

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 : 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,

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