RECORD OF DECISION

Initial Operating Segment
of the
Primary Corridor Transportation Project
Honolulu, Hawaii
by the
Federal Transit Administration

DECISION

The U.S. Department of Transportation (U.S. DOT), Federal Transit Administration (FTA), has determined that the requirements of the National Environmental Policy Act of 1969 (NEPA) have been satisfied for the Primary Corridor Transportation Project – Initial Operating Segment (IOS) (Project) in Honolulu, Hawaii. The Project to which this Record of Decision (ROD) applies consists of the design, construction, and future operation of a bus rapid transit (BRT) system from Iwilei (North King Street and Beretania Street) to Waikiki (Kapahulu Avenue) in the City and County of Honolulu, Hawaii. The Project is the first phase of the larger Refined Locally Preferred Alternative (LPA) of the Primary Corridor Transportation Project (PCTP), and is called the Initial Operating Segment, or IOS.

The IOS is fully described and evaluated in the FTA Final Environmental Impact Statement (FEIS) issued on July 25, 2003. EPA published the Notice of Availability for the FEIS on August 8, 2003, in the Federal Register. FTA is the responsible federal agency. Cooperating agencies are the U.S. Army Corps of Engineers, the U.S. DOT, Federal Highway Administration (FHWA), and State of Hawaii, Department of Transportation (HDOT). The local lead agency for the Project, the City and County of Honolulu's Department of Transportation Services (DTS), has planned the Project, and will be responsible for building, operating, and maintaining the Project.

The subject of this ROD is only the IOS. It is planned that DTS will develop a supplemental environmental review for the remainder of the LPA and a new FTA funding will be required as well.

The Project includes the design and construction of a 5.6-mile high-capacity bus rapid transit route between Iwilei and Waikiki. The IOS builds upon the already started conversion of the existing bus system to a hub-and-spoke network. In addition to providing transit service, major construction elements include the construction of transit stops spaced approximately one-half mile or less apart, either at new locations or at existing bus stops; transit priority traffic signal improvements; roadway widening; landscaping; utility relocations; modifications to wheelchair ramps, curbs, sidewalks,

driveways, signage, striping, roadway lighting, and other work related to signal prioritization.

BACKGROUND

The primary transportation corridor generates the vast majority of trips on the island. Its existing transportation infrastructure is overburdened handling this travel demand. Further investment is required to improve the effectiveness of the corridor's transportation infrastructure.

To this end, the City and County of Honolulu (City) initiated the Oahu Trans 2K program as its principal public outreach medium for the Primary Corridor Transportation Project. The Oahu Trans 2K series of participatory workshops began in the fall of 1998, and has thus far included five rounds of community outreach meetings. Oahu Trans 2K has been the most extensive community-based transportation planning effort in the City's history.

Together, DTS and HDOT went out to the public to provide background information on mobility issues and listen to the public. The meetings were widely advertised and well attended. These meetings resulted in establishing the following initial set of alternatives, which were identified in formal public notifications that DTS and FTA planned to prepare a Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS):

- No-Build Alternative. Expansion of existing bus service in developing areas.
- Transportation System Management (TSM). Low to moderate cost measures making more efficient use of existing transportation infrastructure.
- BRT. Builds upon the TSM Alternative, and including bus priority measures and a trolley system between Downtown Honolulu and Waikiki.
- Light Rail Transit (LRT). An at-grade light rail system using three alignment alternatives.
- Sand Island Scenic Parkway (SISP). A new road connecting Keehi Interchange and Kakaako via Sand Island that could be paired with BRT and LRT Alternatives.

The Notice Of Intent (NOI) for the MIS/DEIS was published in the April 27, 1999, edition of the Federal Register. Also, an EIS Preparation Notice in the April 23, 1999 edition of The Environmental Notice.

Shortly following these public notices, the best features of the initial alternatives were combined to create improved alternatives. A new BRT Alternative was developed as a hybrid, containing the best features of the initial BRT and LRT Alternatives, resulting in the elimination of the LRT Alternative. Also, subsequent to Round 4 of the Oahu Trans 2K meetings, it was decided, based upon input from coordinating public agencies, to separate SISP from the other transit alternatives being considered in the MIS/DEIS.

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The MIS/DEIS was published in August 2000, and the public review period was from August 23, 2000, to November 6, 2000. The following alternatives were studied in the MIS/DEIS:

- No-Build Alternative. This alternative consisted of expanding bus service by adding buses and developing new routes in developing areas to maintain existing service levels.
- TSM Alternative. The primary features of this alternative were the reconfiguration of the present bus route network to a hub-and-spoke network, and bus priority treatment on some In-Town streets.
- BRT Alternative. This alternative built on the hub-and-spoke bus system in the TSM Alternative, and added Regional and In-Town BRT routes. The Regional BRT element included a continuous H-1 BRT Corridor from Kapolei to Downtown using a.m. and p.m. zipper lanes and new express lanes. The In-Town BRT component was comprised of a high capacity transit spine from Middle Street to Downtown, a University Branch from Downtown to UH-Manoa, and a Downtown to Waikiki Branch via Kakaako Mauka.

In addition to the MIS/DEIS public hearing, special public hearings were conducted by the Honolulu City Council Transportation Committee on September 25 and October 5, 19, and 26, and November 14, 2000. On November 29, 2000, the Honolulu City Council selected the BRT Alternative as the Locally Preferred Alternative (LPA).

At the time of adopting the LPA, the City Council asked DTS to continue public dialogue on the project. Community working groups were formed to provide a forum for open discussion between project sponsors and neighborhood, civic, business, government and other organizations so that environmental and transportation issues and refinements to project proposals could be discussed. The Pearl City/Aiea, Kalihi, Downtown/Kakaako, and Mid-Town/University Working Groups held several separate meetings between February and June 2001. Waikiki Working Group meetings were conducted from August 2001 through April 2002, and the Aliamanu/Salt Lake/Foster Village Working Group had one meeting in July 2002.

A Round 5 Oahu Trans 2K meeting was held on August 14, 2001 at Neal Blaisdell Center. This community open house included informational displays on different aspects of the BRT system and the Oahu Trans 2K program, specifically the project refinements developed by the Pearl City/Aiea, Kalihi, Downtown/Kakaako, and Mid-Town/University Working Groups.

As a result of the Working Groups and comments received on the MIS/DEIS, the DTS proposed to refine the LPA to include new and modified components, which the City Council endorsed on August 1, 2001. The new elements of this "Refined" LPA included:

- A new In-Town BRT branch was added between Iwilei and Waikiki to serve Aloha Tower Marketplace and the Kakaako Makai area;

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- A small segment of the UH-Manoa Branch was realigned from Ward Avenue to Pensacola Street between South King Street and Kapiolani Boulevard with a new transit stop along South King Street at Pensacola Street;
- The proposed H-1 Regional BRT ramps at Kaonohi Street and Radford Drive were eliminated, and were replaced with a new H-1 BRT ramp near Aloha Stadium at Luapele Drive; and
- The Kakaako Mauka / Iwilei-Waikiki Branch was re-aligned to use Alakea and Bishop Streets instead of Richards Street, creating two new transit stops, one on Alakea Street and one on Bishop Street.

Since the refinements were proposed after completion and distribution of the MIS/DEIS and because they were anticipated to have environmental impacts that were not disclosed in the MIS/DEIS, a Supplemental Draft Environmental Impact Statement (SDEIS) was prepared. The SDEIS was distributed in March 2002. The public and agency review period was from March 22, 2002, to May 7, 2002, and a public hearing was held on April 20, 2002.

Some of the comments on the SDEIS led to additional refinements, which included:

- Relocation of a park-and-ride facility from Kunia Road to North-South Road;
- Elimination of the Kapolei Direct BRT/HOV ramp, Kunia Direct BRT ramp, and Middle Street Direct BRT/ Park-and-Ride ramp; and
- Rerouting of a short section of the Iwilei-Waikiki branch of the In-Town BRT from Channel Street to Forrest Avenue.

Since these additional refinements were found to result in no increase in adverse environmental impacts or in reduced adverse impacts, while saving costs, they were incorporated into the Refined LPA, and were reflected in a State Final Environmental Impact Statement (FEIS), which was accepted by then Governor Benjamin J. Cayetano in November 2002.

The Refined LPA is programmed for construction over a 14-year period. Due to this long construction phasing, the FEIS identified elements of the Refined LPA that can be constructed within the first few years. The Iwilei-Waikiki IOS was selected as the most appropriate segment for initial implementation. The reasons for this decision are discussed later in this ROD.

A federal FTA FEIS focusing on the IOS was approved for distribution in July 2003. EPA published the Notice of Availability for the FTA FEIS in the Federal Register on August 8, 2003. Comments received on the FTA FEIS are also included below.

ALTERNATIVES CONSIDERED

The 2000 MIS/DEIS, 2002 SDEIS, 2002 State FEIS and 2003 FTA FEIS each examined three alternatives for the year 2025 that would encompass the entire primary

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transportation corridor: 1) No-Build Alternative; 2) a Transportation Systems Management (TSM) Alternative; and 3) the Refined Locally Preferred Alternative (previously also called the Bus Rapid Transit Alternative or the LPA). Each of the three alternatives includes all of the highway improvement projects in OMPO's Transportation for Oahu Plan 2025 (TOP 2025).

Because limited funding necessitated selecting only one portion of the Refined LPA for immediate implementation, the concept of the IOS as the first step to implementing the entire Refined LPA was highlighted in the 2003 FEIS. The IOS Chapter of that FEIS uses 2006 as the base year for analysis, comparing the 2006 IOS with the 2006 No-Build condition, because that will be the first full year with IOS implementation.

The three main alternatives were discussed in Chapter 2 of the FEIS and are summarized below. A summary of the IOS is also included after that of the Refined LPA.

2025 No-Build Alternative

The 2025 No-Build Alternative included existing transportation facilities and conversion of the present predominately radial bus system to a hub-and-spoke configuration. Expansion of the bus fleet to maintain current transit service levels, especially in developing areas such as Kapolei, was also part of this alternative. The No-Build Alternative served as a reference point against which the build alternatives were compared in terms of environmental impacts.

TSM Alternative (2025)

The TSM Alternative for the PCTP included reorientation of the present bus route structure from a predominantly radial service pattern to a hub-and-spoke network, extension of the H-1 A.M. zipper lane, bus priority treatments on selected arterials, and a significantly expanded bus fleet over the No-Build Alternative. There would also be two additional transit centers and one more park-and-ride facility with the TSM Alternative. Additionally, many of the other transit centers would be larger compared to those proposed under the No-Build Alternative.

Refined LPA (2025)

Under the Refined LPA, the Regional and In-Town BRT elements would integrate with the hub-and-spoke bus network to create a fast, high-capacity transit system spanning the primary transportation corridor. The In-Town BRT will provide high capacity, frequent, in-town transit service throughout Honolulu's Urban Core (Middle Street, through Downtown Honolulu, to UH-Manoa and Waikiki). The Regional BRT will incorporate regional transit routes that utilize bus priority facilities (express lanes) on the H-1 Freeway, creating an H-1 Freeway BRT Corridor, with priority treatment for regional transit vehicles at selected ramps and arterials to facilitate movement between the H-1 Freeway BRT Corridor and the corridor's transit centers. The Refined LPA will utilize

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expanded capacity, increased frequency, and enhanced service quality to attract commuters and mid-day riders.

Together, the Regional BRT and In-Town BRT will provide an integrated transit system enhancing mobility within the primary transportation corridor, and between the primary transportation corridor and other parts of the island. Some of the regional local buses will terminate at the Middle Street Transit Center, while other regional express routes will continue into town using the In-Town BRT priority lanes, eliminating the need for many passengers commuting from outlying areas to transfer at Middle Street. In addition, through integrated planning and use of timed-transfers at outlying transit centers, route duplication will be reduced, system capacity will be increased, and schedule reliability will be improved.

Iwilei to Waikiki Initial Operating Segment (IOS)(2006)

The IOS is the Project as it will exist in 2006. It will provide frequent service and direct access to major activity destinations and residential neighborhoods in Honolulu's urban core. The IOS will offer bus service that operates every six minutes during peak hours and every ten minutes during off-peak hours.

The IOS will improve travel time between its end points in Downtown (Beretania Street/Aala Park stop) and Waikiki (Kapahulu Avenue stop) by eight to ten minutes over comparable existing bus routes that travel along the Ala Moana Boulevard corridor, as well as providing improved travel times for points in between. The IOS will provide service to Kakaako Makai, an emerging redevelopment area, where no transit service currently exists.

The IOS will use 60-foot long articulated hybrid diesel-electric vehicles operating at-grade in exclusive or semi-exclusive lanes for 2.5 miles and in mixed traffic for 3.1 miles. Semi-exclusive lanes are shared with local buses and right-turning vehicles (as well as private buses and transit vehicles in Waikiki). The BRT vehicles will include features such as low floors that match the height of the station platforms, extra-wide doors, and traffic signal priority at selected intersections.

The following is a list of transit stop locations along the IOS:

- N. King (Aala Park)
- Beretania Street (Aala Park)
- Chinatown
- Union Mall
- Bishop
- Alakea
- Aloha Tower
- Fort Armstrong

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- Coral
- Kewalo Basin
- Kamakee
- Ala Moana Park
- Hobron
- Fort DeRussy
- Saratoga
- Kalakaua/Seaside
- Kalakaua/Uluniu
- Kapahulu
- Kuhio/Liliuokalani
- Kuhio/Seaside

Connections between the IOS and circulator, local, and express buses will be provided at Aala Park, along Hotel Street in Downtown, at Ala Moana Center, and along Kuhio Avenue in Waikiki. The BRT stops will provide more amenities than the typical bus stop with 13-inch high raised platforms that provide level boarding to low-floor vehicles and covered waiting areas with amenities that may include seating, lighting, landscaping, and signs indicating the waiting time until the next vehicle. The entire IOS system will be designed in compliance with the Americans with Disabilities Act (ADA).

The major IOS construction elements of each roadway segment are described in the IOS Chapter of the 2003 FEIS. The improvements include construction of transit stops, concrete bus lanes, pavement rehabilitation, transit priority traffic signal improvements, roadway widening, landscaping, utility relocations, modifications to wheelchair ramps, sidewalks, and driveways, signage, striping, roadway lighting, and other work related to signal prioritization. In particular, new transit stop construction including a raised platform will be required on Bishop Street, Alakea Street, Aloha Tower Drive, Nimitz Highway/Ala Moana Boulevard, Ilalo Street, Auahi Street, Ala Moana Boulevard (near Hobron Lane), Kalia Road, Saratoga Road, Kalakaua Avenue, Kapahulu Avenue, and Kuhio Avenue. Roadway widening will occur on Ala Moana Boulevard (from Ala Wai Canal to Kalia Road) and on Kalia Road.

BASIS FOR DECISION

Of the three alternatives evaluated in the FEIS, the Refined LPA, which the IOS is a part, represents a major improvement over the No-Build and TSM Alternatives in meeting the project purposes and needs. The Refined LPA would substantially increase capacity of the transportation system in the primary transportation corridor by providing attractive alternatives to the private automobile, support desired development patterns, improve the transportation linkage between Kapolei and Honolulu's Urban Core, and improve the transportation linkages among communities in the Primary Urban Center.

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Of the three alternatives, the Refined LPA would do the most to better serve existing transit riders and attract people out of their autos. Because the Refined LPA would reduce automobile travel, congestion and regional air emissions would be less. Also, the electric buses that will be used on the In-Town BRT would generally be quieter than conventional diesel buses. The Refined LPA would provide transit patrons with travel time savings and would cause less motorist delay than either the TSM or No-Build Alternative.

The direct costs and level of some environmental impacts of the No-Build Alternative would be the least of all the alternatives studied, however travel delays, energy consumption, air pollutant emissions, and quality of life would be the worst.

Moreover, the No-Build Alternative would not adequately support the purposes and needs of the project. It would not provide a transportation system that would effectively handle present or future levels of travel demand. It would not even maintain current mobility levels. It would not develop attractive travel alternatives to the private automobile, encourage land use development in desired patterns, support implementation of an urban growth strategy that integrates land use and infrastructure planning, nor maintain the existing quality of life. It would only minimally increase the linkage between Kapolei and the Urban Core, and would not improve mobility within the Urban Core.

Compared to the No-Build Alternative, the TSM Alternative, with its emphasis on enhancing and restructuring bus service, would provide some support to the project's purposes and needs in terms of enhancing people-carrying capacity within the corridor. However, this alternative would not go far in providing an attractive alternative to the private automobile, nor in enhancing desired land use development patterns or the City's urban growth strategy that integrates land use and infrastructure planning. There would be some improvement in the linkage between Kapolei and the Urban Core, but it would not significantly improve mobility within the Urban Core.

Without the implementation of significant transit-oriented infrastructures, transit operation under the TSM Alternative would not be able to maintain current mobility levels.

The level of environmental impact would be greater than under the No-Build Alternative. This alternative would limit the use of an estimated 166 unrestricted parking spaces, mostly on King and Beretania Streets, and affect a number of loading zones. Travel delays would still be lengthy, and energy consumption and air pollutant emissions would increase.

There would be no relocations of businesses or residents with the Refined LPA, or the IOS. Partial displacements of driveways, parking and/or landscaping will be necessary.

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The IOS was selected as the first phase of the Refined LPA for construction. The IOS will be in place by 2006, and over time, the entire system will improve as more BRT components are subsequently added.

Among the reasons why the Iwilei-Waikiki IOS was selected as the first segment of the Refined LPA to be constructed are the following:

- It will reduce auto trips and improves pedestrian access on the island;
- It connects many existing major destinations and supports proposed development locations for new waterfront uses and for in-town living not presently well-served by transit;
- It minimizes street widening and utility relocations in comparison to the other In-Town BRT branches;
- Unlike the Regional BRT which requires phasing in conjunction with other HDOT planned H-1 improvements that are not ready to proceed yet, the Iwilei-Waikiki IOS can be implemented immediately; and
- It is viable as a stand-alone BRT route, as well as a building block for additional branches.

The IOS will help provide transportation connections between emerging redevelopment areas, such as Kakaako Makai, and other major activity locations along the IOS alignment. The Kakaako Makai area was selected as the site of the University of Hawaii Medical School and related facilities, which are currently under construction. Some of these areas are not currently served with direct transit linkages.

The IOS not only provides direct connecting service among these areas, but it will provide a higher level of schedule reliability due to priority treatments for the BRT service along the IOS alignment. Regular buses in mixed traffic – such as proposed in the No-Build and TSM Alternatives – cannot operate faster than other traffic and can be delayed depending on traffic conditions. In contrast, the BRT system, in semi-exclusive lanes and with the use of an advanced priority signal system, can operate with less interference from general traffic. Therefore, the resulting travel time savings and reliability of travel with such a BRT system are significant.

COMMENTS AND COORDINATION

Opportunity for public involvement in the Project that were provided by DTS are detailed in Appendix A of the federal FEIS. In addition, comments received on the federal FEIS are summarized below.

The federal FEIS includes responses to community comments received during circulation of the MIS/DEIS, SDEIS, and State FEIS. Seventy-nine (79) correspondences (letters and e-mails) were also received during circulation of the federal FEIS. One of these letters was from an elected federal official, two were from federal agencies, and 20 were

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from local elected officials and local agencies; the remainder were from organizations, businesses, and individuals.

Of the 79 correspondences, 31 indicated support for the IOS or the Primary Corridor Transportation Project as a whole; 29 wrote to indicate opposition to the IOS, some portion of the Refined LPA, or all of the Refined LPA; and 19 correspondences appeared to be neutral in tone, including two correspondences that were mixed. Many letters commented on more than one topic.

The following describes (1) the IOS comments and (2) the non-IOS or general comments.

IOS Comments

Twenty-eight (28) correspondences contained at least one substantive comment specifically on the IOS. The IOS-related comments in these correspondences are summarized below along with responses.

For purposes of brevity, the IOS comments provided in this section are organized by topic. The exceptions are comments from the following federal elected official and federal agencies:

- U.S. Senator Daniel K. Akaka expressed appreciation for receiving information about the project.
- Mr. Lawrence T. Yamamoto, State Conservationist of the Natural Resources Conservation Service of the U.S. Department of Agriculture, had no comments about the project.
- Mr. J. Bruce Turner, Assistant Hawaii Division Administrator of the Federal Highway Administration (FHWA), had one IOS related comment in which he states that it would not conflict with any ongoing projects of the FHWA. His other comments included stating that the FEIS contained no discussion regarding maintenance of traffic during construction; that the FHWA be involved in any discussion regarding use of the Interstate system, and that implementation of other elements of the Refined LPA may require a re-evaluation of the FEIS. In response, construction mitigation impacts on traffic in the IOS are discussed in Sections IOS.5.12. With regard to the non-IOS and IOS.5.12 portion of the project, these issues will be re-evaluated in supplemental environmental review and DTS will consult with FHWA and the Hawaii Department of Transportation.

Comment Topic 1 - Ms. Sandra S. Pfund, Interim Executive Director of the Hawaii Community Development Authority (HCDA), the State agency responsible for planning and development of 670 acres in the Kakaako district, and Mr. Eric G. Crispin, Director of the City Department of Planning and Permitting (DPP) requested that the project sponsor continue coordination with these agencies as the project proceeds to the design phase. In response, DTS has committed to FTA that it will continue coordination with these agencies during the final design phase on permitting and other design and construction issues.

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Comment Topic 2 - Ms. Doris Ching, Vice President for Student Affairs of the University of Hawaii, stated that the IOS will serve its medical school currently under construction in Kakaako.

Comment Topic 3 - Mr. Teney K. Takahashi, HCDA Director of Planning and Development stated that the IOS is consistent with the vision of Kakaako as a "gathering place." Mr. Takahashi identified recent, current and future developments that would benefit from implementation of the IOS.

Comment Topic 4 - Mr. Crispin, Director of DPP, asked that the project sponsors inform his department about construction schedules so they can be coordinated with current development projects along the IOS. In response, DTS has committed to FTA that it will continue to work closely with the DPP during final design of the IOS, especially since several permits from this agency will be required, such as a Waikiki Special District Use permit.

Comment Topic 5 - The Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board (NB) No. 5, Ms. Darci Evans, of the Hawaii Activities and Tours Association, Mr. Gareth K. Sakakika, Director of the Hawaii Transportation Association, Mr. Katsumi Tanaka, Chairman of the Board and Mr. Tom Dinell, FAICP of E Noa Corporation, and Mr. Lawson S. Teshima, Secretary-Treasurer Polynesian Hospitality stated their views that the IOS would compete with private transportation providers in Waikiki. In addition, NB No. 5, as well as Ms. Dale Evans, President of Charley's Taxi, stated that the IOS would disrupt transportation and delivery of goods in Waikiki through loading zone impacts. In response, Sections 5.1 and IOS.5.1 of the FEIS explain why the IOS will not have economic impacts to private transportation providers and Sections 4.6 and IOS.4.4 of the FEIS explain how loading zone conditions will not be significantly affected by the IOS.

Comment Topic 6 - Mr. John Lyles, President of American Land Company, Ltd., Mr. Troy Iwamoto, President of Roberts Hawaii, and Mr. Cliff Slater all questioned whether the costs and other impacts of the IOS were worth its benefits. In response, the IOS will save up to 10 minutes per trip compared to existing local bus routes that travel the same corridor. The IOS has been designed to avoid, minimize and mitigate any adverse impacts. Allocating funds for the IOS was a policy decision of the City Council made after weighing the costs, benefits, and impacts. FTA will rely on the local project selection process as a factor in funding the IOS. Inclusion in a federally approved State Transportation Improvement Program is an essential requirement.

Comment Topic 7 - NB No. 5 and Ms. Michelle Spalding Matson, Chair of the Kapiolani Park Advisory Council, stated that the IOS provides no parking provisions for commuters wishing to use the transit stop. Therefore, they are likely to use parking on trust property. In response, the Kapahulu IOS stop is a stop on the Waikiki loop, not a major transit terminal. Currently, Routes 2, 4, 8, 13, 22, 42, 58 and B all pass this location. There is little attempt to use the Waikiki Shell and Honolulu Zoo lots for commuter park-and-ride. The service provided by the IOS and the number of buses along Kapahulu Avenue will

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not change this condition. Also, the Honolulu Zoo and Waikiki Shell lots both have use restrictions and there is adequate parking available for park users during most non-peak and weekend hours. The IOS will increase access to Kapiolani Park and will not create a demand on the parking lots.

Comment Topic 8 - Council Chair Gary H. Okino, Mr. Wally Bachman of Citizens Advocating Responsible Education, and Ms. Daisy Murai had comments regarding the IOS being a demonstration of the In-Town BRT concept. Chair Okino disagreed with the decision to delay implementation of the exclusive lane on Ala Moana Boulevard and the semi-exclusive lanes on Kuhio Avenue. Whereas Mr. Bachman and Ms. Murai stated that the IOS is not based on an actual testing, and therefore, would be a poor demonstration of BRT. Ms. Murai further suggested that the City conduct a "test" of the IOS, duplicating the priority lanes of the IOS by coning, and if the IOS is the "test", then "fine tuning the project as problems arise is irresponsible." In response, proposed coning would not provide new information that cannot be determined through other means. In addition, some of the key elements of the IOS cannot be physically simulated, such as the widening of Ala Moana Boulevard and Kalia Road, the level boarding from raised platforms, or the signal priority. The IOS will serve as an adequate demonstration for people to judge the effects and benefits of the full In-Town BRT. Minor fine tuning is normal with any major project. However, there is no reason to expect major revisions.

Comment Topic 9 - Mr. Ernest K. Nishizaki, Executive Vice President & Chief Operating Officer of Kyo-ya Company Ltd., Mr. Frederick Orr, Managing Director of Sheraton Moana Surfrider and Princess Kaiulani Hotels, and Mr. Robert Rodman expressed concerns that the sidewalk extension on Kuhio Avenue and BRT vehicles operating on this street would cause traffic congestion. In response, the IOS project will not require any reduction in the number of lanes on Kuhio Avenue. The one lane reduction for Kuhio Avenue shown in Table IOS.2-1 in the FEIS reflects the lane distribution proposed by the Kuhio Avenue Improvements Project(a separate City project from the IOS) . However, current plans for the Kuhio Avenue Improvements Project indicate that two general purpose travel lanes in each direction on all of Kuhio Avenue will be maintained. Left-turn movements will be allowed from the two middle general purpose lanes. This configuration will permit existing functions to continue with no significant traffic impact. Lane widths adjacent to the BRT stops will be a minimum of 12feet wide.

Comment Topic 10 - Mr. Sakakida and Mr. Orr expressed concern about the narrowing of some through lanes to 10-foot widths and certain turning lanes to nine-foot widths in Waikiki. In response, there are many places along the IOS route with heavy truck and bus traffic that have 10-foot travel lanes and 9-foot turning lanes today, including portions of N. King Street, Beretania Street, Nimitz Highway, Alakea Street, Ala Moana Boulevard, Kapahulu Avenue and Kuhio Avenue.

Comment Topic 11 - E Noa Corporation and Mr. Orr expressed doubt that people will give up their automobiles in favor of the IOS. In response, a major modal shift is not expected or required for the IOS to be effective. However, some people will find it more

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convenient to use the BRT rather than drive when faced with the high cost of parking, and the time it takes to go back to their parking spot, travel to their destination and park again to go from one point along the IOS alignment to another.

Comment Topic 12 - Mr. Nishizaki and Mr. Rodman stated that the relatively frequent use of Kalakaua Avenue for parades and special events, such as block parties, were not addressed. In response, this issue was considered previously. Sections 4.8 and IOS.4.6 of the FEIS pointed out that BRT buses will be rerouted to Kuhio Avenue when activities prevent using Kalakaua Avenue.

Comment Topic 13 - NB No. 5, E Noa Corporation, Dr. Bennett and Ms. Daisy Murai questioned the selection of the alignment for the IOS. In response, Section IOS.1.1 of the FEIS disclosed the reasons for selecting the IOS alignment. Among these are that Waikiki is one of the largest destinations for workers and residents who will be the primary users of the IOS, and that the IOS will serve many travel destinations not currently well served by existing bus routes.

Comment Topic 14 - E Noa Corporation and Dr. Panos Prevedouros, a civil engineering professor at the University of Hawaii, questioned the project's traffic analysis for the IOS. E Noa stated that the analysis did not take into account "cumulative vehicle back-ups", and Dr. Prevedouros stated that the methodology selected is not state-of-the-art, and is not appropriate for the conditions found in the study area. In response to the E Noa comment, as was noted in Chapter 4 of the FEIS, the intersection traffic impact analyses provided in the FEIS did take into consideration cumulative downstream traffic congestion. In response to Dr. Prevedouros' comment, the macroscopic analysis technique utilizing the Highway Capacity Manual (HCM 2000) used in the FEIS is appropriate for the evaluation of alternatives and their relative traffic impacts. It was applied in conjuction with the officially adopted Oahu Metropolitan Planning Organization (OMPO) travel demand models that forecast future year regional traffic volumes, which are used for all highway and transit projects on Oahu. The abbreviated application of the microsimulation indicates that software such as INTEGRATION would require much more specific operational data. To properly calibrate a microsimulation analysis, parameters such as traffic queue length, traffic queue delay, vehicle travel time, and roadway geometry must be collected for each traffic movement at each intersection included in the model. Because of this data intensive requirement, microsimulation is more typically applied during final design or as a current year operational tool. The microsimulation technique presented by the commenter does not appear to take into consideration all of the proposed operational improvements included in the Refined LPA and its first operating segment, the IOS. For example, additional semi-exclusive lanes are part of the IOS, but they were not included in the commenter's microsimulation analysis. The added road capacity of the semi-exclusive lanes would not increase the delay as indicated in the simulation. Additionally, it is proposed that the predictive transit priority signal operation will be used to enhance the BRT operation. This type of signal operation is more sophisticated than a simple queue jumping as modeled in the commenter's analysis.

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Comment Topic 15 - State Representative Galen Fox, Councilmember Rod Tam, NB No. 5, Makiki-Lower Punchbowl-Tantalus Neighborhood Board No. 10, Ms. Evans, E Noa Corporation, and Mr. Orr claimed that additional traffic congestion would result from IOS priority lanes. Councilmember Tam also indicated that this congestion would hurt businesses. (It should be noted that Hotel Street is the only street in the IOS in Councilmember Tam's District that will have priority lanes, and it is already a bus only street for all but one block). In response, the IOS priority lanes will mostly be established by adding new lanes, such as on Ala Moana Boulevard, Kalia Road and on Kalaimoku Street; through the use of existing bus only lanes, such as on Hotel Street; and by the conversion of de facto semi-exclusive lanes, such as on Kalakaua Avenue. Therefore, additional traffic congestion is not anticipated, and access to businesses all along the IOS route will be maintained.

Comment Topic 16 - Ms. Murai and Mr. Slater stated that raised platforms of the transit stops along the IOS could endanger passengers and pedestrians who venture too close to the edge of the platform. Ms. Murai also stated that some of the IOS transit stops, such as those in or near downtown, Chinatown, Ala Moana Center and Waikiki would attract the homeless. Mr. Slater also expressed concern that the narrowing of lanes next to transit stops would endanger passengers standing too close to the edge of the platform. In response, each transit stop will include a two-foot wide tactile warning strip with signage along the boarding edge of the platform alerting passengers to stand behind the designated strip. In addition, as clearly indicated in the FEIS drawings, the travel lanes adjacent to the IOS transit stops will be a minimum of 12feet wide. Other non-curb traffic lanes and part of Ala Moana Boulevard will be reduced from 12 feet to 10 feet. This is not expected to cause a new safety issue since Ala Moana Boulevard currently includes 10-foot lanes in many sections, with no evidence of unsafe conditions. Enforcement against improper use of the transit stops is recognized as being required.

Comment Topic 17 - Ala Moana-Kakaako Neighborhood Board No. 11, E Noa Corporation, and Mr. Slater questioned the travel time savings of the IOS. NB No. 11 stated that the transit benefits of the IOS would be small, and that inappropriate comparisons were made, in particular that the analysis did not take into account Routes B and 2. In response, the IOS was compared to the local routes that use the same approximate alignment (i.e. the Ala Moana Boulevard corridor). Trips will be made to destinations all along the route not just from one end of the IOS to the other end. For example, common intermediate pairings are expected between Kakaako Makai (UH Medical School) to Downtown and to Waikiki, which serve the project objectives. The travel time comparison in the FEIS is a more representative comparison of the options that most IOS users will have than comparing the IOS to Routes B and 2, which have different routings using the King-Beretania couple. The IOS is projected to save up to 10 minutes per trip for users compared to the local routes (Routes 19, 20, and 42) that travel in the same makai corridor. Even if we compared the IOS to Route B the travel time would be less via the IOS than with Route B between the two closest end points in common, Chinatown and Kapiolani Park in Waikiki. The total travel time on Route B with the average wait time would be 29.5 minutes versus the 28 minutes for the IOS from Aala Park to Kapiolani Park. The IOS to Route B comparison of total travel time is 1.5

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minutes shorter. In summary and most importantly, the IOS provides direct transit linkages to and from Kakaako Makai, which currently does not have such service, thus satisfying a project objective.

Comment Topic 18 - NB No. 5 and Mr. Rodman commented on tree and landscaping impacts. NB No. 5 asked why the FEIS did not disclose potential impacts to the historic monkeypod trees on Kapahulu Avenue. In response, other than pruning, these trees will not be affected by the IOS. Mr. Rodman stated that the IOS would destroy the Ala Moana Boulevard landscaped median, which is virtually the only landscaping in this area after years of high-density development. In response, Sections 5.7 and IOS.5.7 of the FEIS addressed the impacts to the landscaped median. Although some of the median will be reduced in width on Ala Moana Boulevard between Holomoana Street and Kalia Road as part of the IOS, new landscaping will be added to the remaining median to preserve it as a scenic gateway into Waikiki.

Comment Topic 19 - Councilmember Rod Tam, Chair of Kapiolani Park Trust, NB No. 5, and Ms. Matson warned of the possibility that the Kapahulu Transit Stop would encroach upon Kapiolani Park Trust property. If the transit stop were within park property, Councilmember Tam and Ms. Matson questioned whether it would be a valid use in accordance with a 1991 Court ruling that the park be only used for recreational purposes. In response, both the City Corporation Counsel and State Attorney General have reviewed the ownership of the property proposed for the Kapahulu transit stop and have concluded that it is City owned, not Trust land. The reason for locating the transit stop on Kapahulu Avenue adjacent to Kapiolani Park and Honolulu Zoo is to further encourage people to use transit to travel to these major recreational destinations. The transit stop therefore supports the goal of the Trust to encourage recreational use of the Park.

Comment Topic 20 - NB No. 5, Mr. Nishizaki and Mr. Orr stated that the BRT vehicles using Kalakaua Avenue and transit stops on Kalakaua Avenue would visually intrude upon shoreline views. NB No. 5 stated that they would adversely affect the "Hawaiian Sense of Place", and would reduce sidewalk space for pedestrians. Nishizaki and Mr. Orr stated the transit stops would adversely affect recent beautification and pedestrian improvements made by the City. In response, Sections 5.4 and IOS.5.4 of the FEIS discussed the visual impacts of the IOS. As noted in these sections, special care will be taken in the design of the two transit stops on Kalakaua Avenue to preserve important viewplanes and to blend in with the surrounding environment. Pedestrian activities on Kalakaua Avenue will not be affected because the Seaside transit stop will be constructed between the curb and landscaped planting strip, and the Uluniu stop contains ample sidewalk space for both pedestrians and waiting passengers.

Comment Topic 21 - NB No. 5 believed that the city would dedicate exclusive and semi-exclusive BRT lanes within the IOS alignment a few years after initial implementation. Along with signal prioritization, this would compound traffic congestion. In response, the FEIS disclosed that development of the Refined LPA would be phased over 14 or

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more years, and that the IOS is the first segment of the larger project. Section 4.4 of the FEIS describes the traffic impact analyses at full completion of the Refined LPA.

Comment Topic 22 - NB. No. 5 doubted that BRT users could be served on Kalakaua Avenue without being adversely impacted by other traffic. In response, BRT vehicles will be able to leave the priority lanes to go around any blockages of the priority lanes.

Comment Topic 23 - NB No. 5 questioned whether the State of Hawaii would dedicate its roadway right-of-way at various locations along the IOS for BRT. In response, special agreements with the State of Hawaii or rededication of right-of-way are not required for the IOS since the BRT will not effect current operation of mixed traffic on State-owned roadways.

Comment Topic 24 - NB No. 5 commented that the reason the IOS was selected is because the City is intent on a "complete construction make-over of Honolulu," and wants to support the proposed PUC-DP and the Waikiki Livable Community Plan. In response, the IOS is supportive of and consistent with planned development, including the PUC-DP and the Waikiki Livable Community Plan if they are approved by the City Council. These plans will require increases in more environmentally sensitive transportation capacity and service.

Comment Topic 25 - NB No. 5 stated that the FEIS was deficient in not disclosing impacts to two historic properties near the IOS alignment, Irwin Park and Aloha Tower. In response, as stated in Sections 3.10 and IOS.5.10, both historic properties are not within the Area of Potential Effect as was determined in consultation with the State Historic Preservation officer. The Aloha Tower Transit Stop will be adjacent to the Maritime Museum.

Comment Topic 26 - NB. No. 5 recommended "smaller, environmentally-friendly vehicles and readily accessible transit stops" in Waikiki and surrounding communities. In response, the BRT is only one element in the City's transit improvement program. As part of the hub-and-spoke element the City is installing smaller circulator buses to complement the rest of the family of vehicles in the City's bus fleet. The sizes of vehicles used are matched to the type of service and ridership level on the routes they are deployed.

Comment Topic 27 - NB. No 5 stated that the cost estimates provided in the FEIS are understated because of "add-on factors" described in the IOS section. In response, the add-on factors referred to in the capital cost section of the FEIS are not cost overruns. They are normal allowances for design, construction administration and contingencies.

Comment Topic 28 - NB. No 5 stated that City general and special funds have been used for the IOS. In response, the local funding source for constructing the IOS is the City's Highway Improvement Bond Fund.

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Comment Topic 29 - NB No. 10 stated that the IOS should have been compared with the TSM Alternative in addition to the No-Build Alternative. In response, the IOS is the initial phase of the Refined LPA. The FEIS compared the Refined LPA with the TSM Alternative for the design year of 2025, leading to the City's decision to proceed with implementation of the Refined LPA over time. The IOS is a first phase toward implementing the Refined LPA, starting in 2006. A comparison between the IOS and the TSM Alternative would not have been meaningful in this context.

Comment Topic 30 - E Noa Corporation requested that the City consult with Professor Prevedouros of the UH Civil Engineering Department to analyze traffic impacts on Ala Moana Boulevard. In response, the IOS is not anticipated to cause added delay to motorists on Ala Moana Boulevard because BRT vehicles will operate in mixed traffic with no changes in roadway configuration on the section analyzed by Dr. Prevedouros.

Comment Topic 31 - E Noa Corporation stated that the reduction of general purpose lanes on Kalakaua Avenue from four to three would contribute to congestion. In response, the IOS will designate the existing curb lane on Kalakaua Avenue between Saratoga Road and Uluniu Avenue as a semi-exclusive lane, which will be available for other private transit vehicles, and vehicles turning right. The de facto usage of the existing curb lane is similar to what is proposed for the IOS plan. Therefore, the impact of the IOS will be the introduction of between six to ten BRT vehicles per hour to this lane, which is not projected to have a significant impact on operations in this lane or with Kalakaua Avenue as a whole.

Comment Topic 32 - Mr. Teshima commented that it is the intention of the City to worsen traffic congestion in Waikiki so that people will use BRT. In response, little delay to motorists is anticipated with the IOS as compared to the No-Build condition. However, transit riders will benefit since service will be improved between Aala Park and Waikiki via the Ala Moana corridor.

Comment Topic 33 - Mr. Teshima questioned why the City would be committing to building and operating the IOS when the City has difficulty financially supporting the current bus system. In response, the matter of affordability is for the City Council to decide. In September 2003, the Council chose to raise bus fares and to keep current levels of service. Further, annual system-wide operations and maintenance costs will be less with the IOS than under the No-Build condition since the IOS will replace some local bus service.

Comment Topic 34 - Mr. Orr commented that the reduction in regular bus service in Waikiki under the IOS is much less than the projected reduction of bus service under the Refined LPA. In response, the IOS is the first phase of the larger Refined LPA. As such, the benefits will be proportional.

Comment Topic 35 - Ms. Murai questioned how the 2003 City Budget can include $31.1 million to start the first phase of the Refined LPA when the federal share of $20 million has not yet been allocated. In response, the federal funding has been appropriated by

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Congress and a grant application for funding could be made after issuance of this ROD and compliance with FTA grant requirements including inclusion into a federally approved State Transportation Improvement Program.

Comment Topic 36 - Ms. Murai questioned whether adequate engineering was conducted on the height, width, turning and other requirements of large vehicles, such as buses, semi-trucks, etc. In response, preliminary engineering and field verifications were conducted, which took into account the roadway characteristics and dimensions (e.g., width including mirrors, turning radii, etc.) of large vehicles, such as BRT vehicles, tour buses and large trucks.

Comment Topic 37 - Ms. Murai stated that the high-density Outrigger and other Waikiki projects, which would establish gathering places for recreational and cultural activities, would not be served well by the IOS. In response, improvements to public transit, such as what is being provided by the IOS, are supportive of high-density land uses, and recreational and cultural activities that draw many people.

Comment Topic 38 - Ms. Murai stated that the IOS would decrease bus service between Waikiki and other west Honolulu areas, such as the Airport, Hickam Air Force Base, the Arizona Memorial, Aloha Stadium and Pearlridge Shopping Center. In response, the existing bus system will remain largely in place with the IOS. The areas mentioned would continue to be served by the routes that serve them today. Only Route 8, which operates between Ala Moana Center and Waikiki, will be eliminated since it would be redundant with the IOS in place.

Comment Topic 39 - Mr. Rodman asked how emergency vehicles will navigate through Waikiki with the IOS. In response, the IOS will increase the number of lanes usable by emergency vehicles on certain segments of Ala Moana Boulevard and Kalia Road. On other streets, the number of lanes usable by emergency vehicles would be the same under the IOS as the No-Build condition.

Comment Topic 40 - Mr. Slater stated that the City and the FTA should make it clear that they have only accepted the IOS portion and that any further development of the Refined LPA would need a Supplementary EIS. In response, the FEIS disclosed that this ROD is only for the IOS. The form of the supplemental environmental review needed (for other elements of the Refined LPA) will be determined by FTA prior to implementation of these elements.

Comment Topic 41 - Mr. Slater's letter included a memorandum from Ms. Donna Y.L. Leong and Mr. Elijah Yip of the law firm, Cades-Schutte, which had several comments (as follows in *italics*) regarding the IOS:

1. *The IOS was not identified in the State FEIS, and therefore, is a violation of the State EIS.* The purpose of this ROD is to only address federal National Environmental Policy Act Requirements. Compliance with Chapter 343 is a matter of state law and not the purpose of this action.

2. *The IOS was not adequately exposed to public review and comment, and a supplemental DEIS should have been prepared specifically for the IOS.* In response, in May 2002, the Honolulu City Council selected the Iwilei-Waikiki segment as the Initial Operating Segment when it appropriated funding for the IOS in the Fiscal Year (FY) 2003 Capital Improvement Program (CIP) budget. Their decision followed a widely publicized series of Council meetings on March 13, April 17, May 16 and May 29, 2002 and a public hearing on April 24, 2002, that were well attended and included extensive testimony and questions. The selection of the Iwilei-Waikiki segment as the IOS was again confirmed in June 2002, after additional Council meetings on April 24, May 14, and June 4, 2002 and a public hearing on May 29, 2002, when the City Council amended the Primary Urban Center Development Plan Public Facilities Map to incorporate the Iwilei-Waikiki segment improvements. City and FTA have allowed public comments on the FEIS to be part of FTA's consideration in deciding whether to issue this ROD.
3. *Asserted that the IOS is a "separate" project, and therefore, claimed the FEIS failed to consider the cumulative impact of the larger Refined LPA and improperly segmented the Refined LPA.* In response to the cumulative impact comment, the impact chapters of the FEIS document the projected cumulative impacts of the entire Refined LPA, as well as the impacts of the IOS. The reason for only proceeding with the IOS at this time is because of funding. It was never the intent to implement the entire Refined LPA all at once as stated in the phasing program discussed in Chapter 2. In response to the segmentation comment, proceeding with the IOS at this time is not considered segmentation because the proposed Refined LPA was fully described in the FEIS. Phasing a large project is not considered segmentation if the larger project is fully described and disclosed to the public in the environmental review document; and, the initial segment has logical termini, has independent utility, and does not restrict consideration of alternatives for other reasonably foreseeable transportation improvements.
4. *The construction of the IOS would foreclose other reasonably foreseeable transportation improvements.* In response, the IOS will not preclude significant transportation improvements in the future if desired by the community.

Non-IOS Comments

The remaining comments were deemed not to pertain to the IOS. A summary of the non-IOS comments is provided below and individual responses to these non-IOS comments are not provided in this ROD since supplemental environmental review will occur prior to.

Topics of comments in opposition to project:

The commenters who expressed opposition to the Refined LPA collectively provided several reasons for their critical view of the Refined LPA as a whole or certain elements of the BRT project not associated with the IOS. Chiefly among these reasons are potential traffic impacts of the In-Town BRT(19 comments); the financial implications or cost of the project (16 comments); belief that the Refined LPA will result in little improvement in transit service (15 comments); and disagreement with what is being

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proposed to address the objectives of the project (10 comments). Again, it should be noted that many correspondences addressed more than one comment topic.

Some commenters objected to the use of BRT exclusive and semi-exclusive lanes on certain streets in the Refined LPA , such as Dillingham and Kapiolani Boulevards, because they believe that such changes will make traffic conditions worse for other roadway users, such as private automobiles and commercial trucking. Some claimed that this impact would adversely impact businesses and certain neighborhoods because additional traffic would overflow onto side streets. In addition, some project critics said that the City did not take into account the traffic impacts of major planned developments, such as Walmart/Sam's Club near Kapiolani Boulevard.

In terms of financing, some commenters opposed to the Refined LPA said that the overall project is too costly, and would be a financial burden to the City in the future, from the standpoint of operations and maintenance (O&M) expenses. Some questioned how the City could afford the project given recent budget difficulties and other public needs, such as road repairs. Some commenters said that the overall cost has been underestimated, particularly O&M and the cost for the BRT vehicles.

Some commenters questioned the FEIS projections that had some motorists switching from using their own cars to BRT because they claimed that the analysis ignored market forces that favor private automobiles, and that BRT would not provide enough savings in travel time to attract new transit riders. Some of the commenters stated that transit ridership in Honolulu has declined due to varying reasons.

Finally, some commenters in opposition provided suggestions or alternatives to the Refined LPA, such as implementing the TSM Alternative, expanding express bus service, re-organizing the existing bus routes, increasing road capacity, and improving traffic management. Some commenters suggested project modifications, such as eliminating raised platforms at transit stops, eliminating the use of semi-exclusive BRT lanes in favor of exclusive BRT lanes, implementing the Regional BRT first, and eliminating the UH Manoa branch from the project.

Other topics raised by commenters critical of the project include the following:

- Construction Impacts (1)
- Development Plan Consistency (1)
- Economic Impacts (3)
- Environmental Review Process (4)
- General Environmental Impacts (5)
- Land Use Impacts (1)
- Parking Impacts (1)
- Plan Consistency (3)
- Public Involvement and Coordination (4)
- Social Impacts (1)
- Traffic and Public Safety (5)
- Traffic or Parking Impacts (3)

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- Traffic Simulations or Testing (5)
- Tree Impacts (1)
- Trucking/Visitor Transportation Industry Impacts (5)
- Visual/Aesthetic Impacts (2)

Topics of neutral comments

The most common topic from commenters who appeared neutral or did not provide statements of support or opposition to the Refined LPA is related to project definition (6 comments). This includes comments relating to development of the Middle Street parking structure, and requesting that left turns be allowed at selected intersections on Dillingham Boulevard. Other comments that appeared neutral to the project suggested that BRT be the start of a fixed rail transit system.

Other topics raised by neutral commenters include the following:
- Construction Impacts (2)
- Environmental Review Process (2)
- Financial Impacts (1)
- General or Not Relating to the Project or its Impacts (3)
- General Environmental Impacts (2)
- Public Involvement and Coordination (1)
- Right-of-way (1)
- Traffic or Parking Impacts (1)
- Traffic Simulations or Testing (1)
- Tree Impacts (2)
- Plan Consistency (2)
- Visual/Aesthetic Impacts (1)

Comments in favor

The following commenters expressed support for the IOS and/or Refined LPA:
- Hawaii Community Development Authority
- University of Hawaii
- Donn Takaki, Transportation Commission Chair
- American Council of Engineering Companies of Hawaii
- American Public Works Association, Hawaii Chapter
- Hawaii Bicycling League
- Hawaii Building and Construction Trades Council, AFL-CIO
- Honolulu Board of Realtors
- Oahu Visitors Bureau
- The Outdoor Circle
- Waikiki Improvement Association
- Hawaiian Hospitality Institute
- WESLIN Consulting Services
- Wimberly Allison Tong & Goo
- Jeb P. Brown
- Hui-Pang Chen
- Zam Louie P. Criste
- Dexter S. Eji
- Melvin Ing
- Jodi Javonillo
- Michael Jones
- Robin Kasamoto
- Hirofumi Katsuno

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- Donald Lee
- LCDR Wes Phillips, USN
- Tom Schnell, AICP
- Perry M. Small
- Toshi Takata
- Corinne Tam
- Brian Uy
- Ryan K. Yoshimura
- Stanford Yuen

Some of these commenters provided common statements that BRT would upgrade the City's bus transit system, making it convenient for current bus riders as well as encouraging others to use transit. Some of the commenters stated that the BRT would help alleviate traffic congestion, and would support planned development.

MEASURES TO MINIMIZE HARM

Through the process of developing and evaluating alternatives and coordinating with the public and other stakeholders, DTS and FTA made considerable effort to incorporate measures to minimize the Project's potential social, economic, and environmental impacts. The mitigation measures for the Project presented in the 2003 federal FEIS are now firm mitigation commitments, as summarized in the Mitigation Monitoring Plan in Attachment A. DTS shall implement (or cause to be implemented) all mitigation measures provided in the 2003 federal FEIS and described in the Mitigation Monitoring Plan (Attachment A). DTS shall also require that all contractors comply with the Mitigation Monitoring Plan. FTA shall require as a condition of any grant or grant agreement with DTS that all committed mitigation measures be implemented. DTS shall submit written reports on a quarterly basis to FTA and/or its designee(s) on the mitigation implementation. FTA will monitor DTS compliance as part of its project management oversight program and processes for the Project. Any change to the mitigation program that becomes necessary must be approved by FTA in advance, and may, at FTA's discretion, necessitate additional environmental review and documentation in accordance with FTA's environmental regulation at 23 CFR Part 771.

FTA DETERMINATIONS AND FINDINGS

Environmental Protection (49 USC Section 5301(e) and 5324(b))

The environmental record for the Project is included in the previously referenced documents for the Primary Corridor Transportation Project, which consists of the 2000 MIS/DEIS, 2002 SDEIS, 2002 State FEIS, and the 2003 federal FEIS, and all attachments thereto. Cumulatively, these documents represent the detailed statement required by both NEPA and the Federal Transit Laws, 49 USC Sections 5301(e) and 5324(b), regarding the environmental impacts of the proposed Project.

On the basis of the evaluation of social, economic, and environmental impacts as presented in the FEIS, the Mitigation Monitoring Plan, and the written and oral comments offered by the public and other agencies, FTA has determined, in accordance with 49 USC 5324(b), that:

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1. An adequate opportunity was afforded for the presentation of views by all parties with a significant economic, social, or environmental interest in the Project;

2. Fair consideration has been given to the preservation and enhancement of the environment and to the interest of the community in which the proposed Project is to be located; and

3. No feasible and prudent alternative to the adverse environmental effects exist and all reasonable steps have been taken to minimize any such effects.

The extensive opportunities provided for public and other stakeholder involvement in Project planning and decision-making are described in Appendix A of the FEIS. The reasonable steps to minimize adverse environmental impacts are described in the IOS Chapter and in Chapter 5 of the FEIS, and are summarized in Attachment A of this ROD.

Historical and Archaeological Resources

The Section 106 Memorandum of Agreement (MOA) addresses the entire PCTP Refined LPA. In the MOA, the Hawaii State Historic Preservation Officer (SHPO) determined that the Refined LPA will have adverse effects on historic sites that are listed or potentially eligible for listing on the National Register of Historic Places (NRHP). Of those sites, only two are affected by the Project that is the subject of this ROD. Development of the Alakea and Saratoga Transit Stops may adversely affect lava rock curbs, which are considered historic by the State Historic Preservation Division (SHPD), because the lava rock curbs will be temporarily removed during construction. DTS will reuse the lava rock curb material in the design of those BRT stops.

The SHPO and the FTA entered into a MOA in July 2003 that stipulates the measures to be taken to minimize or mitigate impacts to historic and archaeological resources that will be adversely affected by the Project. DTS is a concurring party to the MOA. A copy of the MOA is included in Appendix A of the 2003 federal FEIS, and is included in this ROD as Attachment B.

Conformity with Air Quality Plans

The federal Clean Air Act (CAA), as amended, requires that transportation projects conform with the State Implementation Plan's (SIP) purpose of eliminating or reducing the severity and number of violations of the national Ambient Air Quality Standards (AAQS) and of achieving expeditious attainment of such standards. Hawaii's SIP is outlined in Hawaii Administrative Rules 11-60.1, Air Pollution Control rules, which specifies more stringent State AAQS. The EPA regulation implementing this provision of the CAA (40 CFR Part 93) establishes criteria for demonstrating that a transportation project conforms to applicable air quality plans.

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In order to demonstrate conformity with the federally approved SIP, as required by EPA conformity regulations, the Project must satisfy a number of regulatory conditions established in the federal regulations. The federal FEIS provides documentation (Sections 3.5, 5.5, and IOS.5.5) that the proposed Project satisfies all such conditions.

The Regional and In-Town BRT, of which the IOS is a part, are included in the Oahu regional transportation plan (TOP 2025). The Oahu Metropolitan Planning Organization adopted the TOP 2025 on April 6, 2001. The projects listed in the TOP 2025 have been evaluated for regional effects. The PCTP is also included in the Statewide Transportation Improvement Program for Fiscal Years 2000-2002, approved in September 2001. As a result, this project is in conformance with the SIP. Oahu is a region that meets the standards for all national AAQS.

Section 4(f) Determination

Section 4(f) of the Department of Transportation (DOT) Act of 1966 (49 USC 303) affords special protection to parks, recreation areas, wildlife refuges, and historic sites, by prohibiting use of such properties for a transportation project unless there is no feasible and prudent alternative to such use and the project includes all possible planning to minimize the harm to the protected resource.

The Section 4(f) evaluation in Chapter 5 of the FEIS indicates that no Section 4(f) resource will be affected by the Project.

Floodplain Finding

DOT Order 5620.2 implements Executive Order 11988, "Floodplain Management and Protection." These orders state that FTA may not approve an alternative involving a significant encroachment unless FTA can make a finding that the proposed significant encroachment is the only practicable alternative. The major purposes of Executive Order 11988 are to avoid Federal support for floodplain development, to prevent uneconomic, hazardous, or incompatible use of support for floodplains; to restore and preserve the natural and beneficial floodplain values; and to be consistent with the standards and criteria of the National Flood Insurance Program (NFIP).

Based on a review of the Federal Emergency Management Agency (FEMA) maps, several areas along the Project alignment fall within the 100- or 500-year base floodplains, such as Ala Moana Regional Park, Ala Moana Center, and portions of Waikiki.

Although portions of the proposed IOS alignment are within floodplains, development of the system will largely be limited to areas within or near existing roadways and do not involve the types of changes that would affect floodplains or the potential for flooding. In other words, implementation of the project will result in only minimal encroachment

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on the floodplain and no changes to existing flood elevation levels, nor will it increase the risk of floods. Therefore, the project is in compliance with U.S. DOT Order 5620.2.

Any required construction will comply with the rules and regulations of the NFIP, and all applicable ordinances for flood hazard districts, as stated in the City and County of Honolulu's Land Use Ordinance.

Wetlands Finding

Presidential Executive Order 11990, "Protection of Wetlands," directs federal agencies to avoid to the extent possible the long- and short-term adverse impacts associated with the destruction or modification of wetland and to avoid direct or indirect support of new construction in wetlands wherever there is a practicable alternative.

The Project will not affect any known wetlands. There appears to be no wetlands along the proposed Project alignment, which traverses a highly urbanized environment. Streams occurring in the corridor are hardened, and the IOS will operate along existing roadways.

Environmental Justice

Executive Order 12898, "Federal Action to Address Environmental Justice in Minority Populations and Low-Income Populations" (February 11, 1994), provides, in part, that FTA identify and address "disproportionately high and adverse human health or environmental effects" of federally-funded mass transit projects on minority populations and low-income populations (EJ populations), and that FTA "conduct its programs, policies, and activities in a manner that ensures that such programs, policies, and activities do not have the effect of subjecting persons...to discrimination...because of their race, color, or national origin."

As discussed in Chapter 5 and the IOS Chapter of the FEIS, FTA and DTS identified two minority and low-income populations within the Project service area: Kalihi-Palama and Chinatown. DTS conducted extensive public participation activities for the PCTP, including meetings held in identified EJ neighborhoods. The Project is not anticipated to cause disproportionately high and adverse health or environmental effects on these two minority and low-income populations. On the contrary, the IOS will provide improved transit service for these neighborhoods without causing them to be divided or isolated from the greater community. In addition, the IOS will not create health risks, such as traffic safety hazards, for these populations out of proportion with such risks to other populations or groups in the corridor.

SUMMARY NEPA FINDING

FTA recognizes that the Primary Corridor Transportation Project has generated a great amount of interest by residents on the island of Oahu. The issuance of this Record of

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Decision by FTA is not the final step in determining whether the project will be built. The local funds programming process is a major factor in whether funds for this project will be committed in a State Transportation Improvement Program for the project

On the basis of the determinations made in compliance with relevant portions of federal law, the FTA finds that the IOS, as described in the federal FEIS, including the mitigation measures identified therein and summarized herein as Appendices A and B, satisfies the requirements of the National Environmental Policy Act of 1969, 49 USC 5301(e) and 5324(b), the National Historic Preservation Act of 1966, the Clean Air Act of 1970, and the Department of Transportation Act of 1966, all as amended. Furthermore, the Project complies with Executive Orders 12898 and 13045.

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Leslie T. Rogers
Regional Administrator
Federal Transit Administration
Region IX

Date

AR00152059