

Cliff Slater
3105 Pacific Hts Rd
Honolulu Hawaii 96813

July 22, 2013.

Mr. Ted Matley,
FTA Region IX,
201 Mission Street, Suite 1650
San Francisco, CA 94105

Mr. Daniel A. Grabauskas
Honolulu Authority for Rapid Transportation
City and County of Honolulu,
1099 Alakea Street, Suite 1700
Honolulu, HI 96813

Dear Mr. Matley:

Our comments on the 2013 Draft Supplemental EIS for the Honolulu rail project

The following are our comments on the 2013 Draft Supplemental Environmental Impact Statement (DSEIS) for the rail project:

A. Issuance of the DSEIS was improper

Your 2013 Draft Supplemental Environmental Impact Statement (DSEIS), p. 1, states:

A separate evaluation is underway related to the identification of previously unidentified potential TCPs, as required in the Project's Section 106 Programmatic Agreement. Any identified TCPs would be evaluated in accordance with 36 CFR 800 and any use would be documented in a supplement to the Project's Record of Decision. DSEIS p. 1.

The evaluation of potential TCPs requires a 4(f) analysis and should be so described in the 4(f) section of the DSEIS. Further, the issuance of the DSEIS prior to completion of identification of TCPs is premature and also improper.

B. Failure to "rigorously explore" alternatives

Typical of the City and HART's handling of alternatives in the entire environmental process since its inception, is the lack of any effort in the DSEIS to examine alternatives in dealing with both the avoidance of Mother Waldron Park, and modifications of the Beretania Street Tunnel route.

1. Mother Waldron park could be avoided by using one of two alternate routes:
 - a. Changing the current route to continue along Ala Moana Boulevard, instead of turning along Halekauwila Street, and turning up Ward Avenue to unite with the current Project route at approximately *Ross Dress for Less*.

- b. Changing the current route to continue along Ala Moana Boulevard, instead of turning along Halekauwila Street, and turning up Kamakee Street (a large parking lot is at the makai/Ewa corner) and joining the current Project route at Queen and Kamakee Streets, the makai/Koko Head corner of which is a landscaped area. Both ends of Kamakee Street thus allow relatively shallow turns onto Kamakee and Queen Streets.
2. The Beretania Street Tunnel Alternative could be modified by shortening the current route to begin at the junction of Farrington Highway and Fort Weaver Road, the Mauka/Ewa corner of which consists of empty fields suitable for a large parking area.

This would reduce the Beretania Tunnel Alternative cost by approximately \$600 million. The reduced cost added to the advantage of avoiding the Downtown historic waterfront area would make this alternative preferable to the present Project route.

C. References to “planned extensions” should not be considered in the DSEIS

The DSEIS, Table 3, compares the effectiveness of the Project, the Beretania Street Tunnel Alternative, and the Project with Planned Extensions.

HART forecasts more riders for The Beretania Tunnel Alternative than it does for the Project. It is unreasonable to even mention the Extensions since they are highly unlikely to ever be built as Hawaii’s Chief Federal District Court Judge Mollway opined on behalf of the entire Court in her comments on the DSEIS.

HART tells us that the Extensions would cost [an additional \\$4 billion](#) and Senator Daniel Inouye is no longer with us. Further, the 80 percent increase in costs would only result in a 28 percent increase in riders. (FEIS, p. 3-75.)

The “planned extensions” referenced in the Final EIS were not subject to environmental analysis in that document. They should have been analyzed in the Final EIS because there have been many instances of the City/HART alluding to constructing these extensions in the future. Had these extensions been examined for their environmental impacts from rail, the City would have been faced with significantly damaging two major karst systems, the Ewa and the Moili’ili systems (see endnotes). As it is, there are no mentions of karsts either in the Final EIS or the DSEIS.

D. The Beretania Tunnel Alternative offers the “least overall harm”

A least overall harm analysis balances these factors to eliminate the alternative(s) that, on balance, present the greatest harm in light of the Section 4(f) statute’s preservationist perspective. DSEIS, p. 11.

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HART's analysis fails in its attempt to portray the Project as being the least harmful to our environment. To put it in perspective, the 100 year-old Outdoor Circle, Hawaii's oldest environmental organization, described the Project as being "the biggest threat to Oahu's landscape in the past 100 years."

HART skews its analysis of the threat that the Project poses by merely using quantitative analysis rather qualitative. By just using quantities it includes virtually irrelevant 50-year old tear-downs as being historic sites comparable to the Dillingham Transportation Building, the Chinatown Historic District, and other significant buildings in our historic waterfront area. This is nonsensical.

Further, in the DSEIS it states:

Overall, the Beretania Street Tunnel Alternative is located in an area with a lower potential to encounter archaeological resources and burials than the Project; however, the alignment, station locations, and portal locations for a tunnel are much less flexible than the column locations for an elevated guideway. As a result, the potential impact at the portals and stations is higher for the Beretania Street Tunnel Alternative than for the Project, which would disturb a limited area at column footings and stations. The Project would disturb 8 acres of land for column foundations, utility relocations, repaving, and elevated stations, which is 5 acres less than the Beretania Street Tunnel Alternative.
DSEIS, p. 58.

This totally ignores that the whole waterfront segment would have supporting pillars almost twice the square area of the Tunnel Alternative and, in addition, those pillars will sit upon pile caps of an approximate size of 42' x 12' x 5', which in turn will be capping three to five pillars underneath it.

In short, any harm to the historic properties and burial sites along the Beretania Tunnel Alternative cannot begin to compare to the harm that the present Project would do to our historic waterfront area.

Table 3 compares effectiveness of the Project, the Beretania Street Tunnel Alternative, and the Project with Planned Extensions. The tunnel option forecasts more riders than does the Project. It is unreasonable to even mention the Extensions since they are highly unlikely to ever be built as the Hawaii Federal Judges' letter mentioned earlier attests to. Further, the 80 percent increase in costs to build the extensions would only result in a 28 percent increase in riders. (FEIS, p. 3-75.)

Sincerely,



Endnotes:

A. Moiliili Karst

1. http://www.honolulutraffic.com/Technical_reports/archaeological_resources.pdf
2. http://www.honolulutraffic.com/Admin_Record/Administrative_Record_rev_2.28.12/Administrative_Record_Volumes_1-11/Vol002_AR00028614/AR00037676.pdf p. 4-72 (AR00037785)
3. <http://www.caves.org/pub/journal/PDF/V60/V60N3-Halliday.pdf>
4. <http://www.caves.org/section/ccms/wrh/>
5. <http://totakeresponsibility.blogspot.com/2012/12/moiliili-karst-moiliili-water-cave.html> Peter T. Young, former head of DLNR.

B. Ewa Karst

PROPOSED AMENDMENT	RESPONSE
10. (B) <u>Ewa Plains Karst Water System</u> . Recognize in the EDP that the Ewa Plain's water system is an important hydrological, geological and cultural feature with possible hazards that may need mitigation.	<ul style="list-style-type: none">• The proposed 'Ewa DP adds a policy protecting endangered fish and invertebrates present in sinkholes such as Ordy Pond.• It is not clear what specific policies or guidelines are desired beyond the existing and proposed policies protecting natural, cultural, and historic resources in 'Ewa and guarding and conserving the 'Ewa nonpotable aquifer.

1. http://dev.honoluludpp.org/Portals/0/pdfs/planning/ewa/ewa5yr/130328_DPPT_oZPC.pdf page 7 of 9.
2. <http://www.honolulustransit.org/media/50597/20111206-aisp-wofh-sec3.pdf> p. 35.
3. http://ewaplainsprograms.weebly.com/uploads/1/5/0/6/15066970/rare_native_plant_stalls_land_plans_for_kalaeloa.pdf
4. https://gsa.confex.com/gsa/2003SC/finalprogram/abstract_48485.htm
5. <http://www.koolina.com/storytellers/unearthing-the-past>
6. Aila letter: <http://www.honolulustransit.org/media/81727/20120420-letters-traditional-cultural-properties-analysis.pdf>