

The FTA and the City have problems with their environmental evaluation

Their Draft EIS is seriously legally deficient regarding their presentation of the issues.

First, the City did not “Rigorously explore and objectively evaluate all reasonable alternatives” during the Alternatives Analysis process as required by law. The at-grade light rail and the Managed Lanes alternative (Bus/Rapid Transit on tollway) are two obvious ones that should have been “rigorously” explored.

At the same time they are supposed to be exploring alternatives, they are also required to work with “consulting parties” such as the Historic Hawaii Foundation and the O’ahu Island Burial Council about routes and technologies that might avoid Honolulu’s historic properties and burial grounds. They did not do that.

In fact, the FTA allowed the City to dismiss the Managed Lanes Alternative from the EIS before it had been fully evaluated. The FTA even restarted the environmental process by issuing a second notice in the Federal Register to restart the process, the only difference being that the Managed Lane Alternative was omitted.

The correct and legal early evaluation of alternatives is imperative not only for transportation purposes but also to evaluate how to avoid or mitigate the impacts of rail on historic properties including Hawaiian burial grounds.

In the EIS they totally downplayed the drastic environmental impact of the rail line in Honolulu’s historic districts. The trains run on a 30-foot wide, 35-foot high concrete rail bed, supported by 6 to 8-foot diameter pillars carrying trains every 1½ minutes at 79 decibels. These impacts are impossible to mitigate; they could have chosen an alternative route/technology that would avoid the historic properties altogether and complied with the law.

In the EIS they are supposed to rigorously study the full extent of the line from Kapolei to UH Manoa and Waikiki. In fact, they only studied the starter version from East Kapolei to Ala Moana Center. This omission poses major legal problems for them.

The EIS renderings deliberately misrepresented the visual impact of the rail line. The widths of the guideways shown are undersized, the supporting columns are also shown undersized, and none of the tall sound-mitigation panels are shown. Even the shadows cast by the project are deemphasized. In short, the intrusiveness of the project on our city is not realistically portrayed.

They misrepresent residents’ views in the EIS by selectively choosing those official polls purportedly showing that residents prefer rail to roads while omitting those polls showing that residents prefer roads to rail.

The EIS discussions of traffic congestion have carefully avoided any comparison of future traffic with rail versus today’s traffic. To do so they would have to admit that their forecast shows that traffic in the future will be far worse than it is today, even with rail.

Another problem the FTA faces is that while its goal is to “*aggressively support proactive public involvement at all stages of planning and project development,*” it has not done so. The FTA has allowed the City to spin, mislead, obfuscate and lie on the most important rail transit issues about which the voters should be well informed. FTA cannot say that it did not know about these misrepresentations because we have on many occasions complained about them and we have given the FTA the full details.

Maybe the City and the FTA will somehow be able to take the completely legally deficient Draft EIS and produce a legal Final EIS. We doubt it.