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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