

29 December, 2008

To:

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Subject: Comment on Draft Environmental Impact Statement (DEIS) “Honolulu High-capacity transit corridor Project”, Issue : **The purpose and goals for the Honolulu High-capacity Transit Corridor Project Draft Environmental Impact Statement (DEIS) 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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