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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII**

HONOLULUTRAFFIC.COM;  
CLIFF SLATER; BENJAMIN J.  
CAYETANO; WALTER HEEN;  
HAWAII'S THOUSAND  
FRIENDS; THE SMALL  
BUSINESS HAWAII  
ENTREPRENEURIAL  
EDUCATION FOUNDATION;  
RANDALL W. ROTH; DR.  
MICHAEL UECHI; and THE  
OUTDOOR CIRCLE,

Plaintiffs,

v.

FEDERAL TRANSIT  
ADMINISTRATION; LESLIE  
ROGERS, in his official capacity  
as Federal Transit Administration  
Regional Administrator; PETER

Case No. 11-00307 AWT

**DECLARATION OF CLIFF  
SLATER IN SUPPORT OF  
PLAINTIFFS' REQUEST  
FOR INJUNCTIVE AND  
DECLARATORY RELIEF**

Hon. A. Wallace Tashima

Action Filed: May 12, 2011

Trial Date: None Set

M. ROGOFF, in his official capacity as Federal Transit Administration Administrator; UNITED STATES DEPARTMENT OF TRANSPORTATION; RAY LAHOOD, in his official capacity as Secretary of Transportation; THE CITY AND COUNTY OF HONOLULU; WAYNE YOSHIOKA, in his official capacity as Director of the City and County of Honolulu Department of Transportation.

Defendants.

and

FAITH ACTION FOR COMMUNITY EQUITY; THE PACIFIC RESOURCE PARTNERSHIP; MELVIN UESATO

Intervenor Defendants.

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I, Cliff Slater, declare as follows:

1. I am a resident of Honolulu, Hawaii, and have been actively involved in the Honolulu High-Capacity Transit Corridor Project (the “Project”) since its inception. I have been involved as an individual. I have also been involved in my capacity as Chair of HonoluluTraffic.com, a non-profit organization whose mission is to be a watchdog for transportation issues, to foster discussion of cost-effective solutions for traffic problems, and to advocate solutions for traffic congestion that do not ruin the ambiance of downtown Honolulu. I have personal knowledge of the matters stated herein

and, if called as a witness, could and would testify competently thereto.

2. I visit downtown Honolulu (an area roughly stretching from Chinatown to the Kaka 'ako neighborhood) roughly two times per week and will continue doing so for the foreseeable future. I enjoy the recreational opportunities, views, and aesthetic environment of the downtown area, and I choose to visit precisely because the area contains (a) buildings and districts which maintain their historic feel and (b) views of the waterfront, the city, the sky, and the hills.

3. I particularly enjoy walking along Halekauwila Street, walking in the historic waterfront area near Aloha Tower, the Dillingham Transportation Building, and the Merchant Street Historic District through and into the Chinatown neighborhood. The Project would significantly interfere with my ability to enjoy these areas because it would destroy the historic sense of place there; would cut off views of the waterfront and the sky; and would fundamentally and forever change the entire aesthetic environment of downtown Honolulu.

4. In my capacity as Chair of HonoluluTraffic.com, I helped design the organizing statement that it was a "Community wide effort to keep elevated rail out of our city." I also helped our organization's proposed alternative to the Project. In doing so, one of my goals was to find a way to avoid severe impacts to historic downtown Honolulu, an area which is very important to me.

I declare, under penalty of perjury that the foregoing is true and correct.

Executed November 30, 2012  
at Honolulu, Hawaii

A handwritten signature in black ink, appearing to read "Cliff Slater", written over a horizontal line.

**Cliff Slater**