

29 December, 2008

To:

Mr. Wayne Yoshioka
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Subject: Comment on Draft Environmental Impact Statement (DEIS) “Honolulu High-capacity transit corridor Project”,

Issue : The DEIS lacks the Managed Lane Alternative (MLA) as stated in the Notice of Intent (NOI) dated 7 Dec 2007 (reference (a), which states: “The Federal Transit Administration (FTA) and the City and County of Honolulu, Department of Transportation Services (DTS) intend to prepare an EIS (and Alternative Analysis (AA)) on a proposal by the City and County of Honolulu to implement transit improvements that potentially include high-capacity transit service in a 25-mile travel corridor between Kapolei and the University of Hawaii at Manoa and Waikiki. **Alternatives** proposed to be considered in the AA and draft EIS include **No Build, Transportation System Management, Managed Lanes, and Fixed Guideway Transit**. Other transit alternatives may be identified during the scoping process.”

Discussion:

The process used by the City & County of Honolulu (City) for assessing the Managed Lane Alternative (MLA) in the City’s Alternatives Analysis (AA) was flawed.

- a) A similar length Managed Lane, reversible three-lane transit way was built for \$320 million in Tampa in year 2005, while the City AA estimated the similar MLA to cost \$2.6 Billion.
- b) Professor Panos Prevedouros published a study for Managed Lanes (reversible) in March 2008, “ Transportation Alternatives Analysis for Mitigating Traffic Congestion between Leeward Oahu and Honolulu” which shows the 11 mile three-lane cost estimate to be \$900 million which is in line with the \$320 million Tampa three-lane reversible transit way. The professor believes the Plan's costs are accurate based on cost estimate spreadsheet analysis received from a local heavy construction estimation expert is \$818,634,000 in 2008 dollars. Again, this estimate is more in line with the Tampa three lane reversible Transit way estimate and refutes the AA estimate of \$2.6 Billion. The AA estimate disqualified the Managed Lane Alternative to be inferior to the Rail Alternative which cost \$3.7 Billion.
- c) 2008 Mayoral Candidate Ann Kobayashi, using the Professor’s Managed Lane study and the former Mayor Harris Administration BRT Study, proposed a similar Managed Lane 15-mile fixed guideway which is estimated at \$1.2 Billion. The estimate is similar to the 11 mile Managed Lane and which should have been used in the AA rather than \$2.6 Billion.

d) Parsons Brinkerhoff (PB) and the City proposed that automobiles with two or more occupants should be allowed toll free on the MLA. This made the current contraflow zipper lane untenable and thus provided the rationale for removing it. The net result was that the additional two lane advantage that the MLA offered to the Corridor was reduced to one lane. They failed to publish their assessment of the option of having all autos pay a toll, which would have resulted in the zipper lane and the two-lane advantage being retained. And they failed to analyze MLA options with higher occupancy thresholds, such as three through five occupants.

e) PB and the City added unnecessary costs to the project by proposing a 16-mile facility while not testing the viability of shorter 10 to 12-mile versions.

f) PB and the City inflated MLA operating costs to make the project appear uncompetitive with the Fixed Guideway Alternative. Just two examples are a) the projection of a totally unnecessary 5,400 parking stalls for the MLA, and b) saddling the MLA with inflated bus operating costs.

g) PB and the City engineered the ingress and egress ramps in a way that could only result in heavy traffic congestion at these points. **In fact, the MLA has exit/off ramps along its route for access to job centers other than downtown Honolulu.**

h) PB and the City grossly inflated the capital costs of the MLA with the result that, if correct, it would be twice the cost per lane mile of any highway ever built in the U.S. In his letter to the City and copied to FTA, Dr. Panos Prevedouros, Professor of Traffic Engineering at the University of Hawaii, Chair of the Transportation Research Board's Highway Micro-simulations Committee and a member of the Task Force, commented, "the most egregious violation of FTA's rules on alternative specification and analysis was the deliberate underengineering of the Managed Lanes Alternative to a degree that brings ridicule to prevailing planning and engineering principles."

i) The 11 mile, elevated reversible MLA, with three lanes as proposed by Professor Prevedouros, has the commuter capacity to eliminate the two H-1 bottlenecks at Pearl City and at Middle Street merge. The Rail, according to the AA, table 3-12, will result in 17,500 vehicles per hour on H-1 (H-1 full capacity = 9,500 vph) because the Rail cannot accommodate the full commuter demand in year 2030.

Conclusion: The City's AA wrongly estimated the cost of the Managed Lane Alternative and the MLA capacity to eliminate the H-1 bottlenecks on H-1.

Recommendation: It is requested that the Managed Lane Alternative as proposed by Ann Kobayashi's EzWay proposal or the Professor Prevedouros Managed Lane Study be reinstated into the Honolulu's Transit Corridor Draft Environmental Impact Statement

Reference (a):

[Federal Register: December 7, 2005 (Volume 70, Number 234)] [Notices]

Respectfully,

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