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Gentlemen:

Comments on the June 2010 Final Environmental Impact Statement (Final EIS)

The following are our comments on the Final EIS and the City's response to us regarding our Draft EIS comments of February 6, 2009. The City's response is included in the Final EIS, Appendix A, signed by Director Yoshioka, and dated June 11, 2010. This letter will be referred to as "City Response."

We detailed our objections to the biased way that the City and Parsons Brinckerhoff evaluated the Managed Lane Alternative (MLA) in Part I of our Draft EIS comments to the FTA on February 6, 2009. These comments remain valid for the Final EIS since the City has yet to "rigorously analyze" the issues we raised in our comments.

The MLA was not "fully evaluated" since the City failed to consider the improvements suggested by the City Transit Task Force in 2006. In particular, it ignored the suggestions of the Task Force regarding the zipper lane.

The Task Force Final Report made 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."*[1]

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 since it produced the list of suggested modifications attached to the report as Appendix 3.[2] From this it is obvious that Mr. Glater expected 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 and the Final EIS any mention of the Task Force, or its Final Report, or the highly relevant questions it posed.

We believe this 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.*[3]

Our principle concerns about the rejection of the MLA were, and remain, as follows:

Removal of zipper lane

First, the City Response gave no reasonable explanation as to why the City removed the zipper lane in the Managed Lane Alternative (MLA). They wrote,

> *Zipper lane: As discussed in the Chapter 5, Alternative 3b of the Detailed Definition of Alternatives Report (2006), the reversible lane Managed Lane Alternative provides three managed/HOV lanes in the peak direction, which is sufficient to satisfy the demand for restricted lanes. Eliminating the zipper lane frees up two off-peak direction lanes, one HOV and one general purpose lane. In other words, it was not needed to accommodate the demand in the eastbound direction. (City Response, p. 9).*

The City's contention that, "… three managed/HOV lanes in the peak direction is sufficient to satisfy the demand for restricted lanes" is nonsense since demand is a function of price, and Managed Lane toll prices were to be varied to control demand.

If demand threatened to decline, the toll price was to be dynamically reduced, to zero if necessary, to maintain demand. It is ridiculous to posit that, at the height of the rush hour, there could be insufficient demand on the H-1 with a zero toll price.

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[1] www.honolulutraffic.com/TaskForceReport.pdf p. 4/7.

[2] www.honolulutraffic.com/TaskForceReport.pdf pp. A-32 to A-33. Appendix 3 also attached as our Appendix B.

[3] 40CFR1502.15

MLA construction cost estimate

The City Response to our concerns about their MLA cost projections, especially when compared to H-3, was as follows,

> *If construction of the H-3 Freeway had begun in 2006, that project would have cost approximately $2.6 billion.* (City Response, p. 10.)

We agree; that amount is the same as the projected cost of the Managed Lanes Alternative. However, H-3 consists of four lanes while the MLA is only two lanes wide. Therefore, the cost per lane mile is twice as much for the MLA as the H-3. The City Response added,

> *In addition, both the H-3 Freeway and the Managed Lane Alternative face unique situations that affect cost estimates. Construction of the Managed Lane Alternative would have occurred in a heavily developed corridor. As a result, there would be substantial disruptions to traffic and utilities, both of which add to the time, and thus cost, of a project. The H-3 Freeway was built in an undeveloped part of the island and while it had its own challenges, expensive traffic and utility disruptions were minimal.*

This is not necessarily so. The Tampa Expressway is remarkably similar to the MLA in that much of the route was planned to use the median of Nimitz and Kamehameha Highways. The Tampa Expressway was built with a minimum disruption because of the construction methodology employed.

The City has not made a credible scientific argument as to how their $2.6 billion estimate for the Managed Lanes construction cost squares with that amount being twice as much per lane mile as the H-3 freeway, currently the nation's most expensive highway. The real cost should be less than $1 billion, which would still be more than twice as much as current costs in Florida.

Inflated operating costs

The City Response did not address our concerns of their inflated operating costs caused by projecting a 50 percent increase in buses over those projected for the No-Build Alternative while only projecting a 5 percent increase in riders over the No-Build.

They made no attempt to justify that 5,400 park-and-ride stalls for the Managed Lane Alternative, with their attendant costs, was at all necessary.

They did not attempt to provide facilities to reduce traffic congestion at the downtown terminus of the Managed Lane Alternative.

Summary of MLA criticism

Had the City used reasonable cost estimates and reinstated the zipper lane it is quite clear that the MLA would have outperformed the heavy rail line.

Insufficient consideration of Section 4(f) and Section 106

In evaluating alternatives one of the more important legal requirements is the avoidance of historic properties, including burial grounds. The Section 4(f) statute requires transportation

projects to be evaluated at the alternatives analysis stage with an injunction to avoid historical properties if at all possible.

The following are two excerpts from the Section 106 legislation concerning the evaluation of alternatives:

> *"The agency official shall ensure that the section 106 process is initiated early in the undertaking's planning, so that a broad range of alternatives may be considered during the planning process for the undertaking." Section 106, § 800.1(c)*

> *"Consulting party roles. Indian tribes and Native Hawaiian organizations, other consulting parties, and organizations and individuals who may be concerned with the possible effects of an agency action on historic properties should be prepared to consult with agencies early in the NEPA process, when the purpose of and need for the proposed action as well as the widest possible range of alternatives are under consideration." Section 106 § 800.8(a) (2)*

Section 106 calls for alternatives to be studied for their effects on historic properties in the early stages of planning before the alignment is chosen (See Section 106, § 800.1(c) above).

Yet the alignment chosen by the City and FTA was evaluated in the Alternatives Screening Memo as,

> "… this elevated alignment would have sev*ere visual impacts for Aloha Tower and should be avoided if there are other viable alternatives."*

And the Alternatives Analysis (p. S-3) stated that,

> *"*Compared to the other alternatives [No-Build and MLA], the Fixed Guideway Alternative would require more acquisitions an*d affect more potentially historic structures …"*

Since recommendations for significant improvements to the Managed Lane Alternative had been made by the City Council's Transit Advisory Task Force (Task Force) one would think that such improvements would have been developed, evaluated and then compared with other alternatives both as to transportation outcomes and impacts on historic properties during this Alternatives Analysis phase.

Instead, the City dismissed the Managed Lane Alternative without testing the improvements suggested by the Task Force and then called for a new Scoping without including the Managed Lane Alternative or giving any reason for its dismissal. And this occurred despite the Scoping being complete and the requirement that,

> *Draft environmental impact statements shall be prepared in accordance with the scope decided upon in the scoping process. [§1502.9 (a)]*

As the EPA commented in February 2009 in its letter to the FTA, "… 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." Source: Draft EIS comments

We need an honest answer as to why the Managed Lane Alternative was not developed further and then studied in the Draft EIS.

Coordination of 106 and 4(f)

The 4(f) process appears to have been completed with little or no input from the "*officials with jurisdiction.*" For example, the potential use of land from Section 4(f) properties was not evaluated during the Alternatives Analysis stage. The closest evaluation of historic properties was the Alternatives Screening Memo issued at the time of the Alternatives Analysis. The Memo does not mention section 4(f) or its requirements to avoid 4(f) properties.

Had the Section 4(f) process been followed as required by statute, then a different alternative might well have been chosen that would have avoided the historic downtown area altogether.

> *§ 800.3 (b) "Coordinate with other reviews. The agency official should coordinate the steps of the section 106 process, as appropriate, with the overall planning schedule for the undertaking and with any reviews required under other authorities such as the National Environmental Policy Act ... such as section 4(f) of the Department of Transportation Act."*
>
> *"It is important to point out that the standard for evaluating alternatives under NEPA and the standard for evaluating alternatives under Section 4(f) are different. In general, under NEPA, FHWA can advance to detailed study any reasonable alternative, among a range of alternatives, as long as there is sufficient information that shows a well-reasoned decision to include that alternative. However, under Section 4(f), if there is a feasible and prudent alternative that avoids the use of a 4(f) resource, among alternatives that use a 4(f) resource, the alternative that must be selected is the one that avoids the 4(f) resource ... Therefore, it is possible for an alternative that was examined but dismissed during the preliminary NEPA alternative screening process to still be a feasible and prudent avoidance alternative under Section 4(f). In other words, there is more room to reject alternatives as unreasonable under NEPA than there is to find those same alternatives are imprudent under Section 4(f)." FHWA Policy Paper, p. 5. (original emphasis).*
>
> *"The agency official shall consult with the SHPO/THPO and other consulting parties, including Indian tribes and Native Hawaiian organizations, to develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize or mitigate adverse effects on historic properties." § 800.6 (a)*
>
> *During the Alternatives Analysis process, alternative corridors and modal alternatives were considered to identify transportation solutions to meet the Project's Purpose and Need. No alternative was identified that would completely avoid Section 4(f) properties while meeting the Project's Purpose and Need. (FEIS, 5-5).*

Why did the FTA official not coordinate the section 106 process with the reviews required by section 4(f) and thus avoid impacting historic properties?

Scoping "gamed" to eliminate MLA.

The City and PB have tried everything in an attempt to prove that the reason for the second Notice of Intent and second Scoping was legitimate and not merely a subterfuge to eliminate the Managed Lane Alternative.

The City Response to our comments on the DEIS, page 4, discusses the legitimacy of a second scoping process, citing both an FTA 2006 Guidance and the 2006 SAFETEA-LU Environmental Review Process Final Guidance. We can find no discussion in these documents about a second Scoping, let alone a justification for dismissing a previously successfully scoped alternative.

Further, the Final EIS states that,

> *"The City Council eliminated the Managed Lane Alternative from consideration when it selected the Locally Preferred Alternative on December 22, 2006."*
> *http://www.honolulutraffic.com/Bill79Final.pdf*

This is not correct. At the time of the LPA vote, the City Council understood that, according to the then current Notice of Intent, Scoping Notice and Scoping Report, the Managed Lane Alternative would be studied in the Draft EIS. Only later, with the unexpected issuance of a second Notice of Intent and Scoping Notice was anyone aware that the MLA had been eliminated.

In any case the choice of a Locally Preferred Alternative by itself does not eliminate other worthy alternatives from continuing to be studied.

The statute is clear that, "until an agency issues a record of decision … no action concerning the proposal shall be taken which would … limit the choice of reasonable alternatives." (§1506.1(a).

> *Even after the completion of scoping and a preliminary analysis of alternatives, the USDOT lead agency may decide that identification of a preferred alternative is premature because there is not yet sufficient information on the alternatives to support the decision. For example, the USDOT lead agency may not be convinced, on the basis of only preliminary information, that a Section 4(f) determination will be possible for the non-Federal lead agency's preferred alternative. [Question 43,Section 6002 Final Guidance].*

The full LPA should be studied in the Final 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.*[4]

[4] 40CFR1502.4[a]

> *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.*

As stated in Bill 79 (2006)[5] 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 Final 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.*[6]

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*

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[5] http://www.honolulutraffic.com/Bill79Final.pdf

[6] Corps of Engineers comments, Second Scoping, App. A-1, p. A-6, at: www.honolulutraffic.com/NEPAScopingReport.pdf

> *distributed among all the activities in the project at a level funding ratio equal to the 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.*[7]

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.

The lack of any credible rationale in the Final 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.*[8]

Revised population projections should be used.

> *In 2000, 63 percent of O'ahu's population of 876,200 and 80 percent of its 501,100 jobs were located within the study corridor. By 2030, these distributions will increase to 69 percent of the population and 83 percent of the employment as development continues to be concentrated into the PUC and 'Ewa Development Plan areas. These trends are shown in Figures 1 -5 and 1 -6, which illustrate existing and year 2030 projected population of 1,117,200 and employment of 632,700, respectively, by transportation analysis area.* (FEIS, 1-6.)

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[7] http://www.fta.dot.gov/funding/thirdpartyprocurement/bppm/grants_financing_6105.html

[8] 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).

However, while the state reduced its population forecast in August, 2008, (see table below) for Honolulu in 2030 to be 1,017,565, a reduction of ten percent from its earlier forecast, the City continues to use the state's earlier forecast as detailed above.

Table A-13. Honolulu County Total Resident Population by 5-year Age Group, 1980-2035								
Age group (years)	2005	2010	2015	2020	2025	2030	Change 2005-2030	Age Group Change
0 - 4	60,972	61,593	62,456	62,475	61,973	62,118	1,146	Ages 0-19
5 - 9	52,484	54,928	60,941	61,810	61,807	61,280	8,796	
10 - 14	56,621	47,272	52,109	58,125	58,975	58,953	2,332	14,399
15 - 19	56,995	56,439	47,451	52,287	58,285	59,120	2,125	
20 - 24	70,385	69,455	69,830	60,850	65,655	71,616	1,231	Ages 20-64
25 - 29	63,538	65,177	67,222	67,596	58,610	63,368	-170	
30 - 34	63,600	59,930	64,153	66,213	66,570	57,589	-6,011	
35 - 39	63,979	61,373	60,025	64,244	66,289	66,636	2,657	
40 - 44	65,597	59,543	57,618	56,311	60,511	62,550	-3,047	-3,316
45 - 49	63,512	60,870	56,925	55,049	53,778	57,957	-5,555	
50 - 54	59,393	61,227	59,723	55,890	54,072	52,849	-6,544	
55 - 59	54,345	57,607	60,851	59,455	55,742	53,998	-347	
60 - 64	40,560	51,273	56,534	59,811	58,560	55,029	14,469	
65 - 69	31,541	38,708	49,564	54,749	58,045	56,998	25,457	Ages 65+
70 - 74	29,201	30,196	36,652	46,927	51,972	55,260	26,059	
75 - 79	27,573	26,496	27,135	33,139	42,629	47,470	19,897	106,810
80 - 84	21,297	23,635	22,290	23,046	28,419	36,827	15,530	
85 +	18,080	26,112	30,346	31,486	32,718	37,947	19,867	
Total	899,673	911,833	941,824	969,462	994,610	1,017,565	117,892	117,892
Source:	http://hawaii.gov/dbedt/info/economic/data_reports/2035LongRangeSeries							

In addition, we find no reference in the Final EIS to the dramatic change in the composition of Age Groups. The Age Groups of 20 through 64, that constitute those of the working ages, are showing a decline. The Final EIS should reconcile these data with those showing significant increases in the working population through 2030 in the Final EIS, Table 4-3

"Environmentally preferable alternative"

Above all what most puzzles us is how a noisy elevated rail line, 40 feet high and 30 feet wide, traversing the most historically sensitive part of Honolulu's waterfront area, and thus opposed by every one of Hawaii's environmental organizations, can be approved as "the alternative or alternatives which were considered to be environmentally preferable." How this can happen?

The following two statements in the Final EIS, taken together make a mockery of the NEPA process. The first statement is that,

> *While the Project will be environmentally preferable regarding effects on air quality, energy use, and water quality, the No Build Alternative is the environmentally preferable alternative based on overall consideration of the criteria listed in 40 CFR 1505.2(b). The No Build Alternative would affect fewer historic and cultural resources and waters of the U.S., have no visual impact, and cause no displacements. However, the No Build Alternative does not meet the Purpose and Need for the Project. [FEIS, 4-3.]*

The second statement is that,

> *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 Mānoa, as specified in the ORTP (O'ahuMPO 2007).* [FEIS, 1-21].[9]

In short, although the No-Build Alternative (and, by inference, the Managed Lane Alternative) are "environmentally preferable" they are not eligible as they are not "rapid transit," which FTA defines as heavy rail. So no matter how environmentally preferable a project, if it is not "rapid transit" it will not be preferable?

However, that is not consistent with NEPA. To be,

> *"Consistent with NEPA, the purpose and need statement should be a statement of a transportation problem, not a specific solution. However, the purpose and need statement should be specific enough to generate alternatives that may potentially yield real solutions to the problem at-hand. A purpose and need statement that yields only one alternative may indicate a purpose and need that is too narrowly defined."*[23 CFR § 450.336].

Final EIS distorts public support

The City selectively takes results from official surveys in an attempt to show that O'ahu residents overwhelmingly prefer rail transit to highway improvements. Here is an excerpt from the Final EIS,

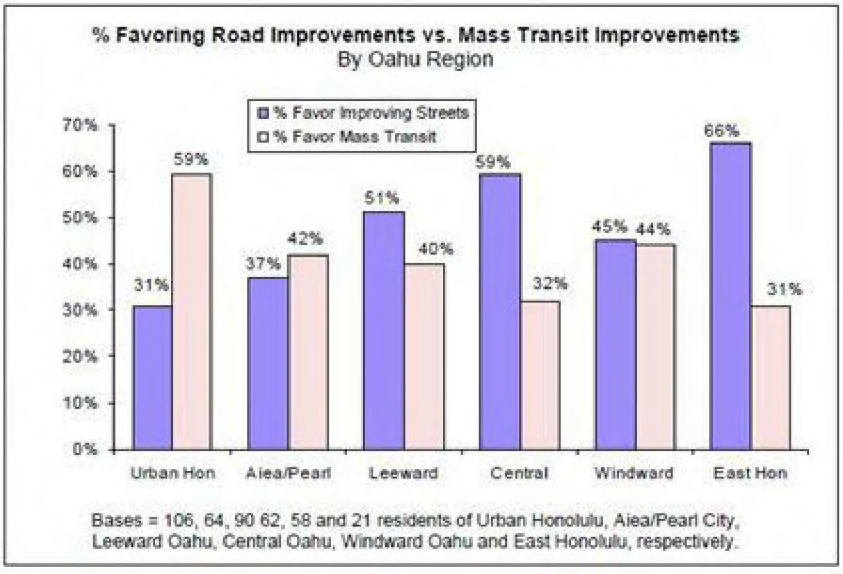
> *As part of its work to update the Regional Transportation Plan to the* O'ahu Regional Transportation Plan 2030 *(ORTP), the O'ahu Metropolitan Planning Organization (O'ahuMPO) surveyed O'ahu residents about transportation issues in 2004. The survey results identified traffic congestion during the commute period in the study corridor extending from 'Ewa and Central O'ahu to Downtown Honolulu as the biggest concern. By nearly a two-to-one margin, 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. (FEIS, p. 1-3.)*

The reader would never guess that the Final EIS excerpt above was describing the same 2004 OMPO survey results below.

[9] "The proposed rail transit system from Kapolei to Manoa/Waikiki will become the backbone of the transit system, connecting major employment and residential centers to each other and to downtown Honolulu." (ORTP 2030 p. 5.)

But Leeward and Central Oahu residents endorsed road solutions over mass transit usage by margins of 51% to 40%, and 59% to 32%, respectively.

East Honolulu residents were the strongest supporters of altering traffic flow, favoring it over the mass transit/carpool approach, 66% to 31%.



[2] Differences based on area of residence were found to be statistically significant at the $p \leq .05$ level, based on tests of statistical significance.

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While the rail transit line is supposedly to benefit Central and Leeward O'ahu, these folks clearly preferred road related solutions.

The Final EIS does not mention the later 2006 OMPO survey, an excerpt from which is shown below, and this is not surprising since it revealed a highly favorable attitude on the part of the public to HOT lanes.

V. REACTION TO HIGH OCCUPANCY TOLL (HOT) LANES

Initial reaction to High Occupancy Toll or 'HOT' Lanes was very positive, overall, based on responses to the following series.

"Would you support construction of an elevated high-occupancy highway for carpools, vanpools and buses from Ewa to downtown along parts of Kamehameha Highway and H-1?"

"If such a project were constructed, would you support making it a high-occupancy toll facility, called a 'HOT' facility? This facility would allow solo drivers to use it if they pay a toll and if the lanes are not fully utilized by high-occupancy vehicles?"

"Would you support construction of such a project if the tolls generated were not sufficient to cover the cost and it would require increased taxes?"

From responses, two-thirds of island-wide residents would reportedly back construction of HOT Lanes along parts of Kamehameha Highway and the H-1.

- **69%** said 'yes' to supporting construction of HOT lanes in the specified location.
- **67%** said 'yes' to making it a high-occupancy toll facility, as described above.

Energy savings from rail are highly doubtful

There is nothing shown in the Final EIS to justify the statement that, "The Project will reduce daily transportation energy demand by 3 percent." (FEIS, Table 4-1).

Since the typical rail transit line shows no energy savings over the average automobile, according to the U.S. Department of Energy, and the Honolulu rail project will be highly directional, it is unlikely that the Honolulu rail project will show energy savings over automobile use.

A complete rebuttal to the City's position on operating energy savings may be found at the following link: http://www.honolulutraffic.com/HNL_rail_energy_use.pdf

As to construction energy use, one has only to use the City's own data to confirm that there will be little energy savings from this rail project.

Table 4-21 of the FEIS projects daily savings of 2,440 million British thermal units (MBTUs) of energy each day for the rail project over the No-Build. However, page 4-206 says the project construction will have energy costs of 7,480,000 MBTUs. This means that it will take ten years of operation to pay back the energy used in rail's construction. And this will only happen if the City is able to show, which it has not done so far, that these savings will actually result from operation.

Summary:

The Final EIS does not show, in anything like the level of detail required by statute, a rationale for dismissing the Managed Lane Alternative from the Alternatives Analysis.

A more reasonable construction cost projection, a reduction in the number of buses forecast, elimination of most park and ride spaces and, most importantly, the restoration of the zipper lane, would show that the MLA outperforms the fixed guideway rail system both operationally and in its ability to avoid historic properties and native Hawaiian burial places.

Sincerely,
HONOLULUTRAFFIC.COM

Cliff Slater, Chair