construction of the Middle Street to Ala Moana Phase as a first priority is consistent with providing near-term traffic relief, will initially serve the most number of commuters, will be completely useable and cost effective, and will not force the taxpayer to pay more taxes to fund additional rail segments should rail funding sources not achieve revenue projections.

Recommendation:

The DEIS should reverse the construction project phasing as discussed above starting with the Middle Street to Ala Moana Shopping Center as the First Phase.

Respectfully,

Ben Ramelb P.E.
1148 Ala Lilikoi St
Honolulu, HI
96818

Copy to:

1) Mr. Ted Matley
FTA Region IX
201 Mission St. Suite 1650
San Francisco, CA 94105
FAX 415-744-2726

2) Governor Linda Lingle
Hawaii State Capitol
415 S Beretania St. 5th Floor
Honolulu, HI 96813

FAX (808) 586-0006

3) Honolulu City Council Members
FAX (808) 867-5011

Reply Requested :

Yes

Submission Type :

Draft EIS Comment

**FOIA (Freedom of
Information Request)
Request :**

FOIA Referral Date :

FOIA Response Date :

RECORD # 482 DETAILS

Status : Initial Action Needed
Creation Date : 2/2/2009
Creator Affiliation :
First Name : Carolynn
Last Name : Ruth
Business/Organization : Public Storage
Address : 701 Western Avenue
Alternative Preference :
Apt./Suite No. :
City : Glendale
State : CA
Zip Code : 91201
Email : cruth@publicstorage.com
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 02/02/2009
Submission Content/Notes : Public Storage owns the property at 989 Kamehameha Hwy in Pearl City (the Property).
It is Public Storage's understanding, as of February 2, 2009, that no portion of the Property at will be acquired for this project.
Provided no portion of the Property is taking and the project improvements do not negatively affect the Property, Public Storage has no objections to a project that will improve traffic flow in the area.
Negative impacts would include, but are not limited to, over-steepening of the Property's driveway slope, interference with proper drainage from the Property, decreasing turning radii such that truck access is restricted or difficult, or impeding visibility of the Property.

Carolynn Ruth
Real Estate Paralegal
Public Storage
701 Western Avenue
Glendale, CA 91201-2349
Tel: 818.244.8080 x1410
Fax: 818.543.7341
Email: cruth@publicstorage.com

Reply Requested :
Submission Type : Draft EIS Comment

RECORD # 484 DETAILS

Status : Initial Action Needed
Creation Date : 2/3/2009
Creator Affiliation :
First Name : Earl
Last Name : Handy
Business/Organization :
Address : 47-226 Iuiu Street
Alternative Preference :
Apt./Suite No. :
City : Kaneohe
State : HI
Zip Code : 96744
Email : ehandy@hotmail.com
Telephone : 808-239-8037
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 02/03/2009
Submission Content/Notes : I think the route on the city side of Oahu is well thought out. I would like to see a link to the windward side however. The best was to do that would be to seek funding from the federal government and connect Pearl Harbour with the Kaneohe Bay Marine Base following the H3 Highway. A station placed as close to the Windward shopping center near the Like Like Hwy would be best. I hope that all the trains acomodate bicycles is some way like the Bart trains in San Fransico where bikes can be taken aboard the last car.
Reply Requested : Yes
Submission Type : Comment/Suggestion
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 485 DETAILS

Status : Initial Action Needed
Creation Date : 2/3/2009
Creator Affiliation :
First Name : James
Last Name : Ha
Business/Organization :
Address : 1201 Liliha Street
Alternative Preference :
Apt./Suite No. : 202
City : Honolulu
State : HI
Zip Code : 96817
Email : jamesha@hawaii.edu
Telephone :
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 02/03/2009
Submission Content/Notes : Hello, Please add an station on Liliha Street.
Reply Requested : Yes
Submission Type : Comment/Suggestion
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 486 DETAILS

Status : Initial Action Needed
Creation Date : 2/3/2009
Creator Affiliation :
First Name : Joe
Last Name : Dicken
Business/Organization :
Address : 2714 Nakookoo Street
Alternative Preference :
Apt./Suite No. : #A1
City : Honolulu
State : HI
Zip Code : 96826
Email : funktuation@yahoo.com
Telephone :
Telephone Extension :
Add to Mailing List : Standard
Submission Method : Website
Other Submission Method :
Submission Date : 02/03/2009

Submission Content/Notes : Fine, build the rail between Farrington highway and Ala Moana center. Now compare the population density between Farrington highway and Kapolei and between Ala Moana center and Hawaii Kai. Then think about it and stop messing around. You are a tool of the developers and polocation. The problem is that these developers will be living for half as long as the people building and using this. Put in on the ground & built it where the people are!!!

The EIS system is inherently flawed.

First, how can you have a discussion with someone when they say something then you respond (like I am doing right now) then they say they took your response into consideration. That is it. That is all you have to do. Now consider how easy that would be if individuals (PB) did not want to present an objective EIS. Is that what the person reading this is supposed to be? Think objectively? Is that what DOT hired you to be? I think not. The process does not evaluate the impact.

Secondly, under no measure can you say that you even attempted to address cumulative impacts. It is so bias and subjective that 1+1+1+1 is not even remotely an appropriate to think about it. Perhaps, if you should start with the premise that it is small remote island in the middle of the biggest ocean in the world, then you'll realize the cumulative impact is enormous. Do you consider where the materials are manufactured? The safety standards in those countries? Are those people making a living wage? Where the fossil fuel comes from to manufacture the raw materials and power the rail? Finally, does it enhance O'ahu's NATURAL environment? . Maybe some of these basic ideas will help your 'cumulative' analysis. When all is done, the rail may be a good thing, but the EIS is a political tool. In the end I hope you the best, but for now it is a sad, mundane example of environmental assessment for the next generation.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Yes
Draft EIS Comment

RECORD # 487 DETAILS

Status : Initial Action Needed
Creation Date : 2/3/2009
Creator Affiliation :
First Name : Greg
Last Name : Leong
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
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Zip Code : 94602
Email : greg_leong@hotmail.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 02/03/2009
Submission Content/Notes : I believe that rail transit is the answer to much of the issues surrounding the growth on the West side of Oahu. This will reduce the a great deal of the traffic into Honolulu. As a rail transit professional in California and also a resident of Kapolei, I have a real interest in this project both professionally and personally. Please advise me on any project advancement as well as any opportunities for employment. Thank you.
Reply Requested : Yes
Submission Type : Information Request
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 488 DETAILS

Status : Initial Action Needed
Creation Date : 2/3/2009
Creator Affiliation :
First Name : Richard
Last Name : Mori
Business/Organization :
Address : 94-742 Kaaka Street
Alternative Preference :
Apt./Suite No. :
City : Waipahu
State : HI
Zip Code : 96797
Email : morir00@hawaii.rr.com
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 02/03/2009

Submission Content/Notes : The so called "experts" who dismissed Maglev by stating: ("none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail.") are dooming the people of HAWAII to an inferior more expensive system. Allowed to compete and bid the MAGLEV would offer: 1. Less construction costs due to the concrete work being approximately 25% less and construction time would be sped up. The smaller guideway (21 feet versus 31 feet wide for steel) would result in a savings of over HALF A BILLION DOLLARS. 2. As shown in the DEIS O&M costs the MAGLEV also excels as there is nothing to wear out compared to steel. With the steel (YOE) dollars for O & M costs of \$133 Million/year, assuming a 25% savings; over 30 years the cost saving in O & M is approximately 1 BILLION DOLLARS!!! All the cost savings could be used to complete the whole system from Kapolei to UH Manoa. 3. The noise level for MAGLEV is also 3.5 times less (62 dba versus 80 DBA for steel), This would have less impact on the adjacent residents to the rail line and would preclude the need of additional costs for noise walls along the route. The steel system would have to be in compliance with the HRS. This would be an eyesore and would be a magnet for graffiti. With successful commercial operation in Nagoya Japan with no accidents which compare to the 6 steel accidents on the mainland in the past 8 months. 4. Safety is of utmost importance; due to the wrap around design there is no chance for derailment as opposed to steel. Steel would require drivers further adding to the costs to our taxpayers that are already paying the highest in the nation. MAGLEV would be completely automated. Finally the superior hill climbing ability of MAGLEV is vastly superior to steel. I WANT THE BEST RAIL SYSTEM FOR THIS SPECIAL PLACE WE CALL HAWAII. I JUST HOPE THAT YOU DO TOO!!!

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

From: G. ONISHI [mailto:g_onishi@msn.com]
Sent: Monday, February 02, 2009 8:14 PM
To: Yoshioka, Wayne
Subject: Honolulu Rail DEIS Comments

Dear Mr. Yoshioka,

2/4/2009

Thank you for allowing me to submit my comments on the proposed Honolulu Rail DEIS. I've attached it in Adobe PDF format. If I can be of any help, please respond to this email address.

Thank you,

G. Onishi
Email: g_onishi@msn.com

DISCLAIMER: This message is only intended for the addressee named above. Its contents may be confidential, privileged or otherwise protected. Any unauthorized use, disclosure or copying of this message or its contents is prohibited. If you are not the intended recipient, (i) please do not read or disclose it to others, (ii) please notify the sender by reply e-mail or phone, and (iii) please delete this communication from your system.

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2/4/2009

AR00057462

**Honolulu Rail DEIS Comments
Regarding Route Termination at Ala Moana Center**

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, HI 96813

February 2, 2009

Dear Mr. Yoshioka, Mr. Matley and reviewing board,

Thank you for reviewing my comments to the City's DEIS on Honolulu's proposed rail system. I'd like to submit the current DEIS has neglected to present the details on the complete route approved by the city council and expected by the public.

Timeline:

1. In 2006, the City Council approved the fixed guide way route from East Kapolei to the University of Hawaii Manoa with a connection to Waikiki (DTS2006b).
2. In this past 2008 general election, there was a ballot question to approve or disapprove the fixed guide way system.
 - a) The last information the public had on the proposed route was based in the Locally Preferred Alternative approved by the city council. The route was to go from Kapolei to University of Hawaii, Manoa and Waikiki.
 - b) The city and other entities created television, print and radio ads showing students excited on a convenient way to get to school.
3. The DEIS came out after the general election.
 - a) The DEIS does not contain any details of the route past Ala Moana Center.
 - b) The DEIS does not contain any feasibility figures of the full route including UH Manoa or Waikiki.

The public was presented a route which included Kapolei, UH Manoa and Waikiki. The Manoa and Waikiki spurs may be future spurs; however, it will impact the current route. Full disclosure on its impact and viability should be included in this DEIS.

Thank you,

Gary Onishi
g_onishi@msn.com

From: Nancy Nagamine [mailto:alohanan@hawaii.rr.com]
Sent: Tuesday, February 03, 2009 10:22 PM
To: Yoshioka, Wayne
Subject: Honolulu Transit Project DEIS comments

Feb. 1, 2009

Mr. Wayne Yoshioka

Department of Transportation Services

2/4/2009

City and County of Honolulu

650 S. King St. 3rd Floor

Honolulu, HI 96813

Dear Sir,

Regarding the Honolulu High Capacity Transit Project, I have concerns that are not adequately addressed in the DEIS. I will refer to this project in this correspondence as "the train". I am requesting a response as I feel these issues need further clarification. My concerns specifically relate to power outages that occur regularly in Hawaii, caused by storms as well as for unexplained reasons. Our power grid is not tied in to a neighboring state and we have little alternate power available. Our electricity system is not as modern as most other states in the US as this island chain is almost 2500 miles away from the nearest land mass. We experience unique tropical weather patterns causing regular major power outages that we are used to just dealing with.

During the recent power outage on December 26, 2008 on Oahu a representative from the City and County of Honolulu was on the radio and several people called in expressing concern about what would happen to the train during a massive power outage such as the one we were experiencing at that time. That official assured listeners there would be backup power for the train, however I feel this issue has not been adequately addressed in the DEIS.

In reviewing the table of contents I cannot locate anything about alternate generators that will take over in the event of a power outage. Could you please provide me with the location in the DEIS of the specific electricity plan for the train should a power outage such as the one that occurred on December 26, 2008 occur once the train is up and running?

I would like information on the cost of such a system, the planned operating expenses, the planned maintenance of this system, the manpower needed to operate such a system, the location of these alternate generators, and how exactly this backup plan would be implemented. I would like to see the entire backup power system described in full detail along with supporting financial estimates.

Could you please address how it would be justified as well to use the generator for the purpose of the train when hospitals, schools, and homes would need this alternate power source during this time? Please also address the affect of the loss of power on emergency vehicles who may need to get to point a to point b with no alternate route as they would not be able to use the train tracks.

2/4/2009

Another issue that has not been adequately addressed in the DEIS is the affect of a hurricane or earthquake on the train. I understand that during the recent hurricane in Houston Texas (Ike) their train was shut down for several days and I would anticipate the same here. I would like to know how loss of power for this system would be mitigated, and how the effects of tropical weather would be mitigated.

It is hard to imagine that if in Houston Texas it took several days to get their train up and running it would take any less time here. Everything takes longer in Hawaii. Please provide the comparison of our system vs. Houston's system as it relates to a hurricane or earthquake.

Thank you in advance for your detailed response.

Nancy Nagamine

42 Namala Place

Kailua, HI 96734

cc. Mr. Ted Matley, FTA

Governor Linda Lingle

2/4/2009

RECORD # 491 DETAILS

Status : Initial Action Needed
Creation Date : 2/4/2009
Creator Affiliation :
First Name : Moses
Last Name : Akana
Business/Organization : Federal Aviation Administration, Honolulu Control Facility
Address : 760 Worchester Avenue
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96818
Email : moses.akana@faa.gov
Telephone : 808.840.6135
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 02/04/2009
Submission Content/Notes : The height of the platform station along Aolele Street should not alter the flight path of aircraft landing or taking off from Honolulu International Airport. Prior to construction, an aeronautical study must be performed to ensure there is no impact to flight operations.
Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

From: Nancy Nagamine [<mailto:alohanana@hawaii.rr.com>]
Sent: Wed 2/4/2009 12:31 AM
To: Matley, Ted <FTA>
Cc: wyoshioka@honolulu.gov
Subject: Honolulu Rail Project DEIS

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

Dear Sir,

Regarding the proposed rail transit system in Honolulu, and the DEIS that is currently being reviewed, I would like to point out some flaws in the process of determining the locally preferred alternative, thus flaws in the DEIS, and the outcome of the recent election.

I do not feel there was fair public input in determining the locally

<https://mail.pbworld.com/exchange/YoshiokaD/Inbox/FW:%20Honolulu%20Rail%20Proje...> 2/4/2009

preferred alternative. Thus, alternatives were not evaluated in the DEIS, rather 3 different rail routes or a no build alternative.

I also feel the public was swayed using tax money to influence the vote in favor of rail.

I also feel the city council of Honolulu ignored public input on the issue and did not answer questions raised by voters.

Review the following personal experiences with this process:

Sometime during 2006: I attended a city council meeting on the issue. Hundreds of people testified, I waited for several hours and had to leave to go back to work. It was difficult to even get in the room because of all the union members who were there.

Sometime during 2006: The city asked for input as they were determining the "locally preferred alternative". I provided my input, which was against rail and in favor of improving the bus system. I got no response other than an acknowledgment and I was put on the city mailing list so I would get their slick shiny brochures promoting their rail project every month.

November 2006: I attended a meeting at Windward Community College and testified against rail. My estimate is there were 40 people who testified, 5 in favor of rail and 35 against rail. Several city council members were there, and there was little dialog. There was no further response to any testimony.

August 28, 2007 I sent a letter to the City Council asking questions regarding what was going on (letter below) and I DID NOT EVER GET A RESPONSE.

From 2007 through June 2008 2.6 million dollars of tax money was spent on advertising and "public outreach" to promote the rail project.

July 2008 through mid October 2008 unknown amounts of additional taxpayer money was spent on massive advertising blitz including print media and radio and public outreach meetings, which promoted this project and influenced the vote. These meetings were all held during October, and an 8 page, full color glossy brochure was inserted in the 3 major newspapers two weeks before the election, all paid for with tax dollars.

November 2008 outcome of the vote:
The vote was clearly influenced. 50.6% of the voters voted in favor of rail, the balance voted against or didn't vote on the issue. Had both sides had equal access to resources, then the vote would have been fair, however the City had TAXPAYER money to spend, thus the election was unfairly influenced.

Although the mayor and city powers claimed they listened to public input, from personal experience that was not at all the case. Rather, people attended meetings and provided feedback to city council members and heard nothing back. The city had no interest in listening to what

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people had to say.

Where is the public testimony, and where is the city's response to that testimony? What happened to everything people said? Was it totally dismissed? Where are the spending records, how much money was really spent influencing the vote?

Why did I not get my questions of city council members from August 28, 2007 answered?

This project has been handled in an underhanded fashion from day one and I feel it is my civic duty that you should be aware of the kind of manipulation that went on during the entire process. I urge you to dismiss this DEIS, it is seriously flawed.

Yours very truly,

Nancy Nagamine
42 Namala Place
Kailua, HI 96734

CC Wane Yoshioka, City and County of Honolulu
Governor Linda Lingle, Governor of the State of Hawaii

LETTER REFERENCED ABOVE SENT TO CITY COUNCIL:

August 28, 2007

What is going on at Honolulu Hale?

Since August 7 I have read every editorial regarding the 5 billion dollar fixed rail project that has been printed in the Honolulu Advertiser. Results as follows:

In favor of the project: 4

Against the project/ see better alternatives: 12

Pro arguments are quite weak with the predominant ones being that we need rail because people are tired of sitting in traffic and that we have talked about it long enough, let's just go ahead with it. (It has been proven that the rail project will not help with traffic congestion.)

Opposing arguments:

The cost/ value relationship is not justifiable.

The bus is flexible, it is easy to add buses and subsidize them, costing far less than rail.

Busses go to where the people are, throughout the island. (Flexible, not fixed. And serve more people.)

Many busses can be running during crunch time before 8 AM which will help people more.

Toll roads will cost far less, be self-supporting, AND relieve traffic as proven in Tampa.

The rail system will not help traffic congestion.

Hanneman is leading the city in to fiscal abyss. Homeowners BEWARE.

The federal money we hope to get will be nothing relative to the overall cost.

Fixed rail goes from point A to B and back, what about C, D, and E and so on?

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There will be low rider ship on rail as in other cities.
It is inconvenient, need too many transfers, total travel time far too long.
Honolulu is too small to afford this system.
The system will be outdated by the time it is completed.
15 years is too long to wait, other solutions would offer more immediate relief.
Any government run project is plagued with maintenance problems and the system will likely fall in to disrepair.
Dismal record of similar public works projects including calamitous cost over runs, misleading cost-benefit calculations, exaggerated development effects, overlooked and ignored environmental problems, and violation of established practices of good governance, transparency, and public participation in decision making.

City council members, are you paying attention to what your constituents want?

Everyone agrees traffic is a problem, but we want solutions, not government works projects that will not help the problem.
Why will you not at least do what Ann Kobayashi suggests and look at what appears to be a better system? This is starting to smell like a skunk, and you know what they say "if it smells like a skunk there probably is one". We need to find the skunk! (Follow the money.)
Speaking of smells, why did the city run an ad in the Advertiser on 8/22 asking people to protest the possible EPA requirement to add secondary treatment facilities at Sand Island for 1.2 billion dollars? It is OK for you to spend 5 billion of TAXPAYERS money on something that will not fix the traffic problem, yet ask people to protest spending 1.2 billion to fix the treatment facilities? I don't like you spending my money to run this ad!

You have now agreed to pay 86 million to PB Americas (formerly Parsons Brinckerhoff) for an environmental impact study for the train? I don't like you spending my money for this either.

Please, can someone explain to me what is going on at Honolulu Hale?

Nancy Nagamine
42 Namala Place
Kailua, HI 96734
808-263-7853

RECORD # 494 DETAILS

Status : Initial Action Needed
Creation Date : 2/4/2009
Creator Affiliation :
First Name : Dragan
Last Name : Kljajic
Business/Organization :
Address : 656 Pearson St. Apt. 604
Alternative Preference :
Apt./Suite No. :
City : Des Plaines
State : IL
Zip Code : 60016
Email : kljaja@email.com
Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 02/04/2009
Submission Content/Notes : Aloha kokua,
Please, reconsider implementing MAGLEV train and consult with
Japanese and German urban transit systems experts, if not too late!
Hawaii deserves the best, I'll be moving back within months.
Mahalo
Reply Requested : Yes
Submission Type : Draft EIS Comment
**FOIA (Freedom of
Information Request)
Request :**
FOIA Referral Date :
FOIA Response Date :

RECORD # 495 DETAILS

Status : Initial Action Needed
Creation Date : 2/5/2009
Creator Affiliation :
First Name : MJ
Last Name : Culvyhouse
Business/Organization :
Address : 46-318 Haiku Road
Alternative Preference :
Apt./Suite No. : 55
City : Kaneohe
State : HI
Zip Code : 96744
Email : culvyhouse@gmail.com
Telephone : 586-9293
Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 02/05/2009

Submission Content/Notes : February 5, 2009
Draft EIS on Honolulu Rail Transit
Commentary

Pardon me, but I have not seen enough "concrete," factual information provided to support building and maintaining an elevated rail transit system in Honolulu. Talk and promises are cheap, and the reality of this project would be devastating, not only aesthetically but financially, for us now and for our keiki's generations to come.

Even after reading the Draft EIS, too many questions remain unanswered; why is elevated rail necessary, where will the money come from, and where is the logic in touting our "second city" if we need to spend so many billions of dollars to get there? Rail would "provide accessibility to new development in the 'Ewa-Kapolei-Makakilo area in support of the City's policy to develop this as a 'second city,' ..."

Even the projected billions in costs is only a minimum estimate, the reality of the costs will be much higher.

As it is, our own Council on Revenues is lowering its projections every week, so how can we even venture to go ahead with this massive project with no end in sight of looming shortfalls?

Who leads these municipal projects, self-serving politicians and the construction industry? Until our leaders prove to us they are capable of maintaining their existing responsibilities and ongoing projects in our Honolulu and upgrade our infrastructure, we have no business committing money we do not have to start another ill-fated, short-term gain (construction jobs), long-term loss project.

Construction of elevated rail for Honolulu is insane for obvious reasons, at-grade light rail (LRT) is a compromise at best. I understand that AIA Honolulu has prepared a compelling, must-read, factual report supporting LRT, presenting glaring, substantial differences between the two systems in overall construction costs and time, operation and maintenance costs, visual, environmental and traffic impact, and comparable references to current systems in North America.

I am more inclined to trust the assessment of those who spend their own money and whose livelihoods depend on sound planning and critical thinking rather than the assessment of those who spend taxpayers money and whose livelihoods continue on whether their decisions are sound or not.

We must unite in enlightenment! Don't fall for this. Educate yourselves, think standing up, read the facts, do the math, and do not be afraid to challenge "those who go along unquestioningly with popular opinion, with potentially dangerous or fatal consequences."

MJ Culvyhouse
Kaneohe
247-5547eves
586-9293days

Reply Requested :
Submission Type :
**FOIA (Freedom of
Information Request)
Request :**

Yes
Draft EIS Comment

From: Dave Luehring [mailto:davelue@earthlink.net]
Sent: Wed 2/4/2009 4:10 PM
To: Matley, Ted <FTA>
Subject: Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Project

February 4, 2009

Mr. Ted Matley
Department of Transportation Services
Federal Transit Administration, Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

Dear Mr Matley:

Re: Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Project

The draft Environmental Impact Statement for the city's rail transit project is unacceptable because it is written solely for a steel wheel on steel rail system. There are other forms of fixed rail that may be better and more cost-effective than steel wheels on steel rails. Using other technologies, it may be possible to build the entire system for the same cost as steel-on-steel, thereby further mitigating the current environmental problems associated with lack of a mass transit system.

To build a system that costs more and delivers less, as would be the case with steel-on-steel, would adversely affect

Oahu quality of life for many years to come.

Please rewrite this EIS to cover the other technologies, such as monorail and maglev, to ensure that the city will obtain the best transit system at the best price.

Very truly yours,

Davidson Luehring
98-1230 Kulawai St.
Aiea, HI 96701-3065

From: Matt Lamon [mailto:matt.lamon@gmail.com]
Sent: Thursday, February 05, 2009 1:01 AM
To: wyoshioka@honolulu.gov; Matley, Ted <FTA>; governor.lingle@hawaii.gov
Cc: tapo@honolulu.gov; dmdelacruz@honolulu.gov; bmarshall@honolulu.gov; cdjou@honolulu.gov; dbainum@honolulu.gov; rtam@honolulu.gov; rcachola@honolulu.gov; gokino@honolulu.gov; ngarcia@honolulu.gov
Subject: Rail DEIS comments

Good Day Governor Lingle, Mr. Yoshioka, and Mr. Matley,

The following is my view of the most important shortcoming of the Draft Environmental Impact Statement (DEIS) for the proposed Light Rail in Honolulu.

The environmental impact statement fails to evaluate the *extended* adverse effects on traffic and normal function in Honolulu for the *extended* duration of rail system construction activity.

On page 3-45 of the DEIS the following statement is made in the first paragraph of section 3.5, referring to the timeline for completion of the rail system construction: "These effects would be temporary and would occur between 2009 and 2018...."

The current estimated rail construction duration for the rail system is unrealistic. Several years of

2/5/2009

litigation, protest, and technical delays need to be added to the construction duration estimate in order to make it accurate. The H-3 freeway was first proposed in the 1960's and completed well over 30 years later. The H-3 did not require condemnation of nearly as many residences and businesses (if any) as the rail project will. The rail project must anticipate a significant delay due to property rights litigation alone. The H-3 encountered protests, environmental litigation, cultural and archaeological sites, and technical delays, which the rail system construction timeline should also anticipate.

As such, the DEIS should be updated to reflect an *alternative timeline* for the construction of this project. The DEIS should anticipate an *extended period* of traffic delays and other construction related impacts due to construction accidents, failures, emergencies, and negligence, all of which occur normally on Oahu due to poor soil conditions, lack of expertise, inadequate planning and/or execution, and unexpected circumstances. Extensions to deadlines due to such issues during the construction process could add a number of years to the amount of time during which Honolulu will be forced to suffer construction-related impacts.

A realistic timeline is one that anticipates problems leading to an extension of the current construction phase timeline, which the DEIS does not reference with respect to a potentially *extended period* of disruption to the normal function of Honolulu. The DEIS must account for the fact that an *extended* construction period would (and likely will) significantly increase the impact of this project on Honolulu. In fact, the timeliness of the construction of this rail system is likely THE MOST IMPORTANT ISSUE for the majority of Oahu residents at this stage in the project. The fact that the potentially *extended* duration of construction is poorly addressed in the DEIS is indicative of a lack of understanding on behalf of the DEIS authors of the perspective and priorities of Oahu residents, and of the history of mega-projects in Hawaii. Oahu residents do not want to live with rail-construction-related traffic, dust, pollution, risk to life/property, unsightliness, and noise for the next 20-30 years while the rail is being built, repaired, demolished and rebuilt, protested, cordoned off, marched on, re-routed, stayed, and otherwise delayed. Therefore delays need to be anticipated and dealt with as soon as possible. Perhaps this comment will help that process begin.

Hoping for an ahead-of-schedule completion,

Matt Lamon
Honolulu, HI, 96817

2/5/2009

Dear Mr. Matley:

The draft Environmental Impact Statement for the City and County of Honolulu rail transit project is unacceptable because it is written solely for a steel wheel on steel rail system. There are other forms of fixed rail that may be better and more cost-effective than steel wheels. Please have the City rewrite this EIS to cover the other technologies, such as monorail and maglev, to ensure that our taxpayers will obtain the best transit system at the best price.

The so called "experts" who dismissed Maglev by stating: ("none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail.") are dooming the people of HAWAII to an inferior more expensive system. Allowed to compete and bid the MAGLEV would offer:

1. Less construction costs due to the concrete work being approximately 25% less and construction time would be sped up. The smaller guideway (21 feet versus 31 feet wide for steel) would result in a savings of over HALF A BILLION DOLLARS.

2. As shown in the DEIS O&M costs the MAGLEV also excels as there is nothing to wear out compared to steel. With the steel (YOE) dollars for O & M costs of \$133 Million/year, assuming a 25% savings; over 30 years the cost saving in O & M is approximately 1 BILLION DOLLARS!!!

3. The noise level for MAGLEV is also 3.5 times less (62 dba versus 80 DBA for steel), This would have less impact on the adjacent residents to the rail line and would preclude the need of additional costs for noise walls along the route. The steel system would have to be in compliance with the HRS. This would be an eyesore and would be a magnet for graffiti. With successful commercial operation in Nagoya Japan with no accidents which compare to the 6 steel accidents on the mainland in the past 8 months. Just yesterday (2/2/2009) 100 people were injured in the BART steel system on the mainland.

4. Safety is of utmost importance; due to the wrap around design there is no chance for derailment as opposed to steel. Steel would require drivers further adding to the costs to our taxpayers that are already paying the highest in the nation. MAGLEV would be completely automated. Finally the superior hill climbing ability of MAGLEV is vastly superior to steel. I WANT THE BEST RAIL SYSTEM FOR THIS SPECIAL PLACE WE CALL HAWAII. I JUST HOPE THAT YOU DO TOO!!! Thank you very much for your time.

Sincerely,
Richard Mori
94-742 Kaaka Street
Waipahu, Hawaii 96797

From: ernst [mailto:bternst@hawaii.rr.com]
Sent: Wed 2/4/2009 4:32 PM
To: wyoshioka@honolulu.gov; Matley, Ted <FTA>
Subject: Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Project

Dear Mr. Wayne Y. Yoshioka and Mr. Ted Matley:

I am concerned about the transit choice since it appears that "Steel wheels on steel rails" was selected by the Mayor before any meetings were held or any facts collected from each of the manufacturers of other systems.

There are other methods that are quieter and cheaper to build. A few, such as "Maglev" could be built and the savings used for additional miles of track and additional stations for the same overall cost of Steel Wheels on Steel Rails. We need a system that serves the University of Hawaii, the International Airport and communities all the way out to the West coast of Oahu. The system should be built as a single project, with all of the track and stations in one project, and it should be built as quickly as possible rather than a project that takes forever.

You should use monetary incentives in the contracts that reward construction companies for completing projects ahead of schedule.

Conversely, the same companies should be fined for exceeding projected completion dates on specific portions of the project. The construction of the Federal Prison at the Honolulu Airport is a wonderful example of how construction should proceed. It was built quickly and went into operation rapidly.

The draft Environmental Impact Statement for the city's rail transit project is unacceptable because it is written solely for a steel wheel on steel rail system. There are other forms of fixed rail that may be better, quieter and more cost-effective

than steel wheels. Please rewrite this EIS to cover the other technologies, such as monorail and maglev, to ensure that the city will obtain the best transit system and at the best price.

Sincerely,
William L. Ernst
Mililani, Hawaii

42 DS/TM



United States Department of the Interior

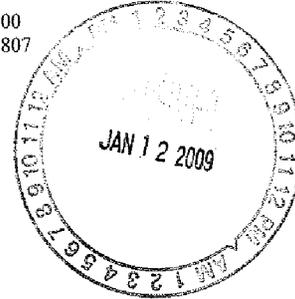


NATIONAL PARK SERVICE
Pacific West Region
1111 Jackson Street, Suite 700
Oakland, California 94607-4807

IN REPLY REFER TO:

A3615 (PWR-PA)

JAN 06 2009



Leslie Rogers
Regional Administrator
U. S. Department of Transportation
Federal Transit Administration
201 Mission Street
Suite 1650
San Francisco, CA 94105-1839

Dear Mr. Rogers:

Thank you for your recent letter notifying the Department of the Interior, National Park Service (NPS) of the City and County of Honolulu's Department of Transportation Services (DTS) consultation for a proposed 20-mile elevated guideway transit system on Oahu and your invitation to participate in this consultation per 36 C.F.R. § 800.10(c). The National Park Service accepts the invitation and looks forward to working with you and your staff.

Your letter also seeks our determination about prospects for a de minimus finding for the impact of the Honolulu High-Capacity Transit Corridor Project on the Pearl Harbor National Historical Landmark District (NHL). The NPS supports the concept of a transit system with a primary or alternate route that includes a station with convenient access to the USS Arizona Memorial (included with the recently designated WWII Valor in the Pacific National Monument) and will participate in the planning process as applicable. However, the proposed de minimus finding seems premature and the NPS cannot, at this time, concur with a de minimus finding due to the reasons described below. NPS will participate in the ongoing consultation process and will provide our determination once an assessment of effect for the Pearl Harbor NHL District, the Bowfin NHL, and the Valor in the Pacific National Monument have been completed and once we have conferred with the State Historic Preservation Office. The NPS also will provide formal comments on the Draft Environmental Impact Statement (DEIS) by the February 6 deadline.

Proposed Transit System Construction within the Pearl Harbor NHL. The boundary of the NHL proceeds along the Pearl Harbor side of Kamehameha Highway from Aloha Stadium to the opposite side of Radford Drive. Three station entrances (stops) to the transit system are proposed within that distance: Aloha Stadium Station, Arizona Memorial Station, and Pearl Harbor Naval Base Station. The DEIS only discusses impacts associated with the Pearl Harbor Naval Base Station (Table 4-32, Historic Properties within Project's Area of Potential Effect). The DEIS should analyze the potential impacts of the other two proposed station entrances within the Pearl Harbor National Historical Landmark before a de minimus



finding can be considered. For example, there would be a major impact at the proposed USS Arizona Memorial Station proposed to be located on an existing NPS parking lot. There is currently not enough parking at the site, so losing this parking space would have a major effect on NPS operations and visitation.

Visual Impact. A 30-40 foot tall elevated guideway transit system along Kamehameha Highway could cause significant negative impacts to the Pearl Harbor NHL view shed. The NPS recommends that a view shed analysis be completed for the proposed route before a de minimus finding can be considered.

Potential Impacts to Soundscape. The DEIS is not clear about the existing acoustic environment and what impacts to the soundscape of the Pearl Harbor NHL the proposed guideway rail system would generate. A soundscape analysis should be completed to determine impacts to the Pearl Harbor and USS Bowfin NHL's and the USS Arizona Memorial before a de minimus finding can be considered.

Potential Vibration Effects. The DEIS states that vibration levels should not exceed 65 VdB, which is below the 72 VdB allowed by the FTA around residential buildings. Analysis should be included for potential vibration effects on historic structures before a de minimus finding can be considered.

WWII Valor in the Pacific National Monument. The DEIS does not analyze the potential impact to the newly designated monument.

At this time, the NPS does not concur with a de minimus finding in regards to impacts of the Honolulu High-Capacity Transit Corridor Project on the Pearl Harbor NHL. The National Park Service looks forward to working with the conferees to develop the measures necessary to eliminate or mitigate adverse effects of the proposed transit project on the significant historic resources of the Pearl Harbor NHL District, the USS Bowfin NHL, and the WWII Valor in the Pacific National Monument.

Sincerely,

Patricia A. Neubacher

for Jonathan B. Jarvis
Regional Director, Pacific West Region

Comments to Honolulu Rail DEIS
Impact to Kakaako Mauka



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, HI 96813

Governor Linda Lingle
Executive Chambers
Hawaii State Capitol
Honolulu, Hawaii 96813

January 17, 2009

Dear Gentlemen and Governor Lingle,

Overview

Kakaako Mauka is home for a diverse group of construction services, wholesalers, fabricators, mechanics, retailers and single family residents. The DEIS, through the current rail alignment and TOD plans envision a vibrant mixed use urban environment. The alignment favors a route which will force the city to take 82 partial and 24 full land parcels. I'd like to submit the DEIS fails to recognize the current economic and social value Kakaako Mauka provides. It also fails to mitigate potential damage of displacing or interrupting the current business activity.

Economic Impacts

Businesses in Kakaako are in the area because of its unique location. Kakaako services the direct Honolulu Central Business district, Waikiki and surrounding Makiki, Manoa, residential areas. Any relocation effort to move these businesses outside of the Kakaako area would surely undermine the reason why they are in Kakaako. The DEIS does not address the impact of how displacement of these business will impact the surrounding loss of services these businesses provide. The DEIS also indicates it will give 90 days notice for a resident or business to relocate. This clearly is not enough time. Many of these businesses have specialized equipment and site requirements. Selection of a new site, negotiating with the new sites owner and making the move clearly can not be done within that amount of time. The DEIS does not address any specific mitigation measures.

Markettrends Pacific studied the Kakaako business contribution in 2007. It revealed Kakaako Mauka's non retail population employed roughly 17,000 people. This is about 4% of Honolulu's non-agriculture workers. Annual sales in 2006 were \$2.02 billion or about 6% and 4% of Honolulu's and the State's economy respectively. (Further information can be obtained from Market Trends Pacific 808-532-0733 or email: info@markettrendspacific.com) Displacement of Kakaako Mauka businesses would impact not only Kakaako businesses but also impact statewide economies.

Total / Partial Condemnation and Construction Impacts

The DEIS is vague on property acquisition mitigation solutions. The DEIS only says it will follow an outline provided by the Real Estate Acquisition Management Plan

To expand on the acquisition impact, the DEIS doesn't indicate if or how it would mitigate construction obstructions. Construction obstructions can take many forms. For example obstructions may include:

1. Location of support columns
 - a. They may sit in the center of a street but interfere with egress or ingress of a property
 - b. They may interfere with loading and unloading operations of a business
 - c. They may interfere with the visibility of a business from the street.
2. Noise
3. Construction detours
4. Road closures
5. Loss of street parking

The extent of these impacts may be determined by the length of time and how meaningful each impact is on a business. For some businesses, these impacts may be permanent. The DEIS offers no mitigation solutions.

Partial property condemnations may also greatly impact business viability. Per the Federal Real Estate Acquisition Plan, if partial condemnation impacts the economic viability of a property, the acquiring agency must offer the fair compensation for any remnant. If the City is required to acquire most of the 82 partially impacted properties, not to mention the hundreds outside of Kakaako, it brings to question the economic viability of the DEIS.

Kakaako businesses support Honolulu and the states economic base. These businesses are here now and are major contributors to Hawaii's economy and growth. The ripple effect of disruption to this base goes beyond any potential economic growth promised by IOD. The impacts go beyond the proposed alignment. Disruption to Kakaako will affect the state economy now and into the future.

Sincerely,



Gary Onishi
g_onishi@msn.com



U. S. General Services Administration
Public Buildings Service
PJKK Federal Building
300 Ala Moana Boulevard, Suite 1-336
Honolulu, Hawaii 96850
(808) 541-1950
Fax: (808) 541-3601



December 15, 2008

Wayne Yoshioka, Director
Department of Transportation
City and County of Honolulu
650 S. King Street, 3rd Floor
Honolulu, Hawaii 96813

Dear Mr. Yoshioka:

The purpose of this letter is to express our concerns over the proposed Honolulu High Capacity Transit Corridor Project.

The United States General Services Administration is the record owner of the Prince Jonah Kuhio Kalaniana'ole Federal Building and Courthouse located at 300 Ala Moana Boulevard ("PJKK Building"). We have never received any notice from the City and County of Honolulu Department of Transportation Services Rapid Transit Division (DOT) about this project. As such, we were surprised to learn that the proposed project entails the construction and operation of an elevated transit system along a narrow street directly abutting the PJKK Building on Halekawila Street. As a federal agency and property owner significantly impacted by the proposed project, DOT is required to invite us to participate in the scoping process which appears to have occurred in late Dec 2005 and January 2006. Nor have we received any of the multiple notices of intent issued for this project and the draft Environmental Impact Statement. See List of Draft EIS recipients attached to the Draft EIS.

We hope that this project has not proceeded so far that any possibility of our providing meaningful comment at this time has been eliminated. Our obvious concerns include noise, vibration, security and apparent site easement. We are hereby requesting an immediate meeting with DOT in order that we may be briefed as to the proposed project and its particular impact upon the PJKK Building. We would caution DOT not to proceed on the basis that that any property necessary for this project (including air rights) along Halekawila can be obtained through the eminent domain process since this process is not available against the United States.

We trust that DOT will immediately correct its notice procedures and now include us on the mailing list for this project and provide all documents prepared and invitations of public meetings for the proposed project to the United States of America. Please note that all information should be sent to the PJKK Building as follows:

Michael D. Larson, Property Manager
Public Buildings Service
US General Services Administration
Prince Kuhio Federal Building & US Courthouse
300 Ala Moana Blvd., Suite 1-336
Honolulu, HI 96850-4992
(808) 541-3632
michael.larson@gsa.gov

We look forward to hearing from you at your earliest convenience. Thank you.

Sincerely,



Michael D. Larson
Property Manager

cc: Carrie Okinaga, Corporation Counsel
Faith Miyamoto, Chief of Transportation Planning
Leslie T. Rogers, Regional Administrator

HONOLULU COMMON SENSE TRANSIT
REV. & MRS. SAMUEL M. SMITH & FAMILY
P. O. Box 1015
KAILUA, HI 96734-1015 U. S. A.
(808) 230-8683 PHONE OR FAX

RECEIVED

2008 DEC -8 A 9 26

CITY COUNCIL
HONOLULU, HAWAII

December 5, 2008

City Councilman Charles D'Jou
Honolulu Hale
530 S. King St.
Honolulu, HI 96813
Honolulu, Hawaii 96813.

Dear Councilman D'Jou:

I watched your comments on the rail system start point being more sensible from downtown outward and if they insist on the DUMB elevated system, you are completely right. More from the standpoint of traffic being heaviest in the downtown and outward area and daily getting worse on average, though than from having it available for use because until a certain length of trackage is in place there is no real value to putting trains on the track and running them.

But, since you have public exposure, maybe I can show you the common sense that the entire system should be underground. I have between 20 and 25 good, strong, valid reasons why it **MUST** be built entirely or almost entirely **UNDERGROUND**.

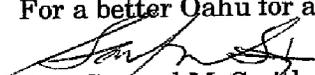
I am too busy to take the time at the moment to separate and reorganize the letters with the facts into a more concise form, but if you will read the reasons that follow and which I have already been pushing for since 1983, you will see that a great deal of both time and money can be saved and a much better, more safe and secure system achieved. Please note on the envelope and on my web page the Washington DC underground rail system.

Before you begin to make excuses why **UNDERGROUND** won't work for Honolulu, be aware that I answer **EVERY** objection to underground and show they are based on misinformation. A totally Modern Marvel technology which has already been used and for which the equipment is available, would begin at the outer ends and work toward the middle **BENEATH** existing City and State rights of way and could be actively working 50 or so feet below the busiest freeway at the busiest hour without traffic above having any idea what was below them.

It will be to your own benefit and the benefit of every resident of Oahu who commutes frequently, whether from Windward or Leeward, because traffic congestion costs everyone on the island time, fuel and wages, to say nothing of time at home with families or just "kicking back."

Plain common sense will tell you what I am pointing out is correct and the only sensible way to really solve the problem.

For a better Oahu for all of us,


Rev. Samuel M. Smith

AR00057488

Rev. & Mrs. Samuel M. Smith and Family
P. O. Box 1015
Kailua, HI 96734-1015
808-230-8683 or cel 351-2753

November 27, 2008

URGENT URGENT URGENT

Mayor Mufi Hannemann
Honolulu Hale
530 S. King St.
Honolulu, HI 96813

Dear Mayor Hannemann:

This is to certify to you that **EMINENT DOMAIN SUITS ARE UNNECESSARY, A MAJOR WASTE OF TIME AND TAXPAYER MONEY.**

I SHALL volunteer to assist every homeowner and business affected by the proposed EMINENT DOMAIN to provide right-of-way for your elevated rail system and to testify in court to STOP plans for such an elevated system.

You know that I have been urging MASS TRANSIT NOW since 1983 and did all I could to help influence voters to vote FOR the steel-on-steel rail system. **Now, I will work TWICE AS HARD to get you, Mayor Mufi, and City Council to reconsider the ONLY LOGICAL AND COMMON SENSE SYSTEM for the 21st Century — 100 % UNDERGROUND steel on steel RAIL.** I will also be bringing pressure to bear from the State Legislature and from Washington. I have already contacted Senator Inouye who, I am sure doubtless voted for funding for the Washington DC UNDERGROUND metro system, and I am urging him to tie Federal funding to UNDERGROUND construction similar to that of the Chunnel. (Please visit <http://www.affordableworldtravelandtours.com/honolulucommmonsensetransit/honolulucommmonsensetransit.html>.)

I am told, the State of Hawaii may already have used such equipment as was used in the *Chunnel* in building the H-3 tunnels and may still own it.

In past correspondence, I have already given you well over 20 SOLID, Valid reasons why UNDERGROUND will be less expensive and because only Environmental Impact studies/statements, which would need little modification from your already existing one, and the signing of right-of-way agreements with the State and construction contractors, construction could begin even by the end of this December. If you insist on present elevated routing, Eminent Domain lawsuits and related court injunctions can delay even the signing of contracts for at least many months and possibly several years. This, of course, will cost hundreds of thousands of dollars in additional costs between attorney fees and increased land value, to say nothing of the cost to commuters who will have yet a longer wait for significant traffic congestion relief.

Every argument AGAINST UNDERGROUND RAIL can easily be answered by citing the many instances in which mass transit and even major rail tunnels are beneath the water table, in more earthquake prone zones than Oahu, bored through even granite rock (which is MUCH harder than lava!) as well as through clay and softer rock.

The technology of a huge machine like bored the *Chunnel* makes arguments about the construction

2

problems of the local sewer system, which uses surface construction methods and is relatively shallow totally nonsense. Likewise, reference to the "Big Dig" fiasco in Boston, where surface dig and refill methods were used is not an option. At the VERY BUSIEST TRAFFIC HOUR, the *Chunnel*-type boring/tunnel building equipment could be boring 40 or 50 feet below the highway or street and nobody would even know that their stop and go surface traffic was immediately above the actively boring equipment.

I do agree that although your proposed elevated rail system doesn't look too bad as an eyesore, and would certainly get people from Point A to Point B far faster and cheaper than by their own cars, even factoring in the taxes to build the system. I would love to show you my copy of the History Channel's Modern Marvels: *The Chunnel* [<http://store.aetv.com/html/product/index.jhtml?id=42739>] DVD so you can see for yourself how practical the underground system would be.

I will not here take the time to revisit the many reasons **for UNDERGROUND AS AGAINST ELEVATED OR SURFACE, NOR THE REASONS WE URGENTLY NEED MASS TRANSIT NOW.** I am leaving most of those reasons as previously mailed to you below. I will also be mailing copies of this letter to you to all possible news media in an effort to raise public consciousness of how many delays and how much additional costs the elevated or surface routing would cause and the total practicality of building entirely underground, as well as several safety factors in which UNDERGROUND is safer.

For a better Honolulu for everyone,

Samuel M. Smith

June 15, 2008 letter is below and includes most of October 25, 2006 letter.

On October 25, 2006, I wrote the below letter to you and you responded and even sent me and my family a Thanksgiving greeting. You also had the Transit Study people send me a great and well-done DVD about the urgency of the need for Mass Transit ASAP. I therefore invested in a copy of the History Channel's Modern Marvels: *The Chunnel* [<http://store.aetv.com/html/product/index.jhtml?id=42739>] DVD which I had intended to get into the hands of then Transportation Chair Nestor Garcia, but somehow never seemed to be able to get it to him.

However, I would rather fight AGAINST the above ground rail than see the city make that major mistake. I HAVE SIGNED THE STOP RAIL NOW petition BUT I WILL DO ALL I CAN TO GET a YES vote to BUILD an UNDERGROUND rail system.

And I call your attention to the MAJOR money being spent by someone to advertise AGAINST ANY rail and ask WHO WOULD SPEND THAT KIND OF MONEY TO STOP RAIL? Now who will benefit from stopping Rail? Petroleum interests, Automobile dealers, Parking lot operators, Garage Mechanics. Now Insurance companies will of course seem neutral in the matter, but because higher accident rates will justify higher premiums, they might also benefit by stopping rail.

Please look at the advantages I have already listed in my October 25, 2006 letter below and factor in one more thing that I had not thought about before. IF A 100 PERCENT UNDERGROUND SYSTEM WERE TO BE BUILT THERE WOULD BE MANY THOUSANDS OF CUBIC YARDS OF FILL TO SAFELY EXTEND THE SHORELINE IN A PLANNED LOCATION AND THAT LAND COULD THEN BE SOLD AS WATERFRONT PROPERTY TO OFFSET MUCH OF THE COST OF BUILDING THE RAIL SYSTEM.

And again, in June 2008, I remind you that the construction tie-ups of an above ground system would make present traffic tie-ups look like nothing.

I also remind you of land acquisition costs if you do not build beneath existing roadways using EXISTING equipment that can operate there with NO DISRUPTION of the traffic above. You will have costly and divisive *eminent domain* suits to file for above ground rights of way, court delays and again, who will benefit? Petroleum interests, Automobile dealers, Parking lot operators, so of course they

are willing to spend BIG MONEY to stop rail and if YOU, Mayor, do not use my arguments linked to those showing the necessity of Mass Transit that were on the DVD you had the Transit Study people send me, the MISINFORMATION people will both get the issue on the Ballot, but will also get rail voted down. What a tragedy for EVERYONE!

Please, Mayor, I beg of you, reconsider and reevaluate 100 percent UNDERGROUND steel on steel rail. If you persist in the above ground FOOLISHNESS, I will SADLY be adding my voice to the ANTI Rail voices. I believe that at the rate it is now going, the petition will get more than enough signatures to get the issue on the ballot and with the misinformation already being promoted, it will lose. **Who is paying the "volunteers" to stand outside Post Offices and other public places with petitions?** I believe it is the Petroleum interests, Automobile dealers, Parking lot operators, etc.

Sincerely,

Rev. Samuel M. Smith

October letter follows:

On the 8:00 AM news on KHON TV2, a member of the Kakaako Neighborhood Board correctly and wisely spoke to the issue of the horrendous traffic tie-ups on Kapiolani Boulevard as a result of sewer work and lane closures. I wonder that neither you nor others involved in planning the URGENTLY NEEDED Mass Transit System have glibly overlooked this aspect of building an above ground metro system. Equipment is already in storage that has been tested and very successfully used to build the "Chunnel" between England and France and the BART in California's San Francisco Bay Area. The BART in particular has also already been tested by earthquake, so the evidence is clear that above ground Metro proponents' argument about water, rock and earthquake hazards to the underground system is a smokescreen.

I have previously contacted you on this subject and gave 17 good, valid, common-sense reasons for MASS TRANSIT NOW. If I repeat a few from this new angle please forgive me. (I would welcome a face-to-face debate on the issue before City Council and the media.)

While I URGENTLY support Mass Transit, I equally or with even greater emphasis OPPOSE an above ground system for the following reasons in order of importance:

1. MASSIVE traffic tie-ups during construction that are unavoidable for this type of construction.
2. Delays caused by battles over *eminent domain* rights and causes to acquire the necessary rights-of-way.
3. Cost of right of way acquisition.
4. The already protested blockage of portions of Oahu scenery by the additional structures.

Benefits of the UNDERGROUND system are:

1. Construction machinery is available capable of boring the tunnels, creating a steel-reinforced concrete tunnel tube with **NO DISRUPTION OF SURFACE TRAFFIC** or buildings above. Spoil dirt is hauled out at the ends and concrete, steel and other materials needed by the machine are hauled in from the ends.
2. AND 3. **No long court battles over *Eminent Domain* rights** because virtually all needed right of way already exists beneath present highways, streets and roads. Only terminals or stations might require acquisition of land. Costs for hiring professional tunnel builders and their machinery easily offset by **LACK OF LAND ACQUISITION COST.**
4. No permanent above ground structures obstructing tourist (or our) view of our Native Oahu beauty.

4.
Please do not overlook the URGENT need folks in the entire Leeward area have for MASS TRANSIT NOW!!! But at the same time, please don't overlook the awful gridlock of traffic that building an above ground system will unavoidably create. As I have pointed out before, EVERY taxpayer in Leeward Oahu has ALREADY paid FAR more in fuel costs, lost time and vehicle repair and vehicle replacement than the relatively small proposed tax increase that would have already had Mass Transit in place if misguided voters had not rejected the option several years ago.

Finally, our State and Oahu leaders are coming close to an agreement that we really DO need MASS TRANSIT NOW. The widening of existing highways and addition of zipper lanes is almost counter productive as more land is gobbled and the fuel consumption and lost time situation is only slightly affected. What about the High Speed Ferry proposal to zoom people from Barbers Point or wherever else in that area that such a landing is decided upon. That is still subject to closing if storm conditions arise, making an even more problematic situation for Leeward residents on such days as people planning to use the ferry suddenly discover at the last minute that they will either have to drive, call a cab or catch a bus. This, I think, is something those pushing for the ferry boat idea seem to forget.

And if a Disneyland style monorail is built, consideration must be given to the disruption of traffic during the construction phase. This, in addition to the fact that it cannot help but at least partially block scenic views. And, since the VAST majority of those most urgently needing MASS TRANSIT NOW are residents needing to get to work on time, they have seen the sights and simply want to leave home as late as possible to arrive at work on time and return home or whatever else they must do with the least lost time commuting from their workplace to home, the UNDERGROUND rail system makes the MOST SENSE. With modern technology, tunnel boring machines such as built the England to France Chunnel and other similar equipment now in storage awaiting a time and place to be used again can easily build earthquake resistant and waterproof systems with only minimal surface support, minimal traffic disruption, no need for additional land, since they can be built beneath existing freeways and other rights-of-way.

For any who question the practicality of and the advantages to the UNDERGROUND mass transit systems for the unique conditions and needs of Oahu and Honolulu, I suggest you secure copies of the titles, Modern Marvels: **Tunnels** [<http://store.aetv.com/html/product/index.jhtml?id=122111>] or Modern Marvels: **The Chunnel** [<http://store.aetv.com/html/product/index.jhtml?id=42739>] and Modern Marvels: **The City Beneath Our Feet** [<http://store.aetv.com/html/product/index.jhtml?id=42738>]. These in order of their significance to Honolulu. Or, I can loan you my copy.

I would welcome a face-to-face debate on the issue before City Council and the media.

Rev. Samuel M. Smith
copy to All News Media,

RECEIVED
12/5/08

2008 DEC -8 P 2:59

CITY COUNCIL
HONOLULU, HAWAII

Dear Councilman Dijon:

J. Applaud your brave stance by openly stating an obvious thing of the rail in town outworn make more common sense than the Engineering Co. plan.

As a Waipahu resident its very obvious to us that going from Waipahu to Kapolei does not solve the problem of going to town.

The bus system could move to Kapolei since they use roads. The bus barn ^{can} ~~and~~ be used as the train yard for rail cars. The bus barn is Halawa or wherever it is in Aiea - Pearl city area.

We shouldn't hold our breaths, no common sense decisions are ever made in Hawaii government.*
sry it as an retired state worker.

Aloha

Alex

* maybe no common sense decision
is ever made by any government?

Matsuda, Sylvia

From: Djou, Charles
Sent: Tuesday, December 09, 2008 9:47 AM
To: Matsuda, Sylvia
Subject: FW: RAIL PHASING

Please add to DEIS comments.

Charles K. Djou
Councilmember, District IV (Waikiki, East Honolulu)
Honolulu City Council
530 South King Street, Suite 202
Honolulu, Hawaii 96813
Phone: (808) 768-5004
Fax: (808) 550-6689
Email: cdjou@honolulu.gov
Web: www.honolulu.gov/council/d4

From: Steve Timpson [<mailto:stimpson@hawaii.rr.com>]
Sent: Monday, December 08, 2008 11:43 AM
To: Djou, Charles
Subject: RAIL PHASING

Charles,

Thank you for looking into the logic of the currently announced phasing of the rail. The only logic supporting constructing the first phase of the rail in the country is to make available jobs sooner than would be if work starts in town. Think of it as to who would be using a system that starts in Ewa and ends in Aiea? People are not going to drive to Ewa, leave their cars there, ride the rail to Aiea, and then take some other means to travel into town, which will mean that the ridership counts will be way down, which then fuels the fire from people not favoring rapid transit about stopping future phases since nobody is using the system. San Francisco, and all the other cities that have built rapid transit systems all sequence the phasing to start in town and then extend the system into the suburbs as use increases. All these locations have done so even though the downtown section is more difficult and costly.

Please continue to pursue the re-phasing as it just does not make any sense.

Thanks

Steve Timpson
Goto Construction
216-9525

Matsuda, Sylvia

From: Djou, Charles
Sent: Tuesday, December 09, 2008 9:41 AM
To: Matsuda, Sylvia
Subject: FW: Honolulu Transit

Please submit as comments to the DEIS for me

Charles K. Djou
Councilmember, District IV (Waikiki, East Honolulu)
Honolulu City Council
530 South King Street, Suite 202
Honolulu, Hawaii 96813
Phone: (808) 768-5004
Fax: (808) 550-6689
Email: cdjou@honolulu.gov
Web: www.honolulu.gov/council/d4

From: Richard Kamis [<mailto:kamii@hawaii.rr.com>]
Sent: Monday, December 08, 2008 3:11 PM
To: tapou@honolulu.gov; Delacruz, David A; Marshall, Barbara; Kobayashi, Ann H.; Tam, Rod; Okino, Gary; Garcia, Nestor
Cc: Djou, Charles
Subject: Honolulu Transit

We respectfully request your consideration of Charles Djou's recommendation to begin construction of the transit system at the East end of the proposed route working toward the west end

If monies should fail and the project be halted, a portion at the East end should be useable whereas a portion only at the West end is not likely to be particularly useful

Additionally, we truly hope that you seriously believe that monies will be available for this project. We have serious question regarding this, considering inevitable overruns and the **disastrous "Boston Big Dig"** history of the company that Honolulu apparently plans to use. Reports surely indicate that Boston is in **major** financial trouble as a result!

Richard P. Kamis
Kalakaua Avenue
Honolulu

4350 Halupa Street
Honolulu, Hawaii 96818
January 6, 2009

Mr Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu, HI 96813

Dear Mr Yoshioka:

Regarding the heavy rail DEIS report; does it adequately address the issue of rail's visual impact on our environment and the affect it will have on our city's number one industry, tourism? Changing our image from an island paradise into one contaminated by urban blight, noise, and fumes will surely have unacknowledged consequences on tourism, and nowhere in your report are they addressed.

My sister-in-law who lives just South of Chicago was aghast with the proposed project. She said tourists came to our beautiful island to get away from the fumes and noise of the big city. She asked me, "Why would they destroy paradise?" Why, indeed?

Obscuring Aloha Tower, the shoreline and mountain views will forever change Oahu's unique "Sense of Place?" The report slides over the issue by stating, "Mitigation issues would focus on preserving visual resources and enhancing the project design to comply with applicable policies. The following measures would be included to minimize visual affects and enhance the visual and aesthetic opportunities it creates." Can the nebulous suggested measures, such as trees and lighting, truly preserve our visual resources?

In a Star-Bulletin 12/14/08 letter to the editor the writer discussed his experience with a steel-on-steel rail system in Sydney, Australia, and it was not positive. He wrote of "car walls marred with graffiti and windows etched with the same ... sides of the tracks were littered and the squealing of the rails was irritating." What impact will the day-in day-out monotony of squealing wheel noise have on school children at schools and homeowners who live along the route?

Besides the onerous impact of heavy rail on the Island's visual environment, other issues require clarification. Why were other cheaper more environmentally friendly options not *seriously* considered? How can the expenditure of billions of dollars be justified for only a 1% improvement in traffic congestion? Why has the UH West Oahu campus not been a priority when it is evident that traffic congestion is mitigated when UH Manoa is not in session? What emergency procedures will be in place during another Island wide blackout? How would passengers be rescued? Why should the public trust steel wheels on steel rail would not rust in our salt laden air when Aloha Stadium exemplifies the opposite?

Does the Federal Transportation Administration know the electorate was swayed into passing (barely) a Charter amendment for rail because the City and County of Honolulu unethically spent over \$3 million of taxpayer funds promoting it? Do they

know the City unequivocally assured voters nearly one billion dollars from the FTA was promised without such evidence in writing? Is the FTA aware that politics caused a logical Airport, Shipyard, Pearl Harbor, and Hickam route to be bypassed in favor of the illogical Salt Lake Blvd route?

One can only hope that City leaders and other locals with a financial stake in the outcome will step back and take another look at the impact this massive project will have on our beautiful Island home and ask themselves, "In the end, will we be happy and proud of our legacy?"

Sincerely,

Janice Pechauer

Cc: Governor Linda Lingle
City Council Members
Mr Ted Matley, FTA Region IX

RECORD # 510 DETAILS

Status : Initial Action Needed
Creation Date : 2/5/2009
Creator Affiliation :
First Name : James
Last Name : Tokishi
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Alternative Preference :
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Telephone :
Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 02/05/2009
Submission Content/Notes : My concern regarding the DEIS is that there is no updated revenue information. In 2006, the economy was strong, and Parsons Brinckerhoff used three numbers, a "conservative" estimate, and two fifteen-year projections using information from the Hawaii Council on Revenues, despite the CoR only making predictions for a few years in the future.

In the two years (2007, 2008) following the release of the Alternatives Analysis, the 0.5% GET transit tax has not met even the lowest revenue forecasts, shown in table 5-4 in the AA. Despite this, the DEIS uses the middle forecast to estimate the total revenue available to the rail project.

Even in 2007, before the economic downturn of 2008, revenues were far below their predicted values. It seems clear both that the original estimates were far too optimistic, and that the projections need to be reevaluated due to the current economic climate.

Reply Requested : Yes
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 511 DETAILS

Status : Initial Action Needed
Creation Date : 2/5/2009
Creator Affiliation :
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Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 02/05/2009
Submission Content/Notes : The airport route is the one that needs to be built. The number of bus routes in the airport vicinity already justifies the greater number of potential riders than Salt Lake and Pearl Harbor should be served also. Ideally the route should proceed into Waikiki to eliminate the need for taxis, shuttle vans and buses to that destination. Many Asian visitors are users of similar systems so it would be a comfortable, familiar mode. Since a goal was to serve the university population, I wonder of the possibility / feasibility / cost concerns of the route continuing through Waikiki across the Ala Wai and to the university as opposed to a spur to both? I understand the need for equipment service yards to be located to the west but please build this service as quickly as possible, preferably from Ala Moana out. Let the park & rides and bus transfers work to keep cars from the congested downtown / Ala Moana areas.
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 512 DETAILS

Status : Initial Action Needed
Creation Date : 2/6/2009
Creator Affiliation :
First Name : Janet
Last Name : Gillmar
Business/Organization : Campus Planning Office, U. of Hawaii, Manoa
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Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 02/06/2009

Submission Content/Notes : To: Department of Transportation Services
From: Janet Gillmar/ ASLA/
Campus Planning Office/ U. of Hawaii
Date: February 6, 2009

Comments on the Rail Transit DEIS:

1. Alternate plans anticipating possible lower population and tourism levels

Two major new factors that could affect future population levels on Oahu because of a potential shrinkage of a mainstay of our economy, tourism, have arisen in the past year or two, global warming and economic turmoil. "The tectonic plates have moved". Given that our situation has changed since rail transit plans were begun, we need to review the plans in this light, make adjustments and proactively anticipate possible further adjustment in subsequent phases.

The first one of the new factors is recognition of the seriousness of global warming and the effect human activity has on it. The exponential increase in long distance global tourism that we have seen in the past 50 years may roll back in response to restrictions on air travel due to global warming. Of course, it could be that new passenger ships that use sails plus auxiliary engines, maybe solar powered, could allow the maintenance of current air travel volume to Hawaii. But we cannot make reliable projections here and need to be prepared for different scenarios.

The second new factor is the current global financial turmoil which includes volatile oil prices and reduced wealth in our traditional sources of visitors. Of course, there is the potential that rising incomes in Asia, in particular in China, will offset lower North American family travel budgets. Perhaps Hawaii will succeed in substantially increasing its presence in high technology sectors, significantly expand agricultural production, or find another way to support our current or higher levels of resident population. But, again, we cannot make reliable projections so need to be prepared to move in alternative ways.

The result could well be that our population will either not grow any more or would even shrink. Just one effect of this possibility is that rail transit planning should not continue to assume that it is politically impossible for any portion of the existing road lanes to be occupied by a rail line on the surface. Putting the transit line on the surface through the Chinatown-Downtown- State Capitol Special District, for instance, would make a major difference with respect to concerns about the negative visual impact of an elevated rail line through this central and historical part of our city, which has been carefully protected by City ordinances for many years.

2. Salt Lake versus airport route

It would seem that adding a spur to the airport from a main line through Salt Lake, or a spur to Salt Lake from the airport, should be feasible and would add immensely more value to the transit system with relatively

little added construction cost or operational problems. This is a feature in many other rail transit systems. There could be "A" trains to the airport, or Salt Lake, and "B" trains to Kapolei from central Honolulu and vice versa from Kapolei to Honolulu.

3. Visual and cultural impact on Special Districts

An elevated rail line should not run through Chinatown-Downtown-the State Capitol Special District not only because of the special district status for 2 of those places but specifically because of the severe visual impact on the mauka-makai views that are part of the special district ordinances as well as the adjacent urban environment. The logical and traditional Hawaiian way of orienting oneself on islands is by reference to the radius of a circle, via mauka-makai views, and along the circle, via Ewa and Diamond for central Honolulu. Impeding or degrading those views would have a serious impact on important historic buildings and landscapes and a Hawaiian sense of place that everyone, including our economically important visitors, would sense and react to negatively.

4. Conceptual and detailed design

How well the conceptual and detailed design of all parts of the system is done, especially the elevated portions of the system and the stations, will significantly affect community acceptance. In general, all elements should be as visually unobtrusive as possible.

a. To do that, stations need to be individually designed. The landscape architect should be an equal partner from the beginning of the design process. The architectural design for each structure as a whole should be low-profile, not heroic or iconic. Each structure should be sensitively attuned to its urban and/or scenic landscape context, the architectural character of adjacent buildings and very well designed in its construction and details.

b. The structure for elevated portions of the system should be a thread of unobtrusively elegant sculpture that varies in color and form, chameleon-like, according to its context.

5. Impact on existing road lanes, sidewalk and planting space

Where an elevated structure is inserted in an existing road right of way corridor, what happens to the sidewalk and tree planting space if existing road travel lane capacity is to be maintained?

6. Impact on ability to provide future bicycle lanes

Interest in providing for more and safer bicycle travel via designated bicycle lanes has increased. If some of the right of way space is taken for the piers supporting an elevated rail line, how can bicycles be accommodated?

Reply Requested :

Yes

Submission Type :

Draft EIS Comment

RECORD # 513 DETAILS

Status : Initial Action Needed
Creation Date : 2/6/2009
Creator Affiliation :
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Telephone : 510-261-8313
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 02/06/2009

Submission Content/Notes : To Whom It May Concern:

My concerns for the transit project are not so much with the rail itself, but rather the effects the rail will have on mixed-income development in its surrounding areas.

It is my understanding that government officials are looking to Hope VI projects to model our own mixed income redevelopment. In places like Oakland, Seattle, and across the country, this mixed income redevelopment has been paired with transit rail development. In Oakland for example, every station stop has become a site for mixed income redevelopment.

This has impacted low income residents in nearby areas tremendously. Oakland Coliseum's mixed income development displaced 178 families, and only 4 families returned. This is consistent with Hope VI national statistics.

So I'd like to know what steps are being taken by the transit project to insure that this doesn't become the case on Oahu, especially in high-density areas like Kalihi-Palama. I urge you to consider these solutions:

1. Remove barriers for low-income residents to return to housing near the rail redevelopments
2. Ban no-fault evictions and criminal history disqualifications in areas near the rail
3. Ensure that the timing of the rail is not disruptive to existing residents
4. Ensure case management and social services attached to relocation counseling
5. Guarantee no net loss of affordable housing units in areas near the rail
6. Maintain rental affordability at current levels in areas near the rail
7. Ensure family and culturally appropriate amenities in all redevelopments connected to the rail

Reply Requested :

Yes

Submission Type :

Draft EIS Comment

FOIA (Freedom of Information Request) Request :

FOIA Referral Date :

FOIA Response Date :

RECORD # 515 DETAILS

Status : Initial Action Needed
Creation Date : 2/6/2009
Creator Affiliation :
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Last Name : del rio
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Apt./Suite No. : 212
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Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 02/06/2009

Submission Content/Notes : Comments re: Draft EIS Honolulu High Capacity Corridor Project

Flawed selection and alternative process: Public not consulted in the development of route alternatives or type of plan. Toll lanes could accommodate bus, taxi, tour bus, handicap vans, emergency vehicles, and enforcement, and be utilized 24 hours a day instead of mostly peak hours. The toll alternative would be viable only if multipurpose and flowed to university, and Waikiki, and tie into the windward, and eastward traffic. Alternatives to split ewa and central traffic flows, and to facilitate Pali, Like Like, and H1 east have not developed or pursued.

Existing and future transit populations neglected. The Dillingham and Kakaako route flow through low population light industrial in Kalihi, and future middle to high income residential in the urban core kakaako. A Waipahu, pearl city, pearl ridge, Salt lake boulevard, king street, olomea, vineyard, punchbowl, king, to university route, with spurs to the airport, Waikiki by university avenue or kalakaua with connection to Ala moana and the convention center would serve the highest existing and future low and moderate income residential, and tourist populations. A king vineyard route, weather multipurpose or single use, ties in fluidly with windward and eastward traffic, reaches the legislature, city council, courts, state and county services, provides healthcare alternatives at Straub, Kuakini, Queens, and Kaiser hospitals, offers greater access to university and college resources, access to entertainment venues like blaisdell has the most development potential along streets with ample room for additional private and public transportation, possesses existing excess capacity and right of ways, is the most direct route, and would bring tourist directly to the capital, historic, and arts district.

Rail oriented cities developed around historic freight and passenger rail with links to intercity and interstate rail lines. A king street orientation could be an inner city backbone and effectively facilitate inner city passengers within and to the urban core. Intercity extensions to central or ewa and leeward could be secondary. The most congested area is from Pearl City to University, the primary urban core. Park and ride at Pearl city juncture could aid feeder buses to a multi purpose toll, bus, or rail.

Major populations excluded. No plan considers the future and existing population in Central Oahu (planned for thousands of residences), or the isolated low to moderate income public transit intensive Leeward coast. The Kapolei portion is inferior to a King, university route where multifamily low to middle income populations already reside and are bordered by high density underutilized residential and mixed use zoned real estate. Future middle to high income single family suburban communities in Central and Ewa plains will be two to three car households as they mature, and are not typical public transit intensive communities. Windward, and eastward traffic is completely ignored. Kapolei route may provide developers the infrastructure for rapid urbanization of the ewa plain.

Full utilization of rail capacity will not likely be achieved with projected population of 1.13 million by 2035, a maximum honolulu population of

1.5m or 2m at most, and projected populations far below comparable rail oriented cities. Riders will at first be intercity displaced bus riders, with the remaining rider predictions questionable. Inner city transport will not be served by the current choice. The cost of an additional transit authority has not been determined. The city is unable to maintain its existing infrastructure. Higher subsidies and fees for the bus and the rail seem likely. A multipurpose elevated toll, bus, or rail could generate additional revenue and provide flexibility.

Lack of coordination between city and state to resolve congestion. insufficient plan to accommodate existing automobiles and additional 100,000 or more cars by 2035, and county failure to utilize existing capacity and to complete arterial lane improvements, are the most pressing quality of life and productivity issues facing the island of oahu.

Federal funds should be devoted to the highest volume transit projects, and possibly ones that have sought and obtained private investors. Projects that accelerate urban sprawl and exacerbate traffic congestion need to be discouraged. Intercity routes to outlying, isolated, existing populations, inner city backbones, or connecting intercity lines ought to be considered separately, with inner city lines as a priority.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Yes
Draft EIS Comment

RECORD # 516 DETAILS

Status : Initial Action Needed
Creation Date : 2/6/2009
Creator Affiliation :
First Name : Chris
Last Name : Da
Business/Organization : American Society of Landscape Architects
Address : Box 246
Alternative Preference :
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Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 02/06/2009

Submission Content/Notes : February 6, 2009

Mr. Wayne Yoshioka, Director
DEPARTMENT OF TRANSPORTATION SERVICES
650 S. King Street 3rd Floor
Honolulu, Hawaii 96813

Dear Mr. Yoshioka;

Subject: Honolulu Rail Transit Draft Environmental Impact Statement
Comments

I am writing this letter to provide comments on the Honolulu Rail Transit Draft Environmental Impact Statement on behalf of the Hawaii Chapter of the American Society of Landscape Architects.

The Honolulu rail transit presents many opportunities to improve the quality of life of Honolulu's residents and visitors. Through smart sustainable growth, light rail could create new long term economic opportunities, revitalize the sense of place of Honolulu's main streets and communities, protect environmental resources, and improve human health and quality of life.

The rail route is located on the main streets of several distinct Oahu communities: Waipahu, Aiea, Pearl City, Salt Lake City, downtown Honolulu and Kalihi. Seize this opportunity to build a rail system that reflects Hawaii's rich sense of place and helps build more vibrant communities. Promote smart development by rezoning areas near rail stations with higher density, abundant pedestrian and bicycling facilities, street trees and reducing automobile parking spaces.

Employ a sustainable design and construction approach that limits climate impacts, biodiversity loss and resource depletion. Link our natural and built systems to achieve a balanced environmental, social and economic outcome that improves the health of our communities and regenerates our environment. Don't degrade surrounding sites, risk human and environmental health or introduce new invasive plants. Use as many local products and recycled waste products as possible.

In summary, make human and environmental health, smart and sustainable development the top priorities and create a legacy we can all be proud of for many generations. Feel free to contact me at 223-8458 if you have any questions.

Sincerely yours,

Chris A. Dacus, President
Hawaii Chapter of the American Society of Landscape Architects
Box 246
Honolulu, Hawaii 96813

Reply Requested :

Yes

Submission Type :

Draft EIS Comment

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 'CC', written in a cursive style.

Chauncey Ching



DEPARTMENT OF THE NAVY

COMMANDING OFFICER
NAVAL STATION
850 TICONDEROGA ST STE 100
PEARL HARBOR HI 96860-5102

11011
Ser N00/028
05 FEB 2009

CERTIFIED MAIL NO. 7007 3020 0002 3044 3834

Mr. Wayne Yoshioka, Director
Department of Transportation Service
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813

Dear Mr. Yoshioka:

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the Honolulu High-Capacity Transit Corridor Project. These comments supplement initial comments provided in our December 17th 2008 letter.

Navy's status should be changed from Participating Agency to Cooperating Agency based on our jurisdiction by law and our special expertise related to the use of Navy lands both within and outside the Pearl Harbor area and along the proposed corridor alignments. As stated in our December 17th letter, Hickam Air Force Base (AFB) and Naval Station Pearl Harbor will join to form Joint Base Pearl Harbor - Hickam in 2010. As such, issues discussed in this letter and accompanying enclosures can be expected to apply to Hickam AFB and related housing areas.

In addition to concerns raised in our December 17th letter, Navy requires a complete understanding of Navy and Air Force properties needed for the corridor alignment. Although the DEIS discusses reduction of Navy road widths and land acquisition at Nimitz Field, Richardson Field, Navy-Marine Corps Golf Course, and Makalapa Branch Medical Clinic, we have not been provided a detailed listing of the full scope of Navy and Air Force properties along the entire corridor alignment. Request the City and County of Honolulu (CCH) provide Navy a letter listing all Navy and Air Force properties required, including detailed drawings and property lines, for all alternatives considered. This will allow Navy to fully understand the scope and breadth of impacts and to provide guidance related to those properties.

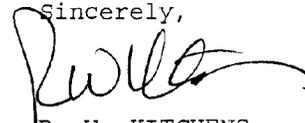
Associated general concerns and specific DEIS comments, along with a site location map of Halawa Landing, are provided as enclosures (1) and (2) to this letter. As a result of the many issues associated with the transit corridor proposal and potential impacts to Navy and Air Force properties, Navy has assembled a team of subject matter experts to address areas such as real estate, security, family

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housing, utilities, fuels, hazardous waste and cultural resources. This will assist in the coordination required between Navy and the City in our role as a Cooperating Agency.

We look forward to continued dialogue throughout this process. Should you have any questions, please contact my Public Works Officer, CDR Lore Aguayo, at (808) 471-2647 or e-mail maria.aguayo@navy.mil.

Sincerely,

R. W. KITCHENS

Enclosures (2)

Copy to:

COMNAVREG HI (N3, N4, N9)
FISC PH (Code 700)
HICKAM AFB (15 CES/CEV - R. Lanier)
NAVFAC HI (ARE1, EV, OPHAM, OPHAM1GW, PRP)
PACFLT (NO1CE)
PHNSY&IMF (Code 900 - D. Webber)

**U.S. NAVY ADDITIONAL COMMENTS ON THE HONOLULU HIGH-CAPACITY TRANSIT
CORRIDOR PROJECT DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)**

(These comments supplement Navy comments of December 17th 2008)

General Comments / Concerns:

1) Navy and Air Force land acquisition. Appendix B of the DEIS reflects a number of Navy-owned lands in the Pearl Harbor area that are identified as being required for the Honolulu High-Capacity Transit Corridor Project. A determination must be made by the Navy as to whether those identified lands can be made available for City and County (CCH) use from a security, operational and legal standpoint. This will require that CCH submit an official letter identifying each parcel (Navy and Air Force) and requesting Navy's comments on the acquisition of those parcels for the Corridor Project. If property can be made available, fee conveyance to CCH would likely be in the best interests of the Navy for liability and administrative reasons. Certain properties may not be available as they have security or operational issues or are encumbered under existing long term agreements to other parties. As noted in our December 17th letter, the process for land acquisition from the Navy requires at least nine months.

Recommend that the DEIS include a discussion that reflects that the acquisition of Federal lands differs from the acquisition of privately owned lands.

2) Impacts to Navy utilities. Identification and any necessary relocation of Navy utilities including high-voltage power lines and underground utility lines will require extremely close coordination with the Navy. We are particularly concerned about water, sewage, and high-voltage electrical lines. No Navy sewer lines run along either alignment (Salt Lake and Airport routes), but several lines run perpendicular to these routes, including a major 18" line from Camp Smith that crosses Salt Lake Boulevard in the auxiliary Stadium (triangle) Parking area. The airport alignment contains several sewer crossings, including one area where an 18" sewer parallels Kamehameha Hwy near the Federal Fire Department area. Water lines run along both Salt Lake Boulevard and along Kamehameha Highway near the Post Office. High voltage lines run parallel to Moanalua Terrace. Of note, abandoned Navy fuel lines exist along the proposed corridor route. Navy cannot guarantee lines are completely empty because of potential water intrusion into these lines over time. Navy will not be responsible for any potential releases from these lines during the course of construction.

3) Impacts to Navy roadways and traffic patterns adjacent to Navy property. Wear-and-tear on Navy roadways from increased traffic to-and-from transit corridor stations and park-and-ride

Enclosure (1)

facilities will result from implementation of any of the build alternatives. Further, Navy believes that traffic pattern impacts will likely result from construction of the Park and Ride facilities and transfer stations. For example, although the Draft EIS states that no effects will be realized at the intersections surrounding the Aloha Stadium Park and Ride, Navy believes that residents entering and exiting Ford Island to and from Kamehameha Highway will, in fact, realize impacts from the additional 600 spaces planned at the Aloha Stadium Park and Ride directly across from the Admiral Clarey bridge (access to Ford Island). We request further mitigation discussions with the City for: (1) roadway maintenance related to those roadways affected by this proposal; (2) traffic congestion near Park and Ride facilities and transfer stations.

4) Noise impacts to Navy housing areas: Although Section 4.9 of the Draft EIS does not specify noise impacts to Navy housing areas, Navy would like to discuss CCH's plans for further mitigation of noise impacts to Navy housing areas, both during construction and during rail operation. Navy recognizes that the Draft EIS discusses implementation of noise-blocking parapet walls and wheel skirts; however, Navy remains concerned about the cumulative noise impacts to Navy housing areas adjacent to Kamehameha Highway, Nimitz Highway, and Salt Lake Boulevard. Navy encourages maximum use of sound absorptive materials in the track area to reduce noise impacts to ambient levels.

5) Construction impacts. All construction adjacent to Navy and Air Force properties and housing areas requires close coordination with the Navy, to include laydown and equipment yards, road closures, utility outages, etc. Navy requests that CCH minimize construction impacts to personnel transiting to and from Pearl Harbor-Hickam and to those living in military housing areas.

6) Impacts to Navy permits. Close coordination is required with Navy related to any impacts from the proposed build alternatives to existing Navy permits, particularly utilities (water and sewer) and drainage permits. Navy is concerned about quality and quantity of drainage and Navy permit effects resulting from corridor construction and from the corridor itself.

7) Security concerns including proximity to Pearl Harbor Naval Station fenceline and housing / parking impacts. The Draft EIS does not specify the transit corridor height and lateral distance from the Pearl Harbor Naval Station fenceline for the Airport and Airport/Salt Lake build alternatives. Further, unauthorized parking and increased vehicular and foot traffic will likely increase around transit corridor stations for the various build alternatives, including the Aloha Stadium Station and Park and Ride, the Arizona Station, the Pearl Harbor Station, and the Ala Liliko'i Station. We request further mitigation discussions with

the City to discuss: (1) appropriate platform height and stand-off distances from the Pearl Harbor Naval Station fence line to ensure adequate Station security; and (2) CCH plans for security and prevention of unauthorized parking in Navy family housing areas and areas adjacent to Pearl Harbor Naval Station, including Halawa landing (Arizona Memorial and museums, Richardson Center Complex, Rainbow Bay Marina, Dry Boat storage, and Oahu Concepts).

8) Integration of public transportation with transit corridor stations. The Draft EIS does not elaborate on the integration of other public transportation systems with the transit corridor. Depending on the time of day, the corridor will run every three, six, or ten minutes. Navy is specifically interested in how other forms of public transportation will integrate with the transit corridor schedules and ultimately transport riders to and from their originating or final destinations, including: (1) Navy and Air Force employment concentration areas (e.g., Pearl Harbor Naval Shipyard); (2) Navy and Air Force housing areas; and (3) Military shopping areas. Further, Navy is interested in discussion of impacts resulting from changes to the public transportation system as it integrates with the transit corridor.

9) Hazardous waste and materials and Installation Restoration (IR) sites. Information contained in DEIS Section 4.11, Hazardous Waste and Materials, requires revision for accuracy as it relates to Navy properties. Specific comments are provided below. Additionally, several IR sites exist along the proposed transit alignment. Navy requires a detailed review of the proposed alignment for 1) subsurface oil monitoring wells, and 2) an underground storage tank (UST) site at the golf course. The DEIS does not contain enough information to determine the potential impacts to Navy property for the western portion of the transit line. Specific information for restoration areas around the Pearl Harbor main complex is provided in the "Specific Comments" section below.

10) Potential Impacts to Navy fuel distribution system. Based on information contained in the DEIS, it appears that the transit line construction may impact the Navy's fuel distribution system as it will be adjacent to a major Navy fuel storage and distribution system. Close coordination with the Fleet Industrial Supply Center (FISC) will be required.

11) Impacts to Archaeological, Cultural, and Historic Properties. Any specific undertakings affecting Navy eligible historic properties require consultation with the Navy. Specific requirements are provided below.

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11) Impacts to Archaeological, Cultural, and Historic Properties. Any specific undertakings affecting Navy eligible historic properties require consultation with the Navy. Specific requirements are provided below.

Specific Comments:

1) Section 4.5 Neighborhoods: 4.5.3, p. 4-45, Aliamanu-Salt Lake description states, "Except for certain areas, Navy allows the general public to drive through these areas, and many motorists travel to and from Kamehameha Highway and the H-1 Freeway." This statement is misleading as these roadways and the roadways through the Navy housing areas near the airport are not specifically intended as main roadways for the general public. Navy currently retains the ability to close these Navy roads under certain security postures. Navy is concerned about increased roadway maintenance related to implementation of any of the proposed alternatives in the DEIS. Navy would like to further discuss with CCH appropriate mitigation measures for direct and indirect effects to certain Navy roadways resulting from implementation of any of the build alternatives.

2) Section 4.11 Hazardous Waste and Materials:

a) 4.11.1, 2d paragraph. Requires slight revision. Hazardous Waste (HW) is primarily regulated by Department of Health (DOH) Solid and Hazardous Waste (SHW) Branch, Hawaii Administrative Rules (HAR) 11-260 series. The HEER Hazard Evaluation & Emergency Response (HEER) group is a mirror of the Comprehensive Environmental Response Compensation & Liability Act (CERCLA) and is responsible for release response of HS Hazardous Substance (HS)/petroleum and cleanup of sites associated with past releases of HS/petroleum. There is a distinction of HW regulation under Resource Conservation and Recovery Act (RCRA), which is the responsibility of the SHW Branch and not the HEER group.

b) 4.11.2, Military Uses, 1st paragraph, 2d sentence. The National Priority List (NPL) site is erroneously referred to as Pearl Harbor Naval Station. The correct NPL site designation is Pearl Harbor Naval Complex.

c) 4.11.2, Military Uses, 1st bullet. Requires clarification. Navy still retains portions of property at the former Naval Air Station Barbers Point (NAS BP). The Navy retained portion of the NAS BP is under Navy jurisdiction and not Hawaii Community Development Authority (HCDA) jurisdiction as noted in the DEIS.

d) 4.11.2, Military Uses, 2 bullet. Refer to the NPL designation comment, Pearl Harbor Naval Station. The NPL is also identified as the former Navy Drum site and active Navy base. The former Ewa Drum facility is not a Navy base and has been closed under the State Contingency Plan (SCP). DOH provided Navy a concurrence letter on the closure of the former Ewa Drum facility. The Installation Restoration (IR)

site of the former Ewa Drum facility is referred to as "Fleet Industrial & Supply Center (FISC) 27 Ewa Junction Motor Gasoline (MOGAS) Spill."

e) 4.11.2, Military Uses, Ranked "1" bullet. Refer to the NPL designation comment, Pearl Harbor Naval Station. Please provide rationale for including this information, as the proposed transit corridor is outside of the borders of the Pearl Harbor Naval Complex. The road systems within the transit corridors are controlled by the State of Hawaii and CCH.

f) 4.11.2, Military Uses, page 4-112, last paragraph, last sentence. The draft EIS needs to clearly state the former Ewa Drum site has been closed under the SCP.

g) 4.11.3, Environmental Consequences, Common to All Build Alternatives, 2d column, 1st paragraph, 3d bullet. Please clarify the connection between fluorescent light tubes and vehicle components. Vehicles use lithium, halogen, and/or incandescent bulbs.

h) Additional IR Site information:

i) Subsurface Oil: The identified proposed transit line runs adjacent to an existing subsurface oil plume. Estimated limits of the plume nearest Kamehameha Highway area of tank 54 are within 200 feet of Kamehameha Highway. Navy also operates monitoring wells just inside of the fence line along the highway.

ii) Near the Halawa Landing area: The nearest IR site to the proposed rail route would be the Inactive Petroleum Pipeline at Halawa Landing. The area of known petroleum contamination is approximately 400 ft west of Kamehameha Highway (located in the parking lot area approximately 200 ft east of the Bowfin Museum). The approximate site location is shown on the attached map titled CTO61.

iii) Near the area of the golf course: Northern alignment of the Airport Viaduct route is near several former IR sites (mainly transformer sites) and a current IR site: UST NS-29. UST NS29 is at the corner of Building A-19.

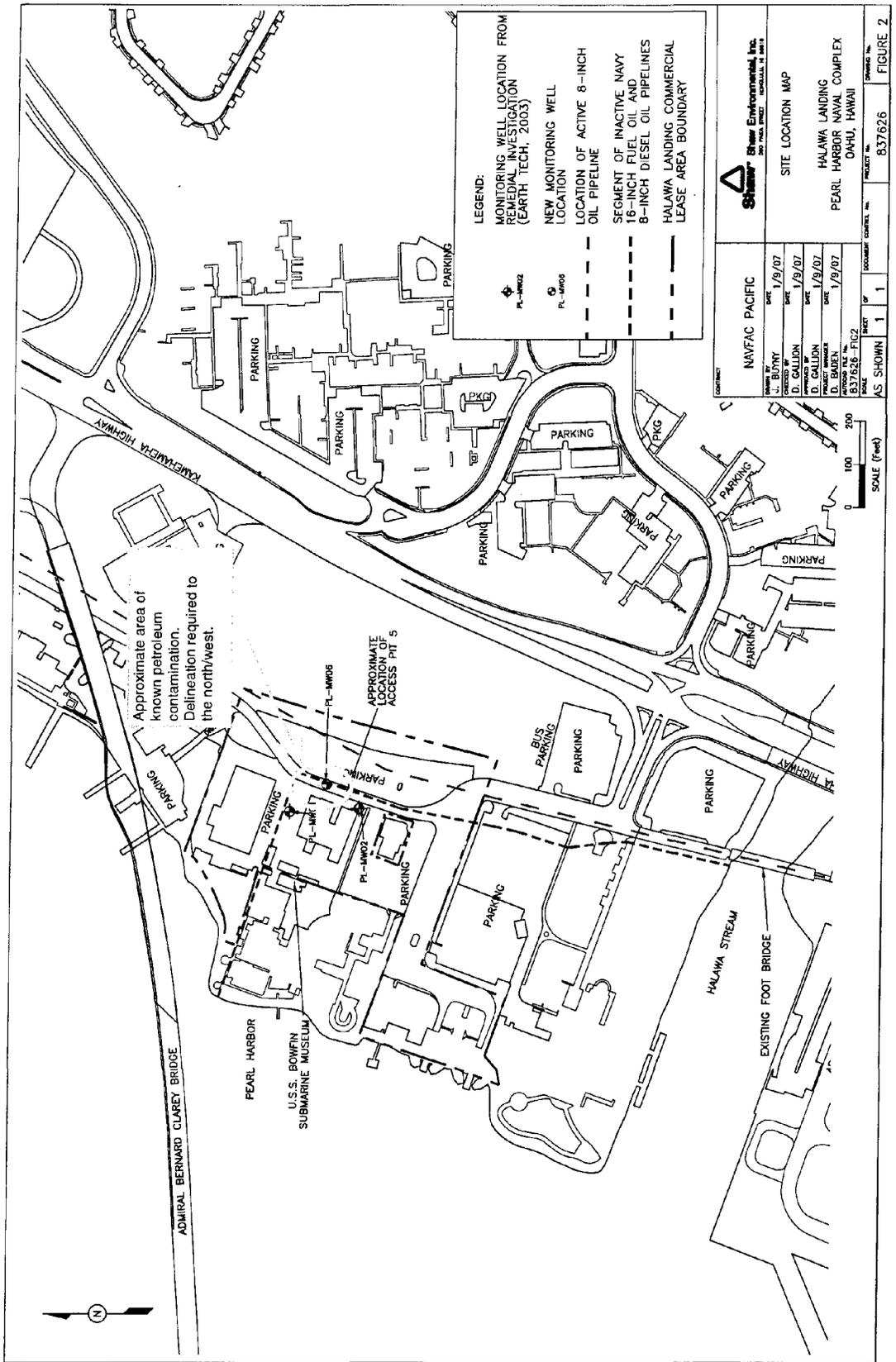
3) Section 4.15 Archaeological, Cultural, and Historic Resources: Any identification of or undertakings affecting a Navy eligible historic facility requires consultation with the Navy. Specific requirements include:

a) CCH will need to consult the Navy during the execution of the specific undertakings affecting Navy properties containing eligible historic assets. This includes Navy review and

coordination during the planning and design phases of each undertaking.

b) The Navy as a Federal Agency retains authority for the identification of eligible historic properties on Navy land. As such, CCH should consult with Navy during identification of potentially eligible Navy historic properties along and adjacent to the proposed transit corridor.

c) CCH will need to consult with Navy regarding the assessment of the Area of Potential Effect on historic properties for all undertakings, inclusive of all other requirements under the National Historic Preservation Act of 1966, and as amended.



ENCLOSURE(2)



SERVCO PACIFIC INC.

2850 Pukoloa Street • Suite 300 • Honolulu, Hawaii 96819 • Telephone: (808) 594-1300 • Facsimile: (808) 623-3337 • www.servco.com

February 5, 2009

Via Email: woshioka@honolulu.gov and Regular Mail
Mr. Wayne Y. Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

RE: Honolulu High Capacity Transit Corridor Project
Draft Environmental Impact Statement/Section 4(f) Evaluation

Dear Mr. Yoshioka:

Servco Pacific Inc. ("**Servco**") is the landowner of the following parcels of real property (in Waipahu and Kakaako):

Waipahu: TMK: (1) 9-4-015-014
(1) 9-4-015-015
(1) 9-4-015-022
(1) 9-4-019-055
(1) 9-4-019-061 (1/11th ownership interest)

Kakaako: TMK: (1) 2-1-031-030

which are located adjacent to the contemplated Honolulu High Capacity Transit route (the "**Project**"). Servco has for many years operated automotive facilities at both locations. In addition, the current Conceptual Right of Way Plans show that a portion of one of the Waipahu parcels (TMK: 1-9-4-019-061) and the Kakaako parcel are both designated for partial acquisition as part of the Project.

Consequently, the planned Project has an immediate, direct, and material impact on Servco. Therefore we submit the following comments based on our review of the Draft Environmental Impact Statement for the Honolulu High Capacity Transit Corridor Project dated November 2008.

In general, we are concerned about the adverse impact on our customers, employees, business activities, and automotive facilities which will be caused by the planned construction activities, noise, dust, realigned traffic flow, and modified vehicular access into the Servco properties as work progresses along the Project route in the

Hawaii • Guam • California
Automotive Products • Insurance Services
Consumer Products • Investments

AR00057523

vicinity of the Servco properties. The Draft EIS states that prior to commencement of construction, the contractor will be required to develop a plan to reduce economic hardship for existing businesses along the project alignment during construction activities. However, the draft EIS does not address whether the neighborhood businesses will be informed by the City or the Contractor on construction activities near their properties and if these businesses would be afforded an opportunity to participate and provide input into that plan prior to its adoption into the construction contract. Servco also understands that the Project will likely be constructed in multiple phases and therefore feels that plan to address and reduce economic hardship along the Project alignment should be developed, reviewed and commented on by the neighborhood businesses in phases matched up to the actual construction schedule. Servco feels it is vital for both the Contractor and City to effectively communicate the Project's ongoing construction work and schedule on a regular and weekly basis in order to mitigate and minimize hardships to these neighborhood businesses so unanticipated problems can be addressed promptly and effectively. In our view, the opportunity to submit our input and comments to the Contractor and City on how our operations may be affected by the Project's construction work and the Contractor's mitigation plan is essential. This will allow us a reasonable opportunity to plan our business activities on the Servco properties in anticipation of the construction period and the disruption it will inevitably create.

The Servco properties which will be impacted by the Project are (a) Servco Auto Leeward ("**SAL**"), which includes an automotive showroom, service and parts facility, fronting Farrington Highway at Waipahu Depot Street, and an open parking lot (TMK: 1-9-4-019-061) (the "**Waipahu Property**"), and (b) Motor Imports ("**MI**"), a service and parts facility located in Kakaako on the corner of South Street and Halekauwila Street (the "**South Street Property**"). The Project will run by Servco's SAL dealership along Farrington Highway, and the Waipahu Transit Station will be located on one of the Waipahu parcel that Servco has an ownership interest. Motor Imports in Kakaako will be affected by the construction of the Civic Center Station near and on a portion of the South Street Property. Our comments regarding these specific properties are provided below.

A. Waipahu Property:

1. Due to the 30-foot high fixed guideways in the vicinity of the Waipahu Transit Station the visibility of our SAL dealership will be greatly reduced. Automotive dealerships value high visibility, street frontage, and convenient street access to attract customers for its vehicles for sale and to provide convenient access to service area for vehicles and parts for its customers.
2. The planned Waipahu Transit Station on Farrington Highway is in close proximity to our SAL operation, and construction activities will impact

traffic flow in both directions. In addition, there is The Oahu Regional Transportation Plan 2030 which includes the Farrington Highway widening project to relieve traffic congestion between Golf Course Road and Fort Weaver Road. What is the schedule for these projects? Will construction be phased in such a manner that these projects will not overlap? Will the City be coordinating the Farrington Highway work with the State? Will the City be retaining a consultant for a traffic study for the impact of the Project on the Project's routes?

3. The water table in the Waipahu area is high. What is the potential impact on the surrounding structures due to displacement of groundwater during drilling and installation of the foundation for the light rail system and associated transit stations?
4. There are overhead and underground utility lines along Farrington Highway and the cross streets. Will SAL's utility service be disrupted when these utility lines along Farrington Hwy are relocated?
5. As noted above, Servco has a one-eleventh (1/11th) ownership in TMK: 1-9-4-019-061 in Waipahu. The City has plans for partial acquisition of this property. If traffic is rerouted to the cross streets of Awalu and Mokukaua, this will increase the vehicle traffic to the back of TMK: 1-9-4-019-0'55 which is wholly owned by Servco. As a landowner and business operator, how will we be kept informed of changes and activities affecting both parcels?

B. South Street Property:

1. Servco operates a parts and service facility on the South Street Property (TMK: 1-2-1-031-030). Automotive service operations are very land intensive. Pursuant to the Conceptual Right-of-Way Plans the City plans to acquire a portion of the South Street Property from Servco for the Civic Center Station. According to the Draft EIS, a land area of approximately 40 feet in width by 300 feet in length will be acquired. The proposed acquisition would involve the taking of the land and building housing our existing service bays and facilities, reduce the existing paved area for customer parking and adversely affect the existing South Street entry and exit into the South Street Property. The Draft EIS does not adequately consider a possible added cost to the City's acquisition of a portion of the South Street Property associated with coordinating the relocation of the service bays and facilities and reconfiguration of the South Street Property

so as to minimize disruption with the ongoing business activities on the South Street Property.

2. The Draft EIS does not adequately consider whether it is feasible for the Servco automotive business to continue in a reconfigured set up on the South Street Property after the taking of a portion of the South Street Property, and thus whether the City would have to acquire the entirety of the South Street Property and not just a portion thereof as currently contemplated in the Conceptual Right-of-Way Plan.
3. The Draft EIS does not appear to adequately consider the alternative of designing and building the Civic Center Transit Station on the vacant parcel of land located on the makai side of Halekauwila Street. Such an alternative could greatly minimize and mitigate the adverse impact on the existing Servco automotive facilities on South Street discussed in B.1 above.
4. The existing buildings on the property are older. We are concerned with how pile driving may affect the structural integrity of the buildings and the calibrated readings of automotive equipment used in Servco's automotive service business. Has consideration been given to alternatives that may be available to mitigate such impact?
5. Similar to the Waipahu Property, the water table in Kakaako is also very high. The Draft EIS does not indicate or adequately address how water displacement will be handled so as to protect and preserve the structural integrity of the structures on the South Street Property.
6. Street parking in the Kakaako area is inadequate at present. We are concerned that the influx of construction workers into the area during the course of the Project will make a bad situation even worse, as Servco employees, construction workers, and customers of neighborhood business will all be vying to use the already limited number of parking stalls in Kakaako. This problem will be compounded by lane closures and traffic circulation changes. The Draft EIS does not address how these problems will be mitigated or addressed? Will there be a traffic study on the impact of the Project for the Civic Center Transit Station and Halekauwila Street route?

As noted above partial land acquisition is planned for two Servco parcels, TMKs 1-9-4-019-061 (Waipahu) and 1-2-1-031-030 (Kakaako). The Draft EIS provides

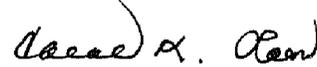
Mr. Wayne Y. Yoshioka, Director
Department of Transportation Services
February 5, 2009
Page 5

insufficient information on the acquisition process and procedure, including without limitation, its timing and manner of determining compensation to affected landowner.

In the process of finalizing its Environmental Impact Statement for the Honolulu High-Capacity Transit Corridor Project, we ask that the City & County of Honolulu prudently address and respond to our questions and concerns.

Sincerely,

SERVCO PACIFIC INC.



Carol K. Lam (B)
Senior Vice President

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RECORD # 521 DETAILS

Status : Initial Action Needed
Creation Date : 2/6/2009
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Submission Date : 02/06/2009

Submission Content/Notes : Draft EIS comments regarding Honolulu Rail Transit
Submitted Feb. 6, 2009 by Dennis Callan, co-chair, Stop Rail Now
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Please address each paragraph specifically, and explain why you agree or disagree.

At the beginning, let me explain that the following document represents a listing of most of the major objections our organization has raised about Honolulu's proposed rail system. While our statements may not specifically refer to particular sections of the EIS, they are all relevant to the big picture of rail, its supposed advantages, its true problems, and the alternatives, and are thus relevant to EIS considerations. Our concerns have now taken on even greater urgency considering the nation's economic crisis. How has your financial projection changed as a result of these events which transpired subsequent to your initial planning? How can we pay for rail, upwards of \$5 billion of local money, when the state and county are running deficits and the public has lost uncounted billions in home equity and personal savings? Are there not pressing social needs we must fund? Will the state's new highway improvement plan provide a larger, more effective solution than rail? Was the state's new highway improvement plan considered in your studies? If the state's plan were fully implemented how would it affect your numbers about traffic congestion projections? Is it more important to build rail or should state workers be forced to work an additional 10 years before retirement as has just been suggested by the Speaker of the House?

Most grievous of all the many EIS deficiencies listed below is your lack of proper study of the HOT lane alternative. Why was your AA study so superficial and biased?

Because the following issues are so major and have not been properly addressed in your draft EIS, we ask that a supplement EIS be created that will fully deal with these issues. Merely revising your draft is not sufficient. We need a major new study.

In the days before the Nov. 4 election the city made claims that the draft EIS showed that traffic would be reduced by up to 30% by rail, giving the public the misleading impression there would be a reduction from today's levels. Is this what you meant? If not, how could you be so flagrant in trying to mislead and misdirect the voters days before the election?

Where in the draft EIS is there any substantiation for those claims?

SECTION 1:

Why rail transit never improves traffic congestion and why relief must come from highway options, such as HOT lanes

1. Since the advent of the Model-T, followed by the first suburban shopping center in 1923, and then the incredible expansion of suburbs after World War II, we have radically changed our means of getting to work. Not only getting there, but also what we do on the way there - and on the way back. We take our children to school, go for exercise, or go shopping and we no longer shop downtown.

2. Nor do we shop at the small local store, but in supermarkets, and lately, even more distant big box stores like Costco. Our children are in larger, more distant, schools whether public or private, and most of us drive them there.

3. As we move to the suburbs from town, say, Kaimuki to Mililani, we find that bus service is now every hour instead of every few minutes, and so we use it less.
4. We have always valued our time but now, because of increasing incomes, our time is more valuable than it used to be. Accordingly, it plays a bigger role in the decision about how we commute.
5. These are some of the factors that have altered the way we live, and why the percentage of commuters using public transportation has declined every decade since the U.S. Census began measuring it in 1960.
6. It is not that we are in love with our automobiles; it is that we value our time.
7. This is the principal reason that public transportation's share of commuters is declining on Oahu, the mainland, Europe and virtually everywhere else. This share is critical.
8. To hold rush hour traffic congestion on Oahu in 2012 at year 2000 levels we would have to keep the number of those commuters who are driving to work in 2012 the same as the year 2000. Given the state's forecast of a 10 percent increase in all commuters for 2000-2012, we would have the result shown in the lower table. As you can see, it tells us that, all else being equal; we would have to double the percentage of commuters using public transportation. How likely is that?
9. Before we go on, let's get our terms straight. We must use Metropolitan Statistical Areas (MSA's or metro areas) rather than cities. It is useless to discuss the city of San Francisco without including Oakland and all the other cities that are contiguous to it. And that is why the federal government's data is usually about metro areas, for example, the San Francisco MSA. Similarly, the city of Portland does not run its public transportation but rather Trimet, the three county contiguous area. San Diego's transit is run by SANDAG, the San Diego Association of Governments.
10. Further, we must discuss combined bus and rail transit use because we cannot, in any sensible way, separate them; the use of one without the other is not reliable. For example, Vancouver, Canada, and many other cities offer passes for bus and rail combined and so there is no accurate data about who is using what. In discussing commuting, the most relevant statistics are those of the U.S. Census and the U.S. Department of Transportation and that is what we use here. We also use the nationally recognized Texas Transportation Institute studies on traffic congestion.
11. U.S. metro areas essentially stopped building rail lines around 1920 as rail transit ridership peaked and the first serious and reliable bus service appeared. From that point on until the 1970s, hundreds of U.S. cities removed their streetcar lines and substituted motor buses because it was so much less expensive.
12. Then starting in the 1970s, U.S. transit agencies projected significant increases in public transportation commuting by re-instating rail transit. It did not work out that way.
13. What happened was that of the 15 metropolitan areas with new rail transit, only one managed to increase the percentage of commuters using public transportation during the 1980 to 2000 period. That was San Diego and it only managed an increase from 3.3 percent to 3.4 percent - hardly earth shattering - all others declined.

14. Note that outside of the New York metro area, the percentage of commuters using public transit is very small; nationally those commuting by automobile are twenty times greater than those using transit.

15. This is why, as we see with the earlier Honolulu example, any significant population growth results in new drivers totally overwhelming new transit users. Without major increases in this percentage, new drivers will always overwhelm new transit users.

16. Nationally, 13 million more commuters resulted in 13 million more drivers and a slight decrease in transit commuters.

17. The Texas Transportation Institute recently divided U.S. metro areas into four groups according to population size with the following results:

18. Very Large: 11 metro areas with over 3 million population all with rail lines except Houston - it had the least increase in traffic congestion of the group.

19. Large: 27 metro areas with 1 to 3 million population, half with rail lines. Aside from those areas with little or no commuter growth, the four best performers had no rail lines.

20. Medium: 30 metro areas with 1/2 to 1 million population including Honolulu. Only Salt Lake City had rail and they had the third worst showing of the 30.

21. Small: less than 1/2 million, none with rail lines.

22. This meant that all U.S. metro areas with significant increases in commuters saw a dramatic worsening of traffic congestion - rail transit had made no difference.

23. Everyone agrees that we have a traffic congestion problem and that the worst on Oahu is that found on the freeways and highways along the Leeward Corridor.

24. However, since rail transit has done nothing to relieve traffic congestion in any other U.S. city, it begs the question, what makes anyone think it will do it here?

25. Instead, we believe that the new high-tech High Occupancy Toll lanes (HOT lanes) have shown such promise and such public acceptance that they may be a far preferable alternative.

26. Our proposal is for a two-lane reversible, elevated HOT lane highway between the H1/H2 merge near Waikele and Pier 16 near Hilo Hatties.

27. Buses and vanpools would have priority and travel free, other vehicles would pay a toll that would be collected electronically by way of a pre-paid smart card, as is quite commonplace on the mainland today. As on the San Diego I-15 HOT lanes, the toll price would be dynamically calculated every few minutes to keep the lanes full, but free flowing.

28. One of the more surprising outcomes of implementing HOT lanes is that they are popular with motorists across all income groups. Even those who use them rarely favor them because it is an option they can use in an emergency.

29. A single highway lane with free-flowing non-stop traffic carries up to 2,000 vehicles per hour and with two lanes that means removing 4,000 vehicles from the existing freeway, or 25 percent of the rush hour traffic now using that corridor.

30. Our projection of the HOT lanes traffic of around 4,000 vehicles does not have to be calculated since we know that rush-hour highways are always fully used; we only have to project the toll price that will keep the HOT lanes full but free-flowing. Judging from San Diego's I-15 and

Orange County's SR-91 the average cost will be about \$4.50 under normal circumstances and up to \$7.75 for special periods such as Friday evenings.

31. A major advantage of HOT lanes is that traffic travels at uncongested freeway speeds of 60mph whereas rail transit can only average 22.5 mph because of stops every half mile. The HOT lane speed enables buses to make two trips in the time it now takes to make one. Further, buses on HOT lanes may travel door-to-door whereas rail nearly always requires transfers. HOT lanes offer both motorists and bus riders a choice of avoiding traffic congestion. The regular freeway is still there and available for free with less congestion than before.

32. The last issue is that of cost. The Mayor and DOT have been using \$2.6 billion for a Kapolei to Iwilei first segment. We have added 15 percent per mile for the difficulty of in-town construction and going over H-1 at University Avenue, and that adds \$1 billion to the cost. Since the federal funding has a practical limit of \$0.5 billion that will leave \$3.1 billion for local funding as shown in the table below.

33. The 1/2 percent increase in the G.E. Tax does not come close to funding this system, especially considering annual losses of \$59 million and making sufficient allowance for bond interest. Our calculations show that in the out years the revenues from the tax will barely cover the operating losses and bond interest leaving little or nothing for capital repayment. In addition, there has been no consideration for cost overruns.

34. When one considers that this rail transit project would entail a local per capita cost five times greater than any other rail system in the U.S., even after allowing for inflation, that alone should give us pause, even if we are under the mistaken impression that a rail system would have benefits.

35. On the other hand, the 10-mile long elevated HOT lanes would have a total cost of \$1 billion, or \$100 million a mile. Rail proponents have said that we cannot build it for that price and that it is too wide to use pedestal construction. The earlier rendering shows the Tampa Expressway now under construction which uses pedestal construction and is three lanes wide. Even though it is 30 percent wider than our proposal, it will open this June 2006 at a cost of \$52 million a mile. Consultants at the 2002 Governor's Conference on Reversible Tollways had initially calculated the cost at \$70 million per mile and later added \$30 million for unforeseen problems and other cost overruns.

36. HOT lanes are eligible for the same federal fixed-guideway funding as the rail proposal, which means that with \$1 billion total cost and \$500 million federal funding, it would only need \$500 million in local funding, there being little or no operating costs.

37. Of this \$500 million, toll revenues of \$20 million annually would pay off \$300 million over 25 years using five percent GO bonds. Another \$13 million annually would pay off the remaining \$200 million balance over 25 years. If we cannot find \$13 million annually from city and state budgets without raising taxes someone is not making an effort.

39. Rail has never improved traffic congestion anywhere,

40. We have a traffic problem - not a transit problem,

41. Tax-free HOT lanes give motorists a choice,

42. Tax-free HOT lanes outperform rail transit easily,

43. We can afford HOT lanes and we cannot afford rail.

Why did you not give proper consideration to the following? Please address each statement specifically, and explain why you agree or disagree.

Section 2

Alternative Solutions:

1. Staggering work and school hours
2. Implement 4/5 day work schedules (one week 4 days, next week 5 days, days off alternate)
3. Implement 4x10 work shifts (four 10 hr shifts 4 days)
4. Change UH class hours to not commence during peak rush hours; possibly only lecture
5. courses before 10:00am which are broadcast over the internet so students can stay at home until after 9:00am
6. Reversible elevated lanes on Nimitz viaduct. The State Transportation Department has already made plans this project, which would be very effective, improving existing traffic needs.
7. Decrease response time to roadway accidents/debris removal/investigations
8. Incentives to businesses for home-based employment (which will become more ubiquitous with technology)
9. Pay at the pump insurance
10. Require developers on the west side to build commercial and industrial space equal to every residential space built
11. Develop a FUNCTIONING traffic management system that can synchronize and control traffic lights to address problem areas. Install more "smart" traffic lights that can read traffic flow/speed.
12. Remove all unregistered cars, cars without insurance or safety stickers from the roads
13. Employees that don't drive cars to work should be credited for not requiring parking
14. stalls (most employers offer parking stalls for employees but DON'T pay them \$200+
15. month or more, which is the cost of parking in town, if they don't need them)
16. Create a better urban plan with higher density housing in the urban core and discourage continued suburban sprawl in suburbs. Change Land Use Ordinance to allow grandfathering of existing higher-density homes, to curb urban sprawl.
17. More dedicated HOV lanes.
18. Install traffic lights at freeway entrances
19. Expanded contraflow lanes (e.g. Dillingham)
20. Fix potholes which cause accidents, tire blowouts, and slow cars down
21. Advanced tow truck deployment system for accidents and stalls
22. Install more bicycle lanes.
23. Free public parking for microcompact cars (e.g. Smart car, et al)
24. Tax credits for developers of commercial and industrial space in West Oahu
25. Expanded carpooling program utilizing hybrid and electric van
26. Build a REAL ferry system (NOT THE BOAT)
27. Provide incentives to encourage use of electric riding vehicles, such as electric mopeds and electric-powered bicycles (e.g. "cages" or lockers for parking)

28. More grade-separated underpasses at critical intersections.
29. More distance learning courses for colleges and high schools
30. Raise parking rates for government workers to market rates

Section 3 BRT Success

Why would these success stories not apply to Honolulu? Please address each paragraph specifically.

1. While early adopters of bus rapid transit, such as Curitiba (whose system opened in 1974), Pittsburgh (1977), and Ottawa (1983), have shown that BRT is an effective transit mode, it is only over the last decade and a half that interest in BRT has skyrocketed to its current level as its ability to serve lower-density neighborhoods and its cost advantages over other modes have become better known. Today, BRT systems operate in 19 countries on five continents, with many more systems being constructed or planned. Interest in the mode has also come from the federal level. Since 1999, when the Federal Transit Administration launched a BRT demonstration program, BRT systems have been implemented in Boston; Eugene-Springfield, Ore.; Santa Clara County, Calif.; and are currently being implemented in Cleveland; Hartford, Conn.; Houston; New York City; Westchester County; and other places.

Las Vegas

2. In 2004, the Regional Transportation Commission of South Nevada introduced MAX (Metropolitan Area Express), a BRT line acting as a supplement to the heavily-used Route 113 bus line in Las Vegas. This service incorporated architecturally pleasing stations, high-capacity European buses with multiple doors, off-vehicle fare payment, dedicated bus lanes on most of the route, signal priority, and level boarding at bus stations. After six months, ridership on the corridor had increased by 25 percent (from 7,800 to 9,800 passengers per day), and 25 percent of MAX riders said they were new to transit.³⁷ MAX cut travel time on the 7.5-mile corridor in half (to 25 minutes) and gained a reputation for reliability and convenience (as measured by passenger surveys).

Los Angeles

3. Los Angeles is often considered the city of the automobile, but it has also engineered two successful experiments in bus rapid transit. In 2000, the city unveiled "Metro Rapid" bus service on two demonstration corridors. Metro Rapid lines incorporated simple routes, frequent service, signal priority, level boarding, and an aggressive branding and marketing campaign; this "BRT-lite" (not incorporating dedicated lanes, high-capacity buses, off-vehicle payment, or multiple-door boarding) service improved travel time on both corridors by more than 20%, increased ridership by about 40% (daily ridership on the two corridors was 77,000 before Metro Rapid service began, and 107,400 after), and was perceived by riders as "a quantum leap in service performance and quality."³⁸ About a third of the increase in ridership was from new transit users. Los Angeles has since created additional Rapid corridors and will have a total of 28 Rapid lines by 2008.

4. In 2005, Los Angeles opened the Orange Line, a full-fledged BRT service which featured a dedicated busway, off-vehicle payment, and the Metro Liner, a 60-foot bus that the LA Metropolitan Transit Authority bills as "the most advanced transit vehicle ever introduced in North America... the biggest leap in style and appearance our industry has

seen in 30 years." During preliminary studies, Los Angeles' MTA projected 22,000 daily boardings on the 14-mile corridor by 2020. The Orange Line averaged 21,828 daily weekday boardings in May 2006, nearly meeting this prediction 14 years ahead of schedule.

TOD

5. In addition to providing commuters with an effective alternative to driving, a cross-corridor transit system like bus rapid transit could afford municipalities the opportunity to pursue transit-oriented development (TOD). TOD is a land-use strategy whereby residential, office, and retail development is concentrated around transit stations. The term also refers to the developments themselves. TODs are typically mixed-use, walkable developments with higher than average density. Compact development oriented around transit stations has been proven to increase transit ridership and increase real estate values around the station.⁴¹ A comprehensive assessment of TOD as practiced in the United States identified many other benefits.⁴² Transit-oriented developments tend to command higher rents than comparable developments not close to transit, yet are also natural locations for affordable housing as residents of TODs do not need to own as many automobiles or use them as often as non-TOD residents. TOD is therefore a strategy that can both revitalize struggling neighborhoods and attract development. Because transit-oriented developments are denser and create less car use than non-TODs, a landuse strategy focusing on TODs preserves open space and reduces the cost of infrastructure such as roads and sewage lines. Reduced car use means reduced traffic congestion and air pollution. Proponents of TOD do not claim that these benefits magically appear through the creation of a transit stop; rather, they accrue from the synergy between transit access, mixed-use development, and density. Maximizing these benefits requires careful design; there is no "one-size-fits-all" TOD blueprint. Project for Public Spaces is one internationally known nonprofit which focuses on what it calls "placemaking," for example. In addition, some private developers specialize in building TODs.

6. In poor market conditions, development is less likely to occur. But when market demand exists, land-use regulations and developer incentives can focus growth around transit stations. For example, New Jersey's Transit Village Initiative provides funding and technical assistance to 19 designated "transit village" municipalities which engage in TOD around NJ Transit rail and bus stations (see left). Boston's TOD-supportive policies include a cap on downtown parking, a requirement that plans for large developments include transportation mitigation, and increased police presence around transit stations considered unsafe.⁴⁴ In many municipalities, zoning regulations must be tweaked to allow for mixed-use developments.

7. It has been argued that developers shy away from bus transit-oriented development because of buses' lack of permanence—unlike a rail line, a bus route can be easily changed, hurting businesses built to take advantage of proximity to transit. This criticism is not particularly relevant to high-end, capital-intensive bus rapid transit systems. BRT may be cheaper to implement than rail, but it still represents a sizeable investment, particularly when dedicated busways are involved. A review of the academic and government literature on bus rapid transit and transit-oriented development concluded that "the argument that fixed rail

infrastructure has more magnitude and permanence compared to busways is weak."

8. In Ottawa, transit-oriented development centered around BRT has been wildly successful. Strong land-use controls have concentrated commercial development around Ottawa's Transitway.⁴⁶ Between 1988 and 1991 alone a billion Canadian dollars of development was built or in the process of being built along the Transitway. Stations anchor office parks, shopping malls, and mixed-use developments; one station is even directly connected to a hospital. More evidence for bus transit-oriented development comes from Pittsburgh's busway system. A 1996 analysis of Pittsburgh's 9.1-mile East Busway found that between 1983 (when the busway opened) and 1996, 59 new developments (including retail, office, residential, and medical complexes) valued at \$302 million had been built within a 6-minute walk of busway stations.⁴⁷ This was despite terrain constraints which limited development opportunities, despite declining population in the communities adjacent to the busway, and despite the absence of Ottawa-style land-use planning.

9. The Port Authority of Allegheny County estimates that another \$203 million in development occurred between 1996 and 2004.⁴⁸ These are not the only successes. Areas as far-flung and different as Seoul, Korea; Curitiba, Brazil; and Boulder, Colorado have had success with bus-centered TOD.⁵⁰ It can happen here as well. At a recent land use charette, the Regional Plan Association identified several spots in the Rockland half of the Tappan Zee corridor that could support transit-oriented development, including Nanuet, Airmont and Montebello, and Suffern. The Westchester Department of Planning has identified Tarrytown, White Plains, and Port Chester as areas primed for downtown density increases.⁵¹ The success of transit-oriented developments depends on multiple factors, including political leadership, government incentives, landuse regulations, the strength of the real estate market, and the level of traffic congestion in the area (which affects demand for transit-oriented living).

10. But it cannot be overemphasized that one of the most critical factors is the effectiveness of the transit system. Only when a transit system effectively connects places does access to transit-the heart of the TOD concept-become a valued commodity. And so the question of which transit mode can best support TOD is inextricably linked to the question of which transit mode is best suited to the development and commuting patterns of a given area.

Section 4 HOT Lanes

Why would these success stories not apply to Honolulu? Please address each paragraph specifically.

1. Mark Muriello discussed the Exclusive Bus Lane (XBL) in New York City. He described the tunnels and bridges operated by the Port Authority of New York and New Jersey, the operation of the Lincoln Tunnel, and the XBL. He also highlighted recent studies examining options for enhancing operation of the tunnel and increasing capacity.

2. The Port Authority of New York and New Jersey operates a number of bridges, tunnels, and terminals in the New York City area. These facilities include the George Washington Bridge, the Bayonne Bridge, the Goethals Bridge, the Holland Tunnel, and the Lincoln Tunnel.

3. The Lincoln tunnel serves the midtown corridor into and out of Manhattan. The tunnel includes three tubes, each with two traffic lanes.

In the morning, two tubes, or four traffic lanes operate in-bound toward Manhattan. In the midday, the middle tube operates with one lane in each direction of travel, providing a total of three lanes inbound and three lanes outbound. In the afternoon, two tubes or four traffic lanes, operate outbound from Manhattan.

4. The XBL provides priority for buses approaching the Lincoln Tunnel in the morning, inbound direction. The XBL is a contraflow lane for buses only on I-495. The XBL uses the inside lane of the westbound freeway for buses. The configuration provides for three general-purpose lanes and the XBL lane in the eastbound direction and two general-purpose lanes in the westbound direction.

5. The XBL is the busiest bus lane in the U.S. Some 1,700 buses use the lanes on a daily basis. These buses serve 62,000 weekday commuters. The XBL serves more commuters to Midtown than PATH, Ferries, or Penn Station commuter rail. The XBL saves commuters 15-20 minutes each day compared to traveling in personal vehicles.

6. The Lincoln Tunnel and the XBL are significant parts of the mass transit system in the New York City area. Buses carry nearly 80 percent of all trips through the Lincoln Tunnel during the 6:00 a.m.-to-10:00 a.m. time period. The XBL alone carries over 50 percent of these commuters. Approximately 55 percent of all bus commuters to the Manhattan CBD arrive via the Lincoln Tunnel.

7. The number of buses using the XBL has increased significantly over the past 25 years. A number of operational improvements have been made to deal with these increases and to enhance bus operations. A new acceleration lane was added to help maintain travel speeds and traffic flow at merge points. The acceleration lane helped increase throughput of the XBL.

8. Capacity shortfalls have also been addressed with operational changes to enhance efficiency. Examples of these operation changes include prohibiting charter buses prior to 9:00 a.m. and prohibiting empty buses at all times. Other examples include the requirement that all XBL buses have E-Z Pass electronic toll payment tags and opening the XBL 15 minutes earlier.

9. Planning is also underway examining the long-term transportation needs in the corridor. A range of options for the corridor are being assessed in partnership with an array of partners. These partners include federal, state, regional, and local agencies. Planning activities include a simulation of the Lincoln Tunnel corridor, and XBL expansion feasibility study, and a West Midtown bus parking and staging study. Other efforts include the Lincoln Tunnel HOT/express bus lane options study and the Lincoln Tunnel HOT/commercial vehicle priority lane options study.

10. The Federal Transit Administration (FTA) is sponsoring a study to evaluate the feasibility of creating a second priority bus lane. The objective of the study is to increase the passenger throughput of the corridor and to enhance the reliability of the XBL. A full array of options are being explored. These options include operational alternatives to improve traffic flow and safety, physical alternatives for lane separation and ramp connections, and capital options to expand capacity. Capital options include the potential of widening the roadway, removing the center piers in the tunnel, and an elevated roadway scheme. Very limited right-of-way and the geometry of the existing facility provides

significant challenges for many of the options.

11. The FHWA's Value Pricing Pilot Program is sponsoring a study of pricing options to manage demand on the XBL with HOT lanes. A second XBL lane would be underutilized initially, so the study is examining the potential to fill some of the available capacity with non-bus HOVs or with non-HOV vehicles. The study is exploring pricing options that balance traffic demand with non-HOVs. Stated preference surveys of motorists are being conducted to help determine the tradeoffs between price and LOS variables, including travel time savings and trip-time reliability.

12. The Lincoln Tunnel HOT lane study will help quantify and address concerns with potential lane conversion. The study will examine the LOS and delay in the remaining two regular travel lanes. It will also assess traffic queuing in the remaining regular travel lanes and the residual impacts on the local street network. The study will consider the need to balance demand for a new managed lane to ensure bus priority treatment and effective capacity utilization.

13. The HOT commercial vehicle priority options study will explore the potential for commercial vehicles to receive priority treatment in a new special-use lane during the shoulders of the morning peak-period. The objective of this study is to find ways to take advantage of the presence of a separated lane to create travel time advantages and reliability improvements for small package and local delivery trucks.

The Evolution of Houston's Express Bus System

14. Jeff Arndt discussed the evolution of the express bus services in Houston associated with the development of the HOV lanes. He described the initial bus services operated with the I-45 contraflow HOV lane demonstration project, the implementation of more extensive services as the HOV lane system developed, and the integrated bus system in operation today.

15. The I-45 North contraflow lane demonstration project was implemented in 1979. The bus service initiated with the contraflow lane focused on downtown Houston. Bus service was constrained by very limited access. There was no direct access to and from park-and-ride lots, which limited service flexibility. The concept of premium service, which included over-the-road coaches and other enhancements, was initiated with the contraflow lane. This initial authorized vehicle lane (AVL) concept with a focus on downtown Houston evolved into an HOV systems approach.

16. Bus services were expanded as other HOV lanes were implemented. The design of the HOV lanes included direct connector ramps from major park-and-ride lots and transit centers. Service was expanded to non-downtown destinations, such as Uptown and Greenway Plaza. Direct service to these areas was provided from some park-and-ride lots, while connecting service from downtown or other transit centers was used in other cases.

17. The continued development of the HOV lane system provided more flexibility in service. Direct non-CBD services continued to be expanded. Commuter route connections at transit centers were also implemented. In addition, a few two-way ramps were developed. Limited off-peak service was provided on some routes.

18. The Houston experience highlights some lessons to be shared with other areas. First, the 2+ occupancy level caused some of the HOV

lanes to become congested, degrading the travel time savings and trip-time reliability for buses and bus riders. Second, the system changed from trained and tested users to any traveler meeting the occupancy requirement. Over time there has been some erosion of transit incentives and vanpooling has diminished. Recently, there has been a focus on new users. The QuickRide program, which allows two-person carpools to use the I-10 West and the US 290 HOV lanes during the 3+ period for a fee, has been in operation for approximately five years.

19. The current transit system in Houston represents a maturing service network. Transit centers provide connections for shuttle services, neighborhood circulation services, and commuter routes using the HOV lanes. There is also a connection to MetroRail, the new LRT line.

20. Currently, some 104 miles of HOV lanes are in operation in six freeway corridors in Houston. The system also includes 25 park-and-ride lots and 17 transit centers. In December 2004, some 37,400 daily vehicle trips were made on the HOV lanes accounting for approximately 116,000 person trips. A total of 32,415 parking spaces were available at the park-and-ride lots, with approximately 17,126 parked vehicles on a daily basis.

Bus Rapid Transit Studies in the State of Maryland

21. Robert Boot discussed BRT studies and projects in Maryland. He described the main characteristics of BRT, summarized current BRT studies and projects in Maryland, and identified potential issues with implementing BRT.

22. There are a number of factors influencing the consideration of BRT in communities throughout the world. BRT has lower upfront costs than other fixed guideway modes and can be implemented relatively quickly. BRT provides the opportunity to take advantage of underutilized rights-of-way. BRT provides operating flexibility and a way to increase transit ridership in select corridors. Local busways can also use portions of the dedicated BRT transitway.

23. BRT is being considered in Maryland to help respond to increases in travel demand, limited resources, and transportation needs. The new governor and his administration examined future transportation needs and options. The study, Bus Rapid Transit: Flexibility by Design, Offering Mobility Options for Maryland, completed by the Maryland Department of Transportation (MDOT) notes that BRT combines the service and quality of rail with the flexibility of buses.

24. The 2004 Maryland Transportation Plan focuses on the goals of efficiency, mobility, safety and security, productivity and quality. The plan includes numerous strategies for addressing mobility needs. Consideration is given to BRT as a viable alternative to provide realistic solutions to customer needs in corridors throughout the state. It includes active consideration of BRT on managed highway lanes to lower vehicle-related emissions and to improve regional air quality while providing viable new transportation alternatives to Maryland's commuters.

25. BRT projects in Maryland include the Red Line in Baltimore, the Green Line in Baltimore, the I-270/US 15 Corridor, and the Bi-County Transitway. Planning for the Red Line in Baltimore started in 2000. The project originated from the first comprehensive planning effort in nearly 40 years. In March 2003, the Baltimore Region Transit Plan was completed and adopted. The plan serves as a guide for the expansion of the Baltimore transit system.

26. A number of issues had to be addressed with the Red Line project. There was community sensitivity related to possible impacts on property values and environmental concerns. Available right-of-way was limited in many parts of the corridor. There were also concerns about operating BRT in downtown Baltimore without taking an existing traffic lane.

27. The Green Line in Baltimore also originated from the 2003 Baltimore Region Transit Plan. Potential issues with the Green Line included the preservation of green space along the roadway, as an existing grass median is the proposed location for the BRT. Determining potential station locations and existing density and ridership are other potential issues.

28. The Corridor Cities Transitway (CCT) is proposed in the I-270/US 15 corridor. The corridor stretches from the Shady Grove Metro Station in the south to Briggs Ford Road in the north. The corridor includes both Montgomery and Frederick Counties. The CCT alignment was identified in county master plans in the 1970s. In 1994, a Major Investment Study (MIS) was initiated. Public meetings and workshops were held in 1995 through 1997 as part of this process. The MIS recommended alternatives for a detailed planning study. Informational public workshops were held in 2001 and focus group meetings were conducted in 2001 and 2002. The Draft Environmental Impact Statement (DEIS) was completed in 2002 and location/design public hearings were held. Public information meetings on express toll lanes (ETLs) were held in 2004 and minimization options refinements were completed.

29. The Bi-County Transitway project was first identified in the Montgomery County Feasibility Studies in the 1980s related to the County's purchase of the Georgetown Branch railroad right-of-way. A transitway/trail was included in the County Master Plans. In 1996 the MTA completed the Georgetown Branch Transitway/Trail MIS/DEIS and the 2002 Capital Beltway/Purple Line Study was conducted. Possible issues with the Bi-County Transitway include potential community and environmental impacts. The jurisdiction in the area has different preferences. Connections with existing Metrorail service may also be a concern.

30. There are some general issues that may need to be addressed with all the BRT projects. The first issue is the public perception of buses, which still seems to be lower than other transit modes. A second potential issue is balancing a quality system with possible impacts, including community impacts related to limited right-of-way. Third, there may be a perception that BRT is not conducive to transit oriented development. There may also be short-term and long-term implementation concerns.

Virtual Exclusive Busways (VEBs)

31. Robert Poole described the virtual exclusive busway concept. He reviewed the early development of HOV lanes, which included a major focus on buses. He discussed how managed lanes and pricing can provide a virtual exclusive busway. He recognized the assistance of Ted Balaker of the Reason Foundation with the study and the presentation.

32. Value pricing makes it feasible to realize the promise of exclusive busways by providing high-speed, high-frequency bus service that is sustainable on a long-term basis. In the real world of limited funding, however, there is a need to re-think how special-purpose lanes are used.

33. Some HOV lanes began as busways. FHWA/UMTA policy in the 1970s supported busways. There are only a few exclusive busways today, however. These facilities include the Lincoln Tunnel XBL, the Pittsburgh busways, the Miami busway, the Seattle bus tunnel, and surface-street busways in Las Vegas and Orlando.

34. Concerns about low use with bus-only lanes led to allowing HOVs. The Shirley Highway busway demonstration project started as buses, vanpools, and 4+ HOVs in 1973. The occupancy requirement was lowered to 3+ in 1989. The Los Angeles El Monte Busway on the San Bernardino Freeway in Los Angeles was opened to 3+ carpools in 1976. The I-10 West HOV lane in Houston began with a carpool definition of 4+. This requirement was lowered to 3+ and then to 2+. Nationwide, the percentage of commuters who carpool has declined since 1980. The lane miles of HOV facilities have increased during this same time period.

35. A significant percentage of carpools are formed with family members. This trend was identified in *Commuting in America II*. Recent surveys in San Francisco, southern California, southeast Wisconsin, and Minneapolis-St. Paul, indicate that family-based carpools account for between 33 percent and 67 percent of total carpools.

36. It appears that vanpooling has been hurt by carpool preference. The time-savings realized by HOVs is reduced when the lanes are filled with 2+ carpools. Also a larger time savings is needed to offset the time cost of assembling a vanpool. Vanpooling is a highly cost-effective mode. The cost recovery ratio of vanpools sponsored by public transportation agencies throughout the country range from a low of 30 percent to a high of 117 percent. The overall average of nine vanpool programs was 80 percent. Vanpools are also energy-efficient. Vanpools have the lowest British Thermal Unit (BTU) per passenger mile of transit modes and personal automobiles.

37. BRT in HOV lanes is not sustainable. At the 2+ vehicle-occupancy level HOV lanes become congested and travel time savings and trip time reliability to transit is lost. There may not be enough demand at a 3+ vehicle-occupancy level and an HOV lane may suffer from the empty-lane syndrome. There is no way to fine tune occupancy as you cannot have a 2.7 vehicle-occupancy requirement.

38. Value pricing offers precise control. The I-15 HOT lane uses quasi-real-time variable pricing. The 91 Express Lanes use a fine-tuned rate schedule, with periodic adjustments. The Express Lanes carry 49 percent of peak traffic with 33 percent of the lane capacity. Both facilities offer reliable high speeds during rush hours.

39. The virtual exclusive busway (VEB) concept would use value-priced lanes or networks. Pre-defined capacity would be reserved for buses and super-HOVs. The remaining capacity would be sold through value pricing.

40. An example of VEB capacity highlights how the concept would work. First, the capacity of a lane is approximately 1,700 vehicles per lane per hour. Second, space would be allocated for 60 buses per hour, which is the equivalent of 120 personal vehicles an hour. The remaining available capacity in the lane is 1,580 vehicles an hour. A percentage of this capacity would be allocated to vanpools and super-HOVs. The remaining capacity would be allocated to paying customers.

41. The managed lanes project on I-10 West in Houston provides a VEB prototype. The project represents a partnership among Houston

METRO, TxDOT, and HCTRA. The four new managed lanes in the center of the expanded freeway will use value pricing. HCTRA is helping fund the lanes and will operate them. METRO is guaranteed 65 buses an hour and 25 percent of capacity for buses and HOVs. A LOS C will be maintained using pricing and occupancy controls.

42. The I-10 West managed lanes highlight the benefits to transit of this approach. Although METRO will not receive any toll revenues, it will be able to operate 65 buses an hour, which is above current service levels. FTA approval was granted based on maintaining a LOS C. A 3+ occupancy requirement will be used for carpools to travel for free. All of these elements are covered in a MOU. A VEB can facilitate region-wide express bus/BRT service. A regional network would require construction of new lanes and flyovers. These major capital costs would be paid out of toll revenues.

43. A VEB network provides a cost-effective approach. The cost of a 500-lane-mile VEB network has been estimated at \$2 billion-to-\$3 billion in the Reason Foundation studies. In comparison, FTA data indicates the cost of a 250 route-mile light rail system is \$31 billion and the cost of a 250 route-mile heavy rail system is \$38 billion. In addition, the VEB guideway would not depend on FTA funding.

44. Managed lanes are being considered in a number of metropolitan areas through the country. Some changes in policies are needed for VEB networks. First, there must be clear FTA policy approving HOV to HOT conversions. Second, managed lanes need to be defined as "guideways" in Section 5302 of Title 49. Third, VEB or VEB networks need to be considered an alternative in new starts evaluations. Finally, VEBs should be made eligible for New Starts funding for buses, stations, and park-and-ride facilities.

45. Exclusive busways are key to competitive express bus/BRT. Exclusive busways are too costly and are wasteful of capacity. VEB is feasible with value pricing and with agency cooperation. VEB can provide a win-win situation for transit agencies, motorists, and state departments of transportation.

Section 5 Why buses are better

Please address each paragraph specifically, and explain why you agree or disagree.

1. There's a missing factor in the formula pushing a 5-billion dollar rail system into our suburbs, and this traffic solution is doomed to fail without it. The simple truth is that a rail transit system requires a dense residential pattern to make it work, which we do not have on Oahu. This crucial relationship between transportation and land use has not yet been properly addressed.

2. The often-cited description of Honolulu conjured up by rail proponents as a dense, linear city ideal for rail is a myth. Our biggest transit problem is that Oahu's settlement pattern of single-family homes in suburban subdivisions is too dispersed for rail to be effective. If we build the rail line and don't change the way we build new housing this system will be a colossal disaster. How many people right now live within walking distance of any likely stations? Not nearly enough to support rail rapid transit.

3. When you look around the world at successful rail transit systems you see they are in cities with medium and high density housing where people can walk to the station and then walk to their work place at the

other end. A global trend in city planning is creation of the urban village, both in the city center and in the fringes with construction of new towns. Such increased housing density could enhance quality of life by developing a village atmosphere and supporting our need for close-knit communities where people interact, unlike today's isolated neighborhoods. Shops, restaurants, entertainment, jobs, schools, mass transit, and other enjoyable urban amenities would be easily accessed in a more dense community if it is properly planned.

4. There is a causal relationship between our problems of unaffordable housing and congested traffic, because we have spent years building the wrong kind of homes in the wrong places, covering our landscape with big, expensive houses, generating suburban sprawl that has produced tremendous traffic problems. These unattended problems will only grow worse if we are distracted with an ineffective, fixed rail pipedream. Jumping into a rail commitment at this point is just not going to work.

5. Consider how someone living in a single-family suburban home would have to get to work on rail: walk to a bus stop, wait for the bus, ride to the rail, walk to the platform, wait, board, ride, walk from the rail to another bus stop, wait, board, ride, walk to work; then do the same thing in reverse going home. Who is going to put up with this? Most who are supporting rail probably would not ride it -- but hope in vain that others will, to make more room on the roads for the rest of us.

6. There are better transportation alternatives which could provide faster relief and perhaps eventually evolve into a rail system. One obvious strategy is to vastly expand our bus system. We need more buses, exclusive lanes, frequent service, additional routes, express lines, better connections and lower fares. Our present bus system is often claimed to be one of the nation's best, which is another myth that stands in the way of true solutions. It can be drastically improved.

7. Extensive road construction will be needed, including some elevated busways, bus stations,

8. underpasses at busy intersections, more use of contraflow and other management improvements. In the future, if bus utilization grows heavy enough, this system of elevated structures and exclusive bus lanes could be converted to rail, which would ultimately have more capacity; but it would be a mistake to attempt a transition directly to rail at this point when we are not yet ready.

9. Why not just build the rail now along with the higher density housing to go with it? That would be nice if we could trust the brilliance of our politicians and private land developers to do the right thing, but with their sorry record of land use planning we must not be gullible. This new kind of housing approach needs to be demonstrated with real results and in the meantime it can be supported with an expanded bus system which can evolve into rail transit.

10. Unfortunately, our misguided state legislature passed a flawed bill last session that prohibits expenditures of new transit revenues on road improvements. How can the city now tell us with a straight face that all transportation alternatives are currently being given fair consideration? This state legislation could be changed, but given past performance, the outlook is bleak.

11. Our former mayor was probably on the right track with his BRT plans using modern buses driving on exclusive lanes and circulating in existing

streets. A well-planned bus service could pick you up near home, bring you to a bus station where one transfer would put you on a bus that is going close to the final destination, riding on exclusive lanes that will be free from traffic. Commuters could also drive to transit stations at regional shopping malls, park for the day and catch an express bus direct to their destination. The whole island can benefit from this approach rather than one narrow leeward corridor. Another promising technology is creation of high-occupancy toll lanes, but the city studies are also ignoring this option.

12. At the same time we can be preparing ourselves for a future rail system by building new housing in well-planned, medium and high-density apartments -- which can be affordable and very beautiful when done right. Clustered villages can be created with a mix of townhouses and highrise apartments that could support neighborhood shopping, entertainment and other urban amenities. These clusters could be developed in the urban core as well as carefully-selected regions of the island. It can happen, but it will require a serious community dialogue and basic transformation in the way we build housing, requiring a prohibition on most new single-family houses and active government involvement in consolidating small private parcels for larger planned communities through aggressive use of eminent domain.

13. Let's not be railroaded into paying for a premature, expensive rail system that will take forever to build at great inconvenience and won't work. At this time and for the foreseeable future rail is a luxury that we are not ready for and cannot afford. Imagine ten years of disruptive construction for a massive elevated train that hardly anyone in our lifetimes is going to use, leaving the rest of us stuck in gridlock and our children permanently unable to find affordable housing. We can do better.

Section 6 Rail Will Fail: HOT Lanes are Better.

Please address each paragraph specifically, and explain why you agree or disagree.

1. ENVIRONMENT: An elevated train running through the heart of our city would be an environmental blight on Honolulu. Elevated tracks would be ugly, running through downtown and eventually Waikiki, defacing our beautiful city and damaging our tourist industry. The elevated guideway will destroy views for tourists and residents, along the way. Managed Lanes would also be elevated through part of the Leeward corridor to avoid the bottlenecks, but would come down to ground level in Iwilei before reaching downtown, and would not cross the heart of town as an elevated monster.

2. The city's own projection is for traffic to be far worse, with rail, than it is today, so since rail will not solve the problem, why should we pay for it, and what should we do instead? Yes, rail transit would have a dedicated right-of-way above the congested traffic, but so would the express bus system on a fixed guideway, or "HOT Lanes," (High-occupancy and toll lanes) which can operate far more efficiently at lower cost than rail, with a mix of express buses, carpools and toll-paying cars, providing faster service from many origins directly to many destinations. Reversible HOT Lanes would be far superior to rail for Oahu for all the following reasons.

3. EXPRESS: Buses can utilize a guideway better than rail because buses can pick people up in our dispersed communities and drive

directly onto the guideway, quickly reaching the destination non-stop and without transfer. Buses do not need stations on the guideway, for they would use regional bus stations that people could easily get to. Train stations will not have such versatile access and will not be close to our dispersed, existing residences.

4. SPEED: Trains stop at every station along the line, like riding an elevator up a 30-story building and stopping at every floor. The city's official speed estimate for Honolulu rail service is an average of 23 mph, which is far less than the 60 mph an express bus can expect on an exclusive elevated lane. Because of higher speed and fewer transfers, bus will attract more riders than rail and more effectively reduce traffic congestion. With this higher bus ridership, the cost per rider of bus would be lower than rail, which will undoubtedly fail to attract any large number of users.

5. TRANSFERS: Rail riders would have to transfer many times on the daily round-trip, as in this likely journey: a) travel from home to a bus stop, wait for the bus, b) ride the bus, c) walk from the bus to rail, wait for the train, d) ride the rail, e) walk from rail to bus, wait for the bus, f) ride the bus, g) walk to reach destination. Then returning, everything is in reverse: h) walk to bus stop, wait for bus, i) ride bus to rail, j) walk from bus to train, wait for train, k) ride train, l) walk from rail to bus, then wait for the bus, m) ride bus, n) travel from bus stop to home. (14 travel segments, including 4 transfers) Studies have shown that people hate to transfer.

6. CONGESTION: Rail service will do nothing to reduce traffic congestion: the city study shows that current over-capacity on H-1 peak hours is 6%, and by 2030 over capacity will be at 31% with the rail in place. Buses and vanpools on free-flowing HOT lanes could reduce traffic by 20-25 percent. The city's own studies show rail would only remove 2% of trips from the roads.

7. UTILIZATION: Extra space on the fixed guideway can be used by other vehicles, particularly vanpools and car-pools. If there is available space, some additional vehicles can pay tolls (collected electronically, without cars having to stop) and the tolls can pay for much or all of the transit system. The amount of traffic would be regulated to allow maximum capacity without congestion, enabling full utilization of the guideway space unlike rail, whose expensive tracks would be empty most of the time. We will get the most bang for our buck.

8. CAPACITY: Surprisingly, an exclusive bus lane can easily carry more passengers than a rail line. Five-hundred buses an hour, carrying 25,000 seated passengers, enter the New York City main bus station daily on one dedicated bus lane. The maximum capacity estimated for Honolulu's proposed rail is 10,000 people per hour. A good bus lane has a maximum capacity of 1,000 buses an hour, carrying 50,000 seated passengers! High-capacity busways on dedicated lanes operate in Newark, Los Angeles, San Diego, Washington, D.C., Curitiba, Bogota, Brisbane, Ottawa, Port-of-Spain and elsewhere, as this technology gains increasing traction.

9. UNIONS: Unionized rail workers can hold the city hostage as shown by recent metro strikes in Paris, London and New York. Bus unions don't have as much leverage because people can ride private buses, use carpools, pay tolls and still drive the HOT lanes. Rail service is provided by a monopoly, while a busway could carry buses of different

companies providing competitive service. Rail construction is by non-bid single-source contract, vulnerable to political manipulation, unlike road-building which is open to many bidders.

10. BREAKDOWNS: Busways can be built more quickly than rail and can readily be repaired in an emergency. Rail structures cannot rapidly be replaced or repaired if damaged. Buses and other vehicles can drive around a disabled bus. All trains come to a halt if there is a disabled train on the track. Busways-HOT can accommodate emergency vehicles and provide an evacuation/alternate route in the event of another September 5th "Black Tuesday" freeway closure.

11. COST: The price of constructing the rail system is astronomical, probably reaching \$6 billion by the time all the cost over-runs are paid for, compared with less than \$1 billion for elevated HOT Lanes, despite the city's absurd claim of nearly \$3 billion for "managed lanes." A similar system in Tampa was built for \$300 million. Rail would end up costing each family of four about \$24,000, even though only a few percent of the population would ever use it. We estimate construction cost per rider at \$120,000 with daily operational subsidy of \$15. The Federal Government Accountability Office has compared operating costs, and the majority of cities have lower operating costs for their Bus Rapid Transit systems than for their light rail systems. HOT Lanes also save money by making better of our existing streets as feeder lanes for high-capacity buses, plus we benefit from free labor and equipment supplied by drivers of HOV vehicles and toll-paying autos. Buses can be more easily replaced as technology improves. There are hybrid and natural gas buses whereas rail hogs electricity, involves large energy transmission losses and will require construction of a new electrical power plant.

12. QUALITY: Some people assume buses provide inferior service, but buses of any quality can readily be bought: Luxury buses can be offered for those who prefer to pay more, less-expensive ones for those who prefer to save money. The main quality consideration for commuters is the time it takes to make the journey -- buses are quicker and easier than rail, plus you are more likely to get a seat rather than stand.

13. TOLLS: Critics claim that toll roads set up a system geared to those who can afford the tolls, and ignore those who cannot. Federal surveys show that in the places with HOT lanes the public approves of them across all income groups. Those with lower incomes approve of them because a) it reduces traffic congestion on nearby freeways at no cost to those not using HOT lanes, and b) it provides reliability to make those important appointments, which we all have regardless of income. If you are running late, paying \$4 to jump on the HOT lanes and get there on time can easily be worth it. Without HOT Lanes, travelers will pay a toll anyway for a ticket if they ride a rail, or in wasted time if they drive stuck in congested freeway lanes. Affordable express bus service will be enhanced.

14. CARS: Some charge that HOT lanes encourage rather than discourage car use, but HOT lanes are not freeways and their toll charges do not encourage auto travel. Adding a lane will not increase the number of cars on the road, for that is controlled by the number of jobs at destinations -- just like adding a maternity hospital does not increase the number of babies, it just makes it easier for them to arrive. HOT Lanes are primarily mass transit for express buses and carpools,

which will lure drivers away from single-occupant cars.

15. DENSITY: Rail transit relies on high-density residential patterns to support it, with most riders living in high-rise apartments along the route, while the HOT lane can be easily reached by people living in more dispersed communities like we have on Oahu. Rail planners envision social engineering on a grand scale to force new housing into dense "TOD" patterns near stations (Transit Oriented Development). Such rail stations are magnets for crime. We do not have this density along the proposed route, nor do we have the population size. The smallest American city with heavy rail, Cleveland, has twice our population. Increased residential densities can make sense for the environment, but they can be better supported by a well-planned bus system that will allow more flexible distribution of settlements. In this way communities can grow in a natural way with different densities in various locations, increasing the opportunities for affordable housing and mixed-use neighborhoods with shops and jobs nearby, rather than congested housing along one narrow rail line. Rail lines are fixed and cannot respond to changes in employment and land use, whereas bus service can be rerouted and shifted over time to correspond with Oahu's changing transportation needs.

16. BIASED STUDIES: The city's Alternatives Analysis failed to provide any examination of the HOT Lane alternative, only vaguely considering "managed lanes" with a superficial and biased approach: The projected costs were grossly exaggerated, provided no access ramps along the route, included 6,200 unnecessary parking stalls, offered dubious ridership forecasts, had excessive \$6 toll, removed the existing HOV zipper lane, resulting in a net of only one new lane, and then added the burden of stations on the busway - but no stations are required.

17. POLITICS: Unfortunately the city administration is completely close-minded about this critical issue and is determined to push rail at all costs. The city administration's biased EIS process is giving no consideration to the HOT Lane option. The city has pretended to listen to the public with superficial community meetings, biased transit symposiums and rigged advisory panels, but all these phony efforts have been a farce that were selling rail and manipulating public opinion rather than honestly listening to alternative viewpoints.

Section 7 transit debate

Please address each paragraph specifically, and explain why you agree or disagree.

1. There is no room on the ground to relieve the Leeward situation -- if you don't accept elevated you are out of the discussion. Buses can utilize this guideway better than rail because: buses can pick people up in our dispersed communities and drive directly onto the guideway without transfer. An expanded bus system would utilize regional bus stations, mostly in existing shopping/parking areas, that people could get to by a) driving, b) walking, c) shuttle bus, d) bicycle or moped. Train stations will not have such versatile access modes, nor will they be as close to our dispersed, existing residences.

2. Modern, express 3-piece articulated buses can carry 150 people. Again, as below, it comes down to ridership -- the bus reaches out to more places so will attract more riders, rail will fail due to lack of

customers, so that rail driver who could be pulling 300 people is stuck on empty, especially in off-peak hours. Bicycles can be easily accommodated on board.

3. Oahu needs considerable provision of new services, based on regional bus stations people can reach as detailed above, and from those stations there will be express buses which drive in from the suburb mixed with reasonable traffic, then enter the guideway at the H1-H2 merge in Waipahu, flying over the congestion non-stop! Please look at the proposed travel times projected for rail-they are worse than driving through the congestion. Don't project current bus conditions into our future, which will be a much different system.

4. The express bus can reach town without stopping every mile at a station, 10 miles in 10 minutes, much faster than rail.---

5. These new buses will be a different mode altogether because they will have true express lanes, so don't compare it to the present situation. Bus = 10 minutes; rail = 60 minutes, Check the city's alternative analysis charts.

6. The biggest rail handicap is transfers. A) leave home, b) travel to rail by bus - no-one lives in walking distance of proposed stations, which will have no parking c) walk from bus to rail station d) ride rail e) depart rail station and probably transfer again to reach destination. Then in the afternoon, f) g) h) i) j) do the same things again to get home.-

7. The big problems are the walk, the climb, the walk, the wait, the walk, etc.

8. Cost difference is a major factor. \$6 billion for rail versus \$2 billion for bus guideway construction. Look to Tampa, which built a 6-mile 3-lane, elevated viaduct for 300 million last year. This is not rocket science. It is just possible that tolls could pay for the whole thing.

9. Many other communities are building HOT lanes for bus, vanpools and toll-paying cars, but comparisons with other places is very misleading and therefore, dangerous. While we can learn many general principles from studying other places, direct equation with cities such as Vancouver, which is often pointed to by our Council and Administration as a model for us, are inappropriate because we are unique and must deal with our special situation in our own way. For example, population in greater Vancouver metropolitan area is 2.1 million people and skyrocketing along at 6.5% annual growth, compared to .9 million in Honolulu, growing at only .7% annually. Furthermore, Vancouver is a leader in "smart growth" with major development of high density housing downtown to the point where nearly as many commuters leave downtown in the morning as arrive.

10. Operational costs that theoretically tip in favor of rail assume that rail succeeds in attracting customers, which I seriously doubt - whereas express buses can, and those bus service levels can be easily adjusted to meet demands, unlike rail where the empty trains must keep on rolling, throwing good money after bad.

11. The old BRT was a ridiculous plan, taking away existing lanes for buses from a city that already is last in the nation for lanes per-capita. BRT was preposterous. Don't compare our current proposals to Harris, or to anywhere else, Those arguments ring hollow and suggest you have no real case if you have to go after straw men.

12. Of course, you realize our electricity comes from fossil fuels, petroleum no less. The rail will be an energy hog, requiring power 20 hours every day. Bus and HOV vehicles are evolving as we speak, soon running on alternative fuels. BTU per-capita of rail versus car is surprisingly close, and with new technology, free-flowing autos will soon pass rail in efficiency -- and again, a well-planned bus system of the type we are suggesting will run energy circles around the empty train. When the bus or vehicle is not in use, zero energy and emissions. Rail, all the time, empty, stopped, or going, is burning and polluting.

13. In addition, there are many other arguments for a HOT lane guideway. It can be utilized by vanpools and carpools. It can also be used by cars paying tolls to help fund it, perhaps only in the early years while HOV occupancy builds. After 5 or 10 years, if HOV service demands, cars could be excluded, but in the meantime tolls have helped pay for the system. All these vehicles can be properly dispersed at the town end with adequate off-ramps and some new parking facilities (connected to work places by shuttle service).

14. Sensible urban planning can devise a settlement pattern of new housing built in medium densities, new towns, that will encourage use of bus transit. Rail, on the hand, would seem to require high-density, high-rise, air-conditioned, expensive, un-Hawaiian housing, the so-called TOD, transit oriented development, which has not been working out well in several mainland communities, including Portland.

15. Getting people to use rail requires major social engineering, changing people's behavior and housing preferences, which is nearly impossible. This new generation of rail riders would either have to live walking distance from a station, in expensive, high-density clusters, or get to the train via transfer, and transfer again at destination. The psychological cost of time spent during transfer is much higher than that of time spent sitting in a vehicle. Less social engineering is needed to get people onto an effective bus or vanpool system, because it can pick them up closer to existing homes and get them to destinations with fewer transfers. New housing of transit-friendly medium density will be more acceptable to people than air-conditioned, expensive, crowded skyscraper condos.

Section 8 City Myths on Rail Transit These are responses to public statements made by city officials:

Please address each paragraph specifically, and explain why you agree or disagree.

1. This memo presents a rebuttal to various incorrect statements made by Honolulu government officials about the supposed advantages of rail. Our basic complaint is that the city keeps claiming rail would better serve our community than alternatives, such as HOT Lanes (High Occupancy and Toll Lanes), using incorrect information that misleads the public.

2. Main myths "Rail, if you compare it to a busway or a bus system, is head and shoulders above something like that (busway) in terms of 1. speed, 2. capacity, 3. reliability, 4. safety, 5&6 capital cost, even, operating and maintenance costs, 7. pollution, there's no comparison, there's no comparison. 8. Honolulu needs to move, I would say, 200 to 300 thousand people a day and only one kind of system would do it and that's a high-speed, high-capacity, rail system and that is why I am so in

favor of it."

3. Speed? The city's alternatives analysis shows that for the 19 miles from Kapolei to Downtown it's going to take 65 minutes by train. That's 20 miles per hour. He's saying 19 miles in 65 minutes. The alternatives analysis, that's the official assessment of what it will take with the rail line. Trains stop at every station, which is like elevators in thirty-story buildings stopping at every floor. This makes the trains quite slow. For example, from Kapolei to Downtown, a distance of 19 miles, the journey by train is forecast by the City's Alternatives Analysis http://www.honolulutransit.com/more_info/library/files/Alternatives_Analysis_Chapter3_to_End.pdf (page 3-11) to take 49 minutes if you drive to the station or 65 minutes if you walk/bus to the station http://www.honolulutransit.com/more_info/library/files/Alternatives_Analysis_Chapter3_to_End.pdf. This agrees with federal government data showing urban transit trains averaging only 23.5 mph. There is no "whoosh" with trains. On the other hand, buses on uncongested High-Occupancy Toll (HOT) lanes will average 60 mph and then 15-20 mph in normal traffic. It does not take much of the journey to be done on the HOT lanes to get an average speed far higher than a train.

4. The capacity of the projected rail line is 6,000 riders per hour in the peak direction with an ability to expand that to 10,000 per hour maximum. We can compare that to New Jersey's I-495 single bus lane carrying 32,600 passengers per hour. In the face of that, it is ridiculous to discuss a two-lane HOT lanes facility, giving priority to buses, not having the capacity of a rail line. The Parson Corp. HOV Facilities Manual says of rail and busways that, "Both modes can serve the person carrying capacity needs of about any corridor in North America." During the non-peak hours there'll be too much capacity if it's a rail. You'll have a 300-person vehicle rumbling through mostly empty every 6-10 minutes, whereas a common express bus can be coming through using far less energy and even more frequently or less frequently, as needed. www.honolulutraffic.com/passperhour.htm

5. Myth 3: Reliability? The biggest problem with rail transit is strikes (and suicides). Strikes are a major headache for rail transit users in the mainland because every so often they go on strike. They'll be out days on end. It takes them so much longer to get ridership back up to where it was after a strike. If you were to put in a rail system, whatever union is controlling the train is going to have an immense amount of power over the city. When a rail car breaks down the entire system will cease functioning, perhaps for days, causing major inconvenience.

6. Myth 4: Safety? Gangs, graffiti and crime around train stations. It's a magnet for this kind of stuff. Safe? All rail systems have to have transit police. Vancouver, San Francisco, Washington, etc...rail systems have transit police. We don't have transit police on our bus system. Are police accounted for in the alternatives analysis as part of the budget? No, they're not mentioned. We've brought that up. It's an issue. It's expensive. When they put in the blue (rail) line in LA the eventual bill turned out to be millions of dollars a year to put in a sufficient transit police in place to hold the crime down.

7. Myth 5: Costs? Saying that the capital cost is less than the HOT lanes option (High Occupancy Toll) is also absurd. It's really laughable to say

that a simple, elevated highway built by the lowest bidder is going to cost more per mile than a non-bid, elevated rail line with trains, computers, transformer stations. Each station is 270 feet long, 50 feet wide with elevators, escalators, stairs and generators to pull the train to the closest station so that the people don't get stranded between stations in a power outage. There can be no comparison. How can they be so off on the cost? Well, they have consultants who boast about being cMythnt-focused. In other words, they'll do whatever the cMythnt wants them to do. And the cMythnt wants them to show that HOT lanes are not competitive with rail.

8. Myth 6: The city has exaggerated the cost for HOT lanes to \$2.6 BILLION. A comparable facility, the Tampa Expressway cost \$400 million. When you've got a facility built for 400 million you cannot justify one for 9 times that amount in Honolulu. The 400 million dollar one in Tampa - how long is it? About 12 miles but it's 3 lanes wide. The one that we propose is 2 lanes wide. The cost per mile of rail in Honolulu is estimated by the City to be the same as the Washington, D.C. Dulles extension. But the cost of a reversible expressway for HOT lanes is estimated by the City to be over five (5) times the actual built cost of an already built system in Tampa, Florida!

9. Myth 7: Pollution? When cars are traveling at uncongested speeds, the pollution emissions are far less than on congested freeways. Speed up the auto traffic and we will get far less pollution.

http://www.itre.ncsu.edu/ITREmain/research/documents/Emissions_Reduction-TrafficMngt.pdf

10. Efficient express buses that circulate in communities then drive onto HOT Lanes would attract more riders than rail, further reducing automobile usage and congestion.

11. Myth 8: 250,000 riders? Currently, 7% of Oahu trips are by public transit. This would need to triple, to 20% to reach 250,000 riders, which has never happened anywhere in the U.S. or Canada. Nationally transit ridership share has been going down, way down, not up. At present only about 75,000 people per day use transit.² It would mean increasing transit users by 300 percent when the population is only forecast to increase by 28 percent for 2005 to 2030. This means increasing transit's market share by 260 percent. Bearing in mind that no metro area in the country has increased the percentage of commuters using transit over any 20 years of Census taking Where is he getting his numbers? (ftp://ftp.abag.ca.gov/pub/mtc/census2000/JTW_Trends/PDF/FullReport.pdf) (p. 4-9).

12. Myth 9: Energy? "Rail is better in terms of the energy consumption." Well-managed HOT Lanes can have a lower "carbon footprint" generating less carbon dioxide, than rail. Bus riders will use a high-occupancy lane going non-stop at 60 mph. Cars on HOT lanes will go faster and take less time on the road. Cars on existing highways will benefit from reduced congestion. Everybody goes faster. Two HOT Lanes carry as many vehicles as four lanes of regular, congested traffic. HOT lanes do not get congested, so the traffic is free-flowing and more efficient. Energy use at 20mph is 25 percent greater than at 55-60 mph. See <http://www.fueleconomy.gov/feg/driveHabits.shtml> for U.S. Dept. of Energy data. Construction of the rail line and huge stations would take an immense amount of energy.

13. Myth 10: Electricity? All of Honolulu's electricity is generated by burning petroleum, by far the highest level in the country, and yet the city's cost estimates for rail do not even include the expense of building a new power plant, let alone plans for one that runs on some new, unnamed technology. Battery-powered cars in the future will be charged overnight when electricity costs are at a minimum, but rail would draw massive power during existing peak periods. The rail system will require huge amounts of electricity 20 hours every day, even if it is running empty. Each station will require its own emergency generator.

14. Myth 11: Vancouver Skytrain is running a profit. "Last year it made 2.72 million dollars."

A profit? Vancouver's Skytrain is integrated financially with their buses, ferries, and other elements of public transportation. Fare revenues for Skytrain cannot be calculated since one ticket allows transfers between trains and buses. Their financial report does not break out separate fare revenues for Skytrain. Total subsidies for Translink were \$236.7 million in 2006. Any talk of Skytrain making a profit is absurd.

15. Myth 12: in Vancouver "last year car usage decreased by 5 billion kilometers (because of Skytrain)." The number of automobiles is actually increasing by 20,000 per year. This automobile growth is creating gridlock on Greater Vancouver's road network, which has had no significant improvements since the 1980s. In Vancouver, rising congestion reduces quality of life and increases costs. Population has grown by 750,000 people in the Vancouver region over the past 20 years and is anticipated to grow to over three million by 2031. With a rapidly growing population twice our size, concentrated in well-planned urban densities, Vancouver makes a very poor comparison. Greater Vancouver residents consistently rate transportation as the number one issue in the region.

16. Myth 13: No bus system can recover all its costs. Where do we start? Buenos Aires' 15,000 buses are privately-owned and profitable. Atlantic City's 190 13-passenger buses are privately owned and profitable. Source.

<http://www.specialtyretail.net/issues/january99/acretail.htm> Not only are Hong Kong's buses profitable and so are those of the rest of China. Source. <http://www1.cei.gov.cn/ce/doc/cen3/200501201828.htm> Throughout Asia and South America profitable bus systems abound. It is only through political choice that our bus system is subsidized by \$140 million annually. In 1971 our bus system was profitable, but then the City took it over and began operating all kinds of unprofitable routes such as a trip completely around the island for \$2.

http://www.honolulutraffic.com/Pickrell_xv.pdf

17. Myth 14 "Let's take Pittsburgh. They did both, an elevated busway and a light rail system. They projected 50,000 passengers a day for the busway. Their actual ridership today after seven years is 9,500 - one fifth of what they projected." The Federal Transit Administration's website shows that Pittsburgh's busways carry 52,000 riders per day - more than twice as much as carried by light rail. Source:

http://www.fta.dot.gov/printer_friendly/research_4289.html

18. "For the light rail system they (Pittsburgh) projected 30,000 passengers. Last year it was up to 27,000 riders, up 9.4 percent from the year before. So people are actually moving from buses to rail."

19. Pittsburgh light rail makes its forecast? The official ridership forecast

was 90,500 riders per average weekday versus the actual ridership achieved of 30,600 - 66 percent less than forecast. Last year the riders were not up to 27,000 but rather down to 23,200, a significant decline from the 30,600 achieved in 1989. (Source: <http://www.apta.com/research/stats/ridership/riderep/documents/06q4lr.pdf>) National Transit Data Program. If we review the disaggregated ridership data for Pittsburgh from 1996, the earliest available from APTA, to 2004, the last official data, we find that bus ridership declined slightly less than rail ridership during this period. More importantly, the U.S. Census shows that in 1980, before Pittsburgh built its new rail lines and busways, 106,200 Pittsburgh workers commuted using public transportation. That declined to 65,500 by the 2000 Census. This data is contained in the U.S. Department of Transportation report, Urban Rail Transit Projects: Forecast versus Actual Ridership and Cost (DOT-T-91-04), which shows the forecast (Source: National Transit Data Program at <http://www.apta.com/research/stats/ridership/riderep/documents/06q4lr.pdf>) As for busways: Source: http://www.fta.dot.gov/printer_friendly/research_4289.html Moving from buses to rail? Source: <http://www.apta.com/research/stats/ridership/> Source: Journey to Work Trends in the U.S. & its Major Metropolitan Areas. (FHWA-EP-03-058) page 4-9.

20. Myth 16: "the public transit use is actually a 30% increase since 1995"

21. But the broad picture, according to U.S. Census data, shows that from 1990 to 2000 there was a decline in people using transit to commute.

22. Myth 17: "We think the new (rail) riders is gonna be in the neighborhood of 30-40,000 riders."

23. This claim is based on ridership forecast by the consulting firm, Parsons Brinkerhoff, whose previous forecast for Honolulu were wildly inaccurate, grossly overestimating increases in bus riders when in reality we have seen ridership decreases.

24. Myth 18: There is a balance of spending for various transportation projects in the coming decades: "we're going to be spending about 3 1/2 billion dollars in the next 25 years on highway improvements as well."

25. But what kind of balance is this, spending nearly 200% more (\$6 Billion) for a rail project that might carry at best 10% of our riders?

26. Myth 19: "We're projecting in some areas commute times to increase to three hours one-way."

27. This is another scare tactic. The city's own Alternative Analysis shows that the worst commute in the year 2030 if nothing is done, the no-build option, from Waianae to UH Manoa, would be 105 minutes, 40% less than Okino's preposterous statement.

28. Myth 20: "In 1990 we did a...study which shows that even with a busway you'd have 60% of the people transferring....It doesn't reduce transfers, it doesn't reduce transfers."

29. This is another red herring. The 1990 busway survey was done as part of the EIS for the 1992 rail proposal, so again, the mayor talked to his myth-focused planning company and told them to make rail look good and buses look bad. They came up with a grossly-over engineered busway designed with elevated stations on it and no ramps

coming down to the ground, so of course riders would have to transfer in such a poorly-designed system. But there is no need for bus stations up on an elevated busway. Instead, these bus stations belong in the community at ground level, perhaps at existing shopping centers and other busy gathering spots. One of the great advantages of an express bus system is that it will take riders from origin to destination with few if any transfers.

30. Myth 21: Busways studied. Unfortunately the city has never included adequate busway ramps in its biased alternative analysis, yet has the nerve to criticize an engineer who has done such studies. Ramps are an important issue that illustrate the advantage of HOT lanes over the railroad. Ramps along a guideway allow buses to drive on or off and directly bring passengers where they are going without a transfer.

BEYOND THE MYTHS: PROBLEMS WITH PROCESS and PRELIMINARY ENGINEERING:

31. The city administration is following dangerous, backwards planning techniques by proceeding with Preliminary Engineering before the technology has been chosen and before the Environmental Impact Study has been done. Early in the process the Locally Preferred Alternative was determined by the City Council to be a "Fixed Guideway" without specifying what technology will travel on the guideway. It could be express bus, as some Councilmembers are advocating, or rail, or something else.

32. The city's planning procedure is essentially backwards, conducting preliminary engineering before the EIS is done. Why did we spend millions on preliminary engineering before the environmental impact statement is approved? We are spending a lot of public money without really knowing what the system is and if the system fits. The normal next step after the alternative analysis, which has been partly concluded, is the EIS. Once you have an EIS that is approved and signed by the Governor, the Mayor and the Federal government, then you go into preliminary engineering. If for some reason we reject the EIS, the preliminary engineering could be useless. Thrown out the window.

33. All of the above present serious concerns for Oahu taxpayers, who deserve true information, because we are the ones who would pay for it -- the largest public project in the history of Hawaii by far, costing the typical family of four about \$24,000 to build and many more dollars to operate and maintain. Unfortunately the proposed rail would do little if anything to solve our traffic problems, but there are much better options. Contrary to what the Mayor publicly declares, rail is not a "done deal."

34. Our position is that we should instead build a new elevated structure for HOT lanes from the Leeward side that would be used by a mix of express buses and carpools that ride free, along with some toll-paying automobiles. The city has consistently failed to study HOT Lanes as an alternative, despite their many advantages, which include lower costs and much more efficiency than rail.

Section 9 Rail Transit Daily Journey Segments

Please address each statement specifically, and explain why you agree or disagree.

1. TRAIN TRANSFERS and WAITING: Transit studies have shown that people hate to transfer and wait. Rail riders would have to transfer

many times and stand around waiting on their daily round-trip, which would typically need 20 total daily segments:

2. go to a bus stop
3. wait for the bus
4. ride a bus to the rail
5. walk to the platform
6. wait for train
7. ride the rail making many stops
8. walk from the rail to another bus stop
9. wait
10. ride a bus
11. walk to work;

a. same problems coming home.

12. Even if we grant that some commuters can walk to work from the end station, they still require 14 daily segments.

13. Those workers using a spur line to the airport will still have 20 segments in this typical scenario: add to the 14 segments above the 6 extra r/t segments for an airport worker on the newly-proposed spur: 1) walk to connecting train 2) wait for train (up to 15 minutes wait) 3) ride train, same in reverse.

14. On the other hand, express bus riders do not need many segments: Travel to a regional bus station, wait, ride non-stop to destination, walk to work. 4 components, same coming home.

15. Regarding tourist use of rail: what tourist would ever haul their baggage so far -- to a train, walk a few blocks in a shopping mall to transfer to some trolley, then walk several blocks in Waikiki to their hotel? This mayor is spinning a fantasy right out of Alice in Wonderland. Section 10 Please address each paragraph specifically, and explain why you agree or disagree.

Busway systems have the following advantages:

1. Buses do not need stations on the busway, as they can collect and deposit

passengers close the origins and destinations of their trips, without passengers having to change modes.

2. Space between buses can be used by other vehicles, particularly taxis and

car-pools. If these vehicles pay tolls (which can be collected electronically,

without cars having to stop) the tolls can pay for much or all of the transit

system.

3. Rail service is provided by a monopoly, generally unionized. A busway can

carry buses of different companies providing competitive service. That unionized rail staff can cause problems is evident from the current rail strike in Paris.

4. Bus systems have superior carrying capacity. Five-hundred buses an hour,

carrying 25,000 seated passengers, enter the New York City main bus station

daily on one dedicated bus lane. And a good traffic lane can accommodate over

1,000 buses an hour, carrying 50,000 seated passengers! Rail services

cannot

accommodate such high traffic volumes without forcing passengers to stand.

5. Rail services generally stop at each station along the line. Buses utilizing a busway can travel non-stop from passenger origin to destination.

This gives bus service a superiority in door-to-door speed.

6. Busways are robust and can quickly be repaired in an emergency.

Rail

structures cannot quickly be replaced or repaired if damaged.

7. The main disadvantage of all-bus systems is their low cost, so people assume

they give inferior service. But buses of any quality can readily be bought: Luxury buses for those who prefer to pay for luxury, less-expensive ones

for those who prefer to save money. High-capacity busways on

dedicated lanes

operate in Curitiba, Bogota, Brisbane, Ottawa, and Port-of-Spain.

Section 11 Comparisons

Please address each paragraph specifically, and explain why you agree or disagree.

HOT Lanes

Rail

DESCRIPTION

1. 10 mile, elevated 3-lane, reversible, high occupancy highway from the H1-H2 merge to the Iwilei edge of downtown, for express bus, carpool and some toll-paying cars.

2. 28-mile elevated train running from Kapolei eventually to UH Manoa, with 25 stations, some of them 80 feet above ground.

COST

3. Less than \$1 billion. Some of this will be paid by the federal government, some by tolls, with less than half by taxpayers.

4. More than \$6 billion. This amounts to \$24,000 for each family of four on Oahu. There is no guarantee of federal funds.

TRAFFIC CONGESTION

5. HOT Lanes will reduce congestion on H1 by up to 35%. Many drivers will use the new lanes and more commuters will be attracted by high-speed express buses.

6. City official studies show that future traffic congestion with rail will be far worse than it is today, increasing from the current 15% overload to 80% in 2030.

ENERGY SAVINGS

7. HOT Lanes will be more efficient, reducing traffic congestion and energy consumption, encouraging ridership in energy-saving carpools and express buses. New cars will get much better mileage, while the train will never improve.

8. Rail transit uses more energy per passenger mile than the average automobile according to the U.S. Dept. of Energy. For most of the 20 hours a day they run, trains are nearly empty. With rail, autos will be stuck in gridlock, wasting gas.

ENVIRONMENT

9. HOT Lanes would only extend for 10 miles along existing highways, such as Kamehameha Highway in Aiea and Nimitz Highway, not through residential neighborhoods.

10. An elevated train would be an ugly, noisy intrusion running for 34 miles through our neighborhoods (imagine elevated tracks down Kuhio Ave, ruining Waikiki).

RIDERSHIP & CAPACITY

11. An expanded express bus system would attract many more riders. Total passenger capacity would be at least twice as high as rail.

12. With rail transit ridership will only increase by 2%. This is a ridiculously small increase, costing us about \$600,000 for each new rider.

CONVENIENCE

13. Express bus riders: 1) Travel to a regional bus station, 2) wait, 3) ride non-stop to destination (avg speed 50 mph), 4) walk to work. Same coming home. Commuters in cars and carpools would have total convenience and personal control over their daily travels.

14. Rail riders would need up to 20 daily journey segments: 1) go from home to bus stop 2) wait for bus 3) ride bus to rail 4) walk to platform 5) wait for train 6) ride rail making many stops 7) walk from rail to bus stop 8) wait 9) ride bus 10) walk to work; 11-20) same coming home.

LAND DEVELOPMENT

15. HOT Lanes support expanded bus mass transit that will encourage good land use planning with low-rise, medium density communities that would be efficient and very livable. At the same time these lanes provide support for existing housing on most of Oahu, not just a narrow concentrated corridor where few people currently live.

16. Rail will supposedly create high density development around stations, protecting the rest of the island. Such utopian schemes have not been happening with mainland rail systems, and even if they did occur, do we want to force our future population to live in high-rise, air-conditioned buildings crowded along a Leeward corridor?

TAX INCREASE

17. No further tax hikes. \$1 billion for HOT Lanes will be paid by a combination of federal funds, tolls, and some local taxes, much less than public funds for rail.

18. The recent 1/2 percent excise tax increase will not be nearly enough to pay these huge bills, so property taxes will likely increase by 40% and more.

Section 12 The city's Alternative Analysis of Managed Lanes was faulty in several serious ways:

Please address each statement specifically, and explain why you agree or disagree.

-The city estimated Managed Lanes would cost \$2.6 Billion despite the fact that a similar system was built in Tampa Bay for \$320 million in 2005.

-They removed the existing zipper lane, resulting in a net gain of just one new lane rather than the 2 or 3 lanes we are proposing.

-They included bus stations on the lanes, which are totally unnecessary and would add considerable expense.

-They failed to include access ramps along the route so vehicles can enter and exit. Instead they just dropped all the vehicles to street level downtown at a traffic light with no management plan.

Section 13 cost in other places

Please address each statement specifically, and explain why you agree or disagree.

How can you justify such high costs compared to other places?

Light rail costs in comparison to population size in various metro areas:

Cost	population	Per capita cost
Dallas \$1,067,000,000	5,222,000	\$204
Denver \$358,000,000	2,582,000	\$139
Portland \$1,643,000,000	2,265,000	\$725
Sacramento \$307,000,000	1,797,000	\$171
Salt Lake \$376,000,000	1,334,000	\$282
St. Louis \$464,000,000	2,604,000	\$178
Pittsburgh \$1,051,000,000	2,571,000	\$409
Honolulu \$6,400,000,000	940,000	\$6,809

We would be the smallest metro area with a rail line and the most expensive. Portland spent the money, has bad congestion, running rail on what had been roads and existing rail beds, and still only 30% of their transit riders use rail the rest are in buses. Share of transit ridership in Portland remained flat from 1980 to 2000.

Section 14 Best Traffic Fix

Please address each paragraph specifically, and explain why you agree or disagree.

1. Traffic congestion for Leeward drivers is so horrible that people are desperate for anything that sounds like a solution. Rail has been pushed so hard and so often by the city that it seems like it should work, but unfortunately, rail would do next to nothing to solve the problem while wasting our precious resources. Here are some highlights of the major alternative to rail, which has received very little coverage in the media.
2. The best solution both to solve the traffic problem and encourage extensive use of mass transit is to construct a ten-mile elevated guideway for express buses, carpools, and perhaps some toll-paying cars. This guideway would leapfrog over the current choke-point between the Leeward bottleneck created at the H1-H2 merge and downtown, and it would come down to street level in Iwilei, not run through the heart of our city as an elevated blight like rail. It would provide a simple, elegant solution, cost under \$1 billion and likely produce a 35% reduction in traffic while transporting many more people than a rail line.
3. Managed lanes, also called HOT Lanes, will not dump more cars into downtown as rail-supporters falsely claim, because the main focus is bus and carpool, thereby reducing auto traffic, with several ramps along the route that distribute vehicles to destinations other than downtown. With this bypass, existing streets can handle the added express buses.
4. This approach would be better and conserve more energy than a train for several reasons:

5. Rail is an energy hog, with energy consumption per passenger about the same as the average new car, based on studies by the federal government. (for more details see our web site: www.stoprailnow.com)
6. Cars and buses are becoming increasingly energy efficient, soon to run on batteries that will be inexpensively recharged overnight when electrical demand is low, while rail is an old technology already at its maximum energy efficiency level and will place heavy demand on electricity during peak periods.
7. HOT lanes will produce tremendous improvements in the bus system at a fraction of the cost of rail, result in a much greater use of mass transit, take cars off the road and benefit everyone.
8. An expanded bus system makes better use of the existing 500 bus stops and adds true express service for ALL COMMUNITIES, while encouraging environmentally-friendly, medium-density development.
9. These lanes do not need to run elevated for 30 miles through the heart of downtown, Waikiki and residential neighborhoods, so they will not create urban blight like rail would.
10. Any commuter on this island could easily travel a short distance to an express bus stop and board a modern vehicle (not today's bus) that features comfortable seats, wi-fi, coffee service, and most importantly, rapid, non-stop delivery to destinations. This efficiency and flexibility cannot be achieved with a rigid, linear rail line going to Kapolei. Leeward commuters will benefit most of all from this express bus system, reaching town in 30 minutes instead of the 60-minute rail journey requiring multiple transfers.
11. An enhanced bus system would benefit everybody except lobbyists for the construction industry and land-development. How often have we heard about the tremendous financial gains that will result from concentrated development around train stations, along with the massive up-zoning for high-density apartments that most of us don't want to live in?
12. The people of Oahu share common ground with our organization: we want to reduce congestion, encourage mass transit, make other traffic improvements and encourage wise land use development with adequate housing for our future needs. Rail contributes nothing to our common needs, hopes and dreams.
13. Rail would be too expensive, not effective, ugly, and prevent us from developing real solutions. Rail would increase the number of commuters using transit by only 1.3% while morning congestion on H-1 will grow 53% in the next 20 years, according to the city's own studies reported by Sean Hao (Adv. 7/15). With a likely \$6 billion price tag, that pencils out to an expense of nearly \$750,000 for EACH new transit rider, costing every Oahu family of four about \$24,000.
14. In addition, rail would directly serve only the tiny fraction of Oahu's population that is within walking distance from its few proposed Leeward stations -- neighborhoods which currently are sparsely populated. Why does rail have public support at all? Well, the city has been spending millions of dollars for propaganda to mislead the public, leaving us largely uninformed about the pitfalls of rail or the advantages of non-rail alternatives.
15. We are all too familiar with the dilemma: thousands of commuters heading into the sun each morning on the H-1 which is full. And then again, in the afternoon heading back into the sun on H-1 which is full. It

is frustrating, it wastes gas and time every day. West Oahu and Central Oahu cannot be served by one freeway which is already full at rush hour. If this freeway is blocked, there are no alternatives. What about our ambulances, civil defense vehicles, and all the commercial vehicles that are also stuck?

16. New elevated lanes address these problems. It is a pity that rail does not.

-end-

Reply Requested :

Yes

Submission Type :

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FOIA (Freedom of Information Request) Request :

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FOIA Response Date :

RECORD # 522 DETAILS

Status : Initial Action Needed
Creation Date : 2/6/2009
Creator Affiliation :
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Business/Organization :
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Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 96744
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 02/06/2009
Submission Content/Notes : We can't afford rail at this time. I am totally opposed to it.
Reply Requested :
Submission Type : Comment/Suggestion
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 523 DETAILS

Status : Initial Action Needed
Creation Date : 2/6/2009
Creator Affiliation :
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Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 02/06/2009
Submission Content/Notes : Elevated steel on steel is a bad choice. It will be an eyesore. It's too expensive. Please, wait a decade and see what the world is like; then we'll see about rail.
Reply Requested : Yes
Submission Type : Comment/Suggestion
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 524 DETAILS

Status : Initial Action Needed
Creation Date : 2/6/2009
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Telephone Extension :
Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 02/06/2009
Submission Content/Notes : I am against the rail project. It will be noisy and disruptive, not nearly flexible enough if needs change (unlike buses) and way too expensive at a time when basic services are being cut.
Reply Requested :
Submission Type : Comment/Suggestion
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 525 DETAILS

Status : Initial Action Needed
Creation Date : 2/6/2009
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Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 02/06/2009

Submission Content/Notes : COMMENTS ON HONOLULU'S MASS TRANSIT DRAFT EIS
February 6, 2009

The Draft EIS has several glaring deficiencies. Some of them are:

- A. Too many stations, many of them amateurishly placed two or less blocks from each other.
- B. No public restrooms are shown in the proposed station drawings nor are there any shown cost provisions in the budget section to adequately maintain the necessary public restrooms.
- C. Lack of any mention of security provisions and costs at stations.
- D. No provision in the stations for a by-pass line for EXPRESS trains.
- E. Noise levels of steel wheeled technology in upper floors of towers missing.
- F. Noise levels and properties impacted along the Project Corridor in Convention Center, Waikiki and UH areas is missing.
- G. Visually sensitive Viewpoints within Project Corridor for Convention Center, Waikiki and UH areas missing or what is shown is totally deceptive and unacceptable.
- H. Park and Ride facilities are too small and missing for Ala Moana Area.
- I. Dillingham Blvd Project Corridor unworkable as it fails to consider equipment space needed by HECO to maintain very tall HECO Transmission Power lines.
- J. EIS fails to consider the possibility of using the large room in the area of the track's support structure-bridge as a revenue producing area to place urban utilities.
- K. Locations of Potential Impacts to Ongoing Hazardous Materials Operations missing discussion of Convention Center, Waikiki and UH areas.
- L. Historic Properties in areas of Convention Center, Waikiki and UH not covered.
- M. Alternative Routings to avoid Historic Properties does not cover areas around Convention Center, Waikiki and UH.

A. TOO MANY STATIONS, MANY OF THEM AMATEURISHLY PLACED FOUR OR LESS BLOCKS FROM EACH OTHER.

The stations are placed too close together. Professionally designed mass transit systems locate their stations 1.5 to 3 to 4 miles apart. For example, the proposed Chinatown and Downtown and Civic Center Stations are all located within 6 blocks, all three of them! This is absurd. One MAJOR Station for this compact area will be more than sufficient (at least initially – until more funds become available for all the unnecessary extra stations. People will walk blocks if they know that they are going to get a fast ride home. This might get some of those very obese people to start walking a short distance everyday and improve their health.

Station construction costs are the highest cost items per unit in the project.

Honolulu needs the entire system built including Waikiki and UH to gain

any relief from gridlock on the freeway, and if the number of stations – initially – are limited to 10 MAJOR Stations, there will be enough in the proposed budget to build the entire line.

Page 2-24 in the Draft EIS discusses the bus system “modified to coordinate with fixed Guideway System . . . certain local routes would be rerouted . . . as feeder buses to provide frequent and reliable connections to the nearest fixed guideway station.”

And, continues on page 2-36, “Enhanced bus service between the Terminal Stations.”

Eliminate the ‘nice to have’ proposed stations and build the 10 ‘must have’ stations, at least initially.

B. No public restrooms shown in the proposed stations nor cost provisions to adequately maintain them.

Draft EIS, page 2-22, Figure 2-11 and Figure 2-12 show platform station configurations with a concourse. No restroom facilities are shown. Restrooms in each station are a must for the numbers of people using this system. There seems to be no consideration in the financial section for the professional maintenance and up keep of these many public restrooms.

C. Lack of any mention of security provisions and costs at stations.

There is no mention of the security needs for each station, nor the costs of maintaining security at each station (another reason to limit the number of stations).

D. No provision in the stations for a by-pass line for EXPRESS trains.

Figures 2-11 and 2-12 show no provision for a center ‘by-pass’ track for EXPRESS trains.

E. Noise levels of steel wheeled technology in upper floors of towers missing.

There is no discussion on how much the three foot high barriers are going to AMPLIFY the noise of the steel wheels of the trains and reflect this AMPLIFIED noise upwards to thousands of residents in towers the Glideway passes. This is needed.

F. Noise levels and properties impacted along the Project Corridor in Convention Center, Waikiki and UH areas is missing.

Noise levels in the areas of the Convention Center, Waikiki and UH are totally missing. These must be added to the EIS. See Table 4-16 on page 4-100.

G. Visually sensitive Viewpoints within Project Corridor for Convention Center, Waikiki and UH areas missing or what is shown is totally

deceptive and unacceptable.

Visually sensitive Viewpoints within Project Corridor for Convention Center, Waikiki and UH areas missing or what is shown is totally deceptive and unacceptable, see Figure 4-16.

H. Park and Ride facilities are too small and missing for Ala Moana Area.

Park and Ride facilities along the entire proposed Corridor are too small or are missing altogether – Ala Moana, Convention Center, Waikiki, UH area stations.

I. Dillingham Blvd Project Corridor unworkable as it fails to consider equipment space needed by HECO to maintain very tall HECO Transmission Power lines.

On page 4-63, Table 4-10, HECO's high power transmission lines along Dillingham Blvd are mentioned but there is no discussion there or any where else in the Draft EIS on the problem HECO will have servicing those lines as the Projects Guideway is in the way of the mechanical lifts HECO uses to lift workers up to maintain these very tall poles and power lines.

This Table 4-10 also fails to show the potential Visual Effects of View lines at Ala Moana, Convention Center, Waikiki and UH. These areas must be shown too.

J. EIS fails to consider the possibility of using the large room in the area of the track's support structure-bridge as a revenue producing area to place urban utilities.

Page 2-20, Figures 2-11, and 2-12 show cross sections of the proposed Guideway structure and station configurations. Under the top of the guideway's support structure, as shown in the drawings, which top supports the train tracks, is a room - inside the support structure - which room could easily be divided up lengthwise and leased. The leases could be to:

- ? HECO for High Power Transmission Lines into Waikiki,
- ? Honolulu Department of Environmental Services for back-up force mains, and also
- ? phone and
- ? Cable transmission lines.

These leases would provide extra income to build and maintain the Guideway System.

Putting the community's utilities in the Guideway's support room would save the utilities huge construction costs of digging up our streets for years to put all these new and necessary utilities underground. Those savings could be put into the building costs of the Guideway System.

By doing this the community would greatly benefit by not having our

streets and roads dug up for years to lay all these new under ground utilities.

K. Locations of Potential Impacts to Ongoing Hazardous Materials Operations missing discussion of Convention Center, Waikiki and UH areas.

Figure 4-43 doesn't show any discussion for the Convention Center, Waikiki and UH areas. This must be included.

L. Historic Properties in areas of Convention Center, Waikiki and UH not covered.

These areas must be included in this discussion.

M. Alternative Routings to avoid Historic Properties does not cover areas around Convention Center, Waikiki and UH.

These areas must be included in this discussion in the Draft EIS.

Thank you for your consideration of these important topics and omissions in the proposed Draft EIS for this Project. If you have any questions please call me at 949-2497.

Robert Rodman

Yes

Draft EIS Comment

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 526 DETAILS

Status : Initial Action Needed
Creation Date : 2/6/2009
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Add to Mailing List : Both
Submission Method : Website
Other Submission Method :
Submission Date : 02/06/2009

Submission Content/Notes : Note, this is a revision to correct a typo on the copy I sent in several hours ago.

February 6, 2009

Subject: Comments on the Draft EIS for HHCTC Project

To:

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

and to:

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

These comments to the DEIS are my own informed opinion based on a long association with this project as a consultant for Itochu International Inc. Full disclosure, I am employed by this proponent for the HSST Urban Magnetic Levitation Train. These are my comments and not the comments of Itochu International Inc. or any associated company. When I first visited Mr. Toru Hamayasu in early 2007 the City plan was to have an open performance specification that would not be for any one technology, and allow technology suppliers and possibly turnkey teams to bid competitive systems. This was an attractive approach and many suppliers, Steel Wheel on Steel Rail, Rubber Tire on Concrete, Monorail and Maglev were interested.

The DEIS includes a short report of the technology selection panel. Before this panel was selected, the Mayor made up his mind that he favored SWSR technology. From that point on, the whole process was arranged and the public "outreach" was co-opted to promote the Mayor's choice.

The candidates and members of the panel were handpicked by the Mayor's management consultants. A requirement was added that the technology had to be limited to one type of fixed guideway technology to insure competitive proposals. This was not necessary if the City allowed different technologies to compete against each other. The panel met only once before a decision was made, and no meaningful discussion was allowed under the pretext of freedom of information and open public information. Instead of scheduling meetings, the panel made quick recommendations, and even before the recommendations were made, the Mayor's consultants were writing the recommendation, and extracting a few bullets from the panel's notes to present to the public. The panel was loaded with Steel Wheel proponents and even with people that had conflicts working for and with SWSR proponents. In our case, the panel did not understand or know the maglev technology being proposed and confused it with other high speed maglev technologies.

The "outreach" program was diverted to support the SWSR selection and more than \$2 Million of public money was spent promoting the SWSR decision, even before the City Council deadlocked on approving the technology choice. Instead of resolving this City Council impasse

with more information or opening the competition, the Mayor and City pressed on with SWSR to make the scheduled imposed by the Mayor. This "outreach" program continued through the election and public vote on technology.

My major objection to the DEIS is this is supposed to be an environmental impact statement of the transit system. The technology is the most important decision regarding this impact. If the technology is limited to SWSR, as it has in this study document, then the public and taxpayers do not get a proper assessment of alternatives, only the comparison made against buses and HOV lanes.

This study does not evaluate and study the possible benefits of lower noise, smaller guideway footprint, and lower maintenance cost possible with a system such as our HSST Urban maglev. This can also be said to some extent for a Monorail and for Rubber Tired systems. The City invited suppliers to compete and did not do a proper job in evaluating the environmental impact within this document.

As I write this the City has already solicited bids for the first guideway section for the SWSR system, again without the benefit of a final EIS. It is disappointing that the Oahu residents and taxpayers will not get the best system. The taxpayer will pay more for this system than they would if the technology was open for competition, even if the final decision was SWSR. The public deserves to see a complete environmental comparison.

Sincerely,
Frank Latino
Representative for and Consultant to
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Yes

Draft EIS Comment

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

RECORD # 527 DETAILS

Status : Initial Action Needed
Creation Date : 2/6/2009
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Telephone Extension :
Add to Mailing List : Email
Submission Method : Website
Other Submission Method :
Submission Date : 02/06/2009
Submission Content/Notes : We are concerned about the impact construction will have on our
Kapalama Branch located at 1535 Dillingham Blvd.

1. How will the construction impact traffic along Dillingham Blvd.? Will construction be phased to close one lane at a time thus creating traffic bottle necks?
2. During construction, we are concerned egress into our facility will be compromised.
3. We are concerned about the construction noise, dust and heavy equipment vibrations during business hours. We understand the street will be a construction site, however we need to conduct business in a business like fashion and not have to raise our voices to be heard by our customers.
4. Will there be road closures during normal business hours?
5. Is night work a consideration?
6. Will portions of the property need to be condemned or encroached upon to allow the rail structure?
7. How will the project phasing be communicated to affected businesses? Will we receive prior notification of critical work that will impact our foot and vehicular traffic?
8. After completion of the project will visibility to our facility be compromised? We rely on street visibility of signage and placements of vertical support structures may block visibility.

Reply Requested : Yes

RECORD # 528 DETAILS

Status : Initial Action Needed
Creation Date : 2/6/2009
Creator Affiliation :
First Name : Kim
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Telephone Extension :
Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 02/06/2009

Submission Content/Notes : Aloha:

Thank you for the opportunity to comment.

Along the proposed rail route, 62% of Oahu's population in 2000 according to the DEIS Table 1-5 is concentrated between Kaimuki-Waialae and Salt Lake-Aliamanu. The route could be nearly half as long and still accommodate the majority of the current population in the project corridor.

Presumably, the second half of the proposed rail route (Pearl City-Aiea to Kapolei) is justified based on the anticipated population growth between now and year 2030. If growth predictions shown in Table 1-5 are correct, 53% of Oahu's population along the proposed rail route will be concentrated between Kaimuki-Waialae and Salt-Lake Aliamanu. Therefore, even though the population in the Pearl City-Aiea to Kapolei area is projected to increase by about 70% over the current population in this area by 2030, the majority of people in the project corridor will still be concentrated between Kaimuki-Waialae and Salt Lake-Aliamanu. It is therefore illogical to nearly double the rail route to accommodate less than half of the projected population in the project corridor, much of which hinges on proposed developments that do not yet currently exist.

These proposed developments are likely to exist at least partially on agricultural lands – even prime agricultural lands. Constructing this rail transit system on agricultural lands (prime, unique, or of statewide importance, or otherwise), through agricultural lands to serve developments that are built on agricultural lands is not sustainable or in the best long-term interest of Oahu's people.

Prime, unique, and statewide important lands are, by definition, of agricultural importance. Land with such classification is significant, not negligible, regardless of acreage. To trivialize the absorption of such lands on the grounds that only a small amount of it will be sacrificed is not acceptable. Conversion of land with such classification is, according to the ALISH system that defines these classifications, irreversible and therefore not a decision that should be taken lightly or trivialized because of scale. Any final EIS must provide measures to adequately mitigate the loss (88 acres of prime, unique, or statewide important lands will be acquired by the Build Alternatives) of such important lands.

According to the 2002 Census of Agriculture (USDA 2004) that the DEIS cites, only 18% of land on Oahu is farmland compared to over 30% of land on each of the main outer islands in Hawaii. Land available and suitable for farming on Oahu is dwindling. Subtracting another 88 acres will not help Oahu's food independence and is not so insignificant that it can be ignored.

Even if 88 acres represents a small percentage of agricultural land on Oahu, converting prime agricultural land to urban development further confirms that we are okay with rezoning productive land arbitrarily. Prime agricultural land should be staunchly reserved for agriculture. Zoning changes should have a scientific, not political, basis. If we continue to

indulge the perception that rezoning relatively small quantities of agricultural land for development is insignificant, eventually there will be no agricultural land left to rezone. There is nothing negligible about that in terms of loss of biodiversity and food security.

On her website, Governor Lingle states:

"Hawai'i produces only 15 percent of its own food. That's not acceptable and shouldn't be for the State. We need to take action now to increase food self-sufficiency for Hawai'i and preserve and strengthen the agriculture industry for future generations.

We must increase our efforts to protect the best agricultural lands from development and preserve them for agriculture into the future and we must strengthen our commitment to providing infrastructure and water for agriculture. Increasing our food self-sufficiency will contribute to our own communities rather than sending our dollars out of the State for imported food."

Loss of any prime, unique, or statewide important agricultural land undermines this mission.

It is unclear whether the 88 acres of agricultural land to be absorbed by this project is limited to the rail route itself and associated facilities or is extended to include agricultural lands adjacent to construction boundaries. There exists a myriad of evidence that when transit routes are created, development crops up around it. This is the basis of the popular "if you build it, they [development] will come" mentality, which is one of the arguments used to justify building a mass transit system through non-urban regions. Once the rail transit route is in place, it is expected that development will occur along the route. Therefore, any existing agricultural land along the route will also be affected by the project. In order for any final EIS for rail transit to accurately and completely examine the environmental impacts to agricultural lands, the project must include agricultural lands adjacent to project construction boundaries.

The DEIS claims that "all of the affected properties designated as prime, unique, or of statewide importance and/or actively being farmed are owned by individuals, corporations, or agencies that plan to develop them in conformance with the Ewa Development Plan (DPP 2000)". However, on the DPP's website for the Ewa Development Plan, the first sentence is "The Plan protects prime agricultural lands". Which is true?

Regardless, the land in question remains prime, unique or statewide important agricultural land. Therefore the future state of the land should be irrelevant when discussing environmental impacts to it, as the scope of this DEIS is to examine environmental impacts on the current conditions and not on future planned conditions that do not exist.

A detailed plan for mitigating all negative environmental impacts to agricultural land affected by this projects including an analysis of alternative routes to preserve prime, unique, and/or statewide important

agricultural land must be provided in any final EIS. If such land must be used for the proposed project, land equivalent in acreage and quality (as defined by equivalent ALISH soils classifications and water availability) must be provided elsewhere to replace the land consumed by this project's development.

Figure 1 at <http://equiliberate.org/fig1.jpg> plots data shown in Figure 1-1 of the DEIS as vehicle miles traveled (VMT) per registered automobile over time from 1980 to 2006. People are logging more miles today than in the last three decades.

Based on project population in 2030 shown in Figure 1-5 of the DEIS, city area, and year 2000 population density from the U.S. Census Bureau, the population density for Kapolei and Makakilo, Ewa, Waipahu and Waiawa, and Downtown Honolulu are plotted in Figure 2 (at <http://equiliberate.org/fig2.jpg>) for year 2000 and year 2030. Projected population density is plotted for year 2030. Kapolei and Makakilo, and Waipahu and Waiawa, were combined since data was given by zipcode and these regions share the same zipcode. Downtown Honolulu was included to provide a baseline population density reflecting urban development on Oahu. Figure 2 then shows population densities for Kapolei, Makakilo, Ewa, Waipahu, and Waiawa that are about 50% less than that of Downtown Honolulu. This difference can be attributed to the fact or likelihood that suburban sprawl either exists or is planned for the Waiawa through Kapolei area. Greater distances between community services increase the need for automobile use, thereby

- 1)Negatively impacting convenience of using a public mass transit system.
- 2)Creating an increased need for automobile support facilities (i.e. park-and-rides, access ramps, roadways, etc.) in order to enable the population to use a public mass transit system.
- 3)Decreasing the likelihood that the population in this area will use a public mass transit system.

The presence of a mass transit system has a proven record of encouraging development along the transit corridor, as evidenced by the increasing real estate values associated with properties closer to transit stations given in Table 4-35 of the DEIS for various existing transit systems in the United States. The environmental impacts associated with encouraging suburban sprawl, especially since the DEIS uses this projected growth as a justification for extending the Build Alternatives to the Waiawa through Kapolei area (Chapter 1, in particular), must be discussed, and measures for mitigating adverse impacts must be provided, in any final EIS.

According to the DEIS, the methodology for projecting future air quality as a result of the various project alternatives is based on anticipated vehicle miles traveled (VMT) and average network speed for each alternative. The data given in the DEIS indicates that all Build Alternatives yield better air quality than the No Build alternative. The only logical way for this to occur is if the proposed rail transit system replaces enough cars on the road such that its emissions are less than the

collective emissions of the cars it replaces. In other words, the data shown in Table 4-12 of the DEIS depends on the number of cars that the rail transit system takes off the road. There are so many variables involved in determining the number of cars that the rail system will take off the road that a number of different scenarios could result. How accurate is the data shown in Table 4-12? What assumptions were made to produce the data shown in Table 4-12?

Is it possible that the emissions generated from using electricity to operate any of the Build Alternatives would not be offset by reductions generated by any reduced VMT? That is, is it possible that emissions generated by operating any of the Build Alternatives will exceed emissions reductions resulting from reduced VMT? What assumptions were made in determining VMT?

Any final EIS must include measures for mitigation for scenarios where emissions from any of the Build Alternatives exceeds those of the No Build Alternative. The DEIS states that "Any measures to reduce automobile travel would reduce air pollutant emissions". This is not necessarily true. An attempt to reduce air pollutant emissions may not be successful. Consider the worst case scenario: the rail transit system is built and operable but is not sufficiently used. In this case, resultant emissions would actually exceed that of the No Build Alternative since additional cars would be in operation in addition to the rail system. This DEIS does not confirm that this scenario and/or other less extreme scenarios are not possible. Such a statement is therefore not justified and should be removed in any final EIS.

From the data presented in the DEIS, it is unacceptable to consider only Ldn (24-hour average, penalizing night noise) and/or Leq (average sound). The maximum noise levels must be the criteria used to determine environmental impacts of noise since a few extremely noisy events, like a train rolling by, can be balanced with no noise (no train) to produce an average sound event that is only moderately noisy. People will not likely experience the average noise depicted in Figures 4-39 to 4-42 at any given moment, rather they will experience the maximum noise levels and minimum noise levels independently. If my interpretation of this information is incorrect, the final EIS should provide clarification.

The DEIS states that once the project is operating, noise levels will be measured to determine the actual extent of project noise impacts. However, no measures for mitigating any moderate and/or severe noise impacts that may arise are provided. Any final EIS must include a methodology for noise mitigation that the project shall adhere to.

The DEIS states that the proposed Build Alternatives will have no effect on endangered and protected waterbirds despite the fact that waterbird habitats exist within the project boundaries. The justification for this claim given in the DEIS is that

"Over time, the waterbirds would adjust to new structures built for the Project since the wetlands would remain intact. This is expected

because the waterbirds have continued to occupy the wetlands after the construction of nearby buildings and overhead utilities and the construction or widening of adjacent roads or highways."

Have any studies been conducted that investigate the environmental impacts of development on endangered waterbirds and protected waterbirds and their habitats? If so, please provide sources for each study and state whether or not the study findings support the DEIS claim that there will be no effects. Did the previous construction activities (construction of nearby buildings and overhead utilities and the construction or widening of adjacent roads or highways) result in noise intensity and duration, site disturbance, and all other environmental impacts to the endangered waterbirds' and protected waterbirds' habitat equivalent to each of the proposed Build Alternatives? If so, please provide evidence that supports this claim. Was the proximity from previous construction activity to wetlands and/or endangered waterbird and protected waterbird habitat the same as the proximity from the proposed construction activity to the wetlands and/or endangered waterbird and protected waterbird habitat? Will the noise in the areas where endangered waterbirds were observed remain the same after any of the proposed Build Alternatives are complete and operational? If not, the environmental impacts of noise on endangered waterbird and protected waterbird habitat must be investigated in any final EIS and mitigating measures must be provided.

What is the accuracy of the each field survey conducted and bird point counts? What is the margin of error? If accuracy cannot be guaranteed, a potential for environmental impacts to endangered terrestrial fauna exists. These impacts must be identified in any final EIS, and measures to mitigate these impacts must be included in any final EIS.

Are the "numerous canopy trees" in the Tern habitat enough to support the existing and future white tern population? What is the basis of the claim in the DEIS that the other large canopy trees in urban Honolulu will result in no impact to the white tern population? Please provide sources to substantiate this claim.

How were field surveys conducted? The DEIS explains the procedure for conducting point counts but not field surveys. Any final EIS must include the procedure followed for conducting field surveys.

Why was 8 minutes the duration used for point counts? Please provide a justification for the use of this time interval. One study found that on average 55% of all initial species detections occurred within the first 5 minutes, and 82% of all initial species detections occurred within the first 10 minutes, of 15-minute long point counts regardless of time of day or use of aural stimuli. If the results of this study hold true for Hawaii, only about a 75% of all species were detected over the 8-minute period. Were single or multiple visits conducted? Bartlet, et al. (1999) recommended two visits.

What time of day were point counts conducted and was any aural stimuli used?

The results of the Water Quality Impact Assessment for the EPA must be included in any final EIS and the public must have an opportunity to comment on this study.

What permanent BMPs will be implemented to ensure there is no change in the amount of infiltration? An increase in infiltration relative to existing conditions can have positive environmental impacts. Have any studies been conducted to determine if this is feasible?

The DEIS states that because the Project would rely on electric propulsion, minimal pollutants would be generated on the guideway relative to pollutants generated by roadway traffic. Has a study been conducted that confirms this assumption? If so, please provide a source.

The DEIS does not acknowledge the fact that floodplains provide ecological benefits beyond groundwater recharge and infiltration, including but not limited to maintenance of biodiversity and fish habitats. In fact, the DEIS states the contrary by saying "the only beneficial functions for the floodplains analyzed in the study corridor are the recharge of groundwater and drainage conveyance". Please provide evidence to support this claim.

The DEIS states that a 2% reduction in energy consumption would result from each of the project Build Alternatives relative to the No Build Alternative. The transportation analysis is referenced as the source for this analysis of operational energy consumption. The transportation analysis references the Oahu MPO Travel Demand Forecasting Model as the source of the daily trips per transportation type per Alternative data. This data is the basis of system-wide daily travel data (vehicle miles per day per for each alternative), which is the basis of the total energy consumption of each alternative presented in Table 4-18. The Travel Forecasting Methodology Report, which explains the details of the Travel Demand Forecasting Model, states that "The mode choice model was also updated and recalibrated to improve accuracy of the model coefficients and relationships and to calibrate the alternative-specific constants. ...The mode choice model was re-calibrated as part of the Draft EIS process; however, the details of it are not discussed in this report. " Where can these details be found?

What assumptions were made in the determination of transit ridership? In Table 4-18, Total energy consumption is the sum of roadway and bus energy consumption and the fixed guideway vehicle energy consumption. The latter energy consumption is greater across all Build Alternatives relative to the No Build Alternative. Therefore, the energy savings of the Build Alternatives results solely from reduced roadway and bus energy consumption. Indeed, the No Build Alternative energy consumption in this category exceeds the energy consumption of each Build Alternative in this category. Therefore, the DEIS assumes that less automobile and bus vehicle miles will be traveled in each Build Alternative. That is, Table 4-18 assumes that operation of the fixed guideway system will result in less automobile and bus usage. What

data is this assumption based on? How was transit ridership projected? Is it possible that transit ridership will not result in less roadway and bus energy consumption (i.e. fixed guideway vehicle energy consumption exceeds roadway and bus energy savings)? Please provide a justification for any response to this question. Did the model consider that automobiles may become increasingly more efficient by 2030 and into the future?

The fact that photovoltaic cells could be integrated into project stations to reduce project electricity demand, as the project states as a measure of mitigation, provides no tangible mitigating effect. Any final EIS must provide a detailed analysis of measures that could be taken to reduce the project's net electricity demand and total energy consumption. This analysis must consider the feasibility of integrating alternative energy technologies into the project as well as an analysis of energy conservation measures that could be implemented to increase the operational efficiency of the system.

The DEIS lists a number of ways the volume of hazardous materials used and extent of worker exposure could be limited as a means for mitigation. This list of mitigating measures must be implemented in order to adequately mitigate environmental impacts of hazardous waste.

It is not acceptable to use prime agricultural land as a site for a maintenance and storage facility when a clear alternative (given in the DEIS) is present.

Why is the entire transit route (in all Build Alternatives) elevated? Kapolei is currently grossly undeveloped. The transit route should be placed at ground level where geography permits to preserve view planes and reduce construction cost and energy consumption. This would result in 150,000 MBTU energy savings per track mile during construction, based on the information provided in the DEIS. Any final EIS must consider energy conserving measures like this.

Where clearing and grubbing occurs, will these areas be revegetated to the extent possible? The DEIS is not clear on this point.

Will pruning of trees found to contain chicks be delayed until chicks fledge or not? The DEIS is not clear on this point.

Under what conditions will additional studies, such as but not limited to a complete Phase I Environmental Site Assessment, during the design or construction phase be performed? Will remediation of contaminated soil and groundwater that is discovered during the project occur? To what extent?

In addition to demolished material, will every effort be made to recycle or make available for reuse unused construction materials and other waste generated on site? What measures will be taken to minimize the amount (in weight and/or volume) of construction waste generated over the project construction phase?

Any final EIS must provide margins of error for all data and assumptions made in the DEIS.

Please send comment responses to:

Kim Kido
1348 Alewa Drive
Honolulu, HI 96817

Yes

Draft EIS Comment

Reply Requested :

Submission Type :

**FOIA (Freedom of
Information Request)
Request :**

FOIA Referral Date :

FOIA Response Date :

RECORD # 529 DETAILS

Status : Initial Action Needed
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Submission Method : Website
Other Submission Method :
Submission Date : 02/06/2009

Submission Content/Notes : RE: Draft EIS for Honolulu Transit Corridor Project

Missing in the section about ridership is any data about ridership if Waikiki and UH are included in the initial phase of the project. This data needs to be included so we can compare the various build options. If the number of stations are limited to the top 8 ridership stations with one station at each end with a total of 10 MAJOR stations initially, I think there is enough in the budget to build the entire proposed Glideway System, including Waikiki and UH.

Also missing from the Proposed Draft EIS are alternate Glideway routings for the Convention Center, Waikiki, UH areas.

Historical properties, such as the Ala Wai Canal Kalakaua Avenue Bridge and the Kalakaua Avenue median (with its beautiful line of Mahogany Trees) just Diamond Head of the Ala Wai Canal make the proposed alignment of the Waikiki Glideway unworkable.

The Draft EIS should also show this alternate routing through Waikiki to UH:

WAIKIKI ROUTING ALTERNATIVE ONE

from the Ala Moana Station:

Diamond Head on Kona Street, then Diamond Head across Atkinson St and along the towers, across the Ala Wai Canal, transiting Lapeepee Street and Hobron Lane, over HECO's power station and low-rise, across Ala Moana Blvd., across Fort DeRussy and Kalakaua Avenue and down Kuhio Avenue, across the Beach Walk Pumping Station and down either the two small streets that pass through Waikiki between Kalakaua and Kuhio Avenues (going through building which are built over these streets - via condemnation for the right-of-way), then down Liliuokalani Avenue, across the Ala Wai Canal, across the Golf Course and up University Avenue to UH.

Because there is one line from UH to Waikiki (instead of two ends - one starting at UH and one starting in Waikiki which would cut the start trains to every 12 to 15 minutes), this routing has the advantage of a train leaving the stations at both UH and Waikiki every 6 minutes instead of every 12-15 minutes (people are encouraged to take the train if they don't have to wait and wait at the station every time they want to use it and UH and Waikiki will be the heaviest used stations on the System).

WAIKIKI ROUTING ALTERNATIVE TWO

Another alternative routing through Waikiki could be from Kona Street, cross Atkinson Street, pass the towers, and turn along the Convention Center side of the Ala Wai Canal and follow it up to Olohana Street, and cross the Ala Wai Canal and pass into Waikiki on wide Olohana, cross Kuhio Avenue, proceed up Duke's Lane to the International Market Place and curve over and pass through the International Market Place and behind the Kaiulani Hotel and on up Prince Edward Street and then turn Malaka on Liliuokalani Avenue, cross the Ala Wai Canal, over the Golf Course and up University to the UH.

Please include these alternative routing options in the Draft EIS.

If there are questions please call me at 949-2497. I've lived in Waikiki for 38 years and the traffic gridlock we experience here is tremendous. 20,000 Waikiki workers spend hours every day caught in traffic due to the gridlock and are not able to spend time with their children as a result. Waikiki needs to be on the initial build of this system.

robert rodman

Reply Requested :
Submission Type :
**FOIA (Freedom of
Information Request)
Request :**
FOIA Referral Date :
FOIA Response Date :

Yes
Draft EIS Comment

RECORD # 530 DETAILS

Status : Initial Action Needed
Creation Date : 2/6/2009
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Add to Mailing List : None
Submission Method : Website
Other Submission Method :
Submission Date : 02/06/2009

Submission Content/Notes : I do not support this rail project as it stands, for several reasons.

It costs too much for what we are getting.
Steel on steel is especially not good for Hawaii due to high maintenance.
At-grade light rail would be infinitely better than elevated steel on steel rail - cheaper and safer, especially due to our earthquake and hurricane prone islands.

I am afraid what it will do to the areas that are developed around it (increased crime, noise, and depression; visual blight)
Again, it is too expensive. 6 billion dollars (or more) for something that will not alleviate traffic; this is billed simply as an 'alternative' - we can do better. Even a BRT/light rail system would be better - and more flexible.
Now that it is supposed to go through the airport, I suppose you think tourists are going to take it half-way to Waikiki? Think again. They'd have to catch it with luggage, perhaps children, elderly, etc. in tow, stop 19 times, get to Ala Moana, grab all the luggage, etc. & then what - call a cab?

This is insanity... please consider how to better spend our tax dollars.
You're planning to give the bulk of the money to a mainland company who is going to bring in mainland employees. Yes, they'll spend money, but the bulk of it won't stay here. You can build cheap (that's an oxymoron if I every heard one) housing in the areas surrounding the stations, but who is going to rent there with the train screaming through every 2 minutes (so they say) from 4 am to midnight? People who can't afford to live anywhere else, that's who. The same low-income, mostly low class people who get subsidized fares, housing, & food - bus riders. Would YOU live in housing next to a train, especially with neighbors like that? I have my doubts...

Anyway, I hope this project doesn't go through as it's sort of planned - we can do better. WAY better.

Sincerely yours,

JMitchell

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Comment/Suggestion

RECORD # 531 DETAILS

Status : Initial Action Needed
Creation Date : 2/6/2009
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Submission Method : Website
Other Submission Method :
Submission Date : 02/06/2009
Submission Content/Notes : The number of stations should be cut to the bare minimum because they will become another abode of the homeless mentally ill which now inhabit our bus stops. Daily we see such individuals who sit on the bus stop benches while a stream of urine runs down to the concrete under them while they sit above. These same individuals - who - it is easy for anyone to see - live in the same garments for months or years, are seen sitting on the cloth seats on the buses we ride (which cloth seats obviously have never been wet washed since the buses were delivered new to the city).

With this in mind, I can find no mention of scrubable seats planned for the trains in this system in the EIS.

Further, I can find no mention of any plans to keep the station concourses and platforms described starting on page 2-20 and shown in Figures 2-11 & 2-12 clear of homeless campers, or businesses and portable travel desks and chairs which daily now are allowed to block Waikiki's sidewalks near the Market Place.

These issues need to be addressed in the Draft EIS for this Transit Project.

Reply Requested : Yes
Submission Type : Draft EIS Comment

RECORD # 532 DETAILS

Status : Initial Action Needed
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Submission Method : Website
Other Submission Method :
Submission Date : 02/06/2009

Submission Content/Notes : Noise Impacts:

It is unclear if you are using Cylindrical or Point Sources for noise calculations. Distance attenuation is significantly different for each (point source is 6dB per doubling, vs 3dB cylindrical). A train passing by a residence is cylindrical source. Please clarify this in the document. (The equivalent "sound of a leaf-blower" is not pleasant at 4 am.)

Where to start / MOS

The Draft EIS makes it clear that that the majority of ridership will be between home and school or work, and the vast majority of this is in the urban core between Waikiki and Pearl City, with the downtown area being the most common destination, and one which has severe parking limitations. So clearly, this is the area which would have the most ridership and should be built first, but the need to have space for a baseyard sways the development toward the Ewa end, where the intention is to spend years constructing a segment which is almost useless as a stand-alone.

- Please discuss the areas which would generate the most immediate usage (and revenue).
 - Please discuss economic collapse considerations, and how a partially-built rail system (e.g., East Kapolei to Waipahu) would be used if construction were to be halted if the project ran out of money.
 - Please discuss the minimum segment which could operate as stand-alone (e.g., Airport, downtown, and Ala Moana)
- Please discuss the most fiscally cautious build-out which would allow operation of working segments, considering both dedicated (rail) options and flexible (elevated guideway for multi-purpose vehicles, which could accommodate bus-type vehicles and could allow conversion to rail once the complete system is in place.

Alternatives Analysis

- The public needs to be fully informed about the possible alternatives before proceeding, and the most attractive and realistic alternative was intentionally excluded from consideration, which makes the draft EIS unacceptable. Panos (and others) have provided articulate arguments for a drive-on, drive-off elevated guideway which provides multiple benefits.
- The system could bus-oriented and at-grade from Waianae or Haleiwa or Laie and then drive up on to the elevated guideway segment to bypass central corridor / downtown congestion, and continue at grade from Ala Moana to Waikiki or UH, which are the most heavily accessed end eastern end points. This means a single route from these origin and destination points can be easily managed, and express routes over such distances. Why is this not considered?
- Such a system would also allow door-to-door service for Handivan (ADA) service for the disabled and elderly, for emergency vehicles (ambulance, fire, police, rapid-response, military, etc.)
- The risk assessment should consider that this elevated roadway is not locked into one single technology, and even if the transit system fails completely, this system can be used by any busses, and competing technologies.

Failure Modes and Downtime

- An essential part of the discussion is failure modes. How could this go down?
- An elevated rail system is inherently a brittle technology, and if a segment of line goes down, the system could be totally out of commission. We are also proposing TOD to get people into car-free lifestyles, so people need to be able to feel they can rely on the system. We need a serious discussion of worker strikes, seismic events, terrorism, power failures, cost over-runs leading to the bankruptcy of the system, and other issues which could lead to a failure of the system. That is, a complete risk assessment for this and competing technologies. (Please do not say “that can't happen”; things do happen. Cost over-runs are extremely common, and this could become embroiled in lengthy litigation over cultural resources or burials, etc. (Look up “The Big Dig” for Boston's example))

What else can we get for our money?

The scenic vistas from many segments of an elevated guideway will be breathtaking.

Imagine the value of utilizing the service access route on the elevated guideway as a cross-town, no intersections bicycle route. People would want to bicycle to work. Imagine using this so you could walk or run across town without fear of traffic, with a breeze blowing across you, and clean air to breathe above the street-level traffic.

Imagine using this to get tourists to scenic areas at off-peak times. Imagine using this to get visitors swiftly to and from the airport, seeing panoramic vistas from the Waianae mountains to Diamond Head along the way, instead of the freeway or Nimitz industrial corridor.

Imagine using this for a segment of the Honolulu Marathon, or bike races, or triathalons. Imagine Wide World of Sports following the leaders on live TV, with the beauty of the south O'ahu coastline behind them. Talk about massive free advertising for tourism! What wonderful events to run in the winter, when football season is over, and we can get TV coverage for beautiful Hawai'i weather while mainlanders are snowed in.

Imagine being able to rent a bicycle with a credit card swipe at transit stations and conveniently bike to wherever you want to go, and then relock it in the rental station closest to your destination, saving time, carrying items you purchased along the way – all without ever needing to own a bicycle.

Imagine a day off when the clouds are rolling toward your beach, so you hop on a train and pick up a bicycle to get to a sunny beach on the other side of the island.

This investment is something we will be using and paying for for over 50 years, perhaps 100. Please take your time and get this right, as it will shape the development of this island for generations.

Thank you for considering these options.

Yes

Reply Requested :

Submission Type :

Draft EIS Comment



STATE OF HAWAII
DEPARTMENT OF EDUCATION
P.O. BOX 2360
HONOLULU, HAWAII 96804

OFFICE OF SCHOOL FACILITIES AND SUPPORT SERVICES

February 2, 2009

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

Dear Mr. Yoshioka:

SUBJECT: Draft Environmental Impact Statement for the Honolulu Transit Corridor Project

The Department of Education (DOE) has reviewed the Draft Environmental Impact Statement (DEIS) for the Transit Corridor Project (Project). The DEIS is comprehensive in identifying all DOE schools adjacent to the Project, however there should be certain consistencies in identification throughout the DEIS. Pearl City Elementary School is adjacent to the alignment but isn't identified as a school on all maps. Aliamanu Elementary and Aliamanu Middle are two distinct schools.

The DEIS has no information on future public school sites which are in proximity to the Project. Maps should include the sites of the elementary school on the University of Hawaii – West Oahu land, and the elementary and middle schools within the Department of Hawaiian Home Lands East Kapolei project. The DEIS also does not identify the Pohukaina block in Kakaako (adjacent to the Mother Waldron Park) as a potential school site with its own impacts.

In the maps of planned extension routes for the Project, there is no identification of the existing Barbers Point Elementary or Lunalilo Elementary.

The largest amount of land that would be given up for the Project is the estimated .16 acres at Waipahu High School, if the maintenance and storage facility is located at the former Navy Drum property. In addition to the removal, relocation and replacement of school facilities in the school area identified for acquisition, the DOE would want to see plans for landscaping since the strip of land remains a part of the face of the campus. The DOE also wants to be sure there are adequate security measures taken to prevent public access from school property.

The need for landscaping and maintenance of the landscaping also applies to Radford High School, Aliamanu Middle and Aliamanu Elementary, where the project proposes to cross along their "front yard."

AN AFFIRMATIVE ACTION AND EQUAL OPPORTUNITY EMPLOYER

Mr. Wayne Y. Yoshioka

Page 2

February 2, 2009

The discussion of transit oriented development, which goes hand-in-hand with the development of the transit system, does not acknowledge that increased residential density in urban areas such as Waipahu could generate demand for additional public service space such as parks and school sites that cannot be met in areas already so urbanized.

The DEIS discussion on noise impacts claims there are 18 to 23 residential buildings, parks and schools that will experience adverse noise effects. The DOE would like to know which DOE schools are in that count. We would also like to know which future schools might experience adverse effects, such as a future school on the Pohukaina block of Kakaako.

The Board of Education (BOE) has a policy for when air conditioning or other noise control measures must be provided. During construction, or during the transit system's operations, if transit generated noise levels exceed the BOE standard of 55 dBA; the project will need to provide mitigation. If the mitigation includes air conditioning, it must also include electrical upgrades to support the air conditioning as well as provide ongoing maintenance.

The DEIS acknowledges schools adjacent to the project will be affected by a variety of construction issues. The DOE notes the DEIS statements that efforts will be made to mitigate these effects. The DOE seeks assurance that school principals will be consulted about construction schedules and all construction impacts when work is planned near the affected schools.

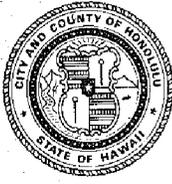
The DOE appreciates the opportunity to review the DEIS. If you have any questions, please call Heidi Meeker of the Facilities Development Branch at 377-8301.

Sincerely yours,



Duane Y. Kashiwai
Public Works Administrator

DYK:jmb



ROMY M. CACHOLA
COUNCILMEMBER
(808) 768-5007
(808) 768-5011 (fax)
e-mail: rcachola@honolulu.gov

February 2, 2009

Mr. Wayne Yoshioka, Director
Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, HI 96813

Dear Mr. *Wayne* Yoshioka:

Re: Comments Relating to the Draft Environmental Impact Statement (DEIS) for the Honolulu Rail Transit Project

Thank you for this opportunity to submit final comments on the aforementioned project on behalf of residents in my district.

My concerns include the following:

- I. Ridership Estimates
- II. First Segment from East Kapolei to Waipahu
- III. Alternative First Segment: Downtown to Kapolei
- IV. General Excise Tax Collection
- V. Construction Costs
- VI. Operation & Maintenance Costs
- VII. Transit-Oriented Development
- VIII. Other Concerns and Questions

I. RIDERSHIP ESTIMATES

The DEIS lists ridership for the airport alignment as 95,310 daily passengers by the Year 2030 and 87,570 daily passengers by 2030 for the Salt Lake Boulevard alignment (SLB). I am skeptical of both ridership projections, in view of the following:

A. Airport Visitors

Based on data from the Hawaii Tourism Authority, Hawaii has about 7 million mainland and international visitors each year. Of this amount, 71 percent go through Honolulu International

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Airport, while the remaining 29 percent go to the neighbor islands. Asian visitors, the majority of whom are Japanese, total approximately 2 million. Japanese visitors usually come in a tour group with a tour package, which includes airline, hotel and ground transportation, and attractions. They usually arrive in the morning. However, because check-in time at the hotel is in the afternoon, ground transportation is waiting for them to take them shopping or elsewhere until check-in. Therefore, they will not be likely to take the rail. **Do ridership projections for the airport alignment take into consideration these figures?**

There are other factors that may discourage visitors from riding the rail. First, the proposed passenger station on Aolele Street is too far away from the passenger terminals.

- **What is the distance from the passenger station on Aolele Street to the domestic and international terminals? To the interisland terminal?**
- **When passengers disembark at the station on Aolele Street, how will they get to both passenger terminals? Will a walkway be built? If so, what's the estimated cost and who will be responsible for the costs of building and maintaining the walkway?**

A second major factor that may discourage visitors from riding rail is that the rail line does not extend into Waikiki where a large majority of our visitors are staying. Having mentioned the above disincentives, **please provide a breakdown in the number of visitors who are expected to ride the airport alignment. Will there be luggage compartments on the train to accommodate our visitors?** Ron Tober, chair of the panel of experts who selected the technology for the rail system, noted several dead periods while personally observing passenger traffic at the airport. Mr. Tober also suggested that the Salt Lake alignment would provide for a better ridership base than the airport. **To get a better gauge on visitor numbers, what are the frequencies for visitor arrivals?**

B. Airport Employees

As for airport employees, there are about 727 state and 15,000 private sector workers at the airport. There are several factors that may discourage employees from riding the rail, foremost of which are the 7,000-plus parking stalls at the airport, which includes the State's new \$43 million, 8-level 1,800-stall parking structure, which was built to accommodate future increases in the number of people who use the airport. A good number of State and private sector employees have designated parking stalls at the airport. Furthermore, for security reasons, airlines' crewmembers have their own shuttle service to and from their hotels and back. In view of this, **please provide a breakdown in the number of airport employees who are expected to ride the airport alignment.**

C. Pearl Harbor and Hickam Employees

There are approximately 12,500 civilian employees combined at Pearl Harbor and Hickam. Please note that firstly, these civilian employees already enjoy the convenience of free parking on base. Secondly, the passenger station at Radford Drive is located outside of the base on Kamehameha Highway. To get to their workplace, employees must walk over a mile onto the base. Thirdly, most military personnel either live on base or within a short driving distance. Those who live further away understandably prefer to drive for convenience and emergency purposes. Having mentioned the above, **please provide a breakdown in the number of civilian employees, contractors and military personnel who are expected to ride the airport alignment. Do the ridership numbers take into account these factors?**

D. Population Estimates From Aloha Stadium to Middle Street

The DEIS on page 4-39 lists the population in the Year 2000 for the transit corridor at about 552,100 and the population of the Aliamanu-Salt Lake area at more than 54,000. If residents in Foster Village and lower Halawa are included, along with several new condo and other housing development makai of Salt Lake Boulevard, the population count will surely be higher—possibly between 60,000 – 70,000. If you add shoppers and employees in the Mapunapuna industrial area, at Salt Lake Shopping Center, Stadium Mall, KMart and the new Target department store (which opens in March 2009), the numbers are quite substantial and add to the daily ridership count.

With the above facts stated, I strongly believe that the over 60,000 residents who live along the 4-mile stretch of Salt Lake Boulevard and those who work and shop in the area—including the new Target store which will open by March 2009—represent a solid and dependable ridership base. These are locals who will ride the rail despite a bad economy.

To get a more accurate picture of population and ridership levels for the Salt Lake Boulevard and airport alignments, please provide answers to the following:

- **What is the projected population count for both alignments only for that portion of the MOS between the Middle Street Transit Center and the Aloha Stadium by the Year 2018 and the Year 2030?**
- **Out of the 95,310 estimated daily riders for the airport alignment, how many passenger boardings are attributed only for that portion between Aloha Stadium and the Middle Street Transit Center when the MOS is completed by 2018? By 2030? Please detail the methods used to arrive at those figures.**
- **Out of the 87,570 estimated daily riders for the Salt Lake Boulevard alignment, how many passenger boardings are attributed only for that portion between Aloha Stadium and the Middle Street Transit Center when the MOS is completed by 2018? By 2030? Please detail the methods used to arrive at those figures.**

II. FIRST SEGMENT FROM EAST KAPOLEI TO WAIPAHU

I question the rationale for building the first segment from East Kapolei to Waipahu, particularly when it will do little to relieve traffic since gridlock begins where H-1 and H-2 merge. I am convinced that this MOS first segment: 1) will fall woefully short of bringing most commuters to their intended destination of urban Honolulu and beyond; and 2) will cost taxpayers more money, and this scenario will continue until you reach Downtown.

In view of the above, when completed, **1) Who will ride this first segment? 2) What is the estimated ridership for the first segment? 3) What's the estimated funding to complete the first segment from East Kapolei to Waipahu? 4) What is your estimated operation & maintenance costs? 5) What is the estimated taxpayer subsidy for operation & maintenance costs for this first segment? Please justify your numbers.**

III. ALTERNATIVE FIRST SEGMENT: DOWNTOWN TO KAPOLEI

Ron Tober, chair of the technology selection panel, in testimony before the Council's transportation committee on February 22, 2008, stated his preference to begin the project from

Downtown towards Kapolei rather than from Kapolei towards Downtown. I support Tober's preference.

It seems that finding a suitable baseyard has been a major sticking point for the administration. **Has the City considered construction of a subsidiary or layover baseyard? Can the City later build a permanent baseyard adjacent to the Leeward Community College when the transit line is extended to Waipahu and beyond?**

Since the City already owns the Middle Street Transit Center, could a portion be used as a subsidiary or layover baseyard? There are several reasons for this:

- The transit line will connect to the Middle Street property.
- A subsidiary or layover baseyard could serve as a back-up in case operations at the permanent backyard are halted for any reason.
- The full use of the 100 rail cars for the entire 20-mile long first segment as stated in the DEIS will not be required, since the initial segment of the MOS may only be between 6-8 miles long and not the full 20 miles.
- The design and planning for a subsidiary or layover baseyard can still be incorporated into the overall design and plans for the Middle Street property.

Could a subsidiary or layover baseyard for rail double up to potentially service (repair, maintain and clean) existing City buses and handivans? How many rail cars are needed to service the approximately 6-8 mile long initial segment of the MOS?

IV. GENERAL EXCISE TAX COLLECTION

According to an article in the December 11, 2008, edition of the Honolulu Advertiser, the latest transit tax collection numbers are down from last year due to the bad economy. For the first 20 months of the tax collection, the total amount is \$246 million, or \$12.3 million per month. Over the 15-year period of General Excise Tax (GET) collection, or 180 months, the City can expect a total of \$2.2 billion in GET revenues, which is way short of the \$4.054 billion projected in the DEIS. So far, things aren't working out as planned. According to a Honolulu Advertiser article dated January 27, 2009, GET collections for the first half of Fiscal Year 2009 were down nearly 6 percent to \$79.4 million (not including the 10 percent collected by the State).

Page 6-4 of the DEIS states that general excise tax surcharge revenues are estimated to be \$4.054 billion (YOE \$) through FY 2023. For purposes of clarity, please note that Act 247 authorizing the half percent GET collection will be repealed on December 31, 2022—not through Fiscal Year 2023. **What are you basing the amount (\$4.054 billion) on? Please provide yearly projections for the half percent GET collection and justifications for those projections.**

Currently, debate on the cost of the 20-mile MOS in today's dollars, ranges from a low of \$3.7 billion to about \$5.3 billion. The administration maintains that the estimated amount of \$3.7 billion, which includes a contingency of \$1 billion, is enough to complete the MOS. **With declining GET collection and added cost (airport alignment) comes the question: in case of a deficit in GET collection, how will the City make up the difference?**

V. CONSTRUCTION COSTS

The airport route costs \$220 million more than the Salt Lake Boulevard (SLB) route plus \$75M for double decking the Lagoon Drive rail station. For the sake of our taxpayers, we need to carefully analyze whether funding estimates are what we can truly afford. If not, we run the risk of repeating the experiences of cities such as Denver, Colorado. Extending Denver's FasTracks system, which was estimated in 2002 to cost \$4.7 billion, now costs \$7.9 billion. Denver officials are now contemplating whether to raise their sales tax to fund this increase. **In light of this, how confident are the administration and city consultants that the \$3.7 billion price tag, which includes a \$1 billion contingency, is more than enough to complete the MOS? Would the administration be willing to allow the City Council to cap MOS funding to no more than \$3.7 billion? If not, please explain.**

Per the DEIS, we are unsure of the amount of funding that we will receive from the federal government. **To save taxpayer money and avoid cost overruns & delays, would the administration be willing to obtain a Full Funding Grant Agreement (FFGA) and/or a Letter of No Prejudice (LNP) before construction? If not, please explain.**

VI. OPERATION AND MAINTENANCE COSTS

The current policy on fare box revenue can cover only up to 30 percent of TheBus operation and maintenance costs. So currently taxpayer operation and maintenance subsidy is about \$130 million. **What are the estimated operation and maintenance costs for the MOS? Taking into consideration that the \$2 fare for rail can be used to transfer onto TheBus or TheBoat as long as it's going one way, what is the estimated taxpayer subsidy?**

In my research, New York City's Metropolitan Transportation Authority (MTA) is facing a huge \$1.2 billion budget deficit and is proposing to drastically cut service on its subways, buses and commuter railroads. According to the November 20, 2008 edition of the New York Times, the MTA is also proposing to raise fares by 23 percent in 2009 and by another 5 percent hike in 2011. Some riders would be hit harder than others. For example, fares for the Long Island bus would increase by 43 percent. All of these proposals have angered passengers. Under the 23 percent fare hike, the public's share to operate and maintain the subway would increase to 83 percent, while the cost of operating local buses borne by riders would rise to 48 percent. **Will the city resort to fare increase or raising property tax to fund operation and maintenance shortfalls of our multi-modal transit system? What measures are needed to prevent large increases in operation & maintenance costs and large fare increases—similar to the experiences of other cities?**

VII. TRANSIT ORIENTED DEVELOPMENT (TOD)

The SLB alignment extends through Mapunapuna which encompasses 150 acres and is owned by a single landowner who is willing to donate land and help build a passenger station. Adding a station in Mapunapuna would increase ridership, save taxpayer money and provide greater opportunities for affordable housing and potential TOD development. There are other TOD opportunities at Stadium Mall, K-Mart across Stadium Mall, the former Costco site (now Target department store), and the Salt Lake Shopping Center.

- **Where are the TOD potentials along the Airport alignment, and how do they compare to the potential sites along the Salt Lake alignment discussed above?**

- Why won't the City exhaust all efforts to include a transit station in the Mapunapuna industrial area, since the landowner is willing to assist with the construction of a transit station, which would reduce costs for the City and taxpayers?
- How far along will TOD be in the airport area by the time the MOS is completed in 2018? And 2030?

VI. OTHER CONCERNS AND QUESTIONS

- Page 4-88 of the DEIS says that the guideway could come within 10 feet of some facades along Dillingham Boulevard and would block views from the upper stories of mixed-use buildings Koko Head of Kalihi Street. What will be the impacts to residents of condominiums across Dillingham Shopping Plaza from McNeil Street to Waiakamilo Street?
- Table 3-21 on page 3-39 of the DEIS states that 10 feet of additional right-of-way will be acquired on the makai side of Dillingham, from Puuhale to the Costco Driveway, due to the effects of column placements. Will businesses and residential homes in the area be affected? If so, which ones? Will this require sidewalks to be moved back or sidewalk space to be smaller?

I hope the concerns I have expressed will merit your consideration. On behalf of my constituents, I would like to thank you for the opportunity to express our concerns on this very important transportation project for the residents and taxpayers of Oahu.

Very truly yours,



ROMY M. CAÑHOLA
Councilmember
Council District VII



State of Hawaii
DEPARTMENT OF AGRICULTURE
1428 South King Street
Honolulu, Hawaii 96814-2512

February 3, 2009

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

Dear Mr. Yoshioka:

Subject: Draft Environmental Impact Statement/Section 4(f) Evaluation and
Supplemental Information

The Department of Agriculture has reviewed the subject draft environmental impact statement (DEIS) and offers the following comments that are limited to the East Kapolei – Pearl City Highlands segment.

The Honolulu High-Capacity Transit Corridor Project (Project) right-of-way and proposed maintenance facility will use approximately 88 acres of "Prime" and "Other Important" agricultural land, of which approximately 70 acres are actively cultivated (Chapter 4, pages 4-19, -20). The DEIS states that pursuant to the Ewa Development Plan, the larger agricultural area situated on both sides of the Project right-of-way is to be eventually developed into urban uses (see Figure 4-3, Chapter 4, page 4-15). The entire Ewa plain makai of the H-1 Freeway, including the Project, adjacent planned urban development and the existing agricultural activities is within the City's Urban Growth Boundary.

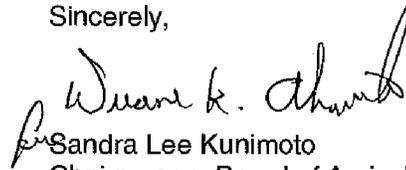
The Project site has many of the attributes that would likely qualify it as candidate Important Agricultural Lands, pursuant to Chapter 205, Hawaii Revised Statutes. The loss of these highly productive agricultural lands and any relocation of the affected farming operations northward make it critical that the agricultural lands, north of the H-1 Freeway and along Kunia Road, designated as "Agricultural Land Preservation" in the Ewa Development Plan and Central Oahu Sustainable Communities Plan remain in agriculture.

The DEIS states that the project will displace less than one-tenth of one percent of the 70,000 acres of agricultural land in cultivation on Oahu. Obviously the impact on agricultural lands in central Oahu is much greater. We recommend that the DEIS

include information on the scale of the agricultural activities affected within the vicinity of the Project. For instance, the DEIS for the Hoopili development through which the Project right-of-way passes through, identified four farming operations that are leased or licensed to occupy agricultural lands in the vicinity of the Project – Aloun Farms (1,000 acres of which 301 were planted), Fat Law's Farm (100 acres of which 80 were planted), Sugarland Farms (197 acres of which 64 were planted), and Syngenta Seeds (200 acres of which 59 were planted). These four farms had \$6 million in farmgate revenues, or 4.4% of Oahu revenue from sales of all crops (2006 Statistics of Hawaii Agriculture, page 81), or 14.3% of the farmgate value of vegetables and melons produced on Oahu (ibid., page 80). The farms employed 77 people represents about 3.9% of all the farm workers on Oahu (ibid., page 156).

Furthermore, we recommend that the affected farm operations be made aware and kept informed of the phasing of development, and that they be allowed transit of farm personnel and equipment for fields to be affected by the Project right-of-way so as to maximize their productive use of the leased/licensed lands for as long as possible.

Sincerely,



Sandra Lee Kunimoto
Chairperson, Board of Agriculture

DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION SERVICES

09 FEB 4 PM 2: 21

RECEIVED

298278

REGARDING DRAFT ENVIRONMENTAL IMPACT STATEMENT

TO: MR. WAYNE YOSHIOKA
Dept. of Transportation Services
City and County of Honolulu
650 So. King St., 3rd Floor
Honolulu, Hi 96813

From: Mrs. Leatrice Fung
3088 La Pietra Circle
Honolulu, Hawaii 96815

I am very much against the Draft Environmental Impact Statement (Deis) for the following reasons:

- Rail is completely dependent on fossil fuel (much of it foreign fossil fuel) throughout it's life. This is exactly the opposite of what we should be doing. We should be reducing our dependency on fossil fuels. Vehicle energy is moving away from fossil fuels. Every few years there is an improvement away from fossil fuels. Rail is the worse climate warmer.
- The need to replace our sewer system is much more important than building the rail system. Our untreated sewage leaking, discharging, or gushing out of our sewage pipes is not only hygienically unsafe but disgusting and repulsive. The accident on McCully last month was unnecessary and shameful.
- The visual blight of elevated rail lines throughout town will be an eye sore wherever it goes. Imagine the height of the rail around Nordstrom being 145' above ground.
- The noise blight of the rail system 79db at 50 ft. will cause nerves to fray, the gradual deterioration of the neighborhoods accompanied with economic costs, and reduced property taxes.
- Rail will create increased traffic congestion in town as supporting pillars take away valuable road space.
- Hot lanes provide cheaper/better solutions to our traffic problems so why not save the money? Our state budget is over \$1billion in debt this year before we even start.

Sincerely yours,

Leatrice Fung

Leatrice Fung

REGARDING DRAFT ENVIRONMENTAL IMPACT STATEMENT

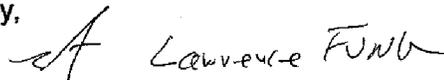
TO: MR. WAYNE YOSHIOKA
Dept. of Transportation Services
City and County of Honolulu
650 So. King St., 3rd Floor
Honolulu, HI 96813

From: Mr. Lawrence Fung
3088 La Pietra Circle
Honolulu, Hawaii 96815

I am very much against the Draft Environmental Impact Statement (Deis) for the following reasons:

- Rail is completely dependent on fossil fuel (much of it foreign fossil fuel) throughout its life. This is exactly the opposite of what we should be doing. We should be reducing our dependency on fossil fuels. Vehicle energy is moving away from fossil fuels. Every few years there is an improvement away from fossil fuels. Rail is the worse climate warmer.
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- Hot lanes provide cheaper/better solutions to our traffic problems so why not save the money? Our state budget is over \$1 billion in debt this year before we even start.

Sincerely,

 Lawrence Fung

288 2/11

Lane O. Sato
607 North King Street #126A
Honolulu, Hawaii 96817
Phone: 808-220-1108

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

Mr. Yoshioka:

Thank whoever for wasting more of our tax dollars by sending out this piece of garbage of a plan. Maybe this letter will convince whoever is behind this project that someone is making a big mistake with this proposed rail system project. This is not going to totally solve the immediate traffic problem on this island, in fact, it is going to make it worse. Please take into consideration the following, which it seems, no one wants to address, which makes me believe that this whole rail thing is just to line a segment of the populations pockets with a lot of money.

The simple solution to this problem is to understand what is truly at stake here. Take into account the following aspects that are being grossly and negligently under looked:

1. The bus system really works fine. The real problem is too many cars on the island congesting limited major East-West thoroughfares, not lack of mass transit.
2. If the rail project begins, you think you got gridlock now, just wait until construction hits the inner city. People will be cursing the project every day they spend an extra two plus hours creeping inch by inch in traffic, burning gas and this will not be just a one or two year project. And what about when there is a major traffic incident on H-1, the rail does not offer any solutions to that.
3. The tracks will not be extended into the upper lying areas so, you would have to plan for an extra hour or two just to get to and from the stations, which means you will not or hardly ever use it. And, even if it is decided to extend to upper lying areas, can you imagine the gridlock during construction then?
4. Like the poll says, this will only benefit a handful of people, mainly the one's who are to profit.
5. A more advantageous solution is to build a causeway from Waianae to Waimanalo over the water spanning the entire Southern Coast and later, if necessary, continue around the island, or, constructing a freeway along the mountain ranges. After pitching this idea with engineers at the town hall meeting at the Blaisdell, they said "no problem, in engineering we can build anything".

The major consideration for this idea is that H-1 desperately needs a major East-West alternate route. For those of you thinking this would be an eye sore to the coastline or the mountain ranges consider this: If built properly, it would probably enhance the view and in reality is one of two sensible solutions. We need to give up something and giving up the causeway or freeway project to rail would tragically be the wrong choice for the majority if not all of Oahu inhabitants. We must not allow the Offices of the Mayor and their constituents to perpetrate this masochistic behavior on the future of this State.

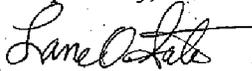
6. The Offices of the Mayor and their constituents have jumped into this project without careful consideration of all practical/reasonable solutions and are drooling at the potential for lining their pockets with a very hasty and ill thought out plan. Look at it this way, they can still line their pockets with the causeway/freeway project which is the smarter solution.

So, to recap, the main problem is too many cars on the island with no alternate East-West freeway relief, not lack of mass transit. This is the major point here. The bus system would work fine with fewer cars jamming limited traffic signaled East-West thoroughfares. As a fellow taxpayer, please be sensible and come to this realization. If built with a well planned scheme, this would benefit Oahu and relieve major traffic stress for years to come. Any other idea would be inviting seriously dire economic, political and social consequences for the future of our keiki and the State.

I hope you can convince the Mayor and his constituents to re-evaluate. I personally prefer the mountain range solution as this would allow cutoffs to service both sides of the island. Either the causeway or the mountain range construction solutions would not severely impair the day to day business operations of the island as the rail project will. Please take this into strong consideration and at least present this to whoever is trying to ram this down our throats. If you cannot provide a favorable response to this issue then do not bother responding. I will assume that you also sold out.

Mr. Matley, if it is within your power, please find a way to save the people of Oahu's future by overturning/disapproving this stupendously horrific project. You are one of the last and probably only resorts left to stop this hastily irrational and ill conceived project.

Respectfully,


Lane O. Sato

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

Mr. Wayne Y. Yoshioka, Director
Dept. of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Flr
Honolulu, HI96813

SUBJECT: HONOLULU HIGH CAPACITY TRANSIT CORRIDOR PROJECT

RE: 10 REASONS WHY A TRANSIT STOP IS NOT NEEDED AT THE AIRPORT

The following is for your consideration:

1. Most people arriving here by plane are tourists on tour packages; as such, both they and their luggage are transported between the airport and their hotel by the tour operator. Since most hotels for tourists are in Waikiki, the transit system will be of no use to get them from the airport to Waikiki since it terminates at Ala Moana Center.
2. Many visitors from the Orient arrive in the early hours of the morning; consequently, their hotel room is not available until after 2:00 PM. Therefore, they are taken on tour buses to visit various locations on the island then delivered to the hotel at the time they can be registered and given a room.
3. People not on tours, after deplaning must go to baggage claim to retrieve their luggage. After getting their luggage, they can not go back into the terminal. Consequently, to use the transit system, they will have to find their way with their luggage to the transit stop. From the diagram in The Advertiser showing only one transit stop, getting there from baggage claim area will be very difficult, especially for the elderly or handicapped.
4. For any traveler with luggage using the transit system for transportation to

their residence will have the problem of getting from a transit station to their residence. Again a challenge for the elderly or physically disabled.

5. Conversely, people wanting to go to the airport will have the problem of getting themselves and their luggage to a transit stop. For the elderly and physically challenged this may be insurmountable.

6. Arriving at the airport, getting from the transit stop to a ticketing area of the terminal will be another challenge since airline ticketing is spread from one end of the terminal to the other, most of which will not be near the transit stop. This will be especially true for inter-island travelers.

7. Flight crews are transported between the airport and their hotel by ground transportation provided by the airline for which they work. Again since most of them are billeted in Waikiki, the transit system will be of no use to them.

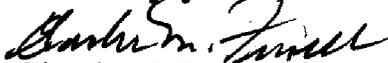
8. Other workers in the vicinity of the airport live all over the island, many not anywhere near the transit line. Getting to and from work, the transit system will be of little use to them.

9. If such workers were to use the stop at the airport, they will then have the problem of getting from there to their work place which may not be nearby.

10. All of these reasons will work to deter people from using the transit system for transportation to and from the airport. Most people will continue to do exactly what they do now, take a taxi, shuttle service or private automobile to and from the airport to be delivered to the ticketing area for their departing airline, picked up at baggage claim for transportation to their residence or going to and from their work place.

Lastly, have you thought of the absurdity of passengers getting off an airplane after an 8-9 hour flight, getting on a train to go to Ala Moana Center? Get REAL!!

Sincerely yours


Charles M. Ferrell

295830

DEPARTMENT OF FACILITY MAINTENANCE
CITY AND COUNTY OF HONOLULU

1000 Uluohia Street, Suite 215, Kapolei, Hawaii 96707
Phone: (808) 768-3343 • Fax: (808) 768-3381
Website: www.honolulu.gov

MUIF HANNEMANN
MAYOR



GEORGE "KEOKI" MIYAMOTO
ACTING DIRECTOR

IN REPLY REFER TO:
DRM 09-32

January 16, 2009

MEMORANDUM

TO: WAYNE Y. YOSHIOKA, ACTING DIRECTOR
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: *[Signature]*
GEORGE "KEOKI" MIYAMOTO, ACTING DIRECTOR
DEPARTMENT OF FACILITY MAINTENANCE

SUBJECT: HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR
DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

Thank you for the opportunity to review and comment on the DEIS for the Honolulu High-Capacity Transit Corridor dated November 2008.

We request that any required improvements or reconstruction to City roadways and facilities within these roadways associated with the subject project be constructed in accordance to City and County Standard Details.

Should you have any questions, please call Charles Pignataro of the Division of Road Maintenance, at 768-3697.

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DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION SERVICES

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
PHONE: (808) 768-8000 • FAX: (808) 768-6041
DEPT. WEB SITE: www.honolulu.dpp.org • CITY WEB SITE: www.honolulu.gov

2994/8

MUFI HANNEMANN
MAYOR



DAVID K. TANOUE
ACTING DIRECTOR
ROBERT M. SUMITOMO
DEPUTY DIRECTOR

BA

January 29, 2009

MEMORANDUM

TO: WAYNE Y. YOSHIOKA, DIRECTOR
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: DAVID K. TANOUE, ACTING DIRECTOR *[Signature]*
DEPARTMENT OF PLANNING AND PERMITTING

SUBJECT: REQUEST FOR RAIL TRANSIT STATION DRAWINGS

We are requesting a set of the latest Station Drawings (10 percent completion) for our City's Honolulu Rail Transit Project. The preliminary information will allow our department to better understand the intended operation of the transit system and evaluate its effects on circulation and land use. This information will not only complement our work on on-going and subsequent Transit-Oriented Development (TOD) plans, and improve the efficiency of our TOD process, but also assist you with any permitting issues or requirements raised by these more detailed drawings.

We appreciate your department's willingness to work with the Department of Planning and Permitting on this effort. Should you have any questions, please call Bonnie Arakawa of my staff at 768-8048.

DKT:lh

cc: Site Development Division

P:\PolicyDocuments\Action Plans\Waipahu Neighborhood Plan\Correspondence\DPPmemoDTS

DIRECTOR'S OFFICE
DEPARTMENT OF
TRANSPORTATION SERVICES

09 JAN 29 P 2 : 40

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RECORD # 543 DETAILS

Status : Initial Action Needed
Creation Date : 2/9/2009
Creator Affiliation :
First Name : Jamie
Last Name : Story
Business/Organization : Grassroot Institute of Hawaii
Address : 1314 South King Street
Alternative Preference :
Apt./Suite No. : Suite 1163
City : Honolulu
State : HI
Zip Code : 96814
Email : jamie@grassrootinstitute.org
Telephone : 808-591-9193
Telephone Extension :
Add to Mailing List : None
Submission Method : Letter
Other Submission Method : DART #1/09-295335
Submission Date : 01/07/2009
Submission Content/Notes :
Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :
FOIA Response Date :
Attachments : 20090206113925.pdf (95 kb)

295335

From: Jamie Story [mailto:jamiesue@clearwire.net]
Sent: Thursday, January 08, 2009 12:00 AM
To: Yoshioka, Wayne; ted.matley@fta.dot.gov
Cc: Governor.Lingle@hawaii.gov; Apo, Todd K; Dela Cruz, Donovan M; Marshall, Barbara; Djou, Charles; Bainum, Duke; Tam, Rod; Cachola, Romy; Okino, Gary; Garcia, Nestor
Subject: Grassroot Institute response to DEIS

Mr. Yoshioka and Mr. Matley,
Attached is the Grassroot Institute of Hawaii's response to the DEIS for the proposed Honolulu rail transit system. Please contact me if you have any follow-up questions. Thank you for your time!

Sincerely,

Jamie

Jamie Story, *President*
Grassroot Institute of Hawaii
jamie@grassrootinstitute.org
(808) 591-9193

The mission of the Grassroot Institute of Hawaii is to promote individual liberty, free market economic principles and limited, more accountable government. Please visit our [website](#) to make a tax-deductible donation or to learn more.



January 7, 2009

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

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

Mr. Yoshioka and Mr. Matley,

I am writing this letter out of concern regarding the proposed Honolulu rail transit system and the related Draft Environmental Impact Statement (DEIS).

Throughout 2008, the City and County of Honolulu made a number of claims, many of which are included in the DEIS, which cannot be substantiated by existing data. Our policy report, *Debunking Myths of Honolulu Rail Transit*, refutes many of these claims in detail. Below are just a few of these claims, along with brief explanations of the facts.

Claim: *Public transit ridership will increase with the addition of rail transit.*

Truth: Since 1960, Denver is the only city that has held onto a slight percentage increase in transit ridership after building rail. In metropolitan areas with high public transportation usage (Boston, Chicago, New York, and San Francisco), percentage of public transportation usage has decreased in all the cities following the implementation of rail systems. The same pattern is occurring for metropolitan areas with second tier public transportation usage (Detroit, Houston, Los Angeles, Phoenix, Portland, Sacramento, San Juan, San Diego), contrary to what the city's radio and TV ads would have one believe. (Decennial Census 1960-2000 and American Community Survey for 2007. US Census Bureau. http://factfinder.census.gov/servlet/DatasetMainPageServlet?_lang=en&_ts=240267317805&_ds_name=ACS_2006_EST_G00_&_program)

Claim: *Rail systems in cities such as Vancouver, Salt Lake City, Portland, and Washington, DC have been vital in reducing traffic.*

Truth: According to the Texas Transportation Institute's 2007 Urban Mobility Report, none of these cities have experienced a reduction in traffic, and traveling times for

commuters have increased even in spite of rail.
(http://mobility.tamu.edu/ums/congestion_data/tables/national/table_4.pdf)

Claim: *Rail uses less energy than automobiles or other commute options.*

Truth: According to the US Department of Energy, energy use per passenger mile (Btu) is 3,512 for cars, 4,235 for buses, and 2,784 for rail. Motorcycles clock in much lower at 1,855, while the Toyota Prius clocks in at only 1,659 (Transportation Data Book, Chapter 2, Table 2.12 Passenger Travel and Energy Use, 2006. US Department of Energy, [www-cta.ornl.gov/data/chapter2.shtml](http://www.cta.ornl.gov/data/chapter2.shtml); Greenhouse Gas Emissions per Passenger Mile. Public Transport & Personal Mobility in USA in 2005. www.demographia.com/db-ghg-carstr.pdf). Given rail transit's declining ridership and permanent dependence on fuel, the increasing popularity of fuel-efficient cars such as the Prius and newer models mean that energy efficiency is increasing for cars while it decreases for rail. Furthermore, the energy necessary to build a rail system offsets any estimated energy savings. Portland's environmental impact statements estimates the system would need 172 years of savings—moving commuters from cars to rail—in order to make up for construction.

Claim: *Rail reduces carbon emissions.*

Truth: The CO2 output of the light and heavy rail, buses and the average car are presently very nearly the same. With the advent of hybrid and other more efficient cars and the high turnover of cars, the average car will soon surpass all other commute options, including heavy rail. This argues for transit systems that allow for large numbers of increasingly energy efficient cars—not fixed rail systems that will soon become a thing of the past.

Claim: *A \$6.5 billion train is cost-effective.*

Truth: According to the DEIS, the proposed rail system with both Airport and Salt Lake routes will cost \$6.5 billion in capital costs alone, or more than \$6,000 per Oahu resident. These numbers are excessively large, especially when more cost-effective traffic solutions exist. For example, the construction of HOT Lanes would cost just \$0.9 billion, while shaving 40 minutes off of the commute time from Kapolei to Downtown as compared to rail. ("Transportation Alternatives Analysis for Mitigating Traffic Congestions between Leeward Oahu and Honolulu" directed by Professor Panos D. Prevedouros, of the University of Hawaii at Manoa.)

Thank you so much for taking the time to understand these concerns as expressed by the Grassroot Institute of Hawaii. Please don't hesitate to contact me if you need any further information.

Sincerely,

Jamie Story
President
Grassroot Institute of Hawaii
1314 S. King St. Suite 1163
Honolulu, Hawaii 96814
(808) 591-9193
www.grassrootinstitute.org

RECORD # 545 DETAILS

Status : Initial Action Needed
Creation Date : 2/9/2009
Creator Affiliation :
First Name : Frank
Last Name : Genadio
Business/Organization :
Address : 92-1370 Kikaha Street
Alternative Preference :
Apt./Suite No. :
City : Kapolei
State : HI
Zip Code : 96707
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Waipahu
Other Submission Method : Main
Submission Date : 12/10/2008

Submission Content/Notes : Frank Genadio of Kapolei. You have my address from a previous testimony. My remarks are directed to the attempted EIS to eliminate a technology that is not steel wheels on steel rails. The City Council fumbled away its chances to place the right question on the November ballot, leaving us with a take-it-or-leave-it choice for steel.

Actually, the Council should have placed two questions on the ballot
First would be: Do you support a fixed-rail transit system for Oahu? The second would be: If you answered "yes," do you favor a fair and open competition among all four types of rail technologies?

For those of you not familiar with what the Federal Transit Administration considers rail, it is not just steel wheels, but includes rubber tire on concrete, conventional monorail, and elevated magnetic levitation, the system I favor.

Based on responses to the City's request for information, there would be 10 technology suppliers, including five that do not propose steel-on-steel. Figure 29 of the EIS shows a solid structure that is 28 to 32 feet across as a bridge needed for steel wheel systems. The HSS (inaudible) maglev guideway in comparison would be only 21 feet across, including open space between the beams on which the levitated train would ride. Picture the difference on Farrington Highway and the lessened impact on homes and businesses. And also consider the fact that the maglev is at least twice as quiet as steel-on-steel without any need for steel's noise mitigation measures.

Those of you with children or grandchildren in five to nine years might be interested in knowing that the EIS project for a 20-mile steel wheel bridge would cover at least 25 miles of guideway for the maglev. Using the same amount of labor and materials in the current plan, that is no loss of jobs or decrease sales of steel and concrete, this would enable extension of the guideway to the U.H. Manoa campus within the time line for the initial system. Since U.H. West Oahu will have limited curriculum, reaching Manoa is important to future college students from this area.

The first maglev -- the HSS (inaudible) maglev is not only faster and much quieter and cheaper to develop than steel-on-steel, it would also will be somewhere between \$12 and \$18 million per year cheaper to operate and maintain because of (inaudible) running. Cost to modify the EIS to accommodate other technologies is a drop in the bucket of the plan's estimated \$7 billion budget.

I'm suggesting that this EIS be delayed and reworked and that the start of preliminary engineering either be deferred or that the study cover all technologies that met the City's initial requirements. Mahalo.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :

Draft EIS Comment
No

RECORD # 546 DETAILS

Status : Initial Action Needed
Creation Date : 2/9/2009
Creator Affiliation :
First Name : Young
Last Name : Kim
Business/Organization :
Address : 94-536 Lumiauu Street
Alternative Preference :
Apt./Suite No. : F102
City : Waipahu
State : HI
Zip Code : 96797
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Waipahu
Other Submission Method : Main
Submission Date : 12/10/2008
Submission Content/Notes :

Good evening. My name is Young Kim. I came here, this is my second time around to mass transit development plan. First one was in the late '80s, early '90 timeframe with Rene Mansho. At that time, I was able to convince the City Council not to develop the rail transit. And this time, my second time around, majority have expressed a willingness to build a transit, so I'm for it, but the plan organization little bit askewed or disorganized.

I lived in Japan for first 14 years and I enjoyed the mass transit system in Japan. Core area had all the transit system, but as the population increased, number of train route have tremendously increased beyond the Tokyo perimeter. When I left town, we had only one subway. Now I think there's 9 to 11 different subway going all over Tokyo.

My question to you is: Where is this storage area and maintenance facility so that the mass transit have to begin from Leeward side? And I just found out from the other side there is a map showing that the Leeward Community College area is one. That's great. So why not build from there toward the core destination area? That way you can -- as soon as you open it, you can use it for the ridership toward the airport. There's more people working around the airport, Hickam, Pearl Harbor area than any other place. Extend it to downtown and to the U.H. Manoa and Waikiki. You have better chance of success than try to do the Leeward from Kapolei to Waipahu. Thank you.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :
FOIA Response Date :

RECORD # 547 DETAILS

Status : Initial Action Needed
Creation Date : 2/9/2009
Creator Affiliation :
First Name : Scott
Last Name : Miguel
Business/Organization :
Address : 94-011 Waipahu Street
Alternative Preference :
Apt./Suite No. : E205
City : Waipahu
State : HI
Zip Code : 96797
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Waipahu
Other Submission Method : Main
Submission Date : 12/10/2008

Submission Content/Notes : Good evening, everyone. I'm Scott Miguel. I supported this back in the '90s when the (inaudible). The question I have is: What do you tell the grandchildren that will have to pay for the system that you say the prices have changed from what's gonna be built to what's not gonna be built? And what's bugging me is, why change and why proofread the EIS report from the Federal Government when it doesn't have to be proofread? By now probably realize I didn't vote for it, but why proofread it when it was already done right by the U.S. Government? What were you hiding from the people? Because I feel that there's a lot of people out there that say, what are you gonna tell your mom and pa's generation of young kids, hey, you're gonna have to pay for something that maybe is gonna be used in Aiea, as a senator is proposing right now. Charles Djou is proposing Aiea to town. What's wrong with that? You promised the people of Kapolei something? Yeah, it's sad that five, maybe 10 people showed up, but what do you tell the younger generation when we get older, it was promised to me. Why wasn't it done then? There is no answers for a lot of things.

That's why tonight I'm hoping you can enlighten me so maybe I can believe something like this, because I have to believe. I don't believe it's possible. You guys come up with different solutions, different way, different solutions. Did you guys really have a plan? Are you guys coordinating with the different agencies? Are you guys pulling the (inaudible), because when you guys are building this, there's a lot of places you guys gotta touch; a lot of different companies you guys gotta work with. Is there a coordination or is there anything that the City has, because so far the people haven't been told everything.

Reply Requested :
Submission Type :
FOIA (Freedom of Information Request) Request :
FOIA Referral Date :
FOIA Response Date :

Draft EIS Comment
No

RECORD # 549 DETAILS

Status : Initial Action Needed
Creation Date : 2/9/2009
Creator Affiliation :
First Name : Natlynn
Last Name : Cunningham
Business/Organization :
Address : 94-1098 Awalua Street
Alternative Preference :
Apt./Suite No. :
City : Waipahu
State : HI
Zip Code : 96797
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Waipahu
Other Submission Method : Main
Submission Date : 12/10/2008
Submission Content/Notes : Hi. I'm Natlynn Cunningham, and I live in the Royal Kunia area. I do not support the current rail system and do support the alternative currently being recommended to start closer to town from the Aiea/Salt Lake area. I believe that would generate more income while it's being built and support more ridership.

My question to you, as I'm a budget officer and for many years, I'm looking at the Federal money that we have not secured yet, that we're gonna go and secure in 2010. Suppose that we get it. The cost of the rail will -- historically costs have tripled, quadrupled. So instead of costing \$5 billion, it may cost us \$15 billion or \$20 billion by the time it's ready to be done. Where is the rest of that money gonna come from? How much is the Government support, the Federal Government?

As I understand, the maintenance will be paid from the City's pot. Does anybody here think that we can afford to maintain the rail? Can we? I mean, every time we hit a pothole, I think people should think about it. Maintenance of the rail is way beyond what this city can support, and I don't want to see my children and my grandchildren have to leave Hawaii because the taxes are too high and they can't afford to live here. It's already expensive. I mean, the future of our local people will be threatened by additional taxes. Thank you.

Reply Requested :
Submission Type : Draft EIS Comment

RECORD # 550 DETAILS

Status : Initial Action Needed
Creation Date : 2/9/2009
Creator Affiliation :
First Name : Eric
Last Name : Minton
Business/Organization :
Address : 719 Mahiai Street
Alternative Preference :
Apt./Suite No. :
City : Honolulu
State : HI
Zip Code : 96826
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Transcript - Waipahu
Other Submission Method : Main
Submission Date : 12/10/2008

Submission Content/Notes : Aloha. I'm not really comfortable on this side of the microphone, but I am in support of a mass transit. I'm in favor of all forms of mass transit. I understand one thing Mayor Hannemann said, and I know he's right, steel-on-steel will be cheaper to maintain. But steel-on-steel is such a heavier train, and I have tried to get an answer from the various committees, what will the difference in construction costs be compared to the other forms against the maintenance?

I have had an opportunity to ride trains in many, many cities. I went to high school in New York City. I went to college in L.A. Business has taken me to Toronto and Montreal, all cities that have all kinds of varieties. My favorite system, which I really wish we were considering, is the monorail. It's the smallest, lightest structure. It blocks the last community, you know, last line, stuff like that. It's cheapest to build.

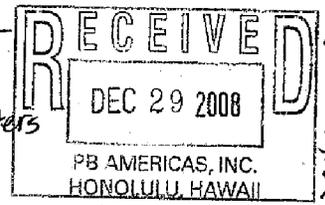
But we'd better not do what we did, what, 20 years ago and shoot ourselves in the foot, because if we don't get some form of really mass transit, we'll go no place. The island will die. It has to happen, a better transit system. I live 30 miles from this room. It took me an hour and 20 minutes to get here. I figured it would only take 40, and that's after calling up the offices to get directions to get here. I don't know where this area is. The meetings closer to me are all on work days. So anyway, that's what I'm saying. I really hope that we look more at the monorail, but we cannot say no. Thank you.

Reply Requested :
Submission Type : Draft EIS Comment
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :
FOIA Response Date :

Frank
Grenadio
12-6-08 Kapolei

Comments on Draft EIS

from
Ralph
Rosenberg
Court
Reporters



The City Council, which earlier this year indicated it would play a major role in selection of the transit system technology, has basically "taken a back seat" to the city administration in recent months. It was unable to pass a resolution for the proper ballot question for November, to have a transit authority—which the city wanted—develop a fixed guideway transit system. Instead, it accepted the wording of a transit foe and we were left with the steel wheels question. The city, for its part, ignored the council and apparently went ahead with this EIS long before the ballot question was approved by the council. Approval of steel wheels on the ballot does not eliminate other suppliers from the competition, but the EIS basically just "brushes off" three other technologies by using a recommendation from a highly suspect (so-called) expert panel. This limiting of alternatives was referred to in the state's review of the EIS as "troubling."

I am not here to support two of those eliminated technologies, and intend to speak only as a proponent of the HSST elevated urban magnetic levitation system. Chapter 02 of the EIS covers Alternatives Considered. In Section 2.1.3, magnetic levitation is listed as a proprietary system unproven in the U.S. Because it is not in the U.S. does not make it unproven. Using this rationale would leave us still traveling in covered wagons. In fact, the Federal Transit Administration has called the HSST a mature technology, and the system has been in revenue service in Nagoya, Japan since early 2005 with a reliability rating of well over 99 percent.

The section goes on to state that "none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail." Concerning the HSST, that statement is not only misleading but is patently false. Compared to steel wheel systems, the HSST mag-lev is faster, much quieter, and safer (because of its wrap-around-the-beam configuration). Its guideway also is not only less obtrusive but will be at least 20 percent cheaper to build. This is extremely important when one examines guideway length for the three alternatives and compares associated costs given in Chapter 06 with expected sources of funds.

The city has funding for a 20-mile minimum operable segment (or MOS) but includes an alternative in Section 2.2.2 that shows a combined airport and Salt Lake alternative of 25 miles. Not only does this alternative place the project over even projected budgets but it excludes any extension to the UH-Manoa campus. Personally, I strongly favor the airport and military base routing over one on Salt Lake Boulevard. If, however, the HSST were allowed to compete, and were to win the transit competition, it might be possible to satisfy most of the interested parties.

If the amount of labor and materials planned for the MOS were applied to HSST development, an additional five miles of guideway could be constructed within the MOS budget and timelines. This would accommodate the airport alignment, extension to UH-Manoa, and spurs into the Salt

Lake area as well as Waikiki. The only way to take advantage of the costs savings associated with the mag-lev is to ensure that guideway specifications are left open to suppliers in the Request for Proposals (or RFP). In Figure 2-9, the Draft EIS shows a guideway of 28-32 feet, as well as a parapet wall (for noise mitigation). This solid structure bridge is much larger than what is needed for the HSST, two beams with open space between the beams and a cross-section of 21 feet—with no need for noise mitigation walls. The narrower profile of the mag-lev guideway, coupled with the much lower sound level of the system, also will result in less impact on homes, businesses, and other facilities along the transit route. Obviously, if the Figure 2-9 chart becomes the specification in the RFP, the mag-lev cost advantage is negated. I will be submitting a comment that this chart be deleted, or shown as an example applicable only for steel wheel systems.

Finally, the costs for operations and maintenance shown in Table 6-3 reflect steel wheel on steel rail amounts anywhere from \$12-18 million more per year than would be needed for the mag-lev. Despite an extra ten percent in electricity to levitate its train cars, the HSST's virtually frictionless running results in lowered costs along with a smoother ride. Over 30 years of operations, that equates to \$360-540 million in savings to island taxpayers.

The bottom line is precisely that: Prevent the HSST mag-lev from competing and we pay more money for what may be an inferior system. If the city is so certain that steel wheel on steel rail is superior, modify this EIS appropriately, keep the RFP specifications general enough to enable all suppliers to have a chance, and allow the HSST to compete. After testifying at the City Council the other day, I had a discussion with a steel wheels supporter outside the chamber. He told me that adding evaluations of other technologies in the EIS would cost an additional \$1.5 million. Let us place that expenditure in perspective. Compared to the 5.4 billion year-of-expenditure dollars for an airport alignment, it is .0000277 percent, or one 36,000th of the cost. This would certainly be money well spent. Take the delay, spend the money, really open the competition, and do something positive for this island's taxpayers and commuters.

Mahalo

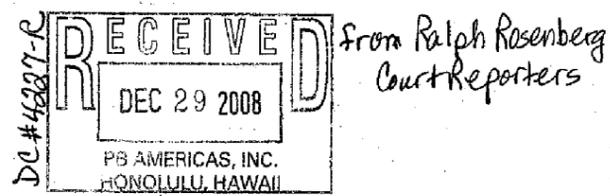


Frank Genadio

92-1370 Kikaha Street

Kapolei, HI 96707

Richard Ubersax
Waimanalo
12/8/08



The purpose of the DEIS is to provide the City and County, the FTA, and the public with the information necessary to make an informed decision, based on a full and open analysis of costs, benefits, and environmental impacts of alternatives considered. However, it seems that in some respects, the DEIS is aimed at convincing the public and the FTA of the benefits of the Project, rather than inform the public.

One example is in the cost-effectiveness of the project. The FTA's cost-effectiveness index is a ratio formed by adding an alternative's annualized capital cost to its year 2030 operating and maintenance cost, and the total is divided by user benefits, in hours saved. The key criteria for determining the cost-effective index are annualized cost of the project, ridership estimates, and the time benefits realized by the riders.

Any proposed New Starts project receiving less than a "Medium" cost-effectiveness index rating will not be recommended for funding by the FTA. The threshold between a rating of "Medium" and "Medium-Low" is \$22.99 per user benefit expressed in dollars per hour of user benefit.

In the Alternatives Analysis, the cost-effectiveness index for the 20-mile alignment from East Kapolei to Ala Moana Center is stated as \$21.34; and for the full project from West Kapolei to UH Manoa with an extension to Waikiki as \$27.05. Thus, the 20-mile segment meets the threshold of \$22.99, but the full project does not.

City ordinance 07-001 recommended the North-South Road/Airport option as the preferred minimum operational segment (MOS) for several reasons, one of which being that the cost-effectiveness index of \$22.56 is below FTA's threshold.

Now, in the DEIS, the cost-effectiveness index has markedly improved to a point that is significantly below the FTA threshold of \$22.99: \$17.53 for the Salt Lake Alternative, \$17.78 for the Airport Alternative, and \$22.86 for the combined Salt Lake/Airport Alternative. Information for the full project with extensions is conspicuously absent in the DEIS although it was available in the AA.

We know that the capital cost and O&M costs have not reduced, so that the only explanation is that the user benefits have increased significantly. If one digs further into the DEIS, you will find the following statement: "Research indicates that positive attributes (both perceived and real) are associated with the use of a fixed guideway system, which make the system more attractive than general bus transit. These benefits include such things as improved safety, security, visibility, ease of use, comfort, and reliability. These factors or attributes are not captured by the standard travel demand forecasting process. To account for these attributes in this user benefit analysis, FTA has approved an additional factor equivalent to a 14.5-minute savings of in-vehicle time. The

Richard
Ubersax
HON 12/8/08

factor was incorporated for riders taking the fixed guideway only. A 5.5-minute savings of in-vehicle time was incorporated for riders taking feeder buses to the fixed guideway.”

Basically what this indicates is that 14.5 minutes is subtracted from every guideway trip made, and 5.5 minutes from every feeder-bus trip to end up with the “time” benefit for guideway trips that is now artificially more favorable. Assuming ~90,000 fixed guideway trips each day, fed by ~63,000 bus trips, this fudge factor adds up to a 22,000-hour time credit for fixed guideway use and a 6,000-hour time credit for feeder-bus use for a total credit of 28,000 hours each day of user benefit ...or over 5 million hours each year of “user benefit”. Although the DEIS does not say so out rightly, this is probably a major factor in the much lower cost-effectiveness index.

Thus, it seems that the City and Parsons Brinkerhoff, with or without collusion by the FTA has decided to apply a new subjective measure to the determination of “user benefits”, which is not incorporated in the transit models. The application of this change is never clearly explained in the DEIS nor any of the publicly available supporting references.

This issue and the exclusion of the complete project (MOS with all extensions) from the cost-effectiveness analysis need to be scrutinized thoroughly by the FTA.

To: Honolulu C&C Dept. of Transportation Services
For: Draft EIS Public Hearing at Blaisdell Exhibition Hall
From: Amy Y. Kimura

Mon., Dec. 8, 2008

Amy Y. Kimura
801 871 1010
HON

Good evening. I testify tonight as an ordinary citizen who rides public transit wherever I've lived and traveled and who likes it for the most part. I enjoyed commuting on the subways in New York City and Japan. As a traveler I've ridden on the trains and buses in Europe, Canada, and the U.S. I list these because many people think everyone who is against the proposed Honolulu rail dislikes mass transit, rail in particular. On the contrary, rail in the places I've used them has been fast, convenient, efficient, and usually reasonably priced. But the populations served by them have been from two times to more than ten times Honolulu's population and could more easily support their operation and maintenance.

One place it was not so reasonably priced was Vancouver, Canada. The Skytrain was clean, convenient, and efficient, but way more expensive than Honolulu's bus system. A MONTHLY ADULT PASS cost \$73-136, depending on the number of zones covered. That's about two to three times the \$40 cost here. What would that do to transit-dependent riders here, people with no auto?

In Vancouver the MONTHLY PASS FOR SENIORS is \$42, more than the YEARLY cost of \$30 for seniors in Honolulu. What would that kind of cost do to seniors on limited and moderate incomes?

For students, monthly passes in Vancouver are also \$42, twice as much as the \$20/month charged by The Bus.

"Transit-dependent" adult riders, the elderly, and children will be greatly affected. Will the City be willing and able to greatly increase its subsidy of transit to keep down the prices of the transit passes for them?

If not, how will that affect the quality of life of seniors of moderate or limited means? How about families of low, moderate, and even middle incomes?

If not, how will that attract motorists out of their cars and on to the fixed guideway?

If yes, how will that affect property tax rates of everyone?

If commuter passes increase in price, the "Choice Riders" of The Bus, those who have an available vehicle to ride but choose to ride The Bus, will likely choose to abandon commuting on public transit in favor of their car, adding to congestion.

Mahalo for giving me this opportunity to comment. In the future more notice would be appreciated. I received your newsletter announcing this hearing three days ago, on Friday, Dec. 5.

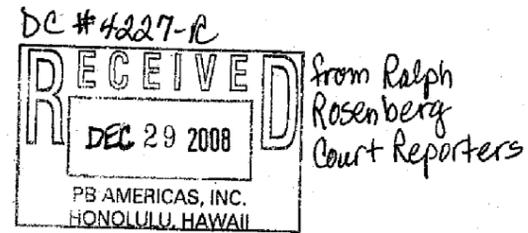
Amy Y. Kimura

RECEIVED
Dec 29 2008
PB Americas INC.
HAWAII

from Ralph
Rosenberg
Court Reporters
DC #4227-R

Monday, December 8, 2008

Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813



Subject: Relating to Honolulu Transit Corridor Project Environmental Impacts

One of the most significant adverse impacts of the proposed archaic elevated steel-on-steel heavy rail system is the irreparable blight it will implant through the vital heart of the Downtown Honolulu Waterfront and beyond. This obtrusive blight will impact four protected historic sites along the proposed Waterfront route - specifically Aloha Tower, Irwin Park, the Dillingham Transportation Building, and Mother Waldron Park.

Because of the City's requirement for federal funding for the proposed elevated rail project, it must comply with Section 106 of the National Historic Preservation Act and Section 4(f) of the Department of Transportation Act. It will therefore be taken into account that such elevated infrastructure blight would be "visually incompatible and block the view of the historic resource (e.g., the scale of the infrastructure would overwhelm the resource's historic appearance)" and would cause the "loss of integrity of setting, feeling and association" of these historic sites. The historic view planes to the Harbor from Bishop Street and the Chinatown Historic District will be similarly impacted.

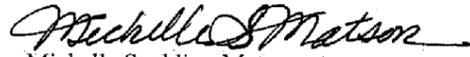
It would therefore be a fatal mistake for Honolulu's future if the City forces the intrusion of elevated transit blight on the Honolulu Waterfront and the *mauka-makai* harbor views. If the Downtown Honolulu Waterfront is allowed to be impacted by the fatal mistake of elevated guideway infrastructure, the vital visual, and indeed historic, character and integrity of the waterfront centerpiece of Downtown and its harbor entrance to Honolulu will be lost. One only needs to consider the blight created by the Embarcadero Freeway along the San Francisco Waterfront, and the universal public elation when it was torn down. It is time that the City and County of Honolulu learns by the mistakes of others before it is too late.

The City also proposes to slam the elevated heavy rail route through Kaka'ako adjacent to another registered historic site, Mother Waldron Park on Halekauwila Street, diminishing its historic character and integrity, and usefulness and attraction as a vital recreational open space for today's growing population. The Kaka'ako Mauka master plan designates Halekauwila Street and its extension to Kamake'e Street as a significant "promenade" street, a pedestrian-friendly boulevard with wide tree-lined sidewalks and new human-scale residential neighborhoods. Thus, the proposed elevated steel-on-steel heavy rail transit infrastructure blight slicing through these neighborhoods is also tragically misplaced.

Michelle
Matson
12-8-08 HON

In conclusion, there are very serious concerns surrounding the City's disregard and neglect of the significant adverse impacts of an elevated transit route along the Honolulu Waterfront specific to the complex of registered historic sites that include Aloha Tower, Irwin Park and the Dillingham Transportation Building, and Mother Waldron Park. This badly-planned project cannot be allowed to overshadow and overpower these significant historic sites or destroy the visual character and integrity of the vital Downtown Waterfront.

Sincerely,


Michelle Spalding Matson

Yoshioka, Danielle

From: Roberts, Stephanie L
Sent: Friday, February 06, 2009 3:35 PM
To: Yoshioka, Danielle
Subject: FW: Comments on EIS for Honolulu Fixed Guideway Mass Transit System
Importance: High

Please load onto CS. Thanks.

Stephanie L. Roberts, AICP

PB

cell: 808.388.5127

From: Yadao, Elisa [mailto:eyadao@honolulu.gov]
Sent: Fri 2/6/2009 3:23 PM
To: Roberts, Stephanie L
Subject: FW: Comments on EIS for Honolulu Fixed Guideway Mass Transit System

From: Yoshioka, Wayne
Sent: Friday, February 06, 2009 3:04 PM
To: Yadao, Elisa; Nishioka, Edward M.
Cc: Miyamoto, Faith; Hamayasu, Toru; Thom, Sharon Ann; Stoeck, Lynette
Subject: FW: Comments on EIS for Honolulu Fixed Guideway Mass Transit System
Importance: High

Aloha kakou!

Another DEIS comment.

A hui hou,

Wayne

From: Alan Gano [mailto:gerneaux@hawaii.rr.com]
Sent: Friday, February 06, 2009 2:56 PM
To: Ted.Matley@dot.gov
Cc: Yoshioka, Wayne
Subject: Comments on EIS for Honolulu Fixed Guideway Mass Transit System

I have not even bothered to read the EIS, primarily because I learned from my previous participation in testifying before the Honolulu City Council and it's Transportation Committee, attending, speaking at, and asking questions at numerous public "mis"information meetings and other public forums; that the complete process has been co-opted by the Mayor, certain City Councilpersons, DTS and the contractors, Parsons Brinckerhoff and InfraConsult, with apparent collusion or at least acquiescence by DTA officials and members of the Hawaii

2/6/2009

Congressional delegation.

I have consistently supported a fair and competitive bidding process for the selection of both the technology and the vendor (which is allegedly the FTA policy), but with the elimination of the HSST Maglev, we have lost the environmental war in the transportation arena since the environmental footprint of the proposed steel wheel on steel rail system, will dwarf that of the HSST Maglev, including guideway size/width, air pollution, noise pollution, aesthetics and cost.

It is a sad day for the mis-informed citizens and taxpayers of Honolulu; when their Mayor and other public officials can lie to them and cheat them, and the local print and broadcast media as well as our federal officials do not hold them accountable.

Alan R. Gano
P.O. Box 29521
Honolulu, HI 96820-1921

2/6/2009

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

2/5/09

VIA EMAIL

Comments on the Honolulu DEIS

In order for the DEIS to provide meaningful information to all the interested parties in this project, the analysis of different options must be carried out with a high level of professionalism. The contractors who are tasked with the design and analysis of traffic/transit improvements must apply themselves with the same high professional standards to reviewing all the alternatives. The contractors must utilize all their knowledge from other projects in order to bring forth the best set of options for our community. In our case, the contractor for the Alternatives Analysis and the DEIS did not use the same level of professionalism to look at all the alternatives.

Unfortunately, this project is riddled with political bias. The current mayor of Honolulu is only interested in rail. At the first scoping meeting in June of 2006, the mayor said, "Don't talk to me about roads. If you want to build roads talk to someone else".

The Mayor's influence can be seen in the way alternatives were analyzed. The Mayor hired the contractor for the Alternatives Analysis.

With the Mayor's admitted disinterest in roads, it is not surprising that the contractor for the Alternatives Analysis used a drawing from some citizen group website for the design of the Managed Lane alternative. The contractor does not know who made the drawing on the citizen group website. The contractor spent zero hours designing a managed lane alternative of their own even though their company has extensive experience in this area.

All of the comments in the Alternatives Analysis regarding the design of the Managed Lane alternative are made by highly paid contractors commenting on a line drawing from a citizen website. No attempt was made to offer their expertise to improve the design. Since the citizen group website drawing of the Managed Lane had one exit near town, the Mayor's contractors spent hours explaining how Managed Lanes cause traffic jams and slow commuters down under such circumstances. This type of analysis is clearly biased.

November 10, 2007, the League of Women voters had a transportation forum to discuss the options before the city. Toru Hamayasu represented the city of Honolulu at that forum. In this presentation, Toru clearly states that the contractor Parsons Brinckerhoff used a drawing from the website that belonged to the community group honolulutraffic.com as their design for the Managed Lane Alternative. This video will be back on the honolulutraffic.com website in a few days. It has been available to the public for the last year. Unfortunately, the company Brightcove that stored the videos for the

honolulutraffic.com website has ended that part of their business. When the video is back on the website, I will file an amendment to these comments.

In order for this DEIS process to be valuable, the city of Honolulu must let the contractors engineer a Managed Lane alternative of their own design. This new work can then be included in a Supplemental DEIS. Only then will the alternatives included in the DEIS be meaningful and not biased. Only then can the FTA be assured that Honolulu is making a prudent decision.

John Brizdle
3001 Lai Rd.
Honolulu, HI 96816
808-732-0071



THE LEAGUE
OF WOMEN VOTERS OF HONOLULU

February 6, 2009

Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813
808-768-8303
Email: [wyoshioka@honolulu.gov](mailto:w Yoshioka@honolulu.gov)

Dear Mr. Yoshioka:

Attached are our comments on the Draft Environmental Impact Statement for the Honolulu High Capacity Transit Corridor Project. We have severe reservations about this project and particularly with the Draft EIS which we feel to be inadequate.

We respectfully request that a Supplemental DEIS be prepared that addresses the issues we raise and those raised by others before the DEIS becomes final. We also request that the Supplement be available as a printed copy for whoever requests it. DVDs are admirable but they are not a substitute for the written word. Too many people do not have computer capabilities and are unjustly excluded from the public participation process. Even those of us who have computers do not necessarily have an office-sized printer that can handle 11 x 17 paper which means we cannot print out the many maps for this project.

Thank you for this opportunity to comment.

Sincerely yours,

Piilani Kaopuiki, President
League of Women Voters of Honolulu

49 South Hotel Street, Room 314, Honolulu, Hawaii 986813 Ph. (808) 531-7448 Fax (808) 599-5669
Website: www.lwv-hawaii.com email: voters@lwv-hawaii.com

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Process

The draft EIS for the rail transit project has been made available on the web. It is also provided on a DVD disk. When we asked for a hard paper copy for the League of Women Voters to review, we were told it would cost us \$59. When we looked at a copy in the library we could understand why. There are many colored illustrations and foldout maps. But that is exactly the point! These can only be printed on a large office printer that can use 11" x 17" paper. The League doesn't have such a printer and most people don't. Not to mention the burden of the cost of color cartridges for ink jet printers!

This is so ridiculous! Many of our members and the general public are not computer literate – they need something they can hold in their hands and read. Even we who are used to using computers need to print out pages that need close attention.

We think that some of the money that went into producing this beautiful document could have been allocated to a less expensive book that was made widely available to people who want to read it. And considering all the money that has been spent in promoting the rail project, even printing a lot of copies of the expensive version would have not been that outrageous.

If you want the public to participate, you have to make it easy. Otherwise, it is just a shibai. We think the City should stop the whole process and start over again, making a printed copy of the DEIS available to everyone who wants one. It should certainly make printed copies of the Supplement to the DEIS that we request available to anyone who wants one.

Chapter 01: Background, Purpose and Need

The Department of Business, Economic Development and Tourism (DBEDT) 2030 population projection series was used in the DEIS. However, DBEDT issued its 2035 population projection series in January 2008 which is lower than the 2030 series figures for Oahu. The lower figures would have an impact on transit ridership and employment.

The U.S Census Bureau's annual estimates of the population for Oahu from 2000 to 2007 were lower than the DBEDT 2030 population series for that period. Estimates are improvement over projections. The average annual growth rate of the census estimates between 2000 and 2007 was much lower than both the 2030 and 2035 DBEDT annual growth rates for this period. If this continues to 2030, then our population would be lower than 2030 and 2035 population series have projected.

Since early 2008, Honolulu has been in a recession, which has caused a decline in tourism and employment, thus reducing in-migration. The Supplemental DEIS must cover these points.

Chapter 2: Alternatives Considered

The Managed Lane alternative was given insufficient consideration. Cost assigned to this alternative was grossly inflated. Ridership projection was unrealistically low. The improvement to bus service resulting from this alternative was dismissed, resulting in too small a projected benefit.

Why does the train start in Kapolei? The stated reason of starting at the maintenance facility is inadequate. Every other new system was started in the city, where the riders are. Washington, DC, experienced unexpected revenue from midday riders going to lunch. How did other systems cope with the distance from maintenance?

The descriptions of the planned rail stations are inadequate:
How high will the Ala Moana station be?
Will there be restrooms in any of the stations?
In the illustrations, mezzanines (in the text) are called concourses. Or are these 2 different things?

Chapter 4

Environmental Justice Sections 4.6.5 Banana Patch Community and 4.6.6 Mitigation

The DEIS notes that this is a multi-generational community in the area bordering Waipahu and Pearl City. Residents who are primarily of Asian extraction and poor occupy it. It is also the place designated for the Pearl Highland park-and-ride lot that will serve the Pearl Highlands Station. All of the Build Alternatives would displace residences, including single-family homes, businesses and one church.

This section concludes, "Impacts to the Banana Patch community suggest a disproportionate effect on community cohesion and isolation in addition to the relocation effects. The displacement of residences could result in social interaction or sense of community, stability, and psychological unity by removing residents who have resided in the same community for generations. Due to the high cost of living and available land, it is unlikely that residents would be co-located in another area of the city." In other words, the residents so dislocated have no place to go. It will be hard enough to relocate the families individually who will most likely join the ever-increasing ranks of the homeless.

Under 4.6.6 Mitigation it is stated, "The identification of a disproportionately high and adverse effect on EJ populations does not preclude a project from moving forward if a mitigation measure that would avoid or reduce the disproportionately high and adverse effects are not practicable." The document further states that since the project would not result in disproportionately high and adverse impacts within the Oahu metropolitan planning EJ areas, no specific mitigation measures to reduce impacts are warranted. Again, in other words, tough luck. As long as you don't wipe out a really big hunk of low-income areas, you don't have to worry about destroying small areas, no matter how poor or desperate the residents may be.

If we remember correctly, the City's response to the protests against urban renewal in Chinatown with widespread displacement of poor people was, since there was no other affordable place to move them to, the displaced simply had to accept it. Fortunately People Against Chinatown Evacuation (PACE) was formed and wielded enough pressure that the project was abandoned.

It is bad enough that we have a throwaway society as far as material things are concerned. There is no way we can justify throwaway people. If you cannot mitigate bad effects, you don't proceed!

Elsewhere in the document re-alignments are suggested to save historic buildings. But no such measures are considered necessary when it is only poor people that are in the way of the train or a parking lot!

We believe the mitigation measures in this case are totally inadequate. Either the plan should be changed or the residents suitably relocated.

Visual and Aesthetic Conditions, 4.7

The rail transit system will be highly visible and generally unsightly. We note that each station will have one, two, or three platforms, each 300 feet long and a minimum of 12 feet wide. Center platforms will be a minimum of 30 feet wide. These are huge! The most deleterious impacts will be on existing buildings where the train comes close, blocking views, light, and air. The overall impact on the island of Oahu will be such that it is certain to have an adverse impact on tourism, our main economic industry. Who will want to visit a "tropical paradise" that is just as ugly, if not uglier, than the place you live?

The DEIS presents many simulated viewpoint figures that are useful in projecting the visual impacts of the project. However, the last figure in the series Figures 4-17 through 4-36 is of the station near Mother Waldron Park near Halekauwila and Cooke Streets. There is no figure for the station at Ala Moana Center. Please include one in the Supplemental Draft/Final EIS. There are also no descriptions of the planned future stations on the routes to the University of Hawaii and Waikiki. Including these in the Supplemental Draft/Final EIS would be helpful.

The DEIS notes that the Chinatown station will be 30 feet above street level and that other stations in the downtown area will block views from the fourth and fifth story windows. In the Supplemental Draft/Final EIS, please indicate the actual dimensions and the elevation above street level of each station in the text accompanying the figures.

Chapter 06: Cost and Financial Analysis

The declining economy is a major concern that affects this project. The Supplemental DEIS should address the following points:

If the revenue of the general excise and use tax surcharge declines, what steps will the city take to make up the shortfall? Already, citizens are decreasing their spending. How will this affect the capital costs?

If Queen Street replaces Halekauwila Street as part of the transit route, how will this impact transit cost?

Does Federal Transit Administration contingency allocation take into consideration a recession?

From: Major, Beverly [mailto:bdmajor@leoadaly.com]
Sent: Friday, February 06, 2009 2:37 PM
To: Yoshioka, Wayne; ted.matley@fta.dot.gov; governor.lingle@hawaii.gov
Subject: Objections to Rail DEIS

Subject: Objections to Rail DEIS

Dear Governor Lingle, Mr. Yoshioka and Mr. Matley,

I'm writing to express grave concerns over deficiencies in the DEIS for Honolulu's heavy rail system.

I found the draft EIS statement to be deficient in numerous areas and have specific questions and concerns about the following:

1. How will this project affect current traffic congestion?
2. The comparison of energy use of rail to bus should be done for hybrids, not traditional combustion engine as this report appears to have done.
3. It is unclear how congestion will be remedied during the many years of construction. Lanes of traffic are to be eliminated in certain areas. Where and when this will happen, and what will happen to congestion in those areas?
4. Will there be bike racks on the train and where will they be located? Will bikes be allowed on the train? Will there be a place for surfboards? What about luggage for airport passengers? What about construction workers' tools?
5. The impacts of relocations has not been adequately addressed for important food producers like Aloun Farms, 14 community facilities that will be "partially acquired" as well as small businesses that will not survive a move or reduction in operations. Historic and cultural sites are also not adequately addressed.
6. There is insufficient information on plans to mitigate noise at the 16 schools that are adjacent to the alignment. How will the noise affect the learning environment?

2/6/2009

7. The analysis of job creation does not adequately analyze job losses. There is no mention of what will happen to the jobs that are lost due to businesses downturn during construction?
8. The report does not adequately assess the potential harm an elevated rail system does to our unique tourist industry and the image of Oahu. How will the tourists see noise and visual impacts of heavy rail? Will the more idyllic neighbor Islands absorb an even larger share of tourism and hurt our County's revenues?
9. The provisions for managing with lower than projected ridership and tax revenue support are inadequate.
10. The plan is also deficient in outlining how corrosion will be mitigated. BART in the SF bay area is made of aluminum. What will happen to steel in a salt air environment? An evaluation of steel vs. aluminum is lacking in this report.
11. Likewise, the DEIS plans for mitigation of graffiti on the concrete support pillars, stations and cars is inadequate. This deficiency will impact the accuracy of predicting the future cost of the project maintenance.
12. Finally, I have concerns that the ADA issues have not been adequately assessed. How long will the doors be open for to access the train? How will an elderly or handicapped person be able to get on and off the train in this time period? Please provide detailed plans on handling handicapped access. How does this effect the efficiency of the train and speed of commute?

Thank you for your thoughtful consideration of my concerns. Please feel free to call me if you have any questions about this letter.

Aloha,
Beverly Major,

521-8889

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2/6/2009

Richard W. Ubersax, Ph.D.
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February 5, 2009

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

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

RE: General Comments on DEIS

Dear Mr. Yoshioka:

I am by no means an expert on transportation planning and engineering, but as an R&D director (now retired) in a multibillion-dollar high-tech company, do have considerable experience in evaluating complex and risky technology projects, including evaluation of alternative technologies and approaches, assessing technical feasibility of proposed approaches, and evaluating outcome probabilities and economic risks. Surprisingly, the principles and methodologies for evaluating the Honolulu rail transit project are very similar. In both cases an informed decision to proceed (or not) is based on reliable input (existing and projected) and objective analysis based on experience, good judgment, and benchmarking against comparable projects. After initiation of approved projects, similar methodologies are applied to measure progress as new information (results) becomes available.

Based on my analysis of the DEIS and supporting documentation, and researching project history and benchmark information, I have serious reservations about whether the City has made an objective evaluation of all of the alternatives against the key criteria, but rather has conducted the process and presented data and analysis to achieve a predetermined result. The magnitude of the cost of the project and the long-term implications that the wrong choice will have on the aesthetic, environmental, economic, and social welfare of the community is cause to pause and reassess the validity of the whole process.

Each Administration has had its own "pet" transit program (just look at the history over the last 20 years), which has resulted in vacillation and delay in moving forward. This has created chaos in the selection process and confusion among the people. The current Administration (and Council) terminated the past Administration's BRT project within days of attaining office and instantly the current program was elevated to the top of the agenda.

I think we all recognize the need for an efficient and cost-effective transit system for the island of Oahu, but we must resist emotional or predetermined decisions and political agendas to dominate the process – rather than a pristinely objective process.

The following examples and discussion are meant to show where I believe there are flaws in the process, data, interpretation of the data, and arguments in favor of the case. There are numerous other examples I could use, but for lack of time and brevity, I have focused on the ones presented. Please take this discourse constructively, even though it may appear highly critical.

Please contact me with any questions.

Respectfully yours,

A handwritten signature in blue ink that reads "Richard W. Ubersax". The signature is written in a cursive style and is positioned above the printed name.

Richard W. Ubersax

P.S.: I have also sent you an electronic copy in .pdf format.

The purpose of the DEIS is to provide the City and County of Honolulu, the FTA, and the public with information necessary to make an informed decision, based on a full and open analysis of costs, benefits, and environmental impacts of all of the alternatives considered. This project is probably one of the most complex and costly projects ever undertaken in the state of Hawaii; so it is critical for the City administrators and the public to have sufficient and objective information to make informed judgments about the various aspects of the project, distill the information to assess the merits of potential alternatives, and determine how it will affect the island and their personal lives. However, it seems that in some respects, the DEIS is aimed at convincing the public (and the FTA) of the benefits of the “Project”, rather than to objectively inform about both the benefits and downsides.

The DEIS and the accompanying Technical Reports certainly contain a plethora of information, but there are many areas where important information is missing or difficult to find, where significant changes have been made from the Alternatives Analysis without sufficient explanation, where the validity of data is in serious doubt, and where decisions and choices have been made and rationalized with incredulous explanation. As a result, the credibility of the entire document and and process is compromised.

The Administration, FTA, and Oahu taxpayers should be wary of spending over \$5 billion on a Project that has been selected on the basis bias, questionable data and judgment, where the risks have not been fully evaluated, and where significant impacts have been summarily dismissed.

In its present form, the DEIS does not meet the criteria set forth in the first sentence of this page. In fact, the City should step back, assess whether they have objectively met all of the criteria and requirements of NEPA and SAFTEA-LU, make the appropriate modifications to ensure compliance, inform the public of their intentions and plan, and then move forward. It is better to take the time now rather than regret unintended consequences in the future.

The following discussion is meant to provide examples where – based on my interpretation and analysis of the information provided in the DEIS, supporting references, and other documentation developed throughout the process – I find that incomplete or ambiguous data has been presented, inappropriate conclusions have been drawn, and/or questionable decisions made.

A. Selection and Evaluation of Alternatives

The DEIS defines the “Project” as a fixed guideway transit system from East Kapolei to Ala Moana Center. Planned extensions are anticipated to West Kapolei, UH Manoa, and Waikiki. The Locally Preferred Alternative selected by City Council includes the Project and the planned extensions. The DEIS considers the following “four” alternatives:

- 1) No-Build Alternative and
- 2) Build between East Kapolei and Ala Moana Center, with three variations:
 - a) Salt Lake Alternative
 - b) Airport Alternative
 - c) Salt Lake + Airport Alternative combined

Actually, these distill to two alternatives – No Build and Build. The three “Build” alternatives described in the DEIS are so similar in terms of environmental impact, benefits accrued, and economics that they cannot be truly classified as distinctly different alternatives; to the skeptic, it appears that they were structured as distinct alternatives in the DEIS to satisfy the legal

requirement of due diligence for the selection and evaluation among all reasonable alternatives. If they were truly distinct, City Council would never have been able to make the switch from the Salt Lake Alternative to the Airport Alternative by a simple Council vote without considerable public input.

It is clearly stated in 40CFR1502.14:

The Environmental Impact statement “*should present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public. In this section agencies shall:*

(a) Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives that were eliminated from detailed study, briefly discuss the reasons for their having been eliminated.

(b) Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits.

(c) Include reasonable alternatives not within the jurisdiction of the lead agency.

(d) Include the alternative of no action.

(e) Identify the agency's preferred alternative or alternatives, if one or more exists, in the draft statement and identify such alternative in the final statement unless another law prohibits the expression of such a preference.

(f) Include appropriate mitigation measures not already included in the proposed action or alternatives.”

It is clear that since reincarnation of rail transit in 2005, there has been bias towards steel-on-steel rail as the preferred transit mode; other potentially viable alternatives have not been considered seriously, or they have been systematically eliminated during preliminary evaluation. The Locally Preferred Alternative (LPA) from Kapolei to UH Manoa with an extension to Waikiki was selected because the end-points make sense and the route passes through the highly populated east-west corridor where traffic relief is badly needed. When it was realized that the cost of this route was significantly higher than the City could afford, the expedient solution was simply to shorten the route, with the intent to complete the LPA at a later time. Other alternatives, which could be as equally effective – and perhaps lower-cost – appear to have been summarily dismissed without comprehensive, objective evaluation. The explanation of why alternatives were not feasible was based on flawed analysis and on the argument that they did not meet FTA or State criteria for funding. In reality, there are alternative federal funding sources, and the State could easily amend HB 1309 to accommodate other Alternatives. It is clear that the political will was – and continues to be – focused on rail (note restrictions in HB 1309 for counties with population of greater than 500,000), and thus has limited the scope of selection of Alternatives.

The current design of the fixed guideway will cause irreparable disruption of views through and across its path; it would ruin the aesthetics neighborhoods and important historical sites. These visual impacts would be impossible to mitigate. The noise of trains passing every 1.5 to 5 minutes will be physically and emotionally distressing, especially during night-time hours along tight corridors. The FTA guidelines are for exterior noise, and do not consider the open window and door lifestyle of our residents. Many of the receptor sites evaluated in the DEIS would shift

from “no impact” to “moderate impact”, or from “moderate impact” to “severe impact” if the criteria were adjusted for our lifestyle. The assessment in the DEIS downplays the severity of noise impacts by not considering L_{max} for instantaneous noise as recommended by FTA guidelines. At present, there are no City or State statutes that regulate noise from mobile sources. Hawaii HAR 11-46 [not HAR 11-16] regulates stationary noise sources. It is imperative that such statutes be legislated to protect the peaceful environment to which we are accustomed.

All things considered, we need to step back and objectively evaluate alternatives that could be more cost-effective than elevated rail and could bring lesser environmental impact along its path. The following are examples that should be considered:

- a) A more environmentally-friendly rail system. The greatest concerns with an elevated guideway, steel-on-steel rail system is the high cost of the elevated guideway (~3-4 times that of at-grade systems) and significant visual, aesthetic, and noise impacts along the guideway. A potential solution would be to build the system at grade through rural areas where possible for lower cost, and through sensitive urban areas (where noise, visual, and aesthetic impacts are problematical), to build at-grade or underground. Fixed Guideway Alternative 4a (Kapolei Parkway/Kamokila Boulevard/Salt Lake Boulevard/King Street/Hotel Street/Alakea Street/Kapi’olani Boulevard/UH Manoa) from the *Alternatives Screening Memo, October 24, 2006* apparently attempted to do this but was eliminated from consideration late in the evaluation process. It (or optimizations thereof) should be revisited, and perhaps with shortened routes (e.g., an MOS from East Kapolei to Ala Moana Center) for greater affordability.

This alternative would be expected to have lesser noise and visual impacts east of Iwilei Road since it descends to grade on Hotel Street and goes underground at Alakea Street to Waimanu Street. The cost of this alternative is expected to be less than or comparable to the DEIS Salt Lake Alternative.

- b) A bus rapid transit (BRT) system similar to that described in the “*Primary Corridor Transportation Project*” FEIS, July 2003 and “*Honolulu BRT Project Evaluation*”, January 2006. The system began operation in November 2004, but was discontinued in June 2005, supposedly due to poor performance (and coincidental with change in City administration).

A conclusion of the 2006 “Evaluation” report is: “*Greater benefits in terms of improving ridership, customer satisfaction, capital and operating cost effectiveness, transit supportive land use, and environmental quality may be possible with more significant investments in dedicated running ways, advanced vehicles, stations, ITS elements, and fare collection.*”

BRT has been proven successful in many U.S. and foreign cities, and could be successful in Honolulu if given the chance. This alternative should be revived and given the necessary planning and engineering resources to make an objective evaluation.

- c) A BRT / Managed Lane Alternative (MLA) hybrid, similar to the EZ-Way proposal by Professor Panos Prevedouros and Councilwoman Ann Kobayashi during her mayoral campaign. A major deficiency in the evaluation of the MLA in the Alternatives Analysis is that the design developed by the City did not provide sufficient egress points along the route to enable uncongested flow at exit ramps. This was a major reason for its dismissal from further consideration. However, it is anticipated that with improved design to

overcome this deficiency, the EZ-Way proposal would ascend to become a viable alternative.

All of the above alternatives would be expected to lessen the environmental impacts that a fixed-guideway elevated system will bring to the highly populated urban center of Honolulu.

Finally on the point of objectivity versus political will: the City Administration, City Council, and entire selection process have lost credibility over the Salt Lake Alternative versus Airport Alternative debacle. The initial selection of the Salt Lake Alternative was politically motivated; the change to the Airport Alternative was proposed the week after the election. The net result is that the whole process is now tainted. Let's take the appropriate steps to restore that credibility by giving all potentially viable alternatives an objective assessment. Yes, it will delay the project; but we "can not afford not to do it".

B. Transit User Benefits and Cost Effectiveness of the Project

a) User Benefits:

This is an area where major change has been made in the DEIS versus the AA without sufficient explanation. To most readers of the DEIS, the change probably went unnoticed because of how the DEIS is structured.

"Transit user benefits represent the amount of transit travel-time savings a user would experience with a given transit alternative compared to the No Build Alternative." (DEIS p. 3-36).

Table 3-19 lists the transit-time savings for various transit markets for the three Build Alternatives compared to the No Build Alternative. These represent future projections calculated by the travel demand-forecasting model. The model predicts that the time saved each day for users of the Project will be approximately 50,000 hours per day or 15-16 million hours per year.

During the period between the AA and DEIS, the FTA allowed an additional benefit to transit users – again expressed in terms of time saved (Federal Register Vol. 72, No. 106. June 4, 2007):

"FTA adopts as final its proposal to allow project sponsors that seek to introduce a new transit mode to an area to claim credits (implemented through what is commonly called a mode specific constant) for the user benefits caused by attributes of that mode beyond the travel time and cost measures currently available in the local travel model. FTA will continue to work closely with sponsors of projects that have calibrated mode-specific constants to ensure that they are using constants that are generally consistent with the methods and values permitted for sponsors of projects which are new to an area."

"FTA will assign credits for characteristics in three categories: (1) Guideway-like characteristics (equivalent to a maximum of eight minutes of travel time savings); (2) span of good service (up to three minutes); and (3) passenger amenities (up to four minutes). Further, FTA will define a discount of up to 20 percent on the weight applied to time spent on the transit vehicle. These credits and discount are applied to the calculation of user benefits only; ridership forecasts will not be affected."

This was superficially disclosed in the DEIS on p. 3-36:

“Research indicates that positive attributes (both perceived and real) are associated with the use of a fixed guideway system, which make the system more attractive than general bus transit. These benefits include such things as improved safety, security, visibility, ease of use, comfort, and reliability. These factors or attributes are not captured by the standard travel demand forecasting process. To account for these attributes in this user benefit analysis, FTA has approved an additional factor equivalent to a 14.5-minute savings of in-vehicle time. The factor was incorporated for riders taking the fixed guideway only. A 5.5-minute savings of in-vehicle time was incorporated for riders taking feeder buses to the fixed guideway.”

Basically what this indicates is that 14.5 minutes is credited to every guideway trip made, and 5.5 minutes to every feeder-bus trip, to end up with an inflated “time” benefit for guideway trips. These “savings” are then multiplied by ridership estimates. Assuming ~90,000 fixed guideway trips each day [Table 3-18], fed by ~63,000 bus trips, this additional factor adds up to a 22,000-hour time credit for fixed guideway use and a 6,000-hour time credit for feeder-bus use – for a **total credit of 28,000 hours each day** of user benefit – or over 8.6 million hours each year. The total user benefit has now increased 56% to approximately 78,000 hours each day. This total amount is nowhere disclosed in the DEIS or Technical Reports. At first glance, this might appear as an innocuous adjustment; but it becomes significant in the calculation of the “Cost-Effectiveness Index” – one of the most significant criteria in the FDA’s rating of the Project versus competing projects.

The mode-specific constants are intended to be applied to account for attributes (such as safety, security, reliability, ease of use, etc.) above and beyond the time-savings predicted in the local travel model. However, these factors are subjective and arbitrary, unless they can be validated versus other operating transit systems. The derivation of the values in the DEIS are not explained at all, so appear to be strictly arbitrary values, or values negotiated with FTA. A full and open analysis is certainly missing, and needs to be included: What data supports the claim that trains are safer than other modes? Users of the Project will need to make more transfers than with the No-Build Alternative; does this really improve ease of use?

The Washington Metropolitan Area Transit Authority reports that the incidence of crime is approximately three times greater for train transport than bus:

Crime rate per Million Riders	2004	2005	2006	2007	2008
Rail	1.76	1.65	1.69	2.17	2.76
Parking Lot	4.28	3.55	3.97	4.38	4.40
Bus	0.60	0.68	0.79	0.79	0.95

Reference: http://www.wmata.com/about_metro/transit_police/mtpd_crime_stats03.cfm

Thus, if one assumes a similar trend in Honolulu, the modal-specific constant adjustment for “safety” should be zero or negative. The point is that the modal-specific constants use in the analysis need to be thoroughly explained in the DEIS.

b) Cost-Effectiveness Index:

According to the DEIS (p. 7-9): *“Cost-effectiveness is one of the key criteria that FTA uses to evaluate projects proposed for Section 5309 New Starts funding. The FTA’s cost effectiveness*

index is a ratio formed by adding an alternative's annualized capital cost to its year 2030 operating and maintenance cost, and the total is divided by user benefits", in hours saved. Further "The cost-effectiveness indices for the Build Alternatives compared to the baseline fall within the "medium" range established by FTA for its New Starts ratings, which, along with other considerations, is currently required to qualify for New Starts funding." The key criteria for determining the cost-effective index are annualized cost of the project, ridership estimates, and the time benefits realized by the riders.

Any proposed New Starts project receiving less than a "Medium" cost-effectiveness index rating will not be recommended for funding by the FTA. The threshold between a rating of "Medium" and "Medium-Low" is \$22.99 per user benefit expressed in dollars per hour of user benefit.

According to the Alternatives Analysis, the cost-effectiveness index for the 20-mile alignment from East Kapolei to Ala Moana Center is \$21.34; and for the full project from West Kapolei to UH Manoa with an extension to Waikiki as \$27.05. Thus, the full project would not meet the threshold requirement of \$22.99, but the 20-mile alignment would.

City ordinance 07-001 defined a Locally Preferred Alternative for a fixed guideway transit system and authorized development of a minimum operable segment (MOS). The North-South Road/Airport option was recommended by Council in the ordinance for several reasons, one of which being that the cost-effectiveness index of \$22.56 was below FTA's threshold for receiving the necessary "Medium" or better cost-effectiveness rating needed to qualify for FTA's recommendation for funding. Note again that the threshold is \$22.99.

Now, in the DEIS, **the cost-effectiveness index has markedly improved** to a point that is significantly below the FTA threshold of \$22.99: **\$17.53** for the Salt Lake Alternative, **\$17.78** for the Airport Alternative, and **\$22.86** for the combined Salt Lake/Airport Alternative (DEIS Table 7-7). Information for the full project with extensions is not available in the DEIS.

We know that the capital cost and O&M costs have not reduced (perhaps have increased slightly), so that the only explanation is that the user benefits have increased significantly. As discussed above, the user benefits have increased significantly because of application of the subjective "mode-specific" time adjustment to the actual time saved. Thus, if one adds the *annualized capital cost* to its *year 2030 operating and maintenance costs*, and divides the total by the user benefits (in hours saved), the result is a number that is significantly less than reported in the AA; e.g. \$21.34 in the AA (20-mile alignment) versus \$17.53 in the DEIS (Salt Lake Alternative).

The application of this change is never clearly explained in the DEIS nor any of the supporting references. In fact, the level of detail in the DEIS on the Cost-effectiveness Index is restricted to Table 7-7. This certainly does not meet the requirement of a full and open analysis so that the public is able to make an informed decision. To the contrary, the City has disguised and concealed this information so that it is difficult to comprehend how Cost-effectiveness Index was calculated.

There is a disclaimer to the validity of the Cost-effectiveness Index calculations in the DEIS as follows:

"FTA is currently reviewing the estimates made for ridership and user benefits, operating and maintenance costs, and capital costs for the Build Alternatives. If these results hold up through

subsequent phases of project development, along with other FTA considerations, the Project would be in the competitive range for funding consideration.” (DEIS p. 7-9)

It is imperative that this whole area be scrutinized by the FTA, so that the merits of the project are accurately determined prior to issuance of an ROD.

It is also noteworthy that the City has not included any discussion of the Cost-effectiveness Index of the Full Project as was done in the AA. One can surmise that it would be significantly higher than for the Project, and was intentionally excluded since it still might exceed the FTA threshold of \$22.99 (my estimation is that it would be between \$22 and \$24).

One final note on Cost-effectiveness Index: Since the Honolulu Project utilizes an elevated guideway along the entire length it would be expected to cost 3 to 4 times as much as an “at-grade” system. Operations and Maintenance costs are expected to be higher than an at-grade system because of the higher infrastructure cost. User benefits (time saved) are expected to be the same as any rail transit system of similar size. Thus, with the significantly higher cost of the elevated system, it is difficult to rationalize how the Honolulu Project could have a Cost-effectiveness Index that is competitive with other projects on the FTA docket.

The discussion in the DEIS needs be expanded to elaborate the derivation of User Benefits data and Cost-effectiveness Index – in detail at least as extensive as in the Alternatives Analysis. The dramatic reduction in the Cost-effectiveness Index reported in the DEIS versus in the AA needs comprehensive explanation, and how this change will influence the FTA’s evaluation of the Project. The FTA should explain how this project could be competitive with other projects with respect to this important rating criterion, considering its extremely high capital cost.

C. Validity of Model Predictions and Interpretation:

Many of the conclusions drawn throughout the evaluation process are based on predictive transit and traffic models commonly used for such evaluations. They are commonly used by most large cities for transit planning, and are usually tailored for the specific city or area. It is impossible for the layman to understand the operation of these models and their inputs and outputs (e.g., screenline analysis, vehicle miles traveled, vehicle hours traveled, vehicle hours of delay, transit ridership, transit time saved, etc), so we must rely on what is reported by the users of the models.

In the DEIS, these model predictions are reported as the gospel truth; the results are not reported as ranges, but as specific values; no probabilities are assigned concerning the confidence of the values reported. It is unreasonable that we should be expected to accept these predictions at face value. At a minimum, the DEIS should at least disclose that there is uncertainty around predictive model outputs, and report a range of probable output values that reflects the range of reasonable inputs into the model, and assign a probability of confidence to the values or ranges reported. Within the DEIS and supporting references, the discussion around confidence level or uncertainty around the values is conspicuously absent.

The disparity between model predictions and actual transit ridership validates the need to report model predictions as ranges or to assign confidence probabilities. For the majority of rail transit systems put into operation within the last 30 years, actual ridership has not met ridership predictions; a few have exceeded prediction. For many of these cases, actual ridership might fall within a predicted range , and thus give greater credibility to the entire process.

The “*Honolulu High-Capacity Transit Corridor Project Alternatives Analysis Travel Demand Forecasting Results Report*” (RTD 2008t, October 2008) addresses changes made in the Travel Demand model, but does not address validation of the model. In fact the Report is elusive in describing details. For example in the section on Adjustment of the Mode Choice Model, it says “*The mode choice model was re-calibrated as part of the Draft EIS process; however, the details of it are not discussed in this report*” (p. 1-3). Regarding calibration and validation of the model, the Report states: “*The 2005 model was calibrated as a result of all of the changes discussed. Calibration Target Values were assigned and applied to the model. Details regarding the calibration and validation process, including the specific Calibration Target Values, can be found in the Honolulu High-Capacity Transit Corridor Project Travel Forecasting Methodology Report (RTD 2006)*” (p. 1-5).

There are several examples from the DEIS that prompt one to question the validity of these models or whether the data is being reported accurately:

a) Ridership Model:

DEIS Table 3-17 shows Fixed Guideway ridership for the three Alternatives. It seems inconsistent that ridership for the “Airport & Salt Lake” Alternative (92,710 daily boardings) is less than for the “Air Port” Alternative (95,310). One would certainly think that the Airport & Salt Lake Alternative, with one additional station than the Airport Alternative, would have greater ridership than the Airport Alternative alone. Perhaps there is good rationale for this, but it is certainly not disclosed in the DEIS.

It is also curious that the data in Tables 4-21, 4-22, and 4-23 of the *Travel Demand Forecasting Results Report* (RTD 2008t) are significantly greater than reported in the DEIS (although the data in Appendix A of the Forecasting Results Report (RTD 2008t) are the same).

	DEIS Table 3-17	RTD 2008t Tables 4-21, 22, 23	RTD 2008t Appendix A
Salt Lake:	87,570	102,174	87,571
Airport:	95,310	120,231	95,305
SL & AP	92,710	108,179	92,707

Perhaps there are explanations (that are not obvious to the reader) for this “curious” data, but they are not discussed in the DEIS or Technical report (RTD 2008t).

Side note: As a point of reporting accuracy, there is obviously a gross error in Table 4-11 of the *Travel Demand Forecasting Results Report* (total AM peak hour volume of 93,410 appears to be off by factor of ~10). Perhaps the wrong spreadsheet was inserted.

b) Calculation and Interpretation of Congestion Data:

The *Oahu MPO* Travel Demand Forecasting Model is the primary tool for predicting future traffic patterns and transportation-related effects. The tables below show data extracted from the DEIS for Vehicle Miles Traveled per day (VMT/d), Vehicle Hours Traveled per day (VHT/d), and Vehicle Hours of Delay per day (VHD/d). A primary measure of traffic congestion in the DEIS (and AA) is based on “Vehicle Hours of Delay” (VHD) for each

transportation scenario. It is not clear from the DEIS how VHD is calculated in the model; nonetheless, if we take the data at face value, the following can be concluded:

- In 2030, if the Project were not built, VHD would be 43.2% greater than in 2007 (even with planned roadway improvements); e.g., “congestion” would be 43.2% greater.
- In the build scenarios, congestion in 2030 would be 10.8-13.5% greater than today
- In the build scenarios, congestion in 2030 would be 20.8-22.6% less than the 2030 No Build scenario.

From DEIS Tables 3-9 and 3-14

				% Change from 2007		
	VMT/d	VHT/d	VHD/d	VMT/d	VHT/d	VHD/d
2007	11,581,000	334,000	74,000			
2030 no-Build	13,583,000	415,000	106,000	17.3%	24.3%	43.2%
2030 Salt Lake	13,096,000	385,000	84,000	13.1%	15.3%	13.5%
2030 Airport	13,086,000	385,000	82,000	13.0%	15.3%	10.8%
2030 Both	13,103,000	386,000	83,000	13.1%	15.6%	12.2%

	% Change from 2030 no build		
	VMT/d	VHT/d	VHD/d
2030 Salt Lake	-3.6%	-7.2%	-20.8%
2030 Airport	-3.7%	-7.2%	-22.6%
2030 Both	-3.5%	-7.0%	-21.7%

Similar data is presented in the AA (below).

From AA Table 3-10

				% change from 2005		
	VMT/d	VHT/d	VHD/d	VMT/d	VHT/d	VHD/d
2005	11,206,000	305,000	57,000			
2030 no-Build	13,971,000	395,000	82,000	24.7%	29.5%	43.9%
2030 20-Mile	13,539,000	376,000	73,500	20.8%	23.3%	28.9%
2030 MLA Rev	14,034,000	397,000	82,500	25.2%	30.1%	44.7%
2030 MLA* Rev	14,050,000	387,000	72,500	25.4%	26.9%	27.2%

	% Change from No Build		
	VMT/d	VHT/d	VHD/d
2030 20-Mile	-3.1%	-4.8%	-10.4%
2030 MLA Reverse	+0.5%	+0.5%	+0.6%

2030 MLA* Rev	0.6%	-2.0%	-11.6%
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**MLA reversible case with H-1 zipper in place (estimated)*

Comparing the DEIS data with the AA data, the following differences stand out:

- VHD for the 2030 No Build case in the DEIS is 29% greater than the 2030 No Build case in the AA (106,000/82,000); although VHD for the 2030 Build cases are only ~13% greater than for the 2030 20-mile alternative in the AA (~83,000/73,500).

- Existing condition (2005 or 2007) VHD is 30% greater in the DEIS than in the AA, although VMT is only 3% greater. One would think that the increase in VHD would be much smaller for a 3% increase in cars on the road (VMT).

Ultimately the Build Alternatives provide congestion relief (improvement in VHD) when compared with the No Build Alternatives of 10.4% in the AA and ~21-23% in the DEIS.....or to put it in the Administration's words: "a 100% improvement in congestion." Lacking good explanation in the DEIS, this sudden improvement is difficult to rationalize or understand. The impression that was left with the public is that the benefits of the Build Alternatives are much greater than previously anticipated – just what the Administration intended. Nothing was said about the accuracy or calibration of the models as a possible explanation.

The underlying uncertainty is whether the travel models are providing reliable data. Predictive models calculate future conditions based on the model's algorithms (mathematical manipulations via equations) and input data (including from other models). Algorithms can be optimized to try to better suit local conditions. Overall, getting a predictive model to make accurate predictions (validated) is an extremely difficult undertaking. If the assumptions that go into the model are not validated, the accuracy of the output can be in question. An obvious validation point lies in the comparison of 2005 traffic data (actually measured existing condition) with that predicted for 2007. Unfortunately, I do not believe that "actual" 2007 data has been gathered, and thus, validation is not possible.

To demonstrate the point that it is an easy matter to achieve an entirely different outcome from small, and explainable differences in input data, I have added an "new" alternative into the AA Alternatives evaluation: a Managed Lane Alternative with the reversible lane option, but using the H-1 zipper lane as an added lane (H-1 zipper was not used for the reversible MLA option). I have assumed a reduction in daily delay of 10,000 hours, which is equivalent to a 2.4-minute savings for each of the 250,000 cars that would benefit from this option. This option is included at the bottom of the above table (in gray font). Isn't it amazing that this option reduces congestion 11.6% versus 10.4% for the 20-mile AA Build Alternative! If I had access to the model, I could just as easily have "optimized" inputs and algorithms to get a similar result.

The main point in this example is that even small differences in model predictions can influence data used in making key decisions. In this case, the MLA Alternative looks considerably better than originally portrayed in the AA. Is the congestion relief quoted in the DEIS really 100% greater than in the AA? Certainly not; it is only 12% better (23% minus 11%).....or maybe not even that....I really do not know because the accuracy of the model has not been validated!

The magnitude of this Project requires that the City demonstrate through substantive assessment and analysis that all of the information used in the evaluation and selection of alternatives is accurate and can be validated within reasonable confidence levels.

D. Project Risks and Uncertainties

Section 6.5 of the DEIS (Risks and Uncertainties) is designed to explain the financial "risks" associated with the Project; but in reality, it is more a compilation of "uncertainties" rather than a comprehensive analysis of the risks and potential consequences of these uncertainties, and a plan to mitigate their impacts on the Project. As a result, the reader (and thus general public) is

unaware of the impact these financial uncertainties could have on the Project and on the financial stability of the City.

With respect to FTA's *"Risk Analysis Methodologies and Procedures"*, June 2004, it appears that the City has completed the first two "Prepare" and "Identify" steps of the risk analysis process, but has neglected to "Quantify" or "Assess" the magnitude of the risks, or established a plan to "Mitigate" the risks). Rather, the City has reserved a large "contingency" in the Project budget to cover the risks and uncertainties. The FTA discourages this approach, and suggests that a comprehensive risk analysis is a tool for better communication and more cost-effective project management, and thus minimizes the need for large contingencies.

The risk assessment should anticipate the following events and a plan to mitigate their consequences:

- GET surcharge fund plus New Starts funding is not sufficient to meet Project capital costs (including interest costs). Right now there is no assurance that the GET revenues will meet the anticipated \$4.054 Billion, or New Starts funding will meet expectations. The DEIS states that additional funding would be possible to fund the capital needs of the Project, but does not specifically identify the source except by reference to "complemented by local assistance" (Section 6.2.2). Does this mean local taxes (State and City) will increase to cover the gap? Will the GET be extended beyond 2022? Will funds be transferred from the General and Highway funds (at the expense of other infrastructure projects)? Will the project be stopped short of Ala Moana Center? How will the Extensions be financed?

The City needs to be more specific in defining sources of additional funds, and if in the form of General Revenue Bonds or "borrowed" from other City funds, how they will be repaid.

- Fare revenues are not sufficient to cover 27 to 33% of O&M costs or total transit subsidies exceed 15% of General and Highway fund revenues. What will be the source of additional funds?
- Construction delays or stoppage by discovery of Archaeological and Cultural Resources; construction impediments caused by concerned groups. Virtually every major construction project on Oahu has been either stopped or significantly delayed because of anticipated or actual discovery of Archaeological Resources. There will be no exception for this project. The City should expect construction delays of uncertain length. The impact of this scenario needs to be addressed in the financial Risk Analysis.
- Operating risks. In addition to those mentioned in the DEIS there is a risk that speeds will have to be reduced or headways extended for a variety of reasons: e.g., longer stops needed at stations, too noisy in sensitive residential neighborhoods. This will have a definite impact on cost. The financial implications of these situations on operating costs and/or cost of mitigation need to be assessed.

A major concern of many residents is the impact that cost over-runs (either capital or operational) will have on quality-of-life programs for the benefit of the general public, such as: parks, recreational facilities, road quality. This concern extends to the impact that higher taxes will have on disposable income, and thus quality-of-life on a daily basis for each individual and family.

FTA guidelines indicate that a comprehensive Risk Analysis has the potential to increase efficiency and reduce project costs. It is imperative the risks associated with this Project be addressed in much greater detail in the SEIS or FEIS.

E. Economic Impact

The DEIS must meet the requirements of both Federal and State EIS standards. It is clear from Hawaii Revised Statutes Chapter 343 that the DEIS should disclose *“the environmental effects of a proposed action, effects of a proposed action on the economic welfare, social welfare, and cultural practices of the community and State, effects of the economic activities arising out of the proposed action, measures proposed to minimize adverse effects, and alternatives to the action and their environmental effects.”*

Section 4.2 of the DEIS (*Economic Activity*) assesses the impact of the Project on specific economic elements in the study corridor, but fails to consider the more global economic impacts on the economic welfare and social welfare of the community (island of Oahu) either in this section or in cumulative effects. It covers the impact on employment, and the positive and negative impacts the Project will have on property values and tax revenues for properties near the guideway. But it fails to address the Project’s impact on property taxes for all property owners on Oahu.

It also fails to assess the impact that capital costs of the Project will have on the long-term *economic and social welfare* of the people, or on other infrastructure projects (e.g., roads, sewers, parks) and social programs. Financing of the Project capital cost via the GET surcharge costs each individual on Oahu ~\$125-150 each year (~\$500-600 per family) and will continue for 16 years through 2022. In total, each family will contribute ~\$20K (YOE \$s) towards the capital cost of the project. The 0.5% GET surcharge has already impacted the lives of many residents, and could impact many more because of the economic downturn in the local and national economy. The GET is a regressive tax and thus impacts the economic (and social) welfare of lower-income families more than higher-income families. There is no mention of these effects in the DEIS or supporting references.

Any shortfalls in Operating and Maintenance costs are *“assumed to be funded through City subsidies from its General and Highway Funds”* (DEIS p. 6-10). Today, Operating and Maintenance subsidies represent ~10% of the County’s General Fund (which is 70% funded by property tax revenues) and are expected to increase to 14-15% in 2018 (DEIS Fig. 6.3). This translates to an increase of ~\$40M to \$50M (2008 \$), or ~\$44 to \$55 for each resident each year (~\$170 to 220 per family), which will be have to be funded by an increase in property tax of ~5 to 6% (despite the Administration’s denial that there will be a need to increase property taxes for this purpose).

Note to correct misstatement in DEIS: To rationalize the curve in Figure 6-3 (resulting in a concomitant lower O&M cost as % of General Fund since 2002), it is stated in the DEIS, p.6-7, that “*City revenues have increased, as a result of large increases in real estate values on O’ahu ...*”. This is a statement that the City has used repeatedly to rationalize why real estate taxes (revenues) have increased dramatically over the past five years. The corollary to this statement must also apply: *City revenues will decrease as a result in decreases in real estate value*. But this corollary will prove to be incorrect because of City statute. In reality, real estate revenues have increased because of increases in the City’s operating budget (and thus need for additional revenues) proposed by the Administration and approved by City Council; real property taxes, according to the City’s ROH Sec. 8-11.1, are determined by the product of real property values times the tax rate – and not real property values alone. In fact if real property values decreased during the same period, statute requires that the tax rate increase to provide sufficient revenue to support the budget.

The City’s share of project cost of \$4.2 billion (YOE) will be irretrievably lost from other projects (e.g., sewer repair and maintenance, sewage facility upgrades, H-power waste-to-energy expansion, landfill expansion/relocation, road repair and maintenance, etc.), and the community may not have the resources to fund both the Project and these other necessary projects. There should be no dispute that the Project will have a significant impact on the economic and social welfare of residents of Oahu. It is critical that the EIS evaluate these impacts.

F. Omission of Extensions from detailed discussion in the DEIS

The thesis on the first page of this discourse is amplified by the omission of the three “planned extensions” (to West Kapolei, University of Hawaii at Manoa, and Waikiki) from detailed analysis and discussion in the DEIS. The extensions are covered superficially as “cumulative” effects; even though the latter two extensions have greater potential impact on the environment (and cost) than the defined “Project” (Minimum Operable Segment). The Locally Preferred Alternative should not have been segmented into the “Project” plus three extensions for this EIS, but evaluated in its entirety. To cover the extensions as “cumulative” effectives does injustice to the process and the public. The use of the term “First Project” to describe the “Project” indicates full intention to complete the Locally Preferred Alternative at some point. Admittedly, inclusion of the extensions might change the overall conclusions of the DEIS – which is all the more reason for including them.

G. Air Quality (Section 4.8)

This section compares “regional [Oahu] mobile source pollutant burdens” for the three Build Alternates and the No Build.

“Air quality effects predicted to result from the Project’s operation are based on the anticipated vehicle miles traveled (VMT) and average network speed for each alternative.” (p. 4-94)

“If the electricity used to operate any one of the Build Alternatives is generated by combustion, this may produce additional emissions. However, these emissions would be offset in whole or part by the reductions generated by reduced VMT. Furthermore, power plant emissions may be much more easily controlled than emissions from individual automobiles.” (p. 4-95)

These two statements indicate that pollution burdens of the four Alternatives have been calculated based solely on VMT, and that pollution caused by generation of electricity used by the Project is not included. The most audacious and ludicrous statement is that “*power plant*

emissions may be much more easily controlled than emissions from individual automobiles.” At the present time there is no cost-effective process to do this, and none is foreseen in the immediate future.

To the best of my knowledge, electricity from the project will come from HECO; 90% of whose energy comes from combustion of fossil fuels and trash. It is unlikely that this situation will change significantly in the future. If one considers this additional pollution source, the pollution generated by all four Alternatives is essentially the same, making the following statement false:

“It is anticipated that the Project would reduce regional pollutant emissions by between 3.2 to 4.0 percent (varying by Build Alternative) compared to the No Build Alternative (Table 4-12)”.(p. 4-95)

In addition, the analysis does not reflect or even consider the impact of improved automobile efficiency (which is guaranteed to happen).

H. Downtown Station Location (a curious situation)

The Dillingham Transportation Building is one of the most architecturally and historically significant buildings in downtown Honolulu; it is on the Hawaii Register of Historic Places. Yet, the current plan is to locate the entrance to the Downtown Station in full view of (and partially encroaching into) the building’s courtyard. Several alternatives have been considered, but all have been dismissed for a variety of reasons.

However, one of the alternatives requires comment. The “Fort Street” location would move the whole station in the Ewa direction to Fort Street with an entrance at either Walker Park or the Fort Street Mall on the mauka side of Nimitz and an entrance in Irwin Memorial Park on the makai side. A modification to this plan would be to place the mauka entrance *Koko Head* side of Walker Park on private TMK parcel 21013006. This alternative would completely avoid affecting the Dillingham Transportation Building and Walker Park. What is most interesting in the DEIS are the explanations on why this location is not feasible:

“However, this station location would require a 250-foot curve radius to maintain a minimum distance between the edge of the station platform and end of curve. A 250-foot curve radius is substantially less than the Project’s design criteria of 500 feet. Such a tight radius would necessitate reducing speeds to 5 to 10 miles per hour, which is substantially below the Project’s design speed of 30 miles per hour. This would result in increased travel time and a substantial decrease in user benefits.” (p. 5-34) First, the current design radius is 600 feet, and with only slight changes in alignment on Nimitz Avenue, a radius of 500 feet could be maintained. Secondly, this curve is right at the entrance/exit to the station, and all trains should be going less than 10 miles per hour at that point.

“Additionally, placing an entrance makai of Nimitz Highway would impact Section-4(f)- protected Irwin Memorial Park, and a mauka entrance would block either the Fort Street Mall or Walker Park, another Section 4(f) resource.” As discussed above locating the entrance on private property on the mauka side of Nimitz eliminates the 4(f) concern there, and even though location of the makai entrance in Irwin Park represents a 4(f) impact, it has less historical and architectural significance than locating it next to the Dillingham Transportation Building.

Thus, this location seems to be pretty attractive. One wonders what the real reason is for locating the station in front of the Dillingham Transportation Building with an entrance in the adjacent courtyard.

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February 5, 2009

To: Mr. Wayne Y. Yoshioka
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City and County of Honolulu
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CC: Mr. Ted Matley
FTA Region IX
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San Francisco, CA 94105

Comments on Draft EIS Chapter 4.9 (Noise and Vibration) and Technical Report RTD 2008f
(Honolulu High-Capacity Transit Corridor Project Noise and Vibration Technical Report, October 2008)

Dear Mr. Yoshioka:

I have broken my comments into three separate areas with respect to Chapter on Noise:

- I. The DEIS and Technical Report do not meet the full-disclosure requirements specified in FTA's "Transit Noise and Vibration Impact Assessment" Manual (FTA-VA-90-1003-06, May 2006). It is imperative that modifications to the DEIS be made or included in a Supplementary EIS to satisfy these requirements.
- II. The noise impact criteria methodology used in the DEIS does not adequately address noise impacts for all situations along the guideway. The City should review each of the areas cited in these comments and address them accordingly in the Final EIS or SEIS.
- III. Lack of accountability for operating within noise standards. Since there are no City or State statutes for regulation of noise from mobile sources, objectionable noise from Project operation will be difficult control. It is imperative that appropriate statutes be adopted prior to start-up of any segment of the First Project.

Each of these areas is discussed in detail below. If you have any questions, please feel free to contact me by phone or email.

Respectfully yours,



Richard W. Ubersax

P.S.: I have also sent an electronic copy to you via email.

CONCLUSION:

It will be evident from the discussion that follows that the DEIS has not adequately analyzed noise along the guideway and has grossly underestimated the impact that noise generated by the Project will have on the quality of life of residents living close to the guideway. The DEIS “Summary of Environmental Effects” (DEIS Table 4-1) relating to noise indicates that there will be numerous “Moderate Impact” locations along the guideway, and that *“no feasible and reasonable mitigation is available to reduce moderate noise impacts that remain”*. The number of impacted sites would be much higher, and the level of impact would be more severe if the assessment:

- a) followed the guidelines and recommendations in the FTA “Transit Noise and Vibration Impact Assessment” Manual
- b) considered the open door and window lifestyle of our people, and
- c) extended the study to include the instantaneous noise from each passing train

The ultimate message one gets from the DEIS is that there will be objectionable noise – although grossly understated – and that the City expects us to live with it or deal with it later. The time to deal with it is now, and not later.

It is understandable that the City has tried to gloss over the negatives of the Project; but it is unacceptable to push the Project forward while knowing the problems – and expect the people to accept it. If there is no way to mitigate the impact of noise (or other environmental effects) along sections of the guideway, a new design or route needs to be devised. Anything less is a gross injustice to the people. None of the three Build Alternatives is acceptable in their current form.

I. The DEIS and accompanying Technical Report do not satisfy the “full disclosure” requirements of NEPA.

Although the DEIS and Technical Report RTD 2008f provide much useful information on the fundamentals of noise generation, measurement, assessment criteria, impacts, and mitigation, they do not provide all of the information recommended by the FTA in the “Transit Noise and Vibration Impact Assessment” Manual (FTA-VA-90-1003-06, May 2006).

With respect to recommendations provided in the FTA Manual:

A. General

“To be effective, the noise and vibration analysis must be presented to the public in a clear, yet comprehensive manner. The mass of technical data and information necessary to withstand scrutiny in the environmental review process must be documented in a way that remains intelligible to the public. Justification for all assumptions used in the analysis, such as selection of representative measurement sites and all baseline conditions, must be presented for review.” (FTA Manual page 13-1)

Although the Technical Report provides significantly greater detail than the DEIS, it does not provide sufficient detail to withstand “scrutiny” by the informed reader. There are remaining questions regarding the protocol used for determining existing noise, estimating project noise, evaluating noise impact at specific locations, and validation of mitigation measures.

There is also concern about the Project's planned extensions to UH Manoa and Waikiki not being covered in detail in the DEIS.

The Technical Report addresses this issue in the Preface:

"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 technical report documents the detailed analysis completed for the Full Project, which includes the planned extensions, related transit stations, and construction phasing. The planned extensions and related construction planning have not been fully evaluated in the Draft EIS and are qualitatively discussed in the Cumulative Effects section of the Draft EIS as a foreseeable future project(s). Once funding is identified for these extensions, a full environmental evaluation will be completed in a separate environmental study (or studies), as appropriate."

The extensions are an integral part of the ORTP 2030 plan and should be assessed with the same degree of detail in the DEIS as the three Project "alternatives" (Salt Lake alternative, Airport Alternative, and Airport & Salt Lake alternative), especially since the noise impacts of these extensions are expected to be greater and more difficult to mitigate than for the Project. The fact that the DEIS uses the term "First Project" as a descriptor for the "Project" fully indicates that the City's intent is to complete the Full Project, and thus the extensions should be treated with the same level of detail in the DEIS as the Project.

B. Existing Noise

"Measurement procedures should be fully described. Tables of measurement instruments should include manufacturer, type, serial number and date of most recent calibration by authorized testing laboratory. Measurement periods, including time of day and length of time at each site should be shown to demonstrate adequate representation of the ambient conditions. The measurement data should be presented in well organized form in tables and figures." (FTA Manual p. 13-2)

Neither the DEIS nor Technical Report adequately describe details of the methods used for measuring the ambient sound levels at each receptor site. The following information should be included:

- detailed description of measurement instruments and calibration documentation
- precise location of receptor sites (exact coordinates including elevation); location of identified sensitive sites relative to each receptor site (including elevation); location of sensitive sites relative to guideway
- precise time of measurement including day of week, time of day, length of time
- assumptions made in calculations of L_{max} , L_{eq} , L_{dn} , etc.
- unusual occurrences and treatment thereof

C. Prediction of Future Project Noise

"The prediction model used for estimating future project conditions should be fully described and referenced. Any changes or extensions to the models recommended in this manual should be fully described so that the validity of the adjustments can be confirmed. Specific data used as input to the models should be listed. Computed levels should be tabulated and illustrated by contours, cross-sections or shaded mapping. It

is important to illustrate noise/vibration impacts with base maps at a scale with enough detail to provide location reference for the reader.” (FTA Manual p. 13-2)

Neither the DEIS nor Technical Report describe the methodology used for estimating project noise. The following information should be included:

- detailed description of prediction model, and if different from that recommended in FTA-VA-90-1003-06, the justification for deviation; any adjustments to the model should be described in detail.
- specific data used as input to the model should be described including:
 - source reference noise level (unmitigated and mitigated) with supporting details (i.e., vehicle configuration, vehicle speed); details of mitigation techniques and comprehensive justification of mitigated levels (i.e., effect of skirts and parapet wall independently, and combined effect)
- tabulated results for each specific receptor (and relevant impacted sensitive sites) with all assumptions disclosed
- precise distance between receptor and source
- location of receptors (and sensitive sites) relative to source (i.e., distance above/below source)

It is not clear from the DEIS or Technical Report whether the noise impact of vehicles on opposite tracks are treated the same, or whether converging trains are treated. The distance of the train from the receptor, and mitigation by the intervening parapet wall (and thus the noise impact) will be different depending on train direction. This situation should be analyzed and treated appropriately (with explanation) in the FEIS/Technical Report.

Similarly, the DEIS and Technical Report do not address the impact of reflection of sound energy at locations where the guideway traverses in close proximity to buildings on both sides (e.g., Halekauwila Street, etc., UH Manoa extension, Waikiki extension). If it is determined that reflection is inconsequential, it should be stated with appropriate justification. If not, it should be addressed in the assessment.

The DEIS and Technical Report depict noise impact data as distinct individual points along the guideway at ground-floor elevations (except in locations that included buildings of four or more stories). In the FTA manual, it is recommended that impacts be presented in the form contour maps. It would be highly desirable to represent these contours as a function of distance from the guideway as well as overlays to represent elevations above and below the guideway. The maps should be presented in a scale with enough detail to precisely determine distance of each contour line from the guideway. A format similar to DEIS Appendix A would be acceptable, but at 1” = 100’ scale).

D. Mitigation

“The mitigation section of the technical report should begin with a summary of all treatments considered, even if some are not carried to final consideration. Final candidate mitigation treatments should be considered separately with description of the features of the treatment, costs, expected benefit in reducing impacts, locations where the benefit would be realized and discussion of practicality of implementing alternative treatments. With respect to noise impacts, enough information is to be included to allow the project sponsor and FTA to reach decisions on mitigation prior to issuance of the final environmental document.” (FTA Manual p. 13-3)

The project already includes an integrated noise-blocking 3'-high parapet wall on each side of the guideway and a system specification for vehicles with wheel skirts. The parapet wall is expected to reduce noise at or below track level, and the skirts to reduce noise at or above track level. Each data point in the DEIS represents the noise impact with the wall and skirt mitigation measures in place; while Appendix A of the Technical Report, provides project noise impacts with and without these mitigation measures. From Appendix A, it is clear that project noise would be "severe" or "moderate" at most receptor sites without the prescribed mitigation measures. Since the proposed mitigation methods provide only an estimate of actual noise attenuation, it is possible that many of the sites listed as "no impact" could actually be "moderate impact" and sites listed as "moderate impact" could actually be "severe impact".

In situations where noise-sensitive sites exist above the guideway, additional mitigation measures might be needed because of reflection from the guideway surface and lower efficiency of the parapet walls. These sites should be identified and additional mitigation measures identified. The DEIS and Technical Report address this issue to some degree, but it would be highly desirable to include specific recommendations and supporting data to support the recommendations.

The FTA Manual recommends that a summary of "all" treatments considered. Although the Technical Report mentions two additional measures, there are numerous others available (such as an additional wall on the centerline of the guideway). These should be described in detail (along with the benefit expected).

The FTA Manual discusses operational restrictions as a means to mitigate noise, but does not impose them because of their impact on system efficiencies, economics, etc.

"Two changes in operations that can mitigate noise are the lowering of speed and the reduction of nighttime (10 pm to 7 am) operations. Because noise from most transit vehicles depends on speed, a reduction of speed results in lower noise levels. The effect can be considerable. For example, the speed dependency of steel-wheel/steel-rail systems for L_{eq} and L_{dn} (see Table 6-4) results in a 6 dB reduction for a halving of the speed. Complete elimination of nighttime operations has a strong effect on reducing the L_{dn} , because nighttime noise is increased by 10 decibels when calculating L_{dn} ." (FTA Manual p.6-41).

The City should anticipate reducing speed in noise-sensitive areas (below the 45 mph initially planned), and incorporate this scenario in the financial risk analysis section of the DEIS.

The maximum acceptable limits for project noise should be specified in the FDIS (or SEIS), along the length of the guideway (depending on noise impact sensitivity). Shortly after commencement of system operation, detailed measurements should be made to ensure compliance with these limits.

To further ensure that noise from the project is within acceptable limits, City Council (or if necessary, State Legislature) should legislate noise limits along the guideway. Prior to issuance of the FEIS, a written commitment from the City (or State) should be made to pass legislation prior to start up of the project that specifies maximum noise allowed at residential building setbacks and requires a reduction in speed if Project noise level exceeds specification until other mitigation measures can be implemented.

II. The DEIS noise impact criteria methodology does not adequately address noise impacts in all situations:

A. FTA criteria underestimate actual noise impact by use of L_{dn} or the L_{eq}

The FTA criteria incorporate average noise measurements and de-emphasize short-term noise occurrences. However, in some cases, the use of L_{max} , or the maximum noise recorded over a short time interval, is a more meaningful measure of unacceptable noise level, as explained in the FTA Manual:

The assessment of noise impact in this manual utilizes either the L_{dn} or the L_{eq} descriptor. As such, in determining impact it is not necessary to determine and tabulate the maximum levels (L_{max}). However, it is often desirable to include computations of L_{max} in environmental documents, particularly for rail projects, because the noise from an individual train pass by is quite distinguishable from the existing background noise. The L_{max} is also the descriptor used in vehicle specifications. Because L_{max} represents the sound level heard during a transportation vehicle pass by, people can relate this metric with other noise experienced in the environment. Particularly with rail transit projects, it is representative of what people hear at any particular instant and can be measured with a sound level meter.” “Thus, although L_{max} is not used in this manual as a basis for assessing noise impact, it can provide people with a more complete description of the noise effects of a proposed project and should be reported in environmental documents.” (FTA Manual p.6-29)

“Although the maximum noise level (L_{max}) is not used in this manual as the basis for the noise impact criteria for transit projects, it is a useful metric for providing a fuller understanding of the noise impact from some transit operations. Specifically, rail transit characteristically produces high intermittent noise levels, which may be objectionable depending on the distance from the alignment. Thus, it is recommended that L_{max} information be provided in environmental documents to supplement the noise impact assessment and to help satisfy the “full disclosure” requirements of NEPA.” (FTA Manual p. 3-9)

This is an especially critical issue in residential areas that are in close proximity to the guideway (<100 feet). In many cases, transit vehicles will pass well within 100 feet, and in some cases as close as 30 feet of windows in residential areas. In these situations, L_{max} would be a more meaningful noise descriptor.

In Hawaii’s tropical climate, it is often necessary to keep windows and doors open for personal comfort since many residences do not have air conditioning. In this case, the actual noise of the passing train, L_{max} , is the best measure for judging the real-life impact of the event. Although the FTA noise impact classification might be “No Impact” or “Moderate Impact”, affected residents will perceive it as being “Severe Impact”. Air conditioning as a mitigation measure would not be accepted by the tropical culture, and would increase the electrical burden of the public.

Neither the DEIS nor Technical Report address this issue even though many residential properties will be severely affected. It is imperative that these issues be addressed in the FEIS or SEIS.

B. FTA criteria underestimate actual noise impact by applying criteria “outside” of residential building locations

“For residential land use, the noise criteria are to be applied outside the building locations at noise-sensitive areas with frequent human use including outdoor patios, decks, pools, and play areas. If none, the criteria should be applied near building doors and windows.” (FTA Manual p. 3-10)

As discussed above, the nature of the climate and lifestyle require windows and doors to be open, in some cases year-round. In typical residential construction (double-pane windows and doors), noise can be mitigated by as much as 25 dB; but in Hawaii, with doors and windows open most of the time, the actual noise can be much louder than indicated by the FTA criteria, and thus, although classified as “No Impact” or “Moderate Impact”, should actually be classified as “Moderate Impact” or “Severe Impact”.

Neither the DEIS nor Technical Report address this issue even though many residential properties will be adversely affected. It is imperative it be addressed in the FEIS or SEIS.

C. FTA criteria underestimate actual noise impact by referencing to ambient noise

The FTA criteria for project noise impact is based on average project noise levels compared to average background (ambient) noise levels: higher project noise is permitted at higher ambient noise levels. However, in many cases, the absolute total noise level (sum of ambient and project) should be used to establish the impact of the project on noise severity as described in the FTA Manual:

“Ambient levels above 65 dB (L_{dn}) are considered “normally unsatisfactory” for residential land use by the Department of Housing and Urban Development. Thus there is a stronger need for mitigation if a project is proposed in an area currently experiencing high noise levels from surface transportation. An example would be a project where additional commuter tracks are added to a very busy rail corridor. If this project were placed in a less noisy environment, the impact assessment might show a Severe Impact, but when the project is overlaid on an existing noisy environment, the result could be Moderate Impact or, possibly, No Impact. However, in this situation the new cumulative noise environment may be very objectionable because people will not be compartmentalizing the existing noise versus the new noise and reacting only to the new noise. In this circumstance impacts predicted in the Moderate range should be treated as if they were Severe. (FTA Manual p. 3-12)

In the FEIS or SEIS, every receptor site should be assessed to determine how application of this criterion would affect the noise impact rating.

D. FTA criteria underestimate actual noise impact by time averaging technique

Ambient L_{dn} is averaged over the full 24-hour day, and remains the same whether the Project is operating or not. Noise generated by the Project (L_{dn}) is also a 24-hour average, but the Project is not expected to operate during the nighttime hours of midnight to 4 AM. During this period, project noise is “zero”, so the calculated Project L_{dn} is lower than if trains were running through the night. This calculated L_{dn} could result in a reduction in noise impact from “Severe Impact” to “Moderate Impact” (or “Moderate Impact” to “No Impact”) even though the instantaneous impact (L_{max}) for each train passing is the same, independent of pass-by frequency.

The same effect would be realized if the frequency of passing a specific receptor site were to be reduced, e.g., by increasing headway. Illustrative of this concept is in the comparison of common receptor sites along the Salt Lake Alternative versus the Salt Lake & Airport Alternative. The frequency of passing trains along Salt Lake Blvd for the Salt Lake & Airport Alternative will be one-half of that for the Salt Lake Alternative. Thus, the calculated project noise levels (L_{dn}) for receptors along Salt Lake Blvd for the Salt Lake & Airport Alternative are significantly lower than

for the Salt Lake Alternative. The consequence is that the five high-rise apartments along Salt Lake Blvd (receptors O and 16) are reduced in noise impact from “Moderate” to “No Impact” in the Salt Lake & Airport Alternative, even though the actual noise from each passing train is the same in either case.

These factors should be explained in the FEIS or SEIS so that the general public – especially those living close to the guideway– has a fuller understanding of the adverse impacts of the Project.

III. Accountability

At the present time, there are no State or County statutes for regulation of noise resulting from transit operations on the guideway. Without these statutes, it is virtually impossible for residents to force mitigation through legal channels. The City has no incentive for mitigation; in fact, it has a disincentive in that any mitigation will result in higher capital and/or operating cost. It is imperative that such statutes be enacted (with full involvement of the public) prior to commencement of service. Such legislation should require reduction in speed as an interim mitigation measure until permanent physical mitigation can be implemented.

(Note: HAR 11-46 is the correct statute for stationary noise listed on DEIS p. 4-98, and not 11-16)

It is unsettling that the City and its consultants have not addressed the noise issue – or other potential negative impacts of the project – more seriously; nor considered the reaction of the public after implementation. It’s as if the attitude is to forge ahead and face the consequences later. For a project that has such a large environmental and economic impact, this is behavior is irresponsible, and should be accounted for.

From: robert lantry [mailto:boblantry@yahoo.com]
Sent: Thursday, February 05, 2009 11:28 AM
To: Yoshioka, Wayne
Subject: Just some more same old

What about Linda Lingle and her \$4,000,000,000.00 plans for h-1 and h-2. Has she had her study yet our is this just some more talk?

2/9/2009

AR00057663

From: dan matthews [mailto:dmatthews@consultant.com]
Sent: Friday, February 06, 2009 10:47 AM
To: Yoshioka, Wayne; Ted.Matley@dot.gov
Subject: Draft EIS for the Honolulu High-Capacity Transit Project

Please accept my feelings about the subject EIS.

I disagree with the wording of the EIS because it is written solely for a steel wheel on steel rail system. Other forms of fixed rail should be considered because they may be superior to steel wheels and more cost effective. Please rewrite the EIS to include other forms of mass transit such as monorail or magnetic levitation systems. This should insure the selection of the overall best system.

Thank you for your consideration.

Dan C. Matthews, Lt Col, USAF, Retired
Pearl City, Hawaii

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2/9/2009

From: dlching@aol.com [mailto:dlching@aol.com]
Sent: Friday, February 06, 2009 11:09 AM
To: Yoshioka, Wayne; ted.matley@fta.dot.gov; governor.lingle@hawaii.gov
Subject: Objections to Rail DEIS

Dear Governor Lingle, Mr. Yoshioka and Mr. Matley,

I'm writing to express grave concerns over deficiencies in the DEIS for Honolulu's heavy rail system.

I found the draft EIS statement to be deficient in numerous areas and have specific questions and concerns about the following:

1. How will this project affect current traffic congestion?
2. The comparison of energy use of rail to bus should be done for hybrids, not traditional combustion engine as this report appears to have done.
3. It is unclear how congestion will be remedied during the many years of construction. Lanes of traffic are to be eliminated in certain areas. Where and when this will happen, and what will happen to congestion in those areas?
4. Will there be bike racks on the train and where will they be located? Will bikes be allowed on the train? Will there be a place for surfboards? What about luggage for airport passengers? What about construction workers' tools?
5. The impacts of relocations has not been adequately addressed for important food producers like Aloun Farms, 14 community facilities that will be "partially acquired" as well as small businesses that will not survive a move or reduction in operations. Historic and cultural sites are also not adequately addressed.
6. There is insufficient information on plans to mitigate noise at the 16 schools that are adjacent to the alignment. How will the noise affect the learning environment?
7. The analysis of job creation does not adequately analyze job losses. There is no mention of what will happen to the jobs that are lost due to businesses downturn during construction?
8. The report does not adequately assess the potential harm an elevated rail system does

2/9/2009

to our unique tourist industry and the image of Oahu. How will the tourists see noise and visual impacts of heavy rail? Will the more idyllic neighbor Islands absorb an even larger share of tourism and hurt our County's revenues?

9. The provisions for managing with lower than projected ridership and tax revenue support are inadequate.
10. The plan is also deficient in outlining how corrosion will be mitigated. BART in the SF bay area is made of aluminum. What will happen to steel in a salt air environment? An evaluation of steel vs. aluminum is lacking in this report.
11. Likewise, the DEIS plans for mitigation of graffiti on the concrete support pillars, stations and cars is inadequate. This deficiency will impact the accuracy of predicting the future cost of the project maintenance.
12. Finally, I have concerns that the ADA issues have not been adequately assessed. How long will the doors be open for to access the train? How will an elderly or handicapped person be able to get on and off the train in this time period? Please provide detailed plans on handling handicapped access. How does this effect the efficiency of the train and speed of commute?

Thank you for your thoughtful consideration of my concerns. Please feel free to call me if you have any questions about this letter.

Aloha,

Donna L. Ching
Honolulu, Hawaii
(808) 944-4070

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2/9/2009

AR00057666

From: Pearl Johnson [mailto:pearlj@hawaii.rr.com]
Sent: Friday, February 06, 2009 11:54 AM
To: Yoshioka, Wayne
Subject: Rail DEIS

I think that the Honolulu High Capacity Transit Corridor Project DEIS is quite inadequate. A supplemental DEIS must be produced to address many unanswered questions:

1. Will any stations have restrooms?
2. How can the streets over which rail will run not lose lanes when such large columns will be placed in the middle?
3. What will be done to counteract the darkness resulting from train bed over narrow streets such as Kona and Halekauwila Sts? Has the cost been factored into the maintenance cost?
4. Why does the train start in Kapolei? The stated reason of starting at the maintenance facility is inadequate. Every other new system was started in the city, where the riders are. How did other systems cope with the distance from maintenance?
5. How high will the Ala Moana station be?
6. Why are whole communities of poor people, such as the Banana Patch, being displaced when the DEIS plainly states that they will be unable to find comparable homes with the compensation to be offered? Elsewhere in the document re-alignments are suggested to save historic buildings. But no such measures are considered necessary when it is only poor people that are in the way of the train or a parking lot.
7. The unsightliness of elevated rail's impact on tourism, the city's main industry, is not addressed. Why would anyone want to come here when it will be as ugly and noisy as Brooklyn or Chicago?

The supplemental DEIS should be available at no cost to those who request it, so please do not make it fancy and expensive.

Pearl Johnson
2404 Kanealii Ave.
Honolulu, HI 96813
808-537-5471

2/9/2009



UNIVERSITY
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February 6, 2009
RE: 0784

Wayne Yoshioka
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd floor
Honolulu, HI 96813

Dear Mr. Yoshioka:

Draft Environmental Impact Statement
Honolulu High-Capacity Transit Corridor Project
Honolulu and Ewa, Oahu

City and County of Honolulu, Department of Transportation Services proposes to construct a high-capacity rail system between East Kapolei and Ala Moana Center. The Draft Environmental Impact Statement includes a No Build and 3 Build Alternatives. The Build Alternatives would involve between 19 and 25 miles of elevated guideway and would include transit stations, a maintenance and storage facility, and park-and-ride facilities.

This review was conducted with the assistance of Karl Kim, UHM Urban and Regional Planning; Panos Prevedouros, UHM Civil and Environmental Engineering; Evelyn Cox, UHWO Biology; and Ryan Riddle, Environmental Center.

General Comments

We feel that the DEIS does not adequately capture the full range of costs and benefits associated with the proposed project. It appears to focus too narrowly on transportation elements rather than on the full range of social, environmental, and economic benefits and costs associated with the proposed project. While travel time savings are indeed an important potential aspect of the project, so too are other factors such as mobility, access, energy use, and economic issues. The DEIS also fails to adequately incorporate concepts of sustainability especially as it applies to project design.

In addition to our general comments we also have several specific comments.

2500 Dole Street, Krauss Annex 19 Honolulu, Hawai'i 96822
Telephone: (808) 956-7361 Fax: (808) 956-3980
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Alternatives Considered (pp. S-2 – S-4)

The project calls for an elevated guideway. The benefits of this system compared to an at-grade system have not been sufficiently demonstrated. How much additional performance in terms of reduction in travel time is achieved by elevation compared to signal prioritization and other operating procedures that could be implemented with an at-grade system?

The benefits of being on the ground, up close to activity generators compared to proposed elevated stations in the middle of roadways have not been demonstrated. There is insufficient discussion of the benefits of an exclusive right-of-way and automation over an at-grade system operated by drivers. How do the labor savings associated with a fully automated system compare with the capital and environmental costs of building an elevated concrete structure?

The documents do not sufficiently describe the operating characteristics of the system vis-à-vis other competing technologies in terms of performance, convenience, and trip quality. If instead of building an expensive elevated transit system in which billions are spent on concrete structures, what if a comparable level of spending was on buses, at-grade light rail, and improvements to the energy grid? Given the unreliability of Oahu's electric system and the two recent islandwide blackouts, more attention should go towards design of a more appropriate system given apparent limitations in the present electrical infrastructure.

DEIS Base Travel Times (p. 1-5)

One of our faculty reviewers offered this anecdote questioning the DEIS' given vehicular travel time of 89 minutes from Kapolei to Downtown:

Having resided in Kapolei for a short period in 2007, I know from personal experience that the morning peak period travel time from Kapolei to downtown is always under 75 minutes in the absence of rain or any lane closure. I was startled that the DEIS uses a time of 89 minutes.

In a non scientific survey of people listening in to a radio program some measurements of travel time from the H-1 freeway to Alakea Street in downtown if they depart Kapolei between 6 AM and 7 AM were discussed. The average time of the callers was about 60 minutes. Therefore, roughly speaking the DEIS may be using a 50% overestimate of the travel time which leads to false benefits of travel times by rail.

The DEIS fails to demonstrate the root causes of traffic congestion. The real issue is traffic flow conditions on Nimitz Highway which varies widely as these travel times show: 11, 16 or 18 minutes with good conditions, 25, 30 or 41 minutes with poor conditions. This makes it clear that a roughly two mile long Nimitz Viaduct will provide a consistent travel time from airport-to-Alakea of about 6 minutes, reducing the peak hour trip from Kapolei to downtown

from about 60 minutes to about 40 minutes. A relatively modest investment solves a huge part of the morning commute congestion.

Note that rail will be providing airport-to-Alakea transit travel time of about 50 to 54 minutes depending on the route selected. The airport route provides the longest travel time for this origin-destination pair while the Salt Lake route a little shorter.

Alternatives and Technologies Considered but Rejected (p. 2-7)

The DEIS is inaccurate in claiming that OMPO rejected the Pearl Harbor Tunnel. The UH Congestion Study found that this alternative has substantial traffic benefits at a cost comparable to that of the rail. There has been no substantiation to the tunnel's alleged costs between 7 and 11 billion dollars.

Methodology (pp. 3-2 – 3-3)

The Synchro 6.0 software suite was used for intersection analysis. Synchro applied the HCM Operational Analysis methodology and intersection input data to estimate control delay at each study intersection. This traffic analysis method is not suitable for saturated conditions, and is not suitable for corridor and regional studies. HCM mentions these limitations. Almost all traffic elements along this corridor are oversaturated, thus HCM methodologies do not apply (unless the wrong data are used and degrees of saturation are low). Either way the output is wrong or misleading.

Future Conditions and Effects: No Build Alternative (p. 3-16)

On page 3-16 the DEIS states, "Even with \$3 billion in roadway improvements under the No Build Alternative, traffic delay in 2030 would increase by 44%". If one was to correctly model all the committed congestion relief projects in the Oahu Regional Transportation Plan 2030 and combine them with the fact that Oahu's population has been stagnant or falling (and bound to further fall due to the poor economy and housing prices), the highway congestion in 2030 could improve by at least 15%.

For example, the PM zipper alone will carry about 1,500 vehicles per hour through the Kalauao screenline with three or more people in them thus resulting in a person capacity of 4,500 going west. These are individuals removed from the existing network thus providing substantial traffic relief. The westbound utilization of the rail will be optimistically 6,000 people through the Kalauao screenline of whom at most half will be drivers and ex-carpoolers or 3,000 people. The PM zipper combined with a Nimitz flyover can potentially result in a continuous trip at 55 miles per hour from Iwilei to Waikale to Kapolei. This commute is half as long in duration as that by rail. Therefore the PM zipper lane can potentially be more beneficial. However, the DEIS tries to convince us that major traffic congestion relief projects will not yield much relief whereas the

rail with its inferior speed and 15+ stops to Kapolei will yield superior travel time savings and traffic congestion improvements. Part of the reason is likely that planning models are insensitive to bottlenecks and only provide rough estimates based on some assumed values of capacity. One of our reviewers asserts that a regional microsimulation traffic model assessing the impacts with and without correctly modeled ORTP 2030 projects is needed to assess the benefits of the projects in Table 2-3 of the DEIS.

Transit Ridership (p. 3-26 – 3-34)

The description of patronage estimates for the system is weak. There is insufficient detail to adequately review and validate the estimates for ridership. Given advances in ridership forecasting and spatial analysis of trip origins and destinations, more disaggregate level information should have been provided. While the underlying model seems appropriate for regional highway planning, it seems less appropriate for analyzing a specific transit corridor or for estimating the demand for rail transit in specific neighborhoods or associated with individual stations. In particular, the travel behavior of pedestrians and those making shorter urban trips does not appear to be adequately captured. More attention should be given to public transit users. The forecasting method relies too heavily on out-dated population estimates and doesn't incorporate more recent changes in growth, development, and economic conditions. Additionally, there isn't sufficient distinction by trip purpose, nor adequate modeling of induced trips or behavioral changes associated with the construction of the system.

Specific improvements for the transit-dependent or households without access to private automobiles should be described as well as the station-by-station improvement in services for the elderly or persons with disabilities. The benefits or changes in level of transportation services for low income as well as other environmental justice populations should also be evaluated at the neighborhood or TAZ level. Many of the maps and displays lack sufficient detail in order to evaluate neighborhood or community-level impacts.

The increase in ridership related to transit oriented development should also be addressed. Efforts to validate the ridership forecasts should be described as well as an assessment of not just data quality, accuracy, and reliability but also assumptions regarding growth and development in the corridor served by the proposed transit system. The robustness of patronage estimates given changes in fuel prices, economic growth, employment, and other trip-making activities are not adequately demonstrated.

A related area of concern is the impacts of the system on bus ridership and service to communities in outlying areas. The extent to which the bus system will support and feed riders to the rail system should be described as well as the changes in service for all transit patrons. To what extent will there be duplicate bus and rail service?

Effects on Parking, Bicycle and Pedestrian Facilities, and Freight (pp. 3-41 – 3-44)

The analysis of transportation impacts fails to adequately cover the relationship between increased and improved rail services and changes in the level and distribution of bicycle, pedestrian and other trips. While some mention was made of improvements to pedestrian facilities, the effects of these investments on pedestrian tripmaking behavior aren't described. A more complete discussion of non-motorized travel demand and its relationship to improved transit services should have been included.

Environmental Analysis, Consequences and Mitigation (p. 4-1 – 4-175)

The benefits of the proposed system in terms of reduced air pollution, greenhouse gas emissions and dependency on fossil fuels have not been adequately described. The estimates of transportation impacts should have been related to both local greenhouse gas inventories and carbon budgets. The transit system has the potential of significantly affecting not just emissions but also patterns of local development that in turn shape land use, development, and travel behavior.

The environmental benefits of taking cars off the road have not been sufficiently quantified. It's not just the reduction in traffic, but also other costs (parking, repair and maintenance, safety, etc.) that should be quantified. The reduction in non-point source pollution associated with automobile use as well as the decreased disposal costs associated with motor vehicles might also have been described.

Environmental impacts associated with the proposed project were also inadequately described – namely the impacts associated with the production of concrete and the construction of an elevated system. A life-cycle approach to estimating environmental impacts over time for the various components of the system as well as alternatives should have been provided.

In regards to energy expenditure, a more thorough discussion of energy usage should be provided. Estimates of the per vehicle, per trip energy requirements of the proposed system compared to alternative travel modes (bus, private auto, etc.) should have been provided.

The DEIS should also discuss the potential public health benefits associated with public transit such as increased access to health facilities and a reduction in motor vehicle accidents.

Land Use (pp. 4-10 – 4-18)

Changes in the density of development associated with the proposed project should be discussed in the DEIS as well as the potential for reducing suburban sprawl and the preservation of green space, farmland, and areas for carbon sequestration.

Economic Activity (pp. 4-23 – 4-22)

The economic value of the project in terms of stimulus to the economy is not sufficiently described. What share of the total project costs can be provided with local factors of production versus imported labor, capital, materials and supplies? Are there adequate construction support facilities for a project of this magnitude? Where will the concrete come from? What will be the effect of this project on other planned capital projects in both the public and private sector? How does this project relate to other planned transportation projects on Oahu such as improvements to Nimitz Highway and other large-scale construction projects? While there is currently an economic slowdown, what will be the economic conditions at the time of construction and during the duration of the project? Better economic data for the planning, construction and operating phases of the project should be provided.

More current information regarding key indicators of economic performance for Honolulu should be provided as well as the effects of a large construction project on the local economy. Which economic sectors are likely to be affected? To what extent will proceeds from the project generate local versus off-island returns? How much will local businesses benefit from the project? How much new labor will need to be imported into the state? What is the local and regional impact of the project in terms of income, job creation, wages, inflation, and economic welfare for residents?

Energy and Electric and Magnetic Fields (pp. 4-107 – 4-109)

The adequacy of the electricity system to support this project should be more fully demonstrated in terms of generation, transmission, and distribution issues. Development of a “smart grid” as well as opportunities for renewable energy (solar, wind, etc.) that make use of stations, guideway structures and other elements of the system should also have been included.

Maintenance and Storage Facility (pp. 4-151 – 4-152)

The rail yard is located several miles inland with no direct access to the harbors. 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 construction?

Cash Flow Analysis (pp. 6-7 – 6-11)

The proposal appears to be based on overly optimistic forecasts of economic growth and general excise and use tax (GET) receipts. Efforts to capture federal economic stimulus funding should be included. More details on factors influencing the availability and likelihood of federal aid should be provided. Changes in the tax base due to increased investment and construction of capital facilities such as stations and other improvements should also be described. The impact of

increased access to improved transportation services on commercial and residential property values and the resulting increases in tax revenues should also be included. The potential for tax increment financing, improvement or benefit districts or other strategies for value capture should also be described. More discussion of fare policy should also be included in the DEIS. The cross-elasticity of transit fares as a function of changes in other transportation costs (bus, private automobile, etc.) should also be provided. A more coherent description of farebox revenues in the short-term as well as over the life of the project alongside articulation of transit fare policies should be provided.

The project's cash flow analysis 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 should not begin until the full extent of federal funding is known in writing as part of the next Transportation Act of Congress. Additionally, 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.

Rail Travel Time Discrepancies

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 a large eight-page brochure the centerfold of which states that Kapolei to Ala Moana Center by rail will be 40 minutes. Why the discrepancy in figures?

Rail Extension

A Supplemental DEIS is needed to address the route beyond Ala Moana Center as the public's understanding of the project is of a rail system from Kapolei to UH with service to Waikiki. A Supplemental DEIS is required to assess the impacts for the whole corridor.

Two related observations from the supplementary report "Transportation Technical Report, Honolulu High-Capacity Transit Corridor are as follows:

Figure 3-29 shows that rail line overflies the freeway near the University of Hawaii. This is a scenario that the city vigorously disclaimed in the September to November 2008 time frame but then it presents it in official documents.

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? One reviewer 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.

TOD Potential

What is the impact of station generated traffic, noise and pollution to Transportation Oriented Development (TOD) potential and TOD plans? Where is the discussion and assessment?

Peak Hour Screenline Level-Of-Service Methodology

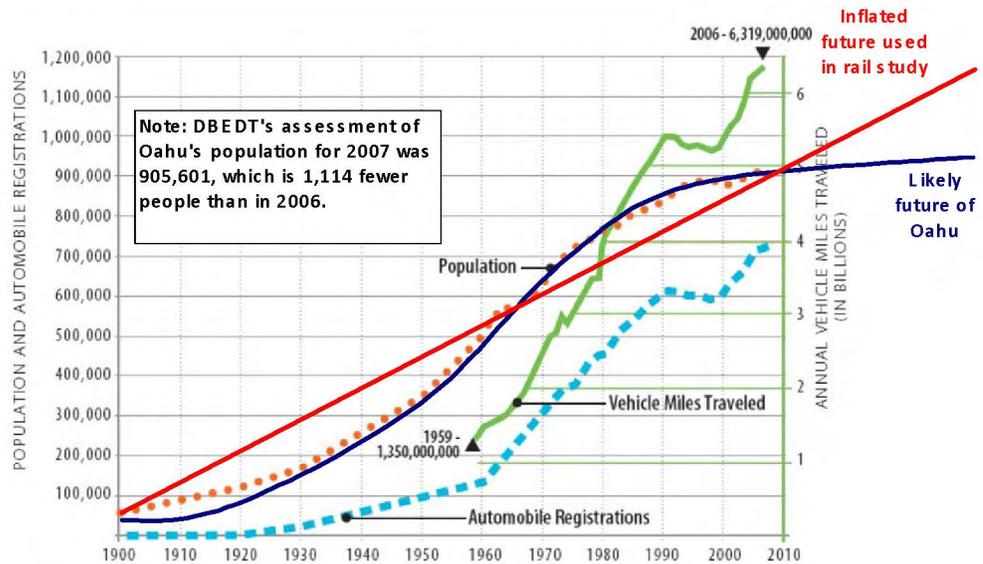
In the Transportation Technical Report the peak hour screenline level-of-service methodology is described. The DEIS states, "To measure and describe the local roadway network's operational status, an LOS grading system was developed to describe a facility's operation, ranging from LOS A (free-flow traffic conditions with little or no delay) to LOS F (over-saturated conditions where traffic flows exceed design capacity, resulting in long queues and delays). The operation of the roadway segments was calculated by comparing traffic volumes on roadway facilities to the saturated volume LOS thresholds for each individual facility. The LOS is reported for each individual screenline facility, then weighted by traffic volumes to report overall operating conditions across each screenline."

This is an ad hoc method that is not a national standard. It is not appropriate to use the Highway Capacity Manual's LOS measure without using the HCM methodology. The HCM LOS for freeway screenlines is based on density and speed not on volume-to-capacity ratio. Furthermore, the volume to capacity "method" in the DEIS was wrongly applied in the Alternatives Analysis. The table below shows that general purpose traffic was estimated to be 31% above capacity (estimate of 1.31) but by their numbers, the correct estimate is 62.5% over capacity (estimate of 1.625.) Capacities are not revealed everywhere in the DEIS, so the reviewer cannot check the same calculations in the DEIS.

AA Table 3-12		2030 Rail				Correct volume/capacity estimates
Kaluaao Stream Koko Head bound		20-mile Alignment Kapolei to Ala Moana Center				
	Revised Facility Capacity	Forecast Volume (vph)	Volume/Capacity Ratio-AA	LOS		
H-1 Fwy	9,500	17,209	1.811	F		
H-1 Fwy (HOV)1	1,900	2,740	1.442	F		
H-1 Fwy (Zipper) 1	1,900	2,241	1.179	F		
Moanalua Rd	1,700	853	0.502	A		
Kamehameha Hwy Managed Lane	3,450	3,059	0.887	D		
Total General Purpose Traffic	14,650	21,121	1.310	F	1.625	24%
Total HOV Traffic	3,800	4,981	1.310	F	1.324	1%
		26102				

DEIS (from Technical Report Appendix C Table C-3)		2030 with First Project Salt Lake Option				Correct volume/capacity estimates
Kaluaao Stream Koko Head bound		2030 Facility Capacity DEIS	Forecast Volume (vph)	Volume/Capacity Ratio-2	LOS	
H-1 Fwy	9,500	12,170	1.281	F		
H-1 Fwy (HOV)1	1,900	1,640	0.863	E		
H-1 Fwy (Zipper) 1	1,900	1,460	0.768	D		
Moanalua Rd	1,700	1,290	0.759	D		
Kamehameha Hwy Managed Lanes	3,450	2,350	0.681	E		
Total General Purpose Traffic	14,650	15,810	1.08		1.149	
Total HOV Traffic	3,800	3,100	0.82		0.819	
		18910				

errors



Source: City and County of Honolulu Department of Business, Economic Development and Tourism, 2007.

Figure 3-1: Historic Trends in Population, Vehicle Ownership, and Vehicle Miles Traveled for O'ahu

February 6, 2009
Page 10

Thank you for the opportunity to review this Draft EIS.

Sincerely,

Peter Rappa
Environmental Review Coordinator

cc: OEQC
Karl Kim
Panos Prevedouros
Evelyn Cox
Ryan Mielke, UHWO
James Moncur, WRRC
Ryan Riddle

MICHELLE SPALDING MATSON

3931 Gail Street
Honolulu, Hawaii 96815

February 3, 2009

Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Attention: Wayne Y. Yoshioka, Director

Subject: Honolulu High-Capacity Transit Corridor Project
Draft Environmental Impact Statement

Dear Sir:

The following comments center on the significance of the Honolulu Waterfront as a historic complex, which is greatly understated and poorly depicted in the subject Draft EIS. The callous insensitivity and abandonment of sound planning and preservation practices demonstrated by the promoters of the proposed project destined to blight this historic complex, across which the subject elevated industrial infrastructure is proposed to span, is appalling.

The Honolulu Waterfront is representative of Honolulu's history from the days of Kamehameha's strategic harbor village, to a Pacific port that welcomed visitors by clipper ship and exported sugar cane across the seas, to today's destination for cruise ships and container cargo essential to the State's sustainability. The permanent visual damage to the appearance and experience of this historic area caused by the proposed industrial infrastructure will be irreparable.

Aloha Tower has long been a beacon that has welcomed travelers to Honolulu. Irwin Memorial Park was Honolulu's first beautification project as the landscaped companion to Aloha Tower, and both landmarks are listed on the Hawaii Register of Historic Places. Together they were, and remain, the landscaped gateway to Honolulu for thousands of residents and visitors alike.

As a family descendent of those who deeded Irwin Memorial Park in trust to the Territory of Hawaii, and writer of the nomination of this site for the Historic Register, I have a vested interest in the protection and preservation of this historic open space held in the public trust. Irwin Memorial Park was indeed a landscaped centerpiece park as intended by the donors until the federal government converted a portion of it into a World War II military parking lot. Since that time plans have been commissioned for the Park's restoration, which has been part of ongoing planning discussions with the State's Aloha Tower Development Corporation.



**HONOLULU WATERFRONT'S FOUR REGISTERED HISTORIC SITES:
ALOHA TOWER AND RESTORED IRWIN PARK WITH THE HARBOR AND PASSENGER TERMINAL BEYOND
AS VIEWED FROM THE DILLINGHAM TRANSPORTATION BUILDING ON BISHOP STREET**

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF VALUED PUBLIC RESOURCES

One of the most significant adverse impacts of the proposed elevated steel-on-steel heavy rail system is the irreparable blight it will implant through the vital heart of the Downtown Honolulu Waterfront and beyond. This obtrusive blight will impact five protected registered historic sites along the proposed Waterfront route – specifically the Piers 10 and 11 Maritime Passenger Terminal, Aloha Tower, Irwin Park, the Dillingham Transportation Building, and Mother Waldron Park beyond.

Because of the City's requirement for federal funding for the proposed elevated rail project, there must be compliance with Section 106 of the National Historic Preservation Act and Section 4(f) of the Department of Transportation Act. It will therefore be taken into account that such elevated infrastructure slicing across the historic waterfront will substantially visually impair and block the views of these historic resources, i.e., the scale of the infrastructure would overwhelm the appearance of the adjacent historic resources and would cause the loss of integrity of setting, feeling and association of these historic sites and their scenic quality, scale and prominence within the visual environment of this significant location. The historic public view corridors to Honolulu Harbor from Bishop Street, Fort Street, and the Chinatown historic district will be similarly substantially impaired.

The Draft EIS clearly inaccurately accounts for these significant cumulative adverse effects and fails to adequately evaluate the effects of the proposed project on the view corridor. According to the Code of Federal Regulations, 36 CFR Part 800, significant effect is defined as “alteration of the characteristics of a historic property qualifying it for inclusion or eligibility for the National Register,” and adverse effect is constituted as, among other things, “introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic feature.”

The Draft EIS states on page 2-37 that Irwin Memorial Park “does not derive a substantial part of its value from its visual setting” and “the project would not substantially impair aesthetic features that are important contributing elements of the property.” The Draft EIS overlooks the visual significance of Irwin Memorial Park’s landscaped open space together with three other registered historic structures within the uninterrupted view plane. Visually sensitive resources include landmarks, significant views and vistas, view corridors, and historic sites. Because of the proximity and placement of these historic sites it is the views within this historic complex associated with the sites, i.e., to, from and around them, that are significant. A flat roadbed does not adversely impact view planes, corridors or sight lines as they relate to the historic site, but massive rail infrastructure built to thirty (30) feet in height with “visual, atmospheric, and audible elements” would have adverse effects “that diminish the integrity of the property’s significant historic feature,” and would thus appear to qualify the historic site for protection under Section 4(f).

The visual effects of the proposed project are listed on Table 4-10, and the visual quality of Irwin Park and Aloha Tower is acknowledged to be high. However, the Draft EIS curiously claims that the adverse visual effect of the proposed project on the visual integrity of Irwin Park and Aloha Tower will be “moderate” and “low” when in reality the overall visual effects in this area would be significantly high. Further, the Draft EIS provides a degree of self-contradiction by acknowledging on page 4-88 that “the guideway and columns would change the visual character of the streetscape and substantially affect the visual setting of the Dillingham Transportation Building and Irwin Park. Overall visual effects in this area would be high.” Moreover, the Draft EIS flies in the face of moral logic and public policy by blindly declaring on page 4-44 that “The transit system would have little effect on the integrity of the historic districts or their uses,” and thus falls flat in assessing the affected visual environment’s character and quality.

Further, in both text and depiction the Draft DEIS ignores the high visual quality of this historic complex as approached ewa-bound from the Diamond Head direction, makai from Bishop Street and the historic Dillingham Transportation Building, and makai from Fort

Street and historic Walker Park to Aloha Tower. These more prominent view planes are superior to the alternate perspectives apparently arbitrarily chosen for the Draft EIS, and if superimposed with the elevated rail infrastructure these views would demonstrate the true significant adverse visual effects of the proposed elevated rail infrastructure proposed to span the Honolulu Waterfront from Chinatown to the Federal Building.

The proposed project's cumulative adverse visual and aesthetic impacts to the Honolulu Waterfront and its historic sites would conflict with established policy documents, specifically the Oahu General Plan (Objective B, Policies 2 and 3; Objective E, Policies 4,5 and 9), the Primary Urban Center Development Plan (Objective 3.1.2 and Policy 3.1.2) and the Revised Ordinances of Honolulu (Chapter 21, Article 9, Section 21-9.60), as follows:

- Substantially visually changing and contextually impacting the entire Downtown Honolulu Waterfront area, which is both a historic and scenic asset.
- Positioning elevated infrastructure adjacent to and/or in the foreground of existing historic sites and views
- Altering existing makai views and mauka view corridors
- Introducing dominant features in the views, i.e., elevated infrastructure and expansive station elements
- Substantially contrasting with the pedestrian scale and character of the streetscape
- Substantially affecting the aesthetic setting of the historic sites

Thus the elevated infrastructure and stations will irretrievably alter the significant views and sense of historic place of the Honolulu Waterfront. The visual impact of overpowering industrial infrastructure will ruin the waterfront experience for residents and visitors alike for generations to come, including motorists traveling along the waterfront and pedestrians crossing the roadway under the overshadowing monolithic infrastructure. Many major viewer groups who now enjoy the attractive surroundings and experience of the Downtown Honolulu Waterfront will be sensitive to the visual change and will be adversely affected by the altered views and substantial changes in light and shadows around the massive elevated infrastructure.

It would therefore be a fatal mistake for Honolulu's future if the City forces intrusion of elevated transit blight on the Honolulu Waterfront and its historic mauka-makai harbor views. As a consequence, the vital visual historic character and integrity of the waterfront centerpiece of Downtown Honolulu and its Harbor will be lost. One only needs to consider the blight of the Embarcadero Freeway along the San Francisco Waterfront, and the universal public elation when it was torn down. It is time that the City and County of Honolulu learns by the mistakes of others and does not continue to blunder forward.

Because of the high adverse impact to the visual quality of the Honolulu Waterfront, blocking views and clashing with historic buildings and open space in terms of size, scale and character, the Downtown Waterfront transit corridor route must be rerouted via available alternatives. The Draft EIS provides several Avoidance Alternative Alignments to minimize harm and ensure protection of valued features and sites along the transit route, and the Honolulu Waterfront is more than worthy of this consideration, action and protection. In addition, on January 28, 2009, the Honolulu City Council, as the elected policy-making body for the City and County of Honolulu, approved rerouting a major segment of the proposed rail corridor. If this cannot or will not be done for the Downtown segment, and because it will be impossible to mitigate the unyielding mass of the industrial elevated design framework to preserve significant visual resources, the proposed elevated rail system should be terminated in Iwilei with connection to a dedicated, flexible and convenient grade level Downtown circulator system serving the entire area.

The Draft EIS claims on page 4-44 that as the elevated rail alignment transitions from the Honolulu Waterfront to Halekauwila Street, a narrow local tree-lined road dating from the 1800's, there are "highrise buildings with little or no space between them" and "tall trees already obstruct views." In fact, the public buildings at this Civic Center end of Halekauwila Street, while not much taller than the train would be, are surrounded by mature healthy shade tree canopies and wide setbacks, which are in themselves are welcome comforts within the public visual experience of this district. Again, the visual integrity of this area would be hideously overshadowed, bisected and deformed by the massive industrial elevated rail infrastructure. Indeed, the Draft EIS states on page 4-88 that the "overall visual effects in this area would be high."

The Draft EIS also proposes to carve the elevated heavy rail route through Kaka'ako immediately adjacent to the next historic site, Mother Waldron Park on Halekauwila Street, diminishing its historic character and integrity, and usefulness and attraction as a vital recreational open space for today's growing population. The Draft EIS states on page 4-89 that the proposed project "would substantially change views and contrast with the scale and character of the surrounding environment. Overall visual effects would be high.... Views of the horizon would be partially blocked... including mauka views from the park at Halekauwila Street and Cooke Street. The bulk and scale of the guideway and columns would conflict with the pedestrian-oriented streetscape."

Further, the revised Kaka'ako Mauka master plan designated Halekauwila Street and its extension to Kamake'e Street as a significant "promenade street," a pedestrian-friendly boulevard with wide tree-lined sidewalks and new low-rise residential neighborhoods. Thus

the proposed elevated steel-on-steel heavy rail transit infrastructure blight bisecting these planned Kaka'ako neighborhoods is also tragically misplaced.

There has been little, if any, consideration of the local context in this train proposal for Downtown Honolulu, or from Kaka'ako to the gateway of Manoa's green valley, as it has been railroaded through an uninformed planning process. Hundreds of mature trees that have been protected and preserved for decades are destined to be destroyed or otherwise removed in direct conflict with the Oahu General Plan (Objective A, Policy 9) and the Revised Ordinances of Honolulu (Chapter 41, Article 13). The Draft EIS discloses on page 4-89 that "Mature trees would be removed from Pi'ikoi Street through the Ala Moana Center Station area, substantially changing the character of the streetscape."

The condition and appearance of Honolulu's streets and public open spaces are important factors in, and essential attributes to, the visual character and quality for which Honolulu is known. Significant views and vistas in policy documents include protected mauka and makai views as well as views of prominent landmarks, and the environmental visual character and quality must be fully assessed along with any potential physical impacts.

In conclusion, it has become abundantly clear that the presently proposed elevated transit project is, in some significant aspects, contrary to the public interest. Very serious public concerns surround the City's disregard and neglect of the significant adverse impacts of the proposed elevated rail infrastructure. Specific to the complex of registered sites that include the Piers 10 and 11 Maritime Passenger Terminal, Aloha Tower, Irwin Park and the Dillingham Transportation Building, along with Mother Waldron Park, this badly-planned project cannot, and must not, be allowed to proceed further to overshadow and overpower these significant historic sites and destroy the visual character and integrity of the Downtown Honolulu Waterfront.

Sincerely,

Michelle S. Matson

Michelle Spalding Matson

From: Cinnie Frith [mailto:cfrith@fbsmgt.com]
Sent: Friday, February 06, 2009 5:48 PM
To: Yoshioka, Wayne
Subject: Honolulu Transit Project DEIS

I would like to comment on a few of my many concerns about this project that are not covered to my satisfaction in the DEIS. My two main concerns have always centered around cost as it pertains to projected usage and available jobs for Hawaiian workers.

As to costs, touched upon in Chapter 1, what if we go "over budget" or we don't receive the federal money as expected? What if the increased GET tax is not enough to pay for the citizen's portion of the project? What if ridership does not materialize as anticipated? What if all of your mitigation efforts, which are very poorly explained throughout the report, do not work well enough to "mitigate"?

2/9/2009

In Chapter 2 of the report on page 5 you state-"The managed lane alternative would not have supported the planned concentrated future population and employment growth because it would not provide concentrations of transit service that would serve as a nucleus for TOD". This statement reminds me of the tail wagging the dog, in that I was under the distinct impression that this project was to relieve traffic congestion, and not the other way around! What is the source used for stating that there are "no funding sources" for this alternative?

On page 13 of Chapter 2, you talk about "committed congestion- a relief project in the Oahu Regional Transportation Plan 2030. Can you expand on the meaning of this project? Did I also read correctly that there was need for a traction power substation EVERY MILE? On page 38 they talk about the provision for vehicular propulsion and auxiliary power to be housed in a steel "box" with dimensions of 40'long by 16'wide by 12'wide! Were will they be located and how will they be protected as they will contain transformers, rectifiers, batteries and ventilation-all connected to an existing electrical grid?

On page 39 of Chapter 2, you do address use of the "local" work force, stating that one of the reasons for the phase approach to the entire project is to "match the rate of construction to what can be maintained with the local workforce and resources". Can you elaborate on the skill level needed for much of this project and if the work force has the capacity to take on such a huge and daunting task? Again, I sense the tail is wagging the dog!

On to Chapter 3 page 2-What is an on board transit survey? It appears that one was completed and became part of the OMPO travel demand forecasting model which was used to "predict" future traffic conditions and Transit ridership. Then on page 26 it is stated that "under any build alternative average travel time on transit would improve dramatically, enhancing overall mobility and accessibility". Is this statement inclusive of all time getting from point A(initial departure) to point B(final destination)? Then you go on to say,"In some cases, transit travel times would be 1/2 of today's time". Could you give a specific example?

Page 28-table 3-5 really has me confused! Station to station travel times with down time are clearly stated in columns, but two of the columns are missing 7 stats/times and the other two are missing 5stats/times. How can you come up with a realistic total when you're missing so much information? I must also state that I have never believed for one moment that the down time at each station was realistic to what is needed for people to get on and off any form of public transportation SAFELY.

Chapter 3 page 37 states that there will be no reduction of the number of roadway lanes upon completion of the project (table 3-21), but as I continued through this section to page 43 I was alarmed to realize that some areas would loose their 4' bike lanes and have to co-mingle. with traffic on a shared lane that was now downsized to 14' wide. Other areas would see more narrow sidewalks with pedestrians having less space. It would appear we're robbing Peter(The people) to pay Paul(The train), and it feels like a very slippery slope for public safety.

Finally-pages 48-50 talk about a Traffic Plan on how you minimize construction effects, but is there a plan in place? The same question is asked about a Transit Mitigation Plan-is there one in place?

My concerns do continue, especially where the esthetics of this project are concerned. In your initial summary on page 6 you talk about this project as "trying to enhance the visual and esthetic opportunities that it creates". Looking beyond the horrendous cost and all the political wheeling and dealing, I hate to see this beautiful island blighted with this "steel elephant" and our grandchildren choked with a financial burden they do not deserve nor can ill afford.

Cynthia Frith

2/9/2009

From: Dale Evans [mailto:dale@charleystaxi.com]
Sent: Friday, February 06, 2009 6:30 PM
To: ted.matley@fta.dot.gov; Yoshioka, Wayne
Subject: Charley's Taxi re DEIS

February 6, 2009

Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 11650
San Francisco, CA 94105
415-744-3133

Mr. Wayne Y. Yoshioka
Department of Transportation Services
City & County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813
808-768-8303

Comments of Charley's Taxi re
Draft Environmental Impact Statement/Section 4f) Evaluation
Honolulu High Capacity Transit Corridor Project
City and County of Honolulu, Oahu, Hawaii

Traffic Congestion Depresses Consumer Activity, Business Operations and the Economy

Traffic congestion directly and daily adversely impacts taxicab passengers, operators and drivers. Government policies have purposely induced traffic congestion to unacceptable levels. To spite 'automobility,' politicians punish innocent consumers and businesses who have become 'prisoners of congestion.' Traffic congestion does not simply affect the government subsidized transit buses, every transportation operator and business will experience higher costs and difficulties to fill customer demand and expectations, many of whom will become unable to ride TheBus or TheTrain.

We are deeply concerned about the impacts of the rail system to make congestion worse on the roads along and surrounding the rail route. Honolulu having the one of the fewest urban road miles in the US and territories, and with many narrow roads throughout the route, no promises of mitigation are sufficient to compensate for the permanent damage to traffic conditions. Private transportation providers' services to our customers will become more costly and difficult to fill.

2/9/2009

Traffic congestion reduces productivity and raises fuel and labor costs for transportation providers. Travel delays increase fares to our passengers. Traffic congestion lengthen trip times that also become unreliable to show up for appointments on time. Since the city removed the 4th lane on the Ala Wai Boulevard in 2004, our taxi drivers experience travel delays to the tune of 4 to 6 lost trips a day. The loss of trips has caused taxi drivers to work longer hours and the 7th day in order to make up for the loss of trips due to traffic congestion.

With about 1400 licensed taxicabs in Honolulu, the number of trips lost per day approximates 7000 trips on any day of lost productivity. Having 1.6 passengers average per taxi trip, 11,200 potential taxi passengers are sacrificed a day in Honolulu. A recent congestion study (for cordon pricing experiment that was contemplated) in Manhattan showed similar loss of 5 taxi trips a day due to congestion.

Before this latest tourism downturn, congestion regularly limited supply as drivers were stuck in traffic. Our passengers therefore endured longer waits and travel times and higher fares. The frequency of 2-3 parades a week in Waikiki was a nightmare as fares doubled and tripled for a 2 mile trip in Waikiki, discouraging frustrated drivers from going into bad traffic.

Restaurant reservations schedules are thrown off due to traffic congestion, with a domino affect on later seatings. Theater schedules, parties and charity fund-raising events are similarly thrown off and delayed due to traffic congestion. Traffic congestion affects the economic engines that drive Hawaii's economy: Tourism, Military and Construction.

Since 1990, only 2.23 freeway miles have been added on Oahu even though tens of thousands of homes were added to West Oahu, the corridor for which the rail is planned. As if to buttress rail proposals, little has been done over decades to relieve the bottlenecks on H1/H2 merge and the Middle Street merge. Motorists gained 10-15 minutes in travel time just by widening one lane the length of 1.5 miles for the Waimalu off-ramp.

Excessive Dependence on Government Subsidies

Rail systems are more costly than bus systems because a rail system cannot operate with feeder buses, thus requiring two systems: TheTrains plus TheBuses. Heavier reliance on government subsidies for rail poses the same fiscal quagmire as rail systems elsewhere that threaten the economic stability of municipalities, states and nations today.

The federal contribution to the excessively high cost of rail pales in comparison to the local cost burden.

The proposed rail system's costs, risks, and liabilities are so excessive to be unsustainable without even greater tax increases on Honolulu's small and declining population of 900,000. Compared to other metropolitan areas, Oahu residents and businesses suffer a higher cost of living, highest costs of doing business, highest taxes, severely high cost of housing, highest electricity costs.

Threat to Economic Stability

The city has no process to assure independent oversight, accountability, performance and transparency over this proposed project. Hence, the prospects of mismanagement and the cost over-runs and delays can be expected to be much higher and longer than any other rail system built in the USA.

Honolulu has the dubious distinction of having one of the highest construction costs in the nation, where everything has to be shipped in, and therefore takes longer and farther to travel.

The city has no experience to manage a megaproject of the proposed size of TheTrain and its Transit-Oriented Developments.

The city is totally reliant on consultants to manage the proposed rail projects and the consultant in charge has a rather tarnished history not only in Boston but elsewhere.

The mayor may not complete his term beyond 2010 and there is no stronger political leader to champion this project in his stead.

The city and its rail advocates have failed to inform the public in the many millions spent on meetings, hearings, literature and advertisements, that the price of Honolulu's rail system — for its size and scope — is many, many times higher than other systems touted to promote the successes of rail systems.

Honolulu has a long history of delays in construction projects coming in on time, on budget. In recent times, construction projects have been stopped due to "iwi" discoveries, and the rail project traversing through downtown Honolulu promises to encounter many more iwi discoveries, for sure.

The current financial crisis has eliminated or lessened many of the prospective developers to participate in the Transit-Oriented Developments surrounding the proposed rail stations.

Prioritizing Commuters over Seniors with Multiple Disabilities

2/9/2009

Chapter 1, Background, Purpose and need (DEIS pp 1-1 to 1-21)

The burgeoning transportation needs for seniors and disabled passengers are totally absent from this discussion. When why does the city focus exorbitant assets and resources (\$4 Billion-plus) for a commuter market that is a pittance in comparison to the needs of the senior population over 60 years in age, to grow to 284,350 by 2030?

Between 2000 and 2030, Oahu's population over 60 years of age is projected to increase by 134,157 or 189 percent (from 150,193 to 284,350), to become 25.4 percent, (from 17 percent in 2000) of Oahu's projected total 1,117,300 population in 2030.

[Link to DBEDT: series2030report-appx-3.xls](#)

A projected 1.3 percent increase in transit ridership is a pittance compared to the underserved needs of the seniors who suffer multiple disabilities and will therefore be unable to ride TheBus or TheTrain. There is no discussion of the impact that the rail system during construction and in operation will have upon the travel times of those seniors and disabled who will be unable to use TheTrain and who also find that HandiVan is inconvenient and unavailable to provide independence and reliability that is afforded to physically fit riders. This DEIS represents discrimination in the worst sense in that the aged population having multiple physical disabilities and economic hardships will suffer fewest transportation options, despite their most severe vulnerabilities.

Continuing History of Rationing Transit Bus Services

The proposed transit system's ridership will be limited by the number of buses and trains projected. Adding a train with feeder buses will reduce service access so as to further ration transit availability overall.

Ch1, 1.1 History and Conditions Leading to the Project

"The HRT&L streetcars were completely replaced by buses in 1942." DEIS, p. 1-1

Good timing, because ridership surged with less than 200 buses to 53,325,862 in 1942, 76,805,829 in 1943, 93,016,633 in 1944, and 85,245,013 in 1945 with 200 buses. In all the years since, ridership has never exceeded the 1943, 1944, 1945 numbers.

The city has failed to present FTA and the public with a true picture of TheBus performance and to compare it against the non-subsidized private operators' yields prior to the city & County of Honolulu's takeover of HRT in 1971. Ridership volume has declined and the yield per bus has likewise declined, despite the increase in population.

Statistics on TheBus performance indicates one or some of the following:

- 1 – that the city has rationed the number of buses in its fleet to stifle growth potential
- 2 – that demand for transit does not warrant additional capacity.
- 3 – to grow traffic congestion by withholding commuter bus capacity in order to justify a rail system.
- 4 – the moratorium on highway construction in order to call for the need of a rail system.

Since the City & County of Honolulu took over the transit system from HRT in 1971, the highest TheBus ridership in the 1980s — of 76,260,187 in 1984 with a 440 bus fleet — has never been duplicated in the 23 years to 2007, even though Population increased by 107,801:

1984	440 TheBus fleet	76,260,187 riders	173,319 avg riders per bus	797,800 population
2007	531 TheBus fleet	71,749,376 riders	135,121 avg riders per bus	905,601 population

From 1989 to 2006, the number of buses in TheBus fleet increased by 50 buses only, with 6 more TheBuses added in 2007:

1989 to 1992, TheBus fleet was 475 (period of the 1992 rail debate)
1995 to 2006, TheBus fleet was frozen at 525 for 11 years

Since 1973, the city has rationed commuter express bus services. Bus trips were not added commensurate with the increase of population and households in the Ewa/Waianae region.

TheBus trips have been concentrated on tourist ridership instead (Routes 8, 19, 20 and 22: Waikiki - Ala Moana Center, Waikiki – Airport & Pearl Harbor, Waikiki - Hanauma Bay.

See Excel Worksheet: Transit Buses/Ridership

Figure 1-2 (DEIS p 1-02) fails to include relevant statistics, such as:

- Ridership volume of TheBus declined since 1984
- Stagnation of fleet size in relation to population growth, bus trips in growth areas
-

Compare ridership yield per bus:

1955	29,658,374 riders, avg 241,125 riders x123 buses
1956	19,900,409 riders, avg 243,093 riders x 123 buses
2006	70,384,355 riders, avg 134,065 riders x 525 buses
2007	71,749,376 riders, avg 135,121 riders x 531 buses

2/9/2009

Figure 1-5 Population Distribution for Oahu (DEIS p1-8) fails to show the number of bus trips, schedules and routes assigned to population areas that would show the lack of or attempt to fill capacity to meet demand of new growth areas.

Figure 1-6 Employment Distribution for Oahu (DEIS p1-9) also fails to show the number of bus trips and routes assigned to growth areas.

Ch1.5 (DEIS p 1-15) Why has the city failed to present TheBus' performance results to justify the need for expanded transit services for the Leeward Corridor? Why are taxpayers expected to foot the exorbitant investment and O&M costs for a rail system whose capacity will likewise be permanently limited by the number of rail cars that are projected for this system?

History of Deferred Maintenance that add to higher costs ultimately

The City & County of Honolulu scoops up regular increases in taxes and fees while its infrastructure and facilities are in dilapidated conditions. Despite promises to "be honest, truthful, and accountable for the public's money," the mayor has failed to present the citizens of Honolulu with specifics and details on the worsened state of our infrastructure and costs to repair, renovate or replace same.

In his February 25, 2005 State of the City Address, Mayor Hannemann laid out in general terms the depth and magnitude of "the challenges" facing the citizens of Honolulu. Three of the many examples cited are found at <http://www.co.honolulu.hi.us/mayor/soc2005.pdf>

"The amount we pay each year in interest and principal stands at 194 million dollars, nearly 20 percent of our budget. Our debt service for 2006 is expected to increase by 40 million dollars over this year – and that's just the increase. We've amassed a total debt of more than 3 billion dollars, about 3 thousand dollars for every man, woman and child in the City & County of Honolulu." (page 3 of 21)

"At the 40-year-old Neal Blaisdell Center, another heavily used facility, the arena is badly in need of a new air-conditioning system. Sections of the parking lot are sinking." (p 6 of 21)

"Staff shortages of 30 percent in many departments are the norm, and have not only affected our ability to properly serve the public, but had a terrible impact on the morale of our City work force, who have been told year after year 'to do more with less.'" (page 7 of 21)

The mayor (p 10) considers "filling potholes" as fixing the roads: *"Our maintenance of roads will follow a plan and a schedule consisting of three parts: The first is that, quite simply, our City road crews will be filling potholes year round and not only in emergency. The second part is called first-aid, meaning a three-quarter to one-inch overlay of asphalt on existing roadways in rural areas... The third is major reconstruction of heavily used thoroughfares."* In fact, the reconstruction plan has been meager and the heavily roads and arteries in downtown continue to be riddled "throw and go" pothole fillers.

Transit trips are projected to be longer than auto trips. Why should taxpayers underwrite high costs of rail for longer transit travel times?

Respectfully submitted,

Dale Evans
President & General Manager

Charley's was founded in 1938 by Charles S. and Helen H. Morita, and is Hawaii's oldest passenger ground transportation company. With nearly 300-plus drivers in a fleet of over 200 taxicabs, vans and limousines, Charley's serves over 2.5 million passenger trips a year on Oahu. Now in its third generation as a kama'aina small business, Charley's provides the very finest premium on-demand transportation service to the public, giving special care and attention for MediCab, Executive Car, Designated Driver for DUI Alternative, Taxi Airport Shuttle and the nation's only Japanese fluent taxi dispatch service. Charley's is the only local taxi company that has been officially recognized as an industry leader with industry and government awards.

For more information, see our website at www.charleystaxi.com

2/9/2009

ISLAND OF OAHU

Population		Freeway	Other	Unpaved	TOTAL MILES
	1938		562.6	87.4	650
500.4	1958		861.99	58.82	920.81
630.5	1971		1172.9	39.34	1212.24
	1974		1193.5	36.26	1229.76
762.6	1985	95.95	1296.6	33.44	1425.99
836.2	1990	86.3	1367.4	33.44	1487.14
	1998	88.58	1405.1	33.44	1527.12
876.2	1999	88.58	1425.54	33.44	1547.56
	2003	88.55	1526.01	7.92	1622.48
	2004	88.55	1528.87	7.92	1625.34
834.0	2005	88.53	1531.78	7.92	1628.23

TOTAL MILES comp to 2005

since 1958	0.88
since 1985	0.16
since 1990	0.11
since 1999	0.07

TOTAL FREEWAY MILES comp to 2005

since 1958	
since 1985	-7.42
since 1990	2.23
since 1999	-0.05

OTHER MILES comp to 2005

since 1958	669.81
since 1985	235.2
since 1990	164.4
since 1999	106.3

NOTE: Miles do not include Unpaved Miles

MILES statistics from State Data Book, DBEDT, early stats from print books

Table 18.02 - Length of Streets & Highways, Paved, Unpaved by Islands

<http://www.hawaii.gov/dbedt/info/economic/databook/db2000/sec18.pdf>

POPULATION statistics:

1990 <http://www.hawaii.gov/dbedt/info/census/Folder.2005-10-13.2927/prc>

2000 <http://www.hawaii.gov/dbedt/info/census/Folder.2005-10-13.2927/prc>

in thousands

POPULATION percent increase compared to 2005

since 1958	333.6	0.6667
since 1985	71.4	0.0936
since 1990	-2.2	-0.003
since 1999	-42.2	-0.048

VISITOR			Transit			REGISTERED		
Arrivals	YEAR	POPULATION	Buses	Ridership	Avg riders/B	Motor Ve	Pass Veh	Buses
	1900	58,504						
	1910	81,993		8,979,874				
	1915			11,822,269				
	1920	123,496		16,926,617				
	1925			17,436,122				
	1930	202,889		14,505,045				
	1935			12,712,052				
	1938		71	18,460,134	260,002			
	1939		81	19,224,906	237,345			
	1940	257,696	100	23,390,745	233,907			
	1941			28,814,029				
	1942			53,325,862				
	1943			76,805,829				
	1944			93,016,633				
	1945		200	85,245,013	426,225			
46,593	1950	353,020						
109,798	1955		123	29,658,374	241,125			116873
133,815	1956		123	29,900,409	243,093			122583
168,829	1957		198	29,786,647	150,438			130098
171,588	1958		198	29,350,543	148,235			134902
243,216	1959		198	29,336,610	148,165			144546
296,517	1960	500,409	198	29,083,700	146,887			158513
319,807	1961		193	26,116,687	135,320			169738
362,145	1962		186	24,530,398	131,884			180077
429,140	1963		198	22,922,296	115,769			190328
508,870	1964		202	22,945,470	113,591			204781
606,010	1965		176	23,190,704	131,765			220720
710,580	1966		146	23,694,206	162,289			230550
1,001,810	1967		146	18,301,341	125,352			238462
	1968		143	23,514,205	164,435			
	1969		141	24,079,233	170,775			
	1970	632,624	141	30,434,906	215,850			
	1971	645,259	108	19,413,259	179,752	332212	299320	
	1972	660,125	143	31,031,764	217,005	341973	308675	732
	1973	691,400	315	36,741,009	116,638	367054	327638	1249
	1974	707,600	333	50,519,626	151,711	375440	333954	1430
	1975	718,600	350	58,295,732	166,559		336953	
	1976	728,300	350	64,585,334	184,530		352148	1872
	1977	737,000	350	66,311,882	189,463	424892	367398	
	1978	742,600	350	67,746,396	193,561	436347	376260	2251
	1979	756,000	350	68,765,000	196,471	452449	388788	2392
2,398,740	1980	764,600	400	71,601,744	179,004	454316	389576	2461
2,398,480	1981	767,600	400	73,546,802	183,867	476995		
2,589,190	1982	776,100	400	74,109,528	185,274	495629		
2,591,635	1983	789,100	395	75,051,618	190,004	515002		
2,901,320	1984	797,800	440	76,260,187	173,319	525599		
2,828,640	1985	804,300	440	74,816,485	170,037	544976		
3,146,030	1986	810,400	459	74,410,104	162,114	556935		
3,078,500	1987	818,400	460	74,066,369	161,014	571738	475140	3332

Transit Buses-Ridership.xls

	1988	824,100	470	74,467,760	158,442	579998		
5,049,350	1989	831,300	475	74,964,453	157,820	599379		
5,350,940	1990	838,534	475	75,648,930	159,261	612742		4308
5,048,550	1991	850,510	475	72,815,706	153,296	613119		4309
4,884,270	1992	863,959	475	72,980,668	153,644	611513	489093	3558
	1993	870,348	495	75,557,318	152,641	604602	483237	3316
	1994	878,591	501	77,338,147	154,368	600087		
	1995	881,399	525	72,745,086	138,562	601239		
	1996	883,443	525	68,923,459	131,283	598772		
	1997	886,711	525	68,634,884	130,733	595121		
	1998	886,909	525	71,822,553	136,805	594096		
4,560,142	1999	878,906	525	66,236,147	126,164	597610		
4,719,244	2000	875,654	525	66,602,820	126,863	614985	505327	2311
4,250,863	2001	877,496	525	70,384,025	134,065	631232	519586	2269
4,276,077	2002	883,357	525	73,624,474	140,237	643810	531101	2233
4,074,141	2003	889,102	525	69,100,627	131,620	667565	553113	2002
4,464,551	2004	895,895	536	61,297,980	114,362	667565	571648	1947
4,731,843	2005	902,034	525	67,406,827	128,394	714604	594100	1908
4,688,117	2006	906,715	525	70,384,355	134,065	719606	596856	1819
4,694,750	2007	905,601	531	71,749,376	135,121	722486	599309	1770

SOURCE: Hawaii State Data Books, various editions at DBEDT Library, Honolulu

Transit Buses-Ridership.xls

From: JimBrewer ReneeIng [mailto:jimbrewer_reneeing@yahoo.com]
Sent: Saturday, February 07, 2009 12:00 AM
To: jimbrewer_reneeing@yahoo.com
Cc: Yoshioka, Wayne; Mr. Ted Matley
Subject: Honolulu Draft EIS comments

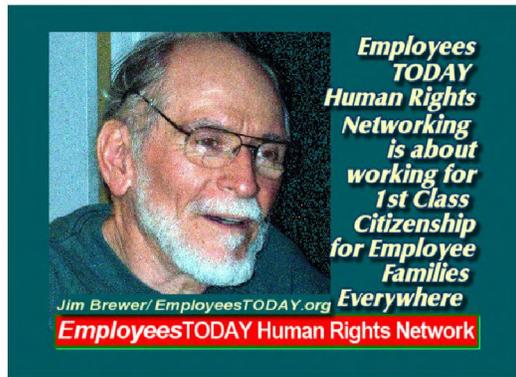
Dear Sirs,

Attached are my DEIS comments.

Aloha.

Jim Brewer

2/10/2009



Department of Transportation Services
City and County of Honolulu, 650 South King Street
3rd Floor, Honolulu, HI 96813

February 6, 2009

ALOHA,

These comments, following a few prefatory remarks, are submitted in accordance with the instructions from your DTS websites as indicated below.

I and my life partner and spouse, Renee Ing, have been public policy advocates and educators working to serve “the needs, hopes and dreams of Hawaii’s Employee Families” for more than thirty (30) years.

Renee Ing retired from the City and County of Honolulu’ Department of Parks and Recreation after thirty-three (33) of service to various communities.

I am a partially disabled U.S. Navy veteran, serving first in the amphibious navy, then two (2) years (1958-1960) on an admiral’s staff in the Philippines—maintaining central classified files and then working in the staff legal office; and, after that, serving on the front lines of the Cold War in nuclear-powered Polaris fleet intercontinental ballistic missile submarines. My last submarine duty was aboard the USS Kamehameha (SSBN642). I am living my seventieth (70th) year of life and serving the 16th year as executive producer, editor and co-host of the public access television program—*EmployeesTODAY*, cable channel 54, Sundays at 5-6pm.

The following comments are submitted per the cut-and-pasted instructions enclosed within the following brackets: (this e-mailed copy contains typo-corrections as well as amendments designated in blue ink below)

[<http://www.honolulutransit.org/>

Making a Comment—The comment period for the project’s Draft Environmental Impact Statement has been extended to February 6, 2009. During this period, comments on the Draft EIS will be accepted via:

- In writing to the Department of Transportation Services, 650 South King Street, 3rd Floor, Honolulu, Hawaii 96813. Comments must be received or postmarked by February 6, 2009.
- By clicking the "Contact Us" tab or [this link](#).

The public comment period is mandated by federal and state laws. All comments received will be considered as the Final is prepared by the FTA and the City. Relevant comments will be responded to in writing.

<http://www.honolulutransit.org/contact/>

Comments or Input About the Project

For online comments on the Draft EIS, please use the form below. Comments can also be sent to the Department of Transportation Services, City and County of Honolulu, 650 South King Street, 3rd Floor, Honolulu, HI 96813. Please include your name, address, telephone number and, if applicable, your organization or business whether you submit comments online or in writing.

Comments on the Draft EIS must be postmarked or submitted in person or via this website by February 6, 2009.

You may also use the form below for any other question, comment, or suggestion about the Project as well. Mahalo.

[* Required Fields]

Would you like to be added to our mailing list?

Please specify your preference:

Both Email Standard None]

My comments and input about the Draft EIS for the Honolulu High-Capacity Corridor Project follow:

1. This is a thoroughly incomplete and misleading document. It offers Steel-on-Steel Rail and a ridiculous straw man of "No Build," as so-called "alternatives." One choice or nothing is absurd. This however is a very honest statement. There was only one choice from the very beginning.
2. This document should have examined and evaluated the rubber-tire-on-concrete automated bi-modal magnet-guided Virtual Rail/Super-Bus Rapid Transit (i.e., the Phileas Advanced Public Transport System), Urban Maglev—as opposed to Inter-City heavy bullet train-type MagLev (magnetic-levitation), and Mono-Rail; as well as, Steel-on-Steel (SOS) Light and Heavy Urban Rail. This should have been done with the benefit of concrete and specific proposals requested officially by the City and County.
3. This DEIS document is the product of a several year campaign to impose on the people of O'ahu a predetermined Washington, D.C.-style Steel-on-Steel Rail "Public Works Project," with a slight Bridge-to-Nowhere make-work smell to it.
This was done with only a façade of democratic public input. That was abundantly clear as the process proceeded; to those who were following the issue. You would hear this sentiment expressed all along the way at Council hearings, public meetings and elsewhere; which, by-the-way were not "informational" as described by FTA guidelines; but really Steel-On-Steel sales jobs evidently paid for with federal and local taxpayer money. **Is this not illegal? If not, it should be. If so, should the FTA not look into this matter?**
4. I refer to a slight smell of "bridge-to-nowhere" because of the extravagant cost of Steel-on-Steel (SOS). I am as convinced as anyone that we definitely need this elevated public rapid transit fixed guideway corridor project. However, I am convinced that a Phileas-like system is, by-far, the most affordable, cost-effective, flexible and future-adaptable system for O'ahu. (see this web address—
<http://etmag.homestead.com/AboutPhileasMagnetRailSuperExpress.html>)
All of this is especially relevant on this day (February 6, 2009) when I heard one economist on TV refer to America's economic crisis as a "depression" instead of recession.
[We are going to have to learn to live within our means as was the case in the late 1930s when I was born. We simply cannot pay the extravagant price being asked for this particular kind of urban rail (SOS)—which has been caught up with; and, is now, for instance, beginning to be left behind by automated magnetically and electronically-guided hi-tech BRT—fully automated BRT that can do everything urban steel rail can do; and, increasingly more so.]
5. I ask that we reconsider where we are now; and, in the spirit of consensus which was not seen in the 51% vote for SOS in November, 2009. Even then, when the fact of the long recession/depression had not yet sunk in, the poll conducted before the election showed 59% of O'ahu residents wanted "rail;" but 55% said that SOS was too expensive.

So, let's step back and take careful measure of everything with another DEIS. One that is informed and prompted by the realization of a radically changed recession/depression economy. A DEIS that will enable an unbiased procurement process to choose most prudently what will be best for the citizens of O'ahu among every "alternative" urban rail technology making their proposals and then re-look at them with new eyes.

Mahalo,

James R. Brewer, Jr.
P.O. Box 23403
Honolulu, Hawaii 96823-3403



UNITED STATES DISTRICT COURT

CHAMBERS OF
HELEN GILMOR
CHIEF UNITED STATES DISTRICT JUDGE

DISTRICT OF HAWAII
300 ALA MOANA BOULEVARD, C-400
HONOLULU, HAWAII 96850-0400

TELEPHONE
(808) 541-3502
FACSIMILE
(808) 541-3579

January 22, 2009

The Honorable Todd K. Apo, Councilmember
Honolulu City Council
530 S. King Street, Room 202
Honolulu, HI 96913

Re: Honolulu Rail Transit System (Honolulu High
Capacity Transit Corridor Project, 2008/PIM-1);
Security Risk for Federal Court Building

Dear Councilman Apo:

I write on behalf of the Judges of the United States District Court to strongly voice our opposition to the proposed route of the Honolulu Rail Transit System on Halekauwila Street immediately adjacent to the Federal Court Building. The proposed Halekauwila Street route, or any route similarly close to the Federal Courthouse, raises unacceptable severe security concerns - exposing our Courthouse to potential terrorists' gunfire and/or bombing such as occurred in Oklahoma City and within trains in Madrid, or to a lone attack by an individual holding a grudge against a particular Judge. We believe there are suitable alternative routes other than Halekauwila Street (such as Queen Street, which we understand from Mr. Kenneth Toru Hamayasu, Chief of the Rapid Transit Division of the Department of Transportation Services of the City and County of Honolulu, was the City's initial choice for this route).

We previously expressed our deep concern over this matter by letter dated November 28, 2008, to Mr. Leslie T. Rogers, Regional Administrator of the Federal Transit Administration. We reiterated our position by letter dated December 9, 2008, addressed to The Honorable Nestor Garcia, Chairman of the City Council Transportation and Public Works

Committee. Copies of both of these letters were sent to Mr. Hamayasu.

We received a response dated December 24, 2008 from Mr. Wayne Y. Yoshioka, Director of the Department of Transportation Services of the City and County of Honolulu, informing us that any changes to the rail transit system route on Halekauwila Street would require City Council action. Accordingly, we are now addressing our concerns directly to the City Council.

We understand from an article in the Honolulu Advertiser on January 3, 2009, that the City intends to pursue an "aggressive schedule," including such steps as promptly issuing requests for proposals on design/build contracts for the project's first phase, and revising a final Environmental Impact Statement for Federal approval. An article in the Honolulu Advertiser on January 11, 2009, reports that a risk management feasibility study contract will be awarded next month, and that the City has introduced Bill 63 to allow the City administration to seek construction proposals without Council approval. We urge the City Council to consider relocating the rail transit system route to avoid Halekauwila Street before making any costly commitments as to this route prior to the final review by the Federal Transit Administration.

On October 16 of last year we met with Mr. Hamayasu to express our concern about the high security risk to which the Federal Courthouse would be exposed should the rail transit system run on Halekauwila Street. He informed us that he did not feel there are any viable alternatives to Halekauwila Street, and that any change would be highly unlikely and would require Honolulu City Council approval. We disagree that there are no reasonable alternatives. We believe that Queen Street, King Street, Beretania Street, and possibly other streets could be utilized instead. We recognize, as does Mr. Hamayasu, that any route (including Halekauwila Street) presents problems.

We understand from our discussion with Mr. Hamayasu that the guideway structure will be 45 feet above street level and will pass within a mere 45 feet of the Federal Courthouse building. Our Court building is 4 stories high, so the guideway structure will be at the same level as the windows of three Judges' chambers. The guideway structure will be 25 feet wide, providing 2 sets of tracks for trains proceeding in either direction. There will be approximately 50 trains, with a train passing by our Courthouse during rush hours every 3 minutes in

each direction. As noted in the draft Environmental Impact Statement, Halekauwila Street is an unusually narrow street. Moreover, currently there is no public transport system along this street.

Subsequent to our meeting with Mr. Hamayasu, we met with the City's security committee. The security committee presented us with its security analysis entitled "Honolulu Rail Transit Project Potential Threats to Federal Court Building from Transit Viaduct". The City's security committee acknowledged that this security analysis was prepared only after our earlier meeting with Mr. Hamayasu, and that previously no consideration had been given to the Federal Courthouse's unique security concerns. It was also noted that neither the U.S. Marshal nor any other federal court security representative was previously consulted or even contacted regarding a proposed transit line running along Halekauwila Street adjacent to the Federal Courthouse. Nor was the owner of the Federal Building and Courthouse given any notice of the proposed Halekauwila Street route. We enclose a copy of letter dated December 15, 2008, from Michael D. Larson, Property Manager, U.S. General Services Administrator, Public Building Service, PJKK Federal Building, 300 Ala Moana Boulevard, expressing concerns over the Halekauwila Street route and the lack of any notice. The City's security committee also acknowledged that none of the security specialists who participated in preparing its analysis was familiar with security standards for Federal Courthouses.

The City's security analysis concludes that "the possibility of an assault from the viaduct to the Courthouse is deemed to be most improbable for many reasons;" yet the analysis fails to effectively address our concerns. As an example, our primary concern is detonation of explosives placed inside a train triggered by a cell phone operated by terrorists from a far distance (similar to what occurred in the Madrid attacks). This could be accomplished in a number of ways; such as, several people carrying sufficient explosives boarding a train several stops before the Federal Courthouse and exiting one or two stops before the Courthouse after leaving the explosives on board, or simply by several suicide bombers. Further, the security enhancements suggested by the City's analysis would afford little, if any, protection from a major bomb blast within a passing train.

After the Oklahoma City bombing and the terrorists attacks of September 11, certain security issues affecting the Federal Courthouse were recognized, and concrete berms and

planters were placed along Halekauwila Street to impede trucks with bombs intent on destroying our Court building as happened in Oklahoma City and Lebanon. A cable secured fence was constructed around the lawn area on the northwest side of the Courthouse, and security patrols were implemented.

We are still at war with terrorists who want to destroy us - and will be for years to come. Federal buildings have been prime targets.

The proposed rail transit system on Halekauwila Street would expose the Federal Courthouse to a much greater risk, similar to the train bombings which occurred in Madrid. We urge that you consider this security risk thoroughly, and we request that the City re-route the transit system to utilize a street other than Halekauwila Street.

Please do not hesitate to contact us should you have any questions concerning the above. Our judges would be pleased to meet with you and show you the close proximity of the proposed guideway structure to our chambers.

Very truly yours,

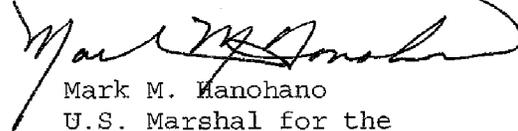
A handwritten signature in dark ink, appearing to read 'Helen Gillmor', with a long horizontal flourish extending to the right.

Chief Judge Helen Gillmor

As the U.S. Marshal for the District of Hawaii, I concur with the above assessment of the Judges of this District that the proposed route of the Honolulu Rail Transit System on Halekauwila Street presents a severe security risk to the Federal Court building, and I join in opposing this route.

Dated: January 23, 2009.

Very truly yours,



Mark M. Manohano
U.S. Marshal for the
District of Hawaii

Enclosure

cc: Mr. Leslie T. Rogers
Regional Administrator
Federal Transit Administration

Ms. Sherry Little
Deputy Administrator
Federal Transit Administration

Kenneth Toru Hamayasu, P.E.
Chief, Rapid Transit Division
Department of Transportation Services
City and County of Honolulu

Mr. Wayne Yoshioka
Director of the Department
of Transportation Services

Mr. Harry Berliner
Department of Transportation Services



U. S. General Services Administration
Public Buildings Service
PJKK Federal Building
300 Ala Moana Boulevard, Suite 1-336
Honolulu, Hawaii 96850
(808) 541-1950
Fax: (808) 541-3601

December 15, 2008

Wayne Yoshioka, Director
Department of Transportation
City and County of Honolulu
650 S. King Street, 3rd Floor
Honolulu, Hawaii 96813

Dear Mr. Yoshioka:

The purpose of this letter is to express our concerns over the proposed Honolulu High Capacity Transit Corridor Project.

The United States General Services Administration is the record owner of the Prince Jonah Kuhio Kalaniana'ole Federal Building and Courthouse located at 300 Ala Moana Boulevard ("PJKK Building"). We have never received any notice from the City and County of Honolulu Department of Transportation Services Rapid Transit Division (DOT) about this project. As such, we were surprised to learn that the proposed project entails the construction and operation of an elevated transit system along a narrow street directly abutting the PJKK Building on Halekawila Street. As a federal agency and property owner significantly impacted by the proposed project, DOT is required to invite us to participate in the scoping process which appears to have occurred in late Dec 2005 and January 2006. Nor have we received any of the multiple notices of intent issued for this project and the draft Environmental Impact Statement. See List of Draft EIS recipients attached to the Draft EIS.

We hope that this project has not proceeded so far that any possibility of our providing meaningful comment at this time has been eliminated. Our obvious concerns include noise, vibration, security and apparent site easement. We are hereby requesting an immediate meeting with DOT in order that we may be briefed as to the proposed project and its particular impact upon the PJKK Building. We would caution DOT not to proceed on the basis that that any property necessary for this project (including air rights) along Halekawila can be obtained through the eminent domain process since this process is not available against the United States.

We trust that DOT will immediately correct its notice procedures and now include us on the mailing list for this project and provide all documents prepared and invitations of public meetings for the proposed project to the United States of America. Please note that all information should be sent to the PJKK Building as follows:

Michael D. Larson, Property Manager
Public Buildings Service
US General Services Administration
Prince Kuhio Federal Building & US Courthouse
300 Ala Moana Blvd., Suite 1-336
Honolulu, HI 96850-4992
(808) 541-3632
michael.larson@gsa.gov

We look forward to hearing from you at your earliest convenience. Thank you.

Sincerely,



Michael D. Larson
Property Manager

cc: Carrie Okinaga, Corporation Counsel
Faith Miyamoto, Chief of Transportation Planning
Leslie T. Rogers, Regional Administrator



NATIVE HAWAIIAN LEGAL CORPORATION

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297862

January 30, 2009

Wayne Y. Yoshioka
Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, HI 96813

Katherine Puana Kealoha
OEQC
235 South Beretania, Suite 702,
Honolulu, HI 96813.

Pua Aiu
State Historic Preservation Division
Department of Land & Natural Resources
601 Kamokila Blvd Suite 555
Kapolei HI 96707

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

Advisory Council on Historic Preservation
Old Post Office Building
1100 Pennsylvania Ave NW, Ste. 809
Washington DC 20004

I am writing on behalf of Paulette Ka'anohiokalani Kaleikini, who has retained the services of the Native Hawaiian Legal Corporation in order to protect *iwi* along the proposed transit corridor from unnecessary disturbance.

The City has failed to provide adequate information on the risks of encountering ancient Hawaiian burial remains (*iwi kūpuna*) in the Draft Environmental Impact Statement despite the clear requirements of the National Environmental Policy Act, section 106 of the National Historic Preservation Act, HRS Chapter 343, HRS Chapter 6E and the Hawai'i Constitution Art. XII § 7. Prior to decisionmaking, the City must have sufficient information to objectively evaluate the impacts of the high-capacity transit system on native Hawaiian burials. With this information the City can reach an informed decision on (a) whether to move forward with the project and (b) how the project can be redesigned or re-routed so that burials are not affected.

Services made possible with major funding from the Office of Hawaiian Affairs.



Ni'olo. Upright, straight, stately, tall and straight as a tree without branches; sharply peaked, as mountains. Fig., righteous, correct.

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The Statutory Scheme for Protecting Iwi Kūpuna. Under the statutory schemes provided by both HEPA, NEPA, and the NHPA, decision-makers must gather the required relevant information that will allow it to *avoid* disturbances of and impacts on preexisting iwi kūpuna, with as much advance information on them so the chances of desecrating them during construction are minimized and ultimately eliminated. A contractor building the rail system should not have to move iwi kūpuna in the midst of construction, if proper investigation and burial identification is completed prior to decisionmaking.

The State Constitution provides that the:

... State shall protect all rights, customarily and traditionally exercised for subsistence, cultural and religious purposes and possessed by ahupua`a tenants who are descendants of native Hawaiians who inhabited the Hawaiian Islands prior to 1778, subject to the right of the State to regulate such rights.

Haw. Const. Art. XII § 7. As such, the State and all its agencies are “required under the Hawaii Constitution to preserve and protect customary and traditional practices of native Hawaiians.” *Ka Pa`akai O Ka`aina v. Land Use Comm'n*, 94 Hawai`i 31, 45 (2000). This places the State under “an affirmative duty” to “protect these rights and to prevent any interference with the exercise of these rights.” *Id.* In order to fulfill its duty to preserve and protect customary and traditional native Hawaiian rights to the extent feasible, the state and its political subdivisions:

must -- at a minimum -- make specific findings and conclusions as to the following: (1) the identity and scope of “valued cultural, historical, or natural resources” in the ... area, including the extent to which traditional and customary native Hawaiian rights are exercised in the petition area; (2) the extent to which those resources --including traditional and customary native Hawaiian rights -- will be affected or impaired by the proposed action; and (3) the feasible action, if any, to be taken . . . to reasonably protect native Hawaiian rights if they are found to exist.

Ka Pa`akai 94 Haw. at 47; See also HRS §§ 205A-4(a), 205A-2(b)(2) and 205A-5(b).

Under HRS chapter 6E, the Island Burial Councils, consisting of a majority of cultural practitioners sensitive to burial matters, have primary jurisdiction over the fate of the iwi kūpuna at rest in “previously identified” burial sites. HRS § 6E-43; HAR § 13-300-33. On the other hand, if those same burials are “inadvertently discovered” because no archaeological inventory survey identified and located them beforehand, the staff of the SHPD must determine the treatment disposition of these burials. HRS § 6E-43.5; HAR § 13-300-40. The only rational reading of this statute is that the island burial council should be given as much information as early as possible in order to assure the proper treatment of any burial remains which could be impacted by development. Accordingly, the State Historic Preservation Division (SHPD) must assure that the councils get as much timely and complete information on the presence and location of iwi kūpuna as possible, so the council may properly exercise its role.

Moreover, the environmental review process requires in part the completion of a “cultural impact assessment” that is designed to shed light on a full range of issues, including the presence of iwi kūpuna which could be impacted by any development. HRS chapter 343. *The Sierra Club v. State Department of Transportation*, 115 Haw. 299, 319; 167 P.3d 292, 326 (2007), citing *Sierra Club v. Hawai'i Tourism Auth.*, 100 Hawai'i 242, 266, 251, 59 P.3d 877, 886, 901 (2002) (declaring that the main thrust of HEPA is to require agencies to consider the environmental effects of projects before action is taken.) This information should be provided at the earliest practicable time in the development review process. *Id.* at 320, 167 P.3d at 327 (mandating an environmental assessment for such action at the earliest practicable time to determine whether an environmental impact statement is required).

Furthermore, Section 106 of the National Historic Preservation Act of 1966 (Public Law 102-575) mandates, in part:

The head of any Federal agency having direct or indirect jurisdiction over a proposed Federal or federally assisted undertaking in any State and the head of any Federal department or independent agency having authority to license any undertaking shall, prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license, as the case may be, take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register. ...

(Emphasis added). 16 U.S.C. 470f.

The implementation of Section 106 therefore mandates that any federal agency providing financial support for any undertaking engage in *advance* consultation with affected native Hawaiian organizations who attach religious and cultural significance to historic properties which may be affected. That consultation must precede any choice of alternatives. See, <http://www.achp.gov/regs-nhos.html> for specific official Advisory Council on Historic Preservation guidance in conforming to these consultation requirements.¹

A History of Desecration. In recent years, hundreds of burials have been disturbed in urban Honolulu – most of them *after* projects have been approved, contrary to legislative intent. Repeatedly, in dozens of construction projects conducted within the Honolulu urban corridor, the SHPD summarily approved commencement of construction without archaeological inventory

¹ In particular, the federal guidelines for this process specifies:

The agency must make a reasonable and good faith effort to identify Native Hawaiian organizations that might attach religious and cultural significance to historic properties in the area of potential effects and invite them to be consulting parties.

...

The agency consults with Native Hawaiian organizations to develop and evaluate alternatives to avoid, minimize, or mitigate adverse effects.

surveying in advance. For example, as the SHPD argued in a legal challenge to its handling of the construction of the Keeaumoku Wal Mart store,

... Because the probability of historic sites including burials in the area was low, the State did not recommend any further archeological work for the project. ... Because of the history of this area, land use, environmental data, and the low incidence of burials in surrounding and nearby areas, this project was treated the same as numerous other projects in the nearby and surrounding areas. See Declaration of Sara Collins.

Hui Malama I Na Kūpuna O Hawai'i Nei v. Wal-Mart, Civ. No. 03-1-1112-05 (1st Cir. Ct. 2003), Defendants State of Hawaii, Department of Land and Natural Resources, State Historic Preservation Division, Peter Young, and Holly McEldowney's Memorandum in Opposition to Plaintiffs' Motion for Preliminary Injunction filed June 20, 2003 (hereafter, "2003 SHPD Memo"). In 2003, the SHPD, and developers in general whose projects it reviewed, repeatedly and systematically allowed minimal archaeological review of areas such as the Keeaumoku Wal Mart site, under the mistaken presumption that no burials were likely to be present in such circumstances. This approach was egregiously wanting in terms of protecting these public trust resources.

Following this time period, officials at the State Historic Preservation Division belatedly recognized that its previous presumption that no further archaeological survey work in the Honolulu urban corridor was necessary due to prior ground disturbances might be false, given a pattern of unexpected disturbances:

21. According to SHPD records, between 1986 and 2002, in the areas from River Street to Keaumoku Street, and from Nimitz and King Street, 308 human burials have been found on twenty-six different project sites. Five burials in two projects were preserved in place, and 303 burials were relocated.

22. The 303 burials that were relocated include all of the remains that could have been considered a concentration such as 116 burials found during archeological monitoring of the Queen Street widening project near Kawaihao Church Cemetery, or the 11 burials (of 25 total relocated) from the Honuakaha Smallpox Cemetery that were found during an inventory survey conducted for the Brewery/Honuakaha development project.

Declaration of Sara Collins, attached to 2003 SHPD Memo. Thus, according to the SHPD, its own data confirmed that hundreds of iwi kūpuna had been systematically disturbed by construction activity within the Honolulu urban corridor for 16 years because of the failure to require advance archaeological inventory surveying. The SHPD allowed the vast majority, 303 of the 308 remains, to be relocated. The mistaken presumption was that prior ground disturbing construction activity within this urban corridor obviated the need to look further.

Simultaneously, the City and County of Honolulu avoided professional reviews of sites targeted for development by failing to submit proposed permits to the SHPD for professional review and comment as required under HRS § 6E-42. These failures to implement that statute are currently on appellate review by the Hawai'i Supreme Court. Appellate review was necessitated by the City's refusal to reasonably interpret its trust obligations to request review and comment from the SHPD under that statute. The City contends that, notwithstanding its total lack of expertise in the area, its own unilateral assessment of the potential impact on iwi kūpuna of pending permit applications is all that is required.

Usurpation of the Role of the Burial Council. Most disturbing, this pattern of relying on prior ground disturbances to relax more rigorous archaeological analysis has sadly resulted in other more serious procedural consequences. Had properly conducted archaeological surveys identified and located burials in advance of construction, the work of the O'ahu Island Burial Council could begin in earnest and with the luxury of time to process all the information, in advance of any pressured environment once construction starts. This would provide iwi kupuna with the dignity and respect they clearly deserve.

Accordingly, the failure to rigorously attempt to identify and locate iwi kūpuna so they are categorized as "previously identified" resulted in the transfer of power and accountability for protecting burials from the island burial council, consisting primarily of cultural practitioners sensitive to burial concerns, to the professional archaeological staff at the SHPD, which is less equipped to deal with the cultural appropriateness of these issues and are saddled with the pressure placed on them by the relationships between state administrative officials and developers. Moreover, when "inadvertently discovered" iwi kūpuna are subject to disposition determination by the SHPD staff, it technically has only 2-3 days to make that determination, typically under the financial pressures facing the developer who must otherwise halt construction. In contrast, the island burial council typically has 90 days to act on a "previously identified" burial site, after it has had a chance to identify cultural and lineal descendants notified of the presence of burials in an area. This extended period and less pressured atmosphere allows for better decisions on often sensitive and contentious matters.

Lessons Learned. This systemic desecration of iwi kūpuna for at least 16 years (and probably longer) apparently caught no one's attention until the Wal Mart litigation, and then subsequently in the legal challenge to the SHPD's handling of the General Growth Properties construction of the future Whole Foods store site and planned condominium complex at its nearby Auahi Street properties. *Kaleikini v. Young*, Civ. No. 07-1-0067-01 RKOL (1st Cir Ct 2006).

During the *Wal Mart* litigation, the SHPD suggested it acknowledged lessons from its past failings in summarizing the data it had been accumulating:

8. The nature and extent of prior ground disturbance and development may be a reliable indicator of the probable presence or absence of subsurface historic sites. If

prior buildings or structures have not had deeply excavated foundations or pilings, or if there has been little or no prior installation of such features as underground storage tanks or wastewater systems, it is more likely that historic sites, including human burials, are still present below the ground surface.

9. With regard to underlying soil characteristics, there is generally a higher probability of subsurface historic sites, including human burials, in areas underlain by sand deposits.

10. Historical data - such as, inter alia, early written accounts or records, maps, and Mahele information - can indicate the potential for subsurface historic sites, if the subject parcel has not undergone substantial, subsequent modification.

11. Previous archeological work - including inventory survey, data recovery, and monitoring - provides valuable information on the probable presence or absence of subsurface historic sites. Archeological reports on such work normally contain descriptive data of any historic sites found, and include stratigraphic profiles of the buried cultural layers and underlying soil deposits.

Declaration of Sara Collins, attached to 2003 SHPD Memo. These same lessons bear on the current proposed construction of the Rail Transit system.

There is a growing body of knowledge and information about the presence and location of iwi kūpuna along the contemplated rail transit route. The City needs to conscientiously search for and obtain as much advance information on the location of iwi kūpuna along its entire route as early as possible to effect reasoned decision-making on the routing of the system. It should not be swayed by previous ground disturbances that do not impact subsurface features, like iwi kūpuna. It should be conscious of the presence of sand deposits anywhere developments are proposed. It should review the growing knowledge base from past projects which have unearthed burials and build upon that material and information.

Need for Correction. The failure to follow the law has already disrupted hundreds of what should have been "previously identified" burials in the urban corridor between River and Keaumoku Streets. These are properties which have immense religious and cultural significance to Hawaiians. Had the statutes been followed, subsequent construction activity should never have "inadvertently discovered" these burials and forced their relocation. Repeating these same mistakes with the planned mass transit construction will undermine state and federal statutes designed to protect historic properties of this sort.

Given the high likelihood that burials are located along the route of the proposed transit corridor, clearly past practices must change. The law and the importance of protecting the dignity of these burials require no less.

In short, well in advance of any planning and design decisions, the City should perform an archaeological inventory survey, including subsurface testing, of all areas where (1) stations could be located (b) support pillars could be located and (c) existing underground infrastructure will be moved. It is highly inappropriate and offensive to iwi kupuna and native Hawaiians to delay such testing until after decisionmaking. The information generated AFTER such surveys must and should be included in any DEIS, in order to give the public, interested Hawaiian organizations, and individuals the opportunity to comment on it. Under HEPA, NEPA, and HRS chapter 6E, this information is needed now to ensure that an informed decision is made. Additionally, any delay could jeopardize federal funding because of failure to comply with Section 106 of the NHPA, particularly in developing alternatives to the transit routing.² Federal guidelines would restrict taking any action that fails to account for the views of affected native Hawaiian organizations.

In fact, page 4-143 of the DIES states "Native Hawaiian testimonies in Land Commission Award claims indicate that there are documented burials within the study corridor." By acknowledging it has this information, the City is duty-bound to suspend its current approach and comply with the statutory schemes designed to protect these historic properties of religious and cultural significance to so many Hawaiians. Much more advance investigation and surveying is required before any DEIS is made public for comment.

In truth, the contemplated action in the DEIS has it backwards. On page 4-163, the DEIS reads, "Prior to construction, additional archaeological work would be completed to investigate the potential for sub-surface deposits. This additional work would focus on locations of columns, once they are known." Contrary to this proposed approach, the City must first investigate and generate information regarding burial sites so that the City will not locate columns, stations and other underground work where known burial sites are identified and located.

Moreover, the City cannot and should not avoid information that would help locate and identify such historic properties. Instead, it should affirmatively and aggressively attempt to

² Specifically, the Advisory Council on Historic Preservation requires, in part, the development of alternatives in consultation with native Hawaiian organizations:

Involvement of Native Hawaiian organizations in the development of program alternatives

- The agency must consult with affected Native Hawaiian organizations in the development of program alternatives.
- If a program alternative may affect historic properties of religious and cultural significance to a Native Hawaiian organization, the agency shall identify those organizations and consult with them.
- The agency and ACHP must take into account the views of Native Hawaiian organizations in reaching a final decision.

See, Advisory Council on Historic Preservation at: <http://www.achp.gov/regs-nhos.html>.

gather it so complete information is available to generate alternatives, as contemplated under the Section 106 process. The City should also include all this information in this version of the DEIS. Its omission denies affected native Hawaiian organizations the opportunity to be truly engaged and involved in consulting with the applicable federal agency so that these organizations can have a substantive role in the alternatives developed. If it ignores the omitted information, the City will be proceeding down a treacherous path that can only lead to unnecessary delay and cultural conflict.

Ms. Kaleikini has additional concerns about the completeness of the DEIS and urges the City to address these points as follows:

- The DEIS includes no meaningful information regarding the impact on burial sites or any discussion regarding alternatives to affecting these sites. This information is crucial to any development of alternatives as required by federal law.
- Section 4.1 of the DEIS regarding existing land uses should explicitly recognize that burial sites are an existing land use along this corridor.
- Section 4.3 of the DEIS should discuss whether the City plans to displace and relocate existing burial sites and give details about the timing, location and process related to each of these relocations and displacements.
- Section 4.6 of the DEIS should note that desecration – including the relocation – of existing burial sites – is an issue of environmental injustice. The DEIS should, as such, discuss the impact of continuing the pattern set by previous developments, especially in the Honolulu urban core, as outlined above.
- Section 4.17 should be revised in the same manner sections 4.1, 4.3 and 4.6 should be.

Most importantly, these sections of the DEIS need to be amended to identify where burial sites may be so that stations, pillars and underground infrastructure work can be proposed in areas that will not affect burial sites. The need for developing alternatives is crucial and affording affected native Hawaiian organizations the ability and the opportunity to consult on these alternatives is essential. Without the supporting information to allow for a discussion of alternatives, the DEIS is fatally flawed.

Sincerely,



Camille K. Kalama
Attorney for Ms. Kaleikini

297860

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DEPARTMENT OF LAND AND NATURAL RESOURCES

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February 2, 2009

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

Subject: Honolulu High Capacity Transit Corridor Project (City and County of Honolulu)
Draft Environmental Impact Statement/Section 4(f) Evaluation

Dear Mr. Yoshioka:

Thank you for the opportunity to review the above-referenced submittal received November 2008, regarding improved transportation equity in the corridor between Kapolei and the University of Hawai'i at Manoa on the island of Oahu. After review by the Department of Land and Natural Resources (DLNR), division comments have been compiled. The following is representative of the State Historic Preservation Division, the Commission on Water Resource Management and Division of Aquatic Resources, the Division of Engineering, Land Management, the Division of Forestry and Wildlife, and State Parks.

I. Historic Preservation

The State Historic Preservation Division (SHPD) disagrees with the Federal Transit Administration (FTA) that this project will have "no adverse effect" on known and potentially unknown historic properties, potential burial sites, cultural landscapes and traditional cultural properties. The FTA's determination has the potential to eradicate over 80 potentially eligible known sites and overlooks impacts existing viewplanes in Ewa, Chinatown and to individual properties. Additionally, the SHPD has concerns about the treatment of potential burials and archaeological sites, including cultural layers that may be found during the archaeological inventory phase. To date the State Historic Preservation Officer has not concurred the FTA's determination.

A. Architecture: The Architecture Branch provides documents on the draft Historic Resources Technical Report on September 26, 2008 (2008.3762/0809AL44). On December 17, 2008, the SHPD Architecture Branch participated in a workshop

regarding effect determinations for the proposed Transit Corridor project as part of ongoing Section 106 consultation under the National Historic Preservation Act alongside representatives from Parsons Brinckerhoff (PB), the City and County of Honolulu's Department of Transportation Services, Historic Hawai'i Foundation, and the National Trust for Historic Preservation. A total of 83 architectural resources within the area of potential effect have been determined eligible for nomination to the National Register of Historic Places. PB staff presented a finding of adverse effect for a total of seven properties: Solmirin House; Afuso House; Higa Fourplex; Teixeira House; Kamani Trees (Dillingham Blvd.); Dillingham Transportation Building; and the Boulevard Saimin property. A finding of no historic properties affected or no adverse effect was presented for the remaining 76 properties located along the corridor.

SHPD Architecture Branch has expressed concern over these preliminary determinations on a number of points. First, a finding of no historic properties affected implies that no historic properties are present in the area of potential effect or that the undertaking will have no effect as defined in 36 CFR Part 800.16(i). However, it appears that FTA has only affected the project's direct affects and has not taken into account the indirect affects of the project on historic resources. For example, the raised guideway may impede customary viewplanes, changes to the scale and character of the setting, or transit based development around stations may have long-term impacts to the historic resource.

SHPD believes that visual effect must be given greater consideration where it concerns impacts to integrity of setting, feeling, and association. For example, the indirect effects of guideway crossings on Nu'uuanu Stream Bridge and Hono'uli'uli Stream Bridge. Other resources that deserve additional consideration for indirect impacts per 36 CFR Part 800.5(a)(2)(v), include the 'Aiea (Honolulu Plantation) Cemetery, Tong Fat Wood Tenement Buildings, Aloha Tower, OR & L Depot, Mother Waldron Park, Walker Park, Irwin Park, and the Aloha Chapel. SHPD suggested that simulations be developed to analyze the character of visual and atmospheric effects and parcel takings to this and other individual resources. Adverse effects are not confined to direct impacts to a parcel and can include cumulative and far-reaching impacts to historic resources as provoked by the Project, including proposed transit based development around transit stations.

The above should also be duly re-considered in regards to constructive use determinations under Section 4(f) of the Department of Transportation Act. Per 23 CFR Part 774.15(a), as published in the Federal Register Vol., 73, No. 49 (March 12, 2008): "A constructive use occurs when the transportation project does not incorporate land from a Section 4(f) property, but the project's proximity impacts are so severe that the protected activities, features, or attributes that qualify the property for protection under Section 4(f) are substantially impaired." Impairments include noise level increase, obstruction or elimination of primary views, restriction of

access, vibration impacts, etc. Table 5-2 cites *de minimis* findings for direct use determination under Section 4(f) for the six Quonset hut grouping along Dillingham Boulevard, Chinatown historic district (see below), Hawaiian Electric, Radford High School, and Pearl Harbor National Historic Landmark (see below). These determinations are still pending.

Regarding the Chinatown historic district, listed on the National Register of Historic Places on January 17, 1973, SHPD expressed specific concerns. The district nomination records the following description:

“The boundaries of the district, as established by the Hawai‘i Historic Places Review Board, are as follows: a 50 ft. line on the *‘ewa* (north) side of Nu‘uanu Stream, the *mauka* (east) side of Beretania Street, a line 50 ft. from the building line on the Diamond Head (south) side of Nu‘uanu Avenue, and 50 ft. *makai* (west) of the longest pier stretching into Honolulu Harbor. The major reason for its early development and continuous history as a commercial area was due to the close proximity to Honolulu Harbor.”

Under statement of significance, the nomination reads:

“Throughout the whole of its 180 years as a trading center in the Pacific, Honolulu has always been closely identified with its harbor--the principal channel of contact with the outside world. It is, however, that portion of Honolulu immediately adjacent to the harbor at the mouth of Nu‘uanu Stream which holds the longest continuous history of native and immigrant settlement and where the story of Hawai‘i’s common folk has been most compactly unfolded (...)”

As the intimate connection between the architectural district and the waterfront are called out as character-defining features of the National Register nomination, SHPD has significant concerns regarding a determination of no adverse effect to the district.

SHPD Architecture is in receipt of the FTA’s December 11, 2008 letter inviting consultation with the Secretary of the Interior regarding potential adverse effect to the Pearl Harbor National Historic Landmark. SHPD looks forward to continuing consultation regarding this site. We are in receipt of the Historic Hawai‘i Foundation’s (HHF) December 10, 2008 letter which raises questions regarding the inadequacy of the description given in the Draft EIS to the vital significance of the National Historic Landmark.

Moreover, in reference to the above-named correspondence, please verify that the resources of the former Naval Air Station Barber’s Point and lands west of the West Loch station were omitted because they will be fully consulted on in a separate Draft EIS at a later time. As referenced by HHF, discussion of the resources associated

with former Marine Corps Air Station 'Ewa Field should parallel the import of the newly designated Valor in the Pacific National Monument.

Discussion of effect determinations and the above-named points is scheduled to continue with consulting parties. SHPD Architecture participated in a driving tour of the proposed route (Airport alternative) with PB staff and the Historic Hawai'i Foundation on January 9. We will resume discussion of draft mitigation commitments following closer concurrence on effect determinations. Regarding Table 4-5, "Acquisitions and Displacements Summary," please provide an itemized list of how many parcel acquisitions and displacements by land use impact eligible historic resources. Finally, please note that National Register criteria considerations D and G are not cited regarding methodology. Federal Transit Administration has not yet completed its review for effect determinations pending our office's response to individual eligibility determinations.

- B. Archaeology: The Area of Proposed Effect (APE) was divided into 10 different sub-areas to evaluate below-ground effects. The proposed project covers the fundable twenty-mile segment of the corridor between East Kapolei and the Ala Moana Center with alternatives for both Fixed Guideway Transit Alternatives of the Salt Lake and Airport routes. The project does affect potential human burials, subsurface features and cultural deposits that have not yet previously been identified. We agree that once column locations are identified archaeological inventory work would focus on these locations and if historic properties are identified then mitigation plans should include archaeological monitoring, possible archaeological data recovery and burial treatment plans. SHPD participating in on-going 106 consultation on a Programmatic Agreement to address the above issues.
- C. Culture and History: SHPD Culture and History Branch concurs that the transit project as a whole will change the character of the physical features within the corridor (36CFR 800.5). SHPD is specifically concerned about the affect view planes from traditional lookout points such as Makakilo and Pu'u Kapolei. As stated in our September 26, 2008 correspondence: "Furthermore, we were encouraged that at our meeting it was indicated that indirect impacts to landscape and setting, including view sheds *makai* to *mauka*, will be examined to determine the broader impact of the corridor itself. We believe that this macroscopic dimension will aid in accurately reflecting the comprehensive effect of the proposed project and in turn facilitate identification of appropriate mitigation." Other examples of character changing impacts would include those to landscapes such as the Banana Patch community, Sumida Watercress Farm and Aiea Plantation Cemetery. At the same time, we do recognize and appreciate that some modifications to the alignment have been made specifically to minimize adverse effect.

The Oahu Island Burial Council (OIBC), Hui Malama I Na Kapono, and Office of Hawaiian Affairs have been consulted, as stipulated in the National Historic Preservation Act, Section

106. OIBC at their January 14, 2009, meeting summarized their consultation work with HTA but seemed to be only addressing the Programmatic Agreement concerns and not the Draft EIS or relevant studies. We will defer their comments on the Draft EIS at this time.

We understand that a Memorandum of Agreement is being developed to address the concerns of the Architecture and a Programmatic Agreement is being developed to address Archaeology and Cultural/History respectively. Also, please note that the Advisory Council on Historic Preservation, National Park Service, and the National Trust for Historic Preservation were not listed as consulting parties in the Draft EIS.

We have not reviewed the *Honolulu High Capacity Transit Corridor Project Archaeological Resources Technical Report*. In a separate transmittal shortly forthcoming, the SHPD will comment in more detail regarding the findings of the technical report. We look forward to the Archaeological Inventory Survey Plan (Phase I) which will be done by the construction phases, along with an Archaeological Inventory Survey Report(s) and an Archaeological Monitoring Plan.

If there are any questions, please contact Pua Aiu, SHPD Administrator, at 692-8015.

II. Aquatics and Water Resource Management

The proposed Honolulu High-Capacity Transit Corridor Route will cross the following streams: Honouliuli, Waikele, Kapakahi, Kalo'i Gulch, Waiawa, Waimalu, Kalauao, Aiea, Halawa, Moanalua, Kalihi, Kapalama, and Nu'uaniu which all empty into the Pacific Ocean along the southern coast of the island of Oahu. All these streams are perennial except for Kapakahi and Kalo'i Gulch which are non-perennial. The Division of Aquatic Resources (DAR) has conducted many biological surveys in Waikele, Waiawa, Halawa, Moanalua, Kalihi, and Nu'uaniu streams and has observed native macrofauna. The estuarine, lower and middle reaches native macrofauna which may be impacted by the transit corridor include native fish species such as *Stenogobius hawaiiensis*, *Eleotris sandwicensis*, *Mugil cephalus*, *Kuhlia xenura*, *Kuhlia sandwicensis*, and the native freshwater crustacean, *Macrobrachium grandimanus*. Other native macrofauna which migrate to the upper reaches would also be impacted during their migration through this corridor. Impacts on the native macrofauna and other aquatic resources can be minimized by avoiding any work in the stream channels or along banks. Impacts on the nearshore reefs and fauna would also be minimized by not disturbing the stream channels or banks and addressing heavy rainfall runoff from this project.

Additionally, the following mitigative measures should be implemented during the construction of the fixed rail transit system and associated areas to minimize the potential for erosion, siltation and pollution of the aquatic environment include:

1. Lands denuded of vegetation should be planted or covered as quickly as possible to prevent erosion;

2. Scheduling site work (particularly the excavation and grading) during periods of minimal rainfall;
3. Use to silt fences or other means to prevent sediments from entering the stream; and
4. Preventing construction materials, petroleum products, debris and landscaping products from falling, blowing or leaching into the aquatic environment.

We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMP's may earn credit toward LEED certification. More information on stormwater BMPs can be found at <http://hawaii.gov/dbedt/czm/initiative/lid.php>.

There may be the potential for ground or surface water degradation/contamination and we recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality.

A Stream Channel Alteration Permit is required by CWRM before any alteration(s) can be made to the bed and/or banks of a stream channel. The planned source of water for this project has not been identified in the Draft EIS report, therefore, we cannot determine what permits or petitions are required from our office, or whether there are potential impacts to water resources.

We recommend that the Final EIS disclose projected potable and non-potable water demands associated with the project, including indirect and cumulative effects such as the City and County's proposed transit oriented development that will surround the rail system. We also recommend that the proposed sources to meet these demands be identified.

If there are any questions, please contact Ken Kawahara, Water Deputy, at 587-0214.

III. Engineering

DLNR, Engineering Division, has reviewed the subject document, and have no comments at this time regarding flood zone(s) traversed by proposed project alignment. However, we do have the following general comments:

1. Column construction in streams will likely trigger comments related to aquatic habitat and biological/environmental issues. Response to these issues would have to be prepared.
2. As required by the City and County of Honolulu's Flood Plain Management Ordinance, any construction planned in a Flood Zone designated as AE (Floodway) will require a detailed floodway study and/or no risk certification.
3. A Conditional Letter of Map Revision (CLOMR) is required if there are any changes in water level (44 CFR 65.12).

4. Note that FEMA is conducting a Flood Insurance Risk Study that will update approximately 60 miles (Kaena Point to Kawailoa Point) of coastal flood hazard boundaries. Preliminary study results have been issued to the City and County of Honolulu, Department of Planning and Permitting.

Please note that the project site must comply with the rules and regulations of the National Flood Insurance Program (NFIP) presented in Title 44 of the Code of Federal Regulations (44CFR), whenever development within a Special Flood Hazard Area is undertaken. Please be advised that 44CFR indicates the minimum standards set forth by the NFIP. Your Community's local flood ordinance may prove to be more restrictive and thus take precedence over the minimum NFIP standards.

If there are any questions, please contact Eric Hirano, Engineering Administer, at 587-0230.

IV. Land

Among the lands owned and managed by DLNR are two parcels in East Kapolei, Ewa, Hawai'i, located west of the proposed North-South Road alignment and mauka and makai of Farrington Highway. The two parcels are identified by Tax Map Key Numbers (1) 9-1-17:86; and 9-1-18:05 (the "DLNR Parcels"). These parcels have excellent long-term development potential, and DLNR has accordingly identified these parcels as future income producing lands to support DLNR's operations and maintenance/management of the State's public lands and natural and cultural resources. DLNR has also communicated its desire to the City and County of Honolulu (the "City") to have these parcels rezoned to allow for commercial and/or other income-producing uses.

Various sections, figures, and tables in the Draft EIS provide for the fixed guideway alignment and a park-and-ride facility to be located within the DLNR Parcels, e.g., Figures 2-2, 2-3, 2-4, 2-5, 2-15, 2-38, 2-44, 4-3, Table 2-6, Appendix A. However, it is not clear whether these parcels are included among the properties identified by the City for acquisition (see Section 4.3 and Table 4-5) and whether compensation will be paid for any such acquisition.

The conveyance of any easement or other rights over the DLNR Parcels to allow such facilities, and the amount of compensation to be paid for such easement/rights, if any, requires the approval of the Board of Land and Natural Resources (BLNR). As of the date of this memorandum, BLNR has not granted any such approval, and therefore, BLNR's approval should be added to the list of Anticipated Permits and Approvals required for the proposed project (Table 4-37). It should also be noted, however, that DLNR has had prior discussions with the City regarding use of portions of the DLNR Parcels for the proposed transit project and DLNR's desire to rezone the DLNR parcels, and DLNR intends to continue to work with the City on these issues.

We understand that either route proposed in the Draft EIS involves some State Lands managed by other State agencies or entities. In most cases, these State Lands have been set aside to the government agency for a specific purpose, pursuant to Section 171-11, HRS. Any uses deviated from the specific purposes in the set aside require approval from the Governor and the BLNR.

The State is currently prohibited from conveying any portion of ceded lands due to a Hawai'i Supreme Court decision dated January 31, 2008. If any proposed acquisition of property requires fee title conveyance of the ceded lands, the outcome of the appeal filed by the State to the US Supreme Court may affect the final design of the project.

For future easy reference, it may be helpful if the Final EIS contains a table on the acquisition with information on ownership and current uses on the affected properties.

If there are any questions, please contact Morris Atta, Land Administrator, at 587-0456.

V. Forestry and Wildlife

According to comments submitted September 15, 2008, the Division of Forestry and Wildlife (DOFAW) stated that on Page S-1 – *Abutilon* is mentioned as “threatened,” but it is actually listed as “endangered” according to State and Federal law. DOFAW would like to provide the following for your consideration.

The existing State Department of Transportation Habitat Conservation Plan (HCP) for *Abutilon*, covers only a limited geographic area related to North-South road (DOT), Kapolei Parkway, University of Hawaii West Oahu, DHHL right-of-entry and subdivision, and DLNR future development plans (pgs 9-18). Additional DHHL lands are included under a Certificate of Inclusion registered with the Land Court. The City and County of Honolulu land ownership was identified in the original HCP (pg 9) and a Certificate of Inclusion issued for a portion of their lands. However, the current HCP does not include all affected lands or current planned activities within the rail transit corridor (see attached Table 3. Landownership of Parcels at Kapolei Properties). Activities and lands within the HCP area can be included by an additional Certificate of Inclusion, but activities outside the HCP area will need an amendment or new HCP.

Mitigation activities should address increased fire management measures. Although the current HCP includes a fire management strategy, it does not take the proposed project into consideration, so it does not address fire concerns for the project under review. The project under review could create new threats to the *Abutilon* reserve, with concern of discarded cigarettes or equipment sparks for example.

The level of fire management identified in the current HCP includes:

“A fire management strategy consisting for the following measures is being implemented to ensure that the plants are not accidentally destroyed.

- Identification of fire fighting resources available near the Kapolei population;
- Provide information to fire stations to assist them in protecting *A. menziesii* from fire;
- Identification of water resources near the Kapolei population.

The details of the fire management strategies are described in the Final Interim Management Report for *Abutilon menziesii* (DLNR DOFAW 2003, Appendix G).” (p. 21).

If additional plants are discovered outside the boundaries of the lands covered under the current HCP, then the transit corridor will need a new Habitat Conservation Plan (see attached information on HCP and ITL) or an amendment to the existing HCP. Additionally, should a plant survey of the transit corridor show no endangered plants in the Kapolei-Ewa area, it does not constitute a finding of no plants present because plants can emerge following rainfall or scarification. Therefore, it is recommended that multiple surveys are done and that the biology of endangered flora and fauna be considered, especially that of the *Abutilon*.

The issue of invasive species is not addressed in the Honolulu High-Capacity Transit Draft EIS. The implementation of this project creates risks related to the introduction of new harmful invasive species, weeds or pests that could be brought into Oahu by importation of heavy equipment and materials sourced from sites off island, be it from other islands or continental locations. For example the red imported fire ant is a serious pest in a number of southern and coastal states including: CA, TX, NC, AR, NM, DE, and in other areas around the world. Recent economic input analysis indicated that if established in Hawai‘i, the estimated negative impacts to Hawai‘i’s economy could be as high as \$200 million within 20 years and it would affect our way of life and human health. Apart from the potential introductions from out-of-state import risks are the intra-state risks between islands. A number of pests are present on other islands in Hawai‘i but not present or are under control on Oahu, e.g. miconia, little fire ant and coqui frogs. Appropriate mitigation would involve implementing prevention measures, paying close attention to pests at the site of origin for incoming equipment and materials, cleaning, inspections and treatment both before shipping and after arrival on Oahu would reduce these risks significantly.

The Draft EIS describes plans for the planting of trees and other landscaping projects. Nursery plants sourced from outer islands are a known pathway for “hitchhiker pests,” and should be subject to inspections and appropriate treatment. Also, the plants that are considered for planting could themselves become harmful invaders or contribute to existing problems, if not screened properly. Species under consideration for planting should be reviewed using the University of Hawai‘i, Weed Risk Assessment system that allows high-risk potentially harmful species to be identified, while low risk alternatives could be a more suitable species selected for this project.

The subject project Draft EIS did not address tree removal plans, or lack thereof, in the rail transit corridor. If tree removal is part of the construction process, there is concern in central Honolulu in the Kapiolani Blvd. area where a population of white tern, *Gygis alba* or Manu-o-kū, is known to nest.

Further mitigation could involve implementing pre and post construction surveys to determine what plant species are present along the transit pathway and remove any potentially invasive species as a post construction mitigation action. If the prevention mitigation measures mentioned above are implemented successfully, this latter problem will likely be minor or insignificant.

If there are any questions, please contact Paul Conry, DOFAW Administer, at 587-4182.

VI. State Parks

The subject project Draft EIS does not acknowledge the transit corridors alignment near State Parks, and the impacts it may have on those areas.

Section 5.4.1 of the Draft EIS states that the project will require direct property acquisition of several recreational areas, one of which is Ke'ehi Lagoon Beach Park, resulting in a section 4(f) use. Directly adjacent to the beach park is the Hawai'i Disabled American Veteran's (DAV) Keehi Lagoon Memorial that was set aside to the department and is operated and maintained by the Hawai'i DAV. Its location may place it near the alignment for both the Airport and Salt Lake alternatives, however, there is no mention of it in the document.

We also note that Aiea Bay State Recreation Area, also under our jurisdiction and a section 4(f) area, was discussed in the Draft EIS and determined to have no use based on the criteria for review of 4(f) properties. There is concern that the criteria used to make this determination is unclear.

If there are any questions, please contact Dan Quinn, State Parks Administrator, at 587-0292.

Thank you for the opportunity to submit comments.

Sincerely,


Laura H. Thielen, Chairperson
Department of Land and Natural Resources

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TRANSPORTATION SERVICES

c: Mr. Ted Matley, FTA Region IX

LINDA LINGLE
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JIRO A. SUMADA

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

IN REPLY REFER TO:

STP 8.3074

January 29, 2009

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

Dear Mr. Yoshioka;

Subject: Honolulu High Capacity Transit Corridor Project Draft Environmental
Impact Statement (DEIS) and/Section 4(f) Evaluation

Thank you for providing the subject document for review and comments.

The State Department of Transportation (DOT) understands that the subject DEIS discusses a project by the City and County of Honolulu, Department of Transportation Services (DTS), for the development of a High Capacity Transit Corridor Project ("Project") that would provide a fixed guideway transit service on Oahu in a travel corridor between Kapolei, with potential expansion to the University of Hawaii at Manoa (UH Manoa) and Waikiki.

Four alternatives are identified via a series of screening and scoping studies. This DEIS evaluates those four alternatives:

1. No Build Alternative
2. Fixed Guideway Transit Alternative via Salt Lake Boulevard (Salt Lake Alternative)
3. Fixed Guideway Transit Alternative via the Airport (Airport Alternative)
4. Fixed Guideway Transit Alternative via the Airport and Salt Lake Boulevard (Airport & Salt Lake Alternative)

The Locally Preferred Alternative selected by the Honolulu City Council includes a fixed guideway transit system from East Kapolei to Ala Moana Center and planned extensions to West Kapolei, UH Manoa and Waikiki. The system would use steel-wheel-on-steel-rail technology and all parts of the system would either be elevated or in exclusive right-of-ways. The Project also requires the construction of transit stations and supporting facilities. Further, some city bus services will be reconfigured to align with the proposed transit stations.

AR00057722

The Project will generate significant impacts to DOT airports, highways and harbor facilities. The fixed guideway rail system should be viewed as part of a comprehensive, multi- and inter-modal transportation system. This requires early, continuous, direct coordination and careful design and construction planning with the DOT. The Project requires connectivity with other transportation and transit systems as well as all other means of transportation used by commuters and travelers such as, but not limited to, buses, taxis, shuttles, service vans, motorcycles, scooters, bicycles and walking. The Project must be carefully integrated within the existing systems and enable travelers' transfers between these systems. DOT therefore recommends that these linkages and public use patterns for all modes of travel (i.e. bus, bike, pedestrian, etc.) be further analyzed. DOT is particularly interested in the evaluations, findings and recommendations at the sites where DOT facilities are located.

The following comments are from the DOT's three modal divisions, who should be consulted during the Project's planning, design and construction phases for their concerns for impacts to right-of-ways, easements, real property and infrastructure.

AIRPORTS

The two airport alternatives will impact the airport system. DOT requests that DTS contact the Airports Division Planning Section at (808) 838-8810 and address the following issues:

1. The Airports Division understands that the Airport Alternative involves two stations on the Honolulu International Airport (HNL) property on Aolele Street. One is next to the new parking structure and the other is at Lagoon Drive.
2. The station adjacent to the new parking structure will be connected to the structure. Clear signage is necessary for rider's access of the other airport terminal buildings. There are several operational and engineering issues related to a transit station located near an Airport terminal in relative proximity of airport operational areas (AOA). DTS should meet with Airports staff and the Airports modernization team to address the rail station's location, its impact on airport operations and future airport improvements.
3. To ensure that the Lagoon Drive station meets the Federal Aviation Administration (FAA) FAA Part 77 obstruction height limits for the end of Runway 22R, DTS should submit a FAA Form 7460-1, Notice of Proposed Construction or Alteration, to the FAA.
4. DTS should also meet with the Transportation Security Administration (TSA) to review any security issues or requirements for the rail stations at HNL.

HARBORS

The project will generate impacts to the harbors system, particularly where the transit stations are adjacent to Honolulu Harbor. DOT requests that DTS address the following comments and initiate or continue coordination with the Harbors Division Planning Section at (808) 587-1888.

1. Page 2-32. The DOT understands that the rail system interfaces with Nimitz Highway in the area between the Pier 15 area and past the HECO power station area. Figures 2-33 and 2-34 show the two stations in this area. The stations appear to avoid conflicts with the entrances to Harbors' major shipping terminals.
 - a. DOT requests consideration for a station located at the Aloha Tower complex to provide direct access to the complex and to downtown Honolulu via Fort Street. If this location is given consideration, then Harbors Division is willing to discuss options for redeveloping its current office building into a combination parking structure and transit station, subject to the need to satisfy the community's concern regarding the image and appearance of downtown Honolulu and Nimitz Highway as a pathway to Waikiki.
 - b. Given the importance of this section of Nimitz Highway to the waterfront area and to downtown Honolulu, additional study is needed to ensure proper siting of a transfer station. Proper placement is critical for minimizing impacts to the harbor area, the highway system and the Aloha Tower complex, and also for maintaining waterfront access, pedestrian safety, a desirable visual and spatial atmosphere and the proper aesthetics for downtown Honolulu. DTS should consult with DOT and the downtown stakeholders on the location of this transit station.
2. Page 3-14. Please note that Kewalo Basin is DOT Harbors third Oahu harbor but is soon to be transferred to the Hawaii Community Development Authority (HCDA). Charter Boat operations as mentioned in the document occur at this harbor and not at Honolulu or Kalaheo Barbers Point Harbor.
3. Page 3-14. Ocean Recreation is not an activity of DOT's commercial harbor system. Ocean Recreation is under the jurisdiction of the DLNR – Division of Boating and Ocean Recreation.
4. Page 3-14. Trucks carrying freight enter Honolulu Harbor through Nimitz Highway and also Ala Moana Boulevard (at Fort Armstrong). The roadway fronting Fort Armstrong is Ala Moana Boulevard and not Nimitz Highway.
5. Page 3-14. Please also include Kalihi Street in the discussion of freight movement. Eastbound container trucks utilize Kalihi Street to get onto Interstate Route H-1.

6. Page 3-44. The correct name for Oahu's second harbor is Kalaeloa Barbers Point Harbor. It is noted as Barbers Point Harbor on this page and elsewhere.
7. Page 3-48. It is noted that alternative routes may be required as an impact of the construction of the improvements. Any improvement required to facilitate alternative routes (turning radius, etc.) should be the responsibility of the Project as a mitigation measure.
8. Page 4-61. Kewalo Basin should also be included in the discussion of the makai edge.
9. Page 4-171. There is no "Kalaeloa Harbor 2020 Master Plan" or "Honolulu Harbor 2020 Master Plan". The Oahu Commercial Harbors 2020 Master Plan incorporates both Honolulu and Kalaeloa Barbers Point Harbors.

HIGHWAYS

DOT also confirms that there will be impacts to the highway system. At a significant number of locations, the rail line, transit stations and other Project support facilities will be functionally adjacent to, physically abut or transect highway system roadways and right-of-ways. The transit-oriented development (TOD) within the communities around the rail stations will also impact the highways system. DOT requests that DTS address the following comments and initiate or continue coordination with the Highways Division Planning Branch at (808) 587-1830.

1. Chapter 3 various pages. Planning horizon of 2030 is used throughout the document. Standard practice is 20 years after construction completion. With a construction completion in 2018, the planning horizon should be 2038.
2. Page 4-98 3rd paragraph. The reference, "The State of Hawaii regulates community noise pollution through HAR 11-16," is incorrect. The correct reference is HAR 11-46. In addition, Hawaii's noise levels are more restrictive than the Federal levels and the project needs to conform to both requirements. HAR 11-46-4 has maximum permissible sound levels in dBA (dBA defined as the A-weighted sound level or unit of measurement describing the total sound level of all noise as measured with a sound level meter using the "A" weighting network). The following is the maximum level.

	Day time (7am-10pm)	Night time (10pm-7am)
Class A	55	45
Class B	60	50
Class C	70	70

Class A includes all areas equivalent to land zoned residential, conservation, preservation, public space, open space, or similar type.

Class B includes all areas equivalent to lands zoned for multi-family dwellings, apartment, business, commercial, hotel, resort, or similar type.

Class C includes all areas equivalent to lands zoned agriculture, country, industrial, or similar type.

3. Kamehameha Highway Improvements – Waihona Street to Center Drive. DTS should coordinate Project work with improvements to this area.
4. Design Criteria. DOT Highways requests all streetscape improvements by DTS utilize DOT Highway standard drawings, details and specifications. Particularly, as follows:
 - a. A visual picture record of assets within the highway right-of-way prior to construction shall be made by DTS and approved by DOT's Highway Landscape Architect for restoration afterwards. In general, all landscaping shall be restored to its original condition after construction is complete. DTS should provide As-built drawings in the form of both full size drawings and electronic files of all work within the highway right-of-way.
 - b. Work within the highway right-of-way shall employ DOT Highway standard Invasive Species Management specifications and Tree Protection zone construction detail. All transplantable trees as determined by DOT to be removed by construction shall be transplanted at DTS' expense to another State right-of-way site approved by DOT's Highway Landscape Architect.
 - c. DTS shall not move relocated utilities under DOT sidewalks and should consult with DOT for exceptions. New utility boxes shall be screened by landscaping or placed in underground vaults.
 - d. The handling of the anticipated additional trash in between stations needs further explanation.
 - e. All median underneath the rail shall be low maintenance rockscape or decorative paving with limited, shade tolerant plantings at intersections.
 - f. New plantings shall be non-invasive plants as defined by the Hawaii Chapter of the American Society of Landscape Architects. DTS shall employ native plants where they are the best choice for the conditions.

- g. The design of the rail should include measures to limit bird nesting and perches that produce bird droppings.

5. Construction Criteria.

- a. During construction, DTS shall maintain all landscaped areas to DOT Highway standards utilizing DOT maintenance specifications including mowing, edging and trimming, weeding, pruning and care of shrubs and trees, fertilizing, pesticide and herbicides, clearing gutters, swales and ditches, invasive plant removal and rubbish and debris removal and disposal.
- b. DTS shall be responsible for maintaining all irrigation impacted during construction and provide watering as necessary. All site furnishings that are removed during construction including but not limited to traffic signal poles and heads, irrigation controllers and valves, backflow preventers, fence fabric and utility boxes shall be delivered at DTS' expense to the DOT Highways Oahu District Baseyard or disposed of at DTS' expense if DOT does not desire to keep the items.

6 Farrington Highway - Fort Weaver Road to Interstate Route H-1.

- a. In recognition of Farrington Highway as the main street of Waipahu, DOT spent \$4 million dollars in 2002 for a main street revitalization project. In 2005, the project received the Betty Crocker Landscape Award from the Scenic Hawaii organization.

"This project sponsored by the State Department of Transportation helped transform a bleak, lifeless, uninviting part of Farrington Highway for motorists. The result is landscaping effort that quickly changed the area and which will continue to improve..."

- b. DOT's interaction with the Waipahu community has been overwhelming positive and the improvements to Farrington Highway have contributed to a greater sense of pride and renewal in the community. As a result, adjacent properties have been improved and new businesses have moved in along the highway.
- c. Since the Project is going to remove these significant improvements to Waipahu's main street and add a rail structure further affecting the aesthetics, DOT requests DTS consult with DOT and the Waipahu stakeholders to provide equitable improvements to the sidewalks to include material sidewalk improvements, street trees, site furnishings and undergrounding of overhead utilities.

- d. All existing median trees to be removed by Project construction shall be transplanted at DTS' expense to another State right-of-way site approved by DOT's Highway Landscape Architect.
7. Kamehameha Highway - Interstate Route H-1 to Aloha Stadium. Kamehameha Highway is the main street for two communities; Aiea and Pearl City. Since 2005, DOT has worked with the Aiea and Pearl City communities through an extensive public involvement process to identify improvements to this main street. Through this process, the community and DOT agreed to improvements that were suspended pending the outcome of rail. This Project installs a rail structure to the area, which could negatively impact the area aesthetics. Therefore, DOT requests that DTS consult with DOT and the Aiea and Pearl City stakeholders to provide equitable improvements to the sidewalks, such as material sidewalk improvements, street trees, site furnishings, enhancement of areas around Sumida Watercross farms and undergrounding of overhead utilities.
 8. Nimitz Highway - Nuuanu Stream Bridge to Halekauwila Boulevard.
 - a. Nimitz Highway from Nuuanu Stream Bridge to Halekauwila Boulevard abuts the downtown central business district waterfront and some of the most valuable real estate in the State of Hawaii. It is also the point of arrival for all cruise ship visitors to Oahu. Additionally, Hawaii Tourism Authority's research indicates over 80% of Oahu visitors' first impression of Hawaii is driving from the Airport to Waikiki via Nimitz Highway. For over 20 years, the downtown community has explored means to relocate the HECO power plant that detracts from this valuable waterfront area. The addition of a rail structure and station located near the HECO power plant will require further study of the Nimitz Highway corridor and a careful analysis of impacts to the Aloha Tower complex and adjacent harbor facilities. Also, care must be taken to maintain pedestrian safety as well as to avoid creating a less than desirable visual and spatial atmosphere for visitors and residents moving through this area. The aesthetics, image and appearance of downtown Honolulu are areas of great concern to the community. Therefore, DOT requests DTS consult with DOT and downtown stakeholders on this matter and to provide equitable improvements to the sidewalks including material sidewalk improvements, street trees and site furnishings.
 - b. Recognizing the importance of this stretch of Nimitz Highway, in 2008 DOT installed plantings of coconut palms. As such, all existing median trees to be removed by Project construction shall be transplanted at DTS' expense to another state right-of-way site approved by DOT's Highway Landscape Architect.

DOT appreciates the opportunity to provide comments. Given the anticipated and potential impacts to multiple DOT facilities, it would be beneficial to have DTS make periodic presentations to DOT as part of the on-going Project planning and coordination with DOT.

Mr. Wayne Yoshioka
Page 8
January 29, 2009

STP 8.3074

Presentations should cover issues such as the Project task list and timeline, coordination for design and construction phasing, environmental issues and mitigation measures and physical impacts to and integration with DOT airport, harbors and highway systems. Further, these meetings should include all or combinations of the modal divisions based on the particular subject matter or area and location being discussed.

If there are any questions regarding all three modal divisions of DOT, please contact Mr. David Shimokawa of the DOT Statewide Transportation Planning Office at (808) 587-2356.

Very truly yours,



BRENNON T. MORIOKA, PH.D., P.E.
Director of Transportation

c: Mr. Abraham Wong, Federal Highway Administration
Mr. Ted Matley, Federal Transit Administration
Ms. Katherine Kealoha, Office of Environmental Quality Control



GOOD SAMARITAN CHURCH
OF JESUS CHRIST

P.O. Box 31029 • Honolulu, Hawaii 96820-1029
Pastor Isakara "Ike" Sataraka • Phone: (808) 561-5695

297988

DTC
650 S. KING ST.
HONOLULU, HI 96813

Dear Mr. Wayne J. Yoshioka,
Enclosed is the list of our church members
in support of the RAIL system.

Sincerely,


Mala A. Sutt / Secretary

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DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION SERVICES

"Not by might, nor by power but by my Spirit"
Saith the Lord of hosts. Zechariah 4:6

GOOD SAMARITAN CHURCH – MEMBER**JAN 8, 2009**

1. Pastor Isakara 'Ike' Sataraka
2. Elizabeth Sataraka
3. Tanu Sataraka
4. Tracie Sataraka
5. Andrew Sataraka
6. Isaac Sataraka
7. Toreka Sataraka
8. Nathan Sataraka
9. Veronica Sataraka
10. Shekinah Sataraka
11. Zion Sataraka
12. Patboone Anderson
13. Lynnette Talaimatai
14. Troy Talaimatai
15. Shalom Talaimatai
16. Shadracc Talaimatai
17. Terrance Sataraka
18. Petina Sataraka
19. Telika Sataraka
20. Sabine Sataraka
21. Truce Sataraka
22. Thuddes Sataraka
23. Silafaga Faleafine
24. Sam Tapasa
25. Miriam Tapasa
26. Summer Tapasa
27. Shifoh Tapasa
28. Shaddai Tapasa
29. Miriam Faaliga
30. Glassy Faaliga
31. Leauma laulu
32. Fuaao Laufu
33. Leauma LauLu Jr.
34. Simaevaga LauLu
35. Sakiasi LauLu
36. Daisy LauLu
37. Deborah LauFu
38. Sila LauLu
39. Faafo LauLu
40. Zianna LauLu
41. Stephen LauLu
42. Rebecca LauLu
43. Penaia LauLu
44. Atimua Tuumalo

45. Pogisa Tuumalo
46. Taulagi Leano
47. Naoia Leano
48. Faanati Leano
49. Fidellia Leano
50. Felicidee Leano
51. Faith Leano
52. Pone Tuia
53. Veronica Tuia
54. Johnny Tuia
55. Taimane Tuia
56. Dora Leano
57. Molimau Leano
58. Pepe Maulupe
59. Lance Maulupe
60. Olive Maulupe
61. Ariani Maulupe
62. Amani Maulupe
63. Vaovai Sua
64. Malo Sua
65. Adelina Sua
66. Kalala Sua
67. Puleao Lemau
68. Talaleu Lemau
69. Sam Ioane
70. Silafaga Ioane
71. Hans Sua
72. Gloria Sua
73. Kingsten Sua
74. Kobe Sua
75. Kaleb Sua
76. Piliota Failauga
77. Lili Tuia
78. Laavale Maulupe
79. Violini Maulupe
80. Maria Tuaoa
81. Shadrrac Maulupe
82. Manase Faualo
83. Esther Faualo
84. Margaret Faualo
85. Maverick Faualo
86. Emmanuel Faualo
87. Faausu Maeva
88. Jane Maeva
89. Lance Lagafuaina
90. Samson Maeva

137. Fia Jennings
138. Wanda Jennings
139. Faileaso Jennings
140. Iakopo Maileoi
141. Anita Maileoi
142. Richard Maileoi
143. Kiwi Maileoi
144. Ryan Maileoi
145. Alavina Maileoi
146. Patboone Anderson
147. Susana Anderson
148. Diana Anderson
149. Sanele Anderson
150. Kaiserlyn Anderson
151. Faleniu Anderson
152. Rhonda Anderson
153. Bernadine Anderson
154. Amie Anderson
155. Elizabeth Anderson
156. Tauvavae Noa
157. Victoria Noa
158. Lucy Noa
159. Vai Lualemaga
160. Evelyn Lualemaga
161. Rimoni Tuiasosopo
162. Ionatana Pei
163. Elizabeth Pei
164. Eliana Pei
165. Eleanor Pei
166. Ezra Pei
167. Eisha Pei
168. Ethen Pei
169. Timoteo Pei
170. Shari Pei
171. Skyson Pei
172. Tisha Pei
173. Crystal Scanlan*
174. Tofiga Pei
175. Malaea Pei
176. Teuila Fitiausi
177. Jr. Fitiausi
178. Cornelius Fitiausi
179. Courtney Fitiausi
180. Cortessa Fitiausi
181. Corianne Fitiausi
182. Corey Fitiausi



AUALA U'AMEA MO HONOLULU

Matou te manaomia sou manatu i le Aiaia o le Amataga o le Fuafuaina o le Laufanua ma ona Si'omiaga mo le Auala U'amea i Honolulu nei.

O le Auala U'amea o se ala maualuga lea e feso'ota'i ai le itu i Sisifo o Oahu ma le taulaga i Honolulu faapea le fefa'atauaiga i Ala Moana. Ma o aoga nei:

- o le a fa'aleleia ai ala o femalaga'iina
- e fa'aititia ai le tele naunau o ta'avale
- o le a fa'apu'upu'uina ai taimi o femalaga'iga
- ma lagolagoina ai le fa'aopoopoina pea o tagatanu'u i Oahu nei

E mafai ona aumai sou finagalo i le Amataga o Fuafuaga o le Si'osi'omiaga

O le masina o Novema 21, 2008, e amata ai ona talia aloaia ai finagalo lautele o tagatanu'u e le City ma le County o Honolulu faapea le Ofisa o le Feterale. O le a taga'i lelei i ai le aofia o le ofisa lea ua ta'ua o le Draft EIS (e pei ona ta'ua i luga) o fea le tulaga e manuia ai ala ia e tolu ua fuafuaina. Tatala atu le avanoa e talia ai sau fautuaga mo le 45 aso, amata ia Novema 21, 2008, ae fa'agata ia Ianuari 7, 2009.

O fea e maua ai sa'u pepa/kopi o ia aiaiga (Draft EIS) i le gagana Peretania?

E maua i so'o se faletusi a le Setete po'o le City, so'o se Univesete, Ofisa o Femalagaina o lo'o i le 650 South King St, fogafale tolu, po'o le internet i le website www.honolulutransit.org.

E mafai fo'i ona maua fua sau DVD, pe faatonu sau pepa/kopi tusinga lelei i le \$59 i le gagana Peretania lava. Vala'au le telefoni (808) 566-2299 po'o le Internet fo'i, website e pei ona taua i luga. Ia ta'u i ai lou suafa, tuatusi, lau telefoni, ma le gagana o lo'o mana'omia.

E fa'apefea ona fai sa'u manatu i lea tulaga fa'ata'atia?

E mafai ona e faia fa'apea:

- 1) Tusi sau manatu/taofi pe'a faia le iloiloga o le aotelega, pe tusi sa'o ia: Mr. Wayne Yoshioka i le Ofisa lena o Femalagaina, 650 South King St., fogafale tolu, Honolulu, HI 96813.

extended til Feb. 6, 2009

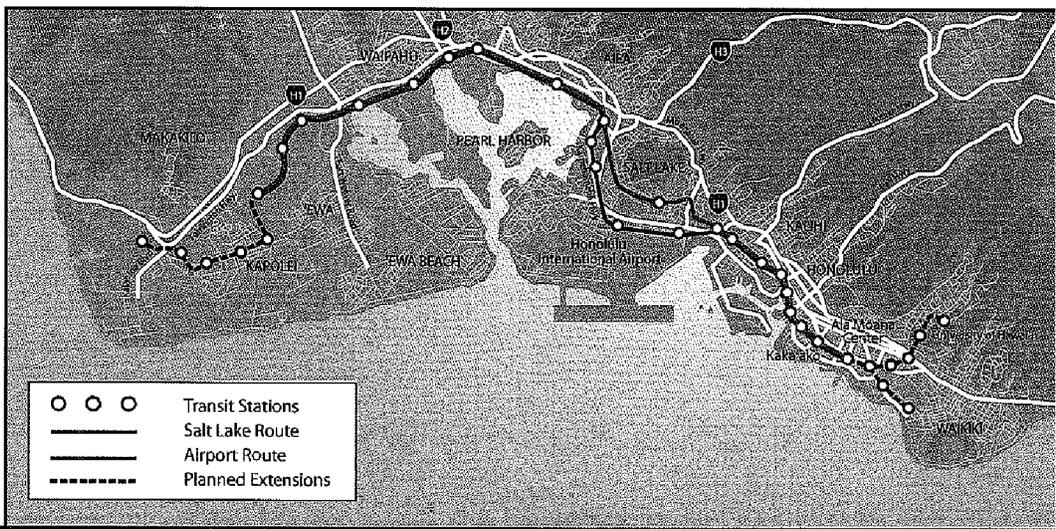
- 2) E mafai ona fa'aleo sou manatu/taofi i se iloiloga a le aotelega o le a saunia lea e le City. O aso o ia fono o le a fa'asilasila atu i le Honolulu Advertiser ma le Honolulu Star Bulletin, ma luga o le Internet i le www.honolulutransit.org

- 3) Va'ai le Internet lena i le website www.honolulutransit.org

E mafai ona ou vala'uina se tasl e fa'alillu upu/gagana i totonu o Fono o le aotelega o tagatanu'u? Ioe. Vala'au le telefoni (808) 566-2299 i le ono aso a'o le'i o'o i le iloiloga. Ta'u i ai lou suafa, telefoni ma le gagana e mana'omia ai le fesoasoani.

Draft EIS Public Hearing Schedule

Date	Time	Area	Location
Saturday, Dec 6	9-11 am	Kapolei	Kapolei Hale 1000 Ulu'ohia St
Monday, Dec 8	6-8 pm	Ala Moana/ McCully	Blaisdell-Hawaii Suite 777 Ward Ave
Tuesday, Dec 9	6-8 pm	Salt Lake	Salt Lake District Park 1159 Ala Lili'oi Pl
Wednesday, Dec 10	6-8 pm	Waipahu	The Filipino Community Ctr 94-428 Mokuola St
Thursday, Dec 11	6-8 pm	Kalihi	Bishop Museum 1525 Bernice St



○ ○ ○	Transit Stations
— — —	Salt Lake Route
- - - - -	Airport Route
· · · · ·	Planned Extensions

297605



HAWAII COMMUNITY DEVELOPMENT AUTHORITY



KAKAOKO KALAELOA

Linda Lingle
Governor

Jonathan W. Y. Lai
Chairperson

Anthony J. H. Ching
Executive Director

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Honolulu, Hawaii
96813

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Web site
www.hcdaweb.org

Ref. No.: PL TRANS 7.18

January 29, 2009

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

Dear Mr. Yoshioka:

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

Thank you for the opportunity to review the Draft Environmental Impact Statement ("DEIS"), Section 4(f) Evaluation, relating to the Honolulu High-Capacity Transit Corridor Project. Please include our comments and your responses in the Final Environmental Impact Statement ("FEIS").

We have the following general comments to offer:

1. Due to the high level of Archaeological Resources Occurrence identified in Chapter 4, Figure 4-50 of the DEIS, we recommend that an Archeological Inventory Survey Plan and Survey be conducted for the proposed route of the Honolulu High-Capacity Transit Corridor Project within the Kakaako and Kalaeloa Community Development Districts. All study and documentation should be coordinated with the State Historic Preservation Office, Department of Land and Natural Resources, State of Hawaii.
2. We are concerned about the impact of the Project to the Queen Street Park as noted on page 5-15 of the DEIS. It appears that the straddle-bent columns would be located within the Mauka portion of the park. Public parks within the Kakaako Community Development District represent an important and scarce resource. We recommend alignment of the Honolulu High-Capacity Transit Corridor in this area.

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to lie entirely within the roadway right-of-way to avoid any loss of park space to straddle-bent columns.

3. Native Hawaiian re-internment burial sites are located within the Ewa portion of the Queen Street Park and within the Mauka Diamond Head corner of Mother Waldron Park. The City and County of Honolulu should coordinate with the State Historic Preservation Office and Oahu Burial Council in identifying and monitoring native Hawaiian burial sites during construction.
4. The Hawaii Community Development Authority ("HCDA") has planning and zoning jurisdiction within Kakaako and Kalaeloa Community Development Districts and a development permit from HCDA is a requirement for any development within these Districts. Development permits from the HCDA shall be required for construction of the transit guideway, transit stations and any other accessory structures associated with the Honolulu High-Capacity Transit Corridor Project within the Kakaako and Kalaeloa Community Development Districts.
5. Small businesses in Central Kakaako are a vital part of the State's economy and include nearly 200 businesses employing close to 1,000 people and generating approximately \$60 million in annual sales. Any impact to these businesses due to construction and operation of the transit project needs to be discussed in the FEIS.
6. Halekauwila Street is identified as the alignment for the Locally Preferred Alternative. It appears that the elevated guideway support columns will encroach into the traffic lanes on Halekauwila Street. If there will be a loss of a travel lane on Halekauwila Street, regional traffic impact due to the loss of travel lane needs to be addressed in the FEIS.

7. It appears that portions of the Locally Preferred Alignment and transit stations are located within lands owned by General Growth Properties, Inc. ("GGP") and Kamehameha Schools ("KS"). The HCDA is currently reviewing master plan applications submitted by both GGP and KS for the development of lands within the Kakaako Community Development District. We request that your department coordinate the alignment as well as the location and detailed design of the stations with the HCDA, GGP, and KS and report its findings and recommendations in the FEIS.
8. The issue of "elevated" or "at-grade" track for the Kakaako and Kalaeloa Districts does not appear to be fully explored. This issue needs to be analyzed in depth and (at a minimum) the Kakaako and Kalaeloa communities need to be engaged. Though the DEIS refers to the possibility of building sections of the transit corridor in Kapolei "at-grade", stakeholder discussions conducted in the Kalaeloa Community Development District have produced support for a grade-separated system. We request that the FEIS include community feedback and analysis of the costs and benefits of constructing "elevated" and "at-grade" tracks for this project.
9. The alignment of the Project within the Kalaeloa Community Development District will impact multiple landowners and created a level of confusion as to the timing, requirements and impacts to future program activities and plans. The FEIS should document any comments received from and response given to the Hawaii Army National Guard, Ford Island Properties, Department of Hawaiian Homes Land, Carmel Partners, Hawaii Public Housing Authority and the Veteran Administration with respect to alignment and other expected impacts of the project upon their land use and programs.
10. The Kalaeloa, Kapolei and Ewa Beach communities currently suffer from the lack of a multi-modal transportation system and the distance to employment centers. The DEIS does not discuss how the Honolulu High-Capacity Transit

Mr. Wayne Yoshioka
Page Four
January 29, 2009

Corridor Project will be integrated into a transit-bus-shuttle system and will meet the needs of these communities.

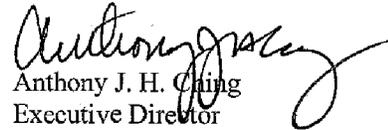
Along with the general comments listed above, specific comments include the following:

- Provide the extent of acquisition of additional right-of-way along alignment including size, location and dimension of anticipated right-of-way acquisition. Page 3-39, Table 3-21.
- Provide more detailed information on neighborhood parking programs. Page 3-44, Section 3.4.5.
- Industrial uses should also be included in the description of Kakaako. Existing Land Use Overview by Planning Area (last paragraph) Page 4-11, Table 4-2.
- Include Kalaeloa Master Plan and Kakaako Community Development District Mauka Area Plans in Future Land Use Plans and Policies, Page 4-13.
- Identify Symbol "H" on Page 4-32, Figure 4-12, as the John A. Burns School of Medicine.
- The Kakaako Community Development District is comprised of 614 acres, including the Makai Area. Page 4-42, Ala Moana-Kakaako. Please note that the Ala Moana Boulevard is not a part of Kakaako Mauka Area.
- Chapter 1, P. g. 1-7, Figure 1-4, Major Activity Centers in the Study Corridor refer to the Kalaeloa Industrial Park near Fort Barrette and Roosevelt Roads. The reference to the Kalaeloa Industrial Park is incorrect as this facility does not exist. The reference should instead refer to the Kalaeloa Community Development District.

Mr. Wayne Yoshioka
Page Five
January 29, 2009

If there are any questions, please feel free to call me at 587-2870.

Sincerely,


Anthony J. H. Ching
Executive Director

AJHC/DN:ak

c: Mr. Ted Matley, FTA Region IX

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Harry A. Saunders
President

January 30, 2009

Mr. Wayne Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street
Honolulu, Hawai'i 96813

Dear Mr. Yoshioka:

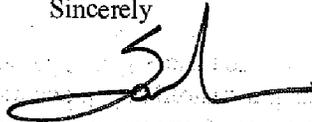
Subject: ***Honolulu High-Capacity Transit Corridor Project
Draft Environmental Impact Statement***

Castle & Cooke supports the acceptance of the Draft Environmental Impact Statement for the proposed Honolulu High-Capacity Transit Corridor Project. This project is critical to address O'ahu's growing transportation demands, particularly in Central O'ahu and 'Ewa where the majority of O'ahu's future population growth and urban development has been designated to occur. We support the rail transit system as a critical component of a multi-model approach needed to address our transportation challenges for the betterment of all O'ahu residents.

We are pleased to see that the project includes provisions for the direct access from the H-2 Freeway to the Pearl Highlands Transit Station. We support the proposed H-2 access ramp to the park-and-ride structure as it represents a direct regional benefit of the transit project to existing Central O'ahu and North Shore commuters and will help support the future growth that has been designated for the Central O'ahu region.

Thank you for the opportunity to comment on the Honolulu High-Capacity Transit Corridor Project. If there are any questions, please contact Bruce Barrett, Executive Vice President, at 548-3746.

Sincerely



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Castle & Cooke Hawai'i consists of the Hawai'i subsidiaries of Castle & Cooke, Inc. which include Castle & Cooke Homes Hawai'i, Inc., Castle & Cooke Properties, Inc., Castle & Cooke Resorts, LLC, and other subsidiaries

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29/20/

December 10, 2008

Mr. Wayne Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street
Honolulu, Hawai'i 96813

**RE: Honolulu High-Capacity Transit Corridor Project,
Review of Draft Environmental Impact Statement (EIS)/Section 4(f) evaluation**

Dear Mr. Yoshioka:

Thank you for referring the above-mentioned project to Historic Hawai'i Foundation (HHF) for review and comment under the National Environmental Policy Act (NEPA) and Section 4(f) of the Department of Transportation Act, 49 USC §303. HHF previously reviewed and provided comments on the Historic Resources Technical Report (September 15, 2008) as a consulting party to the review process under Section 106 of the National Historic Preservation Act (NHPA), pursuant to 36 CFS §800.2.(c)(5) and 800.3(f)(3).

HHF also notes that the Department of Transportation Services has provided notice that it intends to use the process and documentation prepared under NEPA in order to comply with its NHPA Section 106 obligations. HHF shares the concerns raised by the National Trust for Historic Preservation in its letter of Oct. 3, 2008 about combining the two processes. We look forward to the response from the federal agencies and Advisory Council on Historic Preservation to address the propriety of this proposal and the circumstances under which it would be appropriate.

The proposed Honolulu Transit Corridor project will have a dramatic impact on the landscape of the island of O'ahu; this includes not only the direct impact to specific parcels, but primarily the visual effect on the landscape and historic resources. HHF is concerned that the Draft EIS does not accurately take into account these larger impacts, but rather focuses on those adverse effects caused by the direct taking of land.

As indicated in 36 CFR 800.16(i), effect means "alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register." The following activities constitute an adverse effect: physical destruction of or damage to all or part of the resource; alteration of a resource, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary of Interior's standards for the treatment of historic properties; removal of the resource from its historic location; change of the character of the resources' use or of physical features within the setting that contribute to its historic significance; introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic feature; or neglect of a property that causes its deterioration, except where such neglect and



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deterioration are recognized qualities of a property of religious and cultural significance (emphasis added).

Table 4-32 of the draft EIS lists properties preliminarily determined eligible for listing on the National Register of Historic Places. Of these, only seven individual structures were determined to be adversely effected by the proposed project. This assessment is unacceptable, as in a large number of cases the “introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features” will occur. It is crucial that these impacts are recognized and properly mitigated.

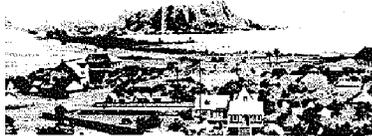
For many of those properties for which it was determined that there will be “no effect” or “no adverse effect,” Table 4-32 indicates the description of the effect as “no property acquisition.” This determination is in error. The mere fact that either no property acquisition or only a minor acquisition occurs does not mean that there is “no effect” or “no adverse effect.” The dramatic visual change and impact to view sheds caused by the presence of the guideway and rail stations does in fact constitute an adverse effect.

It is vital that direct, indirect and cumulative impacts to districts, bridges, view planes, and individual structures as a result of the presence of the guideway and rail stations are acknowledged and properly identified as adverse effects. Table 4-10 acknowledges that visual impacts exist; it needs to be further acknowledged that, where historic resources are present, these impacts likely constitute an adverse effect.

HHF also has serious concerns regarding the evaluation of Pearl Harbor as historic resource. Page 4-59 discusses visually sensitive resources. The paragraph discussing landmarks should differentiate designated National Historic Landmarks (NHL)—which are of extreme importance to our nation’s history—from visual landmarks such as parks and open space. The draft EIS does not do so, thus downplaying the significance of the Pearl Harbor NHL. The sentence of greatest concern reads, “Pearl Harbor is considered a historical landmark because of the part it played in the island’s history.” This is an egregious understatement regarding Pearl Harbor, the bombing of which brought the United States into World War II. It has great significance both to the Nation and to the world for its extreme importance that reaches far beyond its history at a state level. The fact that Pearl Harbor is a designated NHL of great importance to the nation should be clearly stated in the draft EIS.

The visual effects to each area that the transit line will pass through are evaluated in Table 4-10. For the Pearl Harbor segment, the Draft EIS indicates that the visual impact will be moderate, but states that “the guideway would dominate the linear view corridor above the highway. However, Kamehameha Highway is a major transportation corridor and visual effects would not be substantial.” While Kamehameha Highway is a substantial roadway, its impact is nowhere near that of a 60-foot high guideway. Thus, the impact to historic view planes and the character of the National Historic Landmark (NHL) will be high.

We have additional concerns about the assessment of some of the other visual impacts of the project, especially in the Chinatown areas, where in some cases the impact is only listed as moderate. For the view from Maunakea Street looking ma kai, for example, the draft EIS indicates that the



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existing visual quality is high and that the impact would be moderate, even though the assessment of the impact reads: "the guideway and columns would be prominent features in the ma kai views of Honolulu Harbor, partially blocking views of the sky." The EIS should acknowledge the high level of impact, especially given the fact that Chinatown is both listed on the National Register of Historic Places and is designated by the City and County of Honolulu as a Special Design District.

The Honolulu special design district guidelines indicate that there are certain view planes from Chinatown to Honolulu Harbor that are significant and should be preserved. One of the objectives of the district is "to retain ma kai view corridors as a means of retaining the historic link between Chinatown and the harbor." In addition to the visual impact that the transit line will have on the district, it will also impact this historic visual link. For both of these reasons, the project constitutes an adverse effect on the Chinatown District.

In regards to former Naval Air Station Barber's Point, previous documentation in the Historic Resources Technical Report indicated that resources at this site were determined eligible for listing on the National Register. However, these resources have not been included in Table 4-32 listing the historic properties within the Area of Potential Effect (APE). HHF deferred to the State Historic Preservation Division (SHPD) on determinations of eligibility. Please provide an explanation for the changed circumstances that led to a different determination of eligibility for these resources.

The State Historic Preservation Division's letter of September 26, 2008 stated that additional consideration should be given to resources at former Marine Corps Air Station 'Ewa Field. This was not done in this draft EIS. Five sites at Pearl Harbor were recently designated by President Bush as part of the Valor in the Pacific National Monument. Though not officially part of the monument, Barbers Point (Kalaeloa), which was also attacked on December 7, 1941, was one of twelve sites nationwide that received official recognition for its importance of telling the story of World War II in the Pacific. Given its extreme importance and proximity to the transit line, it should be further evaluated.

In previous correspondence, HHF suggested potential measures to mitigate impacts to historic resources from this undertaking. A commitment to providing the mitigation measures, including timelines and responsible parties, needs to be complete as part of the final EIS and made part of the Record of Decision, in addition to any Section 106 documentation.

Since 1974, Historic Hawai'i Foundation has been a statewide leader for historic preservation. A non-profit, membership-based organization, HHF's mission is to preserve and encourage the preservation of Hawai'i's historic buildings, sites, objects and communities.

Thank you for the opportunity to comment. We look forward to the opportunity to discuss the proposed project, the impacts to historic resources and appropriate mitigation efforts.

Very truly yours,



Kiersten Faulkner, AICP
Executive Director



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Copies (via email)

Laura Thielen, State Historic Preservation Officer/Chair, DLNR

Pua Aiu, Administrator, State Historic Preservation Division

Astrid Liverman, Architectural Branch Chief, SHPD

Elaine Jackson-Retondo, National Park Service

Frank Hays, National Park Service

Melia Lane-Kamahele, National Park Service

Betsy Merritt, National Trust for Historic Preservation

Brian Turner, National Trust for Historic Preservation

Kelly Yasaitis Fanizzo, Advisory Council on Historic Preservation

Blythe Semmer, Advisory Council on Historic Preservation

Lawrence Spurgeon, Parson Brinckerhoff

Ann Yoklavich, Mason Architects, Inc.



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297854

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

January 31, 2009

Mr. Yoshioka:

Attachments to this letter contain three pages of general comments and ten pages of specific comments on the draft Environmental Impact Statement produced by the City and County of Honolulu for its High-Capacity Transit Corridor Project. I believe that you and Mayor Hannemann still have time to correct your current direction toward holding a steel wheel on steel rail-only competition, and hope that you seriously consider "reversing course."

I am sure that your department and the contractor team are aware of persistent critical comments in letters and postings to online newspaper articles concerning the transit project. There are the obvious postings from the Stop Rail Now group, but there also are a number of people (aside from me) who want transit but do not like the obvious attempts by the city to limit the competition.

Whether or not members of the State Legislature are serious about making an attempt to seize or delay the surcharge collections going into the special fund for transit, there is little doubt that transit foes are continuing to look for ways to end the project. I recommend that the city make an announcement that there will, indeed, be a fair and open competition for both the guideway development and the transit technology. It would not only deflect a considerable amount of criticism but may return some previous supporters to full backing for the project. Aloha.



Frank Genadio
92-1370 Kikaha Street
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**General Comments on the Honolulu High-Capacity Transit Corridor Project
Draft Environmental Impact Statement (EIS)**

Provided by:



Frank Genadio
92-1370 Kikaha Street
Kapolei, HI 96707
(808) 672-9170

It is necessary to preface my general and specific comments to the draft EIS because, although I remain a strong supporter of fixed-rail, I have become disillusioned by the way in which the project has been handled by the administration of the City and County of Honolulu (the City) and the Honolulu City Council. I am a former member of the Committee for Balanced Transportation (CBT), which was formed as a non-partisan tax-exempt group to foster education for integrated transportation and advocate for a rapid transit system for the island of O'ahu. To assist with that goal, a small grant was received a few years ago from the American Public Transportation Association and (perhaps) \$2,000 remained as of mid-2008. I terminated my CBT membership when I learned in December through a newspaper article that more than \$342,000 (from "contributions" made by transit contractors and their employees and Outrigger Enterprises Inc.) had been "funneled through" the CBT in its "Go Rail Go" guise to back the City's steel wheel on steel rail (SWSR) advocacy. I also was (perhaps I still am) a member of the Transit Solutions Advisory Committee (TSAC; now known as the Transit Advisory Committee) formed by Mayor Mufi Hannemann. There have been no TSAC meetings in the past several months or, if there have been meetings, I have not received an invitation. While a member of the CBT, I also served as a CBT representative to the Citizen Advisory Committee (CAC) of the O'ahu Metropolitan Planning Organization.

As much as I would have liked to continue my (completely voluntary) effort as a member of the City's team, the change in my status stems from my public support for a fair and open competition among all transit system suppliers that qualified, based on the City's own criteria in its Request for Information. I believe that the HSST urban magnetic levitation (mag-lev) system currently operating in Nagoya, Japan would be a strong competitor—if allowed to compete. It also is necessary for me to state that I have no formal connection with the HSST's supplier, Mitsubishi-Itochu, and have not and will not receive any compensation from their companies. My sole intention is seeing Honolulu obtain the best transit system at the best price.

Presumably, the City is meeting all of the legal requirements of the Federal Transit Administration (FTA) before it pursues federal funding for the transit project. It is, however, apparently ignoring the "spirit" of FTA guidelines while following a course of action that is not in the best interests of O'ahu taxpayers and commuters. The EIS must be modified to cover all qualifying rail systems—even if it means additional expenditure of planning and analysis funds

and a delay in the document's completion. (Personally, I feel that the contracted analytical team should have produced a comprehensive product with funding allocated to date.) One has to be impressed by the number of analysts who have worked on this project and their levels of education and experience (as given in the draft EIS)—but one also has to wonder at the seeming lack of imagination and vision shown by the city. Based on what is contained in the draft EIS, particularly in documents from two to three years ago, it appears that the whole process was used to orchestrate for an SWSR system.

My support for the HSST actually stems from a trip to Japan made by Mayor Hannemann and three members of the City Council in 2005. They praised the HSST and were even pictured demonstrating how little effort it took to move the (levitated) 52-ton train (Honolulu Star-Bulletin, October 2005). I then started research into learning more about an urban mag-lev, leading to my advocacy. Both high-speed and urban mag-lev systems operate or are under development in several nations and will undoubtedly continue to proliferate. The Maglev 2008 Conference in San Diego in December demonstrated the level of interest in modernizing U.S. transportation systems. Critics of the mag-lev cite the thousands of miles of steel rail tracks throughout the continental United States that would no longer be of use, leading to the extra expense of building mag-lev guideways. There is no such concern on the island of O'ahu, where we will "start from scratch." Implementation of a modern mag-lev system in Honolulu would not only be effective but would, in fact, be an attraction for this tourism-oriented city.

Concerning the document, a general statement on property acquisition is needed. The tables and paragraphs in Chapter 4 are all based solely on an SWSR system. The numbers would probably apply as well to a rubber tire on concrete rail system but would likely be lower for both monorail and mag-lev systems, which require less space along their guideways.

The discussions in Chapter 5 concerning acquisition of properties, including some of historical significance, are all applicable only to SWSR systems. Analysis of impacts on these properties must be made for each of the other forms of fixed-rail. In the cases of the monorail and mag-lev, the impact would certainly be lessened because of the (relatively) narrower width of their guideways.

The discussion on costs in Chapter 6 applies only to SWSR systems. Rather than comment specifically on each section of the chapter as well as the costs given elsewhere in the document, the following is a summation of the major costs associated with implementation of the HSST urban mag-lev system. (NOTE: I did not find detailed costs for the Hitachi monorail—and will leave any justification for that system up to its supplier. The costs for the HSST are based on presentations made by Itochu representatives to the Honolulu City Council.)

The draft EIS lists costs for the (now selected) Airport Alternative at \$5.433 billion. A steel wheels bridge construction (using 49 percent of total cost) would be \$2.662 billion, or a cost per mile of \$133 million. The HSST supplier estimates construction for the mag-lev guideway would be \$570 million less, or \$2.092 billion, resulting in a cost per mile of \$105 million. Using the steel wheels budget of \$2.662 billion, at least 25 miles of mag-lev guideway could be built (i.e., enough to reach the campus of the University of Hawaii [UH] in Manoa, an important link for ridership, with spurs to the Salt Lake Shopping Center and Waikiki).

Operations and maintenance (O&M) costs also will be cheaper using the HSST. Despite a need for about ten percent additional electricity to levitate the train, the virtually frictionless running of the mag-lev is estimated at 20 to 30 percent less (than an SWSR system) per year. Enormous savings would be realized over 30 years, considerably easing the burden on taxpayers' funding for the transit subsidy. O&M cost comparisons are given on page 8 of the specific comments, for EIS page 6-7. O&M costs savings alone would enable guideway extension into Central O'ahu, a major ridership area. Given the significant savings that can be realized with the HSST, how is it possible for the City to justify limiting the competition to SWSR systems?

The City's plan also is disappointing in its lack of any foresight for some form of express service, which would be likely to create a significant boost in ridership—particularly from West O'ahu into Downtown Honolulu and (eventually) UH and Waikiki. The EIS mentions more than once the possibility of having train operators. Any modern system should be capable of fully automated operations controlled from the transit operations center, and an operator would do nothing more than add to O&M costs.

I remain hopeful that the City will realize that the present course of action is detrimental to the best interests of the taxpayers and commuters of O'ahu, and will pursue a fair and open competition among all qualified transit system suppliers. This can be accomplished by not "tailoring" the specifications (particularly for the guideway) to favor SWSR systems, and by placing a statement prominently up front in any Request for Proposals that states something like "All guideway developers and transit system suppliers that qualified under the City's Request for Information are invited to bid."

IT IS TIME FOR A 21ST CENTURY SOLUTION!

I will end my general comments with the following extract from President Barack Obama's Inaugural Address: "And those of us who manage the public's dollars will be held to account, to spend wisely, reform bad habits, and do our business in the light of day, because only then can we restore the vital trust between a people and their government."

Comment and Rationale

7 Purpose of the Draft EIS Notice of Intent published in federal register
 The actual statement in the Notice of Intent is pertinent to my criticism of the city's actions to date. It states that "The draft EIS would consider five distinct transit technologies: Light rail transit, rapid rail transit, rubber-tired guided vehicles, a magnetic levitation system, and a monorail system." The EIS does not come close to anything resembling a consideration of technologies other than steel wheels on steel rails (SWSR), presumably fitting into the first category above (since it is not planned as being "rapid").

8 Purpose of the Draft EIS ...core 19-mile alignment...
 ...along Salt Lake Boulevard...first
 City Council action has changed the alignment; change "19-mile" to "20-mile" and change "along Salt Lake Boulevard" to "along a route by Honolulu International Airport"

S-4 Alternatives Considered "The panel's report resulted in the City establishing steel wheel operating on steel rail as the technology...
 This eliminated the other technologies from further consideration."
 This statement should be removed because several meetings of the City Council followed the technology panel meetings, which were—to say the least—incomplete because of the requirements of the "Sunshine Law." The council never did pass a bill concerning technology and the panel's recommended SWSR system never received more than four (of nine) positive votes in any committee or full council meeting. It took a while to realize that the panel was, in fact, an SWSR "set-up" with four of five members having either no or very little knowledge of non-SWSR systems. The fifth member, Professor Panos D. Prevedouros (with whom I seldom agree but did in this case), criticized its proceedings extensively in the Honolulu Star-Bulletin's April 17, 2008 edition, in a column titled "Transit panel selection was case study in manipulation." The EIS seems to "downplay" the impact the panel's selection had on subsequent events; for example, it does not provide the names of panel members. The names of the other four panelists must be added so that FTA and U.S. Department of Transportation officials can determine for themselves whether or not this group was objective—or was, in fact, made up of men with little knowledge of non-SWSR systems. Recommend the addition of their names: Chair Ron Tober, Ken Knight, Henry Kolesar, Steve Barsony, and Panos Prevedouros.

S-7 Noise and Vibration A solid parapet wall...to reduce noise levels.
 Change "...noise levels." to "...noise levels if a steel-wheel-on-steel-rail system is selected." Parapet walls and wheel skirts would not be required for the HSST urban magnetic levitation (mag-lev) system because of its much lower noise level. (I do not have noise data on the conventional monorail but it is also likely that such mitigation measures would not be needed.) It also should be noted that the City has never indicated what the (added) costs might be for mitigation measures.

Comment and Rationale

2-3 2.1.1 Screening of a Broad Range... Emerging rail concepts were eliminated because they have never been proven in real-world use and would not meet the rapid implementation schedule for the project.

This statement should be reworded for clarity to "Emerging rail concepts, other than fixed guideway, were eliminated..." Emerging rail concepts are not defined.

2-7 Table 2-2 Alternatives...Rejected Last three rows under technologies.

These three rows need to be removed because of the extremely weak rationale for rejection given in the table. There probably are proprietary aspects of every system being considered for Honolulu's transit project. Suppliers of these three rail technologies, if allowed to compete, would undoubtedly work with City officials to ease any proprietary concerns. The added statement for Magnetic Levitation, "unproven in U.S.," is ridiculous. The first use of a steam locomotive was in the United Kingdom in 1804, and the first commercial use in the United States was in 1829. If anything unproven in the U.S. cannot be considered, we would still be moving people and cargo in covered wagons. It should be noted that the Mitsubishi-Itochu HSST urban mag-lev is now approaching four years of extremely high reliability revenue service in Nagoya, Japan.

2-8 2.1.3 Alternatives Consideration... Statement in discussion of panel selection that ends with "...none of the proprietary technologies offered substantial proven performance, cost, and reliability benefits compared to steel wheel operating on steel rail."

This is just another attempt in the document to justify SWSR systems, and is patently false concerning the HSST mag-lev. Compared to any steel wheels system's performance, the HSST is faster (at 62.5 miles per hour compared to 55), much quieter (in the range of an average television level in a home, or at least twice as quiet as noise-mitigated SWSR), and smoother riding because it is levitated above its guideway beam. As of late last year the HSST had carried more than 30 million passengers with a reliability rating of more than 99.9 percent; can any SWSR system match that? As for cost, the HSST supplier estimates that, at current costs, the 20-mile minimum operable segment (MOS) guideway could be built for \$570 million less than SWSR. For operations and maintenance (O&M) costs, despite about ten percent electricity (needed to levitate the train), the HSST O&M costs would be considerably less per year than SWSR (see details for page 6-7 comment). These benefits are indeed substantial, and indicate that the panel's goal was to justify the City's choice, not perform a real evaluation of each of the suppliers that met the criteria in the Request for Information (RFI). The irrelevancy of the panel makes the remainder of the EIS incomplete because all of its analyses are based solely on SWSR systems. The last two paragraphs of this section (2.1.3) should be removed as the first step in the necessary re-write of this EIS.

Comment and Rationale

- 2-9 2.2 Alternatives Evaluated in...EIS Last paragraph on "A connection to..."
 Based on City Council action, reword this sentence to "A connection to a station along Salt Lake Boulevard could be built as a phasing option.....and Ala Moana Center along the route servicing the Honolulu International Airport." A global search of the document is recommended to change to the new primary option of servicing the airport.
- 2-9 2.2 Build Alternatives Sentence that states "The system would use steel wheel on steel rail technology."
 Based on discussions above, change sentence to read "The system would use a form of fixed-rail technology." A "global" change throughout the document from "steel wheel on steel rail" to "fixed-rail" is recommended.
- 2-9 2.2.2 Build Alternatives Sentence that states "All parts of the guideway would be elevated, except near Leeward Community College, where it would be in exclusive right-of-way."
 This presumes that it has already been determined that the maintenance and storage facility will be at LCC. Earlier in the document, it is indicated that the facility may instead be sited along Farrington Highway. A change from "Leeward Community College" to "the system's maintenance and storage facility" is suggested. A better solution might be a short extension (eventually part of the West Kapolei line) from the westernmost terminus of the MOS into Kalaeloa that could accommodate a facility sited on the flat land that is being acquired by the state. This could be cheaper to build and sooner to be in operation than a facility near LCC.
- 2-19 End of second paragraph on left Change "assumed in to be place" to "assumed to be in place"
 Self-explanatory.
- 2-19 Transit Technology Replace first sentence with more general wording.
 Recommend that first sentence read "The selected transit system will be a form of fixed-rail powered by electricity (Figures 2-9A through 2-9C depict the type of guideway required for each rail technology)."
- 2-20 Figure 2-9 Example Vehicle on Elevated Guideway
 This figure's title should be changed to "Example Steel Wheel on Steel Rail or Rubber Tire on Concrete Vehicle on Elevated Guideway" and the graphic listed as Figure 2-9A. Figures 2-9B and 2-9C should be added and show the guideways for Conventional Monorail and Elevated Magnetic Levitation systems. If the EIS is left as is, and this graphic becomes part of the specifications in any bid or Request for Proposals—leaving suppliers required to build an elevated guideway of 28-32 feet wide—the monorail and mag-lev cost advantages are negated. These two systems are capable of operating on much narrower (and, therefore, less costly and obtrusive) guideways.

Comment and Rationale

4-9 Table 4-1 Street Trees
 Identify the numbers in this table as applying only to SWSR and rubber tire on concrete systems, and provide new calculations (which are likely to be fewer) for monorail and mag-lev systems.

4-33 Cemeteries Typo in second sentence.
 Change "...Stadium-Cand.." to "...Stadium and..."

4-36 Airport Alternative Change "Airforce" to "Air Force"
 Proper usage.

4-39 4.5.2 Affected Environment – Neighborhoods
 In second paragraph, second sentence, change "White" to "Caucasian" as better usage.

4-42 Table 4-8 Year 2000 Demographic Characteristics...
 Suggest heading changes from "White" to "Caucasian" and "Black" to "African-American" as better usage in table and accompanying text on page.

4-45 Ala Moana-Kaka'ako Change "...(TOD) is..." to "...(TOD) are..."
 Self-explanatory.

4-47 Regulatory Context Change "...statues,..." to "...statutes,..."
 Self-explanatory.

4-47 Defining Environmental Justice Areas Change "...Black,..." to "...African-American,..."
 See above on usage; note how it fits better with other terms.

4-51 Table 4-9 Demographic Characteristics of O'ahuMPO...
 Suggest heading changes from "White" to "Caucasian" and "Black" to "African-American" as better usage.

- 4-65 Figure 4-17 Viewpoint 1; and
- 4-66 Figure 4-18 Viewpoint 2; and
- 4-72 Figure 4-24 Viewpoint 8; and
- 4-75 Figure 4-27 Viewpoint 11; and
- 4-76 Figure 4-28 Viewpoint 12; and
- 4-80 Figure 4-32 Viewpoint 16; and
- 4-84 Figure 4-36 Viewpoint 20

These conceptual graphics do not appear to be in scale with the graphic in Figure 2-9, which indicates that the SWSR bridge will be 28-32 feet wide. These figures seem to indicate a guideway only slightly wider than the (5-foot wide) vehicles below. Note the relatively narrow shadow of the guideway in Figure 4-27. Viewpoint 20 seems a little closer to what is expected to be the guideway's

width, but still appears too narrow based on its shadow against the length of the vehicle below. These conceptual graphics need to be redone to more accurately reflect the width of the guideway; the addition of overhead views is suggested. Similar renderings will be needed for monorail and mag-lev guideways.

4-91 Salt Lake Alternative First full paragraph on right
Change "...views along the steam..." to "...views along the stream..."

4-95 4.8.2 Last two sentences of last paragraph.
Should "...Improvement Plan..." be "...Improvement Program...?"

4-97 Figure 4-37 Typical Sound Levels
The term "rail" in two places should be changed to "steel wheels on steel rails" and 50-foot readings should be added for the other three rail systems: rubber tires on concrete, monorail, and magnetic levitation. Discussion of the noise levels of these technologies should be added throughout the Section 4.9.1 discussion.

4-100 Table 4-15 Number of Residential Buildings, Parks, and Schools
with Noise Impacts; and

4-101 Table 4-16 Noise Impacts
The term "Created by Steel Wheel on Steel Rail Systems" should be added to the title of both tables, as well as Figures 4-39, 4-40, 4-41, and 4-42 on subsequent pages. Further study should be initiated to create tables and figures for the other three rail technologies.

4-108 Electric and Magnetic Fields Effect of HSST mag-lev needs to be evaluated
Since magnetism is used to levitate the train, effects of the HSST mag-lev should be included in this specific area. The HSST supplier has testified to the Honolulu City Council that the system has no effect on passengers with pacemakers, so minimal impact is anticipated.

4-137 Table 4-29 Summary of Street Tree Effects/Transplanting...
The number of trees requiring removal or transplanting might be considerably less for the much narrower guideways needed for monorail and mag-lev systems; added tables are needed.

4-149 Table 4-32 Airport Alternative grouping; and
4-150 Table 4-32 Airport & Salt Lake Alternative grouping
Change "CINCPACFLT" and "CINCPAC" to "COMPACFLT" and "PACFLT" respectively in both places. The Commander of the U.S. Pacific Fleet is no longer referred to as a Commander in Chief.

4-166 4.18.2 Station Area Development
The first sentence needs to be updated relative to TOD ordinance in 2008.

<u>Page</u>	<u>Paragraph Title (abbreviated)</u>	<u>Statement on Which Comment is Based</u>	<u>Comment and Rationale</u>
4-166	4.18.2	'Ewa Plain, East Kapolei, UH West O'ahu, and Ho'opili	The Hunt Development Group may have pulled out of its agreement with UH; paragraph needs update.
4-171	Table 4-36	First entry: Ka Makana Ali'i	May need an update; is DeBartolo still involved in this development?
5-3	5.2	Description of the Project	Change "...steel-wheel-steel-rail..." in the last sentence of the first paragraph to "...fixed-rail..." to ensure that a subsequent competition remains open to suppliers of all forms of rail that met the City's criteria in the RFI.
5-3	5.3	Next to last line on right side of page.	Change "...affects..." to "...effects..."
5-8	Table 5-2	Airport Alternative grouping; and	
5-9	Table 5-2	Airport & Salt Lake Alternative grouping	Change "CINCPACFLT" and "CINCPAC" to "COMPACFLT" and "PACFLT" respectively in both places. The Commander of the U.S. Pacific Fleet is no longer referred to as a Commander in Chief.
5-24	Measures to Minimize Harm	Guideway design as narrow as possible.	This statement must be challenged because earlier in the document it is specifically shown as 28-32 feet across. The City is well aware that narrower guideways can be used for both the monorail and mag-lev systems. Since width is a concern, the City must allow suppliers of all forms of fixed-rail to compete. This comment also applies to paragraphs of the same name on pages 5-25, 5-26, and 5-28.
6-3	Table 6-1	Capital Cost Estimates for the Build Alternatives...	This table, in fact, this whole chapter and tables reflect costs associated only with SWSR systems. Similar tables, along with discussion, must be developed for the other forms of fixed-rail transit.
6-4	General Excise and Use Surcharge	Discussion of 0.5 percent surcharge	A sentence needs to be added at the end of this paragraph: "The amount collected through the GET surcharge currently is reduced by ten percent, which goes into the general fund handled by the State Legislature." No relief is anticipated; in fact, the legislature may consider moving all surcharge collections into the general fund for a period of time.

Comment and Rationale

- 6-7 Fare Revenues Fare box recovery ratio
 Operating and maintenance (O&M) costs for the HSST mag-lev are estimated to be considerably less than any SWSR system. Based on the City Council resolution for revenues to be maintained between 27 and 33 percent of annual O&M costs, the average fare for passengers will be less with the HSST. Conversely, increasing the percentage from the fare revenues—based on use of the HSST—to equal what would have been required with an SWSR system would reduce the transit subsidy. It should be noted that City O&M estimates seem to have increased considerably from earlier figures. The City’s “Honolulu Rail Transit” brochure distributed throughout the (voting) community in 2008 indicated O&M at “about \$60 million per year in today’s dollars.” Table 6-3 shows the following: for Salt Lake routing - \$63 million in 2007, \$123 million in YOE; for Airport routing - \$68 million in 2007, \$133 million in YOE; and for a combined Airport and Salt Lake alignment - \$96 million in 2007, \$187 million in YOE. HSST O&M is estimated between 20 and 30 percent less per year than SWSR; using 25 percent as an average, its advantage is as follows: for Salt Lake routing - \$47.25 million in 2007, \$92.25 million in YOE; for Airport routing - \$51 million in 2007, \$99.75 million in YOE; and for a combined Airport and Salt Lake alignment - \$72 million in 2007, \$140.25 million in YOE. Using YOE dollars for the now-selected Airport routing, 30-year savings with the HSST would be \$997.5 million. If a dual Airport and Salt Lake alignment materializes, use of the HSST would save \$1.4025 billion. O&M costs savings alone would enable guideway extension into Central O’ahu, a major ridership area.
- 6-11 System Operation Project costs based on train operators
 Perhaps all project costs should be recalculated based on fully automated train operations. No modern train system should be considered that requires train operators; there are enough necessary expenses, so the unnecessary expenses should be eliminated up front. Train operators in a grade-separated urban rail transit system are redundant in the 21st Century.
- 7-11 Important Trade-offs Last paragraph
 Needs to be rewritten, based on City Council action on the alignment.
- 541 Appendix C Construction Process
 This appendix needs to be rewritten to include construction processes for the non-SWSR fixed-rail systems.
- 596 Comment Sheet From Hawaii Department of Transportation (DOT)
 I strongly support DOT Comment Number 2 that elimination due to proprietary technology is not sufficient reason to eliminate alternatives to SWSR systems.
- 1045 D.R. Horton Schuler Comments on scoping meetings.
 The comment that “...Maglev systems are not only extravagantly expensive and untested in real-world public transit operational settings.” is incorrect. Perhaps Mike Jones was referring to the high-speed mag-lev. The HSST urban mag-lev, compared to SWSR systems, is not only less expensive to build but also less expensive to operate and maintain. It also has been thoroughly tested in revenue service in Nagoya, Japan for almost four years. Renderings of the proposed Ho’opili development in

West O'ahu show a train station inside a public (retail?) building. This is possible with the quiet mag-lev, but I would not recommend it for any SWSR system. Mr. Jones should reconsider his earlier comment.

1160 Frank Genadio Start of my comments during scoping meetings.
 I see nothing in these comments, covering the next three pages, that is contradictory to my current position on each subject. I see that at least a couple of state legislators recently brought up the issue of possibly taking a look at nuclear power. It is about time, and all forms of alternative energy should be "on the table" for powering the transit system.

1494 Fixed Guideway Alternatives "Comments on reducing the range of technologies under consideration are encouraged."
 Seeing this statement again, after reading through the comments in the scoping meetings, makes one believe that the City really had little interest in public input. Despite the supposed restriction on not expressing preferences, I noticed that a number of people mentioned technology and advocated monorail and mag-lev—but there was not much mention of SWSR systems. Several people stressed limiting system noise. I even noticed (early) preference for monorail or mag-lev from a couple of people who seem to have changed their minds later, probably to keep their jobs (i.e., after the City administration decided that SWSR is the system of choice). If public comments are really to be considered in making transit decisions, why is it not even possible for the non-SWSR systems to compete?

1502 Project Alternatives Analysis Report "No information was received that would eliminate one or more of the transit technologies currently under consideration."
 The statement above, in a report dated May 30, 2007, followed City policy throughout the years of 2005-2007. Within the first two months of 2008, this policy disappeared as the City pressed for selection of a SWSR system, even including the "charade" of the (so-called) expert panel of four steel wheels advocates.

1571 Transit Advisory Task Force "...structure for the fixed guideway would be only 26 feet wide,..."
 Two points to note from the guideway width given as 26 feet in this paper: 1) The EIS graphic mentioned above indicates an SWSR guideway of at least 28 feet; and 2) The guideway for the HSST mag-lev would be only 21 feet wide—including open space between the beams. (NOTE: I have no information for conventional monorail; presumably, its guideway also would be narrower than the steel wheels bridge.)

1571 Transit Advisory Task Force Costs for the guideway
 Apparently, the task force received data from the city to determine costs for extensions of the system. These costs are obviously based on SWSR systems—and are considerably higher than what would be needed for the HSST mag-lev guideway. Since the date of this report is December 11, 2006, why did this task force only show costs for SWSR, or why did DTS provide only such data?

1715 Transit Scoping Meeting Comments My personal comments

Pages 1715 (A210)-1718 (A213) are comments I made on the scoping meetings. At that time, I was fully supportive of the City's transit project and fully expected to see a fair and open competition among all forms of fixed-rail. Other than my disappointment at the City's (apparent) refusal to open the competition—with closing it obviously making my advocacy for the mag-lev irrelevant—I see nothing that I would wish to change in my comments. With added park-and-ride lot surface, the amount of solar power generated can be even greater than stated in these older comments.

App. E City Correspondence

Letters to those who commented.

The City's standard response in letters to those who commented on technology during the scoping process states the following: "Vehicle and system technologies will not be selected prior to the draft Environmental Impact Statement. Comments about issues related to vehicle and system technologies will be considered when specifications are developed." Each of these letters was signed by Melvin N. Kaku, Director (at that time) of the Department of Transportation Services. In effect, the City has contradicted its own statements made in 2006 by eliminating non-SWSR system technologies long before publication of the draft EIS. If this does not violate the letter of FTA guidelines, it certainly violates the spirit. Basically, the City deferred any discussion relative to technology through 2007 as being too early for analysis. It then quickly convened an uncalled for (so-called) expert panel, which selected SWSR as the technology in a week that included only two public meetings, and then treated SWSR as the only technology to be considered—even though it never received more than four positive (of nine possible) votes in any meeting of the Honolulu City Council. The whole process has been tainted by maneuvering and insincerity by the City administration—and must be re-accomplished.



January 29, 2009

Mr. Wayne Y. Yoshioka, Director
Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, Hawai'i 96813

**Draft Environmental Impact Statement, Honolulu High-Capacity Transit Corridor
Project, Island of O'ahu**

Dear Mr. Yoshioka,

Thank you for the opportunity to review and comment on the above document. Ford Island Properties LLC ("FIP") presently controls several properties in the `Ewa District that likely will be impacted by the proposed transit corridor project. FIP leases from the United States Navy the 400 acre residential area along the `Ewa coastline known as the Waterfront at Pu'uloa (formerly the Iroquois Point Naval Housing area), which contains 1, 461 single-family and townhome residential dwellings. In addition, FIP recently negotiated the lease of approximately 498 acres of property situated along Roosevelt Avenue within Kalaeloa (formerly known as Naval Air Station Barbers Point). FIP owns an additional 53 acres of land in Kalaeloa, adjacent to the abovementioned 498 acres. In total FIP controls ±550 acres of land in Kalaeloa. FIP's Kalaeloa properties currently comprise a mix of vacant land, occupied buildings and older vacant buildings. FIP acquired its leasehold interest in the Kalaeloa lands for their potential for redevelopment to higher and better uses.

As a landowner/lessee with a significant property interest in the `Ewa region, we offer the following comments.

1. We note that the Draft EIS identifies the preferred alternative as a transit corridor extending from East Kapolei to the University of Hawai'i at Manoa. However, Figure 2-5 indicates a planned extension of the transit corridor linking the proposed East Kapolei Transit Station to an eventual transit station in West Kapolei near Kalaeloa Boulevard. Figure 2-5 depicts the alignment of the planned extension in a manner that is generally consistent with the transit route alignment depicted in the aforementioned Kalaeloa Master Plan. We note that the proposed planned extension through Kalaeloa, as shown in the current Draft EIS, could impact the development potential of approximately ten (10) parcels of FIP's lands in Kalaeloa. As such, while we recognize that the planned extension is beyond the scope of the Draft EIS, we respectfully request that FIP be included in any discussions concerning the eventual implementation of the planned extension as it may have a significant impact upon FIP's Kalaeloa properties.
2. As a landowner and lessee in the Kalaeloa area, we wish to point out that Kalaeloa will eventually emerge as a significant development area in the `Ewa region, and as such, should be referenced and acknowledged in transit planning. While the text on page 2-14

Mr. Wayne Y. Yoshioka
Page 2 of 2
January 29, 2009

acknowledges that the proposed East Kapolei transit station will serve local and express transit commuters from `Ewa, `Ewa Beach, Kapolei and Kalaeloa, we note a general omission and/or inaccuracy among the figures in the Draft EIS with regard to its references to Kalaeloa. Figure 1-3 includes the labels "Kapolei, Kalaeloa, `Ewa, and Ewa Beach. Figure 1-4, entitled Major Activity Centers, identifies "Kalaeloa Industrial Park" as site number 5 and locates it roughly in the area where Fort Barrette Road enters Kalaeloa and intersects with Roosevelt Avenue and Saratoga Road. However, we are not aware of any existing or planned development called the Kalaeloa Industrial Park in this region. Figures 1-5, 1-6, 2-5, 4-14 and 4-39 only reference Kapolei and `Ewa. Figure 2-38 references Kapolei, East Kapolei, `Ewa and `Ewa Beach. Figure 3-7 references Kapolei and Ewa. Figure 4-2, which identifies land uses in the region, depicts no industrial land use in the location of the Kalaeloa Industrial Park identified in Figure 1-4. Figure 4-3 only references East Kapolei. Figure 4-43 references Kapolei, `Ewa, and `Ewa Beach. We request that the various figures be corrected to accurately and uniformly reference major place names in the `Ewa region, including Kalaeloa.

Again, thank you for the opportunity to comment on the Draft EIS. We look forward to receiving a copy of the Final EIS upon its completion. Should you have any questions regarding our comments, please contact me at (808) 585-7900.

Very truly yours,
Ford Island Properties, LLC



Steve Colón
Vice President

Cc: Mr. Ted Matley
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RUSSELL H. TAKARA, P.E.
ACTING DIRECTOR

DEPUTY DIRECTOR

January 23, 2009

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TRANSPORTATION SERVICES

MEMORANDUM

TO: WAYNE Y. YOSHIOKA, ACTING DIRECTOR
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: *Russell H. Takara*
RUSSELL H. TAKARA, P.E., ACTING DIRECTOR

SUBJECT: HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT DRAFT ENVIRONMENTAL IMPACT STATEMENT/SECTION 4(F) EVALUATION

Thank you for giving us the opportunity to comment on the above Draft Environmental Impact Statement.

The Department of Design and Construction has additional comments as follows:

- At several places in the text of the DEIS there are references to Mother Waldron Park. For clarification, Mother Waldron *Neighborhood* Park includes both State- and City-owned lands, but is City-operated, and is the park's officially recognized name. The comfort station and other Art Deco-themed structures in this park are on the State Register of Historic Places. We would appreciate you making appropriate corrections and clarifications where needed.
- We suggest consideration be given to locating the proposed future McCully transit station to the *Diamond Head side* of the McCully Street-Kapi'olani Boulevard intersection. There is a unique opportunity at this location that land acquired to provide access to the transit station may also be secondarily used to serve the Ala Wai Community Park's users, as well as student, faculty, and staff of Tokai University. This would serve to locate the transit station more equi-distant between the Convention Center and Date Street transit stations and be more advantageous in general to the public, in our opinion. We also believe this station location would be more in line with the project objective stated in Section 4.4 of the DEIS of sharing benefits with other community services and government-owned facilities.

Wayne Y. Yoshioka, Acting Director
Page 2
January 23, 2009

Should you have any questions, please call Clifford Lau, Chief, Facilities Division,
at 768-8483.

RHT:lt (287692)

c: DDC Facilities Division

**Comments on DEIS Chapter 4.9 (Noise and Vibration) and Technical Report RTD 2008f
(Honolulu High-Capacity Transit Corridor Project Noise and Vibration Technical Report)**

Ronald Darby, P.E.
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1/22/09

A. Additional information and comments related to determining noise impact in my first submittal, reference 1.

Reference 2 states *"For residential land use, the noise criteria are to be applied outside the building locations at noise-sensitive areas with frequent human use including outdoor patios, decks, pools, and play areas. If none, the criteria should be applied near building doors and windows. However, for locations where land use activity is solely indoors, noise impact may be less significant if the outdoor-to-indoor reduction is greater than for typical buildings (about 25 dB with windows closed). Thus, if the project sponsor can demonstrate indoor activity only, mitigation may not be needed"*.

However, in Hawaii many residential buildings were built for natural ventilation only, often using operable glass jalousies and open sliding glass doors to enjoy our tradewinds. Table 7: "Building Noise Reduction Factors" of reference 3 shows the outdoor-to-indoor noise reduction of open windows to be 10 dBA and includes: "NOTE: The windows shall be considered open unless there is firm knowledge that the windows are in fact kept closed almost every day of the year."

Even when a window air-conditioner is used with the jalousies closed, the outdoor-to-indoor noise reduction is less than 20 dBA depending largely on the degree of air-tightness that can be achieved.

In order to illustrate the impact of traffic and transit noise on the interior of Hawaiian homes along busy roadways that may have transit guideways, I have modified Figure 3-1 from reference 2. See attachment. It contains the standard plot for measured noise levels obtained at exterior locations near buildings as well as interior noise levels assuming an outdoor-to-indoor noise reduction of 20 dBA for random buildings as circles and the same buildings as asterisks if the noise reduction was only 10 dBA, e.g. open windows.

It can readily be seen that many of the buildings cited in Appendix A of reference 4 that are now considered "No Impact" or "Moderate Impact" should be "Moderate Impact" or "Severe Impact" if open windows are acknowledged.

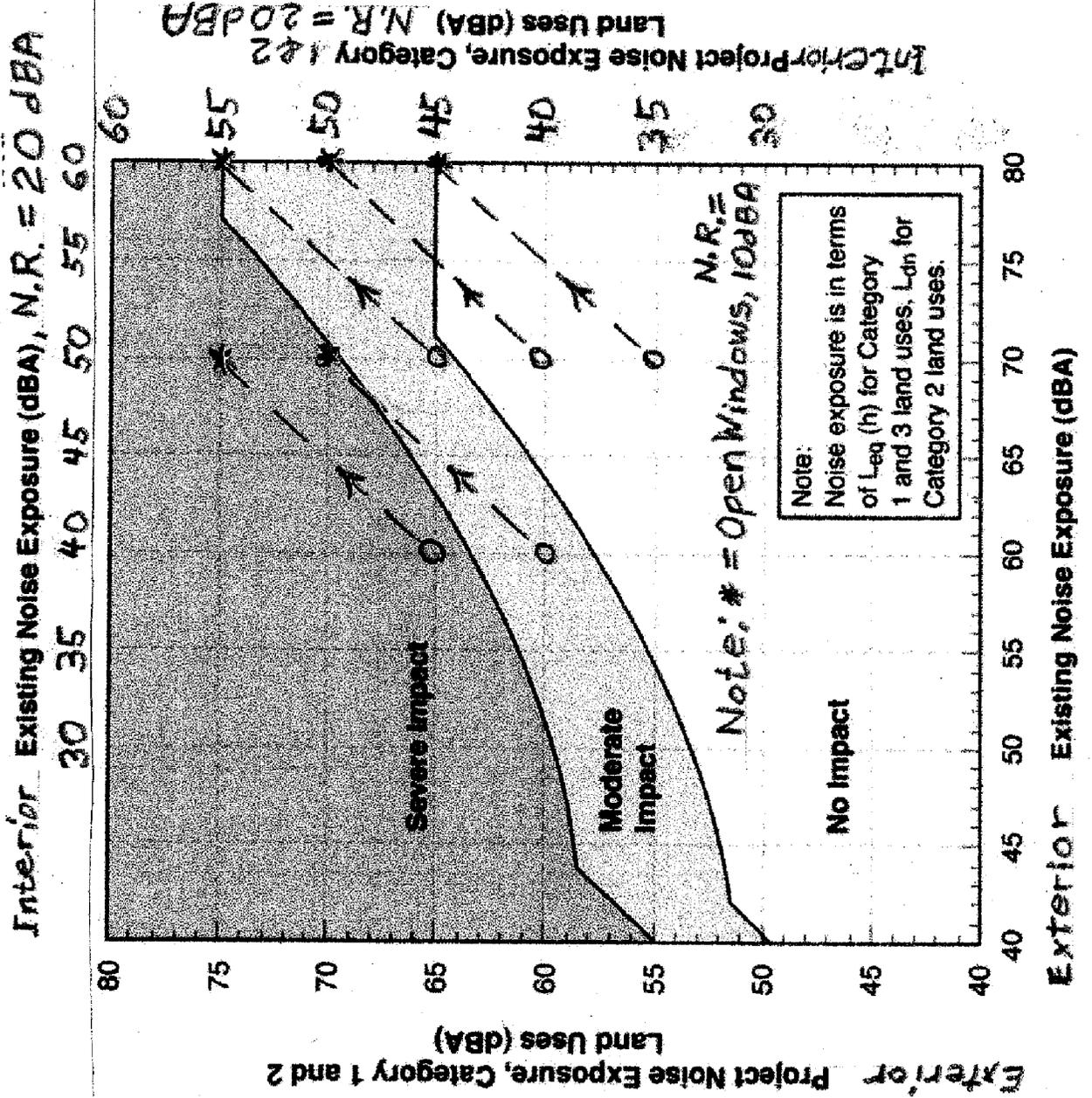
The DEIS should refine the concept of the modified Figure 3-1 or create some other means to account for the diversity of fenestration found in Hawaiian buildings and factor it into the "Projected Project Noise Exposure Levels" in Appendix A in reference 4.

reference 1- 'Comments on "Honolulu High-Capacity Corridor Project Draft Environmental Impact Statement', 1/13/09 - Ron Darby

reference 2- "Transit Noise and Vibration Impact Assessment", FTA-VA-90-1003-06, May 2006

reference 3- HIGHWAY TRAFFIC NOISE ANALYSIS AND ABATEMENT POLICY AND GUIDANCE, U.S. Department of Transportation, Federal Highway Administration, Office of Environment and Planning, , Noise and Air Quality Branch, Washington, D.C., June 1995

reference 4- "Noise and Vibration Technical Report Honolulu High Capacity Corridor Project", C/C Honolulu, Oct. 1 2008



Modified Figure 3-1. Noise Impact Criteria for Transit Projects

297251

Shirley Hasenyager
235 Kuuhoa Place
Kailua, HI 96734-2734
shirleyinhi@aol.com
(808) 262-5069

January 27, 2009

Mr. Wayne Yoshioka
Director, Dept. of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu HI 96813

Dear Mr. Yoshioka:

I have numerous concerns about the DEIS for the Honolulu City and County's proposed heavy rail transit system. A few of them are:

1. I do not feel the issue of property acquisition and adequate reimbursement has been fully addressed. What about loss of business during relocation and construction and decreased value already occurring due to anticipation of acquisition and/or lengthy disruption ?
2. The immense adverse visual impact to Honolulu has been minimized and not adequately described. We need to have good, easily understood descriptions of the many stations planned as they will impact a large area that includes schools, homes and businesses. The size of these stations needs to be explained in detail.....the footprint of the station, height and amount of land surrounding each one needed for parking, bus accommodation, etc. How are they to be protected from vandalism, graffiti, and criminal activity?
3. What happens when we have a power outage like the one during a recent storm. This is not something speculative. **This will happen.** How do you propose getting people off of the trains and out of the stations?
4. What accommodation is there for luggage (assuming an airport route) and other large items people will need to be able to carry on a train, either to a place of work or back to their cars after shopping.

There simply has not been an **honest** presentation of the impact of the proposed rail system on businesses and residences on the route, nor the disruption of traffic during a very lengthy construction period. What recourse does a resident of an apartment have when he finds he has a noisy train running in front of his lanai every few minutes, blocking his view, ruining his life and making his apartment worth zero? Is the city prepared to deal with the many law suits that are inevitable?

Yours truly,



cc: Mr. Ted Matley
cc: Gov. Linda Lingle
cc: Honolulu City Council

CHIEF OF OFFICE
DEPT. OF
TRANSPORTATION SERVICES

09 JAN 28 PM 12:36

RECEIVED

1127 Wanaka St. Honolulu, HI 96818

December 9, 2008

Honolulu Hale
530 S. King Street Honolulu, HI 96813

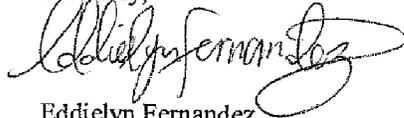
Dear Mufi Hannemann,

The rail system may reduce traffic in the future, and may allow it to build high-density, affordable homes so the children and grandchildren will have a place to live within walking distance of a rail stop, but if you think about it, it is going to cost the Oahu people a whole lot of money.

The city will have to figure out where to get the millions of dollars it will cost to maintain the system. It looks like we're going to pay a lot more in excise and property taxes. The number of people using the system will be minimal. We're going spend billions of taxpayer dollars on a system that will be used by only a small part of the population. Traffic will still be bad and we'll all have to deal with worse traffic while they build the system. Another thing is public has until January 7th for a 400 pages report which is approximately one month from now. There are two big holidays coming up, even the most prepared would find responding thoughtfully a severe burden. With these busy events coming up, it would make the traffic worst.

I do hope that you would understand my opinion. The rail is a great system that would make our life easier but it's just really not necessary for system that's taking more space in Oahu that a small part of population will be using. I would like to here what you have to say so please write back.

Sincerely,



Eddielyn Fernandez

Student of Moanalua High School

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 523-4587
Web site: www.honolulu.gov

MUFI HANNEMANN
MAYOR



RUSSELL H. TAKARA, P.E.
ACTING DIRECTOR

DEPUTY DIRECTOR

CDA 09-296066

January 22, 2009

MEMORANDUM

TO: WAYNE Y. YOSHIOKA, DIRECTOR
DEPARTMENT OF TRANSPORTATION SERVICES
Russell H. Takara

FROM: RUSSELL H. TAKARA, P.E., ACTING DIRECTOR
DEPARTMENT OF DESIGN AND CONSTRUCTION

SUBJECT: HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT
DRAFT ENVIRONMENTAL IMPACT STATEMENT COMMENTS

RECEIVED
09 JAN 23 9:07
DIRECTOR'S OFFICE
DEPT. OF SERVICES
TRANSPORTATION

Thank you for the opportunity to review and comment on the Draft Environmental Impact Statement (DEIS) for the Honolulu High-Capacity Transit Corridor Project. We wish to provide the following comments regarding the design and construction of the guideway structure and appurtenances within the road right-of-way:

1. The DEIS has provided only limited discussion of the placement of the support columns and associated foundations for the elevated guideway structure and transit stations in relation to its impact to the existing utilities within the road right-of-way. In our experience in doing roadway projects, relocation of utilities has been a challenge because of the sheer number of existing utilities and the limited available space below the roadway pavement within the public right-of-way. These relocations would impact the construction related effect on traffic, and should be included in the discussion of Section 3.5.3, Construction-related Effects on Traffic, on page 3-46 of the DEIS, and also addressed in Section 3.5.7, Mitigation of Construction-related Effects, Maintenance of Traffic Plan, on page 3-48, including Table 3-26, Potential Peak-Period Temporary Lane Closures During Construction. In addition, with the aging existing infrastructure, oftentimes the construction activities, coupled with heavy equipment traversing over the construction area, has resulted in existing utilities breaking. In consideration of this, the project should consider the reconstruction of the roadway sections where the guideway support columns and station foundations are located within the City streets, and also the replacement of the appropriate utilities, so that it will not be necessary to come back in soon after with another road rehabilitation project that will involve additional cost and disruption to the traveling public and residents in the area.

Wayne Y. Yoshioka
Page 2
January 22, 2009

2. The estimated cost for the utility relocations is not included as a separate item in the buildup of the transit system costs. What is this estimated amount, and how will the project proceed with the utility agreements with the various utility companies and agencies for the cost share for these relocations?

As the project moves forward, we would appreciate the close coordination by your project staff for transit project's design elements that may impact our department's CIP programs. If there are any questions, you may contact me at 768-8481.

MC/SK:ct (287692)

3003 Ala Napuaa Pl. #409
Honolulu, HI 96818

November 25, 2008

Honolulu Hale
530 S. King Street
Honolulu, HI 96813

Dear Mayor Mufi Hannemann,

I am writing to enquire you about the Rail Transit. I am afraid that I do not support this topic. I am aware of the fact that this will cost billions of dollars. I believe that we could use this money for other purposes. This money can be used to help our community's facilities, business, and schools, for our economy is going through a crisis. We should focus more on education to help further our learning of technology, for it is what our future holds.

I oppose the rail transit system for it does not look very nice and it can ruin the beauty of Hawaii, our paradise. It can be dangerous and harmful to our community for, accidents can occurred as of it has happened in the past, loud construction work will be an annoyance since there are houses and business taking place and it will take many years to plan and build. Some people do not support the idea because taxes will be raised and some do not have any need for the rail transit. Gas prices are decreasing and it would be more convenient to drive a car to get to places faster than to use the rail transit, waiting to get to your destination. The cost of the transit is high priced using our tax money, yet that's only to build it. After it is built, we would have to pay a fee to ride it which I'm afraid might be costly for Hawaii residents. The bus system is inexpensive and works perfectly fine and the same as if the rail transit would be used. In the end, this involves having too many technological and financial problems.

I am enclosing this and I hope that you can reconsider this thought. I appreciate your time being, Thank you and mahalo again for reading this.

Yours Sincerely,



Crysta Okabe
(student)

RT 1/09-297328

1/26/09

DTS
RAPID TRANSIT

Re: Rail System

I've had ^{many} questions regarding the rail system. Whenever I've heard Mafi speak about this system, he's never addressed my concerns and articles in the newspapers haven't either.

Finally, some of my concerns have been addressed in the brochure "Honolulu on the Move". I now know it does run on electricity + plans of what to do if we have power outages. Prolonged outages were also addressed.

However, if that happens, there will be no air conditioning! How will people rest being alone ground when that happens + the train stops between stations? How are you going to get them to safety? There will be senior people, pregnant women (some with children) wheelchair riders not to mention other handicapped riders.

Finally, will there be a security person riding each train in case of incidents? Will there also be security at each station so robberies + attacks of any kind can be handled? Some riders will have to ride early in the
(over)

morning + late in the evening due to their jobs.

These questions have never been answered either in the papers, on television, or in one of Mufi's many appearances!

I was born + raised ^{in Hawaii} in Hawaii + don't drive. I have been a bus rider since I was 5yo old and am now a retired senior citizen of sixty-six. We are lucky to have an excellent bus system, the best in the country!

I will never ride the rail system as the route will not be in the Makiki area. Perhaps my concerns stem from the fact that I am highly claustrophobic. The thought of being trapped above ground with no air-conditioning frightens me. Thank God for this bus system. More people should leave their cars at home + ride The Bus to relieve the traffic mess. Parents now-days indulge their children with a car; I know some families give each child a car on their 16th birthday. What a traffic mess we have on our hands.

More Islanders should use the bus! You can sleep, read, listen to music, do crossword puzzles or just enjoy the ride! I see no many problems happening with the Rail System including money spent during this hard time!! Stephanie D. Ferrando



January 14, 2009

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

Subject: Honolulu High-Capacity Transit Corridor Project

Dear Mr. Matley:

I would like to take this time to thank you and the Federal Transit Administration (FTA) on behalf of the citizens of the City and County of Honolulu for your expertise and diligent oversight of the Honolulu High-Capacity Corridor Project (Rail Project). Your oversight of the development of our Rail Project will assure our citizens that they will be rewarded with a rapid transit system that is fiscally sound, and will meet the needs of the communities now...and in the future...without undue burden given the current economic times, and risks associated with the development of systems of this complexity.

I would also like to convey to you my complete support for a rapid transit system for the City and County of Honolulu that will meet the needs of our citizens...being affordable, beneficial and with less financial risk associated with its development, construction and continued operations and maintenance.

In regards to my support, I have been intimately involved in the Rail Project since its inception with a keen interest in making sure that we follow through with meeting the aforementioned needs (tenets) of our citizens...again, being affordable, beneficial and with mitigated financial risk.

In my review of the Draft Environmental Statement (DEIS), I have several concerns in our ability to meet these tenets and the resulting financial burden that will be placed on our taxpayers. I have voiced my concerns through various means including several editorials (see attachments A, B and C) for your review. And through this letter, I would like to personally bring these concerns to your attention in your oversight capacity. In the end, my concerns can be summarized as fiscal in assuring that the citizens are not burdened with an unaffordable rapid transit system. These concerns are as follows:

1. General Excise Tax (GET) levels are down and would be expected to decline further due to the current economic situation we are experiencing on a global basis. In particular:

- GET collection over the first 20 months was \$246 million. If averaged over 15 years...the total would be about \$2.2 billion, which falls short of the overly-optimistic \$4.1 billion in GET surcharge revenues estimated for in the Draft Environmental Impact Statement (DEIS)
- According to the Presidents Budget for FY2007, stated in the Annual Report of New Starts Proposed Allocation of Funds for Fiscal Year 2007, there are 21 other transportation projects ahead of Honolulu's Rail Transit Project that have applied for Full Funding Grant Agreements (FFGA).

A failure in adequate funding would leave a heavy financial burden on the citizens of the City and County of Honolulu which would only result in additional taxes either through extensions and/or increases in the GET; increase in property taxes; and additional costs incurred through the issuance of bonds to fund the development of the Rail Project.

2. The proposed change from the Salt Lake Boulevard alignment to the Airport alignment appears unjustified and impractical in terms of benefit and costs. For instance:
 - Costs for the airport alignment are reported to add \$220 million more to the total price of the Rail Project, with an additional \$75 million to double-deck the platform and guideway at the Lagoon Drive Station. This is above the much more practical and affordable Salt Lake Boulevard route.
 - The 20-mile long Minimum Operable Segment (MOS) from East Kapolei to Ala Moana Center via Salt Lake Boulevard was approved by the Honolulu City Council in February 2007. Two days after the rail ballot initiative was approved in the November 2008 General Election, a move to switch the route from Salt Lake Boulevard to the airport was proposed, leaving a bitter taste in the mouths of those who voted for rail believing the line would run through Salt Lake Boulevard.
 - The proposed airport rail station appears to be too far from the passenger terminal, making it difficult, if not impractical, for visitors to use—especially with no connection into Waikiki.
 - The costs for operation and maintenance of the airport alignment over the Salt Lake Boulevard alignment would be higher and pose an additional burden to the taxpayers, especially if the first segment is built from East Kapolei to Waipahu.

The change to the Airport alignment from the Salt Lake Boulevard alignment for the near-term does not appear to be fiscally prudent, nor does it provide the benefit to the community and citizens.

3. The Draft EIS lists the airport alignment's daily ridership as 95,310, compared to a ridership of 87,570 by 2030 for Salt Lake Boulevard. The Salt Lake community questions this disparity, particularly since the DEIS does not explain how these numbers were determined.

I am submitting a copy of testimony from Ron Tober, chair of the technology selection panel (*see attachment D*), in response to a series of questions during a recent committee meeting. Based on his comments and expertise, the Salt Lake community and myself further

researched both the airport and Salt Lake Boulevard alignments. Here are several of our findings that question the validity of the airport alignment's 95,310 ridership count:

- Independent research conducted by a member of the Salt Lake Neighborhood Board shows several apparent inconsistencies in the Draft EIS. (*see attachment E*)
- There are about 7 million annual visitors to Hawaii. Seventy-one percent of those passengers go through the Honolulu International Airport, with the remaining 29 percent going to the neighboring islands.
- Asian visitors total approximately 2 million per annum, with the majority being Japanese. They arrive early in the morning and take buses to the hotels as part of the tour package. Check-in times are usually mid- to late-afternoons.
- Of the 21 major cities that launched rail systems since the 1970's, only 7 were connected to the airport (*see attachment F*). Most of the links to airports were built after the rail systems were launched. This is why the airport spur should be built later or concurrently with a spur into Waikiki.
- There are approximately 12,500 civilian employees with free base parking at Hickam and Pearl Harbor combined. Most military personnel either live on, or near, the bases... with very short commute times to their workplace.
- About 727 state and 15,000 private sector employees are at the airport. There are over 7,000 parking stalls at the airport, including the new 1,800 stall parking structure for employees and locals to use.
- Oahu has a population of approximately 900,000 residents, of which 60,000 – 70,000 residents currently live along a 4-mile stretch of Salt Lake Boulevard. These residents represent a solid ridership base and can generate more revenues and therefore less taxpayer subsidy for operation and maintenance costs.
- In comparison, when the Minimum Operable Segment (MOS) is completed and operational by 2018, the airport route's daily ridership estimate of 95,310 and transit-oriented development (TOD) opportunities will not be fully realized until 2030, as projected in the DEIS.
- The Salt Lake Boulevard alignment, with two proposed passenger stations, compared to four for the airport route, meets the Cost Effectiveness Index (CEI). A third station in Mapunapuna, with a 150 acres and one owner, would further increase Salt Lake Boulevard's CEI and ridership level (*see attachment G*).

In comparison, San Francisco International Airport (SFO) has over 34,000 workers, 6 million residents in Bay Area alone and approximately 16 million annual visitors, yet SFO has had difficulty in reaching projected daily ridership of 17,800 on the BART airport extension. Ridership levels are nowhere near what BART officials had hoped and the route is losing money.

The above concerns strictly address the need for fiscal accountability, especially in light of the current economic times we are experiencing... globally, and the impact that this will have on Hawaii's taxpayers. It is important that we take care of our citizens first in providing them the most affordable and beneficial rail transit system.

In view of the aforementioned statements and on behalf of the citizens of the City & County of Honolulu, I request that the FTA, given its oversight and responsibilities in the development of this rapid transit system, conduct a separate ridership analysis independent of the current ridership analysis to validate whether the Airport alignment or the Salt Lake Boulevard alignment should be preferred. Further, the community firmly believes that beginning the project in East Kapolei does not make sense since it will do little to relieve traffic gridlock. To ensure greater ridership and reduce traffic, the first segment should instead begin in Downtown and proceed towards Kapolei. Therefore, this analysis should also address the stationing and proposed sequencing of the work.

I would also request that the FTA look at the delivery approach proposed in segmenting the work, and consider the use of a "Master Contractor" with the experience and capability to undertake the responsibility in accepting in large part the risk associated with the integration of the rapid transit system components. And not allow the City and County of Honolulu and our taxpayers to deal with this risk.

On behalf of taxpayers who will be paying for this project, as well as the many others in the community who voted in favor of rail in the November 2008 election believing that it would pass along Salt Lake Boulevard, thank you for your consideration of the above requests. I look forward to your favorable response to these requests so that our taxpayers can be assured that this project is proceeding in a fiscally-prudent and cost-effective manner.

Please give this matter your immediate attention since it appears a resolution to change the alignment from Salt Lake Boulevard to the airport is pending before the City Council, which will make a final decision on January 28, 2009.

Sincerely,



Romy M. Cachola
Councilmember
District VII

cc: Wayne Yoshioka, Department of Transportation, City and County of Honolulu
Leslie Rogers, Regions Administrator, Region IX, Federal Transit Administration

attachments

RECEIVED
09 JAN 21 A 9:31
REGIONS OFFICE
DEPT. OF
TRANSPORTATION SERVICES

Another View

Salt Lake a better choice than airport for rail route

By Romy M. Cachola

POSTED: 01:30 a.m. HST, Nov 26, 2008

Both Honolulu dailies endorse the airport route for the 20-mile minimum operable segment of the rail project. It is in everyone's best interest to carefully consider the following facts before stepping up to support the route.

» Construction cost. The airport route costs \$220 million more than the Salt Lake Boulevard (SLB) route. We need to avoid the mistakes of other cities and analyze whether funding estimates are what taxpayers can afford. For example, extending Denver's FasTracks, which was estimated in 2002 to cost \$4.7 billion, now costs \$7.9 billion. Denver officials are contemplating raising their sales tax to fund this increase.

» Ridership levels. The Draft Environmental Impact Statement lists 95,310 daily passengers on the train by the year 2030. This means that when the rail line is completed by 2018, ridership and transit-oriented development potential for the airport won't be reached for 12 more years. In comparison, you don't have to wait until 2030 with the SLB route, which would go through the densely populated community of Salt Lake, where there would be a solid ridership from day one.

The estimate of 95,310 daily passengers on the airport route is questionable. There are about 12,500 civilian employees with free parking at Hickam and Pearl Harbor and about 727 state and 15,000 private sector employees at the airport, and more than 7,000 parking stalls at the airport, including the new 1,800-stall parking structure.

These are all disincentives for employees at the airport, Hickam and Pearl Harbor to ride rail.

In comparison, San Francisco International Airport has more than 34,000 workers and higher visitor arrivals than Honolulu, yet SFO has had difficulty reaching a daily projected ridership of only 17,800 on a BART extension. Since the extension opened in 2003, ridership is nowhere near what BART officials had hoped and the route is losing money.

» Operation and maintenance costs. Currently, taxpayers subsidize the TheBus at \$130 million per year. With rail, the O&M cost for both is estimated at more than \$200 million.

When the initial rail segment is built from East Kapolei to Waipahu, who will ride it? This first segment might not relieve traffic since gridlock begins where H-1 and H-2 merge. As you extend the first segment, it will still be "a train to nowhere." With less ridership and farebox revenues, taxpayers will pay more for O&M, which will continue to increase until it reaches downtown.

The above arguments are good reasons to build the first segment from downtown to East Kapolei via SLB; delay the airport route and give the state/city ample time to plan and build a station closer to the passenger terminal; and construct a Waikiki spur.

The advantages of adding a SLB station in Mapunapuna are: 1. the landowner is willing to donate land and help with

<http://www.printthis.clickability.com/pt/ent?action=ent&title=Salt+Lake+a+better+choice+than+airnor...> 1/14/2009

Salt Lake a better choice than airport for rail route - Editorials - Starbulletin.com
station construction costs, and 2. there are better opportunities for affordable housing and transit-oriented development.

The debate between Salt Lake Boulevard and the airport should not pit one community against the rest of the island. This is not a popularity contest but a serious pocketbook issue with billions of dollars at stake.

Other than encouraging commuters to leave their cars at home, a successful rail project shouldn't bankrupt taxpayers' pocketbooks. Simply put, the Salt Lake Boulevard route is cheaper and better than the airport.

Romy M. Cachola represents District 7 (including Mapunapuna, Airport, Hickam, Pearl Harbor, Salt Lake and Foster Village) on the Honolulu City Council.

Find this article at:

http://www.starbulletin.com/editorials/20081126_Salt_Lake_a_better_choice_than_airport_for_rail_route.html

Check the box to include the list of links referenced in the article.

<http://www.printthisclickability.com/nt/cnt?action=cnt&title=Salt+Lake+a+better+choice+than+airport...> 1/14/2009

OPEN FORUM

Salt Lake Route Saves Taxpayers' Money

By Romy M. Cachola

O immediately following the General Election, the Council proposed to change the route of the Honolulu Rail Transit Project from Salt Lake Boulevard to the airport.

The proposal surprised many voters who felt that the change was improper.

The media hinted at a political compromise in the selection of Salt Lake Boulevard for the 20-mile Minimum Operable Segment (MOS) of the rail project. The truth is, for the rail project, leaders in the Salt Lake community and I have not played political games. Instead, we have worked very hard to justify why Salt Lake Boulevard is the better route for the Honolulu Rail Transit Project.

Here are our findings:

Airport

- The rail station is too far away from the passenger terminal, making it a hassle to lug around suitcases. There is also little incentive for visitors to use rail since there is no connection into Waikiki.
- There are over 7 million annual visitors to Hawaii. 71 percent of passenger seats go through Honolulu

International Airport, with the remaining 29 percent going to the neighbor islands.

- Asian visitors, the majority of whom are Japanese, total approximately 2 million. They arrive early in the morning and are taken via buses to briefings or tours before checking in at their hotels in the afternoon.
- Out of 21 major U.S. cities that launched rail systems since the 1970s, only 7 were connected to the airport. Most of the airport spurs were built after the rail systems were launched.

Pearl Harbor/Hickam

- There are approximately 27,000 civilian employees combined at the airport, Pearl Harbor and Hickam with free parking on base.
- Most military personnel live on base or within a short driving distance.

Transit Oriented Development (TOD)/Housing

- The SLB alignment extends through Mapunapuna which encompasses 150 acres and is owned by a single landowner who is willing to donate

(continued on page 6)

OPEN FORUM (CONT.)

from page 3, Salt Lake...)

land and help build a station. Adding a station in Mapunapuna would increase ridership for the SLB alignment and provide greater opportunities for affordable housing and TOD, particularly at:

1. Stadium Mall
2. K-Mart across Stadium Mall
3. Former Costco site
4. Salt Lake Shopping Center
5. Mapunapuna

Operation/Maintenance (O&M) & Construction Costs

- The SLB route is shorter and costs less than the airport route.
- When completed, the initial segment from East Kapolei to Waipahu, will have less ridership and won't relieve traffic gridlock. O&M costs and taxpayer subsidies will be more and will increase until the 20-mile MOS is completed. This will further burden taxpayers' pocketbooks.

Furthermore, we should look at the transit experiences of other cities and hopefully learn from their mistakes.

1. San Francisco's BART was extended to the airport in 2003 with a projected ridership of 17,800. Currently, they are hard pressed to meet projections, despite having 34,000

airport workers and higher visitor arrivals than Honolulu.

2. New York's Metropolitan Transportation Authority has proposed a 23 percent fare hike for the Long Island Rail Road and a 43 percent hike for Long Island Bus fares—a proposal which has angered passengers.
3. Denver's FasTracks transit extension, estimated in 2002 to cost \$4.7 billion, now costs \$7.9 billion. Officials may raise their sales tax to fund this increase.

Based on the above, we should be skeptical of the projected 95,310 riders for the airport route and the estimated \$220 million that will be added to the cost of construction. If the numbers provided in the Draft Environmental Impact Statement don't match, taxpayers will be faced with the following additional funding proposals:

- Extend the half percent GET collection beyond the Year 2022.
- Increase the GET to one percent.
- Borrow money by floating bonds.
- Increase property taxes.
- Raise fares.

We should think first and foremost

of the welfare of our taxpayers and select the route that is less costly and that will attract locals who will ride the rail despite a bad economy.

Leaders and residents of Salt Lake, although upset with the proposed route change immediately after the election and the deletion of \$30 million for SLB widening, have done an outstanding job in defending Salt Lake Boulevard as the better route.

Joseph M. Zobian, M.D.



**Board-certified
ophthalmologist**
U.S. Peace Corps Volunteer,
Philippines
San Marcelino, Zambales
1988 to 1990
Tagalog and Ilokano spoken

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94-307 Farrington Highway, Suite B7a
Waipahu, HI 96797

December 16, 2008

Reduce rail burden on O'ahu's taxpayers

By Romy M. Cachola

A recent article in The Honolulu Advertiser reported that general excise tax collections are down compared with last year's totals because of the bad economy and declining visitor arrivals.

Funding for the city's 20-mile minimum operable segment of rail has always been a major concern for me.

The half-percent GET collection for rail for the first 20 months was \$246 million. If averaged out over the 15 years of collection, the total GET would be about \$2.2 billion, which falls short of the overly optimistic \$4.1 billion in GET surcharge revenues estimated in the draft environmental impact statement.

The following are other reasons for concern:

- With GET levels down, there may not be enough funds collected to build the eight-mile first segment from East Kapolei to Waipahu, which I suspect may cost around \$1 billion.
- The airport alignment, if selected instead of Salt Lake Boulevard, would add \$220 million more to the total price tag, plus an additional \$75 million to double-deck the platform and guideway at the Lagoon Drive station, according to the draft EIS.
- According to the president's budget for fiscal year 2007, as stated in the Annual Report on New Starts Proposed Allocation of Funds for Fiscal Year 2007, there are 21 other transportation projects ahead of Honolulu's rail project that have applied for full funding grant agreements.

I stated early on that we can expect one or more of the following proposals if our construction cost estimates are off:

- Extend the half-percent GET collection beyond 2022, the final year of tax collection.
- Increase the GET to 1 percent.
- Borrow money by floating bonds.
- Increase property taxes.

It seems that the administration's plan to fast-track the first segment of the project using collected GET funds is coupled with the notion that once construction begins there will be no stopping. This may explain why the administration is hinting at floating bonds sooner rather than later to make up for the shortage. If we are forced to borrow money, as I suspect we will be, the debt service will be an added strain on taxpayers.

Instead, I strongly suggest, if at all possible, that the city fast-track its application to secure a FFGA with the Federal Transit Administration before starting construction.

The benefits of an FFGA are that it:

- Defines the project scope.

<http://www.honoluluadvertiser.com/anns/nbcs.dll/article?AID=/20081216/OPINION03/812160314&te...> 1/14/2009

- Establishes a firm date for project completion.
- Provides a mechanism for designating funds for future years.
- Leads to the development of accurate cost estimates.
- Permits the use of state and local funding for early project activities without jeopardizing future federal funding for those activities.

An FFGA will result in better predictability and transparency and hopefully prevent cost overruns and delays of the project. Also, an FFGA will give our taxpayers peace of mind and comfort in knowing that they won't be saddled with the burden of repaying long-term debt through borrowing. We would further save taxpayers' money if the more affordable Salt Lake Boulevard alignment, which has a solid ridership base, is selected.

The City Council and administration need to keep taxpayers' best interests in mind for this multi-billion-dollar project. A successful project is one that will not only encourage commuters to leave their cars at home but also won't bankrupt our taxpayers' pocketbooks.

Romy M. Cachola is the councilman for Council District VII (Salt Lake, Halawa, Mapunapuna). He wrote this commentary for The Advertiser.

Transportation Committee

2.28.08

9 am

Presentation on the Evaluation and Selection Report by the Fixed Guideway Technology & Evaluation Panel.

Councilmember Todd Apo: You mentioned a potential problem with Dillingham and the existing powerlines.

Ron Tober: That's correct.

Apo: So it's integrating an elevated system with existing powerlines?

Tober: I think it can be dealt with. It'll be a challenge for the engineers to come up with a way to do that.

Apo: So has nothing to do with the actual system. It's just a matter of what's there already and how to deal with it?

Tober: Correct.

Apo: the Salt Lake vs. airport route—I've been an advocate to get it back to the airport and Pearl Harbor. One way is to run lines through both of them. The other thing I've thrown out before is to run a line through one side and take a spur to the other side. Given what you've seen from the commercial (airport) and residential (Salt Lake) standpoints, if we look at doing it with a single line and a spur, any opinion on which one would make the most sense?

Tober: Meaning which direction the spur should come from?

Apo: I'm asking whether we should run a line through Salt Lake and take a spur through Pearl Harbor and the airport, or run the line through Pearl Harbor and the airport and take a spur through Salt Lake?

Tober: I think the day-to-day traffic, the potential that you have on Salt Lake, is greater. The airport has times of the day when you have lots of people coming in and when you have some dead periods of time at the airport. That's from my own personal experience. I came in yesterday afternoon at 5 pm and took a 5 pm bus from the airport to the hotel. Very little traffic going on at that point in time. So the daily ridership potential on Salt Lake is probably greater than at the airport. That's based in part on my own experience in running rail transit, which we did in Cleveland. So the spur probably is better taken to the airport. For when you have planes coming in and tourists and workers out there. Probably it's better coming off of the Waikiki-Downtown-Honolulu end of things, rather than the Kapolei end of things.

Apo: Let me throw out a factor that you're not aware of.—the employment factor. If it was just the airport, I'd tend to agree with you pretty easily. But when you throw in the employment factor for Pearl Harbor, which is a major employer in that area, as well as the industrial area around the airport. We'd probably need to show you the numbers. You can do the evaluation. The significant daily peak traffic worker transportation that's needed through there. Would that affect your analysis?

Tober: It probably would. I haven't had many real experiences with Pearl and looking at that area. That very well could be a major factor in terms of where the greatest all-day ridership potential might be. That's something that I'm not aware of right now.

(1:52)

* * *

COMMENTS OF MARK TAYLOR ON
DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR HONOLULU RAIL TRANSIT PROJECT

December 9, 2008

Thank you for the opportunity to submit comments on the Draft EIS for the Honolulu Rail Transit Project. My name is Mark Taylor. I reside in the Salt Lake neighborhood of Honolulu and served from 1993 to 2007 as an elected member of the Aliamānu-Salt Lake-Foster Village Neighborhood Board.

I have three comments on the Draft EIS.

First, the opening paragraph of section 6.4.2 of the Draft EIS (entitled "Project Cash Flow") states that both the "Salt Lake and Airport Alternatives would be financially feasible." Yet this same paragraph states that the Airport Alternative would require \$1.4 billion in Federal funding, and that the FTA "has not been approached to consider the \$1.4 billion for the Airport Alternative."

Given that there is no indication that Federal funding at the \$1.4 billion level will even be considered by the FTA, how can the Draft EIS state conclusively that the Airport Alternative is "financially feasible"? Unless and until the FTA indicates in writing that it is willing to consider providing \$1.4 billion, the EIS should state that the Airport Alternative has not been shown to be financially feasible. To do otherwise is misleading and invites a fiscally imprudent policy decision on the initial transit alignment.

Second, Table 7-2 of the Draft EIS (entitled "Effectiveness of Alternatives in Improving Corridor Mobility") contains figures that appear questionable, if not incorrect.

- The table indicates that Transit Ridership in 2030 will be only 1% higher for the Airport Alternative than for the Salt Lake Alternative. Yet, it also indicates that Transit User Benefits will be 5% higher for the Airport Alternative than for the Salt Lake Alternative. This significant inconsistency should be either corrected or fully explained.
- The Airport Alternative's purported 5% advantage in Transit User Benefits equates to reduced travel time for all transit users of 800,000 hours per year compared to the Salt Lake Alternative. Yet, the Draft EIS indicates the Airport rail route actually takes longer to traverse than the Salt Lake rail route. In fact, assuming half of projected daily rail trips in 2030 include the portion of the system between Aloha Stadium and Middle Street, the Airport Alternative will increase travel time for rail users by over 500,000 hours per year¹. How can the Airport Alternative *decrease* travel time for *all* transit users by 800,000 hours per year when it *increases* travel time for *rail* transit users by 500,000 hours per year? Again, this significant inconsistency should be either corrected or fully explained.

Third, Table 7-7 of the Draft EIS (entitled "Cost-effectiveness of the Build Alternatives") indicates the Salt Lake Alternative is more cost-effective than the Airport Alternative, but only by a small margin. The figures in this table are derived by dividing the cost of the system under each build alternative by the number of hours of Transit User Benefits it produces. Therefore, if in fact there are any revisions to the Transit User Benefits in Table 7-2 in light of the discrepancies identified above, Table 7-7 should also be revised to reflect the impact on the relative cost-effectiveness of each build alternative.

Thank you again for the opportunity to comment.

¹ 90,000 projected daily trips multiplied by 1/2, multiplied by 2 minutes longer per trip, multiplied by 365 days per year, divided by 60 minutes per hour, equals 547,500 hours.

December 7, 2006

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Council Chair Dela Cruz and Councilmembers,

CITY CLERK

HONOLULU, HAWAII

My name is Mark Taylor and I'm a seven-term member and past chair of the Aliamano/Salt Lake/Foster Village Neighborhood Board. I grew up in the Salt Lake area, graduated from Moanalua High School and have owned a home in Salt Lake for the past twelve years.

As you've already heard in prior testimony, our Neighborhood Board has voted unanimously in favor of building a Honolulu rail transit system with an alignment that includes Salt Lake Boulevard. I'm here today to help explain why.

The purpose of rail transit is to move people. According to the City and County of Honolulu's online GIS system, there are about 50,000 people residing within a mile and a half of the Salt Lake transit station location proposed in the City Administration's Alternatives Analysis. In the Board's view, it would make no sense to construct a rail transit system that bypasses such a large concentration of potential riders (and Council constituents).

The major perceived drawback of a Salt Lake Boulevard alignment is that it would bypass Honolulu International Airport. However, this is less of a problem than it may appear, for a simple reason: air travelers carry luggage, and therefore are unlikely to use rail transit to go to and from the airport.

Other cities have realized this. In selecting a transit alignment, the Council should be aware that most transit systems built in the U.S. in the past 35 years DO NOT service the local airport. Of the 21 major mass transit and light rail systems launched in U.S. cities since 1970, only 7 connect directly to the airport (see attached table). And for the 7 that do have airport connections, in all cases the airport was not served when the system opened. On average, the airport connection was established 7 years after the system began operation.

In a couple of instances, Los Angeles and San Jose, the transit line runs fairly close to the airport, and there's a shuttle bus service between the closest transit station and the airport terminal. Such a solution could be adopted in Honolulu if the Council were to opt for a Salt Lake Boulevard transit alignment.

In conclusion, I urge the Council to make rail transit available to local taxpayers living in Salt Lake who have to commute back and forth to work every day, rather than to tourists exiting the airport who will wonder "what's that monorail thing?" as they peer out the window of their taxi or rental car.

This concludes my testimony. Mahalo for your attention.

Misc. Com. No. 1707

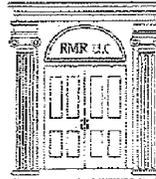
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AIRPORT SERVICE PROVIDED BY U.S. RAPID TRANSIT AND LIGHT RAIL SYSTEMS OPENED SINCE 1970*

City	System	Service Date	Length (miles)	Serves Airport	Comments
Atlanta	MARTA	1979	46	Yes	Connected to airport in 1988
Baltimore	Metro	1983	15	No	
Baltimore	MTA	1992	30	Yes	Connected to airport in 1997
Buffalo	Metro	1985	8	No	
Charlotte	CATS	2007	21 by 2025	No	Airport will be served by separate BRT
Dallas	DART	1996	45	No	Separate commuter rail line to airport
Denver	RTD	1994	35	No	
Houston	Metro	2004	8	No	
Las Vegas	Las Vegas Monorail	2004	4	No	
Los Angeles	Metro	1993	73	No	Shuttle bus from Metro station to airport
Miami	Metro	1984	22	No	
Minneapolis	Hiawatha Line	2004	12	Yes	Connected to airport in late 2004
Pittsburgh	The T	1987	25	No	
Portland	MAX	1986	44	Yes	Connected to airport in 2001
Sacramento	RT	1987	37	No	
Salt Lake City	TRAX	1999	18	No	
San Diego	MTS Trolley	1981	46	No	
San Francisco	BART	1972	104	Yes	Connected to airport in 2003
San Jose	VTA	1987	42	No	Shuttle bus from VTA station to airport
St. Louis	MetroLink	1993	46	Yes	Connected to airport in 1994
Washington D.C.	Metro	1976	106	Yes	Connected to airport in 1977

*Excludes short (typically less than 3 miles) "heritage streetcar lines", e.g. in Little Rock, Memphis, Tampa

Property Management & Leasing
Pacific Guardian Center - Makai Tower
733 Bishop Street, Suite 1620
Honolulu, HI 96813



tel: (808) 599-5800 fax: (808) 599-5806

Reit Management
& Research LLC
PROPERTY MANAGEMENT
DIVISION

Director Wayne Yoshioka
Department of Transportation Services
City and County of Honolulu
650 S. King Street, 3rd Floor
Honolulu, HI 96813

May 5, 2008

Subject: RESOLUTION 08-97 REVISIONS TO THE PUBLIC
INFRASTRUCTURE MAP FOR THE PRIMARY URBAN CENTER
DEVELOPMENT PLAN

Dear Director Yoshioka,

Our company, Reit Management & Research LLC, is property manager for HRPT Properties Trust ("HRPT") and manages 150 acres of land in the Mapunapuna Industrial area that are owned by companies affiliated with HRPT.

The City Council is currently reviewing revisions to the Public Infrastructure Map for the Primary Urban Center for the Honolulu High Capacity Transit Corridor Project. We are requesting that the PIM amendments include a symbol for a transit station at Mapunapuna.

Mapunapuna is already a major job center, and a transit station would be a significant benefit to the thousands of people who work and do business in and around Mapunapuna. A Mapunapuna transit station could also capture ridership from nearby residential communities in Moanalua, Tripler, and eastern Salt Lake. Furthermore, with its proximity to Downtown and its location along the transit corridor between Kapolei and especially urban Honolulu, Mapunapuna has the potential to be redeveloped to include more usable industrial space and other office/commercial and residential land uses. In short, this area has great Transit Oriented Development (TOD) potential.

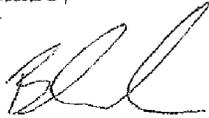
Office Locations:
Albuquerque, NM • Austin, TX • Kansas City, KS • Los Angeles, CA • Minneapolis, MN • Newton, MA • Philadelphia, PA • San Diego, CA • Syracuse, NY • Washington, DC

Redevelopment of this area and an additional transit stop at Mapunapuna will significantly enhance transit ridership along this corridor.

Reit Management and HRPT are willing to assist the City and County of Honolulu to help realize the development of a transit stop at Mapunapuna.

We look forward to working with you. Please don't hesitate to contact me at 599-5800.

Mahalo,



Bradford Leach
Vice President - Pacific Region
Reit Management & Research LLC

Cc: Council Chair Barbara Marshall and all Councilmembers
Mr. Henry Eng, Director DPP

296220

Patricia O. Lohr
1296 Kapiolani Boulevard, #2906
Honolulu, Hawaii 96814
808-593-8510

January 15, 2009

Mr. Wayne Yoshioka
Director, Department of Transportation Services
City and County of Honolulu
650 South King Street, Third Floor
Honolulu, HI 96813

Dear Mr. Yoshioka:

I moved to Hawaii with my disabled husband two years ago and made a sizeable investment in a condominium at 1296 Kapiolani Boulevard. Our unit faces the ocean, one block from Kona Street and Ala Moana Mall. We came to the islands to enjoy its unique beauty and tranquility, but find ourselves located in an area committed to the unsightly and noisy effects of a rail system we vehemently oppose.

I have several reasons to question the advisability of such a plan beyond the negative effects it will have on my personal enjoyment and the property value upon which our economic well-being relies.

I am hoping your response to this inquiry will allay my fears that this project is a mere monument to the current city and county administration and is in the worst interest of the misled citizens and the tourism industry upon which the state's depend so heavily.

First, the promises for tax stability seem without foundation. Even if the Federal Government provides the subsidy you seek, there seems to be no provision for maintenance and repair for the system that will obviously be required. Please address this issue.

Beyond that, there seem to be so many critical needs that have no alternative solutions than financial commitments. The priorities for improved quality of life seem to be skewed in favor of a pet project of the administration at the expense of our abysmal educational system and the rapidly deteriorating infrastructure. I was amazed to see "The Honolulu Advertiser's" headlines admitting that the mayor is willing to fight the Federal Government's assertion that the sewer system is in such desperate need of repair and expansion, it should be

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addressed without delay. The administration apparently is willing to see it deteriorate further, while eagerly devoting billions of dollars on a rail project for which there are reasonable and cost effective alternatives that you refuse to consider.

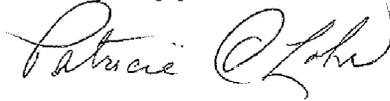
While I'm sure engineering issues are significant, I am clearly not professionally equipped to challenge them. Instead, my specific questions will address the effects on the beauty of the area and effects on the citizens and their livelihoods.

1. Honolulu should not be compared with Washington, D.C., or any other mainland city which has selected a rail system to facilitate its transportation needs. None of them possess the unique historic and cultural issues that exist here in Hawaii. None of these cities professes to be a tropical paradise and advertises itself as such to attract tourists and ensure they will return and recommend Hawaii to others. How can you ensure that the natural beauty of our island is not going to be marred by miles of concrete pillars and noisy rail cars?
2. How will the noise and the elevation of rail cars affect our dwindling bird population?
3. How will rail affect the tourists who come to Hawaii to escape the industrialization of their own areas for the beauty and serenity of the Islands? Or will they simply flock to the other islands abandoning Oahu for its fair share of the state's tourist dollar?
4. Experiencing how natural disasters are addressed here (even a relatively minor thunder storm can result in a 36-hour power outage), how will you ensure that the rail system will be sustained during emergency situations.
5. What will happen to people whose homes and/or businesses will be confiscated? What assistance will be given to people (owners and employees) who must relocate? How will they be compensated in the meantime?
6. Space for expansion to suitable locations is practically non-existent in the city now. How can you ensure there will be no detrimental consequence to businesses?

7. This project succeeded among a small-majority of voters because of the promise to generate jobs. What percentage of the jobs will require specialized skills possessed by rail-professionals and necessarily imported from the mainland?

I will look forward to your response to these questions and whatever other information you can provide to assure Oahu residents that given the economic situation facing Hawaii and the nation, it is appropriate to proceed with this costly and non-essential project.

Very truly yours,



Patricia O. Lohr

cc: Mr. Ted Matley, FTA Region IX

The Honorable Linda Lingle, Governor

City Council Members, Honolulu, HI

Tod K Apo, tapo@honolulu.gov

Donovan M. Dela Cruz, dmdelacruz@honolulu.gov

Barbara Marshall, bmarshall@honolulu.gov

Charles K. Djou, cdjou@honolulu.gov

Duke Bainum, dbainum@honolulu.gov

Rod Tam, rtam@honolulu.gov

Romy M Cachola, rcachola@honolulu.gov

Gary H Okino, gokino@honolulu.gov

Nester Garcia, ngarcia@honolulu.gov



DISABILITY AND COMMUNICATION ACCESS BOARD

919 Ala Moana Boulevard, Room 101 • Honolulu, Hawaii 96814
Ph. (808) 586-8121 (V/TDD) • Fax (808) 586-8129

November 24, 2008

The Honorable Wayne Y. Yoshioka
Director
Department of Transportation Services
City and County of Honolulu
650 South King Street
Third Floor
Honolulu, HI 96813

Dear Mr. Yoshioka,

The Disability and Communication Access Board was disappointed that a representative was unable to attend our Board meeting on November 20, 2008 to dialogue with Board members on the issue of accessibility for persons with disabilities in the proposed rail system. We understand that a representative may be able to attend the next Board meeting scheduled January 15, 2009 and we look forward to his or her attendance.

At our November 20, 2008 Board meeting, we used the opportunity to coalesce some of our concerns on accessibility and wish to relay them to you in advance of the January 2009 meeting in the hopes that you or your staff are better prepared to engage in a meaningful dialogue with our Board.

Our Board has strong concerns that the project meet not only the minimum guidelines for accessibility, as required by law, but also be functional, safe, comfortable and usable for people with disabilities. It has been our experience, unfortunately, that many projects consider accessibility to be an afterthought to the conceptual design. Community presentations on the rail system to-date, including visuals and schematic drawings, do not appear to reflect the population of people with disabilities as a consideration in planning and designing the project. For that reason we strongly urge you to include our Board and other people with disabilities in the earliest phases of conceptual design so as not to limit options because a project is too late to change when already in an advanced stage of design.

The following are some of our preliminary concerns:

1. Since the system is elevated, what is planned for vertical access at all stations? What is planned for the entire route from the Park and Ride onto the train itself?
2. How are you planning to incorporate people with disabilities in obtaining feedback?

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TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

The Honorable Wayne Y. Yoshioka
Director
Department of Transportation Services
November 24, 2008
Page 2

3. What access accommodations are planned for people with visual and hearing loss? Most of the time the emphasis is on mobility access only.
4. What is planned for maintenance, especially with elevators? Since the system is elevated, what will happen when the elevators do not work?
5. Will there be standardized criteria for all the stations since it appears that there may be different design consultants working on various stations?

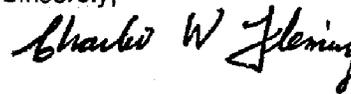
Are you addressing program non-architectural issues as well (i.e., policies regarding assistance animals, emergency egress, audible station announcements, etc.)?

The Disability and Communication Access Board would like to know what information has been learned from other systems (BART in San Francisco, METRO in Washington, D.C.) in terms of access deficiencies and how to avoid them here.

We look forward to your attendance at our January 2009 Board meeting.

Should you have any questions, please feel free to contact Francine Wai, Executive Director at 586-8121.

Sincerely,



CHARLES W. FLEMING
Chairperson

3221 Ala Ilima St. Apt.6

Nov.25 2008

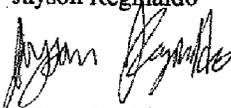
Mr. Mufi Hannemann
Honolulu Hale
530 S. King Street
Honolulu, HI 96813

Dear Mr. Mufi Hannemann

Hi my name is Jayson and I go to Moanalua High School. I am doing a project for a book called Fahrenheit 451, which asks us to identify an issue and take a public stance on it. I chose the public rail transit issue that we have here in Oahu. Our morning and afternoon traffic is a problem here in Oahu, and with the rail it is said to reduce the amount of traffic.

Even though it was agreed to continue on with the project and build the rail transit, there are many people who opposed this decision. I also disagree with the project of building a rail transit here in Oahu. I agree that the transit system would help alleviate the morning and afternoon traffic we have, and the money saving because of the gas prices, but I am skeptical of the amount of people who will actually ride the rail. It was said that the rail will only improve traffic congestion by 3 percent. That is not a big number. You are an excellent mayor of this state, but I believe you are going to fast into this project. First of all, this project is very costly. In 2006 the price was three billion dollars. Now this year it has rose to five. Five billion dollars is a lot of money to spend; why not spend it on our education? With a tax created to pay off the rail transit, it creates more weight on our shoulders financially especially for people who are in bad situations right now. Oahu is a very small island. The rail would make things much more crowded and the fact that businesses and houses will have to move doesn't sound fair. With a transit system here on Oahu, it would ruin the view of Oahu. It would be less considered a paradise. I believe we should stop this project and look more into it.

Maybe this project will help our traffic problem in the future but I am against transit system here on Oahu. There are many reasons why it's a bad idea but it's your decision and I hope you make the right one. Thank you for taking a part of your time to read my letter.

Sincerely,
Jayson Reginaldo

(Moanalua High School Student)

Jayson Reginaldo
3221 Ala Ilima St.
Apt. #6 Honolulu HI
96818

RT 12/08 - 293027

LINDA LINGLE
GOVERNOR



RUSS K. SAITO
COMPTROLLER

BARBARA A. ANNIS
DEPUTY COMPTROLLER

(P)1388.8

STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
P.O. BOX 119, HONOLULU, HAWAII 96810

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

Dear Mr. Yoshioka:

Subject: Honolulu High-Capacity Transit Corridor Project
Draft Environmental Impact Statement (DEIS) / Section 4(f) Evaluation

Thank you for your letters of November 12 and November 25, 2008. The Department of Accounting and General Services remains prepared to work with the Department of Transportation Services but questions the *de minimus* determination you made with regard to the Aloha Stadium (Table 5-1, Pages 5-4, 5-10). Your project, including the park-and-ride, will take approximately 6.2 acres of our Aloha Stadium site. This diminishes our use of the site as a recreation facility, particularly the loss of parking during events. The new offsite park-and-ride parking connected to the Aloha Stadium by this project may not compensate for our on-site parking loss. As a reminder, comments in our September 8, 2008 letter still apply, especially Items 1 thru 5. (See attachment or Pages 95-96 of Appendix D of this DEIS).

If you have any questions, please call me at 586-0400 or have your staff call Mr. Bruce Bennett of the Public Works Division at 586-0491.

Sincerely,

RUSS K. SAITO
State Comptroller

Attachment

- c: Ms. Katherine Puana Kealoha, Esq. DOH-OEQC
- Mr. Ted Matley, FTA Region IX
- Mr. Scott Chan, Aloha Stadium Manager

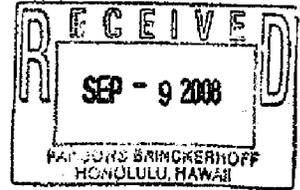
LINDA LINGLE
GOVERNOR



RUSS K. SAITO
COMPTROLLER
BARBARA A. ANNIS
DEPUTY COMPTROLLER
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STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
P.O. BOX 119, HONOLULU, HAWAII 96810

SEP - 8 2008



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

Dear Mr. Yoshioka:

Subject: Honolulu High-Capacity Transit Corridor Project
Participating Agency Project Update

Thank you for your letter of August 18, 2008. The Department of Accounting and General Services, as an update to our letter of March 28, 2008, remains prepared to work with the Department of Transportation Services on two areas of concern. The first is the effect this project may have on Aloha Stadium and the second is its effect on our Liliha Civic Center.

Aloha Stadium

1. We are pleased that the proposed alignment is far less intrusive into the stadium property, as it now more closely follows Salt Lake Boulevard. As stated previously, the State Fair and other events use the parking lot and were transversed by the former alignment. In addition, if there is a need in the future to build a new facility on the property, such as a replacement stadium, the updated alignment would facilitate construction. The impact on the Stadium would be further mitigated if the system ran past the airport, thereby eliminating the need for a traction power station on the stadium property.
2. Disturbance during construction and operation of the transit system, including losses of parking and access, and additional noise, would adversely affect stadium operations and the outlying community.
3. Our need to provide operational security and safety for stadium workers, event attendees, and other event visitors requires that pedestrian walkways be independent of vehicular traffic and that transit station and park and ride facilities be securable daily from stadium, parking, and other ancillary areas.

ATTACHMENT

Mr. Wayne Yoshioka
(P)1296.8
Page 2

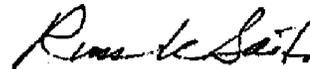
4. The park and ride, transit station, traction power station (proposed for the Salt Lake Boulevard alternative only), and the transit line itself would each eliminate much of our parking without compensation or providing in-kind replacement parking capacity. This would exacerbate the existing shortage of parking during major events. A mutually beneficial solution might be for the City to build a new multi-level parking structure for shared use between park and ride and major stadium event customers.
5. To address traffic congestion and provide the opportunity to increase parking, we suggest that the City eliminate the far west section of Salt Lake Boulevard (SLB) that runs through the Stadium's Kamehameha lot and bus lot. This would create a contiguous lot, and would require the removal of traffic lights at the corners of Essex Road/Main Salt Lake Gate 1 (MSLG 1) and SLB/Kamehameha Highway, and the establishment of two-way traffic on Essex Road. Essex Road and the intersection at Essex Road/Kamehameha Highway would have to be modified to accommodate heavier traffic flow in this area. New ingress/egress options for MSLG 1 and Kamehameha lot would have to be discussed as well.

Liliha Civic Center

There have been no discussions with us about the Liliha Civic Center property that is across King Street from Aala Park. We note that you are now proposing placement of a traction power station near or on this site. We request that it be relocated off-site, and will reserve further comments pending further information, meetings and discussions on this matter.

If you have any questions, please call me at 586-0400 or have your staff call Mr. Bruce Bennett of the Public Works Division at 586-0491.

Sincerely,



RUSS K. SAITO
State Comptroller

c: The Honorable Brennan Morioka, Director, DOT
Mr. Scott Chan, Aloha Stadium Manager
Ms. Stephanie Roberts, PB Americas

Honolulu High-Capacity Transit Corridor Project

Welcome to the Honolulu High-Capacity Transit Corridor Project's Public Hearing for the Draft Environmental Impact Statement/Section 4(f) Evaluation.

This public meeting and hearing has been designed to inform the public about the transit project, explain materials contained in the Draft EIS, answer questions from the public, and collect public input on project issues related to the Draft EIS, Section 106 of the National Historic Preservation Act, Section 4(f) of the U.S. Department of Transportation Act, and floodplains affected by the project.

Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulustransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulustransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: C. Newman Address: 860 Halekuanila #1005
 Phone: 597-1140 Honolulu HI 96813
 E-mail: _____

Comment(s): I personally have been opposed to the rail system as planned.
I feel it detracts from our Islands natural beauty, blocking mountain + ocean views
Perhaps it could utilize our original rail system on the ground of which we have tracks
still remaining in some areas glass & train depot still standing right down town.
Then I discovered the system plans to go down the middle of my narrow street
right in the front of my apartment residence. I am already awoken by our city
garbage pickups 4:00 AM plus in the morning with their tractors whizzing their tanks
beeping which I don't understand as there is no order traffic to signal at that hour.
Why project was Halekuanila St. chosen to go from downtown Honolulu to
Kona St. at the Ala Moana Mall -- wouldn't it make more sense + more scenic
to go down a wider street as Ala Moana Blvd where it could go down the center of
the street not disrupting any residences or businesses, etc or even on the tracks
(over)

side of the street not disturbing as many businesses as well as providing the residents a more scenic ride. (Resides even access to shopping in the future)

Also she likes to point out the cost projected is not realistic in the present day or the accelerating future. Plus there are costs that haven't even been considered as security & so much more.

I pray you will consider these recommendations in future planning.

Thanks for hearing my concerns,

[Signature]

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Return Address

Place
Postage
Here

OTS
RAPID TRANSIT

'08 DEC 26 P 2:07

Department of Transportation Services
Attn: Honolulu High-Capacity Transit Corridor Project
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI, 96813

STAPLE HERE

R7 12/08-292744

Max H. Watson
1777 Ala Moana Blvd., Apt. 1808
Honolulu, HI 96815
December 18, 2008

Dept. of Transportation Services
650 S. King St., 3rd Floor
Honolulu, HI 96813

Dear Dot:

The draft EIS is another step toward bankruptcy. No one has completely explained who is going to pay for this white elephant and how long our great grandchildren will have to pay for but never ride.

Serious budget cuts are now going on. What has happened to common sense?
Bottom line: Billions of tax dollars down a rat hole while our sewer systems deteriorate and other needs await funding. This will be Hawaii's "Big Dig"

Sincerely yours,



Max H. Watson
Tax Payer

Copy to:
The Honorable Linda Lingle
The Honolulu Advertiser
The Star Bulletin
The Honolulu City Council
Pacific Business News

08 DEC 23 P 2:39

DTS
RAPID TRANSIT

292742



Jeremy Lam, M.D.

Kapiolani Medical Center
1319 Punahou Street, Suite 1140
Honolulu, Hawaii 96826
Telephone 944-1844

- Dear Community Leaders,
- I am a Honolulu resident and I am very concerned the following questions have not been properly addressed. I know you folks have your minds set on implementing this expensive project in the face of the deteriorating economy. Please know that many of us do not want you to proceed with the project until all these issues are thoroughly addressed.
- 1. The bus routes will change. What happens to your route? What happens to express buses? 2. Lanes will be taken away, some temporarily for construction and some permanently. Where are those lane closures and what is their duration? Are there traffic rerouting plans? 3. Will there be bike racks on the train and where will they be located? Will bikes be allowed on the train? Will there be a place for surfboards? What about luggage? What about construction workers' tools? Will there be a place for people to put large items they purchase at a big box retailer? What's the size limitation? 4. Will there be washrooms at the stations? How about convenience stores, vending machines? Will the platforms have seats? How many? 5. Under land use, Aloha farms needs to relocate. Is that possible? Where will they go? 6. A relatively simple job of sewer upgrades in Kailua and Kapiolani lead to the loss of businesses and jobs. Are details provided about similar effects during the construction of the rail? 7. Is there a detailed plan for the effect of rail construction on water, sewer, gas and electric utilities? Will there be disruptions of service? Who pays for all these? 8. About \$107 million will be spent on the soft costs of this project. This "paperwork" cost is rather exorbitant for a single 20 mile rail line. How did \$107 million get spent? 9. The DEIS list of preparers for technical content shows that it was done almost exclusively with out-of-Hawaii engineers, planners and specialists. H-3 freeway was designed mostly with Hawaii based engineers. If Hawaii engineers are not able to design rail, who will supervise and build this unfamiliar-to-Oahu infrastructure? 10. Rail construction involves unique skills and certifications that Hawaii construction workers do not have. How will this be addressed? 11. The city has declared that in many cases only a portion of a parcel needs to be condemned and taken away. Can the business survive with the remaining portion? Are they forced to mandatory downsizing and some loss of employment? 12. There are 16 schools that are adjacent to the alignment. Will the overhead structure, the continuous high current exposure and the intermittent noise and vibration affect the learning environment? Is it prudent to relocate the schools? 13. Does rail fit our Hawaiian Sense of Place? How was the impact to tourism and local quality of life by a large elevated structure through town been assessed? 14. Does the DEIS address the impacted vistas and scenery? Are the aesthetics of the structure and each station explained and presented adequately? 15. What will happen in the event of a hurricane? Will the train operate? The train in Houston was shut down for 10 days due to hurricane Ike. 16. BART in the Bay Area uses rail cars made of aluminum to combat corrosion. Is the city's position that corrosion is not an issue? 17. It appears that General Excise Tax surcharge proceeds for rail will be much lower than expected for at least four years in a row. How is this deficit going to be made up? 18. If ridership turns out to be lower than forecast, then what? If the city is forced to provide free train rides like in Puerto Rico, how is the shortfall going to be covered? 19. I heard that the Ala Moana station will now be at a lower elevation, at the west end of Kona Street and not above Nordstrom's. What is the exact plan for the Ala Moana Center station and how is the train going to Waikiki and UH afterwards? 20. Starting construction in Kapolei makes little sense. It may be expeditious and convenient but it is not smart. Why can't a temporary rail yard be established near the airport or Aloha Stadium and build rail east into the city and west out to Kapolei simultaneously?

Sincerely,

Jeremy Lam, MD, 2230 Kamehameha Avenue, Honolulu, HI 96822 12/22/08



DEPARTMENT OF THE NAVY

COMMANDING OFFICER
NAVAL STATION
850 TICONDEROGA ST STE 100
PEARL HARBOR HI 96860-5102

292736
11011
Ser N4/548
17 Dec 08

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

SUBJ: NAVY HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT
PARTICIPATING AGENCY PROJECT UPDATE

Dear Mr. Yoshioka:

Thank you for the opportunity to participate in the review process for this endeavor, and for the project updates, draft Environmental Impact Statement, and preliminary discussions of inter-agency agreement provided by your staff to the Navy on November 14 and 18, 2008.

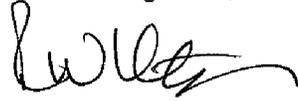
In a separate letter dated November 12, 2008, the Navy raised concerns that the Historic Resources Technical Report for the Honolulu High-Capacity Transit Corridor (HHCTC) Project evaluated Navy property for National Register eligibility without Navy input. This letter provides additional information in response to your letter dated August 18, 2008 requesting Navy's written comments on the project.

The Salt Lake Alignment poses fewer concerns but also offers fewer benefits to the Navy compared to the Airport Alignment. The Navy previously indicated support for the Airport Alignment due to benefits for the Pearl Harbor Navy workforce, family housing areas and historic visitor destinations at Halawa Landing. In either case, careful collaboration to ensure a satisfactory outcome for all parties is needed. Navy's concerns relate to security, noise and traffic impacts (both during and after construction), appearance and the need for adequate transportation spokes between the closest HHCTC station and major Pearl Harbor area work centers, including Pearl Harbor Naval Shipyard which is the largest industrial employer in Hawaii. The enclosed document discusses these concerns in greater detail.

As mandated by the 2005 Base Realignment and Closure legislation, Hickam Air Force Base and Naval Station Pearl Harbor will join to form Joint Base Pearl Harbor Hickam in 2010. As Navy is the lead service for the Joint Base, for planning purposes the issues discussed in the enclosure can be expected to apply to Hickam AFB and related housing areas.

Should you have any questions, please contact my Public Works Officer, CDR Lore Aguayo, at 471-2647 or email maria.aguayo@navy.mil

Warm regards,



R. W. KITCHENS
Captain, U. S. Navy
Commanding Officer
Naval Station Pearl Harbor

Enclosure:

- (1) U. S. Navy Initial Comments for the Honolulu High-Capacity Transit Corridor Project, dtd 24 NOV 08

November 24, 2008

U.S. NAVY INITIAL COMMENTS FOR THE HONOLULU HIGH-CAPACITY
TRANSIT CORRIDOR PROJECT

1. Impacts to Security and Operations

This issue was discussed in the security meeting of July 16, 2008 attended by both U.S. Navy and DTS key players. The Navy cites potential security issues regarding the Airport Alternative as it runs adjacent to Navy property. The location of the Pearl Harbor Station (#32) raises security concerns due to its proximity to the Makalapa Entry Control Point and other high occupancy or critical Navy facilities such as barracks, medical facilities and administration buildings. The location, elevation and design of all stations should incorporate measures to protect Navy property and prevent increased visibility of and access to Navy assets and operations. The Navy is also concerned about potential increases in traffic along Kamehameha Highway at the Pearl Harbor Station and congestion around drop-off zones for this station. Security concerns along the Salt Lake Alternative are noted below under Item 3. Impacts to Navy Housing.

2. Navy Real Property Encroachments

City use of Navy land requires issuance of appropriate real estate documents prior to use of the property. Please provide information on all Navy lands required by the City for the transit project to this office for Navy review. A formal request must be submitted to Navy Region Hawaii for such use at least nine months in advance to enable the processing of the request. Based on the information provided thus far, impacts to Navy property were noted at the locations listed below. In addition, it is our understanding that the project may also encroach upon Navy property along other parts of the transit route outside of the Pearl Harbor main base area.

Salt Lake Alternative

- a. #20, near Lawehana Street
- b. #21, near Radford Drive
- c. #22, near Peltier Avenue

Airport Alternative

- a. Aloha Stadium Station
- b. Arizona Memorial Station
- c. Pearl Harbor Station
- d. Ohana Nui Area

3. Impacts to Navy Housing

Navy housing is currently managed and controlled by Ohana Military Communities, LLC. Any necessary adjustments to property boundaries or real property encroachments

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Enclosure (1)

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should be addressed through formal agreements between City and County and the Navy as discussed above.

In addition, the Navy is concerned about possible visual impacts of an elevated track system, increases in ambient noise levels in adjacent housing areas, and traffic congestion generated by transit stations. In particular, the Navy is concerned about the location of the Ala Liliko'i Station, the potential increase in vehicular traffic on Camp Catlin Drive and the impacts to surrounding housing areas and pedestrian safety. Camp Catlin Drive traverses through three residential areas. When fully developed, Camp Catlin will have 318 homes, Doris Miller Park will have 214 homes and Halsey Terrace will have 477 homes. Although Camp Catlin Drive is primarily a residential secondary street servicing local traffic needs, construction of a light rail station at the north end of Camp Catlin/Arizona Road will likely result in Camp Catlin Drive becoming a primary thoroughfare.

Camp Catlin Drive is a federally-owned road that is an integral part of a security plan negotiated between Ohana Military Communities, LLC and the Department of the Navy. Substantial increases in traffic on Camp Catlin Drive may adversely impact implementation of the security plan and jeopardize the security of the housing residents. Camp Catlin Drive is also a major pedestrian route used by students in the housing area to walk to Aliamanu Elementary and Intermediate Schools. Current vehicular traffic is heavy enough to warrant the provision of a security guard to assist pedestrians across the street. The Navy requests that the City implement appropriate mitigation measures for affected streets and surrounding areas and consider accepting fee title to this roadway.



HOUSE OF REPRESENTATIVES

STATE OF HAWAII
STATE CAPITOL
HONOLULU, HAWAII 96813

Representative James Kunane Tokioka
415 S. Beretania Street Rm. 322
Honolulu, Hawaii 96813

December 16th, 2008

Mr. Wayne Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawai'i 96813

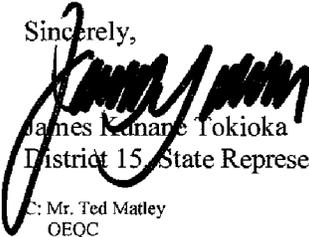
RE: HNL High-Capacity Corridor Project Draft Environmental Impact Statement/Section 4(f) Evaluation

Dear Director Yoshioka,

Thank you for the copy of the draft Environmental Impact Statement on the Honolulu High-Capacity Transit Corridor Project. Upon review I would like to offer the following comment:

As an outer-island legislator, myself and residents from neighboring counties are forced to pay the GET while visiting Oahu. If the City is using the GET tax to fund this project it would only be fair to include a route to the airport so that our outer-island residents can also enjoy the benefits of a transportation system that they helped fund.

Thank you for the opportunity to comment on this project. If you need further information, please contact me at 808-586-6270, or by email at reptokioka@capitol.hawaii.gov.

Sincerely,

James Kunane Tokioka
District 15, State Representative

C: Mr. Ted Matley
OEQC

Representative James Kunane Tokioka
State Capitol, Room 322 • Honolulu, HI 96813
Phone: (808) 586-6270 • Fax: (808) 586-6271
Email: reptokioka@capitol.hawaii.gov

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DIRECTOR OFFICE
DEPT. OF
TRANSPORTATION SERVICES

RT11/08-288504



UNITED STATES DISTRICT COURT

CHAMBERS OF
HELEN GILLMOR
CHIEF UNITED STATES DISTRICT JUDGE

DISTRICT OF HAWAII
300 ALA MOANA BOULEVARD, C-400
HONOLULU, HAWAII 96850-0400

TELEPHONE
(808) 541-3502
FACSIMILE
(808) 541-3579

November 18, 2008

DIS
RAPID TRANSIT
08 NOV 21 P 3:56

Mr. Leslie T. Rogers
Regional Administrator
Federal Transit Administration
FTA Region IX
201 Mission Street
Suite 1650
San Francisco, CA 94105-1839

Re: Honolulu Rail Transit System (Honolulu High -
Capacity Transit Corridor Project, 2008/PIM-1);
Security Risk for Federal Court Building

Dear Mr. Rogers:

The undersigned Judges, being all of the United States Judges of the District of Hawaii, write to strongly voice our opposition to the proposed route of the Honolulu Rail Transit System on Halekauwila Street immediately adjacent to the Federal Court Building. The proposed Halekauwila Street route, or any route similarly close to the Federal Courthouse, raises unacceptable severe security concerns - exposing our Courthouse to potential terrorists' gunfire and/or bombing such as occurred in Oklahoma City and within trains in Madrid, or to a lone attack by an individual holding a grudge against a particular Judge. We understand that you have reviewed the initial draft Environmental Impact Statement submitted by the City and County of Honolulu. We believe there are suitable alternative routes other than Halekauwila Street.

On October 16th of this year we met with the Chief of the Rapid Transit Division of the Dept. of Transportation Services of the City and County of Honolulu, Mr. Kenneth Toru Hamayasu, to express our concern of the high security risk to which the Federal

Courthouse would be exposed should the rail transit system run on Halekauwila Street. He informed us that he did not feel there are any viable alternatives to Halekauwila Street and that any change would be highly unlikely and would require Honolulu City Council approval.^{1/} We disagree that there are no reasonable alternatives.

We believe that Queen Street, King Street, Beretania Street, and possibly other streets could be utilized instead. We recognize, as does Mr. Hamayasu, that any route (including Halekauwila Street) presents problems.

We understand from our discussion with Mr. Hamayasu that the guideway structure will be 45 feet above street level and will pass within a mere 45 feet of the Federal Courthouse building. Our Court building is 4 stories high, so the guideway structure will be at the same level as the windows of three Judges' chambers. The guideway structure will be 25 feet wide, providing 2 sets of tracks for trains proceeding in either direction. There will be approximately 50 trains, with a train passing by our Courthouse during rush hours every 3 minutes in each direction. As noted in the draft Environmental Impact Statement, Halekauwila Street is an unusually narrow street. Moreover, currently there is no public transport system along this street.

Subsequent to our meeting with Mr. Hamayasu, we met with the City's security committee. The security committee presented us with its security analysis entitled "Honolulu Rail Transit Project Potential Threats to Federal Court Building from Transit Viaduct", a copy of which is enclosed. The City's security committee acknowledged that this security analysis was prepared only after our earlier meeting with Mr. Hamayasu, and that previously no consideration had been given to the Federal Courthouse's unique security concerns. It was also noted that neither the U.S. Marshal nor any other federal court security representative was previously consulted or even contacted regarding a proposed transit line running along Halekauwila Street adjacent to the Federal Courthouse. The City's security committee also acknowledged that none of the security specialists who participated in preparing its analysis was familiar with security standards for Federal Courthouses.

^{1/} You may be aware that the City Council is considering initially re-routing the rail transit system to run by the Honolulu Airport rather than the Salt Lake community.

The City's security analysis concludes that "the possibility of an assault from the viaduct to the Courthouse is deemed to be most improbable for many reasons"; yet the analysis fails to effectively address our concerns. As an example, our primary concern is detonation of explosives placed inside a train triggered by a cell phone operated by terrorists from a far distance (similar to what occurred in the Madrid attacks). This could be accomplished in a number of ways; such as, several people carrying sufficient explosives boarding a train several stops before the Federal Courthouse and exiting one or two stops before the Courthouse after leaving the explosives on board, or simply by several suicide bombers. Further, the security enhancements suggested by the City's analysis would afford little, if any, protection from a major bomb blast within a passing train.

After the Oklahoma City bombing and the terrorists attacks of September 11, certain security issues affecting the Federal Courthouse were recognized, and concrete berms and planters were placed along Halekauwila Street to impede trucks with bombs from destroying our Court building as happened in Oklahoma City and Lebanon. A cable secured fence was constructed around the lawn area on the northwest side of the Courthouse, and security patrols were implemented.

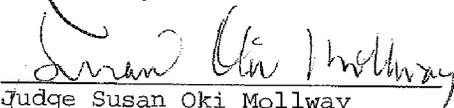
We are still at war with terrorists who want to destroy us - and will be for years to come. Federal buildings have been prime targets.

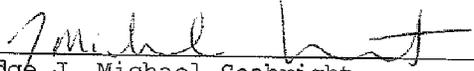
Now the proposed rail transit system on Halekauwila Street would expose the Federal Courthouse to a much greater risk, similar to the train bombings which occurred in Madrid. We urge that you consider this security risk thoroughly, and we request that you require the transit system to utilize a street other than Halekauwila Street.

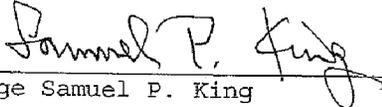
Please do not hesitate to contact us should you have any questions concerning the above.

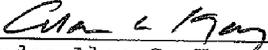
Very truly yours,

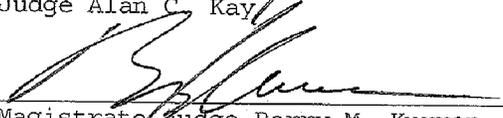

Chief Judge Helen Gillmor

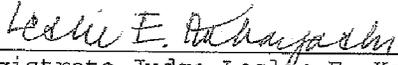

Judge Susan Oki Mollway


Judge J. Michael Seabright


Judge Samuel P. King


Judge Alan C. Kay


Magistrate Judge Barry M. Kurren


Magistrate Judge Leslie E. Kobayashi

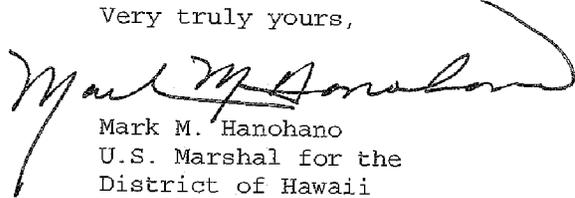

Magistrate Judge Kevin S.C. Chang

Judge David A. Ezra has recused himself from consideration of this issue.

As the U.S. Marshal for the District of Hawaii, I concur with the above assessment of the Judges of this District that the proposed route of the Honolulu Rail Transit System on Halekauwila Street presents a severe security risk to the Federal Court building, and I join in opposing this route.

Dated: November 18, 2008.

Very truly yours,



Mark M. Hanohano
U.S. Marshal for the
District of Hawaii

cc: Kenneth Toru Hayamayu, P.E.
Chief, Rapid Transit Division
Department of Transportation Services
City and County of Honolulu

Ms. Sherry Little
Deputy Administrator
Federal Transit Administration

HONOLULU RAIL TRANSIT PROJECT

Potential Threats to Federal Court Building from Transit Viaduct

The construction of a transit viaduct in close proximity to the court house has been evaluated by security specialists for potential security vulnerabilities. As a result of this evaluation, the possibility of an assault from the viaduct to the court house is deemed to be most improbable for many reasons, including: lack of access to viaduct, easy detection of trespassers, lack of sufficient time to plan an attack, lack of time to carry out an attack, lack of a plausible escape route by a perpetrator, challenge of coordination between train schedules and target availability, and alternatives for accomplishing such an assault which would have significantly less risk of failure.

The evaluation team included a PB Force Protection Specialist with extensive DOD experience, a PB Senior Security Specialist who was a former DHS/TSA executive for Mass Transit and a PB Senior Safety and Security Specialist who was the former DOT/FTA Director of Safety and Security. All of these specialists have conducted numerous vulnerability assessments for transit systems, and maintain high security clearances and liaisons with their prior agencies for current threats, threat trends and security best practices.

Part of the evaluation process was examining similar systems the team is familiar with: the Miami Dade People Mover, Detroit People Mover and Seattle Monorail all travel within close proximity of buildings and in some cases within 50 feet. The Detroit People Mover is adjacent to the federal court house. There have never been any threats or incidents from the People Mover.

The evaluation team contacted the intelligence community regarding this possible threat. Factors considered that would dissuade this type of an assault are: lack the ability of "dry runs", challenged by timing of the target versus train schedules, possibility of being detected (during planning and execution of the attack) and the lack of a good escape method. The team also checked for new or existing current threats that would affect this situation; none were identified.

Significant challenges for anyone attempting an assault from the viaduct include an intrusion detection system protecting entrances to the track area, complemented with CCTVs specifically pointed from platform ends to track area. Trespassers will be detected and a response generated, making it very difficult for a sniper to carry out surveillance or an attack successfully.

Security standards for federal buildings are published by the US General Services Administration. After 9/11, the standards were categorized listed as sensitive security information (SSI) and are no longer available without a specific need to know. The US Protective Services and the US Marshals have access to this information. Judges need to confer with them for any guidance in this matter.

HONOLULU RAIL TRANSIT PROJECT

A requirement in the System Safety Management Plan (SSMP) is the development of a Security Plan for the construction phase of the project. The construction contractor will be required to develop the plan and address security issues such as this one. There are a variety of measures that can be implemented, including security fencing to restrict access to the guideway, lighting to aid in detection, intrusion detection systems, and security patrols.

Though the evaluation team found this threat to be most improbable, the following security enhancements for the courthouse can be taken:

- Obscure the direct line of view from the viaduct. Installing a screening wall along the viaduct in the areas of access where there is a direct line of view to the courthouse will reduce opportunities for surveillance of the building and access to areas where a direct fire event could be launched.
- Window glass film/frame anchoring. Attaching a clear or tinted composite film over the window's glass to resist a direct fire or blast overpressure; also, it keeps the glass panel together as a single unit, thus reducing flying glass shards (Kobar Towers). However, window frames require anchoring to the building structure and a horizontal catch bar should be installed on the inside of the window to 'catch' the glass panel if the frame fails, thus, preventing the glass panel from becoming a missile hazard.
- Relocate the Judges Chambers. Relocating the judges' chambers to an area of the building that has limited or no direct line of view and limited entry, multi-level access controls. Remove any public, external, or internal identification, signs, boards, menu's, entrances, etc that list directions or locations to Chambers.
- Tint Chamber windows. Prevent the public from seeing into the Chambers to determine if they are occupied by applying a reflective film over the windows. This may also provide environmental conditioning savings to the building and prevent ultra-violet damage to office property.



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DEC 23 2008

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

Dear Mr. Yoshioka,

As a cooperating agency for the Honolulu High Capacity Transit Corridor project, we appreciate the opportunity to review both the Administrative Draft Environmental Impact Statement (DEIS) dated 1 August 2008 and the November 2008 public copy. Per our letter to Mr. Leslie Rogers at the Federal Transit Administration dated 28 September 2007, the Coast Guard had identified every impacted waterway but was still determining each waterway's navigability.

This review, as well as associated impacts to navigation resulting from the project, has been completed. Table 4-25 of the DEIS identifies 17 streams within the study corridor. During our review, however, we considered not only the currently planned route (including alternatives), but also all future planned extensions. Doing so added Makakilo Gulch near the proposed Fort Barrette Road Station and Ala Wai Canal near the proposed Convention Center Station. Additionally, we added Kalauao Springs Stream, Aolele Street Ditch and Kahauiki Stream, which are all within the study corridor but not included on table 4-25.

Enclosure (1) details the results of our analysis. Out of the 22 streams reviewed, eight are considered navigable and subject to Coast Guard jurisdiction. However, at the elevated guideway's proposed location over each of these eight streams, no vessels other than canoes, rowboats, rafts and small motorboats would be able to transit the waterway. Therefore, pursuant to 33 CFR 115.70, the Coast Guard grants advance approval to the location and plans for the guideway over the eight streams. The clearances provided as part of the elevated guideway system are considered adequate for meeting the reasonable needs of navigation, and, in fact, are greater than those of the bridges already in place over these streams. Accordingly, Coast Guard bridge permits will not be required for the project. Pursuant to 33 CFR 118.40, the project is also exempted from providing bridge lighting on the guideways over each navigable stream.

This authorization is valid for a period of two years to commence construction. With respect to completion of the guideway over each affected navigable stream, the Coast Guard accepts the project timeline as proposed in figure 2-45 of the DEIS. Should you not adhere to this time frame, you must resubmit documents for Coast Guard review to ensure that conditions have not changed that would preclude the project from meeting the criteria for advance approval. This determination does not relieve you of your responsibility to obtain appropriate permits from any other federal, state or local agency having jurisdiction in this matter.

Because identification of a waterway as an Advance Approval Waterway is not a major federal action for purposes of the NEPA, and is in fact a categorical exclusion, the Coast Guard requests to alter its affiliation with this project from a cooperating agency to a participating agency.

If you have any questions or concerns, please do not hesitate to contact my representative in this matter, LT Doug Jannusch, at (808) 535-3412 or Douglas.A.Jannusch@uscg.mil.

Sincerely,

W. R. MARHOFER
Captain, U. S. Coast Guard
Chief, Prevention Division
By direction

Enclosures: (1) - (25) Coast Guard Waterway Determinations and Photos for Streams Within Study Corridor

Copy: Commandant, Coast Guard Headquarters, Bridge Administration Division (CG-5411)

DIRECTOR'S OFFICE
DEPT. OF TRANSPORTATION SERVICES

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<u>Stream or Waterway</u>	<u>Approximate Location</u>	<u>Estimated Guideway Ht above Strm</u>	<u>Navigability at Guideway Crossing</u>	<u>USCG Determination</u>	<u>Bridge Permit Req'd</u>	<u>Encl. No.</u>
Makakilo Gulch	Fort Barrette Road Station	Unknown	Not Navigable	Not Navigable	No	2
Kalo'i Gulch	Kapolei Parkway & UH West Oahu Stations	Unknown	Not Navigable	Not Navigable	No	3
Honouliuli Stream	Old Fort Weaver Road	52 feet	Not Navigable	Not Navigable	No	4
Ho'ae'ae Stream	West Loch Station	33 feet	Not Navigable	Not Navigable	No	5
Waikele Stream	Waipahu Cultural Gardens	37 feet	Navigable	Advance Approval	No	6
Kapakahi Stream	Waipahu Transit Center	30 feet	Not Navigable	Not Navigable	No	7
Waipahu Canal (Makalena Str)	Waipahu Transit Center	33 feet	Navigable	Advance Approval	No	8
Waiawa Stream	Pearl Highlands Station	82 feet	Not Navigable	Not Navigable	No	9
Pearl City Stream	Waimano Home Road	24 feet	Not Navigable	Not Navigable	No	10
Waiau Stream	East of Kuleana Rd, West of Waimalu Str.	21 feet	Not Navigable	Not Navigable	No	11
Waimalu Stream	Pearlridge Station	23 feet	Navigable	Advance Approval	No	12
Kalauao Springs Str	Pearlridge Station	23 feet	Not Navigable	Not Navigable	No	13
Kalauou Stream	Pearlridge Station	33 feet	Not Navigable	Not Navigable	No	14
Aiea Stream	Aloha Stadium	28 feet	Not Navigable	Not Navigable	No	15
Halawa Stream	Arizona Memorial & Salt Lake	39 & 37 feet	Not Navigable	Not Navigable	No	16 & 17
Aolele Street Ditch	Lagoon Drive Station	28 feet	Not Navigable	Not Navigable	No	18
Moanalua Stream	Nimitz Highway & Pukoloa St.	48 & 27 feet	Navigable	Advance Approval	No	19 & 20
Kahauiki Stream	Pukoloa St.	37 feet	Not Navigable	Not Navigable	No	21
Kalihi Stream	Middle Street Transit Center	43 feet	Navigable	Advance Approval	No	22
Kapalama Canal	Kapalama Station	23 feet	Navigable	Advance Approval	No	23
Nu'uano Stream	Chinatown Station	38 feet	Navigable	Advance Approval	No	24
Ala Wai Canal	Convention Center Station	Unknown	Navigable	Advance Approval	No	25

ENCLOSURE(1)



293180

HOUSE OF REPRESENTATIVES

STATE OF HAWAII
STATE CAPITOL
HONOLULU, HAWAII 96813

December 12, 2008

The Honorable Wayne Y. Yoshioka
Director, Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, HI 96813

Comments on Rail Draft Environmental Impact Statement

Dear Wayne,

We are writing to express our support for allowing bicycles and luggage on the Honolulu rail system. Making provision for bicycles and luggage on rail cars will increase ridership of the new system.

The draft EIS indicates (page 3-35) that accommodation for bicycles on rail cars is being contemplated during off-peak hours. We believe allowing bicycles on rail cars only during off-peak hours would be a mistake. As you know, integrating the various modes of transportation is essential to maximizing the benefits of rail. Prohibiting bicycles during rush hour would discourage the use of bicycles as a commuting vehicle. Some commuters may not wish to leave their bicycles at a station due to fears of theft. Others may need the bicycle to complete their commute once off the train. Either way, in a climate where bicycles can be ridden year-round, we should encourage their use not put up barriers to it.

With regard to luggage, whether the airport route or the Salt Lake route is ultimately chosen, we strongly support allowing luggage on the train including suitcases, backpacks, duffel bags and any other hand-carried containers. While there are important advantages to riding the train, there are disadvantages as well. One disadvantage is that a rider can only bring on what he/she can carry. Putting any further limit on luggage discourages ridership.

Some may argue that allowing suitcases poses a security risk, but a suitcase carried to the checkpoint of an airport poses just as great a threat. It could also be argued that a person weighted down with luggage will impede other passengers. While this is true to an extent, it is outweighed by the fact that every person who rides the train will alleviate traffic congestion.

Mahalo for considering our comments.

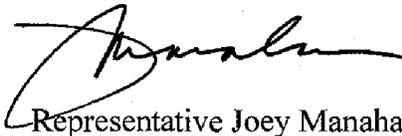
With warmest aloha,



Representative Karl Rhoads
District 28



Representative Karen Awana
District 44



Representative Joey Manahan
District 29



Representative Blake Oshiro
District 33



Representative Marilyn Lee
District 38



Representative Jon Karamatsu
District 41

cc: Mr. Ted Matley, Federal Transit Administration

292893

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843



December 22, 2008

MUFI HANNEMANN, Mayor

RANDALL Y. S. CHUNG, Chairman
SAMUEL T. HATA
ALLY J. PARK
ROBERT K. CUNDIFF
MARC C. TILKER

CRAIG I. NISHIMURA, Ex-Officio
BRENNON T. MORIOKA, Ex-Officio

CLIFFORD P. LUM
Manager and Chief Engineer

DEAN A. NAKANO
Deputy Manager and Chief Engineer

TO: WAYNE Y. YOSHIOKA, DIRECTOR
DEPARTMENT OF TRANSPORTATION SERVICES

FROM:  ~~KEITH S. SHIDA~~, PROGRAM ADMINISTRATOR
CUSTOMER CARE DIVISION

SUBJECT: YOUR LETTER DATED NOVEMBER 12, 2008 ON THE HONOLULU
HIGH-CAPACITY TRANSIT CORRIDOR PROJECT DRAFT
ENVIRONMENTAL IMPACT STATEMENT/SECTION 4 (f) EVALUATION

Thank you for the opportunity to comment on the Honolulu High-Capacity Transit Corridor Project.

The construction drawing should be submitted for approval.

The construction schedule should be coordinated to minimize the impact to existing Board of Water Supply customers.

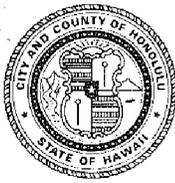
If you have any questions, please contact Robert Chun at 748-5443.

cc: Mr. Ted Matley, FTA Region IX

DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION SERVICES

08 DEC 23 P 2: 54

RECEIVED



CITY COUNCIL

CITY AND COUNTY OF HONOLULU
HONOLULU, HAWAII 96813-3065

290/20

Charles K. Djou
Councilmember, District IV
Chair, Intergovernmental Affairs Committee
Phone: (808) 768-7004 / Facsimile: (808) 768-5011
Email: cdjou@honolulu.gov
Web: www.honolulu.gov/council/d4

RECEIVED
08 DEC 4 A 8 : 15
DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION SERVICES

December 4, 2008

Wayne Yoshioka, Director
Department of Transportation Services
City & County of Honolulu
650 S. King St., 3rd Floor
Honolulu, Hawaii 96813

**RE: DEIS Comments on the Honolulu High Capacity Transit Corridor Project –
(1) Proposed Project Phasing; and
(2) Airport Alternative Route**

Dear Director Yoshioka:

Thank you for allowing me to comment on the Honolulu High Capacity Transit Corridor Project for the Draft Environment Impact Statement (the "DEIS").

I respectfully submit that two changes should be made to the DEIS. First, the proposed construction phasing is not optimal. The first phase of the rail system should be from Aiea to Downtown rather than from East Kapolei to Waipahu. Second, the current Minimum Operating Segment (the "MOS") for the route should go through the airport and Pearl Harbor area rather than Salt Lake Boulevard.

1. The First Phase of the Rail System Should Go from Aiea to Downtown

The DEIS contemplates construction of the Honolulu rail system to be built in four phases, with each phase opening for operation upon completion of construction. (See DEIS, Fig. 2-44). The DEIS has the first phase and operating segment going from East Kapolei to Pearl Highlands, with a proposed complete opening sometime at the end of 2013. The second phase from Peal Highlands to Aloha Stadium is not slated to open to the public until the end of 2016. (See, DEIS, p. 2-20).

Instead of the proposed phasing contained in the DEIS, the first phase of the rail system should go from Aiea (the Aloha Stadium stop) to Downtown Honolulu (the Aloha Tower stop) rather than East Kapolei to Waipahu.

There will simply be insufficient ridership of any rail system to justify opening the initial segment of the rail from East Kapolei to Waipahu. Significantly higher ridership will be garnered for an Aiea to Downtown phase. Garnering a high initial ridership during the first phase of the rail system will provide a more direct benefit to the community and more immediate traffic relief. Such an initial Aiea to Downtown phase can build greater community support, initial enthusiasm and long-term ridership for a Honolulu rail system than a little used East Kapolei to Waipahu phase.

Furthermore, it may take over a decade to construct the entire MOS. There are numerous unknowns that could occur during the construction of the MOS, including a continued economic slowdown that jeopardizes funding or a natural disaster such as a hurricane that could jeopardize construction cost estimates. By constructing the first phase from Aiea to Downtown rather than East Kapolei to Waipahu, the City will insure that even if these contingencies occur, the public will still have a rail system that it can glean significant benefits from. If the City runs out of financial resources or a natural disaster occurs, and all the City is able to construct is an East Kapolei to Waipahu segment, the public will have expended enormous public resources for a rail segment that does not make much practical sense.

An initial maintenance facility can be constructed in the industrial area surrounding the airport for an Aiea to Downtown phase. This should not be a barrier to starting construction of the rail in-town rather than from the West.

In the alternative, if the City must start the construction in Leeward Oahu, the DEIS phasing should be altered to initiate construction at the proposed Waipahu maintenance facility and progress eastward. Such a construction schedule is far more sensible than starting in East Kapolei where there are currently no residents or jobs.

2. Airport/Pearl Harbor Route Should be Selected

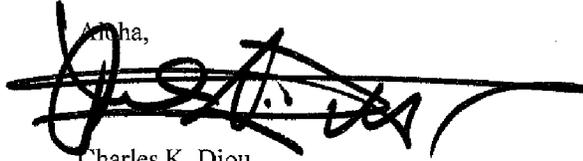
The DEIS examined three possible route configurations, one following Salt Lake Boulevard, one that goes to the Airport and Pearl Harbor and a third that examined both. (See, DEIS, p. 2-19).

The Airport route should be the MOS. This route will yield higher ridership and is far more sensible given Honolulu's demographic conditions. Given Honolulu's main industry is tourism and its second largest industry is defense, connecting the Airport and the Pearl Harbor areas makes much more sense than pursuing the Salt Lake Boulevard alignment. Furthermore, this route was the Locally Preferred Alternative in 1992, the last time Honolulu embarked on the rapid transit project.

Wayne Yoshioka, Director
December 4, 2008
Page 3 of 3

Again, thank you for allowing me to provide comments on the DEIS. Please do not hesitate to contact me if you have any further questions. Best wishes.

Aloha,

A handwritten signature in black ink, appearing to be 'Charles K. Djou', with a long horizontal flourish extending to the right.

Charles K. Djou
Honolulu City Councilmember
District IV (Waikiki, East Honolulu)

CKD:frf

Testimony to Honolulu High-Capacity Transit Corridor Project Public Hearing
Blaisdell Center, Draft EIS, Dec. 8, 2008

I was born and raised in Honolulu and until recently, a 30-year resident of the San Francisco Bay Area.

I feel a great deal of frustration over the rail issue. Having lived in the Bay Area for so long, I understand both the benefits of mass transit and the evils of it. As I rode the BART system to San Francisco from the East Bay suburbs every day, I passed over many decimated neighborhoods, whose vitality and quality of life was destroyed by the BART tracks slicing through communities and businesses.

Like this High-Capacity Transit project, those who pushed for BART did not adequately address serious sociological and economic impacts of the proposed rail system. Instead like Honolulu rail advocates, BART supporters were anxious for federal tax dollars. Or they wanted to rush through the project to make up for year of delay in the past. Then, as now, those motivations are riding roughshod over serious concerns about the rail system's impacts.

One thing is different now, though. We are now faced with billions of dollars of federal deficits, not to mention our own serious economic challenges in the state. There is no way the rail project will NOT meet significant cost overruns and costly delays, even if the federal government meets its promise to provide its share of capital funding – a very iffy promise given the current national economic crisis.

More importantly, Honolulu is not any other city. The potential visual impacts of the rail project have hardly been debated, and the impacts will be substantial. I can point to the tearing down of the Embarcadero Freeway in waterfront San Francisco, referenced in last night's debate, as an example of the city belatedly realizing what a treasure it obstructed in the rush to build a freeway. The same can be said of the rush to build a rail system without forethought to the environmental effects on a city that relies on its physical attraction as part of its uniqueness as both a destination location and a beloved home to its residents.

Lastly, it is apparent the high stakes the city has put on the project just by the veritable horde of consultants and staff at last night's meeting. Reference was made to the money spent on consultants to the rail project. I agree with that criticism, and add to it my anger over taxpayer-funded advertisements run endlessly before the election to PROMOTE the rail project, not provide public education.

Ann F. Nakao
909 Kapiolani Blvd, #703
Honolulu, Hi. 968
808-394-9707

08 DEC 12 P 3 :
OTS
RAPID TRANSIT

Honolulu High-Capacity Transit Corridor Project

Welcome to the Honolulu High-Capacity Transit Corridor Project's Public Hearing for the Draft Environmental Impact Statement/Section 4(f) Evaluation.

This public meeting and hearing has been designed to inform the public about the transit project, explain materials contained in the Draft EIS, answer questions from the public, and collect public input on project issues related to the Draft EIS, Section 106 of the National Historic Preservation Act, Section 4(f) of the U.S. Department of Transportation Act, and floodplains affected by the project.

Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulustransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulustransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: Ara Nakao Address: 909 Kapiolani Blvd
Phone: 808-794-9707 # 703
E-mail: aranakao@yahoo.com Honolulu 9681x

Comment(s):

see attached

1000 TDCS1038

RT12/08-291321

Dept of Transportation Svcs

CSO South St, 3rd Floor

Hon. HI 96813

12/11/08

re: Rail

- 1. I am against the rail - Too Expensive!
- 2. If it is done, it makes more sense to do the Pearl City - Downtown road bike. It is the major traffic corridor with probably the largest ridership.

I also makes the land more ^{easily} acquirable and least subject to speculation before acquisition.

DTS
RAPID TRANSIT

'08 DEC 12 P 3:29

Very Truly
Phillip T. Kishimori

Phillip T. Kishimori
4389 Mala St. Hialeah AL #691
Honolulu, Hawaii 96821

PH: 455-2852



Bishop Museum
Honolulu, Hawaii

Bishop Museum was founded in 1889 by Charles Reed Bishop as a memorial to his wife, Princess Bernice Pauahi Bishop, the last direct descendant of King Kamehameha I. The original collections were based largely on the royal family's treasuries.

Hawaiian Hall—built from 1898 to 1903, this Victorian masterpiece features three floors of artifacts that illuminate the fascinating history, culture and ethnic diversity of Hawaii.

03 DEC 2008 PM 2 L

RT12/08-291103



re: rail route,
we'd favor Pearl City
to town, vice the airport,
for the first phase.

Martinez Family
67-275 Farrington Hwy.
Waihala, HI 96791

Published by © 2004 Maui Pacific Travelers, a Division of The Islands Group
www.bishopmuseum.org • Printed in Australia

Dept of Transportation
Services
650 S. King St.
3rd floor
Honolulu HI

@c: Interested Parties

RT 12/08-292454

425 Ewa Pl Apt 305A

Honolulu, HI 96815

DTS
RADIO TRANSIT

'08 DEC 22 AIO:16

Dec 11, 2008

Department of Transportation
650 S. King St. 3rd floor
Honolulu, HI 96813

Dear Department Members:

My husband & I have lived in Hawaii for more than 22 years.

As former New York residents who were born & raised in the city we know all too well about the problems with your proposed elevated system.

They are noisy, dirty, very polluting and would further destroy the beauty that was once present on our island.

The property on 3rd Avenue in N.Y.C. did not appreciate in value until the structure was torn down.

We would like to add that all Transit in N.Y. have policemen & transit employees at all times. They could be & would be unsafe & no one would ride them without police. Stop the train. Let's see our traffic woes. There are other solutions - N.Y. Mayor John Mayor

Michael Burton
2889 Ala Ilima St # 16A
Honolulu, HI. 96818
December 12, 2008

08 DEC 16 A9 48

DTS
RAPID TRANSIT

Honolulu High-Capacity Transit Corridor Project
Department of Transportation Services
650 N. King Street 3rd floor
Honolulu, HI. 96813

Dear Sirs:

I am writing to express my support for the rail project. I also would like to show and share a comment expressed by Councilman Charles Djou.

I support the rail project however; Councilman Djou offered some changes to this project, one of which I support the other I do not. The proposal I support from Councilman Djou is his viewpoint on where the project should start. In regards to the fact that monies to complete this rail project aren't 100% secured and the fact that it is very expensive, there is a chance we could run out of monies before completing the whole thing. Therefore I suggest that Councilman Djou comment "start the project in the Aiea area" be taken into consideration. This in turn would get the project in full operation where it's most needed. The Kapolei end can be completed over the back end of this operation. The changes in the route from Salt Lake to the airport I feel is poorly thought out from Councilman Djou. This portion I have address in a previous letter and I will not repeat it here.

Thank you for your support.

Sincerely,



Michael Burton

Michael Burton
2889 Ala Ilima St. #16A
Honolulu, HI. 96818
December 5, 2008

Department of Transportation Services
650 N. King St. 3rd floor
Honolulu, HI. 96813

08 DEC 16 A9:48

DTS
RAPID TRANSIT

Dear DOTS:

I am a long-time resident of the Salt Lake community, I am writing to express my concern about the recent discussions and pending decision to reroute the rail from the Salt lake community. I don't understand the rational behind this proposal but, I'd like to offer some constructive insight to this project.

The whole intention of the rail is to service the people of Oahu, especially along the corridor from Kapolei to downtown and onward to the University of Hawaii. My argument addresses the proposed change in the route from Pearl Harbor to the Airport rather than through the Salt lake community. If the intention of the Rail is to service the people Of Oahu than routing this project into a residential community would better serve its means by meeting the public where it is most convenient. This in turn would result in higher usage and a faster return on your investment

The proposed routing of the rail from the Pearl Harbor to the Airport would not be a wise use of public money because:

- 1) The rail will not be supporting the people of Oahu fully by bypassing densely populated communities along this route.
- 2) The rail infilstructure would intrude on large portions of federal land along this route. This in turn would result in large delays in the projects progression due to permitting of these intrusions along the route. These delays would amount to cost overruns on an already costly project.
- 3) Navigating around the physical structures within the airport industrial area if this is possible would again drive up the cost of this project tremendously.

I believe that there are council members who maybe holding onto the notion of tourist "taking the train to the plane" ideal. This I feel is fanciful thinking on behalf of some council members. Oahu is not like some of the major cities with rail like New York, Chicago, San Francisco or Los Angeles. Tourists in these cities are prone to catch a flight over night to somewhere; in Hawaii (with the exception of locals) more than likely they will be traveling with large bags. If this is the case, the same restriction that commuters on the bus experiences would apply here. If you can sit your bag on your lap or under your chair, then you're fine. Items bigger than that you'll have to catch a Cab. Lastly I

propose being myopic on this project. We (the people of Oahu) have spent a lot of money for the sake of tourism and there is litter to show for it. Case and point, look on the numerous projects at the airport that were done under the guise for tourism, and where are the tourists now.

Now consider the Salt Lake blvd connection. The rail would leave Pearl Harbor and make a 90 degree turn towards Salt Lake:

- 1) The Pearl Harbor station could double as an Aloha Stadium stop supporting the big events we have from time to time.
- 2) The rail can continue over the freeway with a possible stop at Radford High school and Boughanville Rd, which in turn would support the Foster village area.
- 3) The rail will continue on toward Aliamanu Elementary school/ Salt Lake Community and from here to wards Mapunapuna Industrial area/ Puuloa Rd.
- 4) This whole route is on city and county land that skirts military property. Therefore, little delays in third party planning and permitting.

The Salt Lake route would support the Foster village community as well as the Salt Lake community which is a densely populated area. This rail route will alleviate a portion of the standing room only experience that affects commuters on the bus routes (#32 & 3) into downtown Oahu

In my opinion this is the most sensible route and use of tax payers money. However, if the other members of the council still strongly support the "train to the plane" notion I have another suggestion. The rail could continue down Puuloa Rd over the freeway and onto Lagoon drive. On the corner of Lagoon Dr. and Aokele St, there is a parking lot there that the airport is now using for extended parking. Plus there is a shuttle service to pick up these patrons. If the rail created a stop here the shuttle could now pick up the rail commuters as well.

This scenario I believe is the best answer to this rail challenge within this corridor. I hope you will take this into full consideration in the development of your plans.

Sincerely,



Michael Burton

291953

U.S. Department of Homeland Security
FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA. 94607-4052



FEMA

December 12, 2008

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

Dear Mr. Yoshioka:

This is in response to your request for comments on the Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement/Section 4(f) Evaluation.

Please review the current effective Flood Insurance Rate Maps (FIRMs) for the City and County of Honolulu (Community Number 150001), Map revised June 2, 2005. Please note that the City and County of Honolulu, Hawaii are participants in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.
- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any *development* must not increase base flood elevation levels. **The term *development* means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

www.fema.gov

AR00057831

Wayne Y. Yoshioka, Director

Page 2

December 12, 2008

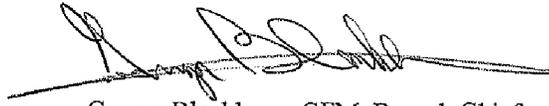
- All buildings constructed within a coastal high hazard area, (any of the "V" Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.
- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at <http://www.fema.gov/business/nfip/forms.shtm>.

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The Honolulu floodplain manager can be reached by calling Mario Siu Li, at (808) 768-8098.

If you have any questions or concerns, please do not hesitate to call Cynthia McKenzie of the Mitigation staff at (510) 627-7190.

Sincerely,



Gregor Blackburn, CFM, Branch Chief
Floodplain Management and Insurance Branch

cc:

Ted Matley, FTA Region IX

Mario Siu Li, NFIP Coordinator, City and County of Honolulu

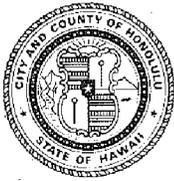
Carol Tyau-Beam, State of Hawaii, Department of Land and Natural Resources

Cynthia McKenzie, Senior Floodplanner, CFM, DHS/FEMA Region IX

Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

www.fema.gov

AR00057832



CITY COUNCIL

CITY AND COUNTY OF HONOLULU
HONOLULU, HAWAII 96813-3065

Charles K. Djou

Councilmember, District IV

Chair, Intergovernmental Affairs Committee

Phone: (808) 768-5004 / Facsimile: (808) 768-5011

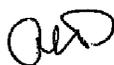
Email: cdjou@honolulu.gov

Web: www.honolulu.gov/council/d4

MEMORANDUM

DATE: December 17, 2008

TO: Wayne Yoshioka, Director
Department of Transportation Services

FROM: Councilmember Charles K. Djou 

SUBJECT: **DRAFT ENVIRONMENTAL IMPACT STATEMENT**

Pursuant to your letter of November 12, 2008 that was sent with the DEIS and of November 13, 2008 to Council Chair Apo, I enclose a comment sent by email on the DEIS. By copy of this memorandum, I send a copy to Mr. Ted Matley of FTA Region IX.

Please do not hesitate to contact me if you have any questions. Best wishes.

cc w/ encls.: Mr. Ted Matley
FTA Region IX

DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION SERVICES

08DEC18 P 3:41

RECEIVED

Matsuda, Sylvia

From: Djou, Charles
Sent: Wednesday, December 10, 2008 5:10 PM
To: Matsuda, Sylvia
Subject: FW: 1st Phase of Rail

Please forward to the FTA in San Francisco.

Charles K. Djou
Councilmember, District IV (Waikiki, East Honolulu)
Honolulu City Council
530 South King Street, Suite 202
Honolulu, Hawaii 96813
Phone: (808) 768-5004
Fax: (808) 550-6689
Email: cdjou@honolulu.gov
Web: www.honolulu.gov/council/d4

From: Lora Burbage [<mailto:llburbage@yahoo.com>]
Sent: Wednesday, December 10, 2008 4:05 PM
To: Djou, Charles
Subject: 1st Phase of Rail

Aloha Councilmember Djou,

To whom it may concern:

Councilmember Djou's proposal to construct the first phase of the rail, from the Aiea to the Pearl City area into Honolulu makes a lot of sense. Not just for the fact that this section of the rail will be usable immediately upon completion, taking people into the city but also due to the uncertain economic times we are in right now. Let's face it we just might not have the money to complete the whole thing, I really hope this doesn't happen but it is a strong possibility.

Starting the first phase from Kapolei to Waipahu makes no sense because I'm sure very few people are needing to get to Waipahu for work. The majority of the people need to get into the downtown area. If we should run out of money, this first phase would be a waste of hard earned money.

Mahalo nui loa,
Lora Burbage

EducationYearRound.com
A Love for Learning Will Last a Lifetime!

Lora Burbage EducationYearRound.com A Love for Learning Will Last a Lifetime!

12/11/2008

Evelyn Arakaki, 91-030 Amio Street, ewa beach hi 96706

December 6, 2008

To Mr. Wayne Yoshioka concerning the DEIS for the rail system.

Dear Mr. Yoshioka,

I would like to have this comment made to the DEIS on the rail transit system. A reply would be appreciated.

My comment: I have lived in Hawaii most of my life. We have a unique and beautiful sense of beauty many call it a Hawaiian sense of place. The visual image of an overhead train 30 feet over my head and which can be viewed from all over the south side of Oahu will be very ugly. The DEIS does not address this point that the train will be a visual blight and give a negative impression to our visitors. What will the city do and how much will it cost to make the train acceptable to the residents and contribute to the view instead of taking away our beauty?

Mahalo
Evelyn Arakaki

Copy to: FTA Mr. Ted Matley
Gov. Linda Lingle

RECEIVED
08 DEC 18 P 3 : 40
DIRECTOR'S OFFICE
DEPARTMENT OF
TRANSPORTATION SERVICES

POLICE DEPARTMENT
CITY AND COUNTY OF HONOLULU

801 SOUTH BERETANIA STREET · HONOLULU, HAWAII 96813
TELEPHONE: (808) 529-3111 · INTERNET: www.honolulu.police.org

29/203

MUFI HANNEMANN
MAYOR



OUR REFERENCE BS-DK

December 9, 2008

BOISSE P. CORREA
CHIEF

KUL D. PULZULU
R. A. GOSNEY
PUTY CHIEFS

DIRECTOR'S OFFICE
DEPT. OF TRANSPORTATION SERVICES

DEC 11 12:41

RECEIVED

TO: WAYNE Y. YOSHIOKA, DIRECTOR
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: BOISSE P. CORREA, CHIEF OF POLICE
HONOLULU POLICE DEPARTMENT

SUBJECT: DRAFT ENVIRONMENTAL IMPACT STATEMENT
SECTION 4 (F) EVALUATION
HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT

Thank you for the opportunity to review and comment on the subject project.

As stated in our previous memorandum to the City Department of Planning and Permitting (dated March 27, 2008), the Honolulu Police Department's involvement in the project is being addressed through the project's Safety and Security Management Plan.

If there are any questions, please call Mr. Brandon Stone of the Executive Bureau at 529-3644.

BOISSE P. CORREA
Chief of Police

By 
DEBORA A. TANDAL
Assistant Chief of Police
Support Services Bureau

cc: OEQC
Mr. Ted Matley, FTA Region IX

Serving and Protecting With Aloha

AR00057836

DRAFT EIS FOR RAIL TRANSIT SYSTEM

- 1) What is the plan for the effect of rail construction on water, sewer, gas and electric utilities? Will there be disruptions of service? Does the budget cover all these contingencies?
- 2) If ridership turns out to be much lower than forecast, are fees going to be increased? Are taxes going to be raised? What is the forecast for number of riders per day (best estimate, range from low to high)?
- 3) Is corrosion of rail cars an issue to be concerned about?
- 4) In case of disaster, such as a hurricane or tsunami, will the train operate?
- 5) How are viewplanes affected by rail? Are the aesthetics of the structure and each station adequately addressed in the DEIS?
- 6) How are the schools (and the students in those schools) along the route going to be affected by the overhead structure, the continuous high current exposure and the intermittent noise and vibrations?
- 7) Will Aloun farms be relocated? If so, where will they go?
- 8) Will there be washrooms, convenience stores, and vending machines at the stations? Will the platforms have adequate seating?
- 9) Will bikes, surfboards and luggage be allowed on the train? Will there be any restrictions on time of day (i.e. not allowed during commute hours)? What is the size limitation?
- 10) Lanes will be taken away during construction. Where are the lane closures and what is the duration of closure? Are there traffic rerouting plans?
- 11) Bus routes will change. Will the public be notified of the changes and accommodations made for temporary stops? What happens to the express bus routes?
- 12) When and at what cost will spurs to the airport, UH-Manoa and Waikiki be built?
- 13) What pedestrian and bicycle amenities will be designed and built in or near transit stations?
- 14) Will there be seamless connections to bus service, bikeways, and other modes of transportation? Will there be park-and-ride lots near the transit stations? Will those lots have priority (i.e. be built first) over bus, bike and pedestrian access to the stations?
- 15) Will there be assistance devices for the elderly and handicapped? Will fares be subsidized to encourage ridership? If so, what is the target group for those subsidized fares? What percent of the cost of rail (construction, maintenance and interest paid on bonds) is expected to be paid with fares? What if fares do not meet this percentage? Will fares and/or taxes be raised? By how much?

16) Will there be subsidized transit passes for government employees? How about private companies doing the same for their employees? Will businesses that provide free parking to employees be required to offer an equivalent monetary amount to those who choose not to drive?

17) How will rail promote mixed-use, transit-oriented development that revitalizes established urbanized areas to focus new growth where infrastructure and access to jobs, shopping, services and recreation already exist?

18) What is the amount of carbon dioxide emitted by rail per person-mile when at maximum capacity? How does this compare to a Prius (50 mpg) with a solo driver? What is the maximum capacity of the proposed rail system?

19) How much energy does rail use (in kwh) per person-mile when at maximum capacity? Again, how does this compare to a Prius (50 mpg) with a solo driver?

20) Where will the power come from to operate the rail system? Will HECO build a power plant to run the rail? If not, is there enough current base load capacity to operate rail?

21) What are the plans (if any) to run rail on renewable sources of energy? I do not include palm oil as a renewable source of energy. Is photovoltaic, wind, concentrated solar, wave, methane from the landfill or OTEC being considered at all? If not, why not?

22) Will energy from HPOWER be used to power the rail system? If so, how much energy? Will there be any extra air pollution from HPOWER if this occurs?

Thank you for answering my questions on rail. Please send answers to:

Randy Ching
1560 Kanunu St, #818
Honolulu, HI 96814

Telephone: 808-942-0145
Email: oahurandy@yahoo.com



DEPARTMENT OF BUSINESS,
ECONOMIC DEVELOPMENT & TOURISM

298455 LINDA LINGLE
GOVERNOR
THEODORE E. LIU
DIRECTOR
MARK K. ANDERSON
DEPUTY DIRECTOR

No. 1 Capitol District Building, 250 South Hotel Street, 5th Floor, Honolulu, Hawaii 96813
Mailing Address: P. O. Box 2359, Honolulu, Hawaii 96804
Web site: www.hawaii.gov/dbedt

Telephone: (808) 586-2355
Fax: (808) 586-2377

February 3, 2009

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

Dear Mr. Yoshioka:

Subject: Honolulu High Capacity Transit Corridor Project
Draft Environmental Impact Statement (EIS)

RECEIVED
09 FEB 5 P12:34
DIRECTOR'S OFFICE
DEPARTMENT OF
TRANSPORTATION SERVICES

Thank you for sending the State Department of Business, Economic Development & Tourism (DBEDT) a copy of the subject document for review. Following are the recommendations of my department by division.

Research and Economic Analysis Division

DBEDT's Research and Economic Analysis Division, the departmental lead for economic research, methodology, data collection and tracking, has the following recommendations.

1. Page 4-154, Employment: The description on indirect and induced jobs is not clear. We recommend the following wording: "Indirect employment is the jobs created in the supporting industries such as building suppliers, wholesale and retail trade, and transportation, as a result of the rail construction. Induced employment results from the increase in spending by the employees of the construction and other supporting industries from income derived from the rail construction."
2. Table 4-33: The employment impacts are over estimated for the following reasons:
 - A) Total costs were used in estimating the jobs impact, which is equivalent to the assumption that all funds are coming from out of state. Most of the funding comes from the 0.5% County Surcharge Tax. Oahu residents will reduce their consumption on other goods and services due to the increase in the total tax rate. The job loss due to the reduction in resident spending should be taken into account.

- B) The assumption that all funds will be spent on construction is not accurate. A portion of the funds will be used for importing equipment and conducting other studies like the one under review. When calculating the employment impact, it is better to itemize the spending by sector rather than assume that it will all be spent on one industry - construction.

Strategic Industry Division

The Strategic Industries Division of DBEDT, the departmental lead on energy, science and technology issues, has the following recommendations.

1. Page 4-108: With respect to the amount of power the system is projected to consume, the report states, "The Project would consume approximately 1 to 2 percent of the total projected electricity generated in 2030." This is open to some interpretation. What is the actual amount of power the rail will need to operate, and will that demand coincide with the utility's peak electrical demand? Will the City and County develop any type of renewable energy or energy storage projects to meet the requirements for the system? The report goes on to state, "Integration of photo-voltaic cells into stations and other project features could reduce net project electricity demand." How much PV are they estimating they will install, and what percentage of station or system energy requirements will be met by these additions? What other alternatives are they considering as primary or backup power for the system? The bottom line is that more specific details should be provided.
2. In addition, we would like to call your attention to the following considerations:
 - A) **State energy conservation goals.** Project buildings, activities, and site grounds should be designed and/or retrofit with energy saving considerations. The mandate for such consideration is found in Chapter 344, HRS ("State Environmental Policy") and Chapter 226 ("Hawaii State Planning Act"). In particular, we would like to call to your attention HRS 226 18(c) (4) which includes a State objective of promoting all cost-effective energy conservation through adoption of energy-efficient practices and technologies.
 - B) **Energy and resource efficiency.** We encourage a leadership commitment to implement innovative and resource efficient operations and management, and to design and construct related buildings to meet and receive certification for U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED), among others. We also

Mr. Wayne Y. Yoshioka
February 3, 2009
Page 3

encourage planning for or installing energy reduction, energy savings,
or energy producing efforts and technologies to lessen electrical
consumption or to increase efficiencies in using electrical energy.

Thank you for allowing us to provide these recommendations and we look forward to
receiving a copy an updated Final EIS.

Sincerely,

A handwritten signature in black ink, appearing to read 'Theodore E. Liu', written over a large, light-colored scribble or mark.

Theodore E. Liu

c: Barry Fukunaga, Office of the Governor

LINDA LINGLE
GOVERNOR OF HAWAII



298461
CHIYOME L. FUKINO, M.D.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. Box 3378
HONOLULU, HAWAII 96801-3378

In reply, please refer to:

EPC08-163

February 3, 2009

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

RECEIVED
DIRECTOR'S OFFICE
DEPARTMENT OF
TRANSPORTATION SERVICES

FEB 5 PM 2:35

Dear Mr. Yoshioka:

SUBJECT: Draft Environmental Impact Statement (EIS) for Honolulu High-Capacity Transit
Corridor Project (HHCTCP)
Honolulu and Ewa Districts, Oahu, Hawaii

Thank you for allowing us to review and comment on the subject application. The document was routed to the various branches, offices and groups of the Department. We have the following Wastewater Branch, Clean Water Branch, Hazard Evaluation and Emergency Response Office, Indoor and Radiological Health Branch, Built Environmental Working Group and General comments.

Wastewater Branch

The document identifies the current and future need to address mobility and travel reliability issues to support transportation and land use planning policies, and improve transportation equity in the corridor between Kapolei and the University of Hawaii at Manoa on the Island of Oahu.

The subject project is located in the Critical Wastewater Disposal Area (CWDA) where no new cesspools will be allowed.

Information provided to our office showed that the HHCTCP's Maintenance and Storage Facility may generate domestic and non-domestic wastewaters. We have no objections to the draft EIS provided all wastewaters generated by the facility shall be connected to the available public sewer system.

AR00057842

Clean Water Branch

The Department of Health (DOH), Clean Water Branch (CWB), has reviewed the subject DEIS. The CWB staff also attended December 16, 2006 Honolulu High-Capacity Transit Corridor Project Water Resources Agency Coordination Meeting held at the Transit Office. Please note that our review and comments are based on the limited technical information provided in the DEIS and additional information and knowledge obtained during the agency coordination meeting and its compliance with Hawaii Administrative Rules (HAR), Chapters 11-54 and 11-55. The City and County of Honolulu (CCH), Department of Transportation Services (DTS), may be responsible for fulfilling additional requirements related to our program. We recommend that CCH-DTS and its consultant also read our standard comments on our website at <http://www.hawaii.gov/health/environmental/env-planning/landuse/CWB-standardcomment.pdf>.

1. Any project and its potential impacts to State waters must meet the following criteria:
 - a. Antidegradation policy (HAR, Section 11-54-1.1), which requires that the existing uses and the level of water quality necessary to protect the existing uses of the receiving State water be maintained and protected.
 - b. Designated uses (HAR, Section 11-54-3), as determined by the classification of the receiving State waters.
 - c. Water quality criteria (HAR, Sections 11-54-4 through 11-54-8).
2. An application for an individual Section 401 Water Quality Certification (WQC) authorized under Clean Water Act (CWA), Section 401; Hawaii Revised Statutes (HRS), Section 342D-53; and HAR, Chapter 11-54 is required for the subject project. Table 4-37 (Page 4-176 of DEIS) has identified that a Department of the Army (DA) CWA, Section 404 permit is anticipated. As discussed in Item No. 4.13.1 (page 4-128 of DEIS), the requirement of a DA Section 404 permit triggers the need for DOH's CWA, Section 401 WQC.

We were further informed at the meeting that a standard (individual) DA CWA, Section 404 permit is required for the placement of drilled shafts/piers in at least four (4) streams.

In addition, the construction of any drainage outfall and associated shore protection structures may also require the DA CWA, Section 404 permit and DOH Section 401 WQC coverage if the work is to be conducted below the high water mark.

Section 401 WQC Application and Guidelines may be picked up at our office or downloaded from our website at:
<http://www.hawaii.gov/health/environmental/water/cleanwater/forms/wqc-index.htm>

3. The CCH-DTS is required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for discharges of wastewater, including storm water runoff, into State surface waters authorized under CWA, Section 402; HRS, Chapter 342D; and HAR, Chapter 11-55. An NPDES permit is required for effluent discharges from the following activities and/or facilities:
 - a. Storm water associated with industrial activities, as defined in Title 40, Code of Federal Regulations, Sections 122.26(b)(14)(i) through 122.26(b)(14)(ix) and 122.26(b)(14)(xi).
 - b. Storm water associated with construction activities, including clearing, grading, and excavation, that result in the disturbance of equal to or greater than one (1) acre of total land area. The total land area includes a contiguous area where multiple separate and distinct construction activities may be taking place at different times on different schedules under a larger common plan of development or sale. **An NPDES permit is required before the start of the construction activities.**
 - c. Treated effluent from leaking underground storage tank remedial activities.
 - d. Hydrotesting water.
 - e. Construction site dewatering effluent.
 - f. Vehicles wash area(s).
 - g. Small Municipal Separate Storm Sewer System.

For certain types of discharges into Class A or Class 2 State waters, CCH-DTS may apply for NPDES general permit coverage by submitting a Notice of Intent (NOI) form. The CCH-DTS must submit a separate NOI form for each type of discharge at least 30 days prior to the start of the discharge activity, except when applying for coverage for discharges of storm water associated with construction activity. For this type of discharge, the NOI must be submitted 30 days before to the start of construction activities. The NOI forms may be picked up at our office or downloaded from our website at:

<http://www.hawaii.gov/health/environmental/water/cleanwater/forms/genl-index.html>

4. The CCH-DTS must also submit a copy of the NOI or NPDES permit application to the State Department of Land and Natural Resources, State Historic Preservation Division (SHPD), or demonstrate to the satisfaction of the CWB that SHPD has or is in the process of evaluating your project. CCH-DTS should submit a copy of their request for review by SHPD or SHPD's determination letter for the project along with CCH's NOI or NPDES permit application, as applicable.
5. The adequacy of the statement (Page No. 4-134 of DEIS) "[M]ost of the guideway, stations, and transit facilities are planned within roadway corridors and in non-wetland area. Therefore, no direct impacts to wetlands are expected for any of the Build Alternatives" and the statement (Page No. 4-135) that "[B]ecause no impact to wetlands are expected, no mitigation is expected to be required," needs to be re-evaluated. (Emphasis added)
 - a. The DEIS needs to discuss in details whether wetlands exist within the project construction and operation limits. There was no discussion on potential impacts to wetlands in the Water Resources Technical Report. Limited discussion regarding wetlands' presence is located in Item No. 4 of the "Natural resources Technical Report" and Page Nos. 4-128 and 4-130 of the DEIS. The potential indirect impact to the "spring-fed" wetland system in Kalauao adjacent to a segment of the project (and is currently used by the Sumida Watercress Farm) is identified in the DEIS.
 - b. Page No. 4-21 of the August 15, 2008 "Natural Resources Technical Report" indicated that Field investigation of wetlands along the proposed alignment was conducted in December 2007 and January 2008. But, there is no indication of whether a wetlands delineation was performed. Wetlands delineation and wetlands function shall be properly identified and mitigation measures proposed if adverse impacts to wetlands are "**unavoidable**." We acknowledge that Page No. 4-128 of the DEIS did indicate that "[I]f mitigation is required for fill placed in the wetlands, the project must comply with *Compensatory Mitigation for Losses of Aquatic Resources Final Rules*." However, under this situation, the CWB prefers to have the on-site compensatory mitigation measures that will address wetlands function replacement and acreage loss.
6. For water pollution control purposes, DEIS and associated technical reports should also include an assessment of potential adverse impacts to the quality of receiving State waters resulting from the construction site(s) storm water discharges (either directly or indirectly) into and construction activities within the State waters including perennial streams, intermittent streams, gulches, ditches, nature drainage ways, etc.

Mr. Yoshioka

Page 5

2/3/2009

7. Prior to DOH's establishment of Total Daily Maximum Loads (TMDL) for CWA, Subsection 303(d) listed water bodies, discussion is needed on what types of Best Management Practices (BMPs) measures will be implemented during the project construction and operations period to ensure that there will be **"no net increase of loadings of pollutants of concerns"** for each of the listed streams, estuaries and embayments.

We note that Page No. 4-1 of the "Water Resources Technical Report," identified that many of the streams within the construction corridor are listed by the DOH as impaired water bodies under CWA, Subsection 303(d). Item No. 2.1.3 (Page No. 2-4) of the same report also indicated that "during the design phase of each section of the project area, a Permanent BMPs Technical Manual will be produced."

8. An Applicable Monitoring and Assessment Plan (AMAP) shall be properly established and implemented to adequately monitor and assess potential project construction related Short-term impacts and operations related long-term impacts.

An AMAP shall be properly designed and implemented to ensure the adequacy of the implemented BMPs measures and to demonstrate that the project construction and operations related activities do not cause applicable water quality criteria to be violated in the receiving State waters.

An AMAP should be developed using the Data Quality Objectives (DQO) planning process and include Quality Assurance (QA) and Quality Control (QC) methods to be used. The purpose and goal of the DQO process can be found at <http://www.hanford.gov/dqo>.

9. The CCH-DTS shall be informed that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage and/or Section 401 WQC are required, must comply with the applicable State's Water Quality Standards. Noncompliance with water quality requirements contained in HAR, Chapter 11-54, and/or permitting requirements, specified in HAR, Chapter 11-55, may be subject to penalties of \$25,000 per day per violation.

If you have any questions, please visit our website at <http://www.hawaii.gov/health/environmental/water/cleanwater/index.html>, or contact Mr. Ed Chen of the Engineering Section, CWB, at 586-4309.

Hazard Evaluation and Emergency Response Office (HEER)

The route of the fixed guide-way rail system goes through agricultural and industrial areas where soil contamination may be encountered during excavations for the system's construction. It is appropriate to conduct Phase I investigations of those properties with the potential for chemical contamination, and Phase II studies when necessary. This includes businesses associated with

Mr. Yoshioka
Page 6
2/3/2009

automotive repair (oil and solvents), dry cleaning (chlorinated solvents), petroleum and petroleum products refining and storage (gasoline, diesel and other products), pesticide mixing and storage facilities (metals, dioxins, chlorinated pesticides/herbicides), etc.

A major component of potential contamination is the array of pipelines in the Iwilei District. There are also extensive areas of known contamination along Dillingham Boulevard and the rest of the Honolulu Harbor area. Great care should be taken when excavating along this route. Coordination with the HEER Office is imperative. The appropriate contact for the Iwilei District is Anna Fernandez. She can be reached through the HEER Office at 586-4249.

In summary, the City and its contractors should be in direct contact with the HEER Office to locate properties along the route already in the HEER Database. All Phase I reports, sampling plans, and Phase II reports should be reviewed by the HEER Office. Please call Richard Palmer at 586-0957 if you have any questions regarding the comments.

Indoor and Radiological Health Branch

Project activities shall comply with the Administrative Rules of the Department of Health, Chapter 11-46, Community Noise Control

Should there be any questions, please contact Russell S. Takata, Environmental Health Program Manager, Indoor and Radiological Health Branch, at 586-4701.

Built Environmental Working Group

The Hawaii Department of Health Built Environment Working Group (BEWG) is comprised of 20 representatives from 12 divisions within the Department holding as its overarching goal cross-programmatic collaboration. By implementing this approach, we intend to improve the health and safety of Hawaii residents through the promotion of healthy community design policies and practices.

Based on our review of the Honolulu High Capacity Transit Corridor EIS Review, the following are a listing of our recommendations and comments:

Recommendations:

Transit User Benefits Section: Recommendation is to include the health benefits of utilizing transit. (Summarized by Katie M. Heinrich, Ph.D.)

- Over time, physical activity levels have declined due to increased reliance on time-saving devices, and reduced physical demands of work, housework, and travel. This has created an energy imbalance (consuming more calories than are expended) resulting in higher obesity rates.¹ Rail transit has the potential for increasing physical activity, since most

trips begin and end with walking.²⁻³ As compared to people who do not use public transit, those using rail walk an additional 10.5 more minutes per day,⁴ with 1/3 of American transit users walking the recommended 30 minutes per day.² Even small increases in physical activity, such as a brisk walk of 15-20 minutes, help expend up to 100 calories per day, potentially attenuating weight gain for 90% of the population.⁴ By construction, light rail stops involve greater distance than bus stop, inviting more walking, and one round-trip rail commute involves an average of 4 walking trips each day.⁵ Rail use can also result in public health cost savings (e.g., \$12.6 million over 9 years for 9100 residents in Charlotte, NC;¹ or \$4800-\$6600 per person each year nationally⁴), development rights around rail stations and rights of way, increased land values, lower rates of injury and death, reductions in vehicular accident costs, reductions in air pollution, increased access to care, stress reductions, and reduced traffic congestion.^{1,2,4} It is imperative that the design of areas around and to rail stations is a collaborative effort between health, housing, transportation, and environmental advocates in order to create an attractive built environment that supports walking to destinations for everyday activities.^{3,5}

References

1. Stokes RJ, MacDonald J, Ridgeway G. Estimating the effects of light rail transit on health care costs. *Health Place* 2008;14:45-58.
2. Besser LM, Danneberg AL. Walking to public transit: steps to help meet physical activity recommendations. *Am J Prev Med* 2005;29(4):273-280.
3. Li F, Harner PA, Cardinal BJ, Bosworth M, Acock A, Johnson-Shelton D, Moore JM. Build environment, adiposity, and physical activity in adults aged 50-75. *Am J Prev Med* 2008;35(1):38-46.
4. Edwards RD. Public transit, obesity, and medical costs: assessing the magnitudes. *Prev Med* 2008;46:14-21.
5. Brown BB, Werner CM. A new rail stop: tracking moderate physical activity bouts and ridership. *Am J Prev Med* 2007;33(4):306-309.

Chapter 2, Page 2-20 states that it is "envisioned" that bicycles will be allowed on trains. Recommendation would be to plan for bikes to be allowed on trains as well as in the design of the transit stations. Light rail vehicles can be equipped with interior bike racks as achieved in other states. Visit http://www.vta.org/services/bikes.html#bikes_on_buses for additional information.

Chapter 3, Page 3-35 explains that each guideway vehicle would be designed to accommodate bicycles in "off peak hours". It is recommended that guideway vehicles be designed to accommodate bicycles at all times. The MOST important time to accommodate bicycles would be during peak hours.

It also states that several stations would be located at existing or planned bicycle facilities. Recommendation would be for all stations to have bike facilities. Bike stations that are installed

Mr. Yoshioka
Page 8
2/3/2009

at transit stops provide transit users a safe, and secure location to store bikes. It can also provide opportunities for bike share and rentals, bike repair and encourages users who may travel longer distances to utilize transit knowing their bikes could be stored at the station. Visit <http://www.bikestation.org/>.

As mentioned on **pages 3-43 to 3-44**, allowing bikes on trains, as currently envisioned, would create a demand for bicycle lanes or routes near stations. Recommendation would be to plan for access and connections for bicycles to and from transit stations preferably as marked bike lanes or routes.

The discussion of existing bicycle and pedestrian facilities (**3.2.5**) does not mention that the bicycle facilities are also "sometimes narrow or not continuous" as they do mention for the pedestrian facilities. Please include this language in reference to bicyclists as well.

Chapter 4, page 4-93 states that "new vegetation" will be provided whenever trees must be displaced. Recommend that such vegetation should include the planting of new trees whenever feasible and as appropriate.

On visual impacts (Chapter 4), recommend providing visual simulations of the rail system between Halekauwila St. and Ala Moana Center. The height of the rail system is the issue. The Halekauwila St. intersection simulation looks like it runs 20 feet above grade, but does the height increase once it reaches Ala Moana Center? Also, any visual shots to show the project's effects on existing mountain-to-ocean view corridors, like Piikoi St. and Ward Ave, would be welcome.

Comments:

We appreciate the City Department of Transportation Services' willingness to coordinate with the City Department of Planning and Permitting TOD initiative, and that they will ask communities for input on station design elements. We recommend that:

- Each community along the proposed route have a sense of ownership of their neighborhood station
- Public outreach should continue throughout the design and construction phases, especially with regard to environmental justice areas

If the Airport route is chosen over the Salt Lake and combination options, recommend the DEIS provide more discussion on its connectivity with feeder bus routes.

- Based on Chapters 3 and 7, the Airport route appears to have higher ridership, need for fewer parcel acquisitions, fewer acres converted to transportation usage, and would be built on level, less hilly terrain.

Mr. Yoshioka
Page 9
2/3/2009

- The Airport route seems to be slightly less cost-effective than the Salt Lake option. However, the small difference appears to be made up by increased ridership.

Linkages between the train stops and local resources should be made apparent (e.g., schools, shopping, parks). Recommend these linkages be provided through visual simulation or GIS mapping.

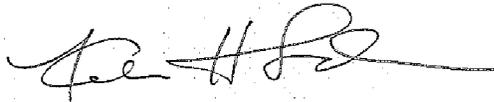
Please call Heidi Smith at 586-4495 if have any questing regarding these recommendations and comments

General

We strongly recommend that you review all of the Standard Comments on our website: www.hawaii.gov/health/environmental/env-planning/landuse/landuse.html. Any comments specifically applicable to this project be adhered to.

If there are any questions about these comments please contact Jiakai Liu with the Environmental Planning Office at 586-4346.

Sincerely,



KELVIN H. SUNADA, MANAGER
Environmental Planning Office

c: Barry Fukunaga, Governor's Office
DDEH
OEQC
WWB
CWB
HEER
IRH
BEWG
EPO

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

**Mr. Wayne Yoshioka
Department of Transportation Services
City and County of Honolulu
650 South King Street, Third Floor
Honolulu, HI 96813**

February 4, 2009

**American Planning Association Hawaii Chapter Comments on
Honolulu High-Capacity Transit Corridor Project
Draft Environmental Impact Statement (DEIS)
And Section 4(f) Evaluation**

APA Hawaii Chapter has been a consistent supporter of the Honolulu Fixed Guideway project due to the potential it holds for both improving transportation mobility and access among the population, and due to the effect it can have on a more compact and sustainable form of development for the communities and the neighborhoods along the corridor.

APAHI comments are provided in two parts: Part One provides general comments are provided regarding the EIS document and the transit project. Part Two gives focused attention and comments on three important areas along the corridor: Kapolei/Ewa District; Waipahu/ Pearlridge; and Kakaako/Ala Moana. These comments reflect APA's strong interest in place-making at both the station areas and in the radius of access to the stations, which is complementary to but different than TOD.

Part One: General Comments

We begin our comments by acknowledging that the preparers had a yeoman task of bringing together so much material and making it presentable to a wide range of interested parties. In that regard, we especially compliment the city and the preparers for their exciting and innovative use of clear graphics and visualization techniques. To our knowledge, this is the first time in Hawaii that video has been used to communicate content to those many who do not have the time or inclination to read through a lengthy, chart-laden document. The introduction overview video, the flyover feature, the interactive station graphics are excellent new tools that communicate the project visually and not just in words.

Continued Community Involvement

We want to encourage the City to continue to find ways to have ongoing community input and involvement throughout the design, construction and implementation phases. In particular, we believe that it is essential that each community develop a sense of ownership regarding its station(s) area and the system as a whole. This is best accomplished through early and frequent involvement that goes beyond one-way information sharing.

While APAHI supports the transit project, we continue to have reservations about both certain aesthetic issues, in particular, the proposed height at several urban locations, most notably Kakaako and Ala Moana. Heights at these stations has changed several times throughout the project, and we urge the City to continue to work with the community, APA and other professional organizations to find design review, value engineering and other means of generating alternate ideas for reducing the effects of a high guideway and station. At a minimum, the project and the Final EIS should go much farther in examining how landscaping and trees can help to not only mitigate/camouflage the guideway, but to provide shaded relief to pedestrians at street level.

Mitigations

In general, the lack of mitigations is a weakness of the Draft EIS which we would like to see corrected in the Final EIS. More attention to bringing better place-making features is essential. We would like to see drafts of the Design Guidelines that are mentioned. Most importantly, we believe that success of the transit project and its integration into the community, requires more attention to the details of how people/passengers are to access the station areas. What are the features of the sidewalks, crosswalks and amenities for pedestrian access, bicycle access, and bus access on a station-by-station basis? Without good (one might even say superior) access treatment that is safe, well-lit and pleasant, people will find other ways to travel than to use the transit. Good design brings good ridership.

Multi-Modal Access and Parking

Access by feeder bus is a critical piece of operations. More information should be provided on bus connections in the Final EIS, and it is expected that once the identification of bus access is started, that many adjustments and mitigation actions will be required. Which routes will run into

which stations? How are passengers transferring from one transit mode to another? What about private and school buses, how can they use the transit center?

The one access mode that is treated in the Draft EIS is auto access, mainly in the form of park and ride facilities. Regrettably, the size and features of these parking facilities only looks at the number of stalls needed to serve the commuter shed. Many of the garages are large and are likely to not fit well into the surrounding community without looking like fortresses. Yet, if not properly sized, some communities will suffer from commuters using their streets for parking. Much much more attention needs to be paid to the trade-offs for proper sizing and management of parking needs.

“ Spillover Parking Effects on Station Areas” (Page 3-41) section states that the West Loch, Pearlridge, Iwilei, and Ala Moana Center stations are projected to have the largest demand for spillover parking and in need of further study. A detailed table should be provided in the FEIS that shows for the Build Alternatives the spillover demand in the morning and evening peak periods for each of the four stations. Public input from community meetings held for the Waipahu Neighborhood TOD Plan indicated that residents felt strongly about the need for a park-and-ride facility at the West Loch station, and that without such a facility there would be spillover parking, particularly from residents living mauka of the freeway.

In designing the parking facilities for station areas, configure parking so that it does not dominate the area. While it is important to consider utilizing on-street parking in certain station areas, take into consideration the protection of neighborhoods. Of the many tools that can be implemented to minimize the impact of parking, the four principal ones are “move it, share it, deck it, and wrap it.”

- Move it: Contrary to common practice, in which parking is located immediately adjacent to the station, broader community goals are best served when parking is moved away from the platform. The land nearest the station is the best land for development, so using it for parking means a lost opportunity. Placing parking a five to seven-minute walk from the station opens prime real estate for development.
- Share it: Sharing the parking among patrons who make use of it at different times of the day or week is an excellent way to minimize the space devoted to parking. The San Diego transit system, for example, shares one of its commuter lots with a multiplex theater. Transit riders use the parking on weekdays, and movie patrons use it on evenings and weekends. Shared parking can be operated privately or by a local parking authority. Parking fees offer an opportunity for additional revenue.
- Deck it: Structured parking is expensive. In Miami, for example, a basic parking garage without sprinklers costs \$6,000 to \$7,000 per space; more highly finished facilities in urban neighborhoods cost between \$10,000 and \$13,000 (creating an additional incentive to charge for parking). Charging for parking tends to be controversial for a transit agency because it is perceived as a deterrent to riders, but it is essential to finance needed facilities.

- **Wrap it:** In place of the typical suburban sea of surface parking, creative designers can wrap a parking structure with retail shops, eateries, residences, and services, such as dry cleaners. This mixed-use approach makes the parking structure more attractive as an urban place, allows people who park there to take care of errands, makes the walk to and from the parking lot more interesting, and creates a built-in clientele for the businesses. This approach allows surface parking to be used as a form of land banking.

Part Two: Focused comments on transit project sections

1) Comments on Kaka'ako-Ala Moana Section (South Street to Ala Moana Center)

Kaka'ako Stations

If the location of the planned station near South Street is shifted to either the mauka or makai side of Halekauwila Street so that it can be integrated into a private development project, what will be impact on the Halekauwila Street right-of-way in terms of column placements and station access from the sidewalk? If the station is directly above the right-of-way, what is the impact on the streetscape (e.g., tunnel effect, station access landings in the sidewalk area, etc.)? While this may seem to be a detailed question to raise in the DEIS stage, the station impacts at the location are magnified because of the narrow right-of-way on Halekauwila Street (see related comments below) and the intensity of existing and project development in this neighborhood.

The planned station makai of Queen Street diamondhead of Ward Avenue is situated entirely within General Growth property. While this is preferable to the taking of a small property fronting Queen Street, as originally proposed, it is unclear how well this placement, as well as the alignment of the guideway approach and departure to this station will fit the planned street system and future redevelopment of this vicinity. The proposed guideway alignment follows the approximate alignment of the Halekauwila Street extension, which is part of Hawai'i Community Development Authority's current Kaka'ako Mauka Area Plan, but is proposed for deletion in the proposed revision to the Mauka Area Plan in favor of new local streets laid out in a "grid" pattern. The guideway alignment would cut diagonally across this grid street pattern rather than following planned street rights-of-way. It is also unclear how the planned station would be integrated into new development of this area. This particular station site should therefore be discussed in more detail to explain how it would be consistent with and supportive of future redevelopment of this area.

Physical Impacts on Halekauwila Street and Kona Street Rights-of-Way Relative to Small Businesses in Central Kaka'ako

Both Halekauwila Street and Kona Street function as local streets, the latter primarily to provide vehicular access to light industrial uses. The rights-of-way of both streets are relatively narrow (50-ft width for Halekauwila; 40-ft for Kona), which constrains their capacity to accommodate columns for the proposed fixed guideway while still providing the travel lanes, parking lanes, sidewalks and potentially bicycle lanes necessary for them to adequately serve as local and

service streets to businesses as well as through traffic for all modes of travel. The Kona Street right-of-way is presently unimproved, lacking formal curbs, gutters, sidewalks, storm drainage systems and on-street parking spaces. Most existing uses along these streets lack sufficient off-street parking and loading spaces, so they depend heavily on the public right-of-way to serve this need.

The DEIS should expand the discussion of the impact of the guideway along these two streets, providing more detailed analysis of the effects of the guideway structure on adjacent uses and their operations. For example, it appears from the plans provided in the DEIS that 28 lots containing at least 80 small businesses along this segment of the rail alignment will have columns placed directly in front of their property. How may the placement of columns impede vehicular access to small lots and businesses? How are specific businesses and properties affected by the loss of on-street parking and loading spaces, including, in the case of Kona Street, the loss of informal parking and loading spaces?

Direct and Indirect Economic Impacts on Central Kaka'ako Small Lots and Small Businesses and on Urban Honolulu

Proposed property acquisition maps provided in the DEIS indicate that 9 private properties in Kaka'ako are slated for acquisition in their entirety. While the DEIS does not discuss details, we estimate that 20 small businesses that generate at least \$14.4 million in annual income are directly displaced by this action. It remains uncertain whether it is viable for these businesses to relocate. For one, many of these businesses, which are predominately service-oriented, may not be able to survive a significant interruption in operations from relocation. Second, these businesses are located in Central Kaka'ako, despite high land costs, largely to provide convenient access to their customers (Hawaii Alliance for Community-Based Economic Development, *A Study of Kakaako Mauka Businesses*, September 2007). Third, there is a dearth of industrial-zoned land in urban Honolulu east of Iwilei, and small industrial service establishments in Iwilei, as well, are being displaced by the higher-value commercial uses that are allowed in that industrial-commercial mixed-use zone. Consequently, the closest true industrial district for small business is Kalihi Kai, where there is little, if any vacant land.

An additional 28 properties in Central Kaka'ako containing a minimum of 30 small businesses are proposed for partial acquisition. While partial acquisition may not necessarily impell the closure of these businesses, construction of the fixed guideway will cause disruptions to the operations of these businesses and inconveniences to their customers, most likely resulting in loss of revenue that could lead, in turn, to business failure. If the businesses manage to survive the construction period, they will continue to struggle against the pressure of rising property taxes due to escalating real estate values brought by proximity to the transit line. If these businesses are forced to relocate due to economic pressure, this will exacerbate the competition for scarce industrial land in urban Honolulu and thereby raise the cost of doing business.

The direct and indirect impacts on the small business district of Central Kaka'ako are not trivial. These businesses employ an estimated 1,971 people and generate estimated annual sales of \$258,900,000 (Hawaii Alliance for Community Based Economic Development, October 2008). However, the indirect impacts extend well beyond Central Kaka'ako because the businesses in this neighborhood serve customers throughout urban Honolulu, including the major employment centers of the Downtown financial district, the Civic Center, Ala Moana and Waikiki. If the

service businesses in Central Kaka'ako disappear, where will residents and employees of urban Honolulu get their cars, appliances or equipment repaired? Where will the suppliers and storage facilities for Waikiki hotels reside? Where will professional and financial offices go for printing and supplies?

Proposed Mitigation Measures for Central Kaka'ako Business District

While transit may have distinct benefits for commuter travel and general mobility, there is a complex network of interdependencies between Central Kaka'ako and the residents and businesses of these surrounding urban districts that will be significantly impaired by the transit project, and we believe this has not been adequately acknowledged in the selection of the preferred alignment through Kaka'ako, the selection of the technology for that route, or in the suggested mitigation measures described in the DEIS. Given the significance of Central Kaka'ako as an employment center and as a service district for urban Honolulu, we believe that an alternative alignment along Kapi'olani Boulevard, as proposed in the rail transit project two decades ago, should be given renewed consideration. If a route through Central Kaka'ako is inevitable, then the City, perhaps with State participation, should develop a proactive program to ensure the preservation of an industrial service district in Central Kaka'ako. Adoption of zoning to allow industrial uses is a passive measure that is insufficient to accomplish this. What is needed are programs to write-down land and redevelopment costs and provide real property and other tax incentives and rebates for small businesses in this district.

Ala Moana Station

As an “end-of-line” station for the MOS with the highest volume of boarding, de-boarding and transferring passengers on the entire system in a vicinity that already experiences a complex mix of traffic, the Ala Moana Station area requires detailed attention to design that accommodates all modes of travel – bus, private passenger vehicle, delivery vehicles, pedestrian and bicycle – in a convenient, efficient, safe and attractive manner. There is very little discussion of this in the DEIS. On page 2-36, for example, it is stated that transit connections to Ala Moana Station will be provided by “enhanced bus service”. What does that mean, exactly? While traffic studies may indicate that Kona Street presently has sufficient capacity to stage those buses, what if passenger volume exceeds projections? Perhaps most important, what facility enhancements are planned for the increased number of pedestrians that will be in this vicinity. What sidewalks will be widened? What crosswalks will be created or enhanced? What bus passenger waiting and loading areas will be developed? How will bicyclists be accommodated? How will conflicts between pedestrian, bicycle, bus and other vehicle movement be avoided or minimized. Will traffic signals or other controls be installed or modified?

Because space is so constrained at the Ala Moana Station site and pedestrian and bicycle pathways to the station are limited, we strongly recommend that a transit center be created on the presently unused property at 1391 Kapi'olani Boulevard (TMK 2-3-039: 011) adjacent to the Ala Moana Station. This could be done through either outright acquisition of the property or joint development with the current or possible future owner. If the latter, the transit center for the private trolleys at the rear of the new Nordstrom store nearby could serve as a model in microcosm for the Ala Moana Station Transit Center.

2) Comments on Waipahu to Pearlridge Section

Land Use Plans

The Future Land Use Plans and Policies Section, p. 4-13, should include summaries of the Waipahu Town Plan and the Pearl Harbor Historic Trails Plan.

Place-Node

The FEIS should include more discussion on the Waipahu Transit Station (Figure 2-18), the Leeward Community College Station (Figure 2-19), the Pearl Highlands Station (Figure 2-20), and the Pearlridge Station (Figure 2-21) in relation to place and node issues. Places need to be easy to get to and should be integrated physically and visually with their surroundings. This requires paying attention to how people can get around by foot, bicycle, public transportation, and the car – and in that order (Dittmar and Ohland, p. 31)

With the exception of the Pearlridge Station, which illustrates a connection to the Pearl Harbor Bike Trail, the above-referenced station areas are not pedestrian or bicycle friendly. The FEIS should include more discussion how these station areas will accommodate pedestrians and bicyclists. Also, a clear statement should be made whether bicycles will be allowed onto the transit platforms and into the cars and if so, where and how.

Parking

The Pearl Highlands Station should consider other parking location alternatives rather than a 1600 parking space parking structure adjacent to the station area. One alternative could include a shared parking approach to reduce the mass parking structure adjacent to a station area. Another alternative could be to charge for parking, which is controversial, but may be necessary for a form of value capture. Include a discussion in the FEIS related to these parking alternatives.

Neighborhoods

In Section 4.5.3 Environmental Consequences and Mitigation, include a discussion on pedestrian crossings along Farrington Highway and Kamehameha Highway in the Waipahu Neighborhood and Pearl City Neighborhood sections.

Visual and Aesthetic Conditions (Chapter 4.7)

Ft. Weaver Road to Aloha Stadium Landscape Unit (Viewpoints 1-4). Significant trees that are not preserved in place should be relocated, if possible, along the transit corridor.

The FEIS should include mitigative measures for Viewpoint 3, Kamehameha Highway at Ka'ahumanu Street, looking makai, since there is a high visual impact obstructing the views of the tree canopies in Neal S. Blaisdell Park.

3) Comments on Kapolei/Makakilo/Ewa District

The urban development/urban investment alternative. The Draft EIS says that improved transit is needed to serve, among other users, the large and increasing number of workers that reside in the Ewa District who commute to various job centers in urban Honolulu. More needs to be said about creating job centers in the Ewa District, for shorter commutes as well as so-called “reverse commutes.” We believe that as State, County and private parties continue to develop higher education campuses, high tech parks, industrial parks, in other words to create a “second city” the transit system will need to continue to evolve with an intra- Ewa “hub and spoke” and/or light rail transit system, not just an Ewa to downtown Honolulu system.

East Kapolei Station. The Draft EIS notes (p. 2-14) that “the East Kapolei Station would have one of the highest boardings in the system,” and would therefore have a park and ride lot. The schematic plan for the East Kapolei Station shows a “Proposed Park and Ride Facility – 12 acres/900 spaces.” There is no indication in the text or on the schematic plan regarding how buses, cars, bicycles, and pedestrians will gain access to this station. There should be some analysis and some conceptual plans for multi-modal access to the Station – especially for peak period conditions.

Ewa Development Plan – Draft Update/Revisions. The Draft EIS discusses (p. 4-13) “Future Land Use Plans and Policies,” should describe the recently released “Ewa Development Plan – Draft Update/Revisions.”

General Comment re: Projected “Total Daily Trips” – The Draft EIS (p. 3-17) projects an increase in Total Daily Trips, from about 3.26 million per day in 2007 to about 4.04 million per day in 2030. It would be helpful to provide the (DBED&T or other source) population projections for Oahu upon which these trips are projected. Some sensitivity analysis for error should be noted as well as the impacts of other factors that influence Total Daily Trip, including gas prices, home-based and tele-commute work, aging population, and similar lifestyle/lifecycle changes.

E NOA CORPORATION

Operators of E Noa Tours & Waikiki Trolley Tours "The Tour & Trolley People"

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DEPT. OF TRANSPORTATION SERVICES

February 4, 2009

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

Dear Mr Yoshioka:

Attached are the Comments of the E Noa Corporation, which operates the Waikiki Trolley, on the Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement/Section 4(f), Evaluation, dated November 2008.

If you have any questions about our statement, please contact me.

Sincerely,



Tom Dinell
Consultant to E' Noa Coporation

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

Mr. Katsumi Tanaka, Chairman of the Board, E Noa Corporation

Mr. Tom Dinell, Consultant to E Noa

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E NOA CORPORATION

Operators of E Noa Tours & Waikiki Trolley Tours "The Tour & Trolley People"

Comments of the E Noa Corporation
February 4, 2009
on
The Honolulu High-Capacity Transit Corridor Project
Draft Environmental Impact Statement/
Section 4(f) Evaluation
dated November 2008

Our comments are restricted to one major area of concern with two facets, namely, participation of private transportation companies in the planning of transit systems and the formulation of public-private partnerships in the operation of such systems. This area of concern is essentially ignored in "The Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement/Section 4(f) Evaluation" (DEIS).

Findings

A search of the EIS document reveals the following:

1. With two exceptions, all references to "buses" are to those operated by City and County under contract to Oahu Transit Services (OTS).
2. The only reference to "public-private partnerships" is in section 6.2.3 relating to funding sources for ongoing capital expenditures. It states that the DEIS did not assume any private sources of capital to fund the project, though it noted joint developments or other public-private partnerships might reduce the cost to the City or allow adding of additional elements. (p. 6-6)
3. The only reference to private transportation companies was in reference to station characteristics. It was noted that: "Paratransit vehicles would be accommodated at all stations and, in some cases, space for private tour buses, taxis, and/or special shuttles also would be included." (p. 2-36)

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4. In the section related to the TSM (Transportation System Management) Alternative, which had been rejected in the Alternatives Analysis (2006), it was noted that a few comments in the scoping meetings or the public information sessions had suggested providing "... additional bus service with either school buses or private vehicles". The DEIS concluded that these suggestions were not materially different than those considered as part of the initial TSM alternative and therefore further analysis was not warranted. (p. 2-7&8)

Conclusions Based on Findings

A review of the findings leads to the following conclusions:

1. There is no indication in the DEIS that any consideration has been given to the possibility of private transportation companies that provide regularly scheduled services to the public supplementing the services provide by City and County OTS buses or to the forming of mutually beneficial public-private partnerships with such firms with the exception of dismissing the possibility out of hand as noted in point 4 in Findings above.
2. There is no reference in the DEIS to federal statutory and regulatory authority relating to the participation of private transportation companies in the planning process or to public private partnerships involving such companies or to the protection of private providers of transit from competition from federally assisted transit providers or other similar provisions.
3. There is no recognition in the Draft EIS that a privately owned transportation company exists in Honolulu that provides regularly scheduled transit services to the public or portions thereof, namely E Noa's pink line, yellow line, University of Hawai'i at Mānoa Shuttle, and Mililani Shuttle.

The Legal Framework

The requirement for participation of private providers of public transportation services, which provide regularly scheduled services,

in the planning of transit and similar projects is clearly laid out in federal law, regulations, and circulars.

Of the five purpose clauses set forth in 49USC §5301(f), three of them emphasize the importance of involving private transportation companies:

- “(f) General Purposes.--The purposes of this chapter are—
- (1) to assist in developing improved mass transportation equipment, facilities, techniques, and methods with the cooperation of public and private mass transportation companies;
 - (2) to encourage the planning and establishment of areawide urban mass transportation systems needed for economical and desirable urban development with the cooperation of public and private mass transportation companies;
 - (3) to assist States and local governments and their authorities in financing areawide urban mass transportation systems that are to be operated by public or private mass transportation companies as decided by local needs.”

The section of the law relating to “private enterprise participation in metropolitan planning and transportation improvement programs and relationship to other limitations” states that: “(a) Private Enterprise Participation. - A plan or program required by section 5303, 5304, or 5305 of this title shall encourage to the maximum extent feasible the participation of private enterprise. ” [49USC §5306(a)]

3. The section of the law relating to public participation requirements states in part that: “Each recipient of a grant shall... (2) develop, in consultation with interested parties, including private transportation providers, a proposed program of projects for activities to be financed... and (6) consider comments and views received, especially those of private transportation providers, in preparing the final program of projects.” [49USC §5307(c)(2) and (6)]

4. The General Provisions on Assistance, which state in part that: “Financial assistance provided under this chapter to a State or local governmental authority may be used ... to operate mass transportation equipment or a mass transportation facility in

competition with, or in addition to, transportation services provided by an existing mass transportation company, only if

- a. The Secretary of Transportation finds the assistance is essential to a program of projects required under sections 5305-5306 of this title; (and)
- b. The Secretary of Transportation finds that the program, to the maximum extent feasible, provides for the participation of the private mass transportation companies. [49USC §5323(a)(1)(A) and (B)]

5. The portion of Federal Transit Administration (FTA) Circular C 9300.1A, Chapter VI, relating to private enterprise, states in part that:

"PRIVATE ENTERPRISE CONCERNS . The concerns of Federal transit law regarding private enterprise focus mainly on including the private sector in participating in local transit programs...and protecting private providers of transit from competition with federally assisted transit providers.

a. **Participation by Private Enterprise.** Both Federal transit law and joint FHWA/FTA planning regulations (discussed in Appendix A of the circular) impose strong requirements for private as well as public sector participation as transportation programs are developed. Plans and programs required for Federal transit assistance must encourage the participation of private enterprise to the maximum extent feasible.

Federal law recognizes the special concerns of private transportation providers that compete with public mass transit authorities. By law, existing private transportation providers are afforded certain safeguards from competition. Specifically, FTA is prohibited from providing Federal assistance to a governmental body that provides service in competition with, or supplementary to, service currently provided by a private transportation company, unless FTA finds that the local transportation program developed in the planning process provides for participation by private transportation companies to the maximum extent feasible.

Accordingly, Federal transit law and the joint FHWA/FTA planning regulations direct special attention to the concerns of private transit providers in planning and project development. Joint FHWA/FTA planning regulations specifically require that private transit providers, as well as other interested parties, be afforded an adequate opportunity to be involved in the early stages of the plan development and update process.”

It should be noted that neither the City and County nor its consultants have included E Noa in the preparation of the Alternatives Analysis. There was no response from the City and County to E Noa’s letter of January 7, 2006, outlining the federal requirements and offering to work with the City in the planning process. There was a single meeting of E Noa and Department of Transportation Services officials, initiated by E Noa, on February 27, 2006, at which E Noa described the relevant federal laws, regulations, and circulars relating to public agencies and private providers of transit services, as discussed above, and outlined some of the potential opportunities for public-private partnerships in the area of transit. There was no follow-up by the City and County or its consultants to this initiative on E Noa’s part.

Clearly, it is obligatory upon applicants for and recipients of federal funding to avoid damaging private providers of public transportation services financially and otherwise. Even more importantly, the applicants for and recipients of federal transit funding should vigorously look for opportunities to creative cooperative arrangements with private transportation companies that provide regular transit service to residents as well as visitors in order to furnish more comprehensive and cost-effective services to the public.

“Leave All This to Later”

Both the spoken and unspoken attitude of the City and County appear to be to leave all discussions of public-private partnerships with respect to transit services to some future date and to substantially ignore the legal requirements for the participation in the planning process of private transportation carriers providing regularly

scheduled service to the public, such as E Noa, to some future date, if at all.¹

This "do it later, if at all" approach makes no sense. First of all, the time to include private transportation carriers, providing regularly scheduled service to the public, in the planning process is when the planning is occurring, such as in the preparation of the draft EIS. It is important to note that simply providing a statement at a public information meeting is not the kind of participation envisioned by federal law.

Second, the prior "Alternative Analysis" and the present EIS are the planning documents in which the City and County sets forth its basic approach to providing transportation services in the Honolulu High-Capacity Corridor. If there is no substantive discussion of the potential for developing public-private partnerships with private transportation carriers providing regularly scheduled service to the public in these fundamental planning documents, then the likelihood of such partnerships being considered as essential elements in the planning program, either in the present or the future, is minimal. They might be a nice add-on, but they are not part and parcel of the philosophy underlying the planning of the new transit system.

In Conclusion

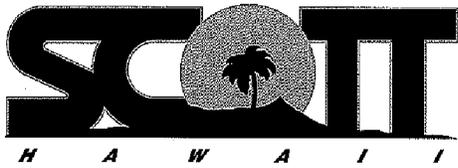
"The Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement/Section 4(f) Evaluation" is deficient in the following respects:

1. The failure to include private transportation carriers providing regularly scheduled service to the public in the planning process;

¹ "Opportunities for public-private partnership to enhance the project that can be delivered with limited public funds" is listed on page S-7 of the Alternatives Analysis as an issue to be resolved later. From the context of the statement, it is not possible to tell whether the Alternatives Analysis is referring to public-private partnerships in relation to construction and/or operation of the rail system, transit oriented development, or reduction of the modal splits by utilizing private transportation companies providing regularly schedules transit services.

2. The failure to recognize the relevance of federal statutes and regulations relating to private transportation carriers providing public service and to public-private partnerships; and
3. The failure to address the possibility of public-private partnership with private transportation carriers providing regularly scheduled service to the public as a means for improving the efficiency and effectiveness of the transportation service proposed for the high density corridor.

We reiterate the willingness of E Noa Corporation, an existing private provider of regularly scheduled public transportation services serving both residents and visitors, to work closely with the City and County of Honolulu and its consultants in the development of a public-private partnership that will contribute significantly to the success of the proposed transit system.



298464

January 30, 2009

Mr. Wayne Yoshioka
Department of Transportation Services
City and County of Honolulu
650 So. King St., 3rd Floor
Honolulu, HI 96813

Mr. Ted Matley
U.S. Department of Transportation
Federal Transit Administration - Region IX
201 Mission St., 3rd Floor
San Francisco, CA 94105

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TRANSPORTATION SERVICES

Re: Draft Environmental Impact Statement for Proposed Mass Transit

Messrs. Yoshioka and Matley:

As an owner of property and a business at 1212 Kona St. in Central Kakaako, it is apparent that the Honolulu High Capacity Transit will have a very direct and substantial impact on our immediate area, and greatly influence our ability to continue operating at this location. There are four areas where the DEIS has insufficient information regarding the impact to our business and the Kakaako community:

1. The impact of Mass Transit on the narrow streets in Central Kakaako, specifically Halekauwila St. and Kona St.
2. The design flaw which is referred to in the DEIS as the "third rail", which will "eventually" go over Ala Moana Shopping Center and connect to the University of Hawaii Manoa and Waikiki.
3. Mass Transit displacing many small light industrial businesses in Kakaako that ultimately will not be able to find a replacement location to service their current customer base.
4. The cost of the Honolulu High Capacity Transit and the City and County of Honolulu's ability to properly fund and pay for building and operations in the current financial situation.

1. Kona St., at 40' wide between Piikoi and Pensacola St, and Halekauwila St. at 50' wide, will be dramatically impacted during construction and after completion of the Honolulu High Capacity Transit. None of this is addressed completely in the DEIS.

There will be a loss of parking, especially on Kona St., to accommodate the bridge supports rather than a center column, and access to our building will be blocked. Kona St. between Piikoi and Pensacola, will also be adversely affected by the possible "third rail" that will need to be planned for with wider column supports during the initial construction, necessitating a wider footprint and additional property acquisitions. This was not made public until after the election to approve Mass Transit.

Kona St. is the main access for cars to go from Ala Moana to the Ward area, and building the rail down Kona St. would make an already stressed situation even worse. What will the City do to alleviate this problem during and after construction? Access to our building and others on Kona St. is already a problem with the current level of traffic on one of Kakaako's narrowest streets, a problem that has not been addressed in the DEIS. Relocating the route to Kapiolani Blvd. would clean up what is now a circuitous route through a highly dense Central Kakaako and lessen the impact to an already stressed infrastructure.

2. Prior to the election in 2008, the City and County of Honolulu proudly proclaimed that the Honolulu High Capacity Transit would go from Kapolei to the University of Hawaii Manoa and with a spur to Waikiki. There was never a mention of the line stopping at the Ala Moana Shopping Center with a station 40' high, and a single third rail eventually being built to do a flyover of the Nordstrom extension at the Mall at 100' high, continuing past the center. The DEIS does not address how the city plans on accomplishing this with a station at 40' and another at 100'. How will riders make the transfer? How will the rail cars wind their way past the shopping center through the various high rise buildings past Nordstrom toward Waikiki? Is the 5% grade the train will have to climb from Pensacola to the station at Nordstrom too steep? What will be the effect regarding noise for those businesses and condos in the immediate area?

This is a fatal design flaw that could be addressed with a route change to Kapiolani Blvd. if the City and County of Honolulu truly wanted to go to the University of Hawaii Manoa and Waikiki, something the voters thought they would be getting with a vote for rail.

3. Kakaako is the last light industrial area in Central Honolulu, home to thousands of small businesses serving the main population center of the City and County of Honolulu. This is where most of the displaced properties will come from if rail is built and if there is no route change. What will be the steps the City takes to mitigate the effect on those businesses to relocate elsewhere? Where will the customers that frequent these businesses go if rail goes through Central Kakaako? Is the current infrastructure adequate to accommodate the proposed transit oriented development the City wants to implement should rail become a reality?

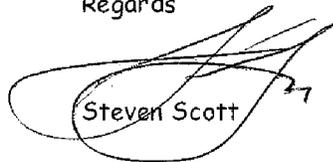
Who will pay for the improvements to the infrastructure when Kakaako is currently mostly unimproved? What is the position of the City and County of Honolulu vis a vis the HCDA, which controls Kakaako Mauka for the State when it comes to improvements and zoning? This should be spelled out in the DEIS and is not. A change of route to Kapiolani Blvd. or King St. would make more sense, preserving the Central Kakaako area to serve the residents of Honolulu.

4. Considering the current economic situation the City and County of Honolulu is in with a shrinking property tax base and declining revenue from the General Excise Tax, how will this Honolulu High Capacity Transit be paid for and operated? There will never be sufficient passengers of rail to pay for its operation, as well as continuing to operate the bus that would be required as a feeder for the rail line. Can the City and County of Honolulu depend on the federal government to continue to cover any shortage in operating costs? Has the City been open about the necessity for a property tax increase to pay for the added costs, and how accurate are the City's projections to operate rail? The General Excise Tax income is set to run out in 2022, and the revenue stream is currently under projections and shrinking each month with the economic downturn in Hawaii, where will the City makeup this shortage? Was this economic downturn anticipated in the DEIS, and shouldn't the City be required to address this in a supplemental DEIS prior to startup?

Will the State of Hawaii's new plans for traffic mitigation on the H1 freeway going east to reduce the bottleneck at Middle Street, and the plans to have a flyover on Nimitz Hwy affect rider ship for the Honolulu High Capacity Transit and thus impact toll box revenue? Will this make obsolete the figures on usage the City used in the current DEIS, and thus change the feasibility of Mass Transit for Honolulu?

The only solution is to have a supplemental draft environmental impact statement that would address these and many other concerns and questions regarding the feasibility of Mass Transit for Honolulu. The current DEIS is so vague on so many issues, and the City's lack of timely disclosures makes it difficult to understand the feasibility for a project of this magnitude in the City and County of Honolulu. Also, it is disingenuous for the City to place any credence in the vote to approve rail when it was not open about the specifics of the rail plan until after the election. Had the voters known about these four issues and others would it still have been approved?

Regards


Steven Scott

298462

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

February 4, 2009

RECEIVED
001 FEB 5 11:23 AM
DIRECTOR (FBIHQ)
DIVISION OF TRANSPORTATION SERVICES

Dear Mr. Yoshioka,

The Draft Environmental Impact Statement – (DEIS) – of the City’s proposed rail system is incomplete.

Before the public can make an informed decision about this project, they must have a point-by-point comparison of the possible transportation systems.

Your transportation team spent time mentioning the “Do Nothing” choice. In reality, “Doing Nothing” will never be a choice. The leeward coast needs relief.

The public was given the opportunity to vote whether they wanted rail or not, but they were not provided information to compare the systems in order to make an informed decision. Only Rail was advertised, - for months -, at public expense.

Colorful T.V. ads paid by the tax payers were at best 50% right. Your consultants were paid big dollars to push the Mayor’s choice. At community meetings you only presented the rail project, - nothing about possible alternatives. The “Go Rail” team came to neighborhood meetings and presented the Mayor’s message, but they couldn’t or wouldn’t answer the questions.

In the beginning of the rail discussion, the League of Women Voters secured one hour of T.V. time for a round-table discussion on transportation, but the City refused to participate. Rick Hamada provided time on his Monday morning program for discussion on the transportation issue, but after several programs, the City’s team refused to participate.

During the Primary, the Mayor participated in only one community candidate forum. It showed that Panos Prevedouros presented many concerns to the Mayor’s project. If the rail project is so right for Oahu, the Mayor’s team and the Mayor should have been able to discuss the project and answer all community questions in detail. They refused to do so.

Another huge concern of this project is the cost. I don’t think you can possibly know what the cost will be?, especially since major changes are being made weekly. The cost could end up being more than the City of Honolulu, the County of Oahu can afford. When we add up all the basic infrastructure projects that must be of priority, this rail project at \$5 BILLION plus is too costly for tax payers to handle. There are too many unknowns. Infact the Mayor was just in Washington D.C. with his hand out for Federal funds to pay for Oahu’s basic projects. We can’t afford this rail project now or maybe never, especially when we have alternative choices.

Professor Panos Prevedouros and his University students have presented a public report on transportation alternatives, but your team has ignored it.

There simply has not been an honest presentation of the financial and transportation impacts on Oahu.

I am very concerned that this DEIS does not fit our Hawaiian Sense of Place. We must step back and specifically compare all alternatives, -one to the other,- to be certain that we agree on a project that we can afford and that meets our needs.

CC: Mr. Ted Matley
CC: Gov. Linda Lingle
CC: Honolulu City Council

Eve G. Anderson
P.O. Box 25550
Honolulu, 96825
259-7706

TO: Department of Transportation Services
Mr. Wayne Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawai'i 96813

January 31, 2009

298450
09 FEB 5 12:34
RECEIVED
DIRECTOR'S OFFICE
DEPT. OF TRANSPORTATION SERVICES

FROM: Mr. Gary O'Donnell, Urban Designer
320 Liliuokalani Ave, Unit 2005
Honolulu, HI 96815

808 923-8107

SUBJECT: Comments on Honolulu High-Capacity Transit Corridor Project, Draft EIS

Thank you for all the time and effort that has gone into this precedent setting project. Overall I support this project. My comments are:

1. "Make no small plans." – *Frederick Law Olmstead, Landscape Architect for Central Park New York City, and World Columbian Exposition (The White City) Chicago, 1893.* My main concern with this project is not that it goes too far, but that it does not go far enough. Since a large part of our State's revenue is dependent on tourism, I support the Airport Route. We are going to look silly if we stop the rail just short of Waikiki at Ala Moana Shopping Center. Now is the time to build the rail to Waikiki and the University of Hawai'i (UH). Times of economic hardship are also times of economic opportunity, and rail transit is a chance to set Honolulu on a better course, which will pay back in many ways for years into the future. At the time Chicago was building the White City, our nation was headed into an economic downturn. The White City was a catalyst, full of new technology and aesthetic principles that invigorated our nation for decades into the 20th Century.
 - a. As someone who has traveled Nimitz Highway, the H-1 Freeway, and Dillingham Boulevard for most of 21 years, I can attest to the fact that traffic is lighter when UH is on break. Extending the rail transit project now to UH will ease traffic congestion and speak volumes about the value of education.
 - b. Having the rail go into Waikiki will provide an alternative means of travel for tourists and residents of Honolulu. Whether you are a resident celebrating a special occasion, or a member of the military looking for some rest and relaxation, being able to take rail transit as an alternative to driving in and out of our major entertainment district, Waikiki, is smart.
 - c. With the hundreds of billions of dollars our Federal government has been, and is, pouring into our Nation's economy, even if the Honolulu Rail Transit project were to double in cost, it will provide more value in our future than any other project.
2. Rail provides room for more commuters in less space and moves them faster. Moving 30 miles per hour is faster than driving 10 miles per hour or less in rush hour traffic. (I sometimes beat the number 19, 20, and 42 buses at rush hour on my bicycle and I am not a fast biker!)

Alternative projects are flawed.

 - a. Buses running east and west across the south side of O'ahu get caught in vehicular traffic. Mass transit that is grade separated provides a more efficient commute, such as the New York City subway that I always took uptown and downtown during my 3 years there.

Copy 1

1 of 6 PAGES

- b. Agree that rubber tires on pavement are not as efficient as steel wheels on steel rail – both energy wise and maintenance wise.
 - c. Elevated highways (no matter what you call them EZ-way, or Fly-way) pander to a false perception that you will have a shorter commute by getting closer to your destiny faster. In reality, you have to wait the same amount of time where the overhead freeway joins the other traffic. All the overhead freeway accomplishes is creation of the misperception that there is a shorter line of traffic, when in reality it is the same amount of traffic stacked, instead of spread-out long ways. Overhead freeways are also more visually intrusive in that they usually have a wide, low stance, creating a shadowy dungeon below, instead of a taller, narrower stance allowing sunlight below.
3. The Honolulu Rail transit should be thought of as a way to get to key points east and west on the south side of O'ahu, with a secondary on grade system providing transportation mauka-makai for those who cannot, or choose not to, walk a mile in a reasonable 20 minutes. The EIS should provide the proposed rearranged routes for the buses that connect at the transit stations.
- a. Passengers should be able to bring their bicycles on the train and continue to bring them on the bus. Passengers traveling to and from the airport should be able to carry one suitcase, a carry-on, and a personnel item.
 - b. In order to create additional width on the train without widening the structure, the parapet on either side of the track should be removed (if possible), which will create an even narrower appearance for the overhead track. The train cars should be widened to cantilever over the edge of the track. The sides of the cars should extend down over the steel wheels and rail to quiet the movement of the train (providing the appearance of a monorail type train).
 - c. The typical passenger train car design, which is over one hundred years old, should be re-thought. Instead of having masses of commuters entering and exiting the train through doorways that are not much larger than the doorway to someone's house, would it be possible to have the side of the train raise up (gull-wing, or a curved slide-up) to enable easy access and egress, and a piece drop down to cover the gap between the platform and the train. In this configuration seats would be placed in the middle allowing passengers to look out at the views over Honolulu as they pass by. The curved upper part of the train could have an energy efficient transparent material creating a sky and mountain view, giving an outward Art-Deco era motion appearance, like the Colorado Zephyr.
 - d. Center platform stations should be used where possible to minimize the width of the rail stations. Where stations can also provide an alternative means for pedestrians to cross streets near dangerous intersections, concessions stands should be leased in these stations to create an incentive for pedestrians to go up and back down, rather than cross at street level.
 - e. At busy rail stations where the stations cannot be built directly above or close to connections, a people mover should be provided to make the transition. Example: According to Figure 2-27, on page 2-30 the Airport Station appears to be on the other side of the airport parking garages from the front of the Airport terminal. Either locate the Airport Rail Station closer to the Airport Terminal (This avoids having to walk over a bridge through the garage area to get to the train) or install a people mover system to cover the distance across the bridge to the train.
 - f. Kuntz Gate on Elliot Street provides access to Hickam AFB for the number 19 Bus, pedestrians, and bicycle riders. A total number of 16,096 persons work on Hickam AFB, which includes military, civilians, and contractors. Recommend locating a rail

station near where the Airport Route crosses Elliot Street intersection with Nimitz Highway. A rail station at Elliot Street not only provides better access to Hickam AFB, but also provides better access to other facilities in this area, and to bus stops (sheltered by the Airport viaduct), and the popular bicycle path under the Airport viaduct. (Note: Appendix B, Drawing RW051, needs to show the intersection of Elliot Street and Nimitz Highway on the drawing.) An Elliot Street Station would also enable more frequent cycles of the number 19 Bus on Hickam AFB because the 19 Bus would not get caught in traffic around the Airport loop, or in traffic by the Pearl Harbor transit station should it be considered as an alternative transfer point.

4. Start construction of the rail transit system in the middle of the route at the Airport, and build outward in both east and west directions. This will get a difficult and important part of the rail system built first while tourism is in a downturn. It will enable more use of the rail system when the first parts of construction are complete. Tourists with a few hours between flights will be able to access the Arizona Memorial and Battleship Missouri (some of the most visited sites in Hawai'i). In the Diamond Head direction the rail would provide access between the Airport and Downtown Honolulu sooner than the proposed phasing of construction in this draft EIS
 - a. Lay down yards for materials to start construction in this area could be located at Keehi Lagoon Park. Alternative access for paddlers may have to be established during construction. After construction Keehi Lagoon Park can be restored into a beautiful new landscape. Alternative lay down areas that could be considered are: along Lagoon Drive near the eastside of the Airport; Shafter Flats; or possibly Kapalama Military Reservation (further away, but closer to where construction materials arrive by ship). The cost of rail construction should include money for revitalizing areas disturbed by construction. Thus, the rail project will have a double impact, not only providing alternative efficient transport, but also revitalizing areas in current need of improvement.
5. Downtown Honolulu rail route should be reconsidered.
 - a. Disruption of vehicular traffic during construction on Nimitz Highway is likely to cause major traffic delays. Example: On Oct. 30, 08 a truck got stuck in the middle of Alakea Street near the corner of Nimitz Highway during the evening rush hour. It backed-up traffic headed east on Nimitz all the way to Sand Island Road, because drivers had difficulty getting past vehicles waiting to turn Mauka on Alakea Street. The delay lasted about an hour till the truck was towed away.
 - b. Rail stations help stimulate real property development [Transit Oriented Development (TOD)]. The lower downtown area along the waterfront near Aloha Tower Market Place is already an attractive area. There is not much room for TOD in this area without displacing the sense of place that attracts business and visitors to this area. Downtown Honolulu has a good blend of new buildings and well maintained historic buildings. If the balance were to be tilted toward more new development the smaller historic buildings would be replaced, and the downtown would lose its visual rich culture, actually degrading the area rather than improving it. Similar to the relationship between Lower and Mid-town Manhattan, growth in Downtown Honolulu needs to move Mauka.
 - c. Security is also enhanced by routing the rail Mauka. Example: Around 2 PM on a sunny day in 1986 the Tsunami warning siren sounded. Commuters left their work for their homes, or places on higher ground, but before they could get where they wanted to go many had to travel east or west, and many took Nimitz Highway. Had the Tsunami occurred most commuters along Nimitz Highway probably would have been killed. The above grade rail transit provides a safer way to move east and west along the south side of O'ahu, provided it does not travel adjacent to the waterfront. During an on coming

- Tsunami people are encouraged to move to higher ground. Moving the rail Mauka would be an incentive for people to move Mauka. Otherwise there will be commuters walking to, and congregating at, the station on Nimitz Highway near Aloha Tower when a Tsunami warning siren sounds.
- d. Instead of traveling past Downtown Honolulu along the waterfront, the rail route should turn from Dillingham Boulevard onto Liliha and turn east onto Vineyard Boulevard. Accommodations should be made if some residents need to be displaced in the housing complex on the corner of Liliha and Vineyard. If this cannot be worked, then an alternative may be to turn Mauka from Dillingham Boulevard along the Kokea. I prefer the Liliha route because the station near Kaaahi could provide on grade access to the waterfront area of the downtown if an on grade connection could be made out to Nimitz Highway from where Kaaahi now deadends.
 - e. From Vineyard Boulevard consider routing the rail along Lusitania Street in back of Queen's Hospital and turning Makai in back of the Board of Water Supply down Alapa to South Street and from there either turn east along the present route on Halekauwii, or Queen Street, or Kapiolani Boulevard. Halekauwii provides better access to the Medical School, but Kapiolani route would create some synergy for pedestrians enabling them to cross dangerous intersections near Keeaumoku and near the Convention Center.
 - f. This Mauka route should allow for new mixed income TOD and back-up office space and business development. It also provides potential for alternative transit close to Queen's Hospital.
 - g. If the Kapiolani route were to be chosen the rail transit should enter Waikiki via Kalakaua Ave. If the Halekauwii route is utilized, the rail transit system should take the intended course into Waikiki. Either way, instead of going down Kuhio Ave, there should be a Rail Transit Station in Fort DeRussy with a transfer to an on grade bus route around Waikiki. From the Fort DeRussy Rail Transit Station the rail route should turn Mauka through Kalaimoku, cross the Ala Wai Canal and proceed up University Avenue to UH. This enables good access to Waikiki and UH with less disruption.
6. While planning for the completion of the Rail Transit System the State, City and County of Honolulu, the Federal government, and Hawaiians should consider the possibility of hosting a World's Fair in Hawai'i. The Fair could be Asian, Pacific oriented and focus on how multi-nations and cultures can come together to improve the Environment, Technology, Economy, and Cultural Appreciation. The Columbian Exposition of 1893 and the New York World's Fair of 1938 raised spirits, provided hope, and helped to spur economic recovery. Gauntlets can be thrown down to challenge individuals, businesses, and Nations to display new energy efficient ways to travel to the islands with incentive prizes going to category winners that combine efficiency with speed, and/or best traveling experience. Just as the White City was the focus of the Columbian Exposition, "Honolulu a Garden City Expo" would be the focus of our fair with our new rail system the transportation heart of the fair, connecting dis-contiguous diverse exhibits, conferences, and events.
- a. Example UH could hold conferences and exhibits on reinventing public education as a life long learning experience, so that school systems serve people of all ages in their communities. How do we do this economically? Maybe a four 10-hour day work week would provide one day per week, or even every other week, when people can volunteer in their community. Some volunteer work could be meeting at the local school, learning from each other and then applying what you learn.
 - b. A Medical Expo could be held near the transit station close to Queen's Hospital. Diet and exercise could be promoted as the means to long life without needing some of the

- futuristic medical procedures on display. Medical conferences could be held with the Medical Expo.
- c. Aloha Stadium could be revitalized as not only a place for spectator sport events, but also a place for learning and participating in sports. Our Capital District could host Government meetings. Defense agencies could host conferences and exhibits on creating a stable secure world.
 - d. Like Expo 67 in Montreal, Canada, a diverse group of architects could design exciting new buildings for the Fair, near transit stations. The best part is, because our fair is discontinuous, these exciting buildings near rail transit stations can be utilized after the fair is over, and be a catalyst for TOD. Some of the ground breaking architecture from Expo 67 were: the USA Pavilion, a Geodesic Sphere influenced by Bucky Fuller; the German Pavilion, a tension structure by Frei Otto; and Habitat, a futuristic vertical community of homes that gave each family a rooftop garden, by Moshe Safdie.
 - e. Because the fair is spread along the transit route, visitors stopping at the different transit stations and exhibits can dine in Honolulu's diverse local restaurants, and patronize local businesses, and Arts and Craft Fairs etc.
7. Why "Honolulu a Garden City Expo?" What is a "Garden City?" Why is rail transit key to initiating reform of our built environment into "Garden Cities"? How will this save and protect the Aina?
- a. Honolulu is uniquely positioned to become a model city to win the hearts and minds of Americans, and the International community, which can set a new course for the human environment around the globe. Hawai'i has natural resources to set a path toward energy independence. The Hawaiian culture provides a land use model for sustainability, where each community of the island gets a piece of diverse resources in each Ahupua'a. Our rail transit system will provide an energy efficient way of connecting these areas in Honolulu.
 - b. The term "Garden City" comes from Ebenezer Howard's book "Garden Cities of Tomorrow." Much like the Hawaiian Ahupua'a system "Garden Cities of Tomorrow" paints a vision of communities where each community has diverse land use. In Howard's vision, rail transit stations are near the gathering places of each community, and each rail station is in walking distance for most of the community. Small local farming occurs around the perimeter of each community, along with natural areas. Like Ebenezer Howard's "Garden Cities," rail transit is the most efficient way to join the various communities comprising Honolulu together.
 - c. In the evolution of cities around the world, we are at a turning point. For more than 100 years, success has been measured by rapid growth, accelerated by the industrial revolution. If we are to succeed in the next 100 years, success will be measured by sustainability and quality of life, rather than quantity of possessions consumed. The Interstate Highway system enabled rapid development of real estate to where extended suburbs (exurbs) have been built beyond the suburbs. We are at a point where the amount of roadway needed to be maintained and created for expanding populations will not improve quality of life. Rail transit is key to creating communities with improved quality of life and an efficient way of connecting communities. Creating quality communities around rail stations helps to save the Aina in much the same way the Ahupua'a system saved the Aina. Communities in walking distance to rail transit enable land outside walking distance to be transformed over time into gardens, small farms, recreation, and nature areas. Honolulu has the basic ingredients of a recipe to become a "Garden City." Other cities could follow by example. America could restore existing buildings and construct new buildings in areas like, Newark, N.J., South Chicago, and

Detroit, creating a rich diversity of architecture within the "Garden City" concept. These parts of America's inner cities deteriorated as development grew further away from the inner city over the last 50 years.

8. What if we create a situation where Hawai'i becomes so desirable that we have too many visitors, part time residents, and new residents for the islands to sustain?
 - a. Now that we are beyond the era where rapid growth can improve quality of life, and should be moving into an era where sustainable communities can improve quality life, part of maintaining quality of life for visitors and residents can be accomplished during the fair by declaring Hawai'i a State Park, and providing park passes (fair passes) to visitors and residents. This will enable a quality experience for all, and assure that Hawai'i continues to maintain an economic and cultural diversity of people.
 - b. "Honolulu a Garden City Expo" (with its new rail transit system) would be the focus of this proposed World's Fair - as a separate project, coinciding with the completion of the Honolulu rail transit system. However, the other islands could also choose to have coinciding exhibits and events. Example: the Big Island could feature some alternative energy solutions. The Big Island also has some State land from the former sugar plantation that perhaps Japan, for example, may want to show-off an exhibit based on its small local farms centered around a small village. Although industrial farming appears to provide less expensive products, the Japanese system of farming may be less expensive because it puts more people to work. This localized farming would also thematically tie into the "Honolulu Garden City Expo." It also raises the discussion as to whether the core of the economic downturn is in part caused by producing too many goods, too efficiently, resulting in an oversupply of products and people out of work, as happened in the Great Depression after the boom of the 1920s. The answer may be decentralization of industry, and purchasing goods for longevity. This also ties into the "Garden City" theme because some industry is part of the "Garden City," and some of this industry could be assembly and repair shops. Local industry would assemble quality products that could then be locally repaired, extending a products life, putting more people to work, and conserving resources for all.
9. In summary, we are not just creating an alternative mode of transportation, we are determining a quality of life for our future. We need to get synergy out of this transit project by looking at coinciding opportunities.



Gary O'Donnell
Urban Designer
808 923-8107



298449

RECEIVED
DIRECTOR'S OFFICE
DEPT. OF SERVICES
TRANSPORTATION SERVICES
09 FEB 5 P12:34

February 3, 2009

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

Dear Mr. Yoshioka,

Thank you for the opportunity to share our concerns and questions related to the Honolulu Rail Transit project and its potential effect on our business. We understand the complexities of such a massive undertaking and we hope our comments may assist the process.

While we have a number of stores along the proposed route, this letter is specific to our **Zippy's Dillingham** restaurant, located at **1210 Dillingham Boulevard**, within a shopping and business complex. We opened in July 1980 and serve the local community through our 24 hour restaurant, fast food operation and bakery. As you may know, over the years our establishment has become a favorite spot for residents, students and employees of businesses in Kapalama and its surrounding areas.

Our comments and concerns on the potential effects of the project are as follows.

1. **Impact of construction on our customer experience.** As our store sits on property immediately adjacent to Dillingham Boulevard and the proposed rail route, we anticipate being adversely affected by noise and dust, dewatering and excavation. We would appreciate information at least 90 days in advance on specific construction scheduling, including dates and time of day as well as proposed methods to minimize impact.
2. **Impact on traffic.** We have entrances off of Dillingham for Koko Head and Ewa bound traffic that are critical to our customer flow and must remain unobstructed throughout the process. We would also be concerned with any restriction of traffic flow Koko Head bound turning left from Dillingham Boulevard onto Kohou Street as well as vehicle and pedestrian access across the bridge over Kapalama Stream. As this thoroughfare is already heavily congested during early morning and mid afternoon hours, we expect that construction will further impede customer access to our store, extend our employees' commute and delay deliveries. Advanced information on proposed traffic flow during the various stages of construction would be beneficial.
3. **Street Upgrades.** With the opening of the stations, we foresee a need to improve the crosswalks across Dillingham Boulevard in consideration of the safety of increased pedestrian traffic moving to and from the station and the neighboring businesses. We are particularly concerned for the safety of our



employees and customers using the rail during evening and early morning periods when proper lighting is essential.

4. **Available Parking.** We understand that the Kapalama Station will include parking and unless adequate stalls are available, rail user parking may overflow into our shopping complex's lot. Specifics on the station, its parking capacity and overflow contingency plans would be appreciated.
5. **Store Visibility.** Dependent on the height of the rail and the placement of the support columns, we have concerns the visibility of our restaurant and its signage from the eastbound lanes and from across the street. We would be interested in how this circumstance might be addressed.
6. **RPT Considerations.** We would be interested in any adjustments the county is considering for real property taxes for those areas immediately impacted by construction and rail operation. In addition, we'd like to know what mechanisms might be instituted to require "pass through" of any related savings from landlord to tenant.

In general, timely communication of the final plans for construction and information on the operation of the rail transit system would be crucial for our store, our patrons and neighbors along the route. We intend to be proactive and prepare ourselves for the temporary disruptions brought by construction and more importantly to evolve our products and services as customer habits and the business landscape change with the introduction of rail service.

While we have listed our major concerns please be assured that we also appreciate the many benefits and opportunities development of rail transit will bring to our island. Please feel free to contact me directly if you require further clarification on any of the above.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul S. Yokota'.

Paul S. Yokota
Chief Operating Officer
FCH Enterprises, Inc.

cc: Kamehameha Schools and Bishop Estate



February 4, 2009

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

Dear Mr. Yoshioka,

Thank you for the opportunity to share our concerns and questions related to the Honolulu Rail Transit project and its potential effect on our business. We understand the complexities of such a massive undertaking and we hope our comments may assist the process.

While we have a number of stores along the proposed route, this letter is specific to our **Zippy's Pearlridge** restaurant, located at the **Pearlridge Center** on Kamehameha Highway, a major shopping and business complex. We opened in June 1986 and serve the local community through our fast food operation and bakery. As you may know, over the years Zippys has become a favorite spot for residents and employees of businesses in Pearl City and its surrounding areas.

Our comments and concerns on the potential effects of the project are as follows.

1. **Impact of construction on our customer experience.** As our store sits immediately adjacent to the highway, we anticipate being adversely affected by noise and dust, dewatering and excavation. We would appreciate information at least 90 days in advance on construction scheduling including dates and time of day as well as methods proposed to minimize impact.
2. **Impact on traffic during construction.** We would be concerned with any restriction of traffic flow Koko Head bound turning left from Kamehameha Highway onto Pali Momi Street which runs adjacent to the mall. The highway is already heavily congested during early morning and mid afternoon hours and we expect that construction will further impede customer access to our store, extend our employees' commute and delay deliveries. Advanced information on proposed traffic flow during the various stages of construction would be beneficial.
3. **Street Upgrades.** With the opening of the station, we foresee a need to improve the crosswalks across Kamehameha Highway in consideration of the safety of increased pedestrian traffic moving to and from the station and from the businesses on either side of the highway. We are particularly concerned for the safety of our employees and customers using the rail during evening and early morning periods when proper lighting is critical.



4. **Store Visibility.** Dependent on the height of the rail and the placement of the support columns, we are concerned of the visibility of our restaurant and its signage from the eastbound lanes and from across the highway. We would be interested in how this circumstance might be addressed.
5. **Available Parking.** We understand that there may be a private developer involved in the Pearlridge station and we'd be interested in the parking capacity and proposed inclusions in the facility. Should transportation be provided from the station to the mall, and if station parking is inadequate we anticipate passengers attempting to use mall parking facilities instead. We'd appreciate information on proposed overflow parking contingencies.
6. **RPT Considerations.** We would be interested in any adjustments the county is considering for real property taxes for those areas immediately impacted by construction. In addition, we'd like to know what mechanisms might be instituted to require "pass through" of any related savings from landlord to tenant.

In general, timely communication of the final plans for construction and information on the operation of the rail transit system would be crucial for our store, our patrons and neighbors along the route. We intend to be proactive and prepare ourselves for the temporary disruptions brought by construction, and more importantly to evolve our products and services as customer habits and the business landscape change with the introduction of rail service.

While we have listed our major concerns, please be assured that we also appreciate the many benefits and opportunities development of rail transit will bring to our island. Please feel free to contact me directly if you require further clarification on any of the above.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul S. Yokota', written in a cursive style.

Paul S. Yokota
Chief Operating Officer



February 3, 2009

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

Dear Mr. Yoshioka,

Thank you for the opportunity to express our concerns and questions related to the Honolulu Rail Transit project and its potential effect on our business. We understand the complexities of such a massive undertaking and we hope our comments may assist the process.

While we have a number of stores along the proposed route, this letter is specific to our **Zippy's Waimalu** restaurant, located at **98048 Kamehameha Highway**, adjacent to a shopping and business complex. We opened in April 1972 and we serve the local community through our 24 hour fast food operation and bakery. As you may know, over the years Zippys has become a favorite spot for residents and employees of businesses in Pearl City and its surrounding areas.

Our comments and concerns on the potential effects of the project are as follows.

1. **Impact of construction on our customer experience.** As our store sits immediately adjacent to the highway, we anticipate being adversely affected by noise and dust, dewatering and excavation. We would appreciate information at least 90 days in advance on specific construction schedules, including dates and time of day as well as methods proposed to minimize impact.
2. **Impact on traffic during construction.** We would be concerned with any restriction of traffic flow Koko Head bound turning left from Kamehameha Highway onto Kanuku Street which runs adjacent to our store. We also have a right turn entrance off the highway westbound that is critical to our customer traffic and must remain unobstructed throughout the process. As the highway is already heavily congested during early morning and mid afternoon hours we expect that construction will further impede customer access to our store, extend our employees' commute and delay deliveries. Advanced information on proposed traffic flow during the various stages of construction would be beneficial.
3. **Street Upgrades.** With the opening of the station, we foresee a need to improve the crosswalks across Kamehameha Highway specifically at Kanuku Street in consideration of the safety of increased pedestrian traffic moving to and from the station and from the businesses on either side of the highway. We are



particularly concerned for the safety of our employees and customers using the rail during evening and early morning periods when proper lighting is critical.

4. **Store Visibility.** Dependent on the height of the rail and the placement of the support columns we are concerned of the visibility of our restaurant and its signage from the eastbound lanes and from across the highway. We would be interested in how this circumstance might be addressed.
5. **Available Parking.** We understand that there may be a private developer involved in the Pearlridge station and we'd be interested in the parking requirements as well as the capacity and proposed inclusions in the facility.
6. **RPT Considerations.** We would be interested in any adjustments the county is considering for real property taxes for those areas immediately impacted by construction. In addition, we'd like to know what mechanisms might be instituted to require "pass through" of any related savings from landlord to tenant.

In general, timely communication of the final plans for construction and information on the operation of the rail transit system would be crucial for our store, our patrons and neighbors along the route. We intend to be proactive and prepare ourselves for the temporary disruptions brought by construction and more importantly to evolve our products and services as customer habits and the business landscape change with the introduction of rail service.

While we have listed our major concerns, please be assured that we also appreciate the many benefits and opportunities development of rail transit will bring to our island. Please feel free to contact me directly if you require further clarification on any of the above.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul S. Yokota', written in a cursive style.

Paul S. Yokota
Chief Operating Officer

cc: Kanataki Estate



February 3, 2009

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

Dear Mr. Yoshioka,

Thank you for the opportunity to express our concerns and questions related to the Honolulu Rail Transit project and its potential effect on our business. We understand the complexities of such a massive undertaking and we hope our comments may assist the process.

While we have a number of stores along the proposed route, this letter is specific to our **Zippy's Waiau** restaurant, located at **450 Kamehameha Highway**, in a shopping and business complex. We opened in November 1978 and we serve the local community through our 24 hour fast food operation, restaurant and bakery. As you may know, over the years Zippys has become a favorite gathering spot for residents and employees of businesses in Pearl City and its surrounding areas.

Our comments and concerns on the potential effects of the project are as follows.

1. **Impact of construction on our customer experience.** As our store sits immediately adjacent to the highway, we anticipate being adversely affected by noise and dust, dewatering and excavation. We would appreciate information at least 90 days in advance on specific construction scheduling including dates and time of day as well as methods proposed to minimize impact.
2. **Impact on traffic during construction.** We would be concerned with any restriction temporary or permanent of the u-turn access both Ewa and Koko Head bound through the medial strip on Kamehameha Highway in the store's immediate vicinity. Our main entrance is a right turn off of the highway, Ewa bound which must remain unobstructed throughout the process. As the highway is already heavily congested during early morning and mid afternoon hours, we expect that construction will further impede customer access to our store, extend our employees' commute and delay deliveries. Advanced information on proposed traffic flow during the various stages of construction would be beneficial.
3. **Street Upgrades.** With the opening of the station, we foresee a need to improve the crosswalks across Kamehameha Highway in consideration of the safety of increased pedestrian traffic moving to and from the station landings. We are particularly concerned for the safety of our employees and customers using the rail during evening and early morning periods when proper lighting is critical.



4. **Store Visibility.** Dependent on the height of the rail and the placement of the support columns we are concerned of the visibility of our restaurant and its signage from the eastbound lanes and from across the highway. We would be interested in how this circumstance might be addressed.
5. **RPT Considerations.** We would be interested in any adjustments the county is considering for real property taxes for those areas immediately impacted by construction. In addition, we'd like to know what mechanisms might be instituted to require "pass through" of any related savings from landlord to tenant.

In general, timely communication of the final plans for construction and information on the operation of the rail transit system would be crucial for our store, our patrons and neighbors along the route. We intend to be proactive and prepare ourselves for the temporary disruptions brought by construction, and more importantly to evolve our products and services as customer habits and the business landscape change with the introduction of rail service.

While we have listed our major concerns, please be assured that we also appreciate the many benefits and opportunities development of rail transit will bring to our island. Please feel free to contact me directly if you require further clarification on any of the above.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul S. Yokota', written in a cursive style.

Paul S. Yokota
Chief Operating Officer



February 3, 2009

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

Dear Mr. Yoshioka,

Thank you for the opportunity to express our concerns and questions related to the Honolulu Rail Transit project and its potential effect on our business. We understand the complexities of such a massive undertaking and we hope our comments may assist the process.

While we have a number of stores along the proposed route, this letter is specific to our **Zippy's Pearl City** restaurant, located at **806 Kamehameha Highway**, adjacent to a shopping and business complex. We opened in June 1986 and we serve the local community through our 24 hour fast food operation, restaurant and bakery. As you may know, over the years Zippys has become a favorite gathering spot for residents and employees of businesses in Pearl City and its surrounding areas.

Our comments and concerns on the potential effects of the project are as follows.

1. **Impact of construction on our customer experience.** As our store sits immediately adjacent to the highway, we anticipate being adversely affected by noise and dust, dewatering and excavation. We would appreciate specific information at least 90 days in advance on specific construction scheduling including dates and time of day as well as methods proposed to minimize impact.
2. **Impact on traffic during construction.** We would be concerned with any restriction of traffic flow Koko Head bound turning left from Kamehameha Highway onto Puu Momi Street which serves our complex. We also have a right turn entrance off the highway Ewa bound that is critical to our customer traffic and must remain unobstructed throughout the process. The highway is already heavily congested during early morning and mid afternoon hours and we expect that construction will further impede customer access to our store, extend our employees' commute and delay deliveries. Advanced information on proposed traffic flow during the various stages of construction would be beneficial.
3. **Street Upgrades.** With the opening of the stations, we foresee a need to improve the crosswalks across Kamehameha Highway in consideration of the safety of increased pedestrian traffic moving to and from the station landings. We are particularly concerned for the safety of our employees and customers using the rail during evening and early morning periods when proper lighting is critical.



4. **Store Visibility.** Dependent on the height of the rail and the placement of the support columns, we are concerned of the visibility of our restaurant and its signage from the eastbound lanes and from across the highway. We would be interested in how this circumstance might be addressed.
5. **RPT Considerations.** We would be interested in any adjustments the county is considering for real property taxes for those areas immediately impacted by construction. In addition, we'd like to know what mechanisms might be instituted to require "pass through" of any related savings from landlord to tenant.

In general, timely communication of the final plans for construction and information on the operation of the rail transit system would be crucial for our store, our patrons and neighbors along the route. We intend to be proactive and prepare ourselves for the temporary disruptions brought by construction, and more importantly to evolve our products and services as customer habits and the business landscape change with the introduction of rail service.

While we have listed our major concerns, please be assured that we also appreciate the many benefits and opportunities development of rail transit will bring to our island. Please feel free to contact me directly if you require further clarification on any of the above.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul S. Yokota', written in a cursive style.

Paul S. Yokota
Chief Operating Officer
FCH Enterprises, Inc.

cc: Weinberg Estate



February 3, 2009

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

Dear Mr. Yoshioka,

Thank you for the opportunity to share our concerns and questions related to the Honolulu Rail Transit project and its potential effect on our business. We understand the complexities of such a massive undertaking and we hope our comments may assist the process.

While we have a number of stores along the proposed route this, letter is specific to our **Zippy's Waipahu** restaurant, located at **94-180 Farrington Highway**, on the southeast corner of a shopping and business complex. We opened in April 1971, renovated in 2009 and we serve the local community through our 24 hour fast food operation, restaurant and bakery. As you may know, over the years Zippys has become a favorite gathering spot for residents and employees of businesses in Waipahu and its surrounding areas.

Our comments and concerns on the potential effects of the project are as follows.

1. **Impact of construction on our customer experience.** As our store sits immediately adjacent to the highway, we anticipate being adversely affected by noise and dust, dewatering and excavation. We would appreciate specific information at least 90 days in advance on specific construction scheduling including dates and time of day as well as methods proposed to minimize impact.
2. **Impact on traffic during construction.** We would be concerned with any restriction of traffic flow Koko Head bound turning left from Farrington Highway onto Leoku Street which serves our complex. Our store is also directly accessed through a right turn entrance off of the highway, Ewa bound which is our main entrance and must remain unobstructed throughout the process. The highway is already heavily congested during early morning and mid afternoon hours and we expect that construction will further impede customer access to our store, extend our employees' commute and delay deliveries. Advanced information on proposed traffic flow during the various stages of construction would be beneficial.
3. **Availability of parking.** We understand that the Waipahu station will include parking on the makai side of Farrington Highway which is currently occupied by a car lot. We are concerned that unless adequate stalls are available, rail passengers are likely to overflow into our complex's parking lot. Westbound rail



passengers in particular, ^{R E S T A U R A N T S}would be likely to attempt this as the step down for the elevated station lands on our side of the highway. Specifics on the station and its parking capacity and overflow contingency plans would be appreciated.

4. **Street Upgrades.** With the opening of the station, we foresee a need to improve the crosswalks across Farrington Highway, particularly those closest to the Leoku Street in consideration for the safety of increased pedestrian traffic moving to and from the station landings. Employees in the area and customers using the rail will also increase the traffic on these crosswalks.
5. **Store Visibility.** Dependent on the height of the rail and the placement of the support columns, we are concerned of the visibility of our restaurant and its signage from the eastbound lanes and from across the highway. We would be interested in how this circumstance may be addressed.
6. **RPT Considerations.** We would be interested in any adjustments the county is considering for real property taxes for those areas immediately impacted by construction. In addition, we'd like to know what mechanisms might be instituted to require "pass through" of any related savings from landlord to tenant.

In general, timely communication of the final plans for construction and information on the operation of the rail transit system would be crucial for our store, our patrons and neighbors along the route. We intend to be proactive and prepare ourselves for the temporary disruptions brought by construction, and more importantly to evolve our products and services as customer habits and the business landscape change with the introduction of rail service.

While we have listed our major concerns, please be assured that we also appreciate the many benefits and opportunities development of rail transit will bring to our island. Please feel free to contact me directly if you require further clarification on any of the above.

Sincerely,

Paul S. Yokota
Chief Operating Officer

cc: Robinson Estate



PACIFIC GUARDIAN CENTER

PACIFIC GUARDIAN CENTER ASSET MANAGEMENT OFFICE
737 BISHOP STREET, SUITE 1600 • HONOLULU, HAWAII 96813 • TEL (808) 942-1351 • FAX (808) 942-6589

January 30, 2009

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

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

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DIRECTOR'S OFFICE
GENERAL SERVICES
TRANSPORTATION SERVICES
FEB 5 12:35

Subject: Draft Environmental Impact Statement Review Comments for the Honolulu High-Capacity Transit Corridor Project

Dear Messrs. Matley and Yoshioka:

Pacific Guardian Center (PGC) supports the City's concept of a steel-on-steel rail fixed guideway system as an integral means of connecting our island communities. Because PGC is located along the proposed transit route and will be directly impacted by the project, we welcome this opportunity to comment on the Draft Environmental Impact Statement (DEIS) dated November 2008.

Existing Conditions

Pacific Guardian Center (PGC) is located within Honolulu's Central Business District, and the property is bounded by Bishop, Alakea, and Queen Streets, and Nimitz Highway. The property consists of the low-rise historic Dillingham Transportation Building (DTB), a pedestrian plaza, and two high-rise office towers (Mauka and Makai Towers) with a multi-level parking structure at the lower floors.

As noted in the DEIS, the DTB is listed on the Hawaii Register of Historic Places, and "*retains a high level of integrity, as the only major changes involve the creation of first-floor storefronts and two arcades by removal of some of the store spaces to provide Bishop Street access and address for the circa-1980 Pacific Guardian Center towers.*"¹ It should be noted that this remarkable historic and architectural integrity is possible primarily because the pedestrian plaza serves as both a buffer from and a connection to the more recent Mauka and Makai towers.

The existing plaza consists of pedestrian circulation, outdoor seating, and open gathering areas defined by generously planted trees and landscaping. Tenants and visitors alike regularly enjoy this outdoor space for meals, informal meetings, work breaks, or while waiting for others. The plaza also provides a convenient venue for private daytime or evening events and programs. In short, this gathering place is a well-used and desirable tenant amenity. The plaza also serves as the primary pedestrian entry path for both the Mauka and Makai towers. Since on-site parking is housed within the base of the towers, many DTB tenants also access the DTB via the plaza. In addition, the water feature at the makai end of the plaza currently houses the DTB's only common trash enclosure. This water feature serves to screen off views of the roadway and masks traffic noise.

Proposed Changes

According to preliminary information provided by the City, our understanding is that the proposed Downtown Station platform along Nimitz Highway between Bishop and Alakea Streets will rise approximately 40 feet above grade and that the overhead canopy structure will be more than 55 feet tall. We also understand that the station platform will span a width of approximately 50 feet and that connecting stair concourses will extend that overhead coverage to nearly 80 feet. We also understand that approximately 2,400 sq ft of the plaza between PGC and DTB would be appropriated for the mauka Downtown Station entrance along Nimitz Highway. During transit system operating hours of 4 a.m. to midnight, trains would arrive every 3 to 10 minutes.²

Impacts to Dillingham Transportation Building, Pacific Guardian Center, and Plaza

We are therefore concerned that the location, size, and bulk of the proposed elevated guideway and Downtown Station as well as the large passenger volume will have significant and detrimental impacts to the DTB, PGC, and their respective tenants.

Although approximately 2,400 sq ft of the existing plaza is proposed to be appropriated for the new Downtown Station entrance, we respectfully disagree with the assertion that the Downtown Station entrance "would not eliminate the open space or alter its use."³ According to the Draft EIS, the Downtown Station will be the primary destination for downtown Honolulu commuters and is projected to accommodate over 2,500 passengers within the 2 hour peak morning and evening hours and over 6,000 passengers are expected per day.⁴

The natural desire for convenience suggests that the majority of passengers will rely heavily upon the mauka station entrance as this offers a far more expedient access to the Central Business District than the station entrance on the makai side of Nimitz Highway. Our understanding is that this large volume of people passing in and out of the mauka station entrance will also require a significantly larger bulk and footprint than is proposed in order to provide adequately-sized stair, escalator, and elevator access. Furthermore, the remainder of the entire plaza will likely need to be forfeited and completely redesigned to properly accommodate this large flow of public pedestrian traffic. Corresponding increases in PGC's on-site security as well as operations and maintenance will be necessary. We are therefore deeply concerned that the open space of the plaza will be significantly reduced by a larger station entrance and that the use of the plaza will be changed from a private, tenant amenity to a public thoroughfare. We are also concerned that there is no available alternative location on the property for the displaced DTB trash enclosure.

While we sincerely appreciate the City's efforts to avoid locating the Downtown Station platform directly opposite to the historic DTB, it should be noted that the elevated guideway structure still remains approximately 40 feet from the DTB's Nimitz Highway façade, and the ewa end of the station is only 30-40 feet away from makai-Diamond Head corner of the building. This proximity of the elevated guideway structure and its supporting columns will block DTB tenants' makai views "from fourth and fifth-story windows"⁵ and significantly diminish the economic value of these spaces. In addition, although the Draft EIS lists ground level noise readings near the Downtown Station, no projected noise exposure levels are provided for upper floor levels.⁶ Since the proposed noise mitigation measures rely primarily on raised parapet walls along the edges of the guideway to direct upward and away from the ground, we are concerned that the noise of trains regularly passing immediately adjacent to the DTB and PGC will disturb and interrupt upper floor businesses and make it further difficult to attract and retain tenants in the affected spaces. We have similar concerns regarding detrimental impacts to tenants because "trains traveling on the guideway would create light and glare, and the Chinatown and Downtown stations would increase this effect."⁷

Although the several lanes of vehicular traffic along Nimitz Highway tend to discourage easy pedestrian travel between Downtown Honolulu and Honolulu Harbor, the proximity of DTB and PGC to Aloha Tower Marketplace and its views of and from Honolulu Harbor remain highly attractive features of the property. We are therefore concerned that the location, size, and bulk of the elevated guideway and station structures will only further visually and physically isolate our

property from the Aloha Tower Marketplace and considerably diminish its connection with the waterfront. Because *"the addition of the guideway and columns would change the visual character of the streetscape and substantially affect the visual setting of the Dillingham Transportation Building and Irwin Park,"*⁸ our fear is that the pedestrian environment along our property's Nimitz boundary will be significantly degraded.

We also remain doubtful of the City's assertion that the *"the project would cross, but not block, views along...protected mauka-makai street view corridors"*⁹ when immediately following this the DEIS states that *"the guideway and columns would be dominant elements in makai views between Nimitz Highway and Queen Street, and views of the horizon would be partially blocked."*¹⁰ Also contributing to our misgivings is the disclosure that *"the guideway and columns would reduce the open character of the streetscape, create shade and shadows, and block portions of makai views along...Bishop [Street]."*¹¹

Recommendations

It is our understanding that compared to at-grade transit solutions, elevated systems require inherently larger station structures to accommodate necessary elevators, escalators, and stairs as well as connecting walkways and concourses. Despite being placed overhead, this larger overall bulk would seem to reduce the City's flexibility in planning suitable station and route locations in historic, visually-sensitive, and pedestrian-oriented districts.

We therefore strongly urge the City to consider implementing an at-grade, overhead wire light-rail transit system similar to popular systems in Portland, Denver, and Salt Lake City. Such technology would allow the transit system to safely operate at-grade along the transit corridor and to be elevated above-grade when required by local site conditions. We strongly suspect that this would offer the City increased flexibility in planning station and route locations and minimize the associated negative impacts along the transit route.

It is also our opinion that the Downtown Station should ideally be one of the most noteworthy transit stations by virtue of its high passenger volume and its anticipated role as the primary gateway to and from the Central Business District. This station's civic prominence also suggests that it should be located along a gracious, public pedestrian thoroughfare. In contrast, the proposed Downtown Station entrance between the DTB and PGC appears to be the smallest along the transit route especially when compared with stations of comparable or lesser ridership. The Draft EIS confirms that it *"would be the highest volume station in the system without an associated transit center."*¹² The proposed station entrance location also challenges pedestrians with a less obvious and less direct path. Passengers must either navigate around or through the DTB to access the primary mauka station entrance.

We therefore strongly urge the City to consider incorporating an at-grade Downtown Station into the TOPA Tower complex located between Bishop Street and Fort Street. Fort Street Mall is already a prominent existing public pedestrian thoroughfare, and it would provide a clear and direct user connection to the transit system because it runs straight through the core of the Central Business District from the Aloha Tower waterfront all the way to Beretania Street. While we appreciate that the DEIS considers Fort Street as an alternative, we respectfully disagree with the reasoning that a reduction of the rail's curve radius *"would result in increased travel time and a substantial decrease in user benefits."*¹³ When approaching or departing from the Downtown Station, trains will naturally need to decelerate or accelerate from a stop, regardless of being located near a curve or not. Therefore, slower train speeds near the Downtown Station should already be expected as part of normal operations, and rail curvature would not appear to be a relevant limiting factor in this case. Furthermore, an at-grade Downtown Station at TOPA Tower and Fort Street Mall avoids historic and visual impacts to Irwin Memorial Park, Aloha Tower, and the area in general.

If the Downtown Station must be located within the PGC property, we recommend that the City consider incorporating the Downtown Station into the DTB instead of appropriating any portions

of the adjacent plaza, and we would be open to future discussions on how best to achieve this. In the meantime, we wish to point out that the DTB's first floor arcade could serve as a gracious station entrance and would more easily distribute heavy pedestrian traffic onto Bishop Street and perhaps Queen Street. In this way the Central Business District would be provided a more visible access point and an appropriately grander identity while conserving PGC's tenant use of the plaza. Incorporating the Downtown Station into the DTB would also offer a more cost effective alternative to the necessary acquisition of the entire plaza as a public thoroughfare. Adaptive reuse of the DTB could potentially allow the station spaces themselves to help buffer between passing trains and any remaining tenant areas. Finally, concealing much of the station structure within the DTB would result in significantly less visual impact to the area.

Pacific Guardian Center sincerely thanks the City and County of Honolulu for this opportunity to offer our comments and recommendations. We also appreciate the City's willingness to meet and update us on with preliminary plans and information regarding the Downtown Station.

Sincerely Yours,



H. Brian Moore
Vice President, Pacific Guardian Life
Asset Manager for Pacific Guardian Center

-
- ¹ Draft EIS, p. 5-28
 - ² Draft EIS, Table 2-5, p. 2-20
 - ³ Draft EIS, p. 5-29
 - ⁴ Draft EIS, Figures 3-10, 3-11, 3-12
 - ⁵ Draft EIS, p. 4-88
 - ⁶ Draft EIS, Figure 4-42
 - ⁷ Draft EIS, p. 4-88
 - ⁸ Draft EIS, p. 4-88
 - ⁹ Draft EIS, p. 4-89
 - ¹⁰ Draft EIS, p. 4-89
 - ¹¹ Draft EIS, p. 4-88
 - ¹² Draft EIS, p. 5-28
 - ¹³ Draft EIS, p. 5-34



DISABILITY AND COMMUNICATION ACCESS BOARD

919 Ala Moana Boulevard, Room 101 • Honolulu, Hawaii 96814
Ph. (808) 586-8121 (V/TDD) • Fax (808) 586-8129

February 6, 2009

RECEIVED
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DIRECTOR'S OFFICE
DEPT. OF SERVICE
TRANSPORTATION SERVICES

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

Regarding: Honolulu High-Capacity Transit Corridor Project
Draft Environmental Impact Statement/Section 4(f) Evaluation
November 2008

Dear Mr. Yoshioka,

The Disability and Communication Access Board would like to thank you for the opportunity to review the Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement/Section 4(f) Evaluation dated November 2008. The purpose of this review is to ensure that this project will take into account accessibility design requirements for persons with disabilities.

With respect to the Final Environmental Impact Statement, we recommend the following general statement should be included in the EIS/Section 4(f) Evaluation:

"All buildings, facilities, and sites shall conform to applicable federal, state, and county accessibility guidelines and standards. Hawaii Revised Statutes §103-50 requires all State of Hawaii or County government buildings, facilities, and sites to be designed and constructed to conform to the Architectural Barriers Act/Americans with Disabilities Act Accessibility Guidelines (36 CFR Parts 1190 and 1191) issued by the U.S. Access Board, and other applicable design standards as adopted and amended by the Disability and Communication Access Board. The law further requires all plans and specifications prepared for the construction of State of Hawaii or County government buildings, facilities, and sites to be reviewed by the Disability and Communication Access Board for conformance to those guidelines and standards."

The U.S. Department of Transportation, a major funding source for this project, has adopted and will enforce these design guidelines.

Mr. Wayne Y. Yoshioka

Re: Honolulu High-Capacity Transit Corridor Project, Draft Environmental Impact
Statement/Section 4(f) Evaluation, November 2008

February 6, 2009

Page 2

These comments are in addition to separate comments to your Department regarding the accessibility of the system (irrespective of the route taken) for persons with disabilities. The rail system will be a major transportation alternative for individuals with disabilities and it is critical that the design not only be minimally accessible to meet the requirements of the law but also take into account best practices for maximum usability and comfort to increase ridership.

Should you have any further questions, feel free to contact Mr. Curtis Motoyama, Facility Access Coordinator, or Mr. Gary Batcheller, Facility Access Specialist at 586-8121.

Sincerely,



FRANCINE WAI
Executive Director



UNIVERSITY
of HAWAII
SYSTEM

February 4, 2009

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

Subject: Comments on the Honolulu High-Capacity Transit Corridor Project - Draft EIS

Dear Mr. Yoshioka:

The University of Hawai'i continues to support the Honolulu High-Capacity Transit Corridor Project as being an integral part of the multi-modal transportation solution to serving the needs of the University campuses on O'ahu as well as the larger O'ahu community.

We thank you for the opportunity to provide the attached comments from three of our campuses, University of Hawai'i at Mānoa, Leeward Community College and Honolulu Community College. We look forward to working closely with your planning and design team in assuring that all of our O'ahu campuses are adequately served.

Sincerely,

Brian K. Minaai
Associate Vice President for Capital Improvements

Attachments

- c: Chancellor Virginia Hinshaw
- Vice Chancellor Kathy Cutshaw
- Chancellor Manny Cabral
- Vice Chancellor Mark Lane
- Chancellor Michael Rota
- Executive Assistant Brian Furuto

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 DIRECTOR'S OFFICE
 DEPT. OF
 TRANSPORTATION SERVICES



UNIVERSITY of HAWAII
LEEWARD
COMMUNITY COLLEGE

January 31, 2009

To: Brian Minaai, Associate Vice President for Capital Improvements

From: Mark Lane, Vice Chancellor of Administrative Services

Subject: Draft Environmental Impact Statement – Honolulu High-Capacity Transit Corridor Project (HHCTCP)

Leeward Community College (LCC) has reviewed the Draft Environmental Impact Statement (DEIS) for the Honolulu High-Capacity Transit Corridor Project (HHCTCP) and submits the attached comments for your inclusion in the formal response by the University of Hawaii to the City and County of Honolulu's Department of Transportation Services (DTS). We would like to preface our comments by voicing our continuing support for the HHCTCP as being an integral part of the multi-modal transportation solution for our island residents. All components of this project that impact Leeward Community College (LCC) can certainly be mitigated. We look forward to working with you as we pursue mutually acceptable solutions with DTS officials and others in order to address the needs of the College's students, faculty, staff, and community.

As you know, LCC is the third largest of the UH 10-campus system, with an enrollment of nearly 7,000 students. In addition, LCC is considered a regional community asset with special events and performances that draw in excess of 100,000 patrons per year. Yet the campus is accessible by one (1) ingress and egress point. This makes the health and safety of all campus visitors, whether students or community members, a top institutional priority. Adding more development to this area, such as a rail station and rail system maintenance and storage facility, on the limited roadway network that presently exists requires thoughtful consideration as there are direct impacts to the LCC campus. On balance however, we do believe that the HHCTCP, combined with the LCC Second Access Road project, offers opportunities that would help remedy the campus access issue for the foreseeable future.

For your information, the campus continues on-going dialogue with engineers and planners connected with the HHCTCP. Our next meeting with HHCTCP officials is scheduled for February 19th, from 1:30 to 3:30 on the LCC campus. I would like to extend an invitation to you, Mike Unebasami, and/or your designated representatives to attend this meeting. I will forward an agenda to you as soon as it is available.

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AR00057897

We respectfully submit these comments to you for inclusion in the UH response to the DEIS. Should you have any questions or require further clarification of our statements, please feel free to contact me at your convenience. Thank you, Brian.

cc: Manny Cabral, Chancellor Leeward CC
John Morton, Vice President, UHCC
Mike Unebasami, Associate Vice President, UHCC
Brian Kashiwaeda, Director of Facilities Planning, UHCC
Kay Caldwell, Campus Council Chair, Leeward CC
Linda Musto, Faculty Senate Chair, Leeward CC
Stu Uesato, Counselor and Student Government Advisor, Leeward CC

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**Draft Environmental Impact Statement (DEIS) Comments
Honolulu High-Capacity Transit Corridor Project (HHCTCP)**

1. Vehicle and Maintenance Storage Facility

The Navy Drum Storage site, located directly Ewa of the campus, is one of two possible locations for the project's vehicle and maintenance storage facility. It is likely that this site will be selected due to its central island location and rail accessibility points from both the Ewa and Koko Head directions. In addition, this site would be in the first phase of the construction schedule due to the fact that testing of the rail system could not be conducted without the completion and access to this facility. The vehicle and maintenance storage facility would include several buildings for administration, a system control center, and employ approximately 150 people. It would include tracks for train storage and maintenance and the facility would be in operation 24 hours a day.

At the present time, the only access to/from the site would be by way of Waiawa and Ala Ike roads. This is also the only access to the campus. A permanent second access road to the vehicle and maintenance storage facility and LCC should be provided to ensure for adequate and safe vehicular movement and to address potential health and safety reasons should the need ever arise to evacuate the campus or the vehicle and maintenance storage facility due to man-made or natural emergencies. The Second Access Road Project's environmental assessment (conducted by the State Department of Transportation) was completed in January 2008 and construction of this roadway is imperative in order to serve the needs of the community, the current and expanding enrollment at the College, and future development of the vehicle and maintenance storage facility. The preliminary plans by the C&C for the vehicle and maintenance storage facility would complete approximately one half the length of the Second Access Road. Funding of the remaining roadway project to the Waipio Point Access Road should be a top priority.

Completion of the Second Access Road would fulfill the access needs identified in the original master plan of the College which was completed in 1966. Without this roadway, the students, faculty, staff, community, and in the future, the employees and contractors associated with the HHCTCP, will continue to see an increase in the time necessary to move to/from the area and navigate the bottleneck that is created several times per day at the intersection of Farrington and Kamehameha Highways with Waiawa Road.

In addition, according to the DEIS, the vehicle and maintenance storage facility may be used as a staging area for various phases of the HHCTCP construction. Without the Second Access Road project, this would continue to add increased truck and vehicular traffic and hasten the deteriorating conditions of the existing Ala Ike and Waiawa roadway infrastructure.

Other campus concerns regarding the vehicle maintenance and storage facility include:

- a) LCC Observatory Impacts: That lighting within the complex and associated track/roadway network is compatible with night time viewing from the LCC observatory complex.
- b) Perimeter Boundaries: That appropriate and secure perimeter boundaries around the complex and adjacent to the campus are created with sufficient lighting, fencing, and landscaping in order to reduce the threat of vandalism and property damage.
- c) Air Quality: That during the construction phase of this complex, that adequate measures and safeguards be taken to ensure that dust and other particulate matter is not released into the air. The Ewa side of the LCC campus, closest in proximity to the complex, contains our Native Hawaiian plant collection, automotive instructional facility, and an indoor/outdoor daycare facility. Air quality is of utmost importance. The campus requests that frequent air sampling tests be conducted during the construction phase of the complex.

2. LCC Transit Station

The HHCTCP plan includes the construction of a rail transit station on the Ewa side of the LCC campus. This is not a park-and-ride station/stop. The rail line would enter the LCC campus from the Ewa side of the property line, cross the LCC Ewa service road, and stop at the transit station situated on a parking lot that is home to four (4) portable buildings. These buildings are currently in use by the LCC Office of Continuing Education and Workforce Development (OCEWD – 3 buildings) and the University of Hawaii-West Oahu's (UHWO) Center for Labor, Education, and Research (CLEAR – 1 building). The rail line would then continue on a Koko Head direction, across an LCC parking lot, then crossing Ala Ike before traversing the H1/Farrington/Kamehameha highways. In order to construct the transit station, the C&C would have to acquire 3.94 acres of land from LCC and the UH. The transit station platforms would be approximately 300 feet in length.

Campus concerns regarding the transit station include the following:

- a) LCC Portable Buildings: The three (3) OCEWD portable buildings comprise approximately 5,500 gross square feet of space. These buildings house the LCC continuing education and workforce development administration, instruction, and support facilities. This community and public service program serves more than

3,800 students during the year through their various academic, workforce, and personal enrichment programs. Elimination of these buildings would require that suitable facilities are provided on the LCC campus in order to continue uninterrupted offerings of credit and non-credit programs to our students. This is also a revenue generating unit of LCC and as such closure or elimination of any program due to lack of adequate space or facilities has a direct impact on the campus operating budget.

- b) UHWO Portable Building: The other displaced portable building is related to the UHWO's Center for Labor, Education, and Research. LCC will defer all DEIS comments related to the impact of the transit station on this facility to the UHWO administration.
- c) Programmatic Impacts: Elimination of the parking lot near the OCEWD building complex will also eliminate the LCC motorcycle range lot and the forklift training site. This has a direct impact on the campus' ability to deliver these programs and services. Replacement facilities for these two programs are necessary. Without replacement facilities, the campus stands to lose its largest non-credit revenue generating program and will be required to terminate employment of instructors.
- d) Parking Impacts: According to the preliminary HHCTCP plans, the LCC campus would lose up to 180 parking stalls. This problem is even more profound given the fact that enrollment at LCC is at record levels. On-campus parking solutions must be found, especially during the construction phase of the project and up until the time that the rail system is actually operational. Replacement of the lost parking stalls can be mitigated by constructing a paved parking area in the overflow parking area on the makai side, or lower campus, area. Service road improvements would also be required.
- e) Roadway Impacts: The rail line will cross Ala Ike and the Ewa service road as trains enter/exit the campus boundaries. These roadways provide the only access to the lower campus facilities and services. It is critical that during the construction phase of the rail station, that access to the lower campus, either by these roadways or a campus-approved alternative, be maintained. Lower campus access is required for; daycare drop-off/pick-up services, emergency/medical vehicular access, contractor and building maintenance, observatory facilities, food service and bookstore deliveries, automotive instructional facility, nursing program facilities, the recreational court complex, and overflow parking.
- f) Security Impacts: Since the LCC transit station is not associated with a park-and-ride lot, then riders who utilize the LCC stop will likely be members of the LCC community...either students, faculty, staff, or the public at large attending a special event, theatrical performance, or other like service or program. Inasmuch that these services and programs are offered during set periods of the day, LCC will request that the transit stops be adjusted to coincide with the classes and activity schedule of the campus. It is requested that the transit station operational hours be restructured so that riders are not permitted to board or depart the rail line at LCC

during the non-class or non-activity times. This will certainly assist with potential security, vandalism, and property damage issues to the campus, the vehicle and maintenance storage facility, and the local neighborhood residents.

- g) Transit Station Ingress/Egress: Access to the station platforms will be via a station plaza and entrance ramp system of approximately 270' in length that would connect to the existing promenade walkway facing the mauka side of the Math and Science building. A rail system ticketing office is also planned at the entrance to the station. To ensure safe pedestrian (including ADA-related accommodations) access to/from the station, it is requested that the station walkways extend and connect to the existing LCC pedestrian corridors and walkways. It is not clearly evident from the preliminary plans or the DEIS that the two walkway systems are connected.



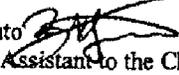
UNIVERSITY of HAWAII*
HONOLULU
COMMUNITY COLLEGE

Office of the Chancellor

Memorandum

January 28, 2009

TO: Brian Minaai
Associate Vice President for Capital Improvements
University of Hawai'i System

THRU: Brian Furuto 
Executive Assistant to the Chancellor
Honolulu Community College

FROM: Michael Rota 
Interim Chancellor
Honolulu Community College

SUBJECT: HCC Comments on the Proposed Honolulu High Capacity Transit
Corridor Project Draft Environmental Impact Statement

Below please find Honolulu Community College's (HCC) comments on the aforementioned Draft Environmental Impact Statement (DEIS). These comments represent an abstract of comments provided to me by the HCC faculty and staff. As the process moves forward and project details are made clear, we plan to request further input from HCC stakeholders, including our students.

It is important to note that the Kapalama Station, which will be located on land currently owned by the University of Hawai'i-HCC, is only one of five stations included in all variations of the rapid transit system plan. With a development of this magnitude it is essential for us to be informed and involved in all phases of the planning and construction. In prior projects led by the City and County of Honolulu we have found that we are often times either not informed appropriately, and forced to make last minute accommodations for the project, or involved enough to ensure that the campus continues to operate as seamlessly as possible and that the project can be efficiently and effectively completed.

In summary, the DEIS proposes the following:

- The Kapalama rail station will be located at the corner of Dillingham Boulevard and Kokea Street.
- The rail system will travel along the entire length of the HCC's Main campus along Dillingham Boulevard.

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AR00057903

Brian Minaai
January 28, 2009
Page 2

Below please find Honolulu Community College's (HCC) concerns:

Health and Safety: The areas in and around the Main HCC campus, particularly along Kokea Street and the Kapalama Canal, are congested and hazardous for parkers, walkers, and drivers. The project will undoubtedly increase hazardous conditions, due to the higher volume of commuters and vehicles. It is unclear in the proposal whether sidewalks, road widening, or other safety measures are going to be implemented in parallel to the rail project to ensure the safety of our students, employees, and the general public. Liability will become an increasing concern as volume grows after the initial opening of the Kapalama Station.

Primary Campus Entrance and Parking: As noted above, parking along Kokea Street is at a premium. The proposed location for the Kapalama Station is immediately adjacent to the primary entrance and parking lot, Lot 1 (see Attachment A), for students, faculty and staff. It can be assumed that unauthorized vehicles will enter the campus through the Kokea Street entrance and park in Lot 1. The campus is not prepared from a funding or planning perspective to relocate the entrance or parking and given the fiscal condition of the State it is doubtful that we will receive such funding. It is unclear in the proposal whether funding from the project will be allocated for traffic abatement or the relocation of the entrance and parking lot. Again, liability will become an increasing concern as rider volume grows.

Traffic: Although the ultimate goal for the rail project is to decrease traffic congestion, in the current configuration, the roads (Dillingham Blvd, Kokea St., and Kohou St.) will become even more congested. The intersections of Kokea Street and Kohou Street on Dillingham Boulevard are extremely congested during peak traffic hours. The DEIS does not include information on whether the support structure will impact the existing lanes and alleviate traffic at these intersections. The intersection of Alakawa Street and Dillingham Boulevard is also a high traffic area throughout the entire day (due to Costco, Home Depot, and Best Buy) and details on how the traffic will be managed for the left-turning lanes and the support columns should be addressed.

Future Growth and Capacity: HCC has one of the only remaining large, vacant, and developable parcels in the Kalihi-Palama area. The Campus' long term plans for the former City and County of Honolulu incinerator lot are to construct a Science and Technology Building to accommodate growing state workforce needs in STEM related fields. In 2006 the Legislature appropriated planning money that has not yet been released by the Department of Budget and Finance. Until we begin construction, the lot is being used for parking. A project of this magnitude will need space for a baseyard during construction and, once construction is completed, rail maintenance. Our concern is that we may lose this lot.

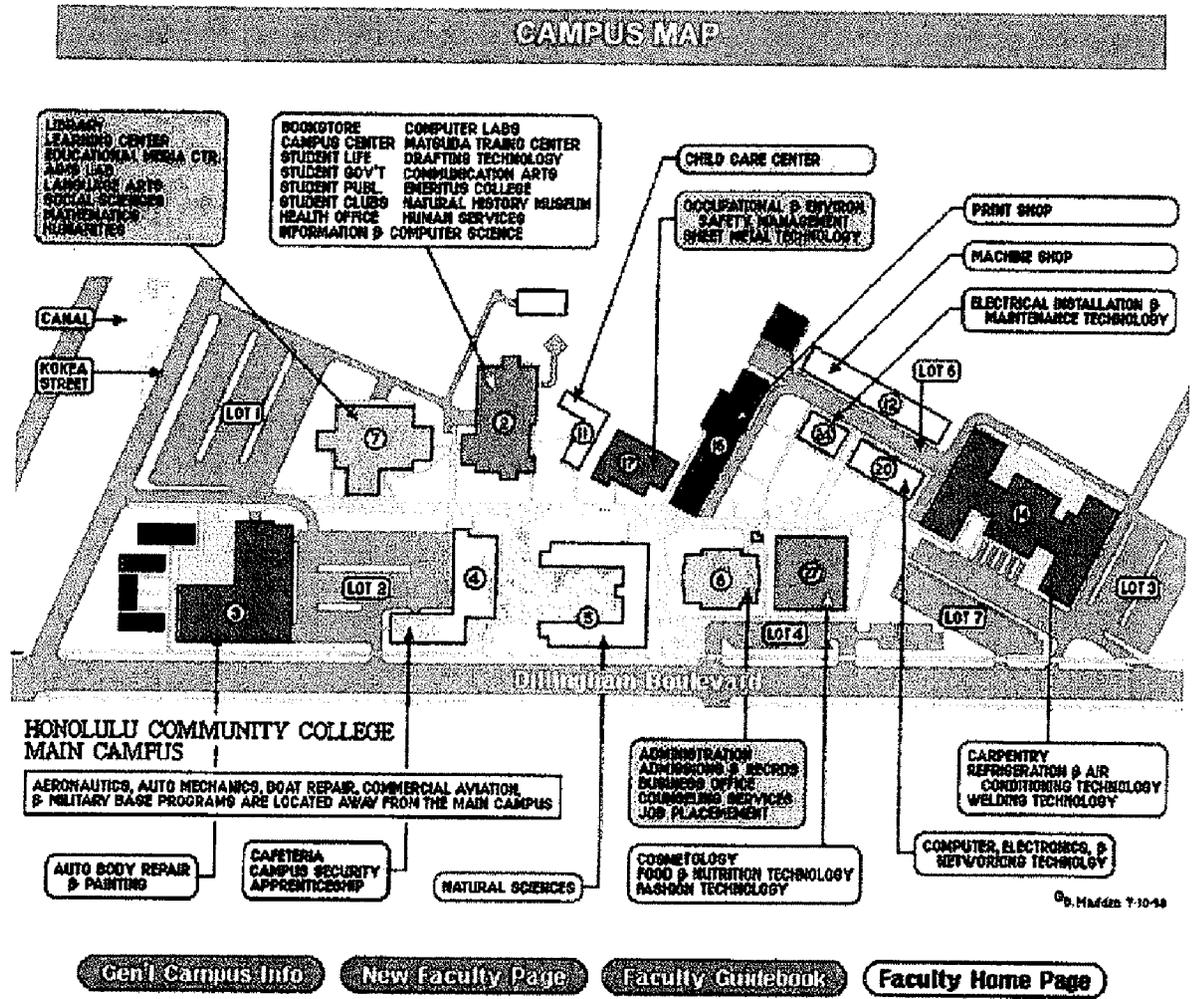
Brian Minaai
January 28, 2009
Page 3

Infrastructure and Buildings: It is unclear in the current proposal whether buildings, particularly the portables (Buildings 71A-D) at the corner of the Kokea and Dillingham, will have to be moved or demolished to accommodate construction of the Kapalama Station or the rail system itself. In addition, the simulation of Dillingham Boulevard on Page 4-76, Figure 4-28 shows the removal of power lines. It is assumed that as part of the construction of the elevated guideway, the power line will be placed underground along the new right-of-way for Dillingham Boulevard, but because of the current configuration of buildings and roads we are unsure how this portion of the project can be completed without major interruptions to campus operations.

Noise: Noise as a result of the trains so close to the campus will be an issue. At a rail transit presentation given to the HCC constituency in October 2008, it was stressed that the train will make less noise than a city bus. However, this is misleading because train noise won't be heard in a vacuum and will not replace bus noise; rather it will add to the current level of bus and traffic noise. Furthermore, it can be assumed that traffic volume of large vehicles, such as The Bus, will increase in frequency and volume due to the Kapalama Station and new business development along the train route. This will simply compound train noise.

Environment: There are True Kamani Trees located along the south side of Dillingham Boulevard. The DEIS shows that these trees will be removed. We strongly recommend that these historic trees be preserved and transplanted somewhere on the HCC Main campus.

If there are any questions, please contact me at 845-9187.



DATE: January 2, 2009
FROM: University of Hawaii at Manoa
Office of the Vice Chancellor

Response to:
Honolulu High-Capacity Transit Corridor Project
Draft Environmental Impact Statement
Section 4(f) Evaluation
Dated November 2008

Comments:

The following comments are supplied by the University of Hawaii at Manoa (UHM) administration. We believe that these comments not only represent the opinion of the UHM administration but that they also reflect much of the UHM campus community's opinions on the transit topic.

Overall the UHM administration is in favor of establishing a high-capacity transit system that would serve the needs of the UHM and other UH campuses as well as the larger Oahu community. We believe that if done properly, this system could provide needed travel options, help to alleviate the growing traffic congestion and encourage transit oriented community development while supporting future growth, new development opportunities and connectivity for university campuses. While there is general support and agreement for the concept of the high-capacity transit system, how the system is designed and integrated into the community and that it integrally support the university's needs, are of specific concern. Furthermore, this Draft EIS does not, specifically or in detail, address the Mo'i'ili'ili / UHM leg of the project, the comments herein will be particularly focused on that portion of the proposed transit system.

Meeting UHM's Primary Needs:

The University of Hawaii Manoa campus has an enrollment of **21,000 students and 6,000 faculty and staff**. UHM is largely a commuter campus. There is a noticeable difference to Honolulu's traffic when UH is not in session. The existing commuter condition puts street parking pressure on the surrounding neighborhoods and causes the campus to create more parking facilities. Having viable transportation options to the single occupant vehicle will help to alleviate the ongoing tension with the neighbors for parking and allow the limited campus space to be used in support of higher education programs rather than parking. In addition, a viable high-capacity transit system could support future growth at the university and not constrain that growth with the need to increase on-campus parking infrastructure. It is critically important for this transit system to serve inter-campus connectivity as major portions of the UH program expand to locations such as West Oahu and Kakaako. The core high-capacity line is important but to successfully serve the UH population's needs an effective feeder system of buses must be in place to support travel to and from the trains.

The Manoa campus is a center for athletic, artistic and academic events. Tens of thousands of people arrive for a single campus event. Traffic congestion is a deterrent for increased participation for these events. A properly integrated transit system should support greater community access and participation in these events.

It is of primary importance to the university that any transit system that interfaces with the campus provide a safe transportation mode for our students- in the stations and on the trains. Transit connections with the university should not compromise the safety and security of campus life and operations. The system should bring added economic value to the campus and surrounding community and it should not have detrimental visual or environmental impacts.

Meeting UHM's Secondary Needs:

A high-capacity transit system should enhance housing and transportation options for UH students, faculty, staff and the community. The transit line must not overwhelm or bifurcate the community but create economic vitality with improved livability and property values.

The Moi'ili'ili area is overdue for revitalization. The UHM administration is very interested in engaging Kamehameha Schools (KS), other property owners and the community, the City and County and other stakeholders to discuss the mutually beneficial opportunities for the redevelopment of the Moi'ili'ili area.

Kamehameha Schools has major property leases terminating in that area currently and over the next five years. UHM is considering new housing and commercial opportunities in the area, KS, and other property owners, are interested in improving the value of their holdings, the community wants safety, affordability, livability and it fears displacement. This impending redevelopment should not proceed in a piecemeal fashion. Any changes will effect the economy and character of the neighborhood. Issues of density, housing, commerce, zoning, infrastructure, and transportation will be fundamental considerations in the redevelopment of the area. In Table 2-3, *Committed Congestion Relief Projects* of the draft EIS, indicates that the University Avenue H-1 on and off ramps will be modified. These modifications, community planning and especially the introduction of the transit line must be considered holistically if the university/ Moi'ili'ili community will be integrated and invigorated and if this leg of the transit line is going to be useful and beneficial. It is critical that the City and County become engaged, in the immediate future, with UH, KS, the community and other stakeholders in planning the redevelopment of this community with the transit integration. If the City and County does not soon engage with these stakeholders, the redevelopment will proceed as needed and it will be much more difficult to include the transit line through the newly redeveloped community in the future.

Potential Visual Effects:

Included are images including a simulation and drawing of the University leg of the transit line. (Figures 1-3) These images do not show the further impact of the station. These images indicate that the design of the line is not integrated into the fabric of the community.

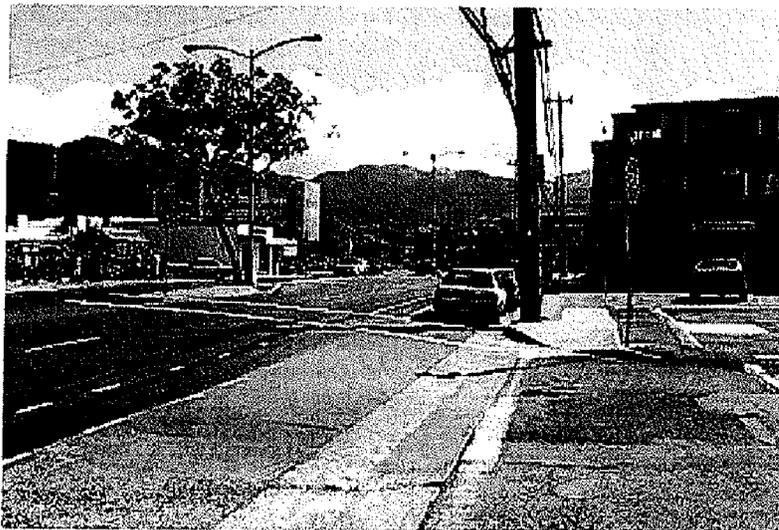


Figure 1- Existing Condition- University Ave and King Street – Looking Mauka up University Ave.

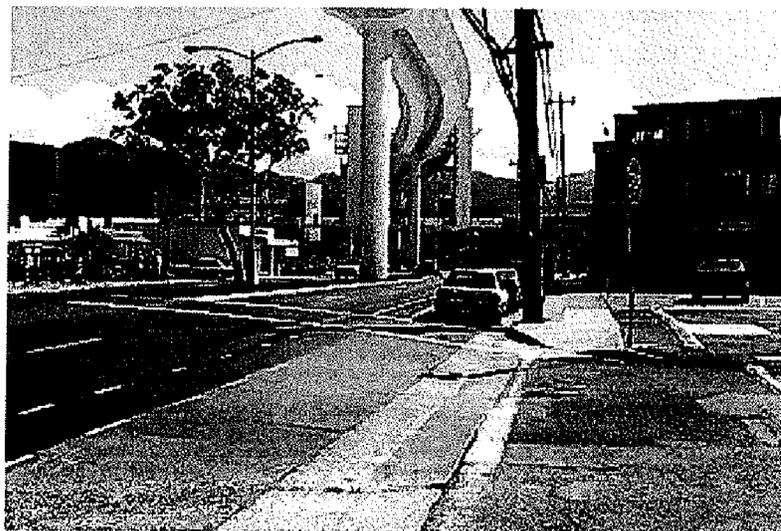
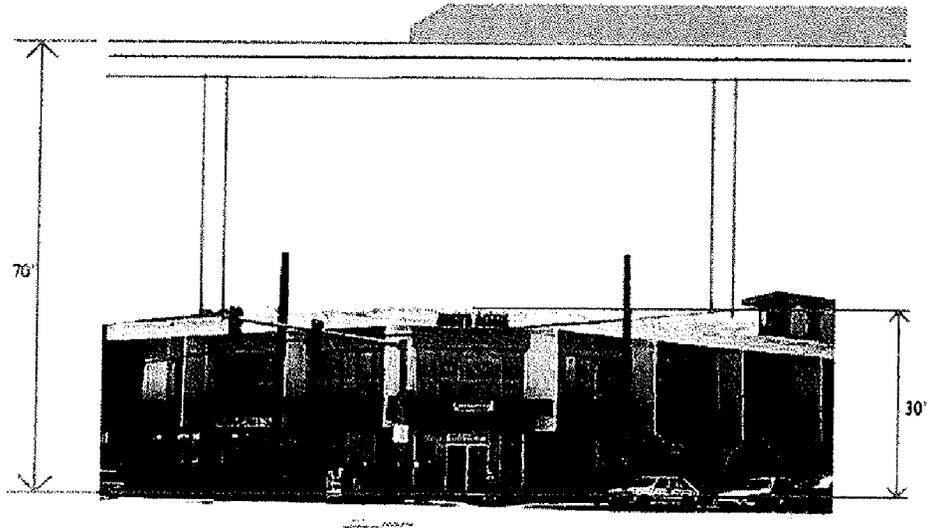


Figure 2- Transit Line Simulation- University Ave and King Street – Looking Mauka up University Ave.



**Figure 3- Elevation of Buildings with Transit line-
Corner of University Ave and King Street**

In Section 4.18.2 Indirect Effects-, on page 4-170 *Neighborhoods*, there is a statement, "... *H-1 Freeway, have affected neighborhoods by cutting through and separating communities in the urban area and changing the character of communities. ... however effects as extensive as those caused by the construction of a new freeway would not occur*". Although the transit line impacts along University Ave may not be as extensive as those caused by H-1 they are substantial, they have a high visual impact and they have, once again, the potential of negatively and irreversibly changing the character of the *Moi'ili'i* community as H-1 once did. The H-1 overpass has also had a detrimental impact in bifurcating the university/ *Moi'ili'i* community connection for the last forty years. This should not happen again. This is the time to look at the needs and aspirations of all parties, to once again make *Moi'ili'i* whole and to comprehensively plan for the beneficial integration of transit into the *Moi'ili'i* / UH community.



Reit Management
& Research LLC
PROPERTY MANAGEMENT
DIVISION

February 6, 2009

VIA REGULAR AND CERTIFIED MAIL,
RETURN RECEIPT REQUESTED

Wayne Yoshioka
Director
Department of Transportation Services
City and County of Honolulu
650 S. King St., 3d Floor
Honolulu, Hawaii
96813

Re: Comment on Honolulu Rail Transit Draft Environmental Impact Statement

Dear Mr. Yoshioka:

I am Vice President-Pacific Region, for Reit Management & Research, LLC, the property manager for HRPT Properties Trust ("HRPT"). Through its affiliated companies, HRPT owns the Mapunapuna Industrial Subdivision, including the property bounded by Ahua Street, Nimitz Highway, Puuloa Road, and Pukoloa Street, shown on Figure 2-7 of the Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement ("Draft EIS"). HRPT appreciates the opportunity to comment on the Draft EIS.

HRPT understands that on January 28, 2009, the Honolulu City Council by resolution voted to change the route of the initial segment of the Honolulu rail transit project from the Salt Lake Alternative to the Airport Alternative. HRPT strongly supports the rail transit project, and is not advocating any specific route at this time. Based upon the Draft EIS and the City Council's action, HRPT understands that the City Council in its discretion may in the future add a Salt Lake "spur" to the project or otherwise amend the route to include Salt Lake and Mapunapuna. Should the route be changed to pass through Mapunapuna, HRPT believes a transit station in Mapunapuna would increase system ridership and provide substantial benefits and development opportunities for the surrounding community, businesses and their employees and customers, and the landowners of the property. HRPT therefore respectfully requests that at the appropriate time the City Department of Transportation Services ("DTS") study, place, and construct a transit station in Mapunapuna, if the route is subsequently amended to include a spur or other alignment through Mapunapuna. In that regard, HRPT respectfully requests that DTS consider the following:

1. Technical Feasibility of Transit Station in Mapunapuna—HRPT understands that initially there were some questions as to whether a transit station in Mapunapuna was technically feasible, and that was one of the reasons why a Mapunapuna station was not proposed in the

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Draft EIS for the Salt Lake Alternative. To address those questions, HRPT retained URS Corp. ("URS") to analyze the feasibility of a Mapunapuna transit station. URS has been involved in the design and engineering for numerous transit projects around the country, including systems in Portland, Seattle, and San Diego. For their analysis, engineers from URS' Portland office reviewed conceptual engineering level track plans, profile drawings, and background information for the Honolulu project, and communicated with the Honolulu project lead engineer.

Attached as Exhibit 1 please see a December 24, 2008 opinion letter from Bob Post, senior transit engineer and vice president of URS. Mr. Post writes in relevant part:

Based upon (our) reviews and our own work on similar projects utilizing similar transit technology it is our conclusion that a station could be added to the alignment in the vicinity of Pukoloa and Ahua Streets in the Mapunapuna area. We do not believe making the suggested design changes would result in a negative impact on the project operations or ride quality. Although the addition of a station in this area would add some time to the overall travel time, the impact is lessened in this particular case due to the grades and curves in this segment of the corridor that would already result in reduced speeds.

Based on industry standards, URS concluded that with relatively minor adjustments to the proposed track alignment there are at least three viable options for a transit station in Mapunapuna. As shown on the alignment plans prepared by URS and attached as Exhibit 2, the three potential locations are (1) Option A: Intersection of Pukoloa and Ahua streets, ewa-makai side, flat grade; (2) Option B: Intersection of Pukoloa and Ahua streets, ewa-makai side, 1 percent grade; and (3) Option C: Intersection of Pukoloa and Ahua streets, diamond head-mauka side. Of the three options, Option C is particularly promising, as it is immediately adjacent to a large lot that will become vacant and available in the near future, and would be ideal for transit-oriented development and other amenities to enhance transit ridership.

Option A: Intersection of Pukoloa and Ahua streets, ewa-makai side, flat grade:

In this option, the -4% proposed grade for the track profile would be changed to -5%, which URS considers a reasonable grade for a modern transit vehicle. The -5% grade would transition through a 500 foot vertical curve (beginning at station 1117+33) to a 0% grade, and then back to the originally proposed 4% grade on the diamond head side of Moanalua Stream. The modified profile would allow a station platform to be located on the ewa side of the intersection of Pukoloa Street and Ahua Street, on a zero percent grade and horizontal tangent. The top of rail elevation would be about 37 feet above existing ground. Since this option would not modify the horizontal alignment, the general structure footprint would be unchanged except for widening in the station area.

Option B: Intersection of Pukoloa and Ahua streets, ewa-makai side, 1 percent grade: This option would use the same horizontal alignment and station location as Option A, but rather than a flat grade a 1% grade would be introduced, which would match back into the original profile sooner and help shorten the transit station structure. Shortening the structure would likely result in some cost savings. URS does not believe the proposed 1% longitudinal slope would be a problem for construction, operations or passenger loading.

Option C: Intersection of Pukoloa and Ahua streets, diamond head-mauka side: This option could use either of the previous two vertical alignments. The difference would be to reduce the radius of the horizontal curve at Ahua Street to 810 feet, effectively lengthening the

adjacent tangents and enabling a station location approximately 150 to 200 feet further to the east. The elevated transit station would span over Ahua Street and allow access from ground level on both sides of the street, the diamond head side being the existing 7.75-acre "auto auction" lot site. The proposed smaller curve radius would match the original radius proposed at the next curve to the south. Although the smaller radius would slightly lower the potential operating speed through the curve, the presence of a platform would likely be the limiting factor in terms of speed on this section of track in any event.

2. Potential Benefits of a Transit Station in Mapunapuna—Today, many employees of Mapunapuna businesses have to park on the street, sometimes blocks away from where they work. Potential customers are discouraged from even coming to Mapunapuna, because of the congestion and lack of parking. Having a transit station in Mapunapuna would provide a convenient and inexpensive way for both employees and customers to get to and from Mapunapuna, and make Mapunapuna a better place to work and do business.

Furthermore, a transit stop in Mapunapuna would draw riders from nearby residential communities in Moanalua, Tripler, and east Salt Lake, who otherwise would not have convenient access to the transit system with the stations proposed in the Draft EIS. The aerial view of Figure 2-7 of the Draft EIS shows the substantial geographical "gap" between the proposed Ala Lilikoi and Middle Street stations on the Salt Lake Alternative, and all of the additional homes that would be served by a Mapunapuna station. Given the thousands of residents in those communities; the approximately 21,000 people who work at approximately 1,100 businesses in or around Mapunapuna; and the hundreds if not thousands of business customers who visit Mapunapuna every day, HRPT believes that a transit station in Mapunapuna would additionally draw at least if not more than the 1,500 or so daily riders projected for the Ala Lilikoi and Middle Street stations on Figure 3-12 of the Draft EIS.

Finally, a transit station in Mapunapuna would provide exciting opportunities for transit oriented development, particularly on the 7.75-acre lot near the corner of Ahua and Pukoloa streets that will become open and available for development in the next few years. Transit oriented development would bring new amenities, services, and vitality to Mapunapuna, benefiting not only existing but also future businesses and residents in the area.

We look forward to the possibility of working with and assisting the City to develop a transit station in Mapunapuna, should the transit route be amended to include a spur or other alignment through Salt Lake and Mapunapuna in the future.

Mahalo,



Brad Leach



December 24, 2008

Mr. Bradford C. Leach
Vice President – Pacific Region
Reit Management & Research LLC
733 Bishop Street, Suite 1820
Honolulu, HI 96813

RE: Station Feasibility In Mapunapuna

Dear Mr. Leach,

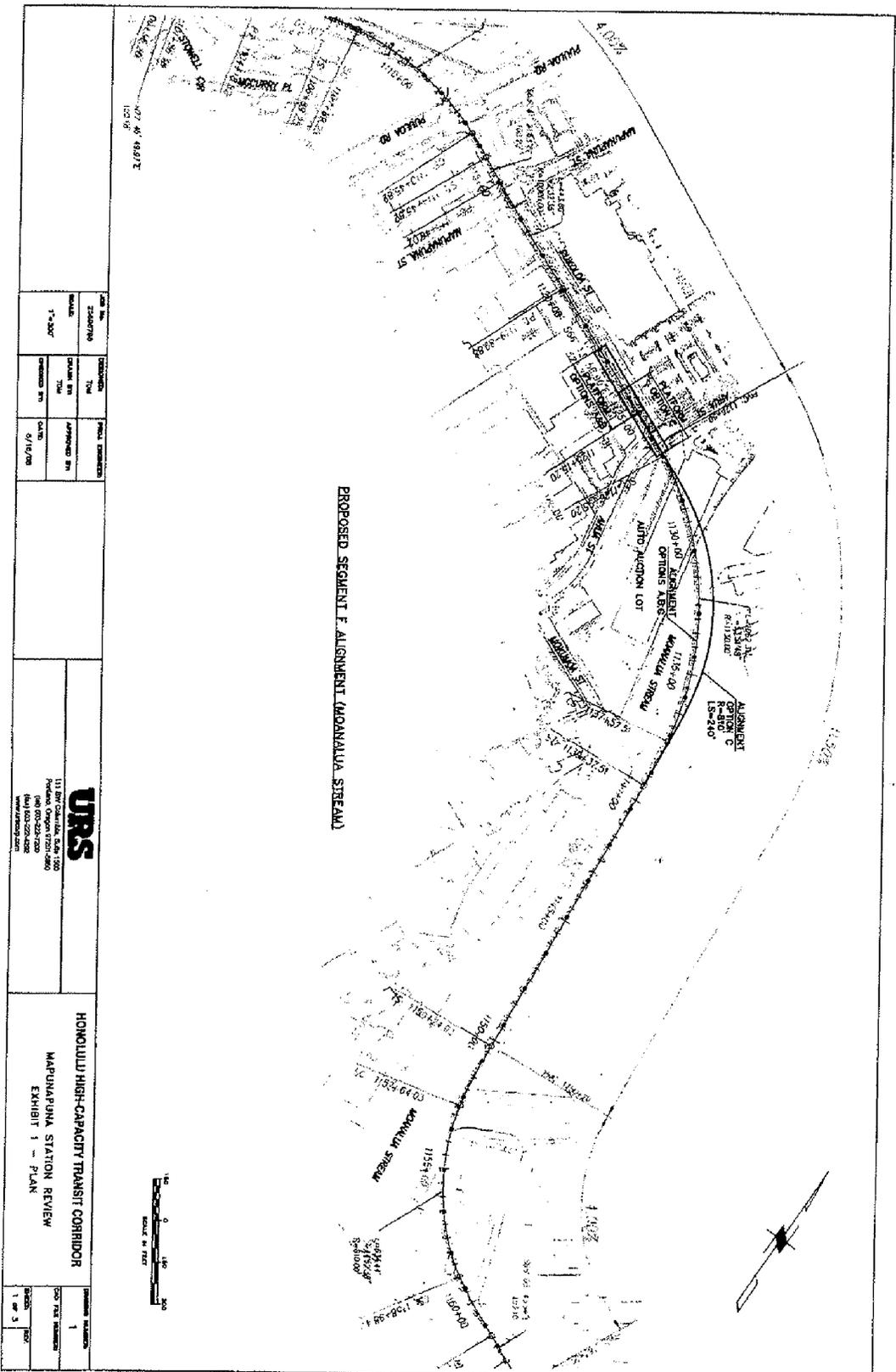
As we have communicated previously, URS has conducted a review of the Honolulu High Capacity Transit Corridor in the Mapunapuna area to determine the technical feasibility of adding a station to the planned Honolulu High-Capacity Transit project. We have reviewed the project design documents provided to us by Reit Management & Research. We have also reviewed the generally accepted industry design standards for horizontal and vertical curves and track grades in station areas for similar projects. Based on the above reviews and our own work on similar projects utilizing similar transit technology it is our conclusion that a station could be added to the alignment in the vicinity of the intersection of Pukoloa and Ahua Streets in the Mapunapuna area. We do not believe making the suggested design changes would result in a negative impact on the project operations or ride quality. Although the addition of a station in this area would add some time to the overall corridor travel time, the impact is lessened in this particular case due to the grades and curves in this segment of the corridor that would already result in reduced operating speeds.

While the drawings previously provided by URS illustrate options that would allow for the addition of a station in the Mapunapuna area and meet generally applied industry standards, we do acknowledge that individual jurisdictions implementing rail transit projects can establish criteria that are more restrictive than the general industry practices.

Sincerely,

Bob Post
Vice President

URS Corporation
111 SW Columbia, Suite 1500
Portland, OR 97201-5850
Tel: 503.222.7200
Fax: 503.222.4292



PROPOSED SEGMENT F ALIGNMENT (MOANIALUA STREAM)

SHEET NO. 1 OF 3	DATE 1/27/03	DRAWN BY JTB	CHECKED BY JTB	PROJECT ENGINEER DATE 9/16/03	URS 111 BAY CHURCH BLVD, 7TH FLOOR HONOLULU, HI 96813 TEL: 808-521-7200 FAX: 808-521-4200 WWW.URS.COM	HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR MAPUNAPUNA STATION REVIEW EXHIBIT 1 - PLAN	CD/ FILE NUMBER 1
							SHEET 1 OF 3

A. LONO LYMAN
P. O. Box 3896
Honolulu, Hawaii 96712-3896

February 5, 2009

City and County of Honolulu
Department of Transportation Services
650 South King Street
Honolulu, Hawaii 96813

Subject: Draft Environmental Impact Statement, Honolulu High-Capacity Corridor Project.

I support the need for a mass transit system in Honolulu, and supported the Mayor's position on the proposed transit related amendment to the City Charter that was considered this past November.

However, with regard to the Draft Environmental Impact Statement (DEIS), Honolulu High-Capacity Corridor Project, I am of the opinion that the draft document needs to address similar mass transit alternatives that would not be elevated; in other words, similar alternatives that would be built at grade for either the entire route or portions of the route. Without an analysis of at grade alternatives, there is no basis for determining that the elevated system is the preferred alternative, particularly with respect to cost, visual impacts, and noise impacts.¹ Compared to the elevated alternative, at grade alternatives would not have as significant visual impacts and would likely be less costly.

The DEIS also does not have detailed information regarding the visual and noise impacts, and detailed information how these and other adverse impacts will be mitigated. Without this detailed information, there is not a meaningful basis of evaluating the impacts and the proposed mitigation measures.

In general, and specifically with respect to the two prior comments, as drafted, the DEIS does not meet the requirements of HAR 11-200-17 (g) through (n).

Mahalo a nui loa,
A. Lono Lyman



¹ HRS §343-5 (b) states: "Whenever an agency proposes an action in subsection (a), other than feasibility or planning studies for possible future programs or projects that the agency has not approved, adopted, or funded, or other than the use of state or county funds for the acquisition of unimproved real property that is not a specific type of action declared exempt under section 343-6, the agency shall prepare an environmental assessment for such action at the earliest practicable time to determine whether an environmental impact statement shall be required." [Underscoring added]

HAR 11-200-5 (d) states: "For agency actions, chapter 343, HRS, exempts from applicability any feasibility or planning study for possible future programs or projects which the agency has not approved, adopted, or funded. Nevertheless, if any agency is studying the feasibility of a proposal, it shall consider environmental factors and available alternatives and disclose these in any future assessment or subsequent statement. . . ." [Underscoring added]

Kaka'ako Business and Landowners Association

P.O.BOX 898

Honolulu, HI 96808

Tel: (808) 597-1102 Fax: (808) 591-6634

Mr. Ted Matley
U.S. Department of Transportation
Federal Transit Administration -- Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

February 3, 2009

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 Messrs. Matley and Yoshioka,

The Honolulu High-Capacity Transit Corridor Project(HHCTCP), the accompanying construction, and the Transit Oriented Development(TOD) will have a detrimental impact on the small businesses and small property owners in Kaka'ako. What makes it more tragic is that the purpose of the HHCTCP as stated in the Draft Environmental Impact Statement(DEIS) preface to connect Kapolei to University of Hawaii at Manoa will not be fulfilled. The DEIS trivializes the problems that the HHCTCP will cause. The DEIS also minimizes and pushes the mitigating steps into sometime in the future.

Kaka'ako Mauka is a mixed use(residential, commercial, service and light industrial) district under the jurisdiction of the State of Hawaii. In 2006, there were 1,479 businesses with 16,931 employees(3.7% of Honolulu's workforce). The 2006 annual sales of businesses was \$2.02 billion. On Oahu, it is the farthest east industrial area that serves all of East Honolulu, much of the Windward area, and the urban core. Any disruption of the businesses in Kaka'ako will have a ripple effect through Honolulu's economy.

In the DEIS, it states:

1. P. i "... the Council of the City and County of Honolulu selected the Locally Preferred Alternative to be a fixed guideway project from Kapolei to the University of Hawai'i at Manoa(UH Manoa) with a connection to Waikiki."
2. P.1-19 "The continued operation of UH Moana as a commuter school along with the opening of UH West Oahu will generate a strong student transportation market in the study corridor."

With this in mind, the voters of the City and County of Honolulu voted on the rail transit issue, 53% for and 47% against. The initial segment will go from Kapolei to Ala Moana Shopping Center. On page 33 of the DEIS Appendix A, the station at the end of the initial segment at Ala

Moana Shopping Center will be 35-40 feet above the street level, nowhere close to clearing the newly built Nordstram extension of Ala Moana Shopping Center. So how will the transit reach UH Manoa or Waikiki? Page 33 of the DEIS Appendix A also shows a separate “future extension” that starts climbing from 40 feet at Pensacola Street to 90 feet to clear the Nordstram extension. But the DEIS does not discuss this extension. What about the problems that will arise because of this “future extension”? How will these problems be mitigated?

1. Visual impact
2. 90 feet columns to support the rail and the station
3. How will it come down on the Waikiki side of the Nordstram extension
4. How will it fit the narrow canyon of Kona street between the big buildings.

Without clarifying information in the DEIS, it can only be assumed that the “future extension” is either an impractical task or a cost prohibitive task because if the “future extension” is viable, then why build the station at 40 feet in the initial segment. This means that the Locally Preferred Alternative will not be achieved.

1. The traffic caused by students going to UH Manoa will not be relieved
2. The traffic caused by workers going to Waikiki will not be relieved
3. Businesses have suffered or closed down for nothing
4. Property owners have lost all or part of their property for nothing
5. Would the vote have been 53% to 47% if this information had been out before the election

Since the LPA goes to UH Manoa and Waikiki, the DEIS must validate how the route is going to get to UH Manoa and Waikiki from Ala Moana Shopping Center. If the problems are too great to mitigate, then alternative routes must be studied, Kapiolani Boulevard or King Street.

Far too often, when there is a construction project, there is too much hoopla that goes on about how much job the construction project creates. What is overlooked or trivialized is the cost of the damage or outright destruction of small businesses and properties in the construction area. The Honolulu High-Capacity Transit Corridor Project DEIS is no exception. There is no analysis of the economic damage that the project will have on the small businesses both in regards to revenue and cost.

1. P.S-6 “Displaced businesses would need to purchase or lease new commercial/industrial space, and the location where employees would work would change.... Where relocations would occur, affected property owners, businesses, or residents would receive compensation ...”
2. P.4-20 “Based on the *relatively small numbers* of parcels affected by full acquisitions ...”
3. P.4-153 “Construction work details will be developed *during preliminary and final design*. Effects could include dust, noise, and traffic disruption congestion, and diversion, as well as *limited or temporarily* lost access and parking to residences and businesses. ... The maintenance and storage facility, park-and-ride lots, and stations *could* be used for construction staging areas. Additional area would be identified by

contractor *as needed*. ... Access to businesses near construction activities could be *temporarily* affected.”

4. P.4-154 “Segments of Halekauwila and Queen Streets *may* be made temporarily one-way or have parking eliminated during construction.”
5. P.4-155 “*During development of the Construction Safety and Security Plans*, measures would be identified to *minimize* effects on communities and their resources that address specific consequences anticipated at each location within the various communities, as well as ensure the safety of the public and the environment.”

These are only sample excerpts from the DEIS. Instead of a detailed study of the impacts, many of the problems are trivialized by using terms such as “relatively small”, “limited or temporarily” or “minimize” and solutions are pushed into the future, “during preliminary and final design”, “as needed” or “may”.

In Kaka’ako, there are many small businesses and properties around the current transit route. Some of the challenges that currently exist are:

1. Limited parking
2. Narrow street
3. Congestion
4. Building settling problems due to loose compaction of soil in the past
5. Water table close to ground level
6. Underground streams
7. Lack of area for dewatering
8. Old and fragile infrastructure

These challenges will be exacerbated by the construction. The DEIS does not come even close to addressing these challenges. The result will be the damaging or destruction of these small businesses.

In regards to TOD, the DEIS states:

P 4-166 “...the Project’s primary indirect effect would be to alter development near the stations, bringing higher densities than presently planned...”.

The rule of thumb often mentioned is that the TOD applies to areas within a quarter mile radius of the transit station. With the two stations in Kaka’ako, all of Kaka’ako becomes a TOD. With higher density comes higher property valuations thus higher property taxes. Higher properties taxes will make it difficult for small businesses to remain in Kaka’ako. What impact will the TOD and accompany rules have on the character of the Kaka’ako community and the support it provides to the rest of Honolulu? The DEIS does not address this issue.

The DEIS must be expanded to include:

1. A detailed analysis of whether the LPA can be achieved. What are the impacts of extending the initial segment from Ala Moana Center to UH Manoa?

2. The LPA was approved going through Salt Lake; yet the Airport alternative was included in the DEIS. Under the same logic, the DEIS should be expanded to include an analysis of alternative routes that will go from Iwilei to King Street or Kapiolani Boulevard.
3. A more detailed analysis of the impacts on construction on the communities.
4. A more detailed analysis of the impacts of TODs on communities.
5. More meaningful mitigating steps.

The HHCTCP should serve the communities of Honolulu. The communities should not serve the HHCTCP.

Thank you,

A handwritten signature in black ink, appearing to read "Dexter Okada", with a long horizontal flourish extending to the right.

Dexter Okada

February 6, 2009

Mr. Ted Matley
U.S. Department of Transportation
Federal Transit Administration – Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

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

Re: Honolulu High Capacity Transit Corridor EIS

Dear Messrs. Matley and Yoshioka:

The City of Honolulu recently completed a Draft Environmental Impact Statement ("EIS") for the proposed Honolulu High-Capacity Transit Corridor ("Project"), a 20-mile elevated rail line that will connect the town of Kapolei in west O'ahu to downtown Honolulu.

CBRE Consulting was contracted by Kamehameha Schools to provide insight to the economic impacts that could be expected from the development and operation of the Project. Principals at CBRE Consulting have close to 30 years experience in analyzing market, financial and economic impacts for both public sector and private sector clients, including extensive work on O'ahu and over 20 years experience in market and financial feasibility and economic impact studies for transit oriented development projects throughout the United States.

CBRE Consulting has analyzed the Draft EIS, as well as development impacts of numerous transit systems in North America. With regard to the proposed system in Honolulu, we offer the following observations and comments.

GENERAL COMMENT

Per our review of the Draft EIS we note that it measured economic impacts at a regional level without consideration of the impacts to property owners in between station areas. Table 4-1 in the EIS identifies impacts from acquisitions, displacement and relocation of businesses in a statistical manner – not mentioning potential problems other than blocking views. The Mitigation measures proposed in the Draft EIS are minimal and should be expanded.

Transit systems have wide ranging impacts depending on the specific land use characteristics along the route. Analysis of potential impacts should not be confined to a regional level. We recommend that the City examine the local impacts all along the route and at each station area.

MAJOR NORTH AMERICA TRANSIT SYSTEMS

There are dozens of transit systems in the U.S. and Canada comprised of subways, heavy rail, light rail and elevated systems (i.e. monorails). Since it was not possible to analyze development patterns for every transit system, CBRE Consulting compiled a short list of systems to study based on relevant characteristics and the availability of data.

CBRE Consulting performed case study research on elevated, fixed-guideway systems (i.e. Vancouver, Miami, and the San Francisco Bay Area) to identify key issues they faced and their resulting impacts on local real estate markets. CBRE also examined successful ground level rail systems across the U.S. to illustrate their impacts on the community. Cities examined included Portland and Los Angeles. The analysis examined both impacts during the construction period and throughout ongoing operations.

Impacts During Construction

Research findings universally indicate significant losses to businesses along the construction routes of major rail systems, regardless of type. Traffic disruptions, limited access, visibility issues, utility service interruptions, and a general tendency for people to avoid esthetically unappealing construction sites resulted in declines in customer numbers, sales, and in some cases, the closure of businesses.

Some of the most dramatic cases of this type of negative impact were in Vancouver, British Columbia and Salt Lake City where an estimated 30 percent of local businesses closed during the construction of TRAX. In Vancouver, an estimated 40 to 60 percent of the businesses failed along the construction route for SkyTrain's Canada Line in Vancouver, due to a reported 50 percent decline in local sales volume during construction. The most significant cause of the negative impact in these locations was the lack of public assistance provided to support impacted businesses.

Property Value Impacts – Near Stations

While there has been a significant amount of research into the impact of transit on real estate values, very few quantitative conclusions are applicable across all metropolitan areas. Every transit system is unique in terms of the population it serves, frequency of service, cost of service, local economic factors, public support, integration with neighborhoods, etc. However, some general conclusions can be drawn from our primary and secondary research.

1. While land prices in a transit corridor can often exhibit significant increases following the announcement of a new system due to speculative activity, following completion of the system, research indicates that lower density (generally residential) land values often decline.
2. The broad economic benefits of rail transit tend to be limited to suburban communities outside major metro areas like New York City, where commuting by car is extremely difficult. Urban infill locations suffer negative impacts if the rail systems are not well-

conceived and potential impacts thoroughly evaluated and mitigated early in the design process.

3. Research indicates that different climate and environmental conditions can create negative impacts. For example, in urban areas with hot and wet climate, such as Miami, elevated lines can provide shelter for homeless, increasing crime and litter and thereby detracting from commercial activity.
4. Weather is not the only cause of security problems under elevated lines. Solutions to mitigate these concerns can include the installation of surveillance cameras, increased police patrolling, emergency call boxes, and closed-circuit television monitoring. In some cases, extensive lighting and/or illumination has been used to create openness and high visibility.
5. Generally, the land uses that most consistently benefit from transit station proximity are office and high density residential. The former tends to command higher rents due to a desirable ease of access for employees. Residential values also increase if increased densities (i.e., multifamily development opportunities) are a part of well-conceived TOD plans.
6. The impact on retail values is mixed and tends to depend both on the type of retail use and the type of rail system. Elevated systems can cause visibility problems for small street-front locations but can be instrumental in bringing shoppers to large malls or big box retail outlets. The design and orientation of the station is critical.
7. Proactive planning efforts to allow high density residential and commercial development near stations are the primary cause of land value appreciation. An example of this is the SkyTrain system in Vancouver, where the local governments instituted long term regional planning to create new town centers around elevated transit stations.
8. Major developments do not occur near stations in the absence of healthy demand, increased density, or a substantial financial subsidy by local governments. Our research found dozens of station areas where no new development has occurred for 20 to 30 years following the transit operation.

Property Value Impacts – Mid-Line

The third quarter 2007 Journal of Real Estate Research published one of the few studies on transit corridor impacts on all property proximate to transit corridors. "The Impact of Transit Corridors on Residential Property Values" by John Kilpatrick, Ronald Throupe, John Carruthers and Andrew Krause, found that "proximity to the transit corridor alone without a direct access benefit conveys a negative impact on nearby housing values." A direct access benefit is defined as being within normal walking distance i.e. less than one-half mile from a station. These negative impacts result from increased noise, pollution, crime, and diminished views.

In addition to the literature research, our primary research across the U.S. and Canada indicated there are significant negative value impacts on properties immediately adjacent to the rail line. These were particularly pronounced along the BART East Bay and Los Angeles Metro Blue Line.

CBRE Consulting analyzed these general research findings in terms of their application to the proposed elevated Honolulu Rail system. In general, we believe that elevated rail would impair redevelopment due to a loss of visibility and access from Kamehameha Highway and Dillingham Blvd.

As shown in the case study examples, we would expect retail uses to suffer from visibility, access and traffic interruption services. Depending on whether or not public assistance is available, retail sales could decline and turnover could increase.

Mid-Line residential development will also be negatively impacted by noise and visual impairments. At a minimum, it will be important for the City to provide sound-proofing for residential units within viewing distance of the elevated line.

Another important concern is that the noise, light and view impairments from elevated rail lines will have a dramatic impact on the marketability of future low-rise and mid-rise workforce housing development along the route. Developers may be forced to build more expensive high-rise developments to avoid those impairments.

SUMMARY FINDINGS AND RECOMMENDATIONS

CBRE Consulting found that there are significant negative impacts on selected properties associated with transit systems in general, most notably in the case of elevated systems. Depending on the property type, these can include the following:

- Loss of view and shadowing;
- Excessive noise;
- Increased crime and vagrancy;
- Loss of visibility (for commercial);
- Increased challenges to future residential development if not planned in advance and provided public financing support; and
- Property access issues.

Although all of the rail systems described in our case studies resulted in some negative impacts on surrounding properties, at least during construction, various aspects of each successful system depended on:

- The commitment of municipalities to employment and density;
- A sound strategy for land assembly;
- Healthy real estate market conditions;
- The interface and integration of rail and real estate concessions with adjoining TOD;
- Careful phasing; and
- Public-private collaboration and the development of successful partnerships, including the establishment of the appropriate risk and revenue sharing mechanisms.

In order to minimize the negative impacts, CBRE Consulting has identified several potential mitigation options for the proposed Honolulu project, including the following:

During construction:

- Provide advertising dollars to inform community of construction activity and business operating hours
- Provide clear street signage for ingress/egress to business locations
- Provide direct financial assistance/low interest loans to businesses
- Sequencing construction to minimize removal of multiple blocks of street parking
- Provide advance notification to businesses and residents of traffic detours/delays and possible utility interruptions
- Implement cleaning program to regularly remove dirt and debris

After construction:

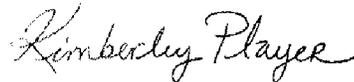
- Work with land owners and consultants to increase residential and commercial land use density within ¼ mile of select stations to promote effective transit oriented development and increase ridership
- Redesign stations for central platform or one-sided platform to avoid creating 200-300 foot long tunnel effect at street level
- Integrate station design/construction with new development
- Provide secure parking at more stations and integrate with commercial development
- Ensure thoughtful Right-of-way acquisition so that acquisitions avoid leaving unusable out parcels.
- Provide compensation to residential property owners immediately adjacent to the elevated line
- Use landscaping /security fencing to minimize ability to assemble underneath the elevated rail lines
- Provide security cameras and increase police patrols to minimize vagrancy
- Provide as many left turn lanes as possible to allow access to local businesses
- Create sound barriers
- Provide assistance to individual property owners (e.g. rebates) for mitigation improvements (double glazed windows, fences etc)
- Fund public amenities around stations such as parks, community/cultural facilities, public art etc. (e.g., Metrotown)
- Restrict a "Fare Paid" area, i.e., riders must produce tickets to pass through gates vs. riding on the "honor system" like SkyTrain.

If you have any questions please do not hesitate to contact us at 213-613-3751.

Respectfully Submitted,



Thomas R. Jirovsky
Senior Managing Director



Kimberley J. Player
Managing Director



KAMEHAMEHA SCHOOLS

February 6, 2009

Mr. Ted Matley
U.S. Department of Transportation
Federal Transit Administration – 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, HI 96813

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

Dear Messrs. Matley and Yoshioka:

Thank you for the opportunity to comment on the DEIS for the Project.

As a brief background, Kamehameha Schools (“KS”) is a charitable educational trust, founded in 1887 through the Will and Estate of Princess Bernice Pauahi Bishop, whose mission is to provide educational opportunities to improve the capability and well-being of Native Hawaiians. KS currently offers a wide range of educational programs and services, including K-12 campus programs, preschools, financial aid, outreach programs, community education and collaborations with schools and community organizations. This past year, KS’ programs and services reached more than 38,000 Native Hawaiian children and families.

In addition to providing educational programs and services, KS owns and maintains, as an important part of its ancestral and cultural legacy, over 365,000 acres of privately-held lands in Hawai‘i. These lands are part of an endowment that provides the financial resources necessary to support these educational services and programs. As a Native Hawaiian educational organization, landowner and community member, KS has worked and continues to strive to work collaboratively with government, businesses, community organizations and others on solutions to the difficult challenges facing our families and communities, such as education, employment, housing, energy, food supply, sustainability, transportation and quality of life.

KS supports a rail transit system on Oahu as a long-term transportation solution. A rail transit system can provide a tremendous benefit to our communities by alleviating traffic congestion, reducing the use of fossil fuels, curbing urban sprawl, spurring development of communities and revitalizing our economy. We commend the City and County of Honolulu and the Federal Transit Administration for their hard work in initiating and carrying forward this important transit project and are appreciative of the extensive effort of our City leaders and their staff to study and publicize the impacts of this project.

567 South King Street • Honolulu, Hawai‘i 96813-3036 • Phone 808-523-6200

Founded and Endowed by the Legacy of Princess Bernice Pauahi Bishop

Letter to Messrs. Matley and Yoshioka
February 6, 2009
Page 2 of 2

We received a copy of the DEIS for the Project and understand that our role or kuleana in this prescribed process is to review the DEIS and provide productive comments to help best assure the Project's successful completion. We have taken this responsibility seriously. We met with tenants and other business owners and operators on KS lands who occupy properties potentially affected by the Project to become familiar with their concerns and interests. We also retained consultants to provide us with an independent review of specific aspects of the Project. The review of the thousands of pages of highly technical materials of the DEIS has taken time, and we appreciate your efforts in providing an extension of time for responses. It has made a meaningful difference in the quality of our review.

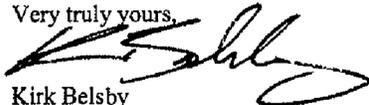
From this review, we have found many positive aspects to the DEIS and the proposed system. We have also identified, which is understandable in a document of this complexity, some items that we believe require additional study and work. In preparing our comments on those items, we have considered the potential impacts to our lands and our ability to continue to fulfill our educational mission with the returns generated from our lands; the potential impacts on the hundreds of small-and large business tenants and individuals on our lands; the potential impacts on communities where KS is diligently planning redevelopment and revitalization measures; and as appropriate, the broader potential impacts on our communities and families. In addition, we have tried to make our comments specific, productive and solution-oriented so that you may more easily address concerns with the appropriate particulars and move ahead with a successful project.

Our comments to the DEIS are set forth in full in Attachment A to this letter.

We thank you again for the opportunity to participate in this process and look forward to continuing to work collaboratively with the City to help assure the timely success of this important project, which will benefit our families and communities for many generations.

Mahalo.

Very truly yours,



Kirk Belsby
Vice President, Endowment
Kamehameha Schools

Enclosures

ATTACHMENT A

Kamehameha Schools (“KS”) appreciates the opportunity to comment on the Draft Environmental Impact Statement/Section 4(f) Evaluation (“DEIS”) for the Honolulu High-Capacity Transit Corridor Project (“Project”) prepared by the City and County of Honolulu (the “City”) Department of Transportation Services (“DTS”) and the Federal Transit Administration (“FTA”). In order to provide comments that are helpful toward the success of the Project, KS retained consultants to conduct in-depth assessments of specific aspects of the Project. UltraSystems Environmental (“UltraSystems”) was retained to provide a technical review of the Project and CBRE Consulting, Inc. (“CBRE”) was retained to analyze the economic impact of the proposed Project. This process has enabled KS to offer the following comments on the Project and the DEIS.

I. IMPACTS OF CONSTRUCTION ON BUSINESSES

KS estimates that construction of the Project could affect over one hundred of its properties and approximately one thousand of its tenants and sub-tenants, and their businesses.¹ Research by CBRE indicates that businesses along the construction routes of major rail systems experience significant losses. While some disruption during construction is unavoidable, losses can be minimized if positive mitigation measures are taken.

A. Physical Impacts

Comment #1: Construction activities could have substantial economic impacts on businesses and more specific discussion of the construction impacts and proposed mitigation measures is requested.

1. **Information.** Although section 4.17 of the DEIS contains a discussion of construction phasing effects, a more detailed discussion of anticipated construction impacts and the scheduling of construction activity would help businesses understand the full extent of construction-related impacts. Information such as the following is requested: (a) the number of businesses directly affected by construction activity (*i.e.*, businesses located adjacent to a construction site and on property to be acquired by the City) and indirectly affected (*i.e.*, within one mile of a construction site), (b) for various segments of the line, a more detailed estimate of the length of the construction period from commencement to conclusion of construction, including any time needed to relocate utilities prior to the commencement of construction on the actual rail system, and (c) the proposed location of construction barriers, the amount of time that barriers will be in place, specific land and street closings, and rerouted traffic patterns during construction.

2. **Concerns about Construction Activity.** KS shares in the concern noted in the DEIS that construction will disrupt traffic and limit access to and from businesses in various ways. See DEIS section 3.5.3 at 3-46 and section 4.17.1 at 4-153 to -154. In some cases, direct access to businesses will be lost or curtailed. Construction will also result in loss of available parking.² The erection of fences around construction sites will diminish the visibility of certain businesses, thus reducing customer traffic. Even if a business maintains visibility during construction, there is a general tendency for people to avoid aesthetically unappealing construction sites, or avoid construction areas where traffic flow will be seriously compromised. KS is also concerned that construction will disrupt utility service during the length of the construction period, which KS understands could last from one to five years. More detail of these impacts by neighborhood is requested.

3. **Mitigation Measures.** The DEIS proposes a mitigation plan that touches upon some of the physical impacts of construction. The DEIS states that a Maintenance of Traffic (“MOT”) Plan and

Transit Mitigation Plan (“*TMP*”) will be developed to identify measures to mitigate temporary construction-related effects on transportation. See DEIS section 3.5.7 at 3-48. The DEIS discusses the goals that the MOT Plan and TMP should achieve. Building upon that discussion, the objectives of the MOT Plan and TMP could be advanced by inclusion of the following:

(a) Agreements by project construction contractors that they will (i) ensure by necessary means (including phasing of the work) that access to businesses in the project area be maintained during project construction activities, (ii) coordinate the timing of temporary facility closures to minimize impacts to business activities in the project area—especially those with seasonal or high sales periods, (iii) minimize, as practical, the duration of modified or lost access to businesses in the project area, (iv) provide advance notice when utilities are to be disrupted especially if disruptions will be during regular business hours, and schedule major utility shut-offs during non-business hours; (v) keep roadways as clean as possible by using street sweepers and wheel washers to minimize off-site tracking; (vi) during dry periods, apply water to exposed soils to minimize airborne sediment; (vii) properly maintain construction equipment to minimize unnecessary exhaust; (viii) locate stockpile areas in less visibly-sensitive areas and, wherever possible, place them in areas that are not visible from the road, or by residents and businesses; (ix) remove visibly obtrusive erosion-control devices (e.g., silt fences, plastic ground cover, and straw bales) as soon as an area has been stabilized; (x) replace street trees and other vegetation that must be removed with appropriately sized vegetation; (xi) to the extent feasible, have the concrete decking along the cut-and-cover segments installed flush with the existing street or sidewalk levels; (xii) wherever feasible, maintain sidewalks at their current width during construction and where a sidewalk must be temporarily narrowed during construction (e.g., deck installation), restore to its current width during the balance of the construction period; (xiii) construct site fencing of good quality, capable of supporting the accidental application of the weight of an adult without collapse or major deformation; (xiv) where major boulevards must be fenced, offer the business owners the opportunity to request covered walkways in lieu of chain-link fencing; (xv) where covered walkways or solid surface fences are installed, implement a program to allow for art work (e.g., by local students) on the surface; and (xvi) where used, maintain in clean repair chain link fences.

(b) Provisions for public information campaigns to inform the community that businesses are open during project construction activities to encourage their continued patronage, including advertising of businesses.

(c) Provision for a public involvement plan prior to the beginning of project construction to inform business owners of the project construction schedule and activities and to understand their needs, and to appropriately address them, including (i) interviews of individual businesses potentially affected by construction activities to understand how these businesses carry out their work, and (ii) identifying business usage, delivery, and shipping patterns and critical times of the day and year for business activities, as well as alternate access routes to maintain critical business activities.

(d) Provisions for a program to (i) convey construction information to the community, (ii) provide public information (e.g., press releases or newsletters) regarding construction activities and ongoing business activities, (iii) enable the community to “speak” to the appropriate persons at the FTA and the Rapid Transit Division of DTS (“*RTD*”) during construction with a specific process for responding to community concerns in a timely manner, and (iv) install appropriate signage and lighting, and display other information to indicate that businesses in the construction area are open, and to direct both pedestrian and vehicular traffic to businesses via alternate routes.

(e) Provisions for a Business Disruption Mitigation Plan (“*BDMP*”) whereby the FTA and RTD will work with community residents, elected officials, local businesses, and community

organizations to tailor the mitigation program to meet community needs prior to the commencement of construction activities. KS requests that the BDMP (i) include remedies for business owners if the measures in the BDMP are not observed, (ii) be readily available for public review, (iii) have a process to inform the public of its progress in implementing the measures identified through a quarterly program of auditing, monitoring, and reporting, (iv) identify a staff person to work directly with the public to resolve construction-related problems, (v) provide for a field office during construction of the Project to address the matters described above, (vi) provide for an information and voice mail telephone line for community members and businesses to express their views regarding construction, with calls received reviewed by FTA and RTD staff and, as appropriate, forwarded to the necessary party for action (e.g., utility company, fire department, resident engineer in charge of construction operations), and (v) provide for traffic management plans as described above.

B. Economic Impacts

Comment #2: KS requests that the discussion of economic impacts in the DEIS be expanded through an independent study and recommends certain mitigation measures.

1. Impact on Businesses. KS requests expansion of the economics impact analysis in the DEIS.³ Presently, the DEIS provides discussion on (a) the effect of the Project on regional economics in the study corridor, including employment trends, growth, and real property tax; (b) the effect of construction on land use and economic activity; and (c) indirect effects of the Project on economic development, particularly focused on opportunities for transit-supportive development (“TSD”) and transit-oriented development (“TOD”). KS suggests supplementing the discussion with an analysis of the economic impacts of the Project (both during and after construction) from the perspective of businesses and property owners along the rail line. For example, the impact of business closures or revenue losses should be added to the economic impacts analysis. As discussed further below, research conducted by KS’ consultants regarding other transit projects indicates that construction of the Project could lead to the demise of a significant number of businesses.

Case studies of other major rail systems indicate that businesses situated along and surrounding the construction route can experience significant losses such as declines in customer numbers, sales, and in some cases, the closure of businesses. One of the most dramatic cases of this type of negative impact was in Salt Lake City, where an estimated 30 percent of local businesses closed during the construction of the TRAX system, and there were no mitigation strategies planned beforehand to reduce the impact on the businesses.

A similar situation occurred during the construction of SkyTrain’s Canada Line in Vancouver. No public subsidies were provided to retailers and some businesses claimed that revenues dropped by 70 percent. On average, 40 to 60 percent losses in revenue have been reported. As of 2007, less than a year into construction, it was reported that between 40 and 60 businesses along the line had closed, with more likely to follow, as completion of the project is not expected until 2009.

If the Project will have similar economic impacts as the case studies discussed above, the economic loss to KS, its tenants, and their businesses will be significant. Negative impacts of construction could be further exacerbated due to the current economic climate that is already challenging the viability of many businesses.

2. Independent Study. In light of the physical and economic impacts referenced above, KS requests that the City retain an independent urban economist to conduct a study of the economic impacts of the Project both during and after construction. The geographic scope of the study should extend beyond the areas immediately adjacent to construction because the impacts can have a blighting

effect on the surrounding community as well. The independent analysis should be based on case studies and empirical data taken from other communities with particular emphasis given to elevated transit systems similar to that proposed for Honolulu. It would also be helpful to study alternative systems (e.g., at-grade) and routes to determine if these alternatives mitigate the expected pre- and post-construction impacts.⁴ KS requests that the public, which has not had the opportunity to review the items, be given the opportunity to review and comment on the study before it is incorporated into the Final EIS.

3. Public Assistance Programs and Other Mitigation Measures. Case studies indicate that public assistance is essential to keeping businesses viable during construction. During the construction of Interstate MAX-Yellow, an extension to Portland's light rail network, the transit agency Tri-Met and Cascadia Revolving Fund came together to provide assistance to affected businesses. The businesses who received assistance had to demonstrate that the construction had negatively impacted their business revenues. The success of this program is illustrated by the fact that during construction, *only one business of the 106 businesses located along the length of the light rail route closed as a direct result of construction, and only two businesses moved to another location.* For the development of another extension of the light rail line, Tri-Met started the Business Support program for ground-floor retail businesses along the light rail construction route that may be disrupted due to their reliance on established pedestrian and transit traffic.

Salt Lake City is an example of a city that has learned from its experience of not investing in a public assistance program. When Salt Lake City built its first light rail line in 1999, nearly 30% of the businesses along the rail line closed. No mitigation strategies were planned beforehand to reduce the impact on the businesses. When the University Line extension was built in 2001, however, Salt Lake City sponsored a low interest loan program available to impacted businesses, which materially reduced business closures and economic impacts.

The case studies above highlight that well-conceived mitigation and public assistance can be effective in keeping businesses intact. Programs that we respectfully request for consideration include:

- Outright assistance
- Relocation assistance
- Rent subsidies
- Property owner compensation for lost rents
- Publicly funded business advertising and promotions
- Temporary real property tax relief

II. POTENTIAL PARKING IMPACTS OF COMPLETED SYSTEM

Availability of parking is important to the success or failure of the Project. Transit users who drive to stations will require parking or else be deterred from using the rail system. Thus, KS recommends that the City study and estimate the amount of parking that will be available to rail users and motorists in areas near transit stations after the Project is built.

A. Potential Parking Impacts

Comment #3: Inadequate parking for the Project will have economic consequences on surrounding businesses and properties.

U.S. transit systems often encounter problems with providing enough off-street parking and park-and-ride lots. This results in various adverse impacts to owners with businesses and properties located near transit stations.

First, transit riders may be forced to find on-street parking, thus increasing traffic congestion in the area surrounding a transit station and/or park-and-ride lots, disrupting traffic flow, and reducing the number of street parking spaces available for non-transit users. Scarcity of parking can also be a deterrent to use of the rail system.

Second, transit users might park illegally in private retail and business parking areas, thus limiting further actual customer parking and/or increasing the cost of parking enforcement for business and property owners. An overall reduction in the amount of available parking spaces either on the street or in dedicated customer parking will discourage customers from patronizing businesses in the area.

Third, the uncertainty of the supply of parking negatively affects property owner redevelopment plans due to (i) concerns that additional lands may be condemned to provide for parking if ridership forecasts are achieved (or if ridership forecasts are not achieved and the agency determines a lack of parking availability to be the cause), or (ii) concerns that private property owners will be forced to mitigate the parking shortfall without public assistance. As acknowledged in the *Land Use Technical Report Honolulu High-Capacity Transit Corridor Project* (RTD 2008b) dated August 15, 2008 ("*Land Use Technical Report*"), KS owns many properties near the proposed Pearlridge, Kapalama, Kaka'ako, and Mo'ili'ili stations and intends to engage in redevelopment of those properties when the current leases expire. *See Land Use Technical Report* at 5-2 to 5-11. Therefore, these are important concerns to KS.

KS offers the following comments to assist the City in the refinement of its parking plans:

1. **Quantify parking needs at each transit station in the Final EIS:** Planning for parking needs begins with quantifying the number of parking stalls required for each rail station.
2. **Kapalama Station:** It appears that the City does not plan to build additional parking spaces for users of the Kapalama Station. *See* DEIS at 2-31. It is unclear where users who drive to this station can park. KS requests that the Final EIS discuss the impact on commercial tenants adjacent to this station if no off-street parking is provided to station users and the empirical basis for the determination that no station parking facilities are required.
3. **Dillingham Boulevard from Kohou Street to the rear parking lot of Costco:** On the mauka side of the roadway, the DEIS provides that all through and left-turn lanes would be preserved by acquiring 10 feet of additional right-of-way on the makai side of the roadway. What traffic impact will the acquisition of an additional right-of-way have on parking for existing land uses where ROW is acquired and what mitigation is proposed? *See Transportation Technical Report Honolulu High-Capacity Transit Corridor Project* (2008a) dated August 15, 2008 ("*Transportation Technical Report*"), Table 5-32, at 5-85.
4. **Halekauwila Street from Nimitz Highway to Ward Avenue:** Most of the existing on-street parking would be removed. What impact would this have on existing off-street parking spaces for the commercial uses located along Halekauwila Street and what mitigation is proposed? *See Transportation Technical Report*, Table 5-33, at 5-86.
5. **Dillingham Boulevard from McNeill Street to Kohou Street:** Twenty-six off-street parking spaces would be lost on Dillingham Boulevard between McNeill Street to Waiakamilo Road due to fixed guideway column placement in the median. Ten off-street parking spaces would be lost on Dillingham Boulevard between Waiakamilo Road to Kohou Street due to fixed guideway column placement on the side. *See Transportation Technical Report*, Table 5-54, at 5-114. The loss of off-street parking could impact customer and employee parking at Waiakamilo Shopping Center and buildings on both sides of Dillingham. KS requests that the Final EIS discuss the impact of the loss of these off-street

parking spaces on the commercial uses located on KS lands along Dillingham Boulevard and any proposed mitigation.

6. **Halekauwila Street from Keawe Street to Coral Street:** Sixteen on-street mauka and 22 on-street makai parking spaces would be lost on Halekauwila Street between Keawe Street to Coral Street due to fixed guideway column placement on the side. *See Transportation Technical Report*, Table 5-54, at 5-114. KS requests that the Final EIS discuss the impact of the loss of these on-street parking spaces on businesses located on KS owned properties and any mitigation proposed.

B. Mitigation Measures For Parking

Comment #4: The City is requested to develop more specific mitigation measures for parking.

KS notes that mitigation measures were included in the DEIS to address this issue, including the establishment of a neighborhood parking plan, but KS suggests the following additional measures:

1. **Early planning.** The DEIS appears to contemplate developing mitigation strategies for parking after significant commitments of resources have been made for the design and construction of each transit station. This is indicated by the fact that section 3.4.5 of the DEIS states that mitigation strategies for parking would be determined by surveying stakeholders within six months before implementation of fixed guideway service. *See* DEIS at 3-44. KS requests that specific parking strategies be devised and studied as part of this environmental review process.

2. **Parking study.** To ensure that parking impacts are fully addressed in the Final EIS, KS recommends a detailed parking study be performed for each transit stop that is predicated on the level of transit use occurring at each station and validating through more rigorous analysis how these users will access the site (e.g., pedestrian access, transit access or vehicular access). Once the study is concluded, specific mitigation measures should be developed based on the results of the study and incorporated into the Final EIS.

3. **District parking solution.** District parking garages could be developed near rail stops and paid for through transit system funding. Such systems should be located with a view toward improving transit use and facilitating redevelopment within TOD corridors.

4. **Public assistance for building parking structures.** A program of subsidies, grants, or other assistance for the construction of parking structures could be provided. For example, Portland recently approved a \$6.6 million subsidy for a parking garage for a TOD.

5. **Signage and parking permit program.** Adequate signage could be installed during and after construction for transit-parking areas and alternate business parking areas. A parking permit program could be created for on-street parking to limit impacts on local businesses by transit users monopolizing on-street parking.

**III. IMPACTS OF COMPLETED SYSTEM ON BUSINESSES ALONG
RAIL LINE AND AT TRANSIT STATIONS**

KS owns properties containing approximately 229 acres in communities that would be directly affected by the rail system along Farrington Highway, Kamehameha Highway, Dillingham Boulevard, and Halekauwila Street in Kaka'ako. KS is concerned that the Project will affect visibility of and access to the businesses on KS' properties; limit the redevelopment options available to KS and other landowners; and narrow streets, among other impacts.

A. Physical Impacts

1. Traffic, Visibility, and Access to Businesses

Comment #5: A more detailed assessment of the reduction in visibility and access to businesses and potential mitigation measures is requested.

a. Visibility. Presently, a significant percentage of KS' land holdings along the Project route are used for retail. Retail properties require good visibility to be successful. As the DEIS acknowledges on page 4-59, "[b]usiness owners have a vested interest in the visual environment surrounding their operations." KS is concerned that the elevated guideway will substantially reduce the visibility of businesses from the street level. As such, the discussion of visual impacts in the DEIS⁵ should be expanded beyond impacts on views of "landmarks, significant views and vistas, historical and cultural sites, and Exceptional Trees." DEIS at 4-59. Impacts to visibility of businesses located along the rail line also should be considered.

b. Access. Businesses also depend on convenient access to and from their properties. The erection of the elevated guideway and its supporting columns, however, will eliminate left turn lanes, thus cutting off direct access to many businesses, requiring potential customers to take a circuitous route. Traffic patterns and the level of service in affected areas might change as a result. Added congestion would further discourage customers from visiting businesses along the guideway. As a related matter, to the extent the Project permanently eliminates existing street parking due to placement of the transit guideway, all of the parking-related impacts noted in **Comment #3** above become issues. Again, the number of parking spaces needed for each transit station needs to be determined carefully to prevent loss of business due to customer parking being occupied by transit users.

c. Narrower Lanes. The DEIS notes that in certain places, the widening of existing street medians to accommodate the columns would require reducing lane widths. See DEIS, Table 3-21, at 3-39; *Transportation Technical Report*, Table 5-29, at 5-80. Narrowing of lanes could increase the risk of traffic accidents. KS suggests that the Final EIS study such risk. KS specifically requests more information on the impact of reduction in lane widths to traffic on the following roadways that are aligned next to its properties, including (a) Farrington Highway and Waipahu Depot Road; (b) Kamehameha Highway and Kuleana Road; (c) Kamehameha Highway and Ka'ahumanu Road; (d) Kamehameha Highway and Kaonohi Street; (e) Kamehameha Highway and Lipoa Place; and (f) Kamehameha Highway and Pali Momi Street. A discussion of the impacts of lane narrowing on industrial uses (travel of large vehicles such as semi-trucks) in the Final EIS is particularly needed given the industrial uses in many of the impacted communities.

d. Mitigation. KS requests adoption of a mitigation plan that will (a) ensure there is adequate parking near transit stations; (b) maintain access to and from businesses; (c) maintain traffic circulation; (d) prevent traffic accidents; and (e) minimize loss of visibility due to the elevated system. To achieve these objectives, a detailed mitigation plan incorporating specific initiatives should be developed and incorporated as part of the Final EIS. Examples of the types of elements that might be incorporated into the mitigation plan include: (i) traffic signals with protected left turns at busy intersections; (ii) elongated left turning lanes off of the main roadways to accommodate the increase in motorists utilizing left turn lanes at busy intersections, and to alleviate backup along the main roadways; (iii) district parking near rail stops paid for through transit system funding; and (iv) update and supplement the traffic study contained in the *Transportation Technical Report* to address the comments stated above.

2. Noise and Vibrations

Comment #6: Disclosure of noise and vibrations and their impact according to time of day.

It is our understanding that the noise analysis contained in the DEIS is based upon average hourly noise impacts rather than noise impacts at different times of the day. However, noise impacts can vary in significance depending on the time of day. For example, the impacts relative to background conditions may be more significant between 4:00 a.m. and 6:00 a.m. than during mid-day periods. Because these time-of-day differences may impact current and future uses differently, more complete disclosure of noise impacts by time of day is needed.

Assuming the DEIS used the noise impact criteria in the FTA's *Transit Noise and Vibration Impact Assessment* manual as the standard against which to evaluate noise exposures due to the Project, the impacts of noise on commercial should be studied further.

The noise sampling methodology utilized in the DEIS appears to be specific to ground level impacts. Because sound rises, there will be greater impacts on buildings (either existing or to be constructed in the future) that are constructed at heights above the proposed rail line. KS could not find discussion of these conditions in the DEIS and how the noise impacts of an elevated system might affect the viability of future TOD proximate to the rail line, particularly for uses that are noise sensitive such as residential.

3. Security, Transients, and Crime

Comment #7: Additional disclosures on security, transients, and crime are requested with more specific mitigation measures.

The Final EIS should disclose that in urban areas with hot and wet climates, such as Miami and Honolulu, elevated lines can provide shelter for the homeless, increasing crime and litter and thereby detract from commercial activity and result in lower property values. Transit stations also tend to attract graffiti.

The availability of parking and safety are interrelated issues. If parking is not available near transit stations, riders will need to find off-street parking within the district or travel to stations by walking. Without addressing the issue of security patrolling and providing ample parking in safe areas, riders will not want to park multiple blocks away and walk, especially at night, in order to get to and from the rail station and their vehicles.

The DEIS does not detail mitigation options to reduce concerns raised about area crime, property vandalism and an increase in transient persons using the elevated system as temporary shelter. KS requests the Final EIS provide specific mitigation actions to be undertaken. The mitigation measures could include: (a) use of landscaping and/or security fencing to minimize the ability of transients to assemble underneath the elevated rail lines; (b) adequate security on staff (dedicated security and/or Honolulu police) to patrol the stations and surrounding areas; (c) installation of surveillance cameras and equipment, emergency call boxes, and closed-circuit television monitoring; (d) locating police neighborhood substations at transit stations; (e) conducting regular maintenance and cleaning of areas under the rail line, transit stations, and surrounding areas; and (f) designing and installing structures underneath elevated rail lines that would discourage or prevent loitering by transients.

4. Visual and Aesthetic Impacts

Comment #8: The elevated system will cause visual blight and additional details on visual and aesthetic impacts for evaluation by viewer groups would allow a more complete analysis.

a. **Visual Blight.** An elevated system with platforms will cause visual blight. The elevated guideway will also cast shadows on adjacent buildings, reducing visibility. Glare and excessive lights from the rail line could adversely impact certain businesses during the day. Visual blight will also occur from deterioration of the system over time. These visual and aesthetic impacts may reduce tenant or customer interest in the area, increase turnover, and decrease property values. Thus, KS requests that the Final EIS include discussion of the estimated economic loss that visual impacts will cause, specific measures for mitigating such impacts, and the mechanisms for soliciting public input on mitigation measures.

b. Expanding Study.

i. The *Visual and Aesthetics Resources Technical Report Honolulu High-Capacity Transit Corridor Project* (2008e) dated August 15, 2008 (the "*Visual and Aesthetics Resources Technical Report*") utilized the methodology of the Visual Impact Assessment for Highway Projects⁶ of the Federal Highway Administration ("*FHWA*") for the Project since it is a linear transportation facility comparable to a highway, has a similar range of issues, and because the FTA has not issued comparable guidance. The *Visual and Aesthetics Resources Technical Report* discusses how viewer groups have been categorized (*i.e.*, residents, commuter, etc.) and indicates that viewer response to change is impacted by viewer exposure and viewer sensitivity. See *Visual and Aesthetics Resources Technical Report* at 3-2. However, the analysis provided in section 5.0 (Consequences) of the technical report contains few to no details regarding user group exposure to project alternatives for different user groups, including such factors as location, duration, and distance. KS suggests that the Final EIS provide additional clarification regarding viewer exposure and viewer sensitivity for the selected view points. We recommend that the viewer exposure response include focus groups and outreach that encompasses a broad range of stakeholders. Property owners are not included among the five user groups asked to comment on visual impacts, but should be.

ii. The expanded study should also provide 360-degree visuals for multiple cross-sections of the rail line with particular emphasis given to transit stops. To provide representative visual imagery of the Project, such 360-degree studies should include areas within the urban core and areas within the suburban landscape. We would also recommend showing these images at multiple levels for each representative cross-section, including at street grade and at elevations of 2 to 3 stories.

c. **Utility Relocation.** The DEIS notes that the Project would involve relocation and modification of existing utilities. See DEIS at 4-38. KS is concerned about the impacts that relocating above ground power and telephone lines will have on existing commercial properties that are located on KS owned land in the Dillingham Plaza area and the area to the north and south of this property. Since ten feet of land in front of these commercial uses will be acquired to allow for widening of the median in this street, it is assumed that existing above-ground poles and power/telephone lines along this street will be moved back ten feet, bringing them even closer to these commercial uses, which include the Boulevard Saimin restaurant,⁷ Sizzler restaurant, Burger King fast food restaurant, Popeye's Chicken fast food restaurant, and other uses along this street. Bringing utility lines even closer to existing commercial uses will detract from the appearance of these uses and limit access to the properties and the ability to maintain the properties in good repair.

d. **Other Mitigation Measures.** The *Visual and Aesthetics Resources Technical Report* does identify a number of principles for minimizing, reducing, or mitigating impacts, including those related to construction. See *Visual and Aesthetics Resources Technical Report* at 6-1 to 6-2. KS generally agrees with the stated objectives, but recommends development of specific mitigation actions that will ensure substantive results. The following are the types of specific and measurable mitigation actions that could be included, although a more detailed list should be developed as these measures below would address only a limited number of the expected impacts that will arise: (a) consultation with the communities surrounding each station for input on station design elements; (b) cooperative agreements with adjacent property owners that would improve the Project's visual quality; (c) where practicable, retention of existing street trees along sidewalks and in medians, or plant new vegetation to help soften the visual appearance of project elements (e.g., stations, guideway columns, and TPSSs); and (d) use of source shielding in exterior lighting at stations and ancillary facilities such as the maintenance and storage facility and park-and-ride lots, to ensure that light sources (such as bulbs) would not be directly visible from residences, streets, and highways, and to limit spillover light and glare in residential areas.

B. Economic Impacts

1. Business Impacts

Comment #9: KS requests that the discussion in the DEIS of the economic impacts of the completed system on businesses be expanded through an independent study.

As noted in Section I above, KS requests that the Final EIS incorporate an expanded study of the economic impacts of the Project on businesses conducted by an independent urban economist. In addition to analyzing the impact of construction on businesses, the study should include an assessment of the business impacts of the completed system across a range of property types along the rail line. The analysis should result in quantifiable projections of lost revenue for current and future uses along such systems (both at transit stop locations and between transit stop locations), and business failures, and should be based on case studies of other jurisdictions where an elevated heavy rail technology is chosen rather than a light rail at-grade system. It might also be helpful to analyze the impacts of other rail systems (e.g., at-grade systems) and routes to compare the relative impacts of these alternatives. Once the impacts are identified using these empirical methodologies, the Final EIS should detail mitigation options and how these mitigation options reduce impacts on businesses.

2. Redevelopment

Comment #10: Elevated rail systems affect redevelopment options in the urban core and require additional mitigation measures

An elevated rail system will affect KS' and other landowners' redevelopment plans by limiting the kinds of projects that can be feasibly built on lands adjacent to the rail line. New buildings constructed along the rail line would have to plan around blocked viewplanes, noise emanating directly from trains, and the aesthetics of an elevated line and transit station. To compensate for the low demand for second or third level residential or office space and restricted view planes, buildings would have to be constructed at a minimum height if adjacent to the rail system. This will, of necessity, require greater verticality in future redevelopment, which will have broader community impacts and increase construction costs.

One example of the impact of buildings adjacent to elevated rail lines is the Los Angeles Green Line. A portion of the Green Line runs on an elevated line with several stations near major office buildings and hotel projects. The elevated portion is similar to the Project, except that it is no more than

25-30 feet above grade, and the concrete Y-beam is only 24-25 feet wide. There are no retail properties along the route. One office building constructed in 1993 at the intersection of Rosecrans Avenue and Aviation Boulevard was located within 40 feet of the building's curtain wall. As a result of the obstructed view and noise, the developer experienced significant difficulty in leasing the office space on the second and third floors of the building's northeast corner. This space was the last to be leased, with the space remaining vacant for three years.

If an elevated system is selected, KS expects that buildings occupied by residents, tenants, or businesses would need to be set back to attenuate the effects of the adjacent rail system. Buildings would also be constructed on platforms above the rail line to compensate for noise, visual, and aesthetic impacts. As a result, construction costs would increase due to the increased height and the use of more expensive materials to provide soundproofing, and the potentially larger building area. These constraints effectively narrow the range of redevelopment options. It could be cost prohibitive, for example, to build relatively affordable residential units on lands fronting the rail line.

KS requests that the Final EIS analyze in greater detail the impacts of an elevated system on redevelopment. Since there are multiple references in the technical reports that future TOD could mitigate some of the negative conditions created by the transit line, we recommend that the Final EIS incorporate input from urban planning professionals, including a working group(s) from the Hawaii Chapter of the American Planning Association, the American Institute of Architects, the Urban Land Institute, or similar organization(s).

In a similar vein, KS recommends that the analysis of Project impacts on property values be revised and expanded to address the points in these comments. The DEIS anticipates that the Project will lead to an increase in property values due to the desirability of access to transit and TOD opportunities. KS' consultant's research indicates that such results may not necessarily be achieved. Further, in situations where desirable value outcomes are achieved, they seemed to have occurred in systems that are not comparable to the Project, such as at-grade designs.

IV. COST AND FINANCIAL ANALYSIS

Comment #11: Further study of the financial feasibility of the DEIS is suggested.

As a member of the community, KS has an interest in seeing that the feasibility of an economic undertaking as significant as the Project is thoroughly studied and based upon reliable data. The initial financial projections for the Project reported in Chapter 6 of the DEIS may not have taken into account (a) the recent economic downturn, the duration or severity of which is unknown, (b) potential additional project costs that may be necessary to mitigate impacts of the Project, including those items identified in this letter, (c) the State's recent announcement of major highway improvement projects intended to ease traffic congestion, which may affect ridership projections, and (d) cost overruns beyond the control of the governmental agency, which were experienced by other large-scale projects. In light of, and in evaluating, these types of financial issues, KS respectfully suggests that the City consider alternatives to building an elevated system. As discussed below in Section IX, building an at-grade system through at least portions of the route could be less expensive, may achieve the same transit objectives as an elevated system, and could also eliminate many of the impacts discussed in this letter.

V. IMPACTS OF LAND ACQUISITIONS ON KS, ITS TENANTS AND THEIR BUSINESSES

Condemnation or an acquisition by the power of eminent domain of KS' legacy lands, even partial acquisitions, impact KS, its tenants, and their businesses. More information on what areas and

interests will be acquired, when they will occur, and what interests will be compensated for would be helpful to KS and its tenants.

Comment #12: KS requests more specific information on what will be acquired by the City and the impact of such acquisitions and compensation to be provided. Such information should assist KS and its tenants in evaluating how the acquisitions will affect their businesses.

1. **Additional Information.** The DEIS' recognition of the procedures for acquiring and compensating for properties taken and the disclosures to be made are helpful.⁸ The *Real Estate Acquisition Management Plan* (RTD 2008q) (the "**RAMP**") is detailed and provides certain procedural protections. However, more specific information on the acquisitions and impacts of such acquisitions would assist KS and its tenants in evaluating how the acquisitions will affect their businesses, such as, (a) information on the size of the area that will be acquired, the size of the remaining area not being acquired⁹, and the type of interest to be acquired¹⁰; and (b) confirmation that KS' and its lessees' buildings and other improvements will not be taken.

2. **Goodwill.** Businesses, especially small businesses operating from a location for many years, may develop valuable goodwill. "Goodwill" has been described as the benefits to a business as a result of its location, reputation for dependability, skill, or quality, and any other circumstances resulting in probable retention of old or acquisition of new patronage. The Model Eminent Domain Code and California's statute (Deering's California Codes Civil Procedure § 1263.510) provide for compensation to a business owner for the loss of goodwill. Neither the DEIS nor the RAMP discusses compensating a business owner for the loss of goodwill resulting from a full or partial acquisition (whether or not required by the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act (CFR 1989) or other applicable statutory and case law). KS wishes to know whether the City intends to compensate a business owner for the loss of goodwill if the owner has to move because of reasons such as adverse impacts from construction activities, or the operation of the rail line, near the business.

4. **Economic Unit.** On a partial taking, it would seem to make sense to have parcels of land treated as a single parcel of land if they (a) are generally contiguous, (b) are in substantially identical ownership, and (c) are being used, or are reasonably suitable and available for use in the reasonably foreseeable future, for their highest and best use as an integrated economic unit.¹¹ That way, landowners and businesses are able to receive compensation for the diminution in value of the remainder parcel (the entire parcel excluding the portion acquired by the City) as the result of the Project. Clear guidance in the Final EIS on the treatment of parcels used as an economic unit and compensation for devaluation of the property not taken would assist KS, its tenants, and their business in evaluating whether they will bear a disproportionate burden of the impacts of the Project.

5. **Consequences.** The RAMP discusses the procedures for compensating property owners and businesses affected by full and partial acquisitions, however, KS' tenants and their businesses will be adversely affected if payments are delayed. In any such event, the aggrieved business owner has limited recourse against the City.¹² Consequently, it is suggested that the City consider including in the Final EIS a timetable for the City's compliance with the real estate process outlined in Appendix W and other portions of the RAMP (including the prompt payment of compensation after an agreement is reached) and measures to mitigate such harm caused to landowners and businesses such as a schedule of delay damages payable to the affected parties, interest on the amount due until paid, and reimbursement of reasonable attorneys' and experts' fees incurred by affected parties. In addition, to ensure fair treatment to landowners and businesses when offers of just compensation are made, condemned parties in other jurisdictions are reimbursed their attorneys' and experts' fees if the final offer price by the condemning agency is less than a certain percentage of the final judgment awarded by the court.

6. **Disclosure of Impacts.** The RAMP does provide for basic negotiation procedures where the agency is to “discuss its offer to purchase the property, including the basis for the offer of just compensation and explain its acquisition policies and procedures, including it[s] payment of incidental expenses in accordance with 49 CFR 24.106.” See, § 4.B of App. W of the RAMP. However, it does not expressly require the City to disclose to the property owner or business the impact of the Project on the remainder parcel, including the business thereon, or the date by which payment will be made. It is requested that the basic negotiation procedures specifically include the City’s disclosure of the impact of the Project on the remainder parcel, including construction disruptions, temporary and permanent access issues, noise, vibrations, etc., and compensation offered for such adverse impacts; and the date that compensation will be paid (in a pre-established schedule) and the consequences described above if payment is not made as scheduled.

7. **Subdivision.** Although the City is vested with the authority to approve the subdivision and consolidation of parcels of land, it does not usually exercise such authority when condemning property.¹³ As such, it is requested that the RAMP (in sections describing closings) provide that on a partial taking, the City create subdivided parcels, including obtaining an order of the Land Court by the filing of the required petition and map, such that the parcel conveyed to the City and the remainder parcel are two separately subdivided parcels. Further, the City should permit the consolidation of a nonconforming (substandard) parcel with any adjoining parcel owned by or subsequently acquired by the condemnee.

8. **Non-conforming parcels.** When KS and its tenants have been left with a non-conforming parcel after acquisition by a governmental authority, they have not been able to obtain necessary building and other permits for renovation and/or redevelopment because of the non-conformity. It is requested that the City consider measures to allow reasonable development of non-conforming parcels created by the Project.

VI. KELO CONCERNS

Comment #13: KS requests assurances that the City will not take private property to give to another private party, whether in the context of a TOD or otherwise.

KS believes that its properties, including its legacy lands, should not be taken through the government’s exercise of its eminent domain powers and transferred to a private party for any use. In Kelo v. City of New London, 545 U.S. 469, 125 S.Ct. 2655, 162 L.Ed. 2d 439 (2005), the U.S. Supreme Court narrowly held in a 5 to 4 decision that a city could exercise its eminent domain power by transferring property from one private party to another to promote economic development. However, the U.S. Supreme Court emphasized that nothing in its opinion precluded any state or county from imposing stricter restrictions on its eminent domain power. Many states have already imposed standards stricter than the federal standard by constitutional amendments and legislation.

Any use of the eminent domain power to take KS’ property for private development, even if it is in the context of a TOD (transit-oriented development) or TSD (transit-supportive development) would have adverse economic and social impacts on KS. It is requested that the City declare in the Final EIS that the City shall not use its power of eminent domain to take private property and subsequently transfer, by sale or otherwise, the use, ownership, or possession of the condemned property, or any portion thereof, to any person or entity for any economic development or redevelopment or any private use or development, including but not limited to industrial, residential, agricultural, commercial, hotel, resort, office, or retail use or development, whether to raise revenue or otherwise create value to help it meet financial needs for construction or operation of the Project.¹⁴

VII. TODS AS POTENTIAL MITIGANTS

Comment #14: TOD could be a positive mitigant to the impacts described herein; however, it is premature to rely upon the benefits until a TOD ordinance is adopted and developments are integrated into the Project through planning.

A. Importance of Planning. Studies of other projects indicate that proactive planning efforts to allow high density residential and commercial development near stations are the primary cause of land value appreciation. An example cited for this is the SkyTrain system in Vancouver, where the local governments instituted long term regional planning to create new town centers around elevated transit stations. One such center is the Metrotown, a former light industrial and suburban single family neighborhood, which is reported to be home to over 6 million square feet of commercial and thousands of high rise residential units. Another example cited is the Pleasant Hill BART station area where over 2 million square feet of commercial and 2,300 residential units have been built on a 75-acre site since the mid-1980's. In both cases, rail transit was reported as the key driver behind planning and development efforts.

In contrast, where there is a lack of governmental assistance or coordination, the result may be decades of under utilized properties before any revitalization occurs. Even SkyTrain, as described above, has generated some negative impacts. Many stations have a poor reputation as magnets for crime. Development around elevated stations in the City of Vancouver has been hindered by NIMBYism and poor planning. It is reported that one year after the completion of the Expo line, the Ombudsman of British Columbia released a report addressing some negative impacts of SkyTrain, including noise, a harsh presence, loss of privacy and a depreciated enjoyment of lifestyle, all leading to reduced property values. Although in certain higher-density areas, home prices may increase near a station¹⁵, multiple studies of rail projects show that property values decrease if located near a rail line or even a station.¹⁶ In certain cases, with good planning and governmental assistance, these adverse economic impacts could be partially mitigated. Examining other projects should provide a sound basis for the City to improve upon the experiences of other cities.

B. Integrate Land Use Planning With the Project.

1. Study of other rail systems. To aid the City in identifying best practices in spurring TOD/TSD along the Project route, it is suggested that the City retain an independent urban economist to study other elevated, fixed guideway systems to evaluate and disclose both beneficial and adverse economic impacts on land values, including success stories where governmental assistance prevented or reversed decline. Public comments and input are recommended before the study is finalized.

2. TOD Ordinance. Furthermore, it is essential that the City enact a TOD ordinance. The DEIS has a limited discussion of TODs, but the *Land Use Technical Report* does contain a detailed discussion of land planning and a future TOD ordinance. It was anticipated that the City would develop and adopt a TOD ordinance by 2008. See, DEIS at 4-166. We remain hopeful that a bill will be introduced to the City Council in 2009. A TOD ordinance is appropriate before construction of the Project so that landowners can evaluate whether the ordinance will be an effective mitigant of the various impacts of an elevated system discussed elsewhere in this letter. In developing a TOD ordinance, consideration of the following is recommended:

a. Elements of successful rail projects. A study of rails systems shows that they all resulted in some negative impacts on surrounding properties, at least during construction; however, various aspects of each are also considered models for future TOD. Their success appears to be dependent upon: (i) the commitment of municipalities to employment and density; (ii) healthy real estate

market conditions; (iii) the interface and integration of rail and real estate concessions with adjoining TOD; (iv) careful phasing; and (v) public-private collaboration and the development of successful partnerships, including the establishment of the appropriate risk and revenue sharing mechanisms.

b. **Evaluation of other transit projects in other states.** Portland is often cited for having a strong planning component. It adopted policies on transit and land use that strongly encouraged TOD and is considered a model for successful development. It is reported that more than \$6 billion in development has occurred along MAX lines since the decision to build in 1978. The positive land use impacts of Portland's transit system are due to both the impact of the transit system itself as well as aggressive state, regional, and local policy. Many financial subsidies were also provided to developers to build transit oriented development. While Portland remains, in the eyes of many planners, a strong example of successful transit oriented development, there are many critiques of the city and the impacts of MAX.

c. **Implement sound planning principles.** Studies show that sound planning includes (i) giving priority to development of a TOD ordinance to encourage development along the currently planned route and future transit stations; (ii) working with consultants and landowners to ensure appropriate zoning/land uses around stations; (iii) providing tools to ensure the district receives the intended development lift¹⁷; (iv) modifying subdivision and land use ordinances to allow non-conforming lots to be consolidated and re-subdivided and to allow issuance of renovation and redevelopment permits for non-conforming lots, both as discussed above; (v) integrating parking into TOD as described above; (vi) planning for and encouraging TODs because they do not automatically occur¹⁸; including possible real property tax breaks; (vii) developing a specific timetable for the adoption of a TOD ordinance; (viii) seeking and obtaining public input on a bill for a TOD ordinance¹⁹; (ix) ensuring that the permits to construct the TOD will be issued in a timely manner; and (x) to the extent the TOD ordinance is not adopted in a timely manner, ensuring that permits will be issued for pending developments and not delayed in anticipation of the TOD ordinance.

VIII. STUDY OF NORTH KING STREET ALIGNMENT

During the alternatives analysis phase of the NEPA/HEPA review process, the City considered two alternative alignments for the portion of the fixed guideway traversing through Kalihi and Iwilei, one aligned at North King Street and another at Dillingham Boulevard. The DEIS, however, only discusses the Dillingham Boulevard alignment. It appears that the North King Street alignment may not have been adequately studied before being eliminated as an alternative, and that there are advantages to a North King Street route that warrant it being re-examined.

Comment #15: Further study of the North King Street alignment is recommended

A further evaluation of the North King Street alignment may be warranted. In the initial stages of the environmental review process for the Project, North King Street was considered for the segment of the rail system traversing through Kalihi and Iwilei. The *Alternatives Screening Memo Honolulu High-Capacity Transit Corridor Project* dated October 24, 2006, and prepared by Parsons Brinckerhoff ("*Alternatives Screening Memo*") listed five alignment options for this segment including elevated guideway alignments for North King Street and Dillingham Boulevard. See *Alternatives Screening Memo* at 4-17. By the time the City issued the *Alternatives Analysis Detailed Definition of Alternatives ("Detailed Definition")* and *Alternatives Analysis Report ("Alternatives Analysis Report")* both dated November 1, 2006, the North King Street and Dillingham Boulevard alignments remained as alternatives for the segment, but the remaining alignments were eliminated. See *Detailed Definition* at 6-16; *Alternatives Analysis Report* at 2-7.

The *Alternatives Analysis Report* ultimately decided that the Dillingham Boulevard alignment was optimal, and that the alignment was selected for discussion in the DEIS. *See Alternatives Analysis Report* at 6-4. One reason cited was that the Dillingham alignment would require acquisition of fewer residential parcels than the North King Street alignment. The table shows two residential parcels along the North King Street alignment that would be acquired compared to one along the Dillingham alignment. *See id.* Table 4-1, at 4-2. Unfortunately, neither the residential parcels nor the number of units on the parcels for each alignment is identified in the 2006 *Alternatives Analysis Report* to permit an evaluation of the number of residents who would be displaced under either alignment. However, Appendix B of the DEIS shows that all or portions of three residential parcels (not one as noted in the *Alternatives Analysis Report*) along Dillingham Boulevard are slated for acquisition by the City and the *Neighborhoods and Communities Technical Report Honolulu High-Capacity Transit Corridor Project* (RTD 2008d) dated August 15, 2008, at 5-17 states that along Dillingham “[p]roperty acquisitions would result in 11 residential displacements.” Thus, further evaluation would seem to be warranted to determine impacts on residents along both alignments.

The *Alternatives Analysis* states that the North King Street alignment would serve more residents than the Dillingham alignment, but notes that it would serve fewer jobs. As a general matter, serving more residents could lead to an increased ridership of rail because the rail system would be closer to people’s homes. Further, the North King alignment is a particularly attractive alternative if the City chooses not to make the stations along the Dillingham alignment more accessible by building parking garages near the stations.

The *Alternatives Analysis Report* also stated that a greater number of potentially historic properties are located along the North King Street alignment. *See id.* at 4-1. The number of historic properties located along each alignment is not quantified, and the definition of “historic properties” is unclear; it might be that certain properties are “old” but do not have social, cultural, or historic value.

It should also be noted that the Dillingham alignment will require acquisition of three times more the commercial/office parcels (22 parcels) than the North King Street alignment (6 parcels). *See id.* Building a rail line will exacerbate already difficult economic conditions for Dillingham businesses.

The *Alternatives Analysis Report* states that the Dillingham alignment would result in fewer noise impacts. *See id.* at 6-4. The basis for the conclusion is not available in the report yet should be for such an important consideration.

Finally, the State recently announced its plans for a “flyover,” an elevated two-lane roadway over Nimitz Highway, which “would run from the Ke’ehi interchange to Pacific Street, zipping commuters through Kaihi with no way to get off until its end.” Mary Vorsino, “Hawaii Set for Years of Roadwork in ‘Huge’ \$4B Highway Plan – 6-year effort includes Nimitz ‘flyover,’ better bike access,” *Honolulu Advertiser*, Feb. 4, 2009. The impacts of the two proposed elevated structures over the parallel traffic corridors of Nimitz Highway and Dillingham Boulevard should be considered in evaluating a North King alignment.

One of the primary reasons given for choosing the Dillingham alignment is that it is projected to experience the highest transit ridership, which includes ridership on various modes of transportation (e.g., busses). *See id.* at 3-6, 6-4. However, according to data reported in the DEIS, the North King alignment is forecasted to make 128,500 daily trips on the *fixed guideway system* as opposed to 123,700 daily trips for the Dillingham alignment. *See id.* Thus, for purposes of comparing two fixed guideway alignments, the North King Street alignment actually would attract more use. Moreover, the North King Street alignment is forecasted to experience twice the number of daily boardings than the Dillingham

alignment—i.e., 10,860 daily boardings for the three stations along the North King alignment²⁰ versus 5,370 daily boardings for the two stations along the Dillingham alignment.²¹

For these reasons, KS requests that the Final EIS include the North King Street alignment as an alternative.

IX. EVALUATION OF AN AT-GRADE OR MULTI-MODAL SYSTEM IN THE URBAN CORE

Comment #16: An at-grade or multi-modal transit system in the urban core is an alternative worth evaluating to determine whether it is a less expensive and quicker to construct than an elevated system.

KS is supportive of a fixed guideway transit system.²² The fixed guideway alternatives discussed in the DEIS utilize an elevated rail system and vary only in terms of alignment. See DEIS at S-4. None of the alternatives discussed in the DEIS appears to utilize at-grade technology for any segment of the alignment. While it is understandable why an elevated system might be utilized in rural areas of the transportation corridor, as discussed elsewhere in this comment letter, a host of adverse economic and environmental impacts are associated with an elevated guideway system, including noise, reduced visibility and access to businesses, visual blight, and increased crime. Such impacts will be greatest in the urban core where businesses and commercial land holdings are concentrated, including those of KS. For these reasons, it makes sense to consider an alternative to an elevated system at least within the urban core. KS believes that an at-grade system running from the perimeter of the urban core is a viable alternative to an elevated system based on cost, visibility impacts, urban aesthetics, construction impacts, and time to construct.

It is KS' understanding that the City did not formally reject an at-grade system as an alternative during the alternatives analysis.²³ Because the issue of whether the rail system should run on an elevated line instead of at-grade was never squarely raised during the alternatives analysis process, KS did not previously have the opportunity to comment on the relative merits of an at-grade versus elevated system.

It does not appear that the at-grade alternatives were adequately studied before being eliminated from consideration in the DEIS. Although at-grade alternatives were considered during the alternatives screening process, the reasons why they were not carried through to the DEIS is not explained. In fact, the *Alternatives Screening Memo* left open the option of constructing certain portions of a fixed guideway system at-grade. See, e.g., Screening Memo at 4-1, 4-4. For example, at-grade options were contemplated for the portion of the route from Leeward Community College to Aloha Stadium and from Aloha Stadium to Ke'ehi Interchange (Section 4). See *id.* at 4-10 to 4-17. The *Detailed Definition* did not discuss whether the fixed guideway system would be elevated, at-grade, or below-grade.

The *Alternatives Analysis Report* is largely silent on whether the fixed guideway alternative would be at-grade or grade-separated (or a combination). The "optimum alternative" identified in the *Alternatives Analysis Report*, which apparently became the alternative endorsed in the DEIS, was compared to other alternatives differing in terms of method (e.g., managed lane alternative, TSM alternative) and route, not above-grade versus at-grade. The only reference to an elevated fixed guideway in Chapter 6 is a statement that the Twenty-Mile Alignment "continues elevated following Nimitz Highway to Ala Moana Center." *Id.* at 6-5. Based on this chronology, it is KS' understanding that the discussion of what fixed guideway system is optimal for the urban core remains open. This is an opportune time to continue the discussions.

A ground-level transit system for the urban core is worth considering because it can meet performance demands, and it has been demonstrated to work in other cities. Los Angeles' Blue Line is an

example of a rail system that utilizes a combination of at-grade, elevated, and subterranean technology. In the urban core of Long Beach, however, the Blue Line is completely at-grade. Our research indicates that the system carries 56,000 passengers per day with 20 peak hour trains running during both morning and afternoon commutes and 10 off-peak trains.

Portland's Tri-Met system is an example of a mixed-grade system. The Portland Metropolitan Area Express ("*MAX*") Light Rail system is at-grade through downtown and runs on elevated lines to the suburbs. Other types of trains also service the downtown area.

A similar at-grade system would be a viable option for the urban core of Honolulu. KS' understanding is that the desired through-put of the Project in mixed traffic is 3-minute headways and 6,000 passengers per hour per direction ("*pphpd*"). Experts have noted that a light rail transit ("*LRT*") system running on surface streets could satisfy the criteria. Three-minute headways equate to 20 train movements per hour; thus, a capacity of 6,000 pphpd requires that each train carry 300 passengers per hour. Modern light rail vehicles ("*LRV*") have a capacity in the range of 232 passengers per car. When operated in two-car trains, LRVs can exceed the throughput requirement.

Examples of at-grade LRT systems that can achieve the specified through-put include the following:

Alberta, Canada. Calgary, Alberta's system provides more than 6,000 pphpd capacity on Seventh Avenue, a surface street having numerous cross streets controlled by traffic lights. Its current schedules show that Calgary Transit operates its C-Train Route 201 (Dalhousie/Bridlewell-Somerset) every 4 minutes during the weekday morning and afternoon peak periods; the C-Train Route 202 (McKnight-Westwinds/City Centre) runs along Seventh Avenue every 6 minutes during the weekday morning and afternoon peak periods. This results in a combined headway of 2 minutes, 24 seconds. With the delivery during 2007 and 2008 of 40 additional LRVs, both of the light rail lines are being operated with three trains of Siemens-built U-2 and S160 LRVs, each with a practical capacity of 162 passengers, resulting in a practical capacity along Seventh Avenue of 12,150 pphpd based on 75 LRV car movements per hour.

Portland, Oregon. Portland, Oregon's MAX is a three-line LRT that operates through its central business district in curbside lanes along Morrison and Yamhill Streets. The three LRT lines currently operate a combined 4-minute headway (15 trains per hour in each direction) through Pioneer Square, the center of Portland's central business district, during the weekday morning and afternoon peak hours. A fourth LRT line, which will run for 1.8 miles through the central business district along Fifth and Sixth Avenues and on a 6.5 miles-long branch to Clackamas Town Center is nearing completion and is scheduled to be placed into passenger-carrying service on September 10, 2009.

Denver, Colorado. Denver's Regional Transit District operates 15 LRT trains (4-minute average headways) with lengths varying between two and four cars on its D, F, and H lines along California and Stout Streets. The West Line, a third LRT now under construction, will add two additional services throughout downtown Denver.

The above examples show that an at-grade transit system for the Honolulu urban core is an option worth serious study and consideration.

Endnotes:

- ¹ KS is a landowner in Honolulu, and the proposed rail alignment traverses through four key communities in which KS has a combined land area of approximately 229 acres. In each community, the proposed rail line either bisects KS' land holdings or runs along the perimeter of its properties.
- ² See **Comment # 3** for a more specific discussion on parking impacts.
- ³ This request is made pursuant to 40 C.F.R. §§ 1508.8 and 1508.14. "When an environmental impact statement is prepared and economic or social and natural or physical environmental effects are interrelated, then the environmental impact statement will discuss all of these effects on the human environment." 40 C.F.R. § 1508.14. The *Economics Technical Report Honolulu High-Capacity Transit Corridor Project* (RTD 2008c) issued by DTS on August 15, 2008 was also reviewed in formulating this comment.
- ⁴ Mitigation measures for post-construction impacts are discussed in other sections of this letter.
- ⁵ Note that the *Transportation Technical Report* was also reviewed in formulating this comment.
- ⁶ Publication No. FHWA HI-88-054.
- ⁷ Boulevard Saimin is identified as a historic property in the DEIS. See DEIS at Table 5-2, page 5-7.
- ⁸ The DEIS provides, "Acquisition of property for the Build Alternative would be conducted in accordance with Federal and State regulations and procedures outline in the Real Estate Acquisition Management Plan (RTD 2008q). Where relocations would occur, affected property owners, businesses, or residents would receive compensation in compliance with all applicable Federal and State laws. Compensation would be in accordance with the Federal Uniform Relocation Assistance and Real Property Acquisitions Policies Act (CFR 1989)." DEIS at S-6.
- ⁹ By way of example, although there are references to increasing the width of Dillingham Boulevard by ten feet, it is unclear whether each right-of-way taking along Dillingham Boulevard will be ten feet wide.
- ¹⁰ The maps included in Appendix B of the DEIS indicate that the rights of way acquisitions "may be in the form of an aerial easement; an easement allowing joint use; subdivision of property with transfer of title; transfer of title for the entire parcel; or some other form to be documented by Land Court registration."
- ¹¹ By way of example, it would make sense to treat the parcels constituting Dillingham Shopping Plaza as a single parcel because they are owned and operated as an integrated economic unit.
- ¹² Defined consequences would also ensure that the City understands that the federal requirements are not merely guidelines (notwithstanding the label of "policies" or "plan"), but are enforceable obligations to be taken seriously with consequences for failure to comply.
- ¹³ For example, if the City condemns a strip of land in the middle of a parcel, the City's condemnation could create two nonconforming (substandard) parcels. The City has not allowed the consolidation of the nonconforming parcels with adjoining parcels owned by the same party. Such nonconforming (substandard) parcels adversely impact the property owner's ability to develop, sell, or lease such parcels.
- ¹⁴ If the City does intend to use its power to take private property for private development, including any TOD or TSD, it is requested that the Final EIS (a) describe in detail any such intended use of the City's eminent domain power, (b) evaluate and disclose the economic and social impacts of such action, and (c) propose mitigation measures.
- ¹⁵ The DEIS contains Table 4-35, at 4-169, entitled "Rail System Benefits on Real Estate Values." This summary appears to be incomplete and could be misunderstood as showing how the Project will increase "home" values if the home is located closer to the rail line.

¹⁶ By way of example, a 1996 study of properties within a half mile of Portland's MAX stations had higher values but those within a half mile of the rail line, but not near a station, decreased in value. A 2004 study even showed that home values near the Chicago Midway Line station decreased in value after the rail project was completed.

¹⁷ A study has shown that adjacency to transit stations is not a sufficient factor to cause development to occur. It found dozens of stations areas where no new development had occurred for 20 to 30 years. It is reported that along LA's Metro Blue Line, there has been little or no development activity along a several mile stretch of Long Beach Boulevard. Real estate professionals indicated that "the location of the transit line in the middle of the street had a significant negative impact on accessibility to retail businesses along the street.

¹⁸ Development along the rail line will not likely occur automatically; governmental assistance and coordination are needed. It is reported that Portland TODs are heavily subsidized in the form of tax breaks, infrastructure subsidies, below-market land sales, and direct grants. The City of Portland has used tax incentives (\$100 million of 10-year waivers of property taxes offered to high-density residences along the light-rail line) to help overcome redevelopment hurdles. This is excluding the \$1.2 billion in tax-increment financing that Portland is offering to developers along the rail lines or similar direct subsidies offered by Portland's suburbs, including Gresham and Beaverton.

¹⁹ It is important that KS, prospective investors, lenders, and affected businesses be given an opportunity to provide input on the bills. It should be noted that, the *Land Use Technical Report* provides that Kapalama has a "low potential for TOD," Table 5-1, at 5-4. KS requests further discussions with the City on the potential for TOD in Kapalama.

²⁰ This is the sum of the forecasted 3,530 boardings at the North King & Owen Street station; 2,580 boardings at the North King Street & Waiakamilo Road station; and 4,750 boardings at the North King Street at Liliha Street station. See *Alternatives Analysis Report* at Table 3-9, page 3-19.

²¹ This is the sum of the forecasted 3,030 boardings at the Dillingham Boulevard & Mokauea Street station and 2,340 boardings at the Dillingham Boulevard & Kokea Street station. See *Alternatives Analysis Report* at Table 3-9, page 3-19.

²² The term "fixed guideway" means:

(4) Fixed guideway.--The term "fixed guideway" means a public transportation facility—

(A) using and occupying a separate right-of-way or rail for the exclusive use of public transportation and other high occupancy vehicles; or

(B) using a fixed catenary system and a right-of-way usable by other forms of transportation.

49 U.S.C. § 5302(a)(4). This definition does not distinguish between elevated and at-grade systems. Furthermore, according to the *Alternatives Analysis Report* at 5-5, the FTA Section 5309 New Starts program provides funds for the construction of a "new fixed guideway" system, which "refers to any transit facility that uses exclusive or controlled rights-of-way or rails, entirely or in part. Eligible purposes for these funds include light rail line, rapid rail (heavy rail), commuter rail, automated fixed guideway system (such as a 'people mover'), a busway/HOV facility, or an extension of any of these." Id.

²³ If the City did make a formal determination that an at-grade system is inferior to an elevated system and thus rejected an at-grade system as a viable alternative, information on that determination should be provided.

TERM	DEFINITION
Alternatives Analysis Report	<i>Alternatives Analysis Report</i> dated November 1, 2006
Alternatives Screening Memo	<i>Alternatives Screening Memo Honolulu High-Capacity Transit Corridor Project</i> dated October 24, 2006, prepared by Parsons Brinckerhoff
BDMP	Business Disruption Mitigation Plan
CBRE	CBRE Consulting, Inc.
City	City and County of Honolulu
DEIS	<i>Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement/Section 4(f) Evaluation</i> dated November 2008
Detailed Definition	<i>Alternatives Analysis Detailed Definition of Alternatives Honolulu High-Capacity Transit Corridor Project</i> dated November 1, 2006, prepared by Parsons Brinckerhoff
DTS	Department of Transportation Services of the City and County of Honolulu
EIS	Environmental Impact Statement
FHWA	Federal Highway Administration
Final EIS	The Final EIS for the Honolulu High-Capacity Transit Corridor Project
FTA	Federal Transit Administration
HEPA	Hawai'i Environmental Policy Act, Hawai'i Revised Statutes, Chapter 343
KS	Kamehameha Schools
Land Use Technical Report	<i>Land Use Technical Report Honolulu High-Capacity Transit Corridor Project (RTD 2008b)</i> dated August 15, 2008
LRT	Light rail transit
LRV	Light rail vehicle
MAX	Metropolitan Area Express
MOT Plan	Maintenance of Traffic Plan
NEPA	National Environmental Policy Act, 42 U.S.C. § 4321 <i>et seq.</i>
Pphpd	Passengers per hour per day
Project	Honolulu High-Capacity Transit Corridor Project
RAMP	<i>Real Estate Acquisition Management Plan (RAMP) Honolulu High-Capacity Transit Corridor Project (RTD 2008q)</i> dated February 29, 2008 and revised on April 1, 2008
RTD	Rapid Transit Division of the Department of Transportation Services of the City and County of Honolulu
TMP	Transit Mitigation Plan
TOD	Transit-oriented development
Transportation Technical Report	<i>Transportation Technical Report Honolulu High-Capacity Transit Corridor Project (RTD 2008a)</i> dated August 15, 2008
TSD	Transit-supportive development
UltraSystems	UltraSystems Environmental
Visual and Aesthetics Resources Technical Report	<i>Visual and Aesthetics Resources Technical Report Honolulu High-Capacity Transit Corridor Project (2008e)</i> dated August 15, 2008

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February 5, 2009

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Mr. Wayne Y. Yoshioka, Director
Department of Transportation Services (DTS)
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawai'i 96813

Reference: THE DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS), City of Honolulu's Heavy Rail Transit Project

Aloha, Director Yoshioka,

Thank you for allowing me the opportunity to present my opinions and comments on the heavy, massive rail transit project, perhaps the largest capital public works project the City and County of Honolulu will ever undertake at the expense of the taxpaying public, of which I strongly *oppose!*

My name is Glenn Oamilda, born and raised in Waipahu on the O'ahu sugar plantation, now residing in nearby 'Ewa Beach, where for the last twenty-five (25) years I have remained active and continue to be involved in community organizations and activities, political, social and cultural, with greater concerns over development issues and problems that have directly impacted my community and the greater 'Ewa region.

Today, many who reside in the region are angry and frustrated with the everyday hassles of meandering through the myriad of traffic and development problems, issues and impacts, just to get to work and back. Some people remain very cynical that positive changes will come soon; while other feel that more on-going and continuous planning is really needed to insure a well maintained, sustainable and balanced growth throughout the region.

I cannot forget the very first meeting ever held, nearly fifteen (15) years ago, when people in the region came together to talk-story and plan that brought forth a vision for a second city. After the closing of both 'Ewa and Waipahu sugar plantations, people watched and witnessed as sugar lands were slowly being transformed and developed into a city. Although, along with the many positive changes, came all the negative changes as well.

The Second City of Kapolei: The 'Ewa Development Plan vs. Mass Rail Transit

After many years without much government oversight, the public living in the region have come know how to deal and faced the daily complexities that development brings. They have agreed, instead of groping effortlessly in the dark to find solutions and remedies, the 'Ewa Development Plan a planning guide and a public/government document is the alternative that offers a more realistic and pragmatic approach that addresses and deals with all the present mounting impacts and future and predictable issues, and problems related to development and traffic. They understand the EDP serves with much government and public leadership and oversight that outlines the policies, with and guidance, controls and enforcements over development.

There is no doubt in 2005, when the incoming mayor made a serious pitch for mass transit, it became a top priority on his political agenda. And he aggressively challenged anyone who dare to oppose, or even question his motive on how to solve the leeward traffic congestion problems. After his first term in office, the mayor had shown no desire, no interest in the 'Ewa Development Plan. It was only evident by his unwillingness to engage in a concerted effort to partner with people in the region to find solutions and answers to all the present and future development impacts, issues and problems.

Today mind you, the city have shown no interests or hints of wanting to come together in partnership to seriously discuss present and future plans for the second city. I think the city purposely and intentionally side-stepped the public's EDP review process on all the new proposals and on-going projects. This passive inaction and insensitive display only heightened and further increased public tensions with deepening negative feelings. With on-going daily psychological pressures, financial and physical stresses, residents living in the region cannot continue to remain positive and hopeful their vision and goal will ever come to fruition in the planning and the building of the second city. So why then is government dragging its feet on initiating a meeting, a task force or a conference?

And yet, the mayor and the city response to 'Ewa's woes is a-go-at-it-alone mindset, by proposing an elevated mass transit system. I think this proposed project is simply an illusion. At the initial meeting on the Plan, nearly fifteen years ago, rail was never on the agenda, never an agenda item at subsequent meetings, or a topic of conversation by any committee member, nor even a subject of interest at any public community meetings. In the EDP, only an intra-modal transportation system circulating within the second city of Kapolei is mentioned, with no provision for an elevated mass transit. So, I ask: Why hasn't the mayor expressed any real interest or responded with great concern by partnering with residents on the west side to

find answers and solutions to the regional problems? Or is this train project a political game of follow the money, a quid pro quo, "something-for-something" arrangement with private developers, or corporate affiliates to further his political ambitions?

Planning: Less Cost to Taxpayers

My answer to them, based on my own personal experience and years of observation is to repeat the same concerns the general public has about development and that, its simply utilizing the EDP already in place as the main planning tool.

In my opinion, the Plan will eventually lessen the \$6 billion dollars estimated projected cost for rail, leading government to consider other cheaper alternatives, by: 1) Aggressively promoting or persuading business employers to relocate to 'Ewa, or by offering tax incentive and tax credits as inducements; 2) Urging business employers to bring with them workers back to the area, that would greatly reduce the traffic congestion by the amount of car from 'Ewa going to town every morning and returning home every evening; and, 3) Lessening the stresses on the environment, the precious resources and retaining the natural beauty of the island.

However, for the last two and a half years, I attended nearly fifteen (15) City and County of Honolulu sponsored public forums where Parsons/Brinkerhoff, the city's lead contracted planners, made each presentation on the mass transit project, and yet, there was nothing compelling or convincing enough that would sway me to think otherwise that, this proposal would be a benefit to the all communities and the taxpayers as well, that: 1) The city can justify, by its own estimates, the high cost of building the rail of between \$3.5 and \$6 billion dollars (including property condemnation), and the annual perpetual maintenance cost of \$60 million dollars; 2) It will reduce traffic congestion, on the amount of cars traveling east bound every morning and the reverse west bound in the afternoon; and, 3) This massive and heavy elevated rail system is, in many way, environmentally green and earth friendly.

I cannot fully accept the city's decision or motive or its data, nor even feel comfortable and optimistic that rail is the answer and it will work. This is clearly a unilateral, a one-sided approach, based on statistical findings predicated only on assumptions, inferences and suppositions, with no hard guarantees, assurances or other viable transportation alternatives, but to the city rail is the only solution. But the city feels hopeful and confident this proposed heavy and massive rail project will literally get working people out of their automobile, hop on the train in the morning to Honolulu and back to 'Ewa in the afternoon. Frankly, I said before and I am going to repeat it again, this proposed mass transit is one man's illusion to think that rail will get people out of cars.

Let me give an example, in the year 2000, the state with federal dollars initiated the ferry pilot project which ran from 'Ewa Beach to Aloha Tower it offered perks and freebees as inducements to get drivers from the west side out of their cars. But after a year, because of the low public ridership, the ferry project went 'belly up.' Its plain and simple, drivers in Hawai'i are simply captivated by their big gas guzzling sedans and heavy SUV trucks. They don't mind traveling far distances, and won't even blink an eye at the cost of higher gas prices, even car and bus pooling, stretching the freeways, rearranging workers schedules have not worked at all. The city should have learned from this picture by connecting all the dots. By the estimated huge price tag for the proposed massive elevated rail which the city is asking taxpayers to shoulder is simply foolish and irresponsible. Its just throwing hard earned working dollars at a very bad project. In my opinion, rail is just another choice, another alternative offered to the general public, and the likelihood people will choose the automobiles. What would I suggest? Let me start by addressing automobiles going into downtown Honolulu from 'Ewa, that the city considers passing and enforcing an ordinance that would restrict private automobile movement from entering this 'no drive zones,' a mile radius from the civic center. The other idea is to enact a law that controls that sets a ceiling on the amount of automobiles on the island.

The City and County of Honolulu justifies its argument and swears by its presumptive assertion, supported by a Traffic Alternative Analysis study citing data that, by the year 2030 build out, the public will see an eleven percent (11%) to about twenty-three (23%) reduction in traffic that, a rail transit system is needed now, as the only option and the only answer to solving the daily vehicular work traffic congestion problems. I think these are sorry and dismal numbers that taxpayers can be pleased with, and can be convinced their dollars are being spent wisely, money not just thrown against the wall hoping something sticks. If the city stand by these figures, then perhaps, all the decisions-makers and politicians should reside in the 'Ewa area so they can sympathize and empathize with the pain and anguish the residents the go through every morning. People who have lived in the region for years have come to know, come to understand and agree that the most sensible and rational way to deal with the morning and evening traffic congestion problem is to begin the planning process.

Vision is to Plan Now: Don't Wait Until 2030 Build-out

Mr. Yoshioka, lets be real, this is 2009, between now and the next twenty-one (21) years when the city estimates by 2030 the second city of Kapolei will be built-out, what hopeful suggestions can the city make to the people and to the commuting public? Mind you, if there are no suggestions from you or the mayor, then residents and commuters alike can continue crossing their fingers, hoping for the best, and chug-a-long in daily traffic as they normally did, and ignoring on-going

development by just pretending as if nothing is going on. I think waiting twenty-one (21) years by this administration for the second city massive built-out is just a cheap and easy-way-out than to deal with the public's every day problems in the region. It only points out how inept and incompetent government really is. Historically as far back as the early '80s, every community on the 'Ewa plains and along the Wai'anae coast foresaw a massive influx of people with a shift in island population along with huge developments. Indicators and predictors proved to be correct, now we all share the same common development impacts, issues and problems.

When Kapolei was designated the second city by the state of Hawai'i, there were no concerted efforts or suggestions made by past city administrations, or even this one, to all the players in the region to come together in partnership and engage in the planning process with serious and continuous ongoing dialogues, discussions and discourses.

The 'Ewa Beach community, for example, which relies primarily on the Fort Weaver Road corridor, the only main arterial roadway in and out of the area, requested and pressed the city and county for an alternate road, one that was parallel and within the federal limited guidelines, in and out of 'Ewa Beach. But

after years and years of political "foot dragging," and with mauka housing developments moving rapidly makai into 'Ewa Beach, the community unfortunately lost out and is now tucked away, cornered in on the leeward side of O'ahu, locked in makai by the ocean and mauka by land.

Lack of Planning: Communities Question Government's Role

Today, Mr. Yoshioka, as the Honolulu City Council debates the alternate transit alignment from 'Ewa thru the community of Salt Lake by-passing the Honolulu airport to town, as one option; or by-passing Salt Lake thru Honolulu to town as the other option, what alternative can you offer the community of 'Ewa Beach having no more than one-roadway-in and one-roadway-out, yet unlike the Salt Lake community having multiple accessible roadways in and out of the area? However, at the present time, to say the least, discussions continue between the city council and the Salt Lake community representative councilman Romy Cachola. Whatever the outcome, its just an awesome display of caring and concern by an elected public official in representing his constituents. In contrast, I can say with great certainty, that 'Ewa Beach for many years, never had good, solid and decisive elected representation; and in fact, I think the area councilman, Todd Apo, has already hopped on the train with the mayor.

Furthermore, I can also attest that on the initial rail proposal, the city and area elected officials never met with members of the 'Ewa Beach community; nor was the

public given the opportunity to openly discuss and dialogue the elevated rail transit, the alignment, or the choices of alternate rail technologies. Regrettably, as of today, the community is still without an alternate route out of the area, 'Ewa Beach commuters must continue to deal unbearably with twelve (12) traffic lights, daily road work and home construction; for residents who waste time sitting in traffic and drivers who must drive daily, the five (5) miles distance just to get to H-1, doing the math calculation is a no brainer its *total insanity!*

In the late '80s, when the State of Hawai'i designated Kapolei as the Second City, it only meant that the downtown Honolulu business district and its surrounding populated areas were showing signs of bursting at the seams, of being over crowded.

The political and social strategies was to relocate business employers to the second city bringing workers along by offering them businesses tax incentives and tax credits; and at the same time, attracting housing developers who would design and build well-planned communities. Newly relocated workers would move in these planned communities, commuting workers would return to the region to work and together they all can live, work and play in the area, thereby spending more time strengthening family relationships, community ties and enhancing the *life-style* values from Hawai'i's unique cultures and traditions.

When the housing developers arrived, in the mid-to late '90s, they were noticeable by the staggering numbers of permit requests for land zoning, rezoning, waivers, amendments and agreements. The high numbers of permit approvals for housing developments, easily out paced government's ability, not only to provide guidance and leadership toward a *balanced* and *sustainable* growth, but also lacked the power to control and mitigate the predictable mounting impacts caused by the uncontrollable and rampant developments on the 'Ewa plains. Moreover, with development came more housing construction, but businesses never kept pace with development and the growing working population, and as a result, many area workers had to travel back and forth to town. With the lack of oversight and aggressive control over housing construction and traffic congestion, some people have grown more leery, angry, apathetic and the lost of trust and confidence in government and elected politicians; while others have deepening resentment that the city had simply yielded its authority and acceded power to the developers.

Residents also, strongly believe that construction of only houses creates bedroom communities. It minimizes the *qualities-of-life* and diminishes *life-styles*; hearing developers talk of making huge profits, meeting deadlines, rushing to build-out and building more homes because of buyer-markets, have been seen by the general public as being too greedy! These sorts of thinking and behavior has only lessened the chances and prospects of ever obtaining a well *balanced* and *sustainable* growth

in the region. In addition, the city's Department of Planning and Permitting (DPP) has projected that there will be about forty thousand (40,000) new homes built on the 'Ewa plains. This estimate does not include those houses already permit approved, shovel ready and on-going housing projects. This projected data points out that without proper and serious planning, one can only visualize that by the 2030 build-out the second city of Kapolei will look like a massive, sprawling bedroom metropolis.

Moreover, public protest and anguish over too much cars!, too much traffic lights!, too much housing construction!, no alternate roads out!, no infrastructure!, of over building, of over development, of traffic impacts, of the lost of a life-style and the quality-of-life continues until this very day. It has intensified to a point that for many residents living in 'Ewa has become so unbearable *mentally, physically and financially!*

In addition, public dissent and dissatisfaction has manifested itself in other area of the island as well. Community leaders and residents living in the Central O'ahu area from Waipio Gentry, Mililani, Wahiawa, and others communities mauka, are skeptical that short term traffic solutions can be found. They have made it also clear at many community gatherings and meetings, that increased traffic congestion from the west side will make it even tougher for them to get to town every morning and back home every evening.

The Honolulu city council, in late 1997, adopted the 'Ewa Development Plan. Through a *visioning team* consisting of community members and leaders from local boards, activities, organizations and in partnership with the city's planning department came together to address all future developments on the 'Ewa plains.

After months and years of public discourses, dialogues and discussions, the team set in place a regional plan, a public/government document, consistent with a vision, concepts and policies, principles and goals with realistic guidelines for a *balanced and sustainable growth*.

Clearly, the EDP underscores two (2) important points: 1) In provision 5.1.2 that says "the city must take an active role in the planning and coordinating construction of needed infrastructure And the development of the regional transportation system", and, 2) In provision 2.2.10 "as a condition for zoning approval to insure that development does not outpace infrastructure development "

The 'Ewa Development Plan: Review, Reassess and Revise

The 'Ewa Development Plan, however, is ten (10) years late and over due for

public review. It missed the first and second five (5) year review cycles. As of November, 2008, after ten years of added proposed and on-going projects in the region, the public will finally get to review, reassess and make the necessary changes to the draft EDP proposal.

Yea but, the questions I have lingering in my mind are: What will happen to all those construction projects from the last ten (10) years that have been included and approved by the Department of Planning and Permitting (DPP) that have already been built, in the paper mill or shovel ready? Furthermore, does the public get to decide what projects stay and what projects go? And is the city willing to partner with the players the region in reviewing and assessing the draft EDP? And as a follow-up, is the city willing to engage the public in continuous discussions, dialogues and discourses on solutions to the present traffic and development issues, problems and impacts? And is the city willing to be involved in present, on-going and continuous future planning?

Everyone should be reminder that the 'Ewa Development Plan came to life as the result of government partnering with the public. To repeat again, the EDP is a government / public document that outlines the principles, policies and goals and serves as a planning guide to on-going and future developments in the region that would help mitigate most, if not all, of the present and future impacts and issues.

I remembered very clearly, when the city presented to the public for the first time its conceptual layout of the mass transit project at Kapolei Hale. On fielding questions from the audience, I asked the mayor a question of which I thought was very simple and very direct: Mr. mayor with the high cost of the proposed rail transit couldn't the money be redirected and wisely spent in the 'Ewa region for the purposes of mitigating some of the impacts, like building new and repairing roads, repairing and upgrading sewer plant and transmission lines throughout the entire 'Ewa region?

He retorted with sarcasm, saying, "Glenn, your thinking is in the minority!" He quickly turned to all his department heads, city aides and workers who were standing in front of the glossy colored layouts sitting on top about a dozen and a half easels depicting the mass rail transit route alignment, and asked them: "Does anyone agree with Glenn?" He got an instant response. In unison, they all clapped and with a big roar said, "No!" At that point I knew that this transit project was a 'done deal,' leaving no doubt in my mind that this project was going to be his *baby* his *legacy!*

Mr. Yoshioka, by those responses nearly three years ago, the mayor was adamant and unmoved that the proposed rail transit project, which would move people daily

to Honolulu to work and home, costing taxpayers billions of dollars, is the only solution to 'Ewa's problems. People don't think the mayor fully understands the severity of just how the daily issues and problems related development have greatly impacted their lives. They can relate stories and experiences on how they have coped daily with all the financial and psychological stresses and traumas brought about by all the impacts.

They sense the city is narrowly focused on rail only and nothing else. They have seen no signs or a willingness to partner in a parallel planning process that addresses the issues and impacts now, and not wait until 2030. It blows my mind just to think that the city and county with all the available resources at its disposal cannot approach or engage the communities in problem solving. Yet today, the city continues to move forth with plans for the massive rail project, leaving area commuters and residents with an apathetic and insecure feeling that the city is incapable of "chewing gum and walking at the same time."

Finally, let me leave with these suggestions: 1) That the city in partnership with all the players in 'Ewa region engage in a parallel planning process - continue to plan the rail project, and in tandem; continue to address and find solutions to the traffic congestion and infrastructure problems; 2) That we enforce the provisions of the 'Ewa Development Plan by maintaining a presence in the 'Ewa region exerting strong leadership and guidance and control coordination over development activities; 3) That we utilize the EDP as the guide to a sustainable and balanced growth; 4) Entertain plans for Kapolei to become a "real" city with a government structure in place; 5) That we recreate financial strategies to attract and draw more business employers to the region, i.e., offers of tax incentives, tax credits, etc.; and, 6) Take more social and sensitive approaches to Hawai'i's 'life-style' - the inherent cultural and traditional values - with a clear-cut mandate to insure and preserve the *quality-of-life* for every citizen.

The Environment Vs. Rail: Concrete in the Sky

In Hawai'i the environment is really dear to everyone who live here. Residents respect and revere nature in every form. Visitors alike appreciate the natural scenic views and pristine beauty of the island. This proposed rail system will destroy the view and beauty of the 'Ewa area. The city's own Alternative Analysis study indicates there will be cement columns and piers, rising like towers in the sky, built and constructed to support concrete platform bays. There will be nineteen (19) of them each with a maximum heights of eighty (80) feet (comparable to a six or seven story building), and a minimum of thirty (30) feet (similar to a two story building), running twenty-three miles, starting at the eastern end of the 'Ewa plains and terminating at the University of Hawai'i in east Honolulu. The reference and description made by many people that, this proposed heavy, elevated and massive

rail transit as being just “concrete in the sky.” I concur with them as a true assessment of the project, the city is insensitive and out of touch with the rest of the O’ahu’s population. I’d like to remind the city, make no exceptions, we are all stewards of the environment - from the mountain to the sea - over, under and above the land and over, under and above the ocean. The mayor thinks his rail project is ‘environmentally friendly,’ but I beg to differ with him. Government should be in the forefront, leading the public on mitigating environment issues, but this city administration chooses to trade-off hawai’i’s fragile environment for an elevated rail system. Is it humanly possible to simply throw hard earned taxpayers’ money at this proposed rail transit and ignore the cognizant consequences to the environment?

Noise pollution is another issue that the proposed heavy rail regarding will have on the environment. The city’s Traffic Alternative Analysis study indicates that high pitched screeching sound emitted from the train’s metal-on-metal, steel wheels, running on steel rails would be no louder than the noise of a car’s rubber on concrete or asphalt traveling at the maximum freeway speed. This assumption remains to be validated, but all is known that noise is definitely pollution.

Lastly, the city is throwing everything it has in its arsenal in hopes this proposed massive, elevated rail transit system will be successful despite the low state and federal revenue projections. To me its a bad proposition to just throw hard earned tax dollars at a bad project, with hopes of getting the greatest bang out of taxpayers money. The present economic down turn, which is reflected not only on the national level, also felt here in Hawai’i is completely irresponsible and heartless for the Hannemann administration to ask the taxpayers to fund this project. The cost to all O’ahu taxpayers to fund, condemn property (displace people) and maintain, in perpetuity, the heavy and massive rail system is a big request for taxpayers to shoulder, plus the tremendous environmental, psychological and economic accompanying risks. Mahalo ’io ’oe!

With sensible and rational planning,

Glenn Okamoto





General Growth Properties, Inc.

February 5, 2009

Via Certified Mail - Return Receipt Requested and Commercial Delivery Service

Department of Transportation Services
City and County of Honolulu
650 South King Street, Third Floor
Honolulu, Hawai'i 96813

Re: Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement

Ladies and Gentlemen:

Thank you for the opportunity to submit comments on the above Draft Environmental Impact Statement ("EIS"). These comments are being submitted to you by General Growth Properties, Inc., on behalf of its affiliates with an ownership interest in property proposed to be included in or affected by the Honolulu High-Capacity Transit Corridor Project. These properties include Ala Moana Center, Ala Moana Plaza, Ala Moana Building, Ala Moana Pacific Center and the Ward properties.

First, we would appreciate copies of the following documents and reserve the right to submit further comments based upon these materials:

- The Real Estate Acquisition Management Plan described on page S-6 of the Executive Summary of the EIS; and
- More detailed plans relating to the proposed Kaka'ako (Ward) and Ala Moana Stations.

We have the following comments with respect to the plans labeled as follows:

- Appendix A - Conceptual Alignment Plans and Profiles, Plan and Profile, Sta 1340+00 to Sta 1370+00 (Sheet 25 of 32)
- Appendix A - Conceptual Alignment Plans and Profiles, Plan and Profile, Sta 1370+00 to Sta 1401+26 (Sheet 26 of 32)
- Appendix B - Conceptual Right-of-Way Plans, Right-of Way Plan & Property Tabulation, Sta 1338+00 to Sta 1362+00 (Sheet 45 of 59)

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AR00057963

- Appendix B -- Conceptual Right-of-Way Plans, Right-of-Way Plan & Property Tabulation, Sta 1362+00 to Sta 1386+00 (Sheet 46 of 59)
- Appendix B -- Conceptual Right-of-Way Plans, Right-of-Way Plan & Property Tabulation, Sta 1386+00 to Sta 1401+26 (Sheet 47 of 59)

Based upon our review of the above plans, we believe that there will be significant impacts to our properties. These include, but are not limited to:

- the loss of a material number of parking stalls, which would affect the parking requirements in the real estate agreements with a number of tenants and could result in lease terminations and/or significant expenditures to replace this parking, if it can be replaced;
- complete or partial loss of the use of several buildings and parking structures, with the attendant loss in gross leasable area and net operating income;
- the loss of several driveways leading to Queen Street;
- the loss of the mechanical room that services the building that houses Ross Dress for Less, The Sports Authority, Marukai 99 Cent Store and Pictures Plus; and
- impacts to the future development potential of our properties.

In addition, it appears that a vertical circulation system may be needed through several levels of the Ala Moana Center parking deck for access to the transit line. Please confirm if this is the case. If so, there may be additional costs to GGP for security, custodial, maintenance and other expenses associated with the operation of the Ala Moana station.

It also appears that columns required to support the transit line are proposed to be built through a number of buildings on our Ward properties, at Ala Moana Center and the recently built expansion area, the Ala Moana Center parking deck, and the Ala Moana Building parking deck.

As a general observation, as previously discussed with the City, our traffic consultants have proposed other alternative routes in the area that would better serve the totality of Kaka'ako and reduce the economic impact to our properties, as well as reduce the number of businesses affected. We would be pleased to share these plans with you and discuss them at your convenience.

The EIS indicates that plans are conceptual and subject to change. Accordingly, our comments are also of a general nature and subject to amendment as the plans are finalized. In addition, we would appreciate the opportunity to work with you with respect to the methods of construction, the construction timeline, staging areas, utility relocation and related matters so that the impact upon our properties and the business conducted thereon is minimized to the greatest extent possible.

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We also have the following specific comments.

- Table 4-20 on page 4-114 of Chapter 04 of the EIS indicates that there is an unidentified above ground storage tank (AST) at 404 Ward Avenue (TMK no. 21050062), which is slated for full acquisition. Please note that the tank is a grease receptor for the restaurant, which is regularly emptied and maintained. Therefore, this site should not be considered a hazardous materials site. Please amend this table in the EIS accordingly.
- Table 4-31 on page 4-145 of Chapter 04 of the EIS titled "Potential Long-term Adverse Effects on Cultural Resources Related to Act 50" indicates that practices at Tio's (which is now Kanpai Bar and Grill) and California Rock-N-Sushi restaurants will be displaced. Please explain the type of practices that you anticipate will be displaced.
- Table 4-32 on page 4-149 of Chapter 04 of the EIS and Table 5-2 on page 5-8 of Chapter 05 of the EIS indicate that the Ala Moana Building (TMK no. 23039001) is a historic building. All references to this historic designation should be deleted unless you can provide verification that this designation has been properly granted.
- Sheet 45 of 59 of Exhibit B lists the TMK for 534 Ko'ula Street as 2-1-52:16. Our records indicate that the correct number is 2-1-53:16.
- Sheet 46 of 59 of Exhibit B lists the TMK for 335, 345 Kamake'e Street as 2-3-5:23. Our records indicate that the correct number is 2-3-005:13.
- Sheet 46 of 59 of Exhibit B lists the uses for 1020, 1030, 1044 and 1060 Kamake'e Street as commercial. There is a mix of commercial and industrial uses.

Please note that the tenants and other occupants of our properties may have comments as well and we do not purport to speak on their behalf.

Finally, the purpose of this letter is to comment upon the EIS in general terms. We have not attempted to outline all of the effects that the proposed project will or may have upon our properties, both current and future uses, such as those envisioned in the recently approved Master Plan for the Ward properties. We also note that the EIS does not adequately detail the measures, if any, proposed to minimize adverse impacts of the project on the properties and businesses affected. We reserve all of our rights and remedies, at law and in equity, in connection with the project and its effect upon our properties and the businesses conducted therein.

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the Honolulu High-Capacity Transit Corridor Project. We look forward to meeting with you to discuss our comments in greater detail.

Sincerely,



Jan S. Yokota
Vice President – Development, Hawai'i Region

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February 6, 2009

Mr. Ted Matley
U. S. Department of Transportation
Federal Transit Administration – Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

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

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

Dear Messrs. Matley and Yoshioka:

UltraSystems Environmental (UltraSystems) was retained by Kamehameha Schools (KS) to conduct an independent review of the subject DEIS and companion technical reports, and to prepare the following findings and comments. (KS is preparing its own comments and sending them in a separate letter.) UltraSystems is one of the leading environmental planning and consulting firms in the western United States, and has extensive experience in preparing technical studies and environmental documents. Its services include environmental analyses, air and noise impact studies, transportation, biology and wetlands, Phase I and II environmental site assessments, hazardous materials management, and land use studies.

UltraSystems has a distinguished track record in preparing high-quality environmental documents for residential, commercial, industrial, institutional, transit, transportation, and infrastructure-related projects for public and private sector clients throughout California and the western United States. Each of our six principals brings more than 30 years of experience in the preparation and peer review of environmental documents.

Besides reviewing the DEIS, UltraSystems reviewed the guidance provided by the Federal Transit Administration on preparing project Environmental Impact Statements;¹ the *Honolulu High-Capacity Transit Corridor Project Alternatives Analysis Report, City and County of Honolulu*; Hawaii Revised Statutes, Chapter 343 (Environmental Impact Statements), Hawaii Revised Statutes, Chapter 344 (State Environmental Policy); and the *City and County of Honolulu Land Use Ordinance* to gain a better understanding of the planning process being followed on the proposed Project and the local land use rules and regulations that will come into play on lands impacted by the Project.

¹ "National Environmental Policy Act." Federal Transit Administration – Planning & Environmental (www.fta.dot.gov/printer_friendly/planning_environment_225.html).

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The following comments summarize Project-related issues and questions that UltraSystems identified during its investigations. For your ease in consideration of the comments, they are organized into nine topics. The presentation of each topic includes a general comment, followed by specific concerns.

A. Transportation

The Honolulu High-Capacity Transit Corridor project may create significant construction and operational traffic, roadway and parking impacts on adjacent KS-owned land that have not been adequately quantified and the proposed mitigation measures lack specificity or evidence that they will effectively reduce impacts to property owners and businesses.

Concern #A-1: Planned Parking Appears to be Insufficient and May Result in “Spillover” to Adjacent Commercial Properties

- The proposed Pearl Highlands Station would have a 1,600-space park-and-ride facility (DEIS, Page 2-27). Should additional parking be needed in the future, will sufficient space be available to expand the park-and-ride lot? If insufficient parking is provided, those driving to this station will be forced to seek parking elsewhere.
- Dedicated kiss-and-ride pullouts (passenger drop off) or parking spaces are planned at many stations to facilitate drop-off and pick-up (DEIS, Page 2-36). No additional parking is shown for the Kapalama Station (DEIS, Page 2-31, Figure 2-31). Given that there appear to be no residences within the standard quarter-mile walking radius, it is reasonable to assume that riders will drive to this station—and need parking—or that few riders are expected at this station because it may be easier to simply drive into town from there. Please confirm if this station is intended to have fewer than average riders. If it is expected to have average per-station ridership, then please explain how parking demand will be handled if the City plans on drawing many riders from this area. If off-street parking is planned for this station, then please provide the parking report for public review. If off-street parking is not planned for this station, then please provide a report explaining the reasons for the expected low ridership at this station—and which stations are expected to carry the heavier rider loads. When showing the heavier rider loads please include in the report the number of riders expected there and the number of parking spaces required. Also, if people do end up riding from this station and parking, please provide a written plan showing how they will be accommodated so as to not have a negative impact on commercial tenants near this station.
- Twenty-six off-street parking spaces would be lost on Dillingham Boulevard between McNeill Street and Waiakamilo Road due to fixed guideway column placement in the median (Transportation Technical Report, Table 5-54, page 5-114). Commercial properties a few blocks west of the proposed Kapalama transit station will be affected.
- Ten off-street parking spaces would be lost on Dillingham Boulevard between Waiakamilo Road and Kohou Street due to fixed guideway column placement on the side (Transportation Technical Report, Table 5-54, page 5-114). The loss of off-street parking could impact customer and employee parking at Waiakamilo Shopping Center and buildings on both sides of Dillingham. (KS-owned land is on both sides of this section - McNeill to Kohou). What impact would the loss of these off-street parking spaces have on the commercial uses along Dillingham Boulevard?
- For the Kaka’ako station, 16 on-street Mauka and 22 on-street Makai parking spaces would be lost on Halekauwila Street between Keawe Street and Coral Street due to fixed guideway column placement on the side (Transportation Technical Report, Table 5-54, page 5-114; see also DEIS Page 2-32, Figure 2-35). Please describe the impact from the loss of these on-street parking spaces on businesses located on KS-

owned properties and where those spaces could be replaced? This site is likely to be an a.m. net destination station more likely to have less parking demand than a net ride generating station.

- The *Transportation Technical Report* states that park-and-ride usage would be free (Section 5.6.2, page 5-86). It is a common experience throughout California that parking at transit stations is underestimated, and consequently, additional parking is often required after the initial construction, to meet the increased demand. This was certainly the case at UltraSystems' home base of Irvine, California, where a three-story parking garage was recently built for the Irvine Amtrak/Metrolink station, after the capacity of the original surface parking lot was exceeded. Based on this premise, land for more parking would likely have to be acquired. The Final Environmental Impact Statement (FEIS) for the Project should address the question of how the construction and maintenance costs for these additional facilities would be paid for. The FEIS' cash flow and budget should address this.
- The following additional mitigation measures for parking impacts should be included in the FEIS:
 - ✓ The foundations of parking garages for transit and bus patron parking shall be designed and constructed so that additional floors could be added as needed in the future.
 - ✓ Where parking structures are not planned to be built, enough land shall be acquired by the City and County of Honolulu so that surface lots can be expanded as necessary to handle future increases in parking requirements. It will be less costly to reserve the land now, rather than when the demand becomes acute.

Concern #A-2: Elimination or Narrowing of Existing Traffic Lanes May Result in Safety Problems

- In some cases, widening the existing street median to accommodate the columns for the fixed guideway would require reducing lane widths slightly. Table 3-21 (Column Placement Effects on Streets and Highways – page 3-39 of the DEIS) shows where columns would be placed and the new widths of traffic lanes on certain street segments. However, with only one exception, the table does not report the widths of the traffic lanes under the No Build Alternative.² Therefore, the extent of change in lane widths is not known. Although the transportation technical report reports historical accident rates, it and the DEIS are silent on the issue of impacts of lane width changes on road safety. **UltraSystems requests that a fully documented analysis of the effect (if any) of lane width reduction on traffic accident rates be included in the FEIS.**
- The FEIS should address the issue that the narrower lanes are likely to affect the operation of larger vehicles such as semi trucks and buses and create safety hazards. Operating large vehicles in 10 foot wide lanes may create an unreasonable risk of automobile accidents in these lanes and of risk to people and business near these rights-of-way.
- Along three street segments (Dillingham from McNeill to Waiakamilo, Halekauwila from Keawe to Coral, and Halekauwila from Punchbowl to South Street), sidewalks will be narrowed by one to five feet (DEIS, Table 5-57). Narrowed sidewalks can reduce bicycle and pedestrian safety, as sidewalk users would be moved closer to automobile traffic.

² Information on existing lane widths is also lacking in the transportation technical report.

Concern #A-3: The impacts on traffic near the park-and-ride facility at the Pearl Highlands Station may not be sufficiently mitigated by the measures proposed in the DEIS.

Table 3-22 (Effects on Traffic near Park-and-Ride Lots – 2030 No Build and Build Alternatives) shows that the level of service (LOS) will remain at F for two intersections near the Pearl Highlands Station under the No Build and Build Alternatives. At a third intersection (Farrington Highway and Waiawa Street), the p.m. peak hour LOS will decline from D under the No Build Alternative to F under the Build Alternatives. Except for one instance (p.m. peak hour at Kamehameha Highway and Kuala Street), delays at all the intersection will be greater under the Build Alternative than under the No Build Alternative. According to the DEIS, potential mitigation measures include widening existing roads, signalizing intersections, and “other treatments.” This raises some questions that need answering in the FEIS:

- What is the approximate amount of mitigation (in seconds of delay, for example) that would be expected from road widening and signalizing intersections?
- The term “other treatments” is too vague; what are some of them, and how effective would they be?
- Could the incorporation of feeder buses in the project design provide additional mitigation?

B. Safety and Security

Construction and operation of the transit project will create significant safety and security problems at the proposed Pearlridge Center, Kapalama and Kaka’ako transit stations to be constructed near or adjacent to KS-owned lands. **It is not clear from the DEIS how these problems would be addressed. Project safety features should be reviewed to determine whether they are adequate to ensure the safety of transit passengers at these stations.**

C. Land Use

Construction and operation of the transit project will impact a number of KS-owned lands near or adjacent to the Pearlridge Center and Kapalama stations and along Dillingham Boulevard, particularly in the Dillingham Plaza Area. The reduction in the size of KS owned parcels in these areas may result in the creation of existing, non-conforming uses that may hinder future redevelopment of these lands.

Concern #C-1: The loss of ten feet of land in front of commercial properties along Dillingham Boulevard, particularly in the area of Dillingham Plaza, will make land uses non-conforming and hinder future redevelopment.

- The loss of 10 feet of land in front of KS commercial-use properties will result in the loss of most of the landscaped area in front of these businesses and a number of existing mature street trees that are required by the City and County of Honolulu Land Use Ordinance.³ Existing sidewalks in these areas will also be removed, with the sidewalks being moved back to the new edge of Dillingham Boulevard. This will result in a sidewalk/landscape area adjacent to the remaining businesses on these lands. It is assumed at this time that the loss of required lot size and landscaping will make all of these lots non-conforming, and subject to the constraints prescribed by Section 21-4.110 (Nonconformities) of the Ordinance. This may make the redevelopment of the commercial land uses on KS properties more difficult if these uses have to be brought up to the current City’s current Land Use Ordinance at the time that they are developed. The FEIS should address this question and resolve it by more than providing perpetual variances, since this is also a matter of lost business opportunities caused by the impact of the Project.

³ See Sections 21-3.110-1 (Business uses and development standards), 21-3.120-2 (Business mixed use district uses and development standards), and 21-4.70 (Landscaping and screening).

- Loss of land along Dillingham Boulevard may also impact the landscaping for off-street parking, the size of parking spaces and the loading areas for the commercial uses along this street. These changes may make these lots non-conforming due to the lack of adequate landscaping for parking and loading areas.⁴ Again, future redevelopment of the commercial use along Dillingham Boulevard may be impacted, with these lots and uses considered. This is a particular concern for the Boulevard Saimin Restaurant (1425 Dillingham Boulevard), which has only twelve parking spaces, two of which potentially will be lost due to the widening of Dillingham Boulevard.

Concern #C-2: The DEIS' focus on the impacts of full acquisition of properties (i.e., change in land use, need for relocation) fails to acknowledge the impacts of partial acquisitions.

The DEIS notes (page 4-20) that “Based on the relatively small number of parcels affected by full acquisition, the effects on different types of land uses in the study corridor would be minimal. No mitigation measures would be needed.” As documented in the *Land Use Technical Report* (Pages 4-9 through 4-15), KS expressed its concern that the proposed Project’s land acquisitions, including multiple partial acquisitions, may limit KS’ ability to maximize the development potential of its properties.

Concern #C-3: The DEIS fails to consider sufficiently the impacts of the Project on documented future developments.

- The *Land Use Technical Report's* discussion of transit station land use impacts (pages 5-2 to 5-11) acknowledges that KS owns many properties near the proposed Kalihi, Kapalama, Kaka’ako, and Mo’ili’ili stations and has major redevelopment plans when current leases expire. **The potential impacts of the proposed transit project on these documented plans for redevelopment are not analyzed in either the Technical Report or the DEIS. This is a serious deficiency, which should be corrected in the FEIS.**
- Table A-17 of the *Land Use Technical Report*, which summarizes land use issues associated with the proposed Kalihi transit station, states that the City would “coordinate with Kamehameha Schools regarding redevelopment plans.” The City should address these issues with KS prior to completion of the FEIS. Until such coordination is concluded, the City cannot claim that it has mitigated specific land use issues at least with respect to communities where KS owns substantial acreage at or near the proposed rail line.
- Table A-18 of the *Land Use Technical Report*, which summarizes land use issues associated with the proposed Kapalama station, acknowledges that “Kamehameha Schools owns much property west of” Honolulu Community College (HCC), and that “redevelopment possibilities exist a few blocks east and west.” Section 3 of Table A-18, under *Refinements to Plans to Improve TOD*, states that “Coordination with Honolulu Community College (HCC) will be necessary to create strong pedestrian connection to College buildings to enhance ridership.” **To not include coordination with Kamehameha Schools is a serious deficiency. KS owns over 105 acres of land in Kapalama and has ownership of land on either side of Dillingham from Waikamilo Road to Kohou.**
- Table A-28 of the *Land Use Technical Report*, which summarizes land use issues associated with the proposed Mo’ili’ili station, acknowledges that KS is concerned that the height of the station will be at the 6th story of its planned building. The table also states that the City needs to coordinate with KS so the station and KS’ plans “are compatible, particularly regarding pedestrian facilities.” **Therefore, it is requested that the following mitigation measure be included in the FEIS:**

⁴ See City and County of Honolulu Land Use Ordinance, Sections 21-6.10 through 21-6.140.

The City and County of Honolulu shall coordinate with KS on the latter's plans to redevelop its lands near the Mo'ili'iili station in regards to the station's pedestrian facilities. Construction of this station shall not begin until this coordination has been completed and the appropriate pedestrian facilities have been included in the station's design.

D. Visual/Aesthetics/Street Trees

Construction of the transit project will create visual impacts on a number of KS-owned lands. It will also result in the removal of a number of significant street trees and other ornamental vegetation on KS lands, which will diminish the value of KS property and create significant aesthetic impacts due to changes in perception of KS property, loss of shade, screening from adjacent land uses, etc. Operation of the transit project will also create visual impacts on a number of KS tenants who will have views of the transit way and transit support columns.

Concern #D-1: The Visual and Aesthetic Resources Technical Report does not contain sufficient detail on the evaluation of impacts by "viewer groups."

The *Visual and Aesthetics Resources Technical Report* utilized the methodology of the Federal Highway Administration's (FHWA's) *Visual Impact Assessment for Highway Projects*,⁵ for the proposed project since it is a linear transportation facility comparable to a highway, has a similar range of issues, and because the FTA has not issued comparable guidance. The FHWA guidelines (Page 7) state:

"The major components of this process include establishing the visual environment of the project, assessing the visual resources of the project area, and identifying viewer response to those resources. These components define the existing conditions. We can then assess the resource change that would be introduced by the project and the associated viewer response; these allow us to determine the degree of visual impact."

The *Visual and Aesthetics Resources Technical Report* (Page 3-2), discusses how viewer groups have been categorized (i.e. residents, commuter, etc.) and indicates that viewer response to change is impacted by viewer exposure and viewer sensitivity. However, the analysis provided in Section 5.0 (Consequences) of the technical report contains few to no details regarding user group exposure to project alternatives for different user groups, including such factors as location, duration, and distance. **Please provide additional clarification regarding viewer exposure and viewer sensitivity for the selected view points.**

Concern #D-2: Numerous KS properties located adjacent to, or near the proposed fixed guideway system and stations would have their views impacted.

The Build Alternatives would have an elevated guideway and elevated stations throughout the study corridor. The support columns would range from 3 to 8 feet in diameter. All stations would have similar design elements, platforms that would be between 270 and 300 feet long, and a minimum of 10 feet wide. The Station height would be about 20 feet taller than the guideway. "As a result, the stations would be dominant visual elements in their settings and would noticeably change views. Systems elements for all technologies being considered would introduce new visual elements that may contrast with the existing environment's scale and character" (DEIS, Pages 4-93, 6-1 and 6-2).

- The *Visual and Aesthetics Resources Technical Report* (Page 6-1) recommends that, as a mitigation measure, project design should "incorporate elements of the Design Language Pattern Book being developed by the Project Team." KS would like to be consulted during development of the pattern book to help ensure that new stations and landscaping are compatible with existing land uses adjacent to the transit project. **Therefore, it is requested that the following mitigation measure be included in the FEIS:**

⁵ Publication No. FHWA HI-88-054.

The City and County of Honolulu shall consult with KS in the development of the pattern book that will be used in designing stations and landscaping.

Page 6-1 of the *Visual and Aesthetics Resources Technical Report* notes that impacts associated with the Build Alternative could include:

- Removal or relocation of Exceptional Trees;
- Changes in the settings of historic or cultural sites or Section 4(f) resources;
- Alteration of mauka-makai views;
- Introduction of project components that are out of scale or character with their setting;
- Moderate to high viewer response to project changes;
- Introduction of new light sources in sensitive areas; and
- Inconsistency with policy documents.

Views of the Pearlridge and Kapalama stations from KS properties are of particular concern. Tenants of KS-owned lands near or adjacent to these stations will see stations looming over them. In addition, the stations may create shading problems on adjacent lands.

Concern #D-3: The mitigation measures for visual effects lack specifics.

FHWA's visual impact assessment guidelines state, "To be relevant, visual mitigation measures must address the specific visual impacts or problems caused by project alternatives." The currently proposed mitigation in the DEIS (Page 4-93) is very general and lacks specifics as to how the mitigation measures would reduce or minimize specific visual impacts. The discussion of mitigation fails to provide a nexus as to how mitigation would address the specific visual impacts from the proposed project. In addition, the mitigation identified in the Draft EIS does not indicate any measures to mitigate construction-related visual impacts. However, the *Visual and Aesthetics Resources Technical Report* does provide greater detail regarding principles to minimize, reduce, or mitigate impacts, including those related to construction. The FEIS should include no less than the following measures:

- The City and County of Honolulu shall integrate transit-oriented development policies and principles with station designs, in consultation with developers and City, County, and State agencies before any station designs are completed;
- The City and County of Honolulu shall, in the FEIS, include a copy of the Design Language Pattern Book being developed by the Project Team and incorporate the applicable elements of the Design Language Pattern Book into the design of transit stations and landscaping;
- The City and County of Honolulu shall ensure that the final project design is aesthetically appropriate—as well as being functional;
- The City and County of Honolulu shall consult with the communities surrounding each station for input on station design elements and shall reach an agreement with all stakeholders before finalizing the station design;
- The City and County of Honolulu shall create a project design that is appropriate in scale and character to its setting;
- The City and County of Honolulu shall incorporate project design components that help create a human-scale and pedestrian-friendly environment;
- The City and County of Honolulu shall use project design features with materials and shapes that fit the topography and visual setting;
- The City and County of Honolulu shall look for opportunities to use materials that minimize the potential for vandalism;

- The City and County of Honolulu shall look for opportunities to use materials that reflect the Hawaiian culture;
- The City and County of Honolulu shall retain or replace existing street trees along sidewalks and in medians, and plant new vegetation to help soften the visual appearance of project elements (e.g., stations, guideway columns, and TPSSs);
- The City and County of Honolulu shall use source shielding in exterior lighting at stations and ancillary facilities such as the maintenance and storage facility and park-and-ride lots, to ensure that light sources (such as bulbs) would not be directly visible from residences, streets, and highways, and to limit spillover light and glare in residential areas;
- The City and County of Honolulu shall work with relevant adjacent land owners and developers to integrate project elements with area redevelopment plans as appropriate, particularly at stations; and
- Construction-related mitigation shall include the following:
 - Removing visibly obtrusive erosion-control devices (e.g., silt fences, plastic ground cover, and straw bales) as soon as an area has been stabilized;
 - Replacing street trees and other vegetation that must be removed with appropriately sized vegetation;
 - Keeping roadways as clean as possible by using street sweepers and wheel washers to minimize off-site tracking;
 - During dry periods, applying water to exposed soils to minimize airborne sediment;
 - Properly maintaining construction equipment to minimize unnecessary exhaust; and
 - Locating stockpile areas in less visibly-sensitive areas and, wherever possible, placing them in areas that are not visible from the road, or by residents and businesses.

The FEIS should provide site-specific mitigation measures for non-high-rise areas due to relatively higher visual impacts in order to adequately mitigate such impacts. This is particularly important for the Pearlridge and Kapalama stations, which would be developed near or adjacent to KS-owned lands.

Concern #D-4: The mitigation measures for removal of street trees are vague and inadequate.

The DEIS indicates that numerous street trees that would be pruned, removed, or transplanted as a result of any of the Build Alternatives. Of particular concern is the number of street trees that would be removed, including the 28 “notable” true kamani trees along Dillingham Boulevard, and how their removal would be mitigated. The mitigation provided on page 4-138 of the DEIS is vague and lacks specifics on this matter. Should street tree work such as pruning, removal or transplanting, not be done correctly, trees may become disfigured or die, creating a significant aesthetic impact on the project area, along with a need for corrective measures and their attendant costs.

- According to the DEIS, effects on street trees would be mitigated by transplanting existing trees or planting new ones. While relocating a street tree would retain the tree, the relocation of that tree would change its original environment. Therefore, more specific mitigation for areas to which existing trees would be relocated or removed is needed to ensure that these locations are appropriately mitigated. **Specifically, areas adjacent to and/or near KS properties requiring tree relocation or removal should be adequately mitigated.**
- What would happen in cases where the transplanted tree dies, as not all the proposed tree relocations may be successful? The mitigation on page 4-138 of the DEIS does not prescribe any post-transplant monitoring of relocated trees, nor does it provide any provisions for relocated trees that do not survive the transplant process.
- The DEIS contains little information on how mitigation would be determined in cases where tree removal would be required. As indicated on page 4-138 of the DEIS, “To mitigate any substantial effects in the areas that require removal, special attention would be given to developing landscape plans so that new

plantings would provide similar advantages to the community. If new plantings would not offer equitable mitigation (e.g., older mature trees that are removed), additional younger trees could be planted that would, in time, develop similar benefits.” Would younger trees be planted at a 1:1 ratio but older more mature trees at a higher ratio? Based on the information provided in the Draft EIS, it is unclear as to what criteria would be used to determine adequate quantities of new plantings to mitigate tree removal. The mitigation measures also do not indicate any monitoring of new plantings, or identify provisions should any of the new plantings die.

E. Noise and Vibration

The noise and vibration impact analysis in the DEIS and associated technical report is not adequately documented and does not address potentially important impacts upon commercial properties.

Concern #E-1: The noise analysis is not adequately documented.

Neither the DEIS nor the supporting technical report discusses the method by which noise levels due to the Project were calculated. It is likely that methods prescribed in FTA’s *Transit Noise and Vibration Impact Assessment* manual⁶ were used. Furthermore, the assumptions used to estimate noise attenuation due to the parapet wall and the wheel skirts for receptors higher than the guideway are not reported. **The noise analysis in the FEIS needs to be fully documented and the assumptions and calculations need to be provided in an appendix, so that they may be checked.**

Concern #E-2: The noise analysis does not address potential impacts upon commercial land uses.

The DEIS uses the aforementioned FTA guidance’s noise impact criteria as the standard against which to evaluate noise exposures due to the Project. The FTA criteria apply only for exposures to three categories of “sensitive” receptors. Category 1 includes land uses where quiet is essential, such as outdoor amphitheatres and recording studios. Category 2 includes residences and other places where people sleep. Category 3 is for “institutional land uses with primarily daytime and evening use,” including schools, libraries, theaters, churches, historical sites, and parks. None of these category definitions includes, explicitly or implicitly, commercial operations. Furthermore, Hawaii State and local plans and regulations do not have standards for exposure of commercial receptors to transit noise. For this reason, the DEIS analysis did not consider impacts to commercial receptors. However, noise impacts to commercial receptors may be important in certain cases. This fact is recognized, for example, by the State of California in its *General Plan Guidelines*,⁷ which include ranges of acceptable exposures for “office buildings, business commercial and professional” land uses. **It is requested that the FEIS consider the issue of noise impacts upon commercial land uses.**

Concern #E-3: The discussion of mitigation measures for noise impacts to sensitive receptors higher than the guideway is inadequate.

The noise analysis conducted for the DEIS found that “moderate” impacts (as defined by the Federal Transit Administration) would occur at several sensitive receptor locations, including some residences that are at higher elevations than the guideway (DEIS, Table 4-16). The DEIS does not specify any mitigation measures. Instead it says that “measures to reduce noise levels above the track elevation ... would be evaluated during preliminary engineering of the Project. Once the Project is operating, noise levels will be measured to determine the actual extent of project noise impacts.” (DEIS, pp. 4-101 and 4-107) The nearly complete deferral of the description of mitigation measures to the project engineering design stage is not acceptable under NEPA. Although it is true that Project design information is needed to determine the best mitigation measure for each predicted impact, it is

⁶ U. S. Department of Transportation. 2006. Federal Transit Administration. *Transit Noise and Vibration Impact Assessment*. FTA-VA-90-1003-06. May.

⁷ State of California, *General Plan Guidelines*. Governor’s Office of Planning and Research, Sacramento, California (2003).

possible now to present at least a list of mitigation options that can reduce exposures to 45 or 50 dBA Ldn or below. A list of mitigation options should be included in the FEIS.

F. Construction Impacts

Construction of the transit project will create a number of impacts on KS lands along the transit corridor including interruption and/or temporary loss of access to businesses, potential temporary loss of utilities to businesses, temporary and/or permanent loss of on and off-street parking at KS businesses.

Concern #F-1: The DEIS does not adequately address left-turn closures on Farrington Highway in Waipahu during construction.

The DEIS (Page 4-153) states that left-turn lanes on Farrington Highway in Waipahu would be closed during construction. There are KS owned properties at the intersection of Farrington Highway and Waipahu Depot Road. The DEIS does not discuss the impact of the lane closures on traffic levels of the surrounding roads. It is believed that motorists will avoid the lane closure by using other alternate routes. The FEIS should include an analysis of the impacts on local businesses and KS tenants created by the closure of left-turn lanes on Farrington Highway in the Waipahu area, including the impacts of by-pass traffic. Mitigation, if necessary, should also be included in this analysis and included in the FEIS.

Concern #F-2: Proposed measures for maintaining auto access to residences and businesses during all phases of construction need to be made more specific. Additional measures are needed.

The ten mitigation measures to reduce adverse economic hardships for existing businesses along the project alignment during construction activities that are listed on page 4-154 of the DEIS should be included in the Maintenance of Traffic (MOT) Plan that would be developed by the Project construction contractor prior to construction of the Project. **However, as currently written in the DEIS, these measures are very vague and do not clearly indicate who will be responsible for implementing them. These measures should be revised to be no less than the following—and be included in the project FEIS:**

- The City and County of Honolulu, in concert with the project construction contractors, shall ensure by any necessary means that access to businesses in the project area shall be maintained during project construction activities.
- The City and County of Honolulu shall develop a public involvement plan prior to the beginning of project construction to inform business owners of the project construction schedule and activities throughout the project construction phase.
- The City and County of Honolulu shall initiate public information campaigns to reassure people that businesses are open during project construction activities to encourage their continued patronage throughout the project construction phase.
- The City and County of Honolulu shall minimize the extent and number of businesses, jobs, and access affected during project construction, by any means deemed feasible, throughout the project construction phase.
- The City and County of Honolulu, to the extent practicable, shall coordinate the timing of temporary facility closures to minimize impacts to business activities in the project area – especially those related to seasonal or high sales periods.
- The City and County of Honolulu shall minimize, as practical, the duration of modified or lost access to businesses in the project area, throughout the project construction phase.
- The City and County of Honolulu shall provide signage, lighting, or other information to indicate that businesses in the project area are open throughout the project construction phase.

- The City and County of Honolulu shall provide public information (e.g., press releases or newsletters) regarding construction activities and ongoing business activities, including advertisements in print and on television and radio on the Island of O’ahu during the project construction period.
- The City and County of Honolulu shall coordinate with the project construction contractors the phasing of construction in each project construction area so as to maintain access to individual businesses for pedestrians, bicyclists, passenger vehicles, and trucks during business hours and important business seasons, throughout the project construction phase.
- The City and County of Honolulu, in concert with the project contractor, shall provide advance notice if utilities would be disrupted, during regular business hours and schedule major utility shut-offs during non-business hours.

The following additional mitigation measures to reduce this Project’s impact on business access should be included in the Project FEIS.

- Prior to and during construction of the East Kapolei-Ala Moana Center Segment, the FTA and the City and County of Honolulu, Transportation Services, Rapid Transit Division (RTD) shall contact and interview individual businesses potentially affected by construction activities, and maintain appropriate records. Interviews with commercial establishments will provide FTA and RTD staff knowledge and understanding of how these businesses carry out their work, and will identify business usage, delivery, and shipping patterns and critical times of the day and year for business activities. Data gathered from these interviews will also assist the FTA and RTD as it works with the City & County of Honolulu Department of Facility Maintenance to develop the Worksite Traffic Control plans. Among other elements, these plans will identify alternate access routes to maintain critical business activities.
- The FTA and RTD shall establish a “Public Affairs Program” that will be responsible for implementing the following actions:
 - ✓ Convey construction information to the community in a timely manner so as to minimize the potential disruption to businesses.
 - ✓ Develop a process that will enable the community to “speak” to the FTA and RTD during construction that includes a specific mechanism for responding to community concerns in a timely manner.
 - ✓ All FTA and RTD responses to community concerns shall be coordinated with the construction team.
- The FTA and RTD shall work with community residents, elected officials, local businesses, and community organizations to tailor the mitigation program to meet community needs in an East Kapolei-Ala Moana Center Segment Business Disruption Mitigation Plan (BDMP) prepared by FTA and RTD staff prior to the commencement of construction activities. A copy of the East Kapolei-Ala Moana Center Segment BDMP shall be placed in the East Kapolei-Ala Moana Center Project Information Field Office for public viewing. FTA and RTD shall inform the public of its progress in implementing the measures identified through a quarterly program of auditing, monitoring, and reporting. A quarterly status report shall be made available to the public. FTA and RTD shall appoint a staff person to work directly with the public to resolve construction-related problems.

The following mitigation measures should be minimum elements of the East Kapolei-Ala Moana Center BDMP:

1. It may be necessary to temporarily relocate immediately affected owners and occupants of businesses or provide a rent subsidy if, for example, access to the business could not be maintained or the business could not be operated in a normal manner. These options shall be explored by FTA and RTD staff if the need arises.

2. During construction of the project, FTA and RTD staff shall establish a project information field office located along the East Kapolei-Ala Moana Center Segment. The field office, in conjunction with other FTA and RTD staff, will serve multiple purposes, including:
 - ✓ Respond to and address community and business needs during the construction period,
 - ✓ Respond to complaints lodged by the public and construction claims,
 - ✓ Allow FTA and RTD to participate in local events in an effort to promote public awareness of the project,
 - ✓ Manage construction-related matters pertaining to the public,
 - ✓ Notify property owners, residences, and businesses of major construction activities,
 - ✓ Provide literature to the public and press,
 - ✓ Promote and provide presentations on the project via FTA and RTD's Speaker Bureau,
 - ✓ Respond to phone inquiries,
 - ✓ Coordinate business outreach programs,
 - ✓ Schedule promotional displays, and
 - ✓ Participate in community committees.
3. The project information offices shall be open various days of the work week for the duration of the construction period. A schedule shall be developed before project construction begins, shall be included in the East Kapolei-Ala Moana Center Segment Business Disruption Plan and shall be reported in the quarterly Mitigation Measures Status Report provided to the FTA.
4. An information and voice mail telephone line shall be available to provide community members and businesses the opportunity to express their views regarding construction. Calls received shall be reviewed by FTA and RTD staff and will, as appropriate, be forwarded to the necessary party for action (e.g., utility company, fire department, Resident Engineer in charge of construction operations). Information available from the telephone line shall include current project schedule, dates for upcoming community meetings, notice of construction impacts, individual problem solving, construction complaints, and general information.
5. The FTA and RTD shall provide multilingual advertisements for local print and radio for affected businesses, throughout the project construction phase. In addition, a multilingual construction update shall be available regularly throughout the community at least once a quarter. The languages for translation shall include, but not be limited to, English, Hawaiian, Tagalog, Japanese, Chinese, Korean, Ilokano, and Spanish.
6. The FTA and RTD shall provide affected businesses with the support needed to implement promotions to help maintain their customary level of business throughout the project construction phase.
7. The FTA and RTD shall work with establishments affected by the East Kapolei-Ala Moana Center Segment construction activities. Appropriate signage shall be developed and displayed by the FTA and RTD to direct both pedestrian and vehicular traffic to businesses via alternate routes.
8. Traffic management plans to maintain access to all businesses shall be prepared for all project construction areas.
9. Contractors shall clean work areas daily for the duration of the project construction phase.
10. Provisions shall be contained in project construction contracts to require the maintenance of driveway access to businesses to the extent feasible.

11. To the extent feasible, in the East Kapolei-Ala Moana Center project segment, concrete decking along the cut-and-cover segments shall be installed flush with the existing street or sidewalk levels.
12. Wherever feasible, sidewalks shall be maintained at their current widths during project construction. Where a sidewalk must be temporarily narrowed during construction (e.g., deck installation), it shall be restored to its current width during the majority of the construction period. Each sidewalk design will be of good quality and be approved by the FTA and RTD Resident Engineer prior to construction. Handicapped access shall be maintained during construction where feasible. If handicapped access is not feasible during project construction, then alternative handicapped access shall be provided as necessary or signs indicating that such access is temporarily unavailable shall be displayed. Handicapped access that is temporarily closed due to particular project construction activities shall be reopened as soon as possible after those construction activities have been completed.
13. Construction site fencing shall be of good quality, capable of supporting the accidental application of the weight of an adult without collapse or major deformation. Fence designs or samples shall be submitted to the FTA and RTD Resident Engineer for approval prior to installation. Where major boulevards must be fenced, business owners shall be offered the opportunity to request covered walkways in lieu of chain-link fencing. Where covered walkways or solid surface fences are installed, a program shall be implemented to allow for art work (e.g., by local students) on the surface(s). Where used, chain link fences shall have slats that will be maintained in good repair.
14. The project construction site shall be maintained in a neat manner, with all trash collected daily, all wood and pipes stacked neatly, and all small parts stored in closed containers.

Concern #F-3: A detailed Safety and Security Plan during construction is needed.

The DEIS (Page 4-155) states, "...During development of the Construction Safety and Security plans, measures would be identified to minimize effects on communities and their resources that address specific consequences anticipated at each location with the various communities, as well as ensure the safety of the public and environment." However, no measures are described in the DEIS. The FEIS should include a detailed Safety and Security Plan that fully explains measures that will be taken to minimize the Project's effects on communities, their resources and how the safety of the public will be ensured during Project Construction activities.

For example:

- Assuming each contractor has its own construction supplies security force, please show where the costs for such security are estimated.
- Each contractor should prepare and implement a security plan to minimize risks of creating an attractive nuisance and of theft of material and equipment—especially dangerous construction equipment.

Concern #F-4: Does the Honolulu Police Department have adequate resources to control traffic during construction?

The DEIS (Page 4-155) also states that police services could be used to control and direct traffic. How would this impact Honolulu Police Department (HPD) resources? Can HPD provide the necessary staff? What would be the impact on higher priority law enforcement activities if HPD is used to manage traffic control throughout construction? The FEIS should include an analysis of existing staffing levels of the HPD and their ability to provide staff to control and direct traffic during project construction activities and how this impacts overall staffing at HPD for other law enforcement activities.

Concern #F-5: Electric power and/or telephone service may be lost during construction.

There might be an unanticipated loss of power/telephone service to commercial properties should an unknown power or telephone line be severed during project construction activities. What assurances can be given that this will not occur and what recourse for damages will be provided should a power or telephone outage occur?

Concern #F-6: Will sufficient vertical clearance be available along Dillingham Boulevard in the Dillingham Plaza area to provide to construct the elevated transit way?

The DEIS does not address whether sufficient clearance is currently available along Dillingham Boulevard in the Dillingham Plaza area to provide for enough space to construct the elevated transit way. Dillingham Boulevard in this area is very narrow. How can cranes safely operate in this area without hitting high voltage power lines that are located on both sides of this street?

Concern #F-7: Proposed mitigation measures for air pollution during construction should be made more specific.

The control measures for air quality listed on Page 4-157 of the DEIS should be revised and expanded as follows:

- Minimize land disturbance in any one area by project construction activities.
- Use watering trucks on exposed soil surfaces to minimize dust from project construction areas at least twice a day. Watering may be required more often if any visible plume of dust drifts off any project construction site.
- Use low-emission construction equipment when feasible.
- Cover all loads when hauling soil from project construction sites.
- Cover soil stockpiles if exposed for more than seven days at a time.
- Use windbreaks to prevent accidental dust pollution, especially when construction activities are located near sensitive uses (hospitals, schools or residential areas) or near commercial areas.
- Limit the number of project construction vehicle paths and stabilize temporary roads with water or soil binders.
- Maintain stabilized project construction area ingress/egress areas.
- Wash or clean trucks prior to leaving project construction sites. Install wheel washers if necessary. Soil tracked onto streets adjacent to construction sites shall be swept once a day to remove soil tracked onto them by project construction or delivery vehicles.
- Minimize unnecessary vehicular activities, and limit vehicle traffic to 15 miles per hour on project construction haul roads.

Concern #F-8: Proposed mitigation measures for noise during construction should be made more specific.

Project construction noise will temporarily impact existing land uses on KS owned properties. Therefore, it is requested that the noise measures listed on page 4-158 of the DEIS be modified as follows in the project FEIS:

- Develop a project monitoring plan with noise limits consistent with the construction contractor's noise permit.
- Construct temporary noise barriers or curtains to shield sensitive noise receptors from project construction activities.
- Equip project construction equipment engines with adequate mufflers and intake silencers.
- Strategically place stationary equipment, such as compressors and generators as far away from sensitive noise receptors (hospitals, schools and single/multiple family residences) as possible.



G. Indirect and Cumulative Effects

UltraSystems does not believe that the transit project DEIS adequately analyzes the Project's indirect and cumulative impacts on KS-owned lands along the transit corridor.

The DEIS lacks an adequate discussion in regards to the cumulative impact of parking around transit stations and its effect on available area parking. Given that Transit Oriented Development projects will be underway near transit stations, parking could be an issue and should be discussed in the Project FEIS. KS properties may be affected by the placement of parking near stations. If parking needs are underestimated, then parking will have to be increased at a later time to accommodate the additional parking spaces needed. Since the Pearlridge and Kapalama stations are near or adjacent to KS-owned properties, the planned parking and potential future expansion of parking could impact KS-owned properties and additional full or partial takes may be needed. These cumulative impacts should be discussed in the Project FEIS.

H. Section 4(f) Analysis

The Boulevard Saimin Restaurant, a cultural resource, is located on KS-owned property fronting on Dillingham Boulevard. The Boulevard Saimin parcel would be affected by the widening of Dillingham Boulevard (by approximately 10 feet) to accommodate the fixed guideway in the median in Dillingham Boulevard. A total of 696 square feet of parking area would be necessary to allow for the construction of the Project on this street. This take of a parking area qualifies as a direct use under Section 4(f). The City's acquisition of a portion of the parking area at the Restaurant will not only have impacts on the Restaurant parking, but also parking that is used for those patronizing the many stores that are co-located in the two-story building that houses the Restaurant. It appears that two of the twelve parking spaces provided for restaurant patrons will be lost as a result of the widening of Dillingham Boulevard. **What provisions can be made to compensate for the lost parking spaces that would be taken as a result of the land take? If sufficient parking cannot be provided on or off the building site, will the whole building need to be taken, resulting in the loss of the Restaurant and the other businesses housed in this building?**

I. General Comments on Project Mitigation Measures

UltraSystems' general comment on the mitigation measures included in the Project DEIS is that many of these measures are so vague that it will be difficult to implement them. To remedy this problem, a stand-alone mitigation monitoring and reporting program (MMRP) should be prepared for the proposed as part of the FEIS. The MMRP would include the following:

- All the mitigation measures included in the FEIS;
- When these measures are to be implemented (e.g. during Project planning and design/Project construction/during Project operation);
- Who is responsible to see that these measures are implemented; and
- A place for a City and County of Honolulu staff member to sign-off that the measure has been completed.

UltraSystems believes that the City and County of Honolulu should appoint a monitor or monitors whose responsibility would be to ensure that the MMRP is being implemented as project construction takes place. This could be a City/County staff member. The City/County staff member could work with the Project Construction Contractor to implement Project mitigation measures. A report should be prepared annually on the status of the MMRP and what measures were implemented, including evidence that they were implemented (copies of required

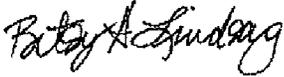
permits etc.); changes to measures that were implemented; and what measures were not implemented and why they were not. The status report on the MMRP would be presented to the Honolulu City Council annually for approval.

UltraSystems has found that for mitigation measures to be implemented they must be located in a stand-alone document and be easily understandable by all parties responsible for their implementation. A commitment by a public agency is also necessary to implement all project mitigation measures, with follow up by elected officials to see that the MMRP has been implemented.

Should you have any questions concerning UltraSystems' comments in this letter on the DEIS, please call me or Bob Rusby, UltraSystems Senior Project Manager, at your convenience at 949-788-4900 or email Bob at rusby@ultrasystems.com.

Sincerely,

ULTRASYSTEMS ENVIRONMENTAL INCORPORATED



Betsy A. Lindsay, President/CEO

cc: Mike Dang, Kamehameha Schools
Director, Planning & Development Division

These are just a list of some concerns over the City & County of Honolulu's proposed Light Rail Transit system. Many of these have been mentioned in various discussions, but none of the answers have been adequately answered by the City Transportation Director, Mayor, nor the Council.

1. Building costs are understated, future increases in construction, labor, and material costs are not reported nor mentioned. Also, some of the City's plans for the terminals/terminus are incomplete, missing substructures, rails, handi-access, etc. Was this to artificially deflate the reportable costs? If so the City's entire plan is flawed, and fraudulent.
2. No mention is made of a turn-around or depot. There will undoubtedly be a maintenance yard or some related facility to take the tram down for repairs. This is not mentioned.
3. The Administration has made repeated assurances that the project will be done with minimal impact to neighboring areas, residents, businesses. This cannot be the case. Building and construction guidelines are very specific, requiring x amount of relief space, and will require shutdown of adjoining lots, properties, streets and roads.
4. Many of the people who realized their properties will be (eventually) condemned via eminent domain are under the absolutely mistaken impression that they will be receiving the (at future time) full market value (fmv) of their properties. This is not the case. Research into the City's sojourns into exercising eminent domain muscle reveals that they set aside a lump sum amount, to be paid to defendants served with the Order Putting Plaintiff in Possession (i.e. City). Wording is usually like this: "The sum of \$xx,xxx deposited with the Chief Clerk of this Court by the Plaintiff as estimated just compensation..." Usually the award is a few pennies on the dollar of the actual value of the condemned and claimed property. The defendant usually has no recourse. Waiānae residents were notified last July that they were losing portions of their property, after construction had already begun for the emergency access road.
5. Regarding property, it is likely the rail system will negatively affect property values. Cities have trended that property values drop near an existing commuter or rail line. The noise negates, for most people, the benefit of proximity to a transit line. Many cities found that rail ridership decreased, in favor of buses, bicycles, and scooters.
6. I personally believe most people would favor a scooter over inconvenience of driving to a depot yard and park their car with thousands of others, to catch a rail to work.
7. The lifespan of a typical rail system is about 30 years. Thereafter, it must be 100% wholly replaced at full value at that future time. It's simply a matter of infrastructure breakdown.
8. The lifespan of a typical tram system (light rail) is about 15 years. Thereafter, it must be 100% wholly replaced, or else repaired to the point where it's economically unfeasible.
9. The mathematics of the City's plan to take 50,000 drivers off the road is not practical nor possible. Let's assume the City is extremely aggressive and forward-thinking in their planning. Let's say they build two rail systems, one that begins in point A (Kapolei area) and the other begins in point B (Downtown). Let's say there are 12 cars to a train (no longer considered light rail), each holding 200 passengers, which is 2,400 passengers total capacity per train, going a single way, or 4,800 passengers for the entire system. Let's say the trains will cross each other in the middle, so there is always a train going and coming in both directions. In order to meet the Administration's goal to take an approximate 50,000 drivers off the road at that future time, the trains will have to travel about 77 miles per hour, nonstop, in order to make the approximate 10 round trips each train will have to make, in an hours' time. This oversimplified math problem underlies the fatal flaw in the plan. The City's plan for light rail does not have the capacity for 4,800 total passengers at any given time. This would be rush hour in the morning, from 5:30AM to 8:30AM, and 3:30PM to 6:30PM. It is not mathematically possible to do it with the above configuration, nor with the City's proposed version, which is much smaller passenger capacity. This may be decried by the Administration as "Mickey Mouse Math" but the figures cannot be doubted. The rail will not accomplish what it is envisioned to.
10. The City's proposed 6,000+ jobs to directly or indirectly support the rail system, operations, maintenance, support services, administration, and vendor services, is not economically sustainable. The vendors have the best bet, at least people will stop on the way to buy coffee,

pastries, morning paper, etc. But wait, they can't because the system has to run without stops to make its rush hour quotas.

11. The City's Transportation Department has in effect given their current employees a potential for higher-paying and more executive jobs, "fresh" and new. The current employees are capped where they are at, but the Rapid Transit Division (the most expensive and largest Division by staff and dollars) is a way for them to move up. See their presentation here: <http://www.honolulu.gov/dts/dts+fy2008+operating+budget+request.pdf> If you scroll down to page 7, you will see "Rapid Transit Division", 35 proposed executive and administrative support positions, costing a whopping \$2,338,644 in staff costs, dwarfing their next largest Division by over \$500,000, but has only 1 position more. This indicates that, given civil service positions and current pay scales, these are much higher and more executive positions, possibly (POSSIBLY) created this way by the Transportation Department to give their currently ceiling'd staff someplace to go, and retire happily with a healthy retirement pay.
12. No amount of ridership fees could make up the construction, maintenance, and daily operations costs of the entire rail system. Notwithstanding the payroll costs. The majority of the costs will become personnel-related, such as 41+% fringe rate, immediate salaries plus vacation payouts and other benefits. Throw in maintenance? That's also a personnel cost, with OT attached, at City & County rates. You know, 12 maintenance workers scheduled to perform upkeep, each files OT requests, however only 1 or 2 actually do majority of the work. A recent audit found many road crews operate in this fashion. However the audit was for City internal use only.
13. No amount of taxes can make up the total cost plus ongoing upkeep. The burden on the taxpayers of the state would be astronomical, it could not possibly be estimated.
14. People who voted "YES" did not realize, they were not really indebting themselves, but their progeny, to a lifetime of debt service to this system. It cannot possibly be completed before, say, 2025 or 2030, when most of those who voted will be at or nearing retirement, and it will no longer make a difference for them. Many people simply jumped on the bandwagon without really thinking things through.
15. A raised rail system lumbering many stories above buildings and 1-2 storey homes and apartments in the proposed areas would ruin not just the overall landscape, but many people's enjoyment of the view looking out not to the ocean, but the SKY.
16. The Administration's claim is that if they get this project going now, they can jumpstart the state's economy and provide much-needed jobs through construction. This is short-term a truth, however if there exists no money to begin with, and the Council on Revenue's forecast shows a current year deficit, with factors of debt in the out-years, where is the funding going to come from? It reminds me of a very ambitious building project in Downtown, that sat for many years until another investor came by. Only the Federal Gov't can deficit spend. How can you ambitiously plan alternate and future routes (as the Council is debating now) without having any up-front direct revenues, investor venture capital, bond interest, or other form of monies on hand to even "break ground"?
17. Construction costs are years away, when materials, labor, and rates will be much higher. Final completion costs can be many times the \$5 Billion thrown in front of the hapless public. And, once construction begins, final completion can be upwards of 20 years away, including the various legal battles and hurdles the City will no doubt face, in battling hundreds of home and landowners, businesses, and action groups. It will be unprecedented in our State's history, and will likely bring embarrassment to us nationally.
18. Speaking of attention, it is likely that people will prefer (as they do now) places such as Tahiti, Fiji, Thailand, and New Zealand, over Oahu anyway. Many tourists surveyed by the HTA recently said they'd never come back if the beaches eroded. What happens if (i.e. by the year 2030) the beach in Waikiki is a memory, hotels are literally flooded, AND there is a lumbering, leviathan, hulking, clackety, metallic silver worm snaking its way through Downtown? Realistically, do you think any tourists would come to Honolulu, except to use it as a springboard from the Mainland USA to their exotic destination in the far Pacific or Asia?
19. Other states that the Administration quoted as having successful rail systems have something that Hawaii will never have, regardless of how much development we want to create - land space. If anything, Hawaii - due to current erosion - can do nothing but lose land space, at least

in Honolulu County. In order for the rail to be plopped down, people who are already there have to make way. As our proud and defiant mayor has proclaimed in various ways, "...anyone opposing this will have to just get out of the way..." The first time he said it on TV, we passed it off to his frustration and lack of self-control. Thereafter, it is a clear indication of absolute superciliousness, self-love, and hubris which I do not ever recall seeing in any of our recent mayors of my memory. The sign of a bad publican is to - even modestly - threaten to shove it down the peoples' collective throats when his way is challenged, and his personal progress slowed.

20. The Administration does not inform the public of the following: Chicago Mass Transit (Chicago Transit Authority), one of the original models for an earlier proposed transit system, is bankrupt. If not yet, pretty darn near. The cost of doing business has long overrun the intake due to ridership, which has decreased over the last 30 years. Even their bus ridership is down, largely due to increased crime in poverty-stricken areas near the center of town. Unfortunately for us, Pearl City & Mililani are becoming what Kalihi and Liliha have long been - our native slum.
21. Sound is a pressure wave that emanates radially outward from its source, decreasing as the inverse square of that distance the listener is from it. The City's contention that erecting short walls, combined with the raised platform, will decrease noise to a minimal level, is preposterous beyond laughable. Any system, even a rolling wheeled vehicle, creates a significant amount of noise, and particularly at night. Anyone who lives near the University or along the H-1 between McCully through Pearl City knows this. Even if it is no louder than a small grass whip, it will be noticed, and people will be driven out. I used to live in a small apartment on Thurston Avenue in Makiki, and the simple act of the bus rolling at 11 at night was enough to jolt this young child - at that time - awake from a light sleep.
22. A research paper by Randal O'Toole from the Cato Institute, "Does Rail Transit Save Energy or Reduce Greenhouse Gas Emissions?" (<http://www.cato.org/pubs/pas/pa-615.pdf>) asserts that the following would be more cost-effective and reduce greenhouse emissions than rail transit:
 - Powering buses with hybrid-electric motors, biofuels, and non-fossil sourced electricity
 - Concentrating the major load of bus service to heavy-load routes, and smaller buses for off-peak and lower demand areas
 - Building new toll systems and coordinating traffic signals to relieve highway congestion that contributes to the waste of over 3 billion gallons of fuel annually
 - Encourage people to purchase fuel-efficient cars. Get 1% of commuters to switch to hybrid cars costs less and saves more energy than trying to get 1% to switch to public transit, and most of those keeping their cars. After all, the rail only runs on one side of the island.
23. This same research paper by Mr. O'Toole reveals the average light rail system of those studied, requires over 4,000 BTU and generates almost .7 pounds of CO2 PER PASSENGER MILE. To traverse the estimated 26-30 mile rail stretch, one way per trip (not per day) would require an average of 104,000 - 120,000 BTU in energy and generate 18 - 21 pounds of CO2, more than average of city buses running for one hour.
24. This same research paper asserts that the mere construction, over many years, of the system itself, would generate more CO2 and cost more in energy and fuel consumption, than the rail, and may "never be recovered by the savings (of constructing the rail in the first place).
25. Due to Homeland Security regulations involving public transportation, the City & County would have to establish, and integrate into the Honolulu Police Department, a separate Honolulu Rapid Transit Police force, or else divert current - or future - officers to that duty. Security screens may be necessary at depots as well, adding to delays (but wait, they can't stop right?).
26. The Administration claims that the economy will be stimulated, looking at (i.e.) Denver, Portland, and San Jose light rail development, don't realize that those systems were supported by large tax or other subsidies, something dramatically lacking in Hawaii's economy. Even the current tax collected for transit is far short of proposed levels they would have to be at for the system to be a reality.
27. Finally, no mention is made as to whether this light rail system can accommodate passengers (i.e. from the airport) with large luggage, or whether stowage space is or can be provided for safety, comfort, and security of others?

2/4/09

To: Wayne Yoshioka
From: Robert B. Marrone

Aloha,

On page 1-17 of the DEIS, Figure 1-10 indicates Use of the HOV lane reduces a.m. town-bound travel time by an average of 12 minutes. This appears to be a greater reduction in travel time than what a full service rail line, with all planned stops, would provide. Further, it can be presumed that additional HOV lanes would reduce travel time by an even greater margin. Hence, I would like to know why additional HOV lanes would not be the primary option under consideration.

Sincerely,



Robert B. Marrone
1303 Dominis St. #1
Honolulu, HI 96822

Honolulu High-Capacity Transit Corridor Project

Welcome to the Honolulu High-Capacity Transit Corridor Project's Public Hearing for the Draft Environmental Impact Statement/Section 4(f) Evaluation.

This public meeting and hearing has been designed to inform the public about the transit project, explain materials contained in the Draft EIS, answer questions from the public, and collect public input on project issues related to the Draft EIS, Section 106 of the National Historic Preservation Act, Section 4(f) of the U.S. Department of Transportation Act, and floodplains affected by the project.

Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulutransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulutransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: CORY KOT Address: 2317 WAIOMAO ROAD

Phone: 384-2555 HONOLULU, HI 96816

E-mail: _____

Comment(s):

2/6/09.

1.

- Where are the "five distinct transit technologies" under review in the 2008 DEIS?
The Federal Register/Vol. 72, No. 50 of March 15, 2007 shows a "Notice of Intent To Prepare the Draft EIS".
- The Federal Register clearly states that: "Fixed Guideway Alternatives, which would include the construction and operation of a fixed guideway transit system in the corridor between Kapolei and UHManoa with a branch to Waikiki. The Draft EIS would consider five distinct transit technologies: Light rail, rapid rail transit, rubber-tire guided vehicles, a magnetic levitation system, and a monorail system."
- Will the Mayor and City Council of Honolulu open up the transit process to ALL technology manufacturing companies who submit thru the RFI/RFP process? As they say: "May the best man win".
- Where are the cost numbers in the 2008 DEIS for the "UHManoa with a branch to Waikiki" extensions?
- When will the current Design-Build Contract RFP-DTS-0900015 on the Department of Budget and Fiscal Services Division of Purchasing website document be available to be viewed by the general public on Oahu? -Will it be displayed on the transit site for public review the way the 2006 AA & 2008 DEIS documents are?
- What state procurement laws or codes are being violated if the original approved ordinance was authorizing the city council to review qualifications & system requirements for potential bidders prior to the administration seeking and soliciting the RFP?
- "Building rail transit NOW is the most "cost-effective way" to avoid even more congestion".
- Who on earth thinks that spending \$5.767 Billion to \$7.173 Billion dollars for only a short 20 mile rail system is "the most affordable, cost-effective" solution for Oahu?
- Will this equal \$288 million per rail mile, up to \$358 million per rail mile for just the 20 mile section build?
- Where is the true per-capita spending breakdown in the DEIS for this multi-billion dollar transit project?
- Where is the Rail Transportation Spending per capita by state? -Where does Hawaii rank?
- On 2/2/09, Minnesota Congressman Jim Oberstar claimed that the CEI, or 'cost effectiveness index' federal requirement is widely viewed as a hindrance to transit projects and it will be modified, and not just to be amended, but eliminated. Is this true?
- "As soon as there is a Federal Transit Administrator I will encourage that person to, by executive order, erase it from the books. And if they don't we'll do that in legislation." says Rep. Jim Oberstar.
- Today's 2/6/09 Star-Bulletin staff story reports that the RFP for the first 6.5 mile transit segment will have transit stations built and constructed later in another contract.
- How can the Mayors aggressive first segment completion target date of 2012 be useful for local residents without the transit stations completed?
- Who will ride a system that is built in the empty fields of Kapolei with zero surrounding ridership?
- How will the current flawed transit route serve residents in high population areas that were skipped?
- Why was the first 20 mile route not placed in the high population areas of Ewa Beach/Ft Weaver rd., Salt Lake, & thru Waikiki up to UH Manoa?
- "By year 2030, up to 90,000 riders per day are 'expected' to use rail".
- How can Oahu transit ridership at just 6% today islandwide, only go up 1% with the building of "rail transit", to a 7% ridership total in year 2030 as the DEIS states? (Table 3-13, page 3-23)
- Will transit ridership only increase 1% by year 2030 after spending multi-billions on "rail"?
- Now that America is going bankrupt and the economy is in the toilet, how can Oahu residents afford the added new tax burdens of building, maintaining & operating and subsidizing a massive multi-billion-dollar project that only a small minority percentage of current bus transit riders might use (6%-7% total on Oahu)?
- Oahu has become over-populated because we refuse to stop the over-development of the West side of this island.
- Is there a way to convince over 140,000 local residents who were not in favor (49%) of "steel on steel

2.

rail" and who voted against it at the Nov.'08 ballot vote, that it was needed or voted in without pro-rail propaganda and union funding force through support of a one-sided view to push and shove the passage of this flawed rail system onto the Oahu voters?

On 4/23/2007, on Page A1 of the Honolulu Advertiser: "Sewage mandate disputed; Inouye says EPA order to upgrade plants would "bankrupt" the city".

-Is Sen. Inouye correct to claim that when the Feds force the issue of upgrading the city waste water treatment system at a cost of over \$1 billion, would that "bankrupt" Honolulu?

The 2006 transit cost was near \$3.5 billion, now @ \$6.4+ billion for the same 20 mile route.

- Why has the cost of "rail" transit gone up billions since the 2006 AA report?

The so-called 'required' 8 page slick brochure, (Oahu taxpayer funded), claims that "One day, rail will extend even further to HNL, Waikiki, UHManoa, and Kalaeloa".

-How many multi-billions more will this cost and with what money and funding?

-Where is this information on future rail extensions cost in the 2008 DEIS?

-Will the electricity on Oahu come from burning fuel and barrels of oil at local HECO power plants to power "rail"?

-If "rail" will be powered by burning fuel and barrels of oil at HECO, how does this protect the environment? What are the energy costs for this new transit system per year?

-Will transit stations use and need even more power from HECO with lights, elevators, escalators, and T.O.D. shops and retail stores at each location?

-What is the amount of energy needed and used to build the new transit system?

-Where is the cost listed in the DEIS for the amount of energy required to build the new 20 mile transit?

-Is the data from the US Department of Energy correct, that suggests that on a national basis, average energy use per passenger mile is higher for transit than for automobile travel? According to the U.S. Department of Energy: Energy use per passenger mile (Btu) = 1,659 for fuel-efficient cars (Prius), 2,784 for rail transit.

This may be our final opportunity to give a public statement during this stage of the fixed-guideway process. My effort can hopefully be a useful commentary towards a question and answer seeking probe that I feel I must submit. As a full time Hawaii resident from the early 90's, I've grown to appreciate the natural beauty of Oahu and the panoramic views of a sleepy surfside mini-metropolis hugged by vintage suburban dwellings. I tried to sit down and write a comprehensive list of topics on the fixed-guideway "rail" transit issue. I didn't know where to start. The complex and twisted course the mayor and city council have begun has complicated the transit plan with political manipulation and a popularity contest involving high powered union-support coupled with large campaign contributions with a mix of mainland interests.

I hope Oahu is not evolving towards a society of socialistic reform with a loss of independence with local cattle and tamed worker bees packed & crowded into standing room only rail cars, and jokingly maybe even into a 'stinky' situation.

One of the more unusual events that unfolded was a few 4-4 tie votes, two weeks running, by the city council on Bill 80 ('06/'07) on the Transit Technology Selection. This was an interesting display of a split decision problem. An unavailable council member on the panel of 9, was unable to cast any tie-breaking vote, for or against, for two weeks of voting on the selection. 8 council members tied on 4-4 votes 5 or 6 times on different third reading versions: This should have been crafted to allow all available technologies & advanced modern innovations for fixed-guideway transit solutions submitting thru a transparent RFI/RFP process.

3.

I hope all of the questions here can be answered in a fair and open transparent "sunshine" process for the benefit of the Hawaii public. Thank you.

Cam Kot. 2/6/09.

February 6, 2009

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

Subject: Comments to the Draft EIS

I have been a passenger on the Vancouver Skytrain Expo Line and also on the Vancouver Skytrain Millennium Line and both have quite different constructed guideways. The guideway for the Expo Line is a larger concrete structure with each a separate guideway for each direction. The Millennium Line columns are much smaller with a single guideway (tracks) in both directions and a less intrusive structure. Also the approximate 14.6 mile system (more or less) of the Millennium Line was completed in two years at a cost of about \$700 million in U.S. dollars and completed under budget of a \$1 million in U.S. dollars in 2002. The Millennium Line costs also included 12 transit stations and the Bombardier's MK II vehicles built in B.C. at Bombardier's Centre for Advanced Transit System

Each of the transit stations of the Honolulu High-Capacity-Transit Corridor should have provisions for attractive retail outlets like newsstands, grab and go coffee/snack bars, florists, specialty stores and bank machines. This will help create more activity and extra eyes on what's going on and in and around stations, contributing to a safe and more secure environment and convenient shopping for people as they enter or depart the station. Today's consumer expect more convenience. Also convenient retail and creative art pieces will help create a memorable journey.

Creating a safe environment should be a fundamental principal of station design. Wrapping the new transit stations with glass, letting everyone see in and see through the stations. The elevators also should be enclosed in glass instead of other materials. Also a Station Manager's Office in each that is visible will help and there should be barriers in each station to ensure only paying passengers enter and leave.

Each side of the transit vehicles should have three (3) wide pairs of doors to allow passengers and bicycles to board and disembark quickly. Quick connection to local and regional bus service is a must to ensure more island-wide passengers to use this form of public transportation. The Middle Street Transit Station with its planned multi-deck parking planned will help for PUC and Windward residents to use the Honolulu High-Capacity-Transit System in both directions east and west as land is limited for parking cars for this elevated rail system.

Mahalo and blessings,



Wendell Lum (member, Kaneohe Neighborhood Board No. 30)

February 6, 2008

Mr. Wayne Yoshioka, acting director
Mr. Brennon Morioka, Director
Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

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

Ms. Katherine Puana Kealoha, Director
Office of Environmental Quality Control
Department of Health
State of Hawaii
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813

**Honolulu High Capacity Transit Corridor Project
Draft Environmental Impact Statement
Comments**

Aloha:

The opportunity to review the environmental impacts of this project is appreciated.

First off let me introduce myself, my educational background is in structural engineering at the UofH, I hold a BS, and MS degree from the department of Civil engineering. I currently work at an engineering firm and am working towards obtaining licensure as a professional engineer. I am involved with several engineering organizations including currently serving in leadership roles as president of the ASCE younger members, and also serving on the board of directors of the Engineers and Architects of Hawaii (EAH). The following comments are my own and should not be associated with my employer or the organizations I am involved in. or anybody else.

I should also mention that I did not have sufficient time to go over the document in detail, these comments are the product of a quick first pass reading of approximately 80% of the document. I trust others will pick up on any details I will miss.

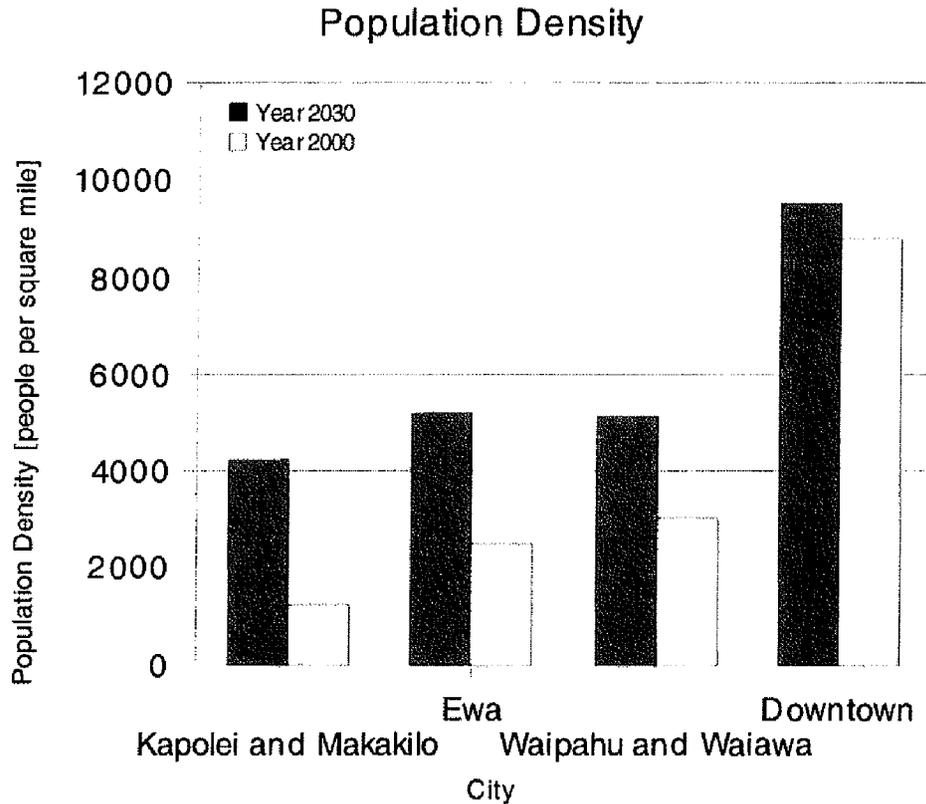
First of all, taking the broad view, this project seems to justify the need for transit based on projected population growth, not needs that exist today. This seems counterintuitive to me, first of all the immediate needs that exist today should take precedence over the needs that are possible in the future. My first question:

1) Why is the project supposed to be starting in the Kapolei end?

It makes more sense to start with constructing the Honolulu end of the project. The justification for my

1 of 11

argument is plain to see, given that mass transit works best in high density areas. Downtown has the high density now, even after the 2030 projections, Downtown will still have a substantially higher population density than the Kapolei end of the proposed system, as shown in the bar graph below, produced with data in the EIS:



Another reason for starting in town is that in the unfortunate event that the project goes over budget, or financing falls through and all the phases cannot be completed the maximal benefit to the public would be achieved if the finished part is in Downtown. The greater density of the downtown area will ensure better ridership of an incomplete system, my next question:

Why is population growth as opposed to population density used as the primary criterion for justifying the planning of the system?

And here is a question relating to the source of the 2030 number:

Are the projections of population growth based on data before the economic “crisis” and recession we are currently in? If the current downturn has not been factored in, the projections should be revised accordingly.

Although I did not go over the financial aspect of the report, I suspect that it would be best financially to do the downtown end because construction within the highly developed area will be more expensive. As inflation continues the relentless march on, I expect the earlier we spend the money, the better it will be for the project. To conclude: While I do support the concept of having a rapid transit system in

Honolulu, the implementation of the system as it is presented in this impact statement has some flaws, the most obvious to me is that this project should start at the town end, there is no question in my mind, the final EIS should be written with that assumption.

One of the other critical things that is not addressed sufficiently in the EIS is the changes in land use that are direct and implied. What I see is a lot of agricultural land being developed and this action is just dismissed. The final EIS should include consideration of the loss of agricultural land indirect to this project. That is the land lost due to developments that this rail system supports. Looking at figure 2-5 on page 2-15 the initial line of this system is all farm fields ! I believe that we should tread lightly there and endeavor to preserve land that can be productive agriculturally to be used for that purpose. Some of this land even has a special classification to recognize how good it is. The land is conferred with the impressive title of being "Prime", "Special", or "Unique". Land in Hawaii is a finite resource, the proposed rail route permanently changes the use of 88 acres of land to non-agricultural and the report calls this insignificant. I believe that absolutely any piece of agricultural land that is converted to a non agricultural use is a very serious matter and should not be taken lightly. The cavalier attitude to developing agricultural land troubles me deeply, our own Governor Linda Lingle makes good arguments (quoting a .gov website):

"Hawai'i produces only 15 percent of its own food. That's not acceptable and shouldn't be for the State. We need to take action now to increase food self-sufficiency for Hawai'i and preserve and strengthen the agriculture industry for future generations.

We must increase our efforts to protect the best agricultural lands from development and preserve them for agriculture into the future and we must strengthen our commitment to providing infrastructure and water for agriculture. Increasing our food self-sufficiency will contribute to our own communities rather than sending our dollars out of the State for imported food."

Again, any reduction of agricultural land is counter to our state's goals and great lengths should be taken to avoid such an action. The quick dismissal of the significance of the agricultural land involved in this project cannot be in the final version of the EIS, and mitigating measures must carefully be considered for all the agricultural land affected either directly or indirectly.

The claim is made that "all of the affected properties designated as prime, unique, or of statewide importance and/or actively being farmed are owned by individuals, corporations, or agencies that plan to develop them in conformance with the Ewa Development Plan (DPP 2000)". However, on the DPP's website for the Ewa Development Plan, the first sentence is "The Plan protects prime agricultural lands". This discrepancy must be corrected in the final version of the EIS. I would like the following loaded question addressed in completely in the final version of the EIS:

It is not acceptable to use prime agricultural land as a site for a maintenance and storage facility when a clear alternative is present.

Is this transit system being built to benefit the people of the island to help the congestion problem or is it a tool for the owners of the undeveloped land that is in agricultural use in the right hand side of figure 2-5? I do hope that the latter option is not true, but whoever owns the large tracts along the route stands to profit greatly. Those land owners should be paying the largest share of the construction cost of the

rail system. From what I gather this is not the case. I have been taught that while serving the public, the image of corruption should be avoided as much as corruption itself. The final EIS should leave it's readers absolutely no doubt as to who the beneficiaries of the project are. (it should benefit ALL of the people on Oahu) I don't want people living in areas on the island removed from the rail system footing the bill for an improvement that serves primarily to make large landowners richer.

If as a last resort, the rail line must fly over agricultural land, especially land classified as prime, unique, or statewide important, I suggest that the land underneath the line be allowed to remain cultivated, the rail above could obtain an easement on the agricultural land instead of condemning it outright and changing its use. Thus the only land that would be made useless for agriculture is that occupied by the piers supporting the rail. Further mitigating measures would have to be taken due to the effect of shading, and the area of the piers, but at least the impact would be minimized.

Another mitigating measure that should be considered is a change in the route shown on figure 2-5. It appears that there is more development down on the 'Ewa side of the page (lower right) The final EIS should seriously consider turning down Fort Weaver Road and continuing down to the bottom of the page ending up near Geiger Road an extension out to Kapolei could be added later This would keep the agricultural areas untouched while serving an area that is already developed.

On page 1-1, in the first column under section 1.1.1, The wording implies that the OR&L was a passenger system serving the 'Ewa plain. This is a bit misleading, as far as I know the OR&L was primarily used for transport of Agricultural goods, with primary cargos being cane, pineapple, trash, and oil. Passenger service was not the primary purpose of that line Here is my question:

Can you please state accurately what kinds of things were carried on the OR&L, and expand on the history of the OR&L a bit to avoid misrepresenting the history?

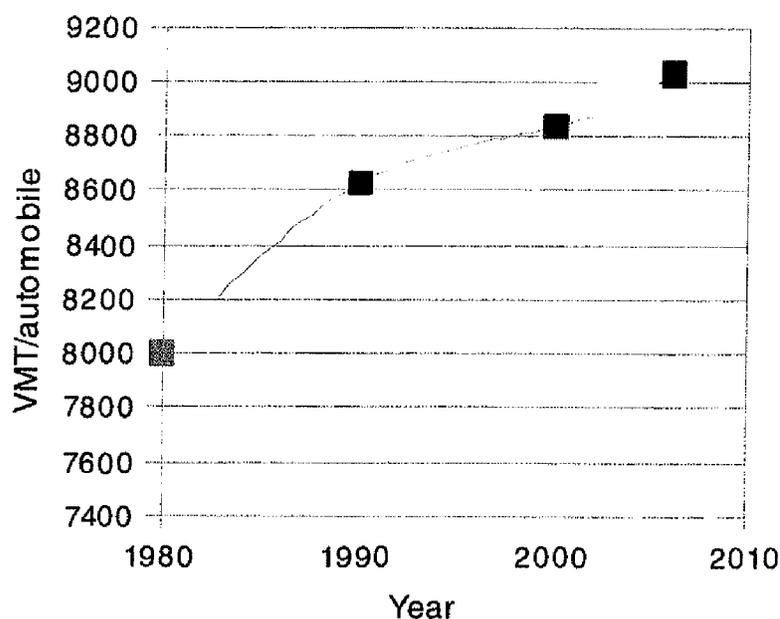
And another one comes to mind:

Why can't a rail system connecting parts of our island carry light cargo when passenger traffic is light (at night)? This would keep a few trucks off the road, and would curb emissions a bit. The planners of the rail system should give serious consideration to carrying a more diverse cargo to get the most benefit from the system, and the conclusions of that consideration should be included in the finalized version of the EIS document

On page 1-2 a graph is shown indicating population, vehicle registrations, and vehicle miles traveled with respect to time. When reviewing this graph, I noticed a disturbing trend that indicates a problem with the way development on Oahu has taken place. Since I am too young to have had a say in the decisions to create the "second city" of Kapolei, I will make a slight digression to state that the "second city" concept seems like a terrible idea for many reasons that I may touch on in reviewing the impact of the proposed rail system. Getting back to figure 1-2, using the same data, but presenting Vehicle Miles Travelled (VMT) per registered vehicle vs. time, a clear trend towards longer drives can be seen. If VMT is plotted per person, a similar trend exists. Please take a look at the graph below:

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VMT per automobile registered by year



The trend towards more driving per person is an indicator of fundamental problems in our planning. So another question, that has far reaching implications comes to mind:

Will the proposed rail system increase VMT per capita by supporting more development in Kapolei, thus more people with cars with long commutes, or will the system decrease VMT per capita by providing alternatives to driving?

Looking at Figure 2-7, it appears that the sharp curves leading into the airport would substantially slow the system down:

Has consideration been made to reconfiguring the commuter terminal of the airport to allow a more streamlined rail route at that location?

On the first column of page 3-2 in 3.1.1 The modeling approach is "proven effective" I would like to see some back up given, and a estimated margin of error presented with the model's results. This error should be based on modeling existing systems and changes to them, and comparing the model's conclusions with actual measured data.

On page 3-7 under TheBoat Service heading, the second paragraph describes shuttle system to get TheBoat patrons onto other modes in the public transportation. I would imagine a similar system of supporting shuttles would be devised for the proposed rail transit. This supporting shuttle system and revisions to the bus schedules to accommodate the rail system should be a part of the final EIS and should be evaluated in the same level of detail as the rest of the system.

The data presented in figure 3-1 shows a decrease in average bus travelling speeds, and is attributed to

increased traffic congestion, I would like to know if any of the trend is associated with changes in the bus schedule and routes. If the bus has relatively more peak time runs in the city now and more runs in off peak time and in the less travelled areas in the past, that would also contribute to the trend. I would like this explored and presented in the final EIS, with summary of all the factors and their respective contributions that might cause the trend shown.

In section 3.4.2, effects on Transit. The supporting calculations and data are not presented. Along with any projected information, the assumptions going into the models should be clearly stated, this seems to be a problem typical to the entire document.

I would like the final EIS to consider the possibility of express routes that do not stop at all stations. If all the trains skipped every other station and were staggered such that all the stations were serviced, could a faster travel time on the one track be achieved?

On page 4-4, under 4.2 it is stated that the project is not expected to result in substantial adverse effects on property tax revenue, however a couple lines above, a 1.2 million reduction in tax revenue is mentioned. First of all, I assume the 1.2 Million is an annual number, is that correct? I am not a poor man, however 1.2 Million, although pale in comparison to the costs in this project, it a very significant number to me. I would like the final EIS to state a mitigating measure to account for this loss of revenue. I suggest for a mitigating measure: re-zoning already developed areas along the route to a higher density to make up the deficit in property tax.

The proposed mitigation options to the impacts to Community Services and Facilities outlined in section 4.4 should be described in detail on a case by case basis, not enough detail is given in the draft.

It is stated that development and re-development along the project as well as scale of the transit system would not have substantial effect on community character - this statement is false, and should be omitted in the final version. The scale of the transit often dwarfs surrounding architecture, and would certainly alter neighborhoods in potentially positive and negative ways. These effects should be explored and reported in the final version of the EIS

Regional pollutant emissions are supposed to be reduced between 3.2 and 4.0 percent Because these numbers are not presented with margins of error, I am led to question the rigor of your calculations. In the final EIS the numbers should be presented with margins of error and a probabilistic analysis should be undertaken to get a better understanding of the chances of the expected performance of the system. For instance, what life cycle of the system's various components is assumed in your calculation? are the emissions associated with material acquisition, manufacture, transport, construction, and maintenance of the entire system, and the no-build options considered in the calculation? If there is no consideration of these factors in a life cycle analysis type of calculation, there should be. Otherwise, present your assumptions and calculations in the final report. Looking only at tailpipe emissions for the two in place systems could lead to faulty conclusions.

In section 4.9, vibration is said to have no impacts. I have done some assessments of vibrations on structures in my professional function, and based on my personal experience I do believe that with appropriate measures there is probably going to be no damage and everybody will be fine. However the perception of neighboring tenants and owners will be that the new train is causing every bit of damage to their properties. The EIS should consider this hypersensitivity to vibration that will be caused by the installation of the new system, and should outline a plan to do thorough pre-construction surveys of the adjoining properties to avoid having the repair bills for unrelated damage sent to the government.

My comments relating to the emissions calculations also apply to the energy, provide margins of error, probabilistic analysis, life cycle assessments, and energy associated with material procurement, manufacture, transport, etc.

On page 4-9 under the summary of section 4.14, proposed Mitigation Measures, strike "or" and replace with "and". The world needs more trees.

On page 4-13 under "Farmlands" it is noted the much of the 'Ewa plain is classified as farmland and prime agricultural land. How is it expected to have the required population density to support transit stations there? There should be no stations planned on farm land, it does not make sense.

Page 4-20 under Mitigation it is stated that the effects on different types of land uses in the study corridor would be minimal. This is false, building a stations in the middle of a piece of Agricultural land will catalyze the change in use of the land in the general area from agricultural to something non-agricultural. This effect would be anything but minimal and is against our state's goal of improving food self sufficiency Mitigation of this must be described in detail in the final version.

Figure 4-7 on page 4-21 does not show the full extent of the actively farmed land in the hatched area, a closer look should be taken at the aerial photograph underlay, it can be seen that the cultivated land extends significantly beyond the boundaries shown. If this error is carried into the calculations, they should also be corrected.

On page 4-27 near the end of the "Methodology" text block, it is mentioned that calculations are based on average persons per household and that displaced employees is based on a similarly rough number. In the final EIS, a census should be conducted to get the actual definite number, go knock on some doors and talk with the people to determine how many are there.

Table 4-5 on page 4-26 should include parcel acquisitions, partial and full by land use.

On page 4-26 it is stated that existing land uses would not change, a large portion of the system is based on the assumptions that land use WILL change. All occurrences of this discrepancy should be corrected in the final version of the EIS.

On page 4-28 the land in 'Ewa is described as rural and agricultural, this does not justify starting construction of a mass transit system out there. Transit serves population density, start the line downtown, set aside space for it in Ewa just in case it is needed. Building the line where there is no dense development does not make sense

On page 4-33 there is a typo on the third line under the Cemeteries heading, please fix it for the final version

On page 4-55 It states that income determinations cannot be made - this is a false statement, The authors could conduct their own census. This should be done for the final EIS

On page 4-55 the the middle column in the left side describes a community that embodies many of our cultural ideals including family cohesion, sense of community, local food production, etc. great care should be taken to preserve this, the group should be kept together and if they are relocated, it should be to such a place where they will be able to practice a subsistence lifestyle similar to what the currently enjoy. Any relocation should be of the group as a whole and should be to a place that has

potential for high agricultural production and a similar proximity to the other communities.

In table 4-10, the word "Dominant" is used in 4 separate occasions, and the word "prominent" is used on three other occasions. The system design should fit in a bit better, so such strong words don't need to be used.

In the doctored photos marked SIMULATION, Power lines and street lights are shown adjacent to the fixed guideway. I would like to see utility transmission conduits incorporated on the fixed guideway and street lights mounted to the guideway wherever possible. The installation of the rail system should include removal of power poles and light poles and overhead power lines wherever possible, this would lessen the visual clutter experienced by citizens that look skyward and would make the elevated structure appear more like it belongs there.

In figure 4-19 the streetlight shown would cast a dark shadow under the fixed guideway in the configuration shown, mount some lights on the bottom side of it instead and remove the high light.

In Figure 4-24 consider planting some trees in the median between the gigantic posts

The caption for figure 4-25 states that the guideway as shown would not noticeably conflict with the view's character - I disagree with this statement.

The caption for figure 4-25 states that the existing trees would soften the effect. This is false, the picture clearly show existing trees on the left side of the figure being removed, I suggest planting new things on the median to soften the effect.

Figure 4-29 This view is quite ugly it would look much nicer at grade or underground... also the reflection in the water is not true to life, the building's reflection would obstruct that of the station.

Figure 4-36 - I feel sorry for the people living in the top floor of that building... I suspect the beam element supporting the fixed guideway, it appears that the beam's section should be deeper, has a preliminary structural analysis been done to establish that the member shown is realistic. Also, the straddle bents could be done in a more architecturally pleasing way.

Page 4-93 add to the points under mitigation:

- *Relocate visible utilities onto the fixed guideway structure whenever possible to mitigate visual clutter caused by all of the things above driver's and pedestrian's heads
- * Design an architecturally interesting cast column that is appropriate to the surroundings (the plain round one is ugly)
- * Colored concrete should be considered for all elements.
- * Employ post-tensioned concrete columns or steel columns as opposed to the conventional ones shown to minimize member size and mitigate the visual impact of the columns on the surrounding landscape.

On page 4-99 in the first column near the top of the page it is stated that geologic strata underlying the track is a factor in vibrations transferred to adjacent buildings. Does this statement hold true for elevated systems such as the proposed one?

8/6/11

The DEIS states that the proposed Build Alternatives will have no effect on endangered and protected waterbirds despite the fact that waterbird habitats exist within the project boundaries. The justification for this claim given in the DEIS is that

“Over time, the waterbirds would adjust to new structures built for the Project since the wetlands would remain intact. This is expected because the waterbirds have continued to occupy the wetlands after the construction of nearby buildings and overhead utilities and the construction or widening of adjacent roads or highways.”

Have any studies been conducted that investigate the environmental impacts of development on endangered waterbirds and protected waterbirds and their habitats? If so, please provide sources for each study and state whether or not the study findings support the DEIS claim that there will be no effects. Did the previous construction activities (construction of nearby buildings and overhead utilities and the construction or widening of adjacent roads or highways) result in noise intensity and duration, site disturbance, and all other environmental impacts to the endangered waterbirds' and protected waterbirds' habitat equivalent to each of the proposed Build Alternatives? If so, please provide evidence that supports this claim. Was the proximity from previous construction activity to wetlands and/or endangered waterbird and protected waterbird habitat the same as the proximity from the proposed construction activity to the wetlands and/or endangered waterbird and protected waterbird habitat? Will the noise in the areas where endangered waterbirds were observed remain the same after any of the proposed Build Alternatives are complete and operational? If not, the environmental impacts of noise on endangered waterbird and protected waterbird habitat must be investigated in any final EIS and mitigating measures must be provided.

What is the accuracy of the each field survey conducted and bird point counts? What is the margin of error? If accuracy cannot be guaranteed, a potential for environmental impacts to endangered terrestrial fauna exists. These impacts must be identified in any final EIS, and measures to mitigate these impacts must be included in any final EIS.

Are the “numerous canopy trees” in the Tern habitat enough to support the existing and future white tern population? What is the basis of the claim in the DEIS that the other large canopy trees in urban Honolulu will result in no impact to the white tern population? Please provide sources to substantiate this claim.

How were field surveys conducted? The DEIS explains the procedure for conducting point counts but not field surveys. Any final EIS must include the procedure followed for conducting field surveys.

Why was 8 minutes the duration used for point counts? Please provide a justification for the use of this time interval. One study found that on average 55% of all initial species detections occurred within the first 5 minutes, and 82% of all initial species detections occurred within the first 10 minutes, of 15-minute long point counts regardless of time of day or use of aural stimuli. If the results of this study hold true for Hawaii, only about a 75% of all species were detected over the 8-minute period. Were single or multiple visits conducted? Bartlet, et al. (1999) recommended two visits.

What time of day were point counts conducted and was any aural stimuli used

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The results of the Water Quality Impact Assessment for the EPA must be included in any final EIS and the public must have an opportunity to comment on this study.

What permanent BMPs will be implemented to ensure there is no change in the amount of infiltration? An increase in infiltration relative to existing conditions can have positive environmental impacts. Have any studies been conducted to determine if this is feasible?

The DEIS states that because the Project would rely on electric propulsion, minimal pollutants would be generated on the guideway relative to pollutants generated by roadway traffic. Has a study been conducted that confirms this assumption? If so, please provide a source.

The DEIS does not acknowledge the fact that floodplains provide ecological benefits beyond groundwater recharge and infiltration, including but not limited to maintenance of biodiversity and fish habitats. In fact, the DEIS states the contrary by saying "the only beneficial functions for the floodplains analyzed in the study corridor are the recharge of groundwater and drainage conveyance". Please provide evidence to support this claim.

It is my understanding that the foundations for the proposed structure are expected to be large diameter drilled shafts, in some cases very deep, on the order of hundreds of feet. The final EIS should present study on the effects of the drilling and installation of such foundations on the groundwater system. Also The large volume of earth moved to create the foundation needs to go somewhere, this impact should also be assessed in the final EIS.

The DEIS lists a number of ways the volume of hazardous materials used and extent of worker exposure *could* be limited as a means for mitigation. This list of mitigating measures *must* be implemented in order to adequately mitigate environmental impacts of hazardous waste.

Will this project be built to a LEED™ standard?

What measures will be taken to avoid corrosion?

If ridership turns out to be much lower than forecast, are fees going to be increased? Are taxes going to be raised? What is the forecast for number of riders per day (best estimate, range from low to high)?

Lanes will be taken away during construction. Where are the lane closures and what is the duration of closure? Are there traffic rerouting plans?

What is the amount of carbon dioxide emitted by rail per person-mile when at maximum capacity? How does this compare to a Prius (50 mpg) with a solo driver? What is the maximum capacity of the proposed rail system?

How much energy does rail use (in kwh) per person-mile when at maximum capacity? Again, how does this compare to a Prius (50 mpg) with a solo driver?

Where will the power come from to operate the rail system? Will HECO build a power plant to run the rail? If not, is there enough current base load capacity to operate rail?

Please send your responses to my comments to:

Aaron Erickson
1348 Alewa Drive
Honolulu, HI. 96817

Aloha,

A handwritten signature in black ink, appearing to read 'Aaron Erickson', with a long horizontal flourish extending to the right.

Aaron Erickson

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

RE: Honolulu High Capacity Transit Corridor Project Draft Environmental Impact Statement

Aloha Mr. Yoshioka:

OVERVIEW

To paraphrase the Draft Environmental Impact Statement (DEIS), The Honolulu Transit Project is destined to become the most visually dominant and intrusive construction project in the history of Hawai'i. While its ability to ease traffic problems on O'ahu has been the subject of lengthy debate, its negative impact on the visual environment of this island cannot be denied and is virtually immeasurable.

The Outdoor Circle's review finds that the project's DEIS fails to adequately describe the cumulative impacts of the project and how those impacts will be mitigated with respect to view planes, street trees, landscaping, utility lines and overall intrusiveness in our communities. Additionally we do not find the information provided about the alternatives to contain enough detail to make an informed assessment of the project.

Throughout the comments provided in this document, all material in quotes and underscored have been copied word-for-word from the DEIS.

VIEW PLANES and COMMUNITY INTRUSIONS

The Honolulu High-Capacity Transit Corridor Project will become the single most dominant man-made feature in the State of Hawai'i. It will intrude upon "the open and undeveloped character" of the Ewa Plain. It will block views of parks, and historic sites in Pearl City. In the airport district it will "obstruct the views of East Loch and the Pearl Harbor historic sites" for hundreds of homes. Please provide details as to how these impacts will be mitigated. In Kalihi the raised guideway will be the "dominant feature in the views along Dillingham Blvd." In Chinatown the proposed project "blocks makai views," and will be "out of character with the pedestrian oriented environment" in one of the most historic and sensitive

Mr. Wayne Yoshioka
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neighborhoods on the island. Again, no details are given as to how this will be mitigated. In order to analyze the full impacts of the project the EIS must provide specifics.

As it passes through the city's central business district, the guideway and the proposed Downtown Station will "be dominant features in the views along Nimitz Highway." It will "contrast substantially with the pedestrian character of the streetscape" and it will "substantially affect the visual setting of the Dillingham Transportation Building and Irwin Park." Finally it will "block makai views" from numerous residences. "Overall visual effects in this area would be high." As the project approaches historic structures such as the two listed above more consideration must be given to alleviating the negative impacts the guideway will have. Please provide more information.

As the guideway heads to Ala Moana Center there will be more "block(ed) views on the fourth and fifth floors of residences and offices" and will "increase light and glare on upper story residences." Throughout this part of the city the project will "block protected mauka-makai views of the Ko'olau and Waianae Mountains; the ocean and Honolulu Harbor and Diamond Head, Punchbowl and Aliamanu craters" "Overall the visual effects in these areas would be high." Once again we ask what efforts the city will undertake to lessen these impacts.

The assessments made in the DEIS are mostly based upon predicted impacts on people from fixed locations. Barely mentioned is the fact that the project also will have enduring, significant negative impacts on anyone who travels near it, whether a Windward or North Shore resident or one of the millions of people who visit our island every year.

The document contains broad promises of designing various elements to minimize negative visual effects. However, the lack of specific descriptions of how to overcome the visual impacts leaves our organization with little confidence that damages to the visual environment can or will be considered as the project moves forward. It is imperative that the EIS provide further explicit detail.

In addition, the document offers little in the way of alternatives. We believe that alternatives that have a lesser impact on the scenic environment should be studied and detailed. Only then can an informed decision be made.

STREET TREES

Of equal concern to The Outdoor Circle is the fate of literally hundreds of street trees. Honolulu has fostered a worldwide image of being a city full of beautiful trees. It is an important part of Honolulu's appeal to both residents and visitors. But the system's chosen alignment will result in the removal of more than 800 street trees. About one-half to two-thirds of those trees will be transplanted to unspecified "appropriate areas," but that leaves a possible deficit of more than 300 trees with no mitigation to the environment for the tree removals. For the sake of island aesthetics, pollution reduction, oxygen production, storm water reduction and ambient temperature moderation the city must revise its mitigation

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plans so that the result of the project is a net increase of three shade trees for every one tree removed. Also, the EIS must be species specific as to what will be replanted.

Further, The Outdoor Circle knows how difficult it is to find available tree planting sites in our city. We believe the EIS must provide specific sites for tree relocations now. The language in the draft document is too vague. Please address this issue.

Of great distress is the proposal to eliminate "notable" trees in two separate areas. The project calls for the removal of 19 beautiful Kamani trees on the mauka side of Dillingham Boulevard near Honolulu Community College. It proposes keeping the Kamanis on the makai side which already have been severely pruned by HECO contractors to keep them away from the power lines. The result of this pruning has left these important trees barely recognizable. We believe the EIS must require that the power lines be placed beneath the fixed guideway or placed underground to eliminate additional blight. We also believe that keeping the badly misshaped Kamani trees while removing the beautiful, completely healthy trees across the street is unacceptable. The EIS should provide for the guide way alignment to shift to the makai side of Dillingham where the already compromised Kamanis could be removed instead of the beautiful trees on the mauka side.

Additionally, we find it completely unconscionable that the City would remove 23 beautiful, fully mature Monkeypod trees from Kapiolani Boulevard in the area of University Avenue as is proposed for the future alignment to the University of Hawai'i. The Kapiolani Boulevard Monkey Pod trees are a community resource that must be preserved and protected as they currently exist. The City must rethink and adjust the transit alignment that would result in the removal of any of the Monkey Pod trees on Kapiolani Boulevard.

The DEIS briefly discusses how to mitigate the "substantial damage" to street trees. However the language is uncertain and unconvincing. It states that a contractor "would prepare new planting plans," and that additional trees "could be planted to offset this impact." The Outdoor Circle does not believe "would and could" are the kind of guarantees the people of Honolulu are looking for. The final EIS must specifically state how the City intends to fully, not partially, mitigate the loss to our urban forest.

TREE PROTECTION

The DEIS fails to present plans for protecting existing trees during construction. These include trees in close proximity to the project elements including all transit stations, the fixed guide way and all other infrastructure that will be constructed or installed as part of the project. This oversight could result in significant negative impacts to the trees, their canopies and/or roots resulting in the unintended damage or destruction of hundreds of trees. It is absolutely essential that the EIS include detailed tree protection plans that meet the standards of the International Society of Arboriculture (ISA). The plan also must state that all tree protection work will be supervised by qualified certified arborists who will be present during construction to ensure the integrity of the tree protection plan is maintained.

LANDSCAPING PLANS

The DEIS fails to specifically outline plans for mitigating the visual impacts of each of the transit stations as well as the large pillars that will support the fixed guide way for the entire length of the project. The Outdoor Circle believes the EIS must be much more specific in its landscaping plans in order to reduce the hard, physical presence of hundreds of support columns in every community along the planned alignment. These plans must include the planting of adequate greenery—trees and/or shrubs—to reduce the substantial visual impacts of the concrete supports.

Equally intrusive and in desperate need of specific landscaping plans are the more than two dozen transit stations that will rise above the fixed guide way and surrounding neighborhoods. These plans must be laid out in the EIS and their costs incorporated into the project budget. Landscaping must be included from the project's initial conception and not as an add-on after the fact.

SIGNS and ADVERTISING

Also not included in the DEIS is any mention of a commitment by the City to reject proposals that would allow signage in, around or on any part of the project—including all “transit oriented development” that may violate existing state or county sign laws. The EIS must address this issue fully. Also, there must be an absolute prohibition against any exterior commercial advertising on the train, the transit stations or any portion of the transit infrastructure such as its maps. The failure to address these concerns is an oversight that must be corrected to ensure that this project will not deviate from the long-standing protection of the visual environment against the scourge of inappropriate off-site advertising or excessive signage.

UTILITY LINES

We believe that this project offers a unique opportunity for the City and County of Honolulu and the wide range of O'ahu's utility providers to remove a long standing and persistent eyesore from the visual environment. One of the most intrusive elements that detract from the beauty of Hawai'i is the overbearing presence of utility poles and lines. The Outdoor Circle believes that relocating all utility lines along the transit route and placing them underground or along the under side of the fixed guide way will enhance the view planes. In addition, committing to this action will provide some mitigation for the visual damage created by the project. The visual burden of the fixed guide way and existing overhead utility lines is unacceptable. The EIS should discuss the effects of the utility poles and lines in detail and then provide information on the cumulative impacts of the lines with the fixed guide way.

FINAL OBSERVATIONS

The Outdoor Circle believes the City has substantially downplayed the visual impacts the project will have on our communities and our quality of life. Nor does the city offer acceptable mitigation throughout the DEIS for the damage this project will inflict.

Mr. Wayne Yoshioka
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We believe the city must acknowledge the negative impacts of the largest public works project in Hawai'i history and present sound plans in the EIS to mitigate the damage caused by the project. We strongly urge the City and County of Honolulu to carefully follow federal law in assessing the public's input and respond with changes, alternatives and mitigation that will reduce the long-term social and environmental impacts of the transit project.

In addition, The Outdoor Circle would like to be consulted going forward on the issues delineated in this letter and we would appreciate our organization's involvement being addressed in the document.

Thank you for the opportunity to comment. If you have any questions regarding these comments we would be happy to hear from you.

Sincerely,



Bob Loy
Director of Environmental Programs

cc: Office of Environmental Quality Control
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813

Federal Transit Administration
Region IX
201 Mission Street
Suite 1650
San Francisco, CA 94105-1839



SIERRA CLUB

O`ahu Group

P.O. Box 2577, Honolulu, HI 96803

tel: 808.537.9019

February 6, 2008

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

Mr. Brennon Morioka, Director
Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, Hawai'i 96813

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

Ms. Katherine Puana Kealoha, Director
Office of Environmental Quality Control
Department of Health
State of Hawai'i
235 South Beretania Street, Suite 702
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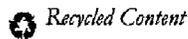
Honolulu High Capacity Transit Corridor Project Draft Environmental Impact Statement Comments

Aloha:

Thank you for the opportunity to comment. Sierra Club Oahu Group is in general favor of the proposed transit project, but offers the following questions and comments that we feel would strengthen the EIS and, ultimately, provide a better project for Oahu's citizens.

Connectivity

The figures in Chapter 2 do a nice job of illustrating station layouts and entry points. The City and County need to provide maps that illustrate how people get to those entrances. These maps should consider a radius of ½-mile from the station. They should clearly indicate sidewalk



and bikelane connectivity to the stations. Infrastructure improvements to provide this connectivity should be part of the project, or at the very least a high priority of the City and County. The City and County has a mandate to improve walkability and bikeability in the city. Providing good connections to this transit system would go a long way to achieving that.

Will bikes, surfboards and luggage be allowed on the train? Will there be any restrictions on time of day (i.e. not allowed during commute hours)? What is the size limitation?

What pedestrian and bicycle amenities will be designed and built in or near transit stations?

Aesthetics and Viewplanes

The DEIS provides a thorough discussion on the visual impacts of the project, but provides little in the way of mitigating measures. Many other states utilize attractive concrete art to soften the impact of large highway structures. In addition to softening the visual impact, this strategy also appears to greatly inhibit graffiti. Walls in Arizona and Colorado are effective. In many locales, local artists design motifs that are incorporated in concrete surfaces. See the following link for examples: http://www.concretenetwork.com/anne_balogh/concrete_walls.htm

Why is the entire transit route elevated? Where geography permits, the transit route should be placed at ground level to reduce cost of construction, energy consumption during construction, and impacts to view planes.

Agricultural land

Prime, unique, and statewide important lands are, by definition, of agricultural importance. Land with such classification is significant, not negligible, regardless of acreage. To trivialize the conversion of such lands on the grounds that only a small amount of it will be sacrificed is not acceptable. Conversion of such lands is, according to the ALISH system that defines these classifications, irreversible and therefore not a decision that should be taken lightly or trivialized because of scale.

Once the rail transit route is in place, it is expected that development will occur along the route, and this Transit-Oriented Development will almost certainly affect important agricultural lands. In order for the final EIS for rail transit to accurately and completely examine the environmental impacts to agricultural lands, the project must include agricultural lands adjacent to project construction boundaries. The Final EIS should include a detailed discussion and mitigation plan for negative environmental impacts to agricultural land affected by this project including an analysis of alternative routes to preserve prime, unique, and/or statewide important agricultural land. If these agricultural lands are part of a planned development corridor, the EIS should describe how City and County planning and zoning measures assure that important agricultural lands outside the planned development corridor are preserved.

The transit system should have a terminus in Waipahu, rather than East Kapolei, and extend into Waikiki and/or up to UH Mānoa instead of extending to East Kapolei where the majority of agricultural lands exist.

Air Quality

According to the DEIS, the methodology for projecting future air quality as a result of the various project alternatives is based on anticipated vehicle miles traveled (VMT) and average network speed for each alternative. The data given in the DEIS indicates that all Build Alternatives yield better air quality than the No Build alternative, which may not be true. Better air quality would only occur if the proposed rail transit system replaces enough cars on the road such that its emissions are less than the collective emissions of the cars it replaces. The EIS should discuss the possibility that the offset may not occur, and discuss measures of mitigation.

Energy

The Project should make every effort to maximize operating efficiency. The final EIS should also give more consideration as to the feasibility of integrating alternative energy technologies into the project as well as an analysis of potential energy conservation measures such as opting to build sections of the route at ground level rather than elevated where feasible.

What are the plans (if any) to run rail on renewable sources of energy (palm oil not included)?

What assumptions regarding ridership, VMT, etc. were made in determining the energy savings of each Build Alternative relative to the No Build Alternative?

Errors

Margins of error for all data, as well as a list of assumptions made, should be provided for clarity.

Cost

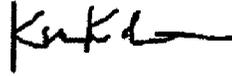
Will fares be subsidized to encourage ridership? If so, what is the target group for those subsidized fares?

What percent of the cost of rail (construction, maintenance and interest paid on bonds) is expected to be paid with fares? What if fares do not meet this percentage? Will fares and/or taxes be raised? By how much?

Please send comment responses to:

Sierra Club, O`ahu Group
ATTN: Randy Ching
1040 Richards St., Room 306
Honolulu, HI 96813

Sincerely,

A handwritten signature in black ink, appearing to read 'Kim Kido', with a stylized flourish at the end.

Kim Kido
On behalf of the Sierra Club, O`ahu Group



February 6, 2009

Department of Transportation Services
650 South King Street, Third Floor
Honolulu, Hawaii 96813

**Re: Honolulu High-Capacity Transit Corridor Project
City & County of Honolulu, Oahu**

Thank you for the opportunity to comment on the draft environmental impact statement prepared for the above-referenced project. The following comments were received from the our Engineering and Power Supply Departments:

- (1) Engineering/Project Management (Earlynne Oshiro, 543-7825). Numerous existing and planned HECO overhead and underground facilities will be affected by the project location and route. HECO will need continued access to our facilities for operation and maintenance purposes.
- (2) Engineering/Substation, Protection & Telecommunications (David Arakaki, 543-7593). Transit facilities in the area of HECO's Iwilei 138 kV Substation may conflict with possible expansion plans for the substation.
- (3) Power Supply/Power Plant Engineering (Michael Yuen, 543-7998).
 - (a) **Honolulu Power Plant**. The transit project proposes to use the Nimitz-Bishop corner of the Honolulu Power Plant for part of the transit station. This corner of the Honolulu Power Plant currently has a storage tank that provides propane for power plant operations. Area is limited at the Honolulu Power Plant, especially during major maintenance periods, so relocation of this tank and loss of the usable area would negatively impact HECO's operation and maintenance activities. HECO requests revision of the station design to avoid the use of the Honolulu Power Plant property.
 - (b) **Waiau Power Plant**. The proposed transit guideway is routed on Kamehameha Highway in front of the Waiau Power Plant. The plans presented to HECO last year proposed to eliminate the left turn into Kamehameha Highway coming out of the power plant because of guideway column placements. This turn is utilized by large Transmission and Distribution vehicles heading in the Ewa direction. These vehicles can not easily make U-turns so they would have to take a very circuitous route to head back toward the Ewa direction. HECO requests that the guideway column placement be relocated to avoid elimination of this turn.

- (4) Engineering/Project Management (Rouen Liu, 543-7245). Please note that HECO's work and associated costs related to the transit project may be subject to approval by the Public Utilities Commission, State of Hawaii. For this and other planning reasons, HECO would prefer to coordinate and plan for electrical needs or relocations as soon as practical.

We appreciate your efforts to keep us apprised of the planning process. As the project progresses, please continue to keep us informed. We will be better able to evaluate any effects on our system facilities further along in the project's development. We request that development plans show all affected HECO facilities, and address any conflicts between the proposed plans and HECO's existing facilities. Please forward the pre-final development plans to HECO for review.

Should it become necessary to relocate HECO's facilities, please immediately submit a request in writing and we will work with you so that construction of the project may proceed as smoothly as possible. Please note that there may be costs associated with any relocation work, and that such costs may be borne by the requestor. Because any redesign or relocation of HECO's facilities may cause lengthy delays, upon determination that HECO facilities will need to be relocated, HECO should be notified immediately in order to minimize any delays in or impacts on the project schedule.

To coordinate HECO's continuing input in this project, I suggest dealing directly with the points of contact noted above. Thank you again for the opportunity to comment.

Sincerely,



Kirk S. Tomita
Senior Environmental Scientist

cc: Ms. Katherine P. Kealoha (OEQC)
E. Oshiro
D. Arakaki
M. Yuen
R. Liu



February 3, 2009

Mr. Ted Matley
FTA Region IX
201 Mission St., Ste. 1650
San Francisco, CA 94105

Mr. Wayne Yoshioka
Department of Transportation Services
City and County of Honolulu
650 So. King St., 3rd Floor
Honolulu, HI 96813

Subject: Honolulu High Capacity Transit Corridor Project
City and County of Honolulu
Draft Environmental Impact Statement/4(f) Evaluation
November 2008

Dear Messrs. Matley and Yoshioka:

As long time residents of the Ala Moana-Sheridan neighborhood, we read with interest the Draft EIS for Honolulu's High Capacity Transit project dated November 2008.

We participated in the City and County of Honolulu's preparation of the draft Sheridan community plan in 2006, and appreciated how the vision is consistent with the City and County of Honolulu's Primary Urban Center Development Plan's designation of the Sheridan and Kaheka neighborhoods as In-Town Residential Neighborhoods. In Ala Moana-Sheridan, over 20% of the population is over 65 years old, and the proportion of elderly is steadily increasing (Draft Ala Moana-Sheridan Community Plan, 2006)." In light of this fact, the 2006 draft Plan discusses how public roads and facilities in and around our neighborhood need to be more pedestrian friendly to the elderly, general pedestrians and bicyclists. Therefore, we reviewed the Transit DEIS for a description and analysis of how access to the Transit Corridor Project would be pedestrian friendly for the Ala-Moana-Sheridan neighborhoods.

Instead, we found the Transit Corridor Project DEIS to be heading in the opposite direction making the area more congested with traffic and in turn creating a more rushed environment. The DEIS directly comments that the proposed TOD in the area will change the feel of the area, presumably making it more urban, "Because Kaka'ako has been designated a redevelopment area, changes in land uses to TOD is likely, which may result in a change in character along the alignment, especially near stations...(DEIS, p. 4-45). While we understand change is inevitable, the Transit DEIS does not even discuss basic project features such as access to the Ala Moana transit station for the affected neighborhood. Since safe and secure pedestrian access to and from the Ala Moana transit station is not discussed or analyzed in the Transit DEIS, we assume no design studies or even serious consideration has been devoted to this, the City and County of Honolulu's major public infrastructure project.

Please revise and expand the Transit DEIS to include detailed descriptions and analyses of the range of pedestrian and bicycle access ways to and from the Ala Moana station. If no consideration has yet been devoted to this project element for the Ala Moana-Sheridan community, we submit the DEIS is deficient and is not yet a complete Draft EIS.

Sincerely, *Doris Nakamura*

Doris Nakamura, 650 Sheridan Street PH, Honolulu, HI 96814

Y. Murata, 1224 KAMAILE ST. 96814
(address)

[Signature], _____ (address) 705 PIKOI ST 96814

[Signature], _____ (address) 740 SHERRILL ST 96814

[Signature], _____ (address) 650 Sheridan St 96814

cc: Councilmember Duke Bainum, District 5
Senator Carol Fukunaga, District 11
Representative Tom Brower, District 23
Congressmember Neil Abercrombie
Rep. Karl Rhoads, District 28

LINDA LINGLE
GOVERNOR
STATE OF HAWAII



MICHAEL KANE
CHAIRMAN
HAWAIIAN HOMES COMMISSION

KALANA H. PARK
DEPUTY TO THE CHAIRMAN

ROBERT J. HALL
EXECUTIVE ASSISTANT

STATE OF HAWAII
DEPARTMENT OF HAWAIIAN HOME LANDS

P.O. BOX 1879
HONOLULU, HAWAII 96805

February 6, 2009

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

Dear Mr. Yoshioka:

Subject: Comments on the Draft Environmental Impact Statement (DEIS) for the Honolulu High-Capacity Transit Corridor (HHCTC) Project

Mahalo for the opportunity to provide comments on the subject DEIS and for extending the public review period on this important project.

As stated in the DEIS, the Department of Hawaiian Home Lands (DHHL) has several new development projects in East Kapolei that would be impacted by the proposed HHCTC project. We have reviewed the document and provide the following comments.

Over the past few years DHHL has expedited the number of homestead awards to qualified native Hawaiians and have focused on ensuring that new and existing homesteads are livable and complete communities. DHHL seeks to enhance the quality of life for all its beneficiaries and to ensure that they not only have adequate shelter, but their homes are energy efficient, well served by schools, internet ready, transit ready, and pedestrian oriented. Our goal is to provide live, work, play and educational opportunities within our communities.

Kapolei/Ewa is the fastest growing region in the State of Hawai'i. There are several public and private investments driving the growth of this secondary urban center on O'ahu. Major road and utility infrastructure projects, a University of Hawai'i West O'ahu campus (UHWO), major residential clusters, and nodes of commercial development are amongst the investments being supported as the region continues to develop.

AR00058016

DHHL's Kapolei lands are in the middle of this prospering secondary urban center. The investments in infrastructure, employment, education, recreation, housing and commercial projects have contributed to a holistic community. These developments are leading to the actualization of Kapolei as O'ahu's Secondary Urban Center, and not just a bedroom suburb of Honolulu. Since many of DHHL's lands elsewhere in the State are located in rural or remote areas, there are few places better for DHHL to have a greater impact on meeting the needs of its beneficiaries than in Kapolei.

DHHL's East Kapolei 1 and 2 projects represent DHHL's ideal master plan community development efforts. DHHL's primary goal is to provide thriving communities where people can:

- Live (proposed single-family and multi-family residences within East Kapolei 1 and 2),
- Work (Ka Makana Ali'i regional shopping complex),
- Play (the proposed Kroc Center),
- Learn (UHWO campus, and proposed elementary and middle school sites in DHHL East Kapolei 2), and
- Shop (Ka Makana Ali'i regional shopping complex).

Additionally, DHHL has lands within Kalaeloa that would probably be best suited for industrial or industrial mixed-use development, with the potential for providing more work opportunities for its beneficiaries residing in Ewa and Waianae.

Approximately 2,650 new housing units are planned for DHHL East Kapolei 1 and 2 projects along with the headquarters for DHHL, open parks, and a preschool. Also planned for DHHL's East Kapolei 1 and 2 projects are public and community services including the Kroc Center, a new fire station site, spaces for Hawaiian organizations and a Hawaiian Homestead Heritage Center. Some of the housing will be developed by the State of Hawaii's Housing Finance and Development Corporation (HHFDC). Thus, the proposed developments on DHHL East Kapolei 1 and 2 projects will not only benefit DHHL's beneficiaries but all residents as well.

The DHHL East Kapolei 1 and 2 parcels are further surrounded and supported by other work, live, play and learn opportunities. The UHWO campus will be located immediately mauka of the East Kapolei 1 parcel providing learning opportunities (including a State Department of Education elementary school site). Recreational opportunities will be provided at proposed park sites and at the Kroc Center, which is situated within walking distance of most of the residential units in DHHL East Kapolei 2. A 1.5 million square foot regional mall is planned in the commercial parcel of DHHL East Kapolei I ("Ka Makana Ali'i regional shopping complex").

When finished, the UHWO campus is expected to have roughly 743,000 gross square feet of building space with room for expansion that could accommodate 7,600 students and 1,000 faculty and staff. DHHL supports the plans of the University of Hawai'i – West O'ahu campus to locate in East Kapolei. The proposed campus also attracts housing and commercial developments and provides opportunities to create communities where one can live, work, play, and learn.

Additionally, Kapolei's tremendous growth creates a critical mass that will attract new employment opportunities, as well as transit ridership. The UHWO campus, Kroc Center, and the planned Ka Makana Ali'i regional shopping complex on DHHL land, and other commercial and retail projects will provide future employment so that Kapolei/Ewa residents will not be forced to commute to Honolulu and Waikiki. **For this reason, DHHL is supportive of the proposed phasing of the HHCTC project to start construction between Kapolei and Waipahu.**

Our detailed comments on the DEIS follow:

On page 2-24, the key components of each transit are described in a "sidebar." We note that there is no mention of public restrooms (even automated public toilets) or what form of security will be provided (including security cameras). We would think that both types of facilities are necessary for old, young and otherwise. The impacts of including or not including such facilities should be directly addressed in the Final EIS (FEIS).

Vehicle Maintenance and Storage Facility – On page 2-38 of the DEIS, it is noted that one potential location for the required Vehicle Maintenance and Storage Facility would be located on a 43-acre site makai of Farrington Highway between Waipahu High School and Leeward Community College. While we concur that this site would allow for an efficient transit "system operation because it is more centrally located and vehicles could enter and exit the fixed guideway in either direction...", the loss of 43 acres of centrally located land will have a significant negative impact to DHHL's goals of providing either housing and/or economic benefits to its beneficiaries. This site is centrally located to H-1 and H-2 and would be ideal for warehousing operations for larger retailers. Located between two educational facilities, this site is also ideal for families with school-aged children or for adults interested in changing careers or life-long learning.

We believe that if the City and County of Honolulu would be willing to exchange Varona Village for the proposed Vehicle Maintenance and Storage Facility near Leeward Community College, this would help to mitigate the impacts of losing the

latter site. The Hawaiian Homes Commission Act requires that land exchanges be of equal value.

On Figure 2-14 (page 2-25), the location of the "Proposed Park-and-Ride Lot" for the East Kapolei Station is shown but what is not shown is how commuters will access the parking lot. We would, of course, be concerned about late commuters speeding through the DHHL East Kapolei 1 project to access the "Proposed Park-and-Ride Lot" for the East Kapolei Station, endangering our beneficiaries and their children commuting to a proposed DOE elementary school in the UH West O'ahu site.

On page 3-53, in the "sidebar" entitled "Summary of Findings: Transportation Conditions and Effects," we note that under the category of "Effects of the Build Alternatives," there is no mention of the traffic impacts from cars generated from the "Proposed Park-and-Ride Lots" on streets immediately surrounding such facilities.

Table 4-1, Page 4-5, "Acquisitions, Displacements, and Relocations (Section 4.3)" - The land under the selected Vehicle Maintenance and Storage Facility site would eliminate either landowner's opportunities for development of their respective sites. This should be included in Table 4-1 or elsewhere in the FEIS.

Page 4-28, Figure 4-9 - While Figure 4-3 indicates the "Future Campus of UH West O'ahu" and the "Future Salvation Army Kroc Center," Figure 4-9 does not show these important community resources and facilities, even though they are currently not in operation (but will be by the time the transit stations are built). Figure 4-9 should be revised accordingly.

Page 4-171, Table 4-36 - There is no mention of DHHL's East Kapolei 1 (between UH West O'ahu, North-South Road, Kapolei Parkway and Kapolei Golf Course) and East Kapolei 2 (between Hoopili, North-South Road and Ewa Villages) projects. Table 4-36 should be revised accordingly.

With the electorate voted in favor of proceeding with the HHCTC project this past November, DHHL wishes to express its support for the HHCTC Project, but wants to ensure that the project is done "right." We believe that the HHCTC project will increase its beneficiaries' accessibility to jobs, schools, shopping and recreational opportunities, without having to own a second car.

DHHL wants to be on record that it supports the extension of the HHCTC west towards the City of Kapolei as long as there is a transit station (identified as Kapolei Parkway Station on Figure 2-5 of the DEIS) located at DHHL's Ka Makana Ali'i regional shopping complex.

Mr. Wayne Y. Yoshioka
February 6, 2009
Page 5

We appreciate the opportunity to provide comments on the Draft EIS. Should you have any questions regarding this matter please feel free to contact Darrell Yagodich from our Planning Office at 620-9481.

Aloha and mahalo

A handwritten signature in black ink, appearing to read "Micah", with a long horizontal stroke extending to the right.

Micah A. Kane, Chairman
Hawaiian Homes Commission



MAKIKI/ LOWER PUNCHBOWL/ TANTALUS NEIGHBORHOOD BOARD NO. 1

c/o NEIGHBORHOOD COMMISSION • 530 SOUTH KING STREET ROOM 406 • HONOLULU, HAWAII, 96813
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February 6, 2009

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

Dear Mr. Yoshioka,

The Makiki Lower Punchbowl Tantalus Neighborhood Board No. 10 requests a Supplementary EIS (SEIS) to answer the following questions:

1. The DEIS does not answer how the rail effect the individual bus routes on the island. We are especially interested in bus routes 4, 17 and 18 and the buses along Beretania and King Streets. What will the existing routes throughout the island in the year 2020.
2. The latest population was not used in the DEIS that can out in January, 2008 from DBEDT which reduces the population figures that was used in the DEIS. The SEIS would have to show changes in the ridership and employment figures.
3. Although we have been in recession from December, 2007, the DEIS does not reflect that fact. Since this project will extend from 2009 to 2018, the SEIS should consider this recession effects with possible alternatives in financing and construction.
4. We are very concern that the project cost plus the contingency allocation does not take in consideration of this recession. This should be discussed in the SEIS.

Thank you for consideration.

Sincerely,

Charles Carole
Vice Chair

CC: Ted Matley, FTA Region IX



Oahu's Neighborhood Board system – Established 1973

AR00058021

February 6, 2009.

Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813
808-768-8303
Email: wyoshioka@honolulu.gov

Dear Mr. Yoshioka:

Comments on the Honolulu Draft Environmental Impact Statement (Draft EIS)

Our comments on the Draft EIS are attached in seven parts:

- [Part I All reasonable alternatives were not studied.](#)
- [Part II Insufficient consideration of elevated rail impacts.](#)
- [Part III The Locally Preferred Alternative must be studied in the EIS.](#)
- [Part IV First Project, Phase I, is an illegal segmentation.](#)
- [Part V Unjustifiable forecasts.](#)
- [Part VI Strategic misrepresentation in the Draft EIS.](#)
- [Part VII Strategic misrepresentation outside of the Draft EIS.](#)

We find the Draft EIS continues, as did its forerunners, the Oahu Regional Transportation Plan and the Alternatives Analysis, to mislead the public with unclear language, misrepresentations, and omissions of important material so as to position this document as less of an analytical and informative document and more of a selling tool.

Hopefully you will produce a Supplementary Draft EIS that will remedy these misrepresentations, omissions, and unclear language so that it will be clear to the public that,

- You are forecasting traffic congestion to be worse in the future with rail than it is today.
- An elevated rail line traversing the core of our city will have a deleterious effect on our environment.
- There exists a high risk of property taxes being greatly increased to fund the increased operating subsidies and the missed construction cost forecasts.
- The project places undue risks on an already fragile economy.

We find that the City has taken an insufficiently “hard look” at the alternatives that were rejected, at those issues we have discussed herein as misrepresentations in the Draft EIS, and the ridership forecasts, as examples. They are supposed to be dealt with in detail. As one court held,

*... assumptions must be spelled out, inconsistencies explained, methodologies disclosed, contradictory evidence rebutted, record references solidly grounded, guesswork eliminated and conclusions supported in a manner capable of judicial understanding.*¹

We find that the City and Parsons Brinckerhoff have not produced a document that has handled these important environmental issues with the objectivity and scientific rigor that is both needed by the public and is a NEPA requirement.

¹ E. I. DuPont de Nemours & Co. v. Train, 541 F.2d 1018, 1038 (4th Cir. 1976).

In summary, we believe the alternatives analysis is legally insufficient since the Managed Lanes Alternative analysis is so lacking in factual substance that it must fail to give the reader the true meaning of the alternative. Failing to provide accurate and complete information, especially for one of the most important socioeconomic factors — the incredibly high cost to Hawaii's citizens — makes this a faulty document that must be redone.

When the analysis fails to describe the incredibly low cost of the Tampa project when compared to the projected Hawaii costs, one cannot help to wonder why this fact was left out. Socioeconomics has been given very little if any attention in this document and failure to point out the Tampa project was approximately seven times cheaper than this proposed action is problematic and thus the underlying analysis fails.

The people of Hawaii were not given this information and if they were given this information, perhaps the vote may have gone differently. If they had been given this information in this NEPA document, perhaps they would have had more meaningful comments on the proposed action. We will not know unless a new Draft EIS is produced.

The Draft EIS is also simply not readable and thus doesn't give the opportunity for the reader to make meaningful comments. It incorporates by reference 20 studies and the Draft EIS fails to weave a narrative that accurately describes in the NEPA document, as required by NEPA, the true potential impacts that will be caused by the proposed action.

In a less complicated project, perhaps this would be acceptable; but in a proposed \$5 billion project that will displace hundreds of people, condemn homes and businesses, disrupt traffic and Oahu's quality of life, disturb cultural resources, potentially uncover sacred *iwi*, cause financial hardship to hundreds of thousands of people, while disregarding reasonable alternatives, or leaving out key components of other alternatives, is completely unacceptable.

The City and County and the FTA must be held to the standard required by the 9th Circuit, NEPA, and Hawaii State law, and the information presented fails to meet these standards. We request that a Supplemental Draft EIS be undertaken.

Sincerely,
HONOLULUTRAFFIC.COM



Cliff Slater
Chair

CDS/trs

cc: Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105
Email: ted.matley@fta.dot.gov.

February 6, 2009

Part I — “All reasonable alternatives” were not studied.

“There's small choice in rotten apples.”

This line from Shakespeare's *The Taming of the Shrew* is, appropriately, the opening line in the FTA's introduction to *Evaluation of the Alternatives*.¹

We believe that insufficient alternatives were considered during the Alternatives Analysis. Each prior rail transit effort in Honolulu from the 1970s on has suffered from the same problem; the range of alternatives studied was inadequate and disinterested experts have all commented on it.

Finally, the most serious deficiency of analyses done to date is the failure to devise and evaluate meaningful alternatives to HART [Honolulu Area Rapid Transit]. The so-called "alternatives analysis" is seriously deficient and the bus alternative considered in them can only be considered as "straw men."

*Dr. John Kain, Chair, Economics Department, Harvard. 1978.*²

In particular, what is lacking is a serious investigation of several viable dedicated busway options.

*Dr. Robert Cervero, Professor of Urban and Regional Planning, UC-Berkeley. 1991.*³

Many more examples in a similar vein are available from experts' critiques of the 1990 Alternatives Analysis.⁴

The National Environmental Policy Act (NEPA) process requires that the City & County of Honolulu (City),

*Rigorously explore and objectively evaluate all reasonable alternatives ... Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits ... Include reasonable alternatives not within the jurisdiction of the [City].*⁵

The Council on Environmental Quality's (CEQ) comments on 1502.14 is as follows:

*Section 1502.14 requires the EIS to examine all reasonable alternatives to the proposal. In determining the scope of alternatives to be considered, the emphasis is on what is "reasonable" rather than on whether the proponent or applicant likes or is itself capable of carrying out a particular alternative. Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.*⁶ (emphasis added)

¹ http://www.fta.dot.gov/documents/Evaluation_of_Alternatives.pdf

² Seminar on Urban Mass Transit (transcript). Office of the Legislative Auditor, State of Hawaii. January 1978.

³ Quoted from “An Evaluation of the Honolulu Rapid Transit Development Project's Alternative Analysis and Draft Environmental Impact Statement.” Hawaii Office of State Planning and University of Hawaii, May 1990. Robert Cervero, Professor of Urban and Regional Planning at the University of California, Berkeley, and a member of the Editorial Board, Journal of the American Planning Association.

⁴ [An Evaluation of the Honolulu Rapid Transit Development Project's Alternative Analysis and Draft Environmental Impact Statement, Hawaii Office of State Planning and University of Hawaii, May 1990](#). Available at the Honolulu Municipal Library.

⁵ [40CFR1502.14](#)

⁶ Question 2A in CEQs 40 Q&As. <http://www.mnrg.gov/meetings/2005cimpacts/pdfs/40Questions.pdf>

In addition to rail transit and No-Build, there are at least three other alternatives that should have been considered in the Draft EIS:

1. The Reversible Managed Lane Alternative
2. The 2003 Bus/Rapid Transit Project
3. The EZway plan.

1. The Reversible Managed Lane Alternative.

The draft EIS shall evaluate all reasonable alternatives to the action and discuss the reasons why other alternatives, which may have been considered, were eliminated from detailed study. (23CFR771.123)

The reasons given for the elimination of the Managed Lane Alternative from the Draft EIS are insufficient since little supporting data is given for the conclusions reached and no reference is given to any other publication that might have it. It is not surprising since there was little in the Alternatives Analysis or in the documents regarding the second Scoping when we first found that the Managed Lane Alternative had been eliminated.

For example, the Draft EIS tells us “*that the Managed Lane Alternative would provide slightly more benefit [than TSM] at a substantial cost.*” We can only guess at what that means.

A Bus/Rapid Transit (BRT) bus would travel at 55mph while on the Managed Lanes and, say, 15 mph when on city streets. If the distance traveled on city streets is one-half of that traveled on the Managed Lanes the average speed would be 29 mph — faster than trains. But the benefit to users of trains is supposedly three times that of the Bus/Rapid Transit on Managed Lanes?

Also two, or possibly three, additional lanes managed through dynamic pricing would each have a vehicle throughput close to twice that of each of the nearby congested freeway lanes according to the Federal Highways Administration (FHWA).⁷ Such lanes would add the equivalent of four to six lanes to the current (and projected through 2030) five regular freeway lanes. And we are supposed to believe that traffic congestion⁸ will be far worse with Managed Lanes? There is no support for this in the Draft EIS nor any reference to other documents.

We made the original proposal for a reversible dynamically-tolled highway which led to its inclusion in the First Scoping authorized in the federal Notice of Intent of December 5, 2005.

The concept that we proposed to the City was what Reason Foundation’s Robert Poole, termed a *Virtual Exclusive Busway* where buses and vanpools have priority and go free of toll charges and all others pay a dynamically-priced toll. It has all the virtues of an exclusive busway, while also having a significant impact on automobile traffic congestion in the Corridor.

The City’s Chief Transportation Planner said that he used the map of our proposed route from our website and that, “*This is what HONOLULUTRAFFIC.COM requested us to study and this is exactly what we studied.*”⁹

However, our original proposal was only a conceptual one; at the time we did not have the technical expertise to do anything else and we certainly did not have the resources to submit a comprehensive design. Far from being a design, a cursory look at our original map shows a freehand line drawn none too steadily along the route with a black marker pen. It never crossed our minds that Parsons Brinckerhoff would not apply its expertise to provide the best possible alternative.

⁷ FHWA’s *Congestion Pricing — A Primer*. At: <http://www.honolulutraffic.com/congestionpricing.pdf> p. 3.

⁸ See Vehicle Hours of Delay in Table 2-1, Draft EIS.

⁹ League of Women Voters Forum video, <http://www.brightcove.tv/title.jsp?title=1301088850&channel=293897125> 5:00 minute mark of 10 minute video.

We had forecast a cost of \$900 million for a 10-mile two-lane version. This estimate of cost came from a one-day conference that Governor Lingle asked us to conduct in December 2002 to evaluate whether the reversible tolled transitway concept was worth pursuing. Some of Hawaii's and the nation's leading experts¹⁰ on this issue were represented at the conference. The concept and cost estimates met with the general approval of the attendees and accordingly we recommended to the Governor that the project be further developed to a higher level of detail.

In December 2005, the FTA issued the first Notice of Intent and it stated,

Alternatives proposed to be considered in the AA [Alternatives Analysis] and draft EIS include No Build, Transportation System Management, Managed Lanes, and Fixed Guideway Transit.

After the first Scoping, the Scoping Report of April 6, 2006¹¹ issued and confirmed that the Managed Lane Alternative would be studied in both the Alternatives Analysis and the Draft EIS.

Subsequently, the Alternatives Analysis was produced in November 2006 and recommended that the Fixed Guideway Alternative be adopted as the Locally Preferred Alternative and shortly thereafter the City Council chose the Fixed Guideway Alternative with termini at West Kapolei, University of Hawaii at Manoa and Waikiki.

However, the Managed Lane Alternative was not objectively studied in the Alternatives Analysis. Rather, the Managed Lane Alternative was setup as a classic "straw man," contrived to make it look ineffective in comparison to rail transit.

Professor John Kain, co-author of the classic *The Urban Transportation Problem*, who wrote extensively about such tactics, wrote in his *The Use of Straw Men in the Economic Evaluation of Rail Transport Projects*,¹²

Nearly all, if not all, assessments of rail transit systems have used costly and poorly designed all-bus alternatives to make the proposed rail systems appear better than they are.

Out of the blue, on March 15, 2007, the FTA issued a second Notice of Intent¹³ but this time excluded the Managed Lane Alternative. This was the first intimation we had of its rejection. Both the first Notice of Intent¹⁴ and the first Scoping Report¹⁵ had stated that the Managed Lane Alternative would be studied in the Draft EIS.

Mr. David Glater, then the recently retired Chief Counsel of the US DOT's Volpe Center, who had been appointed to be the Transportation Analyst for the City Council's Transit Advisory Task Force, and who wrote the Task Force Report, must have also been surprised since his Appendix 3, attached hereto as Appendix B, is titled, "*Suggestions for further development of the Managed Lane Alternative.*"

¹⁰ In attendance: Mike Schneider, Executive Vice President of PB Consult, Mel Miyamoto, Vice President, Heavy Construction, Dillingham Corporation, Roger Morton, General Manager of OTS Inc, operators of the City's bus system, Bruce Turner, Assistant Division Administrator, Hawaii Division FHWA, Robert Poole, Director of Transportation Studies, Reason Foundation, Glenn Yasui, Highways Division, Hawaii Dept. of Transportation (Hawaii DOT). By phone: Patrick DeCorla-Souza, AICP, Team Leader, Highway Pricing and System Analysis, Office of Transportation Policy Studies FHWA, C. Kenneth Orski., Urban Mobility Corporation, consultant and publishers of *Innovation Briefs*.

¹¹ <http://www.honolulutraffic.com/ScopingReport.pdf>

¹² Kain, John F. *The Use of Straw Men in the Economic Evaluation of Rail Transport Projects*. American Economic Review, Vol. 82, No. 2, Papers and Proceedings of the Hundred and Fourth Annual Meeting of the American Economic Association (May, 1992), pp. 487-493. At: <http://www.honolulutraffic.com/kainrail.pdf>

¹³ www.honolulutraffic.com/NOI0307.pdf

¹⁴ www.honolulutraffic.com/NOI051205.pdf

¹⁵ <http://www.honolulutraffic.com/ScopingReport.pdf>

The second Notice of Intent did not even want comments on alternatives that were “*previously studied and eliminated for good cause.*” While not named, one can reasonably assume it referred to the Managed Lane Alternative.

On March 18, 2007, we wrote to the FTA protesting that the process used by the City for assessing the Managed Lane Alternative in the Alternatives Analysis was flawed.¹⁶ We also protested the issuance of two Notices of Intent to perform the same Draft EIS. We received no response to these communications.

Honolulu found itself in the strange position of beginning Scoping while having already selected its Locally Preferred Alternative.

The second Scoping Report that issued May 30, 2007¹⁷ implies that the Managed Lane Alternative was rejected at least in part because,

The Honolulu High-Capacity Transit Corridor Project analysis is meant to evaluate project alternatives that may be constructed within the authorization of Act 247, enacted by the Hawai‘i State Legislature in 2005. The act prohibits the construction of a non-transit project with the authorized excise-tax surcharge. Projects with the purpose of providing roadway mobility for automobiles and commercial vehicles are not fundable by Act 247; therefore, they will not be added to the purpose of the Honolulu High-Capacity Transit Corridor Project¹⁸.

However, this is the first mention of Act 247 through two Notices of Intent and two SIPs and the first Scoping Report. In any case, is this reason for rejection not in conflict with the following?

An alternative that is outside the legal jurisdiction of the lead agency must still be analyzed in the EIS if it is reasonable. A potential conflict with local or federal law does not necessarily render an alternative unreasonable, although such conflicts must be considered. Section 1506.2(d). Alternatives that are outside the scope of what Congress has approved or funded must still be evaluated in the EIS if they are reasonable, because the EIS may serve as the basis for modifying the Congressional approval or funding in light of NEPA's goals and policies.¹⁹

The second Scoping Information Package describes the Fixed Guideway Alternative as follows:

The fixed guideway system is planned to operate between 4 a.m. and midnight, with a train arriving in each direction at each station between every three and ten minutes ... The system is planned to operate with multicar trains approximately 175 to 200 feet in length, with each train capable of carrying a minimum of 300 passengers. This would provide a peak capacity of at least 6,000 passengers per hour per direction.²⁰

Since at this point the *de facto* decision to select trains as the preferred mode alternative had already been made, does not the issuance of a new Notice of Intent circumvent the requirement that NEPA *not be used to rationalize or justify decisions already made?*²¹

The second Scoping Report states,

As stated in the Notice of Intent issued on March 15, 2007, that Notice of Intent superseded [sic] the one published on December 5, 2005.²²

¹⁶ www.honolulutraffic.com/AAMLcomments5.pdf

¹⁷ <http://www.honolulutraffic.com/NEPAScopingReport.pdf>

¹⁸ The second Scoping Report, p. 5-1. Act 247 is at

¹⁹ <http://www.nepa.gov/nepa/regs/40/1-10.HTM#2>

²⁰ Scoping Information Package. 4-1&2. <http://www.honolulutraffic.com/ScopingInformationPackage.pdf>

²¹ “Environmental impact statements shall serve as the means of assessing the environmental impact of proposed agency actions, rather than justifying decisions already made.” 40CFR1502.2[g]

This is not true; the second Notice of Intent states no such thing.

The second Scoping Report also states that,

*City Council Resolution 07-039 defined the First Project as extending from East Kapolei to Ala Moana Center.*²³

Resolution 07-039 uses the term “Minimum Operable Segment” to describe the shortened project and never mentions “First Project”; the term in the second Scoping Report only serves to confuse the issue.

Also federal regulations require that, “*Draft environmental impact statements shall be prepared in accordance with the scope decided upon in the scoping process.*”²⁴

The first Notice of Intent was not superseded and the Alternative Analysis states that its alternatives were developed “*during a formal project scoping process held that would satisfy the requirements of the National Environmental Policy Act (NEPA) ...*”²⁵

The second Scoping Information Package and the second Scoping Report suggest that the first Notice of Intent was to merely satisfy Hawaii Revised Statutes 343, even though there is no mention of that in either of the two federal Notices of Intent or the subsequent Scoping Report. In any case, that does not wash since, if satisfying Hawaii Revised Statutes 343 was the only intent of the first Notice of Intent, would not the FTA’s issuance of it have been unnecessary?

In addition, this action by FTA would appear to violate 40CFR1506 which requires agencies

... to the fullest extent possible to reduce duplication between NEPA and state and local requirements.

And NEPA §1500.6 makes it clear that,

The phrase “to the fullest extent possible” in section 102 means that each agency of the Federal Government shall comply with that section unless existing law applicable to the agency’s operations expressly prohibits or makes compliance impossible.

This requirement is, in part, to avoid the kind of time consuming and confusing situation we now have.

Neither the FTA nor the City has made any attempt to clarify why FTA issued the second Notice of Intent. While the first Notice of Intent initiated the NEPA review process, the second Notice of Intent informed us that the NEPA review was “*initiated through this scoping notice.*” Have we not been in the NEPA process since December 2005? Why was a second scoping necessary?

The City did not make the case in the second scoping documents that re-scoping was being conducted because the first was inadequate or unsatisfactory. And if it had been inadequate would not the second scoping merely have been to supplement the first scoping and not to replace it?

There has obviously been insufficient “*public involvement,*” as required by SAFETEA-LU, if we cannot even find out whether the NEPA review process started on December 5, 2005, or March 15, 2007. Why cannot the public be told why the second scoping was authorized and if it invalidated the findings of the first Scoping?

We believe that the City and Parsons Brinckerhoff had the second Notice of Intent issued in an attempt to evade the more stringent investigative requirements of the NEPA process for the Managed Lane Alternative and possibly also for the purpose and needs statement.

²² Second Scoping Report, p. 5-1, at <http://www.honolulutraffic.com/NEPAScopingReport.pdf>

²³ Resolution 07-039. <http://www4.honolulu.gov/docushare/dsweb/Get/Document-59472/23mk11jh.pdf>

²⁴ 40CFR1502.9.

²⁵ www.honolulutraffic.com/AAD.pdf p. 2-2.

Six specific ways in which the Managed Lane Alternative was contrived to fail are listed below.

- a) Zipper lane inexplicably removed:
 - b) Excessive Managed Lane Alternative capital costs:
 - c) Inflated operating costs:
 - d) Effects on vanpools not considered.
 - e) Inefficient ingress/egress ramps:
 - f) Avoidance of due diligence:
- a) Zipper lane inexplicably removed

In November 2006, the City Council convened a Transit Advisory Task Force (Task Force) to advise it on the technical aspects of the Alternatives Analysis. Mr. David Glater, retired Chief Counsel of the U.S. Department of Transportation's Volpe Center, and Transportation Analyst for the Task Force, wrote in his Final Report to the City Council,

The description of the Managed Lane Alternative in Chapter 2 of the Alternatives Analysis states that, 'The H-1 zipper lane would be maintained in the Two-direction Option but discontinued in the Reversible Option.' (p. 2-4). However, no explanation is provided as to why the zipper lane would not be continued in the Reversible Option. The Managed Lane Reversible Option's addition of two Koko Head-bound elevated lanes for the morning commute appears to result in a net increase of only one lane if the inbound zipper lane were removed.²⁶

Why was the zipper lane taken out? When it remains in, it alone negates the conclusions of the Alternatives Analysis that the Managed Lane Alternative was inferior to rail in traffic congestion reduction as can be seen from the table below. With the zipper lane reinstated traffic on the H-1 freeway regular lanes would be less with the Managed Lane Alternative than the Fixed Guideway Alternative.

Congestion relief together with energy consumption, both of which are required to be analyzed by statute,²⁷ would be significantly improved with the Managed Lane Alternative. The following table is identical to the data in Table 3-12 in the Alternatives Analysis with the exception of the center column showing the zipper lane reinstated and a new line at the bottom of the page to total all traffic.

The only changes made to original column, which is to its left, are those in the grayed out cells. These reflect the same zipper lane traffic as in the Rail column and reduction of that same amount of traffic in the H-1 Freeway traffic. It shows that with the zipper lane reinstated the H-1 traffic is less than the traffic in the Rail Alternative.

For example, the single major freeway into downtown Honolulu from the far end of the study Corridor is H-1. It has seven lanes inbound during the morning peak hours, of which one is a zipper lane, one is an HOV lane, and five lanes are regular freeway lanes.

With the zipper lane reinstated the Managed Lane Alternative would provide two, or possibly three, additional lanes managed through dynamic pricing. Each lane would have a vehicle throughput close to twice that of each of the nearby congested freeway lanes.²⁸ Such lanes would add the equivalent of four to six lanes to the current (and projected through 2030) five regular freeway lanes (this is not provided for in the table that follows).

²⁶ Task Force Final Report. <http://www.honolulutraffic.com/TaskForceReport.pdf>

²⁷ 119 STAT. 1576 (d) (3) (D) http://bulk.resource.org/gpo.gov/laws/109/pub1059_109.txt

²⁸ FHWA Congestion Pricing Primer, www.honolulutraffic.com/congestionpricing.pdf

SCREENLINE/FACILITY	2030 Managed Lanes			2030 Managed Lanes			Rail		
	Reversible Option			Reversible Option with the zipper lane reinstated			Kamokila - Airport - Dillingham King with a Waikiki branch		
	Forecast	Volume/		Forecast	Volume/		Forecast	Volume/	
	Volume	Capacity	Level of	Volume	Capacity	Level of	Volume	Capacity	Level of
	(vph)	Ratio	Service	(vph)	Ratio	Service	(vph)	Ratio	Service
Kalauao Stream Koko Head bound									
H-1 Fwy	18,419	1.94	F	16,235	1.71	F	17,414	1.83	F
H-1 Fwy (HOV)1	2,769	1.46	F	2,769	1.46	F	2,701	1.42	F
H-1 Fwy (Zipper) 1	NA	NA	NA	2,154	1.13	F	2,154	1.13	F
Moanalua Rd	966	0.57	A	966	0.57	A	756	0.44	A
Kamehameha Hwy	3,121	0.9	E	3,121	0.9	E	2,923	0.85	D
Managed Lane	3,457	0.79	C2	3,457	0.79	C2	NA	NA	NA
Total General Purpose Traffic	22,507	1.39	F	20,322	1.39	F	21,093	1.31	F
Total HOV Traffic	2,769	1.46	F	4,923	1.46	F	4,855	1.28	F
Total Managed Lane Traffic	3,457	0.79	C2	3,457	0.79	C2	NA	NA	NA
Total All Traffic	28,733			28,702			25,948		

The grayed cells are the only ones changed from the Alternatives Analysis, Table 3-12.
 The Total All Traffic was not provided in the original. Others may wish to check our addition.
 Changes made were to reinstate the zipper lane using vehicle data from the fully built out rail option.
 Then reduce the H-1 Fwy forecast by a like amount. Other changes are merely recalculation of totals.

The congestion mitigation effects of these additional lanes to the seven-lane H-1 freeway are too obvious for the effect not to have been noticed during the Alternatives Analysis process.

b) Excessive Managed Lane Alternative capital costs

Parsons Brinckerhoff and the City grossly inflated the capital costs of the Managed Lane Alternative with the result that, if correct, it would result in it having twice the cost per lane-mile of any highway ever built in the U.S.

Parsons Brinckerhoff and the City also added unnecessary costs to the project by only using a 16-mile facility while not testing the viability of shorter 10 to 12-mile versions.

The City’s projected cost of \$2.6 billion in 2006 dollars for the Managed Lane Alternative was excessive. It was twice as expensive as the H-3 freeway per lane mile, almost as much per mile as the rail transit line, and seven times as much as the Tampa Expressway, a similar but even larger facility. And the City made it 50 percent longer than necessary. Further, the normal due diligence expected for a project of this magnitude was not undertaken.

Had the Managed Lane Alternative been projected at 11 miles long and priced to be the same as H-3 per lane mile (allowing for inflation), the projected cost would have been only \$915 million (still twice as much as the Tampa Expressway). Of this amount half could have been paid for with toll revenue bonds and the other half with less than three years of the ½ percent GE tax revenues (assuming the unlikely scenario of Senator Inouye being unable to obtain any federal funds).

And the city did not study the effects of the Managed Lane Alternative having three lanes. Tampa added the third lane after finding that this 50 percent increase in lane space would cost only 20 percent more than two lanes.

Anyone who has ever travelled the H-3 will find it absurd that the City's cost estimate of the Managed Lane Alternative could be the same as the H-3 (inflation-adjusted). The City's projected costs for the Managed Lane Alternative were calculated without any attempt to justify this high cost by comparing it to similar facilities in Hawaii or on the Mainland.

As discussed earlier, our cost projection was \$900 million for a 10-mile two-lane elevated highway, or \$90 million per mile in 2002. This cost when inflated using the *Price Trends for Federal-aid Highway Construction Index*,²⁹ results in \$134.7 million per mile in 2006 dollars.

However, this estimate was made before we were aware of the astonishing cost savings offered by the new construction method devised by Figg Bridge Company and used to construct the Tampa Expressway.

Tampa Expressway:

The actual contract price for the 17.5 lane miles of bridge structure was just over \$100 million. At approximately \$120 million, the deck cost for the segmental bridge portion of the project was approximately \$65 per square foot, far below the average cost for structures in Florida during the past 20 years. The average cost per lane mile for the reversible bridge is approximately \$7 million and is among the lowest for bridges constructed in the U.S.³⁰

The Figg Bridge Company tells us they “have experienced savings of approximately 40 percent to 50 percent when using precast segmental span-by-span construction in urban settings when compared to segmental balanced cantilever construction.”³¹

Using 45 percent as the average of these savings reduces our \$134.7 million per mile projection to \$74.1 million per mile in 2006 dollars, or \$37.0 million per lane-mile.

Recently Figg Bridge, which is familiar with Hawaii conditions, told us they believe there is no reason why the Managed Lane Alternative should not be built for the same cost per mile that they are experiencing in Florida for 2008 given the addition of a further 32 percent for the construction cost differential between Hawaii and Florida.

The 14-mile Expressway cost \$320 million in 2006 (net of an impending award of \$100 million for a sub-contractor's error). Using the same *Price Trends for Federal-Aid Highway Construction Index* that the City uses, and allowing the mid-point of costs to be 2004, we calculate that the cost to build it in 2006 would have been \$458.7 million.

The cost comparison index used to inflate Florida construction costs to Hawaii's level is an additional 32 percent, that being the rate given in the current *Civil Works Construction Cost Index*.³² Applying this factor to the inflation adjusted cost, results in \$605 million as the cost of constructing the facility in Honolulu. Dividing this by its 14-mile length results in \$43.2 million per mile.

While Tampa has three lanes, the Expressway Authority tells us that the third lane only added 20 percent more to their costs than if they had only built two lanes. We have, therefore, divided the Tampa cost per mile by only 2.4 instead of three to arrive at a cost for a two-lane facility. It

²⁹ <http://www.fhwa.dot.gov/programadmin/pt2006q4.cfm>

³⁰ Prevedouros, Panos D., PhD and Martin Stone, PhD, AICP. *Reversible Express Lanes*. Yearbook of Science and Technology 2008. McGraw-Hill, pp. 288-291, 2008.

³¹ Personal Communication, CEO, Figg Bridge Company.

³² <http://www.usace.army.mil/publications/eng-manuals/em1110-2-1304/entire.pdf> p. A-34.

results in a cost of \$18.0 million per lane-mile as a comparable cost for building such a facility in Honolulu.

Hawaii's H-3 Freeway:

The 16.1-mile H-3 freeway is a divided highway with two lanes in each direction and its construction required boring two miles of tunnels through the solid rock of the Koolau Mountains. The total cost was \$1.3 billion at completion in 1997 making it the most expensive highway per mile ever built in the U.S.

Lacking a distribution of costs by year, we have allowed the mid-point of construction cost as occurring in 1991. Inflating the \$1.3 billion to 2006 dollars using the *Price Trends for Federal-Aid Highway Construction Index*³³, results in \$2.7 billion.

This amount divided by the 16.1 mile length equals \$166.2 million per mile and dividing that by the four lanes results in \$41.6 million per lane-mile.

Capital costs summary:

We show below an adjusted cost per lane-mile comparison with two highway facilities, one from Tampa, Florida and the other, the H-3 freeway in Honolulu together with both the City and our Managed Lane Alternative cost projections.

The table below summarizes our calculations of all four facility costs per lane-mile after being adjusted for construction inflation costs and location cost differentials. This enables us to directly compare one with the other. The full calculation is given in detail in Appendix A.

Adjusted cost per lane-mile in 2006 dollars ³⁴	
Facility	\$millions
Tampa Expressway actual, adjusted to Honolulu costs	\$18.0
H-3 Freeway actual, adjusted	\$41.6
Our Managed Lane Alternative estimate, adjusted	\$37.0
City's Managed Lane Alternative estimate	\$80.5

Note that our Managed Lane Alternative estimate is within ten percent of the adjusted H-3 freeway cost. In consideration of the extensive trans-Koolau tunneling required for H-3 one would anticipate that our Managed Lane Alternative estimate should be somewhat less.

Even allowing for inflation and location cost differences, the adjusted Tampa Expressway cost is still less than half of either the H-3 or our Managed Lane Alternative estimate.

However, the most striking comparison is that the City Managed Lane Alternative estimate is twice that of the H-3 freeway and over four times that of the Tampa Expressway — after all adjustments. We do not believe that this projected cost would ever pass scrutiny by any members of the professional engineering community.

Our cost calculations for the Managed Lane Alternative, while compelling, need more work at a level of detail requiring resources that are not available to us. Our concern is that the City and Parsons Brinckerhoff did not make any serious effort to investigate it at any level of detail, as the section of lack of due diligence demonstrates.

At the behest of FTA, Booz Allen investigated the Fixed Guideway Alternative and the Managed Lanes Alternative construction costs. They produced a preliminary 8-page draft in April 2007 and later followed that in May 2007 with a 38-page full report.³⁵

³³ <http://www.fhwa.dot.gov/programadmin/pt2006q4.cfm>

³⁴ See Appendix A for details of cost adjustments for construction inflation and location differences.

³⁵ FTA PROJECT MANAGEMENT OVERSIGHT PROGRAM, Contract No. DTFT60-04-D-00013 Project No. DC-27-5041 Task Order No. 10

The 8-page draft does mention the Tampa Expressway and also Dr. Stone's comments,

Dr. Marty Stone [PhD AICP], planning director for the Tampa-Hillsborough County Expressway Authority, wrote a lengthy defense of the construction of his agency's reversible, elevated toll lanes in Tampa for HawaiiReporter.com on November 21, 2006. Dr. Stone criticized rail proponents in Honolulu for what he perceived as misrepresentation of the Tampa project in order to discredit the managed-lanes alternative in Honolulu.

However, neither Tampa nor Dr. Stone appear in the subsequent full report. This is a shame because it would have been interesting to know why an award-winning public planning official would go out on a limb to criticize fellow public officials.

The full report begins by telling us that the primary objective was to, “confirm absence of bias in cost estimation between the Fixed Guideway and Managed Lanes alternatives.” Not to determine whether there was any bias, but rather to confirm that there was none.

Booz Allen's 38-page report covers a wide variety of cost estimating material but evades a very important and most awkward fact, and that is the cost of the Tampa Expressway was \$300 million.

The investigator does not grapple with this fact; the word Tampa cannot be found in this document. The group that put together the expressway, the Tampa-Hillsborough Expressway Authority and Figg Bridge have won just about every national award possible³⁶ and built it at a remarkably low cost.

The Tampa cost is a stubborn and intractable fact, one that will never go away until rail proponents confront it instead of evading it as the City has, as the Transit Advisory Task Force did and as Booz Allen does in this case.

To be credible an assessment of the Managed Lane Alternative costs must be performed with “scientific accuracy” and has to reconcile the \$300 million for the Tampa Expressway (even to include the \$120 million error) with a similar project in Honolulu for \$2.6 billion. Allowance can be made for construction costs inflation, location differences, and other smaller issues but an honest appraisal is unlikely to be able to bridge this widest of chasms.

A credible assessment could start by talking to Figg Bridge to ask them how they did it and whether it could be done in Hawaii. No one involved in the pricing, and the validation of the pricing, of the Managed Lane Alternative — the City, the Council Task Force, or Booz Allen — has ever contacted Figg Bridge.

c) Inflated Managed Lane Alternative operating costs

Parsons Brinckerhoff and the City also inflated Managed Lane Alternative operating costs to make the project appear uncompetitive with the Fixed Guideway Alternative.

The Alternatives Analysis had forecast that operating costs for the Managed Lane Alternative would be greater than the FGA. These high operating costs occur because,

Transit operating costs for the Managed Lane Alternative would range between approximately \$251 and \$261 million as a result of additional buses that would be put in service under that alternative.³⁷

The Alternatives Analysis projects that the Managed Lane Alternative will need a fleet of 906 buses versus the No-Build Alternative requiring 614 buses.³⁸ This would result in the Managed

³⁶ <http://www.tampa-xway.com/documents/Awards/REL%20Awards.pdf>

³⁷ Alternatives Analysis, page S-4, at: <http://www.honolulutraffic.com/AAD.pdf>

Lane Alternative having 50 percent more buses than the No-Build Alternative yet the City projects only 5 percent greater ridership for it.³⁹ This small increase is projected despite the Managed Lane Alternative offering bus users the advantage of a congestion free bus ride from the H-1/H-2 merge to Downtown. It begs the question, why would the Managed Lanes Alternative offering much faster bus service than the No-Build not generate many more riders?

Fundamentally, the Managed Lane Alternative provides the existing bus system with a faster method of transiting the Corridor. Buses would be able to travel Koko Head bound in the AM peak on the Managed Lane Alternative at three times the current 20 mph operating speed of buses on the H-1 freeway. Buses can then return to their original departure point via the H-1 freeway in the Ewa Bound direction in relatively uncongested traffic.

This will allow some express buses to make two round trips in the time it presently takes to make one. One might anticipate that such efficiency would allow a considerable increase in ridership to be achieved at about the same operating costs as is experienced *currently*, allowing for inflation.

Instead, the Alternatives Analysis forecasts that the Managed Lane Alternative would require the operation of 48 percent more buses⁴⁰ than the No-Build Alternative while carrying only five percent more trips⁴¹ and that this would cost 36 percent more in operating costs than the No-Build and even more than the FGA.

In addition, the Alternatives Analysis projected a totally unnecessary 5,200 parking stalls for the Managed Lane Alternative, only slightly less than the 5,700 stalls projected for the entire rail line other than a pro-rata increase in the 529 stalls presently available, nor is there any need for bus stations on Managed Lane Alternative.⁴²

The City's and Parsons Brinckerhoff's plan has been to simply drive up operating costs to project that the Managed Lane Alternative is uneconomical in comparison with rail transit.

d) Effects on vanpools not considered.

The same benefits accruing to buses, including and freedom from toll charges, will also apply to vanpools. Such travel time savings can increase bus and van ridership and decrease both the amount of traffic and the share of low occupancy vehicles.

Vanpools have by far the lowest use of energy of any form of mechanized transportation using only 1,322 BTUs per passenger mile.⁴³ That is less than one-third of that used by the unweighted average of rail transit lines and so offers a significant opportunity to reduce energy use, reduce emissions, reduce traffic congestion, and since vanpools require no operating subsidy, an opportunity to reduce TheBus operating losses.

e) Ingress/egress insufficiently studied

Parsons Brinckerhoff and the City engineered the ingress and egress ramps in a way that could only result in heavy traffic congestion at the Koko Head end of the Managed Lane Alternative.

³⁸ Alternatives Analysis, Table 2-1, at: <http://www.honolulutraffic.com/AAD.pdf>

³⁹ The bus fleet data is taken from the Alternatives Analysis, Table 2-1, and the daily trips data from the Alternatives Analysis, Table 3-7. The percentages shown are calculated from these data. At: <http://www.honolulutraffic.com/AAD.pdf>

⁴⁰ Alternatives Analysis, Table 2-1.

⁴¹ The bus fleet data is taken from the Alternatives Analysis, Table 2-1, and the daily trips data from the Alternatives Analysis, Table 3-7. The percentages shown are calculated from these data.

⁴² Alternatives Analysis, pp. 3-7/8 and 3-10, at: <http://www.honolulutraffic.com/AAD.pdf>

⁴³ U.S. Dept. of Energy Data Book, table 2.12, at: http://cta.ornl.gov/data/tedb27/Edition27_Chapter02.pdf

The Task Force Report, Appendix 3,⁴⁴ contains the following statement,

In its discussion of travel time benefits of the Managed Lane options, the Alternatives Analysis projects that traffic congestion at both the H-1 Freeway access to the Managed Lane facility and at the Nimitz Highway exit at Pacific Street will negate travel time benefits gained from travel on the Managed Lane facility itself. The Analysis should explore how traffic congestion at these points could be alleviated (at least for mass transit vehicles) in order to enhance the overall performance of this Alternative as a transit guideway.

Parsons Brinckerhoff made no discernible effort to apply its engineering competence and ingenuity to the question of ingress and egress for the Managed Lane Alternative in the Alternatives Analysis.

In his letter to the City, copied to the Federal Transit Administration (FTA), Dr. Panos Prevedouros, Professor of Traffic Engineering at the University of Hawaii, Chair of the Transportation Research Board's Highway Micro-simulations Committee and himself a member of the Task Force, commented,

"... the most egregious violation of FTA's rules on alternative specification and analysis was the deliberate under-engineering of the Managed Lanes Alternative to a degree that brings ridicule to prevailing planning and engineering principles."⁴⁵

Dr. Prevedouros in his micro-simulation studies of differently designed entry and exit ramps for the Managed Lane Alternative shows that with properly designed ramps⁴⁶ traffic congestion can be reduced and excessive traffic congestion would not occur even during peak-hour traffic.

f) The City's lack of due diligence

The Task Force consisted of seven individuals to advise it on the Alternatives Analysis. Kazu Hayashida, a former Director of the Hawaii Department of Transportation (HDOT), was appointed Chairman.

In turn, the Chairman appointed two members to be a Technical Review Subcommittee to review construction costs. One had been a long time senior employee of the Hawaii State Department of Transportation (HDOT) and the other was the recently retired Director of Honolulu's City Department of Transportation Services and a former HDOT Director. Neither one had the expertise to judge construction costs in detail especially for a project of this magnitude and complexity.

After the Subcommittee's first report to the Task Force that they believed the projected Managed Lane Alternative costs in the Alternatives Analysis to be reasonable, we asked the subcommittee members for a list of the companies they had contacted. We believed there needed to be a detailed reconciliation between the Tampa Expressway cost (less the design error) of \$320 million and the Parsons Brinckerhoff estimate of \$2.6 billion for the Managed Lane Alternative. They told us they had only talked to the local office of Parsons Brinckerhoff, which had produced the projections, and had been assured that the cost estimates were reasonable.

They talked subsequently to engineers at the Hawaii Department of Transportation who told them that the 36-foot wide Managed Lane Alternative would need eight-foot supporting piers, totally ignoring the fact that the 59-foot wide Tampa Expressway has only six-foot piers. They mention that most agencies on the Mainland use \$100 to \$200 per square foot to price elevated highways but since they had not talked to Figg Bridge they would not know that they quote slightly less

⁴⁴ Attached as Appendix B.

⁴⁵ www.honolulutraffic.com/NEPAScopingReport.pdf p. A-180

⁴⁶ http://www.honolulutraffic.com/UHCS_Report41.pdf p. 39.

than \$100. Meanwhile they say that the State DOT uses \$400-\$500 per square foot but gives no sensible explanation of why that should be.

A project involving billions of dollars should be expected to receive reasonable due diligence on the part of the City Council's Task Force. To the contrary, there was little, if any, performed.

Accordingly, we suggested a consultation with the Tampa Expressway Authority and with PCL Construction Services, Inc., which had built both the Tampa Expressway and 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.

We also suggested they contact the Figg Bridge Company who had designed the Tampa Expressway incorporating its new low-cost construction methodology. One of the subcommittee members made a single, short phone call to the Tampa Expressway Authority; no one contacted PCL or Figg Bridge.

Dr. Martin Stone, AICP, Director of Planning, Tampa-Hillsborough Expressway Authority, whose project won the International Bridge, Tunnel and Turnpike Association's 2007 Award for the Best Toll Operations Project in the World, told them that the City's cost estimate was too high but they obviously did not follow up with that.

When one considers that Parsons Brinckerhoff maintains its national bridge practice in Tampa and actually designed a part of the Tampa Reversible Express Lanes project one would think that they should have been contacted also but it is our understanding that they were not. The Subcommittee report was made part of the Task Force Final Report.⁴⁷

The Task Force Final Report makes it clear that there was inadequate study of the Managed Lane Alternative.

"... the Alternatives Analysis should have presented variations on the Managed Lane Alternative that could make this alternative more attractive. Appendix 3 contains suggestions for fleshing out possible variants of the Managed Lane Alternative."⁴⁸

The Report's Appendix 3, "*Suggestions for further development of the Managed Lane Alternative*," written by the former Chief Counsel of the USDOT's Volpe Center, David Glater, acting as the Transportation Analyst for the Task Force, concurs in finding an under-engineering of the Managed Lane Alternative by producing the list of suggested modifications attached as our Appendix B.⁴⁹ From this it is obvious that Mr. Glater anticipated these modifications to be adopted in the Draft EIS process.

The City and Parsons Brinckerhoff ignored these and all other the recommendations of the Task Force regarding the Managed Lane Alternative and omitted from the Draft EIS any mention of the Task Force, or its Final Report, or the highly relevant questions it posed..

We believe this cavalier attitude on the part of the City regarding due diligence violates the rule that,

The Council on Environmental Quality (CEQ) requires the data and analyses in an EIS are commensurate with the importance of the impact.⁵⁰

⁴⁷ www.honolulutraffic.com/TaskForceReport.pdf

⁴⁸ Task Force Final Report. p. 4/7

⁴⁹ www.honolulutraffic.com/TaskForceReport.pdf pp. A-32 to A-33. Appendix 3 also attached as our Appendix B

⁵⁰ 40CFR1502.15

Subsequent to the Alternatives Analysis process, a micro-simulation study undertaken by Dr. Prevedouros and his students concluded that,

*[The Managed Lane Alternative] would reduce H-1 congestion by 35%, reducing drive times from 4 to 22 minutes. An express bus commuter would make the same trip in 12.7 minutes. The greatest benefit of HOT lanes would accrue to those who never use them; they would pay no added taxes or tolls yet would experience dramatically reduced congestion.*⁵¹

g) Summary of the case for reinstating the Managed Lane Alternative in the EIS:

*Methodology and scientific accuracy. Agencies shall insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements. They shall identify any methodologies used and shall make explicit reference by footnote to the scientific and other sources relied upon for conclusions in the statement. An agency may place discussion of methodology in an appendix. (40CFR1502.24)*⁵²

The Draft EIS and its accompanying technical memoranda offer no evidence that the City and Parsons Brinckerhoff ever undertook to “rigorously explore and objectively evaluate”⁵³ the Managed Lane Alternative as required by NEPA.

*Environmental impact statements shall be concise, clear, and to the point, and shall be supported by evidence that agencies have made the necessary environmental analyses.*⁵⁴ (emphasis added)

We ask that the FTA require the City re-assess the Managed Lane Alternative in a Supplementary Draft EIS using a less “client focused” and more independent consultant. Such an independent re-evaluation should perform the following:

1. The requisite due diligence a project of this magnitude warrants.
2. Have qualified cost estimators reconcile and document in detail the difference between the City’s Managed Lane Alternative cost projections and the actual costs of similar facilities in Florida and determine the reasons for the differences between them.
3. Project the outcome of using three-lanes rather than two for all or part of the facility.
4. Project the outcome of distributing Koko-Head bound traffic by way of egress ramps in a manner similar to that shown in Professor Prevedouros’ UHCS study.
5. Project the outcome of following the suggestions made in Appendix 3 of the Task Force Report.

If this is done the EIS will meet the requirements of this particular directive:

*During the draft EIS stage all reasonable alternatives, or the reasonable range of alternatives, should be considered and discussed at a comparable level of detail to avoid any indication of a bias towards a particular alternative(s).*⁵⁵

⁵¹ [Transportation Alternatives Analysis for Mitigating Traffic Congestion between Leeward Oahu and Honolulu: A Detailed Microsimulation Study](#). (UHCS Study) Directed by Professor Panos D. Prevedouros with the Participation of Undergraduate and Graduate Students Specializing in Transportation Studies. University of Hawaii. 2008.

⁵² http://edocket.access.gpo.gov/cfr_2008/julqtr/pdf/40cfr1502.24.pdf

⁵³ 40CFR1502.14

⁵⁴ 40CFR1500.2(b)

⁵⁵ <http://www.environment.fhwa.dot.gov/projdev/tdmalts.asp>

In addition the U.S. Secretary of Transportation has responsibilities under 49USC5309(d)(3),

... for a major capital investment grant, the Secretary shall analyze, evaluate, and consider

(A) the results of the alternatives analysis and preliminary engineering for the proposed project;

(B) the reliability of the forecasting methods used to estimate costs and utilization made by the recipient and the contractors to the recipient;

The Alternatives Analysis was legally insufficient and without a reinstatement of the Managed Lanes Alternative and a more rigorous and scientific assessment of its benefits in a Supplementary Draft EIS, how can the Secretary possibly make a reasoned judgment?

The importance to the people of Honolulu of thoroughly evaluating all reasonable alternatives as required by NEPA is that one or more of the alternatives may offer an opportunity at reasonable cost to provide mobility without needing to construct an elevated rail line along the Honolulu waterfront and through the center of town.

(e) Use the NEPA process to identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment.⁵⁶

Virtually all of Hawaii's environmental organizations are opposed to elevated rail running through the core of the city of Honolulu with all the concomitant visual blight and noise disturbances that it brings. We need to avoid such an environmental disaster if at all possible.

2. Use of the 2003 BRT Project

With some fairly minor modifications the 2003 Bus/Rapid Transit Project, as fully described in the July 2003 Final Environmental Impact Statement,⁵⁷ is a "reasonable alternative" that should have been considered in the current Draft EIS since with its projection of 313,000 daily linked trips, it was forecasting higher ridership than the current rail project for less than \$1 billion in capital costs.⁵⁸

The State's objection at that time to the Regional segment of the Project appears to have evaporated since they have been recently considering changes to H-1 similar to those contemplated in the 2003 FEIS.

Objections to the In-Town segment could easily be mitigated by adoption of the King/Beretania transit couplet described in Dr. Prevedouros' UHCS study. The In-town segment's time savings for the Downtown to Waikiki trip projected in the 2003 FEIS were inconsequential and should not affect the project's overall cost-effectiveness.

3. The EZway Plan

The basic goals of the EZWay plan are to provide:

- a) Substantial congestion relief largely caused at the H-1/H-2 and H-1/Moanalua freeway merges by adding critical high occupancy capacity,
- b) Express bus mass transit primarily in the west Oahu to downtown corridor.
- c) Traffic relief at other major congestion spots in Honolulu; and,
- d) Express transit connections to the University of Hawaii at Manoa.

⁵⁶ <http://www.nepa.gov/nepa/regs/ceq/1500.htm> §1500.2(e)

⁵⁷ http://www.honolulutraffic.com/feis_all_files.pdf

⁵⁸ http://www.honolulutraffic.com/feis_all_files.pdf p. 34.

The EZWay plan extends the transit service requirement of rail by providing a wider coverage, combines strong elements of managed lanes without the use of tolls, and takes advantage of the extensive experience of running bus public transit on Oahu and the Regional BRT plan of 2001-2003. The basic elements of the plan are outlined below and discussed in brief.

The EZWay consists of:

1. three elevated reversible lanes from the H-1/H-2 merge to Iwilei, with a priority BRT from downtown to the UH,
 2. express buses having exclusive use of freeway shoulders in order to travel at near free flow speeds from/to the EZWay,
 3. a downtown underpass for efficient downtown traffic distribution, and
 4. a new Auahi Street transit center for west Oahu bus passenger distribution to Kakaako, Ala Moana and Waikiki.
- (1) The EZWay structure is a fully managed expressway facility that can be described as three reversible elevated zipper lanes starting at the H-1/H-2 merge and terminating at Pier 16 with off-ramps at Aloha Stadium/Pearl Harbor, Lagoon Drive and Waiakamilo Street. The right lane is an exclusive bus lane throughout the length of the facility. At Iwilei, one elevated lane goes to Hotel St. to connect with King/Beretania BRT (University spur BRT). University BRT runs on priority lanes and with priority signaling along King and Beretania Streets.

The EZWay will open with a minimum occupancy requirement of three people per vehicle. This requirement may be increased in the future to avoid congestion. No tolls will be collected. Automated steep fines applied to low occupancy violators. No trucks allowed at any time. Open to all emergency vehicles at all times. Open to green vehicles with greater than 35 mpg EPA highway fuel consumption. This threshold is also subject to change in order to maintain at least 50 mph speeds in peak periods. Therefore, usage on the EZWay is controlled macroscopically, by occupancy and fuel efficiency requirement, rather than microscopically by electronically incrementing tolls.

- (2) Kapolei and Ewa Beach Bus Rapid Transit (BRT) connectors to Waipahu: Hybrid or fuel cell buses will be allowed to use shoulders on on-ramps and a few elevated passages or priority lanes at intersections (queue jumpers) which allow them to get by chronically congested spots. Includes a Waipahu (Farrington Hwy.) on-ramp to/from the EZWay.

Express buses from Waianae and Makakilo may use upgraded H-1 freeway shoulders to get to the EZWay quicker. The same priority treatment applies to express buses from Mililani and Wahiawa.

- (3) Ala Moana Blvd. Downtown Underpass (mini-tunnel) starting east of River Street and ending both at Alakea Street and Halekauwila Street. Same tunnel reverses in the PM period from Halekauwila Street and Bishop Street to Nimitz Hwy. contraflow lane onto the elevated zipper lanes. The underpass may continue to large new parking lot(s) east of Punchbowl Street. As a result, a large portion of vehicular traffic may "disappear" from downtown by going from the EZWay, through the mini-tunnel directly into a parking structure, one block east of Punchbowl Street.

- (4) New Ward Centers bus terminal on Auahi Street. Express buses that arrive from the EZWay stop at this terminal and either return to origin, or continue as regular bus to Ala Moana Center. Contracted tour buses may be deployed at this terminal for direct worker distribution to Waikiki hotels.

Appendix A

Ours and the City’s projected costs for the Managed Lanes Alternative versus the Tampa Expressway and the H-3 Freeway — in millions of dollars.

Tampa Expressway			
Cost index			
2001	144.8	\$320.0	original cost
2006	221.3	\$489.1	inflated using construction cost index
+32%		\$645.6	to allow for Florida/Hawaii cost change
length		14.0	Miles
		\$46.1	Cost per mile
Lanes		2.4	
		\$19.2	Cost per lane/mile based on 2 lanes

H-3 Freeway			
Year	Cost Index	Real cost	
1991	107.5	\$1,300	Original Cost
2006	221.3	\$2,676	Allowing for Construction inflation
Length		16.1	Miles
		\$166	Cost per mile
Lanes		4	
		\$42	Cost per lane mile

City’s Managed Lane Alternative projected cost			
Year		Real cost	
2006		\$2,572	
Length		16	miles
		\$161	Cost per mile
Lanes		2	
		\$80	Cost per lane mile

Honolulutraffic.com Managed Lane Alternative projected cost			
Year		Real cost	
2006		\$900	
Length		12	miles
		\$75	Cost per mile
Lanes		2	
		\$38	Cost per lane mile

Adjusted cost per lane-mile	
Facility	\$millions
Tampa Expressway	\$19.2
H-3 Freeway	\$42.0
Our MLA estimate	\$38.0
City’s MLA	\$80.0

All construction cost inflation is corrected using the PRICE TRENDS FOR FEDERAL-AID HIGHWAY CONSTRUCTION available at:

Appendix B

TRANSIT ADVISORY TASK FORCE

c/o Honolulu City Council
530 5. King Street, Room 202
Honolulu, HI 96819
Phone: (808)523-4139

Appendix 3

Suggestions for further development of the Managed Lane Alternative.

- The Alternatives Analysis' description of the characteristics of the Managed Lane Alternative should provide more complete information as to mass transit operations utilizing this facility. The Alternatives Analysis States that new express and other bus transit routes would be developed for operation on the Managed Lane facility. (p. 2-4) A fuller development and presentation of the transit services that would accompany the Managed Lane Alternative would be helpful (e.g., routes, new/existing stations). There is no description in the Alternatives Analysis of any proposed supportive operational practices off of the Managed Lane facility that would complement the facility's use as a transit guideway, e.g., transit stations connected to park-and-ride facilities, reserved lanes for transit vehicles on existing streets, traffic signal priority for transit vehicles.
- In its discussion of travel time benefits of the Managed Lane options, the Alternatives Analysis projects that traffic congestion at both the H-1 Freeway access to the Managed Lane facility and at the Nimitz Highway exit at Pacific Street will negate travel time benefits gained from travel on the Managed Lane facility itself. The Analysis should explore how traffic congestion at these points could be alleviated (at least for mass transit vehicles) in order to enhance the overall performance of this Alternative as a transit guideway.
- The description of the Managed Lane Alternative in Chapter 2 of the Alternatives Analysis states "The H-1 zipper lane would be maintained in the Two-direction Option but discontinued in the Reversible Option." (p. 2-4). However, no explanation is provided as to why the zipper lane would not be continued in the Reversible Option. The Managed Lane Reversible Option's addition of two Koko Head-bound elevated lanes for the morning commute appears to result in a net increase of only one lane if the inbound zipper lane were removed.
- The foldout photographic plans presenting the Managed Lane Alternative (Alternatives Analysis, Figures 2 -1 and 2 -2) do not clearly depict the ramp lanes necessary to access the Managed Lane facility from Interstate Highways H-1 and

H-2 in both the Two-direction Option and the Reversible Option, or the ramp lanes necessary to exit from the facility to these Interstate Highways.

- These plans show an approximately one-mile long “facility” in the vicinity of Kaonohi Street (Figure 2 - 1), and another in the vicinity of Radford Drive (Figure 2 - 2), however no description of these facilities is provided. In discussions with DTS Administration staff, these facilities have been identified as transit stations with attendant deceleration and acceleration lanes. Assuming this to be the case, it would be helpful to see the proposed location(s) of park-and-ride facilities planned near these stations, comparable to the information presented in Table 3 - 5, with respect to the Fixed Guideway Alternative. It is not apparent whether the stations would operate in both the Two-direction Option and the Reversible Option. What are the cost implications of adding access/exit ramps for transit vehicles instead of building elevated transit stations?
- Figure 2 - 2 shows a small section of the Managed Lane facility approximately 2000 feet Koko Head of the end of the facility at Nimitz Highway/Pacific Street. This component of the Managed Lane facility is not explained. Is it an elevated structure or at-grade? Which Managed Lane users would be allowed to access it?
- Figure 2 - 1 shows two ramps in the vicinity of Aloha Stadium. It is not clear whether these ramps would be available in both the Two-direction Option and the Reversible Option, or whether these ramps would be available to other than transit vehicles (e.g., to vans, three-person and two-person automobiles, and/or single-occupant automobiles paying tolls).

See also Financing Committee’s report discussing changes in permitted access to the Managed Lane facility that might make the facility eligible for New Starts and/or GET ½% surcharge funds.

Part II — Insufficient consideration of elevated rail impacts

Use all practicable means, consistent with the requirements of the Act and other essential considerations of national policy, to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment. 40CFR1500.2.¹

At the heart of this issue is that of the environmental harm of an elevated rail transit line thirty feet wide at an average of 35 feet elevation accommodating trains every 1½ minutes (three minute intervals in both directions) during the peak commuting time and three minutes at other times traversing the entire center of urban Honolulu including the waterfront.

The effect of elevated rail on the built environment has not been adequately addressed in the Draft EIS. The following requirement that there be discussions about the built environment is not fully addressed.

Urban quality ... and the design of the built environment including the reuse and conservation potential of various alternatives and mitigation measures.²

Many environmental organizations have gone on record as being opposed to such an elevated structure. The following are some quotes from their recent statements on elevated rail:

Outdoor Circle: *The lack of specific descriptions of how to overcome the visual misery that will be heaped upon the O'ahu landscape leaves our organization with little confidence that damages to the visual environment can or will be mitigated as the project moves forward ... Of equal concern to The Outdoor Circle is the pending fate of literally hundreds of street trees. Honolulu has fostered a worldwide image of being a city full of beautiful trees. It's an important part of Honolulu's appeal to both residents and visitors ... The Outdoor Circle believes the City has deceived the public about the visual impacts the project will have on our communities and our quality of life.*

Historic Hawaii Foundation: *The proposed Honolulu Transit Corridor project will have a dramatic impact on the landscape of the island of O'ahu; this includes not only the direct impact to specific parcels, but primarily the visual effect on the landscape and historic resources. HHF is concerned that the Draft EIS does not accurately take into account these larger impacts, but rather focuses on those adverse effects caused by the direct taking of land.*

Hawaii's Thousand Friends: *Elevated fixed rail routes will negatively impact the established landscape of Honolulu and significant view planes makai to mauka ... The rail line will be the ugly and block views with concrete rail beds 30-feet wide supported by pillars that are 35-40 feet high and six feet in diameter spaced at 150 feet intervals.*

Hawaii Architects position: *... the proposed elevated rail structure will block mauka and makai view corridors particularly along Nimitz Highway through historic Chinatown and Downtown ... Elevated rail stations and structures along the waterfront will make a poor situation worse by introducing an additional physical and visual barrier ... We are concerned that the areas below elevated rail structures and stations will become*

¹ <http://www.nepa.gov/nepa/regs/ceq/1500.htm> §1500.2(f) See also 49 USC 5301(e) and 42 USC § 4321

² 40CFR1502.16(g)

blighted, “nuisance” environments and that the lack of natural public sightlines into stations will diminish safety and security for passengers waiting on platforms. The proposed elevated platforms and concourses will also impede convenient access for both able-bodied and disabled users.

We believe that elevated rail violates the Oahu General Plan, which states, in part, we must,

Protect Oahu's scenic views, especially those seen from highly developed and heavily traveled areas & Locate roads, highways, and other public facilities and utilities in areas where they will least obstruct important views of the mountains and the sea.³

We believe there has been inadequate consideration of the detrimental effects of elevated rail. What has happened in other communities that once had an EI, such as New York’s 3rd Avenue EI? What are the detrimental impacts of the elevated sections of Miami’s Metrorail and San Juan’s Tren Urbano? What happened in San Francisco when they removed the Embarcadero Freeway segment?⁴

It should be noted that the Managed Lanes Alternative and the other suggestions for alternatives, the 2003 Bus/Rapid Transit proposal, and the EZWay plan, do not propose any elevated structures through the urban core or in residential areas or along the waterfront. We believe that had these other alternatives been objectively studied as required by NEPA that one of them would have been the “environmentally preferable alternative.”

The environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA's Section 101. Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources.⁵

As was also commented on by the Corps of Engineers:

... the overall project purpose is used for evaluating practicable alternatives under the Guidelines, which require that if the overall purpose of a project is practicably met through several alternatives, the Corps can only authorize the least environmentally damaging practicable alternative.

City renderings misrepresent reality

We asked a professional commercial artist with experience in streetscape renderings to comment on those renderings shown in the Draft EIS on pages 4-65 through 4-84. Following are their comments:

In nearly every rendering, the cast shadows have been deemphasized, making the project appear much less impactful. They show shadows, but do not show the correct size and extension to match the existing shadow reach (shown by other objects in the photo), or especially darkness. This has a significant psychological effect, and they use it to the extreme.

The shadows on the structures themselves have also been deemphasized to give the appearance of blending into the scene, which is also a distortion. They make extensive

³ Oahu General Plan, III, Objective B, policies 2 & 3. <http://honoluluapp.org/planning/GeneralPlan/GP3.pdf>

⁴ NEPA implementing regulations provide that “[e]nvironmental impact statements shall be concise, clear, and to the point, and shall be supported by evidence that agencies have made the necessary environmental analyses” (40 C.F.R. § 1500.2(b)) [emphasis supplied].

⁵ Council on Environmental Quality’s 40 Questions and Answers. <http://ceq.hss.doe.gov/nepa/regs/40/1-10.HTM> 6(a)

use of a 'white' concrete appearance. Is that a correct material they will use? Even if so, the shadows will be significantly more prominent.

Their choice of view locations/angles is carefully done, of course.

The width of the guideway and its vertical thickness are smaller than what the actual plans call for. Many of the support columns are quite obviously slimmer than they should be.

They are showing support columns on thin grassy strips of median with virtually no 'buffer' between the median curb and the pillar itself. That is not legal.

One of the Dillingham shots (DEIS, fig 4-27) shows a pillar resting directly in the right turn lane. I'm thinking that may be a no-no.

These also do not properly indicate the foliage that will be removed.

The Dillingham shot similar to our rendering talks about trees 'softening' the visual impact, but they don't mention the trees that will be removed on the Mauka side of the street. The angle they use disguises it. The Fort Street Mall shot is a joke. They positioned the shot to put as many trees as possible in the view line.

The photos and renderings on the following pages illustrate our concern with the impacts of elevated rail along the waterfront and through the center of Honolulu:



Our artist carefully calculated the appropriate support column and rail bed widths and added the barriers necessary to protect the support piers. The City’s version is below and the differences are obvious; the dimensions are smaller and the structure appears less intrusive. On all City renderings (Draft EIS pp. 4-65 to 4-84), the environmental impacts are deliberately minimized.



Figure 4-28 Viewpoint 12—Dillingham Boulevard near Honolulu Community College and Kapālama Station Area, looking ‘Ewa



Our artist's rendering of the Varsity Station on University Avenue looking mauka.



Our artists rendering of the sound mitigation panels to be used along Dillingham Blvd.



The City's renderings fail to convey overhead rail's effects on light.



The Aloha Tower station from the City's video of it available on their website.



Photo of straddle bent supports under a New York highway. Notice that in the City rendering below how the sheer ugliness of straddle bent supports is minimized.



Figure 4-36 Viewpoint 20—Mother Waldron Park near Halekauwila Street/Cooke Street Intersection, looking 'Ewa

Part III — The Locally Preferred Alternative must be studied in the EIS

Proposals or parts of proposals which are related to each other closely enough to be, in effect, a single course of action shall be evaluated in a single impact statement.¹

A problem of “segmentation” may also occur where a transportation need extends throughout an entire corridor but environmental issues and transportation need are inappropriately discussed for only a segment of the corridor.²

As stated in Bill 79 (2006)³ and Ordinance 07-001:

The locally preferred alternative for the Honolulu High-Capacity Transit Corridor Project shall be a fixed guideway system between Kapolei and the University of Hawaii at Manoa ... with the Waikiki branch ... The city administration is authorized to proceed with preparation of an environmental impact statement for the locally preferred alternative (LPA)

Resolution 07-039 defines a shortened minimum operable segment between East Kapolei at the University of Hawaii-West Oahu, near the future Kroc Center, and Ala Moana Center.

The second and last Scoping Report, p. 5-3, states clearly that:

Both UH Mānoa and Waikīkī service are included in all fixed guideway alternatives that will be evaluated in the EIS.

However in the Draft EIS, the detailed environmental analysis and documentation applies only to the core 20-mile alignment between East Kapolei and Ala Moana Center. The additions from East Kapolei to West Kapolei and from Ala Moana Center to UH Mānoa and to Waikīkī are described as “future planned extensions.”

The Locally Preferred Alternative should be examined in the EIS in its entirety as was intended by both Notices of Intent and authorized by the City Council. The three “planned extensions” should not have been segmented from the Locally Preferred Alternative in this Draft EIS.

As the Corps of Engineers commented for the second Scoping Report, A-10,

The Corps believes the environmental consequences resulting from construction of the “Minimal Operable Segment” and all planned extensions must be considered in the project-level EIS, particularly if the Project [meaning the LPA] benefits, wholly or partially, are derived from one or more of these future extensions and station locations.⁴

We believe that segmentation of what was formerly the Locally Preferred Alternative into a newly designated “Project” (formerly the Minimum Operable Segment and later the First Project) and “planned extensions” was surreptitiously undertaken to avoid the following FTA policy.

... the Federal 'undertaking' in a Fully Funded Grant Agreement (FFGA) will no longer be segmented into Project and Local Activities. All activities related to a Federal undertaking will be identified as the Federal Project. The Federal funds will be distributed among all the activities in the project at a level funding ratio equal to the

¹ 40CFR1502.4[a]

² <http://www.fhwa.dot.gov/environment/alts.htm>

³ <http://www.honolulutraffic.com/Bill79Final.pdf>

⁴ Corps of Engineers comments, Second Scoping, App. A-1, p. A-6, at: www.honolulutraffic.com/NEPASCopingReport.pdf

*percentage of Federal financial participation in the entire project. Thus, all the elements and activities of the project, as described in the FFGA will be funded, in part, with Federal funds; and, the requirements attached to the use of Federal funds will apply to each such task, unless otherwise exempted as provided in the applicable laws, regulations and policies.*⁵

Not segmenting the original Locally Preferred Alternative would mean that the City would get far less federal funds for the Minimum Operable Segment and make the MOS even more financially untenable than it is already (see Discussion of Finances).

The lack of any credible rationale in the Draft EIS for the City’s segmentation of the “planned extensions” from the LPA intimates that the segmentation was done to facilitate funding and acceptance of the Draft EIS since cost and environment issues for the extensions to UH Manoa and Waikiki are proportionally greater than for the Minimum Operable Segment.

These combined segments of the project are intended to provide approximately 30 miles of unified rail transit line. The cost and environmental impacts of the integrated project will be significantly greater than the isolated Minimum Operable Segment or “Project” that is specified.

The UH Manoa and Waikiki extensions will traverse the core urban center of Honolulu creating significant cumulative environmental impacts including prolonged lifestyle disruption due to construction difficulties, excavation of culturally sensitive areas, severe noise impacts through close-quartered residential neighborhoods resulting in great emotional distress, impossible to mitigate visual impacts, and negative impacts on property values within close proximity to the rail line.

*When several foreseeable similar projects in a geographic region have a cumulative impact, they should be evaluated in a single EIS.*⁶

Like the two sections of the Winston-Salem beltline at issue in North Carolina Alliance, the three remaining sections of the Locally Preferred Alternative,

*... constitute cumulative actions, and therefore should [be] considered in the same environmental impact statement.*⁷

The *de minimus* discussion of cumulative impacts of the planned extensions in the Draft EIS do not justify segmentation of the Locally Preferred Alternative under NEPA. This segmentation has occurred because of funding considerations and the arguments found in the Draft EIS are merely post-hoc rationalizations for this funding-driven violation of the law.

The Draft EIS violates both NEPA and the FTA regulations because it fails to consider the fully detailed cumulative actions of the Minimum Operable Segment and the “planned extensions” in a single Environmental Impact Statement, because these sections were segmented due to funding considerations rather than the NEPA criteria.

The Draft EIS, p. 2-41, states that,

The Ala Moana Center and Convention Center Stations would be transfer points between the UH Mānoa and Waikīkī branch lines.

This raises innumerable question about how this would all work and what would be the impacts. For example, the engineering drawings⁸ show that the planned extension to UH would entail

⁵ http://www.fta.dot.gov/funding/thirdpartyprocurement/bppm/grants_financing_6105.html

⁶ Resources, Ltd. v. Robertson, 35 F.3d 1300, 1306 (9th Cir. 1993), quoted in North Carolina Alliance for Transportation Reform v. U.S. Dept. of Transportation, 151 F. Supp. 2d 661, 685 (M.D.N.C. 2001).

⁷ 151 F.Supp. 2d at 684.

⁸ Draft EIS, Appendix A, Sheet RP024.

adding a branch line in the vicinity of the junction of Queen and Waimanu Streets. This would likely near double the width of the rail bed. The drawings also show that these two rail lines cross over one another at Piikoi and Kona Streets with one line continuing at the 35 feet level and the one above at 65 feet. This may be an even greater eyesore than was in the original plan.

How are the two Ala Moana stations going to work? And how are the promised three minute headways to be maintained with these future extensions.

Further, if Ala Moana Center and the Convention Center are transfer points to Waikiki and UH Manoa, how will that work environmentally? If UH Manoa and Waikiki are also to have service every three minutes, how is that going to work with three separate lines — Ala Moana only line, UH Manoa line and Waikiki line — in operation?

Is the lower Ala Moana Station to be torn down and replaced by the originally contemplated higher one? Or is it that the structures at Ala Moana Center present insurmountable engineering difficulties and that the City has no plan to ever build beyond Ala Moana Center?

Or is it that the “planned extensions” could not possibly pass the FTA’s cost-effectiveness test? It is obvious that the “planned extensions,” which would require a separate EIS,⁹ would not come close to meeting the cost-effectiveness requirements.

In another significant omission, the Draft EIS does not give total transit boarding or trip data for the various rail alternatives, only Fixed Guideway Boardings.¹⁰ However, according to the Alternatives Analysis the greatest transit ridership generated of all the rail alternatives is 294,100 versus 281,900 for the 20.7 mile MOS. That is a mere 4.5 percent increase in ridership requiring a 25 percent increase in capital costs, again according to the Alternatives Analysis.

Frankly, failing a coherent plan that addresses these issues, we are presently inclined to believe that Ala Moana Center is the final terminus and there may well be no real intent to build the “planned extensions.”

Had the City Council and the public been aware of this segmentation at the time of the Alternatives Analysis and Scoping, the public responses may well have been very different. For example, the Managed Lane Alternative would have been considered more useful if there was to be no direct rail connection to UH Manoa.

In addition, the Minimum Operable Segment will have almost no impact on residential property in the dense urban areas whereas the planned extensions to UH Manoa and Waikiki will have significant adverse impacts on high rise condominiums, hotels, and family dwellings.

For all these reasons the Locally Preferred Alternative should be examined in the EIS in its entirety as was intended by both Notices of Intent and authorized by the City Council and as required by law.

⁹ Draft EIS, 2-41.

¹⁰ Draft EIS, Table 3-28.

February 6, 2009

Part IV — First Project, Phase I, is an illegal segmentation.

Agencies shall not commit resources prejudicing selection of alternatives before making a final decision. 40CFR1502.2[f].

The Locally Preferred Alternative is a major federal action. To have the First Project, Phase I, East Kapolei to Pearl Highlands, under construction before such time as the City is granted a Full Funding Grant Agreement, or even a Record of Decision, or being given a Letter of No Prejudice¹ clearly violates federal regulations on evaluating environmental impacts (23 CFR 771.111(f)), which require that:

In order to ensure meaningful evaluation of alternatives and to avoid commitments to transportation improvements before they are fully evaluated, the action evaluated in each environmental impact statement (EIS) or finding of no significant impact (FONSI) shall:

Connect logical termini and be of sufficient length to address environmental matters on a broad scope;

Have independent utility or independent significance, i.e., be usable and be a reasonable expenditure even if no additional transportation improvements in the area are made; and

Not restrict consideration of alternatives for other reasonably foreseeable transportation improvements.

To build Phase I prior to receipt of a Letter of No Prejudice would violate the regulations. Connecting East Kapolei to Pearl Highlands where the first three of the six stations are in open fields² is not exactly connecting “*logical termini*” especially as the Kapolei terminus and the next two stations are in open fields, and where for the last half of its six-mile length is in an area of low population density.³

While the Phase I costs, ridership and cost-effectiveness are not detailed in the Draft EIS, it is obvious that it cannot possibly have “*independent utility or independent significance.*”

For these reasons, the construction of Phase I would be an illegal segmentation.

¹ Spot Report #2, PE Entry Readiness Report, on HHCTCP by Booz Allen, October 2008.

² See video <http://www.honolulustransit.com/video/?id=14>

Part V — Unjustifiable forecasts:

1. Ridership forecasts

The No-Build forecast is irrational and it stems from the fact that proponents refuse to recognize that transit continues to lose market share to the automobile and has been doing so for as long as the Census has been collecting commuting data.

We can also measure the decline by using total urban transit boardings and divide it by urban populations — a number that used to be known as the *riding habit*.

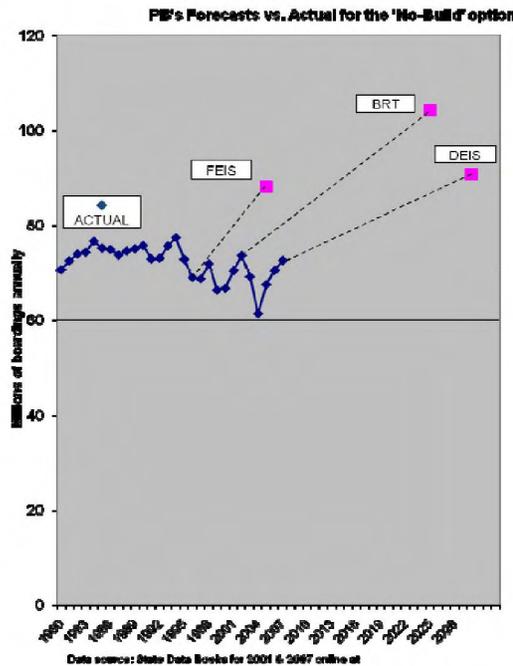
Transit boardings per capita of urban population peaked in 1917 at 289 boardings annually. It declined slowly to 276 by 1926 then dropped precipitously during the Depression to 176 by 1940.

It increased during World War II and then dropped back down to the earlier level at the end of the war and then declined steadily to 49 in 1970. Since then it has dropped to today's level of 42.

While the decline continues on it is at a much slower rate. And that is because of the subsidies.

In 1960 transit companies were, for the most part, profitable tax-paying privately-operated businesses. In the 1970's began the massive subsidies for transit from local, state and federal governments — some \$260 billion just in the last ten years. It has slowed the decline in transit's market share but it has not stopped it.

Honolulu has followed the national trend. Our ridership is slowly declining over time as can be seen from the chart below using the City's ridership data.¹ But while the ridership is declining despite



increased population and providing higher service levels to the public, the City and Parsons Brinckerhoff continue to forecast increases for the No-Build alternative, which is what happens if we do little more than we are doing now and have done for the last thirty years.

The chart shows the last three forecasts made by Parsons Brinckerhoff for the No-Build option for the 1992 rail project, the 2003 forecast of No-Build for the BRT program and now the No-Build forecast for this Draft EIS.

The importance of the No-Build forecast is that the rail transit forecast uses the same computer forecasting model. Thus, if the No-Build is optimistic, so are all the forecasts that use the same model, such as the rail transit forecast.

¹ http://hawaii.gov/dbedt/info/economic/databook/Data_Book_time_series/ Table 18.25

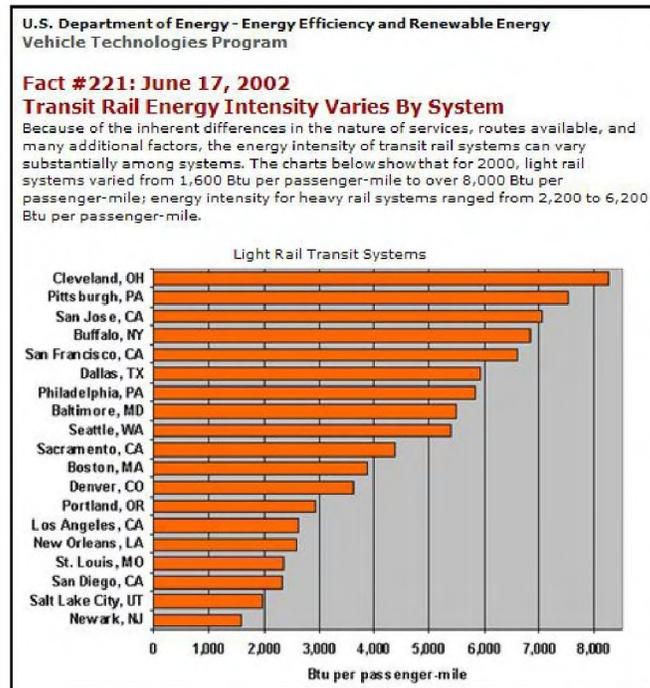
Take a hard look at the above chart. Remember that during this period Oahu has had two periods of incredible fuel cost spikes and declines. We have had periods of great prosperity in the 1980s and late 1990s to 2007 and economic hardship in the early 1990s. We have had population growth and a period of slight population decline. And while we had a general slight decline in bus ridership it was a considerable decline relative to population growth.

The historical data strongly suggests that we will get more of the same unless major changes were to occur.

Since the last two forecasting models have been drastically wrong on Honolulu ridership and since there have been dramatic shortfalls in ridership projections for virtually all new U.S. rail transit systems,² the public should be wary of the ridership forecasts for the Project and consider the impacts of lower (and higher) ridership on their future taxes.

The last rapid transit line to open in the U.S. was Puerto Rico’s Tren Urbano line which only achieves 40 percent of its FTA approved ridership projections.

2. Projected energy savings have not been carefully examined.



The U.S. Dept. of Energy has measured the energy use of rail by system and finds the following:

“Because of the inherent differences in the nature of services, routes available, and many additional factors, the energy intensity of transit rail systems can vary substantially among systems. The charts [see here and Appendix C] show that for 2000, light rail systems varied from 1,600 Btu per passenger-mile to over 8,000 Btu per passenger-mile; energy intensity for heavy rail systems ranged from 2,200 to 6,200 Btu per passenger-mile.”³

The average energy use of automobiles is 3,400 Btus per passenger mile according to the U.S. Dept. of Energy.⁴ Thus,

many rail lines consume more energy per passenger mile than does the average automobile with a typical 1.1 occupants.⁵

Undoubtedly, a full train uses less energy per passenger than a single-occupant vehicle; however, trains are rarely full in both directions except in extremely highly populated metropolitan cities.

² See page 5.

³ [Fact #221: June 17, 2002 Transit Rail Energy Intensity Varies By System](#)

⁴ Source: 2007 DOE Energy Data Book Table 2.13. At: http://cta.oml.gov/data/tebd27/Edition27_Chapter02.pdf

⁵ Load factor used was 1.1 occupants for automobiles and 1.72 occupants for light trucks and SUVs.

Source: http://cta.oml.gov/data/tebd27/Edition27_Appendix_A.pdf

Where the confusion arises is that rail proponents unjustly tout the *weighted* average of rail transit energy use. This average is dominated by the energy efficient New York subways, which carry 57 percent of the nation's rail transit traffic and masks the relative energy inefficiency of most other rail lines.

But Honolulu is not going to use the ultra heavy rail equipment, such as New York's, because it does not have the population size to support such equipment.

In addition, autos travel directly from their point of origin to their destination, and therefore, the total miles travelled are much less than by transit – and thus more energy efficient.

With the continued growth of hybrid cars and buses we may expect their energy efficiency to continue to significantly improve up to the horizon year of 2030 while rail transit projections are not forecasting savings.

Construction energy use:

Another form of energy use is that used for its construction. The following is an excerpt from the Congressional Budget Office testimony given by its Director, Alice Rivlin, before the Subcommittee on Transportation, Committee on the Environment and Public Works, United States Senate on October 5, 1977.

"In particular, new heavy rail systems appear much less energy-efficient than new bus services, when the energy needed to build roadways and track, the energy needed to manufacture and maintain vehicles, the energy used to heat and light stations, the energy required to drive to stations, and the directness of alternative modes of travel are taken into consideration. The principal reason for this is that the limited route mileage of rail systems necessitates a high degree of auto travel to and from stations, resulting in overall, door-to-door travel patterns that are less energy-efficient than rail travel by itself."

In short, we believe it will be very difficult for the City to show scientifically and “in an accurate, clear, complete, and unbiased manner”⁶ that the proposed rail line is more energy efficient than the average automobile.

The Draft EIS shows:

Daily operating energy for Airport Alternative:	1,224 million btu/day
Construction energy for Airport Alternative:	7,480,000 million btu

This means construction energy would be 20 years worth of daily energy usage. If we allow a 50 year life for the train and spread the construction energy use over its life then we need to increase the daily usage by 40 percent to get a better picture of energy use.

The construction energy issue together with the shorter distance covered by the automobile makes it almost impossible for even a highly energy-efficient rail line to be more energy efficient than the regular automobile and this should be made clear to the public.

3. The Draft EIS financial plan is unduly optimistic

The City's recently released financial plan shows us that rail is to be funded primarily by the ½ percent General Excise Tax surcharge amounting to \$4.1 billion and the federal government with \$1.4 billion for a total of \$5.5 billion.

The Airport Alternative capital plan shows federal New Starts funding of \$1.4 billion and this is much higher than what has been discussed heretofore.

⁶ OMB Guidelines for ensuring the integrity of information. <http://www.whitehouse.gov/omb/fedreg/reproducible2.pdf>

What is not discussed is that the additional operating subsidy for rail is not accounted for in the cash flow plan but will be paid for with the General and Highway Funds, which is to say, by property taxes. This subsidy grows 34 percent over inflation through 2030 and the total operating subsidy amounts to \$5.4 billion during this time.

In addition, even if this highly optimistic financial plan is met, not only would we have \$5.4 billion to meet out of property taxes (either increases or foregone reductions) but we will also have over \$500 million more in General Obligation bonds than at present.

The City plan shows the GE tax surcharge revenues growing at 5.4 percent compounded annually for 2008-2022 even though that is much faster than the 4.5 percent that it grew during 1992-2005.

The table below consists of the city's forecast taken directly from their Cash Flow Tables associated with the Draft EIS. Calculations of City collections of the ½% GE tax increase					
Fiscal year	Our calculation		City forecast		\$ diff.
	Mills. \$'s	% change	Mills. \$'s	% change	
2007	\$48	Actual	\$13	N/A	\$35
2008	\$169	Actual	\$161	N/A	\$8
2009	\$173	2.5%	\$188	16.8%	-\$15
2010	\$167	-3.5%	\$198	5.3%	-\$31
2011	\$169	1.3%	\$207	4.5%	-\$38
2012	\$174	3.0%	\$214	3.4%	-\$40
2013	\$180	3.1%	\$228	6.5%	-\$48
2014	\$190	5.9%	\$242	6.1%	-\$52
2015	\$203	6.6%	\$253	4.5%	-\$50
2016	\$215	5.7%	\$265	4.7%	-\$50
2017	\$222	3.4%	\$274	3.4%	-\$52
2018	\$231	4.0%	\$285	4.0%	-\$54
2019	\$243	5.3%	\$300	5.3%	-\$57
2020	\$250	3.0%	\$309	3.0%	-\$59
2021	\$260	3.9%	\$321	3.9%	-\$61
2022	\$273	5.0%	\$337	5.0%	-\$64
2023	\$143	5.0%	\$261	N/A	-\$118
Total	\$3,312		\$4,056		-\$744

Our calculation uses actual collections given by the City's Department of Budget and Fiscal Services for fiscal years 2007 and 2008⁷, the projection of percentage increases and decreases in GE tax collections by the State Council on Revenues 2009-2015⁸, and the City's projection of annual percentage increases in GE tax revenues for 2016 through 2023 as calculated from their Cash Flow Tables.⁹

The net result is a \$744 million shortfall from what the City is projecting. It shows that the City is going currently into deficit and when the economy turns positive the City never catches up.

⁷ <http://hawaii.gov/tax/monthly/2008fyr1.pdf> The gross revenues are shown before the State takes its ten percent share.

⁸ ESTIMATES OF GENERAL FUND TAX REVENUE: FY 2009 to FY 2015 at http://www.state.hi.us/tax/cor/2009gf01_with0112_Rpt2Gov.pdf page 4 of 8.

⁹ http://www.honolulutraffic.com/Cash_Flow_Table.xls

4. Risk assessment understated

The risks that Honolulu taxpayers are taking that are possible, and more likely probable, from inaccurate forecasting are poorly and insufficiently addressed.

The federal government has published two formal studies comparing predicted with actual impacts of New Starts projects. In another omission these are not so much as mentioned or referenced in the Draft EIS.

The financial risk assessment is superficial in that it describes events that could affect the financial performance of the Project, but does not address the consequences. For example, the Draft EIS discusses factors that could affect Project capital costs and funding, and Project operating costs and revenues, but it does not elaborate (or even mention) the consequences of any shortfall in capital of operating cash flow.

A significant capital shortfall could result in stoppage of the Project at an intermediate stage, and/or delay in completion of any or all of the extensions or be made up by incurring further debt.

A significant shortfall in cash flow could result in deferral of other City projects or programs, or would have to be made up by City subsidies, which are primarily funding by property taxes.

At a minimum, the risk assessment should include such items as:

- How any additional borrowing will be paid for.
- A sensitivity analysis of Project negative cash flows (capital or operations) on property taxes.
- A detailed analysis of projects that would have to be delayed (including this one) based on insufficient capital.
- Identification of environmental projects that would be affected (sewage plant upgrades, collection system upgrades, sewer maintenance).
- Identification of quality-of-life issues (road maintenance and repairs, park maintenance and other city services).

The EIS needs to explain “in plain language” the financial risks taxpayers will be taking with the City’s rail transit proposal.

This is particularly important for Honolulu since, on a per capita basis, the \$4.5 billion in 2008 dollars (or \$5.4 billion in year of expenditure dollars) projected cost would make it by far the

Rail transit costs per capita of population¹⁰

MSA	Cost in millions 2006\$’s	Metro area population (thous.)	Cost per capita
Dallas	\$1,067	5,222	\$204
Denver	\$358	2,582	\$139
Portland	\$1,643	2,265	\$725
Sacramento	\$307	1,797	\$171
Salt Lake City	\$376	1,334	\$282
St. Louis	\$464	2,604	\$178
Pittsburgh	\$1,051	2,571	\$409
Honolulu	\$4,200	920	\$4,565

most expensive rail lines on a per capita basis ever built in the U.S, even allowing for inflation and without cost overruns.

To make a sensible assessment of the financial risks of the project, policy makers need to review the experiences of other metro areas that have built rail lines with actual versus projected capital and operating costs and ridership. The use of comparable projects is widespread in business planning and certainly in real estate. It should be an FTA requirement that transit agencies include comparable data in their EISs.

¹⁰ The data in the table is not completely reliable but does approximate the relative per capita costs.

Until recently the only official U.S. Department of Transportation (USDOT) comparisons of other metro areas capital cost projections and ridership versus actual outcomes, was the 1990 *Pickrell Report*¹¹ which focused “upon the accuracy of projections that were available to local decision-makers at the time the choice among alternative transit improvement projects was actually made” (original emphasis). This is usually the time when the Locally Preferred Alternative is selected.

This report showed cost overruns for the eight rail projects studied as averaging 42.8 percent. Importantly, they revealed a wide error range from the best, the original Pittsburgh light rail line, at 11 percent under projection, to the worst, at 83 percent over.

The second study, FTA’s *Predicted and Actual Impacts of New Starts Projects*¹² was released last year and also compares projected costs at the Alternatives Analysis/Draft EIS and FEIS stages with actual costs. The average cost overrun in this study was 40.2 percent.

Many agencies use cost forecasts that were made much later in the process, some just before the opening of the line, long after the primary decisions had been made. These tend to show much higher projected costs and therefore show a greater likelihood of coming in “under budget.”

Furthermore, in reviewing the two studies we find little consistency in the percentage overruns. While the averages are around 40 percent over, they vary from 28 percent under projection to 186 percent over so we can take little comfort from the averages.

The following table shows the range of errors and also the average error for both cost and ridership projections in each of the two reports.

More important than averages is the distribution of the various error rates. For example, if the resulting costs of the 21 projects were between ± 10 percent of the original projections it would be a reasonable indication to the public of the accuracy of the projections.

Projections versus Actual — Ridership and Costs				
	costs vs. projections		Ridership vs. Projection	
	Cost range	Average	Range	Average
Pickrell Report	-11% to +83%	+43%	-28% to -85%	-62%
FTA CPAR Report	0% to +186%	+40%	-84% to +39%	-39%

But when faced with actual results that range from on budget to nearly triple the projection, what is the public to make of it? Based on the wide range of uncertainty, what is the public to believe?

Even if we were to use just the average it would increase the Honolulu Project cost from \$4.5 billion to \$6.3 billion — a nearly \$2 billion increase. And ridership would be 39 percent lower than projected,¹³ which would mean fare revenues of \$800 million less than the City is planning on through 2030.

The City Administration will undoubtedly paint this as ridiculously improbable and wildly pessimistic.

However, each of these recent 21 capital cost projections was thought at the time to be reasonable by both the transit agency and its consultant who produced them. Just as our City Transportation Department and its consultants, Parsons Brinckerhoff and InfraConsult, also believe their current cost projections are reasonable.

¹¹ Pickrell, Don H. *Urban Rail Transit Projects: Forecast Versus Actual Ridership and Costs*. U.S. Dept. of Transportation. October 1990. Informally known as the Pickrell Report.

¹² [Federal Transit Administration. *The Predicted and Actual Impacts of New Starts Projects — 2007: Capital Cost and Ridership, April 2008*](#). We used the Alternatives Analysis/Draft EIS forecasts for comparison as did the Pickrell Report.

¹³ [http://www.fta.dot.gov/documents/NSPA2007_Final\(1\).pdf](http://www.fta.dot.gov/documents/NSPA2007_Final(1).pdf) Table 7.

In addition, the FTA's in-house analysts and outside consultants also examined each of these 21 capital cost projections in great detail and thought them all reasonable.

And so here we have innumerable transit planners, engineers and accountants, all well educated and experienced and all believing that, as a the result of their hard work, the cost projections are, dare we say it, reasonable. Yet each new project seems to ignore past experience, and in most cases, the project comes in significantly over budget.

The FTA believes that projects that are within ± 20 percent range are reliable.¹⁴ On this basis, Honolulu's forecast could have nearly a billion dollar cost overrun and still be considered "reliable." But, in this latest FTA report, more than half of the projects exceeded the 20 percent deviation limit.

The public needs to understand the financial risk and implications of various levels of cost overruns, and then consider how, or even if, they, as taxpayers, can cope with the resulting financial impact. After all, Hawaii's senior Senator, Daniel Inouye, said that if the City had to spend one billion dollars fixing the sewage treatment facility, it would bankrupt us. The rail project could cost as much as \$9 billion, before accounting for operating losses and bond interest. What would be the financial impact of that?

The Draft EIS shows us clearly that traffic congestion, with rail, is going to be far worse than it is today.¹⁵ Is it reasonable to expect that Honolulu taxpayers to afford to risk this many billions of dollars on a project that will not reduce traffic congestion below today's unbearable levels?

The issue here is that the public needs to be provided in the EIS with sufficient quantified information about the financial risks and uncertainties in the project for them to understand what could be the impact on their future property taxes.

The Draft EIS states that transit operating subsidies will increase from the current less than 10 percent of the City Budget to 14 percent by 2030.¹⁶ Since the subsidies will continue to be funded from the City's Highway and General Funds,¹⁷ what will be the effect on property taxes given a range of errors for both capital costs and ridership?

5. Operating subsidies are understated:

The City projects operating subsidies to be 70 percent of operating costs, which has been a long-term City Council policy. Thus the higher the operating costs, the higher the subsidies.

Operating costs for the mid-priced Airport Alternative are projected to be \$68 million¹⁸ annually to carry unlinked trips (boardings) of 29.9 million¹⁹, or \$2.27 per unlinked trip.

However, nowhere in the Draft EIS is there any indication of what is being used as the basis for calculating operating costs.

Since we are planning to build an elevated steel-on-steel rapid transit system we should compare our projected operating costs with those of other U.S. cities with elevated rapid transit lines.

There are just two elevated lines that seem appropriate, the Miami Metrorail and San Juan's Tren Urbano. Their actual operating costs per trip in 2007 were \$4.61²⁰ and \$6.83²¹ respectively. This would lead us to believe that Honolulu's projected \$2.27 may be understated.

¹⁴ CPAR p. 9.

¹⁵ Kalauao Screenline AM Peak Koko Head bound traffic volumes are forecast in the Draft EIS to increase by nearly 10 percent from today's levels with no additional highway capacity planned.

¹⁶ Draft EIS, pp. 6-7 & 8.

¹⁷ Draft EIS, Section 6.4.4.

¹⁸ Draft EIS, Table 6-3.

¹⁹ Draft EIS, Table 3-16 shows 95,000 average weekday boardings, which multiplied by 315 results in 29.9 million.

²⁰ http://204.68.195.57/ntdprogram/pubs/profiles/2007/agency_profiles/4034.pdf

If we examine actual versus projected operating costs and ridership of other rail lines we can get a handle on the risks being taken in this cost category.

The FTA's latest assessment of ridership published last year showed average shortfalls from the projected ridership were 39 percent while the earlier *Pickrell Report* showed an average shortfall of 61 percent.

Another FTA Report released last year dealt with cost overruns for operating costs.²² This showed an average cost overrun was 87 percent. This was remarkably close to the only other assessment of operating cost overruns, which was the *Pickrell Report* averaging 83 percent.

If we apply the 87 percent overrun to Honolulu's projected \$68 million operating costs it results in \$127 million. And if we reduce ridership by 39 percent to 58 million and then divide that into the \$127 million it results in operating costs of \$6.81 per unlinked trip, or three times the amount currently projected.

Since the aggregate operating costs for bus and rail combined through 2030 is currently projected at over \$7 billion²³ the public should be made aware of the significant risk being taken in this area.

There is also a danger that we may have made insufficient allowance in the calculation for transit police, which is usually a major expense and transit agencies often omit it from their forecasts by accounting for it in other parts of their budgets.

Los Angeles pays in excess of \$50 million annually for their Transit Police with about three times the rail ridership projected for Honolulu. We note that is no mention of such costs in the Draft EIS.

6. Replacement and Refurbishing

The city does not explicitly warn the public in the Draft EIS that virtually all of the rail cars, rail lines and other equipment will have to be replaced, or rehabilitated, also known as R&R, within 35 years from the start of operations.

Other than to project that the City will expend \$62 million²⁴ on R & R through 2030, the following two paragraphs is all that is said.

The estimates include ongoing costs for replacing, rehabilitating, and maintaining capital assets in a state of good repair throughout the forecast period (2007 to 2030). Rail rehabilitation and replacement costs are expected to begin 16 years after initial construction activities are completed. Draft EIS, 6-3.

6.4.3 Ongoing Capital Expenditure Cash Flow: Systemwide ongoing capital expenditures include all necessary replacement, rehabilitation, and improvements to the existing system (TheBus and TheHandi-Van) as well as the Project. Funding sources used to pay for these capital expenses consist of discretionary and formula-based Federal funding programs (see Section 6.2.3, Funding Sources for Ongoing Capital Expenditures, for descriptions of these programs). Any resulting funding gap is assumed to be bridged on an annual basis with City General Obligation Bonds, as is currently the case with transit-related budgets. Therefore, the resulting ongoing capital sources and uses would balance in any given year. Draft EIS, 6-10.

²¹ http://204.68.195.57/ntdprogram/pubs/profiles/2007/agency_profiles/4094.pdf

²² http://www.fta.dot.gov/documents/CPAR_Final_Report_-_2007.pdf

²³ Draft EIS Cash Flow Tables, Airport Alternative, total YOES.

²⁴ Draft EIS Cash Flow Tables. In 2008 dollars, or \$116 million in YOES.

Failing to provide for R&R results in this Washington DC headline that “Metro needs \$11.3 billion” which goes on to explain that,

*\$7 billion alone is needed just to maintain service and keep the system running safely and reliably from 2010 to 2020. That includes repairs to leaking tunnels and crumbling platforms, as well as replacements for aging rail cars.*²⁵

The following are some of the provisions made for R&R by other rail transit lines such as San Francisco’s BART, the Chicago Transit Authority’s rail transit, and Atlanta’s MARTA, as follows:

Chicago Transit Authority capital expenditure plan spells out that:

*“All rail cars rehabilitated at mid-life (12-13 years), overhauled at their quarter-life points (6 and 18 years), and either rehabilitated or replaced at the end of their useful life (25 years).”*²⁶

Similarly, the Atlanta Transit Authority concurs:

*“MARTA started work last year to rebuild and upgrade all 48 miles of track. It is an extensive project that will not be complete until mid-2007. Our trains have run every day for over 25 years – this work is necessary to keep the system strong for the next 25 years and beyond. The Track Renovation is part of a major capital program that also includes the overhaul of over 200 of MARTA’s rail cars.”*²⁷

Los Angeles plans for R&R using the Peskin model:

“Projected rehabilitation and replacement costs are based on a methodology developed by Robert Peskin of KMPG Peat Marwick (commonly called Peskin Model). This methodology was developed based on actual costs experienced by the Washington Metropolitan Area Transit Authority (WMATA). Actual WMATA rehabilitation and replacement costs were compared to their original installation capital costs. The MTA rail rehabilitation and replacement costs were calculated in the same manner based on the Metro Blue, Red, Gold and Green Lines original installation capital costs. The rehabilitation and replacement costs are estimated to begin five years after a rail line begins revenue operations. Some limited repair is assumed in the forecasting model for the first few years as reflected in the five-year MTA Capital Improvement Program (CIP) and annual budget.”

Based on the MTA Office of Management and Budget near term forecast and Peskin Model in the later years the rail rehabilitation and replacement costs through 2025 are \$4.7 billion.²⁸

BART began its first major repair and rehabilitation plan in 1994 at a cost of \$1.2 billion within only 20 years of opening. At the time, their balance sheet showed “Facilities, property and equipment” was \$2.4 billion, net of \$0.7 billion in depreciation.²⁹ Thus, the total invested in this category through 1994 had been \$3.1 billion.

The Bay Area’s Transportation and Land Use Coalition³⁰ tells us that the BART Planning Department reported to the Board of Directors meeting on November 9, 2000, that total repair and refurbishing requirements for BART during 2001 to 2030 would be \$6.8 billion spread across the entire 30-year period.

²⁵ <http://www.washingtontimes.com/news/2008/sep/23/metro-needs-113-billion/>

²⁶ <http://www.transitchicago.com/business/capitalprogram.html>

²⁷ http://www.itsmarta.com/newsroom/latest_news/singletrack.htm

²⁸ [Short Range Transportation Plan for Los Angeles County, Technical Document 2003](#)

²⁹ Bay Area Rapid Transit, 1972 through 1994 Annual Reports.

³⁰ <http://www.transcoalition.org/reports/overext/overextended.html>

The San Francisco Bay Area voters were unaware at the time of the BART decision that BART would need to refurbish or replace “facilities, property and equipment” in amounts far exceeding BART’s original cost; they had been sold on the concept that once you have built rail it is there forever.³¹

Honolulu’s rail line financial plan should make provision for potential refurbishing liabilities using the Peskin model (or similar) to provide decision-makers with the appropriate financial information detailing likely future financial obligations for replacement, refurbishing and system enhancement. The Peskin Model³² is used by the Washington Metro and Los Angeles among other. A useful discussion of the subject is in the [2004 Status of the Nation's Highways, Bridges, and Transit, Chapter 7c](#).

The Federal Transit Administration (FTA) requires that,

“Agencies planning major capital investments need to incorporate the [repair and refurbishing] (R&R) of those assets in the later years of the capital plan in addition to the ongoing R&R of the existing asset base.”³³

It would be helpful to think in terms of the Aloha Stadium which has cost far more to maintain than it ever cost to build. As the Honolulu Advertiser explained last year,

The estimated \$185 million renovation of Aloha Stadium is expected to transform the rusting, 33-year-old facility into a “new stadium,” ... Since opening in 1975 at a cost of \$32 million, the state's largest facility has been dogged by costly repairs and lawsuits. From 1985 to 1995, rust treatment cost \$80 million.³⁴

The City needs to establish a detailed schedule of R&R obligations that the rail line is likely to face in future years so that the public is fully aware of what they are getting themselves into.

The impacts of forecasting errors

A major concern is that the City’s Cost-Effectiveness Rating of “Medium” hovers near the “Medium-Low” rating, which would make the project ineligible for federal New Starts funds.

The FTA rating is calculated by dividing projected new riders into the total of projected annualized capital costs and projected annual operating costs. At present the FTA rates a new trip as cost-effective if it costs \$22 or less. That amounts to a subsidy of over \$10,000 per new rider annually.

³¹ Excerpt from a speech by Todd Litman at the Mayor’s Transit Symposium.

³² Peskin, Robert L. 1988. “Methodology for Projecting Rail Transit Rehabilitation and Replacement Capital Financing Needs.” In: Transportation Research Record 1165. Washington, DC: Transportation Research Board, National Research Council.

³³ Source: http://www.fta.dot.gov/printer_friendly/planning_environment_2423.html

8.3.1.1 Rehabilitation and Replacement. The rehabilitation and replacement (R&R) of capital resources is needed for several reasons. First, capital resources wear out. Stations, maintenance facilities, track-way, signal systems, propulsion systems, and vehicles all have distinct useful lives. These assets must be re-capitalized before deterioration leads to service disruptions. Second, technological obsolescence due to the availability of parts or technological advances may spur the replacement of various systems. Old rail cars may become increasingly difficult to maintain and require replacement or agencies may wish to implement communications based train control, automatic train stop, or passenger information systems to improve system reliability and safety. Third, changes in operating or safety policies may require new capital investment. One example is station or vehicle enhancements to assure compliance with the American’s with Disabilities Act (ADA).

Prudent capital planning requires an inventory of the agency’s assets and an evaluation of the expected useful life of each major component. An R&R cycle is assumed for each of the major assets and annual costs are projected at least 20 years into the future. Agencies planning major capital investments need to incorporate the R&R of those assets in the later years of the capital plan in addition to the ongoing R&R of the existing asset base.

In most cases, the capital costs for R&R will vary markedly from one year to the next due to different cycles and widely varying costs for the numerous components. Agencies typically establish reserve accounts, sometimes called sinking funds, to provide the funds for sudden increases in capital spending. Occasionally, agencies smooth out the R&R cost swings by using a multi-year rolling average as the annual cost estimate.

³⁴ <http://the.honoluluadvertiser.com/article/2008/Jun/27/In/hawaii806270385.html>

However, if the projections are not achieved and recent FTA assessments of cost overruns for capital costs, cost overruns for operating costs and shortfalls in ridership occur then the cost effectiveness calculation changes dramatically.

We are also concerned that the fact that at this late stage the Project does not yet have an FTA rating yet there is no explanation of why that should be, as is required by NEPA:

... (Draft EISs) must present — for all alternatives — the information used by FTA to assign New or Small Starts ratings if that information has been vetted by FTA. If the information has not been vetted with FTA, then the absence of the information must be highlighted in the document.

The intent of this policy is to comply with FTA requirements for AAs and the Council on Environmental Quality for DEISs by identifying information relevant and important to a decision on a locally preferred alternative. If this requirement cannot be met, publication of the AA or AA/DEIS would not be delayed; rather, the absence of the information and its relevance must be explained in the AA or AA/DEIS. (emphasis added)³⁵

Instead, in the Draft EIS, the City slides by the issue rather than highlighting and explaining why the Project is not rated. This is the City's explanation:

The cost-effectiveness indices for the Build Alternatives compared to the baseline fall within the "medium" range established by FTA for its New Starts ratings, which, along with other considerations, is currently required to qualify for New Starts funding. FTA is currently reviewing the estimates made for ridership and user benefits, operating and maintenance costs, and capital costs for the Build Alternatives. If these results hold up through subsequent phases of project development, along with other FTA considerations, the Project would be in the competitive range for funding consideration. Funding recommendations are made each year from among the projects that have completed the planning and project development process, including the National Environmental Policy Act process. These recommendations reflect the merits of the projects competing for available Federal funds at the time, as well as the availability of New Starts funding authorization. DEIS, p. 7-9.

The fact that the Project is not yet rated is not made clear. It is certainly not highlighted since the subject is not even mentioned in the Executive Summary. This is important as without a rating the Project cannot enter Preliminary Engineering.

³⁵ <http://edocket.access.gpo.gov/2007/pdf/07-2774.pdf> p. 30913.

Appendix C

Energy Use per passenger mile of rail systems		
Light Rail Transit		
City, State	Btu per passenger-mile	Average
Cleveland, OH	8,250	
Pittsburgh, PA	7,526	
San Jose, CA	7,035	
Buffalo, NY	6,839	
San Francisco, CA	6,591	
Dallas, TX	5,935	
Philadelphia, PA	5,828	
Baltimore, MD	5,508	
Seattle, WA	5,383	
Sacramento, CA	4,368	
Boston, MA	3,878	
Denver, CO	3,612	
Portland, OR	2,927	
Los Angeles, CA	2,621	
New Orleans, LA	2,594	
St. Louis, MO	2,366	
San Diego, CA	2,337	
Salt Lake City, UT	1,970	
Newark, NJ	1,597	
Sub Total light rail	87,165	4,588
Heavy Rail Transit		
City, State	Btu per passenger-mile	
Cleveland, OH	6,173	
Lindenwold, NJ	5,027	
Miami, FL	4,928	
Boston, MA	4,464	
Chicago, IL	4,205	
Philadelphia, PA	4,001	
Baltimore, MD	3,845	
Washington, DC	3,761	
New York, NY	3,388	
Oakland, CA	2,745	
Brooklyn, NY	2,482	
Atlanta, GA	2,249	
Sub Total heavy rail	47,268	3,939
Grand Total all rail systems	134,433	4,337
U.S. Dept. of Energy, Transit System Energy Use.		
Average auto		3445
Average transit bus		4323
Source: U.S. Dept. of Energy Data Book, tables 2.12 & 2.13		

Part VI — “Strategic misrepresentation” in the Draft EIS

The University of Aalborg, Denmark, conducted the most extensive international study ever of actual versus estimated costs in transportation infrastructure development.¹ A summary of the study was published in the American Planning Association Journal. The study concluded:

"Based on a sample of 258 transportation infrastructure projects worth US\$90 billion and representing different project types, geographical regions, and historical periods, it is found with overwhelming statistical significance that the cost estimates used to decide whether such projects should be built are highly and systematically misleading. Underestimation cannot be explained by error and is best explained by strategic misrepresentation, that is, lying. The policy implications are clear: legislators, administrators, investors, media representatives, and members of the public who value honest numbers should not trust cost estimates and cost-benefit analyses produced by project promoters and their analysts."

Other distinguished and authoritative transportation experts have warned about cost misrepresentations in rail projects. Dr. John Kain, Chair Emeritus of Harvard's Economics Department, wrote *Deception in Dallas*, Dr. Don Pickrell, Chief Economist of the U.S. Department of Transportation's Volpe Center, wrote what is known as the *Pickrell Report*, Dr. Martin Wachs, Head of Rand Corporation's Transportation practice and Chair Emeritus, Department of Urban Planning, UC-Berkeley, wrote *When planners lie with numbers,*² and there have been many, many others.

The Draft EIS needs to make clear the amount of scholarly literature produced by academic transportation experts² detailing the misrepresentations by promoters of rail transit and the virtual

¹ Flyvbjerg et al. *"Underestimating Costs in Public Works Projects: Error or Lie?"* American Planning Association Journal, Summer 2002.

² Hall, P. (1980). Great planning disasters. Harmondsworth, UK: Penguin Books. Penguin Books.

Hall, P. (n.d). Great planning disasters revisited. Unpublished manuscript, Bartlett School, University College, London. UK: Cambridge University Press.

Holm, M. K. S. (1999). Inaccuracy of traffic forecasts and cost estimates in Swedish road and rail projects. Unpublished manuscript, Aalborg University, Department of Development and Planning.

Hufschmidt, M. M., & Gerin, J. (1970). Systematic errors in cost estimates for public investment projects. In J. Margolis (Ed.), *The analysis of public output* (pp. 267–315). New York: Columbia University Press.

Kain, J. F. (1990). Deception in Dallas: Strategic misrepresentation in rail transit promotion and evaluation. *Journal of the American Planning Association*, 56(2), 184–196.

Leavitt, D., Ennis, S., & McGovern, P. (1993). The cost escalation of rail projects: Using previous experience to re-evaluate the calspeed estimates (Working Paper No. 567). Berkeley: Institute of Urban and Regional Development, University of California.

Mackie, P., & Preston, J. (1998). Twenty-one sources of error and bias in transport project appraisal. *Transport Policy*, 5(1), 1–7.

Merewitz, L. (1973a). How do urban rapid transit projects compare in cost estimate experience? (Reprint No. 104). Berkeley: Institute of Urban and Regional Development, University of California.

Merewitz, L. (1973b). Cost overruns in public works. In W. Niskanen, A. C. Hansen, R. H. Havemann, R. Turvey, & R. Zeckhauser (Eds.), *Benefit cost and policy analysis* (pp. 277–295). Chicago: Aldine.

Nijkamp, P., & Ubbels, B. (1999). How reliable are estimates of infrastructure costs? A comparative analysis. *International Journal of Transport Economics*, 26(1), 23–53.

Pickrell, D. H. (1990). *Urban rail transit projects: Forecast versus actual ridership and cost*. Washington, DC: U.S. Department of Transportation.

Pickrell, D. H. (1992). A desire named streetcar: Fantasy and fact in rail transit planning. *Journal of the American Planning Association*, 58(2), 158–176.

Simon, J. (1991). Let's make forecast and actual comparisons fair. *TR News*, 156, 6–9.

Skamris, M. K., & Flyvbjerg, B. (1997). Inaccuracy of traffic forecasts and cost estimates on large transport projects. *Transport Policy*, 4(3), 141–146.

Szyliowicz, J. S., & Goetz, A. R. (1995). Getting realistic about megaproject planning: The case of the new Denver International Airport. *Policy Sciences*, 28(4), 347–367.

Wachs, M. (1986). Technique vs. advocacy in forecasting: A study of rail rapid transit. *Urban Resources*, 4(1), 23–30.

Wachs, M. (1989). When planners lie with numbers. *Journal of the American Planning Association*, 55(4), 476–479.

complete lack of such literature defending them. The public needs to be so sufficiently informed about it that no one will be able to complain in the future that they were not warned.

*NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA.*³

There are many misleading elements of the Draft EIS. There are both errors of commission and omission and are dealt with below under the following headings:

1. Omissions of relevant material.
 - a) OMPO surveys
 - b) Future traffic conditions vs. today omitted.
 - c) The Draft EIS omits relevant information about highways.
 - d) Change of observed volumes without discussion
 - e) Does not discuss the differences between Draft EIS and Alternatives Analysis
2. Misleading purpose and need statement.
3. Renderings that do not match reality

1. Omissions of relevant material

a) OMPO surveys:

In its entirety, this is how the Draft EIS describes the 2004 Oahu MPO Survey⁴:

As part of its work to update the Regional Transportation Plan, the O'ahu Metropolitan Planning Organization (O'ahuMPO) surveyed O'ahu residents about transportation issues in 2004. The survey results identified traffic congestion during the commute period in the study corridor extending from Ewa and Central O'ahu to Downtown Honolulu as the biggest concern. Nearly twice as many residents responded that improving transit was more important than building more roadways. Seventy percent of the respondents believed that rail rapid transit should be constructed as a long-term transportation solution, and 55 percent supported raising taxes to provide local funding for the system. (Draft EIS p. 1-3).

From this one would not gather that the same Oahu MPO Survey Summary said in its entirety:

“Based on the survey, most residents appear to accept the necessity of tax increases to fund specific capital projects, such as new road-building, road widening and extensions. Between a Rapid Rail system and the BRT, residents do not indicate a strong preference for one over the other. There is broad support for either system, generally, with strongest support for the Rapid Rail system coming from the Ewa/Kapolei and Leeward areas of Oahu.”

Or that in a later page it would summarize question responses as follows:

- 60% would reportedly support a tax hike for road widening or extensions.
- 59% would support a tax hike for new road-building.
- 57% would back a tax hike for a rail rapid transit system.

Wachs, M. (1990). Ethics and advocacy in forecasting for public policy. *Business and Professional Ethics Journal*, 9(1–2), 141–157.

Walmsley, D. A., & Pickett, M. W. (1992). The cost and patronage of rapid transit systems compared with forecasts (Research Report 352). Crowthorne, UK: Transport Research Laboratory.

² [Edwards, Chris. Government Just Can't Contain Itself. Cato Institute. September 23, 2003](#)

³ <http://edocket.access.gpo.gov/cfr/2002/julqtr/40cfr1500.1.htm>

⁴ www.honolulutraffic.com/issuessurvey.pdf

- 54% would back tax increases to improve the bus system.

Adding to these errors of omission is that the City avoided altogether discussing a subsequent 2006 OMPO Survey⁵. Here is one excerpt from this Survey's Summary:

Oahu traffic and, in particular, congestion in Ewa/Kapolei, remains a key concern of residents. The key priorities are: (1) road-widening of the H-1 in the Honolulu corridor; and (2) widening Farrington Highway in Kapolei and Waianae.

Relative to Rail Rapid Transit, over one-third of Oahu residents indicated that they would use the system on a regular basis.

There is also majority support for the concepts of HOT lanes from Ewa to downtown and for a Pearl Harbor bridge or tunnel, but not for funding construction via higher taxes.

b) Future traffic conditions versus today's traffic omitted

From the beginning the City and Parsons Brinckerhoff have misled the public into believing that rail transit will relieve congestion.

Far from "supporting proactive public involvement"⁶ our elected officials and their appointees and consultants have continually alluded to the idea that rail transit will result in traffic congestion relief even though the Alternatives Analysis and the Draft EIS both show that traffic congestion will get significantly worse with the rail transit alternative than it is today.

A significant omission in the Draft EIS is that nowhere does it discuss future highway conditions with rail. In fact, it deliberately goes out of its way to avoid doing so. For example, the discussion of traffic conditions in section 3 assesses future traffic conditions for No-Build but not with the Build alternative. Nor does the Summary of Findings on page 3-53, which is shown below.

Existing Conditions: Increasing traffic congestion and constrained transit operating conditions have reduced system reliability and mobility for all travelers.

Effects of the No Build Alternative: Traffic congestion would worsen, even with \$3 billion in other planned roadway improvements, affecting mobility and reliability for all travelers.

Effects of the Build Alternatives: [No mention of traffic congestion].

The omission of future traffic congestion with the Build Alternative compared to the congestion that exists today in both the body and the summary shows that it was deliberate.

In addition, the Draft EIS has avoided any discussion of the new 2006 *National Strategy to Reduce Congestion on America's Transportation Network*⁷. Its preamble reads,

Congestion is one of the single largest threats to our economic prosperity and way of life. Whether it takes the form of trucks stalled in traffic, cargo stuck at overwhelmed seaports, or airplanes circling over crowded airports, congestion is costing America an estimated \$200 billion a year.

Each year, Americans lose 3.7 billion hours and 2.3 billion gallons of fuel sitting in traffic jams and waste \$9.4 billion as a result of airline delays. Worse, congestion is affecting the quality of Americans lives by robbing them of time that could be spent with families and friends.

⁵ http://www.honolulutraffic.com/Trans_Proj_Surv_Results_2006.pdf

⁶ It is the policy of the ... Federal Transit Administration (FTA) to aggressively support proactive public involvement at all stages of planning and project development. http://www.fhwa.dot.gov/environment/pi_pol.htm

⁷ <http://isddc.dot.gov/OLPFiles/OST/012988.pdf>

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.

Given the current traffic conditions in Honolulu, and also the following NEPA requirement, one would think the new policy worthy of mention, if not analysis:

An agency shall identify and discuss all such factors including any essential considerations of national policy which were balanced by the agency in making its decision and state how those considerations entered into its decision. 40CFR1505.2(b)

c) Highway capacity data omitted

In the Alternatives Analysis, Table 3-12, highway capacity data was given for each of the corridor’s highway components. This has been omitted and makes it difficult to understand what caused the dramatic reductions in the Draft EIS from the Alternatives Analysis in forecast traffic volumes at the various screenlines.

For example, the Kalauao screenline in the Alternatives Analysis shows that the observed traffic volume for 2003 during the peak hour slightly in excess of the highway capacity shown, which motorists in the corridor would find accords with experience. However, the Draft EIS observed volume for 2005 shows an eight percent reduction in traffic from 18,870 to 17,300, and less than the highway capacity shown in the Alternatives Analysis, which certainly does not accord with experience.

Kalauao Screenline AM Peak Head bound volumes AA= Alternatives Analysis			Koko
AA Highway Capacity	AA 2003 Actual	AA 2030 No-Build	AA 2030 Build
18,450	18,870	28,023	26,101
Draft EIS Highway Capacity	Draft EIS 2005 Actual	Draft EIS 2030 No-Build	Draft EIS 2030 Build
N/A	17,300	20,800	18,910

Source: Alternatives Analysis, Table 3-12, Draft EIS, Tables 3-12 & 3-20

Further, there is a 28 percent reduction in projected traffic volume for the Draft EIS 2030 Build Alternative compared with that of the Alternatives Analysis from 26,101 down to 18,910. No explanation is given for this.

We know that with no planned widening of H-1 the freeway cannot accommodate either the 18,910 given in the Draft EIS, let alone the 26,101 vehicles per hour projected by the Alternatives Analysis. Are we to assume that the City and Parsons Brinckerhoff recognize that the highways will be excessively congested and that the excess traffic will be accommodated in extended shoulder periods?

In other words, those who currently leave home at 5:00 AM to miss the worst of the

traffic will, in the future, with rail have to leave home at 4:00 AM — or earlier?

If this is the case, why does the City not say so? Or is it once again to avoid any discussion of traffic congestion relative to today’s unbearable levels?

2. Misleading purpose and need statement:

*Congestion 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.*⁸

⁸ <http://isddc.dot.gov/OLPFiles/OST/012988.pdf>

The relevant federal requirements regarding the “purpose and need statement” are as follows:

... the lead agency shall provide an opportunity for involvement by ... the public in defining the purpose and need for a project ... The statement of purpose and need shall include a clear statement of the objectives that the proposed action is intended to achieve ... (SAFETEA-LU Sec. 6002).

"FHWA and FTA review would include making sure that objectives or choices derived from the transportation plan were: based on transportation planning factors established by Federal law; reflect a credible and articulated planning rationale; founded on reliable data; and developed through transportation planning processes meeting FHWA and FTA statutory and regulatory requirements. In addition, the basis for the goals and choices must be documented and included in the NEPA document."⁹ (emphasis added)

Consistent with NEPA, the purpose and need statement should be a statement of a transportation problem, not a specific solution ... A purpose and need statement that yields only one alternative may indicate a purpose and need that is too narrowly defined.¹⁰

The NEPA regulations require that,

Environmental impact statements “shall be written in plain language ... so that ... the public can understand them.”¹¹

The purpose statement in the Draft EIS is presented here in its entirety while the need statement that follows is truncated in the interests of space:

1.7 Purpose of the Project

The purpose of the Honolulu High-Capacity Transit Corridor Project is to provide high-capacity rapid transit in the highly congested east-west transportation corridor between Kapolei and UH Manoa, as specified in the O’ahu Regional Transportation Plan 2030 (ORTP) (O’ahu MPO 2007). The project is intended to provide faster, more reliable public transportation service in the study corridor than can be achieved with buses operating in congested mixed-flow traffic, to provide reliable mobility in areas of the study corridor where people of limited income and an aging population live and to serve rapidly developing areas of the study corridor. The project also would provide additional transit capacity, an alternative to private automobile travel, and improve transit links within the study corridor.

Implementation of the project, in conjunction with other improvements included in the ORTP, would moderate anticipated traffic congestion in the study corridor. (Draft EIS p. 1-19.)

⁹ <http://www.fhwa.dot.gov/hep/plannepa050222.pdf>

¹⁰ <http://edocket.access.gpo.gov/2007/pdf/07-493.pdf> Federal Register / Vol. 72, No. 30 / p. 7282.

¹¹ 40 C.F.R. § 1502.8

1.8 Need for Transit Improvements

There are several needs for transit improvements in the study corridor. These needs are the basis for the following goals:

Improve corridor mobility

Improve corridor travel reliability

Improve access to planned development to support City policy to develop a second urban center

Improve transportation equity (Draft EIS, p. 1-20/21)

The main misrepresentation in this purpose and needs statement is that it is in total conflict with what the public understands. The Draft EIS says that the “purpose and need” is a need for “transit improvements” and the purpose is to build “rapid transit.”

Aside from the misrepresentation the statement is at variance with FTA/FHWA guidance,

Consistent with NEPA, the purpose and need statement should be a statement of a transportation problem, not a specific solution.¹²

The public believes that the purpose of the project is to reduce traffic congestion. This is reinforced in the Draft EIS by the following:

Total congestion would be reduced by 21 to 23 percent with the Build Alternatives.”S-5

“Implementation of the project, in conjunction with other improvements included in the ORTP, would moderate anticipated traffic congestion in the study corridor.” (p.1-19)

The general understanding of the public is that the purpose of the Project is to reduce traffic congestion in the Corridor so it less than today's unbearable levels and also, *incidentally*, provide improved public transportation.

“The statement of purpose and need shall include a clear statement of the objectives that the proposed action is intended to achieve ... ” SAFETEA-LU Sec. 6002.

When does one hear the ordinary citizen use phrases like “Improve corridor mobility,” “Improve corridor travel reliability,” and “moderate anticipated traffic congestion”?

This is jargon for those working in the transportation industry; it is not understood by the average resident unless they habitually parse sentences in City documents. To the average citizen, to moderate or reduce traffic congestion means relative to what they experience today — and not some projected condition in the future unless explicitly told so.

A “clear statement” would say instead that, “It is not the Purpose of the Project to reduce traffic congestion below today's levels, it is to provide an alternative to automobile travel.” That the language is not *a clear statement* understandable to ordinary citizens proves that the process lacks *public involvement*. To *involve* is totally different than to *inform*.

The intent of the statute is for the public to be *involved* and to this end it is essential that the language be clear. Instead, this jargon hulls the average citizen into believing that the primary purpose of the Honolulu High-Capacity Transit Corridor Project is to reduce traffic congestion from current levels.

¹² <http://www.environment.fhwa.dot.gov/strmlng/linkingtrans.asp>

Lacking an FTA definition of *involvement* we have to fall back on the dictionary definition, which tells us that to *involve* is,

- “To engage as a participant; embroil: *involved the bystanders in his dispute with the police.*
- “To connect closely and often incriminatingly; implicate: *evidence that involved the governor in the scandal.*
- “To influence or affect: *The matter is serious because it involves your reputation.*
- “To occupy or engage the interest of: *a story that completely involved me for the rest of the evening.*”¹³

To make clear the distinction: If you are *involved* in a murder, you may be hanged. If you are only *informed* of a murder you will not be.

It is derelict to omit any discussion of traffic relief relative to today’s congestion in the Draft EIS especially since there has been a constant refrain from City officials implying that the purpose and need is for traffic relief.

To be a “clear statement,” the purpose and need statement requires it to say that, “It is not the Purpose of the Project to reduce traffic congestion below today's levels; it is to provide an alternative to automobile travel” and, “After the rail transit line opens, traffic congestion will be worse than it is today, though somewhat less than what it might be otherwise.”

The NEPA regulations require that, “*Environmental impact statements shall be concise, clear, and to the point ...*”¹⁴ and the purpose and need statement is the complete antithesis of this.

3. Renderings misrepresent reality

See this issue covered under [Part II. Insufficient consideration of elevated rail impacts.](#) Pages 2:7

¹³ Excerpted from the American Heritage® Dictionary.

¹⁴ 40CFR1500.2 (b)

February 6, 2009

Part VII — Misrepresentations outside of the Draft EIS

We understand that federal officials do not wish, and are possibly not even empowered, to involve themselves in local politics. However, the current situation concerning the City administration misleading the public is more serious than is usually the case.

When public support for a project has occurred only because of the voluminous amount of lies and misrepresentations made by the local agency, then it is incumbent upon the federal agency to not approve such a project until the situation has been mitigated. Certainly this would accord with the spirit and purpose of the environmental statutes and the responsibility of the lead agency.

For example, the federal government directs the Office of Management and Budget (OMB) to:

*provide policy and procedural guidance to Federal agencies for ensuring and maximizing the quality, objectivity, utility, and integrity of information (including statistical information) disseminated by Federal agencies.*¹

The NEPA statute and associated laws and regulations are replete with language about “objectivity,” “scientific evaluation,” and “integrity.”

What is the point of the lead agency meticulously ensuring that the integrity of information in the Draft EIS (and the thousands of pages of appendices and technical memoranda) which most of the public will never read, if the lead agency then knowingly evades dealing with the fact that the public has been totally misled about the benefits and disbenefits of the project?

Does the agency want an environmentally destructive alternative chosen over an equally effective, but less costly, and less environmentally intrusive one?

Citizens of the City and County of Honolulu have been consistently misled not only by how the Project will reduce traffic congestion, but also the other purported benefits of the rail transit project, such as the presumption of energy savings, the merits of alternatives, the “success” of Mainland public transportation agencies and the dislike of Oahu residents for new highways.

This has not occurred through the occasional “slip of the tongue” statement but by a deliberate coordinated and continuous barrage of half-truths and deception in public meetings, through millions of dollars of media purchases² in TV, radio, newspapers, and in public “bully pulpit” pronouncements by the Mayor, our Congressional delegation, city employees, city transit consultants and their sub-consultants.³

City taxpayers have spent \$2.4 million promoting transit through June 30 last year and we expect that when the final report comes in on their spending before the November 4 election, it will add another million dollars to the City total. In addition, the Mayor spent a great deal of his campaign money promoting his rail idea. Other rail supporters, Go Rail Go, Support Rail Transit, and the Carpenters Union between them spent a total of \$1.1 million promoting rail in the November 4 referendum.

¹ Public Law 106-554; H.R. 5658). Section 515. See <http://www.whitehouse.gov/omb/fedreg/reproducible2.pdf>

² Mayor, rail supporters outspent opponents. Honolulu Advertiser. December 9, 2008.

<http://www.honoluluadvertiser.com/article/20081209/NEWS05/812090355/-1/NEWS05>

³ “Proponents and opponents of Honolulu’s planned \$3.7 billion commuter rail system have saturated Hawai’i airwaves with advertising.” <http://the.honoluluadvertiser.com/article/2008/Jul/29/In/hawaii807290361.html>

A major financial support for Go Rail Go was Parsons Brinckerhoff.⁴ We do not know their total contribution since half of Go Rail Go's contributions were made before the ballot issue was certified and before that time contributions did not have to be enumerated. Countering the over \$5 million spent promoting rail was the puny \$100,000 spent by the Stop Rail Now organization.

Examples of these misleading statements are detailed in Appendix D.

The most important of the misstatements are those relating to traffic congestion. The public believes that the "purpose and need" of the Project is to reduce traffic congestion in the Corridor to less than today's unbearable levels and also, *incidentally*, provide improved public transportation.

As evidence of this, 73 percent of residents in a Honolulu Advertiser poll of July 27, 2008, said they agreed with the statement,

*"We need a light rail system in order to reduce traffic congestion and commute times along H-1"*⁵

Their misunderstanding has been encouraged by our elected officials, their employees and contractors. Their public statements to gain support for rail transit constantly imply, or state outright, that the need is for traffic congestion relief. In his 2008 State of the City speech, the Mayor said, "traffic congestion is the most significant challenge to our quality of life."⁶ And in a policy statement, "Our residents ... are crying for relief from traffic congestion."⁷

Our elected officials (and the public) know precisely what is needed for "improving transportation conditions."

City accuses us of lies and misrepresentations:

The City Administration's Transportation Director Wayne Yoshioka⁸ took the position that the opposition (Stop Rail Now and Honolulutraffic.com) was putting out so many "lies and misrepresentations" that the city had to respond to this 'misleading and false information' with the truth." He added that "most of their statements are not true."

This was the most outrageous action by the City yet. On September 3, 2008, the City Council's Executive Matters Committee discussed a bill that would restrict the use of taxpayer funds for advocacy of rail transit by the Administration.

We responded that all Honolulutraffic.com's information was footnoted and sourced and if anyone is lying it is the city.

Yoshioka was unwilling to specify what our lies and misinformation were but the Committee Chair eventually persuaded him to agree to supply a list of 20 such "lies and misrepresentations" within five working days. Fortunately, all of [this is on video](#). Three weeks later he produced them.

There is nothing in the list he produced that could reasonably be called a lie or misrepresentation. For example, he states that our comment, "The city admits future traffic congestion will be worse

⁴ <http://www.honoluluadvertiser.com/article/20081209/NEWS05/812090355/-1/NEWS05>

Also see the Campaign Spending Commission Reports: <https://nc.csc.hawaii.gov/NCFSPublic/ReportList.php>

⁵ www.honolulutraffic.com/HADV_poll_p9.pdf

⁶ <http://www.co.honolulu.hi.us/mayor/soc2008.pdf>

⁷ <http://www.honolulu.gov/refs/csd/publiccom/honnews06/mayorofferscompromiseontransittaximasse.htm>

⁸ Since it is a two hour tape we have provided a time line in hours and minutes below:

0:24 — DTS Director Yoshioka begins testimony on bill 01-189 regarding rail transit advocacy.

1:08 — Corporation counsel begins testimony.

1:32 — Cliff Slater begins testimony.

1:40 — Council begins discussion and with legal counsel.

2:08 — End of proceedings.

with rail than it is today” was, “... a cleverly crafted statement that knowingly uses only part of the information available. The Alternatives Analysis shows that a fixed guideway will reduce future traffic congestion between Kapolei and Honolulu by 11 percent.”

This is pure spin. He is not denying that traffic congestion will be worse in the future with rail than it is today, only that it will be 11 percent better than it would be without rail. In fact, he and Mike Schneider of InfraConsult finally admitted we were right during a debate on KHVH radio some weeks later. The crucial [four minute clip](#) of this admission is available. We have detailed [our responses](#) to this and all his other charges in Appendix D.

The issue regarding spin, lies and misrepresentation is that it has been used to garner support for rail. The culmination was that after all this the City could only get 50.4 percent of the voters to approve the rail referendum. It begs the question of what would have been the support if the City had told the truth.

While strictly speaking these misrepresentations are not part of the NEPA EIS process, these misleading activities by Hawaii government officials are of great import. It is one matter to attempt to ensure accuracy and objectivity in the Draft EIS, but can a federal agency evade evidence of local government actions that seek to undermine the EIS process?

What is the point of following the NEPA process to the letter and spirit of the law when local political authorities and their campaign contributors, consultants and all their employees are conspiring to undermine the NEPA process by spending literally millions of dollars lying about traffic congestion relief, among other matters? When Parsons Brinckerhoff is giving \$25,000 to fund Go Rail Go efforts to persuade voters to vote for rail with gross misrepresentations of the facts?

It is one thing that the FTA not involve itself in local political matters but it is quite another when their own federal environmental process is being undermined. It is not being ignored — because FTA is fully aware of what has transpired. Rather, the undermining of the process is being evaded.

Appendix D

Following are a few examples of the many claims of prospective traffic relief offered by the City administration.

Mayor Hannemann, KGMB interview, 10/30/2008, “People are tired of being stuck in traffic and they want solutions.”

Bill Brennan op/ed in Hawaii Reporter 6/26/08. "Cities with large, well-established rail systems have significantly .. , less traffic congestion ... A comprehensive rail transit system can reduce per capita congestion delays by half, and even greater reductions probably occur on specific corridors." <http://www.hawaiiireporter.com/story.aspx?6847fd0b-ddce-41c1-82e9-3dcd7335de50>

Mayor Hannemann's 2008 State of the City Address, "I've said time and time again that traffic congestion is the most significant challenge to our quality of life ... the fixed guideway presented the most effective means of relieving traffic congestion and accommodating the anticipated growth in West and Central Oahu.

Mayor Hannemann said, "Our residents, particularly those in Leeward and Central Oahu, are crying for relief from traffic congestion. A mass transit system represents our best near- and long-term solution to this worsening problem and I'd hate to see our efforts derailed because of

disagreements over who-does-what any delays in implementing the tax and completing our planning will delay relief for tens of thousands of commuters who are squandering hours of precious time in traffic." City Hall press release: Mayor offers compromise on transit tax impasse. June 21, 2006.

<http://www.honolulu.gov/refs/csd/publiccom/honnews06/mayorofferscompromiseontransitaximpassse.htm>

This video of Mayor Hannemann and Rep. Neil Abercrombie's city hall "Traffic sucks!" rally held on December 5th, 2005, typifies the grossly misleading statements emanating from our elected officials.

<http://mfile.akamai.com/12891/wmv/vod.ibsys.com/2005/0707/4695365.200k.asx>

"[Hannemann] said the [rail] system will help all parts of the island, easing traffic overall because 'there'll be less cars on the road. '"

<http://the.honoluluadvertiser.com/article/2005/May/12/In/In02p.html>

Mayor's Press Secretary: "Slater misrepresents just about everything Mayor Mufi Hannemann, Transportation Services Director Ed Hirata and other supporters of transit have said, from the timing of federal requirements to tax calculations, highway capacity and a rail system's potential to ease traffic congestion."

<http://the.honoluluadvertiser.com/article/2005/Aug/10/op/508100321.html>

"We're poised to break ground for a long-awaited fixed guideway system that will reduce the time commuters spend in their cars and away from their families ... " Mayor Hannemann, editorial, Honolulu Advertiser, June 29, 2008, Living Green section.

"Mayor Mufi Hannemann chided Lingle at the rally and said the city needs a rail system to alleviate increasing traffic congestion. U.S. Rep. Neil Abercrombie, D-Hawaii, also blasted a possible veto and said that he and the rest of Hawaii have had enough of the traffic problems. He said commuters are fed up and don't need any more "Lingle lanes" filled with traffic congestion."

<http://www.bizjournals.com/pacific/stories/2005/07/04/daily18.html?t=printable>

"How does rail transit help reduce traffic congestion? ... Building rail transit now is the most cost-effective way to avoid even more congestion in the future ... This brochure is provided by the City & County of Honolulu as part of the public information program required by the Federal Transportation (sic) Administration." City's 8-page II" x 12" full color glossy brochure inserted in the Honolulu Advertiser, Honolulu Star-Bulletin and the weekly, Mid-Week, circa. October 19, 2008. Combined circulation was about 500,000. To add insult to injury the brochure was marked, "Paid for by City taxpayers."

"The [rail] project shrinks future traffic congestion by more than 20 percent." Mayor Hannemann quoted in the Honolulu Advertiser on November 2, 2008, under a bold above the fold headline, "Study predicts rail to ease traffic 23%". Honolulu Advertiser, November 2, 2008. p. A1

"Rail transit can improve the quality of life for residents across O'ahu by reducing traffic congestion ... and will shrink traffic congestion by at least 21 percent as it matures ... my hope is that this is an action we collectively take for the future — for the generations of children to come who deserve an island home where they can live, work and raise their families free from the grind of constant traffic gridlock." Senator Daniel K. Inouye. *Draft EIS bodes well for transit*. Honolulu Advertiser, November 2, 2008. p. B1.

"What's more, today's rail technology is already proven and successful, like Vancouver's SkyTrain, the Trax system in Salt Lake City, Portland's MAX Train, and the Washington, D.C. Metro. When each of these systems was first proposed, there were questions and concerns raised. But today, they are vital parts of their cities' overall transportation solutions: reducing traffic ... "

Radio commercials repeated this endlessly in the weeks leading up to the November 4 rail referendum. Of course, the facts are that traffic congestion in these cities since they built rail is as bad as other cities – if not worse, according to the Texas Transportation Institute.

The Mayor's behavior during the 2008 mayoral candidates' debates exemplified the refusal of city officials and their contractors to admit that traffic congestion will get worse with rail. During the September 9 debate, Dr. Panos Prevedouros asked the Mayor, "Your own city studies show that traffic congestion in the future, with rail, will be far worse than it is today. Is that true? Yes or No?" The Mayor totally dodged this because he knows full well that the answer is "Yes" but the viewers did not know that traffic congestion will indeed get worse with rail. [Watch him duck and dive during this video.](#)

Other aspects of misrepresentations by the city during the rail transit debate follow:

The following transcript is of a one-minute City radio commercial that ran incessantly on many Honolulu radio stations in the months leading up to the referendum vote:

TRANSCRIPT: *"Will mass transit attract riders in Honolulu? Actually, we already know the answer. Honolulu has the fourth highest transit ridership per capita in the nation. People here already know that mass transit, like the bus, is a great way to deal with traffic, parking and save money. So, how about rail transit, which will be even faster and more efficient? Again, we don't have to guess. Look at how people in cities nationwide are responding to fuel costs and traffic hassles. In Portland, San Francisco, New York and Washington, D.C., rail ridership has increased more than five percent in the last year. In Los Angeles, a city that loves its cars, rail ridership is up over fifteen percent. In Seattle, it's up twenty-eight percent. In Charlotte, thirty-four percent. And in Sacramento, rail ridership has increased forty-three percent in just a year. It's too bad we don't already have rail transit. The next best thing we can do is start building it now. To learn more, visit Honolulu Transit.org."*

The above statistics were repeated in the City's newspaper advertising. For example, the Honolulu Star-Bulletin, October 14, 2008.

The following paragraphs show the city's statement numbered and in quotes followed by our comments. Our data is drawn from the American Public Transportation Association (APTA) website. For comparison calendar years 2007 vs. 2006, the file is found at <http://www.apta.com/research/stats/ridership/riderep/documents/07q4rep.pdf> The latest available data is that of the 1st quarter of 2008 and the file comparing it with the same quarter of 2007 is at: <http://www.apta.com/research/stats/ridership/riderep/documents/08q1rep.pdf>

#1: "In Los Angeles, a city that loves its cars, rail ridership is up over fifteen percent."

For 2007 versus 2006, total public transportation in Los Angeles was down 1.78 percent, heavy rail was up 2.03 percent, light rail was up 0.81 percent and buses were down 2.53 percent. For the first quarter 2008, heavy rail was up 5.37 percent, light rail was up 1.77 percent and bus ridership was down about 7 percent (two categories). Los Angeles total public transportation was down 4.57 percent.

#2: "In Seattle, [rail ridership] it's up twenty-eight percent."

This is a statement that is accurate but misleading. For 2007, Seattle's light rail was up 3.8 percent and commuter rail commuter rail (*real trains, long distance between stops*) is up 27 percent, but it is a minor issue since it carries just 1.5 percent of all public transportation in Seattle. The primary reason for the great increase in this minor commuter rail line is that there have been extensive increases in commuter rail service during the past two years. See: http://en.wikipedia.org/wiki/Sounder_commuter_rail

#3: “In Charlotte, [rail ridership is up] thirty-four percent.”

Charlotte’s rail line did not open until November 2007 and so there is nothing to compare it to. The supposed 34 percent increase is a pure figment of someone’s imagination.

#4: “And in Sacramento, rail ridership has increased forty-three percent in just a year.”

For the year 2007, Sacramento’s rail was up 1.41 percent over the prior year. For the first quarter of 2008 rail was up 3.12 percent.

The above statements are not only inaccurate but they mislead citizens into believing that recent increases in gasoline prices have driven motorists to public transportation far more than they actually have. The national experience is that the first quarter of 2008 shows a 3.3 percent increase in boardings over the year earlier quarter. Some cities were up slightly more, while others experienced declines.

Source: http://www.apta.com/media/releases/080602_ridership_report.cfm

The City repeated these data in ads placed in local newspapers in 2008, for example, in the Honolulu Advertiser, October 13, 2008, p. A9. And since our local newspapers will print the City’s official line without any research whatsoever this gets repeated, as for example, in the main editorial of May 15, 2008.

InfraConsult LLC is a consultant to the city whose management is comprised of former Parsons Brinckerhoff employees. They run the “Public Outreach Program” for which they hired Elisa Yadao for \$500,000 as its program manager.

Dr Prevedouros had written a paper on 20 reasons why we should choose bus technology. That was criticized by InfraConsult’s Managing Director, Michael Schneider, and below we comment on his criticism. The more egregious of his misleading comments are shown below as EXCERPT followed by OUR COMMENT.

EXCERPT: *“Virtually every city in the U.S. with a population over 750,000 people has both buses and some form of rail technology in operation, construction, or in the advanced planning stage... Every major city in the world, whether a “capital city” or not, has some form of rail system. The size of the rail system planned for Honolulu is appropriate for the community’s size.”*

OUR COMMENT: The spin here is to use the term “city” whereas all normal discussions of rail systems use “metro area” or “urban area,” which are contiguous urban areas almost regardless of political division. Thus, the San Francisco Bay Area contains all of the contiguous urban areas within the Bay Area. Portland’s urban area consists of Portland and the surrounding counties.

When we review Honolulu’s size relative to other metro areas we find that we are the 56th largest in the U.S. and that if we were to build any kind of rail line we would be the smallest in population size. In fact, most of the metro areas larger than Honolulu do not have rail lines.⁹

The next largest city that has a totally grade-separated rail line powered from a third rail, usually termed ‘heavy rail,’ is Miami whose population is more than four times that of Honolulu.

The other issue of appropriateness is that of cost. The cost of the proposed Honolulu rail line is out of all proportion to the population and tax base. The table on page 24 shows the relative local tax burden falling on Oahu taxpayers as compared to other communities. Honolulu will likely receive only about 18 percent of capital costs from federal funding.

⁹ [List of the 60 largest U.S. Metropolitan Areas from the 2000 Census](#). Some three more metro areas have added rail since the chart was prepared but that does not change the statement.

As the primary consultants, Parsons Brinckerhoff has been active in spreading misinformation about rail on various radio programs.

For example, on this radio program, Parsons Brinckerhoff's Steve Hogan discussed transit with Dr. Prevedouros, UH Professor of Traffic Engineering, on the Rick Hamada Show on KHVH 830 AM for an hour on May 12, 2008. The full discussion may be heard on [the podcast made of it](#).

During the radio program Hogan said that it took six lanes of freeway to have the same carrying capacity as rail transit.

Our comment: A single lane of busway on the New Jersey I-495 carries 32,000 passengers on buses per hour during the peak hours.¹⁰ This lane carries more passengers per hour than any rail line in the U.S. with the sole exception of one line of the New York City subway. So it is nonsense to talk about rail having more capacity than Bus/Rapid Transit.

Further, Parson's Brinckerhoff's own *HOV Manual* says:

"(This) comparison of person moving capacities for various U.S. rail and HOV projects...appears to cut through the myth that HOV facilities (e.g. busways) do not have the person carrying equivalent of rail lines. Both modes can serve the person carrying capacity needs of about any corridor in North America."¹¹

Hogan then argued that there was no space to put the HOT lanes in Honolulu.

Our comment: Parsons Brinckerhoff designed the Managed Lane Alternative and included it in the Alternatives Analysis with maps and engineering drawings showing that it fit.

Hogan later tried to belittle the multiple on/off ramps Dr. Prevedouros has proposed for the HOT BRT alternative by saying that on the Tampa Expressway there's no stopping after you get on, until you get off at the other end.

Our comment: The fact is that the Tampa Expressway has multiple on/off ramps and a map of them may be seen on [the on/off ramps page](#). The Expressway's Director of Planning sees no difficulty with having even more on/off ramps.

Then Steve Hogan argued that rail is more fuel efficient than autos on HOT lanes.

Our comment: Only when New York City subways are included using weighted averages do rail transit lines show as more energy-efficient than cars. See the arguments on this issue on page xxx

The efficient systems, such as New York, have a great deal of traffic going in both directions in their core areas in the off-peak while the energy-inefficient systems, such as Miami, tend to be those that are highly directional during the peak hours — full going from suburbs into town in the morning and empty going back out, with the opposite being true in the afternoon while there is little traffic during the middle of the day.

For a meaningful assessment of what Honolulu is likely to experience we must look at the experience of those modern systems built since 1970.

The average rail line is less energy efficient than the automobile (3,496 for cars and 4,329 for light trucks and SUVs) according to the U.S Department of Energy as shown and described in the chart to the left¹² and in other DOE publications.¹³

¹⁰ Transportation Research Board's Highway Capacity Manual. Table 1-13.

¹¹ Charles A. Fuhs. *High Occupancy Vehicle Facilities*. Parsons, Brinckerhoff. December 1990.

¹² http://www1.eere.energy.gov/vehiclesandfuels/facts/favorites/fcvt_fotw221.html

http://www.carkeys.co.uk/road_test/hyundai/14074.asp

¹³ http://cta.oml.gov/data/tedb27/Edition27_Chapter02.pdf Tables 2.12 & 2.13

While it is still possible that Honolulu's prospective rail line could be more efficient than an automobile this is not likely. It is especially unlikely when the target year for discussion is 2030 and automobiles are getting far more fuel efficient every year and trains are not.

Then Hogan said that even in Tampa the Expressway would today cost 3.5 times what it originally cost to build.

Our comment: There are multiple construction cost indices, such as the Corps of Engineers Civil Works Index for Roads and Bridges, covering Florida from 2003-2008 and none of them show anything higher than a 50 percent increase. In addition, the Figg Bridge Corporation has been recently estimating new facilities in Florida similar to the Tampa Expressway and their current projected costs are less than a 50 percent increase from what the Expressway actually cost. A 350 percent increase is nonsense; it is simply Parsons Brinckerhoff's attempt to justify the preposterously high projected cost of \$2.6 billion that Parsons Brinckerhoff used for the MLA.

Anyone believing that Parson's Brinckerhoff's employees are reasonable and objective in informing the public about rail transit and the Managed Lane Alternative should hear the [PODCAST](#) of this Rick Hamada Show.

City brochure misleads

The city's widely distributed May 2008 Transit brochure is grossly misleading.. The city prints thousands of these transportation brochures and distributes them to a city wide mailing list in addition to placing it on their website www.honolulutraffic.com. Following are our comments on the [City's May transportation brochure](#) (takes time to download).

Front page: Top reasons for rail:

EXCERPT: Good for MOBILITY -- One train can move 300 people which equals 6 buses or 300 cars! That means one rail line equals 6 lanes of cars.

OUR RESPONSE: We dealt with this canard in earlier pages.

EXCERPT: Good for the ENVIRONMENT -- It's sustainable - rail can be powered by alternative energy like solar, wind or H-power. This means less air and water pollution and fewer green house gas emissions.

This is a typical environmental appeal which has no substance in fact. As proof of that, there is no mention of these potential power sources in either the Draft EIS or its supporting technical documents. It is another case of spin being good enough for local consumption but not valid enough for submission to the FTA.

EXCERPT: Good for the ECONOMY -- The rail project will create 90,000 person years of employment or 11,000 direct and indirect jobs annually. And, building a reliable, dependable, efficient transportation system encourages healthy economic growth.

OUR RESPONSE: 82 percent of the capital cost and 100 percent of the operating losses will be funded with local dollars. No mention is made of the downside of incurring higher taxes and higher City debt to justify a make-work project.

EXCERPT: Good for COMMUNITIES -- Rail encourages managed, orderly growth along the route. Planning where and how communities expand means we can keep the country country.

OUR RESPONSE: It really means Transit Oriented Development, or heavy subsidies for developers, which has been the case in every other TOD; the subsidies are needed to entice people to live in so-called "vibrant" communities. No mention is made about the subsidies needed and their effect on local taxes.

EXCERPT: “[Houston] Metro says ridership on its light rail system has doubled in 20 months.”

OUR RESPONSE – The American Public Transportation Association shows ridership on Houston’s light rail was up 6.29 percent 2007 over 2006 and up just 3.08 percent for the 1st Quarter 2008 over the same quarter in 2007. Some doubling.

"The Dallas DART is up 9%. In Los Angeles - a city that loves its cars - rail ridership is up over 15%. In Seattle it's up 28%, in Charlotte 34%, and in Sacramento, rail ridership is up 43% in just a year. Across the country rail ridership is up 11.2%." City advertisement, "Paid for by City Taxpayers," in the Honolulu Advertiser, October 13, 2008. p. A9.

Since our local newspapers will print the City's official line verbatim without any research whatsoever, these untruths are repeated, for example, in the Advertiser main editorial of May 15, 2008.

Stop Rail Now’s so-called “Lies and Misrepresentations”

This refers to the discussion on page 38 when the City accused Stop Rail Now and Honolulutraffic.com on statewide television of disseminating “lies and misrepresentations.” When they finally presented the list to the City Council they called it “Inaccuracies.”

The City’s listing of our sister operation Stop Rail Now’s supposed “lies and misrepresentations” are in larger type bold-faced and flush left. The City’s response to our comments is shown underneath each of them. Our responses are shown underneath each of the items but are in small type and indented. We have listed here only those “lies and misrepresentations” attributed to Stop Rail Now.

This exchange took place before the Draft EIS had issued and so our comments related to that time and the Alternatives Analysis.

The following retains the City’s original format:

Inaccuracies

Stop Rail Now Ad

Sunday, September 14, 2008 • Honolulu Advertiser • Page A25

1. "The recent GET Tax increase and federal funds will be insufficient to fund rail."

Through the financial plan in the Alternatives Analysis, adequate funding sources have been identified for the approved Kapolei to Honolulu route. The financial plan also includes almost \$1 billion in contingencies. The financial plan was thoroughly reviewed by transportation experts with the Federal Transportation Administration (FTA) prior to its release.

There are five reasons for believing the funds will be insufficient:

First, the projected revenues from the GE tax hike will most probably fall short over the 15-year life of the tax given the current state of our economy. They will certainly be no more than that shown as the lower of the three growth scenarios, the “Trend Forecast,” in the AA, table 5-4 & 5-7.

Second, the Alternatives Analysis (AA) financial plan, Table 5-8 and the [Financial Feasibility Report](#) (FFR) p. 4-4, calls for \$1.2 billion in federal funds for the 20-mile option using the Trend Forecast for GE tax revenues.

The fed does not deal in inflation adjusted dollars only nominal dollars. There is no likelihood of us receiving \$1.2 billion. In fact, the only FTA assurance that we have in writing is the minutes of an OMPO Policy Committee Meeting (see <http://oahumpo.org/PC/pc2004/pc04mm0323.html>) where Mr. Rogers, head of FTA's Region IX told the Committee that, "The FTA program office is looking to limit any New Starts funding to no more than \$500 million per project." The minutes were accepted as true by the Committee members. This is the only written assurance from the FTA of us getting anything.

An email of 10-7-2008, from the FTA's Paul Griffo to us, reads as follows: "It is far too early to tell whether Honolulu's proposed rail project will receive New Starts funding. The project hasn't yet been accepted into the New Starts Program. "

Third, the plan does not call for operating losses to begin until 2019 (www.honolulutraffic.com/FFR.pdf, p. B-4.). However, according to city officials, plans call for operations to start in 2012. If operations do begin earlier it will increase the subsidies shown in the financial plan.

Fourth, the capital cost estimate for the 20-mile line is about one billion understated and the 28-mile by \$2 billion. See www.honolulutraffic.com/costunderstate4.pdf for a discussion of the 1992 rail project, the Miami Metrorail and the San Juan Tren Urbano all adjusted for construction inflation and location.

Fifth, there will likely be change orders and other cost overruns. The average of the most recent [FTA evaluation of New Starts Actual versus Projections and Costs](#) showed average cost overruns of 40 percent.

That the "financial plan was thoroughly reviewed by transportation experts with the FTA prior to its release" is no assurance to anyone who has the slightest acquaintance with the FTA's record. The last two rail lines to open, Charlotte and San Juan, both went over 100 percent over projected costs.

2. "For the beginning 20-mile line we are unlikely to get all of the supposed \$900 million in federal funds."

The Federal Transit Administration would not have allowed the City to continue with the project if it were not a reasonable estimate. In fact, in the Alternatives Analysis, it was assumed that federal funds would total \$700 million. If we receive more, it will be a bonus.

Congressman James Oberstar, chair of the U.S. House Transportation and Infrastructure Committee has twice told the local media he strongly supports this project and mentioned \$900 million as a reasonable figure.

2. Dealt with above.

3. "This amount together with the operating subsidy will take at least a 40 percent hike in property taxes."

This is a scare tactic. The subsidy for rail could be funded without any increase in taxes, property or otherwise.

Our statement related to the full Locally Preferred Alternative (LPA) and included operating losses. We estimate that the City's projected cost of the Full Corridor Alignment at \$5.1 billion in 2006 dollars (AA, table 5-1) is \$2 billion understated (see www.honolulutraffic.com/costunderstate4.pdf) and to that must be added the airport spur bringing the total to \$7.5 billion. This will take more than a 40 percent hike in property taxes. See <http://www.honolulutraffic.com/railfunding13.pdf> which is a spreadsheet using an earlier estimate of \$6.4 billion that resulted in a 40 percent hike in property taxes. If the City wishes to disagree, they should be specific.

4. "Automobiles are on average more energy efficient than modern rail lines."

According to the U.S. Department of Energy's 2007 Data Book, rail uses 36 percent less energy per passenger-mile than cars and trucks.

This attempt to confuse the average of rail lines with the *weighted* average of all rail lines, which includes New York, is quite deliberate. They know that New York City's energy efficient subways provide 57 percent of the nation's rail transit ridership and dominate the *weighted* average. We should be comparing ourselves to rail technologies similar to what we would be getting. In fact, whether you take just modern rail lines, or all rail lines including New York City, but use a straight average instead of a weighted average the automobile still comes out ahead with Btu's per passenger mile of 3,445 versus rail's 4,337. They know we are right on this. See this web page: <http://www.stoprailnow.com/nwsubenergyuse.pdf>.

5. "The city admits future traffic congestion will be worse with rail than it is today."

This is a cleverly crafted statement that knowingly uses only part of the information available. The Alternatives Analysis shows that a fixed guideway will reduce future traffic congestion between Kapolei and Honolulu by 11 percent.

This is pure spin. He is not denying that traffic congestion will be worse than today only that rail will reduce congestion by 11 percent from what it would be without rail.

6. "The city's own Parsons Brinckerhoff studies forecast that with rail, rush hour traffic will be 37% greater than it is today."

This is another cleverly crafted statement that uses only part of the information available. With the expected increases in population and employment in the future, rail transit promises the greatest reduction of this increased congestion.

More spin; he is still not denying that congestion will be worse with rail than it is today.

7. "Bus Rapid Transit and autos on High Occupancy Toll 'HOT LANES' is [sic] the most cost-effective way to reduce congestion and thus reduce pollution and energy use."

This statement has no basis in fact. The Alternatives Analysis compared the costs per users of Managed Lanes and the 20-mile fixed guideway and found that the Managed Lane is between \$63 and \$50 per user, while the fixed guideway is about \$21 per user.

In addition, Managed Lanes would provide approximately 2 million hours of user benefits per year. The 20-mile fixed guideway would provide approximately 12

million hours of user benefits per year. Page 6-6 of the Alternatives Analysis states, "The Fixed Guideway alternative is approximately four times as effective at providing transit user benefits per annualized incremental dollar cost as the Managed Lane alternative."

Our statement refers to the detailed findings of the UHCS Study, which the city has made no attempt to refute. All they have done is personally attack Dr. Prevedourous who led the study. Failing any significant analysis of the UHCS Study by the City we will continue to quote it.

GETTING IT RIGHT

Misinformation about rail

Below are inaccurate statements about rail transit and HOT lanes taken from their source websites. The statements are grouped by category: traffic congestion, financial plan-costs, Managed Lanes-HOT lanes, ridership, travel times, Environmental Impact Statement, population, train speed, route, environment, downtown and Phileas buses.

TRAFFIC CONGESTION

"You may be even more outraged to find that it has never been our elected officials intention to improve traffic congestion." (stoprailnow.com)

One of the goals from the beginning has been to reduce traffic congestion and improve **corridor mobility, which includes reducing travel times and improving travel time reliability.**

Nowhere in the AA is there any sign of intent to reduce traffic congestion below current levels, only to "increase urban mobility" by which they mean by public transportation.

These excerpts from a letter sent by DTS Director Melvin Kaku to Cliff Slater on June 20, 2006, show that the City did not have congestion reduction as a main requirement:

"Projects with the purpose of providing roadway mobility for automobiles and commercial vehicles are outside of the authorization of Act 247; therefore, they will not be considered for the Honolulu High-Capacity Transit Corridor Project ...

"While the transit system will reduce the number of drivers on congested roadways within the corridor, the corridor is expected to continue experiencing growth in travel demand. The transportation corridor between Kapolei and the University of Hawaii at Manoa will continue to experience substantial traffic congestion; however, congestion in the corridor is expected to decrease somewhat after the system opens, and grow at a reduced rate after that time because of automobile trips diverted to transit."

All the City hopes to do is to use rail to reduce congestion to levels below what they would be if we did nothing. The AA table 3-12 shows that present peak hour levels on the regular H-1 freeway lanes are 10,960 vehicles. If we build rail the city forecasts 17,414. That will mean a considerable increase in traffic congestion relative to today's levels. If we do nothing (No-Build Alternative), the demand will only increase to 18,049.

FINANCIAL PLAN-COSTS

"Even if Honolulu receives \$900 million in federal aid, all of it will be spent in foreign countries or on the mainland. No federal funds will ever reach Oahu." (stoprailnow.com)

This statement is absurd. The largest cost elements of the project are the construction of the guideway, stations and maintenance facility and associated costs for utility relocations and street repaving. All of this work, of course, will be done on-site in Honolulu, as will most of the professional service activities.

Stop Rail Now finds no record of us saying this. However, it may well be true it is just that we have not researched this issue.

The City cannot afford rail because it will cost \$150 million a year to operate and maintain." (stoprailnow.com)

The estimated annual operating and maintenance costs for a fixed guideway are approximately \$60 million. The cost of operating and maintaining a bus and rail system will be less than the cost of carrying the same number of riders on a bus only system.

We can find no record of us having said this. However, it may well be true; we have yet to research it.

MANAGED LANES-HOT LANES

"Engineers for the Tampa elevated toll lanes say an elevated toll road can be built in Honolulu for less than \$1 billion." (stoprailnow.com)

According to an e-mail from Linda Figg, whose firm designed the Tampa project, "We (Figg Engineering) have not done any "detailed engineering studies" of what estimates of probable construction costs would be for the elevated structure."

"We simply took those actual cost figures (from Tampa) and escalated the costs to today's time and included the escalations that might be anticipated for construction in Hawaii. The values that Cliff Slater is referencing look like the ball park figures that we determined from that back of the napkin review."

What they precisely said was that they could not believe that it would cost as much as one billion dollars. Figg Bridge does other work in Hawaii and is familiar with geotechnical and labor conditions. They are also familiar with the proposed route of the HOT lanes proposal. Given that they are not going to perform "detailed engineering studies" for the city for free, their comments are valid and we think reasonable.

"In the 2006 AA, 10-mile Hot Lane performed only a little worse than 20 miles of rail line." (stoprailnow.com)

The fixed guideway is projected to reduce traffic congestion by about 11 percent in the study corridor. The Managed Lane-HOT lane option reduces future traffic congestion by about 4 percent. The fixed guideway is a more cost-effective solution per user benefit than Managed Lanes-HOT lanes (AA, table 6-1).

We can find no record of this poorly written sentence coming from us.

**"HOT lanes pay for themselves with toll revenues and federal funds."
(various)**

Toll revenues would fund only about 20 to 25 percent of the cost of HOT lanes. No other funding sources have been identified.

We see no reason why toll revenues cannot provide half of the \$900 million capital costs and FHWA the other half. Even if FHWA did not fund it, the local taxpayer load \$450 million is so incomparably small relative to rail transit that the city could have the state legislature amend Act 247 to allow its use for HOT lanes and still be able to terminate the tax in about four years.

POPULATION

**"The rail project is totally out of line for the size of our community."
(stoprailnow)**

Honolulu is fifth densest among cities with populations of 500,000 or more. We are the only one without a rail system.

More spin. No one compares "cities" but rather metro areas — contiguous urban areas with logical linkage for sharing urban transportation. Rather than San Francisco the federal government reviews the whole Bay Area. The USDOT's listing of metro areas has Honolulu as the 56th largest and most of the 55 that are larger than us have no rail.

In addition, rail transit's cost per capita for Honolulu is at least seven times the next highest cost per capita among all metro areas and ten times the average.

TRAIN SPEED

"Train is not rapid." (stoprailnow.com)

Rail will achieve a top speed of 55 mph or greater between many stations.

More spin. We, of course, only deal with average speeds from origin to destination. The city claims they will average 30 mph but that will be a reach and be, more likely, 25-28 mph. In any case, 30 mph is not rapid in comparison to uncongested highway speeds of 60 mph such as the HOT lanes would provide.

ROUTE

**"Virtually everyone will have to use buses to get to rail stations.
(stoprailnow.com)"**

Rail stations will [be] accessible by automobile, bus, bicycle paths and walkways. In the transit corridor, 23 percent of the population and 38 percent of the employment will be within a 10-minute walk of a rail station.

We do not find it credible that 23 percent of the corridor population will be within a ten minute walk from a station. We will ignore for a moment that a quarter mile is considered by the feds to be the maximum that people will walk to station or bus.

However, we have not made a detailed study of this and if the city has, we will be happy to review it with them and concede that they are right should that turn out to be the case.

**"They are delaying the theoretical opening until 2019."
(stoprailnow.com)**

The projected opening is 2018.

The [City's AA Financial Feasibility Report](#), Table B-4, shows that operating and maintenance costs for the 20-mile project begins in 2019, while the full length system begins in 2020 (Table B-5).

ENVIRONMENT

**"The noise from steel on steel is an environmental blight."
(stoprailnow.com)**

Rail decibel levels are about the same sound as a city bus.

Yes buses are noisy. However, rail has a particularly annoying sound that at 79 decibels @ 50 feet coming by every 1½ minutes, in addition to buses and other ambient noise, makes the situation far worse.

Hirata, Gregg

From: Albert James Del Rio [ajbert.delrio@hawaiiantel.net]
Sent: Friday, February 06, 2009 10:02 AM
To: Mayor Mufi Hannemann
Cc: Albert James Del Rio
Subject: draft eis comments transit

Comments re: Draft EIS Honolulu High Capacity Corridor Project

Flawed selection and alternative process: Public not consulted in the development of route alternatives or type of plan. Toll lanes could accommodate bus, taxi, tour bus, handicap vans, emergency vehicles, and enforcement, and be utilized 24 hours a day instead of mostly peak hours. The toll alternative would be viable only if multipurpose and flowed to university, and Waikiki, and tie into the windward, and eastward traffic. Alternatives to split ewa and central traffic flows, and to facilitate Pali, Like Like, and H1 east have not developed or pursued.

Existing and future transit populations neglected. The Dillingham and Kakaako route flow through low population light industrial in Kalihi, and future middle to high income residential in the urban core kakaako. A Waipahu, pearl city, pearl ridge, Salt lake boulevard, king street, olomea, vineyard, punchbowl, king, to university route, with spurs to the airport, Waikiki by university avenue or kalakaua with connection to Ala moana and the convention center would serve the highest existing and future low and moderate income residential, and tourist populations. A king vineyard route, weather multipurpose or single use, ties in fluidly with windward and eastward traffic, reaches the legislature, city council, courts, state and county services, provides healthcare alternatives at Straub, Kuakini, Queens, and Kaiser hospitals, offers greater access to university and college resources, access to entertainment venues like blaisdell has the most development potential along streets with ample room for additional private and public transportation, possesses existing excess capacity and right of ways, is the most direct route, and would bring tourist directly to the capital, historic, and arts district.

Rail oriented cities developed around historic freight and passenger rail with links to intercity and interstate rail lines. A king street orientation could be an inner city backbone and effectively facilitate inner city passengers within and to the urban core. Intercity extensions to central or ewa and leeward could be secondary. The most congested area is from Pearl City to University, the primary urban core. Park and ride at Pearl city juncture could aid feeder buses to a multi purpose toll, bus, or rail.

Major populations excluded. No plan considers the future and existing population in Central Oahu (planned for thousands of residences), or the isolated low to moderate income public transit intensive Leeward coast. The Kapolei portion is inferior to a King, university route where multifamily low to middle income populations already reside and are bordered by high density underutilized residential and mixed use zoned real estate. Future middle to high income single family suburban communities in Central and Ewa plains will be two to three car households as they mature, and are not typical public transit intensive communities. Windward, and eastward traffic is completely ignored. Kapolei route may provide developers the infrastructure for rapid urbanization of the ewa plain.

Full utilization of rail capacity will not likely be achieved with projected population of 1.13 million by 2035, a maximum honolulu population of 1.5m or 2m at most, and projected populations far below comparable rail oriented cities. Riders will at first be intercity displaced bus riders, with the remaining rider predictions questionable. Inner city transport will not be served by the current choice. The cost of an additional transit authority has not been determined. The city is unable to maintain its existing infrastructure. Higher subsidies and fees for the bus and the rail seem likely. A multipurpose elevated toll, bus, or rail could generate additional revenue and provide flexibility.

Lack of coordination between city and state to resolve congestion.
insufficient plan to accommodate existing automobiles and additional 100,000 or more cars

by 2035, and county failure to utilize existing capacity and to complete arterial lane improvements, are the most pressing quality of life and productivity issues facing the island of oahu.

Federal funds should be devoted to the highest volume transit projects, and possibly ones that have sought and obtained private investors. Projects that accelerate urban sprawl and exacerbate traffic congestion need to be discouraged. Intercity routes to outlying, isolated, existing populations, inner city backbones, or connecting intercity lines ought to be considered separately, with inner city lines as a priority.

Albert Del Rio
526-3287

LINDA LINGLE
GOVERNOR



GEORGINA K. KAWAMURA
DIRECTOR

ROBERT N. E. PIPER
DEPUTY DIRECTOR

EMPLOYEES' RETIREMENT SYSTEM
HAWAII EMPLOYER-UNION HEALTH BENEFITS TRUST FUND
OFFICE OF THE PUBLIC DEFENDER
PUBLIC UTILITIES COMMISSION

STATE OF HAWAII
DEPARTMENT OF BUDGET AND FINANCE
P.O. BOX 150
HONOLULU, HAWAII 96810-0150

ADMINISTRATIVE AND RESEARCH OFFICE
BUDGET, PROGRAM PLANNING AND
MANAGEMENT DIVISION
FINANCIAL ADMINISTRATION DIVISION

February 6, 2009

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

Dear Mr. Yoshioka:

Your request for comments on the Honolulu High-Capacity-Capacity Transit Corridor Project Draft Environmental Impact Statement/Section 4(f) Evaluation and Supplemental Information, has been reviewed. In accordance with Chapter 343, HRS, we have no substantive comment to provide at this time.

If you should have any questions regarding this matter, please contact Mr. Neal Miyahira, Administrator of the Budget, Program Planning and Management Division at (808) 586-1530.

Aloha,

GEORGINA K. KAWAMURA
Director of Finance

c: Mr. Barry Fukunaga

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DEPT. OF BUDGET, PROGRAM PLANNING AND
MANAGEMENT DIVISION
FINANCIAL ADMINISTRATION DIVISION



DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, HONOLULU
FORT SHAFTER, HAWAII 96858-5440

REPLY TO
ATTENTION OF:

February 6, 2009

Regulatory Branch
Engineering and Construction Division

Corps File No.: POH-2007-127

Mr. Ted Matley
Federal Transit Administration, 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, HI 96813

Dear Mr. Matley and Mr. Yoshioka:

This letter transmits our comments on the **Honolulu High-Capacity Transit Corridor Project (Project) Draft Environmental Impact Statement (DEIS)**, dated November 2008. The document was jointly prepared by the U.S. Department of Transportation, Federal Transit Administration (FTA) and the City and County of Honolulu, Department of Transportation Services (DTS) to evaluate the environmental consequences of the proposed 23-mile rapid transit project located between Kapolei and University of Hawaii Mānoa on the Island of Oahu, Hawaii. Our comments are provided pursuant to the U.S. Army Corps of Engineers (Corps) regulatory authorities promulgated under Section 404 of the Clean Water Act (CWA) of 1972 and Section 10 of the Rivers and Harbors Act (RHA) of 1899. Our feedback is also guided by the Project's *Draft Coordination Plan* that was developed for this project pursuant to Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFTEA-LU) and our independent statutory responsibilities under the National Environmental Policy Act (NEPA) of 1969.

As a way of background, our role as an official cooperating agency is to ensure appropriate consideration of the aquatic ecosystem throughout the environmental review process. In doing so, we expect the Final EIS to be substantively sufficient for purposes of our agency's adoption in accordance with the Council on Environmental Quality's (CEQ) NEPA implementing regulations. Furthermore, our early involvement in the Project is intended to assist FTA and DTS in complying with all applicable federal laws that fall under our regulatory jurisdiction. Towards this end, my office has submitted comments on the Project in letters dated February 13, 2006¹; April 10, 2007²; May 8, 2007³ and September 16, 2008⁴. Our most recent review of the

¹ Letter from George P. Young, U.S. Army Corps of Engineers to Kenneth Hamayasu, DTS, regarding scoping and EIS Preparation Notice

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U.S. ARMY CORPS OF ENGINEERS
TRANSPORTATION SERVICE

public DEIS encompassed all pertinent documents provided to our agency, including, but not limited to:

- DEIS, Chapters 1 through 8 (FTA and DTS, November 2008);
- Appendix A of the DEIS: Conceptual Alignment Plans and Profiles (DTS, September 2008);
- Appendix C of the DEIS: Construction Approach (DTS, November 2008);
- Water Resources Technical Report (DTS, August 2008);
- Alternatives Analysis Report (DTS, November 2006); and
- Draft Coordination Plan (FTA and DTS, March 2007)

Based on our review, we found that a number of our agency's previous comments and concerns relating to the identification/delineation of waters of the United States, project impact assessment, the 404(b)(1) alternatives analysis, and proposed compensatory mitigation were not adequately addressed or incorporated into the DEIS. In the absence of this key information, we are unable to provide meaningful comments on the subject draft NEPA document as it relates to our statutory responsibilities. Moreover, these data and assessment deficiencies could adversely affect the timeliness and streamlining of our Department of the Army (DA) permit decision. Therefore, as a cooperating agency, we suggest the following comments be vetted and resolved, as appropriate, by the Federal lead and cooperating agencies prior to the next formal step in the NEPA process.

Aquatic Resources Data Gaps

According to the President's CEQ, an EIS must rigorously explore and objectively evaluate a reasonable range of alternatives, including the proposed action. One of the cornerstones of the NEPA process is the disclosure of the environmental consequences of the proposed action and its alternatives. An analytical evaluation of project impacts is necessary in order for a reviewer to sharply compare and contrast alternatives. While there is no mandate for a particular outcome or that the lead agency achieves particular substantive environmental results, a rigorous evaluation of alternatives is required to inform decision-makers of the likely environmental consequences, both detrimental and beneficial, of the alternatives. The preface of the Project's DEIS acknowledges the purpose of the document is to "...provide...[a] full and open analysis of costs, benefits, and environmental impacts of alternatives considered...", yet based on our review of the document, we do not concur that some of these basic NEPA tenets have been adequately fulfilled.

Irrespective of the NEPA precept of a concise environmental document, at the project-specific DEIS stage we require greater specificity and disclosure of quantitative data regarding the aquatic environment. We note neither the Water Resources Technical Report (WRTR) nor Chapter 4 of the DEIS (*Environmental Analysis, Consequences and Mitigation*) contains

² Letter from George P. Young, U.S. Army Corps of Engineers to Kenneth Hamayasu, DTS, regarding NEPA scoping comments in response to FTA's NOI

³ Letter from LTC Charles H. Klinge, U.S. Army Corps of Engineers to Leslie T. Rogers, FTA, regarding cooperating agency status and SAFETEA-LU coordination plan

⁴ Letter from George P. Young, U.S. Army Corps of Engineers to Wayne Yoshioka, DTS, regarding comments on

information on: 1) the geographic boundaries of waters of the U.S., including wetlands; 2) quantitative data documenting the areal extent of direct and indirect impacts for each of the proposed build alternatives (e.g., footprint of disturbance); and 3) specific documentation of how the Project will avoid and minimize impacts to aquatic resources to the maximum extent practicable. In previous correspondence, the Corps requested the DEIS include these standard analytical and procedural requirements in order to document our geographic scope of jurisdiction and to characterize the functional losses to the aquatic ecosystem, if any, as a result of project implementation. Both aspects are fundamental to our regulatory program and DA permit decisions.

Notwithstanding the aforementioned data omissions, we offer the following specific comments on the presence/absence of aquatic resources, the analysis of impacts on the aquatic environment and proposed mitigation.

- Table 4-1 in the WRTR identifies 18 streams/waterways that occur within the study area, whereas Table 4-25 in the DEIS depicts 17 streams; the Ala Wai Canal is excluded in the latter. A third matrix, entitled “Streams in the Study Corridor” was distributed for discussion purposes during our December 2008 agency coordination meeting. This table lists 20 streams occurring in the study area that could be affected by the Project. The Corps recommends any discrepancies with the various tables be reconciled and a clear, comprehensive accounting of the existing aquatic resources within the study area be presented.
- Page 4-130 of the DEIS indicates “...wetland areas are listed in Table 4-28...” However, the aquatic resources called out in Table 4-28 do not appear to be classified or delineated based on the Corps’ 1987 Wetlands Delineation Manual (manual) and other current Corps policy. For example, nine of these water resources listed in Table 4-28 are described as concrete channels or concrete culverts, which generally are not known to support hydric soils (unless they maintain a natural channel invert), and therefore would not be considered wetlands. The Corps suggests this table be reviewed and modified, as appropriate, to categorize or otherwise identify water resources that constitute a “wetland” based on the Corps methodology.
- We noted inconsistencies with respect to the conclusions made in the DEIS regarding environmental consequences. For instance, page 4-135 of the DEIS states that mitigation is not required because no impacts to wetlands are expected, although page 4-159, Section 4.17.7 (*Natural Resources*), indicates “...[C]onstruction activities could affect wildlife, vegetation, wetlands and streams near the Project.” [Emphasis added]. The Corps recommends clarification on the conclusions of the water resources impact analysis. We also suggest a reference or citation be provided in the DEIS that directs the reader to the actual field data and detailed analysis that substantiate the findings.
- While Section 4.13.3 of the DEIS (page 4-131) asserts: “...the project would not adversely affect water resources...”, page S-1 of the WRTR states: “Piers to support the guideway may have to be located in some streams.” Similar statements on page 6-1 of the WRTR and page 4-132 of the DEIS indicate: “[A]ny piers in streams would be

placed to line up with existing bridge structures when feasible...[a]reas where elevated structures would cross navigable waterways have been identified and consultation with the Coast Guard is underway to address effects” We infer from these statements that there would be direct impacts to [potential] waters of the U.S., likely requiring review and authorization under Section 404 of the CWA and/or Section 10 of the RHA. The Corps suggests this section of the DEIS be clarified.

- Subsequent to the release of the DEIS, the Corps was informed that there may be construction methodologies that could result in direct impacts to waters of the U.S., such as the use of coffer dams (pers. comm., Amy Zaref et al., December 16, 2008). Therefore, we recommend the Final EIS identify all project features and construction methodologies that may affect waters of the U.S. FTA and DTS should provide an explicit accounting of what waterways and wetlands will be impacted, including an estimate of the footprint of disturbance (e.g., acres) and the type of impact (e.g., direct, indirect, permanent, temporary, and so forth). In order to accomplish this, a formal JD must be undertaken by a qualified consultant and verified by the Corps. Information contained in the JD, in conjunction with detailed engineering plans, should then be used to substantiate the presence/absence of jurisdictional waters of the U.S. and whether impacts would result from implementation of the proposed build alternatives.
- Section 4.13.1 of the DEIS (*Regulatory Context*) indicates the Corps regulates activities in jurisdictional waters pursuant to Section 10 of the RHA and Section 103 of the Marine Protection, Research and Sanctuaries Act of 1972, however, omits the fact we also regulate activities that involve the discharge of dredged or fill material in jurisdictional waters of the U.S. under Section 404 of the CWA. Although a separate subheading entitled “*Wetlands*” (page 4-128) correctly explains the Corps regulates wetlands under Section 404 of the CWA, it does not explicitly acknowledge that we regulate activities that discharge fill material into other types of waters of the U.S., such as non-wetland tributaries. Therefore, the text of the DEIS should be modified to clarify the scope of our jurisdiction under Section 404 of the CWA. Unless FTA and DTS intend to transport dredged or fill material for ocean disposal, the Corps does not anticipate our authorities under Section 103 of the MPRA will be relevant to this Project.
- Page 4-134 of the DEIS indicates verbatim: “...[A] letter has been sent to the Army Corps of Engineers asking for their jurisdictional determination concurring that the Project will not have a direct impact on wetlands.” We are concerned with the accuracy of this statement, as the Corps has not received a letter from the Project proponent or its designated agent requesting our jurisdictional determination (JD). Further, we have not received a draft JD report prepared in accordance with the 1987 Wetlands Delineation Manual, 33 C.F.R. § 328.3(d) and 33 C.F.R. § 328(e) to review and approve. For this reason, we request this statement be stricken from the DEIS or substantially modified to accurately portray the status of coordination with our office on the Project’s JD.

Based on recent coordination with your consultant team, we understand the aforementioned data gaps are under development and that site-specific information will be forthcoming. It is not clear, however, how this yet-to-be obtained information will be incorporated into the DEIS and

considered by the public and agency decision-makers prior to the final determination of a federally preferred alternative. Again, due to the absence of a geographic JD, we are unable to determine the extent, intensity and permanence of impacts to the aquatic ecosystem. At this time, we are also precluded from weighing in on the adequacy of a 404(b)(1) alternatives analysis, appropriate mitigation, and the possible identification of the least environmentally damaging practicable alternative (LEDPA).

Alternatives Analysis

The purpose of the Project is to: "...[p]rovide high capacity rapid transit in the highly congested east-west transportation corridor, between Kapolei in the west and University of Hawaii, Mānoa in the east, as specified in the *Oahu Regional Transportation Plan 2030*" (page 1-19). A number of alternatives were initially examined, but rejected as part of the Alternative Analysis process conducted by DTS in 2006. The Alternative Analysis Report evaluated four alternatives, including the No Build, Transportation System Management, Express Buses Operating in Managed Lanes, and Fixed Guideway Transit System. The latter was selected by the City Council as the locally preferred alternative. According to the DEIS, the NEPA scoping process confirmed that there were no other available alternatives that would satisfy the project purpose at less cost, with greater effectiveness or less environmental or community impact.

The 404(b)(1) Guidelines⁵ impose substantive requirements on the applicant with respect to the alternatives analysis and the sequenced search for the LEDPA. These guidelines are heavily weighted towards preventing environmental degradation of waters of the U.S. The regulation specifically requires that no discharge of dredged or fill material shall be permitted if there is a practicable⁶ alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences [40 C.F.R. § 230.10(a)]. Section 4.13.1 of the DEIS (*Background and Methodology*) appropriately acknowledges the applicant must conduct a 404(b)(1) alternatives analysis, however, we were unable to locate this analysis within the DEIS, its appendices or technical studies. Presuming this analysis has not yet been prepared, there is no reference in the DEIS as to when it might be performed.

Generally, if the NEPA alternatives analysis is adequately robust with respect to the aquatic ecosystem impacts such that it demonstrates that the proposed activity is the LEDPA, then it can duly serve to fulfill the 404(b)(1) alternatives analysis requirement. Otherwise, a separate alternatives analysis must be conducted to provide greater specificity and/or a modified range of alternatives in order to satisfy the substantive criteria of the Guidelines (i.e., the identification of the LEDPA). It is germane to note that if it is otherwise a practicable alternative, an area not presently owned by the applicant which could be reasonably obtained, utilized, expanded or managed in order to fulfill the basic purpose of the proposed project may be considered under the Guidelines. NEPA has similar language in which it requires that even if an alternative is not

the administrative draft EIS

⁵ U.S. Environmental Protection Agency, 404(b)(1) Guidelines, 40 C.F.R. § 230 (45 FR 85336 – 85357, dated December 24, 1980)

⁶ "Practicable" is defined in regulation as being available and capable of being done after taking into consideration cost, existing technology and logistics in light of the overall project purpose.

within the lead agency's jurisdiction it should be rigorously analyzed in the EIS if it is reasonable and achieves the project purpose [40 C.F.R. 1506.2(d)]. Despite some alternatives being outside the control or legal jurisdiction of the lead agency, their inclusion in the EIS helps to provide a sharper contrast among alternatives and informs the public as well as decision-makers of the environmental consequences (beneficial or detrimental) of alternative actions.

For the Honolulu High-Capacity Transit Corridor project, the range of alternatives includes the No Action alternative plus one build alternative with two alignment variations. The alignments considered in the DEIS are: 1) the Honolulu International Airport variation, 2) the Salt Lake Boulevard variation, and 3) implementation of both the Airport and Salt Lake Boulevard variations. Aside from the area between Aloha Stadium and Kalihi where the alignment varies, the alternatives traverse the same footprint for the majority of the 19-mile length. In fact, the DEIS states: "...the guideway would follow the same alignment for all Build Alternatives through most of the study corridor, except between Aloha Stadium and Kalihi." (pages S-4, 2-9). In consideration of the requirements of the 404(b)(1) Guidelines, the Corps recommends FTA and DTS carefully examine and clearly document the environmental differences between the build alternatives/alignments and provide documentation that there is no other practicable alternative—other than the locally preferred alternative—that would have less adverse impact on the aquatic ecosystem.

Cumulative Effects

According to the DEIS, the proposed transportation corridor is approximately 23 miles in length, of which a detailed environmental evaluation was conducted for a core 19 miles located between East Kapolei and Ala Moana Center. Future transit extensions to West Kapolei and UH Mānoa and Waikiki may occur, but are only considered in the DEIS in the context of cumulative effects. We agree this is an appropriate approach for potential future Project extensions that currently have not been approved, designed or funded. The NEPA requires that the lead agency take a hard look at alternatives and the resultant environmental consequences to enable informed agency decisions. Environmental consequences may be beneficial or adverse, but in all cases, the direct, indirect and cumulative impacts must be assessed and disclosed within the NEPA document. We found the Project's cumulative impact analysis for waters of the U.S. to lack sufficient analytical detail and robustness for purposes of public disclosure and agency decision-making. A meaningful cumulative impact assessment includes an evaluation of the historic and current conditions of the environmental resource of interest, a thorough accounting of past, present and reasonably foreseeable future projects and how such projects affect a given environmental resource when assessed in the aggregate.

The cumulative impacts to waters of the U.S. must be considered in the context of the pre-established geographic boundaries for the wetlands/waters cumulative effects analysis. The impacts that would result from the Project's build alternatives must be evaluated in comparison to the quantity and quality of aquatic resources occurring within the geographic study area and in consideration of other stressors or impacts resulting from past, present and reasonably foreseeable projects. That is, it may be that the resulting impacts from the Honolulu High-Capacity Transit Corridor project alternatives are, individually, deemed minimal when compared to the overall Project footprint of disturbance, but when the project impacts are compared to the

already diminished extent and health of wetlands existing within the study area, such impacts could be considerably more substantial. The discussion of the water resources cumulative effects offered in Section 4.18.3 (page 4-174) is inadequate to enable a fair and objective evaluation of cumulative impacts. Therefore, the Corps recommends the text be expanded to better address the suggestions outlined above.

Compensatory Mitigation

For projects evaluated under Section 404 of the CWA, no discharge of dredged or fill material into waters of the U.S. can be approved that does not meet the requirements of the 404(b)(1) Guidelines. Guidance for implementing the 404(b)(1) Guidelines is provided through the joint Corps-EPA 1990 Mitigation Memorandum of Agreement (MOA) and the new Compensatory Mitigation Rule⁷, which supersedes certain provisions of the 1990 MOA. Among other things, the MOA states that compensatory mitigation may not be used as a method to reduce environmental impacts in the evaluation of the alternatives for the purposes of requirements under 40 C.F.R. Section 230.10(a).

The Corps anticipates providing feedback on the draft 404(b)(1) alternatives analysis as the environmental process moves forward. In general, however, the following sequence of determinations will be used in evaluating the Project:

- A determination that potential impacts have been avoided to the maximum extent practicable;
- A determination that remaining unavoidable impacts will be mitigated to the extent appropriate and practicable by requiring measures to minimize impacts through project modifications and permit conditions; and
- A determination that appropriate and practicable compensatory mitigation has been provided for unavoidable adverse impacts.

The DEIS should document an explicit and transparent link between project impacts and proposed mitigation. Under the new Compensatory Mitigation Rule, greater flexibility exists for permittee-responsible mitigation through on-site and off-site mitigation. The same holds true for out-of-kind mitigation. In general, however, implementation of compensatory mitigation should occur on-site unless it is demonstrated there is no practicable opportunity for on-site mitigation or if off-site mitigation provides greater ecological benefits. Compensatory mitigation should also occur within the same watershed of impact whenever possible. If compensatory mitigation is recommended to occur outside the watershed of impact, a sound ecological rationale must be presented as to why it is the most practicable choice.

In our previous comment letters, we cautioned DTS about deferring specific mitigation planning to the permitting stage of this project. In our view, it is important that discussions with

⁷ Final Rule, Compensatory Mitigation for Losses of Aquatic Resources (Corps and EPA, April 10, 2008; 73 FR 19594 – 19705).

key regulatory and resource agencies related to compensatory mitigation begin at this phase of the NEPA process and continue throughout the permit process. Also, it is noteworthy to point out that the new Compensatory Mitigation Rule requires our Public Notice (PN) for the preferred alternative contain a statement explaining how impacts associated with the proposed action are to be avoided, minimized and compensated for and that a final mitigation plan be approved by our district engineer prior to issuance of an individual permit. Therefore, it is important that at the time of issuance of our PN the mitigation proposal is specific enough for the public to offer meaningful comments on its appropriateness and effectiveness.

Should your augmented impact analysis for aquatic resources determine there are unavoidable adverse impacts to waters of the U.S., we expect a draft compensatory mitigation plan to be prepared in accordance with Honolulu District's Mitigation and Monitoring Guidelines and the Final Compensatory Mitigation Rule. At a minimum, this plan should include the following: 1) a direct correlation between project impacts and proposed mitigation to offset the loss in functional value; 2) the specific functions and values expected to be gained through the proposed establishment, restoration, enhancement and preservation efforts; 3) a schedule for implementation; and 4) an evaluation and monitoring plan.

In addition, it may be prudent to consider implementation of certain components of the compensatory mitigation plan in advance of the impacts occurring, which may then reduce the temporal losses associated with project construction.

NEPA Procedural Requirements

As a cooperating agency with both special expertise and jurisdiction by law, we intend to adopt FTA's Final EIS for compliance with the Corps' independent NEPA responsibilities for our federal action (i.e., DA permit decision). In doing so, we will be required to issue a Notice of Intent in the Federal Register and prepare our own Record of Decision (ROD). The Corps' ROD will constitute our agency's decision document and will be relied upon for the final DA permit decision. As part of agency decision-making, the Corps will need written evidence from FTA that compliance with Section 7 of the Endangered Species Act and Section 106 of the National Historic Preservation Act has been achieved. Similarly, prior to a DA permit decision, the Corps must have evidence that the Project has obtained Section 401 of the CWA certification (or waiver thereof) and Section 307(c) of the Coastal Zone Management Act consistency (or exemption).

Public Interest Review

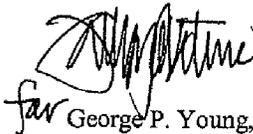
Lastly, our project evaluation process requires we balance the project purpose against the public interest. The public benefits and detriments of all factors relevant to this transportation project will be carefully reviewed and considered. Relevant factors may include, but are not limited to, conservation, economics, aesthetics, wetlands, cultural values, fish and wildlife values, water quality, and any other factors judged important to the needs and welfare of the people. The following general criteria will be considered in evaluating the Honolulu High-Capacity Transit Corridor project application:

- The relevant extent of public and private needs
- Where unresolved conflicts of resource use exist, the practicability of using reasonable alternative locations and methods to accomplish project purposes; and
- The extent and permanence of the beneficial and/or detrimental effects the proposed project may have on public and private uses to which the area is suited.

No DA permit can be granted if the project is found to be contrary to the public interest. We anticipate working with FTA, DTS, other key agencies and interested parties in the documentation of our public interest review.

We appreciate the opportunity to comment on the Project's DEIS. Our goal is to ensure the environmental review process is appropriately comprehensive, technically sound and transparent to enable meaningful public participation and informed agency decision-making. We look forward to continuing our dialogue with your respective offices as well as your consultant team. If you have any questions or concerns, please contact Ms. Susan A. Meyer of my staff at (808) 438-2137 or by electronic mail at susan.a.meyer@usace.army.mil. Please refer to the Corps File No. POH-2007-127 in any future correspondence or communications related to this project.

Sincerely,



George P. Young, P.E.
Chief, Regulatory Branch

Copies Furnished:

Mr. Alec Wong, Chief, Clean Water Branch, State Dept of Health
Mr. John Nakagawa, Office of Planning, State Coastal Zone Management Program
Mr. Michael Molina, U.S. Fish and Wildlife Service, Honolulu
Dr. Lance Smith, Protected Resources Division, NOAA Fisheries
Mr. Gerry Davis, Habitat Conservation Division, NOAA Fisheries
Dr. Wendy Wiltse, U.S. Environmental Protection Agency, Honolulu



City and County of Honolulu • State of Hawaii

February 5, 2009

Mr. Ted Matley, Community Planner
Federal Transit Administration - Region IX
201 Mission Street, Suite 1650
San Francisco, California 94105

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

DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION SERVICES

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RECEIVED

Dear Messrs. Matley and Yoshioka:

Subject: Honolulu High Capacity Transit Corridor Project
City and County of Honolulu Draft EIS 4(f) Evaluation (November 2008)

Thank you for the opportunity to provide comments on the City's high-capacity transit corridor project. We represent the Ala Moana-Sheridan, central Kaka'ako and McCully communities whose residents and small businesses are located within a 7-block radius of the Honolulu High-Capacity Transit Corridor project route between Halekauwila to Kona Street.

With respect to the central Kaka'ako and Ala Moana-Sheridan neighborhoods most directly impacted by the HHCTCP route, we have the following concerns regarding displacement of existing businesses and older residents, as well as further congestion of heavily-trafficked thoroughfares:

Transit Impacts upon Central Kaka'ako business district

In 2006, the Kaka'ako mauka portion of Kaka'ako included 1,479 businesses with 16,931 employees (representing 3.7% of Honolulu's non-agriculture workers), and generating \$2.02 billion in annual sales.

Of this amount, central Kaka'ako businesses in 2007 employed about 1,971 people and generated estimated sales of \$259 million dollars (*source: Final Report and Quarterly Report No. 4 for Contract entitled "Transit Oriented Community-based Development Project", Honolulu City Council, March 2008*).

1. Central Kaka'ako transit right-of-way acquisitions: The City's HHCTCP DEIS identifies nine private properties for acquisition in their entirety, with an

estimated 20 small businesses that generate at least \$14.4 million in annual income being directly displaced. An additional 28 properties (with roughly 30 small businesses) are proposed for partial acquisition (*source: HHCTCP DEIS, Appendix B, November 2008*), with various properties subject to loss of on-street parking, business visibility and aesthetics due to transit columns. Central Kaka'ako service businesses are especially vulnerable to transit displacement because they are subject to multiple layers of regulation – rapidly-escalating property taxes imposed by the City & County of Honolulu, combined with zoning/property assessments designed for larger landholdings imposed by the Hawaii Community Development Authority. The nature of small businesses also means that their needs and unique requirements cannot readily be addressed by a one-size-fits-all approach.

Of the remaining 54 partial acquisitions and 15 full acquisitions of house numbers (portions within a single TMK parcel) identified by the HHCTCP DEIS for the central Kaka'ako route, a large number of home owners and residents in the area will be displaced as a result of the current alignment.

2. Mitigation measures for businesses and residents displaced or impacted by transit route alignments in central Kaka'ako: Section 4-42 of the DEIS, covering impacts of the HHCTCP route upon neighborhoods, glosses over the likely impacts in the Ala Moana-Kaka'ako region through this observation:

*"[t]he transition between...[Downtown] and Ala Moana Center would require acquisitions and displacements...Because Kaka'ako has been designated a redevelopment area, changes in land uses to transit-oriented development is likely, **which may result in a change in character along the alignment, especially near stations (emphasis added).**"*

With a total of 82 partial acquisitions and 24 full acquisitions in this area alone, the HHCTCP discussion of mitigation measures and ways to address the needs of those being displaced is woefully inadequate.

We believe the following questions, which are not addressed in the HHCTCP DEIS document, must be addressed by the City & County of Honolulu for heavily-impacted neighborhoods like Ala Moana-Kaka'ako:

- What steps has the City & County of Honolulu taken in notifying property owners, residents and businesses of their likely displacement (through full and partial property acquisitions), and what assistance has been offered to property owners, residents and businesses to compensate for their losses?
- What kinds of displacement assistance and/or relocation assistance, financial aid or tax relief will property owners, residents and businesses be provided in order to address business disruption/termination? What is

Mr. Ted Matley
Mr. Wayne Yoshioka
February 5, 2009
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the City & County of Honolulu's timeline for notifying affected property owners, residents and businesses and offering assistance with relocation, financial aid or tax relief?

- What steps will the City & County of Honolulu take to help maintain service businesses in central Kaka'ako, especially where those businesses' strategic location near major employment centers (Downtown, Civic Center, Makiki, Ala Moana and Waikiki) equals over \$250 million in annual sales?

For example, central Kaka'ako houses over 25% of Honolulu's auto repair, mechanical repair/auto body and repainting businesses, as well as a substantial number of businesses providing wholesale and direct service support to Waikiki, Ala Moana hotels, restaurants and retail outlets. Where will residents, employees in urban Honolulu and Ala Moana/Waikiki businesses have to go to obtain these services?

- What actions will the City & County of Honolulu take to address displacement of property owners and residents on fixed incomes or with limited means? What programs will the City & County of Honolulu provide to assist senior citizens and elderly property owners with relocation financing, alternative housing and transit assistance as development of TODs "of a different character" emerge in their neighborhoods?

Transit Impacts upon the Ala Moana/Sheridan community

In its cursory observation of the impacts that the proposed transit route will have upon the Ala Moana/Kaka'ako area cited in Section 4-42 of the DEIS, the HHCTCP DEIS fails to incorporate recommendations from community planning and traffic studies conducted over the past decade for this area.

For example, the City & County of Honolulu's Ala Moana-Sheridan Draft Community Plan (*Department of Planning and Permitting, 2006*) and Transit Oriented Community-based Development Project, Phase I Report (*Honolulu City Council, March 2008*) have characterized this area as one with a rapidly-growing percentage of elderly residents – 65-and older residents comprise 20% of today's population, and the number is increasing.

Recognizing the high percentage of elderly residents in the Ala Moana and Kaka'ako area, the Ala Moana-Sheridan Draft Community Plan recommended a series of changes to improve pedestrian safety in the Kapiolani corridor (e.g., Kapiolani/Keeaumoku, Kapiolani/Atkinson Drive, Atkinson/Ala Moana Boulevard).

It also identified the Kapiolani/Keeaumoku intersection as one of the most dangerous intersections in Honolulu. It sought to reduce the level of through-traffic through Sheridan streets by proposing that Piikoi Street and Pensacola

Mr. Ted Matley
Mr. Wayne Yoshioka
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Street be changed from one-way streets to two-way streets that utilized a landscaped median to provide a means for pedestrians and bicyclists to safely cross these two multi-lane streets.

We believe that the following should also be addressed as part of the HHCTCP DEIS mitigation measures for the Ala Moana/Kaka'ako community:

- What steps will the City & County of Honolulu take to address the existing level of high traffic volume along the Kapiolani corridor and use transit station locations and services along its mass transit route to provide a safer transit travel alternative for elderly residents?
- What steps will the City & County of Honolulu take to reduce pedestrian safety hazards in the Kapiolani/Keeaumoku intersection, especially with respect to the elevated transit station planned for the Ala Moana Center at Nordstrom's?
- What design alternatives is the City & County of Honolulu evaluating to make it safe and easy for elderly, immigrant and very young transit-riders and pedestrians to navigate between the elevated transit station and street-level buses departing/arriving at Ala Moana Center?
- What alternatives has the City & County of Honolulu considered in identifying the best solutions for separating pedestrian traffic from vehicular traffic in the Kapiolani corridor? For example, has the City & County of Honolulu considered construction of a pedestrian overpass between the Ala Moana Center transit station at Nordstrom's and mauka side of Kapiolani Boulevard?
- What steps has the City & County of Honolulu taken to evaluate pedestrian-friendly alternatives for mauka-makai traffic in the Kapiolani corridor (e.g., Kalakaua, Atkinson, Keeaumoku, Piikoi, Pensacola, Ward), such as modifying the one-way directions for Piikoi/Pensacola Streets into two-way streets?
- What alternatives has the City & County of Honolulu considered in identifying the best means of enhancing the use of NBC Exhibition Hall and Arena and its existing parking facilities with close proximity to a mass transit station?

We strongly endorse the benefits that can accrue to our neighborhoods as a result of transit development; and seek to work proactively with our city and federal partners. Although the draft EIS has not addressed some of these issues in sufficient detail to provide appropriate mitigation, we are confident these issues can be dealt with in the months ahead as we complete our review of the Final EIS.

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Mr. Wayne Yoshioka
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We look forward to working with the City & County in addressing these concerns during this important year for transit planning and community development.

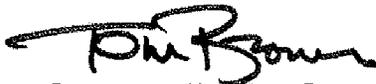
Sincerely,



Senator Carol Fukunaga
District 11
Makiki/Tantalus, Ala Moana, McCully



Senator Brickwood Galuteria
District 12
Iwilei, Chinatown,
Downtown, Kakaako, Ala Moana,
Waikiki



Representative Tom Brower
District 23
Waikiki, Ala Moana



Representative Karl Rhoads
District 28
Palama, Chinatown, Downtown,
Lower Makiki, Sheridan



Councilmember Duke Bainum
District 5
Manoa, Palolo, Makiki, McCully/Moiliili,
St. Louis, Kapahulu, Kaimuki

cc: Congressman Neil Abercrombie, District 1
Congresswoman Mazie Hirono, District 2

LINDA LINGLE
GOVERNOR

MAJOR GENERAL ROBERT G. F. LEE
DIRECTOR OF CIVIL DEFENSE

EDWARD T. YEIXEIRA
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STATE OF HAWAII
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February 10, 2008

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

Dear Mr. Yoshioka:

Draft Environmental Impact Statement
Honolulu High-Capacity Transit Corridor Project, Oahu, Hawaii

Thank you for the opportunity to comment on this important and historic development. After careful review of the documents provided for this project, we wish to propose the following recommendations:

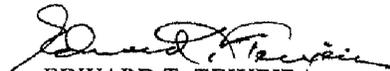
- Relating to Hazardous Materials sites, we feel that the right of way acquisition and site remediation for displaced hazardous materials operations are not fully addressed. If it has not already been done, the Department of Health should be consulted to review this area.
- Mitigation and flood plain management to control storm water quality and quantity may need to be more adequately addressed. If not already done, the Department of Land and Natural Resources should be consulted to review this area.
- When planning the location of transit stops, it is crucial for the safety of passengers that the stops and surrounding development be built outside tsunami evacuation zones. During a destructive tsunami, the structure supporting the transit system could become part of the debris field and cause extensive damage, including the loss of the system.
- In order to alert passengers of approaching tsunamis or other hazards, we recommend that both audible and visual warning displays be included in each transit station. The warning displays should be able to provide emergency information to passengers, including hearing impaired and visually impaired personnel. This warning system should aid in instructing passengers where and how to evacuate should the need arise.

Mr. Wayne Y. Yoshioka
February 10, 2009
Page 2

- Due to Homeland Security consideration and for critical infrastructure protection, we recommend that the transit stations and support columns for the transit system be built with blast barriers designed to prevent automobiles from approaching too closely. Items such as cement planters, etc, could be incorporated into the design and could provide a level of deterrence from attack.
- According to the draft EIS, freeway traffic lanes will be taken away, some temporarily for construction and some permanently. Questions that arise include where will these lane closures occur and what are their durations? Are there plans for traffic rerouting? Evacuation plans will be affected and first responders will need clear access to all neighborhoods. What plans have the City made or are planning to make in the future to mitigate the effects of any loss of lanes?
- What effect will a hurricane have on the new rail system? Are trains expected to operate? By way of comparison, the train system in Houston was shut down for ten days due to Hurricane Ike. What plans are in place to replace transportation lost for rail users once the system is deactivated due to damage?
- Two existing sirens in Waipahu and two in the Honolulu International Airport area are directly in the path of the proposed rail system. These four sirens will have to be relocated due to the construction. We will gladly work with the contractor to find suitable locations for all four sirens.

If you have any questions, please contact Mr. Richard Stercho, State Civil Defense Hazard Mitigation Planner, at (808) 733-4300, ext. 583.

Sincerely,


EDWARD T. TEIXEIRA
Vice Director of Civil Defense

c: Mr. Ted Manley, FTA Region IX
Office of Environmental Quality Control

To: Mr. Wayne Y. Yoshioka
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813
808-768-8303

From: Amy Y. Kimura
1310 Heulu St., Apt. 1002
Honolulu, HI 96822

Amy Y. Kimura

Subject: Honolulu High-Capacity Transit Corridor Project
City and Count of Honolulu, O'ahu, Hawai'i
Draft Environmental Impact Statement/Section 4(f) Evaluation



C: ✓ Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105
415-744-3133

The following are my comments on the Draft EIS due February 6, 2009. I recommend a Supplemental EIS be prepared before the Final EIS to adequately answer my and others' questions and comments,

CHAPTER 1 PURPOSE AND NEED FOR RAIL PROJECT

A. REDUCE CONGESTION INTO URBAN HONOLULU At the beginning of this process the public was told the major reason for the project was to **reduce congestion**, particularly from Leeward and Central O'ahu. As a n urban Honolulu resident I was usually not affected by this daily problem. However, on those few occasions when I found myself in it, it made me very sympathetic to their plight. I believe the City and its consultants have given short shrift to investing in an improved bus system that would reduce congestion for leeward O'ahu motorists at least as much as the rail system and much sooner and at vastly less cost to O'ahu taxpayers.

B. DIRECT FUTURE GROWTH. The other major reason discussed, one espoused by many on the City Council, was as a planning tool, to **direct future growth** toward the Second City of Kapolei. This made sense to me. I recalled Stockholm, where at rail stations there was high density: high rises with commercial spaces on the low floors, residential on the upper floors, often for the elderly. Radiating from the station were first lower density town houses and low rise apartments, then farthest away, starting perhaps from one-third or one-half mile were single-family houses. Bicycle and pedestrian paths connected with the stations without crossing a street. It was safe and well-planned, with a mixture of family types and families easily accessible to elderly parents. Each station was a little neighborhood where you didn't have to drive to take care of daily activities and needs, as is common in Japan and in New York City. But this is not what I see being planned for the first few stations being built.

C. FARFETCHED STATEMENTS BY CITY IN FAVOR OF RAIL

1. "Rail transit is a way to...provide options for those who cannot easily drive to, or park at, their destinations." [Hnl rail transit insert Advertiser and Star-Bulletin Sun-10-19-08]

Why provide an option at such a high cost for the next 20-30 years when it will do little to alleviate traffic from Leeward O'ahu (only 11% according to the City's rosy estimates) ? The City should not be

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mortgaging the taxpayers' future for something with such a small benefit and so risky. At a minimum it should exhaust other, less expensive, lessrisky, and less disruptive options like greatly improved express bus service. The City should act prudently, not be gambling with present and future taxpayers' funds.

2. "Goal: Improved Equity" "Everyone can use the fixed guideway system and **afford it.**" (Honolulu On The Move Newsletter, Feb. 2008, p. 1)

How is it possible that bus passes and fares will not increase with rail added? How can the rail be built and added costs of operating and maintaining the rail in addition to the bus system not require higher fares?

The current \$40/month adult bus pass is affordable for households with limited incomes and/or no car. The \$30/YEAR (not month) senior pass is an outstanding bargain! Nowhere in the US or Canada have I come across such a bargain for seniors. This incredible bargain offers great mobility and a high quality of life to seniors with limited income and those unable to drive. My late mother made good use of it.

3a. Improve Corridor Mobility. (1.8.1).

Decreasing congestion into Honolulu and the Central Business District can be achieved much more economically than with a multi-billion rail by the City (and State) increasing monthly employee parking rates (e.g. \$60) in the CBD to closer to private rates downtown (\$200+). This would encourage more carpooling and bus riding [but bus service must be improved to attract "Choice Riders"]. The City and State would probably have to negotiate this with the unions, but it would be much easier on the public and not disruptive to businesses along the route than constructing the rail system.

3b. "Motorists and transit users experience substantial traffic congestion and delay at most times of the day, both on weekdays and on weekends." (1.8.1)

During peak hours I agree, but **in the off-peak hours or on weekends I haven't found this in 10-15 years** of occasional driving to Waikale/Waipahu/Pearl Ridge/Pearl City from Makiki. Nor have I found this when often driving around Kalihi and Iwilei in offpeak hours. In the 90s when I used to drive to Pearl City during the morning peak period, it usually took me 10 minutes longer than in the best off-peak times. But driving back during the am peak period took an hour longer, so I learned to delay returning because I was lucky enough to have a choice most of the time.

4. "A need exists to provide a more reliable transit system." (1.8.2)

I agree, but this can be done with an improved bus system that will cost a fraction of the rail and will not be disruptive during construction nor take away parts of people's land.

5. Improve Transportation Equity (1.8.4) "Downtown median daily parking rates are the highest among U.S. cities, further limiting this [transit-dependent and lower-income workers from Pearl City, Waipahu, and Makakilo areas] population's access to Downtown."

Why would high Downtown median daily parking rates affect the transit-dependent and those without cars?

D. ALTERNATIVES INADEQUATELY EXPLORED. Mayor Hannemann and the City's consultants have **not explored alternatives adequately.** They have given short shrift to a bus and Transportation Systems Management alternatives. What I've read and heard at public meetings and hearings indicates the Managed Lane Alternative has also not been given a fair examination. When the mayor ran for office he often said the City has Needs and Wants. He would focus on the Needs before the

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Wants. I believe the rail project is a Want, not a Need. Our Needs include at least one billion dollars to bring our aging sewer system up to minimum Federal standards now that repeated waivers over the past 15-20 yearshave run out. A Federal court has ordered the City to do so. U.S. Senator Daniel Inouye is trying to use his influence to grant us an exception because he said the City cannot afford to pay for it. Yet Senator Inouye feels we can afford a much more costly five billion dollar rail system that is a Want, not a Need.

E. WHO WILL NOT BE BETTER SERVED BY THE RAIL SYSTEM?

1. **Urban Honolulu** (and Central Business District) **residents** are currently well served by the low-fare bus system, especially those without cars. They will not benefit from the proposed rail system. On the contrary, they will have poorer bus service because many bus routes from one part of Honolulu to another part will be diverted to feed the rail stations.

2. **The elderly, people of limited income, and the disabled** are best served by buses because of the low-cost fares, nearness to origins and destinations, security due to the presence of a driver on every bus, and safety because the driver waits until the elder and handicapped are on board or safely on the ground before closing the door and moving on.

3. **UHM/Chaminade/St. Louis students** because the Minimum Operating Segment will not go to UHM/Chaminade/St. Louis. Commuters from Leeward and Central O'ahu usually remark on how much less traffic there is when UH is not in session, that there really is little congestion. This contradicts the assertion that "The Project would ...meet the Purpose and Need for the Project whether or not the planned extensions are provided." [Project Phasing, p. 2-38]

4. **O'ahu taxpayers** will be spared the traffic congestion during the ten-year construction period, the much higher property taxes and GET surcharge increase necessary to build, operate, and maintain the train, and the inability to afford both rail and core city services like sewers.

5. **Tourists** will not like the visual blight created by an elevated line (this is supposed to be "paradise") and go elsewhere, affecting the state and city economy and the revenues for the 1/2% GET surcharge as well as the Tourist Accommodation Tax.

6. **Leeward O'ahu residents**, last, but most importantly, who do need relief from peak period congestion. Unfortunately, the rail will not provide that relief as I will argue in my comments. They have been misled into believing that their severe rush hour congestion affecting their quality of life will be eased when the MOS is completed in ten or so years.

CHAPTER 2 ALTERNATIVES CONSIDERED

A. NO BUILD (BUS SYSTEM), TRANSPORTATION SYSTEMS MANAGEMENT (TSM)

Express buses are tremendously more cost-effective than a multi-billion dollar fixed rail. Express buses use roadways used by cars and other buses and thus will not cause more congestion during a decade of construction as the guideway must, which can cause small and even medium-sized businesses to go under. They do not require condemnation of land for their stops.

1. **Improve express bus service from Leeward O'ahu.** It is the Leeward (and Central) O'ahu areas which are most in need of relief from rush hour congestion. I feel not enough thinking outside the

box has been done by TheBus decision makers. More express buses, especially during the morning peak period, could fill this need better and at much lower cost than a rail system. More luxurious coach-type buses should be tested to see what brand best meets commuters' needs. Most of them should be super express buses, which only pick up passengers in the originating area and only drop off in destination areas.

Example: Improve Wai'anae-Honolulu express buses. For example, Waianae super express buses should drive straight to town without stopping at Waipahu or any other place en route to the destination in, say, the CBD or Waikiki or UHM. This would minimize riding time for everyone on the bus. The bus should have upholstered seats such as tourist coaches have or long distance buses on the mainland have. I've ridden on inter-state Greyhound buses that have spacious Business Class size reclining seats like those on jet planes, with a pull-down tray-table, individual lights and air jets. The buses have a toilet on board. Riders would be able to read, use a laptop, sleep, and even eat. So even if the bus is stuck in traffic, the rider can use the time productively and in comfort.

Example: Improve Kapolei-Honolulu express buses. To minimize time spent riding and maximize space on them, express buses should stop only for pickups (no dropoffs) in Origin areas. They should allow only dropoffs (no pickups) in Destination areas. This is done elsewhere though not here. The number of Origin and Destination areas served can be determined partly by survey, partly by trial-and-error after establishing initial service. For example, whether it should include Downtown en route to UHM or Downtown and Ala Moana en route to Waikiki would depend on the number of riders to the different areas and availability of buses.

2. More than five minutes late is "Late" for express buses (1.5.3). Express buses are on average more than five minutes late 30% of the time. (p1-19) This definition of "late" is unduly strict and doesn't make sense to me. When I drive or ride the bus, I consider a 5-10 minute leeway normal, not late. Only in Switzerland or Japan with their famed punctuality would this be a reasonable definition; not in the US or elsewhere in Europe. Fifteen minutes would be "late" for the bus or when I drive.

3. TheBus serves urban residents well. Ninety-five percent of the urban population lives within one-quarter mile of a bus stop. The urban population is well served by the present bus system.

This DEIS contradicts itself when it states (p.2-9, col. 2) , "Transit service levels... would remain about the same as they are today." And then it says (p. 2-24), Some bus routes including peak period express buses would be altered or eliminated. Certain local routes would be re-routed or reclassified as feeder buses.

This is not possible if feeder buses must be diverted to transit stations to meet trains every three to six minutes and the fleet would be about the same whether the rail is built or not.

4. Apply traffic signal priority for buses now. Traffic signal priority would be given to buses during the morning peak period when the rail is built. This can be done without rail to improve the express buses' times. Trial-and-error can be used to determine the intersections with bus traffic signal priority very inexpensively compared to building and operating rail.

5. Transfers to/from rail discourage "Choice Riders." The rail stations will not be within easy walking distance of most potential riders' homes. People will find, as I did, that transfers from bus to rail and vice versa are time-consuming and a deterrent to riding the rail if you have an alternative.

Example: Yokohama. My actual ride on the subway train was about 11 minutes. But I allowed 60 minutes for my trip because there was a 5-minute walk from my apartment to the bus stop; a 5-10 minute

wait for the bus; 10-15 minute bus ride; 5-minute walk from the bus to the subway platform; 1-4 minute wait for the train; 11 minutes on the train; an 8-10 minute walk from the platform to my final destination. On the days when I had no wait times, it would take 40 minutes; on other days when I barely missed the bus and subway, it would take 55-60 minutes. I had no car and no choice but to ride public transit in Yokohama. I do not ride bicycles, so that was not an alternative.

6. Buses can stop close to home and work/school. Express buses can come close to riders' homes and destinations, making transfers unnecessary. What's most important is door-to-door time, not the time on one leg of your commute. If you can settle in for 40 minutes or so on a seat, you can read, text, work on your laptop, or sleep, activities one cannot do comfortably when transferring from one transit mode to another.

7. Elderly and disabled prefer buses. The elderly and disabled generally prefer buses because stops are closer to their homes and destinations, requiring less walking. They feel safer because they know there's a live, alert person always on the bus, its operator. They know that operator will wait for them to get on and get off before moving the bus so they're less likely to fall.

8. Tourists. They generally add little to the am peak period congestion from Leeward and Central O'ahu because most of them stay in Waikiki, and the trips they take by bus or car are usually against traffic.

9. Fallacy: TSM more polluting and energy inefficient than rail. The Alternatives Analysis concluded that TSM would have required more transportation system energy and generated more air and water pollution than the fixed guideway alternative. I believe this statement does not take into account improvements in hybrid and electric vehicles occurring now. By the time the Minimum Operating Segment of the rail is completed in ten years, electric buses powered by non-polluting electricity produced sustainably by sun, wind, ocean wave, or ocean thermal will be available. It will be much cheaper and simpler to incrementally phase in these kinds of low polluting buses than replacing the third rail providing the power for 50-60 steel-on-steel railcars. The technology to replace the third rail and cars or retrofit the cars we've purchased could be 20-50 years in the future, keeping us more oil-dependent far longer than with buses.

B. BICYCLES AS ALTERNATIVE SUPPLEMENTAL TRANSPORTATION

1. Dismissed with little real consideration in public documents/meetings During the public hearings and meetings on the fixed guideway, bicycles were dismissed. This dismissive attitude keeps bicycles from being more widely used as transportation for short and medium distances. The present setup in urban Honolulu certainly discourages all but the most determined and daring from riding a bicycle because they must compete with cars and other much larger motor vehicles whose drivers often give the defenseless rider no respect. Yet in Europe they are widely used by all ages and for trips that an American would hop in the car to do.

Example: Copenhagen. In the 1970s I was at first puzzled at the double sidewalks in the area I spent as a tourist. When I saw bicycle riders on the lower sidewalk closer to the street and pedestrians on the higher sidewalk farther away from the street, I realized what they were. I recall being amazed at sights I never saw in the US: an elderly, plump, white-haired woman dressed in nice clothing and wearing a small hat and dressy shoes, was riding a bike on a Sunday morning near the centrum, the town square, apparently on her way to or from church. Then I saw a young couple ride past, the man with two small children on his bike, the woman with what looked like picnic things on her bike, apparently heading for a picnic. Wow, I thought, when riding a bicycle is made safe enough, a lot more people will do so. I hardly expect us here to do what the Danes do, but with Hawaii's mild year-round climate, we could easily

encourage more bicycle commuting and traveling

2. Year-round climate for bicycles. With our vaunted perfect weather for bicycles and the relative short distances we can travel on a small island, bicycles are a perfect vehicle for many college students who cannot afford a car, who are young and fit, and who live short distances from campus. This would allow campus parking lots to be smaller and create less air pollution on campus. Many urban residents who live and work/attend school in town would ride a bike to work/school if it were safe to do so. This could reduce local traffic, making bottlenecks near and in town clear more quickly, helping Leeward and Central commuters.

3. Bikes on TheBus, Pearl Harbor bike path. The City must be given credit for allowing two or three bikes on the front of TheBus. There is a bike/pedestrian path from Pearl Harbor to Pearl City which is completely separated from auto traffic. There should be more like it, connecting Leeward O'ahu to urban Honolulu to give an option to those most in need of relief from congestion. This would allow the fit and would-be fit to use this mode.

4. City bicycle budget miniscule. If the City were to spend three percent of its roadway budget on bike paths/bikeways/bike facilities, it would be infusing a huge increase in funds. Improved riding for bike commuters would make us less dependent on oil, reduce the size of parking lots needed by businesses and government, and improve the bike riders' weight and health. But the City has placed a much higher priority on roadways and street parking for motorists, spending a pittance on encouraging transportation by bicycling. It is very reluctant to reduce street parking for safer bike lanes. The City has generally treated bike riding as a recreational pastime. For example, around the Waikiki Zoo there is a paved path for bikes alongside the pedestrian path that does not share the road with autos. It's where I sometimes see children and parents riding on their bikes.

5. Bicycles environmentally friendly. Bicycles represent a tremendous potential for quickly reducing importing our transportation fuel should there be an oil embargo or gasoline goes up to \$5-\$8 a gallon. Little unfamiliar or expensive infrastructure needs to be built. Land does not need to be taken from food production. There are no unsightly land-hogging windmills to be erected. No expensive underground cables need be built.

Together with an improved bus system and more shade trees to encouraging walking short distances, bicycles are part of an affordable, more sustainable, more energy independent future for O'ahu's commuters and residents.

PROBLEMS WITH RAIL

A. RAIL FUNDING PROBLEMS

1. By law, dedicated local funding cannot be used for buses or highways. State law does not allow the funds from the one-half percent GET surcharge to be used for other than a fixed guideway system (2-5). The Draft EIS does admit that, "Variables like tourism spending and retail sales could materially impact the net GET surcharge revenues available to fund the Project." (p. 6-11)

a. The **serious recession** the state, country and world are in is causing leading state legislators and the Governor to reconsider the fund's use or to suspend collecting it until the economy improves. Senate President Colleen Hanabusa and Governor Linda Lingle are both now considering using it for other state needs because of serious budget shortfalls.

if this dedicated funding source is the "only source of funding until FY2012," what will happen if the State decides next year to either suspend its collection or allow it to be used for other more immediate needs?

b. The City's **other main sources of revenue** are property taxes and its share of a state Transient Accommodation Tax (tourist tax). But property values on O'ahu have plummeted in the past year, and tourism is in a deep and worsening slump. Economists are predicting tough times for the next few years

2. **City Council's weakening position on rail.** The large majority of seven favoring a fixed guideway in the early stages dropped to a bare majority of five when UHM was left out of the MOS. One of that five no longer favors the rail after last month's vote to select the Airport route instead of a Salt Lake or Salt Lake/Airport route.

B. RAIL ROUTE PROBLEMS

1. **Failure to include UHManoa in the MOS will cause minimal reduction in congestion and large reduction in potential ridership** Without including UHM in the Minimum Operating Segment, there will be no significant impact on peak am congestion. Letters to the editor of both dailies have confirmed what my relatives, friends, and acquaintances have said: how little traffic congestion there is when UHM is not in session. Even with UHM/Chaminade I have doubts that our island population is large enough to support a rail system. All the successful rail systems that I'm familiar with serve populations of at least two million, usually more. Without UHM it will become a white elephant because farebox revenues will be far too low to cover the 27-33% users' share of operating costs required. Raising fares will cause a drop in ridership and revenues. Naturally it will cost much more to operate and maintain a rail and bus system than a bus system alone.

2. **Leeward Community College station.** Is there a station at Leeward Community College? If not, what is the reason? Because community colleges have much lower tuition than UHM, Chaminade, or HPU, many cost-conscious students elect to attend a community college for the first two years before transferring elsewhere. They should be easily accessible by public transit so people without cars can attend. During the public information sessions I did not study the station locations in the areas I was not familiar with; I assumed, perhaps incorrectly, that LCC would be served. (p 2-26)

C. RESTROOMS AT STATIONS

Where are they shown or described in the DEIS? There MUST be restrooms in every station. I saw no mention in the verbal descriptions nor could I find any in the figures I looked at. If there are restrooms in every station that should have been made much clearer in this DEIS. If not every station is to have a restroom, that should be made absolutely clear in a Supplemental EIS

Young Children need them. Any mother with a young child knows that when they say they need to go, you'd better find a restroom quickly in the station or they'll relieve themselves on the platform or against a wall in the station. When this happens on the bus, you get off at the next stop and find a bush or the gutter if no suitable place can be found in time. Odors are more quickly dissipated at a bus stop than in a train station.

Elderly. The elderly often need to relieve themselves much more frequently than younger people. Elderly men, who often have prostate conditions and cannot hold it, will do so on the platform or elsewhere in the station against a wall if there is no restroom at the station. This will create a smelly, unpleasant atmosphere for others. Maintenance costs will be much higher than if restrooms were provided to begin with.

D. RAIL REVENUE PROBLEM : FARES SEVERELY UNDERESTIMATED, REVENUES OVERESTIMATED

1. Fares severely underestimated. Rail fares have been severely underestimated. In public meetings the mayor has repeatedly said it would be the same as it is now, \$2.00 a ride. This is obviously not possible, even adjusting for inflation, when there are huge capital costs to construct the project. And of necessity operating and maintenance costs will be higher for a rail plus bus system than a bus system alone, again even adjusting for inflation. The DEIS admits that "...riders' price sensitivity could decrease ridership..."

Example: Vancouver (Canada) fares 2-4 times TheBus's. [Note: Fares are from its website in 2008. It's unclear if dollars are US or Canadian.]

Look at Vancouver, which has a steel-on-steel automated rail system plus a bus system. While the monthly adult pass on O'ahu costs \$40 and covers the whole island 24/7, in Vancouver it's \$73, \$99, and \$136 for one-, two-, or three-zones. If Honolulu used Vancouver's zone system, one zone might be urban Honolulu (from Salt Lake to Hawai'i Kai); two zones might include Ewa, Kapolei, Waipahu, Pearl City, Kailua, Kane'ohe, and Waimanalo; three zones would include the entire island. How would fares like Vancouver's impact the limited and moderate income, even the middle income working adult?

If O'ahu **adults** had to pay the equivalent of Vancouver's fares to commute to work, most of the Choice Riders would switch to their car because it would be cheaper, adding to congestion. Some of the Transit-Dependent riders of limited and even moderate incomes might become homeless due to the high cost of getting to work.

For **children** it's \$20 for the monthly pass. In Vancouver it's twice as much, \$42/month, the same as for seniors there. If children's fares are not reasonably priced, parents may then begin driving them, adding to congestion and defeating a major purpose of rail transit.

For **seniors**, it's a superbargain \$30/YEAR, or \$2.50/month pro-rated. Seniors may use this pass 24/7. In Vancouver, it's \$42/MONTH, more than it costs for one year on O'ahu.

Individual senior fares are \$1.00 with a Medicare card; in Vancouver a 10-ride card costs \$16.00, or \$1.60/ride.

2. Seniors' quality of life lowered with higher bus fare/pass. Their superbargain fares will be gone. The necessary higher fares due to additional costs of building the rail, operating and maintaining it in addition to the bus system will impact especially limited income households and the transit-dependent with no household car. Most of these are in urban Honolulu and are better served by the bus system. Seniors all over who use the bus will be impacted by a necessarily higher fare. Many will choose to not purchase a much more expensive pass, thereby decreasing their mobility and quality of life. Few seniors are aware how much higher their fares would be with rail.

3. "Choice Riders" will choose auto. When the rail is completed in ten years the necessary **high cost rail transit passes/fares will deter transit-optional riders, whose loss will lower expected farebox revenues and whose shifting to auto will add to congestion during peak period traffic.**

Choice Riders, those who ride the bus but have access to a car, are 29-35% of bus riders according to the Bus Survey. High fares, loss of direct bus routes between home and work in urban Honolulu, and

inconvenient transfers due to diverting buses in urban Honolulu to feeder lines to the rail stations will result in loss of some of these transit riders, reducing revenue.

4. Inadequate parking at stations will reduce ridership. The lots to be built at East Kapolei and several of the suburban stations allow for only one-third of the estimated morning peak period commuters to park. An optimistic estimate would be one-third will walk, ride a feeder bus, ride a bicycle, or be dropped off. What will the other one-third do? They will drive to work/school, adding to road congestion and decreasing operating revenues.

5. Unrealistic headway frequencies produce overly high rider capacity estimates. When I was a commuter in Yokohama, with a population at least three to four times Honolulu's, the rush hour headway was more like four minutes. Thus, the peak hour load trains here would carry is overestimated because there will be 12-13 trains per hour instead of 17-18 per hour in one direction. In New York City outside of Manhattan, headways during rush hours were at least five minutes.

(The six-minute and ten-minute headways at off-peak and night times are also unrealistic. In Yokohama they ran about six to ten minutes off-peak on weekdays and about 12-15 minutes on weekends. In New York City where I was a commuter many years ago and still use the subway on more recent visits, the night and weekend trains often run every 20 minutes, depending on which train you're taking. Running them less frequently should reduce operating costs a little and is not likely to have much effect on the weekend and late night ridership)

E. RAIL OPERATION PROBLEMS: SAFETY, SECURITY

1. Station parking lots at night are unsafe for women, elderly. Walking to one's car at night after working late could be unsafe for women and the elderly because they would be good places for would-be robbers/rapists to lie in wait for vulnerable victims.

2. Automatic driverless trains should not be considered.

- a. Without an operator/driver like Vancouver, women and elderly will be easy prey at night
- b. They encourage **crime**. At night empty cars will attract graffiti, vandalism, and worse crimes. This will lower ridership.
- c. They can be **hazardous** for the disabled and elderly. Many years ago I witnessed an elderly friend's leg get caught in the subway door as she exited. She could not extricate it. Fortunately, the employee in the cab whose job it was to make sure everything was clear saw her predicament and quickly opened the door, allowing her to pull out her leg. Had he not done so, she would have been dragged along the platform floor as the train left the station.
- d. They invite the **homeless**. They would be a dry, comfortable place to sit/lie down at night and cool and airconditioned during hot days for the homeless. If homeless people begin spending much time in the stations and on trains, urine odors could become a problem, particularly if there are no restrooms in the stations. This will discourage Choice Riders who will drive, adding to congestion.

QUESTIONS/SUGGESTIONS

I found some sections of the DEIS puzzling and would appreciate an explanation or rationale for that

particular statement, table, or figure. I am not an engineer, architect, or transit technician. I am simply a citizen who rides public transit as well as drives a car. I have some experience with public transit as a user, having been a commuter on the New York subway and Yokohama transit systems. As a traveler, I've used public transit more than the typical American tourist. I've found buses and subways are an interesting way to see the locals; they're reasonably priced and the light/heavy rail is usually fast and efficient. I have ridden on commuter and urban rail systems, light rail (usually trolleys), buses, and ferries.

1. In what situations does the Transportation Research Board define "late" as more than five minutes late for an express bus? If it does, I find it contrary to most people's thinking.
- 2 a. Peak-Period Transit Work Trips (1.3.2). Why is Waipahu-Waikele lumped together with urban Honolulu for home-based origins of work trips? It should be separated to show the need for the train being built to serve their commute to urban Honolulu. (p 1-13)
- 2.b. Similarly, why are Waipahu-Waikele bus commuters lumped with others--all in urban Honolulu, where congestion is not a major problem--to account for 50% of islandwide am peak-period home-based work trips? Waipahu-Waikele needs to be separated to help support the need for the train.
3. The 60% of all am peak period bus trips destined for work in Downtown, Punchbowl, Sheridan-Date, and Waikiki do not show if the origins are primarily in urban Honolulu or Leeward or Central O'ahu. They should be broken down by Origin areas so that the percent of trips originating in Waipahu, Waikele, Kapolei AND ending in Downtown, UHM/Makiki, Ala Moana, Waikiki, and other parts of urban Honolulu can be clearly seen. Similarly, the raw numbers and percent of trips originating from the Waianae Coast in the am peak period should be connected to their destinations in urban Honolulu and shown in a table. (p 1-13)
4. Figure 2-38 Kapolei Bus Service. Bus route numbers and routes should be more clearly delineated. In my travels I've used bus maps that do this.
5. Figure 2-39 Central Oahu Bus Service. The map should have bus route numbers and routes clearly delineated. What are the Bus route numbers? (p2-35)
6. Bus System (p 2-36). What are these "special shuttles" and whom will they serve? (p2-38 col 2)
7. The Bus Level-of-Service should be displayed like the green boxes on p 3-3.
- 8.a. Fig. 1-11. Why were Routes 52 (Wahiawa-Circle Island) and 55 (Kane'ohe-Circle Island) selected? They're both going against traffic, one to the North Shore, the other to the Windward side. They're also primarily sightseeing buses aimed at tourists going to Turtle Bay Hotel and to the Windward coast.
8. b. According to Figure 1-11, Bus 52 took about 130 minutes in 2007 to go from some place to someplace else. The 12/7/08 timetable says it's 93 minutes from Ala Moana Center to Haleiwa Beach Park in the morning rush hour. What are the starting and ending points for the 130 minutes? How was this time obtained?
- 8.c. Moreover, Figure 1-11 also shows Route 40 (Honolulu-Makaha) takes about 170 minutes in 2008, about 150 minutes from 2004-2007. But the 12/7/08 Route 40 timetable shows the 6:11 am originating from Makaha Towers arrives at Ala Moana Center at 8:37 am, 146 minutes later. The 6:41 am from Makaha Beach arrives at Ala Moana Center at 9:01 am, 140 minutes later. How do you account for this discrepancy?
8. d. Of course, all of these times are unacceptable. TheBus should look immediately into providing a

Super Express from the Wai'anae Coast that skips all stops from Kapolei until Middle Street to reduce the time any rider from that area has to spend on the bus. The Bus should also immediately begin exploring more comfortable coach-type buses for those who must spend over one hour on the bus. Other express buses originating from Kapolei should be provided.

9. Pedestrian and Bicycle Systems (1.4.4). "...there are 98 miles of existing bicycle facilities on O'ahu."

What is included in "facilities"?

10. TRAIN SPEED. I do not understand why a speed of 55 mph is necessary when stations are going to be a mile apart. Isn't it more horsepower (?) than necessary for an urban train stopping so often? The NYC subway averaged about 30 mph yet was faster, cheaper, and more convenient than driving. Many upper middle income people commuted on the subway because parking was so costly if even available, and driving was slow and nerve wracking. Only the express trains were able to go much above 30 mph on a limited stretch, and express lines require a third track, which has never been proposed for O'ahu. The Yokohama subway averaged about that or less but was the most convenient and cost-effective way for most middle-income commuters to get to work or school because of high parking costs.

Isn't requiring a train capable of 55 mph akin to having a car capable of 100 mph when the highest legal speed on a freeway is 60 mph?

11. AIRPORT AREA EMPLOYMENT STATISTICS. What are the employment statistics for the Airport area, including and excluding airport employees, most of whom do not need to travel during peak hours? (Fig. 1-6 lumps Airport with Pearl Harbor for an impressive 38.5k. But at a public meeting a City employee/consultant said there were about 900 airport employees.)

12. FARE INSPECTORS ON TRAINS. Are turnstiles not being included in every station? Usually there are turnstiles where one inserts a card or token, obviating the need for an inspector to randomly check for payment. They could be useful at night to discourage freeloaders who sneak in, but wouldn't it be more cost effective to have them in the stations to catch people sneaking in without paying? Also if there are turnstiles, would the freeloaders caught or deterred offset the cost of having an employee to catch them?

What is the rationale, where has this been tried successfully, and for how long has it been done?

I recall it being done on light rail/trolleys in Germany, but these were **surface trolleys** where passengers could board from center or rear doors directly from the sidewalk trolley stop like one boards a bus. It was also done on long distance trains where stops were perhaps five miles apart, giving the conductor time to check an entire car between stops.

In my travels I cannot recall fare inspectors on city subway/trains randomly checking for valid tickets, passes, or transfers in New York City, Washington DC, Boston, Philadelphia, Portland, Los Angeles, San Diego, Vancouver, or Toronto in North America; nor in England, Paris, Italy, Austria, Hungary, Czech Republic, Poland, Denmark, or Sweden in Europe; nor in Japan.

13. Table 7-9. Comparison of Transit Travel Times (Minutes) among Alternatives.

Are the times Door to Door?

14. The 12/2005-1/2006 Bus Survey was a good idea. A survey done of households from Leeward and perhaps Central O'ahu could have yielded valuable data for planning transit. It certainly wouldn't be inexpensive; I can imagine it costing \$40-80,000, but that's a small investment compared to the \$10

million spent on consultants early on.

15. Additional bus service with school buses or private vehicles was rejected [Table 2.2]. Why was this not explored? Possible contracts with tourist buses for peak period express use would be much cheaper than rail. It might also help them survive during poor economic periods. It would have allowed testing the different kinds of coaches without purchasing them by the City. Purchase of other more luxurious coaches to attract motorists from their cars thereby reducing congestion during rush hours seems to have not been explored.

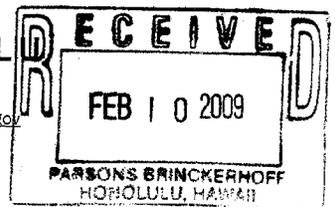
16. BUS ADVISORY COMMITTEE. Is there a Bus Advisory Committee comprised of regular bus riders from all over the island to advise TheBus on problems and make suggestions on improvements? Ideas and comments from the public could be presented at its monthly or bimonthly public meetings announced and held at a time convenient for commuters and in a location convenient to bus riders. If there is one, I would like information on where and when it meets. If there isn't one, I recommend it be established soon.

I appreciate your consideration of my comments.

Aloha,
Amy Y. Kimura

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

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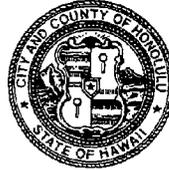


DAVID K. TANOUE
ACTING DIRECTOR

ROBERT M. SUMITOMO
DEPUTY DIRECTOR

2008/ELOG-2787(mh)

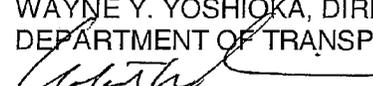
MUFI HANNEMANN
MAYOR



February 6, 2009

MEMORANDUM

TO: WAYNE Y. YOSHIOKA, DIRECTOR
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: *for*  DAVID K. TANOUE, ACTING DIRECTOR
DEPARTMENT OF PLANNING AND PERMITTING

SUBJECT: HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT DRAFT
ENVIRONMENTAL IMPACT STATEMENT (DEIS)/SECTION 4(f)
EVALUATION

In response to your request for comments on the Honolulu High-Capacity Transit Corridor Project DEIS, the Department of Planning and Permitting (DPP) has the following comments:

1. The Final Environmental Impact Statement (FEIS) should discuss any mitigation measures to be taken for loss in property values along the corridor where there are adverse impacts.
2. The FEIS should include a listing of all properties that are to be acquired in full or in part, their addresses and TMKs, and the estimated value at the time of acquisition.
3. *p. 1-7, Figure 1-4 Major Activity Centers in the Study Corridor:* Kalaeloa Industrial Park should be identified as "proposed".
4. *p. 2-25, Figure 2-14 East Kapolei Station (All Build Alternatives):* The map extent of this figure should be expanded to the southeast to show the pedestrian access and connectivity between the East Kapolei Station and the planned Kroc Community Center.
5. *p. 3-34, Table 3-18 Mode of Access to Fixed Guideway Stations – 2030 Build Alternatives:* This table should include bicycling as a mode of access. Bicycling is a key component of an integrated inter-modal transportation network and should be added as mode of access to Table 3-18 in the FEIS.

6. *p. 3-35, Access to Fixed Guideway Stations:* This section states that each station would have facilities for parking bikes, and each guideway vehicle would be designed to accommodate bicycles during off-peak hours. Bicycling as a mode of transportation should be strongly encouraged, and thus guideway vehicles should also be able to accommodate bicycles during peak hours. This should be clarified in the FEIS.

This section also states that sidewalks and crosswalks are currently available at stations or would become available as streets and sidewalks are built in developing areas. Emphasis should also be on creating an inter-modal transportation network in the neighborhoods surrounding the stations. The FEIS should address the need for identifying and developing safe and convenient pedestrian ways and bikeways to connect the existing residential areas with the transit stations. Sidewalks and bike paths leading to and from the transit station should be planned, designed, and constructed before the transit station opens.

7. *p. 3-41, Spillover Parking Effects on Station Areas:* This section states that the West Loch, Pearlridge, Iwilei, and Ala Moana Center stations were projected to have the largest demand for spillover parking and were selected for further study. A detailed table should be provided in the FEIS that shows for the Build Alternatives the spillover demand in the morning and evening peak periods for each of the four stations. Public input from community meetings held for the Waipahu Neighborhood TOD Plan indicated that residents felt strongly about the need for a park-and-ride facility at the West Loch station, and that without such a facility there would be spillover parking, particularly from residents living mauka of the freeway.
8. *p. 3-41, last bullet:* Although we agree with this bullet, it should be removed from this section or clarified. Spillover parking near stations would largely be from residents living in the surrounding neighborhoods and communities that are driving to the station. Residents living in future development in the station areas would have the greatest likelihood of walking to the transit station, and thus would not be a significant contributor to spillover parking.
9. *p. 3-43, Effects on the Bicycle and Pedestrian Network:* The FEIS should discuss ongoing work on the Oahu Bike Plan and discuss key recommendations of the Plan, if available, as they pertain to developing bike paths that link surrounding neighborhoods with the transit stations.

The FEIS should also disclose if pedestrians who are not taking transit would be allowed to use the mezzanine level of stations to cross streets. Creating a safe and convenient way for pedestrians to cross heavily traveled roadways is critical, particularly with the anticipated increase in pedestrian activity from transit patrons and TOD in the station areas, and a growing elderly population.

10. *p. 3-44, Parking:* This section states that parking surveys of on-street unrestricted parking supply would occur approximately six (6) months before implementation of the fixed guideway service. The FEIS should provide a schedule relating to when potential strategies will be decided and implemented vis a vis operation of the transit system.
11. *p. 4-12, Figure 4-2 Planning Regions and Planned Land Use:* This figure should include the routes of planned extensions to the west and east as shown on Figures 2-5 and 2-8, respectively.
12. *p. 4-13, Future Land Use Plans and Policies:* This section states that TOD Special Districts would encourage mixed-use, high-density, walkable communities around transit stations. The objective of TOD is not necessarily to promote high-density development, but rather development that is concentrated around the transit stations and at densities that are contextually appropriate for a given community.

The FEIS should also mention the Waipahu Town Plan (1995), Pearl Harbor Historic Trail Master Plan (2001), and Kalihi-Palama Action Plan (2004) as promoting transit-supportive development patterns, pedestrian-friendly environments, and an inter-modal transportation network.

13. *p. 4-20, Common to All Build Alternatives:* In addition to how the proposed project is consistent with the `Ewa Development Plan, the Final EIS should also discuss how the proposed project is consistent with section 4.1.3.2 Planned Transit Corridor, pages 4-8 and 4-9, of the Central O`ahu *Sustainable Communities Plan*. The Final EIS should further discuss how the proposed project is consistent with the rapid transit corridor as shown on the Public Facilities Map in Appendix A of both the `Ewa Development Plan and Central O`ahu *Sustainable Communities Plan*. Furthermore, the Final EIS should include a discussion of how the proposed project is consistent with the Public Infrastructure Maps for Ewa, Central O`ahu, and the Primary Urban Center.
14. *p. 4-43, Common to All Build Alternatives:* This section states that since the transit system will be elevated, it would not create a physical barrier to pedestrian

or other forms of travel within the study corridor. However, with anticipated increase in pedestrian activity from transit patrons and TOD in the station areas, mitigative measures to assure pedestrian safety should be identified in the FEIS. Pedestrians, especially the elderly, disabled, and young children, need safe access and adequate time to cross heavily traveled roadways.

15. *p. 4-57, Section 4.7.1 Background and Methodology:* There is mention that the Diamond Head and Punchbowl Special Districts may be affected but they are not discussed any further. It is not certain how these two (2) districts are impacted by the proposal. The Final EIS should discuss how the proposal meets the objectives and design guidelines for each of the Special Districts – Chinatown, Hawaii Capital, and Waikiki.
16. There should be more discussion about alternative track profiles and configurations that would help to mitigate the negative visual impacts. This should include the various components of the tracks, i.e., tracks (height, widths, and profiles), columns (diameters, configurations, and heights), materials and finishes (concrete and steel), and landscaping (screening).
17. *p. 4-61, Kalihi to Ala Moana Center Landscape Unit:* Missing from this bulleted list of panoramic views is the view from the Kakaako Waterfront Park toward Punchbowl and the Koolau Range (PUC DP, June 2004). Furthermore, the panoramic and mauka-makai view corridors identified in the PUC DP should be graphically shown on a map in the FEIS.
18. *p. 4-63, Table 4-10:* Item 13, which describes the visual impact of the Chinatown station and guideway, conflicts with the description of environmental consequences to neighborhoods (Downtown) discussed on page 4-44. The latter states that the Project would not create a new barrier or affect the physical character of adjacent communities. This should be clarified in the FEIS and mitigative measures identified.

The FEIS should include visual simulations of each station in the Build Alternatives that show the mass of the station buildings in relationship to surrounding land uses/structures. The FEIS should include elevation views of each station that show the station from all sides in relation to surrounding uses. For example, views of the Salt Lake station should also be from the south side looking towards the three-story apartments. The FEIS should also include visual simulations of the Build Alternative that illustrates the visual impact to panoramic views and mauka-makai view corridors identified in the PUC DP.

19. *p. 4-75, Figure 4-27 Viewpoint 11 – Dillingham Boulevard at Kalihi, looking Mauka:* Regarding the simulation with the fixed guideway, what is the distance from the top of the future transit vehicle to the existing overhead utility lines. There may be a need to raise or relocate the existing lines. Please consult with Hawaiian Electric Company, Inc. regarding this matter for similar situations along the corridor since there is generally a safe electrical distance requirement.
20. *p. 4-84, Figure 4-36 Viewpoint 20 – Mother Waldron Park near Halekauwila Street/Cooke Street Intersection, looking `Ewa:* Why is the straddle bent guideway with double columns only utilized along Halekauwila Street in Kakaako? Couldn't the on-street parking be eliminated on one (1) side so that the guideway columns could be placed down the centerline of the roadway? This straddle bent guideway is rather bulky especially for the abutting senior housing units (major visual impact).
21. *p. 4-85, Common to All Build Alternatives:* This section states that RTD will coordinate with the City to identify the particular needs of each view. The FEIS should expand upon this and identify which City Department(s) would be consulted and what the methodology would be to achieving this so that appropriate mitigative measures are identified.
22. *p. 4-86, Fort Weaver Road to Aloha Stadium Landscape Unit:* This section states that the West Loch station and respective transit center would blend well with the bulk and scale of the Waipahu Town Center's densely developed commercial character. This statement should be revised as the Waipahu Town Center is far from being densely developed, particularly with the large surface parking lot adjacent to Farrington Highway.
23. *p. 4-93, Mitigation:* Information on the particular needs of each view (as stated on page 4-85) needs to be added. The relocation of trees within the station area should also be added as a mitigative measure.
24. There should be more discussion about the visual impacts of the guideway between Kamakee Street and Ala Moana Center.
25. In Section 4.7, the mitigation measures should be expanded with more discussions on how to minimize the negative visual effects.
26. *p. 4-138, Mitigation:* A bullet should be added that states that the first priority for street trees transplanting should be within the station area or neighborhood from where they were originally planted. For example, the trees along Farrington

Highway in Waipahu, a source of community pride, should be transplanted within the West Loch or Waipahu Transit Center station areas or elsewhere within Waipahu. This should also be added to Table 4-1 under the section pertaining to visual and aesthetic conditions.

27. *p. 4-161*: Delete duplicate page.
28. *p. 4-166, Station Area Development*: This section states that the TOD Ordinance is expected to be enacted in 2008. The FEIS should update this information and state that the TOD Ordinance should be adopted in 2009.
29. *p. 4-166 and p. 4-167, `Ewa Plain: East Kapolei, UH West O`ahu, and Ho`opili*: All references to the Hunt Development Group should be deleted since this organization is no longer working with the UH West O`ahu to develop the Private Development Lands.
30. *p. 4-176, Table 4-37 List of Anticipated Permits*: This section listing anticipated City permits and/or approvals is incomplete. Permits from DPP may include, but are not limited to building, grading, grubbing and stockpiling, trenching, dewatering, drain connection and subdivision. See attached table which is not a final list. The table also includes other permits and approvals that may be required from State and Federal agencies.
31. The project may be required to comply with Section II (Storm Water Quality) of DPP's "Rules Relating to Storm Drainage Standards".
32. Outside of specific areas, e.g., land under federal jurisdiction or the Kakaako District as designated in the Hawaii Revised Statutes, the Honolulu City Council is the authority for the granting of major permits within the special management area (SMA) as established by Chapter 25, Revised Ordinances of Honolulu (ROH). However, there is insufficient information in the EIS to determine which project sites and/or activities meeting the definition of development in ROH Section 25-1.3 would require a major (or minor) SMA use permit. Therefore, for portions of the project that are in or near the SMA boundary, the Final EIS should include an overlay of these project areas with SMA boundaries to determine if permits will be required. Please consult with the Land Use Permits Division of the Department of Planning and Permitting at 768-8013.
33. Park and ride, maintenance and power generation facilities located within the 100-year flood plain are subject to compliance with flood hazard requirements. In addition, the planning, design and construction of these facilities and the entire

Wayne Y. Yoshioka, Director
Department of Transportation Services
February 6, 2009
Page 7

transit system should also take into account the possibility/implications of at least a one (1) meter rise in sea level over the next 50-100 years due to climate change and global warming. Please consult with Dr. Chip Fletcher of the University of Hawai'i at 956-2582.

34. *p. 6-2:* Are park-and-ride facilities included in capital and O&M costs?
35. *p. 6-5, Figure 6-1:* The FEIS should provide an explanation for the bump in the graph at year 2027.
36. *p. 6-8, Figure 6-3:* The FEIS should explain the steep rise in transit subsidies at year 2018.

We look forward to receiving the Final EIS. Should you have any questions, please contact Matt Higashida of our staff at 768-8045.

DKT:js

Attachment

cc: Katherine Puana Kealoha, Esq., Director, Office of Environmental Quality Control
Ted Matley, Federal Transit Administration, Region IX
~~James T. Hayes, Parsons Brinckerhoff~~

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RAIL TRANSIT PROJECT
 REQUIRED PERMITS FROM DPP
 (working draft)

Permit	Division*/Branch	Contact Name/ phone # (768-)	Comments
Subdivision/Easements	SDD/Subdivision	Mario Siu-Li/8098	
Construction Plan Review Street Lights Traffic Signal	SDD/Subdivision	Mario Siu-Li/8098	Only for work in city r-o-w. One Time Review.
Flood Hazard Variance	SDD/Subdivision	Mario Siu-Li/8098	
Sewer Connection	SDD/Wastewater	Dennis Nishimura/8197	
Grading, Trenching, Grubbing and Stockpiling	SDD/Civil Engineering	Mel Takakura/8104	
Storm drain connection	SDD/CEB	Mel Takakura/8104	
Construction dewatering	SDD/CEB	Mel Takakura/8104	
Industrial Discharge Permit	SDD/Wastewater	Dennis Nishimura/8197	For any sump pits in elevators, or any non- domestic discharge
Building Permit Combustible & Flammable Liquid Tank Certificate of Occupancy	Building Division	Tim Hiu/8120	Only required for work outside of r-o-w. Use Third Party Review?
Relocation Permit	CSO	Art Challacombe/8117	If Applicable
LUO Waiver for public uses Structures in Yard Height Limit Signs Parking Floor Area	LUPD	Bob Bannister/8012	As applicable
Contractor temporary staging area/yard	LUPD	Bob Bannister/8012	DTS can self-regulate
Special Management Area	LUPD	Bob Bannister/8012	If applicable. Requires City Council approval
Special District (Hawaii Capitol, Chinatown)	LUPD	Bob Bannister/8012	
Public Infrastructure Map (PIM)	Planning/PPB	Randy Hara/8041	Already done
Unilateral Agreement (UA) Compliance	Planning/DPZC	Eugene Takahashi/8035	As applicable, checked as part of subdiv/BP review
Urban Design Plan Compliance	Planning/CPB	Bonnie Arakawa/8048	As applicable under UA, checked as part of subdiv/BP review

* LUPD Land Use Permits Division
 SDD Site Development Division
 BLDG Building Division
 CSO Customer Service Office

CEB Civil Engineering Branch
 PPB Policy Planning Branch
 DPZD Development Plans & Zone Change Branch

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OTHER PERMITS MISSING FROM FIRST DRAFT

Permit	Respn. Dept.	Comments
Right of Access	DLNR	For DLNR land in Kapolei
Stream Channel Alteration	DLNR	Any work in streams
??	Dept of Army	Any work in streams
401 Certification	DOH	Any work in streams
Street Usage	DTS	Any work within city road right-of-way, vehicular and pedestrian traffic
?		Alignment, stations in Kalaeloa and Kakaako

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

February 12, 2009

Mr. Ted Matley
U.S. Department of Transportation
Federal Transit Administration
201 Mission Street, Suite 1650
San Francisco, California 94105

Subject: Draft Environmental Impact Statement for the Proposed Honolulu High-Capacity Transit Corridor Project, Oahu, Hawaii (CEQ #20080469)

Dear Mr. Matley:

The Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. Our detailed comments are enclosed.

While EPA supports the goal of providing transportation choices to the communities of Oahu, we have some concerns related to wetlands, water quality, environmental justice, and noise impacts. EPA has rated this document EC-2, *Environmental Concerns, Insufficient Information*. Please see the attached *Rating Factors* for a description of our rating system.

We are particularly concerned that the Draft Environmental Impact Statement (DEIS) does not contain any quantitative information about the location, acreage, and potential impacts to aquatic resources, hydrology, and waters of the United States in the project area. Impacts to waters of the United States will be subject to Clean Water Act (CWA) Section 404 (b)(1) Guidelines (40 CFR 230). If it is determined that an Individual Permit is required, only the Least Environmentally Damaging Practicable Alternative (LEDPA) can be permitted pursuant to the 404 (b)(1) Guidelines. In addition, without any data regarding potential impacts to hydrologic flows and potential downstream impacts, it is difficult to determine whether significant impacts may occur and what mitigation commitments are needed. EPA recommends that a meeting be scheduled with our wetlands staff and staff of the U.S. Army Corps of Engineers Regulatory Branch to discuss CWA requirements and potential project impacts to hydrology in the area.

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We are also concerned that required consultation processes, such as 1) Section 106 consultation for potential impacts to historic and archaeological resources, 2) the water quality assessment associated with the sole source aquifer, and 3) the determination of consistency with the Hawaii Coastal Zone Management Program, have not been completed. These processes should be completed prior to publication of the Final Environmental Impact Statement (FEIS) in order to determine whether or not significant impacts will result. The FEIS should document the specific consultation processes, any additional impacts identified through this coordination, and all resulting mitigation commitments.

Finally, while we believe that most of the alternatives eliminated prior to the DEIS are documented sufficiently, we have remaining questions about why light rail or bus rapid transit in an exclusive right-of-way were not considered as reasonable alternatives in the DEIS. Additional information should be included in the FEIS explaining why these technologies were not considered to be reasonable alternatives and were therefore not reviewed in the DEIS.

We appreciate the opportunity to review this DEIS and look forward to future coordination on the project. When the FEIS is released for public review, please send two copies to the address above (mail code: CED-2). If you have any questions, please contact Connell Dunning, Transportation Team Leader, at 415-947-4161, or Carolyn Mulvihill, the lead reviewer for this project, at 415-947-3554 or mulvihill.carolyn@epa.gov.

Sincerely,



For

Kathleen M. Goforth, Manager
Environmental Review Office (CED-2)

Enclosures:
Summary of EPA Rating Definitions
EPA's Detailed Comments

cc: Wayne Y. Yoshioka, Department of Transportation Services, City and County of Honolulu
Susan Meyer, U.S. Army Corps of Engineers

Alternatives Analysis

EPA recognizes that a significant amount of analysis of alternatives has taken place and has been documented prior to the Draft Environmental Impact Statement (DEIS). While we believe that most of the alternatives eliminated prior to the DEIS are documented sufficiently, we have remaining questions about why light rail or bus rapid transit in an exclusive right-of-way were not considered as reasonable alternatives in the DEIS. The Final Environmental Impact Statement (FEIS) should identify the specific rationale behind the elimination of these technologies from consideration.

Recommendation:

- Include additional information in the FEIS explaining why light rail or bus rapid transit in an exclusive right-of-way were not considered to be reasonable alternatives and were therefore not reviewed in the DEIS. If these technologies may have resulted in fewer environmental impacts, further justification is warranted to substantiate why those less damaging alternatives were not carried through for consideration.

It is also our understanding that modifications to the alignment described in the DEIS are being considered in order to avoid federal facilities in the current project area. These changes and the impacts associated with them should be described in the FEIS, along with the reasons for considered modifications. If significant variations from the analyzed alternatives are proposed, the Federal Transit Administration (FTA) and the Department of Transportation Services (DTS) should consider preparing a Supplemental DEIS for public review. EPA is available to discuss with FTA and DTS the appropriate level of environmental documentation needed should new information be incorporated into the document.

Recommendation:

- Include information in the FEIS about any changes to the proposed alignment and impacts associated with those changes. Consult EPA regarding the appropriate level of documentation.

We understand that the project will eventually include extensions of the proposed project on both ends of the initial segment. However, the extensions to the project were not analyzed in this DEIS. It is critical that selection of the alternative for the initial segment not preclude a reasonable range of alternatives for those future extensions. Given that the proposed project is an elevated structure, there are few remaining alternative sites where the subsequent extension projects can "link" to the project. The extensions should be viewed as reasonably foreseeable future actions and, as such, should be analyzed thoroughly in the cumulative impact analysis. Specifically, what additional

resources of concern will be affected should the proposed action be carried forward and should the proposed extensions be built?

Recommendation:

- Ensure that selection of the alternative for the initial segment will not preclude a reasonable range of alternatives for future extensions. Include an analysis of potential impacts, and mitigation for those impacts, that would occur should the extensions to the project be built. Identify all reasonably foreseeable future actions associated with the placement of the proposed project as well as the impacts to resources from those future actions. Provide any mitigation for these identified cumulative effects.

Wetlands and Waters

In our January 6, 2006 and April 13, 2007 scoping comments, EPA stated that the DEIS should disclose the approximate area of waters of the United States that occur within the study area of the proposed project, including permanent and intermittent streams and wetlands. The Clean Water Act (CWA) Section 404(b)(1) Guidelines at 40 CFR Part 230.10(a) state that "... no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences." While the DEIS states that "no direct impacts to wetlands are expected" (page 4-134), EPA believes that it is likely that the project will have both direct and indirect impacts to waters of the United States. FTA and DTS will have to demonstrate that potential impacts to waters of the United States have been avoided and minimized to the maximum extent practicable prior to obtaining a CWA Section 404 permit (40 CFR 230.10(a) and 230.10(d)). Our scoping comments further recommended that the following information be included in the DEIS, and we reiterate that this information should be included in the FEIS.

We also recommend that DTS meet with EPA wetlands staff and staff of the U.S. Army Corps of Engineers to discuss Section 404(b)(1) requirements. Please contact Wendy Wiltse of EPA's Honolulu office at 808-541-2752 to arrange a meeting.

Recommendations:

- Work with EPA and the Corps to acquire a jurisdictional delineation of waters of the United States and impacts to those waters in the project area.
- Demonstrate that all potential impacts to waters of the United States have been avoided and minimized. If these resources cannot be avoided, clearly demonstrate how cost, logistical, or technological constraints preclude avoidance and minimization of impacts.
- Quantify the benefits from measures and modifications designed to avoid and minimize impacts to water resources; for example, number of stream crossings avoided, acres of waters of the United States avoided, etc.

- Identify all protected resources with special designations and all special aquatic sites¹ and waters within state, local, and federal protected lands. Additional steps should be taken to avoid and minimize impacts to these areas.
- Identify and commit to mitigation for any unavoidable impacts. Include a timeframe for implementation of mitigation commitments along with the responsible party.

Water Quality

The DEIS states that a Water Quality Impact Assessment is underway, as required in areas that depend upon a sole source aquifer for drinking water. The results of this assessment should be included in the FEIS.

The DEIS also states that the project's consistency with the objectives and policies of the Hawaii Coastal Zone Management Program will be reviewed by the Department of Business, Economic Development & Tourism (DBEDT) Office of Planning. This review should be completed and documented in the FEIS.

While we support DTS's plan to implement permanent best management practices (BMPs) to manage stormwater runoff, we do not believe that there is sufficient information in the DEIS to document that the project will have no adverse impacts on water quality due to increased pollutants in stormwater. Additional information is needed in the FEIS to support the conclusion that there will be no adverse impacts to water quality. Where the proposed project will widen existing roads, the current stormwater detention basins and structures should be evaluated to determine if they will continue to be effective. We also recommend the use of green infrastructure as part of stormwater management. Detailed information about green infrastructure approaches is available at <http://cfpub.epa.gov/npdes/greeninfrastructure/technology.cfm>.

The FEIS should also include a discussion of other impacts the project may have on local hydrology, such as sediment transport, groundwater recharge, and flood attenuation, and how these impacts would be minimized or mitigated.

Recommendations:

- Include the results of the sole source aquifer water quality assessment in the FEIS and confirm that no significant impacts will result. Identify specific mitigation measures for any potential impacts.
- Include a discussion of the DBEDT Office of Planning review of the project's consistency with the Coastal Zone Management Program and confirm that the project is consistent with the program.

¹ Special aquatic sites are defined at 40 CFR 230.40 – 230.45 and include wetlands, mud flats, vegetated shallows, coral reefs, and riffle and pool complexes.

- Consider including green infrastructure in the permanent BMPs for stormwater management and document the BMPs in the FEIS.
- Identify the project's impacts on local hydrology, such as sediment transport, groundwater recharge, and flood attenuation in the FEIS rather than waiting to analyze these impacts at a future date. Include specific mitigation commitments in the FEIS and identify how these mitigation actions will reduce impacts to surface hydrology. Include an analysis of potential hydrological impacts due to the reasonably foreseeable future extensions of the proposed project.

Noise Impacts

The DEIS, including the visual impact simulations, indicate that residents in a number of areas may experience significant noise impacts due to the proximity of the project to homes. EPA encourages DTS to consider noise abatement measures not specified in the DEIS, such as noise insulation of receptor sites.

EPA also recommends that particular attention be given to potential noise impacts and mitigation in the vicinity of Pearl Harbor and the USS Arizona Memorial.

Recommendations:

- Consider additional noise abatement measures, such as noise insulation of receptor sites, for residences and other sensitive receptors that would experience noise impacts. Provide quantitative information in the FEIS on the decrease in noise impacts from additional mitigation strategies.
- Provide additional noise mitigation in the vicinity of Pearl Harbor and the USS Arizona Memorial, if necessary to preserve the contemplative nature of the site.

Environmental Justice

EPA previously provided feedback on the environmental justice (EJ) analysis methodology proposed for this project, which was based on the Oahu Metropolitan Planning Organization's method for determining EJ areas. While we believe that the DEIS appropriately identifies EJ areas, we have concerns about the proposed relocation of residents of the Banana Patch community, which is identified in the DEIS as an EJ area of concern. We encourage DTS to choose an alternative alignment that would avoid relocation of this community. If no reasonable avoidance alternative exists, EPA recommends that extensive efforts be made to communicate and consult with the community in planning and implementing the project, and that all past and future consultation activities with this community be documented in the FEIS.

In addition, EPA recommends that additional assistance be provided to any other residents of environmental justice communities who will be relocated.

Recommendations:

- Identify an alternative alignment that would avoid the Banana Patch community and alter the proposed action to accommodate this modification.
- Document the content and outcomes of the community meeting held with the Banana Patch community, as well as any other past or planned communication with the community, in the FEIS.
- Identify and commit to specific mitigation measures to minimize the impacts of relocation on low-income and minority populations.
- Conduct interviews with all potential displacees who have special needs to ensure that issues are fully identified and a plan for assistance is prepared. Based on the results from these interviews, identify and commit to additional measures to minimize the impacts of relocation, such as providing translation services, transportation to visit potential replacement housing, and/or additional relocation specialists to work with these communities.

Section 106 Consultation

The DEIS states that Section 106 consultation is ongoing. The consultation process should be completed prior to release of the FEIS and the process and required mitigation should be documented. This is critical to the determination of whether the project will have significant impacts on historical resources.

Recommendation:

- Complete the Section 106 process and document all related mitigation commitments in the FEIS. Confirm in the FEIS that the Section 106 consultation process included analysis of potential impacts from the reasonably foreseeable future action of the proposed extension of the project. Identify what, if any, additional impacts to historical properties may occur with future extensions of the project.

Invasive Species

EPA's January 6, 2006 and April 13, 2007 scoping comments included recommendations for minimizing the spread of invasive species. The islands of Hawaii are particularly vulnerable to invasive species, and construction associated with the project has the potential to aid in the establishment of invasive plants along any newly disturbed corridors. We reiterate our recommendations below and request that they be addressed in the FEIS.

Recommendations:

- In accordance with Executive Order 13112, identify proposed methods to minimize the spread of invasive species and utilize native plant and tree species where revegetation is planned.

- Coordinate invasive species management with local agencies and organizations, such as the Oahu Invasive Species Committee: a voluntary partnership organized to prevent new invasive species infestations on the island of Oahu, to eradicate incipient invasive species, and to stop established invasive species from spreading on Oahu (<http://www.hear.org/oisc/>).
- Coordinate measures to reduce the potential for the spread of invasive species with other ongoing planning efforts. Additional resources related to Federal and State programs to address invasive species can be found at: <http://www.invasivespeciesinfo.gov/>

Visual Impacts

The DEIS indicates that there may be significant visual impacts resulting from the project. Context sensitive design can be used to mitigate these impacts.

Recommendation:

- Utilize context sensitive design, including neighborhood-based design guidelines and community input, as much as possible to mitigate the project's visual impacts.

Climate Change

Research on global climate change indicates that many coastal areas may be impacted in the future by sea level rise. The IPCC projects that global sea level will rise between 7 and 23 inches by the end of the century (2090–2099) relative to the base period (1980–1999). According to the IPCC, the average rate of sea level rise during the 21st century is very likely to exceed the 1961–2003 average rate. Storm surge levels are also expected to increase due to projected sea level rise. Combined with non-tropical storms, rising sea level extends the zone of impact from storm surge and waves farther inland, and will likely result in increasingly greater coastal erosion and damage.²

Recommendation:

- Include a discussion in the FEIS of the potential impacts of climate change on the proposed project and identify adaptive management strategies to protect the project area from those impacts.

² IPCC, 2007b: Summary for Policymakers. In: *Climate Change 2007: Impacts, Adaptation and Vulnerability. Contribution of Working Group II to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change* [Parry, M.L., O.F. Canziani, J.P. Palutikof, P.J. van der Linden and C.E. Hanson (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA.

From: WCOASTJOHN@aol.com [mailto:WCOASTJOHN@aol.com]
Sent: Fri 2/6/2009 5:06 PM
To: wyosioka@honolulu.gov
Cc: Matley, Ted <FTA>
Subject: Draft Environmental impact Statement (EIS) for Honolulu HCTP

The Draft Environment Impact Statement for the city's rail transit project is unacceptable because it is written solely for a steel wheel on steel rail system. There are other forms of fixed rail that may be better and more cost-effective than steel wheels. Please rewrite the EIS to cover the other technologies, such as monorail and maglev, to ensure that the city can and will obtain the best and latest technology at the best price. Unlike the continental US States we don't have a rail system to add to we are starting from scratch, so why not try and get the best for the buck?

Very respectfully,
John Ridings

Great Deals on Dell Laptops. Starting at \$499.
(<http://pr.atwola.com/promoclk/100000075x1217883258x1201191827/aol?redir=http://ad.doubleclick.net/clk;211531132;33070124;e>)

RECORD # 693 DETAILS

Status : Initial Action Needed
Creation Date : 2/16/2009
Creator Affiliation : Other
First Name : Irwin
Last Name : Kawano
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 00000
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Other
Other Submission Method : Transcript - Banana Patch Community Meeting
Submission Date : 01/24/2009
Submission Content/Notes : My name is Irwin Kawano. What I wanted to ask was, when is this going to take place? When do we get the appraisal so we know how much money we are going to get and by when we have to move out, you know? That's, I think, the basic question that we got to know right now, if possible.

Reply Requested :
Submission Type : Question
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :
FOIA Response Date :

RECORD # 694 DETAILS

Status : Initial Action Needed
Creation Date : 2/16/2009
Creator Affiliation : Other
First Name : Evelyn
Last Name : Kawano
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 00000
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Other
Other Submission Method : Transcript - Banana Patch Community Meeting
Submission Date : 01/24/2009
Submission Content/Notes : I'm Evelyn Kawano and I would like to know how the fair market value is determined as to the property and the house?
Reply Requested :
Submission Type : Question
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :
FOIA Response Date :

RECORD # 695 DETAILS

Status : Initial Action Needed
Creation Date : 2/16/2009
Creator Affiliation : Other
First Name : Evelyn
Last Name : Kawano
Business/Organization :
Address :
Alternative Preference :
Apt./Suite No. :
City :
State : HI
Zip Code : 00000
Email :
Telephone :
Telephone Extension :
Add to Mailing List : None
Submission Method : Other
Other Submission Method : Transcript - Banana Patch Community Meeting
Submission Date : 01/24/2009
Submission Content/Notes : I want to make one more then, because I'm looking at the home prices now and it seems as though the prices are lower, so are we able to go and look on our own, also, and have someone appraise our property earlier if we find something? Or how soon can we go out and we can go and look for homes on our own?

Reply Requested :
Submission Type : Question
FOIA (Freedom of Information Request) Request : No
FOIA Referral Date :
FOIA Response Date :



LIFE OF THE LAND

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February 6, 2009

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

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

Katherine Puana Kealoha
Office of Environmental Quality Control (OEQC)
235 South Beretania, Suite 702
Honolulu, HI 96813

re: Honolulu High-Capacity Transit Corridor Project (DEIS)

Submitted pursuant to 49 USC 1610 et. seq., 16 USC 470(f), 49 USC 303,
42 USC 4332(2)(c), 23 CFR 771, and Hawaii Revised Statutes Chapter 343

Life of the Land is Hawai'i's own energy, environmental and community action group advocating for the people and `āina for almost four decades. Our mission is to preserve and protect the life of the land through sound energy and land use policies and to promote open government through research, education, advocacy and, when necessary, litigation.

This document is a joint NEPA and Hawai'i Revised Statutes Chapter 343 Draft EIS.
(Preface II)

The Council on Environmental Quality, as part of its oversight of

Life of the Land Comments re Honolulu Rail Line Draft EIS * 1

implementation of the National Environmental Policy Act, held meetings in the ten Federal regions with Federal, State, and local officials to discuss administration of the implementing regulations. The forty most asked questions were compiled in a memorandum to agencies for the information of relevant officials. In order efficiently to respond to public inquiries this memorandum is reprinted in this issue of the Federal Register.

<http://www.nepa.gov/nepa/regs/40/40p1.htm>

In response to the many requests from the agencies and other participants, CEQ has compiled forty of the most important or most frequently asked questions and their answers and reduced them to writing. The answers were prepared by the General Counsel of CEQ in consultation with the Office of Federal Activities of EPA. These answers, of course, do not impose any additional requirements beyond those of the NEPA regulations. This document does not represent new guidance under the NEPA regulations, but rather makes generally available to concerned agencies and private individuals the answers which CEQ has already given at the 1980 regional meetings. (www.nepa.gov/nepa/regs/40/40p2.htm)

NEPA's Forty Most Asked Questions
(www.nepa.gov/nepa/regs/40/40p3.htm)

2a. Alternatives Outside the Capability of Applicant or Jurisdiction of Agency. If an EIS is prepared in connection with an application for a permit or other federal approval, must the EIS rigorously analyze and discuss alternatives that are outside the capability of the applicant or can it be limited to reasonable alternatives that can be carried out by the applicant?

A. Section 1502.14 requires the EIS to examine all reasonable alternatives to the proposal. In determining the scope of alternatives to be considered, the emphasis is on what is "reasonable" rather than on whether the proponent or applicant likes or is itself capable of carrying out a particular alternative. Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.

2b. Must the EIS analyze alternatives outside the jurisdiction or capability of the agency or beyond what Congress has authorized?

A. An alternative that is outside the legal jurisdiction of the lead agency must still be analyzed in the EIS if it is reasonable. A potential conflict with local or federal law does not necessarily render an alternative unreasonable, although such conflicts must be considered. Section 1506.2(d). Alternatives that are outside the scope of what Congress has approved or funded must still be evaluated in the EIS if they are reasonable, because the EIS may serve as the basis for modifying the Congressional approval or funding in light of NEPA's goals and policies. Section 1500.1(a).

1. Is it reasonable to consider an at-grade (ground-level) rail system? Please elaborate.
 2. Please list each document and the number of pages in each of those documents that considered an at-grade (ground-level) rail system.
 3. Is it reasonable to consider an enhanced express bus system? Please elaborate.
 4. Please list each document and the number of pages in each of those documents that considered an enhanced express bus system
 5. What rail segments did you consider at the ground level? Please discuss each segment and why it was rejected.
 6. Why were specific ground level rail segments were rejected and why? Please discuss each segment and why it was rejected.
 7. What is the relative cost for ground-based and elevated rail for each segment?
 8. Is there sufficient space along Farrington Highway for a ground-based track system?
 9. Is there sufficient space along the H-1 in the Kapolei-Ewa area for a ground-based track system?
 10. What would be impact of using an existing lane of Farrington Highway for a rail line?
 11. Did you consider an above-ground line in Kapolei-Ewa becoming at-grade in the greater Waipahu area? Please elaborate.
 12. Would it be better to have the train go directly to Leeward Community College or should the college be fed by a spur track?
 13. How many additional riders would take the train if it stopped at Leeward Community College? Please elaborate.
 14. Would it be better to have the train go directly to Waipio and Mililani or should Central Oahu have a spur track? Please elaborate.
- How would a separate line, or a spur line, from Central O`ahu to this proposed line impact ridership:
15. How many additional riders would take the train if it stopped at Waipio?
 16. How many additional riders would take the train if it stopped at Mililani?
 17. Is there sufficient space in the land just makai of Kamehameha Highway in the Pearl Highlands Center, Pearl City Shopping Center and the Pearl Ridge Shopping Center area for at least one rail track?
 18. Is there sufficient space in the land just mauka of Kamehameha Highway in the Pearl Highlands Center, Pearl City Shopping Center and the Pearl Ridge Shopping Center area for

- at least one rail track? two tracks?
19. Is there sufficient space in the land just mauka of Kamehameha Highway in the Pearl-Harbor-Hickam area for at least one rail track? two tracks?
 20. Is there sufficient space in the land just makai of Kamehameha Highway in the Pearl-Harbor-Hickam area for at least one rail track? two tracks?
 21. Should there be a spur route into Pearl Harbor? Please elaborate re ridership.
 22. How many additional riders would take the train if there were a spur rail line into Pearl Harbor Naval Station? Please elaborate re ridership.
 23. Should there be a spur route into Hickam Air Force Base?
 24. How many additional riders would take the train if there were a spur rail line into Hickam Air Force Base? Please elaborate re ridership.
 25. Should the rail line go into Honolulu International Airport? Please elaborate re ridership. How would security be affected with a rail line displacing vehicle flows into the airport? What reductions in idling time by vehicles would be anticipated?
 26. Should there be a rail loop at Honolulu International Airport, which could act as the beginning/end for trains going towards Honolulu or Ewa? Please elaborate.
 27. Could the Airport Rail Loop end at Aloha Stadium and intersect the Ewa-Honolulu Rail Line at a transfer station? Please elaborate.
 28. How many additional riders would take the train if stopped at Honolulu International Airport? Please elaborate.
 29. How many additional riders would take the train if there were a loop around Honolulu International Airport? Please elaborate.
 30. How many cars could park at Aloha Stadium during the day from Monday-Friday? Please elaborate. Please list all documents the City reviewed or wrote regarding this concept.
 31. When did the City considered consider converting one or more lanes of the Nimitz near Iwilei to non-vehicular traffic only? Would this save money, using existing paved roads for the transit system?
 32. Could one or more lanes of the Nimitz be used for a rail line?
 33. Could the Rail Line go into Sand Island and then via a tunnel to the Homeless Shelter-Medical School area? Could a park-and-ride rail station be built in this area?
 34. What is the comparative costs associated with an above ground and a below ground route through Chinatown? What is the comparative costs associated with an above ground and a below ground route along the Nimitz?

35. Did the City consider a route along the Ala Moana Blvd edge of Ala Moana Park?
36. Did the City consider a route along the edge of the Ala Wai Golf Course? Why or why not? What impact would this have on ridership?
37. What ground routes did consider going to any portion of the University of Hawai'i at Manoa Campus? Why or why not? What impact would this have on ridership?
38. How many additional riders would take the train if it stopped at the University of Manoa? Why or why not? What impact would this have on ridership?
39. How many additional riders would take the train went to Waikiki? Why or why not? What impact would this have on ridership?
40. Will the rail line enable greater transportation options?
41. Will these greater transportation options lead to faster population growth rates?
42. What would be the comparable ridership levels if the rail line were build from west-to-east OR east-to-west?
43. Will the transit system be encouraged that high population densities around built around transit stations?
44. How will this impact population growth projections?
45. Will land owners around planned transit stops get new development rights which will increase their property values?
46. How much will property values rise on Oahu due to the new transit stops?
47. Which Chinatowns in the U.S. or elsewhere had overhead transit lines built?
48. How did this affect those Chinatowns?
49. What analysis has been done concerning new dark spaces created by overhead transit and any change in crime, criminal behavior or potential crime?
50. Will areas under the transit line be barbed wired to prevent homeless from gathering along the route?
51. How will the rail line impact the uses of bicycles?
52. How much money has been spent by (a) the City; (b) by contractors and (c) by subcontractors in public relations regarding this proposal?
53. Please provide a list of each government-funded or partially government-funded entity and the amount of money they spend on public relations / advertisement regarding this proposed system.

54. Will this proposed system increase or decrease the time until another major transit upgrade is needed?

55. What is the likelihood of insufficient ridership to make the system worthwhile?

56. Is the excise tax increase regressive?

Any system that is built uses energy and releases greenhouse gases (carbon equivalence) during both the construction phase and the use phase. This information can be broken down into total use/released and per rider use/release

57. In terms of building the system: How much energy will be used?

58. In terms of building the system: How much energy per anticipated rider will be used?

59. In terms of building the system: How many tons of carbon equivalence is required

60. In terms of building the system: How many tons of carbon equivalence will be used?

61. In terms of building the system: How many tons of carbon equivalence will be used?

62. In terms of operating the system:: How much energy per anticipated rider will be used?

63. In terms of operating the system:: How many tons of carbon equivalence is required?

64. In terms of operating the system:: How many tons of carbon equivalence will be used?

65. In terms of operating the system:: How many tons of carbon equivalence will be used?

66. What fuel will be used to generate the electricity necessary to build this system?

67. What form of energy will power the system?

68. Assuming the transit system is built, what is the projected rise in the use of cars over the next ten and twenty years?

69. How many blue views of the ocean from residential units will be lost as a result of this system?

70. Will the transit system lead to a rise in population along the route?

71. What percent of that population rise will be from people not currently living in the state?

72. Should Honolulu build a single linear line or a network of intersecting transit lines?

73. How much faster can Ewa grow with the transit route installed as opposed to continuing the existing process without a transit system?

74. One Congressman testified before the State Legislature that building the line will enable tens of thousands of new homes in the Ewa region. How true is that statement?

75. How will pressure to develop agricultural lands be affected as a result of this project?

76. Will this project increase or decrease the likelihood that Hawai'i will become agriculturally self-sufficient? Please elaborate.

77. Will this project increase or decrease the likelihood that Hawai'i will become energy self-sufficient? Please elaborate.



Henry Curtis
Executive Director



STATE OF HAWAII
OFFICE OF HAWAIIAN AFFAIRS
711 KAPI'OLANI BOULEVARD, SUITE 500
HONOLULU, HAWAII 96813

HRD08/2156 K

February 2, 2009

Wayne Y. Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawai'i 96813

RE: Honolulu High-Capacity Transit Corridor Project, Draft Environmental Impact Statement/Section 4(f) Evaluation, Island of O'ahu, Honolulu and 'Ewa Districts

Aloha e Wayne Y. Yoshioka,

The Office of Hawaiian Affairs (OHA) is in receipt of the above-mentioned letter dated November 12, 2008. The Department of Transportation Services – City and County of Honolulu (DTS) has submitted a copy of the Draft Environmental Impact Statement/Section 4(f) Evaluation (Draft EIS) for the Honolulu High-Capacity Transit Corridor Project (Project) to our office for review and comment. OHA has reviewed the project and offers the following comments,

The Draft EIS was prepared pursuant to the National Environmental Policy Act (NEPA), Section 4(f) of the U.S. Department of Transportation Act of 1966, Hawaii Revised Statutes (HRS) Chapter 343 and the Hawaii Administrative Rules, Title 11, Chapter 200. The review of this Draft EIS was triggered by both state and federal environmental and transportation policy laws and thus our comments on this document will reflect these laws and policies. OHA would also like to note that Section 106 consultation, pursuant to the National Historic Preservation Act of 1966 (NHPA), has also been triggered by this proposed action and is being conducted concurrent to the Draft EIS/Section 4(f) Evaluation.

The Role of OHA

OHA has substantive obligations to protect the cultural and natural resources of Hawai'i for its beneficiaries, the people of this land. The HRS mandate that OHA "[s]erve as the principal public agency in the State of Hawaii responsible for the performance, development, and

coordination of programs and activities relating to native Hawaiians and Hawaiians; . . . and [t]o assess the policies and practices of other agencies impacting on native Hawaiians and Hawaiians, and conducting advocacy efforts for native Hawaiians and Hawaiians.” (HRS § 10-3)

By direction of the statutory mandates, OHA continues to conduct advocacy efforts to protect the traditional cultural landscapes of Hawai‘i. This includes the protection of archeological and historic resources, the perpetuation of traditional and cultural practices, and the continued health of our terrestrial and marine ecosystems. The dialogue that has played out in the decision on whether the City should pursue the largest public works project in the history of the State of Hawai‘i has been controversial and widely publicized. OHA seeks not to weigh in on the controversial merits of development but seeks to assess the potential impacts that the Project will have on the landscape of the transit corridor.

Public Hearings for the Draft EIS

OHA is deeply concerned with format of the public hearings during the Draft EIS process. The public meetings were scheduled for 2 hours, but the local media reported that the first meeting on December 6, 2008 ended after thirty-one minutes. It was also reported that only ten residents offered testimony during the first meeting on December 6, 2008. OHA staff was able to attend the December 11, 2008 public hearing for the Draft EIS at Bishop Museum at 6:00pm. The meeting started shortly after 6:00pm with public comments being accepted at 6:05pm after a brief introduction by the project staff. After three members of the public offered testimony, the public hearing was officially closed at 6:12pm.

Our staff is concerned that members of the public who were not able to make it to the meetings on time may not have been afforded the opportunity to comment during these public meetings. Residents are often faced with many hardships, have many responsibilities and time commitments, may go to great lengths in order to attend public meetings, and are not always able to make the meetings precisely on time. The public should have been allowed to offer comments on the proposed project during the full two hours that was allotted and advertised for public comment.

Archeological, Cultural, and Historic Resources

Archeological, cultural, and historic preservation laws and regulations provide a regulatory context from which these resources will be identified, evaluated, and treated. As the Project is federally regulated by the NHPA, and its implementing regulation 36 CFR 800, an early determination of “adverse effects toward historic properties” was determined by the DTS and the Federal Transit Authority.

As a result of the determination of “adverse effects toward historic properties”, a Memorandum of Agreement (MOA) is being developed to address the adverse effects toward historic properties. According to the consultation process described in the EIS, the process would involve the State Historic Preservation Division (SHPD) and other consulting parties in discussions regarding adverse effects on historic properties resulting in an MOA.

To our knowledge, consultation with the SHPD and the O'ahu Island Burial Council (OIBC) has been taking place in recent months and the development of an MOA has been progressing. OHA asks that our office be included as a consulting party to the MOA, as OHA is a specifically named Native Hawaiian Organization in the NHPA. As Section 106 consultation has commenced with our office, we further request that consultation continue with our agency. Early and continued consultation with all parties of the MOA shows a proactive effort is being made by the lead agencies responsible for consultation under Section 106 regulations.

According to the Draft EIS, a phased approach to identify archeological resources, including burials will be used in the Project. As a phased archeological inventory survey will be completed as the project commences, the extent of archeological resources that may be present is yet to be seen. Therefore, a Programmatic Agreement (PA) is being developed by the leads of the Project which will stipulate the full extent of responsibilities prior to each construction phase, identify invited concurring signatories, and provide direction on mitigation of adverse effects. OHA would like to be offered an opportunity to review and provide comment on the PA upon its completion.

Mitigation measures for any potential archeological resources that may be affected during construction include archeological monitoring, preserving archeological resources, and burial treatment. Subsurface archeological resources including burials could be impacted by construction. OHA advocates for archeological monitoring in any ground disturbing activities associated with the project. At the very least, archeological monitoring should be performed in areas identified with a "Moderate" and "High" rating. Because an archeological monitoring plan is yet to be drafted and released we request to be provided this plan for review and comment upon completion. An approved archeological monitoring plan pursuant to the MOA should be enacted to set up a process to handle any archeological resources or iwi kūpuna that may be unearthed during construction.

OHA request DTS's assurances that should iwi kūpuna or Native Hawaiian cultural or traditional deposits be found during the construction of the project, work will cease, and the appropriate agencies will be contacted pursuant to applicable law. OHA would also like to be notified at that time.

Natural Resources

During early consultation for this project, concerns were expressed about the ko'oloa'ula (*Abutilon menziesii*), commonly known as the red 'ilima. The ko'oloa'ula is an endangered plant which is known to inhabit areas of Kapolei. The federal government is currently implementing a conservation plan for this endangered plant. OHA notes that the proposed project would encroach into within 200 feet of an established contingency reserve contained within a habitat conservation plan of these endangered plants. (DEIS, page 4-119) OHA realizes that mitigation measures have been specified for this habitat conservation plan that include future developments; however, we recommend that the incidental take license be reviewed to ensure that this particularly large and unique proposal will comply with specified measures previously determined. Therefore, we urge that the DTS reconsider their assertion of a finding of no effect

on any threatened, endangered or protected species (DEIS, page 4-125) until this is done. Also, has the DTS consulted with the U.S. Fish and Wildlife Service regarding seabird attraction preventative measures and incorporated them into their design plans? We would like to see a copy of DTS's Section 7 consultation.

Contaminated Sites

As the DEIS states on page 4-113, there are a number of properties proposed to be used that are contaminated. DTS should assess whether chemicals of potential concern are present in shallow soil or groundwater at these sites. If allowed to go forward, remediation of the contaminated areas before deconstruction will likely be necessary. Additionally, long-term biological and chemical monitoring should be established to measure any change in contaminant levels over time and the associated biological response.

OHA does appreciate that DTS proposes permanent best management practices (BMPs) to address water quality that include an inspection and maintenance plan to ensure that they are attaining their objectives. (DEIS, page 4-132)

Stormwater

Generally, OHA wishes to see stormwater as a resource to be captured and conserved rather than a nuisance to be channeled and drained away. The use of permeable paving materials can be used to retain some of the rain that falls, and catch basins can capture and help to slow the runoff thereby reducing turbidity. We hope that DTS can incorporate these ideas into their water management system, which already includes some of these concepts.

Pearl Harbor National Wildlife Refuge and Wetlands

OHA notes that the Pearl Harbor National Wildlife Refuge is listed habitat for endangered fauna and it exists within the project corridor. (DEIS, pages 4-123) In fact, DTS proposes to put a possible "maintenance and storage facility" (DEIS, page 4-132) a mere 1,000 feet from this protected habitat. OHA appreciates that the wetlands are to remain intact (DEIS, page 4-126); however, this in no way ensures that there will be no adverse effects to them.

For example, OHA sees that DTS proposes to fill in some wetlands. (DEIS, page 4-128) We also point out that the Draft EIS plainly states that this "maintenance and storage facility will include an increased level of BMPs because it would be the system's most industrial facility." (DEIS, page 4-132, emphasis added) OHA urges that strict BMPs should apply to this type of facility no matter where it is located and that since this is a "possible" location, placing it next to endangered species habitat is not the best citing for it. We recommend that alternative locations be analyzed in the EIS.

OHA seeks clarification that the classification of the receiving state waters for this estuary is Class 2. As such, we point out that DTS must be aware of the obligations to protect these waters for recreation, aquatic life (and wildlife), water supplies, and that any discharge must receive the best degree of treatment compatible with this class. Further, no new treated sewage discharges shall be permitted within estuaries. OHA notes that the Pearl Harbor estuary

will be impacted by this proposal and regardless of the current state of the water quality of any of the receiving waters; it is not to serve as an excuse for DTS to shirk their obligations. We also ask about compatibility with section 320 of the Clean Water Act and its associated National Estuary Program.

Energy

OHA would also like to point out that Hawai'i is re-inventing its energy portfolio. As such, DTS should consider that by 2020, 20% of Hawai'i's electricity is to be from renewable sources. Further, on January 28, 2008, Assistant Secretary of the Department of Energy and Governor Linda Lingle signed a groundbreaking Memorandum of Understanding (MOU) between the state government and the U.S. Department of Energy's Office of Energy Efficiency and Renewable Energy. The MOU estimates that Hawai'i can potentially meet between 60 and 70 percent of its future energy needs from clean, renewable energy sources.

As such, the legislature has recommended applicants consider the Leadership in Energy and Environmental Design (LEED) Green Building Rating System, which is the nationally accepted benchmark for the design, construction, and operation of high performance green buildings. OHA recommends the use of photovoltaic and small wind harvesting electrical generation for peripheral uses such as parking lot lighting. Solar energy should also be incorporated into the building plans. During construction, OHA urges the use of recyclable materials: steel studs and structural members, and wood products from certified sustainable sources. Landscaping should include native species and large trees to provide shade and cooling to buildings as well as parking lots. Additionally, state agencies are regulated by HRS §196-9 dealing with energy efficiency and environmental standards for state facilities, motor vehicles, and transportation fuel. Although the DTS is not obligated to adhere to this statute, as it is not a state agency, any efforts by your agency to comply with the standards set forth in the statute would show a good faith effort to minimize the impact that the Project will have on energy consumption.

Environmental Justice Concerns

OHA expresses some concern over the situation with the 100 percent minority Banana Patch community that will be dramatically affected by this proposal. OHA agrees that this community is unique and we recognize that this tight-knit community has been living there for generations. Displacement of this entire community is something that will have to be adequately addressed. We also point out that the residents of this area (who do not have access to basic infrastructure services such as water and sewage) are living in multi-generational housing, mainly as a result of economic circumstance, not so much as a result of cultural influences. (DEIS, page 4-55)

Signage as a Tool for Preservation

When cultural resources are affected, effective documentation of the resources and the cultural landscape in which it is located in should be considered as a mitigation measure. Signage related to the preservation of resources or the location of a relocated or displaced resource should be considered in order to preserve the history and culture of a landscape. This

mitigation measure could also have the potential to develop economic or community-based activities which would benefit the local communities that will be affected by the Project. Consultation regarding this matter could be conducted with local community organizations and local Hawaiian Civic Clubs.

Visual and Aesthetics Concerns

There is no doubt that the Project will create and produce visual and aesthetic effects on the landscapes within the transit corridor. Mitigation measures discussed in the DEIS focus on preserving visual resources and enhancing the project design to comply with applicable policies. The DEIS includes measures to consult with the communities surrounding each station for input on station design elements. OHA supports this measure and recommends consultation with each respective community's Neighborhood Board and Hawaiian Civic Club.

Many residents have expressed concerns over the visual and aesthetic impacts that the proposed project will have on the landscape. As a form of mitigating the effects the proposed project will have on the cultural landscape, we advocate that native plants should be incorporated into the landscaping and vegetation plans around the rail transit corridor including the transit stations when at all possible. Landscaping with native plants furthers the traditional Hawaiian concept of mālama 'āina and creates a more Hawaiian sense of place. This concept is one small way the cultural landscape can be preserved in an urban setting.

Thank you for the opportunity to comment. If you have further questions, please contact Jason Jeremiah by phone at (808) 594-1816 or e-mail him at jasonj@oha.org.

‘O wau iho nō me ka ‘oia‘i‘o,



Clyde W. Nāmu‘o
Administrator

C: Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, California 94105

Katherine Puana Kealoha, Director
Office of Environmental Quality Control
Hawai‘i State Department of Health
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813



Preserving America's Heritage

January 27, 2009

Mr. Leslie T. Rogers
Regional Administrator
Federal Transit Administration Region IX
201 Mission St., Suite 1650
San Francisco, CA 94105-1839

*RE: Honolulu High-Capacity Transit Corridor Project
Honolulu, Hawaii*

Dear Mr. Rogers:

Consulting parties have recently contacted the Advisory Council on Historic Preservation (ACHP) with concerns about the effects of the referenced undertaking on historic properties, particularly visual effects that may result to the Pearl Harbor National Historic Landmark (NHL). The extent and complexity of the planned undertaking calls for the Federal Transit Administration (FTA) to provide appropriate guidance and oversight to its applicant, the City and County of Honolulu Department of Transportation Services (City) to ensure that consulting parties and other stakeholders are involved in consultation in keeping with the spirit and intent of the Section 106 implementing regulations, "Protection of Historic Properties" (36 CFR Part 800).

We would like to confirm our understanding that the FTA has not yet circulated a finding of effect for this undertaking as the City is presently conducting additional study and analysis of effects to historic properties in response to comments received from consulting parties during the recent circulation of a Draft Environmental Impact Statement (DEIS) for the project. Should the FTA conclude, following the results of this additional analysis and consultation with the Hawaii SHPO and other consulting parties, that the undertaking will adversely affect historic properties, or that the development of a Programmatic Agreement is necessary, the agency must notify the ACHP and provide the documentation detailed at 36 CFR § 800.11(e). The Hawaii State Historic Preservation Office (SHPO) has raised concerns about the proposed development of two Section 106 agreement documents should adverse effects result from the proposed undertaking. It is unclear to us how the FTA has proceeded to this point without ongoing consultation with all consulting parties. Further, we wish to clarify that, per the provisions of §800.6 of our regulations, a Section 106 agreement document should address all the adverse effects that may result from an undertaking. It therefore is inconsistent per 36 CFR Part 800 for the FTA to develop two agreement documents for this single undertaking.

ADVISORY COUNCIL ON HISTORIC PRESERVATION

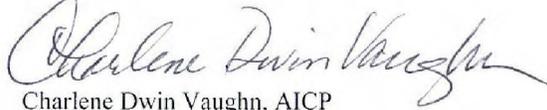
1100 Pennsylvania Avenue NW, Suite 803 • Washington, DC 20004
Phone: 202-606-8503 • Fax: 202-606-8647 • achp@achp.gov • www.achp.gov

AR00058154

We request an update on the status of the Section 106 consultation for the Honolulu High-Capacity Transit Corridor as well as information about how the FTA is providing oversight to the City regarding the coordination of the historic preservation review and consultation with all consulting parties, including Native Hawaiian organizations. This information will help us respond to inquiries from consulting parties and members of the public who express concerns about the FTA's Section 106 coordination. We will also be able to better advise the FTA regarding interpretation of the regulations and procedural requirements.

We look forward to your response and to assisting the FTA with its responsibilities under the National Historic Preservation Act. If you have any questions, please contact Blythe Semmer by telephone at (202) 606-8552 or by e-mail at bsemmer@achp.gov.

Sincerely,



Charlene Dwin Vaughn, AICP
Assistant Director
Office of Federal Agency Programs
Federal Permitting, Licensing, and Assistance Section

From: Kealoha, Katherine P. [mailto:Katherine.Kealoha@doh.hawaii.gov]
Sent: Monday, December 08, 2008 6:13 PM
To: Roberts, Stephanie L
Subject: DEIS Comments

Aloha Stephanie:

Attached are the initial comments from OEQC, can you please give me call after you have reviewed them?
My numbers are 586-4185 and 265-1796.

Thanks so much! Aloha- Kathy

2/17/2009

1. Relationship of the Proposed Action to Land Use Plans, Policies and Controls for the affected area.

Please expound on the paragraph on page 4-164. In accordance with Section 11-200-17(h), Hawai'i Administrative Rules, please discuss if there are any conflicts or inconsistencies in the proposed project. If so, please discuss the reasons that you plan to proceed notwithstanding the absence of full reconciliation.

In Section 4.17.10 on page 4-164, pursuant to Section 11-200-17(j), Hawai'i Administrative Rules, please discuss the extent to which the proposed project would foreclose future options and the extent to which the proposed project would narrow the range of beneficial uses of the environment or pose long-term risks to health and safety.

2. Status of Necessary Approvals

Table 4-37 on page 4-176 presents the list of necessary approvals. Pursuant to Section 11-200-17(h), Hawai'i Administrative Rules, please also indicate the status of each approval.

3. Resources – Irreversible and Irretrievable Commitments

In Section 4.19 on page 4-175, pursuant to Section 11-200-17(k), Hawai'i Administrative Rules, please expound on the existing text by considering “resources” only as “energy, construction materials, and labor.” The rule notes that “resources” also means natural and cultural resources committed to loss or destruction by the action.

4. Recommendation – Summary Table of Probable Unavoidable Adverse Environmental Effects

Section 11-200-17(l), Hawai'i Administrative Rules states in pertinent part that “[t]he draft EIS shall address all probable adverse environmental effects which cannot be avoided. It would be helpful if the EIS included a table summarizing these unavoidable probable adverse environmental effects

5. Mitigation of Hazardous Materials or Wastes, Potential Toxic Tort Liability Issues

Pursuant to Section 11-200-17(m), Hawai'i Administrative Rules, with respect to mitigation for impacts from hazardous materials and/or wastes, Section 4.11, on page 4-113, notes that the City would perform partial or complete Phase I Site Assessments in accordance with American Society for Testing and Materials protocol E1527-05. Please discuss what measures the City would take with respect to remediation and/or removal of the offending hazardous materials or wastes contamination prior to property acquisition.

6. Mitigation in General

With respect to mitigation measures in general, please discuss measures to reduce significant, unavoidable, adverse impacts to insignificant levels and the basis for considering these levels acceptable. Also, where a particular mitigation measure has been chosen from among several alternative mitigation measures, please discuss each alternative measure and disclose the reasons for choosing a particular one. Please discuss the timing of each step in any mitigation process. Please disclose what performance bonds (if any) may be posted, as well as provisions proposed to assure that the mitigation measures will be taken.

7. Summary of Unresolved Issues with Discussion

Pursuant to Section 11-200-17(p), Hawai'i Administrative Rules, please include in a separate and distinct section in the EIS that summarizes unresolved issues and contains either a discussion of how such issues will be resolved prior to commencement of the action, or what overriding reasons there are for proceeding without resolving the problems.

217 Kailua Road
Kailua Hawaii 96734
Tel (808) 256 4713
E mail: gsp@hawaii.rr.com

Wayne Yoshioka
Director, DOTS
City and County of Honolulu
650 South King Street
Honolulu Hawaii 96813

February 5th, 2009

SUBJECT: Concerns about the draft Environmental Impact Statement (DEIS) for the proposed Honolulu Rail Transit System.

Dear Mr. Yoshioka:

Although I am an active member of the Honolulu Chapter of the American Institute of Architects this letter represents my personal opinions and should not be regarded as the official opinion or statement emanating from the Honolulu Chapter of the AIA. I have had my own Architectural firm since 1968 and have witnessed the progressive rising of construction costs here in Hawaii. Since no major overhead rail system has been built in the United States for many years there has to be little confidence in obtaining a realistic cost comparison when projecting the costs of the current rail project. Preliminary engineering costs are but a shot in the dark. There are many obstacles ahead that will increase the present estimate. These include soil testing (lava tubes or unsuitable ground conditions), Hawaiian Burial sites, higher property acquisition costs, litigation, and the extensive relocation of utilities to name a few. Major construction projects on the mainland have generally increased by forty or more per cent from original estimates. The final cost will only be established when final construction drawings are prepared, and even then one can expect many change orders.

There are so many inaccuracies in the above referenced document that it is hard to decide just where to begin in setting out a sound response to its many flaws. Before listing these many shortfalls it is important to state up front that in spite of the results of the recent election, forty nine percent of Oahu residents did not vote in favor of the project. This happened in spite of millions of taxpayer dollars being spent by the city on fraudulently false propaganda. One of the most outlandish claims hurled at the voters on television and radio prior to the election was the heralding of the success of the Charlotte rail system. That system is a LIGHT RAIL AT GRADE rail line and is nothing remotely similar to the proposed Honolulu project. I notice that even now in the City's "On The Move" newsletter of January 26th there continues to be praise for the LIGHT RAIL on grade Phoenix rail line which again has no similarity to the one that is proposed in the draft EIS. Both local daily newspapers heavily endorsed the scheme together with local politicians and a pro rail group partially financed by Parsons Brinkerhoff interests. In contrast the opponents of the project were greatly disadvantaged by having just limited grass roots financing and were only able to purchase very limited media advertising. And yet they still garnered almost half of the total election votes opposing the rail project as it now stands.

Perhaps the most glaring error in the slick advertising paid for by the taxpayers and aired relentlessly on TV and radio by the City was the showing of pictures of cars stalled in traffic. The draft EIS even admits (for once honestly!) that traffic will only get worse even with rail. Honolulu needs traffic relief NOW and the rail project does NOTHING to address that problem. The cold facts are that during construction over the next many years, with closing of lanes and disruption of businesses, traffic congestion will only be far worse. The State's newly revealed plans to add lanes to the H I freeway and its other extensive road improvement programs do at least address the traffic congestion problem. But this will result in a profusion of road closings caused by the competing projects.

How in the world as the draft EIS states can there be "No adverse affects to neighborhoods" when the proposed high level rail line overpowers each street that it penetrates virtually destroying the very heart and soul of the neighborhood. On the subject of neighborhoods it is relevant to reflect on the recent games played by the City Council on the Salt Lake Alternative. In order to obtain the deciding original vote to approve the project, the Councilman for the Salt Lake area forced the Council to route the rail through his district. Prior to the election there was a tremendous sales pitch on persuading the Salt Lake area residents to vote for rail. They did. And guess what!! Several days after the election the City Council decided to move the alternate alignment back to the airport. If voters in the Salt Lake area had known prior to the election that the routing through their community would be cancelled then the no rail vote might have persevered. In defense of the Salt Lake area Councilman it must be conceded that he is the one member who has concerns about the overall costs and who predicted that because of the lowering projections of the rail tax due to the current recession and a major drop off in tourist dollars that in a few years the rail project could be Two Billion dollars in arrears.

One of the most troubling sections in the draft EIS has been the failure to fairly address the alternative systems. A light rail system at grade is the preferred option in virtually every mainland city as it avoids the huge expense and aesthetic disaster of having an overhead rail system destroying the fabric of the historic urban area. It is simply not true that the light rail alternative at grade could possibly be more expensive than the proposed overhead rail project. The savings in having at grade stations would be considerable as there would be no need for escalators, elevators, stairs and the extensive concrete structures. Both the High Occupancy Hot Lanes (HOV) and the Transportation System Management Alternative (TSM) were also not adequately studied in the draft EIS. Both these systems have proven to be most successful in several mainland cities and would be far superior to the proposed overhead heavy rail project. They would also cost much less of taxpayers money and would be completed in a shorter time frame than the presently proposed system. The statement on Page 2-1 of the draft EIS contains a gross falsehood by stating that the proposed overhead rail system would cost less and have less environmental community impact than the alternative projects. Many of the people that voted for the rail project did not realize that the proposed Elevated third rail project has no comparison to the Charlotte rail project that was so brazenly praised in the many television and radio advertising paid for with taxpayer money.

The recently opened Phoenix Light Rail System should provide a serious eye opener to those people who still believe that the proposed third rail overhead system proposed in the draft EIS is the answer to Oahu's traffic problems. The Phoenix system cost one point four million dollars for a twenty mile light rail at grade system, of which almost half was paid for by the Federal Government. The Phoenix metropolitan area has a population of over four million, more than four times that of Oahu and their light rail system was completed in four years. The question is: why have the so called traffic experts burdened our city's taxpayers on this ill conceived project, costing (without future change orders) at least twice the cost of the Phoenix system. There are thirty five mainland cities that have chosen an on grade light rail system, whereas only one city, Miami, (in the nineteen seventies) has chosen an elevated heavy third rail solution. Cleveland, Ohio which is sixteenth in Metropolitan area population has a heavy rail system and no city between Cleveland and Honolulu, which is in fifty sixth place in population has an overhead rail system.

The draft EIS admits that the so called ideal corridor is but one mile wide in places with the mountains on one side and the ocean on the other. To support a train of this magnitude it is imperative to have many miles of heavy urbanized population on both sides of the rail corridor not just mountains and ocean. If people today still insist on commuting with one person to a car and decline the choice of car pooling or the express bus then there is little chance that in the future they would board the train with its many stops and much more limited freedom of movement. The ridership projections appear to be grossly overstated. The fact of Honolulu being the third most expensive city in country, after New York and San Francisco, has resulted in more people leaving the State than those coming in. The following statement in the draft EIS in chapter 4, page 4 "...would reduce transportation energy consumption" is a pure lie. The true fact is that Light Rail at grade would consume eight times less BTU's per hour.

There appears to be a total conflict of interest when having the main contractor on the project being the one to prepare the EIS, which in this case has resulted in the document becoming a highly suspect and prejudiced sales pitch in favor of the project. What is the point of even having an EIS if it is just to become a rubber stamp for the project. An independent EIS would have exposed the serious environmental and aesthetic concerns that this one does not honestly address. It is comforting to know that a recent press release from the City described the next contract to be signed for the project. Having spent weeks responding to the draft EIS we are now told that this new contract will be a feasibility and risk management report. If this is to be an independent study then there is hope that the proposed rail project should be terminated since an impartial study will reveal that the proposed rail project is far too expensive and will do little to solve traffic congestion, the sole reason for its development. With the recent lingering dispute over the EIS for the Super Ferry service it is interesting to note that the Ferry issue was primarily about the impact on whales, whereas the draft EIS for rail has a thousand times more impact as it will essentially destroy the whole character of urban Honolulu.

The proposed elevated rail system will have a devastating effect on the neighborhoods over which it will pass, in many cases displacing businesses and private property. The elevated stations and overhead concrete guideway will dominate the existing skyline resulting in a blocking of ocean and mountain views. The sound of an overhead train passing every few minutes will have a major impact on the lives of those people working or living in the immediate vicinity of its path. This will be extremely severe where it penetrates and destroys the present character of Dillingham Boulevard, Halekauwila street and the other streets as it proceeds towards Ala Moana Center. There will also be serious negative impingement to the character of Chinatown and an overpowering negative effect as it penetrates downtown passing Bishop Street, Aloha Tower and Irwin Park. Several years ago there was a concrete overhead structure at the foot of Bishop Street which was demolished resulting in opening up the view to the harbor. Other cities such as San Francisco, Baltimore and New York have also removed obstructive concrete structures near the waterfront in order to recover important view planes to the harbor.

In looking to the future it is relevant to consider the major financial burdens that are facing the New York Metropolitan Transit system., which has the highest ridership in America. The projected shortfall in millions of dollars is so critical that plans are afoot to lay off hundreds of workers, cut service on many of the routes, close down several stations, increase fares and charge tolls on all the presently free bridges in order to balance the budget. How can we even consider building this commuter train that will be running virtually empty for most of the day on an island just a small fraction of the size or population of New York. These mainland cities have major transportation projects already in place for many years and their financial problems are still severe although unlike Honolulu many of their systems have already been paid for.

With the almost daily breaks in the city's water lines and sewers and the serious eroding of the condition of the existing streets which have been neglected over the years it seems that these utilities are far more worthy of the spending of taxpayer money than the proposed heavy rail system which will do little to solve the traffic problems. On December 12th, 2008 there were nine serious overflows of sewage being spilt into almost all shorelines of Oahu, not exactly the environment that the millions of tourists expect when they come to Oahu. The excise taxes put aside for the transit project will be falling far short of projections due to the failing economy and downturn in the tourist industry. The public hearings have addressed many of these concerns to the City Council but unfortunately the testimony given from many well qualified professionals and concerned citizens has fallen on deaf ears and the project continues to move forward regardless.

Where did we go wrong? In 2004 the candidate for Mayor had a strong campaign slogan which was "Do We Need it, Can we Afford it, Can we Maintain it" Nothing about rail, which surfaced some year or two after his election. Fast forward to today and the question is the same, and the answer is a resounding "NO"

The removal of hundreds of trees to accommodate the project is simply not acceptable and the construction of heavy concrete columns down the center of existing streets will have a devastating effect on each neighborhood that it penetrates. The vast areas under the overhead concrete guide ways will become urban eyesores, devoid of landscaping and presenting an opportunity for homeless shelters and accompanying crime. Dillingham Boulevard, Halekauwila Street and all the other existing streets below the rail line will be reduced to a dark and dreary no mans' land similar to the existing portion of Nimitz Highway under the H-1 running past the airport. The proposed land acquisition is also a major concern as it will force many residents and businesses to relocate from their present neighborhoods.

In spite of these many concerns it is troubling that the draft EIS in chapter four, page six states: "Since there would be no adverse effects to neighborhoods, no mitigation is required". Another great concern is that although the future extensions to Manoa and Waikiki are shown on the draft EIS maps, there is no evaluation given to the enormous environmental impact that these future branch lines would impose on these very special areas of Honolulu. It appears to be extremely imprudent of the City to even contemplate starting construction without receiving approval for the entire system. If as an architect I am commissioned to design a project, and after many months of preliminary design, the client (the taxpayer) determines that the project does not meet the requirements of cost, aesthetics and the reason for the project (easing traffic congestion), then the contract should be mutually terminated.

It is surely time to pull the plug on this ill conceived poorly planned project that will bankrupt Honolulu both financially and aesthetically placing a huge burden of debt and sacrifice on our children and grandchildren in the years ahead. It is time to start planning immediately either on the development of a light rail system at grade, or to reconsider the benefits of the alternatives and coordinate with the State in expanding its plans to overhaul and improve our badly neglected highway system. The City Council's vote for "Steel on Steel" could still be valid, but only with an on grade light rail system similar to the one that the City has been praising in Charlotte and Phoenix. In responding to the many concerns submitted from many associations and private citizens it is time for the City to address those concerns and terminate the current contracts. Nine years is too long to wait for a project that is too expensive, does not solve our traffic problems and will forever destroy the character of our city.

Sincerely Yours



Geoffrey G., Paterson AIA Emeritus

Cc: Ted Matley FTA San Francisco
Governor Linda Lingle
Mayor Mufi Hanneman ✓
Todd Apo, Chair and members of the City Council of Honolulu City Council
Senator Dan Inouye
Senator Dan Akaka
US Representative Neil Abercrombie
US Representative Mazie K. Hirono
Laura Thielen DLNR
Colleen Hanabusa, Senate President
Calvin K. Y. Say, Speaker of the House

Is it possible to solve traffic congestion and keep Honolulu beautiful?

I believe that in the very near future that newer technology will make use of rail obsolete; that new technology use will make vehicles cleaner and environmentally friendlier than rail. Just look at how technology has improved our quality of life by making things run better and more efficiently. Electric autos, hydrogen fuel cell powered magnet guided buses and the sky tran using meglev will change the way we travel and protect our environment. Fossil fuel use in Hawaii drop significantly and be supplanted by the creation of energy using natural sources of energy found in abundance here aided by the efforts of the federal government and our governor.

Mass transportation using the Phileas magnetic guided bus for example uses GPS and magnets embedded in roads to guide buses on a concise path like rail automatically without need for steering. The bus will open with wide doors with its platform level with the curb height and within an inch of the curb to allow for wheelchair and children tram access without stepping into the street or need to climb stairs like conventional buses. This vehicle is currently being road tested by Caltran in California and is predicted one day to be operational in California and Oregon. It has been operational since 2004 in Denmark and is being used in Turkey. Japan and South Korea are also considering using this bus. This same bus company came to present this technology to the city council, but was prevented from doing so by the pro-rail council.

Governor Linda Lingle has given permission for a private company based in California to bring electric cars to Hawaii and be the first state in use this technology. It is her goal to make Hawaii 40% energy sufficient by 2030 and eventually an energy exporter, using Hawaii's natural resources of wind, ocean (wave energy and thermal energy), geothermal, and solar energies. We need the Governor to help provide traffic relief for H-1. Which is under the State's jurisdiction. The Governor believes that a non biased panel should assess whether rail is cost effective and the best solution available.

The skytran is experimental vehicle that merits consideration for use in Honolulu. It offers the potential of moving single passengers in small pods traveling via a sky grid using meglev technology for propulsion. This system is currently being tested in L.A. and has seems to have the potential

Michael Uechi

of moving people intracity and between cities. Like the meglev rail it has the ability to move people rapidly over long distances. This system uses commonly used materials found in all locales and easily assembled and cost effective. The grid system appears to be small and visually unobtrusive.

m. uechi

What is wrong with rail?

I envision delays especially eastward of Iwilei where Hawaiian burial sites or iwi. will alter rail's route and result in prolonged construction delays affecting businesses and traffic. The visual blight of rail in downtown Honolulu, especially the huge station on Bishop Street will be not only be an eye sore but a reminder of the asinine short sightedness of our city planners as the heavy rail screeches on during the day and late into the night.

Rail is old technology and hindered by extremely high capital costs and maintenance costs which will be the responsibility of our residents for generations. What will happen when the obsolete rail needs parts for repair? What happens to the white elephant if funds run out? What happens if there is poor ridership and we can no longer afford upkeep? What happens to rail and stations when they become perfect places for druggies, for graffiti artists, pan handlers, women of the night to conduct their business? Our city's maintenance of infrastructure is so poor, one has to wonder how the city will manage maintaining the rail.

The added expenditure of this costly project that will only increase traffic congestion to our already congested city streets and not provide traffic relief for our leeward and central Oahu commuters should be put to rest. Rail will not only be a detriment to our environment but be a detriment to our quality of life. By using the moneys for rail we will further neglect our (1) aging sewers that are leaking "brown waste" that contaminates our beaches during heavy rains, (2) secondary treatment plants that continue to dump improperly treated sewage into our ocean, (3) waste management, (4) landfill and (5) "pot hole" roads and freeways. Our parks and recreational facilities also reflect our city's neglect of taking care of city property.

We wonder how this city will be able to manage a complex rail system when it has proven to be woefully incompetent in managing its infrastructure.

MIKE UECHI

How was the public duped into choosing rail?

The current city administration from its inception choose not to use public deliberation to discuss rail alternatives. I have attended almost all of the community outreach meetings and can testify that there was no meaningful intercourse between the pro rail city appointed panelists and the opposition group. From the inception the City administration had chosen to ram rail down our throats with no consideration for any meaningful deliberation with the public. An advertisement extravaganza by the Mayor using taxpayers money, some 3 million plus dollars, to dupe the public into believing in the merits of rail allowed rail to narrowly defeat no rail in the general election. The mayor stated that the feds mandated that the city promote rail through advertisements.. An inquiry by Hawaii Reporter proved this to be untrue. The Mayor used taxpayers money under a false premise. The Mayor also stated that he would stop the actions of StopRailNow, a citizens group formed to allow the people to vote on whether to choose rail. The citizens right to use initiative as prescribed by the City Charter was being publically attacked by the Mayor. These are examples of the Mayor's heavy hand in promoting only rail and nothing else.

As a result of the dictatorial, non democratic ,unrestricted whims of the city administration and a non bid rail process that proceeded without any oversight we end up with a rail project that according to the rail propaganda will be solely financed by federal and state .5% excise tax. Nothing could be further from the truth as the price tag of rail has been increasing exponentially in price from 2.7 billion in 2004 to 5.3 billion in 2008 (Advertiser and Star Bulletin newspapers 12/2008).

To add to the insult rail was never intended to solve traffic congestion on our only major highway H-1. Congestion will worsen by 70% by 2030).

As a physician we use a phrase called curb side consultation to seek solutions to problems. I find that the most prudent way to reach a reasonable solution to any problem is to consult with others, better yet with others that have opinions different than mine to learn of new teachings and technology for my patients well being. We are trained to defend our position until someone else has a better solution. We then work with the better solution and bury the older obsolete method or system. We should bury rail, for there are many more better solutions.

M. UECHI

Summary

With the recent state's highway modernization project which will significantly reduce commute time, as well as be constructed much sooner and with significantly less cost to the public, the introduction of rail, which by comparison is definitely a very poor alternative.

Mike Uechi

December 10, 2008

Mr. Wayne Yoshioka
Department of Transportation Services
City & County of Honolulu
650 S. King St., 3rd Floor
Honolulu, HI 96813

Dear Mr. Yoshioka:

I would like to add my support to Councilman Djou's plan of building the initial phase of the rail system through the airport, and between the Aloha Tower and Aiea, and add that I would personally like to see the rail built between Aloha Tower and Pearl City.

I'm not a rocket scientist nor a mathematician, but it seems logical to me that relieving the congestion up ahead of traffic and closer into town will result in a trickle "westward" effect for those in West and Central Oahu. "Unclogging" the blockage or dam up ahead would result in:

- 1) helping to clear the blockage to the flow of the "automobile river" and thereby opening up a clearer and quicker path for those of us in the rear, for no matter how much of a relief in traffic there is at the rear (Kapolei and Waipahu), if there is congestion up front, it will make no difference in travel time for those of us at the rear (please excuse my redundant efforts to make a point).
 - a. like an escalator... as you're going up or down an escalator, and if somehow there's a pile-up or stoppage ahead of you, although you may be the only person at the clear end of the line, you'll be heading right into the pile-up ahead of you, and end up in a mess.

A rail route between Aloha Tower and Aiea (or Pearl City) through the airport would also:

- 1) allow more residents from, not only the Kapolei/Ewa area, but from other Oahu districts to access the rail as a means of transportation

- a. residents of West as well as Central Oahu and beyond would be provided an option of being able to drive to a point in Aiea (or Pearl City) and then ride the rail either to the airport or further into downtown for business, school and/or leisure.
 - b. make it more desirable and accessible for town residents and business people who are frequent commuters to the neighbor islands, and who may welcome the rail with open arms.
 - c. result in increased rail usage by residents from Pearl City to Halawa, and, combined with the number of possible rail user from Central Oahu, there could subsequently, be a decrease in the number of cars in traffic from Pearl City into downtown
- 2) make it more desirable for airport area employees and those needing to catch a flight in the morning to ride the rail, as these residents might find the rail more convenient than facing traffic and parking hassles and this, in turn, would alleviate the parking and traffic problems at the airport and potentially take additional cars off the road in the mornings

If one chooses to, or needs to, drive into town, with traffic being alleviated up front, commute time would decrease and gas mileage would increase.

I live in Mililani and have been selfishly wondering how a rail system from Kapolei to Waipahu would benefit my family and other residents in Central Oahu and beyond when traveling to and from town in the morning and afternoon rush hours. Simply put, this route will not be a benefit to any of us. We would still be facing the same traffic mess for years to come.

And, if the initial phase of the rail is built in Kapolei, I doubt very much if it will have an impact on the travel time of residents in that area of the island. Again, if there is a "bottleneck" up front, it doesn't matter if you relieve the traffic in the Kapolei/Ewa area -- the back end of the bottleneck. In order to get beyond Waipahu, rail riders from Kapolei/Ewa

would probably need to transfer in Waipahu to some form of vehicular transportation and will still add to, and have to deal with, any traffic bottlenecks between Pearl City and town.

Size of available land and immediate cost has been mentioned as the primary reason for overriding logic and efficiency. It is hoped that our elected servants are elected because the people believe in their creative and innovative intelligence and concern for the general well-being of the community as a whole, and realize that taking short cuts for the sake of immediate convenience will eventually cost us more in the long run.

A public official had the will to get this rail system developed on Oahu in spite of opposition, controversy, and concerns re cost, routes, etc. I believe his guiding words were, "If there's a will, there's a way." Why not follow his example and look for ways to improve our traffic and transportation challenges as logically and efficiently as possible.

Mahalo,

A handwritten signature in cursive script that reads "Elaine Chu".

Elaine Chu

cc: Councilman Charles Djou
Councilman Donovan DelaCruz

RECEIVED
FEB 6 12:32
DIRECTOR OFFICE
TRANSPORTATION SERVICES

Feb. 5, 2009

Jay McWilliams
1499 Alencastre St.
Honolulu, HI 96816
Phone: 808-551-2686

To: Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 S. King St. 3rd Floor
Honolulu, HI 96813

Regarding the DEIS for the Rail Project in Honolulu

Dear Mr. Yoshioka:

My comments regarding the DEIS for the rail project in Honolulu have to do with the financing of the \$5 billion cost.

In the beginning of this process, I heard representatives of the city, including you, state how we would finance the rail when it was being estimated at \$3.5 billion. That number, we in the public were assured, was covered with the General Excise Tax increase of 12.5 percent, the federal funding of \$900 million and \$1 billion in contingencies.

As you know, the economy has tanked, so our GE tax revenue is way down from estimated figures. We still have not been approved for the federal funding. And the cost of the project has gone up by \$1.5 billion from earlier estimates.

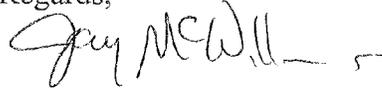
The mayor wants to start giving out contracts for this project and this is where I have a major concern.

Does the city have a plan to protect us from financial liability for this project in the event we can not raise the money necessary to build it? Call it a parachute plan or whatever, but are we going to be tied in to contracts for this project if the money we collect does not match the money we need for it?

Since the mayor has promised over and over again that he will not raise taxes any more in order to pay for rail, I would like to know what will be done to make the costs for rail match once again with the projected funding for it.

Thank you for your time concerning this matter.

Regards,

A handwritten signature in black ink that reads "Jay McWilliams" with a stylized flourish at the end.

Jay McWilliams

(copy) Governor Linda Lingle Hawaii State Capitol 415 S. Beretania St. 5th Floor Honolulu, HI 96813

(copy) Honolulu City Council Members via email

Honolulu High-Capacity Transit Corridor Project

Welcome to the Honolulu High-Capacity Transit Corridor Project's Public Hearing for the Draft Environmental Impact Statement/Section 4(f) Evaluation.

This public meeting and hearing has been designed to inform the public about the transit project, explain materials contained in the Draft EIS, answer questions from the public, and collect public input on project issues related to the Draft EIS, Section 106 of the National Historic Preservation Act, Section 4(f) of the U.S. Department of Transportation Act, and floodplains affected by the project.

Please review the project information and ask project staff any questions about the project that you might have. The Draft EIS is available on the project website at www.honolulutransit.org.

You may provide official comments in several ways. Here at this Public Hearing you may provide oral comments to a court reporter who will record them for the record or use this form to provide written comments. After the meeting, you may provide an on-line comment at www.honolulutransit.org or use this form to send a written comment to the Department of Transportation Services. All comments must be postmarked or received by January 7, 2009 in order for them to be included in the Final EIS.

Name: KATHERINE KUPUKAA Address: 95-685 MAKAUNULAU ST

Phone: 623-7070

MILILANI TOWN, HI

E-mail: _____

96789

Comment(s):

Kamehameha Hwy is 1 of only 2 corridors
from east to west. It is heavily used and
congested especially during peak traffic
hours, more so in the afternoons. There
is not enough lanes for the amount of
vehicles traveling. To eliminate lanes
would cause an unimaginable disaster.
The military facilities would be impacted
There is an overpass (H-1) Hawaiian Electric

and Sears Distributions. Is the train track going to be above the H-1. There are about 14 bus stops from Home Depot in Pearl City to the airport. I have caught bus #62 route. There are not hundreds of people waiting at the bus stops. Bidding is over inflated. The City is doing a great disservice to the citizens of the C + C of Honolulu by proceeding with this project. This project provides very little benefit if any and will not solve the congestion problem.

FOLD

Return Address

Place
Postage
Here

Department of Transportation Services
Attn: Honolulu High-Capacity Transit Corridor Project
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI, 96813

STAPLE HERE

Honolulu High-Capacity Transit Corridor Project

Welcome to the Honolulu High-Capacity Transit Corridor Project's Public Hearing for the Draft Environmental Impact Statement/Section 4(f) Evaluation.

This public meeting and hearing has been designed to inform the public about the transit project, explain materials contained in the Draft EIS, answer questions from the public, and collect public input on project issues related to the Draft EIS, Section 106 of the National Historic Preservation Act, Section 4(f) of the U.S. Department of Transportation Act, and floodplains affected by the project.

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Name: KATHERINE KUPIKAA Address: 95-685 MAKAUNULAU ST

Phone: 623-7070 MILILANI TOWN, HI

E-mail: _____ 96789

Comment(s):

Dillingham Blvd is 1 of 4 corridors
in the east/west direction to Honolulu.
It is heavily congested throughout the
day because there is not enough lanes.
To eliminate lanes for the train
track is unthinkable. The businesses
would also be impacted, not only with
loss of business but loss of property
space. There are about 12 bus stops

from Middle St to King and Dillingham
Blvd. There are not hundreds of people
waiting at these bus stops. People are
not going to give up driving their
cars and catching the train. This
project should be stopped immediately.
The State is coming up with projects
to reduce traffic congestion with more
lanes on H-1 and Nimitz Hwy.

----- FOLD -----

Return Address

Place
Postage
Here

Department of Transportation Services
Attn: Honolulu High-Capacity Transit Corridor Project
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI, 96813

DEPARTMENT OF
TRANSPORTATION SERVICES

09 FEB 6 P 2: 39

RECEIVED

STAPLE HERE

298703

Donald H. Burger
476 Paumakua Place
Kailua, HI 96734
barbdon@hawaiiantel.net
(808) 261 - 6391

DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION SERVICES

09 FEB 6 PM 2: 33

RECEIVED

February 5, 2009

Mr. Wayne Yoshioka, Director
Dep't. Of Transportation Services
City and County of Honolulu
650 S. King Street, 3rd Floor
Honolulu, HI 96813

Dear Mr. Yoshioka:

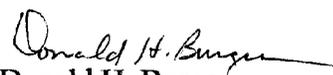
I am concerned about many impacts which will result from the proposed heavy rail system on Oahu and its construction, to be spread over many years. I spent 28 years in construction estimating and engineering, have reviewed the draft EIS, and do not believe the full force and effect of this proposed project has been adequately covered.

One question I have is with regard to commercial agricultural operations which will be subjected to moving and starting their operations over in a new location. Will it be possible to avoid losing a year more of income as local markets are without products or forced to import products at a much higher cost? Is an adequate amount included in the cost estimate to enable the displaced providers to do what they must to stay in business and provide adequate service during construction?

A greater concern is that of noise generated by passing trains, every few minutes during the day and far into the night. I believe the ability of students to concentrate on studies will be greatly diminished in schools near the tracks, and sleep will be disturbed in homes and condominiums, possibly resulting in Lawsuits on behalf of those affected.

Will passengers to and from the airport be able to transport luggage and other heavy items on the train? Has adequate cost of providing such amenities been considered?

Yours truly,


Donald H. Burger

cc: Mr. Ted Matley
cc: Gov. Linda Lingle
cc: Honolulu City Council

298709

Mr. Wayne Yoshioka, Director
Dept. of Transportation Services
City & County of Honolulu
650 S. King Street, 3rd Floor
Honolulu, HI 96813

DIRECTOR'S OFFICE
DEPT. OF TRANSPORTATION SERVICES

09 FEB 6 PM 12:33

RECEIVED

RE: Oahu's High Capacity Mass Transit Environmental Impact Statement (EIS)
NOT IN SUPPORT of a STEEL ON STEEL RAIL TRANSIT SYSTEM

Director Yoshioka:

My name is Daisy Murai, a resident of Kapahulu, which is next neighborhood to Waikiki, in the Primary Urban Center (PUC). My main mode of my transportation needs is serviced by the City's Public Bus System on a daily bases, unless I car pool, walk, take a taxi or trolley. I am fortunate that the buses in the Primary Urban Center come quite frequently within minutes of each other and very near to my home or destination(s), unlike other areas of the Island, where the bus stop is about 1/2 mile or farther away from homes and the service is 30 minutes to once an hour.

I enjoy and have had the experience of riding the Public Mass Transit Systems/Network in other Cities I have traveled, such as buses in New York City, St. John (New Brunswick), Japan and Las Vegas. I have also ridden the Staten Island Ferry in New York City (going to the Statue of Liberty), St. Charles Street Car in New Orleans and the Metro System in Washington D.C. The St. Charles Street Car (rail tracks are at street level) and Metro System of Washington D.C. (rail tracks are mostly underground -except for areas such as Arlington Station which is above ground), both of these systems use a steel on steel technology, which require huge areas of land for the tracks, transit trams and stations. I have found this system of steel wheels running on steel tracks also generates lots of noise, each time the trams starts up and stops on the steel tracks - and even making screeching noises when it stops.

The traffic congestion and gridlock facing Oahu drivers during the morning and afternoon Rush Hours from the West side to Downtown, is the reason for a High Capacity Mass Transportation System or some other Transportation Network System, which should alleviate traffic congestion and keep the traffic flow during these few hours of the day from Monday through Friday. The population base continues to grow on the West side of Oahu, as the City's Department of Planning and Permitting continue to issue Building Permits for future Residential and Commercial Development Projects, without increasing transportation infrastructural projects to meet population density increases.

The City's High Capacity Mass Transit or better known as "RAIL TRANSIT" Project is an elevated fixed guideway with a Steel on Steel Technology Transit System, of which the surface of the tracks will not be able to be utilized by any rubbernized vehicles, even emergency vehicles. The height of the fixed guideway with an elevation between 30 to 120 feet tall and support columns with a diameter of 6 feet wide and wider. It will be built in places with open lands of Kapolei as well as farm lands (Aloun Farms) and continue through the Primary Urban Center of Honolulu (building between existing buildings - including Historical areas), forcing the City to purchase private properties or even obtain the properties via eminent domain condemnation for the project, since Oahu is not as large as other places on the Mainland or the world.

The City's EIS does not address the complete Locally Preferred Alternative (LPA) route selected and approved by the City Councilmembers, which should also address the University of Hawaii at Manoa and Waikiki segments. The current route chosen to end at Ala Moana Center's Nordstrom's Department Store is actually Mayor Hannemann's Minimum Operational Segment (MOS) route, which is only a portion of the entire LPA approved by the City Council. I feel the entire LPA approved by the Councilmembers should be in the EIS. The route has just been changed and approved by the City Councilmembers on January 28, 2009 with a portion going to the Airport rather than through the Residential Community of Salt Lake.

The planning, design, land acquisition and constructing of Oahu's largest public works project will certainly require years to complete and will exhaust the Rail Transit funds collected by the State of Hawaii through a ½% General Excise tax to the year 2022. Even if the Federal Government somehow manages to release \$ 1 Billion dollars for this ambitious public works project on such a small land mass area and small population base (with comparable Cities) on the island of Oahu, the amount collected on the ½% general excise tax alone is not enough. In fact, Mayor Hanuemann's wish list from the State of Hawaii is the State's 10% administration fee for collecting the ½% G.E. tax for Oahu and money collected for Traffic Violations by the City. (Refer to the articles in our 2 daily Newspapers dated January 14, 2009).

There are portions of the Rail Line (Nimitz Highway) which is several feet away from the ocean. Halekauwila, Queen and Kona Streets are also close to the Ocean. The project developers, when digging the properties for the Rail Transit will at times stumble upon human bones, which is a common occurrence in Hawaii. There were several projects, such as the Super Center Wal-Mart/Sam's Club on Keeaumoku Street, H-3 Tunnel/Freeway and Whole Foods Structure at Ward Centre are just a few examples, where workers have uncovered human bones from old and unmarked burial sites. In the 1800's, the people of Hawaii would bury their loved ones close to the ocean or in the mountains in unmarked gravesites.

This project will require roughly 9 years for the first phase as mentioned at the City's Dept. of Transportation Services, presentation of October 29, 2009 at the State Capitol. By that time most of the current Baby Boomers will have retired, such as myself. If I were to utilize this Rail Transit System to get to Aloha Tower Station from my home in Kapahulu for example, I would need to catch a circulator bus from my home to Ala Moana Center, get off at Ala Moana Boulevard, walk across the Center to Nordstrom Department Store (10 minute walk), go up 30-80 feet (another 5 minutes) to ride the tram, get off at the Aloha Tower Station Transit Station, go down to street level and walk across to Aloha Tower Marketplace. If I caught the circulator bus, I would get off at the Aloha Tower Stop on Ala Moana Boulevard, (which is 5 - 7 minutes away from Ala Moana Center) and walk 2 - 3 blocks, which is a more direct route and get there much faster than the Rail Transit System.

The Rail Transit trams will be in operation 3-10 minutes apart and from 4 in the early morning to 12 midnight every single day. The 3 - 6 minute intervals between trams will make it extremely difficult for passengers with walking difficulties and wheelchair bound to board the ADA compliant trams during "RUSH HOURS" - even if the platform and boarding passageway are of the same level. The reason is due to the relatively short time of 3 - 6 minutes to board, settle and be secured in their seats. Not all handicapped & wheelchair bound passengers will be able to settle safely into their seats within 3 - 6 minutes. I have observed some of these passengers who use the current buses, require much more than 3 minutes to maneuver their wheelchair and be properly secured, once they have boarded the buses. Some of them require several minutes of back & forth movement of their wheelchair to be in the correct position for the drivers to secure their wheelchair. I also understand that bicyclists will not be able to board the trams with their bicycles during "RUSH HOURS", since they will slow down other passengers from boarding the trams, as mentioned by Outreach Coordinator Pat Lee. I did not witness any wheelchair bounded passengers ride the METRO System in Washington D.C. It could be due to the limited time required to board the trams since the trams run on a tight schedule, even if these passengers were able to get below street level to the platforms.

I have 2 friends who live on the Westside of Oahu and drive to work. They both are deadly afraid of heights to the point where they will, close their eyes, break out in a cold sweat and inch their way slowly while they hug the building walls without looking downward whenever they know they are several feet above the ground. These 2 will continue to drive to work, further adding to the traffic congestion. There are other drivers who are also deadly afraid of heights and probably continue to drive during "RUSH HOUR" than ride the Rail Transit.

The State's Director of Transportation (DOT) nor Governor Lingle at this time, have NOT approved the City using the State's Highways, Freeways and surface streets (H1, H2, Farrington Highway, Kamehameha Highway, Nimitz Highway, parts of Ala Moana Boulevard and other State owned roadways) for the City's Fixed Guideway Rail Transit project. These are crucial Right-of-Way roadways needed for the City's RAIL Project to reach Downtown and beyond. State's DOT Director Brennan Morioka and Governor Lingle announced 2 State High-way projects to

help relieve traffic congestion for motorists traveling to and from West Oahu. The Federal Government and the Governor have both released funds to start these 2 projects. Project No. 1 will replace the current morning zipper lane on the H1 Freeway with 2 contra-flow (East bound in the morning and Westbound in the afternoon between Keehi & Waiawa Interchanges) lanes during Rush Hours. The 2nd project is to widen the Middle Street merge going eastbound to relieve bottleneaking from Ola Lane to Vineyard Boulevard. Please refer to the State of Hawaii's web site (www.hawaii.gov) dated January 23, 2009 under Governor Lingle's press releases.

These are the reasons, why I feel other Transportation Alternatives needs to be re-visited for a better solution, than to totally rely on the "Steel on Steel RAIL TRANSIT" as the only source for traffic congestion relief. I would suggest:

- 1) Build an elevated EXPRESS Way for High Occupancy Vehicles (3 or more per vehicle) without charge, and charge other motorists with less than 3 in the vehicle. An electronic eye could monitor if payment is due. The payments collected would help pay for the operation and maintenance of this project.
- 2) The City's Dept. of Transportation Services mentions additional buses on the roadway will further compound traffic, causing gridlock on the roadways. The solution could be, keep the bus fleet at 525 buses, but change some of the routes to go into areas with new Residential Developments (not just keep it on the Main roadways), change 1 bus on the current route to an Express Bus, and change more routes to connect to other communities on Oahu. The Express Buses are well used by bus passengers, once they understand the route it travels. I usually take the Express Buses A, B, C and E unless I need to get off at a bus stop the Express Bus does not stop at. The Express buses on the whole are well utilized by the number of passengers I see riding them daily during Rush Hour. These buses are not as crowded at other times, but very convenient and a fast way to get to your destinations.
- 3) The power source to fuel the steel tracks & trams for the Rail Transit is electricity, generated by Hawaiian Electric Company (HECO) on the island of Oahu. Recently, HECO's system has been tested with an Island-wide (Island of Oahu) Black-Out situation – the October 6, 2006 earthquake and the December 26, 2008 lightning storm incidents (please refer to our 2 daily newspapers regarding information to the Island-wide black-outs at www.honoluluadvertiser.com or www.honolulustarbulletin.com for articles dated the following day of each instance). In both cases, the generators at the relay stations turned off automatically to prevent major damage to the system. In both instances, it took HECO several hours – even lasting into the following day to be back to full capacity. Even though HECO is looking into alternative energy sources for the future and is to be the sole provider of electricity, based upon it's performance of restoring power to the 2 island-wide power black-out incidents, it will be several hours or days before the Rail Transit will be back in full operation. HECO needs to restore power to it's customers – especially the Health-Care providers, Schools, Safety and other Emergency facilities, before restoring full power to the other customers and the Rail Transit System.

Upon completion of the project, the residents traveling during "RUSH HOUR" to Downtown and back to the West side will be the current younger generation of which many continue to travel via their own private vehicle rather than use the City's Mass Transportation System, further compounding traffic gridlock. I feel it would make more sense to build an elevated roadway for smoother traffic flow, charge for vehicles carrying less than 3 using the Express Roadway, and improve the current Bus routes would be a better system. This would not be as costly as the "Elevated Fixed RAIL TRANSIT". The businesses in the near future may even have their employees work from home to reduce traffic congestion. My cousin & his wife, who live in California, both are salespersons of major Corporations and both work from home, but will commute to their work place only when needed –which means 2 few cars on the roadway.

Thank you for the Opportunity to Speak. **I DO NOT SUPPORT a \$ 5 – 6 plus Billion Elevated Fixed Guideway with a RAIL STEEL ON STEEL Transit project for the Island of Oahu. I would appreciate the City and County of Honolulu to revisit other alternatives in the EIS, especially since the State of Hawaii auditor's report clearly shows grave over-sight on problems with of our Superferry, (a State of Hawaii project) which is showing up now – several months after the Superferry started operating between the islands of Oahu and Maui. The State did not do an EIS prior to the start of this interisland transportation system, which is clearly showing that impact problems should have been addressed in the EIS.** (Please refer to Honolulu Advertiser and Honolulu Star Bulletin articles dated from December 18, 2008). I was told by a testifier at the Public Meeting, that the City will allow only 1 testimony per person at any public hearing -even if there might be new information presented after the testimony, which I feel that the City is clearly inhibiting the general public's input – especially when the Impact of this project is so enormous and Most people on Oahu will be affected.

Daisy Murai
3039 Kaunaoa Street
Honolulu, HI 96815
Dated: February 1, 2009

cc: Mr. Ted Matley
Federal Transit Authority, Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

cc: Governor Linda Lingle
Hawaii State Capitol
415 S. Beretania Street, 5th Floor
Honolulu, HI 96813

cc: Councilmember Duke Bainum, District 5
City & County of Honolulu
530 S. King Street, 2nd Floor
Honolulu, HI 96813

29869/

Jacqueline A. Parnell
129A Ulupa St
Kailua, Hawaii 96734

February 5, 2009

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

RE: Draft Environmental Impact Statement for the Honolulu High Capacity
Transit Corridor Project

Before I comment of the substance of the DEIS, I would like to draw attention to its production and distribution. It is not sufficient to make it available on DVD disk only. Many people are not computer literate and even we who are, prefer to have a hard copy when we are reading seriously. Also, the maps can only be printed out with a commercial-sized computer which can use 11 x 17 paper.

It would be far better to make a less beautiful and cheaper version which can be distributed widely. I should not have to pay \$59 to get a real copy of the document or be limited to reading it at the library.

Please make any supplements and the Final EIS available to everyone.

I do not think the DEIS fully showed how large and ugly the elevated transit stations will be. They will not fit in with the character of our islands at all. We are already in trouble attracting tourists. This big ugly project will surely ensure that nobody will want to visit our "tropical paradise" again! People have voted for rail but I believe they were sold on it through false advertising. What they are picturing in their minds is nothing like what you have presented in the DEIS even though that is understated.

Even domestically it is inappropriate. In order to provide adequate ridership, we will have to have high-density developments around the stations. But that is not what the residents of Oahu want! There will be strong objections to the necessary rezoning. It does not seem fair to use the transit to create planning and zoning changes which would otherwise be rejected by the citizenry. This is "we know what's good for you whether you like it or not" planning. As a retired planning professional, I strongly object.

Sincerely yours


Jacqueline Parnell, FAICP

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09 FEB 6 P12:32
DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION SERVICES

February 2, 2009

098713

Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

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RECEIVED
DIRECTOR'S OFFICE
SECTION OF SERVICES
TRANSPORTATION SERVICES

RE: Draft Environmental Impact Statement [DEIS]

Dear Sir or Madam:

As CPA's, we support viable and affordable traffic solutions for the City and County of Honolulu. We find several flaws regarding funding for the proposed rail project currently estimated to cost \$5.5 billion for the airport route adopted on January 28, 2009 and summarized in Section 6 of the Draft Environmental Impact Statement [DEIS]. We believe these flaws are of such magnitudes that not only will this project be neither viable nor affordable; this project will jeopardize our City and County's financial health and sustainability.

How realistic are the funding assumptions?

The basis for funding the proposed rail system is a 1/2% excise surcharge assessed on county transactions from January 1, 2007 to December 31, 2021. Using the City's figures provided in Section 6 of the DEIS, this surcharge needs to generate a minimum of \$4.1 billion. The cash flow statement of the DEIS includes surcharge tax collections through 2023, two years past the 2021 collection expiration date provided by law. When the taxes for the additional two years are deleted from the City's projection, the required collections are short by \$473.5 million [Exhibit A].

The collections from January 2007 to December 2008, total \$294 million, substantially below the City's projections. It would require a minimum tax growth rate of 9.46% every year for thirteen [13] years [Exhibit B]. Based on the Honolulu's economic history and the current global economy, this growth rate is unattainable.

What do the economists say?

The Council on Revenues [the economic board that provide forecasts of tax revenues to the Governor and State Legislators] issued new tax collection forecasts on January 12, 2009 [Exhibit C.] The forecast for growth in Hawaii tax revenues for 2009 through 2015 are -3.1%, 1%, 3.5%, 5.3%, 6%, 6.5%, and 6.5%. Using these forecasts, it would require an increase, compounded annually; in collections of 25.29% from 2016 to 2021 [Exhibit D]. These forecasts do not include the additional cost for borrowing funds due to the shortfall in surcharge tax collections. This rate of required growth in tax collections is unattainable based on our economic history.

The funding should be based on the economic realities and reasonable factors:

1. 2007 and 2008: The actual surcharge collections
2. 2009 through 2015: The Council on Revenues forecasts
3. 2016 through 2021: Using a 6.5% growth rate of collections

Based on the above assumptions, the City will experience a **\$1.26 billion shortfall** by the year 2021 [Exhibit E].

How much will the federal government contribute?

The DEIS estimates this rail project will cost approximately \$5.5 billion, with \$ 1.4 billion to be provided by the U.S. Department of Transportation. The federal funds are to be paid through their "New Starts" grants in the amount \$200 million per year for seven [7] consecutive years. The 2009 budget for "new starts" is \$1.475 billion for 30 grants that were selected from mass transit program applications from municipalities nationwide. The average grant is \$47 million with two-thirds [2/3] of the grants going to cities with populations averaging 5.4 times the size of Honolulu. The average grant for smaller cities such as Honolulu is \$23.5 million. There is great competition for these grants. The DEIS assumption that Honolulu will successfully obtain 1/7 of the country's mass transit budget for seven consecutive years is unrealistic and not viable.

What are the risks?

- Honolulu could have a rail system that is never completed. With no monies available to complete the project, the useless concrete pillars will be a monument to an irresponsible act that will mar our landscape for years to come.
- Honolulu's credit rating could plummet resulting in higher unbudgeted costs for interest on borrowed funds.
- Residents could face tax increases to pay for the shortage that will put undue economic pressure on them and future generations.
- Honolulu could be bankrupt due to all the debt that even future generations cannot service.

The City and County of Honolulu has a duty to its residents and taxpayers to act appropriately and prudently when committing our resources to traffic solutions. **The solutions must be viable and affordable.** We await your response to our concerns.

Very truly yours,

Janet I. Jensen, CPA
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Honolulu, Hawaii 96813
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Facsimile: 808.791.1440
Email: Joe@wikoffcombscpa.com

Honolulu Rail
 Draft Environmental Impact Statement
 Cash Flow for Surcharge collections on Airport alternative
 (prepared on a fiscal June 30 year end)

Fiscal Year	Projected Collections
2007	13,000,000
2008	161,000,000
2009	188,000,000
2010	198,000,000
2011	207,000,000
2012	214,000,000
2013	228,000,000
2014	242,000,000
2015	253,000,000
2016	265,000,000
2017	274,000,000
2018	285,000,000
2019	300,000,000
2020	309,000,000
2021	321,000,000
12/31/21	168,500,000

Point at ending of collections:	3,626,500,000
Shortage	473,500,000

	4,100,000,000
=====	
Collections after termination of excise	
2022	168,500,000
2023	261,000,000

EXHIBIT A

Honolulu Rail
Excise surcharge with actual collections 2007 & 2008
and required assumptions to fund \$4.1 million

Annual Required increased Collection Rate	9.45582%			
	=====			
Calendar Year	Required % Growth	Required Annual Tax Collections	Cumulative Tax Collections	Required Ave Monthly Collections
2007/2008 Actual		294,000,000	294,000,000	12,250,000
2009	9.46%	160,900,055	454,900,055	13,408,338
2010	9.46%	176,114,475	631,014,530	14,676,206
2011	9.46%	192,767,543	823,782,073	16,063,962
2012	9.46%	210,995,295	1,034,777,368	17,582,941
2013	9.46%	230,946,630	1,265,723,998	19,245,552
2014	9.46%	252,784,528	1,518,508,525	21,065,377
2015	9.46%	276,687,377	1,795,195,903	23,057,281
2016	9.46%	302,850,438	2,098,046,340	25,237,536
2017	9.46%	331,487,430	2,429,533,771	27,623,953
2018	9.46%	362,832,285	2,792,366,055	30,236,024
2019	9.46%	397,141,053	3,189,507,108	33,095,088
2020	9.46%	434,693,996	3,624,201,103	36,224,500
2021	9.46%	475,797,877	4,099,998,981	39,649,823

EXHIBIT B

LINDA LINGLE
GOVERNOR
JAMES R. AIONA, JR.
LT. GOVERNOR



PAUL H. BREWBAKER
CHAIR
JACK P. SUYDERHOUD
VICE-CHAIR

MEMBERS:
Carl S. Bonham
Dean K. Hirata
Pearl Imada Iboshi
Richard F. Kahle, Jr.
Albert Yamada

COUNCIL ON REVENUES

STATE OF HAWAII
P.O. BOX 258
HONOLULU, HAWAII 96809-0258

January 12, 2009

The Honorable Linda Lingle
Governor, State of Hawaii
Executive Chambers
State Capitol, Fifth Floor
Honolulu, HI 96813

Dear Governor Lingle:

At its meeting on January 9, 2009, the Council on Revenues adjusted downward the forecast growth rates of General Fund tax revenues. The forecast was reduced from -0.5% to -3.0% for fiscal year (FY) 2009, from 3.5% to 1.0% for FY 2010, and from 4.5% to 3.5% for FY 2011. The Council also updated its forecasts of General Fund tax revenues for FYs 2012 through 2015, generally lowering the revenue gains while leaving the percentage increases the same for the out-year projections.

The revised forecasts of state general fund tax revenues for fiscal years 2009 through 2015 are listed below:

Fiscal Year	Thousands of Dollars	% Growth From Previous Year
2009	\$4,502,616	-3.0%
2010	\$4,547,642	1.0%
2011	\$4,706,809	3.5%
2012	\$4,956,270	5.3%
2013	\$5,253,646	6.0%
2014	\$5,595,133	6.5%
2015	\$5,958,817	6.5%

Line-item detail of State General Fund tax revenues by revenue category for FY 2009 through FY 2015 are presented in the attached table. These detailed forecasts are based on the Council's forecast for total state general fund tax revenues and the econometric model currently used by the Tax Research and Planning Office.

EXHIBIT C

Honolulu Rail
Excise surcharge with actual collections 2007 & 2008,
Council on Revenues tax collection projection 2009–2015
and required assumptions to fund \$4.1 million by 2021

Annual Required increased Collection Rate		25.28750%	=====	
	% Growth by Council On revenues	Required Annual Tax Collections	Cumulative Tax Collections	Required Ave Monthly Collections
2007/2008 Actual		294,000,000	294,000,000	12,250,000
2009	-3.00%	142,590,000	436,590,000	11,882,500
2010	1.00%	144,015,900	580,605,900	12,001,325
2011	3.50%	149,056,457	729,662,357	12,421,371
2012	5.30%	156,956,449	886,618,805	13,079,704
2013	6.00%	166,373,836	1,052,992,641	13,864,486
2014	6.50%	177,188,135	1,230,180,776	14,765,678
2015	6.50%	188,705,364	1,418,886,139	15,725,447
2016	25.29%	236,424,233	1,655,310,372	19,702,019
2017	25.29%	296,210,010	1,951,520,382	24,684,168
2018	25.29%	371,114,117	2,322,634,499	30,926,176
2019	25.29%	464,959,599	2,787,594,098	38,746,633
2020	25.29%	582,536,258	3,370,130,356	48,544,688
2021	25.29%	729,845,114	4,099,975,469	60,820,426

EXHIBIT D

Honolulu Rail
Excise surcharge with actual collections 2007 & 2008,
Council on Revenues tax collection projection 2009–2015
Funding the shortfall with 5.5% Bonds
6.5% growth rate 2016 to 2021

	% Growth by Council On revenues:	Required Annual Tax Collections	Cumulative Tax Collections
2007/2008 Actual		294,000,000	294,000,000
2009	-3.00%	142,590,000	436,590,000
2010	1.00%	144,015,900	580,605,900
2011	3.50%	149,056,457	729,662,357
2012	5.30%	156,956,449	886,618,805
2013	6.00%	166,373,836	1,052,992,641
2014	6.50%	177,188,135	1,230,180,776
2015	6.50%	188,705,364	1,418,886,139
2016	6.50%	200,971,212	1,619,857,352
2017	6.50%	214,034,341	1,833,891,693
2018	6.50%	227,946,573	2,061,838,266
2019	6.50%	242,763,101	2,304,601,367
2020	6.50%	258,542,702	2,563,144,069
2021	6.50%	275,347,978	2,838,492,047
		Shortfall	1,261,507,953
		Required	4,100,000,000

EXHIBIT E

February 4, 2009

298905

TO Director Yoshioka, Ted Matley, Governor Lingle, and Members of the City Council

RE Opposition to Honolulu Rail Project Due to Challenges Unresolved by EIS

This communication is submitted in response to the EIS and offers commentary on the adverse effects the proposed rail system will have on Oahu and particularly downtown Honolulu and the City's shoreline.

There are so many factors that deserve comment, factors that justify returning to the drawing board and advancing a traffic plan that can succeed rather than one that is doomed to fail. I have gone to countless public meetings and hearings on this project. I have studied the impacts of rail and the relative advantages/disadvantages to cost of these various cities. I am not impressed that we can justify the extensive negatives and high costs by any benefits that might result for a small portion of the population who would ride the train. I am a social science researcher with a Ph.D. and am a faculty member and the leader of planning in a local university. My investigation into this problem, the proposed solution, and the inadequacy of the draft EIS make me conclude that this is still a project that should not be carried forward. We should, at the very least, get more answers than we have now -- before any further steps are taken. I will cite 3 concerns as major problem areas not resolved by the EIS.

1. Deception, Misinformation and Misuse of Taxpayer Funds Create Adverse Economic and Social Consequences – One set of severe adverse consequence of this doomed project is the loss of public trust in government, the questionable investment in the front-loading of publicity for the project, and the long term economic losses we will experience when the project goes into overruns of time and resources. A large portion of the public has lost faith in the ability of the government to engage in an objective analysis of a problem and solution. We have seen way too much money spent on the initial consultation. We have seen our tax money spent on biased and nasty advertising and public relations. And we have seen a commitment carried forward even now in a time of recession, as if there was no economic crisis in our land and we should still seek *the most expensive transit system for the shortest distance and the smallest number of people.*

The EIS has not properly addressed the social and economic impacts of the proposal and project to date, nor does it explain why this huge report came out only 4 days before the election and the vote that supposedly showed "support" for the project. People have been frightened into thinking there are no choices and they had *inadequate time to consult the draft EIS to form their own opinions.*

2. Creation of a True "Blight" on the Oahu Landscape and Shoreline Viewplanes Without an Equivalently Powerful Public Benefit – There has been little consideration given to the disastrous effect of this proposed project on the viewplanes of Oahu and the especially adverse effects on the Downtown to Ala Moana areas and the shoreline views. The EIS does not properly address this in the sense of defining advantages that would outweigh the drastic disadvantages. Add to that the lack of answers to many questions about details of the project. For example, how do we assess the impact at Ala Moana Center if we don't have elevations and instead of hearsay and stories. We are told that even if it is ten stories the 100 feet will be at the top not the bottom, so not to worry. I was told this by a city official at a public hearing.

RECEIVED
09 FEB 6 PM
DIRECTOR OF
DEPT. OF
TRANSPORTATION

Letter re Honolulu Transit EIS – From Nancy Hedlund, Honolulu

This is merely an example. There are countless unanswered questions about claims for benefits, costs, impacts on existing transportation (The Bus) and so on. The EIS has not resolved questions about false claims, such as presenting statistics claiming benefit but still falling far short of the problem. There is inadequate exploration of the arguments that have emphasized advantages and positives without explaining the larger negatives within which only relative small benefits may be created --- at massive costs to a State now in very serious decline economically. *No one would urge an average person whose income was reduced by the recession to go ahead anyway and buy an expensive yacht because it might offer an alternative way to travel from Ewa to Pier 1!*

3. Unresolved Questions about the Proposed Technology – Given the inadequacy, deceptive communications, and unanswered questions about the choice of fixed rail, it is hard to believe that the rail advocates are continuing to press forward. Many alternatives were essentially dismissed, even though they were listed to give the (false) appearance that they were given serious consideration. The EIS does not resolve the many questions that many citizens still raise about the need for elevated rail, for steel on steel, and equipment not made in the US. Add to that the problems with construction here in Hawai'i and lack of people experienced in the methods to be used. In the meantime, ground-level alternatives that would have the advantage of being "on the ground" have not been given sufficient attention and consideration.

In summary, the EIS fails to answer many important questions, fails to sufficiently well address the adverse social and economic impacts on Hawai'i and fails to provide a basis for resolving the enormously adverse effects on the "look" of Hawai'i and the view planes of so many who live here every day and will have to look at those dreadful elevated tracks and cars moving right through a person's attempt to look out at the horizon as they did in years past. No more horizon. No more skyline.

This is a deeply disappointing and disturbing move by a few people who have been exposed as intending to benefit certain businesses and developers. Shame shame on the government officials who have advanced a plan that so clearly means disadvantages that vastly outweigh very small supposed gains.

Respectfully Submitted,

Nancy Hedlund, Ph.D.
Honolulu, Hawai'i

Member, Ala Moana/Kaka'ako Neighborhood Board (#11)

Member, HCDA's Kaka'ako Makai Community Planning Advisory Council

*Nancy Hedlund
930 Kahaione St #3601, Honolulu HI 96814*

TO: Wayne Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 S. King St. 3rd Floor
Honolulu, HI 96813

(copy) Ted Matley FTA Region IX 201 Mission St. Suite 1650 San Francisco, CA 94105

(copy) Governor Linda Lingle Hawaii State Capitol 415 S. Beretania St. 5th Floor Honolulu, HI 96813

(copy) Honolulu City Council Members

298702

Gregory Foret
P.O. Box 490
Waialua, HI 96791
Tel: 808 637-8887

brgregory@hawaii-benedictines.org

TRANSIT PROJECTS
OFFICE
SERVICES

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FEB 12 3 32

February 4, 2009

Mr. Wayne Yoshioka
Director Dept. of Trans. Services
City & County of Honolulu
650 S King Street
Honolulu, HI 96813

Dear Mr. Yoshioka,

Thank you and the project team for sending me a copy of the Draft Environmental Impact Statement for the High Capacity Transit Corridor Project and inviting me to submit comments about it. As one who has had some studies in landscape architecture and urban planning while in college just over 30 years ago, and having an ongoing interest in public transportation planning it is appreciated. I was not able to read the entire document thoroughly and will not be able to comment as much as I wish so I will try to be brief on the topics I want to comment and suggest the most.

I commend the planners and those who prepared the document for a very thorough comprehensive and well balanced study. Well done.

Page 4-93: Mitigation: I hope an architect would be involved to help blend the station design at China Town and Downtown. Also to soften the effects where straddle beam construction such as shown on 4-84.

Page 4-101: Noise Impact Mitigation: I did not find any indication of how fast the trains would be operating in the areas identified as having moderate noise impact. From the maps I figure that as many of those areas are in a highly urban area, in close proximity to a station, the trains will normally be operating slower than in the more open western portions of the route. I anticipate that in the Kakaako area (curves) and Pearl Highland area (Station and curve) the trains may be averaging only 30 mph or less. If noise is still a problem at those speeds, may have to consider higher noise reducing baffles along to side of the guideway that faces the high rises in close proximity.

Maintenance/Storage area: My preference is for the spot between Waipahu and Leeward Comm. College. It is a more central location for more efficient staging of trains. The Hoopili site has extra non-revenue trackage required to access it and two crossings of Farrington Hwy. The eastern crossing looks awkward visually because of the acute angle of crossing.

Plans and Profiles in Appendix A: I understand there is a master plan already for the development of Hoopili and the East Kapolei area. It would be very helpful to show what the adjacent street patterns alongside and under the guideway would be like. Otherwise having an elevated guideway in an open undeveloped area would not make sense. The ROW could be fenced off and any roads needing to cross would go over the track by overpass.

Construction Phasing: Page 2-39, 2-40: For an opening segment, it is best to have a segment long enough and serving enough residences and businesses to encourage use and appear useful. This encourages continued public support. I would consider a West loch to Aloha Stadium to be a superior opening segment than the Kapolei to Pearl Highlands segment, even though the opening date may be later. Having the maintenance area by Leeward Comm. College, and crossovers already planned near the West Loch and

Aloha Stadium stations would allow this. While creating a spur and incentive for developing of East Kapolei is a goal of the project, I see moving people between three communities, (Aiea, Pearl City, Waipahu) with a stadium and and shopping center to be a bigger priority. I do not see what the big hurry is for about doing East Kapolei first. It can wait. The projected transit oriented development will be slow to take place until the route gets past Pearl City or reaches West Kapolei.

Finally, even though The city council has already chosen the Airport Alternative and I was not able to attend the earlier public presentations of the alternatives, I wanted to be on record as preferring the Salt Lake Alternative. It is based on the lower overall cost and the presence of the high density residential area there. Such a route will greatly improve public transportation service between Salt Lake and Aiea and points west which currently is slow and indirect. I am somewhat skeptical of the extent military areas creating transit demand as employment centers when Hickam will not be directly served and most of the Pearl Harbor employment areas are a long walk or require a connecting shuttle. I thought the Salt Lake Alternative suffered from having only one station of its own along its stretch. I wonder, if a station is being planned for the Lagoon Dr area, why could there not be a station close to Puuloa Rd serving that industrial area plus a neighborhood close by. I would also have moved the Aloha Stadium station closer to Halawa Stream on the south edge of the parking area to strike a balance of serving the residential area along Halawa Stream and the Stadium Marketplace businesses as well as the stadium. The wading distance from the park and ride lot would not be much longer than next to the stadium, and connecting busses have a better route to Ahuimanu and Halawa neighborhoods. These would have increased ridership.

While living and working in Waialua means that I will be using the trains only seldom, I am looking forward to the project's implementation.

Sincerely yours,



Gregory Foret

298692

Mr. Wayne Yoshioka
Director Department of Transportation Services
City and County of Honolulu
650 South King St. 3rd Floor
Honolulu
HI 96813

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

CC Governor Linda Lingle
Hawaii State Capitol
415 S Beretania St. 5th Floor
Honolulu, HI 96813
CC City Council Members

Dear Sir or Madam:

Feb 5, 2009

I have read the Executive Summary of the DEIS on the proposed \$4.7 billion rail project and I have a few questions. As someone who will never live long enough to see it built, would not ride it anyway, and knows no one who will; I am most concerned about its cost and its effect upon our economy. The advocates of the rail project used my tax dollars to buy votes with one-sided ads that claimed this project would create jobs and help the economy. My questions are:

1. If cost estimates are exceeded (as everyone on Earth expects) or if ridership revenues are less than expected (another certainty), where will the government (city or state) get the money?
2. If you are going to tax the non-riders so that the riders can pay less and be subsidized, will you tax other non-users (i.e. the entire state) as well or will you just tax those that can't escape?
3. If it becomes obvious that rail will not create jobs, pay for itself, be affordable, or solve our traffic problems, can this project be terminated and the existing columns and pillars be converted to tombstones for the politicians responsible for this mess?

Sincerely,

William H. Follmer
William H. Follmer
99-1647 Aiea Heights Drive
Aiea HI 96701

DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION SERVICES

09 FEB 6 PM 12:32

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General Services Administration, Region 9
Public Buildings Service
Hawaii Field Office, San Diego Service Center - 9PDH
300 Ala Moana Blvd, Suite 1-336
Honolulu, HI 96850-0001
Phone (808) 541-1950
Fax (808) 541-3601

February 6, 2009

Wayne Yoshioka, Acting Director
Department of Transportation
City and County of Honolulu
650 S. King Street, 3rd Floor
Honolulu, Hawaii 96813

RECEIVED
FEDERAL TRANSIT
DIVISION
FEB 6 3 48 PM '09

Dear Mr. Yoshioka:

The purpose of this letter is to bring to your attention the following issues for the Draft Environmental Impact Statement for the Honolulu High-Capacity Transit Corridor Project (the Project) proposed by the Department of Transportation, City and County of Honolulu (DOT). The United States General Services Administration is the owner and property manager of the Prince Jonah Kuhio Kalaniana'ole Federal Building and Courthouse located at 300 Ala Moana Boulevard ("PJKK Building"). The PJKK Building houses approximately 2,000 federal employees from tenants such as the United States District Courts, Marshals Service, Federal Bureau of Investigation, Secret Service, Drug Enforcement Agency, Coast Guard, Department of Homeland Security, Internal Revenue Service, and Social Security Administration. Further, the PJKK has approximately 500 to 700 public visitors per day.

We understand that DOT is proposing an elevated light rail transportation system which will travel on Halekauwila Street, including a portion of the site of the PJKK Federal Building. On December 15, we wrote to DOT to advise them that GSA, an affected property owner, had not received an invitation to participate in the scoping process. Nor have we received any of the multiple notices of intent issued for this project and the draft Environmental Impact Statement. (A copy of our December 15 letter is attached).

DOT's January 22 response was silent on the absence of required notice. DOT only expressed that GSA should have commented during the alternatives screening held in 2006 without explaining how GSA could have participated since we were never notified of the alternatives screening. The result of this screening process was that DOT decided to place the route on Halekauwila Street requiring the loss of a portion of the site. DOT stated that any changes to the route at this stage would need city council approval thereby implying that opportunity for meaningful comment has been foreclosed which is in direct contravention of the National Environmental Policy Act (NEPA).

DOT's excuse for failure to notify GSA was that there was opportunity to comment on proposed routes prior to the issuance of the Draft EIS. However, the fact that there was a screening process prior to the issuance of the Draft EIS does not relieve the DOT of its legal obligation to notify interested parties of the EIS process.

Further, as stated above, GSA was never notified of the screening process. Also, the fact that the alternatives screenings process was a public process does not meet the notice requirements of NEPA.

The fact that the proposed project is public knowledge provides only information from the government to the citizens and does not allow information to flow from the citizens to the government. *Natural Resources Defense Council v. Morton*, 388 F.Supp. 829 (D.D.C. 1974).

Since GSA is a property owner whose property is proposed for acquisition, GSA is an "interested party" under NEPA. See *Colony Federal Savings and Loan Association*, 482 F.Supp. 296 (W.D. PA 1980). DOT is legally required to notify interested parties of the proposed project. By failing to do so, DOT has precluded GSA from raising environmental issues prior to its selection of Halekauwila as part of the preferred alternative.

We believe that there are important issues critical to DOT's ability to make an informed decision about the Halekauwila Street portion of the route. GSA would have been able to provide DOT information about the possible significant adverse impact of the proposed project. We are very concerned that the presence of an elevated rail transit system in close proximity to the PJKK will create security problems.

In our February 3, 2009 meeting with Faith Miyamoto, Chief of Transportation Planning, and City consultants we discussed some of these security concerns. After the bombing of the federal building in Oklahoma, all federal buildings were classified according to necessary security level. Minimum security standards were established for each security level. Due to high volume public contact and the presence of the US District courts and other agencies, the PJKK Federal Building has been classified at a security level necessitating stringent security requirements. As a result, the PJKK building must be setback to the maximum extent possible from any potential point of explosion. Introduction of the light rail along the Halekauwila Street and/or reducing our current setback will adversely impact the security of the occupants of the PJKK Federal Building and may limit the agencies that can occupy this building.

During this meeting, we also shared other possible impacts and asked for additional information. We were informed that an Ala Moana route had been the preferred alternative for rapid transit in the past, but was ruled out during the current DEIS process primarily because of prior opposition from the federal community. Frankly, we are perplexed that "federal concerns" were cited as the primary reason that the Ala Moana alternative was abandoned, yet we were not consulted during the process of selecting Halekauwila Street as the preferred local alternative. It should have been obvious to DOT that GSA and the federal community would have similar issues on either side of the PJKK Building; and in fact, our concerns are more serious regarding the Halekauwila Street alternative given its more limited set-back.

During our meeting we also discussed serious concerns about the shortfalls in the development and analysis of the City's in-house security evaluation titled, "Potential Threats to Federal Court Building from Transit Viaduct (copy attached). This security evaluation was prepared last year and was not shared with GSA. In fact, we only learned of the existence of this report by second hand sources on February 2, 2009, the day before our meeting. However, we do appreciate DOT's willingness to provide considerable background information regarding the subject report. First, it was confirmed during our meeting that the report was prepared by the City's in-house security staff without any consultation with GSA as the PJKK Building's owner or any federal executive agency tenants such as FBI, DHS, DEA and Secret Service. Second, it was confirmed that the PJKK Building had been inadvertently overlooked as a building with a high risk security rating, and would have otherwise been considered for a compressive and participatory security study similar to those conducted at Pearl

Harbor Navy Yard, Hickam Air Force Base, and Fort Shafter. We were told that DOT acknowledges that a comprehensive security evaluation is in order. Subsequent to our meeting, we received a telephone call from DOT's security consultant, Peter Loverso of Parsons Brinckerhoff, who has requested a kick-off meeting with GSA regarding a security evaluation scheduled for March 31, 2009.

It appears that it is not too late for route changes from a cost standpoint, as evidenced by a recent change approved by the City Council from a routing along Salt Lake Blvd. to an alternative route closer to the Honolulu International Airport. Further, we were informed during the meeting that the alternatives to Halekauwila (Ala Moana and Queen Street) are still considered to be feasible routes from environmental impact, constructability and cost standpoints.

In *Oregon Environmental Council v. Kunzman*, 817 f.2d 484 (9th Cir. 1987), the 9th Circuit held that the form, content and preparation of an EIS should foster both informed decision-making and informed public participation. Certainly, a security evaluation which accurately assesses the true security risks of the Project on PJKK will provide DOT with the ability to make an informed decision about the proposed route on Halekauwila Street in accordance with NEPA.

In conclusion, we look forward to working with the City DOT and its consultants during the process of a comprehensive and participatory security evaluation of the Halekauwila Street route relative to the PJKK Building. However, there should be no foregone conclusion that mitigation of our security concerns should stop short of a possible route change.

Sincerely,



Michael D. Larson
Property Manager

Attachments: December 15, 2008 Letter to DOT
DOT – Potential Threats to Federal Court Building from Transit Viaduct

Cc: Carrie Okinaga, Corporation Counsel
Faith Miyamoto, Chief of Transportation Planning
Leslie T. Rogers, Regional Administrator

Received by: _____

Date: _____



U. S. General Services Administration
Public Buildings Service
PJKK Federal Building
300 Ala Moana Boulevard, Suite 1-336
Honolulu, Hawaii 96850
(808) 541-1950
Fax: (808) 541-3601

December 15, 2008

Wayne Yoshioka, Director
Department of Transportation
City and County of Honolulu
650 S. King Street, 3rd Floor
Honolulu, Hawaii 96813

Dear Mr. Yoshioka:

The purpose of this letter is to express our concerns over the proposed Honolulu High Capacity Transit Corridor Project.

The United States General Services Administration is the record owner of the Prince Jonah Kuhio Kalaniana'ole Federal Building and Courthouse located at 300 Ala Moana Boulevard ("PJKK Building"). We have never received any notice from the City and County of Honolulu Department of Transportation Services Rapid Transit Division (DOT) about this project. As such, we were surprised to learn that the proposed project entails the construction and operation of an elevated transit system along a narrow street directly abutting the PJKK Building on Halekawila Street. As a federal agency and property owner significantly impacted by the proposed project, DOT is required to invite us to participate in the scoping process which appears to have occurred in late Dec 2005 and January 2006. Nor have we received any of the multiple notices of intent issued for this project and the draft Environmental Impact Statement. See List of Draft EIS recipients attached to the Draft EIS.

We hope that this project has not proceeded so far that any possibility of our providing meaningful comment at this time has been eliminated. Our obvious concerns include noise, vibration, security and apparent site easement. We are hereby requesting an immediate meeting with DOT in order that we may be briefed as to the proposed project and its particular impact upon the PJKK Building. We would caution DOT not to proceed on the basis that that any property necessary for this project (including air rights) along Halekawila can be obtained through the eminent domain process since this process is not available against the United States.

We trust that DOT will immediately correct its notice procedures and now include us on the mailing list for this project and provide all documents prepared and invitations of public meetings for the proposed project to the United States of America. Please note that all information should be sent to the PJKK Building as follows:

Michael D. Larson, Property Manager
Public Buildings Service
US General Services Administration
Prince Kuhio Federal Building & US Courthouse
300 Ala Moana Blvd., Suite 1-336
Honolulu, HI 96850-4992
(808) 541-3632
michael.larson@gsa.gov

We look forward to hearing from you at your earliest convenience. Thank you.

Sincerely,



Michael D. Larson
Property Manager

cc: Carrie Okinaga, Corporation Counsel
Faith Miyamoto, Chief of Transportation Planning
Leslie T. Rogers, Regional Administrator

HONOLULU RAIL TRANSIT PROJECT

Potential Threats to Federal Court Building from Transit Viaduct

The construction of a transit viaduct in close proximity to the court house has been evaluated by security specialists for potential security vulnerabilities. As a result of this evaluation, the possibility of an assault from the viaduct to the court house is deemed to be most improbable for many reasons, including: lack of access to viaduct, easy detection of trespassers, lack of sufficient time to plan an attack, lack of time to carry out an attack, lack of a plausible escape route by a perpetrator, challenge of coordination between train schedules and target availability, and alternatives for accomplishing such an assault which would have significantly less risk of failure.

The evaluation team included a PB Force Protection Specialist with extensive DOD experience, a PB Senior Security Specialist who was a former DHS/TSA executive for Mass Transit and a PB Senior Safety and Security Specialist who was the former DOT/FTA Director of Safety and Security. All of these specialists have conducted numerous vulnerability assessments for transit systems, and maintain high security clearances and liaisons with their prior agencies for current threats, threat trends and security best practices.

Part of the evaluation process was examining similar systems the team is familiar with: the Miami Dade People Mover, Detroit People Mover and Seattle Monorail all travel within close proximity of buildings and in some cases within 50 feet. The Detroit People Mover is adjacent to the federal court house. There have never been any threats or incidents from the People Mover.

The evaluation team contacted the intelligence community regarding this possible threat. Factors considered that would dissuade this type of an assault are: lack the ability of "dry runs", challenged by timing of the target versus train schedules, possibility of being detected (during planning and execution of the attack) and the lack of a good escape method. The team also checked for new or existing current threats that would affect this situation; none were identified.

Significant challenges for anyone attempting an assault from the viaduct include an intrusion detection system protecting entrances to the track area, complemented with CCTVs specifically pointed from platform ends to track area. Trespassers will be detected and a response generated, making it very difficult for a sniper to carry out surveillance or an attack successfully.

Security standards for federal buildings are published by the US General Services Administration. After 9/11, the standards were categorized listed as sensitive security information (SSI) and are no longer available without a specific need to know. The US Protective Services and the US Marshals have access to this information. Judges need to confer with them for any guidance in this matter.

November 10, 2008

HONOLULU RAIL TRANSIT PROJECT

A requirement in the System Safety Management Plan (SSMP) is the development of a Security Plan for the construction phase of the project. The construction contractor will be required to develop the plan and address security issues such as this one. There are a variety of measures that can be implemented, including security fencing to restrict access to the guideway, lighting to aid in detection, intrusion detection systems, and security patrols.

Though the evaluation team found this threat to be most improbable, the following security enhancements for the courthouse can be taken:

- Obscure the direct line of view from the viaduct. Installing a screening wall along the viaduct in the areas of access where there is a direct line of view to the courthouse will reduce opportunities for surveillance of the building and access to areas where a direct fire event could be launched.
- Window glass film/frame anchoring. Attaching a clear or tinted composite film over the window's glass to resist a direct fire or blast overpressure; also, it keeps the glass panel together as a single unit, thus reducing flying glass shards (Kobar Towers). However, window frames require anchoring to the building structure and a horizontal catch bar should be installed on the inside of the window to 'catch' the glass panel if the frame fails, thus, preventing the glass panel from becoming a missile hazard.
- Relocate the Judges Chambers. Relocating the judges' chambers to an area of the building that has limited or no direct line of view and limited entry, multi-level access controls. Remove any public, external, or internal identification, signs, boards, menu's, entrances, etc that list directions or locations to Chambers.
- Tint Chamber windows. Prevent the public from seeing into the Chambers to determine if they are occupied by applying a reflective film over the windows. This may also provide environmental conditioning savings to the building and prevent ultra-violet damage to office property.



February 2, 2009

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TRANSPORTATION SERVICES

Regarding: Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement/Section 4(f) Evaluation

The DEIS preface states, "The purpose of this Draft Environmental Impact Statement (DEIS) is to provide... information necessary to make an informed decision, based on a full and open analysis of costs, benefits, and environmental impacts of alternatives considered."

Unfortunately, the DEIS does not provide a full and open analysis of the short and long-term direct, indirect and cumulative social and environmental impacts from the various aspects of the fixed guideway system.

Chapter 1 Background, Purpose and Need

- When the Second City concept was introduced it was billed as a place where people would live and work thus avoiding the long commute into Downtown. Neither businesses nor jobs nor infrastructure have kept pace with housing development thus causing traffic congestion within Kapolei and Ewa and forcing people to still travel long distances to work.
- With more businesses including government offices relocating to Kapolei and a new large shopping center planned how would ridership on the fixed guideway rider ship be affected?
- Figure 1.8 Daily 2007 Transit Trips between Transportation Analysis Areas is totally useless. If this diagram is supposed to show all transit trips – car, bicycle, and bus it missed the point and is nothing but a bewildering maze of blue.

1.6 Potential Transit Markets

- “Despite the large growth of employment opportunities in the Kapolei area, population is projected to outpace and exceed the available employment in the area.”
“Additionally, there will be a bidirectional flow of traffic throughout the day as more City and State administrative offices move their daily operations to Kapolei and as other employment grows in the area.”
- What are the direct and indirect impacts on residents who must travel further from Hawai‘i Kai, Aina Haina and the Windward side to get to government operations that have moved from Downtown to Kapolei?
- What are the direct and impacts on the environment and air quality from the additional vehicle traffic traveling longer distances to Kapolei for government services?
- What are the time and cost impacts to residents who ride the bus from East Honolulu and Windward to government offices relocated from Downtown to Kapolei?
- Makakilo is expected to grow by 125%, which is 25% more than Ewa between 2000 and 2030 yet there is no transit system projected to connect to Makakilo. Why?

Chapter 2 Alternatives Considered

Operating Parameters

- This section states, “It is envisioned that bicycles would be allowed on trains.”
 - At what point in process will the decision be made on whether to permit bicycles on each train?
 - Will the public have opportunities to comment on what types of bicycle facilities are needed?

Table 2-5 Fixed Guideway Operating Assumptions

- What is the “branch-line headway?”
- How many times along the entire fixed guideway route will trains reach 50 miles per hour or greater?
- At what points along the route will trains reach 50 miles per hour?
- At 50 miles an hour what is the distance needed for a train to stop?
- How many trains will be running to meet the 3 to 10 minute time schedule at each stop?
- What is the purpose of having both elevators and escalators at each station?
- What are the maintenance costs per year for all the proposed elevators and escalators?
- What is the yearly maintenance schedule for all elevators and escalators?
- Will bicycle parking be permitted at each station, train platform and train stop?
How many spaces will be allotted for bicycle parking at each station?
- What measures will be used to prevent Hawaii’s homeless from sleeping under the stations, platforms and overhead guideway?
- What measures will be used to prevent graffiti on the columns, stations, platforms and *?
- What maintenance procedures will be to get ride of graffiti and stay on top of it so that the fixed guideway system does not become a glaring mess of spray paint?

Figure 2-19.

- What are the height, width and length of the Transit Center Bridge? Will there be 20 hour lighting and security?

Figure 2-20 Pearl Highlands Station

- What are the dimensions of the station - height, width?
- How many cars will the parking garage hold?
- Will the garage be enclosed and have security and lighting?
- What hours will the garage be open?
- Will the parking garage be a shared use with Pearl Highlands Shopping Center? If so, will the Center contribute to the construction and maintenance costs?

Figure 2-22. Aloha Stadium Station

- What are the height, width and length of the Elevated Connecting Bridge? Will it be covered and have security and lighting?

Chapter 3 Transportation

3.2.1 Existing Travel Patterns

- What is the expected percentage of total daily trips of air passengers that now use ground transportation that will use the transit system to and from the airport?
- What percentage of those traveling in the corridor, and not originating or ending at work, will use the fixed guideway system?
- The DEIS is silent on what the public land under the fixed guideway system in between columns will be used for. Without information on specific uses at specific sites it is impossible to envision or assess direct or impacts of the proposed uses. The FEIS must provide information on the types of uses proposed for each column-to-column segment under the fixed guideway.

3.4. Future Conditions and Effects; Build Alternatives

Reverse Commute Markets

- The DEIS states that “Almost four-fold increase in employment is estimated by 2030 for Kapolei, the quick and direct access provided by the fixed guideway system from PUC Development Plan area locations would help address the demand of future reverse commute markets.”
- How many new jobs does “four-fold” represent?
- What data was used to determine that there would be a “four-fold” employment increase in Kapolei by 2030?
- What is the estimated percentage of students and faculty living in Kapolei, Ewa, Waianae, Makakilo and North Shore that now attend UH Manoa are anticipated to attend the UH West Oahu campus?
- What is the estimated percentage of UH Manoa students and faculty that will travel to UH West Oahu for classes?
- What other government offices are planned for relocation to Kapolei or Ewa?
- What is “the sum of the travel times in between” East Kapolei and the Pearlridge Station?

Changes in Transit and Private Vehicle Demand

- What data was used to determine that the commute-to-work transit share of the Ewa to Downtown travel would increase from 23 % to between 54 and 56 percent?

Access to Fixed Guideway Stations

- Identify the ways that the 2030 No Build conditions would effect the “gradual

deterioration of service reliability” of bus service to parts of the island outside of the study corridor?

- What data was used to determine that access to stations by bus or walking would be 85% of “total trips in the a.m. two-hour peak period?” If this is the case then why are large parking facilities and park-and-ride lots planned for only 15% of the projected ridership?

3.4.3 Effects on Streets and Highways

Table 3-21 Column Placement Effects on Streets and Highways

- What are the direct and indirect impacts on travel time by drivers at the sites where median strips will be expanded and travel lanes reduced?
- What are the direct and indirect impacts on pedestrians at locations where sidewalks will be eliminated??

3.4.4 Effects on Parking, Bicycle and Pedestrian Facilities and Freight

Effects on Parking Supply

- The DEIS states that an “Estimated 820 to 960 off-street and 230 to 250 on-street parking spaces would be removed as result of Build Alternatives...”
- The DEIS further states that, “Future development around station areas-new land uses near stations could change the demand for and supply of parking. These factors could influence how people choose to access the stations and where they would park.”
- While acknowledging the loss of parking and spill over parking into neighborhoods there is no information on short and long term effects on residents and neighborhoods impacted by spill over and construction parking or businesses that depend on street parking.
- What are the direct and indirect impacts to neighborhoods and businesses near and adjacent to the fixed guideway from spill over and construction?
- Identify the areas that will loose off-street parking and how many parking spaces will be lost at each location?
- Identify the areas that will lose on-street parking and how many spaces will be lost at each location?
- Will any of the removed off-street and on-street parking spaces be replaced? If so how many and where?
- What are the direct, indirect and cumulative impacts of removing on and off street on people attending community events and facilities such as parks, libraries, and schools?

Table 3-24

- What is the safety risks to bike riders when shared roadways are reduced from 16 to 14 feet and from 14 feet to 13 feet?
- If the city wants to encourage bicycle riding as a mode of transportation throughout the island and to and from transit then bike riding should be made safer and not more dangerous as the proposed lane reductions seem to be doing.

3.4.5 Mitigation of Long-term Transportation Effects

- Stating that “there is available parking on nearby side streets to accommodate people currently using parking spaces that be lost to guideway construction” only increases

crowding of neighborhoods and is not an acceptable mitigation measure. Neighborhood overcrowding from parking is a serious safety and aesthetic problem so the issue should not be casually brushed aside but must be resolved through community involvement.

- Information from the “detailed surveys for the affected areas” regarding necessary parking placement should have been included in this DEIS so that the direct, indirect and cumulative impacts from loss of parking, construction and spill over parking could have been evaluated.

3.5 Construction-related Effects on Transportation

3.5.1 Construction Staging Plans

- Construction staging areas and plans should have been identified and the locations included in this DEIS. Without information on staging sites it is impossible to assess the direct, indirect and cumulative social and environmental impacts of each site.
- It is unacceptable to state that “Staging areas are not expected to cause a substantial effect” when locations are not known and environmental, social and cultural impacts have not been evaluated.
- Will there be a public involvement component within each effected community in the selection of construction staging site?
- In Kailua unbeknown to the community, a contractor contracted with a private landowner to use a parcel of land, adjacent to a wetland, for a construction staging. While using the site the contractor placed fill in a portion of the wetland. Vigilant residents spent several years documenting the infraction, which resulted in fines to the landowner and contractor, and partial restoration of the wetland. Play this scenario out over the length of the 20-mile fixed guiderail system and years of delay and trashed environmental resources could be the result of not identifying and evaluating construction sites in this disclosure document.

3.5.2 Construction-related Effects on Transit Service

- The DEIS fails to evaluate the direct, indirect and cumulative impacts on Handi-Van services and residents when bus stops are relocated and bus routes are changed during construction at all segments of the 20-mile fixed guideway system.

3.5.4 Construction-related Effects on Parking

- It is unsatisfactory that the “precise effects on parking during construction” will be left to the individual contractors to handle. Data on construction site selection, construction and community parking needs and mitigation measures should have been included in this DEIS so that social, environmental and cumulative impacts could be evaluated in a comprehensive manner.

3.5.7 Mitigation of Construction-related Effects

Maintenance of Traffic Plan

- Will the proposed “extensive public information program” include a public involvement component or will it just consist of information distribution?

Chapter 4 Environmental Analysis, Consequences, and Mitigation

4.1 Land Use

- This section touts all the proposed and anticipated development projects but fails to mention that not all permits for development have been sought or received.
- This is the built it and they will come scenario. As pointed out the fixed guideway system begins and ends in an empty field.
- Why the fixed guideway didn't begin in Downtown and work outwards is a mystery. One key reason, we believe, is that it would have been much harder sell but would have provided a meaningful transportation option in traffic congested areas. Beginning in an open field surrounded with compliant and willing landowners is a much easier sell.
- The undeveloped field where the fixed guideway system begins is far from most residential areas in Kapolei so people wanting to use the rail system will need to use their cars to reach the station. The DEIS is silent on whether new bus routes will be added to accommodate people who want to take the train or where the bus stops will be located.
- Because the Kapolei station is far away from the Kapolei business district people traveling to work in Kapolei will need to use buses to get to work once in Kapolei. We assume that new bus routes will be created so that people can get to their jobs but the DEIS does not provide information on bus routes or the time it will take to get to the Kapolei business district in the traffic congested Kapolei from the Kapolei station. If the bus travel time combined with the rail travel time is too long or comparable to travel by car people could opt to drive from other destinations instead of using the rail system thus negating the purpose(s) of building the rail.
- The FEIS must provide car and bus travel route and time information to and from the Kapolei station for residents living in Kapolei and information on travel time from various locations along the fixed guideway route for people traveling to the business district for work.
- What is meant by the statement "An assessment of potential changes in land use that could result from the improved mobility that would be provided by the long-term operation of the Project?"
- The DEIS states that the "Waianae end of the project that would serve the area where both population and employment are forecasted to grow by approx 400% area includes West Oahu campus, Salvation Army Kroc Center and a master-planned development Ho`opili. All are planned to open between 2009 and 2012. With commercial space envisioned to grow to 7.1 million sq ft compared to 8.4 million sq ft in Honolulu today."
- What are the direct, indirect and cumulative impacts of all the above increased population on the rail system and traffic congestion within Kapolei?
- What percentage of the 7.1 million sq ft of commercial space will be new space, what percentage exists and what percentage is proposed developments that have received permits to build? What are the direct and indirect impacts on commercial businesses in Honolulu from the projected commercial growth in Ewa and Kapolei?
- With the West Oahu campus projected to have 7,600 students and 800 staff and faculty by 2020 what are the impacts on UH Manoa student enrollment?
- The DEIS failed to identify when each of the proposed developments - West Oahu campus, Kroc Center, Ho`opili and new shopping center on Hawaiian Home lands, is projected to be developed in relation to construction of the Kapolei transit station. Without this information it is impossible to evaluate that direct, indirect and cumulative impacts on the environment, water resources, public facilities and traffic. This information must be in

the FEIS.

- It is contradictory to say that TOD special districts within Ewa and Kapolei “would restrict development in agriculture and open space areas” when the Kapolei station, West Hawaii Oahu Campus, Kroc Center and Ho`opili development are all projected to be built on land current designated agriculture.
- If TOD “could occur before the fixed guideway stations are constructed” how does the creation of TOD special districts prevent the conversion of agricultural land to urban uses?
- The DEIS states that approximately 80 acres of prime farmland and 8 acres of statewide important farmlands would be acquired but does not identify where these lands are located and present uses. What is the county zoning for the 88 acres of agricultural land? This information must be provided in the FEIS.
- The DEIS identifies the highly successful Aloun Farm as the largest property facing displacement through acquisition for the 45 acre maintenance facility. How much of the Aloun Farm is prime and/or statewide important agricultural land?
- What is the City zoning for the Aloun farm?
- The DEIS states “Considering that the amount of affected farmland is such a small proportion of all agricultural land on Oahu, the effect would not be significant and no mitigation would be required.” What an insensitive statement. The farm is significant to the operators, workers and general public who enjoy the fresh produce and picking pumpkins in the pumpkin patch, the only place on Oahu where that is possible.
- Does the statement that no mitigation is required mean that the Aloun Farm operators, who we assume lease the land although that information is not in the DEIS, will not be compensated for financial losses once the land is no longer available for farming?
- While the DEIS states that land will be acquired for transportation use the DEIS is silent on whether changes in zoning and land use designations and what types of zoning and designation changes will be sought. This information must be provided in the FEIS.
- What is the present zoning for each parcel that will be acquired?
- How many zoning changes and land use designation changes are anticipated for the entire 20-mile fixed guideway system?
- At what point(s) in the process will zoning and land use designations be sought?
- While the Ewa Development Plan is cited as promoting “higher-density residential and commercial uses along a major rapid transit corridor linking Kapolei with the PUC” this disclosure document does not provide data on what that would look like. Nor does this disclosure document analyze the direct, indirect and cumulative impacts on public facilities, utilities, communities and neighborhoods, population shift, traffic and businesses along the corridor from higher and more concentrated development. The FEIS must provide that information.

Mitigation

- The DEIS states that, “Based on the relatively small number of parcels affected by full acquisitions, the effects on different types of land uses in the study corridor would be minimal.”
- We would not know if the “effects” “would be minimal” because precise information on each parcel that will be partially or totally acquired was not given in this disclosure document. Thus, making it impossible to comment on any impact, direct, indirect or

cumulative, on neighborhoods, communities, businesses, environmental and natural resources and land use patterns.

4.3 Acquisitions, Displacement, and Relocation

The DEIS provides no information on public facility sites land acquisitions. The exact location is not identified nor is information provided on the present use of the land. It is hard to imagine that there will not be impacts by the land acquisition yet without information it is impossible to evaluate the direct, indirect and cumulative impacts.

- Honolulu Community College (0.18 acres)
 - What are the direct and indirect impacts to the College from removing 0.18 acres?
 - Will buildings and students be affected?
 - What purpose is the land being acquired for and how will that use impact the college?
- Waipahu High
 - The DEIS states that acquisition of 0.16 acres effects a “small number of temporary or permanent buildings may be displaced or may require minor modification.”
 - What are the direct and indirect impacts from either displacement or modifications to the school, students and faculty?
 - How many temporary and/or permanent buildings will be displaced or modified?
 - Are there sufficient classrooms or other buildings to accommodate the students, uses or faultily that will be displaced by the land acquisition?
 - What will the acquired land be used for and how will that use impact classrooms, students or other school facilities?
- Leeward Community College (3.94 acres)
 - What are the direct and indirect impacts to the college, students and faculty from the acquisition of 3.94 acres?
 - What will the acquired land be used for? How will that use impact surrounding buildings, classrooms and open space?
 - Does the acquisition leave the area unusable?
- UH Manoa Urban Garden Center (.16 acre)
 - What are the direct and indirect impacts of acquiring 0.16 acres of the Urban Garden Center?
 - Will the Center still be viable, will programs and opportunities be lost or will the garden have to be relocated because of the acquisition?
 - What will the acquired land be used for and how will that use impact the garden?

Affected Community facilities

- Bethesda Temple Apostolic Church (.05 partial acquisition of land)
- Alpha Omega Christian Fellowship (displaced as part of full acquisition of commercial building where church is located)
- Nimitz Field (.58 acres)
- Richardson Field (.05)
- Ke`ehi Lagoon (2.88 acres)
- Aloha Stadium (.08 acres)
- Pearl City Post Office (.06 acres)

- Federal Building 300 Ala Moana (.34 acres)
- Oahu Correctional Facility (.21 acres)
- City office building (not identified)
- Fort Shafter Army Reservation (acreage and location not given)
 - "Military properties include lands used for military operations as well as residential accommodations for enlisted personnel and their families"
- Makalapa Naval Housing (acreage and location not given)
- Pearl Harbor Complex (acreage and location not given)
- Naval reservation (acreage and location not given)
- The DEIS states that "measures to reduce adverse effects on community facilities would be evaluated during future design. Mitigation efforts would involve coordination with individual property owners as necessary."
 - Will there be opportunities for community discussions on the impacts of public land acquisition? If so, identify the opportunities for public involvement.
- While land acquisition may be within the law residents, businesses and public institutions should be given greater respect than to just be identified and mediated. After all these are people, lively hoods, and places where are children learn and play. In some cases, as with the Banana Patch, a whole community will be displaced. Will they ever get back the lifestyle they have now - don't know and we don't think anyone will ever know because mediation will happen behind closed doors.
 - If the parcels slated for parcel or full acquisition were only identified "based on conceptual engineering drawings" when will the actual acquisitions be known? Without accurate acquisition data it is impossible to analyze the direct, indirect and cumulative impacts on public facilities, traffic, communities, neighborhoods and environmental and natural resources.
 - Where will property owners, public and private, be officially notified that their property will be partially or fully acquired? How much time notice will they be given?
 - What policies and procedures are in place to ensure that people and businesses that are displaced will have "comparable housing that is decent, safe and sanitary...and affordable" and that businesses will have equivalent commercial spaces?
 - The DEIS states that "Once it was determined that a parcel would be acquired, the displacement and relocation of residences, businesses and uses were analyzed." What are the results the investigation? Why weren't the results put into this disclosure document so that the direct, indirect and cumulative impacts from full and partial acquisition could be evaluated? That information must be provided in the FEIS.

4.4 Community Services and facilities

Public and community services within ½ mile of project alignment

- The DEIS states that "Countless community facilities, schools, churches, parks and utilities, listed below, have been identified as being within ½ a mile of the fixed guideway."
- Other than a list of affected facilities no information is provided on how properties and/or services will be directly or indirectly impacted.
- How was the use of a ½ mile as a measurement determined?
- At what point(s) within the 26-foot wide fixed guideway system is the ½ mile measured from?

- Without information on where the ½ mile begins and ends at each point in the 20-mile and without showing exact location of properties within the ½ mile it is impossible to evaluate direct impacts on buildings, residents, businesses and communities. That information must be provided in the DEIS.
- The DEIS does not provide any information on how many school within a ½ mile of the fixed guideway will be impacted by noise and at what level. This is critical because if the noise is severe then classrooms and other school facilities might require air conditioning, which will be a huge purchase and installation cost as well as yearly maintenance and electrical costs. This information must be presented in the FEIS.
- How many schools will be impacted by noise from the fixed guideway system and what will that impact be to each school?
- Since school facilities are owned by the state but will be impacted by a city project which arm of government will pay for the costs associated with air conditioning?
- What are the noise impacts from the fixed guideway system on outside events held at schools and other public facilities along the 20-mile fixed guideway route?
- The DEIS identified 58 schools within ½ mile of project alignment
- The following schools are adjacent to alignment and directly impacted
 - Honolulu Community College (0.18 acres all alternatives)
 - Kalakaua Middle School
 - Kalihi Kai Elementary School
 - Makalapa Elementary
 - Moanalua High
 - Pearl City elementary
 - St. Joseph Elementary (private)
 - Waipahu High (.16 acres a small # of temporary or permanent buildings may be displaced or may require minor modification in addition to the required purchase of narrow strip of land all alternatives)
 - Waipahu Intermediate
 - Leeward Community College (3.94 acres all)
 - Maoanlua/Aiea community School
 - UH Manoa Urban Garden Center (.16 acre All)
 - Holy Family Catholic Academy (private)
 - Joy of Christ Preschool (private)

The DEIS identified the following community facilities as being directly affected

- Bethesda Temple Apostolic Church (partial acquisition of land (.05)
- Alpha Omega Christian Fellowship (displacement)
- Nimitz Field (.58 acres)
- Richardson Field (.05)
- Ke`ehi Lagoon (2.88 acres)
- Aloha Stadium (.08)
- Pearl City Post Office (.06 acres)
- Federal Building 300 Ala Moana (.34 acres)
- Oahu Correctional Facility (.21 acres)
- City office building (not identified)
- Fort Shafter Army Reservation (location not given)
 - "Military properties include lands used for military operations as well as

residential accommodations for enlisted personnel and their families”

- Makalapa Naval Housing (acreage and location not given)
- Pearl Harbor Complex (acreage and location not given)
- Naval reservation (acreage location not given)

The DEIS identified 93 religious institutions and being within ½ mile with 19 being adjacent

The DEIS identified 5 cemeteries within ½ mile, with 2 adjacent

The DEIS identified 6 libraries, 5 police stations, 3 fire stations and 6 medical facilities within ½ mile of project the alignment.

The DEIS identified 64 parklands and recreation facilities with ½ mile

- Irwin Memorial Park (public)
- Mother Waldron Park (public)

The Hawai'i Community Development Authority's Master Plan identifies this park as a major community amenity that is crucial open park space as Kaka'ako redevelops into a dense residential area. Since the fixed guideway skirts the mauka boundary of the park what are the direct and indirect impacts on the park and people visiting the park from having an elevated rail system so close?

- Aiea Bay State Recreational Area which received Water and Land Funding are Sec 6(f) resources
- Aloha Stadium
- Navy Housing Community Park (private)
- Navy-Marine Golf Course (military)
- Richardson Field (military)
- Neal S. Blaisdell Park (public) *Received Water and Land Funding are Sec 6(f)
- West Loch Golf Course (public)
- Walker Park (public)
- Future Queen Street park (public)
- Ke'ehi Lagoon Park

- The above lists show that a lot of properties, both public and private, will be impacted by the 20-mile fixed guideway system. This is a huge unprecedented undertaking for our island with unknown implications and ramifications all along the route. Yet, neither data on each property nor a cumulative effects analysis was provided in this disclosure document. Thus, making it impossible to understand or asses direct, indirect or cumulative impacts to the direct properties, public facilities, utilities, communities, neighborhoods and environmental or natural resources.
- While identification of social, recreational, and public facilities is critical lists by themselves are meaningless. There is absolutely no way to evaluate direct, indirect and cumulative impacts to a particular site or collectively when information is not provided.
- The DEIS does not provide information on why the office building that houses the Alpha Church will be purchased. That information must be provided in the FEIS.
- What are the direct and indirect impacts to the vendors at the Aloha Stadium swap meet from the fixed guideway system and station planned for the stadium?
- It is unacceptable to state in this disclosure document that, “Measures to reduce the adverse effects on individual community facilities would be evaluated during preliminary and final engineering design.” The time to “evaluate effects” is during the disclosure phase not after.

- What measures that will be used “to reduce the adverse effects on individual community facilities” must be provided in the FEIS.
- Since this avoidance to detail path has been chosen we predict that there will be countless delays when residents become aware of the threats to their schools, community facilities and neighborhoods.

4.4.3 Environmental Consequences and Mitigation

- While the DEIS states that properties that meet the Federal criteria under Section 4(f) resource have been evaluated that evaluation information is not in this disclosure document.
- Why weren’t the evaluation findings published in this disclosure document so that reviewers could comment on possible direct, indirect and cumulative impacts on the resource and surrounding environment?
- That information must be provided in the FEIS.

Public Services Common to all Build Alternatives

- The DEIS mentions that a Maintenance Traffic Plan will be developed during final design to manage traffic and emergency services during construction.
- Since traffic and availability of emergency services will be major problems during all phases of construction and after completion of the 20-mile fixed guideway system why wasn’t a Maintenance Traffic Plan developed and included in this disclosure document? That information must be provided in the FEIS.

4.5 Neighborhoods

- The DEIS states that the “Project transects 9 city-designated neighborhoods.” “How is a “designated neighborhood” defined and where are the nine neighborhoods located?
- What approvals will the City need from the Hawai’i Community Development Authority (HCDA) before construction of the fixed guideway can begin in Kaka’ako?
- What is the meaning of “projects life cycle?”
- The DEIS states that “The transit agency could experience 3 types of crimes; crimes against persons, crimes involving transit property and other crimes committed on transit property.” What are the other crimes that are anticipated to occur on transit property?
- How many security guards will be hired? How many will be stationed at each station? Will there be security personnel at each station and platform the 20 hours of operation? Will there be security personnel on each train?
- Will there be surveillance cameras at each station and platform?
- Transit Oriented Development is being encouraged around transit stations yet there is no information about the types of zoning changes that will be sought at each location to allow for higher density development. Without location and zoning information it is impossible to evaluate the indirect and cumulative impacts of higher density on infrastructure, traffic, businesses, public and community facilities and adjacent communities. Information on zoning and stations identified for TOD must be provided in the FEIS.
- The DEIS states that “There is a public perception that community cohesion would be adversely affected by the Project. Because the Project would be constructed primarily

within an existing transportation corridor in developed areas, it would not divide or bisect any communities beyond existing conditions.”

4.5.3 Environmental Consequences and Mitigation

- It is not satisfactory to say that “potential new development and redevelopment along the project alignment, as well as the scale of the transit system itself, **may** affect the character of development along the alignment” or that “This change in character **would not have a substantial effect** on the existing development pattern or community character within the surround neighborhoods?” (Emphasis added)
- Substantial is in the eyes of the beholder. It is obvious that the fixed guideway system 30-40 feet in the air will impact residents and businesses in affected areas so they deserve to know how their community, businesses and neighborhood will be impacted. Instead, this document just gives out platitudes.
- What data and measurements were used to determine that changes to the character of a community and surrounding neighborhoods would not be substantial?
- Residents need information and must have the ability to be directly involved in decision making before staging sites are selected, parking spaces removed, lanes closed, bus routes closed or changed etc
- This DEIS was supposed to provide in-depth information on the economic, social welfare, and public health of each community along the 20-mile fixed guideway route yet that information is non-existent.
- What factors were considered in reaching the conclusion that though “...there would be adverse effects to these neighborhoods” “no mitigation is required?”

Mitigation

- The DEIS states that “Ongoing coordination efforts with the public will help develop design measures that would enhance the interface between the transit system and the surrounding community” but does not state what the coordination efforts will be nor does the DEIS define what represents the “surrounding community.” Outreach and coordination must be broad so that information dissemination, conversations and decision-making encompasses neighborhoods that may be affected by secondary impacts.
- What out reach techniques will be used to contact business owners and residents to ensure that those directly and indirectly affected will be informed about construction projects?
- What types of “design measures” will enhance the columns as they run through communities?
- What types of “design measures” will soften the columns, the elevated concrete structures containing the rail tracks and steel-on-steel noises as the train travels through communities every 3-10 minutes?
- What “design measures” will alleviate the noise from construction?
- What “design measures” will alleviate parking and traffic problems when parking spaces and parking for construction workers, transit riders and others move into adjacent neighborhoods?
- What “design measures” will alleviate the inconvenience and disruption when sidewalks and travel lanes are closed, bus stops moved and bus routes changed?

- The more important question is why are these critical decisions being put off until the design phase and not brought forward in this disclosure document for comprehensive evaluation of direct, indirect, cumulative and secondary impacts on neighborhoods, residents and businesses?

4.6 Environmental Justice

4.6.2 Affected Environment

- The list below identifies some of the social and community resources in OMPO EJ area but no information is provided on each facility or how it will be impacted by the fixed guideway system.
 - Goodwill
 - Pu`u wai Momi
 - Pu`uwai Momi Housing Complex Teen Center
 - Salt Lake Apartments
 - Institute for Human Services.
- It is interesting that the most impacted minority community – the Banana Patch was not identified when the OMPO method was used to identify Environmental Justice communities. The Banana Patch was only identified as a 100% minority EJ community after public outreach identified the community as an EJ area of concern.
- What mitigation measures will be used to move families living in the Banana Patch to comparable multi-generational living spaces and conditions, which is an agricultural subsistence lifestyle within an urban setting?
- Because of the broader communities involvement a community meeting, including the participation of a FTA Civil Rights Officer, will be held in the Banana Patch
- What other EJ communities did the OMPO EJ technique miss?
- Generally, environmental justice has to do with the disproportionately negative and heavy impact of activities involving the environment on the health and living conditions of communities of color and low-income communities. Environmental justice revolves around not only who is disproportionately affected by an environmental activity, but also WHO DECIDES? Typically the decision-makers do not reflect the groups who will be affected by their decisions.
- Usually residents in the underserved and poorer communities are unaware of issues and do not participate in government actions. This could be for many reasons: financial, non-English speaking. What efforts will be made to inform residents from EJ communities of pending changes and impacts on their community from the fixed guideway?
- The DEIS did not give any consideration to the higher occupancy density in home residences that's common in the identified communities and the anticipated and unanticipated impacts of the guideway transit system affect on environmental and social health. This information and analysis must be done before the DEIS is accepted.
- To elevate undue strain on identified EJ low-income and minority communities residents must provided information and included in decision-making. Translated information informing affected communities about impacts from construction and a whole host of other changes must be distributed in a way that will encourage and attract participation.
- From the conclusion made in the DEIS “That ...it has been determined that here are equal effects on the OMPO EJ areas and non-EJ areas” and “there are no disproportionately high or adverse effects on OMPO EJ areas” it seems that EJ

communities will be left out of the decision making process once again. Is that what is meant by this statement?

- The DEIS states that there will be impacts, as shown below, but does not identify the direct, indirect or cumulative effect of each of the impacts on the community or neighborhood. Such information must be provided in the FEIS.
 - Impacts from right-of-way acquisition
 - Impacts to community cohesion
 - Impacts to social and cultural resources
 - Visual quality impacts
 - Noise and air quality impacts
 - Traffic and transportation impacts
 - Short-term construction impacts
- There is no information in the DEIS about the Section 8 low-income housing that will be displaced in Waipahu by the fixed guideway system. This too, like the Banana Patch, seems to have escaped OMPOs EJ guidelines?
- What are the direct, indirect and cumulative impacts of displacing people living in Section 8 housing? Will the city assist residents in finding comparable housing?

4.6.4 Public Outreach

- While “Important project notifications” were placed in various ethnic and cultural newspapers it is unclear if information was translated into the languages of people reading those publications? If not, will future notifications be translated into the languages of the people in the effected communities?
- Were public reading materials placed on the website and handed out at community events translated into common languages within the identified communities?
- How much community participation was there from the various EJ communities and how many comments were received from non-English speaking community members?
- It is disconcerting to read at this stage in the process that, “Efforts will be made to identify and coordinate with EJ populations to actively solicit their input.” This statement tells the reader that so far the outreach does not seem to have been garnered much participation by the most vulnerable and less active members in a community and who do not attend Neighborhood Board meetings, call a hotline or post comments on the website.

4.7. Visual and Aesthetic Conditions

4.7.2 Affected Environment

- Visual resources in the project corridor include landmarks, significant and majestic mauka and makai vistas, historic and cultural sites, parks, open spaces and trees and there is no way to mitigate the visual impact of the 30 to 40 foot high elevated 26 feet wide concrete fixed guideway system.
- No amount of designing, paint color or pretending that it won't be as obtrusive as we all know it will be there is no way to mitigate the impact of the elevated fixed guideway, elevated stations with lights that will cast off glare into the nigh sky and will forever mar our visual horizons.
- The only thing that *might* disrupt the intrusion of the fixed guideway system in some places are tall very tall trees, 30 to 40 feet tall trees. But whether planting trees of that

height to block the bleak starkness of the 26-foot wide guideway has been considered is not known because that information has not been provided in this disclosure document.

- What are the “policy documents” that identified significant views and vistas and will govern the project corridor? Why weren’t these documents included in the DEIS?
- What are the mitigation measures that would alleviate the obvious intrusion, loss of property values and views when the 30-40 foot guideway comes “within 10 feet of some facades along Dillingham Boulevard?”
- The fixed guideway system and Chinatown Station 30 feet above Nimitz will be a dominant visual element and bifurcate historical Chinatown from its historical connection to the Honolulu waterfront. Some things can’t be mitigated and this is one of them.
- In downtown views from the 4th and 5th floors would be blocked and trains would create light and glare and stations would increase this effect. The guideway and columns would change the visual character of the streetscape and the historical disconnection between downtown and the waterfront. There are no mitigation measures that can mitigate these impacts.
- On Halekauwila Street the guideway and columns would also block views from the 4th and 5th floors and increase light and glare on upper stories. Visual effects would be high and property values would be low. Can’t have an elevated train whizzing by outside your window and expect peace and quiet, fresh air and breezes and reasonable value for your property should it need to be sold.
- What changes are proposed for historic Halawa Bridge that will substantially change its appearance?

4.9 Noise and Vibrations

- The DEIS identified the properties, listed below, as being affected by noise.
- Over a 26-mile route it cannot be that just these properties will be affected by noise. The FEIS must identify all other properties that will be impacted by noise.
 - 94-340 Pupumomi St – moderate impact to 5th floor and above
 - 1000 Kamehameha at Kauhale St: 14 buildings with moderate impact at ground level
 - 860 Halekauwila: moderate impacts to 6th floor and above
 - 113 Waimanu: moderate impacts to 7th through 9th floors
- One direct impact will be the loss of property value due to noise from the fixed guideway system traveling 30-40 feet past residential and business windows.
- What are the direct, indirect and cumulative impacts from loss of property value for properties affected by noise from the fixed guideway system?
- One direct effect on individual effect will be the loss of breezes and fresh air as residents adjacent to the fixed guideway system will be forced to close their windows and air condition their home. In this age of reducing energy use to eliminate green house gases it is ironic that more people will be resorting to air conditioning due to the fixed guideway system and this can only be expected to get worse as Transient Oriented Developments are build along the 26-mile fixed guideway system.
- It is interesting that the DEIS points out that “Severe noise impacts are considered significant within the context of NEPA and HRS 343.” Yet, the DEIS does not consider noise to be significant since it states that “It is not practical to avoid severe impacts by

changing the location of the project, mitigation measures must be considered and incorporated into the project unless there are truly extenuating circumstances that prevent it.” Without moving the alignment away from buildings the only remedies that come to mind to block out noise from a steel-on-steel train whizzing by 30-40 feet in the air is to close the windows and air condition your home. What a shame.

- Identify the locations where “project noise level would be equal to or above the severe impact level” and “a sever impact would occur.”
- What constitutes a “sever impact” and what, if any, mitigation measures would be used to moderate noise levels?

4.12 Ecosystems

Migratory Waterbirds

- The DEIS states that “the only protected waterbird that nests in Hawaii is the black-crowned night heron.” That is incorrect.
- There are many species of waterbirds in Hawai`i, including the endangered Hawaiian duck, endangered Hawaiian stilt, endangered Hawaiian coot, and endangered Hawaiian gallinule. All are endemic to Hawai`i. The 'auku`u, or heron, is indigenous. All of them nest in Hawai`i, although not all on all islands. There are also a number of migratory waterfowl, and ducks, such as the mallards, and shorebirds.
- The statement that “Over time, the waterbirds would adjust to new structures built for the Project...and avoid the structures” is probably true but Hawaii’s water and migratory birds have never had to compete with a fast moving unyielding object 30 to 40 feet in the air before.
- Unfortunately, the Ecosystems and Natural Resources Technical Report didn’t discuss what will happen when water and migratory birds encounter a train high traveling 30 to 40 feet through the night sky other than to say “over the long term these birds are expected to adapt to the new elevated guideway structure and the presence of the trains, as they have adapted to the presence of highway traffic.” A train traveling high in the sky is different from many lanes of cars. The potential impacts on water and migratory birds should not be so summarily dismissed but data should have been provided and direct, indirect and cumulative impacts on water and migratory birds should have been analyzed. Until all impacts are analyzed and understood this DEIS should not be approved.
- The Technical Report also did not address the effects a constant stream of lights in the cars and on the trains traveling up to 50 miles an hour 20 hours a day would have on water and migratory birds. Information on the impacts must also be analyzed and understood before this DEIS is accepted.
- While the Technical Report acknowledged that, “Construction activities adjacent to the springs and other water bodies where the waterbirds were observed may temporarily affect their feeding habitats” the short and long-term impacts on individual water and migratory birds and cumulative impacts on the species was not analyzed.
- During the observation for the Report several federally listed endangered stilts were present along the alignment and inhabit Waiiau and Kalauao Springs (Sumida Watercress Farm). The federally listed endangered common moorhen has been recorded at the Sumida Watercress Farm. The federally protected migratory native black-crowned night heron have been seen at Moanalua Stream, Kalauao Spring and at

a drainage canal near the Honolulu Airport near Ke`ehi Lagoon.

- Hawaii's federally listed endangered birds are present along the rail alignment and before this DEIS is accepted the direct, indirect short and long-term and cumulative effects of construction activities, lights on the trains and at the stations, train speed, hours of travel, and height of the rail system on Hawaii's water and migratory birds must be investigated, reviewed, evaluated and incorporated into a technical document.
- The Technical Report stated without providing any substantiating data or analysis that, "The Project would not affect wetland sites such as spring-fed wetlands along the route because with few exceptions, the proposed corridor would use existing roadways." The report did acknowledge that "There may be temporary disturbance of endangered and protected waterbirds when construction activities are in proximity to some of the spring-fed wetland sites, in particular the Sumida Watercress Farm (Kalauao Spring) and Waiiau Spring" but then the Report proceeded to say "However, construction is anticipated to be no more than a minor distraction to these birds because they continue to inhabit these wetlands even though they are adjacent to highways that are heavily traveled by vehicles, trucks, and buses, and even though the general area has gradually become more densely developed. Over time, the waterbirds are expected to adjust to new structures built for the Project." While waterbirds may exist at Sumida Watercress Farm and Waiiau Spring they are currently not being disturbed by daily noise and other disturbances from construction activities.
- The above conclusions reveal another reason why this DEIS cannot be approved until in-depth analysis of construction activities on water and migratory birds within the corridor is reviewed, understood and measures in place to ensure that the fragile bird population does not collapse from the urbanization of their habitat.
- In addition the Report states that "Construction activities over Moanalua Stream may temporarily affect the availability of foraging sites for black-crowned night herons, but this species is highly adaptable to altered environments and would adapt to new structures built over the stream." It appears that this conclusion was reached without analyzing the direct, indirect and cumulative impacts of the loss of foraging sites would have on black-crowned night herons. Black-crowned night herons may be adaptable but loss of foraging sites may force them to abandon this foraging area and no data or analysis was provided in this DEIS to indicate that they would ever return.

4.13 Water

Wetlands and Streams

- While the DEIS and Technical Report state that no direct impact to Waiiau and Kalauao Springs, such as placing piers in either spring, is anticipated neither report analyzed short and long-term direct, indirect impacts and cumulative affects to both springs that might occur during construction such as dewatering.
- Neither report analyzed direct or indirect impacts to the Sumida Watercress Farm operations from construction and the completed guideway system other than to note that the shadow from the elevated guideway system might affect water quality. Even that impact was not evaluated or analyzed.
- The DEIS states that, "Some stream crossings would be required along the alignment. In some instances, the discharge of stormwater from the guideway may increase stormwater inflow to some of these waters. However, because stormwater quality is not

expected to be adversely affected, no streams or downstream marine waters are expected to experience negative effects.” The DEIS does not provide any data or analysis to back up that statement. The DEIS also does not provide data or analysis on the cumulative impacts from roadway runoff and rail runoff on streams.

- The Technical Report noted that the endemic listed `o`opu nakea while uncommon was present in Waikele and Waimalu Streams. This is good news. The bad news is that the `o`opu nakea inhabit streams that are within the fixed guideway alignment and so far data and analysis on direct, indirect and cumulative short and long-term impacts to native species within the alignment is not in the DEIS or Technical Report.
- The Technical Report states “Bridge support piers that are 6 to 10 feet in diameter would not inhibit `o`opu nakea from traversing to the ocean during the twice-a-year spawning period.” This leads us to believe that piers will be placed in both streams. Is that true? If so, how many piers will be placed in each stream?
- Unfortunately, the Technical Report does not identify what the impacts to the `o`opu nakea would be during construction or the length of construction activities in and around the streams. That information is crucial to understanding what is needed to protect the o`opu nakea as it migrates to and from the ocean.
- A positive mitigation measure would be to avoid any construction activities in and around Waikele and Waimalu Streams during `o`opu nakea spawning periods.
- Does the alignment go over Pu`o`hala Marsh that has been identified as of critical importance to Hawaii’s endangered waterbirds? If so, will any structures be placed in the marsh? What are the short and long-term impacts of construction activities to the marsh, waterbird habitat and the water and migratory birds that forage in the marsh?
- All temporary and permanent proposed and potential stream diversions for bridges, park-and-ride lots, parking structures and garages, rail stations and platforms were not identified in the DEIS. The locations must be documented in the FEIS.
- It is unsatisfactory to state that, “Detailed delineation would therefore be a future task to be coordinated during the Project’s design phase.” While some aspects of the fixed guideway can be put off to the design phase evaluating temporary and permanent impacts to Hawaii’s streams and wetlands is one of them. This fixed guideway system is not a surprise. It is not something that was sprung on people a few months ago. To not be prepared to provide data and analysis of impacts, direct and indirect of construction and other activities in and around streams and wetlands within the alignment because “insufficient design information at the planning stage (e.g., the exact location of bridge crossings)” was not known or available is unacceptable. This is another good example of why this DEIS cannot be accepted.
- What is meant by the statement in the Technical Report that “Inspection of streams was limited to the location of specific crossings?” Does it mean that not all streams were evaluated?
- The Technical Report provides a litany of information on the Sumida Watercress Farm including that for approximately 530 feet the proposed guideway would be adjacent to the watercress farm. What the report doesn’t say is how close the guideway will be to the farm and what short and long-term impacts a noisy train roaring overhead would have on water and migratory birds who forage and inhabit the farm.
- The Technical Report states that “One major spring-fed wetland system in Kalauao (Sumida Watercress Farm) and an unutilized spring-fed wetland at Waiiau” located

adjacent to the guideway structure “would not cause a direct impact to these wetlands, but shadows cast by the elevated structure may slightly affect water temperatures and affect watercress growth” because the guideway system is within the median of Kamehameha Highway. The Report goes on to say that, “These consequences are anticipated to be very slight to non-existent, based on the proposed guideway’s distance from open water and watercress farming areas. Shade would only reach open water and watercress in the late afternoon.” What is an “unutilized spring-fed wetland?” Where are the data and analysis of direct and indirect and cumulative impacts to the Sumida Watercress Farm from the daily shadow? Where is the data and analysis of direct, indirect and cumulative impacts to the underutilized spring-fed wetland at Waiiau?

- The Technical Report mentions that the alignment would cross Moanalua Stream but doesn’t provide any data on how the alignment will or will not temporarily or permanently impact the stream. Later in the Report it is noted that “Construction activities over Moanalua Stream may temporarily affect the availability of foraging sites for black-crowned night herons, but this species is highly adaptable to altered environments and would adapt to new structures built over the stream.” Where is the data and analysis that identify the temporary and permanent impacts to the stream and evaluates impacts to the foraging site and direct and indirect impacts to the black-crowned night heron? Black-crowned night herons may be adaptable but they cannot afford to keep losing their foraging grounds.
- It is unsatisfactory to state that, “Only some sites proposed for maintenance, storage, and other facilities provide this type of habitat, which would be disturbed and eliminated by the facilities required for the Project” without identifying the sites and providing data and analysis on the temporary and/or permanent direct, indirect and cumulative impacts from disturbing or eliminating these sites. The sites must be identified and information and analysis provided in the FEIS.
- The Technical Report states that the “The Project would not affect wetland sites such as spring-fed wetlands along the route because with few exceptions, the proposed corridor would use existing roadways.” What are the “few exceptions” located and where is the data and analysis to back up this statement?
- It is unacceptable to state in the Technical Report that “There may be temporary disturbance of endangered and protected waterbirds when construction activities are in proximity to some of the spring-fed wetland sites, in particular the Sumida Watercress Farm (Kalauao Spring) and Waiiau Spring. However, construction is anticipated to be no more than a minor distraction to these birds because they continue to inhabit these wetlands even though they are adjacent to highways that are heavily traveled by vehicles, trucks, and buses, and even though the general area has gradually become more densely developed.” Where is the data and analysis to substantiate the claim that construction will only be “a minor distraction” and will cause no harm to the waterbirds or their habitat?
- The Technical Report notes that, “Streams that are over 150 feet wide may require in-water piers to support the guideway. These include Waimalu Stream (140 feet), Halawa Stream (225 feet), Moanalua Stream at Nimitz Highway (270 feet), and Ala Wai Canal (160 feet). An in-water supporting pier with a diameter of 6 to 10 feet maybe required to-span these streams.” Why isn’t data available on whether in-water

piers **will** be required for Waimalu Stream, Halawa Stream, Moanalua Stream and Ala Wai Canal? When will the data and analysis be available? Once again it is unacceptable for information to be missing from this environmental impact disclosure document.

- Is construction activity in the Ala Wai Canal associated with the first 26-miles of the fixed guideway system or with the Waikiki extension? What type of “Accommodations” will be made for paddlers in the Ala Way Canal during construction?
- And finally the Technical Report states that, “Because the Project would avoid all wetlands in the study corridor, no effects on wetlands are anticipated and no mitigation would be necessary.” We guess that all that stuff about shadows over Sumida Watercress farm, possible alignment over or near Pu’o’hala Marsh or disturbing waterbirds “when construction activities are in proximity to some of the spring-fed wetland sites” doesn’t mean anything.
- In summary, the DEIS lacks sufficient data and analysis needed to make informed evaluations on direct, indirect and cumulative short and long-term impacts from construction projects in or near streams, wetlands, and underground springs and not to mention the perpetual impacts once the fixed guideway is completed. Until data and analysis is provided, reviewed and incorporated into technical documents this DEIS should not be accepted.

Groundwater

- While the DEIS notes that drilled shafts will break through the basalt aquifer in several locations information on how severe the breaks will be or analysis of direct, indirect and cumulative impacts at each site on the aquifer is not provided. This information must be provided reviewed, evaluated, analyzed and incorporated into a technical document before this DEIS can be accepted.
- Has data been collected and analyzed for long and short-term and cumulative impacts on the aquifer from the proposed redirecting of current water runoff patterns at several locations along the alignment? If so, what does the data show?
- The DEIS notes that at each diversion site “There would be no long-term changes to groundwater levels, including artesian conditions, as a result of the fixed guideway system.” What data and analysis supports that statement?
- The Technical report states that, “Runoff from the guideway would not likely contaminate groundwater.” What data and analysis substantiates this statement?
- Interestingly in another section of the Technical Report it is stated that, “Groundwater encountered by excavations for pile caps that need to be removed is likely to be contaminated with petroleum products at several locations where excavations are required.” This is where information and analysis would come in handy.
- The Technical Report acknowledges that “places along the Airport alignment where depths to groundwater would be approximately 10 feet below the surface” and for “the remainder of the First Project alignment, groundwater may be encountered at about 10 feet below the surface.” So while it is known that Oahu’s sole source aquifer will be breached a cumulative effects analysis has not been conducted. Until relevant quantitative information is provided and analyzed this DEIS cannot be accepted.
- The Technical Report states that, “Dewatering may be required where groundwater is at levels above the base of the pile caps” but there is no data or analysis of impacts of

dewatering at each site or how will dewatering impact the aquifer?

- Working over Oahu's sole source of drinking water for 26-miles is serious business and cannot be easily dismissed with comments like "No long-term impacts on the SOBA are anticipated." Until **all** short and long-term direct, indirect and cumulative impacts are known, evaluated, analyzed and incorporated into a technical document this DEIS should not be approved.

VIOLATION OF CHAPTER 6E, HAWAII REVISED STATUTES

The Draft Environmental Impact Statement ("DEIS") contains a copy of a letter dated January 10, 2008, from Donna Wong, Executive Director of Hawaii's Thousand Friends ("HTF"), to Wayne Yoshioka. DEIS, App. D, pp. 325-326. In that letter, HTF requested that, with regard to the compliance of the proposed Honolulu Mass Transit Project with the provisions of Chapter 6E, Hawaii Revised Statutes, "it be regarded as an "Interested person" as that term is defined in Section 13-275-2, Hawaii Administrative Rules (HAR) and be accorded all the rights of such persons under Chapter 6E, applicable administrative rules, and all other provisions of law." The letter then described the rights of "Interested persons" and the obligations of the City and County Department of Transportation Services under HAR Chapter 13-275. These provisions afford Interested persons, including HTF, various rights to be consulted during the historic preservation review process conducted by the Department of Land and Natural Resources, State Historic Preservation Division ("SHPD"), that in general parallel the rights of "consulted parties" under Section 106 of the National Historic Preservation Act ("NHPA"). Specific rights include the right to receive SHPD written comments on the proposal and to have HTF's comments on any submittal be considered by SHPD in its review of the Project. Furthermore, SHPD must publish notice of its determinations, and interested persons may appeal SHPD's determinations to the Hawaii Historic Places Review Board.

The DEIS shows that various entities were treated as "consulted parties" under the NHPA and, in September 2008, were sent "one (1) DVD copy of the documents that have been sent to the SHPD as part of our coordination under the National Environmental Policy Act of 1966, as amended and Section 106 of the National Historic Preservation Act. The DVD includes the Purpose and Need and Alternatives chapters of the Draft Environmental Impact Statement (EIS), along with electronic copies of the Archaeological Resources, Cultural Resources, and Historical Resources Technical Reports." See, e.g., Letter Dated September 29, 2008, from Wayne Y. Yoshioka to Ms. Elizabeth S. Merritt, Deputy General Counsel, Law Department, National Trust for Historic Preservation, DEIS App. D, p. 330.

HTF never received a response to its January 10, 2008, letter, and HTF never received the documents sent to "consulted parties" such as the National Trust for Historic Preservation. Accordingly, **HTF has been deprived of its legal rights as an interested person under Chapter 6E.**

The City and County of Honolulu is bound by Chapter 6E, and compliance with the consultation requirements of the NHPA (if such exists) does not obviate the need to comply with the

applicable provisions of Chapter 6E, including the granting to HTF of all of the rights of “interested persons.”

A review of SHPD’s webpage and its “on-line posting of current compliance reviews” shows that, as of February 4, 2009, no postings have been made since July 25, 2008. SHPD’s “archive of past reports” shows no postings for determinations and reviews after 2005. **It thus appears that SHPD has failed to comply with its statutory duty to give public notice of its determinations. Because notice was never given, the 30-day clock for the deadline to appeal SHPD’s determinations has not begun to run.**

HTF requests that it now be sent copies of the same documents made available to “consulted parties” (but NOT to HTF) in September 2008 (i.e., the DVD and copies of the Archaeological Resources, Cultural Resources, and Historical Resources Technical Reports) so that it may exercise its rights as an interested party under Chapter 6E. Because Chapter 6E and its rules allows HTF a period of 30 days to review documents submitted to SHPD for its review, HTF requests that it be afforded a period of 30 days from its receipt of such documentation to submit comments and, further, requests that the comment period for the DEIS be extended as necessary to allow HTF’s comments to be incorporated into and addressed in the Final EIS.

PROBABLE VIOLATION OF SECTION 4(F) OF THE U.S. DEPARTMENT OF TRANSPORTATION ACT RE: KE’EHI LAGOON BEACH PARK

The DEIS, pp. 5-12 to 5-15, discusses the application of Section 4(f) of the Department of Transportation Act (“Section 4(f)”) to Ke’ehi Lagoon Beach Park (“the Park”). The DEIS states that the project alignment for the Airport Alternative and the Airport & Salt Lake Alternative passes directly through the Park and will make direct use of 2.8 acres of this 72 acre park. It is clear from the map provided (Fig. 5-4) will have a significant effect on existing uses of the park and will permanently constrain future park use of the land occupied by the alignment, as well as of that portion of the park located to the north of the alignment.

The DEIS analyzes an alternative routing (illustrated in Fig. 5-5) that would reduce adverse impacts to the Park, while increasing impacts to nearby commercial properties. The FDEIS ultimately rejects this alternative, stating:

To connect the Airport Station and Lagoon Drive Station, the guideway would pass over several additional commercial properties, resulting in at least nine additional full acquisitions and nine business displacements than the proposed alignment. Further, the Lagoon Drive Station would have to be doubl-stacked (one platform above the other), and the guideway would have to be double-stacked from approximately Peltier Avenue to Ahua Street, a distance of about 600 meters. This, and the right-of-way requirements, would result in an

additional \$75 million (2007 USD) in construction costs. For these reasons, this alternative is not considered prudent.

Under Section 4(f), use of parklands may not be authorized for the Project unless the FTA determines that “[t]here is no prudent and feasible alternative, as defined in Section 774.17, to the use of land from the property; and [t]he program or project includes all possible planning, as defined in Section 774.17, to minimize harm to the property resulting from such use.” DEIS at 5-1.

The DEIS fails to justify its conclusion that no “reasonable and prudent” alternative exists to this use of park land. First of all, the explanation for the claimed necessity of “double-stacking” is wholly conclusory and fails to provide any reasoned explanation of why this method of construction could not be avoided. Furthermore, the DEIS fails to acknowledge that use of the **Salt Lake Alternative**, rather than the preferred **Airport or Airport and Salt Lake Alternatives** would appear to provide a “reasonable and prudent” alternative that would avoid any adverse impacts to the Park. **The FEIS should fully address these issues.**

Although this issue is not discussed in Chapter 5 of the DEIS, the DEIS contains a letter dated September 25, 2008, from Wayne Y. Yoshioka of the Department of Transportation, City and County of Honolulu, to Lester K. C. Chang, Director, Department of Parks and Recreation, in which Mr. Yoshioka advises Mr. Chang of “the U.S. Department of Transportation Federal Transit Administration’s (FTA’s) intent to render a Section 4(f) *de minimis* determination” with regard to the Project’s proposed use of Ke’ehi Lagoon Beach Park and obtains Mr. Chang’s acknowledgement of this determination. DEIS, Appendix D, at 318-321. **HTF asks that the FTA reconsider this determination and that all documentation setting forth FTA’s determination and its justification be included in the FEIS.** Furthermore, the quoted letter contains no justification for this determination beyond the purely conclusory statement that “[t]he park’s recreational features and attributes will be fully restored or replaced prior to project completion.” **Chapter 5 of any FEIS should fully discuss and explain the justification for this determination, including an explanation of how the loss of 2.8 acres of park land can be regarded as a “*de minimis*” impact.**

098706

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DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION SERVICES

February 4, 2009

MEMORANDUM

TO: Mr. Wayne Yioshioka
Director, Department of Transportation Services
City and County of Honolulu

FROM: Panos D. Prevedouros, Ph.D. 
Professor

SUBJECT: Comments on Rail Transit Draft EIS

My review was based upon the DEIS section 4F dated November 2008 and particularly of chapter three on transportation impacts. However, most 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 detailed analyses and explanations on the traffic and transportation analyses that were the foundation of the results presented in the DEIS. Italics and quotes refer to direct passages from the subject DEIS and accompanying documentation.

(1) Traffic Analysis Methodology

Level-of-Service: The Synchro 6.0 software suite (Synchro) was used for intersection analysis. Synchro applied the HCM Operational Analysis methodology and intersection input data to estimate control delay at each study intersection.

This traffic analysis method is not suitable for saturated conditions, and is not suitable for corridor and regional studies. HCM mentions these limitations. Almost all traffic elements along this corridor are oversaturated, thus HCM methodologies do not apply (unless the wrong data are used and degrees of saturation are low.) Either way the output is wrong or misleading.

(2) Peak Hour Screenline Level-of-Service Methodology

To measure and describe the local roadway network's operational status, an LOS grading system was developed to describe a facility's operation, ranging from LOS A (free-flow traffic conditions with little or no delay) to LOS F (over-saturated conditions where traffic flows exceed design capacity, resulting in long queues and delays). The operation of the roadway segments was calculated by comparing traffic volumes on roadway facilities to the saturated volume LOS thresholds for each individual facility. The LOS is reported for each individual screenline facility, then weighted by traffic volumes to report overall operating conditions across each screenline

This is an ad hoc method that is not a national standard. It is entirely inappropriate to use the Highway Capacity Manual's LOS measure without using the HCM methodology. The HCM LOS for freeway screenlines is based on density and speed not on volume-to-capacity ratio. Furthermore, the volume to capacity "method" in the DEIS was applied wrongly in the Alternatives Analysis. The table on the top half of page 3, in which all black cells are the reviewer's corrections, shows that general purpose traffic was estimated to be 31% above capacity (estimate of 1.31) but by their numbers, the correct estimate is 62.5% over capacity (estimate of 1.625.) Capacities are not revealed everywhere in the DEIS, so the reviewer cannot check the same calculations in the DEIS.

(3) Forecasts

Neither the DBEDT (provider of some of the base forecasts), nor the City nor their consultants understand that most growth phenomena in a metropolitan area concerning city expansion and their traffic follow an S-curve depicted by many years of existence as a village, transitioning to a city, several years of growth into a metropolitan area followed by a very long period of maturity with small growth (and decrease) periods. This study erroneously assumes a large future growth for west Oahu and nightmare traffic scenarios whereas Oahu's population, development and tourist attraction have ended their sharp growth and have entered their mature level with a lot of negative bumps along the way. For example, DBEDT Data Book Table 1.06, Honolulu population in 2006 was 906,715 and it dropped to 905,601 in 2007 which was before the sharp economic downturn of late 2008 which is expected to last till 2011.

As shown in the figure on page 3, if S-shape forecasts were used, then the unrealistic demand levels shown in the Alternatives Analysis (AA) would never had appeared. However, something inexplicable happened between AA and DEIS: Screenline demands have been reduced by 28% without any explanation. As shown in the table on page 3, demands in the 2008 DEIS are lower by 28% for year 2030 compared to what they were in the 2006 Alternatives Analysis.

Such a discrepancy (28%) in demand produced by the OMPO forecasting model is highly suspect. Qualified alternatives such as TSM and Managed Lanes were dismissed based on high demand figures in the AA which were subsequently modified in the DEIS. A supplemental DEIS is needed to evaluate qualified alternatives with the reduced demand forecasts.

(4) Localized Traffic Analysis at and near Stations

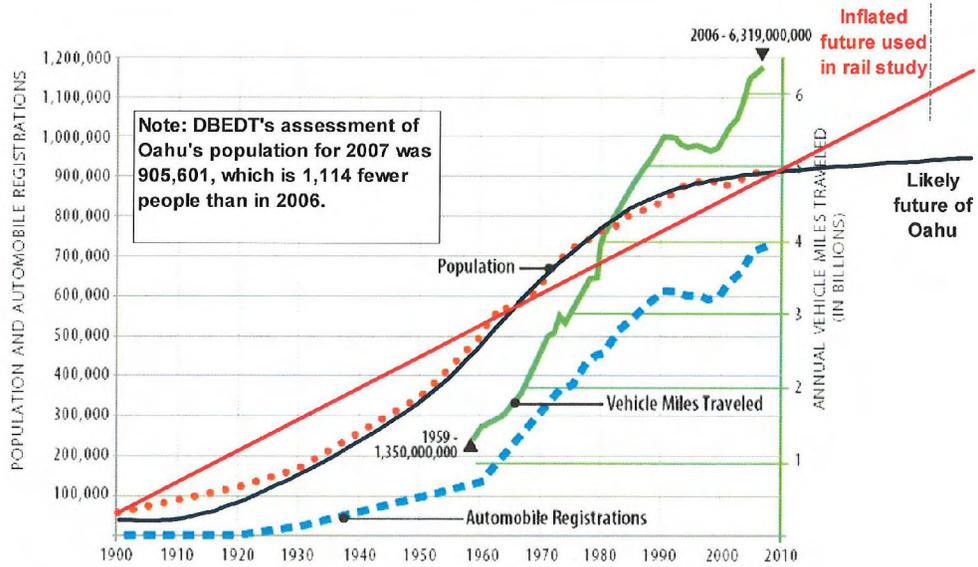
...However, the nature of the system's operation is such that traffic could increase at localized levels, thereby requiring further analysis. These reasons include the following factors: [bullet list omitted]

While a number of good reasons are listed for induced and circulating traffic around stations (how were taxis accounted for?), the analysis is localized and the impacts of these trips on the whole are not assessed, therefore, the DEIS models produce underestimates of vehicular VMT, vehicle hours, pollution and regional congestion for the Rail scenario.

In general, this is a piecemeal analysis that is not appropriate for a project of this magnitude and with such pervasive construction and bus routing impacts.

AA Table 3-12		2030 Rail			
Kalauao Stream Koko Head bound		20-mile Alignment Kapolei to Ala Moana Center			
	Revised Facility Capacity	Forecast Volume (vph)	Volume/Capacity Ratio-AA	LOS	Correct volume/capacity estimates
H-1 Fwy	9,500	17,209	1.811	F	
H-1 Fwy (HOV)1	1,900	2,740	1.442	F	
H-1 Fwy (Zipper) 1	1,900	2,241	1.179	F	
Moanalua Rd	1,700	853	0.502	A	
Kamehameha Hwy Managed Lane	3,450	3,059	0.887	D	
Total General Purpose Traffic	14,650	21,121	1.310	F	
Total HOV Traffic	3,800	4,981	1.310	F	1.324 1%
		26102			

DEIS (from Technical Report Appendix C Table C-3)		2030 with First Project Salt Lake Option				
Kalauao Stream Koko Head bound		2030 Facility Capacity DEIS	Forecast Volume (vph)	Volume/Capacity Ratio-2	LOS	Correct volume/capacity estimates
H-1 Fwy	9,500	12,170	1.281	F		
H-1 Fwy (HOV)1	1,900	1,640	0.863	E		
H-1 Fwy (Zipper) 1	1,900	1,460	0.768	D		
Moanalua Rd	1,700	1,290	0.759	D		
Kamehameha Hwy Managed Lanes	3,450	2,350	0.681	E		
Total General Purpose Traffic	14,650	15,010	1.08		1.149	
Total HOV Traffic	3,800	3,100	0.82		0.819	
		18910	28%			errors



Source: City and County of Honolulu Department of Business, Economic Development and Tourism, 2007.

Figure 3-1: Historic Trends in Population, Vehicle Ownership, and Vehicle Miles Traveled for O'ahu

(5) 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.

(6) No Build Assessment of ORTP 2030 Congestion Relief Projects

Page 3-16: *"Even with \$3 billion in roadway improvements under the No Build Alternative, traffic delay in 2030 would increase by 44%".*

If one was to correctly model all the committed congestion relief projects in ORTP 2030 (Table 2-3) and combine them with a the fact that Oahu population has been stagnant or falling (and bound to further fall due to poor economy and housing unaffordability), the highway congestion in 2030 could be improve by at least 15%.

For example, the PM zipper alone will carry about 1,500 vph through the Kalauao screenline with 3 or more people in them resulting in a person capacity of 4,500 going west. These are people removed from the existing network thus providing a substantial relief.

The westbound utilization of the rail will be optimistically 6,000 people through the Kalauao screenline of whom at most half will be drivers and ex-carpoolers or 3,000 people.

The PM zipper combined with a Nimitz flyover practically guarantee a continuous trip at 55 mph from Iwilei to Waikoloa to Kapolei. This commute is half as long in duration as that by rail.

Therefore, the PM zipper alone that carries more persons than rail can be more beneficial than rail. However, the DEIS tries to convince us that major traffic congestion relief projects will yield "peanuts" whereas the rail with its inferior speed and 15+ stops to Kapolei will yield superior travel time savings and traffic congestion improvements.

Part of the reason is likely that planning models are insensitive to bottlenecks and only provide rough estimates based on some assumed values of capacity. Until this author sees proof of use of a regional microsimulation traffic model assessing the impacts without and with correctly modeled ORTP 2030 projects, he asserts that the analysis method was inappropriate and largely incapable in assessing the benefit of the projects in Table 2-3 of the DEIS.

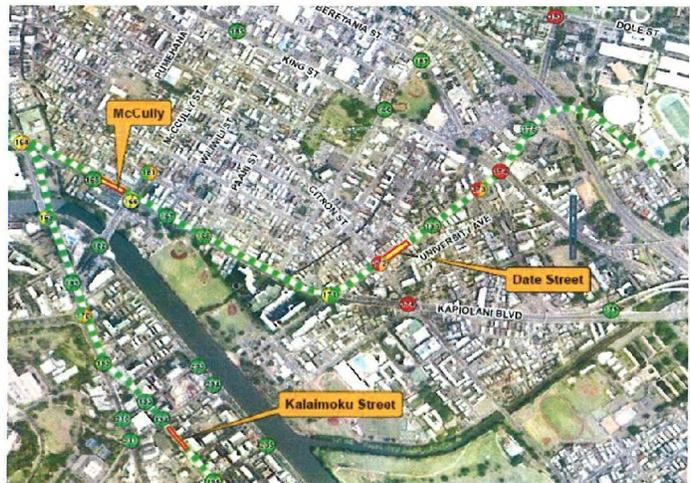
(7) TOD Potential Not Assessed

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?

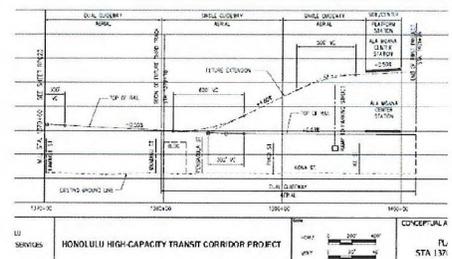
(8) Over the H-1 Freeway at University Avenue?

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!



(9) Two Stations at Ala Moana Center?

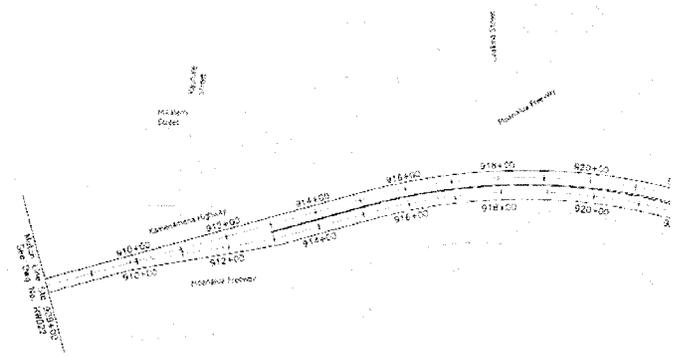
The Ala Moana Center station arrangement is a mystery. In the 20 mile plan, the station is approximately at the 3rd floor level. In the 30 mile plan the station is approximately at the 6th floor level. What is the exact plan for the Ala Moana Station and how can the guideway expand past the Ala Moana 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.

(10) 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?



(11) OMPO Never Rejected Pearl Harbor Tunnel as Claimed in Table 2-2

The DEIS is wrong in claiming that OMPO 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.

(12) 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.

(13) DEIS Base Travel Times Are Inaccurate.

Having resided in Kapolei for a short period in 2007, I know from personal experience that the morning peak period travel time from Kapolei to downtown is always under 75 minutes in the absence of rain or any lane closure. I was startled that the DEIS uses a time of 89 minutes.

I took the opportunity to ask people listening to a radio program that I participate to make some measurements of travel time from the H-1 freeway on-ramp to Alakea Street in downtown if they depart Kapolei between 6 AM and 7 AM. So far I received six qualified measurements of 49, 62, 75, 50, 62 and 59 minutes averaging at about 60 minutes. Therefore, roughly speaking the DEIS uses a 50% overestimate of the travel time which leads to false benefits of travel times by rail.

The DEIS fails to demonstrate the root causes of traffic congestion. The same travelers reported these airport-to-Alakea travel times: 18, 16, 41, 11, 30 and 25 minutes for an average of 23.5 minutes (DEIS uses 25 minutes). The real issue therefore is the traffic flow condition on Nimitz Hwy. which vary widely as these travel times show: 11, 16 or 18 minutes with good conditions,

25, 30 or 41 minutes with poor conditions. This makes it clear that a roughly two mile long Nimitz Viaduct will provide a consistent travel time from airport-to-Alakea of about 6 minutes, reducing the peak hour trip from Kapolei to downtown from about 60 minutes to about 40 minutes. A relatively modest investment solves a huge part of the morning commute congestion.

Note that rail will be providing airport-to-Alakea transit travel time of about 50 minutes (It is 50 to 54 minutes depending on the route selected. The airport route provides the longest travel time for this origin-destination pair.)

(14) 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?

(15) Rail Travel Times 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.)

(16) TheBus Inventory

In reference to Table 3-12: TheBus 2007 Vehicle Inventory: Why is this inventory taken from "National Transit Database, 2007" and not directly from TheBus or the City? Why is the total passenger capacity not listed?

At any given time, what percentage of these buses are service ready as opposed to 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 capacity. A case in point is the picture shown above. It was taken at 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?

(17) TheBoat as a Threat to the Rail

TheBoat vessel inventory in page 3-31 is wrong. It should also be mentioned that its schedule reliability is poor due to frequent mechanical failures and high seas.

Since we spend the significant amount of \$6 million a year on TheBoat, why didn't the DEIS estimate the productivity and congestion reduction of this alternative transportation mode? Will TheBoat reduce rail's ridership?

(18) 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.”

(19) 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 the exact opposite.

(20) Forecasts from the OMPO model

There is a long list of limitations of the OMPO model used to develop the all-important rail forecasts. Here are a few:

20.1) The model was developed in 1994 by Parsons Brinkerhoff. It is very old in terms of both architecture and data validity. It is also of interest that the same person who developed it as a Parsons Brinkerhoff forecaster now is an Federal Transit Agent who inspects the forecasts.

20.2) The model has parameters for dead attractions such as the Kodac Hula Show and the Dole Cannery, but has not parameters for Supercerry, Ko Olina, Water Adventures Park, North Shore and Haleiwa.

20.3) The OMPO model is hardly a modern activity-based microsimulation platform. It is an old, aggregate platform with highly compartmentalized trip definitions such as

wh journey-to/from -work, home-based work
wo journey-to/from -work, home-based other
wn journey-to/from -work, non-based
ww journey-to/from-work, work-based
aw journey-at-work, work-based
an journey-at-work, non-based
nk not-work-related, home-based k-12 school
nc not-work-related, home-based college
ns not-work-related, home-based shop
no not-work-related, home-based other
nn not-work-related, non-home-based

It is also extremely cumbersome to use as use as this note tells all: *Each of the eleven trip purposes requires a separate application of program MC.* So just for the weekday morning travel one has to run the mode choice model 11 times to determine if rail will have any share of the passengers using coefficients that were “adjusted” from other cities. Given that TheBus share is high compared to other cities with bus systems, I suspect that the adjustments were very generous in favor of rail. The DEIS does not present or explain any of this.

20.4) The OMPO model depends on many assumed static capacities for various facilities. This makes it susceptible to range errors and easy manipulations. Note that the transit factor table depends on congested times. It would make sense that more people would choose transit from Kapolei to downtown if a time of 90 minutes is used instead of the correct time of 60 minutes. And that was done.

Same concern applies to arterial and freeway capacity which can be arbitrarily set too high or too low to satisfy the objective of the analysis such as “promote rail and undercut HOT lanes.”

Transit Factor Table

To begin the travel demand process, an estimate of congested times is required.

Capacity Table

The format of the capacity table records is as follows:

...
 7 27-31 Capacity for area type 5 (vehicles / lane / hour) F5.0
 ...
 3 05 1000 1050 1050 1050 1100 1150 1200 1300
 ...

Note: The capacities on the table are vehicles per lane per hour.

Thank you for the opportunity to provide comments.



Waikiki Improvement Association

29872

January 30, 2009

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

RECEIVED
PLANNING DIVISION
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Subject: Comments on the Draft Environmental Impact Statement
for the Honolulu High-Capacity Transit Corridor Project

Dear Mr. Yoshioka,

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the Honolulu High-Capacity Transit Corridor Project (HHCTCP).

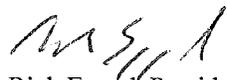
The Waikiki Improvement Association continues to follow with great interest how the Honolulu High-Capacity Transit Corridor Project will improve the ability of people to move in the highly congested east-west corridor from Kapolei to the University of Hawaii at Manoa and Waikiki. We continue to support the Project.

We have taken a keen interest in carefully examining the Project's impacts as documented in the DEIS. Our evaluation is based upon identifying needed commitments to assure the HHCTCP supports the facts and findings of the DEIS and the achievement of the Waikiki Transportation Strategy to the maximum degree possible.

Our comments on the last three pages of the attached document address the following three areas: 1) the need for a high quality transit link between the Ala Moana Center station and Waikiki, 2) the need for implementation of pedestrian and bicycle connections as recommended in the City's Waikiki Livable Community Project, and 3) further definition of an off-street transit center at the Ala Moana Center station designed to accommodate the enormous travel demands anticipated at this location.

The Waikiki Improvement Association appreciates the opportunity to offer comments on the HHCTCP DEIS.

Sincerely,


Rick Egged, President

Attached: Waikiki Improvement Association Comments On The Honolulu High-Capacity Transit Corridor Project Draft Environmental Impact Statement (DEIS) / Section 4(f) Evaluation, November 2008.



Waikiki Improvement Association

Comments On The

Honolulu High-Capacity Transit Corridor Project
Draft Environmental Impact Statement (DEIS) / Section 4(f) Evaluation
November 2008

Introduction

The Waikiki Improvement Association (WIA) has reviewed the Honolulu High-Capacity Transit Corridor Project (HHCTCP) Draft Environmental Impact Statement (DEIS) dated November 2008. Comments are preceded by highlighting the references to Waikiki in the DEIS and summarizing the Waikiki Transportation Strategy. Comments focus on identifying commitments needed to assure the HHCTCP supports the facts and findings in the DEIS and the achievement of the Waikiki Transportation Strategy to the maximum degree possible.

HHCTCP DEIS Facts and Findings

The DEIS acknowledges Waikiki's prominent position as a major transit travel market with the following statements:

- "Overall, the largest share of TheBus riders' trips originate in Waikiki." (page 1-13)
- "In 2007, O'ahu hosted 4.6 million visitors (DBEDT 2008), who take more than 17,000 transit trips daily. Many of these visitors stay in the Waikiki area and travel to points of interest outside of Waikiki, including many of the activity centers in the study corridor. (page 1-19)
- The DEIS identifies "Visitor trips from Waikiki" and "Work trips to Waikiki" as "Key Transit Markets" with "Estimated Transit User Benefits Resulting from 2030 Build Alternatives (Hours per Day)". (page 3-36)

The DEIS identifies transportation problems justifying the HHCTCP as a preferred solution. Many of these identified transportation problems feature references to Waikiki transportation issues:

- Waikiki bus service has reliability problems. Route 42 has the largest reliability problem (as depicted by schedule increase) over the 1992 to 2008 period of those routes included in Figure

1-11. Route 42 travels from Ewa Beach to Waikiki, is "...part of the system's backbone..." with the second highest number of boardings of the selected routes included in Table 3-5. (pages 1-18 and 3-9).

- Waikiki has traffic problems, but Waikiki is not included in the list of committed congestion-relief projects in the O'ahu Regional Transportation Plan. (page 2-13)
- Waikiki has parking problems. "On- and off-street parking facilities are heavily used in Downtown Honolulu, Waikiki, and along University Avenue...Inadequate parking supply has been a long-term problem in this portion of the study corridor." (page 3-15)

The DEIS concludes that the HHCTCP will benefit Waikiki with the following:

- "Bus and fixed guideway departures and arrivals would be coordinated and predictable to minimize transfer time..." (page 2-36)
- "Substantial increases in transit share would also occur...the Waipahu to Waikiki market would increase from 8 percent ... to 26 percent..." (page 3-33)

The DEIS identifies several important unresolved issues potentially significant to Waikiki:

- Funding sources for an extension to Waikiki are not identified. "...planned extensions, would be constructed once additional funding is secured." No potential sources of funding for extensions are identified in the DEIS. (pages 2-38 and 6-1 to 6-11)
- Transit center details are characterized, but not specified. "Bus transfers would be made at off-street transit centers adjacent to fixed guideway stations at ... Ala Moana Center." No Ala Moana off-street transit center is illustrated in the DEIS. (page 2-36)
- Transit service details are characterized, but not specified. "Enhanced bus service would be provided between the terminal stations of the Project and the planned extensions of the fixed guideway system. System improvements, including traffic signal priority, automated vehicle identification, and off-vehicle fare

collection, would complement frequent bus service at ... Ala Moana Center Station." No specific service frequency intervals are identified in the DEIS. (page 2-36)

- Transit demand entering Ala Moana Center in 2030 is 18,750 to 19,180, roughly three times higher than any other station. No specific analysis is included in the DEIS to accommodate this extraordinary volume of passengers. (Figure 3-12, page 3-31)
- Transit travel time between Honolulu International Airport and Waikiki is a determining factor for supporting the 2030 Airport Alternative. Section 7.5, Important Trade-offs, should include these important destinations in the comparisons presented (Figure 7-9, page 7-11).

Waikiki Transportation Strategy

The DEIS review was conducted in the context of the Waikiki Transportation Strategy. This strategy is founded upon the 1999 report "Recapturing the Magic of Waikiki" and its following expectation:

"In Waikiki the pedestrian, visitor and resident alike, will come first. Waikiki will be a pedestrian-oriented resort and a pedestrian-oriented residential area. Walking will be the primary mode of getting around within Waikiki and it will be a pleasurable way to enjoy Waikiki."

The problem encountered with seeing this expectation achieved is that too much traffic in Waikiki conflicts with pedestrians. It is unclear how future actions to implement the HHCTCP may help to solve Waikiki's transportation problems. It is reasonable to expect that safer and more direct pedestrian connections than exist today must be investigated with rail terminating at Ala Moana Center.

Waikiki needs to immediately achieve the expectation of a "Pedestrian First" policy to retain and strengthen its standing as one of the world's premier destinations, to maintain its Hawaiian sense of place and to invigorate its economic vitality. To do this, Waikiki requires the highest quality multi-modal transportation system possible.

Waikiki's multi-modal transportation system needs to keep pace with its continuing transformation. Waikiki needs to evolve from a typical vehicle traffic congested urban atmosphere into a more appealing pedestrian-oriented environment reflective of its unique heritage. Waikiki's transportation infrastructure and services need proper prioritization and reorientation to respond to the "Pedestrian First" policy.

Solutions Required

The Transportation Strategy builds upon previous efforts to update and advocate for the highest priority transportation solutions. Actions are drawn from past work completed by the City and County of Honolulu with the full involvement of the public such as the Waikiki Livable Community Project (December 2003). Three of the five solution elements directly relate to comments on the HHCTCP DEIS. These three elements are summarized as follows:

1. **Create High Quality Transit Link.** The Waikiki Livable Community Project (WLCP) included an analysis and set of recommendations predicated upon the creation of a high quality transit link to Ala Moana Center, downtown Honolulu and other nodes along the primary urban corridor. Such a link is needed now more than ever to the future rail station at Ala Moana Center.
 - a. Direct Transit Link -- The transit route alignment must be quickly and easily understood. This is achieved using the most direct connection possible with Ala Moana Center.
 - b. Vehicle Types -- The transit alignment will be operated with advanced design vehicles that are environmentally progressive and reflective of Waikiki's standing as a major international resort destination with emphasis on safety, comfort and cleanliness.
 - c. System Improvements -- The transit operation will feature advanced technology passenger information system displays to make it very easy for people to identify how the link operates and how to use it.
 - d. Traffic Priority -- The transit operation must be given the highest priority at intersections except where pedestrians and bicyclists are given higher priority. General purpose traffic should be given lowest priority.
 - e. Service Frequency -- The transit connection must have service intervals between departures equal to, or more frequent than, the rail operation at Ala Moana Center.
2. **Create Safe Pedestrian and Bicycle Connections.** The Waikiki Livable Community Project included a set of pedestrian and bicycle recommendations. These require immediate implementation before rail becomes operational at Ala Moana Center with added network elements to offer a high quality link to Waikiki.

- a. Wider Sidewalks – Construct projects as identified in the WLCP.
 - b. Ala Wai Pedestrian-Bicycle Bridges – High quality connections are essential between the termination of rail at Ala Moana Center and Waikiki.
 - c. Intersection Re-orientation – Priority must be given to pedestrians and cyclists. Traffic signal wait times for pedestrians must be reduced.
3. **Locate Strategic Parking Capacity.** Parking facilities are needed to replace on street parking to allow many of the proposals outlined to proceed. Parking facilities are needed to replace displaced off street parking and offset future development needs.
- a. Candidate Sites Have Been Identified:
 - i. Central location – Fort DeRussy. National Defense Authorization Act for Fiscal Year 2002 (sec. 2832). Authorizes the Secretary of the Army to enter into a lease with the City and County of Honolulu to allow the City to construct and operate a parking facility.
 - ii. Central location – Residential. Two sites have been identified primarily for residential, long-term parking:
 1. Kuhio-Kaiolu. Increase the 72 current municipal parking spaces up to 525 spaces with a four-level parking structure.
 2. Aloha Street. Three-level parking structure.
 - iii. Peripheral location – Kapahulu Corridor. An undeveloped site owned by DLNR may be available through the lease holder. The property (0.57 acres) is surrounded by the Prudential Locations building to the north, the Ala Wai Golf Course to the west and a Board of Water Supply booster station to the south. Adjacent sites may be available. Other sites in the corridor might warrant exploration.
 - iv. Peripheral location – Kapiolani Corridor. Several undeveloped sites (owned privately) are situated between Kona and Kapiolani Boulevard in close proximity to the proposed Ala Moana terminal rail station. Some of these sites have potential for a combined parking and bus terminal. Other sites along Kapiolani might warrant exploration.

- b. Financial Approach Is Viable. Construction could be funded with municipal bonds repaid through parking revenues and in lieu of parking payments.

HHCTCP DEIS Comments

WIA supports the HHCTCP DEIS and the implementation of the Project. WIA concludes that the intent of the Project is substantially supportive of the intent of the WIA Transportation Strategy. WIA seeks further clarity to be offered in the Final Environmental Impact Statement (FEIS). In consideration of the facts and findings in the HHCTCP DEIS and WIA's Transportation Strategy the following comments are offered:

1. A high quality transit link as outlined in the WIA Transportation Strategy is essential. Figure 2-8 on page 2-18 of the DEIS includes an extension into Waikiki from Kapiolani Boulevard along Kalakaua Avenue to Kuhio Avenue with stations at the Hawaii Convention Center, the vicinity of Kalaimoku Street and Kuhio Avenue as well as a terminal stop near Liliuokalani Avenue and Kuhio Avenue.

The Waikiki Improvement Association appreciates the need to guarantee access for not only our visitors but employees and residents as well. We believe that Waikiki is well served by the City's award winning bus system. WIA's primary concern with the High-Capacity Transit Corridor Project Waikiki spur proposal is the loss of street capacity created by locating an overhead line down Kalakaua and Kuhio Avenues.

We have concerns over the aesthetic and physical density issues of locating the overhead track in a resort and residential area. The Waikiki Improvement Association urges the City and County of Honolulu to continue to serve the area by bus transit or some other high quality transit link rather than add an overhead fixed guideway into Waikiki.

The high quality transit link must provide the minimum elapsed travel time possible not just between Waikiki and Ala Moana Center, but other important destinations as well such as the Honolulu international Airport. Therefore, we strongly endorse the alternatives including the Airport alignment.

The DEIS confirms that "Overall, the largest share of TheBus riders' trips originate in Waikiki" and many of these riders will likely be those forecast to be entering the Ala Moana Center station by other modes. This will constitute, by far, the highest passenger volume accessing the

rail system. More specificity is needed in the FEIS. The FEIS should identify:

- a. A transit route alignment linking Ala Moana Center with Waikiki and preferably follow the one developed for the WIA's Transportation Strategy.
 - b. The types of buses intended to be used for the most important transit routes, such as between the Ala Moana Center station and Waikiki.
 - c. The specifics of the featured system improvements such as advanced technology passenger information system displays, traffic signal priority, automated vehicle identification, and off-vehicle fare collection.
 - d. Specific intersections along the most important bus shuttle transit links where the bus will be given highest priority at intersections except where pedestrians and bicyclists are given higher priority.
 - e. The service intervals for high priority transit connections. The FEIS should identify the link to Waikiki with a service interval between bus departures equal to, or more frequent than, the rail operation at Ala Moana Center.
2. Pedestrian and bicycle connections, as outlined in the WIA Transportation Strategy, should be identified in the FEIS. The Waikiki Livable Community Project included a set of pedestrian and bicycle recommendations. These require immediate implementation before rail becomes operational at Ala Moana Center with added pedestrian and bicycle network elements to offer a high quality multi-modal transportation links to Waikiki. The FEIS should identify:
- a. The need to construct the projects as identified in the WLCP to support the HHCTCP.
 - b. The need to construct high quality pedestrian and bicycle connections between the termination of rail at the Ala Moana Center station and Waikiki to support the HHCTCP.
 - c. The need to give priority to pedestrians and cyclists. Traffic signal wait times for pedestrians at key intersections must be reduced to support the termination of the Project at Ala Moana Center station.

3. An Ala Moana Transit Center station transit center should be identified in the FEIS. The DEIS states: "Bus transfers would be made at off-street transit centers adjacent to fixed guideway stations at ... Ala Moana Center." The WIA Transportation Strategy includes locating strategic parking capacity. The Ala Moana Transit Center station transit center and the WIA Transportation Strategy represent a consistent opportunity for a private-public partnership at this location. The FEIS should include further definition of the needs to accommodate the enormous travel demands at an off-street transit center at the Ala Moana station.

298752

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February 6, 2009

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City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii, 96813

RECEIVED
PROJECT TRANSPORTATION
FEB 6 3 54 PM '09

Re: Honolulu High-Capacity Transit Corridor

Aloha kakou,

As a graduate student at the University of Hawai'i at Manoa, I have avidly awaited the Draft EIS for this project. As I have a B.S. in Civil Engineering, specializing in Transportation Engineering (U. Minnesota '86), along with several years of work in transportation noise analysis, I have been asked to study and comment upon this project on many occasions, and I have studied it extensively, including through field research.

I think the Draft EIS is substantially adequate and should be approved without amendments. Regarding routing, I think the Salt Lake Boulevard alternative should be chosen, with a branch line to the Honolulu airport leaving the mainline near Middle Street and Dillingham Boulevard.

The first segment constructed should be between Kapolei and Pearl City to 1) provide two potential option for the necessary vehicle maintenance and storage facility, and 2) relieve station and parking capacity problems resulting if the Pearl Highlands transit center were the 'Ewa-side terminus. Although the existing Kalihi bus garage might be an adequate place for a temporary/secondary facility, that facility would have to be replaced elsewhere at considerable cost. Moreover, terminating major routes like 40 (Makaha), 42 ('Ewa Beach), and 52 (North Shore) at Middle Street and Dillingham Boulevard would inconvenience a large fraction of the rail system riders, since that location is not a major activity center or residential area. Incidentally, one major transit system that made a similar decision is Bay Area Rapid Transit (BART); its first segment was between Concord and Walnut Creek, California near a major maintenance center, and it did not extend across the Bay to San Francisco until ten years later (BART 2008, p. 1-4).

Having dispensed with these preliminaries, I would like to share research I have developed on the principal build alternative to the fixed-guideway transit line: A multi-lane elevated roadway. This was embodied by the "Managed Lane" alternative in the 2006 Alternatives Analysis, and the "EZ-Way" HOV/BRT (High-Occupancy Vehicle/Bus Rapid Transit) project proposed by Dr. Panos Prevedourous and Councilmember Ann Kobayashi in 2008, as well as the "HOT Lane" ("High-Occupancy Toll") proposal originally proposed by Dr.

Prevedourous several years ago. In addition to the disadvantages and impacts listed in the Alternatives Analysis, with which I concur, I found several serious problems which I think make a “Managed Lane” facility, whether or not including a major BRT (Bus Rapid Transit) component through urban Honolulu, Waipahu, and ‘Ewa plain, impractical in this application:

- Congestion at the *Ewa* (main entrance during the a.m. peak period) end of the “EZ-Way” would determine that the overall capacity of the facility is too low to meet predicted travel demand.
- Noise impacts from a “Managed Lane” facility would be much greater than the proposed fixed-guideway transit line.
- Grade separation (i.e., “overpasses” and “underpasses”) at “major intersections,” as Kobayashi and Prevedourous proposed, would be costly and impractical.
- Operation of double-articulated Phileas buses is largely impractical on the proposed route, given the amount of conflicting traffic and surrounding land uses.
- Signal interconnection and synchronization would not significantly mitigate the problems with operating BRT on an at-grade alignment.
- Lack of park-and-ride facilities in the Kobayashi/Prevedourous proposal would make the proposed BRT facility much less attractive to riders than the proposed fixed-guideway transit alternative.

As the Alternatives Analysis did not address these issues, presumably because other data was deemed sufficient to support rejection of the Managed Lanes alternative, I am sharing my findings as “new information” that supports the decisions made thus far by the City and County of Honolulu. This research was conducted last year during the campaign for the rail transit charter amendment (i.e., “Amendment 4”), although much of it was not extensively publicized. In anticipation of challenges to the approval of the Final EIS on the grounds that the Managed Lanes alternative was improperly rejected during the Alternatives Analysis stage, I hereby present a summary of my findings, in brief. If you would like to examine my research more closely, I will be happy to supply whatever I can.

Entrance ramp congestion

In his original proposal, expressed in the document he released entitled “Effective Traffic Relief for Oahu: HOT Expressway and Underpasses,” Dr. Prevedourous proposed funneling traffic from four roads: H-1, H-2, Farrington Hwy., and Kamehameha Hwy. (from Mililani) into three HOV/HOT lanes, all merging within scarcely 1,000 feet. Given this short spacing of merge points, I calculate that the actual capacity at this point would be 4,180 PCE (Passenger Car-Equivalent)/hr. at LOS C or 2,890 PCE/hr. at LOS B. At LOS E—the absolute maximum—the capacity would be 6,150 PCE/hr. This table describes conditions at the facility entrance:

	LOS B (60 mph+)	LOS C (approx. 55 mph)	LOS E/F (30 mph to zero)
Buses (PCE)	186	186	186
HOV users	2,444	2,444	2,444
HOT users (%SOV users)	<u>260 (1.2%)</u>	<u>1,550 (6.9%)</u>	<u>3,520 (15.6%)</u>
Total	2,890 PCE/hr. (47% capacity)	4,180 PCE/hr. (68% capacity)	6,150 PCE/hr. (max. capacity)

The capacity of three lanes at LOS E/F would be the same regardless of interchange spacing because traffic would no longer be moving freely. Therefore:

- At the service quality promised by Prevedourous, only 1-7% of all motorists driving alone on H-1 could enjoy the HOT facility—at any price! A true “Lexus Lane.”
- If operated at the speed promised by Prevedourous (“60 mph”), traffic on the HOV/HOT facility would constantly exceed 55 mph, since the maximum LOS C volume at the entrance junction is LOS B volume on the mainline! Therefore, accidents would be frequent and often severe at the terminus, and at sharper curves. While operation at LOS E would be relatively safe, that would erase the speed/time advantage that Prevedourous promises.
- Finally, entry delays to the HOV/HOT facility would consume much of the time advantage of using the facility; delays due to accidents and breakdowns would often erase all time savings.

Although the intermediate exits (in the a.m. direction) that Dr. Prevedourous proposes would help relieve exit-end congestion, they would do nothing to relieve congestion at the entrance to the HOV/HOT facility. Intermediate entrances would only create additional merge points, adding more traffic to a roadway that would regularly operate at high capacity. Finally, these additional ramps would increase the cost of HOV/HOT facility to equal or more than a fixed-guideway transit line.

The “EZ-Way” plan makes the poor design by Dr. Prevedourous impractical. Kobayashi and Prevedourous proposed to allow anyone driving a car with a “33 mpg” or higher fuel efficiency to use the elevated lanes, even if they are the only vehicle occupant. Second, the “EZ-Way” dedicated one lane to guided buses, evidently leaving only two lanes for all carpool, vanpool, single-occupancy vehicle, motorcycle, and non-guided bus traffic. Since the table above shows that a three-lane HOV facility is inadequate for serving travel demand between Pearl City and Downtown, a two-lane HOV/SOV facility is obviously inadvisable.

Relative noise impact

For all that has been said about the noise impacts from rail transit, little information has been made available about the noise impacts from an elevated high-speed roadway. Using Federal Transit Administration methods, the adjacent table shows that any elevated high-speed roadway between Waipahu and Downtown would subject adjacent persons to much more noise than the proposed fixed-guideway transit line. The difference would be especially noticeable where the roadway leaves the H-1 alignment: Along Kamehameha Highway through Pearl City and Aiea, and along Nimitz Highway through Kalihi, Kapalama, and Iwilei.

In addition, peak noise levels (L_{max}) from passing buses would be noticeably louder than the proposed rail transit trains. For example, the peak noise level from an internal-combustion-powered (e.g., diesel-powered) bus passing by at 60 mph is 91 dBA (decibel, A-weighted) at 50 feet. By comparison, the absolute peak noise level from a rail car passing by at 50 mph is only 82 dBA at the same distance. In regards to the experience of a passenger standing next to a bus or train departing a station, the maximum noise level heard by an adjacent pedestrian (i.e., much closer than 50 feet) from a diesel-powered bus has been measured at 84 dBA, while that for a rail transit passenger was only 75 dBA (Gershon, et al. 6).

Although electrically powered buses would be about 10 dBA quieter (Rossa and Staiano 2007)—i.e., about as loud as an electrically-powered rail car—the cost, visual impact, and route-inflexibility of using *two* overhead wires (one for power, the other for ground) all militate toward simply choosing automated light rail trains. Advanced batteries, fuel cells, flywheels, and other exotic alternatives are relatively expensive and untested.

In addition, since electric buses consume more electricity than electric rail vehicles, largely due to the higher friction of rubber tires compared to steel wheels, resorting to electric buses obviates claims that rail transit will require construction of additional electricity generation capacity. However, I have independently confirmed that this is a canard, and the actual peak power demand will be about 18 megawatts, as stated in the Draft EIS.

Moreover, these predicted noise levels neglect the potential for noise mitigation techniques. As you have amply explained elsewhere, noise mitigation for rail transit is considerably more practical and efficient than when trying to shield noise from diesel-powered buses and automobiles.

<u>EZ-Way (2008)</u>	<u>Hourly L_{eq} at 50 feet</u>
93 express buses/hr.	69 dBA
2,474 HOV and SOV veh./hr.	76 dBA
TOTAL:	77 dBA
<u>Original HOT Lane proposal</u>	<u>Hourly L_{eq} at 50 feet</u>
93 express buses/hr.	69 dBA
3,994 HOV and SOV veh./hr.	78 dBA
TOTAL:	79 dBA
<u>Automated Light Rail Transit</u>	<u>Hourly L_{eq} at 50 feet</u>
40 two-car trains/hr.	65 dBA
40 three-car trains/hr.	67 dBA

Trackless Trains in urban and suburban areas.

A “Phileas” double-articulated bus is about 85 feet long (Advanced Public Transport Systems 2008). This is longer than most light-rail vehicles, and comparable to the double-articulated light-rail vehicles built for the Seattle light rail line that is now nearly complete. First, because the tires of a guided bus contact the exact same pavement every time it passes a particular point, the pavement along the entire route must be intensively reinforced, as even the manufacturer of the Phileas system admits (Van der Spek and Splint 33). The cost of reinforcing the pavement will be much higher than the cost of installing permanent magnets or other guidance technology into the roadway.

More important operationally, a Phileas “bus” is a “trackless train,” and its impacts on traffic are approximate to that of a light rail vehicle on at-grade right-of-way. Providing an exclusive bus lane on Farrington Highway and Fort Weaver Road, as proposed in the “EZ-Way” plan, would require removing parking and/or driving lanes from those roads, which would likely raise opposition from local merchants and residents, who would receive relatively little benefit from express buses making infrequent stops. In addition, conflicts with vehicles turning *across* the BRT lanes, or even *stopping* on the lanes to turn into traffic, would be a serious hindrance to transit operations, given that the Alternatives Analysis predicted a need for up to 93 buses per hour in the a.m. peak-hour direction, or one bus every 39 seconds.

At every station stop, a Phileas bus would block off nearly 90 feet of road to any turning vehicle, even if the station platform was much shorter. Whether in suburban areas like Waipahu, or urban areas like Makiki, maintaining access to businesses near a bus stop—most often a corner business—would be difficult or impossible. Providing safe and convenient pedestrian, bicycle, wheelchair, and other access to a mid-street and even mid-block station poses major engineering and security challenges.

In comparison to the proposed fixed-guideway alternative, the “EZ-Way” plan does not mention including any “park-and-ride” facilities. Without park-and-ride lots, the Kobayashi BRT plan is much *less* accessible to local residents than the rail line would be; if every rider must either walk, bicycle, ride a bus, or be dropped off by a motorist at a station, the guided bus is truly a “trackless train.” As explained above, because of their operational requirements, as well as their great length, the Phileas buses can *not* be driven off their prepared route into local neighborhoods.

Lastly, grade-separating intersections, as Kobayashi and Prevedourous proposed, would raise many problems, including:

- Reduced lane width on lanes adjacent to transition points between at-grade and elevated segments, i.e., “ramps.”
- Lost access to streets and driveways by motorists *and* pedestrians at all transition points along ramps.
- Increased noise impacts (probably severe), energy demand, and brake dust emissions at all ramps.
- Significantly increased cost, especially for underpasses, at many locations near the ocean or a stream, e.g., along Nimitz Boulevard.

A Phileas bus is 8.4 feet wide, similar to a conventional transit bus. Besides two feet between the two bus lanes (necessary to prevent the side-mounted rear-view mirrors from

colliding, at minimum), two feet should be provided at the base of the wall for reaction space and a drainage gutter along the conventional driving lanes. Since the width of two retaining walls must be much greater than eight inches each, about three 10-12 foot lanes must be removed or narrowed from the street below wherever the Phileas bus route climbs over an intersecting street. Kobayashi's claim that her solution will have "ZERO" impact on downtown streets (p. 9) is unsupportable.

Furthermore, these ramps will run over 500 feet on either side of the intersecting street. An underpass must drop about 16 feet below grade (a transit bus is 11 feet high); descending at 3% will require 533 feet on either side of the street. Although as steeper grade is feasible—albeit leading to greater noise and other impacts—the Phileas double-articulated design requires that the vertical curve must be limited, so 3% is a good planning figure. Moreover, at least 20 feet of rise must be achieved at overpasses; 667 feet will be required for a 3% grade. Thus allowing for the width of intersecting street being bypassed, the total combination of ramps and bridges will be 1200 to 1500 feet in length.

Signal synchronization

From my experience studying the extensive interconnected signal system in St. Paul, Minnesota for the Minnesota Department of Transportation (Mn/DOT), I have found that signal interconnection works best on one-way streets with minimum turning onto and off the road. Two way roads are only amenable to signal interconnection if cross streets are evenly-spaced.

In comparison to the St. Paul city street system, Honolulu is not a grid or even rectangular. Moreover, all any signal-controlling computer can do is optimize traffic flow. With heavy traffic, especially left-turning traffic and mid-block entries, along with heavy pedestrian traffic, severe congestion will develop.

Conclusion: No at-grade solution will provide sufficiently reliable service to attract as many drivers from their cars as grade-separated rail transit in the Honolulu-Kapolei corridor. Consequently, the Draft EIS should be approved immediately, and the proposed fixed guideway transit system should be constructed as soon as funds and other resources allow.

Sincerely,



Hannah Miyamoto, B.S.C.E., J.D., M.S.

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United States Department of the Interior

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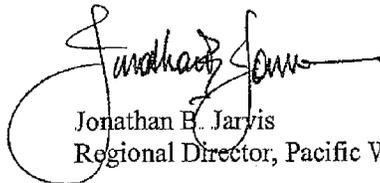
Wayne Y. Yoshida
Director, Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Dear Mr. Yoshida:

Thank you for your letter and Draft Environmental Impact Statement (EIS) to review regarding the City and County of Honolulu's Department of Transportation Services (DTS) proposed Honolulu High-Capacity Transit Corridor Project.

The National Park Service (NPS) supports the concept of a transit system with a primary or alternate route that includes a station with convenient access to Valor in the Pacific National Monument (formerly known as the USS Arizona Memorial) but has some significant concerns and comments. Please see the enclosure for a complete list of NPS comments. The National Park Service looks forward to working with the U. S. Department of Transportation on this important project. If you have any questions please contact Frank Hays at 808-541-2693 extension 723 or email him at Frank_Hays@nps.gov.

Sincerely,



Jonathan E. Jarvis
Regional Director, Pacific West Region

Enclosure

cc:

✓ Ted Matley, Federal Transit Administration, Region IX
Frank Hays, Pacific West Region, Honolulu
Patty Neubacher, Pacific West Region

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AR00058251

REVIEW COMMENTS

DATE: 2/4/09

AGENCY: National Park Service (NPS)

PROJECT: Honolulu High-Capacity Transit Corridor

REVIEWERS: Doug Lentz, Paul DePrey, Frank Hays, Elaine Jackson-Retondo, Melia Lane-Kamahele, Alan Schmierer

No.	Page	Topic	Comment
1.	5-6 thru 5-9	Table 5-2, Historic Properties	Consideration/analysis of the impact to the newly established World War II Valor in the Pacific National Monument (NM), Pearl Harbor (NHL), USS Arizona Memorial (NHL), and USS Bowfin (NHL) is absent throughout this DEIS. Analysis of these resources needs to be incorporated. These resources should also be identified on a map that shows their boundaries and proximity to the elevated transit system.
2.	S-8	Archaeological, Cultural, and Historic Resources, paragraph 5 and 6.	It states that up to 61 historic resources for the project could be affected (moved/damaged/destroyed). "Appropriate mitigation measures are discussed in the following Construction Effects section." Mitigation measures are not discussed in the Construction Effects section.
3.	S-9	Cost and Financial Analysis	The Pearl Harbor Historic Sites (USS Bowfin Submarine Museum and Park, Pacific Aviation Museum, Battleship Missouri Memorial, and World War II Valor in the Pacific National Monument, formally USS Arizona Memorial) receive over 1.5 million visitors a year, one of the most visited destinations in the Pacific. All visitors access the Pearl Harbor Historic Sites through World War II Valor in the Pacific National Monument. The National Park Service (NPS) supports either an alternative that includes the Airport Alternative with a stop in reasonable proximity to the NM or a public transportation option that transports visitors from the Salt Lake Alternative (Salt Lake Station) to the NM.
4.	2-19	Airport Alternative	This alternative states "Stations would be constructed at Aloha Stadium, Pearl Harbor Naval Base, Honolulu International Airport, and Lagoon Drive." However, all maps that pertain to this area, and other locations in the DEIS, identify a station at the NM, formally USS Arizona Memorial . See comment 3.

5.	3-29	Figure 3-10	If both the Salt Lake and Airport alternatives are implemented consider consolidating the two Aloha Stadium stations.
6.	3-44	3.4.5. Mitigation of Long-term Transportation Effects Traffic	The NPS is concerned about commuter parking at the NM station. There is currently not enough parking for visitors to the NM. Please include the Pearl Harbor Historic Sites (Pacific Aviation Museum, USS Bowfin Submarine Museum and Park, Battleship Missouri Memorial, and World War II Valor in the Pacific National Monument) in discussions about the NM station location.
7.	3-45 3-48	3.5 Construction-related Effects on Transportation Table 3-26 3.5.7 Mitigation of Construction-related Effects	There is only one road from King Kamehameha Highway that accesses the Pearl Harbor Historic Sites, Arizona Memorial Place. The DEIS does not address this cross street in the narrative or on table 3-26. The Maintenance of Traffic Plan needs to plan for the traffic issues at this intersection prior to construction. The Pearl Harbor Historic Sites are a destination for over 4,000 visitors a day. Please work with the Pearl Harbor Historic Sites to plan for vehicular access for employees and visitors.
8.	4-31	Figure 4-11 Community Resources and Facilities within One-half Mile, Aloha Stadium to Kalihi	Identify World War II Valor in the Pacific National Monument, formally USS Arizona Memorial, and USS Bowfin Submarine Museum and Park as parks or recreation facilities within one-half mile of the transit system.
9.	4-36	Table 4-7 (property acquisition)	The Pearl Harbor Historic Sites are not listed in the table of community facilities and services that will be affected.

	4-36	and Airport Alternative	The DEIS proposes a station at World War II Valor in the Pacific National Monument, formally USS Arizona Memorial. The NPS has concerns with a station at this proposed location. Please include the Pearl Harbor Historic Sites (Pacific Aviation Museum, USS Bowfin Submarine Museum and Park, Battleship Missouri Memorial, and World War II Valor in the Pacific National Monument) in discussions about the NM station location.
10.	4-37	Parklands and Recreation Facilities	The DEIS does not acknowledge, or address the effects of, acquisition of property at the NM but it does show the footprint of a station on the commercial parking lot. There will be a major effect on World War II Valor in the Pacific National Monument if a station is located on half of the commercial bus parking lot. This will need further discussion and involvement with the NPS.
11.	4-40 4-41	Affected Environment Neighborhoods Aiea	This section looks at neighborhoods adjacent to the project and the anticipated effects. The Pearl Harbor Historic Sites attract over 1.5 million visitors to Pearl Harbor every year and are located in the Aiea neighborhood but are not considered in the DEIS.
12.	4-59	Visually Sensitive Resources Kalihi to Ala Moana Center Landscape Unit	The DEIS identifies "Pearl Harbor (East Loch)" in the wrong section. Pearl Harbor is located in the two prior sections, Aloha Stadium to Kalihi and Fort Weaver Road to Aloha Stadium.
13.	4-65 to 84	Viewpoints	The before and after pictures are extremely helpful. A before and after viewshed analysis from the USS Arizona Memorial, the USS Bowfin and from other Ford Island sites looking toward the proposed railway (mauka) should be completed. Consult with NPS and US Navy historians to identify and take actions to preserve or mitigate impacts to historic viewsheds.

14.	4-100	4.9.3 Environmental Consequences and Mitigation	Include the noise model that was used to project noise levels. It should include the noise level 100 yards away from the raised rail line. No noise projections or estimates were done between Aloha Stadium and Hickam Air Force Base and need to be. Noise projections range up to 75 dBA. That is too loud for quiet contemplation or interpretive talks.
15.	4-108	4.10.2 Electric and Magnetic Fields	The maintenance facility at the NM is within the 200 feet of the transit rail line and has not been evaluated for electric and magnetic concerns.
16.	4-125	4.12.3 Environmental Consequences and Mitigation	All night lighting should be down lighting to reduce light pollution of night skies and to protect an endangered bird species.
17.	4-142	4.15.1 Section 106	The NPS should be on this list to review.
18.	4-168	4.18.2 Indirect Effects Airport Alternative	In the DEIS the Arizona Memorial Station and Aloha Stadium Station were left out of this section, both of which are within the Pearl Harbor NHL. Therefore, there are three stations within the NHL and the cumulative impact of that should be evaluated.
19.	4-169	4.18.3 Cumulative Effects	See comment 18.
20.	5-2,3	De Minimis Impacts	At this time, the NPS does not concur with a <i>de minimis</i> finding in regards to impacts of the project on the Pearl Harbor, USS Arizona Memorial, and USS Bowfin NHLs.
21.	5-4	Table 5-1 Publicly Owned Parks and Rec. Areas Adjacent to Project Alignment	The World War II Valor in the Pacific National Monument, formerly USS Arizona Memorial, is publicly owned and adjacent and should be included here.
22.	5-5	5.4 Direct Use of Section 4(f) Properties 5.4.1 Park and Rec. Resources	Please include the Pearl Harbor Historic Sites (Pacific Aviation Museum, USS Bowfin Submarine Museum and Park, Battleship Missouri Memorial, and World War II Valor in the Pacific National Monument, formally USS Arizona Memorial) in discussions about the NM station location
23.	5-34	5.5.2 Parks and Rec. Resources	The NM should fall into Section 4(f) consideration.