Honolulu Primary Corridor Transportation Project
MIS/DEIS
Administrative Draft
June 23, 2000
TPL Comments

General Comments

The alternative of a tunnel under Kalihi Channel becomes needs to be evaluated for environmental impacts. Information on what the COE and HDOT review is analyzing, as well as the general impacts of a tunnel – turbidity, species in the area, etc. – that would be affected needs to be addressed.

The data and information in the document do not fully support the transportation purpose and need given. The transportation problem needs to be clearly defined and the transportation data needs to support that problem. Most significantly, information on Sand Island and the need for a transportation linkage is not provided. How will the SISP reduce congestion on Nimitz Highway/Boulevard? I.e. what trips will be captured? Will there be induced travel on SISP? What did the sensitivity analysis show regarding toll fees? If there are no tolls, what would be the options for paying for this alternative?

It is unclear how the BRT/SISP alternative was derived.

Why is the option of not having a toll road not explored?

The impact of the BRT/SISP alternative with regards to reduced road capacity on Nimitz Boulevard is not addressed throughout the document.

Does FHWA have a cost-effectiveness type evaluation that may aid in comparing alternatives since the BRT/SISP Alternative is about 50% a non-transit roadway project?

Was a sensitivity analysis done of tolls versus time saved? The financial section does not make clear whether an analysis of this project was done and the transportation impacts does not address what the congestion differences due to mode share would be depending on the tolls.

The travel times between the alternatives only address transit time and BRT and BRT/SISP are the same. The automobile travel time is relevant as well as transfer time from transit since the service varies between these two alternatives.

The Section 4(f) section needs significantly more information.

The BRT alternative provides a dramatic increase in transit service than the BRT/SISP alternative (72% versus 28% increase over 1997 levels, and the TSM is 27 %), but the

O&M costs for the transit portion of these two alternatives does not differ significantly. The document does not explain the reason for the difference.

It is not clear in the sections other than Chapter 6, that the BRT/SISP Alternative cost estimate does not include O&M costs of the tunnel and revenue bond debt service. All costs of the alternatives should be addressed in the cost estimate since they are all borne by the public.

It is not clear in the summary sections that the BRT Alternative includes a large high-occupancy vehicle component. Does the public in Hawaii know that a zipper lane is an HOV lane?

Nowhere in the document are existing and proposed HOV routes and priority bus lanes shown together to portray bus operations.

The water impacts are only generally evaluated. See specific comments regarding surface water, ecosystems, etc.

Appendices showing relevant correspondence with agencies is needed.

For those that may be unfamiliar with the terms Ewa, Koko Head, mauka, makai, etc., they should be defined early in the document and preferably the executive summary, i.e. before Chapter 3.

Often acronyms are not defined prior to their use.

There should be consistent numbering systems for every section of the document.

Specific Comments

Executive Summary

All the alternatives do not meet the purpose and need statement.

S.3.1 Transportation Impacts: a comparison between all alternatives should be provided. I.e., BRT and BRT/SISP Alternatives should be compared in relation to each other and not stated as both "could accommodate even further increases in travel demand", etc.

The analysis that shows that 41% of the traffic on Nimitz Boulevard would be redirected to SISP is not provided in more detail in the rest of the document to fully evaluate this alternative.

S.3.3 Mitigation Commitments: this section should be expanded in more detail.

S.4 Financial Analysis: given varying levels of funds from various sources, what is the type of impact, e.g. what transportation projects will likely be delayed, deferred, etc?

S.5.2 Environmental/Socioeconomic Equity and Benefit: are there mobility differences among the alternatives with respect to low-income and minority populations and transit service level variations?

S.7 Issues for Future Consideration: the statement that "the application of individual priorities and value judgments" by decision makers in choosing an LPA does not make clear that they are representing the public in choosing an LPA and that public input, including this EIS and comments on it, are part of that decision making process.

A table showing the impacts of each alternative and proposed mitigation would be useful.

Chapter 1.0 Purpose and Need

1.1 Purpose: the rest of the document does not fully the need for connecting Sand Island.

1.1 Purpose: the three prime goals identified in the Islandwide Mobility Concept Plan do not fully support the five project goals. What public involvement and technical analysis support the specific goals of #4 and #5? The primary purpose of the project is transportation related, planning goals are secondary and should be supported by transportation, and not the purpose itself.

1.2 Need for Transportation Improvements: the areas described in the Existing Land Use sub-section should be identified on a map, e.g. Kalihi-Palama, Kaimuki, Waipahu, Kunia, etc. A summary of the Central Oahu Development Plan draft would be useful. Since Sand Island is a significant portion of the BRT/SISP alternative, information and figures related directly to the Island portion of the Urban Core regarding existing and future land use would aid in comparing alternatives.

1.2.2 Existing Transportation Facilities and Services in the Corridor: a diagram showing the roadways, bus routes, bikepaths, maintenance facility locations, etc. would be useful.

1.2.3 Measures of Transportation System Performance: it would be useful to have graphics in this section to show areas and levels of congestion within the corridor. How will the SISP aid in reducing congestion on Nimitz Highway/Boulevard? I.e., what trips will be captured.

Table 1.3-1 Local and State Transportation Goals and Objectives from Adopted Plans: these goals and objectives, and the goals in the Islandwide Mobility Concept Plan that resulted from the public process, do not fully support the project goals and objectives.

1.3.2 Oahu Trans 2K Public Outreach Planning Process: the only mention of the Sand Island Scenic Parkway is one sentence regarding it's discussion in the fourth round of

public meetings: "Sand Island Scenic Parkway was also discussed." What was the public input regarding this alternative? How does this alternative result from the previous studies and the first three rounds of public meetings? See additional comments for Appendix A, Coordination and Consultation.

Chapter 2.0 Alternatives Considered

It would be useful if all street names referenced in the text were also shown on the figures.

2.1 Evolution of the Alternatives Carried Forward: how did the BRT/SISP alternative evolve?

2.2.1 No-Build Alternative: It is unclear what is part of the existing transportation network and what is proposed. E.g., Figure 2.2-1, indicates that only two Park-and-Rides are part of this alternative and the text describes roadway projects and other transit projects. No current figures are provided for the public to fully evaluate what transportation projects are included in the no-build alternative.

2.2.2 Transportation System Management (TSM) Alternative: the mitigation measures section should be expanded to include the information provided in other sections regarding the no-build alternative.

2.2.3 Bus Rapid Transit (BRT) Alternatives: the regional element of this alternative includes a significant HOV component that until reading this detailed information is not readily understood. (Is the term "zipper lane" understood to be HOV by the public in Hawaii?) Perhaps the name of the alternative should be changed to include the idea of additional automobile capacity. At a minimum, this aspect of the alternative needs to be better explained in the Executive Summary and Chapter 1.

Is the third maintenance facility needed under this alternative covered by this EIS? There is an LPA already…it is not clear. Page 2-20, "options to be explored more fully in the future."

2.2.4 BRT/Sand Island Scenic Parkway (SISP) Alternative: it is unclear why replacing the bridge over Kalihi Channel is proposed "to advance the environmental review process of this project". If a tunnel may be constructed, this option needs to be evaluated in the EIS. The text does not note or address why there are two additional transit centers (one community and one neighborhood center) listed in Table 2.2-9 for the BRT/SISP alternative than for the BRT alternative. If the number of transit centers is different under these alternatives, this fact needs to be more prominently discussed in the EIS.

Figure 2.2-11 Immersed Tunnel Section: adding vertical dimensions to this figure would be useful.

Under mitigation measures for the BRT/SISP alternative, it should be noted that under Option B, displacements would be mitigated by relocation benefits.

2.4 Operating and Maintenance Costs

- The first sentence states that Handi-Van costs are included and the last sentence on page 2-50 says they are not included. Which is it and if the costs are not included, why are they not?
- Why was the vanpool program assumed to be a break-even operation? It is currently not. Private market factors may evolve to assume carpool and vanpool costs; what analysis was done to determine the future use of the HOV lanes and the resulting cost implications?
- What cost estimation methodology was used to determine the O&M for the SISP and HOV sections of the alternative? I.e., the interchange, road, bridge, tunnel, and toll upkeep? Since highway O&M is best looked at over a longer period of time (versus a forecast year of 2005), a period that includes the first major overhaul of the bridges, road, and tunnel, and then annualized would better represent the O&M of the alternatives.
- There needs to be a revenue projection element to this section. A discussion on projected revenue and methodology used as well as variables is needed. A summary of the costs, O&M, revenue and bottom line figures depicted in a table would be useful.

Chapter 3.0 Affected Environment

Figure 3.1-5F Zoning Map, Legend: Designations for F1 and F2 are missing.

Table 3.2-2 Estimated Travel Times (Minutes): it is unclear if the table shows trip time including transfer waiting time or not. It is not clear if the TSM alternative includes transfer scheduling coordination.

3.2.3 Travel Patterns: this section would benefit from having percentages of trips by travel mode, perhaps shown by a graphic. Also, a map showing the TAZs would be useful since these terms are used in describing activity locations, e.g. Pearl Harbor Naval Base, other military locations, medical centers, etc., which are not depicted on any map up to this point in the document.

3.2.3.2: An explanation on the variations in transit shares is needed for the public, i.e. the affects of auto ownership, military facilities, etc.

Figure 3.8-1 Water Quality Survey Stations: it would be useful to portray the bodies of water discussed in the text.

Chapter 4.0 Transportation Impacts

4.0 Chapter Overview and Organization: It is not clear how the seating capacity will be similar under both the BRT and the BRT/SISP Alternative when the transit service under BRT is 44% greater and the transit ridership is only 11% greater than the BRT/SISP Alternative. (Later in the chapter a differential between the two is noted.)

4.2.3 Traffic Operations at Intersections: since LOS is affected by whether an intersection is grade separated, whether one or two locations were assumed to be grade separated needs to be determined or analysis with and without some or no grade separations is needed, especially since past public input was negative regarding grade separation. Perhaps a discussion as to what the affects of not separating versus separating the one or two locations would be is warranted to compare the alternatives.

What is the travel time difference between the general-purpose travel lanes and the exclusive transit lanes? A table similar to 4.1-6 to show non-transit travel times would be useful in comparing modes and alternatives.

Page 4-22: a reference to Table 4.2-7 should read 4.2-6. What is the acronym vpd?

4.3.2 On-Street Parking: it is unclear given alternative descriptions to this point and the discussion of parking in this section whether transit exclusive lanes will be in use only during peak periods or 24 hours a day. Are unrestricted parking spaces being eliminated in order to provide a new restricted parking lane? More discussion of this operational issue is needed in the document as well as its implications on operations and transportation system-wide.

Page 4-27, TSM Alternative: if semi-exclusive lanes are limited to peak hours or to one direction at a time, what is the magnitude of impact expected on the TSM alternative transit operations?

Chapter 5.0 Environmental Analysis & Consequences

Table 5.1-3 Consistency with State Plans and Policies and accompanying text: the information provided should note that the TIP does not include the SISP and any roadway projects currently proposed that may be redundant, and therefore not needed, should the SISP be built.

Ceded Lands: the State of Hawaii revenue sharing issue addressed here needs to be mentioned regarding any financial implications to the to the alternatives in the financial section(s) of the EIS.

5.2 Displacements and Relocations: numerous references to sections where parking impacts are discussed are incorrectly referenced as Section 4.2 instead of 4.3. Right-of-way acquisition from the U.S. Postal Service and the former Kapalama Military Reservation (is this still under Federal ownership? The text is not clear.) cannot be condemned. Since negotiated settlement often involves paying more than fair market

value, does the acquisition estimates include this consideration by increasing the contingency for right-of-way acquisition?

5.4 Visual and Aesthetic Resources: conceptual drawings of the potential visual affects of sound and safety barriers on the park and recreation areas as well as the historic U.S. Immigration Center building would be useful.

5.6 Noise and Vibration: to compare alternatives, the dBA for all potential bus vehicles should be provided. An estimate of the "sufficient distance" needed for park activities in order for them not be impacted by noise should be provided (page 5.6-10).

5.7 Ecosystems: the analysis of lands for the Federal Farmland Protection Act should be done now. At least a likely outcome of the analysis should be presented in the DEIS with more specific information in the FEIS with the LPA. Regarding runoff pollutants, the discussion appears to indicate that the BRT and BRT/SISP Alternatives would have the same impact; the BRT/SISP alternative should have more impacts since more highway (and thus runoff) is involved.

5.8 Water: wouldn't impervious surface area be more under the BRT/SISP Alternative? The estimated increase in pavement area (i.e. road lanes) would be useful in comparing the alternatives. Are the tunnel portals required to rise above the 1,000-year flood level? (If Hawaii requirements differ from usual requirements it would be useful to note them.) The initial survey for wetlands should be done now. The Coastal Zone Management Area consistency determination needs to be done for the FEIS.

5.10 Historic and Archaeological Resources: the Mokauea Fishermen's Association concern of water quality from construction run-off should also be noted and discussed in the section 5.12, Impacts of Construction Activities. Table 5.10-2 indicates follow-up needed with Na Maka o ka Aina; is there any update? The comment request date should be removed and any updated information should be included.

5.11 Parklands and Section 4(f) Evaluation

- This section needs to include historic resources, particularly the Fort Armstrong wall. Later in the section it is stated that "None of the alternatives would use or take a historic site." Part of a likely historic site (Fort Armstrong wall), per the previous section, will be impacted. (The introductory paragraphs should note that historic sites are included in the evaluation; this is first noted in 5.11.2 and then never addressed in the evaluation.)
- This section needs visuals: maps, pictures, drawings, etc.
- Letters to and form the park authorities over the parks involved should be included in an EIS appendix and information from the park authorities should be included. E.g., do the park authorities agree that vehicular access will be enhanced by the BRT/SISP Alternative?
- This section needs to address how project impacts will be minimized and mitigation possibilities need to be expanded with visuals showing the information.

- Aloha Stadium: how many parking spaces would be affected? Is there any overlap with the need for the shared parking spaces given events that currently take place there? Will more of the attendees of the events use transit if the service was expanded – i.e. there is a decrease in the need for the overflow parking?
- Is there a letter indicating the Sand Island business community's support of a particular option?
- It is not clear what park authorities own what parks. Is there any correspondence indicating the consultation that has taken place to date?
- Kalihi Kai Park: more information on the uses of the park are needed. The acronym SIAR is not defined. It is not clear how there would not be a Section 4(f) if a revised master plan of the park includes Marina Road. Is there any proposals to date to change the master plan?

5.12 Impacts of Construction Activities

- Will truck traffic be using existing truck routes in place except for near construction areas? Describe how and what agency will be approving the Maintenance of Traffic Plan.
- What are possible standby/fleeting areas for construction vessels?
- More information is needed on potential mitigation for noise and vibration: what determines whether noise barriers are "feasible"? Why wouldn't noisier activities be limited to daytime hours?
- It is not clear if siren locations for the Civil Defense Warning System may be needed under all alternatives and the magnitude of this impact.

5.13 Other Environmental Considerations

- Regarding land use, a discussion on enabling quicker east-west connection with the BRT/SISP Alternative and thus distance traveled and around the urban core via automobile should be discussed.
- 5.13.2, the purpose and need of the project in relation to the goals and objectives are unclear. (See additional comments elsewhere.)

Chapter 6.0 Financial Analysis

The bus maintenance facility capital costs do not appear to be incorporated into the financial analysis.

6.1 Financial Analysis: MPO should be OMPO since the rest of the document and the acronym list only uses OMPO.

The O&M costs associated with the Sand Island tunnel and debt service payments should be included in the figures even if they are paid by toll revenues in order to accurately compare the alternatives. (See Table 6.1-11 footnote.)

Chapter 7.0 Comparison of Alternatives

The BRT and BRT/SISP alternatives should be compared amongst themselves in the text.

Table 7.4-1 is referenced but it is not provided.

It is stated that the SISP would improve access to Sand Island but this was not previously addressed as a transportation need. Is this a need or a secondary benefit from this alternative?

Glossary

- Screenline and Section 4(f) should be added.

Appendix A Coordination and Consultation

- It is not clear how the Sand Island Scenic Parkway/Nimitz Parkway plan became part of the Primary Transportation Corridor Project. The Rounds of meetings focused on transit alternatives and then in Round Three the SISP plan was "displayed" and in Round Four "explained". What and how were ideas, information, etc. from public utilized in Mobility Plan and developing the MIS/DEIS?
- Comment responses to scoping comments and letters are noted in the text and Table A.2-3 notes that responses are in Appendix E, and no Appendix E is provided. There are numerous comments, especially regarding transportation analyses that are not addressed in the EIS.
- The acronym LOTMA under public organization comments is not defined in the appendix or list of acronyms.

Appendix B Bus Rapid Transit Draft Conceptual Design Drawings (Separate Volume)

- Not provided.

Appendix C Sand Island Scenic Parkway & Marina Road Draft Conceptual Design Drawings (Separate Volume)

- Not provided.

Appendix D Screening of Alternatives

- D.2 Alignment Screening for the In-Town BRT System: this section would benefit by expanding the discussion of how possible alignments were initially determined, a comparative matrix of the factors used to narrow alternatives, i.e. ridership potential, meeting purpose and need, etc., a map of various alignments, and discussion of the option(s) carried forward.

- D.3.2 Detailed Comparison of Light Rail and Electric Bus Technologies: Providing the cost-effectiveness index figures in the discussion of criteria five, including examples of other projects nationwide, would be useful for alternative comparison.
- D.4 Evaluation of Subalternatives: this section would benefit by expanding the discussion of how possible alignments were initially determined, a comparative matrix of the factors used to narrow alternatives, i.e. ridership potential, meeting purpose and need, etc., a map of various alignments, and discussion of the option(s) carried forward.