1992-07-09-REIS-HONOLULU RAPID TRANSIT PROGRAM

FILE COPY

HONOLULU RAPID TRANSIT PROGRAM

FINAL
ENVIRONMENTAL IMPACT STATEMENT

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION

and

CITY AND COUNTY OF HONOLULU
DEPARTMENT OF TRANSPORTATION SERVICES
Frank F. Fasi, Mayor

PUBLIC AND AGENCY COMMENTS

APPENDIX C

July 1992
HONOLULU RAPID TRANSIT PROGRAM

FINAL
ENVIRONMENTAL IMPACT STATEMENT

PUBLIC AND AGENCY COMMENTS

COMPILATION OF AA/DEIS AND SDEIS LETTERS

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   General Services Administration

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   Hawaii Community Development Authority
   House of Representatives, The Honorable Wayne Metcalf
   Office of Environmental Quality Control
   Office of State Planning and Department of Transportation
   University of Hawaii, Leeward Community College
   University of Hawaii at Manoa, Environmental Center
   Waikiki Convention Center Authority

3.0 CITY AND COUNTY OF HONOLULU

   Aliamanu - Salt Lake - Foster Village Neighborhood Board No. 18
   Board of Water Supply
   Building Department
   City Council, Leih-Wai Doo
   City Council, Gary Gill
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   Department of General Planning
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3.0 CITY AND COUNTY OF HONOLULU (CONTINUED)

Department of Land Utilization
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Downtown Neighborhood Board No. 13
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4.0 OTHER LOCAL GOVERNMENTAL AGENCIES

Oahu Metropolitan Planning Organization, Citizen Advisory Committee

5.0 COMMUNITY, CIVIC AND BUSINESS ASSOCIATIONS

The American Institute of Architects
Building Industry Association of Hawaii
The Chamber of Commerce of Hawaii
Committee on Sensible Transit (2)
Downtown Improvement Association
Foster Village Community Association
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6.0 BUSINESSES

Charley's Taxi (2)
Corporate Concepts
Grant Thornton
Hawaii Pacific Engineers, Inc.
Hawaiian Dredging & Construction Company
Hawaiian Electric Company, Inc.
Hilton Hotels Corporation
Honolulu Transit Corporation
J.B. Havre Securities, Inc.
6.0 BUSINESSES (CONTINUED)

Longevity International Enterprises Corporation
Milliani Town, Inc.
Milliani Paratransit Services
Outrigger Hotels Hawaii
Pacific Construction Co., Ltd.
Reynolds and Shidler
TGI (Bombardier)

7.0 PRIVATE CITIZENS

Adelstein, Bill
Anderson, Larry
Andrews, Al
Apel, Emily
Baldori, Rene M.
Beistle, Mr. and Mrs. F.F.
Bell, Mary S.
Benitez, Delesrita C.
Bermundo, Maria
Bird, Marlene
Bongartz, T.R.
Boyette, Ruth A.
Brown, Ralph E.
Burchett, Klaylan
Buysent, John C., Jr.
Cabrinha, Joseph W.
Cadwell, Terry
Cadwell, Sherry
Callan, Dennis
Campbell, Cheryl
Canencia, Emilo
Carrera, Allyn
Chock, Daniel
Choy, Eisle K.
Chun, Anneliese
Cimmins, Gayle
Colby, Maureen
Cole, Charles D.
Costa, Lisa
Costa, W.
Costes, Buddy
Cristobal, Alipio A.
Curran, Winifred
Dauk, Michael
DeMello, Karen
DeMello, Robert
DeNeeve, Fay
Denton, Bernard T. (Jack)
Doane, Kurt
Dowdy, Bert and Gale
7.0 PRIVATE CITIZENS (CONTINUED)

Espeno, Cathy
Ferguson, Thomas and Doris B.
Flannelly, Kevin J., Ph.D.
Francisco, Paul S.
Franke, Paul C.
Gasper, Mary (2)
Gately, D.E.
Gilkerson, Orville
Goodhue, Stratford
Grace, Frederick K.
Graham, Roderick
Halles, George V.
Hamilton, Scott
Ho, Alex
Hong, Christopher G. and Audrey L.
Hughes, John H.
Ishida, Keith I.
Iversen, Steven R.
Izumoto, Audrey C.
Jagielski, Patricia A.
Johnson, Vicky E.
Kaukoole, Jerry
Kam, Alexander (and others)
Kawelo, Janet
Kekuna, George L., Jr.
Kemp, Willard D.
Kemp, Florence L.
Kiczek, Michael G. and Judith T.
Kililau, Robert A.
Kim, Jerry
Kimura, Denise
Koehler, Phil and Pam
Koshi, Jim
Kuntz, Barbara K.
Lamberth, Larry E.
Lavender, Mrs. Dorothy R. and Louis (and others)
LeRoux, Jim S. and Pat
Lim, Ron
Limpahan, Ellery K.
Manning, Janie B.
Manuel, Gimo M.
Marsh, Cliff
McKay, Arapata
Medeiros, Pat
Miller, Anne
Monaco, Joseph
Morikawa, Clifford
Mun, Kendrick
Mun, Ronald
Murata, Patrick H.
Nakama, Lyn
7.0 PRIVATE CITIZENS (CONTINUED)

Neighborhood Board 18 Resident
Nalbach, Francis A.
Nixon, Philip
Nouchi, Mitsue
Numazu, Jerry
Odnall, Rob
Olson, Richard E. and Tamiko
Ono, Mark T.
Ozawa, Hanako
Parales, Rosa S.
Park, Mrs. Elaine
Patton, Rossi Peralta
Pechauer, Janice W.
Peralta, Ronalyn B.
Perry, Sherry
Pollock, Richard
Purnell, J. Stephen
Racoma-Lee, Martha
Ramos, Sandra
Rodalfich, Patricia
Ross, Mrs. Alice
Ruby, Ann
Schieve, Robert B.
Schlapak, Helen
Slayter, Mrs. Lois
Sprague, Kenneth E.
Stabley, Stewart and Nancy
Stewart, Edward A.
Streck, Alfred T., Sr.
Strona, Joseph
Sult, Cecil R.
Taibbi, R.V.
Taira, Masa M.
Takara, Jane
Takata, Thomas and Shirley
Tamashiro, George T., P.E.
Tanaka, Ronald M.
Tanigawa, Helen
Tanouye, Leanne M.
Tsuzuki, Clarence
Vines, Thomas E. (and others)
Vogland, Bob
Volberding, Patricia M. and Ted E.
Watanabe, Wallace
Welhouse, David J.
Wright, E. Alvey
Yamamoto, Ronald
Yohe, Sioux
Young, Judd M.
Young, Ronald A.
1.0 UNITED STATES GOVERNMENTAL AGENCIES
Mr. Benjamin B. Lee  
Chief Planning Officer  
Department of General Planning  
City and County of Honolulu  
650 South King Street  
Honolulu, Hawaii 96813  

Dear Mr. Lee:

Thank you for the opportunity to review the Alternatives Analysis/Draft Environmental Impact Statement (DEIS) for the Honolulu Rapid Transit Development Project, Honolulu, Hawaii. The comments of Operations Branch (now Operations Division) concerning Department of the Army permits (letters dated May 26, 1989 and July 19, 1989) have been incorporated into the DEIS. Our only additional comment is that the discussion of flood zones on page 3-39 of the DEIS is correct.

Sincerely,

C. Fung  
Assistant Director of Engineering
May 23, 1990

Mr. Benjamin B. Lee, Chief Planning Officer
Department of General Planning
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Lee:


Thank you for the opportunity to comment on the proposed action that will provide a fixed guideway system from Waiau through downtown Honolulu and beyond to the University of Hawaii at Manoa. Our comments follow:

1. We believe that the subway alignment under Hotel Street through downtown would be superior to above grade alignments in terms of noise and visual impacts, particularly in the Chinatown area.

2. The need to extend the system into Waikiki is questioned in view of the visual intrusion of the guideway system above grade, the cost-effectiveness in providing an increased level of service to the area; and the additional front-end cost and inconvenience caused by construction.

3. After decisions have been made on the selection of the system and alignment, further in-depth studies should be made of historic properties and park areas to minimize the system's impact on these resources.

4. None of the alternative alignments have any serious adverse impacts on HUD-assisted projects or programs.

We would appreciate receiving a copy of the Final EIS. If you have any questions, you may call Frank Johnson at (808) 541-1327.

Very sincerely yours,

Calvin Lew
Director
Community Planning and
Development Division

cc: A. Sappal

U.S. Department of Housing and Urban Development
Honolulu Office, Region IX
300 Ala Moana Blvd., Room 3318, Box 50007
Honolulu, Hawaii 96850-4991

90-180
May 21, 1990

Mr. Benjamin B. Lee
Chief Planning Officer
Department of General Planning
City and County of Honolulu
650 South King St., 8th Floor
Honolulu, Hawaii 96813

Dear Mr. Lee:

The Hawaii District, Water Resources Division, U.S. Geological Survey (USGS) has reviewed the Alternatives Analysis/Draft Environmental Impact Statement for the Honolulu Rapid Transit Development Project and offer the following comments:

Section 5.13.4.2 Groundwater: The dewatering of a large excavation such as would be needed for the proposed subsurface alignment present problems that should be adequately addressed. Problems associated with the recent large scale dewatering in Waikiki is a case in point. If in the dewatering process, significant amounts of sand and silt are removed with the water, the potential for differential settlement within or adjacent to the dewatered area may be increased. We would suggest that prior to the actual construction, dewatering pump tests be conducted to estimate aquifer characteristics which can be used to estimate the area of influence of a dewatering sump, given various rates of pumping. While conducting the pumping tests, an estimate of suspended material in the water may be made while pumping at varied rates.

We support the concept of recharging the groundwater outside the excavation site as stated on page 5-96, and believe that this method may minimize the effects of dewatering.

Section 5.13.4.1 Water Quality: In addition to sediment entrained in the water pumped from the excavation there may be other contaminants encountered. If this is the case, the contaminants should be removed prior to discharging the water from the excavation if they are judged to have a significant impact on the receiving water bodies.

We believe that some discussion on the monitoring needs to gauge the short and long term impacts of the proposed construction on the environment needs to be included in the EIS.
Thank you for the opportunity to review this document.

Sincerely,

[Signature]

William Meyer
District Chief

cc: Mr. Amar Sappal, Project Manager,
    Dept. of Transportation Services, RTDD
    City and County of Honolulu
    650 South King Street, 3rd Floor
    Honolulu, Hawaii 96813
Ms. Brigid Hynes-Cherin  
Director, Region IX  
Urban Mass Transportation Administration  
211 Main Street, Room 1160  
San Francisco, California 94105  

Dear Ms. Hynes-Cherin:  

This is in response to the request for the Department of the Interior's comments on the Draft Environmental and Section 4(f) Statement for Honolulu Rapid Transit Development Project, Honolulu County, Hawaii.  

SECTION 4(f) COMMENTS  

We concur that there are no feasible and prudent alternatives to the use of various identified 4(f) properties in the design and construction of the Honolulu Rapid Transit Development Project. We also concur with all planned measures to minimize harm.  

ENVIRONMENTAL STATEMENT COMMENTS  

The Draft Environmental Impact Statement does not fully identify mitigating measures to reduce secondary impacts to coastal water quality from increased run-off from transit parking and maintenance facilities.  

Page 5-56, 5.8.1 Water Quality - Maintenance facilities and large parking lots will have oil/water separators. This will give protection to coastal waters.  

Page 5-57, 5.8.2 Groundwater - There is not adequate discussion of the monitoring and maintenance programs for underground storage tanks. We recommend coordination on monitoring and maintenance program with Environmental Protection Agency.  

Page 5-62, 5.8.5 Dredge and Fill - We recommend consideration of an alternative with no cofferdam across Nuuanu Stream.
SUMMARY COMMENTS

The Department of the Interior has no objection to Section 4(f) approval of this proposal.

Thank you for the opportunity to provide these comments.

Sincerely,

Jonathan P. Deason
Director
Office of Environmental Affairs

cc:
Mr. Amar Sappal
Project Manager
Rapid Transit Development Division
Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Mr. Donald J. Emerson, UGM-22
Urban Mass Transportation Administration
U.S. Department of Transportation
400 7th Street, S.W., Room 9301
Washington, D.C. 20590
Mr. Joseph Magaldi, Jr.
Department of Transportation Services
City and County of Honolulu
650 South King Street
Honolulu, HI 96813

Dear Mr. Magaldi:

HONOLULU RAPID TRANSIT DEVELOPMENT PROJECT

As requested by your letter of March 23, 1990, we have reviewed the final draft of the Alternatives Analysis and Draft Environmental Impact Statement (AA/DEIS) for the Honolulu Rapid Transit Development Project and the accompanying Plan and Profile Drawings, March 1990. The Navy requests that the proposed guideway alignment adjacent to our Pearl City Junction property, as shown on sheets 3 and 4 of the Plan and Profile Drawings, provide enough clearance so as not to impact upon the Navy's property.

Thank you for the opportunity to review the AA/DEIS. Should you have further questions, the Navy's point of contact is Mr. Bill Liu, telephone 471-3324.

Sincerely,

W.K. Liu
Assistant Base Civil Engineer
By direction of
the Commander
May 29, 1990

Mr. Benjamin B. Lee
Chief Planning Officer
Department of General Planning
City and County of Honolulu
650 South King Street, 8th Floor
Honolulu, Hawaii 96813

Dear Mr. Lee:

We have reviewed the Draft EIS for the Honolulu Rapid Transit Development Project transmitted by Joseph Magaldi's March 23, 1990, letter. Since the airport spur line was deleted from the considered alternatives, we have no comments on this DEIS.

We do note that, prior to construction of the proposed system, a Notice of Proposed Construction, FAA Form 7460-1 must be filed for our review and coordination.

Thank you for the opportunity to review this DEIS.

Sincerely,

David J. Walhouse
Airport Engineer/Planner

Henry A. Sumida
Airports District Office Manager

cc:
Amar Sappal
DATE OF TRANSMISSION: 6/5/90

TO WHOM: Mr. Amor Seippel

LOCATION: Hawaii

PHONE NUMBER: 8-808-527-6787

SUBJECT: Comments on City & County of Honolulu (draft EIS)

NUMBER OF PAGES: 4

FROM WHOM: Mr. Dan Harris

LOCATION: HP-09, San Francisco, CA

PHONE NUMBER: 8-484-2611

FACSIMILE OPERATORS INITIALS: SENDING OFFICE INITIALS:

REMARKS:

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

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________________________________________________________________________
Mr. Amar Sappal, Project Manager  
Rapid Transit Development Division  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, Third Floor  
Honolulu, Hawaii 96813

Dear Mr. Sappal:

The Federal Highway Administration (FHWA) has reviewed the City and County of Honolulu draft environmental impact statement (draft EIS) for the Honolulu Rapid Transit Development Project in Honolulu, Hawaii. The following comments are provided.

1. General. Detailed comments on the proposed project's impact on existing and planned improvements on the Federal-aid highway/street infrastructure are not possible since the Transportation Impacts Results Report listed in the bibliography was not provided with the draft EIS. We recommend that appropriate technical appendices be provided to interested agencies with the final EIS.

2. Any operational improvements or right-of-way encroachments/modifications within the access control limits of Interstate H-1 will need to be coordinated with the Hawaii Department of Transportation (Hawaii DOT) and submitted through Hawaii DOT to FHWA for review and approval. Page S-43 of the draft EIS should be revised to reflect this required FHWA approval.

3. "Fixed guideway system" should be defined. The horizontal and vertical alignments depicted in Appendix B appear to limit the guideway options to light rail transit or a similar type of system.

4. The airport should be directly serviced by the proposed transit project. It appears that an alignment design providing direct access to the airport terminal would be possible. Air clearances for the transit vehicles and the various structures would need to be reviewed.

5. A six percent grade may be difficult for steel wheel/steel rail operation. The vertical alignment should be reviewed to minimize the "roller coaster" effect. The 200-foot radius for
the horizontal curves at Ward Street would provide less than a 25 mile-per-hour operation.

6. The design transit vehicle and the length of train are the controlling factors for horizontal and vertical alignments and clearances and for station design. An early determination of the vehicle design criteria is necessary to permit decisions regarding alignment and station design to proceed.

7. Section 5.3.2 (page 5-8). The proposed Makai Viaduct (Nimitz Highway) has not been developed beyond the TSM improvements recommended in the Makai Boulevard Concept final EIS dated February 14, 1986. Since that final EIS had not discussed an alternative which includes an exclusive, 24-hour HOV facility, a final EIS reevaluation, and possibly a supplemental EIS, would be required if Federal-aid Highway Program funds are utilized to design and/or construct the HOV viaduct.

8. Section 5.4.2.3 Fixed Guideway Alternatives, Land Use and Economic Development (page 5-10). Policy decisions on the value capture options should be established prior to the completion of the final EIS. These options have significant effects on project financing alternatives. They may also cause extensive social, economic, and environmental impacts and traffic circulation impacts in the vicinity of certain transit stations where value capture is implemented.

9. Table 1.1, Hawaii DOT 24-Hour Screenline Traffic Volumes (page 1-3). The Moanalua and Kalanianaole screenlines (Page 1-6, Figure 1.5) should be added to this table to show traffic growth between the leeward terminus at the Navy Drum Storage Area and the Primary Urban Center. The latest Hawaii DOT Traffic Summary should also be incorporated in the final EIS.

10. Page 2-5. See comment 7 above regarding the HOV facility between Kekai Interchange to Pacific Street (Makai Viaduct). We recommend the use of a design year of 2010 for any highway improvements that are discussed in the final EIS.

11. Table 2.3 (pages 2-12 through 2-15). It is assumed that the Transportation Impacts Results Report identifies the traffic impacts on local streets in the vicinity of the various proposed Park & Ride Lots and Fixed Guideway Station Sites.

12. Section 2.0 Alternatives Considered. Where Federal-aid Highway System Routes are affected by the proposed Fixed Guideway System, we recommend that roadway cross-sections showing the Guideway in relation to the existing and/or reconstructed highway facilities be provided in the final EIS. The details of the proposed joint use of highway right-of-way and transit facilities should be shown by these cross-sections.
13. Section I - Waiawa to Aloha Stadium (page 2-33). Proposed modifications to Kamehameha Highway include the restriping of traffic lanes to 11-feet. Kamehameha Highway (Federal-aid Primary Route 99) is on the National Network (See 23 CFR Part 658). The designated route must consist of lanes designed with a width of 12 feet or more, or is otherwise consistent with highway safety.

14. Section II - Aloha Stadium to Keeaumoku Interchange (pages 2-35 through 2-39). The draft EIS for Proposed Developments at Naval Base Pearl Harbor, Oahu, Hawaii, dated April 1990 indicates significant modifications of Kamehameha Highway and Salt Lake Boulevard in the vicinity of the Aloha Stadium and the entrance to the Arizona Memorial (Memorial Place). Grade separated interchanges are proposed to accommodate increased traffic generated by the Ford Island causeway. The final EIS for the Honolulu Rapid Transit Development Project should be coordinated with the final EIS for the Proposed Developments at Naval Base Pearl Harbor.

15. Section 5.1.4 Impacts on Services and Tax Base (pages 5-21 and 5-23) and Section 6.1.3 Additional Revenue Sources (pages 6-8 and 6-10). See comment 8 above regarding the value capture options.

16. Bibliography. The EIS should indicate where the various technical report documents are available for public review.

We appreciate this opportunity to review the subject draft EIS. Please send two copies of both the final EIS and the Transportation Impacts Results Report to this office when they become available.

John A. Bates
Acting Director, Office of Planning and Program Development
Memorandum

U.S. Department of Transportation
Office of the Secretary of Transportation

Subject: Alternatives Analysis and Draft Environmental Statement
Honolulu Rapid Transit Development Project
Honolulu, Hawaii

From: Eugene L. Lehr
Chief, Environmental Division

Reply To: Mr. Amar Sappal, Project Manager
Rapid Transit Development Division

Date: May 24, 1990

We appreciate the opportunity to review the Alternatives Analysis and Draft Environmental Impact Statement for this project. We have no comments.
Louis F. Mraz, Jr.
Western Area Director
Urban Mass Transportation Administration
U.S. Department of Transportation
Federal Office Building
1961 Stout Street, Room 520
Denver, CO 80224

MAY 23 1990

Dear Mr. Mraz,

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled Honolulu Rapid Transit Development Project pursuant to the National Environmental Policy Act (NEPA) and section 309 of the Clean Air Act. Our detailed comments are enclosed.

The DEIS analyzes 11 mass transit alternatives (including "no-build") in terms of their transportation and environmental impacts on the City and County of Honolulu. The study corridor covers the coastal area located between Pearl City and Hawaii Kai. The alternatives include transportation system management (with expanded bus service) and several fixed-guideway alignments ranging from six to 18 miles in length.

The document provides a good analysis of the majority of potential impact categories. EPA encourages the development of a fixed guideway alternative in view of potential air quality benefits to the region.

We have rated this document LO-1 (Lack of Objection, Sufficient Analysis—see attached explanation of ratings). Thank you for the opportunity to review this DEIS. Please send three copies of the Final Environmental Impact Statement (FEIS) to this
office when it is filed with our Washington, D.C. headquarters. Please do not hesitate to contact me at (415)-556-5113 or have your staff contact Lisa Micheli at (415)-556-6374 if you have any questions.

Sincerely,

[Signature]

Deanna M. Wieman, Director
Office of External Affairs

Attachment (4 pages)

cc: Mayor, City and County of Honolulu
    City and County of Honolulu, DTS
    Parsons Brinkerhoff Quade & Douglas, Inc.
    Marvin T. Miura, Ph.D., Office of Environmental Quality Control
    Stanley T. Arakaki, ACE, Honolulu
    Brian Choy, HDOH

#90-192
WATER QUALITY

1. The "Affected Environment Water Quality" information summarizes information on impacted waterbodies in the project area (1-38). The Hawaii Department of Health (HDOH) prepared a Nonpoint Source Assessment Report (SAR) in 1988, pursuant to section 319(a) of the Clean Water Act. The SAR summarizes impacts to Hawaiian waterbodies from nonpoint sources. Specifically, Hawaii's SAR confirms that the Ala Wai Canal (12 acres), Honolulu Harbor (1775 acres), Keehi Lagoon (3550 acres), and Pearl Harbor (6615 acres) receive pollution from nonpoint sources. The SAR also concludes that Kewalo Basin (10 acres) is affected by nonpoint sources. Information contained in Hawaii's SAR relevant to this project should be cited in this section of the FEIS.

2. Pursuant to Section 319 of the Clean Water Act, states have the lead role in identifying and controlling nonpoint sources. In Hawaii, HDOH has been designated as the lead agency for implementation of the section 319 Nonpoint Source Program. HDOH prepared a state Nonpoint Source Management Program (SMP), pursuant to section 319(b) of the Clean Water Act which was approved by EPA on January 4, 1990. Hawaii's SMP identifies the following Best Management Practices which would be applicable to the construction and/or operation of the Honolulu Rapid Transit Project.

   * Proper design and construction of access roads
   * Planting vegetation and/or mulching on highly erodible or critically eroding areas
   * Debris basins
   * Dikes or diversions to avoid runoff across erodible areas
   * Grassed or lined waterways or outlets

3. Federal programs and activities are required to be consistent with state SMPs, pursuant to the Federal Consistency review requirements of sections 319(b)(2)(F) and 319(K) of the Clean Water Act. These sections require federal agencies to submit specific assistance programs and development projects to the lead state nonpoint source agency (HDOH) for review for consistency with Hawaii's SMP. We strongly encourage UMTA to work closely with HDOH to satisfy UMTA's responsibilities pursuant to the Federal Consistency requirements of section 319.

4. We recommend that mitigation measures, including oil/water separators installed in parking lot drains and interception or diversion ditches around paved areas, be used to reduce the im-
impact of the operation of the Honolulu Rapid Transit Project on surface water quality. Such measures are especially important since waterbodies in the project area already experience impacts from pollutants delivered by urban runoff. We also recommend that appropriate mitigation measures to reduce sediment loads to surface waters be implemented during construction, including sediment control traps, straw bale filters, inlet sediment traps and monitoring of sediment discharge. UMTA should consult with HDOH in the design of the monitoring program, and data collected should be entered into the STORET data base, to facilitate sharing data with other water quality management agencies.

GROUNDWATER IMPACTS

The DEIS includes a complete, well thought-out, and well written analysis of potential impacts to groundwater quantity and quality, as we indicated upon reviewing a draft of this section in our 15 September 1989 letter. However, we reiterate that the section 1424(e) (Clean Water Act) review and approval process may only occur once final mitigation measures are chosen during the detailed design stage.

RCRA

We also reiterate that any underground storage tanks to be installed would be regulated pursuant to the 1984 amendments to the Federal Resource Conservation and Recovery Act (RCRA). New USTs must meet requirements concerning correct installation, spill and overfill prevention, corrosion protection, and leak protection.

The 1984 amendments to RCRA also require hazardous waste generators to certify that they have taken steps to reduce the volume of hazardous waste generated. Waste reduction measures could include: source separation, recycling, substitution of raw materials, manufacturing process changes, and substitution of products. These methods could be applied to minimize the quantity of degreasing solvents, metals and sludges to be produced by the proposed facility.

SECTION 404 IMPACTS

The temporary cofferdams that would be placed in waters of the U.S. for the construction of supports piers and a subsurface tunnel would require permits from the Army Corps of Engineers pursuant to section 404 of the Clean Water Act. Support piers placed in navigable waters would require Army Corps of Engineers section 10 permits.
EPA will review these permit applications to ensure consistency with the section 404(b)1 Guidelines in order to ensure that the least damaging practicable alternatives are selected and to recommend permit conditions to protect the aquatic environment and mitigate for unavoidable impacts.
SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTIONS

Environmental Impact of the Action

TO—Lack of Objections
The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EO—Environmental Concerns
The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO—Environmental Objections
The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU—Environmentally Unsatisfactory
The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of environmental quality, public health or welfare. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1—Adequate
EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2—Insufficient Information
The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3—Inadequate
EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at the draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

FROM: REGION 9
SAN FRANCISCO

TO: INDIVIDUAL: Mr. Anek Sengal
HONOLULU HSTDD
8-808-527-6987
MAIL CODE: _ TELEPHONE 808-527-6975

SUBJECT: Comment to the AWEIS
(South Honolulu Rapid Transit
Development Project)

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IF COPIES RECEIVED IS NOT LEGIBLE. (Includes cover page)
MAY 22, 1999

Mr. Benjamin B. Lee
Chief Planning Officer
Department of General Planning
City and County of Honolulu
650 South King Street, 8th Floor
Honolulu, HI 96813

Dear Mr. Lee:

We have reviewed the Alternatives Analysis and Draft Environmental Impact Statement (AA/DEIS) for the Honolulu Rapid Transit Development Project.

My September 29, 1989 letter to Deputy Director Joseph M. Magaldi of the Honolulu Department of Transportation Services, voiced the General Services Administration's (GSA) concerns with regard to the proposed encroachment on the Prince Kuhio Federal Building—Courthouse site. Although it predated many of the other letters of commentary in the appendices to the AA/DEIS, we noted that our letter was not included nor were the issues contained therein addressed. Therefore, because we believe the potential severity of the impacts warrant more than a cursory acknowledgement buried in the text of the document, we again submit for review and comment the issues contained in our earlier letter.

- Limitation on the potential for future site development, particularly as regards expansion for the U.S. District Court.
- Loss in market value of the building and site.
- Vibration and potential damage to the structure.
- Loss of security and privacy of federal tenants housed on lower floors of the Federal building.
- Loss of parking (which is currently inadequate for the needs of GSA's tenant agencies).
- Intrusive noise levels.
- Disturbance to the Federal building child care center.
- Visibility of the railway and passing trains up to the third floor level.
- Aesthetic impact on the building's design.
- Loss of landscaping because mature trees that now shade the parking area are taller than the proposed rail height.

Of the three routes proposed through the downtown, the Hotel Street subway appears to be less damaging both aesthetically and environmentally. While this alternative is the most costly to construct, it would in turn provide the fastest, most attractive level of service. Optimum service tends to draw the greatest number of riders.

Thank you for the opportunity to review and provide comments on the AA/DEIS. Please keep us advised of developments as the project advances towards design and construction. We also ask that we be provided a copy of the Locally Preferred Alternative Report when it becomes available.

Sincerely,

[Signature]

RICHARD B. WELSH, JR.
Assistant Regional Administrator
Public Buildings Service

Attachment

CC:
Mr. Amar Sappal, Project Manager
Department of Transportation Services, RDDB
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813
Mr. Joseph N. Magalí, Jr.
Deputy Director
Department of Transportation Services
City and County of Honolulu
650 South King Street
Honolulu, HI 96813

Dear Mr. Magalí:

This is in response to your letter of August 10, 1985. It also will serve as a follow-up to the September 11 meeting in Honolulu between Marvin Char and Faith Miyamoto of your staff and the General Services Administration's (GSA) Field Office Manager Pat Sherry and Facilities Planner Marie Lehman.

It has been noted that four of the proposed alternative alignments for the Rapid Transit Development Project would place guideways across the parking lot on the Ala Moana Boulevard side (front) of the Prince Kuhio Federal Building-Courthouse. Mr. Char indicated that the elevated rails would pass through the parking lot at a height of approximately 20 to 21 feet, with the transit vehicles extending 10 feet above the rail. Each supporting column would have an approximate eight foot diameter, with the span between columns ranging from 60 to 100 feet.

Two possible placements of the elevated areaway across the Federal site were discussed: across the middle of the parking area, and along the walkway between the building and parking area. Based on this early-on analysis, we believe that either of these alignments will significantly impact the Federal building and the operations of its tenants. Concerns we have identified at this time are as follows:

- Limited potential for future site development
- Visibility of railway and passing trains up to the third floor level, as well as loss of security and privacy of floor levels
- The Federal tenants on these floors
- Loss of parking (which is currently inadequate)
- Loss in market value of building and site
- Vibration and potential damage to structure
- Disturbance to child care center (at southwest corner of the Federal Building)
- Aesthetic impact on the building's design
- Loss of landscaping (native trees that shade the parking area are taller than the proposed rail height)
- Noise
All of the potential impacts outlined above are significant. However, foremost and of immediate concern is our need to provide suitable space to house the growth of Federal agencies in Honolulu in a timely and cost-effective manner. Because of the high cost and limited availability of commercial office space, we are looking to the Federal building parking area as a potential site for future expansion. Therefore, we must take this opportunity to strongly voice our objection to the proposed alignment of the fixed guideway across the Prince Kuhio Building site.

We understand that your staff is now preparing the Alternatives Analysis/Draft Environmental Impact Statement (AA/DEIS) for submission to the Urban Mass Transportation Administration in the near future and that presentation to the 1980 State Legislature for approval and funding is planned. Please keep us advised of project developments. If you have any questions or need additional information, please contact Planning Staff Director Mary E. Brant or Marie Lehman of her staff at the above address or by phone at (415) 974-7624.

Sincerely,

RICHARD B. WELLS, JR.  "/1/ RICHARD B. WELLS JR."  
Assistant Regional Administrator  
Public Buildings Service
2.0 HAWAII STATE AGENCIES
Thank you for the opportunity to comment on the City's Alternative Analysis and Draft Environmental Impact Statement for the Honolulu Rapid Transit Development Project (EIS).

Initially, we wish to note that the Aloha Tower redevelopment project will probably have an impact on Nimitz Highway traffic both during and after construction. It is anticipated that construction activity will commence in 1991 or 1992. We note that one of the alternative routes proposed in the EIS is Nimitz Highway. Accordingly, if the Nimitz alternative is selected, its traffic impact on Nimitz during construction must be closely reviewed particularly if construction activity occurs at or about the time the Aloha Tower redevelopment is underway.

The Aloha Tower Development Corporation (ATDC) is not in a position to endorse any one of the three alignments at this time. However, we do wish to submit the following comments which are primarily from the point of view of the transit project's relation to the Aloha Tower redevelopment:

1. **Nimitz Alignment** - The two stations proposed at Piers 13 - 15 and Irwin Park would provide good service and visibility to the project area. However, we are very concerned about the visual impacts of this alignment, and particularly the Irwin Park station as depicted on Page 5 - 89 of
the EIS. We would far prefer to see the station moved to the mauka side of Nimitz Highway* or relocated to the block between Bishop and Alakea Streets in order to reduce the visual impact on Irwin Park. We would also recommend that, if a Nimitz alignment is selected, the system with the least visual impact be utilized.

2. Hotel Street Alignment – Although the Hotel Street underground alignment will have the least visual impact on the downtown area and will probably serve the overall downtown area better than the Nimitz alignment, its two stations will be 3 to 4 blocks away from the Aloha Tower project. In addition, neither station has direct access to Fort or Bishop Streets, which will be the primary mauka-makai pedestrian accesses to the project.

3. Beretania-Alakea Alignment – The alignment would place one station within the Aloha Tower project area (the mini-park mauka of Piers 5 and 6), thus providing reasonably good access to the project. This alignment would have far less visual impact on the Aloha Tower project than the Nimitz alignment.

Very truly yours,

Randall Y. Iwase
Executive Officer

cc: ATDC Board Members
Edward Y. Hirata, Director, Department of Transportation

*We would like to request that, if this station site is selected, its design be coordinated with the Aloha Tower project in order to insure design compatibility and pedestrian linkages.
The Honorable Frank F. Fasi  
Mayor  
City and County of Honolulu  
City Hall  
Honolulu, Hawaii

Dear Mayor Fasi:

Subject: Honolulu Rapid Transit Development Project  
Draft EIS

Thank you for the opportunity to review the subject document. We have the following comments to offer:

A. Aloha Stadium

1. We are opposed to the location of the transit station in the main parking lot as indicated in Alternatives 4, 5, 6 and 9. This location is within the main stadium parking area which is secured when the facility is not in use, would adversely affect the operations of the flea market, and would hinder vehicular traffic to the reserved parking area.

2. We prefer the transit station being located in the overflow parking area across Salt Lake Boulevard generally as indicated in Alternatives 3, 7 and 8. However, pedestrian bridges across Salt Lake Boulevard should be included with this location to minimize the crossing of vehicular and pedestrian traffic.

3. The view of the Arizona Memorial from the upper concourse level of the Stadium should be considered when the route alignment and elevators are finalized.
B. Liliha Civic Center

1. The proposed Liliha Civic Center which is listed as a "State office project" in the EIS, will be a major State facility built around the former O.R. & L. property. First increment design funds of $1.5 million have been appropriated for FY 1990-1991.

2. We are opposed to Alternative Alignments 6, 8 and 11 since the aerial guideway will bisect the proposed development and interfere with functioning on the site.

3. We are opposed to those portions of Alternative Alignments 3, 4, 9 and 10 which pass beneath the Liliha Civic Center site since the underground guideway will be located below a high-rise office building and a multi-level parking structure and will require surface structures on site.

4. We would favor Alternative Alignments 3, 4, 9 and 10 if they ran along King Street, rather than running beneath the Liliha Civic Center site, before going underground to Hotel Street.

C. Richards Street Parking Structure

1. We favor the underground route along Hotel Street in Alternatives 3, 4, 9 and 10.

2. We concur with the Downtown Improvement Association's comments on location of the transit stations along Hotel Street.

3. If the Hotel/Alakea Street station is selected, it should be designed so as not to displace the State's basement parking in the City's new parking structure.

D. Hawaii Capital District

We have some concerns on Alternatives 3, 4, 9 and 10:
1. How will the subway excavations affect the foundations of the State Capitol, Kekauluohi and Kalanikou and Library buildings? A discussion on settlement effects should be included.

2. How will noise and vibration affect the State Capitol, Kekauluohi and Kalanikou buildings?

3. The same concerns expressed on Page 5-73 for the Mission Memorial Annex Building should also be discussed for the State Capitol, Kekauluohi and Kalanikou buildings.

Should there be any questions, please have your staff contact Mr. Cedric Takamoto of the Public Works Division at 548-7192.

Very truly yours,

RUSSEL S. NAGATA
State Comptroller

CT:em/  cc: City and County of Honolulu
Department of Transportation Services
Parsons Brinckerhoff Quade & Douglas, Inc.
Mr. Harold Masumoto
The Honorable Frank F. Fasi  
Mayor of the City and  
County of Honolulu  
City Hall  
Honolulu, Hawaii 96813  

Dear Mayor Fasi:  

Subject: Honolulu Rapid Transit Development Project  
Alternatives Analysis Draft Environmental  
Impact Statement (DEIS)  

The State Department of Agriculture has reviewed the  
subject DEIS and finds that our concerns have been addressed.  
We have no further comments to offer.  

Thank you for the opportunity to comment.  

Sincerely,  

YUKIO KITAGAWA  
Chairperson, Board of Agriculture  

YUKIO KITAGAWA  
CHAIRPERSON, BOARD OF AGRICULTURE  
Suzanne D. Peterson  
DEPUTY TO THE CHAIRPERSON  
FAX: 548-6100  
Mailing Address:  
P.O. Box 22159  
Honolulu, Hawaii 96822-0159  
May 23, 1990  

C: Department of Transportation Services  
Parsons Brinkerhoff Quade and Douglas, Inc.  
Office of Environmental Quality Control
May 15, 1990

TO: The Honorable Frank F. Fasi, Mayor
City and County of Honolulu

FROM: Joseph K. Conant
Executive Director

SUBJECT: ALTERNATIVES ANALYSIS/DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR THE PROPOSED HONOLULU RAPID TRANSIT DEVELOPMENT PROJECT

We have reviewed the subject report and offer the following comment.

We note that up to 69 businesses may be displaced by the proposed project. Pursuant to Chapter 111, HRS, the HFDC has oversight responsibility for ensuring that proper relocation assistance is provided to displaced persons and businesses. As provided in section 111-6, HRS, we will await receipt of a copy of the draft relocation assistance plan for review.

Thank you for the opportunity to comment.

c: City & County of Honolulu, DTS
Parsons Brinckerhoff Quade & Douglas, Inc.
Dr. Marvin Miura, OEQC
The Honorable Frank F. Fasi
Mayor, City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mayor Fasi:

Re: Alternatives Analysis and Draft Environmental Impact Statement for the Honolulu Rapid Transit Development Project

The Department of Business and Economic Development (DBED) has reviewed the Alternatives Analysis and Draft Environmental Impact Statement (AA/DEIS) and would like to submit the following comments:

In general, we found the analysis of energy impacts in this report to be fairly superficial.

It is estimated in the AA/DEIS that approximately 60 million kilowatt-hours of electricity per year would be required to operate the fixed guideway system. No information is provided as to how this figure was arrived at, what fixed guideway technology it applies to, or what length of guideway is assumed. We assume that it applies to the full-length fixed guideway alternatives.

Very little information has been provided on the impact of a rapid transit system on electrical generation. The report states that approximately 60 million kWh of electricity would be required to operate the fixed system. There is no discussion on hours of operation, the system's peak, or the impact on the utility's peak demand. If we assume that the system has a 40% capacity factor and operates about 3,500 hours per year, the system would have about a 17 MW/year impact. We might also assume the rapid transit would have its highest activity demand before 8 a.m. and between 4-6 p.m. The utility's peak is generally from 6:20 p.m. with the major impact from the residential sector. Obviously, if these assumptions are incorrect, there could be a significant impact on our electrical supply. These issues need to be addressed.

On pages 5-63 and 5-64, the AA/DEIS states that the longer fixed guideway alternatives would require more electrical energy to operate than the shorter MOS fixed guideway segments, the No-Build, or the TSM alternatives. It also
Mayor Frank F. Fasi  
Page 2  
May 21, 1990  

states that the MOS segments, the No-Build and the TSM alternatives will consume more diesel fuel energy than the longer fixed guideway alternatives. A more detailed analysis is needed.

The AA/DEIS states that operation of the fixed guideway and TSM alternatives would decrease auto gasoline consumption by minor amounts (1-2%), relative to the No-Build alternative. This figure appears to be derived from the projected reduction in daily auto vehicle miles traveled (Table 4.22). A comparison of the TSM and fixed guideway alternatives to the No-Build alternative on the basis of energy consumed per passenger mile might provide a more fruitful methodology for analyzing fuel consumption impacts.

Thank you for the opportunity to comment on this AA/DEIS.

Sincerely,

Roger A. Ulveling

RAU/PE:dki
| From: |  |
| To: Fox Linda Gina A B C D E |
| To: MANAGING DIRECTOR OIC AUDITORIUMS BUDGET BUILDING CIVIL DEFENSE CIVIL SERVICE CORPORATION COUNSEL DATA SYSTEMS FINANCE FIRE GENERAL PLANNING HEALTH HOUSING HUMAN RESOURCES LAND UTILIZATION MEDICAL EXAMINER MUNICIPAL REFERENCE PARKS & RECREATION POLICE PROSECUTING ATTORNEY PUBLIC WORKS ROYAL HAWAIIAN BAND TRANSPORTATION SERVICES BOARD OF WATER SUPPLY PROTOCOL CULTURE & ARTS LEGIS. LIASON |
| For: |
| 3 MAY 89 9:59 AM |
| Due date for completed action to arrive to the Office of the Mayor |
| REMINDER: |
| 1. Request extension if needed □ |
| 2. Prepare interim reply if necessary □ |
| COMMENTS: Copied for our files. |
| JOSEPH M. MAGALDI, JR. Deputy Director |

NO. 1 (10/88)
The Honorable Mayor Frank Fasi  
City and County of Honolulu  
650 South King Street  
Honolulu, Hawaii 96813

Dear Mayor Fasi:

Subject: Alternatives Analysis and Draft Environmental Impact Statement—Honolulu Rapid Transit Development Project

We have reviewed relevant sections of the subject document and have no comments except to point out that a portion of the H-1 Interstate Highway located in Makalapa Crater is designated within the State Land Use Conservation District.

Thank you for the opportunity to comment.

Sincerely,

ESTHER UEDA  
Executive Officer

EU:to

cc: C&C, DTS  
PBQ&D, Inc.  
QEQC
April 9, 1990

Engineering Office

Honorable Frank Fasi, Mayor
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mayor Fasi:

Honolulu Rapid Transit Development Project
Alternatives Analysis DEIS
Honolulu, Hawaii

Thank you for providing us the opportunity to review the above subject project.

We have no comments to offer at this time regarding this project.

Sincerely,

Jerry M. Matsuda
Lieutenant Colonel
Hawaii Air National Guard
Contracting & Engineering Officer

cc: City and County of Honolulu, DTS
Parsons Brinckerhoff Quade
& Douglas, Inc.
Marvin T. Miura, Ph.D., OEQC

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
2040 DIAMOND HEAD ROAD, HONOLULU, HAWAII 96818-4485
The Honorable Frank F. Fasi, Mayor
City and County of Honolulu
650 S. King Street
Honolulu, Hawaii  96813

Dear Mayor Fasi:

SUBJECT: Honolulu Rapid Transit Development Project

We have reviewed the subject development project and have the following comments to make:

1. The proposed routes pass adjacent to six public schools.
   a. Makalapa Elementary
   b. Radford High
   c. Aliamanu Elementary
   d. Aliamanu Intermediate
   e. Kalili-Kai Elementary
   f. Jefferson Elementary

   We are concerned that the noise from the fixed railway will adversely affect learning at these school sites.

   If the noise exceeds the Department of Health's acceptable level, we request that sound-proofing be provided to the schools.

2. We request that any construction in the vicinity of the schools be scheduled during the summer months as much as possible. The construction noise and dust will be a major problem to the schools.
3. The coordination of traffic during the construction period is also vital to maintain adequate access by the public to the schools. The four schools along Salt Lake Boulevard will be most greatly affected due to already limited access.

Sincerely,

Charles T. Toguchi
Superintendent

cc: E. Imai
    M. Oda
    L. Viduya

April 17, 1990
The Honorable Frank Fasi, Mayor  
City and County of Honolulu  
c/o Department of General Planning  
Honolulu Municipal Building  
530 South King Street  
Honolulu, HI 96813  

Dear Mayor Fasi:

Subject: Honolulu Rapid Transit Development Project - Alternatives Analysis and Draft Environmental Impact Statement

We have reviewed the draft and offer the following comments.

We suggest that a more thorough discussion and analysis of the economic and relocation impacts along the proposed corridors be included in the final EIS.

While we note that page 5-63 states that electrical power suppliers have confirmed their ability to supply sufficient electrical energy for the proposed system, we believe that estimates of the electrical energy requirements for the fixed guideway systems should be included. This should be compared with the projected capacities and commitments of the electrical power suppliers. The amount of natural resources required to generate the electrical requirements should also be calculated.

We further suggest that as a proposed mitigative measure, safety features should be developed to insure that alternate modes of transportation such as pedestrian and bicycle travel would be fully integrated with the fixed guideway system.

Thank you for the opportunity to comment.

Sincerely,

Marvin T. Miura, Ph.D.  
Director

cc: Dept. of Transportation Services
The Honorable Frank F. Fasi, Mayor  
City and County of Honolulu  
650 South King Street  
Honolulu, Hawaii 96813

Dear Mayor Fasi:

Subject: Honolulu Rapid Transit Development Project Alternatives Analysis Draft EIS

Thank you for allowing us to review and comment on the subject draft EIS. We do not have any comments at this time.

Very truly yours,

JOHN C. LEWIN, M.D.  
Director of Health

cc: City Department of Transportation Services (Attention: Amar Sappal)  
Parsons Brinckerhoff Quade & Douglas, Inc.  
Office of Environmental Quality Control
June 4, 1990

Mayor Frank F. Fasi
City and County of Honolulu
650 South King Street
Honolulu, Hawaii  96813

Dear Mayor Fasi:

We have reviewed the City Department of Transportation's AA/DEIS for the Honolulu Rapid Transit Development Project. Due to our agencies' close affiliation, this letter represents the assessment of the Department of Human Services and the Hawaii Housing Authority.

We have no objection to any alternative at this time except we would urge your office to consider the "No Build" alternative as unviable. As the AA/DEIS points out, it does not promote the goals of State and City planning.

Thank you for this opportunity to submit comments on this study. If you have any questions, please call Mr. Mitsuo Shito of the Hawaii Housing Authority at 848-3230 or Colleen C. Sakai at 848-3220.

Sincerely,

WINONA E. RUBIN
Director
Department of Human Services

MITSUO SHITO
Executive Director
Hawaii Housing Authority

cc:  City and County of Honolulu, Department of Transportation
     Parsons Brinckerhoff Quade & Douglas, Inc.
     Marvin T. Hur, Ph. D. Director, OEQC

AN EQUAL OPPORTUNITY AGENCY
MEMORANDUM

TO: Honorable Marvin T. Miura, Director
   Office of Environmental Quality Control

FROM: William W. Paty, Chairperson
       Board of Land and Natural Resources

SUBJECT: Draft EIS
         Honolulu Rapid Transit Development Project
         Alternatives Analysis

May 22, 1990

Thank you for giving our Department the opportunity to comment on
this matter. We have reviewed the materials you submitted and have
the following comments.

We are concerned of the visual impacts at Iolani Palace. There
might be a need to encroach beyond the perimeter fence and also to
redesign the adjacent pedestrian mall.

Additionally, at Aiea Bay we are concerned about potential
conflicts with access to and the use of the park in which plans for
implementation are currently being prepared.

Our Division of Aquatic Resources (DAR) has no objection to the
proposal from the aquatic resources standpoint. DAR has previously
commented on the Honolulu Rapid Transit Development Project. All
of their concerns have been satisfactorily addressed, and no new
issues that might affect aquatic resources values arose in the
latest document.

If you have any questions, please feel free to call me or Cathy
Tilton at our Office of Conservation and Environmental Affairs at
548-7837.

[Signature]

WILLIAM W. PATY

cc: DAR, State Parks, OSP
TESTIMONY BY
EDWARD Y. HIRATA
ON
THE HONOLULU RAPID TRANSIT PROJECT
AT
THE STATE CAPITOL
ON
MAY 8, 1990

THANK YOU MR. MAGALDI! MY NAME IS RON TSUZUKI AND I AM THE
HEAD PLANNING ENGINEER OF THE STATE HIGHWAYS DIVISION. TONIGHT,
I AM REPRESENTING ED HIRATA, THE DIRECTOR OF THE STATE DEPARTMENT
OF TRANSPORTATION, WHO WANTED TO BE HERE BUT COULD NOT BECAUSE OF
A CONFLICT IN HIS SCHEDULE. AS YOU MAY KNOW, ONE OF THE PRIMARY
OBJECTIVES OF OUR DEPARTMENT IS TO ATTACK TRAFFIC CONGESTION ON
OUR HIGHWAYS.

OVER THE YEARS, WE HAVE SEEN A SIGNIFICANT INCREASE IN
TRAFFIC CONGESTION. BY REVIEWING THE INCREASE IN POPULATION, CAR
REGISTRATIONS, LICENSED DRIVERS AND TOURISTS, WE CAN SEE WHY THIS
INCREASE IN CONGESTION HAS OCCURRED.

IN THE LAST 10 YEARS, OUR STATE POPULATION HAS GONE FROM
953,300 TO 1,112,100, AN INCREASE OF 16.7%.
DURING THAT SAME PERIOD, CAR REGISTRATIONS HAVE INCREASED FROM 610,570 TO 855,057, AN INCREASE OF 40% AND THE NUMBER OF DRIVERS HAS INCREASED FROM 543,202 TO 657,156, AN INCREASE OF 21%.

THE NUMBER OF TOURISTS HAS ALSO INCREASED FROM 11,823,907 TO 16,657,063, AN INCREASE OF 41%. MANY OF THESE TOURISTS ARE IN RENTAL CARS THAT TRAVEL ON OUR HIGHWAYS.

BASED ON THESE FACTS, I AM NOT SURPRISED THAT TRAFFIC CONGESTION HAS ALSO INCREASED OVER THE PAST 10 YEARS.

WE ARE DOING OUR BEST TO INCREASE THE VEHICLE-CARRYING CAPACITY OF OUR HIGHWAYS. HOWEVER, OUR OPTIONS ARE LIMITED IN THIS AREA. MANY OF OUR CONGESTED HIGHWAYS PASS THROUGH HEAVILY DEVELOPED RESIDENTIAL AND COMMERCIAL AREAS. FURTHER IMPROVEMENTS TO THESE HIGHWAYS WILL CAUSE SIGNIFICANT IMPACTS ON SURROUNDING COMMUNITIES.
WE NEED TO PROVIDE ATTRACTIVE ALTERNATIVES TO THE AUTOMOBILE. THIS IS WHY, FOR THE FIRST TIME IN THE HISTORY OF OUR STATE, WE HAVE OUR GOVERNOR AND THE MAYOR OF THE CITY AND COUNTY OF HONOLULU AGREEING ON THE NEED FOR A RAPID TRANSIT SYSTEM FOR HONOLULU.

BOTH THE GOVERNOR AND MAYOR WERE RECENTLY SUCCESSFUL IN CONVINCING THE STATE LEGISLATURE TO PROVIDE A DEDICATED FUNDING SOURCE FOR THE RAPID TRANSIT SYSTEM.

WE STRONGLY SUPPORT THE CITY'S EFFORTS AND THEIR RECOMMENDATION OF ALTERNATIVE 3, THE KAMEHAMEHA HIGHWAY/HOTEL STREET ALIGNMENT. WE FEEL THAT THIS ALIGNMENT WILL BEST SERVE THE NEEDS OF OUR PEOPLE.

WE ARE PRESENTLY COOPERATING WITH THE CITY IN THEIR STUDIES AND WILL CONTINUE TO SUPPORT THEM IN THEIR FUTURE PLANNING AND DESIGN OF THE SYSTEM.

THANK YOU FOR ALLOWING US TO SHARE OUR THOUGHTS WITH YOU.
Mr. Joseph M. Magaldi, Jr.
Deputy Director
Department of Transportation Services
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

Thank you for your letter of March 23, 1990, and congratulations to you and your staff for being applauded by Transportation Secretary Skinner and UMTA as having one of the finest rapid transit AA/DEIS document ever submitted. This is a tribute to the excellent staff you have assembled and to the long hours they put in to get the project "back on track".

The Department of Transportation, the Office of State Planning, and the Department of Budget and Finance, with assistance from the Urban Planning Department of the University of Hawaii, will be reviewing the AA/DEIS documents. We will try to get our comments back to you by your specified May 23rd date.

Again, congratulations on your fine effort.

With kindest regards,

Sincerely,

JOHN WAIHEE
Mr. Amar Sappal  
Project Manager  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street  
Honolulu, Hawaii 96813

Dear Mr. Sappal:

Thank you for the opportunity to review and comment on the Alternatives Analysis/Draft Environmental Impact Statement (AA/DEIS) for the Honolulu Rapid Transit Development Project. We are supportive of the concept of rapid rail transit serving the Kakaako District.

Our comments regarding the AA/DEIS focus on the portions of the various alternative alignments that impact the Kakaako area. We would like to take this opportunity to share with you our preferred alignment and the reasons.

1. Rail Alignments

There are two alignments proposed for the Kakaako area. The first enters Kakaako from the Ewa direction along Nimitz Highway at Punchbowl Street, bisecting the federal property at that intersection. The proposed alignment then follows the Pohukaina Street right-of-way in a Diamond Head direction to Ward Avenue, where it turns mauka to Waimanu Street and again turns in the Diamond Head direction. At Kamakee Street, the alignment joins the Kona Street right-of-way near Pensacola Street and follows this alignment out of the District. Stations are proposed to be located at Nimitz Highway-Richards Street, South Street, Ward Avenue, Blaisdell Center, and Piikoi Street.

A second alignment enters the Kakaako District at the intersection of King Street, Kapiolani Boulevard, and South Street. The alignment follows...
Kapiolani Boulevard and joins the Waimanu Street right-of-way near Dreier Street. The alignment then follows Waimanu Street to Kamakee Street where it joins the Kona Street right-of-way. Stations are proposed for Civic Center (Kapiolani Boulevard, South Street, and King Street), Blaisdell Center, and Pilikoi Street.

In general, we find that the Pohukaina Street alignment will better serve the future residents and businesses in Kakaako for the following reasons.

First, this alignment is more centrally placed within the District than the Kapiolani Boulevard/Waimanu Street alternative. This location, we feel, will serve a greater number of people that will live and work in Kakaako. There are major commercial, residential, and industrial developments contemplated along Ala Moana Boulevard and Ward Avenue, and this alignment would serve these areas well.

Second, this alignment will better serve the Kakaako District makai of Ala Moana Boulevard as well as the Aloha Tower Project. The Kakaako Makai Area would allow as much as 7.5 million square feet of office, retail, waterfront, and recreational uses. It is anticipated that the Makai Area would contain a regional waterfront park, amphitheater, performing arts center/museum, cruise ship berthing, and a commercial fishing village. The Aloha Tower Project would include an additional 2 million square feet of floor area which includes retail, office, residential, and hotel use. Both the Makai Area and the Aloha Tower Project will be regional attractors of both residents and visitors. We believe that it is critical that there is good access to the facilities via public transportation. Since the rapid transit system would link other regional facilities such as the Blaisdell Center, the downtown area, and Waikiki, we believe that it is
only appropriate that the Makai Area and the Aloha Tower also be linked to such a system.

As you know, the AA/DEIS also considered Halekauwila Street as a possible alignment for the rapid transit system. Apparently, Halekauwila Street was eliminated from consideration because it would affect the historic Mother Waldron Park. We note, however, that the Hawaii Community Development Authority (HCDA), through its Improvement District program, intends to straighten Halekauwila Street through the upper portion of Mother Waldron Park. Final approval for this action is scheduled for mid-1990.

We believe that Halekauwila Street could also be considered for a guideway route since it is designated as a local street in the Mauka Area Plan. Our understanding is that placement of a guideway on Pohukaina Street would result in the loss of one travel lane. Since it is one leg of the Queen-Pohukaina-Auahi Street couplet, this may have a more significant impact on Kakaako vehicular traffic than the placement of the guideway on Halekauwila Street.

To summarize, we are generally supportive of the Pohukaina Street alignments (Alternatives 5, 6, 7, 8, and 11) which follow the more central route through Kakaako, but we believe that Halekauwila Street could also be considered as a possible alternative.

2. Stations

The proposed stations appear to have been appropriately located. The station sites will serve a number of existing uses and are centrally located to minimize the distances to these activity nodes. We feel, however, that the process should not preclude the possibility of additional stations in the future. Of particular concern is the distance on the Pohukaina Street alignment between the South Street station and
Ward Avenue station. Significant development is expected in this area, and as planned, the distance between these two stations may warrant reexamination. Since the proposed rapid transit system is not a high speed commuter line, we believe an additional station and the accompanying minor delay in travel time should not be a major factor in the viability of the system.

3. Maintenance Facilities in Kakaako

Although not mentioned in the AA/DEIS, our understanding is that a maintenance facility may be considered for the Kakaako District if a fixed guideway option is selected. Should such a facility be located in Kakaako, we are concerned with the space that such a facility would occupy as well as its effects on Kakaako’s business community. As new developments are built in the District, certain amounts of light industrial and commercial space are required to be built. These are intended to be utilized by existing businesses which could be displaced by redevelopment. If a maintenance facility is located in Kakaako, this would serve to reduce the amount of space available for existing Kakaako businesses.

4. Joint Developments

The notion of joint developments between the public sector and the private sector has been discussed in the AA/DEIS as a possible funding alternative. Although we are supportive of the joint development concept in certain situations, the specifics of possible implementation still must be worked out. However, any negotiation process cannot ignore the legislative mandate contained in Chapter 206E of the Hawaii Revised Statutes or the Kakaako Mauka and Makai Area Plans and Rules.

5. Improvement District 3 (ID-3)

Construction for ID-3 will begin in October 1990,
and will last for approximately two years. If Alternatives 3, 4 or 10 are selected, major coordination will be necessary between the work to be done on Kapiolani Boulevard by ID-3 and the proposed alignment. Box drains will be installed on the makai side and water and sewer lines will be installed on the mauka side of the Kapiolani Boulevard right-of-way between South, King, and Dreier Streets. These facilities will be placed at up to (+) 6 feet elevation. Therefore, please note that any tunnel for the rail alignment must at least clear this depth.

6. Business Displacement

The AA/DEIS indicates that business relocation and land acquisition will be necessary for the Pohukaina Street alignment as well as for the alignments along Waimanu Street. We are very concerned about business relocation in Kakaako and therefore would appreciate specific information on the required relocation and land acquisition which has already been identified.

Generally, we are supportive of the proposed rapid transit program and are looking forward to its development in Kakaako. We expect the project to enhance the livability of the District and are confident that it will increase employment in the area. We appreciate this opportunity to communicate our concerns to you and look forward to additional information on the displacement and land acquisition requirements of each of the alignments which will come through Kakaako. Please send this information and direct any inquiries to Milton Arakawa of the HCDA staff at 548-2200.

Very truly yours,

[Signature]

Rex D. Johnson

RDJ/MH:gst

cc: Mr. Murray Towill
(Office of State Planning)
Marvin Miura, Ph.D.
(Office of Environmental Quality Control)
Mr. Joseph M. Magaldi, Jr.
Deputy Director
Department of Transportation Services
City and County of Honolulu
650 S. King St.
Honolulu, HI 96813

Dear Mr. Magaldi:

I acknowledge receipt of and thank you for your letter of March 23, 1990, together with the Alternatives Analysis/Draft Environmental Impact Statement for the Honolulu Rapid Transit Development Project.

I have no comments to make at this time.

With warm personal regards.

Sincerely,

WAYNE METCALF
Hawaii State Representative
Third District

WM:mm
May 23, 1990

Mr. Joseph M. Magaldi, Jr.
Deputy Director
Department of Transportation Services
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

Subject: Alternative Analysis and Draft Environmental Impact Statement (AA/DEIS) for the Honolulu Rapid Transit Development Project

The Office of State Planning and the Department of Transportation have been working closely with the City over the past several years in the initial planning activities for the Honolulu Rapid Transit Project. We have carefully reviewed the subject AA/DEIS and, to facilitate your review, have integrated our concerns in this joint, coordinated response.

We are supportive of the City's renewed and vigorous effort to resolve the mounting transportation problems that confront the residents of Oahu. The scope of the investigation and analysis of mass transportation alternatives encompassed in the AA/DEIS is consistent with the State's objective toward the development of a multi-modal transportation system, including policies that promote mass transportation and reduce the dependence on the use of automobiles. We already have congested highways, limited space for highway expansion and parking improvements, and are looking at sizeable increases in population, employment, and economic activity in the years ahead. These demands can only be met through concurrent pursuit of a variety of mobility options and transportation alternatives, including rapid transit, water ferries, carpool and ride-share programs, decentralization measures such as the Ewa Second City and teleworking programs.

The comments that follow provide our specific concerns and recommendations on the following major components of the AA/DEIS: 1) alternatives; 2) alignment; 3) ridership; 4) costs; 5) financing; and 6) environmental impacts.

Alternatives

The framework for the alternatives analysis (no-build, TSM, fixed guideway alternatives) is sound and the fixed guideway alternatives are generally acceptable. However, we have several concerns with respect to the selection and presentation of alternatives.
The Honorable Frank F. Fasi  
Page 2  
May 23, 1990

We recommend that additional documentation be provided regarding the rationale for determining the length of the alternate alignments and the elimination of certain types of technology not considered as suitable alternatives (e.g., busways, mixed traffic light rail, etc.). A more detailed summary of the 20-year history of mass transit in Honolulu would help to clarify reasons for choosing various alternatives, how this effort builds on previous studies, and what changes have occurred since the previous DEIS was prepared.

The TSM alternative is described within the somewhat restricted context of an expanded bus system with highway improvements, HOV, and park-and-ride facilities. Other programs, such as carpooling, computerized traffic signals, staggered work hours, congestion pricing and private sector initiatives—all of which could contribute to system management—are not included. However, if a narrower context of the TSM alternative is intended, it would be useful to more precisely define this alternative in the final document.

Descriptions of the fixed guideway alternatives emphasize the choice among different physical systems, alignments, and technologies. While Oahu's land use pattern and current levels of transit use and highway demand support a fixed-rail alternative, the success of the system over time will undoubtedly be significantly enhanced through the application of other complementary initiatives and policies, including public transit use incentives, private vehicle use disincentives, and ordinances affecting zoning, land use densities, and parking. We look forward to a more detailed examination of these factors as you proceed with subsequent stages of system planning and design.

Alignment

The AA/DEIS provides a range of alignment options for a fixed-rail system that are, in essence, variations of two principal corridors. It is difficult to select a preferred alignment between terminals of the proposed system since each alternate features fixed combinations of segments, with certain segments less desirable than others. Hence, it is conceivable that while an alignment may on an overall basis be deemed desirable, potential service in selected areas may nonetheless be poor.

In general, we urge that in the delineation of a preferred alignment, greater consideration be given to planned as well as existing activity centers. Areas that are now significant trip generators or are undergoing or targeted for substantial growth and investment, such as the Airport, the Honolulu Waterfront, and Kakaako, can be both enhanced by and contribute to the rapid transit system. We also recommend closer coordination with respective State agencies to assure that proposed transit lines and stations do not detract from and are effectively integrated with planned improvements. More extensive design coordination must also be pursued with the State Department of Transportation to ensure that the selected system and alignment will not infringe on or take lanes from our State highways.
Ridership

We are cognizant of the considerable debate that has surrounded the release of ridership forecasts, as well as the prior development of the patronage model. We have considered the pros and cons of this matter and have found the ridership estimates presented in the AA/DEIS to be reasonable. The assumptions and judgements pertaining to patronage estimates are appropriate for this level of analysis.

While we find the ridership forecasts acceptable in predicting start-up ridership, we do recommend that alternate forecasting procedures be considered prior to system design and development. The methodology for predicting long-term patronage levels should consider a broad range of other land use and transportation policies which have been shown to influence travel demand.

Finally, to promote a better understanding of how the patronage forecast was obtained, we would encourage inclusion of more detailed descriptions of the inputs that were developed, including bus routes and coded lines, headways and speeds for both fixed guideway and bus routes, centroid connectors and the transit paths that were developed. This type of information along with a map showing the feeder bus routes could be included as an appendix to the technical reference document.

Costs

Estimates of capital and operating costs of the proposed rapid transit system, within the established scope of the AA/DEIS, are understandably general due to uncertainties regarding technology, alignments, and design decisions about rolling stock, guideways, stations, and other components of the system. The preliminary adoption of the Vancouver ALRT system for capital cost estimation is logical since the Honolulu transit line will require a medium-capacity mode.

There are, however, several concerns that arise from the preliminary nature of the capital and operating costs provided in the AA/DEIS: 1) The effects of inflation on costs could significantly affect estimated costs, which are based on 1988 dollars; 2) Acquisition costs for rights-of-way may need to be more closely scrutinized, especially in terms of partial versus full takings and current rising trends in real estate values; 3) The development of a transit system through the crowded urban environment that surrounds most of the transit corridor will involve construction difficulties, utilities relocation, traffic management problems and other factors that could further inflate construction costs; 4) O/M cost estimates are difficult to ascertain without knowing how the system will be managed and operated.
Presumably, uncertainties regarding these and other cost components should be reduced once a technology has been selected. We also recognize that potential sources of underestimation of capital and O&M costs may also be partially offset by the estimates of the AA/DEIS which are based on typically high cost prototype systems.

We welcome the opportunity to work with the City and County of Honolulu in reassessing these cost estimates once technology and alignments are selected.

**Financing**

Legislation passed by the 1990 State Legislature provides an unprecedented level of support for a rapid transit system for Honolulu. The parameters for funding, however, would appear to suggest a need for further refinement of the Financial Analysis section of the AA/DEIS.

A more extensive examination of the range of different sources to supplement earmarked funds is in order. Revenue sources such as fuel taxes, parking taxes, motor vehicle weight excise tax, as well as property and income taxes may be used—directly or indirectly—to finance transit.

These additional tax sources should be analyzed in terms of efficiency, equity, revenue yield, stability, and administrative ease. It would also be useful to examine these tax and revenue sources in terms of what, if any, effect they might have on transit patronage. As an example, a tax might be viewed not only as a revenue source but as a means of encouraging transit use. Betterment districts, improvement districts, tax-increment financing and other value capture techniques may also prove to be of increased importance in support of both operating and capital costs.

We also believe it would be appropriate to re-examine the fare policy that is described in the AA/DEIS. Alternate fare policies should be examined in terms of fare elasticities and their impact on farebox revenues. Social policy considerations such as the subsidization of the poor and elderly might also be examined in the context of fare policy.

**Environmental Impacts**

The AA/DEIS addresses the major areas of project impact that can be determined at this preliminary stage of project planning—absent selection of a specific technology and transit system alignment. Our comments regarding environmental impacts are focused primarily on energy, land use, visual resources, and noise.
The Honorable Frank F. Fasi  
Page 5  
May 23, 1990  

Energy  

The document indicates that energy for construction varies little among the alternatives, including those that will require a tunnel. This should be reassessed particularly in the alternate alignment selection process. It is not clear whether additional electrical generating capacity will be needed during peak operating demand. No estimate is given of the energy needed to maintain transit vehicles and to service induced travel demand. It is assumed that in the absence of selection of a specific technology, a basis for estimating energy requirements is not provided. Alternately, if energy estimates are based on the earlier referenced prototype systems, including those which use Linear Induction Motor propulsion, energy consumption may be a significant concern. We recommend that alternatives compare propulsion energy use on a per passenger-mile basis. This may well indicate that a fixed guideway is even more productive and energy efficient than is presently implied.  

Land Use  

The AA/DEIS classifies land use impacts for each transit station and makes clear that several stations were sited primarily to service high volume activity centers, while others were sited to stimulate redevelopment in traditional areas. This same analysis should be a significant factor in the selection of a preferred system alignment, particularly in those areas that are undergoing redevelopment and those that will be major trip generators in the future.  

We are also concerned that desired land use impacts may not be realized unless stations and their surrounding land uses are carefully integrated. We are anxious to review attendant land use measures and policies (e.g., parking standards) anticipated to be pursued by the City for regulating growth and development in these impacted areas.  

Visual Resources  

We recommend that additional sets of visual descriptions of streetscapes, with and without the proposed transit project, be provided in the Final EIS. The integration of stations with existing structures wherever possible will help to mitigate the adverse visual impacts of stations located in the middle of a street. Instead of drawings such as the those provided in the AA/DEIS, the final document should make use of shadow studies and photo montage and retouching techniques to display visual impacts.  

Noise  

The methodology and procedures employed in assessing noise and vibration appear to be appropriate and reasonable. Further noise mitigation measures will be necessary to reduce pass-by decibel levels adjacent to those structures
where impacts would be "possibly significant" if a steel wheel/steel rail technology is selected. If the Hotel Street subway alternative is selected, we recommend that additional vibration propagation tests be performed during the preliminary engineering phase to allow for mitigation measures, especially for those buildings within 25 feet of the proposed alignment.

Other noise level impacts that will require further assessment are those that can be made worse by ricocheting and megaphone effects along high-rise corridors and those associated with station arrivals and departures, warning bells or claxons, and surrounding traffic.

In closing, allow us to reiterate our support for rapid transit as an important component of a balanced transportation system for Honolulu. We find that the AA/DEIS provides an adequate description of system alternatives and an acceptable analysis of the various technical considerations that are required at this time. Accordingly, most of our comments in the preceding sections touch on areas which we feel will require further study and analysis as you proceed in the development process.

In addition to our interest in working with the City in conducting further analysis of system financing methods, management alternatives, and follow-up on ridership forecasting, we consider the development of the Request for Proposal (RFP) document to be one of the most critical phases in the rapid transit development process. We look forward to the opportunity to input into the development of this document.

Thank you for this opportunity to comment.

Sincerely,

Harold S. Masumoto, Director
Office of State Planning

Edward Y. Hirata, Director
Department of Transportation

cc: Dr. Marvin Miura, OEQC
Members of the Department of Transportation Services:

Thank you for this opportunity to present testimony on the proposed Honolulu Rapid Transit Development Project. I am Barara Polk, Provost at Leeward Community College.

We have no objections to the planned transit system per se, but do wish to raise concerns which we hope will be addressed in the final planning. The most serious of these concerns is access to the Waiau Terminus and maintenance facility which will be built adjacent to Leeward Community College. At present, the only access route to Leeward Community College (and thus to the proposed terminal) is from Farrington Highway across the H-1 Freeway to Ala Ike Rd. Students and staff have complained for many years that during peak times (that is, each hour when classes change) it can take twenty minutes or more to enter or exit the campus. During emergencies, we have had even greater problems: I am told that when the campus was evacuated during a tsunami warning, it took nearly four hours to get everyone off campus.

As a result, it is essential that a second access road be constructed to the rapid transit terminal at Waiau to avoid further congestion of Ala Ike Rd. and to permit access by the general public to the transit station. Furthermore, it will be essential to construct that second access road prior to beginning construction of the terminal and maintenance facility, to ensure that construction will not further delay entrance and exit to Leeward Community College.

A second concern is with the aesthetic quality of the Leeward C.C. campus. It will be important that the buildings constructed are pleasing in appearance, with suitable landscaping, to preserve the pleasant atmosphere of the campus. I am told that noise should not be a problem at the maintenance facility, but it is also important that a careful analysis of the activities there be made so that maintenance noise does not affect the campus environment.

It is with some uneasiness that we at the College watch an adjacent vacant area be assigned to another use, for that will limit the College's future potential for expansion. However, we are also cognizant of the need for an improved transportation system and therefore accept this use of the space.

I ask that the planners of the system work closely with the administration of Leeward Community College and the University of Hawaii to ensure that the concerns mentioned above are addressed. Again, I thank you for the opportunity to present this testimony.

Sincerely,

Barbara Polk
May 23, 1990
RE:0556

Mayor Frank Fasi
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mayor Fasi:

Alternatives Analysis/Draft Environmental Impact Statement
Honolulu Rapid Transit Development Project
Honolulu, Hawaii

The Environmental Center has conducted an in-house review of the above cited document with the assistance of Carolyn D. Cook, Environmental Center. The AA/DEIS describes the project initiated to develop solutions to transportation problems in Honolulu. Three alternative approaches are being compared and evaluated to determine which alternative will elicit the most favorable results for the citizens of Honolulu and the surrounding area. These consist of a No-Build Alternative, a TBM (Expanded Bus) Alternative, and a Fixed Guideway Alternative with six full corridors, fixed guideway alternatives which incorporate an islandwide, feeder bus system.

Ordinarily, the Environmental Center conducts reviews with the assistance of the preeminent experts in fields relevant to the subject of the review who are members of the university community. In the present case, this pool of expertise has been co-opted by the direct involvement of these individuals in the project development. Consequently, it would be inappropriate for the Center to solicit advice from these experts, since their contributory advice might be construed as engendering a conflict of interest.

We find the AA/DEIS documents to be exceptionally well constructed and comprehensive. In addition, the preparers have gone to extraordinary lengths to incorporate the concerns of consulted agencies. As a result, the AA/DEIS is one of the most informative and effective documents we have ever seen, and we commend the preparers for the obvious care they have taken in this endeavor.
Mayor Frank Fasi  
May 23, 1990  
Page 1

Thank you for the opportunity to comment on this document, and we look forward to reviewing the Final EIS when it is released.

Sincerely,

John T. Harrison  
Environmental Coordinator

cc: OEQC  
ITS, CGC Honolulu  
Parsons Brinckerhoff Quade & Douglas, Inc.  
L. Stephen Lau  
Carolyn D. Cook
May 15, 1990

The Honorable Frank F. Fasi
Mayor
City and County of Honolulu
Honolulu, Hawaii 96813

Dear Mayor Fasi:

Subject: Honolulu Rapid Transit Development Project

We have received the Alternative Analysis and Draft Environmental Impact Statement transmitted earlier and are replying on behalf of the Waikiki Convention Center Authority.

The Waikiki spur route would be a center roadway alignment for the elevated rail along Kuhio Avenue with either a single platform with access to street level on the mauka side of the street, or side platform with access to both sides of the street as contained in an alternate study. The Waikiki stations are currently indicated at McCully Street on Kalakaua Avenue, at Lewers Street, Kailani Avenue and Kapahulu Avenue and Kuhio Avenue.

The original route map by Parsons Brinckerhoff Quade & Douglas, Inc., indicate stations at Seaside Avenue and at the International Market Place site along Kuhio Avenue.

We believe the present location of the platforms should be reconsidered in light of the proposed Convention Center. As the Center will be the major destination for Waikiki, it would, in our opinion, be ill-advised to not place a station at the Center, preferably with direct access to the second or third level as dictated by the platform configuration.

The Center could offer an information booth to illustrate and explain the transit routes and bus interfaces to visitors and suggest tour options accessible from the transit system, as well as offering ticketing capability.

By locating the station at the Center site, it would be farther away than the present Kailani station. This may necessitate another platform closer to Liliuokalani Avenue to adequately service all of Waikiki. However, by not having a station at the Center site, it will be forcing visitors and residents to walk three blocks from either adjoining station to what will be a major destination of Waikiki. We believe this option would be ill-conceived for Waikiki as the premiere destination area of Hawaii.
The Honorable Frank F. Fasi  
May 15, 1990  
Page two

We would appreciate the opportunity to meet with you to discuss the project further and to constructively discuss additional options.

Sincerely,

Alan S. Hayashi  
Executive Director

ASH/eu  
0376

cc: Mr. Amar Sappal  
City & County of Honolulu, DIS

Mr. Mark Scheike  
Parsons Brinckerhoff Quade & Douglas, Inc.

Dr. Marvin T. Miura  
Director, Office of Environmental Quality Control
3.0 CITY AND COUNTY OF HONOLULU
Honolulu Rapid Transit Development Project  
Department of Transportation Services  
City and County of Honolulu  

Re: Public Input on Alternatives Analysis and Draft Environmental Impact Statement (AA/DEIS)

Mr. Chairman and Members of the Committee:

My name is Rey Grauity and I am Chairman of Neighborhood Board No. 18 which is composed of the Salt Lake, Aliamanu and Foster Village communities, communities with a total population of close to 100,000 residents.

Neighborhood Board No. 18 has been closely involved in the development of the rapid transit system, its involvement beginning in September 1989. Presentations have been made by project officials to our Neighborhood Board and the information has been free-flowing between project officials and Neighborhood Board members. On behalf of the three communities directly impacted by the proposed plans, Neighborhood Board No. 18 would like to express its appreciation to the rapid transit team for its sincere efforts at facilitating and promoting community input and involvement.

Neighborhood Board No. 18 wholeheartedly supports rapid transit. We wish that it could be done without the necessity of a tax increase, but if necessary, Neighborhood Board No. 18 supports rapid transit even with a 1/2% increase in the general excise tax. (And we did communicate our Board’s position to our State legislators in the critical days of the last legislative session.)

Neighborhood Board No. 18 has taken a consistent position on the Salt Lake Boulevard vs. Kam Highway alternatives. In October 1989, the Board voted 7 to 2 in favor of the Salt Lake Boulevard alignment. A telephone poll of the members in preparation for tonight’s meeting indicates, after a review of the additional information provided in the Alternatives Analysis and Draft Environmental Impact Statement, that the position of the Neighborhood Board No. 18 on the issue has not changed. The issue for us comes down to ridership and level of service.
The nearest park-and-ride facility is Aloha Stadium. If the Kam Highway alignment is chosen, area commuters will have to proceed in the east direction on Salt Lake Boulevard to get to the park-and-ride facility. They would therefore have to go in the opposite direction from downtown in order to use the rapid transit system. This wouldn't make very much sense and will do a lot to discourage rapid transit ridership in this area. Three public schools -- Aliamanu Elementary, Aliamanu Intermediate and Radford High School -- are all located along Salt Lake Boulevard. I can easily foresee a huge traffic snarl along Salt Lake Boulevard for area residents trying to get to the schools and the rapid transit stations. Salt Lake is one of the densest neighborhoods on the island. 60,000 people live in Salt Lake alone. Witness every morning that the roads in this area do not have sufficient carrying capacity to handle the present total population. Making people drive to Aloha Stadium or take shuttle buses to the stations is not going to reduce the number of vehicles on the road, nor is it going to mean much rapid transit.

I also question which population the Kam Highway alternative will really serve. Rapid transit stops at the Arizona Memorial, Makalapa Gate, Honolulu International Airport, and Lagoon Drive, are the proposed stations. Leeward Oahu residents who work at Pearl Harbor relatively do not have much of a traffic problem getting to work in their private automobiles at present. Even if Leeward Oahu residents took the rapid transit system to work, they would still have to find a way to get to their job sites on-base from Makalapa Gate. Pearl Harbor is a sprawling complex and getting off at Makalapa Gate will not really solve the transportation problems of Pearl Harbor employees. I do not see what incentive they would have to take rapid transit to work. There is also not a large enough population of military dependents living in the Pearl Harbor area who need to get downtown to work in the morning and home from downtown in the afternoon to justify the longer route, longer travel time and higher costs of the Kam Highway alternative.

With regards to the airport, your own study shows that Honolulu has fewer business travellers to the airport than mainland cities and that vacation travellers do not take rapid transit because of the amount of baggage they take with them. So who and how many will the airport station really serve? How many jobs will we lose?

In supporting the Salt Lake Boulevard alternative, Neighborhood Board No. 18 believes that the majority of Salt Lake residents will walk to the proposed rapid transit station diagonally across the Salt Lake Shopping Center. As previously mentioned, Salt Lake is densely populated and compact, with a majority of residents within a 1-mile radius from the proposed rapid transit station site.

If reducing our automobile population is one of your goals, if reducing travel time is one of your goals, if getting the highest ridership is one of the rapid transit system's goals, then the Salt Lake Boulevard alternative makes a lot of sense.
A word of caution however. We however take on faith the statement made in the Draft EIS document on page S-32: "The noise analysis concluded that all noise impacts could be successfully mitigated with any of the technologies under consideration." Neighborhood Board No. 18 would nevertheless like to urge that of the four technologies under consideration, the technology with the least noise impact to be the preferred technology.

On behalf of the Board, thank you for the opportunity to express a preference on the rapid transit alignment for our area.

Very truly yours,

REYNALDO D. GRAULTY
Chairman, Neighborhood Board No. 18
TO:       BENJAMIN B. LEE, DIRECTOR
          DEPARTMENT OF GENERAL PLANNING

FROM:     KAZU HAYASHIDA, MANAGER AND CHIEF ENGINEER
          BOARD OF WATER SUPPLY

SUBJECT:  ALTERNATIVES ANALYSIS AND DRAFT ENVIRONMENTAL
          IMPACT STATEMENT (DEIS) FOR THE HONOLULU RAPID
          TRANSIT DEVELOPMENT PROJECT, HONOLULU, OAHU

April 27, 1990

Thank you for the opportunity to review and comment on the
Alternatives Analysis for the proposed project.

Our previously stated concerns regarding dewatering, in
addition to other project related impacts to the
groundwater aquifer along the proposed routes appear to
have been adequately addressed.

The review of the construction plans should be coordinated
with our Planning and Engineering Division to minimize
potential conflicts with our facilities once the final
alternative is chosen.

If you have any questions, please contact Lawrence Whang
at 527-6138.

Cc:  Amar Sappal, DTS
May 23, 1990

MEMO TO:  BENJAMIN LEE, CHIEF PLANNING OFFICER
          DEPARTMENT OF GENERAL PLANNING

FROM:  HERBERT K. MURAOKA
        DIRECTOR AND BUILDING SUPERINTENDENT

SUBJECT: ALTERNATIVES ANALYSIS/DRAFT ENVIRONMENTAL
          IMPACT STATEMENT (AA/DEIS) FOR HONOLULU
          RAPID TRANSIT DEVELOPMENT PROJECT

We have reviewed the subject AA/DEIS and have no comments to
offer.

Should there be any questions, please have your staff
contact Richard Masuda at 527-6370.

                 HERBERT K. MURAOKA
                 Director and Building Superintendent

RM: jo
cc: J. Harada
    A. Sappal, Transp. Services Dept.
    RTDD
TO:       AWAR SAPPAL, PROJECT MANAGER  
          RAPID TRANSIT DEVELOPMENT PROJECT  
          DEPARTMENT OF TRANSPORTATION SERVICES  
          CITY AND COUNTY OF HONOLULU

FROM:     LEIGH-WAI DOO, COUNCILMEMBER

SUBJECT:   COMMENTS ON THE HONOLULU RAPID TRANSIT DEVELOPMENT  
           PROJECT ALTERNATIVES ANALYSIS AND DRAFT ENVIRONMENTAL  
           IMPACT STATEMENT

May 21, 1990

I am writing to express my comments and questions concerning  
the Alternatives Analysis and Draft Environmental Impact  
Statement, dated March 1990, for the proposed Honolulu Rapid  
Transit Development Project.

One of my principal concerns involves the broad issue of how  
we can best use our major investment in any mass transit system,  
particularly a fixed guideway system, to achieve our overall  
planning and development objectives. Naturally, many of those  
planning objectives involve transportation policies for moving  
people safely, efficiently and at a reasonable cost. However,  
other planning policies must also be addressed like encouraging  
the full development of the Primary Urban Center as well as  
encouraging the redevelopment in Kakaako and along the major  
corridors in Kalani.

Thus, how will each of the proposed transit stations  
stimulate the positive redevelopment of its surrounding area to  
help implement our city plans and policies? In addition, how may  
the proposed transit alignment (away from the stations)  
contribute to the degradation of our neighborhoods in  
contravention of our plans and policies? What is being done or  
being proposed to maximize the former and to minimize the latter?  
Finally, how will the positive redevelopment surrounding the  
proposed transit stations favorably affect the projected  
ridership on that corresponding alternative transit alignment?

I am also concerned about the proposed terminus for the full  
length alternatives. What facilities are being proposed for each  
terminus and how will those stations (including the Isenberg  
transit station) be integrated into the transportation network  
and Kapahulu station
which will feed into them? How would the full length fixed guideway alternative be extended at some later date and what facilities and expenditures are currently being proposed to accomplish it?

I understand that after the selection of a locally preferred alternative, the next project phase will be a Preliminary Engineering/Final Environmental Impact Statement phase in which the design, costs, financing and impact analysis will be refined. However, once the city has designated its preferred alternative, how and under what circumstances could an applicant, landowner or developer seek an alignment modification or a station siting modification to either minimize the project's adverse impacts or to maximize its utility? How will those applications be processed and when will they be reviewed by the City Council?

Finally, I have several comments concerning the critical comparison of Alternative Alignments #3 (Kamehameha Highway/Hotel) and #4 (Salt Lake/Hotel) between Aloha Stadium and Kea'au Interchange. Do the visitor ridership projections for Alternative #3 adequately account for the fact that Oahu's principal hotel precinct (Waikiki) and one of Oahu's principal visitor destinations (the Arizona Memorial) would both be conveniently served by this fixed guideway alignment? I note with some surprise that the total daily volume of arrivals and departures at the proposed Arizona Memorial Station would amount to only 800 (i.e. 400 visitors to and fro) which is significantly below that of any other station on any other alignment. Although this seems to be a small fraction of the real potential use of this station, assuming that these projections are accurate, wouldn't it make sense to eliminate this underutilized station to save money ($10.66 million) and to save transit travel time (over 30 seconds). Please double check the visitor ridership projections and, if confirmed, would you please reanalyze Alternative #3 without the proposed Arizona Memorial Transit Station.
May 23, 1990

TO: AMAR SAPPAL, PROJECT MANAGER
RAPID TRANSIT DEVELOPMENT PROJECT
DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

FROM: GARY GILL, CHAIR
COMMITTEE ON ECONOMIC DEVELOPMENT
AND TRANSPORTATION
CITY COUNCIL

SUBJECT: COMMENTS ON RAPID TRANSIT PROJECT AA/DEIS

The following are my personal comments on the Alternatives Analysis and Draft Environmental Impact Statement: Honolulu Rapid Transit Project (AA/DEIS). Please be advised that the comments are my own and are not a reflection of sentiments of the Council or Transportation and Economic Development Committee. The comments include requests for additional information and questions on certain statements and data.

Observations

Three general observations are offered as a preface to place the comments in perspective.

First, the cost-effectiveness of the rapid transit system should be based on the benefit to a broader segment of the population than "new transit riders" or even all transit riders. The cost of the system will likely be borne by all residents of Oahu, but the benefit may not be fairly shared. Although the Urban Mass Transportation Administration bases a "new start" funding decision on its total cost-effectiveness index, local officials and the public, who will bear the majority of the cost, should have the capability of assessing cost-effectiveness by other methods. The capability is especially important for local officials, who have a duty to all residents and must judge the alternatives in the context of overall cost and benefit and impact on other public programs.

Second, the traffic reduction effect of the rapid transit system should be set forth more clearly. While some discussion
of vehicle trip and auto trip reductions is included in the AA/DEIS, data on amount, period, and location of traffic reduction are generally insufficient.

Third, the TSM alternative should have been expanded to include a dedicated busway. Notwithstanding UMTA's prohibition on major transit capital improvement in the TSM alternative, formulation of a practical and feasible expanded bus/busway concept would have allowed more meaningful comparison of the mode choices. Although the contention is made that busways have been studied in the past, those studies are at least ten years old and may not have reflected the best expanded bus/busway concept.

Chapter 1 -- Purpose And Need

(1) On page 1-7, the decline in bus operating speeds is discussed. To place the discussion in better perspective, the manner in which operating speeds are calculated should be noted, as is done for table 1.2.

(2) Table 1.3 provides data on morning peak hour traffic conditions at key analysis screenlines. To give the public a better understanding of the impact of the rapid transit system, the table should be expanded to include the following:

(A) Data on all screenlines in the Hali study.

(B) Preliminary projections for 2005 from the draft Hali 2005 study, under preparation by the Oahu Metropolitan Planning Organization (OMPO).

(3) In section 1.2, the conventional Urban Mass Transportation Administration (UMTA) "new start" planning and development process is described. A brief discussion should be added on the relationship of the UMTA process with the City administration's plan to issue a request for proposals for the rapid transit system.

Chapter 2 -- Alternatives Considered

(4) On page 2-3, the assumed fare structure is set forth. A statement should be added that fares are adjusted for inflation in the analysis of future revenues.

(5) Figure 2-1 denotes exclusive transit lanes on Beretania Street, King Street, Alakea Street, Kapiolani Boulevard, and Kalakaua Avenue. An explanation of the manner of operation of the exclusive transit lanes should be added to the narrative.

(6) Page 2-5 states that alternative 2 does not include "major capital transit projects." Thus, a dedicated busway is not considered under the alternative. It is noted, however, that the Makai Viaduct is operated as a reversible HOV facility, similar in concept to a busway between Middle Street and Downtown.
(7) Table 2.1 displays the average number of buses per hour arriving and departing key service areas. The service areas do not correspond to the transit analysis districts used for trip table purposes. Setting forth the data by transit analysis districts, rather than service areas, would be desirable, but not absolutely necessary.

(8) More information on the bus operating plans of the alternatives should be provided. Appendices of the "Final Definition Of Alternatives" and "Operations And Maintenance Cost Results Report" contain information valuable to local officials and the public. At minimum, the following information should be provided for each line listed in tables A-2 and A-3 of the "Final Definition Of Alternatives": service area; peak period headway; peak route time; route miles; and peak vehicles required. In addition, an appropriate number of maps showing the route of each bus line should be included.

(9) On page 2-10, the bus service for the fixed guideway alternatives is described. A statement should be added to note the termination of the Hawaii Kai express route at the Ala Moana Center, and not Downtown.

(10) Figure 2-4 denotes the fixed guideway alternatives' transit service areas for trips to Downtown. A brief justification should be provided for the busing directly to Downtown of residents from the following areas:

(A) Palolo Valley.

(B) The area Koko Head of Halawa Heights Road.

(11) A brief justification should be provided for busing residents of the following areas to a fixed guideway station, rather than directly to Downtown:

(A) Red Hill.

(B) The area of Moanalua mauka of Moanalua Freeway.

(C) Kalihi Valley and upper Kalihi.

(D) Liliha.

(E) Nuuanu.

(12) Table 2.3 lists the locations and certain characteristics of fixed guideway stations. To better comprehend the impact of feeder buses, information should be provided on whether buses will load and unload passengers from a street stop or in an off-street bus bay at each station.

(13) On page 2-48, the following statement is made: "Other technologies are available, and may possibly be implemented at a lower cost than the conventional steel-wheel/steel-rail
technology." Is it possible that other technologies may be more expensive than the steel-on-steel technology?

Chapter 3 -- Affected Environment

(14) Page 3-20 includes the following statement: "The low cost per trip results from the high density, lineal development patterns, high ridership, a lean administrative and management structure and improvements in operating efficiencies." Should "shorter trips" be included as a factor for the low cost per trip?

Chapter 4 -- Transportation Impacts

(15) On page 4-3, the components of transit travel time are discussed. Each component and its weight should be listed.

(16) To provide an opportunity for determination of cost-effectiveness using different measures, the following should be provided for each alternative:

(A) The daily hours of unweighted transit travel time for all trips, work trips, and nonwork trips.

(B) The annual hours of unweighted transit travel time for all trips, work trips, and nonwork trips.

(C) The daily hours of weighted transit travel time for all trips, work trips, and nonwork trips.

(D) The annual hours of weighted transit travel time for all trips, work trips, and nonwork trips.

(17) Section 4.1.2 discusses patronage forecasts. The discussion should summarize the forecasting methodology, with at least brief address of the following:

(A) The relationship of the OMPO person trip forecast for 2005 and AA/DEIS transit trip forecast.

(B) The recoding of trip purpose for the transit trip tables.

(C) The use of the "origin/destination format," rather than "traditional production/attraction format," for trip table development and the significance, if any, of the difference for forecasting purposes.

(D) The use of proxy zones for trip table development.

(E) The use of the combined population and employment growth factor, rather than the distinct factor appropriate to trip purpose, for trip projection and
the significance, if any, of the difference for forecasting purposes.

(18) Page 4-12 discusses peak and off-peak transit trips. No table, however, displays the number of transit trips in the peak period and peak hour under each alternative. The table should be provided.

(19) Section 4.1.2 and the accompanying tables are based primarily on all transit trips. No data is provided on the number of transit trips which include an unlinked trip on the fixed guideway. The data should be provided for each alternative.

(20) Section 4.1.3 discusses the farebox revenue in 2005. The year 2005 fares, after adjustment for inflation, should be set forth in the discussion.

(21) A comparison of travel time under alternative 2, alternative 3, and alternative 4 is desirable to provide a perspective of specific transportation impacts, to which local officials and the public may better relate. For the comparison, the best path transit travel time under each alternative should be calculated for a transit rider destined for a Downtown site and boarding a transit vehicle during the AM peak hour at the following locations:

(A) From Makaha, at the beginning of an express bus line;
(B) From the Mililani park-and-ride facility;
(C) From the Hawaii Kai park-and-ride facility;
(D) From the West Loch park-and-ride facility;
(E) From the Kapolei Village park-and-ride facility;
(F) From the Village Park park-and-ride facility;
(G) From the Wahiawa park-and-ride facility;
(H) From the Waiawa park-and-ride facility or station; and
(I) From Kailua, at the beginning of an express bus line.

(22) For additional comparison, the auto trip travel time to Downtown from the locations listed under comment (26) should be provided under alternative 2, alternative 3, and alternative 4 conditions.

(23) Section 4.2 discusses highway impacts. In general, more data should be provided to show the traffic reduction impacts of the alternatives. For example, figure 4-6 shows the reduction of auto trips under each alternative from the no-build
alternative. Data, however, is not provided on the period and location of the reductions. To better understand the traffic reduction impacts, the tables from the preliminary Hale 2005 report on traffic volumes at certain screenlines, with and without rapid transit, should be included in the AADT.

(24) The total daily auto vehicle trips should be provided in section 4.2.1 to place the auto trip reduction data in perspective.

(25) Beginning on page 4-15 and ending on page 4-23, the following statement is made: "This could amount to decreases in traffic on the order of 5 percent at key locations." The locations should be identified.

(26) Table 4.22 provides auto and bus vehicle miles traveled between Barbers Point and Koko Head.

(A) A map of the pertinent corridor should be provided.

(B) For a better perspective of the traffic reduction impact, data on auto and bus vehicle miles traveled in the entire county should be provided.

(27) Table 4.23 lists the traffic impacts at intersections near proposed rail stations. Is the data based on peak period impacts?

(28) Some discussion should be provided on the trip number and distribution differences between alternative 2 and others. Certain data in the "Transportation Impacts Results Report" are unexpected and should be disseminated for fuller understanding of the transportation impacts. For example, the matrix on page A-24 of the Report enumerates the net trips resulting from a comparison of alternative 3 with alternative 2. The matrix reveals that, in comparison to alternative 2, the rapid transit system of alternative 3 will produce less or only slightly more trips originating in Mililani, Ewa, Windward Oahu, and East Honolulu and destined for Downtown and Kakaako. That data displays the net benefit of the rapid transit system for the communities outside the corridor. Similar comparative data showing the distribution of net benefits would be of assistance in assessing the mode alternatives.

Chapter 5 -- Environmental Consequences

(29) Section 5.1.3 discusses the air quality of impacts of electrical generation. The discussion should be expanded to include the finding in the "Air Quality Impact Report" concerning the allowable PSD increments for the Kahe Point/Campbell Industrial Park area.

(30) Section 5.6.5 discusses the road traffic noise impact. The section includes the following statements:
(A) "Because there is only a slight difference in traffic volumes for the No-Build, TSM and fixed guideway alternatives, the traffic noise impact during the Year 2005 for all the alternatives is expected to be similar."

(B) "The traffic noise impact analysis indicates that, in the Year 2005, the differences in traffic volumes and the noise environment for the No-Build, TSM and fixed guideway alternatives would be insignificant."

The portions of the statements concerning traffic volumes have ramifications on assessing the transportation impacts of the alternatives. Similar statements concerning traffic volumes should be included in chapter 4 and chapter 6.

(31) Section 5.13 discusses construction impacts. Available or planned financial assistance to mitigate the construction impacts on affected businesses should be discussed.

Chapter 6 -- Financial Analysis And Evaluation Of Alternatives

(32) Section 6.1.3 discusses additional revenue sources. Scenario IV analyzes a one-half percent general excise tax in perpetuity and thirty percent UMTA funding for capital cost. The impact of the difference between that scenario and the recently passed State legislation authorizing a limited term, one-half percent general excise tax surcharge should be discussed.

(33) Table 6.7 provides data on potential additional capital funding sources. The bond proceeds column appears to be the amount of cash which must be borrowed.

(A) Is that a correct understanding?

(B) If so, the narrative should make clear that the bonds, with interest, will have to be repaid.

(C) Data on the total debt service payments required to amortize the bonds should be provided. The data should include the debt service paid after 2005.

(34) Table 6.9 summarizes the costs of the alternatives. The "Capital Cost Results Report" states that the cost for replacement buses are excluded from annualized capital cost.

(A) A brief explanation of the reason for exclusion of the bus replacement cost should be provided.

(B) If an appropriate annualization factor is possible for the cost of replacement buses, a calculation of the annualized capital cost of each alternative with the addition of the bus replacement cost would be desirable.
(35) Page 6-19 cites the "Evaluation Methodology Report." The Report mentions certain measures which would be helpful in assessing the alternatives. Data for each alternative on the following measures listed in table 3.1 of the Report would be desirable:

(A) Annual travel time cost savings to highway users.
(B) Daily work trips by auto.
(C) Annual unlinked transit trips.
(D) Daily transit passengers on fixed guideway.
(E) Automobile travel time in AM peak.
(F) Total miles of congested freeways and arterials in the peak hour.

(36) Section 6.2.3 discusses the cost-effectiveness of the alternatives. To provide alternate evaluation measures, computation and display of the following would be desirable for each relevant alternative:

(A) Cost-effectiveness, in comparison to alternative 2, per new transit rider based on unweighted travel time savings.
(B) Cost-effectiveness, in comparison to alternative 1, per new transit rider based on unweighted travel time savings.
(C) Cost-effectiveness, in comparison to alternative 1, per new transit rider based on weighted travel time savings.

(37) Table 6.19 compares the cost-effectiveness of capital and operations and maintenance costs per transit rider. The table should sum the costs.

(38) Because of reliance on general revenues to subsidize the alternatives, a cost-effectiveness based on benefits to all residents or person trips is desirable. Ideally, the cost-effectiveness of the system should be determined on the travel time savings of all person trips, rather than only transit trips.
May 18, 1990

TO: ALFRED J. THIEDE, DIRECTOR  
DEPARTMENT OF TRANSPORTATION SERVICES

ATTN: JOSEPH M. MAGALDI, JR., DEPUTY DIRECTOR

FROM: DAVID C. LAXSON, DEPUTY CORPORATION COUNSEL

SUBJECT: ALTERNATIVES ANALYSIS/DRAFT EIS FOR THE  
HONOLULU RAPID TRANSIT DEVELOPMENT PROJECT

This is in response to your request dated  
March 23, 1990 (received April 16, 1990), pertaining to  
a review by this Department of the Alternatives Analysis/Draft  
Environmental Impact Statement for the Honolulu  
Rapid Transit Development Project, Honolulu, Hawaii.  
At this time, we have no comment on this document.  
However, if legal issues subsequently arise, we will be  
available to assist your Department as requested.

DAVID C. LAXSON  
Deputy Corporation Counsel

APPROVED:

RICHARD D. WURDEMAN  
Corporation Counsel

DCL:ct

TRN9007X.RFT
MEMORANDUM

TO: ALFRED J. THIEDE, DIRECTOR
DEPARTMENT OF TRANSPORTATION SERVICES

ATTENTION: AMAR SAPPAL

FROM: ROLAND D. LIBBY, JR., ACTING CHIEF PLANNING OFFICER
DEPARTMENT OF GENERAL PLANNING

SUBJECT: ALTERNATIVES, ANALYSIS AND DRAFT ENVIRONMENTAL
IMPACT STATEMENT (EIS)--HONOLULU RAPID TRANSIT
DEVELOPMENT PROJECT

May 18, 1990

We have reviewed the subject Draft EIS and have the following comments to offer:

1. Section 1.1.2.1, City and County of Honolulu, page 1-9, should be updated to indicate that the General Plan has also been amended in 1989 and 1990.

2. Section 3.1.2.1, The Primary Urban Center, page 3-6, should be updated with the current development priorities (see attached).

3. References to the Hotel/Bethel underground station on pages 5-6, 5-13 and 5-16, should be revised to indicate that this section is likely to reinforce existing development trends (should be in middle column of Table 5.1) and straddles the boundary of the Historic Core Precinct of the Chinatown District (50 feet Kokohead of Nuuanu Avenue). This proposed station is near two other sites in the Financial District with redevelopment potential.
We recommend that a final EIS be prepared when the preferred alignment and fixed rail technology are determined.

We support the development of the Honolulu Rapid Transit Development project. It will carry out objectives of the General Plan related to transportation and is considered as the highest priority in the planning, funding and construction of public projects in the Primary Urban Center's Development Plan Special Provisions.

If you have any questions, please contact Keith Kurahashi at extension 6051.

ROLLAND D. LIBBY, JR.
Acting Chief Planning Officer

RDL:ft

Attachment

cc: Parsons Brinckerhoff Quade & Douglas, Inc.
(D) In addition to the above, special height, design, and use controls may be applied where necessary to ensure the preservation of important views, landmarks, and historic structures, and the compatibility of uses within the area.

(13) Newtown Business Park

Newtown Business Park is the industrial designated area bounded by Kaahumanu Street, the H-1 Freeway and Moanalua Road.

The purpose of the following principles and controls is to meet the demand for office and accessory retail space while maintaining existing industrial uses serving the needs of the nearby community.

(A) Commercial-Industrial Emphasis Mixed Use shall be permitted in this area.

(B) The general height limit for this area shall be 60 feet.

SECTION 32-2.3. DEVELOPMENT PRIORITIES

The planning, funding, and construction of public projects in the Primary Urban Center shall be guided by the policies set forth in Section 32-1.9 of the development plan common provisions. In addition, public plans and programs shall support the following projects in the Primary Urban Center in the priority shown:

(1) Rapid transit system and stations: including infrastructure improvements along the transit line to support expanded activity at and around transit stations.

(2) Affordable housing projects.

(3) Upgrade existing infrastructure Downtown.

(4) Industrial areas in Kalihi/Palama/Kalihi Kai.

(5) Infrastructure improvements in Waikiki.

(6) Public facilities to support a Convention Center.

(7) Honolulu Waterfront development.
MEMORANDUM

TO: Benjamin B. Lee, Chief Planning Officer
   Department of General Planning

FROM: Michael N. Scarfone

SUBJECT: Alternatives Analysis/Draft Environmental Impact Statement
         (AA/DEIS)
         Honolulu Rapid Transit Development Project

May 15, 1990

In our efforts to develop affordable housing for the citizens of the City and County of Honolulu, one of the concerns most frequently raised by the community is transportation.

We are in complete concurrence with the applicant's efforts to address Oahu's transportation needs on a comprehensive regional basis.

We are very concerned with the potential displacement of businesses due to the construction of a fixed rail transit system. The EIS notes that displacement of 50-69 businesses, employing up to 865 persons, may occur should the fixed guideway alternative be selected. We strongly recommend that all efforts be made to minimize displacement.

By way of corrections to the DEIS document, Section 5.2.2, "Relocation Assistance Program," incorrectly states the federal relocation assistance afforded to nonprofit organizations. Under federal law, nonprofit organizations are entitled to reimbursement for actual moving expenses, or a fixed payment equal to the average net income after expenses for two years, not to exceed $20,000, but at a minimum of $2,500. The Final EIS should also note that the displacing agency is required to assist the displacee in locating a suitable new location. This requirement does not require the displacing agency to locate a new location for the displacee but to assist the displacee as best it can.

MICHAEL N. SCARFONE
Director

cc: Department of Transportation Services
    Office of Environmental Quality Control
MEMORANDUM

TO: BENJAMIN B. LEE, CHIEF PLANNING OFFICER
DEPARTMENT OF GENERAL PLANNING

FROM: DONALD A. CLEGG, DIRECTOR

SUBJECT: DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) FOR HONOLULU RAPID TRANSIT DEVELOPMENT PROJECT

May 23, 1990

We have reviewed the DEIS and offer the following comments:

1. Energy Impacts (p. 5-63):

   Section 5.5.3 states that energy consumption would be about 60 million kwh per year. This averages to about 164,000 kwh per day. What is the current and projected daily electrical energy usage without the rapid transit system? What will daily usage be with the transit system in place?

   a. What will be the additional load attributable to the project at hours of peak usage? Will it create a necessity to construct additional generating capacity on Oahu?

   b. It would be useful to include in the EIS a diagram showing daily power (kw) consumption by time of day to describe the impact on hourly electrical power usage.

   c. It would also be useful if the EIS showed projected energy costs and savings from rapid transit relative to TSM and No-Build Alternatives in terms of petroleum consumption and dollars.

2. Impact on Downtown/Chinatown (p. 5-3): An important objective of the Chinatown Special District is to preserve views to the harbor. The above-grade Nimitz Highway alternatives would clearly run counter to this objective; this should be stated in the DEIS.
3. Portals in Iwilei and Kakaako: The Draft Environmental Impact Statement (DEIS) notes that portals will be an adverse visual element in Iwilei and Kakaako. However, there is no discussion of accompanying land use impacts in these two areas. How many businesses will be displaced? What are the dimensions of the portals on land uses within a quarter-mile radius of the portals?

4. Salt Lake Station: With respect to the Salt Lake station location, the DEIS notes that the "high-density Salt Lake" community is visually separated from the highway by a tall concrete visual barrier. While the proposed wall may provide a visual and noise barrier, its elevation difference will prevent walk-on ridership for Salt Lake residents. Additional housing address pedestrian access for both Salt Lake residents. Further, given the distance from residential areas, dedicated bus loading and unloading may be needed.

5. Noise Barrier Walls: The DEIS discusses the visual impacts of noise barrier walls in areas that the guideway impacts reside, including University Avenue, Kapilani Boulevard, Pohukaina Street, and Salt Lake Boulevard. Additional information on wall design, location of the walls in relation to the guideway, and possible complementary landscaping should be discussed further.

6. Mitigation-Landscaping (p. 5-36): The DEIS give specific examples of landscaping which might mitigate visual impacts. It is not clear what, if any, additional landscaping will be incorporated into an above-grade design. How will shading caused by the elevated guideway affect mitigation landscaping, and how will it affect existing landscaping around the guideway?
MEMO: BEN LEE
Page 3

7. **Stations:** The DEIS contains little information concerning station design. Future environmental review should address this subject, including integration of existing and future development, building design in relation to neighborhood character, compliance with zoning yard setbacks, and signage.

Thank you for the opportunity to comment.

[Signature]

DONALD A. CLEGG
Director of Land Utilization

DAC:s1
0338N/18-19

cc: Amar Sappal, Project Manager
RTDD, Dept. of Trans. Services
TO: BENJAMIN B. LEE, CHIEF PLANNING OFFICER
DEPARTMENT OF GENERAL PLANNING

FROM: WALTER M. OZAWA, DIRECTOR

SUBJECT: ALTERNATIVES ANALYSIS AND DRAFT EIS
HONOLULU RAPID TRANSIT DEVELOPMENT PROJECT

The draft EIS adequately describes the potential impacts of alternative transit alignments on parkland. The alignments which minimize adverse impacts on parks and urban design involve use of a subway through the Central Business District. If a subway is not a financially viable alternative, then the elevated alignments which minimize adverse visual impacts on parks and urban design follow South Beretania and Alakea Streets. The elevated alignments which follow Nimitz are the least attractive because they would create a visual barrier between the Honolulu waterfront (including Irwin Park and Aloha Tower) and the rest of the City.

WALTER M. OZAWA, Director

WMO: 11

cc: Mr. Amar Sappal, Project Manager
    Department of Transportation Services, RTDD
MEMORANDUM

TO:  BENJAMIN W. LEE, CHIEF PLANNING OFFICER
      DEPARTMENT OF GENERAL PLANNING

FROM:  SAM CALLEJO, DIRECTOR AND CHIEF ENGINEER

SUBJECT:  ALTERNATIVES ANALYSIS AND
          DRAFT ENVIRONMENTAL IMPACT STATEMENT
          HONOLULU RAPID TRANSIT DEVELOPMENT PROJECT

We have reviewed the subject document and have the following comments:

1. We have no objection to the proposed development project.

2. In the downtown and Waikiki areas, there may be conflict between the DFW utilities (sewer and storm drain) and the proposed project. Therefore, early review of utility plans to minimize utility conflicts is recommended.

           SAM CALLEJO
           Director and Chief Engineer

cc: Department of Transportation Services
May 7, 1990

Mr. Amar Sappal, Project Manager
Rapid Transit Development Division
Department of Transportation Services
650 S. King Street, 3rd Floor
Honolulu, HI 96813

RE: The AA/DEIS for the Proposed Honolulu Rapid Transit System

Dear Mr. Sappal:

This letter is to inform you that the Downtown Neighborhood Board has voted unanimously
to express its dissatisfaction with the AA/DEIS for the Proposed Honolulu Rapid Transit System.
We feel that it is fatally deficient in a variety of aspects, which I will enumerate below. Until these
deficiencies are corrected, we are unwilling to support the rapid transit system as presented.

1) The ridership analysis is unsupported by any meaningful discussion of the methodology or
the data used. Despite repeated requests for the data and models which would generate the
ridership forecasts, the Downtown Neighborhood Board has never received anything more
than generalized descriptions of the methodology. We do not trust the numbers because
we are unaware of the assumptions and calculations which produced them. Furthermore,
we have seen the blatant misuse of the projections in articles written for the press by a
representative of the City Administration. The inappropriate comparison of the ridership
projected in the AA/DEIS model with pre-opening projections in various mainland cities
leads us to suspect that the AA/DEIS numbers were concocted in order to justify the transit
system. I am attaching a copy of a letter to the Editor of the Honolulu Advertiser which
indicates that when a knowledgeable person was given the model and the data which
generated the ridership forecast, he was able to determine that "these two variables
(population and employment) are such poor indicators of transit they do not even predict
1986 bus ridership." The average error was 120%! The estimates of 1986 ridership were
more than 40% in error for more than two-thirds of the 190 transit zones. Finally, there
was less than a 16% chance that the projections would be within 20% of the actual
ridership. We read the unwillingness of the Administration to provide the data and the
model to the public as an acknowledgement of the inadequacy of the model.

One good reason for the inaccuracy, as noted by Mr. Flannelly, is the poor quality of what
are apparently the only two variables used: population and employment. They ignore
several trends noted in the 1986 ridership study upon which the rapid transit ridership
projections are based. The very first finding reported in the 1986 On-Board Ridership study
was that there had been "a decrease in 'choice' riders since the 1979 On-Board Survey..."
People on Oahu have been moving away from transit ridership as soon as they have been able to afford a car. Furthermore, work trips had decreased from 50.9% of the weekday trips in 1979 to less than 38% in 1986. This would appear to bode ill for a system designed and touted as a cure for rush hour traffic problems. Another item ignored was the fact that more than 80% of the riders did not need to transfer. This ratio was similar to that found in 1979. Yet all the alternatives shown in the AA/DEIS assume at least 27% of the riders will transfer. The rapid transit alternatives assume a transfer rate about double the percent demonstrated historically.

2) The non-rider attitude study dates to 1986 and has not been updated to consider the variety of reasons which have cropped up since then for riding in a car. Smoking regulations, car phones, privacy and personal safety did not show up in the 1986 study and may have more significance today. Furthermore, this study did not identify likely routing for non-riders. There is no statistical justification for assuming that their distribution or routing would be the same as for bus-riders. Furthermore, there is no indication of the reliability of the study.

3) We are greatly concerned that substantial effort has been put into minimizing the public impression of the physical impact of the transit facilities. At first, we were told that the stations could be fit into an intersection. Later, we were told that they were 180 feet long. There are no 180 foot wide intersections on Oahu. When pictures are presented of existing systems, they are selected to show single lines somewhere between stations or stations imbedded in commercial buildings. Only recently have we seen drawings of stations which will virtually obliterate surface light wherever they are placed. We are concerned that too little emphasis has been placed in the public presentations on the manner in which the system will affect our primary resource: our picturesque environment.

4) While the AA/DEIS presents "11 alternatives" in a pretense of thoroughness, nine of the alternatives really are simple variations on the same assumption: a billion dollar rapid transit system cast in concrete. It has totally ignored entire categories of alternatives such as "paratransit" and changes in zoning to redistribute work sites and change traffic patterns, which might meet our needs without significant public capital investment. Our impression is that the AA/DEIS set up two obviously inferior straw alternatives and then went about trying to prove that the predetermined choice, a rapid transit system, was the superior choice. No effort was made to study what might be truly competitive alternatives.

5) Finally, we believe that the AA/DEIS is a simplistic effort at manipulating data to justify preexisting decisions. No effort has been made to show how the methodology used to predict ridership in this study could be any more accurate than the ridership forecasts used in mainland studies, which are legendary for their inaccuracy. The manner in which politicians have deliberately misrepresented data in order to justify their stands further undermines our confidence. Given the risks involved, the proper choice seems to be to try alternatives which require much less capital investment and which, if they fail, can be removed from the island (paratransit) or altered (zoning changes). The capital intensive rapid transit system will always remain a possibility in the future.

Sincerely,

Andrew Rothstein, Chairman
Perils of predicting ridership

Personally, I love mass transit. TheBus provides almost door-to-door service for work-trips between my home in Waikiki and my job downtown. But, having worked in transportation planning, I know that mass transit does not have the same utility for everyone.

Earlier this year, city officials gave me some data used to make their ridership projections, so I could see how their model works. Basically, the city's model divides Oahu into 300 zones. Taking data from a 1986 survey of bus riders to estimate the daily number of people traveling to and from each zone by bus for different purposes (work, shopping, school, etc.), it uses current and projected demographic data from each zone to calculate a linear growth factor to forecast ridership for each trip purpose.

Work-trips are the largest single component of the model, comprising more than 45 percent of all transits. Two variables are combined in the model to forecast work-trips by transit - population and employment. Since the model assumes a linear relationship between these factors and ridership, it predicts that work-trips will increase proportionately with projected increases in population and employment from 1985 to 2005.

The problem is that these two variables are such poor predictors of transit they do not even predict 1986 bus ridership. When I used the model's 1985 employment and population figures to "guess" what the number of transit work-trips was for each zone in 1986, the guesses were off the mark by 20 percent, on average. The model made an error of more than 40 percent in its estimates of the 1986 work-trips in two-thirds of the 300 zones. And the odds of its predictions being within 20 percent of actual 1986 ridership were less than 16 out of 100.

If the city's model cannot predict the past, how can it predict the future? Professionally, I would prefer to bet money on some other transit alternative.

KEVIN J. FLANNELLY
TO:        BENJAMIN B. LEE, CHIEF PLANNING OFFICER
            DEPARTMENT OF GENERAL PLANNING

FROM:      DONALD S. M. CHANG, ACTING FIRE CHIEF

SUBJECT:   ENVIRONMENTAL IMPACT STATEMENT FOR
            HONOLULU RAPID TRANSIT DEVELOPMENT PROJECT

We have reviewed the subject material provided and have no additional comments.

Should you have any questions, please contact Battalion Chief Michael Zablan of our Administrative Services Bureau at local 3838.

[Signature]
DONALD S. M. CHANG
Acting Fire Chief

MZ: ny

Copy to: Mr. Amar Sappal, Project Manager
Dept. of Transportation Services, RTDD
Makiki Neighborhood Board Questions About Proposed Rapid Transit

1. The difference between the option that goes to Middle St. and the option that goes to Waiawa is only a 3% increase in ridership at a cost of nearly $500 million. How is this justified?

2. Previous methods to estimate ridership have always produced overestimates. The current method is called 'conservative', but has not yet proved itself with systems that are actually running. What is the difference between the ridership estimate using the current methodology and the previous methodologies?

3. Why has door-to-door paratransit not been included as part of the TSM option? What specific steps will be taken to change PUC procedures to encourage paratransit? When will these steps be taken?

4. It is acknowledged that the TSM option is needed in addition to rapid transit. What specific steps will be taken to increase ride sharing, paratransit, time-variable driving cost and other methods of reducing car traffic? When will these steps be taken?

5. What specific steps will be taken to mitigate the visual impacts of stations?

6. When will the feeder bus system plan be completed? How many extra buses will be required to implement it?

7. Will the State and City stop subsidizing downtown employee parking to decrease car traffic? When?

8. The methodology used to estimate the transit ridership increase by the year 2000 uses an extrapolation based on population and employment figures. However, if this same formula were used to estimate 1990 bus ridership using 1980 figures, the result would be higher than the actual result. What steps are being taken to correct this?

9. What methods are being used to allow for the fact that increasing affluence will lead to more car use rather than bus/transit use?

10. If it currently takes 30 minutes for a typical bus ride from Makiki to Downtown, how long will it generally take with an integrated bus/fixed rail system over the same distance?

11. How frequently would feeder buses stop at each stop?

12. Same question as #11 for fixed rail system.

13. What is the useful life of the planned fixed rail system?

14. Are you making provision for bicycles in the park and ride at all stations?

15. Are you allowing space for bicycles on the trains?
TO: Accepting Authority:
Benjamin Lee, Chief Planning Officer
City and County Department of General Planning

Proposing Agency:
Amar Sappal, Project Manager
City and County Department of Transportation Services

FROM: McCully Moiliili Neighborhood Board No. 8

SUBJECT: Response and Inquiries
"Alternatives Analysis/Draft Environmental Impact Statement
Honolulu Rapid Transit Development Project"

Thank you for your periodic newsletters and Mayor's Team reports on the progress of the above project. At our May 3, 1990 meeting, our Board supported a motion to ask you to respond to the following questions and concerns:

ECONOMIC DEVELOPMENT:

Is it true that there will be economic development around each station including Isenberg and University & King? If so, what type will it be, i.e., retail, offices, fast food?

Is the type of development permitted by the current zoning? If not, will they be implemented through a "zoning change" process, or by a "government waiver" process?

VISUAL IMPACT:

Where is the rail located in relationship to the trees in the median strip along Kapiolani Blvd. from McCully to University Ave.?

Given that the median strips with its trees, has been designated a 'community visual resource' by Neighborhood Board #8, if removal of any trees from this area is required to build the transit system, what type of landscaping to mitigate the rails visual appearance will be provided?

Prior to any tree removal we would like to review definite plans for replacement landscaping.
TECHNICAL QUESTIONS:

Several times in the EIS document it is stated that certain 'technical' points need to be studied (such as ways to assure that the system would be extremely quiet). N.B.#8 believes that its time to get started on such technical items NOW---noise control/abatement concerns should be resolved before final approval is obtained.

TRAFFIC IMPACT:

Where would the feeder bus routes and stops be located? Would on-street parking be affected by the system? Would there be any restrictions placed on parking along University Ave.? Would street width be affected? Is condemnation of abutting property required? Given the long and continued opposition by NB#8 and the community to any proposed University Avenue bridge connection between Waikiki and H1, would rapid transit end any attempts to place a bridge there?

OTHER:

Many of us living in the McCully-Moiliili community have looked forward to the rapid transit system as a way to get to the airport easily. Please have the system go (or build a spur) to the airport!!!

Mahalo,

Michael Shiroma, Chair

05/08
MAY 17, 1990

TO: JOE MAGALDI, DEPUTY DIRECTOR
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: LINDA "FRITZ" MCKENZIE, CHAIRWOMAN
MILILANI/MELEMANU/WAIKALANI WOODLANDS
NEIGHBORHOOD BOARD NO. 25

RE: TESTIMONY ON RAPID TRANSIT SYSTEM

I am Chairwoman of Neighborhood Board No. 25 - Mililani, Melemanu, and Waikalani Woodlands. Tonight I am testifying in support of the Rapid Transit System for Ewa at the direction of my Board.

As you probably know, Neighborhood Board No. 25 has been in support of such a system for the last several years. I believe we were the only Board that actually submitted testimony to the legislative session of 1989 and this past session also. This last year our Board, along with Wahiawa and Waipahu Boards formed a joint committee which released a joint statement of our positions. We have spent many hours listening to the Proponents and detractors of such a system. We have debated and discussed all major points and the minute; always coming back to the position of support despite the many faceted arguments for and against such a system.

We recognized the problem that has been and will be encountered in funding and implementing such a system; however, we also recognize that delay will not solve our transportation problems. The past shows us clearly that the problem will only increase with time. The time to act is now.

Hawaii, and Ewa in particular, is rapidly becoming a metropolis similar to our major mainland and world cities. With the growth and emphasis towards the East and the Pacific, we can only expect continued...
growth. A transportation system must keep pace with the needs of a community or we will find ourselves hampered by constantly having to deal with an antiquated and inadequate transportation system. We believe it would be a mistake to again delay implementation of an adequate and innovative transportation system.

We urge you to move forward with plans for the system. We would like to see the system extended to Mililani for obvious reasons; the majority of our working residents commute towards Honolulu. We certainly hope, if not initially, an extension will be in the immediate future. Alternative to a line to Mililani we would suggest that the 23 acre city owned site makai of Crestview be the chosen site for a terminus.

As an aside, I returned 3 days ago from a trip to Japan, Korea and Hong Kong. I was aghast at the growth of these countries since I last visited in 1968. I was also overwhelmed at, that despite the unbelievable growth that they, Japan in particular, are years in advance of us in addressing transportation needs. We should take note of Japan since, like us, they are an island community with limited space and astronomical land values. We should also take note of Hong Kong's successful privatation of its roads and tunnels under its harbor. I would hope we would not have to be faced with the massive congestion akin to that of these countries without adequate preparation and planning for adequate and progressive transportation systems. Japan, even with its model systems, strains to solve the massive traffic jams, not to speak of our own American cities which have poorly planned systems and inadequate systems. In Hawaii, we again have the opportunity to move ahead of these problems.

I urge you to please act now and give our community the innovative and necessary system it needs to carry us into the 21st century.
May 23, 1990

Mr. Benjamin B. Lee
Chief Planning Officer
DEPARTMENT OF GENERAL PLANNING
City & County of Honolulu
650 South King Street, 8th Floor
Honolulu, HI 96813

Dear Mr. Lee,

Re: Draft Environmental Impact Statement (EIS)
Alternative Analysis for the
Honolulu Rapid Transit Development Project

This is to inform you that the Pearl City Neighborhood Board No. 21 voted unanimously, 9-0-0, at its April 26, 1990 regular meeting, to submit the following concerns associated with the above-mentioned draft EIS. Please be advised that our input is confined to the proposed alignment in the Pearl City-Aiea area of Oahu:

1. Provide more details on the plans for the park and ride facility at Leeward Community College (LCC), including security measures to protect vehicles from being vandalized or burglaried.

2. Provide more details on the design of the three-story transit/terminal structure at Pearl City Shopping Center, as view planes may be seriously impacted.

3. Provide details on the design of the transit station at Pearridge Shopping Center.

4. Include more detailed discussion of mitigative measures for the following items:

   a. Increased congestion and transitional impacts to be created when feeder bus service is combined with peak hour traffic at the transit stations on Kamehameha Highway.
b. Potential impacts to be created when private off-street parking stalls located on commercial and industrial properties adjacent to the transit station and on-street parking spaces are utilized by rapid transit passenger drivers.

c. Provisions for the elderly and handicapped to enjoy unencumbered access to the third levels of the transit stations.

d. Provisions for free parking to be included in the cost of the round trip fare at the LCC park and ride facility.

Your response and appearance by Department of Transportation Services staff members at a future Board meeting to address our concerns will be appreciated. Please accept our apologies for the late submittal of our recommendations on this very important matter.

Very truly yours,

Albert K. Fukushima
Vice Chairman

cc Amar Sapal, DTS-RTDD
Councilmember Arnold Morgado
N Commission
TO: BENJAMIN B. LEE, CHIEF PLANNING OFFICER
DEPARTMENT OF GENERAL PLANNING

FROM: HAROLD KAWASAKI, CHIEF OF POLICE
HONOLULU POLICE DEPARTMENT

SUBJECT: ALTERNATIVES ANALYSIS/DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HONOLULU RAPID TRANSIT DEVELOPMENT PROJECT

May 16, 1990

In general, the proposal for the Honolulu Rapid Transit Development Project appears to contain adequate provision for public safety and security. We realize that more specific plans can be made only as the project is given further definition.

Thank you for the opportunity to comment.

HAROLD KAWASAKI
Chief of Police

By
JOSEPH AVEIRO
Assistant Chief of Police
Support Services Bureau

cc: Mr. Amar Sappal.
Testimony Before the City Department of Transportation Services

May 8, 1990

The consensus of the Waikiki Neighborhood Board is that the proposed transit guideway along Kuhio Avenue would be a detrimental environmental impact for Waikiki. Any form of rapid transit proposal in Waikiki must be carefully considered within the context of a Master Plan. On May 1 our Board voted unanimously to support the Queen Emma Master Plan as a model conceptual document to address long-range Waikiki Special District Planning strategies and considerations. The adoption of Councilman Neil Abercrombie's Resolution 90-117 calling for the creation of a Joint City-State Waikiki Planning Group would provide a forum for the deliberation of transportation alternatives within Waikiki that would be compatible with the Hawaiian ambience that tourists and residents alike enjoy. A possible alternative to the Kuhio Avenue transit proposal would be the reconsideration of an Ala Wai Canal Rapid Transit Spur. This concept could fit in nicely with proposals to extend and beautify the Ala Wai Promenade. Also a cleaned up and rejuvenated Ala Wai Canal could become a top tourist attraction and could link to water transportation possibilities from Waikiki to the airport. Another plus for a possible Ala Wai Spur would be that it would encourage people densities to be dispersed from the Kalakaua and Kuhio Corridors to the Ala Wai area.

To protect, preserve and improve Waikiki's Hawaiian tropical atmosphere, let's keep rapid transit off Kuhio Avenue.

Our Board would also like to convey some warnings. The possible implementation of a rapid transit system for Oahu is not the magic solution for our problems of traffic congestion. Our government needs to enact policies to control
The number of registered vehicles, remove the thousands that are unfit to be on the road, limit the number of vehicles per household, check driver registration and licenses for validity, designate more effective express bus routes, as well as better assigned entrances and exits to major areas. If the pattern of unlimited continued growth is allowed to persist, any rail system will be obsolete before completion.

To get people out of their cars and onto rapid transit will be a formidable challenge. The independence and convenience the automobile provides are reasons enough to see that people will not readily give up driving and turn to public transportation.

In closing, let's not obstruct view planes any further or close the door to enhance the pedestrian experience along Kuhio Avenue with the permanent interference of a rapid transit system.

Thank you for the opportunity to testify.

Most sincerely,

Anita Benfatti
Chair

Waikiki Neighborhood Board
TESTIMONY
Relating to Mass Transit

Submitted By:
Annette Yamaguchi
Chair/WNB #22
Chair/Waipahu "Can Do" for Kids Youth Gang and Drug Task Force

The Waipahu Neighborhood Board has taken a firm position in support of Mass Transit. The concept of a Mass Transit system has been around for many years and this State has continued to find reasons and situations to not go with the system. If we had built the system years ago the costs would be millions less than it is today so lets not wait any longer to make Mass Transit a reality in Hawaii.

Mass Transit has been cited as not being successful in cities on the mainland. Most cities on the mainland are not built in a reasonably straight line as we are here on Oahu. Cities on the mainland have many out of reach communities so the feeder system can not work as adequately as it could in this State. The work place is spread out over a much larger land area than Oahu. So, to compare Oahu's Mass Transit to other cities is like comparing apples and oranges.

The route and how the Transit System should be built should be left to the engineers and experts that have been studying the system for years. There have not been many issues that have had as many studies, questions, and input as our Mass Transit system. With the guaranteed federal dollars and the dedicated source of funding that came from this legislative session, lets not now give this entire issue a flat tire and delay the process. Lets build the system!

Thank you for allowing me the opportunity of testifying in favor of getting the Mass Transit System on rails.
4.0 OTHER LOCAL GOVERNMENTAL AGENCIES
MEMORANDUM

Date: May 31, 1990
From: Laureen Brennan, OMPO Planner
To: Bob Sumitomo
Subject: CAC Results of Questionnaire on Rapid Transit Transmitted May 23, 1990

Please make the following correction to the comments of the Tax Foundation of Hawaii.

Page 3. (Other Comments) - Last Sentence should read;
"...The Tax Foundation does not believe an increase is warranted."

Also, we received the attached testimony and comments from the Waikiki Improvement Association and are forwarding them for your information.
Good evening, I am Christina Kemper, President of the Waikiki Improvement Association. The Waikiki Improvement Association is a private non-profit organization devoted to preserving and improving Waikiki. It is an organization that is 300 members strong and is recognized as an effective voice for improving the quality of life in Waikiki for visitors and residents alike.

In October 1989 the "Waikiki Tomorrow" Conference, supported by the Waikiki Improvement Association and the State of Hawaii brought together for the first time over 400 concerned community leaders to map out what will be necessary to maintain and create an even better Waikiki. These leaders - from business, labor, government and resident organizations represented a broad cross-section of Oahu and State interests. The concept of mass transit emerged as a primary concept which all members could support. In January of 1990 the Waikiki Improvement Association adopted a resolution which "promotes the principle of mass transit as a major factor in solving Waikiki's transportation and congestion problems."

The Waikiki Improvement Association supports fixed guideway technology and the routing alternative which connects Waikiki to the Honolulu International Airport and to Pearl Harbor.

Such a system would provide the following positive solutions:

1. Reduce street congestion by encouraging parking outside of Waikiki for commercial and entertainment activities.

2. Increase available land for pedestrian amenities, such as wider sidewalks, additional landscaping and increased space for services.
3. Reduce bulk density by eliminating the need for bulky parking structures for commercial and residential properties. Parking accommodations are typically the lower, bulky part of buildings covering all or most of the lot all the way to the sidewalk at street-level. Reducing cars and parking requirements can thereby reduce the apparent density and allow for more open space where it counts most—on the sidewalk. This was a principle finding and call to action of the "Waikiki Tomorrow" Conference in October, 1989.

4. Decrease the necessity for Waikiki residents to rely on personal automobiles to transact business and participate in community activities.

5. Enhance the visitors' likelihood of increased island-wide participation in the cultural, educational, social, athletic and religious activities of Honolulu.

6. Provide Oahu residents hassle-free access to all entertainment and food and beverage facilities in Waikiki.

7. Reduce the travel time from Waikiki to Downtown by 14 minutes.

8. Reduce auto vehicle trips by 42.6 per cent.

A mass transit system with proper feeder elements could significantly integrate all the resources of Oahu with Waikiki and vice versa. It would give a tremendous boost to the quality of life in Waikiki and Honolulu. Waikiki is not only an important economic contributor to the State. It is an important social contributor to the quality of life for all in Hawaii. It would be the cornerstone from which all other improvements can be built upon.

Thank you for allowing me to testify on this important project.

Attached for your reference is a copy of the W.I.A. Vision Paper written by Donald Y.W. Goo, FAIA: Chief Executive Officer, Wimberly Allison Tong and Goo.
WAIIKIKI -- WHAT NEXT?

By: Donald W.Y. Coo, FAA

'What Next?' implies that there is a present--a now. It implies a vision--a future. Waikiki is the state's golden egg.

To manage Waikiki, we should 1) understand its strengths and its weaknesses; 2) have a vision that creates Waikiki as a special place; 3) identify key solutions that will spark many complementary activities; 4) develop an economic strategy; and 5) because of Waikiki's importance to all residents, involve everyone in the community to embrace the strategy.

ASSESSMENT

Waikiki's greatest assets are the concentration of these features:

1. Restaurants
2. Entertainment
3. Hotel Rooms
4. Meeting Spaces
5. Good weather that allows everyone to enjoy outdoor recreational and educational activities, as well as walking around.
6. A multi-cultural community.

The concentration is enhanced by the laid-back attitude of the people of Hawaii, which is reflected in the Aloha Spirit that continues to shine.

What are Waikiki's major problems? Its major problems are focused on crowding--the concentration of too many cars on the streets, too many cars and trucks illegally parked, too many people on narrow sidewalks, too much building, too many signs, not enough parking spaces, not enough landscaping, not enough lighting for security, and not enough open space.

The major solution to Waikiki's problems should focus on solving the automobile and the open space problem.

Vision

It can be a distinctive world-wide visitor destination that features a year round climate for walking around to see a blending of Pacific cultures and to enjoy indoor/outdoor activities.

Waikiki is an urban resort and should be integrated with its surroundings, enhanced and improved. Waikiki cannot be Poipu, Kauai with its lower density, low-rise buildings, etc. The major focus for Waikiki's tourism future should be in attracting conventions and tour groups that will learn about their business, meet their colleagues, and learn about Hawaii's multi-
racial culture. Our residents of Waikiki will choose this community because of these attributes.

The promotion of Waikiki should clearly emphasize its assets. Future public improvements and developments should be complimentary to these efforts. These improvements and developments should be encouraged so that in ten years (the year 2000) Waikiki will be what we are discussing today. That's what a developer of Waikiki would do. That's what the Waikiki Improvement Association should do. That's what the City and County of Honolulu should do.

Solutions

Two concepts emerged from the Waikiki Tomorrow Conference on which all the others could support mass transit and a special management group for maintenance. These two concepts would have a significant, favorable impact on the future development and total lifestyle of Waikiki. They would affect the existing and future physical environment (including development), the social and cultural environments, and economic growth of the area. They have in common their potential influence on other proposed solutions, both short- and long-term. Implemented, the effects of mass transit and special management of Waikiki would be phenomenal. If they are not implemented, many other possible solutions will be impossible to achieve or considerably compromised.

The first concept—mass transit and its feeder elements—recognizes the profound influence of transportation on the economy, on the physical environment, and on the way people work, play and feel.

Convenient transportation into, out of, and within Waikiki would do much to change Waikiki, in the eyes of residents, from a place to avoid, to a place to enjoy. The easier and more pleasant the "getting around" experience, the more visitors will explore and utilize facilities and attractions. Probably three-quarters of the proposed solutions to problems of Waikiki's physical plant and zany proposed solutions for improvements for social and cultural elements, as well as the economic development of Waikiki, are tied to an efficient transportation system for Waikiki and beyond. Such a system would provide the following solutions:

1. Reduce street congestion by encouraging parking outside of Waikiki for commercial and entertainment activities.

2. Increase available land for pedestrian amenities, such as wider sidewalks, additional landscaping, and increased space for services.

3. Provide Oahu residents hassle-free access to all entertainment and food & beverage facilities in Waikiki.
4. Enhance the visitor's likelihood of increased island-wide participation in the cultural, educational, social, athletic, and religious activities of Honolulu.

5. Decrease the necessity for Waikiki residents to rely on personal automobiles to transact business and participate in community activities.

6. Eliminate the need for parking for commercial activities and reduce the number of parking stalls required for residential properties--which would eliminate or minimize the building bulk for parking and, by minimizing parking requirements, decrease the cost of development.

7. Increase open space and views toward mountains and ocean, lessen the feeling of congestion, and provide more light and more room for landscaping.

A mass transit system with its proper feeder elements could significantly integrate the entire resources of Oahu with Waikiki and vice versa. It would, in effect, give a tremendous boost to the quality of life in Waikiki and Honolulu.

Other proposals--such as controlling building height, improving signage, enlarging beaches, and so on--would indeed enhance the development of Waikiki. A major mass transit system, however, would be the cornerstone from which all other improvements can build upon.

The second concept recognizes the necessity of a continuum of appropriate action in order to sustain the benefits of capital and other improvements. Structured on a special management of physical, social, and cultural aspects of the environment by an organization specifically selected and dedicated to this effort and minus the normal bureaucratic city administration.

This concept entails creation of a public/private development/maintenance group that could continuously enhance the day-to-day experience of life in Waikiki. This authority should include personnel who currently have responsibility for Waikiki. It would foster a safe, clean and good looking Waikiki; keep it smoothly operating 24 hours a day; and cater to the concerns of both visitors and residents. Waikiki is the center piece of Hawaii's visitor industry and also the home of several thousand residents. The area requires a unique and specialized management effort to provide services sensitive and responsive to both the visitor and the resident.
These concepts would work synergistically towards the building and perpetuation of a truly people-pleasing place that would perform splendidly as a visitor destination area and as a place to live. The many facets of Waikiki could function with distinction, pleasing those who spend time there and setting an outstanding example to the world.

Economic Strategy

The funding of solutions is usually the major stumbling block in all good suggestions. "Who is going to pay for the good ideas?" is followed by, "How much will it cost? You can have it if it doesn't cost anything." One solution would be for the improvements to be paid by public money; that is, through our taxes. If it's taxes, does it come from existing tax revenues? Can we earmark a portion of the hotel room tax? How much of it can be used? Everyone is looking to the surplus state revenues to fund other state or community programs and expenses. Will the state turn over some of these funds to the county for improvements? Will the state joint-venture new Waikiki improvements similar to the recently completed Kalakaua Avenue Improvement project?

A pragmatic, wouldn't rely on current tax income for the proposed improvements despite the fact that this source of money would have the least amount of impact on all residents and visitors. It may be difficult and/or time consuming and the results unpredictable.

The alternative would be to increase tax revenues by increased development opportunities or by a combination of public/private sponsorship of the improvements. In either case, incentives to contribute funds for improvements would come from changes in density for developed properties; reduced parking requirements; tax credit investment; and building height.

The incentives should increase 1) land value; 2) real property taxes; 3) new development; 4) redevelopment; 5) increase open space/landscaping; 6) increase demand for mass transit; 7) increase income taxes; and 8) increase the feasibility of development. The resultant increase in taxes, which would be over and above the normal increases in tax revenue through inflation, would be insufficient to pay for the proposed Waikiki improvements.

Implementations of services and special maintenance of Waikiki should be by a partnership between government and private enterprise. A major percentage of the funds for this should be from government and a major percentage from all Waikiki owners by an assessment of a percentage of their property value. This assessment would be by only to commercial properties, not residential properties.
The development of a transit system that services Waikiki should be at the cost of the general public because of the common value that it accrues to the entire county and state. Revenues for this development would come from increased growth in tourism.

ENVIRONMENTAL IMPACT

The general environmental impact of an increase in Waikiki's visitor industry will be more visitors in a place that can accommodate them. Waikiki's visitors will have more area of sidewalk/visitor, more open space and landscaping/visitor, better accessibility to and from Waikiki for visitors, residents and employees. It will be better maintained and will look more attractive.

A higher density should be permitted on existing fully-developed property in exchange for more open space and landscaping at ground level. Properties on the beachfront which are fully-developed should be encouraged to redevelop with more open space, landscaping and higher building heights. Examples of the increased open space are the Liliuokalani Garden Apartments, Royal Hawaiian Shopping Center and Hilton Hawaiian Village. Development without parking requirements would not add to auto traffic or building bulk and would create more landscaping and increase financial feasibility by eliminating the development cost of parking.

A better physical environment including cultural activities will enhance everyone's feelings. A smile on everyone's face must be an environmental plus.

Community Involvement

Waikiki belongs to everyone. What is good for the tourist is good for us and what is good for us is good for the tourist. We are one. The vision of Waikiki must be a place for all of us to enjoy. It should not be a zone for visitors. It must not overwhelm us. There must be a balance of our involvement to redirect Waikiki to be a better place. To improve Waikiki, we must involve everyone because Waikiki affects everyone.

15 December 1989
Funds are clearly available for visual materials intended to sell the project. Notably, and not surprisingly, the television ads intended to generate public support for a rapid transit system feature aerial shots of monorail type trains running through a broad greenbelt area. The spot shows the lightest technology and offers a perspective and a condition that does not exist along any of the urban routes under study.

3. Impact on Areas Traversed by Transit Routes. The impact of transit routes and existing neighborhoods is consistently underestimated and impact on planned and existing new projects and positive development trends that are well advanced is frequently ignored.

A. Downtown Area. Due to the high acoustic, visual and psychological impact of elevated rail lines, the underground routing along Hotel street is the most acceptable downtown route. The Beretania/Aloha route is not a viable alternative, and the Nimitz route should be considered only if a relatively low impact monorail system were chosen. Even with lighter monorail technology, the proposed stations would have a devastating impact on the Aloha Tower Development project, and create a profound psychological and physical barrier between the downtown business district and the harbor. The impact of the existing bus ramp as an inappropriate presence and a physical and psychological barrier at piers 5, 6, 7, & 8 would pale in comparison to the effect of the proposed station at Irwin Park. The report notes that views of Irwin park would be "partially obscured" (pg. 5-36) by the Nimitz/Fort Station and refers the reader to illustrations 5.61 and 5.62 which clearly show that the view would be virtually obliterated by the station. The report then suggests that the park would not be affected if the station were located in the middle of the street or on the Mauka side of Nimitz.

The EIS cites the existence of the traffic ramp and of the Hawaiian Electric plant as ameliorating the impact of the Nimitz route on makai views from Bishop, Aloha, and Richards street since these views are already "broken" by the ramp and power plant. Aside from the fact that these structures are slated for removal in the reasonably near future, it is interesting that the bus ramp is seen a breaking the makai view along Nimitz (pg. 5-35) while the elevated transit line apparently would have "minimal impact" on the makai edges of Chinatown and the Merchant Street Historic District (same page). Where elements such as the power plant are not present to justify the guideways impact the report suggests that "landscaping would be incorporated into the design of the fixed guideway" (pg. 5-36), and that "interested agencies and the public would be encouraged to review the proposed landscaping"
plans and provide input." As architects with some experience in this area, we would like to suggest that it will be somewhat difficult to "plant out" an elevated guideway system that will require up to 10 miles of 4 foot sound barriers for noise abatement.

The EIS clearly favors the Nimitz alignment over the Hotel Street underground routing. Criticisms of the Hotel Street route center on a "level of construction uncertainty, and implementation problems" that are not defined, and on the fact that passengers on this route could not see out of trains. The psychological impact of the Nimitz route and stations is not considered, visual impact is severely understated, and the noise effect on planned projects is ignored. The analysis of the impact of the Beretania route suggests that stacked lines at 25 and 45 feet in the air will "visually blend with the existing street wall" (pg. 5-33). This level of analysis is disingenuous at best and completely inadequate in addressing the impact of elevated transit lines on the areas they traverse.

B. Kakaako. Similar shortcomings are found in the report's consideration of routes through Kakaako, where it is suggested that the due to "the existing deteriorated condition of many buildings used for light industrial and automotive related activities, the elevated guideway and any associated redevelopment would not have a negative effect on the area." (pg. 5-33) The rapid, and much publicized, upgrading of Kakaako as a high end residential and commercial area is completely ignored and no mention is made of the tremendous potential of Kakaako Peninsula or of ongoing plans to improve that area. This level of analysis is perhaps not surprising given that the aerial photo used in analyzing routing through the Kakaako areas is so old that it shows the ironworks on the site of the new waterfront plaza/restaurant row complex. (Sheet 21 - Plan and Profile Dws.) The same sensitivity that is needed in planning routes through the downtown area is needed in developing the Kakaako routes where a large number of residential units will be affected and where there are real opportunities to coordinate routing with positive area development trends.

C. Waikiki. The analysis of the impact of routes in Waikiki is similarly inadequate. The report states that a guideway down Kuhio "would not significantly affect the area's strong aesthetic diversity of built forms" (pg. 5-56) although it apparently would affect "the visual setting of the Kuhio Theater". (same page). "Photographic documentation of the theater prior to guideway construction, (it is suggested), would be a measure to mitigate impact." (pg. 5-76)
With Kuhio Avenue as the only proposed Waikiki route we believe that anything heavier than a monorail system is unacceptable, and that any kind of elevated stations would have a significant negative impact on the area. If a heavier system technology is chosen for the main line, a lighter secondary system, perhaps similar to the Darling Harbor system in Sydney, Australia should be used to serve Waikiki, with the main line bypassing the area of kept underground.

D. General. In sum, the analysis of routing impacts is inadequate for all of the urban core areas assessed by the study, including specifically the downtown area, Kakaako and Waikiki, and that the best routing approach for the future of these rapidly upgrading areas would be an underground route all the way from downtown through Waikiki. An alternative would be the use of secondary loop systems using lighter technology to serve the downtown area and Aloha Tower, Kakaako and the Kakaako Peninsula, and Waikiki and connecting with a peripheral main line that bypasses the urban core.

4. Service to the University and East Honolulu. The impact of an elevated line along University Avenue is seen as having a “minimal impact on the important views toward the mountains both from the pedestrian’s and motorist’s viewpoint… (and)...The proposed station is not expected to significantly affect the expansive views from the University.” (pg. 5-36) The reader is referred to figures 5.45 and 5.46 which clearly indicate a heavy impact. The EIS comments on this alignment contradict the findings of an earlier city funded study by Spencer Mason Architects.

University transit users could be well served by a transit line that extended beyond University Avenue to a park and ride facility near the Kamehame/Waialae overpass area with a spur leading to a station in the university quarry. This routing would eliminate the significant impacts of the University Avenue route and provide better service to East Honolulu.

5. Ridership access and adequacy of service. The integration of park and ride facilities into the system and coordination with bus service are not adequately addressed. There is also no clear analysis of population density in either residential areas or employment centers. Line terminus points and stations should be located near areas of high employment density or at points where park and ride facilities can be constructed to allow an integration of the transit system with the automobile. The failure of any of the plans to extend the transit line to a point where a park and ride facility could serve East Honolulu traffic is a major concern, as noted above, and
the location of stations along the Salt Lake alternative route seems to offer fewer park and ride site opportunities than the Kamehameha Hwy. alignment.

The AA/EIS also fails to address the adequacy of transit service to the Aloha Tower area, the Kakaako Peninsula and the Discovery Bay/Ilikai portion of Waikiki. Secondary light technology loops could improve service to these areas and permit the shifting of main lines to lower impact alignments, e.g. the main transit line could run along the H-1 alignment through town with the downtown area served by low impact elevated or surface transit systems. A consideration of surface routing on the freeway alignment is not beyond the realm of possibility. The cost savings would be tremendous and the reduced capacity of the roadway for handling vehicular traffic would encourage more commuters to use the transit system.

6. Ridership target groups and Strategies. The system should try to attract riders by its excellence rather than by low fares since commuting by car will likely be more expensive anyway. A high quality transit system will attract riders who will not take the bus would otherwise drive. The San Francisco BART system has demonstrated this potential.

More consideration must, also, be given to the fact that motorists will not readily give up the automobile unless the difficulty and expense of using private vehicles for commuting becomes prohibitive.

7. Funding and Opportunity Costs. No mention is made of the possibility of using the state’s tax surpluses to finance a transit system. No consideration is given to the impact of committing huge sums of public funds to a transit system, and there is no mention of the heavy tax burdens already imposed on Hawaii's citizens or of the impact of additional taxes.

It is important to consider expenditures of the magnitude proposed in the light of benefits that could come from competing projects or from new efforts that could improve the community. The problems of the homeless come to mind, or of improving our educational and university systems. Infrastructure systems need much work, and new imaginative projects that could benefit the community could be envisioned.

How much benefit might Honolulu and Hawaii reap if, for example, an international center for the the promotion of peace and cultural understanding were created on state lands on Kakaako Peninsula in the heart of Honolulu instead of simply carving up
this valuable real estate to benefit yet another group of developers. Would a project of this sort further establish Hawai'i as the land of A'ohina and a leader and exemplar of fruitful avenues to a better world. And, how would these benefits compare to a visitors perception that it took less time to get from Waikiki to the Arizona Memorial, although he or she may have been awakened repeatedly in their hotel room in Waikiki by trains passing nearby in the night.

8. Exploration of Alternatives. The report does not adequately address transit alternatives.

Surface loop systems made more efficient by limiting private vehicular traffic have a good potential for improving circulation and encouraging the use of public transit, but this possibility is not considered.

No mention is made of the benefits that could be gained from bikeways to make cycle transit safe in the urban core despite the popularity of cycle transit in upscale communities such as Palo Alto, California, and the fact that immense numbers of individuals commute by bike in European and third world countries.

The willingness of pedestrians to walk some distance is significantly underrated. Pedestrians walk many blocks in New York city in the Winter because alternatives may be unavailable or unattractive, and the process is neither unpleasant nor uncommon. Yet, the analysis of the distance that individual's will walk in Honolulu's far more pleasant climate is extremely conservative with evaluators suggesting that a shift of a few blocks in transit lines e.g. from Kuhio Ave. to the far side of the Ala Wai Canal, where the trains could be run at grade and integrated with berms and canal improvements, would destroy the viability of the system.

No mention is made of the major deterrent to the use of public transportation that is found in the lack of lateral transit service into the valleys and up the hills of the island. For example, buses run at close intervals between Kaimuki and downtown during the rush hours but service up and down the hills is no better than on the half hour.

All of these elements could be addressed to produce significant improvements in the efficiency and use of alternative and public transit modes. None are addressed in the EIS.
Conclusion:

A well conceived transit system can be a substantial asset for our city, but the potential for damage to our urban environment is high if the system is not well planned. The AA/EIS is a badly flawed document to serve as a guide in evaluating route alignments and the impact of routing. Happily the department of transportation seems to be sensitive to many of the concerns raised by these comments. Their awareness and concern is reflected in the route choices that they have recommended. Joseph Magaldi’s comments at the February 1990 General Membership Meeting of the HC/AIA reflect this sensitivity and underscore the elements that must guide transit decisions: "the footprint of the transit needs to be as delicate as possible. We live in a sensitive environment and a narrow corridor of land. Our major industry demands sensitivity in the design of a project of this scale...As much as the transit system is important, it is also important to do it right."
TELECOPIER TRANSMISSION NOTE

DATE May 25

NUMBER OF PAGES 1 (INCLUDING THIS COVER SHEET)

TO: Bob Sumitomo

FAX NUMBER 527-6987

FROM: Laureen Brennan

FAX NUMBER (808) 548-7265

COMMENTS:

The attached comments and questionnaire on the rapid transit project were faxed to us Wednesday. Please include them with the other comments we sent to you.
OMPO Citizen Advisory Committee

Questionnaire on the Honolulu Rapid Transit Development Project AA/DEIS

Please complete this questionnaire about your organization's position on the Alternatives Analysis/Draft Environmental Impact Statement (AA/DEIS). We are circulating this questionnaire to document the CAC's position on the Rapid Transit Project and the AA/DEIS. After the questionnaires are reviewed and summarized, a copy of the results will be sent to your organization.

Organizations: MYRIAD CONSTRUCTION
Representative: DARRYN BUNDA

1. Has your organization taken an official position on rapid transit? If so, please state your organization's position.
   Although we have no official position, we are supportive of rapid transit.

2. Do you wish to identify what you feel to be your organization's preferences and concerns regarding the rapid transit project? If so, please answer any of the following questions: YES

   a. The AA/DEIS identifies eleven transportation alternatives. Which one does your organization prefer (you may be select more than one)?

      1. No Build
         (Current bus fleet (475); planned and budgeted highway improvements and HOV lanes; one park and ride lot; two bus maintenance facilities)

      2. TSM Alternative
         (Expanded bus fleet (997); no new construction of major capital transit projects; planned and budgeted highway improvements and HOV lanes)
d. Please identify any concerns of your organization regarding the AA/DEIS.

1) The length of time estimated for project completion. It is hoped that the 5-year timetable will be as realistic with the project completed on time and within budget.

2) Planning should include extensions into residential areas, such as Kapolei, Mililani, Hawaii Kai.

3. a. Do you wish to identify your personal preferences and concerns regarding the rapid transit project? If so, please answer the following questions: (use the descriptions above for your selections)

<table>
<thead>
<tr>
<th>No Build</th>
<th>Fixed Guideway</th>
</tr>
</thead>
<tbody>
<tr>
<td>TSM</td>
<td>Alternative 3</td>
</tr>
<tr>
<td></td>
<td>Alternative 4</td>
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<td></td>
<td>Alternative 5</td>
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<td>Alternative 6</td>
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<td>Alternative 7</td>
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<td>Alternative 8</td>
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<td>Alternative 9</td>
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<td>Alternative 10</td>
</tr>
<tr>
<td></td>
<td>Alternative 11</td>
</tr>
</tbody>
</table>

b. Is there any other information about rapid transit that you would like to have? Yes, copies of:
   1) Service & Passenger Forecasting Methodology
   2) Operations & Maintenance Cost Results Report

d. Please identify any of your personal concerns regarding the AA/DEIS.

Attached are my comments to DGP+DTS.
May 23, 1980

Mr. Benjamin B. Lee, Chief Planning Officer
Department of General Planning
City and County of Honolulu
650 S. King Street, 5th Floor
Honolulu, Hawaii 96813

Dear Mr. Lee:

If Oahu is to continue to be an economically vital and attractive place to live, work, and visit, we must be prepared to move people and goods efficiently and effectively. Our overall mobility needs will require an array of available travel options to accommodate the increasing travel demands of both work and non-work trips, not just peak hour demands. We cannot continue to expect our streets and highways to bear our ever-increasing travel demands, without suffering the costly and stressful effects of traffic congestion.

A rapid transit system for Oahu will offer an efficient, additional transportation alternative to accommodate our growing mobility needs—present and future. It will play an important role, together with all forms of ridesharing and paratransit services, towards a comprehensive transportation systems and demand management (TSM and TDM) program. The addition of a rapid transit option will provide the basis from which parking management strategies, transit incentive programs, and other demand management tactics can be implemented.

Our transportation needs have changed drastically over the last 20 years, and so will it change over the next 20 years. Our vehicle population, which increased over 120% in the last 20 years, continues to outstrip population growth. Our workforce population has increased dramatically as a result of more jobs, more working women and more persons of working age (baby boomers).

Increased employment in Ewa will not reduce Oahu's overall traffic and mobility problems. The planned residential and employment growth in the Leeward Oahu region will require transportation systems and services that can accommodate new
and increased travel demands in and within the region. In 20 years, the Ewa and Central Oahu region will hold nearly 30% of Oahu's population. Ewa, alone, will experience a 243% growth - from a 1988 population of 38,682 to an expected population of 127,900 in the year 2010.

The recent formation of the Leeward Oahu Transportation Management Association (LOTHA) is intended to provide unified private sector leadership in working with the city and state to address the transportation demands of a growing Ewa and Central Oahu region, and to actively participate in the development and promotion of efficient transportation systems and services to enhance the region’s mobility, economic vitality, and quality of life. Every traffic reduction strategy developed and promoted by LOTH will be greatly enhanced with the additional travel option afforded by a well-planned rapid transit system.

After reviewing the AADIES, my major concern is the limited amount of information on supporting bus services and transit accessibility for the Ewa and Central Oahu area. Although reference is made to specific reports that append the AADIES, a summary of supporting regional bus statistics within the AADIES would have been helpful for comparative purposes.

Rapid transit ridership potential from the Leeward Oahu region is excellent. There is a demand for transit service that cannot be met with existing express or regular buses. Statistics from the University of Hawaii at Manoa indicate that 20% of its 1988 student population originated from Leeward Oahu. However, until the rapid transit alignment extends beyond the Waialua station, attracting riders from the Ewa and Central Oahu region will depend on superior feeder bus service and convenient auto accessibility from the H-1 and H-2 freeways. In view of this, every consideration must be given to 1) minimize the number of transfers needed to complete a trip, 2) ensure the direct accessibility to the Waialua transit facility from the H-1 and H-2 and Kamehameha Highway, and 3) maximize ridership potential by ensuring that Ewa and Central Oahu will be effectively and efficiently served by feeder buses.

Specifically related to Leeward Oahu, the following are my two major points of concern:

1. *Waialua terminus/maintenance yard - I am concerned that only the 43-acre Navy Drum Storage site off Farrington Highway is cited to serve as the 2013
transit facility for all potential riders north and west of the Waiau interchange. The location of this site will require costly land acquisition and the construction of a new overpass and on/off ramps to improve accessibility to the station. It is also unclear whether 1) Leeward College will have direct access to the transit station and 2) Direct access from H-1 and H-2 will be made possible with the new overpass/on and off ramps. The AADEIS is vague as to the proposed overpass and on/off ramps, not providing adequate assurance that there will be easy auto access from the H-1, H-2 and Kamehameha Highway.

Recommendation: I suggest serious consideration be given to the use of the 22-acre site adjacent to Kam Highway and below the Seaview subdivision as an additional transit facility. Already earmarked for dedication to the City for use as a park and ride or transportation facility, its location offers direct access off the H-1, H-2, and Kamehameha Highway. This convenient location would also permit faster, more efficient feeder bus trips serving the Central Oahu corridor, where the population is expected to reach 156,000 by 2010, an increase of 26,277 from 1988 figures, not to mention eastbound bus service from the N-1.

2. Supporting bus services - Efficient bus service and timely connections to a rapid transit station will be a critical important factor in attracting riders from the Ewa and Central Oahu areas. However, aside from tables indicating average buses per hour and peak/off-peak service headways for various service areas, the AADEIS affords little description or explanation of proposed regular/feeder bus routes and the headways involved. This raises concern about the level of bus service to adequately feed the rapid transit line and to sufficiently provide inter-community bus needs.

I appreciate the opportunity to comment on the AADEIS.

Sincerely,

Darryl T. Bunda
Paratransit Coordinator and President of the Leeward Oahu Transportation Management Association

cc: Mr. Amar Sappal, Project Manager
Fixed Guideway and Integrated Bus System
(All of the following alternatives include: fixed guideway, expanded bus and feeder bus system, planned and budgeted highway improvements and HOV lanes; 9 park and ride sites; bus maintenance facilities)

3. From Pearl City along Kamehameha Highway under Hotel Street to Ala Moana Center, University of Hawaii and Waikiki (17.3 miles)

4. From Pearl City along Salt Lake Blvd under Hotel Street to Ala Moana Center, University of Hawaii and Waikiki (16.7 miles)

5. From Pearl City along Salt Lake Blvd along Beretania Street to Ala Moana Center the University of Hawaii and Waikiki (17.5 miles)

6. From Pearl City along Salt Lake Blvd along Nimitz Highway to Ala Moana Center, the University of Hawaii and Waikiki (17.0 miles)

7. From Pearl City along Kamehameha Highway along Beretania Street to Ala Moana Center, the University of Hawaii and Waikiki (18.0 miles)

8. From Pearl City along Kamehameha Highway along Nimitz Highway to Ala Moana Center, the University of Hawaii and Waikiki (18.0 miles)

9. From Aloha Stadium along Salt Lake Blvd, under Hotel Street to Ala Moana Center to Waikiki (10.3 miles)

10. From Middle Street along Dillingham, under Hotel Street to Ala Moana Center and Waikiki (6.3 miles)

11. From Middle Street along Dillingham and Nimitz Highways to Ala Moana Center and Waikiki (6.7 miles)

b. Is there any other information about rapid transit that your organization would like to have? Not at this time.
b. Noise

Experience with noise impacts in Vancouver reported by several of our members -- a system said to be a model for Honolulu -- leads us to have great concern, particularly because many of the alternative routes proposed would affect densely populated areas. "Mitigation" is always possible but not always very effective, and baffles can be aesthetically unsightly.

c. Growth Impacts

Development around stations and adjacent to the guideway route, particularly if encouraged by the kinds of height and density zoning concessions proposed for the privately financed Convention Center and often mentioned in connection with rail could, we feel, have a seriously negative impact on the neighborhoods affected. Combined with large numbers of buses and automobiles converging on the stations and increased numbers of pedestrians entering and leaving them or shopping or working in the development focused around them, these could be a real problem, particularly since park-and-ride facilities and even bus loading areas at the stations may not be possible in many areas.

d. Aesthetics

The unfavorable impact of the elevated structures proposed needs no comment from us, other than to refer to the drawings on pp. 5-72, 5-78, 5-79, 5-89, etc., of the AA-DEIS. It is worth noting that the Downtown Improvement Association complains in a current issue of the "Downtowner" that elevated routes downtown "are visually and environmentally damaging....have structures which will reduce street capacity and cause traffic congestion." While we agree, we must point out that the same criticisms apply to the remaining sections of the routes.

4. Financial and Institutional Feasibility

There is considerable confusion as to the financing measures now being considered as meeting UMEA's requirements. The AA-DEIS shows two alternative possibilities with respect to an excise tax -- 1% for 6 years or ½ % in perpetuity -- both to finance construction capital costs only (p. 5-40). These differ from what the Legislature adopted last month, and indeed in response to WMPO-CAC questions, the City replied that "a perpetual ½% excise tax surcharge that would be used for both capital and O & M costs was considered in the AA-DEIS, but this option would likely not be pursued by the City." (HRIDP, "Responses to Questions Generated by the WMPO-CAC, April 25, 1990, p. 19).

Be that as it may, and whatever smoke and mirrors are used, we are talking about a capital cost for a rail system of about $5,000 per average Oahu household, and an annual deficit, above fare-box revenues, for debt service and O & M, of about $750 per household, at present cost projections. A ½% excise tax surcharge would raise about $275 per household per year, of which perhaps $75 could be extracted from tourists. The so-called surcharge credit just adopted would return an average of $170 per average household, ranging from $18 for very low-income families to $400 or more for those with incomes approximating $100,000 or more. (We will discuss this further under the section on Equity.)

The AA-DEIS and the City have suggested many other revenue sources to supplement the scant 10% of total costs projected to be derived from fares at present levels. Many of these assume complicated arrangements with private developers or investors which may or may not materialize, especially in view of the losses most new rail
systems are experiencing. Pressures to increase fares to two or three times the present level can be expected, but at best they would still bring in only 20% or 30% of total costs, and such increases would in all likelihood reduce ridership significantly.

The various short-falls indicated in the AA-DEIS are staggering. Were they to be met out of either existing or augmented public revenue sources, especially if debt service on bonds is involved, we fear that this would so strap future city -- and perhaps State -- budgets as to require retrenchment in virtually all other public services and facilities, including schools, health care, housing, infrastructure, etc.

In our opinion the question is not whether we can fund a rail system, but whether we should. In view of the costs and the only marginal benefits shown in the AA-DEIS and indicated above, we think that the answer has to be "No, not at this time -- perhaps in two or three decades, if the population and transit use grow enough to sustain it." It should be remembered that the often-repeated argument that it is better to build now, before prices go up, does not take into account the opportunity costs of the money prematurely spent nor the sacrifice of future technological advances. Already it is generally admitted that to have built HART ten years ago would have been a grave mistake.

5. Cost Effectiveness

On the attached table we show on line 16 the Cost Effectiveness Index for the two groups of rail systems. In addition, we have calculated a CEI -- using, as far as possible, the same method as in the AA-DEIS -- comparing TSM-bus and rail with no-build factor in the value of time savings, we used Tables 6-12, 6-13 and 6-18. We found the following:

\[
\begin{array}{ccc}
\text{Compared with TSM-bus Alternative} & \text{Full-length Rail} & \text{Short (NOS) Rail} \\
\hline
\text{Increase in cost per new rider per ride} & 115.4\% & 47.3\% \\
\text{Increase in average cost per ride over-all} & 46.9\% & 27.7\% \\
\end{array}
\]

These comparisons would, we believe, have been even more striking if, as we indicated previously in these comments, a TSM-bus alternative had been structured more realistically and with a less excessive outlay for new buses. Be that as it may, our attached table also shows the following:

\[
\begin{array}{ccc}
\text{Compared with No-build Alternative} & \text{TSM-bus} & \text{Full-length Rail} & \text{Short (NOS) Rail} \\
\hline
\text{Increase in transit ridership} & 19.2\% & 32.2\% & 28.0\% \\
\text{Increase in capital costs} & 137.9\% & 733.9\% & 708.0\% \\
\text{Increase in annualized O & M costs} & 37.0\% & 27.3\% & 23.9\% \\
\text{Increase in total annualized costs} & 54.8\% & 152.4\% & 109.6\% \\
\text{Ratio of increase in total annualized costs to increase in ridership} & 2.854 & 4.733 & 3.914 \\
\text{Increase in average cost per ride over-all (from line 17)} & 30.7\% & 92.0\% & 48.5\% \\
\end{array}
\]
Compared with No-build Alternative

<table>
<thead>
<tr>
<th>Cost-Effectiveness Index</th>
<th>TSM-Bus</th>
<th>Full-length Rail</th>
<th>Short (NOS) Rail</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>$4.10</td>
<td>$6.11</td>
<td>$4.93</td>
</tr>
</tbody>
</table>

From all the above, we conclude that even as structured, the TSM-bus alternative is more cost-effective than either group of rail alternatives.

6. Equity

If fares remain at present levels, as assumed in the AA-DEIS, both the TSM-bus and the rail alternatives are projected to increase ridership from low-income areas. This is consonant with the findings of the 1980 Census, which showed home-to-work transit ridership ratios from central, lower-income areas at up to five times the ratio to all home-to-work trips found in outlying, more affluent areas.

With a uniform fare structure, this involves considerably higher fares per mile for lower-income transit users. We are not necessarily arguing for zoned fares, as we have not studied the issue, but only point this discrepancy out as a fact of life.

More important, however, in our opinion, is the question of the distribution of costs. As was noted above and on line 4 of the attached table, the AA-DEIS projects 163,000 trips fully or partially by rail in 2005 with the full-length rail alternatives and 128,600 with the NOS alternatives. Ordinarily, a person uses the same travel mode both ways for any given trip; some persons use a mode for more than one round trip; and tourists, at even one round trip by transit per visit, comprise between 10% and 15% of daily transit users. We can estimate that up to 70,000 Oahu residents out of the year 2005 projected population of 975,000, or 7.1% of the total, would be using rail on any given day. Even eliminating children, we are talking about less than 15% of the adult population. With the NOS alternatives, the proportion is even lower.

Yet, to the extent that tax revenues of one kind or another have to be used to finance the system, every one has to pay for it. This is true of Federal funds, too — often forgotten when we speak of"the Feds" picking up 30% of the costs. It is often argued that this is also true of schools, for which all of us are taxed whether we have children attending them or not. This is as it should be, but the vast majority of us have attended public schools at some time or have children who have done or will do so. Moreover, the very survival of society depends on education of its young. This can hardly be said of a rail system heavily subsidized by all but used by only a small minority.

A further inequity must be mentioned. All knowledgeable tax policy students agree that an excise tax is extremely regressive, in that a far larger proportion of the income of poor families — indeed, almost all of it — is subject to this tax, whereas wealthy families only spend a small portion of their income for basic necessities and, as home owners, pay no tax on rent, thus spending a much smaller proportion of the total income in the form of an excise tax.

Furthermore, many kinds of businesses either pay no excise tax at all or are taxed at ½% instead of 4% and, according to the legislation just passed, would not be subject to the ½% surcharge levied on the kinds of consumption goods poorer families have to buy. All of this means that the surcharge will take a considerably bigger bite out of a poor family's budget than of an affluent family's.
The surcharge credit recently enacted only makes this regressive situation worse. Unlike the present tax credit, which is higher for lower income families and phases out above $30,000, the transit credit is levied as a straight percentage of income. It rebates $18 to the $5,000 family, $36 at $10,000, $72 at $20,000, and up to $360 at $100,000 and as high as $450 at $125,000 or more.

An analysis of San Francisco's BART (Bay Area Rapid Transit) system some years ago concluded that "clearly, the poor are paying and the rich are riding". Will history repeat itself in Honolulu?

6. Significant Trade-Offs Between Alternatives

As was stated above, we have made no analysis as between the various rail alternatives, but only as between no-build, TSN-bus, and rail generally. We concluded that No-build solves nothing, so primarily we looked at TSN-bus as an alternative to rail. We did not find that its marginal benefits in ridership, travel time savings, decreases in traffic congestion, and operating costs were anything like an adequate trade-off for the costs, aesthetic disadvantages, and inconveniences ... (during construction and when in operation) associated with rail.

We therefore cannot support any of the rail alternatives and opt for TSN-bus as the basis of the locally preferred alternative. Hopefully, the system actually undertaken could be implemented gradually and with modifications as dictated by experience with it, and would be combined with additional measures, as suggested above, to transform it, in not too many years, into a genuine "bus rapid transit" system which will give the community benefits at least comparable to rail, and at a more reasonable and tolerable cost.

Thank you for the opportunity to comment on this most important planning and financial decision for our community.

Astrid Monson
Astrid Monson, Chair
Planning and Zoning Committee

Patricia Tunmons
Patricia Tunmons, Chair
Transit Task Force

Arlene Kim Ellis
Arlene Kim Ellis, President
**KEY DATA AND PROJECTIONS FOR ANALYSIS OF TRANSIT ALTERNATIVES**

<table>
<thead>
<tr>
<th>Present</th>
<th>#1 (no-build)</th>
<th>#2 (TSM-bus)</th>
<th>#3-8</th>
<th>#9-11 (full rail)</th>
<th>(short rail)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Oahu population (975,000 in 2003)</td>
<td>855,000</td>
<td>192,600</td>
<td>229,600</td>
<td>254,600</td>
<td>246,500</td>
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<tr>
<td>2. Total Oahu daily trips, all modes (3,000,000 in 2005)</td>
<td>2,600,000</td>
<td>230,000</td>
<td>163,000</td>
<td>128,600</td>
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<td>3. Transit trips, week-day average -- 1989 (See below) 1986</td>
<td>187,700</td>
<td>187,700</td>
<td>192,600</td>
<td>229,600</td>
<td>117,900</td>
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<td>4. Rail guideway trips, WDA</td>
<td>--</td>
<td>--</td>
<td>163,000</td>
<td>128,600</td>
<td></td>
</tr>
<tr>
<td>5. Trips by bus only, WDA</td>
<td>187,700</td>
<td>192,600</td>
<td>229,600</td>
<td>91,600</td>
<td></td>
</tr>
<tr>
<td>6. Increase, rail over TSM-bus trips</td>
<td>25,000</td>
<td>16,900</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>7. Transit trips to (and from) downtown, WDA (from no-build)</td>
<td>32,600</td>
<td>40,800</td>
<td>44,300</td>
<td>43,100</td>
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<tr>
<td>8. Daily auto vehicle miles &amp; change/rail trip over TSM-bus</td>
<td>9,196,800</td>
<td>9,067,100</td>
<td>8,957,100</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>9. Average minutes saved per trip</td>
<td>(-1.4%)</td>
<td>(-2.6%)</td>
<td>8.1</td>
<td>5.9</td>
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<tr>
<td>10. Average highway travel time per car trip, minutes</td>
<td>40.45</td>
<td>41.15</td>
<td>39.95</td>
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<tr>
<td>11. Change (%) in pollution compared with no-build</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>C O</td>
<td>-1.3</td>
<td>-2.3</td>
<td></td>
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</tr>
<tr>
<td>H C</td>
<td>-1.1</td>
<td>-2.3</td>
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<td>+2.5</td>
<td>-2.7</td>
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<td>12. Total capital costs (1988 $ million)</td>
<td>151.2</td>
<td>383.0</td>
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<td>13. Annualized capital costs</td>
<td>5.5</td>
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<td>14. Annualized operating and maintenance costs</td>
<td>64.5</td>
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<td>110.8</td>
<td>103.0</td>
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<td>15. Annualized total costs</td>
<td>70.0</td>
<td>98.3</td>
<td>152.2</td>
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<td>16. Cost Effectiveness Index Cost per new rider per ride (See below)</td>
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<td>17. Average cost per r over-all</td>
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**Sources and exp**

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May 22, 1990

Mr. Gordon Lum
C. M. P. O.
1164 Bishop St.
Suite 9164
Honolulu, 96813

Dear Gordon:

At the CAC meeting yesterday we attached to our questionnaire a copy of the comments we are submitting on the AA-DEIS.

Because of confusion on current enrollment levels we used obsolete figures in point 4, page 2 of our statement. May we ask you to correct your copy?

Page 2, point 4, line 7, please change 22 to 25 and 15 to 20. Many thanks and our apologies.

Sincerely,

Audri Nelson
Chair, Planning & Zoning
A comprehensive solution to Honolulu's current and future transportation needs is essential. Public transportation systems including rapid transit must be a part of this solution along with creative transportation management and legislation designed to encourage the use of public transportation.

Improved systems must consider the quality of our inviting climate, our light and air, the views, the pedestrian spaces...the inviting outdoor living, and the scale of the buildings and streetscapes of our urban core, from downtown to Waikiki and beyond, which are all important contributors to our unique lifestyle and not to be sacrificed.

A rapid transit system poses many design challenges that can only be met with a comprehensive approach to urban design, which considers the planning of a system within a city's fabric and the impact of system technology as important elements affecting the built environment.

The following issues are significant in evaluating transit systems and route selection. Many of these points have been neglected or inadequately addressed by the AA/EIS.

1. Route Selection and Technology. Route selection prior to a choice of technology creates a situation in which worst case assumptions must be made in evaluating the impact of route alignments. The visual, psychological and acoustic impact of the technologies varies considerably and should play a major role in determining the preferred route.

2. Acoustic, Visual, and Psychological Impact. All of the technologies considered except the monorail type have a cross-section of approximately twenty three feet wide and five feet high. This is about the size of the H-1 overpass at the School Street exit. An added four feet of height will be required in areas where sound barriers are necessary. Lines would run from 25 to 45 feet, or more, in the air with stacked lines in some areas. Structures of this magnitude are not amenable to aesthetic cover-up approaches. They are problems of pure scale, of heavy presence and impact. The transit system has a significant potential of becoming an intruder in Honolulu's unique, small scale, and vulnerable urban environment.

These problems are poorly addressed by the AA/EIS which suffers from serious inadequacies in evaluating the acoustic, visual, and psychological.
impact of route alignments. Acoustic and visual impacts are consistently understated and psychological impact, probably the most significant concern is largely ignored.

It is difficult to overestimate the importance of these concerns. Massive engineering projects too often become engineering slums with huge semi-permanent facilities exerting a negative impact on large area and large numbers of people. A primary concern in evaluating the impact of a transit system in Honolulu is whether the system trains and guideways can be absorbed by the environment they traverse or will the system blight large areas of our community.

Elevated transit lines have a significant physical and psychological impact on urban environments, and a number of cities have made themselves notorious by ill considered elevated transit corridors. Chicago and San Francisco are noteworthy examples, the latter of which has recently decided to tear down the Embarcadero freeway despite the protests of chinatown merchants and a significantly higher cost than would be incurred if recent earthquake damage were simply repaired.

Simply stated, the effect of loud heavy traffic rushing by 25 to 45 over your head is fundamentally different and far more psychologically threatening than the effect of the same traffic at street level. Elevated transit ways have a generally negative impact on the areas they traverse and even small little used elevated lines have a deadening effect at the street level with their promise of threatening traffic to come. The Seattle center monorail does not add a pleasant atmosphere to the street areas below its route, and Honolulu has been psychologically and visually cut off from its waterfront for years by a traffic ramp at pier 8 that is substantially smaller than either of the proposed Nimitz transit stations.

The usual counter to these concerns is that technology has vastly improved and that at Disneyland a monorail runs right into a restaurant without undue impact on diners.

Honolulu is not an amusement park, and unlike Chicago and San Francisco and Seattle, it is a very small city with a linear form that is extremely narrow. This makes it possible for a single line system to serve much of
the city. It also raises the possibility that much of Honolulu can be
blighted by an elevated linear transit system.

A detailed evaluation of the report's assessment of sound impact also reveals serious
shortcomings. Questions of source location, height, and length, the effects of
multiple sources, and the variation of noise impact from trains vis-a-vis traffic
sound at different times of the day and night are significant in evaluating route
alternatives. The EIS does not address these significant source geometry or diurnal
effects, and the highly debatable area of noise attenuation is glossed over as
"feasible" despite being an extremely difficult and complex engineering problems.
The report does acknowledge that the system may require up to ten miles of four foot
high noise barrier walls, but none of the illustrations that purport to represent visual
impact, include such barriers although they show lines in areas where they will be
needed.

Commentary on the report's adequacy in assessing the psychological impact of routes
is difficult since this significant area is largely ignored. This is a serious failing
since elevated transit lines have a strong potential for blighting much of the urban
core with the strongest impact occurring in Waikiki where the effect on tourism
revenues could be devastating. The key element throughout the urban core is
psychological impact which is a compound of noise and visual factors and the
intrinsically threatening nature of heavy traffic running over one's head. These
factors can combine to affect areas at a substantial distance from the route
alignments. These concerns are doubly important in our narrow linear urban
environment which is highly vulnerable to linear system impacts.

The shortcomings of the report's visual impact analysis is suggested by the EIS
illustrations which are sketchy and of low quality. None of the illustrations convey
any sense of the significance of views of the mountains and of the sea that are
central to our island life. The drawings offer a thin line in the distance as the only
cue that mountains exist, and even this is missing from most of the illustrations.
The crude line drawings show buildings which, were it not for the palm trees, could
be in the middle of Chicago. It would seem reasonable to suggest that a study that
purports to evaluate a project that will cost well over a billion dollars might include
more representative illustrations and the use of photo-montage to accurately
illustrate the effect of transit structures.
MEMORANDUM

Date: May 23, 1990
From: Gordon Lum, Executive Director
To: Department of Transportation Services - Rapid Transit Development Department
Subject: Responses to an OMPO CAC Questionnaire on the Rapid Transit Project AA/DEIS

For a number of months, the OMPO Citizen Advisory Committee made an intensive effort to familiarize its members with the rapid transit development project. The CAC met with representatives of Department of Transportation Services (DTS) and the DTS Rapid Transit Development Department (RTDD) at ten meetings in the last year (four in the last 30 days), on various aspects of the rapid transit project.

A questionnaire was sent to the member organizations on May 19, 1990. Attached are the responses we received. We are forwarding them to you as comments to the Alternatives Analysis/Draft Environmental Impact Statement.
Results of the
OMPO Citizen Advisory Committee
Questionnaire on the
Honolulu Rapid Transit Development Project AA/DEIS

A questionnaire on the Honolulu Rapid Transit Project AA/DEIS was sent to the 36 member organization representatives on Friday, May 19, 1990. The 16\(^\text{th}\) (44% response rate) organizations that replied to this questionnaire are:

<table>
<thead>
<tr>
<th>Organization</th>
<th>Representative</th>
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<tbody>
<tr>
<td>American Institute of Architects - Hawaii Chapter</td>
<td>Nick Huddleston</td>
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<tr>
<td>American Planning Association</td>
<td>Tim Chow</td>
</tr>
<tr>
<td>American Society of Civil Engineers</td>
<td>Susan Uejo</td>
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<tr>
<td>American Statistical Association</td>
<td>Otto Orenstein</td>
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<tr>
<td>Chamber of Commerce of Hawaii</td>
<td>Michael DiCarlo</td>
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<tr>
<td>Charley's Taxi</td>
<td>Dale Evans</td>
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<tr>
<td>Downtown Improvement Association</td>
<td>Van Lee</td>
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<tr>
<td>Downtown Neighborhood Board #13</td>
<td>Andrew Rothstein</td>
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<tr>
<td>Hawaii Bicycling League</td>
<td>Matthew Zoll</td>
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<td>Honolulu Marathon Association</td>
<td>Jeanette Chun</td>
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<tr>
<td>Koolauloa Neighborhood Board #28</td>
<td>Dee Dee Leits</td>
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<td>Kuliouou-Kalani Neighborhood Board #2</td>
<td>Linda W. Starr</td>
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<td>League of Women Voters</td>
<td>Mildred Walston &amp;</td>
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<tr>
<td>Sierra Club</td>
<td>Arlene Lum Ellis</td>
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<tr>
<td>Tax Foundation of Hawaii</td>
<td>Annette Felix</td>
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<tr>
<td>Wahiawa Neighborhood Board</td>
<td>Lowell Kalapa</td>
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<td>Robert Kent</td>
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</table>

The following responses were received:

Question 1. Has your organization taken an official position on rapid transit. If so, please state your organization's position.

No Position Taken by Member Organization (6 - 38%)
American Institute of Architects-Hawaii Chapter
An official copy of our comment will be forwarded to DTS by May 23rd.

American Planning Association
The A.P.A. has no specific position on this proposal.

\(^1\) There were 17 questionnaire responses received. (The League of Women Voters submitted two responses, one from the LWV President, Arlene Kim Ellis; the other from the CAC Representative Mildred Walston.) The response rate and percentages were based on the number of member organizations responding (16). The totals may exceed 100%.
Charley's Taxi
AA/DEIS does not present realistic basis of costs (capital, O&M) on which to choose a Preferred Alternative on any form of "rapid transit". Hence, no position on Preferred Alternative. We do support continued improvement and expansion of public transit.

Hawaii Bicycling League
We have not arrived at a decision. However, HBL strongly supports bicycle commuter access to mass transit and improved bicycle locker facilities at transit (bus or rail) stations.

Kuliouou-Kalani Neighborhood Board #2
Motion to support improved mass transit but not support a fixed guideway system. (Vote was 8-yes and 4-no, but board action must have 9-yes to pass)

Sierra Club
No official position

Support Rapid Transit (7 - 44%)
American Society of Civil Engineers
ASCE supports the fixed guideway/feeder bus system to meet the future demand for travel.

American Statistical Association
Favorable to Mass Transit

Chamber of Commerce of Hawaii
Yes build transit

Downtown Improvement Association
The DIA has for a number of years favored a rapid transit system for Honolulu. It has and continues to support an alignment which goes under Hotel Street as the only viable alignment through Downtown. The DIA does not have an official position for the alignment outside of its area of concern which is downtown Honolulu. The DIA has also not taken an official position on the means of financing a rapid transit system.

Honolulu Marathon Association
Support rail transit
Koolauloa Neighborhood Board #28
Our Board favors the construction of a rapid transit system provided it it funded in a manner acceptable to the Board. (An additional .5% excise tax is not acceptable.) We feel any system if built should be expanded to service Mililani area.

Wahiawa Neighborhood Board
Yes, we support rapid transit as long as rapid transit will support all who live on Oahu. Rail, bus, or fixed guideway.

Do Not Support Rapid Transit (2 - 13%)
Downtown Neighborhood Board #13
The AA/DEIS is insufficient to warrant favoring the city's rapid transit proposal. Many alternatives, particularly non-capital-intensive ones, were ignored.

League of Women Voters
We oppose all the rail alternatives at this time and opt for TSM-bus. (Ellis)

Other Comments (1 - 6%)
Tax Foundation of Hawaii
The Tax Foundation supports the exploration of transportation alternatives which will alleviate the congestion of automobiles on our Island's roadways including the concept of a mass transit system; however, expansion of our City's current bus system or construction of a fixed rail rapid transit system should be paid with the existing sources and levels of tax revenues and with user responsive fees and charges. The Tax Foundation does believe an increase in taxes is warranted.

Question 2. Do you wish to identify what you feel to be your organization's preference and concerns regarding the rapid transit project? If so, please answer the following questions:

a. The AA/DEIS identifies eleven transportation alternatives. Which one does your organization prefer (you may select more than one)?

No Selection Made (4 - 25%)
American Planning Association
American Society of Civil Engineers
Hawaii Bicycling League
Koolauloa Neighborhood Board #26
Sierra Club
TSM Alternative (5 - 31%)
American Institute of Architects
TSM plus. All possible alternatives need to be considered.

Kuliouou-Kalani Neighborhood Board #2
Use of jitneys and other para-transits; controlled lights;
designated/dedicated mass transit vehicle lanes.

League of Women Voters
Tax Foundation of Hawaii
Wahiawa Neighborhood Board #26

Fixed Guideway From Pearl City Along Kamehameha Under Hotel St. (5 - 31%)
American Institute of Architects
Strong organization preference (University of Hawaii via the
quarry and Waikiki subsidiary loop if not light technology)

American Statistical Association
Chamber of Commerce of Hawaii
Downtown Improvement Association
Honolulu Marathon Association

Fixed Guideway From Pearl City Along Salt Lake Blvd Under Hotel St. (2 - 13%)
Downtown Improvement Association
Tax Foundation of Hawaii

Fixed Guideway From Aloha Stadium Along Salt Lake Under Hotel St. (1 - 6%)
Downtown Improvement Association

Fixed Guideway From Middle Street Along Dillingham Under Hotel St. (1 - 6%)
Downtown Improvement Association

None of the Above (2 - 13%)
Charley's Taxi
Downtown Neighborhood Board #13

Need to Consider More Alternatives (1 - 6%)
American Institute of Architects

" DIA favors the Hotel Street alignment. It does not have a position regarding the rest of
the alignment."
2(b). Is there any other information about rapid transit that your organization would like to have?

No Response Given (7 - 44%)
- American Planning Association
- American Society of Civil Engineers
- American Statistical Association
- Honolulu Marathon Association
- Koolauloa Neighborhood Board #26
- League of Women Voters
- Sierra Club

Comments (9 - 56%)
- American Institute of Architects
  Alternatives and complimentary systems?
- Chamber of Commerce of Hawaii
  1. Ridership Projections
  2. O & M cost
  3. Feeder bus system
- Charley's Taxi
  Written Comments being submitted on AA/DEIS, citing other methods un-tried. Try them before doing the rail.
- Downtown Improvement Association
  More information concerning the proposed financing of the proposed alternatives.
- Downtown Neighborhood Board #13
  Detailed presentation of assumptions underlying ridership projections.
  An evaluation of such alternatives as different zoning and paratransit.
- Hawaii Bicycling League
  1) Bicycle rack or locker facilities at stations. Racks must be designed to accommodate both mopeds and bicycles, allowing users access "with dignity".
  2) Can the City and FBQD get information concerning bicycle commuters using the rapid transit or bus systems? Specifically, the San Jose system should be studied.
Kuliouou-Kalani Neighborhood Board #2
Are there plans to modify existing freeway ramps so that one
ramp will no longer serve as both an on-an-off ramp? (example:
Panahou and also Vineyard).

Tax Foundation of Hawaii
The Tax Foundation would appreciate a more detailed financial
plan for the anticipated operating and maintenance costs of the
rapid transit system. To date, what little has been shared does
not appear reasonable or have in-depth analysis. Before capital
construction is undertaken, such a financial plan is imperative.

Wahiawa Neighborhood Board #26
No.

2(c). Please identify any concerns of your organization regarding the AA/DEIS.

No Response Given (8 - 50%)
American Planning Association
American Society of Civil Engineers
American Statistical Association
Chamber of Commerce of Hawaii
Hawaii Bicycling League
Honolulu Marathon Association
Koolauola Neighborhood Board #26
Sierra Club

Comments (8 - 50%)
American Institute of Architects
Poor analysis of visual, acoustic, psychological and economic
impacts. Per official comments to be issued.

Charley's Taxi
Effects of transfers and bus route changes not sufficiently
explained.

Downtown Improvement Association
Not known at this time, further review is needed.

Downtown Neighborhood Board #13
Inadequate on which to base billion $ decisions. Doesn’t
adequately explain what it did and didn’t adequately cover the
potential alternatives.
Kuliouou-Kalani Neighborhood Board #2
Concerned on paying billions for construction for system that will only remove 1-8% of cars off the road. Concerned on identified sources of revenue for O & M.

League of Women Voters
See attached comments being submitted to DTS.

Tax Foundation of Hawaii
Aside from the excise tax (transit tax), there appears to be very little consideration given to other sources of funding for capital construction. Further, there appears to be little thought given to alternatives that would encourage ridership of the system. All of the analysis appears to be straightline statistical forecasts with little discussion of how ridership might be increased while raising additional source of funding for the system such as economic incentives or disincentives such as parking assessments, gasoline taxes, weight taxes on existing vehicles.

Wahiawa Neighborhood Board #26
No new tax to build rapid transit.

3(a). Do you wish to identify your personal preferences and concerns regarding the rapid transit project? If so, please answer the following questions: (you may select more than one)²

No Response Given (4 - 24%)
- Chow (American Planning Association)
- Uejo (American Society of Civil Engineers)
- Letts (Koolauola Neighborhood Board #26)
- Kalapa (Tax Foundation of Hawaii)

No Build (2 - 12%)
- DiCarlo (Chamber of Commerce of Hawaii)
- Felix (Sierra Club)

TSM (5 - 29%)
- Chun (Honolulu Marathon Association)
- Starr (Kuliouou-Kalani Neighborhood Board #2)
- Ellis (League of Women Voters)
- Walston (League of Women Voters)
- Kent (Wahiawa Neighborhood Board #26)

² The percentage rates for the responses to following questions were based on 17 responses.
Fixed Guideway

Alternative 3 (3 - 18%)

Lee (Downtown Improvement Association)
I favor the alignment but have reservations about the financing.

Zoll (Hawaii Bicycling League)

Walston (League of Women Voters)
If we are stuck with it, and we will be!

None of the Above (2 - 13%)

Evans (Charley's Taxi)
Rothstein (Downtown Neighborhood Board #13)

Other (1 - 6.25%)

Huddleston (American Institute of Architects)
See attached notes.

3(b). Is there an other information about rapid transit that you would like to have?

No Response Given (9 - 53%)

Chow (American Planning Association)
Uejo (American Society of Civil Engineers)
Grenstein (American Statistical Association)
Chun (Honolulu Marathon Association)
Letts (Koolauloa Neighborhood Board #26)
Starr (Kuliouou-Kalani Neighborhood Board #2)
Ellis (League of Women Voters)
Felix (Sierra Club)
Kalapa (tax Foundation of Hawaii)

Comments (8 - 47%)

Huddleston (American Institute of Architects)
See attached notes

DiCarlo (Chamber of Commerce of Hawaii)
Ridership Projections, O&M Costs, Feeder Bus System

Evans (Charley's Taxi) Same as 2(b)

Lee (Downtown Improvement Association)
More detailed information concerning the financing, projected costs, and type of technology to be utilized.
Rothstein (Downtown Neighborhood Board #13)
Same as 2(b)

Zoll (Hawaii Bicycling League)
More information provided to HBL

Walston (League of Women Voters)
I will say we have been inundated with info—all of which I have felt from Day One is just "lip service". The intention has always been to build, which is what they will do regardless of what the public (the taxpayers who will ultimately pay for it) wants, and regardless of the fact that none of the lines already built have lived up to expectations. Honolulu simply does not have the population -- it will never be anything but a white elephant -- and it will not serve the Windward, Hawaii Kai or Ewa areas, unless untold billions more are spent, and our population is just not sufficient to afford it!!!.

Kent (Wahiawa Neighborhood Board #26)
No.

3(c). Please identify any of your personal concerns regarding the AA/DEIS.

No Response Given (10 - 59%)
Chow (American Planning Association)
Uejo (American Society of Civil Engineers)
Orenstein (American Statistical Association)
DiCarlo (Chamber of Commerce of Hawaii)
Evans (Charley's Taxi)
Zoll (Hawaii Bicycling League)
Chun (Honolulu Marathon Association)
Ellis (League of Women Voters)
Leits (Koolauoa Neighborhood Board #26)
Kalapa (Tax Foundation of Hawaii)

Comments (7 - 41%)
Huddleston (American Institute of Architects)
See Notes

Lee (Downtown Improvement Association)
Have not had sufficient time to review the AA/DEIS to be able to comment at this time.

Rothstein (Downtown Neighborhood Board #13)
See #2 above
Starr (Kuliouou-Kalani Neighborhood Board #2)
Concerned on reasonableness of ridership projections. Concerned on lack concern to preserve the natural view planes. And especially the 44 x 240 feet stations along Kuhio Avenue.

Walston (League of Women Voters)
Most of it is not understandable to John Q. Public. Even the statistical analysts who ask questions do not receive answers that satisfy them.

Felix (Sierra Club)
That's a lot of concrete. Think we should spend more time trying alternatives

Kent (Wahiawa Neighborhood Board #26)
Stop the daytime construction on major streets in Honolulu. Stop all truck deliveries on major streets in Honolulu daytime, make night deliveries or side street day time. No on street parking major streets, right lane marked for bus traffic only. Free, shuttle bus traffic downtown Honolulu, express bus all day long to downtown. 10 to 15 new park & ride locations with some child care centers at key park & ride locations
THE LEAGUE
OF WOMEN VOTERS OF HONOLULU

May 22, 1990

Mr. Benjamin B. Lee, Chief Planning Officer
Department of General Planning
City and County of Honolulu
650 South King Street, 8th Floor
Honolulu, Hawaii 96813

Mr. Amar Sappal, Project Manager
Department of Transportation Services, RTDD
City and County of Honolulu
650 South King Street, Third Floor
Honolulu, Hawaii 96813

Gentlemen:

Thank you for the opportunity to comment on the AA-DEIS for the Honolulu RTD project. We submitted testimony at the May 8 public hearing, but limited it to criticisms of the AA-DEIS itself and what we considered shortcomings in the way the alternatives were formulated and presented, rather than to an evaluation of the alternatives themselves. We are now summarizing that statement and adding our comments on the three main options -- no-build, TSM-bus, or rail, and also the alternative preferred by the League after six months of study, several membership meetings and returns to a questionnaire distributed to our entire membership.

At a meeting May 18, we concluded, with about 80% concurrence, that we cannot support any of the rail alternatives; that the no-build option is unacceptable in view of the island's growing traffic and transit problems; and that we must therefore choose the TSM-bus alternative as the only viable basis for future action. This is in spite of the fact that we think that as structured in the AA-DEIS, it over-emphasizes simply adding more buses but does not include, so far as we could determine from the scanty description given in the AA-DEIS, consideration of such additional measures as would develop a true "bus rapid transit" system giving priority and precedence to transit vehicles over private automobiles, such as bus-on-lanes in congested locations, selected grade separations at key intersections on bus routes, possibly a short bus subway downtown, and various para-transit programs to encourage private as well as public provision of mini-buses, vans, computerized ride-sharing, etc.

Such a system, we believe, could attract enough additional riders to narrow or close the gap -- 25,000 daily rides as now projected between TSM-bus and the average of the six full-length rail alternatives, or 17,000 compared with the average of the three MOS options -- at a capital cost not necessarily higher than that project for the TSM-bus as now structured, but certainly far lower than for a rail system.

Though we must question some of the projections in the AA-DEIS for such items as ridership, we are in no position to dispute their premises or methodology or develop what we might consider more realistic ones. We therefore are basing our comments on the data and projections of the AA-DEIS.
General Comments

1. The lay public, in something like 55 days, cannot adequately analyze the complex results of years of work by professional planners and engineers at the cost of millions of tax dollars. Like many documents of its kind, the AA-DEIS essentially presents data and arguments in support of what its contracting agency is proposing, and gives only cursory treatment to the alternatives not favored. We do, however, find it to be more objective and credible than its ten-year-old predecessor, the AA-EIS prepared for the Honolulu Area Rapid Transit (HART) proposal.

2. To whatever extent the current AA-DEIS may -- consciously or unconsciously -- appear to favor the rail alternatives, a careful study of the data and projections presented does not, in our opinion, by any means lead to the conclusion that rail would be the preferred course of action for Honolulu at this time.

3. Many of the important criteria and factors needed to evaluate the alternatives are not easily found in the report, except by ploughing through many pages of text, tables, and graphics. An index would have been helpful. The Executive Summary does not include such comparative data for the alternatives as the projected number of rail guideway users, or the total annualized cost -- for capital as well as maintenance and operations -- of each option. (We note that the rail ridership projections have now been added in the current Transit News Letter #4 dated April, 1990.)

4. We also must question the structure of the alternatives presented, though we are told that these had to follow Federal guidelines rather than reality. The no-build projections show an increase by 2005 of only 2.6% from the current level of bus ridership shown in the AA-DEIS. Actually they show a decrease from the usual current ridership counts, after allowance for transfers, which are found in various official publications. The AA-DEIS shows a decrease in relative daily bus ridership from the current level of 25 per 100 population to 19 in 2005 -- said to be due to poorer bus service caused by greater traffic congestion. This is said to be in spite of inclusion in the no-build alternative of a $150 million worth of highway improvements, the re-assignment of bus routes better to meet the demand, additional park-and-ride and maintenance facilities, etc. How will it benefit people to use their cars rather than the bus if they have to cope with this same congestion?

5. The TSM-bus alternative, on the other hand, is made to show so great an increase in the number of buses required, and hence in operating and maintenance costs as well as capital costs, as to put it in an unfavorable light in comparison with rail. It shows an increase of 110% in the number of buses, and of 153.3% in capital costs, over no-build, to produce a 19.2% increase in riders. In fact, riders only increase 22.3% over their present volume. These projections are in spite of the expenditure of $383 million for new buses, maximum TSM improvements, park-and-ride facilities, etc. Does the TSM alternative, as structured, make any sense except as a straw man to be knocked down by rail?

6. In spite of this, daily total 2005 transit ridership, with rail, is projected from data in the AA-DEIS to be only 25,000 more than with TSM-bus. Even assuming for now that the entire reduction is in peak periods, we are talking about only 10,000 fewer cars on the road in each peak period -- about 4% of 1980 Census totals for cars used between home and work all day, and an even smaller percent in 2005.

7. Total automobile vehicle miles traveled in 2005 show similar small reductions with a rail system in place from what they would be with TSM-bus, even when the differences are adjusted to allow for the greater impact of buses on the roads. How can the environmental, health, energy and other benefits of rail be meaningful with such insignificant reductions in automobile usage?
Evaluation of No-Build, TSM-Bus, Rail

As suggested in the April 1990 HRT News Letter #4, we will group our discussion of alternatives under the six "Evaluation Measures" listed therein. Our studies did not include an evaluation as between rail alternatives, but only as between no-build, TSM-bus, and rail generally, though for some purposes we split rail into the full-length and the MOS options, each as a group.

1. Costs

We believe that the costs of a rail system need to be looked at not only in absolute terms but also in relation to who and how many will benefit from it and who and how many will pay how much for it. We have concluded that the projected high capital costs of rail, even when combined with its slightly lower operating costs, cannot be justified by the limited increase in total transit ridership shown in the AA-DEIS as compared with the TSM-bus alternative. We attach a data sheet used in studies, which shows the following in relation to costs:

<table>
<thead>
<tr>
<th>Compared with TSM-Bus Alternative</th>
</tr>
</thead>
<tbody>
<tr>
<td>Full-length Rail</td>
</tr>
<tr>
<td>Increase in annualized capital costs (from line 13)</td>
</tr>
<tr>
<td>Decrease in annualized O &amp; M costs (from line 16)</td>
</tr>
<tr>
<td>Increase in annualized total costs (from line 15)</td>
</tr>
<tr>
<td>Increase, average cost per ride, over-all (from line 17)</td>
</tr>
</tbody>
</table>

A full-length rail system would have to attract 374,500 daily riders -- 120,000 or 47.1% more than projected -- to bring its average cost per ride down to what ... line 17 shows for TSM-bus. The relationship between costs and other evaluation measures will be discussed below.

2. Transportation Impacts

The high costs of a rail system could still be justified, we believe, if the resulting reduction in automobile traffic were enough materially to affect highway traffic congestion or if greatly increased transit ridership resulted. But the AA-DEIS does not show either of these to be the case. Again, from the attached study table, the following can be seen: (Headings as above)

| Increase in total transit trips (from line 3) | 10.9% | 7.4% |
| Transit trips as a percent of total daily trips (from line 3 and line 2) | 8.49% | 8.22% |
| Increase in this ratio in percentage points over TSM-bus's 7.65% | 0.84 | 0.57 |
| Rail guideway trips as percent of total trips (from line 4 and line 2) (Not comparable with TSM-bus) | 5.43% | 4.29% |
| Increase in transit trips to & from downtown (from line 7) | 8.6% | 5.6% |
| Decrease in total auto vehicle miles (from line 8) | 1.2% | NA |

(continued on next page)
Compared with TSM-Bus 'Alternative

<table>
<thead>
<tr>
<th></th>
<th>Full-length rail</th>
<th>Short (MOD) Rail</th>
</tr>
</thead>
<tbody>
<tr>
<td>Decrease in total vehicle miles, adjusting for buses a/</td>
<td>3.1%</td>
<td>NA</td>
</tr>
<tr>
<td>Decrease in transit ... time per trip b/</td>
<td>8.1 min.</td>
<td>5.9 min.</td>
</tr>
<tr>
<td>Decrease in highway travel time per trip c/</td>
<td>1:2 min.</td>
<td>1.2 min.</td>
</tr>
<tr>
<td>Weighted average decrease, all trips (from lines 2 and 3)</td>
<td>1:0 min.</td>
<td>1.6 min.</td>
</tr>
</tbody>
</table>

We note that the transit time decreases projected in the AA-DEIS for rail are predicated on two-minute train headways, which in turn are based on the high rail ridership projected. As this is several-fold the ridership ratio in other cities such as Vancouver and might be significantly reduced if higher fares were instituted to increase the proportion of costs covered by the fare-box, longer intervals between trains might be necessary and would reduce the projected time savings.

3. Environmental Impacts

We have not been able, in the time available, to review the details of most of the environmental factors discussed in the AA-DEIS, but we have a few comments to make on selected points:

a. Air Pollution

From the attached table, line 11, only minimal air pollution impacts are shown as cited in the AA-DEIS; p. 5-40, between TSM-bus and rail. This could hardly have been otherwise in view of the small decreases shown on line 8 for vehicle mileage. Even with the considerable decrease in bus mileage projected for the rail alternatives, as shown on p. 5-28 of the AA-DEIS, the over-all decrease in pollution is insignificant. The use of electric buses, which we have long advocated, could cut road pollution, though if dependent upon fossil fuel for power generation, may not reduce island-wide pollution.

Our analysis revealed the following from the attached table, line 11 (Headings as above):

<table>
<thead>
<tr>
<th></th>
<th>1.0 percentage points</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Decrease in C.O.</td>
<td>1.2</td>
<td>&quot;</td>
</tr>
<tr>
<td>Decrease in HC</td>
<td>&quot;</td>
<td>&quot;</td>
</tr>
<tr>
<td>Decrease in NO</td>
<td>2.2</td>
<td>&quot;</td>
</tr>
<tr>
<td>Decrease in PM</td>
<td>3.2</td>
<td>&quot;</td>
</tr>
<tr>
<td>Decrease in SO</td>
<td>5.2</td>
<td>&quot;</td>
</tr>
</tbody>
</table>

a/ Adjusting for decrease in bus miles by equating impact of one bus on the road to the impact of six automobiles

b/ AA-DEIS, p. 6-24, average of respective alternative groups

c/ HALI 2000, Table 6-5. 41.15 min. for TSM-bus, 39.95 min. for rail by averaging light and heavy rail
5.0 COMMUNITY, CIVIC AND BUSINESS ASSOCIATIONS
9 July 1990

Council Chairman  Arnold Morgado, Jr.
Council Members  Neil Abercrombie, John DeSoto, John Henry Felix,
                 Gary Gill, David W. Kahanu, Donna Mercado Kim,
                 Leigh-Wai Doo and Rene Mansho

Honolulu Hale
Honolulu, Hawaii

Dear Council Chairman and Council Members,

Enclosed are The American Institute of Architects, Honolulu Chapter's
comments and recommendations on the Rapid Transit Development Project
as proposed in the AA/DEIS. These documents act as our official policy
statement.

The AIA fully supports the necessity of a rapid transit system, and of the
eleven alternatives presented in the AA/DEIS we recommend Alternative #3
but with the enclosed changes.

The AIA appreciates the opportunity to comment and hopes the
recommendations will be given considerable thought.

Sincerely,
Honolulu Chapter/The American Institute of Architects

Theodore E. Garduque, AIA
President

TEG:mmp

Enclosure

cc: Honorable Mayor Frank Fasi; Ben Lee, Dept. of General Planning;
    Joseph M. Magaldi, Jr, Deputy Director Dept. of Transportation Services
COMMENTS/RECOMMENDATIONS

from the
HONOLULU CHAPTER AMERICAN INSTITUTE OF ARCHITECTS,
dated 9 July 1990

on the
RAPID TRANSIT DEVELOPMENT PROJECT

as proposed in the:
ALTERNATIVES ANALYSIS and DRAFT
ENVIRONMENTAL IMPACT STATEMENT (AA/ DEIS)
dated March 1990

and prepared by:
DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU
AIA COMMENTS ON THE RAPID TRANSIT DEVELOPMENT PROJECT

The Honolulu Chapter American Institute of Architects fully supports a rapid transit system as part of the solution to Honolulu's current and future transportation needs. We believe continued reliance on roads, the automobile and a bus system, expanded or not, will not suffice. Further, the complete solution to transportation needs also includes creative transportation management as in paratransit systems, and creative legislation which discourages automobile use and encourages public transportation.

The AIA supports Alternative #3 but with a few recommended amendments. This route runs from Waialua down Kamehameha Highway past the Honolulu International airport through downtown under Hotel Street and eventually branching to Waikiki and the University of Hawaii. Choosing a shorter route as in Alternative #10 would be a solution that might subject the city to its shortcomings for a long time. This alternative starts at one of the worst traffic congested areas, at Middle Street possibly inhibiting park-and-ride and bus transfers. These potential transfers become less possible at the east end because the route terminates at Waikiki. The Waikiki segment in Alternative #10 is seen as having more adverse impact because it is a two-way system instead of a one-way with turn-outs at the stations. Because it is anticipated that federal funding will terminate in a few years and construction cost will only be that much higher, it would seem wise to maximize Federal participation by biting the bullet now and building a system which can properly serve the area for a long time. This is also why we think Alternative #3 should be revised slightly to maximize car/bus feeders at the Diamond Head end and on the Ewa side.

The quality of our inviting climate, our light and air, the views, the pedestrian spaces . . . the inviting outdoor living and the scale of the buildings and streetscapes of Honolulu are important attributes which should not to be sacrificed.

Our comments and recommendations on the proposed system as described in the AA/DEIS can be divided into primary and secondary categories.
PRIMARY CONCERNS

A. The AA/DEIS does not specifically address the environmental impact of the various technologies because of the decision to let the selection be based upon the winning proposal from the private sector. The visual, and perhaps psychological barrier and acoustical impact of the technologies varies considerably, and this should play a major role in determining the preferred route. All technologies considered, except the monorail type, have a cross-section of approximately 23 feet wide and 5 feet high with an added four feet of height in areas where sound barriers are required. Lines would run from 25 to 45 feet, or more, in the air with stacked lines in some area. Structures of this magnitude are not amenable to aesthetic cover-up approaches. The problem of scale is not compatible with Honolulu's unique, small scale, and urban environment.

1. Underground Hotel Street is an acceptable downtown route. The Beretania/Alakea route is not acceptable, because of congestion and service to buildings. The Nimitz route could be considered, but only if contingent upon selection of a monorail type technology due to its least visual impact; and if the Aloha Tower station was redesigned or relocated in such a way as not to be a heavy dominate feature to the low scale Aloha Tower redevelopment. Since the technology will not be chosen until after the route selection, we suggest that when reviewing the alternative routes one must consider if they can accept the technology with the greatest environmental impact (dual guideway/steel wheel/steel rail) on that particular route.

There is contradiction and unequal favoring of the Nimitz alignment over the underground Hotel Street route. Section 6.2.6 stresses the advantages of the Nimitz route on the assumption that a "level of construction uncertainty, and implementation problems" exist without any analysis of the problem. In addition, it is stated as an environmental advantage that the Nimitz route has less visual impact. But in making a comparison in paragraph no. 3 it states a Transportation Systems Management advantage over the fixed guideway alternatives is that it "avoids the adverse impacts ... such as the visual impact of the aerial structures." How is it that obstruction of rider views from underground Hotel Street is considered as having a visual impact more adverse than the impact of aerial structures?
2. With the branch line into Waikiki, the plan could use some flexibility. The worst case technology for the main line (steel wheel/steel rail) could be unacceptable in the Kuhio Avenue corridor. We recommend serious consideration be given to a lower technology like the Darling Harbour system in Sydney, Australia.

3. The branch line to the University of Hawaii might make more environmental and economic sense if it branched from a main line which terminates mauka of H-I at the Kapiolani/Waialae area and then access the University through the quarry end of the campus. This would accomplish the similar results but have little environmental impact on University Avenue and also sets the stage for a park-and-ride and bus transfer at H-I.

B. The integration of park-and-ride facilities into the fixed guideway system has not been addressed and is a missed opportunity. As currently planned this end of the main line terminates just Diamond Head of University Avenue on Kapiolani Boulevard, but if continued eastward along Kapiolani to the juncture of Kapiolani and the H-I freeway and linked up with a major park-and-ride facility easily accessible from the H-I freeway, it would attract greater ridership.

C. The report's assessment of sound impact requires more attention. There are technical questions of source, location, height, and length, the effects of multiple sources, and the variation of noise impact from trains vis-a-vis traffic sound at different times of the day and night. The AA/DEIS does not address these significant source geometry or diurnal effects, and the highly debatable area of noise attenuation is glossed over as "feasible" despite being a very difficult and complex engineering problem. The report does acknowledge that the system may require up to ten miles of four foot high noise barrier walls, but none of the illustrations that purport to represent visual impact include such barriers although they represent lines in areas where they will be needed.
SECONDARY CONCERNS

A. Generally try to attract riders by its excellence, not low fares since commuting by car likely will be more expensive anyway.

B. Recognize that a high quality rapid transit system will attract riders who will not take the bus and otherwise would drive (the San Francisco BART system is a good model).

C. Favor the center-platform type station over the side-platform type because of the much greater mass and shadows of the latter type.

D. Funding/Urban Planning
   There is nothing inherently wrong with the concept of trading zoning for partial private funding of a transit system as long as from a urban design perspective, the city comprehends which areas should or should not transform into nodes/centers and that the developer is not given a blank check.

The Honolulu Chapter American Institute of Architects would like to see this project come to reality. To quote Mr. Joseph Magaldi from our February 1990 General Membership Meeting the "footprint of transit needs to be as delicate as possible. We live in a sensitive environment and a narrow corridor of land. Our major industry demands sensitivity in the design of a project of this scale... As much as the transit system is important, it is also important to do it right."
May 9, 1990

Mr. Joseph Magaldi, Deputy Director
Department of Transportation Services
City and County of Honolulu
Honolulu, Hawaii

Mr. Magaldi:

Subject: Mass Transit System on Oahu

For those of us involved with community and business organizations interested in a long-term solution to the most critical transportation problem on Oahu, we first express our appreciation to our State Legislature and the executive branches of both the State and City and County in providing a funding formula as an initial step. We recognize its tenuousness in terms of the concern many taxpayers have two years down the road should the anticipated funding share from the private sector falter.

The Building Industry Association feels there is time to develop viable options that might ensure getting the private sector to carry its weight without resorting to an increase in the general excise tax to help fund both the construction and maintenance of the proposed system.

An obvious consideration would be to determine the extent the government, the City in this instance, is willing to go on land and development rights and still adequately satisfy environmental and esthetic concerns. This aspect undoubtedly will engender considerable debate, which it should.

The association's support for mass transit is not based on the work it would provide industry workers and qualified companies, but rather, on its concern with present and future traffic gridlock. We are aware the system as presently designed would require feeder links to many residential communities. There are also the questions of sufficient ridership and high maintenance costs. These are concerns that have to be dealt with as satisfactorily as possible. Critics of the system all point to existing mainland counterparts that supposedly have the problems cited.

This community can overturn these seemingly crushing obstacles through a step-at-a-time continuous educational program, perhaps using the neighborhood board network, with emphasis on the fact that we have no other meaningful alternative. Among considerations that the body politic could pursue might be policies requiring removal of an existing automobile for every new one shipped in: a moratorium on public garage construction; limit households to a maximum two automobiles; ban government employees
from parking personal vehicles in government garages during their work hours; offer incentives to the public for using mass transit, such as reduced rates for weekly or monthly passes, available snacks/refreshments on board, etc.

We're sure there are many other meritorious ideas that can be considered to help bolster ridership, including a weekly/monthly raffle offering free one-week transit passes if not considered a lottery.

Honolulu is on the brink of moving into the 21st century with an opportunity to change its attitude on public transportation. It must, considering the uncertainty of the continued high availability of fossil fuels and the possible immobility of our population on present roadways and highways if we abandon a rail system.

Thank you for the opportunity to express our general views on the need for a mass transit system for Oahu.

Respectfully,

BUILDING INDUSTRY ASSOCIATION OF HAWAII

Elroy Chun
Executive Vice President
May 8, 1990

To: Department of Transportation Services

From: Robert B. Robinson, President

Subject: Honolulu Rapid Transit Development Project's Alternatives Analysis/Draft Environmental Impact Statement

My name is Robert B. Robinson. I am president of the Chamber of Commerce of Hawaii, which is an organization of over 4,000 large and small businesspersons.

Honolulu is poised to join the great cities of the world that provide rail transit for the movement of their citizens. We have not reached this point without controversy. A project of this magnitude, by its very nature, generates a variety of opinions. I have been a citizen of Hawaii for more than 40 years and remember very well the controversy surrounding the building of the H-1, then called the "Mauka Arterial." Now we cannot imagine how we ever got along without it.

Some gloom-and-doom peddlers in Portland, Oregon, predicted fiscal disaster for MAX, their new 15-mile light-rail system. They expected a $9.00 cost per trip—instead, construction and operations cost per trip is $3.60. They predicted half the ridership projected by authorities—instead, actual ridership exceeded projections. Christmas retail sales went up by over 50%. Businesses are dealing with customers they have never seen before. In short, MAX is a smashing success. Vancouver, where spectacular passenger growth is spawning new extensions, is another success story.

We at the Chamber believe rapid transit will bring benefits like these to our community. To accomplish this, it is essential to make the route selection wisely, after thorough study of alternative routes.

Among the many considerations which must be addressed are impact on the environment in the affected neighborhoods, comparative accessibility for prospective riders and the efficiency each alignment offers. Service to the airport and Waikiki, two areas most important to our state's economy, should be considered.

The important thing for us to remember at this vital stage in the story of Honolulu rapid transit is that we are planning not just for ourselves, but for future generations. In making our choice, we must aim for excellence.

Thank you for this opportunity to testify.

The Chamber of Commerce of Hawaii
My name is Cliff Slater and I am here to testify on behalf of COST!, the Committee On Sensible Transit, a new organization formed to educate taxpayers about the proposed new rail system and the less costly alternatives available to us.

The City tells us that its preferred alternative is the Kam/Hotel alignment. If the City meets its cost and ridership projections they say that the cost per new rider will be $9.19.

The City tells us that this is the most cost effective way possible to reduce vehicular traffic. This is absolute nonsense. In fact, it would be difficult to find a more expensive way of moving people.

The typical new commuter will make six round trips per week. That will mean a cost of two times $9.19 or $18.38 a round trip. Six round trips will amount to $110 per week, or $473 per month. Deducting the $15 bus pass will mean a taxpayer subsidy of $458 per average rider per month or $5,500 per year.

COST! has tried to find more expensive ways for people to commute but failed. For example, if six people commute daily by sharing a chauffeured limousine, the cost would still be 25% less than that of the proposed rail transit.

On the other hand, the local private transportation industry can provide daily door-to-door guaranteed seat commuter service for less than $100 per month per person. Even if this service was provided free to commuters, it would still be only 20% what rail will cost the taxpayer even if the City makes its projections. And it would get rid of traffic congestion in a hurry.

The problem is that there has been no dialog between local transportation professionals and the City bureaucracy. There has been no attempt whatsoever by the City Administration to involve the private sector in solving our traffic problem.

Instead of building rail transit, the City should consider using a small part of this proposed rail subsidy to fund private sector options. With such an incentive private enterprise would find a host of ways to reduce traffic congestion at far less cost than a new rail system.
No city in the U.S. has come anywhere close to meeting its cost and ridership projections. By the federal government's own standards of a $6 threshold per new rider, every new rail system has been a failure. Because of the conspicuous failure of all these other rail systems the onus of proof is not on the critics, but on the City to show why its projections should be believed.

The City must explain how it could have ridership that is 80% that of San Francisco’s entire BART system. The City has to explain how it can justify ridership that is 50% greater per line mile than any other system in the U.S. It is not enough to say that, "UMTA says they are 'conservative'." First, UMTA denies saying that City projections are conservative and second, UMTA approved the projections of all the other systems and they turned out to all be disastrously wrong.

We would also like to remind the City that it has totally ignored the one alternative that guarantees to relieve traffic congestion. Jeremy Harris keeps talking about the hundreds of studies that the State and City have done on the traffic situation. What he does not say is that in all these studies only one alternative is shown to reduce traffic congestion below current levels and that is road pricing.

But the City has buried the subject of road pricing so deep that the average person has not even heard of it. The City is so intent on the rail system that it is not considering anything else.

In summation, there are many alternative ways to get people off the road successfully and cost effectively. Rail is not one of them.
COST!

Committee On Sensible Transit
1520 Liona Street, 3rd Floor
Honolulu, Hawaii 96814
FAX 946-0406

TESTIMONY OF THE COMMITTEE ON SENSIBLE TRANSIT CONCERNING THE AA/DEIS

The membership of the COST! organization is opposed to any of the alternatives presented in the AA/DEIS on the grounds that:

1. They do not adequately explore the potential contribution that could be made by the private sector in the provision of peak hour service.

2. They do not explore the possibilities of road pricing, which in the HALI 2000 Study was the only alternative that projected a reduction in traffic congestion.

3. They do not consider the contribution that could be made by exclusive busways as proposed in the new Federal Highway Transportation Policy. If there is room for an elevated rail system from Waiawa to downtown, then there is room for an elevated busway.

We further believe that the AA/DEIS is defective in that:

1. The ridership projections are not realistic because:

   A. The basic formula for projecting bus ridership through the year 2005 is flawed. The formula projection using a base year of FY 1984 would lead to a greatly increased bus ridership by FY 1989. However, FY 1989 ridership was actually below that of FY 1984.

   B. Inadequate consideration is being given to the detrimental effects of changing the existing bus system into a feeder bus system. The changes, as projected in the bus system for Alternative #3, will essentially gut the existing urban trunk routes and severely impact existing bus ridership. We
foresee that this attempt to force riders onto the rail system will lead to a net loss in transit ridership as has happened in other rail cities.

2. Our engineers tell us that the capital costs are understated by about 50% because:
   
   A. This community does not have the heavy construction capability of building such a system within five years without drastically escalating costs.
   
   B. That the costs, as presented, are less than what it has cost other cities to build comparable systems. This is especially unlikely because Honolulu is a notoriously high construction-cost city.

The City Administration has not seen fit to show residents the full visual and aural impacts of rail transit on the environment. These impacts will slowly dawn on people who live along the route. The outcome will be a demand for the Waikiki segment and University segment to be underground. Already condominium associations are signing petitions against rail being above ground in their area. These construction costs additions, forced by the political process, will lead to the type of cost overruns experienced by other cities.

The rail system as currently projected has all the earmarks of being Pickrell #9.

COMMITTEE ON SENSIBLE TRANSIT,

Cliff Slater
Chairman
TESTIMONY TO THE
DEPARTMENT OF TRANSPORTATION SERVICES
on the
HONOLULU RAPID TRANSIT PROJECT
Tuesday, May 8, 1990, 7:00 pm

My name is William A. Grant and I am testifying on behalf of the Downtown Improvement Association. We are a non-profit, State-Chartered business organization dedicated to the long-term development of Downtown as the State’s business headquarters. Currently we have about 400 members and are in our 32nd year of service.

DIA has supported some form of rail transit system since 1973 when we backed the HART plan. We believed then, and we believe now, that an independent, grade-separated rail line is essential for future mobility to key employment centers like Downtown. Our daytime population is currently about 54,000 persons and could reach 85,000 in 20 years.

In April we reviewed the Alternatives Analysis and Draft EIS and reaffirmed our position of support for the project, provided the route is placed in a subway configuration under Hotel Street for environmental reasons which we feel are obvious.

Recently, we were very pleased to learn that the technical evaluation by the Department of Transportation Services staff has recommended the Hotel Street Subway through Downtown and that this recommendation has been approved by Mayor Fasi and sent to the City Council for final action. By making that recommendation, our earlier concerns about a possible elevated transit line on Nimitz Highway, have been completely removed.

It is our hope that with support now committed by the Mayor, the Governor, the Legislature and Federal Agencies, the City Council will give the project the final go-ahead so that a great many Downtown commuters can look forward to an alternative form of getting to work a few years from now.
Foster Village Community Association  
Honolulu, HI 96818

Department of Transportation Services  
City and County of Honolulu

COMMENTS ON THE ALTERNATIVES ANALYSIS/DRAFT ENVIRONMENTAL IMPACT STATEMENT (AA/DEIS) FOR THE HONOLULU RAPID TRANSIT DEVELOPMENT PROJECT

I am a property owner and President of the Foster Village Community Association.

My comments represent the view of many of the Board of Directors and concern the alternate alignment options in the Salt Lake/Airport area.

The Board of Directors agree with the conclusions and recommendations of the CITIZEN REPORT of the Honolulu Rapid Transit Development Project Study of April 1990 that indicates 80% of the participants favor the alignment of Kamehameha Highway rather than Salt Lake Boulevard.

We also note that an article in the Honolulu Star Bulletin of 3 May 1990 indicates that the city Department of Transportation Services already has a route recommendation which follows Kamehameha Highway, rather than Salt Lake Boulevard.

The Salt Lake route would bring too much noise, pollution and congestion to an already crowded area, and the stations would still be far enough from most residents to require shuttle bus service. We are concerned about increased traffic on Salt Lake Boulevard since 3 schools are located on it, with many children walking to and from school. The distractions of a mass transit system running past Makalapa Elementary, Aliamanu Intermediate, and Radford High School, as well as the noise generated by the construction and operation of the system will adversely affect our children and the quality of education in this area.

We are looking forward to riding the new system, however we would rather drive or take a shuttle bus to the Aloha Stadium station and board it there to avoid the noise and congestion it would bring to our neighborhood.

Very Respectfully,

 signature

Marjorie Padua
My name is Gary W. Rodrigues and I appear here on behalf of the Hawaii State AFL-CIO.

The Hawaii State AFL-CIO supports mass transit development on Oahu.

Now that the Hawaii State Legislature has passed the necessary legislation designating the method and dedicated source of funding as well as received assurances from federal sources of revenue, it is time to move ahead on Mass Transit development for Oahu.

The Alternatives Analysis Draft Environmental Impact Statement, which is the subject of this public hearing, present three basic options: 1) status quo; 2) expanded bus system; and 3) concept of the fixed guideways system.

We support a fixed rail rapid transit system for the City and County of Honolulu and agree with those who believe that transportation of individuals by a fixed rail rapid transit system is a viable means of decreasing the number of motor vehicles on our highways.

Thank you for the opportunity to present our comments.
May 22, 1990

Mr. Amar Sappal
Project Manager
Rapid Transit Development Division
720 Kapiolani Boulevard, Third Floor
Honolulu, Hawaii 96813

Dear Mr. Sappal:

Subject: American Society of Civil Engineers Transit Position Paper for the Rapid Transit Alternative Analysis/Draft EIS

In response to the draft environmental impact statement for rapid transit development on Oahu, transmitted herewith is the Hawaii Section - American Society of Civil Engineers (ASCE) position on the development of rapid transit on Oahu. We thank you for this opportunity to comment on this important issue.

Sincerely yours,

[Signature]

Masanobu Fujioka
President
Hawaii Section - American Society of Civil Engineers
Our community needs to move towards a better balance in its transportation system if we are to meet today’s and tomorrow’s travel needs of our citizens. This system needs to be of various types requiring short-term, inexpensive improvements, paratransit investments, and major facility projects. Oahu is expected to have 25% more population, and 15% more jobs by 2010. To provide similar travel qualities by each of mode for the change in transportation demand, the public transit part of Oahu’s present transportation system should be upgraded and expanded.

Honolulu must accept the need to make major facility investments in its transportation infrastructure if it desires improvements. It should have a public transit system composed of a fixed guideway system, express buses, and feeder buses, all coordinated to provide efficient service to Oahu’s residents and visitors.

An efficient, well-coordinated public transportation system can become an integral and essential part of our community. It will provide mobility to the transit dependent segment of our community, provide economic benefits, reduce pollution, permit more efficient use of our existing streets and highways, reinforce land use planning, and conserve energy. With the potential for providing these benefits to the community, public transit
should be viewed as an essential public service similar to police services, fire protection, and education. As an essential public service the community should be willing to provide the necessary funds to build, operate and maintain such a service.

Straight-forward action is needed. There is an urgency to the overwhelming transportation problem that faces us in the future. The long lead time required to develop a solution to this problem is such that we must start now. The public must be informed of the advantages of having good public transit available and the cost of providing quality transportation, and must be encouraged to use what is available today. The Hawaii Section of the American Society of Civil Engineers finds the need as clear now as we did over a decade ago. We have prepared this Position Paper to provide information to the residents of Oahu.

BACKGROUND

During the last half century, our way of life has increasingly placed heavy reliance on the automobile for transportation. This fact is starkly brought to light in the daily traffic congestion we encounter, and the decreasing tolerance of driving in congested traffic during our trips to and from work. To limit the increasing time and costs spent in commuting to and from work, we who live and work on Oahu should strive for a total transportation system that will allow us to attain a better balance in our use. To this end, the Hawaii Section of the American Society of Civil Engineers has decided to state its position on the question of future public transit for Oahu.
Defining Oahu's Transportation Problem

The fact that people do not live where they work shapes the magnitude of Oahu's home-to-work transportation problem. Adding to this problem are the topography of Oahu, centralized work areas, such as downtown Honolulu, and the combining of work trips with school and other trips. Waikiki and the University of Hawaii at Manoa are major trip generators. Our residential population is moving toward Ewa and Central Oahu, increasing the amount of travel from the West to Downtown and these major generators. Clearly, traffic congestion in the Primary Urban Center will only increase.

The major development of the Ewa Plain and Kapolei City will serve to reduce the need to travel to the PUC. However, it will not replace the need for stemming the continuing growth in traffic demand in the PUC which will remain as the major employment region for Oahu.

In 1985, Oahu's population was 811,094. The most recent planning data indicates a population of 1,0313,000 for Oahu by the year 2010. In order to plan for this type of growth Oahu's General Plan contains policies which will dictate the location of employment and distribution of population on Oahu. In planning for an almost 25% increase in the population of Oahu, it becomes obvious that major changes in the travel habits of Oahu's residents and visitors will be essential.

The capacity of the existing highway system in urban Honolulu has nearly been reached and no new major freeway facilities through the densely built-up urban areas are presently planned due to limited land availability and adverse environmental and social-economic impacts. The recently completed Honolulu Waterfront Master Plan, assumed a high
capacity system, and still found significant road capacity shortfalls in the Primary Urban Center. Therefore, public transit must be available to meet the future demand to travel. Our existing streets and highways are strained and we already experience peak traffic conditions when we are going to work or returning home.

Downtown Honolulu is expected to have several unique problems which further demonstrates the need for a good transit system. These problems center about the capacity of the downtown street system to handle added future automobile and bus traffic, and the availability of sufficient numbers of parking spaces to satisfy demand. Downtown Honolulu will continue as a major center of work trips on the island. However, the local street and highway systems through the area are at capacity today and cannot accommodate any major increase in additional automobiles or buses which would be used by the growth in population. Further, parking spaces in the downtown area are at a premium as evidenced by the present high cost of parking stalls. As the demand for parking rises faster than the construction of new parking stalls the cost of parking can be expected to rise accordingly.

**Recommended Transportation System**

The solution to our present and future transportation problem rests in the development of a "balanced" transportation system consisting of the private automobile, paratransit services, and an extensive public transit system that is both attractive and responsive.

The private automobile in recent decades has dominated urban transportation development and consequently has been instrumental in the shaping of our current urban form and way of life. This way of life is
reflected by dispersal, suburban residential communities, shopping centers, and increased mobility. Because of its convenience, the private automobile will continue to play a dominant role in our transportation system.

To provide an attractive alternative to automobiles, it is necessary to develop a public transit system that is attractive and responsive to our demands for transportation. Our public transit system must perform the task of providing service between our widely dispersed residential areas and our major activity centers of employment, shopping, recreation, etc. To do this our transit system must perform the following functions:

- Better collection and distribution in the residential areas.

- Better line-haul service between major areas of trip origin and destination and especially through downtown Honolulu.

- Better internal circulation in high-density areas such as downtown Honolulu.

To perform all of these functions well requires a public transit system consisting of different types of vehicles. The type of transit system selected must be matched to the function it is to perform. Buses, because of their size and flexibility of operation, are excellent as distributors and feeders in both widely dispersed residential areas and densely developed areas. Buses can also perform a line-haul function, however, there are practical limits as to how many persons can be served during the peak hours. A fixed guideway system best performs the role of a high capacity, high-speed, line-haul system. Within a minimum of right-of-way it can penetrate into and through densely developed areas such as downtown Honolulu. In many
major cities of the world fixed guideway serves as the spine of the city's transit system. This transit spine is fed by many collector/distributor bus lines (local buses) and is supplemented by express bus lines.

Honolulu lies in a very narrow and long corridor formed by the Koolaus on the mauka side and the ocean on the makai side. Located within this narrow corridor, where development is dense, are our major employment and activity centers. Our residential areas are located in valleys reaching away from this narrow corridor and in clusters scattered from leeward to windward Oahu. Fixed guideway along the densely built-up narrow corridor, supplemented by feeder and express buses, in combination with the private automobile would provide us with viable commuting alternatives.

Can We Afford An Expanded Public Transit System?

This question would better read: "Can we afford not to have an expanded public transit System?" An expanded transit system planned to complement our network of roads and highways is essential if we intend to maintain and improve our quality of life while accommodating an increase in population. The residents of Oahu and our community leaders must address themselves to this question of the future quality of life that we want.

Nothing is free in this world and this applies to transportation as well. To answer the question "Can we afford to pay for an expanded public transit system?" we need to first examine and determine the type of community and quality of life that we would like to have in the future, consider the transportation options that will assist us to achieve the desired quality of life and then decide if we are willing or able to pay the cost. It comes down to a question of are we willing to pay the cost of effective public transit.
Foresight is needed to perceive the magnitude of our future transportation problem and to decide on the best solution to solve that problem. Because of the lead times required to build and put into operation a public mass transit system, we must commit ourselves now to building our public transit system always keeping in mind our final goal. An important part of this commitment must be to develop community acceptance of the need for transit and to encourage the community to use public transit. We applaud and acknowledge the passage of legislation to provide State support of Honolulu’s public transit.

**What Are the Next Steps?**

To this end the Hawaii Section of the American Society of Civil Engineers through its membership is prepared to provide information to the residents of Oahu on this vital issue of transit for Oahu. Member individuals and firms have the professional responsibility and capability to provide the necessary leadership in the planning, design, and construction of a public transit system. Civil engineers are knowledgeable and experienced in societal, environmental, physical, and fiscal issues regarding such large public works projects. The Hawaii Chapter stands ready to provide information about the benefits of providing a high quality transit system such as reduction of air pollution, greater accessibility to congested employment centers, gasoline consumption, and travel delays.
May 8, 1990

TESTIMONY ON THE ALTERNATIVES ANALYSIS AND
DRAFT ENVIRONMENTAL IMPACT STATEMENT OF THE
HONOLULU RAPID TRANSIT DEVELOPMENT PROJECT

I am Gareth Sakakida, Managing Director of the Hawaii Transportation Association. I am presenting testimony on behalf of the motor coach segment of our Passenger Carrier Conference.

We have received comments from some of these members who are interested and capable of supplementing the City's public transit fleet to meet the growing public transportation demand.

The inventory of PUC certificated passenger vehicles on Oahu follows:

- Over 17 passenger capacity: 384
- 8 to 17 passenger capacity: 597
- 1 to 7 passenger capacity: 379

In addition, 1,546 vehicles are licensed as taxicabs under the City & County of Honolulu.

Oahu's private transportation sector represents a substantial resource of vehicles, drivers, dispatchers and management expertise to help meet the City's morning and afternoon peak hour needs for public transit.

The private sector offers instant capacity to utilize comfortable, premium quality vehicles at a substantially lower operating cost than the current system. The City then stands to avoid huge capital, operating and maintenance costs by supplementing their fleet with the private fleets.

Under Alternative Two (TSM), the costs projected are pegged at the City's cost of purchasing, operating, and maintaining buses, which boosts the cost of that alternative, compared to a cost utilizing private sector fleets to supplement the system during the peak hours. This may be a crucial factor when reviewing the alternatives.
Should a fixed guideway be deemed the most appropriate system, the industry could still be used to augment the feeder fleet.

Initially, the industry was concerned about the current favored route, or Alternate 3, going by the Arizona Memorial and the Honolulu International Airport because of the possible displacement of current commercial bus service to and from these destinations. However, upon further investigation, we find the market impact of a fixed guideway involving these destinations will be negligible.

Our concern then turned to the concept and cost of a mass transit system. We believed the concept to be one of giving the commuter an alternative, yet Alternate 3 seems to veer away from a densely populated area (Salt Lake) compared to Alternative 4.

Alternative 3 also costs more to build, can accommodate less transit trips, offer less peak capacity, and generate less revenue than Alternative 4. Therefore, the logic of Alternative 3 being the favored route, if indeed it is, escapes us.

In conclusion, the industry is willing to work with all concerned to promote an effective, public transportation system.

Thank you.
May 14, 1990

Mr. Benjamin B. Lee,
Chief Planning Officer
Department of General Planning
City & County of Honolulu
650 South King Street, 8th Floor
Honolulu, Hawaii 96813

SUPPLEMENTAL TESTIMONY TO HAWAII TRANSPORTATION ASSOCIATION'S
ORIGINAL TESTIMONY DATED MAY 1, 1990 ON THE ADEQUACY OF THE
HONOLULU RAPID TRANSIT DEVELOPMENT PROJECT

I am Gareth Sakakida, Managing Director of the Hawaii Transportation Association. My supplemental testimony focuses on comments from a portion of our motor coach segment, and from the smaller vehicle segment (1 to 7 passengers and 8 to 17 passengers), of our Passenger Carrier Conference.

Our original testimony contained comments from the portion of the motor coach segment that primarily services group tours. This is due to the fact that we were not able to poll enough of our membership at the time the testimony was being developed for the hearing.

This supplement is important because of the difference of operation for the motor coach operations serving FITs (Free Independent Travelers) as opposed to those serving group tours. The smaller vehicle operations also serve the FIT market heavily.

The carriers who service the FIT market strongly oppose the route designated by Alternative 3 (which services the Airport). Such a route would greatly impact the survival of all the carriers providing this type of service. It is anticipated that over 2,000 PUC vehicles and taxicabs would be economically displaced with Alternative 3.

Instead of having a fixed guideway service an area that is already served by an efficient system (buses and vans instead of automobiles), it should directly serve an area that has a high density profile with a large number of drivers such as the Salt Lake area.

The Passenger Carrier Conference as a whole is in concert with the concept that an alternative servicing Salt Lake Boulevard is in everyone's better interest based on cost, carrying capacity, and the servicing of a high population density area.
The industry would also like to reiterate (from our original testimony) that it can augment the City’s transit fleet to reduce the City’s overall cost in a scenario that involves Alternative 2 (TSM) which may change the entire complexion of that Alternative.

Such an augmentation will also work in a feeder bus scenario in the case that a fixed guideway is the selected system.

Again, the industry is willing to work with all concerned to promote an effective public transportation system.

Thank you.

cc: Mr. Amar Sappal
May 22, 1990

Mr. Benjamin B. Lee, Chief Planning Officer
Department of General Planning
City and County of Honolulu
650 South King Street, 8th Floor
Honolulu, HI 96813

RE: ALTERNATIVES ANALYSIS/DRAFT ENVIRONMENTAL IMPACT STATEMENT, HONOLULU RAPID TRANSIT DEVELOPMENT PROJECT

Dear Mr. Lee:

We appreciate the opportunity to review and comment on the above draft EIS. Members of our Preservation Review Committee met and submit the following recommendations for your consideration:

Of the three transit alternatives through downtown and the Chinatown Historic District, we strongly support the underground alternative for its visual sensitivity to the historic buildings and sites along the route. Honolulu is historically a waterfront oriented city and that history is best honored by keeping the mauka/makai view planes clear.

We recommend that the tunneling involve the best possible monitoring and mitigation methods to prevent any damage to historic buildings and sites.

We also recommend that ingress and egress stations be sensitively designed on an individual basis in relation to the history of the neighborhoods in which they are to be located.

Since federal as well as state and City/County participation is involved in the project, we encourage your support for the preservation processes at all levels of government which have been established to protect and preserve historic buildings, objects, sites and districts.

We wish you well in the development.

Sincerely yours,

Phyllis G. Fox
President

cc: Mr. Amar Sappal, Project Manager
Kakaako Improvement Association, Inc.

P.O. Box 2319, Honolulu, Hawaii 96812

Mr. Benjamin B. Lee, Chief Planning Officer
City & County of Honolulu

Mr. Amar Sappal, Project Manager
Department of Transportation Services
City & County of Honolulu

Re: Comments on the Draft EIS of Alternative Analysis - Mass Transit

Since Kakaako would be greatly impacted by any of the proposed alignments for a fixed guideway through the area, the Kakaako Improvement Association (KIA) submits the following comments on the above Draft EIS:

General: Unfortunately it appears that some criteria used in proposing guideway's route through Kakaako is based, consciously or unconsciously, on the theory that Kakaako has "second-class" status. First there is an obvious absence of discussion about possibly "undergrounding" the guideway through some portions of Kakaako to avoid the unsightly and deleterious impacts of erecting an elevated structure throughout the length of an urban area. If it is meritorious to consider "undergrounding" the system in the downtown area, then it is equally meritorious to consider "undergrounding" it elsewhere.

Secondly, despite the fact that the NBC complex will be a major "generator" for mass transit and conducive of an on-line station; and despite the fact that the natural "locus of points" between the civic center and Ala Moana shopping center is Kapiolani Boulevard, there is no proposed alignment along Kapiolani Boulevard. Instead the only alignment between Ward Ave. and the shopping center, "shoe-horns" the guideway into a narrow "back-street" section of Kakaako - Waimanu/Kona Sts. The Kapiolani corridor should be evaluated publically as an "alternative" to the proposed route.

For these reasons and for a lack of enthusiasm for the need and benefit of a fixed guideway, our priority 1 alternative is "no-build" with a reliance on TSM to make improvements in transit.
Comments on Proposed alignments of the guideway:

1. Kapiolani Boulevard should be included as a viable (and desirable) route.

2. If a fixed guideway is to be built through Kakaako, we prefer the Pohukaina St. route on the strength of the theory that it should be centrally located within the geographic area served to be the most effective. However, this preference is qualified heavily by the feeling that if the line travels on Pohukaina St. then the Ward Ave. segment should be underground. The aesthetics of Ward Ave., present and future, demand that we avoid impacting it adversely with an elevated structure for a train. Consequently, the preference for Pohukaina is predicated upon a subway mode for the system on Ward to Waimanu or Kapiolani.

3. Obviously, in our thinking, the deleterious effects from an elevated structure balance, or outweigh, any beneficial effects to properties abutting or in the vicinity of the mass transit line. These specific impacts for abutting properties should be evaluated when the actual alignment is set and preliminary designs are available. In light of this, it would be counter-productive to attempt to assess abutting, or neighboring, properties for a portion of the cost of the system. It would also be unfair.

Very truly yours,

[Signature]
Donald A. Bremner
President
My name is Arlene Kim Ellis and I am President of the League of Women Voters of Honolulu.

We are still reviewing the AA-DEIS and will submit a more detailed statement before the May 23 deadline, though we have requested a reason able extention so that groups like Neighborhood Boards will be able to make more detailed studies than is possible in the time now allotted.

Today we are only summarizing some of our major questions.

Generally we are confining our statements to what we think are short-comings in the way the alternatives are presented, rather than the pros and cons of the alternatives themselves. We are also confining our comments to the three major alternatives -- no-build, TSM-bus, and rail and not to the differences between rail alternatives.

1. Why is the draft organized in such a way that the public cannot easily find much of the basic information it needs in order to understand and weigh the differences between alternatives? For example rail ridership projections in earlier drafts of the project proposal were deleted from the Summary Table (p. S-31) and can only be found, for each alternative, by plowing through over 200 pages of the draft's 320, and computing them from Tables 4.10 through 4.18. Why were these taken out of the summary?

2. Similarly, a basic cost comparison -- the total combined annualized capital and annual operating and maintenance costs for each alternative, requires the public to search through 300 pages, almost to the end of the document. Why could not these, too, have been up front in the summary table or elsewhere?

3. The AA-DEIS is supposed to be even-handed in its analysis of the alternatives and not to favor one over the other. Why, then, is the vast majority of the draft's discussions confined to the rail alternatives, with only a cursory treatment of no-build and TSM-bus? Why are there no maps of bus routes?
4. The Cost Effectiveness Index (CEI) is said to be an important factor in weighing alternatives. In the AA-DEIS it is shown (Table 6.1) only for the rail alternatives compared with TSM-bus. Why was it not also computed for TSM-bus compared with no-build? Using the same methodology and pro-rating the value of time savings from Tables 6.12 and 6.13, we found that the C.E.I. of the TSM-bus alternative compared with no-build would be $4.10 per new ride -- lower than any rail alternative, whether calculated from either no-build or TSM-bus, and including even the cheapest and shortest rail alternative. Why was there no consideration of the TSM-bus alternative's C.E.I.?

5. We have questions about both the rail ridership and total transit ridership projections. As to rail, the 163,000 daily rail trips in 2005 would be a ratio of 16.7 per 100 population, compared with 1.9 in Baltimore, 1.2 in Miami, 1.2 in Sacramento, 1.3 in Pittsburgh, 1.5 in Portland, etc., all with populations far higher than Oahu's. Even in Vancouver, with a population nearly twice ours and a rail system comparable to what is planned here, the rate is only 5.0. Even allowing for Honolulu's high bus ridership and particular geography, is such a discrepancy credible, or are we seeing, as in so many other cities which have recently built rail systems, projections three times what actual ridership turns out to be?

6. Going to total transit ridership, the no-build projection for 2005 shows only 4,900 more bus patrons than in 1986 -- an increase of 2.6% -- though the population growth projected in our General Plan is 150,000 from that date to 2005, or 18%. This small transit growth would be in spite of extensive highway improvements already in the pipeline which would cost over $150 million. The AA-DEIS indicates that is because in peak periods "the buses would be traveling at lower speeds on increasingly congested streets...and thus providing poorer service." This may be true, but how would people benefit by abandoning the bus and driving their cars through these same congested streets? Is this another example of loading the dice in favor of rail, particularly since the AA-DEIS projects a decrease of only 1% or 2% in automobile traffic volumes if rail is built?

7. Similarly, is not the TSM-bus alternative structured to show an unrealistic increase in the number of buses and also in capital costs and O & M costs? Again, these tend to exaggerate rail's advantages over this alternative. We should also point out that TSM-best bus
does not include some of the measures commonly mentioned for “rapid bus transit” systems, such as exclusive bus lanes, integration with para-transit modes like 12- or 15-passenger vans, road-pricing or metering, etc., which are designed to reduce automobile traffic and help buses move better. Could not a TSM-bus alternative have been structured this way, creating a better comparison with rail? And what about quiet, efficient, economical electric articulated buses?

8. Some of the premises underlying the alternatives seem to us to be questionable. For example, the average trip time projected to be saved with rail as against TSM—best bus is about 8 minutes. Assuming that this correctly allowed for walking, transfer and waiting time, it is not still a flawed comparison since buses stop every block or two whereas rail stops every half or three-quarter mile? How would the respective travel times have changed if bus stops were at comparable distances to rail? And assuming rail times were based on two-minute intervals, how much would rail travel time's advantage have been lessened if the interval were more realistic -- say, four or five minutes, especially if ridership is lower than projected, as in many other cities?

9. The present fare structure, on which ridership projections were based, produces an average fare per ride of $.25 to .30. If the costs of building rail result in fares typical of other cities in the $1.00 to $1.50 range, how will this affect ridership? Since such increases are more likely with rail than without it, would not ridership be affected more adversely under the rail alternative than the TSM-no build, assuming a constant revenue-to-cost ratio?

These are just a few of our questions about the way the alternatives are structured and analyzed. Short-changing the non-rail alternatives does a disservice not only to the public but to the credibility of the rail alternative itself. We urge that this be addressed in the final AA-DEIS so that the public can make an intelligent decision on this vital matter -- whether to go for no-build, TSM-bus, or rail -- on the basis of unbiased and intelligible data.

Thank you.
THE LEAGUE
OF WOMEN VOTERS OF HONOLULU

Mr. Benjamin B. Lee, Chief Planning Officer
Department of General Planning
City and County of Honolulu
650 South King Street, 8th Floor
Honolulu, Hawaii 96813

Mr. Amar Sappal, Project Manager
Department of Transportation Services, RTDD
City and County of Honolulu
650 South King Street, Third Floor
Honolulu, Hawaii 96813

Gentlemen:

Thank you for the opportunity to comment on the AA-DEIS for the Honolulu RTD project. We submitted testimony at the May 8 public hearing, but limited it to criticisms of the AA-DEIS itself and what we considered shortcomings in the way the alternatives were formulated and presented, rather than to an evaluation of the alternatives themselves. We are now summarizing that statement and adding our comments on the three main options -- no-build, TSM-bus, or rail, and also the alternative preferred by the League after six months of study, several membership meetings, and returns to a questionnaire distributed to our entire membership.

At a meeting May 18, we concluded, with about 80% concurrence, that we cannot support any of the rail alternatives; that the no-build option is unacceptable in view of the island's growing traffic and transit problems; and that we must therefore choose the TSM-bus alternative as the only viable basis for future action. This is in spite of the fact that we think that as structured in the AA-DEIS, it over-emphasizes simply... adding more buses but does not include, so far as we could determine from the scanty description given in the AA-DEIS, consideration of such additional measures as would develop a true "bus rapid transit" system giving priority and precedence to transit vehicles over private automobiles, such as bus-only lanes in congested locations, selected grade separations at key intersections on bus routes, possibly a short bus subway downtown, and various para-transit programs to encourage private as well as public provision of mini-buses, vans, computerized ride-sharing, etc.

Such a system, we believe, could attract enough additional riders to narrow or close the gap -- 25,000 daily rides as now projected between TSM-bus and the average of the six full-length rail alternatives, or 17,000 compared with the average of the three MOS options -- at a capital cost not necessarily higher than that projected for the TSM-bus as now structured, but certainly far lower than for a rail system.

Though we must question some of the projections in the AA-DEIS for such items as ridership, we are in no position to dispute their premises or methodology or develop what we might consider more realistic ones. We therefore are basing our comments on the data and projections of the AA-DEIS.
General Comments

1. The lay public, in something like 55 days, cannot adequately analyze the complex results of years of work by professional planners and engineers at the cost of millions of tax dollars. Like many documents of its kind, the AA-DEIS essentially presents data and arguments in support of what its contracting agency is proposing, and gives only cursory treatment to the alternatives not favored. We do, however, find it to be more objective and credible than its ten-year old predecessor, the AA-EIS prepared for the Honolulu Area Rapid Transit (HART) proposal.

2. To whatever extent the current AA-DEIS may -- consciously or unconsciously -- appear to favor the rail alternatives, a careful study of the data and projections presented does not, in our opinion, by any means lead to the conclusion that rail would be the preferred course of action for Honolulu at this time.

3. Many of the important criteria and factors needed to evaluate the alternatives are not easily found in the report, except by ploughing through many pages of text, tables, and graphics. An index would have been helpful. The Executive Summary does not include such comparative data for the alternatives as the projected number of rail guideway users, or the total annualized cost -- for capital as well as maintenance and operations -- of each option. (We note that the rail ridership projections have now been added in the current Transit News Letter #4 dated April, 1990.)

4. We also must question the structure of the alternatives presented, though we are told that these had to follow Federal guidelines rather than reality. The no-build projections show an increase by 2005 of only 2.6% from the current level of bus ridership shown in the AA-DEIS -- actually they show a decrease from the usual current ridership counts, after allowance for transfers, which are found in various official publications. The AA-DEIS shows a decrease in relative daily bus ridership from the current level of 25 per 100 population to 19 in 2005 -- said to be due to poorer bus service caused by greater traffic congestion. This is said to be in spite of inclusion in the no-build alternative of a $150 million worth of highway improvements, the re-assignment of bus routes better to meet the demand, additional park-and-ride and maintenance facilities, etc. How will it benefit people to use their cars rather than the bus if they have to cope with this same congestion?

5. The TSM-bus alternative, on the other hand, is made to show so great an increase in the number of buses required, and hence in operating and maintenance costs as well as capital costs, as to put it in an unfavorable light in comparison with rail. It shows an increase of 110% in the number of buses, and of 192% in capital costs, over no-build, to produce a 19.2 % increase in riders. In fact, riders only increase 22.2% over their present volume. These projections are in spite of the expenditure of $383 million for new buses, maximum TSM improvements, park-and-ride facilities, etc. Does the TSM alternative, as structured, make any sense except as a straw man to be knocked down by rail?

6. In spite of this, daily 2005 transit ridership, with rail, is projected from data in the AA-DEIS to be only 25,000 more than with TSM-bus. Even assuming for now that the entire reduction is in peak periods, we are talking about only 10,000 fewer cars on the road in each peak period -- about 4% of 1980 Census totals for cars used between home and work all day, and an even smaller percent in 2005.

7. Total automobile vehicle miles traveled in 2005 show similar small reductions with a rail system in place from what they would be with TSM-bus, even when the differences are adjusted to allow for the greater impact of buses on the roads. How can the environmental, health, energy and other benefits of rail be meaningful, with such insignificant reductions in automobile usage?
Evaluation of No-build, TSM-Bus, Rail

As suggested in the April 1990 HRT News Letter #4, we will group our discussion of alternatives under the six "Evaluation Measures" listed therein. Our studies did not include an evaluation as between rail alternatives, but only as between no-build, TSM-bus, and rail generally, though for some purposes we split rail into the full-length and the MOS options, each as a group.

1. Costs

We believe that the costs of a rail system need to be looked at not only in absolute terms but also in relation to who and how many will benefit from it and who and how many will pay how much for it. We have concluded that the projected high capital costs of rail, even when combined with its slightly lower operating costs, cannot be justified by the limited increase in total transit ridership shown in the AA-DEIS as compared with the TSM-bus alternative. We attach a data sheet used in our studies, which shows the following in relation to costs:

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<th>Compared with TSM-Bus Alternative</th>
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<tr>
<td>Full-length Rail</td>
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<td>Increase in annualized capital costs</td>
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<td>(from line 13)</td>
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<td>Decrease in annualized O &amp; M costs</td>
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<td>Increase in annualized total costs</td>
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<tr>
<td>Increase, average cost per ride, over-all</td>
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<td>Short (NO) Rail</td>
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<td>Increase in annualized capital costs</td>
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<tr>
<td>Increase in annualized total costs</td>
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| A full-length rail system would have to attract 374,500 daily riders -- 120,000 or 47.1% more than projected -- to bring its average cost per ride down to what line 17 shows for TSM-bus. The relationship between costs and other evaluation measures will be discussed below.

2. Transportation Impacts

The high costs of a rail system could still be justified, we believe, if the resulting reduction in automobile traffic were enough materially to affect highway traffic congestion or if greatly increased transit ridership resulted. But the AA-DEIS does not show either of these to be the case. Again, from the attached study table, the following can be seen: (Headings as above)

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<td>Incr in total transit trips</td>
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<td>(from line 3)</td>
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<td>Transit trips as a percent of total daily trips</td>
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<td>(from line 3 and line 2)</td>
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<td>Increase in this ratio in percentage points over TSM-bus's 7.63%</td>
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<tr>
<td>Rail guideway trips as percent of total trips</td>
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<td>(from line 4 and line 2)</td>
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<td>Increase in transit trips to &amp; from downtown</td>
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<td>(from line 7)</td>
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<td>Decrease in total auto vehicle miles</td>
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Compared with TSM-Bus Alternative

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<tr>
<th></th>
<th>Full-length rail</th>
<th>Short (MDS) Rail</th>
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<tbody>
<tr>
<td>Decrease in total vehicle miles, adjusting for buses [a]</td>
<td>3.1%</td>
<td>NA</td>
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<tr>
<td>Decrease in transit time per trip [b]</td>
<td>8.1 min.</td>
<td>5.9 min.</td>
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<td>Decrease in highway travel time per trip [c]</td>
<td>1.2 min.</td>
<td>1.2 min.</td>
</tr>
<tr>
<td>Weighted average decrease, all trips (from lines 2 and 3)</td>
<td>1.6 min.</td>
<td>1.6 min.</td>
</tr>
</tbody>
</table>

We note that the transit time decreases projected in the AA-DEIS for rail are predicated on two-minute train headways, which in turn are based on the high rail ridership projected. As this is several-fold the ridership ratio in other cities such as Vancouver and might be significantly reduced if higher fares were instituted in the proportion of costs covered by the fare-box, longer intervals between trains might be necessary and would reduce the projected time savings.

3. Environmental Impacts

We have not been able, in the time available, to review the details of most of the environmental factors discussed in the AA-DEIS, but we have a few comments to make on selected points:

a. Air Pollution

From the attached table, line 11, only minimal air pollution impacts are shown as cited in the AA-DEIS, p. 5-40, between TSM-bus and rail. This could hardly have been otherwise in view of the small decreases shown on line 8 for vehicle mileage. Even with the considerable decrease in bus mileage projected for the rail alternatives, as shown on p. 5-28 of the AA-DEIS, the over-all decrease in pollution is insignificant. The use of electric buses, which we have long advocated, could cut road pollution, though if dependent upon fossil fuel for power generation, may not reduce island-wide pollution.

Our analysis revealed the following from the attached table, line 11 (Headings as above):

<table>
<thead>
<tr>
<th></th>
<th>1.0 percentage points</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Decrease in C.O.</td>
<td>1.2</td>
<td>NA</td>
</tr>
<tr>
<td>Decrease in HC</td>
<td>2.7</td>
<td>NA</td>
</tr>
<tr>
<td>Decrease in SO</td>
<td>3.7</td>
<td>NA</td>
</tr>
<tr>
<td>Decrease in PM</td>
<td>5.2</td>
<td>NA</td>
</tr>
</tbody>
</table>

a/ Adjusting for decrease in bus miles by equating impact of one bus on the road to the impact of six automobiles

[b/] AA-DEIS, p. 6-24, average of respective alternative groups

[c/] HALI 2000, Table 6-3. 41.15 min. for TSM-bus, 39.95 min. for rail by averaging light and heavy rail
b. Noise

Experience with noise impacts in Vancouver reported by several of our members -- a system said to be a model for Honolulu -- leads us to have great concern, particularly because many of the alternative routes proposed would affect densely populated areas. "Mitigation" is always possible but not always very effective, and baffles can be aesthetically unsightly.

c. Growth Impacts

Development around stations and adjacent to the guideway route, particularly if encouraged by the kinds of height and density zoning concessions proposed for the privately financed Convention Center and often mentioned in connection with rail could, we feel, have a seriously negative impact on the neighborhoods affected. Combined with large numbers of buses and automobiles converging on the stations and increased numbers of pedestrians entering and leaving them or shopping or working in the development focused around them, these could be a real problem, particularly since park-and-ride facilities and even bus loading areas at the stations may not be possible in many areas.

d. Aesthetics

The unfavorable impact of the elevated structures proposed needs no comment from us other than to refer to the drawings on pp. 5-72, 5-78, 5-79, 5-89, etc., of the AA-DEIS. It is worth noting that the Downtown Improvement Association complains in a current issue of the "Downtowner" that elevated routes downtown "are visually and environmentally damaging...have structures which will reduce street capacity and cause traffic congestion." While we agree, we must point out that the same criticisms apply to the remaining sections of the routes.

4. Financial and Institutional Feasibility

There is considerable confusion as to the financing measures now being considered as meeting UMTA's requirements. The AA-DEIS shows two alternative possibilities with respect to an excise tax -- 1% for 6 years or 1/2% in perpetuity -- both to finance construction capital costs only (p. S-40). These differ from what the Legislature adopted last month, and indeed in response to OMPD-CAC questions, the City replied that "a perpetual 1/2% excise tax surcharge that would be used for both capital and O & M costs was considered in the AA-DEIS, but this option would likely not be pursued by the City." (HRTDP, "Responses to Questions Generated by the OMPD-CAC, April 25, 1990, p. 19).

Be that as it may, and whatever smoke and mirrors are used, we are talking about a capital cost for a rail system of about $5,000 per average Oahu household, and an annual deficit, above fare-box revenues, for debt service and O & M, of about $750 per household, at present cost projections. A 1/2% excise tax surcharge would raise about $275 per household per year, of which perhaps $75 could be extracted from tourists. The so-called surcharge credit just adopted would return an average of $170 per average household, ranging from $18 for very low-income families to $400 or more for those with incomes approximating $100,000 or more. (We will discuss this further under the section on Equity.)

The AA-DEIS and the City have suggested many other revenue sources to supplement the scant 10% of total costs projected to be derived from fares at present levels. Many of these assume complicated arrangements with private developers or investors which may or may not materialize, especially in view of the losses most new rail
systems are experiencing. Pressures to increase fares to two or three times the present level can be expected, but at best they would still bring in only 20% or 30% of total costs, and such increases would in all likelihood reduce ridership significantly.

The various short-falls indicated in the AA-DEIS are staggering. Were they to be met out of either existing or augmented public revenue sources, especially if debt service on bonds is involved, we fear that this would so strapp future city -- and perhaps State -- budgets as to require retrenchment in virtually all other public services and facilities, including schools, health care, housing, infrastructure, etc.

In our opinion the question is not whether we can fund a rail system, but whether we should. In view of the costs and the only marginal benefits shown in the AA-DEIS and indicated above, we think that the answer has to be "No, not at this time -- perhaps in two or three decades, if the population and transit use grow enough to sustain it." It should be remembered that the often-repeated argument that it is better to build now, before prices go up, does not take into account the opportunity costs of the money prematurely spent nor the sacrifice of future technological advances. Already it is generally admitted that to have built HART ten years ago would have been a grave mistake.

5. Cost Effectiveness

On the attached table we show on line 16 the Cost Effectiveness Index for the two groups of rail systems. In addition, we have calculated a CEI -- using, as far as possible, the same method as in the AA-DEIS -- comparing TSM-bus and rail with no-build. factor in the value of time savings, we used Tables 6-12, 6-13 and 6-18. We found the following:

<table>
<thead>
<tr>
<th>Compared with TSM-bus Alternative</th>
<th>Full-length Rail</th>
<th>Short (NOS) Rail</th>
</tr>
</thead>
<tbody>
<tr>
<td>Increase in cost per new rider per ride (from line 16)</td>
<td>115.4%</td>
<td>47.3%</td>
</tr>
<tr>
<td>Increase in average cost per ride over-all (from line 17)</td>
<td>46.9%</td>
<td>27.7%</td>
</tr>
</tbody>
</table>

These comparisons would, we believe, have been even more striking if, as we indicated previously in these comments, a TSM-bus alternative had been structured more realistically and with a less excessive outlay for new buses. Be that as it may, our attached table also shows the following:

<table>
<thead>
<tr>
<th>Compared with No-build Alternative</th>
<th>TSM-bus</th>
<th>Full-length Rail</th>
<th>Short (NOS) Rail</th>
</tr>
</thead>
<tbody>
<tr>
<td>Increase in transit ridership (from line 3)</td>
<td>19.2%</td>
<td>32.2%</td>
<td>28.0%</td>
</tr>
<tr>
<td>Increase in capital costs (from line 13)</td>
<td>137.9%</td>
<td>733.9%</td>
<td>708.0%</td>
</tr>
<tr>
<td>Increase in annualized O &amp; M costs (from line 14)</td>
<td>37.0%</td>
<td>27.3%</td>
<td>23.9%</td>
</tr>
<tr>
<td>Increase in total annualized costs (from line 15)</td>
<td>54.8%</td>
<td>152.4%</td>
<td>109.6%</td>
</tr>
<tr>
<td>Ratio of increase in total annualized costs to increase in ridership (from above)</td>
<td>2.854</td>
<td>4.733</td>
<td>3.914</td>
</tr>
<tr>
<td>Increase in average cost per ride over-all (from line 17)</td>
<td>30.7%</td>
<td>92.0%</td>
<td>48.5%</td>
</tr>
</tbody>
</table>
Compared with No-build Alternative

<table>
<thead>
<tr>
<th>Cost-Effectiveness Index</th>
<th>TSM-Bus</th>
<th>Full-length Rail</th>
<th>Short (MOS) Rail</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>$4.10</td>
<td>$6.11</td>
<td>$4.93</td>
</tr>
</tbody>
</table>

From all the above, we conclude that even as structured, the TSM-bus alternative is more cost-effective than either group of rail alternatives.

6. Equity

If fares remain at present levels, as assumed in the AA-DEIS, both the TSM-bus and the rail alternatives are projected to increase ridership from low-income areas. This is consonant with the findings of the 1980 Census, which showed home-to-work transit ridership ratios from central, lower-income areas at up to five times the ratio to all home-to-work trips found in outlying, more affluent areas.

With a uniform fare structure, this involves considerably higher fares per mile for lower-income transit users. We are not necessarily arguing for zoned fares, as we have not studied the issue, but only point this discrepancy out as a fact of life.

More important, however, in our opinion, is the question of the distribution of costs. As was noted above and on line 4 of the attached table, the AA-DEIS projects 163,000 trips fully or partially by rail in 2005 with the full-length rail alternatives and 128,600 with the MOS alternatives. Ordinarily, a person uses the same travel mode both ways for any given trip; some persons use a mode for more than one round trip; and tourists, at even one round trip by transit per visit, comprise between 10% and 15% of daily transit users. We can estimate that up to 70,000 Oahu residents out of the year 2005 projected population of 975,000, or 7.1% of the total, would be using rail on any given day. Even eliminating children, we are talking about less than 15% of the adult population. With the MOS alternatives, the proportion is even lower.

Yet, to the extent that tax revenues of one kind or another have to be used to finance the system, everyone has to pay for it. This is true of Federal funds, too — often forgotten when we speak of "the feds" picking up 30% of the costs. It is often argued that this is also true of schools, for which all of us are taxed whether we have children attending them or not. This is as it should be, but the vast majority of us have attended public schools at some time or have children who have done or will do so. Moreover, the very survival of society depends on education of its young. This can hardly be said of a rail system heavily subsidized by all but used by only a small minority.

A further inequity must be mentioned. All knowledgeable tax policy students agree that an excise tax is extremely regressive, in that a far larger proportion of the income of poor families — indeed, almost all of it — is subject to this tax, whereas wealthy families only spend a small portion of their income for basic necessities and, as home owners, pay no tax on rent, thus spending a much smaller proportion of the total income in the form of an excise tax.

Furthermore, many kinds of businesses either pay no excise tax at all or are taxed at 1% instead of 4% and, according to the legislation just passed, would not be subject to the 5% surcharge levied on the kinds of consumption goods poorer families have to buy. All of this means that the surcharge will take a considerably bigger bite out of a poor family's budget than of an affluent family's.
The surcharge credit recently enacted only makes this regressive situation worse. Unlike the present tax credit, which is higher for lower income families and phases out above $30,000, the transit credit is levied as a straight percentage of income. It rebates $18 to the $5,000 family, $36 at $10,000, $72 at $20,000, and up to $360 at $100,000 and as high as $450 at $125,000 or more.

An analysis of San Francisco’s BART (Bay Area Rapid Transit) system some years ago concluded that “clearly, the poor are paying and the rich are riding”. Will history repeat itself in Honolulu?

6. Significant Trade-Offs Between Alternatives

As was stated above, we have made no analysis as between the various rail alternatives, but only as between no-build, TSM-bus, and rail generally. We concluded that No-build solves nothing, so primarily we looked at TSM-bus as an alternative to rail. We did not find that its marginal benefits in ridership, travel time savings, decreases in traffic congestion, and operating costs were anything like an adequate trade-off for the costs, aesthetic disadvantages, and inconveniences ...(during construction and when in operation) associated with rail.

We therefore cannot support any of the rail alternatives and opt for TSM-bus as the basis of the locally preferred alternative. Hopefully, the system actually undertaken could be implemented gradually and with modifications as dictated by experience with it, and would be combined with additional measures, as suggested above, to transform it, in not too many years, into a genuine “bus rapid transit” system which will give the community benefits at least comparable to rail, and at a more reasonable and tolerable cost.

Thank you for the opportunity to comment on this most important planning and financial decision for our community.

Astrid Monson
Planning and Zoning Committee

Patricia Tummons
Transit Task Force

Arlene Kim Ellis, President


## Key Data and Projections for Analysis of Transit Alternatives

<table>
<thead>
<tr>
<th></th>
<th>Present</th>
<th>#1 (no-build)</th>
<th>#2 (TSB-bus)</th>
<th>#3-8 (full rail)</th>
<th>#9-11 (short rail)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Oahu population (975,000 in 2005)</td>
<td>855,000</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. Total Oahu daily trips, all modes (3,000,000 in 2005)</td>
<td>2,600,000</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. Transit trips week-day average -- 1989 (See below)</td>
<td>230,000</td>
<td>192,600</td>
<td>229,600</td>
<td>254,600</td>
<td>246,500</td>
</tr>
<tr>
<td>4. Rail guideway trips, WMIA</td>
<td>--</td>
<td>--</td>
<td>163,000</td>
<td>128,600</td>
<td></td>
</tr>
<tr>
<td>5. Trips by bus only, WMIA</td>
<td>187,700</td>
<td>192,600</td>
<td>229,600</td>
<td>91,600</td>
<td>117,900</td>
</tr>
<tr>
<td>6. Increase, rail over TSB-bus trips</td>
<td></td>
<td></td>
<td></td>
<td>25,000</td>
<td>16,900</td>
</tr>
<tr>
<td>7. Transit trips to (and from) downtown, WMIA (from no-build)</td>
<td>12,600</td>
<td>9,006</td>
<td>10,006</td>
<td>8,957</td>
<td>100</td>
</tr>
<tr>
<td>8. Daily auto vehicle miles &amp; change</td>
<td>9,196,800</td>
<td>9,067,100</td>
<td>8,957,100</td>
<td>8,957,100</td>
<td>NA</td>
</tr>
<tr>
<td>9. Average minutes saved per rail trip over TSB-bus</td>
<td></td>
<td></td>
<td></td>
<td>8.1</td>
<td>5.9</td>
</tr>
<tr>
<td>10. Average highway travel time per car trip, minutes</td>
<td>40.45</td>
<td>41.15</td>
<td>39.95</td>
<td>NA</td>
<td></td>
</tr>
</tbody>
</table>

| 11. Change (%) in pollution compared with no-build | C O | - 1.3 | - 2.3 | |
| N 02 | - 1.1 | - 2.3 | |
| S O2 | 0.7 | 2.5 | |
| 12. Total capital costs (1988 $ million) | 151.2 | 383.0 | 1754.0 | 955.5 |
| 13. Annualized capital costs | 5.5 | 17.4 | 41.4 | 165.1 | 105.8 |
| 14. Annualized operating and maintenance costs | 64.5 | 80.9 | 110.8 | 103.0 | 100.2 |
| 15. Annualized total costs | 70.0 | 95.3 | 152.2 | 264.1 | 206.0 |

### Cost Effectiveness Index - Cost per new rider per ride (See below)

<table>
<thead>
<tr>
<th></th>
<th></th>
<th>$4.10</th>
<th>$6.83</th>
<th>$6.06</th>
</tr>
</thead>
<tbody>
<tr>
<td>17. Average cost per ride, over-all</td>
<td></td>
<td>1.63</td>
<td>2.13</td>
<td>3.13</td>
</tr>
</tbody>
</table>

Sources and Explanations:

1. 2005 projection from Oahu General Plan.
3. 1989 from Department of Transportation; 1986 from AA-DEIS, p. 4-12; 2005 from AA-DEIS, p. S-31, average of six full rail and three short alternatives.
5. Line 3 minus line 4.
6. From line 3.
10. Oahu Metropolitan Planning Organization, Hali 2000. Rail figure is average with light rail (40.85 min.) and heavy rail (39.45).
12. Through 15. AA-DEIS, p. 6-20. All costs in 1988 dollars except "present" are as shown in annual DTS reports for 1989.
13. AA-DEIS, p. S-31 for rail compared to TSB-bus. TSB-bus CEF calculated compared to no-build, using same method.

League of Women Voters, prepared for 5/18/90 meeting by Astrid Manning, Chair, P & P
May 7, 1990

Mr. Amar Snappal, Project Manager
Department of Transportation Services, RTDD
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawai‘i 96813

PUBLIC HEARING STATEMENT: ENVIRONMENTAL IMPACT STATEMENT
AA/DEIS FOR THE HONOLULU RAPID TRANSIT DEVELOPMENT PROJECT

Gentlemen:

General Comments

The Outdoor Circle as an organization has not taken a position for or against the proposed project. We are concerned, however, with its visual impact - with the preservation of parks, open space, trees and vistas.

We consider the preservation of Honolulu’s unique views, and many trees of utmost importance. It is the natural beauty of Honolulu that lures our visitors. Our vistas from the mountains to the sea distinguish us from many other tropical destinations and are the essence of Hawaii.

Page cc S-32 states:

"All fixed guideway alternatives would have adverse visual impacts due to the presence of aerial structures. They would require removal or trimming of landscaping on Dillingham Boulevard, Kalakaua Avenue and Kapiolani Boulevard, and would change views of the Kuhio Theater and the Kalakaua Avenue Bridge."

We, therefore, believe that the alignment and design of any fixed guideway is crucial.
Specific Comments

1. Aerial in median, dual guideway, Salt Lake Boulevard vs. Kamehameha Highway. The preservation of residential neighborhoods mandates serious consideration, which we believe can best be answered by those living in the area.

2. Aerial in the median along Dillingham Boulevard. The Design must preserve the magnificent avenue planting of True Kamani trees on both sides of the street.

3. Of the three alternatives through town, we support the "Hotel Street mined tunnel with the portal past Kapiolani Boulevard near Cooke Street" as the only solution. This has been the discussed and preferred alignment for any rapid transit through downtown for a number of years. The Indian Banyan on Iolani Palace grounds is on the Exceptional Tree list and should be carefully protected.

4. Kapiolani Boulevard and Kalakaua Avenue intersection. Stacked or double decked with a station on the old Aloha Motors site to continue along Kapiolani median to University Avenue in median to Hetcalf Street.

We believe this segment, particularly the "stacked" section, will not only be a visual intrusion, but an esthetic disaster. Is there no alternative?

The proposed convention center will remove many monkeypods. Any plans to transplant the trees within the site will conflict with the proposed transit station. We recommend that all trees scheduled for removal be incorporated in the design.

The section within the median of Kapiolani Boulevard to University Avenue would necessitate the removal of all the monkeypod trees from McCully Street to University Avenue. These are the only street trees in an area that will continue to increase in density.

5. Waikiki Spur - across the Ala Wai Bridge along the mauka side of Kalakaua Avenue, aerial, either dual or single to Ala Moana Boulevard. This is a very narrow corridor with existing constraints. The sketch in the report shows the mahogany trees in the median remaining. These trees are part of a 1912 Outdoor Circle planting.
Contrary to the stated assumption that in Waikiki, "a major mass transit system would be the cornerstone from which all other improvements can build upon", the Kuhio corridor is already home to many apartment dwellers.

6. No note the Kapahulu Station ends at Kapahulu Avenue. We would strongly oppose the taking of any part of Kapiolani Park for a transit station.

Conclusion

The Outdoor Circle recognizes that recent decisions regarding development in Honolulu will lead to an ever worsening crisis in transportation. More buildings at ever greater heights in Waikiki, Kakaako, and downtown will result in increasing numbers of people needing to get in and out and around, the city.

The development of rapid transit for Honolulu is a major project, one that will affect each and everyone of us in some way for years to come. It is also controversial. Within our own organization there is no real consensus regarding its need.

Thank you for this opportunity to express our concern and views.
May 21, 1990

Mr. Amar Sappal, Project Manager
Rapid Transit Development Division
Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, Hawaii  96813

Subject: Alternatives Analysis and Draft Environmental Impact Statement (AA/DEIS)
Honolulu Rapid Transit Development Project

Dear Mr. Sappal:

Thank you for the opportunity to comment on the AA/DEIS for the Honolulu Rapid Transit Development Project.

The Queen Emma Foundation supports the need for transportation improvements along the study corridor. We have the following observations and questions based on the assumption that one of the fixed guideway alternatives is to be selected for further study:

1. Why were no alternative alignments for the Waikiki Branch considered in the AA/DEIS?

For example, was a subway alignment, as is being proposed as an alternative in the Downtown area, considered for Kuhio Avenue or Ala Wai Boulevard? Wouldn't an elevated fixed rail along Kuhio Avenue have adverse sound and visual effects on the area?

The Foundation, which owns several acres of land on both sides of Kuhio Avenue, has met with considerable enthusiasm for its proposed master plan approach to all of Waikiki. If an elevated rail along Kuhio Avenue is not compatible with the concept of creating more open space and mauka-makai view channels, it should be restudied. We should exhaust the possibilities of constructing underground before an overhead system is considered. If the cost of a subway is prohibitive, perhaps alternative transportation systems to serve Waikiki should be explored, e.g., tram, trolley or an expanded bus system to tie into the transit station at the Aloha Motors site.
2. **Why is the choice of the fixed guideway technology being deferred?**

The AA/DEIS is not intended to lead to a final choice of the type of fixed guideway system. Should the choice of the technology be divorced from the decision of selecting one of the fixed guideway alignment alternatives? Differences in noise and visual impacts exist between the various technologies such that an alignment which may be acceptable using one system, may not be visually or acoustically acceptable with another system. Accordingly, both alignment and technology seem to be interrelated and perhaps need to be considered together.

3. **How will the construction of a fixed guideway system affect the level of the bus transit service within Waikiki?**

All of the proposed fixed guideway alignment alternatives have a common Waikiki branch alignment along Kuhio Avenue in which four transit stations are specified. It is expected that the level of bus service for Waikiki will be significantly reduced by the use of rapid transit. However, shouldn't the resulting bus system coupled with the fixed guideway system provide equal or better service than is currently available? In other words, while bus service in and out of Waikiki may be reduced due to the rapid transit system, the overall level of public transit service within Waikiki should not be compromised.

Thank you again for giving us this opportunity to comment on the AA/DEIS for the rapid transit project. We hope our comments will be given serious consideration during evaluation of the public's comments on the project.

Sincerely,

Gary S. Furuta
Vice President
Testimony of SMALL BUSINESS HAWAII, before the Public Hearing by the Department of Transportation Services of the City and County of Honolulu, Regarding the Alternatives Analysis/Draft Environmental Impact Statement (AA/DEIS) for the Honolulu Rapid Transit Development Project, Tuesday, May 8, 1990, State Capitol Auditorium, Honolulu (7:00 p.m.)

RE: FIXED RAIL MASS TRANSIT FOR HONOLULU

Thank you for the opportunity to give brief testimony this evening.

My name is Sam Slom, and I appear as a small business owner, resident taxpayer, and president/executive director of Small Business Hawaii, a private, independent, statewide association of more than 3,000 small businesses, founded in 1976.

SMALL BUSINESS HAWAIIupports ALTERNATIVES TO THE TRAFFIC CONGESTION. CONGESTION AND COST, CREATED BY GOVERNMENT IN HAWAII TODAY.

However, SMALL BUSINESS HAWAII opposes ANY GOVERNMENT-OPERATED, TAXPAYER-SUBSIDIZED, LIMITED-USE, FIXED-RAIL TRANSIT, AS PROPOSED HERE.

My remarks are necessarily brief, but SBH and its Transportation Committee, have prepared a great deal of detailed analytical data related to government subsidized fixed rail transit, and we would be most happy to share this information as requested.

We have just come through a State Legislative Session that was marked by, and manipulated by, backers of government fixed-rail mass transit. The issue to tax our overburdened taxpayers still further, for the benefit of a few, became the focus of nearly four months of legislative deliberations. In the end, the taxpayers were given yet another increase to look forward to—in 1993. But they weren't given honest answer or the full story on cost of this proposal by high government officials.

Support for this fixed rail scheme is based on faulty financial and ridership estimates, underestimated construction, operation and maintenance costs, and total ignorance of what has transpired in each and every Mainland community that has been burdened by this earthly example of a financial "Black Hole." Comparative data are readily available and acknowledged, yet, supporters push to rush our taxpayers into financial slavery so that a few may benefit. If we didn't have a genuine traffic and transportation problem, and a desperate need for solution, this scheme would not have even gotten this far. Unfortunately, those that seek a solution to real problems of congestion, and neighborhood service at an affordable cost, have been misled by the proponents of this fixed rail Trojan Transit. It does not go where most think—or hope it will go—it will not go "rapidly," or ease congestion, and it will not be used by the very people who need a solution the most because of its limited routing. Along the way, the costs and the dependence on taxpayers here will increase greatly, as elsewhere.

Property values along the final chosen route WILL rise; as will the assessments and taxes due by adjacent property owners or renters, both commercial and residential. Disruptions, during construction, have not been honestly discussed but we have several major State and County projects in the not-so-distant past to compare. Relocation of businesses—mostly small businesses—has been shrugged off, but it is important to those businesses that will be displaced. The time frame is almost ignored completely. Environmentally, the alternatives in this plan add only to alternative visual pollution. Most residents have never seen the planned structures for this project, though the backers, and media, talk in glowing terms of, "flowing, graceful concrete pillars." We have been given a dose of DisneyWorld when we should get a dose of fiscal reality; the only workable alternative is a PRIVATE, SYSTEM, or SYSTEMS of "para transit" options brought about by DECONTROL of transportation, designed to meet the needs of INDIVIDUALS within our community. The current plan fails to provide this option.
Department of Transportation Services
Rapid Transit Development Division
NCR Building
720 Kapilani Blvd., 3rd Floor
Honolulu, Hawaii 96813

Ladies and Gentlemen:

We have had an opportunity to review the Alternatives Analysis and Draft Environmental Impact Statement (AA/DEIS) for the Honolulu Rapid Transit Development Project for Honolulu.

Our comments are limited to that area for which we have some degree of expertise, the area of financial analysis for funding the project. Although we are aware that there have been subsequent refinements to the various financing alternatives contained in the AA/DEIS, we will first address the alternatives contained in the document and discuss those subsequent alternatives and actions taken since the document was submitted to the Urban Mass Transit Administration (UMTA).

We note that the AA/DEIS relies almost solely on the imposition of an additional excise tax rate to generate the local share of the project. Further, the two scenarios given for the general excise rate would either impose a full 1% rate increase for six years or a 0.5% rate in perpetuity. As recently demonstrated by this year’s legislature, a perpetual tax is highly unlikely let alone a temporary imposition as was considered by this year’s legislature.

In addition to federal funds available under either UMTA Section 9 capital funds or Section 3 grants, the only other sources cited is city general funds, i.e., real property taxes and bond proceeds. On the latter point, there appears to be discrepancies between the various tables outlining the capital costs and the potential additional sources of revenues given the funding variations for federal assistance and the amount and duration of the additional general excise tax levy. Further, it is not clear where the cost of debt service is as it is not shown as an element of operating costs as would be the case in most financial statements.

Although the sales tax is commonly used in other cities where mass transit systems have been undertaken, we do not believe that there is adequate justification for relying solely on an additional rate on Hawaii’s general excise tax. We believe that there are other alternatives which have not been discussed in the AA/DEIS which need to be examined, including private participation, value capture, and tax increment financing.
We acknowledge that many of these sources are cited in passing, but no detailed analysis of these sources is presented either for capital costs or for operating costs. Although the AA/DEIS is focused on the capital costs of the project, there should be similar concern about the operating costs and how they will be funded. It is interesting to note that neither the AA/DEIS nor any subsequent presentation by the DTS staff was able to give an accurate picture of how the operating costs were to be covered.

While a list of sources was presented by the DTS staff in recent public presentations, there is some confusion as to how much each source was expected to contribute. For example, the AA/DEIS cites the county general fund as an additional potential revenue source for operating costs, yet in subsequent oral presentations, DTS staff represented that the fuel and motor vehicle weight tax would be tapped to cover operating costs of the system. As these sources are currently dedicated to the county highway program, they are receipts of the county’s highway special fund and not the general fund.

Further, when queried about any increase in the rates of these two taxes, the response was that no rate increase was anticipated. It seems hardly plausible that the current revenues from these two sources could continue to fund the current level of services provided by DTS as well as subsidize the operating costs of the system.

We believe that before capital construction begins, a sincere proposal be put forth as to how the operating costs of the system are to be covered. According to the AA/DEIS, the only feasible way the system can be constructed and operated is with a perpetual 0.5% transit tax. On the other hand, county officials have denied that the perpetual tax is the preferred option to generate sufficient operating revenues.

We do not believe it to be fair to ask the taxpayers of this county to build a system which cannot pay for itself or where it has not been demonstrated how the operating expenses will be paid for - by the system or in the form of a tax subsidy.

We also have reservations about the pronounced cash financing of the capital costs with less than one-fourth of the total capital budget being underwritten by debt financing. The use for such a major capital project imposes a much heavier burden on the current generation of taxpayers for the benefit of future taxpayers, creates distortions in the current picture, and utilizes funds which should be used for current operations and programs.

In total, we do not believe adequate attention has been given to the financing alternatives which might be available to help pay for the system nor do we believe that there has been
any creativity in the search for alternatives. What it appears has taken place is to merely borrow from another city what was appropriate for that city and not what might prove to be a unique advantage for the Honolulu project.

We appreciate this opportunity to share our comments on the Alternatives Analysis and Draft Environmental Impact Statement for the Honolulu Rapid Transit Development Project.

Very truly yours,

Lowell L. Kalapa
Director

LLK/jad
TESTIMONY SUPPORTING
HONOLULU RAPID TRANSIT DEVELOPMENT

May 8, 1990
State Capitol Auditorium

Good evening, I am Christina Kemmer, President of the Waikiki Improvement Association. The Waikiki Improvement Association is a private non-profit organization devoted to preserving and improving Waikiki. It is an organization that is 300 members strong and is recognized as an effective voice for improving the quality of life in Waikiki for visitors and residents alike.

In October 1989 the "Waikiki Tomorrow" Conference, supported by the Waikiki Improvement Association and the State of Hawaii brought together for the first time over 400 concerned community leaders to map out what will be necessary to maintain and create an even better Waikiki. These leaders — from business, labor, government and resident organizations represented a broad cross-section of Oahu and State interests. The concept of mass transit emerged as a primary concept which all members could support. In January of 1990 the Waikiki Improvement Association adopted a resolution which promotes the principle of mass transit as a major factor in solving Waikiki's transportation and congestion problems.

The Waikiki Improvement Association supports fixed guideway technology and the routing alternative which connects Waikiki to the Honolulu International Airport and to Pearl Harbor.

Such a system would provide the following positive solutions:

1. Reduce street congestion by encouraging parking outside of Waikiki for commercial and entertainment activities.

2. Increase available land for pedestrian amenities, such as wider sidewalks, additional landscaping and increased space for services.
3. Reduce bulk density by eliminating the need for bulky parking structures for commercial and residential properties. Parking accommodations are typically the lower, bulky part of buildings covering all or most of the lot all the way to the sidewalk at street-level. Reducing cars and parking requirements can thereby reduce the apparent density and allow for more open space where it counts most—at the sidewalk. This was a principle finding and call to action of the "Waikiki Tomorrow" Conference in October, 1989.

4. Decrease the necessity for Waikiki residents to rely on personal automobiles to transact business and participate in community activities.

5. Enhance the visitors' likelihood of increased island-wide participation in the cultural, educational, social, athletic and religious activities of Honolulu.

6. Provide Oahu residents hassle-free access to all entertainment and food and beverage facilities in Waikiki.

7. Reduce the travel time from Waikiki to Downtown by 14 minutes.

8. Reduce auto vehicle trips by 42.6 per cent.

A mass transit system with proper feeder elements could significantly integrate all the resources of Oahu with Waikiki and vice versa. It would give a tremendous boost to the quality of life in Waikiki and Honolulu. Waikiki is not only an important economic contributor to the State. It is an important social contributor to the quality of life for all in Hawaii. It would be the cornerstone from which all other improvements can be built upon.

Thank you for allowing me to testify on this important project.

Attached for your reference is a copy of the W.I.A. Vision Paper written by Donald Y.W. Goo, FAIA; Chief Executive Officer, Wimberly Allison Tong and Goo.
WAIKIKI -- WHAT NEXT?
By: Donald W.Y. Goo, FAIA

'What Next?' implies that there is a present--a now. It implies a vision--a future. Waikiki is the state's golden egg.

To manage Waikiki, we should 1) understand its strength and its weakness; 2) have a vision that creates Waikiki as a special place; 3) identify key solutions that will spark many complementary activities; 4) develop an economic strategy; and 5) because of Waikiki's importance to all residents, involve everyone in the community to embrace the strategy.

ASSESSMENT

Waikiki's greatest assets are the concentration of these features:

1. Restaurants
2. Entertainment
3. Hotel Rooms
4. Meeting Spaces
5. Good weather that allows everyone to enjoy outdoor recreational and educational activities, as well as walking around.
6. A multi-cultural community.

The concentration is enhanced by the laid-back attitude of the people of Hawaii, which is reflected in the Aloha Spirit that continues to shine.

What are Waikiki's major problems? Its major problems are focused on crowding--the concentration of too many cars on the streets, too many cars and trucks illegally parked, too many people on narrow sidewalks, too much building, too many signs, not enough parking spaces, not enough landscaping, not enough lighting for security, and not enough open space.

The major solution to Waikiki's problems should focus on solving the automobile and the open space problem.

VISION

It can be a distinctive world-wide visitor destination that features a year-round climate for walking around to see a blending of Pacific cultures and to enjoy indoor/outdoor activities.

Waikiki is an urban resort and should be integrated with its surroundings, enhanced and improved. Waikiki cannot be Polpu, Kauai with its lower density, low-rise buildings, etc. The major focus for Waikiki's tourism future should be in attracting conventions and tour groups that will learn about their business, meet their colleagues, and learn about Hawaii's multi-

Wimberly Allison Town & Goo
Engineers and Planners
racial culture. Our residents of Waikiki will choose this community because of these attributes.

The promotion of Waikiki should clearly emphasize its assets. Future public improvements and developments should be complimentary to these efforts. These improvements and developments should be encouraged so that in ten years (the year 2000) Waikiki will be what we are discussing today. That's what a developer of Waikiki would do. That's what the Waikiki Improvement Association should do. That's what the City and County of Honolulu should do.

Solutions

Two concepts emerged from the Waikiki Tomorrow Conference on which all the others could support — mass transit and a special management group for maintenance. These two concepts would have a significant, favorable impact on the future development and total lifestyle of Waikiki. They would affect the existing and future physical environment (including development), the social and cultural environments, and economic growth of the area. They have in common their potential influence on other proposed solutions, both short- and long-term. Implemented, the effects of mass transit and special management of Waikiki would be phenomenal. If they are not implemented, many other possible solutions will be impossible to achieve or considerably compromised.

The first concept — mass transit and its feeder elements — recognizes the profound influence of transportation on the economy, on the physical environment, and on the way people work, play and feel.

Convenient transportation into, out of, and within Waikiki would do much to change Waikiki, in the eyes of residents, from a place to avoid, to a place to enjoy. The easier and more pleasant the "getting around" experience, the more visitors will explore and utilize facilities and attractions. Probably three-quarters of the proposed solutions to problems of Waikiki's physical plant and many proposed solutions for improvements for social and cultural elements, as well as the economic development of Waikiki, are tied to an efficient transportation system for Waikiki and beyond. Such a system would provide the following solutions:

1. Reduce street congestion by encouraging parking outside of Waikiki for commercial and entertainment activities.

2. Increase available land for pedestrian amenities, such as wider sidewalks, additional landscaping and increased space for services.

3. Provide Oahu residents hassle-free access to all entertainment and food & beverage facilities in Waikiki.
4. Enhance the visitor's likelihood of increased island-wide participation in the cultural, educational, social, athletic, and religious activities of Honolulu.

5. Decrease the necessity for Waikiki residents to rely on personal automobiles to transact business and participate in community activities.

6. Eliminate the need for parking for commercial activities and reduce the number of parking stalls required for residential properties— which would eliminate or minimize the building bulk for parking and, by minimizing parking requirements, decrease the cost of development.

7. Increase open space and views towards mountains and ocean, lessen the feeling of congestion, and provide more light and more room for landscaping.

A mass transit system with its proper feeder elements could significantly integrate the entire resources of Oahu with Waikiki and vice versa. It would, in effect, give a tremendous boost to the quality of life in Waikiki and Honolulu.

Other proposals—such as controlling building height, improving signage, enlarging beaches, and so on—would indeed enhance the development of Waikiki. A major mass transit system, however, would be the cornerstone from which all other improvements can build upon.

The second concept recognizes the necessity of a continuum of appropriate action in order to sustain the benefits of capital and other improvements. Structured on a special management of physical, social, and cultural aspects of the environment by an organization specifically selected and dedicated to this effort and minus the normal bureaucratic city administration.

This concept entails creation of a public/private development/maintenance group that could continuously enhance the day-to-day experience of life in Waikiki. This authority should include personnel who currently have responsibility for Waikiki. It would foster a safe, clean and good looking Waikiki; keep it smoothly operating 24 hours a day; and cater to the concerns of both visitors and residents. Waikiki is the center piece of Hawaii's visitor industry and also the home of several thousand residents. The area requires a unique and specialized management effort to provide services sensitive and responsive to both the visitor and the resident.
These concepts would work synergistically towards the building and perpetuation of a truly people-pleasing place that would perform splendidly as a visitor destination area and as a place to live. The many facets of Waikiki could function with distinction, pleasing those who spend time there and setting an outstanding example to the world.

**Economic Strategy**

The funding of solutions is usually the major stumbling block in all good suggestions. "Who is going to pay for the good ideas?" is followed by, "How much will it cost? You can have it if it doesn't cost anything." One solution would be for the improvements to be paid by public money; that is, through our taxes. If it's taxes, does it come from existing tax revenues? Can we earmark a portion of the hotel room tax? How much of it can be used? Everyone is looking to the surplus state revenues to fund other state or community programs and expenses. Will the state turn over some of these funds to the county for improvements? Will the state joint-venture new Waikiki improvements similar to the recently completed Kukakua Avenue Improvement project?

A pragmatic, wouldn't rely on current tax income for the proposed improvements despite the fact that this source of money would have the least amount of impact on all residents and visitors. It may be difficult and/or time consuming and the results unpredictable.

The alternative would be to increase tax revenues by increased development opportunities or by a combination of public/private sponsorship of the improvements. In either case, incentives to contribute funds for improvements would come from changes in density for developed properties; reduced parking requirements; tax credit investment; and building height.

The incentives should increase 1) land value; 2) real property taxes; 3) new development; 4) redevelopment; 5) increase open space/landscaping; 6) increase demand for mass transit; 7) increase income taxes; and 8) increase the feasibility of development. The resultant increase in taxes, which would be over and above the normal increases in tax revenue through inflation, would be insufficient to pay for the proposed Waikiki improvements.

Implementations of services and special maintenance of Waikiki should be by a partnership between government and private enterprise. A major percentage of the funds for this should be from government and a major percentage from Waikiki owners by an assessment of a percentage of their property value. This assessment would be only to commercial properties, not residential properties.
The development of a transit system that services Waikiki should be at the
cost of the general public because of the common value that it accrues to
the entire country and state. Revenues for this development would come from
increased growth in tourism.

ENVIRONMENTAL IMPACT

The general environmental impact of an increase in Waikiki's visitor
industry will be more visitors in a place that can accommodate them.
Waikiki's visitors will have more area of sidewalk/visitor, more open space
and landscaping/visitor, better accessibility to and from Waikiki for
visitors, residents and employees. It will be better maintained and will
look more attractive.

A higher density should be permitted on existing fully developed property in
exchange for more open space and landscaping at ground level. Properties on
the beachfront which are fully developed should be encouraged to redevelop
with more open space, landscaping and higher building heights. Examples of
the increased open space are the Liliuokalani Garden Apartments, Royal
Hawaiian Shopping Center and Hilton Hawaiian Village. Development without
parking requirements would not add to auto traffic or building bulk and
would create more landscaping and increase financial feasibility by
eliminating the development cost of parking.

A better physical environment including cultural activities will enhance
everyone's feelings. A smile on everyone's face must be an environmental
plus.

Community Involvement

Waikiki belongs to everyone. What is good for the tourist is good for us
and what is good for us is good for the tourist. We are one. The vision of
Waikiki must be a place for all of us to enjoy. It should not be a zone for
visitors. It must not overwhelm us. There must be a balance of our
involvement to redirect Waikiki to be a better place. To improve Waikiki,
we must involve everyone because Waikiki affects everyone.

15 December 1989
6.0 BUSINESSES
May 23, 1990

Department of Transportation Services
City & County of Honolulu
c/o Mr. Amar Sapal, Project Manager
Rapid Transit Development Division
650 King Street, Third Floor
Honolulu Hawaii 96813

Re: March 1990 Alternatives Analysis-Draft Environmental Statement Honolulu Rapid Transit Development Project

Gentlemen:
We are unable to support any of the Alternatives considered in the AA-DEIS. The Fixed Guideway Alternatives all assume displacement of Urban Trunk Routes, jeopardizing the core of Honolulu's transit ridership. Forget about substitution "Lines" because in-town people are not going to wait for a bus 13-32 minutes when they're used to 4-minute headways. Given our typical morning showers, and the heat, humidity and rains of our tropical climate, they will drive instead. Furthermore, the basic Alignment appears to be environmentally unacceptable, leading to deviations and added costs to mitigate. Thus, a transit system with low ridership and high costs spell unmanageable problems for our community.

We address the AA-DEIS in a questionnaire format:

- Is there enough information in the AA-DEIS to make an informed business decision on which Alternative should serve as Honolulu's future public transportation system?
- Are the various available alternatives fairly compared in the AA-DEIS?
- How viable are the Ridership Projections?
- How will Route Changes affect Ridership?
- How will Feeder Bus Transfers affect Ridership?
- Are Cost Projections realistic?
- What is Alternative Thirteen?

Is there enough information in the AA-DEIS to make an informed business decision on which Alternative should serve as Honolulu's future public transportation system?

The AA-DEIS is a technical engineering report, tailored to UMTA's specifications, to develop and operate a fixed guideway system. It assumes dismal prospects to move
people out of private cars into public transit, and lacks a comprehensive transit-paratransit perspective. A 15-mile Fixed Guideway with 174 cabs stopping at 27 stations is nothing more than a train on a milk run—defeating the intended purpose: SPEED.

It is not a Business Plan upon which to base a financial decision. There is no description of market conditions—no marketing plan—no explanation of how the public transit system will be managed. It fails to present various available financing alternatives.

Cost comparisons between the various alternatives are implausible. The 475-bus fleet of Alternatives 1, and Alternatives 3 to 11 is under-stated. The 997-bus fleet for Alternative Two is over-stated. Potential savings from using private carriers to supplement TheBUS fleet were excluded from consideration, so that the cost of Alternative Two is inflated.

Alternative Three approximates the route of Urban Trunk Route No. 20, having the least riders of all the Urban Trunk Routes. On the other hand, Alternative Ten approximates the route of Urban Trunk Route No. 2, having the highest productivity of all the Urban Trunk Routes. Route Two targets residential and commercial densities. For an extra $477 Million in capital costs, Alternative Three is projected to achieve a 3% higher ridership over Alternative Ten.

Incidentally, how is a Puuhale Station going to handle 50,200 bus rider traffic in Alternative Ten and Eleven, road traffic-wise?

From now until the opening of the train, State highway improvement constitute interim solutions. All of the Alternatives focus on capital-intensive Engineering projects, rather than a customer-oriented Marketing Approach.

The AA-DEIS ignores a key measure in the HALI 2000 Study: to double All-Day parking charges to discourage private car use. Instead, the City and State continue to promote private car usage by subsidizing employee parking at $30-$35 a month, costing a fraction of the $100-$200 monthly rate charged by private parking garages.

Are the various available alternatives fairly compared in the AA-DEIS?

Although the City obtained conceptual proposals from Fixed Guideway developers, no in-put or solicitation was invited on TSM alternatives—contrary to UMTA policy of private carrier participation in public transit projects. Thus, innovative and cost-effective paratransit options have been excluded from consideration in Alternative Two.

Alternative Two offers the ability to control O&M costs or cut further losses simply by selling buses, or terminating paratransit contracts. On the other hand, the type of technology and O&M costs of Alternatives Three through Eleven are perpetual.

Bus routes in Alternative Two have not been explained or mapped out in the AA-DEIS to show how it intends to expand service to the neighborhoods, island-wide. A transit-paratransit fleet could provide far superior service island-wide almost immediately—and
substantially boost ridership—over any of the proposed Fixed Guideway Alternatives, depending how the system is managed.

Choosing Alternative Three as the "Preferred Alternative" because of "least environmental impact" (giving up ridership from densely populated Salt Lake) and "less maintenance cost" (undertaking tremendous cost to tunnel underground Downtown) discredits all fixed guideway’s Alternatives. These arguments also raise a question about the political viability of running an overhead fixed guideway through Waikiki. Thus, with Alternative Three, the prospect of tunnelling underground for the Waikiki segment would lead to added costs and engineering (water-table) problems.

Alternative Three targets primary tourist destinations: Zoo-Waikiki Shell, Int’l Marketplace Proposed Convention Center, Aloha Motors Proposed Convention Center, Ala Moana Shopping Center, Neal Blaisdell Center, State Capitol Complex, Chinatown & Aloha Tower Complex, (possibly including Dole Cannery), Honolulu International Airport, Arizona Memorial, Aloha Stadium, and By Express Bus: Ko Olina and Makaha.

Obviously, a benefit of this route is to capture tourist traffic during the off-peak periods of the transit system. On the other hand, Alternative Three lops off a huge chunk of business away from passenger carriers and car rental companies serving tourists.

**How viable are the Ridership Projections?**

The ridership projections of the No Build Alternative in the AA/DEIS shows a 2.6% increase in transit ridership by FY 2005, over FY1986 base ridership of 185,000. The formula basically assumes:

"More population + more jobs = higher transit ridership."

However, the validity of this formula is unsubstantiated by TheBUS performance for the past decade, showing a decline in transit ridership of 0.3% per year from 1985 to 1989, while Population and Employment increased by 7.4%, and the City’s bus fleet increased by 15%. Recent history shows:

"More population + more jobs + more buses + newer buses + more routes + cheap busfares + highest fuel cost in the nation + higher parking fees = declining TheBUS ridership + higher government subsidy + more private car traffic = more road congestion."

But, if ridership projections in the AA-DEIS were to materialize, what is the City’s justification for not planning to increase the bus fleet to 600 vehicles, as the HALI 2000 Study contemplated? The City has yet "to expand the fleet to 500 coaches by FY 1987," as planned. (See p. 4-7 of HALI 2000 Study.)
*How will Route Changes affect Ridership?*

Ridership defections on account of removing major trunk routes is a crucial risk to consider in comparing between Alternatives. Commuters may be unable or unwilling to adjust to changes of a long-established system.

It appears that all of the existing Urban Collector Routes are being eliminated or drastically changed in route and schedule. Today's routes and peak hour headways (in minutes) are:

<table>
<thead>
<tr>
<th>Route</th>
<th>Destination</th>
<th>Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Route 1</td>
<td>Kaimuki - Kalihi</td>
<td>4-mins</td>
</tr>
<tr>
<td>Route 2</td>
<td>Waikiki - Lil`ha</td>
<td>3-mins</td>
</tr>
<tr>
<td>Route 3</td>
<td>Kaimuki - Pearl Harbor</td>
<td>7-mins</td>
</tr>
<tr>
<td>Route 4</td>
<td>Nuu`anu - Punahou</td>
<td>8-mins</td>
</tr>
<tr>
<td>Route 8</td>
<td>AMC - Waikiki</td>
<td>6-mins</td>
</tr>
<tr>
<td>Route 9</td>
<td>Palolo Valley</td>
<td>12-mins</td>
</tr>
<tr>
<td>Route 12</td>
<td>Salt Lake</td>
<td>10-mins</td>
</tr>
<tr>
<td>Route 19</td>
<td>Hickam - Waikiki</td>
<td>12-mins</td>
</tr>
<tr>
<td>Route 20</td>
<td>Waikiki - Pearlridge</td>
<td>15-mins</td>
</tr>
</tbody>
</table>

These routes are to be replaced by "Lines" that approximate some of those current nine Urban Collector Routes, such as:

<table>
<thead>
<tr>
<th>Line 1A</th>
<th>Hawaii Kai - Kahala Mall - Kaimuki - Isenberg - Kalakaua - Kapiolani - Ala Moana</th>
<th>32-mins</th>
</tr>
</thead>
<tbody>
<tr>
<td>Line 23A</td>
<td>Kaimuki - University/King - Thomas Sq - CBD - Kalihi/King</td>
<td>13-20 mins</td>
</tr>
<tr>
<td>Line 20</td>
<td>Waikiki - Kalakaua/Kapiolani - Thomas Sq - CBD - School/Middle</td>
<td>18-55 mins</td>
</tr>
<tr>
<td>Line 23</td>
<td>Palolo - Univ/King - Thomas Sq - CBD - Kalihi/King - Salt Lake - (Aloha Stadium)</td>
<td>47-52 min</td>
</tr>
<tr>
<td>Line 24</td>
<td>Moanalua Valley - Mapunapuna - (Lagoon)</td>
<td>12-18 mins</td>
</tr>
</tbody>
</table>

Preference to certain districts (in peak-headways) on Express Bus routes are indicated:

<table>
<thead>
<tr>
<th>Route 11B</th>
<th>Makaha-Ko Olina-Waialua -- Express</th>
<th>3 minutes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Line 6AX</td>
<td>Ko Olina-Waialua -- Express</td>
<td>5 minutes</td>
</tr>
<tr>
<td>Line 6B</td>
<td>Ewa Beach-Waialua -- Express</td>
<td>5 minutes</td>
</tr>
<tr>
<td>Line 2B</td>
<td>Hawaii Kai-Isenberg-Kalakaua/ Kapiolani-Ala Moana -- Express</td>
<td>8-9 minutes</td>
</tr>
<tr>
<td>Line 20B</td>
<td>Millilani Mauka-Waialua -- Express</td>
<td>8 minutes</td>
</tr>
<tr>
<td>Line 85X*</td>
<td>Kailua-Aikahi-Kaneohe-UH -- Express</td>
<td>44 minutes</td>
</tr>
</tbody>
</table>
Line 85AX*, Kailua-Aikahi-Kaneohe-CBD -- Express, 61 minutes
Line 23B, Wahiawa-Waialua -- Express 9-11 min.
(Source Tables attached, with complete listing of existing and proposed new routes.)

How many households will be impacted by removing established trunk routes, in order to provide feeder buses to the Fixed Guideway? As pointed out on page 2-15 of the HALI 2000 Study, "ninety-five percent of the population in urbanized areas of Oahu reside within a quarter-mile walking distance of the system."

**How will Feeder Bus Transfers affect Ridership?**

Ridership defections due to transfers is another crucial factor to weigh in comparing between Alternatives.

How the feeder bus system works with the fixed guideway system is mysterious. The AA-DEIS shows no maps or detailed routes descriptions. Headways of the feeder buses are not sufficiently explained to show access and convenience to users.

Removing the Urban Trunk Routes running East-to-West, and replacing them with a feeder bus system running Mauka-to-Makai to the Fixed Guideway, requires a major redesign of the bus system. Since existing TheBUS routes are not grid-patterned, switching to a grid-system will involve frustrating growing pains.

More buses may be required for the feeder buses running mauka-makai in order to provide short headways---substantially increasing costs. Designing a feeder bus system is directly affected by (a) one-way street patterns, and (b) traffic lights that favor traffic running east-west--both having the possible effect of slowing bus travel speeds. Instead, Taxis and Paratransit feeder shuttles would enhance the rail system more efficiently than big buses, as *smaller loads deliver faster service.*

Alternatives Three through Eleven rely heavily upon feeder buses to provide one or more transfers per trip. Yet, the percentage of existing (surveyed) transfers per transit trips is 81.6%. Alternative Three is projected to have a 44.4% rate of transfer trips, Alternative Ten projects 43.7%, compared to 31.8% for Alternatives One and 33.4% for Alternative Two. (Source: AA-DEIS, p. 4-5.)

"Re-training" riders to use the public transit system is fraught with potential of errors and frustrations, thereby running a risk of further depressing transit ridership.

**Are Cost Projections realistic?**

Without a better definition of how Alternative Two would serve island-wide needs, and without knowing how the feeder buses will work in concert with the Fixed guideway system, and without realistic bus fleet requirements of all the Alternatives, capital and O&M
cost projections are tentative.

Is subsidization of tourists’ rides avoidable?
Yes. According to the 1986 On Board Rider Survey, the breakdown of Riders by Fare Type are: Cash 32.6%, Monthly Bus Pass 51.7%, Senior Bus Pass 13.3%, Handicapped Bus Pass 2.4%.

Quoting directly from the AA-DEIS: “given the very low base fare level, a large percentage increase in fares would result in only small decreases in ridership, but substantial increase in revenue.

“The 60-cent base fare is among the lowest in medium-sized cities in the United States. The effective average are is made lower still by the absence of any surcharges for distance traveled or premium (express) services. The widespread use of heavily discounted monthly passes makes TheBus one of the best bargains in the transit industry.”


What is Alternative Thirteen?
Using information gathered in this Public Review Process of the AA-DEIS, let us implement a Transportation Master Plan having a comprehensive "people-moving" approach to improve service, expand options—to discourage private-car commuting. Transit-paratransit and taxis have unlimited potential to increase ridership, by using multi-modes, multi-carriers and diverse techniques to expand consumer options, upgrade quality and curtail costs. For starters, here are some suggestions:

- Establish Transportation Master Plan
- Create a Transit-Paratransit-Taxi Authority
- Retain the Urban Trunk Routes, as a solid base to build upon.
- Add routes running mauka-makai: From Kīnau to Ala Moana: on Punchbowl, Ward, Keeauumoku, From UH to Kapiolani: on University.
- Double Express Bus fleet (using private contractors)
- Route Express Buses to specific destinations such as Bishop, Punchbowl, Ala Moana, Waikiki, U.H.
- Implement other paratransit services, such as Shuttles from condominiums to work. Shuttles from neighborhoods to Express buses. Shuttles between downtown and shopping hubs Shuttles for Waikiki hotel workers and residents of Kapahulu --- from Kapiolani - Date - Kapahulu - Kuhio - Kalakaua/ Kapiolani --- running clockwise
against traffic.

- Parking: Dedicate government office parking garages to carpool and vanpool parking, open to public, and provide frequent shuttle between garages and workplaces.
- Parking Tax: Tax parking fees to discourage private car usage.
- Raise fares: full fare $1.00. Stop use of discounted Senior Bus Pass during peak hours.
- Develop an overhead Fixed Guideway on H-1 freeway, from Waiawa to Kahala Mall. Target Express feeder shuttles from H-1West, H-2, H-3, and H-1 East ---attracting ridership from Makaha-Ewa, from Wahiawa-Millani, from Kaneohe-Kailua, and from Waialae to Hawaii-Kai.
- Provide frequent shuttle loops and Express Buses as feeders, from the freeway stations to key employment-, shopping-, school-, and medical-centers. Thus: by reducing number of stations and stops, speed up trip times.
- Construct bridge from University across Ala Wai Canal to Waikiki.
- Free up taxis from the shackles of senseless, rigid regulations and bureaucratic interference that stifle creative marketing and competition. Let government stop using the contracting process to foster any more transportation monopolies. No more "competitive bids" that disqualify small business from participating, or narrow contestants, or impose unreasonable conditions and arbitrary fleet configurations or other specifications that undermine ability to independently manage and control costs.

We hereby reaffirm our cooperation and interest to participate in comprehensive public transportation programs aimed to better serve Honolulu’s island-wide community, and thus entice people out of private-car commuting. Our MBE/DBE/WBE Certificate is attached.

Sincerely,

[Signature]

Dale Evans
Executive Vice President
CHARLEY'S TAXI RADIO DISPATCH CORPORATION

PLEASE NOTE OUR NEW ADDRESS:  680 Ala Moana Blvd, Suite 303, Honolulu Hawaii 96813-5409.
Phone: (808) 531-2333. Fax: (808) 521-7367.
### Table 3.4
**FREQUENCY OF SERVICE ON LOCAL ROUTES**
(Headways in Minutes)

<table>
<thead>
<tr>
<th>ROUTE NO.</th>
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</tr>
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<td>AMC-Waikiki</td>
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<td>8</td>
<td>Hickam-Waikiki</td>
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<td>9</td>
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<td>7</td>
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### SUBURBAN TRUNK ROUTES

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### SUBURBAN FEEDER ROUTES

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MBE/DBE/WBE CERTIFICATE OF ELIGIBILITY

This is to inform you that your firm of

Charley's Taxi Radio Dispatch Corp.
1682 Kalakaua Avenue, Room 4
Honolulu, Hawaii 96826

has been certified, effective May 9, 1990, as an eligible minority/disadvantaged business enterprise (MBE/DBE) according to the requirements set forth under Sections 23.51, 23.53 and Subpart D of Title 49, CFR Part 23.

Your firm has been certified as follows:

Socially & Economically
Disadvantaged (DBE) X
Minority-owned (MBE) X
Women-owned (WBE) X

Vendor: Manufacturer Supplier

Your firm will be included in our MBE Directory, which will be used as a referral and be made available to all bidders/proposers for consideration in all federally-assisted Department of Transportation projects.

As this certification is valid only for one year from the date of issuance, you are required to update your status annually by submitting a new Schedule A or certifying that the Schedule A on file is still accurate.

A change in ownership and control of your firm at any time shall require a submittal of a new Schedule A for a redetermination of eligibility as an MBE/DBE/WBE.

Thank you again for your interest and cooperation in our program.

BERT K. NISHIMURA
Business Management Officer

Date: May 9, 1990
"It is UMTA's policy to promote coordinated paratransit services in a free market environment that is flexible in responding to public needs and not encumbered by public involvement or subsidy"

Ralph L. Stanley
UMTA Administrator
March 28, 1984
PARATRANSIT POLICY

1. Purpose
To state UMTA's policy concerning the planning, development, and funding of paratransit services as part of local transportation programs.

2. Scope
This policy applies to use of funds available under Sections 3, 5, 6, 8, 16, and 18 of the Urban Mass Transportation Act (UMT Act) of 1964, as amended, and to mass transportation projects funded under Title 23 of the United States Code (U.S.C.).

3. Background
Paratransit, a concept that has been evolving for more than a decade, represents a set of transportation services, ranging from private automobile to conventional bus service. Many of these services, especially those that are shared-ride or collective in nature, are considered mass transportation. Specifically paratransit services such as dial-a-ride, shared-ride taxi, jitney, subscription bus, and various forms of ridesharing, particularly vanpooling, are eligible for financial assistance under the UMT Act. These services can be vital components of a total mass transportation system.

Paratransit response to a number of conditions which affect the provision of traditional public transportation. First, while Federal, State, and local governments are placing strong emphasis on strengthening the existing transportation infrastructure, Federal funds are not as readily available as previously for significant system expansion.

Second, public opinion may place more demands upon a local transit system than it can easily accommodate. Taxpayers expect local mass transportation systems to serve a great variety of urban travel needs at the lowest possible cost, but conventional transit does not offer the most efficient solution to every transportation need, for example: the need for community circulation in inner-city, suburban and rural areas; the need for specialized service for elderly or handicapped citizens; and the need to provide an alternative to the automobile for business commuters, airline passengers, etc. To accommodate the various missions assigned to them, modern mass transportation programs need to incorporate a more diverse set of services than in the past.

Paratransit is one response to providing increased transportation capacity through low-capital alternatives and to extending mass transportation service in situations not appropriate for conventional transit. In addition, paratransit, particularly ridesharing, can serve as a viable alternative to the private automobile, potentially improving existing road network efficiency. Paratransit can also serve, at relatively low cost, the elderly and handicapped, residents of rural and low-density areas, and other citizens requiring customized transportation services. For those who regularly commute by automobile, paratransit can offer a higher quality service than is available through conventional systems. As a result, more people may discontinue use of private automobiles and turn to public transportation as an alternative.

In many communities, paratransit already exists. For example, aged and handicapped persons rely heavily on taxicabs for transportation, while many commuters have turned to carpooling, vanpooling, or subscription buses. This policy, therefore, does not necessarily imply that localities should establish new paratransit services, although UMTA has, on a limited scale, funded such services.
4. Definitions
   a. Paratransit — a family of transportation services, generally provided in small
      vehicles, which are tailored to individual travel needs through flexible scheduling
      or routing of vehicles. Services include carpooling, vanpooling, dial-a-ride, shared-
      ride taxi, jitney, airport limousine, and subscription and route-deviated bus services.
   b. Shared-Ride — Service in which individuals cannot reserve a trip for their
      own private use.
   c. Demand-Responsive — Services which provide doorstep or near-doorstep
      service. Paratransit services include dial-a-ride, shared-ride taxi, and point-to-point
      or route-deviated bus service, as well as many specialized services for elderly and
      handicapped persons, whether provided on-call or on a prearranged basis.
   d. Fixed-Route — Services which operate over a predetermined route. Paratrans-
      sit services include subscription bus, jitney, and airport limousine service.
   e. Ridesharing — Cooperative transportation arrangements which include car-
      van-, and buspooling.
   f. Transportation Brokerage — A market-oriented transportation strategy
      wherein an entity identifies various transportation markets and needs, facilitates
      the development of an efficient market environment, and matches the most appro-
      priate services and providers to individual markets.
   g. User-Side Subsidy — A direct subsidy to transportation users, which allows
      them to select the service and provider they prefer.
   h. Purchase of Service Contract — A contractual relationship wherein an or-
      ganization purchases a transportation carrier's services through negotiated or
      competitive procurement.
   i. Private Transportation Carrier — A transportation provider which does
      not have tax-exempt status under the Internal Revenue Code.

5. Policy
   The strength of our transportation system lies in its diversity, with each mode
   contributing its special advantages and responding to different consumer demands
   at various levels of cost and quality of service. It is the policy of the Urban Mass
   Transportation Administration (UMTA) to preserve and foster this diversity by
   promoting competitive opportunity for different forms of transportation, both pub-
   lic and private, and to encourage coordination and integration of service among the
   various modes.

   Because paratransit readily lends itself to flexible routing and demand respon-
   sive scheduling, it may be uniquely capable of satisfying a wide range of local trans-
   portation needs that would otherwise remain unmet or be provided for less effec-
   tively. In rural America, in small towns, and in suburban communities, paratransit
   is usually the most economical form of transportation. In many communities, large
   and small, paratransit will best meet the travel needs of the elderly, very young,
   physically handicapped, or persons lacking cars or without convenient access to
   line-haul transit.

   Proper coordination of paratransit with conventional transit will increase the
   effectiveness and efficiency of an area's total transportation system. UMTA believes
   that paratransit, in general, can be most responsively provided in a free market
   environment. In many communities, the private sector already stands as a readily
   available and efficient provider of paratransit services. UMTA wishes to preserve
   and enhance this role by encouraging private transportation carriers to develop
   paratransit services wherever possible.

   This policy further encourages localities to foster and make use of the private
   sector's ability to provide unsubsidized paratransit services. If public investment in
   paratransit becomes necessary, UMTA would still encourage public administering
   agencies to contract with private paratransit carriers wherever possible. Federal
   assistance is available to support such arrangements as competitive purchase-of-
service contracts or user-side subsidies. Where a locality determines that operation of paratransit services by a public or non-profit agency best meets local needs, Federal assistance is also available to support the planning and operation of those services.

In addition to other locally-developed techniques, UMTA specifically encourages:
- Fair and timely opportunities for private transportation carriers to competitively participate in the planning and operation of public paratransit services.
- Special efforts to examine and remove regulatory barriers which inhibit private enterprise from providing paratransit services in a competitive environment.
- Consideration of the benefits of permitting new business entrants to provide innovative mass transportation services, including paratransit.
- Creation of an environment conducive to the reentry, reinvigoration, and expansion of private sector involvement in mass transportation.
- Coordination and consolidation of paratransit services to make maximum use of existing transportation providers.
- Matching of individual transportation consumer needs to the most competitive, cost-effective transportation suppliers.

This policy is not intended to be intended to be prescriptive, and therefore, should not be construed as binding upon recipients of Federal mass transportation assistance. Rather, the policy emphasizes a locality's wide discretion in determining whether to establish or continue paratransit service and who should provide this service. UMTA will not substitute its judgment for that of a locality in matters of transportation planning, operation or management. Local decisions, however, must be consistent with the private enterprise provisions set forth in Sections 3(e) and 6(e) of the Urban Mass Transportation Act of 1964.

In summary, it is UMTA's policy to promote diversity and innovation in modern transportation systems, to revitalize private sector participation in mass transportation and to stress the importance of local transportation decisionmaking. Paratransit, UMTA believes, is one transportation mode conducive to these three objectives, and cooperative private-public effort will ensure the best possible overall community transportation at the lowest possible cost. It is therefore UMTA's policy to promote coordinated paratransit services in a free market environment that is flexible in responding to public needs and not encumbered by public involvement or subsidy.
May 24, 1990

Department of Transportation Services
City & County of Honolulu
c/o Mr. Amar Sapal, Project Manager
Rapid Transit Development Division
650 King Street, Third Floor
Honolulu Hawaii 96813

Re: Comments re March 1990
Alternatives Analysis-Draft Environmental Statement
Honolulu Rapid Transit Development Project

Gentlemen:

Please note a correction to my letter yesterday, under
How will Feeder Bus Transfers affect Ridership?, on page 5,
paragraph 5 thereof, the second sentence should read as follows:

Yet, the percentage (by survey) of existing No
Transfer Trips is 81.6%.

Mahalo!

Dale Evans
Executive Vice President
Mr. Joseph M. Magaldi, Jr.
Department of Transportation Services
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Re: Honolulu Rapid Transit Development Project
AA/DEIS Public Meeting May 8, 1990

Dear Mr. Magaldi:

I am a member of the Ewa Neighborhood Board, a small business owner, and regular commuter from Ewa to downtown Honolulu using the present public transportation system. I have submitted petitions signed by over 400 fellow bus travellers on this issue for legislative consideration.

I am strongly in favor of expedited implementation of the planned Rapid Transit system, using whatever combination of funding means that are necessary to speed the process along. I am not in favor of further studies. My community urgently needs an improvement to the present system, and recent community polls and studies have underscored that need.

As part of the present review process, I would like to suggest the following:

- Formation of a Citizens Advisory Panel to work with city and state planners on current improvements and transition plans for rapid transit. This Panel should include USERS and OPERATORS - regular bus commuters and bus drivers, who understand real and present needs and have a "grass-roots" rather than esoteric agenda. I would further suggest that such a panel be publicized and created through the monthly Bus Pass program, with vendors' support.

- A publicity campaign geared to upgrading public perception of riding present and future mass transit. Regrettably, bus-riding appears to equate with lowered status in the general community conscience, and bus-passenger demographics do not dissuade that negative perception. Such false values are a real drawback to current community efforts to advance support for mass transit.

- Seek commitment from city and state officials to reduce or regulate subsidized parking for government employees, and substantial
encouragement for them to use current public transportation. This would greatly assist image enhancement and commence "training" the community in more widely accepted use of public transportation.

- Increase remote-area Express Bus schedules to alleviate present bus congestion, and encourage more ridership. Ewa Beach and other remote areas buses are strictly SRO now; a comfortable ride to and from work (seated!) is your best advertising for present and future mass transit.

- Plan now for a Waianae-Hawaii Kai line, with the first phase to be Waiawa-University, and GET ON WITH IT. Once it is "real", I believe our citizens and visitors will be enthusiastic supporters.

I would like to take this opportunity to commend our city bus drivers. I have ridden public transportation all over the world; Honolulu's drivers are by far the most courteous, cheerful and helpful. I trust that they will be an important resource in the efforts to come on supporting mass transit.

Thank you for the opportunity to submit these comments.

Paula Z. Helfrich
General Manager
May 8, 1990

Department of Transportation Services
City and County of Honolulu

Dear Committee Members:

I am Tom Ueno, a management consulting partner in Grant Thornton, an international accounting and management consulting firm. I would like to present my views on our need for mass transit and the alternatives we should consider.

I commute each morning from Pearl City to downtown, leaving my home at 6:45 in the morning and arriving at work in about 45 minutes to an hour later. This commute time will increase with the large developments taking place in Ewa, Waipahu and the Mililani areas. We need to solve the transportation problem.

Over the past two years, I have taken several trips to the mainland and have used the mass transit systems in San Francisco, Atlanta, and Washington, D.C. The Metro System in Washington, D.C. is clean, fast, and very convenient. In fact, the Metro will take me from Capitol Hill to downtown Washington, D.C. faster than by cab. The surface streets are clogged with traffic especially in those areas where there is construction.

I believe we need to have a good mass transit system to move people from our suburbs into the city. I have read the Alternatives Analysis and Draft Environmental Impact Statement and note that the city is considering an extension of the bus system and a fixed guideway system. I have read of other mass transit alternatives such as the O-Bahn System which uses buses on raised concrete tracks. The buses travel on these tracks with the use of horizontal guide rollers which guide the vehicles. The buses can therefore travel at high rates of speed with little danger of accidents. To serve the bedroom communities, the buses can get off the guideway and operate as regular buses, going up hills and taking passengers out to the outlying communities. I have read that this system is very economical and in the case of Adelaide, the capital costs were 60% of those for a light rail system.
Hawaii needs to consider all of the alternatives of providing mass transit for its citizens, more than an extension of the bus system or fixed guideway system. We need to keep our minds open and buy what we need for Hawaii, and not more than what is needed.

I appreciate this opportunity to address this committee on this key issue of mass transit for Hawaii.

Very truly yours,

GRANT THORNTON

[Signature]

Thomas T. Ueno
Partner
TTU:If
May 23, 1990

Mr. Amar Sappal  
Project Manager  
Department of Transportation Services  
650 South King Street, 3rd Floor  
Honolulu, HI 96813  

SUBJECT: Honolulu Rapid Transit Development Project  
Comments to Alternative Analysis/Draft Environmental Impact Statement (AA/DEIS)

Dear Mr. Sappal:

Being a professional civil engineer in the transportation area, I cannot pass over the opportunity to comment on rapid transit since this is probably the most important transportation issue facing our people for many years to come. Together with Mr. Ronald M. Tanaka, who has had many years of management and operational experience in the private sector ground transportation area, we have collaborated in preparing this review report.

Let me say, first of all, that my company, Hawaii Pacific Engineers, Inc., is not associated with anyone. Our efforts in reviewing the subject AA/DEIS are strictly voluntary; we are not being paid by anyone. Our sole purpose is to provide unbiased professional testimony that will bring out facts -- facts that would lead to better understanding of the issues at-hand, which, in turn, would lead to intelligent decision making.

We are very much concerned on the presentations of the facts, or the lack of information in some cases, which can be very misleading to the reviewer. Our comments include:

1. There is a lack of meaningful comparisons between transit and the private automobile. With this type of comparison, the attractiveness of transit (bus or rail) can be quickly evaluated and analyzed; transit's ability to attract riders is a key factor in determining the reasonableness of the ridership projections.

2. Transit management philosophies play a key role in the success or failure of the transit system.

3. The key to attaining the forecasted transit ridership lies with management of the transit system.
4. There is a lack of consideration for private paratransit services to supplement the existing bus service under the TSM alternative.

5. There is a lack of efficient feeder service from the residential areas to the transit line under the full-build rail rapid transit alternatives. The potential influence of the feeder system to total transit ridership can be substantial since we view this transit component to be the critical element to lure and attract commuters to the transit line. Private paratransit services, in our view, is an ideal means of providing such services.

6. There is a lack of information related to the projected reduction in auto vehicle trips during the peak hours (AM and PM peaks), the potential reduction in traffic congestion during the peak hours, including statements on expected level of service determinations on the major highway corridors based on the different alternative scenarios. Statements on reduction of auto trips per day is insufficient to make traffic impact determinations.

7. Statements relative to an implementation program are not mentioned. Said implementation program should cover strategies and methods to be employed from the present to opening day of rail rapid transit system, a timeframe which could easily take 10 years. What is being thought off to promote transit ridership during this period to relieve traffic congestion today? The TSM alternative utilizing paratransit vehicles on HOV lanes through the congested areas in downtown Honolulu, in our view, has distinct possibilities and advantages which can promote transit riders for the eventual conversion to a rail system.

All our comments are discussed in detail in the attached review report, including information and data cited by their reference sources. Also, we are including summary highlights of a report entitled "Improving Transit Productivity and Cost Effectiveness: A Review of Promising Strategies", a report prepared for the Urban Mass Transportation Administration, which form the basis for many of our comments.
In spite of all our comments, we recognize the merits and potential of the full-build rail rapid transit system. Therefore, we support the City's position to build such a system in principle. However, we wish to recommend the following in the hopes of improving the system:

1. Institute the TSM alternative now using private paratransit services to supplement the existing bus fleet utilizing a system of HOV lanes through downtown Honolulu. This interim system can become a forerunner system to rail and can promote transit ridership for commuters now for eventual ridership conversion to rail in the future, the by-product being less cars on the road today.

2. Utilize private paratransit services for "door-to-door" type of service: use as rapid transit shuttles from the residential areas to the nearest rail station providing frequent service (10- to 15-minute headways) to these areas. (Note: This same type of service could also be instituted as part of the TSM alternative described under item 1.)

The preparation of our review report is the result of many hours of research and discussion. In the process, we hope that we have made a meaningful contribution for better understanding of your project.

Thank you for giving us an opportunity to comment.

Sincerely yours,

Benjamin S. Tanaka, P.E.

Ronald M. Tanaka

Enclosure: Technical Comments on Honolulu Rapid Transit Development Project Alternative Analysis & Draft EIS
The comments rendered in this review report are not intended to be unjustly critical of anyone, but, to bring out viewpoints and facts which we believe to be important to the overall planning process of the rapid transit system. The views expressed are strictly our own and are the result of our own independent research and study on the subject matter.

COMMENT: There is a lack of meaningful comparisons between transit and the private automobile.

If we were to look at transportation like a business, transportation is the entire market for this industry, of which the private automobile and transit are the market segments of the transportation industry. Historically, transit’s market share (or modal split) has been small, in the order of 8 percent or less of the entire market. By and far, the larger segment has been the private automobile.

Therefore, to keep matters in proper overall perspective, conscious efforts must be made to compare transit with the private automobile to gauge transit’s effectiveness in the overall transportation marketplace.

Let us examine what a person goes through in deciding the travel mode he or she chooses:

Once an Oahu resident has selected a trip destination, his or her next decision involves whether to make the trip as an auto driver or passenger, or take transit (bus or rail). Among factors likely to influence his or her choice of travel mode are availability of an automobile, cost, travel time, convenience and suitability of the mode to suit various other needs (such as freedom and independence to do whatever he or she pleases).
Once a car is available to a person, one's choice of travel becomes apparent: he or she chooses to use the car. This is true unless there are other excruciating circumstances that prevent one from using his or her private automobile, like costs.

This behavioral pattern has continued for many years to a point where traffic congestion on the highways are getting worst and worst since highway improvements cannot keep up with the growing traffic demands. As a result, commute times are getting longer and longer. As this trend continues in the future, the situation reaches a point of impossibility to the commuter. It is not a question whether it will happen; the question is WHEN will it happen.

In this context, it is our belief that the 8 percent or less marketshare for transit is not reflective of the true demand for transit services. It is the result of constraints placed on the existing transit systems which make transit generally unattractive to use in comparison with the private automobile. With the influences of increasing congestions and longer commute times on the highways, we believe that there are unique opportunities for transit to gain a larger marketshare of the transportation industry. This is provided transit can come up with new and innovative ways of providing attractive alternatives to driving one's car; IT MUST BE ABLE TO COMPETE WITH THE PRIVATE AUTOMOBILE, ESPECIALLY IN TOTAL TRAVEL TIME FROM ORIGIN TO DESTINATION. IT MUST BE ATTRACTIVE, CONVENIENT AND RELIABLE. Private paratransit services is a means that can provide such services.

COMMENT: Transit management philosophies play a key role in the success or failure of the transit system.

Tables 1, 2, 2A and 3 were developed from MTL records, TheBus system fact sheet, 1980 to 1989. Table 1 show statistics relative to total boarding passengers; Table 2 shows total initial boarding passengers; Table 2A shows total initial boarding passengers adjusted to reflect true transfer rates based on the On-Board Rider Survey, November 1986; and Table 3 shows total revenue passengers.

Differences in "bottomline" performance of management and administration are noted between 1980 to 1983 and between 1984 and 1989. From 1980 to 1983, the productivity yield (measured by weekday pax/bus) increased despite a decrease in bus fleet. From 1984 to 1989, the reverse is true; the bus fleet increased but the productivity decreased.
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* Estimated at 1.142 x Average Daily Passengers based on On-Board Rider Survey, November 1986

Source: MTL Records The Bus System Fact Sheet 1980-89
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* Estimated at 1.142 x Average Daily Passengers based on On-Board Rider Survey, November 1986

Source: MTL Records
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* Estimated at 1.142 x Average Daily Passengers based on On-Board Rider Survey, November 1986

** Adjusted to reflect 18.4% transfer rate

Source: MTL Records
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<td>462</td>
<td>55,075,000</td>
<td>150,900</td>
<td>172,300</td>
<td>373</td>
</tr>
<tr>
<td>1989</td>
<td>475</td>
<td>54,873,000</td>
<td>150,300</td>
<td>171,600</td>
<td>361</td>
</tr>
</tbody>
</table>

% Change 1984-89:

+14.5% -1.9% -1.9% -1.9% -14.5%

* Estimated at 1.142 x Average Daily Passengers based on On-Board Rider Survey, November 1986

Source: MTL Records
The Bus System Fact Sheet 1980-1989
This type of poor management performance cannot be tolerated nor condoned. Substantial public funds were expended to purchase additional busses to increase ridership, not decrease ridership. The public interest is not being served by this type of poor performance.

Based on this case history on transit management, we strongly believe that the performance of transit is greatly influenced by management and its philosophies. If management's philosophies is "lay-back" and status quo, then the transit system performance will be mediocre and poor. If management aggressively promotes and markets for new business and improves service, then the system’s performance should show considerable improvement.

COMMENT: The key to attaining the forecasted transit ridership lies with management of the transit system.

Table 4 shows broad transportation parameters. Such parameters as weekday person trips, weekday transit trips, transit modal split (or marketshare) as a percentage of total person trips, and weekday auto trips are presented for Years 1980, 1986, 2000 and 2005. Appropriate information from the AA/DEIS, the HALI 2000 study report, MTL statistics, and State Department of Transportation traffic data are used.

From the information on Table 4, transportation projections on Table 5 were developed using the growth trend of the weekday person trips between 1980 and 1986 and extrapolating values for Years 2000 and 2005. Subtracting known values for weekday transit trips and dividing the remainders by 1.5 person per auto, values for weekday auto trips were derived for Years 2000 and 2005.

The information presented in Tables 4 and 5 may not be totally accurate, but, they do give an indication of the transportation trends for the future. Some of the preliminary conclusions that can be reached are:

1. The City's forecasts appear to be conservative.
2. The modal split for transit is still relatively small running in the neighborhood of 7+ percent.
3. The number of auto trips will continue to grow, even for the full-build rail rapid transit alternative, which suggests highway congestion will get worse, not better.
<table>
<thead>
<tr>
<th></th>
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<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Weekday Person Trips</td>
<td>2,500,000*</td>
<td>2,681,000^</td>
<td>3,200,000*</td>
<td>2,940,000&gt;</td>
</tr>
<tr>
<td>Weekday Transit Trips</td>
<td>190,000**</td>
<td>191,000**</td>
<td>260,000+</td>
<td>260,000+</td>
</tr>
<tr>
<td>% Trips by Transit</td>
<td>7.6</td>
<td>7.1</td>
<td>8.1</td>
<td>8.8+</td>
</tr>
<tr>
<td>Weekday Auto Trips (based on 1.5 persons/car)</td>
<td>1,540,000</td>
<td>1,660,000&lt;1,960,000</td>
<td>1,787,000</td>
<td></td>
</tr>
</tbody>
</table>

* From HALI 2000 Study, June 1984

** From Table 2A, MTL Statistics, Total Annual Initial Boarding Passengers (Adjusted)

+ From AA/DEIS, Transit Ridership for Alternative 4

> Calculated: 260,000 = 2,940,000

< Calculated: 1980 Auto Trips x 107.8% = 1986 Auto Trips

where

107.8% represents growth rate for auto trips between 1980 to 1986 for screenlines, Nuuanu Stream and Manoa-Palolo, based on State DOT traffic data

^ Calculated: 1,660,000 x 1.5 + 191,000 = 2,681,000
Table 5
TRANSPORTATION PROJECTIONS

<table>
<thead>
<tr>
<th></th>
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<th></th>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Weekday Person Trips</td>
<td>2,500,000*</td>
<td>2,681,000</td>
<td>3,134,000</td>
<td>3,296,000</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>(3,200,000*)</td>
<td>(2,940,000)+</td>
</tr>
<tr>
<td>Weekday Transit Trips</td>
<td>190,000**</td>
<td>191,000**</td>
<td>230,000++</td>
<td>260,000+</td>
</tr>
<tr>
<td>% Trips by Transit</td>
<td>7.6</td>
<td>7.1</td>
<td>7.3</td>
<td>7.9</td>
</tr>
<tr>
<td>Weekday Auto Trips (based on 1.5 persons/car)</td>
<td>1,540,000</td>
<td>1,660,000</td>
<td>1,936,000</td>
<td>2,024,000</td>
</tr>
</tbody>
</table>

* From HALI 2000 Study, June 1984
** From Table 2A, MTL Statistics, Total Annual Initial Boarding Passengers (Adjusted)
+ From AA/DEIS, Transit Ridership for Alternative 4
++ From AA/DEIS, Transit Ridership for TSM Alternative
Table 6 illustrates transit trips relative to auto trips for Year 2005 for the No-Build, TSM and the full-build rail rapid transit alternatives. An enhanced full-build rail alternative is also shown, an alternative which is assumed to command a higher modal split of 10 percent.

It is noted that as weekday transit trips increase, weekday auto trips decrease by a corresponding amount.

Also, based on the estimated value of 1,740,000 trips for 1990 auto trips, it is significant to note that all alternatives show worsening traffic conditions in varying degrees over current levels. If 1990 auto trips were to remain constant at 1,740,000 trips in Year 2005, the modal split for transit would have to reach 20.8 percent, which, in our view, is not possible. This means that current commute times will increase substantially over current levels; i.e. 1-hour commutes today will take 1-1/2 to 2 hours in the future.

Based on this type of scenario, it would appear that the market opportunities to convert drivers to transit are good. The challenge to management is to exploit these opportunities by finding new and innovative ways to lure and attract commuters to transit. At current market levels (7+ percent modal split), in our estimation, there is considerable room for transit to expand.
Table 6

ILLUSTRATION SHOWING TRANSIT TRIPS
IN RELATION TO AUTO TRIPS
YEAR 2008

<table>
<thead>
<tr>
<th>ELEMENT</th>
<th>NO-BUILD</th>
<th>TSM</th>
<th>FULL-BUILD RAIL</th>
<th>FULL-BUILD RAIL(ENH.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Weekday Person Trips</td>
<td>3,296,000</td>
<td>3,296,000</td>
<td>3,296,000</td>
<td>3,296,000</td>
</tr>
<tr>
<td>Weekday Transit Trips</td>
<td>193,000*</td>
<td>230,000*</td>
<td>260,000*</td>
<td>330,000</td>
</tr>
<tr>
<td>% Trips by Transit</td>
<td>5.9</td>
<td>7.0</td>
<td>7.9</td>
<td>10.0</td>
</tr>
<tr>
<td>Weekday Auto Trips (based on</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.5 persons/car)</td>
<td>2,069,000</td>
<td>2,044,000</td>
<td>2,024,000</td>
<td>1,977,000</td>
</tr>
<tr>
<td>Estimated 1990 Auto Trips</td>
<td>1,740,000</td>
<td>1,740,000</td>
<td>1,740,000</td>
<td>1,740,000</td>
</tr>
<tr>
<td>% Auto Traffic Increase Over</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1990 Levels</td>
<td>18.9</td>
<td>17.5</td>
<td>16.3</td>
<td>13.6</td>
</tr>
</tbody>
</table>

* From AA/DEIS, Transit Ridership
for No-Build, TSM and Alternative 4
COMMENT: There is a lack of consideration for private paratransit services to supplement the existing bus service under the TSM alternative.

First of all, the TSM alternative, in its present form, is absurd and totally unrealistic. Increasing the present bus fleet by 110 percent for a 19 percent ridership gain does not make any economic sense. All this does is to perpetuate the current situation, the performance of which has been dismal. Also, for this very reason, the comparisons between the TSM alternative with the other rail alternatives in the Cost Effectiveness analysis must be questioned as to their validity.

Quite frankly, we are surprised that input from the private sector was not requested in any of the transit alternatives, including the TSM alternative. With private sector input, there would have been substantial differences in the formulation of the alternatives, including the number of busses required, capital cost expenditures, and, operational and maintenance costs. We will attempt to bridge this information void in our report.

We cannot understand why private paratransit services were not considered under the TSM alternative to supplement the existing bus system in the AA/DEIS. This is especially relevant since an UMTA report, "Improving Transit Productivity and Cost Effectiveness: A Review of Promising Strategies", suggested methods and strategies using paratransit vehicles to overcome the economic inefficiencies of a fixed-route bus system (See Appendix A for synopsis of report).

Another important article recently appeared in the American Society of Civil Engineers' Journal of Urban Planning and Development, May 1990. In this report, several instances are cited where private firms have taken over bus services from a public entity which resulted in substantial savings to government in the order of 40-50 percent. Services were contracted by local governments using competitive bids. There were cost or deficit reductions as a result of the contracted services. Much of the savings were attributed to a reduced cost of labor - wages and benefits.

Both reports mention Section 13(c) of the Urban Mass Transportation Act, which preserves the collective bargaining and other rights of union laborers in the event of public takeover of an existing service. Bus route replacements funded with federal monies were terminated because of allegations that they violated the labor protections provided
under Section 13(c). Similar services implemented by state funds, however, were not similarly restricted and continued to operate. The other way to comply with Section 13(c) provisions is to follow federal policy which would necessitate receiving a Section 13(c) certification prior to receiving federal funds; such certification could be obtained without submitting to the use of union labor.

The system of paratransit vehicles consists of taxis, vans, mini-busses and buses providing almost door-to-door express commute service during the morning and afternoon peak hours. It would pick up people fairly close to their homes and transport them to their place of work or school, and vice versa.

It is a system that can be implemented immediately utilizing the existing resources of the ground transportation industry on Oahu (taxis, tour bus companies, etc.). Therefore, this system has the distinct advantage of providing immediate solutions to our current traffic congestion problems. It should appeal to all resident of Oahu and would give people who currently drive to work (or school) an attractive alternative.

The cost effectiveness of the paratransit system basically means the cost to transfer one passenger from the start of the trip to its final destination. The cost per hour or per mile varies depending largely on the vehicle passenger capacity: busses - 40 or more seating passengers; mini-busses - 17 to 25 seating passengers; vans - 7 to 15 seating passengers; and taxis - 5 to 7 seating passengers.

Shared-ride taxis and vans operated by independent drivers are the most economical means of transportation: up to 8 miles for taxis and 15 miles for vans. Charges accrue from the time of pickup to discharge. The use of the proper passenger capacity vehicle based on the number of passengers and distance is the determining factor.

Let us present an illustration of costs based on this scenario. Maximum taxi charges, which are mandated by city ordinance, are: $2.60 for the first mile and $1.40 for each subsequent mile.

For 8 miles, the charges for a 7-pax taxi would be $12.40 each trip, or $24.80 per round trip per day. Assuming a 20-day work month, the charges for the month would be $496. Dividing by 7, the per person cost per month is about $71.
For 15 miles, the charges for a 15-pax van would be $22.20 each trip, or $44.40 per round trip per day. Again, assuming a 20-day work month, the charges for the month would be $888. Dividing by 15, the per person cost per month is about $59.

Taking an average of the two conditions, the average per person cost per month would be about $65. If the program is to reach a threshold level of 20,000 commuters each month, the annual cost to operate this system would be $15.6 million with no capital expenditures involved to implement the paratransit system.

Direct comparisons with the City’s TSM alternative can be made:

**Capital Costs:**

<table>
<thead>
<tr>
<th></th>
<th>City’s TSM Alternative</th>
<th>Paratransit Alternative</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>$381.0 million</td>
<td>$151.2 million</td>
</tr>
<tr>
<td>Difference</td>
<td></td>
<td>$231.8 million</td>
</tr>
</tbody>
</table>

* Assumed same costs as no-build bus alternative

**Annual Operating and Maintenance Costs:**

<table>
<thead>
<tr>
<th></th>
<th>City’s TSM Alternative</th>
<th>Paratransit Alternative</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>$110.8 million</td>
<td>$96.5 million</td>
</tr>
<tr>
<td>Difference</td>
<td></td>
<td>$14.3 million</td>
</tr>
</tbody>
</table>

* Assumed same O&M costs as no-build bus alternative plus $15.6 million

There are many other variations possible with the paratransit alternative which is very flexible. They may be other opportunities, like using paratransit vehicles as feeders to the bus trunk lines, which may make a lot of sense to implement.

Important features of the TSM alternative include the following actions:
1. Establish HOV lanes direct from Leeward, Central, Windward Oahu and East Honolulu into the congested downtown Honolulu area. This is an essential element that would provide needed incentives for increased transit/shareriding utilization by decreasing total travel times for these modes of transportation at the expense of the single-occupancy vehicles (SOVs).

To begin such a system, we can identify Dillingham Boulevard from Middle Street to King Street and extending from King Street into downtown Honolulu as a key initial element. Dillingham Boulevard is a 5-lane road, two lanes in each direction with a reversible left-turn lane. There is an opportunity to create a 3rd inbound lane by coning during the morning peak hours(s). Likewise, if necessary, the reverse would be true for the afternoon peak hour(s). Instead of using the newly created lane for regular traffic, it would be utilized as a HOV lane. The HOV lane would extend onto King Street into downtown Honolulu by assigning one of the four lanes for HOV use.

HOV lanes already exist on the H-1 and H-2 Freeways. From Windward Oahu, a contraflow lane is being pursued by the State on Likelike Highway. This lane could be designated as a HOV lane and extended through Kalihi Street to Dillingham Boulevard.

Incidentally, in all rail alternatives proposed by the City, Dillingham Boulevard is identified on the rapid transit alignment. Consequently, the HOV lane on Dillingham Boulevard can simulate the ultimate rapid transit alignment, and, therefore, can uniquely promote ridership for the eventual conversion to rapid transit.

It is important to note that the use of the HOV lanes must be strictly enforced to discourage single-occupant drivers from using the HOV lanes. Stiff fines must be in place for violators.

The use of HOV lanes should always have top priority over the SOVs. Plans for additional HOV lanes should be studied and prepared well in advance so that when its increasing use is imminent, it can be quickly implemented, as required.
Reduction of travel time is critical, especially for busses. With a combination of travel time reduction and an increase in service frequency, there is a strong and realistic potential for substantial increases in bus ridership.

2. Contract private paratransit services (taxis, vans, mini-busses, busses) for use as feeder lines to trunk lines and direct express bus services by competitive bid process. The types, sizes and frequencies of vehicular services would be adapted to suit demand. For instance, in heavy demand areas, 40-passenger busses would be utilized; in contrast, for areas of small ridership, vans or taxis can be used. In any case, headways should be kept to a minimum of 10-15 minutes to assure quality of the service. Thus, the lost time due to waiting by the passenger can be greatly minimized thereby shortening the total travel time from origin to destination. The efficiency gained in total travel time should enhance the service, thus encouraging greater ridership for the service.

3. Utilize TheBus more effectively. The busses displaced by the paratransit service can be more effectively utilized on the local trunk lines and on the express bus routes thereby increasing the frequency of service on these routes. There should be no overall displacement of equipment and labor.

COMMENT: There is a lack of efficient feeder service from residential areas to the transit line under the full-build rail rapid transit alternatives.

Short-haul rapid transit shuttles direct from residential areas to the nearest rapid transit station is essential if the quality of the total transit system is to be maintained. The essence of the service must meet public demands for total travel time, frequency and timeliness of the service. Taxis and other paratransit vehicles are ideal for this purpose to enhance ridership potential of the rapid transit line. Within a 5-mile radius, there is no public transportation service that can provide service at less cost per passenger, less travel time, more frequent and timely service regardless of the number of passengers served than the taxis.
COMMENT: There is a lack of information related to the projected reduction in auto vehicle trips during peak hours (AM and PM peaks), the potential reduction in traffic congestion during the peak hours, including statements on expected level of service determinations on the major highway corridors based on the different alternative statements.

Figure 4.6, Projected Reduction in Auto Vehicle Trips, shown as thousand trips per day, appears on page 4-22.

Based on our analysis which appears on Table 6, page 11, the number of diverted auto trips per day in comparison with the AA/DEIS values are:

TSM vs. No-Build: 25,000 trips (26,400 trips)*
Rail vs. No-Build: 45,000 trips (48,000 trips)*

* AA/DEIS values

Based on this comparison, the City's values for diverted auto trips per day appear to be reasonable.

What is more relevant is the diverted auto trips during the highest one-hour period during the AM and PM peaks. What is the highway condition, expressed in level of service, for the No-build alternative? What is the highway condition, again expressed in level of service, for the TSM and all the rail alternatives? Is the reduction in traffic on the highway significant? If so, where?

Correlating the results on Table 4.2, Transit Travel Times - Peak Period, with peak period traffic conditions cannot be made since the former is not represented in the report. Also, as previously mentioned, comparing transit travel times between transit scheme may not be all that important. What might be important is to compare each condition or alternative with the private automobile travel time on this same table. This will give an idea how attractive transit is compared to the private automobile since the car is in direct competition with transit.
COMMENT: Statements relative to an implementation program are not mentioned in the AA/DEIS.

The questions should be asked: "What is being thought off to promote transit ridership to relieve traffic congestion today? Isn’t traffic congestion bad enough today to warrant immediate actions from our government officials instead of waiting 10 years for rail?"

The answers to these questions should be obvious. It is, in this context, that we strongly favor the implementation of the TSM alternative using private paratransit services as the forerunner system to the full-build rapid transit system. As discussed earlier, it has distinct possibilities and advantages which can promote transit riders for the eventual conversion to a rail system. Also, it is a very viable way of addressing today’s traffic problems today while time is being spent to plan the ultimate rail system.

1. Pilot Program for Paratransit System

To test the effectiveness of the paratransit proposal, it is recommended that a pilot program be initiated. Funding in the range of $10-12 million would be required to subsidize this program for two years with the goal of attracting 10,000 riders to use the system by the end of the 2nd year.

Besides testing out the concept, the funds can be utilized to undertake a study to establish a factual database on transit riderships for commute trips from the outlying residential areas to downtown Honolulu. It can provide the means to more accurately assess the potential of converting drivers to other modes of transportation taking into account social and economic attitudes of individuals. It would shed important new information for intelligent decision making on rapid transit.

2. HOV Lane

Legislation is required to strictly enforce and discourage single-occupant drivers from using the HOV lane. Stiff fines ($100 or more per occurrence) must be in place for violators. Provisions for “ticketing by mail” should be added.
3. Share-Ride Taxis

The law relating to share-ride taxis, Act 286, should be amended to increase the passenger vehicle capacity from 8 to 15. This would encourage taxis to be available in greater numbers inasmuch as they provide the most economical means of transportation within 15 miles.

In the longer term, we definitely favor the full-build rail rapid transit system since we can recognize the merits and potential of this system. We can foresee that the ridership potential of the system is much higher than what is reported, perhaps easily exceeding 300,000 weekday trips. No other system can accommodate such a high volume of trips.
Symptomatic problems associated with existing transit lines are identified in this report:

- The costs of fixed-route bus services were high and were increasing;
- Fare revenues were low and were decreasing; and
- Local operating subsidies were increasing each year.

Methods and strategies are discussed to counter the stated problems:

- The productivity impacts of actions to increase competitive forces in the providing of urban public transportation services are discussed. In particular, the use of "supplemental carriers" to help provide peak-period service, thereby, reducing the peak vehicle and labor requirements for core public transit systems are fully addressed. The use of explicit service or productivity standards with financial damages or incentives to encourage improvements are also mentioned.

- Methods tailoring supply to match the demand patterns are discussed. These include:
  - The use of small-vehicle paratransit services to serve riders in less densely populated regions of urban areas, as a replacement for 40-foot busses operating on fixed routes.
  - The use of different types of services (or vehicles) at different hours of the day or days of the week to match varying ridership levels.
  - Adopting a differential fare structure to better reflect the cost differences of providing service in peak periods or for trips of longer distances.
BIBLIOGRAPHY


MTL Records, TheBus System Fact Sheet, 1980-89

Wilbur Smith and Associates, HIAL 2000 Alternatives Analysis, Oahu Metropolitan Planning Organization, 1984

State of Hawaii Department of Transportation, Traffic Summary, Island of Oahu, 1986
Hawaiian Dredging & Construction Company

May 15, 1990

Mr. Amar Sappal, Project Manager
Rail Transit Development Division
City and County of Honolulu
450 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Gentlemen:

We appreciate this opportunity to testify in support of the Rapid Transit Development for Honolulu now being proposed by Mayor Fasi and endorsed by Governor Waihee.

We believe that the long-term benefits of Rapid Transit will far outweigh the short-term negatives, and future local commuters will experience:

- Shorter commuting times
- Reduced traffic congestion
- Reduced air pollution
- Reduced oil imports and energy conservation.

It has been said that Honolulu has been talking about Rapid Transit for 20 years. The completion of the very impressive Alternatives Analysis/Draft Environmental Impact Statement by Parsons Brinckerhoff sets the stage for the project to move over the remaining hurdles. We believe that now is the time to get it done.

Very truly yours,

HAWAIIAN DREDGING & CONSTRUCTION COMPANY

[Signature]

James R. Perry
President & Chief Executive Officer
May 9, 1990

Mr. Benjamin B. Lee
Chief Planning Officer
Department of General Planning
City and County of Honolulu
650 South King Street, 8th Floor
Honolulu, Hawaii 96813

Dear Mr. Lee:

Subject: Alternatives Analysis/Draft Environmental Impact Statement for Honolulu Rapid Transit Development

We have reviewed the draft EIS and have the following comments:

1. On pages 5-47, a reference is made concerning the identification of utility problems and resolution of these prior to construction, we would like to add that the proposed Fixed Guideway system will have a major impact on HECO’s 138 KV transmission facilities. It is estimated that approximately 15-20 steel poles may have to be relocated along the route at an approximate cost of $2 million. In addition, the Iwilei-Archer 138 KV Underground line may be required to be relocated at an approximate cost of $1 million.

2. There is no mention of substations in the draft EIS. Presumably, substations will be required in order to serve the system.

Sincerely,

[Signature]

cc: Mr. Amar Sappal, Project Manager
Department of Transportation Services, RTDD
HILTON HOTELS CORPORATION
Dieter H. Huckestein
Senior Vice President
Hawaiian Region

TESTIMONY IN SUPPORT OF
MASS TRANSIT AND THE UMTA APPROVED DRAFT EIS
Department of Transportation Services
City and County of Honolulu
Tuesday, May 8, 1990
State Capitol Auditorium

My name is Dieter Huckestein, Senior Vice-President of Hilton Hotels in Hawaii. I am here today to encourage you, along with many others, to expedite selection of a route and approval of mass transit for Honolulu.

From the perspective of an employer of over 2200 of Oahu's residents, and the host of many thousands of visitors a year, we need to address our transportation problems today. It is clear that we cannot continue to tolerate our present situation indefinitely. It is equally clear that a mass transit system for Oahu will help visitor and resident alike. In providing one, we will make Hawaii an even better place to visit and in which to live.

The need for mass transit is obvious. Of the alternative routes, the Airport corridor connecting to Waikiki and UH with an underground section via Hotel Street is best. It has less of an impact on residential areas, brings people directly Downtown and has the highest estimated ridership. A draft EIS has been completed and approved by UMTA. We have a funding source. Now it will take action on your part.

The Legislature made some hard choices this past session. It took the personal intervention of the Governor and two extensions of the session to make transit funding a reality. Let's not drop the ball now.

Thank you for your time and consideration.
Tuesday, May 8, 1990

Mr. Joseph M. Magaldi, Jr.
Deputy Director
Department of Transportation Services
Rapid Transit Development Division
3rd Floor, NCR Building
720 Kapiolani Boulevard
Honolulu, Hawaii 96813

HONOLULU Reply Address
John L. Hill, President
Honolulu Transit Corporation
Century Square, Suite 1203
1188 Bishop Street
Honolulu, Hawaii 96813
Telephone: (808) 544-0963
Fax No.: (808) 542-0786
Attention: Secretary
Natella Francisco

RE: TESTIMONY - PUBLIC HEARINGS, MAY 8, 1990
HONOLULU RAPID TRANSIT DEVELOPMENT PROJECT

Dear Mr. Magaldi:

In response to your Department’s advertisement in the Honolulu Advertiser dated Wednesday, April 16th, 1990, I submit the following TESTIMONY.

My name is John Lawrence Hill, President of HONOLULU TRANSIT CORPORATION, a recently incorporated Honolulu based corporation, representing an international consortium of companies specializing in the transportation industry, as per attached list: (Appendix A). (Note, three packages and reports.)

With the combined strength of the international consortium and a joint venture partnership with Honolulu based corporations, Honolulu Transit Corporation is prepared to make a positive bid for the construction and supply of a unique, low cost transit system and new technology that can substantially reduce the capital cost of the proposed Honolulu Rapid Transit Development Project.

You will note from the attached Table of Contents, an Appendix of correspondence, that confirms my negotiations with your Department of Transportation Services since October 24th, 1989, when I first presented our PRELIMINARY PROPOSAL, AS AN ALTERNATIVE TRANSIT SYSTEM, BY INTEGRATING THE YON-KECH-KC-MCGRATH AND O’KEE- KJEN SUBWAY TRANSIT SYSTEM.
As you know, the same PRELIMINARY PROPOSALS have been presented to the Honorable John Waihee, Governor of Hawaii, State of Hawaii, Department of Transportation, various politicians of the House and Senate and all City Council members for consideration of this new proven transit technology.

A Bill For An Act No. 2572 Relating to Transportation, was introduced, at my request, by the Honorable Paul Chun, to generate interest in our H.T.C. CONCEPT. (Note copy attached dated January 19, 1990.)

On Wednesday, March 14, 1990, I presented a TESTIMONY TO THE SENATE AND HOUSE TRANSPORTATION COMMITTEE IN SUPPORT OF "A BILL FOR AN ACT S.B. 3128 - RELATING TO TAXATION." (Note copy attached)

Now that the Legislature has approved a dedicated source of funding, it is VITAL THAT YOUR DEPARTMENT OF TRANSPORTATION SERVICES PROCEEDS TO RELEASE THE R.F.P., REQUEST FOR PROPOSALS, WITHOUT FURTHER DELAY SO THAT FREE ENTERPRISE CAN CONTRIBUTE THEIR TECHNOLOGY TO RESOLVE THE GROWING GRIDLOCK TRAFFIC PROBLEMS IN HONOLULU.

For all the reasons set out in the attached correspondence, our H.T.C. TEAM REQUEST AN ASSURANCE IN WRITING FROM YOUR DEPARTMENT THAT THE O'BAHN BUSWAY AND VON ROLL MONORAIL TRANSIT SYSTEMS WILL QUALIFY UNDER THE R.F.P. SPECIFICATIONS.

FAILURE TO DO SO WILL DENY THE PEOPLE OF HONOLULU THE BENEFITS OF A PROVEN ALTERNATIVE TRANSIT SYSTEM THAT IS SUBSTANTIALLY LOWER IN COST, COMPARED TO THE LIGHT RAIL SYSTEMS PROPOSED - FAR MORE FLEXIBLE AND EFFICIENT THAN ANY OTHER TRANSIT SYSTEM IN THE WORLD TODAY.

As Dr. Niemann, Executive of the Mercedes-Benz Company stated in his recent letter to me - "THE O'BAHN IS AN OPTIMUM SOLUTION FOR THE TRANSPORTATION PROBLEMS IN THE CITY OF HONOLULU."

In regard to the A.A./T.I.E.S. Report, I shall submit a detailed summary of recommendations to you before the closing date of May 23, 1990.

May I take this opportunity to congratulate you and your hard-working staff in achieving the (U.N.T.A.C.) formal approval and a dedicated source of funding for the Honolulu Rapid Transit Development Project.

That was a major accomplishment after over twenty five years of debate.
Mr. Joseph M. Kagaldi, Jr.
Deputy Director
May 8, 1969
Page 3

Our R.T.C. TEAM looks forward to working with your Rapid Transit
Project Team with the objective of implementing the most proven and
efficient transit system in the world for the BENEFIT OF THE PEOPLE
OF HONOLULU.

I would be happy to answer any questions.

Assuring you of our dedicated cooperation.

Sincerely,

John L. Hill
President

JLH:
Enclosures: 3 Packages/copy correspondence, brochures and reports.
May 7, 1990

Dear Committee Members,

My name is Randy Havre and I am the president of J.B. Havre Securities, Inc. and Kama 'aina Rehabilitation, Inc., both Hawaii corporations. I appreciate this opportunity to express my personal feelings regarding the "mass transit" issue.

First of all, I pride myself on being a very practical person and the proposed transit systems I have seen touted in the media need to stay in places such as Disneyland. There is no doubt that we need relief from our traffic congestion, but it should be a system that will be used by all of Oahu and not just those between Pearl City and U.H.

What we've learned over the last decade is that our bus system is well accepted, especially the express buses. This should be our number one priority: to increase and enhance the bus system with dedicated lanes & routes, more frequent schedules, and better riding conditions. Such a system would benefit all the people on Oahu.

Then, as a second priority, we could build a light rail system to move our six million plus visitors back and forth from the airport and our proposed convention centers.

I urge the committee to consider this more practical, less expensive mass transit alternative and to look closely at the existing G-Bahn system in South Australia, which is now operating successfully in the manner I just described.

Mahalo,

Randolph C. Havre
President
May 16, 1990

Mr. Joseph M. Magaldi, Jr.
Department of Transportation
City and County of Honolulu
Honolulu Municipal Building
650 South King Street
Honolulu, Hawaii - 96813

Dear Mr. Magaldi:

This is written in response to your letter dated March 23, 1990 with the Alternative Analysis/Draft Environmental Impact Statement for the Honolulu Rapid Transit Development Project.

Upon purchase of Cultural Plaza in 1979, this corporation has worked diligently toward promoting business opportunity by providing rental spaces for local businesses and services, and providing cultural activities for the local community. Cultural Plaza has become a unique gathering place for annual activities. This is a great accomplishment and we feel we have contributed to the prosperity of Honolulu and Sino-American relationship.

For many years this corporation has discovered the potential of the existing land for more services to the community. We have been studying a reconstruction plan and have recently been trying to raise the necessary capital to fund the new development that will meet the trends and needs of this city. After many years of research and study, this development plan is about ready to be finalized. The project contains: (1) a high-class residential building or office building, or a combination of both (2) relocation of existing tenants of Cultural Plaza (3) facilities relating to operation, including place of operation, quarters for temporary personnel and employees (4) facilities relating to culture such as exhibition halls (5) facilities in support of local community such as schools, assembly halls (6) parking lot and (7) other.

We are informed in your letter that Cultural Plaza is on one of three possible lines and that Cultural Plaza may be used as a site for a station. If this becomes a reality, the long range plan that we have been working on for many years would be nullified. We estimate the loss of land and construction area to be as high as 20%. Accordingly, this loss will affect the proposed usage of the rest of the land. In addition, if the route involving Cultural Plaza is accepted, the government would have to pay compensation to us and our tenants. This amount may be a "king's ransom" and would not be feasible to your project.
Joseph M. Magaldi, Jr.
May 16, 1990
Page 2

Please consider the foregoing situation. We do not think a proposed route involving Cultural Plaza would be acceptable to us or our existing tenants and to the taxpayers.

Thank you for this opportunity to voice our opinion.

Very truly yours,

CHANG-JUNG HUAN
General Manager

cc: Mr. Benjamin B. Lee, Chief Planning Officer
   Mr. Amar Seppal, Project Manager
May 10, 1990

Mr. Amar Sappal, Project Manager
Rapid Transit Development Division
Department of Transportation Services
City and County of Honolulu
650 South King Street, Third Floor
Honolulu, Hawaii 96813

Attention: Mr. Tony DePaul

Gentlemen:

Thank you for the excellent presentation of the City’s proposed rapid transit system. As a follow-up to my discussion today with Mr. DePaul, I wish to reiterate that the consideration of the future extensions of the fixed transit to Mililani during the selection of the technology would be appreciated. Our earlier studies indicate that an extension to Mililani, which will include grades up to seven percent and sustained grades exceeding four percent, may have operating conditions which will not be present in the initial segment. Hopefully, the performance specifications included in the request for proposals will accommodate the possible future extensions.

Your efforts in advancing the rapid transit proposal are greatly appreciated. I know that even with no extensions, residents in all parts of Oahu will benefit from the increased bus service which would result as the fixed system is put into service.

Sincerely,

MILILANI TOWN, INC.

Julian Ng, Manager
Planning and Engineering

xc: Lucien Wong
Wally Miyahira
Darrlyn Bunda
May 23, 1980

Mr. Benjamin B. Lee, Chief Planning Officer
Department of General Planning
City and County of Honolulu
650 S. King Street, 8th Floor
Honolulu, Hawaii 96813

Dear Mr. Lee:

If Oahu is to continue to be an economically vital and attractive place to live, work, and visit, we must be prepared to move people and goods efficiently and effectively. Our overall mobility needs will require an array of available travel options to accommodate the increasing travel demands of both work and non-work trips, not just peak hour demands. We cannot continue to expect our streets and highways to bear our ever-increasing travel demands, without suffering the costly and stressful effects of traffic congestion.

A rapid transit system for Oahu will offer an efficient, additional transportation alternative to accommodate our growing mobility needs - present and future. It will play an important role, together with all forms of ridesharing and paratransit services, towards a comprehensive transportation systems and demand management (TSM and TDM) program. The addition of a rapid transit option will provide the basis from which parking management strategies, transit incentive programs, and other demand management tactics can be implemented.

Our transportation needs have changed drastically over the last 20 years, and so will it change over the next 20 years. Our vehicle population, which increased over 120% in the last 20 years, continues to outstrip population growth. Our workforce population has increased dramatically as a result of more jobs, more working women and more persons of working age (baby boomers).

Increased employment in Ewa will not reduce Oahu's overall traffic and mobility problems. The planned residential and employment growth in the Leeward Oahu region will require transportation systems and services that can accommodate new
Mr. Benjamin Lee, Chief Planning Officer
May 23, 1990

and increased-travel demands to, from and within the region. In 20 years, the Ewa and Central Oahu region will hold nearly 30% of Oahu's population. Ewa, alone, will experience a 243% growth - from a 1988 population of 38,682 to an expected population of 132,900 in the year 2010.

The recent formation of the Leeward Oahu Transportation Management Association (LOTMA) is intended to provide unified private sector leadership in working with the city and state to address the transportation demands of a growing Ewa and Central Oahu region, and to actively participate in the development and promotion of efficient transportation systems and services to enhance the region's mobility, economic vitality, and quality of life. Every traffic reduction strategy developed and promoted by LOTMA will be greatly enhanced with the additional travel option afforded by a well-planned rapid transit system.

After reviewing the AADEIS, my major concern is the limited amount of information on supporting bus services and transit accessibility for the Ewa and Central Oahu area. Although reference is made to specific reports that append the AADEIS, a summary of supporting regional bus statistics within the AADEIS would have been helpful for correlative purposes.

Rapid transit ridership potential from the Leeward Oahu region is excellent. There is a demand for transit service that cannot be met with existing express or regular buses. Statistics from the University of Hawaii at Manoa indicate that 20% of its 1988 student population originated from Leeward Oahu. However, until the rapid transit alignment extends beyond the Waialua station, attracting riders from the Ewa and Central Oahu region will depend on superior feeder bus service and convenient auto accessibility from the H-1 and H-2 freeways. In view of this, every consideration must be given to 1) minimize the number of transfers needed to complete a trip, 2) ensure the direct accessibility to the Waialua transit facility from the H-1 and H-2 and Kamehameha Highway, and 3) maximize ridership potential by assuring that Ewa and Central Oahu will be effectively and efficiently served by feeder buses.

Specifically related to Leeward Oahu, the following are my two major points of concern:

1. Waialua terminus/maintenance yard - I am concerned that only the 43-acre Navy Drum Storage site off Farrington Highway is cited to serve as the sole
Mr. Benjamin Lee, Chief Planning Officer  
May 23, 1990

Transit facility for all potential riders north and west of the Waiakea interchange. The location of this site will require costly land acquisition and the construction of a new overpass and on/off-ramps to improve accessibility to the station. It is also unclear whether 1) Leeward College will have direct access to the transit station and 2) Direct access from H-1 and H-2 will be made possible with the new overpass/on and off ramps. The AADEIS is vague as to the proposed overpass and on/off ramps, not providing adequate assurance that there will be easy auto access from the H-1, H-2 and Kamehameha Highway.

Recommendation: I suggest serious consideration be given to the use of the 23-acre site adjacent to Kam Highway and below the Seaview subdivision as an additional transit facility. Already earmarked for dedication to the City for use as a park and ride or transportation facility, its location offers direct access off the H-1, H-2, and Kamehameha Highway. This convenient location would also permit faster, more efficient feeder bus trips serving the Central Oahu corridor, where the population is expected to reach 156,000 by 2010, an increase of 28,277 from 1988 figures, not to mention eastbound bus service from the H-1.

2. Supporting bus services - Efficient bus service and timely connections to a rapid transit station will be a critically important factor in attracting riders from the Ewa and Central Oahu areas. However, aside from tables indicating average buses per hour and peak/off-peak service headways for various service areas, the AADEIS affords little description or explanation of proposed regular/feeder bus routes and the headways involved. This raises concerns about the level of bus service to adequately feed the rapid transit line and to sufficiently provide inter-community bus needs.

I appreciate the opportunity to comment on the AADEIS.

Sincerely,

[Signature]

Darryl T. Bunda  
Paratransit Coordinator and  
President of the Leeward Oahu Transportation Management Association

/ cc: Mr. Amar Sappal, Project Manager
Mr. Joseph Magaldi  
Deputy Director  
Department of Transportation Services  
City & Council of Honolulu  
650 S. King Street  
Honolulu, Hawaii 96813  

Dear Mr. Magaldi:  

As a member of the Honolulu Mass Transit Coalition and the Tourism Industry, I believe that Mass Transit is what is needed for Honolulu.  

There have been discussions over the last decade or so regarding the need for a mass transit system here. While the idea has been debated over and over, for various reasons, the residents have had to endure longer and longer traffic jams, as the ever-increasing number of vehicles take to the road. Being on an island, we cannot continue to expand and build roads because of the limited amount of land, and more asphalt will certainly affect the quality of Hawaii's natural environment. More asphalt will most certainly not enhance the natural beauty of Hawaii, on which the number one industry, Tourism, depends on. Mass transit is the answer.  

Let us move ahead on a Mass Transit System, for the sake of our environment, health, and may I add, our sanity.  

Cordially,  

Richard R. Kelley  
Chairman & CEO
May 17, 1990

Mr. Amar Sappal
Project Manager
Rail Transit Development Division
City and County of Honolulu
650 S. King Street, 3rd Floor
Honolulu, Hawaii 96813

Dear Mr. Sappal:

The citizens of this county may breathe a collective sigh of relief. After more than thirty years of having no consensus, no plans and no money we now have the full support of both the Governor and the Mayor plus financial backing from the legislature for the Honolulu Rapid Transit Development project.

This is indeed an historic milestone in meeting the transportation needs of Honolulu in the next decade. I fully support this project and congratulate you all for your efforts.

Whatever alignments are chosen, one of the key factors is that there must be abundant free public parking in the park and ride lots and frequently scheduled bus feeder systems. Without this, fixed guideway will not necessarily be an attractive alternative to commuters and tourists whose first preference is to drive.

It is always more convenient to simply get into one's car and drive directly to your destination. Many commuters will be driving to the park and ride facilities, then perhaps have to walk or catch a bus before arriving at their final destination. This may still save ten minutes, but will be less "convenient" than simply traveling in the privacy of one's car.

Having free parking in lieu of paying expensive parking fees in Downtown would be just the incentive needed to encourage some commuters to use the fixed guideway.

Thank you for your consideration of these thoughts on the matter and again, congratulations.

Yours sincerely,

MURRAY G. BAWDEN
President

707 Richards Street • Suite 400 • Honolulu, Hawaii 96813 • Telephone (808) 521-7861 • Telex 7421913
May 22, 1990

Mr. Joseph M. Magaldi, Jr.
Deputy Director
Department of Transportation Services
City and County of Honolulu
650 S. King Street, 3rd Floor
Honolulu, Hawaii 96813

Attention: Mr. Robert Sumitomo

RE: Potential Impact of Proposed Fixed Guideway Alignment
on TMK 2-1-49:66, 777 Kapiolani Boulevard, Honolulu, Hawaii

Dear Mr. Magaldi:

As lessee of the subject property, I wish to go
on record as strongly objecting to the location of your fixed
guideway surface portal in the vicinity of Kapiolani Boulevard
and Dreier Street. As seen on the attached drawing provided
by your staff, the implementation of your plan will affect
our entire property thereby causing us considerable hardship.

As you know the properties fronting Kapiolani Boulevard
have become the premier location for major office and condominium
developments in Honolulu, with values exceeding $400 per square
foot. We too have plans for a major redevelopment project
for our site comprising 1.63 acres but your plan for the surface
portal has completely undermined our efforts. In view of
the foregoing, we respectfully request your reconsideration
of the portal location perhaps within a public right-of-way
such as Waimanu Street or on lands presently owned by the
City or State government.

In closing I wish to mention that we support rapid
transit in dealing with our transportation problem in Honolulu.
Nevertheless we feel that the burden imposed on a single piece
of property such as ours is so great that we are compelled
to write to you to advise you of our very strong objection.
Mr. Joseph M. Magaldi, Jr.
May 22, 1990
Page Two

Your attention to this request is most sincerely appreciated. Should there be any questions, please contact James Romig who can be reached at 524-3966 or myself.

Sincerely,

[Signature]

James C. Reynolds

JCR/ks
Good evening. Before I begin, I would like to commend the DTS for their continued hard work in bringing us as close as we are now to the realization of fixed guideway transit on Oahu.

I appreciate the opportunity to speak with you regarding the mobility crisis we have here on Oahu. We are one of only a handful of cities in the United States with such high levels of traffic congestion. This traffic problem affects us every day as permanent residents, and it affects our tourists as well. And it is going to get much worse before we will be able to implement any major solutions.

During this decade, the number of residents on Oahu will grow from 850,000 to way over a million. The Visitors Bureau predicts that during this same decade the number of tourists will grow from our current 8 million to over 11 million. The fact is, over 70,000 vehicles are registered each year and this will keep increasing each year.

Our roadways cannot handle the current volume of traffic, and even if we wanted to, we could not add roads fast enough to
keep up with this level of growth. Our problems in finding environmentally acceptable, non-controversial alignments for new highways, let alone the cost of right-of-way and construction, serve as major impediments to the construction of any more new major highways or freeways on Oahu.

Our bus system has done an admirable job of meeting the mobility needs of many our residents. On a per capita basis, our bus ridership is one of the highest in the country and for that we can be proud. Unfortunately, buses add to surface congestion and compete with the automobile for valuable road space. Bus travel times are only going to get worse, which greatly limits their ability to attract more riders.

Automobiles and buses contribute to air and noise pollution, smog and congestion. Both detract from the quality of life on Oahu. The prospect of more cars and more buses on our roadways is not a pleasant one.

I wish we could stand here tonight and tell you that we have the solution to the mobility crisis, but honestly, there is not one solution to this massive problem. There are many elements to the solution, including more carpools and van pools, flexible work hours, "flex time", alternative fuels for automobiles that are non-polluting, and the continued adoption of ordinances to help focus growth in a comprehensive manner.
A major component of the solution is fixed guideway transit, or transit that operates on a fixed guideway, especially a monorail system. It is time we "bite the bullet" and install a fixed guideway transit system as part of the overall solution for our island.

It is better to do it now because the congestion problem, and the closely related issues of air and noise pollution, will not wait for us to play "catch up". And the longer we wait, the more expensive the ultimate system will be, and the more difficult it will be to retrofit the system into such an intensely developed community such as Honolulu.

As the mainline transit system becomes more expensive, we will not be able to afford as many miles of system. The fewer miles of mainline transit that are built translate to fewer residents that can be served. The fewer residents served, the fewer cars removed from the road.

We need to begin now to plan and build our new lower cost residential communities, which, in conjunction with the transit system, are being located further and further from the central city.

Fixed guideway transit systems like monorail offer many advantages. These include non-polluting, electric propulsion which is much more energy efficient on a per passenger carried
basis than any other form of transit, and the ability to travel over the traffic congestion without delay.

I cannot promise you that fixed guideway transit will not take all of the automobiles off of the road. However, if recent experience in other cities is any indication, as many as 50 percent or more of the trips destined for major activity centers can and will use the system, thereby alleviating some of the congestion and keeping us from having to add so many new roadways. One fixed guideway transit line can carry as many passengers as over 20,000 automobiles per hour in each direction, equivalent to over twelve freeway lanes in each direction.

And, with the fixed guideway transit system augmenting buses for the longer distance trips, fewer buses will be occupying the freeways and downtown streets. Many buses can be returned to the role best suited for them: collecting passengers in neighborhoods and other outlying suburban areas and taking them to the mainline transit system, away from the congested roadways.

The RIGHT fixed guideway transit system installed in the RIGHT corridor will add to the quality of life on Oahu. In fact, it has been proven in many North American cities that fixed guideway transit systems can gradually create a more efficient urban form. High density residential, hotel, office, and commercial properties will be motivated to locate around the
mainline transit stations (where appropriate) because there is a
direct, positive correspondence between the value of property and
its proximity to a modern, attractive, guideway transit system.

This creates a lifestyle for the residents and users of these
mixed-use developments whereby an automobile is not necessary
for most trips. Work, shopping and entertainment all become
within easy reach of the mainline transit system.

Of course, people cannot immediately be expected to transfer
their allegiance from the automobile. People all over the world,
not just here, have a "love affair" with the automobile. This
dictates that if the transit system is to be successful, it must be
safe, reliable, convenient, and much more than just a ride. It
must be attractive. It should be fun. And, the trains must
operate frequently and the schedule of our bus system must be
integrated with the monorail system to encourage safe and easy
transfers.

My company, TGI, and our parent company, Bombardier, have
been in the transit business for over 16 years. Our company is
the largest provider of mass transit vehicles in North America
and we offer a wide variety of fixed guideway transit systems.

For Oahu, we agree with the City and County in their
recommendation of an elevated fixed guideway transit system. I
am happy to say that an elevated transit system does not have
to be a wide and unsightly roadway in the sky. In the case of the monorail offered by our company, the guideway can be as narrow as 26 inches in width. Aside from offering the many advantages of fixed guideway transit just mentioned, the electrically powered monorail is the most aesthetically pleasing transit system in the world due to its narrow guideway and attractive vehicle design.

Quiet rubber-tired monorail vehicles can operate about 20 feet above the ground in most areas, above the congestion and traffic, linking Waikiki with Pearl Ridge, downtown Honolulu to the residential areas, and Aloha Stadium to the University.

We are excited about the prospect of fixed guideway transit on Oahu and even more excited about the prospect of possibly the M Series monorail being selected because it is THE RIGHT technology for Oahu.

A monorail system on Oahu can be a system we can all literally live with in an environmental sense and one that will add to rather than detract from the quality of life on Oahu. The monorail system can be tailored to match the unique nature of our city, and we are convinced it will be successful.

You know, throughout the history of this country, whenever we have been on the brink of major decisions to improve our cities for our children and their children, there have been a few people
who have tried to force us to stay in the past. But I suggest that we already have proved that the transportation system of the past has reached its limits, and now is the time to build the transportation system for our, and their, future.
7.0 PRIVATE CITIZENS

As a Great Valley resident, I do not want any radium
nuke system on the local black

Pilgrim Creek, Stoneham, Mass., will never accept
the underground waste treatment other than rail.

![Postcard Image]

America the Beautiful USA 15
May 13, 1990

Mr. Amar Sappal, Prof. Hono.
Dept. of Transportation Sciences
650 South King St 5th Floor
Honolulu, Hi 96813

I am a Fort Shafter resident and a Hawaii resident since 1976. I want to express my views on the proposed mass transit system. I am not in favor of it as proposed. I am strongly opposed to a feeder elevated line on Salt Lake Blvd. I feel a revised bus system with designated drive-in-and-park pickup points is much more cost-effective and can be implemented and tested quickly.

What I propose is express buses running parallel to the mountain with small feeder buses running parallel to the express buses—feeding them. Express buses can be set up and used for speed.

Salt Lake Blvd is not a good idea for reasons of all the negative impact on communities with all the negative impact on communities with congestion, lack of parking, noise, space, etc. We are already in a severe situation, already with these conditions. My main concern is daytime parking of Radford. My main concern is the parking of Sand Island and Bay Area students. Parking is a real problem.

Sincerely,
Larry Anderson
May 21, 1990

Joseph Magaldi, Mass Transit Director
Honolulu Hale
500 S. King St.
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

I strongly support the proposed mass transit.

We live in Kulicuou and drive to work every morning. The traffic on the freeway is fully congested and I see no relief is sight from improvements to the freeway. The only thing that will improve traffic for those of us in east Oahu is some form of mass transit to take vehicles off of the freeway and relieve the current congestion.

Sincerely,

Al Andrews

May 21, 1990

Mr. Joseph Magalini
Director of Transportation Services
Honolulu Municipal Building
Honolulu, Hawaii, 96813

Dear Mr. Magalini,

I fully support the city's mass transit plan and want you to know that my neighbors and I look forward to the start of construction. Frankly, I am sick and tired of spending better than two hours a day languishing in traffic. With the construction planned for Ewa and Central Oahu, traffic won't get any better.

Please let the decision makers know how important it is that we get the city's plans moving now.

Sincerely,

Emily Cepel
May 21, 1990

Mr. Joseph M. Magaldi, Jr.
Deputy Director
Department of Transportation Services
City & County of Honolulu
650 South King Street - 3rd Floor
Honolulu, Hawaii 96813

Attention: Julie Tavares

Dear Mr. Magaldi:

I support the City's Rapid Transit Plan and your department's efforts to develop railed mass transit contained within that plan.

Sincerely,

[Signature]

Name: Ruth M. Baldori
Address: 94-343 Olipua Place
City: Waipahu, HI 96797
Mr. & Mrs. F. F. Beattie
4357 Olaioa St.
Honolulu, HI 96813

May 16, 1990

Mr. Anan Sappel, Project Manager
Dept. of Transportation Services
650 South King St., 3rd Floor
Honolulu, HI 96813

Dear Mr. Sappel:

We have been Foster Village residents since 1969. We strongly oppose the Salt Lake Blvd. mass transit alignment.

Salt Lake Blvd. is bordered by many family residential areas, 4 schools and a Navy child-care center. It is not a wide road and construction work would be very close to the residential areas and schools.

The high level of noise and dust is likely to cause great distress and other problems for the residents and schools.

Constant noise will certainly hinder successful teaching and learning. The dust might trigger respiratory distress in children and adults. Traffic congestion and parking problems are also likely.

For these reasons we support the Kam Highway route for mass transit. Kam Highway is very wide and can easily accommodate a mass transit system plus a vehicle roadway without the problems of the Salt Lake route.

Yours truly,

F. F. Beattie

Mr. & Mrs. F. F. Beattie
May 20, 1990

Dear Mr. Sappel:

I urge you to support the Kamehameha Hwy route for a mass transit route. It is a more commercial route and would have less impact of traffic congestion, and affect on the learning process in at least three schools.

Sincerely,

Mary L. Bell
1526 Ukele St
Honolulu 96818
May 23, 1990

Mr. Joseph Magaldi, Deputy Director
Department of Transportation Services
City & County of Honolulu
Honolulu, Hawaii 96813

Dear Mr. Magaldi,

Mass transit will reduce commute time, encourage people to leave their cars at home, reduce environmental pollution and spur growth along the mass transit corridor. It will also lessen our dependence on foreign oil.

I don't mind paying another one-half percent excise tax to build our mass transit line. Overall, it would be cheaper.

Sincerely,

Delfinita C. Benitez
May 21, 1990

Mr. Joe Magaldi
City and County of Honolulu
Honolulu, Hawaii

Dear Mr. Magaldi,

I just wanted to let you know that I fully support the people of Honolulu's mandate to have mass transit NOW! Please let me know what I can do to convince the legislators about what the people want (names and addresses).

Thank you.

Sincerely yours,

Maria Bermundo
MARIA BERMUNDO

PO Box 37635, Honolulu, Hawaii 96835
May 22, 1990

Mr. Joseph Magaldi
Deputy Director
Department of Transportation Services
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

I am writing to tell you of my agreement in supporting the City and County's rapid transit plan.

I, personally, do not agree that adding on more busses or even a ferry system will solve our problems. I also think the majority of people in Honolulu will enjoy the convenience of riding the rapid transit system.

It seems to me that we have conducted enough research on the environmental aspects as well as the planning of the route the transit system will take.

Aloha,

[Signature]

[Name]
May 24, 1990

Amar Sappal
Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Re: Fixed Rail System

Dear Mr. Sappal:

It has come to my attention that one of the proposed stations for a fixed rail system would be at the intersection of Bougainville Drive and Salt Lake Blvd. with no planned parking. As an ex-resident of Miami Florida during the time their fixed rail system was built and operating, I can tell you that people won't use the station if there is no easy way to gain access; ie parking facilities. The stadium area would provide such accommodations and would therefore be the better choice of station location.

Another comment from my knowledge of the fixed rail system in Miami, is that the public there did not use the system because it did not provide easy access between home and work. People are not willing to walk very far, not to mention carrying packages, to use a transit system. If a fixed rail system does not provide a better alternative to the consumer it will not be used, and moneys would be better spent on expanding the Bus System or elevated highways such as the viaduct.

Very truly yours,

T.R. Bongart
4309 Palahinu PL
Honolulu, Hawaii 96818
422-1311, 945-3033 (W)
Alaska to Joe McMillin

Just a note to let you know that since 1956 when I came to the beautiful Island to live that every year & more so around election time, the muscle on all hands of our government start talking about the transportation system & landing big bucks on surveys, studies & everything but getting a Rapid Transit Type Transit system in place. We would all (those who drive, those who don't) like to see a system working before we die. Having talked to many people in many other areas & indeed it seems that most need a fast transit system. The fastest potable rail system around the Island with ferry on small & Van Type Transportation from city to the town & working areas - finally publicly funded or taxes, a Transit Service, to knowingly take on or free moves between rail & ferry, you could go down in history as a great & successful leader if you can get us a hybrid system, not buses & no cheap fixes.
May 22/90

Dear Mr. Lazard

I don't know if an Elevated Mass Transit System would solve any of our traffic problems or not.

What I do know is that I do not want it in my front yard. My street looks, in front of college runs parallel with Salt Lake B. We do not need any further noise in the neighborhood. Depending on atmospheric conditions, the elevated freeway runs Salt Lake B at Stadium Mall sounds like a freight train.

Please spare our already our crude Salt Lake Blvd. and keep any elevated transit system out of our residential neighborhood.

Sincerely,

Ruth Boyett

Ruth A. Boyett
4338 Laster St.
Bountiful, UT 84011
May 21, 1990

Mr. Joseph Magaldi
Coordinator
Mass Transit Railway Project

Dear Mr. Magaldi,

Please let me know how I can help to open the eyes of our legislators and give the people of Honolulu what they want and deserve -- an efficient mass transit system.

Salamat po!

Sincerely,

Klaylah Burchett

PO Box 1142
Waialua Hawaii 96791
May 21, 1990

Mr. Joseph M. Magaldi Jr.
Deputy Director
Department of Transportation Service
650 S. King Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

I am writing to express my support for the proposed rapid transit system currently being developed for the City and County of Honolulu. As a long-time resident of Oahu, I have seen traffic go from bad to worse.

It is my belief that a rapid transit system will help to alleviate what has become one of the most frustrating aspects of life in Honolulu. I hope that plans will proceed with utmost speed.

Sincerely,

[Signature]

30 MAY 93 P 1: 23
RECEIVED
Joseph W. Cabrinha  
4260 Halupa Street  
Honolulu, HI 96818  
May 23, 1990

Mr. Joe Magaldi  
Deputy Director  
Department of Transportation  
City & County of Honolulu  
650 South King Street  
Honolulu, HI 96813

Dear Mr. Magaldi,

The purpose of this letter is to express my fullest support for the Rapid Rail system under consideration by your department as an alternative to solving our traffic problems. The time for action is now. The efforts of your department support this need.

Please express my appreciation to your staff for the work they have done - and will continue to do - to make Honolulu a better place.

Sincerely,

[Signature]

JOSEPH W. CABRINHA
Mr. Amar Sappal  
Project Manager  
Rapid Transit Development Division  
Department of Transportation  
650 South King Street  
Honolulu, HI 96813

Dear Mr. Sappal,

As a resident of Foster Heights Villas, I am against having the Rapid Transit route down Salt Lake Boulevard. I am in favor of the Kamehameha Highway route.

[Signature]  
5-15-90  
Resident Name  
Date

[Signature]  
Resident Name

[Signature]  
Resident Address
May 7, 1990

Mr. Amar Sappal
Project Manager
Rapid Transit Development Division
Department of Transportation Services
690 South King Street
Honolulu, HI 96813

Dear Mr. Sappal,

I am against having the Rapid Transit route down Salt Lake Boulevard.

My husband and I purchased our townhome in Foster Heights Villas a year ago. Our unit is in the building that is on the corner of the intersection of Salt Lake Boulevard and Bouganville. This is a very busy and noisy intersection, but we decided that we could put up with this constant noise because the location is very convenient for us. Our daughter attends Radford High School and my husband is the Girls Basketball coach there.

If the Rapid Transit terminal is built in front of our home, the amount of noise would increase so much that it would be intolerable. As it is now, we have to sleep with our upstairs windows closed at night. If the terminal is built here, people would be coming through our parking lot to drop off and pick up riders. They may even attempt to use our lot as a Park-and-Ride facility, figuring that the empty stalls belong to people who have gone to work and will be gone all day. The only on-street parking in this area is on Bouganville and a lot of residents and tenants at Foster Heights Villas already use this for parking.

We don’t want a wall built to try to combat the noise problem because it would have to be as high as the rail system-twenty to twenty-five feet! That would make us feel like we were in a prison. Who wants to look out their door or window and see a twenty foot concrete wall? (Not to mention the ugly view we’d have of the rail system.) It would also block the nice,
cool trade winds we currently enjoy and make it extremely hot
in our unit.

The Kamehameha Highway route is really a much better choice.
There's more room—a park-and-ride facility could be built
there. The military housing in that area is far enough away
from the route that the noise will not bother those residents.
Pearl Harbor probably employs more people in this state than
any other employer, so this route would be much more convenient
for them. Pearl Harbor employees will not use Rapid Transit
if they have to disembark on Salt Lake Boulevard and walk to
the Pearl Harbor gate. And why provide a shuttle for them when
the system can have a terminal right at the Pearl Harbor gate?

I agree that something needs to be done to alleviate the traffic
congestion on Hawaii's roads. But the solution is not to put a
rail-transit system through a residential area. A residential
area is where people live, in their homes, away from the hustle
and bustle of their jobs and commercial areas. People don't
want trains running through their neighborhoods.

My husband and I will be at the public informational meeting
at Aliamanu Elementary School on Wednesday to voice our objection
to putting the Rapid Transit System down Salt Lake Boulevard.
We favor the Kamehameha Highway route.

Sincerely,

Sherry Cadwell
4280 Salt Lake Blvd. #C12
Honolulu, HI 96818
It will seek input on routes and whether a rail system is best.

By Ken Andrade

The city's rail-transit team is gearing up for federally mandated public hearings next week to help them sound out public sentiment on various routes and other aspects of the proposed billion-dollar project.

Although the city's Rapid Transit Development Division scheduled one more informational meeting on the project at 7 p.m. today at Aliamanu Intermediate School, the public hearings next week will be different, with planners seeking reaction to the proposal.

"Basically, that is a one-way mode, in which we just listen," said division spokesman Tony DePaul. "We can then evaluate the public's comments and input, so that the city administration can make its selection."

The hearings are set for Tuesday at the state Capitol auditorium and Wednesday at Aliamanu Intermediate School, both at 7 p.m.

The division also will accept written testimony until May 21.

The route can be any aspect of the project, including whether there should be a rail system at all, but city planners are especially interested in residents' routing preferences for a rail system.

The 30-page "Alternatives Analysis and Draft Environmental Impact Statement," released in March, covers 11 versions, including two that call for no rail system at all.

The nine rail system alternatives include two routes from Aloha Stadium to Kapolei — via Kamakaneha Highway past Honolulu Airport and along Salt Lake Boulevard — and three routes through downtown — via Nimitz Highway, Beretania Street or a tunnel beneath Kapiolani Boulevard.

The city Department of Transportation Services already has a route recommendation of its own, according to an April 12 letter to City Council, which also will have a say in selecting "locally preferred alternatives" for the system.

The "staff recommended alternative" route follows Kamehameha Highway rather than Salt Lake Boulevard in the downtown area.

Once downtown, the route tunnels beneath Hotel Street, the walkway between the state Capitol and Iolani Palace, the entrance to the Honolulu Municipal Building and part of Kapiolani Boulevard before surfacing at Drier and Waimauoli streets.

Amar Sapal, the city's rapid-transit administrator, said the staff recommendation is based solely on technical analysis by consultant Parsons Brinkerhoff Quade & Douglas and remains subject to modification based on public reaction.

Some reaction is expected over the recommendation of Kamehameha Highway over Salt Lake Boulevard, he said. That would take the rail line about a mile from the residential community of Salt Lake, which in 1985 had a population of more than 38,000.

But Sapol said city staffers concluded that "available stations along Salt Lake Boulevard are still enough from a ridership point of view." He said Salt Lake Boulevard has "not been considered as a major concern."
Public Hearing Testimony
Regarding Rapid Transit for Honolulu
submitted to the City and County of Honolulu
by Dennis Callan, speaking as an individual
May 8, 1990

First of all I would like to offer my congratulations to all those involved in the development and support of rapid transit for Honolulu, starting with the city administration and the Rapid Transit Development Section, and most recently the State Legislature and Governor for their funding support which will turn rapid transit into a reality. Most of all congratulations are due to our mayor, Frank Fasi, for his determination to educate the skeptics and build this system.

These are not mere platitudes that roll easily off my lips, for I was one of those who strongly opposed rapid transit for a variety of reasons over the past fifteen years. I even produced a major television documentary that was broadcast on all our local channels 12 years ago presenting many arguments against the old HART heavy rail proposal, and as chairman of the OMPO CAC I lobbied against the old HART. Even today, many of those anti-rail arguments are still valid, but I have come to feel, like most everyone else, our traffic is getting so bad we have got to take this step. So, OK, we need a rail system, but let's make sure we build the best possible system, which is why we're here tonight. Thank you for this opportunity to speak.
However, now you have many more problems to consider which I would like to discuss.

Concerning route alignment, there seem to be several basic questions: regarding the Salt Lake versus airport, I would tend to favor the airport, but only if it can be made easily accessible to the tourist, who should be charged extra for the airport station. And since the airport is going to spend 1/2 billion dollars for their own rail system they should be able to interface.

Let me underline should for a moment, to add one of my biggest concerns in this whole matter: the system should work, but Murphy’s Law is going to be hanging over your heads at every turn. Look, the city can hardly manage the bus system, which today is on the verge of anarchy. How are they going to pull this off? I seriously doubt it. You had better rely heavily on mainland and international expertise in planning, building, and managing this system. Otherwise we’ll probably have another planning disaster, just like much of the rest of the city planning anarchy we have seen over the decades.

Back to route alignments, the other big question seems to be downtown, but there can be only one choice for that, which is a Hotel Street subway. Only such a central location will be prattical to serve all downtown workers, and if the Central Business District is not served in the best possible way, the whole system will fail. Forget about Beretania Street, and don’t worry about the extra hundred million it might cost. If you build the cheapest possible system, that’s just what you’ll get.

You will also need to spend some extra money at the stations to make them accessible, and I’m not talking about the handicapped, but about the rest of us who are healthy but lazy: we need escalators! For those less lazy you should provide lots of bike racks. Even though we have no tradition of bicycling for the masses, it really will
be a great way to get to the urban stations. You might
even consider bus ramps to get passengers into the easiest
possible transfer situation, since objections to transferring
is going to be one of your biggest problems.

As far as the two spurs into Waikiki and to the University,
I'm all for it, but I really think the end terminus should
be in Waialae-Kahala, to service feeder busses from the
east and relieve that horrendous congestion. You seem
to be willing to take care of the west end extension into
the suburbs--why not the east?

Now let me turn to the financial picture. I
am most concerned about the concept of value capture, and
making sure that the increased property values created
by this system flows right back to the government to help
pay for it. Your plans for Special Assessments become the
key to this and I want to see that element emphasized.

But what about the huge increase in value for the
Campbell Estate? This train is pointing right at their
vast holdings in Ewa, which are presently handicapped by
the traffic problems from that side. Once commuters can
easily get into town, their land values will explode, and
we should be getting some of that increase back to the
government. Campbell should be made to pay their fair
share, and so should the Central Oahu landholders, during
this phase--not just some day when the actual tracks are
extended into their communities. Why should the taxpayers
build a system to benefit a few rich landowners? Make
them pay. That goes all the way down the line, for example
at a place like Ala Moana Shopping Center—you should make
them pay through the nose for this system, which is going
to bring them millions of customers on a conveyor belt.

I really doubt that this government is capable of
such measures, since the politicians are already so indebted
to these big financial interests. So maybe it is better
if you just go ahead and sell off the rights to build it to some private conglomerate who would do the bulk of the developments around the stations themselves, and in the process pay for most of the system.

Let me conclude with a note about technology. You could play it safe and go for off-the-shelf established technology, but I would suggest you be a little daring and get something that will anticipate the next century... magnetic levitation. This would provide the smoothest quietest ride, to enable construction of high density housing near the transit line, which after all, is going to be one of the main consequences of building such a system.

So I urge you to build it, but build it the right way!
May 22, 1990

Mr. Joseph Magaldi
Deputy Director
Department of Transportation Services
City and County of Honolulu
650 South Beretania Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

In view of the on-going and ever increasing traffic problems something must be done. In my opinion, a mass transit system just may be the answer for us. Therefore, I support the City's plans for a mass transit system.

Sincerely,

Cheryl Campbell
Mrs. Cheryl Campbell
EMILIO CANENCIA
2309 AUMAKUA STREET
PEARL CITY, HAWAII 96782

May 21, 1990

Mr. Joseph Magaldi
Deputy Director
Department of Transportation Services
City and County of Honolulu
650 South Beretania Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

I live in Pearl City and over the years, we have seen the traffic build up as more and more people are moving to the Leeward area. With the development of West Loch and Kumu Iki in addition to Mililani, traffic problems will only increase if the City doesn't do anything about it. I therefore support the City's Mass Transit plans.

Sincerely,

[Signature]

EMILIO CANENCIA
May 22, 1990

Mr. Joseph Magaldi, Jr.
Department of Transportation Services
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

I am writing this letter to let you know that I support the City's Rapid Transit plan.

I feel that this should have been done years ago, like the East Coast has done. It will also benefit our environment, (less exhaust—no smog), and also alleviate the traffic and parking problems that are growing worse everyday. The bus system is obviously not working well.

Thank you for taking the time to read this.

Sincerely,

[Signature]

[Name]
May 22, 1990

Daniel Chock
1145 Kalauipo Place
Pearl City, Hawaii
96782

Joseph Magaldi, Deputy Director
Department of Transportation Services
650 S. King St.
Honolulu, Hi 96813

Dear Mr. Magaldi,

I fully support the City's efforts to bring mass transit to Honolulu. This island already has too many cars. The air pollution and traffic congestion during morning and afternoon rush hours are already barely tolerable. Conditions will only get worse unless something is done now to find a way to get people to and from their work places without their cars. A good mass transit system will do that. I hope that the City will be able to get a system going soon.

Aloha,

[Signature]

Daniel Chock
May 21, 1990

Mr. Joseph Magaldi  
Department of Transportation Services  
650 South King Street  
Honolulu, HI 96813

Dear Mr. Magaldi:

My patience is at an end. It's obvious to me, my family and my friends that a commuter train has to be built in Honolulu. Ever since I read about HART in a brochure in the 1970s, I've been excited about its operation here.

I've seen transit systems operate successfully around the world, even in what we consider to be Third World countries. If they can do it, why can't we? Time and the rest of the world are passing Honolulu by.

I'm all for building HART before we get total chaos on our streets.

Yours sincerely,

Elsie K. Choy  
876 Curtis St. #2105  
Honolulu, HI 96813
Rapid Transit Development
720 Kapiolani Blvd.
Honolulu, HI 96813

To Whom It May Concern:

The proposed 14 mile fixed rail system covers but a small corridor of our island, does not begin to address the problem of too many people and too many cars. It does not solve the traffic problems from Windward Oahu, Hawaii Kai and cross-town traffic, which is really dreadful. We already have busses and express buses from the areas to be serviced by fixed rail, so what assurance is there that people will change their lifestyle and use fixed rail instead of hopping in their cars?

The cost of this system is another factor: we will all be paying for this forever since no fixed rail system in the country is self-paying, and ridership is usually overestimated.

A more efficient system of moving traffic would be helpful. How about really synchronized lights along major routes and cross-town corridors; some well-placed overpasses – Castle Junction on Pali Hwy. for Kaneohe traffic- Likelike and School Sts... weren't these all proposals in a traffic study done a few years ago? They sounded good then and still do. The "sensor" lights have certainly helped when they don't mal-function. Perhaps more express buses during peak hours – they seem to be filled to capacity. None of these proposals would cost billions of dollars either.

Sorry, the proposed fixed rail system is no panacea to our traffic problems and is much too costly for the limited area serviced.

Sincerely yours,

(Mrs) Anneliese Chun
259 Kaelepulu Dr.
Kailua, HI 96734
May 4, 1990

Thank you for soliciting people's opinions.
May 21, 1990

Mr. Joseph Magaldi, Deputy Director  
Department of Transportation Services  
City and County of Honolulu  
650 S. King Street  
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

I strongly urge the City and County of Honolulu to implement its Rapid Transit Plan. It is long overdue and necessary for the future of our City.

The recent approvals from federal officials and support from the recently adjourned State Legislature indicate that we must proceed as quickly as possible. I applaud the City Administrations efforts to see this issue through.

While your initial plans do not include Kalanianaole Highway to Hawaii Kai, any effort to relieve traffic along any of our major traffic corridors is needed. All my neighbors agree that something must be done as soon as possible.

Thank you.

Sincerely,

[Signature]

5307L Kalanianaole Hwy  
Honolulu, Hawaii 96821
May 10, 1990

Mr. Joe Magaldi  
Deputy Director  
Department of Transportation Services  
650 S. King, 3rd Floor  
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

Having just learned of the proposed fixed rail transit from the airport to Waikiki, I felt compelled to voice my opinion.

GOODGODALMIGHTY!!!! First two convention centers, then rapid transit, now fixed rail transit . . . if the intent is to turn Oahu into another San Francisco or Los Angeles, then it's a great idea. If, however, Hawaii wishes to remain the tropical paradise that it once was (which, after all, is what attracts tourists in the first place), then please, no more!! Aside from the obvious disadvantages, i.e., streets torn up, construction noise and pollution (for what, five years, ten years?), keep in mind that no matter what the "estimated cost" is now, construction projects of this magnitude historically tend to overrun by at least 100%.

I live in Waikiki, and the thought of what lies ahead is giving me nightmares. I imagine when word gets out to the mainland about what's going to be happening in Waikiki over the next several years, tourism will take a nosedive also. For the life of me, I cannot see the reasoning behind this building and transportation frenzy. More buses? Sure! LA West? NO!

Alas, poor Honolulu, I knew her when . . .

Sincerely disgusted,

Maureen Colby  
1905 Ala Wai Blvd. #804  
Honolulu, HI 96815

cc: Honolulu City Council
ATTENTION FOSTER VILLAGE RESIDENTS

On May 9, 1990 a hearing was conducted at Aliamanu Intermediate School on mass transit. Much of the testimony centered on the proposed fixed transit choices of a Salt Lake Blvd. route versus a route along Kam Highway past the Arizona Memorial, military bases, and airport.

The chairman of our Neighborhood Board 18 testified in favor of a Salt Lake Blvd. route. The presidents of both community associations testified in favor of mass transit with the FVCA president supporting the Kam Highway route, and the EFVCA president supporting either route.

YOU SHOULD BECOME AWARE OF THE IMPACT AN ELEVATED MASS TRANSIT SYSTEM WOULD HAVE ON FOSTER VILLAGE.

1. NOISE: Noise impact was acknowledged to be substantial; a sound barrier will be necessary. Picture the barrier, hear the dull roar, and consider how it will impact our schools and quiet village. With winds shifting to a Kona direction, the entire village may be subjected to this noise.

2. TRAFFIC CONGESTION: The proposed station will be at the corner of Bougainville Dr. and Salt Lake Blvd.; no parking is planned. Consider the current traffic congestion and visualize the added traffic of possible transit riders searching the neighborhood for parking spaces or others dropping off family members at the station. Exit time from the Village will be increased.

3. IMPACT ON SCHOOLS: Consider the impact of construction on Maka'ikapa Elementary School, Radford High School, and Aliamanu School.

THE DEADLINE TO SUBMIT WRITTEN TESTIMONY IS 4:30 PM, MAY 23, 1990.

ADDRESS YOUR TESTIMONY TO: MR. ANAR SAPPAL, PROJECT MANAGER
DEPARTMENT OF TRANSPORTATION SERVICES
650 SOUTH KING STREET, 3rd FLOOR
HONOLULU, HAWAII 96813

PLEASE WRITE TO MR. SAPPAL, EVEN IF IT IS ONLY A NOTE, TO SUPPORT A KAM HIGHWAY ROUTE, OR NO MASS TRANSIT AT ALL. ASK THAT OTHER ALTERNATIVES BE CONSIDERED, SUCH AS TAX INCENTIVES TO BUSINESSES TO MOVE TO OUT-LYING AREAS OR THE LEGALIZATION OF JITNEY OR OTHER SMALL TRANSPORTATION SERVICES. THE LAST EIGHT MASS TRANSIT SYSTEMS BUILT WERE FAILURES; IT IS YOUR MONEY AND YOUR NEIGHBORHOOD.

[Handwritten note]

Mr. Sappal: Mass Transit?!! In Foster Village....

[Signature] Janice W. Peschaer
A F.V. Resident since 1968.

[Signature] Charles W. Cote
Foster Village Res.
CORRECTION

THE PRECEDING DOCUMENT(S) HAS BEEN REPHOTOGRAPHED TO ASSURE LEGIBILITY
SEE FRAME(S) IMMEDIATELY FOLLOWING
ATTENTION FOSTER VILLAGE RESIDENTS

On May 9, 1990 a hearing was conducted at Aliamanu Intermediate School on mass transit. Much of the testimony centered on the proposed fixed transit choices of a Salt Lake Blvd. route versus a route along Kam Highway past the Arizona Memorial, military bases, and airport.

The chairman of our Neighborhood Board 18 testified in favor of a Salt Lake Blvd. route. The presidents of both community associations testified in favor of mass transit with the FVCA president supporting the Kam Highway route, and the EFVCA president supporting either route.

YOU SHOULD BECOME AWARE OF THE IMPACT AN ELEVATED MASS TRANSIT SYSTEM WOULD HAVE ON FOSTER VILLAGE.

1. NOISE: Noise impact was acknowledged to be substantial; a sound barrier will be necessary. Picture the barrier, hear the dull roar, and consider how it will impact our schools and quiet village. With winds shifting to a Kona direction, the entire village may be subjected to this noise.

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ADDRESS YOUR TESTIMONY TO: MR. ANAR SAPPAL, PROJECT MANAGER
DEPARTMENT OF TRANSPORTATION SERVICES
650 SOUTH KING STREET, 3rd FLOOR
HONOLULU, HAWAII 96813

PLEASE WRITE TO MR. SAPPAL, EVEN IF IT IS ONLY A NOTE, TO SUPPORT A KAM HIGHWAY ROUTE, OR NO MASS TRANSIT AT ALL. ASK THAT OTHER ALTERNATIVES BE CONSIDERED, SUCH AS TAX INCENTIVES TO BUSINESSES TO MOVE TO OUT- LYING AREAS OR THE LEGALIZATION OF JITNEY OR OTHER SMALL TRANSPORTATION SERVICES. THE LAST EIGHT MASS TRANSIT SYSTEMS BUILT WERE FAILURES: IT IS YOUR MONEY AND YOUR NEIGHBORHOOD.

Ms. Sappal. I think it makes sense.

Janice W. Pechauer
A. F. V. Resident since 1968.

Mr. Sappal... I'm for the Village.

Janice W. Pechauer

Charles D. Cote
FOSTER VILLAGE RESIDENT
Mr. Joe Magaldi  
Deputy Director  
Department of Transportation Services  
650 South King Street  
Honolulu, Hawaii 96813  

Dear Mr. Magaldi:

I was born and raised on Oahu and presently attend the University of Hawaii. I want to live and work here after graduation but I'm concerned about the high costs and traffic congestion.

A rapid transit system like the one they have in San Francisco would be great for Oahu. Several of my family who live in the Bay Area use the BART to get to work. This is what we need and we need it now, not decades from now when it will take twice as long to get anywhere by car.

As far as I'm concerned, you either pay now or you pay later.

Sincerely,

Lisa Costa  
2108 Oahu Avenue  
Honolulu, Hawaii 96822
May 22, 1990

Mr. Joseph M. Magaldi, Jr.,
Deputy Director
Department of Transportation Services
650 South King Street
Honolulu, Hawaii 96812

Dear Mr. Magaldi,

I would like to take this opportunity to express my support for the rapid transit proposal by the City and County.

As one who is aware that many citizens are forced by your inadequate service to stand for up to two hours (in a packed bus that stops at every corner) while seeking to get from their rural homes to school or work, it is obvious that any alternative would be an improvement.

Sincerely,

[Signature]
Mr. Joseph P. Magaldi
Dear Mr. Magdeli,

I understand the urgent request for

the Wind and Ski to Whalers'

to Whalers'. I suggest the red for

urgent transit and black in the future.

The Wind and Ski will be included.

We had a traffic problem on the A/C

side for which there is no other long

term solution.

Buddy Cottrell

1517 Whalers'

Kauai, HI 96732

30 Mar 23
94-1329 Waipahu Street
Waipahu, Hawaii 96797
May 22, 1990

MR. JOSEPH MAGALDI, DEPUTY DIRECTOR
Department of Transportation Services
City and County of Honolulu
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

I live in Waipahu. I work in downtown Honolulu. Like other Leeward residents, I drive to and from work. The driving is very stressful and inconvenient as traffic is heavy and slow.

The proposed mass transit line will no doubt reduce my commuting time. I believe that riding the transit will be cheaper and safer than driving. It will also result in less air pollution.

Mass transit should have been built ten years ago. Please have it made at the earliest possible time for the convenience of the commuting public.

Sincerely yours,

ALIFIO A. CRISTOBAL
Leeward Resident
May 22, 1990

Mr. Amar Sappal
Department of Transportation Services
650 S. King St.
Honolulu, HI 96813

Dear Mr. Sappal,

This concerns the proposed rapid transit station at Kapiolani Blvd. and Isenberg Street.

Over 150 residents of the Marco Polo condominium have expressed their opposition to having such a large, unsightly structure blocking the entire front of our property. We feel that there is no need for having a station at such a small intersection where it will overwhelm the neighborhood, and that instead it should be at a major intersection.

We hope that you will reconsider your plans in light of this heavy community opposition.

Sincerely yours,

[Signature]

[Name]
Marco Polo Resident
Mr. Amar Sappal  
Project Manager  
Rapid Transit Development Division  
Department of Transportation  
650 South King Street  
Honolulu, HI 96813  

Dear Mr. Sappal,  

As a resident of Foster Heights Villas, I am against having the Rapid Transit route down Salt Lake Boulevard. I am in favor of the Kamehameha Highway route.  

Michael  
Resident Name  
5-19-90  
Date  

Resident Name  

E-25 HARD SALT LAKE AVE.  
Resident Address
May 22, 1990

Mr. Joseph Magaldi
Deputy Director
Department of Transportation Services
City and County of Honolulu
650 South Beretania Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

The increase in population and community growth that is happening especially in Mililani, Waipio, Waipahu, Ewa Beach, and now Kumu Iki, will mean that the traffic and all the problems that go along with it will have to be dealt with by government officials such as yourself. What I would really like to see is a mass transit system that would ease the traffic flow once these upcoming communities are fully populated. Therefore, I strongly support the City's mass transit plans.

Yours truly,

Karen DeMello
May 22, 1990

Mr. Joseph Magaldi
Deputy Director
Department of Transportation Services
City and County of Honolulu
650 South Beretania Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

No matter where we live on the Island of Oahu, traffic remains to be the #1 gripe of all of us who commute daily. Nothing would better than to be able to sit back and let someone else worry about fighting traffic. A mass transit plan seems to be the answer we're looking for and I am in full support of the City's rapid transit plan.

Yours truly,

Robert De Mello
May 21, 1990

Mr. Joseph Magaldi
Deputy Director
Department of Transportation
650 S. King St.
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

The traffic to and from Mililani is driving me mad! I seem to be spending my whole life on the highway!

When are we ever going to get that rapid transit system you people have been talking about for so long? We must get it immediately if my sanity is to be preserved!

I will personally bend my car's steering wheel around the neck of the next politician who delays the project!

Fay deNeeve
94-130-70 Anania Cir.
Mililani, HI 96789
TESTIMONY
On
HONOLULU RAPID TRANSIT DEVELOPMENT PROJECT
Alternatives Analysis / Draft Environmental Impact Statement

presented to
Department of Transportation Services
City & County of Honolulu
State Capitol Auditorium
8 May 1990

by
Bernard T. (Jack) Denton
400 Hobron Lane, #805
Honolulu, Hawaii 96815

My name is Bernard ("Jack") Denton, a resident of Waikiki, residing at 400 Hobron Lane, Apartment 805.

The fixed guideway alternatives include a tunnel or subway through Downtown along Hotel Street. As the Draft EIS notes, aerial structures for the elevated portions elsewhere "would have adverse visual impacts." [§8.4.2.3, page 5-32]

Why hasn't the AA/DEIS considered other alignment segments for such mitigation of adverse visual impacts by tunneling?

The Kuhio Avenue alignment through Waikiki is an essential segment of the proposed system in terms of ridership generation, cost allocation, and traffic reduction. This, the State's primary visitor destination area, is the area of greatest impact on the resident/visitor mix. The State and the City have spent millions on the beautification of Waikiki, including the redevelopment of Kuhio and Kalakaua Avenues. Certainly the residents, businesses, and visitors in Waikiki, and Kuhio Avenue in particular, deserve as much consideration in the mitigation of adverse visual impacts as do the bars, pool halls, sex shows, and porno shops of Hotel Street.

The Final EIS must consider and address other fixed guideway alignment segments for possible subway configuration, either in lieu of, or in addition to, the Hotel Street segment.
KURT DOANE  
91-683 LAUKONA LOOP  
EWA BEACH, HAWAII 96706  

May 21, 1990  

Mr. Joseph Magaldi  
Deputy Director  
Department of Transportation Services  
City and County of Honolulu  
650 South Beretania Street  
Honolulu, Hawaii 96813  

Dear Mr. Magaldi:  

I am a long-time resident of Ewa Beach and have seen the traffic build up as more and more people are moving into this area. With the development of West Loch and Kumu Iki, traffic problems will only increase if something isn't done. I therefore support the City's Mass Transit plans.  

Sincerely,  

Kurt Doane
May 14, 1990

Mr. Amor Saffel, Project Manager
Department of Transportation Services
650 South King St., 3rd Fl.
Honolulu, HI 96813

Dear Sir,

We live in Foster Village and want to express our desire for the mass transit system to go along Kam Highway past the Arizona Memorial, military base & airport. We do not want it in Salt Lake Block.

Thank you.

Sincerely,

Laad & Dale Dowdy
4527 Aleloa St.
Honolulu, HI 96818

P.S. We have lived in Foster Village 21 years.
May 23, 1990

Joe Magaldi, Deputy Director  
Dept. of Transportation Services  
650 S. King St.  
Hon., HI. 96813

Dear Mr. Magaldi,

I would just like to let you know that I support a light rail system for the City and County of Honolulu. As a resident of the Ewa Beach area, I have seen traffic get worse as more people move to the leeward side of the island. A rail system is definitely needed by our residents.

Good luck on this project! I hope to be taking my children for a ride on the system soon.

Sincerely,

Cathy Espero
14 May 1990

Mr. Amar Sappal
Project Manager, Department of Transportation Services
650 South King Street
Honolulu, HI 96813

Dear Mr. Sappal,

I am writing to express our displeasure and objection to the proposed Salt Lake Boulevard Elevated Mass Transit System route for the planned City of Honolulu fixed rail system. Our objections are based on our personal experiences in cities where elevated transit lines were once a part of the public ground transportation systems. These overhead systems were not only unsightly to the eye, but costly, noisy, dirty, and a contributor to vehicular traffic congestion. Almost all the older systems in two cities, Boston and New York, have been dismantled for these reasons; and, more importantly, the extremely high operations and maintenance costs. Both cities have run up sizeable deficits in an effort to maintain maximum user service. To offset the high costs fare increases were continually introduced, an action which seems to have little effect. Both Boston and New York systems have more riders than ever before, but the "payback" is still far off.

In my visits to Boston, at least once a year, I am continually amazed at the continued infusion of public funds (taxes) necessary to keep the system operating. Despite the ever increasing number of riders each year, the revenue fails to cover the costs. When one considers both Boston and New York public transportation systems go back almost 100 years, the early promises made by the enthusiastic promoters of a "no cost to the taxpayer," have never been realized. Not only that, every small improvement runs over in time and money.

Based on what we believe to be a conservative dollar and time of completion projection, we are skeptical about any promises made about building a rapid transit here in Honolulu. The endless delays with the completion of the H-3 freeway and the interconnect with H-1 is an example of the "foot dragging" in any effort to alter the existing ground mobility system. Whatever cost and completion projection is given when the first shovel full of dirt is moved, multiply it by three. And even then this is optimistic. We believe you should be realistic and consider the alternatives of legalized jitneys and small bus type transporters to interconnect with the present bus system. Also, we should consider adopting a high tax system for vehicles entering the congested areas. Another possibility is to put increased taxes on the second and third vehicles owned in one family (or individual).

Thomas and Doris S. Ferguson

THOMAS J. FERGUSON
4191 haloa Street, Honolulu, HI 96818
TESTIMONY ON THE ALTERNATIVES ANALYSIS AND DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HONOLULU RAPID TRANSIT PROJECT

MAY 22, 1990

As a research statistician/researcher for the State, I have met officially with City and County personnel and/or consultants working on the Honolulu Rapid Rail Project at least six times since 1987. During these meetings I have repeatedly raised questions about the ridership forecasts. By and large, my questions have gone unanswered. Indeed, when I attended a meeting of the Citizens Advisory Committee (CAC) of OPMO, on May 12, 1990, at the request of its chairperson, Dale Evans, my questions were not only rebuffed by representatives of the City and its consultant, they actually told me to "shut up" [1].

I will not shut up. So, I am using this forum to raise my questions once again, in the hope that they will be answered. My comments and criticisms are solely my own, and are not intended to represent the views of any government official or agency.

On each occasion that I met with members (staff and/or consultants) of the rail transit group I questioned the accuracy of ridership forecasts that were presented to policy makers and the public. While I am told that the forecasting model has been revamped and improved since different staff and consultants took over the project in 1989, I am still not convinced of the accuracy of the ridership projections, and I still feel that the forecasts are, at best, misleading.

There are several reasons for my skepticism. First, the ridership forecasting model is not presented in sufficient detail in the "Service and Patronage Forecasting Methodology" (SPFM) to allow it to be tested and verified. Second, my own analyses of the base-year data used in model indicate that the model's assumptions about transit growth are mistaken. Third, standard econometric methods of forecasting lead to ridership projections that are sufficiently disparate from those given in the AA/DEIS as to call the latter into question on a number of grounds. Fourth, the AA/DEIS projections ignore the accepted, professional standards of forecasting in failing to indicate the magnitude of error inherent in the forecasts.

To address my first criticism, the SPFM would have to more fully present and explain the actual formulas used in each portion of the model, and provide the actual data used. Many aspects of the model are glanced over in the SPFM. Others, such as the growth factors for work-trips, nonwork-trips and visitor-trips, seem straightforward enough to follow, but the City's personnel and consultants claim that they mean something different than what is stated in the SPFM. And while the logit
model and the related choice model are sensible in form, their application is unclear. How were the valued derived? Where do they come from? Are they realistic with respect to local conditions? How are they specifically applied to the cells of the trip table?

These are some of the questions that I have asked, either directly or through the CAC (see attachment). Many more questions come to mind. But most of them can be boiled down to two basic questions. How does the model make its forecasts? And, how accurate are the model's forecasts? These two basic questions need to be answered. It is impossible to determine how the model really works without more information. Nevertheless, some idea of its accuracy can be deduced. I have taken two different approaches to assessing the model's forecasts. First, by testing the models assumptions on data provided to me by the rail-group. And, second by comparing the model's forecasts to projections derived from the other accepted, forecasting techniques.

The remainder of my comments mainly explain these analyses and the conclusions I draw from them concerning the AA/DEIS.

Assessment of the AA/DEIS Work-Trip Ridership

It is clearly stated on page 11 of the SPFM that the model forecasts work-trips on the bus system, for each of the 190 zones, using the following formula:

\[
\text{Growth factor} = \frac{2005 \text{ population} + 2005 \text{ employment}}{1986 \text{ population} + 1986 \text{ employment}}
\]

This formula ascribes growth in work-trips to growth in population + employment by zone. More precisely, it defines the growth of work-trips within the model as a positive linear function of growth in population and employment. What is the basis for the assumption that there is a positive (i.e., direct) linear relationship between these factors and work-trips? No basis for this assumption is provided.

If it is true that work-trips are directly related to population and employment it is logical to expect that this relationship holds true across zones at a given point in time. Hence, to the degree the model's assumption of linearity is correct, base-year (1986) data on work-trips should bear a linear relationship to base-year data on population and employment (1985 data not 1986 data on these two variables are actually used in the model).

I therefore tested the model's assumption of a linear relationship between population + employment and work-trips on
the base-year data for the model. The 1985 zonal population and employment data and 1986 zonal work-trip data were all provided by City officials. The correlation between population + employment and work-trips was examined using three simple regression analyses. The first used work-trip origins as the dependent measure, the second used destinations, and the third combined origins and destinations for each zone and used the mean number of trips into and out of each zone as the dependent measure. These three different tests were run because the SPF is not sufficiently explicit in explaining how the model's growth factors are applied to trips by zone.

Consistent with the model, the total weekday work-trips in each analysis was 85,527: work-trips comprise 45.7% of all bus trips. In all three analyses, peak and off-peak work-trips were combined to form the dependent variable, and population and employment figures for each zone were added together to form the single independent variable. These same combinations of variables are used in the model for applying the growth factor to work-trips. Or, at least, so it appears.

The R-squared values from the three analyses were between 0.08 and 0.10. These results tell us that population + employment account for barely 10% of the zonal variation in work-trips. With such a weak association between the independent and dependent variables it is virtually impossible to even predict base-year work-trips from the base-year employment and population data.

Table 1
Accuracy of Estimates of Base-Year Work-Trips for Each Zone Using Base-Year Employment and Population Data for Each Zone

<table>
<thead>
<tr>
<th>Error Range of Estimate</th>
<th>Percent of Estimates in Range</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt; 10 %</td>
<td>5.8 %</td>
</tr>
<tr>
<td>10 - 20 %</td>
<td>10.0 %</td>
</tr>
<tr>
<td>20 - 40 %</td>
<td>16.8 %</td>
</tr>
<tr>
<td>40 - 60 %</td>
<td>34.7 %</td>
</tr>
<tr>
<td>&gt; 60 %</td>
<td>32.7 %</td>
</tr>
</tbody>
</table>

Table 1 shows how inadequate such predictions prove to be, even when the measures with the highest correlations are used. The mean absolute percentage of error, or MAPE [2] was over 120% for the entire 190 zones. Least squares estimates of 1986 work-trips from 1985 population + employment data (based on model's
assumption of linearity as expressed in the above growth factor formula were more than 40% off the mark for roughly two-thirds of the 190 zones. Only 15.8% of the 190 estimates are within 20% of the actual values, and a mere 5.8% come within 10%.

Since I made these findings public, albeit in abbreviated form, two spokesmen for the rail-group (one from the City and one from the consultant) have claimed that it is improper to test the model's assumptions by looking at its base-year. Their reasoning seems to be that since the growth factor only applies to changes over time it is not valid to test the model's assumption of linearity by looking at the spatial (geographic) distribution of the variables. This is illogical. How can one claim that a temporal relationship exists but not a spatial one? Especially, since the differential growth factors projected for each zone over time are expected to differentially affect ridership among the geographical zones in the model. Although the rail spokesmen refuse to acknowledge it, a linear relationship between the independent and dependent variables in space as well as time is implicit in the model's growth factors. And this assumption deserves to be tested.

Assessment of AA/DEIS Visitor-Trip Ridership

City personnel and the consultant from P. B. Q. & D., Inc., expressed some confusion, at the May 12 meeting of the CAC, about the formula used in the growth factor for trips other than the work-trip. The first paragraph of page 12 of the SPFM states that the growth factors for different types of trips incorporate variables other than population and employment in the formula. Yet project personnel, including the consultant, claimed there is only one formula for all types of trips, and that all trips use the growth factor that is given on the preceding page and page 11 of the SPFM. My reading of the SPFM leads me to believe that the following formula represents the growth factor used for projecting visitor trips, however.

\[
\text{Growth Factor} = \frac{2005 \text{ visitor dwelling units (hotel and condo)}}{1985 \text{ visitor dwelling units (hotel and condo)}}
\]

Although different variables are used, the formula is similar to the work-trip formula in that it describes a direct relationship between growth in visitor dwelling units and growth in visitor trips by zone. The assumption of linearity must therefore be tested, since no evidence for making the assumption has been presented in the AA/DEIS or its accompanying documents. As before, I believe it is logical to expect that since the model assumes that this relationship holds temporally it should also hold spatially: i.e., across zones. A test of the linearity between these variables across zones in the base-year therefore
provides a test of the validity of one of the model's main assumptions.

The 1985 and 2005 zonal data on hotel and condo units (note that 1985 is also the denominator for work-trips although the SPFIM gives 1986 in the formula) were provided by the City along with the visitor trip table. Peak and off-peak trip data were combined for the analyses, yielding a total of 21,467 trips, or roughly 11.5% of all weekday trips. As before, three analyses were conducted, one on trip origins, one on trip destinations, and a third on the mean of the two for each zone.

The R-squared values for these analyses range from a low of 0.24 for the origin data to a high of 0.52 for the destination data. Although these values are higher than those found in the preceding analysis of work-trips, the association between visitor trips and dwelling units found here is illusory, being due, in part, to the large number of zones (almost 88%) that do not have visitor dwelling units. Thus, when estimates of visitors-trips are made based on visitor dwelling units, the estimates are about as bad as those made for work-trips, having a MAPE of 94.3%.

Table 2

Accuracy of Estimates of Base-Year Visitor Trips for Each Zone
As Predicted from Base-Year Visitor Dwelling Units by Zone

<table>
<thead>
<tr>
<th>Error Range of Estimate</th>
<th>Percent of Estimates in Range</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt; 10 %</td>
<td>0.5 %</td>
</tr>
<tr>
<td>10 - 20 %</td>
<td>1.0 %</td>
</tr>
<tr>
<td>20 - 40 %</td>
<td>4.2 %</td>
</tr>
<tr>
<td>40 - 60 %</td>
<td>15.8 %</td>
</tr>
<tr>
<td>&gt; 60 %</td>
<td>78.5 %</td>
</tr>
</tbody>
</table>

As Table 2 shows, predictions of 1986 visitor trips by zone, based on the 1985 visitor dwelling units, are way off the mark. Less than 2% of the zonal predictions come within 20% of the actual visitor trips, even when the measures with the highest correlations are used. Over 78% of the predictions of 1986 trips have an error of greater than 60%. Again, we see that the variables that are purported to predict future ridership cannot even predict ridership for the model's base-year.

Perhaps, the consultants who developed the formula for projecting visitor trips are aware of its inadequacy. This would
explain why they state on page 12 of the SPFM that "It may be necessary to adjust the growth factors for visitor trips in locations that are visitor attractions, not residences, including the airport." But, true to form, no explanation is given in the SPFM as to how this adjustment would be accomplished, or what variables would be used.

Assessment of the AA/DEIS Ridership for School and Other Trips

Having analyzed visitor- and work-trips, which together make up 57.2% of all weekday trips, the only types of trips left to analyze are, what the SPFM refer to as, school trips and "other" trips. Unfortunately, the trip-table provided by the City does not contain data in these specific categories. The two remaining categories of trips in the City's data are entitled "Peak NonWork Trips" and "Off-Peak NonWork Trips." At the May 12 CAC meeting City personnel assured me that they gave me all the trip data in completely usable form. I have no reason to doubt their word and all the data add up to the correct total number of weekday trips (187,112) mentioned in the SPFM. But they provide no explanation as to how one converts from NonWork Trips to school-trips or to other-trips, nor does the SPFM do so.

Either category of NonWork Trips in the table might reasonably be taken to be the "other" trip category mentioned in the SPFM. But neither category of NonWork Trips would seem to be a likely candidate to be used as school-trips in the model. So I asked OMOD officials if they knew how school-trips were derived from either of the two types of NonWork Trips. They did not know. When I brought up this question at a CAC meeting it was summarily dismissed by rail-group personnel on the grounds that all trips use the same formula.

With nothing more to go on, I decided to guess. My guess is that the school-trips referred to in the SPFM are actually Peak NonWork Trips. Odd as this may seem -- and it certainly seems odd to me -- this leaves us with only the "other" trip type unaccounted for, which by elimination must be represented in the model by Off-Peak NonWork Trips.

The following two formulas, deduced from the explanation of the growth factors on page 12 of the SPFM, seem to be those used to predict future school- and other-trips by zone:

\[
\text{School-Trips (Growth Factor)} = \frac{2005 \text{ population}}{1985 \text{ population}}
\]

\[
\text{Other (GF)} = \frac{2005 \text{ population} + 2005 \text{ service & retail employment}}{1985 \text{ population} + 2005 \text{ service & retail employment}}
\]
These formulas define a direct linear relationship between the independent variables listed in the formulas and their respective trip-types by zone, just as did the earlier formulas. I therefore tested the underlying relationship expressed in the formulas, by seeing if their independent variables could predict their dependent variables (trips) in the model's base-year. Three tests were performed for each type of trip (school or other) as described earlier.

The R-squared for school-trips (i.e., Peak NonWork Trips) and population was less than 0.01 for all measures (origins, destinations, and average origins + destinations). In short, there is no linear relationship between school-trips and population by zone. Therefore, the estimates of 1986 school-trips for each zone based on the 1985 population data for each zone, are essentially random, with slightly over half (51.3%) the estimates having an error greater than 60%. This being so, it is absurd to use population as a predictor of school-trips, if, as I am forced to suppose, school trips are represented by Peak NonWork Trips in the model.

The results for other-trips were not any more impressive. No statistically reliable, linear relationship between other types of trips and the composite, independent variable exits. The R-squared value of all three tests fell below 0.05. Like those for school-trips, the zonal predictions for other-trips are essentially random, and are not worth presenting in tabular form. Clearly, these variables have very little to do with ridership.

The rationale, on page 12 of the SPF1M, for using population and service and retail employment to predict other types of trips sounds reasonable. But, in practice, it is incorrect. The estimates of other-trips that are made on the basis of population and retail and service employment by zone have a mean average percentage error (MAPE) of 88.8%, and 60.5% of all estimates had an error of over 60%. It is, of course, merely speculation on my part that the model defines other-trips as Off-Peak NonWork Trips. A complete explanation of the model, as requested by the CAC, would put an end to the need for such speculation. In the absence of sufficient information, however, what else can a person do to try to assess the AA/DEIS ridership projections?

AA/DEIS Bus-Ridership vs Econometric Bus-Ridership Forecasts

To answer my own question, another thing that can be done to assess the AA/DEIS ridership projections is to compare them to predictions based on other types of models. Although, for some reason, the AA/DEIS eschews the use of such models, they are the standard used in virtually all kinds of forecasting.

These models do precisely what the model proposed in the AA/DEIS does not. They establish if a linear relationship exists
between a number of independent variables (such as population, employment, etc.) and a dependent variable (e.g. ridership), and then use that relationship to forecast future levels of the dependent variable.

Four important economic/demographic variables are forecast up to the year 2010 by the Department of Business and Economic Development (DBED): resident population, employment, visitors and per capita income. Historical changes in these variables are documented in the "Data Book" series published by DBED.

Given the availability of historical information on bus ridership and other aspects of the bus system, it is a rather straightforward matter to determine the influence of these factors on bus ridership in the past. Various types of data on bus operations on Oahu, going back to the early to mid 1970's, can be found in DTS's short-range plans and similar data is also in the State Data Books. Earlier data is available but it is not as extensive.

I decided to start with three independent variables in the model: resident population, number of buses and per capita income. Resident population of Oahu was chosen because it is a major component of the AA/DEIS ridership model. Number of MTL buses was chosen because of the obvious and well-established relationship between service and ridership. While it provides only a very crude measure of service, the historical data is good and number of buses has long been an important aspect in considering transit alternatives for Oahu. Although per capita income has usually been ignored in transportation planning for Oahu, it has been shown to affect mode-split.

Using data from the early 70's through 1987, I regressed these three variables on weekday MTL bus-ridership for Oahu. The R-squared value resulting from this analysis was 0.92, indicating that these three variables, taken together, are very good predictors of total weekday ridership (linked trips). In fact, subsequent analyses showed, neither of the other variables, singly or in combination, could significantly improve the model. A printout of the initial model, which uses the correction for linked trips (based on the 1986 on-board survey) described in the SPFM is attached.

Resident population, per capita income and number of buses proved to be an even better predictor of revenue passengers, with an R-squared value of 0.96. One is struck by the size of these R-squared values compared to those found for the variables used in the various components of the model presented in the AA/DEIS. The historical model is far simpler, accounts for more of the variance in ridership and has a historical base from which to extrapolate to the future.
The cry I have long heard from the City's rail-group and its consultants is that a aggregate model (one that ignores zones) cannot be used for their purposes. A disaggregate, or zonal model is needed, they insist. Is using the disaggregated data really any more useful than using the aggregated data?

While we may not be able to completely answer the question, we can see if ridership predictions from the disaggregated data are substantially different from those made from the aggregated data. Ordinarily, this would very difficult, if not impossible to do. But the City's personnel and/or consultants repeatedly stated at two CAC meetings that the model only uses one growth factor, and that the growth of trips from 1986 to 2005 is expanded by the formula given on page 2 of these comments and page 11 of the SPFM. This makes the matter quite simple. First, we can apply the formula to each zone, then sum the zones to get the total forecasted ridership for 2005. Second, we can sum the change in population and employment by zone, find the total difference between 1985 and 2005, and apply that growth to the total 1986 ridership. (The second step need not be so round-about since the population and employment projections are actually done on the aggregate level by DBED before they are broken down by zones.) Finally, we can compare the two approaches.

When we do this we find a projected weekday bus-ridership of 212,200 using disaggregated data. Applying the growth formula to the aggregated data (i.e. the total 187,112 1986 weekday trips in the model) we obtain a value of 228,235 trips for the year 2005 (ignoring the unknown adjustments to the model made through its logit analysis). The difference is less than 16,305 trips, a difference of less than 8%. Since the error for either prediction is at least plus or minus 50,000 riders (given an R-squared of 0.08 for 1985 population + employment and total weekday trips) the difference between the two estimates is trivial.

Of course, neither approach is satisfactory in its present form because there is no justification for the growth factors -- they are poor predictors. But our analysis shows that the aggregate approach yields comparable results, so why has all this time and money been spent on a disaggregate model that yields such poor results?

The aggregate models that can easily be developed from historical data are certainly better, although the best model I have been able to construct still has an error of plus or minus 30,000 weekday trips in 2005. But, at least it tells us what the real error is, something that the AA/DEIS projections fail to do. The AA/DEIS does not consider the error inherent in the model itself, the sampling error of the survey used to establish base-year ridership, the error that exists in DBED's projections, or
the error that comes from disaggregating DBED forecasts to the zonal level.

Furthermore, the basic growth model flies in the face of historical trends. All measures of bus ridership have shown a significant decline (p < 0.001 using the change-point test) since 1984 or so. The econometric models I developed for Oahu bus ridership clearly indicate that ridership will not increase as the AA/DEIS predicts, and that revenue passengers will actually decline in the future. This, despite the fact that tests of the models show that they tend to over-estimate ridership for 1988 and 1989 by roughly 10%.

Some Conclusions

How can anyone be expected to believe the ridership projections presented in the AA/DEIS when: 1. so little information about the ridership model is provided, and 2. what can be discerned about the model indicates that it is wrong.

For all its apparent sophistication, the model used to make the ridership forecasts in the AA/DEIS is basically flawed. Its assumptions are untenable and predictions from it are bound to be erroneous, since the variables used in the growth factors are incapable of predicting bus ridership even for the year on which the model is based. The main aspects of the AA/DEIS model that have been tested demonstrate that it is fraught with error. Indeed, its inherent error far outweighs its predictive power.

I can imagine that the suggestion will be made that the logit analysis corrects for such error. But, for now, the logit model is just another unexplained black box, which appears to serve mainly as a final fudge factor in the forecasts.

Unless the model is explained in full, the forecasts from it are worthless. And, given the foregoing analysis, I suspect that they will still be worthless after the model is explained. For, as I noted a moment ago, the AA/DEIS forecasts contain not only the considerable degree of error attributable to its growth factor, they also contain the sampling error from the survey used to establish base-year ridership, the error that exists in DBED's projections, and the error that comes from disaggregating DBED forecasts to the zonal level.

Kevin J. Flannelly, Ph.D.
FOOTNOTES

1. The statement "Oh, shut up!" was made to me by Mark Sheibe of Parsons, Brinckerhoff, Quade & Douglas (P.B.Q. & D.), the project consultant, when I challenged his assertion that all the information that the CAC requested on the ridership model (see attached) was already contained in the May 1989 draft of the "Service and Patronage Forecasting Methodology."

2. The statistical measures and techniques referred to in the text are explained in a number of standard textbooks on econometrics and statistics.
May 21, 1990

Mr. Joseph M. Magaldi, Jr.
Deputy Director
Department of Transportation Services
City & County of Honolulu
650 South King Street - 3rd Floor
Honolulu, Hawaii 96813

Attention: Julie Tavares

Dear Mr. Magaldi:

I support the City's Rapid Transit Plan and your department's efforts to develop railed mass transit contained within that plan.

Sincerely,

Paul S. Francisco

Name

1805 Owana St.

Address

Honolulu, Hawaii 96819

City Zip Code
Mr. Amar Sappal  
Project Manager  
Rapid Transit Development Division  
Department of Transportation  
650 South King Street  
Honolulu, HI 96813  

Dear Mr. Sappal,

As a resident of Foster Heights Villas, I am against having the Rapid Transit route down Salt Lake Boulevard. I am in favor of the Kamehameha Highway route.

Paul C. Franke  
Resident Name  

16 May 20  
Date  

Resident Name  

4280 Salt Lake Blvd., #3-14  
Resident Address
From: Mary Gasper  
To: Rapid Transit Development Division, Department of Transportation Services, 650 S. King St, 3d Floor, Honolulu, HI 96813  

Subj: Honolulu Rapid Transit Development Project (Comments based on AAA EIS of Mar 1)

My name is Mary Gasper, and I do not represent any group. I’m a retiree, and have lived in Kaimuki since 1949. I have no opinion on which route the proposed monorail should take, which was what you asked. That seems to me that the government officials here have already decided there will be a rapid transit monorail.

What I am alarmed about is that it seems that both the City and State are committed to a policy of selling zoning and other privileges to private developers, using the pretext that we’ll get a “free” benefit that we can’t pay for as a municipality. See page 6-18 of the EIS document: The City and County of Honolulu is exploring the opportunities for operating revenues from various real estate-related sources, including joint development, benefit assessment districts, and tax increment financing. One or more of these sources must be implemented to cover projected operating deficits. The strengths of the City’s economy and real estate market and prior City successes in using some of these mechanisms suggest that these types of financing mechanisms can be successfully implemented.” What are we talking about? The success of giving up our height and density restrictions to the developer of the Aloha Motors site? That’s the beginning of 500 foot buildings, no setbacks, very few trees. Is that a success? Or the Kakaako Redevelopment. We’ve now waived the requirement for affordable housing in the complexes there. And what did the public officials say? The plan can’t work, it was just a dream to mix homes for the rich and poor, and places to work all in the same neighborhood. But aren’t we, the public, told repeatedly that long range planning is a fact here in Honolulu, that it’s sacred. Zoning by exception has obviously become the rule when there are big bucks involved.

I also object that we the public are not being told the truth, as shown in the EIS. When the legislature passed the law at the end of the session that, if no deal can be made with a private developer, there will be a 12½% increase in our excise tax, with a change from 4.0 to 4.5%. But they also say that will only be for a limited period of time. Just look in that financial analysis section—the proposal is for that one-half percent excise tax to be perpetual. Perpetual! Another alternative shown is for a one percent excise tax for a six-year period. But as shown in the EIS, that results in significant operating requirements which are not met.

Why aren’t we told the truth as to these costs? It seems to me we as a city and county can’t really afford the monorail. And just remember it will stop at Waiawa; more billions would be needed to extend it to the Second City location.

Mahalo.
729 12th Ave
Honolulu, HI 96816
May 23, 1990

Mr. Amar Sappal
Project Manager
Department of Transportation Services
50 South King Street, 3rd Floor
Honolulu, HI 96813

Gentlemen:

This is my written testimony on the Honolulu Rapid Transit Development Project. Please consider this as a supplement to the oral testimony I gave on May 8, 1990.

1. Mr. Magaldi's actions at the May 8 hearing were very offensive to me. While Janet Kavelo was testifying, he was particularly belligerent to her. She did use more than five minutes, but so did proponents of the monorail. Many in the audience did not like the treatment she received from Mr. Magaldi, possibly because she was very knowledgeable, or possibly because it was inequitable. Anyway, Mr. Magaldi threatened to terminate the hearing. I had already been called as the next speaker, and was walking to the podium when Mr. Magaldi made this announcement. I asked if the hearing was over. He replied, quite irritated, that the audience was making too much noise, and this was a public hearing. I said I had followed all the rules, had been waiting for more than 2 hours, and was a member of the public. Personally, I doubt that Mr. Magaldi was interested in anything the public had to say; that the hearing was only pro forma to meet the requirements of Chapter 49 CFR Part 611.11.

2. My comments about the financial difficulties that would result from building a monorail included the question why no financial projections had been made to replace the rails and other metal structures. (The original capital expenditures, development costs, maintenance and operating expenses, and financing charges were the only costs used.) But on Oahu, any metal structures are prone to rapid rusting, as shown with the Aloha Stadium. It is very necessary that a financial provision be made for this fact of tropical island living in a planning document. (These comments were verbal, but not in the original written testimony which I originally provided to you.)

Sincerely yours,

[Signature]

MARY S. GASPER
May 15, 1950

Dear Mr. Sappal,

Because of the East-End Viaduct on Ewa Rd. I would like to propose a "rapid transit" in South Ewa Rd. I feel a rapid transit would be more practical and

D.E. Gately
May 22, 1990

Mr. Amar Sappal, Project Manager
Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, Hawaii, 96813

Dear Mr Sappal:

I am registering an official objection on using Salt Lake Boulevard as a Mass-transit route.

Salt Lake Boulevard is NOT large enough to support such an endeavor. Keep the system on the main artery of transportation, i.e. Kam Highway.

I personally do not feel a Mono-rail system will resolve our crowded transportation problem, but will add complications and certainly will not reduce the number of cars on the roads of our city.

Sincerely,

Orville Gilkerson
1556 Piikea Street
Honolulu, Hawaii 96818
Testimony for: Honolulu City Department of Transportation, Rapid Transit Development Division

Aloha!

I think the idea of having a fixed rail mass transit system is a good one. Thousands of people board onto the state of the art shuttle and move at a high rate of speed to and from their places of work.

It sounds great. We should pin a medal on every supporter's chest, or should we?

It's going to cost over a billion dollars just to build it. The projected ridership is about 165,000 trips per day. That’s about 80,000 people going to and from work. That figure is 50% higher than the actual ridership on the most successful fixed rail system in the country, which is in an area far more populated than our city.

We're going to have to do more than tear down a municipal parking lot downtown and build a convention center with inadequate parking to get 80,000 people to ride the fixed rail system.

People in Hawaii love their cars. Housing is getting so expensive that for many of us, our car is our biggest and most cherished investment, and we love to ride in them.

Even if the projected ridership of the fixed rail system was accurate, at a conservative estimate of a billion dollars divided by 80,000 riders, it's about 12.5 thousand dollars per rider just for construction cost.

That's prohibitive.

It seems appropriate to seriously seek out other alternatives. The city's alternative analysis draft E.I.S. lists 11 alternatives. Nine using the fixed rail system, one using an expanded bus system, and one not doing anything.

How creative.

What about other alternatives, or combinations of alternatives, such as tax incentives for carpooling using an electronic eye for monitoring, tax incentives for home work stations, tax incentives for staggered work hours, mini cities located outside of Honolulu, and removing the prohibitive cost and red tape to allow for private passenger van services.

As technology is developed, the cost of a future fixed rail system is likely to be less than the one presently being proposed and to the argument that if we don't get the available federal monies now, we'll lose the opportunity, I would think it doesn't make sence to waste our money, whether it comes from the federal, the state, or the city.

I'm sure that our construction industry is actively encouraging the massive boondoggle of a fixed rail system, but I sincerely hope that the decision makers on this project are moral and ethical people with vision and will more seriously explore other alternatives for mass transit.
May 21, 1990

Mr. Magaldi, Director
Department of Transportation Services
City and Honolulu
630 South King Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

I am a native of Hawaii raised in Mililani. As a young adult I have watched the traffic from my home get worse and worse each year. It takes longer and longer to get to work.

I don't know if the proposed transit system will solve all the problems, but no one talks about adding more highways, so I support the system to relieve the traffic problems both to and from work.

Sincerely,

[Signature]

FREDRICK K. GRACE
95-302 Waipuolo Place
Mililani Town, HI 96786
May 21, 1990

Joe Magaldi, City Mass Transit Department
City Hall
Honolulu, Hawaii

Dear Mr. Magaldi,

Please do everything to build the fixed rail mass transit system as proposed for Honolulu. It is needed to get cars off of the inadequate freeway we have, so those of us who live in East Oahu can get to work.

Keep up the good work.

Yours truly,

Roderick Graham
May 21, 1990

Mr. Joseph M. Magaldi, Jr.
Deputy Director
Department of Transportation Services
City & County of Honolulu
650 South King Street - 3rd Floor
Honolulu, Hawaii 96813

Attention: Julie Tavares

Dear Mr. Magaldi:

I support the City's Rapid Transit Plan and your department's efforts to develop railed mass transit contained within that plan.

Sincerely,

[Signature]

Name

91-463 Papipi Road

Address

[Handwritten Address]

City

Kaneohe

Zip Code

96746
May 22, 1990

Mr. Joseph Magaldi
Deputy Director
Department of Transportation Services
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

I would like to notify you that I am in support of the City's rapid transit plan. I also believe the City has conducted adequate research in planning the route in a way to prevent the least disruption to homes and to businesses.

Adding more buses to the system just won't solve the problem in meeting our transportation needs. I also feel the research done on the environmental aspects is quite adequate.

Sincerely and aloha,

[Signature]
May 29, 1990

Department of Transportation Services
City and County of Honolulu
650 S. King Street
Honolulu, Hawaii  96813

Attention:  Mr. Joe Magaldi
Deputy Director

SUBJECT:  FIXED GUIDEWAY - MASS TRANSIT

Dear Mr. Magaldi:

Be informed that we support the Design, Construction and Operation of the subject system for the City and County of Honolulu.

Sincerely,

CHRISTOPHER G. HONG

AUDREY L. HONG
4296 Halupa Street
Honolulu, Hawaii  96818
JOHN H. HUGHES  
91-635 Kauwili Street  
Ewa Beach, Hawaii 96706  

May 21, 1990  

Mr. Joseph Magaldi  
Deputy Director  
Department of Transportation Services  
City and County of Honolulu  
650 South Beretania Street  
Honolulu, Hawaii 96813  

Dear Mr. Magaldi:  

I am a resident of Ewa Beach and as more and more people are moving into this area with the development of West Loch and Kumu Iki, traffic problems will only increase if something isn't done. I am in full support of the City's Mass Transit plans.  

Sincerely,  

John H. Hughes
May 22, 1990

Keith I. Ishida
94-442 Keaopua St. #34A
Mililani, Hawaii 96789

Mr. Joseph Magaldi, Deputy Director
Department of Transportation Services
City and County of Honolulu
650 South King Street, 4th Floor
Honolulu, Hawaii 96813

Dear Mr. Magaldi,

This letter is in support of developing a rapid transit system for the City and County of Honolulu.

As a resident of Mililani, I travel through the most heavily congested transportation corridor on Oahu. Over the years, I have seen my commuting time steadily increase to nearly one hour. I cannot imagine what my commuting time will be in a few years unless a comprehensive transportation solution is developed for Honolulu.

I believe such a solution will have to include the development of a rapid transit system. Your Department's efforts in bringing Honolulu's rapid transit project to its present stage is commendable. However, it is clearly evident that it is time to move into full scale development. Further delays will only make a future solution more expensive and harder to implement. I strongly encourage your Department to proceed with the development of a rapid transit system for Honolulu as quickly as possible.

Very truly yours,
[Signature]
Mr. Amar Sappal  
Project Manager  
Rapid Transit Development Division  
Department of Transportation  
650 South King Street  
Honolulu, HI 96813

Dear Mr. Sappal,

As a resident of Foster Heights Villas, I am against having the Rapid Transit route down Salt Lake Boulevard. I am in favor of the Kamehameha Highway route.

Resident Name  
5/19/90  
Date

Resident Name

0-17  4800  33RD  AVE  BLD
Resident Address
Mr. Joseph Magaldi, Deputy Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street  
Honolulu, Hawaii 96813  

Dear Mr. Magaldi:

I am disgusted by all the delays rapid transit has been encountering over the years. It is obvious that traffic is getting worse every year and I can see no other way to alleviate it other than building rapid transit.

I would be extremely pleased to see transit construction begin immediately. We need it now!

Sincerely,

Audrey C. Izumoto

457 Lawelawe Street  
Honolulu, Hawaii 96821  
May 21, 1990
May 10, 1990

Mr. Joe Magaldi
Deputy Director
Dept. of Transportation
Services
650 S. King Street
Honolulu, Hawaii 96813

Re: Transit System

Dear Sir:

I understand that the proposed transit system now being considered for Oahu may involve the Waikiki area. If this be the case I STRONGLY OPPOSE such a system in the area of my residence. I have lived in Waikiki since moving here in 1964 and we have had enough "new" things added to this area in those twenty-six years. Some of the new changes have helped, like widening Kuhio Avenue, but most of the others have not.

Therefore I am adding my vote against this new transit system being constructed to include Waikiki.

Very truly yours,

Patricia A. Jagielski

cc: Honolulu City Council
Mr. Amar Sappal  
Project Manager  
Rapid Transit Development Division  
Department of Transportation  
650 South King Street  
Honolulu, HI 96813  

Dear Mr. Sappal,

As a resident of Foster Heights Villas, I am against having the Rapid Transit route down Salt Lake Boulevard. I am in favor of the Kamehameha Highway route.

Vicky E. Johnson  
Resident Name  

5/14/90  
Date

Resident Name

4380 Salt Lake C-13, Honolulu, HI 96818  
Resident Address
May 22, 1990

Mr. Joseph M. Magaldi, Jr.
Deputy Manager
Department of Transportation Services
City and County of Honolulu
650 South King Street
Honolulu, HI 96813

Dear Mr. Magaldi:

Honolulu needs a reliable alternative means of transportation now, before automobile disincentive programs can be implemented on a large scale. We already have disincentives to using the automobile: the high cost of fuel, maintenance, and insurance; limited parking space available in the congested central Honolulu area; and growing traffic gridlock on the major thoroughfares all over Oahu.

It doesn't take a genius to see the serious need for a transit system. This would be a means of carrying many people using the least amount of land area.

I support mass transit, and I hope the City's mass transit proposal is allowed to proceed.

Sincerely,

[Signature]

James Kalawole
Mr. Joseph Magaldi, Deputy Director  
Department of Transportation Services  
City and County of Honolulu  
650 S. King Street  
Honolulu, Hawaii 96813  

Dear Mr. Magaldi:

We have watched Honolulu struggle for too long with the issue of rapid transit. We are writing in support of the City Administration's rapid transit plan which is a sound one and one which should be aggressively pursued.

Action is long overdue and recent approvals from Washington mean momentous gains which cannot be lost! The state legislature's support, crucial to the city's plan has also been successfully won.

We applaud your efforts and strongly urge the City Council support this plan.

Sincerely,

Fong Ye  
2251-A Hyde St.  
Honolulu, HI 96822

Annette Chun-Wing  
961 Lumamui St.  
Honolulu, HI 96816

Annette Maehara  
6822 Kalakaua Ave.  
Honolulu, HI 96821

Alain L. Vye  
744 Makaohi Ave.  
Honolulu, HI 96815

Joanne L. Miyake  
2251 Aana St.  
Honolulu, HI 96815

Julie Yamaguchi  
538 17th Ave.  
Honolulu, HI 96816

Teruaki Fujikawa  
3151 Moanalua Ave.  
Honolulu, HI 96815

Dorothy Aroyo  
1459 Nuuanu Ave.  
Honolulu, HI 96817

Makoto Sagawa  
1144 Kapiolani Blvd.  
Honolulu, HI 96814

Lynn K. K. Choy  
3915 Paiaoa Ave.  
Honolulu, HI 96815

Alice C. I.  
6714 Kamehameha Ave.  
Honolulu, HI 96816

Salome W. Wahi  
1936 Holokea Dr.  
Honolulu, HI 96816

A. L. K. K.  
6714 Kamehameha Ave.  
Honolulu, HI 96816

James M. Akau  
2291 Aipono St.  
Honolulu, HI 96822

Hulapapa Komori  
1414 Kapiolani Blvd.  
Honolulu, HI 96814

Kazuo Ishida  
1579 Kapiolani Blvd.  
Honolulu, HI 96814

Jane Charters  
1660 Kapiolani Blvd.  
Honolulu, HI 96814
Pamela Kiyama
91-1035 Kahana St
Ewa Beach, HI 96706
Mr. & Mrs. Takaji Tokumaru
1807 Lime Street
Hilo, HI 96726

Joe Cybulski
99-037 Kekiiwa Way
Aiea, HI 96701
TESTIMONY FOR PUBLIC HEARING ON THE ALTERNATIVES ANALYSIS AND DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HONOLULU RAPID TRANSIT PROJECT

Hawaii State Capitol
May 8, 1990

Good evening. My name is Janet Kawelo. I have worked for the Office of the Lieutenant Governor for the past three and a half years where I have had responsibility for following transportation issues. My comments this evening, however, are not made on behalf of the Lieutenant Governor nor as a representative of that office. The remarks I make are my own, and are directed at the inadequacy of the non-rail alternatives contained in the AA/DEIS.

According to the AA/DEIS, rail transit is going to cost Honolulu taxpayers between $900 million and $1.4 billion more than improving bus service. No other city in the U.S. with less than a million residents has undertaken such a costly transit venture. Smaller rail cities with populations of just over a million as opposed to two or three million have generally opted for less expensive rail systems, systems with tracks running at street level, not requiring the expense of an elevated structure or underground tunneling. Capital costs for at-grade systems entail several hundreds of millions of dollars as opposed to grade-separated systems which bump costs into the billions.

A city the size of Honolulu with just over 800,000 residents does not have the taxpayer base over which to spread the costs of a billion dollar transit system. Per capita
incomes of Hawaii residents have fallen from 22 per cent above the national average in 1970 to only 2 per cent above average today. Yet our cost of living is 29 per cent higher which means we have 27 per cent less buying power on average than our Mainland counterparts. Further eroding the buying power of Hawaii residents are our high taxes—fourth highest in the nation according to the national Tax Foundation.

The point of this argument is to impress on policymakers the implications of committing Honolulu taxpayers already strapped financially by Hawaii's high costs, to paying for a "Cadillac" transit system without a very careful and sincere examination of all possible alternatives.

But the City has a mission, the same mission as for the past 20 years, and that is to deliver rail transit without any serious consideration of non-rail alternatives. Evaluation of other alternatives has been merely a matter of going through the motions.

Improving bus service is a much less costly proposition than building a rail line. The City should be doing its utmost first to make all possible improvements to the existing bus service before embarking on rail. Atlanta made vast improvements in bus service over the six years prior to the start of rail service, through fleet expansion, new park & ride lots, route changes, and lower fares, and consequently transit ridership increased 34.5 per cent, compared to 19.8 per cent in the first nine years of rail service. The point is, there is no magic in rail. Transit ridership in San Diego, Buffalo,
Portland, Sacramento are still below levels that existed in the several years prior to the commencement of rail service.

Bus service improvements on Oahu, however, might damage the case for rail. When Eileen Anderson was elected Mayor in 1980, one of the first things she did was to suspend planning on rail transit. Bus ridership increased 11 per cent during her 4-year term. In the five years following the re-election of Mayor Fasi in 1984 and the resurrection of the rail planning effort, bus ridership has dropped a half per cent.

The two bus alternatives presented in the AA/DEIS are not viable transit options. The No-Build alternative is intended as a baseline for comparative purposes, and the TSM alternative requires a doubling of the bus fleet from its present 475 to 997 buses with a resulting increase in ridership of only 23 per cent. Obviously, this size bus fleet is not cost-effective for evaluation by local decisionmakers even though it may deliver a level of service required by UMTA for comparison with rail in the AA/DEIS process. The Oahu Regional Transportation Plan (Hali 2000) which came out in 1984 examined different size bus fleets and concluded that an 800 bus fleet when compared to 600 buses probably would not be cost effective because the additional 200 buses would generate only 5 per cent more riders. Even the consultant for the AA/DEIS admitted that a 997 size bus fleet operating at a level of service as in the AA/DEIS probably is unrealistic.

Rail transit is not going to solve Oahu's traffic congestion problems despite what government officials would have
us believe. Its impact on traffic will be marginal at best. According to the AA/DEIS, rail transit will reduce travel by 1.2 per cent compared to improved bus service. The Hall 2000 report projected a reduction of 1 per cent in travel relative to improved bus service. Federal, State, and even City transportation planners working on the rapid transit project admit its impact on traffic will be negligible.

What then will rail achieve? Supposedly cut commute times for transit riders by providing a separate right-of-way on which transit riders can bypass traffic. But this can be done with buses too. There has been no serious evaluation by the city of the provision of dedicated bus/HOV lanes across town on existing streets, on the proposed Makai Boulevard above Nimitz Highway, on a widened H-1 as contained in State highway plans, or on a separate guideway like the Daimler-Benz O-Bahn system which the manufacturers cite as costing 60 per cent of rail. The O-Bahn guided busway is of the same dimensions as rail, does not require automation and electrification, could tie into the HOV lanes on the Nimitz Viaduct, thus reducing the need for transfers, and is advertised as having capacities close to the rail technologies being considered for Honolulu. There are such guided busways in Essen, Germany and Adelaide, Australia.

The City claims to have reviewed busway alternatives in their earlier planning for HART. But in the HART alternatives analysis, the busway alternative was the equivalent of a 4-lane freeway. The City frequently comments on how fortunate we are that the earlier HART planning was derailed because of the many
subsequent improvements in rail technology that have been made. With respect to busways, the City maintains there have been no major improvements and refuses to explore the new O-Bahn guided busway system.

The No-Build and TSM bus alternatives may be required by UMTA in the AA/DEIS process but if we are to chose a locally preferred alternative among the alternatives contained in this document, there needs to be a lot more work done on developing some realistic bus options. Once a good-faith effort has been made to maximize bus service and further improvements are no longer cost-effective, then and only then should Honolulu consider such an expensive transit option as grade-separated rail.

Janet Kawelo
95-211 Ka‘eo‘e Place
Mililani Town, Hawaii 96789
May 21, 1990

Mr. Joe Magaldi
Transportation Department
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

I am a young Hawaiian raised in Hawaii (Mililani) with every intention of living in Hawaii for the rest of my life. As I have grown and joined the work force, it has become obvious that the traffic gets worse and worse getting to and from work. Even car pooling, as I do, has not solved the problem.

I don't know if the transit system is the solution but it surely won't hurt. Please add me to the list of your supporters.

Very truly yours,

[Signature]

GEORGE L. KEKUNA, JR.
May 21, 1990

Mr. Joe Magaldi
Department of Transportation
650 S. King Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi,

I am writing to let you know that I am in favor of the Fixed Guideway option for rapid transit for Oahu. Oahu cannot provide enough roadways to and from the urban areas, nor enough parking when you get there. My alignment preference is for the Salt Lake Boulevard route, rather than Kam highway.

Sincerely,

Willard D. Kemp
1465 Punalau St.
Honolulu, Hi. 96818
May 12, 1990
Mr. Joe Magaldi
Department of Transportation
650 S. King Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi,

I am writing to let you know that I am in favor of the Fixed Guideway option for rapid transit for Oahu. Oahu cannot provide enough roadways to and from the urban areas, nor enough parking when you get there. My alignment preference is for the Salt Lake Boulevard route, rather than Kam highway.

Sincerely,

Florence L. Kemp
1465 Puanakau St.
Honolulu, Hi. 96818
Mr. Amar Sappal  
Project Manager  
Rapid Transit Development Division  
Department of Transportation  
650 South King Street  
Honolulu, HI 96813

Dear Mr. Sappal,

As a resident of Foster Heights Villas, I am against having the Rapid Transit route down Salt Lake Boulevard. I am in favor of the Kamehameha Highway route.

________________________________________  
Michael G. Kiczek  
Resident Name

________________________________________  
Judy T. Dartez-Kiczek  
Resident Name

________________________________________  
4280 Salt Lake Blvd, D23  
Resident Address

5/19/90  
Date
Robert A. Kilthau  
1310 Haloa Drive  
Honolulu, HI 96813  

Department of Transportation Services  
City and County of Honolulu  

COMMENTS ON THE ALTERNATIVES ANALYSIS/DRAFT ENVIRONMENTAL IMPACT STATEMENT (AA/DEIS) FOR THE HONOLULU RAPID TRANSIT DEVELOPMENT PROJECT  

I have been a property owner and resident of Foster Village for 23 years.  

My comments concern the alternate alignment options in the Salt Lake/Airport area.  

I agree with the conclusions and recommendations of the CITIZEN REPORT of the Honolulu Rapid Transit Development Project Study of April 1990 that indicates 80% of the participants favor the alignment option of Kamehameha Highway rather than Salt Lake Boulevard.  

The Salt Lake route and its park-and-ride drivers would bring too much noise, pollution and congestion to an already crowded area, and the stations would still be so far from most residents, that a shuttle bus service would be required.  

There are homes on both sides, all along the Salt Lake route that would be adversely affected.  

Increased activity and noise caused by the construction and operation of the system will adversely affect the quality of education at the three schools along the route.  

I grew up in New York City. One of the reasons I live here now is to get away from the type of environment that this system would create if installed along Salt Lake Boulevard. I suspect that the people who prefer this route simply have not experienced the reality of living with such noise and congestion, and will be very disappointed if it comes to pass. The people of Foster Village would experience everyday of the week what now happens during a sold out football game at Aloha Stadium.  

The Kamehameha Highway route is the best alternative for the residents of this neighborhood.  

Very Respectfully  

[Signature]
May 22, 1990

Jerry Kim
2428 Lanai St.
Honolulu, HI 96817

Mr. Joseph Magaldi, Deputy Director
Department of Transportation Services
650 S. King St.
Honolulu, HI 96813

Dear Mr. Magaldi,

We need a rapid transit system for Honolulu. Honolulu's highways are already heavily congested during rush hour, and it will only get worse.

I hope the City can start building a rapid transit system as soon as possible to help us get to work and school faster.

Sincerely,

Jerry Kim
May 22, 1990

Mr. Joseph M. Magaldi, Jr.
Deputy Manager
Department of Transportation Services
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

I ride TheBus everyday to work, but I want to ride on a rail system that is clean, comfortable, and can get me to places on time.

I'm willing to pay a little extra for the convenience (and ultimate economy) of a mass transit system. I've ridden them elsewhere, and I know they can work.

I support mass transit.

Very truly,
St. John's University

(A member of the Pacific Group)

Office of the President

Dr. Philip W. Koehler

Mr. Amos Leppal, Project Manager
Dept. of Transportation Services
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Dear Mr. Leppal:

As a resident of Koolau Village, I am writing to protest the proposed routing of mass transit down Salt Lake Boulevard. It makes much more sense to use the route it down Kam Hwy, which would provide easy access for riders, service tourists, and be dropped in close proximity to the Arizona Memorial, the military bases, and the airport. I am certain that this route would result in a greater ridership and obviate the increased congestion of the Salt Lake Blvd. route.

My wife shares my sentiments and concern so you can add two more protesters to the proposed routing.

Aloha,

P.S. Best regards,

P. Koehler
1341 Kukui St.
Honolulu, HI 96818

P.O. Box 2777 Honolulu, Hawaii 96820
TESTIMONY of
Jim Koshi

I am Jim Koshi. I am testifying as a private citizen. I have attended many meetings and read various studies and reports concerning our transportation problems and possible solutions. I commend the Department of Transportation Services for the many presentations made in many districts.

I support the need for a grade separated rail system integrated with feeder buses. I also support the project as developed. Now that major planning for the alternative rail alignments and transit stations have been completed, I will add some comments to help you in making final selection of the locally preferred alternatives.

As an owner occupant of Marco Polo condominium, I have carefully followed the planning process as it developed in our neighborhood. In our area you held sessions at Ala Wai Elementary School (11-12-87), McCully/Moiliili Neighborhood Board (8-6-87 & 3-3-88) and at Marco Polo (1-21-88). Some of the major concerns I have as concerns expressed to me by some of the other residents are as follows:

1. How will the rail system, the proposed station and the escalators and/or stairs affect the aesthetic quality of our immediate surroundings.

2. The units closest to the rails (units 1, 2 and 3) are very much concerned about the loss of privacy and views. The stacked station means that there will be two levels of trains. The structures and the trains will obstruct the existing views. The passangers on the system will look directly into the lanais and rooms. The current privacy will be gone.

3. The current traffic and parking conditions are bad. Would the feeder buses and private cars coming to the the station to drop off passangers further congest the area? How will the buses turning around affect the area traffic? Will the already busy Isemberg Street or the less congested Hausten Street be used? Will the area be use for “park and ride”? Will the pollution in the area from bus exhausts increase?

4. Will people tend to congregate around the station causing potential concern for the people living in the neighborhood?

5. Will the noise of the passing trains be annoying?

I touched on the major concerns we have now. We hope that you can answer them to the satisfaction of those concerned. I certainly do not want to see relatively minor issues derail the transit system.
Sir, Sappal-

I would just like to let you know-

I am against Mass Transit, definitely.

I see no point standing or down, let take

But...

A much better solution would be greatly in-

A. more frequent service-

more frequent service on.

I would suggest we try getting buses on

and.

If Necessary means that stop.

I know that would be very 15 mins or so up.

Know that cannot be every 15 mins or so up.

Know that cannot be every 15 mins or so.

Can. This problem, I know, but anyway, London, etc.

At this point

I have given up on the bus because it

I know it takes a 20 min walk in may.

Bus service would be great. Please consider

Barbara K. Hend}
98-795 Naalii St.
Aiea, Hawaii 96701

May 8, 1990

Mr. Joseph M. Magaldi, Deputy Director
City & County of Honolulu
Department of Transportation Services
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

Honolulu Rapid Transit Development Project Public Comment

Thank-you for notifying me of the important AA/DEIS meetings being held on Tuesday, May 8 and Wednesday, May 9, 1990. I very much would like to attend these meetings, but find it impossible to do since I am leaving on a trip for the remainder of May, tonight.

In lieu of attending and speaking on the subject, I would request that the following written comments be utilized as appropriate in your review and development of the final EIS.

1. I would like to speak in favor of the development of the Honolulu Rapid Transit System. The exact route selection and technology utilized is not as important as establishing the system at the earliest possible "in-service" date. Personal preference, however, is for the Beretania/Alakea alignment downtown. The technology preference is elevated, single "rail" (monorail) to minimize aerial mass. Of course, maglev would be desirable over the long haul, but it may not be expedient.

2. The system should service the Commuter and the day traveller. If a route choice must be made to favor one or the other, I would prefer support of the commuter (higher usage). However, I believe that any of the routes identified could serve both the commuter and the day traveller as well as the visitor industry.

3. It is very important that the system support the "Professional Community" of commuters. These are commuters that work hours other than the normal 8:00 to 5:00 routine. The preferred methodology for serving these commuters is to ensure adequate parking (Park & Ride) at ALL suburban stations; particularly Pearl Ridge, Pearl City and those in close approximation to this area, not just Aloha Stadium. This is important so that those individuals unable to catch the shuttles running vertically, or not serving their neighborhoods, can still utilize the system. (Shuttles cannot economically run continuously from 4:00 a.m. to 1:00 a.m. at short intervals.) Personal car use of "park & ride" facilities also would provide a sense of security for individuals traveling during "off hours".

Mr. Joseph Magaldi  
May 8, 1990  
Page 2 of 2

4. The stations should be clean, safe and controlled by appropriate security personnel.

5. The vehicle schedules should be fast and often to encourage usage.


In summary, it is important to proceed at the quickest pace to ensure adequate traffic relief in the foreseeable future utilizing the Rapid Transit System. This is particularly true in light of the general public support expressed and funding measures passed by the legislature.

I very much appreciate you keeping me informed of the events leading to our successful deployment of the Rapid Transit System. If I may be of any support, or you have any questions concerning the above, please call me at 486-4976 (home) or 546-6203 (work) / 546-6208 (work fax). I will return to the Islands on June 1, 1990.

Sincerely,

[Signature]

Larry E. Lamberth  
ASME/IEEE Member
May 10, 1990.

Mr. Amar Sappai
Project Manager
Department of Transportation Service
630 South King Street, 3rd floor,
Honolulu, Hi. 96813

Dear Sir,

I hereby submit my copy of my talk at meeting in Salt Lake 5/9/90.

This is not an exact copy of my speech as I could not read what I had written. I am partially blind. I came from N.Y. to Hawaii 28 years ago for fresh clean air and no subway. I do not want the rapid transit monorail to go along Salt Lake Bivd. Having it there is an invitation to the criminal element quick robbery and jump on the monorail. I have been informed that the military do not want it on Salt Lake Bivd either. Our property values will decrease considerably as we sleep in the 2 bedrooms facing Salt Lake Bivd; it will also affect our pool with dust and dirt when rail transit cars passing and stopping; the people will make noise while waiting at the stop.

There are 13 floors affected 156 apartments plus a child care center where the children need quiet—this is a building.

The Sunset Lake View condominium, building A has the same amount affecting 350 apartments whose value will decrease. After paying up to $185,000.00, it is a shame. Foster Village is also in danger of unasked for visitors.

Will the fare be excessive; will the charge include buses?

We will still need a large amount of buses for short trips.

I prefer the Kaimuki Highway as the primary route. If we have to have the rapid transit with parking garages on Kaimuki with about 8 floors, the city can make money that way. On Salt Lake Bivd, it is not a good idea.

Thank you. I have added a few words as 5 minutes was not enough at the meeting.

Sincerely,

Mrs. Dorothy L. Lacklen
(Louise)
I concur with my wife, Dorothy K. Lavender's statement. I also spoke at the meeting. Her thoughts are those of the enclosed owners, tenants listed on the names of A & B building. I am on the board of directors and have spoken to them on this subject, most of them speak English poorly so asked me to include their comment for Nimitz Highway not Salt Lake Blve.

Sincerely,

Mr. Louis Lavender
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**Address Location:**
- A/YI FUJISHI TAKAWA: 3215 ALA ILIMA ST., #410, HONOLULU, HI, 96818
- A/YI ZAYER CHUNG: 147 AIALOA PLACE, KAILUA, HI, 96734
- A/YI HUN LUM LOUIE: 3215 ALA ILIMA ST., #404, HONOLULU, HI, 96818
- H/M ALVIN D. CALVIN: 3215 ALA ILIMA ST., #407, HONOLULU, HI, 96818
- JOHN S. REA: 3215 ALA ILIMA ST., #410, HONOLULU, HI, 96818
- CHARLOTTE J. LUD: 3215 ALA ILIMA ST., #501, HONOLULU, HI, 96818
- GERTHIE J. ZEENAID RAYOT: 3215 ALA ILIMA ST., #504, HONOLULU, HI, 96818
- H/M FRANCIS FANG: 1761 HONOLUA ST., PEARL CITY, HI, 96728
- GUARDIAN OF H/M KIDING J. REID: 3215 ALA ILIMA ST., #510, HONOLULU, HI, 96818
- H/M WAH KAI WONG: 1011 I-A-2 ALEWA DRIVE, HONOLULU, HI, 96817

**Location Coordinates:**
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- H/M WAH KAI WONG: (359 06501 1, 0.335000, HONOLULU, HI, 96817)

**Additional Notes:**
- All addresses are in Honolulu, HI, with corresponding phone numbers and locations.
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Mr. Amar Sappal  
Project Manager  
Rapid Transit Development Division  
Department of Transportation  
650 South King Street  
Honolulu, HI 96813

Dear Mr. Sappal,

As a resident of Foster Heights Villas, I am against having the Rapid Transit route down Salt Lake Boulevard. I am in favor of the Kamehameha Highway route.

[Signature]

Resident Name  

[Signature]

Resident Name

A-3 1380 SALT LAKE BLVD.  
Resident Address  

SM-96  
Date
May 22, 1990

Ron Lim
1184 Kuhakai St.
Honolulu, HI 86816

Joseph Magaldi, Deputy Director
Department of Transportation Services
650 S. King St.
Honolulu, HI 96813

Dear Mr. Magaldi,

I am writing to express my support for developing a mass transit system in Honolulu. My family lives in East Oahu. We already spend at least one hour each day commuting to and from work. We've ridden the express bus, but find that it doesn't substantially reduce commuting time, unless one rides during non-peak hours (for example, between 5:00 and 6:15 a.m.) because the bus must still make its way through the volume of cars on Kalanianaole Highway. With new developments and more people moving into the area, the traffic will only get worse. A good mass transit system will provide a real alternative to driving a car and keep traffic problems from getting any worse. I fully support the City's efforts to bring mass transit to Honolulu.

Sincerely,

[Signature]
May 23, 1990

Joe Magaldi, Deputy Director  
Dept. of Transportation Services

Dear Sir,

We need mass transit and we need it now! I would just like to state that I support the City's effort to relieve our traffic problems and to build a light rail system.

Traffic congestion does not appear to be getting any better, and something must be done before we hit gridlock.

Thank you for your work to help Oahu's residents.

Sincerely, [Signature]
Mr. Amar Sappal  
Project Manager  
Rapid Transit Development Division  
Department of Transportation  
650 South King Street  
Honolulu, HI 96813

Dear Mr. Sappal,

As a resident of Foster Heights Villas, I am against having the Rapid Transit route down Salt Lake Boulevard. I am in favor of the Kamehameha Highway route.

[Signature]  
Resident Name  

16 May 1976  
Date

[Signature]  
Resident Name

4780 Salt Lake and C-14  
Resident Address
May 21, 1990

Mr. Joseph M. Magaldi, Jr.
Deputy Director
Department of Transportation Services
City & County of Honolulu
650 South King Street - 3rd Floor
Honolulu, Hawaii 96813

Attention: Julie Tavares

Dear Mr. Magaldi:

I support the City's Rapid Transit Plan and your department's efforts to develop railed mass transit contained within that plan.

Sincerely,

[Signature]

Name

Address

City Honolulu, Hawaii 96819
May 8, 1990

Ms. Faith Miyamoto
Honolulu Rapid Transit Development Division
720 Kapiolani Blvd.
Honolulu, Hawaii 96813,

I'd like to make a few comments regarding the current Rapid Transit situation for inclusion in the current public hearings records.

Since the Environmental Impact Statement draft includes two options calling for NO rapid transit system, I'd like to address my remarks to that end.

Several points:
1) The billion dollar cost will, as history has shown, run way over budget by completion. Are there any caps on that amount? If not, why not? And how about time frames. We all know about Hawaiian time.
Any guarantees there?
2) With this amount of money, numerous other forms of mass transit can be achieved. I am a bus rider from Hawaii Kai. I take the Express Bus and usually get to and from work in just over a half hour. Door to door! If a larger fleet of buses was installed, and bus-riding made more convenient, it could solve the problem, I'm convinced. Especially if more people and/or companies staggered their work hours.
3) People in mass numbers will NOT ride the train. Only current bus riders, by and large. Hawaii car drivers are married to their cars and will continue to drive, regardless. Just look at how many cars on the freeways have one person in them. This will be especially true should they have to park blocks away from the train, leave their cars in open, unguarded areas, and/or have to take shuttle buses to get to the train. Never happen - especially in Hawaii.
4) What advantage is rapid transit to people like me who would have to take a bus to get to the train to get to work. I'd rather just stay on the bus.
5) Another SERIOUS consideration which has been made painfully clear of late. Our infrastructure is rapidly decaying - just as is the case in many Mainland cities. Kalanianaole Highway and Bishop Street are caving in. Major water pipe and other work is needed now. Our basic road system is in need of a major overhaul.
It makes much more sense to me to get that handled first — it's going to have to be done anyway — before we embark on a one billion dollar plus political and job-related windfall. If we start building the rail system AND have to repair major arteries at the same time — now you're talking chaos!

6) The general public is totally unaware of the visual eyesore this system will impose on Oahu — especially in or near older residential and commercial areas, not to mention landmark areas.

Hawaii is NOT a major metropolitan area. We're a big little city. Yes, we've got transportation problems, but please reconsider.

I know it's politically appropriate to take the federal money and run now. But it will NOT best satisfy the long-range needs of our island.

Thanks for your attention, and aloha.
May 20, 1990

Mr. Joe Magaldi  
Deputy Director  
Department of Transportation Services  
650 S. King Street  
Honolulu, Hawaii  96813

Dear Mr. Magaldi:

This letter is written to voice my support for the City’s rapid transit plan. I have been following the issue carefully and have attended every public hearing on the matter.

Alternatives to fixed rail, such as more busses or a ferry system, just don’t seem feasible. The argument that people will not leave their cars to ride a fixed rail system is flawed. I have read in several articles on the subject that people seem to feel that riding a rapid transit system is easier and “more respectable” than commuting on a bus.

I feel that the research done on the environmental aspects has been adequate. Also, it appears that the City has taken great care in planning the route so that it has a minimal impact on homes and businesses.

Keep up the good work!

Arapata McKay
May 10, 1990

Mr. Amar Sappal
Project Manager
Rapid Transit Development Division
Department of Transportation Services
650 South King Street
Honolulu, HI 96813

Sir:

I am against having the Fixed Rapid Transit route down Salt Lake Boulevard.

I have lived at Foster Heights Villas since buying there twelve years ago. My townhouse apartment faces Salt Lake Boulevard and my master bedroom window would face the center of proposed terminal #5. If the fixed rapid transit is built down Salt Lake Boulevard, my view would change from skyline and mountains to concrete and beams. People exiting and waiting at the terminal would look directly into my bedroom. Of course, I could keep my drapes and windows closed, thus lose both the view and the trade winds.

The proposed terminal #5 would be less than 75 feet from my front door, and the rail passengers would be getting off and cutting through our apartment complex. Strangers cutting through the property pose a real security problem.

Parking is very limited around our Foster Heights Villas. I feel some people would parking in our complex for lack of street parking. Or they would fill up the next door small public park parking or park on the shoulder of the road. None of these options are satisfactory. Proposed terminal #5 is too far away from the riders thus most people would drive to the terminal.

The noise and light from the terminal would be detrimental. These two factors would greatly alter my present home life and setting. I don't want to listen to trains, people, and cars all night long. I don't want a flood light shining into my home all night long.

The proposed terminal #5 will increase the traffic in this area, which is already taxed to the limit.

If the proposed route down Kamehameha Highway were selected, it would not effect the same number of homes. The residents in Foster Village area could benefit from the fixed rapid transit without the noise and the associated problems.
A fixed rapid transit down Kamehameha Highway would be more beneficial to the passengers and business along Nimitz. I would think, although the Kamehameha highway route is a little longer, it would be easier to build because there is not the hills found along Salt Lake.

In conclusion, I am strongly against putting a fixed rapid transit down Salt Lake Boulevard. I am in favor of building rapid transit down Kamehameha highway.

Concerned,

PAT MEDEIROS

Pat Meireiros
May 8, 1990
TO: Department of Transportation Services
City and County of Honolulu
FROM: Anne Miller
RE: Proposed Honolulu "El"

My name is Anne Miller, and I have been a resident of Honolulu, Kailua and Kaneohe since 1960. I have watched with interest the pro-rail and anti-rail controversy, from the days of the Governor's Conference on Videotex, Transportation and Energy Conservation in the early '80s to the current bipartisan push for the construction of an elevated fixed rail system.

The proposed rail system is a very costly gamble. Can you imagine how much 1.4 billion dollars actually is? For example, with half that much money, we could buy every household in the state a $2,000 computer terminal and printer. Will people use our new "Honolulu El?" It will only go an average of 20-35 miles an hour, and you will probably have to take the bus to get to and from it. I suspect that what will happen in Honolulu is what has happened in city after city on the mainland: most current bus riders will use the Honolulu "El", some current express bus riders will revert to their cars because the train is slow and the transfers a drag, and the rest of the public will continue to use their cars. Remember the great number of people who take their kids to school, go shopping on their way home from work, etc.

It's too expensive and permanent a gamble. Let's try some innovative, less expensive, probably more effective alternatives we haven't attempted first! Flexible transportation management systems, expanded bus services, dial-a-ride services, computer assisted door-to-door ridesharing, para-taxis driven by commuters, taxi-sharing, jitneys, grade separated express buses, minibuses for out in the country and up the mountains. Any and all of these have a better shot at reducing the number of single occupancy cars on the road than the Honolulu "El."

A Note to the STATE: You folks should have agreed to pay a dollar figure rather than 1/3 of construction costs, since that way construction overruns, typical for rail systems, would have come from the city's pockets.

A Note to the CITY: If you think H-3 took a long time due to the environmental impact challenges, just wait till they start building the Honolulu El! Property owners to be displaced will keep it in the courts for decades.

A Note to the PUBLIC: The State and City administrators have known for at least 7 years that innovative, cost-effective alternatives to a fixed rail system exist and could have been put in place. However, they chose instead to do nothing. Traffic congestion became so bad that the public now is desperate for relief, and asks for the only thing they know about: rail. You, the public, and most of the state legislators, have not been fully informed about the cost-effective alternatives to fixed rail.

I challenge the city and state administrations, and the media, to inform the public about those alternatives.

Thank you for your attention.
1306 Uila Street  
Honolulu, HI 96818  
May 18, 1950

Mr. Amar Sappal, Project Manager  
Department of Transportation Services  
650 South King Street, 3rd Floor  
Honolulu, Hawaii 96813

Dear Mr. Sappal:

This is written in opposition to a fixed rail mass transit system for Honolulu. It seems to me that in most metropolitan areas where people have had a choice, they have chosen to ride in their cars rather than mass transit. I believe that would also be the case here in Honolulu. It would be more productive to build more highways and legalize jitney and other small transportation services rather than waste the money on a fixed rail system.

If, nevertheless, a rail system is built, I would think that it should go down Salt Lake Boulevard rather than Kam Highway so as to be close to where people live. Unless it is convenient for people, it will surely not be used very much.

Yours truly,

Joseph Monaco
Mr. Joseph M. Magaldi, Jr.  
Deputy Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street  
Honolulu, HI 96813

21 May 90

Dr. Mr. Magaldi,

As a resident of Mililani Town, I would like to express my support and endorse the Mass Transit System proposed by the City and County of Honolulu.

I have lived in Mililani Town for the past 15 years and have seen the growth of this community and the resulting increase in traffic. I feel that the proposed Mass Transit System will be a tremendous help to all of the residents of central Oahu.

I asked for your continued efforts to implement this much needed system for the City of Honolulu.

Very Truly Yours,

[Signature]

CLIFFORD MORIKAWA  
94-301 Kaolani St  
Mililani, HI
May 22, 1990

Mr. Joe Magaldi
Deputy Director
Department of Transportation Services
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

At the rate traffic is increasing, Oahu will have total gridlock in the very near future.

A rapid transit system is a necessity. It's unrealistic to think more buses or more roadways will solve our traffic woes. I support the City's proposal to bring rapid transit to Honolulu.

Sincerely,

Kendrick Mun
May 22, 1990

Ronald Mun
1912 Manoa Road
Honolulu, HI 96822

Joseph Magaldi, Deputy Director
Department of Transportation Services
650 S. King St.
Honolulu, HI 96813

Dear Mr. Magaldi,

I am writing in support of the City's efforts to develop a rapid transit system for Honolulu. We have all suffered with Honolulu's terrible traffic problems. The time is now to move forward with the development of rapid transit before Honolulu is totally gridlocked.

Sincerely,

[Signature]

Ronald B. Mun
May 22, 1990

Mr. Joe Magaldi, Deputy Director
Department of Transportation Services
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

GRIDLOCK! This is something we all may face in the very near future.

I live along the corridor of the proposed fixed rail route, and I assure you my family and I wholeheartedly support the City's plan for rapid transit.

Please don't give up until it becomes a reality. We need a good fixed rail system in Honolulu.

Sincerely,

Patrick H. Murata
1376 Ala Kapuna Street
Honolulu, Hawaii 96814
May 8, 1989

I am Frank Malbach, a resident of lower Makiki. I am opposed to any form of rail transportation, especially as planned within the scope of the Honolulu Rapid Transit Development Project. It is the wrong kind in the wrong place at the wrong time at the wrong price. And worse yet, serving the wrong people. Now, let us define our terms.

Wrong kind means it's above grade and is certainly a scenic polluter. Just imagine going down Kapioani Blvd. and instead of being shaded by beautiful trees we are shaded by an elevated railway.

Wrong place means it is going to destroy the middle of Waikiki. Why replace the only successful bus route that's paying its own way with an ugly elevated structure right down the middle of Kuhio Ave. Of course, if I owned a condo at Four Paddles or Royal Kuhio, I'd love to have a permanent year round train set in my front yard. And, if I owned the Prince Kuhio Hotel or the Hawaiian Resort, I guess I'd enjoy the impact of an elevated railway in front of my property.

Wrong time means it's when we poor taxpayers are looking for ways to meet the high cost of living. Our ever loving politicians come up with another way to increase our taxes!

Wrong price means we can't afford one billion dollars for something that won't serve most of our residents and certainly won't solve our traffic woes.

Wrong people means its route favors far too many visitors and far too few local residents. In addition, the routing will take a lot of riders from the buses; not add riders.

If the time and money spent promoting this fantasy were spent in trying to improve traffic flow by just a few simple, low cost and in some cases, free steps, we would be better off by far.

How about ride sharing? The city and the state could set a perfect example by mandating that all employees shall share a ride with someone. For a start, the mayor could be picked up by the managing director. That would take one vehicle off the road and even add a parking place right in front of Honolulu Hale. And isn't it strange that both champions of rail transit won't be able to use it? And, the governor too. He can walk to his office and for longer trips he still has his limousine! Maybe a better idea yet would be for the mayor to use his van and pick up other residents on his route from Makiki Heights to downtown just like a jitney.

The city and the state are equally at fault. Neither has made any great effort to try to reduce traffic congestion by fully evaluating bus and paratransit systems in conjunction with restrictions on highway use during commuting hours. Both should appropriate generous funding for promotional programs relating to establishing privately owned and operated carpools, vanpool, dial a ride and jitney services.

I, a resident of Makiki, a community that will not be served by rail, suggest and plead that the powers that be, reconsider this rail program and instead increase bus service and evaluate and implement anything that will reduce traffic congestion with far less impact in increasing taxes.

[Signature]
May 22, 1990

Mr. Joseph M. Magaldi, Jr.
Deputy Director
Department of Transportation Services
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

I support the City's proposed mass transit plan. This project must proceed as an important part of our transportation program for the future.

With the projected increase in population on Oahu, and the new development taking place in Ewa, we will need alternatives to move people from one end of the island to the other.

There is not enough land to build more highways so mass transit offers the best alternative.

We can't afford not to build a transit system.

Yours truly,

[Signature]
MR. AMAN SAPPAL, Project Manager
DEPT. OF TRANSPORTATION SERVICES
650 S. KING ST., 3RD FLOOR
HONOLULU, HI 96813

RE: Proposed Mass Transit MTG
ON May 9, 1990

1. Thank you for the meeting at
   Aliamanu Intermediate School.

2. We strongly support a
   "SALT LAKE BLVD" route because
   it would serve residents in all
   areas (Salt Lake, Aliamanu, Foster Village)
   whereas a "KAM HWY" route would
   entail residents to travel "out-of-
   the vicinity" of their homes to get to
   the HWY.

3. Now let's build it. Enough talk? Yours truly
   Neighborhood 18 BD Resident
May 21, 1990

Mr. Joe Magaldi, Deputy Director
Department of Transportation Services
650 S. King Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

I understand that its time now to either act or forget any new mass transit system for Honolulu. I, and all of my friends, say "LET'S GET THIS SHOW ON THE ROAD!!!"

We don't need another survey, study or anything else to get this project started. We don't need to waste more time and zillions of dollars like what happened to the H-3 Freeway project.

I realize that final routes have not been decided upon, but let's at least make a final commitment to get the system started.

You and your staff have made a valiant effort, so far, to present the City's proposals to the public; the Legislature is providing funding, now its time to begin!

Most sincerely,

Philip Nixon
(Currently a bus rider)
Mr. Amar Sappal  
Project Manager  
Rapid Transit Development Division  
Department of Transportation  
650 South King Street  
Honolulu, HI  96813

Dear Mr. Sappal,

As a resident of Foster Heights Villas, I am against having the Rapid Transit route down Salt Lake Boulevard. I am in favor of the Kamehameha Highway route.

[Signature]
Resident Name  
14 May 90  
Date

[Signature]
Resident Name

4280 Salt Lake Blvd. E-26  
Resident Address  Honolulu, Hawaii  
96816
May 21, 1990

Mr. Joseph M. Magaldi, Jr.
Deputy Director
Department of Transportation Services
City & County of Honolulu
650 South King Street - 3rd Floor
Honolulu, Hawaii  96813

Attention: Julie Tavares

Dear Mr. Magaldi:

I support the City's Rapid Transit Plan and your department's efforts to develop railed mass transit contained within that plan.

Sincerely,

[Handwritten] Sana Numazu

[Handwritten] 91-463 Papipi Road

[Handwritten] Ewa Beach, Hi  96706

[Handwritten] Name

[Handwritten] Address

[Handwritten] City, Zip Code
May 21, 1990

Joseph Magaldi, Director of Mass Transit
Honolulu Hale
500 S. King St.
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

The city needs a mass transit system to relieve congestion from the overloaded freeway system we are forced to travel. Please convince those in power just how urgent this need is.

This is the only hope those of us in east Oahu have of having less hassal going to and from work. This will get cars off of the freeway.

Yours,

Rob Oldnall
Mr. Amar Sappal  
Project Manager  
Rapid Transit Development Division  
Department of Transportation  
650 South King Street  
Honolulu, HI 96813 

Dear Mr. Sappal, 

As a resident of Foster Heights Villas, I am against having the Rapid Transit route down Salt Lake Boulevard. I am in favor of the Kamehameha Highway route. 

Richard E. Olson  
Resident Name  

5/16/90  
Date  

[Signature]  

[Signature]  

1250 Salt Lake Blvd C-16  
Resident Address
Mr. Amar Sappal  
Project Manager  
Rapid Transit Development Division  
Department of Transportation  
650 South King Street  
Honolulu, HI 96813

Dear Mr. Sappal,

As a resident of Foster Heights Villas, I am against having the Rapid Transit route down Salt Lake Boulevard. I am in favor of the Kamehameha Highway route.

Resident Name  

Date  

Resident Address  

1-20 6280 SALT LAKE OWP.
May 21, 1990

Mr. Joe Magaldi
Department of Transportation
650 S. King Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi,

I use the Bus every day, even if I am retired and 82 years old. I have watched the traffic change over the years and it is going to get worse.

I support the Mayor's plan for rapid transit and hope the City will start as soon as possible. We have talked about it so long and now is the time to act.

Sincerely,

Hanako Ozawa
2916 Date Street #16-H
Honolulu, Hawaii 96816
May 10, 1990

Joe Magaldi
Deputy Director
Department of Transportation Services
650 S. King Street, 3rd Floor
Honolulu, Hawaii 96813

Re: Proposed Fixed Rail Transit System

Dear Mr. Magaldi:

I am writing in regard to the fixed rail transit system which may in the future come to pass in Honolulu. I feel that this system would not benefit the citizens of this island - we the citizens who would have to pay for this most unattractive monstrosity!

We live in Hawaii, a very beautiful place, and I feel like many others, that a fixed rail system would take away from that beauty and the scenery and serenity of island living.

To build this fixed rail transit system, the streets would have to be torn up and not to mention the effect it would have on traffic flow, which is already a horrible nightmare.

I sincerely believe that what we need to do is get more busses, including more express bus service, and greatly improve our bus service, as our busses are overcrowded and don't run often enough.

I think that we should forget the fixed rail transit system and the alternative would be to provide a better bus system and a ferry from Hawaii Kai to downtown and a ferry from Pearl City to downtown.

Sincerely yours,

Rosm Parales
May 22, 1990

Mr. Joe Magaldi  
Deputy Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street  
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

This is to support rapid transit for Oahu. The traffic problem is ridiculous and there is no end in sight. Something must be done soon and there does not seem to be a better idea than some kind of rapid transit system.

If the system is good, people will use it. No one should expect rapid transit to be the answer to all traffic problems. It will take sacrifice and commitment by all commuters to really make a difference. However, rapid transit at least will give commuters another alternative to driving.

Sincerely,

Elaine Park

Mrs. Elaine Park  
96-1623 Kiawe Street  
Aiea, Hawaii 96701
May 22, 1990

Mr. Joseph Magaldi, Deputy Director
Department of Transportation Services
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

Honolulu is getting to be too big a city to not have a mass transit system. With all the new development and increased population on the island, it doesn't make sense to expect that putting a few extra buses on the same roads that are now nearly at capacity with everyone's cars will do anything to reduce traffic congestion. What will help ease our traffic problems is a good mass transit system that encourages people to leave their cars at home.

I support the City's efforts to get such a system in place.

Sincerely,

Rossi Peralta Patton
West Loch Estates
91-1031 Kauno'a Street
Ewa Beach, Hawaii 96706
MR. ANAR SAPPAL, PROJECT MANAGER
Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813
May 13, 1990

Dear Mr. Sappal:

Please add this response to written testimony on mass transit, which is due in your office on May 23, 1990. The enclosed information sheet, which I authored and distributed to all Foster Village residents, explains my position. IF A FIXED RAIL SYSTEM IS INSTALLED, PLEASE SELECT A KAM HIGHWAY ROUTE RATHER THAN THE ALTERNATE SALT LAKE BLVD. ROUTE.

Additionally, RAPID TRANSIT BENEFITS FOR HONOLULU DO NOT JUSTIFY THE HUGE OUTLAY OF FUNDS. Please consider these alternate solutions to our traffic congestion:

1. Give significant tax incentives to businesses to relocate out of the central core to areas such as Mililani or Ewa Beach.
2. Decentralize state and city governments; FAX machines, cellular phones, and computers negate the necessity of people being in close proximity to each other.
3. Use feeder buses to deposit riders to central locations to transfer to express buses with specific dedicated highway lanes and routes. Tour buses could augment city buses during peak commute hours.
4. Eliminate senior citizen bus pass usage during peak hours.
5. Legalize jitney or other small transportation services.
6. Search for a legal way to limit the number of vehicles on Oahu, including rental cars. Reduced traffic in April seemed to coincide with a decrease in tourists for that month.
7. Improved education systems would encourage neighborhood school attendance and reduce the need for private schools.

I am sure that there are many other creative solutions to the traffic congestion problem. Thank you for your consideration of all points of view.

Sincerely,

[Signature]

Enclosure
ATTENTION FOSTER VILLAGE RESIDENTS

On May 9, 1990 a hearing was conducted at Aliamanu Intermediate School on mass transit. Much of the testimony centered on the proposed fixed transit choices of a Salt Lake Blvd. route versus a route along Kam Highway past the Arizona Memorial, military bases, and airport.

The chairman of our Neighborhood Board testified in favor of a Salt Lake Blvd. route. The presidents of both community associations testified in favor of mass transit with the FVCA president supporting the Kam Highway route, and the EFVCA president supporting either route.

YOU SHOULD BECOME AWARE OF THE IMPACT AN ELEVATED MASS TRANSIT SYSTEM WOULD HAVE ON FOSTER VILLAGE.

1. NOISE: Noise impact was acknowledged to be substantial; a sound barrier will be necessary. Picture the barrier, hear the dull roar, and consider how it will impact our schools and quiet village. With winds shifting to a Kona direction, the entire village may be subjected to this noise.

2. TRAFFIC CONGESTION: The proposed station will be at the corner of Bougainville Dr. and Salt Lake Blvd.; no parking is planned. Consider the current traffic congestion and visualize the added traffic of possible transit riders searching the neighborhood for parking spaces or others dropping off family members at the station. Exit time from the village will be increased.

3. IMPACT ON SCHOOLS: Consider the impact of construction on Makalapa Elementary School, Radford High School, and Aliamanu School.

THE DEADLINE TO SUBMIT WRITTEN TESTIMONY IS 4:30 PM, MAY 23, 1990.
ADDRESS YOUR TESTIMONY TO: MR. AMAR SAPPAL, PROJECT MANAGER
DEPARTMENT OF TRANSPORTATION SERVICES
650 SOUTH KING STREET, 3rd FLOOR
HONOLULU, HAWAII 96813

PLEASE WRITE TO MR. SAPPAL, EVEN IF IT IS ONLY A NOTE, TO SUPPORT A KAM HIGHWAY ROUTE, OR NO MASS TRANSIT AT ALL. ASK THAT OTHER ALTERNATIVES BE CONSIDERED, SUCH AS TAX INCENTIVES TO BUSINESSES TO MOVE TO OUT-LYING AREAS OR THE LEGALIZATION OF JITNEY OR OTHER SMALL TRANSPORTATION SERVICES. THE LAST EIGHT MASS TRANSIT SYSTEMS BUILT WERE FAILURES: IT IS YOUR MONEY AND YOUR NEIGHBORHOOD.

ALOHA;

Janice W. Pechauer
F.V. Resident since 1968
Ronalyn B. Peralta
94-1049 Kahualani St.
Waipahu, HI 96797

May 22, 1990

Mr. Joe Magaldi, Deputy Director
Dept. of Transportation
650 S. King Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

I support the proposed rapid transit system for the City & County of Honolulu. Our highways are now overcrowded and it will become worse in the future if government officials do not do something about it. I think a fixed-rail mass transit system like what you have proposed, will not only reduce traffic but will also contribute to a better quality of life.

Sincerely,

Ronalyn B. Peralta

Ronalyn B. Peralta
Sherry Perry  
41-950 Kalanianaole Hwy.  
Waimanalo, Hawaii 96795  

May 10, 1990  

Joe Magaldi  
Deputy Director  
Department of Transportation Services  
650 S. King Street, 3rd Floor  
Honolulu, Hawaii 96813  

Re: Proposed Fixed Rail Transit System  

Dear Mr. Magaldi:  

I heard about the proposed fixed rail transit and I have a difficult time believing that the Governor and Mayor of Honolulu would actually be in favor of such a stupid proposal.  

Obviously this elevated and underground monster would only be to service the tourists going from the airport to the already disgusting Waikiki. And to add insult to injury I and the many people who reside here will have to pay for it. I ask you now, can you think of anything more absurd than this?  

Why don't you instead try to figure out how our bus system can be improved? We certainly need more Express busses to service the people on the Windward side of the island. Have you ever been in a traffic jam in the early morning, and, have to stand up in a bus for 2 hours? Or going home after a long day at work only to find that you have to stand again on the way home? Not too fun, I can tell you. What about the local people. When is the so called Governor and Mayor going to be in favor of something to help our people? Soon we won't be able to
TO: Amar Sappal  
Project Manager  
Department of Transportation Service  
650 South King Street  
Honolulu, Hawaii 96813

FROM: Richard Pollock  
500 University Ave., #2209  
Honolulu, Hawaii 96826

RE: The Isenberg Mass Transit Station Mysteries

May 20, 1990

There are several mysteries about the design of the Isenberg station that deserve examination. If the ridership estimates are correct, the Isenberg station seems to be grossly undersized with the result that Mōiliili neighborhood and traffic through it will be adversely affected. Conversely, the small Isenberg station without provision for bus-train or auto-train transfers may be inadequate if the projected mass transit ridership estimates are overstated.

Impact of the Underdesigned Station on the Nearby Residents

The overhead Isenberg station is typical of many other stations on the proposed rail system. The rails will be entirely overhead, unless a short segment through downtown is placed underground. Moreover, these overhead tracks will be over existing streets, most of which are arterials. Since the tracks are over the street, the station platforms are also overhead, resulting in rather large overhead structures at each station. The Isenberg station will be particularly large and high since the spur track to the University has to placed next to the main track that ends shortly beyond the Isenberg Station.

However large the overhead station structure, the overhead platforms have to have access to and from the street. This combination of a large overhead station structure, large support columns and connections to the street raises several questions in the context of the very crowded and congested Isenberg–Kapiolani intersection above which the station is to be located. A complex of escalators and elevators (required by law for the disabled) have to connect the overhead platforms with each other and to the street level. Presumably a set will be required for each side of Kapiolani if the flow of traffic on Kapiolani is not to be delayed by long stop light intervals to permit street crossings of embarking or disembarking passengers.

Even if the problem of traffic delays from pedestrian crossings were ignored, putting the escalators or elevators only on one side of Kapiolani would require that the station is elevated even more to provide for an additional level below the tracks to permit passengers to cross under the tracks to use only one set of
escalators or elevators. But any extra elevation for the tracks will cut off even more mountain views of Marco Polo residents on the first four or five floors.

Since it is claimed that no private residential property will be condemned for the rail project it is a mystery where the unavoidable set, or sets, of escalators and elevators will be located to provide access to the street. There are wall to wall, and wall to sidewalk residences on the Mauka side of Kapiolani. Thus, there is just no room for such connections to the platform on the Mauka side of Kapiolani unless residences are condemned and torn down. If the Station is elevated to permit a level for passenger crossing under the tracks one set of escalators and elevators could be placed in the area in front of the Marco Polo condominium now occupied by trees and driveways. (Since the Marco Polo parking structure abuts on the sidewalk these station features will have to be Ewa of the main driveway entrance to the Marco Polo.) Since the sidewalk has to be kept open with room left for the supporting columns of the station and since at least 10 feet will be required for bus parking (more on this later) the escalators and elevator will end up close to the front door of the Marco Polo. Additional space in this area will be required if a ticket booth is placed at ground level near the escalators.

Lack of Provision for Adequate Turnouts and Loading Areas

A set of related mysteries relates to the lack of adequate provision for offstreet turnouts, off loading and on loading areas for the many buses and autos (for "kiss and ride" riders) that would materialize at this station if the projected ridership originating in East Honolulu materializes. The need for such intermodal transfers is apparent for virtually all stations except perhaps for those right downtown. But the need is particularly great at the Isenberg station since it is the Eastern terminus of the rail line. It is projected that all of the feeder buses and autos with "kiss and ride" riders all the way from Kapahulu to Hawaii-Kai will connect with the rail system at the Isenberg station. One has only to consider the provision for such bus-train and auto-train transfers provided at the Western terminus near Waipahu to appreciate the deficiency of design at the Isenberg station if the projected ridership from East Honolulu is really expected. Mass transit stations with similar transfer roles in other cities with new systems usually have off-street transfer facilities.

Because of the lack of provision for bus-train or auto-train transfers at the station, at least one lane of Kapiolani will be lost to auto traffic at peak hours. For example, in the morning all the new express buses bringing in passengers from East Honolulu will come off the Kapiolani freeway off-ramp and, together with other feeder buses coming from Date street converge on the Isenberg station. Considering the number of buses involved, and
the time it takes for passengers to exit from the bus, these numerous feeder buses will preempt the far right lane of Kapaolani from Date to Isenberg. This bottle neck will cause auto traffic to back up even more than it does already each morning at this spot. Since all the buses and autos will be affected by this traffic bottleneck it is possible that the estimated average time savings of 10 minutes per trip will be eaten up. Was this bottleneck problem considered when the optimistic travel time savings estimates of ten minutes a trip were made?

It is planned that most of the feeder buses serving the Isenberg station will proceed to the Ala Moana shopping center before turning around for the outbound trip. It is obvious that any large volume of new bus traffic will compound the peak time congestion problem at the worst intersection in town, namely the Kalakaua-Kapolei-Atkinson intersection. The pylons and other structures required to place the tracks across that intersection will further complicate the peak use traffic congestion problem at that intersection. The new convention center proposed for that corner will further compound the congestion. If this congestion backs up to Isenberg it will be even more difficult for the feeder buses to unload quickly at the Isenberg station.

Additional congestion problems will be generated by the transfers at Isenberg in the evening as the buses and autos picking up passengers transferring from the train line up on the Makai side of Kapolei; again one lane will be preempted because of the lack of adequate turnoffs or bus loading areas. The plans apparently call for just two bus parking spaces next to the Marco Polo. (As noted earlier, together with the support columns for the station and the escalators and elevators, the bus parking spaces off the street will result in a significant encroachment into the front yard of the Marco Polo.)

If adequate provision is not made for the "kiss and ride" riders, that traffic will spillover onto the neighboring streets as well as feeder buses under alternative routings. This could result in much churning of traffic in the Moiliili area with associated noise and air pollution problems.

Considering the density of buildings in the area it is not surprising that all day parking lots such as will be available at the western terminus station near Waipahu, will not be available at the Isenberg Eastern terminus of the rail line. However, this doesn't mean that auto users living in East Honolulu will still not try to retain some of the advantages of auto commuting while saving on downtown parking fees; they will drive in from where ever and park on the streets or in the recreation areas in Moiliili before getting on the train downtown. After taking cognizance of these adverse impacts on the Moiliili neighborhood, it is ironic to note that those residents
leaving near the Isenberg station will be expected to pay special "benefit" assessments to pay for the mass transit operating deficit. These are special site specific property taxes that are supposed to recoup the "benefits" of leaving near a train station!

Broader Mysteries about the Relation of the Inadequate Station and the Suspect Ridership Estimates

It might be retorted that the adverse impact on the Moiliili neighborhood will be minimal since there won't be much new bus or auto traffic generated by the Isenberg station, in spite of its Eastern terminus status. If this turns out to be true, an even larger mystery is raised; how is the mass transit rail ridership going to reach the optimistic projected levels if significant numbers of new mass transit riders from East Honolulu do not materialize? A large number of auto commuters from East Honolulu would have to use the rail system, with the Isenberg station being the transfer point, if congestion on the Koko head side of the H-1 freeway is to be alleviated. It is claimed by the City that tens of thousands of commuters will be diverted from their cars to the new rail system.

Perhaps the explanation for the apparent underdesign of the Isenberg station is that it is not underdesigned. This would be the case if the City Department of Transportation did not really believe their own ridership projections. In this case, the small Isenberg station is adequate is spite of being shoe-horned into such a small congested area, with no takings of property on either side of Kapiolani. But such a comforting outcome on the station adequacy issue would only mean that the claimed overall economic and financial feasibility of the rail system would be undermined given the minimal shift of auto commuters from their cars to Mass transit.

Summary of Isenberg Mysteries

How is the Isenberg station going to be shoe-horned into such an inadequate congested space without condemning and tearing down residences and/or having an adverse effect on the neighbors of the station?

Won't the army of feeder buses and "kiss and ride" riders converging on the Isenberg station from East Honolulu have a serious adverse impact on Moiliili?

Is the underdesign of the Isenberg station required by the need to keep capital expenditures from becoming even greater than the community is willing and able to pay for? Is similar underdesigning typical of the whole mass transit plan?

If the cramped Isenberg station is adequate to handle its role as the terminus and transfer point for East Honolulu, isn't this
another indication that the proposed mass transit ridership increases have been exaggerated by the City?

cc Councilman Gary Gill
Councilman Lee Wai Doo
Mike Shroma, Neighborhood Board #8
Testimony in Support

of 50% Federal Funding For a Mass Transportation System in Amounts Equal to Matching Funds Collected by A .005 Temporary Increase in the State General Excise Tax AND Private Sector Contributions.

Provided the language on page one line fifteen of SB179 SD1 HD1 is amended to read "for a reasonable time not to exceed January 2001" or something to that effect be inserted making the intent clear that the tax increase is on a temporary basis to fully support the rest of the bill and the small temporary tax increase as a good faith gesture to help our government leadership build Hawaii a better transportation future.

The small temporary tax increase is an extra five cents on ten dollars or five hundred on $100,000 dollars. I support a .005 tax increase but ask in return for a system that Hawaii can be proud to say is the best the world has. This is not an easy task and not a task suited for normal bureaucratic channels. As this project has already seen unprecedented participation from Democrats and Republicans, Federal, State, City, County and the general public I'm encouraged that perhaps Hawaii will be able to take a future lead in public Transportation. But I know it won't be easy and will require a solid commitment to excellence.

In the design and intent of the legislation before us I have these suggestions to offer for your consideration:

1) In the language a SPECIFIC stop date be substitutes for the phrase "for a reasonable time". The public finds it hard to believe that the government will ever find a reasonable time to stop a tax.

2) That a money collected for the system be also directed into encouraging solar research and technology relevant to mass transit and private automobiles.

3) That incentives for solar automobiles be linked to this bill and that no further attempts to provide tax and fee disincentives for independent vehicles be disproportionately aimed at middle and lower income earners.

4) That the issuance of bonds be made available to state residents/business as a way of providing private sector funds.

5) That a way of providing community Co-Op shares be made available in order to give the regular riders and the community a strong interest and incentive in the profit and loss of the system. Dividends shares could be made available to neighborhood boards and/or regular riders. The formula could be agreed upon and adjustable by votes.

6) That the system NOT be run at a deficit, ultimately dependent on further government taxes or funding.

7) That each feeder system have the potential to serve as a test ground for new technology.

8) That the government organize an annual Honolulu based TRANSIT-FAIR (to include April 22, Earth Day each year). To focus on Hawaii's commitment to this common concern, serving to bring proposals, competition, industry commitments and media attention we would otherwise lose.

I encourage all residents who ar committed to Hawaii's better future to join our government leaders and take positive responsibility in supporting this project through the long tedious process of funding, design, adjustment, approval and implementation.
Martha Racoma-Lee
95-111 Kipapa Drive #A-107
Mililani, HI 96789

May 22, 1990

Mr. Joe Magaldi, Deputy Director
Dept. of Transportation
650 S. King Street
Honolulu, HI 96813

Dear Mr. Magaldi:

I'm in support of the rapid transit system proposed for the City & County of Honolulu. I'm tired of driving to work everyday from Mililani to Downtown, which takes about 50 minutes each way, and with the high gasoline prices, expensive car repairs and high parking fees. Commuting on rapid transit will not only save me money but also will get me to and from work faster.

Sincerely

[Signature]

Martha Racoma-Lee
May 20, 1990

Mr. Al Thiede
Director
Department of Transportation Services
Honolulu Municipal Building
650 S. King St.
Honolulu, Hawaii

Dear Mr. Thiede,

I just wanted to let you and Mr. Joe Magaldi know that I am 100% behind the mass transit project. Please let me know what I can do to convince the legislators to support what their constituents want.

Sincerely yours,

[Signature]

Sandra Ramos

98-1566 Hoomahilu St.
Aiea, Hawaii 96782
May 19, 1990

Mr. Joe Magaldi
Deputy Director
Dept. of Transportation
650 South King St.
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

I would like to voice my support for the City's plan for rapid transit.

I have looked at the alternatives to fixed rail and, frankly, I don't feel a ferry system or more busses are the answer.

We can't afford more studies while traffic comes to a complete halt. We need action now.

Yours truly,

[Signature]
May 21, 1990

Mr. Joseph M. Magaldi, Jr.
Deputy Director
Department of Transportation Services
City & County of Honolulu
650 South King Street - 3rd Floor
Honolulu, Hawaii 96813

Attention: Julie Tavares

Dear Mr. Magaldi:

I support the City's Rapid Transit Plan and your department's efforts to develop railed mass transit contained within that plan.

Sincerely,

Mrs. Alice Ross
Name

91-463 Papipi Pl.
Address

Ewa Beach, HI 96706
City Zip Code
MAY 08, 1990

RITTEN TESTIMONY ON MASS TRANSIT:

HAWAII NEEDS TO MAKE MASS TRANSIT MORE ATTRACTIVE,
AND
HAWAII NEEDS TO MAKE AUTOMOBILE OWNERSHIP LESS ATTRACTIVE.

IMPROVE THE BUS SYSTEM BY DOING THE FOLLOWING.

LOCAL PEOPLE NEED A BETTER BUS SYSTEM WITH FREQUENT BUS STOPS. I DON’T
THINK MANY PEOPLE WOULD TAKE ONE SHUTTLE BUS TO THE LIGHT RAIL, AND THEN HAVE
TO TAKE ANOTHER SHUTTLE BUS AT THE OTHER END. THE PRESENT BUS SYSTEM HAS NOT
GROWN WITH THE POPULATION NEED IN THE PAST 10 YEARS. CITY AND STATE POLITICIANS
SHOULD GET OUT OF THEIR CARS AND RIDE THE BUSES FOR A WHILE TO SEE WHERE
IMPROVEMENTS SHOULD BE MADE.

FIRST OF ALL, DOUBLE THE SERVICE ON SOME ROUTES, ESPECIALLY THE ROUTES
THAT THE TOURISTS TAKE TO GO TO THE ARIZONA MEMORIAL, ALOHA SWAP MEET, AROUND
THE ISLAND JOYRIDING, ETC. THESE BUSES ALL LEAVE ALA MOANA PACKED FULL OF
TOURISTS AND WHEN THEY GET DOWNTOWN THERE IS NO ROOM FOR MORE PASSENGERS. I
PROPOSE THAT EVERY THIRD COUNTRY BUS (50, 51, 52, ETC.) BE AN “EXPRESS”
WITH NO STOPS AT PLACES SUCH AS ARIZONA MEMORIAL. PEOPLE WHO LIVE IN MAKAHA
SHOULD NOT HAVE TO STAND ON A BUS FOR 1 1/2 TO 2 HOURS. THESE “EXPRESS”
BUSES SHOULD RUN ON WEEKENDS AS WELL AS WEEKDAYS. IN FACT, THE SERVICE ON
WEEKENDS AND HOLIDAYS SHOULD BE NO LESS THAN THE SERVICE PROVIDED DURING THE
EEK ON ALL ROUTES AS IT SEEMS MORE PEOPLE ARE OUT AND ABOUT RIDING THE BUSES
IN THESE DAYS.

WHY DOESN’T THE MTL PROVIDE “EXPRESS” BUSES TO THE ARIZONA MEMORIAL AND
OTHER TOURIST PLACES TO ALLOW LOCAL PEOPLE ACCESS TO THE REGULAR BUSES?

CHARGE SENIOR CITIZENS AT LEAST SOME FEE EVERY YEAR, AND MAKE THE PASS
RENEWABLE EVERY YEAR. THERE ARE FAR TOO MANY PEOPLE WITH FREE PASSES RIDING
THE BUSES, ESPECIALLY AT RUSH HOURS. IN FACT, WHY NOT MAKE A MORNING AND
AFTERNOON RUSH HOUR AND NOT ALLOW THE USE OF THE FREE (OR GREATLY DISCOUNTED)
PASS DURING THESE PERIODS. YOU WILL NEVER GET PEOPLE OUT OF THEIR CARS IF YOU
DO NOT PROVIDE THEM WITH AN ATTRACTIVE ALTERNATIVE, WHICH IS NOT A PACKED,
CROWDED BUS WHERE THEY HAVE TO STAND.

SOME OF THE DRIVERS NEED TO BE SENT TO “COURTESY SCHOOL”. I ONCE SAW
A BLIND WOMAN FALL DOWN THE STEPS AND THE DRIVER MADE ABSOLUTELY NO MOVE TO
ASSIST HER OR EVEN TO SAY ANYTHING TO HER. THEIR HERKY-JERKY DRIVING SEEMS
TO GET WORSE AS THE BUS GETS MORE AND MORE CROWDED AND I HAVE SEEN PEOPLE
THROWN TO THE FLOOR SEVERAL TIMES. THERE IS ABSOLUTELY NO EXCUSE FOR THIS.

ALSO, LATELY SOME DRIVERS SEEM TO BE SOMewhat “RELUCTANT” TO STOP AT BUS
STOPS TO PICK UP PASSENGERS. THIS HAPPENED TO ME TWICE MAY 5, 1990 WHEN THE
# 1 (KALIHI) WOULD NOT STOP FOR ME AND OTHERS (BUS WAS NOT FULL), AND A # 52
(ALA MOANA SOUND) FAILED TO STOP (ALSO NOT FULL). THIS HAS BEEN HAPPENING FOR
TOO MANY TIMES TO BE AN “ISOLATED INCIDENT”. WHAT ARE THESE DRIVERS TRYING TO
PROVE? THAT THEY DON’T WANT TO BE BUS DRIVERS?? THEN GET NEW DRIVERS.

A SPECIAL LANE FOR BUSES ONLY SHOULD BE PROVIDED SO THEY DO NOT HAVE TO
BE STUCK IN THE TRAFFIC WITH EVERYONE ELSE. IF YOU SHAVE AUTOMOBILE DRIVERS
THEY CAN GET SOMEWHERE FASTER ON THE BUS MAYBE THEY WILL LEAVE THEIR CAR AT
HOME AND TAKE THE BUS. BUT I FEEL THE BUS NOW PROVIDES POORER SERVICE THAN IT
DID JUST A FEW YEARS AGO. ALSO, WHERE ARE THE “PARK AND RIDE” WHERE DRIVERS
CAN LEAVE THEIR CARS AND RIDE THE BUS INTO DOWNTOWN HONOLULU. NO-ONE IN HIS
AT MIND WILL PARK THEIR CAR AND GET ON A SARDINE-LIKE PACKED BUS FOR A
NUISANCE-PARK RIDE TO/FROM WORK OR SHOPPING. THE BUS HAS TO PROVIDE A
ETTER SERVICE.

THE BUS SERVICE IN HONOLULU IS NOT EVEN COMPARABLE TO LARGE CITIES ON THE
MAINLAND IN MANY ASPECTS. ON SEATTLE BUSES, FOR EXAMPLE, YOU CAN TAKE YOUR
BICYCLE, AND KIDS CAN TAKE THEIR SKATEBOARDS, AND TRAVELERS CAN TAKE THEIR
LUGGAGE. DIDN'T THE BEACH BUS LET THE KIDS TAKE THEIR SURFBOARDS AT ONE TIME?
NO WONDER SO MANY PEOPLE NEED CARS.

WHEN I FIRST HEARD ABOUT THE LIGHT RAIL MASS TRANSIT SYSTEM
PROPOSED FOR HONOLULU I THOUGHT IT WAS A GREAT IDEA. HOWEVER, SINCE READING
MORE ABOUT IT I HAVE MY DOUBTS.

LET'S SEE, THE FIRST (ONLY?) PROPOSED SECTION WILL BE FROM WAIKIKI TO
PEARL RIDGE, WITH STOPS AT ALA MOANA, DOWNTOWN HONOLULU, THE AIRPORT AND ARIZONA
MEMORIAL. THIS SOUNDS LIKE ANOTHER TOURIST TRIP TO ME.

MAKE A NEW IMPROVED BUS SYSTEM FOR LOCAL PEOPLE AND FUND THE (PROPOSED)
LIGHT RAIL MASS TRANSIT WITH A TOURIST TAX AS I FEEL THAT THIS GROUP WILL BE
THE PREDOMINANT USER.

AUTOMOBILE OWNERSHIP/USAGE.

THERE ARE MANY THINGS THAT COULD BE DONE TO DISCOURAGE AUTOMOBILE USE.
HAWAII, IN MANY WAYS, "ENCOURAGES" OWNERSHIP/USE OF PRIVATE VEHICLES.

NO DRIVERS LICENSE SHOULD BE ISSUED UNTIL A PERSON IS AT LEAST 18 YEARS
OLD, AND, THERE SHOULD BE NO ON-SCHOOL PARKING FOR HIGH SCHOOL STUDENTS.

NO FREE AUTOMOBILE INSURANCE FOR ANYONE. ISSUE WELFARE FOLKS A BUS PASS.

NO .50 (THAT'S 50 CENTS) CAR REGISTRATION FOR MILITARY. THIS JUST CAUSES
RESIDENTS TO HAVE TO PAY MORE TO MAKE FOR THE LOST REVENUE.

SIGNIFICANTLY INCREASE CAR REGISTRATION COSTS FOR 2ND, 3RD, ETC. VEHICLE.

NO MORE VEHICLES PER FAMILY/RESIDENCE THAN NUMBER OF REGISTERED DRIVERS.

HAVE STRICTER VEHICLE INSPECTION - NO JUNKERS ON ROAD.

LOSE DRIVERS LICENSE FOR DRUNK DRIVING.

WHEN A CAR RENTAL COMPANY BUYS NEW RENTAL CARS DO NOT ALLOW THEM TO SELL
THEIR OLD RENTAL CARS IN HAWAII. MAKE THEM RETURN THE USED CARS TO THE MAINLAND
OR SELL THEM TO A FOREIGN COUNTRY.

DO NOT PERMIT THE MILITARY TO SELL THEIR USED CARS TO LOCAL RESIDENTS.
THEY MUST TAKE THEM WITH THEM WHEN THEY LEAVE, OR JUNK THEM.

ALLOW NO MORE NEW OR USED AUTO DEALERS TO SET UP SHOPS IN HAWAII.

"PRIVATE" MASS TRANSIT BY THE USE OF CAR POOLS, VAN TRANSIT, ETC.

CONTROL ENTRY INTO DOWNTOWN HONOLULU - NO MORE ON-STREET PARKING (THIS
WOULD FREE UP ANOTHER LANE FOR TRAFFIC). I LIVE DOWNTOWN AND THE AIR IS SO
FOUL DURING RUSH HOURS, AND THE CONGESTION IS HORRIBLE. PROVIDE SOME WAY TO
ROUTE THE TRAFFIC AROUND - NOT THRU - DOWNTOWN. DRIVERS ARE IMPATIENT, RUDE,
HONK HORN, ETC. IT SOUNDS, SMELLS AND LOOKS LIKE ANY MAINLAND CITY NOW.
TAKE A TIP FROM EUROPE - THEIR DOWNTOWNS ARE PEDESTRIAN ONLY ZONES. GRADUALLY CLOSE OFF STREETS DOWNTOWN TO TRAFFIC (MAYBE HAVE TO USE WINDOW STICKERS FOR DOWNTOWN ACCESS). LOOK AT SINGAPORE.

FINALLY, "BE KINDER" TO BICYCLISTS AND PEDESTRIANS. HAWAII IS IDEAL WEATHER TO BIKE OR WALK BUT IT IS BECOMING MORE AND MORE DANGEROUS TO DO EITHER AUTOMOBILES WILL NOT STOP FOR PEDESTRIANS EVEN IF THEY ARE IN THE CROSSWALK ON A "WALK" SIGNAL. CARS TURNING RIGHT (OR LEFT) ON A RED LIGHT PAY NO ATTENTION TO PEDESTRIANS. ARE THERE NO LAWS PROTECTING PEDESTRIANS?

HAWAII MUST ADMIT IT HAS A SERIOUS PROBLEM AND MUST TAKE SERIOUS STEPS TO DEAL WITH IT. I DO NOT FEEL HAWAII IS READY TO TAKE SUCH STEPS. BUILDING A LIGHT RAIL SYSTEM WILL DO NOTHING TO STOP HAWAII'S TRAFFIC PROBLEM.

ALOHA
ANN RUBY

225 QUEEN #8C
HONOLULU, HI 96813
524-1837 471-2006
May 9, 1990

Testimony At Public Hearing on Fixed Rail Rapid Transit.

Gentlemen:

I am totally against the concept of a fixed rail transit line in Central Oahu - Pearl City to Kahala. Such a system will fail due to the lack of ridership. The concept fails on the most point to a commuter - convenience.

Once a person gets into his car, he will not want to get out until he reaches work. It is just more comfortable, and private being in your car; even if it is bumper to bumper moving at a crawl than to change "vehicles" twice or maybe three times to get to work.

Redesign the system from where people are living or will have to live - Makaha to Pearl City - Haleiwa to Pearl City. Then have a very efficient mini van (12 to 15 people) express service into center core. Make it convenient so that people will leave their cars at home.

Cancel the proposed center core fixed rail system. It will be a tremendous financial disaster. A white elephant that generations from now will have to suffer taxes to pay for, if ever.

Thank you,

Bob Schieve
Helen Schlapak
1545 Molina Street
Honolulu
Hawaii 96818

15 May 1990

Mr. Amar Sappal, Project Manager
Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu
Hawaii 96813

Re: Proposed fixed transit route

On 9 May 1990, a hearing was conducted at Aliamanu Intermediate School on rapid transit. Much of the testimony centered on the proposed fixed transit choices of a Salt Lake Blvd. route versus a route along Kam. Highway past the Arizona Memorial, military bases, and airport.

Noise impact was acknowledged to be substantial; a sound barrier will be necessary. However, this is not my major concern. I am in favor of rapid transit and I believe that Hawaii is long past due in having such a system, however, I do have the following concerns regarding a possible station site at the corner of Bouganville and Salt Lake Blvd:

1. I reside in Foster Village and I take the Bouganville/Salt Lake Blvd. route six days a week during peak traffic hours, so I am very much aware of the amount of traffic at the proposed station site. Added to the vehicle traffic is the large amount of students who walk along, into and across both of the above named streets. I have witnessed numerous traffic accidents on both streets as well as at the intersection of Salt Lake Blvd. and Bouganville Dr. These accidents have involved vehicles colliding as well as students being struck down while in the cross walks and alongside the road.

2. In the near future a shopping mall will be constructed on Salt Lake Blvd. at the former Castle Park site; this will also add to the traffic flow on Salt Lake Blvd. More cars, more pedestrians, and possibly more accidents, add a fixed transit station to that and it becomes an accident waiting for a disaster.

3. The parking along Salt Lake Blvd. is inadequate for the two schools, Makalapa Elementary and Radford High School, and as yet there is no mention of a parking plan should the fixed transit station be located in that area. This then leaves Foster Village as the next most logical place for possible transit users to park their cars. Do we need that in a residential area already plagued by too few parking spaces?

I would ask that the Kam. Highway site for a transit station be given
full consideration as:

1. There would be little to no impact on the Makalapa Elementary and Radford High School regarding noise, construction, and added vehicle traffic.

2. The proposed Kam. Highway route goes past the Arizona Memorial, military bases, and airport (not to mention the swap meet!). These are areas that employ many people and are accessed by thousands of tourists daily, who would then find it quite simple to use the fixed transit system (and is that not a selling factor in getting people to "ride the rails"?).

3. With Aloha Stadium, plus open areas located along Kam. Highway would it not be easier for a transit rider to find a place to park his or her car?

4. There is far less pedestrian traffic along the Kam. Highway route than the Bouganville/Salt Lake Blvd. route, thus the potential for pedestrian/vehicle accidents would be reduced substantially.

I sincerely thank you for your attention regarding the aforementioned concerns, and I hope that the traffic problems on the corner of Salt Lake Blvd. and Bouganville Dr. will be studied more thoroughly and taken into consideration regarding the proposed station site.

Helen Schlapak
May 17, 1990

Dear Mr. Sappal,

I want to let you know my feelings about the proposed Salt Lake Fixed Rail Path.

First, during our May 10th neighborhood board meeting I got the impression that most of the board members were pushing for the rail to be on Salt Lake as opposed to Kam HWY. Mind you none of these persons live in direct line of the proposed rail system on Salt Lake.

I feel it would be a horrible mistake to put this system in an already congested area. I live in the back of Foster Village, and if using this system I would still have to get a ride to the front of the Village or find some place in the surrounding area to park my car...so it would seem silly to me not just to go to the Stadium park and ride. Salt Lake is a residential area this type of mass transit must be kept in an more appropriate area. BART in San Francisco is close to residential areas but it is not at all "in" any residential areas...no one wanted that in their front or back yard...it runs along the main highways...which is were our fixed rail mass transit system should run. It seems to me the people at the Ewa end of Salt Lake would use the Park and ride at the stadium and the Diamond head residents would use the Kiss and ride station proposed at Nimitz and Pualoa road.

PLEASE KEEP IT OFF OF SALT LAKE BLVD., another factor to consider is the three schools that this system would run by...with more traffic caused by the kiss-and-ride station at Boganville and Salt Lake the noise and safety factors would be horrendous.

Mr. Sappal, I thank you for your time and kind consideration in this matter.

Mrs. Lois Slayter
4337 Piikea Pl.
Hon., HI 96818 (808) 42208710
Although a member of Neighborhood Board #18, and the Board of East Foster Village Community Association, I am here tonight to offer my individual testimony.

I have attended the workshops and read the information that is available; I am strongly in favor of the Honolulu Rapid Transit Development Project.

I urge the City not to be distracted by reference to rapid transit systems that did not work elsewhere. I say this because to the best of my knowledge none of those systems have the unique corridor configuration that exists here in Honolulu. We have a unique opportunity for a successful rapid transit system.

For those who do not support the project because they say that they would not ride the Rapid Transit when built, I say even more reason to support it because thousands will ride it keeping the highways from becoming even more cluttered. That leads to another point. Some criticize the proposed system because they believe that it may not be a lot faster than the current commute. I ask them to consider how long the commute will be in ten years if we do not have the Rapid Transit.

We all notice the significant difference in commute times when school is out - whether it is public school, private school, or the University of Hawaii or all three. I ask that the Rapid Transit project make a special effort to meet the needs of our students who commute to and from school. If the Rapid Transit system only replaced the ones carrying our students, it would make an outstanding contribution to relieving the traffic problem.

Thank you for allowing me to give this testimony.

KENNETH E. SPRAGUE
Dear Mr. Sappal,

My wife and I are in agreement with the need for alternate forms of transportation and we do support the idea of MASS TRANSIT SYSTEMS. This, in spite of the fact that we are retired senior citizens and are able, therefore, to travel by private auto during other than peak traffic hours. During our working years, however, we were subject to the ever increasing traffic load on the roadways. For 25 years we have observed demand far exceeding solutions.

In the Salt Lake area, Neighborhood Board 18 testified in favor of a Salt Lake Blvd. route for the MASS TRANSIT SYSTEM. The Foster Village Community Association presidents supported the Kam Highway route.

We believe that an overriding consideration of route choice in this area are the FOUR SCHOOLS that exist between Foster Village and the Salt Lake Shopping Center area - Makalapa Elementary, Radford High School, Navy Hale Keiki School and Childcare Center and Aliamanu Elementary and Intermediate. Teaching and learning centers absolutely cannot co-exist with the massive construction program which will take place over many years and then the continuing disruption which will occur indefinitely.

We believe we owe the children of our community better than that. Continually, State and Local governments are increasing funding and other means to upgrade our educational system and environment. The Salt Lake Blvd. routing is in complete opposition to the overriding need of a better educational environment.

Do not allow any other factors, no matter how valid they may seem, political or economic, to deteriorate the educational environment which is so much needed and desired.

Sincerely,

Stewart & Nancy Stabile

CC: Romy Cachola, Mary Jane McMurdo, Norman Mizuguchi, Ray Graulty, Janice W. Pechauer, Frank Fasi, John Waihee, Arnold Morgado
Edward A. Stewart  
4280 Salt Lake Blvd. C-13  
Honolulu, HI 96818

May 5, 1990

Mr. Amar Sappal  
Project Manager  
Rapid Transit Development Division  
Department of Transportation Services  
650 South King Street  
Honolulu, HI 96813

Sir:

I am against having the Rapid Transit route down Salt Lake Boulevard.

I am a five year home owner at Foster Heights villas which borders Salt Lake Boulevard and Bougainville. The property is leasehold land of The Queen Emma Foundation.

After attending the informational meeting of 5/2/90 at Washington Intermediate School and obtaining all the facts, I strongly oppose building a major fixed rail rapid transit terminal point at Salt Lake/Bougainville. The proposed terminal would be less than 50 yards from my living room. I would both see and hear terminal activity daily from my home. Building the fixed rail system on Salt Lake will adversely affect my household in the following ways:

1. It would greatly increase the current noise level in the Foster Heights Villas townhouse complex. The noise will not only come from the fixed rail buses, but will come from an increase number of people driving, stopping, braking, honking, talking, radios, etc. while going to proposed terminal #5. Any wall built to control the fixed rail noise will alter the cool trade winds and adversely alter the open space view we now enjoy.

2. The proposed terminal #5 at Salt Lake would increase the number of cars in our area. Having a terminal located here would bring in cars searching for the limited on street parking. Current tenants living at Foster Heights Villas use Bougainville as the only on street parking. Parking on this street is already saturated. The increase in vehicle traffic would adversely impact the safety of the nearby Radford High School and elementary school. Both schools are very near to the proposed terminal #5.

3. The Queen Emma Foundation leasehold, Foster Heights Villas property would be adversely changed. Recently, the Queen Emma Foundation Board of Directors refused to sell the property to the current home owners at any price. The City's experts at the informational meeting expect the property values to go up if a fixed rail system is built adjacent to the property. Values would go up for both commercial and high density
property. Since our lease is good only for fourteen more years, it is very possible that the Queen Emma Foundation will drastically increase the lease fee and/or refuse to renew it. Either way the rapid transit system would be a windfall for Queens Foundation and a disaster for the current home owners.

4. It is expected that most rapid transit riders would be "dropped-off" at the proposed terminal #5. It stands to reason if one is driving to the terminal, driving an extra five minutes to a Kamehameha highway terminal would be more acceptable by most.

In summary, I am strongly against putting a fixed rapid transit down Salt Lake Boulevard. I am in favor of building rapid transit down Kamehameha highway.

Sincerely,

Edward A. Stewart
EDWARD A. STEWART
3/6/90
Mr. Lever Spafford

Just do it, now! Press Transit. Route it anytime, either Salt Lake Blvd or the Ion. Here, just do it, get on with it. I suppose roads transit.

Michael

*aloha*

Foster Village resident, since 1967!

Alfred T. Strick, Sr.
1413 C. Molehu
ATTENTION FOSTER VILLAGE RESIDENTS

On May 9, 1990 a hearing was conducted at Aliamanu Intermediate School on mass transit. Much of the testimony centered on the proposed fixed transit choices of a Salt Lake Blvd. route versus a route along Kam Highway past the Arizona Memorial, military bases, and airport.

The chairman of our Neighborhood Board 18 testified in favor of a Salt Lake Blvd. route. The presidents of both community associations testified in favor of mass transit with the FVCA president supporting the Kam Highway route, and the EFVCA president supporting either route.

YOU SHOULD BECOME AWARE OF THE IMPACT AN ELEVATED MASS TRANSIT SYSTEM WOULD HAVE ON FOSTER VILLAGE.

1. NOISE: Noise impact was acknowledged to be substantial; a sound barrier will be necessary. Picture the barrier, hear the dull roar, and consider how it will impact our schools and quiet village. With winds shifting to a Kona direction, the entire village may be subjected to this noise.

2. TRAFFIC CONGESTION: The proposed station will be at the corner of Bougainville Dr. and Salt Lake Blvd.; no parking is planned. Consider the current traffic congestion and visualize the added traffic of possible transit riders searching the neighborhood for parking spaces or others dropping off family members at the station. Exit time from the Village will be increased.

3. IMPACT ON SCHOOLS: Consider the impact of construction on Maka-lapa Elementary School, Radford High School, and Aliamanu School.

THE DEADLINE TO SUBMIT WRITTEN TESTIMONY IS 4:30 PM, MAY 23, 1990.
ADDRESS YOUR TESTIMONY TO: MR. AMAR SAPPAL, PROJECT MANAGER DEPARTMENT OF TRANSPORTATION SERVICES 650 SOUTH KING STREET, 3rd FLOOR HONOLULU, HAWAII 96813

PLEASE WRITE TO MR. SAPPAL, EVEN IF IT IS ONLY A NOTE, TO SUPPORT A KAM HIGHWAY ROUTE, OR NO MASS TRANSIT AT ALL. ASK THAT OTHER ALTERNATIVES BE CONSIDERED, SUCH AS TAX INCENTIVES TO BUSINESSES TO MOVE TO OUT- LYING AREAS OR THE LEGALIZATION OF JITNEY OR OTHER SMALL TRANSPORTATION SERVICES. THE LAST EIGHT MASS TRANSIT SYSTEMS BUILT WERE FAILURES: IT IS YOUR MONEY AND YOUR NEIGHBORHOOD.

ALOHA,

Janice W. Pechauer
A.F.V. Resident since 1968
Joseph Strona
702 6th Avenue
Honolulu, HI 96816

May 22, 1990

Mr. Joe Magaldi, Deputy Director
Dept. of Transportation
650 S. King Street
Honolulu, HI 96813

Dear Mr. Magaldi:

I support the building of a light-rail rapid transit in Honolulu to relieve the traffic congestion in the city. It is about time that the city and state officials have finally realized that the only workable solution to our worsening traffic is either above or under the existing freeways and streets.

Sincerely,

Joseph Strona
Councilmember Neil Abercrombie  F  37
City Council
City and County of Honolulu
Honolulu, HI 96815

Dear Mr. Abercrombie:

To say the least, a lot of us ordinary citizens were very disappointed when you came to the Public Hearing held at the State Capitol, said your piece in support of the fixed-rail transit system and then walked out without bother ing to stay to hear any of the comments from the public. It just seemed to confirm the old attitude of most politicians, "You elected me to office and I know what is best for you and this is it!"

Most of us are so damned fed up with the TV commercials by Fasi, Waihee, Dan Inouye and Lex Brodie telling us what we need that your presentation just added to our ire! You people act as though the rest of us don't have a single brain cell in our skulls. Even the AA/DEIS was devoted almost exclusively to extolling the virtues of the fixed-rail system without saying for or against any options to the system. It certainly leaves one wondering who is paying off and who is getting paid off for pushing the fixed-rail system!

If you had stayed around, you would have heard some very eloquent speakers from your district who were not in favor of the system as proposed and some not at all. But, then, you have apparently made up your mind that we must have the system whether or not it costs you the next election! I must tell you that the speakers from your district against the system were roundly and loudly applauded by a large percentage of the audience. If you don't believe me, ask Gary Gill. He had the courtesy to stay to the end of the meeting and listen to both the pros and cons for the system! We were so happy to have a chance to express our sentiments by applauding those speaking against the system that the moderator threatened to lose the meeting if we did not restrain from applauding. It was the first and only chance we've had to express any sentiment one way or the other in contrast to all the pro TV programs so can you blame us?

When I came home I mentioned to my wife that you spoke at the meeting. She ask if you were for or against it. I told her that you spoke for it and she said, "In that case, I wouldn't vote for him even if we were in his district!"

You politicians here in Hawaii are just like the ones in Washington, DC - if you've got a problem, just throw money at it and it will go away! No wonder we rank right up at the top of the
of the list of states paying the most in taxes and are be-
coming known as a tax hell! No wonder Hawaii is becoming so
expensive tourists are going to Mexico, Australia, the Car-
bean, etc. rather than coming here! It is also little wonder
that it now requires that both parents in a family must work
outside the home to pay for rent or to own a home! Further,
a lot of us retirees and other people on fixed incomes are be-
ginning to wonder if we can afford to continue to live in Hawaii!

Can you tell me why so little publicity is given to such meet-
ings as the one held at the Capitol last night? I would have
been completely unaware of it if Councilmember Morgado had not
been kind enough to send me information concerning it. Such meet-
ings never seem to be advertised in the newspapers and we
only read about them in the newspapers when a reporter writes
an article after the meetings are all over. The only conclusion
we can come to is that the public is not really wanted at the
meetings because they may rock-the-boat and the newspaper stories
would present the desired comments on the meeting if only the
government side of the subject was to be presented.

Mr. Abercrombie used to consider you as being a fighter for
your constituents rights and wished that we had more people
like you in government! However, the political power that has
been brought to bear to grant waivers to height and density
regulations for buildings in order to get "free" convention
centers irregardless of the environmental impact and the traffic
congestion of these projects leads us to believe that you are
becoming just another typical politician. Your apparent support
for the fixed-rail transit system with it's environmental im-
 pact on our city and the great possibility that it will become
a huge liability makes us wonder all the more. We have a good
mass transit system now and it can be made a great one for a
lot less than a billion dollars!

Many of the citizens at last nights meeting had a lot of good
suggestions - some new and some old - on how to improve traffic
here on the island. Even if we proceed with the mistake of
building a fixed-rail system, many of these ideas should be put
into effect to cure a lot of our traffic problems for it will
be many years before the rail system is ready to operate. Many
of the ideas have been used very effectively in cities on the
mainland. Why not here?

Sincerely,

Cecil R. Suit

cc:
Gov. Naihe
Mr. Fasi
Councilmembers
Sen. Inouye
Mr. Masa'di
Etc.
R. V. Taibbi
1312 Olina Street
Honolulu, Hawaii 96818

117
2 I: 57

21 May 90

DEAR MRS. SA↓:

I am opposed to a mass transit system because I think it will be under-used by our citizens.

Specifically, I do not endorse a route along Salt Lake.

Within a mile there are three schools along Salt Lake, and to... a public library.

Foster Village is glutted by parked cars when there is a major event at the Aloha Stadium.

The route should be along Kamehameha while it would impact less on residential areas.

Yours truly,

R. V. Taibbi
Resident of Foster Village June 1969
May 21, 1990

Mr. Joseph M. Magaldi, Jr.
Deputy Director
Department of Transportation Services
City & County of Honolulu
650 South King Street - 3rd Floor
Honolulu, Hawaii 96813

Attention: Julie Tavares

Dear Mr. Magaldi:

I support the City's Rapid Transit Plan and your department's efforts to develop railed mass transit contained within that plan.

Sincerely,

[Signature]

Name: [Signature]
Address: 3030 Laaula Terrace
City: Honolulu, Zip Code: 96813
May 12, 1990

Mr. Joe Magaldi
Deputy Director
Department of Transportation Services
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

This is an island state with limited resources. We can't just keep dumping more and more vehicles onto our freeways.

More busses will not relieve the congestion on the highways. People will not leave their cars home to ride the bus--but it has been shown that they will use a good rapid transit system.

Please keep up the good work. I strongly support the City's rapid transit plan.

Sincerely,

[Signature]
May 22, 1990

Mr. Joe Magaldi, Deputy Director
Department of Transportation Services
City and County of Honolulu
Honolulu, Hawaii 96813

Dear Sir:

I have commuted from Mililani Town to work for the past 20 years and have noticed the gradual increase in traffic flow. Mililani Mauka, Waieele, Kapolei, and other housing developments will surely add to the heavy traffic.

I am in favor of the proposed rapid transit system and am hoping for its early completion. Major traffic congestions are already occurring very frequently.

Sincerely,

GEORGE T. TAMASHIRO, P.E.
95-411 Ikaloa Street
Mililani Town, Hawaii 96789
May 23, 1990

Mr. Amar Sappal  
Project Manager  
Department of Transportation Services  
650 South King Street, 3rd Floor  
Honolulu, HI 96813

SUBJECT: Honolulu Rapid Transit Development Project  
Comments to Alternative Analysis/Draft Environmental Impact Statement

Dear Mr. Sappal:

My name is Ronald M. Tanaka, a retired private citizen. I was formerly general manager of (SIDA) of Hawaii, Inc. for eleven years having served in that capacity from 1972 to 1976 and again from 1979 to 1986. During my tenure, many hours were personally expended at Honolulu International Airport and I became well acquainted with the private sector ground transportation segment of the industry.

Based on my many years of experience and thorough knowledge of management and operations, I would like to convey some of my comments and ideas to the City relative to the rapid transit project.

1. Current Bus System Operations

Based on data of TheBus System Fact Sheet, FY 83 to FY 89, pertinent information relative to the operations of the current bus system is shown below:

<table>
<thead>
<tr>
<th>ELEMENT</th>
<th>FY 83</th>
<th>FY 89</th>
<th>% CHANGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>No. of Busses</td>
<td>395</td>
<td>475</td>
<td>+ 20.3%</td>
</tr>
<tr>
<td>Total Passengers</td>
<td>74,191,000</td>
<td>74,192,000</td>
<td>0.0%</td>
</tr>
<tr>
<td>Total Revenues</td>
<td>$18,304,000</td>
<td>$18,617,000</td>
<td>+ 1.7%</td>
</tr>
<tr>
<td>Total Op. Costs</td>
<td>$52,238,000</td>
<td>$64,268,000</td>
<td>+ 23.0%</td>
</tr>
<tr>
<td>Op. Deficit</td>
<td>$33,934,000</td>
<td>$45,651,000</td>
<td>+ 34.5%</td>
</tr>
</tbody>
</table>

Based on TheBus, On-Board Survey, November 1986, the percent distribution of riders are shown by time periods for a typical weekday:
Letter to Mr. Sappal  
May 23, 1990  
Page 2

<table>
<thead>
<tr>
<th>TIME PERIOD</th>
<th>RIDERS</th>
<th>PERCENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Start of 9 AM</td>
<td>48,873</td>
<td>21.3%</td>
</tr>
<tr>
<td>9 AM to 2 PM</td>
<td>63,713</td>
<td>27.6%</td>
</tr>
<tr>
<td>2 PM to 6 PM</td>
<td>76,740</td>
<td>33.5%</td>
</tr>
<tr>
<td>6 PM to End</td>
<td>40,293</td>
<td>17.6%</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>229,618</strong></td>
<td><strong>100.0%</strong></td>
</tr>
</tbody>
</table>

It is also noted that express bus service were provided for 3,553 riders, or 1.5% of all riders, during the morning peak hours and 3,630 riders, or 1.6% of all riders, during the afternoon peak hours. The express bus totals for the day were 7,183 riders, or 3.1% of all riders.

The above data clearly indicates a very costly and inefficient bus service. Why this bus service is permitted to continue "as is" is very questionable. Who is responsible for establishing new policies to reduce costs and increase efficiency and ridership?

2. Private Paratransit Services


Extracted information from the AA/DEIS show:

a. The only mention of paratransit services in the report is the Handi-Van System. Planned improvements to the system through FY 94 includes the supplementary use of taxicabs to reduce costs through competitive bidding.

b. The City & County of Honolulu had adopted a Private Enterprise Participation (PEP) policy conforming to UMTA policies encouraging public sector participation in public transportation. A copy of the PEP policy would be sincerely appreciated.
After reviewing the presentation of the bus operations relative to the No-Build, TSM, and as a feeder for the rail system, it is my opinion that the conclusions are not based on facts and are very unrealistic. The selection of the TSM showing an all-bus system makes the so-called experts appear like amateurs. It would have been more factual and realistic if the poor performance of the current bus operations were acknowledged.

Projections based on the bus system supplemented with paratransit will reduce capital requirements, minimize operational subsidies, increase frequency of service, reduce travel time and ridership, and reduce vehicular congestion of our highways. By using paratransit today, we can try to reduce traffic congestion from now to when the fixed guideway system becomes operational. Also, we can have a feeder system in operation now to connect with the bus trunk lines to make service more efficient.

Advantages of paratransit as supplementary services are:

a. Substantial reduction in capital. Purchases of busses not required since private industry will provide their own equipment.

b. Substantial reduction in operational costs measured by cost per vehicle-hour or vehicle-mile.

c. Proper utilization of the right passenger capacity vehicle based on varying operational parameters: number of passengers on each route, varying ridership during the day, weekends, holidays, etc., cost per passenger, service frequency, and timeliness of service.

d. The number of busses required can be limited to cover ridership during off-peak hours, or core period. Contracts with the private sector can be made to cover overloads during the peak periods.

3. Use of Taxicabs

I believe it is appropriate to support the use of taxicabs for the following reasons:
Letter to Mr. Sappal
May 23, 1990
Page 4

a. If cost is the only factor, taxis can provide the least cost per rider up to 5 miles (from origin to destination) compared to any other ground transportation service, regardless of the number of riders.

b. The current share-ride taxi law limits the vehicle passenger capacity to eight. If this law is amended to a vehicle passenger capacity of fifteen, then, the cost per rider up to 10 miles will be lower than any other ground transportation service.

c. No other ground transportation service can provide more frequent and timely service with less travel time.

d. There are at least 1,300 taxicabs on Oahu to provide this supplementary services. They can begin service almost immediately. With the employment situation today, it would be most difficult to hire drivers, especially if time and numbers are the determining factors.

I want to make it very clear that there is no intention whatsoever to reduce the number of busses nor their employees. There are plans now, however, to increase the current bus fleet to 600 by FY 95. Why? The results are very predictable: more costs with no increase in ridership.

In conclusion, I want to say that I have no doubts whatsoever that a fixed guideway system will be necessary. I can visualize, with the supplementary use of paratransit, especially taxis, we can reduce the vehicles on our highways, and have ridership exceeding 300,000 per weekday. On the other hand, if the system is to depend solely on the bus system as feeders, my prediction is that Honolulu will be listed with the other transit projects that failed.

Very truly yours,

Ronald M. Tanaka
94-1015 Lelepuu Place
Waipahu, HI 96797
May 22, 1990

Mr. Joe Magaldi  
Deputy Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street  
Honolulu, Hawaii 96813  

Dear Mr. Magaldi:

I would like to express my support for rapid transit on Oahu. It's nice to see the Mayor and Governor actually agree on something. That alone is a sign that the rapid transit idea has merit.

Add my vote to those in favor of a rapid transit system. I hope we see the City and State come through by working together to make rapid transit a reality.

Sincerely,

[Signature]

2255 Apoepoe Street  
Pearl City, Hawaii 96782
May 21, 1990

Mr. Joseph M. Magaldi, Jr.
Deputy Director
Department of Transportation Services
City & County of Honolulu
650 South King Street - 3rd Floor
Honolulu, Hawaii 96813

Attention: Julie Tavares

Dear Mr. Magaldi:

I support the City's Rapid Transit Plan and your department's efforts to develop railed mass transit contained within that plan.

Sincerely,

Leanne M. Tanouye

[Signature]

Name

94-1469 Hale Pl.

Address

[Handwritten]

City

[Handwritten]
May 21, 1990

Mr. Joseph M. Magaldi, Jr.
Deputy Director
Department of Transportation Services
City & County of Honolulu
650 South King Street - 3rd Floor
Honolulu, Hawaii 96813

Attention: Julie Tavares

Dear Mr. Magaldi:

I support the City's Rapid Transit Plan and your department's efforts to develop railed mass transit contained within that plan.

Sincerely,

CLARENCE TSUZUKI

Name

428 Kalakaua Ave

City

Honolulu, HI 96817

Zip Code
Dear Mr. Seppal,

Only recently we have learned that two options for routing the proposed pipeline transmission system around Pearl Harbor, i.e., either along Salt Lake Boulevard or along the Arizona Memorial, Military Base, and Airport. (Kan Ki-Kei)

The purpose of this letter is to strongly recommend against the construction of such a system along Salt Lake Blvd. We live in the Salt Lake end of Foster Village within a couple hundred feet of that now major avenue.

Our chief concern with a route in that area centers on noise and traffic congestion.

The residents in this area are already subjected to the roar of traffic on that section of H-1 which passes between Rainbow High School and the Salt Lagoon. The noise of traffic on Salt Lake Blvd is in itself sufficiently disturbing.
age of this, we must endure the noise of high-flying helicopters as well as some fixed-wing aircraft. Then there are the city buses, the lawn mowers, barking dogs, and myriad other noises which permeate every neighborhood.

To complete this litany, we must add the noise of aircraft taking off at Honolulu Airport which during April and October is very distracting.

Neither should we forget that between September of 1984 and Mid-1985, the residents in this area were daily exposed to the noise related to the development of the residences along Kapolei Place and Kamehameha High School of Stadium Drive.

We have little faith in a sound barrier even were one erected. In our opinion, it may serve to be little more than an expense. And, the impact upon the concentration of students attending Kahului High School and Makaha Elementary School along the road, hardly commensurate with traffic congestion just like that between the Stadium and Koggerville Drive.
ready. Check - a block with traffic partic-
ularly during the school year and at
rush hour. Salt Lake Blvd. has been and
is badly in need of widening and improved
traffic control systems. It is not in need of any-
thing else which would increase vehicular traf-
carrying capacity.

As we understand it, there is a proposal to
establish a passenger terminal at Salt Lake
Blvd./Rosemont Drive. If the route is selected,
and that no parking space is planned to save
the feed-in passengers at that point, the pro-
posal is ridiculous (* the absence of parking)
facilities.

The west end of Easter Village, during the
school year is already plagued with an over-flow
of Radford student searching for parking space
We are daily disconffited as students leave
their cars in our driveways, our crosswalks,
and on occasion in our intersections - all
despite occasional police intervention.
A passenger terminal as pictured would
only exacerbate this problem and would save
y to gridlock local traffic which already approaches saturation.

If there must be a fixed-rail system, let it be as close to the Military Base and Airport Complex as possible. These are the major work centers/desinations in the area; hence, passengers should be enticed/deterrred as near to them as possible. To do otherwise only complicates their onward travel and adds to congestion upon the secondary streets in the area.

It should also be noted that many of the people in the Foster Village-Ala-marine area work at the bases and would not be heavy rail users, thereby minimizing the need for a feeder terminal immediately adjacent to these residential areas.

Although none of us is a traffic engineer, it seems to me that an elevated rail could rather easily be erected over the highway.
seen the stadium and the elevated section of Mintry. Although it would create a noise problem for the people in that area, it should be borne in mind that many of them are military—here for two or three years and not a lifetime. It is neither for these military people to vote here.

Now, the residents East of Helene Stream will be affected if or out with either routing.

Aside the need for a fixed-rail system we have not been shown that the marginal benefit to be gained is or will be anywhere commensurate with system cost.

It is the writer's firm view that until this State, this County and, yes, the entire world takes truly effective steps to moderate or otherwise limit population growth, all of our hopes, after-the-fact, rail- based efforts to keep the supply of infra-structural
It is our understanding that during the 50's, the population of the State grew at the rate of 1.7% per annum and that the number of autos grew at the rate of 4% per year. This transit is merely attacking the resultant effects of this basic problem. No effort is being made, to our knowledge, to even address, much less remedy the root cause: Too Many People (in Desolate).

Perhaps we ought to be looking at measures to limit population influx; be it from immigration, refugees, or otherwise.

2. We should be taking drastic steps to limit the number of cars by making it very expensive for people to own more than two of them. The state has the licensing authority to do this forthwith.
By copy of the letter, our
acted representative, are asked to do
their utmost to spare us the miseries-
the environmental miseries— which we
very strongly feel will be the
concomitants of the
Construction and operation of a
rail system at our very door step.

Very sincerely,

Thomas E. Weeks

Capt, U.S.N. Retired.

Subscribing to the foregoing Comments are:

Elsie C. Venia 1016 Lachea St. (Fosterville)

J. B. Shute

Muriel S. Shuteville

Hedars F. Shalayay 1013 Lachea Place Eastville

Mai Cheng Kim

Janet K. Martinez

Yong C. McKenzie

Claude E. Cheng

Cecle Cheng

Yong O. La

Tatone M. Medina

Geo Stockland

Ina Fotey

James A. Jackson

Dynia Elgav

214-329 Kehwani St. Waipu, HI 96797

214-329 Kehwani St. Waipu, HI 96797

94-515 Leakea St. HI 96818

1655 Kamalii St. Kona, HI 96817

4444 Lachea St. Honolulu, HI 96815

4429 Lachea St. Honolulu, HI 96815
Copy to: Goo Kaibee
Mayer Fasi
Rep. Tom O'Chamuna
Sen Norm Minusuchi
Council Mem Donna Kim
Pres, Foster Village Community Assn
Dear Sir:

I just wanted to tell you & all for your rapid transit program. It may cost some now but it will be worse if we don't get new transit alternatives underway. I like the idea of getting the private sector to pay for the major cost - sell the air rights! Everyone else does it.

Keep up the good work.

Pat Pavlid
153-1 Locke St
Kailua
May 18, 1990

Sir:

My wife and I have been residents of Foster Village since 1970. We were appalled to hear that Salt Lake Blvd, is being considered as a route for the proposed mass transit system.

Kindly accept this letter as our disapproval of such a proposal for the following reasons:

1. Noise Impact (schools and quiet residential section to be considered).

2. Traffic congestion (already congested with no planned parking - dangerous intersections crossing for pedestrians which include school children.


If there must be a mass transit system route it on Kamehameha Highway which is already geared for heavy traffic; and much more available to the military bases and their marines of civilian employees also more available to the International Airport, all of those mentioned are main traffic generators.

Respectfully submitted for consideration:

TED E. VOLBERDING
1389 Uila St
Honolulu, HI 96818

PATRICIA M. VOLBERDING
1389 Uila St
Honolulu, HI 96818
May 22, 1990
Wallace Y. Watanabe
91-7906 Kauno'a Street
Ewa Beach, Hawaii 96706
(Work) 531-3711

Mr. Joseph M. Magaldi, Jr.,
Deputy Director
Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Re: Mass Transit System

Mr. Magaldi:

I purchased a house in West Loch Estates in January of this year. I haven't moved yet because of the distance. The house is beautiful, but the commuting is horrendous. I need to leave the house before 5:30 A.M. to get into town in approximately 25 minutes. If I left after 5:30 A.M., it would take an hour or more because of the congestion on the road. Frustration is the word for the traffic.

An efficient mass transit system is needed soon. Mass transit system would definitely relieve the congestion and even alleviate pollution from thousands of automobiles on the road.

Parking fee in town, if you can find one, is also reaching intolerable levels. Mr. Magaldi, we need a mass transit system NOW!

Sincerely,

Wallace Y. Watanabe
May 23, 1990

Mr. Joseph M. Magaldi, JR., Deputy Director
Department of Transportation Services
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

After reviewing the AA/Draft EIS for the Honolulu Rapid Transit Development Project, I believe the best alignment would be the Salt Lake/ Beretania alternative. It appears to serve the most people both in Salt Lake and the Central Business District (CBD) without the outrageous expense of tunneling (or cut and cover) down the newly completed Hotel Street. The visual impacts could be mitigated by reducing the cross-section of the beam support and columns (similar to the Disney World system).

The second best alignment would be the Salt Lake/Nimitz but only if an additional loop system through the CBD is built.

Both alternatives are overhead which will reduce the cost and construction time. By reducing the cross-section and with proper alignment, traffic lanes would not be taken on Beretania and/or Alakea. The use of a bridge or cantilever system would also reduce the ground impact of column supports.

I also believe a loop system would better serve Waikiki as opposed to the dead end spur. A loop on Kalakaua, Kapahulu, Kuhio, Kalakaua, Kapiojani, Atkinson, and Ala Moana would serve all of Waikiki. It could be connected to the main line at Kalakaua/Kapiojani and have a separate stop at the Ala Moana shopping center. This system could be a bi-directional loop with smaller vehicles operating at shorter intervals similar to a people mover system.

Finally, I request that once this initial project is begun (Pearl City to the University), planning be commenced on extensions to Hawaii Kai, Mililani, and Ewa. If you have any questions regarding the above comments or alternatives, please contact me.

Sincerely,

David J. Welhouse
Hawaii Kai Neighborhood Board No. 1
1362 Lunalilo Home Road
Honolulu, Hawaii 96825

cc: John Henry Felix
    Benjamin B. Lee
    Amar Sappal
Mr. Joseph H. Nagalda, Jr.
Deputy Director
Department of Transportation Services
Honolulu Rapid Transit Development Project
NCR Building, 3rd Floor
720 Kapiolani Boulevard
Honolulu, HI 96813

922 Mokulua Drive
Kailua, HI 96734
7 May 1990

WRITTEN TESTIMONY ON

ALTERNATIVES ANALYSIS/DRAFT ENVIRONMENTAL IMPACT STATEMENT:

BY: E. ALVEY WRIGHT, HTech
    Rear Admiral, USN(Ret)
    Former State Director of Transportation

    Congratulations on the progress of the Honolulu Rapid Transit
    Development Project, and thank you for the opportunity to comment
    on the AA/DEIS.

    I recommend the Fixed Guideway technology, electrified,
    automated, and fully grade separated along the full length
    identified as Alternative 3 from Waiawa via Kamehameha Highway,
    Airport, Dillingham, Hotel Street, to the University and Waikiki.

    The subway segment is particularly important to avoid visual
    impact through the central business and historic districts and, at
    the same time, provide optimum convenience to the commuter.

    For this route, the magnetic levitation technology appears to
    be particularly suitable because of the exceptionally low noise
    and because the tunnel cross-sectional area required by
    AEG Westinghouse Transportation Systems, Inc., is 20 to 30% less
    than for other technologies.

E. Alvey Wright
May 22, 1990

Mr. Joseph M. Magaldi, Jr., Deputy Director
Dept. of Transportation Services
650 S. King St., 3rd Floor
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

I strongly support the City and County of Honolulu's plan to provide a rapid transit system for the residents of Oahu.

The City's proposed rapid transit system is obviously needed in order to handle the expected increase of vehicles using our highways. Everyone are aware that our present highways are already too congested during peak traffic hours.

I would like to express my appreciation for the hard work you and your staff have done to date towards providing the best possible solution for our traffic situation.

Sincerely yours,

Ronald Yamamoto
2672 Nonoko St.
Wahiawa, HI 96786
Sioux Yohe  
14 Aulike St. #402  
Kailua HI 96734

May 10, 1990

Joe Magaldi  
Deputy Director  
Department of Transportation Services  
650 S. King Street, 3rd Floor  
Honolulu, Hawaii 96813

Re: Proposed Fixed Rail Transit System

Dear Mr. Magaldi:

The prospect of having this elevated and underground fixed rail transit come to pass has infuriated me. Someone with good sense has got to listen and nix this thing. I have been on the mailing list of citizens to receive information on the proposal from the outset, and nothing, not one iota, that I have seen in these informational mailings has even come close to convincing me that this system will benefit the citizens of this island - the citizens who will have to pay for it!

This system, or any fixed rail system, is ugly. We live in a beautiful place and this would only detract from the scenery and serenity. I happened to see on the (Channel 2?) news last night an artist's perception of what the system would look like through Waikiki and I was appalled! Having been a resident of the Bay Area, I can tell you that being a lone woman waiting for a (BART) train can be a pretty frightening experience and I certainly think that such a system here would contribute to the crime, degradation and neighborhood devastation just as it has in the Bay Area.

In order for this system to be most effective, parking lots would be needed. Sorry, but I don't see the wisdom in creating more parking lots on this island, especially for a transit system. Riders will not leave their cars in hot parking lot all day, just to jump on a fixed rail transit to take them a few miles into town or Waikiki. This sort of logic only works when you have a ridership living in Walnut Creek or Fremont who work in San Francisco.
Joe Magaldi
May 10, 1990
Page 2

I am stumped as to why Waihee and Fasi are pushing this ludicrous idea so hard—unless the reason is that they stand to realize some financial gain from this. To tear up streets and disrupt traffic flow for years makes no sense whatsoever.

I earnestly believe that if Waihee and Fasi, as well as all other public officials and elected persons, truly want to fix the public transportation system on Oahu, they should start by getting first-hand experience of riding the busses to and from their employment. Experience, please, the extremely overcrowded busses morning and night; the long, long wait for a bus (while the tourists enjoy hopping around Waikiki on busses that show up literally every two minutes!); and having to pay $25 for a taxi to get over the Pali because you’ve missed your last bus for the night at 9:30.

What we truly need are more busses and better bus service—not this pie-in-the-sky transit system. I feel as though these public officials are cramming this down my throat, adding insult to injury by requiring that I pay for it. The response to bus ridership on this island shows me first-hand that the bus system works—people do use the busses here. But if you want to get people out of their cars and into the busses, you’ve got to provide better service: more busses so that we don’t have to stand to and from work nearly every day and a more frequent schedule to cut down on the waiting time. Except for the construction workers who would build a fixed rail transit, this system will not provide any jobs for people here, whereas a better bus system would provide continued employment for many.

Forget this stupid idea of fixed rail transit. The only sane alternative is to provide a better bus system—and a ferry from Hawaii Kai to downtown seems like a decent idea for the folks living in that area. A ferry for the Ewa area people that work downtown also seems a good idea. One parking lot would suffice for the Ewa and Hawaii Kai riders, rather than the many that you’re contemplating with a fixed rail transit.

Don’t put yet another blight on this island, PLEASE!

Sincerely,

[Signature]

cc: City Council
Mr. Amar Sappal  
Project Manager  
Rapid Transit Development Division  
Department of Transportation  
650 South King Street  
Honolulu, HI 96813  

Dear Mr. Sappal,

As a resident of Foster Heights Villas, I am against having the Rapid Transit route down Salt Lake Boulevard. I am in favor of the Kamehameha Highway route.

[Signature] Judd M. Young  
Resident Name  

[Signature] Judd M. Young  
Resident Name/Owner  

428 Salt Lake Blvd F-33  
Resident Address  
Honolulu, HI 96818  

Date 5-21-90
Mr. Aman Sappal
Project Manager
Rapid Transit Development
DEPT. OF TRANSPORTATION
650 S. KING ST.
Honolulu, HI 96813
Mr. Amar Sappal, Project Manager
Department of Transportation Services
650 South King Street, Third Floor
Honolulu, HI 96813

Dear Mr. Sappal:

I am writing in regards to the proposed elevated mass transit system and submitting my thoughts on the route choices of Kam Highway or Salt Lake Boulevard in the Aloha Stadium area.

I envision no advantage of utilizing Salt Lake Boulevard for the following reasons:

- Since this is a highly built up mostly residential area there would be little available land for any additional parking for commuters or expansion of Salt Lake Boulevard.

- The traffic on Salt Lake Boulevard has doubled in just the past year and can't support any more traffic.

- Since Makalapa Elementary, Radford High, and Aliamanu Intermediate schools are next to Salt Lake Boulevard, the noise and distraction from the proposed transit system would not be conducive to the learning process of our young people.

Kam Highway would be the logical choice for an elevated mass transit system for the following reasons.

- If people are to be enticed into using mass transit instead of privately owned vehicles then the system must be located in an area that is convenient to various shopping centers so that they won't have to go out of their way to obtain needed services. Kam Highway fills that need.

- The length of Kam Highway is mainly bordered by commercial enterprises that could benefit from any mass transit stops located in that area. The noise from the elevated transit system would not appreciably add to the current noise level on Kam Highway.

- Kam Highway is more convenient for military personnel at Pearl Harbor and Hickam and also for people going to and from the airport complex.

Sincerely,

Ronald A. Young
SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT


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- Department of Agriculture, Soil Conservation Service
- Department of the Air Force (PACAF)
- Department of the Army
- Department of the Navy, Chief of Naval Operations
- Department of the Navy, Civil Engineering
- Environmental Protection Agency

2.0 HAWAII STATE AGENCIES
- Department of Budget and Finance
- Department of Business, Economic Development & Tourism
- Department of Defense, Adjutant General
- Department of Defense, Civil Defense
- Department of Education
- Department of Health (2)
- Department of Human Services
- Department of Land and Natural Resources (2)
- Hawaii Community Development Authority (Kakaako)
- Office of Environmental Quality Control
- Office of State Planning
- University of Hawaii at Manoa, Environmental Center
- Waikiki Convention Center Authority

3.0 CITY AND COUNTY OF HONOLULU
- Board of Water Supply
- Building Department
- City Council, Arnold Morgado (5)
- Department of General Planning
- Department of Parks and Recreation
- Fire Department
- Manoa Neighborhood Board No. 7
- McCully/Moiliili Neighborhood Board No. 8
- Police Department
- Waikiki Neighborhood Board No. 9
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4.0 COMMUNITY, CIVIL AND BUSINESS ASSOCIATIONS

Committee on Sensible Transit
Honolulu Taxpayers for Traffic Solutions
League of Women Voters of Honolulu (3)
Leeward Oahu Transportation Management Association
Outdoor Circle
Waikiki Residents Association

5.0 BUSINESSES

Ala Moana Center
Tim Chow, Planning Consultant
Stryker Weiner Associates, Inc.

6.0 PRIVATE CITIZENS

Byers, Cindie
Nye, Nicolette
Yokota, Neal
1.0 UNITED STATES GOVERNMENTAL AGENCIES
March 26, 1992

Mr. Louis F. Marz, Jr.
Western Area Director
Federal Transit Administration
211 Main Street, Room 1160
San Francisco, CA 94105

RE: Supplemental Draft Environmental Impact Statement

Dear Mr. Marz:

On March 19, 1992, we received your Supplemental Draft Environmental Impact Statement concerning the Honolulu Rapid Transit Program. Thank you for allowing us to review and comment on this document.

The draft analyzes various alternatives which are being considered for the Rapid Transit System and it appears that most of the proposals have the potential to affect historic properties. We have noted that the Aloha Tower, the Dillingham Transportation Building and Mother Waldren Park are the properties that stand to be most directly affected. We look forward to working with you to create a Memorandum of Agreement which will minimize the impact on these and all other properties in the area of potential effect.

If you have any questions or concerns, please contact Andrew Lewis of our staff at (303) 231-5320 or FTS 554-5320.

Sincerely,

Claudia Miers
Director, Western Office of Project Review
April 7, 1992

The Honorable John D. Waihee
Governor, State of Hawaii
220 South King Street, Fourth Floor
Honolulu, Hawaii 96813

Dear Governor Waihee:

Subject: Supplemental Draft Environmental Impact Statement (SDEIS) Honolulu Rapid Transit Program, Oahu

Thank you for allowing us the opportunity to review the Supplemental Draft Environmental Impact Statement for the Honolulu Rapid Transit Program. We have no comments to offer at this time.

We would appreciate the opportunity to review the Final EIS.

Sincerely,

WARREN M. LEE
State Conservation

cc:
Mr. Frank J. Doyle, Office of Rapid Transit, City and County of Honolulu, 711 Kapiolani Boulevard, Suite 300, Honolulu, HI 96813
Mr. Benjamin B. Lee, Director, Department of General Planning, City and County of Honolulu, 650 S. King Street, 8th Floor, Honolulu, HI 96813
Director, Office of Environmental Quality Control, 220 South King Street, Fourth Floor, Honolulu, Hawaii 96813
Comments on the Supplemental Draft Environmental Impact Statement for the Honolulu Rapid Transit Program

1. The Amended Locally Preferred Alternative (Amended LPA) of the fixed guideway system will affect an Air Force easement along Kamehameha Highway between Lehua Avenue and Radford Drive. The easement is for a portion of the buried POL pipeline that runs from Waikakalua POL Storage Annex to Hickam Air Force Base.

2. If you have any questions, please contact Mr. Jack Yamauchi, 449-7519.

DONALD J. MEISTER, Lt Col, USAF
Director of Civil Engineering

DISTRIBUTION
Office of Environmental Quality Control
220 South King Street, 4th Floor
Honolulu HI 96813

Office of Rapid Transit
City and County of Honolulu
711 Kapiolani Blvd, Suite 300
Honolulu HI 96813

Department of General Planning
City and County of Honolulu
650 South King Street, 8th Floor
Honolulu HI 96813
May 6, 1992

Mr. Brian J. J. Choy, Director
Office of Environmental Quality Control
220 South King Street, Fourth Floor
Honolulu, Hawaii 96813

Dear Mr. Choy:

We have reviewed the Supplemental Draft Environmental Impact Statement (SDEIS) for the proposed Honolulu Rapid Transit Program, Honolulu, Hawaii. The following additional comments are provided pursuant to Corps of Engineers authorities to disseminate flood hazard information under the Flood Control Act of 1960 and to issue Department of the Army (DA) permits under the Clean Water Act; the Rivers and Harbors Act of 1899; and the Marine Protection, Research and Sanctuaries Act.

a. The project will require a DA permit for crossings of twelve streams along the proposed transit route. Detailed comments from Operations Division are enclosed.

b. The flood hazard information presented on pages 3-45 (paragraph 3.2.3) and 5-52 is correct.

Sincerely,

/s/

Ray H. Jyo, P.E.
Acting Director of Engineering

Enclosure

Copies Furnished:

City and County of Honolulu
Office of Rapid Transit
Attention: Mr. Frank J. Doyle
711 Kapiolani Boulevard, Suite 300
Honolulu, Hawaii 96813

City and County of Honolulu
Department of General Planning
Attention: Mr. Benjamin B. Lee
650 South King Street, Eighth Floor
Honolulu, Hawaii 96813
General Comments:

1. The applicant has consulted periodically with Ops Div and met with us on March 1992 to review the status of the proposed action. The project will require a DA permit for crossing of twelve streams along the transit route. Some crossings will involve construction of piers in the streams, others will be spanned. The route is substantially within existing roadway alignments, generally in medial strips or elevated.

2. A botanical survey of undeveloped areas within the proposed alignments identified only one undeveloped area between Waiawa and Keehi Lagoon. This survey was coordinated with the Corps and, by letter dated July 19, 1989, confirmed that no wetlands under Corps jurisdiction are found within the area to be impacted by the alignments.

3. As the project alignment and design are finalized, the applicant will continue to coordinate with Ops Div to update jurisdictional determinations. A DA permit application is expected in about one year. Discussions are ongoing among the Corps, Coast Guard and Fed Transit Admin. of US DOT regarding possible designation of the Corps and Coast Guard as Cooperating Agencies in the FEIS, in accordance with CEQ procedures.

Specific Comments:

1. Page S-35, Required Permits and Approvals

   The reference to the Corps permit should read: "U.S. Army Corps of Engineers Permit for activities in waters of the United States."

2. Page 3-45, para 3.8.4 Wetlands

   For jurisdictional purposes, the Corps of Engineers does not use the U.S. Fish and Wildlife National Wetland Inventory (NWI) maps. Discussion of the NWI may be included for descriptive purposes, but the section should make reference to the botanical surveys performed in undeveloped
areas along the route and cite the coordination with the Corps of Engineers regarding the identification of wetlands subject to Corps regulatory jurisdiction.

3. Page 5-53, para 5.8.4 Wetlands

Again, for jurisdictional purposes, streams are not designated wetlands, but are considered waters of the United States, and a Corps permit would be required for work in these waters as described earlier. This paragraph also concludes that the alignment and station near the University of Hawaii, as well as the Halekauwila option, were reexamined for presence of wetlands. None of the field surveys for these sites have been coordinated with the Operations Division for jurisdictional determinations. We recommend that the findings be confirmed with Operations Division, and the results be reflected in the final SDEIS.

4. Page 5-53, para 5.8.5 Dredge and Fill

Discharges of dredged or fill material incidental to the construction of bridges across navigable waters, including cofferdams, abutments, foundation seals, piers, and temporary construction and access fills may be considered permitted under the Corps nationwide permit program, provided such discharges have been authorized by the U.S. Coast Guard as part of their bridge permit, and provided that the applicant obtains a Section 401 Water Quality Certification from the State Department of Health. To the extent that plans are available at the time of finalization of the SEIS, the actual construction work in each stream should be described, its impacts identified, and the mitigative measures to be taken to minimize impacts on the waters of the United States should be described.
Mr. Donald Emerson  
Office of Planning  
Federal Transit Administration  
400 7th Street, NW  
Washington, DC 20590

Dear Mr. Emerson:

The Supplemental Draft Environmental Impact Statement for the proposed Honolulu Rapid Transit Program has been reviewed. We concur with the findings in the document and plans for its public distribution.

[Signature]

C. J. O'Connell  
Captain, CEC, DSN  
Assistant for Planning and Real Estate  
Shore Activities Division

Copy to:  
CINCPACFLT  
COMNAVFACENGCOM (Code 20Y)  
COMNAVBASE Pearl Harbor  
PACNAVFACENGCOM (Code 09P)  
CHINFO
Mr. Brian J. J. Choy  
Office of Environmental Quality Control  
220 South King Street, Fourth Floor  
Honolulu, HI 96813

Dear Mr. Choy:

SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT (SDEIS), HONOLULU RAPID TRANSIT PROGRAM, HONOLULU, HAWAII, MARCH 1992

Thank you for the opportunity to review the SDEIS for the Honolulu Rapid Transit Program dated March 1992. Our comments, enclosure (1), are submitted for your consideration in preparing the final SDEIS.

Should you have any questions on this matter, the Navy's point of contact is Mr. Bill Liu, Assistant Base Civil Engineer, telephone 471-3324.

Sincerely,

W.K. Liu  
Assistant Base Civil Engineer  
By direction of the Commander

Encl:  
(1) Review Comments

Copy to:
Mr. Frank Doyle  
Manager and Chief Engineer  
Office of Rapid Transit  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, Third Floor  
Honolulu, HI 96813

Mr. Benjamin B. Lee  
Department of General Planning  
City and County of Honolulu  
650 South King Street, Eighth Floor  
Honolulu, HI 96813
REVIEW COMMENTS

1. Table of Contents, section under Chapter 5.10 Historic and Archaeological Resources, Page (ix). It appears that section was mispaged; should be revised to read 5-70 vice 5-62.

2. Executive Summary, Paragraph S.3.2.3., Page 5-28. Revise the acreages and square feet indicated in subparagraphs "Historic Resources" and "Section 4(f) Involvement", respectively, for easement requirements to conform with the information in Chapter 5, Paragraph 5.12.1.3, Page 5-80. The easement requirements in this paragraph, which indicates about 0.23 acres (10,000 square feet) for the Arizona Memorial Station and about 0.17 acre (7,500 square feet) for the Makalapa Gate Station, more closely approximates the land required to support the two stations.

3. Chapter 3, Figures 3.3b (Page 3-5), 3.8b (Page 3-41), and 3.10b (Page 3-49), and Chapter 5, Figure 5.29 (Page 5-50). Remove the words "Naval Reservation" for the land located makai of the H-1 Interstate and between Rodgers Boulevard and Elliot Street as the State of Hawaii owns this land.


5. Chapter 3, Paragraph 3.8.2 Groundwater, Page 3-45. Request revise last sentence to read as follows: "The Navy is currently in the process of conducting an investigation...........

6. Chapter 5, Figure 5.6, Page 5-10. Is there a specific reason why the Makalapa Gate Station area impact circle is "off-centered" while the other stations impact circles appear to be "centered?"

7. Chapter 5, Paragraph 5.2.1, first paragraph on page 5-21. Narrative is unclear as to whether the SIP is on City property and not part of the Ewa Drum Storage site. Revise narrative.

8. Chapter 5, Paragraph 5.2.1, fourth paragraph on page 5-21. The first sentence reads "Discussions with the Navy........other planned uses....." Delete the word "planned."

9. Chapter 5, Paragraph 5.2.1 (Section 11), Page 5-21. Revise the acreages indicated from 0.12 and 0.04 to 0.23 and 0.17 for the Arizona Memorial Station and Makalapa Gate Station, respectively, for conformance with the information in paragraphs 5.12.1.3.

10. Chapter 5, Paragraph 5.12.1.3, Page 5-80. Narrative refers to Figure 5-40 for Makalapa Gate Station. Correct reference to figure to read Figure 5-31.

Enclosure (1)
11. Chapter 5, Table 5-8, Page 5-57. Revise the acreage indicated in ROW/Easeement Required for the Pearl Harbor Naval Base from 0.39 acre to 0.40 acre for conformance with paragraph 5.12.1.3.

12. Chapter 5, Figure 5.31, Page 5-60. The figure shows an elevated mezzanine at the Makalapa Gate Station leading to a grade access structure inside of the existing Naval Station security fence. Appropriate design drawings for the Makalapa Gate and Arizona Memorial Stations must be reviewed and approved by the Navy to assure compliance with physical security requirements.

13. Chapter 5, Figures 5-42 and 5-43, Pages 5-73 and 5-74, respectively. It appears that the picture descriptions have been inadvertently switched.

14. Chapter 5, 5.13.4.1 Water Quality, Page 5-91. Revise second to last paragraph to read as follows:

"In the 1970s, a gasoline spill resulting from vandalism occurred on the Navy Ewa Drum Storage Site proposed for the location of the Kalawa Station, park-and-ride lot, and the fixed guideway maintenance facility. To confine the spill and determine the extent of contamination of property, exploratory studies were conducted and a report documenting the findings was prepared. Investigations recommended recovery of the "free gasoline product" in the groundwater by constructing an interceptor trench and recovery wells. The wells were pumped until the "free gasoline product" was no longer recoverable. The Navy is currently in the process of conducting an investigation in accordance with CERCLA protocol to determine the present extent of the contamination including dissolved fractions of gasoline. A risk assessment will be conducted to determine the risks posed to present and future activities at the site.

15. General comment. Based on artist renderings and station layout sketches, will the Makalapa Gate and Arizona Memorial Stations be landscaped? If they are, the SDEIS must address the landscape irrigation water requirements, the anticipated source of irrigation water, and the effect of these demands on the local area water system.

16. General Comment. Understand that each station will generally have restrooms/maintenance rooms for only the Mass Transit maintenance personnel. If so, what is the anticipated source of water and sewer for the Makalapa Gate and Arizona Memorial Stations? What might be the quantities of both water and sewer?

17. General Comment. The Air Force has a fuel valve station and associated piping in the former Ewa Drum Storage site.

18. General Comment. Chevron and Hawaii Independent Refinery Incorporated have fuel pipelines near the proposed Arizona Memorial Station.
Dear Mr. Hom:

The Environmental Protection Agency (EPA) has reviewed the Supplemental Draft Environmental Impact Statement (SDEIS) for the proposed Honolulu Rapid Transit Program, City and County Honolulu, Hawaii. Our review is provided 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.

On May 23, 1990 our office provided comments on the Draft Environmental Impact Statement (DEIS) prepared for the Honolulu Rapid Transit Program. Our review indicated that the DEIS was well presented as reflected in the assigned L0-1 rating. We also encouraged the development of a fixed guideway alternative in view of potential air quality benefits to the region.

The SDEIS provides information on a slightly modified Locally Preferred Alternative (LPA). The proposed modifications are as follows:

- The Waikiki segment of the transit line has been eliminated, due to "budgetary and environmental reasons." The proposed fixed guideway has thus been shortened by 1.3 miles. Under the modified proposal, that section of the transit system would be serviced by shuttle bus.

- It was determined that construction of a subway section along Hotel Street would not be cost effective. This segment was realigned to the Nimitz Highway.

- The University/Metcalf terminus was eliminated in favor of the University/Quarry terminus because the latter would allow for a future extension to East Honolulu.
- One 450 space park-and-ride lot was added at the Lagoon Station.

- Three alternative sites for a University area park-and-ride lot have been added for consideration.

- The Halekauwila option, an alternative location for the aerial structure originally located on Pohukaina Street, has been added for consideration. This option would relocate the proposed aerial structure one block to Halekauwila Street.

Once again, we believe that the document provides a good description of the proposed project and analysis of most of the potential related impacts. Although we feel that the proposal to service Waikiki with shuttle bus service in lieu of a fixed guideway would not be as efficient as the original proposal and would not provide as many air quality benefits to the region, we reiterate our prior rating of LO-1, albeit marginally. It would be advantageous for the FEIS to provide more information on the specific "environmental reasons" (referring to page P-3 of the SDEIS) that this section of the project was modified.

Our detailed comments, attached, also recommend that additional clarifications be provided in terms of protecting the sole-source aquifer; managing nonpoint source pollution; adherence to stormwater permitting requirements; proposed monitoring of sediment discharge; discussing specific details concerning use of the Navy's Drum Storage Site; further discussing remediation plans for the underground tanks associated with the Halekauwila option; adherence to requirements of the Clean Air Act; and the rationale for the newly proposed park-and-ride facilities. We also encourage the use of pollution prevention and energy conservation in developing the project beyond the draft stage.

We appreciate the opportunity to review this SDEIS. Please send three copies of the Final Environmental Impact Statement (FEIS) to this office at the same time it is filed with our headquarters in Washington, D.C. Meanwhile, should you have questions or wish to discuss the project, please contact Dr. Jacqueline Wyland at 415-744-1584 or have your staff contact David Farrel at 415-744-1574.

Sincerely,

[Signature]

Deanna Wiman, Director
Office of External Affairs
WATER QUALITY

In reference to §1424(e) of the Safe Drinking Water Act, we recommend that the FEIS identify preliminary mitigation measures being considered to prevent contamination of the sole-source aquifer. These measures could then be refined and carried forward to the actual §1424(e) review and approval process once the detailed design stage is completed.

We would like to reiterate our earlier recommendation (DEIS comments, dated May 23, 1990) that the Federal Transit Administration "consult with the Hawaii Department of Health (HDOH) in the design of a (sediment discharge) monitoring system and that the data collected should be entered into the STORET database, to facilitate sharing data with other water quality management agencies."

In May 1991, EPA published the Proposed Guidance Specifying Management Measures for Sources of Nonpoint Pollution in Coastal Waters pursuant to §6217(g) of the Coastal Zone Reauthorization Amendments of 1990. Management measures are defined in §6217(g)(5) as, "economically achievable measures for the control of the addition of pollutants from existing and new categories and classes of nonpoint sources of pollution, which reflect the greatest degree of pollutant reduction achievable through the application of best available nonpoint pollution control practices, technologies, processes, siting criteria, operating methods, or other alternatives." In preparing the FEIS, and inasmuch as the Fixed Guideway Alternative is within the coastal zone, implementation of this guidance should be considered and acknowledged.

The FEIS should also indicate whether the project sponsor has contacted HDOH to obtain a stormwater permit for construction periods. Pursuant to §402(p) of the CWA, any project encompassing a land area greater than five acres requires a stormwater permit.

For your information, EPA expects to publish a final guidance for nonpoint pollution in May, 1992. You may wish to contact Jovita Pajarillo of the Water Quality Branch of our Water Division at (415) 744-2011 to obtain a copy of the proposed guidance.
HAZARDOUS MATERIALS/WASTE

The SDEIS suggests that the U.S. Navy EWA Drum Storage Site (proposed as the location for a maintenance/storage facility and station/park and ride lot for this project) "was subjected to a localized gasoline spill in March 1971," and that in addition to "completing" a recovery program, the Navy is "conducting a supplemental investigation to determine the presence/extent of remaining contamination." (Our records indicate that this location is identified as IAS site 27, and is considered as part of the overall Naval Supply Center, Pearl Harbor NPL site.) The FEIS should include details of any preliminary findings from the Navy's study, indicate when the final results will be available, and discuss the options available to the Rapid Transit Program (RTP) proponents should additional and/or extensive contamination be discovered. Should additional remediation be necessary, the FEIS should provide details on how the Navy and the project proponents would ensure that existing contamination is not mobilized or exacerbated by the activities of the proposed use. Refer also to our comment on sole source aquifer protection.

On page 2-28, the SDEIS indicates a modification in the design of the Waiawa Station in that the facility is now being proposed as a "retained cut" station rather than "at-grade." The FEIS should explain the meaning of "retained cut," describe the amount of cut necessary, and indicate what (if any) effect this might have on any subsurface contaminants at that site.

Figure 2.14 depicts a "hazardous materials room" at the Maintenance and Storage Facility. The FEIS should identify the materials (and wastes, if applicable) that might be stored at the facility, provide information on the construction of the facility (in accord with the Resource Conservation and Recovery Act [RCRA]), and generally discuss the purpose and need for the "room." We would also like to take this opportunity to again remind the project proponents that RCRA requires hazardous waste generators to certify that they have taken steps to reduce the volume of hazardous waste generated. Please refer to our comments on the DEIS for additional information.

On page 5-93, the SDEIS indicates that "several underground storage tanks may (highlight added) be located along the alignment for the Halekauwila Option." We assume that the tanks referred to are no longer being used. The FEIS should provide additional specific information concerning the location, contents, and status of any tanks and associated piping. In addition, the FEIS should acknowledge that remediation may be necessary if any of the tanks have released harmful materials into the environment. Inasmuch as removal, abandonment, and, if necessary, remediation can be quite costly which could influence
selection of the Halekauwila Option, we recommend the project
proponent undertake an expedited investigation to determine the
status of the reference tanks. This information should be
included in the FEIS.

AIR QUALITY

The FEIS should acknowledge that major amendments to the
Federal Clean Air Act (CAA) were enacted into law in 1990, and
should clearly demonstrate that the proposed project would fully
adhere to the provisions of the Act.

Reference is made, on page 5-33, to shuttle-buses stopping
(idling) at the Ala Moana Center and Kalakaua/Kapiolani Stations.
The discussion indicates that since such stops would not be for
"long periods," carbon monoxide (CO) hotspots would not be
problematic. The FEIS should be more specific in defining "long
periods," should discuss the potential for bus queuing which
could exacerbate CO emissions, and should provide data on estimated CO emissions. In addition, refer to Sections 202(f)
and 219 of the amended CAA for new Urban Bus Standards which
can be applicable to the shuttle-bus services being proposed in the
SDEIS. Applicable requirements should be discussed in the FEIS
and considered in terms of overall project decisionmaking.

On page 5-89, the SDEIS suggests that impacts from fugitive
dust "can" (highlight added) be mitigated through dust control
measures, but does not actually commit to implementing the
measures. Similarly, on page 5-47, the document suggests that
"runoff pollutants could (highlight added) be minimized through
installation of mitigation measures..." The FEIS should indicate
what would be done to mitigate in each instance.

PARK AND RIDE

The Amended Locally Preferred Alternative (ALPA) provides
for a 450 vehicle park and ride facility at the Lagoon Station,
whereas there were no plans for a park and ride facility at this
station in the DEIS. The FEIS should discuss the rationale for
adding the park and ride facility to the project and should also
provide the rationale for the size of the facility.

The SDEIS briefly discusses plans for three optional park
and ride facilities in the University area, noting that two of
the optional sites would displace 20 businesses (each) and the
other would displace one business. From the information
presented, it is unclear which of the options would only displace
one business. Along with this information, the FEIS should
discuss the anticipated need for parking spaces; for example, is a 100 space facility adequate to meet anticipated needs? And if so, why are the other options so much larger? In addition, the FEIS should indicate the preferred option and discuss the basis for the preference. Unless there are circumstances not mentioned in the SDEIS, we would like to discourage siting a park and ride facility, such as the Oasis Nightclub and Lounge option, so distant from a station that shuttle buses are required to deliver rapid transit passengers from their vehicles to the station and visa-versa.

POLLUTION PREVENTION & CONSERVATION

EPA feels there are several excellent opportunities to incorporate pollution prevention and conservation into the scope of the project. We recommend that the FEIS present and commit to as many pollution prevention and conservation mechanisms as possible. These opportunities could take the forms of installing low-flow toilets in proposed support structures, establishing a material recycling program at the maintenance facility, and using lighting systems which are energy efficient (refer to EPA's Green Lights Program), among others.
Enclosure
000375SD.DF

cc: Mr. Frank Doyle
Manager and Chief Engineer
Office of Rapid Transit
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Governor, State of Hawaii
c/o Office of Environmental Quality Control
220 South King Street, 4th Floor
Honolulu, Hawaii 96813

Mr. Benjamin Lee
Department of General Planning
City and County of Honolulu
650 South King Street, 8th Floor
Honolulu, Hawaii 96813
2.0 HAWAII STATE AGENCIES
The Honorable John Waihee, Governor  
State of Hawaii  
c/o Office of Environmental Quality Control  
220 South King Street, Fourth Floor  
Honolulu, Hawaii 96813

Dear Governor Waihee:

Subject:  Honolulu Rapid Transit Program  
Supplemental Draft Environmental Impact Statement

We have reviewed the subject report and offer the following comments.

The park and ride facilities to be provided in alternatives 1 and 2 should be verified with the affected landowners. These facilities are an integral component and should be confirmed as viable options/locations.

We note that up to 52 businesses may be displaced by the proposed project. Pursuant to Chapter 111, HRS, the HFDC has oversight responsibility for ensuring that proper relocation assistance is provided to displaced persons and businesses. We request a copy of the relocation assistance plan for our review.

Thank you for the opportunity to comment.

Sincerely,

JOSEPH K. CONANT  
Executive Director

c:  Mr. Frank J. Doyle, Office of Rapid Transit  
Mr. Benjamin B. Lee, Department of General Planning
Mr. Brian Choy, Director
Office of Environmental
Quality Control
Central Pacific Plaza
220 South King Street, 4th Floor
Honolulu, Hawaii 96813

Dear Mr. Choy:

Subject: Supplemental Draft Environmental Impact Statement (SDEIS) for the Honolulu Rapid Transit Program, Honolulu, Hawaii

We have reviewed the SDEIS for the subject Honolulu Rapid Transit Program including the errata sheet corrections received on April 13, 1992, and find that the proposed project will be predominately located within the State Land Use Urban District. However, we have the following comments.

1) The proposed Kalawa maintenance facility and storage yard, as approximately shown in Figure 2.10 on page 2-25, is in the vicinity of the State Land Use Agricultural District. We suggest that our office be contacted during the detailed planning for this facility in order to clarify the location of the district boundaries.

2) The proposed alignment of the transit system over Hoanalua Stream, as approximately shown on Plan and Profile STA 564+00 to STA 575+00 of Appendix B, is located within the State Land Use Conservation District. Consequently, we suggest that the Department of Land and Natural Resources (DLNR) be contacted on the development of this portion of the alignment.

3) We note that Section 5.1.2.3 Consistency With Land Use Plans does not include a discussion of the Rapid Transit Project's consistency with the State Land Use Law, Chapter 205, HRS, as amended. We suggest that the Final SDEIS include a discussion of the proposed Project's consistency with the State Land Use Law. We also suggest that the Final SDEIS include maps which reflect the proposed Project in relation to the State Land Use District Boundaries.
We have no other comments to offer at this time.

Thank you for the opportunity to comment on this matter.
If you have any questions, please call me or Steve Tagawa of my staff at 587-3822.

Sincerely,

[Signature]

ESTHER UEDA
Executive Officer

EU:fl
cc: Office of Rapid Transit
DGP
To: Office of Environmental Quality Control  
From: Lt. Col. Jerry M. Matsuda  
Contracting and Engineering Officer  
Subject: Honolulu Rapid Transit Program Supplemental Draft Environmental Impact Statement

Thank you for the opportunity to review and comment on the subject above.

The enclosed memorandum from the State of Hawaii, Department of Defense, Office of the Director of Civil Defense dated April 3, 1992, highlights our concern that Civil Defense sirens and siren simulator devices should be evaluated and incorporated into the environmental impact statement, planning, and design to ensure that an appropriate Civil Defense warning system is provided for the users of the Honolulu Rapid Transit System.

As the enclosed memorandum suggests, please contact Mel Nishihara, State Civil Defense planner, at 734-2161 to clarify any questions.

Enc.

c: SCD w/enc.  
   Oahu Civil Defense w/enc.

Benjamin Lee, Dept. of General Planning
TO: LTC Jerry H. Matsuda  
Contracting and Engineering Officer  

FROM: Roy C. Price, Sr.  
Vice Director of Civil Defense  

SUBJECT: HONOLULU RAPID TRANSIT SYSTEM - SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT SYSTEM  

April 3, 1992  

Thank you for the opportunity to review and comment on the subject report.  

We do not have negative comments specifically directed at the Supplemental Draft Environmental Impact Statement. However, we do have a proposal that entails the coordination of siren and siren simulator devices that could help alert and inform the public of an impending or actual event that threatens their well-being. A 115 db siren installed at the Waialua Station and Park-and-Ride and a siren simulator installed in a 24-hour manned office that can disseminate information to riders in the trains and the stations would complement the existing siren system. Just as parks, schools, fire hydrants, underground/overhead utilities and sidewalks are planned as integral infrastructures of any project, so must emergency warning systems be planned for the safety of the passengers and the residents of surrounding communities.  

The recommended location for the siren is annotated in red on the enclosed copy of page 2-29 of the Supplemental Draft Environmental Impact Statement. Additionally, the location of the simulator should be in a manned central control room for this system. Warnings and information can then be disseminated in a timely manner to the passengers on the trains, in the station and the parking lot areas.  

The purchase and installation of sirens, a siren simulator and the infrastructure for support of warning devices as the project is developed negate the need for excavation or modification of newly built structures and sidewalks for the later installation of these devices. A well planned installation of the siren simulator would include design of an antenna
cable duct from simulator location to the rooftop. The siren simulator should also be mounted near a control room operator and have a supply of emergency electrical power.

The concern for the safety of passengers in the transit system is paramount when there is a major disruption of service. A disaster plan outlining procedures for handling any disruption of service resulting from natural hazards (hurricanes/high winds, flooding, tsunamis and earthquakes) as well as technological hazards (power outages) should be coordinated with the primary response agencies (police, fire, emergency medical services and civil defense). The viability of this transit system to function effectively as a means to safely and expeditiously evacuate passengers and area residents, if it becomes necessary, should be closely evaluated.

Our State Civil Defense planners are available to discuss this further if there is a requirement. Please have your staff call Mr. Mel Nishihara of my staff at 734-2161.

Enc.
Governor, State of Hawaii
C/O Office of Environmental Quality Control
220 South King Street, Fourth Floor
Honolulu, Hawaii 96813

Dear Sir:

SUBJECT: Honolulu Rapid Transit Program
Supplemental Draft Environmental Impact Statement

Our review of the subject supplemental EIS indicates that the proposed rapid transit route may have an impact on two schools. Pearl City Elementary School and Kalihi-Kai Elementary School are both located less than 70 feet from the proposed transit system. The Department of Education is concerned about the noise generated by the steel-wheeled vehicles on the steel-rail passing close to both schools.

On page 5-36, the subject report states that "Kalihi-Kai Elementary, located on Dillingham Boulevard, is in the vicinity of the amended LPA. However, the school building is located 44 feet from the nearest track centerline so that no adverse noise impacts are expected." We disagree that no noise impact is expected. The report does not mention Pearl City Elementary School in the noise impact studies even though the fixed-rail system will run above Kamehameha Highway next to the school.

AN AFFIRMATIVE ACTION AND EQUAL OPPORTUNITY EMPLOYER
Governor, State of Hawaii  
Page 2  
April 23, 1992  

We request that noise abatement measures be required for both schools if decibel levels exceed the allowable Department of Health standard of 60 dBA.  

Should there be any questions, please call the Facilities Branch at 737-4743.  

Sincerely,  

Charles T. Teguchi  
Superintendent  

cc: A. Suga
TO: The Honorable John Waihee
Governor, State of Hawaii

c/o Director, Office of Environmental Quality Control
220 South King Street, 4th Floor
Honolulu, Hawaii 96813

FROM: John C. Lewin, M.D.
Director of Health

SUBJECT: Supplemental Draft Environmental Impact Statement (DEIS) for the Honolulu Rapid Transit Program

April 27, 1992

Thank you for allowing us to review and comment on the subject document.

On February 12, 1992, we commented on the City and County's Development Plan Public Facilities Maps Amendment for the Primary Urban Center and Central Oahu--Honolulu Transit Development Project. Please see the enclosed letter to Mr. Roland Libby, Jr.

We have no additional comments to make on the subject document at this time.

Enc.

C: Office of Rapid Transit
Department of General Planning
February 12, 1992

Mr. Roland D. Libby, Jr.
Deputy Chief Planning Officer
Department of General Planning
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Libby:

Subject: Comments to Development Plan Public Facilities Maps Amendment for the Primary Urban Center and Central Oahu—Honolulu Transit Development Project, 91-PUC-1020(IC)

Thank you for the opportunity to review and comment on the subject document. We have the following comments to offer:

1. Mitigative measures should be incorporated into the development design in order to minimize the potential impacts on the surrounding communities resulting from noise associated with the operation of the rapid transit vehicles.

2. Through facility design, sound levels emanating from stationary equipment, such as generators at Transit Stations, must be attenuated to meet the allowable levels of the Department of Health Administrative Rules, Chapter 11-43, Community Noise Control for Oahu.

3. Activities associated with the construction phase must comply with provisions of Department of Health, Administrative Rules, Chapter 11-43, Community Noise Control for Oahu.
   a. The contractor must obtain a noise permit if the noise levels from the construction activities are expected to exceed the allowable levels of the regulations.
   b. Construction equipment and on-site vehicles requiring an exhaust of gas or air must be equipped with mufflers.
c. The contractor must comply with the requirements specified in the rules and conditions issued with the permit.

3. Heavy vehicles travelling to and from the project site must comply with the provisions of the Department of Health Administrative Rules, Chapter 11-42, Vehicular Noise Control for Oahu.

If you should have any questions regarding this matter, please contact Mr. Jerry Haruno at 586-4700.

Very truly yours,

JOHN C. LEMIN, M.D.
Director of Health

C: Noise and Radiation Branch
Governor, State of Hawaii  
c/o Office of Environmental Quality Control  
220 South King Street, Fourth Floor  
Honolulu, Hawaii 96813

May 4, 1992

Dear Acceptor:

Subject: SEIS, Honolulu Rapid Transit Program, Ewa and Honolulu, Oahu

Thank you for the opportunity to review this document. We have no comments to offer at this time.

Sincerely,

Winona E. Rubin  
Director

cc: Office of Rapid Transit, City and County of Honolulu  
Department of General Planning, City and County of Honolulu
Governor, State of Hawaii
c/o Office of Environmental Quality Control
220 South King Street, Fourth Floor
Honolulu, Hawaii 96813

Dear Governor:

Subject: Supplemental Draft Environmental Impact Statement for the Honolulu Rapid Transit Program, Ewa and Honolulu

Thank you for giving our Department the opportunity to comment on this matter. We have reviewed the submitted draft SEIS for the Honolulu Rapid Transit Program and have the following comments.

Division of Aquatic Resources Comments:

Primary concerns related to sedimentation and runoff are addressed in the draft SEIS. From the information provided, it does not appear that there will be any direct modifications to stream habitats, but it should be noted that any bridge or other construction that will entail activity in stream bottoms or banks will require a Stream Channel Alteration Permit.

Office of Conservation and Environmental Affairs Comments:

The proposed rail alignment appears to be within the boundaries of the State Land Use Urban District. However, we are unable to confirm the exact location of the alignments relative to Conservation District land because a State Land Use Zoning Map was not included in the DSEIS. Any new, greater or different land use activity proposed in the Conservation District will require a Conservation District Use Application (CDUA).
Historic Preservation Division Comments:

Thank you for allowing us the opportunity to comment on the supplemental draft. The document accurately summarizes the archaeological situation along the project route. In general, the supplemental draft reflects the information submitted by our office. However, we would like to submit the following observations. The "Executive Summary" (p. 5-28) omits the determinations of adverse effect on the visual corridor to Aloha Tower and the adverse effect on Mother Waldron Park. These two determinations are included in other portions of the EIS.

We also believe the project will adversely impact the visual quality of the downtown area, a point which the document skirts. All measures should be taken to minimize this impact.

Thank you for your cooperation in this matter. Please feel free to call Sam Lemo at our Office of Conservation and Environmental Affairs, at 587-0377, should have any questions.

Very truly yours,

WILLIAM W. PATY

cc: Office of Rapid Transit
    Department of General Planning
MAY 18 1992

FILE NO.: 92-653

DOC. ID.: 704

The Honorable Joseph M. Magaldi Jr., Director
Department of Transportation Services
City and County of Honolulu
650 So. King Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

SUBJECT: Honolulu Rapid Transit Program – Supplemental Draft Environmental Impact Statement (SDEIS)

Thank you for giving our Department the opportunity to review this supplemental report. We have nothing else to add to our previous comments (Attached). However, we believe that comments should also be solicited from the appropriate Disabled American Veterans Chapter which may be affected by the alignment.

Thank you for your cooperation in this matter. Please feel free to call Sam Lemno at our Office of Conservation and Environmental Affairs, at 587-0377, should you have any questions.

Very truly yours,

[Signature]

WILLIAM W. PATT
Ref. No.: PL TRANS 7.7.2

May 6, 1992

The Honorable John Waihee,
Governor
State of Hawaii
c/o Office of Environmental
Quality Control
Fourth Floor
220 South King Street
Honolulu, Hawaii 96813

Dear Governor Waihee:

Re: Honolulu Rapid Transit Program
Supplemental Draft Environmental
Impact Statement (SDEIS)

The HCDA is generally supportive of the proposed rail system because it would enhance the transportation system serving the Kakaako District as future redevelopment occurs. We offer the following comments.

The Halskewilia Option

We have no objection to the possible relocation of the transit alignment from Pohukaina Street to Halskewilia Street. In terms of cost and impact on affected businesses, the latter route may be preferable. We would like to confirm our support for the side-of-the-street rail and transit station configurations proposed for the makai side of Halskewilia Street.

Consistency with HCDA Land Use Plan (Sec. 5.1.2.3)

The amended LPA would require various amendments of the Kakaako Mauka Area Plan. In particular, the transportation plan would need an amendment to reflect the rail alignment. Other amendments may be required to integrate the rail structures and stations with local and view corridor streets and to establish design criteria to minimize potential incompatibilities with adjacent development.

Station Area Impacts (Sec. 5.1.3)

Noise, vibration, views, privacy, and security are issues which may arise when stations are located near or
The Honorable John Waihee,
Governor
Page Two
May 6, 1992

adjacent to development projects. We recommend that planning and design of the rail project minimize potential adverse impacts on development projects along its route. Projects along this route with development permits from the HCDA include: 1) Waterpark Towers; 2) Servco Commercial; 3) Na Lei Hulu Kupuna Senior Housing; 4) Kauhale Kakaako Mixed-Use Family; and 5) The Majestic Plaza. Known but unpermitted potential developments along the route are located at the HECO power plant site, the Pohukaina School site and the HECO Kewalo Substation site. We will continue to work with the Office of Rail Transit in the mitigation of adverse impacts to existing and future developments in Kakaako.

Public parking will be developed near the Halekauwila/South and Halekauwila/Ahu Station. Across the street from the Halekauwila/Ahu Station, the Kauhale Kakaako project will have approximately 500 spaces. Approximately 400 public parking spaces will also be developed near the Halekauwila/South Station in the Waterpark Towers project.

Thank you for this opportunity to comment on the Honolulu Rapid Transit Program. We look forward to working with the Office of Rapid Transit in coordinating the construction of the rail system with our Improvement District Program and with future redevelopment in Kakaako. If you have any questions, please have your staff contact Eric Masutomi of the HCDA planning section at 587-2865.

Very truly yours,

Michael N. Scarfone
Executive Director

MNS/LC/MA/91st
cc: Mr. Frank J. Doyle (ORT)
    Mr. Benjamin B. Lee (DPP)
May 7, 1992

Mr. Frank Doyle
Office of Rapid Transit
City and County of Honolulu
711 Kapiolani Boulevard, Suite 300
Honolulu, Hawaii 96813

Dear Mr. Doyle:

Subject: Honolulu Rapid Transit Program
         Supplemental Draft Environmental Impact Statement

Thank you for the opportunity to review the subject document. We have the following comment:

1. Pursuant to §11-200-17(n), Hawaii Administrative Rules, please include a summary of unresolved issues and 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.

If you have any questions, please call Jeyan Thirugnanam at 586-4185.

Sincerely,

Brian J. J. Choy
Director

BC:jt
c: Department of General Planning
   City and County of Honolulu
MEMORANDUM

TO:     Mr. Brian J.J. Choy, Director
         Office of Environmental Quality Control
         Department of Health

SUBJECT: Supplemental Draft Environmental Impact Statement--Honolulu Rapid
         Transit System

May 6, 1992

The Governor referred the above report to the Office of State
Planning and the Department of Transportation for response. We reviewed the
City's Supplemental Draft Environmental Impact Statement (SDEIS) and support
the concept of the Rapid Transit System as a vital component of a balanced,
multi-modal transportation system for Honolulu.

From a transportation standpoint, the proposed Rapid Transit System
will meet Honolulu's need for a transportation system which can effectively
operate in Honolulu's tight urban corridor with minimal requirements for
rights-of-way. The system will operate on its own grade-separated guideway to
give Oahu's residents consistent travel times and not be in the congestion and
traffic problems which automobiles, buses, and other road-based vehicles
face. It will serve Oahu's residents and visitors during peak, non-peak, and
weekend periods alike, and serve Honolulu well into the twenty-first century.

In providing rapid, consistent, high-quality service, the Rapid
Transit System will provide Oahu with marked transportation mobility
improvements. While the high cost of the system is acknowledged, it will help
lay the foundation for Oahu's economy to prosper and help improve the life
quality of its residents.

Our offices are currently working closely with the City and County's
Office of Rapid Transit in coordinating State rights-of-way and operational
matters. Coordination is being made with all of the State agencies who have
property, facilities, or operations on, or adjacent to, the proposed Rapid
Transit alignment.

The following are identified to be items which need to be further
addressed in the final EIS:
1. Pedestrian Access at Stations--The station plans currently do not reflect overhead pedestrian crossings to serve both sides of the highway at the Makalapa, Nimitz/Smith, and Nimitz/Fort Street Stations. Overhead pedestrian crossings need to be provided on both sides of the highway to eliminate pedestrian street level crossings for safety and traffic flow considerations.

2. Waialua Station Access and Egress--Access and egress improvements into the Waialua Station need to be implemented based on the Station's proposed park-and-ride, kiss-and-ride, and feeder bus operations. Both freeway and local road improvements are required. We are pleased that work has been initiated to provide for these improvements.

3. Sight Distance Analysis--Fixed guideway columns constructed in the highway median can obscure sight lines to other vehicles and existing traffic signals and traffic control signs. Sight distance analyses are required to effectively plan and locate the guideway columns and to modify or relocate median openings, signals, and signs.

4. Acquisitions--On page 5-21 on Acquisitions, although the guideway will be located in the highway median, preliminary engineering submittals for the project indicate that widening will be required at all of the Kamehameha Highway intersections.

5. Waikiki Master Plan--The proposed traffic flows contained in the SDEIS and the Waikiki Master Plans reflect needs to be closely coordinated and the traffic impacts at various intersections carefully evaluated.

6. Land Use--Desirable land use impacts along the transit alignment may not be realized without careful integration of the project with existing and proposed developments. Discussion of attendant measures to enhance benefits would provide a better understanding of the project's value to areas along the guideway alignment.

7. Development Impact--On page 5-29, under development impacts on agencies and groups, the following State agencies should also be listed:
   a. Aloha Tower Development Corporation for Aloha Tower.
   b. Department of Accounting and General Services for Aloha Stadium, and Pearl City and Liliha Civic Centers.
c. Department of Land and Natural Resources for Ke'ahal Lagoon.

d. University of Hawaii for Leeward and Honolulu Community Colleges.

8. General Excise Tax Receipts--The transit system's capital financial plan assumes an average growth rate in the GET surcharge revenue stream of 6.9% per year. The State Council on Revenues has recently revised its projections to reflect a more modest level of revenue growth.

9. Capital Cost Recovery--The SDEIS uses a 10-year capital cost recovery period. Because the system and train life is expected to be much longer than ten years, it would be helpful to extend the financial analysis over a much longer period. It would also be helpful to include the operating and maintenance costs to determine its value in comparison with the life cycles and costs of other alternatives.

10. Year 2005 Service Characteristics--Additional discussion on data reflected in Table 4.10 would be helpful. Explanation of factors such as how auto trips are diverted to transit, and vice versa, would provide a better understanding of transit's effect.

11. Discussion on Benefits--An expansion of the discussion of benefits of the guideway in comparison with other alternatives would be helpful. For example, a more thorough discussion of land use, social, and system life benefits is essential. The TSM alternative does not appear to include the full costs of roadway improvements and facilities costs in the analysis.

12. Station and Visual Impact--While there are discussions regarding the project's alignment and its visual and acoustical impact, there does not appear to be sufficient information detailing station and visual impacts. Photographic mock-ups portraying proposed stations in their actual surroundings would be helpful.

cc: Office of Rapid Transit
City and County of Honolulu
Governor, State of Hawai'i

c/o Office of Environmental Quality Control
220 South King Street, 4th Floor
Honolulu, Hawai'i 96813

Dear Governor Waihe'e:

Supplemental Draft Environmental Impact Statement (SDEIS)
Honolulu Rapid Transit Program
Ewa and Honolulu, O'ahu

This SDEIS supplements the information provided in the March 19, 1990, Alternative Analysis/Draft Environmental Impact Statement (AA/DEIS). The purpose of the SDEIS is to evaluate the social, environmental, and economic impacts of the amended locally preferred alternative (LPA) which is similar to AA/DEIS Alternative 8 (Kamehameha/Waikiki), except the Waikiki segment is eliminated, and the University/Metcalf terminus is changed to the University/Quarry terminus. One alignment option, the Maekauwila Option, moves the alignment one block south of Pohukaina Street and is elevated. The vehicle technology already has been selected and the proposed alignment would be 16.0 miles long, have 22 stations and four park and ride lotts, and a maintenance yard at the Navy Ewa Drum storage site.

The Environmental Center has reviewed the above referenced document with the assistance of Peter Flachsbarth, Urban and Regional Planning; James Roumasset, Economics; Henry Gee and Yu-Si Fok, Water Resources Research Center; George Tacka, Engineering; and Alex Buttaro, Environmental Center.

Transportation (Sections 3.2 and 4.0)

Travel time savings (Table 4.4) of $2.00/hr for non-work and $4.00/hr for work appear to be based on Federal guidelines and are probably greater for Honolulu.

1) Why did the Oahu Metropolitan Planning Organization use data from 1981 to estimate current ridership projections rather than extrapolating that data to accommodate changing assumptions?
2) Is light rail expected to significantly reduce the traffic burden on side streets and trunk capacity? If yes, will there be a concurrent reduction in noise and air pollution?

3) Table 4.13 (page 4-15) describes the expected change in annual vehicle miles traveled for both the TSM and Amended LPA. Does Table 4.13's calculations take into consideration the possible feedback effects of shifting from car to rail, such as the fact that off-peak hour drivers may switch back to peak hours due to the expected decrease in congestion?

Safety and Security (Section 5.3.3)

We were unable to locate any comparisons between the baseline safety impacts of the proposed project, the transportation systems management (TSM) and LPA alternatives.

The EIS should mention that light rail transit has a much lower fatality rate than the alternatives. A study of fatality rates for automobiles and rail transit indicates that in metropolitan areas there are 6.4 fatalities per million people traveling in automobiles, while there are only 0.7/million for rail transit (Regional Planning Association. Renaissance of Rail Transit in America. June 1991, page 83).

Visual and Aesthetic Resources (Sections 3.4 and 5.4)

This document inadequately describes the significant impacts upon the visual resources of the various stations and important viewplanes. The station descriptions should be further elaborated and photographic or computer generated montages should be provided for the significant views surrounding each station.

Air Quality (Sections 3.5 and 5.5)

The Air Quality section focused on carbon monoxide but did not discuss the particulate pollution of diesel fuel. Our reviewers suggest that a qualitative and quantitative description of such pollution would be helpful.

What are the comparative impacts between the alternatives with regard to automobile passenger exposure to in-vehicle pollution? We note that the rapid transit alternative should cause a much greater reduction of such pollution compared to the TSM alternative.

Energy (Section 5.9)

The energy savings analysis oversimplifies the relationship of saved gasoline consumption by equating it to diverted riders. Light rail is actually 6 times more efficient per mile than automobiles/driver (Regional Planning Association. Renaissance of Rail Transit in America. June, 1991, page 82).
Governor, State of Hawaii  
May 7, 1992

Socioeconomic Trends and Distribution (Section 5.1.3.5)

1) How is "Socioeconomic Trends and Distribution" defined in the context of this SDEIS?

2) What is the basis for the assertion that "the proposed TSM alternative or amended LPA would produce no substantive impact on the distribution or trends related to population, employment, housing, or income characteristics of the Honolulu area or within the study corridor" (page 5-4)?

We are concerned that the reader with limited specialized knowledge in economics or social demographics may not understand what the title "Socioeconomic Trends and Distribution" refers to. Our reviewers therefore suggest that this section be expanded to include better descriptions of the environmental elements it describes and the basis of the determination of no substantial impacts.

3) What are the socioeconomic effects of exacting a 0.5% increase in taxes given that the increase represents a larger percentage of lower income consumers' income than that paid by the higher income consumers?

Socioeconomic impacts of this project are not adequately addressed. Specifically, our reviewers expressed concern about the DEIS's inadequate discussion of impacts of this project on land use, population growth and distribution, employment, income, and social equity.

Regulatory/Local Guidelines

How does this EIS reconcile and prioritize the differing intentions and applicability of the FTA guidelines, Procedures and Technical Methods for Transit Project Planning; FTA/FHWA Regulations, Environmental Impact and Related Procedures, (August 1987); Council on Environmental Quality's Regulations for Implementing the Procedural Provisions for the National Environmental Policy Act (July 1986) and State of Hawai'i Title 11, Chapter 200, Environmental Impact Statement Rules (December 1985), to this project? The appropriateness and adequacy of this document depends on its ability to describe explicitly the relative reconciliation, prioritization, and applicability of the above mentioned Federal, State and County rules, guidelines, and laws. For instance, our reviewers have expressed concern over the cost effectiveness index (CEI), which may satisfy federal reviewers but is inadequate or inappropriate for the purposes of our review.
Governor, State of Hawaii
May 7, 1992

Economic Impacts (Section 5.1.5)

1) What will be the impact of a "tourist tax" on the employment and incomes of local residents?

2) What percent of the 0.5% increase in excise tax and state general fund allocations is expected to burden the resident consumer?

3) Can the use of rail transit increase state productivity due to decreased transit times?

4) Amortizing the $2 billion (1.7 billion in local costs converted to 1993 dollars) over a 10 year period, say at 8%, taxes would have to increase by roughly $300 million per year to pay for local construction costs. Increasing the excise tax to 4.5% would roughly provide only one-third to one-half of this amount. Does this present a potential problem of insufficient revenue? If yes, how might this problem be resolved?

5) What would be the economic impacts of subsidizing private operators by $1 per passenger-trip for non-fixed rail alternatives during rush hour? Our reviewers suggest that this option would incur only a small fraction of the cost of fixed rail. Additionally, financing the subsidy with a user-charge on use of congested arteries during rush hours would further reduce the net public expenditure to zero. Existing waste (commuters imposing external costs to one another) provides opportunities for costless gain. Mortgaging our future without exploring alternatives such as the above mentioned seems to constitute a very risky and potentially costly gamble.

The economic analyses suggested above were not intended to provide precise estimates, but rather to alert the public and preparers of this SDEIS that the economic analysis provided should be carefully scrutinized to eliminate any mistaken assumptions or implementation of more costly alternatives.

Our reviewers expressed serious concern with regard to the high cost to local residents and the risks of low ridership and/or cost overruns, given the available evidence, principles of public economics, and the political economy of public decision-making.

Financial and Cost Effectiveness Analysis (Sections 5.4 and 6.0)

1) How is the proposed project more effective than the many privatized programs that have already been suggested.

2) Is it feasible to stop the present subsidy system on parking?
Governor, State of Hawaii
May 7, 1992

3) How do proposals to provide computerized coordination for mini-vans and small (e.g. $40 per passenger month) subsidies for mini-buses compare to the proposed project.

4) Is the idea of implementing rush hour user fees administered by remote sensor devices and monthly statements sent for collection a practicable option? If no, why not?

5) To what extent does this fixed rail project foreclose the future options of lower cost, more flexible means of meeting Oahu's transportation needs, and the option of using the proposed excise revenues for the pressing need to upgrade current sewage lines and treatment facilities, parks and recreation projects, or reducing the burden of existing taxes?

6) How do the costs and benefits (environmental included) of Rapid Transit compare to a combination of existing programs and those suggested above? (N.B.: analysis of combined and separate should be provided.)

Our reviewers note that the alternatives we have suggested would lower the incentive for one-person-per-vehicle commuting and simultaneously generate revenue for other transit options.

7) What incremental improvement is provided by fixed rail relative to the next best alternative?

We note that large forecast errors have been made in numerous mainland transit projects where actual ridership fell far below those projected and actual capital and operating costs were substantially higher than projected.

8) To what extent is it possible that resident consumers may take on an even greater tax burden than presently projected to pay for the actual costs of transportation?

Our reviewers note that the comparison of buses to fixed rail fails to sufficiently factor in amortization and depreciation. The 10 year analysis failed to account for the fact that buses are typically replaced every 10-12 years while rapid transit components are replaced every 30-50 years. The rapid transit benefits are therefore understated in this context.

No Build Alternative (Sections 2.3.2.1 and 2.3.2.1)

This section should summarize the comparative environmental impacts of "No-build" and the proposed action.

How could the 0.5 percent revenue tax be used to fund other pressing infrastructural priorities such as improved sewage and drainage, and on what basis is rapid transit decidedly more beneficial?
Governor, State of Hawaii
May 7, 1992

Summary

Many of our reviewers favor the concept of "rapid transit," yet expressed grave concerns with regard to the environmental impacts and the costs and benefits of the project as described in this DEIS. Specifically, this document leaves serious questions unanswered regarding (1) reliability of ridership, construction, and operating cost projections; (2) the tax burden for resident consumers; and (3) whether alternative projects might better serve the community. Maximum flexibility should be maintained (up to initial construction) so that the project can be terminated if it becomes apparent during the project's evolution that costs will be higher than benefits.

Additionally, this document does not comply with the State of Hawai'i's environmental laws as described by Chapter 200 of Title 11 EIS Rules. The DEIS inadequately describes cumulative impacts and mitigative strategies in the context of Hawai'i's EIS Rules and entirely omits discussion of unresolved issues and compatibility with land use plans and policies (EIS Rules, Section 11-200-17[5-6]). This document also inadequately discusses or entirely omits disclosure of the interrelationships and cumulative environmental impacts of the proposed action and other related projects that may stimulate or induce secondary effects (Section 11-200-17[j]), local short uses of humanity's environment and the maintenance and enhancement of long-term productivity, the extent to which the proposed action forecloses future options and narrows the range of beneficial uses of the environment (Section 11-200-17[j]), and irreversible and irretrievable commitments to resources and the extent to which this project irreversibly curtails the range of potential uses (Section 11-200-17[k]). Although this DEIS may comply with NEPA and FHWA requirements, the aforementioned deficiencies make this document entirely inadequate with regard to the State of Hawai'i's environmental laws. If a single document complying both to NEPA and HRS 343 requirements cannot be prepared pursuant to Section 11-200-23(2), HAR, then the document so produced will not be acceptable according to the State of Hawai'i EIS Rules (Section 11-200-23[4]).

Thank you for the opportunity to review this document and we hope our comments are helpful.

Sincerely,

John T. Harrison, Ph.D.
Environmental Coordinator

cc: OEQC
Frank Doyle
Benjamin Lee
Roger Fujikoa
Peter Fischbacher
James Roumasset
March 27, 1992

MEMORANDUM

TO: Mr. Brian J.J. Choy
    Director, CEQC

FROM: Alan S. Hayashi

SUBJECT: HONOLULU RAPID TRANSIT PROGRAM SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT

The WCCA is pleased to comment on the Honolulu Rapid Transit program supplemental draft EIS.

With the current legislative mandate, the WCCA will develop a convention center in or near Waikiki. While the site has not been chosen at this date, the transportation of up to 15,000 persons per two-hour period should be considered in any traffic planning within Waikiki.

The City's master planning effort calls for a "people mover" to service the Waikiki area. If this people mover is deemed to be rapid transit or a combination of rapid transit and shuttles, we would hope that the planning would incorporate the convention center and its need to move large masses of people during a very short period. The WCCA would be happy to work with the proper entity when the convention center site is chosen and its load factor determined.

Should you wish to discuss this further, please call me at 586-2340.

ASH/gkm:1304

cc: Murray E. Towill

cc: Frank Doyle, Office of Rapid Transit, C & C
    Benjamin Lee, Dept. of General Planning, C & C
3.0 CITY AND COUNTY OF HONOLULU
Honorable John Waihee, Governor
Office of Environmental Quality
   Control
State of Hawaii
220 South King Street
Fourth Floor
Honolulu, Hawaii  96813

Attention:  Mr. Brian J. J. Choy, Director


Thank you for the opportunity to review and comment on the SDEIS for the proposed Honolulu Rapid Transit Program.

We have the following comments to offer:

1.  We have no objections to the Locally Preferred Alternative as proposed. Construction drawings should be submitted for our review and approval.

2.  The availability of water to the Rapid Transit Program's facilities will be determined when the building permits are submitted for our review and approval. When water is made available, the applicant will be required to pay our Water System Facilities Charges for source-transmission and daily storage.

3.  Waiawa Maintenance and Storage Facility:  The 8-inch water main from Waipahu Street to the Leeward Community College was installed by the Community College; therefore, any proposed use of this main for the Rapid Transit Facility will also require an approval from the Community College.

4.  The proposed facilities will be subject to our cross-connection control requirements prior to the issuance of the building permits.
The Honorable John Waihee  
Page 2  
May 6, 1992

5. The on-site fire protection requirements for the Rapid Transit System’s facilities, including the proposed Waiawa Maintenance and Storage Facility, should be coordinated with the Fire Prevention Bureau of the Honolulu Fire Department.

If you have any questions, please contact Bert Kuioka at 527-5235.

Very truly yours,

[Signature]

KAZU HAYASHIDA  
Manager and Chief Engineer

cc: Office of Rapid Transit  
Department of General Planning
March 25, 1992

Governor, State of Hawaii
C/o Office of Environmental Quality Control
220 South King Street, Fourth Floor
Honolulu, Hawaii 96813

Dear Sir:

Subject: Honolulu Rapid Transit Program Supplemental Draft Environmental Impact Statement (DEIS)

We have reviewed the Supplemental DEIS for the subject project and have no comments to offer.

Very truly yours,

[Signature]

FOR HERBERT K. MURAOKA
Director and Building Superintendent

JH:jo
cc: J. Harada
Office of Rapid Transit
Dept. of General Planning
March 19, 1992

Mr. Joseph M. Magaldi, Jr., Director
Department of Transportation Services
City and County of Honolulu
Honolulu Municipal Building
650 South King Street
Honolulu, Hawaii 96813

(VIA: MR. JEREMY HARRIS, MANAGING DIRECTOR)

Dear Mr. Magaldi:

Please provide a revised Schedule B for the rapid transit project based on the following assumptions. Schedule B refers to the "Rapid Transit Capital Financial Plan" attached to the development agreement between the City and State.

The revision is to use the same assumptions in the approved Schedule B concerning economic price adjustment rate, cost escalation rate, interest income rate, and bond interest rate and maturity date. County general excise and use tax revenues, however, are to be determined on the following assumptions:

(1) Between the fiscal year 1990-91 and fiscal year 1997-98, assume that surcharge revenues will be based on the same annual percentage changes as the those projected by the Council on Revenues for statewide general excise and use tax revenues. The Council on Revenues' latest projection, dated March 16, 1992, is attached; and

(2) Between the fiscal year 1997-98 and fiscal year 2002-03, assume that surcharge revenues will increase annually by 6.99 percent.

Transmittal of the revised Schedule B to me by April 3, 1992 would be appreciated.

Very truly yours,

[Signature]

ARNOLD MORGADO, JR., Chair
Honolulu City Council

Attachment
March 16, 1992

The Honorable John Waihee
Governor, State of Hawaii
State Office Tower
235 South Beretania Street
Honolulu, Hawaii 96813

Dear Governor Waihee:

Attached are the Council's revenue projections of general fund tax revenues, special fund tax revenues, general fund nontax revenues, and special fund nontax revenues.

General fund tax revenue estimates have been revised downward for fiscal years 1992 through 1998. For the first eight months of this fiscal year, general fund tax revenues are .7% less when compared to the results for the same period last year. The Council's short-term national economic outlook is perceived to be somewhat less optimistic. Although inflation is expected to subside somewhat over the next several years, the state total personal income, particularly wages, is forecast to grow at a slower rate. The State's construction activity is forecast to decline through fiscal year 1994, at which time a recovery of major proportions is anticipated. No changes were made to the outlook of the visitor industry.

In arriving at the general fund tax revenue estimates, the Council has considered existing laws only and that the State will not be subject to any unusual occurrences or any prolonged or crippling strikes.

As to the general fund nontax revenues, the Health Fund premium reimbursements increased by approximately $2.7 million and $3.0 million was set aside to guarantee interest of industrial loan companies' depositors. Special fund tax revenues are projected lower as a result of the downturn of tourism. The special revenue fund, special funds, will receive approximately $16.5 million in grants for the construction of the Kahului and Lihue Airports. Conversely, the Department of Health has reported reduced revenue streams.

Please advise me if I can answer any questions you may have.

Sincerely,

J. Ming Cheu
Chairman

Attachments
### Estimation of General Fund Tax Revenue

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<td><strong>8,926,641</strong></td>
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<td><strong>-3.6%</strong></td>
<td><strong>-1.8%</strong></td>
<td><strong>-2.0%</strong></td>
<td><strong>-1.3%</strong></td>
<td><strong>-2.0%</strong></td>
<td><strong>-1.7%</strong></td>
<td><strong>-1.3%</strong></td>
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<td><strong>170,585</strong></td>
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<td><strong>166,755</strong></td>
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<td><strong>WPI Total</strong></td>
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<tr>
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<td><strong>1.2%</strong></td>
<td><strong>2.4%</strong></td>
<td><strong>1.1%</strong></td>
<td><strong>3.5%</strong></td>
<td><strong>5.1%</strong></td>
<td><strong>7.3%</strong></td>
<td><strong>12.2%</strong></td>
<td><strong>8.1%</strong></td>
</tr>
</tbody>
</table>

1/ Does not include taxes paid under protest and now being held in an escrow account by the State. The balance in the insurance premium tax escrow account is $106.6 million.
2/ FY 1990 and FY 1991 transfer of $5.0 million into fund Reserve Fund. Annual transfer from general excise tax revenues of about $17 million into highway fund through FY 1991 and $90 million into educational facilities improvement special fund from FY 1990 to FY 1996. Annual transfer of 95% of transient accommodation taxa to the counties from FY 1991 to FY 1998.

03/12/92
April 6, 1992

Mr. Joseph M. Magaldi, Jr., Director
Department of Transportation Services
City and County of Honolulu
Honolulu Municipal Building
650 South King Street
Honolulu, Hawaii 96813

(VIA: MR. JEREMY HARRIS, MANAGING DIRECTOR)

By letter dated March 19, 1992, we requested information on a Revised Schedule B for the rapid transit project "Rapid Transit Capital Financing Plan," based on the March 16, 1992 Council on Revenues' projection which we had attached.

We have not yet received the information, and would earnestly request your attention to this item. The opportunity to review the soundness of the updated financial plan is critical and essential to timely commenting and action on both the Draft Supplemental EIS and Final EIS.

Thank you for your prompt attention.

Sincerely,

[Signature]

ARNOLD MORGADO, JR.
CHAIR

cc: Governor John Waihee, c/o OEJC
    Mr. Robert Hon
    Mr. Louis F. Hraz, Jr.

c: Frank Doyle, Office of Rapid Transit, C & C
  Benjamin Lee, Dept. of General Planning, C & C
Mr. Robert Hom  
Program Manager  
Federal Transit Administration  
U.S. Department of Transportation  
211 Main Street, Room 1160  
San Francisco, CA 94105

Dear Mr. Hom:

Under the current schedule for the Honolulu Rapid Transit Program, the final environmental impact statement will not be finished and approved until late summer or early fall. Accordingly, the Council will have very little time to review the final document before the October 1, 1992 deadline for adopting the general excise tax surcharge, as authorized by Act 184, 1990 Hawaii State Legislature.

Despite the short time for review, there will be heavy pressure on the Council to pass the excise tax surcharge because of the possibility for delays and cost overruns from missing the commencement date for construction now projected to be issued in November or December 1992.

The Council is in an untenable situation with the lack of updated information on the soundness of the project's capital financial plan vis-a-vis the state's downwardly revised excise tax surcharge revenue projections, as indicated by the attached sheet from the Council on Revenues.

Schedule B for the City's rapid transit project (phasing schedule of anticipated funding sources and costs) was originally based on 6.9% annual growth of the excise tax. Our request for updated information and financial plan based on the Council of Revenues dramatically downward revised projections has not been received to date (copy of March 19, 1992 letter enclosed).
Our need for updated information in both the draft supplemental EIS and the final EIS before public hearings are scheduled is critical for allowing timely review and comment by Councilmembers and the public.

Sincerely,

Arnold Morgado, Jr.
Chair

cc: Governor John Waihee c/o OEQC
Frank Doyle

c: Frank Doyle, Office of Rapid Transit, C & C
Benjamin Lee, Dept. of General Planning, C & C
April 23, 1992

I would like to begin by stating for the record that the City administration has not provided all the information necessary to adequately review and comment on the Supplemental Draft Environmental Impact Statement.

On March 19, 1992, I requested a revised financial plan based on the latest Hawaii State Council on Revenues' projections. In general, the Council on Revenues projections are considerably lower than those used by the City administration. The City administration has responded that their financial plan requires no revision, regardless of the Council on Revenues projections. Presumably they believe that the fiscal health and outlook for the State is irrelevant to their financial plan.

On March 27, 1992, a request was made for various "results reports" listed in the appendix of the SDEIS. Only today did I receive the official response to that request.

The City administration's failure to comply with these requests and provide the necessary information in a timely manner effectively prevents the public from obtaining a thorough review and full understanding of the SDEIS.

The following are my oral comments. Written comments will be submitted later.

1) The TSM Alternative. The "Expanded Bus" or "TSM" alternative, referred to in the SDEIS and against which fixed-rail is evaluated, is still "born to lose;" as was aptly described in the UH Evaluation.
The "Expanded Bus" alternative consists simply of a doubled bus fleet and already planned HOV lanes. It does not include any other TSM measures. As noted in the SDEIS, the primary problem with the expanded bus alternative is slow bus speeds in mixed traffic lanes. The City administration has made no effort to alleviate that problem, thereby enhancing and ensuring a comparatively better performance by fixed-rail.

2) Negligible Reduction In Traffic Congestion. Even with the defective "TSM" alternative, the traffic reduction benefits of a $2-billion fixed-rail are negligible. In comparison to the "Expanded Bus" alternative, fixed-rail results in only 1-percent fewer daily auto vehicle trips, and only 1-percent fewer annual auto vehicle miles traveled. Clearly, fixed-rail will not significantly reduce auto traffic.

3) Negligible Environmental Benefits. Because fixed-rail produces only a negligible reduction in traffic, other benefits, including environmental benefits, are also negligible. In comparison to both the "No Build" and "Expanded Bus/TSM" alternative, the air quality and energy conservation benefits of fixed-rail are minimal.

4) Information and Impact Analysis Omissions. The SDEIS contains major omissions in information and impact analysis, including:

- Impact of the General Excise and Use Tax Surcharge on small businesses, which will not qualify for a tax credit;

- Information on the "reduction in jobs from other sectors of the economy due to construction of the rapid transit system";
- Analysis of the tax surcharge's regressivity and impact on residents, especially those with low incomes;

- Analysis of the benefit of the rail project to auto travelers who will also pay for the project; and

- Impact on the State budget of the annual revenue loss due to the surcharge tax credit;

5) **Flawed Financial Plan.** Finally, the financial plan for the rail project is fatally flawed. The City administration's projected general excise and use tax surcharge growth rates are much higher than the State Council of Revenues' projected growth rates for statewide General Excise and Use Tax revenues. If the Council on Revenues' projections are applied to the financial plan it will collapse.

It is irresponsible for the City administration and the Federal Transit Administration to blatantly ignore the Council of Revenues' projections -- the exact same projections followed by the Legislature in cutting the State's education, health and welfare programs.

The City administration must be up front and honest with the people. Accordingly, a solid and truthful financial plan is essential. If funding rail transit will require a tax increase of more than one-half percent, or for a period longer than ten years, then that fact should be acknowledged now, prior to the final decision on this project!

Thank you for this opportunity to comment.
May 7, 1992

The Honorable John D. Waihee III, Governor
State of Hawaii
c/o Office of Environmental Quality Control
220 South King Street, Fourth Floor
Honolulu, Hawaii 96813

Dear Governor Waihee:


I request that the comments be reproduced verbatim in the final environmental impact statement for the project. The comments are written in a manner which minimizes the reader's need to simultaneously refer to the SDEIS. More importantly, I do not want the comments diluted by editing.

Very truly yours,

[Signature]

ARNOLD MORGADO, JR., Chair
Honolulu City Council

Attachment

cc: Mr. Frank J. Doyle
Manager and Chief Engineer
Office of Rapid Transit
COMMENTS ON SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR HONOLULU RAPID TRANSIT PROJECT

Page, table, figure, or section references apply to the SDEIS, unless otherwise noted.

PURPOSE AND NEED -- 1.0

(1) Page 1-14 includes the following statement:

Without the development of facilities to maintain and improve transit operating speeds and conditions, further declines in transit productivity can be expected by 2005.
(Underlining added)

Increased bus transit productivity may not necessarily require the "development of facilities." The operation of existing facilities may be changed to improve productivity. For example, productivity could be increased by raising the minimum vehicle occupancy for HOV lane use from two persons to three persons. The statement should be amended to recognize that more efficient use of existing facilities may also increase bus transit productivity.

(2) Page 1-17 includes the following statement:

The original LPA included a subway section along Hotel Street in downtown Honolulu. Detailed soil boring information obtained during preliminary engineering and further engineering studies indicated that subway construction would be unaffordable. Therefore, the adopted alignment was moved to Nimitz Highway, as proposed in Alternative 8 in the AA/DEIS.

A Hotel Street subway was part of the HART alignment in the 1982 Final EIS. Since a final EIS was previously approved for a Hotel Street subway, the geotechnical conditions should have been known. A statement should be included on the reasons those geotechnical conditions were unknown, despite completion and federal approval of the 1982 final EIS.

-1-
ALTERTIVES CONSIDERED — 2.0

Screening And Selection Process — 2.1

(3) Section 2.1.1 on page 2.1 lists various transportation studies. The list should include the HALI 2000 Alternatives Analysis (HALI 2000) with a summary of its findings.

HALI 2000 evaluates six alternatives and compares them against a "committed system" encompassing planned highway projects and a 600 bus fleet. Among the six are a TSM alternative, bus expansion alternative, and 14-mile heavy rail fixed guideway. Major components of the three alternatives are the following:

(A) TSM alternative:

(i) Peak period road congestion pricing. The charge is between $0.50 and $2.00 for each one-way trip, depending on distance;

(ii) An 880 bus fleet; and

(iii) Reversible HOV lanes on the H-1 Freeway from the Palailai Interchange to the Keahi Interchange and on Pali and Likelike Highways;

(B) Bus expansion:

(i) Fleet of 672 standard and 180 articulated buses;

(ii) Bus priority facilities from West Beach to Keahi Interchange, from Aina Koa to Downtown, and on Pali and Likelike Highways; and

(iii) Marine transit from West Beach and Ewa Beach to Downtown;

and

(C) Heavy rail fixed guideway:

(i) Fourteen-mile fixed guideway from Aloha Stadium to Kahala Mall, entirely grade separated; and

(ii) Fleet of 520 buses.

The following table provides selected transportation data for the alternatives.
Selected Transportation Data From HALI 2000
In Year 2000

<table>
<thead>
<tr>
<th>Resident Trips</th>
<th>TSM</th>
<th>Bus Expansion</th>
<th>Fixed Guideway</th>
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<tbody>
<tr>
<td>Total Person Trips</td>
<td>2,701,600</td>
<td>2,701,600</td>
<td>2,701,600</td>
</tr>
<tr>
<td>Person Trips By Auto</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>With 1 Person</td>
<td>926,800</td>
<td>959,400</td>
<td>955,100</td>
</tr>
<tr>
<td>With 2 Persons</td>
<td>813,600</td>
<td>813,900</td>
<td>810,900</td>
</tr>
<tr>
<td>With 3 Or More Persons</td>
<td>699,200</td>
<td>680,000</td>
<td>677,200</td>
</tr>
<tr>
<td>Total Person Trips By Auto</td>
<td>2,439,600</td>
<td>2,453,300</td>
<td>2,443,200</td>
</tr>
<tr>
<td>Person Trips By Public Transit And Share</td>
<td>262,000</td>
<td>248,300</td>
<td>258,500</td>
</tr>
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<td>Transit And Share</td>
<td>9.8%</td>
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<td>9.6%</td>
</tr>
<tr>
<td>Total Vehicle Trips</td>
<td>1,615,600</td>
<td>1,627,300</td>
<td>1,620,700</td>
</tr>
</tbody>
</table>

The TSM alternative results in the lowest total person trips by auto, highest transit trip share, and, consequently, the lowest total vehicle trips. In sum, the TSM alternative is the best at increasing auto occupancy and transit riding and decreasing traffic.

HALI 2000 offers two basic lessons.

The first is that a properly designed alternative combining an expanded bus fleet, HOV lane improvements, and TSM measures may provide transportation benefits comparable to a fixed guideway with feeder buses. HALI 2000 indicates that the doubling of the bus fleet alone is not an adequate baseline alternative. Although road pricing may not be practical, substitute TSM measures with equivalent effects may be available for combining with an expanded bus fleet. For example, HALI 2000 states that the doubling of all-day parking charges results in larger transit use increases than road pricing.

The second lesson is much simpler: a fixed guideway is not clearly superior to a properly designed bus and TSM alternative. A more objective alternatives analysis should have been performed for the AA/DEIS and SDEIS.

Definition Of Alternatives -- 2.2

(4) Page 2-4 sets forth the fare structure. An explicit statement should be included that the fares are assumed to rise with inflation.
(5) Section 2.2 commencing on page 2-3 should include the assumed bus speeds on HOV lanes, similar to the AA/DEIS. Page 2-5 of the AA/DEIS lists the assumed bus speeds as follows:

- H-1 -- Hāna of Waiau Interchange: 50 mph
- H-2 -- Mauka of Waiau Interchange: 40 mph
- H-3 -- Waiau Interchange to Keeaumoku Interchange: 40 mph
- Moanalua Freeway -- Aiea Interchange to Fort Shafter: 40 mph
- Makai Viaduct -- Keeaumoku Interchange to Pacific Street: 40 mph

(6) Figure 2.1 on page 2-5 appears to designate a short segment of King Street, rather than Hotel Street, as a "transit mall." The designation appears to be incorrect.

(7) Figure 2.1 does not designate a transit lane on Kalakaua Avenue through Waikiki. The omission appears to be incorrect.

(8) Figure 2.1 displays "exclusive transit lanes" on King Street, Beretania Street, Kapiolani Boulevard, and Kuhio Avenue. A description of the operation of the "exclusive transit lanes" should be included. If, however, the actual operation is not substantially different from that of mixed traffic lanes, the "exclusive transit lane" designations should be removed from Figure 2.1.

(9) Figure 2.1 includes the designation of the Makai Viaduct as an HOV/bus lane facility from the Middle Street Interchange to Pacific Street, near the OR&L Station. Certain proponents of the fixed guideway contend that the Makai Viaduct will have adverse visual and aesthetic impacts similar to the amended LPA. The proponents, however, are incorrect.

The Makai Viaduct runs over Nimitz Highway through the Iwilei and Kalihi Kai industrial areas and does not come near the waterfront, except in the vicinity of the Dole Cannery. Thus, the Makai Viaduct will not block views of the waterfront. Furthermore, the Iwilei and Kalihi Kai areas are intended to remain in industrial use.

Unlike the Makai Viaduct, the amended LPA is elevated along Nimitz Highway from near the OR&L station until the Federal Building. Basically, the amended LPA's Nimitz segment:

(A) Begins where the Makai Viaduct ends;
(B) Is adjacent to the waterfront; and

(C) Proceeds through a planned residential/commercial/recreational area.

Thus, the visual and aesthetic impacts of the amended LPA are much more adverse than the impacts of the Makai Viaduct.

Under the Oahu Regional Transportation Plan, the Makai Viaduct will be constructed even if the amended LPA is approved. Thus, an argument cannot be made that the amended LPA will result in elimination of the Makai Viaduct and its negative visual impact.

Alternative 2: Transportation System Management -- 2.2.1.2

(10) On April 25, 1989, the Urban Mass Transportation Administration published proposed rules concerning the "major capital investment project process" in Volume 54, No. 78, of the Federal Register. Section 611.5 defines the expanded bus, or TSM, alternative as follows:

"Transportation system management (TSM) alternative" means a package of low to moderate cost improvements designed to make more efficient use of an existing transportation system. TSM alternatives typically include such actions as expanded bus service, high occupancy vehicle lanes that do not require major new construction, fringe parking, paratransit and ridesharing incentives, traffic engineering, and regulatory and pricing strategies to increase ridesharing and transit use.

The reasons should be specified for the City administration's formulation of an expanded bus, or TSM, alternative involving only a doubling of the bus fleet and HOV lanes. Absent from the alternative are measures to increase the efficiency of "existing transportation system" or "ridesharing and transit use."

(11) Resolution 90-284, CD-1, which selected the original LPA, includes the following Council directive:

BE IT FURTHER RESOLVED that the PE/FEIS phase will include a review and refinement of viable "transportation systems management" (TSM) options which
will serve as the benchmark for the FEIS and the overall study.

The City administration apparently has taken no action to fulfill that Council directive. An explanation of the nonaction should be provided.

(12) An Evaluation Of The Honolulu Rapid Transit Development Projects Alternatives Analysis And Draft Environmental Impact Statement (UH Evaluation), dated February 1991, by the University of Hawaii includes the following statement on page 79:

The City's choice of the Kamehameha Highway/Hotel Street fixed guideway alignment as the locally preferred alternative appears to qualify for a thirty percent share of federal funding under UMTA's capital over-match program. This alternative will need to be supplemented by supportive public policies: e.g., zoning for higher densities; lower parking requirements around stations; the coordination of the fixed guideway system with feeder buses; and pricing, regulatory and traffic control measures intended to discourage automobile use. The purpose of these policies is to provide incentives for using transit and disincentives for commuting by automobile. UMTA recommends and we concur that these policies should be considered as early as the preliminary engineering phase. However, we recommend that disincentives on automobile use be withheld until after the system is built. (Underscoring added)

Notwithstanding the change of the LPA, the statements on "supportive public policies" remain pertinent. A discussion should be included on the City administration's efforts during the PE/FEIS phase on formulation of the "supportive public policies," especially "pricing, regulatory and traffic control measures intended to discourage automobile use." The City administration should specify its intentions regarding future implementation of "pricing, regulatory and traffic control measures" after the system is built.

The Amended LPA -- 2.2.2

(13) The legend for Figure 2.9 on page 2-22 should read "Waikiki Shuttle."
(14) Page 2-23 states: "The time between peak-period trains would be approximately 100 seconds." Headways for the other operating periods are not provided. The omission should be corrected by listing the headways for all operating periods in a manner similar to page 2-16 of the AA/DEIS.

(15) Page 2-23 states:

All trains would serve Waiawa, Lagoon, Dillingham Plaza, Nimitz/Smith, Nimitz/Fort, Pohukaina/South; Ward, Ala Moana Center, Kalakaua/Kapiolani, University/King, and University/Quarry Stations. The other stations would be served, alternately, by one-half the trains in service.

(A) The statements appear to describe the skip-stop mode. If that interpretation is correct, an express statement should be included using the term "skip stop mode."

(B) The stations which will be skipped should be listed.

(C) Section 5.2.1 of the "Technical Provisions" of the Request For Proposals states:

The normal operating mode for both the Main Line and Waikiki Line shall be a pinched loop, with trains operating between the two end stations of each route. All trains shall stop at each station on their route.

(Underscoring added)

The reasons should be provided for departing from the "normal operating mode." The compliance of the skip-stop mode with other specifications in section 5.0 of the "Technical Provisions" also should be addressed.

(16) Section 2.2.2.2 commencing on page 2-24, concerning the physical characteristics of the fixed guideway, should include descriptions of the height of the guideway through and stations in each section.

(17) Page 2-50 describes the University area park-and-ride lots.

(A) The capital cost, including land acquisition cost, of each lot should be specified.
(B) Clarification should be provided on whether the capital cost of at least one of the lots is included in tables 2.6 and 2.7 on page 2-57.

(C) The number of spaces in each University area park-and-ride lot is few relative to those in the Waikiki, Aloha Stadium, and Lagoon lots. Each University area lot appears inadequate to serve the East Honolulu population.

(D) The Oasis property is more than one-half mile from a station. A park-and-ride lot that distance from a station appears to be of questionable worth.

Capital Costs -- 2.3

(18) Section 2.3 commencing on page 2-50 discusses the capital cost of the amended LPA, with and without the Halsekauila option. In the final EIS, the discussion also should reflect the $6 million for additional station mezzanines, as specified in communication D-312, dated March 23, 1992.

(19) Section 2.3 also should include a statement that the amended LPA's capital cost does not reflect change orders under the system contract.

(20) Section 3.7 of the "Technical Provisions" of the Request For Proposals sets forth the minimum design lives of fixed guideway components as follows:

Guideways, stations, the M&SF [Maintenance and Storage Facility], and CCF [Central Control Facility], and all other Fixed Facility structures provided under this Contract shall have a design life of fifty (50) years. All guideway running surfaces and guidance equipment, including guideway switches, shall have a design life of thirty (30) years. ATC [Automatic Train Control] and communication equipment shall have a design life of thirty (30) years. Power Distribution System Substations (transformers and rectifiers) and switchgear shall have a design life of thirty (30) years. Power rails shall have a design life of fifteen (15) years. All wiring and cabling shall have a design life of thirty (30) years. The design lives of the vehicle subsystems are
given in TP Section 9.5 [as 25 years]. All other major System equipment elements shall have a design life of fifteen (15) years.

The cost to reconstruct, renovate, or replace fixed guideway components upon exhaustion of the useful lives should be discussed. The issue may have major cost implications in the future and should be addressed, even if reconstruction, renovation, or replacement is expected to occur after 2005.

**Operating And Maintenance Cost -- 2.4**

(21) Page 2-58 states:

Comparing the TSM Alternative to the No-Build Alternative, it can be seen in Table 2.8 that O&M costs would increase significantly, to about $148 million, as would be expected for an increase in the bus fleet.

Fairness requires addition of a statement that, in comparison to the no build alternative, the operating and maintenance cost of the amended LPA would increase significantly, to about $144.5 million.

**AFFECTED ENVIRONMENT -- 3.0**

(22) Table 3.1 on page 3-9 lists proposed development projects within the amended LPA corridor. A "second University of Hawaii parking structure" is listed. Discussion should be provided on:

(A) The parking structure's impact on transit patronage; and

(B) The wisdom of the State in constructing a parking structure so near a transit station.

(23) Table 3.1 also lists various proposed commercial and high density residential projects. Changes to the parking requirements for the proposed projects should be addressed to complement the availability of and maximize the use of the fixed guideway. Immediate address of the issue is necessary, since many of the proposed projects are still in the planning stage.
TRANSPORTATION IMPACTS -- 4.0
On-Board Bus Survey Final Report -- Task 3.1

(24) Page 16 of the On-Board Survey Final Report (Survey Report) discusses the creation of the file of survey responses. Questionnaires were given to all passengers over the age of six who boarded the sampled buses. Responses, however, were subject to the total discretion of the passengers and, apparently, were not controlled. Discussion should be provided in the Survey Report on whether the survey methodology conforms to scientific sampling procedures.

(25) Page 17 of the Survey Report states the following:

The final number of weekday responses that were used for modeling purposes is 9,361 (or 20.5% of the [45,576] questionnaires distributed on the sample bus trips completed on weekdays).

Discussion should be provided in the Survey Report on the acceptability of the response rate for modeling purposes.

(26) Table 4 on page 17 of the Survey Report indicates that, for the weekday survey, 14,084 questionnaires were returned. Of that amount, 9,361 had complete data that could be used. Approximately 33 percent of the returned questionnaires could not be used. Discussion should be provided in the Survey Report on whether the completion rate is indicative of a well prepared questionnaire and acceptable for expansion into total trips.

(27) Page 22 of the Survey Report, with respect to ridership estimates, states:

On an average weekday in 1991, there were approximately 239,860 boardings made on TheBus system. Also based on factoring the responses from the 1991 On-Board Bus Survey, those boardings were made by riders making approximately 206,650 linked trips.

Footnote 22 on the same page indicates that the 1986 survey estimated 229,600 unlinked trips and 187,700 linked trips. The following displays the differences in linked and unlinked trips between the 1991 and 1986 surveys.
Unlinked And Linked Trips
Differences Between
1991 And 1986 Surveys

<table>
<thead>
<tr>
<th>Type Of Trip</th>
<th>1991</th>
<th>1986</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unlinked Trips</td>
<td>239,860</td>
<td>229,600</td>
<td>10,260 (4.5%)</td>
</tr>
<tr>
<td>Linked Trips</td>
<td>206,650</td>
<td>187,700</td>
<td>18,950 (10.1%)</td>
</tr>
<tr>
<td>Linked Trips As %</td>
<td>86.2%</td>
<td>81.8%</td>
<td>4.4%</td>
</tr>
<tr>
<td>Of Unlinked Trips</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The reasons should be specified in the Survey Report for the higher percentage of linked trips under the 1991 survey in comparison to the 1986 survey.

(28) In table 8 on page 27 of the Survey Report, Downtown and Waikiki are the destinations of the highest percentage of total trips and peak period work trips. The amended LPA, with a fixed guideway at the edge of Downtown and no line through Waikiki, is not conducive to present transit ridership characteristics, given the following:

(A) Relatively high percentage of transit riders, approximately 86 percent, who access the bus by walking;

(B) Relatively high percentage of transit riders, approximately 87 percent, who walk to their destinations after egressing the bus;

(C) Relatively high percentage of transit riders, between 73 and 75 percent, who walk up to two blocks only to access or after egressing the bus;

(D) Relatively low percentage of transit riders, approximately 7 percent, who transferred to the sampled bus from another bus; and

(E) Relatively low percentage of transit riders, approximately 9 percent, who transferred from the sampled bus to another bus.

(29) A discussion on trip origins and destinations is presented on pages 25 and 28 of the Survey Report. The discussion describes the following major origin-destination pairs:

The destination of the greatest number of weekday bus riders, accounting for 26 percent of all trips, is Downtown Honolulu (District.
1. The majority of riders destined for Downtown Honolulu began their bus trips in District 6 -- Waikiki (19 percent), and District 11 -- Kalihi Valley (13 percent). Districts 5 (Makiki), 7 (McCully) and 9 (Kaimuki), at 7 percent each, also account for relatively large shares of origins of riders headed to Downtown Honolulu. All of these areas are densely populated, with high concentrations of transit dependent persons.

** **

Waikiki (District 6) and Kalihi Valley (District 11) are the areas with the greatest percentages of TheBus riders' trip origins, 16 and 13 percent, respectively. The majority of riders who begin their bus trips in Waikiki, 31 percent, end their trips in Downtown Honolulu. Other large proportions of persons boarding TheBus in Waikiki are traveling within Waikiki or to Ala Moana (District 4), 13 percent and 12 percent, respectively. A similar pattern exists for trips originating in the Kalihi Valley-Kapalama area (District 11). The majority of those bus riders, 27 percent, end their trips in downtown, [sic] and another 17 percent end in District 11.

** **

District 1 (Downtown Honolulu) is the destination for nearly 40 percent of all peak period home-based work trips, while District 6 (Waikiki) is the destination of another 13 percent of those trips. Over half of the home-based work trips made by bus riders traveling to Downtown Honolulu during peak commute hours originate in Kalihi -- District 11 (13 percent), Makiki -- District 5 (8 percent), and Districts 6 [Waikiki], 7 [McCully/Moiliili], 9 [Kaimuki/Kahala] and 21 [Kaneohe] (each with 7 percent). The area with the single largest percentage of home-based work trips made by bus riders traveling to Waikiki is District 11 (21 percent). (Footnotes omitted)

From the discussion, a generalization is apparent. The major origin-destination pairs in 1991 are served by bus routes 1 and 2. Both urban trunk routes travel through the middle of the

-12-
Honolulu urban core. Both travel through Downtown on Hotel Street and King Street. In the areas Koko Head of Downtown, the routes run on King Street and Beretania Street. In the areas Ewa of Downtown, the routes run on King Street and School Street. According to the Draft Short-Range Transit Plan Update: Fiscal Year 1993, routes 1 and 2 have the following weekday characteristics in fiscal year 1991-92:

**Weekday Characteristics Of Routes 1 And 2 In Fiscal Year 1991-92**

<table>
<thead>
<tr>
<th>Route</th>
<th>Daily Revenue Hours</th>
<th>Daily Revenue Miles</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Kaimuki (Hawaii Kai) -- Kalihi</td>
<td>349.90</td>
<td>3,539</td>
</tr>
<tr>
<td>2 Waikiki -- Liliha</td>
<td>421.90</td>
<td>3,281</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>771.80</strong></td>
<td><strong>6,820</strong></td>
</tr>
</tbody>
</table>

Under the amended LPA, the routes will change substantially. A bus operating plan has been submitted to the Council through communication D-1049, dated November 7, 1991. Under the plan, the following urban trunk bus routes appear similar to routes 1 and 2:

(A) Route 8 Kapahulu -- School/Middle Streets;

(B) Route 20 Waikiki -- School/Middle Streets; and

(C) Route 23A Kaimuki -- Kalihi/King Streets.

The following table compares the daily vehicle hours and daily vehicle miles for routes 1 and 2 under the present bus system and routes 8, 20, and 23A under the amended LPA.
Comparison of Bus Routes
Routes 1 and 2 Under Present Bus System In Fiscal Year 1991-92
And
Routes 8, 20, and 23A Under Amended LPA In 2005

<table>
<thead>
<tr>
<th>Bus Route</th>
<th>Daily Revenue Hours</th>
<th>Daily Revenue Miles</th>
</tr>
</thead>
<tbody>
<tr>
<td>Present Bus System -- FY 1991-92</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Route 1 Kaimuki/Hawaii Kai -- Kalihi</td>
<td>349.90</td>
<td>3,539</td>
</tr>
<tr>
<td>Route 2 Waikiki -- Liliha</td>
<td>421.90</td>
<td>3,281</td>
</tr>
<tr>
<td>TOTAL For Present Bus System</td>
<td>771.80</td>
<td>6,820</td>
</tr>
<tr>
<td>Amended LPA -- 2005</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Route 8 Kapahulu -- School/Middle Sts.</td>
<td>96.71</td>
<td>848.83</td>
</tr>
<tr>
<td>Route 20 Waikiki -- School/Middle Sts.</td>
<td>215.83</td>
<td>1,891.81</td>
</tr>
<tr>
<td>Route 23A Kaimuki -- Kalihi/King</td>
<td>114.53</td>
<td>961.11</td>
</tr>
<tr>
<td>TOTAL For Amended LPA</td>
<td>427.07</td>
<td>3,701.75</td>
</tr>
<tr>
<td>DIFFERENCE BETWEEN PRESENT BUS SYSTEM AND AMENDED LPA</td>
<td>344.73</td>
<td>3,118.25</td>
</tr>
</tbody>
</table>

The reduction of service on the major urban trunk routes through the King Street/Beretania Street/Hotel Street/School Street corridor may have a detrimental impact on transit ridership. A discussion should be provided in the final EIS on the impact on transit ridership from the substantially reduced urban trunk route bus service through that corridor.

(30) The following expands the table under comment (29) to include additional urban trunk bus routes between Kaimuki and Pearl Harbor which travel through Downtown.
Comparison Of Bus Routes
Routes 1, 2, 3, And 9 Under Present Bus System
In Fiscal Year 1991-92
And
Routes 8, 16, 20, 23, and 23A Under Amended LPA
In 2005

<table>
<thead>
<tr>
<th>Bus Route</th>
<th>Daily Revenue Hours</th>
<th>Daily Revenue Miles</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Present Bus System -- FY 1991-92</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Route 1 Kaimuki/Hawaii Kai -- Kalihi</td>
<td>349.90</td>
<td>3,539</td>
</tr>
<tr>
<td>Route 2 Waikiki -- Liliha</td>
<td>421.90</td>
<td>3,281</td>
</tr>
<tr>
<td>Route 3 Kaimuki -- Pearl Harbor</td>
<td>198.85</td>
<td>2,144</td>
</tr>
<tr>
<td>Route 9 Palolo -- Downtown</td>
<td>63.80</td>
<td>604</td>
</tr>
<tr>
<td><strong>TOTAL For Present Bus System</strong></td>
<td>1,034.45</td>
<td>9,568</td>
</tr>
<tr>
<td><strong>Amended LPA -- 2005</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Route 8 Kapahulu -- School/Middle Sts.</td>
<td>96.71</td>
<td>848.83</td>
</tr>
<tr>
<td>Route 16 Waikiki -- Hickam</td>
<td>95.09</td>
<td>1,013.64</td>
</tr>
<tr>
<td>Route 20 Waikiki -- School/Middle Sts.</td>
<td>215.83</td>
<td>1,891.81</td>
</tr>
<tr>
<td>Route 23 Palolo -- Aloha Stadium</td>
<td>85.31</td>
<td>804.43</td>
</tr>
<tr>
<td>Route 23A Kaimuki -- Kalihi/King</td>
<td>114.53</td>
<td>961.11</td>
</tr>
<tr>
<td><strong>TOTAL For Amended LPA</strong></td>
<td>607.47</td>
<td>5,519.82</td>
</tr>
<tr>
<td><strong>DIFFERENCE BETWEEN PRESENT BUS SYSTEM AND AMENDED LPA</strong></td>
<td>426.98</td>
<td>4,048.18</td>
</tr>
</tbody>
</table>

As is displayed, the difference in bus service remains substantial. A discussion should be provided in the final EIS on the impact on transit ridership from the substantially reduced urban trunk route bus service between Kaimuki and Pearl Harbor.

(31) Page 41 of the Survey Report, with respect to the calculation of linked trips, states:

While the information about transfers presented above may be correct, the transfer rate used to calculate the linked trips, shown in Table 5, was developed from the access/egress mode response. This is because the information presented above was taken directly from the rider's responses to Question 11 -- where the riders were asked how many buses they were riding to get from their origin to their destination. Unfortunately, many people consider a one-way
trip to be the same as a round trip and their responses to Question 11 could have reflected that type of confusion.

(A) The explanation on the method of calculating linked trips is insufficient. Additional explanation is necessary in the Survey Report.

(B) Returned questionnaires with contradictory responses to question 11, on the number of buses used, and questions 5 and 10, on the access/egress mode to or from the sampled bus trip, should be invalidated. Because of the contradictory responses, those questionnaires should not be part of the file used for modeling purposes.


UMTA has attempted to force agencies to acknowledge the cost of feeder buses and other services described in their alternatives analysis [on new start projects]. In the past, agencies have described extensive feeder bus services to enhance ridership forecasts as well as other measures to boost cost-effectiveness, such as higher parking fees. However, when the system was built, the agencies found that their optimistic forecasts for costs could not be achieved. Faced with limited budgets, they raised fares and parking fees and reduced service on feeder and other bus routes. The results were reduced costs, but also reduced ridership. The projects can become "white elephants" because they are no longer an attractive transit alternative.

(Underscoring added)

An analysis should be provided in the final EIS on the impact which reduced bus service may have on transit ridership and operating and maintenance cost under the amended LPA.

(33) Page 18 of the Survey Report explains the application of the expansion factors to the survey responses. The following is a table with a simplified expansion factor applied to bus trips in each type of service. The expansion factor is passenger

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boardings, as represented by surveys distributed, per bus trip sampled. According to the methodology described, the number of surveys distributed is equivalent to the number of passengers over 6 years of age who boarded the bus trips sampled. For the purpose of the table, the expansion factor and total boardings are calculated as follows:

\[
\text{EXPANSION FACTOR} = \frac{\text{Surveys Distributed}}{\text{Bus Trips Sampled}}
\]

\[
\text{TOTAL BOARDINGS} = \text{Expansion Factor} \times \text{Total Bus Trips In Type Of Service}
\]

**Total Boardings In 1991**

<table>
<thead>
<tr>
<th>Urban Trunk</th>
<th>Urban Collector</th>
<th>Suburban Trunk</th>
<th>Suburban Feeder</th>
<th>Express</th>
</tr>
</thead>
<tbody>
<tr>
<td>21,061</td>
<td>7,590</td>
<td>13,264</td>
<td>1,496</td>
<td>2,165</td>
</tr>
</tbody>
</table>

| Surveys Distributed (Equivalent To Passenger Boardings) | 254 | 246 | 213 | 88 | 41 |
| Expansion Factor (Surveys Distributed / Bus Trip Sampled) | 83  | 31  | 63  | 17 | 53 |

| Total Bus Trips In Type Of Service | 1,690 | 638 | 858 | 219 | 186 |
| Boardings After Expansion | 140,270 | 19,778 | 54,054 | 3,723 | 9,858 |

**TOTAL BOARDINGS = 227,685**

The expansion factor is acknowledged to be very simplified. The 227,685 boardings, however, are 12,175, or approximately 5 percent, less than the 239,860 boardings calculated in the 1991 survey.

**Service And Patronage Forecasting Methodology -- Task 3.03**

(34) The final EIS should list the following 1990 and 2005 data for each transportation district used in the trip tables: population, households, employment, retail and service industry, school age children, and hotel and resort condominium units. Most of the data is in the 1992 Service And Patronage Forecasting Methodology ( Patronage Methodology).

(35) Page 4 of the 1992 Patronage Methodology states:
The year 2005 demographic projections used in the AA/DEIS were based upon the series M-K, Population and Economic Projections for the state of Hawaii prepared in late 1988. Projections for the PE/FEIS are based upon new base year data for 1990 available from the Census Bureau STF1 file and State Department of Labor Statistics.

The population and employment projections for 2005 used in the SDEIS are not the same as the State's series M-K projections. The statement should clarify the agency which made the projections for the SDEIS. Clarification also is necessary on when the projections were made. If made prior to the national and State economic problems, the projections of population and employment may be overestimated. The clarifications should be included in both the final EIS and 1992 Patronage Methodology.

(36) For the patronage projections under the SDEIS, the following growth factors are used, according to page 86 of the 1992 Patronage Methodology:

Growth Factors Under SDEIS

<table>
<thead>
<tr>
<th>Trip Purpose</th>
<th>Percentage Growth Between 1990 and 2005 = Growth Factor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Home-Based Work</td>
<td>Households</td>
</tr>
<tr>
<td>Production</td>
<td>Employment</td>
</tr>
<tr>
<td>Attraction</td>
<td></td>
</tr>
<tr>
<td>Home-Based School</td>
<td>Population</td>
</tr>
<tr>
<td>Production</td>
<td></td>
</tr>
<tr>
<td>Home-Based Other</td>
<td>Households</td>
</tr>
<tr>
<td>Production</td>
<td>Service and Retail Employment</td>
</tr>
<tr>
<td>Attraction</td>
<td></td>
</tr>
<tr>
<td>Non Home Based</td>
<td>Employment</td>
</tr>
<tr>
<td>Production</td>
<td></td>
</tr>
<tr>
<td>Attraction</td>
<td>Employment</td>
</tr>
<tr>
<td>Visitor</td>
<td>Resort Condo and Hotel Units</td>
</tr>
<tr>
<td>Production</td>
<td></td>
</tr>
</tbody>
</table>

For the AA/DEIS, a simplified growth factor was used because of the absence of sufficiently detailed information from the 1986 bus survey to formulate the appropriate factors. The simplified growth factor was the percentage change of population plus employment between 1985 and 2005, expressed as follows:

Growth Factor = \[
\frac{2005 \text{ Population} + \text{Employment}}{1985 \text{ Population} + \text{Employment}}
\]

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An important factor to note is that population was used, although household projections were also available during preparation of the AA/DEIS.

Notwithstanding the simplified growth factor, the 1989 Service And Patronage Forecasting Methodology describes the "appropriate" growth factors on pages 3-6 and 3-7.

The appropriate basis for calculation of the factors varies by trip purpose. For work trips, the calculation includes population and total employment. For school trips, it includes population only, since no information is available on school employment or enrollment by zone. For other resident trips, the calculation includes population plus service and retail employment on the assumption that most "other" trips are attracted to service and retail land uses. Finally, the calculation for visitor trips includes dwelling units occupied by visitors (hotels plus condominiums) only. For visitor trips in locations that are visitor attractions rather than residences (including the airport and the Arizona Memorial), calculation of the growth factor includes the projected increase in tourist travel to Oahu. This approach reflects [sic] the likelihood that a ten percent increase of tourist travel to the island would increase tourist travel to the various tourist attractions in the transit service area by the same amount.

The following table compares, on an islandwide basis, the actual growth factors used for the SDEIS and the "appropriate" growth factors identified in the 1989 Patronage Methodology for the AA/DEIS. Comparison for non-home-based trips is not included because the 1989 Patronage Methodology does not explicitly specify the "appropriate" growth factor.
Islandwide Increase Of
Growth Factors
From 1990 To 2005

<table>
<thead>
<tr>
<th>Trip Purpose</th>
<th>SDEIS</th>
<th>AA/DEIS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Home-Based Work</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Production</td>
<td>22% (Households)</td>
<td>11% (Population)</td>
</tr>
<tr>
<td>Attraction</td>
<td>16% (Employment)</td>
<td>16% (Employment)</td>
</tr>
<tr>
<td>Home-Based School</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Production</td>
<td>11% (Population)</td>
<td>11% (Population)</td>
</tr>
<tr>
<td>Home-Based Other</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Production</td>
<td>22% (Households)</td>
<td>11% (Population)</td>
</tr>
<tr>
<td>Attraction</td>
<td>--* (Service/Retail Employment)</td>
<td>--* (Service/Retail Employment)</td>
</tr>
<tr>
<td>Visitor</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Production</td>
<td>35% (Resort Condo &amp; Hotel Units)</td>
<td>35% (Resort Condo &amp; Hotel Units)</td>
</tr>
</tbody>
</table>

*Percentage unknown because information unavailable.

As is displayed in the table, the major differences between the actual growth factors used in the SDEIS and "appropriate" growth factors identified for the AA/DEIS occurs for home-based work and home-based other trips. Under the SDEIS, the number of households is used as the growth factor for productions. Under the AA/DEIS, the "appropriate" growth factor is identified as population. The difference is significant. On an islandwide basis, the number of households is projected to increase by 22 percent from 1990 to 2005. In contrast, population is projected to increased by only 11 percent during the same period.

The use of households, rather than population, results in a substantially increased growth factor for home-based work trips and home-based other trips. According to table 9 on page 33 of the Survey Report, 36 percent of bus riders in 1991 were on home-based work trips and 25.5 percent were on home-based shopping or other trips. Thus, for the patronage projection under the SDEIS, the substantially higher growth factor is applied to approximately 60 percent of total transit trips.

(37) Section 6.1 on page 86 of the 1992 Patronage Methodology attempts to justify the use of households, rather than population, as the growth factor for trip productions.

Another refinement in this phase is the use of household estimates to reflect changes at the production end rather than population. Most trip generation models employ a trip rate per household as the unit of production, rather than population. The use of
households better respond to changes in household size, labor force participation, and income level (and consequently auto ownership), which taken together are thought to underlie trip frequency decisions.

The attempted justification, however, is not persuasive for the following reasons.

(A) Although household projections were available in 1989, the simplified growth factor used to project patronage in the AA/DEIS was based on population. The patronage subconsultant for the AA/DEIS probably would have used households if that served as a better indicator of trip generation.

(B) Although the 1991 survey elicited information on household income and auto ownership, projections of income and auto ownership characteristics in 2005 are not made for the SDEIS patronage forecast. The absence of projected characteristics is confirmed by a statement on page 87 of the Survey Report concerning an unrelated subject:

Residential proxy zone selection is based primarily upon geographic consideration, since socioeconomic data such as household income is unavailable for the forecast year.
(Underlining added).”

In essence, the model assumes that the income and auto ownership characteristics in 1991 will remain constant until 2005. That assumption may be incorrect. According to the State Department of Business, Economic Development and Tourism’s series M-K projections, per capita income in Honolulu will increase by 20.3 percent during the planning period, from $14,300 (1982 dollars) in 1990 to $17,200 (1982 dollars) in 2005.

Transit riders have a lower median income than all Oahu residents, according to the 1991 survey. Furthermore, a fairly substantial percentage, approximately 30 percent, of transit riders live in households which do not own autos. Thus, the rise in per capita income and, "consequently auto ownership," is not favorable to transit ridership.

(C) No data appears to have been collected on trip generation rates per household. The 1991 survey does not request the information in the questionnaire distributed. Nor does it appear that a separate survey
was taken during the PE/FEIS phase on trip generation rates of Oahu's households.

(38) To discern the ramifications of the change in growth factors, the following table compares the percentage changes between 1990 and 2005 of households and population for each of the transportation districts. Data are taken from tables 2.2 and 2.3 on pages 13 and 14 of the 1992 Patronage Methodology.

Percentage Change Between 1990 And 2005 Of Households And Population For Transportation Districts

<table>
<thead>
<tr>
<th>District</th>
<th>% Change Of Households</th>
<th>% Change Of Population</th>
<th>Pop % Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Downtown</td>
<td>+ 67</td>
<td>+ 46</td>
<td>+ 21</td>
</tr>
<tr>
<td>Kakaako</td>
<td>+326</td>
<td>+368</td>
<td>(- 42)</td>
</tr>
<tr>
<td>Beretania/Sheridan</td>
<td>+ 63</td>
<td>+ 50</td>
<td>+ 13</td>
</tr>
<tr>
<td>Ala Moana Center</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Makiki/Makiki Heights</td>
<td>+ 5</td>
<td>(- 2)</td>
<td>+ 7</td>
</tr>
<tr>
<td>Waikiki</td>
<td>(- 38)</td>
<td>(- 29)</td>
<td>(- 9)</td>
</tr>
<tr>
<td>McCully/Moiliili</td>
<td>+ 14</td>
<td>+ 6</td>
<td>+ 8</td>
</tr>
<tr>
<td>University Of Hawaii/Manoa Valley</td>
<td>+ 7</td>
<td>0</td>
<td>+ 7</td>
</tr>
<tr>
<td>Kaimuki/Kahala/Palolo</td>
<td>+ 5</td>
<td>(- 2)</td>
<td>+ 7</td>
</tr>
<tr>
<td>Iwilei/Kalihi Kai</td>
<td>+ 80</td>
<td>+ 51</td>
<td>+ 29</td>
</tr>
<tr>
<td>Kalihi Valley/Nuuanu Valley</td>
<td>+ 11</td>
<td>+ 4</td>
<td>+ 7</td>
</tr>
<tr>
<td>Airport/Pearl Harbor</td>
<td>0</td>
<td>(- 6)</td>
<td>+ 6</td>
</tr>
<tr>
<td>Salt Lake/Halawa/Moanalua</td>
<td>+ 18</td>
<td>+ 7</td>
<td>+ 11</td>
</tr>
<tr>
<td>Aiea/Pearl City</td>
<td>+ 8</td>
<td>+ 1</td>
<td>+ 7</td>
</tr>
<tr>
<td>Waipahu/Crestview</td>
<td>+ 39</td>
<td>+ 24</td>
<td>+ 15</td>
</tr>
<tr>
<td>Mililani/Wahiawa</td>
<td>+ 20</td>
<td>+ 9</td>
<td>+ 11</td>
</tr>
<tr>
<td>Ewa/Makakilo</td>
<td>+161</td>
<td>+124</td>
<td>+ 37</td>
</tr>
<tr>
<td>Waianae Coast</td>
<td>+ 13</td>
<td>+ 3</td>
<td>+ 10</td>
</tr>
<tr>
<td>North Shore</td>
<td>+ 18</td>
<td>+ 7</td>
<td>+ 11</td>
</tr>
<tr>
<td>Koolauloa</td>
<td>(- 1)</td>
<td>(- 9)</td>
<td>+ 8</td>
</tr>
<tr>
<td>Kaneohe/Waikane</td>
<td>+ 7</td>
<td>(- 3)</td>
<td>+ 10</td>
</tr>
<tr>
<td>Kailua/Waimanalo</td>
<td>+ 5</td>
<td>(- 4)</td>
<td>+ 9</td>
</tr>
<tr>
<td>East Honolulu</td>
<td>+ 1</td>
<td>(- 9)</td>
<td>+ 10</td>
</tr>
</tbody>
</table>

The comparison indicates that the use of households results in more districts having positive growth factors. When households are used, 19 districts have positive growth factors. In contrast, if population is used, only 11 districts have positive growth factors.
Furthermore, the growth factors for only two districts are reduced by the use of households, rather than population. Kakaako experiences a reduction of 42 percent. Still, its household growth factor is a substantial 326 percent. Waikiki experiences a reduction of 9 percent. Curiously, the amended LPA no longer includes a fixed guideway line through Waikiki.

(39) Under the SDEIS, the growth factor for home-based school trip production is based on population change. That growth factor appears to be inappropriate. Instead, school age children should be used.

Data are not available on the number of school age children residing on Oahu. Statewide data, however, are provided in the series M-K projections. The data are as follows:

<table>
<thead>
<tr>
<th></th>
<th>1990</th>
<th>2005</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Resident Population</td>
<td>250,100</td>
<td>268,300</td>
<td>18,200 (7.3%)</td>
</tr>
<tr>
<td>Of 5 To 19 Years Of Age</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The 7.3 percent growth is less than Oahu's islandwide population growth of 11 percent.

(40) Network bus speeds are discussed in section 3.4 on page 36 of the 1992 Patronage Methodology, with further elaboration under section 6.2 on page 91. Section 6.2 reads:

For 2005, bus running times in mixed traffic are expected to further deteriorate, continuing the historical trend. Based upon an analysis of actual operating speeds over a nine-year period, bus travel times were increased an average of 15 percent from the base year values. Speeds on selected arterials in the downtown area (i.e., Hotel, King, Beretania, and Alakea) and around Ala Moana Shopping Center were independently determined based upon the number of buses traversing those links, as the physical constraints on those streets are the determining factor in operating speed characteristics. In contrast, operating speeds on buses utilizing HOV lanes on the H1, H2, and Moanalua Freeways, were increased with the assumption that operating conditions
on those facilities would be improved from actual current experience.

The discussion should be inserted into the final EIS and supplemented by specification of the estimated peak period bus speeds and running times through the Downtown links under each alternative.

(41) Page 34 of the 1992 Patronage Methodology indicates that auto travel time is not considered in the patronage forecasting process.

Consideration of the impact of highway traveltime changes on ridership levels will be addressed in the sensitivity analyses conducted in the last phase of the ridership forecasting process. Specification of changes in roadway service levels cannot be based upon synthetic travel demand model estimates for 2005, as only travel volume estimates are developed on an aggregated screenline basis and therefore, travel time (or speeds) are not available for individual links or on a trip-interchange basis. Therefore, a limited assessment of the impact of the plan on ridership levels may be considered by evaluating the elasticity (or sensitivity) of the patronage projections to likely changes in the roadway travel times.

Transit patronage depends on many factors, one of which is auto travel time. Basically, as auto travel time increases, transit riding becomes more attractive.

The forecasting methodology, as described in the statement, apparently assumes that auto travel time will not increase due to future traffic congestion. In contrast, as indicated under comment 40, the forecasting methodology assumes that future traffic congestion will result in increased bus travel time. Increasing bus travel time, while maintaining auto travel time, produces a bias against transit patronage under the expanded bus alternative. The bias results because the attractiveness of bus transit is reduced by travel time increases, while the attractiveness of auto travel is not. Although feeder buses are utilized under the amended LPA, the bus vehicle miles traveled is much less than under the expanded bus alternative. Consequently, unchanged auto travel time may not negatively impact the fixed guideway's attractiveness to the same degree as bus travel's attractiveness.
An example illustrates the point. Although the example is simplistic and exaggerated, it provides an easier understanding of the bias. Assume the following:

(A) One hundred people live in a community and work at the same place;

(B) Both auto travel time and bus travel time from the community to the work site are 100 minutes;

(C) So long as the travel times are the same, 50 persons will drive an auto to work and 50 persons will ride the bus; and

(D) If the travel time of one mode increases by 10 percent compared to the travel time of the other mode, one person will switch to the faster mode.

Travel time and the mode split in accordance with the assumptions are displayed in the following.

<table>
<thead>
<tr>
<th>Mode</th>
<th>Travel Time</th>
<th>Travelers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bus</td>
<td>100 minutes</td>
<td>50 persons</td>
</tr>
<tr>
<td>Auto</td>
<td>100 minutes</td>
<td>50 persons</td>
</tr>
</tbody>
</table>

If both auto and bus travel times increase by 10 percent to 110 minutes, the mode split would remain the same in accordance with assumption (C). Because auto and bus travel times are the same, bus travelers would remain at 50 and auto travelers also at 50.

If, however, bus travel time increases by 10 percent, but auto travel time does not, one bus rider will switch to auto in accordance with assumption (D). Travel times and the mode split resulting from the change are displayed as follows:

<table>
<thead>
<tr>
<th>Mode</th>
<th>Travel Time</th>
<th>Travelers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bus</td>
<td>110 minutes</td>
<td>49 persons</td>
</tr>
<tr>
<td>Auto</td>
<td>100 minutes</td>
<td>51 persons</td>
</tr>
</tbody>
</table>

(42) Table 3.14 on pages 62 and 63 of the 1992 Patronage Methodology displays the results of the validation of the patronage forecasting model. The table indicates that the patronage forecasting model overestimates total boardings. The following are the differences between the observed boardings and model assigned boardings. For the following data, route 11 is categorized as a suburban trunk route, rather than urban trunk or collector route.

-25-
Results Of Validation
Differences Between
1991 Survey Observed Boardings
And
Model Assigned Boardings

<table>
<thead>
<tr>
<th>Operating Period</th>
<th>Route Category</th>
<th>Observed Boardings</th>
<th>Model Assigned Boardings</th>
<th>% Difference Between Model Assigned And Observed Boardings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Peak Period</td>
<td>Urban Trunk And Collector</td>
<td>101,817</td>
<td>101,560</td>
<td>- 0.3%</td>
</tr>
<tr>
<td></td>
<td>Suburban Trunk</td>
<td>36,448</td>
<td>44,760</td>
<td>+22.8%</td>
</tr>
<tr>
<td></td>
<td>Suburban Feeder</td>
<td>2,908</td>
<td>1,901</td>
<td>-34.6%</td>
</tr>
<tr>
<td></td>
<td>Express</td>
<td>9,857</td>
<td>12,802</td>
<td>+29.9%</td>
</tr>
<tr>
<td>Subtotal Peak Period</td>
<td></td>
<td>151,030</td>
<td>161,023</td>
<td>+ 6.6%</td>
</tr>
<tr>
<td>Off-Peak Period</td>
<td>Urban Trunk And Collector</td>
<td>66,226</td>
<td>64,034</td>
<td>- 3.3%</td>
</tr>
<tr>
<td></td>
<td>Suburban Trunk</td>
<td>21,185</td>
<td>24,459</td>
<td>+15.5%</td>
</tr>
<tr>
<td></td>
<td>Suburban Feeder</td>
<td>1,242</td>
<td>1,569</td>
<td>+26.3%</td>
</tr>
<tr>
<td></td>
<td>Express</td>
<td>0</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Subtotal Off-Peak</td>
<td></td>
<td>88,653</td>
<td>90,062</td>
<td>+ 1.6%</td>
</tr>
<tr>
<td>TOTAL ALL PERIODS</td>
<td></td>
<td>239,683</td>
<td>251,085</td>
<td>+ 4.8%</td>
</tr>
</tbody>
</table>

(A) Based on the validation, the model overestimates total transit patronage by 4.8 percent. Of particular concern is the overestimation for suburban trunk and express routes. The combination of the model's overestimation and high growth factors applied to suburban communities may result in overprojection of transit riders under all alternatives.

(B) No discussion is provided on whether the model was recalibrated as a result of the validation.

It is noted that the visitor trip model appears to have been calibrated to match observed data. Under table 5.11 on page 83 of the 1992 Patronage Methodology, the observed visitor trip attractions amount to 336,072 and the model estimated attractions amount to 336,256. The difference is less than one-tenth of a percent.
With respect to the non-home based model, page 66 of the 1992 Patronage Methodology states:

Therefore, for trip interchanges in the fixed-guideway alternatives where the fixed guideway mode was used, the Non-Home Based trips from the incremental logit [model] will be "replaced" by the estimate derived from application of the Direct Generation model.

For better understanding of the effect of the direct generation model:

(A) The number of non-home based trips under the direct generation model should be specified; and

(B) The number of "replaced" non-home based trips under the incremental logit model should be specified.

The 1989 Service And Patronage Forecasting Methodology, issued with the AA/DEIS, discusses the direct generation model for non-home based trips. On page 3-24, the following statements are made:

Recent experience with new fixed-guideway transit facilities suggests that these facilities can attract substantial numbers of riders making non-home-based trips. Trips during the lunch hour, for example, are an observable mid-day "peak" on many facilities. Ridership on the Washington Metrorail system and on the Denver transit mall, for example, is extremely high during mid-day.

It is reasonable to postulate several characteristics of fixed guideway facilities that encourage trips of this nature. Fixed transit facilities tend to be at least partially separated from auto traffic and provide very frequent service; both their travel speeds and the reliability of these speeds tend to be very high. For trips that are not made on a regular basis, these facilities also tend to be more visible and their use more readily learned. These characteristics are more likely to depend on the physical and operating characteristics of the facility than on its specific technology. A busway with stations that have frequent service, for example, would likely have non-home-based ridership patterns similar to a
fixed guideway line in the same location. Both would carry more non-home-based riders than a commuter rail operation with infrequent service. *(Underscoring added)*

Figure 2.1 of the SDEIS displays an extensive exclusive transit lane network in urban Honolulu. The prominence of the network apparently means that buses will be at least partially separated from auto traffic. Given the network and the statements in the 1989 Patronage Methodology, induced non-home based trips under a direct generation model also should be calculated for the expanded bus alternative.

**Transit Impacts -- 4.1**

(45) By letter, dated March 27, 1992, the Council Chair requested from the Department of Transportation Services copies of the Patronage Results Report and Transportation Impacts Results Report referred to in the SDEIS. By letter, dated April 16, 1992, the Department responded as follows:

The Transportation Impacts Results Report is the proper title of the Patronage Results Report, which is not available at this time. It was anticipated to be completed in January, 1992, but a delay in obtaining the final input data resulted in a delay in producing this document. The report should be available later this month.

As of the date of these comments, the **Results Report** has not been received.

It is difficult to understand how the SDEIS could be published and circulated without complete support data. The Transportation Impacts Results Report is supposed to contain information on transit patronage and traffic impacts. Without the Results Report, the public is unable to adequately comment on the SDEIS.

(46) Trip tables should be included in the final EIS on the work and total transit trips for each alternative and the delta between the amended LPA and expanded bus alternative.

(47) Table 4.1 on page 4-3 displays the bus service characteristics of the existing bus system and the alternatives. The following compares the annual revenue vehicle miles of the
existing bus system, no build alternative, and expanded bus alternative.

Annual Revenue Vehicle Miles
Comparison Of
Existing Bus System In 1991
No Build Alternative In 2005
Expanded Bus Alternative In 2005

<table>
<thead>
<tr>
<th>Alternative</th>
<th>Annual Revenue Vehicle Miles</th>
<th>% Difference From Existing</th>
<th>% Difference From No Build</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing (1991)</td>
<td>15,864,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Build (2005)</td>
<td>17,354,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Expanded Bus (2005)</td>
<td>25,994,000</td>
<td>63.9%</td>
<td>49.8%</td>
</tr>
</tbody>
</table>

Table 4.1 on page 4-11 lists the daily transit trips under the no build alternative and expanded alternative. Table 5 on page 23 of the Survey Report lists the daily transit trips under the existing bus system. The following compares the daily transit trips for the existing bus system, no build alternative, and expanded bus alternative.

Daily Transit Trips
Comparison Of
Existing Bus System In 1991
No Build Alternative In 2005
Expanded Bus Alternative In 2005

<table>
<thead>
<tr>
<th>Alternative</th>
<th>Daily Transit Trips</th>
<th>% Difference From Existing</th>
<th>% Difference From No Build</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing (1991)</td>
<td>206,650</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Build (2005)</td>
<td>245,300</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Expanded Bus (2005)</td>
<td>269,400</td>
<td>30.4%</td>
<td>9.8%</td>
</tr>
</tbody>
</table>

The tables show that:

(A) In comparison to the existing bus system, the expanded bus alternative will operate 63.9 percent more annual revenue vehicle miles. Daily transit trips, however, will increase by only 30.4 percent.

(B) In comparison to the no build alternative, the expanded bus alternative will operate 49.8 percent more annual revenue vehicle miles. Daily transit trips, however, will increase by only 9.8 percent.

Revenue vehicle miles are reflective of the amount of service available to transit users and is independent of bus speed decreases. Logic indicates that there should not be so wide a disparity between revenue vehicle miles and transit patronage.
(48) Notes should be added to table 4.2 on page 4-3 identifying the exact origin and destination locations for each column.

(49) Table 4.2 should be expanded to display the transit travel times from Mililani to Downtown and Windward Oahu to Downtown.

(50) Table 4.3 on page 4-4 shows the transit travel time components from Ewa to Downtown for all alternatives.

(A) The expanded bus alternative has a 5 minute "wait for bus" while the amended LPA has a 2 minute "wait for bus." The reason for the difference should be stated, especially since buses engaged in collecting riders will operate in mixed traffic lanes under all alternatives.

(B) An increase of the bus wait time under the amended LPA to 5 minutes may have a substantial impact on transit patronage. Approximately 50 percent of the fixed guideway riders will arrive at or depart from stations by bus, according to table 4.10 on page 4-12. Even a small increase of out-of-vehicle time, if applied to many transit riders, apparently may reduce patronage substantially. The following statement is made on page 4 of a letter, dated September 21, 1990, from the City Managing Director to the Chair of the HONFED Bank Board:

For example, the inclusion of 0.8 minutes of walk time within rapid transit stations resulted in a decrease in daily transit ridership of approximately 4,000 riders.

Under the forecasting model, out-of-vehicle time has a disutility coefficient twice that for in-vehicle time. Walk time and wait time both are considered out-of-vehicle time. Thus, similar impacts may result by application of a 3 minute increase in bus wait time to 50 percent of the amended LPA's transit riders.

(C) The amended LPA has a 1 minute "walk to destination" after leaving the fixed guideway station. The number of transit riders having destinations within 1 minute walk of fixed guideway stations should be specified to place the table in proper perspective.
(D) The table also should compare the travel time components of the following:

(i) A fixed guideway rider under the amended LPA who must transfer to a shuttle bus to reach a destination; and

(ii) An express bus rider under the expanded bus alternative who need not transfer to reach the same destination.

(51) Table 4.6 on page 4-9 sets forth the transit trips to selected activity centers/districts. Transit trip differences to Downtown and Kakaako between the expanded bus alternative and amended LPA are as follows:

<table>
<thead>
<tr>
<th>Daily Transit Trips To Downtown And Kakaako In 2005</th>
</tr>
</thead>
<tbody>
<tr>
<td>To Downtown</td>
</tr>
<tr>
<td>--------------</td>
</tr>
<tr>
<td>Amended LPA</td>
</tr>
<tr>
<td>Expanded Bus</td>
</tr>
<tr>
<td>Difference</td>
</tr>
</tbody>
</table>

(A) For both alternatives, the transit trips to Downtown and Kakaako should be segregated as follows:

(i) The number of transit trips within Downtown only;

(ii) The number of transit trips within Kakaako only; and

(iii) The number of transit trips between Downtown and Kakaako.

(B) The total number of person trips to Downtown and Kakaako should be provided so mode shares may be determined.

(52) With respect to transit trips from selected low-income areas, one of which is Waianae, page 4-10 states: "The fixed guideway alternative would provide better service to the areas than the TSM Alternative." Table 4.7 on page 4-9, however, sets forth the "Waianae trips" as follows:

(A) Expanded bus alternative -- 9,900; and
(B) Amended LPA -- 9,700.

The data indicate that the fixed guideway does not provide better service to Waianae. Accordingly, the statement should be corrected.

(53) Table 4.8 on page 11 sets forth the transit mode shares among the alternatives as follows.

<table>
<thead>
<tr>
<th>Transit Mode Shares</th>
<th>In 2005</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Transit Trips</td>
</tr>
<tr>
<td>No Build</td>
<td>245,300</td>
</tr>
<tr>
<td>Expanded Bus</td>
<td>269,400</td>
</tr>
<tr>
<td>Amended LPA</td>
<td>315,400</td>
</tr>
</tbody>
</table>

(A) Table 4.8 should include the total person trips upon which the transit mode shares are calculated.

(B) Table 4.8 also should include as a subset for the amended LPA the number and share of fixed guideway trips. "Fixed guideway trips" are considered those transit trips with a link on the fixed guideway. According to page 4-10, fixed guideway trips total 187,400 per day. The fixed guideway mode share is 6.3 percent.

(54) Calculation of the transit mode shares in table 4.8 appears to be based on 2,940,603 resident person trips reported under the Oahu Regional Transportation Plan. Although the base is resident person trips, mode shares are calculated on total transit trips, inclusive of visitor trips. Calculation in that manner results in higher than appropriate mode shares for all alternatives.

Total visitor trips by all modes have not been computed either for the Oahu Regional Transportation Plan or the SDEIS. Thus, avoidance of misrepresentation requires calculation of the mode shares on known data. The following is a computation of the mode shares based on resident person trips and resident transit trips.
Transit Mode Share
Without Visitor Trips
In 2005

Daily Transit Trips w/o Visitor Trips  Daily Resident Person Trips  Transit Mode Share

<table>
<thead>
<tr>
<th></th>
<th>No Build</th>
<th>Expanded Bus</th>
<th>Amended LPA</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>217,600</td>
<td>239,800</td>
<td>281,100</td>
</tr>
<tr>
<td>Daily Resident</td>
<td>2,940,603</td>
<td>2,940,603</td>
<td>2,957,403*</td>
</tr>
<tr>
<td>Person Trips</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transit Mode Share</td>
<td>7.4%</td>
<td>8.2%</td>
<td>9.5%</td>
</tr>
</tbody>
</table>

*Represents daily resident person trips of 2,940,603 plus 16,800 rail induced transit trips, all of which are assumed to be taken by residents.

(55) Page 4-10 discusses peak period trips for the no build alternative. No discussion, however, is provided on peak period trips for the other alternatives. A table should be provided on peak, base, and off peak period transit trips for all alternatives. The table should also include total person trips during the peak, base, and off peak periods so mode shares can be determined.

(56) Table 4.9 on page 4-11 sets forth the transit trips by purpose as follows.

Daily Transit Trips By Purpose
In 2005

<table>
<thead>
<tr>
<th></th>
<th>Home-Based Work</th>
<th>Home-Based Nonwork</th>
<th>Non-Home-Based</th>
<th>Visitor</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amended LPA</td>
<td>123,600</td>
<td>108,300</td>
<td>49,200</td>
<td>34,300</td>
<td>315,400</td>
</tr>
<tr>
<td>Expanded Bus</td>
<td>107,000</td>
<td>103,400</td>
<td>29,400</td>
<td>29,600</td>
<td>269,400</td>
</tr>
<tr>
<td>Difference</td>
<td>16,600</td>
<td>4,900</td>
<td>19,800</td>
<td>4,700</td>
<td>46,000</td>
</tr>
<tr>
<td>% Difference</td>
<td>36.1%</td>
<td>10.7%</td>
<td>43.0%</td>
<td>10.2%</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

The table shows that non-home-based trips under the amended LPA account for the largest difference from the expanded bus alternative.

(A) The discussion of trips by purpose should specify that non-home-based trips account for the largest difference between the amended LPA and expanded bus alternative. The discussion is important because it suggests that the amended LPA's major benefit results from non-home-based trips, rather than home-based work trips by commuters.
(B) The total number of person trips for each purpose should be provided so mode shares may be determined.

(57) The following table presents the differences between the amended LPA and expanded bus alternative for:

(A) Total transit trips from major suburban origin districts; and

(B) Transit trips to Downtown and Kakaako from the major suburban origin districts.

The transit trip data in the following table and the table under comment (58) are not based on the patronage forecast for the SDEIS. Although requested, trip tables for the SDEIS forecast were not provided to the Council. Because of the lack of current data, the trip tables submitted during Council deliberation on the development agreement ordinance are used. Those trip tables were submitted through Communication D-1077, dated November 21, 1991.

Populations of the origin districts also are provided for scale. In general, most of the trips from origin districts represent round trips by residents of those districts. A round trip by a resident from an origin district to another and back is counted as two trips from that origin district. Thus, to gain an idea of the number of district residents who will benefit from the amended LPA in comparison to the expanded bus alternative, the trip differences in the following tables should be divided by two.

**Differences In Daily Transit Trips Between Amended LPA And Expanded Bus Alternative For Major Suburban Origin Districts In 2005**

<table>
<thead>
<tr>
<th>Origin District</th>
<th>Total Trips</th>
<th>Trips To</th>
<th>Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Waipahu/Crestview</td>
<td>+ 694</td>
<td>+ 299</td>
<td>64,867</td>
</tr>
<tr>
<td>Mililani/Wahiawa</td>
<td>+ 260</td>
<td>- 37</td>
<td>85,999</td>
</tr>
<tr>
<td>Ewa/Makakilo</td>
<td>+1,462</td>
<td>+ 48</td>
<td>94,223</td>
</tr>
<tr>
<td>Kaneohe/Waikane</td>
<td>- 177</td>
<td>+ 53</td>
<td>65,024</td>
</tr>
<tr>
<td>Kailua/Waimanalo</td>
<td>- 280</td>
<td>+ 45</td>
<td>48,712</td>
</tr>
<tr>
<td>East Honolulu</td>
<td>+ 150</td>
<td>- 232</td>
<td>41,754</td>
</tr>
</tbody>
</table>

With respect to total transit trips, the amended LPA produces more trips from Waipahu/Crestview, Mililani/Wahiawa,
Ewa/Makakilo, and East Honolulu. For Windward Oahu districts, the amended LPA produces less total transit trips than the expanded bus alternative.

With respect to transit trips to Downtown/Kakaako, the differences are much less. The amended LPA produces less or only slightly more transit trips to Downtown/Kakaako for 5 of the 6 districts. Only for trips from Waipahu/Crestview may the difference be described as sizeable in absolute terms. Relative to population, however, the difference is fairly insubstantial.

(58) The following table presents the differences in transit trips from urban districts not encompassing or adjacent to the amended LPA.

<table>
<thead>
<tr>
<th>Origin District</th>
<th>Total Trips</th>
<th>Trips To Downtown/Kakaako</th>
<th>Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Beretania/Sheridan</td>
<td>+522</td>
<td>+ 13</td>
<td>25,603</td>
</tr>
<tr>
<td>Makiki/Makiki Heights</td>
<td>-175</td>
<td>+ 7</td>
<td>37,016</td>
</tr>
<tr>
<td>Kaimuki/Kahala/Palolo</td>
<td>+388</td>
<td>+290</td>
<td>53,932</td>
</tr>
<tr>
<td>Kalihi Valley/Nuuanu Valley</td>
<td>-195</td>
<td>-100</td>
<td>72,997</td>
</tr>
</tbody>
</table>

With respect to total transit trips, the amended LPA produces more trips from Beretania/Sheridan and Kaimuki/Kahala/Palolo. For Makiki/Makiki Heights and Kalihi Valley/Nuuanu Valley, the amended LPA produces less total transit trips than the expanded bus alternative.

With respect to transit trips to Downtown/Kakaako, the amended LPA produces less or only slightly more transit trips for 3 of the 4 districts. Only for trips from Kaimuki/Kahala/Palolo may the difference be described as sizeable. Relative to population, however, the difference is fairly insubstantial.

(59) Page 4-10 states:

The large increase in non-home-based trips reflects the attractiveness of fixed guideway transit, with easily identifiable station
locations and frequent and reliable schedules

(A) The number of non-home-based trips with a link on the fixed guideway should be provided.

(B) A trip table of the non-home-based trips should be provided so the areas directly benefiting from "transit mobility" may be identified.

(60) Page 4-10 includes the following statement:

The volumes shown include arrival at the origin station and departure from the destination, so each trip is represented twice; thus total trips on the fixed guideway system would be about 187,400 per day.

(A) An explicit statement should be added that the fixed guideway will serve only 59.4 percent of the total daily transit trips. The other 60.6 percent will be transit trips only on the bus.

(B) In the "Price And Financial Evaluation Of Proposals," supplemental information, dated November 1991, presented during Council deliberation on the development agreement ordinance, the total transit trips for the amended LPA is 280,500. Of the total, 140,200 or approximately 50 percent are identified as fixed guideway trips. An explanation should be provided for the difference between the fixed guideway's 59.4 percent share in the SDEIS and 50 percent share in the supplemental information.

(61) Page 4-14 includes the following statement:

The Kaahui Station to Nimitz/Smith Station link would carry the highest one-direction peak-hour ridership. Ridership along this segment is forecast to be 8,550 for the amended LPA with a corresponding two-way peak-hour volume of 11,820.

The 8,550 pphpd is higher than the initial capacity of 7,500 pphpd. Discussion should be included on whether the higher volume requires exercise of the vehicle purchase option under the system contract.
(62) Page 20 of the UH Evaluation states the following:

The industry standard for minimum line-haul ridership is at least 12,000 one-way hourly passengers during the peak hour at maximum load point to justify a ten-mile to fifteen-mile, fixed guideway rail investment.

For the 16-mile amended LPA, the highest volume is 8,550 pphpd at maximum load point. Based on the "industry standard," as specified in the UH Evaluation, the amended LPA may not be justified.

(63) Page 4-15 includes the following statement:

The other 16,800 new transit trips on the amended LPA would be either trips not otherwise made, or trips diverted from walking.

During Council deliberations on the development agreement ordinance, two trips tables for the amended LPA were submitted by the City administration. One, attached to communication D-1077, dated November 12, 1991, sets forth a total of 280,968 transit trips, inclusive of "rail induced non-home based" trips. The other, attached to communication D-1049, dated November 7, 1991, sets forth a total of 255,768 transit trips, excluding "rail induced non-home based" trips. The difference, which represents "rail induced non-home based" trips, is 25,200.

An explanation should be provided for the difference between the 25,200 "rail induced non-home based" trips calculated from the trips tables and the 16,800 "new transit trips" discussed in the SDEIS.

(64) Section 4.1.3 discusses farebox revenues. Based on the transit patronage and inflation assumptions, the adult and student single cash fares and monthly bus pass fares in 2005 should be specified.

Highway And Parking Impacts -- 4.2

(65) Section 4.2 commencing on page 4-14 discusses highway and parking impacts. Since all residents of Honolulu will be subject to the surcharge to fund the fixed guideway and since proponents contend that traffic will be reduced, more data on islandwide traffic impacts should be included.
In a manner similar to table 4.2 on page 4-3, auto travel
times under the no build alternative, expanded bus alternative,
and amended LPA should be provided for the following trips during
the morning peak period in 2005:

(A) Ewa (Kapolei) to Downtown;
(B) Waikiki to Downtown;
(C) Pearl City to Downtown;
(D) Ewa (Kapolei) to Waikiki;
(E) Pearl City to Ala Moana Center;
(F) Hawaii Kai to Downtown;
(G) Mililani to Downtown; and
(H) Windward Oahu to Downtown.

(66) Traffic volume data and volume to capacity ratios
across all screenlines in the Oahu Regional Transportation Plan
also should be presented for the amended LPA and expanded bus
alternative.

(67) Page 4-14 includes the following statement:

The 24,100 additional transit trips on the
TSM Alternative, compared to the No-Build,
would result in a reduction of auto vehicle
trips by 17,200 per day. Of the 70,100
additional transit trips on the amended LPA,
compared to the No-Build, 53,000 would
represent trips diverted from auto, resulting
in reduction of vehicle trips by 38,100 per
day.

The discussion should also state that the amended LPA
reduces vehicle trips by only 1.1 percent compared to the
expanded bus alternative. Furthermore, the discussion should
state that the amended LPA reduces vehicle trips by only 2.0
percent compared to the no build alternative. The following
tables calculates the vehicle trip difference among the
alternatives.
Daily Auto Trips Calculation
In 2005

<table>
<thead>
<tr>
<th></th>
<th>Person Trips</th>
<th>Average Auto Occupancy</th>
<th>Auto Trips</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Diverted From Auto</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Build</td>
<td>2,940,603</td>
<td>245,300</td>
<td>1.4</td>
</tr>
<tr>
<td>Expanded Bus</td>
<td>2,940,603</td>
<td>269,400</td>
<td>1.4</td>
</tr>
<tr>
<td>Amended LPA</td>
<td>2,940,603</td>
<td>298,600*</td>
<td>1.4</td>
</tr>
</tbody>
</table>

*Calculated as follows:
315,400 (Total Transit Trips)
- 16,800 (Rail Induced Trips)

298,600 (Transit Trips Diverted From Auto)

Daily Auto Trips Differences
In 2005

<table>
<thead>
<tr>
<th></th>
<th>Auto Trips</th>
<th>% Difference From No Build</th>
<th>% Difference From Expanded Bus</th>
</tr>
</thead>
<tbody>
<tr>
<td>No Build</td>
<td>1,925,216</td>
<td>---------</td>
<td></td>
</tr>
<tr>
<td>Expanded Bus</td>
<td>1,908,002</td>
<td>-17,214 (-0.9%)</td>
<td>-20,857 (-1.1%)</td>
</tr>
<tr>
<td>Amended LPA</td>
<td>1,887,145</td>
<td>-38,071 (-2.0%)</td>
<td></td>
</tr>
</tbody>
</table>

It is emphasized that the auto trip reductions are based on resident person trips and total transit trips, inclusive of visitor transit trips. When auto trips for residents are calculated after eliminating visitor transit trips:

(A) In comparison to the no build alternative, the amended LPA results in an auto trip reduction for residents of 1.7 percent; and

(B) In comparison to the expanded bus alternative, the amended LPA results in an auto trip reduction for residents of 0.9 percent.

(68) Page 4-15 includes the following statements:

This reduction could amount to decreases in traffic on the order of 5% at key locations as compared to the TSM Alternative. Impacts during peak hour would likely be more significant.
The statements are unsupported by data. The relevant data should be included in the final EIS. If the data are not included, the statements should be deleted.

(69) Table 4.13 on page 4-15 sets forth the change in annual vehicle miles traveled for the expanded bus alternative and amended LPA. The method of calculation should be described.

(70) Table 4.14 on page 4-16 summarizes the traffic impacts at certain intersections near rail stations. Traffic impacts should be included for intersections near the Downtown and Kakaako stations of the amended LPA.

Expanded Bus Alternative Treatment Under SDEIS And AA/DEIS

Data in the AA/DEIS clearly showed that the fixed guideway alternative would not produce substantially greater transit ridership and traffic reduction benefits than the expanded bus alternative. That conclusion remains evident, notwithstanding harsher treatment of the expanded bus alternative under the SDEIS.

The following comments illustrate the harsher treatment of the expanded bus alternative. The comments are primarily based on comparison of data in the SDEIS against data in AA/DEIS for the no build alternative, expanded bus alternative, and amended LPA/alternative 8. The amended LPA and alternative 8 have basically the same fixed guideway alignment, with one exception. The amended LPA lacks the Waikiki line of alternative 8.

(71) The following table compares the differences between the no build alternative and expanded bus alternative in annual revenue vehicle miles and daily transit trips reported in the AA/DEIS.
Annual Revenue Vehicle Miles And Daily Transit Trips Differences Between No Build Alternative And Expanded Bus Alternative In AA/DEIS In 2005

<table>
<thead>
<tr>
<th>Alternative</th>
<th>Annual Revenue Vehicle Miles</th>
<th>% Diff From No Build</th>
<th>Daily Transit Trips</th>
<th>% Diff From No Build</th>
</tr>
</thead>
<tbody>
<tr>
<td>No Build</td>
<td>18,685,000</td>
<td>------</td>
<td>192,600</td>
<td>------</td>
</tr>
<tr>
<td>Expanded Bus</td>
<td>25,295,000</td>
<td>35.4%</td>
<td>229,600</td>
<td>19.2%</td>
</tr>
</tbody>
</table>

The disparity in annual revenue vehicle miles and daily transit trips under the AA/DEIS is much less than the differences in the SDEIS, as displayed under comment (47). The following table compares the differences between the AA/DEIS and SDEIS.

Percent Difference Between Expanded Bus Alternative And No Build Alternative In Annual Revenue Vehicle Miles And Daily Transit Trips Under AA/DEIS And SDEIS In 2005

<table>
<thead>
<tr>
<th>% Difference Between Expanded Bus Alt. And No Build Alt. In Annual Revenue Vehicle Miles</th>
<th>% Difference Between Expanded Bus Alt. And No Build Alt. In Daily Transit Trips</th>
</tr>
</thead>
<tbody>
<tr>
<td>AA/DEIS 35.4%</td>
<td>SDEIS 49.8%</td>
</tr>
<tr>
<td></td>
<td>AA/DEIS 19.2%</td>
</tr>
<tr>
<td></td>
<td>SDEIS 9.8%</td>
</tr>
</tbody>
</table>

(72) Table 4.1 on page 4-3 of the SDEIS and table 4.1 on page 4-2 of the AA/DEIS list the number of buses in peak service for the expanded bus alternative. In the SDEIS, the number of buses totals 803. In the AA/DEIS, the number totals 831, more than that in the SDEIS.

(73) Table 4.6 on page 4-9 of the SDEIS and table 4.6 of the AA/DEIS set forth the transit trips to Downtown, Kakaako, and Ala Moana Center for the alternatives. The following table displays the differences between the SDEIS and AA/DEIS for the no build alternative, expanded bus alternative, and amended LPA/alternative 8. The comparison shows that the expanded bus alternative has the least absolute and percentage increases for trips to Downtown and Kakaako. The comparison also shows that the expanded bus alternative has the largest absolute and percentage decreases of trips to Ala Moana Center.
Daily Trips To Selected Activity Centers/Districts
Comparison Of Trips In SDEIS And AA/DEIS
In 2005

<table>
<thead>
<tr>
<th></th>
<th>SDEIS</th>
<th>AA/DEIS</th>
<th>Difference</th>
<th>Percent Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>To Downtown</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Build</td>
<td>61,500</td>
<td>32,600</td>
<td>+28,900</td>
<td>+88.7%</td>
</tr>
<tr>
<td>Expanded Bus</td>
<td>64,300</td>
<td>40,800</td>
<td>+23,500</td>
<td>+57.6%</td>
</tr>
<tr>
<td>Amended LPA/Alt. 8</td>
<td>74,500</td>
<td>42,900</td>
<td>+31,600</td>
<td>+73.7%</td>
</tr>
<tr>
<td>To Kakaako</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Build</td>
<td>32,200</td>
<td>22,900</td>
<td>+9,300</td>
<td>+40.6%</td>
</tr>
<tr>
<td>Expanded Bus</td>
<td>33,300</td>
<td>27,900</td>
<td>+5,400</td>
<td>+19.4%</td>
</tr>
<tr>
<td>Amended LPA/Alt. 8</td>
<td>42,700</td>
<td>32,400</td>
<td>+10,300</td>
<td>+31.8%</td>
</tr>
</tbody>
</table>

(74) Table 4.9 on page 4-11 of the SDEIS and table 4.9 of the AA/DEIS set forth the home-based work trips among the alternatives. The following table displays the differences between the SDEIS and AA/DEIS for the no build alternative, expanded bus alternative, and amended LPA/alternative 8. The comparison shows that the expanded bus alternative has the least absolute and percentage increases of home-based work trips.

Daily Home-Based Work Transit Trips
In 2005

<table>
<thead>
<tr>
<th></th>
<th>SDEIS</th>
<th>AA/DEIS</th>
<th>Difference</th>
<th>Percent Increase</th>
</tr>
</thead>
<tbody>
<tr>
<td>No Build</td>
<td>94,500</td>
<td>84,300</td>
<td>10,200</td>
<td>12.1%</td>
</tr>
<tr>
<td>Expanded Bus</td>
<td>107,000</td>
<td>106,500</td>
<td>500</td>
<td>0.5%</td>
</tr>
<tr>
<td>Amended LPA/Alt. 8</td>
<td>123,600</td>
<td>115,200</td>
<td>8,400</td>
<td>7.3%</td>
</tr>
</tbody>
</table>

(75) Table 4.9 on page 4-11 of the SDEIS and table 4.9 of the AA/DEIS set forth the nonwork, nonvisitor trips among the alternatives. The following table displays the differences between the SDEIS and AA/DEIS for the no build alternative,
expanded bus alternative, and amended LPA/alternative 8. The comparison shows that the expanded bus alternative has the least absolute and percentage increases of nonwork, nonvisitor trips.

### Daily Nonwork, Nonvisitor Trips

<table>
<thead>
<tr>
<th></th>
<th>SDEIS</th>
<th>AA/DEIS</th>
<th>Difference</th>
<th>Percent Increase</th>
</tr>
</thead>
<tbody>
<tr>
<td>No Build</td>
<td>123,100</td>
<td>82,400</td>
<td>40,700</td>
<td>49.4%</td>
</tr>
<tr>
<td>Expanded Bus</td>
<td>132,800</td>
<td>95,000</td>
<td>37,800</td>
<td>39.8%</td>
</tr>
<tr>
<td>Amended LPA/Alt. 8</td>
<td>157,500</td>
<td>105,700</td>
<td>48,800</td>
<td>44.9%</td>
</tr>
</tbody>
</table>

### ENVIRONMENTAL CONSEQUENCES -- 5.0

### Land Use And Economic Development -- 5.1

(76) With respect to regional land use impacts, section 5.1.1 on page 5-1 states:

The City and County of Honolulu is characterized by a strong economy, a well-established set of land use policies and controls, a low unemployment rate, and a positive development climate. As an already highly urbanized area, the region in which the study corridor falls has market characteristics and is developed to such an extent that land use impacts from the amended LPA would be unlikely to result in changes in the amount of or overall trend of existing or planned development in the region. Case studies in other urban areas have found that fixed guideway transit facilities produce no net change in growth and development at the regional level. (Underscoring added)

Certain proponents of the fixed guideway contend that the system will prevent "urban sprawl." That contention is not supported by the statement. Thus, section 5.1.1 should include an explicit statement that the fixed guideway will not prevent urban sprawl.

(77) With respect to corridor level land use and development, section 5.1.2.2 on page 5-2 states:

Although transit mobility and travel times would improve, the impact of either the TSM
Alternative or the amended LPA on land use at the corridor level would be to focus and reinforce existing land use and development trends rather than promote new development or produce substantial land use changes. The location and rate of development and/or redevelopment within the study corridor is a function of the existing strong economy, market forces, and local planning policies and practices; these factors are and would remain, independent of the TSM Alternative or the amended LPA.

The impact of these alternatives on corridor-level land use would be limited to a redistribution of development to focus on corridors where accessibility is increased and to station areas where land use controls, land use trends, and patterns of land ownership are conducive to development or redevelopment. (Underscoring added)

The statements are further supported on page 5-18:

Much of the development and redevelopment that is anticipated within the corridor, particularly in the station areas, would occur regardless of whether the system is in place or not. (Underscoring added)

Certain proponents of the fixed guideway contend that the system will induce additional development in urban Honolulu. That contention, however, is not supported by the statement. Thus, an explicit statement should be included that the fixed guideway will not induce additional development in urban Honolulu.

(78) Section 5.1.3 commencing on page 5-6, concerning station area impacts, includes the following paragraph:

The most influential component of the fixed guideway system would be the station areas, because stations become the focus of transit patron activity and tend to focus development activity. The impact that stations have on the existing land use characteristics of adjacent areas is partly dependent on market forces currently operating within the area and the land use controls in place to guide development and redevelopment. The transit stations would not foster new markets but
would serve as catalysts and focal points for development. (Underscoring added)

Certain proponents contend that fixed guideway stations will promote new development. The paragraph refutes that contention, and an express statement should be included stating so.

(79) Section 5.1.2.5 on page 5-4, concerning socioeconomic trends and distribution, states:

The proposed TSM Alternative or amended LPA would produce no substantive impact on the distribution or trends related to population, employment, housing, or income characteristics of the Honolulu area or within the study corridor. (Underscoring added)

Certain proponents of the fixed guideway contend that the system will have a beneficial impact on socioeconomic trends and distribution. The statement clearly refutes that contention.

(80) Page 5-3 includes the following paragraph:

Although definitive predictions are not possible at the present level of planning, one way the amended LPA could foster new development or redevelopment is under circumstances where the purchase of land required for the guideway removes one or more of the existing constraints to development. One area where this potential is high is in Kakaako along Waimanu and Kona Streets where acquisition of some existing small businesses would be required. Land not required for the fixed guideway and stations would be sold or leased at the current market values and thus available for development, which would lessen the existing constraint of small parcels with numerous owners. (Underscoring added)

The legal and ethical propriety should be addressed of:

(A) Acquiring by condemnation more land than necessary for public transit use; and

(B) Then reselling the excess for private development.
(81) Section 5.1.5 commencing on page 5-18 discusses economic impacts. The section does not include any discussion of the impact of the county general excise and use tax surcharge on businesses, especially small businesses. That omission is a significant deficiency and must be corrected.

(82) Page 5-18 includes the following statements:

Construction expenditures derived from local sources, such as through an excise tax on local residents and businesses, represent a redirection of consumer spending rather than additional moneys in the local economy. Thus, there may be a reduction in jobs from other sectors of the economy due to construction of the rapid transit system. (Underlining added)

The discussion should identify the jobs which may be lost due to the "redirection."

(83) Page 5-19 discusses the economic benefits from direct, indirect, and induced expenditures during the construction phase of the fixed guideway. The discussion appears to be based on application of the standard multiplier for construction activities. Whether based on the standard multiplier or not, the economic benefits from the fixed guideway construction should be compared with the benefits from expenditure of $1.3 billion (in year-of-expenditure dollars) for rental housing construction or school repair.

Displacements And Relocations -- 5.2

(84) Section 5.2.1 commencing on page 5-20 includes a discussion of the arrangement for acquisition of the Navy Drum Storage Site at Waiau. The discussion states:

The amended LPA would require the acquisition of the Navy Ewa Drum Storage Site from the Navy to accommodate the Waiau Station, maintenance facility, and park-and-ride lot. The 43.8 acre Ewa Drum Storage Site is currently owned by the United States Navy. The property is proposed to be conveyed to the City and County of Honolulu (City) in exchange for 28.3 acres of City property on the Waiau Peninsula. This transfer has been authorized by Section 2840 of the National

Although the site is no longer used as a sewage treatment plant (STP), tanks and other structures remain on the property. The federal legislation requires the city to study both the STP site and the Ewa Drum Storage Site to ascertain the presence of hazardous substances. If such substances are found, the Navy will be responsible for the cost of cleaning up the Ewa Drum Storage Site and the City will be responsible for the STP site.

Additionally, the City is required by the legislation to pay for the cost of the demolition and removal of the STP facilities and for the cost of road access improvements to the site, including a new bridge across the Waiawa Stream. The City also must pay the U.S. Navy the difference in any excess value of the Ewa Drum Storage Site as compared to the STP site with the required improvements. The City and the U.S. Navy are negotiating a formal Memorandum of Agreement regarding the property transfer. A separate NEPA document would be prepared addressing the environmental impacts of the land swap, including the demolition of existing structures on the STP site and roadway/bridge construction.

The discussion also should address the following:

(A) The estimated payment by the City for the demolition and removal of facilities from the STP site;

(B) The estimated payment by the City for the construction of road access improvements and the Waiawa Stream bridge;

(C) The estimated fair market value of the STP site after demolition and removal of facilities and completion of the road access improvements and Waiawa Stream bridge;

(D) If required, the estimated cost to the City of removal and treatment of hazardous waste from the STP site;

(E) The estimated excess value of the Drum Storage site in comparison to the sum of the value of the STP site and payments for demolition, removal, and improvements;
(F) The party liable for removal and treatment of hazardous waste from the Drum Storage site if discovered after transfer from the Navy to the City; and

(G) Whether the full cost to the City incurred by the transfer is included as "other project costs" in the amended LPA's capital financial plan set forth in table 6.5 on pages 6-8 and 6-9.

(85) With respect to the University/Quarry area, page 5-22, states:

The guideway through the University/Quarry area would be adjacent to Lower Campus Road within the university's boundaries. Several portable university buildings would be relocated to accommodate the fixed guideway and University/Quarry Station. These would include the ROEC classrooms and several administrative buildings. It is anticipated that the Pathology and Audiology building would be relocated by the University for construction of the proposed arena.

The discussion also should specify the following:

(A) The cost of the relocation;

(B) Whether the State or City will be responsible for the relocation cost; and

(C) If the City is to be responsible, whether the relocation cost is included as "other project costs" in the amended LPA's capital financial plan set forth in table 6.5 on pages 6-8 and 6-9.

Pedestrian And Bicycle Travel -- 5.3.2

(86) Page 5-24 includes the following paragraph:

The fixed guideway would produce no impact on established bike lanes or trails. All existing facilities would be maintained. Reduction of lane widths associated with expansion of medians to accommodate the guideway and stations may increase competition for roadway lanes on Dillingham Boulevard and University Avenue. The bike
The first and second sentences are contradicted by the remainder of the paragraph.

Visual And Aesthetic Resources -- 5.4

(87) Section 5.4 commencing on page 5-26, concerning visual and aesthetic resources, should address near and far view impacts, with emphasis on mauka to makai views. More renderings also are necessary, especially of the fixed guideway where flying over freeway interchanges.

Air Quality -- 5.5

(88) With respect to mesoscale analysis of air quality impact, section 5.5.1 commencing on page 5-31 states:

The fixed guideway alternative would result in a slight (1 to 3%) reduction in emissions over the 10-year period, when compared with the No-Build Alternative. The TSM Alternative would result in negligible differences compared to the No-Build Alternative for most pollutants by the year 2005 and a 2.5% increase in sulfur oxide emissions.

Microscale analysis in section 5.5.2 commencing on page 5-32 also indicates that the amended LPA will not produce substantial air quality benefits when compared to the no build and expanded bus alternatives.

Certain proponents contend that the amended LPA will produce substantial air quality benefits. That contention is not supported by the statement. Thus, an explicit statement should be included that the amended LPA will not result in substantial air quality benefits.

Road Traffic Noise Impact -- 5.6.5

(89) Page 5-40, with respect to road traffic noise impact, states the following:
Because there is only a slight difference in traffic volumes among the No-Build, TSM, amended LPA, and the AA/DEIS Alternative B, the traffic noise impact during the year 2005 for all alternatives is expected to be similar....

The traffic noise impact analysis indicates that, in the year 2005, the differences in traffic volumes and the noise environment for the No-Build, TSM, and the amended LPA, with or without the Halekauwila Option would be insignificant. (Underscoring added)

The portions of the statements on traffic volumes should be included in section 4.2.1, concerning highway congestion impacts.

Energy -- 5.9

(90) Section 5.9 commencing on page 5-54 discusses the energy impacts of the alternatives. Reference is made to the diesel fuel requirements for the expanded bus alternative. No data, however, are provided on the amount of diesel fuel required for that alternative or the others.

(91) With respect to auto gasoline consumption impact, page 5-55 states:

Automobile gasoline consumption for the amended LPA and TSM Alternative would decrease by minor amounts (1 to 2%) relative to the No-Build Alternative due to the diversion of former automobile drivers to transit.

An explicit statement should be added that the auto consumption difference between the amended LPA and expanded bus alternative also are "minor." Certain proponents contend that the amended LPA will result in substantial gasoline conservation. That contention is not supported by the statement.

(92) Page 5-55 includes the following statement:

Construction of the rail transit system would require energy. Energy is consumed in operating equipment at the construction site, in producing and transporting construction
materials, and in manufacturing vehicles and other equipment.

Data are not provided on the amount of energy required to construct the system. The EH Evaluation implies that energy consumption during construction of a fixed guideway, even without a tunnel, may be substantial.

Historic And Archaeological Resources -- 5.10

(93) Figures 5.4.2 and 5.4.3 on pages 5-73 and 5-74 show views of the Dillingham Transportation Building with and without the fixed guideway. The titles of the figures should be reversed.

Hazardous Wastes -- 5.13.6

(94) Section 5.13.6 commencing on page 5-92 discusses hazardous wastes only cursorily. Experience with the Alapai Police Building indicates that hazardous waste removal and treatment can substantially increase the cost of a project. The narrative indicates that additional hazardous waste studies would be conducted "during later design phases," which apparently will follow the Council's approval of the full funding agreement. Hazardous waste information, however, should be available prior to the Council's final approval of the project.

CHAPTER 6 -- FINANCIAL AND COST-EFFECTIVENESS ANALYSIS

Financial Analysis -- 6.1

(95) Page 6-1 states: "Other cost items are assumed to follow a 5% rate of inflation." Schedule B of the development agreement and table 6.5 are based on a four percent inflation rate. The discrepancy should be clarified.

(96) Page 6-2, with respect to the $618 million in section 3 funds for the Honolulu project, states: "The federal participation is also subject to an annual appropriation by the Congress." A discussion should be provided on the following:

(A) The type, extent, and enforceability of any guaranty concerning the section 3 funds which will part of the
full funding agreement with the Federal Transit Administration;

(B) The Federal Transit Administration's liability to the City should Congress fail to appropriate the funds; and

(C) The City's liability to the system contractor should Congress fail to appropriate the funds.

(97) Section 3035(ww) of the ISTEA states:

Honolulu Rapid Transit Project — No later than April 30, 1992, the [U.S. Secretary of Transportation] shall negotiate and sign a multiyear grant agreement with the City and County of Honolulu which includes $618,000,000 from funds made available under section 3(k)(1)(B) of the Federal Transit Act to carry out the construction of the locally preferred alternative of a 17.3 mile fixed guideway system.

(A) No "multiyear grant agreement" between the U.S. Secretary of Transportation and City and County of Honolulu was entered into by April 30, 1992. A discussion should be included on the ramifications of the absence of the agreement.

(B) The amended LPA is 16.0 miles. A discussion should be included on whether the ISTEA permits a fixed guideway of less than 17.3 miles.

(98) Discussion is not provided on benefit assessment districts to fund either capital cost or operating and maintenance cost. The City administration's position should be specified on benefit assessment districts as a funding source for the fixed guideway's capital cost or operating and maintenance cost.

(99) Discussion is not provided on vehicle registration fee or fuel tax increases to fund either the capital cost or operating and maintenance cost. The City administration's position should be specified on increasing vehicle registration fees and fuel taxes to fund the fixed guideway's capital cost or operating and maintenance cost.
Projected Capital Expenditures -- 6.1

(100) Page 6-4 indicates that the system contractor's fixed price is "only subject to an inflation adjustment based on already defined indices." That is an incorrect statement, since the price is adjustable for change orders.

(101) Table 6.1 on page 6-5 sets forth the capital cost of the amended LPA. A note should explicitly specify the amount of interest on bonds, the proceeds of which will be used to fund the capital cost.

(102) Table 6.3 on page 6-6 presents the capital costs of all alternatives in 1991 dollars. Table 6.4 on page 6-6 presents the operating and maintenance costs of all alternatives in 1991 dollars. The capital costs and operating and maintenance costs of all alternatives should also be presented in year-of-expenditure dollars.

Financial Plan -- 6.1.5

(103) Section 6.1.5.1 on page 6-7 describes the rapid transit capital financial plan. On March 16, 1992, the State Council on Revenues lowered its projections of statewide general excise and use tax revenues. The section should be rewritten to reflect the Council on Revenues' latest projections, as well as the State's actual general excise and use tax receipts in the fiscal year 1991-92.

(104) Table 6.5 on pages 6-8 and 6-9 is basically schedule B attached to the development agreement. The following compares, for the fiscal period 1990 to 1998, the surcharge growth rates in Schedule B and the statewide general excise and use tax revenue growth rates projected by the Council on Revenues on March 16, 1992.
## Comparison Of Growth Rates
Surcharge Revenues In Schedule B
And
Statewide General Excise And Use Tax Revenues
In March 16, 1992 Projections By Council On Revenues

<table>
<thead>
<tr>
<th></th>
<th>City Admin. Projections Of County General Excise And Use Tax Surcharge Revenues Based On Schedule B</th>
<th>Council On Revenues Projections Of Statewide General Excise And Use Tax Revenues Based On March 16, 1992 Report</th>
</tr>
</thead>
<tbody>
<tr>
<td>FY 90-91 to FY 92-93</td>
<td>13.94%</td>
<td>-----</td>
</tr>
<tr>
<td>FY 90-91 to FY 91-92</td>
<td>------</td>
<td>(-0.10%)</td>
</tr>
<tr>
<td>FY 91-92 to FY 92-93</td>
<td>------</td>
<td>0.23%</td>
</tr>
<tr>
<td>FY 92-93 to FY 93-94</td>
<td>6.50%</td>
<td>2.82%</td>
</tr>
<tr>
<td>FY 93-94 to FY 94-95</td>
<td>7.00%</td>
<td>4.52%</td>
</tr>
<tr>
<td>FY 94-95 to FY 95-96</td>
<td>7.00%</td>
<td>6.79%</td>
</tr>
<tr>
<td>FY 95-96 to FY 96-97</td>
<td>7.00%</td>
<td>8.65%</td>
</tr>
<tr>
<td>FY 96-97 to FY 97-98</td>
<td>7.00%</td>
<td>7.93%</td>
</tr>
</tbody>
</table>

The capital financial plan for the amended LPA should be consistent with the Council on Revenues' projections.

(105) On March 19, 1992, the Department of Transportation Services was requested by the Council Chair to submit a revised Schedule B, as follows:

Please provide a revised Schedule B for the rapid transit project based on the following assumptions. Schedule B refers to the "Rapid Transit Capital Financial Plan" attached to the development agreement between the City and State.

The revision is to use the same assumptions in the approved Schedule B concerning economic price adjustment rate, cost escalation rate, interest income rate, and bond interest rate and maturity date. County general excise and use tax revenues, however, are to be determined on the following assumptions:

(1) Between the fiscal year 1990-91 and fiscal year 1997-98, assume that surcharge revenues will be based on the same annual percentage changes as the [sic] those projected by the Council on
Revenues for statewide general excise
and use tax revenues. The Council on
Revenues' latest projection, dated March
16, 1992, is attached; and

(2) Between the fiscal year 1997-98 and
fiscal year 2002-03, assume that
surcharge revenues will increase
annually by 6.99 percent.

The Department of Transportation Services responded by
letter, dated April 7, 1992, as follows:

Thank you for your letter of March 19, 1992.
As you know, we did not use the Council on
Revenue projections in the development of our
Schedule B financing plan. Given their past
history of underestimating revenues, it is
highly unlikely that we will do so in the
future.

At this time, we do not believe Schedule B
requires revision. Should any revisions be
required as we move into more detailed
preliminary engineering and completion of the
final environmental impact statement, these
will be incorporated.

The City administration's response is irresponsible. Based
on the assumptions in the Council Chair's request, surcharge
revenues are computed at $1,454.77 million, an amount $267.79
million less than the $1,722.56 million projected in Schedule B.
A revenue deficit of the magnitude places the financial plan in
jeopardy or portends a surcharge period of longer than ten years.
If the Council is not presented with a realistic financial plan
based on recognized revenue projections, a fully informed
decision cannot be made.

(106) In table 6.5, a note indicates that the general excise
tax surcharge growth rate averages 6.9 percent. That percentage
should be changed to 7.0 percent to more precisely reflect the
rate of increase used by the City administration.

(107) Table 6.5 should include a note enumerating the
interest on bonds, the proceeds of which are necessary to fund
the fixed guideway. According to the table, $828 million worth
of bond proceeds are necessary for construction. Total debt
service payment on the bond proceeds is $1,154.1 million. The
difference is $326.1 million, representing the interest portion
of the debt service.
Table 6.5 shows an ending cash balance of $10.5 million. That amount is:

(A) 0.51 percent of the fixed guideway's capital cost of $2,066.67 million, inclusive of contingency reserve; or

(B) 0.55 percent of the fixed guideway's capital cost of $1,925.62 million, exclusive of contingency reserve.

A discussion should be included on whether the Federal Transit Administration considers that negligible cash balance sufficient for the amended LPA to qualify for a full funding agreement and advancement to final design and construction.

It is emphasized that the negligible cash balance occurs under the City administration's surcharge revenue projection. If the Council on Revenues' projections are used, the cash balance probably will be smaller or in the negative.

Page 6-12 identifies "revenues from development of City properties" as a funding source for the amended LPA's operations and maintenance.

(A) The discussion should specify that "revenues from development of City properties" are generally designated for deposit into the housing assistance fund pursuant to section 6-31.3, Revised Ordinances of Honolulu 1990, as amended. That special fund is intended to provide affordable housing for low- and moderate-income families.

(B) As evident by the proposed use of the joint development revenues, an explicit statement should be made that the City administration considers the fixed guideway a higher priority than affordable housing.

Risk Factors -- 6.1.5.4

Page 6-12 states that "$68 million has been authorized by the ISTEA." The amount should be "$618 million."

Page 6-12 discusses the "magnitude of capital cost" as a risk factor. The discussion should state that the system contract permits change orders and economic price adjustment, with no maximum percentage. Both may increase the capital cost.
(112) Page 6-12 discusses the "yield of dedicated excise tax" as a risk factor. The discussion should be revised to reflect the Council on Revenues' projections of March 16, 1992.

(113) Page 6-16 states the following:

On a daily basis, this [amended LPA's vehicle trip reduction] could amount to decreases in traffic on the order of 5% at key locations. Peak-hour impacts would likely be more significant.

Supporting data should be provided. If not, the statements should be deleted.

Cost-Effectiveness Analysis -- 6.3

(114) Section 6.3 commencing on page 6-17 concerns the cost-effectiveness analysis. The section should include a discussion of the cost effectiveness threshold. The possible consequences of exceeding the threshold should also be discussed.

(115) Table 6.10 on page 6-16 shows an average travel time savings of "6.15" minutes for the amended LPA. Table 4.4 on page 4-4, however, shows an average travel time savings of "6.19" minutes for the amended LPA. The erroneous number in Table 6.10 should be corrected.

(116) In comparison to the expanded bus alternative, the amended LPA will produce annual travel time savings of 8.5 million hours, which is quantified at $23.8 million in 1984 dollars. Although appearing substantial, the travel time savings is illusory under practical circumstances.

First, although the annual travel time savings under the amended LPA is large in quantitative terms, the daily time saving for a transit rider is insignificant for practical purposes. The average travel time of a transit trip under the amended LPA is 6.2 minutes less than under the expanded bus alternative. If a rapid transit rider commuting to work saves 12.4 minutes a day from a round trip and works 250 days a year, the annual time saving is 52 hours. The implication in the SDEIS is that a transit rider will have 52 hours for recreation or other social activities. That implication, however, is incorrect. The annual saving is an accumulation of 6.2 minutes saved during each morning and afternoon. An extra 6.2 minutes in the morning and afternoon does not significantly extend the time available for
other activities. Thus, a saving of 6.2 minutes a trip does not have much practical, meaningful benefit or dollar value to a transit rider.

Second, transit travel time alone is not sufficient to judge the time saving benefit of the amended LPA. No data is provided on the impact of the amended LPA on auto travel time. Since all persons will have to pay for the system, the time savings for auto travelers also should be an evaluation criterion.

(117) The AA/DEIS includes a table 6.19 comparing the capital and operating and maintenance cost per transit rider. Table 6.12 on page 6-19 of the SDEIS should include similar data. Calculations using the rounded numbers in table 6.12 indicate the following:

(A) For the expanded bus alternative, the cost per transit rider is $2.33; and

(B) For the amended LPA, the cost per transit rider is $3.63.

Equity -- 6.4

(118) Section 6.4.3 on page 6-20 discusses the "local financing options equity and burden." A discussion should be included on the impact of the excise tax surcharge on businesses, which will not benefit from an income tax credit.

(119) Under H.B. No. 3164, H.D. 2, S.D. 2, CD-1, recently passed by the Legislature, the tax credit schedule for resident individual taxpayers in counties imposing the surcharge is as follows:

-58-
County General Excise And Use Tax Credit Schedule

<table>
<thead>
<tr>
<th>Adjusted Gross Income</th>
<th>Tax Credit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Under $5,000</td>
<td>$ 25</td>
</tr>
<tr>
<td>$5,000 under $10,000</td>
<td>$ 45</td>
</tr>
<tr>
<td>$10,000 under $15,000</td>
<td>$ 65</td>
</tr>
<tr>
<td>$15,000 under $20,000</td>
<td>$ 90</td>
</tr>
<tr>
<td>$20,000 under $30,000</td>
<td>$110</td>
</tr>
<tr>
<td>$30,000 under $40,000</td>
<td>$125</td>
</tr>
<tr>
<td>$40,000 under $50,000</td>
<td>$145</td>
</tr>
<tr>
<td>$50,000 under $75,000</td>
<td>$185</td>
</tr>
<tr>
<td>$75,000 under $100,000</td>
<td>$205</td>
</tr>
<tr>
<td>$100,000 and over</td>
<td>$210</td>
</tr>
</tbody>
</table>

Absent from the bill is any adjustment of the tax credit amount for the number of qualified exemptions claimed by resident taxpayers. Apparently, the State administration, which proposed the bill, opposes the adjustment of the surcharge tax credit amount according to family size. The absence of an adjustment provision is inconsistent with the other broadly claimable income tax credit intended to offset the general excise tax. That other credit, the food/excise tax credit under section 235-58.8, Hawaii Revised Statutes, is adjustable according to number of qualified exemptions.

Analysis of the income tax credit should be conducted and included in the final EIS. At the minimum, the analysis should address the following:

(A) The net surcharge burden on families with different adjusted gross incomes.

(B) The net surcharge burden on families of different sizes, but with the same adjusted gross incomes.

(C) A comparison of the net surcharge burdens on the following families: family of four with adjusted gross income of $14,999 in comparison to family of two with adjusted gross income of $15,000; family of four with adjusted gross income of $19,999 in comparison to family of two with adjusted gross income of $20,000; family of four with adjusted gross income of $29,999 in comparison to family of two with adjusted gross income of $30,000; family of four with adjusted gross income of $49,999 in comparison to family of two with adjusted gross income of $50,000.

(D) The extent of regressivity of the surcharge, after deduction of the tax credit.
(E) The fairness of the tax credit schedule.

(120) According to the State administration, the surcharge income tax credit is expected to result in a State revenue loss of $50 million annually. That loss, or tax expenditure, will be unavailable for State programs or will have to be replaced by additional State revenues. In effect, the State's tax expenditure also is funding the amended LPA. Given the present and anticipated future State budgetary problems, the tax expenditure can no longer be characterized as funded by the State surplus. Consequently, an analysis should be included in the final EIS on the real burden per resident from the combination of the surcharge and tax expenditure due to the credit.

Significant Trade-Offs Between Alternatives -- 6.5

(121) Page 6-20 includes the following statements:

From the perspective of the annual operating cost, the TSM alternative when compared to the fixed guideway alternative would cost approximately $4 million more per year. Capital costs would be far less, putting less demand on local resources.

(A) The "$4 million" should be changed to "$3.8 million" to more precisely reflect the operating and maintenance cost difference.

(B) Since the operating and maintenance cost difference is specified, fairness requires the capital cost difference to also be expressed. The amended LPA has a capital cost of $1.652.07 million more than the expanded bus alternative. That amount is approximately 435 times the $3.8 million operating and maintenance cost advantage for the amended LPA.

-60-
May 7, 1992

The Honorable John D. Waihee
Governor of Hawaii
c/o Office of Environmental Quality Control
State of Hawaii
Central Pacific Plaza
220 South King Street, 4th Floor
Honolulu, Hawaii 96813

Dear Governor Waihee:

Supplemental Draft Environmental Impact Statement (SDEIS)
Honolulu Rapid Transit Program

Thank you for the opportunity to review and comment on the subject SDEIS. We support the Rapid Transit project and have no additional comments on the SDEIS at this time.

Should you have any questions, please contact Randy Hara of our staff at 523-4483.

[Signature]

BENJAMIN B. LEE
Chief Planning Officer

BBL: 1h

cc: Department of Transportation Services
Office of Rapid Transit
April 6, 1992

Governor John Waihee  
c/o Office of Environmental Quality Control  
State of Hawaii  
Central Pacific Plaza  
220 South King Street, Fourth Floor  
Honolulu, Hawaii  96813

Dear Governor Waihee:

Subject: Supplemental Draft Environmental Impact Statement (SDEIS)  
Honolulu Rapid Transit Program

We have reviewed the SDEIS for the proposed Honolulu Rapid Transit Program and have the following comments.

We support the proposed project and appreciate the effort made to preserve the parks along its route. It would also be desirable to design a transit structure along Kapiolani Boulevard which requires minimum pruning to preserve the integrity and basic character of the monkeypod trees.

Should you have any questions, please contact Lester Lai of our Advance Planning Branch at extension 4696.

Sincerely,

WALTER M. OZAWA, Director

WMO:ei

cc: Office of Rapid Transit  
Department of General Planning
The Honorable John Waihee  
Governor  
State of Hawaii  
c/o Office of Environmental Quality Control  
220 South King Street, Fourth Floor  
Honolulu, Hawaii 96813

Dear Governor Waihee:

Subject: Honolulu Rapid Transit Program  
Supplemental Draft Environmental Impact Statement

We have reviewed the application for the environmental impact statement and have no comments regarding the Honolulu Rapid Transit Program.

We have been working with the Office of Rapid Transit and the Department of General Planning in the development of this program.

Should additional information or assistance be required, please call Captain August K. F. Range of our Fire Prevention Bureau at 943-3166.

Very truly yours,

LIONEL E. CAMARA  
Fire Chief

LEC/AKFR: mc

cc: Office of Rapid Transit  
Department of General Planning
May 7, 1992

Governor, State of Hawaii
c/o Office of Environmental Quality Control
220 S. King Street, Forth Floor
Honolulu, Hawaii 96813

Re: Honolulu Rapid Transit Program Supplemental Draft EIS

To whom it may concern:

This is to convey a question posed by the Manoa Neighborhood Board concerning the legality of the locating the proposed rail terminus on land owned by the University of Hawaii in the area known as the "quarry." Nothing in the Supplemental Draft Environmental Impact Statement addresses this question whatsoever and to date, neither the City nor State administrations have been able to answer this "threshold" question on the legality of the proposed terminus location in the UH Quarry.

Article X, Section 5 of the Hawaii Constitution reads in relevant part: "The University of Hawaii... shall have title to all the real and personal property now or hereafter set aside or conveyed to it, which shall be held in public trust for its purposes, to be administered and disposed of as provided by law." (emphasis added)

Hawaii Revised Statutes §304-4(a) reads in relevant part: "All lands, buildings, appliances, and other property so purchased or acquired shall be and remain the property of the university to be used in perpetuity for the benefit of the university." (emphasis added)

A plain reading of these and other relevant statutory provisions pertaining to the various functions of the University of Hawaii appears to indicate that all university land including the proposed rail terminus location in the quarry must be used exclusively for traditional university purposes of education and training and for providing related ancillary services and facilities for use by primarily by students, faculty and university staff. The University's faculty and student housing and parking facilities are obvious examples of university facilities which have always been restricted to use by faculty, staff, students and official visitors to the university.
Governor, State of Hawaii
Re: Honolulu Rapid Transit Program Supplemental Draft EIS
May 7, 1992
Page 2

A permanent municipal rail transit terminus serving the entire East Honolulu community from the UH Quarry is obviously not a legitimate, primary higher education function and it does not appear to serve any other traditional "university purpose" related to the University's mission of providing higher education. The proposed terminus location on University land therefore does not appear to be a legally permissible use of this area by the Honolulu Rapid Transit Program.

Indeed, on two separate occasions over the past several years involving the proposed use of the University's vacant land fronting Woodlawn Drive and Lowery Avenue in Manoa Valley, the Manoa Neighborhood Board was informed by the University of Hawaii that the land could not be used for: 1) the City's elderly housing project (which is nearing completion adjacent to Manoa Elementary School) or 2) for the State's Weinberg Villages homeless relocation project.

The Manoa Neighborhood Board was informed by University administration representatives that the "university purpose" restriction prohibited the UH Board of Regents from permitting use of this vacant land for any non-university purpose no matter how worthy the proposed non-university purpose.

The University obtained a legal opinion from Deputy Attorney General Edwin Watson several years ago which indicated that the Regents could not permit the City's elderly housing project to be located on the University's vacant land in Manoa Valley without at least first having a concurrent resolution adopted by the Legislature permitting such non-university use.

Accordingly, the Manoa Neighborhood Board believes there is a significant, unanswered question on whether the rail transit terminus can be legally situated on any University of Hawaii land. However, to date, neither the City nor the State administrations have provided any justification which would lawfully permit location of the terminus in the quarry.
Governor, State of Hawaii
Re: Honolulu Rapid Transit Program Supplemental Draft EIS
May 7, 1992
Page 3

We respectfully request that this question be clearly and exhaustively addressed by the Honolulu Rapid Transit Program and the State administration at the earliest possible date.

Sincerely,

[Signature]

John C. McLaren
Chairperson

cc: Frank J. Doyle/Office of Rapid Transit
Benjamin Lee/Dept. of General Planning
Lieutenant Governor Benjamin Cayetano
Senator Ann Kobayashi
Representative Brian Taniguchi
Councilmember Andy Mirikitani
Councilmember Arnold Morgado
H. Howard Stephenson/UH Board of Regents
Ralph Horii/UH
May 7, 1992

Mr. Frank Doyle
Manager and Chief Engineer
Office of Rapid Transit
Department of Transportation Services
650 S. King St. 3rd floor
Honolulu, HI 96813

Dear Mr. Doyle:

This letter is in response to the Supplemental Draft Environmental Impact Statement made available to our Board in March. This response to your EIS contains our initial comments of the environmental impacts the rapid transit development will have on McCully-Moiliili.

Community Characteristics

The Moiliili neighborhood is a vibrant, bustling residential and commercial community with all types of housing, businesses, and community services. It has some unique characteristics and attracts people who like an urban area close to work and leisure opportunities. Although we recognize its importance as an urban setting, its environment should not all be concrete. It should include pedestrian features, pleasing architecture, attractive storefronts and setbacks, plantings and open spaces. The University Ave./S. King St. area is already a major intersection not only for area residents but also for many others who pass through daily. We do not want it to be merely a traffic corridor and a location for major public facilities which are unsightly, dangerous, and of little benefit to its residents. We recognize that residents living in close proximity to the transit stations will benefit from having easy access to the rail transit. However, we do not want the overall impacts of this major development to be more harmful than helpful to us.

Viewplanes

First, the photos of the three stations in or near our community were not included in the draft EIS; therefore, we were unable to get a visual idea of how they will affect views. We request that these be included in the next EIS.
We agree with your statement that the rapid transit may be considered a visual intrusion of the neighborhood. The view up University Ave. towards the Koolau Mountain range is now one of our neighborhood's most attractive viewplanes. The views of the train and its structures from residential and business windows are also intrusive and discussed below. We do not understand why some people are concerned about the visual impact of an aerial transit along the waterfront in downtown Honolulu but do not seem at all concerned with its impact on our neighborhood.

Although many residences along the route are two or three story buildings, they will still look out at the platform columns. The 845 University Ave. apartment bldg is a mid-rise bldg. and residents at 4th floor or above will look out at the trains coming by. Several condominiums on Kapiolani Blvd. will be severely impacted by the train and its structures which will annoy them and block their views. Views of trees in median strips or neighborhood sites will be replaced by concrete structures. Lighting on the platforms and trains and its effect on residents along the route should be explained.

The overpass at Isenberg and Kapiolani will also affect the viewplane up Kapiolani Blvd. and may affect views out apartment windows or cause noise from pedestrians.

Noise and Pollution

It is stated that noise from the train will be minimal and less than noise from regular vehicular traffic. The train may not add much more noise; however, we don't know that auto traffic will decrease and we do know that bus traffic will increase, so it's almost certain that noise from traffic will increase in our neighborhood. Likewise, air pollution, especially from the increased bus traffic, will affect our neighborhood.

Park 'n Rides and Traffic in General

The draft EIS states that there will be no adverse impacts from the proposed park 'n rides. We disagree. The impacts we can expect for these businesses, residences, and others who use that busy area will include noise, air pollution, increased traffic, and disruption to the flow of traffic and use of area facilities.

Businesses will be displaced although you note that not many will be affected. A park 'n ride at University and S. King would displace all of them at University Square as well as in the 931 University Ave. commercial bldg. (site of the station). These are more businesses than you counted. Parking currently available for University Square (fronting S. King and fronting
Kahuna Lane) would also be removed. Those stalls should be counted and figured into the difference between what is currently provided and what will be provided by a park n' ride.

Unless the proposed park n' ride behind the Varsity Theatre becomes a multi-deck structure, the site cannot support many more cars in the daytime than it currently holds. Business people who park there will have to find new parking spaces if they are displaced by transit users.

If drivers to the park n' ride use interior streets (Kuilei and Kahuna) to reach the park n' ride structure (entrance on map shown at Kuilei St.) it will cause additional traffic impacts to residents in the Moiliili Triangle neighborhood (bounded by Kapiolani/Date/S. King/University Ave.). These are currently small, quiet residential streets which are not adequate and proper for major through traffic. Attempts should be made to prevent through traffic on these streets, left turns into the park n' rides, and new stop lights which will back up traffic even further in the Univ. and S. King St. area. This area must remain safe for pedestrians, bikers, and drivers alike. It is currently heavily congested during the rush hours and even later in the evenings and on weekends.

Additionally, drivers may attempt to park on the streets in the areas rather than pay the cost of parking or face the traffic of getting in and out of the structure. This will adversely affect area residents and businesses.

Although homes would not be taken for the park n' ride, residents will be impacted especially at the 2626 Kuilei St. apartment bldg. and Kuilei Gardens apartments, both right next to the station and park n' rides.

For these reasons we would favor the park n' ride alternative at the Oasis nightclub site.

Apartment residents all along University Ave., and especially those mentioned right at the station and across the street (908 and 918 University Ave.) will be greatly impacted, as will those on Kapiolani Blvd. The Moiliili Hongwanji Mission (902 University) which has not only religious services but a preschool will be affected by additional traffic, removal of on-street parking, and views. The KCCA Mother Rice Preschool, a block up S. King St. from the site of the proposed park n' ride will undoubtedly have its flow of traffic in and out affected. Moiliili Community Center at 2335 S. King St. has its traffic exiting from Kuilei St. to University Ave. across from the proposed station site and park n' ride. More buses coming to load and unload at the stations and more cars coming to park in the structure will greatly impact everyone in this neighborhood.
The draft EIS states that the taking of ten parking spaces along University Ave. will have no adverse impact. Because these are currently used by residents who live in the buildings, attend functions, or work in the neighborhood, it will remove them from their use. Moliili is known for its problems caused by lack of adequate parking. We are also not convinced that only ten spaces will be eliminated.

You noted that a decrease in auto traffic will be replaced with an increase in bus traffic. We understand that feeder buses coming to the stations will increase the bus traffic considerably. However, we are not as convinced that auto traffic will decrease, especially with autos coming to the park 'n ride at the stations and many drivers unwilling to use the transit system.

Additional Impacts

The EIS does not mention that a massive electrical substation will be required somewhere in the vicinity of University Ave. mauka of S. King St. in order to provide additional electrical energy capacity to propel the trains over H-1. The Rapid Transit Division has said that this ancillary room will be 22 ft by 62 ft. and will require a grade-level site 60 ft. by 120 ft. Depending on its location and design, this facility could have very serious impacts on businesses and residences in this area. We do not believe it can go underground because of the underground water mentioned below.

The relocation of overhead power lines along University Ave. was not mentioned, but if their movement would cause additional construction work and inconvenience to residents, this should be discussed.

The loss of trees in the median strip on Kapiolani and any trees lost along University Ave. will diminish the neighborhood's attractiveness and increase the effects of carbon monoxide in the air.

The impacts of increased development at station sites and along the route should be discussed in more detail. We believe this will cause even greater impacts like those mentioned earlier.

We agree with the listing of the Church of the Crossroads as a historic site, but would suggest the additions of the Moliili Hongwanji and the Moliili Community Center. Although MCC does not sit directly on the route, it is a major community facility very close by and was established in 1898.

Financial impacts on residents who own condominiums at transit-view level along the route have not been discussed. Viewing a train out a living room window or lanai should decrease the value of your home.
We agree with your statements that the extra 1/2% excise tax is a regressive tax which will have economic impacts on all of our residents.

Finally, we would like the draft EIS to include information about how the underground streams and caves in the University/S. King St. area would affect the cost of transit structures and use of local properties for this intensive development. Past development experiences in this area have shown that these subsurface conditions may limit high density development which requires digging and driving of piles. Any possible effects on the stream that runs behind Hausten and Coolidge Sts. and crosses Kapiolani by Isenberg St. should also be discussed.

We look forward to your responses to our comments in the IES. Should you have any questions, please call.

Sincerely,

Charles McClure, Chair

cc:  Mr. Francis S. Oda, Group 70 Architects
Councilmember Leigh-Wai Doo
Councilmember Andy Mirikitani
Senator Mary-Jane McMurdo
Representative Duke Bainum
Representative David Hagino
Representative Mazie Hirono
April 29, 1992

The Honorable John Waihee
Governor
State of Hawaii
c/o Office of Environmental Quality Control
220 South King Street, Fourth Floor
Honolulu, Hawaii 96813

Dear Governor Waihee:

We have reviewed the draft supplemental environmental impact statement for the Honolulu Rapid Transit Program. At this time, we have nothing to add to the comments previously submitted.

Thank you for the opportunity to comment.

Sincerely,

MICHAEL S. NAKAMURA
Chief of Police

By

HERBERT D. HUGHES
Assistant Chief of Police
Support Services Bureau

cc: Office of Rapid Transit
Department of General Planning
APRIL 23, 1992

Mr. Joseph Magalde, Director, Department of Transportation Services
Frank Doyle, Manager and Chief Engineer
Office of Rapid Transit
Department of Transportation Services
City and County of Honolulu

Re: Supplemental Draft Environmental Impact Statement (SDEIS) for the Honolulu Rapid Transit Program

Mr. Joseph Magalde,
Mr. Frank Doyle,

I'm Anita Benfatti, Chair of the Waikiki Neighborhood Board. I'm speaking for the Board. At its February 4, 1992 Regular Meeting, the Board reaffirmed its opposition to the fixed rail guideway system within Waikiki and on Oahu. The motion carried with 14 ayes, 0 nayes and 1 abstention (see attachment A). The most welcome change studied in the SDEIS is the elimination of the Waikiki segment. The resurrection of the Waikiki option, within the proposed fixed rail guideway system, must not be permitted under any circumstances. Planning consultants for the City's Waikiki Master Plan and the Waikiki 2020 Committee, as well as the City Council, in their wisdom, all eliminated the Waikiki option for fixed rail in their recommendations and decisions for transportation alternatives in Waikiki. Let's not startle our visitors and residents with a concrete jungle along the roads of Waikiki. Let's not permit intrusive concrete pillars and humongous rail transit structures to further obstruct our magnificent viewplanes of ocean, sky and mountains. Fixed rail transit does nothing to enhance the image of our tropical island. Let's keep Hawaii, Hawaii. Our Board members have strongly opposed the proposal to increase the Excise Tax to pay for

Attachment A

Oahu's Neighborhood Board System Established 1873
RAIL TRANSIT. GROWING NUMBERS OF OUR CITIZENS OPPOSE THE USE OF FEDERAL, STATE AND CITY TAX DOLLARS TO FUND RAIL TRANSIT. LET'S LISTEN MORE CLOSELY TO THE PEOPLE'S PRIORITIES AND MAKE WISER CHOICES FOR MORE EFFECTIVE UTILIZATION OF OUR PRECIOUS TAX DOLLARS TO BENEFIT THE PUBLIC'S INTEREST. THANK YOU FOR THE OPPORTUNITY TO TESTIFY.

ANITA BENGATTI
CHAIR
WAIKIKAI NEIGHBORHOOD BOARD

Oahu's Neighborhood Board System-Established 1973
At 8:30 p.m. a recess was called. David Pryor left the meeting. The meeting resumed at 8:40 p.m.

B. Transportation Committee:

1. Downing-Butler suggested that the Board reaffirm the Board's opposition to the fixed rail guideway system within Waikiki and on Oahu. She felt that this "new" Board should reconfirm its position. Downing-Butler so moved her recommendation. Capone seconded the motion. Rack ward it made clear that he does work for the City, but does not work for the Transportation or Transit Departments. The motion carried, 16-0-1. ABSTENTION: Rack.

2. Bren read a statement which said that the people are strongly opposed to the Excise Tax rate increase to help fund rapid transit. Cheaper alternatives can be found. People want to see this project and the tax increase deferred.

At 8:45 p.m. Virginia Gragel left the meeting.

C. Housing Committee:

1. Rick Schneider, Councilmember Mikiyama's Office, reported that Bill 79, which requires landlords/developers to help find housing or provide financial aid to displaced tenants, has passed out of committee. It will now be heard by the full Council.

Pullan said that the bill gives the landlords/developers the option to provide displaced tenants with housing within a 10 mile radius of their current home or provide funds for six months rent.

D. Business and Tourism:

1. Delany reported on the recent events where Henry Horita and his partners have pulled out of the International Market Place Convention Center Project for a lack of financing. The 5.2 acre parcel will still be redeveloped, at a future date. Many other Japanese investors, including Dasich, are also over extended. The Waikiki Convention Center Authority (WCCA) should be terminated on October 1, 1992. Rep. Takihou said she supports extending the WCCA in order that it be allowed to find another convention center location.

An article in the February 5, 1992 MidWeek by Larry Price was read. (Attachment B)

2. Bren reported that the parent company of the Honolulu Convention Center has filed a $5 billion suit in Japan.

E. Parks, Recreation, and Waikiki Beach: No report.
4.0 COMMUNITY, CIVIL AND BUSINESS ASSOCIATIONS
COST!       The Committee On Sensible Transit

TESTIMONY OF CLIFF SLATER, CHAIR OF COST -- THE
COMMITTEE ON SENSIBLE TRANSIT -- ON THE SUPPLEMENTAL DRAFT
ENVIRONMENTAL IMPACT STATEMENT (SDEIS) BEFORE THE DEPARTMENT
OF TRANSPORTATION SERVICES/ CITY AND COUNTY OF HONOLULU ON

1. Energy. It is imperative that the SDEIS quantify
fuel savings to back up city claims that rail transit is
energy efficient. Our calculations show that the
electrical energy needed to fuel rail transit will be
greater than the gasoline saved from the projected reduction
in automobile use. The energy required during the
construction phase should also be quantified.

2. Traffic Congestion. The City claims in verbal
presentations that rail transit will lead to an 8% reduction
in auto vehicle miles travelled (AVMT) in certain corridors
during rush hour. It has failed to produce any credible
calculation to back this up.

On the other hand, the SDEIS says that overall AVMT
will only decline by 1.1%. The assessments of traffic
reduction at various intersections also indicates little or
no impact on congestion. The City should publish projected
screenline traffic impacts for the year 2005 with and
without rail transit. These have been calculated already by
Wilbur Smith & Associates as part of the HALI 2005 study.

1. Per p.5-24, SDEIS, AVMT would be reduced by 89 million
miles. Divided by 20 mpg equals 4.5 million gallons.
Using $1.40 per gallon means savings of $6.2 million.
Bus mileage would increase by 4% which would increase
bus fuel usage by $0.2 million. The City forecasts
electrical usage at $8 million. Net increase is $2
million.

2. p. 5-24, SDEIS.

3. p. 4-16, SDEIS.

1750 Kalia Ave, Suite 3-833, Honolulu, Hawaii 96815 PH: 948-0733 FAX 948-0406
3. **Growth in State's general excise tax (GET).** COST cannot find any support in the business community for a projected 7% average growth in GET for Honolulu. The City must provide support in the SDEIS for this claim.

4. **Claimed growth in bus ridership.** In the SDEIS the City claims a 9% increase in bus ridership over the last five years. It fails to state that the ridership data used were estimates from two different surveys in 1986 and 1991 which do not tie together. The City's 1991 Short Range Transit Plan Update (SRTPU) on the other hand shows no increase in bus ridership.

To also reinforce its claim of increasing bus ridership the City says that bus revenues increased from 1984 to 1990. It fails to state that a fare increase was effected in 1985 leading to a one-time jump in fare collections in 1985. Collections have declined since 1985. The City's statements are grossly misleading. They should be restated and ridership data in the SRTPU and the SDEIS reconciled.

5. **Understated Transit Travel Times.** The SDEIS claims an average two minute wait for a bus and a one minute walk from the Nimitz downtown stations to work. Using such data the City constructs an argument for reduced transit travel times. For example, the City shows a ten minute reduction in transit travel time between Ewa and Downtown. However, eight minutes of the decline is derived from a reduction in the time allowed to wait for the bus and the other two minutes a reduction in the walk to work time. The transit time is the same!

6. **TSM Alternative Ridership Understated.** The City's TSM Alternative uses 964 buses, a 95% increase over the No-Build fleet. The City claims this will only increase ridership by 9.8%. In fact, if this 95% increase in buses were to lead to only a 29% increase in bus riders it would result in more riders for TSM alone than bus and rail combined! The City needs a more credible position on this matter.

7. **Farebox Revenues Overstated.** Farebox revenues are projected to grow each year even allowing for inflation.

---

4 p. 4-4, Table 4.3, SDEIS.

5 p. 2-16, Table 2.3 & p. 5-25, Table 5-9, SDEIS.
This despite fares climbing 4% a year and no increase in the level of service. This is at odds with the City's experiences over the past seven years. Fare collections have declined despite a 13% increase in buses. Revenues should be restated to reflect a more realistic approach.

8. **Job Reduction.** Section 5.1.5 specifies that rail's economic effects may cause a reduction in non-construction jobs. This needs further elaboration.

9. **Renderings Are Misleading.** The renderings showing areas of Honolulu before and after rail construction, such as pp.5-73 & 74, grossly understate the visual impact of rail. The City must reconcile its renderings with those of the American Institute of Architects, Hawaii Chapter.
Honolulu Taxpayers For Traffic Solutions

April 2, 1992

Dear Office of Rapid Transit:

Some are viewing the Nimitz Highway alignment of Honolulu's rapid transit system in the wrong light. Instead of viewing the decision as an alternate to a preferred route, it should be seen as a win-win situation that not only saves Hawaii residents more than $300 million but also offers a tremendous potential benefit to the future of Honolulu.

For years, the state has been pursuing the revitalization of our Honolulu Harbor Waterfront. They want the waterfront to become a place for people. A place for families to gather for leisure activities, shopping and cultural events with Aloha Tower being reborn as the focal point and symbol of Honolulu.

What better way to support this vision than by giving residents and visitors access to the waterfront via a modern rail system.

The City and the developer have already expressed their willingness to work with the community to design the system so that it is readily integrated into the area and the surrounding landscape. I see no reason why this cannot be done with our waterfront.

I believe the system can be designed to complement our waterfront. Instead of riding through downtown in a dark tunnel and emerging in the midst of some Honolulu skyscrapers, people will enjoy the scenic beauty of our waterfront and step off the system right into our renovated Aloha Tower complex.

This is the possibility I see. And this is why I support the City's decision.

Warm Aloha,

Lex Brodie
Mr. Chair:

My name is Arlene Kim Ellis and I am president of the League of Women Voters of Honolulu.

The criticisms we made two years ago at the May 8, 1990 Public Hearing and in our written analysis of the AA-DEIS dated May 22, 1990, were not addressed in the current SDEIS. On the contrary, we can no longer find, as on p.2 of our 1991 analysis, that the DEIS is "more objective and credible than its ten-year old predecessor, the AA-DEIS prepared for the HART program".

The 1990 projections showed the increase in transit ridership (over a TSM system) to be minimal (less than one percent of total daily trips); indicated no significant decrease in daily vehicle miles traveled or in air pollution; and showed a Cost Effectiveness Index barely within the Federal requirements.

The 1992's cost projections show an increase of approximately 75% over 1990's estimates after allowance is made for the elimination of the Waikiki sector of the rail structure and of the Hotel Street subway in favor of Nimitz above ground. Thus the 1990 ridership projections could no longer meet the Federal CEI threshold.

No problem: rail ridership projections with Waikiki eliminated went up 34% (140,000 to 187,400); total transit ridership went up 24% (255,100 to 315,400); fixed guideway trips to and from downtown increased 65% (45,100 to 74,500); and the projected increase in transit ridership over the TSM alternative shot up to 80% (25,500 to 46,000), just coincidentally a little higher than costs increased, thus leaving the projected CEI just about the same as calculated in the 1990 AA-DEIS.

The justification for these increases in ridership is said to be the 1990 Census which, it is alleged, points to greater population and employment growth than previously expected. This goes quite contrary to State Economist Gregory Pai's statement a couple of months
ago to the effect that the State's M-K projections, used by the
City as the population variable for the ridership projections,
are probably too high and that therefore the then current ridership
projections -- increased since then as indicated above -- might
need to be revised downward.

We cannot in three minutes cover our many other criticisms
of and questions about the SDEIS. We will try in our written
comments to be submitted by May 7. In the meantime, there is one
point we would like to make which we have previously made. Based
on a table on p. 5 of Vancouver transit supporter Tom Parkinson's
evaluation of the 1990 AA-DEIS, made for the UH study commissioned
by the State, we worked out daily rail passengers projected for
Honolulu per 1,000 population and compared it with Mr. Parkinson's
figures for a number of other U.S. cities with light rail guideways
-- cities ranging in metropolitan populations of 1,200,000 to
2,900,000, compared with Honolulu's 845,000. Whereas actual rail
ridership as shown by Parkinson, was 10 per 1,000 population in
San Diego, 13 in Sacramento, 14 in Portland, 23 in Baltimore, 12
in Miami, 13 in Pittsburgh, 26 in Buffalo, projected ridership in
Honolulu was 206 per 1,000. With the 1992 rail ridership projection,
Honolulu's ratio would be even higher. Even with a projected
future island population of one million, it would be 188. Rail
proponents tell us that Honolulu is a high transit using area,
but 10 to 20 times as high as these other, larger metropolitan
area?

As they say nowadays, give us a break!

Thank you.
May 6, 1992

The Honorable John Waihee
Governor, State of Hawaii
c/o Office of Environmental Quality Control
220 South King Street Fourth Floor
Honolulu, Hawaii 96813

Dear Governor Waihee:

Enclosed please find our comments on the Supplementary Draft Environmental Impact Statement for the proposed Honolulu Rapid Transit Program.

Sincerely,

Arlene Kim Ellis
President

Astrid Monson
Chair, Planning & Zoning

Copies to:
Frank J. Doyle
Benjamin B. Lee
COMMENTS ON THE SUPPLEMENTARY DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE HONOLULU RAPID TRANSIT PROGRAM, MARCH 1992

We have analyzed and interpreted this Supplementary DEIS as an addendum to the original AA-DEIS of March 1990. In essence, it adds an Alternative #12 (the amended LPA) to the eleven alternatives in the original draft, and revises certain key projections - ridership, costs, CEI, financing, etc. allegedly in the light of later census and other data.

We therefore consider our 1990 comments to apply to the combined drafts and attach copies of our oral comments of 5/8/90 and our written comments of 5/22/90.

The questions and criticisms we made two years ago regarding such issues as the structuring and treatment of the non-rail alternatives, the lack of an index to help the public find specific material, the unreasonableness of the rail ridership projections as compared with actual rail ridership in cities of comparable or greater size, the inexplicably low ridership projections for a TSM-Bus system, the trip time comparisons, the assumed unchanging fare structure, etc., are, we submit, still valid. So, we feel, is the evaluation we made in 1990 of the differences between TSM and rail systems, though the actual figures in the SDEIS are now different. Rather than commenting on each and every one of the detailed items we could question or criticize in it, we will confine this statement to four major issues.

1. The Amended LPA
2. Ridership projections
3. Current cost projections
4. Financing plan

1. The Amended LPA

As early as 1967, the Oahu Transportation Study, which first dealt with a rail guideway for Honolulu, concluded that the population of Oahu was too small to afford a subway and that its only possibility for rail transit would be an elevated system. Because of the opposition of downtown interests to such a structure in the heart of the city, the 1980 LPA proposed a subway downtown. Later, Waikiki similarly objected to an elevated guideway on Kuhio, and urged an underground segment there as well.

The SDEIS, for cost reasons, rejects all subways - Hotel Street, King Street, and Waikiki - and, instead, shapes the Amended LPA to eliminate any kind of fixed rail in Waikiki and routes an elevated guideway at the southern, ocean-front edge of downtown instead of through its center along Hotel or King Streets.

a. In our opinion, this route calls the whole project into even more question than already existed. Downtown, most passengers would have to transfer an additional time, by trolley, shuttle, bus, or whatever - to and from their destination. (Note that the SDEIS shows 53% of all rail-bus passengers transferring at least once and 14% two or more times.)

We would like to ask what justification there can be for increasing
projected daily fixed guideway trips to and from downtown by 65% from the 1980 AA-DEIS estimate — from 45,000 to 74,500 in spite of the obvious and admitted decrease in accessibility and convenience when the Hotel Street route was changed to Nimitz.

b. Similarly, the current proposal is for Waikiki passengers to be brought to the nearest rail station — presumably Kalakaua-Kapiolani — by some form of trolley or shuttle. The large number of tourists bound for the Ala Moana Shopping Center would then ride for exactly one stop on the guideway. Is this realistic? When elimination of the Waikiki segment from the rail route was first announced, the daily rail ridership projection was decreased from 165,000 in the 1990 AA-DEIS to 140,000 in the current SDEIS. However, in spite of both the Waikiki and downtown changes, the projection went up 34%, to 187,400. What was the justification for this?

c. Various cost estimates for including two subway segments — downtown and Waikiki — have appeared in the press, generally adding between $500 and $700 million, or roughly 25 to 35%, to the project costs estimated in the current SDEIS. We respect the opinions of those, like the AIA, who argue that if the rail system is built at all it should be built right, and that we should not construct an ugly, intrusive monster like the San Francisco Embarcadero, in our front yard. Since we have opposed the entire project as embodied in the original AA-DEIS, we can only point out that paying the additional cost of putting it underground would not make it any less undesirable in our view.

2. Current Ridership Projections

Although the 1990 AA-DEIS ridership projections raised many questions, we did not base our opposition to the rail system on them. We found them to be more reasonable than those on which the 1979 HART AA-DEIS was based.

Since we were in no position to produce more credible projections, and since, even accepting the 1990 AA-DEIS projections, no convincing case could be made for a large enough increase in transit ridership, or a large enough decrease in traffic congestion, or air-pollution, to justify building rail, we used them in our analysis.

a. The current draft, however, marks so great a departure from the 1990 AA-DEIS that we must comment on it. Here are a few basic comparisons:

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<tr>
<td>Existing daily bus ridership</td>
<td>ALT. 3</td>
<td>AMENDED I PA</td>
<td></td>
</tr>
<tr>
<td>1986</td>
<td>187,700</td>
<td>206,500</td>
<td>18,800 (10%)</td>
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<td>1991</td>
<td></td>
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<tr>
<td>2005 Total transit ridership</td>
<td>229,600</td>
<td>269,400</td>
<td>39,800 (17%)</td>
</tr>
<tr>
<td>TSM</td>
<td>255,100</td>
<td>315,400</td>
<td>60,300 (24%)</td>
</tr>
<tr>
<td>Rail-bus</td>
<td>25,500</td>
<td>46,000</td>
<td>20,500 (80%)</td>
</tr>
<tr>
<td>Difference</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2005 Rail ridership only</td>
<td>165,100</td>
<td>187,400</td>
<td>47,400 (34%)</td>
</tr>
<tr>
<td>Without Waikiki</td>
<td>140,000</td>
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The basis of the 1992 SDEIS' increases over the projections made in the 1990 AA-DEIS is not clear to us. On p. S-21, it is suggested that they are due to more current data available from the 1990 census, which led to higher population and employment forecasts for the year 2005, and resulted in 2005 patronage (ridership) levels 13% higher than in the AA-DEIS. It is also claimed that the "existing" ridership and service data used in 1986 were lower than the "existing" information for 1981, which, as shown above, showed a 10% ridership increase between 1986 and 1991.

b. We must question this alleged increase. The State of Hawaii's 1991 Data Book, Table 518, Public Transit for Oahu, 1980 to 1991, shows no discernible increase in Transit passengers during the period indicated. The annual total varies between 74 and 76 million between 1982 and 1990, reaching the highest number in 1984. These totals include transfers, free rides (senior citizens and handicapped) and other problems making it difficult to compare them with daily totals, but they show no evidence of a 10% increase between 1986 and 1991. Revenues are almost constant, within a narrow range between $18 and $19 million a year, with 1985 the highest.

c. Population projections for the year 2005 have actually been lowered by the State since the 1990 Census, not increased. The M-K series population projected for Oahu for the year 2005, the basis of the City's Transit and other planning studies, was 981,000 in the 1990 AA-DEIS, but was adjusted to 931,800 in the 1992 SDEIS - a decrease of 3%. Can this be a basis for increases, as indicated above, of 24% in projected Transit ridership or of 34% in rail patronage?

d. As we pointed out in our testimony of 5/8/90, item 5, the Honolulu rail ridership projections are grossly out of line with the actual experience of other metropolitan cities. This fact was corroborated recently from material published by Vancouver Transit expert Tom Parkinson, a well-known supporter of rail. From p.6 of his paper evaluating the 1990 AA-DEIS, which he prepared for the U.H. report commissioned by the State, we worked out the number of rail passengers per 1,000 population for U.S. cities he listed:

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<tbody>
<tr>
<td>Honolulu (alt. 4)</td>
<td>175,000 (Projected)</td>
<td>836,000</td>
<td>209</td>
</tr>
<tr>
<td>San Diego</td>
<td>21,000</td>
<td>2,498,000</td>
<td>8</td>
</tr>
<tr>
<td>Sacramento</td>
<td>19,000</td>
<td>1,481,000</td>
<td>11</td>
</tr>
<tr>
<td>Portland</td>
<td>19,000</td>
<td>1,478,000</td>
<td>13</td>
</tr>
<tr>
<td>Honolulu (alt. 10)</td>
<td>135,000 (Projected)</td>
<td>836,000</td>
<td>161</td>
</tr>
<tr>
<td>Baltimore</td>
<td>52,000</td>
<td>2,382,000</td>
<td>22</td>
</tr>
<tr>
<td>Miami/Ft.Lauderdale</td>
<td>34,000</td>
<td>3,198,000</td>
<td>11</td>
</tr>
<tr>
<td>Pittsburgh</td>
<td>30,000</td>
<td>2,243,000</td>
<td>13</td>
</tr>
<tr>
<td>Buffalo</td>
<td>20,000</td>
<td>1,189,000</td>
<td>17</td>
</tr>
</tbody>
</table>

e. The increases in projected ridership shown in a. above could be dismissed as just the usual attempts EISs make to try to justify the projects they are describing, were it not for the necessity to show...
a favorable Cost Effectiveness Index. As will be explained under 3.
below, our analysis shows that when allowance is made for elimination
of the Waikiki rail segment and substitution of an elevated structure
on Nimitz, for the Hotel Street subway, comparable construction costs
have increased about 87%, as between those estimated in the 1990 AA-
DEIS and the 1992 SDEIS. Since the CEI is essentially the ratio be-
tween 1) rail construction costs compared with those of a TSM system
and 2) the number of additional transit riders with rail compared with
a TSM system, it is evident that if the 1992 costs were related to the
1990 ridership estimates, the result would be a CEI far above the
permissible Federal Maximum. We draw no invidious conclusions, but
our table in a. above shows increased transit ridership for rail over
TSM 80% greater in the 1992 SDEIS than in the 1990 AA-DEIS.

3. Cost Projections

The 1990 AA-DEIS projected a capital cost for alternative #3 —
the then LPA — of $1.425 billion, including $1.240 billion for the
fixed guideway and $.185 billion for bus-related capital costs. These
translated into total annualized costs of $153 million — $132 million
for the fixed guideway and $21 million bus-related. With annualized
O & M costs added, the total annualized costs were projected at $254.5
million — $167 million for the fixed guideway and $87.5 million bus-
related. With a deduction of $28.4 million for the alleged value of
travel time saved, the $111.4 million difference between the annualized
costs of Alt. 3 and the TSM, divided by the 8 million difference in
projected annual transit riders, was said to yield a Cost Effectiveness
Index for Alt. #3 of $9.19.

a. Our computations result in a higher CEI. From p.6-30 of the 1990
AA-DEIS, we calculate as follows:

Annualized capital cost difference:
$152.8 million less $41.4 million = $111.4 million
Less travel time savings $28.4 million = $83.0 million

Annual transit riders difference:
79.4 million less 71.4 million = 8 million
$83.0 million + 8 million = $10.375 CEI

b. Be that as it may, the 1992 SDEIS shows a considerably different
picture. Total fixed guideway capital costs, now in 1991 dollars, are
shown as $1.764 billion for the amended LPA with an elevated route re-
placing the Hotel Street subway and with Waikiki eliminated. The
original LPA would now cost $2.316 billion. To this must be added
$.213 billion for bus-related capital costs, excluding the cost of HOV/
bus lanes facilities which it is our understanding were included in the
1990 total AA/DEIS cost estimates of $1.425 billion including bus-
related and highway facilities capital costs.

c. To estimate what the 1990 AA-DEIS cost projection would have
been for the current Amended LPA, we used the proportion from the SDEIS,
p. 6-8, that the current Amended LPA cost of the fixed guideway alone
is of the base AA-DEIS's LPA, namely 76.2% . The $1.240 billion would
then have been only $.945 billion. The SDEIS cost projection for the
amended LPA is $1.764 billion — an increase of 87% over our estimated
cost as it would have been for the amended LPA in the 1990 AA-DEIS.
Allowing for factors we may not have taken into account, we submit that
the 1992 cost estimates are at least 80% over those made in 1990.

d. It is obvious that an 80% cost increase would have resulted in
   a CEI not of $9.00 or $10.00, but closer to $16.00 or $18.00 - far
   beyond the permissible threshold. As noted above in 2 e, this problem
   was solved when the ridership estimates were revised upward. As it
   happens, the projected increase in ridership also came out at 80%
   (daily average 25,000 rose to 46,000) -- a serendipitous coincidence
   indeed, and one which left the CEI essentially unchanged at $9.53 in
   1991 dollars.

e. It would be hard to accept this without question, and we do not.
   What is the real basis for the projected ridership increases? And
   what will the City do when the 37% of current project cost estimates
   which are not part of the main system contract (stations, land aquisi-
   tions, etc.) end up costing significantly more than estimated?
   More ridership increases?

f. Please note that to the capital costs for the guideway shown in
   the SDEIS Table 6.5, interest of $326.10 million on City and State
   bonds borrowed in the early part of the ten year construction period
   and repaid in the later years, must be added. This brings the total
   guideway costs, exclusive of the bus component capital costs of $213
   million, to $2,463 million. With the bus component added, the total
   is $2,666 million. (Tables 6.5 and 6.3. Bus costs in 1991 dollars.)

4. Financing Plan

   The proposed financing of some 70% of the system's capital costs
   through a 1% excise tax increase, to be offset by State income tax
   credits, was intended to make the financial plan sound painless. That
   the public has seen through this smoke and mirrors approach is evident
   in the increasingly unfavorable sentiment revealed by successive polls
   and the votes of various Neighborhood Boards and other community orga-
   nizations having no financial, professional, business or political
   interests in the scheme.

   a. The SDEIS, in Table 6.5 outlines a ten year Financial Plan ex-
      pressed in year-of-expenditure dollars based on a 6.9% annual increase
      in Excise Tax revenues, a 4% annual escalation in costs and prices.
      Again, we cannot substitute our projections for the City's, but it
      should be noted that although, at present, the 1% surcharge would
      amount to about $100 million a year, the Financial Plan assumes an
      annual average take of $172 million, rising as high as $224 million
      by 2002. The current recession already has brought this optimistic
      forecast into question.

   b. It is generally agreed that between 25% and 30% of the GET is paid
      by tourists, either directly or indirectly. This would leave an average
      of about $120 million a year to be paid by Oahu's taxpayers, both at
      the retail level and in increased prices passed along to them by busi-
      nesses taxed at various points in the manufacturing and distribution
      chain.

      A 1% tax yielding $120 million a year would have to be based on
      total goods and services amounting to $24 billion - an average of some
      $80,000 in taxable goods and services for each Oahu household. (This
      excludes an estimated $10 billion in annual taxable purchases by visitors,
      yielding, at 1%, $50 million a year.) We do not pretend to be tax ex-
      perts, but we are reasonably certain that the average Oahu household
      will not be spending anything like $80,000 a year on GET - taxable
goods and services in the 10 year period beginning in 1993. Is the
Financial Plan based on GET revenues that will not materialize?
c. The regressivity of the GET is acknowledged by almost everyone
who knows anything about it. Though the SDEIS mentions it, there is
no even remotely adequate analysis of its impact on households of
different income levels. Various studies made by such organizations
as the Tax Foundation of Hawaii show that a ½% GET surcharge would
result in a burden of about 2% on a low-income family’s budget, when
both direct and indirect effects are included – several times its
weight on an upscale family’s income.
The SDEIS has a passing reference to the proposed State income
tax credit as partially off-setting this regressivity, which it does
not do. In its original form, the credit was a flat percentage of
adjusted gross income, ranging from a minimum of $18 to a maximum of
$450 – i.e., the rich family received a credit of 25 times as much
as the poor family. (This may since have been changed to range from
$25 to $280 – not much of an improvement.)
d. In the fall of 1991 the City claimed that the net cost of the
GET surcharge, as offset by the tax credit, would range from $4 a year
for a household with an adjusted gross household income of $27,732 to
$15 a year for a $100,008 income household. We made our own analysis,
of which we append a copy. It was based upon the City’s Financial Plan
figures before the public as of 10/3/91, which have since been altered
a little as a result of lowering the assumed rate of annual growth in
the anticipated GET, but the over-all picture we present is not changed
to any significant extent. We think that an analysis of this kind,
broken down further by income level, should be a part of the SDEIS
as a basic part of its impact analysis.
Please consider the attached analysis as part of our current
comments.

e. We find no analysis in the SDEIS of the impact on the ability of
the State and City to fund other public facilities and services –
education, health, housing, sewerage, water, streets, welfare, etc. –
of the approximately $160 million annual increase in annualized capital
and O & M costs shown for rail over and above comparable TSH costs.
The State is facing $350 million less in state revenues this year than
anticipated. The annual income tax credit to be paid for 17 years at
$53 million (or more) per year represents a loss in State income of at
least $900 million.

As indicated above, the GET surcharge may bring in less than hoped
for, and in any case the City will have to significantly increase its
subsidies for transit, if rail is built. The SDEIS makes no meaning-
ful analysis of the impacts of the rail system on the provision by
either State or City of other necessary public services, which we –
evidently most Oahu citizens – feel should have greater priority.

Very sincerely yours,
Arlene Kim Ellis, President
Astrid Monson, Chair
Planning & Zoning Committee
Mr. Benjamin B. Lee, Chief Planning Officer  
Department of General Planning  
City and County of Honolulu  
650 South King Street, 8th Floor  
Honolulu, Hawaii 96813

Mr. Amar Sappal, Project Manager  
Department of Transportation Services, RIDD  
City and County of Honolulu  
650 South King Street, Third Floor  
Honolulu, Hawaii 96813

Gentlemen:

Thank you for the opportunity to comment on the MA-DEIS for the Honolulu RIDD project. We submitted testimony at the May 8 public hearing, but limited it to criticisms of the MA-DEIS itself and what we considered shortcomings in the way the alternatives were formulated and presented, rather than to an evaluation of the alternatives themselves. We are now summarizing that statement and adding our comments on the three main options -- no-build, TSM-bus, or rail, and also the alternative preferred by the League after six months of study, several membership meetings and returns to a questionnaire distributed to our entire membership.

At a meeting May 18, we concluded, with about 80% concurrence, that we cannot support any of the rail alternatives; that the no-build option is unacceptable in view of the island's growing traffic and transit problems; and that we must therefore choose the TSM-bus alternative as the only viable basis for future action. This is in spite of the fact that we think that as structured in the MA-DEIS, it over-emphasizes simply adding more buses but does not include, so far as we could determine from the scanty description given in the MA-DEIS, consideration of such additional measures as would develop a true "bus rapid transit" system giving priority and precedence to transit vehicles over private automobiles, such as bus lanes in congested locations, selected grade separations at key intersections on bus routes, possibly a short bus subway downtown, and various para-transit programs to encourage private as well as public provision of mini-buses, vans, computerized ride-sharing, etc.

Such a system, we believe, could attract enough additional riders to narrow or close the gap -- 25,000 daily rides as now projected between TSM-bus and the average of the six full-length rail alternatives, or 17,000 compared with the average of the three RDS options -- at a capital cost not necessarily higher than that projected for the TSM-bus as now structured, but certainly far lower than for a rail system.

Though we must question some of the projections in the MA-DEIS for such items as ridership, we are in no position to dispute their premises or methodology or develop what we might consider more realistic ones. We therefore are listing our comments on the data and projections of the MA-DEIS.

May 22, 1990
1. The lay public, in something like 55 days, cannot adequately analyze the complex results of years of work by professional planners and engineers at the cost of millions of tax dollars. Like many documents of its kind, the AA-DEIS essentially presents data and arguments in support of what its contracting agency is proposing, and gives only cursory treatment to the alternatives not favored. We do, however, find it to be more objective and credible than its ten-year old predecessor, the AA-EIS prepared for the Honolulu Area Rapid Transit (HART) proposal.

2. To whatever extent the current AA-DEIS may -- consciously or unconsciously -- appear to favor the rail alternatives, a careful study of the data and projections presented does not, in our opinion, lead to the conclusion that rail would be the preferred course of action for Honolulu at this time.

3. Many of the important criteria and factors needed to evaluate the alternatives are not easily found in the report, except by ploughing through many pages of text, tables, and graphics. An index would have been helpful. The Executive Summary does not include such comparative data for the alternatives as the projected number of rail-gateway users, or the total annualized cost -- for capital as well as maintenance and operations -- of each option. (We note that the rail ridership projections have now been added in the current Transit News Letter #4 dated April, 1990.)

4. We also must question the structure of the alternatives presented, though we are told that these had to follow Federal guidelines rather than reality. The no-build projections show an increase by 2005 of only 2.6% from the current level of bus ridership shown in the AA-DEIS -- actually they show a decrease from the usual current ridership counts, after allowance for transfers, which are found in various official publications. The AA-DEIS shows a decrease in relative daily bus ridership from the current level of 26 per 100 population to 29 in 2005 -- said to be due to poorer bus service caused by greater traffic congestion. This is said to be in spite of inclusion in the no-build alternative of a $150 million worth of highway improvements, the re-assignment of bus routes better to meet the demand, additional park-and-ride and maintenance facilities, etc. How will it benefit people to use their cars rather than the bus if they have to cope with this same congestion?

5. The TSH-bus alternative, on the other hand, is made to show so great an increase in the number of buses required, and hence in operating and maintenance costs as well as capital costs, as to put it in an unfavorable light in comparison with rail. It shows an increase of 110% in the number of buses, and of 133% in capital costs, over no-build, to produce a 19.2% increase in riders. In fact, riders only increase 22.3% over their present volume. These projections are in spite of the expenditure of $33 million for new buses, maximum TSH improvements, park-and-ride facilities, etc. Does the TSH alternative, as structured, make any sense except as a straw man to be knocked down by rail?

6. In spite of this, daily total 2005 transit ridership, with rail, is projected from data in the AA-DEIS to be only 25,000 more than with TSH-bus. Even assuming for now that the entire reduction is in peak periods, we are talking about only 10,000 fewer cars on the road in each peak period -- about 4% of 1985 Census totals for cars used between home and work all day, and an even smaller percent in 2005.

7. Total automobile vehicle miles traveled in 2005 show similar small reductions with a rail system in place from what they would be with TSH-bus, even when the can the environmental, health, energy and other benefits of rail be meaningful with such insignificant reductions in automobile usage?
Evaluation of No-Build, TSM-Bus, Rail

As suggested in the April 1990 ART News Letter 64, we will group our discussion of alternatives under the six "Evaluation Measures" listed therein. Our studies did not include an evaluation as between rail alternatives, but only as between no-build, TSM-bus, and rail generally, though for some purposes we split rail into the full-length and the NOS options, each as a group.

1. Costs

We believe that the costs of a rail system need to be looked at not only in absolute terms but also in relation to who and how many will benefit from it and who and how many will pay how much for it. We have concluded that the projected high capital costs of rail, even when combined with its slightly lower operating costs, cannot be justified by the limited increase in total transit ridership shown in the AA-DEIS as compared with the TSM-bus alternative. We attach a data sheet used in our studies, which shows the following in relation to costs:

<table>
<thead>
<tr>
<th>Compared with TSM-Bus Alternative</th>
<th>Full-length Rail</th>
<th>Short (NOS) Rail</th>
</tr>
</thead>
<tbody>
<tr>
<td>Increase in annualized capital costs</td>
<td>250.5%</td>
<td>155.0%</td>
</tr>
<tr>
<td>Decrease in annualized O &amp; M costs</td>
<td>- 6.9%</td>
<td>- 9.6%</td>
</tr>
<tr>
<td>Increase in annualized total costs</td>
<td>63.0%</td>
<td>35.3%</td>
</tr>
<tr>
<td>Increase, average cost per ride, over-all</td>
<td>46.9%</td>
<td>27.7%</td>
</tr>
</tbody>
</table>

A full-length rail system would have to attract 374,500 daily riders -- 120,000 or 47.1% more than projected -- to bring its average cost per ride down to what line 17 shows for TSM-bus. The relationship between costs and other evaluation measures will be discussed below.

2. Transportation Impacts

The high costs of a rail system could still be justified, we believe, if the resulting reduction in automobile traffic were enough materially to affect highway traffic congestion or if greatly increased transit ridership resulted. But the AA-DEIS does not show either of these to be the case. Again, from the attached study table, the following can be seen: (Headings as above)

| Increase in total transit trips | 10.9%          | 7.4%           |
| Transit trips as a percent of total daily trips | 8.49%          | 8.22%          |
| Increase in this ratio in percentage points over TSM-bus's 7.65% | 0.84           | 0.57           |
| Rail guideway trips as percent of total trips | 5.43%          | 4.29%          |
| Increase in transit trips to & from downtown (from line 7) | 8.6%           | 5.6%           |
| Decrease in total auto vehicle miles | 4.2%           | NA             |
Compared with TSM-Bus Alternative

<table>
<thead>
<tr>
<th>Full-length rail</th>
<th>Short (HDS) Rail</th>
</tr>
</thead>
<tbody>
<tr>
<td>Decrease in total vehicle miles, adjusting for buses</td>
<td>3.1%</td>
</tr>
<tr>
<td>Decrease in transit time per trip</td>
<td>0.1 min.</td>
</tr>
<tr>
<td>Decrease in highway travel time per trip</td>
<td>1.2 min.</td>
</tr>
<tr>
<td>Weighted average decrease, all trips (from lines 2 and 3)</td>
<td>1.0 min.</td>
</tr>
</tbody>
</table>

We note that the transit time decreases projected in the AA-DEIS for rail are predicated on two-minute train headways, which in turn are based on the high rail ridership projected. As this is several-fold the ridership ratio in other cities such as Vancouver and might be significantly reduced if higher fares were instituted to increase the proportion of costs covered by the fare-box, longer intervals between trains might be necessary and would reduce the projected time savings.

3. Environmental Impacts

We have not been able, in the time available, to review the details of most of the environmental factors discussed in the AA-DEIS, but we have a few comments to make on selected points:

a. Air Pollution

From the attached table, line 11, only minimal air pollution impacts are shown as cited in the AA-DEIS, p. 5-40, between TSM-bus and rail. This could hardly have been otherwise in view of the small decreases shown on line 8 for vehicle mileage. Even with the considerable decrease in bus mileage projected for the rail alternatives, as shown on p. 5-28 of the AA-DEIS, the over-all decrease in pollution is insignificant. The use of electric buses, which we have long advocated, could cut road pollution, though if dependent upon fossil fuel for power generation, may not reduce island-wide pollution.

Our analysis revealed the following from the attached table, Line 11 (Headings as above):

| Decrease in C.O. | 1.0 percentage points | NA |
| Decrease in NO | 1.2 | NA |
| Decrease in NOX | 2.2 | NA |
| Decrease in NH | 5.2 | NA |
| Decrease in SO | 5.2 | NA |

a/ Adjusting for decrease in bus miles by equating impact of one bus on the road to the impact of six automobiles

b/ AA-DEIS, p. 6-24, average of respective alternative groups

c/ HALL 2000, Table 6-5. 41.15 min. for TSM-bus, 39.95 min. for rail by averaging light and heavy rail.
b. Noise

Experience with noise impacts in Vancouver reported by several of our members -- a system said to be a model for Honolulu -- leads us to have great concern, particularly because many of the alternative routes proposed would affect densely populated areas. "Mitigation" is always possible but not always very effective, and baffles can be aesthetically unsightly.

C. Growth Impacts

Development around stations and adjacent to the guideway route, particularly if encouraged by the kinds of height and density zoning concessions proposed for the privately financed Convention Center and often mentioned in connection with rail could, we feel, have a seriously negative impact on the neighborhoods affected. Combined with large numbers of buses and automobiles converging on the stations and increased numbers of pedestrians entering and leaving or shopping or working in the development focused around them, these could be a real problem, particularly since park-and-ride facilities and even bus loading areas at the stations may not be possible in many areas.

d. Aesthetics

The unfavorable impact of the elevated structures proposed needs no comment from us, other than to refer to the drawings on pp. 5-72, 5-78, 5-79, 5-89, etc., of the AA-DEIS. It is worth noting that the Downtown Improvement Association complains in a current issue of the "Downtown" that elevated routes downtown "are visually and environmentally damaging....have structures which will reduce street capacity and cause traffic congestion." While we agree, we must point out that the same criticisms apply to the remaining sections of the routes.

4. Financial and Institutional Feasibility

There is considerable confusion as to the financing measures now being considered as meeting UMMA's requirements. The AA-DEIS shows two alternative possibilities with respect to an excise tax -- 1% for 5 years or ½ % in perpetuity -- both to finance construction capital costs only (p. S-40). These differ from what the Legislature adopted last month, and indeed in response to UMMA-CAC questions, the City replied that "a perpetual ½ % excise tax surcharge that would be used for both capital and O & M costs was considered in the AA-DEIS, but this option would likely not be pursued by the City." (UMM-CAC, April 25, 1990, p. 19).

Be that as it may, and whatever smoke and mirrors are used, we are talking about a capital cost for a rail system of about $5,000 per average Oahu household, and an annual deficit, above face-box revenues, for debt service and O & M, of about $750 per household, at present cost projections. A ½ % excise tax surcharge would raise about $275 per household per year, of which perhaps $75 could be extracted from tourists. The so-called surcharge credit just adopted would return an average of $175 per average household, ranging from $15 for very low-income families to $400 or more for those with incomes approximating $100,000 or more. (We will discuss this further under the section on Equity.)

The AA-DEIS and the City have suggested many other revenue sources to supplement the scant ½% of total costs projected to be derived from fares at present levels. Many of these assume complicated arrangements with private developers or investors which may or may not materialize, especially in view of the losses most new rail
systems are experiencing. Pressures to increase fares to two or three times the present level can be expected, but at best they would still bring in only 20% or 30% of total costs, and such increases would in all likelihood reduce ridership significantly.

The various short-falls indicated in the AA-DEIS are staggering. Were they to be met out of either existing or augmented public revenue sources, especially if debt service on bonds is involved, we fear that this would so strap future city -- and perhaps State -- budgets as to require retrenchment in virtually all other public services and facilities, including schools, health care, housing, infrastructure, etc.

In our opinion the question is not whether we can fund a rail system, but whether we should. In view of the costs and the only marginal benefits shown in the AA-DEIS and indicated above, we think that the answer has to be "No, not at this time -- perhaps in two or three decades, if the population and transit use grow enough to sustain it." It should be remembered that the often-repeated argument that it is better to build now, before prices go up, does not take into account the opportunity costs of the money prematurely spent nor the sacrifice of future technological advances. Already it is generally admitted that to have built HART ten years ago would have been a grave mistake.

5. Cost Effectiveness

On the attached table we show on line 16 the Cost Effectiveness Index for the two groups of rail systems. In addition, we have calculated a CEI -- using, as far as possible, the same method as in the AA-DEIS -- comparing TSM-bus and rail with no-build. Factor in the value of time savings, we used Tables 6-12, 6-13 and 6-18. We found the following:

<table>
<thead>
<tr>
<th>Compared with TSM-bus Alternative</th>
</tr>
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<tbody>
<tr>
<td></td>
</tr>
<tr>
<td><strong>Full-length Rail</strong></td>
</tr>
<tr>
<td>Increase in cost per new rider per ride (from line 16)</td>
</tr>
<tr>
<td>Increase in average cost per ride over-all (from line 17)</td>
</tr>
</tbody>
</table>

These comparisons would, we believe, have been even more striking if, as we indicated previously in these comments, a TSM-bus alternative had been structured more realistically and with a less excessive outlay for new buses. Be that as it may, our attached table also shows the following:

<table>
<thead>
<tr>
<th>Compared with No-build Alternative</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td><strong>TSM-bus</strong></td>
</tr>
<tr>
<td>Increase in transit ridership (from line 3)</td>
</tr>
<tr>
<td>Increase in capital costs (from line 13)</td>
</tr>
<tr>
<td>Increase in annualized O &amp; M costs (from line 14)</td>
</tr>
<tr>
<td>Increase in total annualized costs (from line 15)</td>
</tr>
<tr>
<td>Ratio of increase in total annualized costs to increase in ridership (from above)</td>
</tr>
<tr>
<td>Increase in average cost per ride over-all (from line 17)</td>
</tr>
</tbody>
</table>
### Cost-Effectiveness Index

<table>
<thead>
<tr>
<th>Compared with No-build Alternative</th>
</tr>
</thead>
<tbody>
<tr>
<td>TSM-Bus</td>
</tr>
<tr>
<td>$4.10</td>
</tr>
</tbody>
</table>

From all the above, we conclude that even as structured, the TSM-Bus alternative is more cost-effective than either group of rail alternatives.

6. Equity

If fares remain at present levels, as assumed in the AADBEIS, both the TSM-Bus and the rail alternatives are projected to increase ridership from low-income areas. This is consonant with the findings of the 1980 Census, which showed home-to-work transit ridership ratios from central, lower-income areas at up to five times the ratio to all home-to-work trips found in outlying, more affluent areas.

With a uniform fare structure, this involves considerably higher fares per mile for lower-income transit users. We are not necessarily arguing for zoned fares, as we have not studied the issue, but only point this discrepancy out as a fact of life.

More important, however, in our opinion, is the question of the distribution of costs. As was noted above and on line 4 of the attached table, the AADBEIS projects 63,000 trips fully or partially by rail in 2005 with the full-length rail alternatives and 128,600 with the NOS alternatives. Ordinarily, a person uses the same travel mode both ways for any given trip; some persons use a mode for more than one round trip; and tourists, at even one round trip by transit per visit, comprise between 10% and 15% of daily transit users. We can estimate that up to 70,000 Oahu residents out of the year 2005 projected population of 975,000, or 7.1% of the total, would be using rail on any given day. Even eliminating children, we are talking about less than 15% of the adult population. With the NOS alternatives, the proportion is even lower.

Yet, to the extent that tax revenues of one kind or another have to be used to finance the system, every one has to pay for it. This is true of Federal funds, too -- often forgotten when we speak of "the Feds" picking up 30% of the costs. It is often argued that this is also true of schools, for which all of us are taxed whether we have children attending them or not. This is as it should be, but the vast majority of us have attended public schools at some time or have children who have done so. Moreover, the very survival of society depends on education of its young.

A further inequity must be mentioned. All knowledgeable tax policy students agree that an excise tax is extremely regressive, in that a far larger proportion of the income of poor families -- indeed, almost all of it -- is subject to this tax, whereas wealthy families only spend a small portion of their income for basic necessities and, as home owners, pay no tax on rent, thus spending a much smaller proportion of their total income in the form of an excise tax.

Furthermore, many kinds of businesses either pay no excise tax at all or are given at 5% instead of 4% and, according to the legislation just passed, would not be subject to the 5% surcharge levied on the kinds of consumption goods poorer families have to buy. All of this means that the surcharge will take a considerably higher bite out of a poor family's budget than of an affluent family's.
The surcharge credit recently enacted only makes this regressive situation worse. Unlike the present tax credit, which is higher for lower income families and phases out above $30,000, the transit credit is levied as a straight percentage of income. It rebates $18 to the $5,000 family, $36 at $10,000, $72 at $20,000, and up to $300 at $100,000 and as high as $450 at $125,000 or more.

An analysis of San Francisco's BART (Bay Area Rapid Transit) system some years ago concluded that "clearly, the poor are paying and the rich are riding". Will history repeat itself in Honolulu?

6. Significant Trade-Offs Between Alternatives

As was stated above, we have made no analysis as between the various rail alternatives, but only as between no-build, TSM-bus, and rail generally. We concluded that No-build solves nothing, so primarily we looked at TSM-bus as an alternative to rail. We did not find that its marginal benefits in ridership, travel time savings, decreases in traffic congestion, and operating costs were anything like an adequate trade-off for the costs, aesthetic disadvantages, and inconveniences ...(during construction and when in operation) associated with rail.

We therefore cannot support any of the rail alternatives and opt for TSM-bus as the basis of the locally preferred alternative. Hopefully, the system actually undertaken could be implemented gradually and with modifications as dictated by experience with it, and would be combined with additional measures, as suggested above, to transform it, in not too many years, into a genuine "bus rapid transit" system which will give the community benefits at least comparable to rail, and at a more reasonable and tolerable cost.

Thank you for the opportunity to comment on this most important planning and financial decision for our community.

Astrid Monson, Chair
Planning and Zoning Committee

Patricia Thomas, Chair
Transit Task Force

Arlene Kim Ellis, President
## KEY DATA AND PROJECTIONS FOR ANALYSIS OF TRANSIT ALTERNATIVES

<table>
<thead>
<tr>
<th>Present</th>
<th>MA-DEIS Alternatives, 2005 projections</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#1</td>
</tr>
<tr>
<td></td>
<td>(no-build)</td>
</tr>
<tr>
<td>1. Oahu population</td>
<td>855,000</td>
</tr>
<tr>
<td>2. Total Oahu daily trips, all modes</td>
<td>2,600,000</td>
</tr>
<tr>
<td>3. Transit trips, week-day average</td>
<td>220,000</td>
</tr>
<tr>
<td>(See below) 1986</td>
<td>187,700</td>
</tr>
<tr>
<td>4. Rail guidedway trips, OHA</td>
<td>192,600</td>
</tr>
<tr>
<td>5. Trips by bus only, OHA</td>
<td>229,600</td>
</tr>
<tr>
<td>6. Increase, rail over TSW-bus trips</td>
<td>25,000</td>
</tr>
<tr>
<td>7. Transit trips (and from)</td>
<td>32,600</td>
</tr>
<tr>
<td>downtown, OHA</td>
<td>9,196,800</td>
</tr>
<tr>
<td>8. Average minutes saved per rail trip over TSW-bus</td>
<td>8.1</td>
</tr>
<tr>
<td>9. Average highway travel time per car trip, minutes</td>
<td>40.45</td>
</tr>
<tr>
<td>10. Change (%) in pollution compared to no-build</td>
<td>0</td>
</tr>
<tr>
<td>CO</td>
<td>-1.1</td>
</tr>
<tr>
<td>HC</td>
<td>-0.2</td>
</tr>
<tr>
<td>NOx</td>
<td>+0.7</td>
</tr>
<tr>
<td>PM</td>
<td>+2.5</td>
</tr>
<tr>
<td>12. Total capital costs (1988 $ million)</td>
<td>151.2</td>
</tr>
<tr>
<td>13. Annualized capital costs</td>
<td>17.4</td>
</tr>
<tr>
<td>14. Annualized operating and maintenance costs</td>
<td>64.5</td>
</tr>
<tr>
<td>15. Annualized total costs</td>
<td>70.0</td>
</tr>
<tr>
<td>16. Cost Effectiveness Index - Cost per new rider per ride (See below)</td>
<td>$4.0</td>
</tr>
<tr>
<td>17. Average cost per ride, over-all</td>
<td>$1.03</td>
</tr>
</tbody>
</table>

**Sources and explanations:**

1. 2005 projection from Oahu General Plan.
3. 1989 from Department of Transportation; 1986 from MA-DEIS, p. 4-12, 2005 from MA-DEIS, p. S-31, average of six full rail and three short alternatives.
5. Line 3 minus line 2.
6. From line 3.
10. Oahu Metropolitan Planning Organization, Hull 2000. Rail figure is average with light rail (40.45 min.) and heavy rail (39.45).
12. through 15. MA-DEIS, p. S-20. All costs in 1988 dollars except "present" are as shown in annual DIS reports for 1989.
13. MA-DEIS, p. S-31 for rail compared to TSW-bus. TSW-bus only calculated compared to no-build, using same method.

League of Women Voters, prepared for 5/18/90 meeting by Astrid Inneson, chair, P & R.
THE LEAGUE
OF WOMEN VOTERS OF HONOLULU

TESTIMONY FOR PUBLIC HEARING ON ALTERNATIVE ANALYSIS AND DRAFT
ENVIRONMENTAL IMPACT STATEMENT FOR THE HONOLULU RAPID TRANSIT
DEVELOPMENT PROJECT, MAY 8, 1990, HAWAII STATE CAPITOL

My name is Arlene Kim Ellis and I am President of the League of
Women Voters of Honolulu.

We are still reviewing the AA-DEIS and will submit a more detailed
statement before the May 23 deadline, though we have requested a reason-
able extension so that groups like Neighborhood Boards will be able to
make more detailed studies than is possible in the time now allotted.

Today we are only summarizing some of our major questions.
Generally we are confining our statements to what we think are short-
comings in the way the alternatives are presented, rather than the pros
and cons of the alternatives themselves. We are also confining our
comments to the three major alternatives -- no-build, TSM-bus, and rail,
and not to the differences between rail alternatives.

1. Why is the draft organized in such a way that the public can-
not easily find much of the basic information it needs in order to
understand and weigh the differences between alternatives? For example,
ridership projections in earlier drafts of the project proposal
were deleted from the Summary Table (p. S-31) and can only be found,
for each alternative, by plowing through over 200 pages of the draft's
320, and computing them from Tables 4.10 through 4.18. Why were these
taken out of the summary?

2. Similarly, a basic cost comparison -- the total combined
annualized capital and annual operating and maintenance costs for each
alternative, requires the public to search through 300 pages, almost
to the end of the document. Why could not these, too, have been up
front in the summary table or elsewhere?

3. The AA-DEIS is supposed to be even-handed in its analysis of
the alternatives and not to favor one over the other. Why, then, is
the vast majority of the draft's discussions confined to the rail
alternatives, with only a cursory treatment of no-build and TSM-bus?
Why are there no maps of bus routes?
4. The Cost Effectiveness Index (CEI) is said to be an important factor in weighing alternatives. In the AA-DEIS it is shown (Table 6.18) only for the rail alternatives compared with TSM-bus. Why was it not also computed for TSM-bus compared with no-build? Using the same methodology and pro-rating the value of time savings from Tables 6.12 and 6.13, we found that the C.E.I. of the TSM-bus alternative compared with no-build would be $4.10 per new ride -- lower than any rail alternative, whether calculated from either no-build or TSM-bus, and including even the cheapest and shortest rail alternative. Why was there no consideration of the TSM-bus alternative's C.E.I.?

5. We have questions about both the rail ridership and total transit ridership projections. As to rail, the 163,000 daily rail trips in 2005 would be a ratio of 16.7 per 100 population, compared with 1.9 in Baltimore, 1.2 in Miami, 1.2 in Sacramento, 1.3 in Pittsburgh, 1.5 in Portland, etc., all with populations far higher than Oahu's. Even in Vancouver, with a population nearly twice ours and a rail system comparable to what is planned here, the rate is only 5.0. Even allowing for Honolulu's high bus ridership and particular geography, is such a discrepancy credible, or are we seeing, as in so many other cities which have recently built rail systems, projections three times what actual ridership turns out to be?

6. Going to total transit ridership, the no-build projection for 2005 shows only 4,900 more bus patrons than in 1986 -- an increase of 2.6% -- though the population growth projected in our General Plan is 150,000 from that date to 2005, or 18%. This small transit growth would be in spite of extensive highway improvements already in the pipeline which would cost over $150 million. The AA-DEIS indicates that is because in peak periods "the buses would be traveling at lower speeds on increasingly congested streets...and thus providing poorer service." This may be true, but how would people benefit by abandoning the bus and driving their cars through these same congested streets? Is this another example of loading the dice in favor of rail, particularly since the AA-DEIS projects a decrease of only 1% or 2% in automobile traffic volumes if rail is built?

7. Similarly, is not the TSM-bus alternative structured to show an unrealistic increase in the number of buses and also in capital costs and O & M costs? Again, these tend to exaggerate rail's advantages over this alternative. We should also point out that TSM-best bus
does not include some of the measures commonly mentioned for "rapid bus transit" systems, such as exclusive bus lanes, integration with para-transit modes like 12- or 15-passenger vans, road-pricing or metering, etc., which are designed to reduce automobile traffic and help buses move better. Could not a TSM-bus alternative have been structured this way, creating a better comparison with rail? And what about quiet, efficient, economical electric articulated buses?

8. Some of the premises underlying the alternatives seem to us to be questionable. For example, the average trip time projected to be saved with rail as against TSM—best bus is about 8 minutes. Assuming that this correctly allowed for walking, transfer and waiting time, it is not still a flawed comparison since buses stop every block or two whereas rail stops every half or three-quarter mile? How would the respective travel times have changed if bus stops were at comparable distances to rail? And assuming rail times were based on two-minute intervals, how much would rail travel time's advantage have been lessened if the interval were more realistic -- say, four or five minutes, especially if ridership is lower than projected, as in many other cities?

9. The present fare structure, on which ridership projections were based, produces an average fare per ride of $.25 to .30. If the costs of building rail result in fares typical of other cities in the $1.00 to $1.50 range, how will this affect ridership? Since such increases are more likely with rail than without it, would not ridership be affected more adversely under the rail alternative than the TSM-no build, assuming a constant revenue-to-cost ratio?

These are just a few of our questions about the way the alternatives are structured and analyzed. Short-changing the non-rail alternatives does a disservice not only to the public but to the credibility of the rail alternative itself. We urge that this be addressed in the final AA-DEIS so that the public can make an intelligent decision on this vital matter -- whether to go for no-build, TSM-bus, or rail -- on the basis of unbiased and intelligible data.

Thank you.
May 7, 1992

The Honorable John Waihee
Governor, State of Hawaii
c/o Office of Environmental Quality Control
220 South King Street Fourth Floor
Honolulu, Hawaii 96813

Dear Governor Waihee:

In our submittal to you of our comments on the Supplementary Draft Environmental Impact Statement for the proposed Honolulu Rapid Transit Program on May 6, 1992, we inadvertently omitted our analysis of the impact of the ½% General Excise Tax Surcharge on Oahu households. We refer to this analysis on page 6, d. of our comments.

Please include the enclosure to our comments.

Thank you.

Sincerely,

Arlene Kim Ellis
President
GENERAL EXCISE TAX SURCHARGE

The City administration and the media keep repeating the claim that through a State income tax credit in exchange for raising the General Excise tax by 1%, the $2 billion dollar rail system will cost Oahu households only $4 to $15 each per year for ten years.

We have analyzed this claim and attach our report, which concludes that the actual average amount will be $408 per household, or $4,080 in ten years. As part of our analysis we enclose a summary table showing that the City now expects the construction cost of the rail system (in year-of-expenditure dollars), excluding the Waikiki segment and the Hotel Street subway, to be $2.247 billion. Of this, $1.864 billion would be paid for by the 1% surcharge.

There are three principal reasons for the difference between our estimate of the burden on an average household and the City's:

1) The excise tax is paid not only at the retail level but by manufacturing, wholesale, service and other business establishments as well. Since they get no State tax credit, they pass the added costs on to their customers, thus increasing prices all along the line.

2) Though tourists pay a share of the added tax at both retail and other levels, the proportion is between one-fourth and one-third -- the balance is paid by residents either directly at the grocery store or in higher prices.

3) The tax credit itself has to be factored in. As the State Legislature's 1990 Joint Conference Committee Report No. 163 says, "The county government establishing the surcharge will receive the revenue, while the State will pay out the credit from State revenues." Whether these come out of the General Fund, are borrowed, or reduce resources available for education, housing, health, etc., the money comes out of our taxes one way or the other.

Our attached analysis explains all our computations, which are based on the two tables in the report.

We think it is high time, as public hearings are being held on the proposed Development Agreement between the City and the State, for the City to stop trying to fool the citizens into believing that they can get something for nothing.

Astrid Monson, Chair
Transit Study Committee
THE LEAGUE OF WOMEN VOTERS OF HONOLULU

ANALYSIS OF IMPACT OF ½ % EXCISE TAX SURCHARGE ON OAHU HOUSEHOLDS, 1993-2002

Though the information available to the public is far from complete, we have been able to construct a roughly accurate picture of the subject. We conclude that the net impact of the surcharge is $408 per household per year for ten years rather than the $4 to $15 alleged by the City and State.

Our calculations are as follows and are self-explanatory.

1. We have prepared a ten-year summary table from Attachment 2, Schedule B, to the proposed Development Agreement submitted to the City Council 10/3/91, which is attached. Note that these are indicated by the City to be year-of-expenditure amounts at an annual 4% escalation rate.

2. The total funding from the Surcharge tax for 1993-2002 is calculated at $1,864.86 million (line 2). Total capital funding, excluding proceeds of bonds and notes, is $2,628.90 million. Total capital costs, including debt service, are $2,247.20 million (line 22.) The latter include $2,066.78 million for capital costs (line 17) plus $180.42 million on bonds and notes (line 20 less line 9.) Cash surplus at end of period is $381.73 million.

3. The average annual revenue from the surcharge tax is therefore $186.5 million.
   (Note that this includes inflation and is therefore roughly equal to mid-year 1997.)

4. Current tourist expenditures are $5.4 billion a year (Tax Foundation). ½ of 1% of this is $27 million. Increased by 4% a year for inflation and another 4% a year for growth in tourism would bring this to $45 million in 1977 -- less than 25% of the total tax surcharge of $186.5 million.

5. The balance, averaging $141.5 million a year, would have to be paid by local residents and businesses. The latter get no tax rebate and presumably pass the increase on to their customers in the form of higher prices.

6. We also attach a table from the State Department of Taxation that the net tax increase per year would range from $4 to 15 per household, with the average income household paying $6, which we escalate to $6 by 1997. The tax increase, also inflated to 1997, would be $207 per household and the tax credit, $199.

7. Assuming approximately 300,000 households in 1997, the total tax surcharge would be $62.1 million per year; the tax credit, $59.7 million; and the net surcharge, $2.4 million.

8. We then have the following annual averages:
Tax surcharge revenue, total  
Oahu Total: $186.5 million  
Per household: $622

<table>
<thead>
<tr>
<th>Description</th>
<th>Oahu Total</th>
<th>Per household</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paid by tourists</td>
<td>45</td>
<td>150</td>
</tr>
<tr>
<td>From tax rebate</td>
<td>59.7</td>
<td>199</td>
</tr>
<tr>
<td>Net surcharge</td>
<td>81.8</td>
<td>273</td>
</tr>
<tr>
<td>Paid by residents</td>
<td>2.4</td>
<td>8</td>
</tr>
<tr>
<td>Paid by businesses</td>
<td>79.4</td>
<td>265</td>
</tr>
<tr>
<td>Assume 24% recouped from tourists</td>
<td>19.1</td>
<td>64</td>
</tr>
<tr>
<td>76% paid by residents</td>
<td>60.3</td>
<td>201</td>
</tr>
<tr>
<td>Net surcharge paid by residents, total</td>
<td>62.7</td>
<td>209</td>
</tr>
</tbody>
</table>

9. Since, however, the income tax credit itself reduces State income tax revenues and prevents using the money for other purposes or for debt service, it is equivalent to an additional tax paid. Adding it back in, increases the total cost of the surcharge tax to residents to $122.4 million a year ($62.7 plus $59.7), or $408 per household. This amounts to $4,080 in ten years, not $80, as claimed.

10. This does not include the $100 million in State and City funds allocated to capital funding in 1992. Spreading these over the ten-year term would add $10 million a year, or $33 per household per year, to the above totals, giving us a total tax burden of $451 per household per year, or $4,510 for the period.

11. None of these figures include cost over-runs, change orders, under-estimation of costs not included in the main contract (line 11), such as land acquisition, relocation of utilities, and station finish work -- any or all of which could add materially to the total tax burden as calculated above.

12. They ALSO DO NOT INCLUDE Operations and Maintenance costs, nor replacement reserves. Increased fares -- $1.50 has already been mentioned by a responsible City official -- represent an additional burden.

13. Omitted entirely from our analysis is discussion of the regressivity of the General Excise tax, which has been explained in detail by the State Tax Commission and more recently by the Tax Foundation. The State’s table does not go below the $27,732 level, which is about 65% of average income. Very low income families will get a tax credit -- if they use it at all -- of only $18 under the law, which is far less than the tax surcharge will cost them, plus paying increased costs passed on to them by businesses. As has been widely documented, excise taxes take a much larger portion of their income than they do of high-income families, who can get tax rebates of up to $450 under the law.

-- Astrid Monson, Chair  
Transit Study Committee  
10/5/91
### SUMMARY OF RAIL TRANSIT CAPITAL FINANCIAL PLAN

(Schedule B, Phasing Schedule of Anticipated Funding Sources and Costs)

**Millions of Year-of-Expenditure Dollars**

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Federal-UMTA Section 3</td>
<td>615.62</td>
<td>2.26</td>
<td>617.88</td>
</tr>
<tr>
<td>2. City Excise Tax Surcharge</td>
<td>755.21</td>
<td>1109.65</td>
<td>1864.86</td>
</tr>
<tr>
<td>3. State Transit Cap. Dev. Fund</td>
<td>50.00</td>
<td></td>
<td>50.00</td>
</tr>
<tr>
<td>4. City General Funds</td>
<td>50.00</td>
<td></td>
<td>50.00</td>
</tr>
<tr>
<td>5. Interest Income</td>
<td>3.66</td>
<td>42.50</td>
<td>46.16</td>
</tr>
<tr>
<td>6. SUB-TOTAL</td>
<td><strong>1474.49</strong></td>
<td><strong>1154.41</strong></td>
<td><strong>2628.90</strong></td>
</tr>
<tr>
<td>7. Notes Proceeds</td>
<td></td>
<td>12.75</td>
<td>12.75</td>
</tr>
<tr>
<td>8. E.T. Surcharge Bond Proceeds</td>
<td>911.00</td>
<td></td>
<td>911.00</td>
</tr>
<tr>
<td>9. SUB-TOTAL BORROWED</td>
<td>911.00</td>
<td><strong>12.75</strong></td>
<td><strong>923.75</strong></td>
</tr>
<tr>
<td>10. TOTAL</td>
<td><strong>2385.49</strong></td>
<td><strong>1167.16</strong></td>
<td><strong>3552.65</strong></td>
</tr>
</tbody>
</table>

### CAPITAL COSTS

| 11. System Contract                     | 1255.00   |            | 1285.63 |
| 12. Station Contracts                   | 194.40    |            | 194.40  |
| 13. Other Project Costs                 | 359.35    |            | 359.35  |
| 14. Contingency Reserve                 | 141.08    |            | 141.08  |
| 15. Capital Reserve                     | 27.61     | -27.61     |         |
| 16. G.E Tax & Use Tax                   | 84.85     | 1.47       | 86.32   |
| 17. SUB-TOTAL                            | **2062.29** | **4.49**   | **2066.78**|
| 19. Short Term Notes (repaid)           |           | 13.52      | 13.52   |
| 20. SUB-TOTAL REPAYED                   | 321.03    | **783.14** | **1104.17**|
| 21. TOTAL                               | **2383.32** | **787.63** | **3170.95**|
| 22. LESS Borrowed (line 9)              | 1472.32   | 774.88     | 2247.20 |
| 23. ENDING CASH BALANCE                 | 2.18      | 379.55     | 381.73 |
IMPACT OF SURCHARGE TAX AND INCOME TAX CREDITS

Paying for rail transit

Here is how much a rail transit line would cost the average taxpayer:

| Adjusted gross annual household income: | $27,732 | $42,425 | $59,911 | $106,508 |
| ½ percent yearly tax increase: | $104 | $159 | $225 | $377 |
| Tax credit | $100 | $153 | $216 | $362 |
| Net total tax increase per year: | $4 | $6 | $9 | $15 |

Source: State Department of Taxation

From the above table, we calculate as follows for $42,425 adjusted gross household income which will be assumed to be an "average" household.

<table>
<thead>
<tr>
<th>Per Household</th>
<th>300,000 Households (Oahu Total)</th>
</tr>
</thead>
<tbody>
<tr>
<td>½% Tax surcharge</td>
<td>$159</td>
</tr>
<tr>
<td>Tax credit</td>
<td>153</td>
</tr>
<tr>
<td>Net tax increase</td>
<td>6</td>
</tr>
</tbody>
</table>

Ten-year Total at 1997 Average

| ½% Tax surcharge | 1,590 | 2,070 | 477 million | 621 million |
| Tax credit | 1,530 | 1,990 | 459 | 597 |
| Net tax increase | 60 | 80 | 18 | 24 |

1/ Assuming 4% annual inflation
Average for 1993 - 2002
May 7, 1992

Governor John Waihee
State of Hawaii
c/o Office of Environmental Quality Control
220 S. King Street, Fourth Floor
Honolulu, Hawaii 96813

Re: Honolulu Rapid Transit Program

Dear Governor Waihee:

This is to submit our comments on the Supplemental Draft Environmental Impact Statement for the the Rapid Transit project. The two issues being addressed herein relate to Section 4.2 Highway and Parking Impacts and Section 5.5 Air Quality, and are as follows:

1. Sec. 4.2.2 Access to Stations: This section only addresses the intersection of Ala Ike Road and Farrington Highway, to which the TSM Alternative is expected to cause a change from under capacity at No-Build to near capacity with the TSM.

LOTMA is extremely concerned that this section does not address potential traffic impacts of planned roadway accesses to the Waialua Station through the Waialua Interchange, i.e., movements to and from the H-1 and H-2 freeways, Kamehameha and Farrington Highways, Ala Ike Road. This is a particularly significant issue as Table 4.10 reflects the highest volume of arrivals/departures by bus and auto of any station.

Present travel demands on the Waialua Interchange already exceed original design capabilities, which is resulting in less than optimal efficiency of movement. As one example of present conditions, southbound traffic on the Kamehameha Highway overpass is burdened with excessive merging situations caused by traffic exiting the H-1 and H-2 to access Pearl City crossing over traffic heading for the townbound H-1 on-ramp and traffic exiting to Waipahu via Farrington Highway.

For maximum rapid transit ridership from Ewa and Central Oahu, accessibility to the Waialua station is critical and must address the long-range transportation needs of this growing region. Therefore, LOTMA strongly urges a comprehensive and coordinated city/state/federal effort to link all rapid transit and interchange/highway improvements for a functionally effective and balanced transportation system.

Honfed Building • 94-229 Waipahu Depot Road, Suite 407 • Waipahu, Hawaii 96797
Telephone Number (808) 677-2114 • FAX Number (808) 676-4741
Comments on SDEIS
May 6, 1992

2. D. 4-10: The explanation for Table 4.10 (volumes by mode) ends by stating "...total trips on the fixed guideway system would be about 187,400 per day" due to each trip to and from being represented twice. How does this "total trip" figure relate to the 315,400 daily transit trips in Table 4.8.

3. D. 5-32 Air Quality (Table 5.3): It is not clear why 1) the TSM Alternative scores better than rail in the year 2000 and rail scores better than TSM in 2005 and 2) the amounts of emissions in all but 2 pollutants are lower in year 2000 than in 1995. Also, since carbon dioxide is a major greenhouse gas released by motor vehicles, why is it not mentioned in this section?

Thank you for the opportunity to offer comments.

Sincerely,

Darrylyn T. Bunda
Executive Director

cc: Office of Rapid Transit
Attn: Frank J. Doyle

Department of General Planning
Attn: Benjamin B. Lee
April 23, 1992

Mr. Joseph Magaldi, Jr.
Director
Department of Transportation Services
HONOLULU MUNICIPAL BUILDING
650 SOUTH KING STREET
HONOLULU, HAWAII 96813

PUBLIC HEARING STATEMENT: SUPPLEMENTAL DRAFT ENVIRONMENTAL STATEMENT (SDEIS) FOR THE HONOLULU RAPID TRANSIT PROGRAM.

Gentlemen:

As an organization working to preserve the natural environment since 1912, The Outdoor Circle is well aware of the problems created by freeways and automobiles. We have given serious study to this transit program.

Our statement in response to the AA/DEIS chose the "Hotel Street mined tunnel with the portal past Kapilani Boulevard near Cooke Street as the only solution". We also described in detail the loss of many mature trees lining major thoroughfares such as Kapilani, Kalakaua, and Dillingham.

As ever taller developments block Honolulu’s mountain views, it becomes even more important to preserve view corridors in the streets. This, generally 20 to 40 foot aerial structure, would block views to the mountains from many sites. The SDEIS depicts the guideway at an elevation of 70 feet as it crosses over the freeway heading to the University of Hawaii marring the view of the mountains surrounding Manoa Valley.

After full consideration of the current information available on this project, and weighing its potential benefits against the negative impacts, The Outdoor Circle respectively requests that the project not go forth, as presently proposed.

Thank you for this opportunity to express our concern.

Sincerely,

Betty Crocker
President
WAIKIKI RESIDENTS ASSOCIATION

SUITE 34C, 1710 ALA MOANA, HONOLULU, HI 96815  942-3762

April 23, 1992

K. E. W. ORANJUK

TO: Chair 

FROM: The Waikiki Residents Association

SUBJECT: The Honolulu Rapid Transit

Kr Chair, I am Georgia Miller, President of the Waikiki Residents Association, whose boundaries are Atkinson Drive on the west and the Diamond Head Lighthouse on the east.

At a regular monthly meeting of the organization 2 years ago this community association voted NO support for the proposed rapid transit project. Nor has the organization changed its position in the ensuing months. We set up a card table in front of Eaton Square in Waikiki in 1991 and in a few days secured 1000 signatures in protest to the project as proposed. Objections were on the basis of the cost and financing and not enough attention had been given to alternatives to the traffic problems. Alternatives such as HOV lanes, van pools, and other solutions had not been tried.

We also turned in 2779 original signatures on petitions to the Council's Policy and Environment Committee
Rapid Transit Project
April 23, 1992
Page 2

from citizens all over this island on petitions in protest to the rapid transit project.

Therefore, once more the Waikiki Residents Association is registering its opposition to the rail transit proposal as well as a spur line into Waikiki.

Thank you

Georgia Miller
President Waikiki Residents Association
5.0 BUSINESSES
The Honorable John D. Waihee III  
Governor, State of Hawaii  
c/o Office of Environmental Quality Control  
220 S. King St., 4th Floor  
Honolulu, HI 96813  

Dear Governor Waihee:

The Environmental Impact Statement for the Mass Transit System is dated March 1992. To date, no copy of the EIS has been delivered to the Ala Moana Management Office. Comments on this impact statement are required by May 7, 1992; therefore, there is not a possibility of obtaining a copy in Seattle for our review in time to comment by this deadline. However, we would expect that the impacts on the Ala Moana Shopping Center and adjacent property by the Mass Transit System should require a detailed evaluation of the following items:

1. The impact on D/E Hawaii Joint Venture's (owners of Ala Moana Shopping Center and adjacent properties) liability. Also, how and to what extent will ownership be compensated for losses resulting from the construction and impact of this station (outlined below), and how and to what extent ownership will be required to contribute toward the system's development through additional taxes and assessment fees.

2. Foundation requirements for the Mass Transit System and their impact on the foundation strata used for supporting the Ala Moana Center and its currently planned expansion, as well as future expansion and the impact on the other properties along Kapiolani Blvd., including the Ala Moana Office Building and the Ala Moana Pacific Center.

3. Traffic generated in the whole area - and either the increase or decrease in the expected number of vehicles on the streets surrounding Ala Moana.

4. A specific evaluation of the traffic and its impact on Kona Street.
5. The impact vibration and noise from the construction activity on operations on at Ala Moana Center and adjacent properties.

6. The impact on the number of shopper trips generated to and from Ala Moana.

7. The impact on the number of buses that terminate at the shopping center on Kona Street and the transfer of the people to and from the businesses and the Mass Transit and the interchange between the two. The number, frequency and amount of space required for people as well as buses.

8. The impact of the future expansion of the Ala Moana Shopping Center, including the currently planned future expansion of the mall across Kona Street and retail on the mauka side of Kona Street. The impact on the use of the property between Kona and Kapioi for high-rise office buildings as currently zoned.

9. Impact on the current use of both the ground level of Kona Street and the air right in Kona Street, as privately owned property. This would impact the Ala Moana Office Building, Pacific Center, the Watamull Building ramp and the current ramp and parking in Ala Moana Phase II as well as the Phase V ramp and parking in Kona Street. It is our understanding that, D/E retains grandfathered rights to build over the street. We would need clarification on this point, as we are presently being denied permission to utilize our property fully by building over Kona Street. The impact on Ala Moana Center and adjacent properties should the City plan to acquire Kona Street by eminent domain.

10. The impact on utilities in Kona Street, both above and below ground.

11. The impact on the Keeaumoku Street Ramp, which serves both the shopping center and the Ala Moana Office Building.

12. The impact of parking at the shopping center, including such items as the possibility of the parking area of the shopping center being used as a park-and-ride lot.

13. Whether or not, and to what extent ownership will be required to pay assessment fees for the rail station development. How, if any, financial consideration will be given to D/E for losses resulting from disruption of operations, infrastructure damages, restrictions on immediate and future development plans arising from imposed limitations on our property development and easement rights, and encumbrances on our parking facilities.
14. Failure to give notice to the Ala Moana property ownership of the intent and impact of the Mass Transit to use private property on Kona Street for right-of-way and the restrictions and impact of that right-of-way on the use of private property.

It is reasonable to expect that every one of these items would be carefully and in detail evaluated in an EIS. In light of the fact that we never received a copy of this EIS through the appropriate channels, we request that additional time be made available to us to review in more specific detail each of the above items, as well as a thorough review to determine what other impacts need to be considered.

Sincerely,

GENERAL GROWTH MANAGEMENT
OF HAWAII, INC.

[Signature]

Dwight L. Yoshimura
Administrative Director
Ala Moana Center

DLY/bf

cc: Frank Doyle, Office of Rapid Transit
    Benjamin B. Lee, city Department of General Planning
May 4, 1992

Honorable John Waihee
Governor, State of Hawaii
c/o Office of Environmental Quality
220 S. King St., 4th floor
Honolulu, HI 96813

Dear Governor Waihee:

Subject: Comments on the Supplemental Draft Environmental Impact Statement for the Honolulu Rapid Transit Program

My client, Victoria Ward, Limited (Ward), is strongly opposed to the condemnation of privately owned land for private development projects like the Concert Galleria, which has been proposed by the Myers/MK Partners. Like the small property owners who oppose this project, Ward would be devastated by such a taking. Even the threat of such a condemnation has been extremely damaging.

Neither the Alternatives Analysis/Draft Environmental Impact Statement (dated March 1980) nor the Supplemental Draft Environmental Impact Statement (dated March 1982) assesses the detrimental impact of the proposed Concert Galleria project. If the project is not being assessed and its full impact is not being disclosed, then it should be eliminated from further consideration at this time. To keep the option open for future consideration would be blatantly misleading and undermine the purpose and intent of NEPA and Chapter 343, HRS.

We appreciate the opportunity to express these comments. Please feel free to call me if you have any questions.

Sincerely,

Willard T. Chow, Ph.D.

cc: Edward C. Hustace, Victoria Ward, Limited
    Frank J. Doyle, Office of Rapid Transit
    Benjamin B. Lee, Dept. of General Planning
Memorandum

March 30, 1992

Mr. Frank Doyle
Office of Rapid Transit
711 Kapiolani Blvd.
Honolulu, HI 96813

Dear Frank,

Stopping rapid transit would be like stopping the wheels of progress and Downtown Honolulu is a primary hub for that progress. The raucous being generated by mass transit opponents regarding the Nimitz Highway alignment is aimed at bringing Honolulu's continued growth to a screeching halt.

The choice is between an underground tunnel along Hotel Street and an above-ground line along Nimitz Highway. As far as I'm concerned, the obvious choice is along Nimitz Highway. It's where the most traffic can be displaced and it's the site of the Aloha Tower complex. The complex has been (and will continue to be) the proposed site of a major waterfront development. Such a development would naturally lend itself to being a hub station for the train and a gathering place for the movers and shakers in downtown.

Stick with the Nimitz Highway alignment. It's the way to go.

Sincerely,

Sharon Weiner
6.0 PRIVATE CITIZENS
April 1, 1992

Mr. Frank Doyle
Office of Rapid Transit
711 Kapiolani Boulevard
Honolulu, HI 96813

Dear Mr. Doyle:

Newcomers to the frenzy of Downtown Honolulu traffic will tell you it's crazy. It's bad enough between 4:30 and 5:00 p.m., but then Friday arrives! Horrors!

A train near Downtown Honolulu would reduce this frenzy significantly. It would also get people to take up walking again. But where to put it? Some want it along Nimitz Highway and others want it under Hotel Street. I cast my vote for the Nimitz Highway alignment, and here's why:

- The Aloha Tower complex has the space and the structures for future expansion of a station there.

- The most traffic anywhere near downtown is on Nimitz Highway and a station there would significantly reduce traffic once people get used to the idea of riding rapid transit.

- Hundreds of riders crowding the two small sidewalks of Hotel Street could be as nightmarish as the current traffic situation. Again, the Aloha Tower complex would disperse the crowds a lot.

There is no question in my mind that the Nimitz Highway alignment offers the most long-term potential for this stretch of the line.

Aloha,

Cindie Byers
Dear Rapid Transit,

Which is the shortest drive during rush hours and weekends from Aiea to downtown -- H1 or Nimitz Highway? The answer is Nimitz, because H1 is congested.

H1 is supposed to be an expressway; instead it's a slow rolling parking lot. Why? Because we don't have traffic relief. Let's get moving!

And let's move it down Nimitz, where retailers along that route will have a chance to earn some revenues, which translate to taxes, which bring budget authority for rapid transit.

Nicolette Nye
94-816 Kumukula Street
Waipahu, HI 96797
March 23, 1992

Frank Doyle
Office of Rapid Transit
711 Kapiolani Blvd.
Honolulu, HI 96813

Dear Frank:

People have been arguing about the planned alignment of Honolulu's rapid transit system as it goes through the heart of the downtown district. Instead of going underground beneath Hotel Street, the City is planning to run it above ground on Nimitz Highway, right next to the Honolulu Harbor Waterfront.

The arguments against the Nimitz alignment seem minimal at best. "Hotel is a more convenient location." Convenient for who? I work less than half a block from the planned station. If the system ran under Hotel, I and my fellow employees would have to walk five or six times as far to reach the Hotel Street station. Convenience certainly seems to be relative.

"It may disrupt our views of the waterfront." Disrupt whose views? And of what? The system will be two stories tall at most. I don't know of any buildings in downtown that are shorter than two stories. Unless you're standing on Nimitz Highway, you won't even see the guideway. There's already a two story ramp leading into Aloha Tower. Strangely enough, no one complained that it was blocking views until the rapid transit system was proposed.

It really seems to boil down to the cost. If the system ran under Hotel Street, the cost would increase by more than $300 million. A $300 million tax burden. $300 million to avoid a possible nuisance to some people.

The City made the right choice.

Sincerely,

Neal Yokota
CERTIFICATION

I HEREBY CERTIFY THAT THE MICROPHOTOGRAPH APPEARING IN THIS REEL OF FILM ARE TRUE COPIES OF THE ORIGINAL DOCUMENTS.

DATE

SIGNATURE OF OPERATOR