

A guide to Honolulutraffic.com's comments on the Draft EIS

Our comments sent to Federal Transit Administration and the City ran to 67 pages in seven parts; this summarizes it but you can link to the detail at www.honolulutraffic.com/EIScomments.htm. The following show what each part covers and there is a link to each one.

Elevated rail is environmentally degrading

More than anything else the aspect of the proposed rail line that has generated the most comments is opposition to an elevated rail line going along the waterfront and through our city. The visual blight and noise of trains passing by every 1½ minutes is offensive to many including virtually all of the environmentally concerned organizations in Hawaii. [\(Part II\)](#)

Alternatives not studied

Alternatives that would have made such blight unnecessary, such as real light rail, was not studied, the Managed Lanes Alternative was contrived to fail and a modified version of the 2003 Bus/Rapid Transit proposal was ignored. Rejecting the latter was strange since Parsons Brinckerhoff had projected more ridership for it than they presently do for rail — and at 20 percent of the cost. [\(Part I\)](#)

The full project must be studied in the EIS

The definition of the Project has been changed to East Kapolei to Ala Moana Center. We believe that the City cannot get away with not studying the extensions to UH Manoa and Waikiki.

Reasons for that are:

- They must spell out the visual and noise impacts in these mostly residential areas,
- They must explain how they would traverse Ala Moana Center. The present plan has the rail line stopping short of the Center's built up area that covers Kona Street.

We believe that the City has no plans to go beyond Ala Moana Center and, if so, they should come clean about it so that citizens may judge the value of a rail line that does not go to UH or Waikiki [\(Part III\)](#)

The "Train to Nowhere" is in violation of the Environmental Policy Act rules

The City can only build this segment if it is economically useful — and it is not. Building the first segment of the rail line from East Kapolei to Pearl Highlands (the "Shopper's Special") to open in 2013 is crazy. The rest of the line to Ala Moana Center is not planned to open until 2019. First, the Shopper's Special would be shuttling back and forth for 6 years virtually empty. Second, there is a grave danger that the feds might back out of funding the full line in the interim and local taxpayers would be faced with funding the rest of it themselves [\(Part IV\)](#).

Forecasts not justifiable

The computer model that forecasts ridership for rail, also forecasts ridership for what is called the "No-Build Alternative," which is the ridership we would have if we did not do much more that is already planned in highway and bus improvements.

In 1992, as part of the then rail study, Parsons Brinckerhoff forecast an 8 percent increase in bus ridership for the 2005 "No-Build"; instead we got an 8 percent decline. In 2003 as part of the then Bus/Rapid Transit study Parsons forecast a "No-Build" increase for 2006 to 81.1 million; the actual riders were 70.4 million. That's a huge error for a forecast made only 3 years earlier.

Now they forecast in the Draft EIS that by 2030 we will have a 25 percent increase in riders for the “No-Build” alternative. Ridership is down about 10 percent from 15 years ago despite a recent up and down in ridership due to high gas prices. How can they explain this? They do not.

The point of all this is that the City uses the same computer model to forecast rail ridership as they do for the “No-Build.” If the “No-Build” is exaggerated so is the rail forecast. ([Part V](#), page 1)

The City is also forecasting decreases in energy use if we build rail. This is nonsense. Modern rail lines on average use 20 percent more energy per passenger mile than the average auto ([Part II](#), page 2.) And this increase does not take into account the energy used in constructing rail, which is 19.4 years worth of operating energy use according to City data. Nor does it take into account that bus/rail/bus travel is less direct than auto travel and thus uses more energy.

The forecast for tax revenue collection is way off ([Part V](#), page 3). If you take current tax collection levels, apply the Council on Revenues forecasts through 2015, then apply the City’s forecast percentage through 2023, you find they are \$750 million short of their revenue forecast.

The City has totally understated all the risks inherent in any large public works project — especially rail transit. Construction and operating cost overruns, revenue shortfalls, and ridership shortfalls are all a problem. See the evidence ([Part V](#), page 5)

“Strategic misrepresentations

And then we come to the “strategic misrepresentations” common to all rail projects ([Parts 6 & Part 7](#)). The biggest one is that traffic congestion with rail in the future will be better than it is today; the City’s own studies show that it will be worse. We devote 22 pages to this most egregious behavior by the City Administration and its consultants, and employees.