

29 December, 2008

To:

Mr. Wayne Yoshioka  
Director Department of Transportation Services  
City and County of Honolulu  
650 South King St. 3rd Floor  
Honolulu  
HI 96813  
FAX: (808) 587-6080

Subject: Comment on Draft Environmental Impact Statement (DEIS) “Honolulu High-capacity transit corridor Project”, Issue : The DEIS and alternative Analysis do not investigate a wide range of alternatives as required by law.

Discussion: The Alternative Analysis and DEIS failed to provide “... an assessment of a wide range of public transportation alternatives ...” and/or “... sufficient information to enable the Secretary to make the findings of project justification ...” as required by statute.

In addition, we believe that you will find that the City, PB and FTA failed to, “Rigorously explore and objectively evaluate all reasonable alternatives,” and “Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits,” as required by the Council on Environmental Quality (CEQ) Sec. 1502.14.

Four alternatives should be assessed:

- 1) BRT transit system as proposed by the Harris Administration. The BRT route downtown should be limited to King and Beretania Streets ( a couplet) and exclude Dillingham Blvd and Kapiolani Blvd which do not have sufficient lanes to accommodate BRT.
- 2) Managed Lane (reversible three lanes) as proposed by Professor Panos Prevedouros Study, “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 full report is available at [www.eng.hawaii.edu/~panos/UHCS.pdf](http://www.eng.hawaii.edu/~panos/UHCS.pdf).**
- 3) Former mayoral candidate Ann Kobayashi’s proposal for a 15 mile EzWay. See <http://www.honoluluadvertiser.com/article/20081015/NEWS01/810150392/1001>
- 4) Build two elevated highway bypasses around the H-1 bottlenecks at H-1/H-2 merge and at Middle St. merge. The bypasses include: (a) “Kamehameha HOV Flyover”, a four-mile, three-lane reversible elevated hwy over the Kamehameha Hwy median between the H-1/H-2 merge and the H-1 Viaduct east of Aloha Stadium and (b) “Nimitz Flyover”, a three- mile, three-lane reversible elevated hwy over the Nimitz Hwy median between the H-1 Viaduct at Keehi Lagoon Drive and Hotel St/Alakea St./ Halekauwila St/Ala Moana Blvd. An on/off ramp to Waikamilo Rd from the Nimitz bypass would reduce the number of lanes from three to two between Waikamilo Rd and Iwilei. See attachment for more information on HOV Flyovers.

Recommendation: Include the above four alternatives in the DEIS.

Respectfully,

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Copy to:

1) Mr. Ted Matley  
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2) Governor Linda Lingle  
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Honolulu, HI 96813  
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3) Honolulu City Council Members  
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Attachment – Description of Nimitz and Kamehameha HOV Flyovers

**Nimitz Flyover, Reversible HOV:**

The Nimitz HOV Flyover is a 3-mile reversible, elevated, three-lane structure over the Nimitz Highway median from the Airport Viaduct at Keehi Lagoon to Hotel Street and Alakea St/Halekauwila St. The Flyover would be built similar to the Tampa Elevated three-lane Reversible HOV as described in- <http://www.tollroadsnews.com/node/172> .

One of the three lanes would exit the Flyover at Waikamilo Rd. to provide access to job centers in Kalihi, resulting in the Flyover having only two lanes entering downtown. The downtown terminal connections from the Nimitz HOV Flyover include an elevated busway from Iwilei to Hotel Street and a single lane underpass to both Alakea St/Halekauwila Streets. These connections are described in a Managed Lane Study "Transportation Alternatives Analysis for Mitigating Traffic congestion between Leeward Oahu and Honolulu". The full report is available at [www.eng.hawaii.edu/~panos/UHCS.pdf](http://www.eng.hawaii.edu/~panos/UHCS.pdf).

The initial 2005 cost for the 10 mile Tampa Reversible was \$320 million or \$32 Million per highway mile, however, a geotechnical design error increased the cost to \$420 million or \$42 million per mile. Using a geographic and escalation factor of 100 percent, the 3-mile Nimitz HOV Flyover at \$60 to \$80 million per mile would cost \$180 million to \$240 million.

The "Nimitz Flyover" has an approved Final Environmental Impact Statement which allows for early construction.

### **Kamehameha Flyover, Reversible HOV:**

The Kamehameha HOV Flyover is a 3-mile reversible, elevated, three-lane structure over the median of Kamehameha Highway from the H-1/H-2 merge at the Waiawa Interchange to the Airport Viaduct just diamond head of the Aloha Stadium. The Flyover would be built similar to the Tampa Elevated three-lane Reversible HOV as described in-  
<http://www.tollroadsnews.com/node/172> .

The Kamehameha Flyover would be connected to H-1, H-2, Kamehameha Highway and Farrington Highway at the west end and to the Airport Viaduct at the east end. These connections are described in a Managed Lane Study "Transportation Alternatives Analysis for Mitigating Traffic congestion between Leeward Oahu and Honolulu". The full report is available at [www.eng.hawaii.edu/~panos/UHCS.pdf](http://www.eng.hawaii.edu/~panos/UHCS.pdf).

The initial 2005 cost for the 10 mile Tampa Reversible was \$320 million or \$32 Million per highway mile, however, a geotechnical design error increased the cost to \$420 million or \$42 million per mile. Using a geographic and escalation factor of 100 percent, the 4-mile Kamehameha HOV Flyover at \$60 to \$80 million per mile would cost between \$240 million to \$320 million.

The Draft Environmental Impact Statement (DEIS) - Honolulu High-Capacity Transit Corridor Project Nov 2008 , shows the rail route over Kamehameha Highway between Pearl City and Aloha Stadium which could conflict with the proposed three-lane "Kamehameha Flyover" route outlined above. If the rail is built, it is suggested that both the Kamehameha Highway "Flyover" and the Rail be built within the elevated Kamehameha Highway corridor. In this case, only a two-lane "Kamehameha Flyover" is needed (instead of three-lanes) to be built alongside and parallel to the Rail transit. The rail with a capacity of 6,000 commuters per hour and the two-lane "Kamehameha Flyover", with a capacity of 4,000 vehicles per hour, should be adequate to substantially reduce the bottleneck at the H-1/H-2 merge and the traffic congestion on H-1 between Pearl City and Aloha Stadium.