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SEEKING COST-EFFECTIVE SOLUTIONS TO TRAFFIC CONGESTION

April 2, 2007

FHWA
Attn: Elizabeth Fischer
PO Box 50206
Honolulu Hawaii 96850
By email: Elizabeth.Fischer@fhwa.dot.gov

Dear Ms. Fischer:

Comments concerning the OMPO transportation planning process.

Our members have two concerns with the Oahu Metropolitan Planning Organization's (OMPO) planning process. First there has been no attempt by OMPO staff to practice "proactive public involvement" as required by regulation. Second, while we have submitted comments on the Draft 2030 Oahu Regional Transportation Plan (ORTP) and the Modification to it, we have yet to receive responses to them. Third, we object to the lack of clear unambiguous statements in the ORTP process. Fourth, there were significant changes made to the Draft ORTP after it was circulated to the public. We had no opportunity to comment on them.

Lack of "proactive public involvement."

"The planning regulations require that the metropolitan transportation planning process include a proactive public involvement process that provides complete information, timely public notice, reasonable public access to key decisions, and supports early and continuing involvement of the public in developing plans and TIPs." <http://www.fta.dot.gov/FY2007TriReview/11planning.htm#Q6>

Involvement is a word that has a far stronger meaning than mere notification, or the public having the ability to comment on draft documents. Our legal dictionary describes *incriminate* as, "To hold or charge someone with involvement in a crime." The American Heritage Dictionary describes it as, "To engage as a participant; to connect closely." It comes from the Latin for *enwrap*, to make part of, to be a participant. In short, to be involved is to be part of the process. It is an understatement to say that we have never, at any time, felt involved in the process.

Instead, we have had to practice *disinvolvement* (unravel or disentangle) of the documents that are produced by the RTP process in order to understand what is going on.

For example, we attach as Appendix A, a letter from Hawaii's Office of Information Practices (OIP), regarding our failed attempts to get at the assumptions being made for the ORTP ridership modeling. If this is pro-active public involvement, we must be speaking a different language.

Lack of clear language

At no time does the ORTP make it clear to the public that highway traffic congestion will be far worse in the future — even with rail transit in operation. This most important fact is one instance where OMPO does not give "complete information" but rather the ORTP is a selling document — one that tells its readers the advantages of a project but not its flaws.

For example, there is no discussion of the urban blight in residential areas caused by noisy elevated steel-wheel on steel rail heavy rail transit. It is an important fact since many communities have torn down their elevated highways and rail lines because of it.

The ORTP did not see daylight until March 2007, nearly a year after the last update was approved. We had assumed that it had yet to be approved since we had had no responses from OMPO to our comments and the language in the minutes supposedly approving the document is ambiguous:

“Approval to Update the ORTP -- Representative Souki moved and Mr. M. Kaku seconded that the update of the Draft ORTP 2030, circulated for public review on February 15, 2006, be approved, including the changes identified in the previous motions as well as editorial changes to be made by the OMPO staff. The motion passed unanimously.”

The language only updates the Draft ORTP 2030. It does not baldly say, as the meeting’s agenda did, that the committee voted on, “Approval of the Oahu Regional Transportation Plan 2030.”

No responses to our Draft ORTP comments.

As far as we can tell no commenter has received responses to the comments they made on the Draft ORTP.

Changes to the Draft ORTP after the public presentation.

The changes approved by the Policy Committee were only on the projects and little on the Draft ORTP text. However, the text of the final ORTP, after staff editorial changes, differs markedly from what was presented to the public and also, assumedly, approved by the OMPO Policy Committee. The Draft ORTP was posted on the OMPO website main page until March 2007 when the final version was posted. The following are examples that we would have liked to comment on:

1. “We will also not be able to eliminate congestion by building more highways, for we do not have the resources to keep up with the demand.” ORTP 2030 p. 4.

We would have disputed that statement since the rail/bus system, according to the ORTP 2030 (p. 6) will need \$5.62 billion in operating costs while highways only needed \$532 million for operating costs in the same period. Further, toll roads normally pay for themselves.

2. With rail the “... the transit mode share is projected to increase from 5.7% to 8.9%,” ORTP 2030. p. 7.

We would also have disputed this possibility since no metro area in the U.S. has had a 56 percent increase in market share during any 20-year period. In fact, none have had any increase, let alone 56 percent.

Thank you for the opportunity to comment on the RTP process

Sincerely,
HONOLULUTRAFFIC.COM



Cliff Slater
Chair

CDS/rrs