

2002 - Oahu - FEIS -  
Primary Corridor  
Transportation 2

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~~PLANNER~~

# Final Environmental Impact Statement

Submittal Pursuant to  
Chapter 343, Hawaii Revised Statutes

VOLUME 2

Chapter 7:  
Comments  
and  
Responses

Primary Corridor Transportation Project



City and County of Honolulu  
Department of Transportation Services

NOVEMBER 2002



**Final Environmental Impact Statement**

**Primary Corridor Transportation Project**

**Chapter 7.0**

**Comments and Responses**

**Volume 2**



## CHAPTER 7 COMMENTS AND RESPONSES

### 7.0 OVERVIEW

This Chapter presents a record of the comments received on the Primary Corridor Transportation Project Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) [August 2000] and the Supplemental Draft Environmental Impact Statement (SDEIS) [March 2002] during the public comment period and responses to those comments. Written and oral comments provided at the respective public hearings have been included. Revisions have been made to the Final Environmental Impact Statement (FEIS) text and graphics as a result of these comments. A vertical black line in the right margin throughout the FEIS indicates these changes and other technical changes

### 7.1 PUBLIC REVIEW PROCESS

#### 7.1.1 MIS/DEIS Public Review Process

The formal public hearing for the MIS/DEIS was held on Thursday, October 12, 2000 at the Hawaii Suites, Neal Blaisdell Center, 777 Ward Avenue, Honolulu, Hawaii. The Federal Transit Administration (FTA) approved the project's MIS/DEIS for public circulation on August 16, 2000. The Hawaii Office of Environmental Quality Control (OEQC) also approved the document for public distribution. Printed copies of the document were distributed to the public, libraries, community groups, and local, State and federal agencies for review. A separate volume of technical drawings was available for public examination at libraries and the Department of Transportation Services (DTS) and was also available upon request. The document, including the technical drawings, was also available on CD-ROM upon request. Those who submitted comments on the Environmental Impact Statement Preparation Notice (EISPN), published in accordance with Chapter 343, Hawaii Revised Statutes, were also sent printed copies.

Notices of the availability of the MIS/DEIS and information on the public hearing were provided through direct mailings (about 10,000 addresses); a legal notice in Midweek; and display advertisements in Midweek, the Honolulu Advertiser, and the Honolulu Star-Bulletin. The availability of the document was also given substantial media coverage including coverage by local television stations.

#### 7.1.2 SDEIS Public Review Process

The FTA approved the SDEIS for public circulation on March 5, 2002. The State of Hawaii, Office of Environmental Quality Control (OEQC) approved the SDEIS for distribution on March 12, 2002. SDEIS printed copies were distributed to the public, libraries, community groups, and local, State, and federal agencies for review and comment by March 15, 2002. The SDEIS was also available on CD-ROM upon request and placed on the project website ([www.oahutrans2k.com](http://www.oahutrans2k.com)). People and agencies who submitted comments on the MIS/DEIS and the Environmental Impact Statement Preparation Notice (EISPN), published in accordance with Chapter 343, Hawaii Revised Statutes, were also sent printed copies.

The SDEIS Notice of Availability (NOA) was published in the March 23, 2002 The Environmental Notice. The SDEIS NOA and public hearing information were advertised in the Honolulu Star-Bulletin, and the project newsletter (Project Report No. 7), which was mailed to approximately 10,000 addresses. Also, between April 12, 2002 and April 19, 2002 several advertisements were published in The Honolulu Advertiser, and Honolulu Star-Bulletin. The SDEIS availability was given substantial media coverage particularly in local newspapers.

The SDEIS public hearing was held on Saturday, April 20, 2002 at the Hawaii Convention Center, from 9 a.m. until approximately 3 p.m.

## 7.2 COMMENTS RECEIVED

For the MIS/DEIS, 152 comment letters were received from federal, state, and local agencies; elected officials; neighborhood boards; businesses; civic organizations; and citizens. Twenty-three people presented oral testimony at the MIS/DEIS public hearing. At the special City Council Transportation Committee public hearings, 86 people presented oral and/or written testimony regarding the project.

For the SDEIS, 95 comment letters were received and 63 people gave oral testimony at the public hearing.

Many comments received expressed support or opposition to a particular alternative. Numerous substantive comments were also received during the MIS/DEIS and SDEIS public comment periods. The most frequently expressed concerns related to the following issues:

1. Costs and methods of financing a BRT alternative;
2. Traffic and transportation issues;
3. Community and social concerns; and
4. Anticipated ridership.

Table 7.2-1 lists the agencies, organizations, etc. that commented on either the MIS/DEIS and/or SDEIS. The comment letters received and response letters prepared for both written and oral comments received on the MIS/DEIS and SDEIS follow the order shown in Table 7.2-1.

**TABLE 7.2-1  
MIS/DEIS AND SDEIS COMMENTERS**

Commenter	MIS/DEIS	SDEIS
<b>Federal Agencies</b>		
U.S. Department of Agriculture, Natural Resources Conservation Service	X	
U.S. Department of the Army, Army Engineer District, Honolulu	X	X
U.S. Department of the Navy, Commander, Navy Region Hawaii	X	
U.S. Department of the Air Force, Pacific Air Forces		X
U.S. Department of the Interior, National Park Service	X	
U.S. Environmental Protection Agency	X	X
<b>State Agencies</b>		
Department of Accounting and General Services		X
Department of Business, Economic Development & Tourism (DBEDT), Housing and Community Development Corporation of Hawaii	X	
DBEDT Land Use Commission	X	
DBEDT Research and Economic Analysis Division	X	
Department of Education	X	X
Department of Health	X	X
Department of Land and Natural Resources (DLNR), Historic Preservation Division	X	
DLNR Land Division	X	X
Department of Transportation	X	X
Hawaii Community Development Authority		X
Office of Environmental Quality Control	X	X
Office of Hawaiian Affairs	X	X
University of Hawaii, Senior Vice President for Administration	X	
University of Hawaii, Environmental Center	X	X

**TABLE 7.2-1  
MIS/DEIS AND SDEIS COMMENTERS (CONT.)**

<b>Commenter</b>	<b>MIS/DEIS</b>	<b>SDEIS</b>
<b>City and County Departments</b>		
Board of Water Supply	X	X
Department of Design and Construction		X
Department of Environmental Services	X	
Department of Facility Maintenance	X	
Department of Parks and Recreation	X	X
Department of Planning and Permitting	X	
Department of Transportation Services, Committee for Accessible Transportation	X	
Fire Department	X	X
Mayor's Advisory Committee on Bicycling	X	
Police Department	X	
Transportation Commission	X	
<b>Elected Officials</b>		
Honorable Daniel K. Akaka, U.S. Senator		X
Honorable Carol Fukunaga, State Senator, 12th District	X	
Honorable Les Ihara, State Senator, 10th District	X	
Honorable Norman Sakamoto, 15th District		X
Honorable Charles K. Djou, State Representative, 47th District		X
Honorable Galen Fox, State Representative, 21st District		X
Honorable Darrlyn Bunda, City Councilmember, District 1	X	
Honorable Romy M. Cachola, City Councilmember, District 7	X	X
Honorable Gary H. Okino, City Councilmember, District 8		X
<b>Neighborhood Boards and Community Groups</b>		
Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board No. 5	X	
McCully/Moiliili Neighborhood Board No. 8	X	
Makiki/Lower Punchbowl/Tantalus Neighborhood Board No. 10	X	X
Ala Moana/Kakaako Neighborhood Board No. 11		X
Downtown Neighborhood Board No. 13	X	X
Waianae Coast Neighborhood Board No. 24	X	
Mililani/Waipio/Melemanu Neighborhood Board No. 25	X	
Kalihi-Palama Community Council	X	
Waipahu Community Association	X	
<b>Organizations</b>		
American Public Works Association, Hawaii Chapter		X
Building Industry Association of Hawaii	X	
Citizens Advocating Responsible Education (C.A.R.E.)	X	X
Consulting Engineers Council of Hawaii		X
General Contractors Association of Hawaii	X	
Hawaii Activities and Tours Association		X
Hawaii Attractions Association	X	
Hawaii Construction Industry Association	X	
Hawaii Hotel Association	X	
Hawaii Teamsters and Allied Workers, Local 996 (4 commenters)	X	X
Hawaii's Thousand Friends	X	
Hawaii Transportation Association		X
Kapiolani Park Preservation Society		X
Laborers' International Union of North America, Local 368, AFL-CIO	X	
Land Use Research Foundation of Hawaii	X	X
The League of Women Voters of Honolulu	X	X
Leeward Oahu Transportation Management Association	X	

TABLE 7.2-1  
MIS/DEIS AND SDEIS COMMENTERS (CONT.)

Commenter	MIS/DEIS	SDEIS
The Libertarian Party of Hawaii		X
Life of the Land	X	
Masons Union, Local #1 Hawaii, IUBAC, Local #630, OP & CMIA, AFL-CIO	X	
Na Leo Pohai, The Public Policy Affiliate of The Outdoor Circle	X	
The Outdoor Circle	X	X
Pacific Action Alliance		X
Pacific Resource Partnership	X	
Sierra Club, Hawaii Chapter	X	
Waikiki Improvement Association	X	X
<b>Businesses</b>		
Ala Moana Center	X	
Architects Hawaii Limited		X
Charley's Taxi	X	X
E Noa Corporation	X	X
The Estate of James Campbell	X	
Hawaiian Electric Company, Inc. (3 commenters)	X	X
Hilton Hawaiian Village (2 commenters)	X	
IND-COM Management	X	
Bobbie Jennings' Sports Network	X	
Oahu Transit Services, Inc.		X
Outrigger Enterprises, Inc.	X	
Paradise Cruise, Ltd.		X
Passport Railroad	X	
Pauahi Management Corporation	X	
Polynesian Adventure Tours	X	
SuperStar		X
T. Eki, Inc./Eki Cyclery	X	
Trans Hawaiian Services	X	
Verizon	X	
Victoria Ward, Limited	X	
York & Company, Inc.		X
<b>Citizens</b>		
Karl Adams & Mary Lou Zingalie-Adams	X	
Naomi Ahuna		X
David Aki		X
Ronald D. Armenoff, Tonja Taylor, & Patricia J. Ho	X	
David Atkin		X
Ella Autry	X	
Gary Bautista	X	
Kent Bennett	X	
Martha Black	X	
Sam Bren	X	X
Jeb P. Brown		X
Martin J. Burke	X	
Sam Caldwell	X	
Dennis Callan	X	
Charles H. Carole	X	X
Helen T. Carroll	X	X
Keith Chan	X	
Jimmy Chong	X	

TABLE 7.2-1  
MIS/DEIS AND SDEIS COMMENTERS (CONT.)

Commenter	MIS/DEIS	SDEIS
Dave Chun	X	
Dave Kaulike Chun, Ron Lockwood, & Alfred Akana		X
Barbara J. Chung	X	
John Ciesla	X	
Victor & Marie Cole		X
Yolanda Coloma		X
Bruce Coppa	X	
Joseph Cordero		X
Roger Couture		X
Mary Cowing		X
Bill Craddick		X
C.C. Curry	X	
Mike Dahilig	X	
Beadie Kanahele Dawson		X
Eve DeCoursey	X	
John W. Dell		X
Betty Downing	X	X
Justin Enomoto		X
Wes Frysztacki		X
Alan Fujimori		X
Albert Fukushima	X	
Bennett Fung		X
Ciprie Galima		X
Larry Geller		X
Matt Gilbertson		X
Burt Goldenberg	X	
Frederick C. Gross	X	X
Raymond A. Gruntz	X	X
Jim Hall		X
Keith Hamada	X	X
Tom Heinrich		X
Kathleen Higa	X	X
Paul Honzik		X
Barbara L. Hudman		X
Larry Hurst		X
Ed Ige		X
Janet S. Inamine		X
Carl Jacobs	X	X
Ambrose Keohu	X	
Molly M. Kihara		X
Erin Kilpatrick	X	
Amy Kimura	X	
Seiichi Kimura	X	
Eric Koike		X
Melody M. Kubo		X
Bill Lane		X
David Laughlin*	X	
Kathy Leong	X	
Paul T. Leong	X	
Randolph F. Leong	X	

TABLE 7.2-1  
MIS/DEIS AND SDEIS COMMENTERS (CONT.)

Commenter	MIS/DEIS	SDEIS
Bill Leveau		
Wendall Lum		X
Donald Mack	X	X
Elizabeth Mack*	X	
Randall W. Mack	X	
Lee Manfredi	X	
Michelle Spalding Matson	X	
David Maxwell	X	X
Laurie McCollum*		X
Helen McCune		X
Ed McInerny		X
Kii McMannen	X	
V. McWaters	X	
D. Meller		X
Joe Miller	X	
J.T. Miller	X	
Mark A. Monoscalco	X	
Jack Morse		X
Daisy M. Murai		X
Kevin Nakamoto	X	X
Stacey Namihira		X
Kim Nichols		X
Bill Pelzer	X	
Richard J. Port		X
Glen Robinson	X	
Patrick Rorie	X	
Ann Ruby	X	
Harrison Rue		X
William Samaritano	X	
Donald Samuel		X
Noel Sario	X	
Warren Sato		X
Janis Sauter		X
Arun Savara	X	
Thomas Schnell		X
Cindy Schultz	X	
Rod Schultz		X
Cliff Slater		X
Tom Smyth		X
Richard C. Stancliff		X
David Stanton	X	
Linda Starr		X
Joel Stauring	X	
Cheryl A. Stephenson		X
Dick Stephenson		X
Georgette Stevens-Begley		X
Jane Sugimura	X	
Charles O. Swanson	X	
Allan Tagayuna	X	
Henry Takahashi		X
	X	



**TABLE 7.2-1  
MIS/DEIS AND SDEIS COMMENTERS (CONT.)**

Commenter	MIS/DEIS	SDEIS
Clifton Takamura		
Toshi Takata	X	X
Lee Takushi*		X
Claire Tamamoto		X
Calvin Tamaye	X	X
Katsumi Tanaka	X	
Lila Tarsey		X
Patty Teruya		X
Baki Thomas	X	
Robert Thomas		X
Steve Tierney		X
Maeda Timson	X	
Howard Tocman	X	
Dean Uchida	X	
Jon von Kessel		X
Lea Sasak Watts	X	
LaVonne West		X
Dan Withrow		X
Greg Wonghan		X
Louis Xigogianis		X
Ron York		X
Joseph W.C. Young		X
Pam Young	X	
	X	

Source: Parsons Brinckerhoff, September 2002.

Note: \*Commenter's address was not provided and could not be obtained. Therefore, DTS was not able to mail the responses provided in this FEIS to the commenter.



**Final Environmental Impact Statement**

**Primary Corridor Transportation Project**

**Chapter 7.0**

**Comments and Responses  
Federal Agencies**



United States  
Department of  
Agriculture  
Natural  
Resources  
Conservation  
Service  
P.O. Box 50004  
Honolulu, HI  
96850



Our People...Our Islands...In Harmony

October 2, 2000

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813

Dear Ms. Soon:

Subject: Reference no. TPD00-00418 - Major Investment Study/Draft Environmental  
Impact Statement (MIS/DEIS) - Primary Corridor Transportation Project, Ewa,  
Oahu

We have reviewed the above mentioned document and have no comments to offer at  
this time.

Thank you for the opportunity to review this document.

Sincerely,

KENNETH M. KANESHIRO  
State Conservationist

Cc: Governor, State of Hawaii, c/o Office of Environmental Quality Control, 235 S. Beretania  
Street, Suite 702, Honolulu, Hawaii 96813  
Mr. Robert Braman, Project Manager, Parsons Brinckerhoff Quade and Douglas, Inc.,  
Pacific Tower, Suite 3000, 1001 Bishop Street, Honolulu, HI 96813

The Natural Resources Conservation Service works hand-in-hand with  
the American people to conserve natural resources on private lands.

AN EQUAL OPPORTUNITY EMPLOYER

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU  
655 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 522-4529 • Fax: (808) 522-1720 • Internet: www.cc.honolulu.hi.us



JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE KECORO IYALAMOTO  
DEPUTY DIRECTOR

TPD1000-04817R

November 13, 2002

Mr. Kenneth M. Kaneshiro  
State Conservationist  
United States Department of Agriculture  
Natural Resources Conservation Service  
P.O. Box 50004  
Honolulu, Hawaii 96850

Dear Mr. Kaneshiro:

Subject: Primary Corridor Transportation Project

This is in response to your comments on the Major Investment Study/Draft Environmental Impact  
Statement (MIS/DEIS). Your October 2, 2000 letter stated that you had no specific comments. We  
appreciate your taking the time to review the MIS/DEIS.

We will send you a copy of the Final Environmental Impact Statement under separate cover. We  
appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director



DEPARTMENT OF THE ARMY  
U. S. ARMY ENGINEER DISTRICT, HONOLULU  
FT. SHAFTER, HAWAII 96860-4440

REPLY TO  
ATTENTION OF

Regulatory Branch

September 13, 2000



DEPARTMENT OF THE ARMY  
U. S. ARMY ENGINEER DISTRICT, HONOLULU  
FT. SHAFTER, HAWAII 96860-4440

REPLY TO  
ATTENTION OF

Regulatory Branch

March 18, 2002

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
711 Kapiolani Boulevard,  
Honolulu, Hawaii 96813

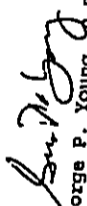
Dear Ms. Soon:

This letter responds to your request, dated August 24, 2000, for our review and comments on the Major Investment Study/Draft Environmental Impact Statement for the Primary Corridor Transportation Project.

It is possible that some of the components of the project may require a Department of the Army (DA) permit; however, since the information provided is not sufficiently detailed to determine specific permit requirements. As the project elements progress to final design stages, we will be better able to advise you concerning permit requirements.

If you have any questions concerning this matter, please contact William Lennan of my staff at 438-6986 or FAX 438-4060, and reference File No. 990000338.

Sincerely,

  
George P. Young, P.E.  
Chief, Regulatory Branch

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
711 Kapiolani Boulevard,  
Honolulu, Hawaii 96813

Dear Ms. Soon:

Thank you for the opportunity to review the Supplemental Draft Environmental Impact Statement for the Primary Corridor Transportation Project, dated March 2002. The comments contained in my letter to you dated September 13, 2000 are still appropriate, and we have no additional comments.

If you have any questions concerning this matter, please contact William Lennan of my staff at 438-6986 or FAX 438-4060, and reference File No. 990000338.

Sincerely,

  
George P. Young, P.E.  
Chief, Regulatory Branch

Copy furnished:  
Ms. Genevieve Salmonson, Director, Office of Environmental Control, State of Hawaii, 235 South Beretania Street, Suite 702, Honolulu, HI 96813

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
400 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 523-4339 • Fax: (808) 523-4790 • Website: www.cc.honolulu.hi.us

JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE WOODY MIYAMOTO  
SENIOR DIRECTOR

November 13, 2002

TP0800-04513R

Mr. George P. Young, P.E.  
Department of the Army  
U.S. Army Engineer District, Honolulu  
Fort Shafter, Hawaii 96858-5440

Dear Mr. Young:

Subject: Primary Corridor Transportation Project

This is in response to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and the Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your September 13, 2000 letter regarding the Major MIS/DEIS and Part B responds to your March 18, 2002 letter regarding the SDEIS.

Part A - MIS/DEIS Comments

1. It is possible that some of the components of the project may require a Department of the Army (DA) permit; however, since the information provided is not sufficiently detailed to determine specific permit requirements. As the project elements progress to final design stages, we will be better able to advise you concerning permit requirements.

Response: Coordination with the Army is continuing and at this time we do not believe the project will require a DA permit.

Part B - SDEIS Comments

2. Thank you for the opportunity to review the Supplemental Draft Environmental Impact Statement for the Primary Corridor Transportation Project, dated March 2002. The comments contained in my letter to you dated September 13, 2000 are still appropriate, and we have no additional comments.

Response: Coordination with the Army is continuing and at this time we do not believe the project will require a DA permit. The FEIS does identify the required permits.

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director



DEPARTMENT OF THE NAVY  
COMMANDER  
NAVY REGION HAWAII  
517 PEARL AND BELL AVENUE, SUITE 110  
PEARL HARBOR, HAWAII 96860-4884

WIRE/TELETYPE TO:  
5090  
Ser N465/1692J  
08 NOV 2000

City and County of Honolulu  
Department of Transportation Services  
Pacific Park Plaza  
711 Kapiolani Blvd, Suite 1200  
Honolulu, HI 96813

Dear Sir or Madam:

Thank you for inviting us to participate in reviewing and commenting on the draft EIS for the "Primary Corridor Transportation Project" on the island of O'ahu, Hawaii.

At this time, we have no comments. We understand that this project will not impact any federal government properties.

If have any further questions or concerns, please contact Ms. Amanda Mano'i at 471-1171 ext. 223.

Sincerely,

R. M. WAKUNOTO

Director  
Regional Environmental Department  
By direction of  
Commander, Navy Region Hawaii

Copy to: Governor, State of Hawaii c/o Office of Environmental  
Quality Control  
Parsons Brinckerhoff Quade and Douglas, Inc.

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
850 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 433-4339 • Fax: (808) 523-1720 • Internet: www.cc.honolulu.hi.us

JEREMY HAOKS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE MIYAMOTO  
DEPUTY DIRECTOR

TPD1100-05409R

November 13, 2002

Commanding Officer  
Navy Region Hawaii, Environmental Department  
Code N465  
517 Russell Avenue, Suite 110  
Pearl Harbor, Hawaii 96860  
Attention: Mr. Ralph Wakumoto

Dear Sir:

Subject: Primary Corridor Transportation Project

This is in response to your November 3, 2000 letter, which provided us with comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

"At this time, we have no comments. We understand that this project will not impact any federal government properties."

Response: The proposed project will not affect any Navy properties. We appreciate you reviewing the MIS/DEIS.

We will send you a copy of the Final Environmental Impact Statement under separate cover. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director



DEPARTMENT OF THE AIR FORCE  
PACIFIC AIR FORCES

MEMORANDUM FOR Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3rd Floor  
Honolulu, Hawaii 96813

10 7 MAY 2002

MAY 7 2002

FROM: 15 CES/CE-2  
75 H Street  
Hickam AFB, HI 96853-5233

SUBJECT: Review of Supplemental Draft Environmental Impact Statement (DSEIS) for Primary Corridor Transportation Project

1. Thank you for the opportunity to comment on the subject document. The Air Force is interested in the primary corridor transportation system for two reasons:

- a. Transportation for our residents and personnel on Hickam AFB
- b. Security

2. According to subject document and confirmed by Ms. Faith Miyamoto from the City and County Department of Transportation Services, transportation to and from Hickam AFB will not change. The primary public transit will continue to be the current bus route number 19. This is both positive and negative. It will not raise any additional security concerns for Hickam AFB, but it will not improve traveling to and from Hickam AFB. We hope that there would be a transit stop in the vicinity of the airport and Elliot Street for a new more direct rapid transit system along the main corridor from near the Hale Koa in Waikiki, past downtown to the Airport, Hickam AFB and Pearl Harbor. To use the proposed Bus Rapid Transit System, personnel at the Hale Koa Hotel would have to transfer at Middle Street, or go past Hickam AFB to Aloha Stadium and transfer there. This defeats the purpose of the system and most would continue to take the circuitous bus route 19 rather than transferring. It also appears that an additional on-grade system within existing traffic arteries would snarl traffic. A grade separated rapid transit system along the primary corridor would not snarl traffic and would not be delayed by other traffic.

3. The subject document does not address traffic delays caused by the need for increased security at the airport and military installations. Current planning should be updated to accommodate for needs prompted by increased security. Access ways to military installations need to be modified and provide for security checks, parking, and ability to turn vehicles around.

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
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JEREMY HARDS  
MANAGER



CHEYLD SOOH  
DIRECTOR

GEORGE MENDOZA MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPDS02-01831R

4. Finally, bypasses are needed for key interchanges like the H-1/H-2 merge where a single accident can shut down both highways.

5. If you have any questions please contact our Environmental Planning Element Chief, Mr. Gary O'Donnell, AIA at 449-1584, extension 245.

*Marc M. Aoyama*  
MARC M. AOYAMA, P.E.  
Deputy Base Civil Engineer  
15th Civil Engineer Squadron

Mr. Marc M. Aoyama, P.E.  
Deputy Base Civil Engineer  
Department of the Air Force  
Pacific Air Forces  
15 CES/CE-2  
75 H Street  
Hickam AFB, Hawaii 96853-5233

Dear Mr. Aoyama:

Subject: Primary Corridor Transpocaliation Project

This is in response to your May 7, 2002 letter regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS). We have the following responses:

1. Thank you for the opportunity to comment on the subject document. The Air Force is interested in the primary corridor transportation system for two reasons:
  - a. Transportation for our residents and personnel on Hickam AFB
  - b. Security

**Response:** Thank you for reviewing the SDEIS and submitting comments.

2. According to subject document and confirmed by Ms. Faith Miyamoto from the City and County Department of Transportation Services, transportation to and from Hickam AFB will not change. The primary public transit will continue to be the current bus route number 19. This is both positive and negative. It will not raise any additional security concerns for Hickam AFB, but it will not improve traveling to and from Hickam AFB. We hope that there would be a transit stop in the vicinity of the airport and Elrod Street for a new more direct rapid transit system along the main corridor from near the Hale Koa in Waikiki, past downtown to the Airport, Hickam AFB and Pearl Harbor. To use the proposed Bus Rapid Transit System, personnel at the Hale Koa Hotel would have to transfer at Middle Street, or go past Hickam AFB to Aloha Stadium and transfer there. This defeats the purpose of the system and most would continue to take the circuitous bus route 19 rather than transferring. It also appears that an additional on-grade system within existing traffic arteries would snarl traffic. A grade separated rapid transit system along the primary corridor would not snarl traffic and would not be delayed by other traffic.

**Response:** The proposed Bus Rapid Transit system cannot provide high speed linkages everywhere. The City will continue to work with the Air Force and other branches of the military to maintain and improve bus service to major military employment sites.



United States Department of the Interior  
 NATIONAL PARK SERVICE  
 Pacific Great Basin Support Office  
 600 Harrison Street, Suite 600  
 San Francisco, California 94107-1372

IN REPLY, REFER TO:  
 L1117P(5007P)

September 6, 2000

Ms. Cheryl D. Soon  
 City and County of Honolulu  
 Department of Transportation Services  
 711 Kapiolani Boulevard, Suite 1200  
 Honolulu, HI 96813

Subject: Primary Corridor Transportation Project - Aloha Stadium (N:HI 495A)  
 Dear Ms. Soon:

The National Park Service is in receipt of your recent letter regarding the subject project proposal for the development of a park and ride/transit station facility on former federal property now containing the overflow parking area for Aloha Stadium. The former Halawa Aiea Veterans Housing Area was transferred to the City and County of Honolulu in June 1967 for park and recreation use by the General Services Administration under the authority of the Federal Property and Administrative Services Act. The city's application for public benefit conveyance of the property identified the current stadium as the proposed recreation use. In October 1970 the City and County of Honolulu transferred the former federal property to the State of Hawaii, with the Department of Interior concurrence. Under the terms of the 1967 federal quitclaim deed and the October 1970 deed to the State of Hawaii, the property "shall be continuously used and maintained as and for public park and recreation uses".

Based upon the information provided within the letter and the *Major Investment Study/Draft Environmental Impact Statement (August 2000)* for the subject project, we find the proposed park and ride/transit facilities would not detract from the ongoing recreation use on the former federal property or represent a breach of the deeds transferring the property. We understand the proposed facilities would require the improvement of approximately half of the overflow parking area and the use of the parking area by commuters is unlikely to overlap with major scheduled events at the stadium. The proposed parking lot improvement and enhanced transit connections are viewed as a benefit to stadium users.

We could find no records indicating prior Land and Water Conservation Fund (LWCF) grant improvements on the subject property. Only properties acquired or developed with LWCF grants are subject to Section 6(O)(3) protection and conversion requirements requiring substitution of converted parkland with land of equal market value, location, and utility.

The National Park Service reserves final comment on the Section 4(f) evaluation pending a formal request by the Federal Highway Administration. If you have any questions, please do not hesitate to contact me at 415-427-1445.

Sincerely,

*Cheryl D. Soon*  
 Cheryl D. Soon  
 Federal Lands to Parks Program Coordinator

Mr. Marc M. Aoyama, P. E.  
 Page 2  
 November 13, 2002

3. The subject document does not address traffic delays caused by the need for increased security at the airport and military installations. Current planning should be updated to accommodate for needs prompted by increased security. Access ways to military installations need to be modified and provide for security checks, parking, and ability to turn vehicles around.

**Response:** The need for increased security has been taken into account wherever the BRT alignment is in the vicinity of a military installation. The Luapoe Drive ramp will have required security fencing to ensure that it does not compromise the integrity of the current fencing at the Navy's Makalapa site. At Fort DeRussie the BRT stops will be the proper security distance from the Hele Koa Hotel.

4. Finally, bypasses are needed for key interchanges like the H-1/H-2 merge where a single accident can shut down both highways.

**Response:** Widening of the H-2 H-1 down bound connector ramp to permit a continuation of the P.M. zipper into the H-2 mauka bound HOV lane will provide a path for BRT buses and other P.M. zipper lane users around potential blockages at the Waiawa interchange.

We will send you a copy of the Final Environmental Impact Statement under separate cover. We appreciate your interest in the project.

Sincerely,

*Cheryl D. Soon*  
 CHERYL D. SOON  
 Director



DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
430 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 533-4339 • Fax: (808) 533-4729 • Internet: www.cc.honolulu.hi.us



EBELYN HARBO  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE YEKKO\* MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD9/00-4380R

Mr. Gary Munsterman  
Federal Lands to Parks Program Coordinator  
United States Department of the Interior  
National Park Service  
Pacific Great Basin Support Office  
600 Harrison Street, Suite 600  
San Francisco, California 94107-1372

Dear Mr. Munsterman:

Subject: Primary Corridor Transportation Project

This responds to your September 6, 2000 letter, which provided comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. Based upon the information provided within the letter and the Major Investment Study/Draft Environmental Impact Statement (August 2000) for the subject project, we find the proposed park and recreation facilities would not detract from the ongoing recreation use on the former federal property or represent a breach of the deeds transferring the property.

Response: Thank you for this information.

2. We understand the proposed facilities would require the improvement of approximately half of the overflow parking area and the use of the parking area by commuters is unlikely to overlap with major scheduled events in the stadium. The proposed parking lot improvement and enhanced transit connections are viewed as a benefit to stadium users.

Response: Thank you for your support.

3. We could find no records indicating prior Land and Water Conservation Fund (LWCF) grant improvements on the subject property. Only properties acquired or developed with LWCF grants are subject to Section 6(f)(3) protection and conversion requirements requiring substitution of converted parkland with land of equal market value, location and utility.

Response: Thank you for this information.

Mr. Gary Munsterman  
Page 2  
November 13, 2002

4. The National Park Service reserves final comment on the Section 4(f) evaluation pending a formal request by the Federal Highway Administration.

Response: The project does not involve Section 4(f) uses. Therefore, a Section 4(f) evaluation was not completed for the Final Environmental Impact Statement (FEIS).

We will send you a copy of the FEIS under separate cover. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

Ceryl Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
Pacific Park Plaza  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, HI 96813

Dear Ms. Soon:

The Environmental Protection Agency (EPA) has reviewed the Major Investment Study/Draft Environmental Impact Statement for the Primary Corridor Transportation Project, Honolulu, Hawaii (CEQ# 000311, ERPA# FTA-K40241-H). Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act (CAA).

The proposed project is for transportation improvements in Oahu's primary transportation corridor, which stretches from Kapiolani in the west and Waikiki in the east, and to improve connections between the primary transportation corridor and the rest of the island. Three alternatives are presented in the Draft Environmental Impact Statement (DEIS). Three Alternatives, 2) Transportation System Management (TSM) Alternative, and 3) No-Build (BRT) Alternative. The primary feature of the TSM Alternative is the reconfiguration of the present bus route network to a hub-and-spoke network, including the development of the bus movement at key locations. The "bus priority measures" are intended to speed exclusive bus lanes, bus priority lanes, que jump lanes, a new freeway ramp, the extension of semi-zipper lane, and road widening to accommodate new express lanes for buses. The BRT alternative builds on the TSM alternative by providing exclusive, or semi-exclusive, transit lanes for regional and In-Town buses. Regionally, an uninterrupted transitway is created along the H-1 freeway. In-Town, electric BRT vehicles would operate at-grade in exclusive lanes along major arterials. A preferred alternative has not been selected.

There are a number of components of the proposed project that reflect a strong environmental protection and sustainable development ethic. EPA is highly supportive of the Purpose and Need statements, "1. Increase the people-carrying capacity of the system in the primary transportation corridor by providing attractive alternatives to the private automobile" and "2. Support desired development patterns," which include integrated land use and transportation planning designed to reinforce community livability. One of the goals of this project is to shift from auto-oriented, dispersed, single-use development to a land use pattern

with a mix of activities that promotes walking and that focuses on a central transit system. EPA applauds the City and County of Honolulu and its State and Federal partners for its forward-thinking approach to transportation management in metropolitan Honolulu. If successful, EPA believes this project could set an example for other metropolitan areas in the U.S.

In our review, we found that the document adequately addressed major areas of environmental concern. We have rated each alternative, LO - Lack of Objection. (Please see the enclosed rating sheet for further explanation of the rating system.) We believe, however, that there are opportunities to improve the document for the benefit of the public and decision makers. Specifically,

Southern Oahu Basal Aquifer (SOBA)

The DEIS states that because the SOBA is a designated sole-source aquifer, EPA will require a water quality assessment (under Section 1424(e) of the Safe Drinking Water Act) to determine the impact on the quality of the groundwater in the SOBA. The DEIS also states that coordination with EPA to complete the water quality assessment is on-going (pp.5-59,60). However, this statement is premature. Coordination with EPA on the SOBA water quality assessment has not been initiated.

**Recommendation:** The EIS should clearly state the nature and timing of coordination with EPA on SOBA water quality assessment.

TSM Transit Technology

Under the TSM alternative mini-buses "could" use alternative fuel sources, and standard buses would use diesel or diesel/electric hybrids (p. 2-15). By comparison, the BRT alternative will require the use of electric or hybrid/electric vehicles for the In-Town BRT system (pp.2-30 to 2-32).

**Recommendation:** EPA strongly recommends that the City and County of Honolulu commit to using the least polluting fuel sources/technology available for the TSM alternative, as the City has done for the BRT alternative.

BRT Impact to Local Street Network

A Vehicle Screenline Analysis has been performed for the BRT alternative (p. 4-12 to 4-15) using thirteen screenlines established in the project area from Kapiolani to Waikiki. The purpose of this analysis is to evaluate roadway mobility by comparing traffic volume to roadway capacity. The DEIS states, very generally, that the screenline analysis indicates that by 2025 in all alternatives, major roadways will still have traffic bottlenecks, as they do today (p. 4-12). The DEIS does not speak, specifically, to the impact of the removal of currently used lanes of traffic for exclusive use by the In-Town BRT system. As exclusive lanes are dedicated for the In-Town BRT system, drivers may choose to use the local street network and avoid arterial streets. This could lead to congestion on local streets and air quality "hot spots."

## SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

### ENVIRONMENTAL IMPACT OF THE ACTION

#### "LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### "EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

#### "EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### "EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

### ADEQUACY OF THE IMPACT STATEMENT

#### Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 109 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

**Recommendation:** Specifically address the traffic impacts on the local street network that result from the removal of traffic lanes for exclusive bus use in the In-Town project area. Describe any needed mitigation measures.

We have had the opportunity to discuss these issues with Faith Miyamoto, Department of Transportation Services, and have shared some of our suggestions with her.

We appreciate the opportunity to review this Draft EIS. When the Final EIS is completed, please send two copies to me at the address above. If you have any questions or comments, please feel free to contact me or Nova Blazef, the primary staff person working on this project. Nova can be reached at 415-744-2089 or [blazef.nova@epa.gov](mailto:blazef.nova@epa.gov).

Sincerely,



David J. Farrell, Chief  
Federal Activities Office

cc: Donna Turchie, FTA  
Leslie Rogers, FTA  
Laura Kong, FHWA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3001

May 6, 2002

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, HI 96813

Dear Ms. Soon:

The Environmental Protection Agency (EPA) has reviewed the Supplemental Draft Environmental Impact Statement (SDEIS) for the Oahu Primary Corridor Transportation Project, Updated Information on the Refused Bus Rapid Transit (BRT) Alternative, Major Investment Study, in the City and County of Honolulu, Hawaii (CEQ Number: 020107, ERP Number: FTA-K40241-HI). Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. This letter details EPA's concerns.

The Federal Transit Administration and the City and County of Honolulu's Department of Transportation Services propose the construction of a 30.3-mile Bus Rapid Transit (BRT) system, which is comprised of the Regional BRT and In-Town BRT. The Regional BRT corridor is 17.5-miles long and includes extending an existing zipper lane, constructing a contraflow zipper lane, constructing four access-controlled ramps, adding an express lane, and constructing a transit center, a park-and-ride lot, and two transit stops. The In-Town BRT system will operate on existing roads and will use an embedded plate system or hybrid electric propulsion. The SDEIS analyzes refinements to the BRT system. These refinements include:

1. Replacing the Kaonohi Street and Radford Drive ramps with a Luapole Drive ramp;
2. Adding a new In-Town BRT branch; and
3. Rerouting a short section of the University of Hawaii-Manoa In-Town BRT alignment.

In addition to the BRT Alternative, the SDEIS also analyzes a No Build Alternative and a Transportation System Management Alternative. The BRT Alternative is the Preferred Alternative.

EPA reviewed the Draft Environmental Impact Statement (DEIS) in November, 2000 and rated the DEIS *LO - Lack of Objections*. EPA is currently coordinating with your office on potential impacts of the proposed project to the Southern Oahu Basal Aquifer. In a letter dated March 27, 2002, EPA posed a number of questions related to impacts to the aquifer. We anticipate that your office will respond to these questions prior to the publication of the Final

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Environmental Impact Statement. My office has reviewed the current SDEIS, and we have rated the document *LO - Lack of Objections*. In our review we identified opportunities for improving the construction mitigation measures for air quality listed below.

**Construction - Air Quality**

The SDEIS lists a number of excellent construction mitigation measures for air quality. However, given the negative health effects of particulate matter less than 10 microns (PM10), "fugitive dust," and the magnitude of this project, we recommend the following additional mitigation measures:

- Identify sensitive receptor locations in the project area, such as schools, hospitals, parks, and athletic centers. Schedule construction to avoid and minimize impact to sensitive receptor populations, including children, the elderly, infirm, and athletes.
- Reduce the use of diesel-powered equipment. Include mitigation measures that detail how diesel emissions will be minimized for each phase of project construction, especially in sensitive receptor locations. For example, require contractors to keep the equipment fine-tuned, avoid idling, and use alternative fueled vehicles when feasible.
- Identify additional mitigation measures that will be implemented during high winds.

EPA strongly supports projects that improve regional air quality by reducing auto emissions, and we look forward to the successful implementation of this project. EPA appreciates the opportunity to comment on the SDEIS. Please send two copies of the Final Environmental Impact Statement to the address above (Mail Code: CMD-2) when it is filed with EPA's Washington, D.C. office. If you have any questions, please feel free to contact me or Nova Blazej, the point of contact for this project. Nova Blazej can be reached at 415-972-3846 or blazej.nova@epa.gov.

Sincerely,

Lisa B. Hanf, Manager  
Federal Activities Office

cc: Donna Turcotte, Federal Transit Administration  
Genevieve Simonson, Office of Environmental Quality Control  
Faith Miyamoto, Dept. of Transportation Services  
Hillary Hecht, Environmental Protection Agency



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3001

May 6, 2002

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, HI 96813

Dear Ms. Soon:

The Environmental Protection Agency (EPA) has reviewed the Supplemental Draft Environmental Impact Statement (SDEIS) for the Oahu Primary Corridor Transportation Project, Updated Information on the Refined Bus Rapid Transit (BRT) Alternative, Major Investment Study, in the City and County of Honolulu, Hawaii (CEQ Number: 020107, ERP Number: FTA-K40241-HI). Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. This letter details EPA's concerns.

The Federal Transit Administration and the City and County of Honolulu's Department of Transportation Services propose the construction of a 30.3-mile Bus Rapid Transit (BRT) system, which is comprised of the Regional BRT and In-Town BRT. The Regional BRT corridor is 17.5-miles long and includes extending an existing zipper lane, constructing a contrailow zipper lane, constructing four access-controlled ramps, adding an express lane, and constructing a transit center, a park-and-ride lot, and two transit stops. The In-Town BRT system will operate on existing roads and will use an embedded plate system or hybrid electric propulsion. The SDEIS analyzes refinements to the BRT system. These refinements include:

1. Replacing the Kaunohi Street and Radford Drive ramps with a Luapule Drive ramp;
2. Adding a new In-Town BRT branch; and
3. Rerouting a short section of the University of Hawaii-Manoa In-Town BRT alignment.

In addition to the BRT Alternative, the SDEIS also analyzes a No Build Alternative and a Transportation System Management Alternative. The BRT Alternative is the Preferred Alternative.

EPA reviewed the Draft Environmental Impact Statement (DEIS) in November, 2000 and rated the DEIS *LO - Lack of Objections*. EPA is currently coordinating with your office on potential impacts of the proposed project to the Southern Oahu Basal Aquifer. In a letter dated March 27, 2002, EPA posed a number of questions related to impacts to the aquifer. We anticipate that your office will respond to these questions prior to the publication of the Final

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Environmental Impact Statement. My office has reviewed the current SDEIS, and we have rated the document *LO - Lack of Objections*. In our review we identified opportunities for improving the construction mitigation measures for air quality listed below.

Construction - Air Quality

The SDEIS lists a number of excellent construction mitigation measures for air quality. However, given the negative health effects of particulate matter less than 10 microns (PM10), "fugitive dust," and the magnitude of this project, we recommend the following additional mitigation measures:

- Identify sensitive receptor locations in the project area, such as schools, hospitals, parks, and athletic centers. Schedule construction to avoid and minimize impact to sensitive receptor populations, including children, the elderly, infirm, and athletes.
- Reduce the use of diesel-powered equipment. Include mitigation measures that detail how diesel emissions will be minimized for each phase of project construction, especially in sensitive receptor locations. For example, require contractors to keep the equipment fine-tuned, avoid idling, and use alternative fueled vehicles when feasible.
- Identify additional mitigation measures that will be implemented during high winds.

EPA strongly supports projects that improve regional air quality by reducing auto emissions, and we look forward to the successful implementation of this project. EPA appreciates the opportunity to comment on the SDEIS. Please send two copies of the Final Environmental Impact Statement to the address above (Mail Code: CAD-2) when it is filed with EPA's Washington, D. C. office. If you have any questions, please feel free to contact me or Nova Blazej, the point of contact for this project. Nova Blazej can be reached at 415-972-3646 or blazej.nova@epa.gov.

Sincerely,

*Lisa B. Hanz*  
Lisa B. Hanz, Manager  
Federal Activities Office

cc: Donna Turchic, Federal Transit Administration  
Genevieve Salmonson, Office of Environmental Quality Control  
Faith Miyamoto, Dept. of Transportation Services  
Hillary Hochstetler, Environmental Protection Agency

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 521-4339 • Fax: (808) 523-4720 • Internet: www.cc.honolulu.hi.us

EBELYN HARRIS  
MAYOR



CHESTER D. SOON  
DIRECTOR  
GEORGE NEGRO • METAMOTO  
DEPUTY DIRECTOR

TPD11/00-05372R  
TPD5/02-01938R  
TPD5/02-01985R

November 13, 2002

Mr. David J. Farrell, Chief  
Federal Activities Office  
United States Environmental Protection Agency  
Region IX  
75 Hawthorne Street  
San Francisco, California 94105-3801

Dear Mr. Farrell:

Subject: Primary Corridor Transportation Project

This responds to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and the Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your November 2, 2000 letter regarding the MIS/DEIS; Part B responds to your May 6, 2002 letter regarding the SDEIS.

Part A - MIS/DEIS Comments

1. EPA is highly supportive of the Purpose and Need statements, "1. Increase the people-carrying capacity of the transportation system in the primary transportation corridor by providing alternative alternatives to the private automobile" and "2. Support existing development patterns, which include integrated land use and transportation planning designed to reinforce community livability."

Response: Thank you for your support.

2. One of the goals of this project is to shift from auto-oriented, dispersed, single-use development to a land use pattern with a mix of activities that promotes walking and that focuses on a central transit system. EPA applauds the City and County of Honolulu and its State and federal partners for its forward-thinking approach to transportation management in metropolitan Honolulu.

Response: Thank you for supporting the project.

3. The DEIS also states that coordination with EPA to complete the water quality assessment is on-going (pp.5-59, 60). However, this statement is premature. Coordination with EPA on the SOBA water quality assessment has not been initiated. The EIS should clearly state the nature and timing of coordination with EPA on SOBA water quality assessment.

Response: We concur with this comment. The FEIS has been revised to delete this statement. Coordination with the EPA on the SOBA ground water impact assessment is currently on-going, and the Section 1424(e) report has been revised to reflect project refinements.

Mr. David J. Farrell  
Page 2  
November 13, 2002

4. EPA strongly recommends that the City and County of Honolulu commit to using the least polluting fuel sources/technology available for the TSM alternative, as the City has done for the BRT alternative.

Response: The transit technologies provided in the TSM Alternative are minibuses and 40-foot standard and articulated buses. While minibuses could use alternative fuel sources, including electric batteries or propane, standard and articulated buses, particularly the ones used on long-haul routes would need to be diesel or hybrid diesel/electric because of the mountainous terrain and limited range of battery-powered vehicles.

However, it is anticipated that the current vehicle fleet will be replaced incrementally over the next 12 years and at some point during that cycle there may be new technologies that could be integrated into the fleet.

5. The DEIS does not speak, specifically, to the impact of the removal of currently used lanes of traffic for exclusive use by the In-Town BRT system. As exclusive lanes are dedicated for the In-Town BRT system, drivers may choose to use the local street network and avoid arterial streets. This could lead to congestion on local streets and air quality "hot spots." Specifically address the traffic impacts on the local street network that result from the removal of traffic lanes for exclusive bus use in the In-Town project area. Describe any needed mitigation measures.

Response: A characteristic of side streets parallel to major streets throughout Honolulu is the lack of continuity. Therefore, using side streets for through travel is not likely to result in any real time savings. If unique conditions result in isolated neighborhood "cut through" traffic, the City will work with the affected neighborhoods to implement mitigation measures applicable to the LPA (BRT Alternative) are shown in FEIS Table 2.2-8. The analysis of air quality impacts, including potential "hot spots" is described in Sections 3.5 and 5.5 of the FEIS. According to the air quality analysis, there would not be any significant adverse impacts on air quality as a result of the Refined LPA, and there would not be a need for any mitigation measures.

Part B - SDEIS Comments

6. EPA is currently coordinating with your office on potential impacts of the proposed project to the Southern Oahu Bays Aquifer. In a letter dated March 27, 2002, EPA posed a number of questions related to impacts to the aquifer. We anticipate that your office will respond to these questions prior to the publication of the Final Environmental Impact Statement.

Response: A separate response to EPA's March 27, 2002 letter was prepared that included a revised Ground Water Impact Assessment.

7. The SDEIS lists a number of excellent construction mitigation measures for air quality. However, given the negative health effects of particulate matter less than 10 microns (PM10), "fugitive dust," and the magnitude of this project, we recommend the following additional mitigation measures:

- Identify sensitive receptor locations in the project area, such as schools, hospitals, parks, and athletic centers. Schedule construction to avoid and minimize impact to sensitive receptor populations, including children, the elderly, infirm, and athletes.

Mr. David J. Farrel  
Page 3  
November 13, 2002

- Reduce the use of diesel-powered equipment. Include mitigation measures that detail how diesel emissions will be minimized for each phase of project construction, especially in sensitive receptor locations. For example, require contractors to keep the equipment fine-tuned, avoid idling, and use alternative fueled vehicles when feasible.
- Identify additional mitigation measures that will be implemented during high winds.

**Response:** We appreciate the recommended additional PM10 mitigation measures and will, where feasible incorporate them into the project.

We will send you a copy of the FEIS under separate cover. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

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**Final Environmental Impact Statement**

**Primary Corridor Transportation Project**

**Chapter 7.0**

**Comments and Responses  
State Agencies**







STATE OF HAWAII  
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES  
P.O. BOX 118, HONOLULU, HAWAII 96810

APR 12 2002

GLORIA M. OSBORN  
COMPTROLLER  
MARY ALICE EVANS  
DEPUTY COMPTROLLER

LETTER # PWD02.P0185

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813

Dear Ms. Soon:

Subject: Primary Corridor Transportation Project  
Supplemental Draft Environmental Impact Statement

Thank you for the responses you provided us on March 8, 2002. We continue to have concerns about the negative impacts on a portion of the subject project, and since the DTS Response in general does not address our original comments we offer the following:

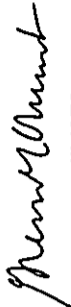
DAGS Comment	DTS Response	DAGS Reply
We are currently working with the Housing and Community Development Corporation of Hawaii (HCDC) to plan the development of our portion of the area located at and around the old OR&L Building near the intersection of King Street and Iwilei Road. Our intent is to construct a Liliha Civic Center to provide office space for state agencies to service the public. As such, we believe: The proposed plan extending Kaaahi Street (at grade) toward Diamond Head to Iwilei Road would result in maximum disruption to the planned civic	The DTS is committed to coordinating with DAGS to ensure that the two projects proceed in a timely manner.	We commend your commitment to coordinate with us. However, if you propose to extend Kaaahi Street thru our site and/or construct a BRT station and/or parking structure on the OR & L /Liliha Civic Center site, the City and County of Honolulu should provide us with an equivalent site (as noted below in our third original comment) or otherwise give fair compensation for our loss.  Please note that the City has yet to commit to an exchange proposal for this and other earlier State land transfers, and further contact by the City with

Ms. Cheryl D. Soon  
PWD02.P0185  
Page 2

DAGS Comment	DTS Response	DAGS Reply
The proposed BRT station and any BRT parking structure on site would also adversely affect the development of the civic center, by increasing traffic around our site and taking up valuable property.	Chapter 4 of the DEIS presents the traffic impacts associated with the BRT project.	Kapalama and Nuuanu screenlines, BRT link volumes, as well as passenger mode of arrival to the Iwilei station data are presented. But still lacking is the negative vehicular impact of the BRT park and ride station at Iwilei and also the BRT negative impact upon nearby streets/intersections.  We commend your commitment to coordinate with us. However, if you propose to extend Kaaahi Street thru our site and/or construct a BRT station and/or parking structure on the OR & L /Liliha Civic Center site, the City and County of Honolulu should provide us with an equivalent site (as noted at left in our
center site. It nearly bisects the property with a roadway that we do not intend to utilize. We question if a Bus Rapid Transit (BRT) easement is required to traverse the site at all (as opposed to remaining on Dillingham Blvd. to and from King St., for example, since the plans for the BRT already take away 2 of the 5 lanes on Dillingham one block away). In lieu of an easement for the roadway, we propose an exchange of road Right-of-Way for county-owned school land.	The DTS is committed to coordinating with DAGS to ensure that the two projects proceed in a timely manner.	That if the city still plans to go ahead with items 1 & 2 above, then the City should consider purchasing the adjacent Ohani property to execute a land swap plus purchase of all improvements with the State. This would provide us with adequate property free of the disruption from increased vehicular traffic.

Should there be any questions, please have your staff call Mr. Bruce Bennett of the Public Works Division at 586-0491.

Very truly yours,



GLENN M. OKIMOTO  
 State Comptroller

- c: The Honorable Bruce Anderson, DOH  
 The Honorable Gilbert Coloma-Agaran, DLNR  
 The Honorable Seiji Naya, DBEDT  
 Ms. Genevieve Salmonson, OEQC  
 Ms. Charlene Unoki, DLNR  
 Mr. Ron Hedani, HCDCH

DAGS Comment	DTS Response	DAGS Reply
<p>Further, we request additional information about the proposed extension. What is the anticipated volume and type of traffic?</p> <p>Will private vehicles be permitted to use Kaaahi Street to cross through the site to Iwilei Road?</p>	<p>The FEIS will refine the traffic conditions associated with implementing the BRT in this location.</p> <p>At this point in project development, private vehicles will not be permitted to use Kaaahi Street to access Iwilei Road.</p>	<p>third original comment) or otherwise give fair compensation for our loss.</p> <p>Please note that the City has yet to commit to an exchange proposal for this and other earlier State land transfers, and further contact by the City with the Department of Land and Natural Resources is needed to remedy these issues.</p> <p>We look forward to the final report to provide the requested information.</p>
<p>Nearly ten years ago, the previous professionally-planned rapid transit project (unfortunately now defunct), was conceived to be above grade in this area, with a station located Ewa off-site, makai of Kaaahi Street to serve this neighborhood. The transit easement alignment would have been much closer to the makai boundary than, for example, an extension of Kaaahi Street provides, and would therefore have impact on our portion of the site.</p>	<p>The FEIS will refine the benefits and impacts associated with implementing the BRT as discussed in the DEIS.</p>	<p>Despite initial construction cost and disruption considerations, we continue to advocate that grade separation for transit through congested areas (such as near this site) would provide the best service to the public. In other words, developing a new at-grade transit system in areas that are already congested is flawed and another opportunity lost.</p>



DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 523-4339 • Fax: (808) 523-4720 • Internet: www.do.tps.honolulu.hi.us



JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE YOUNG LUKALUOTO  
DEPUTY DIRECTOR

TPD402-01439R

November 13, 2002

Mr. Glenn M. Okimoto  
State Comptroller  
State of Hawaii  
Department of Accounting and General Services  
P.O. Box 119  
Honolulu, Hawaii 96810

Dear Mr. Okimoto:

Subject: Primary Corridor Transportation Project

This is in response to your April 12, 2002 letter regarding the comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. We commend your commitment to coordinate with us. However, if you propose to extend Kaaahli Street thru our site and/or construct a BRT station and/or parking structure on the OR&L / Liliha Civic Center site, the City and County of Honolulu should provide us with an equivalent site (as noted below in our third original comment) or otherwise give fair compensation for our loss.

Please note that the City has yet to commit to an exchange proposal for this and other earlier State land transfers, and further contact by the City with the Department of Land and Natural Resources is needed to remedy these issues.

Response: DTS intends to continue to coordinate with DAGS and DLNR to reach a mutually acceptable disposition of property agreement at the subject site.

2. Kapalama and Nuuanu screenlines, BRT link volumes, as well as passenger mode of arrival to the Iwilei station data are presented. But still lacking is the negative vehicular impact of the BRT park and ride station at Iwilei and also the BRT negative impact upon nearby streets/intersections.

Response: There is proposed to be a park-and-ride facility at Iwilei with or without the BRT. There is an EIS being prepared for the Iwilei park-and-ride, and it addresses the traffic impacts of the park-and-ride. Of course, the BRT will serve park-and-ride users as well local and limited stop buses. The BRT enters Hotel Street Transit Mall in the same manner that buses do today. Once on Hotel Street Transit Mall, the BRT would not mix with automobiles and would have minimal impact upon intersection operations.

3. We commend your commitment to coordinate with us. However, if you propose to extend Kaaahli Street thru our site and/or construct a BRT station and/or parking structure on the OR&L / Liliha Civic Center site, the City and County of Honolulu should provide us with an equivalent site (as noted at left in our third original comment) or otherwise give fair compensation for our loss.

Mr. Glenn Okimoto  
Page 2  
November 13, 2002

Please note that the City has yet to commit to an exchange proposal for this and other earlier State land transfers, and further contact by the City with the Department of Land and Natural Resources is needed to remedy these issues.

Response: See response to comment #1.

4. Further, we request additional information about the proposed extension. What is the anticipated volume and type of traffic?

Response: The extension of Kaaahli Street to Iwilei Road would be for BRT vehicles only.

5. We maintain that through-traffic of private vehicles at any time would be detrimental to our civic center.

Response: See response to comment #4.

6. Despite initial construction cost and disruption considerations, we continue to advocate that grade separation for transit through congested areas (such as near this site) would provide the best service to the public. In other words, developing a new at-grade transit system in areas that are already congested is flawed and another opportunity lost.

Response: The concept of a grade-separated transit system was rejected by the public and the City Council at the beginning of the Primary Corridor Transportation Project due to its high cost and visual impacts.

We will send you a copy of the Final Environmental Impact Statement under separate cover. We appreciate your interest in the project.

Sincerely,

*Cheryl D. Soon*  
CHERYL D. SOON  
Director



BENJAMIN J. CAYETANO  
GOVERNOR

**STATE OF HAWAII**

DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT AND TOURISM  
HOUSING AND COMMUNITY DEVELOPMENT CORPORATION OF HAWAII  
677 QUEEN STREET, SUITE 300  
Honolulu, Hawaii 96813  
FAX: (808) 587-0600

SHARVYL MIYASHIRO  
ACTING EXECUTIVE DIRECTOR

ROBERT J. HALL  
ACTING EXECUTIVE ASSISTANT

IN REPLY REFER TO:  
00:PEO/2864

November 13, 2000

Ms. Cheryl D. Soon  
Director  
Department of Transportation Services  
City and County of Honolulu  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813

Re: Primary Corridor Transportation Project

Thank you for the opportunity to review the draft Environmental Impact Statement for the subject project.

We note that the old OR&L site in Iwilei is under consideration for a transit center. While not specifically identified in the draft EIS, we also understand that State land on Hikimoe Street in Waipahu has been identified as a possible transit center. The HCDC is planning to develop an elderly rental project at the old OR&L site in Iwilei. Additionally, HCDC has two existing elderly rental projects and plans for further elderly-related development at our Kau'olu property in Waipahu. The proposed transit centers will directly impact the HCDC's rental housing projects and plans. Therefore, please keep us apprised of the status of the transportation project and, where feasible, let's try to coordinate our planning efforts.

Sincerely,

*Sharvyl Miyashiro*  
Sharvyl Miyashiro  
Acting Executive Director

c: The Honorable Benjamin J. Cayetano, Governor, State of Hawaii  
Robert Bramen, Parsons Brinckerhoff Quade and Douglas, Inc.

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE YEDOU MIYAMOTO  
DEPUTY DIRECTOR

TPD1100-05560R

November 13, 2002

Ms. Sharyn L. Miyashiro  
Acting Executive Director  
State of Hawaii  
Department of Business, Economic Development and Tourism  
Housing and Community Development Corporation of Hawaii  
677 Queen Street, Suite 300  
Honolulu, Hawaii 96813

Dear Ms. Miyashiro:

Subject: Primary Corridor Transportation Project

This is in response to your November 13, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. We note that the old OR&L site in Iwilei is under consideration for a transit center. The HCDC is planning to develop an elderly rental project at the old OR&L site in Iwilei.  
Response: Thank you for the comment. We are aware of the rental project being planned for this site, and have conducted preliminary coordination meetings with HCDC to allow joint use of the OR&L site. We will continue coordinating with the HCDC.

2. While not specifically identified in the draft EIS, we also understand that State land on Hikimoe Street in Waipahu has been identified as a possible transit center. Additionally, HCDC has two existing elderly rental projects and plans for further elderly-related development at our Kau'olu property in Waipahu. The proposed transit centers will directly impact the HCDC's rental housing projects and plans. Therefore, please keep us apprised of the status of the transportation project and, where feasible, let's try to coordinate our planning efforts.  
Response: Thank you for the information; however, this transit center is not part of this project and it has already been constructed.

We will send you a copy of the Final Environmental Impact Statement under separate cover. We appreciate your interest in the project.

Sincerely,

*Cheryl D. Soon*  
CHERYL D. SOON  
Director

BOLUWMI J. GATTELAGO  
COUNCILOR



STATE OF HAWAII  
DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT & TOURISM  
LAND USE COMMISSION

P.O. Box 2359  
Honolulu, HI 96804-2359  
Telephone: 808-587-3322  
Fax: 808-587-3827

August 29, 2000

Ms. Cheryl D. Soon  
Director  
Department of Transportation  
Services  
City and County of Honolulu  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813

Dear Ms. Soon:

Subject: Major Investment Study/Draft Environmental Impact  
Statement for the Primary Corridor Transportation  
Project

We have reviewed the subject document and have the following  
comments:

- 1) As we noted in our comments on the EISPN, the project areas are designated within the State Land Use Urban and Agricultural Districts. We note that Section 3.1 incorrectly refers to the Agricultural District as the "Agriculture" District. The Final EIS should reflect the correct name of the district.
- 2) The Final EIS should include a map showing the project areas under the different alternatives in relation to the State land use districts.

We have no further comments to offer at this time. We appreciate the opportunity to comment on the subject document. Should you have any questions, please feel free to call me or Bert Saruwatari of our office at 587-3822.

Sincerely,

ESTHER UEDA  
Executive Officer

EU:aa

c: OEQC  
Parsons Brinckerhoff Quade and Douglas, Inc.

ESTHER UEDA  
EXECUTIVE OFFICER

RECEIVED  
SEP 5 10:17

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE KEOGI-KAYAMOTO  
DEPUTY DIRECTOR

TPD9/00-04269R

November 13, 2002

Ms. Esther Ueda  
Executive Director  
State of Hawaii  
Department of Business, Economic Development and Tourism  
Land Use Commission  
P.O. Box 2359  
Honolulu, Hawaii 96804-3827

Dear Ms. Ueda:

Subject: Primary Corridor Transportation Project

This is in response to your August 29, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MISDEIS).

1. As we noted in our comments on the EISPN, the project areas are designated within the State Land Use Urban and Agricultural Districts. We note that Section 3.1 incorrectly refers to the Agricultural District as the "Agriculture" District. The Final EIS should reflect the correct name of the district.  
Response: In the FEIS Section 3.1 has been changed from "Agriculture" district to "Agricultural" district.

2. The Final EIS should include a map showing the project areas under the different alternatives in relation to the State land use districts.  
Response: The requested figure is now provided in Section 3.1.5 of the FEIS.

We will send you a copy of the Final Environmental Impact Statement under separate cover. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director



**DEPARTMENT OF BUSINESS,  
ECONOMIC DEVELOPMENT & TOURISM**

RESEARCH AND ECONOMIC ANALYSIS DIVISION  
No. 1 Capitol District Building, 210 South Royal Street, 4th Floor, Honolulu, Hawaii 96813  
Mailing Address: P.O. Box 2388, Honolulu, Hawaii 96804  
Web site: [www.hawaii.gov/dbedt](http://www.hawaii.gov/dbedt)

BENJAMIN J. CAFFRANO  
COMMISSIONER  
SELBY F. MAY  
DEPUTY COMMISSIONER  
SHUNRON MANUMATAZI  
DEPUTY DIRECTOR  
DANIEL W. BLAKE  
DIRECTOR, OFFICE OF TOURISM

Telephone: (808) 586-2448  
Fax: (808) 518-2443

October 9, 2000

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813

Dear Ms. Soon:

Thank you for the opportunity to review the Major Investment Study/Draft Environmental Impact Statement for the Primary Corridor Transportation Project dated August 2000.

We have two comments:

1. Table 1.2-2, page 1-11, indicates a projection of 586,100 for Oahu employment in 2025. This is based on a DBEDT projection of January 1999 that was subsequently updated in February 2000. However, there appear to be two adjustments to DBEDT's projections that are not explained in the report: (1) The employment projection includes an estimate of military personnel that DBEDT did not make, and (2) There appears to be an adjustment for differing estimates of self-employed in the two DBEDT projections.
2. In order to avoid confusion by readers familiar with DBEDT's projections, it would be desirable to note these adjustments. This comment also applies to the Sensitivity Analysis in Section 4.2.5, page 4-19.
3. Section 5.1.5 contains a discussion of economic impacts using multipliers from DBEDT's Input-Output Model. Table 5.1-6 reports "Final Demand Multipliers" on earnings and employment of 0.48 and 11.1, respectively, for the "road construction" industry. The actual Type II final demand multipliers for income and total employment are 0.95 and 27.29, respectively (DBEDT, *The Hawaii Input-Output Study, 1992 Benchmark Report*, Dec. 1998, page 38).

October 9, 2000  
Page 2

4. This will affect the subsequent calculations in Tables 5.1-7 and Tables 5.1-8.

Thank you for this opportunity to comment. If you have questions or concerns, please call me at 586-2470.

Sincerely,

Dr. Pearl Imada Iboshi  
Economic Research Administrator

PJI:CG:tf

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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CHERYL D. SOON  
DIRECTOR  
GEORGE XEON \* ANAUKO  
DEPUTY DIRECTOR

November 13, 2002

TPD1000-04956R

Ms. Pearl Imada Iboshi  
Economic Research Administrator  
State of Hawaii  
Department of Business, Economic Development and Tourism  
Research and Economic Analysis Division  
P.O. Box 2359  
Honolulu, Hawaii 96804

Dear Dr. Iboshi:

Subject: Primary Corridor Transportation Project

This is in response to your October 9, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. Table 1.2-2, page 1-11, indicates a projection of 586,100 for Oahu employment in 2025. This is based on a DBEDT projection of January 1999 that was subsequently updated in February 2000. However, there appear to be two adjustments to DBEDT's projections that are not explained in the report: (1) The employment includes an estimate of military personnel that DBEDT did not make, and (2) There appears to be an adjustment for differing estimates of self-employed in the two DBEDT projections. In order to avoid confusion by readers familiar with DBEDT's projections, it would be desirable to note these adjustments. This comment also applies to the Sensitivity Analysis in Section 4.2.5, page 4-19.

Response: Clarifications have been made to these sections in the FEIS to reflect that the City and County of Honolulu Department of Planning and Permitting adjusts the DBEDT forecasts to reflect military employment and self-employment.

2. Section 5.1.5 contains a discussion of economic impacts using multipliers from DBEDT's Input-Output Model. Table 5.1-6 reports "Final Demand Multipliers" on earnings and employment of 0.48 and 11.1, respectively, for the "road construction" industry. The actual Type II final demand multipliers for income and total employment are 0.95 and 27.29, respectively. This will affect the subsequent calculations in Tables 5.1-7 and Tables 5.1-8.

Response: The forecasts in Section 5.1.5 have been revised to reflect the Hawaii Input-Output Study, 1997 Benchmark Report multipliers.

We will send you a copy of the Final Environmental Impact Statement under separate cover. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

SEANUMI I. CAIYERANG  
COMMISSIONER



STATE OF HAWAII  
DEPARTMENT OF EDUCATION  
P.O. BOX 2380  
HONOLULU, HAWAII 96810

OFFICE OF THE SUPERINTENDENT

September 19, 2000

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813

Dear Ms. Soon:

Subject: Primary Corridor Transportation Project  
Major Investment Study/Draft EIS

The Department of Education has no comment on the subject document.

Thank you for the opportunity to respond.

Very truly yours,

Paul G. LeMahieu, Ph.D.  
Superintendent of Education

PLeM:hy

cc: P. Yoshioka, DAS

BENJAMIN J. CAYetano  
Governor



STATE OF HAWAII  
DEPARTMENT OF EDUCATION  
P.O. BOX 2380  
HONOLULU, HAWAII 96810

OFFICE OF THE SUPERINTENDENT

April 3, 2002

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Dear Ms. Soon:

Subject: Primary Corridor Transportation Project  
Supplemental Draft Environmental Impact Statement (SDEIS)  
TMK: 2-1-015, 058-060; 2-2-004, 007, 009-011; 2-4-002 & 003;  
9-9-002 & 003, 045-048, 064, 075 & 076

The Department of Education has no comment on the SDEIS.

Thank you for the opportunity to respond.

Very truly yours,

*Patricia Hamamoto*  
Patricia Hamamoto  
Superintendent

PH:hy

cc: A. Suga, OBS  
G. Salmonson, OEQC

AN AFFIRMATIVE ACTION AND EQUAL OPPORTUNITY EMPLOYER

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU  
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JEREMY HARRIS  
Mayor

CHERYL D. SOON  
DIRECTOR

GEORGE NEDOM MITAMOTO  
DEPUTY DIRECTOR

TPD9/00-04581R  
TPD/402-01276R

November 13, 2002

Ms. Patricia Hamamoto, Superintendent of Education  
Department of Education  
State of Hawaii  
P. O. Box 2360  
Honolulu, Hawaii 96804

Dear Ms. Hamamoto:

Subject: Primary Corridor Transportation Project

This is in response to your September 19, 2000 and April 3, 2002 letters which advised us that you had no comments regarding the project. We appreciate you taking the time to review the MIS/DEIS and the SDEIS.

We will send you a copy of the Final Environmental Impact Statement under separate cover. We appreciate your interest in the project.

Sincerely,

*Cheryl D. Soon*  
CHERYL D. SOON  
Director



BRUCE E. ANDERSON, Ph.D., M.D., M.P.H.  
DIRECTOR OF HEALTH



STATE OF HAWAII  
DEPARTMENT OF HEALTH  
P.O. BOX 3378  
HONOLULU, HAWAII 96801

November 3, 2000

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
711 Kapiolani Blvd., Suite 1200  
Honolulu, Hawaii 96813

Dear Ms. Soon:

Subject: Major Investment Study/Draft Environmental  
Impact Study  
Primary Corridor Transportation Project  
Oahu

Thank you for allowing us to review and comment on the  
subject project. We do not have any comments to offer at  
this time.

Sincerely,

GARY GILL  
Deputy Director  
Environmental Health Administration

C: OEQC  
Parsons Brinckerhoff Quade & Douglas, Inc.

BRUCE E. ANDERSON, Ph.D., M.D., M.P.H.  
DIRECTOR OF HEALTH



STATE OF HAWAII  
DEPARTMENT OF HEALTH  
P.O. BOX 3378  
HONOLULU, HAWAII 96801

April 18, 2002

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Dear Ms. Soon:

Subject: Draft Environmental Impact Statement (DEIS)  
Primary Corridor Transportation Project  
Tax Map Key: 2-1-015, 058-060; 2-3-004, 007, 009-011; 2-4-002 & 003;  
9-9-002 & 003, 045-048, 064, 075 & 076;

Thank you for the opportunity to review and comment on the subject proposal. The DEIS  
was routed to the various branches of the Environmental Health Administration. We have the  
following comments.

Wastewater Branch (WVWB)

We have reviewed the subject document proposing to identify impacts resulting from Bus  
Rapid Transit (BRT) Alternative refinements. The BRT refinements include:

1. Replacing the Kaonohi Street and Radford Drive ramps with a Luapele Drive ramp;
2. Adding a new In-Town BRT branch (Kakaako Makai Branch) running from the Iwilei  
Transit Center through downtown Honolulu, the Aloha Tower Marketplace, and  
Kakaako Makai en route to Waikiki; and
3. Rerouting a short section of the University of Hawaii-Manoa (UH-Manoa) In-Town  
BRT alignment from Ward Avenue to Pensacola Street.

We have the following comments to offer. Domestic wastewater generation and disposal  
does not seem to be a relevant factor in this draft environmental impact statement. Therefore,  
we have no objections to the proposed alternate refinements.

BRUCE E. ANDERSON, Ph.D., M.D., M.P.H.  
DIRECTOR OF HEALTH

In Reply, Please Refer To  
File  
02-064/epo

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Ms. Cheryl D. Soon, Director  
April 18, 2002  
Page 2

Any wastewater plans must conform to applicable provisions of the Department of Health's Administrative Rules, Chapter 11-62, "Wastewater Systems." We reserve the right to review the detailed wastewater plans for conformance to applicable rules.

Should you have any questions, please contact the Planning/Design Section of the Wastewater Branch at (808) 586-4294.

**Clean Air Branch (CAB)**

**Control of Fugitive Dust:**

Due to the nature of the project, there is a significant potential for fugitive dust to be generated during the removal of debris and during the grading, trenching, and construction activities that would impact nearby businesses, thoroughfares and residents. It is highly recommended that a dust control management plan be developed which identifies and addresses those activities that have a potential to generate fugitive dust. Implementation of adequate dust control measures during all phases of the project is warranted.

Construction activities must comply with provisions of Hawaii Administrative Rules, §11-60.1-33 on Fugitive Dust. The contractor must provide adequate means to control dust from all construction activities including but not limited to:

- a. Planning the different phases of construction, focusing on minimizing the amount of dust-generating materials and activities, centralizing material transfer points and on-site vehicular traffic routes, and locating potentially dusty equipment in areas of the least impact;
- b. Providing an adequate water source at the site prior to start-up of construction activities;
- b. Landscaping and rapid covering of bare areas, including slopes, starting from the initial grading phase;
- d. Controlling of dust from shoulders, project entrances, and access roads;
- e. Providing adequate dust control measures during weekends, after hours, and prior to start-up of construction activities; and
- f. Controlling of dust from debris being hauled away from the project site.

**Proper Disposal of Construction Waste:**

Waste generated by grubbing of the sites and all wastes generated during construction must be disposed of properly. The burning of waste is not permitted.

Ms. Cheryl D. Soon, Director  
April 18, 2002  
Page 3

If you have any questions, please contact the Clean Air Branch at (808) 586-4200.

**Hazard Evaluation and Emergency Response (HEER) Office**

All remedial actions to clean up hazardous substance must comply with Hawaii Revised Statute, Chapter 128D, Environmental Response Law.

If you have any questions, please contact the HEER Office at (808) 586-4249.

**Solid and Hazardous Waste Branch (SHWB)**

The installation of any new Underground Storage Tanks (UST) must comply with existing State, Federal, and City & County Fire Department regulations. The Department of Health has adopted new UST rules requiring a permit for all regulated UST installed after January 28, 2000. For the removal of UST, the Solid and Hazardous Waste Branch (SHWB) must be notified 30 days prior to any activity. The removal of UST must follow the Department of Health guidelines for site assessment following removal activities.

If you have any questions, please contact the Solid and Hazardous Waste Branch at (808) 586-4226.

Sincerely,



GARY GILL

Deputy Director  
Environmental Health Administration

c: WWB  
CAB  
HEER  
SHWB

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 522-4329 • Fax: (808) 522-4720 • Internet: www.cd.honolulu.hi.us

JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE YEOGI - IYAMOTO  
DEPUTY DIRECTOR

Mr. Gary Gill  
Page 2  
November 13, 2002

TPD1100-05413R  
TPD402-01518R

November 13, 2002

Mr. Gary Gill, Deputy Director  
Environmental Health Administration  
Department of Health  
State of Hawaii  
P. O. Box 3378  
Honolulu, Hawaii 96801

Dear Mr. Gill:

Subject: Primary Corridor Transportation Project

This is in response to your November 3, 2000 letter, which advised that you had no comments regarding the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS). We appreciate you taking the time to review it. The following are our comments to your April 18, 2002 letter regarding the Supplemental Draft Impact Statement (SDEIS).

1. We have the following comments to offer. Domestic wastewater generation and disposal does not seem to be a relevant factor in this draft environmental impact statement. Therefore, we have no objections to the proposed alternate refinements. Any wastewater plans must conform to applicable provisions of the Department of Health's Administrative Rules, Chapter 11-62, "Wastewater Systems." We reserve the right to review the detailed wastewater plans for conformance to applicable rules.

2. It is highly recommended that a dust control management plan be developed which identifies and addresses those activities that have a potential to generate fugitive dust. Implementation of adequate dust control measures during all phases of the project is warranted.

Response: We agree that dust control measures are an integral part of all construction activities, as stated in Section 5.12.5 of the SDEIS. Dust control measures, as required by SDOH regulations, will be part of the construction specifications.

3. Construction activities must comply with provisions of Hawaii Administrative Rules, §11-60.1-33 on Fugitive Dust. The contractor must provide adequate means to control dust from all construction activities including but not limited to:

- a. Planning the different phase of construction, focusing on minimizing the amount of dust-generating materials and activities, centralizing material transfer points and on-site vehicular traffic routes, and locating potentially dusty equipment in areas of the least impact;
- b. Providing an adequate water source at the site prior to start-up of construction activities;
- c. Landscaping and rapid covering of bare areas, including slopes, starting from the initial grading phase;

- d. Controlling of dust from shoulders, project entrances, and access roads;
- e. Providing adequate dust control measures during weekends, after hours, and prior to start-up of construction activities; and
- f. Controlling of dust from debris being hauled away from the project site.

Response: Construction specifications will instruct contractors to comply with the referenced regulations.

4. Proper Disposal of Construction Waste. Waste generated by grubbing of the sites and all wastes generated during construction must be disposed of properly. The burning of waste is not permitted.

Response: Waste will be disposed of properly, as suggested in the comment. The Final EIS will be amended to confirm this statement provided by the State DOH.

5. All remedial actions to clean up hazardous substance must comply with Hawaii Revised Statute, Chapter 128D, Environmental Response Law.

Response: Construction specifications will instruct contractors to comply with the referenced regulations.

6. The installation of any new Underground Storage Tanks (UST) must comply with existing State, Federal, and City & County Fire Department regulations. The Department of Health has adopted new UST rules requiring a permit for all regulated UST installed after January 28, 2000. For the removal of UST, the Solid and Hazardous Waste Branch (SHWB) must be notified 30 days prior to any activity. The removal of UST must follow the Department of Health guidelines for site assessment following removal activities.

Response: Any new USTs required will comply with the new guidelines. If any USTs are removed, DOH procedures will be followed during the removal process.

We will send you four copies of the Final Environmental Impact Statement under separate cover. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director



STATE OF HAWAII

DEPARTMENT OF LAND AND NATURAL RESOURCES

HISTORIC PRESERVATION DIVISION  
Kubieberts Building, Room 888  
801 Kaimukii Boulevard  
Honolulu, Hawaii 96813

THOMAS E. JOHNS, CHAIRPERSON  
BOARD OF HISTORIC RESOURCES  
COMMISSION ON WATER RESOURCES MANAGEMENT

DEPUTY  
JULIE E. BARBERO  
LAND, RESOURCES

AQUATIC RESOURCES  
BOATING AND FISH RESOLUTION  
CONSERVATION AND RESOURCES  
RECREATION  
CONVEYANCES  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
LAND  
STATE PARKS  
WATER RESOURCE MANAGEMENT

November 22, 2000

Ms. Cheryl D. Soon, Director  
City and County of Honolulu  
Department of Transportation Services  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813

LOG NO: 26198  
DOC NO: 0009tm02  
Architecture

Dear Ms. Soon:

**SUBJECT: Major Investment Study/  
Draft Environmental Impact Statement (MIS/DEIS)  
Primary Corridor Transportation Project  
TRK: Various, Throughout Oahu**

Thank you for submitting the MIS/DEIS for the above project. Overall, your department and the consultants have been diligent about consulting with our office from the very early stages of planning. While we realize that the plans are still not definite, there are a few reminders and oversights discussed in previous meetings that were not mentioned in the DEIS.

1. The MIS/DEIS indicates that under the TSM alternative no historic properties are likely to be affected. However, the Kam drive-in site is mentioned as a possible transit center. The inclusion of Kam drive-in on the list of historic sites within the Area of Potential Effect is noted in the minutes of a meeting dated October 13, 1999. We believe having a transit center at this site is likely to have an effect on historic resources and would like that noted in the EIS.
2. It is mentioned that the monkey pod trees along Kapiolani Boulevard may be affected by the BRT alternative. As noted in the minutes of a meeting dated June 17, 1999, those trees were part of the historic development of Kapiolani Boulevard as a major thoroughfare and the trees were part of that historic landscaping. Therefore, it should be included as an historic site that may be affected.

3. Also not noted in the DEIS, but were mentioned at various meetings are the mature trees along University Avenue near the University and the lava rock curbs in Honolulu.

Ms. Cheryl D. Soon, Director  
Page Two

4. We understand that the Area of Potential Effect is only the road where there is no transit center or stop which requires a structure. Since this is only in the planning stages, please let us know if the stops or centers change as there are many more historic sites along the route that are currently not identified, such as Kapiolani Park and Sumida Watercross Farm.

5. Section 3.10.2, Description of the Resources. We believe that any ground disturbance exceeding about a meter in depth in the Chinatown and Hawaii Capitol Historic Districts has the potential to adversely affect subsurface cultural deposits, including human burials. In the University of Hawaii Historic District, it is less likely that subsurface cultural layers and deposits, such as historic building foundations, will be encountered. Nonetheless, human burials have been inadvertently discovered during routine construction work on the University of Hawaii at Manoa. The Fort DeRussy area of Waikiki is considered to be of high potential for encountering significant historic sites; we believe that any ground disturbance exceeding a meter in depth is likely to have an "adverse effect" on significant historic sites such as human burials and pre-Contact cultural layers. Therefore, as specific plans are drafted for construction work associated with the PCIP in these Districts and in Waikiki, we request that we be provided copies for review at the earliest opportunity.

With continued consultation, we hope the entire project will have "no adverse effect" on historic properties. Thank you for the opportunity to comment. Should you have further questions, please call Tonia Moy at (808)692-8030 or regarding archaeological concerns Sara Collins at (808)692-8026.

Aloha,

DON HIBBARD, Administrator  
State Historic Preservation Division

TMEjk

c: Dean Uchida, Land Division

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

603 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 523-4329 • Fax: (808) 523-4730 • Internet: www.cc.honolulu.hi.us

JEREMY WARRIS  
ANALYST



CHEVELD, SOON  
DIRECTOR

GEORGE WOODS, MUYALOTO  
DEPUTY DIRECTOR

TPD/12/00-05790R

November 13, 2002

Mr. Don Hibbard, Administrator  
Department of Land and Natural Resources  
Historic Preservation Division  
State of Hawaii  
Kauaihehewa Building, Room 555  
601 Kamehameha Boulevard  
Honolulu, Hawaii 96707

Dear Mr. Hibbard:

Subject: Primary Corridor Transportation Project

This is in response to your November 22, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. The MIS/DEIS indicates that under the TSM alternative no historic properties are likely to be affected. However, the Kam drive-in site is mentioned as a possible transit center. The inclusion of Kam drive-in on the list of historic sites within the Area of Potential Effect is noted in the minutes of a meeting dated October 13, 1999. We believe having a transit center at this site is likely to have an effect on historic resources and would like that noted in the EIS.

Response: The former Kamehameha Drive-In is no longer being considered as a potential transit center site.

2. It is mentioned that the monkey pod trees along Kapiolani Boulevard may be affected by the BRT alternative. As noted in the minutes of a meeting dated June 17, 1999, those trees were part of the historic development of Kapiolani Boulevard as a major thoroughfare and the trees were part of that historic landscaping. Therefore, it should be included as an historic site that may be affected.

Response: We agree that the trees are part of the historic landscape. The appropriate sections in the FEIS have been amended with this information.

3. Also not noted in the DEIS, but were mentioned at various meetings are the mature trees along University Avenue near the University and the lava rock curbs in Honolulu.

Response: Eight young rainbow shower trees in the median of University Avenue between Kapiolani Boulevard and King Street will be relocated on-site. Two other trees fronting Puck's Alley and four at Sinclair Circle will also be relocated.

Two types of sidewalk features were identified by SHPO as worthy of mention - lava rock curbs and Chinese granite sidewalks. Such masonry are historic resources identified as "Hotel Street sidewalk features" in Table 3.10-1 of the MIS/DEIS. Lava rock curbs are found in various places around Honolulu. Street widenings and BRT platform construction will involve removal of historic

Mr. Don Hibbard  
Page 2  
November 13, 2002

sidewalk elements in various locations, including Dillingham Boulevard, Hotel Street, South King Street, and on Saratoga Road in Waikiki. The FEIS reflects the various locations of the historic sidewalk elements in Honolulu.

While most of the Chinese granite sidewalks remaining to date are in Chinatown, none were identified in the locations surveyed along the BRT alignment. However, small pieces of potentially historic granite curbs were identified on the makai side of South King Street, across from the Alapai Transit Center. ▲

SHPD has no specific requirements, policies, or guidelines on how to preserve lava rock curbs and other sidewalk features. However, SHPD does prefer that curbs and other historic sidewalk features be preserved in place as much as possible, including restoration after construction. If retention in place is not possible, they will be removed and stored by the City and County of Honolulu.

4. We understand that the Area of Potential Effect is only the road where there is no transit center or stop which requires a structure. Since this is only in the planning stages, please let us know if the stops or centers change as there are many more historic sites along the route that are currently not identified, such as Kapiolani Park and Sumida Watercross Farm.

Response: Coordination with the SHPD has continued throughout the EIS process and the APE reflects that coordination. As SHPD is aware, some of the transit stops have the potential to cause proximity impacts to certain historic properties. Therefore, further coordination with SHPD will be conducted to avoid, mitigate or lessen these impacts.

5. We believe that any ground disturbance exceeding about a meter in depth in the Chinatown and Hawaii Capitol Districts has the potential to adversely affect subsurface cultural deposits, including human burials.

Response: Section 5.10.2 of the FEIS under the Refined LPA has been revised to disclose the potential for uncovering subsurface archaeological resources, such as cultural layers and deposits and human burials, during construction of the Middle Street maintenance facility and transit center, the Inlet transit center, and at certain sections of the In-Town BRT should embedded plate technology be used. DTS is committed to continuing coordination with SHPD regarding cultural layers and human burials, should any be discovered during construction. Mitigation measures for inadvertent disturbance of burials are addressed in Sections 5.10 and 5.12 of the FEIS.

6. In the University of Hawaii Historic District, it is less likely that subsurface cultural layers and deposits, such as historic building foundations, will be encountered. Nonetheless, human burials have been inadvertently discovered during routine construction work on the University of Hawaii at Manoa.

Response: See response to comment #5.

7. The Fort DeRussy area of Waikiki is considered to be of high potential for encountering significant historic sites; we believe that any ground disturbance exceeding a meter in depth is likely to have an "adverse effect" on significant historic sites such as human burials and pre-Contact cultural layers.



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES

LAND DIVISION  
P.O. BOX 181  
HONOLULU, HAWAII 96818

AGRICULTURE DEVELOPMENT  
AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
CONSERVATION AND  
COURTNEY  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
LAND USE  
STATE PARKS  
WATER RESOURCE MANAGEMENT

September 22, 2000

LD-NAV

Ref.: PRCORDTRANSPRJ.RCM

Honorable Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813

Dear Ms. Soon:

SUBJECT: Draft Environmental Assessment for the Primary Corridor  
Transportation Project, Ewa, Island of Oahu, Hawaii

Thank you for the opportunity to review and comment on the  
subject matter.

Attached herewith is a copy of our Land Division Engineering  
Branch and our Commission on Water Resource Management comments.

The Department has no other comment to offer on the subject  
matter at this time.

Should you have any questions, please feel free to contact  
Nicholas Vaccaro of the Land Division's Support Services Branch  
at 808-587-0438.

Very truly yours,

*Dean Y. Uchida*  
DEAN Y. UCHIDA  
Administrator

C: Oahu District Land Office

Mr. Don Hibbard  
Page 3  
November 13, 2002

Response: See response to comment #5.

8. Therefore, as specific plans are drafted for construction work associated with the PCTP in these  
Districts and in Waikiki, we request that we be provided copies for review at the earliest  
opportunity.

Response: The detailed design plans will be developed during the final design phase of project  
development. Coordination with the SHPD will continue throughout the project design and  
construction phases.

The Department of Land and Natural Resources will receive five copies of the Final Environmental Impact  
Statement under separate cover. We appreciate your interest in the project.

Sincerely,

*Cheryl D. Soon*  
CHERYL D. SOON  
Director

KEULUMU J. CAVEYANG  
Commissioner of Water



THOMAS E. DAVIS  
BRUCE ANDERSON  
ROBERT G. CRAIG  
BRUCE C. HONOLULU  
LIMEL T. NISHIOKA  
LIMEL T. NISHIOKA  
Deputy Director

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT  
P.O. BOX 571  
HONOLULU, HAWAII 96858  
SEP 15 2000

DLNR-LAND DIVISION  
ENGINEERING BRANCH

COMMENTS

LDNAV

Ref: PRICORTRANSPRJ.COM

Since several areas in the study area are within the 100- or 500-year base flood plains, the proposed project must comply with rules and regulations of the National Flood Insurance Program (NFIP) and all applicable County Flood Ordinances. If there are questions regarding the NFIP, please contact the State Coordinator, Sterling Yong, of the Department of Land and Natural Resources at 587-0248. If there are questions regarding flood ordinances, please contact the applicable County representative.

TO: Dean Y. Uchida, Administrator  
Land Division

FROM: Linnel T. Nishioka, Deputy Director  
Commission on Water Resource Management

SUBJECT: Draft Environmental Assessment, Primary Corridor Transportation Project  
City and County of Honolulu, Department of Transportation Services, Oahu

This is in response to your memorandum dated, August 31, 2000, requesting comments on the Draft Environmental Assessment (DEA) for the Primary Corridor Transportation Project.

The DEA acknowledges that stream channel alteration permits may be required if the Bus Rapid Transit alternative is selected (Table 7.5-1). The preliminary nature of the Environmental Assessment does not provide specific information regarding stream modifications. When more specific information is provided, we will offer more detailed comments on the need for stream channel alteration permits.

Thank you for coordinating with us. Should you have any questions, please call David Higa of the Commission staff at 587-0249.

DH:sd

SEP 15 2 55 PM '00



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES

LAND DIVISION  
P.O. BOX 511  
HONOLULU, HAWAII 96809

April 3, 2002

PLANNING AND  
CONSTRUCTION  
CONSERVATION AND  
RECREATION  
LAND DIVISION  
STATE PLANNING  
WATER RESOURCE MANAGEMENT

LD-NAV  
Ref.: SDEISDSCORRIDOR.RCH

Honorable Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813

Dear Ms. Soon:

**SUBJECT:** Review: Supplemental Draft Environmental Impact Statement  
Applicant: Department of Transportation Services C&Coh  
Project: Primary Corridor Transportation Project  
Location: Island of Oahu, Hawaii  
TRK: 1<sup>st</sup>/ 2-1-015, 065-060/ 2-3-004, 007, 009-011/ 2-4-002 &  
003; 9-9-002 & 003, 045-048, 064, 075 and 074 (Plats)

Thank you for the opportunity to review and comment on the subject matter.

A copy of the document covering the proposed project was transmitted to the following Department of Land and Natural Resources' Divisions for their review and comment:

- Division of Aquatic Resources
- Division of Forestry & Wildlife
- Division of State Parks (RD)
- Historic Preservation Division (RD)
- Commission on Water Resource Management (RD)
- Land Division Engineering Branch
- Land Division Planning and Technical Services
- Oahu District Land Office

Attached herewith is a copy of the Land Division Engineering Branch comment.

The Department has no other comment to offer at this time.

Should you have any questions, please feel free to contact Nicholas A. Vaccaro of the Land Division Support Services Branch at 587-0438.

Very truly yours,

*Nicholas A. Vaccaro*  
NICHOLAS A. VACCARO  
Administrator

C: Oahu District Land Office

DLNR-LAND DIVISION  
ENGINEERING BRANCH

COMMENTS

LD/NAV

Ref.: PRICORTRANSRJ.COM

Since several areas in the study area are within the 100- or 500-year base flood plains, the proposed project must comply with rules and regulations of the National Flood Insurance Program (NFIP) and all applicable County Flood Ordinances. If there are questions regarding the NFIP, please contact the State Coordinator, Sterling Yong, of the Department of Land and Natural Resources at 587-0248. If there are questions regarding flood ordinances, please contact the applicable County representative.

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DEPARTMENT OF TRANSPORTATION SERVICES  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE KEONG \* LIYALALOTO  
DEPUTY DIRECTOR

TPD9/00-04670R  
TPD402-01376R

November 13, 2002

Ms. Dieder S. Mamiya, Administrator  
Department of Land and Natural Resources  
Land Division  
State of Hawaii  
P. O. Box 621  
Honolulu, Hawaii 96809

Dear Ms. Mamiya:

Subject: Primary Corridor Transportation Project

This is in response to your September 15 and September 22, 2000, and April 3, 2002 letters regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). Your letters also referred us to a copy of the Land Division Engineering Branch and Commission on Water Resource Management memo.

1. *The preliminary nature of the Environmental Assessment does not provide specific information regarding stream modifications. When more specific information is provided, we will offer more detailed comments on the need for stream channel alteration permits.*

*Response:* The Kapalema Stream bridge on Dillingham Boulevard will not be widened; however, the project will require that an additional beam be installed to reinforce the structure. This work will be accomplished without modifying or altering the stream.

2. *Since several areas in the study area are within the 100- or 500-year base flood plains, the proposed project must comply with rules and regulations of the National Flood Insurance Program (NFIP) and all applicable Flood Ordinances.*

*Response:* The Final Environmental Impact Statement (FEIS) will affirm this commitment to the rules and regulations of NFIP and applicable County Flood Ordinances in Section 5.8.3.

The Department of Land and Natural Resources will receive five copies of the Final Environmental Impact Statement under separate cover. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

W. LAUREN J. CAVETTANO  
GOVERNOR



STATE OF HAWAII  
DEPARTMENT OF TRANSPORTATION  
468 PUNCHBOWL STREET  
HONOLULU, HAWAII 96813-5097

November 3, 2000

Ms. Cheryl Soon  
Director  
Department of Transportation Services  
City and County of Honolulu  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813

Dear Ms. Soon:

Subject: Primary Corridor Transportation Project, Draft EIS

Thank you for the opportunity to review the Draft EIS for the Primary Corridor Transportation Project (PCTP). The project has many worthwhile features and we are in general support of it. However, we do have some concerns with the scope of the improvements, cost estimates, and implementation strategy, which need to be addressed and refined.

Our comments are as follows:

1. Full disclosure of the impacts to the non-transit users must be presented. The non-transit users should be appraised of the traffic congestion and delays they can expect with the pre-emption of traffic lanes and timing signals, especially since there is no plan to mitigate the adverse impacts.

Peak and non-peak traffic congestion information, in delay time and by roadway segments, should be included in the report; and because the implementation of the total system is critical to the system's performance, and it is highly doubtful that the total system is implemented within a ten-year timeframe, information on the impacts during the interim period as well as upon completion of the system should be provided.



1959 2000

KAZU HAYASHIDA  
DIRECTOR  
DEPUTY DIRECTOR  
BRUCE K. LUNAN  
GLENN H. OKUMOTO

BY REPLY REFER TO:  
DIR 1.110300

Additionally,

- a. The evaluation measures include a breakdown of transit travel time by segments (i.e., between Downtown and Kapolei; Downtown and Waikiki; Downtown and UH-Manoa; and Downtown and Kalihi). A similar breakdown by roadway segments of auto travel time should be provided and discussed.
  - b. The discussion on federal highway funding states that less than 20 percent of the total annual highway funding would be used for the project. While this may be true on a statewide basis, information should be provided which sets the project more appropriately within the context of funds available for metropolitan Honolulu, and for use on capital improvement projects.
  - c. The report further states that no major capital projects would be deferred if either the TSM or BRT Alternatives were selected. This is not true.
2. The highway elements reflected in the alternatives are understated. Generally, only those projects programmed for implementation within the next three years were included in the analyses. Other highway projects identified in the current ORTP are underway and should also be reflected, including the Waimalu Viaduct widening, Nimitz Viaduct, the Freeway Management System, Ward Avenue Extension, and various ramp and interchange improvements. Additional projects have also been identified for the Ewa region.

3. Scope of the highway improvements and cost estimates need to be refined.

- a. It has been the HDOT's commitment to the FHWA that we would improve the Interstate to standard. Where construction on the Interstate is required to support the transit alternative, the project should include restoring the segment to standard, including preservation/maintenance and safety measures, as may be required. This needs to be factored into the project scope and cost estimates.

- b. With the limitations on our fiscal and staffing resources, it would not be reasonable to assume that the highway elements of the project can be implemented within the ten-year time frame presented in the report. The list of projects requiring State and FHWA funds, and staff resources far exceed what is available. The commitment of State and Federal Highway funds needs to be resolved; policy decisions are yet to be made committing to the level of funding and timetable required for the project. Moreover, our engineers estimate the costs to be substantially higher than the \$200 million of FHWA and State funds assumed in the report.

- c. Various concerns on the deployment of the afternoon zipper lane remain outstanding. These include the adverse impacts to the inbound traffic, and the entire scope of work required for the zipper project itself (due to related improvements). The project does not adequately address the substandard design and use of the shoulder lane, required structural support, modifications to existing interchanges for zipper lane access, and mitigation measures to address problems resulting from removal of the permanent median barriers (such as headlight glare).

4. Strategies for implementation need to be reconsidered. The planned higher density in the urban core, and pre-emption of traffic lanes and timing signals will intensify the congestion problems, creating possible gridlock. In concept, this will increase the diversion to transit. In reality, the diversion will not occur until the entire system is in place (otherwise, there would be no time savings); and the costs and time schedules appear to be overly optimistic. We cannot afford to be in gridlock for an extended "interim" period. The phasing of the project should be reconsidered to avoid taking of lanes until the final phases. Also, there would be those motorists unable to divert to a transit alternative, such as freight movers and parents with student drop-offs. Reasonable alternatives or provisions for these "captive" auto users should be developed.

We have included in this letter our specific recommendations on what believe would be a more viable implementation strategy.

5. The Honolulu International Airport (HNL) is a major trip attractor and employment site. Its patrons will not have access to the BRT since the nearest transit centers are at Pearl City and Iwilei. Accommodations to provide a link to the HNL should be investigated.

Recommendations:

The DEIS eliminates the highway only alternative and essentially pursues transit only alternatives. A more prudent approach may be to look at a combination of both. An enhanced transit system is definitely needed to address our congestion problems; but highway improvements are also required. A systematic, integrated implementation of both transit and highway improvements should be pursued.

- A. HDOT is aggressively pursuing the Waimalu Viaduct widening project, which is scheduled for completion in 2004. This will provide some relief for outbound afternoon traffic. Discretionary funds have been earmarked for the project. Aside from adding an additional lane between the Kaonohi Overpass and Pearl City Off-ramp, this project will restore the Interstate to standards, and include preservation/maintenance, structural reinforcement and other safety measures, as may be required.

Ms. Cheryl Soon  
Page 4  
November 3, 2000

DIR 1.110300

The proposed PM zipper and other outbound transit improvements should be deferred until the effectiveness of the Waimalu project can be assessed. (The PM peak is also not the critical peak and resources should be first directed to the inbound morning congestion.)

B. For the inbound morning traffic, we need to further examine the travel time to the proposed transit centers. It would appear that the bottlenecks and congestion are concentrated at the outskirts of Downtown, with the back up beginning at Middle Street. If we can provide improved accesses to the transit centers, and incentives for the motorists to change modes at these centers, the number of vehicles entering Downtown could be reduced (e.g., reduced parking rates at the centers; employer sponsored bus passes, etc.). This can be done with or without the In-town BRT.

This strategy would mean continuing the bus service for the transit riders from the origin sites; and building up the transit centers and providing service from there for motorists who change modes enroute to their destinations. This should be done before implementing the In-town BRT because it may provide some congestion relief before pre-empting any lanes and causing a prolonged gridlock situation.

In the meantime, HDOT does intend to pursue the Nimitz Viaduct project, which would further relieve congestion during the implementation of the In-town BRT.

This type of strategy, an incremental implementation of the transit alternative, would not only allow us to spread out our financial and staffing resources, but more importantly, to re-evaluate the different phases of the total project and reassess the assumptions made.

We would be pleased to further discuss our comments and look forward to working with you on this project.

Sincerely,

KAZU HAYASHIDA  
Director of Transportation

- c: FTA, FHWA, OMFO
- Hon. Benjamin J. Cayetano
- Hon. Daniel Inouye
- Hon. Neil Abercrombie
- Hon. Cal Kawamoto
- Hon. Kenneth Hiraki

BENJAMIN J. CAYETANO  
GOVERNOR



STATE OF HAWAII  
DEPARTMENT OF TRANSPORTATION  
889 PUNCHBOWL STREET  
HONOLULU, HAWAII 96813-5097

MAY 7 2002

MAY - 7 2002

BRUNYK MUSAJI  
DIRECTOR  
DEPUTY DIRECTORS  
JEAN L. OSHITA  
JADINE Y. URASAO

IN REPLY REFER TO:  
HWY-PS  
2.6532

DTS  
TRANS PLANNING  
MAY 7 4 29 PM '02

Ms. Cheryl D. Soon  
Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Dear Ms. Soon:

Subject: Primary Corridor Transportation Project Supplemental Draft Environmental Impact Statement (DEIS)

The following comments address the March 2002 Supplement DEIS, your January 16, 2002 response to our comments on the Supplemental DEIS Preparation Notice (HWY-PS 2.4594), and the January 18, 2002 Primary Corridor Transportation Project Bus Rapid Transit Alternative Final Conceptual Design Drawings (Technical Appendix B) which we received on February 19, 2002. They clarify and supplement our previous letters dated November 3, 2000 (DIR 1.110300), October 24, 2001 (HWY-PS 2.4594), and April 15, 2002 (HWY-PS 2.6197)

PREVIOUS COMMENTS

The following points address major concerns we have previously raised.

I. HDOT POSITION ON THE IN-TOWN BRT

As stated in our letters dated November 3, 2000 and April 15, 2002, before the City decides to implement actions which may adversely impact existing motorists, your EIS needs to fully disclose, and the public needs to be adequately informed of, traffic impacts which immediately will occur when measures are taken to give the In-Town BRT priority over other traffic. To date, sufficient information has not been provided in the City's EIS documents. We are especially concerned about traffic impacts to the State highway system when the In-Town BRT is implemented on King Street and Dillingham, Kapiolani, and Ala Moana Boulevards. As further indicated in our letter dated April 15, 2002, details of all proposed improvements within the State highway right-of-way (ROW) must be submitted for our review and approval.

Our Harbors Division strongly objects to any loss of prime harbor property makai of Ala Moana Boulevard because of potential constraints to container yard and cruise ship operations. As indicated in our letters dated October 24, 2001 and April 15, 2002, we request that the Final EIS fully address their concerns. Although the proposed Pier 2 Cruise Ship Terminal has been postponed, please consult the U.S. Coast Guard concerning design requirements, access limitations, and parking restrictions necessary to maintain security between the proposed Terminal and Ilalo Street.

## 2. INFORMATION THAT SHOULD BE PROVIDED IN THE FINAL EIS

We requested the following information in our October 24, 2001 comments on the Supplemental DEIS Preparation Notice, but have not yet received a satisfactory response. We have restated or expanded some points so there will be no misunderstanding. If not provided in the Final EIS, requested information about the Regional BRT must be addressed in a future Supplemental DEIS.

- a. The Final EIS needs to update previous information about where and when the City proposes to convert existing traffic lanes to contra-flow and/or BRT use. There needs to be full, clear public disclosure of where roadway capacity would be lost or reduced and how this capacity displacement will be accommodated through the City's proposed mitigation strategies. Table 2.2-4 should be expanded to include a comprehensive summary of where and when EIS proposals for contra-flow would affect existing laneage on State highways, and when and where EIS proposals would affect existing contra-flow laneage on Kapiolani Boulevard.
- b. At the time existing traffic lanes are initially converted to exclusive use by the proposed In-Town BRT and existing traffic signals are modified to give priority to the In-Town BRT:
  - Which intersections and roadways will have reduced levels of service?
  - How will traffic signal coordination and progression be affected and what are the potential impacts to ITS and traffic flow on the surrounding highway system?
  - What will be the cumulative impacts on the duration and severity of traffic congestion at screen lines?
  - What will be the cumulative impacts in terms of vehicle travel time delay along the major arterials where BRT operations will reduce roadway capacity?
  - What share of trips will be made by bus?
  - How many drivers will be worse off and how much more travel delay will they experience?
  - How many bus riders will be better off and how much less travel delay will they experience?

- c. The Final EIS needs to evaluate the noise impacts, between the Pearl Harbor Interchange and the Waiawa Interchange, resulting from increased peak afternoon traffic volumes when the proposed westbound zipper lane is deployed on Interstate H-1.
- d. The Final EIS needs to compare the benefits, costs, and drawbacks of full compliance with Interstate Standards for each proposed Design Exception. Full compliance with Interstate Standards is normally a reasonable alternative to Design Exceptions. Unless adequate justification is provided, we cannot support and FHWA may not grant even a temporary Design Exception for substandard at-grade highway shoulders.
- e. The Final EIS needs to describe likely temporary construction-related impacts to the State highway system. Off-peak construction may not be sufficient to mitigate impacts. Other congestion mitigation strategies must be provided for construction-related impacts.
- f. The Final EIS needs to include estimates of daily boardings and alightings at the Aloha Stadium Transit Center by bus-riders using the proposed Luapele Drive ramp at the time when the City proposes that this ramp be completed. The Final EIS should include similar estimates for the proposed Kunia and Kapolei ramps at the time when the City proposes that these ramps be completed. And Table 4.1-7 should include similar estimates for all three ramps in 2025.

## 3. PRIORITIES FOR FHWA FUNDS

We would like to clarify statements about HDOT priorities in our letters dated November 3, 2000 and October 24, 2001. Unlike the City, we have a statewide system and need to meet statewide demands. Our highest priority is to maintain existing State highways and keep them safe. Our next priority is to make incremental improvements to benefit existing highway users. Unfortunately, our statewide needs far exceed available State and FHWA funds.

The Oahu Metropolitan Planning Organization Policy Committee will approve the amount of Oahu FHWA and FTA funds available for the BRT or other projects. Over the past decade, the City has received an average of about \$10 million/year of some kind of FHWA funds for a variety of projects including road resurfacing, road widening, new roads, traffic signals, traffic surveillance cameras, bikeways, bridges, street trees, underground utilities, and acquisition of shoreline property. In the future, the BRT will compete with other eligible, desirable projects for use of FHWA funds.

#### RECOMMENDATIONS

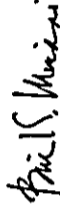
1. Previous and current HDOT comments must be addressed to our satisfaction.
2. Much more information is available to describe and evaluate the environmental impacts of the proposed Middle Street ramp and the proposed In-Town BRT than the proposed Regional BRT. Further analysis and a future Supplemental DEIS will be required for several key components of the Regional BRT.
3. The Final EIS needs a technical appendix to explain the assumptions and methodology used to quantify:
  - travel demand.
  - peak spreading / duration of traffic congestion.
  - screen line capacity and level of service.
  - reductions in screen line throughput due to downstream congestion.
  - transit mode share.
  - vehicle miles of travel.
  - vehicle hours of delay.
  - screen line "person-carrying capacity".
  - transit boardings per linked trip.
  - measures for traffic signal prioritization.

The technical appendix also needs to document that traffic forecasting models used for the EIS reasonably reflect the duration and severity of traffic congestion, transit mode share, vehicle miles of travel, and vehicle hours of delay under existing conditions.

4. The City should coordinate the BRT project with current HDOT projects to extend the existing morning H-1 zipper lane and provide peak morning eastbound contra-flow on Nimitz Highway.

If you have any questions, please contact Ronald Tsuzuki, Head Planning Engineer, Highways Division, at 587-1830.

Very truly yours,

  
BRIAN K. MNAAI  
Director of Transportation

Enclosures: HWY-PS 2.6197, HWY-PS 2.4594, DIR 1.110300

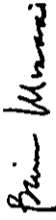
c: FHWA, FTA, OMPO, OEQC, Senator Daniel Inouye, Senator Dan Akaka,  
Representative Paisy Mink, Representative Neil Abernombie all w/enclosure

DIR 0518  
HWY-PS  
2.6197

APR 15 2002

If you have any questions, please contact Ronald Tsuzuki, Head Planning Engineer, Highways Division, at 587-1830.

Very truly yours,



BRIAN K. MINAKAI  
Director of Transportation

c: City Department of Planning and Permitting  
City Department of Transportation Services  
Hawaii Community Development Authority

DM: mm

bc: DEP-P, -S, STP, PPB, HAR, HWY, -O, -T, -D, -C, -R, -S, -PA, -PS (02-076)

The Honorable John DeSoto  
Chair and Members  
Honolulu City Council  
City and County of Honolulu  
530 South King Street  
Honolulu, Hawaii 96813

Dear Chairman DeSoto and Members:

Subject: Development Plan Public Facilities Map Amendment (2002/DPPFM-5) for the Primary Urban Center Bus Rapid Transit (BRT) Iwilei to Waikiki Alignment, Honolulu, Oahu

Thank you for consulting us concerning the proposed Development Plan Facilities Map Amendment.

We support expanded provision of limited-stop bus service and conversion of overlapping bus routes to a hub-and-spoke system. However, before the City decides to take away traffic lanes from existing motorists, the City needs to fully disclose, and the public needs to be adequately informed of, traffic impacts which will occur at the time traffic lanes are initially converted to exclusive use by the proposed BRT. To date, this information has not been provided in the City's EIS documents.

All plans for work within the State highway right-of-way must be coordinated and submitted to our Highways Division for our review and approval. The proposed BRT alignment uses portions of Nimitz Highway and Ala Moana Boulevard—which are both State highways.

We consulted the Hawaii Community Development Authority (HCDA) and our Harbors Division concerning proposed BRT use of their property makai of Ala Moana Boulevard. The HCDA will not consent to the City proposal to extend Ilalo Street to Channel Street because the alignment would not be consistent with their adopted plan. However, they probably would welcome City assistance to implement their plan to extend Ilalo Street to Punchbowl Street. Our Harbors Division wishes to minimize constraints on container yard and cruise ship operations. Although the proposed Pier 2 Cruise Ship Terminal has been postponed, the City needs to consult the U.S. Coast Guard concerning design requirements, access limitations, and parking restrictions necessary to maintain security between the proposed Terminal and Ilalo Street.

~ ~ ~

# CORRECTION

THE PRECEDING DOCUMENT(S) HAS  
BEEN REPHOTOGRAPHED TO ASSURE  
LEGIBILITY  
SEE FRAME(S)  
IMMEDIATELY FOLLOWING

### RECOMMENDATIONS

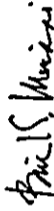
1. Previous and current HDOT comments must be addressed to our satisfaction.
2. Much more information is available to describe and evaluate the environmental impacts of the proposed Middle Street ramp and the proposed In-Town BRT than the proposed Regional BRT. Further analysis and a future Supplemental DEIS will be required for several key components of the Regional BRT.
3. The Final EIS needs a technical appendix to explain the assumptions and methodology used to quantify:
  - travel demand.
  - peak spreading / duration of traffic congestion.
  - screen line capacity and level of service.
  - reductions in screen line throughput due to downstream congestion.
  - transit mode share.
  - vehicle miles of travel.
  - vehicle hours of delay.
  - screen line "person-carrying capacity".
  - transit boardings per linked trip.
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The technical appendix also needs to document that traffic forecasting models used for the EIS reasonably reflect the duration and severity of traffic congestion, transit mode share, vehicle miles of travel, and vehicle hours of delay under existing conditions.

4. The City should coordinate the BRT project with current HDOT projects to extend the existing morning H-1 zipper lane and provide peak morning eastbound contra-flow on Nimitz Highway.

If you have any questions, please contact Ronald Tsuzuki, Head Planning Engineer, Highways Division, at 587-1830.

Very truly yours,

  
BRIAN K. MINNAJI  
Director of Transportation

Enclosures: HWY-PS 2.6197, HWY-PS 2.4594, DIR 1.110300

c: FHWA, FTA, OMPO, OEQC, Senator Daniel Inouye, Senator Dan Akaka,  
Representative Patsy Mink, Representative Neil Abercrombie all w/enclosure

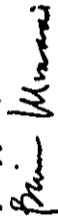


DIR 0518  
HWY-PS  
2.6197

APR 15 2002

If you have any questions, please contact Ronald Tsuzuki, Head Planning Engineer, Highways Division, at 587-1830.

Very truly yours,



BRIAN K. MINA'AI  
Director of Transportation

c: City Department of Planning and Permitting  
City Department of Transportation Services  
Hawaii Community Development Authority

DM: mm

bc: DEP-P, -S, STP, PPB, HAR, HWY, -O, -I, -D, -C, -R, -S, -PA, -PS (02-076)

The Honorable John DeSoto  
Chair and Members  
Honolulu City Council  
City and County of Honolulu  
530 South King Street  
Honolulu, Hawaii 96813

Dear Chairman DeSoto and Members:

Subject: Development Plan Public Facilities Map Amendment (2002/DPPFM-S) for the  
Primary Urban Center Bus Rapid Transit (BRT) Iwilei to Waikiki Alignment,  
Honolulu, Oahu

Thank you for consulting us concerning the proposed Development Plan Facilities Map Amendment.

We support expanded provision of limited-stop bus service and conversion of overlapping bus routes to a hub-and-spoke system. However, before the City decides to take away traffic lanes from existing motorists, the City needs to fully disclose, and the public needs to be adequately informed of, traffic impacts which will occur at the time traffic lanes are initially converted to exclusive use by the proposed BRT. To date, this information has not been provided in the City's EIS documents.

All plans for work within the State highway right-of-way must be coordinated and submitted to our Highways Division for our review and approval. The proposed BRT alignment uses portions of Nimitz Highway and Ala Moana Boulevard—which are both State highways.

We consulted the Hawaii Community Development Authority (HCDA) and our Harbors Division concerning proposed BRT use of their property makai of Ala Moana Boulevard. The HCDA will not consent to the City proposal to extend Ilalo Street to Channel Street because the alignment would not be consistent with their adopted plan. However, they probably would welcome City assistance to implement their plan to extend Ilalo Street to Punchbowl Street. Our Harbors Division wishes to minimize constraints on container yard and cruise ship operations. Although the proposed Pier 2 Cruise Ship Terminal has been postponed, the City needs to consult the U.S. Coast Guard concerning design requirements, access limitations, and parking restrictions necessary to maintain security between the proposed Terminal and Ilalo Street.

cc 076



DIR 1442  
HWY-PS  
2.4594

OCT 24 2001

Ms. Cheryl D. Soon  
Director  
Department of Transportation Services  
City and County of Honolulu  
711 Kapiolani Boulevard, Suite 702  
Honolulu, Hawaii 96813

Dear Ms. Soon:

Subject: Primary Corridor Transportation Project, Supplemental Draft Environmental Statement (DEIS) Preparation Notice

Thank you for the opportunity to review the Preparation Notice for the Supplemental DEIS.

We request that you respond to our previous comments (DIR 1.110300, dated 11/3/00) on the Draft EIS and (DIR 1.015, dated 3/16/01), which includes further comments regarding the Primary Corridor Transportation project. Further comments are listed below:

1. Because our statewide needs far exceed our limited resources, we cannot commit State highway funds for the Bus Rapid Transit (BRT) project.
2. The Supplemental DEIS needs to update previous information about where and when the City proposes to convert existing traffic lanes to contra-flow and/or to BRT use.
3. At the time traffic lanes are initially converted to exclusive use of the proposed In-Town BRT:
  - Which intersections and roadways will have reduced levels of service?
  - What will be the cumulative impacts on the duration and severity of traffic congestion at screenlines?
  - How many drivers will be worse off and how much more travel delay will they experience?
  - How many bus riders will be better off and how much less travel delay will they experience?

4. The Supplemental DEIS needs to address the impacts of the proposed makai Kakaako BRT route on cargo and cruise ship operations at Pier 2.
5. At the westbound approach to the Waiala Interchange, deployment of the eastbound zipperlane reduces Interstate H-1 to a single westbound lane. The Supplemental DEIS should determine necessary improvements so that deployment of the eastbound zipperlane does not cause a bottleneck for morning westbound traffic in 2025. Proposed improvements also must not preclude construction of an additional lane to off-ramp 8-B to Waipahu.
6. Please describe the timing and nature of improvements needed on Nimitz Highway to accommodate the proposed extension of the eastbound zipperlane into Keehi Interchange.
7. Please evaluate the noise impacts resulting from increased peak afternoon traffic volumes when the proposed westbound zipperlane is deployed on Interstate H-1.
8. Within the existing Waiala and Waiala Interchanges, where there is no shoulder lane, deployment of the proposed westbound zipperlane would narrow Interstate H-1 to three eastbound lanes. Please verify that there will be acceptable levels of service for eastbound traffic through these interchanges when the proposed westbound zipperlane is initially deployed. We also request that you evaluate when and how these interchanges will need to be widened so that deployment of the proposed westbound zipperlane will not cause a bottleneck for increasing eastbound traffic volumes.
9. Full compliance with Interstate Standards is normally a reasonable alternative to Design Exceptions. Hence, you need to compare the benefits, costs, and drawbacks of full compliance with Interstate Standards with the benefits, costs, and drawbacks for each proposed Design Exception. Unless compelling justification is provided, we may not support and FHWA may not grant even a temporary Design Exception for substandard at-grade highway shoulders.
10. According to the Preparation Notice, new ramps and freeway widening are proposed for exclusive BRT access to Interstate Route H-1 from a proposed Kapiolani Interchange, a proposed transit center near the Kuniia Interchange, Luapele Drive near the Stadium, and the Radford Drive overpass. According to the Preparation Notice, a new ramp is also proposed for unrestricted vehicular access from Interstate Route H-1 to a proposed City transit center near Middle Street.

Ms. Cheryl D. Soon  
Page 3

HWY-PS 2.4594

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HIGHWAYS DIVISION

For each of these locations, we request that the Supplemental DEIS separately:

- provide updated plans showing proximity to other ramps.
- provide updated cost estimates.
- describe temporary construction-related impacts to freeway traffic and what mitigation measures are proposed.
- describe long-term environmental impacts and mitigation measures.
- describe what traffic movements would be allowed on the proposed ramp.
- explain how the BRT would be routed if no zipperlane were deployed and/or the proposed ramp were temporarily unusable.
- estimate daily bus riders using the proposed ramp, both when initially constructed and in 2025.
- estimate the drop in projected daily bus ridership if the proposed ramp were not constructed.
- estimate peak traffic volume on the proposed ramp and the lane into which the ramp would merge in 2025.
- assess design features and traffic controls necessary for articulated buses to safely enter and exit the proposed ramp.

Much of this information will also be needed for a formal Justification Report which must be submitted for our concurrence and FHWA approval before new access is allowed to our Interstate system.

If you have any questions, please contact Ronald Tsuzuki, Head Planning Engineer, Highways Division, at 587-1830.

Very truly yours,

*Brian K. Minnai*  
BRIAN K. MINNAI  
Director of Transportation

Enclosures (DIR 1.110300 and DIR 1.015)

c: Office of Environmental Quality Control (w/attach), FHWA (w/attach.)

DM:mum

bc: DEP-J, PPB, STP, HWY, -T, -D, -PA, -PS (01-233) all w/attach.  
DIR, H&B, HWY-O, -R w/attach

DIR 922  
DIR 1.110300

Ms. Cheryl Soon  
Director  
Department of Transportation Services  
City and County of Honolulu  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813

Dear Ms. Soon:

Subject: Primary Corridor Transportation Project, Draft EIS

Thank you for the opportunity to review the Draft EIS for the Primary Corridor Transportation Project (PCTP). The project has many worthwhile features and we are in general support of it. However, we do have some concerns with the scope of the improvements, cost estimates, and implementation strategy, which need to be addressed and refined.

Our comments are as follows:

1. Full disclosure of the impacts to the non-transit users must be presented. The non-transit users should be appraised of the traffic congestion and delays they can expect with the pre-emption of traffic lanes and timing signals, especially since there is no plan to mitigate the adverse impacts.

Peak and non-peak traffic congestion information, in delay time and by roadway segments, should be included in the report, and because the implementation of the total system is critical to the system's performance, and it is highly doubtful that the total system can be implemented within a ten-year timeframe, information on the impacts during the interim period as well as upon completion of the system should be provided.

RONALD TSUZUKI  
HEAD PLANNING ENGINEER  
NOV 06 2000 11 11 AM  
HIGHWAYS DIVISION

Additionally,

- a. The evaluation measures include a breakdown of transit travel time by segments (i.e., between Downtown and Kapolei; Downtown and Waikiki; Downtown and UH-Manoa; and Downtown and Kalihi). A similar breakdown by roadway segments of auto travel time should be provided and discussed.
  - b. The discussion on federal highway funding states that less than 20 percent of the total annual highway funding would be used for the project. While this may be true on a statewide basis, information should be provided which sets the project more appropriately within the context of funds available for metropolitan Honolulu, and for use on capital improvement projects.
  - c. The report further states that no major capital projects would be deferred if either the TSM or BRT Alternatives were selected. This is not true.
2. The highway elements reflected in the alternatives are understated. Generally, only those projects programmed for implementation within the next three years were included in the analyses. Other highway projects identified in the current ORTP are underway and should also be reflected, including the Waimalu Viaduct widening, Nimiz Viaduct, the Freeway Management System, Ward Avenue Extension, and various ramp and interchange improvements. Additional projects have also been identified for the Ewa region.
  3. Scope of the highway improvements and cost estimates need to be refined.
    - a. It has been the HDOT's commitment to the FHWA that we would improve the Interstate to standard. Where construction on the Interstate is required to support the transit alternative, the project should include restoring the segment to standard, including preservation/maintenance and safety measures, as may be required. This needs to be factored into the project scope and cost estimates.
    - b. With the limitations on our fiscal and staffing resources, it would not be reasonable to assume that the highway elements of the project can be implemented within the ten-year time frame presented in the report. The list of projects requiring State and FHWA funds, and staff resources far exceed what is available. The commitment of State and Federal Highway funds needs to be resolved; policy decisions are yet to be made committing to the level of funding and timetable required for the project. Moreover, our engineers estimate the costs to be substantially higher than the \$200 million of FHWA and State funds assumed in the report.

- c. Various concerns on the deployment of the afternoon zipper lane remain outstanding. These include the adverse impacts to the inbound traffic, and the entire scope of work required for the zipper project itself (due to related improvements). The project does not adequately address the standard design and use of the shoulder lane, required structural support, modifications to existing interchanges for zipper lane access, and mitigation measures to address problems resulting from removal of the permanent median barriers (such as headlight glare).
4. Strategies for implementation need to be reconsidered. The planned higher density in the urban core, and pre-emption of traffic lanes and timing signals will intensify the congestion problems, creating possible gridlock. In concept, this will increase the diversion to transit. In reality, the diversion will not occur until the entire system is in place (otherwise, there would be no time savings); and the costs and time schedules appear to be overly optimistic. We cannot afford to be in gridlock for an extended "interim" period. The phasing of the project should be reconsidered to avoid taking of lanes until the final phases. Also, there would be those motorists unable to divert to a transit alternative, such as freight movers and parents with student drop-offs. Reasonable alternatives or provisions for these "captive" auto users should be developed.

We have included in this letter our specific recommendations on what believe would be a more viable implementation strategy.
5. The Honolulu International Airport (HNL) is a major trip attractor and employment site. Its patrons will not have access to the BRT since the nearest transit centers are at Pearl City and Iwilei. Accommodations to provide a link to the HNL should be investigated.

Recommendations:

The DEIS eliminates the highway only alternative and essentially pursues transit only alternatives. A more prudent approach may be to look at a combination of both. An enhanced transit system is definitely needed to address our congestion problems; but highway improvements are also required. A systematic, integrated implementation of both transit and highway improvements should be pursued.

  - A. HDOT is aggressively pursuing the Waimalu Viaduct widening project, which is scheduled for completion in 2004. This will provide some relief for outbound afternoon traffic. Discretionary funds have been earmarked for the project. Aside from adding an additional lane between the Kaonohi Overpass and Pearl City Off-ramp, this project will restore the Interstate to standards, and include preservation/maintenance, structural reinforcement and other safety measures, as may be required.

Ms. Cheryl Soon  
Page 4  
November 3, 2000

DIR 1.110300

The proposed PM zipper and other outbound transit improvements should be deferred until the effectiveness of the Waimalu project can be assessed. (The PM peak is also not the critical peak and resources should be first directed to the inbound morning congestion.)

B. For the inbound morning traffic, we need to further examine the travel time to the proposed transit centers. It would appear that the bottlenecks and congestion are concentrated at the outskirts of Downtown, with the back up beginning at Middle Street. If we can provide improved accesses to the transit centers, and incentives for the motorists to change modes at these centers, the number of vehicles entering Downtown could be reduced (e.g., reduced parking rates at the centers; employer sponsored bus passes, etc.). This can be done with or without the In-town BRT.

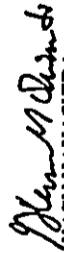
This strategy would mean continuing the bus service for the transit riders from the origin sites; and building up the transit centers and providing service from there for motorists who change modes enroute to their destinations. This should be done before implementing the In-town BRT because it may provide some congestion relief before pre-empting any lanes and causing a prolonged gridlock situation.

In the meantime, HDOT does intend to pursue the Nimitz Viaduct project, which would further relieve congestion during the implementation of the In-town BRT.

This type of strategy, an incremental implementation of the transit alternative, would not only allow us to spread out our financial and staffing resources, but more importantly, to re-evaluate the different phases of the total project and reassess the assumptions made.

We would be pleased to further discuss our comments and look forward to working with you on this project.

Sincerely,

  
KAZU HAYASHIDA  
Director of Transportation

JT:sy

c: FTA, FHWA, OMPO  
Hon. Benjamin J. Cayetano  
Hon. Daniel Inouye  
Hon. Neil Abernombie  
Hon. Cal Kawamoto  
Hon. Kenneth Hiraki  
bc: DEP-G, DEP-B, HWY, AIR, HAR  
HWY-P, AIR-P, HAR-EP

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE "BOB" MIYAMOTO  
DEPUTY DIRECTOR

TPD1100-05414R  
TPDS02-01844R

November 13, 2002

Mr. Brian Minaai, Director  
Department of Transportation  
State of Hawaii  
869 Punchbowl Street  
Honolulu, Hawaii 96813

Dear Mr. Minaai:

Subject: Primary Corridor Transportation Project

This is in response to the comments you made on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your November 3, 2000 letter regarding the MIS/DEIS. Part B responds to your May 7, 2002 letter regarding the SDEIS.

Part A - MIS/DEIS Comments

1. *The non-transit users should be apprised of the traffic congestion and delays they can expect with the pre-emption of traffic lanes and timing signals, especially since there is no plan to mitigate the adverse impacts.*

*Response:* Traffic signals will not be pre-empted by the BRT. At certain intersections, BRT vehicles approaching a green signal will activate a 10-second extension of the green indication for that cycle only. BRT vehicles stopped at a red signal will move concurrently with the through traffic in the same direction, unless the BRT vehicle must turn or change lanes, in which case it will be given a 4-second green signal in advance of the general purpose traffic lanes. All traffic signal extensions and advance indications will be timed in the field during actual operation to minimize adverse effects on general traffic flow.

2. *Peak and non-peak traffic congestion information, in delay time and by roadway segments, should be included in the report; and because the implementation of the total system is critical to the system's performance, and it is highly doubtful that the total system can be implemented within a ten-year timeframe, information on the impacts during the interim period as well as upon completion of the system should be provided.*

*Response:* Peak traffic congestion information is provided for the Year 2025 time frame per FTA and NEPA guidelines. By definition, non-peak traffic usually does not involve congestion. The project now has an implementation time frame of 15 years. As the project is implemented, the City will work with the State of Hawaii Department of Transportation to assess and mitigate traffic impacts related to interim conditions.

3. The evaluation measures include a breakdown of transit travel time by segments (i.e., between Downtown and Kapehi; Downtown and Waikiki; Downtown and UH-Manos; and Downtown and Kapehi). A similar breakdown by roadway segments of auto travel time should be provided and discussed.

**Response:** A table has been added to Chapter 1 in the FEIS to show auto travel times for the same origins and destinations as are shown for transit travel times in Chapter 4.

4. The discussion on federal highway funding states that less than 20 percent of the total annual highway funding would be used for the project. While this may be true on a statewide basis, information should be provided which sets the project more appropriately within the context of funds available for metropolitan Honolulu, and for use on capital improvement projects.

**Response:** The financial plans in the MIS/DEIS and the SDEIS propose \$160 million total in FHWA funding for the BRT alternative. This total has been reduced in the FEIS to \$139.6 million over 9 years, with no single year exceeding \$20 million. The total remaining FHWA funds available for other projects in the capital intensive project period is \$955.3 million, as compared to the \$701.1 million available in the MIS/DEIS financial plan. The amount of FHWA funds used for BRT would be less than 17 percent of the total annual highway funding for NHS, STP, CMAQ and Innovative Projects/Recreational Trails, High Priority Projects, and Minimum Guarantee categories are not included in the total or percentage calculation. These numbers and analysis are included in Chapter 6 of the FEIS. The amount of funds available for metropolitan Honolulu are within the purview of the cooperative planning conducted by the transportation departments of the State and counties, and in conjunction with the Oahu Metropolitan Planning Organization. The amount planned for and allocated has historically fluctuated in response to major project needs.

5. The report further states that no major capital projects would be deferred if either the TSM or BRT Alternatives were selected. This is not true.

**Response:** The financial analysis in Chapter 6 of the FEIS shows how the project could be funded without deferring any programmed major capital improvement project.

6. Generally, only those projects programmed for implementation within the next three years were included in the analyses. Other highway projects identified in the current ORTP are underway and should also be reflected, including the Waimalu Viaduct widening, Nimitz Viaduct, the Freeway Management System, Ward Avenue Extension, and various ramp and interchange improvements. Additional projects have also been identified for the Ewa region.

**Response:** The updated transportation analysis for the FEIS includes all transportation projects that were adopted April 6, 2001 by OHPO in the TOP 2025 Plan.

7. It has been the HDOT's commitment to the FHWA that we would improve the Interstate to Standard. Where construction on the Interstate is required to support the transit alternative, the project should include restoring the segment to standard, including preservation/maintenance and safety measures, as may be required. This needs to be factored into the project scope and cost estimates.

**Response:** A list of potential design exceptions has been compiled and submitted to HDOT, with coordination to continue through the final design phase. The proposed improvements, except for

two elements, meet the "reduced" guidelines referenced in the HOV Systems Manual (NCHRP Report 414, 1998). The two elements are 1) there are no shoulders proposed for the "Shoulder Lane", and 2) no structural capacity improvements for bridges are proposed since no additional loads will be created.

Improvements to bring the Interstate to full AASHTO/FHWA standards would require the replacement of all overcrossing structures, widening of the Pearl City and Airport viaducts, and reconstruction of the Waiawa, Halawa, Pearl Harbor, and Keahi Interchanges. Many of these improvements may not be feasible. Close coordination with HDOT/FHWA and analysis would continue to determine localities where specific design features should be brought to higher standards.

8. With the limitations on our fiscal and staffing resources, it would not be reasonable to assume that the highway elements of the project can be implemented within the ten-year time frame presented in the report. This list of projects requiring State and FHWA funds, and staff resources far exceed what is available. The commitment of State and Federal Highway funds needs to be resolved; policy decisions are yet to be made committing to the level of funding and timetable required for the project.

**Response:** The time frame for implementation is now 15 years. Both transit and highway elements of the project are included in the fiscally-constrained OHPO TOP 2025 list of projects. The timing of implementation of the project will be coordinated with the Hawaii Department of Transportation and the Federal Highways Administration through the Oahu Metropolitan Planning Organization.

9. Moreover, our engineers estimate the costs to be substantially higher than the \$200 million of FHWA and State funds assumed in the report.

**Response:** Subsequent meetings with SDOT engineers established that the differences in cost estimates would only result if the BRT project were required to meet full Interstate standards rather than the NCHRP standards that are proposed.

10. Various concerns on the deployment of the afternoon zipper lane remain outstanding. These include the adverse impacts to the inbound traffic, and the entire scope of work required for the zipper project itself (due to related improvements).

**Response:** Included in the TOP 2025 fiscally-constrained projects is the widening of eastbound H-1 Freeway by one lane between Waiawa and Halawa interchanges (project P-7). This planned improvement will provide six inbound lanes between Waiawa and Halawa interchanges. The P.M. zipper lane will occupy two of these lanes. The remaining four lanes will allow inbound H-1 to operate at LOS E with the P.M. zipper lane deployed.

The BRT project would coordinate closely with the Hawaii Department of Transportation with regard to transitions and location of the zipper lane vehicle garage.

11. The project does not adequately address the substandard design and use of the shoulder lane, required structural support, modifications to existing interchanges for zipper lane access, and mitigation measures to address problems resulting from removal of the permanent median barriers (such as headlight glare).

15. The DEIS eliminates the highway only alternative and essentially pursues transit only alternatives. A more prudent approach may be to look at a combination of both. An enhanced transit system is definitely needed to address our congestion problems; but highway improvements are also required. A systematic, integrated implementation of both transit and highway improvements should be pursued.

**Response:** OMIPO's TOP 2025 Plan is the multi-modal and inter-modal transportation plan for Oahu of which the PCTP is the transit component of the Primary Corridor (Kapiolani to Downtown). Therefore, the highway component of the Primary Corridor is addressed in the TOP 2025 Plan. Examples of highway projects in the Primary Corridor listed in the TOP 2025 Plan are: the H-1 WB Widening Waimalu Viaduct to Pearl City Off-ramp, H-1 EB Widening Waiawa to Halawa and H-1 WB Widening Vineyard to Middle Street.

16. HDOT is aggressively pursuing the Waimalu Viaduct widening project, scheduled for completion in 2004. This will provide some relief for outbound afternoon traffic. Discretionary funds have been earmarked for the project. Aside from adding an additional lane between the Koonohi Overpass and Pearl City Off-ramp, this project will restore the Interstate to standards, and include preservation/maintenance, structural reinforcement and other safety measures, as may be required. The proposed P.M. zipper and other outbound transit improvements should be deferred until the effectiveness of the Waimalu project can be assessed.

**Response:** The Waimalu Viaduct widening is assumed to be part of the future highway network and its effect is included in the analyses. The P.M. zipper will work with the Waimalu Viaduct widening to provide a faster and less congested lane for transit and HOVs. It also will allow expedited BRT access via ramps to and from the zipper lane during peak periods.

17. For the inbound morning traffic, we need to further examine the travel time to the proposed transit centers. It would appear that the bottlenecks and congestions are concentrated at the outskirts of Downtown, with the back up beginning at Middle Street. If we can provide improved accesses to the transit centers, and incentives for the motorists to change modes at these centers, the number of vehicles entering Downtown could be reduced. This can be done with or without the In-Town BRT.

**Response:** DTS agrees that improving the access to transit centers and locating the transit centers at strategic locations would provide incentives for people to switch modes from private automobiles to transit. The Refined LPA includes a Regional BRT component that extends from Kapiolani to Middle Street and includes extending the existing A.M. zipper lane and adding a P.M. zipper lane. In addition, priority treatments for BRT are proposed for ramps at Kapiolani, North-South Road, Luapele Drive near Aloha Stadium and Middle Street. These priority treatments will be constructed to facilitate movements from H-1 to the transit centers at these locations. There are also park-and-ride facilities planned to be located at Kapiolani, North-South Road, Aloha Stadium and Middle Street. DTS believes the Regional BRT alone would not be effective in getting people out of their cars. The combination of Regional and In-Town BRT is needed. The added attractiveness is demonstrated by the additional riders shown with the Refined LPA compared to the TSM Alternative. The TSM Alternative has many of the Regional BRT components but lacks the In-Town components.

18. This strategy would mean continuing the bus service for the transit riders from the origin sites; and building up the transit centers and providing service from there for motorists who change modes

**Response:** See response to comment #7 regarding standard design. Shoulder lanes are no longer utilized, since the project assumes the implementation of the H-1 eastbound widening between Waiawa and Halawa interchanges.

With regard to structural support on the Pearl City and Waimalu viaducts, the weight of the proposed movable barrier would be offset by removing the existing center barrier. There are no structural concerns as a result of adding zip movable barriers on the Airport viaduct.

The modifications to existing interchanges for zipper lane access are defined in the preliminary engineering plans.

Research is being conducted to find movable barriers with provisions for headlight glare screen. Note, however, that AASHTO Guidelines do not indicate that anti-glare treatment in this area is required. The guidelines state that, "Where there is no fixed-source lighting, headlight glare across medians or outer separations can be a nuisance, particularly where the highway has relatively sharp curves. Under these conditions, some form of anti-glare treatment should be considered as part of the median barrier installation, provided it does not act as a snow fence and create drifting problems." (A Policy on Geometric Design of Highways and Streets, AASHTO, 1994, pg.369). The location of concern has fixed-source lighting and does not have relatively sharp curves.

12. The planned higher density in the urban core, and pre-emption of traffic lanes and timing signals will intensify the congestion problems, creating possible gridlock. In concept, this will increase the diversion to transit. In reality, the diversion will not occur until the entire system is in place (otherwise, there would be no time savings); and the costs and time schedules appear to be overly optimistic. We cannot afford to be in gridlock for an extended "interim" period. The phasing of the project should be reconsidered to avoid taking of lanes until the final phases.

**Response:** Exclusive lanes will be implemented as transit and traffic conditions warrant them. The initial Waikiki branch of the BRT will travel in mixed-flow and semi-exclusive lanes. Early phases of the Dillingham segment and the UH-Manoa branch could be implemented without exclusive lanes, moving to exclusive lanes when traffic conditions indicate that they are needed to provide greater throughput for transit vehicles.

13. Also, there would be those motorists unable to divert to a transit alternative, such as freight movers and parents with student drop-offs. Reasonable alternatives or provisions for these "captive" auto users should be developed.

**Response:** There is no intent to force "captive" auto users to divert to transit. There will still be an extensive network of arterial and local streets, and state highways and freeways that will continue to serve auto travel.

14. The Honolulu International Airport (HNL) is a major trip attractor and employment site. Its patrons will not have access to the BRT since the nearest transit centers are at Pearl City and Inaia. Accommodations to provide a link to the HNL should be investigated.

**Response:** Regional BRT passengers will be able to transfer to Routes 19 and 20 at the Middle Street Transit Center. These routes serve the Airport directly.

enroute to their destinations. This should be done before implementing the In-Town BRT because it may provide some congestion relief before pre-empting any lanes and causing a prolonged gridlock situation.

**Response:** The In-Town BRT is a vital part of encouraging people to switch from private automobiles to transit because it will provide substantially improved transportation service within the urban core.

19. In the meantime, HDOT does intend to pursue the Nimitz Viaduct project, which would further relieve congestion during the implementation of the In-Town BRT.

**Response:** The improvements to Nimitz Highway which were included in TOP 2025 adopted by OMPO on April 6, 2001 are included in the future transportation impact analysis for 2025.

20. This type of strategy, an incremental implementation of the transit alternative, would not only allow us to spread out our financial and staffing resources, but more importantly, to re-evaluate the different phases of the total project and reassess the assumptions made.

**Response:** The OMPO TOP 2025 includes the transit and highway projects approved for Oahu and the proposed funding sources.

Part B - SDEIS Comments

21. As stated in our letters dated November 3, 2000 and April 15, 2002, before the City decides to implement actions which may adversely impact existing motorists, your EIS needs to fully disclose, and the public needs to be adequately informed of, traffic impacts which immediately will occur when measures are taken to give the In-Town BRT priority over other traffic. To date, sufficient information has not been provided in the City's EIS documents. We are especially concerned about traffic impacts to the State highway system when the In-Town BRT is implemented on King Street and Dillingham, Keolu, and Ala Moana Boulevards. As further indicated in our letter dated April 15, 2002, details of all proposed improvements within the State highway right-of-way (ROW) must be submitted for our review and approval.

**Response:** The FEIS documents projected traffic impacts of the In-Town and Regional BRT in Section 4.4.2.

22. Our Harbors Division strongly objects to any loss of prime harbor property makai of Ala Moana Boulevard because of potential constraints to container yard and cruise ship operations. As indicated in our letters dated October 24, 2001 and April 15, 2002, we request that the Final EIS fully address their concerns.

**Response:** The Refined LPA no longer requires any State DOT property makai of Ala Moana Boulevard.

23. Although the proposed Pier 2 Cruise Ship Terminal has been postponed, please consult the U.S. Coast Guard concerning design requirements, access limitations, and parking restrictions necessary to maintain security between the proposed Terminal and Iliolo Street.

**Response:** The HCDA's most current plans reflect the Iliolo St. extension along Forrest Avenue. As a result, the Refined LPA now shows the BRT operating on Forrest Avenue and not Channel Street. Therefore, no conflicts with the Pier 2 cruise ship terminal are anticipated, and no Coast Guard consultation is deemed necessary.

24. The Final EIS needs to update previous information about where and when the City proposes to convert existing traffic lanes to contra-flow and/or BRT use. There needs to be full, clear public disclosure of where roadway capacity would be lost or reduced and how this capacity displacement will be accommodated through the City's proposed mitigation strategies. Table 2.2-4 should be expanded to include a comprehensive summary of where and when EIS proposals for contra-flow would affect existing laneage on State highways, and when and where EIS proposals would affect existing contra-flow laneage on Keolu and Keolu Boulevard.

**Response:** The extension of the A.M. contraflow lane on the H-1 freeway will extend from the existing crossover no. 4, along the Airport Viaduct, to the intersection of Nimitz Highway and Sand Island Parkway. The number of outbound lanes will be reduced by one while the A.M. contraflow lane is deployed. The P.M. contraflow lane on the H-1 freeway will extend from the Pearl Harbor Interchange to the Waiawa Interchange. The number of inbound lanes will be reduced by two while the P.M. contraflow lane is deployed. Utilizing the existing shoulder lane from the Helewa Interchange to the Waiawa Interchange during the P.M. Peak hours will result in a net reduction of one lane for this area.

25. At the time existing traffic lanes are initially converted to exclusive use by the proposed In-Town BRT and existing traffic signals are modified to give priority to the In-Town BRT:

- Which intersections and roadways will have reduced levels of service?
- How will traffic signal coordination and progression be affected and what are the potential impacts to ITS and traffic flow on the surrounding highway system?
- What will be the cumulative impacts on the duration and severity of traffic congestion at screen lines?
- What will be the cumulative impacts in terms of vehicle travel time delay along the major arterials where BRT operations will reduce roadway capacity?
- What share of trips will be made by bus?
- How many drivers will be worse off and how much more travel delay will they experience?
- How many bus riders will be better off and how much less travel delay will they experience?

**Response:** Exclusive lanes will be implemented incrementally as traffic and transit conditions warrant them. Therefore, there is no time frame for the implementation of all exclusive lanes at once. The FEIS provides a snapshot of Year 2025 conditions, at which time all exclusive lanes are assumed to be implemented. Similarly, partial implementation of exclusive lanes along BRT corridors are also a possibility, based on traffic and transit conditions.

26. The Final EIS needs to evaluate the noise impacts, between the Pearl Harbor Interchange and the Waiawa Interchange, resulting from increased peak afternoon traffic volumes when the proposed westbound zipper lane is deployed on Interstate H-1.



**Response:** Whether the Refined BRT Alternative or No-Build Alternative is implemented, afternoon peak-hour noise levels along the H-1 corridor will increase by 1 to 2 dBA in 2025. This increase is a result of an overall increase in future traffic volumes and cannot be attributed to the zipper lane, which accounts for only 4% of the projected total afternoon westbound peak-hour traffic on the H-1 Freeway. Vehicle speeds will play little or no role in the increased noise levels.

Because the No-Build and Refined LPA predicted H-1 noise increase is between 1 and 3 dBA, the change in traffic noise levels would range from imperceptible to barely perceptible for most people.

**27. The Final EIS needs to compare the benefits, costs, and drawbacks of full compliance with Interstate Standards for each proposed Design Exception. Full compliance with Interstate Standards is normally a reasonable alternative to Design Exceptions. Unless adequate justification is provided, we cannot support and FHWA may not grant even a temporary Design Exception for substandard at-grade highway shoulders.**

**Response:** Chapter 2, Section 2.2.7 of the FEIS describes the alternative standards proposed for the BRT improvements. These alternative standards have been used throughout the U.S. on similar projects in urban corridors with restricted right-of-way. A comparison with full interstate standards will be contained in the design exception report prepared during the final design phase of the project.

**28. The Final EIS needs to describe likely temporary construction-related impacts to the State highway system. Off-peak construction may not be sufficient to mitigate impacts. Other congestion mitigation strategies must be provided for construction-related impacts.**

**Response:** As with all construction projects, there will be impacts that would need to be mitigated. The BRT project will use best practice techniques and work with communities affected to mitigate construction-related impacts.

**29. The Final EIS needs to include estimates of daily boardings and alightings at the Aloha Stadium Transit Center by bus-riders using the proposed Luapele Drive ramp at the time when the City proposes that this ramp be completed. The Final EIS should include similar estimates for the proposed Kunia and Kapolei ramps at the time when the City proposes that these ramps be completed. And Table 4.1-7 should include similar estimates for all three ramps in 2025.**

**Response:** The Luapele Drive ramp will be built as part of the Refined LPA as an exclusive one-lane reversible ramp. Projected usage is 22 buses per hour in 2025. The project no longer calls for exclusive BRT ramps on H-1 at Kunia (North-South Road) or Kapolei (Palalal Road). Instead BRT buses will use the HDOT planned interchanges at these locations to access the H-1 express lanes.

**30. We would like to clarify statements about HDOT priorities in our letters dated November 3, 2000 and October 24, 2001. Unlike the City, we have a statewide system and need to meet statewide demands. Our highest priority is to maintain existing State highways and keep them safe. Our next priority is to make incremental improvements to benefit existing highway users. Unfortunately, our statewide needs far exceed available State and FHWA funds.**

**Response:** The term "competition" does not accurately depict the future programming opportunity for federal highway funds for the BRT. There has been a significant decision by the Oahu Metropolitan Planning Organization (OMPO) to include funding for the BRT in its long-range

transportation plan. Federal regulation (23 CFR, Part 450, Planning Assistance and Standards) requires that any project that requests the use of federal funds must be consistent with the regional transportation plan. In April 2001, the OMPO Policy Committee voted to approve the long-range regional plan (Transportation for Oahu Plan, TOP 2025) that includes the use of federal highway funds for BRT. The amount of federal highway funds for BRT included in the regional plan is comparable to that of the FEIS. Therefore, the FEIS financial plan is consistent with the approved regional transportation plan.

**31. The Oahu Metropolitan Planning Organization Policy Committee will approve the amount of Oahu FHWA and FTA funds available for the BRT or other projects. Over the past decade, the City has received an average of about \$10 million/year of some kind of FHWA funds for a variety of projects including road resurfacing, road widening, new roads, traffic signals, traffic surveillance cameras, bikeways, bridges, street trees, underground utilities, and acquisition of shoreline property. In the future, the BRT will compete with other eligible, desirable projects for use of FHWA funds.**

**Response:** See response to comment #30.

**32. Previous and current HDOT comments must be addressed to our satisfaction.**

**Response:** HDOT comments have been addressed.

**33. Much more information is available to describe and evaluate the environmental impacts of the proposed Mele Street ramp and the proposed In-Town BRT than the proposed Regional BRT. Further analysis and a future Supplemental DEIS will be required for several key components of the Regional BRT.**

**Response:** The analysis level is commensurate with the impacts.

**34. The Final EIS needs a technical appendix to explain the assumptions and methodology used to quantify:**

- travel demand
- peak spreading / duration of traffic congestion
- screening capacity and level of service
- reductions in screening throughout due to downstream congestion
- transit mode share
- vehicle miles of travel
- vehicle hours of delay
- screening "person-carrying capacity"
- transit boardings per linked trip
- measures for traffic signal prioritization

The technical appendix also needs to document that traffic forecasting models used for the EIS reasonably reflect the duration and severity of traffic congestion, transit mode share, vehicle miles of travel, and vehicle hours of delay under existing conditions.

Mr. Brian Minaal  
Page 10  
November 13, 2002

**Response:** To address HDOT's concerns specifically, a separate technical traffic report that addresses the Refined LPA will be prepared and provided to HDOT in early 2003.

35. *The City should coordinate the BRT project with current HDOT projects to extend the existing morning H-1 zipper lane and provide peak morning eastbound contra-flow on Nimitz Highway.*

**Response:** The extension of the existing morning H-1 zipper lane on the airport viaduct is part of the BRT project and would work well with the contra-flow project proposed for Nimitz Highway.

We will send you 10 copies of the Final Environmental Impact Statement under separate cover. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director



HAWAIIAN  
TRANSPORTATION  
AUTHORITY



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Ref. Nos.: PL TRANS 7.14  
GF COUN 5.17

April 8, 2002

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Dear Ms. Soon:

Subject: Primary Corridor Transportation Project  
Supplemental Draft Environmental Impact Statement

Thank you for the opportunity to review the Primary Corridor Transportation Project Supplemental Draft Environmental Impact Statement (SDEIS).

1. At the appropriate time, plan amendments must be processed to the extent that this project affects the Kakaako Mauka and Makai Plans. Please contact us to coordinate this.
2. On page 5-27, paragraph 2, Channel Street is not being reconstructed. The writer may be confusing Channel Street with Forrest Avenue which HCDA is planning to temporarily realign as a private roadway easement within the next year, and which plans should be incorporated into yours to avoid conflict.
3. We also point out that there is no existing public roadway connection between Ilalo Street and Channel Street and that there appears to be an inconsistency between your plans in the SDEIS and the DP public facilities map, which was sent for comment on March 20, 2002. The latter indicates an alignment over Buford Avenue (labeled "Papu Street") which does not match the alignment in Appendix B of the SDEIS.
4. For your information, the alignment map on page 2-20 does not include several HCDA and HCDCH projects.

8.17.7.6

**CITY AND COUNTY OF HONOLULU**

DEPARTMENT OF TRANSPORTATION SERVICES

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MAY - 3 2002

Ms. Cheryl D. Soon, Director  
Page Two  
April 8, 2002

JEREMY HARRIS  
DIRECTOR



April 26, 2002

CHERYL D. SOON  
DIRECTOR

GEORGE "KENE" KIRIHIMOTO  
DIRECTOR  
TP4/02-01387R

- 5. Appendix B, drawing 1-9, conflicts with HCDA's planned Punchbowl Extension of Ilalo Street. This proposed alignment also conflicts with DOT's active use of the area between Ilalo and Channel Streets as mentioned in Item #4 of the DOT letter dated October 24, 2001, Appendix D.
- 6. In Appendix B, drawing 1-10, Forrest Avenue is mistakenly labeled as a City road. Forrest Avenue is a State (HCDA) road.
- 7. In Appendix B, drawing 1-11, the plan shown for Ilalo Street is outdated and should be corrected.

Ms. Jan S. Yokota  
Executive Director  
Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawaii 96813

If you have any questions, please do not hesitate to contact Teney Takahashi at 587-8162.

Sincerely,

Jan S. Yokota  
Executive Director

JSY:TKT:gst  
cc: Genevieve Salmonson (OEQC)

Thank you for transmitting your comments (dated April 8, 2002) for the Supplemental Draft Environmental Impact Statement, Primary Corridor Transportation Project. The following is our response in the same order as presented in your letter.

- 1. Your agency will be contacted to coordinate the Bus Rapid Transit (BRT) alignment and improvements with your plans for Kakaako Mauka and Makai.
- 2. The assumption that Channel Street will be constructed to connect with Ilalo Street was based on HCDA drawings dated July 8, 1999. We have since obtained updated HCDA drawings, and the BRT alignment has been revised accordingly to replace Channel Street with Forrest Avenue.
- 3. The Public Facilities Map will be changed in accordance with your comment regarding Buford Avenue (labeled "Papu Street").
- 4. The Kakaako Makai Branch map (Figure 2.2-6) on page 2-20 of the SDEIS will be revised to include the HCDA and HCDCCH projects. These projects were provided by Mr. Teney Takahashi.
- 5. Similar to the response for Item No. 2 above, the HCDA drawings dated July 8, 1999 were used as a reference in designing the BRT alignment through this area. The purpose of this preliminary alignment in the SDEIS is to disclose environmental impacts of the eventual BRT system on this area. The BRT alignment has been revised to show Ilalo Street extension to Forrest Avenue (and not Channel Street).



Ms. Jan S. Yokota  
Page 2  
April 26, 2002

DEPARTMENT OF TRANSPORTATION SERVICES  
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MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE 'KEOKI' MYAMOTO  
DEPUTY DIRECTOR

6. Forrest Avenue will be correctly relabeled to indicate that it is owned by the State of Hawaii on Drawing No. I-10 in Appendix B.

7. Drawing No. I-11 in Appendix B was based on HCDA drawings dated July 8, 1999 as a reference. As a result of your letter, updated HCDA drawings for Ilalo Street have been obtained and the drawings revised accordingly.

November 13, 2002

Sincerely,

*Cheryl D. Soon*  
CHERYL D. SOON  
Director

dc (N. Kawachiika)

Ms. Jan S. Yokota  
Executive Director  
State of Hawaii  
Hawaii Community Development Authority  
677 Ala Moana Boulevard  
Suite 1001  
Honolulu, Hawaii 96813

Dear Ms. Yokota:

Subject: Primary Corridor Transportation Project

This is in response to your April 8, 2002 letter regarding the Supplemental Draft Environmental Impact Statement (SDEIS). Your letter provided us with seven comments, which were addressed in our letter dated April 26, 2002.

We will send you a copy of the Final Environmental Impact Statement under separate cover. We appreciate your interest in the project.

Sincerely,

*Cheryl D. Soon*  
CHERYL D. SOON  
Director

BENJAMIN J. CAYETANO  
CHAIRMAN



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OLIVERA BALLEGAARD  
DIRECTOR

Cheryl Soon  
November 6, 2000  
Page 2

November 6, 2000

Cheryl Soon  
Department of Transportation Services  
711 Kapiolani Blvd., #1200  
Honolulu, Hawaii 96813

Attn: Kenneth Hamsyasu

Dear Ms. Soon:

Subject: Draft Environmental Impact Statement (EIS) for Primary Corridor.  
Transportation Project

We have the following comments to offer:

1. This office received complaints regarding the method of public input during the community presentations. Comments only were recorded, but there was no forum for open dialog in which attendees could interact with one another and with the presenters. Will you hold future presentations which will include true open dialog?
2. Responses to comments: Some responses to comments made on the EISPN were too brief. While formulating responses to comments made on the Draft EIS, please bear in mind the requirements of §11-200-22(c), which follows:

"The response to comments shall include: (1) Point-by-point discussion of the validity, significance, and relevance of comments; and (2) Discussion as to how each comment was evaluated and considered in planning the proposed action.

"The response shall endeavor to resolve conflicts, inconsistencies, or concerns. Response letters reproduced in the text of the final EIS shall indicate verbatim changes that have been made to the text of the draft EIS. The response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections, etc.). In particular, the issues raised when the applicant's or proposing agency's position is at variance with recommendations and objections raised in the comments shall be addressed in detail, giving reasons why

3. Cultural impacts assessment: Act 50 was passed by the Legislature in April of 2000. This mandates an assessment of impacts to local cultural practices by the proposed project. In the final EIS include such an assessment. For assistance in the preparation refer to our Guidelines for Assessing Cultural Impacts. Contact our office for a paper copy or go to our homepage at <http://www.state.hawaii.gov/health/legis/index.html>. You will also find the text of Act 50 linked to this section of our homepage.
4. Vibration levels: Noise and vibration are listed together in the title of chapter 5. It appears there will be impacts from construction vibration, yet there is only a brief discussion of impacts and no mitigation measures listed. If operational vibrational impacts are not an issue, explain why, and also include your explanation in the executive summary.
5. Compatibility with land use policies: Provide a synopsis of this in the executive summary.
6. Legal challenge period: The legal challenge period for a final EIS is 60 days, not 30 as stated in chapter 1.4, §7, Acceptance of the Final EIS/Record of Decision.
7. Block J: In chapter 2, Alternatives Considered, Block J is listed as a park & ride site. Has this location been committed to this project?
8. Candidate transit centers: Section 5.7 in the executive summary, Issues for future consideration, states that "supplemental environmental documentation" would be prepared for selected transit center sites under the TSM or BRT alternatives. Sites not fully described in this EIS will need to have impacts and mitigation measures disclosed in additional environmental assessments or environmental impact statements.
9. Candidate technologies: Chapter 2.2.3, §5, Transit technology for the In-town BRT system does not discuss impacts and related mitigation measures for the candidate technologies. These must be disclosed in a supplemental environmental disclosure document.
10. Unresolved issues:
  - a. In addition to the synopsis given in the executive summary, a full discussion of unresolved issues is required, along with an explanation of how these issues will be resolved or overriding reasons for proceeding with the project.
  - b. The results of the water quality survey for the EPA, the results of the hazard

Cheryl Soon  
November 6, 2000  
Page 3

JENJAMIN J. CAVETAKO  
DIRECTOR



APR 29 2002

GENEVIEVE SALMONSON  
DIRECTOR

STATE OF HAWAII  
OFFICE OF ENVIRONMENTAL QUALITY CONTROL  
230 SOUTH BERTLAND STREET  
HONOLULU, HAWAII 96813  
PHONE: 808-551-1111  
FACSIMILE: 808-551-1118

April 29, 2002

Cheryl Soon  
Department of Transportation Services  
650 South King St., 3rd floor  
Honolulu, Hawaii 96813

Attn: Faith Miyamoto  
Dear Ms. Soon:

Subject: Supplemental Draft Environmental Impact Statement (EIS) for Primary Corridor Transportation Project

We have the following comments to offer:

materials survey and required mitigation measures for each should be included in the final EIS or discussed in the section on unresolved issues.

11. Visual resources:

It is difficult to tell from the drawing in figure 2.2-4 what the final appearance of a typical transit stop will look like. For each of the sensitive areas, show the impact by superimposing a photo or rendering of the proposed facility onto photographs of the affected areas taken from public vantage points, including the area fronting the Duke Kahanamoku statue in Waikiki. Similarly, include a superimposed rendering of a sound barrier wall in one of the potentially affected neighborhoods.

12. Section 4(f) Parkland evaluation: In the final EIS please explain why impacts to Ala Moana Park are not subject to a 4(f) evaluation. Expand your discussion of potential impacts through the loss of adjacent traffic lanes and on-street parking. Are any mitigation measures planned to offset these impacts?

13. Permits: A listing of the status of each permit or approval is required by HAR §§11-200-17 (b). Please add this to your permits chart in chapter 7.5 in the final EIS. If you have not yet applied for some of the permits, then list the expected date of application.

If you have any questions call Nancy Heinrich at 586-4185.

Sincerely,

GENEVIEVE SALMONSON  
Director

c: David Atkin, Parsons Brinckerhoff

1. Public meetings: This office received complaints regarding the method of public input during the community presentations. Comments only were recorded, but there was no forum for open dialog in which attendees could interact with one another and with the presenters. In the final EIS, give a description of the methods used to solicit and record comments if the above is incorrect. Also, following Table A-4, include a brief summary of the issues raised.
2. Compatibility with land use policies: In addition to consistency with land use plans, list those public policies with which the Primary Corridor is in conflict, and how the conflict or inconsistency will be handled.
3. Definitions: acronyms: Section 5.10.4 lists "Kupuna Iwi." Please add this term to the glossary. In Table S.4-1 define G.O., UZA and FGM, or add them to the acronyms list.
4. Unresolved issues:  
These need to be listed in a separate section of the final EIS, along with a discussion of how they will be resolved, or an explanation for proceeding with the project if they are not resolved. Also include a synopsis of this discussion in the summary section. If mitigation measures for an issue are not yet ready to be selected, you may list all possible mitigation measures and indicate that measures will be chosen from that list at the appropriate time.

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE "KEO" IMAI  
DEPUTY DIRECTOR

TPD11/00-05378R  
TPD4/02-01691R

November 13, 2002

Ms. Genevieve Salmonson, Director  
Office of Environmental Quality Control  
State of Hawaii  
236 South Beretania Street  
Honolulu, Hawaii 96813

Dear Ms. Salmonson:

Subject: Primary Corridor Transportation Project

This is in response to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to the comments in your November 6, 2000 letter regarding the MIS/DEIS. Part B responds to the comments in your April 29, 2002 letter regarding the SDEIS.

Part A - MIS/DEIS

*Genevieve Salmonson*  
GENEVIÈVE SALMONSON  
Director

c: Robert Bramen, Parsons Brinckerhoff

The following issues in the SDEIS appear to be unresolved. They either need to be delineated in the final EIS along with their mitigation measures or listed as unresolved issues. If the latter, indicate how they will be resolved or, if that is impossible to know at this time, indicate that they will undergo a public review in a future EA or EIS.

- a. *Visual Impacts (section 5.4.2)*: What are the visual impacts in the Special Districts and how will they be mitigated?
- b. *Ground water impacts (section 5.8.2)*: Indicate the outcome of your coordination with the EPA and mitigation measures planned.
- c. *Loss of parking and loading zones (sections 4.3.4, 4.4.4, 5.11.1)*: What mitigation measures are planned to mitigate the loss of street parking on, among other locations, Ala Moana Boulevard along Ala Moana Park, and the loss of loading zones?

If you have any questions call Nancy Heinrich at 586-4185.

Sincerely,

*Genevieve Salmonson*  
GENEVIÈVE SALMONSON  
Director

1. This office received complaints regarding the method of public input during the community presentations. Comments only were recorded, but there was no forum for open dialog in which attendees could interact with one another and with the presenters. Will you hold future presentations which will include true open dialogs?

Response: We take exception to this statement. A considerable amount of time, effort, and expense was put to public input. In fact, the project refinements discussed in the SDEIS are entirely a result of the input and dialogue coming out of these meetings.

Since the PCTP and Trans2K began in 1998, we have had hundreds of meetings. The amount and type of dialogue varied depending on the project phase. We have used every conceivable type of communication format at these meetings from brainstorming, questions/answers, powerpoint presentations, display boards, interactive website, radio, television, and newspapers. Public representatives have traveled with official City delegations to places such as Portland, Oregon; Vancouver British Columbia; San Jose, California; Curitiba, Brazil; Miami Florida; and Los Angeles, California.

Only formal public hearings, such as the DEIS scoping meeting, took the form of a presentation followed by the recording of comments. Even at these public hearings, there typically involved an "open-house" format before and after the taking of oral testimony so that participants could have open dialogue with the DTS, their consultants, and other meeting attendees.

Please see the FEIS Appendix A, which discusses the comments and coordination. The project's public involvement continues to be a major focus.

2. Some responses to comments made on the EISPN were too brief. While formulating responses to comments made on the draft EIS, please bear in mind the requirements of § 11-200-22(c): "The response to comments shall include: (1) Point-by-point discussion of the validity, significance, and relevance of comments; and (2) Discussion as to how each comment was evaluated and considered in planning the proposed action." The response shall endeavor to resolve conflicts, inconsistencies, or concerns. Response letters reproduced in the text of the final EIS shall indicate verbatim changes that have been made to the text of the draft EIS. The response shall describe the disposition of significant environmental issues raised. In particular, the issues raised when the applicant's or proposing agency's position is at variance with recommendations and objections raised in the comments shall be addressed in detail, giving reasons why specific comments and suggestions were not accepted, and factors of overriding importance warranting an override of the suggestions.\*

Response: DTS has satisfied the requirements of 11-200-22C in its responses to the EISPN comments. The comments received on the MISDEIS and SDEIS have also been answered in the FEIS.

3. Act 50 was passed by the Legislature in April of 2000. This mandates an assessment of impacts to local cultural practices by the proposed project. In the final EIS include such an assessment.

Response: The results of the Act 50 assessment were presented in the SDEIS and FEIS. Before the Act 50 Assessment was initiated, project team members met with OEOC and OHA personnel to discuss the scope.

4. Noise and vibration are listed together in the title of chapter 5. It appears there will be impacts from construction vibration, yet there is only a brief discussion of impacts and no mitigation measures listed. If operation vibrational impacts are not an issue, explain why, and also include your explanation in the executive summary.

Response: Noise and vibration levels during construction would be subject to the requirements of the State Department of Health. The BRT is a rubber-tired vehicle. Vibration from rubber-tired vehicles, such as buses and trucks, is not perceptible, even in locations close to major roads. Section 5.6.1.2 of the FEIS discusses ground vibration from BRT vehicles and FTA vibration criteria. The Executive Summary includes the explanation.

5. Compatibility with land use policies - Provide a synopsis of this in the executive summary.

Response: The requested synopsis is provided in the FEIS Executive Summary.

6. The legal challenge period for a final EIS is 60 days, not 30 as stated in chapter 1.4, #7, Acceptance of the Final EIS/Record of Decision.

Response: The legal challenge period described in the FEIS has been changed from 30 days to 60 days.

7. In chapter 2, Alternatives Considered, Block J is listed as a park & ride site. Has this location been committed to this project?

Response: Block J is no longer being considered as a potential park-and-ride site.

8. Chapter 2.2.3, #5, Transit technology for the In-town BRT System does not discuss impacts and related mitigation measures for the candidate technologies. These must be disclosed in a supplemental environmental disclosure document.

Response: The issue of technology selection is discussed in Chapter 2 of the FEIS, which describes a screening process of candidate technologies that was conducted. This screening resulted in two candidate technologies: Embedded Plate Technology and Hybrid-Electric Propulsion System. Particular attention is paid to differences in environmental performance between these technologies. Where appropriate, differences in impacts that result from variation in technology are specifically identified in the FEIS, Chapter 5.

9. In addition to the synopsis given in the executive summary, a full discussion of unresolved issues is required, along with an explanation of how these issues will be resolved or overriding reasons for proceeding with the project.

Response: The requested information will be contained in the FEIS.

10. The results of the water quality survey for the EPA, the results of the hazard materials survey and required mitigation measures for each should be included in the final EIS or discussed in the section on unresolved issues.

Response: As per clarification received July 13, 2001 via personal communication with OEOC staff, this comment refers to the sole source aquifer ground water impact assessment under Section 1424(e) of the Safe Drinking Water Act, as cited on page 5-59 of the MISDEIS.

Coordination with the EPA on the SOBA ground water impact assessment has been completed and the results included in Section 5.8.2 of the FEIS.

Sections 3.9 and 5.12.9 include the results of the hazardous materials survey conducted and potential mitigation measures.

11. It is difficult to tell from the drawing in Figure 2.2-4 what the final appearance of a typical transit stop will look like. For each of the sensitive areas, show the impact by superimposing a photo or rendering of the proposed facility onto photographs of the affected areas taken from public vantage points, including the area fronting the Duke Kahanamoku statue in Waikiki.

Response: Some conceptual design work was done to give various community working groups a sense of what a transit stop could look like. Some of these concepts are included in Section 5.4 - Visual and Aesthetics so readers have an idea of how a BRT stop can be designed to enhance urban form. Each location is unique, however, and conceptual designs were not developed for every stop. The BRT stop on Kalakaua Avenue near Uluhi Street will not have a canopy so that the Duke Kahanamoku statue will not be affected. The traction power substation originally shown in the vicinity of the statue has also been relocated. (See Appendix B Preliminary Engineering Drawings.)

12. Similarly, include a superimposed rendering of a sound barrier wall in one of the potential affected neighborhoods.

Response: To be effective, a sound wall requires height and mass be determined by an acoustical engineer. One example of a sound wall is the CMU walls found along the Salt Lake Boulevard Corridor near Alpha Stadium (split face and creeping fig). Appropriately landscaped, it



can be a positive element along the corridor. The FEIS Section 6.4 - Visual and Aesthetics contains a conceptual drawing of a sound wall to show how it can be designed without being visually intrusive.

13. *In the final EIS please explain why impacts to Ala Moana Park are not subject to a 4(f) evaluation. Expand your discussion of potential impacts through the loss of adjacent traffic lanes and on-street parking. Are any mitigation measures planned to offset these impacts?*

**Response:** A Section 4(f) Evaluation was not conducted for Ala Moana Regional Park because none of the alternatives would require the acquisition of park property. Although, the In-Town BRT system would displace on-street parking on Ala Moana Boulevard (see Section 4.3 of the EIS), which is used by park patrons on Sundays and certain holidays, this is not considered a Section 4(f) "use" because the loss of this parking would not impair the functions of Ala Moana Regional Park. The parking on Ala Moana Park Drive, Ala Moana Recreation Area (Magic Island) and other locations within the park will not be affected.

14. *A listing of the status of each permit or approval is required by HAR §11-200-17(h). Please add this to your permits chart in chapter 7.5 in the final EIS. If you have not yet applied for some of the permits, then list the expected date of application.*

**Response:** The tables have been revised to indicate the status of each permit or approval and expected date of application.

#### Part B - SDEIS

15. *Public meetings: This office received complaints regarding the method of public input during the community presentations. Comments only were recorded, but there was no forum for open dialog in which attendees could interact with one another and with the presenters. In the final EIS, give a description of the methods used to solicit and record comments if the above is incorrect. Also, following Table A-4, include a brief summary of the issues raised.*

**Response:** We are aware of a single complaint which was in reference to the format SDEIS April 20, 2002 public hearing. This does not reflect the working group or other public meeting formats. Nor does it recognize the City Council's public hearing meetings on the BRT during the City budget and Public Facilities Map both of which were occurring around this same time.

The April 20, 2002 public hearing was intentionally set-up to allow public dialogue. For the first hour, there was an open house where attendees could view the various project components (engineering, visual, history, traffic, Act 50, etc.), which were displayed on boards and have an open dialog with the project team members and one another. To encourage attendees that were reluctant to speak in front of a large group of people, we had the court reporter available to record comments on a one-on-one basis before the formal public hearing began. It should be noted that only one individual took advantage of recording their comments one-on-one with the court reporter. After the open house, the formal public hearing started, speakers were allowed three minutes to give their testimony, which the court reporter recorded. People wanting to speak could sign-up at any time during the public hearing and were allowed to speak.

16. *Compatibility with land use policies: In addition to consistency with land use plans, list those public policies with which the Primary Corridor is in conflict, and how the conflict or inconsistency will be handled.*

**Response:** The plans and policies described in the DEIS, SDEIS, and FEIS Sections 3.1 and 5.1 are those relevant to the project site (e.g. PUC Development Plan) or the proposed project (e.g. Transportation for Oahu Plan 2025). The BRT alternative is consistent with all the relevant plans and policies.

17. *Definitions: acronyms. Section 5.10.4 lists "Kupuna hui." Please add this term to the glossary. In Table S.4-1 define G.O., UZA and FGM, or add them to the acronyms list.*

**Response:** The FEIS's glossary includes Kupuna hui. Table S.4-1 defines the requested acronyms.

18. *Unresolved issues: There need to be listed in a separate section of the final EIS, along with a discussion of how they will be resolved, or an explanation for proceeding with the project if they are not resolved. Also include a synopsis of this discussion in the summary section.*

**Response:** The summary contains an "unresolved issues" section and addresses how these issues will be resolved.

19. *If mitigation measures for an issue are not yet ready to be selected, you may list all possible mitigation measures and indicate that measures will be chosen from that list at the appropriate time.*

**Response:** Where mitigation measures have not been selected, the FEIS lists the possible mitigation measures and indicates the final mitigation will be chosen from those presented.

20. *Visual impacts (Section 5.4.2): What are the visual impacts in the Special Districts and how will they be mitigated?*

**Response:** Depending on the structure (e.g., shelters) allowed for the transit stop, there might be no visual impacts in a particular special district. Some of the special districts are historic, such as Chinatown, and the project's memorandum of agreement will specify the physical parameters of transit stops in the historic districts. In other special districts, the transit stops will abide by the land use ordinances specifically developed for these districts.

21. *Ground water impacts (Section 5.8.2): Indicate the outcome of your coordination with the EPA and mitigation measures planned.*

**Response:** Coordination with EPA is continuing. Proposed mitigation measures center around compliance with regulations for underground storage tanks and the containment of runoff and inadvertent material releases from the park-and-rides and from the maintenance facility.

22. *Loss of parking and loading zones (Sections 4.3.4, 4.4.4, 5.11.f): What mitigation measures are planned to mitigate the loss of street parking on, among other locations, Ala Moana Boulevard along Ala Moana Park, and the loss of loading zones?*

**Response:** As discussed in Section 4.3.4 of the MIS/DEIS and the SDEIS, parking demand in the PUC is expected to decline under all Build alternatives, especially along the transit spine in the Refined BRT Alternative, because transit is expected to divert people from driving personal vehicles. In areas where a large concentration of parking spaces would be affected, replacement parking in new off-street parking facilities would be considered, but only if they meet other livable community objectives and are the result of community-based planning. The community planning

Ms. Genevieve Salmonson  
Page 6  
November 13, 2002

process will be an integral part of the design phase to help mitigation any potential parking and loading impacts to specific neighborhoods. It will not be feasible to provide replacement parking as mitigation for parking impacts on Ala Moana Boulevard. However, replacement parking will be provided in the neighborhood for impacts on University Avenue. On Kuhio Avenue in Waikiki, turnout bays will be provided to continue allowing loading during designated hours.

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover to confirm distribution of the FEIS. We appreciate your interest in the project.

Sincerely,

  
CHERYL D. SOON  
Director



STATE OF HAWAII  
OFFICE OF HAWAIIAN AFFAIRS  
711 KAPOLANI BOULEVARD, SUITE 500  
HONOLULU, HAWAII 96813  
September 7, 2000

Ms. Cheryl D. Soon, Director  
City & County of Honolulu  
Department of Transportation Services  
711 Kapiolani Blvd., Suite 1200  
Honolulu, Hawai'i 96813

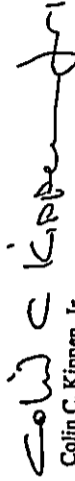
Subject: Major Investment Study/Draft Environmental Impact Statement for  
Primary Corridor Transportation Project  
EIS# 419

Dear Ms. Soon,

Thank you for the opportunity to review and respond to the above-referenced document. The Office of Hawaiian Affairs reaffirms our previously submitted comments in our EISPN response letter dated May 28, 1999 and your department's reply of August 16, 2000.

If you have any questions, please contact Ken R. Salva Cruz, Policy Analyst, at 594-1847.

Sincerely,

  
Colin C. Kippen, Jr.  
Deputy Administrator

cc: Board of Trustees  
OEQC  
Parsons Brinckerhoff Quade & Douglas, Inc.  
File

PHONE (808) 541-1338

FAX (808) 541-1345



STATE OF HAWAII  
OFFICE OF HAWAIIAN AFFAIRS  
711 KAPOLAHU BOULEVARD, SUITE 600  
HONOLULU, HAWAII 96813

RECEIVED  
02 APR 2 16  
HRD 02/159

March 21, 2002

Ms. Cheryl D. Soon, Director  
Dept. of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, HI 96813

Dear Ms. Soon:

Subject: Primary Corridor Transportation Project

We have received and reviewed the supplemental draft. We do not have substantive comments to offer relating to the implementation or revision of the plan. From review of the materials, OHA understands that your determination is that no archaeological resources are anticipated to be affected by this undertaking. OHA will rely on your assurances that proper mitigation and consultation shall occur should any unanticipated or unidentified cultural, historic, or burial sites or items be encountered during project development.

Thank you for the opportunity to review and comment relating to your SDEIS document. If you have any questions, please contact Wayne Kawamura, Policy Analyst at 594-1945, or email him at waynek@oha.org.

Sincerely,

*Colin Kippen, Jr.*  
Colin Kippen, Jr.  
Deputy Administrator

CK:wk  
cc: BOT  
ADM

Mr. Cheryl D. Soon  
May 28, 1999  
Page two

A Hawaiian cultural expert. We suggest that this person(s) should be recognized within the Hawaiian community for their cultural expertise. Hawaiian culture exists and is practiced every day in Hawaii. We caution that the concerns of the community will not be addressed if the cultural analysis is provided solely by an archaeologist or anthropologist.

Again, thank you for the opportunity for early participation in this project. If you have any questions, please contact Lynn Lee, EIS Planner at 594-1934.

Sincerely,  
*C. Schwan*  
Lead and Senior Researcher Division Office  
Board of Trustees

RECEIVED

JUN 1 10 21 AM '02



STATE OF HAWAII  
OFFICE OF HAWAIIAN AFFAIRS  
711 KAPOLAHU BOULEVARD, SUITE 600  
HONOLULU, HAWAII 96813

Mr. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813

Re: Primary Corridor Transportation Project

Dear Ms. Soon:

Thank you for the opportunity to comment on the Notice of Intent to prepare and Environmental Impact Statement for the Primary Corridor Transportation Project. We would like to thank Pats Kiyomoto from your office for taking the time to review the project with us on May 21, 1999.

As our meeting, we discussed the possible routes and modifications of the system. Our main concern is for routes that will involve construction or previously constructed routes. When the location of existing routes, cultural or archaeological resources in such areas, the routes or modifications that affect these areas we urge you to prepare a detailed archaeological and cultural resources survey and address mitigation in a manner which will minimize the concerns of the native Hawaiian community.

In order to accomplish the task we request that:

- An archaeological survey of the project area must be completed.
- A determination of eligibility for the HTR register must be completed for cultural/archaeological sites found within the project area.
- Mandatory pre-decision consultation with OHA, as required by the National Historic Preservation Law, must occur.

In addition, gathering and redacting rights may exist within the project corridor in those areas which have not been previously used for transportation. It is essential that the balance of these rights be determined early. In order to accomplish this, we suggest that you work with

DEPARTMENT OF TRANSPORTATION SERVICES  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE WOOD \* MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD04/02-01241R

Mr. Clyde Namuo  
Page 2  
November 13, 2002

**Response:** An Act 50-Cultural Impact Assessment Project Report was prepared and made part of the SDEIS and FEIS. OEQC and OHA were consulted on the scope of the study, which included convening a panel of cultural experts to determine whether the BRT Alternative would adversely affect gathering, religious and cultural activities occurring in the project area. OHA participated in the panel discussions.

Part B - SDEIS Comments

3. From review of the materials, OHA understands that your determination is that no archaeological resources are anticipated to be affected by this undertaking. OHA will rely on your assurances that proper mitigation and consultation shall occur should any unanticipated or unidentified cultural, historic, or burial sites or items be encountered during project development.

**Response:** OHA is correct in its assumption.

We will send you a copy of the Final Environmental Impact Statement under separate cover. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

Mr. Clyde Namuo  
Administrator  
Office of Hawaiian Affairs  
Slate of Hawaii  
711 Kapiolani Boulevard, Suite 500  
Honolulu, Hawaii 96813

Dear Mr. Namuo:

Subject: Primary Corridor Transportation Project

This is in response to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your September 7, 2000 letter regarding the MIS/DEIS. Part B responds to your March 21, 2002 letter regarding the SDEIS.

Part A - MIS/DEIS Comments

1. Our main concern is for routes that will involve coastal or previously coastal areas. In those areas, the likelihood of finding burials, cultural or archaeological resources is much greater. When routes or configurations affect those areas we urge you to prepare detailed archaeological and cultural information and to address mitigation in a manner which will minimize the concerns of the native Hawaiian community. In order to accomplish this task we suggest that 1) an archaeological survey of the project area must be completed. 2) A determination of eligibility for the NHR register must be completed for cultural/archaeological sites found within the project area. 3) Meaningful, pre-decision consultation with OHA, as required by the National Historic Preservation Law, must occur.

**Response:** 1) An archeological assessment has been prepared and the results of the assessment and included in the FEIS. 2) Potential historic properties found within the area of potential effect have been evaluated in accordance with Federal and State Significance Criteria. 3) The Office of Hawaiian Affairs has been consulted and will continue to be consulted as the project moves forward.

2. In addition, gathering and religious rights may exist within the project corridor in those areas which have not been previously used for transportation. It is essential that the existence of these rights be determined early. In order to accomplish this, we suggest that you work with a Hawaiian cultural expert. We suggest that this person(s) should be recognized within the Hawaiian community for his/her cultural expertise. Hawaiian culture exists and is practiced every day in Hawaii. We caution that the concerns of the community will not be addressed if the cultural analysis is provided solely by an archaeologist or anthropologist.



UNIVERSITY OF HAWAII

SENIOR VICE PRESIDENT FOR ADMINISTRATION

MEMORANDUM

November 6, 2000

Ms. Cheryl D. Soon  
November 6, 2000  
Page 2

TO: Cheryl D. Soon, Director  
City and County of Honolulu  
Department of Transportation Services

FROM: Allan Ah San  
Associate Vice President for Administration

SUBJECT: Major Investment Study  
Draft Environmental Impact Study  
Primary Corridor Transportation Project

We have reviewed the Draft Environmental Impact Statement (DEIS) for the Primary Corridor Transportation Project. If the project results are successful, the University of Hawaii System island wide will benefit by becoming more convenient and accessible. The strategy to mitigate traffic congestion by getting people out of their cars while they move around the community and encouraging convenient, attractive public transportation, bicycling and pedestrian linkages will be beneficial to our quality of life now and in the future.

The University supports various forms of public and private transportation that will move larger quantities of people and reduce individual vehicular usage. The Master Plan for the University of Hawaii at Manoa campus has long included access for rapid transportation as illustrated by the right-of-way through the lower campus. Further, the master plan for the central campus emphasizes pedestrian circulation through paths, malls and plazas excluding vehicles except for emergency and service use. Similar to the hub-and-spoke concept described in the DEIS, the University master plan calls for "gateways" which are the main pedestrian entrances to the primary malls on the campus. The University gateway at Metcalf and the Dole Street gateway near Law School are the two primary pedestrian entrances we would like to see developed as links between various forms of transportation.

Currently, we are working with the City and County of Honolulu to develop the Sinclair Circle bus stop noted on the DEIS as the UH Manoa Transit Stop. Questions relative to the DEIS and this designated transit stop are as follows:

1. Currently, Sinclair Circle is shared by vehicles as a drop-off and pick-up location and by vehicles entering and exiting Bachman Hall parking lot. For a bus to turn around towards makai, it must swing across three lanes of University Avenue traffic near a busy intersection. How will this hazardous condition or safety issue be resolved?
2. The Draft Conceptual Design Drawings indicate a radius turn that would appear to eliminate one of the large monkey pod trees lining both sides of University Avenue. This was not listed in the DEIS environmental analysis although the document notes the area as a "special view opportunities area." Are the trees to remain?
3. Will the transit system have an impact on the historic Founders' Gate (1933) on the corner of University Avenue and Dole Street? The Founders' Gate was not documented in the DEIS although it is listed with the State Historic Preservation Division and is within the University of Hawaii's Historic District.
4. The DEIS delineates the University of Hawaii Historic District on figure 3.10-1A and lists it along with Wist Hall in Table 3.10-1 yet the boundary excludes the College of Education and Lab School where Wist Hall, as well as other Historic properties are located. What are the boundaries of the District?
5. The DEIS indicates the transit system is to be located on a median strip. How will this impact turning lanes, such as the left and right turns from University Avenue to Dole Street?

c: The Honorable Benjamin J. Cayetano  
Parsons Brinckerhoff Quade and Douglas, Inc.  
Kalvin Kashimoto

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
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DEPUTY DIRECTOR

November 13, 2002

TPD1100-05423R

Mr. Allan Ah San  
Associate Vice President of Administration  
University of Hawaii  
2444 Dole Street  
Bachman Hall  
Honolulu, Hawaii 96822

Dear Mr. Ah San:

Subject: Primary Corridor Transportation Project

This is in response to your November 6, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. Similar to the hub-and-spoke concept described in the DEIS, the University master plan calls for "gateways" which are the main pedestrian entrances to the primary malls on the campus. The University gateway at Metcalf and the Dole Street gateway near Law School are the two primary pedestrian entrances we would like to see developed as links between various forms of transportation.

**Response:** Meetings were held with UH - Manoa Facilities personnel to discuss BRT stop design treatments for Sinclair Circle. Goals used to develop concepts included preserving the tree canopy, keeping the lawn area open, and possibly incorporating Bachman Hall and Founders Gate design features. Additionally, the BRT shelter could be the impetus for a student-gathering place beyond the shelter and incorporate an arcade. The proposed parking structure was assumed to be 120 feet wide with two levels, possibly three. UH - Manoa Facilities personnel suggested that the Sinclair Circle stop should incorporate more of the Founders Gate design, with low walls and UH insignia. In addition to concepts for the Sinclair Circle BRT stop, concepts for the Puck's Alley BRT stop were presented that showed how more pedestrian-friendly linkages could be established to the UH campus.

2. Currently, we are working with the City and County of Honolulu to develop the Sinclair Circle bus stop noted on the DEIS as the UH Manoa Transit Stop.

**Response:** Using the Sinclair Circle as a BRT stop is compatible with the bus stop currently being developed. Coordination with the UH-Manoa Facilities personnel has continued throughout the project development. The project personnel currently working on developing the Sinclair Circle bus stop also attended those meetings.

Mr. Allan Ah San  
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3. Currently, Sinclair Circle is shared by vehicles as a drop-off and pick-up location and by vehicles entering and exiting Bachman Hall parking lot. For a bus to turn around towards makai, it must swing across three lanes of University Avenue traffic near a busy intersection. How will this hazardous condition or safety issue be resolved?

**Response:** A new traffic signal will be provided on University Avenue at Sinclair Circle to accommodate the safe turning of BRT vehicles and buses.

4. The Draft Conceptual Design Drawings indicate a radius turn that would appear to eliminate one of the large monkey pod trees lining both sides of University Avenue. This was not listed in the DEIS environmental analysis although the document notes the area as a "special view opportunities area." Are the trees to remain?

**Response:** One monkeypod and three other trees (two shower trees and one false olive tree) at Sinclair Circle will need to be relocated on-site. In addition, the rainbow shower saplings in the University Avenue median between Kepiokiani Boulevard and Dole Street, would be affected. The tree impacts associated with the Refined LPA were included in the SDEIS and are in the FEIS.

5. Will the transit system have an impact on the historic Founders' Gate (1933) on the corner of University Avenue and Dole Street? The Founders' Gate was not documented in the DEIS although it is listed with the State Historic Preservation Division and is within the University of Hawaii Historic District.

**Response:** Section 3.10.2 of the MIS/DEIS under the University of Hawaii Historic District, identified the historic Founders Gate. The Refined LPA will not affect this historic property because University Avenue will not be widened along that section.

6. The DEIS delineates the University of Hawaii Historic District on figure 3.10-1A and lists it along with Wist Hall in Table 3.10-1 yet the boundary excludes the College of Education and Lab School where Wist Hall, as well as other historic properties are located. What are the boundaries of the District?

**Response:** Figure 3.10-1A of the MIS/DEIS erroneously delineated the University of Hawaii Historic District. The figure has been corrected in the FEIS to include the Wist Hall area.

7. The DEIS indicates the transit system is to be located on a median strip. How will this impact turning lanes, such as the left and right turns from University Avenue to Dole Street?

**Response:** At Dole Street, the BRT will be operating in an exclusive median lane on University Avenue in the makai direction and in a curbside general-purpose lane mauka bound. There will be the same number of lanes as today mauka bound, and one less lane mauka bound at the Dole Street intersection. The existing number of turning lanes will be maintained.

We will send you a copy of the Final Environmental Impact Statement under separate cover. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director



# University of Hawaii at Mānoa

Environmental Center  
A Unit of Water Resources Research Center  
2540 Campus Road • Crawford 317 • Honolulu, Hawaii 96822  
Telephone: (808) 956-7383 • Facsimile: (808) 956-3900

November 3, 2000  
RE: 0713

Ms. Cheryl Soon  
City and County of Honolulu  
Department of Transportation Services  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813

Dear Ms. Soon:

Primary Corridor Transportation Project  
Major Investment Study/Draft Environmental Impact Statement  
Honolulu and Ewa, Oahu

The City and County of Honolulu Department of Transportation Services proposes the implementation of programs to address existing and future mobility constraints in the primary transportation corridor of Oahu, which stretches from Kapiolani in the Ewa district to the University of Hawaii at Manoa and Waikiki in the Honolulu district. The purposes of the project are to (1) "increase the people-carrying capacity of the transportation system in the primary transportation corridor by providing attractive alternatives to the private automobile" (2) support desired development patterns, (3) improve the transportation linkage between Kapiolani and Honolulu's Urban Core" (PUC), and (4) "improve the transportation linkage between communities and the PUC" (page 1-4 to 1-6).

This review was conducted with the assistance of Karl Kim, Urban and Regional Planning, and Panos Prevedouras, Civil Engineering.

### General Comment

This Major Investment Study / Draft Environmental Impact Statement (MIS/DEIS) provided much useful information on the existing conditions within the project area, as well as on the proposed plans. However, there were several sections that could have been developed more fully in order to provide a more complete picture of the proposal. These sections include the discussion of alternatives, the discussion on the methodology used to predict traffic impacts, safety issues, energy impacts, and environmental justice.

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Ms. Soon  
November 6, 2000  
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### Discussion of Alternatives

Our reviewers felt that there was insufficient consideration of alternatives. Specifically, additional alternatives were not adequately sought-out, initial alternatives such as the light rapid-transit alternative were eliminated prematurely, and additional alignments and siting for automated, grade-separated people-mover systems could have been further studied.

In addition to the No build, Transportation System Management (TSM), and Bus Rapid Transit (BRT) alternatives, the City should have included a rail alternative. The logic and justification for excluding the fixed rail option is not adequately described. It is not clear why a grade-separated, automated system - using technology similar to Vancouver's system or various Airport People Movers - was not included for analysis. Based on the information furnished in Section 2.6.1 (Alternatives Considered and Eliminated), it appears that there are distinct advantages of grade separation and automation. The problems seem less to do with the technology, per se, than with routing, siting, visual obstructions, and other factors. Automation, moreover, offers clear advantages in terms of controlling labor costs and providing more flexible, more demand responsive service. To eliminate this technology simply because it failed to garner the necessary support in the past - seems to be a somewhat hasty decision. There was a tremendous amount of information and knowledge gained during the past efforts to implement such a system. That expertise could be easily included, updated, and presented in this document. Moreover, the concern in the past was related to cost and visual obstruction. A more detailed analysis of total costs, including the differences in operating costs for an automated, grade-separated system and the proposed BRT alternative would provide instructive. In any case, the Environmental Impact Statement (EIS) is required to "describe in a separate and distinct section alternatives which could attain the objectives of the action, regardless of cost, in sufficient detail to explain why they were rejected" (Hawaii Administrative Rules 11-200-17(f)).

The MIS/DEIS failed to realize the positive aspects of automobile-based transport and should have explored such dimensions. For this reason alone, a major mass transit system expansion will fail to produce sufficient benefits in the absence of a major economic or fuel crisis. A sample of some research on the efficiency, effectiveness, and desirability of automobile-based transport is offered below.

"The stereotypes suggest that for most commuters the trek by car to work is a miserable bore, especially when the roads are congested. ... Our research clearly indicates that people like to travel by car. And they do so for many reasons that may have nothing to do with practical considerations like getting to work or gathering provisions. ... Some people find their commute time creates a much-needed transition, or buffer between their states of mind at work and home." Mokhtarian and Salomon, University of California Transportation Center, 1999

"In a recent survey of lower-skilled workers in the Detroit area, researchers analyzed the job-search behavior of unemployed workers, finding large differences between the patterns of those who owned cars compared with those who did not. Those with cars searched for work over a wider area and range of neighborhoods. ... An analysis of program attrition was conducted by the Manpower Demonstration Research Corporation. The DMRC report concluded

that auto ownership was an important prerequisite to participation in the program, to completion of the job-training and ultimately to getting jobs." O'Regan and Quigley, University of California Transportation Center, 1998

"In 1980 the U.S. Department of Energy found that automobiles used an average of 4,782 BTU of energy per passenger per mile - 1.7 times more than buses and 1.6 times more than rail. But by 1993 the average auto consumed only 3,593 BTU per passenger mile. Compare this with buses, which used 4,374 BTU per passenger mile, and rail, at 3,687 BTU per passenger mile." Sarmiento, University of California Transportation Center, 1996

"National debate is unfolding about transportation policy in the context of environment, life-style and economic growth. ... Neither political nor public will exists to support policies, regardless of their environmental benefits, that involve significant sacrifice or depart radically from the status quo." Deen and Skinner, Transportation Research Board, 1994

#### BRT routes

There should be no BRT east of the Central Business District (Downtown). A bus-exclusive TSM system using hybrid buses that reduce noise and pollution could run on exclusive lanes on King and Beretania in the East-West direction and on University Avenue on the North-South direction including an exclusive bridge to Waikiki. Private circulators (we have several existing ones) between Waikiki and the Convention Center, Ala Moana, Aloha Tower, (w/leil and the airport should be encouraged. Incentives should also be given for the acquisition of quieter and cleaner emission vehicles by private companies.

Table 1.2-8 presents some important numbers. Although the urban core shows as having the largest demand for trips, most of them require extremely dense bus routes in order to be covered. The BRT will do little to serve these trips because of the large variety of purposes and destinations. BRT should focus on the leeward Oahu traffic which is expected to grow rapidly and already experiences a long and slow commute. If many of these trips to the urban core are removed, more local trips within the urban core can occur at reasonable levels of service.

According to this EIS, the BRT would cut travel time from the University of Hawaii at Manoa (UHM) to downtown by half. However, the demand for students and faculty that take this trip is low. Most of the faculty and staff reside in Manoa and East Honolulu and most of the students reside in Leeward and Windward Oahu. A BRT connection to UHM is not needed.

#### Transportation Impacts

It was difficult to evaluate the quality of the travel demand forecasts and ridership estimates contained in the EIS due to a lack of information on methodology procedures and background data. Chapter 4 did not adequately describe the modeling procedures, the data used, the validity and reliability of the data, the source of the data used for calibration, validation, and prediction. Information on trip generation, distribution, modal split, and network assignment is also lacking. Basic information such as trip tables, zone-to-zone analysis of population, employment, and trip-making behavior was not included. Integration of vehicle, transit, pedestrian, and bicycling data in the modeling process presents special methodological challenges which should be described more fully. The EIS should contain a more detailed

discussion on the modeling procedures and provide basic data so that the forecasting procedure can be evaluated.

One example of where methodological would have been helpful include on page 4-10 where section 4.2.1 states that "The travel demand model used in this MIS/DEIS assumes demand spreading over a wide peak period so rescheduling is already accounted for." Is this a capacity-retained spreading or was it done based on behavioral principles? Which ones? For instance, we know that flextime and similar plans have largely failed in Honolulu because although several employers allow flextime, school-children have fixed start times which, in-turn, defines a family's departure time, mode choice and route. How were real constraints such as this one accounted for?

Honolulu is quite unique in many respects including travel. For example, many people have multiple jobs, the majority of students are commuters and part-timers, there is no school bus service which, in turn, generates an unusually large number of drop-off/pick-up trips. Did the model account for all these facts? If so, how was a 61% increase in mass transit ridership from 1991 to 2025 forecast? How much did ridership of TheBus increase in the 6 months that gasoline price increased by 60%?

Delays due to construction have not been accounted for. There have been several studies on this subject, some of which estimated that several heavy-construction transportation projects created such congestion during construction that their delay-reduction benefits would not be able to balance construction delays for 10 to 30 years.

It is difficult to accept the LOS in Table 1.2-11 as credible. The results are likely and one can easily arrive at them by multiplying existing traffic levels with a beefy growth factor. However, the fact is that congestion is self-limiting: people find ways around it without changing travel mode from automobile to mass transit. Time and again, history has shown that new transit services typically cannibalize existing transit services and carpools and fail to attract family car pools and solo-riding motorists who consist the supermajority of commuters.

The estimated delay per vehicle for the year 2025, are questionable (Table 4.2-2). Vehicular delay will skyrocket on arterials from which 1 to 3 lanes were taken away if realistic assumptions in BRT ridership are used.

No build: = 12.3 minutes TSM = 11.6 minutes BRT = 12.1 minutes  
The study must present the reader with current numbers (or numbers from the recent past) so that proper associations can be made using a base with which the reader is familiar with (and is reliable compared to forecasts). This applies to most of the estimates presented throughout the report.

#### Safety Issues

The study does not adequately describe transit safety issues regarding collisions with other motor vehicles and pedestrians. The primary focus of the study consisted of details such as seating and comfort level, but there was no discussion of safety issues for pedestrians, bicyclists, and other motorists. A traffic safety section should be adequately developed.

#### Energy Impacts

The EIS does not adequately describe energy impacts such as the cost of fuel and other uncertainties that could affect transportation in the urban core. While there is a comparison of energy consumption among the different alternatives, there should be more discussion of the



impacts of changing oil prices on each of the alternatives, and how that would affect relative ridership.

**Environmental Justice**

The section on Environmental Justice (as defined by Title VI) is inadequate. There should be a more complete discussion of the impacts of the project on minorities, low income households, persons with disabilities, and other groups. In addition to examining the increase in opportunities for disadvantaged groups, there should be a more detailed discussion of the extent to which environmental impacts - including pollution, noise, congestion, safety, and others - affect certain neighborhoods or population groups according to the alternatives considered. The report should summarize performance measures for each of the alternatives and their impacts on population subgroups.

**Conclusion**

Thank you for the opportunity to comment on this Major Investment Study/Draft Environmental Impact Statement.

Sincerely,

*Peter Rappa*  
Peter Rappa  
Environmental Review Coordinator

cc: Robert Braman, Parsons Brinckerhoff Quade and Douglas, Inc.  
OEQC  
James Moncur, Water Resources Research Center  
Karl Kim, Urban and Regional Planning  
Panos Prevedouras, Civil Engineering



MAY 8 2002

**UNIVERSITY OF HAWAII  
ENVIRONMENTAL CENTER**

Cheryl Soon  
City and County of Honolulu  
Department of Transportation Services  
650 South King Street, 3rd Floor  
Honolulu, HI, 96813

Dear Ms. Soon:  
Supplemental Draft Environmental Impact Statement  
Primary Corridor Transportation Project  
Honolulu, Oahu

May, 7, 2002  
RE: 0724

Since publication of the Primary Corridor Transportation Project, Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) (August 2000), and as a result of continuous public involvement and the working groups, the Bus Rapid Transit (BRT) Alternative has been refined. The Refined BRT Alternative analyzed in the Supplemental Draft Environmental Impact Statement (SDEIS) is the BRT Alternative discussed in the MIS/DEIS with the following major refinements: (1) Replacing the Kaonohi Street and Radford Drive ramps with a Luapele Drive ramp; (2) Adding a new In-Town BRT branch (Kaka'ako Makai Branch) running from the 'Iwilei Transit Center through downtown Honolulu, the Aloha Tower Marketplace, and Kaka'ako Makai en route to Waikiki; and (3) Retaining a short section of the University of Hawaii-Manoa (UH-Manoa) In-Town BRT alignment from Ward Avenue to Pensacola Street. In addition, a portion of the former Kaka'ako/Waikiki Branch (now being referred to as the Kaka'ako Mauka Branch) was rerouted from Richards Street to Bishop and Alaka Streets. Two new transit stops would be added to the Kaka'ako Mauka Branch. The Koko Head direction stop would be located on the 'Ewa side of Bishop Street between Queen Street and Ala Moana Boulevard; the 'Ewa bound transit stop would be located on the Koko Head side of Alaka Street, between Queen Street and Ala Moana Boulevard.

This review was conducted with the assistance of Karl Kim, PhD., Urban and Regional Planning; Panos Prevedouras, PhD., Civil Engineering; and Dave Sims, Environmental Center.

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### General Comments

Review of this document is complicated by it being a supplemental DEIS (SDEIS) augmenting numerous earlier studies and reviews, some of which are referenced in the SDEIS. However, there seem to be some omissions, perhaps because of a desire to be more succinct and to summarize what is undoubtedly a very complex, evolving project. Environmental analyses of much smaller projects clearly lay out the methodologies, models, and assumptions. This critical, billion-dollar investment study does not. As noted in §11-200-19, Hawaii's Administrative Rules (HAR):

*Care shall be taken to concentrate on important issues and to ensure that the statement remains an essentially self-contained document, capable of being understood by the reader without the need for undue cross-reference.*

In its present form, the essential mode choice and mode switching models and assumptions are all absent. Thus, the public must take the forecast volumes, transit shares and impacts on faith. In addition, there is a need to up-date and to describe the latest developments in terms of vehicle technology and system design. The final EIS would be improved not just with more discussion of the BRT technology, but also with a more complete analysis of the benefits and costs of this project. To aid in the review, the SDEIS should systematically discuss methodologies, models and assumptions. Lacking comprehensive presentations of these elements, the SDEIS in its present form is fundamentally unacceptable.

### BRT Technology

It is not clear, at present, what type of system will be adopted, either a hybrid electric bus system or perhaps some type of embedded plate technology. Indeed, at this stage one would expect much more detail as to the operating characteristics of the BRT vehicles. Given all of the developments in vehicle design and in BRT technology, there seem to be many unanswered questions regarding what the vehicles will look like, what their capacities will be, and what will be their environmental impacts (principally air and noise pollution). Without knowing more specifically what technologies will be employed and when and where they might be phased in, it seems not unreasonable to expect that the diesel bus will still dominate. Perhaps an assessment of BRT technologies and when we might expect to see more electric, hybrid, natural gas, fuel-cell, or even hydrogen powered vehicles in Honolulu might be appropriate. Indeed, an obvious comparison might be done between the costs of an embedded plate BRT system and either light rail or tramway systems which have been proliferating throughout many cities in the world.

The in-town BRT is heavily dependent on imported technology, and its quiet and non-polluting claims are dubious. The generation of electric power for the BRT (a very inefficient process of burning fuel to generate electricity and then transmit it with significant losses over power lines), as well as the greatly increased levels of traffic congestion, will more than outweigh the environmental benefits of the BRT vehicles. Furthermore, if the in-town BRT proves to be a failure, these vehicles will be useless. In contrast, the regional BRT vehicles are basically buses, which can be rerouted elsewhere if the regional BRT fails to attract riders.

### Ridership

The SDEIS lacked sufficient detail to analyze the quality or reasonableness of the ridership forecasts. It was not clear from the document what method was used to forecast the ridership estimates, nor was it evident how the boardings and alightings were determined. The document should contain a brief description of the transit forecasting methodology as well as a discussion of the reliability and accuracy of the forecasts. The document should also contain more detail as to the origins and destinations of riders. Given advances in GIS and mapping technologies, it is surprising to see so little spatial analysis of the ridership patterns. Where will these riders come from? Where will they be going? What areas, neighborhoods, districts, and zones see improved service? Overall, given projected levels of growth and increases in the student population and also in the elderly population, two of the key transit-inclined population groups, the forecasts seem rather conservative.

### Alignment and Routing Issues

Knowing more about both the vehicle design as well as concerns regarding power supply, traction, etc., would also be useful in examining and evaluating potential alignment alternatives. While the regional BRT seems more straightforward in terms of route selection, the in-town BRT is much more problematic, at least in terms of route selection. It seems that there are at least three different types of BRT operating at the same time: local service, express service, and then the opportunities for some type of urban transit mall, perhaps to service Waikiki or the 'Iwilei-Downtown corridor. The ridership estimates seem more oriented towards destinations rather than origins. Perhaps more effort might be made to identify the transit dependent populations (students, elderly, persons without access to private automobiles, etc.) and to map their residences (origins) or estimate their walk and travel times to reach a BRT station. Another obvious group for which BRT may be appealing may be tourist riders.

In terms of the BRT alignment, there are two areas that could use improvement: first, service between UH and Waikiki and second, service between the main Manoa campus and the planned Kaka'ako Health and Wellness (Biotech) complex. Also, it might also be useful to re-examine the connections between all of the university campuses from Kapiolani Community College, University of Hawai'i at Manoa, downtown campuses of Hawai'i Pacific University, Honolulu Community College, Leeward Community College and the proposed campus in Kapolei (University of Hawai'i at West Oahu). In actuality, only a small proportion of our students use the bus to commute to their campuses, and the majority of them are from the windward side and the north shore. BRT will not augment the service from those areas to the campus. Most of our students lead complex lives, taking courses on campus and at community colleges, working one or more part time jobs, participating in various off-campus activities, and rearing families. A fixed mass transit system as proposed in this SDEIS is woefully inadequate for their needs. Also, the supermajority of faculty and staff reside in places west of University Avenue and will realize no benefits from the BRT. From the standpoint of the University, there is little incentive inherent in the present design proposal to abandon private vehicles in favor of a public mass-

transit system, yet as noted above, the student population is potentially one of the most significant BRT ridership components.

Our reviewers suggest that the document's emphasis on the in-town part is unwarranted and unnecessary. The BRT might benefit long hauls from the Ewa plains to Kalihi and the city center. All emphasis should be placed on the regional BRT, and the TSM option should be adopted for the in-town portion. This will yield a transportation alternative that is more economical, more acceptable to the public, and more effective.

#### Transportation Impacts.

The SDEIS needs to describe more fully the transportation impacts of the proposed BRT. The document should contain a more complete discussion of the impacts to motorists, not only in terms of intersection LOS, but also in terms of roadway capacity, link volumes, vehicle speeds, and travel times. An associated concern involves traffic safety, not just in terms of vehicle-to-vehicle collisions, but also the risks of accident involvement for bicyclists, pedestrians, and BRT users. The crucial section on transportation impacts does not adequately demonstrate how the BRT provides an attractive alternative to the private automobile, nor does it provide sufficient detail as to how the proposed system supports desired development patterns, particularly in terms of increasing the attractiveness of in-town living. The SDEIS does a poor job of describing which residents, commuters, and transit users will experience enhanced mobility, reduced travel times and improved quality of life.

#### Land Use Interactions.

The SDEIS should describe more fully the changes in land use that are expected to occur over time as a result of the BRT investment. In addition to intensification of use around stations and support of new development within the urban core, it can be anticipated that certain areas might experience changes in land use. Opportunities for more in-town residential development, as well as other types of growth, might be supported by enhanced transit services.

#### Financing and Cost Recovery.

Given that certain landowners and businesses are likely to benefit more from the BRT, it makes economic sense to consider various value re-capture techniques for financing this project. In particular, the benefits to Kapolei, as well as to businesses and property owners abutting the in-town BRT should be noted. Surprisingly, strategies such as tax-increment financing, special district or improvement district fees, were not evaluated as part of the financing strategy. Opportunities to leverage financing from key ridership groups such as University students and employees (U-pass program) could also boost fare box recovery. More discussion of the fare box revenues is needed, including the rationale behind the 33% recovery policy. An alternative approach is to allow fares to rise while subsidizing needy groups. Perhaps other types of taxes or tolls to finance BRT would be appropriate.

#### Concluding Thoughts

Historically, implementation cost estimates and traffic forecasts for large transportation infrastructure projects, like the proposed Bus Rapid Transit for Honolulu, have been wrong. Consider these data: The U.S. DOT analyzed ten rail transit projects implemented in the 1980's and valued at more than \$16 billion in 1990 prices. Cost overruns ranged from -10% to +106% with an average of 61%. A 1995 Danish study that analyzed costs from several transportation infrastructure projects worldwide concluded that cost overruns in the +50% to +100% range are common, and overruns in excess of 100% do occur.

Transit ridership forecasts also tend to be overly optimistic. The U.S. DOT found that actual ridership was 28% to 85% lower than forecast ridership. On average, actual ridership was 65% lower than the forecast ridership.

Careful planning and thoughtful analyses are needed to avoid the mistakes of the past. At the same time, fundamental determinants of transportation dynamics, such as energy costs, work patterns, and population demographics and distribution are subject to change, often in unexpected and rapid ways. Lacking prescience, our best alternative is to envision a preferred future, and invest in ways that facilitate rather than preclude innovation.

The SDEIS contains a tremendous amount of information, much of it well organized and clearly written. However, it also falls seriously short of the comprehensive planning document needed to inspire the vision of a preferred future for transportation on Oahu.

With each iteration, the Primary Corridor Transportation Project improves. We suggest that the present document requires further revision, addressing in particular the topics discussed in our review.

Sincerely,  
  
John T. Harrison, Ph.D.  
Environmental Coordinator

c: OEQC  
Ms. Donna Turchie, U.S. DOT, Region IX  
Janice Moncur  
Karl Kim  
Panos Prevedouras  
Dave Sims

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FREELY HARRIS  
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DEPUTY DIRECTOR

TPD502-01840R  
TPD502-01875R

November 13, 2002

Mr. John T. Harrison  
Environmental Coordinator  
University of Hawaii  
Environmental Center  
2500 Dole Street  
Krauss Annex 19  
Honolulu, Hawaii 96822

Dear Dr. Harrison:

Subject: Primary Corridor Transportation Project

This is a combined response to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). Your comments on the SDEIS were received on May 7, 2002, which was within the comment period. Your comments on the MIS/DEIS were dated November 3, 2000 letter were not received until May 8, 2002. We are responding in two parts. Part A responds to your SDEIS comments and Part B responds to your MIS/DEIS comments.

Part A - SDEIS Comments

1. *Review of this document is complicated by it being a supplemental DEIS (SDEIS) augmenting numerous earlier studies and reviews, some of which are referenced in the SDEIS. However, there seem to be some omissions, perhaps because of a desire to be more succinct and to summarize what is undoubtedly a very complex, evolving project. Environmental analyses of much smaller projects clearly lay out the methodologies, models, and assumptions. This critical, billion-dollar investment study does not. As noted in §11-200-19, Hawaii Administrative Rules (HAR):*

*Care shall be taken to concentrate on important issues and to ensure that the statement remains an essentially self-contained document, capable of being understood by the reader without the need for undue cross-reference.*

*Response: Please note that the comment reflects only part of §11-200-19 Hawaii Administrative Rules. The full section states: "Environmental Impact Statement style. In developing the EIS, preparers shall make every effort to convey the required information succinctly in a form easily understood, both by members of the public and by public decision-makers, giving attention to the substance of the information conveyed rather than to the particular form, or length, or detail of the statement. The scope of the statement may vary with the scope of the proposed action and its impact. Data and analyses in a statement shall be commensurate with the importance of the impact, and less important material may be summarized, consolidated, or simply referenced. Statements shall indicate at appropriate points in the text any underlying studies, reports, and*

Mr. John T. Harrison  
Page 2  
November 13, 2002

other information obtained and considered in preparing the statement, including cost benefit analyses and reports required under other legal authorities. Care shall be taken to concentrate on important issues and to ensure that the statement remains an essentially self-contained document, capable of being understood by the reader without the need for undue cross-reference. [Eff 12/6/85; am and comp AUG 31 1996] (Auth: HRS §343-5, 343-6) (Imp: HRS §343-6)"

The DEIS, SDEIS, and FEIS conform to §11-200-19 and present information succinctly and easily understood by the public and decision makers.

2. *In its present form, the essential mode choice and mode switching models and assumptions are all absent. Thus, the public must take the forecast volumes, transit shares and impacts on faith.*

*Response: The SDEIS states that the travel demand forecasting procedures maintained by the OMPO were used for the project (page 4-4). The OMPO procedures/models are used for all regionally significant travel demand forecasting by the State and City. Dr. C.S. Papacostas, Civil Engineering Department, University of Hawaii, was the technical director for the OMPO model development. As a result of your comment, the FEIS Chapter 4 contains a travel demand forecasting procedures summary.*

3. *In addition, there is a need to update and to describe the latest developments in terms of vehicle technology and system design.*

*Response: The SDEIS describes the vehicle service and performance standards in sufficient detail beginning on Page 2-19. Vehicle technology options and the final selection process are also disclosed in Page 2-23 through 2-25. The vehicle technology and system design information has been further updated in the FEIS, Chapter 2.*

4. *The final EIS would be improved not just with more discussion of the BRT technology, but also with a more complete analysis of the benefits and costs of this project.*

*Response: The DEIS, SDEIS, and FEIS, Chapters 2 discuss the BRT technologies succinctly and in a manner easily understood by the public and decision makers. The DEIS, SDEIS, and FEIS include complete project costs and the benefits and impacts associated with the project.*

5. *To aid in the review, the SDEIS should systematically discuss methodologies, models and assumptions. Lacking comprehensive presentations of these elements, the SDEIS in its present form is fundamentally unacceptable.*

*Response: The methodologies, models, and assumptions have been adequately presented. The FEIS, Chapter 4 includes a summary of the travel demand methodology.*

6. *It is not clear, at present, what type of system will be adopted, either a hybrid electric bus system or perhaps some type of embedded plate technology.*

*Response: Since embedded plate technology (EPT) is not yet service proven, hybrid-electric buses will be deployed as an interim technology. As stated in the FEIS, Chapter 2, a decision will be made on the long-term technology in 2008.*

7. *Indeed, at this stage one would expect much more detail as to the operating characteristics of the BRT vehicles.*

Response: The FEIS, Chapter 2 discusses the BRT vehicle operating characteristics.

8. Given all of the developments in vehicle design and in BRT technology, there seem to be many unanswered questions regarding what the vehicles will look like, what their capacities will be, and what will be their environmental impacts (principally air and noise pollution).

Response: Vehicle looks will be established during the vehicle procurement process under City purchasing regulations. Capacity as discussed in Chapter 2 will be 120 persons per vehicle. The environmental impacts, including those on air quality and noise, from the use of hybrid-electric or EPT technology for the In-Town BRT are discussed in Chapter 5 of the FEIS.

9. Without knowing more specifically what technologies will be employed and when and where they might be phased in, it seems not unreasonable to expect that the diesel bus will still dominate.

Response: As discussed in Chapter 2, Section 2.5 of the FEIS, hybrid-electric buses will be used initially. The decision whether to convert to EPT will not be addressed until 2008, when it is expected to be service proven.

10. Perhaps an assessment of BRT technologies and when we might expect to see more electric, hybrid, natural gas, fuel-cell, or even hydrogen powered vehicles in Honolulu might be appropriate.

Response: As discussed in Chapter 2, Section 2.5 of the FEIS, hybrid-electric buses will be used initially, with a decision whether to convert to EPT made in 2008.

11. Indeed, an obvious comparison might be done between the costs of an embedded plate BRT system and either light rail or tramway systems which have been proliferating throughout many cities in the world.

Response: Alternatives considered and rejected are discussed in Chapter 2, Section 2.6 of the FEIS. Primary reasons for rejecting LRT are that its costs were 35% higher than for a comparable BRT system, yet BRT can provide comparable service with greater flexibility. Both technologies were based on using embedded plate propulsion since overhead contact wires that provide the traction power for light rail vehicles were determined to be unacceptable locally.

12. The In-Town BRT is heavily dependent on imported technology, and its quiet and non-polluting claims are dubious. The generation of electric power for the BRT (a very inefficient process of burning fuel to generate electricity and then transmit it with significant losses over power lines), as well as the greatly increased levels of traffic congestion, will more than outweigh the environmental benefits of the BRT vehicles.

Response: Electric propulsion technologies are much quieter than diesel technologies because electric motors are quieter than internal combustion processes. Even hybrid-diesel technologies are quieter than conventional diesel because the performance of the diesel engine is optimized for air and noise emissions and power generation. With diesel-hybrid technologies, the speed of the diesel engine is unlinked from the speed of the vehicle, and the acceleration noise emissions of a conventional diesel engine are eliminated.

Electric power on Oahu comes from a variety of sources, but at present, most of the power is generated through combustion, including the combustion of municipal solid waste. Electric transit technologies transfer air emissions from the tailpipe of vehicles, at street level, to the stack of the

central generating facility. This results in improved air quality in dense urban areas, enhancing the quality of life, and allows for the air pollutants to be controlled more effectively at the central generation facility, away from human exposure.

As more of Oahu's power is generated from renewable resources, the deployment of electric transit technologies will help displace imported oil.

As transit becomes more attractive by being buffered from increasing levels of traffic congestion, some travelers will shift from single-occupant vehicles to transit vehicles. This decrease in the use of private vehicles will save energy.

13. Furthermore, if the In-Town BRT proves to be a failure, these vehicles will be useless. In contrast, the regional BRT vehicles are basically buses, which can be rerouted elsewhere if the regional BRT fails to attract riders.

Response: EPT will only be implemented if and when it is service proven. Hybrid-electric buses will be deployed in the interim while embedded plate technology is revenue tested in other cities. The BRT technologies are discussed in the FEIS, Chapter 2.

14. The SDEIS lacked sufficient detail to analyze the quality or reasonableness of the ridership forecasts.

Response: The SDEIS states, "The information presented in this section, as well as all of the evaluation based on travel forecasts presented in later sections, has been derived from the travel demand forecasting procedures maintained by the OMPPO, the regional planning organization for the island." (page 4-4). Dr. C. S. Papacostas, Civil Engineering, UHM was a technical director for the development of the forecasting procedures for OMPPO, and the process is well documented by the OMPPO consultant. The OMPPO forecasting procedures are the only long-range regional forecasting procedures for Oahu that have been agreed upon and approved for use by the Federal, State and City agencies.

15. It was not clear from the document what method was used to forecast the ridership estimates, nor was it evident how the bearings and alignments were determined.

Response: See responses to comments #2 and #14 above.

16. The document should contain a brief description of the transit forecasting methodology as well as a discussion of the reliability and accuracy of the forecasts.

Response: The reliability and accuracy of the OMPPO forecasting procedures are discussed in the OMPPO documents. The procedures have been tested and calibrated during their development. See responses to comments #2 and #14.

17. The document should also contain more detail as to the origins and destinations of riders.

Response: The FEIS, Chapter 4 includes the origin and destination matrix of transit users. The matrix shows the transit trip exchanges between the standard 23 geographical districts on Oahu that are used by the State and City planning agencies.

18. Given advances in GIS and mapping technologies, it is surprising to see so little spatial analysis of the ridership patterns. Where will these riders come from? Where will they be going? What areas, neighborhoods, districts, and zones see improved service?

Response: See response to comment #17. A trip matrix using the 23 geographical districts is included in the FEIS, Chapter 4.

19. Overall, given projected levels of growth and increases in the student population and also in the elderly population, two of the key transit-inclined population groups, the forecasts seem rather conservative.

Response: The projected growth level used includes students and the elderly.

20. Knowing more about both the vehicle design as well as concerns regarding power supply, traction, etc., would also be useful in examining and evaluating potential alignment alternatives. While the regional BRT seems more straightforward in terms of route selection, the In-Town BRT is much more problematic, at least in terms of route selection. It seems that there are at least three different types of BRT operating at the same time: local service, express service, and then the opportunities for some type of urban transit mall, perhaps to service Waikiki or the "Wiel-Downtown corridor."

Response: All route types are described in the FEIS, Chapter 2 for the BRT and in Chapters 3 and 4 for existing services.

21. The ridership estimates seem more oriented towards destinations rather than origins. Perhaps more effort might be made to identify the transit dependent populations (students, elderly, persons without access to private automobiles, etc.) and to map their residences (origins) or estimate their walk and travel times to reach a BRT station. Another obvious group for which BRT may be appealing may be tourist riders.

Response: The Refined LPA includes a hub-and-spoke bus network that is integrally linked to BRT stations and transit centers. This system will provide comprehensive coverage throughout Oahu. In developing the island-wide network full consideration was given to conveniently serving transit dependent populations.

Connections between UH and Waikiki and between UH and the planned medical school will be by regular bus routes.

UH-Manoa, HCC, and HPU will be directly connected by the In-Town BRT. These and other campuses in the UH system will be connected via the hub-and-spoke network.

According to place of residence data provided by UH for the current enrollment, 55 percent of the UH-Manoa students live in Honolulu, 32 percent come from Leeward, and 13 percent come from Windward. Eighty-seven percent of the students (from Honolulu and Leeward) could potentially benefit from the Regional and In-Town BRT because these are the areas directly served by BRT routes. See comment #10 for the year 2025 transit use to the UH.

The Associated Students of the University of Hawaii at Manoa passed a resolution supporting the BRT project stating therein that "many students rely on TheBus system provided by the City and

County of Honolulu as their means of transportation to and from the University, work, and social events". Over 1,000 bus passes are sold from the UH-Manoa campus center monthly. Many other UH students purchase passes elsewhere or pay the single ride fare.

22. In terms of the BRT alignment, there are two areas that could use improvement: first, service between UH and Waikiki and second, service between the main Manoa campus and the planned Kakaako Health and Wellness (BioTech) complex.

Response: See response to comment #21. Direct transit service between Manoa and the Kakaako Health and Wellness complex and/or Waikiki will be considered as the University's plans progress. There may be an opportunity for private operators to provide this transit service.

23. Also, it might also be useful to re-examine the connections between all of the university campuses from Kapohalah Community College, University of Hawaii at Manoa, downtown campuses of Hawaii Pacific University, Honolulu Community College, Leeward Community College and the proposed campus in Kapolei (University of Hawaii at West Oahu).

Response: The project analysis has considered the trips between the university campuses. The hub-and-spoke planning for the primary urban center is now underway. The UH has only recently selected the West Oahu Campus location; whereas, the Leeward hub-and-spoke system has already been implemented. The DTS will adjust individual hub-and-spoke routes at the time that the West Oahu Campus is operational.

24. In actuality, only a small proportion of our students use the bus to commute to their campuses, and the majority of them are from the windward side and the north shore. BRT will not augment the service from those areas to the campus.

Response: See response to comment #21. This statement is contrary to our actual ridership numbers. CityExpress! Route A, which terminates at Sinclair Circle, has a 12,300 average weekday ridership. We see distinct ridership changes when school is in session than when it is not.

25. Most of our students lead complex lives, taking courses on campus and at community colleges, working one or more part time jobs, participating in various off-campus activities, and rearing families. A fixed mass transit system as proposed in this SDEIS is woefully inadequate for their needs.

Response: We do not concur. The all day service toll from UH provides a great degree of schedule flexibility. Route A connects to all other express and local bus routes.

26. Also, the supermajority of faculty and staff reside in places west of University Avenue and will realize no benefits from the BRT. From the standpoint of the University, there is little incentive inherent in the present design proposal to abandon private vehicles in favor of a public mass-transit system, yet as noted above, the student population is potentially one of the most significant BRT ridership components.

Response: The University is developing a very forward thinking Charter of Sustainability, which includes transportation. The University has the opportunity to readdress its parking programs and to participate in the City's BONUS program as two steps toward greater campus sustainability in transportation.

27. Our reviewers suggest that the document's emphasis on the in-town part is unwarranted and unnecessary. The BRT might benefit long hauls from the Ewa plains to Kalia and the city center. An emphasis should be placed on the regional BRT, and the TSM option should be adopted for the in-town portion. This will yield a transportation alternative that is more economical, more acceptable to the public, and more effective.

**Response:** This statement is internally inconsistent with other statements. The fundamental difference between the BRT and TSM Alternatives is whether the transit operation is provided with exclusive and/or semi-exclusive right-of-ways. The TSM Alternative, by definition, is to optimize transit service without significant capital investments. To provide an improved level of service and performance beyond the TSM, exclusive and/or semi-exclusive right-of-ways for transit become necessary for both the Regional and In-Town elements. Since the most significant share of the transit ridership is within the In-Town corridor, the higher capacity and more frequent service levels are needed in-town.

28. The SDEIS needs to describe more fully the transportation impacts of the proposed BRT. The document should contain a more complete discussion of the impacts to motorists, not only terms of intersection LOS, but also in terms of roadway capacity, link volumes, vehicle speeds, and travel times.

**Response:** Comparisons of roadway capacity and peak hour volumes are included on Tables 4.2-3 and 4.2-4 of the SDEIS. The intersection LOS analysis, based on the level of traffic delay, is the most commonly recognized and recommended method to indicate the operational characteristics of the traffic in an urbanized area. The average delay times for motorists has been added to Chapter 4 in the FEIS to further enhance the traffic impact descriptions.

29. An associated concern involves traffic safety, not just in terms of vehicle-to-vehicle collisions, but also the risks of accident involvement for bicyclists, pedestrians, and BRT users.

**Response:** Safety of BRT passengers traveling to-and-from BRT stops when located in the street median were discussed in the DEIS and SDEIS. Safety for bicyclists and pedestrians, as well as BRT passengers is discussed in Chapters 4 and 5 of the FEIS.

30. The crucial section on transportation impacts does not adequately demonstrate how the BRT provides an attractive alternative to the private automobile, nor does it provide sufficient detail as to how the proposed system supports desired development patterns, particularly in terms of increasing the attractiveness of in-town living.

**Response:** FEIS Table 4.2-7 shows the Level of Service for autos and for transit at various intersections in the PUC. What this reflects is the comparative ease with which the BRT vehicles will be able to circulate in the congested urban core compared to autos.

Ease of mobility by walking and transit (see transit/autos LOS table 4.2-7), with reduced air and noise pollution (see section 5.5.2 and 5.6.4) are all ways in which the BRT will help contribute towards making in-town living more attractive. These are part of a sustainable agenda.

31. The SDEIS does a poor job of describing which residents, commuters, and transit users will experience enhanced mobility, reduced travel times and improved quality of life.

**Response:** These topics are covered in Chapter 4 of the DEIS, SDEIS, and FEIS.

32. The SDEIS should describe more fully the changes in land use that are expected to occur over time as a result of the BRT investment. In addition to intensification of use around stations and support of new development within the urban core, it can be anticipated that certain areas might experience changes in land use. Opportunities for more in-town residential development, as well as other types of growth, might be supported by enhanced transit services.

**Response:** Chapter 5 of the FEIS includes a complete land use development impact section. The FEIS analysis shows which areas will likely experience some land use changes as a result of the BRT investment.

33. Given that certain landowners and businesses are likely to benefit more from the BRT, it makes economic sense to consider various value re-capture techniques for financing this project. In particular, the benefits to Kapolei, as well as to businesses and property owners abutting the In-Town BRT should be noted.

**Response:** At the outset of the PCTP, the City Council directed staff to look at G.O. Bonds as the method of providing local matching funds for the project.

34. Surprisingly, strategies, such as tax-increment financing, special district or improvement district fees, were not evaluated as part of the financing strategy.

**Response:** The FEIS, Chapter 6 presents the financial analysis. In 1999, prior to the development of the DEIS, the City Council passed Resolution No. 99-338 which stated, in part, that "Be it further resolved the Council strongly supports a preliminary financial approach to include phased use of federal transportation funds, local highway funds and City general obligation bonds to provide the necessary funding..." The Council's intentions are incorporated in the assumptions of DEIS, SDEIS, and FEIS financial analyses.

Prior to the DEIS, there was conceptual discussion and analysis on the potential for such strategies as partial privatization and value-capture along key corridors and transit centers. The analysis showed that the amount of funds that could be raised by these means would not be of sufficient magnitude to offset the capital costs, nor could the timing be controlled sufficiently to coincide with project costs. More importantly, FTA does not regard such sources as constituting guaranteed and committed local funding.

35. Opportunities to leverage financing from key ridership groups such as University students and employees (U-pass program) could also boost fare box recovery. More discussion of the fare box revenues is needed, including the rationale behind the 33% recovery policy. An alternative approach is to allow fares to rise while subsidizing needy groups. Perhaps other types of taxes or tolls to finance BRT would be appropriate.

**Response:** The City Council adopted Resolution 00-29, CD-1, that states in part, that the fare recovery ratio will not fall below 27 percent nor exceed 33 percent. City Council sets the policy regarding financing.

36. Historically, implementation cost estimates and traffic forecasts for large transportation infrastructure projects, like the proposed Bus Rapid Transit for Honolulu, have been wrong. Consider these data: The U.S. Dept. analyzed ten rail projects implemented in the 1980's and valued at more than \$16 billion in 1990 prices. Cost overruns ranged from -10% to +106% with

an average of 61%. A 1995 Danish study that analyzed costs from several transportation infrastructure projects worldwide concluded that cost overruns in the +50% to +100% range are common, and overruns in excess of 100% do occur.

**Response:** The studies referred to are outdated. Data from more recent transit projects documented in the 1999 GAO Report "Status of New Starts Transit Projects with Full Funding Grant Agreements" indicate that cost containment efforts by FTA and local agencies have been effective in keeping projects within their cost budgets. Also, GAO Report Number 01-984 examines BRT as an emerging and innovative approach to transportation. The report concludes that "BRT systems can have lower capital costs than light rail systems, yet can often provide similar performance."

FTA scrutiny of travel demand forecasting procedures and advancements in the state of the art, before and after comparisons of ridership for more recent projects such as those in Salt Lake City, St. Louis, Portland, Dallas, Boston and other cities have shown that ridership forecasts on these projects have been close to or have even slightly underestimated the ridership actually achieved.

37. **Transit ridership forecasts also tend to be overly optimistic. The U.S. DOT found that actual ridership was 28% to 85% lower than forecast ridership. On average, actual ridership was 65% lower than the forecast ridership.**

**Response:** See response to comment #36.

38. **Careful planning and thoughtful analyses are needed to avoid the mistakes of the past. At the same time, fundamental determinants of transportation dynamics, such as energy costs, work patterns, and population demographics and distribution are subject to change, often in unexpected and rapid ways. Lacking prescience, our best alternative is to envision a preferred future, and invest in ways that facilitate rather than preclude innovation.**

**Response:** The analyses methods incorporate official procedures and data and accepted practices for transportation projects.

39. **The SDEIS contains a tremendous amount of information, much of it well organized and clearly written. However, it also falls seriously short of the comprehensive planning document needed to inspire the vision of a preferred future for transportation on Oahu.**

**Response:** The OMPO TOP 2025 is the comprehensive transportation planning document. What we have presented is a significant enhancement to the public transportation mode. The SDEIS and FEIS present the Primary Corridor Transportation Project and associated alternatives analyzed, costs, plus social, economic, and environmental benefits and impacts.

#### Part B - MIS/DEIS Comments

40. **Our reviewers felt that there was insufficient consideration of alternatives. Specifically, additional alternatives were not adequately sought-out, initial alternatives such as the light rapid-transit alternative were eliminated prematurely, and additional alignments and siting for automated, grade-separated people-mover systems could have been further studied.**

**Response:** Substantial effort on the part of the public and stakeholders was spent in developing and analyzing a wide array of alternatives. The MIS/DEIS and FEIS, Chapter 2 summarize all the alternatives that were considered. The analyses were done in iterative fashion so that the majority

of the analyses could be spent on viable alternatives, rather than continuing to analyze alternatives that did not satisfy the project's purpose and need. Once it became clear from the analyses that an alternative was fatally flawed and with public input and City Council concurrence it was dropped from further consideration.

41. **In addition to the No Build, Transportation System Management (TSM), and Bus Rapid Transit (BRT) alternatives, the City should have included a rail alternative. The logic and justification for excluding the fixed rail option is not adequately described. It is not clear why a grade-separated, automated system - using technology similar to Vancouver's system or various Airport People Movers - was not included for analysis. Based on the information furnished in Section 2.6.2 (Alternatives Considered and Eliminated), it appears that there are distinct advantages of grade separation and automation. The problems seem less to do with the technology, per se, than with routing, siting, visual obstructions, and other factors.**

**Response:** A totally grade separated transit system does have distinct advantages; however, a totally grade separated system was rejected in 1992 due to financing. The early public outreach process for the PCTP reaffirmed the public's and policy makers' unwillingness to increase taxes to upgrade the public transportation system and alternatives were developed accordingly. (See City Council Resolution Number 99-338.)

The Refined LPA achieves many of the benefits of a totally grade separated system at a substantially less cost and with fewer environmental impacts. The Regional BRT is a grade-separated system. It utilizes the grade separated H-1 freeway rather than creating a totally new viaduct. In so doing it not only saves capital costs, but avoids displacements needed for new right-of-way, and has the added advantage of allowing the rubber tired buses that use the zipper lanes to collect and distribute passengers off of the freeway as well.

42. **Automation, moreover, offers clear advantages in terms of controlling labor costs and providing more flexible, more demand responsive service. To eliminate this technology simply because it failed to garner the necessary support in the past - seems to be a somewhat hasty decision. There was a tremendous amount of information and knowledge gained during the past efforts to implement such a system. That experience could be easily included, updated, and presented in this document. Moreover, the concern on the part of the past was related to cost and visual obstruction. A more detailed analysis of total costs, including the difference in operating costs for an automated, grade-separated system and the proposed BRT alternative would provide instructive.**

**Response:** There can indeed be operating cost savings with an automated, grade-separated transit system, but not necessarily. Also, to say that an automated, grade-separated system is more flexible and demand responsive than an at grade bus system is incorrect. A surface bus system has the flexibility of deploying buses anywhere along the system wide network to meet variable demand. An automated, grade-separated system cannot deviate from its fixed alignment.

The automated, grade-separated transit system was presented to the public and stakeholders at the beginning of the PCTP project. The public and stakeholders rejected this type of system based on costs, visual impacts, and displacements.

43. **In any case, the Environmental Impact Statement (EIS) is required to describe in a separate and distinct section alternatives which could attain the objectives of action, regardless of cost, in sufficient detail to explain why they were rejected" (Hawaii Administrative Rules 11-200-17(f)).**



**Response:** The Hawaii Administrative Rules 11-200-17(f) state: "The draft EIS shall describe in a separate and distinct section alternatives which could attain the objectives of the action, regardless of cost, in sufficient detail to explain why they were rejected. The section shall include a rigorous exploration and objective evaluation of the environmental impacts of all such alternative actions. Particular attention shall be given to alternatives that might enhance environmental quality or avoid, reduce, or minimize some or all of the adverse environmental effects, costs, and risks."

Examples of alternatives include:

- (1) The alternative of no action;
- (2) Alternatives requiring actions of a significantly different nature which would provide similar benefits with different environmental impacts;
- (3) Alternatives related to different designs or details of the proposed actions which would present different environmental impacts;
- (4) The alternative of postponing action pending further study; and,
- (5) Alternative locations for the proposed project.

In each case, the analysis shall be sufficiently detailed to allow the comparative evaluation of the environmental benefits, costs, and risks of the proposed action and each reasonable alternative. For any agency actions, the discussion of alternatives shall include, where relevant, those alternatives not within the existing authority of the agency."

As discussed in the DEIS, SDEIS, and FEIS Chapters 2, three alternatives were evaluated: the No-Build, Transportation System Management, and Bus Rapid Transit. Chapter 2 also includes a section regarding those alternatives that were considered but eliminated because they did not fulfil the project's purpose and need.

44. *The MIS/DEIS failed to realize the positive aspects of automobile-based transport and should have explored such dimensions. For this reason alone, a major mass transit system expansion will fail to produce sufficient benefits in the absence of a major economic or fuel crisis. A sample of some research on the efficiency, effectiveness, and desirability of automobile-based transport is offered below.*

**Response:** The MIS/DEIS, SDEIS, and FEIS rely upon travel demand forecasting models that are based on extensive surveys of actual travel behavior by Honolulu residents and visitors. These models use the documented behavior to forecast future travel demand and mode usage through simulation of the relative travel times and costs for various types of trips. The reasons people use autos or transit are fully accounted for in the forecasting process. That is why such a high percentage of auto use is shown to continue in the future with any form of transit.

(a) *"The stereotypes suggest that for most commuters the trek by car to work is a miserable bore, especially when the roads are congested... Our research clearly indicates that people like to travel by car. And they do so for many reasons that may have nothing to do with practical considerations like getting to work or gathering provisions... Some people find their commute time creates a much-needed transition, or buffer between their states of mind at work and home." (Mokhtarian and Salomon, University of California Transportation Center, 1999.)*

**Response:** We agree that some people like to travel by car. The Refined LPA will provide a transportation alternative to the automobile, not replace it.

(b.) *"In a recent survey of lower-skilled workers in the Detroit area, researchers analyzed the job-search behavior of unemployed workers, finding large differences between the patterns of those who owned cars compared with those who did not. Those with cars searched for work over a wider area and range of neighborhoods... An analysis of program attrition was conducted by the Manpower Demonstration Research Corporation. The DMRC report concluded that auto ownership was an important prerequisite to participation in the program, to completion of the job-training and ultimately to getting jobs." (O'Regan and Quigley, University of California Transportation Center, 1998)*

**Response:** Car ownership is one of the key factors included in the travel demand forecasting procedures.

(c.) *"In 1980 the U.S. Department of Energy found that automobiles used an average of 4,782 BTU of energy per passenger per mile - 1.7 times more than buses and 1.6 times more than rail. But by 1993 the average auto consumed only 3,593 BTU per passenger mile. Compare this with buses, which used 4,374 BTU per passenger mile, and rail, at 3,667 BTU per passenger mile." (Sarmiento, University of California Transportation Center, 1996)*

**Response:** We agree that automobiles are becoming more energy efficient as a result of federal mandates. In reviewing the Transportation Energy Data Book: Edition 21, October 2001, Table 2.10 presents the passenger travel and energy use in the United States for 1999. Although the BTU per passenger-mile for automobiles was 3,635 in 1999, automobiles used 9,126.1 trillion BTU. Personal trucks had a 4,511 BTU per passenger-mile and used 4,701.7 trillion BTU in 1999. Transit buses had a 4,802 BTU per passenger-mile in 1999 and accounted for 97.7 trillion BTU and rail (intercity, transit, and commuter) had a BTU per passenger-mile ranging from 2,932 to 3,063 and accounted for 86.6 trillion BTU in 1999.

(d.) *"National debate is unfolding about transportation policy in the context of environment, life-style and economic growth... Neither political nor public will exists to support policies, regardless of their environmental benefits, that involve significant sacrifice or depart radically from the status quo." (Dean and Skinner, Transportation Research Board, 1994)*

**Response:** We do not know the intent of the above quote; however, the Honolulu City Council supports the proposed project. On December 1, 1999, the full City Council adopted Resolution Number 99-338, strongly supporting the concepts of a high capacity frequent service transit system. On November 28, 2000 the City Council passed Resolution Number 00-249 selecting the BRT as the locally preferred alternative (LPA). On August 1, 2001, the City Council passed Resolution Number 01-208 amending the BRT LPA to include the Kakako Makai alignment. In June 2002, the City Council passed Bill 20 which is the FY 2003 Capital Improvement Budget and it included \$31 million for the In-Town BRT section between Iwalei and Waikiki. Also in June 2002, Bill 34 was passed which amended the Primary Urban Center Public Facilities Map to include the In-Town BRT Section between Iwalei and Waikiki.

45. *There should be no BRT east of the Central Business District (Downtown). A bus-exclusive TSM system using hybrid buses that reduce noise and pollution could run on exclusive lanes on King and Berea in the East-West direction and on University Avenue on the North-South direction*

including an exclusive bridge to Waikiki. Private circulators (we have several existing ones) between Waikiki and the Convention Center, Ala Moana, Aloha Tower, Inland and the airport should be encouraged.

**Response:** What is referred to as the TSM is similar to the In-Town BRT. The principal difference is that the In-Town BRT will operate on King and Keolu (not King and Barakia) to serve more trip generators. Private circulators will still be operating between Waikiki and the Convention Center, Ala Moana, Aloha Tower, Inland and the airport. A new bridge crossing the Ala Wai Canal to Waikiki has been proposed many times in the past and rejected by the community.

46. Incentives should also be given for the acquisition of quieter and cleaner emission vehicles by private companies.

**Response:** The federal government does offer tax incentives for cleaner, more fuel efficient vehicles.

47. Table 1.2-8 presents some important numbers. Although the urban core shows as having the largest demand for trips, most of them require extremely dense bus routes in order to be covered. The BRT will do little to serve these trips because of the large variety of purposes and destinations. BRT should focus on the leeward Oahu traffic which is expected to grow rapidly and already experiences a long and slow commute. If many of these trips to the urban core are removed, more local trips within the urban core can occur at reasonable levels of service.

**Response:** Three In-Town BRT branches (UH-Manoa, Kakaako, Makai, and Kakaako Mauka) are proposed to provide coverage in the urban core. In addition, the BRT system includes major regional components that serve travel demands from the Ewa plain, the Leeward Coast, and the Central Oahu areas. These regional BRT components interface directly with the In-Town BRT, encouraging the use of transit, not only for commuting, but also for travel throughout the day, within the urban core.

48. According to this EIS, the BRT would cut travel time from the University of Hawaii at Manoa (UHm) to downtown by half. However, the demand for students and faculty that take this trip is low. Most of the faculty and staff reside in Manoa and East Honolulu and most of the students reside in Leeward and Windward Oahu. A BRT connection to UHM is not needed.

**Response:** BRT service to UH-Manoa is needed because an analysis of the year 2025 Refined LPA home-based college transit trip table indicates that approximately 45 percent of travel related to UH-Manoa is attributed to Leeward and Central areas west of Kalia. Another 14 percent of UH-Manoa transit trips are connected to an area bounded by Kakaako and Kalia. Elements of Makiki and McCully would also benefit from the BRT and they comprise approximately nine percent of the UH-Manoa transit trips. Together, these transit trips constitute 68 percent of the UH-Manoa transit trips.

49. It was difficult to evaluate the quality of the travel demand forecasts and ridership estimates contained in the EIS due to a lack of information on methodology procedures and background data. Chapter 4 did not adequately describe the modeling procedures, the data used, the validity and reliability of the data the source of the data used for calibration, validation, and prediction. Information on trip generation, distribution, modal split, and network assignment is also lacking. Basic information such as trip tables, zone-to-zone analysis of population, employment, and trip-making behavior was not included. Integration of vehicle, transit, pedestrian, and bicycling data in

the modeling process presents special methodological challenges which should be described more fully. The EIS should contain a more detailed discussion on the modeling procedures and provide basic data so that the forecasting procedure can be evaluated.

**Response:** The FEIS Chapter 4 includes a description of the travel demand model used for the Primary Corridor Transportation Project analysis. This description provides an overview of the travel demand model. Since the OMPO Regional Travel Demand Model is being used, the FEIS refers interested readers to OMPO for a more detailed description of the model.

50. One example of where methodological would have been helpful include on page 4-10 where section 4.2.1 states that "The travel demand model used in this MIS/DEIS assumes demand spreading over a wide peak period so rescheduling is already accounted for." Is this a capacity-restrained spreading or was it done based on behavioral principles? Which ones? For instance, we know that flexible and similar plans have largely failed in Honolulu because although several employers allow flextime, school-children have fixed start times which, in-turn, defines a family's departure time, mode choice and route. How were real constraints such as this one accounted for?

**Response:** The demand spreading was incorporated into the OMPO model as part of the validation process. The Primary Corridor Transportation Project made no modifications to this.

The OMPO model is based on detailed travel behavior data collected through travel diaries kept by entire families. These data included adjustments in schedule and mode of travel based on needs such as dropping children at school. It is this linked trip behavior that drove the design of the OMPO model trip purposes.

51. Honolulu is quite unique in many respects including travel. For example, many people have multiple jobs, the majority of students are commuters and part-timers, there is no school bus service which, in turn, generates an unusually large number of drop-off/pick-up trips. Did the model account for all these facts? If so, how was a 61% increase in past transit ridership from 1997 to 2025 forecast? How much did ridership of TheBus increase in the 6 months that gasoline price increased by 60%?

**Response:** The data used to develop the OMPO Travel Demand Model reflects these unique characteristics. Detailed travel diaries documented the travel characteristics of Oahu families and largely drove the formulation of the model. As a result, the OMPO Travel Demand Model has 11 trip purposes instead of the more traditional four to five trip purposes. Four of the trip purposes are dedicated to characterizing the linked nature of journey to work trips. This model form acknowledges that a significant number of trips are not made directly between home and work but includes intermediate stops (drop children off, stop at cleaners on way to work, etc.). These data were used in formulating the trip generation, trip distribution, and mode choice elements of the model. The choice of transit as a mode of travel depends on a variety of factors, of which auto operating cost (gasoline price is a component of this) is one. Parking cost, travel time, and other factors also affect mode choice.

52. Delays due to construction have not been accounted for. There have been several studies on this subject, some of which estimated that several heavy-construction transportation projects created such congestion during construction that their delay-reduction benefits would not be able to balance construction delays for 10 to 30 years.

**Response:** Construction impacts are discussed in the FEIS Section 5.12. There will be traffic delays attributable to construction. Best practice techniques for mitigating these delays will be implemented in coordination with the Hawaii Department of Transportation and the communities affected. The alternative is to do nothing, which the public has indicated in numerous meetings is unacceptable.

53. *It is difficult to accept the LOS in Table 1.2-11 as credible. The results are likely and one can easily arrive at them by multiplying existing traffic levels with a busy growth factor. However, the fact is that congestion is self-limiting: people find ways around it without changing travel mode from automobile to mass transit. Time and again, history has shown that new transit services typically cannibalize existing transit services and carpools and fail to attract family car pools and solo-riding motorists who consist the supermajority of the commuters.*

**Response:** Table 1.2-11 compares the projected results of the year 2025 No-Build Alternative to existing conditions. The No-Build Alternative projects conditions that would occur if existing travel behavior and trends were to continue into the future. Given projected increases in travel demand, traffic congestion would increase. Observations of transportation corridors today would confirm that this congestion is not self-limiting.

Even if the No-Build Alternative continues existing travel trends, the traffic congestion that is projected results in increased transit ridership. The Refined LPA provides a more comprehensive transit alternative that give travelers an alternative to the auto mode and the projected ridership reflects its enhanced utility.

54. *The estimated delay per vehicle for the year 2025, are questionable (Table 4.2-2). Vehicular delay will skyrocket on arterials from which 1 to 3 lanes were taken away if realistic assumptions in BRT ridership are used.  
No build = 12.3 minutes  
TSM -> 11.6 minutes  
BRT = 12.1 minutes  
The study must present the reader with current numbers (or numbers from the recent past) so that proper associations can be made using a base with which the reader is familiar with (and is reliable compared to forecasts). This applies to most of the estimates presented throughout the report.*

**Response:** Table 4.2.2 in the MIS/DEIS presented an islandwide measure of vehicle hours of delay to assist in comparing the three alternatives analyzed. In the FEIS to present more detail analysis focusing on the locally preferred alternative (LPA) - the Refined LPA, vehicle delay is shown at the intersection level in Tables 4.4-5, 4.4-8, 4.4-9, 4.4-10, 4.4-11, 4.4-12, and 4.4-13.

55. *The study does not adequately describe transit safety issues regarding collisions with other motor vehicles and pedestrians. The primary focus of the study consisted of details such as sealing and comfort level, but there was no discussion of safety issues for pedestrians, bicyclists, and other motorists. A traffic safety section should be adequately developed.*

**Response:** Safety is very important and was a major consideration during the preliminary design of the BRT related facilities. Please see FEIS sections 5.3.4 and 5.12.4. Where priority lanes are proposed, special markings and pavement treatments are proposed to alert motorists, pedestrians and bicyclists of the presence of BRT buses. Safety railings and impact barriers are shown on the station prototype drawings in Appendix B for the protection of waiting passengers at median island platforms. Access to these median platforms is consistently shown via a crosswalk

at a signalized intersection. Where contra-flow lanes are proposed, warning devices will be installed at each intersection and driveway along that section of alignment. Extra wide curb lanes (a minimum of 14-feet) are proposed wherever the BRT will be sharing the lane with bicyclists.

56. *The EIS does not adequately describe energy impacts such as the cost of fuel and other uncertainties that could affect transportation in the urban core. While there is a comparison of energy consumption among the different alternatives, there should be more discussion of the impacts of changing oil prices on each of the alternatives, and how that would affect relative ridership.*

**Response:** It is beyond the scope of the EIS to analyze the impacts associated with fuel costs and other uncertainties that could affect transportation in the urban core.

57. *The section on Environmental Justice (as defined by Title VI) is inadequate. There should be a more complete discussion of the impacts of the project on minorities, low income households, persons with disabilities, and other groups. In addition to examining the increase in opportunities for disadvantaged groups, there should be a more detailed discussion of the extent to which environmental impacts - including pollution, noise, congestion, safety, and others - affect certain neighborhoods or population groups according to the alternatives considered. The report should summarize performance measures for each of the alternatives and their impacts on population subgroups.*

**Response:** Environmental Justice (EJ) populations were identified in proximity to the project. Disproportionate impacts to EJ populations are not anticipated. This analysis considered air quality, noise, traffic safety and hazardous materials impacts.

We will send you four copies of the Final Environmental Impact Statement under separate cover. We appreciate your interest in the project.

Sincerely,

  
CHERYL D. SOON  
Director



**Final Environmental Impact Statement**

**Primary Corridor Transportation Project**

**Chapter 7.0**

**Comments and Responses  
City & County Departments**



BOARD OF WATER SUPPLY  
CITY AND COUNTY OF HONOLULU  
630 SOUTH BERETANIA STREET  
HONOLULU, HI 96843



September 12, 2000

JEREMY HARRIS, Mayor  
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CHARLES A. STEL, Vice-Chairman  
JAN HALL, At-Large  
ROBERT K. KAOPOA, SR.  
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KAZUHIKUNO, Ex-Officio  
ROSS S. SAKUMURA, Ex-Officio  
CLIFFORD S. JAMILE  
Manager and Chief Engineer

TO: MS. CHERYL D. SOON, DIRECTOR  
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: FOR CLIFFORD S. JAMILE

SUBJECT: YOUR TRANSMITTAL OF AUGUST 21, 2000 REGARDING THE  
MAJOR INVESTMENT STUDY/DRAFT ENVIRONMENTAL IMPACT  
STATEMENT FOR THE PRIMARY CORRIDOR TRANSPORTATION PROJECT

Thank you for the opportunity to review and comment on the Major Investment Study/Draft Environmental Impact Statement for the Primary Corridor Transportation project.

Our previous comments on the Environmental Impact Statement Preparation Notice are still applicable and included in Appendix C of the document.

If you have any questions, please contact Scot Murooka at 527-5221.

cc: Office of Environmental Quality Control  
Robert Braman, Parsons Brinckerhoff Quade and Douglas

BOARD OF WATER SUPPLY  
CITY AND COUNTY OF HONOLULU  
630 SOUTH BERETANIA STREET  
HONOLULU, HI 96843



May 12, 1999

99 MAY 24 AM 02

JEREMY HARRIS, Mayor  
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ROBERT K. KAOPOA, SR.  
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ROSS S. SAKUMURA, Ex-Officio  
CLIFFORD S. JAMILE  
Manager and Chief Engineer

TO: MS. CHERYL D. SOON, DIRECTOR  
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: CLIFFORD S. JAMILE

SUBJECT: YOUR TRANSMITTAL OF APRIL 21, 1999 REGARDING THE  
ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE  
FOR THE PRIMARY CORRIDOR TRANSPORTATION PROJECT

Thank you for the opportunity to review and comment on the Environmental Impact Statement Preparation Notice (EISP) for the proposed primary corridor transportation project.

We have no objections to the proposed transportation improvements in the primary transportation corridor of Oahu. The construction plan should be submitted for our review and approval. We request further comments will be submitted by improvement plan on formalized.

If you have any questions, please contact Barry Langens at 527-5221.

Office of Environmental Quality Control

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

August 16, 2000

7703/99-02418



BOARD OF WATER SUPPLY  
CITY AND COUNTY OF HONOLULU  
630 SOUTH BERETANIA STREET  
HONOLULU, HI 96843

TO: RANDALL K. FUJIKI, DIRECTOR  
DEPARTMENT OF PLANNING AND PERMITTING

FROM: CHERYL D. SOON, DIRECTOR  
DEPARTMENT OF TRANSPORTATION SERVICES

SUBJECT: PRIMARY CORRIDOR TRANSPORTATION PROJECT

Thank you for the memorandum dated May 26, 1999 from Ms. Jan Kasei regarding the Environmental Impact Statement (EIS) Preparation Notice, Primary Corridor Transportation Project.

The comments are appreciated and will be included in the Major Investment Study/Draft Environmental Impact Statement. Enclosed is a copy of the written comments, which have been numbered. The following response is provided:

1. Project alternatives are discussed in detail in Chapter 2.

Should you have any questions regarding the project, please contact Kenneth Hanayama at 527-4978.

CHERYL D. SOON

cc: Person Brinckerhoff Quade & Douglas, Inc.

**BOARD OF WATER SUPPLY**  
CITY AND COUNTY OF HONOLULU  
830 SOUTH BERETANIA STREET  
HONOLULU, HI 96813



**APR 26 2002**

April 23, 2002

JEREMY HARRIS, Mayor  
EDDIE FLORES, Jr., Chairman  
CHARLES A. SITO, Vice-Chairman  
JAN MULLY, AMB  
HERBERT E.K. KAOPUA, SR.  
BRIAN K. MINNAI, E-ONES  
ROSS E. ELLIAMS, E-ONES  
CLIFFORD S. JAMILE  
Manager and Chief Engineer

TO: CHERYL D. SOON, DIRECTOR  
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: *K. Soon* CLIFFORD S. JAMILE, MANAGER AND CHIEF ENGINEER

SUBJECT: YOUR LETTER OF MARCH 13, 2002 ON THE SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE PRIMARY CORRIDOR TRANSPORTATION PROJECT

Thank you for the opportunity to review the subject document for the proposed improvements in Oahu's primary transportation corridor.

The construction drawing should be submitted for our review and approval.

The Board of Water Supply is open to meeting with you to discuss any possible conflicts in construction scheduling.

If you have any questions, please contact Joseph Kaakua at 527-6123.

cc: Genevieve Salmonson, Office of Environmental Quality Control

Pure Water... our greatest wealth - now it's a lifestyle

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU  
830 SOUTH KING STREET, 3RD FLOOR  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE "NEKO" MATAMOTO  
COUNTY DIRECTOR

November 13, 2002

TPD900-0441BR  
TPD/02-01646R

MEMORANDUM

TO: CLIFFORD S. JAMILE, MANAGER AND CHIEF ENGINEER  
BOARD OF WATER SUPPLY

FROM: CHERYL D. SOON, DIRECTOR

SUBJECT: PRIMARY CORRIDOR TRANSPORTATION PROJECT

This is in response to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your September 12, 2000 letter, which referred us to your May 13, 1999 letter regarding the MIS/DEIS. Part B responds to your April 23, 2002 letter regarding the SDEIS.

Part A - MIS/DEIS Comment

1. We have no objections to the proposed transportation improvements in the primary transportation corridor of Oahu. The construction plans should be submitted for our review and approval. We reserve further comment until the infrastructure improvement plans are formalized.

Response: Final engineering drawings will be sent for review and approval when ready. In the meantime, coordination meetings with your have been held and will continue throughout project development.

Part B - SDEIS Comments

2. The construction drawing should be submitted for our review and approval.  
Response: We will coordinate with you during final design and submit the drawings for review and approval.
3. The Board of Water Supply is open to meeting with you to discuss any possible conflicts in construction scheduling.  
Response: We will coordinate with you during final design to discuss possible construction scheduling conflicts.

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

*Cheryl D. Soon*  
CHERYL D. SOON



DEPARTMENT OF DESIGN AND CONSTRUCTION  
CITY AND COUNTY OF HONOLULU  
409 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
PHONE: (808) 523-4328 • FAX: (808) 523-4170 • Internet: www.cd.honolulu.hi.us



JEFFREY HARRIS  
MAYOR

May 7, 2002

MEMORANDUM

TO: CHERYL D. SOON, DIRECTOR  
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: RAE M. LOUI, P.E., DIRECTOR  
DEPARTMENT OF DESIGN AND CONSTRUCTION

SUBJECT: PRIMARY CORRIDOR TRANSPORTATION PROJECT,  
SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT (SEIS)

Thank you for the opportunity to review and provide comments to the SEIS document for the subject project. We would like to coordinate our construction projects with the BRT to minimize impacts to pedestrian and vehicular facilities, funding, drainage, and underground utilities and infrastructure. We expect that the scheduled May 20, 2002 meeting with your departmental staff and consultants will help this coordination along with clarifying the system technology alternatives, the proposed BRT alignment, exclusive travel lane and mixed traffic operation of the proposed BRT system on existing City streets, and the configuration and functional elements of the BRT transit stations.

If there are any questions, please contact me at 523-4564.

GS:dk

cc: Ms. Genevieve Salmonson, Director, OEQC

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 523-4328 • Fax: (808) 523-4170 • Internet: www.cd.honolulu.hi.us



JEFFREY HARRIS  
MAYOR

November 13, 2002

TPD502-01843R

MEMORANDUM

TO: RAE M. LOUI, P.E., DIRECTOR  
DEPARTMENT OF DESIGN AND CONSTRUCTION

FROM: CHERYL D. SOON, DIRECTOR

SUBJECT: PRIMARY CORRIDOR TRANSPORTATION PROJECT

This is in response to your May 7, 2002 letter regarding your comment on the Supplemental Draft Environmental Impact Statement (SEIS).

We would like to coordinate our construction projects with the BRT to minimize impacts to pedestrian and vehicular facilities, funding, drainage, and underground utilities and infrastructure.

Response: Close coordination will be maintained with all projects being constructed by DDC. Design and construction schedules will be provided for review and comment by DDC, and construction activities will be coordinated to minimize inconvenience to the public.

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

CHERYL D. SOON

DEPARTMENT OF ENVIRONMENTAL SERVICES  
CITY AND COUNTY OF HONOLULU  
600 SOUTH KING STREET, 3RD FLOOR • HONOLULU, HAWAII 96813  
PHONE: (808) 527-6863 • FAX: (808) 527-6875 • Website: www.cc.honolulu.hi.us



DEPUTY MAYOR  
Mayor

EDMUND E. SPRAGUE, P.E., P.L.C.  
Mayor  
MARKY NICHOLAS  
Deputy Mayor  
ENV 00-73

JEREMY HARRIS  
Mayor

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU  
600 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 523-4528 • Fax: (808) 523-4700 • Website: www.cc.honolulu.hi.us



CHERYL D. SOON  
Director  
GEORGE "KEOKI" MATAMOTO  
Deputy Director

TPD800-04349R

November 13, 2002

MEMORANDUM

TO: MS CHERYL D. SOON, DIRECTOR  
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: KENNETH E. SPRAGUE, DIRECTOR  
DEPARTMENT OF ENVIRONMENTAL SERVICES

SUBJECT: DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)  
PRIMARY CORRIDOR TRANSPORTATION PROJECT  
TAK: VARIOUS

We have reviewed the subject DEIS and have no comments to offer at this time.  
Should you have any questions, please contact Alex Ho at 523-4150.

cc: SOH - OEQC  
Parsons Brinckerhoff Quade and Douglas, Inc. - Mr. Robert Bramen

MEMORANDUM

TO: TIM STEINBERGER, P. E., DIRECTOR  
DEPARTMENT OF ENVIRONMENTAL SERVICES

FROM: CHERYL D. SOON, DIRECTOR

SUBJECT: PRIMARY CORRIDOR TRANSPORTATION PROJECT

This is in response to your department's September 7, 2000 letter regarding the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) which stated that you had no comments. We appreciate you taking the time to review the MIS/DEIS:

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

CHERYL D. SOON



DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
 PACIFIC PAPER PLAZA • 711 KAPOLANI BOULEVARD, 15TH FLOOR, HONOLULU, HAWAII 96813  
 PHONE: (808) 523-4329 • FAX: (808) 523-4730 • INTERNET: WWW.CO.HONOLULU.HI.US



25 4 34 PM '00

JEREMY HARRIS  
 MAYOR

CHERYL D. SOON  
 DIRECTOR  
 JOSEPH N. MAGALAO, JR.  
 DEPUTY DIRECTOR

August 23, 2000

TPD00-00418

Dear Participant:

Attached for your review is a Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) which was prepared pursuant to the National Environmental Policy Act (42 U.S.C. 4332), EIS law (Hawaii Revised Statutes, Chapter 343) and the EIS rules (Administrative Rules, Title 11, Chapter 200).

TITLE OF PROJECT: Primary Corridor Transportation Project

LOCATION: ISLAND OAHU DISTRICT East Honolulu

TAX MAP KEY NUMBERS: Various

AGENCY ACTION: 1 APPLICANT ACTION: \_\_\_\_\_

YOUR COMMENTS MUST BE RECEIVED OR POSTMARKED BY: NOVEMBER 6, 2000

In accordance with the provisions of Chapter 343, HRS, the DEQC Environmental Notice will list an October 23, 2000 deadline for comments. This is the minimum 45-day comment period. However, the proposing agency has agreed to consider and respond to any comments received or postmarked by November 6, 2000.

PLEASE SEND ORIGINAL COMMENTS TO:

PROPOSING AGENCY: City and County of Honolulu  
Department of Transportation Services  
711 Kapiolani Boulevard, Suite 1100  
Honolulu, Hawaii 96813

CONTACT: Cheryl D. Soon, Director PHONE: (808) 523-4121

COPIES OF THE COMMENTS SHOULD BE SENT TO THE FOLLOWING:

ACCEPTING AUTHORITY: Governor, State of Hawaii  
600 Office of Environmental Quality Control  
233 S. Beretania Street, Suite 202  
Honolulu, Hawaii 96813

CONTACT: \_\_\_\_\_ PHONE: (808) 516-4183

CONSULTANT: Parsons Brinckerhoff O'Connell and Deutels, Inc.  
Pacific Tower, Suite 1000  
1001 Bishop Street  
Honolulu, Hawaii 96813

CONTACT: Robert Blazyn, Project Manager PHONE: (808) 531-7094

If you no longer need this EIS, please recycle it. Thank you for your participation in the EIS process!

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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 HONOLULU, HAWAII 96813  
 Phone: (808) 523-4329 • Fax: (808) 523-4730 • Internet: WWW.CO.HONOLULU.HI.US



JEREMY HARRIS  
 MAYOR

CHERYL D. SOON  
 DIRECTOR  
 GEORGE KECORU  
 DEPUTY DIRECTOR

November 13, 2002

TPD1100-05388R

MEMORANDUM

TO: LARRY J. LEOPARDI, P.E., DIRECTOR  
 DEPARTMENT OF FACILITY MAINTENANCE

FROM: CHERYL D. SOON, DIRECTOR

SUBJECT: PRIMARY CORRIDOR TRANSPORTATION PROJECT

Thank you for your department's August 23, 2000 letter responding to the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS), which stated you had no comments. We appreciate your taking the time to review the MIS/DEIS.

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

*Cheryl D. Soon*  
 CHERYL D. SOON

DEPARTMENT OF PARKS AND RECREATION  
CITY AND COUNTY OF HONOLULU

610 SOUTH KING STREET, 10TH FLOOR • HONOLULU, HAWAII 96813  
PHONE: (808) 531-4112 • FAX: 531-4084

JEREMY HARRIS  
MAYOR



WILLIAM D. BALFOUR, JR.  
DIRECTOR

MICHAEL T. ALAN  
DEPUTY DIRECTOR

JEREMY HARRIS  
MAYOR



DEPARTMENT OF PARKS AND RECREATION  
CITY AND COUNTY OF HONOLULU

MAPLE HALL, 1000 LUAKOHA STREET, STE. 300 • MAPLE, HAWAII 96707  
PHONE: (808) 922-5582 • FAX: 922-5151 • INTERNET: WWW.DD.HONOLULU.HI.US

WILLIAM D. BALFOUR, JR.  
DIRECTOR

EDWARD T. "SHIPP" DIAZ  
DEPUTY DIRECTOR

September 14, 2000

TO: CHERYL D. SOON, DIRECTOR  
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: WILLIAM D. BALFOUR, JR., DIRECTOR

SUBJECT: MAJOR INVESTMENT STUDY  
DRAFT ENVIRONMENTAL IMPACT STATEMENT  
PRIMARY CORRIDOR TRANSPORTATION PROJECT

Thank you for the opportunity to review and comment on the Draft Environmental Impact Statement (EIS) relating to the Primary Corridor Transportation Project.

The Department of Parks and Recreation acknowledges that none of the proposed alternatives would require land from or cause proximity impacts to any existing park or recreational resource.

We request that our department continue to be included as a consulted party to the EIS process.

Should you have any questions, please contact Mr. John Reid, Planner, at 547-7396.

WDB:CU  
(89-311278)

cc: Governor, State of Hawaii  
Mr. Robert Bramen, Parsons Brinkerhoff Quade and Douglas, Inc.  
Mr. Don Griffin, Department of Design and Construction

*W.D. Balfour, Jr.*  
WILLIAM D. BALFOUR, JR.  
Director

April 2, 2002

MEMORANDUM

TO: CHERYL D. SOON, DIRECTOR  
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: WILLIAM D. BALFOUR, JR., DIRECTOR

SUBJECT: PRIMARY CORRIDOR TRANSPORTATION PROJECT  
SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT

Thank you for the opportunity to review and comment on the Supplemental Draft Environmental Statement relating to the Primary Corridor Transportation Project.

The Department of Parks and Recreation has no comment on the proposed refinements to the Bus Rapid Transit system.

Should you have any questions, please contact Mr. John Reid, Planner, at 692-5454.

WDB:je

cc: Ms. Genevieve Salmonson, Director  
Office of Environmental Quality Control  
Mr. Don Griffin, Department of Design and Construction

*W.D. Balfour, Jr.*  
WILLIAM D. BALFOUR, JR.  
Director

APR 3 12:48

DEPARTMENT OF PLANNING AND PERMITTING  
**CITY AND COUNTY OF HONOLULU**

650 SOUTH KING STREET - HONOLULU, HAWAII 96813  
 TELEPHONE: (808) 532-4313 • FAX: (808) 532-8743 • INTERNET: www.ci.honolulu.hi.us



RANDALL K. FUJIKI, AIA  
 DIRECTOR  
 LORRY K.C. CHOI  
 DEPUTY DIRECTOR

2000/CLOG-4728(RY)

November 16, 2000

MEMORANDUM

TO: CHERYL D. SOON, DIRECTOR  
 DEPARTMENT OF TRANSPORTATION SERVICES

FROM: RANDALL K. FUJIKI, AIA, DIRECTOR  
 DEPARTMENT OF PLANNING AND PERMITTING

SUBJECT: MAJOR INVESTMENT STUDY/DRAFT ENVIRONMENTAL IMPACT  
 STATEMENT (MISDEIS) FOR PRIMARY CORRIDOR TRANSPORTATION  
 PROJECT, EWA TO HONOLULU, OAHU

We support your efforts to address traffic congestion issues along the primary corridor and agree that there should be alternative means for contributing to improved mobility for Oahu's population. The alternative selected should be closely coordinated with proposed revisions to the Primary Urban Center and the Central Oahu Development Plan which are presently undergoing major revisions. We look forward to working closely with your staff on this, and offer the following comments for your consideration:

1. All three transportation alternatives presented (the No-Build; the Transportation System Management or "hub-and-spoke" system; and the Bus Rapid Transit Alternative) generally support the City's *General Plan* Transportation objectives and policies (Chapter V, Objective A).
2. A review of applicable Development Plan Public Facilities maps and Public Infrastructure maps indicates that some of the proposed facilities are not yet reflected for inclusion on said maps. Thus, facilities such as the transit centers, park & ride facilities, special facilities that involve roadway widening, and other major improvements not shown within the primary corridor, may be subject to requirements for amending the Primary Urban Center (PUC) and the Central Oahu Development Plan Public Facilities maps. In addition, proposed improvements not shown on the Ewa Development Plan Public

DEPARTMENT OF TRANSPORTATION SERVICES  
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CHERYL D. SOON  
 DIRECTOR  
 GEORGE "NEON" MIYAMOTO  
 DEPUTY DIRECTOR

TPD9/00-04508R  
 TPD4/02-01273R

November 13, 2002

MEMORANDUM

TO: WILLIAM D. BALFOUR, JR., DIRECTOR  
 DEPARTMENT OF PARKS AND RECREATION

FROM: CHERYL D. SOON, DIRECTOR

SUBJECT: PRIMARY CORRIDOR TRANSPORTATION PROJECT

This is in response to your comments regarding the Major Investment Study/Draft Environmental Impact Statement (MISDEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your September 14, 2000 letter regarding the MISDEIS, and Part B responds to your April 2, 2002 letter regarding the SDEIS.

Part A - MISDEIS Comments

1. The Department of Parks and Recreation acknowledges that none of the proposed alternatives would require land from or cause proximity impacts to any existing park or recreational resource.  
 Response: Thank you for taking the time to review the MISDEIS.
2. We request that our department continue to be included as a consulted party to the EIS process.  
 Response: DTS will continue to consult with the Department of Parks and Recreation.

Part B - SDEIS Comments

3. The Department of Parks and Recreation has no comment on the proposed refinements to the Bus Rapid Transit System

Response: Thank you for taking the time to review the SDEIS.

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

CHERYL D. SOON

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
630 SOUTH KING STREET, 3RD FLOOR  
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Phone: (808) 523-4329 • Fax: (808) 523-4730 • Internet: www.cc.honolulu.hi.us

JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE "KEONO" MIYAJI  
DEPUTY DIRECTOR



TPD11/00-05602R

November 13, 2002

MEMORANDUM

TO: LORETTA K. C. CHEE, ACTING DIRECTOR  
DEPARTMENT OF PLANNING AND PERMITTING

FROM: CHERYL D. SOON, DIRECTOR

SUBJECT: PRIMARY CORRIDOR TRANSPORTATION PROJECT

This is in response to your November 16, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. We support your efforts to address traffic congestion issues along the primary corridor and agree that there should be alternative means for contributing to improved mobility for Oahu's population. The alternative selected should be closely coordinated with proposed revisions to the Primary Urban Center and the Central Oahu Development Plan which are presently undergoing major revisions.

**Response:** As described in Section 5.1.3, Subsection 3, of the FEIS, "Consistency with Land Use Plans", the Refined LPA (BRT Alternative) was evaluated as being "highly consistent" with the policies and guidelines of the Central Oahu and Public Review Draft Primary Urban Center Development Plan updates. DTS will continue coordinating with the DPP throughout project development to insure that the project remains consistent with the plan updates.

2. All three transportation alternatives presented (the No-Build; the Transportation System Management or "hub-and-spoke" system; and the Bus Rapid Transit Alternative) generally support the City's General Plan Transportation objectives and policies (Chapter V, Objective A).

**Response:** Thank you for taking the time to review the MIS/DEIS.

3. A review of applicable Development Plan Public Facilities maps and Public Infrastructure maps indicates that some of the proposed facilities are not yet reflected for inclusion on said maps. Thus, facilities such as the transit centers, park-and-ride facilities, special facilities that involve roadway widening, and other major improvements not shown within the primary corridor, may be subject to requirements for amending the Primary Urban Center (PUC) and the Central Oahu Development Plan Public Facilities maps.

**Response:** The PUC Public Facilities Map has been revised to include the BRT section from Inlet to Waialae.

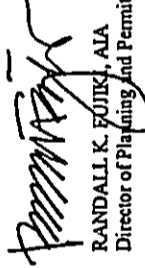
Cheryl D. Soon, Director  
Department of Transportation Services  
Page 2  
November 16, 2000

Infrastructure Map (PIM) will be subject to inclusions in the PIM for Ewa. These improvements include park & ride facilities, transit centers, and special ramps and other proposed roadway improvements if they involve road widening. However, the requirement for a Public Facilities Map amendment is subject to change as the PUC and Central Oahu Development Plans complete their revision processes.

3. On page 3-18, major Special Management Area (SMA) use permits are required for those developments that exceed a valuation of \$125,000, not \$150,000. With respect to Section 3.8.6, the City Council decides on major SMA permits and the Director of Planning and Permitting decides on minor SMA permits.
4. Regarding Section 3.8.3, development within flood plains must meet requirements relating to flood hazard district of Article 9 of the Land Use Ordinance.
5. On Figure 3.1-5F, any references to the R-2 Residential District should be replaced with references to the R-3.5 Residential District.
6. The portion of Auahi Street between Ward Avenue and Kamani Street is privately owned and maintained.
7. Since all possible locations of the proposed transit centers were not included in the DEIS, we assume that further discussion on these alternatives will be addressed in a separate document. This will facilitate participation by affected and interested community members and agencies can begin assessing the adequacy of existing and proposed support infrastructure.

Should you have any questions regarding the DPP comments, please contact Raymond Young of our Community Action Plans Branch at 527-5839.

Sincerely yours,

  
RANDALL K. FUJIKI, AIA  
Director of Planning And Permitting

RKF:lh  
cc: Robert Braumen, Parsons Brinkerhoff  
Quade and Douglas, Inc.  
Doc 40134

4. In addition, proposed improvements not shown on the Ewa Development Plan Public Infrastructure Map (PIM) will be subject to inclusions in the PIM for Ewa. These improvements include park-and-ride facilities, transit centers, and special ramps and other proposed roadway improvements if they involve road widening.  
Response: DTS concurs and will work with your department to insure that the project components are included on the Ewa PIM.
5. However, the requirement for a Public Facilities Map amendment is subject to change as the PUC and Central Oahu Development Plans complete their revision processes.  
Response: DTS concurs.
6. On page 3-18, major Special Management Area (SMA) use permits are required for those developments that exceed a valuation of \$125,000, not \$150,000.  
Response: Capital costs of major SMA permits have been corrected to \$125,000 in Sections 3.1.5 and 5.1.3 of the FEIS.
7. With respect to Section 3.8.6, the City Council decides on major SMA permits and the Director of Planning and Permitting decides on minor SMA permits.  
Response: The FEIS now recognizes the appropriate SMA permitting roles of the City Council and the Director of Planning and Permitting.
8. Regarding Section 5.8.3, development within the flood plains must meet requirements relating to flood hazard district of Article 9 of the Land Use Ordinance.  
Response: The comment states that developments within flood plains must be developed according to the Land Use Ordinance. The FEIS acknowledges that developments in flood plains must meet requirements for flood hazard districts as stated in the Land Use Ordinance.
9. On Figure 3.1-SF, any references to the R-2 Residential District should be replaced with references to the R-3.5 Residential District.  
Response: As requested, references to R-2 zoning districts have been changed to R-3.5 zoning districts.
10. The portion of Auahi Street between Ward Avenue and Kamehi Street is privately owned and maintained.  
Response: DTS is aware of Auahi Street's ownership and maintenance status. Coordination efforts are ongoing with the appropriate parties.
11. Since all possible locations of the proposed transit centers were not included in the DEIS, we assume that further discussion on these alternatives will be addressed in a separate document. This will facilitate participation by affected and interested community members and agencies can begin assessing the adequacy of existing and proposed support infrastructure.

Response: Impacts and mitigation measures associated with the Kapolei and North-South Road Transit Centers are discussed in the FEIS. The remaining transit centers will be developed with or without the Refined LPA and are independent projects. These independent projects will have the appropriate environmental documents prepared.

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

  
CHERYL D. SOON

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
PACIFIC PARK PLAZA • 711 KAPOLANI BOULEVARD, SUITE 1200 • HONOLULU, HAWAII 96813  
PHONE: (808) 522-3255 • FAX: (808) 523-4720



JOSEPH M. MALCOLM, JR.  
DEPUTY DIRECTOR

CHERYL D. SOON  
DIRECTOR

December 8, 2000

Cheryl D. Soon  
Director  
Department of Transportation Services  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813

Dear Mrs. Soon:

Subject: Primary Corridor Transportation Project

A presentation on the Primary Corridor Transportation Project was held for the Committee for Accessible Transportation (CAT) at its October 13, 2000 meeting. It was apparent that the City administration has placed great emphasis on the Bus Rapid Transit (BRT) alternative in order to improve public transportation in the affected areas. The CAT did not take a position on whether or not to endorse any of the three transit alternatives presented. However, the CAT recommends that the City address the following specific items related to access for persons with disabilities regardless of which alternative is ultimately selected:

- o All future public transit vehicles should feature accessibility that goes beyond the ADA minimum specification requirements with particular respect to:
  - o ingress and egress (including lift platform or ramp width, and aisle width between the fare box and opposing furniture), and
  - o turn around space for wheelchairs and scooters at the tie-down locations.

- o All future public transit vehicles should provide additional space for service animals where the animal is not placed in the path of passengers or in tie-down areas.

If the BRT becomes the chosen alternative, the CAT recommends that TheHandi-Van vehicles be permitted to utilize the dedicated BRT lanes to facilitate quicker travel times. This recommendation does not suggest that TheHandi-Van vehicles should utilize BRT passenger loading/unloading facilities.

Thank you for considering our perspective.

Sincerely,

TOM BATTY, Chair

HELEN MYERS, Vice Chair

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE SECOFF-ATAFUOTO  
DEPUTY DIRECTOR

Tom Baly  
Page 2  
November 13, 2002

**Response:** Sharing of BRT lanes by TheHandi-Van vehicles has merit and will be considered on a trial basis. If proven to not hinder the operations or safety of either the BRT or TheHandi-Van, then it will be implemented permanently.

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

MEMORANDUM

TO: TOM BATH, CHAIR  
COMMITTEE FOR ACCESSIBLE TRANSPORTATION

FROM: CHERYL D. SOON, DIRECTOR

SUBJECT: PRIMARY CORRIDOR TRANSPORTATION PROJECT

TPD1200-05695R

November 13, 2002

CHERYL D. SOON

This is in response to your December 8, 2000 letter regarding comments on the MIS/DEIS.

1. All future public transit vehicles should feature accessibility that goes beyond the ADA minimum specification requirements with particular respect to: a) ingress and egress (including lift platform or ramp width, and aisle width between the fare box and opposing furniture), and b) turn around space for wheelchairs and scooters at the tie-down locations.

**Response:** Design criteria used in preparing the preliminary engineering documents contained in the FEIS Appendix B reflected input from a coordination meeting with the DTS Committee for Accessible Transportation.

2. All future public transit vehicles should provide additional space for service animals where the animal is not placed in the path of passengers or in tie-down areas.

**Response:** Space allocations for elderly and disabled seating (and service animals), wheel chair provisions, and the design for egress in and out of the vehicle shall be reviewed with members of the DTS Committee for Accessible Transportation when finalizing the BRT bus design. The manufacturer will focus on the nature of these design elements and the adequacy of space for service animals in a crowded vehicle once the contract is awarded. This is the most efficient time to work out the seating lay-out and other dimensions critical to this issue.

In addition, the operator of the BRT service can further address this issue by: 1) providing signage to include service animals where there are provisions requesting that designated seating be made available for elderly and disabled patrons; and 2) Educating all bus operators in the accommodation of service animals by disabled persons via the educational training programs developed by the FTA Office of Civil Rights.

3. If the BRT becomes the chosen alternative, the Committee for Accessible Transportation recommends that TheHandi-Van vehicles be permitted to utilize the dedicated BRT lanes to facilitate quicker travel times. This recommendation does not suggest that TheHandi-Van vehicles should utilize BRT passenger loading/unloading facilities.

FIRE DEPARTMENT  
CITY AND COUNTY OF HONOLULU  
3375 KULANANA STREET, SUITE 1425 • HONOLULU, HAWAII 96819-1193  
TELEPHONE: (808) 831-7781 • FAX: (808) 831-7750 • HONOLULU, HAWAII



ATTILIO K. LEONARDI  
FIRE CHIEF  
JOHN CLARK  
DEPUTY FIRE CHIEF

March 21, 2002

TO: CHERYL D. SOON, DIRECTOR  
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: ATTILIO K. LEONARDI, FIRE CHIEF

SUBJECT: PRIMARY CORRIDOR TRANSPORTATION PROJECT  
SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT  
REFERENCE NO.: TPD02-00141

We received your memorandum dated March 13, 2002, regarding the above-mentioned project. The Honolulu Fire Department has no objections to any of the alternatives of the project, however, we request that the following be complied with:

1. Maintain fire apparatus access throughout the construction sites for the duration of the project.
2. Notify the Fire Communication Center at 523-4411 regarding any interruption in the existing fire hydrant system during the project.

Should you have any questions, please call Battalion Chief Kenneth Silva of our Fire Prevention Bureau at 831-7778.

*Attilio K. Leonard*  
ATTILIO K. LEONARDI  
Fire Chief

AKL/SK:ji

cc: Genevieve Salmonson, Director  
Office of Environmental Quality Control

FIRE DEPARTMENT  
CITY AND COUNTY OF HONOLULU  
3375 KULANANA STREET, SUITE 1425 • HONOLULU, HAWAII 96819-1193  
TELEPHONE: (808) 831-7781 • FAX: (808) 831-7750 • HONOLULU, HAWAII



ATTILIO K. LEONARDI  
FIRE CHIEF  
JOHN CLARK  
DEPUTY FIRE CHIEF

September 1, 2000

TO: CHERYL D. SOON, DIRECTOR  
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: ATTILIO K. LEONARDI, FIRE CHIEF

SUBJECT: PRIMARY CORRIDOR TRANSPORTATION PROJECT  
TPD00-00418

We received your memorandum dated August 23, 2000, regarding the subject project. The Honolulu Fire Department has no objections to any of the alternatives of the project, however, requests that the following are complied with:

1. Maintain fire apparatus access throughout the construction site for the duration of the project.
2. Notify the Fire Communication Center (523-4411) of any interruption in the existing fire hydrant system during the project.

Should you have any questions, please call Battalion Chief Kenneth Silva of our Fire Prevention Bureau at 831-7778.

*Attilio K. Leonard*  
ATTILIO K. LEONARDI  
Fire Chief

AKL/KS:jo

cc: Governor, State of Hawaii, c/o Office of Environmental Quality Control  
Robert Brannen, Parsons Brinckerhoff Quade and Douglas, Inc.



DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE YEGOROV-MITAMOTO  
SENIOR DIRECTOR

TPD900-04368R  
TPD302-01200R

November 13, 2002

MEMORANDUM

TO: ATTILIO K. LEONARDI, FIRE CHIEF  
FIRE DEPARTMENT

FROM: CHERYL D. SOON, DIRECTOR

SUBJECT: PRIMARY CORRIDOR TRANSPORTATION PROJECT

This is in response to your comments regarding the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Statement (SDEIS). We are responding in two parts. Part A responds to your September 1, 2000 letter regarding the MIS/DEIS, and Part B responds to your March 21, 2002 letter regarding the SDEIS.

Part A - MIS/DEIS Comments

1. Maintain fire apparatus access throughout the construction site for the duration of the project.  
Response: Access for fire apparatus will be maintained during project construction and operation.
2. Notify the Fire Communication Center (523-4411) of any interruption in the existing fire hydrant system during the project.  
Response: Thank you for this information. The Fire Communication Center will be notified of any anticipated interruption in the existing fire hydrant system.

Part B - SDEIS Comments

3. Maintain fire apparatus access throughout the construction sites for the duration of the project.  
Response: Project design will accommodate fire access requirements.
4. Notify the Fire Communication Center at 523-4411 regarding any interruption in the existing fire hydrant system during the project.  
Response: Project construction documents will include fire notification requirements.

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

CHERYL D. SOON

MAYOR'S ADVISORY COMMITTEE ON BICYCLING  
**CITY AND COUNTY OF HONOLULU**  
P.O. BOX 1500, 15TH FLOOR, SUITE 1500 • HONOLULU, HAWAII 96813  
PHONE: (808) 523-4730 • FAX: (808) 523-4730



JEREMY HARRIS  
MAYOR

November 6, 2000

Department of Transportation Services  
711 Kapiolani Blvd  
Suite 1200  
Honolulu, HI 96813

Draft EIS/DEIS for Primary Corridor Transportation Project

The Mayor's Advisory Committee on Bicycling has reviewed the Draft Environmental Impact Statement that was prepared for the City and County of Honolulu, Department of Transportation.

The City proposes semi-exclusive transit lanes and traffic signal improvements to give priority to buses and other transit vehicles during peak traffic hours on congested arterial streets. A policy would be established to allow bicycles to use the semi-exclusive curbside lanes where there is no adjacent bike lane or acceptable alternative route. Some key routes affected include segments of Ala Moana Boulevard, King and Bercutania Streets, Ward Avenue, Kapiolani Boulevard, University Avenue, Kalua/Saratoga, Nimitz Highway, Dillingham Boulevard, Kapolei Parkway, and Farrington Highway (Fort Barrette Road to Kunia Road).

The Committee supports the City's proposal to provide improved transit systems along the Primary Urban Corridor as it promotes alternative and environmentally friendly forms of transportation and reduces reliance on private automobiles. However, we offer the following comments as the plan affects bicycle and pedestrian facilities:

Proposed Action

A map of existing and proposed bikeways that will be affected should be added to the Final EIS. The map should locate bikeway segments and indicate measured distances that will be designated joint bus/bike use, proposed alternate bike routes, and new bike lanes. How many total feet of bicycle facilities will be affected? Bicycle path design should be in compliance with American Association of State Highway and Transportation Officials (AASHTO) codes and should follow the recommendations of the City's *Honolulu Bicycle Master Plan* (April 1999).

We fully support construction of additional bicycle parking and "staging" areas at transit centers and park and ride facilities to enhance bicycle travel in the Primary Corridor.

#### Safety

We support the City's proposal to provide safe alternative bicycle routes where the transitway interferes with the present pattern of bicycle travel. However, it is important to note that bicyclists are allowed to travel on and share City roadways. Bicyclists will continue to ride on those roadways most convenient to their needs. We would not support prohibiting bicyclists from riding on existing bicycle routes. We caution the City to carefully study alternative routes; avoid crossing main streets several times along a "detour," compromising safety and convenience. (Refer to the *Oregon Bike Plan*, which diagrams potential problems associated with detoured bike routes, at the website: [www.odot.state.or.us/techserv/bikewalk/planimg/principles.htm](http://www.odot.state.or.us/techserv/bikewalk/planimg/principles.htm))

The Draft EIS mentions that joint-use bus/bike lanes occur in other major cities, including Portland, Seattle, Madison, WI, New York, Toronto, San Francisco, and London. The American Association of Pedestrian and Bicycle Professionals (ph. 202-366-4071) gathered information from a variety of City Bicycle Coordinators regarding their experiences with shared bicycle, bus, and right-turn lanes. Items noted include:

- The preferred width for shared bus/bicycle lanes is 16 feet for heavily traveled routes. This allows a moving bus to pass a bicyclist without the bus drifting into the adjacent travel lane or forcing the bicyclist into the gutter. The City's proposed plan indicates 14-foot wide shared lanes. However, this is often an improvement over existing narrower lane widths.
- The City of Portland, Oregon produced a successful training video for instructing transit drivers the best methods of interacting with cyclists on roadways. We suggest that the City contact the Portland Bicycle Coordinator. Information can be found at the website: [www.trans.ci.portland.or.us/traffic\\_management/bicycle\\_program/](http://www.trans.ci.portland.or.us/traffic_management/bicycle_program/)
- Curbside transit lanes often fill up with motorists turning right, squeezing bicyclists out, and defeating the purpose of improved transit service. Constructing right-hand turn pockets would alleviate the problem in the most congested areas.
- In general, the cities that have implemented shared bus/bike lanes reported that commute conditions improved for buses and bikes compared to the No-Action scenario.

Traffic-calming methods would also improve safety for bicyclists and pedestrians along the transitways.

#### Consultations with Bicycling and Pedestrian Community

As noted in the EIS, the City must work with the community to refine bicycling and pedestrian components of the plan. Further details are yet to be worked out, including mapping locations of affected existing and future bikeways, design details, alternative bicycle routes, directional and safety signage, enforcement of the exclusive use lanes, and incentives to encourage public transit system use.

The Bicycling Committee offers our assistance to the Department of Transportation Services and their consultant, Parsons Brinkerhoff, on bicycle and pedestrian facility planning issues. Please contact our committee (ph. 521, 5361, Lisa Reinke) and groups such as the Hawaii Bicycling League (ph. 735-5756) to build widespread support among the potential users.

The project would provide alternative travel opportunities benefiting the community. We hope to see future details in the Final Environmental Assessment. Thank you for the opportunity to comment.

Sincerely,



Lisa W. Reinke  
Chair

cc: Office of Environmental Quality  
and Mr. David Atkin, Parsons Brinkerhoff

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**

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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE NEGOTI  
DEPUTY DIRECTOR

November 13, 2002

TPD11/00-05425R

MEMORANDUM

TO: LISA W. REINKE, CHAIR  
MAYOR'S ADVISORY COMMITTEE ON BICYCLING

FROM: CHERYL D. SOON, DIRECTOR

SUBJECT: PRIMARY CORRIDOR TRANSPORTATION PROJECT

This is in response to your November 6, 2000 letter regarding comments on the MIS/DEIS.

1. A map of existing and proposed bikeways that will be affected should be added to the Final EIS. The map should locate bikeway segments and indicate measured distances that will be designated for bus/bike use, proposed alternate bike routes, and new bike lanes.

Response: Figures 3.1-4A to 3.1-4C show existing and planned bikeway facilities in the project area. The Refined LPA will not displace any existing bikeway facility, such as bike lanes, paths, or routes. However, bike lanes on University Avenue would be moved next to the curb because on-street parking will be removed. To improve bicycling transportation under the Refined LPA, the Hawaii Bicycling League (HBL) was invited to participate in project planning. Where the In-Town BRT lane is curbside, cyclists would be allowed use of these lanes. Where the In-Town BRT lane is in the center of the street, the project would attempt to establish 14-foot-wide curbside bike lanes where not possible. In terms of future bikeway facilities, as identified in the Honolulu Bicycle Master Plan, the Refined LPA would not preclude any of the suggested projects. The HBL agreed that the Refined LPA would improve bicycle transportation within Honolulu.

2. How many total feet of bicycle facilities will be affected?

Response: As indicated in the response to comment #1, the proposed project will not displace existing or proposed bicycle facilities.

3. Bicycle path design should be in compliance with American Association of State Highway and Transportation Officials (AASHTO) codes and should follow the recommendations of the City's Honolulu Bicycle Master Plan (April 1999).

Response: The project does not include any proposed bike paths.

4. We fully support construction of additional bicycle parking and "staging" areas at transit centers and park and ride facilities to enhance bicycle travel in the Primary Corridor.

Response: Thank you for supporting this project component.

Lisa W. Reinke  
Page 2  
November 13, 2002

5. We support the City's proposal to provide safe alternative bicycle routes where the transitway interferes with the present pattern of bicycle travel. However, it is important to note that bicyclists are allowed to travel on and share City roadways. Bicyclists will continue to ride on these roadways most convenient to their needs. We would not support prohibiting bicyclists from riding on existing bicycle routes.

Response: See response to comment #1.

6. We caution the City to carefully study alternative routes; avoid crossing main streets several times along a "detour," compromising safety and convenience. (Refer to the Oregon Bike Plan which diagrams potential problems associated with detoured bike routes, at the website: [www.odot.state.or.us/techserv/bikewalk/planimg/principles.htm](http://www.odot.state.or.us/techserv/bikewalk/planimg/principles.htm)).

Response: The In-Town BRT will not require the detouring of any bike route. Cyclists will be allowed to use curbside BRT lanes.

7. The preferred width for shared bus/bicycle lanes is 16 feet for heavily traveled routes. This allows a moving bus to pass a bicyclist without the bus drifting into the adjacent travel lane or forcing the bicyclist into the gutter. The City's proposed plan indicates 14-foot wide shared lanes. However, this is often an improvement over existing narrower lane width.

Response: See response to comment #1.

8. The City of Portland, Oregon produced a successful training video for instructing transit drivers the best methods of interacting with cyclists on roadways. We suggest that the City contact the Portland Bicycle Coordinator.

Response: DTS will contact the Portland Bicycle Coordinator.

9. Curbside transit lanes often fill up with motorists turning right, squeezing bicyclists out, and defeating the purpose of improved transit service. Constructing right-hand turn pockets would alleviate the problem in the most-congested areas.

Response: DTS agrees with this statement and on Kūhio Avenue, right-turn pockets are included as part of the project.

10. In general, the cities that have implemented shared bus/bike lanes reported that commute conditions improved for buses and bikes compared to the No-Action scenario.

Response: We concur.

11. Traffic-calming methods would also improve safety for bicyclists and pedestrians along the transitways.

Response: We concur. Except where proposed as a mitigation measure, traffic calming is not a part of this project.

12. As noted in the EIS, the City must work with the community to refine bicycling and pedestrian components of the plan. Further details are yet to be worked out, including mapping locations of affected existing and future bikeways, design details, alternative bicycle routes, directional and

Lisa W. Reinke  
Page 3  
November 13, 2002

safety signage, enforcement of the exclusive use lanes, and incentives to encourage public transit system use. The Bicycling Committee offers our assistance to the Department of Transportation Services and their consultant, Parsons Brinckerhoff, on bicycle and pedestrian facility planning issues.

**Response:** The DTS will continue to coordinate with the Bicycling Committee on bicycle and pedestrian facility planning issues.

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

POLICE DEPARTMENT  
**CITY AND COUNTY OF HONOLULU**  
801 SOUTH BERTYAMIA STREET  
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JEREMY HARRIS  
MAYOR



LEE D. DOROHUZ  
CHIEF  
MICHAEL CARVALHO  
ROBERT AU  
DEPUTY CHIEFS

OUR REFERENCE CS-TL

October 31, 2000

TO: CHERYL D. SOON, DIRECTOR  
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: LEE D. DOROHUZ, CHIEF OF POLICE  
HONOLULU POLICE DEPARTMENT

SUBJECT: PRIMARY CORRIDOR TRANSPORTATION PROJECT

CHERYL D. SOON

Thank you for the opportunity to review the Major Investment Study/Draft Environmental Impact Statement for the Primary Corridor Transportation Project.

The Honolulu Police Department has the following concerns:

**Transit Centers:** Assaults and other crimes against people who use these facilities may become a problem and may cause an increase in calls for police service.

**Bus Rapid Transit:** Having bus stops in the middle of lanes of traffic may cause vehicular and pedestrian traffic safety problems as pedestrians try to cross lanes of traffic to get to street curbs. This may cause an increase in calls for police service.

If there are any questions, please call Sergeant Robert Lung of the Traffic Division at 529-3497 or Carol Soderstrom of the Support Services Bureau at 529-3658.

LEE D. DOROHUZ  
Chief of Police  
By   
EUGENE UEMURA  
Assistant Chief  
Support Services Bureau

cc: Office of Environmental Quality Control  
Parsons Brinckerhoff Quade and  
Douglas, Inc.

DEPARTMENT OF TRANSPORTATION SERVICES  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE NEGRO  
COUNTY DIRECTOR

TPD1100-05334R

November 13, 2002

MEMORANDUM

TO: LEE D. DONOHUE, CHIEF OF POLICE  
POLICE DEPARTMENT

FROM: CHERYL D. SOON, DIRECTOR

SUBJECT: PRIMARY CORRIDOR TRANSPORTATION PROJECT

This is in response to your October 31, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. Assaults and other crimes against people who use these facilities (transit centers) may become a problem and may cause an increase in calls for police service.

**Response:** Security planning is a part of the overall system design. System security will be provided to protect the public and the transit system from crime and vandalism. Security system elements may include a combination of design treatments and use of personnel to deter crime (e.g., video surveillance, transit system workers, special transit police, and local police). A comprehensive System Security Plan will be prepared during the final design phase to address passenger security, employee security, revenue security, vandalism, theft, crowd control, power/mechanical failures, fires, accidents, and other incidents.

2. Having bus stops in the middle of lanes of traffic may cause vehicular and pedestrian traffic safety problems as pedestrians try to cross lanes of traffic to get to street curbs. This may cause an increase in calls for police service.

**Response:** The preliminary design of the median transit stations includes features, such as railings to discourage transit patrons from exiting the platform except at designated locations and serve as a barrier between the platform and the general-purpose traffic lanes. Transit stations located in the median will be located at signalized intersections and will include cross walks and traffic signals to allow pedestrians to safely cross the street.

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

CHERYL D. SOON

November 14, 2000

TESTIMONY

TO: THE HONORABLE DUKE BAINUM  
TRANSPORTATION CHAIR AND MEMBERS OF THE  
TRANSPORTATION COMMITTEE

FROM: CHRISTINA KEMMER, CHAIR  
TRANSPORTATION COMMISSION

SUBJECT: Transportation Commission Testimony in  
Unanimous Support of Resolution 00-29 for the Selection of a  
Locally Preferred Alternative for the Primary Corridor  
Transportation Project.

Chair Bainum, members of the committee, I am Christina Kemmer, chair of the City and County of Honolulu's Transportation Commission.

The commissioners are here today to speak in unanimous support for a fully integrated public transit system, and to the selection of a locally preferred alternative for the primary corridor transportation project.

Our commission is a working commission, with commissioners having taken the time to attend and participate in workshops, visit on-site integrated transportation systems, and listen to the voice of the communities they live in.

We have learned that our community needs a transportation system that is:

- Timely, frequent, and secure.
- Environmentally friendly.
- Accessible to the physically challenged.
- Timely and reliable for housing, job training, employment, education, recreation, child care, health, and social services.
- Capable of moving employees and students to and from the urban core including Waikiki.
- Will revitalize neighborhoods and stimulate economic prosperity.
- Financially affordable.

We have also learned that a campaign on how to use public transportation for work, recreation, entertainment, and for access to education is necessary.

Five of our six commissioners are here today to speak to their support for Resolution 00-29. See attached list.

Donald Takaki our vice chair is on the mainland and has asked me to convey his support with the following comments: "As the vice chair of the Transportation Commission, and vice president of Island Movers, Inc. I am deeply impacted by transportation issues on our island. I experience first-hand the effect on our business and our community when we have delays and congestion on our roadways. Although there is no perfect solution to our problems, I believe BRT is a positive step that we should not hesitate to take. From the DEIS, I believe that it will help integrate our transportation system, and pave the way for further enhancements."

At this time I would like to introduce our commissioners and ask them to comment on the reasons for their support.

In conclusion, we feel an information gathering process has occurred beyond the federally mandated requirements. Community information was gathered through Trans2K workshops, presentations and multiple public hearings, all giving the public a chance to shape the alternatives and comment on the impacts. The community agrees traffic is a problem and is getting worse. They also feel we need to do something and move ahead with appropriate solutions for our lifestyle and environment. The City and County Department of Transportation Services has been responsive by implementing express bus service, commencing hub and spoke systems with circulators, implementing traffic calming measures and an island-wide bike plan. Additionally, the State has sponsored a ferry from Barber's Point and highway zipper lanes. Time has also been allocated to ensure land use and business policies are taking public transportation into consideration.

In conclusion, let us move ahead. We thank you for this opportunity to testify.

END

**Role of the Transportation Commission:**

The Transportation Commission's role is advisory to the Mayor and City Council of the City and County of Honolulu. The Commission advises and makes recommendations to reflect the present and future public transportation needs of residents, businesses, and visitors to the Island of Oahu.

**CITY & COUNTY OF HONOLULU  
TRANSPORTATION COMMISSION  
OCTOBER 2000**

**Name/Address**  
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Amfac Center - Hawaii Tower, Penthouse Two  
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**Term Expiration**  
June 30, 2002

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June 30, 2000

Raul T. Leong  
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June 30, 2000

Charles O. Swanson  
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June 30, 2001

Donn M. Takaki, Vice Chair  
98-415 Puuahi Street  
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June 30, 2001

Claire Tamamoto  
89-21- Halimahu Place  
Aiea, Hawaii 96701  
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June 30, 2004

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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE TEOH • MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

Ms. Christina Kemmer, Chair  
Transportation Commission  
City and County of Honolulu  
Amfac Center - Hawaii Tower, Penthouse Two  
745 Fort Street  
Honolulu, Hawaii 96813

Dear Ms. Kemmer:

Subject: Primary Corridor Transportation Project

This responds to your comment on the Major Investment Study/Draft Environmental Impact Statement (MIS/EIS). At the November 14, 2000 Transportation Committee meeting, you supported selecting the Bus Rapid Transit as the Locally Preferred Alternative. Thank you for supporting the project.

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE YEGOROV LUYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

Mr. Donn M. Takaki, Vice-Chair  
Transportation Commission  
City and County of Honolulu  
98-415 Puuaili Street  
Aiea, Hawaii 96701

Dear Mr. Takaki:

Subject: Primary Corridor Transportation Project

This responds to your comment on the Major Investment Study/Draft Environmental Impact Statement. At the November 14, 2000 Transportation Committee meeting, you supported selecting the Bus Rapid Transit as the Locally Preferred Alternative. Thank you for supporting the project.

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

Sincerely,  
  
CHERYL D. SOON  
Director







**Final Environmental Impact Statement**  
**Primary Corridor Transportation Project**

**Chapter 7.0**  
**Comments and Responses**  
**Elected Officials**



DANIEL K. AKAKA  
SENATOR

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United States Senate

WASHINGTON, DC 20540-1103

April 22, 2002

Ms. Cheryl D. Soon

Director

Department of Transportation Services  
City and County of Honolulu  
711 Kapiolani Boulevard, #1200  
Honolulu, HI 96813

Dear Ms. Soon:

Thank you for providing me a copy of the Supplemental Draft Environmental Impact Statement (DEIS) for the Primary Corridor Transportation Project prepared by the U.S. Department of Transportation and the City and County of Honolulu Department of Transportation.

I appreciate receiving this information and look forward to reviewing the final Environmental Impact Statement for this project.

Once again, mahalo for taking the time to share the Supplemental DEIS with me.

Aloha pumehana,

*Daniel K. Akaka*  
DANIEL K. AKAKA  
U.S. Senator

COMMITTEES /  
ARMED SERVICES  
BANKING, HOUSING, AND  
URBAN AFFAIRS  
ENERGY AND NATURAL RESOURCES  
GOVERNMENTAL AFFAIRS  
INDIAN AFFAIRS  
VETERANS' AFFAIRS  
SELECT COMMITTEE ON ETHICS

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CITY AND COUNTY OF HONOLULU

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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE KEOKI IYAMOTO  
DEPUTY DIRECTOR

TPD4/02-01674R

November 13, 2002

The Honorable Daniel K. Akaka  
United States Senator  
3106 Prince Jonah Kuhio  
Kalani'aoale Federal Building  
P.O. Box 50144  
Honolulu, Hawaii 96850

Dear Senator Akaka:

Subject: Primary Corridor Transportation Project

This is in response to your April 22, 2002 letter regarding the Supplemental Draft Environmental Impact Statement (SDEIS), which stated you had no comments. We appreciate you taking the time to review the SDEIS.

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

Sincerely,

*Cheryl D. Soon*  
CHERYL D. SOON  
Director



The Senate  
Twentieth Legislature  
State of Hawaii

November 6, 2000

Ms. Cheryl Soon, Director  
City Department of Transportation Services  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813

Subject: Comments on Primary Corridor Transportation Project Draft EIS  
Dear Ms. Soon:

The purpose of this letter is to submit our comments on the Draft Environmental Impact Statement for the Primary Corridor Transportation Project. We appreciate your support of the October 2nd community briefing we co-sponsored, and hope that the comments presented will be useful to you in preparing the final EIS and shaping the public decision-making process on this project.

We support the Transportation Management System alternative, if it is recommended in the final EIS. We have not yet decided on our support of the Bus Rapid Transit alternative, because we believe more information is needed on this option. If the BRT system is the option recommended, we believe that - besides more information, the public will need more discussion on the project's assumptions, strategies, and projections in order to accept city actions to implement the project. After all, this would be one of the largest CIP projects in the city's history.

Our comments on the DEIS all pertain to the Bus Rapid Transit alternative and are submitted in the form of requests or questions, listed below, because our aim is to have additional information on the BRT option included in the final EIS.

1. Please provide more detailed information on BRT ridership projections, including underlying assumptions, breakdowns for peak traffic periods of the day, etc., for the Kapiolani Boulevard route segment.
2. Also, provide detailed information on vehicular traffic count projections on Kapiolani Boulevard, from South Street to University Avenue, after the BRT route has removed two lanes from vehicular use. We are concerned that removal of two traffic lanes on Kapiolani Blvd. may cause severe traffic congestion, especially for residents who live in this area.
3. What are the assumptions, calculations, projections, etc. under the BRT option that are used to project a reduced traffic count along Kapiolani Boulevard, including peak traffic periods, since the traffic capacity is reduced by two lanes?

4. Since vehicular ridership is reduced due to removal of two traffic lanes on Kapiolani Blvd, please provide information on the number of vehicular drivers and riders that will choose to use the BRT system, rather than their own vehicles, for their transportation needs. Also, provide information and assumptions to explain the behavior of vehicular drivers and riders in choosing the BRT over personal vehicles. Has any studies been conducted or utilized on this subject?
5. While a number of current vehicular riders may use the BRT system under certain conditions, many such riders will continue to use their vehicles for trips to destinations outside the BRT route and other short trips. What are the traffic count projections for these types of trips, and won't these trips still require travel along the congested Kapiolani Boulevard?
6. Some Waikiki residents are concerned that the Waikiki spur does not include the Kalakaua Avenue section between the Kapiolani Blvd. & Kuhio Avenue junction. What combination bus/BRT route will be available for Waikiki residents living in Four Paddle Condo, near Kuhio Ave. and Launui St., who want to go to the convention center or to the University of Hawaii? Also, what is the justification for designing the BRT routes so as to make it not useful for conventioners to travel from their hotels to the convention center?
7. Waikiki businesses/hotels are concerned about the loss of another lane in Waikiki. Specifically what loading zones and driveways now used by businesses will be removed and/or blocked under the BRT option, and what mitigation measure will be taken for each? Also, what are the contingency plans to mitigate unexpected problems, such as water main breaks on Kalakaua Ave.?
8. Please explain why this project is proceeding before the Primary Urban Core Development Plan is revised as required by county ordinance. Shouldn't the City adopt a development plan before it decides on a BRT system which would impact and direct development in the urban core?
9. What approvals and permits will be required to (a) locate a power sub-station on Kapiolani Park; and (b) remove, relocate, or cut trees along Kapiolani Blvd. & University Ave., and in/around Kapiolani Park?
10. Are there any other transportation-related facilities, such as peripheral parking facilities, that will be required to implement the BRT alternative?

Thank you for the opportunity to submit our comments on the DEIS for the Primary Corridor Transportation Project. If you have any questions, please do not hesitate to contact either of us.

Sincerely,

*Carol Fukunaga*  
CAROL FUKUNAGA

State Senator, 12th District

*Les Ihara, Jr.*  
LES IHARA, JR.

State Senator, 10th District

cc: Parsons Brinckerhoff Quade and Douglas  
Office of Environmental Quality Control

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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE 'KEOHO' MIYAKOTO  
DEPUTY DIRECTOR

TPD1100-05385R

November 13, 2002

The Honorable Carol Fukunaga  
House of Representatives  
State Capitol, Room 216  
Honolulu, Hawaii 96813

Dear Representative Fukunaga:

Subject: Primary Corridor Transportation Project

This is in response to your November 6, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. We support the Transportation Management System alternative, if it is recommended in the final EIS. We have not yet decided on our support of the Bus Rapid Transit alternative, because we believe more information is needed on this option.

Response: More information in response to specific questions in this letter is contained in the Response to Comments section and in other sections of the FEIS.

2. If the BRT system is the option recommended, we believe that, besides more information, the public will need more discussion on the project's assumptions, strategies, and projections in order to accept city actions to implement the project.

Response: On November 29, 2000, the City Council adopted a resolution identifying the Bus Rapid Transit (BRT) Alternative as the Locally Preferred Alternative (LPA).

To continue the public involvement commitment during the Primary Corridor Transportation Project Preliminary Engineering/Final Environmental Impact Statement (PE/FEIS) phase, community working groups were established by geographical areas (Pearl City/Alea, Kailua, Downtown/Kakaako, Mid-Town/University, and Waikiki) to provide input and feedback on the proposed BRT project to the technical staff. The working group members simultaneously received a greater in-depth understanding about BRT and what it means to the community. The working group format enabled community representatives to discuss specific issues and potential design solutions directly with the project's transportation and environmental planners. Working group members exchanged information on community needs and technical details of the BRT schemes. The project team then carried out additional studies and developed project refinements as a result of working group discussions.

The Honorable Carol Fukunaga  
Page 2  
November 13, 2002

In addition, the Oahu Trans 2K public workshops continue being held to inform the public about project refinements identified through the Working Group meetings. To keep the public informed since adoption of the LPA, two Progress Reports (newsletters) were published and distributed to over 10,000 recipients.

Even after the NEPA process has concluded and the Record of Decision (ROD) has been issued, public involvement will continue in many areas, such as planning, design and construction of transit centers, transit stops, joint development, streetscapes, landscaping, station location and design studies, aesthetic design of vehicles, ITS and particulars of the ticketing system.

3. Please provide more detailed information on BRT ridership projections, including underlying assumptions, breakdowns for peak traffic periods of the day, etc., for the Kapiolani Boulevard route segment.

Response: The travel forecasts for the Primary Corridor Transportation Project FEIS were developed using travel forecasting models developed for the Oahu Metropolitan Forecasting Model Development Project in April 1998. These procedures simulate the choices made by residents, business, and visitors regarding the nature, number, mode, time-of-day, and geographic orientation of trips that they make on a typical weekday. The procedures have been developed with data obtained in extensive surveys of Oahu households, transit riders, and air passengers. Future year forecasts reflect the population and employment forecasts that have been prepared by DBEDT and the zonal allocations that have been prepared by the City Department of Planning and Permitting.

The travel forecasting methodology and resulting travel forecasts used for the Primary Corridor Transportation Project are described in the FEIS Chapter 4. The transportation plan for Oahu is described in the Oahu Metropolitan Planning Organization's report, Transportation for Oahu Plan TOP 2025.

Section 4.4.2.3 of the FEIS presents the traffic analysis along the Kapiolani Boulevard route segment with the Reformed LPA. The findings are that: 1) converting two lanes for exclusive BRT use will allow the BRT to operate through congested intersections with less delay; and 2) while there will be a drop in the level of service (LOS) for autos, Kapiolani Boulevard will still be operating acceptably for urban peak period conditions.

4. Also, provide detailed information on vehicular traffic count projections on Kapiolani Boulevard, from South Street to University Avenue, after the BRT route has removed two lanes from vehicular use. We are concerned that removal of two traffic lanes on Kapiolani Blvd. may cause severe traffic congestion, especially for residents who live in this area.

Response: See response to comment #3.

5. What are the assumptions, calculations, projections, etc. under the BRT option that are used to project a reduced traffic count along Kapiolani Boulevard, including peak traffic periods, since the traffic capacity is reduced by two lanes?

Response: See response to comment #3.

6. Since vehicular ridership is reduced due to removal of two traffic lanes on Kapiolani Blvd., please provide information on the number of vehicular drivers and riders that will choose to use the BRT system, rather than their own vehicles, for their transportation needs. Also, provide information and assumptions to explain the behavior of vehicular drivers and riders in choosing the BRT over personal vehicles. Has any studies (sic) been conducted or utilized on this subject?

**Response:** See response to comment #3.

7. While a number of current vehicular riders may use the BRT system under certain conditions, many such riders will continue to use their vehicles for trips to destinations outside the BRT route and other short trips. What are the traffic count projections for these types of trips, and won't these trips still require travel along the congested Kapiolani Boulevard?

**Response:** The Refined LPA is part of a comprehensive approach to serving the travel desires within Honolulu. People will continue to use automobiles to travel even with the BRT system in place. BRT vehicles, along with limited stop buses, local buses, and circulator buses, will provide an alternative mode of travel for those who can take advantage of the service provided. The Refined LPA will provide a better level of transit service than the No-Build or TSM Alternatives.

Automobiles that travel on Kapiolani Boulevard during the peak traffic periods are likely to experience more delay than with the No-Build and TSM Alternatives. That increased delay is offset by the greater number of people that can travel through the corridor during the same time period due to the enhanced level of transit service that the Refined LPA provides. These trips are included in the traffic analysis presented in Section 4.4.2.3 of the FEIS.

8. Some Waikiki residents are concerned that the Waikiki spur does not include the Kalakaua Avenue section between the Kapiolani Blvd. & Kuhio Avenue junction. What combination bus/BRT route will be available for Waikiki residents living in Four Peddle condo, near Kuhio Ave. and Leunio St., who want to go to the convention center or to the University of Hawaii? Also, what is the justification for designing the BRT routes so as to make it not useful for conventioners to travel from their hotels to the convention center?

**Response:** Prior to selection of Kalakaua and Kuhio Avenues as the Refined Locally Preferred Alternative route in Waikiki, the City analyzed a variety of alternative routes including: (1) two-direction service on Kuhio; (2) a Kuhio-Ala Wai BRT couplet; (3) a Kalakaua-Ala Wai BRT couplet; and (4) turning back BRT service at or near Saratoga and Kalakaua. None of these alternatives provide as good a service to residents and employees in central Waikiki as the Refined LPA route. There will be City bus routes that connect Waikiki with the Convention Center and UH. The reason that the In-Town BRT does not connect Waikiki hotels and the Convention Center is that due to the surge nature of these trips they are best served by pre-arranged shuttles provided by the private sector.

9. Waikiki businesses/hotels are concerned about the loss of another lane in Waikiki. Specifically what loading zones and driveways now used by businesses will be removed and/or blocked under the BRT option, and what mitigation measure will be taken for each?

**Response:** In the public outreach for the project, the City established a Working Group (WG) for the Waikiki area composed of representatives from the hotels, retail and service industries, commercial passenger and freight carriers, residents, government agencies, and other stakeholder groups. A detailed study of passenger and freight loading activities was performed

and reviewed with the Waikiki WG. Discussions with this Working Group led to revisions in the proposed project that resulted in no appreciable loss of on-street loading space along the streets affected by the BRT. This was achieved by allowing freight carriers to use the makai BRT shared lane on Kalakaua Avenue during legal delivery hours (10 P.M. to 9 A.M.); the BRT would simply pass around a stopped loading truck by using the adjacent traffic lane. On Kuhio Avenue, vehicle pullouts have been identified on each block face to serve passenger and freight loading on both sides of the street. Freight deliveries would be permitted just as today on Kuhio Avenue, between 10 P.M. and 7:30 A.M.

10. Also, what are the contingency plans to mitigate unexpected problems, such as water main breaks on Kalakaua Ave?

**Response:** Both of the technologies being considered for the In-Town BRT permit the buses to deviate off of the designated route to go around problem locations such as a water main break.

11. Please explain why this project is proceeding before the Primary Urban Core Development Plan is revised as required by county ordinance. Shouldn't the City adopt a development plan before it decides on a BRT system which would impact and direct development in the urban core?

**Response:** There is no indication of when the updated Primary Urban Core Development Plan (PUC DP) will be adopted by the City Council. The environmental review process of the Primary Corridor Transportation Project (PCTP) cannot be delayed pending this outcome. The In-Town BRT has been designed to support current land uses and future land use patterns, particularly in vacant and underutilized parcels in Kakaako, Iwilei, and near Ala Moana Center and the Convention Center. These are the locations where development is likely to occur with or without the PCTP. Because of this, the Refined LPA has been evaluated in the FEIS as being consistent with the Public Review Draft of the PUC DP (May 2002), as well as the current PUC DP adopted in 1990.

12. What approvals and permits will be required to (a) locate a power sub-station on Kapiolani Park; and (b) remove, relocate, or cut trees along Kapiolani Blvd. and University Ave., and in/around Kapiolani Park?

**Response:** The traction power supply station previously planned for Kapiolani Park has been relocated to a site Ewa of Kapahulu Avenue along Kuhio Avenue. Therefore, no tree impacts will occur at Kapiolani Park.

Regarding removing, relocating, or pruning trees, a certified arborist will oversee any work to be conducted on trees. Recent project planning has involved careful review of trees along the In-Town BRT alignment that may be adversely affected. Where possible, project designs have attempted to avoid trees. However, in some areas, namely on portions of Dillingham Boulevard, Kapiolani Boulevard, University Avenue, Saratoga Road, and Kalia Road in Waikiki, some trees will have to be replanted or removed to allow for necessary road widening. In the event that some larger trees cannot be successfully moved back, they will be replaced with smaller trees of the same species. No exceptional trees have been identified as being affected. Work on street trees will be coordinated with the Department of Parks and Recreation and an excavation permit will be necessary for replanting. No "exceptional" tree have been identified as being affected.

The Honorable Carol Fukunaga  
Page 5  
November 13, 2002

13. Are there any other transportation-related facilities, such as peripheral parking facilities, that will be required to implement the BRT alternative?

**Response:** All facilities required to implement the BRT are discussed in the FEIS.

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE NEOSI • LUKALUOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD1100-05385R

The Honorable Les Ihara, Jr.  
The Senate  
State of Hawaii  
State Capitol, Room 217  
Honolulu, Hawaii 96813

Dear Senator Ihara:

**Subject: Primary Corridor Transportation Project**

This is in response to your November 6, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. We support the Transportation Management System alternative, if it is recommended in the final EIS. We have not yet decided on our support of the Bus Rapid Transit alternative, because we believe more information is needed on this option.

**Response:** More information in response to specific questions in this letter is contained in the Response to Comments section and in other sections of the FEIS.

2. If the BRT system is the option recommended, we believe that, besides more information, the public will need more discussion on the project's assumptions, strategies, and projections in order to accept city actions to implement the project.

**Response:** On November 29, 2000, the City Council adopted a resolution identifying the Bus Rapid Transit (BRT) Alternative as the Locally Preferred Alternative (LPA).

To continue the public involvement commitment during the Primary Corridor Transportation Project Preliminary Engineering/Final Environmental Impact Statement (PE/FEIS) phase, community working groups were established by geographical areas (Pearl City/Aiea, Kaili, Downtown/Kakaako, Mid-Town/University, and Waikiki) to provide input and feedback on the proposed BRT project to the technical staff. The working group members simultaneously received a greater in-depth understanding about BRT and what it means to the community. The working group format enabled community representatives to discuss specific issues and potential design solutions directly with the project's transportation and environmental planners. Working group members exchanged information on community needs and technical details of the BRT schemes. The project team then carried out additional studies and developed project refinements as a result of working group discussions.

In addition, the Oahu Trans 2K public workshops continue being held to inform the public about project refinements identified through the Working Group meetings. To keep the public informed since adoption of the LPA, two Progress Reports (newsletters) were published and distributed to over 10,000 recipients.

Even after the NEPA process has concluded and the Record of Decision (ROD) has been issued, public involvement will continue in many areas, such as planning, design and construction of transit centers, transit stops, joint development, streetscapes, landscaping, substation location and design studies, aesthetic design of vehicles, ITS and particulars of the ticketing system.

3. Please provide more detailed information on BRT ridership projections, including underlying assumptions, breakdowns for peak traffic periods of the day, etc., for the Kapiolani Boulevard route segment.

**Response:** The travel forecasts for the Primary Corridor Transportation Project FEIS were developed using travel forecasting models developed for the Oahu Metropolitan Forecasting Model Development Project in April 1998. These procedures simulate the choices made by residents, business, and visitors regarding the nature, number, mode, time-of-day, and geographic orientation of trips that they make on a typical weekday. The procedures have been developed with data obtained in extensive surveys of Oahu households, transit riders, and air passengers. Future year forecasts reflect the population and employment forecasts that have been prepared by DBEDT and the zonal allocations that have been prepared by the City Department of Planning and Permitting.

The travel forecasting methodology and resulting travel forecasts used for the Primary Corridor Transportation Project are described in the FEIS Chapter 4. The transportation plan for Oahu is described in the Oahu Metropolitan Planning Organization's report, Transportation for Oahu Plan TOP 2025.

Section 4.4.2.3 of the FEIS presents the traffic analysis along the Kapiolani Boulevard route segment with the Refined LPA. The findings are that: 1) converting two lanes for exclusive BRT use will allow the BRT to operate through congested intersections with less delay; and 2) while there will be a drop in the level of service (LOS) for autos, Kapiolani Boulevard will still be operating acceptably for urban peak period conditions.

4. Also, provide detailed information on vehicular traffic count projections on Kapiolani Boulevard, from South Street to University Avenue, after the BRT route has removed two lanes from vehicular use. We are concerned that removal of two traffic lanes on Kapiolani Blvd. may cause severe traffic congestion, especially for residents who live in this area.

**Response:** See response to comment #3.

5. What are the assumptions, calculations, projections, etc. under the BRT option that are used to project a reduced traffic count along Kapiolani Boulevard, including peak traffic periods, since the traffic capacity is reduced by two lanes?

**Response:** See response to comment #3.

6. Since vehicular ridership is reduced due to removal of two traffic lanes on Kapiolani Blvd., please provide information on the number of vehicular drivers and riders that will choose to use the BRT system, rather than their own vehicles, for their transportation needs. Also, provide information and assumptions to explain the behavior of vehicular drivers and riders in choosing the BRT over personal vehicles. Has any studies (sic) been conducted or utilized on this subject?

**Response:** See response to comment #3.

7. While a number of current vehicular riders may use the BRT system under certain conditions, many such riders will continue to use their vehicles for trips to destinations outside the BRT route and other short trips. What are the traffic count projections for these types of trips, and won't these trips still require travel along the congested Kapiolani Boulevard?

**Response:** The Refined LPA is part of a comprehensive approach to serving the travel desires within Honolulu. People will continue to use automobiles to travel even with the BRT system in place. BRT vehicles, along with limited stop buses, local buses, and circulator buses, will provide an alternative mode of travel for those who can take advantage of the service provided. The Refined LPA will provide a better level of transit service than the No-Build or TSM Alternatives.

Automobiles that travel on Kapiolani Boulevard during the peak traffic periods are likely to experience more delay than with the No-Build and TSM Alternatives. That increased delay is offset by the greater number of people that can travel through the corridor during the same time period due to the enhanced level of transit service that the Refined LPA provides. These trips are included in the traffic analysis presented in Section 4.4.2.3 of the FEIS.

8. Some Waikiki residents are concerned that the Waikiki spur does not include the Kalaheo Avenue section between the Kapiolani Blvd. & Kuhio Avenue junction. What combination bus/BRT route will be available for Waikiki residents living in Four Paddle condo, near Kuhio Ave. and Leialua St., who want to go to the convention center or to the University of Hawaii? Also, what is the justification for designing the BRT routes so as to make it not useful for conventioners to travel from their hotels to the convention center?

**Response:** Prior to selection of Kalaheo and Kuhio Avenues as the Refined Locally Preferred Alternative route in Waikiki, the City analyzed a variety of alternate routes including: (1) two-direction service on Kuhio; (2) a Kuhio-Ala Wai BRT couplet; (3) a Kalaheo-Ala Wai BRT couplet; and (4) turning back BRT service at or near Saratoga and Kalaheo. None of these alternatives provide as good a service to residents and employees in central Waikiki as the Refined LPA route. There will be City bus routes that connect Waikiki with the Convention Center and UH. The reason that the In-Town BRT does not connect Waikiki hotels and the Convention Center is that due to the surge nature of these trips they are best served by pre-arranged shuttles provided by the private sector.

9. Waikiki businesses/hotels are concerned about the loss of another lane in Waikiki. Specifically what loading zones and driveways now used by businesses will be removed and/or blocked under the BRT option, and what mitigation measure will be taken for each?

**Response:** In the public outreach for the project, the City established a Working Group (WG) for the Waikiki area composed of representatives from the hotels, retail and service industries, commercial passenger and freight carriers, residents, government agencies, and other stakeholder groups. A detailed study of passenger and freight loading activities was performed

and reviewed with the Waikiki WG. Discussions with this Working Group led to revisions in the proposed project that resulted in no appreciable loss of on-street loading space along the streets affected by the BRT. This was achieved by allowing freight carriers to use the maikai BRT shared lane on Kalakaua Avenue during legal delivery hours (10 P.M. to 9 A.M.); the BRT would simply pass around a stopped loading truck by using the adjacent traffic lane. On Kūhio Avenue, vehicle pickups have been identified on each block face to serve passenger and freight loading on both sides of the street. Freight deliveries would be permitted just as today on Kūhio Avenue, between 10 P.M. and 7:30 A.M.

10. Also, what are the contingency plans to mitigate unexpected problems, such as water main breaks on Kalakaua Ave?

Response: Both of the technologies being considered for the In-Town BRT permit the buses to deviate off of the designated route to go around problem locations such as a water main break.

11. Please explain why this project is proceeding before the Primary Urban Core Development Plan is revised as required by county ordinance. Shouldn't the City adopt a development plan before it decides on a BRT system which would impact and direct development in the urban core?

Response: There is no indication of when the updated Primary Urban Core Development Plan (PUC DP) will be adopted by the City Council. The environmental review process of the Primary Corridor Transportation Project (PCTP) cannot be delayed pending this outcome. The In-Town BRT has been designed to support current land uses and future land use patterns, particularly in vacant and underutilized parcels in Kaikako, Iwilei, and near Ala Moana Center and the Convention Center. These are the locations where development is likely to occur with or without the PCTP. Because of this, the Refined LPA has been evaluated in the FEIS as being consistent with the Public Review Draft of the PUC DP (May 2002), as well as the current PUC DP adopted in 1990.

12. What approvals and permits will be required to (a) locate a power sub-station on Kapiolani Park; and (b) remove, relocate, or cut trees along Kapiolani Blvd. and University Ave., and Inland Kapiolani Park?

Response: The traction power supply station previously planned for Kapiolani Park has been relocated to a site Ewa of Kapahulu Avenue along Kūhio Avenue. Therefore, no tree impacts will occur at Kapiolani Park.

Regarding removing, relocating, or pruning trees, a certified arborist will oversee any work to be conducted on trees. Recent project planning has involved careful review of trees along the In-Town BRT alignment that may be adversely affected. Where possible, project designs have attempted to avoid trees. However, in some areas, namely on portions of Dillingham Boulevard, Kapiolani Boulevard, University Avenue, Saratoga Road, and Kalia Road in Waikiki, some trees will have to be replanted or removed to allow for necessary road widening. In the event that some larger trees cannot be successfully moved back, they will be replaced with smaller trees of the same species. No exceptional trees have been identified as being affected. Work on street trees will be coordinated with the Department of Parks and Recreation and an excavation permit will be necessary for replanting. No "exceptional" tree have been identified as being affected.

13. Are there any other transportation-related facilities, such as peripheral parking facilities, that will be required to implement the BRT alternative?

Response: All facilities required to implement the BRT are discussed in the FEIS.

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

Sincerely,  


CHERYL D. SOON  
Director





**The Senate**  
**The Twenty-First Legislature**  
 of the  
**State of Hawaii**  
 STATE CAPITOL  
 HONOLULU, HAWAII 96813

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DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
 MAYOR

CHERYL D. SOON  
 DIRECTOR  
 GEORGE WEDO  
 DEPUTY DIRECTOR

TPD4/02-01574R

November 13, 2002

The Honorable Norman Sakamoto  
 The Senate  
 State of Hawaii  
 State Capitol, Room 213  
 Honolulu, Hawaii 96813  
 Dear Senator Sakamoto:

Subject: Primary Corridor Transportation Project

This is in response to your letter dated April 8, 2002 regarding comments on the the Supplemental Draft Environmental Impact Statement (SDEIS). Your letter provided us with the following comment:

*I continue to have concerns over the impact along the Dillingham Boulevard section of the proposal for BRT.*

*If the assumption is that autos and other vehicles will use arterials other than Dillingham, we need to clearly address the impacts along those corridors and provide mitigation measures along alternative routes as well.*

**Response:** In response to comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS), a series of working group meetings was held with business owners, property owners, community representatives, government agencies, and other stakeholders. This working group reviewed concerns expressed regarding the BRT Alternative discussed in the MIS/DEIS and made suggestions to improve it. The suggestions of the working group have been incorporated into the Refined Locally Preferred Alternative (LPA).

Section 4.4.2-1) of the Final Environmental Impact Statement (FEIS) addresses projected Year 2025 access and traffic conditions on Dillingham Boulevard based on the revised configuration that came out of the working group process. Table 4.4-3 in the FEIS summarizes the differences in distribution of traffic volumes along parallel roadway facilities and the resulting volume/capacity (V/C) ratios between the No-Build Alternative, TSM Alternative and Refined LPA. Table 4.4-3 also shows that the Refined LPA is projected to have a beneficial effect on the Kapaemahu screening through a reduction in auto traffic by attracting more trips to transit. The Refined LPA will result in almost 3,000 fewer vehicle trips in the peak direction during the A.M. peak hour than the No-Build Alternative and almost 2,000 fewer vehicle trips than the TSM Alternative during the same period. It is anticipated that for all alternatives, all roadways that make-up the Kapaemahu screening will be at or above capacity. However, because of the reduction in auto travel with the Refined LPA, even with one lane in each direction converted to exclusive transit use, Dillingham Boulevard will be able to maintain a V/C ratio of 1.00 with one less lane in each direction than in the No-Build and TSM Alternatives, and still result in lower V/C ratios on Nimitz Highway and the H-1 Freeway.

April 8, 2002

Ms. Cheryl D. Soon, Director  
 Department of Transportation Services  
 City and County of Honolulu  
 650 South King Street, 3<sup>rd</sup> Floor

RE: Primary Corridor Transportation Project  
Supplemental Draft Environmental Impact Statement

Ms. Soon,

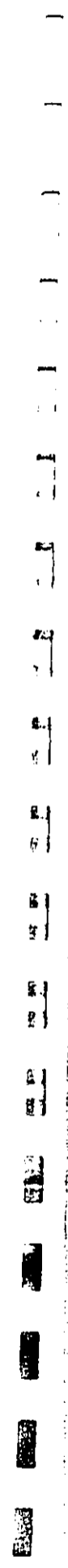
I continue to have concerns over the impact along the Dillingham Boulevard section of the proposal for BRT.

If the assumption is that autos and other vehicles will use arterials other than Dillingham, we need to clearly address the impacts along those corridors and provide mitigation measures along alternative routes as well.

Sincerely,

*Norman Sakamoto*  
 Norman Sakamoto  
 Senator, 16<sup>th</sup> district


Cc: Genevieve Salmonson



The Honorable Norman Sakamoto  
Page 2  
November 13, 2002

A copy of the FEIS will be sent to you under separate cover. We appreciate your interest in this important transportation project.

Sincerely,

  
CHERYL D. SOON  
Director



HOUSE OF REPRESENTATIVES

STATE OF HAWAII  
STATE CAPITOL  
HONOLULU, HAWAII 96813

April 20, 2002

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, HI 96813

RE: OPPOSITION TO BUS RAPID TRANSIT (BRT) SYSTEM

Dear Ms. Soon,

I submit this testimony to express my strong opposition to the proposed Bus Rapid Transit system.

Removing traffic lanes for the BRT will negatively impact our already crowded roadways and make traffic worse, not better. Traffic is a major problem for Oahu, but the BRT is not the solution. Moreover, I am concerned about the likelihood of increasing taxes for this proposed \$1+ billion project. Finally, a major change in commuter behavior to use the buses instead of cars, is needed to make the BRT work. I do not believe Hawaii commuters will make such a dramatic change in driving behavior.

Thank you for your time and please do not hesitate to contact me if you have any questions, comments or concerns.



Charles K. Djou  
House Minority Floor Leader  
Representative

CC: Ms. Genevieve Salmonson, Director, Office of Environmental Quality Control

Representative Charles K. Djou  
House Minority Floor Leader  
47th District (Honolulu, HI 96813)  
State Capitol, Room 317  
Honolulu, Hawaii 96813  
Phone: (808) 546-6190 • Fax: (808) 585-6487  
Email: repdjou@capitol.hawaii.gov • Web: www.capitol.hawaii.gov

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE KEOKI MIYAMOTO  
DEPUTY DIRECTOR

April 18, 2002

The Honorable Charles K. Djou  
Representative  
House of Representatives  
State Capitol, Room 313  
Honolulu, Hawaii 96813

Dear Representative Djou:

We have received your testimony and it will be entered into the record.

However, we request the opportunity to brief you on the project as based on your public statements you appear to have several misunderstandings.

Please call me at 523-4125 to schedule a meeting and if you have any questions.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE KEOKI MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD4102-01495R

The Honorable Charles K. Djou  
House of Representatives  
State of Hawaii  
State Capitol, Room 313  
Honolulu, Hawaii 96813

Dear Representative Djou:

Subject: Primary Corridor Transportation Project

This is in response to your April 20, 2002 letter regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS). We are responding to your the SDEIS.

1. Removing traffic lanes for the BRT will negatively impact our already crowded roadways and make traffic worse, not better. Traffic is a major problem for Oahu, but the BRT is not the solution.

Response: It is not the conversion of lanes that will create the congestion, the congestion for motorists will be there without the BRT. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

2. Moreover, I am concerned about the likelihood of increasing taxes for this proposed \$1+ billion project.

Response: This project has been developed following City Council policy to not increase taxes. The financial analysis (Chapter 6 of the Final Environmental Impact Statement (FEIS)) shows that no increases in existing taxes or new taxes will be required to fund the project as proposed.


3. Finally, a major change in commuter behavior to use the buses instead of cars, is needed to make the BRT work. I do not believe Hawaii commuters will make such a dramatic change in driving behavior.

Response: A major change in commuter behavior is not necessary for the Refined LPA to be successful. The shift in mode forecast from auto to transit is 1.3% for all trip purposes and 3.7% for work trips.

The Honorable Charles Djou  
Page 2  
November 13, 2002

We will send you a CD-ROM copy of the FEIS under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

  
CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
Mayor

CHERYL D. SOON  
DIRECTOR

GEORGE MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

The Honorable Galen Fox  
House of Representatives  
State of Hawaii  
Hawaii State Capitol, Room 319  
Honolulu, Hawaii 96813

Dear Representative Fox:

Subject: Primary Corridor Transportation Project

This is in response to your testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. Thank you for permitting me to comment on the BRT alignment. It runs through the district I represent in the State House. On behalf of the community I represent, I wish to register my opposition in the strongest possible terms to the use of, quote, "exclusive and semi-exclusive bus-only lanes," end quotes, on Ward Avenue, on Queen Street, Ala Moana Boulevard, Kalia Road, Kalakaua Avenue, and Kuliou Avenue, where creation of exclusive and semi-exclusive bus-only lanes results in one less lane of traffic available for privately-operated vehicles.

Response: Comment noted.

2. All these streets – Ward Avenue, on Queen Street, Ala Moana Boulevard, Kalia Road, Kalakaua Avenue, and Kuliou Avenue – are either currently congested for much of the day or will be once a lane of traffic is denied to the users of these streets.

Response: The BRT will operate in mixed traffic on Ward Avenue and Queen Street, not in exclusive or semi-exclusive lanes. Kalia Road and Ala Moana Boulevard between the Ala Wai Bridge and Kalia Road will be widened to accommodate two additional lanes for the BRT and other buses. On the remainder of Ala Moana Boulevard in your District as well as on Kalakaua and Kuliou Avenues where they have priority transit lanes, the BRT will share those lanes with private buses and right turning vehicles. With regard to congestion, because enough people will be diverted out of their cars onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives, and conditions will be much better for BRT riders since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

3. My understanding is that denying cars and other privately-operated vehicles use of a lane on these streets is part of a purposeful design to create such traffic jams, such havoc, such chaos, that people forced into the remaining lanes will be compelled to shift to public transportation. Please consider that such urban planning may be contrary to the best interest of the people you purport to serve.

**Response:** As the MISDEIS, SDEIS, and FEIS Chapter 1, Purpose and Need state, the project purpose is to increase the people-carrying 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 between communities in the Primary Urban Center to increase the attractiveness of in-town living.

4. *I held a community meeting devoted to the subject of exclusive and semi-exclusive bus-only lanes. The City refused to participate, though I made several attempts to attract their cooperation. The meeting was packed. We had to shift to a larger room, with over 150 people who were upset and alarmed about the loss of traffic lanes to exclusive and semi-exclusive bus-only lanes. Believe me, we have lots and lots of very upset people in my area who think the BRT plan is just crazy.*

**Response:** When you contacted the City to attend, you indicated in your oral invitation that the meeting was to be a staged event. We did not feel it was appropriate to attend.

We have been told by others that many in the audience were led to believe the meeting topics were the Hilton development project and the Ala Wai Boat Harbor. Under the circumstances, conclusions regarding BRT would be spurious at best.

To reiterate, there will be no loss of traffic lanes on Ala Moana Boulevard, which is where most of the attendees reside.

5. *Now, in the paper this morning, we have a picture that apparently was supplied by the City, showing exclusive lanes in this proposal. There is no marking of semi-exclusive lanes. I think you ought to make really clear what the difference between semi-exclusive and exclusive lanes are. To me, they are basically lanes that are denied to privately-operated vehicles. And it's very important.*

**Response:** As defined in the FEIS, exclusive lanes are for the exclusive use of transit vehicles. Exclusive lanes are typically in the street median, or when at curbside they are running contra-flow.

Semi-exclusive lanes refer to lanes restricted to use by BRT and other buses for through travel, as well as any for the use by other vehicles when turning right at an intersection or when entering or exiting a driveway. In Waikiki the semi-exclusive lanes will be shared with private buses and trolleys.

6. *In this article in the paper, Cheryl Soon, the Director of Transportation Services, is quoted as saying, "There is just no more room for cars. We've got to find alternatives." That's just the point. There's no room for cars. Why are you giving us less room for cars?*

**Response:** Since there is not enough room for extensive widening of streets and highways, the objective has been to make more efficient use of the space available by maximizing the number of people accommodated, not the number of vehicles.

7. *In the same article, an unidentified City engineer is purported as saying that, "If you go past Ward Avenue to Waikiki, there are 22 lanes of traffic. We're going to reserve just one of those lanes for*

*buses." That's completely inaccurate. It's not one. It's four. Four out of 22. And that makes a big difference. That's a 750 percent error or a 3,000 percent error, depending on how you do your math.*

**Response:** At the Ward Avenue screening there are 44 travel lanes when both directions are included. Of these one is an exclusive BRT lane and three are semi-exclusive lanes shared by the BRT, local buses, and right-turning autos.

8. *Finally, there's the quote from the Director of Transportation Services, "I'm not going to be swayed now by a lot of Johnny-come-lately's who are raising questions for only political reasons." This somehow contrasts with the quote of the Mayor, who says, "Thanks to the time and effort of community representatives, the City is going to be able to build a better transit system."*

**Response:** Comment noted.

9. *The trouble is, this issue has not been brought to the people in the area that live in this neighborhood until now, till after the City Council has already approved this system.*

**Response:** The Primary Corridor Transportation Project team members have attended hundreds of meetings where the project has been discussed and presented project information. Six working groups were formed, in the communities along the alignment, to present the project. The community outreach effort resulted in over ten project refinements.

10. *You're going for the funding of a system that apparently is going to start in Waikiki, when it makes more sense to start the system completely at the end where people are really suffering. They need to get into town, and there's no controversy about it. Let's reverse the process. Let's start out in the countryside.*

**Response:** Timing and implementation of the P.M. zipper lane and related Regional BRT improvements must be coordinated with the State DOT. SDOT wants to widen the H-1 Freeway in the areas where the P.M. zipper lane is proposed before installing the zipper lanes. Since the Waikiki segment of the In-Town BRT can be a viable improvement to the transit system immediately, the City Council has elected to proceed with this segment as the first step in phasing of the BRT system.

11. *Let's have good hearings here, and let's have you guys explain why semi-exclusive and exclusive lanes are good for the people of Waikiki and this neighborhood.*

**Response:** Priority lanes for buses will permit a way around the traffic congestion that will occur by 2025. The priority lanes will afford the faster speeds and greater reliability needed to attract people out of their autos. By so doing a greater number of people can be served without having to widen or double-deck the City's streets and highways.

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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FEREMY ALBERS  
Mayor



CHERYL D. SOON  
DIRECTOR  
GEORGE KEOKU UHIAUATO  
DEPUTY DIRECTOR

November 13, 2002

The Honorable Danyln Bunda  
Member, City Council  
City and County of Honolulu  
Honolulu, Hawaii 96813

Dear Councilmember Bunda:

Subject: Primary Corridor Transportation Project

This is in response to your testimony at the October 19, 2000 Special Transportation Committee Meeting regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. I'm a resident of Mililani and speaking in support of the BRT Alternative.
2. Now is the time for significant major investment in our transit system. It's more than just adding buses. We've got to go beyond band-aid solutions. It doesn't make any sense to have more buses if they're all stuck in traffic and they can't move about. People will not choose to use buses that way. It's not about getting people out of cars. It's about transportation choices. So people can choose to drive. They can choose to use the bus. They can choose to car pool or van pool. But the BRT will add to a complete more efficient TSM package.
3. The priority and dedicated transit lanes will provide the reliability and the dependability that we need to make transit a good choice. It will also add to the improve linkage and accessibility to make destinations such as University of Hawaii, Waikiki. The growth of Kapolei is another urban center. All told, I'm for the BRT Alternative.

We appreciate you taking the time to attend the hearing and for supporting the BRT Alternative.

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

FORWARDED:

BENJAMIN B. JEE, FAIA  
Managing Director

Sincerely,

CHERYL D. SOON  
Director

**CITY COUNCIL**  
CITY AND COUNTY OF HONOLULU  
HONOLULU, HAWAII 96813-3065 / TELEPHONE 547-7000

ROMY M. CACHOLA  
COUNCILMEMBER  
(808) 547-7007  
(808) 523-4220 (fax)  
e-mail: rmcachola@co.honolulu.hi.us

November 6, 2000

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, HI 96813

Dear Ms. Soon:

Re: Comments Relating to the Major Investment Study and Draft Environmental Impact Statement for the Primary Corridor Transportation Project

I am taking this opportunity to share with you my comments and the concerns of the community I represent regarding the above-referenced project.

For many years, neighborhoods in Kalihi, Salt Lake and Moanalua have endured residents of other communities parking in their neighborhoods only to hop on a bus to downtown. Not only does this practice compete for already limited on-street parking, but the traffic impacts in the Primary Urban Center are further exasperated by the additional vehicles.

With the understanding that park-and-ride facilities now exist in Hawaii Kai and Kunia, it is my contention that, if more park-and-ride were conveniently located in the City of Kapolei, Milliani, Wahiawa, Kaneohe and Kailua, residents would have a greater incentive to leave their cars in their own neighborhoods. Then, they will commute to Downtown Honolulu on the City's reconfigured hub-and-spoke network system, as well as the proposed Bus Rapid Transit system. There is a need to re-analyze and make more attractive the basic prerequisite that residents in outlying areas should utilize facilities like a park-and-ride in order to effectively reduce traffic on our freeways. If this is achieved, the high cost of providing parking and the necessary infrastructure can be avoided.

It is my further contention that providing for additional parking in the Primary Urban Center will be contrary to the City's goal to minimize the current traffic gridlock because residents will not be encouraged to take alternative transportation from a destination point in their own

**CITY COUNCIL**  
CITY AND COUNTY OF HONOLULU  
HONOLULU, HAWAII 96813-3086 / TELEPHONE 967-7000



DTS  
TRANS PLANNING

MAY 8 2002  
MAY 7 4 29 PM '02

ROMY M. CACHOLA  
COUNCIL MEMBER  
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e-mail: rochola@cc.honolulu.hawaii.gov

May 7, 2002

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, HI 96813

Dear Ms. Soon:

Re: Comments Relating to the Primary Corridor Transportation Project, Supplemental Draft Environmental Impact Statement (SDEIS)

Thank you for this opportunity to submit comments on the aforementioned project on behalf of residents in my district.

In addition to my previous letter dated November 6, 2000, which was not included in the original comments for the SDEIS, I wish to highlight three major areas of concern:

1. The Luapele Drive Ramp to H-1.
2. Middle Street Transit Center.
3. Dedicated Use of Lanca Along Dillingham Boulevard for the Bus Rapid Transit (BRT).

The following pages elaborates my concerns relating to the above-referenced areas. Italicized sections, in particular, raise questions or ask for clarification and/or discussion of certain issues.

LUAPELE DRIVE RAMP TO H-1

Residents in the Salt Lake, Foster Village and surrounding communities are very much against this proposal due to lack of input from community associations, neighborhood boards and other affected parties. They are also concerned with the level of noise, impact of traffic along Salt Lake Boulevard and Kamehameha Highway, and other possible negative impacts resulting from the Luapele Drive Ramp. The existing egress and ingress to the Aloha Stadium parking lot from

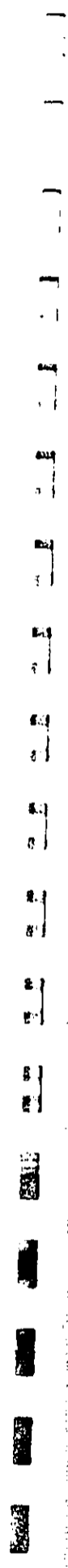
Ms. Cheryl D. Soon, Director  
November 6, 2000  
Page 2

neighborhoods in Leeward and Central Oahu. Unless the availability of parking is reduced in the Primary Urban Center, there is no incentive for our commuters to get out of their cars and thereby reduce traffic through the major bottlenecks on the major thoroughfares.

Thank you for this opportunity to share with you the concerns of my constituents. I look forward to working with you in the future in order to address the transportation needs of Honolulu. My warmest mahalo and aloha.

Very truly yours,

ROMY M. CACHOLA  
Council Member  
Council District VII



opposite sides is sufficient without having to incur additional expenses in the development of the Luapele Drive ramp. Moreover, a working group of residents from Salt Lake and Foster Village was never formed to discuss the Luapele Ramp, which was a recommendation from a working group comprised of residents from Alea and Pearl City. This working group was successful in deleting the Kaonohi Street ramp and the Kamehameha Drive-In Transit Center in favor of the Luapele Ramp and expansion of the Stadium Transit Center. If a viable push for the Luapele Drive ramp continues, then residents in neighboring affected communities should be afforded the courtesy of establishing working groups and the opportunity to discuss the Luapele proposal.

The following sections highlight concerns over noise, traffic and other negative impacts of the proposed Luapele Drive ramp.

**A. Noise**

The noise impact of the Luapele Drive ramp is based on the projected noise exposure of an unidentified single-family home located at Luaoie Place. The Luapele Drive ramp is projected to have in 2025 no noise impact on the home as measured according to Federal Transit Administration criteria.

(A) Please identify the location of the home.

(B) The discussion of noise impacts implies that the analysis was based on hybrid diesel/electric bus noise. Please clarify whether the noise analysis for the Luapele Drive ramp was based on hybrid or regular diesel bus noise. If the analysis was based on hybrid bus noise, the noise impact from regular diesel buses also should be discussed, at least for information in case the City acts slowly in procuring hybrid buses.

No discussion is provided on the noise impact on residences and businesses adjacent to Salt Lake Boulevard between Luapele Drive and the Aloha Stadium Transit Center. That section of Salt Lake Boulevard probably will experience additional bus trips. Please address the possible noise impact on such residences and businesses.

**B. Traffic**

The table below lists the projected levels of service at interactions near the Luapele Drive ramp for all Alternatives during the A.M. and P.M. peak hours in 2025. The source of the data is Table 4.2-7 on page 4-19 of the SDEIS.

**PROJECTED A.M. AND P.M. PEAK HOUR LEVELS OF SERVICE  
AT INTERSECTIONS NEAR LUAPELE DRIVE RAMP  
(In 2025)**

	No-Build		TSM		Refined BRT	
	Auto	Transit	Auto	Transit	Auto	Transit
Luapele/Salt Lake	C	C	C	C	C	C
Kahupaani/Salt Lake	D	C	D	C	C	C
	D	D	D	D	D	D
	F	D	F	D	E	D

Two questions arise from the data:

(A) Why are the levels of service under the Refined BRT Alternative the same as or better than the levels under the No-Build Alternative and TSM Alternative? Both the No-Build Alternative and TSM Alternative do not have the Luapele Drive ramp. Consequently, those Alternatives should not have the associated bus and high occupancy vehicle traffic projected under the Refined BRT Alternative.

(B) Why are there differences between the levels of service for auto and transit? Autos and buses will operate in mixed traffic lanes. Logically then, buses should not have an advantage over autos.

Please provide responses to these questions.

**Bus Trips**

Approximately 20 buses in each direction are projected as running through the Luapele Drive ramp apparently during the peak hour in 2025.

For the former Kaonohi ramp, some express buses from Leeward and Central Oahu traveling town-bound in the A.M. peak period were to exit the zipper lane at that ramp, access the former Pearlridge transit center, and then re-enter the zipper lane. The reverse movement was to occur in the P.M. peak period. Please provide a discussion of whether the express buses will use the Luapele Drive ramp in the same manner.

Table 3.1-3 of the Draft Technical Memorandum On Estimated Operating And Maintenance Costs, Draft Product 7-20, dated August 1999, lists the different bus routes for the original BRT Alternative. Please provide a similar table for the Refined BRT Alternative so that the layperson may better understand the planned bus movements for the Luapele Drive ramp.

**Aloha Stadium Transit Center**

In addition, neither the SDEIS or the MIS/DEIS discusses the impact of the Aloha Stadium transit center/park-and-ride facility on traffic at the adjacent intersection. No level of service analysis is provided for the Kamehameha Highway/ Salt Lake Boulevard intersection, although



logic dictates that more buses and autos will use the transit center's park-and-ride facility than under the No-Build or TSM Alternative.

Also, neither the SDEIS or the MIS/SDEIS discusses the noise impact of the Aloha Stadium transit center's park-and-ride facility. Please address the noise impact of the Aloha Stadium transit facility on the nearby Halawa Valley and Makalapa Manor residential communities.

C. Other Concerns

1. Widening — Despite plans to widen the H-1 freeway near the Luapele Drive ramp, the SDEIS is silent on the necessity for acquiring property for the widening. Please include a statement on whether property will have to be acquired for the widening. If acquisition is necessary, please identify the property.

2. Military Property — The Luapele Drive ramp is also near military property in Makalapa. Please address whether the ramp will impact military property.

3. Profile Sketches — The profiles of the Luapele Drive ramp in appendix B of the SDEIS do not clearly show where and how the ramp will rise from Luapele Drive to the H-1 freeway. Please provide profile sketches from different ground level views that are understandable by the layperson.

MIDDLE STREET TRANSIT CENTER

As we discussed in an earlier meeting, I am against purchasing private property on the Ewa side of the OCCC, specifically the Gaspro site on the makai end of Dillingham Boulevard, for the Kalihī Kai Transfer Center. The most optimal and cost effective solution for an in-town BRT would be to consolidate all operations at the Middle Street Transit Center.

A major concern of the Middle Street facility is some business displacements, perhaps up to a maximum of 17 businesses as a result of expanding the Middle Street Transit Center and extending Kaahāhi St. for the Iwilei Transit Center. Neither the SDEIS nor MIS/SDEIS, however, identifies the businesses to be displaced or the property to be taken. Nor does either document break down the number of displacements between the Middle Street facility and Iwilei Transit Center.

Please provide a list of the businesses to be displaced by the Middle Street facility expansion. The list also should include businesses to be partially displaced, if any, by the Middle Street expansion.

DILLINGHAM BOULEVARD IN-TOWN BRT ALIGNMENT

Some members of the public have expressed concerns about having only one general-purpose lane in each direction on Dillingham Boulevard. The limited number of general-purpose lanes is the result of the dedication of the median lanes exclusively for In-Town BRT vehicles.

Transit Travel Time

Despite the exclusive lanes, the transit travel time between Downtown and Kalihī of an In-Town vehicle is not substantially less than the bus travel times under the No-Build and TSM Alternatives. Neither of those Alternatives includes special treatment for buses on Dillingham Boulevard. The following presents "composite" peak period travel time data from Table 4.1-6 on page 4-7 of the SDEIS. The "Downtown" location is the "Fort Street Mall between Hotel & King" and the "Kalihī" location is the area bounded by "Waikamilo/Kalihī/Dillingham/McNeill [sic]."

IN-VEHICLE TRANSIT "COMPOSITE" PEAK PERIOD TRAVEL TIME  
(In 2025)

Downtown To	No-Build	TSM	Refined BRT
Kalihī	7.9 minutes	6.8 minutes	5.1 minutes

The differences in travel times among the Alternatives are not major. An In-Town BRT vehicle in the exclusive lane is projected to be faster by about 1.7 minutes than a bus in a general-purpose lane under the TSM Alternative. Compared to the No-Build Alternative, the In-Town BRT vehicle is projected to be faster by 2.8 minutes.

A statement in the SDEIS suggests that a relatively small difference in travel time may not have a significant effect. "Based on past model results, a two- to five-minute increase in travel time should not have a significant effect on transit ridership." See the second full paragraph on page 4-3 of the SDEIS.

- (A) Please provide a discussion on whether the costs of construction and operation of the exclusive lanes on Dillingham Boulevard are worth the travel time savings between Kalihī and Downtown.
- (B) Additionally, please provide the travel time for an In-Town BRT vehicle assumed to be operating in a general-purpose lane in the same manner as a bus under the No-Build and TSM Alternatives. Under the scenario, two general-purpose lanes in each direction on Dillingham Boulevard should be assumed. The information is intended to reveal the extent of the advantage of the exclusive lanes over general-purpose lanes.
- (C) The auto travel time between comparable points of the "Downtown to Kalihī" trip by the fastest route should be provided for each Alternative.

<sup>1</sup> The SDEIS does not explain why "composite" travel time is used or how "composite" travel time is determined.

<sup>2</sup> See the response to question (25) (B) on page 17 of Communication D-840 2000).

**Widening Impact**

In response to concerns about potential motorist delays from only one 14-foot general purpose lane in each direction, the Kaihi Working Group has recommended the widening of each lane to 18 feet between Laumaka Street and Waikamilo Road. Sidewalk widening and additions also are planned.

The SDEIS is silent regarding any other possible negative impact from the widening of Dillingham Boulevard or addition of new sidewalks. It does not expressly indicate whether any private or other property must be acquired for the widening or new sidewalks or whether abutting property will be affected in any other manner.

*Please provide a narrative describing or map depicting the following: (1) the specific Dillingham Boulevard sections to be widened for general-purpose lanes, sidewalks, or both and (2) the specific sections of Dillingham Boulevard where new sidewalks will be added.*

One impact presumably from the widening are some driveway impacts and the loss of one or two parking stalls for Kapalana Makai, an apartment complex on the corner of Dillingham Boulevard and McNeill Street. *Please discuss any mitigation measure for Kapalana Makai.*

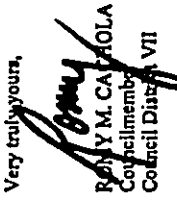
**Noise Impacts**

Moderate noise impacts are expected at only one location along the Dillingham Boulevard alignment, the Bishop Garden Apartments. The impact is projected with the hybrid diesel/electric vehicles, but not the embedded plate propelled vehicles. The Bishop Garden Apartments is near the Dillingham Boulevard/Waikamilo Road intersection. Notwithstanding the impact, noise mitigation is not deemed to be feasible and not planned to be included as part of the Refined BRT Alternative.

*An explanation should be provided on the reason noise mitigation for the Bishop Garden Apartments is not feasible. The explanation should address whether the construction of sound walls at the front property line of the Apartments was considered as a mitigating measure.*

In closing, please include my letter dated November 6, 2000, a copy of which is attached, along with the above-discussed comments for the SDEIS. I hope the concerns I have expressed will receive your favorable consideration. On behalf of my constituents, I would like to thank you for the opportunity to express my concerns on his very important transportation project for Oahu.

Very truly yours,

  
ROMY M. CAYETANO  
Councilmember  
Council District VII

cc: Gov. Benjamin Cayetano

Neighborhood Board No. 15  
Neighborhood Board No. 18  
Neighborhood Board No. 20  
Foster Village Community Association  
Halawa Valley Estates  
Oahu Metropolitan Planning Organization (OMPO)  
Kalihi Business Association (KBA)

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
MAYOR



CHEYL D. SOON  
DIRECTOR

GEORGE KEONI IYAMOTO  
DEPUTY DIRECTOR

TPD502-01842R  
TPD1100-05418R

November 13, 2002.

The Honorable Romy M. Cachola  
Member, City Council  
City and County of Honolulu  
Honolulu, Hawaii 96813

Dear Councilmember Cachola:

Subject: Primary Corridor Transportation Project

This is in response to your comments regarding the Major Investment Study/Draft Environmental Impact Statement (MISDEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your November 6, 2000 letter regarding the MISDEIS and Part B responds to your May 7, 2002 letter regarding the SDEIS.

Part A - MISDEIS Comments

1. *With the understanding that park-and-ride facilities now exist in Hawaii Kai and Kula, it is my contention that, if more park-and-ride were conveniently located in the City of Kepohe, Miliani, Waihawa, Kaneohe and Kailua, residents would have a greater incentive to leave their cars in their own neighborhoods. Then, they will commute to Downtown Honolulu on the City's reconfigured hub-and-spoke network system, as well as the proposed Bus Rapid Transit system.*

**Response:** We agree. This is consistent with what is proposed in the Refined LPA. In addition, there will be a park-and-ride at Aloha Stadium.

2. *There is a need to re-analyze and make more attractive the basic prerequisite that residents in outlying areas should utilize facilities like a park-and-ride in order to effectively reduce traffic on our freeways. If this is achieved, the high cost of providing parking and the necessary infrastructure can be avoided.*

**Response:** We agree. This is consistent with the goal of the Primary Corridor Transportation Project. The park-and-ride lots would work together with the Regional BRT and In-Town BRT to reduce parking needs and roadway infrastructure costs.

3. *It is my further contention that providing for additional parking in the Primary Urban Center will be contrary to the City's goal to minimize the current traffic gridlock because residents will not be encouraged to take alternative transportation from a destination point in their own neighborhoods in Leeward and Central Oahu. Unless the availability of parking is reduced in the Primary Urban Center, there is no incentive for our commuters to get out of their cars and thereby reduce traffic through the major bottlenecks on the major thoroughfares.*

The Honorable Romy Cachola  
Page 2  
November 13, 2002

**Response:** The Refined LPA does not include additional parking to be provided in the Primary Urban Center other than at transit centers as specifically identified in Chapter 2, Tables 2.2-2, 2.2-3, and 2.2-5 of the FEIS.

Part B - SDEIS Comments

4. *In addition to my previous letter dated November 6, 2000, which was not included in the original comments for the SDEIS, I wish to highlight three major areas of concern:*

1. *The Luapele Drive Ramp to H-1*
2. *Middle Street Transit Center*
3. *Dedicated Use of Lanes Along Dillingham Boulevard for the Bus Rapid Transit (BRT)*

**Response:** Your November 6, 2000 letter was received. The letter was in response to the MISDEIS and is included in the FEIS along with your May 8, 2002 letter. Responses to your comments regarding the Luapele Drive ramp, the Middle Street Transit Center, and dedicated lanes along Dillingham Boulevard are included in the Final Environmental Impact Statement (FEIS).

5. *Residents in the Salt Lake, Foster Village and surrounding communities are very much against this proposal due to lack of input from community associations, neighborhood boards and other affected parties.*

**Response:** We thank you for helping to facilitate meetings to address community concerns. Based on a presentation to the Aliamanu/Salt Lake Neighborhood Board in June 2002 and a subsequent meeting with the Aliamanu/Salt Lake/Foster Village Working Group formed at your request, we believe the residents of the surrounding communities now better understand what is being proposed and are not opposed to the project as reflected in the Refined LPA. We will continue discussions and communication with the community members throughout project design and implementation.

6. *They are also concerned with the level of noise, impact of traffic along Salt Lake Boulevard and Kanehameha Highway, and other possible negative impacts resulting from the Luapele Drive Ramp.*

**Response:** The noise (FEIS Section 5.6) and traffic effects (Chapter 4.0) associated with the Luapele Drive ramp are included in the FEIS.

7. *The existing egress and ingress to the Aloha Stadium parking lot from opposite sides is sufficient without having to incur additional expenses in the development of the Luapele Drive ramp.*

**Response:** The Aloha Stadium overflow parking area does not have direct access to H-1. The purpose of the Luapele Drive ramp is to provide direct access to the H-1 zipper lanes for Regional BRT buses. Access to the zipper lanes from this area would not be possible without the Luapele Drive ramp.

8. *Moreover, a working group of residents from Salt Lake and Foster Village was never formed to discuss the Luapele Ramp, which was a recommendation from a working group comprised of residents from Aiea and Pearl City. This working group was successful in deleting the Keonohi Street ramp and the Kanehameha Drive-In Transit Center in favor of the Luapele Ramp and*

expansion of the Stadium Transit Center. If a viable push for the Luapele Drive ramp continues, then residents in neighboring effected communities should be afforded the courtesy of establishing working groups and the opportunity to discuss the Luapele proposal.

Response: A Salt Lake/Foster Village Working Group was formed and their first meeting was July 24, 2002. We thank you for your assistance in this area and will continue to work with the community throughout design and project implementation.

9. The noise impact of the Luapele Drive ramp is based on the projected noise exposure of an unidentified single-family home located at Luaoie Place. The Luapele Drive ramp is projected to have in 2025 no noise impact on the home as measured according to Federal Transit Administration criteria.

A. Please identify the location of the home.

B. The discussion of noise impacts implies that the analysis was based on hybrid diesel/electric bus noise. Please clarify whether the noise analysis for the Luapele Drive ramp was based on hybrid or regular diesel bus noise. If the analysis was based on hybrid bus noise, the noise impact from regular diesel buses also should be discussed, at least for information in case the City acts slowly in procuring hybrid buses.

No discussion is provided on the noise impact of residences and businesses adjacent to Salt Lake Boulevard between Luapele Drive and the Aloha Stadium Transit Center. That section of Salt Lake Boulevard probably will experience additional bus trips. Please address the possible noise impact on such residences and businesses.

**Response:**

A. The single family home (SFR) where the measurement was taken is located on Luaoie Street, closest to H-1. The address of the home is 4508 Luaoie Place.

B. The Luapele ramp noise impact discussion in the SDEIS was based on both hybrid diesel/electric bus and on wayside-powered electric bus. The first number under the "Project Generated Noise" column represents the hybrid diesel/electric bus, and the second number in the column represents the wayside powered electric bus. See Table 5.6-2, Notes 2 and 3.

A diesel bus will generate approximately 5 to 7 dB higher noise levels than a hybrid. At Site 18, the single-family residence on Luaoie Place, the estimated noise levels with diesel bus vehicles would be an Ldn of 63 dBA, which will not result in a noise impact.

The operations of a transit center and its potential noise impact on the nearby Halawa Valley and Makahala residential communities have been assessed. The noise sources associated with the Aloha Stadium Transit Center: (1) on-site BRT vehicles idling within the Transit Center; and (2) the off-site movement of BRT vehicles and autos traveling to the Transit Center are included in the assessment. Twenty-four hour noise measurements were conducted at the nearest residential receiver to the transit center to determine the existing noise levels. To determine potential impact, the noise levels of the transit center operations were compared to the existing noise levels using the FTA Noise Impact Criteria. The results of the analysis are presented in the FEIS, Section 5.6.

10. The table below lists the projected levels of service at intersections near the Luapele Drive ramp for all alternatives during the a.m. and p.m. peak hours in 2025. [The table referenced is Table 4.2-7 on page 4-19 of the SDEIS]. Two questions arise from the data:

A. Why are the levels of service under the Refined BRT Alternative the same as or better than the levels under the No-Build Alternative and TSM Alternative? Both the No-Build Alternative and TSM Alternative do not have the Luapele Drive ramp. Consequently, those Alternatives should not have the associated bus and high occupancy vehicle traffic projected under the Refined BRT Alternative.

B. Why are there differences between the levels of service of auto and transit? Autos and buses will operate in mixed traffic lanes. Logically then, buses should not have an advantage over autos.

**Response:**

A. The Luapele Drive ramp to the H-1 will only be utilized by regional BRT vehicles and would not be open to private vehicles. Auto LOS at the Salt Lake Boulevard/Kahuapaani Street intersection is projected to be better in the Refined LPA because it includes geometric enhancements at this intersection.

B. LOS of private vehicles at an intersection is a weighted average of all lanes and movements associated with an approach. For transit LOS, only the specific lane and approach that the BRT would travel on is considered for the LOS. Note that no change in transit LOS is projected between the three Alternatives.

11. Approximately 20 buses in each direction are projected as running through the Luapele Drive ramp during the peak hour in 2025.

For the former Keonohi ramp, some express buses from Leeward and Central Oahu traveling town-bound in the a.m. peak period were to exit the zipper lane at the ramp, access the former Pearlridge transit center, and then re-enter the zipper lane. The reverse movement was to occur in the p.m. peak period. Please provide a discussion of whether the express buses will use the Luapele Drive ramp in the same manner.

Response: The Luapele Ramp is oriented only in the peak direction of travel: Inbound to Downtown in the morning and outbound from Downtown in the afternoon. There will be no exit to transit center and re-enter zipper lane operation of the BRT vehicles at the Luapele Ramp. The purpose of the Luapele Ramp is to provide access to and from the zipper lane east of Aloha Stadium. The regional BRT vehicles that use the Luapele ramp would be on Kamehameha Highway and Farrington Highway, west of Aloha Stadium. Other than the regional BRT vehicles, only Route A-CityExpress vehicles are proposed to use the Luapele Ramp.

12. Table 3.1-3 of the Draft Technical Memorandum On Estimated Operating and Maintenance Costs, Draft Product 7-20 dated August 1999, lists the different bus routes for the original BRT Alternative. Please provide a similar table for the Refined BRT Alternative so that the layperson may better understand the planned bus movements for the Luapele Drive ramp.

Response: See response to comment #11. Primarily regional BRT vehicles will access the Luapele ramp.

13. In addition, neither the SDEIS nor the MISDEIS discusses the impact of the Aloha Stadium transit center/park-and-ride facility on traffic at the adjacent intersection. No level of service analysis is provided for the Kamehameha Highway/Salt Lake Boulevard intersection, although logic dictates that more buses and autos will use the transit center/park-and-ride facility than under the No-Build or TSM Alternative.

**Response:** The Aloha Stadium park and ride facility is an independent project already identified on the Transportation Improvement Program (TIP). A separate environmental document will be prepared for that project. The transit center would increase parking needs at the facility, since it would help to intercept more vehicles. Traffic increases on Kamehameha Highway were found to be minimal. Traffic was found to increase on Salt Lake Boulevard, but this traffic would be intercepted by the Aloha Stadium transit center/park and ride facility before reaching Kamehameha Highway. The Kamehameha Highway/Salt Lake Boulevard intersections will be improved as part of the Ford Island Redevelopment effort. The park and ride and the transit center teams will continue coordinating with U.S. Navy representatives regarding the combined effects of the projects at this location.

14. Also, neither the SDEIS nor the MISDEIS discusses the noise impact of the Aloha Stadium transit center/park-and-ride facility. Please address the noise impact of the Aloha Stadium transit facility on the nearby Halewa Valley and Makena Manor residential communities.

**Response:** The operations of the Aloha Stadium Transit Center and its potential noise impact on the nearby Puuwaia (Momi) and Halewa Valley residential communities have been assessed and will be included in Section 5.6 of the FEIS. The noise sources associated with the transit center that were considered in the assessment are: (1) on-site BRT vehicles idling within the transit center, and (2) the off-site movement of BRT vehicles and autos traveling to the transit center. The projected transit center noise levels considered both the electric and hybrid diesel/electric vehicles. The noise impact from electric vehicles would be less than that from the hybrid diesel/electric vehicles.

15. Widening - Despite plans to widen the H-1 freeway near the Luapele Drive ramp, the SDEIS is silent on the necessity for acquiring property for the widening. Please include a statement on whether property will have to be acquired for the widening. If acquisition is necessary, please identify the property.

**Response:** As stated in FEIS Section 2.2.3, the widenings of the H-1 freeway will be done within the existing H-1 right-of-way.

16. Military Property - The Luapele Drive ramp is also near military property in Makena. Please address whether the ramp will impact military property.

**Response:** The ramp is contained within the H-1 freeway right-of-way.

17. Profile Sketches - The profiles of the Luapele Drive ramp in appendix B of the SDEIS do not clearly show where and how the ramp will rise from Luapele Drive to the H-1 freeway. Please provide profile sketches from different ground level views that are understandable by the layperson.

**Response:** The FEIS includes conceptual designs of the Luapele Ramp, including how it will connect to the H-1 Freeway. These were also presented at the July 24, 2002 Allamanu/Salt Lake/Foster Village Working Group meeting.

18. As we discussed in an earlier meeting, I am against purchasing private property on the Ewa side of the OCCC, specifically the Gaspro site on the makai end of Dillingham Boulevard for the Keiiki Kai Transfer Center. The most optimal and cost effective solution for an in-town BRT would be to consolidate all operations at the Middle Street Center.

**Response:** The BRT system described in the FEIS includes a consolidated BRT. The Bus and Therand-Van operation and maintenance yard at the Middle Street Transit Center, although there are other properties that provide connections from the State's Nimitz Highway project that are still worthy of review.

19. A major concern of the Middle Street facility is some business displacements, perhaps up to a maximum of 17 businesses as a result of expanding the Middle Street Transit Center and extending Kaahiki St. for the In-Town Transit Center. Neither the SDEIS nor MIS/DEIS, however, identifies the businesses to be displaced or the property to be taken. Nor does either document break down the number of displacements between the Middle Street facility and In-Town Transit Center.

**Response:** Please provide a list of businesses to be displaced by the Middle Street facility expansion. The list also should include businesses to be partially displaced, if any, by the Middle Street expansion.

**Response:** The FEIS Section 5.2 discloses all the names of the businesses that would be relocated as a result of the project; however, the Middle Street maintenance facility and transit center are being developed as a separate project and the associated relocations are disclosed in a separate Environmental Assessment.

20. Some members of the public have expressed concerns about having only one general-purpose lane in each direction on Dillingham Boulevard. The limited number of general-purpose lanes is the result of the dedication of the median lanes exclusively for In-Town BRT vehicles.

**Response:** In addition to the BRT exclusive lanes, there will be at least one general purpose lane in each direction plus turn lanes along Dillingham Boulevard. The general purpose lanes on Dillingham Boulevard will be 18-feet wide between Puuhale Street and Waialakamio Road. These extra wide lanes will permit motorists to go around local buses stopped to pick-up and drop-off passengers and vehicles turning right without having to encroach into the exclusive BRT lanes. Between Waialakamio Road and Kaaahiki Street the general purpose lanes will be 13-feet wide with bus turnouts at local bus stops so that the flow of other vehicles will be uninterrupted.

21. Despite the exclusive lanes, the transit travel time between Downtown and Keiiki of an In-Town vehicle is not substantially less than the bus travel times under the No-Build and TSM Alternatives. Neither of those Alternatives includes special treatment for buses on Dillingham Boulevard. The following presents "composite" peak period travel time data [the SDEIS does not explain why "composite" travel time is used or how "composite" travel time is determined.] from Table 4.1-6 on page 4-7 of the SDEIS. The "Downtown" location is the "Fort Street Mall between Hotel & King" and the "Keiiki" location is the area bounded by "Waialakamio/Keiiki / Dillingham/McNair" [sic] [See the response to question (25) (B) on page 17 of Communication D-840 2000.]

DOWNTOWN TO KALIHI  
IN-VEHICLE TRANSIT "COMPOSITE" PEAK PERIOD  
TRAVEL TIME (in 2025)

	No-Build	TSM	Refined BRT
Downtown to Kalihi	7.9 minutes	6.8 minutes	5.1 minutes

The differences in travel times among the Alternatives are not major. An In-Town BRT vehicle in the exclusive lane is projected to be faster by about 1.7 minutes than a bus in a general-purpose lane under the TSM Alternative. Compared to the No-Build, the In-Town BRT vehicle is projected to be faster by 2.8 minutes.

Response: Table 4.3-5 in the FEIS replaces this table. Table 4.3-5 summarizes projected year 2025 p.m. peak hour total transit travel time. Total transit travel time includes out of vehicle time (wait, walk and transfer). In Table 4.3-5, the travel time between Downtown and the Middle Street Transit Center is 17.9 minutes for the No-Build, 16.3 minutes for the TSM, and 13.3 minutes for the Refined LPA. This reflects a Refined LPA travel time advantage of 4.3 and 3.0 minutes over the No-Build and TSM alternatives, respectively. While these differences may seem small, they reflect significant differences in average transit speed. Given the approximately 3 mile distance between Middle Street Transit Center and Downtown, the average transit speeds would be 10.2 mph, 11.04 mph, and 13.5 mph for the No-Build, TSM, and Refined LPA, respectively. Over a longer trip, the differences in transit speeds would result in a significant advantage for the Refined LPA. Additionally, without this key segment between Downtown and the Middle Street Transit Center, the reliability of the transit schedule could not be maintained.

22. A statement in the SDEIS suggests that a relatively small difference in travel time may not have a significant effect. "Based on past model results, a two- to five-minute increase in travel time should not have a significant effect on transit ridership." See the second full paragraph on page 4-3 of the SDEIS.

(A) Please provide a discussion on whether the costs of construction and operation of the exclusive lanes on Dillingham Boulevard are worth the travel time savings between Kalihi and Downtown.

(B) Additionally, please provide the travel time for an In-Town BRT vehicle assumed to be operating in a general-purpose lane in the same manner as a bus under the No-Build and TSM Alternatives. Under the scenario, two general-purpose lanes in each direction on Dillingham Boulevard should be assumed. The information is intended to reveal the extent of the advantage of the exclusive lanes over general-purpose lanes.

(C) The auto travel time between comparable points of the "Downtown to Kalihi" trip by the fastest route should be provided for each Alternative.

Response:

(A) The travel time savings on BRT from Kalihi to Downtown is significant, 24 percent savings over the No-Build. But more importantly, the BRT will be able to provide reliable and consistent travel times because of the exclusive and priority treatments while the No-Build and TSM Alternative services on Dillingham Boulevard may be subjected to schedule disruptions due to

congestion. Exclusive lanes and other priority treatments on Dillingham Boulevard are more critical than on other segments that are now proposed to have the BRT operate in semi-exclusive lanes.

(B) The BRT vehicles in exclusive lanes are estimated to operate with an average speed that is 33 percent faster than buses in general-purpose lanes. The key advantage of the exclusive lane is not only improvements on the operating speed, but its ability to maintain the speed regardless of the traffic conditions in the adjacent general purpose lanes.

(C) The auto travel time is not presented in the FEIS. However, the indicators that are commonly used to evaluate traffic conditions on roadways, traffic delays and Level-of-Service, are presented for Dillingham Boulevard in Table 4.4-5.

23. In response to concerns about potential motorist delays from only one 14-foot general purpose lane in each direction, the Kaihi Working Group has recommended the widening of each lane to 18 feet between Laumaka Street and Welakamao Road. Sidewalk widening and additions also are planned.

Response: The Refined BRT reflects these changes.

24. The SDEIS is silent regarding any other possible negative impact from the widening of Dillingham Boulevard or addition of new sidewalks. It does not expressly indicate whether any private or other property must be acquired for the widening or new sidewalks or whether abutting property will be affected in any other manner.

Response: See response to comment #16. Although roadway improvements from constructing the In-Town BRT lanes will affect certain parcels, the specific impacts will be limited to driveway adjustments, parking, and landscaping losses. These impacts are identified in the FEIS.

25. Please provide a narrative describing or map depicting the following: (1) the specific Dillingham Boulevard sections to be widened for general-purpose lanes, sidewalks, or both; and (2) the specific sections of Dillingham Boulevard where new sidewalks will be added.

Response: The Preliminary Engineering drawings in Appendix B show the specific Dillingham Boulevard sections to be widened for general purpose lanes, sidewalks, or both; and specific locations along Dillingham Boulevard where new sidewalks will be added.

26. One impact presumably from the widening are some driveway impacts and the loss of one or two parking stalls for Kapalama Makai, an apartment complex on the corner of Dillingham Boulevard and McNeill Street. Please discuss any mitigation measure for Kapalama Makai.

Response: We will work with the owners to replace displaced parking and landscaping on the property.

27. Moderate noise impacts are expected at only one location along the Dillingham Boulevard alignment, the Bishop Garden Apartments. The impact is projected with the hybrid diesel/electric vehicles, but not the embedded plate propelled vehicles. The Bishop Garden Apartments is near the Dillingham Boulevard / Welakamao Road intersection. Notwithstanding the impact, noise mitigation is not deemed to be feasible and not planned to be included as part of the Refined BRT Alternative.



**CITY COUNCIL**  
CITY AND COUNTY OF HONOLULU  
HONOLULU, HAWAII 96813-3065 / TELEPHONE 847-7000

An explanation should be provided on the reason noise mitigation for the Bishop Garden Apartments is not feasible. The explanation should address whether the construction of sound walls at the front property line of the Apartments was considered as a mitigating measure.

Response: According to the Federal Transit Administration's Transit Noise and Vibration Impact Assessment (April 1995), mitigation of moderate noise impacts, which represent a noticeable but not significant change in noise levels, may not be required upon consideration of project-specific factors such as cost and feasibility.

At the Bishop Garden Apartments, where a moderate noise impact has been projected under the Refined LPA using hybrid diesel/electric vehicles, noise mitigation was analyzed and determined not to be feasible. At this location, the BRT would run in the center of the street. Mitigation in the form of a sound-absorptive noise wall would only be effective if the wall is located directly along the edge of the BRT lane in the center of the street, where it could effectively reduce the source of the noise generated by the BRT vehicle. However, construction of a wall in the center of the Dillingham Boulevard would not only obstruct traffic movements but would also impair driver visibility. Furthermore, a wall in the center of Dillingham Boulevard would be an eyesore to the community. Constructing a noise barrier along the property line of the Bishop Garden Apartments would also not be feasible because the barrier would need to leave gaps to allow vehicle access to the property from Dillingham Boulevard, which would not mitigate the noise. For these reasons, mitigation at the Bishop Garden Apartments has been determined not to be feasible.

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

FORWARDED:

  
BENJAMIN B. LEE, FAIA  
Managing Director

GARY H. OKINO  
COUNCILMEMBER, DISTRICT VIII  
CHAIR, PLANNING COMMITTEE  
TELEPHONE 808 247-7008  
FACSIMILE 808 923-4220

May 7, 2002

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, HI 96813

Dear Ms. Soon:

Re: Primary Corridor Transportation Project  
Supplemental Draft Environmental Impact Statement

Attached are comments, questions, and concerns on the Supplemental Draft Environmental Impact Statement for the Primary Corridor Transportation Project, dated March 2002.

The Department of Transportation Services is to be commended for its efforts to increase the carrying capacity of our public transportation system and to improve the transportation linkages between and within outlying communities and Honolulu's Urban Core. Implementation of the Bus Rapid Transit (BRT) concept could be a means to achieve these goals. However, before the City moves forward with the Primary Corridor Transportation Project, concerns regarding the capital and operating and maintenance financing plans must be addressed and a balanced disclosure of the benefits and detriments of the Refined BRT Alternative must be provided.

I thank you for the opportunity to submit these comments and concerns, and trust that they will be included and appropriately analyzed in the forthcoming Final Environmental Impact Statement.

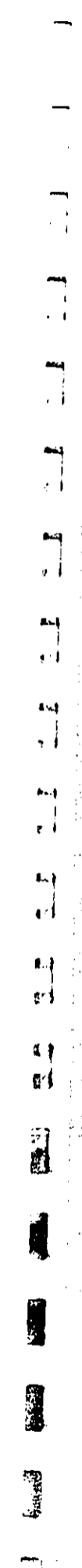
Sincerely,

Gary H. Okino  
Councilmember, District VIII

Attachment

C: Governor Benjamin J. Cayetano  
Ms. Genevieve Salmonson

TRANSPLANNING  
MAY 7 3 03 PM '02



May 7, 2002

COMMENTS ON THE SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT  
FOR THE PRIMARY CORRIDOR TRANSPORTATION PROJECT (SDEIS)

Unless otherwise specified, references to pages, tables, and figures mean those in the SDEIS.

Communication D-840 (2000), to which the following refers, is attached.

CHAPTER 2 ALTERNATIVES CONSIDERED

Inadequacy Of TSM Alternative

(1) The Refined BRT Alternative is compared to the TSM Alternative described in Chapter 2 of the SDEIS.

The TSM Alternative is inadequate as the lower-cost baseline against which the Refined BRT Alternative should be compared. The inadequacy appears to produce an advantage for the Refined BRT Alternative in a comparison of transit benefits.

Major inadequacies of the TSM Alternative are the following:

- (A) Lack of P.M. Zipper Lane -- Unlike the Refined BRT Alternative, the TSM Alternative does not include the P.M. contra-flow zipper lane on the H-1 freeway from Radford Drive to the Waialae Interchange. The lack of a P.M. zipper lane appears to negatively affect the transit travel times in the P.M. peak from Downtown to some Leeward Oahu sites under the TSM Alternative.
- (B) Lesser Bus Service -- The TSM Alternative has less bus service than the Refined BRT Alternative. "Bus service" refers to service provided by minibuses, standard buses, and articulated buses, but not In-Town BRT vehicles. The following table compares the bus service under the original BRT Alternative and TSM Alternative. Comparison with the original BRT Alternative is necessary because of the unavailability of "bus service" data for the Refined BRT Alternative.

COMPARISON OF "BUS SERVICE"  
UNDER ORIGINAL BRT ALTERNATIVE AND TSM ALTERNATIVE  
IN 2025

	Original BRT Alternative	TSM Alternative
Number Of "Buses" (Minibuses, Standard Buses, Articulated Buses, But Not In-Town BRT Vehicles)	730	601
Annual "Bus" Revenue Miles	26,303,500	20,740,000
Annual "Bus" Revenue Hours	1,688,300	1,400,000

Sources: For the original BRT Alternative, table 2.2-6 on page 2-18 of the DEIS and the response to question (22) on page 15 of Communication D-840 (2000). For the TSM Alternative, table 4.1-1 on page 4-3 of the SDEIS.

(C) Insufficient "Semi-Exclusive" Bus Lanes -- The TSM Alternative does not have enough "semi-exclusive" bus lanes. For the Alternative, the third paragraph on page 2-15 of the DEIS states in part:

Semi-exclusive bus lanes would be placed on King Street and Beretania Street, between Middle Street and Waialae Avenue. (Semi-exclusive bus priority lanes are lanes that would be reserved for buses, although vehicles turning into and out of driveways and turning right at intersections would be permitted to use them.) These bus priority facilities would generally operate only during peak periods.

"Semi-exclusive" lanes apparently are beneficial for fast transit travel times. Illustrative of this point is that "semi-exclusive" lanes will comprise "29 percent" of the In-Town BRT alignment. See the last paragraph on page 2-11 of the SDEIS.

If "semi-exclusive" lanes are beneficial for the In-Town BRT system, then they also should be beneficial for buses under the TSM Alternative. More "semi-exclusive" bus lanes under the TSM Alternative may have resulted in better transit travel times for patronage forecasting and, consequently, increased transit



ridership.<sup>1</sup>

Lack Of In-Town BRT Connection Between Waikiki And Convention Center

(2) The In-Town BRT system does not directly connect Waikiki and the Convention Center. The omission seems inconsistent with the need to make the Convention Center more attractive to convention planners and attendees by providing better transit from Waikiki hotels.

In fact, the SDEIS and DEIS ignore the Convention Center as a trip attraction, despite its importance to the State economy. Table 3.3-6 on page 3-32 of the SDEIS does not list the Convention Center among the "major activity sites in the primary urban center DP area." Table 5.1-1 on page 5-4 of the SDEIS does not list the convention center among the "major destinations in the primary urban center." Moreover, the "screening of alternatives," commencing on page 2-41, of the DEIS does not even mention the Convention Center.

An explanation of the reason for the absence of an In-Town BRT connection between Waikiki and the Convention Center should be provided.

The response to question (20) (B) on page 14 of Communication D-840 (2000) indicates that a grade separation at the Kalakaua/Kapiolani intersection will be necessary to make the connection work. If that response is repeated, elaboration should be provided.

Pearl City/Aiea Working Group's Recommendations

(3) The first paragraph on page 2-9 summarizes the recommendations of the Pearl City/Aiea Working Group. Basically, the Working Group recommends that transit centers be established in Pearl City and Aiea and that contra-flow bus operation during the peak periods link the transit centers with the Regional BRT at Luapele Drive. The paragraph also states: "The DTS is programming these projects into the City Capital Improvement

<sup>1</sup>Other streets, including Kapiolani Boulevard and Kuhio Avenue, will have "bus priority" lanes instead of "semi-exclusive" lanes. "Bus priority" lanes will have signal and other treatments favoring buses without restricting lane use.

Program (CIP) as separate projects from the BRT since they have independent utility."

The transit service recommended by the Pearl City/Aiea Working Group will serve the area being evaluated under the Primary Corridor Transportation Project. The capital cost, operating and maintenance cost, and transit ridership resulting from the recommendations should be included in the FEIS for the Refined BRT Alternative. Such data are necessary to display the system-wide costs and benefits.

Enforcement Of "Exclusive" And "Semi-Exclusive" In-Town BRT Lanes

(4) The last paragraph on page 2-11 and first paragraph on page 2-12 states: "Along about 38 percent of the its length, the In-Town BRT system would run in transit lanes in the median of existing arterial roads (e.g., sections of Kapiolani and Dillingham Boulevards). Along 29 percent of the alignment, the system would run along the curb in semi-exclusive lanes. Semi-exclusive lanes would be shared with right-turning vehicles, and in the case of Waikiki with other buses (public and private) and trolleys. For the remaining one-third of the alignment the BRT would operate in mixed traffic."

A description should be provided of the plan to enforce proper use of the "exclusive" and "semi-exclusive" lanes. Enforcement appears imperative if the In-Town BRT vehicles are to achieve fast travel times.

Better Justification For Differentiation Between "Semi-Exclusive" Lane And "Mixed Traffic" Lane

(5) A "semi-exclusive" lane apparently is intended to enable faster transit travel times than a "mixed traffic" lane. For practical purposes, however, both a "semi-exclusive" lane and "mixed traffic" lane will be usable by In-Town BRT vehicles and other types of vehicles, including autos. If the proper use of a "semi-exclusive" lane is not constantly enforced, then there will be no difference from a "mixed traffic" lane.

Better justification should be provided for differentiating between a "semi-exclusive" lane and "mixed traffic" lane. If there will be no difference under actual operational conditions, then all lanes not exclusive to In-Town BRT vehicles should be

deemed "mixed traffic" lanes in the FEIS and designated "general purpose" lanes in Table 2.2-4 on Page 2-21.

Justification For Better Transit Operation On "Semi-Exclusive" Lane Than Current De Facto Operation

(6) The 1990 AA/DEIS for the rapid transit project designates "exclusive transit lanes" on certain urban streets. Concerning the operation of those lanes, the Department of Transportation Services in 1990 responded to certain questions submitted by the Council. See page 2 of Communication D-558 (1990), Managing Director's reference "MD-7-03138."

Basically, the 1990 responses indicate that a street lane reserved for buses and right-turning vehicles would not result in bus travel times faster than under "current" operation. The following are the questions and responses:

(3) On page 2-4, in figure 2.1 of the AA/DEIS, exclusive transit lanes are depicted on Beretania Street, Alakea Street, King Street, Kapiolani Boulevard, and Kalakaua Avenue.

(A) Please describe the planned operation of the exclusive transit lanes, especially during the peak periods.

The exclusive transit lanes depicted on Beretania Street, Alakea Street, King Street, Kapiolani Boulevard, and Kalakaua Avenue are a formalization of the de facto exclusive bus lanes currently in operation. The exclusive bus lanes will be in effect for the peak period and in the peak direction only. They will be for the exclusive use of buses and right-turning vehicles. (Underscoring added)

(B) Under the operating plans of all alternatives, is transit travel time in buses based on the use of the exclusive transit lanes?

\* The "de facto" operation refers to the situation under which the right lane of a street is used only or mainly by buses and right-turning vehicles. Through-moving vehicles generally prefer and use other lanes to avoid the frequent stops and slow speeds of buses in the right lane.

The transit travel time in buses using the exclusive transit lanes would not change because there would be no speed change as compared to the de facto condition. (Underscoring and footnote added.)

Similar to the designated transit lanes in the 1990 AA/DEIS, the "semi-exclusive" lanes for the In-Town BRT system "would be shared with right-turning vehicles, and in the case of Waikiki with other buses (public and private) and trolleys." See the first paragraph on page 2-12 of the SDEIS.

Based on the Department of Transportation Services' 1990 responses then, an In-Town BRT vehicle using a "semi-exclusive" lane should experience "no speed change as compared to the de facto condition" under current operation. The current condition for buses on roadways and highways is described in the last paragraph on page 1-12 of the SDEIS. The decline of the average operating speeds of buses is described in the fourth paragraph on page 3-16 of the SDEIS.

A discussion should be provided on whether an In-Town BRT vehicle in a "semi-exclusive" lane is expected to operate at a faster speed than a bus currently operating in the right lane. If the contention is that the In-Town BRT vehicle will be faster, the reason for the departure from the above quoted 1990 responses should be specified.

Circulator Bus Routes On Refined BRT Alternative Alignment

(7) The response to question (3) (A) on page 2 of Communication D-840 (2000) addresses bus routes under the original BRT Alternative. It states in part: "Circulator services would also be offered along the BRT route to serve passengers who find the station spacing of the BRT inconvenient for their trip."

The statement or a similar one should be added to the bus route description for the Refined BRT Alternative on page 2-5 of the SDEIS. A discussion also should specify whether the circulator bus service will be provided on portions of the In-Town BRT alignment where only one general purpose traffic lane will be available per direction. The discussion also should explain the 0 or very few "bus arrivals" at In-Town BRT stations

on Dillingham Boulevard, the King Street section Koko Head of the Alapai stop, the Kapiolani Boulevard section Ewa of the Isenberg stop, and Kuhio Avenue. See Table 4.1-8 on Page 4-9.

Selection Of In-Town BRT Technology

(8) The first paragraph on page 2-25 discusses the "final technology selection for In-Town BRT." A portion reads: "During the next year or so, it is anticipated that both the embedded plate and hybrid diesel/electric technologies will advance to a state where they will be considered service proven. At that time, a decision on technology may be made."

(A) A "year or so" does not seem sufficient to determine whether a technology really is "service proven." Support should be provided for the contention that a technology can be "service proven" so soon. A technology also should be provided of the factors a technology must comply with in order to be considered "service proven."

(B) The City Administration is requesting design and construction funds for the In-Town BRT system in the fiscal year 2002-03 capital budget bill, although a technology has not been selected as yet. A justification of the funding request should be provided.

(C) A description of the roadway construction work necessary for each technology should be provided. Responses to question (37) on pages 23 and 24 of Communication D-840 (2000) summarize well the work needed for the embedded plate technology and hybrid propulsion technology. More construction work appears to be necessary for the embedded plate technology.

Justification For Design/Construction Appropriation Request For "Iwilei To Waikiki" In-Town BRT Segment Rather Than "Kalihi Segment"

(9) Figure 2.5-1 on page 2-27 shows the project implementation schedule. The "Kalihi segment," "Waikiki segment," and "Kakaako Makai segment" of the In-Town BRT system are programmed to commence in 2002.

In the fiscal year 2002-03 capital budget bill, however, the City Administration is requesting design and construction appropriations for the "Iwilei to Waikiki alignment."

An explanation should be provided on why funding is not being requested for the "Kalihi segment" in the fiscal year 2002-03 capital budget bill. The "Kalihi segment" seems the obvious starting point since Middle Street will serve as the beginning of the alignment and storage/maintenance yard for In-Town BRT vehicles.

Starting at Middle Street appears to be necessary for the embedded plate technology. The first full paragraph on page 5-3 states: "Additionally the embedded plate vehicles need to travel in the transit lane where the embedded plates are located (other than for short distances where battery back-up can be used)."

In-Town BRT Project Schedule

(10) Figure 2.5-1 on page 2-27 shows that the "Waikiki segment" and "Kakaako Makai segment" are programmed to be commenced and completed earlier than the "Midtown-UH segment" and "Kakaako Mauka segment." This seems disjointed.

An explanation should be provided on why the In-Town BRT segments are not programmed for completion in continuous segments from Middle Street.

CHAPTER 4 TRANSPORTATION IMPACTS

Calculation Of "Two Roadway Lanes In Each Direction"

(11) The last paragraph on page 4-1 states: "The Refined BRT Alternative would improve the person carrying ability within the Urban Core by an average of 11 percent over the No-Build Alternative. To get an equivalent increase in general-purpose throughput, two roadway lanes in each direction would need to be provided in the Urban Core, which is impossible to do without major displacements." The method of calculating the "two roadway lanes in each direction" is not included in the SDEIS or Travel Forecasting Results Report.

<sup>3</sup> Parsons Brinckerhoff Quade & Douglas, Inc., prepared for the City Department of Transportation Services.

Experimentation indicates that the calculation is based on the data in table 4.2-1 on page 4-12, concerning the "projected 2025 A.M. peak hour person carrying capacity at selected screenline locations," the average occupancy of an auto, and the capacity of a freeway lane designed for a speed of 50 miles per hour at level of service E.

The statement that the No-Build Alternative will require "two roadway lanes in each direction" is inappropriate for a technical document. The calculation method is not provided and the imagery of a three-dimensional four-lane highway is a misrepresentation.

See attachment B for elaboration.

Ridership Of "Kakaako Makai" Branch Of In-Town BRT

(12) The second paragraph on page 4-5 states: "The Kakaako Makai Branch of the Refined BRT would account for 7,400 of the In-Town BRT daily trips, or about 9 percent of the total BRT boardings." The last paragraph on page 4-2, however, states: "This [Kakaako Makai Branch] alignment, beginning at the Iwilei Transit Center with a terminus in Waikiki would add approximately 3,700 transit boardings per day to the total transit boardings for the In-Town BRT."

The discrepancy in the Kakaako Makai Branch trips should be clarified.

"Composite" Transit Travel Times

(13) The fourth paragraph on page 4-6 describes table 4.1-6 on "transit travel times within the urban core." A sentence reads: "These travel times are a composite of A.M. and P.M. peak period time in each corridor."

Technical Memorandum On Travel Forecasting Results, Product 7-19, October 2000.

The formula appears to be as follows: Number Of Lanes = ((Refined BRT Alternative Person Carrying Capacity Across Screenlines In Table 4.2-1 - No-Build Alternative Person Carrying Capacity Across Screenlines In Same Table) \* 1.4 Average Persons Per Auto Occupancy) + 1,900 Passenger Cars Per Hour Per Lane Of Capacity Of One Freeway Lane Designed For 50-MPH At Level Of Service E.

An explanation should be provided of (A) how "composite" travel time was determined and (B) why "composite" travel time was used.

More importantly, table 4.1-6 should provide the "non-composited" A.M. peak and P.M. peak transit travel times for each of the origin-destination pairs.

"Downtown To Kapolei" Transit Travel Times

(14) Table 4.1-6 on page 4-7 shows the "Downtown-Kapolei" transit travel times in 2005 for the Alternatives. The following are the travel times.

IN-VEHICLE TRANSIT TRAVEL TIMES  
DOWNTOWN TO KAPOLEI  
IN PEAK PERIOD  
(In 2025)

Downtown To Kapolei	No-Build	TSM	Refined BRT
	53.7 minutes	45.5 minutes	36.8 minutes

Source: Table 4.1-6 on page 4-7 of the SDRIS.

The title of table 4.1-6 indicates that it provides "in vehicle time," apparently meaning only the time spent riding a transit vehicle. If that interpretation is correct, then transfer time is not included in the table.

Logic indicates that the "Downtown to Kapolei" trip under the Refined BRT Alternative will require a transfer at the Middle Street transit center from an In-Town BRT vehicle to an express bus. Logic also indicates that the same trip under the No-Build Alternative and TSM Alternative will not require a transfer. A person is assumed able to ride an express bus directly from Downtown to Kapolei under either Alternative.

The response to question (23) (D) on page 15 of Communication D-840 states that, under the patronage forecasting methodology, a "transfer penalty of 6 minutes was used." A six-minute transfer

\* "Downtown" is the approximate area of "Fort St. Mall between Hotel & King" and "Kapolei" is the residential area bounded by Farrington/Kaalaani/Kamahaui/Ft. Barrite. See the response to question 23(D) on page 17 of Communication D-840 (2000).

time appears reasonable for a P.M. outbound trip because of the longer express bus headways, but too much for an A.M. inbound trip because of the two-minute In-Town BRT headways. Thus, in the following, a range of two to six minutes, signifying transfer time, is added to the in-vehicle travel time for the Refined BRT Alternative.

**TRANSIT TRAVEL TIMES  
DOWNTOWN TO KAPOLEI  
IN PEAK PERIOD  
(In 2025)**

	No-Build (In-Vehicle Time)	TSM (In-Vehicle Time)	Refined BRT (In-Vehicle Time Plus 2- To 6-Minute Transfer Time)
Downtown To Kapolei	53.7 minutes	45.5 minutes	38.8 to 42.8 minutes

Table 4.1-6 should include the transfer time for the "Downtown to Kapolei" trip under the Refined BRT Alternative. If the times in the above table are correct, they should be included in the FEIS. If not, the correct times should be provided.

"Downtown To Waikiki" Transit Travel Times

(15) Table 4.1-6 on page 4-7 shows the "Downtown-Waikiki" transit travel times in 2005 for the Alternatives. The times are about the same for the TSM Alternative and Refined BRT Alternative.

\* "Downtown" is the approximate area of "Fort St. Mall between Hotel & King" and "Waikiki" is the approximate area bounded by Kalanika'opuole/Kalanika'opuole Lane." See the response to question 25(B) on page 17 of Communication D-840 (2006).

**IN-VEHICLE TRANSIT TRAVEL TIMES  
DOWNTOWN TO WAIKIKI  
IN PEAK PERIOD  
(In 2025)**

	No-Build	TSM	Refined BRT
Downtown To Waikiki	18.7 minutes	15.8 minutes	15.7 minutes

Source: Table 4.1-6 on page 4-7 of the SDGIE.

The routes of the "Downtown-Waikiki" trip under the No-Build Alternative and TSM Alternative should be described. Of interest is whether the routes operate in a limited stop or trunk route manner.

"Downtown To Kalihi" Transit Travel Times

(16) Table 4.1-6 on page 4-7 shows that the "Downtown-Kalihi" transit travel times in 2005 for the Alternatives. The times are about the same.

**IN-VEHICLE TRANSIT TRAVEL TIMES  
DOWNTOWN TO KALIH  
IN PEAK PERIOD  
(In 2025)**

	No-Build	TSM	Refined BRT
Downtown To Kalihi	7.9 minutes	6.8 minutes	5.1 minutes

Source: Table 4.1-6 on page 4-7 of the SDGIE.

(A) The routes of the "Downtown-Kalihi" trip under the No-Build Alternative and TSM Alternative should be described. Of interest is whether the routes operate in a limited stop or trunk route manner.

(B) A discussion should be provided of the transit travel time under the Refined BRT Alternative if Dillingham Boulevard is assumed to have two general-purpose lanes in each direction instead of one exclusive In-Town BRT

\* "Kalihi" is the approximate area bounded by Waikamilo/Kalihi/Dillingham/McNeill." See the response to question 25(B) on page 17 of Communication D-840 (2006).

lane/one general-purpose lane in each direction. The intent is to examine whether an In-Town BRT vehicle will lose substantial travel time if operating in a general-purpose lane.

"Downtown To UH-Manoa" Transit Travel Times

(17) The following table compares the in-vehicle transit travel times from Downtown to UH-Manoa\* for the Alternatives under the SDEIS and the Travel Forecasting Results Report.

COMPARISON BETWEEN SDEIS AND TRAVEL FORECASTING RESULTS REPORT  
IN-VEHICLE TRANSIT TRAVEL TIMES  
DOWNTOWN TO UH-MANOA  
IN 2025

	No-Build	TSM	BRT
SDEIS (Composite Peak Period)	27.8 minutes	23.7 minutes	14.2 minutes
Travel Forecasting Results Report (P.M. Peak Period)	13.7 minutes	13.7 minutes	12.6 minutes

Sources: Table 4.1-6 on page 4-7 of the SDEIS. Table 4-6 on page 4-5 of the Travel Forecasting Results Report.

The correct "Downtown to UH-Manoa transit travel times should be provided in table 4.1-6. An explanation for the discrepancy also should be provided.

"Downtown To UH-Manoa" Bus Route Under TSM Alternative And No-Build Alternative

(18) Table 4.1-6 on page 4-7 does not describe the bus routes from "Downtown to UH-Manoa" for the No-Build Alternative or TSM Alternative.

The routes of the "Downtown to UH-Manoa" bus trip under the No-Build Alternative and TSM Alternative should be described. Of interest is whether the routes operate in a limited stop or trunk route manner with or without a transfer at University Avenue to

\* "UH-Manoa" is the "U.H. Upper Campus." See the response to question (25)(B) on page 17 of Communications D-840 (2000).

the UH campus.

Comparable Bus-Only Transit Travel Times

(19) Much of the transit ridership and costs of the Refined BRT Alternative is due to the increased bus fleet and service supply. The Refined BRT Alternative has a total of 336,700 daily transit trips, according to table 4.1-2 on page 4-4. Of that amount, only 75,600 or 22.5 percent involve a boarding on an In-Town BRT vehicle, according to table 4.1-4 on page 4-5. The other 261,100 or 77.5 percent of the trips apparently involve a bus-only ride. The following places the data in tabular form.

TOTAL DAILY TRANSIT TRIPS  
TRIPS WITH IN-TOWN BRT BOARDINGS AND BUS-ONLY TRIPS  
(in 2025)

Total Daily Trips	Trips With In-Town BRT Boardings	Bus-Only Trips (Trips Without In-Town BRT Boardings)
336,700	75,600	261,100
100.0%	22.5%	77.5%

Sources: Table 4.1-2 on page 4-4 and table 4.1-4 on page 4-5 of the SDEIS.

Chapter 4, however, does not provide data on transit travel times involving bus-only trips.

Because of the importance of the bus service assumed in the SDEIS, transit travel times between selected origins and Downtown should be provided for trips that will not involve a boarding on the In-Town BRT system.

Comparable Auto Travel Times

(20) Chapter 4 does not include data on auto travel times under the Refined BRT Alternative.

The following tables compare in-vehicle transit travel times and auto travel times under the Refined BRT Alternatives between assumed suburban transit facilities and Downtown during the peak hours. Sources of the in-vehicle transit travel times and auto travel times are the tables attached to Communication D-840

(2000) in response to question (26) on page 18.<sup>9</sup> The transit travel time table attached to the Communication, however, does not appear to include the transfer times, when applicable, for the transit trips.<sup>10</sup> The table also does not appear to include wait times at the beginning of the transit trips and walk times at the end of the trip.

The tables, with adjustments for transit transfer times if appropriate, should be included in the FEIS. The data are important for public awareness of the differences in travel times under the transit and auto modes.

The tables also may serve another purpose. Policy makers and the public may review the travel times, especially auto travel times, and judge whether the times are logical for the hypothetical traffic situation in 2025 based on experience in actual current traffic.

COMPARISON OF IN-VEHICLE TRANSIT TRAVEL TIME AGAINST AUTO TRAVEL TIME UNDER REFINED BRT ALTERNATIVE TO DOWNTOWN DURING A.M. AND P.M. PEAK HOURS IN 2025

A.M. Peak	In-Vehicle Transit Travel Time	Auto Travel Time	Difference Total Transit Time Travel Minus Auto Travel Time
Kapolei Transit Center	37.6 mins.	43.8 mins.	(6.2) mins.
Waianae Transit Center	67.6 mins.	79.1 mins.	(11.5) mins.
Waipahu Transit Center	26.5 mins.	39.3 mins.	(12.8) mins.
Kaneohe Transit Center	39.3 mins.	24.4 mins.	4.8 mins.
Wahiawa Town Transit Center	37.0 mins.	46.3 mins.	(9.3) mins.
Hilliam Town Transit Center	35.4 mins.	43.5 mins.	(8.1) mins.
Kaliua Transit Center	26.2 mins.	27.5 mins.	(1.3) mins.
Wahiawa Park-And-Ride	32.5 mins.	44.4 mins.	(11.9) mins.
Hilliam Mauka Park-3rd St	30.8 mins.	42.5 mins.	(11.7) mins.
Royal Kunia Park-And-Ride	28.1 mins.	39.9 mins.	(11.8) mins.
Hawaii Kai Park-And-Ride	25.5 mins.	21.6 mins.	3.9 mins.

P.M. Peak	In-Vehicle Transit Travel Time	Auto Travel Time	Difference Total Transit Time Travel Minus Auto Travel Time
Kapolei Transit Center	41.0 mins.	43.1 mins.	(2.1) mins.
Waianae Transit Center	68.6 mins.	76.9 mins.	(8.3) mins.
Waipahu Transit Center	32.5 mins.	40.5 mins.	(8.0) mins.
Kaneohe Transit Center	32.4 mins.	24.2 mins.	8.2 mins.
Wahiawa Town Transit Center	37.7 mins.	44.3 mins.	(6.6) mins.
Hilliam Town Transit Center	39.5 mins.	41.1 mins.	(1.6) mins.
Kaliua Transit Center	28.0 mins.	22.6 mins.	5.4 mins.
Wahiawa Park-And-Ride	39.0 mins.	41.4 mins.	(2.4) mins.
Hilliam Mauka Park-And-Ride	33.2 mins.	39.8 mins.	(6.6) mins.
Royal Kunia Park-And-Ride	37.9 mins.	40.8 mins.	(2.9) mins.
Hawaii Kai Park-And-Ride	28.8 mins.	22.3 mins.	6.5 mins.

<sup>9</sup> Travel times between the Pearl City/Aiea transit center and Downtown are not included in the following tables. The times set forth in the tables attached to Communication D-840 (2000) apparently assumed the transit center to be at the Kam Drive-In site. That site is no longer under consideration for a transit center.

<sup>10</sup> The table is entitled "In-Vehicle Transit Travel Time To and From Downtown (TAZ 255) (undercorrecting added)." A transfer adds time to a trip. The response to question (23)(D) of Communication D-840 (2000) states: "(a) transfer penalty of 6 minutes was used" in the patronage forecasting methodology.

"Vehicle Hours Of Delay" For Refined BRT Alternative

(21) The first paragraph on page 4-13 discusses the "vehicle miles traveled" and "vehicle hours of delay" for all Alternatives. The paragraph notes that the Refined BRT Alternative will have fewer "vehicle hours of delay" than the No-Build Alternative. The paragraph, however, does not compare the Refined BRT Alternative with the TSM Alternative regarding "vehicle hours of delay."

Table 4.2-2 on page 4-13 provides the following data on the "vehicle hours of delay" during the peak periods for the TSM Alternative and Refined BRT Alternative.

COMPARISON OF PROJECTED PEAK PERIOD  
VEHICLE HOURS OF DELAY  
FOR TSM ALTERNATIVE AND REFINED BRT ALTERNATIVE  
In 2025

Vehicle Hours Of Delay	Time Period		Refined BRT Alternative
	TSM Alternative	Refined BRT Alternative	
A.M. Peak P.M. Peak Total Peak	112,700	114,785	243,261 (As is in the SDEIS.)
	124,036	128,477	
	236,744		

Source: Table 4.2-2 on page 4-13 of the SDEIS.

The discussion should indicate that the Refined BRT Alternative will have more "vehicle hours of delay" in the peak periods than the TSM Alternative.

"Levels Of Service" At Intersections

(22) Table 4.2-7 on page 4-19 displays the levels of service during the peak periods at various intersections.

The table should include levels of service for the following:

- (A) Intersections adjacent to Regional BRT transit centers/park-and-ride facilities that are expected to attract substantial bus trips; and

- (B) More Dillingham Boulevard intersections; and
- (C) Kapiolani Boulevard intersections situated Koko Head of the Kalakaua Avenue intersection.

Operation Of Iwilei, Honolulu Community College, And Apparent Waikiki Park-And-Ride Facilities

(23) Table 4.1-8 on page 4-9 shows the "drive" mode of arrivals at In-Town BRT stations. Table 4.3-1 on page 4-23 shows the number of park-and-ride stalls at In-Town BRT stations. The following table combines the data.

IN-TOWN BRT STATIONS  
DRIVE MODE OF ARRIVALS AND NUMBER OF PARKING STALLS  
(In 2025)

Station	Drive Arrivals	Parking Stalls
Middle Street	1,691	1,000
Honolulu Community College	307	300 (For "Kalihi Park-and-Ride")*
Iwilei	305	300
Saratoga	1,276	?

\* See the response to question (30) (A) on page 20 of Communication D-840 (2000). Regarding the Kalihi park-and-ride facility, the response states: "The park-and-ride facility is located in the vicinity of Honolulu Community College."

Sources: Table 4.1-8 on page 4-9 and table 4.3-1 on page 4-23 of the SDEIS.

All "drive arrivals" at each station appear to be "park-and-ride" arrivals rather than "kiss-and-ride" arrivals. This conclusion is reached because only stations with parking stalls have "drive arrivals."

- (A) Justification For Iwilei And Honolulu Community College Park-And-Ride Facilities -- The Iwilei and Honolulu Community College park-and-ride facilities are very near Downtown and relatively near other major urban employment areas. According to the response to question (30) (B) on page 20 of Communication D-840 (2000), the City Administration expects people to drive to those facilities, park their autos, and then ride an



In-Town BRT vehicle to their destinations. The City Administration states: "Since downtown parking is not paid for or provided by all employers, some employees would choose to park in lower-priced peripheral parking and use transit to complete their journey to work." This strategy for park-and-ride facilities so near downtown seems inconsistent with the intent of diverting people from autos to transit and reducing auto traffic congestion in the urban core.

Better justification for the Iwilei and Honolulu Community College park-and-ride facilities should be included in the FEIS so that policy makers and the general public may decide if the facilities are necessary.

(B) Enforcement Of Honolulu Community College Park-And-Ride Facility -- As the previous discussion indicates, the City Administration intends the Honolulu Community College park-and-ride facility to be used to intercept downtown employees who drive to work. Logic, however, indicates that the facility will be very attractive to Honolulu Community College students.

A discussion should be provided on the plan to enforce the proper use of the Honolulu Community College park-and-ride facility. The discussion should describe the plan for preventing a student from parking the student's auto at the facility and walking to attend class.

(C) Enforcement Of Iwilei Park-And-Ride Facility -- The State is planning to construct a civic center near the Iwilei park-and-ride facility. Additionally, some businesses operate within walking distance of the facility.

A discussion should be provided on the plan to enforce the proper use of the Iwilei park-and-ride facility. The discussion should describe the plan for preventing an employee at the Iwilei civic center or nearby business from parking the employee's auto at the facility and walking to work.

(D) Justification For Apparent Saratoga Park-And-Ride Facility -- The response to question (27) (B) on page 19 of Communication D-840 (2000) states in part: "The travel demand analysis assumes the potential use of the Hale Koa garage and/or future garage at Ft. DeRussy as a park-and-ride [sic] so that new parking could be reduced at new hotel sites."

It does not seem logical that a person in Waikiki would drive to the Saratoga station to access the In-Town BRT system, especially since the loop on Kalakaua Avenue and Kuhio Avenue makes the system easily accessible from almost everywhere in Waikiki. A better justification for the Saratoga park-and-ride facility and number of "drive" arrivals should be provided.

If the assumption is that the In-Town BRT system will be ridden by hotel guests who park their rented autos at the park-and-ride facility, then elaboration should be provided. The question is: why would they choose transit rather than the rented autos for their trips?

If the assumption is that visitor industry employees residing outside Waikiki will drive their autos to the park-and-ride facility and ride the In-Town BRT system to work, then justification for such use of the facility should be provided. Under that assumption, the facility would seem to serve as an auto trip generator rather than an auto trip reducer.

#### Impact Of Fort Armstrong Tunnel

(24) The Transportation For Oahu Plan: TOP 2025<sup>11</sup> adopted by the OMPO Policy Committee includes a Fort Armstrong Tunnel project that will enable autos to travel through Sand Island to the Kakaako makai area.

The Travel Forecasting Results Report includes ridership data for a BRT Alternative with the "Sand Island Scenic Parkway." A component of the "Parkway" is a Fort Armstrong Tunnel to the Kakaako makai area. The data indicate that the BRT with Sand

<sup>11</sup> Carter Burgess, prepared for the Oahu Metropolitan Planning Organization and its participating agencies, Transportation For Oahu Plan: TOP 2025 (Honolulu: 2007), table 4-1, page 4-5.

Island Scenic Parkway Alternative will have 22,800 daily transit trips less than the original BRT Alternative without the Parkway. See table 4-2 on page 4-2 of the Travel Forecasting Results Report.

Although the surface portion of the Sand Island Scenic Parkway is not included in TOP 2025, the data in the Travel Forecasting Results Report lead to a reasonable conclusion that a Fort Armstrong Tunnel will likely reduce transit ridership.

(A) Since the Fort Armstrong Tunnel remains in TOP 2025, a discussion should be provided on whether the ridership forecast for the Refined BRT Alternative assumes the existence of the Tunnel in 2025. If the forecast does not assume the existence of the Tunnel, the reason for excluding the Tunnel from the assumption should be provided.

(B) A discussion also should be provided on how the Kakaako exit of the Fort Armstrong Tunnel will interface with the "Kakaako Makai" alignment of the In-Town BRT system.

#### CHAPTER 5 ENVIRONMENTAL ANALYSIS AND CONSEQUENCES

##### Leakage Of Federal New Start Funds

(25) Pages 5-18 and 5-19 discuss the construction economic impacts of the federal new start funds for the Refined BRT Alternative. The impact is based on the expenditure of \$147 million in 1998 dollars of federal new start funds.

The discussion should state whether the \$147 million was adjusted to eliminate the portion of federal new start funds that, at least in theory, should be allocated to the following:

- (A) Materials, supplies, equipment, and services imported into the State or provided out-of-state;
- (B) Profit retained by out-of-state contractors; and
- (C) Taxes.

If the construction impact analysis was performed without

the adjustments, the discussion and tables should reflect the expenditure of appropriately adjusted federal new start funds.

##### Consideration Of Federal New Start Funds Actually Expended For Construction

(26) According to the fifth paragraph on page 6-10, some City general obligation bonds will have to be expended for construction as an advance for federal new start funds. When the federal new start funds are reimbursed to the City, the funds apparently will not be used for more construction. Instead, the funds apparently will be used in subsequent years for "bus replacement."

The amount of federal new start funds reimbursed to the City for the advanced City general obligation bonds should not be inputted for the construction economic impact analysis. As indicated previously, those funds apparently will be used for bus replacement, not construction, and, according to the second full paragraph on page 5-17: "Buses ... are assumed to be procured from outside the State."

The amount of local general obligation bonds advanced for construction also should not be factored in the economic impact analysis. "This is because local funds invested in the project ... would likely be spent in some other manner within the local economy -- with similar multiplied impacts -- in the absence of investment in the primary transportation corridor." See the last paragraph on page 5-18.

##### Business Displacements And Property Acquisitions

(27) Table 5.2-1 on page 5-21 indicates that the Refined BRT Alternative may result in up to 17 total business displacements and up to 47 partial business displacements.

- (A) The businesses that may be displaced and their addresses should be identified.
- (B) Other necessary property acquisitions that do not require business displacements should also be identified.

Noise Impact Of Aloha Stadium Transit Center/Park-And-Ride Facility

(28) Section 5.6, commencing on page 5-32, discusses noise impacts.

The Section, however, does not address the noise impact of the Aloha Stadium transit center/park-and-ride facility on the nearby Halawa Valley and Makalapa residential communities. More bus and auto activity logically will occur at the transit facility because the Luapele Drive ramp replaces two others and the number of park-and-ride stalls increases to 1,000 from 500.

Direct Energy Impact From "Vehicle Hours Of Delay"

(29) Section 5.9.1 commencing on page 5-39 discusses the "direct energy (operational)" impact. The fifth paragraph on page 5-39 states:

In assessing the direct energy impact, the following factors were used:

- Annual vehicle miles traveled (VMT) for automobiles, trucks, buses, and In-town Town (sic) BRT vehicles.
- Fuel consumption rates by vehicle type.

The statement is silent concerning "vehicle hours of delay."

The discussion should clarify whether the amount of "vehicle hours of delay" was used to determine the direct energy impact of each Alternative. If not, the discussion should explain the reason for the omission.

Number Of "Passenger Vehicles" And "Transit Buses" For "Indirect Energy Impact"

(30) The second full paragraph on page 5-40 states: "Indirect energy also involves the manufacturing and maintenance of vehicles. This includes both passenger vehicles and transit buses."

A discussion should be provided on how the numbers of "passenger vehicles" and "transit buses" under each Alternative were determined. The discussion also should identify the numbers for each Alternative.

If the number of "passenger vehicles" represents or includes the autos that theoretically will not be purchased by new transit riders making home-based work trips, then justification should be provided. A person changing to the transit mode for a home-based work trip likely will continue to own an auto for non-work trips.

"Indirect Energy Consumption" For "Maintenance"

(31) The first full paragraph on page 5-43 states: "Construction of the Refined BRT Alternative would result in the greatest indirect consumption of energy in comparison to the other alternatives." For construction, the indirect energy consumption appears to be a one-time value.

With respect to the indirect energy consumption for maintenance, the first full paragraph on page 5-43 also states that "overall energy consumption for maintenance [under the Refined BRT Alternative] would be approximately one thousand barrels of oil more due to the increased use [sic] number of transit vehicles in service." Table 5.9-3 on page 5-42 indicates that the indirect energy consumption for "maintenance" is calculated based only on the maintenance of "passenger vehicles" and "transit buses."

(A) The table and a discussion should indicate whether the indirect energy consumption for "maintenance" is an annual or one-time value.

(B) The table also should include indirect energy consumption values for the maintenance of "roadways," "parking," "structures," and "maintenance facility." Indirect energy consumption values are provided in the table only for construction of those facilities.

Effect Of Elimination Of Ala Moana Boulevard Street Parking On Ala Moana Park

(32) The fourth full paragraph on page 5-47 discusses the federal "Section 4(f)" limitations on the use of parklands for

transportation projects. The paragraph states:

The word "use" in this case means:

\*\*\*

- the project's proximity to the site substantially impairs those functions that qualify the site as a Section 4(f) resource even though no land is permanently or temporarily acquired. This is called "constructive use."

A discussion should be provided on whether the elimination of the on-street parking for Ala Moana Park caused by the In-Town BRT alignment represents a "constructive use" under Section 4(f).

#### CHAPTER 6 FINANCIAL ANALYSIS

##### Use Of Fiscal Period 2002-2010 For Conceptual Capital Funding Plan Of Refined BRT Alternative

(33) Table 6.1-3C on page 6-8 displays the "conceptual capital funding plan" for the Refined BRT Alternative for the fiscal years 2002-2010. In contrast, table 6.1C-3 on page 6-8 of the DEIS displays the conceptual funding plan for the original BRT Alternative for the fiscal years 2001-2010.

- (A) For a better understanding of the total cost of the integrated transit system, the "conceptual capital funding plan" for the Refined BRT Alternative should encompass the fiscal period 2001-10. Some of the buses or other improvements paid with expenditures during the fiscal year 2001 will be used under the Refined BRT Alternative.

- (B) The "conceptual capital funding plan" for the Refined BRT Alternative shows a bus acquisition cost of \$16,649,000 less than the bus acquisition cost for the original BRT Alternative in the DEIS. The reason for the difference should be explained.

##### Interest On Debt Service

(34) Table 6.1 on page 6-3 sets forth the capital costs of

25

the Alternatives.

At least in a footnote, the table should include the amount of interest payable on general obligation bonds issued to fund each Alternative.

Calculation based on the data in table E-3 on page E-11 indicates that interest payable for the Refined BRT Alternative during the 2002 to 2025 period will amount to \$195,442,000 for general obligation bond proceeds of \$331,000,000.<sup>11</sup>

##### Land Acquisition Costs

(35) The SDEIS does not mention whether land acquisition costs for transit centers and park-and-ride facilities are included in the capital cost of the Refined BRT Alternative. In contrast, the first paragraph on page 2-34 of the DEIS indicates that land acquisition costs for some facilities were not included in the capital costs of the Alternatives.

- (A) A discussion should be provided on whether the capital cost of the Refined BRT Alternative includes all costs for land acquisition, when necessary, for transit centers and park-and-ride facilities.

- (B) The discussion should identify the transit centers and park-and-ride facilities, the acquisition of land for which may be required, and the estimated cost of acquisition.

##### Inclusion Of Pearl City/Aiea Working Group's Recommendations And Apparent Waikiki Park-And-Ride In Refined BRT Alternative's Conceptual Capital Funding Plan

(36) Table 6.1-1 on page 6-3 displays the capital costs of the Alternatives.

- (A) The capital cost of the Refined BRT Alternative should include the cost to the City, if any, of the apparent Waikiki park-and-ride facility.

<sup>11</sup> The calculation is as follows: \$526,442,000 in "debt service on bonds issued after 2002" - \$331,000,000 in "G.O. bond proceeds." The calculation does not include debt service payments after 2025 for bonds issued before 2025.

(B) The capital cost of the Refined BRT Alternative also should include the costs of the Pearl City and Alea park-and-ride facilities recommended by the Pearl City/Alea Working Group. According to generic estimates, one four-bus bay, 100-surface parking stall facility has a capital cost of \$1,660,000 in 1998 dollars, excluding land acquisition cost. See page 5 of the "Regional BRT Transit Centers Capital Cost Estimates" and page 5 of the "Regional BRT Transit Parking Capital Cost Estimates" in the Estimated Capital Costs Technical Report.<sup>11</sup>

(C) If the Kamehameha Highway bus contra-flow operation recommended by the Pearl City/Alea Working Group is expected to incur capital cost, that cost should be included in the capital cost of the Refined BRT Alternative.

Commitment To Bus Acquisition Schedule

(37) An ambitious bus purchase schedule for the 2000 to 2025 period is set forth for the original BRT Alternative. The following table displays the number of buses that must be purchased under the schedule.

BUS PURCHASE SCHEDULE BETWEEN 2000 AND 2025  
FOR ORIGINAL BRT ALTERNATIVE

Minibuses	Standard Buses	Articulated Buses	TOTAL
170	893	174	1,237

Source: Page 3 of the "Bus Replacement Capital Cost Estimates" of the Estimated Capital Costs Technical Report.

Much of the benefits of the Refined BRT Alternative will result from the bus service.<sup>12</sup> Most of the transit trips under

<sup>11</sup> Parsons Brinckerhoff Quade & Douglas, Inc., prepared for the City Department of Transportation Services, (Final) Technical Memorandum On Estimated Capital Costs And (Draft) Technical Memorandum On Estimated Capital Costs For Sand Island Bypass/Minister Parkway Elements, dated May 2000.

<sup>12</sup> Logic indicates that the bus purchase schedule for the Refined BRT Alternative will be the same or similar to that for the original BRT Alternative since both will have a fleet of 730 buses in 2025. Consequently, any conclusion derived from the schedule for the original BRT Alternative would seem applicable to the Refined BRT Alternative.

the Alternative will be taken only on buses. Consequently, adherence to the bus supply will be necessary to achieve most of the forecasted ridership and benefits of the Refined BRT Alternative.

Bus purchases and service, however, will be susceptible to cutbacks if the City experiences future financial problems.

A discussion should be provided on the plan to adhere to the bus purchase schedule and bus service supply identified for the Refined BRT Alternative. The discussion should indicate what type of legislative or intergovernmental commitment is necessary now to guarantee adherence to the schedule in the future. The discussion also should indicate what penalty, if any, may be imposed by the Federal Transit Administration on the City due to noncompliance with the bus purchase schedule.

Need For Additional Federal New Start Funds For Refined BRT Alternative

(38) Table 6.1-3C on page 6-8 of the SDEIS indicates that, under the capital funding plan for the Refined BRT Alternative, federal new start funds amounting to \$229,751,000 will be required. In contrast, table 6.1-3C on page 6-8 of the SDEIS indicates that the original BRT Alternative would have required \$182,100,000 in federal New Start funds.

A discussion should be provided on the competitive process for obtaining federal new start funds from the Federal Transit Administration. The discussion also should summarize the contingency funding source if the City does not receive the full amount.

Justification For Statements Concerning Future Taxes

(39) The third paragraph on page 6-1 states: "The financial analysis concludes that the Refined BRT Alternative along with the system-wide bus and TheHandi-Van replacement and expansion program can be funded without adding new taxes or raising taxes using the following revenues sources: . . ."

(A) A discussion should address whether City funds will have to be diverted from existing non-transit programs and projects to the Refined BRT Alternative as a

consequence of the capital and operating and maintenance funding plans in the SDEIS. If no diversion is required, justification should be provided, given the increased debt service and operating and maintenance cost for the Alternative.

- (B) The discussion also should address whether taxes will have to be added or raised to replace the City funds diverted from non-transit programs and projects to the Refined BRT Alternative. If taxes will not have to be added or raised, justification should be provided.

Use Of Federal Formula Funds For Capital Needs

(40) The conceptual capital funding plan for the Refined BRT Alternative proposes the use of the major portion of the annual federal Section 5307 grant to the City for capital costs. The last paragraph on page 6-6 states: "Over the 2005-2021 period, a minimum of 30 percent of the City's Section 5307 funds are assumed to be used for preventive maintenance,, [sic] with a maximum of 70 percent used for other capital and planning needs." The second full paragraph on page 6-12 states: "The assumption made in the financial analyses is that a minimum of \$12.00 million in FTA Section 5307 funds would be reserved for preventive maintenance in FY 2002, and a minimum of \$6.00 million annually in FYs 2003-05."

The following table displays the amounts expended or encumbered for "preventive maintenance" from the federal grants fund in the recent past. Expenditures from that fund are made for City operating programs.

FEDERAL GRANTS FUND  
EXPENDITURES AND ENCUMBRANCES FOR  
"PREVENTIVE MAINTENANCE"  
(In Thousands Of Dollars)

	FY 98-99	FY 99-00	FY 00-01
Preventive Maintenance Expenditures/Encumbrances As Of June 30 Of Fiscal Year	\$ 5,798.6	\$18,276.6	\$20,000.0

Sources: Pages on the federal grants fund for "transportation services" in the "Budget And Fiscal Services Director's Financial Report" for the pertinent fiscal years. The "Reports" do not identify the "preventive maintenance" funds as coming from the Section 5307 grants. A conclusion that the funds are from the Section 5307 grants, however, seems reasonable.

- (A) The amounts of federal funds expended on or encumbered for preventive maintenance, an operating program, were more than \$6 million in the fiscal year 1999-2000 and fiscal year 2000-01. The operating and maintenance cash flow analysis in table E-3 indicates that City general funds apparently will have to replace the federal preventive maintenance funds diverted to the capital cost of the Refined BRT Alternative. A discussion of whether this assessment is correct should be provided.

- (B) If the assessment under paragraph (A) is correct, the last sentence on page 6-6 should be eliminated or appropriately revised. It states: "The Section 5307 assistance for preventive maintenance reduces the annual General Fund subsidy for transit operating and maintenance (O&M) costs." When compared to the expenditures in fiscal year 1999-00 and fiscal year 2000-01, the planned diversion of the federal funds in subsequent years to capital cost may require an increase of the City general fund subsidy for transit operating and maintenance.

- (C) A discussion should be provided on whether the diversion of federal funds from preventive maintenance to capital cost will result in less bus maintenance in the future.

Availability Of Federal Highway Administration Funds

(41) The fourth and fifth paragraphs on page 6-9 discuss the availability of Federal Highway Administration funds for the capital cost of the Refined BRT Alternative. The following statement is in the fourth paragraph: "Currently, a total of \$116 to \$120 million in FHWA funds are received each year by the State." The fifth paragraph states: "For the Refined BRT Alternative, a total of \$160 million in FHWA funding has been assumed in the financial analysis, with the amount capped at \$20 million annually over the FYs 2002-2010 period."

The amounts of FHWA funds annually expended by the City for capital improvements in the recent past should be identified. A discussion also should be provided on the probability of the City receiving \$20 million annually in FHWA funds.

Response To State Director Of Transportation's Statement On Use Of Federal Highway Administration Funds

(42) In a letter, dated September 18, 2001, to the City Director of Transportation Services, the State Director of Transportation comments on State participation in funding the BRT project. The letter reads in part:

We have from the onset expressed our reservations on being able to fund this project, as the statewide needs far exceed our limited resources. More recently, in meetings on the project, we were advised that alternative funding strategies were in place, where Federal Highways (FHWA) and State funds would not be required.

As such, it is not our intent or expectation to provide funding for the BRT project, and have developed our capital improvement programs accordingly. (Underscoring added.)

A response to the State Director of Transportation's position regarding the FHWA funds should be provided. If FHWA funds are unavailable, the contingency funding source should be identified.

Availability Of City Highway Funds For Increased Debt Service Of Refined BRT Alternative

(43) The third full paragraph on page 6-10 discusses the use of City highway funds for debt service. The paragraph includes the statement: "Over this same period [fiscal years 2002-2010], the average annual contribution for debt service would be \$34.74 million, of which approximately 45 percent would be for debt incurred by the City prior to 2002." The following compares the actual, estimated, and proposed transfers in recent years of City highway funds to pay debt service. As is displayed, the amounts are much less than \$34.74 million.

TRANSFERS FROM CITY HIGHWAY FUND TO PAY DEBT SERVICE

FY 2002-10 Average Annual Contribution Under SDEIS	FY 2000-01 Actual Transfer	FY 2001-02 Estimated Transfer	FY 2002-03 Proposed Transfer
\$34,740,000	\$14,949,000	\$13,943,829	\$16,872,798

Sources: For the FY 2000-01 actual transfer, page 112 of the Comprehensive Annual Financial Report For The Fiscal Year Ended June 30, 2001. For the FY 2001-02 estimated transfer and FY 2002-03 proposed transfer, page C-8 of the The Executive Program And Budget, Fiscal Year 2003, Volume I: Operating Program And Budget.

(A) A discussion should be provided on what effect the diversion of the additional City highway funds for the Refined BRT Alternative's debt service will have on other programs and projects now funded by City highway funds.

Of particular interest is whether the annual \$18 to \$20 million in additional City highway funds for the debt service payment will be diverted from the City highway fund transfers to the bus transportation fund. For fiscal year 2002-03, the proposed "bus subsidy" from the City highway fund is \$33,990,661, according to page C-16 of The Executive Program And Budget, Fiscal Year 2003, Volume I: Operating Program And Budget.

(B) A discussion also should be provided on the City

Administration's intention regarding the source of debt service payment for future City highway projects.

Use Of City Highway Funds For Capital Match

(44) The third full paragraph on page 6-10 states: "Over the longer FYs 2002-2025 period, the average annual contribution from the City Highway Fund to provide local match to federal grants is projected to be \$5.53 million."

According to the response to question (45) (A) on page 35 of Communication D-840 (2000), the City has not made any cash expenditure from the City highway fund for a mass transit capital project in the recent past.

A discussion should be provided on whether a cash expenditure from the City highway funds for a capital improvement project will be affordable, given the other City highway fund obligations, both proposed in the SDEIS and existing under current budgetary practice.

Funding Source For Debt Service

(45) A discrepancy exists in the description of the funding source of the debt service for the Refined BRT Alternative. Table E-3 indicates that the debt service will be paid from the City highway fund. Additionally, in a discussion of the City highway fund, the second full paragraph on page 6-10 states: "It is assumed that the Fund pays for debt service on transit-related bonds issued after 2002." In discussing the City general fund, however, the fourth full paragraph on the same page states: "The debt service on General Obligation Bonds would be paid from the City General Fund."

Clarification should be provided on whether the debt service for the Refined BRT Alternative will be payable from the City highway fund or City general fund. A transfer of City highway funds to the City general fund for subsequent payment of the debt service should be regarded as a payment from the City highway fund.

Availability Of General Obligation Bond Capacity

(46) The third paragraph on page 6-11 states: "The issuance

of General Obligation Bonds is constrained in the financial analyses to a total equivalent to the 1996 level of \$1.13 billion outstanding in any given year. This amount is adjusted annually to reflect a conservative 1.5 percent rate of inflation and to allow for repayment of principal and interest on outstanding bonds."

(A) The City Administration uses outstanding general obligation bonds as the factor for determining the capacity for additional general obligation bonds. The City Administration does not factor in its analysis outstanding reimbursable and revenue bonds payable from dedicated revenues instead of general revenues. Debt service on certain of those outstanding bonds, such as sewer bonds, is also payable by residents and businesses through special charges additional to real property taxes. Thus, the debt burden from reimbursable and revenue bonds should be considered in addition to the debt burden from general obligation bonds. Housing or other types of bonds, the debt service of which is payable exclusively by limited beneficiaries, should be excluded.

(B) The following is a portion of a table from The Comprehensive Annual Financial Report For The Fiscal Year Ended June 30, 2001, with verbatim footnotes. It indicates that the \$1,132,844,000 in direct bonded debt in fiscal year 1995-96 included bonds for sewer and refuse collection purposes. Only from the fiscal year 1999-2000 does the direct bonded debt exclude bonds for sewer and refuse collection purposes. Consequently, the \$987,147,000 in direct bonded debt in that year should be the appropriate base for the City Administration, under its methodology, to measure the direct bonded debt ceiling in subsequent years for transit and other non-self-supporting projects.



**DIRECT BONDED DEBT**  
**FROM FISCAL YEAR 1991-92 TO FISCAL YEAR 2000-01**  
 (The footnote designations and narratives are repeated verbatim from the source to avoid misinterpretation of the information)

Fiscal Year	Direct Bonded Debt (c) (In Thousand \$)
1991-92	635,872
1992-93	912,630
1993-94	1,122,894
1994-95	1,078,373
1995-96	1,132,844 (d)
1996-97	856,596 (d)
1997-98	870,856 (d)
1998-99	978,576 (d)
1999-00	987,147 (d)
2000-01	1,103,082 (d)

(c) Excludes non-tax supported debt.  
 (d) Effective fiscal year 1997, excludes bonds issued for sewer purposes by Ordinance No. 97-46. Effective fiscal year 2000, excludes bonds issued for refuse collection by Ordinance No. 99-22.

Source: Table 8 on page 216 of The Comprehensive Annual Financial Report For The Fiscal Year Ended June 30, 2001.

A discussion should be provided of the following:

- (1) Why the City Administration uses the \$1,132,844,000 figure for fiscal year 1995-96, the highest in recent years, for its calculation of the direct bonded debt ceiling instead of the more appropriate \$987,147,000 in fiscal year 1999-00?
- (2) Whether, according to the City Administration's adjustment methodology, the City exceeded its direct bonded debt ceiling in fiscal year 2000-01? If the \$987,147,000 is increased by 1.5 percent, the result is \$1,001,954,000. If the \$987,147,000 is increased by 4.0 percent, the sum of 1.5 percent and the 2.5 percent assumed inflation rate, the result is \$1,026,633.
- (3) Whether, according to the City Administration's 1.5 percent adjustment methodology, the City may issue bonds in fiscal year 2002-03 without violating the

direct bonded debt ceiling for that fiscal year? According to Communication D-943 (2001), outstanding and unpaid general obligation bonds amounted to \$1,306,499,928 as of December 5, 2001.

Increased General Obligation Bond Proceeds

(47) From the fiscal year 1995-96 to the fiscal year 1998-99, the City annually received about \$100,000,000 in general obligation bond proceeds for the general obligation and highway improvement bond funds. Since then, the annual amounts of general obligation bonds received for those funds have increased. More notably, the City Administration proposes a major increase for the fiscal year 2002-03. The following table displays the data.

**CITY GENERAL OBLIGATION BOND PROCEEDS OF  
 GENERAL IMPROVEMENT BOND FUND AND HIGHWAY IMPROVEMENT BOND FUND**  
 (In Thousands Of Dollars)

G. O. Bond Proceeds Of:	FY 95-96 Actual	FY 96-97 Actual	FY 97-98 Actual	FY 98-99 Actual
Gen. Imp. Bond Fund	\$ 70,081	\$ 91,437	\$ 87,444	\$ 77,000
Hwy. Imp. Bond Fund	\$ 29,918	\$ 8,562	\$ 12,556	\$ 23,000
<b>TOTAL</b>	<b>\$ 99,999</b>	<b>\$ 99,999</b>	<b>\$100,000</b>	<b>\$100,000</b>
G. O. Bond Proceeds Of:	FY 99-00 Actual	FY 00-01 Actual	FY 01-02 Estimated	FY 02-03 Proposed By City Admin.
Gen. Imp. Bond Fund	\$ 86,500	\$ 98,340	\$105,000	\$157,084
Hwy. Imp. Bond Fund	\$ 25,000	\$ 51,720	\$ 45,000	\$116,548
<b>TOTAL</b>	<b>\$111,500</b>	<b>\$150,060</b>	<b>\$150,000</b>	<b>\$273,632</b>

Sources: For fiscal year 1995-96 to fiscal year 2000-01, the pages showing the combined income statements for the capital project funds in the Comprehensive Financial Report for those fiscal years. For fiscal years 2001-02 and 2002-03, pages C-36 and C-37 of The Executive Program And Budget. Fiscal Year 2001, Volume I: Operating Program And Budget.

A discussion should be provided on the City Administration's

intent with respect to the annual amounts of general obligation bonds planned to be issued for all City projects in the near future. The discussion is necessary to better integrate the capital funding plan for the Refined BRT Alternative with the projected funding of other capital improvement projects.

General Obligation Bonds Required For Refined BRT Alternative

(48) Table 6.1-12 on page 6-20 displays the annual general obligation bond requirements for the Refined BRT Alternative for the fiscal year 2001-02 through fiscal year 2004-05. No comparison is provided to past general obligation bond expenditures for transit projects.

Highway improvement bond fund expenditures for "utilities or other enterprises" may serve as a proxy for general obligation bond fund expenditures for transit projects. The "utilities or other enterprises" function appears to consist almost exclusively of such projects. Furthermore, most of the proceeds of the highway improvement bond fund are from general obligation bonds.<sup>11</sup>

The following table compares (1) past highway improvement bond fund expenditures for "utilities or other enterprises" and expenditures/encumbrances/appropriations for one additional project against (2) the proposed general obligation bond funding requirements for the Refined BRT Alternative. The additional project is the Pearl City bus facility. For an unknown reason, appropriations for that project were made in fiscal year 1997-98 and fiscal year 1999-00 under the "general government" function, not "utilities or other enterprises."

Basically, the table shows that the proposed annual general obligation bond expenditures for the Refined BRT Alternative will be much greater than the past annual highway improvement bond expenditures for transit projects.

<sup>11</sup> In the recent past, there were no expenditures from the general improvement bond fund for "utilities or other enterprises."

COMPARISON OF HIGHWAY IMPROVEMENT BOND FUND EXPENDITURES FOR "UTILITIES OR OTHER ENTERPRISES" AND GENERAL IMPROVEMENT BOND FUND EXPENDITURES/ENCUMBRANCES/APPROPRIATIONS FOR PEARL CITY BUS FACILITY FROM FISCAL YEAR 1995-96 THROUGH FISCAL YEAR 2000-01 AGAINST ANNUAL GENERAL OBLIGATION BOND REQUIREMENTS FROM FISCAL YEAR 2001-02 THROUGH FISCAL YEAR 2004-05

FOR REFINED BRT ALTERNATIVE  
(In Thousands of Dollars)

	FY 95-96 Actual	FY 96-97 Actual	FY 97-98 Actual	FY 98-99 Actual		
Highway Imp. Bond Funds Expended For Utilities/ Other Enterprises	\$ 4,410	\$ 2,162	\$ 3,992	\$ 2,384		
General Imp. Bond Funds Exp./Enc. For Pearl City Bus Facility			\$ 4,999			
<b>Total</b>	\$ 4,410	\$ 2,162	\$ 8,991	\$ 2,384		
	FY 99-00 Actual	FY 00-01 Actual	FY 01-02 Proposed	FY 02-03 Proposed	FY 03-04 Proposed	FY 04-05 Proposed
Highway Imp. Bond Funds Expended For Utilities/ Other Enterprises	\$ 3,587	\$ 4,685				
General Imp. Bond Funds Approp. For Pearl City Bus Facility	\$ 1,100					
<b>Total</b>	\$ 4,687	\$ 4,685				
G.O. Bond Requirement For Refined BRT			\$ 28,000	\$ 60,000	\$103,000	\$ 68,000

Sources: For fiscal year 1995-96 to fiscal year 2000-01, the pages with the income statements for the highway improvement bond fund in the Comprehensive Financial Report for the pertinent fiscal years. For the Pearl City bus facility, page 76 of The Executive Program And Budget, Fiscal Year 2000, Volume II: Capital Program And Budget and Ordinance 99-27. For fiscal year 2001-02 to fiscal year 2004-05, table 6.1-12 on page 6-20 of the SDEIG.

A discussion should be provided on the need for much greater general obligation bond expenditures for the Refined BRT Alternative than past general obligation bond expenditures for

transit projects." The discussion especially should address whether general obligation bonds will have to be diverted from highway and other non-transit projects.

Assumptions Concerning Property Taxes

(49) The last paragraph on page 6-10 states:

With regard to the first constraint, the assumption is that property values will remain flat and that the City would maintain the current property tax rate. This creates a ceiling on the amount of General Obligation Bonds the City would be able to issue because it limits the City's debt service payment capacity to the current level of property tax revenues.

(A) An explanation should be provided to reconcile the assumption of flat property values and tax rates with the assumption of 1.5 percent annual increase of future outstanding general obligation bond debt. See the third paragraph of page 6-11 for the assumption on the 1.5 percent annual increase. In particular, the explanation should discuss the City's ability to pay increasing general obligation bond debt service when general revenues from property taxes are flat.

(B) If an adequate explanation cannot be provided, the reference to the assumption of flat property values and tax rates should be deleted.

Fare Increase

(50) The first full paragraph on page 6-12 states: "To meet the City's new farebox recovery policy the fares would need to increase slightly from those used in the financial analyses."

The necessary fare increase should be identified by year and amount. The City Administration also should consider proposing a bill to amend the transit fare schedule in Chapter 13, Revised

" A portion of the general obligation bond requirement is intended to fund the zipper lanes and direct access ramps for the Regional BRT highway system. An argument may be made that the portion should be considered an expenditure for "highways and streets." That argument, however, would be unconvincing. The major benefits of those facilities will be for transit, not regular traffic.

Ordinances of Honolulu 1990, to implement the necessary fare increase. The bill should have the appropriate future effective date.

Use Of City General Funds For Refined BRT Alternative

(51) According to table 6.1-5 on page 6-13, the City general fund requirement for transit operating and maintenance will be \$98,817,000 in fiscal year 2004-05 and \$132,813,000 in fiscal year 2009-10. Those amounts are much more than the past, current, and proposed City general fund subsidies for bus operating and maintenance, as shown in the following table.

It is noted that, for the fiscal years 2004-05 and 2009-10, part of the projected general fund subsidies possibly may be offset by City highway funds. See the next comment.

COMPARISON OF GENERAL FUND SUBSIDY  
FOR TRANSIT OPERATING AND MAINTENANCE  
(In Thousands Of Dollars)

	FY 00-01 Actual	FY 01-02 Estimated	FY 02-03 Proposed
General Fund Subsidy For Transit O&M	\$ 37,518	\$ 46,422	\$ 42,176
General Fund Subsidy For Transit O&M	FY 04-05 Projected \$ 98,817*	FY 09-10 Projected \$132,813*	

\* Portion of the amount possibly may be replaced by City highway funds.

Sources: For fiscal year 2000-01, page 79 of the Comprehensive Annual Financial Report For The Fiscal Year Ended June 30, 2001. For fiscal year 2001-02 and fiscal year 2002-03, page C-16 of The Executive Operating Budget And Program, Fiscal Year 2003, Volume I: Operating Program And Budget. For fiscal year 2004-05 and fiscal year 2009-10, table 6.1-5 on page 6-13 of the SBPIS.

An explanation should be provided of where the additional general fund subsidy in future years will come from. The explanation should be consistent with the assumption in the last

paragraph on page 6-10 "that property values will remain flat and that the City would maintain the current property tax rate." The explanation also should indicate whether transfers of City highway funds to the general fund are contemplated to ease the burden on the general fund in future years.

Probable Limited City Highway Fund Offset Of City General Fund Subsidy

(52) Chapter 6 and the cash flow analysis of table E-3 do not discuss or identify a possible City highway fund offset of the City general fund subsidy for the Refined BRT Alternative.

The following table estimates the amounts of City highway funds that may be available to offset part of the City general funds required for the operating and maintenance costs of the Refined BRT Alternative in fiscal year 2004-05 and fiscal year 2009-10. The methodology of the estimates is basically as follows:

- (A) The City highway funds proposed to be transferred to the bus transportation fund in fiscal year 2002-03 is escalated by 2.5 percent annually, the same inflation rate assumed in the SDEIS.
  - (B) The escalated City highway fund amounts for fiscal year 2004-05 and fiscal year 2009-10 are reduced by the City highway funds necessary in those fiscal years to pay the debt service and provide the local capital match for the Refined BRT Alternative. The debt service and local capital match amounts are identified in table E-3 on pages E-11 and E-12.
- The amounts remaining after the reductions are the net City highway funds estimated as available to offset the City general fund subsidies for the Refined BRT Alternative's operating and maintenance cost.

As is displayed, the net City highway funds available for the Refined BRT Alternative's operating and maintenance costs in fiscal year 2004-05 and fiscal year 2009-10 are much less than the City highway fund subsidy of \$33,991,000 for bus operating and maintenance proposed in fiscal year 2002-03.

ESTIMATE OF NET CITY HIGHWAY FUNDS AVAILABLE TO OFFSET PART OF CITY GENERAL FUND SUBSIDY FOR REFINED BRT ALTERNATIVE'S OPERATING AND MAINTENANCE COST (In Thousands Of Dollars)

	FY 04-05 Estimated	FY 09-10 Estimated
Escalated City Highway Funds Before Reduction For Debt Service And Local Capital Match (Based On 2.5% Annual Escalation Of \$33,991,000 Proposed City Highway Fund Transfer To Bus Transportation Fund In FY 02-03.)	\$35,712	\$40,405
Less City Highway Funds For:		
Debt Service For Post-2002 Bonds	\$23,272	\$25,698
Local Capital Match	\$ 3,265	\$ 8,116
Net City Highway Funds Available To Offset City General Fund Subsidy For Operating & Maintenance Cost	\$ 9,175	\$ 6,591

Sources: For the proposed \$33,991,000 City highway fund transfer to the bus transportation fund, page C-16 of the Executive Program And Budget, Fiscal Year 2003, Volume I: Operating Program And Budget. For debt service payments and local capital match, table E-3 on pages E-11 and E-12 of SDEIS.

The next table deducts from the projected City general fund subsidies for the Refined BRT Alternative's operating and maintenance costs the net City highway funds available for transit operating and maintenance. The table indicates that the City general fund subsidy for the Refined BRT Alternative's operating and maintenance will remain relatively large, even after the possible offset by available City highway funds. For awareness of the magnitude of the potential subsidy, the following is offered: the City general fund subsidy proposed in fiscal year 2002-03 to subsidize the bus system's operating and maintenance cost is \$42,176,020.<sup>11</sup>

<sup>11</sup> See page C-16 of The Executive Program And Budget, Fiscal Year 2003, Volume I: Operating Program And Budget.

PROJECTED CITY GENERAL FUND SUBSIDY,  
AFTER NET CITY HIGHWAY FUND OFFSET,  
FOR REFINED BRT ALTERNATIVE'S OPERATING AND MAINTENANCE  
IN FISCAL YEARS 2004-05 AND 2009-10  
(In Thousands of Dollars)

	FY 2004-05	FY 2009-10
Projected City General Funds Necessary For Refined BRT Alternative's Operating And Maintenance After Offset By City Highway Funds (Calculated As Follows: On Page 6-13 Of SDEIS Less Net City Highway Funds Available For Offset In Preceding Table.)	\$ 89,642	\$126,222
	(\$98,817 less \$9,175)	(\$132,813 less \$6,591)

City Highway Fund Growth Assumption

(53) Unlike the DEIS, the SDEIS does not discuss assumptions regarding the growth of the City highway fund. The assumptions are important since the conceptual capital funding plan proposes the use of City highway funds to pay the debt service incurred for the Refined BRT Alternative. Policy makers should be made aware of whether the City highway funds will have to be diverted from bus operations or other highway-related programs.

The following table displays the City highway fund revenues and percentage changes from the fiscal year 1995-96 through the fiscal year 2000-01.

CITY HIGHWAY FUND REVENUES  
(In Thousands of Dollars)

	FY 95-96	FY 96-97	FY 97-98
Revenues	\$ 96,974	\$ 97,513	\$ 99,129
% Change From Previous Year	0.07%	0.6%	1.7%
Revenues	FY 98-99	FY 99-00	FY 00-01
% Change From Previous Year	\$ 94,620 (4.5%)	\$ 94,275 (0.4%)	\$102,904 9.2%

\* The amount of revenues in fiscal year 1994-95 was \$96,908,000.

Sources: Pages with the income statements for the City highway fund in the Comprehensive Annual Financial Report for the pertinent fiscal years.

- (A) If the financial plan for the Refined BRT Alternative assumes a City highway fund growth rate inconsistent with the approximate 1.2 percent average annual rate in the table, justification for the assumption should be provided.
- (B) The City Administration's assumption on the growth rate of City highway fund expenditures for non-transit City programs also should be provided. Knowing the assumption should assist policy makers in determining whether the City highway fund will be sufficient to pay for both transit and non-transit programs. If the growth rate differs from the 2.5 annual inflation rate assumed for the SDEIS, the difference should be justified.

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TPD502-01835R

November 13, 2002

The Honorable Gary Okino  
 Member, City Council  
 City and County of Honolulu  
 Honolulu, Hawaii 96813

Dear Councilmember Okino:

Subject: Primary Corridor Transportation Project

This is in response to your May 7, 2002 letter regarding comments on the SDEIS.

1. The Refined BRT alternative is compared to the TSM Alternative described in chapter 2 of the DEIS. The TSM alternative is inadequate as the lower-cost baseline against which the Refined BRT Alternative should be compared. The inadequacy appears to produce an advantage for the Refined BRT alternative in a comparison of transit benefits.

Response: See responses to comments 1-A, B, and C below.

- a. Lack of P.M. Zipper Lane - Unlike the Refined BRT Alternative, the TSM Alternative does not include the P.M. contra-flow zipper lane on the H-1 freeway from Radford Drive to the Waiawa Interchanges. The lack of a P.M. zipper lane appears to negatively affect the transit travel times in the P.M. peak from Downtown to some Leeward Oahu sites under the TSM Alternative.

Response: Adding the P.M. zipper lane along H-1 from Radford Drive to and through the Waiawa Interchange onto H-2 will add \$109 million to the TSM Alternative costs in 2002 dollars. Since the TSM, by definition, consists of only low cost elements the P.M. zipper lane was not included.

- b. Lesser Bus Service - The TSM Alternative has less bus service than the Refined BRT Alternative. "Bus service" refers to service provided by minibuses, standard buses, and articulated buses, but not In-Town BRT vehicles. The following table compares the bus service under the original BRT Alternative and TSM Alternative. Comparison with the original BRT Alternative is necessary because of the unavailability of "bus service" data for the Refined BRT Alternative.

The Honorable Gary Okino  
 Page 2  
 November 13, 2002

COMPARISON OF "BUS SERVICE"  
 UNDER ORIGINAL BRT ALTERNATIVE  
 AND TSM ALTERNATIVE  
 In 2025

	Original BRT Alternative	TSM Alternative
Number of "Buses" (Minibuses, Standard Buses, Articulated Buses, But Not In-Town BRT Vehicles)	730	601
Annual "Bus" Revenue Miles	26,303,500	20,740,000
Annual "Bus" Revenue Hours	1,688,300	1,400,000

Sources: For the original BRT Alternative, Table 2.2-5 on page 2-18 of the DEIS and the response to question (22) on page 15 of the Communication D-840 (2000). For the TSM Alternative, Table 4.1-1 on page 4-3 of the SDEIS.

Response: As shown in the FEIS the TSM has service levels are closer to the Refined LPA:

	TSM Alternative	Refined LPA
Buses in Fleet	700	794
Annual Bus Miles	23.86 M	28.01 M
Annual Bus Hours	1.61 M	1.63 M

- c. Inadequate "Semi-Exclusive" Bus Lanes - the TSM Alternative does not have enough "semi-exclusive" bus lanes. For the Alternative, the third paragraph on page 2-15 of the DEIS states in part:

Semi-exclusive bus lanes would be placed on King Street and Beretania Street, between Middle Street and Waiālae Avenue. (Semi-exclusive bus priority lanes are lanes that would be reserved for buses, although vehicles turning into and out of driveways and turning right at intersections would be permitted to use them.) These bus priority facilities would generally operate only during peak periods.

"Semi-exclusive" lanes apparently are beneficial for fast transit travel times. Illustrative of this point is that "semi-exclusive" lanes will comprise "29 percent" of the In-Town BRT alignment. See the last paragraph on page 2-11 of the SDEIS.

If "semi-exclusive" lanes are beneficial for the In-Town BRT system, then they also should be beneficial for buses under the TSM Alternative. More "semi-exclusive" bus lanes under the TSM Alternative may have resulted in better transit travel times for patronage forecasting and, consequently, increased transit ridership.<sup>1</sup>

<sup>1</sup> Other streets, including Keolu Boulevard and Kuhio Avenue, will have "bus priority" lanes instead of "semi-exclusive" lanes. "Bus priority" lanes will have signal and other treatments favoring buses without restricting lane use.

**Response:** This is a statement regarding a preference for the number of "semi-exclusive" bus lanes. The TSM in the FEIS has 12.2 lane miles of exclusive and semi-exclusive lanes, whereas the Refined LPA has 17.2 lane miles of exclusive and semi-exclusive lanes. The No Build Alternative has only one mile of exclusive bus lanes (Hotel Street). This spread between the alternatives is consistent with the goal of having distinct alternatives.

2. The In-Town system does not directly connect Waikiki and the Convention Center. The omission seems inconsistent with the need to make the Convention Center more attractive to convention planners and attendees by providing better transit from Waikiki hotels.

**Response:** The public transit system is not designed to accommodate the surge loads that occur during major visitor events at the Convention Center. Private carriers with pre-arranged door-to-door service best handle these events.

3. In fact, the SDEIS and DEIS ignore the Convention Center as a tip attraction, despite its importance to the State economy. Table 3.3-6 on page 3-32 of the SDEIS does not list the Convention Center among the "major activity sites in the primary urban center DP area." Table 5.5-1 on page 5-4 of the SDEIS does not list the convention center among the "major destinations in the primary urban center." Moreover, the "screening of alternatives," commencing on page 2-41, of the DEIS does not even mention the Convention Center.

**Response:** The FEIS includes the Hawaii Convention Center on Table 3.3-6. The Convention Center is served by the Middle Street-UH branch with stops directly across from it. These stops are intended to serve Convention Center employees and local residents who attend events at the Convention Center. The public transit system is not designed to accommodate the surge loads that occur during major visitor events at the Convention Center. Transportation between Waikiki hotels and the Convention Center will continue to be best handled by pre-arranged services provided by private carriers.

4. An explanation of the reason for the absence of an In-Town BRT connection between Waikiki and the Convention Center should be provided.

**Response:** The response to question (20)(B) on page 14 of Communication D-840 (2000) indicates that a grade separation at the Kalakaua/Kapiolani intersection will be necessary to make the connection work. If that response is repeated, elaboration should be provided.

**Response:** This was intentional. The In-Town BRT could not handle the surge loads that occur during major visitor events at the Convention Center. Private carriers with pre-arranged door-to-door service best handle these events.

5. The first paragraph on page 2-9 summarizes the recommendations of the Pearl City/Alea Working Group. Basically, the Working Group recommends that transit centers be established in Pearl City and Alea and that contra-flow bus operation during the peak periods link the transit centers with the Regional BRT at Luapele Drive. The paragraph also states: "The DTS is programming these projects into the City Capital Improvement Program (CIP) as separate projects from the BRT since they have independent utility."

The transit service recommended by the Pearl City/Alea Working Group will serve the area being evaluated under the Primary Corridor Transportation Project. The capital cost, operating and

maintenance cost, and transit ridership resulting from the recommendations should be included in the FEIS for the Refined BRT Alternative. Such data are necessary to display the system-wide costs and benefits.

**Response:** There are a number of transit centers, park-and-rides and other transit related improvements that complement the Refined LPA that are proceeding as separate projects. These include the transit centers in Pearl City and Waimalu, as well as transit centers and/or park-and-rides in Waiānae, Kaneohe, Wahiawa, Miliani, Kāhala, and Kaimuki. In addition, the parking associated with the Middle Street and Hotel Transit Centers will be implemented as separate projects from the Refined LPA.

While the capital costs for these complementary projects are not included as PCTP costs in the financial plan for the Refined LPA, they are reflected in the system-wide ridership forecasts.

As stated in the SDEIS, the transit improvements recommended by the Working Group have independent utility, indicating that the recommended improvements will be beneficial for the community with or without the BRT project. Therefore, the recommended Kamehameha Highway improvements will be assessed in detail in a separate study. As part of the Fiscal Year 2003 budget, the City Council approved the funding for the planning study for the Kamehameha Highway Transit Corridor and Transit Centers (CIP Project No. 2003043).

6. The last paragraph on page 2-11 and first paragraph on page 2-12 states: "Along about 38 percent of its length, the In-Town BRT system would run in transit lanes in the median of existing arterial roads (e.g., sections of Kapiolani and Dillingham Boulevards). Along 29 percent of the alignment, the system would run along the curb in semi-exclusive lanes. Semi-exclusive lanes would be shared with right-turning vehicles, and in the case of Waikiki with other buses (public and private) and trolleys. For the remaining one-third of the alignment the BRT would operate in mixed traffic."

A description should be provided of the plan to enforce proper use of the "exclusive" and "semi-exclusive" lanes. Enforcement appears imperative if the In-Town BRT vehicles are to achieve fast travel times.

**Response:** The bus priority lanes will be clearly delineated with raised lane markers, colored pavement, and signage. Enforcement will be performed by the HPD similar to enforcement on the existing bus priority lanes on Hotel Street, Kalakaua Avenue, and the HOV and Zipper lanes on H-1 and H-2. A strict low-away policy will also be enforced.

7. A "semi-exclusive" lane apparently is intended to enable faster transit travel times than a "mixed traffic" lane. For practical purposes, however, both a "semi-exclusive" lane and "mixed traffic" lane will be usable by In-Town BRT vehicles and other types of vehicles, including autos. If the proper use of a "semi-exclusive" lane is not constantly enforced, then there will be no difference from a "mixed traffic" lane.

**Response:** See response to comment #6.

8. Better justification should be provided for differentiating between a "semi-exclusive" lane and "mixed traffic" lane. If there will be no difference under actual operational conditions, then all lanes not exclusive to In-Town BRT vehicles should be deemed "mixed traffic" lanes in the FEIS and designated "general purpose" lanes in Table 2.2-4 on Page 2-21.

**Response:** There is a difference in the performance of a semi-exclusive lane during periods of high congestion. During these periods, vehicles in general traffic lanes often have to wait through at least one and often several signal cycles before advancing through an intersection. During this same period, the transit vehicles in the semi-exclusive lane, will only need to wait for the right-turning vehicles to clear the intersection, then they can proceed through the intersection since there would be no traffic backed up on the other side.

9. The 1990 AADEIS for the rapid transit project designates "exclusive transit lanes" on certain urban streets. Concerning the operation of those lanes, the Department of Transportation Services in 1990 responded to certain questions submitted by the Council. See page 2 of Communication D-358 (1990), Managing Director's reference "MD-7-03138."

Basically, the 1990 responses indicate that a street lane reserved for buses and right-turning vehicles would not result in bus travel times faster than under "current" operation. The following are the questions and responses:

(3) On page 2-4, in figure 2.1 of the AADEIS, exclusive transit lanes are depicted on Beretania Street, Alakea Street, King Street, Keolu Street, and Kalakaua Avenue.

(A) Please describe the planned operation of the exclusive transit lanes, especially during the peak periods.

The exclusive transit lanes depicted on Beretania Street, Alakea Street, King Street, Keolu Street, and Kalakaua Avenue are a formalization of the de facto exclusive bus lanes currently in operation. The exclusive bus lanes will be in effect for the peak period and in the peak direction only. They will be for the exclusive use of buses and right-turning vehicles. (Underscoring added)

2 The "de facto" operation refers to the situation under which the right lane of a street is used only or mainly by buses and right-turning vehicles. Through-moving vehicles generally prefer and use other lanes to avoid the frequent stops and slow speeds of buses in the right lane.

(B) Under the operating plans of all alternatives, is transit travel time in buses based on the use of the exclusive transit lanes?

The transit travel time in buses using the exclusive transit lanes would not change because there would be no speed change as compared to the de facto condition. (Underscoring and footnote added.)

Similar to the designated transit lanes in the 1990 AADEIS, the "semi-exclusive" lanes for the In-Town BRT system would be shared with right-turning vehicles, and in the case of Waikiki with other buses (public and private) and trolleys. See the first paragraph on page 2-12 of the SDEIS.

Based on the Department of Transportation Services' 1990 responses then, an In-Town BRT vehicle using a "semi-exclusive" lane should experience "no speed change as compared to the de facto condition" under current operation. The current condition for buses on roadways and highways is described in the last paragraph on page 1-12 of the SDEIS. The decline of the average operating speeds of buses is described in the fourth paragraph on page 3-16 of the SDEIS.

A discussion should be provided on whether an In-Town BRT vehicle in a "semi-exclusive" lane is expected to operate at a faster speed than a bus currently operating in the right lane. If the contention is that the In-Town BRT vehicle will be faster, the reason for the departure from the above quoted 1990 responses should be specified.

**Response:** The conditions described in the 1990 response are different from what is being proposed in the Refined LPA. The reason the lanes were referred to as de facto semi-exclusive lanes in the 1990 response is that these lanes currently carry so many local buses which make frequent stops that many through motorists avoid them.

The proposed semi-exclusive lanes in the current plan differ in that the BRT will replace many of the local buses on the streets where semi-exclusive lanes are proposed and the BRT buses will be operating with limited stops. The dwell times at the BRT stops will also be less than today at the local bus stops, since passengers, including the disabled will be able to board from platforms at the same height as the low-floor vehicles and they will be able to enter and exit from any door. Also, the doors themselves will be wider than on the current buses. All of these factors will result in average travel speeds of 12-15 mph in the semi-exclusive lanes compared to the average bus operating speed in town of 8-9 mph today.

10. The response to question (3)(A) on page 2 of Communication D-840 (2000) addresses bus routes under the original BRT Alternative. It states in part: "Circulator services would also be offered along the BRT route to serve passengers who find the station spacing of the BRT inconvenient for their trip."

The statement or a similar one should be added to the bus route description for the Refined BRT Alternative on page 2-5 of the SDEIS.

**Response:** A statement to this effect is included in Chapter 2 of the FEIS.

11. A discussion also should specify whether the circulator bus service will be provided on portions of the In-Town BRT alignment where only one general purpose traffic lane will be available per direction.

**Response:** Local trunk and circulator bus service will be offered along the BRT route to serve passengers who find the station spacing of the BRT inconvenient for their trip. To lessen the impact of local trunk and circulator buses on these segments, treatments such as bus bays and curb lane widening are proposed as part of the Refined LPA.

12. The discussion also should explain the "0" or very few "bus arrivals" at In-Town BRT stations on Dillingham Boulevard, the King Street section Koko Head of the Alapai stop, the Keolu Boulevard section Ewa of the Isenberg stop, and Kuliou Avenue. See Table 4.1-8 on Page 4-9.

**Response:** Table 4.1-8 in the SDEIS is now Table 4.3-7 in the FEIS. This table identifies the mode of access to the proposed In-Town BRT. The bus mode refers to riders that access the BRT by transferring from a bus. In Table 4.3-7, there are several stations that exhibit high bus to BRT transfers: Middle Street, Kaili, Union Mall, Alapai Transit Center, Thomas Square, McKinley High School, Isenberg, University/King, UH-Manoa, Cooke Street, Saratoga Road, and Kapahulu Avenue. These stations are located where other local bus routes intersect with the In-Town BRT routes. Other locations have high passenger activity but little bus to BRT transfer activity.



Examples of these locations are Honolulu Community College, Iwilei Transit Center, Chinatown, Iolani Palace, Ala Moana Center (Kapoli), Ala Moana Park (Ala Moana Blvd), and several others.

13. The first paragraph on page 2-25 discusses the "final technology selection for In-Town BRT." A portion reads: "During the next year or so, it is anticipated that both the embedded plate and hybrid diesel/electric technologies will advance to a state where they will be considered service proven. At that time, a decision on technology may be made."

a. A "year or so" does not seem sufficient to determine whether a technology really is "service proven." Support should be provided for the contention that a technology can be "service proven" so soon. A description also should be provided of the factors a technology must comply with in order to be considered "service proven."

Response: Since implementation of STREAM technology in Trieste, Italy was delayed, the decision on which technology to use for the In-Town BRT in Honolulu will be postponed until 2008. By this time STREAM and possibly other embedded plate systems will have been in revenue service for over 2-5 years, which is ample time to consider them service proven.

A system is considered "service-proven" when the vehicles and associated on-board technology, including all major subsystems, have been successfully proven in current, daily, year-round passenger service operation for a period of approximately two years. Successful passenger service operation means that the responsible transit agency has verified that the manufacturer has met original expectations in writing. Experience of full-scale equipment integration operating on a test track may be considered as equivalent to passenger service operation. The manufacturer must be able to demonstrate the capability to successfully support the operation and maintenance of the vehicle and associated systems by verification of successful support of a similar system of equivalent magnitude and complexity. The manufacturer's key engineering leaders who are (or will be) working on the system shall demonstrate direct technical experience with the specific vehicle and propulsion technology. The manufacturer must also have available facilities sufficient to produce and supply the vehicles, the associated on-board vehicle subsystems, and the power distribution equipment. Facilities shall include a fully equipped manufacturing plant with adequate and available production capacity and test facilities to test all critical subsystems as full-scale production units.

b. The City Administration is requesting design and construction funds for the In-Town BRT system in the fiscal year 2002-03 capital budget bill, although a technology has not been selected as yet. A justification of the funding request should be provided.

Response: The "technology" selection is not a prerequisite for the initial implementation of In-Town BRT because any "technology" to propel the bus vehicles will be compatible with the In-Town BRT operation and service. The SDEIS included detailed assessments of the various bus vehicle propulsion and electrical power delivery technologies to disclose their unique environmental effects.

c. A description of the roadway construction work necessary for each technology should be provided. Responses to question (37) on pages 23 and 24 of Communication D-840 (2000) summarize what the work needed for the embedded plate technology and hybrid propulsion technology. More construction work appears to be necessary for the embedded plate technology.

Response: Descriptions of the construction required with each technology is included in Chapter 2 of the FEIS. The EPT would require more construction work than hybrid-electric technology.

14. Figure 2-5-1 on page 2-27 shows the project implementation schedule. The "Kalihi segment," "Waikiki segment," and "Kakaako Makai segment" of the In-Town BRT system are programmed to commence in 2002.

In the fiscal year 2002-03 capital budget bill, however, the City Administration is requesting design and construction appropriations for the "Iwilei to Waikiki alignment."

An explanation should be provided on why funding is not being requested for the "Kalihi segment" in the fiscal year 2002-03 capital budget bill. The "Kalihi segment" seems the obvious starting point since Middle Street will serve as the beginning of the alignment and storage/maintenance yard for In-Town BRT vehicles.

Response: The Iwilei-Waikiki segment is scheduled as the first increment of the In-Town BRT since:

- It could operate as a stand alone line as well as part of the In-Town system;
- It could help connect many existing and planned major travel generators along the waterfront that are not well served by transit now, and
- It is very cost-effective in terms of cost per mile of construction.

15. Starting at Middle Street appears to be necessary for the embedded plate technology. The first full paragraph on page 5-3 states: "Additionally the embedded plate vehicles need to travel in the transit lane where the embedded plates are located (other than for short distances where battery back-up can be used)."

Response: A decision on whether to use EPT will be made in 2008. In the interim hybrid-electric technology will be used. This will permit phasing construction of the In-Town BRT starting with the Iwilei-Waikiki branch.

16. Figure 2-5-1 on page 2-27 shows that the "Waikiki segment" and "Kakaako Makai segment" are programmed to be commenced and completed earlier than the "Midtown-UH segment" and "Kakaako Mauka segment." This seems disjointed.

An explanation should be provided on why the In-Town BRT segments are not programmed for completion in continuous segments from Middle Street.

Response: See response to comment #14, above.

17. The last paragraph on page 4-1 states: "The Refined BRT Alternative would improve the person carrying ability within the Urban Core by an average of 11 percent over the No-Build Alternative. To get an equivalent increase in general-purpose throughput, two roadway lanes in each direction

would need to be provided in the Urban Core, which is impossible to do without major displacements. The method of calculating the "two roadway lanes in each direction" is not included in the SDEIS or Travel Forecasting Results Report.

Experimentation indicates that the calculation is based on the data in Table 4.2-1 on page 4-12 concerning the "projected 2025 A.M. peak hour person carrying capacity at selected screening locations" the average occupancy of an auto, and the capacity of a freeway lane designed for a speed of 50 miles per hour at level of service E.

The statement that the No-Build Alternative will require "two roadway lanes in each direction" is inappropriate for a technical document. The calculation method is not provided and the imagery of a three-dimensional four-lane highway is a misrepresentation.

<sup>3</sup> Parsons Brinckerhoff Quade & Douglas, Inc., prepared for the City Department of Transportation Services, Technical Memorandum on Travel Forecasting Results, Product 7-19, October 2000.

<sup>4</sup> The formula appears to be as follows: Number of Lanes = [Refined BRT Alternative Person Carrying Capacity Across Screening in Table 4.2-1 - No-Build Alternative Person Carrying Capacity Across Screenings in Same Table] / 1.4 Average Persons Per Auto Occupancy / 1,900 Passenger Cars Per Hour Per Lane Of Capacity Of One Freeway Lane Designed For 50-MPH At Level Of Service E.

Response: The FEIS discusses this issue in Section 4.4.2.3.c. Table 4.4-7, Person Throughput Capacity on Kapiolani Boulevard between Pensacola Street and Atkinson Drive, compares the three Alternatives. The transit persons per hour are based on the projected bus and BRT service, while auto persons per hour are based on the projected P.M. peak hour vehicular assignment multiplied by 1.2 persons per vehicle. The average bus and BRT occupancies are shown as 70 and 100 persons per vehicle, respectively. Based on these estimates, the total persons per hour are calculated. As shown in Table 4.4-7, the Refined LPA has the potential to carry 8 to 12 percent more persons per hour than the TSM or No-Build Alternatives along this segment during the P.M. peak hour.

18. The second paragraph on page 4-5 states: "The Kakaako Makai Branch of the Refined BRT would account for 7,400 of the In-Town BRT daily trips, or about 9 percent of the total BRT boardings." The last paragraph on page 4-2, however, states: "This [Kakaako Makai Branch] alignment, beginning at the Hotel Transit Center with a terminus in Waikiki would add approximately 3,700 transit boardings per day to the total transit boardings per day to the total transit boardings for the In-Town BRT."

The discrepancy in the Kakaako Makai Branch trips should be clarified.

Response: The two statements in the SDEIS are not a discrepancy. The first statement was referring to the total number of boardings on the Kakaako Makai branch. The second statement was referring to the number of these boardings that would be new trips in addition to the trips on the In-Town BRT system if there were no Kakaako Makai branch. The more recent forecast of transit boardings is shown in Table 4.3-9 of the FEIS.

19. The fourth paragraph on page 4-6 describes Table 4.1-6 on "Transit travel times within the urban core." A sentence reads: "These travel times are a composite of A.M. and P.M. peak period time in each corridor."

An explanation should be provided of (A) how "composite" travel time was determined and (B) why "composite" travel time was used.

More importantly, Table 4.1-6 should provide the "non-composited" A.M. peak and P.M. peak transit travel times for each of the origin-destination pairs.

Response: Table 4.1-6 in the SDEIS is now Table 4.3-5 in the FEIS. The table has been revised to show only the P.M. peak hour time period and now shows total transit travel time, which includes out of vehicle time (wait time, walk time, transfer time) as well as in-vehicle time.

20. Table 4.1-6 on page 4-7 shows the "Downtown-Kapolei" transit travel times in 2005 for the Alternatives. The following are the travel times.

IN-VEHICLE TRANSIT TRAVEL TIMES  
DOWNTOWN TO KAPOLEI  
IN PEAK PERIOD (in 2005)

	No-Build	TSM	Refined BRT
Downtown to Kapolei	53.7 minutes	45.5 minutes	36.8 minutes

Source: Table 4.1-6 on page 4-7 of the SDEIS.

The title of table 4.1-6 indicates that it provides "in vehicle time," apparently meaning only the time spent riding a transit vehicle. If that interpretation is correct, then transfer time is not included in the table.

\*"Downtown" is the approximate area of "Fort St. Mall between Hotel & King" and "Kapolei" is the residential area "bounded by Fannington/Kaialana/Kamaeha/FL Barrette." See the response to question 25(B) on page 17 of Communication D-840 (2000).

Response: See response to comment #19.

21. Logic indicates that the "Downtown to Kapolei" trip under the Refined BRT Alternative will require a transfer at the Middle Street transit center from an In-Town BRT vehicle to an express bus. Logic also indicates that the same trip under the No-Build Alternative and TSM Alternative will not require a transfer. A person is assumed able to ride an express bus directly from Downtown to Kapolei under either Alternative.

The response to question (23)(D) on page 15 of Communication D-840 states that, under the patronage forecasting methodology, a "transfer penalty of 6 minutes was used." A six-minute transfer time appears reasonable for a P.M. outbound trip because of the longer express bus headways, but too much for an A.M. inbound trip because of the two-minute In-Town BRT headways. Thus, in the following, a range of two to six minutes, signifying transfer time, is added to the in-vehicle travel time for the Refined BRT Alternative.

TRANSIT TRAVEL TIMES  
DOWNTOWN TO KAPOLEI  
IN PEAK PERIOD  
(in 2025)

	No-Build In- Vehicle Time)	TSM (In- Vehicle Time)	Refined BRT (In-Vehicle Time Plus 2- Minute Transfer Time)
Downtown to Kapolei	53.7 minutes	45.5 minutes	36.8 to 42.8 minutes

Table 4.1-6 should include the transfer time for the "Downtown to Kapolei" trip under the Refined BRT Alternative. If the times in the above table are correct, they should be included in the FEIS. If not, the correct times should be provided.

Response: See response to comment #19.

22. Table 4.1-6 on page 4-7 shows the "Downtown-Waikiki" transit travel times in 2005 for the Alternatives. The times are about the same for the TSM Alternative and Refined BRT Alternative.

IN-VEHICLE TRANSIT TRAVEL TIMES  
DOWNTOWN TO WAIKIKI  
IN PEAK PERIOD  
(in 2025)

	No-Build In- Vehicle Time)	TSM (In- Vehicle Time)	Refined BRT (In-Vehicle Time Plus 2- Minute Transfer Time)
Downtown to Waikiki	18.7 minutes	15.8 minutes	15.7 minutes

Source: Table 4.1-6 on page 4-7 of the SDEIS.

The routes of the "Downtown-Waikiki" trip under the No-Build Alternative and TSM Alternative should be described. Of interest is whether the routes operate in a limited stop or trunk route manner.

"Downtown" is the approximate area of "Fort St. Mall between Hotel & King" and "Waikiki" is the approximate area bounded by Kalanianaʻohale/Kaliuli/Duke's Lane." See response to Question 25(B) on Page 17 of Communication D-840 (2000).

Response: Table 4.1-6 in the SDEIS is now Table 4.3-5 in the FEIS. An explanation of the difference in the tables is contained in the response to question #19. Additionally, the SDEIS used year 1997 as its base year, where the FEIS uses year 2000 as its base year. This change was made to be consistent with the Oahu Metropolitan Planning Organization (OMPO) TOP 2025 that used year 2000 as its base year. Since the year 2000 bus system contains more limited stop bus routes, the No-Build Alternative in the FEIS also contains more limited-stop buses than in the SDEIS. As a result, the projected year 2025 transit travel time difference between the No-Build Alternative and the Refined LPA are closer in the FEIS than in the SDEIS.

23. Table 4.1-6 on page 4-7 shows that the "Downtown - Kalihi" transit travel times in 2005 for the Alternatives. The times are about the same.

IN-VEHICLE TRANSIT TRAVEL TIMES  
DOWNTOWN TO KALIHI  
IN PEAK PERIOD  
(in 2025)

	No-Build In- Vehicle Time)	TSM (In- Vehicle Time)	Refined BRT (In-Vehicle Time Plus 2- Minute Transfer Time)
Downtown to Kalihi	7.9 minutes	6.8 minutes	5.1 minutes

Source: Table 4.1-6 on page 4-7 of the SDEIS.

a. The routes of the "Downtown-Kalihi" trip under the No-Build Alternative and TSM Alternative should be described. Of interest is whether the routes operate in a limited stop or trunk route manner.

"Kalihi" is the approximate area bounded by Waikamoi/Kalihi/Dillingham/Ackelill." See the response to questions 25(B) on page 17 of Communication D-840 (2000).

Response: See response to comment #22.

b. A discussion should be provided of the transit travel time under the Refined BRT Alternative if Dillingham Boulevard is assumed to have two general-purpose lanes in each direction instead of one exclusive In-Town BRT lane/one general-purpose lane in each direction. The intent is to examine whether an In-Town BRT vehicle will lose substantial travel time if operating in a general-purpose lane.

Response: Table 4.3-5 has travel times for the three proposed alternatives. Travel time differences on the segment between Middle Street Transit Center and Downtown are relatively small for the three alternatives. This is due to the short distance (about 3 miles) for the segment evaluated. This segment is the only In-Town BRT segment where all BRT lanes are running on the same alignment. The effective headway between BRT vehicles during the peak periods is less than 1 minute. In this environment, the reliability of transit movement is important. On the average, the No-Build and TSM Alternatives could maintain transit speeds that are only slightly slower (3 to 4 mph) than the Refined LPA. However, this may not be the condition throughout the peak period. A momentary breakdown of flow during the peak period has the potential of disrupting the high throughput of the BRT vehicles. The exclusive BRT lanes will provide more consistent travel times for the BRT vehicles, allowing them to maintain their high rate of flow as they transition from the freeway zipper lane to the In-Town system.

24. The following table compares the in-vehicle transit travel times from Downtown to UH-Manoa for the Alternatives under the SDEIS and the Travel Forecasting Results Report.

"UH-Manoa" is the "U.H. Upper Campus." See the response to question (25)(B) on page 17 of Communication D-840 (2000).

COMPARISON BETWEEN SDEIS AND TRAVEL FORECASTING RESULTS REPORT  
IN-VEHICLE TRANSIT TRAVEL TIMES  
DOWNTOWN TO UH-MANOA  
IN 2025

SDEIS (Composite Peak Period)	No-Build minutes	TSM minutes	BRT minutes
Travel Forecasting Results Report P.M. Peak Period	13.7 minutes	13.7 minutes	12.6 minutes

Sources: Table 4.1-6 on page 4-7 of the SDEIS. Table 4-5 of the Travel Forecasting Results Report.

The correct "Downtown to UH-Manoa transit times should be provided in Table 4.1-6. An explanation for the discrepancy also should be provided.

Response: The updated transit travel times are shown in Table 4.3-5 in the FEIS. The latest results are based on the refined travel demand model from the Oahu Metropolitan Planning Organization (OMPO). This model was used for the TOP 2025 regional transportation plan update. When this refined model became available, the Primary Corridor Transportation Project switched to it to maintain consistency with OMPO.

25. Table 4.1-6 on page 4-7 does not describe the bus routes from "Downtown to UH-Manoa" for the No-Build Alternative or TSM Alternative.

The routes of the "Downtown to UH-Manoa" bus trip under the No-Build Alternative and TSM Alternative should be described. Of interest is whether the routes operate in a limited stop or trunk route manner with or without a transfer at University Avenue to the UH campus.

Response: The travel time shown in Table 4.1-6 in the SDEIS and the updated travel time shown in Table 4.3-5 in the FEIS reflect the express bus Route A which is a limited stop route.

26. Much of the transit ridership and costs of the Refined BRT Alternative is due to the increased bus fleet and service supply. The Refined BRT Alternative has a total of 336,700 daily transit trips, according to Table 4.1-2 on page 4-4. Of that amount, only 75,600 or 22.5 percent involve a boarding on an in-Town BRT vehicle, according to Table 4.1-4 on page 4-5. The other 261,100 or 77.5 percent of the trips apparently involve a bus only ride. The following places the data in tabular form.

TOTAL DAILY TRANSIT TRIPS  
TRIPS WITH IN-TOWN BRT BOARDINGS AND BUS-ONLY TRIPS  
(In 2025)

Total Daily Trips	Trips With In- Town BRT Boardings	Bus-Only Trips (Trips Without In-Town BRT Boardings)
336,700	75,600	261,100
100%	22.5%	77.5%

Sources: Table 4.1-2 on page 4-4 and Table 4.1-4 on page 4-5 of the SDEIS.

Chapter 4, however, does not provide data on transit travel times involving bus-only trips.

Because of the importance of the bus service assumed in the SDEIS, transit travel times between selected origins and Downtown should be provided for trips that will not involve a boarding on the In-Town BRT system.

Response: Table 4.2-1 in the FEIS shows projected daily system-wide transit trips. As in the earlier versions, this table includes all linked trips made by transit. One linked transit trip describes a trip made from origin to destination, regardless of the number of transfers made. Boardings describe the number of times someone boards a particular route. Because one linked trip may use more than one transit route, there are typically more boardings than linked transit trips shown in system-wide ridership. The BRT is not a separate system but part of the comprehensive island-wide transit system. The function of the BRT routes is to provide frequent, higher speed service in heavily travel corridors. The transit system is designed to interconnect with the BRT routes using local and circulator buses.

27. Chapter 4 does not include data on auto travel times under the Refined BRT Alternative.

The following tables compare in-vehicle transit travel times and auto travel times under the Refined BRT Alternatives between assumed suburban transit facilities and Downtown during the peak hours. Sources of the in-vehicle transit travel times and auto travel times are the tables attached to Communication D-840 (2000) in response to question (26) on page 18. The transit travel time table attached to the Communication, however, does not appear to include the transfer times, when applicable, for the transit trips. The table also does not appear to include wait times at the beginning of the transit trips and walk times at the end of the trip.

The tables, with adjustments for transit transfer times if appropriate, should be included in the FEIS. The data are important for public awareness of the differences in travel times under the transit and auto modes.

Travel times between the Pearl City/Aiea transit center and Downtown are not included in the following tables. The times set forth in the tables attached to Communication D-840 (2000) apparently assumed the transit center to be at the Kam Drive-in site. That site is no longer under consideration for a transit center.

The table is entitled "In-Vehicle Transit Travel Time To and From Downtown (TAZ 255) (underscoring added)." A transfer adds time to a trip. The response to question (23)(D) of Communication D-840 (2000) states: "[t]he transfer penalty of 6 minutes was used" in the patronage forecasting methodology.

The tables also may serve another purpose. Policy makers and the public may review the travel times, especially auto travel times, and judge whether the times are logical for the hypothetical traffic situation in 2025 based on experience in actual current traffic.

COMPARISON OF IN-VEHICLE TRANSIT TRAVEL TIME AGAINST AUTO TRAVEL TIME UNDER REFINED BRT ALTERNATIVE TO DOWNTOWN DURING A.M. AND P.M. PEAK HOURS IN 2025

A.M. Peak	In-Vehicle Transit Travel Time	Auto Travel Time	Difference Total Transit Travel Time Minus Auto Travel Time
Kapolei Transit Center	37.6 mins.	43.8 mins.	(6.2) mins.
Waiānae Transit Center	67.6 mins.	79.1 mins.	(11.5) mins.
Waipahu Transit Center	26.5 mins.	39.3 mins.	(12.8) mins.
Kaneohe Transit Center	29.2 mins.	24.4 mins.	4.8 mins.
Wahiawa Town Transit Center	37.0 mins.	46.3 mins.	(9.3) mins.
Māliani Town Transit Center	35.4 mins.	43.5 mins.	(8.1) mins.
Kaliua Transit Center	26.2 mins.	27.5 mins.	(1.3) mins.
Wahiawa Park - and - Ride	32.5 mins.	44.4 mins.	(11.9) mins.
Māliani Mauka Park - and - Ride	30.8 mins.	42.5 mins.	(11.7) mins.
Royal Kunia Park - And - Ride	28.1 mins.	39.9 mins.	(11.8) mins.
Hawai'i Kai Park - And - Ride	23.5 mins.	21.6 mins.	3.9 mins.
P.M. Peak	In-Vehicle Transit Travel Time	Auto Travel Time	Difference Total Transit Travel Time Minus Auto Travel Time
Kapolei Transit Center	41.0 mins.	42.1 mins.	(1.1) mins.
Waiānae Transit Center	68.6 mins.	76.9 mins.	(8.3) mins.
Waipahu Transit Center	32.5 mins.	40.5 mins.	(8.0) mins.
Kaneohe Transit Center	32.4 mins.	24.2 mins.	8.2 mins.

Wahiawa Town Transit Center	37.7 mins.	44.3 mins.	(6.6) mins.
Māliani Town Transit Center	39.5 mins.	41.1 mins.	(1.6) mins.
Kaliua Transit Center	28.0 mins.	22.6 mins.	5.4 mins.
Wahiawa Park - and - Ride	39.0 mins.	41.4 mins.	(2.4) mins.
Māliani Mauka Park - and - Ride	33.2 mins.	39.8 mins.	(6.6) mins.
Royal Kunia Park - And - Ride	37.9 mins.	40.8 mins.	(2.9) mins.
Hawai'i Kai Park - And - Ride	28.8 mins.	22.3 mins.	6.5 mins.

Response: In response to your comments, auto travel times for the same origins and destinations as the transit travel times have been added to Chapter 1 of the FEIS.

28. The first paragraph on page 4-13 discusses the "vehicle miles traveled" and "vehicle hours of delay" for all Alternatives. The paragraph notes that the Refined BRT Alternative will have fewer "vehicle hours of delay" than the No-Build Alternative. The paragraph, however, does not compare the Refined BRT Alternative with the TSM Alternative regarding "vehicle hours of delay."

Table 4.2-2 on page 4-13 provides the following data on "vehicle hours of delay" during the peak periods for the TSM Alternative and Refined BRT Alternative.

COMPARISON OF PROJECTED PEAK PERIOD VEHICLE HOURS OF DELAY FOR TSM ALTERNATIVE AND REFINED BRT ALTERNATIVE IN 2025

Time Period	TSM Alternative	Refined BRT Alternative
Vehicle Hours of Delay	112,708	114,785
A.M. Peak	124,036	128,477
P.M. Peak	236,744	243,261
Total Peak		(As is in the SDEIS.)

Source: Table 4.2-2 on page 4-13 of the SDEIS.

The discussion should indicate that the Refined BRT Alternative will have more "vehicle hours of delay" in the peak periods than the TSM Alternative.

Response: Table 4.2-2 in the FEIS shows the updated VMT (Vehicles Miles of Travel) and Vehicle Hours of Delay (VHD) results. The LPA will have fewer Vehicle Hours of Delay than either the No-Build or the TSM Alternative in the A.M., P.M., and Off Peak.

29. Table 4.2-7 on page 4-19 displays the levels of service during the peak periods at various intersections.

The table should include levels of service for the following:

- (A) Intersections adjacent to Regional BRT transit centers/park-and-ride facilities that are expected to attract substantial bus trips; and
- (B) More Dillingham Intersections; and
- (C) Kapiolani Boulevard Intersections situated Koko Head of the Kalaka'au Avenue Intersection.

Response: (A) Many of the transit centers and park-and-rides that will be used by the Regional BRT are proceeding as independent projects that will be built even without the BRT as a complement to the hub-and-spoke program. Separate environmental assessments, including traffic impact analyses, are either currently being prepared or will be prepared for these transit centers and park-and-rides.

(B) The Dillingham Boulevard corridor has been extensively studied for the FEIS. Section 4.4.2-1 is devoted to this corridor. Table 4.4-5 in the FEIS includes the traffic analysis of intersections along Dillingham Boulevard.

(C) Kapiolani Boulevard, Koko Head of Kalaka'au Avenue, is considered to be equal in all three alternatives since there is no lane priority for BRT vehicles between Alukson Drive and University Avenue. In all three alternatives therefore, the same traffic level of service will exist influenced by the three intersections leading into Waikiki; Kapiolani Boulevard intersecting with Kalaka'au Avenue, McCully Street, and University Avenue.

30. Table 4.1-8 on page 4-9 shows the "drive" mode of arrivals at In-Town BRT stations. Table 4.3-1 on page 4-23 shows the number of park-and-ride stalls at In-Town BRT stations. The following table combines the data.

IN-TOWN BRT STATIONS  
DRIVE MODE OF ARRIVALS AND NUMBER OF PARKING STALLS

Station	Drive Arrivals (in 2025)	Parking Stalls
Middle Street	1,691	1,000
Honolulu Community College	307	300 (For "Kalihi Park - and - Ride")
Iwilei	305	300
Saraloga	1,276	7

\* See the response to question (30) (A) on page 20 of Communication D-940 (2000). Regarding the Kalihi park-and-ride facility, the response states: "The park-and-ride facility is located in the vicinity of Honolulu Community College."

Sources: Table 4.1-8 on page 4-9 and table 4.3-1 on page 4-23 of the SEIS.

All "drive arrivals" at each station appear to be "park-and-ride" arrivals rather than "kiss-and-ride" arrivals. This conclusion is reached because only stations with parking stalls have "drive arrivals."

a. Justification for Iwilei and Honolulu Community College Park-and-Ride Facilities - The Iwilei and Honolulu Community College park-and-ride facilities are very near Downtown and relatively near other major urban employment areas. According to the response to question (30) (B) on page 20 of Communication D-940 (2000), the City Administration expects people to drive to those facilities, park their autos, and then ride an In-Town BRT vehicle to their destinations. The City Administration states: "Since downtown parking is not paid for or provided by all employers, some employees would choose to park in lower-priced peripheral parking and use transit to complete their journey to work." This strategy for park-and-ride facilities so near Downtown seems inconsistent with the intent of diverting people from autos to transit and reducing auto traffic congestion in the urban core.

Better justification for the Iwilei and Honolulu Community College park-and-ride facilities should be included in the FEIS so that policy makers and the general public may decide if the facilities are necessary.

Response: The HCC park-and-ride facility has been dropped from the FEIS. The park-and-ride at the Iwilei Transit Center is still viewed as a way to intercept motorists at the perimeter of Downtown and by capturing these autos outside of Downtown reducing congestion and freeing up land in Downtown for more productive and pedestrian friendly uses.

b. Enforcement of Honolulu Community College Park-And-Ride Facility - As the previous discussion indicates, the City Administration intends the Honolulu Community College park-and-ride facility to be used to intercept Downtown employees who drive to work. Logic, however, indicates that the facility will be very attractive to Honolulu Community College students.

A discussion should be provided on the plan to enforce the proper use of the Honolulu Community College park-and-ride facility. The discussion should describe the plan for preventing a student from parking the student's auto at the facility and walking to attend class.

Response: The Honolulu Community College Park-and-Ride has been dropped from the project.

c. Enforcement of Iwilei Park-and-Ride Facility - The State is planning to construct a civic center near the Iwilei park-and-ride facility. Additionally, some businesses operate within walking distance of the facility.

A discussion should be provided on the plan to enforce the proper use of the Iwilei park-and-ride facility. The discussion should describe the plan for preventing an employee at the Iwilei civic center or nearby business from parking the employee's auto at the facility and walking to work.

Response: Parking at the park-and-rides will not be free. There will be a graduated pricing structure such that parking closer in is more expensive than at outlying areas. The

cost of parking at the Hialeah Transit Center will be one form of disincentive to keep close by workers from using the garage. Additionally, parkers will have to get their parking tickets validated by the bus driver as proof of having used the transit system.

d. Justification for Apparent Saratoga Park-and-Ride Facility - The response to question (27)(B) on page 19 of Communication D-840 (2000) states in part: "The travel demand analysis assumes the potential use of the Hale Koa garage and/or future garage at Ft. DeRussy as a park-and-ride (sic) so that new parking could be reduced at new hotel sites."

It does not seem logical that a person in Waikiki would drive to the Saratoga station to access the In-Town BRT system, especially since the loop on Kalakaua Avenue and Kuhio Avenue makes the system easily accessible from almost everywhere in Waikiki. A better justification for the Saratoga park-and-ride facility and number of "drive" arrivals should be provided.

If the assumption is that the In-Town BRT system will be ridden by hotel guests who park their rented autos at the park-and-ride facility, then elaboration should be provided. The question is: why would they choose transit rather than the rented autos for their trips?

If the assumption is that visitor industry employees residing outside Waikiki will drive their autos to the park-and-ride facility and ride the In-Town BRT system to work, then justification for such use of the facility should be provided. Under that assumption, the facility would seem to serve as an auto trip generator rather than an auto trip reducer.

Response: The Saratoga Park-and-Ride facility is not a City project nor part of the Refined LPA. If the Army elects to proceed with the Saratoga Park-and-Ride it will be their project.

31. The Transportation For Oahu Plan: TOP 2025<sup>11</sup>, adopted by the OMPO Policy Committee includes a Fort Armstrong Tunnel project that will enable autos to travel through Sand Island to the Kakaako makai area.

The Travel Forecasting Results Report includes ridership data for a BRT Alternative with the "Sand Island Scenic Parkway." A component of the "Parkway" is a Fort Armstrong Tunnel to the Kakaako makai area. The data indicate that the BRT with Sand Island Scenic Parkway Alternative will have 22,800 daily transit trips less than the original BRT Alternative without the Parkway. See table 4-2 on page 4-2 of the Travel Forecasting Results Report.

<sup>11</sup> Carter Burgess, prepared for the Oahu Metropolitan Planning Organization and its participating agencies, Transportation For Oahu Plan: TOP 2025 (Honolulu: 2001), table 4-1, page 4-5.

Response: Sand Island Scenic Parkway is no longer part of the PCPTP. The Fort Armstrong Tunnel and other TOP 2025 Projects are reflected in the ridership and traffic impact analyses for all of the Alternatives.

32. Although the surface portion of the Sand Island Scenic Parkway is not included in TOP 2025, the data in the Travel Forecasting Results Report lead to a reasonable conclusion that a Fort Armstrong Tunnel will likely reduce transit ridership.

a. Since the Fort Armstrong Tunnel remains in TOP 2025, a discussion should be provided on whether the ridership forecast for the Refined BRT Alternative assumes the existence of the Tunnel in 2025. If the forecast does not assume the existence of the Tunnel, the reason for excluding the Tunnel from the assumption should be provided.

Response: See response to comment #31.

b. A discussion also should be provided on how the Kakaako exit of the Fort Armstrong Tunnel will interface with the "Kakaako Maker" alignment of the In-Town BRT system.

Response: Resolution of design interface issues associated with the Fort Armstrong tunnel will occur once the tunnel advances to the next phase of design.

Leakage Of Federal New Start Funds

33. Pages 5-18 and 5-19 discuss the construction economic impacts of the federal new start funds for the Refined BRT Alternative. The impact is based on the expenditure of \$147 million in 1998 dollars of federal new start funds.

The discussion should state whether the \$147 million was adjusted to eliminate the portion of federal new start funds that, at least in theory, should be allocated to the following:

- (A) Materials, supplies, equipment, and services imported into the State or provided out-of-state;
- (B) Profit retained by out-of-state contractors; and
- (C) Taxes.

If the construction impact analysis was performed without the adjustments, the discussion and tables should reflect the expenditure of approximately adjusted federal new start funds.

Response: An adjustment to eliminate out of state costs is already reflected in the construction economic impact calculations.

Consideration Of Federal New Start Funds Actually Expended For Construction

34. According to the fifth paragraph on page 6-10, some City general obligation bonds will have to be expended for construction as an advance for federal new start funds. When the federal new start funds are reimbursed to the City, the funds apparently will not be used for more construction. Instead, the funds apparently will be used in subsequent years for "bus replacement."

The amount of federal new start funds reimbursed to the City for the advanced City general obligation bonds should not be inputted for the construction economic impact analysis. As indicated previously, those funds apparently will be used for bus replacement, not construction, and, according to the second full paragraph on page 5-17: "Buses ... are assumed to be procured from outside the State."

The amount of local general obligation bonds advanced for construction also should not be factored in the economic impact analysis. "This is because local funds invested in the project ... would likely be spent in some other manner within the local economy - with similar multiplied impacts - in the absence of investment in the primary transportation corridor." See the last paragraph on page 5-18.

**Response:** The New Starts funds are still considered by FTA to be funding the eligible parts of the project for which the City advanced funds, even though for cash flow purposes they are shown in the timeline as funding bus replacements. Essentially, when the FTA New Starts funds are received in subsequent years they are treating up local funds to be used for funding bus replacements in those years.

**Business Displacements And Property Acquisitions**

35. Table 5.2-1 on page 5-21 indicates that the Refined BRT Alternative may result in up to 17 total business displacements and up to 47 partial business displacements.

- (A) The businesses that may be displaced and their addresses should be identified.
- (B) Other necessary property acquisitions that do not require business displacements should also be identified.

**Response:** The FEIS Section 5.2 discloses all the businesses, institutions and residences affected by right-of-way requirements. The adjacent street will be named, but not the full address. The impact analysis of the FEIS discusses whether the affected business or institution would be fully displaced (i.e., need to be relocated) or partially affected, such as losing parking or landscaping.

Most property acquisitions (full or partial) affect an existing land use (business, institution, etc.). Therefore, the FEIS displacements section discloses all parcels affected by additional right-of-way.

**Noise Impact Of Aloha Stadium Transit Center/Park-And-Ride**

36. Section 5.6, commencing on page 5-32, discusses noise impacts.

The Section, however, does not address the noise impact of the Aloha Stadium transit center/park-and-ride facility on the nearby Halawa Valley and Makalapa residential communities. More bus and auto activity logically will occur at the transit facility because the Luapele Drive ramp replaces two others and the number of park-and-ride stalls increases to 1,000 from 500.

**Response:** The operations of the Aloha Stadium Transit Center and its potential noise impact on the nearby Puuwaia Momi and Halawa Valley residential communities have been assessed and will be included in Section 5.6 of the FEIS. The noise sources associated with the transit center that were considered in the assessment are: (1) on-site BRT vehicles idling within the Transit Center; and (2) the off-site movement of BRT vehicles and autos traveling to the Transit Center. The projected transit center noise levels considered both the diesel and hybrid diesel/electric vehicles. An analysis was conducted at the nearest noise sensitive receptors at the Puuwaia Momi Apartments and the single-family residences in Halawa Valley Estates. There would be moderate noise impacts at the Puuwaia Momi Apartments, Buildings 1, 3, 4, and 5 with either the diesel or the hybrid diesel/electric vehicle. Property line noise barriers would be effective in mitigating the noise impacts from the Aloha Stadium Transit Center to the Puuwaia Momi Apartments. The noise barrier would be located at the rear of Buildings 1, 3, 4 and 53 and could incorporate doors to allow continued access from Salt Lake Boulevard to the rear of those buildings. There will be no impacts to the Makalapa Manor residential community and the single family homes in Halawa Valley Estates. In addition, there will be moderate impacts from both the diesel and hybrid technologies at the homes on Luaoia Place by the proposed Luapele Drive ramp. Noise barriers

would not be feasible in mitigating the noise impacts at the single-family residences on Luaoia Place, because the barrier would interfere with traffic and pedestrian movements. Interior sound insulation of the affected homes could be a reasonable alternative to a noise barrier.

**Direct Energy Impact From Vehicle Hours Of Delay**

37. Section 5.9.1 commencing on page 5-39 discusses the "direct energy (operational) impact. The fifth paragraph on page 5-39 states:

In assessing the direct energy impact, the following factors were used:

- Annual vehicle miles traveled (VMT) for automobiles, trucks, buses, and in-town town (sic) BRT vehicles.
- Fuel consumption rates by vehicle type.

The statement is silent concerning "vehicle hours of delay."

The discussion should clarify whether the amount of "vehicle hours of delay" was used to determine the direct energy impact of each Alternative. If not, the discussion should explain the reason for the omission.

**Response:** This methodology is based on the requirements of the Clean Air Act Amendments of 1990 and the subsequent EPA Transportation Conformity Rule Amendments: Flexibility and Streamlining: Final Rule. Section 93.122 of the Final Rule specifically details the procedures for determining regional transportation-related emissions and refers to the estimation of VMT as part of these procedures. Federal law requires the use of VMT in the calculation of vehicle emissions and the similar methodologies apply to the calculation of related transportation energies.

**Number Of Passenger Vehicles And Transit Buses For Indirect Energy Impact**

38. The second full paragraph on page 5-40 states: "indirect energy also involves the manufacturing and maintenance of vehicles. This includes both passenger vehicles and transit buses."

A discussion should be provided on how the numbers of "passenger vehicles" and "transit buses" under each Alternative were determined. The discussion also should identify the numbers for each Alternative.

If the number of "passenger vehicles" represents or includes the autos that theoretically will not be purchased by new transit riders making home-based work trips, then justification should be provided. A person changing to the transit mode for a home-based work trip likely will continue to own an auto for non-work trips.

**Response:** This information was derived from the travel demand forecasting procedures maintained by the OMPD, the regional planning organization for Oahu.

Numbers of passenger vehicles and transit buses are not used instead, total vehicle miles traveled (VMT) for both modes are used. This VMT format is used because it is what is needed for the energy conversions.



"Indirect Energy Consumption" For "Maintenance"

39. The first full paragraph on page 5-43 states: "Construction of the Refined BRT Alternative would result in the greatest indirect consumption of energy in comparison to the other alternatives." For construction, the indirect energy consumption appears to be a one-time value.

With respect to the indirect energy consumption for maintenance, the first full paragraph on page 5-43 also states that "overall energy consumption for maintenance [under the Refined BRT Alternative] would be approximately one thousand barrels of oil more due to the increased use [sic] number of transit vehicles in service." Table 5.9-3 on page 5-42 indicates that the indirect energy consumption for "maintenance" is calculated based only on the maintenance of "passenger vehicles" and "transit buses."

a. The table and a discussion should indicate whether the indirect energy consumption for "maintenance" is an annual or one-time value.

Response: Comment noted. First paragraph of the FEIS, Section 5.9.2, Energy Impacts, 2) Indirect Energy (Construction) has been revised to clarify that indirect energy consumption (including construction and maintenance during construction activities) estimates represent one-time, non-recoverable energy costs.

b. The table also should include indirect energy consumption values for the maintenance of "roadways," "parking," "structures," and "maintenance facility." Indirect energy consumption values are provided in the table only for construction of those facilities.

Response: The FEIS energy analysis (Section 5.9) was done in conformance with accepted procedures. (See response to comment #37, above.) The only items included in this calculation are construction-related costs. The maintenance of these facilities are not considered to be construction-related activities. Maintenance is only relevant for vehicles because these vehicles need to be maintained during the construction period.

Elimination Of Ala Moana Boulevard Street Parking On Ala Moana Park

40. The fourth full paragraph on page 5-47 discusses the federal "Section 4(f)" limitations on the use of parklands for transportation projects. The paragraph states:

The word "use" in this case means:

...

• the project's proximity to the site substantially impairs those functions that qualify the site as a Section 4(f) resource even though no land is permanently or temporarily acquired. This is called "constructive use."

A discussion should be provided on whether the elimination of the on-street parking for Ala Moana Park caused by the In-Town BRT alignment represents a "constructive use" under Section 4(f).

Response: For the loss of the evening/weekend/holiday parking on Ala Moana Boulevard to be considered a Section 4(f) constructive use, Ala Moana Park's value in terms of public enjoyment would have to be substantially reduced by the project. Although the loss of parking on Ala Moana Boulevard is an impact, it does not rise to the level of constructive use. Park users will still be able to access the park by private vehicle or by transit. The FEIS, Section 5.11.2 on Section 4(f) has been revised to include this issue.

41. Table 6.103C on page 6-8 displays the "conceptual capital funding plan" for the Refined BRT Alternative for the fiscal years 2002 - 2010. In contrast, table 6.1C-3 on page 6-8 of the DEIS displays the conceptual funding plan for the original BRT Alternative for the fiscal years 2001 - 2010.

a. For a better understanding of the total cost of the integrated transit system, the "conceptual capital funding plan" for the Refined BRT Alternative should encompass the fiscal period 2001-10. Some of the buses or other improvements paid with expenditures during the fiscal year 2001 will be used under the Refined BRT Alternative.

Response: The first year of the funding plan in the SDEIS is reflected as FY 2002 to keep the cash flow of the financial analysis as current as possible. In the FEIS, the first year of the funding plan is updated to FY 2003. Capital expenditures from previous years for the entire system are accounted for in the annual debt payment for bonds issued prior to the first year of the funding plan.

b. The "conceptual" capital funding plan" for the Refined BRT Alternative shows a bus acquisition cost of \$16,649,000 less than the bus acquisition cost for the original BRT Alternative in the DEIS. The reason for the difference should be explained.

Response: The bus replacement plans have been refined for all of the alternatives resulting in a different mix of buses being required in the fleet. This is reflected in the updated capital costs.

42. Table 6.1 on page 6-3 sets forth the capital costs of the Alternatives.

At least in a footnote, the table should include the amount of interest payable on general obligation bonds issued to fund each Alternative.

Circulation based on the data in table E-3 on page E-11 indicates that interest payable for the Refined BRT Alternative during the 2002 to 2025 period will amount to \$195,442,000 for general obligation bond proceeds of \$331,000,000.<sup>12</sup>

<sup>12</sup> The calculation is as follows: \$526,442,000 in "debt service on bonds issued after 2002" - \$331,000,000 in "G.O. bond proceeds." The calculation does not include debt service payments after 2025 for bonds issued before 2025.

Response: The average annual debt service payment for post 2002 debt (by alternative) is shown on Table 6.1-11.

43. The SDEIS does not mention whether land acquisition costs for transit centers and park-and-ride facilities are included in the capital cost of the Refined BRT Alternative. In contrast, the first paragraph on page 2-34 of the DEIS indicates that land acquisition costs for some facilities were not included in the capital costs of the Alternatives.

a. A discussion should be provided on whether the capital cost of the Refined BRT Alternative includes all costs for land acquisition, when necessary, for transit centers and park-and-ride facilities.

# CORRECTION

THE PRECEDING DOCUMENT(S) HAS  
BEEN REPHOTOGRAPHED TO ASSURE  
LEGIBILITY  
SEE FRAME(S)  
IMMEDIATELY FOLLOWING

Indirect Energy Consumption For Maintenance

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With respect to the indirect energy consumption for maintenance, the first full paragraph on page 5-43 also states that "overall energy consumption for maintenance (under the Refined BRT Alternative) would be approximately one thousand barrels of oil more due to the increased use [sic] number of transit vehicles in service." Table 5.9-3 on page 5-42 indicates that the indirect energy consumption for "maintenance" is calculated based only on the maintenance of "passenger vehicles" and "transit buses."

a. The table and a discussion should indicate whether the indirect energy consumption for "maintenance" is an annual or one-time value.

Response: Comment noted. First paragraph of the FEIS, Section 5.9.2, Energy Impacts, 2) Indirect Energy (Construction) has been revised to clarify that indirect energy consumption (including construction and maintenance during construction activities) estimates represent one-time, non-recoverable energy costs.

b. The table also should include indirect energy consumption values for the maintenance of "roadways," "parking," "structures," and "maintenance facility." Indirect energy consumption values are provided in the table only for construction of those facilities.

Response: The FEIS energy analysis (Section 5.9) was done in conformance with accepted procedures. (See response to comment #37, above.) The only items included in this calculation are construction-related costs. The maintenance of these facilities are not considered to be construction-related activities. Maintenance is only relevant for vehicles because these vehicles need to be maintained during the construction period.

Elimination Of Ala Moana Boulevard Street Parking On Ala Moana Park  
40. The fourth full paragraph on page 5-47 discusses the federal "Section 4(f)" limitations on the use of parklands for transportation projects. The paragraph states:

The word "use" in this case means:

...

the project's proximity to the site substantially impairs those functions that qualify the site as a Section 4(f) resource even though no land is permanently or temporarily acquired. This is called "constructive use."

A discussion should be provided on whether the elimination of the on-street parking for Ala Moana Park caused by the In-Town BRT alignment represents a "constructive use" under Section 4(f).

Response: For the loss of the evening/weekend/holiday parking on Ala Moana Boulevard to be considered a Section 4(f) constructive use, Ala Moana Park's value in terms of public enjoyment would have to be substantially reduced by the project. Although the loss of parking on Ala Moana Boulevard is an impact, it does not rise to the level of constructive use. Park users will still be able to access the park by private vehicle or by transit. The FEIS, Section 5.11.2 on Section 4(f) has been revised to include this issue.

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a. For a better understanding of the total cost of the integrated transit system, the "conceptual capital funding plan" for the Refined BRT Alternative should encompass the fiscal period 2001-10. Some of the buses or other improvements paid with expenditures during the fiscal year 2001 will be used under the Refined BRT Alternative.

Response: The first year of the funding plan in the SDEIS is reflected as FY 2002 to keep the cash flow of the financial analysis as current as possible. In the FEIS, the first year of the funding plan is updated to FY 2003. Capital expenditures from previous years for the entire system are accounted for in the annual debt payment for bonds issued prior to the first year of the funding plan.

b. The "conceptual" capital funding plan for the Refined BRT Alternative shows a bus acquisition cost of \$16,649,000 less than the bus acquisition cost for the original BRT Alternative in the DEIS. The reason for the difference should be explained.

Response: The bus replacement plans have been refined for all of the alternatives resulting in a different mix of buses being required in the fleet. This is reflected in the updated capital costs.

42. Table 6.1 on page 6-3 sets forth the capital costs of the Alternatives.

At least in a footnote, the table should include the amount of interest payable on general obligation bonds issued to fund each Alternative.

Circulation based on the data in table E-3 on page E-11 indicates that interest payable for the Refined BRT Alternative during the 2002 to 2025 period will amount to \$195,442,000 for general obligation bond proceeds of \$337,000,000.<sup>12</sup>

<sup>12</sup> The calculation is as follows: \$526,442,000 in "debt service on bonds issued after 2002" - \$331,000,000 in "G.O. bond proceeds." The calculation does not include debt service payments after 2025 for bonds issued before 2025.

Response: The average annual debt service payment for post 2002 debt (by alternative) is shown on Table 6.1-11.

43. The SDEIS does not mention whether land acquisition costs for transit centers and park-and-ride facilities are included in the capital cost of the Refined BRT Alternative. In contrast, the first paragraph on page 2-34 of the DEIS indicates that land acquisition costs for some facilities were not included in the capital costs of the Alternatives.

a. A discussion should be provided on whether the capital cost of the Refined BRT Alternative includes all costs for land acquisition, when necessary, for transit centers and park-and-ride facilities.

**Response:** Land costs are included for right-of-way acquisition in the FEIS. Land costs for transit centers and park-and-rides when they are proposed to be developed as separate projects from the PCTP are not included in the capital cost estimates.

No land acquisition costs are included for the Aloha Stadium and Twitell Transit Centers since they will be constructed on public lands. Land for the Kapolei Transit Center and North-South Road Park-and-Ride are assumed to be donated to the City as a condition of development rights by private land developers. Land acquisition costs for the Middle Street Transit Center will be borne by an independent project for a park-and-ride at this site.

**b. The discussion should identify the transit centers and park-and-ride facilities, the acquisition of land for which may be required, and the estimated cost of acquisition.**

**Response:** See response to comment #43A.

**44. Table 6.1-1 on page 6-3 displays the capital costs of the Alternatives.**

**a. The capital cost of the Refined BRT Alternative should include the cost to the City, if any, of the apparent Waikiki park-and-ride facility.**

**Response:** The possible park-and-ride in Waikiki at Fort DeRussy is not part of the PCTP. The U.S. Army would be responsible for a Fort DeRussy park-and-ride if it were to be built.

**b. The capital cost of the Refined BRT Alternative also should include the costs of the Pearl City and Aiea park-and-ride facilities recommended by the Pearl City/Aiea Working Group. According to generic estimates, one four-bus bay, 100-surface parking stall facility has a capital cost of \$1,650,000 in 1998 dollars, excluding land acquisition cost. See page 5 of the "Regional BRT Transit Centers Capital Cost Estimates" and page 5 of the "Regional BRT Transit Parking Capital Cost Estimates" in the Estimated Capital Costs Technical Report.**

**Response:** Many of the transit centers that will be part of the hub-and-spoke system will be funded separately from the PCTP. The transit centers in Pearl City and Aiea are among those that are proposed to be funded as separate projects.

**c. If the Kamehameha Highway bus contra-flow operation recommended by the Pearl City/Aiea Working Group is expected to incur capital cost, that cost should be included in the capital cost of the Refined BRT Alternative.**

**Response:** The traffic and environmental impacts of a contra-flow operation on Kamehameha Highway need to be analyzed in greater detail than was possible during the Working Group phase of the PCTP. The City is proceeding with this as an independent project from the PCTP. This is project number 2003043 in the FY 2003 CIP.

**45. An ambitious bus purchase schedule for the 2000 to 2025 period is set forth for the original BRT Alternative. The following table displays the number of buses that must be purchased under the schedule.**

**BUS PURCHASE SCHEDULE BETWEEN 2000 AND 2025  
FOR ORIGINAL BRT ALTERNATIVE**

Minibuses	Standard Buses	Articulated Buses	TOTAL
170	893	174	1,237

**Source:** Page 3 of the "Bus Replacement Capital Cost Estimates" of the Estimated Capital Costs Technical Report

Much of the benefits of the Refined BRT Alternative will result from the bus service.<sup>14</sup> Most of the transit trips under the Alternative will be taken only on buses. Consequently, adherence to the bus supply will be necessary to achieve most of the forecasted ridership and benefits of the Refined BRT Alternative.

Bus purchases and service, however, will be susceptible to cutbacks if the City experiences future financial problems.

A discussion should be provided on the plan to adhere to the bus purchase schedule and bus service supply identified for the Refined BRT Alternative. The discussion should indicate what type of legislative or intergovernmental commitment is necessary now to guarantee adherence to the schedule in the future. The discussion also should indicate what penalty, if any, may be imposed by the Federal Transit Administration on the City due to noncompliance with the bus purchase schedule.

<sup>14</sup> Logic indicates that the bus purchase schedule for the Refined BRT Alternative will be the same or similar to that for the original BRT Alternative since both will have a fleet of 730 buses in 2025. Consequently, any conclusion derived from the schedule for the original BRT Alternative would seem applicable to the Refined BRT Alternative.

**Response:** The actual, year-by-year schedule of new bus purchases is a function of service expansion and existing fleet replacement needs. Timing of existing fleet replacement is typically determined by expected vehicle life (12 years is standard for a full-size bus, although OTS maintains their fleet carefully and operates vehicles longer), available funds, and delivery times/procurement strategies. Service expansion usually occurs in conjunction with a new operating plan and/or capital improvements like the BRT lanes. Since traditionally, legislative bodies cannot effectively bind their successors, it may not be possible to secure the type of commitment the comment suggests. Even a multi-year federal transportation initiative such as embodied in the TEA-21 legislation is still subject to annual appropriations. In that sense, there are no guarantees from one year to the next.

The "penalty" imposed by the FTA is that grants awarded to the City, for which the City cannot provide the local match or in some other way cannot meet the grant terms, are simply revoked – the project sponsor loses the federal share of the project's funding if it cannot provide the non-federal share, so the project does not go forward.

Philosophically, the same question asked about providing annual funding for replacement and expansion of capital could be asked about construction of new school buildings or other public infrastructure - where will the original funding come from, and where will the money to replace aging components come from? The answer reflects public priorities at the time when the money is needed.

46. Table 6.1-3C on page 6-8 of the SDEIS indicates that, under the capital funding plan for the Refined BRT Alternative, federal new start funds amounting to \$229,751,000 will be required. In contrast, table 6.1-3C on page 6-8 of the DEIS indicates that the original BRT Alternative would have required \$182,100,000 in federal New Start funds.

A discussion should be provided on the competitive process for obtaining federal new start funds from the Federal Transit Administration. The discussion also should summarize the contingency funding source if the City does not receive the full amount.

Response: The following factors were considered in increasing the target level of FTA New Starts funding between the DEIS and the SDEIS and FEIS: a) The Refined LPA includes an additional In-Town BRT branch (from Hialeah to Waikiki) that had not been in the DEIS, thus increasing the capital cost of the project; b) In the DEIS, no FTA New Starts funding was being requested for the Regional BRT component of the program. In the SDEIS and FEIS, the level of FTA New Starts funding being requested was increased \$20 million in partial replacement for funding that had been proposed to come from State sources in the DEIS.

It should be noted that even with the increased level of FTA New Starts funding being requested in the FEIS, the total level of FTA New Start participation is still low in comparison to other projects nationwide - in terms of dollar amount and percentage participation. The level of federal participation proposed is considered conservative, with a high probability of being funded.

The purpose of the financial plan in the FEIS is to show the FTA the sources and uses of funds and to document the level of New Starts funding the City will be requesting. It is not required to show alternative funding plans in the FEIS.

47. The third paragraph on page 6-1 states: "The financial analysis concludes that the Refined BRT Alternative along with the system-wide bus and The Hand-Van replacement and expansion program can be funded without adding new taxes or raising taxes using the following revenues sources: ..."

a. A discussion should address whether City funds will have to be diverted from existing non-transit programs and projects to the Refined BRT Alternative as a consequence of the capital and operating and maintenance funding plans in the SDEIS. If no diversion is required, justification should be provided, given the increased debt service and operating and maintenance cost for the Alternative.

b. The discussion also should address whether taxes will have to be added or raised to replace the City funds diverted from non-transit programs and projects to the Refined BRT Alternative. If taxes will not have to be added or raised, justification should be provided.

Response: An assumption used to model the financial analysis was the necessity to accommodate non-transit programs and projects. Therefore, the project and the local funding requirement have been phased to moderate the amount required in any given year. Choices will

need to be made on a year by year basis on future (not existing) programs and projects to accommodate capital funding limits - the same as they may need to be made for any other major capital project. The cash flow analysis provides the quantitative information for the policy decision. In the FEIS, the amount of GO Bond proceeds in any given year was moderated by spreading the use of the revenue over several years, to allow for additional capacity for other projects.

48. The conceptual capital funding plan for the Refined BRT Alternative proposes the use of the major portion of the annual federal Section 5307 grant to the City for capital costs. The last paragraph on page 6-6 states: "Over the 2005-2021 period, a minimum of 30 percent of the City's Section 5307 funds are assumed to be used for preventive maintenance, [sic] with a maximum of 70 percent used for other capital and planning needs." The second full paragraph on page 6-12 states: "The assumption made in the financial analyses is that a minimum of \$12.00 million in FTA Section 5307 funds would be reserved for preventive maintenance in FY 2002, and a minimum of \$6.00 million annually in FYs 2003-05."

The following table displays the amounts expended or encumbered for "preventive maintenance" from the federal grants fund in the recent past. Expenditures from that fund are made for City operating programs.

FEDERAL GRANTS FUND  
EXPENDITURES AND ENCUMBRANCES FOR  
"PREVENTIVE MAINTENANCE"  
(in Thousands of Dollars)

Preventive Maintenance / Encumbrances As Of June 30 Of Fiscal Year	FY 98-99	FY 99-00	FY 00-01
	\$ 5,798.6	\$18,276.6	\$20,000.0

Sources: Pages on the federal grants fund for "transportation services" in the "Budget and Fiscal Services Director's Financial Report" for the pertinent fiscal years. The "Reports" do not identify the "preventive maintenance" funds as coming from the Section 5307 grants. A conclusion that the funds are from the Section 5307 grants, however, seems reasonable.

a. The amounts of federal funds expended on or encumbered for preventive maintenance, an operating program, were more than \$6 million in the fiscal year 1999 - 2000 and fiscal year 2000-01. The operating and maintenance cash flow analysis in table E-3 indicates that City general funds apparently will have to replace the federal preventive maintenance funds diverted to the capital cost of the Refined BRT Alternative. A discussion of whether this assessment is correct should be provided.

Response: Prior to 1998, there were no significant amounts from the federal formula funds used for preventive maintenance. The cash flow analysis provides year-by-year information. Over the 2002-2025 period, 100 percent of the FTA Section 5307 funds available for capital costs will be used for on-going, system-wide bus acquisition and replacement.

If there are insufficient general funds to pay for O&M costs in any given year, policymakers would have the choice of: (1) deferring capital expenditures and using a larger share of FTA Section 5307 funds for preventive maintenance; (2) using bond funds for transit capital and a larger share of Section 5307 funds for preventive maintenance; (3) temporarily reducing service; (4) delaying preventive maintenance; or (5) financing non-transit programs from which money would be diverted to pay for the preventive maintenance through General Obligation bonds.

b. If the assessment under paragraph (A) above is correct, the last sentence on page 6-6 should be eliminated or appropriately revised. It states: "The Section 5307 assistance for preventive maintenance reduces the annual General Fund subsidy for transit operating and maintenance (O&M) costs." When compared to the expenditures in fiscal year 1999-00 and fiscal year 2000-01, the planned diversion of the federal funds in subsequent years to capital cost may require an increase of the City general fund subsidy for transit operating and maintenance.

Response: The reason Section 5307 funds have been used for preventive maintenance is to reduce the annual General Fund subsidy for transit operating and maintenance costs. See response to Comment #48A.

c. A discussion should be provided on whether the diversion of federal funds from preventive maintenance to capital cost will result in less bus maintenance in the future.

Response: It is possible that there could be a need for lower maintenance costs - which is not the same as less bus maintenance. As noted in response to comment #48A, this is not the only option for policymakers. Therefore, it would be inappropriate to speculate on that possibility.

49. The fourth and fifth paragraphs on page 6-9 discuss the availability of Federal Highway Administration funds for the capital cost of the Refined BRT Alternative. The following statement is in the fourth paragraph: "Currently, a total of \$116 to \$120 million in FHWA funds are received each year by the State." The fifth paragraph states: "For the Refined BRT Alternative, a total of \$160 million in FHWA funding has been assumed in the financial analysis, and the amount capped at \$20 million annually over the FYs 2002-2010."

The amounts of FHWA funds annually expended by the City for capital improvements in the recent past should be identified. A discussion also should be provided on the probability of the City receiving \$20 million annually in FHWA funds.

Response: The amount and timing of FHWA funds are decisions made by OMPO. In cooperative planning by the State, federal and local agencies. The amount of FHWA funds received by the City has fluctuated, depending on the priority, total cost, and phasing of the project(s). Over 50 percent of FHWA funds are spent on Oahu. OMPO and the State DOT have been kept closely apprised of the project's funding needs.

50. In a letter, dated September 18, 2001, to the City Director of Transportation Services, the State Director of Transportation comments on State participation in funding the BRT project. The letter reads in part:

We have from the onset expressed our reservations on being able to fund this project, as the statewide needs far exceed our limited resources. More recently, in meetings on the project, we were advised that alternative funding strategies were in place, where Federal Highways (FHWA) and State funds would not be required.

As such, it is not our intent or expectation to provide funding for the BRT project, and have developed our capital improvement programs accordingly. (Underscoring added.)

A response to the State Director of Transportation's position regarding the FHWA funds should be provided. If FHWA funds are unavailable, the contingency funding source should be identified.

Response: The SDEIS and FEIS reflect the removal of State highway funds as a capital funding source, in response to the request of State officials and as agreed to at the OMPO Policy Committee. On May 7, 2002, the State Department of Transportation provided a clarification to the September 18, 2001 comment on FHWA funding. In that letter, SDOT indicated that OMPO will approve the amount of Oahu FHWA funds available for BRT and other projects. Since 2000, OMPO has been aware of the \$160 million in FHWA funding proposed for the project.

51. The third full paragraph on page 6-10 discusses the use of City highway funds for debt service. The paragraph includes the statement: "Over this same period fiscal years 2002 - 2010, the average annual contribution for debt service would be \$34.74 million, of which approximately 45 percent would be for debt incurred by the City prior to 2002." The following compares the actual, estimated, and proposed transfers in recent years of City highway funds to pay debt service. As displayed, the amounts are much less than \$34.74 million.

TRANSFERS FROM CITY HIGHWAY FUND  
TO PAY DEBT SERVICE

FY 2002-10 Average Annual Contribution Under SDEIS	FY 2000-01 Actual Transfer	FY 2001-02 Estimated Transfer	FY 2002-03 Proposed Transfer
\$34,740,000	\$14,949,000	\$13,943,829	\$16,872,798

Sources: For the FY 2000-01 actual transfer, page 112 of the Comprehensive Annual Financial Report For The Fiscal Year Ended June 30, 2001. For the FY 2001-02 estimated transfer and FY 2002-03 proposed transfer, page C-8 of the The Executive Program And Budget, Fiscal Year 2003, Volume I: Operating Program and Budget.

a. A discussion should be provided on what effect the diversion of the additional City highway funds for the Refined BRT Alternative's debt service will have on other programs and projects now funded by City highway funds.

Of particular interest is whether the annual \$18 to \$20 million in additional City highway funds for the debt service payment will be diverted from the City highway fund transfers to the bus transportation fund. For fiscal year 2002-03, the proposed "bus subsidy" from the City highway fund is \$33,990,661, according to page C-16 of The Executive Program And Budget, Fiscal Year 2003, Volume I: Operating Program And Budget.

Response: The FEIS assumes that the City Highway Fund will not be used as a source for the 20 percent local match required for federal funds. The change in assumption will also change the balance of debt service payment from the City Highway Fund and other

sources. The FEIS specifies the level of City funding required for debt service for public transportation purposes, and the percentage required of total debt service to be paid from the City Highway Fund.

b. A discussion also should be provided on the City Administration's intention regarding the source of debt service for future City highway projects.

Response: The financial analysis assumes that any bonding and subsequent debt service for the BRT, transit and highway projects will need to fall under the debt policies established by the City Council. As such, the project is not intended to add to the overall debt of the City; rather, to be a part of the total capital commitment projected by the City. An analysis was performed on the cash flow to assure compliance with the City's debt performance ratios.

52. The third full paragraph on page 6-10 states: "Over the longer FYs 2002-2025 period, the average annual contribution from the City Highway Fund to provide local match to federal grants is projected to be \$5.53 million."

According to the response to question (45)(A) on page 35 of Communication D-840 (2000), the City has not made any cash expenditure from the City highway fund for a mass transit capital project in the recent past.

A discussion should be provided on whether a cash expenditure from the City highway funds for a capital improvement project will be affordable, given the other City highway fund obligations, both proposed in the SDEIS and existing under current budgetary practices.

Response: The FEIS assumes that no City Highway Funds will be used as the capital match for federal grants.

53. A discrepancy exists in the description of the funding source of the debt service for the Refined BRT Alternative. Table E-3 indicates that the debt service will be paid from the City Highway Fund. Additionally, in a discussion of the City Highway Fund, the second full paragraph on page 6-10 states: "It is assumed that the Fund pays for debt service on transit-related bonds issued after 2002." In discussing the City general fund, however, the fourth full paragraph on the same page states: "The debt service on General Obligation Bonds would be paid from the City General Fund."

Clarification should be provided on whether the debt service for the Refined BRT Alternative will be payable from the City Highway Fund or City general fund. A transfer of City highway funds to the City general fund for subsequent payment of the debt service should be regarded as a payment from the City Highway Fund.

Response: The FEIS provides an analysis of the amount of debt service to be paid for from the City Highway Fund, and the amount that would need to be paid for from the general fund.

54. The third paragraph on page 6-11 states: "The issuance of General Obligation Bonds is constrained in the financial analyses to a total equivalent to the 1996 level of \$1.13 billion outstanding in any given year. This amount is adjusted annually to reflect a conservative 1.5 percent rate of inflation and to allow for repayment of principal and interest on outstanding bonds."

a. The City Administration uses outstanding general obligation bonds as the factor for determining the capacity for additional general obligation bonds. The City Administration does not factor in its analysis outstanding reimbursable and revenue bonds payable from dedicated revenues instead of general revenues. Debt service on certain of those outstanding bonds, such as sewer bonds, is also payable by residents and businesses through special charges additional to real property taxes. Thus, the debt burden from reimbursable and revenue bonds should be considered in addition to the debt burden from general obligation bonds. Housing or other types of bonds, the debt service of which is payable exclusively by limited beneficiaries, should be excluded.

Response: This assumption was used as a constraint on the total debt of the City so that this project would be a part of the total projected capital program, and not an addition to the capital program. Subsequently, the City has adopted into practice policies for determining the capacity for additional general obligation bonds. The FEIS included an analysis to ensure compliance with the City's Debt and Financial Policies as passed by the City Council in April 2002.

b. The following is a portion of a table from The Comprehensive Annual Financial Report For The Fiscal Year Ended June 30, 2001, with verbatim footnotes. It indicates that the \$1,132,844,000 in direct bonded debt in fiscal year 1995-96 included bonds for sewer and refuse collection purposes. Only from the fiscal year 1999-2000 does the direct bonded debt exclude bonds for sewer and refuse collection purposes. Consequently, the \$987,147,000 in direct bonded debt in that year should be the appropriate base for the City Administration, under its methodology, to measure the direct bonded debt ceiling in subsequent years for transit and other non-self-supporting projects.

DIRECT BONDED DEBT

FROM FISCAL YEAR 1991-92 TO FISCAL YEAR 2000-01

(The footnote designations and narratives are repeated verbatim from the source to avoid misinterpretation of the information)

Fiscal Year	Direct Bonded Debt (c) (in Thousand \$)
1991-92	635,872
1992-93	912,650
1993-94	1,122,894
1994-95	1,078,373
1995-96	1,132,844 (d)
1996-97	856,596 (e)
1997-98	870,856 (e)
1998-99	978,576 (e)
1999-00	987,147 (e)
2000-01	1,103,082 (e)

(c) Excludes non-tax supported debt.  
(d) Effective fiscal year 1997, excludes bonds issued for sewer purposes by Ordinance No. 97-46. Effective fiscal year 2000, excludes bonds issued for refuse collection by Ordinance No. 99-22.

Source: Table 8 on page 216 of The Comprehensive Annual Financial Report For The Fiscal Year Ended June 30, 2001.

A discussion should be provided of the following:

1) Why the City Administration uses the \$1,132,844,000 figure for fiscal year 1995-96, the highest in recent years, for its calculation of the direct bonded debt ceiling instead of the more appropriate \$987,147,000 in fiscal year 1999-00?

Response: This comment is regarding the City's financial report and its contents, not the Refined LPA EIS. As the agency responsible for the City's financial report, the Department of Budget and Fiscal Services should be contacted regarding this comment.

2) Whether, according to the City Administration's adjustment methodology, the City exceeded its direct bonded debt ceiling in fiscal year 2000-01? If the \$987,147,000 is increased by 1.5 percent, the result is \$1,001,954,000. If the \$987,147,000 is increased by 4.0 percent, the sum of 1.5 percent and the 2.5 percent assumed inflation rate, the result is \$1,026,633.

Response: This comment is regarding the City's financial report and its contents, not the Refined LPA EIS. As the agency responsible for the City's financial report, the Department of Budget and Fiscal Services should be contacted regarding this comment.

3) Whether, according to the City Administration's 1.5 percent adjustment methodology, the City may issue bonds in fiscal year 2002-03 without violating the direct bonded debt ceiling for that fiscal year? According to Communication D-943 (2001), outstanding and unpaid general obligation bonds amounted to \$1,306,499,928 as of December 5, 2001.

Response: This comment is regarding the City's financial report and its contents, not the Refined LPA EIS. As the agency responsible for the City's financial report, the Department of Budget and Fiscal Services should be contacted regarding this comment.

55. From the fiscal year 1995-96 to the fiscal year 1998-99, the City annually received about \$100,000,000 in general obligation bond proceeds for the general obligation and highway improvement bond funds. Since then, the annual amounts of general obligation bonds received for those funds have increased. More notably, the City Administration proposes a major increase for the fiscal year 2002-03. The following table displays the data.

CITY GENERAL OBLIGATION BOND PROCEEDS OF GENERAL IMPROVEMENT BOND FUND AND HIGHWAY IMPROVEMENT BOND FUND (In Thousands of Dollars)

G.O. Bond Proceeds Of:	FY 95-96 Actual	FY 96-97 Actual	FY 97-98 Actual	FY 98-99 Actual
Gen. Imp. Bond Fund	\$70,081	\$91,437	\$87,444	\$77,000
Hwy Imp. Bond Fund	\$29,918	\$8,562	\$12,556	\$23,000
TOTAL	\$99,999	\$99,999	\$100,000	\$100,000

G.O. Bond Proceeds Of:	FY99-00 Actual	FY 00-01 Actual	FY 01-02 Estimated	FY 02-03 Proposed By City Admin.
Gen. Imp. Bond Fund	\$86,500	\$96,340	\$105,000	\$157,084
Hwy. Imp. Bond Fund	\$25,000	\$51,720	\$45,000	\$116,548
TOTAL	\$111,500	\$150,060	\$150,000	\$273,632

Sources: For fiscal year 1995-96 to fiscal year 2000-01, the pages showing the combined income statements for the capital project funds in the Comprehensive Financial Report for those fiscal years. For fiscal years 2001-02 and 2002-03, pages C-36 and C-37 of The Executive Program and Budget, Fiscal Year 2003, Volume I: Operating Program and Budget.

A discussion should be provided on the City Administration's intent with respect to the annual amounts of general obligation bonds planned to be issued for all City projects in the near future. The discussion is necessary to better integrate the capital funding plan for the Refined BRT Alternative with the projected funding of other capital improvement projects.

Response: In setting the GO Bond proceeds amount per year, the financial analysts kept the level within the ratios established by the City's Debt and Financial Policies as established in April 2002.

56. Table 6.1-12 on page 6-20 displays the annual general obligation bond requirements for the Refined BRT Alternative for the fiscal year 2001-02 through fiscal year 2004-05. No comparison is provided to past general obligation bond expenditures for transit projects.

Highway improvement bond fund expenditures for "utilities or other enterprises" may serve as a proxy for general obligation bond fund expenditures for transit projects. The "utilities or other enterprises" function appears to consist almost exclusively of such projects. Furthermore, most of the proceeds of the highway improvement bond fund are from general obligation bonds.<sup>15</sup>

<sup>15</sup> In the recent past, there were no expenditures from the general improvements bond fund for "utilities or other enterprises."

The following table compares (1) past highway improvement bond fund expenditures for "utilities or other enterprises" and expenditures/encumbrances/appropriations for one additional project against (2) the proposed general obligation bond funding requirements for the Refined BRT Alternative. The additional project is the Pearl City bus facility. For an unknown reason, appropriations for that project were made in fiscal year 1997-98 and fiscal year 1999-00 under the "general government" function, not "utilities or other enterprises."

Basically, the table shows that the proposed annual general obligation bond expenditures for the Refined BRT Alternative will be much greater than the past annual highway improvement bond expenditures for transit projects.



**COMPARISON OF HIGHWAY IMPROVEMENT BOND FUND EXPENDITURES FOR UTILITIES OR OTHER ENTERPRISES AND GENERAL IMPROVEMENT BOND FUND EXPENDITURES / ENCUMBRANCES / APPROPRIATIONS FOR PEARL CITY BUS FACILITY FROM FISCAL YEAR 1995 - 96 THROUGH FISCAL YEAR 2000-01 AGAINST ANNUAL GENERAL OBLIGATION BOND REQUIREMENTS FROM FISCAL YEAR 2001-02 THROUGH FISCAL YEAR 2004-05 FOR REFINED BRT ALTERNATIVE**  
(In Thousands of Dollars)

	FY 95-96 Actual	FY 96-97 Actual	FY 97-98 Actual	FY 98-99 Actual
Highway Imp. Bond Funds Expended for Utilities/ Other Enterprises	\$4,410	\$2,162	\$3,992	\$2,384
General Imp. Bond Funds Exp. /Enc. For Pearl City Bus Facility			\$4,999	
<b>Total</b>	<b>\$4,410</b>	<b>\$2,162</b>	<b>\$8,991</b>	<b>\$2,384</b>
			FY 00-01 Actual	
Highway Imp. Bond Funds Expended for Utilities / Other Enterprises	\$3,587		\$4,685	
General Imp. Bond Funds	\$1,100			
Approp. For Pearl City Bus Facility				
<b>Total</b>	<b>\$4,687</b>	<b>\$4,685</b>		
			FY 02-03 Proposed	FY 04-05 Proposed
G.O. Bond Requirement For Refined BRT	\$28,000	\$60,000	\$103,000	\$68,000

Sources: For fiscal year 1995-96 to fiscal year 2000-01, the pages with the income statements for the highway improvement bond fund in the Comprehensive Financial Report for the pertinent fiscal years. For the Pearl City bus facility, page 76 of The Executive Program And Budget, Fiscal Year 2000. Volume II: Capital Program And Budget and Ordinance 99-27. For fiscal year 2001-02 to fiscal year 2004-05, table 6.1-12 on page 6-20 of the SDEIS.

A discussion should be provided on the need for much greater general obligation bond expenditures for the Refined BRT Alternative than past general obligation bond expenditures for transit projects.<sup>18</sup> The discussion especially should address whether general obligation bonds will have to be diverted from highway and other non-transit projects.

Sources: For fiscal year 1995-96 to fiscal year 2000-01, the pages with the income statements for the highway improvement bond fund in the Comprehensive Financial Report for the pertinent fiscal years. For the Pearl City bus facility, page 76 of The Executive Program And Budget, Fiscal Year 2000. Volume II: Capital Program And Budget and Ordinance 99-27. For fiscal year 2001-02 to fiscal year 2004-05, table 6.1-12 on page 6-20 of the SDEIS.

A discussion should be provided on the need for much greater general obligation bond expenditures for the Refined BRT Alternative than past general obligation bond expenditures for transit projects.<sup>18</sup> The discussion especially should address whether general obligation bonds will have to be diverted from highway and other non-transit projects.

<sup>18</sup> A portion of the general obligation bond requirement is intended to fund the zipper lane and direct access ramps for the Regional BRT highway system. An argument may be made that the portion should be considered an expenditure for "highways and streets." That argument, however, would be unpersuasive. The major benefits of those facilities will be for transit, not regular traffic.

Response: The project uses General Obligation Bonds as the source of local financing, as directed by the City Council in Resolution No. 99-338, adopted in December 1999. The amount of those bonds that would be needed on an annual basis are stated in the financial analysis.

57. The last paragraph on page 6-10 states:

With regard to the first constraint, the assumption is that property values will remain flat and that the City would maintain the current property tax rate. This creates a ceiling on the amount of General Obligation Bonds the City would be able to issue because it limits the City's debt service payment capacity to the current level of property tax values.

(A) An explanation should be provided to reconcile the assumption of flat property values and tax rates with the assumption of 1.5 percent annual increase of future outstanding general obligation bond debt. See the third paragraph of page 6-11 for the assumption on the 1.5 percent annual increase. In particular, the explanation should discuss the City's ability to pay increasing general obligation bond debt service when general revenues from property taxes are flat.

(B) If an adequate explanation cannot be provided, the reference to the assumption of flat property values and tax rates should be deleted.

Response: An analysis was conducted to assure compliance with the City's Debt and Financial Policies, which included debt service payments on bonds issued before 2003, planned future notes and bonds, and additional bonds required as a result of this project.

58. The first full paragraph on page 6-12 states: "To meet the City's new farebox recovery policy the fares would need to increase slightly from those used in the financial analyses."

The necessary fare increase should be identified by year and amount. The City Administration also should consider proposing a bill to amend the transit fare schedule in Chapter 13, Revised Ordinances of Honolulu, 1990, to implement the necessary fare increase. The bill should have the appropriate future effective date.

Response: Fare increases will not be needed to meet the current City Council policy regarding farebox recovery ratio.

59. According to table 6.1-5 on page 6-13, the City general fund requirement for transit operating and maintenance will be \$98,817,000 in fiscal year 2004-05 and \$132,813,000 in fiscal year 2009-10. Those amounts are much more than the past, current, and proposed City general fund subsidies for bus operating and maintenance, as shown in the following table.

It is noted that, for the fiscal years 2004-05 and 2009-10, part of the projected general fund subsidies possibly may be offset by City highway funds. See the next comment.

COMPARISON OF GENERAL FUND SUBSIDY  
FOR TRANSIT OPERATING AND MAINTENANCE

	(In Thousands of Dollars)		
	FY 00-01 Actual	FY 01-02 Estimated	FY 02-03 Proposed
General Fund Subsidy For Transit O&M	\$37,518	\$46,422	\$42,176
General Fund Subsidy for Transit O&M	FY 04-05 Projected \$98,817*	FY 09-10 Projected \$132,813*	

\* Portion of the amount possibly may be replaced by City highway funds.

Sources: For fiscal year 2000-01, page 79 of the Comprehensive Annual Financial Report For The Fiscal Year Ended June 30, 2001. For fiscal year 2001-02 and fiscal year 2002-03, page C-16 of The Executive Operating Budget And Program, Fiscal Year 2003, Volume I: Operating Program and Budget. For fiscal year 2004-05 and fiscal year 2009-10, table 6.1-5 on page 6-13 of the SDEIS.

An explanation should be provided of where the additional general fund subsidy in future years will come from. The explanation should be consistent with the assumption in the last paragraph on page 6-10 "that property values will remain flat and that the City would maintain the current property tax rate." The explanation also should indicate whether transfers of City highway funds to the general fund are contemplated to ease the burden on the general fund in future years.

Response: The document is a disclosure of the amount that will be required as a general fund subsidy. It is not an obligation of the document to identify where the general funds will be allocated from.

60. Chapter 6 and the cash flow analysis of table E-3 do not discuss or identify a possible City highway fund offset of the City general fund subsidy for the Refined BRT Alternative.

The following table estimates the amounts of City highway funds that may be available to offset part of the City general funds required for the operating and maintenance costs of the Refined BRT Alternative in fiscal 2004-05 and fiscal year 2009-10.

ESTIMATE OF NET CITY HIGHWAY FUNDS AVAILABLE TO OFFSET PART OF CITY  
GENERAL FUND SUBSIDY FOR REFINED BRT ALTERNATIVE'S OPERATING AND  
MAINTENANCE COST

(In Thousands of Dollars)	FY 04-05 Estimated	FY 09-10 Estimated
Escalated City Highway Funds Before Reduction For Debt Service And Local Capital Match (Based on 2.5% Annual Escalation of \$33,991,000 Proposed City Highway Fund Transfer to Bus Transportation Fund in FY 02-03.)	\$35,712	\$40,405
Less City Highway Funds For Debt Service for Post-2002 Bonds Local Capital Match	Less: \$23,272 \$ 3,265	Less: \$25,698 \$ 8,116
Net City Highway Funds Available to Offset City General Fund Subsidy For Operating & Maintenance Cost	\$9,175	\$6,591

Sources: For the proposed \$33,991,000 City highway fund transfer to the bus transportation fund, page C-16 of the Executive Operating Budget, Fiscal Year 2003, Volume I: Operating Program and Budget. For debt service payments and local capital match, table E-3 on pages E-11 and E-12 of SDEIS.

(A) The City highway funds proposed to be transferred to the bus transportation fund in fiscal year 2002-03 is escalated by 2.5 percent annually, the same inflation rate assumed in the SDEIS.

(B) The escalated City highway fund amounts for fiscal year 2004-05 and fiscal year 2009-10 are reduced by the City highway funds necessary in those fiscal years to pay the debt service and provide the local capital match for the Refined BRT Alternative. The debt service and local capital match amounts are identified in table E-3 on pages E-11 and E-12.

The amounts remaining after the reductions are the net City highway funds estimated as available to offset the City general fund subsidies for the Refined BRT Alternative's operating and maintenance cost.

Response: Whether the City general fund subsidy comes from the general fund, the City highway fund, or from any other existing fund, is a financing implementation detail that should be determined by the City's Finance Department in accordance with the authorized budget approval process.

61. As is displayed, the net City highway funds available for the Refined BRT Alternative's operating and maintenance costs in fiscal year 2004-05 and fiscal year 2009-10 are much less than the City highway fund subsidy of \$33,991,000 for bus operating and maintenance proposed in fiscal year 2002-03.

The next table deducts from the projected City general fund subsidies for the Refined BRT Alternative's operating and maintenance costs the net City highway funds available for transit operating and maintenance. The table indicates that the City general fund subsidy for the Refined BRT Alternative's operating and maintenance will remain relatively large, even after the possible

offset by available City highway funds. For awareness of the magnitude of the potential subsidy, the following is offered: the City general fund subsidy proposed in fiscal year 2002-03 to subsidize the bus system's operating and maintenance cost is \$42,176,000.

PROJECTED CITY GENERAL FUND SUBSIDY,  
AFTER NET CITY HIGHWAY FUND OFFSET,  
FOR REFINED BRT ALTERNATIVE'S OPERATING AND MAINTENANCE  
IN FISCAL YEARS 2004-05 AND 2009-10  
(In Thousands of Dollars)

	FY 2004-05	FY 2009-10
Projected City General Funds Necessary For Refined BRT Alternative's Operating And Maintenance After Offset By City Highway Funds (Calculated as Subsidy In Table 6.1-5 On Page 6-13 of SDEIS Less net City Highway Funds Available for Offset In Preceding Table.)	\$89,642	\$126,222
	(\$98,817)	(\$132,813)
	Less	Less
	\$9,175)	\$6,591)

17 See page C-16 of The Executive Program And Budget, Fiscal Year 2003, Volume I, Operating Program And Budget.

Responses: An extensive analysis was conducted of the projected level and composition of City operating support associated with the Refined LPA for the FEIS. (See attached table). As noted in your comment, the City's operating support for transit is through transfers to the Bus Transportation Fund from the City Highway Fund and the City General Fund. In FY 2003, these transfers were approximately \$34.0 million from the City Highway Fund and approximately \$48.0 million from the City General Fund - the starting points for City operating support used in the cash flow analysis of the Refined LPA. In terms of composition, in 2003 the operating support was provided 42% from the City Highway Fund and 58% from the City General Fund.

Over the 2003-2025 projection period, the level of City operating support for transit is projected to increase in relation to the growth of transit operating costs and revenues. As shown in the attached table, in Year of Expenditure Dollars (inclusive of inflation), the total level of City operating support is projected to increase at a compound annual growth rate of 3.94%, from \$81.9 million in 2003 to \$181.7 million in 2025. In terms of constant 2002 dollars (excluding inflation), this is equivalent to the level of City operating support increasing at a compound annual growth rate of 1.41%.

ANALYSIS OF PROJECTED CITY OPERATING SUBSIDY FOR TRANSIT SERVICES  
FOR THE REFINED LOCALLY PREFERRED ALTERNATIVE IN THE FEIS

Year	City Operating Subsidy in 2002 Dollars	City Highway Fund (Assuming 1% Growth From 2002) (In 2002 Dollars)	City General Fund (Remaining After Highway Fund) (In 2002 Dollars)	% City Highway Fund	% City General Fund	Inflation Factor (2.5% per year) (2002 Constant Dollars)	City Operating Subsidy in 2002 Constant Dollars
2003	131,811	15,180	116,631	9.9%	80.1%	1.025	135,044
2004	141,118	16,310	124,808	10.0%	90.0%	1.051	142,083
2005	150,721	17,474	133,247	10.0%	90.0%	1.076	149,347
2006	160,645	18,672	141,973	10.0%	90.0%	1.101	156,835
2007	170,894	19,904	150,990	10.0%	90.0%	1.126	164,546
2008	181,471	21,170	160,301	10.0%	90.0%	1.151	172,479
2009	192,381	22,470	169,911	10.0%	90.0%	1.176	180,633
2010	203,628	23,804	179,824	10.0%	90.0%	1.201	189,007
2011	215,225	25,172	190,053	10.0%	90.0%	1.226	197,600
2012	227,176	26,576	200,600	10.0%	90.0%	1.251	206,412
2013	239,484	28,016	211,468	10.0%	90.0%	1.276	215,442
2014	252,153	29,492	222,661	10.0%	90.0%	1.301	224,690
2015	265,188	31,005	234,183	10.0%	90.0%	1.326	234,156
2016	278,594	32,556	246,038	10.0%	90.0%	1.351	243,839
2017	292,376	34,145	258,231	10.0%	90.0%	1.376	253,738
2018	306,539	35,772	270,767	10.0%	90.0%	1.401	263,853
2019	321,089	37,438	283,651	10.0%	90.0%	1.426	274,184
2020	336,031	39,144	296,887	10.0%	90.0%	1.451	284,731
2021	351,370	40,890	310,480	10.0%	90.0%	1.476	295,495
2022	367,112	42,676	324,436	10.0%	90.0%	1.501	306,476
2023	383,264	44,503	338,761	10.0%	90.0%	1.526	317,673
2024	400,832	46,371	353,461	10.0%	90.0%	1.551	329,087
2025	419,822	48,281	368,541	10.0%	90.0%	1.576	340,718

Compound Annual Growth Rate of City Operating Subsidy, with Inflation, 2003-2025: 3.84%

Compound Annual Growth Rate of City Operating Subsidy, in constant dollars, 2003-2025: 1.41%

62. Unlike the DEIS, the SDEIS does not discuss assumptions regarding the growth of the City highway fund. The assumptions are important since the conceptual capital funding plan proposes the use of City highway funds to pay the debt service incurred for the Refined BRT Alternative. Policy makers should be made aware of whether the City highway funds will have to be diverted from bus operations or other highway-related programs.

The following table displays the City highway fund revenues and percentage changes from the fiscal year 1995-96 through the fiscal year 2000-01.

	CITY HIGHWAY FUND REVENUES (In Thousands Of Dollars)		
	FY 95-96	FY 96-97	FY 97-98
Revenues	\$95,974	\$97,573	\$99,129
% Change From Previous Year	0.07%	0.6%	1.7%

	CITY HIGHWAY FUND REVENUES (In Thousands Of Dollars)		
	FY 98-99	FY 99-00	FY 00-01
Revenues	\$94,620	\$94,275	\$102,904
% Change From Previous Year	(4.5%)	(0.4%)	9.2%

\* The amount of revenues in fiscal year 1994-95 was \$96,908,000.

Sources: Pages with the income statements for the City highway fund in the Comprehensive Annual Financial Report for the pertinent fiscal years.

a. *If the financial plan for the Refined BRT Alternative assumes a City highway fund growth rate inconsistent with the approximate 1.2 percent average annual rate in the table, justification for the assumption should be provided.*

*Response: The SDEIS did not change any assumptions regarding the growth of the City highway fund that were used in the DEIS. Additional information made available prior to the FEIS shows Highway Fund revenues increased at a compound annual growth rate of 0.62 percent, with the major revenue sources in the Fund projected by the Finance Department to increase 1.6 percent annually over the next five years. For purposes of the financial analysis in the FEIS, the Highway Fund was projected to increase a more conservative 0.5 percent per year.*

b. *The City Administration's assumption on the growth rate of City highway fund expenditures for non-transit City programs also should be provided. Knowing the assumption should assist policy makers in determining whether the City highway fund will be sufficient to pay for both transit and non-transit programs. If the growth rate differs from the 2.5 annual inflation rate assumed for the SDEIS, the difference should be justified.*

*Response: We agree, and to the extent that such assumptions are known by the City, they have and will be built into the analysis.*

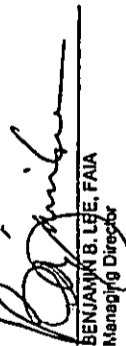
We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

FORWARDED:



BENJAMIN B. LEE, FAIA  
Managing Director

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**Final Environmental Impact Statement**  
**Primary Corridor Transportation Project**

**Chapter 7.0**

**Comments and Responses  
Neighborhood Boards  
and Community Groups**





## CONCERNS and QUESTIONS PERTAINING TO THE PROPOSED IN-TOWN BRT TRANSPORTATION PLAN

Testimony Submitted by the Planning and Land Utilization Committee,  
Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board

At the Committee meeting of October 25, the members of the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board reviewed several points pertaining to the proposed In-Town BRT transportation plan. At a Special Meeting scheduled for November 2, the committee will be presenting the following concerns and questions to the full Board, with the recommendation to reject the In-Town BRT portion of the proposed plan. Many of these questions and concerns have echoed throughout the area during community meetings on this proposal on September 28, and October 2, 5, 12, 16, 17, 23 and 25.

### Transportation and Land Use Patterns

Transportation planning is dependent on land use planning, yet the Primary Urban Center Development Plan revision has not been reviewed, approved, or adopted. Why is the transportation plan being placed ahead of the PUC Development Plan?

Why is the transit corridor being proposed for Kapiolani Boulevard, along which are large, undeveloped parcels, when there are more people on King Street?

In addition, the permanent BRT system proposed is planned to loop around Waikiki. Ironically, this displaces the local circulator with more frequent and convenient stops. This also jeopardizes the survival of local carmen who service Waikiki successfully and without subsidy, as disclosed in Appendix B of the 1999 Joint Waikiki Task Force Report.

Why would the City entertain the notion to immovably impact internal traffic patterns and visitor center support services with a high-capacity transit corridor in Waikiki?



### Transit System Technology Not Selected

The DEIS states that candidate technologies are not yet fully proven, so a decision on the type of transit technology need not be made at this point. If such a decision cannot be made, why is the City moving on a fast track towards approval of a \$1 Billion System, including equipment replacement - all to be paid by the taxpayer. What services and capital improvements will be necessary to sacrifice so this system can be paid for without raising taxes?

No physical traffic testing has been conducted to demonstrate the impact of the proposed separated lanes for the In-Town BRT, on Kapiolani Boulevard, University Avenue, Kalaheo Avenue, Kapahulu Avenue and Kubilo Avenue, or to show that lane dedication will result in less traffic competition. In fact, current conditions demonstrate that when lanes are blocked or closed on main thoroughfares, traffic migrates into peripheral areas and neighborhoods to circumvent the congestion.

There are no physical traffic tests in the Kapiolani/Kalaheo corridor to show that traffic congestion will not increase exponentially with the re-allocation of existing lanes to dedicated high-occupancy lanes, yet this plan is proposed to be permanently fixed within our main traffic arteries.

### Undisclosed Peripheral Parking to Serve the Proposed Fixed Transit in Waikiki

Peripheral parking locations to support the proposed In-Town BRT system from Kapiolani to Kapahulu are undisclosed in the DEIS. What impact will this have on the surrounding communities? The BRT Waikiki terminus is proposed for Kapahulu Avenue, yet the only available parking is at the Zoo parking for which is on Trust land and specific to park use. However, the 1999 Joint Waikiki Task Force Report recommends such facilities be placed at the Kapahulu Library or the base yard at the Ala Wai golf course.

### Undisclosed Linkage to Surrounding Communities

A "Kaimuki Transit Center" is listed with the Iwilei Transit Center and the Middle Street Transit Center in the DEIS, which states that "connections... to the regional and in-town BRT systems would occur at transit centers." However, the DEIS neither describes nor illustrates any linkage to the Kaimuki Transit Center which is now known to be planned for Waiālae Avenue. In addition, the proposed Primary Urban Center Development Plan revision issued in 1999 refers to "high capacity transit corridors" proposed for Kapahulu Avenue (Ala Wai golf course/park), Dale Street, and Waiālae Avenue. The PUC Development Plan revision also proposes "urban villages" and "village lots" on consolidated lots along these routes. Such consolidated development accessed by high capacity transit corridors also is proposed for McCully-Moiliili along King Street, Dale Street, the Sheridan area, and for Bingham Tract. Yet, all of the above linkages are virtually undisclosed and remain unaddressed in the DEIS.

Environmental Impact Statements are required for proposed publicly-funded projects when a finding of significant impact is made. Environmental Impact Statements are to address the cumulative impact of the larger project, as has been reaffirmed by the Hawaii State Supreme Court.

#### Impact on Parks

The DEIS is deficient by neglecting to disclose that Kapiolani Park is within the Diamond Head Special District, is listed on the Hawaii State Register of Historic Places, and is governed under the protective provisions of a public charitable Trust which precludes construction of municipal facilities and any other encumbrance of Trust lands.

We have learned through the DEIS and at a series of public meetings that a total of 24 power substations for the proposed system will be placed every half mile. These are described as being the size of a small house, and one is planned to be placed in Kapiolani Park, as shown on Transportation Map 14 dated July 24.

#### Loss of Street Landscaping

##### Impact on monkeypod tree corridor along Kapiolani

The DEIS states that "The majority of trees potentially affected are the monkeypods along Kapiolani Boulevard from Pensacola Street to Ikenberg Street" where they will be removed, relocated or cut back to make way for the transit corridor (5-28)

##### Impact on shower trees along University

X The DEIS states that the transit corridor will be constructed in the median lanes of University, thus necessitating the removal of the Shower trees recently planted.

##### Impact on monkeypod trees in Kapiolani Park

X The DEIS notes that monkeypod trees will be removed, replaced or cut back in Kapiolani Park

##### Loss of new landscaping fronting the Hawaii Convention Center

The DEIS states that "some landscaping would be lost fronting the Convention Center on the makai side of Kapiolani Boulevard in order to widen the Kapiolani/Kalaheua intersection to make way for the BRT. With the recently-planted lush landscape screening removed, would we then be left with a huge concrete facade which was intended to be concealed by landscaping?"

#### Impact on Waikiki Burial Sites and Viewplanes Along Kalaheua Avenue

The BRT is planned to run along a separated traffic lane on the makai side of Kalaheua Avenue. The Kalaheua Avenue/Waikiki Beach coastal viewplane is listed as one of Oahu's significant views identified in the City's Coastal View Study. Thus the proposed electric-rail transit corridor appears to be misplaced and counter to the "Hawaiian Sense of Place" that continues to elude City planners.

Kalaheua Avenue is also the location of ancient Hawaiian burials. Curiously, this is neither mentioned nor addressed in the DEIS, which refers only to burial sites along Middle Street and Kalia Road.

Why would the City entertain the notion to intrusively impact shoreline viewplanes, historic sites, and surrounding communities with a high-capacity transit corridor and peripheral requirements in Waikiki? Would not this transit experiment be better suited and better placed in the more open areas of Kapiolani and Central Oahu - where there could be more efficient use of time-proven technology and more time saved for more people over longer distances to the downtown destination?



DIAMOND HEAD/KAPAHULU/ST. LOUIS HEIGHTS NEIGHBORHOOD BOARD NO. 5  
11 STEUBENWOOD COMMISSION • CITY HALL ROOM 409 • HONOLULU, HAWAII

## RESOLUTION

IN SUPPORT OF THE T-S-M - ALTERNATIVE AND  
INCREASED FLEXIBILITY OF OAHU'S TRANSPORTATION SYSTEM  
AND  
IN OPPOSITION OF IN-TOWN PERMANENTLY FIXED TRANSIT LANES  
ON KAPIOLANI BOULEVARD, UNIVERSITY AVENUE, KALAKAUA AVENUE,  
KAPAHULU AVENUE, AND KUHO AVENUE

WHEREAS, the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board recognizes and appreciates the current progress and commitment of the City and County of Honolulu to improve and succeed with the Transportation System Management program, including a flexible hub-and-spoke local circulator system, and an articulated Express Bus and zipper lane system; and

WHEREAS, on August 16, 2000 the City and County of Honolulu issued a Major Investment Study and Draft Environmental Impact Statement for the Primary Urban Corridor Transportation Project (MIS/DEIS); and

WHEREAS, several community informational meetings have been held for the purpose of interpreting the MIS/DEIS prior to the public comment deadline of November 6, including on September 28 (community leaders at the Legislature), October 2 (community comments at the Convention Center), October 16 (in-town area concerned citizens discussion), October 17 (League of Women Voters meeting), October 23 (McCully-Moiliili district community meeting), October 25 (Diamond Head/Kapahulu/St. Louis Heights district community meeting), with opportunities for public testimony before the City Council Transportation Committee during two special informational meetings on October 5 and October 26, and as required by the regulatory process on October 12; and

WHEREAS, there is overriding concern that although transportation planning is dependent on land use planning, the proposed in-town transit plan is being quickly placed ahead of the 1999 Primary Urban Center Development Plan revision which has not been publicly reviewed, approved, or adopted; and

WHEREAS, there is overriding concern that no physical traffic testing has been conducted to determine the impact of separated lanes for the proposed in-town tram corridors on Kapiolani Boulevard, University Avenue, Kalakaua Avenue, Kapahulu Avenue and Kuhio Avenue, or to demonstrate that such traffic lane re-allocation will result in less traffic congestion; and

WHEREAS, although this system is proposed to be permanently fixed within Honolulu's main traffic arteries, there is overriding concern that no physical traffic tests in the Kapiolani/Kalakaua corridor have been conducted to demonstrate that vehicular traffic congestion will not increase exponentially with the permanent re-allocation of existing vehicular traffic lanes to dedicated high-occupancy lanes, and that traffic squeezed out of these main thoroughfares will not overflow or migrate into the surrounding communities and neighborhoods, as now demonstrated by current conditions during roadwork, water main, and other infrastructural repairs; and

WHEREAS, the MIS/DEIS relies on arbitrary ridership projections based on today's needs for the proposed in-town transit system (stemming from the 1990 islandwide Oahu Census, as revised downward by 50,000 in 1999 by the State Department of Business, Economic Development and Tourism and as arbitrarily allocated solely to the Primary Urban Center) but does not take into consideration a) the decrease in automobile registrations and bus ridership, b) more employees and businesses choosing "telecommuting", and c) the State administration advocating staggered work hours for City and State employees, nor does the MIS/DEIS disclose who the potential riders are and how the operations costs and subsidies would be shared between the proposed in-town ridership and Honolulu taxpayers; and

WHEREAS, there is overriding concern that a permanent in-town tram system is proposed to consume a needed eastbound traffic lane on Kalakaua Avenue so it might loop around Waikiki - displacing local circulator carriers who provide frequent and convenient stops, jeopardizing the survival of such carriers who service Waikiki successfully and without subsidy (see: 1999 Joint Waikiki Task Force report, Appendix B), and impacting transport and delivery routes for goods and services that are Waikiki's lifeline to survival as a major visitor destination; and

WHEREAS, there is overriding concern that the MIS/DEIS discloses that candidate technologies for the proposed in-town system are not yet fully proven and a decision on the type of transit technology cannot be made at this point, yet the City is moving on a fast track towards approval of a \$1 billion system, including future equipment replacement; and

WHEREAS, because the technology proposed for the in-town tram transit system has not been selected, there is overriding concern that state-of-the-art technology is advancing so rapidly that such a permanently-fixed system as the one proposed may indeed be outdated by more flexible alternative energy systems before it can be completed; and





WHEREAS, there is overriding concern that elected City officials have recently claimed there will be no increase in taxes to build the proposed in-town transit system, but they neglect to define whether any City services or necessary capital improvements will be sacrificed so this system can be paid for without raising taxes; and

WHEREAS, there is overriding concern that peripheral parking locations for Waikiki hotel and shop employees as recommended in the Joint Waikiki Task Force report of December, 1999, and the power sub-station locations to be built every half mile to support the proposed fixed in-town tram system from Kapiolani Boulevard to Kapahulu Avenue as mentioned in the MIS/DEIS, and their impacts on surrounding communities and parklands, are undisclosed in the MIS/DEIS; and

WHEREAS, there is overriding concern that the proposed Primary Urban Center Development Plan revision issued in 1999 refers to "high capacity transit corridors" on Waiiale Avenue, Date Street, and Kapahulu Avenue (where the Ala Wai Golf Course is now being planned to become a major regional park attraction), and that the PUC Development Plan revision also proposes "urban villages" and "village inns" to be developed on consolidated lots along these routes, with such consolidated development accessed by high capacity transit corridors also proposed for McCully-Moiliili along King Street, Date Street, the Sheridan area, and for Bingham Tract, yet all of the above linkages are virtually undisclosed and remain unaddressed in the DEIS, which specifically refers to "Transit Villages of the Twenty-First Century" as a resource document; and

WHEREAS, there is substantive concern that an undefined "Kaimuki Transit Center" is listed with the Iwilei Transit Center and the Middle Street Transit Center in the DEIS, which states that "connections... to the regional and in-town BRT systems would occur at transit centers," however, the DEIS neither describes any location nor illustrates any linkage to the "Kaimuki Transit Center," which is also now represented to be planned as a neighborhood bus stop adjacent to a school on Waiiale Avenue or could be developed at other locations such as Market City; and

WHEREAS, there is overriding concern that the MIS/DEIS is deficient by neglecting to disclose that Kapiolani Park is within the Diamond Head Special District, that Kapiolani Park is listed on the Hawaii State Register of Historic Places, that Kapiolani Park is protected under the provisions of a public charitable Trust which precludes construction of municipal facilities or any other encumbrance of Trust lands, and that one of 24 power sub-stations the size of a "small house" is planned to be constructed within Kapiolani Park Trust lands (see: In-Town BRT Map No. 14, dated July 24, 2000); and

WHEREAS, there is overriding concern that a) the MIS/DEIS states that "The majority of trees potentially affected are the monkeypods along Kapiolani Boulevard from Pensacola Street to Isenberg Street" where they will be removed, relocated or cut back to make way for the transit corridor, b) that transit corridor exclusive median lanes will be constructed along the length of University Avenue, together with platforms and divisive curbs that bisect the main thoroughfare and the community and neighborhoods through which it runs, and which will necessitate the

and the community and neighborhoods through which it runs, and which will necessitate the removal of the recently-planted Shower trees, and c) that historic monkeypod trees will be removed, replaced or cut back in the vicinity of Kapiolani Park, yet the MIS/DEIS is vague and unresponsive regarding the exact locations, and the size and value of these historic trees and landscapes; and

WHEREAS, there is serious concern that the MIS/DEIS states that "some landscaping would be lost fronting the Convention Center on the makai side of Kapiolani Boulevard in order to widen the Kapiolani/Kalaka'au intersection" to make way for the BRT, and, with the recently-planted lush landscape screening removed, this prominent street frontage would then be left with a huge concrete facade which was intended to be concealed, softened and cooled by landscaping; and

WHEREAS, there is serious concern that the planned changes to the physical environment, including the removal of trees and the addition of lanes bisecting neighborhoods, will contribute to a loss in the quality of life for the residents living adjacent to these transit corridors; and

WHEREAS, there is serious concern that the in-town tram system is planned to run along a separated traffic lane on the makai side of Kalakaua Avenue, impacting the Kalakaua Avenue/Waikiki Beach coastal viewplane, listed as one of Oahu's significant views identified in the City's "Coastal View Study"; and

WHEREAS, there is serious concern that the in-town tram system is planned to run along a separated traffic lane on the makai side of Kalakaua Avenue, further impacting ancient Hawaiian burials, which are neither mentioned nor addressed in the MIS/DEIS, which refers only to burial sites along Middle Street and Kalia Road; and

WHEREAS, Environmental Impact Statements are required for proposed publicly-funded projects when a finding of significant impact is made, and are required to address the cumulative impact of the larger project, as has been reaffirmed by the Hawaii State Supreme Court; and

WHEREAS, the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board recognizes that public concerns have escalated regarding the proposed in-town separated transit lanes, and public comments from the community sector have repeatedly reflected questions and concerns in common that indicate the MIS/DEIS a) premature and without the capability to represent a defined technology or related costs thereof, b) segmented and does not address the cumulative impact of the larger project as required by federal and state environmental impact statement regulations, and c) incomplete by neglecting to address the types of transit contemplated to access certain locations, the linkage to and types of transit centers and facilities at other locations, and how the components of the proposed plan correlate with the existing Primary Urban Center Development Plan and its 1999 proposed revisions, and d) inadequate in defining mitigation of the increased congestion caused by converting existing traffic lanes into separate transit corridors to accommodate fixed transit lanes; now therefore

BE IT RESOLVED, that the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board requests that further consideration of the MIS/DEIS be delayed until the Primary Urban Center Development Plan revision has been publicly reviewed, approved, and adopted - including any conceptual "urban villages" and "village inns" proposed to be developed on consolidated lots and accessed by "high capacity transit corridors" along Waiānāe Avenue, Date Street, and Kapahulu Avenue (where the Ala Wai Golf Course is now being planned to become a major regional park attraction), as well as in McCully-Moiliili along Date Street, King Street, the Sheridan area, and within Bingham Tract - since transportation planning is integrally related to land use planning; and

BE IT FURTHER RESOLVED, that the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board requests that further consideration of the MIS/DEIS be delayed until all segments of the larger project are fully disclosed and described in the MIS/DEIS, including peripheral parking locations contiguous to Waikiki and linkages to outlying transit centers at undisclosed locations, such as the "Kaimuki Transit Center" mentioned in the MIS/DEIS; and

BE IT FURTHER RESOLVED, that the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board opposes closure of vital vehicular traffic lanes and re-allocation of such to any separated high-occupancy vehicle transit lanes from Ward Avenue to Kapahulu Avenue until physical traffic testing is conducted over a period of several months, including along Kapiolani Boulevard, University Avenue, Kalakaua Avenue, Kapahulu Avenue and Kūhio Avenues, to demonstrate successful mitigation of the expected exponential traffic overflow impact on surrounding communities and neighborhoods; and

BE IT FURTHER RESOLVED, that the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board opposes construction of an in-town fixed and separated transit corridor loop around Waikiki, including along Kapahulu Avenue, that disrupts the transport and delivery of goods and services, that displaces local circulator carriers who provide frequent and convenient stops, that jeopardizes the survival of such carriers who service Waikiki successfully and without subsidy, and that impacts transport and delivery routes for goods and services that are Waikiki's lifeline to survival as a major visitor destination; and

BE IT FURTHER RESOLVED, that the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board opposes construction of an in-town fixed and separated transit corridor loop around Waikiki, including along Kapahulu Avenue, e) that necessitates the construction of power substations and peripheral parking for its support within the Diamond Head Special District and/or within Kapiolani Park Trust lands as listed on the Hawaii State Register of Historic Places, and b) that is permanently embedded on the makai side of Kalakaua Avenue, impacting the one of Oahu's significant views, the Kalakaua Avenue/Waikiki Beach coastal viewplane, and disturbing ancient Hawaiian burials along the Kalakaua Avenue shoreline; and

BE IT FURTHER RESOLVED, that the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board opposes construction of an in-town fixed and separated transit corridor a) along Kapiolani Boulevard where the MIS/DEIS states that, "The majority of trees potentially affected are the monkeypods along Kapiolani Boulevard from Pensacola Street to Ikenberg Street" where they will be removed, relocated or cut back to make way for the transit corridor, b) along University Avenue where a fixed two-way transit corridor is planned to be constructed in the street median, thus necessitating the removal of the recently-planted Shower trees, c) within the Kapiolani/Kalakaua intersection on the makai side of Kapiolani Boulevard where the MIS/DEIS states that the recently-planted costly landscaping fronting the Convention Center would be lost to make way for the BRT, and d) within the Diamond Head Special District and Kapiolani Park Trust lands where the MIS/DEIS indicates historic monkeypod trees will be removed, replaced or cut back; and

BE IT FURTHER RESOLVED, that the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board requests delay of an in-town separated high-occupancy vehicle lanes along Kapiolani Boulevard, University Avenue, Kalakaua Avenue, Kapahulu Avenue and Kūhio Avenues until a) candidate technologies for the proposed in-town system are fully proven and a decision on the type of transit technology can be made, b) advancing state-of-the-art technology can ensure a reliable, economic and efficient transportation system with more flexible operations, and c) until the City and County of Honolulu can demonstrate that the cost to develop such a system will ensure that there will be neither an increase in local taxes nor sacrificing of City services, repairs, operations, improvements, or any other necessary day-to-day functions of the City, no matter whether they are budgeted and funded under capital improvements or under operations; and

BE IT FURTHER RESOLVED, that the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board opposes any high-capacity transit corridor, peripheral facilities and ancillary infrastructure that will adversely or intrusively impact Waikiki shoreline viewplanes, historic sites and landscapes, parklands, internal traffic patterns, visitor center support services, surrounding communities and neighborhoods, and the "Hawaiian Sense of Place"; and

BE IT FURTHER RESOLVED, that the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board advocates full reconsideration of planning high-capacity transit corridors from Ward Avenue to Kapahulu Avenue and determination in the future where there could be more efficient and flexible use of time-proven technology with more time saved for more people over longer distances to the downtown destination; and

BE IT FURTHER RESOLVED, that the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board rejects the "Bus Rapid Transit" (BRT) Alternative, a fixed grade-level separated transit lane system proposed for the area inclusively between Middle Street and Kapahulu Avenue, and specifically along Kapiolani Boulevard, University Avenue, Kalakaua Avenue, Kapahulu Avenue, and Kūhio Avenue, for the reasons stated and outlined above; and



BE IT FURTHER RESOLVED that the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board strongly recommends the Transportation System Management (TSM) Alternative, a flexible and modifiable bus transit system, as the Preferred Alternative for the Primary Corridor Transportation Project, and supports the best efforts of the City and County of Honolulu to fulfill the commitment to expand and upgrade Honolulu's present bus transportation system to its fullest potential and to ensure that it is efficient, cost-effective and reliable; and

BE IT FINALLY RESOLVED, that this Resolution be sent via U.S. Postal Service Certified Mail to the Regional Administrator, Region IX, Federal Transit Administration; Governor Ben Cayetano, State of Hawaii; State Historic Preservation Division; Department of Land and Natural Resources; Director Kazu Hayashida, State Department of Transportation; State Senators Les Ihara, Jr., Carol Fukunaga, and Brian Taniguchi; State Representatives Calvin Szy, Brian Yamane, Scott Saito and Galen Fox; Mayor Jeremy Harris, City and County of Honolulu; Honolulu City Councilmembers Duke Baimum, Andy Mirikitani, Jon Yoshinura, Romy Cachola, Gary Okino, John DeSoto, Rene Mansho, Steve Holmes and John Henry Felix; Director Cheryl Soon, Department of Transportation Services; Director Randall Fujiki, Department of Planning and Permitting; Neighborhood Boards 2 through 11; the League of Women Voters; Scenic Hawaii, Inc.; the Outdoor Circle; Kapiolani Park Preservation Society; Kapiolani Park Advisory Council; Save Diamond Head Association; Waikiki Residents Association; Kapahulu Neighbors Association; E Noa Tours; Charley's Taxi; TransHawaiian Services; Hawaii Teamsters and Allied Workers Local 996; Hawaii Hotel Association; and the Waikiki Improvement Association.

Resolution adopted by the Diamond Head/Kapahulu/St. Louis Neighborhood Board on November 2, 2000.

*Karen Ah Mai*

Karen Ah Mai, Chairperson

November 6, 2000

Ms. Donna Turchie  
Senior Transportation Representative  
Federal Transit Administration, Region IX  
U.S. Department of Transportation  
201 Mission Street, Suite 2210  
San Francisco, California 94105-1839

Ms. Genevieve Salmonson, Director  
Office of Environmental Quality Control  
State Office Tower, Suite 702  
235 South Beretania Street  
Honolulu, Hawaii 96813

Ms. Cheryl Soon  
Department of Transportation Services  
City and County of Honolulu  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813

Mr. Robert Bramen  
Parsons, Brinckerhoff, Quade & Douglas, Inc.  
Pacific Tower, Suite 3000  
1001 Bishop Street  
Honolulu, Hawaii 96813

Subject: Primary Corridor Transportation Project  
Major Investment Study/Draft Environmental Impact Statement

Dear Ms. Turchie, Ms. Salmonson, Ms. Soon and Mr. Bramen:

Enclosed please find our response to the Primary Corridor Transportation Project Major Investment Study/Draft Environmental Impact Statement. This response was transmitted via facsimile to the State Office of Environmental Quality Control and the City Department of Transportation Services on November 6, 2000.

We are pleased to inform you that we strongly support continuation and full implementation of the flexible and modifiable Transportation Service Management (TSM) Alternative to serve the entire Primary Corridor, including the urban Honolulu segment between Middle Street and Kaimuki. However, with respect to Bus Rapid Transit (BRT) Alternative, there appears to be sufficient reason to expect significant adverse In-Town impacts from the magnitude of this proposed cumulative transportation project on traffic patterns, business districts, neighborhoods, private transportation carriers, and surrounding communities.

Thus, we find we can neither support nor recommend the proposed In-Town BRT Alternative for the purpose of the public decision-making process on this project.



Ms. Donna Turchie, Ms. Genevieve Salmonson  
Ms. Cheryl Soon, Mr. Robert Bramen  
November 6, 2000  
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For the purpose of this response, you will find that our concerns, questions and comments focus on the proposed BRT Alternative. Our specific concerns include, but are not limited to, the following:

- ▶ lack of correlation to pending Primary Urban Center development plan revisions;
- ▶ absence of information and location of impacts on registered historic sites, landscapes, parklands, and ancient burial sites;
- ▶ incomplete and questionable community involvement and consensus in recommending specific components, facilities, and routes for the BRT Alternative;
- ▶ absence of traffic testing for cumulative traffic impacts;
- ▶ public and private circulator transportation, service and delivery operations and traffic impacts;
- ▶ major infrastructure and utility impacts;
- ▶ absence of defined and proven technology and associated cumulative capital costs and operations subsidies;
- ▶ absence of ancillary facilities descriptions, locations, linkages and impacts on surrounding communities;
- ▶ compromised present quality of life and "Hawaiian Sense of Place", e.g. destruction and/or adverse impact to scenic viewplanes and landscapes to provide for embedded rapid transit infrastructure, utilities and facilities;
- ▶ incomplete expansion and improvement of the present Transportation Service Management program to its fullest potential, including the hub-and-spoke circulator system, express and articulated vehicles, dedicated freeway "zipper" lanes, and public and private ridership incentives, prior to consideration of an embedded rapid transit alternative.

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Therefore, based on the information provided for the purpose of the public decision-making process on this project, by strong consensus we have elected to reject the In-Town BRT Alternative. A copy of the Board's Resolution to this effect is provided for your review. In addition, we will be presenting this recommendation along with our concerns to the Honolulu City Council during their deliberations on Resolution 00-249, "Selection of a Locally Preferred Alternative for the Primary Corridor Transportation Project".

We look forward to your response on the attached concerns, questions and comments.

Very truly yours,

*Karen Ah Mai*

*Michelle Spalding*

Karen Ah Mai, Chairperson  
Diamond Head/Kapahulu/St. Louis Heights  
Neighborhood Board

Michelle Spalding, Chairperson  
Planning and Land Utilization  
Committee Chairperson

cc: Federal Highway Administration  
Oahu Metropolitan Planning Organization  
Honolulu City Council



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**RESPONSE TO THE PRIMARY CORRIDOR TRANSPORTATION PROJECT  
 MAJOR INVESTMENT STUDY/DRAFT ENVIRONMENTAL IMPACT STATEMENT:**

**CONCERNS, QUESTIONS and COMMENTS**

The Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board recognizes and appreciates the current progress and commitment of the City and County of Honolulu to improve and succeed with the Transportation System Management (TSM) program, including a flexible hub-and-spoke local circulator system, and an articulated Express Bus and zipper lane system. The City administration, in attempting to address this goal over the past eight years, is now demonstrating some success with TSM objectives as the City's potential to meet this commitment is slowly being explored.

But now comes the Major Investment Study and Draft Environmental Impact Statement for a Primary Urban Corridor Transportation Project (MIS/DEIS), introduced by the City administration on August 16, 2000. This document logically includes progressive implementation of the TSM components for the West Oahu area to Middle Street, on the periphery of downtown Honolulu. However, upon addressing the downtown area, the City proposes to develop an entire new embedded system, the Bus Rapid Transit (BRT) Alternative, along established landscaped boulevards and scenic routes within the urban area up to and including the shoreline resort area of Waikiki.

The proposed embedded system, envisioned and presented by City officials as a simulated genetic electrically-propelled articulated tram arriving every two (2) to four (4) minutes, is presently whizzing by the Honolulu public in the form of a potential City Council Resolution. City officials have developed a folksy promotional which focuses on their already-apparent preferred alternative, the in-town BRT as described in the MIS/DEIS. Presentations given to the Waikiki area community on the proposed system were held by City officials in rapid sequence on October 2, October 5, October 12 and October 26 in anticipation of one (1) City Council Transportation Committee meeting on November 14, and one (1) full City Council meeting on November 29 to decide on their Preferred Alternative. In addition, several Waikiki area community informational meetings have been held attempting to interpret, evaluate and respond to the MIS/DEIS by the public comment deadline on November 6, including on September 28 (community leaders at the Legislature), October 16 (in-town area concerned citizens discussion), October 17 (League of Women Voters meeting), October 23 (McCully-Moiliili district community meeting), October 25 (Diamond Head/Kapahulu/St. Louis Heights district community meeting). Over this short time, public concerns have escalated regarding the proposed in-town separated transit lanes, and public testimony from the community sector has repeatedly reflected questions and concerns in common.

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**THE PRIMARY URBAN CENTER DEVELOPMENT PLAN OR THE PRIMARY  
 CORRIDOR TRANSPORTATION PROJECT? - THE CART BEFORE THE HORSE**

A significant point that has been repeatedly stated by representatives of the interested and affected community is that the proposed in-town transit plan is being quickly placed ahead of the 1999 Primary Urban Center Development Plan revision, even though transportation planning decisions depend upon existing land uses and land use planning in the urbanized Honolulu area. Although some may emphasize that subsidized rapid transit drives development, thus benefiting private investors and landowners at the expense of the Honolulu taxpayer, established land uses demand that transportation planning must follow adopted development plan guidelines.

The finalized PUC Development Plan revision has not been publicly reviewed, approved, or adopted, although a draft version was floated by the City administration one year ago with public informational meetings held during the holiday season in 1999. The proposed Development Plan draft revision also promoted the concept of "high capacity transit corridors" on Waialae Avenue, Date Street, and Kapahulu Avenue, where the Ala Wai Golf Course is now being envisioned by the State administration to become a major regional park attraction, and "urban villages" and "village inns" to be developed on consolidated lots along these routes, - with such consolidated development accessed by high capacity transit corridors also proposed for the McCully-Moiliili area along King Street and Date Street, the Sheridan area, and Bingham Tract. Yet, all of the above linkages are virtually undisclosed and remain unaddressed in the MIS/DEIS, which specifically refers to "Transit Villages of the Twenty-First Century" as a resource document (MIS/DEIS @ 5-6). Therefore, it is highly evident that the MIS/DEIS is incomplete even in draft form, and it is of overriding concern that the cumulative impact of the Larger Project remains undisclosed.

In addition, there is also justified concern about the undisclosed linkage to an undefined "Kaimuki Transit Center", as listed with the Iwilei Transit Center and the Middle Street Transit Center in the MIS/DEIS (figure 2.5-1B @ 2-39) which states that "connections... to the regional and in-town BRT systems would occur at transit centers" and "enhanced local circulation and access to the BRT systems..." and "intermodal access (e.g., automobile, pedestrian, bicycle) and intramodal access (e.g., connections between feeder and line haul transit routes) to the regional and in-town BRT systems would occur at transit centers and park and ride lots" (MIS/DEIS @ 2-18 and 2-22). Further, the D-EIS describes transit centers as having certain characteristics, such as passenger shelters, retail and public facilities, and street furniture, ornamental lights and landscaping (MIS/DEIS @ 5-40). However, the MIS/DEIS neither describes any location nor illustrates any linkage to the "Kaimuki Transit Center", which is also now represented at public meetings to be planned as a "neighborhood bus stop" adjacent to a school on Waialae Avenue. However, because this proposed facility it is charted in the MIS/DEIS as a Transit Center at an undisclosed location in Kaimuki, by such mention the MIS/DEIS might also be authorizing such a development at other hub sites on Waialae Avenue, such as Market City where Kapiolani Boulevard, Kapahulu Avenue and Waialae Avenue intersect.

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1 Of equal concern is the curious absence of peripheral parking locations for Waikiki hotel and shop  
 2 employees as briefly mentioned in the MIS/DEIS and as independently recommended in the Joint  
 3 Waikiki Task Force report of December, 1999, and the impact this will have on surrounding  
 4 communities. However, the MIS/DEIS does point out that it has been seen in other cities that most  
 5 land use impacts are generally concentrated within 1/4 mile of a transit stop (MIS/DEIS @ 5-10).  
 6  
 7 The PUC Development Plan portends, "Develop strategically located parking garages to support...  
 8 transit stations" and "...a comprehensive transportation system... can be accomplished through the  
 9 use and development of... parking areas on the periphery..." (PUC-DP @ 4-2 and 4-15). The 1999  
 10 Joint Waikiki Task Force report states that more needs to be done outside Waikiki to connect to  
 11 Waikiki, that peripheral parking locations need to be provided with locations to be determined, and  
 12 that passenger service should be allowed to be structured by employers (hotels and shops). (See  
 13 JWTF report, Appendices K-9 and B-5.) Further, the Joint Waikiki Task Force has stated that  
 14 "Development of a system of new parking sites for Waikiki and Oahu residents and employees of  
 15 Waikiki businesses served by the Waikiki Circulator might include the City and County base yard  
 16 on Kapahulu ...and perhaps a portion of Jefferson School (JWTF Report, p. 5). The Waikiki  
 17 Improvement Association's Agenda for Kapahulu Avenue recommends encouraging the  
 18 redevelopment of the areas now occupied by the City's Kapahulu base yard (Ala Wai Golf Course)  
 19 and the State's Kapahulu Library for uses consistent with... transportation needs" (JWTF Report,  
 20 Appendix J, WIA Agenda Project 3). At a local visioning group meeting on June 21, a City  
 21 Councilman and Kapiolani Park Trustee encouraged consideration of the Zoo parking lot in  
 22 Kapiolani Park or Jefferson School as a municipal parking and transit center. And, at the City  
 23 Council presentation of the MIS/DEIS and preliminary public hearing on October 5, the Waikiki  
 24 Improvement Association representative stated, "The tram will improve access to Waikiki for  
 25 employees... there is a 24-hour-day work schedule. The priority is to accommodate the Waikiki  
 26 work force." The draft "Kapahulu Community Plan" dated August, 2000, also states, "At various  
 27 times, the... Ala Wai Base Yard has been considered as a site for a regional transportation facility,  
 28 such as peripheral parking or a bus staging area for Waikiki" and, in response to the Ala Wai base  
 29 yard as a major new transit and parking facility, "in view of its proximity to Waikiki, this site has  
 30 long been suggested as a location for peripheral parking for those who visit or work in Waikiki or as  
 31 a staging area for commercial buses.... Advisory group members expressed concerns that a transit  
 32 center and parking facility would work against uniting the Kapahulu community. The site, which is  
 33 not centrally located along Kapahulu Avenue, would be mainly used as parking for employees of  
 34 Waikiki hotels" (KCP @ 5-16 and Appendix A-5). In Kapahulu, where there is a concerted effort  
 35 to calm traffic and revitalize the community business district, providing peripheral parking for  
 36 38,000 Waikiki hotel employees will undoubtedly have a devastating impact on the community.  
 37  
 38 The community visioning group emphasizes that "increased attention needs to be placed on  
 39 Kapahulu Avenue. Beautification efforts are long overdue... Once a pleasant arterial, Kapahulu  
 40 Avenue has evolved into a heavily-traveled major thoroughfare. Safety has become a major  
 41 concern. Traffic calming solutions are required to ensure that Kapahulu Avenue adequately  
 42 services and complements the area's streetfront retail activity and to mitigate against the  
 43 transformation of the town's main street into an unintended freeway." (JWTF Report, Ap. K-5).

1 As the location(s) of Waikiki peripheral parking facilities servicing the Waikiki segment of the  
 2 proposed fixed transit system, and the impact of access to them through surrounding communities  
 3 are not addressed in the MIS/DEIS, we emphasize that this should be accomplished before the  
 4 MIS/DEIS is given further consideration.  
 5  
 6 Further, City officials claim the components of the MIS/DEIS have been chosen and crafted by the  
 7 community. However, in light of community concerns and questions expressed at the recent public  
 8 meetings on the MIS/DEIS, this appears to be somewhat of a misrepresentation. In fact, on  
 9 November 2, the McCully-Moiliili community board announced, "The proposed dedicated fixed  
 10 tram routes through McCully-Moiliili community board announced, "The proposed dedicated fixed  
 11 Department of Transportation Services as the preferred routes voiced by McCully-Moiliili residents  
 12 during the Trans 2K community meetings, were never supported by participants from our  
 13 community..." The same can be said for the Diamond Head-Kapahulu community.  
 14  
 15 The Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board therefore requests that any  
 16 consideration of in-town separated transit lanes be deferred until a) the Primary Urban Center  
 17 Development Plan revision has been publicly reviewed, approved, and adopted; and b) until all  
 18 segments of the larger project are fully disclosed and described in the MIS/DEIS, including  
 19 peripheral parking locations contiguous to Waikiki and linkages to outlying transit centers at  
 20 undisclosed locations, such as, but not limited to, the "Kaimuki Transit Center" briefly referenced in  
 21 the MIS/DEIS.

UNDEFINED TECHNOLOGY, UNDISCLOSED COSTS

27 The MIS/DEIS is deficient in its analysis of alternative transportation technologies, confirms that  
 28 candidate technologies for the proposed in-town system are not yet fully proven, and admits that a  
 29 decision on the type of transit technology cannot be made at this point. Yet, the City is moving on  
 30 a fast track towards approval of a \$1 billion system at estimated base cost, including future  
 31 equipment replacement. Further, the MIS/DEIS ignores that state-of-the-art technological advances  
 32 will make today's plans obsolete, where such a permanently-fixed system as the one proposed may  
 33 indeed be outdated by more flexible, cost-effective alternative energy systems before the proposed  
 34 system can be completed.  
 35  
 36 There is also a weighty concern that elected City officials have recently claimed there will be no  
 37 increase in taxes to build the proposed in-town transit system, but they neglect to define whether  
 38 any City services and necessary capital improvements will be sacrificed so this system can be paid  
 39 for without raising taxes.

41 Thus, the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board advocates full  
 42 reconsideration of the proposed fixed high-capacity transit corridors along Kapiolani Boulevard,  
 43 University Avenue, Kalakaua Avenue, Kapahulu Avenue and Kuho Avenues to allow for a)

comprehensive urban Honolulu traffic management plan based on current, area-specific statistics; b) independent evaluation undertaken by nationally-recognized experts to determine where there can be more efficient and flexible use of transit options, with more time saved for more people over the greatest area; and c) future consideration of fully-proven candidate technologies, in order to define the most suitable type of transit technology for Honolulu and to ensure a reliable, economic and efficient transportation system with more flexible operations. In addition, the City and County of Honolulu will need to demonstrate the claim that the cost to develop such a system will ensure that there will be neither an increase in local taxes nor sacrificing of City services, repairs, operations, improvements, or any other necessary day-to-day functions of the City, no matter whether they are budgeted and funded under capital improvements or under operations

#### SITE-SPECIFIC TRAFFIC TESTING and ADDED TRAFFIC CONGESTION

Another overriding concern expressed by community leaders and concerned citizens is that no physical traffic testing has been conducted to determine the impact of separated lanes for the proposed in-town tram corridors on Kapiolani Boulevard, University Avenue, Kalakaua Avenue, Kapahulu Avenue and Kubio Avenue, or to demonstrate that such traffic lane re-allocation will result in less traffic congestion.

Consequent to separated transit corridor lanes and platforms consuming major portions of traffic arteries and thoroughfares, traffic congestion and gridlock will escalate even if fewer people are driving cars and more are using rapid transit. In addition, the MIS/DEIS states that such would result in a reduced level of service for auto traffic within the urban core.

Further, the MIS/DEIS states that parades and large events will not be affected, as rapid transit would be rerouted and replaced by buses during parades and large events (see MIS/DEIS @ 4-19 and 4-29). As parades are frequent in Waikiki, and the JWF recommends even more festivals and parades to "Recapture the Magic of Waikiki", rapid transit could conceivably be replaced by buses more often than not.

Although this system is proposed to be permanently fixed within Honolulu's main traffic arteries, there is serious concern that there has been no effort to demonstrate that a) that no massive gridlock will occur, b) that vehicular traffic congestion will not increase exponentially with the permanent re-allocation of existing vehicular traffic lanes to dedicated high-occupancy lanes, and c) that traffic squeezed out of these main thoroughfares will not overflow or migrate into the surrounding communities and neighborhoods, as now demonstrated by current conditions during roadwork, water main, and other infrastructure repairs.

The Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board opposes further consideration of in-town separated transit until physical traffic testing is conducted over a period of several months, including along Kapiolani Boulevard, University Avenue, Kalakaua Avenue, Kapahulu Avenue and Kubio Avenues, to demonstrate successful mitigation of the expected exponential traffic overflow impact on surrounding communities and neighborhoods.

In addition, the MIS/DEIS relies on arbitrary ridership projections for the proposed in-town transit system "based on today's needs", as stated by a City transportation consultant. Such projections stem from the 1990 islandwide Oahu Census, as revised downward by 50,000 in 1999 by the State Department of Business, Economic Development and Tourism and as arbitrarily allocated solely to the Primary Urban Center by the City for the purpose of the MIS/DEIS and qualifying for federal funds. However, in addition to arbitrary allocation of islandwide population to the Primary Urban Center for the purpose of the MIS/DEIS, such arbitrary projections do not take into consideration a) the decrease in automobile registrations and bus ridership, b) corporate incentives for ride-sharing and van-pooling, c) more employees and businesses now choosing "telecommuting" over commuting to a downtown office, and d) the State administration advocating staggered work hours for City and State employees. Nor does the MIS/DEIS disclose who the perceived potential riders are other than the current bus ridership, and how they can be ejected out of their valued vehicles - or how the in-town fixed transit operations costs and subsidies would be shared between the proposed in-town ridership and Honolulu taxpayers. Due to such arbitrary and incomplete statistical and fiscal information, we question the urgency to make a decision on establishing the proposed in-town dedicated fixed transit system.

Expressed concerns have also been presented regarding the proposed in-town tram system's consumption of the needed eastbound traffic lane on Kalakaua Avenue so the system might loop around Waikiki. One lane removal has recently occurred, where the City has reduced four traffic lanes to three lanes along Kalakaua Avenue in order to expand the Kuhio Beach recreation area. With the proposed addition of a dedicated rapid transit lane, traffic would be reduced to two lanes that would include stopping and loading by delivery, tour and other commercial transportation vehicles. This portends disaster for Waikiki by causing further congestion and gridlock of Waikiki's internal traffic and services. Thus, removal of any of the remaining vital vehicular traffic lanes on Kalakaua Avenue is unthinkable and unwarranted.

The MIS/DEIS is deficient in addressing the proposed in-town fixed transit system's impact on private transportation systems. Pertaining to the proposed in-town fixed transit system in Waikiki, transportation carriers, unions and hotel interests have expressed concerns that include a) displacement of established local carriers who provide frequent and convenient stops, b) jeopardy to the survival of such carriers who service Waikiki successfully and without subsidy (see: 1999 Joint Waikiki Task Force report, Appendix B), c) impact to tax revenues by such losses while spending more on higher public transportation subsidies, d) restricted curb lanes for trams running every four (4) minutes that force tour buses, trolleys and taxis to unload elsewhere and to use limited vehicular lanes to do so (see MIS/DEIS @ 4-24), and d) impact on transport and delivery routes for goods and services that are Waikiki's lifeline to survival as a major visitor destination.

1 The Diamond Head/Kapahulu St. Louis Heights Neighborhood Board opposes construction of an  
2 in-town fixed and separated transit corridor loop around Waikiki that disrupts the transport and  
3 delivery of goods and services, displaces local circulator carriers who provide frequent and  
4 convenient stops, jeopardizes the survival of such carriers who service Waikiki successfully and  
5 without subsidy, and that impacts transport and delivery routes for goods and services.  
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#### 8 ADDITIONAL SIGNIFICANT IMPACTS

9 There is paramount concern that the MIS/DEIS is seriously deficient by neglecting to disclose that  
10 Kapiolani Park is within the Diamond Head Special District; that the Park is listed on the Hawaii  
11 State Register of Historic Places; and that the Park is protected under the provisions of a public  
12 charitable Trust which precludes construction of municipal facilities or any other encumbrance of  
13 Trust lands. Although not disclosed in the MIS/DEIS, one of the 24 power sub-stations the size of a  
14 "small house" is planned to be constructed within Kapiolani Park Trust lands (see: In-Town BRT  
15 Map No. 14, dated July 24, 2000).  
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19 The MIS/DEIS states that according to the "Environmental Baseline Report" dated June, 1999,  
20 landscapes with the highest visual quality and character include Kapahulu Avenue between  
21 Kalakaua Avenue and Kubio Avenue (MIS/DEIS @ 3-52). However, the MIS/DEIS curiously  
22 omits the Diamond Head Special District when referring to special view opportunities in special  
23 districts that have a "distinctly unique character due to cultural and historical context". Pursuant to  
24 the City's Land Use Ordinance, significant viewplanes surrounding Diamond Head and historic  
25 Kapiolani Park are protected within the Diamond Head Special District. However, the D-EIS  
26 proceeds to ignore the special district zoning designation of the Diamond Head area as a historic,  
27 cultural and scenic District.  
28

29 Within this designated special district is situated the historic property of the Kapiolani Park Trust,  
30 on which a transit stop is planned adjacent to the Zoo parking lot. Curiously, this remains  
31 undefined in the MIS/DEIS, although a rapid transit station site is disclosed on photographic  
32 overviews distributed at the MIS/DEIS information meetings on October 2 and 5. Further, the  
33 MIS/DEIS discloses that the "area of potential effect" on historic resources is impacted by BRT  
34 station stops, transit centers, and new ramps where such facilities might be elevated.  
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36 The MIS/DEIS states: "Parklands: Use of the overflow parking lot at Aloha Stadium (relating to  
37 prior federal ownership of the land) would be coordinated with the Aloha Stadium Authority"  
38 (MIS/DEIS @ S-16). However, the D-EIS mentions nothing about the proposed transit stop at  
39 Kapiolani Park and the impact on the historic Kapiolani Park Trust lands, specifically the Zoo  
40 parking lot restricted solely for park use in Kapiolani Park under court order (see: S.P. No. 89-0015,  
41 Conclusions of Law and Order @ 12 and 13). The impact on the Zoo parking lot and surrounding  
42 area as proposed to service a rapid transit stop is not addressed in the MIS/DEIS.  
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1 Also of significant absence in the MIS/DEIS is the fact that Kapiolani Park was listed on the Hawaii  
2 State Register of Historic Places in 1992 and is eligible for the National Register, thus protected by  
3 federal historic preservation laws. The monkeypod trees within the Zoo parking lot on Kapahulu  
4 Avenue are an integral part of the historic landscape of Kapiolani Park, and living assets of the  
5 Kapiolani Park Trust. Collectively, they are a significant landscape feature along Kapahulu  
6 Avenue, a portion of which is also within Kapiolani Park Trust lands. Yet, the MIS/DEIS discloses  
7 that the monkeypod trees at this location are planned to be removed, relocated or cut back for rapid  
8 transit purposes (figure 5.7-1B), and the MIS/DEIS is silent on the significant negative impact this  
9 may have on the irreplaceable historic landscape and viewplanes of Kapiolani Park.  
10 Further, the MIS/DEIS suggests that there could be special paving at crosswalks, street lighting,  
11 banners, street furniture, and plantings along the entire corridor, which would "enforce the character  
12 of the area and sense of place." Kapiolani Park is a protected historic landscape, and the Zoo  
13 parking lot fronting Kapahulu Avenue is respectful with majestic Monkeypod trees. To add a  
14 cluttered carnival of banners, street furniture and decorative paving would compromise the historic  
15 character and integrity of the historic landscape along Kapahulu Avenue, and annihilate Kapiolani  
16 Park's enduring historic sense of place.  
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19 In addition, the MIS/DEIS states that the embedded electro-plate technology of the rapid transit  
20 system "requires substations every 1/2 mile (i.e., 24 buildings about the size of a small one-story  
21 house). They could be designed to blend in with the surrounding neighborhoods and placed  
22 underground where the water table permits, if necessary" (MIS/DEIS @ 5-38). Such a rapid transit  
23 electric substation is planned on Kapiolani Park Trust lands at the Zoo parking lot adjacent to a  
24 transit stop (see: Photographic overview #14, as distributed at the MIS/DEIS information meetings  
25 on October 2 and 5). This would not appear to have the ability to meet the "visual compatibility"  
26 assessment for Kapiolani Park's important visual resource, as the brackish water table is only inches  
27 below the sandy sub-surface layer. Ironically, the MIS/DEIS claims that this "offers an opportunity  
28 to enhance the visual quality of the streetscape..." (MIS/DEIS @ 5-39), and completely ignores  
29 Assessment of Effect on this historic resource on table 5.10-1.  
30

31 Nor would such a municipal utility facility as a power sub-station be in conformance with the  
32 Court's findings (see: SP No. 89-0015, City and County of Honolulu v. State Attorney General and  
33 Kapiolani Park Preservation Society). Notably, the Court order precludes use of Kapiolani Park  
34 Trust lands for municipal facilities, and provides for addition of adjacent lands to the Trust to  
35 compensate for ongoing municipal use of such lands for a pre-existing fire station, while continuing  
36 to retain such lands within the Trust.  
37

38 At a City Council presentation and public hearing on the MIS/DEIS on October 5, a TransHawaiian  
39 transportation representative recommended converting Jefferson School to a BRT terminus. In  
40 response, the City Councilman for the district and Kapiolani Park Trustee interjected a suggestion  
41 for such use on only that portion of the school site which is currently open space. However, much  
42 of this contemplated portion of Jefferson School along Kapahulu Avenue is also within the historic  
43 Kapiolani Park Trust boundary (see: Monsarrat Survey Map dated 1883). Prior to this, at a



1 Kapahulu community visioning group meeting on June 21, 2000, the same Kapiolani Park Trustee  
2 and City Councilman for the district suggested that the community "think large" and consider the  
3 Kapiolani Park Trust lands at the Zoo location and at Jefferson School as possible sites for a  
4 municipal parking lot and transit center location.  
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7 The significant impact of such suggestions, as well as the impact of the proposed transit stop on the  
8 Zoo parking lot set aside for park use only, and the impact on the surrounding community through  
9 which transit riders would commute to park at the Zoo parking lot, are not addressed in the  
10 MIS/DEIS. This supports the conclusion that the cumulative impact of the larger project has not  
11 been addressed, much less disclosed, in the MIS/DEIS.  
12

13 There is mounting concern that the in-town tram system is planned to run along a separated traffic  
14 lane on the makai side of Kalakaua Avenue, further impacting ancient Hawaiian burials at this  
15 location, which is also neither mentioned nor addressed in the MIS/DEIS. The MIS/DEIS  
16 generally states, "Should archaeological resources be encountered during construction, work would  
17 stop immediately and the State Historic Preservation Officer would be contacted" (MIS/DEIS @ S-  
18 16). However, the MIS/DEIS then specifically refers to potential disturbance on Middle Street and  
19 Kalia Road, but mysteriously does not mention Kalakaua Avenue (MIS/DEIS @ 5-66), where such  
20 disturbance has happened several times before in Waikiki, most recently when public works  
21 projects along Kalakaua Avenue unearthed and disturbed Hawaiian burials - causing great public  
22 outcry and controversy. An embedded electro-plate transit corridor along the same route will  
23 undoubtedly disturb several more *iwi kupuna*. Yet, the MIS/DEIS states further that, "An  
24 archaeological contingency procedure would be developed in the unlikely event that unanticipated  
25 resources are encountered during construction" (MIS/DEIS @ S-17).  
26

27 The Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board opposes construction of an  
28 in-town fixed and separated transit corridor loop around Waikiki, including along Kapahulu  
29 Avenue. a) that necessitates the construction of power substations and peripheral parking for its  
30 support within the Diamond Head Special District and/or within Kapiolani Park Trust lands as  
31 listed on the Hawaii State Register of Historic Places, and b) that is permanently embedded on the  
32 makai side of Kalakaua Avenue, impacting the one of Oahu's significant views, the Kalakaua  
33 Avenue/Waikiki Beach coastal viewplane, and disturbing ancient Hawaiian burials along the  
34 Kalakaua Avenue shoreline. By such omissions as the above, and with the cumulative impacts of  
35 such facilities on the Waikiki area and surrounding communities and parklands remaining  
36 undisclosed, the MIS/DEIS is rendered defective and deficient.  
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### VIEWPLANES and ESTABLISHED LANDSCAPES

1 There is serious concern that the in-town tram system is planned to run along a separated traffic lane  
2 on the makai side of Kalakaua Avenue, impacting the Kalakaua Avenue/Waikiki Beach coastal  
3 viewplane, one of Oahu's significant views. The MIS/DEIS states that according to the  
4 "Environmental Baseline Report" dated June, 1999, landscapes with the highest visual quality and  
5 character include the portions of Kalakaua Avenue along Waikiki Beach. In addition, the Kalakaua  
6 Avenue/Waikiki Beach coastal viewplane is listed as one of Oahu's significant views as identified  
7 on in the City's "Coastal View Study" of 1987. (MIS/DEIS @ 3-52). A high-capacity dual tram  
8 every four minutes and associated transit stops dedicated to the makai lane of Kalakaua Avenue  
9 would adversely impact the shoreline viewplane and "Hawaiian Sense of Place" along the length of  
10 Kuhio Beach and in front of the historic Moana Hotel. This would result in a misplaced and  
11 ultimately destructive endeavor, demonstrating that the "Hawaiian sense of place" continues to  
12 elude City planners.  
13

14 Further, there is significant community concern that a) the MIS/DEIS states that "The majority of  
15 trees potentially affected are the monkeypods along Kapiolani Boulevard from Pensacola Street to  
16 Isenberg Street" where they will be removed, relocated or cut back to make way for the transit  
17 corridor, b) that transit corridor exclusive median lanes will be constructed along the length of  
18 University Avenue, together with platforms and divisive curbs that bisect the main thoroughfare and  
19 divide the community and neighborhoods through which it runs, and which will necessitate the  
20 removal of the recently-planted Shower trees, and c) that historic monkeypod trees will be removed,  
21 replaced or cut back in the vicinity of Kapiolani Park (MIS/DEIS @ 5-56 and figure 5.7-1B). Yet,  
22 the MIS/DEIS is vague and unresponsive regarding the exact locations, and the size and value of  
23 these historic trees and landscapes.  
24

25 There is also serious concern that the MIS/DEIS states that "some landscaping would be lost  
26 fronting the Convention Center on the makai side of Kapiolani Boulevard in order to widen the  
27 Kapiolani/Kalakaua intersection" to make way for the in-town tram system. With the recently-  
28 planted lush landscape screening removed, this prominent street frontage would then be left with a  
29 huge concrete facade which was intended to be concealed, softened and cooled by landscaping.  
30

31 Thus, there is serious concern that the planned changes to the physical environment, including the  
32 removal of decades of beautification efforts that have generated established trees and landscaping,  
33 and the addition of fixed transit lanes bisecting and dividing neighborhoods, will contribute to a  
34 cumulative loss in the quality of life for the surrounding communities.  
35

36 The Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board opposes construction of an  
37 in-town separated high-capacity transit corridor a) along Kapiolani Boulevard, where monkeypods  
38 from Pensacola Street to Isenberg Street are slated to be removed, relocated or cut back to make  
39 way for the transit corridor, b) along University Avenue where a fixed two-way transit corridor is  
40 planned to be constructed in the street median, thus necessitating the removal of the recently-  
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1 Transportation Project, and supports the best efforts of the City and County of Honolulu to expedite  
2 and fulfill the commitment to expand and maintain the Transportation System Management  
3 program to ensure that it is efficient, cost-effective and reliable.  
4

1 planted Shower trees, c) within the Kapiolani/Kalakaua intersection on the makai side of Kapiolani  
2 Boulevard where the recently-planted and costly landscaping fronting the Convention Center would  
3 be lost to make way for the in-town transit lanes, and d) within the Diamond Head Special District  
4 and Kapiolani Park Trust lands where historic monkeypod trees are slated to be removed, replaced  
5 or cut back to make way for the in-town fixed transit line and ancillary facilities.  
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**CONCLUSION**

Environmental Impact Statements are required for proposed publicly-funded projects when a  
finding of significant impact is made, and are required to address the cumulative impact of  
the larger project, as has been reaffirmed by the Hawaii State Supreme Court.

Conclusively, public comments, questions and concerns emanating from the community sector  
indicate that the MIS/DEIS is a) premature, as the City is without the capability to represent  
defined technology and subsequently specific costs thereof, b) segmented, by not disclosing the  
cumulative impact of the larger project as required by federal and state environmental impact  
statement regulations, and c) incomplete, by neglecting to address the types of transit contemplated  
to access certain locations, the linkage to and types of transit centers and facilities at other locations,  
and how the components of the proposed plan correlate with the existing Primary Urban Center  
Development Plan and its 1999 proposed revisions, and d) inadequate, by not addressing increased  
congestion caused by converting existing traffic lanes into separate transit corridors to  
accommodate fixed transit lanes, and the necessary mitigation thereof.

In light of the above, the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board  
opposes any high-capacity transit corridor, peripheral facilities and ancillary infrastructure that will  
adversely or intrusively impact Waikiki shoreline viewplanes, historic sites and landscapes,  
parklands, internal traffic patterns, visitor center support services, surrounding communities and  
neighborhoods, and the "Hawaiian Sense of Place". We question the rationale behind promoting  
an in-town fixed rapid transit to replace more convenient and flexible circulator systems, and thus  
advocate full reconsideration of in-town fixed transit corridors and determination in the future  
where there can be more efficient and flexible use of time-proven technology. Honolulu has a  
nationally-recognized bus system, and the City administration must continue to maintain and  
maximize this resource to its fullest potential, including but not limited to flexible in-town  
circulators; express-bus, zipper-lane, and alternative-energy upgrades; and ridership incentives.

In conclusion, the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board rejects the  
proposed embedded transit system planned between Middle Street and Kapahulu Avenue, described  
in the MIS/DEIS as the in-town BRT Alternative, for the reasons stated and outlined above.  
Instead, the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board strongly recommends  
the flexible, modifiable bus transit alternative, described in the MIS/DEIS as the Transportation  
System Management (TSM) Alternative, as the Preferred Alternative for the Primary Corridor



# TRANSPORTATION COMMITTEE MEETING

November 14, 2000

## RESOLUTION 00-249

### SELECTION OF A LOCALLY PREFERRED ALTERNATIVE FOR THE PRIMARY CORRIDOR TRANSPORTATION PROJECT

We are pleased to inform you that we strongly support continuation and full implementation of the flexible and modifiable Transportation Service Management (TSM) Alternative to serve the entire Primary Corridor, including the Urban Honolulu segment between Middle Street and Kaimuki.

However, with respect to Bus Rapid Transit (BRT) Alternative, there appears to be sufficient reason to expect significant adverse in-own impacts on traffic patterns, business districts, neighborhoods, private transportation carriers, and surrounding communities from the magnitude of this proposed cumulative transportation project.

Thus, we find we can neither support nor recommend the proposed In-Town BRT Alternative for the purpose of the public decision-making process on this project.

Our concerns, questions and comments focus on the proposed BRT Alternative. Our specific concerns include, but are not limited to, the following:

- lack of correlation to pending Primary Urban Center development plan revisions;
- absence of information and location of impacts on registered historic sites, landscapes, parklands, and ancient burial sites;
- incomplete and questionable community involvement and consensus in recommending specific components, facilities, and routes for the BRT Alternative;
- absence of traffic testing for cumulative traffic impacts;
- public and private circulator transportation, service and delivery operations and traffic impacts;



- major infrastructure and utility impacts;
- absence of defined and proven technology and associated cumulative capital costs and operations subsidies;
- absence of ancillary facilities descriptions, localities, linkages and impacts on surrounding communities;
- compromised present quality of life and "Hawaiian Sense of Place", e.g. destruction and/or adverse impact to scenic viewplanes, historic landscapes, and Hawaiian burials to provide for embedded rapid transit infrastructure, utilities and facilities;
- incomplete expansion and improvement of the present Transportation Service Management program to its fullest potential, including the hub-and-spoke circulator system, express and articulated vehicles, dedicated freeway "zipper" lanes, and public and private ridership incentives, prior to any consideration of an embedded rapid transit alternative.

The Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board opposes such a high-capacity transit corridor, peripheral facilities and ancillary infrastructure that will adversely or intrusively impact Waikiki shoreline viewplanes, historic sites and landscapes, parklands, informal traffic patterns, visitor center support services, non-subsidized private transportation carriers, surrounding communities and neighborhoods, and the "Hawaiian Sense of Place".

We question the rationale behind promoting in-town fixed rapid transit to replace more convenient and flexible circulator systems. Honolulu has a nationally-recognized bus system, and the City administration must continue to maintain and maximize this resource to its fullest potential, including but not limited to flexible in-town circulators; express-bus, zipper-lane, and alternative-energy upgrades; and ridership incentives.

In conclusion, the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board rejects the proposed embedded transit system planned between Middle Street and Kapahulu Avenue. Instead, we strongly advocate the TSM Alternative, as the Preferred Alternative for the Primary Corridor Transportation Project, and support the best efforts of the City expedite and fulfill your commitment to expand and maintain the TSM program to ensure that it is efficient, cost-effective and reliable.

A copy of the Board's Resolution to this effect is provided for your review.

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TPD11/00-05452R  
TPD11/00-05591R

November 13, 2002

Ms. Karen Ah Mui, Chairperson  
Diamond Head/Kapahulu/SI Louis Heights  
Neighborhood Board No. 5  
Neighborhood Commission  
City Hall, Room 400  
Honolulu, Hawaii 96813

Dear Ms. Ah Mui:

Subject: Primary Corridor Transportation Project

This responds to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS). We are responding to your October 28, 2000 testimony at the Transportation Committee meeting, your November 2, 2000 resolution supporting the TSM Alternative and opposing the In-Town BRT, November 6, 2000 letter, and your November 14, 2000 Resolution on Selection of a Locally Preferred Alternative.

1. At a Special Meeting scheduled for November 2, the committee will be presenting the following concerns and questions to the full Board, with the recommendation to reject the In-Town BRT portion of the proposed plan.

Response: Comment noted. It states the commenter's preference for a Locally Preferred Alternative (LPA).

2. Transportation planning is dependent on land use planning, yet the Primary Urban Center Development Plan revision has not been reviewed, approved, or adopted. Why is the transportation plan being placed ahead of the PUC Development Plan?

Response: Since there is no indication of when the City Council will adopt the updated Primary Urban Center Development Plan, the Primary Corridor Transportation Project environmental process is continuing. City Council adoption of the updated Primary Urban Center Development Plan is not needed to complete the environmental review process for the Primary Corridor Transportation Project. For your information, federal-aid transportation projects on Oahu, such as the Primary Corridor Transportation Project, are identified through a planning process coordinated by the Oahu Metropolitan Planning Organization. The most recent Oahu transportation plan, called the Transportation for Oahu Plan (TOP) 2025 (April 6, 2001), identifies the proposed project.

3. Why is the transit corridor being proposed for Kapihōlehū Boulevard, along which are large, undeveloped parcels, when there are more people on King Street?

Ms. Karen Ah Mui  
Page 2  
November 13, 2002

Response: Along with serving existing transit needs, one of the other project goals is to help shape growth in the corridor. Large, undeveloped parcels along Kapihōlehū Boulevard present opportunities to encourage transit-oriented development at these sites.

4. In addition, the permanent BRT system proposed is planned to loop around Wabūbi. Ironically, this displaces the local circulator with more frequent and convenient stops. This also jeopardizes the survival of local carriers who service Wabūbi successfully and without subsidy, as disclosed in Appendix B of the 1999 Joint Waikiki Task Force Report.

Response: Today, public transit service is only provided on Kuhio Avenue (both directions). The BRT will provide high frequency service on Keolu and Kuhio Avenues, thus increasing the area directly served by public transit. Based on the analysis of the potential impacts on private transportation providers as discussed in Section 5.1.5 of the FEIS, the private transportation providers will not be significantly adversely affected by the Refined LPA since they serve different travel markets. Even with the BRT, private operators would still be needed to serve the tourist travel market.

The BRT routings, stop locations and other features are designed to serve trips by Oahu residents when going to-and-from home, work, school, shopping and other purposes. It is not designed to serve the tourist market as are the private bus operations in Honolulu. Unlike the private sector buses, the BRT will not pick passengers up at their hotels and take them on various scenic tours. It will not take them to-and-from the Airport. It will not take them to-and-from their hotels and the Convention Center. It will not pick them up at the cruise ship terminal and carry them and their bags directly to their hotels. And unlike the private shuttles it is not designed to operate in a loop that only goes between the Waikiki hotels and the various tourist sites of interest.

Some tourists may use BRT because it does serve some of the same destinations that the tourists want to go to. But the BRT serves these places primarily because they are also major employment sites or sites that attract local residents, such as shopping centers or restaurants. The tourists expected to use the public transit system with the BRT is forecast to be no greater proportionally than today (i.e., around six to eight percent of total daily boardings).

5. Why would the City entertain the notion to intrusively impact internal traffic patterns and visitor center support services with a high-capacity transit corridor in Waikiki?

Response: The BRT is meant to complement the local bus service in Waikiki and elsewhere in the Primary Transportation Corridor by providing a faster more reliable service for riders by offering limited stop operations in bus priority lanes. Workers and residents in Waikiki are among those who would benefit most from the Refined LPA. Rather than being intrusive, the BRT Alternative has been designed to enhance and support the tourist-oriented urban character of Wabūbi.

6. The DEIS states that candidate technologies are not yet fully proven, so a decision on the type of transit technology need not be made at this point. If such a decision cannot be made, why is the City moving on a fast track towards approval of a \$1 Billion System, including equipment replacement -- all to be paid by the taxpayer.

Response: As described in FEIS Chapter 1, there is sufficient present travel demand to justify the Refined LPA now. Not only is the system justified by present needs, but the need for the benefits

of the system would become even more urgent as growth occurs. Therefore, as the executive agency charged with providing and maintaining adequate transportation infrastructure, it would be prudent to not pursue implementing this project.

Transit technology is ever changing. However, DTS cannot wait for the perfect system. Technology options for the In-Town BRT are not yet considered "proven in regular revenue service". In the final design phase of project development, DTS would define the service-proven requirements for this project and then assess the probability of each technology meeting the requirements.

DTS would establish its own safety certification process following guidelines and standards that have been found acceptable for similar transit systems and equipment. This safety certification process would comply with a System Safety Program Plan (SSPP) written specifically for each technology. The SSPP would include independent reviews of the designs, manufacturing processes, installation procedures and specific application for Honolulu; hazard analyses; tests; and also include reviews of safety analyses carried out by or for the supplier/manufacturer.

Certification of a technology would involve two aspects: certification of the "product" and certification of the "application". Certification of the product would address basic design, operation, maintenance, and interface with associated activities. Certification of the application would address specific design and implementation of the technology in Honolulu, including operations and maintenance.

The City would also establish an evaluation program used to select the final technology. The evaluation program is expected to comprise the following steps:

- Define the technology performance requirements for the In-Town BRT system.
- Notify suppliers of candidate technologies of the City's desire to select a final technology, the proposed technical requirements, and the time frame for selection.
- Meet with interested suppliers, both in a group and individually, to discuss the details of the City's requirements and time frame.
- Perform an independent evaluation of the development status of candidate technologies.
- Conduct technology demonstrations on Oahu.
- Recommend final technology.

The current schedule, which does not require selecting the final technology until spring 2008 allows manufacturers of candidate technologies to further develop and define their products, and for the City to gain further understanding of these technologies and the impacts the introduction of one of the technologies would have in the proposed application in Honolulu.

The City has identified potential risks of selecting and implementing an emerging technology for the In-Town BRT. The City has also developed strategies for minimizing these risks. A few of the ways the City could help minimize risks are:

- Provide the incentive of Honolulu's project in an effort to induce product development by manufacturers. This should include the promotion of the In-Town BRT project to the bus industry, including details of the performance and technical requirements. Working with the industry would allow the City to monitor and influence the development of the candidate technologies and have a greater understanding of each technology.
- Monitor/Participate in current Demonstration Programs to gain a greater knowledge of how other transit agencies are implementing emerging technologies and how lessons learned can be applied to Honolulu's program.

- Develop contractual requirements that address what happens if the selected technology does not perform as specified.
- Work with industry, regulators, and local public officials to ensure any necessary code revisions or exemptions are in place.

Even without finalizing the technology for the In-Town BRT, the FEIS is still valid since the impacts and mitigation measures identified are for the technology with the greatest level of impacts in each environmental discipline. For example, the embedded plate system would have greater land use impacts than hybrid technology, because embedded plate systems require electric power substations and more roadway reconstruction.

7. *What services and capital improvements will be necessary to sacrifice so this system can be paid for without raising taxes?*

**Response:** One of the assumptions made in developing the cash flow plan in the FEIS is that the City will need to phase in the project as money is available from different federal and local sources. The cash flow plan made sure that there was significant capacity for other large projects through general bonds. In the FEIS, the amount of GO bonds needed on an annual basis was reduced, in part to reduce the impact of the BRT project on other major capital needs. None of the existing projects would be deferred, since the financing for these has already been accounted for. These are choices that would need to be made by City officials, just as they make financial decisions for any large capital project.

8. *No physical traffic testing has been conducted to demonstrate the impact of the proposed separated lanes for the In-Town BRT on Kapiolani Boulevard, University Avenue, Kalanikaʻe Avenue, Kapihulu Avenue and Kuhio Avenues, or to show that lane dedication will result in less traffic congestion. In fact, current conditions demonstrate that when lanes are blocked or closed on main thoroughfares, traffic migrates into peripheral areas and neighborhoods to circumvent the congestion.*

**Response:** A test of closing a lane is not a test of what will happen with the BRT, it is only a test of what happens when a lane is closed which is something everyone knows the consequence of from when lanes are temporarily closed during utility construction.

As is pointed out in Chapter 4 of the FEIS, over time there will be enough people diverted from autos to transit to offset the impact of converting lanes for priority use by buses. This diversion from autos will only happen once it is clear that the BRT installation is a permanent improvement, not part of some test.

What is proposed with the first In-Town BRT branch between Iwilei and Waikiki will be a good test of the ability of BRT to attract new riders and the impacts of converting lanes in selected locations.

9. *There are no physical traffic tests in the Kapihulu/Kalanikaʻe corridor to show that traffic congestion will not increase exponentially with the re-allocation of existing lanes to dedicated high-occupancy lanes, yet this plan is proposed to be permanently fixed within our main traffic arteries.*

**Response:** See response to Comment #8 and traffic analyses in this FEIS, Chapter 4.

10. *Peripheral parking locations to support the proposed In-Town BRT system from Kapiolani to Kapihulu are undiscussed in the DEIS. What impact will this have on the surrounding communities?*

**Response:** New parking locations that complement the In-Town BRT will be located at the Middle Street Transit Center and the Iwalei Transit Center. These are being developed as independent projects from the Refined LPA.

11. The BRT Waikiki terminus is proposed for Kapihulu Avenue, yet the only available parking is at the Zoo parking lot which is on Trust land and specific to park use. However, the 1999 Joint Waikiki Task Force Report recommends such facilities be placed at the Kapihulu Library or the base yard at the Ala Wai golf course.

**Response:** The BRT would not "terminate" anywhere in Waikiki. The BRT route consists of a one-way loop using Kalakaua, Kapihulu and Kuhio Avenues. It is not intended that the zoo parking lot be used as parking for BRT patrons. The project does not propose any sites for peripheral parking in Waikiki. Therefore, there is no need to identify "alternate" sites.

12. A "Kaimuki Transit Center" is sited with the Iwalei Transit Center and the Middle Street Transit Center in the DEIS, which states that "connections...to the regional and in-town BRT systems would occur at transit centers." However, the DEIS neither describes nor illustrates any linkage to the Kaimuki Transit Center which is now known to be planned for Waialae Avenue.

**Response:** The Kaimuki Transfer Point is moving forward as a separate project and a separate environmental analysis will be conducted.

13. In addition, the proposed Primary Urban Center Development Plan revision issued in 1999 refers to "high capacity transit corridors" proposed for Kapihulu Avenue (Ala Wai golf course/park), Dale Street, and Waialae Avenue. The PUC Development Plan revision also proposes "urban villages" and "village lots" on consolidated lots along these routes. Such consolidated development accessed by high capacity transit corridors also is proposed for McCully-Hoani along King Street, Dale Street, the Sheridan area, and for Bingham Tread. Yet, all of the above linkages are virtually undisclosed and remain unaddressed in the DEIS.

**Response:** As described in Section 5.1.3 of the FEIS, "Consistency with Land Use Plans", the Refined LPA was evaluated as being "highly consistent" with the policies and guidelines of the Primary Urban Center Development Plan updates. DTS will continue coordinating with the DPP throughout project development to insure that the project remains consistent with the plan updates. The In-Town BRT has been designed to support current land uses and future land use patterns, particularly in vacant and underutilized parcels in Kakaako, Iwalei, and near Ala Moana Center and the Convention Center. These are the locations where development is likely to occur with or without the PCTP. Because of this, the Refined LPA has been evaluated in the FEIS as being consistent with the Public Review Draft of the PUC DP (May 2002), as well as the current PUC DP adopted in 1990.

14. The DEIS is deficient by neglecting to disclose that Kapihulu Park is within the Diamond Head Special District, is sited on the Hawaii State Register of Historic Places, and is governed under the protective provisions of a public charitable trust which precludes construction of municipal facilities and any other encumbrance of Trust lands. We have learned through the DEIS and a series of public meetings that a total of 24 power substations for the proposed system will be placed every half mile. These are described as being the site of a small house, and one is planned to be placed in Kapihulu Park, as shown on Transportation Map 14 dated July 24.

**Response:** As a result of comments received regarding the substation locations and further project refinements since the MIS/DEIS was released, the substation originally shown in the Kapihulu Park area has been relocated to a location on Kuhio Avenue. (See FEIS Appendix B.) It should be noted that the substations would only be constructed if the embedded plate technology is selected.

15. The DEIS states that "some landscaping would be lost from the Convention Center on the makai side of Kapihulu Boulevard in order to widen the Kapihulu/Kalakaua intersection to make way for the BRT. With the recently-planted lush landscape screening removed, would we then be left with a huge concrete facade which was intended to be concealed by landscaping?"

**Response:** Minimal landscaping would need to be removed. Whatever was removed would be replaced with similar types of trees in the same general location.

16. The BRT is planned to run along a separated traffic lane on the makai side of Kalakaua Avenue. The Kalakaua Avenue/Waikiki Beach coastal viewplane is sited as one of Oahu's significant views identified in the City's Coastal View Study. Thus the proposed electro-plate tram corridor appears to be misplaced and counter to the "Hawaiian Sense of Place" that continues to elude City planners.

**Response:** The physical improvements that would be visible along Kalakaua Avenue would be minimal, consisting of a single transit station along the street on the makai side. It is felt that the station can contribute to the amenities that are presently there. The station is not thought of as a wall or building and would be designed to be airy and open. The transit station would be designed as an open, welcoming structure, well landscaped and integrated into the existing promenade.

17. The BRT is planned to run along a separated traffic lane on the makai side of Kalakaua Avenue. The Kalakaua Avenue/Waikiki Beach coastal viewplane is sited as one of Oahu's significant views identified in the City's Coastal View Study. Thus the proposed electro-plate tram corridor appears to be misplaced and counter to the "Hawaiian Sense of Place" that continues to elude City planners.

**Response:** See response to comment #16.

18. Kalakaua Avenue is also the location of ancient Hawaiian burials. Curiously, this is neither mentioned nor addressed in the DEIS, which refers only to burial sites along Middle Street and Kalia Road.

**Response:** Section 3.10.2 of the MIS/DEIS under "Archaeological Resources" states, "the sandy soil conditions of Fort DeRussy and Kalakaua Avenue make the discovery of burials in these locations not unexpected." The FEIS includes the archaeological survey results.

19. Why would the City entertain the notion to intrusively impact internal traffic patterns and visitor center support services with a high-capacity transit corridor in Waikiki? Would not this transit experiment be better suited and better placed in the more open areas of Kapihulu and Central Oahu - where there could be more efficient use of time-proven technology and more time saved for more people over longer distances to the downtown destination?

**Response:** The Refined LPA includes a Regional BRT component and an In-Town BRT component. The Regional BRT would serve Kapiolani and Central Oahu. The FEIS Chapter 4 presents the traffic and transportation effects resulting from implementing the Refined LPA. The Refined LPA would not affect visitor center support services.

**20. BE IT RESOLVED,** that the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board requests that further consideration of the MIS/DEIS be delayed until the Primary Urban Center Development Plan revision has been publicly reviewed, approved and adopted - including any conceptual "urban villages" and "village tracts" proposed to be developed on consolidated lots and accessed by "high capacity transit corridors" along Waikele Avenue, Dale Street, and Kapahulu Avenue (where the Ala Wai Golf Course is now being planned to become a major regional park attraction), as well as in McCully-Moanalua along Dale Street, King Street, the Sheridan area, and within Bingham Tract -- since transportation planning is integrally related to land use planning; and

**Response:** There is no indication of when the updated Primary Urban Center Development Plan (PUC DP) will be adopted by the City Council. The environmental review process of the Primary Corridor Transportation Project (PCTP) cannot be delayed pending this outcome. The In-Town BRT has been designed to support current land uses and future land use patterns, particularly in vacant and underutilized parcels in Kakaako, Miel, and near Ala Moana Center and the Convention Center. These are the locations where development is likely to occur with or without the PCTP. Because of this, the Refined LPA has been evaluated in the FEIS as being consistent with the Public Review Draft of the PUC DP (May 2002), as well as the current PUC DP adopted in 1990.

**21. BE IT FURTHER RESOLVED** that the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board requests that further consideration of the MIS/DEIS be delayed until all segments of the larger project are fully disclosed and described in the MIS/DEIS, including peripheral parking locations contiguous to Waikiki and linkages to outlying transit centers at undisclosed locations, such as the "Kaimuki Transit Center" mentioned in the MIS/DEIS; and

**Response:** The FEIS fully discloses the benefits and effects of implementing the Refined LPA. There are no peripheral parking locations or transit centers planned as part of the PCTP beyond those identified as park-and-ride, transit centers or transfer points in the FEIS.

**22. BE IT FURTHER RESOLVED,** that the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board opposes closure of vital vehicular traffic lanes and re-allocation of such to any separated high-occupancy vehicle transit lanes from Ward Avenue to Kapahulu Avenue until physical traffic testing is conducted over a period of several months, including along Kapiolani Boulevard, University Avenue, Kalakaua Avenue, Kapahulu Avenue and Kulo Avenues, to demonstrate successful mitigation of the expected exponential traffic overflow impact on surrounding communities and neighborhoods; and

**Response:** See response to comment #8.

**23. BE IT FURTHER RESOLVED,** that the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board opposes construction of an in-town fixed and separated transit corridor loop around Waikiki, including along Kapahulu Avenue, that disrupts the transport and delivery of goods and services, that displaces local circulator carriers who provide frequent and convenient stops, that jeopardizes the survival of such carriers who service Waikiki successfully and without subsidy, and that impacts transport and delivery routes for goods and services that are Waikiki's lifeline to survival as a major visitor destination; and

**Response:** Today, public transit service is only provided on Kulo Avenue (both directions). The BRT will provide high frequency service on Kalakaua and Kulo Avenues, thus increasing the area directly served by public transit. Based on the analysis of the potential impacts on private transportation providers as discussed in Section 5.1.5 of the FEIS, the private transportation providers will not be significantly adversely affected by the Refined LPA since they serve different travel markets. Even with the BRT, private operators will still be needed to serve the tourists' travel market.

The BRT routings, stop locations and other features are designed to serve trips by Oahu residents when going to-and-from home, work, school, shopping and other purposes. It is not designed to serve the tourists market as are the private bus operations in Honolulu. Unlike the private sector buses, the BRT will not pick passengers up at their hotels and take them on various scenic tours. It will not take them to-and-from the Airport. It will not take them to-and-from their hotels and the Convention Center. It will not pick them up at the cruise ship terminal and carry them and their bags directly to their hotels. And unlike the private shuttles it is not designed to operate in a loop that only goes between the Waikiki hotels and the various tourist sites of interest.

Some tourists may use BRT because it does serve some of the same destinations that the tourists want to go to. But the BRT serves these places because they are also major employment sites or sites that attract local residents, such as shopping centers or restaurants. The tourists expected to use the public transit system with the BRT is forecast to be no greater proportionally than today (i.e., less than 10-15 percent of total daily boardings).

The BRT is meant to complement the local bus service in Waikiki and elsewhere in the Primary Transportation Corridor by providing a faster more reliable service for riders by offering limited stop operations in bus priority lanes. Workers and residents in Waikiki are among those who would benefit most from the Refined LPA. Rather than being intrusive, the BRT System has been designed to enhance and support the tourist-oriented urban character of Waikiki. There will be a 50 percent reduction in the number of buses on Kulo Avenue and a 25 percent reduction of buses overall in Waikiki with the Refined LPA. This will make for a more pedestrian friendly environment not a more intrusive one.

As far as the affects to private tour vehicles and delivery vehicles, the Kalakaua/Kulo loop maintains auto access as well as passenger and freight loading zones on Kalakaua and Kulo Avenues. Private buses and trolleys will be able to share the semi-exclusive lanes in Waikiki with the BRT and local buses. This will be a substantial benefit for them. Freight carriers will be able to use the BRT shared lanes during legal delivery hours on Kalakaua Avenue (10 P.M. to 9 A.M.) and Kulo Avenue (10 P.M. to 7:30 A.M.) so that the BRT would simply pass around a stopped loading truck by using the adjacent traffic lane. The impacts of the Refined LPA on traffic congestion in Waikiki are shown in Tables 4.3-11 to 4.3-13 of the FEIS.

**24. BE IT FURTHER RESOLVED,** that the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board opposes construction of an in-town fixed and separated transit corridor loop around Waikiki, including along Kapahulu Avenue, a) that necessitates the construction of power substations and peripheral parking for its support within the Diamond Head Special District and/or within Kapiolani Park Trust lands as listed on the Hawaii State Register of Historic Places, and b) that is permanently embedded on the makai side of Kalakaua Avenue, impacting the one of Oahu's significant views, the Kalakaua Avenue/Waikiki Beach coastal viewplane, and disturbing ancient Hawaiian burials along the Kalakaua Avenue shoreline; and

**Response:** The proposed In-Town BRT alignment in Waikiki would not traverse Kapiolani Park, including Honolulu Zoo, or the Diamond Head Special District. Although the easternmost section of the alignment would be along Kapiolani Avenue, which is just outside the park and special district, it would be consistent with the Special District's land use objectives. In addition, as a result of the comments received regarding traction power substation locations and further project refinements since the MISDEIS was distributed, the traction power supply station originally shown in the Kapiolani Park area has been relocated to a site along Kūhio Avenue. It should also be noted that substations would only be constructed if the embedded plate technology is selected.

Regarding coastal view planes, the system's embedded plate technology would not affect the coastal view planes since it is flush with the surface of the street.

**25. BE IT FURTHER RESOLVED,** that the Diamond Head/Kapahu/St. Louis Heights Neighborhood Board opposes construction of an in-town road and separated transit corridor *a) along Kapiolani Boulevard where the MISDEIS states that, "The majority of trees potentially affected are the monkeypods along Kapiolani Boulevard from Pensacola Street to Iserberg Street" where they will be removed, relocated or cut back to make way for the transit corridor, b) along University Avenue where a fixed two-way transit corridor is planned to be constructed in the street median, thus necessitating the removal of the recently-planted Shower trees, c) within the Kapiolani/Kalaheua intersection on the makai side of Kapiolani Boulevard where the MISDEIS states that the recently-planted costly landscaping fronting the Convention Center would be lost to make way for the BRT, and d) within the Diamond Head Special District and Kapiolani Park Trust lands where the MISDEIS indicates historic monkeypod trees will be removed, replaced or cut back; and*

**Response:** Project planning has involved careful consideration of the trees along the In-Town BRT alignment that may be adversely affected. Where possible, project designs have attempted to avoid trees. However, in some areas, namely on portions of Dillingham Boulevard, Kapiolani Boulevard, University Avenue, Saratoga Road, and Kalia Road in Waikiki, some trees will need to be set back slightly, relocated or removed and replaced to allow for necessary road widening. Trees that will be moved back from the existing curb or relocated will be pruned for replanting. Their canopies are expected to grow back within one year, with full recovery in three to five years. In the event that some larger trees cannot be successfully moved back, they will be replaced with smaller trees of the same species.

**26. BE IT FURTHER RESOLVED,** that the Diamond Head/Kapahu/St. Louis Heights Neighborhood Board requests delay of an in-town separated high-occupancy vehicle lanes along Kapiolani Boulevard, University Avenue, Kalaheua Avenue, Kapahu Avenue and Kūhio Avenues until *a) candidate technologies for the proposed in-town system are fully proven and a decision on the type of transit technology can be made, b) advancing state-of-the-art technology can ensure a reliable, economic and efficient transportation system with more flexible operations, and c) until the City and County of Honolulu can demonstrate that the cost to develop such a system will ensure that there will be neither an increase in local taxes nor sacrificing of City services, repairs, operations, improvements, or any other necessary day-to-day functions of the City, no matter whether they are budgeted and funded under capital improvements or under operations; and*

**Response:** As described in FEIS Chapter 1, there is sufficient present travel demand to justify the Refined LPA now. Not only is the system justified by present needs, but the need for the benefits of the system would become even more urgent as growth occurs. Therefore, as the executive agency charged with providing and maintaining adequate transportation infrastructure, it would be imprudent to not pursue implementing this project.

Transit technology is ever changing. However, DTS cannot wait for the perfect system. Some of the technology options for the In-Town BRT are not yet considered "proven in regular revenue service". The City has elected to proceed with hybrid-electric buses during the initial stage of the In-Town BRT operations through 2011. In the subsequent phase of project development, DTS will define the service-proven requirements that each technology manufacturer will need to meet in order to be selected. DTS will also establish its own safety certification process following guidelines and standards that have been found acceptable for similar transit systems and equipment. This safety certification process will comply with a System Safety Program Plan (SSPP) written specifically for each technology. The SSPP is expected to include independent reviews of the designs, manufacturing processes, installation procedures and specific application for Honolulu; hazard analyses; tests; and also include reviews of safety analyses carried out by or for the supplier/manufacturer.

Certification of a technology will involve two aspects: certification of the "product" and certification of the "application". Certification of the product would address basic design, operation, maintenance, and interface with associated activities. Certification of the application would address specific design and implementation of the technology in Honolulu, including operations and maintenance.

The current schedule, which does not require selecting the final technology until 2008 allows manufacturers of candidate technologies to further develop and refine their products, and for the City to gain further understanding of these technologies and the impacts the introduction of one of the technologies would have in the proposed application in Honolulu.

The proposed financing plan will not increase local taxes or sacrifice existing City services, repairs, operations or improvements or any other day to day functions of the City.

**27. BE IT FURTHER RESOLVED,** that the Diamond Head/Kapahu/St. Louis Heights Neighborhood Board opposes any high-capacity transit corridor, peripheral facilities and ancillary infrastructure that will adversely or *invasively impact Waikiki shoreline viewplanes, historic sites and landscapes, parklands, informal traffic patterns, visitor center support services, surrounding communities and neighborhoods, and the "Hawaiian Sense of Place"; and*

**Response:** The Refined LPA will not affect viewplanes or visitor center support services. Transit stations and substations will be designed collaboratively with the surrounding communities. Stations can be open and contextual; substations can be placed and designed so that they are unobtrusive, and integrated with the surrounding context. Community, neighborhood, historic, parklands, and traffic effects are addressed in the FEIS.

**28. BE IT FURTHER RESOLVED,** that the Diamond Head/Kapahu/St. Louis Heights Neighborhood Board advocates full reconsideration of planning high-capacity transit corridors from Ward Avenue to Kapiolani Avenue and *determination in the future where there could be more efficient and flexible use of time-proven technology with more time saved for more people over longer distances to the downtown destination; and*

**Response:** Alternatives are addressed in FEIS, Chapter 2. A full consideration of options was performed. Two candidate technologies are being considered: the Embedded Plate Technology (EPT) and the Hybrid-Electric Propulsion System. Both are state-of-the-art technologies. Although the EPT technology is currently not proven in revenue service, a decision on the final



technology does not need to be made until 2008. In the interim hybrid-electric buses will be deployed. The final technology chosen will meet the City's certification, and constitute a reliable, economic, and efficient transportation system with flexible operations.

See response to comment #28.

29. **BE IT FURTHER RESOLVED**, that the Diamond Head/Kapahulu/SI, Louis Heights Neighborhood Board rejects the "Bus Rapid Transit" (BRT) Alternative, a fixed grade-level separated transit lane system proposed for the area inclusively between Middle Street and Kapahulu Avenue, and specifically along Kapiolani Boulevard, University Avenue, Kalanika Avenue, Kapahulu Avenue, and Kulia Avenue, for the reasons stated and outlined above; and

**Response:** Comment noted. It is a statement of opinion.

30. **BE IT FURTHER RESOLVED** that the Diamond Head/Kapahulu/SI, Louis Heights Neighborhood Board strongly recommends the Transportation System Management (TSM) Alternative, a flexible and modifiable bus transit system, as the Preferred Alternative for the Primary Corridor Transportation Project, and supports the best efforts of the City and County of Honolulu to fulfill the commitment to expand and upgrade Honolulu's present bus transportation to a (sic) fullest potential and to ensure that is efficient, cost-effective and reliable....

**Response:** Comment noted. It states the commenter's preference for a LPA.

31. We are pleased to inform you that we strongly support continuation and full implementation of the flexible and modifiable Transportation System Management (TSM) Alternative to serve the entire Primary Corridor, including the urban Honolulu segment between Middle Street and Kaimuki.

**Response:** Comment noted. It states the commenter's preference for an LPA.

32. However, with respect to Bus Rapid Transit (BRT) Alternative, there appears to be sufficient reason to expect significant adverse in-Town impacts from the magnitude of this proposed cumulative transportation project on traffic patterns, business districts, neighborhoods, private transportation carriers, and surrounding communities.

**Response:** DTS has been and will continue to work with the communities in the corridor to minimize and mitigate potential impacts of the project. The FEIS Chapters 4 and 5 disclose the benefits and impacts associated with implementing the Refined LPA. These chapters include proposed mitigation measures.

33. Thus, we find we can neither support nor recommend the proposed In-Town BRT Alternative for the purpose of the public decision-making process on this project. For the purpose of this response, you will find that our concerns, questions and comments focus on the proposed BRT Alternative.

**Response:** Comment noted. It states the commenter's preferences.

34. Lack of correlation to pending Primary Urban Center development plan revisions.

**Response:** See response to comment #20.

35. Absence of information and location of impacts on registered historic sites, landscapes, parklands, and ancient burial sites.

**Response:** Historic properties (historic and archaeological sites), viewplanes (landscapes) and parklands at or near the project area are identified and impacts to these resources discussed in Chapters 3 and 5 of the FEIS, respectively.

36. Incomplete and questionable community involvement and consensus in recommending specific components, facilities, and routes for the BRT Alternative.

**Response:** The Primary Corridor Transportation Project (PCTP) is the result of extensive public involvement. Public involvement began in 1998, at the very beginning of the planning process, and continues today. Input from the public was critical in developing and evaluating alternative transportation solutions. The development and refinement of the three alternatives discussed in the MIS/DEIS Chapter 2 was the result of public input.

In addition to four rounds of Oahu Trans 2K public workshops attended by a total of 1,250 individuals, meetings were held with more than 100 governmental agencies, elected officials, businesses, and business, community and civic organizations. The public also had the opportunity to provide input on the various alternatives at a series of four City Council Transportation Committee Meetings prior to selection of the Locally Preferred Alternative (LPA). The City Council selected the Locally Preferred Alternative (LPA) on November 26, 2000.

The public was given an opportunity to comment on the Environmental Impact Statement Preparation Notice (EISP/N) and the Notice of Intent to Prepare an EIS (NOI).

The public provided comments on the MIS/DEIS from September 8 to November 30, 2000. These comments have now been addressed and the FEIS will be broadly announced.

After the LPA was selected, the DTS continued public involvement activities by forming six Working Groups in geographic sub areas along the primary transportation corridor to further refine the BRT alignment and design features.

Even after the NEPA process is concluded and the Record of Decision (ROD) has been issued, public involvement will continue in many areas, such as design and construction of transit centers, transit stops, joint development, streetscapes, landscaping, street tree master plan, station location and design studies, aesthetic design of vehicles, ITS and particulars of the ticketing system.

37. Absence of traffic testing for cumulative traffic impacts.

**Response:** See response to comment #22.

38. Public and private circulator transportation, service and delivery operations and traffic impacts.

**Response:** See response to comment #23.

39. Major infrastructure and utility impacts.

**Response:** In Waikiki the BRT will be utilizing existing roadways and there will be no major infrastructure or utility impacts except for temporary impacts during construction.

40. Absence of defined and proven technology and associated cumulative capital costs and operation subsidies.

**Response:** See response to comment #26.

41. Absence of ancillary facilities descriptions, locations, linkages and impacts on surrounding communities.

**Response:** The FEIS includes information such as descriptions, locations, linkages and impacts of ancillary facilities such as transit centers and traction power supply stations in Chapters 2, 3, 4, and 5.

42. Compromised present quality of life and "Hawaiian Sense of Place", e.g. destruction and/or adverse impact to scenic viewplanes and landscapes to provide for embedded rapid transit infrastructure, utilities and facilities.

**Response:** The Refined LPA will not negatively affect viewplanes, landscapes or compromise the quality of life and "Hawaiian Sense of Place". Transit stations and substations will be designed collaboratively with the surrounding communities. Stations can be open and contextual; the substations can be placed and designed so that it is unobtrusive, and integrated with the surrounding context.

43. Incomplete expansion and improvement of the present Transportation Service Management program to its fullest potential, including the hub-and-spoke circular system, express and articulated vehicles, dedicated freeway "zipper" lanes, and public and private partnership incentives, prior to consideration of an embedded rapid transit alternative.

**Response:** The Refined LPA described in the MISDEIS and FEIS does indeed include implementing a hub-and-spoke bus network including circular routes, use of express and limited stop services, articulated vehicles, use of the existing dedicated "zipper" lane, and extension of this lane. The Refined LPA also includes Transportation Demand Management (TDM) measures to reduce or shift travel times of private automobiles.

44. Therefore, based on the information provided for the purpose of the public decision-making process on this project, by strong consensus we have elected to reject the In-Town BRT Alternative.

**Response:** Comment noted. It states the commenter's preference for a LPA.

45. A significant point that has been repeatedly stated by representatives of the interested and affected community is that the proposed In-Town transit plan is being quickly placed ahead of the 1999 Primary Urban Center Development Plan revision, even though transportation planning decisions depend upon existing land uses and land use planning in the urbanized Honolulu area. Although some may emphasize that subsidized rapid transit drives development, thus benefiting private investors and landowners at the expense of the Honolulu taxpayer, established land uses demand that transportation planning must follow adopted development plan guidelines.

**Response:** There is no indication of when the updated Primary Urban Center Development Plan (PUC DP) will be adopted by the City Council. The environmental review process of the Primary Corridor Transportation Project (PCTP) cannot be delayed pending this outcome. The In-Town BRT has been designed to support current land uses and future land use patterns, particularly in vacant and underutilized parcels in Kakaako, Waikiki, and near Ala Moana Center and the Convention Center. These are the locations where development is likely to occur with or without the PCTP. Because of this, the Refined LPA has been evaluated in the FEIS as being consistent with the Public Review Draft of the PUC DP (May 2002), as well as the current PUC DP adopted in 1999.

46. The proposed Development Plan draft revision also promoted the concept of "high capacity transit corridors" on Waialae Avenue, Dale Street, and Kapahulu Avenue, where the Ala Wai Golf Course is now being envisioned by the State administration to become a major regional park attraction, and "urban villages" and "village arms" to be developed on consolidated lots along these routes, with such consolidated development accessed by high capacity transit corridors also proposed for the McCully-Moanani area along King Street and Dale Street, the Sheridan area, and Bingham Tract. Yet, all of the above linkages are virtually undisclosed and remain unaddressed in the MISDEIS, which specifically refers to "Transit Villages of the Twenty-First Century" as a resource document (MISDEIS @ 5-6). Therefore, it is highly evident that the MISDEIS is incomplete even in draft form, and it is of overriding concern that the cumulative impact of the Larger Project remains undisclosed.

**Response:** Many of the specifics of the 1999 Draft of the PUC DP relevant to the proposed project were not provided in the MISDEIS because the 1999 Draft was not adopted by the City Council, and therefore, was not the official plan. The 1999 version was and still is the official PUC DP. For your information, the Department of Planning and Permitting released another Draft PUC DP in May 2002, but as of October 2002, it has not yet been adopted by the City Council. The May 2002 Draft does not mention "high capacity transit corridors" on Waialae Avenue, Dale Street, and Kapahulu Avenue. Instead, it states, "Identify and stimulate transit-oriented development on potential infill and redevelopment properties within the Bus Rapid Transit (BRT) corridor." Therefore, any implicit concern contained in this comment may no longer be an issue. Cumulative impacts are discussed in Section 5.13 of the FEIS.

47. In addition, there is also justified concern about the undisclosed linkage to an undefined "Kaimuki Transit Center", as listed with the Waialeale Transit Center and the Middle Street Transit Center in the MISDEIS (Figure 2.5-19 @ 2-39) which states that "connections ... to the regional and In-Town BRT systems would occur at transit centers" and "enhanced local circulation and access to the BRT systems..." and "intermodal access (e.g. automobile, pedestrian, bicycle) and intermodal access (e.g. connections between feeder and line haul transit routes) to the regional and In-Town BRT systems would occur at transit centers and park and ride lots" (MISDEIS @ 2-18 and 2-22). Further, the DEIS describes transit centers as having certain characteristics, such as passenger shelters, retail and public facilities, and street furniture, ornamental lights and landscaping (MISDEIS @ 5-40). However, the MISDEIS neither describes any location nor illustrates any linkage to the "Kaimuki Transit Center", which is also now represented at public meetings to be planned as a "neighborhood bus stop" adjacent to a school on Waialeale Avenue. However, because this proposed facility is sited in the MISDEIS as a Transit Center at an undisclosed location in Kaimuki, but such mention the MISDEIS might also be authorizing such a development at other hub sites on Waialeale Avenue, such as Market City where Keolu Blvd, Kapahulu Avenue and Waialeale Avenue intersect.

**Response:** The FEIS clarifies that the smaller on-street transfer points such as proposed for Kaimuki are modest in scope and would not involve any major new construction. Their primary function would be to allow for the convenient transfer between circulator routes and other bus routes that connect that community with other communities. The proposed Kaimuki Transfer Point would be on Koko Head Avenue just north of Waialae Avenue.

48. Of equal concern is the curious absence of peripheral parking locations for Waialae hotel and shop employees as briefly mentioned in the MIS/DEIS and as independently recommended in the Joint Waialae Task Force (JWTF) report of December, 1999, and the impact this will have on surrounding communities. However, the MIS/DEIS does point out that it has been seen in other cities that most land use impacts are generally concentrated within 1/4 mile of a transit stop (MIS/DEIS @ 5-10).

**Response:** There are no parking locations planned as part of the Refined LPA beyond those identified as park-and-rides or transit centers in this FEIS. Waialae employees could use any of the numerous park-and-ride facilities located throughout the island.

49. As the location(s) of Waialae peripheral parking facilities servicing the Waialae segment of the proposed fixed transit system, and the impact of access to them through surrounding communities are not addressed in the MIS/DEIS, we emphasize that this should be accomplished before the MIS/DEIS is given further consideration.

**Response:** See response to comment #48.

50. Further, City officials claim the components of the MIS/DEIS have been chosen and crafted by the community. However, in light of community concerns and questions expressed at the recent public meetings on the MIS/DEIS, this appears to be somewhat of a misrepresentation. In fact, on November 2, the McCully-Moai community board announced, "The proposed dedicated fixed tram routes through McCully-Moai, as communicated by the City administration via the Department of Transportation Services as the preferred routes voiced by McCully-Moai residents during the Trans 2K community meetings," were never supported by participants from our community. The same can be said for the Diamond-Head Kapahulu community.

**Response:** It is not DTS's intent to misquote anyone. We are unable to verify this misquoting based on the information provided in the comment.

51. The Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board therefore requests that any consideration of in-town separated transit lanes be deferred until a) the Primary Urban Center Development Plan revision has been publicly reviewed, approved, and adopted; and b) until all segments of the larger project are fully disclosed and described in the MIS/DEIS, including peripheral parking locations contiguous to Waialae and Enokas to outlying transit centers at undisclosed locations, such as, but not limited to, the "Kaimuki Transit Center" briefly referenced in the MIS/DEIS.

**Response:** See responses to comments #45, #47, #48 and #49.

52. The MIS/DEIS is deficient in its analysis of alternative transportation technologies, confirms that candidate technologies for the proposed in-town system are not yet fully proven, and admits that a

decision on the type of transit technology cannot be made at this point. Yet, the City is moving on a fast track towards approval of a \$1 billion system at estimated base cost, including future equipment replacement.

**Response:** See response to comment #26.

53. Further, the MIS/DEIS proves that state-of-the-art technological advances will make today's plans obsolete, where such a permanently-fixed system as the one proposed may indeed be outdated by more flexible, cost-effective alternative energy systems before the proposed system can be completed.

**Response:** A decision on the final technology for the In-Town BRT will not be made until 2008. At that time the technology assessment will involve working with suppliers and researchers to determine the state-of-the-art technology that will meet the long-term needs of the City. The Refined LPA incorporates anticipated technological advances and considers methods for allowing incorporation of technological advances in the future.

54. There is also a weighty concern that elected City officials have recently claimed there will be no increase in taxes to build the proposed in-town transit system, but they neglect to define whether any City services and necessary capital improvements will be sacrificed so this system can be paid for without raising taxes.

**Response:** See response to comment #7.

55. Thus, the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board advocates full reconsideration of the proposed fixed high-capacity transit corridors along Kapiolani Boulevard, University Avenue, Kalia Avenue, Kapahulu Avenue and Kūhoā Avenue to allow for a) a comprehensive urban Honolulu traffic management plan based on current, area-specific statistics; b) independent evaluation undertaken by nationally-recognized experts to determine where there can be more efficient and flexible use of transit options, with more time saved for more people over the greatest area; and c) future consideration of fully-proven candidate technologies, in order to define the most suitable type of transit technology for Honolulu and ensure a reliable, economic and efficient transportation system with more flexible operations.

**Response:** a) The Refined LPA is only one element in a comprehensive set of multi-modal improvements planned for in the Oahu Regional Transportation Plan (TOP 2025). b) The Federal Transit Administration (FTA) is responsible for reviewing the comparative cost-effectiveness of all new proposed transit systems before Federal New Starts funding can be received. c) The FEIS proposes two possible technologies: hybrid-electric and embedded plate (EPT). Both technologies have been under development for several years. Hybrid-electric technology is in revenue service elsewhere and EPT is in the process of becoming service-proven. No technology will be implemented before it is service proven. Hybrid-electric buses will be deployed as an interim technology while other viable long-term technologies are being proven in service elsewhere. See response to comment #26.

56. In addition, the City and County of Honolulu will need to demonstrate the claim that the cost to develop such a system will ensure that there will be neither an increase in local taxes nor sacrificing of City services, repairs, operations, improvements, or any other necessary day-to-day functions of the City, no matter whether they are budgeted and funded under capital improvements or under operations.

**Response:** The financial analysis in Chapter 6 of the FEIS assumes that the City will need to phase the project as money is available from different federal and local sources, without raising taxes for either capital or operating expenses. The analysis shows how that can be done within the current financial capability of the City.

57. Another overriding concern expressed by community leaders and concerned citizens is that no physical traffic testing has been conducted to determine the impact of separated lanes for the proposed in-town train corridors on Kapolei Boulevard, University Avenue, Kalakaua Avenue, Kapahulu Avenue and Kuhio Avenue, or to demonstrate that such traffic lane re-allocation will result in less traffic congestion.

**Response:** See response to comment #22.

58. Consequent to separated transit corridor lanes and platforms consuming major portions of traffic arteries and thoroughfares, traffic congestion and gridlock will escalate even if fewer people are driving cars and more are using transit. In addition, the MISDEIS states that such would result in a reduced level of service for auto traffic within the urban core.

**Response:** The Refined LPA proposes reallocation of general-purpose lanes for transit as the most reasonable way to achieve greater person carrying capacity in the future. The Refined LPA will provide an attractive, dependable, affordable alternative to the private automobile. It is not the conversion of lanes that will create the congestion, the congestion for motorists will be there without the BRT. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

59. Further, the MISDEIS states that parades and large events will not be affected, as rapid transit would be rerouted and replaced by buses during parades and large events (see MISDEIS @ 4-19 and 4-29). As parades are frequent in Waikiki, and the JMTF recommends even more festivals and parades to "recapture the Magic of Waikiki", rapid transit could conceivably be replaced by buses more often than not.

**Response:** Just as with existing bus routes, design of the BRT vehicle will allow it to divert to alternate routes during parades and other special events. Specifically in Waikiki, the BRT will use Kuhio Avenue in both directions or turn back prior to entering the affected portions of Waikiki and have patrons transfer to local buses which will continue to serve Kuhio Avenue. Since most parades are of limited duration and frequency it is hard to imagine that there could ever be more hours where the In-Town BRT would be re-routed than hours where it follows the proposed routing.

60. Although this system is proposed to be permanently fixed within Honolulu's main traffic arteries, there is serious concern that there has been no effort to demonstrate that a) that no massive gridlock will occur, b) that vehicular traffic congestion will not increase exponentially with the permanent re-allocation of existing vehicular traffic lanes to dedicated high-occupancy lanes, and c) that traffic squeezed out of these main thoroughfares will not overflow or migrate into the surrounding communities and neighborhoods, as now demonstrated by current conditions during roadwork, water main, and other infrastructure repairs.

**Response:** A test of closing a lane is not a test of what will happen with the In-Town BRT in the long-term. It is only a test of what happens when a lane is temporarily closed, which is something everyone knows the consequences of from when lanes are temporarily closed during utility construction.

As is pointed out in Chapter 4 of the FEIS, over time there will be enough people diverted from autos to transit to offset the impact of converting lanes for priority use by buses. This diversion from autos will only happen once it is clear that the BRT installation is a permanent improvement, not part of some test.

What is proposed with the first branch between Iwilei and Waikiki will be a good test of the ability of BRT to attract new riders and the impacts of converting lanes in selected locations.

61. The Diamond Head/Kapahulu/S. Louis Heights Neighborhood Board opposes further consideration of in-town separated transit until physical traffic testing is conducted over a period of several months, including along Kapolei Boulevard, University Avenue, Kalakaua Avenue, Kapahulu Avenue and Kuhio Avenues, to demonstrate successful mitigation of the expected exponential traffic overflow impact on surrounding communities and neighborhoods.

**Response:** See response to comment #22.

62. In addition, the MISDEIS relies on arbitrary ridership projections for the proposed in-town transit system "based on today's needs", as stated by a City transportation consultant. Such projections stem from the 1990 Islandwide Oahu Census, as revised downward by 50,000 in 1999 by the State Department of Business, Economic Development and Tourism and as arbitrarily allocated solely to the Primary Urban Center by the City for the purpose of the MISDEIS and qualifying for federal funds. However, in addition to arbitrary allocation of islandwide population to the Primary Urban Center for the purpose of the MISDEIS, such arbitrary projections do not take into consideration a) the decrease in automobile registrations and bus ridership, b) corporate incentives for ride-sharing and van-pooling, c) more employees and businesses now choosing "telecommuting" over commuting to a downtown office, and d) the State administration advocating staggered work hours for City and State employees.

**Response:** The travel forecasts for the Primary Corridor Transportation Project are not arbitrary, they were developed using travel forecasting procedures developed for the Oahu Metropolitan Forecasting Model Development Project in April 1998. These procedures simulate the choices made by residents, businesses, and visitors regarding the nature, number, mode, time-of-day, and geographic orientation of trips that they make on a typical weekday. The procedures have been developed with data obtained in extensive surveys of Oahu households, transit riders, and air passengers. Future year forecasts reflect the population and employment forecasts that have been prepared by DBEDT and the zonal allocations that have been prepared by the City Department of Planning and Permitting.

These forecasts were prepared for all future planning being done by the City and State and were not "arbitrarily allocated" for this or any other project to qualify for federal funds as is alleged. The forecasts do reflect recent and long-term trends in trip making, mode usage, and efforts of travel demand management measures.

The travel forecasting methodology and resulting travel forecasts used for the Primary Corridor Transportation Project are described in Chapter 2 of Product 7-19 Technical Memorandum of Travel Forecasting Results (Final). The transportation plan for Oahu is described in the Oahu Metropolitan Planning Organization's report, Transportation for Oahu Plan TOP 2025, April 6, 2001.

63. *How does the MISDEIS disclose who the perceived potential riders are other than the current bus ridership, and how they can be cajoled out of their valued vehicles - or how the in-town fixed transit operations costs and subsidies would be shared between the proposed in-town ridership and Honolulu taxpayers. Due to such arbitrary and incomplete statistical and fiscal information, we question the urgency to make a decision on establishing the proposed in-town dedicated fixed transit system.*

**Response:** Chapter 4 of the FEIS does define the composition of the ridership of the proposed transit system for all three alternatives. Chapter 6 of the FEIS shows the amount of O & M costs paid for from user fares and the amounts paid for from other sources including subsidies. The City Council passed Resolution 00-28, CD-1, that sets a policy that "the bus farebox recovery ratio not fall below 27 percent nor exceed 33 percent."

64. *Expressed concerns have also been presented regarding the proposed in-town tram system's consumption of the needed eastbound traffic lane on Kalanika Avenue so the system might loop around Waialae. One lane removal has recently occurred, where the City has reduced four traffic lanes to three lanes along Kalanika Avenue in order to expand the Kule Beach recreation area. With the proposed addition of a dedicated rapid transit lane, traffic would be reduced to two lanes that would include stopping and loading by delivery, tour and other commercial transportation vehicles. This portends disaster for Waialae by causing further congestion and gridlock of Waialae's internal traffic and services. Thus, removal of any of the remaining vital vehicular traffic lanes on Kalanika Avenue is unthinkable and unwarranted.*

**Response:** The proposed in-town BRT lane along Kalanika Avenue has been revised. The proposed curbside BRT lane would extend from Saratoga Road to Uluia Avenue as a semi-exclusive lane, which allows private buses and right turning vehicles to share the curbside lane with the BRT. Koko Head of Uluia, the BRT will operate in mixed traffic to Kalanika Avenue where it turns left in the mauka direction.

65. *The MISDEIS is deficient in addressing the proposed in-town fixed transit system's impact on private transportation systems. Pertaining to the proposed in-town fixed transit system in Waialae, transportation carriers, unions and hotel interests have expressed concerns that include a) displacement of established local carriers who provide frequent and convenient stops, b) jeopardy to the survival of such carriers who service Waialae successfully and without subsidy (see: 1999 Joint Waialae Task Force report, Appendix B), c) impact to tax revenues by such losses while spending more on higher public transportation subsidies, d) restricted curb lanes for trams running away four (4) minutes that force four buses, trolleys and taxis to unload elsewhere and to use limited vehicular lanes to do so (see MISDEIS @4-24), and e) impact on transport and delivery routes for goods and services that are Waialae's lifeline to survival as a major visitor destination.*

**Response:** See response to comment #23.

66. *The Diamond Head/Kapahu/St. Louis Heights Neighborhood Board opposes construction of an in-town fixed and separated transit corridor loop around Waialae that disrupts the transport and delivery of goods and services, displaces local carrier carriers who provide frequent and convenient stops, jeopardizes the survival of such carriers who service Waialae successfully and without subsidy, and that impacts transport and delivery routes for goods and services.*

**Response:** See response to comment #23.

67. *There is paramount concern that the MISDEIS is seriously deficient by neglecting to disclose that Kapiolani Park is within the Diamond Head Special District; that the Park is listed on the Hawaii State Register of Historic Places; and that the Park is protected under the provisions of a public charitable Trust which precludes construction of municipal facilities or any other encumbrance of Trust lands. Although not disclosed in the MISDEIS, one of the 24 power sub-stations the size of a "small house" is planned to be constructed within Kapiolani Park Trust lands (see: In-Town BRT Map No. 14, dated July 24, 2000).*

**Response:** Thank you for the information about Kapiolani Park. The information provided is now in the FEIS. For your information, the proposed In-Town BRT alignment in Waialae would not traverse Kapiolani Park, including Honolulu Zoo, or the Diamond Head Special District. Although the easternmost section of the alignment would be along Kapahu Avenue, which is just outside the park and special district, it would be consistent with the land use objectives of the Special District. In addition, as a result of the comments received regarding traction power supply station locations and further project refinements since the MISDEIS was distributed, the station originally shown in the Kapiolani Park area has been relocated to a site along Kule Avenue. It should also be noted that substations would only be constructed if the embedded plate technology is selected.

68. *The MISDEIS states that according to the "Environmental Baseline Report" dated June, 1999, landscapes with the highest visual quality and character include Kapahu Avenue between Kalanika Avenue and Kule Avenue (MISDEIS @ 3-52). However, the MISDEIS curiously omits the Diamond Head Special District when referring to special view opportunities in special districts that have a "distinctly unique character due to cultural and historical context". Pursuant to the City's Land Use Ordinance, significant viewplains surrounding Diamond Head and Historic Kapiolani Park are protected within the Diamond Head Special District. However, the DEIS proceeds to ignore the special district zoning designation of the Diamond Head area as a historic, cultural and scenic District.*

**Response:** FEIS Section 3.4.3 has been revised to include Diamond Head as an important viewshed along the potential project alignment. The Revised LPA will not affect the Diamond Head viewshed.

69. *Within this designated special district is situated the historic property of the Kapiolani Park Trust, on which a transit stop is planned adjacent to the Zoo parking lot. Curiously, this remains undefined in the MISDEIS, although a rapid transit station site is disclosed on photographic overviews distributed at the MISDEIS information meetings on October 2 and 5. Further, the MISDEIS discloses that the "area of potential effect" on historic resources is impacted by BRT station stops, transit centers, and new ramps where such facilities might be elevated.*

Response: While the proposed In-Town BRT transit stop would be located adjacent to Honolulu Zoo, it would not use any of its property. The transit stop would not affect the historic characteristics of Kapiolani Park.

70. The MISDEIS states: "Parklands: Use of the overflow parking lot at Aloha Stadium (relating to prior federal ownership of the land) would be coordinated with the Aloha Stadium Authority (MISDEIS @ S-16). However, the DEIS mentions nothing about the proposed transit stop at Kapiolani Park and the impact on the historic Kapiolani Park Trust lands, specifically the Zoo parking lot restricted solely for park use in Kapiolani Park under court order (see, S.P. No. 89-0015, Conclusions of Law and Order @ 12 and 13). The impact on the Zoo parking lot and surrounding area as proposed to service a rapid transit stop is not addressed in the MISDEIS.

Response: There is no plan to use the zoo parking lot for a park-and-ride.

71. Also of significant absence in the MISDEIS is the fact that Kapiolani Park was listed on the Hawaii State Register of Historic Places in 1992 and is eligible for the National Register, thus protected by federal historic preservation laws.

Response: See responses to comments #87 and #89.

72. The monkeypod trees within the Zoo parking lot of Kapiolani Avenue are an integral part of the historic landscape of Kapiolani Park, and living assets of the Kapiolani Park Trust. Collectively, they are a significant landscape feature along Kapiolani Avenue, a portion of which is also within Kapiolani Park Trust lands. Yet, the MISDEIS discloses that the monkeypod trees at this location are planned to be removed, relocated or cut back for rapid transit purposes (figure 5.7-1B), and the MISDEIS is silent on the significant negative impact this may have on the irreplaceable historic landscape and viewpoints of Kapiolani Park.

Response: The monkeypods on Kapiolani Avenue at the Honolulu Zoo parking lot are part of the Kapiolani Park Trust lands, and may require some pruning, but they will not be removed nor relocated. Therefore, it is not expected that the pruning would have significant negative impacts on the landscape or viewpoints of Kapiolani Park Trust lands. The FEIS tree impacts discussion has been expanded to provide details on the individual tree impacts expected from the Refined LPA.

73. Further, the MISDEIS states that there could be special paving at crosswalks, street lighting, banners, street furniture, and plantings along the entire corridor, which would "enforce the character of the area and sense of place." Kapiolani Park is a protected historic landscape, and the Zoo parking lot (along Kapiolani Avenue) is replete with majestic Monkeypod trees. To add a cluttered carnival of banners, street furniture and decorative paving would compromise the historic character and integrity of the historic landscape along Kapiolani Avenue, and annihilate Kapiolani Park's enduring historic sense of place.

Response: The appropriateness of paving, landscape treatment, street furniture and lighting will be sensitively accomplished, with input from various community groups. It is true that there needs to be a balance, and that "sense of place" should be maintained and even reinforced.

74. In addition, the MISDEIS states that the embedded electro-pole technology of the rapid transit system "requires substations every 1/2 mile (i.e., 24 buildings about the size of a small one-story house). They could be designed to blend in with the surrounding neighborhoods and placed

underground where the water table permits, if necessary" (MISDEIS @ 5-38). Such a rapid transit electric substation is planned on Kapiolani Park Trust lands at the Zoo parking lot adjacent to a transit stop. This would not appear to have the ability to meet the "visual compatibility" assessment for Kapiolani Park's important visual resource, as the bracket water table is only inches below the sandy sub-surface layer. Ironically, the MISDEIS claims that this "offers an opportunity to enhance the visual quality of the streetscape..." (MISDEIS @ 5-38), and completely ignores Assessment of Effect on this historic resource on table 5.10-1.

Response: See response to comment #67.

75. Nor would such a municipal utility facility as a power substation be in conformance with the Court's findings (see: SP No. 89-0015, City and County of Honolulu v. State Attorney General and Kapiolani Park Preservation Society). Notably, the Court order prohibits use of Kapiolani Park Trust lands for municipal facilities, and provides for addition of adjacent lands to the Trust to compensate for ongoing municipal use of such lands for a pre-existing fire station, while continuing to retain such lands within the Trust.

Response: See response to comment #67.

76. At a City Council presentation and public hearing on the MISDEIS on October 5, a Trans Hawaiian transportation representative recommended converting Jefferson School to a BRT terminus. In response, the City Councilman for the district and Kapiolani Park Trustee interjected a suggestion for such use on only that portion of the school site which is currently open space. However, much of this contemplated portion of Jefferson School along Kapiolani Avenue is also within the historic Kapiolani Park Trust boundary (see: Monsarrat Survey Map dated 1883). Prior to this, at a Kapiolani community visioning group meeting on June 21, 2000, the same Kapiolani Park Trustee and City Councilman for the district suggested that the community "think large" and consider the Kapiolani Park Trust lands at the Zoo location and at Jefferson School as possible sites for a municipal parking lot and transit center locations. The significant impact of such suggestions, as well as the impact of the proposed transit stop on the Zoo parking lot set aside for park use only, and the impact on the surrounding community through which transit riders would commute to park at the Zoo parking lot, are not addressed in the MISDEIS. This supports the conclusion that the cumulative impact of the larger project has not been addressed, much less discussed, in the MISDEIS.

Response: The Refined LPA will not use Jefferson School as a municipal parking lot or transit center location. The Kapiolani transit stop, while adjacent to Honolulu Zoo, would not use any of its property. The transit stop will not affect Kapiolani Park, and will be consistent with land use objectives of the Diamond Head Special District. Cumulative impacts are fully discussed in the MISDEIS and in FEIS Chapter 4, Transportation Impacts and Chapter 5, Environmental Analysis and Consequences.

77. There is mounting concern that the in-town tram system is planned to run along a separated traffic lane on the makai side of Kalaikoa Avenue, further impacting ancient Hawaiian burials at this location, which is also neither mentioned nor addressed in the MISDEIS. The MISDEIS generally states, "Should archaeological resources be encountered during construction, work would stop immediately and the State Historic Preservation Officer would be contacted" (MISDEIS @ S-16). However, the MISDEIS then specifically refers to potential disturbance on Middle Street and Kalia Road, but mysteriously does not mention Kalaikoa Avenue (MISDEIS @ 5-66), where such disturbance has happened several times before in Waikiki, most recently

# CORRECTION

THE PRECEDING DOCUMENT(S) HAS  
BEEN REPHOTOGRAPHED TO ASSURE  
LEGIBILITY  
SEE FRAME(S)  
IMMEDIATELY FOLLOWING

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**Response:** There is no plan to use the zoo parking lot for a park-and-ride.

71. Also of significant absence in the MIS/DEIS is the fact that Kapiolani Park was listed on the Hawaii State Register of Historic Places in 1992 and is eligible for the National Register, thus protected by federal historic preservation laws.

**Response:** See responses to comments #67 and #89.

72. The monkeypod trees within the Zoo parking lot of Kapiolani Park are an integral part of the historic landscape of Kapiolani Park, and living assets of the Kapiolani Park Trust. Collectively, they are a significant landscape feature along Kapiolani Avenue, a portion of which is also within Kapiolani Park Trust lands. Yet, the MIS/DEIS discloses that the monkeypod trees at this location are planned to be removed, relocated or cut back for rapid transit purposes (figure 5.7-1B), and the MIS/DEIS is silent on the significant negative impact this may have on the irreplaceable historic landscape and viewpoints of Kapiolani Park.

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**Response:** The appropriateness of paving, landscape treatment, street furniture and lighting will be sensitively accomplished, with input from various community groups. It is true that there needs to be a balance, and that "sense of place" should be maintained and even reinforced.

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underground where the water table permits, if necessary" (MIS/DEIS @ 5-38). Such a rapid transit electric substation is planned on Kapiolani Park Trust lands at the Zoo parking lot adjacent to a transit stop. This would not appear to have the ability to meet the "visual compatibility" assessment for Kapiolani Park's important visual resource, as the bracketish water table is only inches below the sandy sub-surface layer. Ironically, the MIS/DEIS claims that this "offers an opportunity to enhance the visual quality of the streetscape..." (MIS/DEIS @ 5-39), and completely ignores Assessment of Effect on this historic resource on table 5.10-1.

**Response:** See response to comment #67.

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**Response:** The Refined LPA will not use Jefferson School as a municipal parking lot or transit center location. The Kapiolani transit stop, while adjacent to Honolulu Zoo, would not use any of its property. The transit stop will not affect Kapiolani Park, and will be consistent with land use objectives of the Diamond Head Special District. Cumulative impacts are fully discussed in the MIS/DEIS and in FEIS Chapter 4, Transportation Impacts and Chapter 5, Environmental Analysis and Consequences.

77. There is mounting concern that the in-town tram system is planned to run along a separated traffic lane on the makai side of Kalaniana'olaha Avenue, further impacting ancient Hawaiian burials at this locations, which is also neither mentioned nor addressed in the MIS/DEIS. The MIS/DEIS generally states, "Should archaeological resources be encountered during construction, work would stop immediately and the State Historic Preservation Officer would be contacted" (MIS/DEIS @ S-16). However, the MIS/DEIS then specifically refers to potential disturbance on Middle Street and Kala Road, but mysteriously does not mention Kalaniana'olaha Avenue (MIS/DEIS @ 5-66), where such disturbance has happened several times before in Waikiki, most recently



when public works projects along Kalakaua Avenue unearthed and disturbed Hawaiian burials – causing great public outcry and controversy. An embedded electro-plate transit corridor along the same route will undoubtedly disturb several more hui kupuna. Yet, the MISDEIS states further that, "An archaeological contingency procedure would be developed in the unlikely event that 'unanticipated' resources are encountered during construction." (MISDEIS @ S-17).

**Response:** Section 5.10.2 of the FEIS under the Refined LPA has been revised to disclose the potential for uncovering subsurface archaeological resources, such as cultural layers and deposits and human burials, during construction of the Middle Street maintenance facility and transit center, the In-Town Transit Center, and at certain sections of the In-Town BRT should embedded plate technology be used. The FEIS includes the results of the archaeological assessment of the Refined LPA.

78. The Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board opposes construction of an in-town fixed and separated transit corridor loop around Waikiki, including along Kapahulu Avenue, a) that necessitates the construction of power substations and peripheral parking for its support within the Diamond Head Special District and/or within Kapohali Park Trust lands as listed on the Hawaii State Register of Historic Places, and b) that is permanently embedded on the makai side of Kalakaua Avenue, impacting the one of Oahu's significant views, the Kalakaua Avenue/Waikiki Beach coastal viewplane, and disturbing ancient Hawaiian burials along the Kalakaua Avenue shoreline. By such omissions as the above, and with the cumulative impacts of such facilities on the Waikiki area and surrounding communities and parklands remaining undisclosed, the MISDEIS is rendered defective and deficient.

**Response:** There will be no substations or peripheral parking for the In-Town BRT within the Diamond Head Special District and/or within Kapohali Park Trust Lands. The physical improvements that would be visible along Kalakaua Avenue would be minimal, consisting of a single transit station along the street on the makai side. The transit station would be designed as an open, welcoming structure, well landscaped and integrated into the existing promenade.

79. There is serious concern that the in-town tram system is planned to run along a separated traffic lane on the makai side of Kalakaua Avenue, impacting the Kalakaua Avenue/Waikiki Beach coastal viewplane, one of Oahu's significant views. The MISDEIS states that according to the "Environmental Baseline Report" dated June, 1999, landscapes with the highest visual quality and character include the portions of Kalakaua Avenue along Waikiki Beach. In addition, the Kalakaua Avenue/Waikiki Beach coastal viewplane is listed as one of Oahu's significant views as identified on the City's "Coastal View Study" of 1987. (MISDEIS @ 3-52). A high-capacity dual tram every four minutes and associated transit stops dedicated to the makai lane of Kalakaua Avenue would adversely impact the shoreline viewplane and "Hawaiian Sense of Place" along the length of Kūhio Beach and in front of the historic Moana Hotel. This would result in a misplaced and ultimately destructive endeavor, demonstrating that the "Hawaiian sense of place" continues to elude City planners.

**Response:** Because the visual quality and character of the Kalakaua Avenue/Waikiki Beach environment is rated very high, great care will be exercised in designing the alignment through this area. The proposed BRT system will have no visible overhead lines or rail tracks in the street. The stop at Uluia Avenue would be designed as an open, welcoming structure, well landscaped, and integrated with the existing promenade.

80. Further, there is significant community concern that a) the MISDEIS states that "The majority of trees potentially affected are the monkeypods along Kapohali Boulevard from Pensacola Street to Isenberg Street" where they will be removed, relocated or cut back to make way for the transit corridor, b) that transit corridor exclusive median lanes will be constructed along the length of University Avenue, together with platforms and driveway curbs that bisect the main thoroughfare and divide the community and neighborhoods through which it runs, and which will necessitate the removal of the recently-planted Shower trees, and c) that historic monkeypod trees will be removed, replaced or cut back in the vicinity of Kapohali Park (MISDEIS @ 5-56 and figure 5.7-1B). Yet, the MISDEIS is vague and unresponsive regarding the exact locations, and the size and value of these historic trees and landscapes.

**Response:** The discussion on tree impacts in the FEIS has been expanded to provide details on specific tree impacts expected from the project action. Where possible, project designs have avoided trees. However, some trees will have to be set back slightly, relocated or removed and replaced to allow for necessary road widening. In particular, ten monkeypod trees on Kapohali Boulevard will be replanted farther from the curb. Trees to be moved will be pruned before replanting. Their canopy is expected to grow back within one year, with full recovery in three to five years. In the event that some larger trees cannot be successfully replanted, they would be removed and replaced with smaller trees of the same species. Recently planted Rainbow Shower trees on University Avenue would be relocated in the same area to allow for necessary reconfiguration of the roadway. No trees in Kapohali Park proper would be affected, but some trees in the Kapohali Park Trust lands on Kapahulu Avenue at the Honolulu Zoo parking lot may have to be pruned, but they will not require removal or relocation.

81. There is also serious concern that the MISDEIS states that "some landscaping would be lost from the Convention Center on the makai side of Kapohali Boulevard in order to widen the Kapohali/Kalakaua intersection" to make way for the in-town tram system. With the recently-planted lush landscape screening removed, this prominent street frontage would then be left with a huge concrete facade which was intended to be concealed, softened and cooled by landscaping.

**Response:** Minimal landscaping will need to be removed at the Convention Center. Whatever is removed will be relocated or replaced with similar types of trees in the same general location.

82. Thus, there is serious concern that the planned changes to the physical environment, including the removal of decades of beautification efforts that have generated established trees and landscaping, and the addition of fixed transit lanes bisecting and dividing neighborhoods, will contribute to a cumulative loss in the quality of life for the surrounding communities.

**Response:** The In-Town BRT has been carefully planned to minimize the loss of existing trees. In certain areas along the alignment, particularly Dillingham Boulevard and Kūhio, extensive additional landscaping is proposed including sidewalk reconstruction, tree plantings, and other vegetation. The BRT will be designed to provide a greater sense of visual order and unity because of physical improvements and landscape treatments along the alignment. There could be special paving at crosswalks, street lighting, street furniture, and plantings along the entire corridor which would reinforce each area's unique character and sense of place. In historic districts designs will be coordinated with the State Historic Preservation Department and representatives of the special districts. Where existing landscaping is affected by the BRT, mitigation is proposed.

BRT priority lanes will be identified by colored pavement, but otherwise will look the same as the rest of the street. This will not create a barrier. To the contrary, the BRT stops have the potential through community input during design to become cherished parts of each community.

83. The Diamond Head/Kapahu/St. Louis Heights Neighborhood Board opposes construction of an in-town separated high-capacity transit corridor a) along Kapiolani Boulevard, where monkeypods from Pensacola Street to Ikenburg Street are slated to be removed, relocated or cut back to make way for the transit corridor, b) along University Avenue where a fixed two-way transit corridor is planned to be constructed in the street median, thus necessitating the removal of the recently-planted Shower trees, c) within the Kapiolani/Kalaka intersection on the makai side of Kapiolani Boulevard where the recently-planted and costly landscaping fronting the Convention Center would be lost to make way for the in-town transit lanes, and d) within the Diamond Head Special District and Kapiolani Park Trust lands where historic monkeypod trees are slated to be removed, replaced or cut back to make way for the in-town fixed transit line and ancillary facilities.

Response: See responses to comments #80, #81, and #82.

84. Conclusively, public comments, questions and concerns emanating from the community sector indicate that the MISDEIS is a) premature, as the City is without the capability to represent defined technology and subsequently specific costs thereof, b) segmented, by not disclosing the cumulative impacts of the larger project as required by federal and state environmental impact statement regulations, and c) incomplete, by neglecting to address the types of transit contemplated to access certain locations, the linkage to and types of transit centers and facilities at other locations, and how the components of the proposed plan correlate with the existing Primary Urban Center Development Plan and its 1999 proposed revisions, and d) inadequate, by not addressing increased congestion caused by converting existing traffic lanes into separate transit corridors to accommodate fixed transit lanes, and the necessary mitigation thereof.

Response: a) The FEIS proposes two possible technologies: hybrid electric and embedded plate. Both technologies have been under development for several years and are in the process of becoming service-proven. To be conservative, the higher-cost technology was used for costing purposes. b) Cumulative impacts are fully discussed in the MISDEIS and the FEIS in Chapter 4, Transportation Impacts and Chapter 5, Environmental Analysis and Consequences. c) The types of transit that will service various locations, their linkages, transit centers and facilities, are described in Chapter 2 of the MISDEIS and FEIS. How components of the project relate to the PUC DP and its proposed revisions is discussed in Chapter 5 of the FEIS. d) Traffic impacts, which include level-of-service analyses of streets and intersections in the study area, are discussed in Chapter 4 of the MISDEIS and FEIS.

85. In light of the above, the Diamond Head/Kapahu/St. Louis Heights Neighborhood Board opposes any high-capacity transit corridor, peripheral facilities and ancillary infrastructure that will adversely or intrusively impact Waikiki shoreline viewplains, historic sites and landscapes, parklands, internal traffic patterns, visitor center support services, surrounding communities and neighborhoods, and the "Hawaiian Sense of Place".

Response: See responses to comments #23, #27, #59, #67, #70, #72, #76, #79, #80, and #82.

86. We question the rationale behind promoting an in-town fixed rapid transit to replace more convenient and flexible circulator systems, and thus advocate full reconsideration of in-town fixed

transit corridors and determination in the future where there can be more efficient and flexible use of time-proven technology. Honolulu has a nationally-recognized bus system, and the City administration must continue to maintain and maximize this resource to its fullest potential, including but not limited to flexible in-town circulators; express-bus, zipper-lane, and alternative energy upgrades; and ridership incentives.

Response: The In-Town BRT is only one element of the transit plan for the Primary Urban Center. The plan also includes conversion of the bus system to a hub-and-spoke network. The hub-and-spoke network will consist of new local circulator routes, as well as continuation of many existing line haul and express routes. The goal is to have an integrated network of transit services that provides convenient and cost-effective options for potential users.

87. In conclusion, the Diamond Head/Kapahu/St. Louis Heights Neighborhood Board rejects the proposed embedded transit system planned between Middle Street and Kapahu Avenue, described in the MISDEIS as the in-town BRT Alternative, for the reasons stated and outlined above. Instead, the Diamond Head/Kapahu/St. Louis Heights Neighborhood Board strongly recommends the flexible, modifiable bus transit alternative, described in the MISDEIS as the Primary Corridor Transportation Project, and supports the best efforts of the City and County of Honolulu to expedite and fulfill the commitment to expand and maintain the Transportation System management program to ensure that it is efficient, cost-effective and reliable.

Response: Comment noted. It states the commenter's preference for a LPA.

88. We are pleased to inform you that we strongly support continuation and full implementation of the flexible and modifiable Transportation Service Management (TSM) Alternative to serve the entire Primary Corridor, including the Urban Honolulu segment between Middle Street and Kaimuki.

Response: Comment noted. It states the commenter's preference for a LPA.

89. However, with respect to Bus Rapid Transit (BRT) Alternative, there appears to be sufficient reason to expect significant adverse in-town impacts on traffic patterns, business districts, neighborhoods, private transportation carriers, and surrounding communities from the magnitude of this proposed cumulative transportation project.

Response: Chapter 4 of the FEIS addresses transportation impacts of the project. See response to comment #58.

90. Thus, we find we can neither support nor recommend the proposed In-Town BRT Alternative for the purpose of the public decision-making process on this project.

Response: Comment noted. It states the commenter's preference for a LPA.

91. Our concerns, questions and comments focus on the proposed BRT Alternative. Our specific concerns include, but are not limited to, the following: lack of correlation to pending Primary Urban Center development plan revisions;

Response: There is no indication of when the updated Primary Urban Center Development Plan (PUC DP) will be adopted by the City Council. The environmental review process of the Primary Corridor Transportation Project (PCTP) cannot be delayed pending this outcome. The In-Town

BRT has been designed to support current land uses and future land use patterns, particularly in vacant and underutilized parcels in Kakaako, Waiwai, and near Ala Moana Center and the Convention Center. These are the locations where development is likely to occur with or without the PCTP. Because of this, the Refined LPA has been evaluated in the FEIS as being consistent with the Public Review Draft of the PUC DP (May 2002), as well as the current PUC DP adopted in 1990.

92. Our concerns, questions and comments focus on the proposed BRT Alternative. Our specific concerns include, but are not limited to, the following: absence of information and location of impacts on registered historic sites, landscapes, parklands, and ancient burial sites;

Response: Historic properties (historic and archaeological sites), viewplanes (landscapes) and parklands at or near the project area are identified and impacts to these resources discussed in Chapters 3 and 5 of the MIS/DEIS and FEIS.

93. Our concerns, questions and comments focus on the proposed BRT Alternative. Our specific concerns include, but are not limited to, the following: incomplete and questionable community involvement and consensus in recommending specific components, facilities, and routes for the BRT Alternative;

Response: See response to comment #36.

94. Our concerns, questions and comments focus on the proposed BRT Alternative. Our specific concerns include, but are not limited to, the following: absence of traffic testing for cumulative traffic impacts;

Response: See response to comment #22.

95. Our concerns, questions and comments focus on the proposed BRT Alternative. Our specific concerns include, but are not limited to, the following: public and private circulator transportation, service and delivery operations and traffic impacts;

Response: Through community outreach efforts including working with members of the Hawaii Transportation Association which represents private freight and passenger carriers, the subarea Working Groups, the Waikiki Improvement Association, and others, the City has developed a plan which minimizes direct impacts on passenger and freight loading zones, and, in the event of unavoidable adverse impacts, identifies alternate loading locations for all businesses along the BRT route. There will not be any measurable impact on businesses resulting from the loss of any loading zones. The impacts of the BRT on traffic congestion in Waikiki are shown in Table 4.2-7 of the FEIS.

96. Our concerns, questions and comments focus on the proposed BRT Alternative. Our specific concerns include, but are not limited to, the following: major infrastructure and utility impacts;

Response: See response to comment #39.

97. Our concerns, questions and comments focus on the proposed BRT Alternative. Our specific concerns include, but are not limited to, the following: absence of defined and proven technology and associated cumulative capital costs and operations subsidies;

Response: See responses to comments #26, #54, and #63.

98. Our concerns, questions and comments focus on the proposed BRT Alternative. Our specific concerns include, but are not limited to, the following: absence of ancillary facilities descriptions, locations, linkages and impacts on surrounding communities;

Response: The FEIS includes information such as descriptions, linkages and impacts of the ancillary facilities such as transit centers and traction power supply stations associated with the project. These facilities are described in FEIS Chapter 2 and their impacts are discussed in Chapters 3, 4, and 5.

99. Our concerns, questions and comments focus on the proposed BRT Alternative. Our specific concerns include, but are not limited to, the following: compromised present quality of life and "Hawaiian Sense of Place", e.g., destruction and/or adverse impact to scenic viewplanes, historic landscapes, and Hawaiian burials to provide for embedded rapid transit infrastructure, utilities and facilities;

Response: The Refined LPA, including its transit stops, will be designed collaboratively with the community. Transit stops can be open and contextual; substations can be placed and designed so that they will be unobtrusive, and integrated with the surrounding context. Community, neighborhood, historic, parklands, and visual effects are addressed in Chapter 5 of the FEIS.

100. Our concerns, questions and comments focus on the proposed BRT Alternative. Our specific concerns include, but are not limited to, the following: incomplete expansion and improvement of the present Transportation Service Management program to its fullest potential, including the hub-and-spoke circulator system, express and articulated vehicles, dedicated freeway "zipper" lanes, and public and private ridership incentives, prior to any consideration of an embedded rapid transit alternative.

Response: The Refined LPA described in the MIS/DEIS and FEIS does indeed include implementing a hub-and-spoke bus network, using express and articulated vehicles, and using the existing dedicated "zipper" lane. The Refined LPA also includes Transportation Demand Management (TDM) measures to reduce or shift the time of travel by private automobiles.

101. The Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board opposes such a high-capacity transit corridor, peripheral facilities and ancillary infrastructure that will adversely or inappropriately impact Waikiki shoreline viewplanes, historic sites and landscapes, parklands, internal traffic patterns, visitor center support services, non-subsidized private transportation carriers, surrounding communities and neighborhoods, and the "Hawaiian Sense of Place".

Response: See responses to comments #23, #27, #59, #67, #70, #72, #76, #79, #80, and #82.

102. We question the rationale behind promoting in-town fixed rapid transit to replace more convenient and flexible circulator systems. Honolulu has a nationally recognized bus system, and the City administration must continue to maintain and maximize this resource to its fullest potential, including but not limited to flexible in-town circulators; express-bus, zipper-lane, and alternative-energy upgrades; and ridership incentives.

Response: See response to comment #86.

103. In conclusion, the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board rejects the proposed embedded transit system planned between Middle Street and Kapahulu Avenue.

Ms. Karen Ah Mai  
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November 13, 2002

*Instead, we strongly advocate the TSM Alternative, as the Preferred Alternative for the Primary Corridor Transportation Project, and support the best efforts of the City expedite and fund your commitment to expand and maintain the TSM program to ensure that it is efficient, cost-effective and reliable.*

**Response:** Comment noted. It states the commenter's preference for a LPA.

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director



McCULLY/MOILIILI NEIGHBORHOOD BOARD NO. 8

615 KAPALANI BOULEVARD • CITY HALL, ROOM 408 • HONOLULU, HAWAII 96813

**THE POSITION OF THE McCULLY-MOILIILI NEIGHBORHOOD BOARD NO. 8  
ON THE TRANSPORTATION PLAN**

The McCully-Moiliili Neighborhood Board No. 8 submits the following comments regarding the proposed Transportation Plan to the City Council of Honolulu and the City Administration.

1. The proposed dedicated fixed tram routes through McCully-Moiliili as communicated by the City Administration via the Department of Transportation Services as the preferred route voiced by McCully-Moiliili residents during the Transit 2K community meetings were never supported by participants from our neighborhood. We do not understand the basis for this statement by the City Administration via the Department of Transportation Services. We never supported a route up University Avenue or down Kapalani Boulevard.
2. The Major Investment Study Draft Environmental Impact Statement MIS/DEIS is deficient in its economic analysis on alternative modes of transportation and its impact on private transportation systems. The Board takes a cautious approach in supporting a transportation monopoly.
3. We question the logic and arguments presented for an in-town rapid transit system supported by a hub and spoke bus system to a redesigned Middle Street terminus rather than a rapid transit system from the outlying country areas to a Middle Street terminus that would connect riders to bus express into the urban core.
4. Due to conflicting statistical information, we question the immediate necessity to make a decision on establishing a dedicated fixed route system.
5. We question whether the City has maximized the potential of the current bus system. We are pleased that the City is investigating alternative forms of energy for the BRT; likewise we suggest that buses in the future could be powered by photovoltaic fuel cells in the future.
6. We believe the MIS/DEIS does not adequately address 21st Century communication systems and its impact on a work force traditionally reliant on transportation to and from an established work center.
7. The City states that the transportation system will dictate future development for the PUC. We believe the MIS/DEIS does not adequately address social and environmental impacts related to development and growth. We believe transportation, planning, zoning and water resource allocation are inseparable in planning urban growth; and thus believe that an EIS should be prepared with these four components as a sum of the total rather than as individual denominations. We believe segmenting these four components, while perhaps legal under the law, is ultimately detrimental in determining our vision for the future; and ensuring the quality of life we desire for our community of McCully-Moiliili.
8. We believe that transportation should be developed to help level the economic playing field for small land owners and businesses. We do not believe the Honolulu transportation system should subsidize large investors and land owners at the expense of Hawaii's taxpayer.
9. We recommend a transportation study be undertaken by an outside independent company on the proposed BRT and the MIS/DEIS.
10. We recommend the development of an urban Honolulu traffic management plan before proceeding with any other transportation system.



**MCCULLY/MOILIILI NEIGHBORHOOD BOARD NO. 8**

665 KEELEWOOD CONVENTOR • CITY HALL, ROOM 408 • HONOLULU, HAWAII 96813

11. We note that the general public has been given very little time to fully study and comprehend the enormity of the proposals, especially in its impact to development as proposed in the City's Draft Primary Urban Center Development Plan.

12. There are too many unanswered questions for the Board to take the next step in supporting a billion dollar BRT transportation venture.

13. The McCully-Moiliili Neighborhood Board support further studies to analyze financial, social and environmental impacts.

The Board unanimously adopted this position at its regular meeting on Thursday, November 2, 2000.

*John Kato as*  
John Kato, Chairperson

November 13, 2000

Ms. Cheryl Soon  
Department of Transportation Services  
City and County of Honolulu  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813

Mr. Robert Bramen  
Parsons, Brinckerhoff, Quade & Douglas, Inc.  
Pacific Tower, Suite 3000  
1001 Bishop Street  
Honolulu, Hawaii 96813

Ms. Donna Turchie  
Senior Transportation Representative  
Federal Transit Administration, Region IX  
U.S. Department of Transportation  
201 Mission Street, Suite 2210  
San Francisco, California 94105-1839

Ms. Genevieve Salmonson, Director  
Office of Environmental Quality Control  
State Office Tower, Suite 702  
235 South Beretania Street  
Honolulu, Hawaii 96813

Subject: Primary Corridor Transportation Project Major Investment Study/Draft Environmental Impact Statement

Dear Ms. Soon, Mr. Bramen, Mr. Turchie and Ms. Salmonson:

Enclosed is the McCully-Moiliili Neighborhood Board No. 8 response to the Primary Corridor Transportation Project Major Investment Study/Draft Environmental Impact Statement. This response was transmitted via facsimile to the City Department of Transportation Services on November 6, 2000 from the Neighborhood Commission Office by the McCully-Moiliili Neighborhood Board's neighborhood assistant.

In addition, the McCully-Moiliili Neighborhood Board No. 8 has taken a position to support further expansion of the current bus transportation system to serve the rural communities and the primary urban center prior to advancing a Bus Rapid Transit or any other dedicated fixed route system.

We particularly note that McCully-Moiliili residents never supported the proposed BRT route or any other dedicated routes up Kapiolani Boulevard and University Avenue during the O'ahu Trans2K meetings. Neither has McCully-Moiliili residents supported the proposed routes during other community planning and transportation meetings.

We are very concerned of the cumulative impacts of the proposed Primary Urban Center Development Plan, Transportation Plan and the Integrated Resource Plan for Water on the McCully-Moiliili neighborhood and the entire Ala Wai Canal Watershed Lowlands from Sheridan to Kapiolani. We strongly believe that good planning needs to address planning, zoning, transportation and water as a whole rather than segmented into individual denominations.

Therefore, the McCully-Moiliili Neighborhood Board No. 8 does not support the proposed BRT and will present our concerns during City Council discussion on Resolution 00-249, "Selection of a Locally Preferred Alternative for the Primary Corridor Transportation Project."



City of Honolulu  
City's Neighborhood Board System - Established 1973

CITY COUNCIL TRANSPORTATION COMMITTEE MEETING

November 14, 2000

Subject: RESOLUTION 00-249 SELECTION OF A LOCALLY PREFERRED ALTERNATIVE FOR THE PRIMARY CORRIDOR TRANSPORTATION PROJECT

Aloha Chairperson Bainum and Members of the City Council Transportation Committee:

My name is Charles Tonigoe and I am here on behalf of the McCully-Mo'ili'i Neighborhood Board No. 8.

We are pleased to inform you that McCully-Mo'ili'i Neighborhood Board No. 8 has taken a position to support further expansion of the current bus transportation system to serve the rural communities and the primary urban center prior to advancing a Bus Rapid Transit or any other dedicated fixed route system.

Attached for your information are comments unanimously supported by the McCully-Mo'ili'i Neighborhood Board No. 8.

We particularly note that McCully-Mo'ili'i residents never supported the proposed BRT route or any other dedicated routes up Kapi'olani Boulevard and University Avenue during the O'ahu TranszK meetings. Neither has McCully-Mo'ili'i residents supported the proposed routes during other community planning and transportation meetings.

We are very concerned of the cumulative impacts of the proposed Primary Urban Center Development Plan, Transportation Plan and the Integrated Resource Plan for Water on the McCully-Mo'ili'i neighborhood and the entire Ala Wai Canal Watershed Lowlands from Sheridan to Kapahulu. There lacks correlation between the Transportation Plan and the proposed Primary Urban Center Development Plan. We strongly believe that good planning needs to address planning, zoning, transportation and water as a whole rather than segmented into individual denominations.

Therefore, the McCully-Mo'ili'i Neighborhood Board No. 8 does not support the proposed BRT and will present our concerns during City Council discussion on Resolution 00-249, "Selection of a Locally Preferred Alternative for the Primary Corridor Transportation Project".

Thank you for the opportunity to present McCully-Mo'ili'i Neighborhood Board No. 8's position and we look forward to your response on our concerns and comments.

Ms. Cheryl Soon, Mr. Robert Braman  
Ms. Donna Turble, Ms. Genevieve Salmonson  
November 13, 2000  
Page 2

Thank you for the opportunity to present McCully-Mo'ili'i Neighborhood Board No. 8's position and we look forward to your response on our concerns and comments.

Sincerely,

*John Katz*

John Katz, Chairperson  
McCully-Mo'ili'i Neighborhood Board No. 8

- cc: Federal Highway Administration
- O'ahu Metropolitan Planning Organization
- Honolulu City Council
- State Senators and Representatives
- O'ahu Neighborhood Boards
- Community Organizations
- Transportation Companies

**POSITION OF THE  
McCULLY-MO'II'I NEIGHBORHOOD BOARD NO. 8  
THE  
TRANSPORTATION PLAN**

November 14, 2000

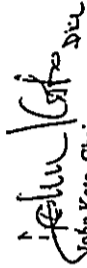
The McCully-Mo'ii'i Neighborhood Board No. 8 submits the following comments regarding the proposed Transportation Plan to the City Council of Honolulu and the City Administration.

1. The proposed dedicated fixed train routes through McCully-Mo'ii'i as communicated by the City Administration via the Department of Transportation Services as the preferred route voiced by McCully-Mo'ii'i residents during the Trans 2K community meetings were never supported by participants from our neighborhood. We do not understand the basis for this statement by the City Administration via the Department of Transportation Services.
2. The Major Investment Study Draft Environmental Impact Statement MIS/DEIS is deficient in its economic analysis on alternative modes of transportation and its impact on private transportation systems. The Board takes a cautious approach in supporting a transportation monopoly.
3. We question the logic and arguments presented for an in-town fixed Bus Rapid Transit system supported by a hub and spoke bus system to a redesigned Middle Street terminus. We suggest that a rapid transit system from the outlying county urban core should be open to further exploration and discussion.
4. Due to conflicting statistical information, we question the immediate necessity to make a decision on establishing a dedicated fixed route system.
5. We question whether the City has maximized the potential of the current bus system. We are pleased that the City is investigating alternative forms of energy for the BRT; likewise we suggest that buses in the future could be powered by photo-voltaic and fuel cells.
6. We believe the MIS/DEIS does not adequately address 21st Century communication systems and its impact on a work force traditionally reliant on transportation to and from an established work center.
7. The City states that the transportation system will dictate future development for the PUC. We believe the MIS/DEIS does not adequately address social and environmental impacts related to development and growth. We believe transportation, planning, zoning and water resource allocation are inseparable in planning urban growth; and thus believe that an EIS should be prepared with these

four components as a sum of the total rather than as individual denominations. We believe segmenting these four components, while perhaps legal under the law, is ultimately detrimental in determining our vision for the future; and ensuring the quality of life we desire for our community of McCully-Mo'ii'i.

8. We believe that transportation should be developed to help level the economic playing field for small landowners and businesses. We do not believe the Honolulu transportation system should subsidize large investors and landowners at the expense of Hawaii's taxpayer such as the major developments planned for Kapi'olani Boulevard.
9. We recommend that a study be undertaken by an independent company for the proposed BRT and the MIS/DEIS.
10. We recommend the development of a urban Honolulu traffic management plan before proceeding with a fixed rail transportation system.
11. We note that the general public has been given very little time to fully study and comprehend the enormity of the proposals; especially in its impact to development as proposed in the City's Draft Primary Urban Center Development Plan.
12. There are too many unanswered questions for the Board to take the next step in supporting a billion dollar BRT transportation venture.
13. The McCully-Mo'ii'i Neighborhood Board support further studies to analyze financial, social and environmental impacts for fixed rail transportation systems.

Adopted unanimously by the McCully-Mo'ii'i Neighborhood Board No. 8 on November 2, 2000.

  
John Kato, Chairperson

McCully-Mo'ii'i Neighborhood Board No. 8.

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**

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KEREMAT HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE "KEO" MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD11/00-05417R  
TPD11/00-05504R

Mr. John Kato, Chairperson  
McCully/Moai Neighborhood Board No. 8  
Neighborhood Commission  
City Hall, Room 400  
Honolulu, Hawaii 96813

Dear Mr. Kato:

Subject: Primary Corridor Transportation Project

This is in response to your November 2, 2000 letter, your November 13, 2000 letter, and your November 14, 2000 position paper and resolution for the selection of a Locally Preferred Alternative regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. The proposed dedicated fixed tram routes through McCully-Moai as communicated by the City Administration via the Department of Transportation Services as the preferred route voiced by McCully-Moai residents during the Trans 2K community meetings were never supported by participants from our neighborhood. We do not understand the basis for this statement by the Administration via the Department of Transportation Services. We never supported a route up University Avenue or down Kapolei Boulevard.

**Response:** Comment noted. It is a statement of opinion.

2. The Major Investment Study Draft Environmental Impact Statement MIS/DEIS is deficient in its economic analysis on alternative modes of transportation and its impact on private transportation systems. The Board takes a cautious approach in supporting a transportation monopoly.

**Response:** Today, public transit service is only provided on Kuliou Avenue (both directions). The BRT will provide high frequency service on Kalakaua and Kuliou Avenues, thus increasing the area directly served by public transit. Based on the analysis of the potential impacts on private transportation providers as discussed in Section 5.1.5 of the FEIS, the private transportation providers will not be significantly adversely affected by the Refined LPA since they serve different travel markets. Even with the BRT, private operators will still be needed to serve the tourist travel market.

The BRT routings, stop locations and other features are designed to serve trips by Oahu residents when going to-and-from home, work, school, shopping and other purposes. It is not designed to serve the tourist market as are the private bus operations in Honolulu. Unlike the private sector buses, the BRT will not pick passengers up at their hotels and take them on various scenic tours. It will not take them to-and-from the Airport. It will not take them to-and-from their hotels and the

Mr. John Kato  
Page 2  
November 13, 2002

Convention Center. It will not pick them up at the cruise ship terminal and carry them and their bags directly to their hotels. And unlike the private shuttles it is not designed to operate in a loop that only goes between the Waikiki hotels and various tourist sites of interest.

Some tourists may use BRT because it does serve some of the same destinations that the tourists want to go to, but the BRT serves these places because they are also major employment sites or sites that attract local residents, such as shopping centers or restaurants. The tourists expected to use the public transit system with the BRT is forecast to be no greater proportionally than today (i.e., less than 10-15 percent of total daily boardings).

3. We question the logic and arguments presented for an in-town rapid transit system supported by a hub and spoke bus system to a redesigned Middle Street terminus rather than a rapid transit bus expresses into the urban core.

**Response:** The Primary Corridor Transportation Project (PCTP) includes a Regional BRT component that services the area from Kapolei to Middle Street by providing a system of express lanes, extension of the zipper lane and addition of a P.M. zipper lane from Kapolei to Middle Street. From the Middle Street Transit Center, riders would have the option of continuing into town using the In-Town BRT bus lanes or transferring to other buses servicing other destinations in the urban core.

In the Refined LPA, the BRT operations plan has been revised to permit many of the regional buses to continue into town using the In-Town BRT bus lanes rather than turning back at Middle Street and forcing passengers to transfer. This will result in a faster, one vehicle trip for many riders. The Regional and In-Town BRT makes efficient use of the already in-place transportation infrastructure so that it can carry more people without the major widening or elevated structures that would be required with a separate rapid transit system.

4. Due to conflicting statistical information, we question the immediate necessity to make a decision on establishing a dedicated fixed route system.

**Response:** Comment noted. It is unclear what statistical information is being referenced.

5. We question whether the City has maximized the potential of the current bus system. We are pleased that the City is investigating alternative forms of energy for the BRT; likewise we suggest that buses in the future could be powered by photovoltaic fuel cells in the future.

**Response:** DTS continually reevaluates the level of service provided by the existing bus system and has begun to reconfigure the existing radial network of bus routes to a hub-and-spoke configuration. An integral part of the Refined LPA is a hub-and-spoke bus network that would connect with the Regional and In-Town BRT systems. Integrating the hub-and-spoke network with a fast, high-capacity transit system spanning the primary transportation corridor. The evolution of alternative technologies including fuel cells will continue to be monitored. One of the advantages of BRT compared to rail is its ability to adapt to changes in traction power technology over time.

6. We believe the MIS/DEIS does not adequately address 21st Century communication systems and its impact on a work force traditionally reliant on transportation to and from an established work center.



**Response:** The concept of telecommuting has been discussed for decades and yet has had no noticeable impact on travel demand to date. Even if telecommuting increases significantly in the future it would not eliminate the need for the Refined LPA.

7. The City states that the transportation system will dictate future development for the PUC. We believe the MISDEIS does not adequately address social and environmental impacts related to the development and growth. We believe transportation, planning, zoning and water resource allocation are inseparable in planning urban growth; and thus believe that an EIS should be prepared for these four components as a sum of the total rather than as individual denominations. We believe segmenting these four components, while perhaps legal under the law, is ultimately detrimental in determining our vision for the future; and ensuring the quality of life we desire for our community of McCully-Moanalua.

**Response:** The City has not said that the transportation system will dictate future development for the PUC. What has been stated in the MISDEIS and the FEIS is that a transportation system such as the Refined LPA could help shape where development occurs when other factors such as zoning, land use regulations, infrastructure, and market factors, are also in place. While there are relationships clearly between transportation, land use, zoning, water and other infrastructure, the planning for each of these elements does not have to occur simultaneously for there to be proper balance between these elements. Indeed in almost all cities these are separate planning activities that are coordinated but are under the purview of separate departments or agencies. Plans are dynamic, not static elements that can be frozen in time. They must be continually updated and revised periodically as new information is available. This updating process allows for the different elements to be brought in balance on an on-going basis.

8. We believe that transportation should be developed to help level the economic playing field for small land owners and businesses. We do not believe the Honolulu transportation system should subsidize large investors and land owners at the expense of Hawaii's taxpayer.

**Response:** Comment noted. None of the transit alternatives including the Refined LPA reflect any bias either in favor or against small vs. large land owners.

9. We recommend a transportation study be undertaken by an outside independent company on the proposed BRT and the MISDEIS.

**Response:** The Federal Transit Administration (FTA) is responsible for reviewing all new proposed transit systems before receiving federal funding. They often use independent consultants to review the proposals by applicants. Also, once a project is approved to enter the final design phase, an independent consultant is selected by FTA to perform project management oversight.

10. We recommend the development of an urban Honolulu traffic management plan before proceeding with any other transportation system.

**Response:** The Refined LPA is only one element in a comprehensive set of multi-modal improvements planned as part of the Oahu Regional Transportation Plan (ORTP 2025).

11. We note that the general public has been given very little time to fully study and comprehend the enormity of the proposal; especially in its impact to development as proposed in the City's Draft Primary Urban Center Development Plan.

**Response:** There are required minimum public review periods within the environmental review process. If you find that these periods, such as those provided for the MISDEIS and SDEIS, are not sufficient for your review, we encourage you to request an extension before the deadline. For the MISDEIS, DTS provided an extension of time for public review and comments.

12. There are too many unanswered questions for the Board to take the next step in supporting a billion dollar BRT transportation venture.

**Response:** Comment noted. It is a statement of opinion.

13. The McCully-Moanalua Neighborhood Board support further studies to analyze financial, social and environmental impacts.

**Response:** Since the MISDEIS was published, additional environmental studies were conducted. A cultural practices (Act 50), tree survey, hazardous materials survey, and archaeological survey have been completed. In addition, a Supplemental Draft Environmental Impact Statement (SDEIS) was prepared for the Kakaio Makai branch, Pensacola Street alignment change, and Aoha Stadium (Luapele Drive) ramp.

14. The McCully-Moanalua Neighborhood Board No. 8 has taken a position to support further expansion of the current bus transportation system to serve the rural communities and the primary urban center prior to advancing a Bus Rapid Transit or any other dedicated fixed route system.

**Response:** Comment noted. It is a statement of the commenter's preference for a LPA.

15. We particularly note that McCully-Moanalua residents never supported the proposed BRT route or any other dedicated routes up Kapiolani Boulevard and University Avenue during the Oahu Transit meetings. Neither has McCully-Moanalua residents supported the proposed routes during other community planning and transportation meetings.

**Response:** Comment noted. It is a statement of opinion.

16. We are very concerned of the cumulative impacts of the proposed Primary Urban Center Development Plan, Transportation Plan and the Integrated Resource Plan for Water on the McCully-Moanalua neighborhood and the entire Ala Wai Canal Watershed Lowlands from Sharihan to Kapiolani. We strongly believe that good planning needs to address planning, zoning, transportation and water as a whole rather than segmented into individual denominations.

**Response:** While there are relationships clearly between transportation, land use, zoning, water and other infrastructure, the planning for each of these elements does not have to occur simultaneously for there to be proper balance between these elements. Indeed in almost all cities these are separate planning activities that are coordinated but are under the purview of separate departments or agencies. Plans are dynamic, not static elements that can be frozen in time. They must be continually updated and revised periodically as new information is available. This updating process allows for the different elements to be brought in balance on an on-going basis.

DTS agrees that cumulative impacts should be considered in transportation planning. The EIS for the Primary Corridor Transportation Project addresses the potential cumulative impacts including water quality. Impacts on water resources can result from various urban development projects planned within the Ala Wai Canal watershed and other watersheds, respectively. Because this

project and other transportation projects are intended to enhance transit use and thereby reduce reliance on private vehicles, the cumulative effect of these planned projects would be to reduce pollution caused by automobiles over time.

17. Therefore, the McCully-Moaiwi Neighborhood Board No. 8 does not support the proposed BRT and will present our concerns during City Council discussion on Resolution 00-249, "Selection of a Locally Preferred Alternative for the Primary Corridor Transportation Project."

**Response:** Comment noted. It states the commenter's preference for a LPA.

18. We are pleased to inform you that McCully - Moaiwi Neighborhood Board No. 8 has taken a position to support further expansion of the current bus transportation system to serve the rural communities and the primary urban center prior to advancing a Bus Rapid Transit or any other dedicated fixed route system.

**Response:** Comment noted. It states the commenter's preference for a LPA.

19. We particularly note that McCully-Moaiwi residents never supported the proposed BRT route or any other dedicated routes up Kapiolani Boulevard and University Avenue during the Oahu Transit 2K meetings. Neither has McCully-Moaiwi residents supported the proposed routes during other community planning and transportation meetings.

**Response:** Comment noted. It is a statement of opinion.

20. We are very concerned of the cumulative impacts of the proposed Primary Urban Center Development Plan, Transportation Plan and the Integrated Resource Plan for Water on the McCully-Moaiwi neighborhood and the entire Ala Wai Canal Watershed Lowlands from Sheridan to Kapiolani. There lacks correlation between the Transportation Plan and the proposed Primary Urban Center Development Plan. We strongly believe that good planning needs to address planning, zoning, transportation and water as a whole rather than segmented into individual denominations.

**Response:** DTS agrees that cumulative impacts should be considered in transportation planning. The EIS for the Primary Corridor Transportation Project addresses the potential cumulative impacts including water quality. Impacts on water resources can result from various urban development projects planned within the Ala Wai Canal watershed and other watersheds, respectively. Because this project and other transportation projects are intended to enhance transit use and thereby reduce reliance on private vehicles, the cumulative effect of these planned projects would be to reduce pollution caused by automobiles over time.

21. Therefore, the McCully-Moaiwi Neighborhood Board No. 8 does not support the proposed BRT and will present our concerns during City Council discussion on Resolution 00-249, "Selection of a Locally Preferred Alternative for the Primary Corridor Transportation Project."

**Response:** Comment noted. It is a statement of the commenter's preference for an LPA.

22. The proposed dedicated fixed tram routes through McCully-Moaiwi as communicated by the City Administration via the Department of Transportation Services as the preferred route valued by

McCully-Moaiwi residents during the Transit 2K community meetings were never supported by participants from our neighborhood. We do not understand the basis for this statement by the City Administration via the Department of Transportation Services.

**Response:** Comment noted. It is a statement of opinion.

23. The Major Investment Study Draft Environmental Impact Statement MIS/DEIS is deficient in its economic analysis on alternative modes of transportation and its impact on private transportation systems. The Board takes a cautious approach in supporting a transportation monopoly.

**Response:** See response to comment #2.

24. We question the logic and arguments presented for an in-town fixed Bus Rapid Transit system supported by a hub and spoke bus system to a redesigned Middle Street terminus. We suggest that a rapid transit system from the outlying country areas to a Middle Street terminus that would connect riders to bus expresses into the urban core should be open to further exploration and discussion.

**Response:** See response to comment #3.

25. Due to conflicting statistical information, we question the immediate necessity to make a decision on establishing a dedicated fixed route system.

**Response:** Comment noted. It is unclear what statistical information is being referred to.

26. We question whether the City has maximized the potential of the current bus system. We are pleased that the City is investigating alternative forms of energy for the BRT; likewise we suggest that buses in the future could be powered by photo-voltaic and fuel cells.

**Response:** See response to comment #5.

27. We believe the MIS/DEIS does not adequately address 21<sup>st</sup> Century communication systems and its impact on a work force traditionally reliant on transportation to and from an established work center.

**Response:** See response to comment #6.

28. The City states that the transportation system will dictate future development for the PUC. We believe the MIS/DEIS does not adequately address social and environmental impacts related to development and growth. We believe transportation, planning, zoning and water resource allocation are inseparable in planning urban growth; and thus believe that an EIS should be prepared with these four components as a sum of the total rather than as individual denominations. We believe segmenting these four components, while perhaps legal under the law, is ultimately detrimental in determining our vision for the future; and ensuring the quality of life we desire for our community of McCully-Moaiwi.

**Response:** See response to comment #7.



Mr. John Kato  
Page 7  
November 13, 2002

29. We believe that transportation should be developed to help level the economic playing field for small landowners and businesses. We do not believe the Honolulu transportation system should subsidize large investors and landowners at the expense of Hawaii's taxpayer such as the major developments planned for Kapolei Boulevard.

Response: See response to comment #8.

30. We recommend that a transportation study be undertaken by an independent company for the proposed BRT and MISDEIS.

Response: See response to comment #9.

31. We recommend the development of an urban Honolulu traffic management plan before proceeding with a fixed rail transportation system.

Response: See response to comment #10.

32. We note that the general public has been given very little time to fully study and comprehend the enormity of the proposal, especially in its impact to development as proposed in the City's Draft Primary Urban Center Development Plan.

Response: See response to comment #11.

33. There are too many unanswered questions for the Board to take the next step in supporting a billion dollar BRT transportation venture.

Response: Comment noted. It is a statement of position.

34. The McCully-Moai Neighborhood Board support further studies to analyze financial, social and environmental impacts for fixed rail transportation systems.

Response: See response to comment #12.

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

October 20, 2000

City Council  
City and County of Honolulu

At our October meeting after numerous meetings and briefings the Makiki/Lower Punchbowl, Tantalus Neighborhood Board, #10 voted for the following position with regard to the Primary Corridor DEIS. We recommend the TSM alternative with the addition of expanded zipper lanes, new access ramps and express lanes on H-1. We specifically oppose exclusive or semi-exclusive transit lanes on existing streets between Middle Street and Waikiki / University of Hawaii.

We believe that land use planning should proceed and not follow transportation planning. Growth forecasts are not supported in the plan, or by reference, and follow some vague but unstated goals. There is no community consensus that states growth in the PUC is desired. Existing growth plans for Kapolei and the changes in work habits due to technology changes are not factored into the study.

The flaw in the BRT plan is that it superimposes through traffic on existing local traffic. In comparing this to the elevated light rail proposed in 1992, we have the same proposal with no grade-separated traffic. We now use existing streets for the mass transit. This is not an improvement.

John Steelquist,  
Chair



Oahu's Neighborhood Board System - Established 1973

Makiki/Lower Punchbowl/Tantalus  
Neighborhood Board

Primary Corridor Transportation DEIS

THREE TRANSPORTATION ALTERNATIVES

- 1) NO-BUILD-currently programmed transportation projects
- 2) HUB-&-SPOKE BUS NETWORK (TSM)
- 3) BUS RAPID TRANSIT (BRT) -dedicated (exclusive) lanes

BASIC INFORMATION

- 1) BUS RIDERSHIP HAS GONE DOWN
- 2) OAHU VEHICLE REGISTRATION HAS GONE DOWN
- 3) DEIS USED OLD PROJECTED 2025 POPULATION FIGURE
- 4) DEIS PROJECTED A 74% RIDERSHIP INCREASE FOR 2025

DEDICATED (EXCLUSIVE) LANES

- 1) 2 DEDICATED + STATION + 2 NON-EXPRESS BUS LANES ON KAPIOLANI BLVD. ALSO ON ALA MOANA BLVD
- 2) DIVERT TRAFFIC TO OTHER MAIN & NEIGHBORHOOD STS.
- 3) NEGATIVELY IMPACT NORTH/SOUTH STREETS LIKE WARD, PIIKOI, PENSACOLA, KEEAUMOKU & UNIVERSITY
- 4) NEGATIVELY IMPACT SALESPERSONS, DELIVERY & SERVICES PERSONS
- 5) LARGE DEVELOPMENTS LIKE WAL-MART & EXPANDED ALA MOANA CENTER

FACTORS NOT CONSIDERED IN THE 2025 DEIS

- 1) DEIS ASSUME PRESENT CONDITIONS FOR 2025, NOT FUTURE POTENTIAL CONDITIONS
- 2) CITY'S VISION FOR THE IN-TOWN GROWTH DEVELOPMENT
- 3) POTENTIAL GROWTH IN EWA & CENTRAL OAHU
- 4) ALTER WORK & SOCIAL HABITS OVER THE NEXT 25 YEARS
- 5) CHANGES IN VEHICLES, THEIR TOTALS & SUPPORT FIRMS

COSTS AND TAXES

- 1) ESTIMATING A BRT SYSTEM THAT HASN'T BEEN BUILT
- 2) DEIS ESTIMATES REQUIRES MORE REAL ESTATE TAXES
- 3) CAN HECO DELIVER THE ELECTRICITY, HOW & COST?

SENIOR CITIZENS

- 1) SENIORS TEND TO USE NON-EXPRESS BUSES RATHER THAN EXPRESS BUSES WITH 1/4 TO 1/2 MILE STOP

PAGE 2 - CONTINUED

CITY'S DTS STATED THAT IT WANTED TO ESTABLISH THE DEDICATED LANES AS SOON AS POSSIBLE

MAKIKI NEIGHBORHOOD BOARD ON OCT. 19TH PASSED THE FOLLOWING MOTIONS:

- 1) THE BOARD WAS AGAINST THE BUS RAPID SYSTEM WITH DEDICATED LANES. (11-0-1)
- 2) THE BOARD WAS FOR THE HUB-&-SPOKE NETWORK (TSM) WITHOUT DEDICATED LANES. (11-1-0)



**MAKIKI/LOWER PUNCHBOWL/TANIALUS NEIGHBORHOOD BOARD NO. 10**

4th NEIGHBORHOOD COMMISSION • CITY HALL, ROOM 408 • HONOLULU, HAWAII 96813

**DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU**

510 SOUTH KING STREET, 3RD FLOOR • HONOLULU, HAWAII 96813  
TELEPHONE: (808) 523-4119 • FAX: (808) 522-4130 • CITYWEBSITE: WWW.CC.HONOLULU.HI



JEFFREY HARRIS  
DIRECTOR

March 22, 2002

CHERYL D. SOON  
DIRECTOR

Ms. Cheryl Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

GEORGE TUCKER WILSON  
MONTHLY MEETING  
TP3/02-01177R

April 12, 2002

Mr. John Steelquist, Chair  
Makiki/Lower Punchbowl/Tanialus  
Neighborhood Board No. 10  
c/o Neighborhood Commission  
City Hall, Room 400  
Honolulu, Hawaii 96813

Dear Mr. Steelquist:

Subject: Primary Corridor Transportation Project

This responds to your March 22, 2002 letter related to the Makiki/Lower Punchbowl/Tanialus Neighborhood Board No. 10 request that a public meeting be held on the Supplemental Draft Environmental Impact Statement (SDEIS) for the subject project.

This is to inform you that a public hearing has been scheduled to receive comments on the SDEIS and the potential project impacts. The public hearing will be held on Saturday, April 20, 2002 at the Hawaii Convention Center, Rooms 319A & B, 1801 Kalakaua Avenue.

There will be an open house from 10:00 a.m. until 11:00 a.m., prior to the receiving of public testimony. Displays and other project information will be available to provide attendees with information on the proposed project. During this time, project staff will be available to answer any questions regarding the SDEIS.

The project presentation will begin at 11:00 a.m. and will be followed by public testimony on the project. Persons wishing to speak at the hearing should sign up at the hearing site between 10:00 a.m. and 11:00 a.m., prior to the start of the project presentation.

Should you have any questions regarding the subject project, please contact Kenneth Hameyasu at 527-6978.

Sincerely,

*Cheryl D. Soon*

CHERYL D. SOON  
Director

Dear Ms. Soon:

The Makiki/Tanialus/Lower Punchbowl Neighborhood Board No. 10 voted unanimously (9-0) on March 21, 2002 to request the Department of Transportation Services to hold a public meeting on the Supplemental Draft Environmental Impact Statement - Primary Corridor Transportation Project (PCTP) during its review period. The meeting in the middle of April would be most appropriate to allow the public to prepare their comments for submission by May 7, 2002.

Also, the public should be permitted to ask questions on draft EIS and give comments at their meeting. This procedure was followed at a public meeting for the Major Investment Study/DEIS for PCTP.

This meeting would continue your excellent citizens participation for this project.

Sincerely,

*John Steelquist*  
John Steelquist, Chair

Cc: Councilmember Ann Kobayashi  
Councilmember Duke Baimun  
PUC Neighborhood Board Presidents  
file



Oahu's Neighborhood Board System - Established 1973



MAKIKI/LOWER PUNCHBOWL/TANTALUS NEIGHBORHOOD BOARD NO. 10

APR 20 2002

44 NEIGHBORHOOD COMMISSION • CITY HALL, ROOM 408 • HONOLULU, HAWAII 96813

April 20, 2002

Ms. Cheryl D. Soon  
 Director  
 Department of Transportation Services  
 City and County of Honolulu  
 650 South King Street, 3rd Floor  
 Honolulu, HI, 96813

The Makiki Neighborhood Board #10 opposes the Bus Rapid Transit (BRT) as currently proposed. It provides a small increase in transportation convenience for a small portion of the Oahu residents and imposes a large transportation inconvenience on a large portion of Oahu residents. The in-town part of the BRT system imposes a through traffic impact on the local in-town circulation without providing a relief or improvement to the in-town circulation. The Primary Urban Core (PUC) hub-and-spoke should be designed and tested before any construction of BRT past Middle Street. Design the in-town circulation first then link it with the Kapolei to Town rapid transit.

The supplemental DEIS states that transportation should "support desired development patterns", but PUC development plan is on hold again. Transportation construction should not precede community approval of the Development Plan.

This is titled a transportation plan, but it is a rapid transit plan. It is a bus plan. It has been written with a very strong bias. The desire to obtain Federal Transportation funds for mass transit seems to be a given. The need for through transit from Kapolei to Waikiki seems to be a given. A real transportation plan should include options such as a serious effort to reduce transportation needs by building the Second City or telecommuting. Will there really be an employment need to go from Kapolei to Waikiki in 2025? Ocean transportation is not mentioned. The shortest route from Kapolei to Downtown or Waikiki is by sea. The ocean doesn't have to be repaved. For a billion dollars we could have a terrific ferry system.

There is a transportation problem, but the current BRT is incomplete and expensive. Honolulu should complete the PUC Development Plan, implement the in-town hub-and-spoke, and more completely analyze the transportation options for the 21st century.

*John A. Steelquist*  
 John Steelquist, Chair



Oahu's Neighborhood Board System - Established 1973



MAKIKI/LOWER PUNCHBOWL/TANTALUS NEIGHBORHOOD BOARD NO. 10

44 NEIGHBORHOOD COMMISSION • CITY HALL, ROOM 408 • HONOLULU, HAWAII 96813

May 7, 2002

Ms. Cheryl D. Soon, Director  
 Department of Transportation Services  
 City and County of Honolulu  
 650 South King Street, 3rd Floor  
 Honolulu, Hawaii 96813

MAY 7 2002

Dear Ms. Soon:

Subject: Comments and Concerns  
 Primary Corridor Transportation Project  
 Supplemental Draft Environmental Impact Statement

The Makiki/Lower Punchbowl/Tantalus Neighborhood Board No. 10 continues to support the TSM alternative over the BRT, even though the City Council has accepted the BRT alternative.

The Board is concerned about the traffic operations on King Street, Kapiolani Blvd., Ala Moana Blvd., and Pensacola Street with the reduced passenger and commercial vehicles on these streets. Motorists will choose to take alternate routes through surrounding communities and neighborhoods. This BRT would move more traffic on to our streets. The SDEIS doesn't address this problem since the SDEIS assumes that people will get out of their vehicles and take the BRT. Some people will stop using their vehicles, but most will continue to drive.

There is also the problem of the mauka/makai streets being blocked at the intersections of the BRT corridors. This will affect traffic all the way up to the H-1 and beyond. SDEIS doesn't cover this problem.

On street parking is planned to decline along the transit corridors because the BRT will be consuming up to two traffic lanes, which will necessitate removing parking spaces as outlined in the SDEIS. Therefore, parking impacts in communities and neighborhoods surrounding BRT transit corridors will be compounded, which is not addressed in the SDEIS.

The Public Transportation System's operating costs for FY 2002 seems to be underestimated based on the actual operating costs for its FY 2001. This raises the question about the system's cash flow analysis for FYs 2003 to 2025 as being underestimated. Will we be increasing the City's debt service and our taxes to pay for this transportation system?

Sincerely,  
*John A. Steelquist*  
 John A. Steelquist, Chair

cc: OECC Ms. Genevieve Salmonson, Director



Oahu's Neighborhood Board System - Established 1973

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
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SEBASTIAN HARRIS  
MAYOR

CHESTER D. SOON  
DIRECTOR  
GEORGE YESOBY MEYLANDO  
DEPUTY DIRECTOR

TPD1200-05937R05938R  
TPD302-01177R  
TPD502-01633R

November 13, 2002

Mr. John Steekquist, Chair  
Makiki/Lower Punchbowl/Tantalus  
Neighborhood Board No. 10  
Neighborhood Commission  
City Hall, Room 400  
Honolulu, Hawaii 96813

Dear Mr. Steekquist:

Subject: Primary Corridor Transportation Project

This responds to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your October 26, 2000 letter, your oral testimony at the October 26, 2000 Special Transportation Committee Meeting, and your summary sheet of comments regarding the MIS/DEIS. Part B responds to your March 22, 2002 letter, your oral testimony at the April 20, 2002 public hearing, your April 20, 2002 letter, and your May 7, 2002 letter regarding the SDEIS.

Part A - MIS/DEIS Comments

1. At the October meeting after numerous meetings and briefings, the Makiki, Lower Punchbowl, Tantalus Neighborhood Board, #10 voted for the following position with regard to the Primary Corridor DEIS. We recommend the TSM alternative with the addition of expanded zipper lanes, new access ramps and express lanes on H-1. We specifically oppose exclusive or semi-exclusive transit lanes on existing streets between Middle Street and Waialae/University of Hawaii.

Response: Comment noted. It states the commenter's preference for a LPA.

2. We believe that land use planning should proceed and not follow transportation planning. Growth forecasts are not supported in the plan, or by reference, and follow some vague but unstated goals. There is no community consensus that states growth in the PUC is desired. Existing growth plans for Kepoiki and the changes in work habits due to technology changes are not factored into the study.

Response: There is no indication of when the updated Primary Urban Center Development Plan (PUC DP) will be adopted by the City Council. The environmental review process of the Primary Corridor Transportation Project (PCTP) cannot be delayed pending this outcome. The In-Town BRT has been designed to support current land uses and future land use patterns, particularly in vacant and underutilized parcels in Kakaako, Iwalei, and near Ala Moana Center and the Convention Center. These are the locations where development is likely to occur with or without

Mr. John Steekquist  
Page 2  
November 13, 2002

the PCTP. Because of this, the Refined LPA has been evaluated in the FEIS as being consistent with the Public Review Draft of the PUC DP (May 2002), as well as the current PUC DP adopted in 1990.

3. The flaw in the BRT plan is that it superimposes through traffic on existing local traffic. In comparing this to the elevated light rail proposed in 1992, we have the same proposal with no grade-separated traffic. We now use existing streets for the mass transit. This is not an improvement.

Response: The BRT system strives to strike a balance between transit speed and impacts to general traffic. In segments where it was judged that roadway capacity was needed for general traffic and the BRT operation would not be significantly affected, either semi-exclusive or mixed-flow operation is proposed rather than exclusive lanes. In areas of high BRT ridership volumes, exclusive transit lanes are proposed such as on Dillingham Boulevard. A fully grade-separated transit system was considered and rejected since it was determined at the outset that the public and the City Council were not in favor of an elevated transit system because of its high cost and its physical and visual impacts as discussed in FEIS Chapters 2, 3, and 5.

4. The Neighborhood Board No. 10, after going to many meetings, some of us for ten years or more, believe that you should not pursue the Bus Rapid Transit. We believe the Transportation System Management will work with the addition of the zipper lanes and express ramps and express lanes.

Response: Comment noted. It states the commenter's preference for a LPA.

5. Our concern is that by coming from Middle Street into the rest of town on existing roadways, you're going to be taking normal traffic and piling it up. You're going to have Christmas Ala Moana all year round in downtown. You're just not going to be able to get around. Keeaumoku will not be a viable street. Can't get from here to there.

Response: The FEIS Chapter 4 presents the traffic effects associated with the Refined LPA. It is not the conversion of lanes that will create the congestion. The congestion for motorists will be there without the BRT. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

6. If you remember eight, ten years ago, it's going to cost us \$2 billion to get in. Now it's only cost us \$1.5. How come? The other half billion dollars you're taking out of the hide of the people who are trying to drive around their neighborhoods. So, we're very concerned that that part of this item not be done.

Response: The system proposed in the early 90s was an elevated rail rapid transit system, which is different from the proposed BRT.

7. Also, we're concerned that we have a transportation plan going towards approval but we don't have a PUC development plan. And, we very strongly believe that land use should precede not follow transportation. We have the transportation fee waggling the land use dog here and we're a little concerned about that.

Response: See response to comment #2.

8. *Some of our briefings said, and, of course, the PUC should grow. Everybody agrees. We've had PUC meetings and they've stopped having them because nobody agreed. Are we going to have growth? We have plans for Kapolei that says people going to be out there. If that happens, we may not need this.*

**Response:** Thank you for your concerns about issues being addressed in the Primary Urban Center Development Plan (PUC DP) update. We encourage your continued participation in the PUC DP process. Although the BRT Alternative was evaluated as being consistent with the Public Review Draft of the PUC DP (June 1999), the In-Town BRT would still be designed to support current land uses plus future land use patterns, particularly in vacant and underutilized parcels in Kakaako, Waialae, and near Ala Moana Center and the Convention Center. These are the locations where development is likely to occur with or without the BRT project.

9. *Technology changes a great deal. Three years ago we wouldn't have thought about Internet. Five years from now who needs transportation at all. So that you need not to spend \$1.5 billion for something that may not happen. Fortunately, the funding seems to be not required until 2003. So, you may have a chance to start the first part of it without taking our streets downtown.*

**Response:** As described in FEIS Chapter 1, there is sufficient present travel demand to justify the Refined LPA now. Not only is the system justified by present needs, but the need for the benefits of the system would become even more urgent as growth occurs. Therefore, as the executive agency charged with providing and maintaining adequate transportation infrastructure, it would be prudent to not pursue implementing this project. A decision on the final technology will not be made until 2008. By then the long-term options will be service proven.

10. *DEIS used old projected 2025 population figure.*

**Response:** The FEIS 2025 population projections have been revised. These population projections are the same as those used in the Transportation for Oahu Plan (TOP 2025) prepared for the Oahu Metropolitan Planning Organization, April 8, 2001.

11. *DEIS projected a 74% ridership increase for 2025.*

**Response:** Comment noted. It is a statement of fact not requiring a response.

12. *DEIS assumes present conditions for 2025, not future potential conditions.*

**Response:** It is unclear what is meant by future potential conditions.

13. *Factors not considered in the 2005 DEIS: City's vision for the In-Town Growth Development.*

**Response:** The goals of the Primary Corridor Transportation Project are consistent with the City's vision for In-Town Growth Development.

14. *Factors not considered in the 2005 DEIS: Potential growth in Ewa & Central Oahu.*

**Response:** The goals of the Primary Corridor Transportation Project and the Ewa and Central Oahu growth forecasts used in the MTS/DEIS and FEIS are consistent with planned development in Ewa and Central Oahu.

15. *Factors not considered in the 2005 DEIS: Alter work & social habits over the next 25 years.*

16. *Factors not considered in the 2005 DEIS: Changes in vehicles, their totals & support firms.*

**Response:** To the extent that they can be predicted, changes in work and social habits over the next 23 years are factored into the Oahu Metropolitan Planning Organization's travel demand model used for the project.

17. *DEIS estimates require more real estate taxes.*

**Response:** It is not clear what is meant by "changes in vehicles, their totals, and support firms".

18. *Can HECO deliver the electricity, how & cost?*

**Response:** This project has been developed following City Council policy to not increase taxes. The financial analysis (Chapter 6 of the FEIS) shows that no increases in existing taxes or new taxes will be required to fund the project as proposed.

19. *Seniors tend to use non-Express buses rather than Express buses with 1/4 to 1/2 mile stop.*

**Response:** HECO has indicated that they can supply the electricity needed with the EPT system within the available capacity of their present facilities.

20. *Makai Neighborhood Board on Oct. 18th passed the following motions: 1) The Board was against the Bus Rapid Transit System with dedicated lanes (11-0-1). 2) The board was for the Hub-&-Spoke Network (TSM) without dedicated lanes. (11-1-0).*

**Response:** Comment noted. It states the commenter's preference for a LPA.

Part B - SDEIS Comments

21. *The Makai/Tanilais/Lower Punchbowl Neighborhood Board No. 10 voted unanimously (8-0) on March 21, 2002 to request the Department of Transportation Services to hold a public meeting on the Supplemental Draft environmental Impact Statement - Primary Corridor Transportation Project (PCTP) during its review period. The meeting in the middle of April would be most appropriate to allow the public to prepare their comments for submissions by May 7, 2002. Also, the public should be permitted to ask questions on draft EIS and give comments at their meeting. This procedure was followed at a public meeting for the Major Investment Study/DEIS for PCTP.*

**Response:** DTS responded with a letter dated April 12, 2002 stating that the SDEIS public hearing would be held April 20, 2002.

22. *I'm the chair of the Makai Neighborhood Board. Our board has continuously opposed the BRT as currently designed.*

**Response:** Thank you for attending the public hearing and expressing your views regarding the project.



23. *The idea is that those people living in Manoa, Makiki, Nuuanu and Kaimuki are going to be greatly disadvantaged because of the additional red lights and the co-use of the road we're using now.*

**Response:** Chapter 4 of the FEIS fully discusses the consequences of converting selected general purpose lanes to priority use by transit vehicles.

When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

24. *We don't object to getting in from Kapelei to Māhala Street.*

**Response:** We concur that the Regional BRT is an important component of the BRT project. We heard a briefing, actually Thursday evening, about the hub-and-spoke. That may be a good thing. Let's do that first.

**Response:** The conversion of the existing bus system to a hub-and-spoke configuration is already on-going and will precede many of the other elements of the Refined LPA.

26. *Let's get the circulation inside the Downtown area worked out. Then we find out where we want to plug in the BRT coming in.*

**Response:** Comment noted. It is unclear what circulation needs to be worked out in the Downtown area. The BRT will enhance mobility not only downtown, but from Kapelei to Waikiki.

27. *Let's also look at this as a transportation plan, not a bus plan. Instead we went through all these things.*

**Response:** The OMPPO's Transportation for Oahu Plan, TOP 2025, is Oahu's transportation plan and the BRT project is the transit component of the plan.

28. *But if you look at the alternatives, we had minimum bus, moderate bus, and a large bus.*

**Response:** Comment noted.

29. *If you look at the map, if you want to get from Kapelei to Waikiki, go by boat. For a billion dollars, they can get a whole lot of boats to come in there.*

**Response:** Comment noted.

30. *We started with, "Let's get the Federal Transportation dollars and see what we can do with them."*

**Response:** The PCTP was initiated to solve the purposes and needs stated in Chapter 1. Capturing federal dollars is an approach to funding the LPA, not the starting point.

31. *Speaking of planning, one time, you said we'll do those PUC, the Public Urban Core Development. That plan has been stalled for years. Let's do that first. If we have the buses moving down, then we'll have to say, "How can we build our city around the buses?" Let's build the city first, then put the buses in later.*

**Response:** There is no indication of when the updated Primary Urban Center Development Plan (PUC DP) will be adopted by the City Council. The environmental review process of the Primary Corridor Transportation Project (PCTP) cannot be delayed pending this outcome. The In-Town BRT has been designed to support current land uses and future land use patterns, particularly in vacant and underutilized parcels in Kakaako, Māhala, and near Ala Moana Center and the Convention Center. These are the locations where development is likely to occur with or without the PCTP. Because of this, the Refined LPA has been evaluated in the FEIS as being consistent with the Public Review Draft of the PUC DP (May 2002), as well as the current PUC DP adopted in 1990.

32. *The Makiki Neighborhood Board #10 opposes the Bus Rapid Transit (BRT) as currently proposed.*

**Response:** Thank you for taking the time to comment on the project. Your opposition to the BRT is noted.

33. *It provides a small increase in transportation convenience for a small portion of the Oahu residents and imposes a large transportation inconvenience on a large portion of Oahu residents.*

**Response:** Chapter 4 of the FEIS shows that there will be reduced delays to motorists as well as transit riders with the Refined LPA.

34. *The in-town part of the BRT system imposes a through traffic impact on the local in-town circulation without providing a relief or improvement to the in-town circulation.*

**Response:** See response to comment #5.

35. *The Primary Urban Core (PUC) hub-and-spoke should be designed and tested before any construction of BRT next Māhala Street. Design the in-town circulation first and then link it with the Kapelei to Town rapid transit.*

**Response:** Design of the PUC portion of hub-and-spoke system is scheduled to occur in FY 2003 and 2004. This will permit full coordination with implementation of the In-Town BRT.

36. *The supplemental DEIS states that the transportation should "support desired development patterns", but PUC development plan is on hold again. Transportation construction should not precede community approval of the Development Plan.*

**Response:** See response to comment #2.

37. *This is titled a transportation, but it is a rapid transit plan. It is a bus plan. It has been written with a very strong bias.*

**Response:** Comment noted. The proposed BRT is the transit component of OMPPO's multi-modal Transportation for Oahu Plan, TOP 2025.

38. *The desire to obtain Federal Transportation funds for mass transit seems to be a given. The need for through transit from Kapelei to Waikiki seems to be a given. A real transportation plan should include options such as a serious effort to reduce transportation needs by building the Second City or telecommuting.*

**Response:** Significant growth in the Second City is reflected in the TOP 2025 and PCTP. With regard to telecommuting, the concept of telecommuting has been discussed for decades and yet has not had a noticeable impact on travel demand to date. Even if telecommuting increases significantly in the future it would not eliminate the need for the Refined LPA. Instead it would help flatten out the peaks.

33. *Will there really be an employment need to go from Kapolei to Waikiki in 2025?*

**Response:** According to the OMP's Transportation for Oahu Plan, TOP 2025, the 2025 Ewa District's (which includes Kapolei) employment is projected to increase by 260% from 14,998 in 2000 to 56,634 in 2025. Even with the major growth in jobs forecast for the Ewa District, many residents of the District will still be commuting to Honolulu and Waikiki.

40. *Ocean transportation is not mentioned. The shortest route from Kapolei to Downtown or Waikiki is by sea. The ocean doesn't have to be repaired. For a billion dollars we could have a terrific ferry system.*

**Response:** Comment noted. While some ferry services could be a good complement to the BRT, a ferry system could not serve the many types of trips which the BRT will serve in the primary corridor.

41. *There is a transportation problem, but the current BRT is incomplete and expensive. Honolulu should complete the PUC Development Plan, implement the In-Town hub-and-spoke, and more completely analyze the transportation options for the 21st century.*

**Response:** Transportation options have been thoroughly analyzed as part of the OMP's regional planning and City PCTP processes. Implementation plans reflect the full coordination between the hub-and-spoke, Regional and In-Town BRT components of the Refined LPA transit system.

42. *The Makiki/Lower Punchbowl/Taraleis Neighborhood Board No. 10 continues to support the TSM alternative over the BRT, even though the City Council has accepted the BRT alternative.*

**Response:** Comment noted. We appreciate you taking the time to review the environmental documents and state your preference for the TSM Alternative.

43. *The Board is concerned about the traffic operations on King Street, Kapolei Blvd., Ala Moana Blvd., and Pensacola Street with the reduced passenger and commercial vehicles on these streets. Motorists will choose to take alternate routes through surrounding communities and neighborhoods. This BRT would move more traffic on to our streets. The SDEIS doesn't address this problem since the SDEIS assumes that people will get out of their vehicles and take the BRT. Some people will stop using their vehicles, but most will continue to drive.*

**Response:** Chapter 4 of the FEIS addresses traffic impacts for each of the streets mentioned. It acknowledges that with the Refined LPA there will be additional impacts to some streets along the alignment, but that overall there will be more benefits to not only transit riders but motorists as well. With regard to impacts to neighborhood streets, most neighborhood streets are discontinuous and would not be used as an alternate route by through traffic. In the event a neighborhood street is impacted, there are a variety of traffic calming measures that can be used to mitigate the impacts.

44. *There is also the problem of the mauka/makai streets being blocked at the intersections of the BRT corridors. This will affect traffic all the way up to the H-1 and beyond. SDEIS doesn't cover this problem.*

**Response:** The potential to extend the green phase for BRT buses will only be installed at those intersections where it would not create undue congestion for cross-street traffic.

45. *On street parking is planned to decline along the transit corridors because the BRT will be consuming up to two traffic lanes, which will necessitate removing parking spaces as outlined in the SDEIS. Therefore, parking impacts in communities and neighborhoods surrounding BRT transit corridors will be compounded, which is not addressed in the SDEIS.*

**Response:** Parking impacts in communities and neighborhoods surrounding the BRT transit corridor is addressed in the MISDEIS, SDEIS, and FEIS Section 4.3. As stated in the FEIS, it is expected that the Refined LPA will divert over 21,000 people per day out of their cars onto transit. Some of these former auto drivers will be able to give up their cars or park their cars at outlying park-and-ride facilities, thereby lessening the need for parking in the PUC. Nonetheless, DTS has committed that in areas where there is a large concentration of spaces affected, replacement parking in new off-street parking facilities will be considered, but only if they meet other livable community objectives and are the result of community based planning.

46. *The Public Transportation System's operating costs for FY 2002 seems to be underestimated based on the actual operating costs for its FY 2001. This raises the question about the system's cash flow analysis for FYs 2003 to 2025 as being underestimated. Will we be increasing the City's debt service and our taxes to pay for this transportation system?*

**Response:** The operating costs are calculated based on the size of the fleet and its operating plan, with an additional amount added for inflation.

This project has been developed following City Council policy to not increase taxes. The financial analysis (Chapter 6 of the FEIS) shows that no increases in existing taxes or new taxes will be required to fund the project as proposed.

There will be an increase in the City's debt service to pay for the General Obligation bonds. The debt service needs to be paid whether these bonds are used for the public transportation system, or any other capital project of the City.

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU  
850 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 532-4328 • Fax: (808) 525-4720 • Internet: www dot honolulu hawaii gov

SESELU HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE SEON LUYALMOTO  
DEPUTY DIRECTOR

April 19, 2002

Cheryl Soon, Director  
Department of Transportation Services  
650 S. King Street Third Floor  
Honolulu, Hawaii 96813

Dear Ms. Soon:

On July 24, 2001, Ala Moana/Kakaako Neighborhood Board #11 passed a resolution to support the City Council Resolution 01-208. This resolution related to the changes in the BRT proposed routes through the Downtown/Kakaako Neighborhood.

The BRT route through Kakaako and the Waterfront was divided and realigned to better serve the public, as well as facilitate redevelopment of the area. Changes were suggested by the group for relocation of the BRT from Ward Avenue to Pensacola Street to reduce the impact on rush hour traffic. The group also made suggestions about the location and style of shelters to be built.

Sincerely,

*George Kurtz*  
George Kurtz, Vice Chair  
Ala Moana/Kakaako Neighborhood Board #11  
Honolulu Hale  
Honolulu, Hawaii 96813

November 13, 2002

*Joyce Kurtz*  
Ms. Joyce Kurtz  
Vice Chair  
Ala Moana/Kakaako Neighborhood Board No. 11  
Neighborhood Commission  
City Hall, Room 400  
Honolulu, Hawaii 96813

Dear Ms. Kurtz:

Subject: Primary Corridor Transportation Project

This is in response to your April 19, 2002 letter and your oral testimony at the Public Hearing on April 20, 2002 regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. On July 24, 2001, Ala Moana/Kakaako Neighborhood Board #11 passed a resolution to support the City Council Resolution 01-208. This resolution related to the changes in the BRT proposed routes through the Downtown/Kakaako neighborhood.

**Response:** We appreciate the Neighborhood Board's support of the project.

2. The BRT route through Kakaako and the Waterfront was divided and realigned to better serve the public, as well as facilitate redevelopment of the area. Changes were suggested by the group for relocation of the BRT from Ward Avenue to Pensacola Street to reduce the impact on rush hour traffic. The group also made suggestions about the location and style of shelters to be built.

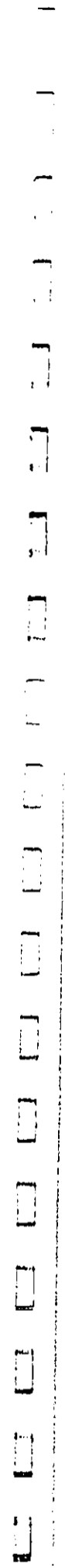
**Response:** Changing the BRT alignment to Pensacola and the Kakaako Makai alignment were a direct result of the working groups' efforts. Also, the FEIS, Chapter 5 includes the station concepts that resulted from the working groups' brainstorming sessions.

3. I'm speaking for Neighborhood Board 11, Ala Moana-Kakaako Neighborhood Board. We support the resolution for the changes in the City - or in the Bus Rapid Transit system.

**Response:** Thank you for supporting the project and taking the time to attend the public hearings. We feel that the route through Kakaako and the waterfront will better serve the public and it will facilitate the redevelopment of the area.

**Response:** Comment noted. This statement is consistent with the assessment provided in the SDEIS and Final Environmental Impact Statement (FEIS).

APR 24 2002



Ms. Joyce Kurtz  
Page 2  
November 13, 2002

5. We also feel that changes made to -- from Ward Avenue -- Pensacola Street will better serve the people of the area and will not impact the traffic.  
Response: We concur. This change was one of the reasons that the SDEIS was prepared. The project changes analyzed in the SDEIS reflect the working groups and other community involvement activities.

We will send you a copy of the FEIS under separate cover. We appreciate your interest in the project.

Sincerely,

  
CHERYL D. SOON  
Director



DOWNTOWN NEIGHBORHOOD BOARD NO. 13

66 KEEFERBOURD COMMISSION • CITY HALL, ROOM 408 • HONOLULU, HAWAII 96813

October 12, 2000

Mrs. Cheryl D. Soon, Director  
City and County of Honolulu  
Department of Transportation Services  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, HI 96813  
fax: 523-4730

Re: Comments for October 12, 2000 Public Hearing of Major Investment  
Study/Draft Environmental Impact Statement (MIS/DEIS)

  
Dear Mrs. Soon:

On October 5, 2000 the Downtown Neighborhood Board voted, 6 in favor, 2 abstentions, to support Bus Rapid Transit as the Locally Preferred Alternative. The vote followed almost one and a half hours of a presentation of the plan, with an emphasis on the Downtown/Kakaako/Ala Moana areas, and discussion. In addition, Board members had previously perused the MIS/DEIS.

The following items of concern were raised at the meeting and the Board would like them to be addressed.

1. All of the mass transit options, except the previous Heavy Rail system approach, provide for high volume, high frequency movement of people into the Central Urban Core in the morning and out of the area in the evening. There is little or no consideration of moving people in the opposite direction during those periods. Most buses in any of the three alternatives, but especially under the Bus Rapid Transit scheme, will bring passengers into town from east and west during the morning rush hour and take them away during the afternoon rush hour. If some of the 100,000 people expected to live in the Downtown/Kakaako area 20 years from now work out of the area, they will have few transit options, and their options certainly will not offer capacity or frequency. Setting up Transit Stations as intermediary collection points makes the problem worse because contra-flow through those stations will be very difficult, if not impossible and few, if any straight-through long distance routes (Downtown to Kapolei) will be in use during rush hours.



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2. Routing articulated electric buses along a two-way Richards-Halekauwila corridor will cost precious parking on Richards from Merchant to Halekauwila. More significantly, this route will create an almost impossible corner where Richards now curves in a single lane around to Halekauwila, separated only by a barrier wall from the slip road from Nimitz to Halekauwila. Now all traffic on Richards, makai of the entrance to the Ocean View Building (Post Office truck parking) and on Halekauwila is one-lane except for the last 50 yards on Halekauwila before Punchbowl. The present intersection probably does not meet good traffic safety standards but was dictated by the federal demand to close lanes on Halekauwila to meet Federal Courthouse/Office Building emergency security concerns after the Oklahoma City bombing.

3. Routing east-bound electric buses along the makai curb of Ala Moana Blvd. the length of Ala Moana Regional Park will remove very many heavily-used weekend parking spaces. It will also eliminate existing drop off points for park users unloading equipment, supplies, etc. for use in the mauka portions of the park. The Park Road is too narrow at most points for this type of loading and unloading and too far from the mauka sections of the park.

4. Block J is mentioned in the document as a park and ride site. However it is not in any of the charts. Recently, the development project for the site was canceled and there has been talk of selling the City owned property. Given the fluid status of Block J, what is the latest scenario for a park and ride on the site, and if it is not selected, what alternate sites are under consideration?

5. A'ala Park is not mentioned as one of the sites for the Iwilei Transit Center. As you know, the Board has objected to using the park site. Have you dropped A'ala Park from consideration?

6. If electric substations need to be constructed, what will they look like? How large will they be? Will they be intrusive on the community?

7. On the equity portion of the report, you calculated the economic impact on minority and low income population. Did you use the same group (minority / low income population) for the cost-effectiveness analysis or did you include a larger population?

8. In that it is very difficult to estimate the potential demand for a new product, can you elaborate how you estimated the demand for the study? Did you conduct a broad scale survey of the population or have you used other tools for estimating the demand?

Sincerely,

*Lynn Matusow*

Lynne Matusow, Chair

cc: Councilmember Duke Baimum, Honolulu Hale, 2nd Floor  
OEQC, 235 S. Beretania St. Suite 702, Honolulu, HI 96813, Attn: Governor Cayetano  
Parsons Brinckerhoff Quade and Douglas, Inc., Pacific Tower, Suite 3000, 1001 Bishop Street, Honolulu, HI 96813



**DOWNTOWN NEIGHBORHOOD BOARD NO. 18**

4th FLOOR, ROOM 408 • HONOLULU, HAWAII

October 26, 2000

**Environmental Impact Statement (MIS/DEIS) Primary Corridor Transportation Project Testimony Before the City Council Transportation Committee Regarding the Major Investment Study/Draft**

On October 5, 2000 the Downtown Neighborhood Board voted, 6 in favor, 2 abstentions, to support Bus Rapid Transit as the Locally Preferred Alternative. The vote followed almost one and a half hours of a presentation of the plan, with an emphasis on the Downtown/Kakaako/Ala Moana areas, and discussion. In addition, Board members had previously perused the MIS/DEIS.

The following items of concern were raised at the meeting:

1. All of the mass transit options, except the previous Heavy Rail system approach, provide for high volume, high frequency movement of people into the Central Urban Core in the morning and out of the area in the evening. There is little or no consideration of moving people in the opposite direction during those periods. Most buses in any of the three alternatives, but especially under the Bus Rapid Transit scheme, will bring passengers into town from east and west during the morning rush hour and take them away during the afternoon rush hour. If some of the 100,000 people expected to live in the downtown/Kakaako area 20 years from now work out of the area, they will have few transit options, and their opinions certainly will not offer capacity or frequency. Setting up Transit Stations as intermediary collection points makes the problem worse because contra-flow through those stations will be very difficult, if not impossible and few, if any straight-through long distance routes (Downtown to Kapolei) will be in use during rush hours.

2. Routing articulated electric buses along a two-way Richards-Halekaiwi corridor will cost precious parking on Richards from Merchant to Halekaiwi. More significantly, this route will create an almost impossible corner where Richards now curves in a single lane around to Halekaiwi, separated only by a barrier wall from the slip road from Nimitz to Halekaiwi. Now all traffic on Richards, makai of the entrance to the Ocean View Building (Post Office truck parking) and on Halekaiwi is one-lane except for the last 50 yards on Halekaiwi before Punchbowl. The present intersection probably does not meet good traffic safety standards but was dictated by the federal demand to close lanes on Halekaiwi to meet Federal Courthouse/Office Building emergency security concerns after the Oklahoma City bombing.

3. Routing east-bound electric buses along the makai curb of Ala Moana Blvd. the length of Ala Moana Regional Park will remove very many heavily-used

weekend parking spaces. It will also eliminate existing drop off points for park users unloading equipment, supplies, etc. for use in the mauka portions of the park. The Park Road is too narrow at most points for this type of loading and unloading and too far from the mauka sections of the park.

4. Block J is mentioned in the document as a park and ride site. However it is not in any of the charts. Recently, the development project for the site was canceled and there has been talk of selling the City owned property. Given the fluid status of Block J, the Board does not know what the latest scenario for a park and ride on the site is and what alternate sites are under consideration.
5. A'ala Park is not mentioned as one of the sites for the Iwilei Transit Center. The Board objects to using the park site.
6. The Board is concerned about the appearance, size, and potential intrusiveness of electric substations. What will they look like? How large will they be? Will they be intrusive on the community?
7. On the equity portion of the report, the economic impact on minority and low income population was calculated. It is not clear whether the same group (minority/low income population) was used for the cost-effectiveness analysis or a larger population was used.
8. It is very difficult to estimate the potential demand for a new product. The Board is interested in how the demand for the study was estimated. Was a broad scale survey of the population conducted or were other tools used to estimate the demand?

*Lynne Matusow*  
Lynne Matusow, Chair



City of Honolulu  
Downtown Neighborhood Board System-Established 1973



**DOWNTOWN NEIGHBORHOOD BOARD NO. 18**

415 KEECHOLAHOE CONGRESSOR • CITY HALL, ROOM 408 • HONOLULU, HAWAII 96813

**DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU**

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SPERDY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE NEONA \*LAWYER/ADVISOR  
DEPUTY DIRECTOR



TPD502-01789R

November 13, 2002

*Lynne*  
Ms. Lynne Matusewicz, Chair  
Downtown Neighborhood Board No. 18  
Neighborhood Commission  
City Hall, Room 400  
Honolulu, Hawaii 96813

Dear Ms. Matusewicz:

Subject: Primary Corridor Transportation Project

This responds to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your October 12 and October 26, 2000 letters, and your oral testimony at the October 26, 2000 Special Transportation Committee Meeting regarding the MIS/DEIS. Part B responds to your May 6, 2002 letter regarding the SDEIS.

Part A - MIS/DEIS Comments

1. On October 5, 2000, the Downtown Neighborhood Board voted, 6 in favor, 2 abstentions, to support Bus Rapid Transit as the Locally Preferred Alternative.

Response: Comment noted. It states the commenter's preference for a LPA.

2. All of the mass transit options, except the previous Heavy Rail system approach, provide for high volume, high frequency movement of people into the Central Urban Core in the morning and out of the area in the evening. There is little or no consideration of moving people in the opposite direction during these periods. Most buses in any of the three alternatives, but especially under the Bus Rapid Transit scheme, will bring passengers into town from east and west during the morning rush hour and take them away during the afternoon rush hour. If some of the 100,000 people expected to live in the Downtown/Kakaako area 20 years from now work out of the area, they will have few transit options, and their options certainly will not offer capacity or frequency. Setting up Transit Stations as intermediary collection points makes the problem worse because contra-flow through those stations will be very difficult, if not impossible and few, if any straight-through long distance routes (Downtown to Kapolei) will be in use during rush hours.

Response: The In-Town BRT vehicles will operate at short headways (as often as every two minutes or less) during the morning and evening peak periods in both directions, inbound and outbound. Thus, people traveling in the off-peak direction will have greatly increased transit service in terms of capacities and headways than they do today. In addition, 4 to 8 minute headways during the non-peak-hours in both directions would offer residents throughout the In-Town BRT service area, and the Downtown/Kakaako sub area in particular, many more transit options than are available today. Additionally, there will be frequent BRT service along the H-1 corridor in the non-peak direction.

May 6, 2002

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
650 S. King Street, 3rd Floor  
Honolulu, HI 96813  
via fax: 523-4730

**MAY 7 2002**

Re: Primary Corridor Transportation Project, Supplemental DEIS

Dear Ms. Soon:

At its May 2, 2002 meeting, the Downtown Neighborhood Board reviewed the Supplemental DEIS for the Bus Rapid Transit System. We have the following comments:

1. The Board wishes to thank you and your team for listening to us and moving the BRT from Richards Street, makai of King Street, to a Bishop/Alakea couplet.
2. The Board asks you to consider adding a transit stop on Bishop Street, by Bank of Hawaii. Board members felt the distance from the Union Mall stop to the Queen Street stop was too far.
3. Our concerns in our comments on the DEIS in October 2000 concerning removing parking spaces along the makai curb of Ala Moana Blvd. the length of Ala Moana Regional Park have not been addressed. Many heavily-used weekend parking spaces will be lost as will existing drop off points for park users unloading equipment, supplies, etc. for use in the mauka portions of the park. The Park Road is too narrow at most points for this type of loading and unloading and too far from the mauka sections of the park. We again ask you to address this issue.

4. Page 5-24 of the document says: "Security system would be provided to protect the public and the transit system from crime and vandalism in all of the alternatives. The security system may include a combination of the following: transit system workers, special transit police, and local police." The board is concerned that new duties may be assigned to HPD and that HPD funds may be used for this purpose. At the April 24 City Council public hearing on the budget Police Chief Donohue testified that his department is already several million dollars in the hole because of mandated salary increases. Meanwhile, the crime rate is rising and the department is, we believe, understaffed. We could, for example, use more police officers in our district to deal with the increase in rave parties attended by hundreds and the problems these events cause. We can't afford to have HPD assigned the duties of transit cops unless HPD is given additional manpower and funds, preferably from transit sources, to perform these duties. We would like this addressed in the final environmental impact statement.

Sincerely,

*Lynne Matusewicz*

Lynne Matusewicz, Chair

cc: Genevieve Salmonson, OEQC



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3. *Routing articulated electric buses along a two-way Richards-Halekaunā corridor will cost precious parking on Richards from Merchant to Halekaunā. Most significantly, this route will create an almost impassable corner where Richards now curves in a single lane around to Halekaunā, separated only by a barrier wall from the slip road from Nimitz to Halekaunā.*

**Response:** Since the MISDEIS was published, the Downtown/Kakaako Working Group recommended and the City has approved a change in the In-Town BRT alignment which removes the BRT from the section of Richards Street between S. King Street and Nimitz Highway/Aia Moana Boulevard and uses Alaheka Street (mauka bound) and Bishop Street (makai bound) instead.

4. *Routing east-bound electric buses along the makai curb of Ala Moana Blvd. the length of Ala Moana Regional Park will remove very many heavily used weekend parking spaces. It will also eliminate existing drop off points for park users unloading equipment, supplies, etc. for use in the mauka portions of the park. The Park Road is too narrow at most points for this type of loading and unloading and too far from the mauka sections of the park.*

**Response:** It is acknowledged in the FEIS that the proposed BRT lane will eliminate 124 on-street parking spaces on Ala Moana Boulevard adjacent to Ala Moana Regional Park, which are currently available at restricted times between 10 p.m. and 4 a.m. on weekdays, and all day on weekends. This elimination of parking spaces has been identified as an unavoidable adverse impact in the FEIS.

5. *Block J is mentioned in the document as a park and ride site. However it is not in any of the charts. Recently, the development project for the site was canceled and there has been talk of selling the City owned property. Given the fluid status of Block J, what is the latest scenario for a park and ride on the site, and if it is not selected, what alternate sites are under consideration?*

**Response:** Block J is no longer being considered as a park-and-ride site. This is reflected in the FEIS. The Hiale and Middle Street Transit Center/Park-and-Rides will serve as close-in park-and-rides.

6. *Alaia Park is not mentioned as one of the sites for the Hiale Center. As you know, the Board has objected to using the park site. Have you dropped Alaia Park from consideration?*

**Response:** Alaia Park is not being considered as a location for the Hiale Transit Center.

7. *If electric substations need to be constructed, what will they look like? How large will they be? Will they be intrusive on the community?*

**Response:** If the In-Town BRT uses the embedded-plate technology (EPT), a system of traction power supply stations (TPSS) spaced between 3,000 and 6,000 feet apart will be needed, for a total of fifteen TPSS along the entire In-Town BRT alignment. Where feasible, TPSS would be located within proposed transit centers or areas where they would be as unobtrusive as possible. These stations could be located on vacant lots, lots shared with existing buildings or structures, or within existing buildings, such as parking structures.

A typical self-contained TPSS would be a metal structure measuring approximately 35 feet long by 15 feet wide by 10 feet high. The structure would include ventilation or air conditioning for cooling the equipment, and a paved area on one side of the structure to accommodate equipment access. The exterior enclosure/building cladding of the structure would be designed to suit the

location. Landscaping/screening would be added to mitigate visual impacts if necessary. If the TPSS is located in an open area or unpaved lot, depending on the location a perimeter fence may be used, although fencing is not necessary for safety reasons.

If the TPSS is located within an existing parking structure or building where height is limited, it could be designed to fit the space provided. The equipment would be enclosed using either pre-fabricated metal or masonry walls to partition the floor to ceiling space of the structure. Dimensions would be 35 feet long by 15 feet wide with the height varying to suit the structure. Since a decision on whether to use the EPT will not be made until 2005 and the status of potential sites could change between now and then the FEIS Appendix B shows general rather than specific locations for TPSS. The substitution locations have changed since the MISDEIS.

8. *On the equity portion of the report, you calculated the economic impact on minority and low-income population. Did you use the same group (minority / low income population) for the cost-effectiveness analysis or did you include a larger population?*

**Response:** In accordance with Federal Transit Administration guidelines, the cost-effectiveness analysis is for the entire island-wide population.

9. *In that it is very difficult to estimate the potential demand for a new product, can you elaborate how you estimated the demand for your study? Did you conduct a broad scale survey of the population or have you used other tools for estimating the demand?*

**Response:** The travel forecasts for the Primary Corridor Transportation Project were developed using travel forecasting procedures developed for the Oahu Metropolitan Forecasting Modal Development Project in April 1998. These procedures simulate the choices made by residents, business, and visitors regarding the nature, number, mode, time-of-day, and geographic orientation of trips that they make on a typical weekday. The procedures have been developed with data obtained in extensive surveys of Oahu households, transit riders, and air passengers. Future year forecasts reflect the population and employment forecasts that have been prepared by DBEDT and the zonal allocations that have been prepared by the City Department of Planning and Permitting.

The travel forecasting methodology and resulting travel forecasts used for the Primary Corridor Transportation Project are described in Chapter 2 of Product 7-19 Technical Memorandum of Travel Forecasting Results (Final). The transportation plan for Oahu is described in the Oahu Metropolitan Planning Organization's report, Transportation for Oahu Plan TOP 2025, April 6, 2001.

10. *The Board on October 5 did vote to support the Bus Rapid Transit system.*

**Response:** Comment noted. It states the commenter's preference for a LPA.

11. *One of the concerns that was raised that we have with it is it's going to be dedicated to bringing people in the morning and out in the afternoon. But we will have reversed commuters. And this is something we've been concerned about for years. There needs to be something to get the people going in the opposite direction at that time of day.*

**Response:** See response to comment #2.



12. There was major concern voiced about routing articulated electric buses along a two-way Richards/Halekauwila corridor. It's going to cost precious parking on Richards from Merchant to Halekauwila and it's also going to create an almost impossible corner where Richards now curves in a single lane around to Halekauwila, separated only by a barrier wall from the slip road from Nimitz to Halekauwila. Part of this is because the Feds wanted protection for the Courthouse. And we also understand have four driveways on that block. So, there was concern that how it's going to do.

Response: See response to comment #3.

13. There was concern routing east-bound electric buses along the makai curb of Ala Moana Boulevard. The length of Ala Moana Regional Park will remove very many heavily used west-end parking spaces. This is also the area where the teams use to drop off points for their equipment for games. It's what we've been told. Because the Park Road is too narrow at most points for this type of loading and unloading and it's too far from the mauka sections of the park. So, there was concern about that.

Response: See response to comment #4.

Part B - SDEIS Comments

14. The Board wishes to thank you and your team for listening to us and moving the BRT from Richards Street, makai of King Street, to a Bishop/Alaia couplet.

Response: You are welcome and we appreciate the Neighborhood Board's participation in the project development process and look forward to working with you throughout project development and implementation.

15. The Board asks you to consider adding a transit stop on Bishop Street, by Bank of Hawaii. Board members felt the distance from the Union Mall stop to the Queen Street stop was too far.

Response: The distance between the Union Mall and Bishop Street BRT stops is less than 1/4 mile. The average spacing between stops on the BRT is between 1/2 and 3/4 mile, which is based on the need to have fewer stops than do local buses to provide a faster travel time option for users.

16. Our concerns in our comments on the DEIS in October 2000 concerning removing parking spaces along the makai curb of Ala Moana Blvd. The length of Ala Moana Regional Park have not been addressed. Many heavily-used weekend parking spaces will be lost as well as existing drop off points for park users unloading equipment, supplies, etc. for use in the mauka portions of the park. The Park Road is too narrow at most points for this type of loading and unloading and too far from the mauka sections of the park. We again ask you to address this issue.

Response: See response to comment #4.

17. Page 5-24 of the document says: "Security system would be provided to protect the public and the transit system from crime and vandalism in all of the alternatives. The security system may include a combination of the following: transit system workers, special transit police, and local police." The board is concerned that new duties may be assigned to HPD and that HPD funds may be used for this purpose. At the April 24 City Council public hearing on the budget Police

Chief Donohue testified that his department is already several million dollars in the hole because of mandated salary increases. Meanwhile, the crime rate is rising and the department is, we believe, understaffed. We could, for example, use more police officers in our district to deal with the increase in rave parties attended by hundreds and the problems these events cause. We can't afford to have HPD assigned the duties of transit cops unless HPD is given additional manpower and funds, preferably from transit sources, to perform these duties. We would like this addressed in the final environmental impact statement.

Response: The O&M costs for the BRT include provision for security personnel. A decision on whether to use these funds to reimburse HPD, contract with a private security firm, or establish its own security force will be decided during the next phase during operations planning and start-up.

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director



WAIANAË COAST NEIGHBORHOOD BOARD NO. 24

44 NEIGHBORHOOD COMMISSION • CITY HALL, ROOM 408 • HONOLULU, HAWAII 96813

November 14, 2000

Mr. Duke Bainum  
Chair, Transportation Committee  
City & County of Honolulu  
530 South King Street, Rm. 200  
Honolulu, Hawaii 96813

Aloha Councilmember Bainum and members of the Transportation Committee:

My name is Patty Kahanamoku Teruya, and I am speaking today as a member of Wai'anae Neighborhood Board No. 24.

The residents of Leeward Oahu are anxious to see more improvements to the Transportation system. The County Express bus is helping us to get to town faster than the local bus service. But further improvements such as those proposed under the Bus Rapid Transit Alternative would get Wai'anae bus riders to town even faster.

The exclusive lanes and special ramps on the freeway will allow the buses to get past the worst traffic spots. This will make the ride faster and keep the buses on schedule. More Leeward residents will be willing to take the bus if it can get them to town faster and if the schedule is reliable.

Once in town, people need to be able to get around in the same way - faster and on a dependable schedule. The in town BRT would do just that.

Therefore, I support Resolution 00-249 to adopt the Bus Rapid Transit Alternative as the Locally Preferred Alternative.

Mahalo for your consideration and time.

Sincerely,

*Patty Kahanamoku Teruya*  
Patty Kahanamoku Teruya  
Board Secretary  
Planning & Zoning Chair



Oahu's Neighborhood Board System - Established 1973

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE NEKOI - MIYAJIOTO  
DEPUTY DIRECTOR

November 13, 2002

Ms. Patty Kahanamoku Teruya  
Planning and Zoning Chair  
Wai'anae Coast Neighborhood Board No. 24  
Neighborhood Commission  
City Hall, Room 400  
Honolulu, Hawaii 96813

Dear Ms. Teruya:

Subject: Primary Corridor Transportation Project

This is in response to your November 14, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. The residents of Leeward Oahu are anxious to see more improvements to the Transportation system. The County Express bus is helping us to get to town faster than the local bus service. But further improvements such as those proposed under the Bus Rapid Transit Alternative would get Wai'anae bus riders to town even faster.

Response: Comment noted. The project is in agreement with this statement.

2. The exclusive lanes and special ramps on the freeway will allow the buses to get past the worst traffic spots. This will make the ride faster and keep the buses on schedule. More Leeward residents will be willing to take the bus if it can get them to town faster and if the schedule is reliable.

Response: Comment noted. The project is in agreement with this statement.

3. Once in town, people need to be able to get around in the same way - faster and on a dependable schedule. The in town BRT would do just that.

Response: Comment noted. The project is in agreement with this statement.

4. Therefore, I support Resolution 00-249 to adopt the Bus Rapid Transit Alternative as the Locally Preferred Alternative.

Response: Comment noted. It is a statement of the commenter's preference for an LPA.

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

Sincerely,

*Cheryl D. Soon*  
CHERYL D. SOON  
Director



MILILANI/WAIPIO/MELEMANU NEIGHBORHOOD BOARD NO. 25  
61 NEIGHBORHOOD COMMISSION • CITY HALL, ROOM 608 • HONOLULU, HAWAII

**RESOLUTION SUPPORTING THE SELECTION OF THE BUS  
RAPID TRANSIT ALTERNATIVE AS THE LOCALLY  
PREFERRED ALTERNATIVE FOR THE PRIMARY CORRIDOR  
TRANSPORTATION PROJECT**

WHEREAS, traffic is a problem and the existing system cannot handle the current demand which leaves no room for expected growth; and

WHEREAS, the Oahu Trans 2K process has been an extensive, community-based planning effort to gather community input and to fashion a transportation program that meets the varied needs and desires of the people of Honolulu; and

WHEREAS, participants in the Oahu Trans 2K process agreed that there is not enough room to build new streets or widen existing streets on a scale that would ease traffic congestion, and that any improvements to the transportation system must foster liveable communities; and

WHEREAS, the public has emphasized through the Oahu Trans2K process that the future plan and the proposed system must be affordable without needing to resort to any additional local funding sources such as user fees or tax increases; and

WHEREAS, residents islandwide have stated the need to increase the people-carrying capacity by providing an attractive alternative to the private automobile; to support desired development patterns; to provide a transit-based option between Central/Leeward Oahu and Honolulu's Primary Urban Center; and to improve connections between destinations with the Primary Urban Center; and

WHEREAS, the City has completed a Major Investment Study/Draft Environmental Impact Statement for the Primary Corridor Transportation Project which identifies and analyzes three transportation alternatives to meet these goals; and

WHEREAS, only the Bus Rapid Transit Alternative meets all the transportation objectives noted in the project study; and

WHEREAS, the Regional Bus Rapid Transit program would make improvements to the freeway to permit increased people-carrying capacity, greater convenience, and faster speeds in transit service between outlying areas in Central and Leeward Oahu and Downtown Honolulu; and



Oahu's Neighborhood Board System - Established 1973

WHEREAS, Regional Bus Rapid Transit improvements would include an extension of the morning zipper lane on H-1 from Radford Drive to the Keehi Interchange; dedicated ramps in Kapolei, Waipahu, Kaonohi Street, Radford Drive, and Middle Street that would provide access to the express and zipper lanes and allow transit vehicles to bypass traffic congestion; an outbound zipper lane on the H-1 in the afternoon peak hours; and improvements to the Waiawa Interchange to provide for an afternoon zipper lane crossover facility; and


WHEREAS, the Bus Rapid Transit system would improve the quality of life as well as offer transportation choices for Central Oahu residents who commute to and from Downtown Honolulu; now therefore

BE IT RESOLVED that the Miliiani/Waipio/Melemanu Neighborhood Board No. 25 strongly supports the selection and implementation of the Bus Rapid Transit Alternative as the Locally Preferred Alternative by the Honolulu City Council; and

BE IT FURTHER RESOLVED that the Miliiani/Waipio/Melemanu Neighborhood Board No. 25 strongly encourages the Mayor and City Council to explore and implement other measures that address Oahu regional transportation problems such as congestion road pricing and management and the use of appropriate "concurrency" mechanisms that could assure that allowing additional development in Central Oahu would not exceed the ability of the regional transportation infrastructure to accommodate such development; and

BE IT FURTHER RESOLVED that copies of this resolution be transmitted to the Mayor of the City and County of Honolulu; members of the City Council; the Director of Transportation Services and Planning and Permitting of the City and County of Honolulu; the Oahu Metropolitan Planning Organization; the Leeward Oahu Transportation Management Association; the Governor, all State Legislators, the State Office of Planning; the State Department of Transportation; and all Neighborhood Boards.

*Adopted unanimously at the Board's regular meeting of September 27, 2000.*

  
Dick Poitier, Chair

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
630 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 523-4328 • Fax: (808) 523-4730 • Website: www.cc.honolulu.hi.us

JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE TEGOTO-LUKAMOTO  
DEPUTY DIRECTOR

November 13, 2002

Mr. Dick Poirier, Chair  
Māhānā/Waipio/Moemānu Neighborhood  
Board No. 25  
Neighborhood Commission  
City Hall, Room 400  
Honolulu, Hawaii 96813

Dear Mr. Poirier:

Subject: Primary Corridor Transportation Project

This is in response to your September 27, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. *Be it resolved that the Māhānā/Waipio/Moemānu Neighborhood Board No. 25 strongly supports the selection and implementation of the Bus Rapid Transit Alternative as the Locally Preferred Alternative by the Honolulu City Council; and*

Responses: Comment noted. It is a statement of the commenter's preference for an LPA.

2. *BE IT FURTHER RESOLVED that the Māhānā/Waipio/Moemānu Neighborhood Board No. 25 strongly encourages the Mayor and City Council to explore and implement other measures that address Oahu regional transportation problems such as congestion road pricing and management and the use of appropriate "concurrency" mechanisms that could assure that allowing additional development in Central Oahu would not exceed the ability of the regional transportation infrastructure to accommodate such development...*

Responses: These measures could be further incentives for people to use transit, but are not part of the Oahu regional transportation plan (TOP 2025), of which the Refined LPA is a part.

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director



To: Ms Cheryl Soon  
Fax: 523-4730

**KALIIHI-PALANA COMMUNITY COUNCIL**  
117 KEE ST • Honolulu, Hawaii 96813

November 6, 2000

Ms Cheryl Soon, Director  
Department of Transportation Services  
711 Kapiolani Boulevard  
Honolulu, Hawaii 96813

Dear Ms Soon:

Re: Response to the Primary Corridor Transportation Project

On Monday, October 30, the Kaliihi-Palana Community Council held a Community Forum, "Establishing Public Policy."

KPCC's goal is to ensure that the neighborhood throughout Kaliihi-Palana is a positive place to live.

There were five areas of concern that were presented at the forum with the Primary Corridor Transportation Project as the major presentation and discussion.

The attendees consisted of representatives from the KPCC's geographical area which encompasses from Nuuanu Avenue to the airport and from the Koolau mountains to the sea.

The representatives in attendance were members of the Liliha Business Association, Kaliihi Business Association, Liliha-Kapalana Neighborhood Board, Kaliihi-Palana Neighborhood Board, Kaliihi Valley Neighborhood Board, Kaliihi-Palana Neighborhood Board, Hale Poi senior housing, Hauiki Housing, Mavor Wright Housing, Kam-Kahumahu Housing, residents from Kukui Palana geographical area, major service providers from Kaliihi Police Department, hospital, lions club, legislators, schools councilmembers and aides, and resource persons for the workshop.

The following comments and concerns were expressed:

1. Avoid condemnation of property;
2. Dillingham Blvd., existing five lane roadway will be reduced to two lanes, plus the turning lanes;
3. Left turns at intersections as opposed to left turns at every driveway;

DEPARTMENT OF TRANSPORTATION SERVICES  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE KEONI MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD1100-05424R  
TPD1100-05411R

Brother Greg O'Donnell, 1<sup>st</sup> Vice President  
Kalihī-Palaea Community Council  
1117 Kauli Street  
Honolulu, Hawaii 96819

Dear Brother O'Donnell:

Subject: Primary Corridor Transportation Project

This is in response to your November 6, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. Avoid condemnation of property.

**Response:** The alignment and elements of the Refined Locally Preferred Alternative (LPA) will be predominantly within existing roadway right-of-way so that there will be no displacements of residents or businesses required. Some businesses and residences will lose landscaping or parking in areas where the existing roadway right-of-way are not be adequate for the proposed transit alignment, but no one will have to move as a result of the right-of-way takes. A summary of estimated potential business impacts by site is provided in Final Environmental Impact Statement (FEIS) Chapter 5.

2. Businesses need loading/unloading.

**Response:** Comment noted. DTS agrees and substantial effort has been taken to maintain loading/unloading zones for businesses.

3. Allow for alternative considerations.

**Response:** Through the public outreach process many alternatives were analyzed and refinements made to the project in response to comments received. The alternatives considered are described in Chapter 2 of the FEIS.

4. Kalihi is being forced to carry the burden of cars coming in from Leeward, 1,000 parking spaces should not be provided on Dillingham Boulevard to accommodate vehicles coming in from outlying areas. What is Kalihi-Palaea getting in return?

**Response:** Of the 1,000 parking spaces proposed to be provided at the Middle Street Transit Center about 300 spaces will be for employees of TheBus, the remaining spaces will mainly provide people living in Kalihi and nearby areas auto access to the BRT system. Providing parking at the Middle Street Transit Center will encourage people to ride transit instead of driving down Dillingham Boulevard.

P. 2

Kalihī-Palaea Community Council

4. Businesses need loading/unloading;
5. Allow for alternative considerations;
6. Kalihi is being forced to carry the burden of cars coming in from Leeward, 1,000 parking spaces should not be provided on Dillingham Boulevard to accommodate vehicles coming in from outlying areas.
7. What is Kalihi-Palaea getting in return?
8. More emphasis should be placed on the bus system;
9. Recent change of venue from King Street to Dillingham Boulevard;
10. Need people to stop and shop in Kalihi;
11. We need to support businesses in the Kalihi area;
12. Kalihi is a bottleneck;
13. Parking at Honolulu Community College will be affected;
14. One alternative which has not been explored is the limitation on cars;
15. Preserve safety and quality of life.

The Kalihī-Palaea Community Council is supportive of the Primary Corridor Transportation Project.

The Kalihī-Palaea area is the most densely populated area on this island with a large population who depend on public transportation.

Safety issues of residents getting on and off the transit services as well as the impact it will have on the pedestrians, especially the elderly is of primary concern. For further questions and information, please call Irene Fujimoto at 845-5148.

Sincerely yours,

*Bro. Greg O'Donnell*  
Brother Greg O'Donnell  
1st Vice President

11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

5. *More emphasis should be placed on the bus system.*

**Response:** DTS continually reevaluates the level of service provided by the existing bus system and has begun to reconfigure the existing radial network of bus routes to a hub-and-spoke configuration. An integral part of the Refined LPA is completing the conversion of the bus system to a hub-and-spoke bus network and connecting it with the Regional and In-Town BRT system, thereby integrating the hub-and-spoke network with a fast, high-capacity transit system.

6. *Need people to stop and shop in Kaahā. We need to support businesses in the Kaahā area.*

**Response:** The In-Town BRT alignment through Kaahā will traverse Dillingham Boulevard, from Middle Street to Kaaahi Street with a Middle Street Transit Center, McNeil Street Transit stop, Alakawa Transit Stop and Iwilei Transit Center. With the Refined LPA there will be many more people traveling along Dillingham Boulevard than with the No-Build Alternative. For many businesses this increased exposure to potential customers could translate into increased sales.

7. *Parking at Honolulu Community College will be affected.*

**Response:** Parking at Honolulu Community College will not be affected by the Refined LPA. The concern expressed in the comment may be referring to the previous conceptual plan to construct a parking structure on HCC property, and to place a traction power supply station (TPSS) within the structure. However, the TPSS has been relocated and no parking structure is currently proposed as a part of this project.

8. *One alternative which has not been explored is the limitation on cars.*

**Response:** DTS does not have the authority to limit cars on the island.

9. *Preserve safety and quality of life.*

**Response:** The Refined LPA preserves and improves the quality of life of Oahu's residents by improving transportation linkages within the Primary Corridor and between Kapaolā and the Urban Core. System security planning has been part of overall system design.

10. *The Kaahā-Palama area is the most densely populated area on this island with a large population who depend on public transportation.*

**Response:** The Refined LPA will improve transit service for the Kaahā-Palama community.

11. *Safety issues of residents peeing on and off the transit services as well as the impact it will have on the pedestrians, especially the elderly is of primary concern.*

**Response:** The design of transit stops located in the median includes features such as protective railings separating the platforms from the adjacent traffic lane and to discourage transit patrons from exiting the platform except at designated locations. Traffic signals and cross walks will be provided at BRT stations to allow pedestrians to safely cross the street. It will be easier for the elderly to use the median stops on Dillingham Boulevard since they will only have to cross half the street width rather than the entire street when going to/or from the transit stops.

We will send you a copy of the FEIS under separate cover. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE "REO" MIYAMOTO  
DEPUTY DIRECTOR

WAIPAHU COMMUNITY ASSOCIATION  
94-440A Mokuola Street, Waipahu, Hawaii 96797

19 October 2000

Memorandum to Hearing Officer, Special City Council  
Transportation Committee


I am C. O. "Andy" Anderson, President of the Waipahu Community Association and Waipahu Resident presenting testimony in favor of Alternative No. 3, the bus rapid transit (BRT) which expands on the hub-and-spoke network to provide regional BRT service from Kapolei to Kāhili.

Our organization has not selected any of the transportation options currently under consideration, we have supported the hub and spoke effort and supported the rail system that was under consideration in the past. There is a need for additional and improved public transportation.

O'ahu must select the most ambitious transportation alternative currently offered to assure adequate transport options for present and future labor force workers. The recent expansion of bus service alternatives and addition of express service to and from Waipahu are a positive step. Further expansion, as currently proposed, is a must to assure transportation for the visitor industry labor force, most of whom work in the primary urban center and most commute from Ewa, Ewa Beach and Waipahu.

Thank you for accepting my testimony on this important matter.

Very Truly Yours,

  
C. O. "Andy" Anderson  
President

cc: Neighborhood Board No. 22, Chair Yamaguchi; file.

November 13, 2002

Mr. C. O. "Andy" Anderson, President  
Waipahu Community Association  
94-440A Mokuola Street  
Waipahu, Hawaii 96797  
Dear Mr. Anderson:

Subject: Primary Corridor Transportation Project

This is in response to your October 19, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. I am C. O. "Andy" Anderson, President of the Waipahu Community Association and Waipahu Resident presenting testimony in favor of Alternative No. 3, the bus rapid transit (BRT) which expands on the hub-and-spoke network to provide regional BRT service from Kapolei to Kāhili.

Response: Comment noted. It is a statement of the commenter's preference for an LPA.

2. Our organization has not selected any of the transportation options currently under consideration, we have supported the hub and spoke effort and supported the rail system that was under consideration in the past. There is a need for additional and improved public transportation.

Response: Comment noted. It is a statement of opinion.

3. The recent expansion of bus service alternatives and addition of express service to and from Waipahu are a positive step. Further expansion, as currently proposed, is a must to assure transportation for the visitor industry labor force, most of whom work in the primary urban center and most commute from Ewa Beach and Waipahu.

Response: The Refined Locally Preferred Alternative will provide further improvement to the connections requested.

We will send you a copy of the Final Environmental Impact Statement (FEIS) under separate cover. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director



**Final Environmental Impact Statement**

**Primary Corridor Transportation Project**

**Chapter 7.0**  
**Comments and Responses**  
**Organizations**





AMERICAN PUBLIC WORKS ASSOCIATION HAWAII CHAPTER

April 19, 2002

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3rd Floor  
Honolulu, Hawaii 96813

Subject: Supplemental Environmental Impact Statement  
Bus Rapid Transit System  
Public Hearing - Hawaii Convention Center Room 319 A & B  
Saturday, April 20, 2002

Aloha Ms. Soon,

We are in support of the Supplemental EIS for the Bus Rapid Transit System. As the Chapter Delegate for the American Public Works Association Hawaii Chapter, a member of the Procurement Committee and Committee of Fellows for the American Council of Engineering Companies, I have seen mass transit projects developed throughout our fine country and understand the critical importance of development of a mass transit program for Hawaii.

We are in full support of the development of the Bus Rapid Transit System for Hawaii and understand the critical importance of developing dedicated corridors for the system to operate efficiently. We urge you and the City and County of Honolulu to move forward with the program and to proactively move toward a solution to our growing traffic problems on Oahu.

Our organization supports the use of qualification based selection procedures for the future selection of design professionals for any design services for subject project and to ensure the quality of the final product. Please feel to call upon us for any assistance in these matters.

Very Truly Yours,  
American Public Works Association, Hawaii Chapter

  
Lester H. Fukuda, F.E., FACEC  
Chapter Delegate

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

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JEREMY HARRIS  
Mayor



CHERYL D. SOON  
DIRECTOR

GEORGE KIYOKI MIYAMOTO  
DEPUTY DIRECTOR

TPD402-01554R

November 13, 2002

Mr. Lester Fukuda  
Chapter Delegate  
American Public Works Association, Hawaii Chapter  
c/o 1132 Bishop Street, Suite 1003  
Honolulu, Hawaii 96813

Dear Mr. Fukuda:

Subject: Primary Corridor Transportation Project

This is in response to your April 19, 2002 letter regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. We are in support of the Supplemental EIS for the Bus Rapid Transit System. As the Chapter Delegate for the American Public Works Association Hawaii Chapter, a member of the Procurement Committee and Committee of Fellows for the American Council of Engineering Companies, I have seen mass transit projects developed throughout our fine country and understand the critical importance of development of a mass transit program for Hawaii.

Response: We appreciate your support for the Primary Transportation Corridor Project.

2. We are in full support of the development of the Bus Rapid Transit System for Hawaii and understand the critical importance of developing dedicated corridors for the system to operate efficiently. We urge you and the City and County of Honolulu to move forward with the program and to proactively move toward a solution to our growing traffic problems on Oahu.

Response: Thank you for supporting the refined bus rapid transit alternative.

3. Our organization supports the use of qualification based selection procedures for the future selection of design professionals for any design services for subject project and to ensure the quality of the final product. Please feel to call upon us for any assistance in these matters.

Response: Qualification based selection procedures will be used for procuring future design services. Thank you for your offer of assistance.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

  
CHERYL D. SOON  
Director

**BUILDING INDUSTRY  
ASSOCIATION**  
O F H A W A I I

October 12, 2000

Cheryl Soon, Director  
Department of Transportation Services, Testimony on the Primary Urban Corridor  
Transportation Project  
Thursday October 12, 2000 6:30 p.m. hearing  
Neal Blaisdell Center Hawaii Room

Director Soon:

Subject: Primary Urban Corridor Transportation Project

My name is Craig Watase, Building Industry Association of Hawaii Government Affairs  
Committee Vice Chair, and I would like to take this opportunity to offer our association's  
comments on the Primary Urban Corridor Transportation Project.

The Building Industry Association of Hawaii (BIA), one of Hawaii's largest trade  
associations, serves about 500 member companies, employing approximately 15,000  
people. Its membership includes general contractors, specialty contractors, developers,  
suppliers, realtors, architects, financial institutions, attorneys and numerous other  
businesses, all related to the building industry.

The proposal presents three alternatives, no-build, reconfiguration of the bus system and  
Bus Rapid Transit. BIA has concerns that:

1. Rail transit alternatives should have been explored. Information on higher-capacity  
alternatives would have ensured that all of the best options were considered.
2. The requirement "any improvements be affordable", should not preclude Trans 2K  
from considering more comprehensive solutions. "Affordability" needs to include not only  
cost, but revenues, federal assistance and increased community productivity and quality of  
life measured over time.
3. Transportation solutions need to be evaluated over a longer period. Twenty five years  
may be too short and the City might want to consider investing more for a 50- or 75-year  
transportation solution.

Thank you for this opportunity to offer my comments.

Sincerely,



Craig Watase  
Vice Chair  
Government Affairs

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
850 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
MAYOR

CHERYL O. SOON  
DIRECTOR

GEORGE MENDOZA  
DEPUTY DIRECTOR

November 13, 2002

Mr. Craig Watase, Vice Chair  
Government Affairs  
Building Industry Association of Hawaii  
1727 Dillingham Boulevard  
Honolulu, Hawaii 96819

Dear Mr. Watase:

Subject: Primary Corridor Transportation Project

This is in response to your October 12, 2000 letter and your oral testimony at the formal Public Hearing  
regarding comments on the MIS/DEIS.

1. Rail transit alternatives should have been explored. Information on higher-capacity alternatives  
would have ensured that all of the best options were considered.

Response: Grade-separated rail transit alternatives have been studied in the past and were  
rejected by the public and City Council early on in the PCTP. An at-grade light rail transit  
alternative was studied as part of the MIS/DEIS and was dropped after it was determined that it  
was substantially more costly than the BRT Alternative while offering no real advantages.

2. The requirement "any improvements be affordable", should not preclude Trans 2K from  
considering more comprehensive solutions. "Affordability" needs to include not only cost, but  
revenues, federal assistance and increased community productivity and quality of life measured  
over time.

Response: Although it would be ideal not to be constrained financially, major sources of funding  
for the Primary Corridor Transportation Project are federal and local funds which are limited.  
Therefore, we do have to find "affordable" solutions. City funds by City Council directive were not  
to include a tax increase.

The financial plan does consider federal assistance and future economic growth. However, to be  
fiscally responsible the financial plan assumes a conservative economic growth rate.

3. Transportation solutions need to be evaluated over a longer period. Twenty-five years may be too  
short and the City might want to consider investing more for a 50- or 75-year transportation  
solution.

Response: The 20- to 25-year time horizon is set by the Federal Transit Administration. It  
provides a balance between taking long-term effects into account while reflecting what can be  
reasonably forecasted.

Eric Wong,  
One 87th Avenue & Door  
Tom Zimmerman  
Bank of Hawaii

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**C.A.R.E.**  
Citizens Advocating Responsible Education



Mr. Craig Watase  
Page 2  
November 13, 2002

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in this project.

October 5, 2000  
Dear Members of the Special Transportation Committee,

Thank you for providing this opportunity to offer opinions and ask questions about the new proposed Primary Corridor Transportation Project.

On Monday, October 2, 2000, I voiced my original concern that taking away existing public lanes from busy streets such as Kapiolani Blvd., Dillingham Blvd., or Ward Ave. > will only create bottlenecks. These restrictions to existing traffic flow patterns will create traffic jams and add to existing commuting times for people using automobiles, mopeds, motorcycles, school buses, tour buses, trucks, and vans. People who use existing bus routes on these same roads that are to be shared with BRT vehicles, or on roads near the new bottlenecks - will also find new delays.

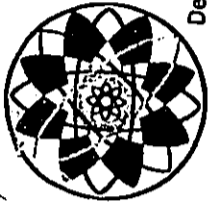
Before I prepare a final written testimony against this illogical plan, I would like to have some specific answers to questions raised Monday evening by several concerned citizens.

1. How many bottlenecks (places where existing lanes are squeezed down - usually by losing two traffic lanes - to make room for the new BRT lanes and platforms) will be created by the complete BRT system?
2. What are the locations of each of these bottlenecks?
3. How much extra commuting time will be added to drivers and passengers of automobiles, mopeds, motorcycles, school buses, tour buses, trucks, and vans; and bus riders who use the existing city bus routes - by each of these new bottlenecks?
4. How many lane-miles of existing public roads will be taken out of existing service, if the BRT is adopted? (For example, if two lanes of Kapiolani Boulevard are to be given to exclusive BRT use and no new lanes are taken from parking lanes, then for each mile of Kapiolani Boulevard given to the BRT - two lane miles would be taken out of service.)
5. How frequently do you expect that frustrated motorists caught in the gridlock created by these new bottlenecks - will cross over into the open BRT lanes on these congested streets?

Phone & Fax 808-7358049 Email wallyb41@aol.com  
1235 Center Street, Honolulu, Hawaii 96816

Sincerely,

CHERYL D. SOON  
Director



**C.A.R.E.**

Citizens Advocating Responsible Education



October 12, 2000  
Dear Members of the EIS Committee,

Thank you for providing this opportunity to offer opinions about the Draft Environmental Impact Statement (DEIS) for the Primary Corridor Transportation Project for Honolulu.

On Monday, October 2, 2000, I voiced my original concern that taking away existing public lanes from busy streets such as Kapiolani Blvd., Dillingham Blvd., or Ward Ave. > will only create bottlenecks. These restrictions to existing traffic flow patterns will create traffic jams and add to existing commuting times for people using automobiles, mopeds, motorcycles, school buses, tour buses, trucks, and vans. People who use existing bus routes on these same roads that are to be shared with BRT vehicles, or on roads near the new bottlenecks - will also find new delays.

On Oct. 11, I talked with Toru Hamayasu about the proposed plan. The major bottleneck on Kapiolani Blvd. starts on Atkinson Drive (where two lanes in the Ewa direction will be lost if we adopt the CityTram or BRT). Traffic will therefore back up in front of the new Convention Center.

Some of the other major bottlenecks formed by the proposed CityTram include University Avenue above Sinclair Circle and also on the corner with Kapiolani Blvd.

Ward Ave. and King St. will get find new delays, as will travelers along Ala Moana Blvd., Kuhio Ave., and Richards Street - as all will lose lanes now used by all vehicles, when they become restricted by prohibiting vehicles that use these busy lanes now.

The most serious gridlock will probably develop along Dillingham Blvd. In front of HCC, the plan now has only one lane left in each direction for all other vehicle traffic - including the local city buses, which must make regular stops in the right hand lane (as the proposed CityTram takes up the two center lanes). Obviously, these single lanes in each direction will back up.

The loss of many miles of heavily used public traffic lanes for the proposed CityTram also will lead to less people being able to use the existing roads even if it works as planned, because most of the time the new CityTram lanes will be empty. During rush hour, they are now filled with people in various vehicles that

6. Have you taken into consideration that vehicles that enter the new BRT lanes either by choice or by accident, may have difficulty getting back into the jammed public lanes?

7. Have you calculated the delays that such inevitable intrusions into the BRT lanes either by choice or by accident - into the projected expected savings in commuting times for BRT users?

8. Have you expected an increase in the noise level from horn honking that would accompany the gridlock created by all the new bottlenecks?

9. Have you expected an increase in road rage and other manifestations of frustration with increased traffic jams for automobiles, motorcycles, trucks, vans and other vehicles?

10. How many parking spaces will be lost to the new BRT system?

11. It was stated Monday that regular city buses will share the new curbside BRT lanes, but what time savings will remain if new BRT vehicles find the adjacent lane backed up and cannot pass the slower local buses that must stop in these new BRT lanes to accept and discharge passengers at the many bus stops that are along the BRT routes?

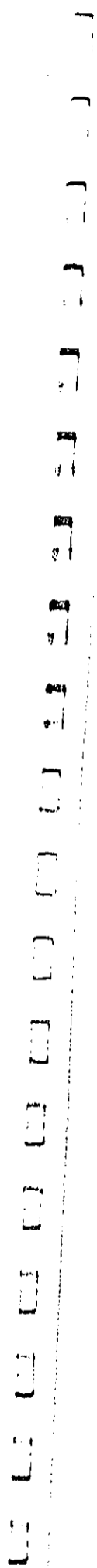
12. Have you calculated the negative impact on our ability to attract visitors by increasing noisy traffic jams and decreasing the amount of parking spaces (as many tourists also rent automobiles or mopeds or will get stuck in regular buses caught in the regular traffic lanes that will be snarled in gridlock if this plan is ever adopted)?

13. Have you considered coming off the proposed BRT lanes on these busy streets temporarily for one week, to observe the impact on the rest of the traffic? When will this trial to test this hypothesis begin? (as I hope the City Council will soon adopt this scientific approach before money is wasted on an Environmental Impact Statement that will not be needed)

Sincerely yours,

*Wally Bachman*

Wally Bachman  
Science Advisor  
wallyb41@aol.com





**C.A.R.E.**  
Citizens Advocating Responsible Education



October 26, 2000.

Dear Members of the Special Transportation Committee,

are still moving. An empty lane obviously does not increase the total number of people in motion, and it is planned to be empty most of the time - if it works according to plan.

Unfortunately, another major fault of this design, is that it does not take into account human nature. Without any physical barrier to separate the lanes, some people will cross over into the open transit lanes - particularly if the remaining public lanes get all jammed up. Accidents and mistakes by people not familiar with this new system will also put non-transit vehicles in the CityTram lanes.

**UNFORTUNATELY, ONCE THEY GET INTO THIS CENTER AISLE - THEY MAY HAVE DIFFICULTY GETTING BACK OUT (PARTICULARLY WHEN THE ADJACENT LANES ARE ALL JAMMED UP AT RUSH HOUR). THE RESULT IS GRIDLOCK!**

**GRIDLOCK** will also significantly increase the frequency of other unwanted behaviors including horn honking and road rage. It will also impede or prevent emergency and police vehicles from doing their jobs.

There will also be 947 existing parking spaces lost to the new CityTram lanes, making the already scarce parking spaces even more difficult to find.

Before the City wastes considerably more money on an EIS, I believe they should try to cone off the proposed BRT lanes on these busy streets temporarily for one week, to observe the impact on the rest of the traffic.

I hope the City Council will soon adopt this scientific approach before money is wasted on an Environmental Impact Statement that will not be needed if this hypothesis is correct, as nobody in their right mind wants **GRIDLOCK**.

As one citizen remarked, "The most expensive system is one that does not work." I believe the level of appropriation must be raised in order to come up with a system that actually moves more people during peak hours by providing new dedicated lanes all along the route - as the BRT proposal to eliminate many miles of existing lanes will only make things much worse by increasing the existing travel times because of traffic jams and **GRIDLOCK**.

Sincerely yours,

*Wally Bachman*

Wally Bachman  
Science Advisor  
Phone & Fax 808-735-8049 Email wallyb41@aol.com  
1235 Center Street, Honolulu, Hawaii 96816

Thank you for providing this opportunity to again offer opinions and ask questions about the new proposed Primary Corridor Transportation Project.

Today, the Honolulu Advertiser printed my letter entitled "New bus plan will lead to city gridlock", and I am including it today as the main focus of my testimony.

Beyond the gridlock predicted for rush hours, there is another error in the calculations of increased carrying capacity under the new system - even if everybody were to somehow stay out of the new "BRT only" lanes.

At the present time, these lanes are full of various vehicles - particularly during the morning and evening rush hours. According to the proposed plan, most of the time the new BRT lanes would be empty. A sparsely used lane obviously does not increase the total number of people in motion - unless you are only counting bus riders and forgetting the rest of the people who use these busy streets.

My question is, where can one find the "Worst Case Scenario" section of the Draft Environmental Impact Statement? It seems that this document avoids discussing relevant problems that happen each day during rush hour.

With the great number of negative consequences that would arise if gridlock regularly entangles our busiest roads, I again repeat C.A.R.E.'s request that you cone off the proposed BRT lanes on these busy streets temporarily for one week. This will enable us to observe the impact on the rest of the traffic and test whether this plan is even possible.

I hope the City Council will soon adopt this scientific approach before money is wasted on an Environmental Impact Statement that will not be needed, if test results reveal this vision to be true.

Sincerely yours,

*Wally Bachman*

Wally Bachman  
Science Advisor  
Phone & Fax 808-735-8049 Email wallyb41@aol.com  
1235 Center Street, Honolulu, Hawaii 96816

Misc. Com. No. 1304

ALREADY ON FAST TRACK

## New bus plan will lead to city gridlock

Larry Dove's Oct. 20 letter, "Drivers are ignoring diamond lane on H-1," points out a fundamental flaw of the proposed "In-Town BRT" system, now being put on the fast track at a series of public meetings.

This new bus rapid transit system is the most expensive part of the Primary Corridor Transportation Project for Honolulu and depends on all drivers staying out of new restricted "BRT only" lanes on many of our busiest streets.

This project is posed as three alternatives and costs over \$7 million to create plans as far as the draft environmental impact statement (which is still open for written public comment until Nov. 6).

The public presentations have heavily favored the BRT choice over the no-build and transportation system management options. Unfortunately, this "bus rapid transit" will be "bus riders trapped" in gridlock (along with those squeezed into the remaining lanes) for the most expensive in-town segment.

This plan is based on the notion that traffic flow will become more efficient by taking the two center lanes from busily traveled thoroughfares such as Dillingham, Kapiolani and Ward. These center lanes will then be supposedly reserved for an unspecified BRT bus. The new "express" BRT stops will also be in the middle of these busy streets.

On the other hand, local buses will continue in the right lanes, making their customary frequent stops, but with the BRT in place, there will often be no room to pass them.

Unfortunately, the city planners also seem to assume that everybody will stay in line as traffic backs up behind the bottlenecked and in the more restricted left-turn lanes too. It would seem obvious that

some fraction of the people stuck in traffic will pull into the relatively open center lanes either from frustration or by mistake.

Once in the restricted center lanes, they will have difficulty getting back — as they are surrounded by traffic and will probably have to proceed to the next intersection to get out.

These new BRT intersections will be quite a mess, as the motor savings, in time anticipated (without delays) depend on the BRT vehicles being able to turn the lights green when they actually reach the intersection.

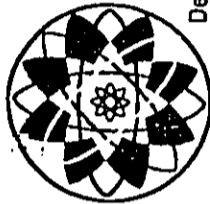
Any accidents that could easily occur at any of the many BRT intersections can again cause gridlock, which will spread like cancer to nearby streets — choking off the essential flow of people and products vital to our economy. Emergency and police vehicles will also face significant new problems.

City planners should test their assumption that the rest of the traffic will continue to flow after losing two lanes of many of our most traveled roads — by temporarily closing them off for a week.

This scientific approach is not unreasonable, as we will lose even more lanes during the construction period if this expensive project proceeds. Such a test may also be easily called off either a day or two, if this prediction is accurate.

Before we invest more public funds in the proposed BRT that will make conditions during morning and evening rush hour unbearable, I invite you to bring your opinions to the City Council hearing on these proposed changes, today at 6:30 p.m. at City Hall.

Wally Bachman  
Science Advisor  
Citizens Advocating Responsible Education



# C.A.R.E.

Citizens Advocating Responsible Education



November 14, 2000

Dear Members of the Special Transportation Committee

I urge you to reject Resolution 00-249 because it includes support for the most expensive part of Honolulu's transportation plan — the "In Town BRT".

I hope you have read my previous testimony of Oct. 26 and Letter to the Editor of the Honolulu Advertiser of the same day entitled "New bus plan will lead to city gridlock". Here is a summary of my previous testimonies:

First, the assumption that you can increase the carrying capacity in the primary transportation corridor by taking two lanes out of general public use on our busiest thoroughfares defies the laws of physics — as a lane that is usually empty cannot carry more people than one that is quite full, but still moving now during rush hours.

Secondly, traffic jams will be caused by having busses in four of the six lanes of Kapiolani and Dillingham Blvds. With the In Town BRT plan, the right lanes will still have local city busses in them, making their regular frequent stops — so that lane often does not move.

Then, what is now the middle lane becomes the left-turn lane. This will have a terrible impact on traffic because that central lane is now the only through lane. When the BRT gobbles up the two middle lanes, the through lane will be eliminated — as it becomes the new left-turn lane. Of course, traffic will back-up because it will become even more difficult to make a left turn with the BRT and its stations — in the middle of the street.

To find more evidence of this projected gridlock, I went through the two inches of documents and drawings that comprise the Draft EIS for this controversial project.

I was looking for the number of vehicles now using the roads where the new In Town BRT is supposed to go. While I was expecting a lane by lane, hour by hour tabulation — I was surprised to find no detailed data of existing traffic patterns on any of the major streets where the In Town BRT is now being planned.

Measuring the flow of vehicles now using these very busy lanes on Kapiolani, Dillingham, Ward and the H-1 is a very important step that should be the logical point to start a realistic engineering analysis of the proposed BRT.

Without any such measurement, the number of vehicles that will be displaced when turning the lanes over to the proposed BRT remains unknown. They all seem to magically vanish - as no serious mention of what happens to them can be found in this unscientific report.

The number of displaced vehicles is central to a true Environmental Impact Statement. By failing to count them and then ignoring the impact that these displaced vehicles will have on the surrounding streets and on the freeways - a completely distorted picture has been presented in the Draft EIS.

Thus, the entire Draft EIS report is just unrealistically optimistic conjecture that overlooks the likely problems that will arise through the creation of major new bottlenecks and simultaneously eliminating lanes now being used by the general public.

Resolution 00-249 supports this grossly misleading Draft EIS and should be defeated before we waste more public funds on a plan that has not done its basic background measurements. It also has not even considered the likely problems to arise when thousands of vehicles are evicted from our busiest roads - and forced onto other already crowded streets and freeways.

If you proceed with this illogical plan, you will find that BRT really does stand for "Bus Riders Trapped" in gridlock!

Sincerely yours,



Wally Bachman  
Science Advisor  
[wallyb4@aol.com](mailto:wallyb4@aol.com)



**C.A.R.E.**

Citizens Advocating Responsible Education

November 30, 2000



Toru Hamayasu  
Chief Transportation Planning Division  
711 Kapiolani Blvd., Suite 300  
Honolulu, HI 96813

Dear Toru,

Thank you very much for working late on the day before Thanksgiving and returning my calls to the Transportation Office for more specific information about the traffic flow rates on Kapiolani Blvd. - particularly the section between Ward Ave. and Atkinson Drive, where the BRT will take the two center lanes if it goes according to the present plan. This information was also requested by Richard Port at the conclusion of his testimony before the City Transportation Committee on Nov. 14, 2000.

I am enclosing a copy of the information that you conveyed to me during that conversation for your review for correctness. I would also like to know if this data appears in the Draft Environmental Impact Statement for the BRT, as I have a copy of the CD version that was distributed by your Department.

I believe this data is illogical because 1,600 vehicles per hour cannot just vanish from Kapiolani Blvd. (near the intersection with Piikoi - PM Peak) without having a significant environmental impact on the traffic flow - yet I could find no mention of these displaced vehicles in the Draft EIS. (4,000 vehicles/hour under the "No Build" Plan and 2,400 vehicles/hour with the BRT) Could you point out where this very significant problem of vehicle displacement is discussed in the Draft EIS?

Secondly, I still believe that this 1,600 vehicles per hour evicted from Kapiolani Blvd. figure derived from the data that you supplied to me on Nov. 22, 2000 - also underestimates the actual number to be displaced by the BRT because your data also assumes that the two lanes that are left for the general public to use can carry 1,200 vehicles per hour each. This also assumes that the existing city buses will still travel and stop in the right hand lanes, which will be shared with the general public.

Unfortunately, these regular city buses also back up traffic behind them whenever they stop to accept or discharge their passengers. If any turns are to be allowed, the left lane will also back up when people must wait for a clear path to make their left turns.

This data is unscientific because it has not been shown that two lanes can carry 2,400 vehicles per hour during peak periods. Because some of these vehicles will be city buses making their regular stops - this figure is unrealistic, and should be put to a test by coming off the BRT lanes temporarily to see how it will affect the remaining two lanes on Kapiolani Blvd.

I also thank you for providing me with a copy of the MEMORANDUM from Kenneth Banao on the subject of TRAFFIC COUNTS ON KAPIOLANI BOULEVARD just before the City Council Meeting began yesterday. The data of 2218 vehicles per hour in the 4 East Bound (Makal) Lanes for the P.M. Peak Hour was dated 12/24/94 - almost six years ago (555 vehicles/hr/lane). Did you find anything more recent?

I am also looking for some similar traffic counts and projections for Ala Moana Blvd. near Piikoi, to help gauge the impact that the second City Tram spur will have on traffic flow patterns in that area.

cc. Richard Port

Sincerely yours,

*Wally Bachman*

Wally Bachman  
Science Advisor  
C.A.R.E.

Summary of Traffic Flow Information received from Toru Hamayasu, Chief of Transportation Planning on Nov. 22, 2000 at 6:15 PM via telephone conversation:

KAPIOLANI BLVD. PEAK RATES (vehicles/hour)			
INTERSECTION	PLAN	MORNING PEAK RATE	# LANES & RATE/LANE
WARD	NO BUILD BRT	2,700 1,900	3 950 2 950
PIIKOI	NO BUILD BRT	3,700 2,500	3 1,233 2 1,250
KALAKAUA	NO BUILD BRT	3,500 3,600	4 875 4 900
WARD	NO BUILD BRT	3,400 2,500	4 850 2 1,250
PIIKOI	NO BUILD BRT	4,000 2,400	4 1,000 2 1,200
KALAKAUA	NO BUILD BRT	3,400 3,800	4 850 4 950

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JEREMY HARRIS  
MAYOR

CHERYL D. SOOHN  
DIRECTOR

GEORGE "KEOKO" MIYAMOTO  
DEPUTY DIRECTOR

Mr. Wally Bachman  
Page 2  
November 13, 2002

November 13, 2002

Mr. Wally Bachman, Science Advisor  
Citizens Advocating Responsible Education  
1235 Center Street  
Honolulu, Hawaii 96816

Dear Mr. Bachman:

Subject: Primary Corridor Transportation Project

This is in response to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your October 5, 2000 letter, your oral testimony at the October 5, 2000 Special Transportation Committee Meeting, your oral testimony at the formal public hearing, your October 12, 2000 letter, your October 26, 2000 letter, your letter to the Editor entitled, "New bus plan will lead to city gridlock" published October 26, 2000 in The Honolulu Advertiser, your October 26, 2000 oral testimony at the Special Transportation Committee Meeting, your November 14, 2000 letter, your oral testimony at the November 14, 2000 Special Transportation Committee Meeting, and your November 30, 2000 letter regarding the MIS/DEIS. Part B responds to your oral testimony at the April 20, 2002 public hearing regarding the SDEIS.

Part A - MIS/DEIS Comments

1. *How many bottlenecks (places where existing lanes are squeezed down - usually by losing two traffic lanes to make room for the new BRT lanes and platforms) will be created by the complete BRT system?*  
**Response:** See response to comment #4.
2. *What are the locations of each of these bottlenecks?*  
**Response:** See response to comment #4.
3. *How much extra commuting time will be added to drivers and passengers of automobiles, mopeds, motorcycles, school buses, four buses, trucks, and vans; and bus riders who use the existing city bus routes - by each of these new bottlenecks?*

**Response:** It is not the conversion of lanes that will create the congestion. The congestion for motorists will be there without the BRT. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

4. *How many lane-miles of existing public roads will be taken out of existing service, if the BRT is adopted? (For example, if two lanes of Kapiolani Boulevard are to be given to exclusive BRT use and no new lanes are taken from parking lanes, then for each mile of Kapiolani Boulevard given to the BRT, two lane miles would be taken out of service.)*

**Response:** Utilizing lanes for the BRT does not "take them out of service." It permits these lanes to carry a greater number of people than if the lanes were not converted. The distribution of lane miles would be as follows for the In-Town BRT: 10.0 for exclusive BRT use, 4.1 for shared use with other transit vehicles including private buses, and 2.6 shared use with right-turning vehicles. Along the remaining portions of the alignment (8.9 lane miles) the BRT would operate in mixed traffic. There are only 2.5 route miles (5.0 lane miles) where there would be two general-purpose traffic lanes on the same segment converted to exclusive BRT use. These are on Dillingham Boulevard, where street widening is proposed; and on Pensacola Street and University Avenue, where parking on both sides of the street would be removed to offset the lane conversions.

5. *How frequently do you expect that frustrated motorists caught in the gridlock created by these new bottlenecks will cross over into the open BRT lanes on these congested streets?*

**Response:** Although certainly not gridlock, congestion is forecast to occur even without the BRT lanes, so the system will include enforcement mechanisms to discourage private vehicles from entering BRT-priority lanes. Enforcement mechanisms will be in the form of a fine for entering a BRT-exclusive lane, similar to the fines imposed on the existing HOV lanes.

6. *Have you taken into consideration that vehicles that enter the new BRT lanes either by choice or by accident may have difficulty getting back into the jammed public lanes?*

**Response:** There will be no physical barriers between the BRT exclusive lanes and mixed traffic lanes. Therefore, if a motorist enters the lane by accident they will be able to move from an exclusive BRT lane to an adjacent lane when there is a break in traffic in the adjacent lane.

7. *Have you calculated the delays that such inevitable intrusions into the BRT lanes either by choice or by accident - into the projected expected savings in commuting times for BRT users?*

**Response:** If properly enforced, such intrusions, if they occur at all, will be rare and random events that will have a very limited impact on overall system delays and projected time savings for BRT passengers.

8. *Have you expected an increase in the noise level from horn honking that would accompany the gridlock created by all the new bottlenecks?*

**Response:** See response to comment #3.

9. *Have you expected an increase in road rage and other manifestations of frustration with increased traffic jams for automobiles, motorcycles, trucks, vans and other vehicles?*

**Response:** See response to comment #3.

10. How many parking spaces will be lost to the new BRT system?

**Response:** The In-Town BRT will affect approximately 373 unrestricted and 533 restricted on-street parking spaces, as disclosed in Section 4.4 of the Final EIS. Unrestricted spaces are currently available during peak and off-peak hours; restricted spaces are available only during designated off-peak periods. Some off-street parking spaces will also be affected in various places along the alignment. These partial displacements are described in detail in Section 5.2 of the Final EIS.

11. It was stated Monday that regular city buses will share the new curbside BRT lanes, but what time savings will remain if new BRT vehicles find the adjacent lane backed up and cannot pass the slower local buses that must stop in these new BRT lanes to accept and discharge passengers at the many bus stops that are along the BRT routes?

**Response:** The two candidate technologies, embedded plate and hybrid propulsion, both provide the flexibility to operate outside of the designated BRT lanes and therefore can maneuver around local buses and right-turning traffic, if necessary. On Kuhio Avenue in Waikiki the In-Town BRT will share the priority lanes with local buses and private buses. To accommodate the local transit service without blocking the transit lanes, bus pick-ups will be provided so that local buses and private buses can pull out of the bus lane to stop.

12. Have you calculated the negative impact on our ability to attract visitors by increasing noisy traffic jams and decreasing the amount of parking spaces (as many tourists also rent automobiles or mopeds or will get stuck in regular buses caught in the regular traffic lanes that will be snarled in gridlock if this plan is ever adopted)?

**Response:** See response to comment #3.

13. Have you considered closing off the proposed BRT lanes on these busy streets temporarily for one week, to observe the impact on the rest of the traffic? When will this trial to test this hypothesis begin?

**Response:** The proposed BRT system is based on ridership experience of the City's existing bus services, including the recently implemented express bus services that use much of the proposed BRT alignment, forecasts of BRT and local bus ridership using regional travel forecasting models, and input received at hundreds of public outreach meetings. A test without all features of the BRT system in place (i.e., limited stop operations in exclusive and semi-exclusive lanes using low-floor vehicles with level boarding through multiple doors and pre-payment of fares) would be misleading and not a true test of the system. For example, the proposed project to completely reconstruct Dillingham Boulevard through the Kaimali area to provide significant pedestrian amenities to facilitate access to BRT stations, as well as building new BRT stations and exclusive lanes in the center of the roadway. Without such major reconstruction, it would not be possible to provide the substantial time savings for transit riders through this corridor that would be offered by the BRT. Most importantly, potential new riders would not likely perceive the demonstration service as permanent and would not be induced to change their travel mode.

14. What we need is light rail. But that's already ruled out. So, let's look at this new system that's been offered. The two most important points are, one, you're going to have more noise from honking, from people stuck in the traffic, and...

**Response:** See response to comment #3.

15. Secondly, the last important point I have is that I'd like you to consider closing off the proposed BRT lanes on these busy streets temporarily for one week to observe the impact on the rest of the traffic and adopt the scientific approach which is to try it out. I mean, every day you go out here and you change the traffic pattern on Kapiolani three times. It's three different patterns out there. It wouldn't take much to close off these things with some of those cones and see what happens. You could try some City buses running up and down if you'd like or just leave it empty. I'm worried about the impacts on the rest of the traffic. I think it's all going to back up and it's going to cause gridlock.

**Response:** See response to comment #13.

16. On Monday, October 2, I voiced my original concern in that taking away existing public lanes from busy streets, such as Kapiolani Boulevard, Dillingham Boulevard and Ward Avenue, will only create bottlenecks.

**Response:** See response to comment #3.

17. These restrictions to existing traffic flow patterns - I think Richard Port talked about it, and I also agree with Dennis and Craig, who said that the light rail alternative would be much better.

**Response:** Light rail unless grade separated would have greater impacts to general purpose traffic than the BRT since it lacks the flexibility to around blockages along the alignment. If by "light rail" you are referring to elevated guideway transit, it was determined at the outset of the PCTP that the public was not in favor of elevated transit due to its high costs and visual impacts.

18. And one of the big bottlenecks will be on Kapiolani, right in front of the Convention Center, where the two new lanes start; also, on University Avenue, above Sinclair Circle, it should back up University Avenue; also, on the bottom of University Avenue, the corner with Kapiolani Boulevard, as people encounter the new BRT lanes.

**Response:** The Refined LPA as described in the FEIS contains modifications to the BRT corridor configurations that were initially proposed in the MISDEIS. Many of these modifications came about through discussions with the communities affected. As a result of these inputs, the UH-Manoa Branch of the In-Town BRT was modified to run in mixed-flow mode on Kapiolani Boulevard from Kahaka Street to University Avenue. This modification allowed contra-flow operation to continue on Kapiolani Boulevard, east of Alkinson Drive. On University Avenue, no BRT vehicles travel in exclusive lanes between Kapiolani Boulevard and South King Street. No traffic lanes are taken from University Avenue, so traffic flow on University is not greatly affected. Mauka of South King Street, the BRT is mostly in mixed-flow operation and would not displace any traffic lanes. These modifications are projected to greatly reduce the traffic impact of the In-Town BRT in the segments mentioned.

19. The most serious gridlock, I think, will probably develop along Dillingham Boulevard in front of HCC. There's only one lane left in each direction for all the other vehicles, including the buses. The local buses will have to share the one lane. And the loss of many miles of the public traffic lanes will also lead to people being able to use the roads less now with the traffic backing up.

**Response:** The Refined LPA also includes changes to the In-Town BRT along the Dillingham Boulevard corridor.

In Keolu provisions have been made to accommodate local bus service. Local transit service on Dillingham Boulevard will be maintained, thereby providing convenient transit access for those choosing not to utilize the BRT stops. To address the impacts of local buses stopping at bus stops, bus bays are proposed for the segment of Dillingham Boulevard between Kaaahli Street and Waialamalo Road. Between Waialamalo Road and Puuhale Road, Dillingham Boulevard is proposed to be widened to provide 18-foot traffic lanes. These lanes would be wide enough for through traffic to pass a local bus stopped at a bus stop or vehicles loading along Dillingham Boulevard. Forecasts of year 2025 peak hour traffic along Dillingham Boulevard indicate that the combination of mode shift to transit and capacity improvements on Nimitz Highway would enable Dillingham Boulevard to operate at comparable level of service with the exclusive BRT lanes implemented.

20. Unfortunately, one of the major faults in this plan is that it doesn't take into account human nature. Without any physical barriers to separate the lanes, some people will cross over into the open transit lanes, particularly if the remaining public lanes get all jammed up. Accidents and mistakes by people not familiar with this new system will also put non-transit vehicles in the CityTram lanes. Unfortunately, once they get into the center aisle, they may have difficulty getting back out, particularly when the adjacent lanes are all jammed up at rush hour. The result will be gridlock, where all the lanes will be jammed up.

**Response:** See response to comment #5.

21. This will also significantly increase the frequency of other unwanted behaviors including horn honking and road rage.

**Response:** See response to comment #3.

22. It will also impede or prevent emergency and police vehicles from doing their jobs.

**Response:** On the contrary, the proposed network of exclusive and semi-exclusive BRT lanes will greatly enhance emergency vehicle response times by providing an uncongested lane for such vehicles to reach incident locations. With proper emergency traffic signal preemptions in place, BRT vehicles will be able to move out of the exclusive lane at the nearest intersection to allow emergency vehicles to pass through the intersection unimpeded by either left turning or cross street traffic.

23. Before the City wastes considerably more money on the EIS, I believe they should try to come out the proposed - now the In-Town BRT lanes...try it for at least a week and observe the impact on the rest of the traffic. This would be the scientific approach. In other words, let's see what happens when you just put the cones down on these lanes, the center two lanes, down Dillingham, down Keolu, where I'm really concerned with other people there, and let's see how far the traffic backs up and how quickly it backs up. Maybe it will keep flowing. I don't know, I don't think so. But anyway, my opinion, it's going to back up. You have your opinion, you have your side show. Therefore, I'd like to see the test before more money is wasted on a project that I think cannot move anywhere.

**Response:** See response to comment #13.

24. The major bottleneck on Keolu Blvd. starts on Atkinson Drive (where two lanes in the Ewa direction will be lost if we adopt the CityTram or BRT). Traffic will therefore back up in front of the new Convention Center.

**Response:** See response to comment #18.

25. Some of the other major bottlenecks formed by the proposed CityTram include University Avenue above Sinclair Circle and also on the corner with Keolu Blvd.

**Response:** See response to comment #18.

26. Ward Ave. and King St. will get new delays, as will travelers along Ala Moana Blvd., Kuhio Ave., and Richards Street - as all will lose lanes now used by all vehicles, when they become restricted by prohibiting vehicles that use these busy lanes now.

**Response:** The Refined LPA includes a shift of the UH-Moana Branch of the In-Town BRT from Ward Avenue to Pensacola Street. The shift would allow the BRT to serve the McKinley High School/Kaiser Clinic area better and avoid the heavily utilized Ward Avenue. Traffic analyses located Chapter 4 of the FEIS indicate that the BRT could be accommodated on South King Street.

Parts of Ala Moana would operate with slightly higher congestion in the Refined LPA than in the No Build Alternative. However, these areas would be congested with or without the BRT, so the BRT provides an alternative mode through the congestion. The segment of Ala Moana Boulevard between Ala Wai Canal Bridge and Kalia Road would actually improve in the Refined LPA. In this alternative, it is proposed to widen Ala Moana Boulevard by one lane in each direction. The outside lanes would become semi-exclusive lanes, serving BRT vehicles, City buses, tour buses, and vehicles turning right into side streets or driveways.

The Refined LPA results in more congestion than the No Build on Kuhio Avenue. However, Kuhio Avenue is projected to operate in congested mode with or without the BRT. The BRT would provide an alternative mode and would work with current Waikiki Livable Communities concepts to narrow Kuhio Avenue to provide wide pedestrian promenades on Kuhio Avenue.

27. Comment repeated. See comment #19.

**Response:** See response to comment #19.

28. The loss of many miles of heavily used public traffic lanes for the proposed CityTram also will lead to less people being able to use the existing roads even if it works as planned, because most of the time the new CityTram lanes will be empty. During rush hour, they are now filled with people in various vehicles that are still moving. An empty lane obviously does not increase the total number of people in motion, and it is planned to be empty most of the time - if it works according to plan.

**Response:** In those places where some lanes will be dedicated for the exclusive use of BRT, the total people carrying capacity of the effective roadway will increase.

The BRT vehicles will operate at short intervals, as often as every two minutes or less during the morning and evening peak periods, and 4- to 8-minute intervals during off-peak hours. With a

standard occupancy level of 75 percent, each BRT vehicle will be carrying the equivalent number of passengers as 65 automobiles at a 1.2 passenger/automobile occupancy. Since a typical highly utilized arterial traffic lane carries about 500 vehicles per hour during peak periods, the BRT will be accommodating two to four times as many people as the adjacent traffic lane, depending on the frequency of BRT service along that section of the alignment.

29. Comment repeated. See comment #20.

Response: See response to comment #5.

30. Comment repeated. See comment #21.

Response: See response to comment #3.

31. Comment repeated. See comment #22.

Response: See response to comment #22.

32. There will also be 947 existing parking spaces lost to the new CityTram lanes, making the already scarce parking spaces even more difficult to find.

Response: With limited right-of-way, major streets should be used for moving people, not parking cars. In areas where a large concentration of parking spaces will be affected, replacement parking in new off-street parking facilities will be considered, but only if it meets other livable community objectives and is the result of community-based planning. For example, replacement parking will be considered for the neighborhood around University Avenue, where 78 on-street parking spaces will be lost. Each area of concern will be addressed on a case by case basis during the project's Final Design phase.

33. Before the City wastes considerably more money on the EIS, I believe they should try to come off the proposed BRT lanes on these busy streets temporarily for one week, to observe the impact on the rest of the traffic.

Response: See response to comment #13.

34. Beyond the gridlock predicted for rush hours, there is another error in the calculations of increased carrying capacity under the new system - even if everybody were to somehow stay out of the new "BRT only" lanes. At the present time, these lanes are full of various vehicles - particularly during the morning and evening rush hours. According to the proposed plan, most of the time the new BRT lanes would be empty. A sparsely used lane obviously does not increase the total number of people in motion - unless you are only counting bus riders and forgetting the rest of the people who use these busy streets.

Response: See response to comment #28.

35. My question is, where can one find the "Worst Case Scenario" section of the Draft Environmental Impact Statement? It seems that this document avoids discussing relevant problems that happen each day during rush hour.

Response: Many of the impact analyses contained in the EIS evaluate normal worst-case conditions. For example, the highway impact section in Chapter 4 of the MISDEIS describes the traffic conditions during A.M. and P.M. peak hours. It is not appropriate to evaluate unusual worst-case conditions such as traffic conditions during a traffic accident.

36. With the great number of negative consequences that would arise if gridlock regularly enlarges our busiest roads, I again repeat C.A.R.E.'s request that you come off the proposed BRT lanes on these busy streets temporarily for one week. This will enable us to observe the impact on the rest of the traffic and test whether this plan is even possible. I hope the City Council will soon adopt this scientific approach before money is wasted on an Environmental Impact Statement that will not be needed, if test results reveal this vision to be true.

Response: See response to comment #13.

37. The public presentations have heavily favored the BRT choice over the no-build and transportation system management options.

Response: A complete and balanced description and comparison of the No-Build Alternative, Transportation System Management (TSM) Alternative, and Bus Rapid Transit (BRT) Alternatives were presented in the MISDEIS and at the public hearing.

38. This plan is based on the notion that traffic flow will become more efficient by taking the two center lanes from busy traveled thoroughfares such as Dillingham, Kapiolani and Ward. These center lanes will then be supposedly reserved for an unspecified BRT bus. The new "express" BRT stops will also be in the middle of these busy streets. On the other hand, local buses will continue in the right lanes, making their customary frequent stops, but with the BRT in place, there will often be no room to pass them.

Response: In certain areas provisions would be made to accommodate local bus service. In Kaimali local transit service on Dillingham Boulevard will be maintained, thereby providing convenient transit access for those choosing not to utilize the BRT stops at McNeil or Alakawa Streets. To accommodate the local transit service without blocking the traffic lanes, 18-foot wide lanes are proposed on Dillingham Boulevard, west of Waiakamilo Road. This is sufficient width for traffic to go around the stopped bus. East of Waiakamilo Road, bus pullouts will be provided so that local transit can pull out of the way of vehicular traffic.

On the section of Kapiolani Boulevard with two exclusive BRT lanes, there will be two general purpose traffic lanes in each direction as well as the exclusive BRT lanes. Motorists will be able to use the adjacent lane to go around stopped buses.

With the Refined LPA the BRT alignment has been moved from Ward Avenue to Pensacola Street. Since the makah-bound BRT lane will be curbside on Pensacola, local buses will share the BRT stop.

39. Unfortunately, the city planners also seem to assume that everybody will stay in line as traffic backs up behind the bottlenecks and in the more restricted left-turn lanes too. It would seem obvious that some fraction of the people stuck in traffic will pull into the relatively open center lanes either from frustration or by mistake.

Response: See response to comment #5.

40. Once in the restricted center lanes, they will have difficulty getting back - as they are surrounded by traffic and will probably have to proceed to the next intersection to get out. These new BRT intersections will be quite a mess, as the major savings in time anticipated (without delays) depend on the BRT vehicles being able to turn the lights green when they actually reach the intersection.

**Response:** There would be no physical barriers between the BRT exclusive lanes and mixed traffic lanes. Therefore, in a blockage situation motorists will be able to move from an exclusive BRT lane to an adjacent lane when there is a break in traffic in the adjacent lane. Traffic signals will not be pre-empted by the BRT. At certain intersections, BRT vehicles approaching a green signal will activate a 10-second extension of the green indication for that cycle only.

41. Any accidents that could easily occur at any of the many BRT intersections can again cause gridlock, which will spread like cancer to nearby streets - choking off the essential flow of people and products vital to our economy. Emergency and police vehicles will also face significant new problems.

**Response:** The two candidate technologies, embedded plate and hybrid-electric propulsion, both provide the flexibility to operate outside of the designated BRT lanes and therefore can easily maneuver around accident sites, emergency vehicles and traffic. Also, the proposed network of exclusive and semi-exclusive BRT lanes would greatly enhance emergency vehicle response times providing an uncongested lane for such vehicles to reach incident locations.

42. City planners should test their assumption that the rest of the traffic will continue to flow after losing two lanes of many of our most traveled roads - by temporarily closing them off for a week.

**Response:** See response to comment #13.

43. Unfortunately, when the BRT goes in taking two lanes out of the major thoroughfares like Kapiolani and King Street, where are all those displaced cars supposed to go. Back on the freeway making conditions up there worse? I don't know.

**Response:** See response to comment #3.

44. Even if one assumes that all these people are going to stay out of these new BRT lanes, which I think is a false assumption, you can't expect everybody to stay out of these lanes. They're going to get in there either from accident or frustration. They're going to pull in there and once they get in there, how do they get out. Walled in by traffic. The only way to get out is go down to the next intersection and these intersections are going to be something else. So, then they're going to be all tied up there and backed up both ways.

**Response:** See response to comment #40.

45. I think you have to put in extra lanes. You cannot solve the problems that exist by just trying to jam it up more with more buses on the same old streets.

**Response:** There is insufficient room within the existing roadway right-of-way to accommodate additional lanes. The alignment and elements of the Refined LPA are designed to be predominately within the existing roadway right-of-way in order to minimize right-of-way takes.

46. So again, I repeat in summary that if you think this is going to work, please come off these lanes for a week, maybe a day or two before everybody screams and hollers that this cannot work.

**Response:** See response to comment #13.

47. First, the assumption that you can increase the carrying capacity in the primary transportation corridor by taking two lanes out of general public use on our busiest thoroughfares defies the laws of physics - as a lane that is usually empty cannot carry more people than one that is quite full, but still moving now during rush hours.

**Response:** See response to comment #28.

48. Secondly, traffic jams will be caused by having buses in four of the six lanes of Kapiolani and Dillingham Blvd. With the In-Town BRT plan, the right lanes will still have local city buses in them, making their regular frequent stops - so that lane often does not move. Then, what is now the middle lane becomes the left-turn lane. This will have a terrible impact on traffic because that central lane is now the only through lane. When the BRT gobbles up the two middle lanes, the through lane will be eliminated - as it becomes the new left-turn lane. Of course, traffic will back up because it will become even more difficult to make a left turn with the BRT and its stallions - in the middle of the street.

**Response:** Left-turn lanes will be provided along Dillingham and Kapiolani Boulevards such that the scenario described would not occur.

49. To find more evidence of this projected gridlock, I went through the two inches of documents and drawings that comprise the Draft EIS for this controversial project. I was looking for the number of vehicles now using the roads where the new In-Town BRT is supposed to go. While I was expecting a lane by lane, hour by hour tabulation - I was surprised to find no detailed data of existing traffic patterns on any of the major streets where the In-Town BRT is now being planned. Measuring the flow of vehicles now using these very busy lanes on Kapiolani, Dillingham Ward and other very busy thoroughfares, would be the logical point to start a realistic environmental impact analysis. Without any such measurement, the number of vehicles that will be displaced when turning the lanes over to the proposed BRT remains unknown. They all seem to magically vanish - as no serious mention of what happens to them can be found in this unscientific report.

**Response:** Chapter 4 of the FEIS shows quantitatively the effects of converting designated lanes to priority use by transit vehicles.

50. The number of displaced vehicles is central to a true Environmental Impact Statement. By failing to count them and then ignoring the impact that these displaced vehicles will have on the surrounding streets and on the freeways - a completely distorted picture has been presented in the Draft EIS.

**Response:** See response to comment #49.

51. Thus, the entire Draft EIS report is just unrealistically optimistic conjecture that overlooks the likely problems that will arise through the creation of major new bottlenecks and simultaneously eliminating lanes now being used by the general public.

**Response:** See response to comment #3.

52. Resolution 00-249 supports this grossly misleading Draft EIS and should be defeated before we waste more public funds on a plan that has not done its basic background measurements. It also has not even considered the likely problems to arise when thousands of vehicles are evicted from our busiest roads - and forced onto other already crowded streets and freeways.

**Response:** On November 29, 2000, the City Council adopted Resolution 00-249 identifying the Bus Rapid Transit (BRT) Alternative as the Locally Preferred Alternative (LPA).

53. I would also like to know if this data (summary of traffic flow along Kapiolani Blvd.) appears in the Draft Environmental Impact Statement for the BRT, as I have a copy of the CD version that was distributed by your Department.

**Response:** The referenced information does not appear in the MIS/DEIS; however, it is included in the FEIS.

54. I believe this data (summary of traffic flow along Kapiolani Blvd.) is illogical because 1,600 vehicles per hour cannot just vanish from Kapiolani Blvd. (near the intersection with Pāhō - PM Peak) without having a significant environmental impact on the traffic flow - yet I could find no mention of these displaced vehicles in the Draft EIS. (4,000 vehicles/hour under the "No Build" Plan and 2,400 vehicles/hour with the BRT). Could you point out where this very significant problem of vehicle displacement is discussed in the Draft EIS?

**Response:** Table 4.4-6 in Chapter 4 of the FEIS summarizes the differences in traffic volumes on roadways parallel to Kapiolani Boulevard. The magnitude of the traffic volumes is different from those shown in the MIS/DEIS due to the use of an updated version of the Oahu Metropolitan Planning Organization (OMPO) travel demand forecasting model. This most recent version of the model was used for the update of the Oahu Regional Transportation Plan (ORTP). The FEIS utilized this updated model to be consistent with the regional transportation agency data.

55. Secondly, I still believe that this 1,600 vehicles per hour evicted from Kapiolani Blvd. figure derived from the data that you supplied to me on Nov. 22, 2000 - also underestimates the actual number to be displaced by the BRT because your data also assumes that the two lanes that are left for the general public to use can carry 1,200 vehicles per hour each.

**Response:** See response to comment #54.

56. This also assumes that the existing city buses will still travel and stop in the right hand lanes, which will be shared with the general public. Unfortunately, these regular city buses also back up traffic behind them whenever they stop to accept or discharge their passengers. If any turns are to be allowed, the left lane will also back up when people must wait for a clear path to make their left turns.

**Response:** Typically where local buses will be operating on the same street as the BRT, they will be operating in mixed traffic. If there are not multiple lanes, bus turnouts or extra-wide lanes are being proposed so that motorists will not have to wait behind stopped buses.

57. This data is unscientific because it has not been shown that two lanes can carry 2,400 vehicles per hour during peak periods. Because some of these vehicles will be city buses making their regular stops - this figure is unrealistic, and should be put to a test by closing off the BRT lanes temporarily to see how it will affect the remaining two lanes on Kapiolani Blvd.

**Response:** See response to comment #13.

58. I also thank you for providing me with a copy of the MEMORANDUM from Kenneth Banao on the subject of TRAFFIC COUNTS ON KAPĪOLANI BOULEVARD just before the City Council Meeting began yesterday. The data of 2218 vehicles per hour in the 4 East Bound (Makai) Lanes for the P.M. Peak Hour was dated 12/24/94 - almost six years ago (555 vehicles/hour). Did you find anything more recent?

**Response:** More recent traffic data is used in the FEIS.

59. I am also looking for some similar traffic counts and projections for Ala Moana Blvd. near Pāhō, to help gauge the impact that the second City Tram spur will have on traffic flow patterns in that area.

**Response:** See response to comment #58.

#### Part B - SDEIS Comments

60. I started speaking against this plan a year and a half ago, and I was already a latecomer since I was told that the plans had been developed three years previously to that.

**Response:** We appreciate you taking the time to attend the public hearing and express your views regarding the project.

61. And when I found out more about the community discussions that led up to this plan, I was surprised to find out that any kind of fixed rail was already ruled out, you couldn't consider any kind of fixed rail in all these discussions that led to the system. And I think that's why we got this system.

**Response:** A grade separated rail system was eliminated at the outset by the public and the City Council as being too costly and unsightly.

62. Because I am also from New York, and I find that it was much better to take the subway usually, because that kind of system is dependable. When you have a fixed rail system, you can have fairly dependable schedules, and it doesn't - it's not held up by all the different traffic lights.

**Response:** There is no question that a subway is faster and more reliable than an at-grade system. A subway system is not an option for Honolulu.

63. This was originally called the City Tram, and then they changed the name to Bus Rapid Transit, because the initials are now BRT, which is very similar to - and the BRT sounds a lot like BART, which is in San Francisco, which is a fixed rail system. It's very nice, it's very quiet, it's very good.

**Response:** The official project name is the Primary Corridor Transportation Project and the alternatives considered through the process have always referred to bus rapid transit or BRT.

Mr. Wally Bachman  
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64. But our system is no way anywhere close to the BART, the BART in San Francisco. Instead of that, we get something that's much more similar to the cable car system, which is so slow, you can walk faster most of the time, because it stops at every traffic light.

**Response:** Unlike the San Francisco cable cars, the proposed In-Town BRT will achieve relatively fast speeds by offering limited stop service in priority lanes, with level boarding from multiple doors.

65. Now, the trouble with this system is, again, if anything happens, any big accident at an intersection, the system goes down. You're held up with the same traffic, you're held up by the buses that are in front of you, which often will be other kinds of City buses.

**Response:** The BRT buses will only be impacted if the BRT lane is affected by the accident. In the rare instance where the whole intersection is tied-up, the BRT buses have the flexibility to go around blockages.

66. And they assume that you can pass around them, but this might not be practical, particularly in rush hour, because then those lanes will be blocked with other vehicles. And since there is no dependability to having a rapid transit, that then this is a glorified bus system.

**Response:** The accident situation described would not be of such frequent occurrence as to render the proposed system "undependable".

67. I think the money would be much better spent and just - maybe if there's not enough buses, if they add some more buses.

**Response:** The City does plan to expand the existing bus fleet as necessary.

68. Again, I'd like to thank the planners for eliminating, from the first phase, the places that I thought would be getting the most trouble, which is Dillingham, particularly near Honolulu Community College, and the old Kepoiian route, which is going to be held off for the first year. Those are the places where I thought there'd be the most trouble, and they're not going to be in the first year of this program. And I want to commend them for deleting them. But I think they're not - not to be temporarily deleted, because it will not work in those areas, because they cannot afford to give up lanes in those very heavily traveled roads, particularly in the rush hour.

**Response:** See response to comment #3.

69. Finally, I'd like to - not finally. Two more points. One is that I'm still not sure what's going to happen to bicycles that are now on the right-hand side, when these vehicles take up the right-hand side. I haven't had much discussion of what happens to bicycles or mopeds. And mopeds mostly stay in the traffic. But bicycles on the right-hand side, I'm not sure where they're going to go. Do they have to go in the middle of the road then? It would be very impractical for bicycles.

**Response:** Implementing the In-Town BRT will improve city streets for cyclists because they will be allowed to use the wider curbside In-Town BRT lanes if no bike lanes are provided on that section of street. In addition, the Refined LPA will maintain bike lanes wherever they exist today or are planned for in the Honolulu Bicycle Master Plan or the State Bike Plan Hawaii.

Mr. Wally Bachman  
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70. And finally, I think they should look a little bit more at the experimental Kaimuki trolley system, which doesn't take exclusive lanes, but it's taking about a million dollar subsidy. They are running on time. But ever time they come up to Kaimuki, there's one or two people on it. And if people aren't going to give up their cars and take the trolley, which only costs one dollar, why do you think that everybody is going to flock to this BRT when it could be just as slow as the regular bus system? That's it.

**Response:** The Kaimuki trolley was implemented primarily to attract tourists to the Kaimuki business district. It has no relevancy to the In-Town BRT which is designed to serve the resident population.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6876. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE NAKAGAWA  
DEPUTY DIRECTOR

TPD4102-01508R

November 13, 2002

Mr. Roy Yamashiro  
President  
American Council of Engineering Companies of Hawaii  
P. O. Box 88840  
Honolulu, Hawaii 96830

Dear Mr. Yamashiro:

Subject: Primary Corridor Transportation Project

This is in response to the April 19, 2002 testimony regarding your organization's comment on the Supplemental Draft Environmental Impact Statement (SDEIS).

We support the goals of BRT to improve mobility in Honolulu, foster livable communities, and strengthen the connections within the city and from outlying areas. The BRT will provide transit alternatives for the residents and visitors in Honolulu. Having a clean, efficient, modern, dependable public transit system is an important component in making Honolulu a livable city, and laying the groundwork for transportation infrastructure for our future generations. Thank you for allowing me to testify today.

Response: We concur and thank you for supporting the BRT project.  
We appreciate your interest in the project.

Sincerely,

*Ceryl D. Soon*  
CHERYL D. SOON  
Director

**ACEC**  
American Council of Engineering Companies

Consulting Engineers Council of Hawaii

April 19, 2002

Ms. Cheryl D. Soon  
Director of Transportation Services  
City & County of Honolulu  
650 South King Street  
Honolulu, Hawaii 96813

Subject: **TESTIMONY IN SUPPORT OF SDEIS FOR BUS RAPID TRANSIT**

My name is Ken Hayashida, President of the Consulting Engineers Council of Hawaii (CECH). I am speaking in support of SDEIS for the Bus Rapid Transit (BRT) project.

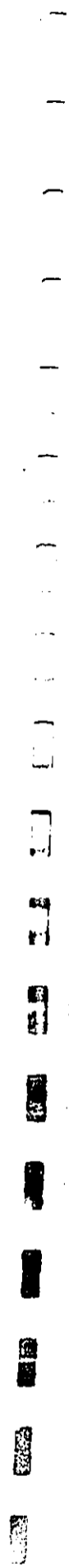
We support the goals of BRT are to improve mobility in Honolulu, foster livable communities, and strengthen the connections within the city and from outlying areas. The BRT will provide transit alternatives for the residents and visitors in Honolulu. Having a clean, efficient, modern, dependable public transit system is an important component in making Honolulu a livable city, and laying the groundwork for transportation infrastructure for our future generations. Thank you for allowing me to testify today.

Ken K. Hayashida, President  
Consulting Engineers Council of Hawaii

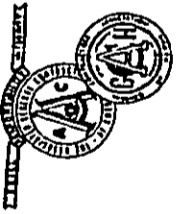
*Ken K. Hayashida*

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**GENERAL CONTRACTORS ASSOCIATION OF HAWAII**  
2015 ALAHA STREET • HONOLULU, HAWAII 96813-4493 • TELEPHONE 832-1641

October 26, 2000

Primary Corridor Transportation Project  
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already approved in the Kalaheo, Kapolei, Ewa, Waikale, Waipahu, Pearl City, Pearl Harbor, Kailua, Downtown, Kakaako, Ala Moana, and Waikiki areas. So travel along this corridor will only increase in the future.

In 1982, the typical Oahu driver experienced 14 hours of delay time per year. In 1997 this number more than doubled to 29 hours per year. This equates to 25 million gallons of wasted fuel per year. The No Build and TSM alternatives will do very little to improve our mobility, strengthen island wide connections, and foster livable communities. In fact our situation will only get worse. In all likelihood, we will be faced with 12 hours of peak traffic, gridlock, and communities facing increased air, water, noise and ground pollution.

The BRT alternative offers a coordinated macro solution to not only our transportation needs, but also preserving or even improving our quality of life and protecting our environment for future generations. It introduces the use of electric or hybrid diesel / electric powered vehicles, at least in the In-Town section, and coordinates and encourages the use of bicycles and walking. This is a major step in using alternate sources of energy for our transportation needs.

There will be some, along the corridor, that will be affected by traffic pattern changes or relocations. But what is better to have? Efficient, quiet transportation, improved quality of our environment and neighborhoods, or grid lock, noise and pollution for the sake of not changing our traffic patterns and our lifestyles.

Though the capital cost of the BRT system at \$1 billion is three times the cost of a No Build alternative and double the cost of the TSM system, it can be spread over an affordable period of time and receive substantial federal funding. Of the dedicated lane or fixed rail alternatives, it is the least costly and most flexible.

If we do not start investing in our future through innovative, environmentally and socially conscious alternatives, we will pay for it in wasted time, aggravation, crime, traffic fatalities and environmental damage.

The General Contractors Association of Hawaii supports the BRT Alternative presented in the Major Investment Study / Draft Environmental Impact Statement for the Primary Corridor Transportation Project.

We thank you for this opportunity to testify.

Yours truly,

Glenn M. Nohara  
Chairman, GCA of Hawaii Legislative Committee

TO: Chair Duke Bainum and Members of the City Council Transportation Committee

Subject: Primary Corridor Transportation Project MIS / DEIS dated August 2000

Dear Chair Bainum and Members of the City Council Transportation Committee:

The General Contractors Association of Hawaii (GCA), an organization composed of 470 general contractors, subcontractors and construction related firms, supports the Bus Rapid Transit (BRT) Alternative presented in the Major Investment Study (MIS) / Draft Environmental Impact Statement (DEIS) for the Primary Corridor Transportation Project.

The community visioning meetings and Oahu Trans 2K workshops established three points of agreement that a transportation system needed to achieve. These were 1) Improve mobility; 2) Strengthen island-wide connections; and 3) Foster livable communities.

After four rounds of meetings with community groups, three alternatives emerged. These were:

1. **No Build:** This alternative would include roadway projects committed to implementation in the next three years and expansion of the bus and van pool service.
2. **Transportation System Management (TSM):** This would reconfigure the present bus route network to a hub-and-spoke network.
3. **Bus Rapid Transit (BRT):** This alternative builds on the hub-and-spoke bus system and adds Regional and In-Town BRT elements. The In-Town element between Middle Street and UH Manoa and Waikiki would involve dedicated lanes with electric or hybrid diesel / electric technology.

It is our opinion the BRT alternative, by far, addresses the three points of agreement established from the visioning meetings and Oahu Trans 2K workshops.

The area affected by the Primary Corridor project encompasses more than 60 percent of the island's population and more than 80 percent of its employment. Furthermore, there are several residential, commercial and industrial developments ongoing or

A Full Service Chapter of the  
Associated General Contractors of America, Inc.

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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HONOLULU, HAWAII 96813  
Phone: (808) 525-4379 • Fax: (808) 525-4720 • Internet: www.cc.honolulu.hi.us



CHERYL D. SOON  
DIRECTOR  
GEORGE KEOU'ILEVALUOTO  
DEPUTY DIRECTOR

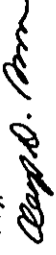
JEREMY HARRIS  
MAYOR

Mr. Glenn M. Nohara  
Page 2  
November 13, 2002

5. *The General Contractors Association of Hawaii supports the BRT Alternative presented in the Major Investment Study / Draft Environmental Impact Statement for the Primary Corridor Transportation Project.*

**Response:** Comment noted. It states the commenter's preference for an LPA.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,  
  
CHERYL D. SOON  
Director

November 13, 2002

Mr. Glenn M. Nohara, Chairman  
GCA of Hawaii Legislative Committee  
1065 Ahua Street  
Honolulu, Hawaii 96819

Dear Mr. Nohara:

**Subject: Primary Corridor Transportation Project**

This is in response to your October 29, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MISDEIS).

1. *The community visioning meetings and Oahu Trans 2K workshops established three points of agreement that a transportation system needed to achieve. These were 1) improve mobility; 2) Strengthen islandwide connects; and 3) Foster livable communities. It is our opinion the BRT alternative, by far, addresses the three points of agreement established from the visioning meetings and Oahu Trans 2K workshops.*

**Response:** Comment noted. The project agrees with this statement.

2. *The BRT alternative offers a coordinated macro solution to not only our transportation needs, but also preserving or even improving our quality of life and protecting our environment for future generations. It introduces the use of electric or hybrid diesel/electric powered vehicles, at least in the In-Town section, and coordinates and encourages the use of bicycles and walking. This is a major step in using alternate sources of energy for our transportation needs.*

**Response:** Comment noted. The comment agrees with the MISDEIS.

3. *There will be some, along the corridor, that will be affected by traffic pattern changes or relocations. But what is better to have? Efficient, quiet transportation, improved quality of our environment and neighborhoods, or grid lock, noise and pollution for the sake of not changing our traffic patterns and our lifestyles.*

**Response:** Comment does not require a response since commenter is addressing City Council.

4. *Though the capital cost of the BRT system at \$1 billion is three times the cost of a No Build alternative and double the cost of the TSM system, it can be spread over an affordable period of time and receive substantial federal funding. Of the dedicated lane or fixed rail alternatives, it is the least costly and most flexible.*

**Response:** The comment is in agreement with the MISDEIS and FEIS.



May 8 2002



**Date:** 5.7.2002

**To:** Ms. Cheryl D. Soon, Director  
Department of Transportation Services

**Fax #:** 523-4730

**From:** Darci Evans, Administrative Assistant  
HAWAII ACTIVITIES AND TOURS ASSOCIATION

**Subject:** Primary Corridor Transportation Project -- BRT

I am faxing 2 pages (including cover sheet). If there's a problem in the transmit-  
tal, please call me at 524-6424 or e-mail me at "darc@haataa.org". Mahalo.

**MESSAGE:**

Comments for City & County of Honolulu and the Federal Transit Administration

PMB 3101, 375 COOKE STREET #A HONOLULU, HI 96813 • PH 524-6424 • FAX 543-6066  
WEBSITE: HAATAA.ORG E-MAIL: INFO@HAATAA.ORG



**RE: BUS RAPID TRANSIT FUNDING**

- No members of the Hawaii Activities and Tours Association who responded to a recent poll about street closures were in favor of the Waikiki leg of the proposed Bus Rapid Transit.
- A BRT in Waikiki would inconvenience all except the Tram riders. Besides hindering services, the BRT would also be in direct competition to private sector transportation operations — displacing the private sector is against federal law.
- Why is approval of this ill-conceived idea being rushed? Some HAATA members report that meetings regarding the system have been one-sided presentations and not opened to dialogue. Also, many questions brought up have gone unanswered by the City's Department of Transportation Services. The planning process has been anything but "open" — it has been instead a closed-minded process.
- We question why the in-town portion being pushed to be built first. The part of the population which needs the most servicing it is outlying population... the "suburbs"... which in the case of the BRT is the Leeward/Central/Ewa side.
- It is felt that the City has orchestrated traffic congestion in Waikiki... namely 1) predominance of one-way streets; 2) the permanent closure of a lane on Kalakaua Avenue; 3) incorrectly "synchronized" traffic lights that don't allow for maximum efficiency traffic flow; 4) and not choosing to add a lane on Ala Moana Blvd. entering onto Kalakaua, which the State had wanted to do.

PMB 3101, 375 COOKE STREET #A HONOLULU, HI 96813 • PH 524-6424 • FAX 543-6066  
WEBSITE: HAATAA.ORG E-MAIL: INFO@HAATAA.ORG

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**

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JERELYN HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE WEDOKI \*MIYAMOTO  
DEPUTY DIRECTOR

TPD502-01865R

November 13, 2002

Ms. Dardl Evans  
Administrative Assistant  
Hawaii Activities and Tours Association  
575 Cooke Street, #A  
Honolulu, Hawaii 96813

Dear Ms. Evans:

Subject: Primary Corridor Transportation Project

This is in response to your May 7, 2002 letter regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. No members of the Hawaii Activities and Tours Association who responded to a recent poll about street closures were in favor of the Waikiki leg of the proposed Bus Rapid Transit.

Response: There will be no street closures as a result of implementing the BRT project.

2. A BRT in Waikiki would inconvenience all except the Tram riders. Besides hindering services, the BRT would also be in direct competition to private sector transportation operations - displacing the private sector is against federal law.

Response: Comment noted. It is a statement of opinion. The public transit system complies with all federal regulations.

3. Why is approval of this ill-conceived idea being rushed?

Response: The Primary Transportation Corridor Project was initiated in September 1998 and has involved over 200 meetings. Using an extensive public outreach process for over four years since its inception there has been continual progress made in evaluating alternatives and in defining the best transit solution for the primary corridor. One could hardly call this a "rushed" process.

4. Some HAATA members report that meetings regarding the system have been one-sided presentations and not opened to dialogue. Also, many questions brought up have gone unanswered by the City's Department of Transportation Services. The planning process has been anything but "open" - it has been instead a close-minded process.

Response: There have been hundreds of public meetings regarding the project, plus the six working groups that were formed in the areas along the BRT corridor. Except where the format prohibited it, all of these meetings involved open dialog that resulted in project refinements as analyzed in the SDEIS

Ms. Dardl Evans  
Page 2  
November 13, 2002

5. We question why the in-town portion being pushed to be built first. The part of the population which needs the most servicing is its outlying population ... the "suburbs" ... which in the case of the BRT is the Leeward/Central/Ewa side.

Response: Timing and implementation of the P.M. zipper lane and related Regional BRT improvements must be coordinated with the State DOT. SDOT wants to widen the H-1 Freeway in the areas where the P.M. zipper lane is proposed before installing the zipper lane. Since the Waikiki segment of the In-Town BRT can be a viable improvement to the transit system immediately, the City Council has elected to proceed with this segment as the first step in phasing of the BRT system.

6. It is felt that the City has orchestrated traffic congestion in Waikiki - namely 1) predominance of one-way streets; 2) the permanent closure of a lane on Kalakaua Avenue; 3) incorrectly "synchronized" traffic lights that don't allow for maximum-efficiency flow; 4) and not choosing to add a lane on Ala Moana Blvd. entering onto Kalakaua, which the State had wanted to do.

Response: The City continually works to enhance transportation and does not orchestrate traffic congestion.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director



**HAWAII ATTRACTIONS ASSOCIATION**

615 Piikoi Street, Suite 1812 • Honolulu, HI 96814  
(808) 596-7733 • Fax (808) 596-2277  
WebSite: <http://www.HawaiiAttractions.com>  
E-Mail: [aloha@hawaiiattractions.com](mailto:aloha@hawaiiattractions.com)

November 6, 2000

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
711 Kapiolani Blvd., Suite 1200  
Honolulu, HI 96813

Dear Ms. Soon:

Thank you for taking the time to meet with our Board of Directors regarding the O'ahu Trans 2K Plan.

We believe that the BRT is the preferred option, however want to express our concern as it relates to Waikiki.

Since the majority of attractions are located outside of Waikiki, the ability for us to transport visitors to and from Waikiki with ease is of the utmost importance. We strive to accommodate our visitors needs with convenience, comfort and aloha.

The current plan proposes taking the makai lane of Kalakaua for the BRT tram. The City is proposing that this lane can be a shared lane with tour buses and trolleys.

We would like the opportunity to continue to dialog with you on this issue. Ideally, the plan that is implemented should benefit both residents and visitors.

Thank you for your consideration.

Sincerely,

Bob Taylor  
Chairman of the Board

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE KEONI'IAI'ALUOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD1100-05410R

Mr. Bob Taylor, Chairman of the Board  
Hawaii Attractions Association  
615 Piikoi Street, Suite 1812  
Honolulu, Hawaii 96814

Dear Mr. Taylor:

Subject: Primary Corridor Transportation Project

This is in response to your November 6, 2000 letter regarding your comment on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

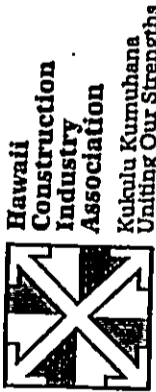
Since the majority of attractions [is] located outside of Waikiki, the ability for us to transport visitors to and from Waikiki with ease is of the utmost importance. We strive to accommodate our visitors' needs with convenience, comfort and aloha. The current plan proposes taking the makai side of Kalakaua for the BRT tram. The City is proposing that this lane can be a shared lane with tour buses and trolleys. We would like the opportunity to continue to dialog with you on this issue. Ideally, the plan that is implemented should benefit both residents and visitors.

Response: It is the City's intent to share the makai curb lane on Kalakaua Avenue with private buses and trolleys.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director



**Hawaii  
Construction  
Industry  
Association**

Kukulu Kumuhana  
Uniting Our Strengths

**TESTIMONY IN SUPPORT OF BUS RAPID TRANSIT**

**PUBLIC HEARING  
NEAL BLAISSELL CENTER HAWAII ROOM  
OCTOBER 12, 2000**

The Hawaii Construction Industry Association (HCIA) is a joint cooperative organization established in 1985 and is the largest construction organization in Hawaii representing both labor and management. HCIA's Board of Directors represent nine Hawaii construction trade unions and ten Hawaii contractor organizations employing union labor. Our member organizations and more than 600 companies employ over 20,000 people in the Hawaii construction industry who are responsible for more than 75% of all the construction work performed in our state.

Construction has not fully recovered in Hawaii. Our industry has lost over 30% of our workers over the last nine years, a total of over 10,000 jobs. Construction related unemployment claims also make up 28% of all claims, the largest percentage of unemployment claims of any industry in Hawaii, according to the State Department of Labor.

The construction industry supports the Bus Rapid Transit Alternative. It is the best choice for quickly and efficiently improving the travel times for the most number of people. These projects could be funded heavily with Federal dollars, and should create about 3,000 jobs just for the construction industry. These additional jobs in the local construction industry will greatly stimulate economic activity as the construction money passes hands several times in the local economy and creates a multiplier effect that will benefit the entire state.

The improved transportation in our communities will also greatly increase personal freedom, mobility, and people's choices, just as it will reduce costs for shipping and transportation of goods and services. Business will be helped by a better transportation infrastructure that speeds up deliveries and brings in new customers. An improved transportation system is vital to our tourist industry. Without updating our infrastructure, Hawaii will continue to fall behind other destinations in providing a safe and comfortable experience for potential travelers to enjoy.

Oahu Trans2K has done its homework, conducted numerous rounds seeking community input, and tried to be responsive to island-wide community needs. The public, especially the large number who are not able to drive, overwhelmingly support this project and want it now. Please support this win-win proposal for our community.

Aloha,

Brian Lee  
Executive Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 522-4528 • Fax: (808) 522-4720 • Internet: www.cd.honolulu.hi.us



JEREMY HARRIS  
MAYOR

CHERYL D. SOOCH  
DIRECTOR

GEORGE REARD • LUTALUATO  
DEPUTY DIRECTOR

November 13, 2002

Mr. Brian Lee, Executive Director  
Hawaii Construction Industry Association  
2828 Paa Street, #3115  
Honolulu, Hawaii 96819

Dear Mr. Lee:

Subject: Primary Corridor Transportation Project  
This is in response to your October 12, 2000 letter and oral testimony at the formal Public Hearing regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. The construction industry supports the Bus Rapid Transit Alternative. It is the best choice for quickly and efficiently improving the travel times for the most number of people.  
Response: Comment noted. It states the commenter's preference for an LPA.
2. These projects could be funded heavily with Federal dollars, and should create about 3,000 jobs just for the construction industry. These additional jobs in the local construction industry will greatly stimulate economic activity as the construction money passes hands several times in the local economy and creates a multiplier effect that will benefit the entire state.  
Response: Comment noted. The project agrees with these statements.
3. The improved transportation in our communities will also greatly increase personal freedom, mobility, and people's choices, just as it will reduce costs for shipping and transportation of goods and services.  
Response: Comment noted. It is a statement of opinion.
4. Business will be helped by a better transportation infrastructure that speeds up deliveries and brings in new customers.  
Response: Comment noted. It is a statement of opinion.
5. An improved transportation system is vital to our tourist industry. Without updating our infrastructure, Hawaii will continue to fall behind other destinations in providing a safe and comfortable experience for potential travelers to enjoy.  
Response: Comment noted. It is a statement of opinion.



Mr. Brian Lee  
Page 2  
November 13, 2002

6. We feel the Oahu Trans 2K has done its homework as they conducted numerous forums, seeking community input. The public, especially the large numbers who are not able to drive, overwhelmingly support this project, and we want it now. We urge you to support the Bus Rapid Transit alternative.

**Response:** Comment noted. It states the commenter's preference for an LPA.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.



HAWAII HOTEL ASSOCIATION  
2320 KALANALUA AVENUE, #4044  
HONOLULU, HI 96815-2244  
TELEPHONE: (808) 822-0087  
FAX: (808) 824-3843  
E-MAIL: [info@hawaii-hotel.com](mailto:info@hawaii-hotel.com)  
WEBSITE: [www.hawaii-hotel.com](http://www.hawaii-hotel.com)

Testimony of Murray Towill  
President  
Hawaii Hotel Association

October 26, 2000

Re: Primary Corridor Transportation Project

Good evening Chairman Bainum and members of the City Council's Transportation Committee. I am Murray Towill, President of the Hawaii Hotel Association and I appreciate this opportunity to present comments on the Primary Corridor Transportation Project.

We have reviewed the Primary Corridor Transportation Project and generally agree with the direction and plans proposed for the BRT options. Clearly the status quo in traffic planning is not acceptable, and the city is to be applauded in its efforts to improve public transit as an alternative. We also understand that in any large scale proposal like this, the details present the greatest challenge.

Nevertheless, I would like to point out some issues that specifically pertain to Waikiki that we would like to see more fully evaluated and/or explained. First, a number of our members have questioned putting transit vehicles on Kalakaua Ave. The city has just spent millions of dollars improving Kuhio Beach, and this proposal would move city buses adjacent to these improvements. BRT service to Waikiki seems desirable, but other solutions such as a Kuhio Ave. and Ala Wai Blvd. loop might work.

Second, if the Kalakaua Ave. and Kuhio Ave. loop is to be used, we are concerned about the dedication of a vehicle lane on Kalakaua for transit vehicles only. Between Kālalani Ave. and Kapahulu Ave., Kalakaua Ave. was recently reduced to three moving lanes in conjunction with the Kuhio Beach improvements. The BRT proposal would remove another lane for non-transit vehicles. Director Soon has indicated this dedicated lane may not be necessary. We would ask the Council to emphasize this point if the BRT proposal is selected since we believe severe traffic congestion would result from the elimination of another lane.

Third, we would like to see a more detailed analysis and explanation of how businesses in Waikiki would obtain freight and goods service. The reduction of lanes and elimination of loading areas will certainly complicate operations of Waikiki businesses. The outcomes of this type of analysis must be integrated into any final Transportation Plan.

Finally, we would like to see a more detailed analysis of the BRT plan of Kuhio Ave. It appears that Kuhio would be reduced to four (4) moving lanes. One would be dedicated to the BRT, one would handle local buses, trucks and automobiles moving in a Diamondhead direction. Two lanes would accommodate local buses, trucks and automobiles moving in an Ewa direction. This configuration seems likely to create serious movement problems.

Again, thank you for the opportunity to provide comments.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
MAYOR

Mr. Murray Towill  
Page 2  
November 13, 2002

CERYL D. SOOH  
DIRECTOR  
GEORGE NEGOMI IYAYAMOTO  
DEPUTY DIRECTOR

TPD10/00-05268R

November 13, 2002

Mr. Murray Towill, President  
Hawaii Hotel Association  
2250 Kalakaua Avenue, #404-4  
Honolulu, Hawaii 96815

Dear Mr. Towill:

Subject: Primary Corridor Transportation Project

This responds to your oral testimony at the October 25, 2000 Special Transportation Committee Meeting and your October 26, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. We generally agree with the direction and the plans proposed in the BRT option.  
**Response:** Comment noted. It is a statement of opinion.
2. First of all, some of our members have questioned the logic of putting City buses on Kalakaua Avenue especially after the City has invested millions of dollars at the Kuhio Beach Improvements then to be putting City transit vehicles immediately adjacent to those improvements.  
**Response:** Proposed vehicles will be environmentally compatible electrically powered buses that will provide an option to the private auto. This is completely consistent with the City's objectives of reinforcing Waikiki and Kalakaua Avenue as a pedestrian-oriented precinct.
3. And they question whether perhaps a Kuhio/Ala Wai loop might be considered in lieu of a Kalakaua/Kuhio loop. As another way to create a couplet moving transit vehicles through Waikiki.  
**Response:** Prior to selection of Kalakaua and Kuhio Avenues as the Locally Preferred Alternative route in Waikiki, the City analyzed a variety of alternate routes including: (1) two-direction service on Kuhio; (2) a Kuhio-Ala Wai BRT couplet; (3) a Kalakaua-Ala Wai BRT couplet; and (4) turning back BRT service at or near Saratoga and Kalakaua. None of these alternatives would provide anywhere as convenient service to residents and employees in central Waikiki as the Refined LPA.
4. Secondly, the Kalakaua/Kuhio BRT loop dedicates traffic lanes to BRT vehicles. And that becomes especially critical on Kalakaua in the section between Kalaiahua and Kapahuu Avenue where recently a lane of traffic was removed for the Kuhio Beach Improvements. And now we're talking about dedicating another lane to transit vehicles, the BRT and other sort of transit vehicles. So, you would end up with all other vehicles and all sorts of truck traffic being limited to two lanes. Again, recognizing there will be additional loading requirements removed from the street.

Director Soon has indicated that it may not be necessary to dedicate a BRT lane in that particular four-block stretch. And that's something that we would certainly like to see to have the Council emphasize on that.

**Response:** A semi-exclusive BRT lane on Kalakaua Avenue will not be required Koko Head of the Kalakaua/Uluhiu Stop. Therefore no lane-use restrictions are proposed for any of the existing three lanes in the five-block segment between Uluhiu Street to Kapahuu Avenue. The makai curb lane Ewa of Uluhiu Street, including the one block segment between Kalaiahua Avenue and Uluhiu Street will be converted to a semi-exclusive transit lane for use by BRT buses, private buses and trolleys, and right-turning autos.

5. And, I guess, finally the reductions of lanes and elimination of loading options is clearly going to impact business operation in Waikiki. And the City has talked about a loading study. We would like to make sure that that's done in conjunction with the transportation or the transit planning to make sure that these are dovetailed into the final transit solutions.

**Response:** Through community outreach efforts including working with members of the Hawaii Transportation Association which represents private freight and passenger carriers, the sub area Working Groups, the Waikiki Improvement Association, and others, DTS has developed a plan which minimizes direct impacts on passenger and freight loading zones, and, in the event of unavoidable adverse impacts, identifies alternate loading locations for all businesses along the BRT route. There will not be any measurable impact on businesses due to the loss of any loading zones. This will be achieved by allowing freight carriers to continue to use the BRT shared lanes during legal delivery hours (10 P.M. to 9 A.M.) on Kalakaua Avenue and 10P.M. to 7:30 A.M. on Kuhio Avenue). During these hours the BRT would simply pass around a stopped loading truck by using the adjacent traffic lane.

6. First, a number of our members have questioned putting transit vehicles on Kalakaua Ave. The city has just spent millions of dollars improving Kuhio beach, and this proposal would move city buses adjacent to these improvements. BRT service to Waikiki seems desirable, but other solutions such as a Kuhio Ave. and Ala Wai Blvd. loop might work.

**Response:** The pedestrian experience along Kuhio Beach and other portions of the In-Town BRT alignment should improve because noise levels will be lower and air quality will be cleaner with the use of environmentally friendly, electric or hybrid-electric vehicles.

7. Second, if the Kalakaua Ave. and Kuhio Ave. loop is to be used, we are concerned about the dedication of a vehicle lane on Kalakaua for transit vehicles only. Between Kalaiahua Ave. and Kapahuu Ave., Kalakaua Ave. was recently reduced to three moving lanes in conjunction with the Kuhio Beach Improvements. The BRT proposed would remove another lane for non-transit vehicles. Director Soon has indicated this dedicated lane may not be necessary. We would ask the Council to emphasize this point if the BRT proposal is selected since we believe severe traffic congestion would result from the elimination of another lane.

**Response:** See response to comment #4.

8. Third, we would like to see a more detailed analysis and explanation of how businesses in Waikiki would obtain freight and goods service. The reduction of lanes and elimination of loading areas will certainly complicate operations of Waikiki businesses. The outcomes of this type of analysis must be integrated into any final Transportation Plan.





**HAWAII TEAMSTERS AND  
ALLIED WORKERS, LOCAL 996**

1817 Hart Street  
Honolulu, Hawaii 96819-3205

Telephone: (808) 847-6633  
Fax: (808) 842-4575

Mr. Murray Towill  
Page 3  
November 13, 2002

**Response:** See response to comment #5.

Moreover, according to the traffic analysis presented in the FEIS Table 4.2-8, the level of congestion on Kalanianaʻola Avenue will not be significantly different in 2025 with or without the BRT. Your buses will still be able to drop off and pick up passengers at designated loading zones.

9. Finally, we would like to see a more detailed analysis of the BRT plan of Kuhio Ave. It appears that Kuhio would be reduced to four (4) moving lanes. One would be dedicated to the BRT, one would handle local buses, trucks and automobiles moving in a Diamondhead direction. Two lanes would accommodate local buses, trucks and automobiles moving in an Ewa direction. This configuration seems likely to create serious movement problems.

**Response:** Since publication of the MIS/DEIS, the City has worked with the Waikiki Working Group and other interested parties in the Kuhio Avenue corridor to redesign the BRT in Waikiki to minimize impacts on vehicular traffic, and to maximize opportunities for widening sidewalks on Kuhio Avenue. Changes include providing for a minimum of a combined eight feet of sidewalk widening on one or both sides of Kuhio Avenue. Within the remaining roadways, the lane designation on Kuhio Avenue would be one 18-foot-wide mixed traffic lane in each direction, a shared BRT/bus and trolley lane adjacent to the mauka curb, and left- or right-turn pockets at key intersections. The impacts of this configuration on traffic conditions along Kuhio Avenue are shown in Table 4.3-13 of the FEIS.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in this project.

Sincerely,

CHERYL D. SOOIN  
Director

November 14, 2000:

Written Testimony of Robert Costa Sr., on behalf of the Hawaii Teamsters, and Allied Workers, Local 996, to the City Council Transportation Committee on the Primary Corridor Transportation Project.

Chair Bainum and Members of the City Council Transportation Committee, I would like to encourage the committee to consider the Transportation System Management alternative.

As a city bus driver for twenty five years, I have seen the traffic on the H-1 freeway, Dillingham Blvd. and King Street increase dramatically, and believe that any restriction of traffic on these streets would be a nightmare. The BRT alternative cuts the number of traffic lanes in half and will result in a traffic disaster.

As an example, the recent construction at King and Dillingham backed up traffic, sometimes to Kapalama canal on Dillingham.

The Transportation System Management alternative will use our present system more efficiently. As a bus driver, I see many areas where small changes could lead to big improvements in traffic flow.

In closing, as a city bus driver who drives these traffic corridors on a regular basis, I would be glad to make myself available for the committee to talk about traffic situations I encounter every day.

PETITION TO SUPPORT THE TRANSPORTATION SYSTEM MANAGEMENT ALTERNATIVE



ADDRESS	SIGNATURE	PRINT NAME
3207 Chinaman Pt	<i>[Signature]</i>	Josephine Matsui
1467 Ilika Ln.	<i>[Signature]</i>	Josephine Matsui
1180 Oka Moku St.	<i>[Signature]</i>	Josephine Matsui
1425 Kiana St #28	<i>[Signature]</i>	Josephine Matsui
95-1009 Kapaeha St #29	<i>[Signature]</i>	Josephine Matsui
91-203 Kuananani St.	<i>[Signature]</i>	Josephine Matsui
91-311 Kuananani St #11	<i>[Signature]</i>	Josephine Matsui
60129 Ohihi Pl. Waikele 9679	<i>[Signature]</i>	Josephine Matsui
94-715 Kahaione St.	<i>[Signature]</i>	Josephine Matsui
94-044 Nahaaka Pl. Oahu 9671	<i>[Signature]</i>	Josephine Matsui
95-225 Waikele Place III	<i>[Signature]</i>	Josephine Matsui
1707 Pali St. #207, Hahaione, HI	<i>[Signature]</i>	Josephine Matsui
90-111 Aiea Kai Way #101, Hahaione, HI	<i>[Signature]</i>	Josephine Matsui
1470 Alhambra Dr. Hahaione, HI	<i>[Signature]</i>	Josephine Matsui
1442 Lusitana #104 Hahaione, HI	<i>[Signature]</i>	Josephine Matsui
906 Hahaione St. Hahaione, HI	<i>[Signature]</i>	Josephine Matsui
94-906 Kahaione St. Waikele, HI	<i>[Signature]</i>	Josephine Matsui

DOCUMENTS SECTION  
CITY CLERK'S OFFICE

Petition No. 24

Submitted by the Hawaii Teamsters Local 996 for Special Transportation Committee meeting on 11/14/00 on Res. 00-249, Selection of a Locally Preferred Alternative for the Primary Corridor Transportation Project

609 signatures

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

630 SOUTH KING STREET, 2ND FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 533-4529 • Fax: (808) 533-1720 • Internet: www.cd.honolulu.hi.us



DEPUTY MAJOR  
MAJOR

CHERYL D. SOOHI  
DIRECTOR

GEORGE YEOKI MYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

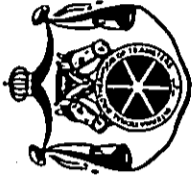
Mr. Robert Costa, Sr.  
Hawaii Teamsters and Allied Workers, Local 996  
1817 Hart Street  
Honolulu, Hawaii 96819

Dear Mr. Costa:

Subject: Primary Corridor Transportation Project

This responds to your oral testimony at the November 14, 2000 Special Transportation Committee Meeting, and your November 14, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. I would like to encourage the committee to consider the Transportation System Management alternative.  
Response: Comment noted. It states the commenter's preference for an LPA.
2. As a city bus driver for twenty five years, I have seen the traffic on the H-1 freeway, Dillingham Blvd. And King Street increase dramatically, and believe that any restriction of traffic on these streets would be a nightmare. The BRT alternative cuts the number of traffic lanes in half and will result in a traffic disaster.  
Response: It is not the conversion of lanes that will create the congestion. The congestion for motorists will be there with or without the BRT. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.
3. The Transportation System Management alternative will use our present system more efficiently. As a bus driver, I see many areas where small changes could lead to big improvements in traffic flow.  
Response: Comment noted. It states the commenter's preference for an LPA.
4. In closing, as a city bus driver who drives these traffic corridors on a regular basis, I would be glad to make myself available for the committee to talk about traffic situations I encounter every day.  
Response: Thank you for your comments and offer of assistance.



**HAWAII TEAMSTERS AND  
ALLIED WORKERS, LOCAL 996**  
AFFILIATED WITH THE INTERNATIONAL BROTHERHOOD OF TEAMSTERS

1817 Hart Street  
Honolulu, Hawaii 96819-3205

Telephone: (808) 847-6633  
Fax: (808) 842-4575

Mr. Robert Costa, Sr.  
Page 2  
November 13, 2002

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

November 6, 2000

Public Comment Regarding DEIS

Sincerely,

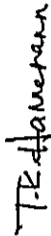
  
CHERYL D. SOON  
Director

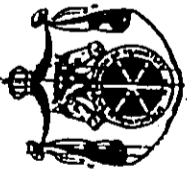
On October 26, 2000 testimony was held at the City Council Chamber to determine the alternative transit investments that could and will affect transportation, traffic congestion, and the environment in communities between Kapolei and the University of Hawaii.

The three options are the No-Build Alternative, the Transportation System Management Alternative (TSM), and the Bus Rapid Transit (BRT).

Teamster Local 996 President Mel Kahele and the Assistant to the President, Pat Kahele, gave testimony in defense of the TSM project citing the benefits of that alternative. Our current system costs taxpayers \$122 million annually (Thebus and paratransit). The BRT Alternative will cost \$181.7 million plus the \$122 million. What's going to happen if and when we need to add additional corridors to connect to the Downtown area from the Windward side? Do we now spend another \$181+ million toward the construction, maintenance, and the operations of another BRT system? How many more additions to the BRT will be needed to finally relieve the congestion if at all possible? And how many billions will it cost upon completion?

"Let's not put politics before reasonableness", stated President Kahele. "The hub and spoke can and will work, we need more parking for the riders... why not support a system that has already been proven?" President Kahele encourages everyone to please sign a petition to support this TSM System and to send it to the HTAW Local 996 office located at 1817 Hart Street, Honolulu, Hawaii 96819 or to the Department of Transportation Services at 711 Kapiolani Blvd., Ste. 1200, Honolulu, Hawaii 96813.

  
T. K. Hannemann  
Business Representative



**HAWAII TEAMSTERS AND ALLIED WORKERS, LOCAL 996**  
Aligned with the International Brotherhood of Teamsters

1817 Han Street  
 Honolulu, Hawaii 96819-3205  
 Telephone: (808) 847-6633  
 Fax: (808) 842-4575

November 13, 2000

Good Morning Chair Baimun, Transportation Committee,

My name is T.K. Hannemann, Business Representative from the Hawaii Teamsters, Local 996. I am here today to give testimony in regards to Resolution 00-249-Section of Locally Preferred Alternative for the Primary Corridor Transportation Project. The Union's position that this committee take a serious look at different alternatives to better suite our transportation problems in Honolulu. As a former bus driver with The Bus, I for one know of the increasing traffic and horrible conditions that residents of this city face everyday.

We cannot support a fully integrated mass transit system, instead we would rather see more study be put into the (TSM) Transportation System Management Alternative. We need to increase services into our brand new hub-n-spoke system, which was shoved down our throats just a few months ago. We need to nurture this project, provide more park-n-ride facilities, more routes and eventually more buses. We do not need to spend some 188 million in a BRT system that may look good, but cost too much. Let's be reasonable and equitable and concentrate our efforts toward the TSM.

Thank you for your time.

*T.K. Hannemann*  
 T.K. Hannemann  
 Business Representative  
 Hawaii Teamsters, Local 996

Copy to: Mel Kahele, President  
 Hawaii Teamsters Union, Local 996



**HAWAII TEAMSTERS AND APR 20 2002 ALLIED WORKERS, LOCAL 996**  
Aligned with the International Brotherhood of Teamsters

1817 Han Street  
 Honolulu, Hawaii 96819-3205  
 Telephone: (808) 847-6633  
 Fax: (808) 842-4575

April 20, 2002

Good afternoon distinguished guests of the Federal Transportation Administration:

My name is T. K. Hannemann, Business Representative of the Hawaii Teamsters and Allied Workers, Local 996. Thank you for making this trip across the pacific ocean to our beautiful "Aloha State".

I am here this afternoon to testify against the implementation of the Bus Rapid Transit. The City Administration, The Department of Transportation Services and The Honolulu City Council have bought into this project, they most certainly have painted a glorious picture, to you of the benefits it will provide the commuters of this island.

For nearly a year and a half these following questions have been posed through different public venues orchestrated by the DTS to nix any and all opposition to this project. My entrusted colleagues please listen to these questions and ask yourselves if the picture painted previously is real.

- (1) How will the BRT impact members of the Hawaii Teamsters Local 996? More specifically bus operators and Handi-Van drivers at Oahu Transit Services, currently totaling more than 1,000. This project will dedicate and take away specific traffic lanes along major thorough fares, such as Dillingham Blvd., Kapiolani Blvd., King Street, Ala Moana Blvd, Pensacola Street, Kalakaua and Kuliou Avenues.
- (2) How will the BRT impact Teamster Trucking Companies who depend on timely, delivery of goods and services, that cannot happen when traffic lanes will be designated solely for the BRT, leaving in some areas one lane in each direction for shared public use? All of these thoroughfares cannot be expanded, infrastructure, surrounding businesses, and communities have been in place for decades. What this project will do to our existing public transportation system is cause everyone else besides the BRT, to share the left over traffic lanes with private automobiles. TheBus, The Handi-Van and Trucking Companies. Traffic will be a total nightmare.
- (3) What will the impact be to surrounding neighborhoods along the in-town segment when traffic causes vehicles to travel on side streets to try and get to their destinations at a quicker pace?
- (4) With a price tag currently at \$1.069 billion, how much will the taxpayers have to pay?
- (5) With a project of this magnitude, have these three questions should be asked?

Do we need it?  
 Can we afford it?  
 Can we maintain it?

Thank you for your time.

*T.K. Hannemann*  
 T.K. Hannemann  
 Business Representative  
 HTAW Local 996

cc: Mel Kahele, President, HTAW Local 996

HAWAII TEAMSTERS and ALLIED WORKERS UNION, LOCAL 996  
COMPANIES THAT WILL BE AFFECTED BY THE  
IMPLEMENTATION OF THE "BRT".

ALOHA PETROLEUM, LTD.  
ANDERSON NEWS CORPORATION  
ARMOUR SWIFT - ECKRICH  
BETTER BRANDS, LTD.  
BOC GASSES/GASPRO  
C.W. CARTER, CO  
CITY MILL  
COYNE MATRESS, CO.  
EVERGREEN HILLSIDE DAIRY  
GOLDEN STATE FOODS CORP  
HAWAII TRANSFER COMPANY  
HONOLULU WOOD TREATING CO  
HONSADOR LUMBER CORP  
FOREMOST DAIRIES  
ISLAND COMMODITIES  
JOHNSON BROS. OF HAWAII, INC.  
MARTIN WAREHOUSING  
McKESSON DRUG CO.  
MEADOW GOLD DAIRIES, INC.  
MERCANTILE TRUCKING CO.  
MONFORT FOOD DISTRIBUTION COMPANY  
OAHU TRANSIT SERVICES  
OCEANIC CABLE INC.  
PARADISE BEVERAGES  
SUN VAN HAWAII  
THE GAS COMPANY  
TOSCO CORP  
UNICOLD CORPORATION  
UNITED PARCEL SERVICE  
YELLOW FREIGHT SYSTEMS

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

630 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 523-4329 • Fax: (808) 523-4700 • Internet: www.cc.honolulu.hi.us

JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE "KEONO" MEYALUOTO  
DEPUTY DIRECTOR

TPD1100-05412R

November 13, 2002

Mr. T. K. Hannemann, Business Representative  
Hawaii Teamsters and Allied Workers, Local 996  
1817 Hart Street  
Honolulu, Hawaii 96819

Dear Mr. Hannemann:

Subject: Primary Corridor Transportation Project

This is in response to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplement Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your oral testimony at the November 6, 2000 Special Transportation Committee Meeting, your November 13, 2000 letter, and your November 14, 2000 submission regarding the MIS/DEIS. Part B responds to your oral testimony at the April 20, 2002 public hearing regarding the SDEIS.

Part A - MIS/DEIS Comments

1. Teamster Local 996 President Mel Kahele and the Assistant to the President, Pat Kahele, gave testimony in defense of the TSM project citing the benefits of that alternative.  
**Response:** Comment noted. It states the commenter's preference for an LPA.
2. Our current system costs taxpayers \$122 million annually (TheBus and paratransit). The BRT Alternative will cost \$181.7 million plus the \$122 million. What's going to happen if and when we need to add additional corridors to connect to the Downtown area from the Windward Side? Do we now spend another \$181+ million toward the construction, maintenance, and the operations of another BRT system? How many more additions to the BRT will be needed to finally relieve the congestion if at all possible? And how many billions will it cost upon completion?  
**Response:** The \$181.7 million in O&M cost shown in the MIS/DEIS was for the In-Town BRT as well as the entire bus and TheHandi-Van systems (in FY 2010 year of expenditure dollars). The No-Build Alternative O&M cost was shown to be \$163.6 million in FY 2010. The difference for a vastly superior system (BRT Alternative) would be \$18.1 million, not \$122 million. Also, the Refined LPA (BRT Alternative) includes improvements not only in the Primary Corridor but island-wide. The projected O&M costs in the FEIS are comparable to those in the MIS/DEIS.
3. The Union's position that this committee take a serious look at different alternatives to better suit our transportation problems in Honolulu. As a former bus driver with TheBus, I for one know of the increasing traffic and horrible conditions that residents of this city face everyday.

Response: Chapter two of the FEIS provides a description of the various alternatives that were initially considered including: The No-Build Alternative, Transportation System Management (TSM) Alternative, the Bus Rapid Transit (BRT) Alternative, the Light Rail Transit (LRT) Alternative, and the Sand Island Scenic Parkway (SISP). This initial list of alternatives resulted from Rounds 1 and 2 of the Oahu Transit 2K meetings, public agency input and technical analysis.

A Fully Grade-Separated Transit Alternative, and a Highway Alternative to Transit were eliminated early in these rounds by the public because they were deemed not responsive to the project's purpose and need, and were cost prohibitive. The No-Build, TSM, and BRT Alternatives are analyzed in the MIS/DEIS. The BRT Alternative emerged as the Locally Preferred Alternative due to its superior performance for most criteria. Other alternatives were considered but eliminated due to failure to satisfy purpose and need requirements and/or due to other concerns such as public opposition, significant environmental impacts and financial feasibility.

4. We cannot support a fully integrated mass transit system, instead we would rather see more study be put into the (TSM) Transportation System Management Alternative. We need to increase services into our brand new hub-and-spoke system, which was shored down our throats just a few months ago. We need to nurture this project, provide more park-and-ride facilities, more routes and eventually more buses. We do not need to spend some 188 million in a BRT system that may look good, but cost too much. Let's be reasonable and equitable and concentrate our efforts toward the TSM.

Response: Comment noted. It states the commenter's preference for the LPA.

Part B - SOES Comments

5. How will the BRT impact members of the Hawaii Teamsters Local 996? More specifically bus operators and Handi-Van drivers at Oahu Transit Services, currently totaling more than 1,000. Dillingham Blvd., Kapiolani Blvd., King Street, Ala Moana Blvd, Pensacola Street, Kalakaua and Kuhio Avenues.

Response: There will be a 27 percent increase in the number of bus drivers needed with the Refined LPA compared to the No-Build Alternative. By 2025 there will be a 63 percent increase in the number of bus drivers compared to today.

6. How will the BRT impact Teamster Trucking Companies who depend on timely delivery of goods and services, that cannot happen when traffic lanes will be designated solely for the BRT, leaving in some areas one lane in each direction for shared public use? All of these thoroughfares cannot be expanded, infrastructure, surrounding businesses, and communities have been in place for decades. What this project will do to our existing public transportation system is cause everyone else besides the BRT, to share the left over traffic lanes with private automobiles, TheBus, TheHandi-Van and Trucking Companies. Traffic will be a total nightmare.

Response: As pointed out in Chapter 4 of the FEIS, it is not the conversion of lanes that will create congestion. The congestion for motorists (including truck drivers) will be there without the BRT. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

7. What will the impact be to surrounding neighborhoods along the In-Town segment when traffic causes vehicles to travel on side streets to try and get to their destinations at a quicker pace?

Response: As traffic grows in the future, the pressure for vehicles to utilize side streets will probably increase. This is true whether BRT is implemented or not. The Refined LPA (BRT) provides a transit alternative that will help to relieve some of this pressure. The Refined LPA evaluated in the FEIS is modified from the concept described in the DEIS to include more semi-exclusive and mixed flow segments. Some of these changes were in response to impacts to traffic operations. In other segments, exclusive BRT lanes have been retained since they are crucial for the BRT to operate effectively. In these locations, the City has and will continue to work with the community to minimize the use of side streets by through vehicles.

8. With a price tag currently at \$1.069 billion, how much will the taxpayers have to pay?

Response: \$359.2 million in City General Obligation Bond proceeds will be needed for the project, which includes the entire bus system.

9. With a project of this magnitude, have these three questions should be asked?

Do we need it?  
Can we afford it?  
Can we maintain it?

Response: As documented in the FEIS the answer is yes to all three questions.

10. I was under the impression that, like the gentleman that spoke before me, that I would have the audience of somebody from the Federal Transit Administration here. Thus my testimony is formulated, I guess, to the stenographer, but the FTA will get this testimony.

Response: The FTA did receive a copy of the April 20, 2002 public hearing transcript and has reviewed all the MIS/DEIS and SDEIS comments and responses.

11. Good afternoon, distinguished guests of the FTA. My name is T. K. Hannemann, Business Representative of the Hawaii Teamsters and Allied Workers, Local 996. Thank you for making this trip across the Pacific Ocean to our beautiful Aloha State.

Response: No response required.

12. I'm here this afternoon to testify against the implementation of the BRT. The City Administration, the Department of Transportation Services, and the Honolulu City Council have bought into this project. They most certainly have painted a glorious picture to you of the benefits it will provide the commuters of this island.

Response: Comment noted.

13. For nearly a year and a half, these following questions have been posed through different public venues orchestrated by the DTS to stir up any and all opposition to this project. My entrusted colleagues, please listen to these questions and ask yourselves if the picture painted previously is real.

Mr. T. K. Hannemann  
Page 4  
November 13, 2002

**Response:** It is unrealistic to think that the City is capable of nbdng any and all opposition to the project.

**14. How will the BRT impact members of the Hawaii Teamsters Local 996? More specifically, but operators and the Handi-Van drivers at Oahu Transit Services, currently totaling more than a thousand. This project will dedicate and take away specific traffic lanes along major thoroughfares, such as Dillingham Boulevard, Kapolei Boulevard, King Street, Ala Moana Boulevard, Pensacola, Kalakaua and Kuhio Avenues.**

**Response:** See response to comment #5.

**15. How will the BRT impact Teamster trucking companies who depend on timely delivery of goods and services, that cannot happen when traffic lanes will be designated solely for the BRT, leaving in some areas one lane in each direction for shared public use?**

**Response:** See response to comment #6.

**16. All of these thoroughfares cannot be expanded. Infrastructure, surrounding businesses and communities have been in place for decades. What this project will do to our existing public transportation system is cause everyone else, besides the BRT, to share the leftover traffic lanes. Traffic will be a total nightmare.**

**Response:** See response to comment #6.

**17. What will the impact be to surrounding neighborhoods along the in-town segment when traffic causes vehicles to by and get on side streets to get to their destinations at a quick pace?**

**Response:** See response to comment #7.

**18. With the price tag currently at over a billion dollars, how much will the taxpayers have to pay? Anytime there's a project of this magnitude with the price tag over a billion dollars, three essential questions should be answered. These questions are, as I've posed previously for over a year: One, do we need it? Two, can we afford it? Most importantly, three, can we maintain it?**

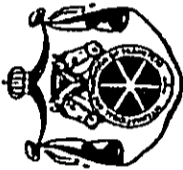
**Response:** \$359.2 million in City General Obligation Bond proceeds will be needed for the project, including bus acquisitions and other improvements for the entire system. Yes, more passenger capacity and more efficient and timely service is needed - which can be most cost effectively carried out with BRT. Second, yes, the financial plan shows that BRT can be paid for and is within the financial capacity of the City. Thirdly, the plan accommodates the maintenance of the system, including the use of federal grant funds for Preventive Maintenance.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director



## HAWAII TEAMSTERS AND ALLIED WORKERS, LOCAL 996

1817 Han Street  
Honolulu, Hawaii 96819-3205

Telephone: (808) 587-5811  
Fax: (808) 542-4513

November 13, 2000

Written Testimony of Mel Kahele, on behalf of the Hawaii Teamsters and Allied Workers, Local 996, to the City Council Transportation Committee on the Primary Corridor Transportation Project

Chair Baintum and Members of the City Council Transportation Committee,

I would like to once again encourage the Committee to consider the Transportation System Management (TSM) alternative. Having previously testified on the cost factor issue, I would now like to elaborate on the practicalities of the various options. Having members in various industries whose jobs it is to travel our roadways on a daily basis, whether as bus drivers, truck drivers, and people who are simply in route to and from work, it appears prudent that the TSM is the most realistic and balanced alternative. It focuses on enhancing the system to better address the needs of those who choose to or do not have any choice but to use public transportation. It is undeniable that there is also a segment of the public who use their personal automobile to conduct business, as well as those of the public who, despite how attractive public transportation is made to be, will continue to make their personal choice to drive their automobiles. The BRT alternative operates under the premise that if you build it, they will come. However, if the BRT alternative negatively impacts upon not only automobile drivers but those who are on the roadways as part of their job, and if it turns out that the costly BRT is underutilized, then it will be a lose-lose situation. We encourage the improvement of the existing transit system through the TSM alternative, and thank this Committee for its consideration.

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 522-4229 • Fax: (808) 522-4730 • Internet: www.co.honolulu.hi.us



JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE KEOKU MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

Mr. Mel Kahale  
Hawaii Teamsters and Allied Workers, Local 898  
1817 Hart Street  
Honolulu, Hawaii 96819

Dear Mr. Kahale:

Subject: Primary Corridor Transportation Project

This is in response to your October 28 and November 13, 2000 letters regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. *I believe with the system that we presently got in effect, the hub and spoke, we need to tweak it up a little bit. We have already put the hub and spoke in effect and... I believe it's running beautifully.*

**Response:** DTS continually reevaluates the level of service provided by the existing bus system and has begun to reconfigure the existing radial network of bus routes to a hub-and-spoke configuration. An integral part of the Refined LPA is a hub-and-spoke bus network that would connect with Regional and In-Town BRT systems, providing the hub-and-spoke network with a fast, high-capacity transit service corridor.

2. *The problem is, by some of the people that have rode the bus and that are intending on riding the bus, is that there's no parking. There's no parking for the people that's out there in Kepoel, in other areas that are willing to ride the bus into town and catch the spokes. But there's no dem area where they can park their vehicles. They either have to walk down to where the hub is at, or again, get dropped off. So, again, that's an area that needs to be fixed.*

**Response:** Additional park-and-ride facilities are being planned at various locations throughout Oahu, some of which will be provided as part of the Refined LPA.

3. *I believe the present service is workable, is double and the money that we've spent, the taxpayers, I believe we shouldn't waste it. We should try to keep the present system in effect. The BRT is a big fantasy. And I'm not only speaking on behalf of Mel Kahale, I'm also speaking on behalf of a lot of the bus drivers because they are presently the people that's transporting the passengers to and from Point A to Point B and across the city of Honolulu.*

**Response:** As shown in the FEIS analyses, the present system (No-Build Alternative) would not meet future travel needs and would result in greater environmental impacts than the Refined LPA for most factors. The Refined LPA is also shown to be the most cost-effective when compared to the No-Build and TSM Alternatives.

4. *And, I don't believe the BRT plan has been thoroughly thought out and the impact that it's going to have to the city of Honolulu. Again, let's not put politics before reasonableness and, I believe, City Council will do the right thing on November 29.*

Mr. Mel Kahale  
Page 2  
November 13, 2002

**Response:** Project planning has been ongoing for many years and potential impacts have been studied in detail. The project began with public outreach in 1988, the MIS/DEIS was issued in August 2000, and the Locally Preferred Alternative (LPA) was selected by the City Council in November 2000. The selection of the Refined LPA is the result of extensive public involvement.

*I would like to once again encourage the Committee to consider the Transportation System Management (TSM) alternative.*

**Response:** Comment noted. It states the commenter's preference for a LPA.

6. *Having previously testified on the cost factor issue, I would now like to elaborate on the practicalities of the various options. Having members in various industries whose jobs it is to travel our roadways on a daily basis, whether as bus drivers, truck drivers, and people who are simply in route to and from work, it appears prudent that the TSM is the most realistic and balanced alternative. It focuses on enhancing the system to better address the needs of those who choose to or do not have any choice but to use public transportation.*

**Response:** Comment noted. It states the commenter's preference for a LPA.

7. *It is undeniable that there is also a segment of the public who use their personal automobile to conduct business, as well as those of the public who, despite how attractive public transportation is made to be, will continue to make the personal choice to drive their automobiles. The BRT alternative operates under the premise that if you build it, they will come. However, if the BRT alternative negatively impacts upon not only automobile drivers but those who are on the roadways as part of their job, and if it turns out that the costly BRT is underutilized, then it will be a lose-lose situation.*

**Response:** As shown in the FEIS analysis, the present system (No-Build Alternative) would not meet future travel needs and would result in greater environmental impacts than the Refined LPA for most factors. The Refined LPA is also shown to be more cost-effective when compared to the TSM Alternative. The purpose of the Refined LPA is to provide an attractive, affordable, dependable transportation option to the private automobile. The Refined LPA increases the people carrying capacity throughout the primary corridor, reduces congestion, and preserves and improves the quality of life of Oahu's residents by improving transportation linkages within the primary corridor and between Kapolei and the urban core.

8. *We encourage the improvement of the existing transit system through the TSM alternative, and thank this Committee for its consideration.*

**Response:** Comment noted. It states the commenter's preference for a LPA.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director



DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE MEDO • MIYAMOTO  
DEPUTY DIRECTOR

Mr. Pat Kahele  
Page 2  
November 13, 2002

**Response:** Conversion to a hub-and-spoke service pattern has already begun and would have continued to be implemented regardless of which Alternative was selected. It will be most effective however with the Refined LPA.

4. *Anyway, my opinion is for the TSM. Keeping the system the way it is. Not for the BRT.*

**Response:** Comment noted. It is stating a preference for the LPA.

5. *But at the same time, you're advocating setting up a corridor of 11.2 miles at a cost of \$181.7 million and that's current cost or is it \$98 fm not too sure. But, how much is it going to be five years from now when we actually might even consider the system. Is it gonna be like the old system. Start at \$1.2, end it at \$3.4 billion.*

**Response:** The In-Town BRT capital cost estimate for a 12.8 mile system is \$225 million in 2002 dollars exclusive of EPT, and \$323 million when EPT costs are included.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

November 13, 2002

Mr. Pat Kahele  
Hawaii Teamsters and Allied Workers, Local 986  
1817 Hart Street  
Honolulu, Hawaii 96819

Dear Mr. Kahele:

**Subject:** Primary Corridor Transportation Project

This is in response to your testimony at the October 26, 2000 Special Transportation Committee Meeting regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. *In regard to the BRT, it is. I agree with the Outdoor Circle, and a few other speakers that did come up here that it is an untested system.*

**Response:** Technologies proposed for the In-Town BRT include an embedded plate technology (EPT) which consists of electric vehicles powered by a wayside traction power delivery system or hybrid electric propulsion system where energy for the traction power is carried on-board the vehicle. EPT vehicles would emit zero emissions. Hybrid electric vehicles would be low-emission vehicles because their diesel engines would always be operating at efficient levels.

Both candidate technologies are expected to be service proven by the time a decision on technology is to be made in 2008. Hybrid electric buses are already in revenue service in a number of cities, and EPT is in revenue testing in Trieste, Italy. Hybrid vehicles will be used for the initial operations and EPT installed in 2010.

2. *It's going to be costing, with the BRT, \$181.7 million. The current system cost \$122 million. That's going to be added to the current \$122 million. So what's going to happen in the future? Are we looking at another system for not just this corridor, but what about the Windward Corridor? I mean, we have all these different areas that are expanding, that the population is building up. We have Kaneohe. We have Kailua. We have Waimanalo. I mean, we have all these different areas that traffic is building up and it's not decreasing. It's getting worse.*

**Response:** The Operating and Maintenance Costs shown in the FEIS for all three Alternatives are for the entire island-wide transit system not just the Primary Transportation Corridor.

3. *But, this system, this hub and spoke, it was put here and it seems to be a good system. So far, there's some complaints sure. It's still an untested system. As of yet, more people are riding it. Surely you have complaints. Like you do with every system out there. Give this system a chance. Let this system prove itself. And maybe from there, expand the hub and spoke system. We're looking at eleven for the BRT. I mean what's... We're looking at spending all these millions of dollars to expand the system that is already and currently can be expandable.*

**FAX TRANSMISSION**  
HAWAII'S THOUSAND FRIENDS  
305 HAHANU STREET, PMB 282  
KAILUA, HAWAII 96734  
ph/fax 808-262-0682

To: Cheryl Soon, Director      Date: 11/6/00  
DTS  
From: Donna Wong      Page: 2  
Subject: Primary Corridor Transportation Project  
Major Investment Study/Draft Environmental Impact Statement

**COMMENTS:**

**MAHALOI**



Ke aloha o ko kākou 'āina, 'Oia ka mana kū pa'a. Pāhoanoa ka 'āina, Mānoanoa ka po'e.  
*The Love of our land, is the power for us to stand fast. Rare is the land, many is the people.*

November 2, 2000

Ms. Cheryl Soon, Director  
Department of Transportation services  
711 Kapi'olani Blvd., Ste. 1200  
Honolulu, Hawaii 96813.

RE: Primary Corridor Transportation Project Major Investment Study and  
Draft Environmental Impact Statement

Hawaii's Thousand Friends has the following concerns and questions.

- What is the rationale behind the adoption of a transportation plan before the Primary Urban Center Development Plan is adopted and development/growth patterns known? It is premature to base conclusions on a draft plan.
- It is premature to encourage "development" near transit centers before the Development Plan that directs and coordinates transit and growth has been adopted and the need for and locations of transit centers identified. This call before the horse approach invites urban sprawl.
- The DEIS is incomplete because both a botanical and cultural survey were not conducted. These surveys must be completed and submitted for public review before the FEIS is accepted.
- Since the proposed BRT could potentially impact existing traffic patterns a comprehensive traffic congestion study must be conducted and submitted for public review before the FEIS is accepted.
- The DEIS gave no reference to coordination between this plan, the Integrated Resource Plan for Water and the Development Plan. How are these three plans being used to provide a comprehensive road map for growth?
- Impacts from the widening of Ward Avenue and reduction of two lanes (dedicated to In-Town BRT) on Kapi'olani Boulevard and Kuhio Avenue are missing from the DEIS. Since these streets are major traffic corridors and



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TERESA HARRIS  
MAYOR



CHEM L. SOON  
DIRECTOR

GEORGE KEOKI MIYAMOTO  
SENIOR DIRECTOR

November 13, 2002

TPD11/00-05416R

Ms. Donna Wong  
Hawaii's Thousand Friends  
305 Hahani Street, PMB 282  
Kailua, Hawaii 96734

Dear Ms. Wong:

Subject: Primary Corridor Transportation Project

This is in response to your November 2, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. What is the rationale (sic) behind the adoption of a transportation plan before the Primary Urban Center Development Plan is adopted and development/growth patterns known? It is premature to base conclusions on a draft plan.

**Response:** There is no indication of when the updated Primary Urban Center Development Plan (PUC DP) will be adopted by the City Council. The environmental review process of the Primary Corridor Transportation Project (PCTP) cannot be delayed pending this outcome. The In-Town BRT has been designed to support current land uses and future land use patterns, particularly in vacant and underutilized parcels in Kakaako, Iwilei, and near Ala Moana Center and the Convention Center. These are the locations where development is likely to occur with or without the PCTP. Because of this, the Refined LPA has been evaluated in the FEIS as being consistent with the Public Review Draft of the PUC DP (May 2002), as well as the current PUC DP adopted in 1990.

2. It is premature to encourage "development" near transit centers before the Development Plan that directs and coordinates (sic) transit and growth has been adopted and the need for and locations of transit centers identified. This cart before the horse approach invites urban sprawl.

**Response:** See response to comment #1.

3. The MIS/DEIS is incomplete because both a botanical and cultural survey were not conducted. These surveys must be completed and submitted for public review before the FEIS is accepted.

**Response:** A panel of cultural experts was convened to identify and address cultural issues. A cultural report was prepared for the Final EIS. A comprehensive botanical survey was not conducted because the proposed BRT alignment will travel on existing roads and/or through highly urbanized areas. Instead, a detailed tree survey was conducted to assess potential impacts to urban street trees, and a report of impacts has been prepared. The results of both the cultural assessment and the tree survey are included in the FEIS. Public review of these new surveys will not be possible before the FEIS is accepted.

public land from Thomas Park may be needed for lane expansion, details and drawings showing changes and impacts must be completed and submitted for public review before the FEIS is accepted.

Since substations will be "required" every 1/2 mile the exact location, visual impacts and aesthetics of the substations must be identified and submitted for public review before the FEIS is accepted.

Will land need to be condemned to build the substations? If so what is the cost analysis for land purchase?

The move toward fixed rail is a major public policy shift and a major investment of public money. Therefore, we must venture into this undertaking carefully and fully informed.

The DEIS and Plan are inadequate and do not provide enough information on which to base a sound planning decision.

4. Since the proposed BRT could potentially impact existing traffic patterns, a comprehensive traffic congestion study must be conducted and submitted for public review before the FEIS is accepted.

**Response:** Chapter 4 of the FEIS documents a comprehensive traffic analysis which has been prepared based on public comments on the MIS/DEIS, refinements in the BRT alignment and the latest population and employment forecasts from DBEDT.

5. The DEIS gave no reference to coordination between this plan, the Integrated Resource Plan for Water and the Development Plan. How are these three plans being used to provide a comprehensive road map for growth?

**Response:** The PUC DP and the IRP for Water are consistent City and County plans. The FEIS is consistent with the DP, and therefore also with the IRP for Water.

6. Impacts from the widening of Ward Avenue and the reduction of two lanes (dedicated to In-Town BRT) on Kapiolani Boulevard and Kuhio Avenue are missing from the DEIS. These streets are major traffic corridors and public land from Thomas Park may be needed for lane expansion, details and drawings showing changes and impacts must be completed and submitted for public review before the FEIS is accepted.

**Response:** The traffic analysis in the FEIS includes impacts to Ward Avenue, Kapiolani Boulevard, and Kuhio Avenue.

The In-Town BRT alignment as described in the MIS/DEIS has been revised. The changes in alignment were addressed in the Supplemental DEIS that was circulated in Spring 2002. In the Refined LPA, the BRT will continue on King Street and turn makai on Pensacola Street. This will not affect Thomas Square since the revised alignment does not require the widening of Ward Avenue or King Street outside of the existing right-of-way.

7. Since substations will be "required" every 1/2 mile the exact location, visual impacts and aesthetics of the substations must [be] identified and submitted for public review before the FEIS is accepted.

**Response:** The visual impacts of the traction power supply stations (TPSS) are discussed in Section 5.4 of the FEIS. The substations will only be required if embedded plate technology (EPT) is used.

8. Will land need to be condemned to build the substations? If so what is the cost (sic) analysis for land purchase?

**Response:** If EPT is used, additional right-of-way will be needed for some of the TPSS. The estimated cost of the Refined LPA as shown in the FEIS does not include costs for land acquisition as specific sites for the TPSS have not been finalized. A detailed land acquisition cost analysis will be done at the time a decision needs to be made on whether to proceed with EPT in 2008.

9. The move toward fixed rail is a major public policy shift and a major investment of public money. Therefore, we must venture into this undertaking carefully and fully informed.

**Response:** Comment noted. While the Refined LPA is a Bus Rapid Transit not a rail system, DTS agrees with the intent of this statement.

10. The DEIS and Plan are inadequate and do not provide enough information on which to base a sound planning decision.

**Response:** The MIS/DEIS and conceptual drawings were prepared at the level required to select an LPA. The FEIS includes additional documentation and refinements, and addresses comments received on the MIS/DEIS.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director



October 5, 2000

TESTIMONY BEFORE THE CITY AND COUNTY OF HONOLULU'S  
COUNCIL COMMITTEE ON TRANSPORTATION  
ON THE PRIMARY CORRIDOR TRANSPORTATION PROJECT

Thank you Chairman Bainum and committee members. I am Gareth Sakakida, Managing Director of the Hawaii Transportation Association with 360 members involved in the commercial ground transportation industry (motor carriers).

HTA's primary concern with the Transportation System Management and the Bus Rapid Transit concepts is the loss of loading zones anywhere along the project's line, and especially in the Waikiki and Downtown areas.

Loss of loading zone space affects the ability of the motor carriers to feed the needs of the businesses, patrons, and employees of the Waikiki and Downtown area reliably and continuously. The current inventory of loading zones is already inadequate in both areas.

Downtown loading zones are consistently filled with private automobiles forcing trucks to double park in order to make deliveries. Whenever a loading zone can be found, a driver tries to make so many deliveries from that one zone, because he won't find another, that others must continuously circle the area waiting for something to open up.

Although Waikiki's mix of needs is very similar, the sheer volume makes the situation much worse than Downtown. Exacerbating this is the need for both passenger and freight loading zones.

Plans for the transit system to utilize the Kalakaua Avenue curbside lane is a tremendous concern if the lane is to be an exclusive use lane. The mauka and makai curbside lanes of Kalakaua serve as THE major loading zone area to service all street front customers since the majority of properties failed to provide adequate, or any, off street loading facilities.

Tour buses especially must use the makai curb or risk injury to passengers if they must unload them into traffic while parked on the mauka curb.

The City's DTS long ago acknowledged the problem with a short inventory of loading zone space and conceived the plan to allow the use of long stretches of Kalakaua and Kuhio Avenue curb sides to augment loading and unloading capacity.

P.O. Box 30166 • Honolulu, HI 96820 • Ph. (808) 833-6628 • Fax (808) 833-6486 • E-Mail: hta@hawaii.net

Motor carriers are very conscientious about serving their customers in a timely fashion. They do not have time to be driving in circles waiting for a loading zone to open up. Besides, there are so many others who also need the space that the probability of getting one is not good.

So when the paucity of legal loading zones prevent them from servicing their customers, they will do whatever they can to accomplish the service. In short, this means double parking, parking on sidewalks, etc., taking a chance that they won't get caught. It becomes easier to pay a fine than to have the customer perceive you cannot provide the necessary service.

In conclusion, HTA does not oppose improvements to Oahu's transit system. However, we are concerned about the loss of an already scarce asset - the loading zone. It does not make too much sense to expedite people movement if trucks and buses must park wherever they can, just for a minute, to get their job done and in the process inhibit traffic.

Thank you.



Ms. Cheryl D. Soon  
November 6, 2000  
Page 2

November 6, 2000

Ms. Cheryl D. Soon  
Director  
City and County of Honolulu  
Department of Transportation Services  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813

Dear Ms. Soon:

This response to the Primary Corridor Transportation Project MIS/Draft EIS focuses on Waikiki, which is a primary place of business for the members of the Hawaii Transportation Association (HTA) Passenger Carrier Conference. Every major private passenger carrier firm serving the visitor industry is a member of this Conference.

The HTA Passenger Carrier Conference supports the Bus Rapid Transit (BRT) alternative, provided that it does not include the proposed Waikiki segment. The reasons for this recommendation are discussed below.

The primary concern of HTA's Passenger Carrier Conference with the MIS/Draft EIS for the Primary Corridor Transportation Project is that it does not address the negative impact the BRT will have on those visiting Waikiki and on the private passenger carriers which serve them. The MIS/Draft EIS document does not adequately demonstrate an understanding of how the visitor industry operates in general nor how the passenger carriers that serve that industry operate in particular.

Federal law is very clear that in planning new transportation programs to be financed from federal funds, consideration must be given to preserving and utilizing existing transportation facilities, both public and private. Furthermore, in planning such new systems, federal law requires that the overall social, economic, energy and environmental impacts be considered. These federal objectives have not been sufficiently achieved in the MIS/Draft EIS.

The MIS/Draft EIS does not address the impact of any of the three alternatives it puts forth on privately owned and operated passenger carriers. It does not discuss whether pursuing the no-build, the TSM or the BRT alternatives will reduce the revenues of any of these businesses. There is no discussion of whether City and State tax revenues derived from passenger carriers will be reduced as a result of the impact of pursuing any of the three alternatives.

The crucial element in the private enterprise passenger carrier industry is service. Central to service is the convenience of the customer who is visiting Hawaii. It means:

- being able to pick-up and drop-off visitors and their baggage at their hotel.
- making multiple stops for the convenience of their customers.
- delaying departure for a moment when a customer who has already paid for his transportation is a little bit late arriving for boarding.
- ensuring that customers are not mystified and confused in a new place, with hard-to-pronounce street names, in ascertaining where they are to get on or off of their bus or trolley.
- recognizing that visitors may travel by tour bus, trolley, taxi, limousine or rental car.

The key element of the service issue is loading zones. Loss of loading zone space affects the ability of the passenger carriers to meet the needs of hotels and visitors of Waikiki reliably and continuously. The current inventory of loading zones is already inadequate along Kalakaua and Kuhio Avenues.

Plans for the transit system to utilize the Kalakaua Avenue curbside lane is a tremendous concern if the lane is to be a semi-exclusive use lane. The makai curbside lane of Kalakaua serves as THE major loading zone area to service all street front customers since the majority of properties failed to provide adequate, or any, off street loading facilities.

Private tour buses and trolleys must use the makai curb on Kalakaua for loading and unloading their passengers or risk injury to them if they are unloaded into traffic while the tour bus or trolley is parked along the mauka curb. Furthermore, the nature of the business makes it difficult to load and unload paying customers in a short period of time.

The City's DTS long ago acknowledged the problem with a short inventory of loading zone space and conceived the plan to allow the use of long stretches of Kalakaua and Kuhio Avenue curb sides to augment loading and unloading capacity.

The lack of adequate loading zones makes it difficult or impossible for private passenger carriers to serve visitors and serve them well. This may lead travel wholesalers to recommend other destinations to their clients. The consequence of a reputation for inadequate service is likely to be fewer visitors. The passenger carriers will obviously suffer if this were to happen, but so would the hotels and the visitor industry and in turn all of Hawaii including government.

Ms. Cheryl D. Soon  
November 6, 2000  
Page 3

Therefore, it does not make sense to expedite people movement if buses must park wherever they can, just for a minute, to get their job done and in the process inhibit traffic.

We also believe that the needs of our visitors to move between Waikiki and the convention center and shopping areas are adequately served by the present system. Private passenger carriers provide flexibility when it comes to capacity and routes. Depending on demand, various sized and types of vehicles can be utilized to accommodate anticipated passenger loads.

Contrary to Federal policy, the BRT in Waikiki would be competing and thereby taking away business from private passenger carriers that provide the same service. Consequently, this will have an adverse effect on the survivability of the private carriers.

The City states that its bus lines exist to serve residents, especially employees of the visitor industry, and not compete directly with private passenger carriage, but its behavior says otherwise. There are many examples of this, some of which are noted below:

- The City provides a \$10, four-day pass, which exists for and is marketed to short-term visitors;
- The City's OTS facilitates the promotion of its services through schedules published by private firms in the Japanese language and distributed in Japan for which OTS receives a royalty;
- The City monopolizes pick-up and delivery service to specific visitor destinations, e.g., Hanatama Bay;
- The City highly subsidizes travel of visitors on its buses.

It has been stated several times by the City that one of the main reasons for the BRT's Waikiki branch is to expedite the movement of employees into and out of Waikiki. We believe that the City does not have to build a BRT entering Waikiki to accomplish this. Peak ridership for Waikiki employees occurs in the morning, when they are going to work, and in the afternoon, when they leave to return home. A shuttle bus system running between Ala Moana Center and Waikiki, operated by the City or a private carrier, primarily during times of shift changes, can alleviate this problem by augmenting the current bus system. This shuttle bus system would also provide an additional benefit by freeing up much needed capacity on existing City buses for Waikiki residents.

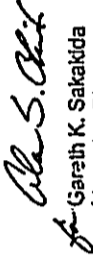
Ms. Cheryl D. Soon  
November 6, 2000  
Page 4

In conclusion, HTA does not oppose improvements to Oahu's transit system. We firmly believe, however, that it is not necessary to include a Waikiki branch in the BRT alternative. If, nonetheless, a decision is made to enter Waikiki, then HTA recommends that the City: (1) enter into a dialogue with the members of the HTA Passenger Carrier Conference and others exploring the possibility of using Kuhio Avenue or Kuhio Avenue and Ala Wai Boulevard for its BRT vehicles; and (2) keep those BRT vehicles off of Kalakaua Avenue.

If you have any questions, please call me at 833-6628.

Thank you for your time and attention to this matter.

Sincerely,

  
Garath K. Sakakida  
Managing Director

cc: Office of Environmental Quality Control



November 14, 2000

**TESTIMONY BEFORE THE CITY AND COUNTY OF HONOLULU'S  
COUNCIL COMMITTEE ON TRANSPORTATION  
ON RESOLUTION 00-249 - SELECTION OF A LOCALLY PREFERRED  
ALTERNATIVE FOR THE PRIMARY CORRIDOR TRANSPORTATION PROJECT**

Thank you Chairman Bainum and committee members. I am Gareth Sakakida, Managing Director of the Hawaii Transportation Association (HTA) with 360 members involved in the commercial ground transportation industry (motor carriers).

HTA supports improvements to Oahu's transit system, and of the three alternatives, supports the Bus Rapid Transit (BRT) system without the current Waikiki routing.

Our concern is the loss of an already scarce asset - the loading zone. It does not make much sense to try and expedite people movement if trucks and tour vehicles must stop wherever they can to get their job done and in the process inhibit traffic.

Loss of loading zones affect the ability of the property motor carriers (trucks) to feed the needs of the businesses, patrons, and employees of the Waikiki and Downtown areas reliably and continuously. The loss also precludes passenger motor carriers (tour vehicles) from providing the highest degree of transportation service to our visitors.

The current inventory of loading zones is already inadequate. This was acknowledged long ago by the City's Department of Transportation Services who conceived the plan to utilize long stretches of Kalakaua and Kuhio Avenue curbsides to augment loading and unloading capacities.

Plans for the transit system to utilize the Kalakaua Avenue curbside lane is a tremendous concern if the lane is to be an exclusive use lane. The mauka and makai curbside lanes of Kalakaua serve as THE major loading zone area to service all street front customers since the majority of properties failed to provide adequate, or any, off street loading facilities.

Tour vehicles are especially limited as they must use the makai curb or risk injury to passengers if they must load or unload them into traffic while parked on mauka curbs.

Even a semi-exclusive lane for the BRT will have a tremendous impact. Current traffic and servicing activities are at a very delicate balance on Kalakaua - without City buses - the addition of BRT with headways of four minutes or so will destroy that balance.

Kuhio Avenue is no different. Curbside serves as the primary loading zone and is so important just because of the number of small businesses along that corridor.

The nature of motor carrier loading and unloading does not mix well with the concept of fast, frequent, high volume public transit if they are in the same lane.

Property carriers make multiple high and low volume deliveries to provide Waikiki with everything it needs. Property carriers need:

- loading zones in proximity to their customers so the various needs can be met quickly and in a "just in time" manner to effect cost savings for everyone;
- enough loading zone area so multiple trucks can make deliveries at one time to reduce the number that need to circle the block hunting for available space creating more congestion;
- enough time in the loading zone to deliver everything from the one basket of flowers to the half truckload of beverages to the truckload of meat and vegetables; and
- enough time in the loading zone to get the load into the back of the hotel or store, or to the 20<sup>th</sup> floor, and get the appropriate signature to conclude the transaction.

Passenger carriers make multiple high and low volume stops to offer Hawaii's visitors the highest degree of transportation service and convenience. Passenger carriers need:

- the ability to pick up and drop off visitors and their bags at their hotel door;
- to make multiple stops for the convenience of their customers;
- time to accommodate the customer who has paid for the transportation when a little slow while boarding, or a little late for boarding; and
- time to service the customer who is mystified and confused in a new place that has hard to pronounce street names, unfamiliar surroundings, and limited knowledge in ascertaining where to board or alight from their vehicle.

Loading zones are the key to motor carrier services and motor carrier services are key to Waikiki's viability. Loading zones losses to accommodate the BRT system is counterproductive to Waikiki's viability.

One of the BRT's primary functions is to expedite the movement of employees in to and out of Waikiki. This can be accomplished with a shuttle bus system running in a loop from the Ala Moana BRT Transit Center.

Buses are particularly adept at showing up during peak needs and disappearing with no trace during non-peak hours, which dovetails nicely with the shift change peaks in Waikiki. This shuttle would serve to augment whatever regular bus schedule is warranted for Waikiki.



Furthermore, the transportation needs of our visitors between Waikiki and other points are well serviced by the passenger carriers who are fully flexible to accommodate varying capacities and routes. Passenger carriers provide a high service level mass transit operation that takes additional cars and drivers - who may be unfamiliar with our roads, rules and maybe left hand steering position - off our roads.

However, the passenger carriers are very aware that the BRT will compete for riders with a subsidized fee that no one can compete with. Consequently, the BRT adversely impacts the carriers' survivability. Although this is not the stated intent, past actions have molded the competition belief:

- \$10 four day pass which is marketed to short term visitors;
- Promotion of OTS services through schedules published in the Japanese language (for which OTS receives a royalty) and distributed in Japan; and
- Increased service to Hanauma Bay after passengers carriers were precluded from providing transportation there.

The competition is contrary to federal policy and is particularly hurtful since public funds (including passenger carrier tax revenues) subsidizes the visitors' rides.

In conclusion, HTA supports improvements to Oahu's public transit system, but is concerned about the loss of loading zones in Downtown and does not believe the current Waikiki service is desired in the overall operational environment.

Thank you.

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
MAYOR

CHERYL O. SOOH  
DIRECTOR

GEORGE "KEDI" MIYAMOTO  
DEPUTY DIRECTOR

TPD1100-05378R

November 13, 2002

Mr. Gareth Sakakida, Managing Director  
Hawaii Transportation Association  
P. O. Box 30166  
Honolulu, Hawaii 96820

Dear Mr. Sakakida:

Subject: Primary Corridor Transportation Project

This is in response to your October 5, 2000 letter, your November 6, 2000 letter, your November 14, 2000 written testimony, and your oral testimony at the November 14, 2000 Special Transportation Committee Meeting regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DIEIS).

1. HTA's primary concern with the Transportation System Management and the Bus Rapid Transit concepts is the loss of loading zones anywhere along the project's line, and especially in the Waikiki and Downtown areas.

**Response:** In the Public Outreach for the Project, the City established a Working Group (WG) for the Waikiki area composed of representatives from the hotels, retail and service industries, commercial passenger and freight carriers, and residents. A detailed study of passenger and freight loading activities was performed and reviewed with the Waikiki WG. Discussions with this Working Group led to revisions in the proposed project that resulted in no appreciable loss of on-street loading space along Kalakaua and Kuhio Avenues. This was achieved by allowing freight carriers to use the BRT shared lane during legal delivery hours (10 P.M. to 9 A.M. on Kalakaua Avenue and 10 P.M. to 7:30 A.M. on Kuhio Avenue); during these time periods the BRT would simply pass around a stopped loading truck by using the adjacent traffic lane. In Downtown the In-Town BRT would operate on Hotel Street which is already a transit mall; Bishop Street where the BRT would operate in mixed traffic; Alakea Street where the BRT would operate in mixed traffic except during the P.M. peak period, at which time truck loading for Bishop Square would be prohibited (trucks could use the building's off-street freight loading facilities or the freight loading zone on the Koko Head side of Alakea); and Richards Street where no loading zones would be affected.

While some loading zones may need to shift locations slightly, no private bus loading zones will be eliminated in Downtown or Waikiki as part of the PCTP. To the contrary, private bus carriers will benefit from being able to use the transit priority lanes in Waikiki.

2. Loss of loading zone space affects the ability of the motor carriers to feed the needs of the businesses, patrons, and employees of the Waikiki and Downtown area reliably and continuously. The current inventory of loading zones is already inadequate in both areas.

Response: See response to comment #1.

3. Plans for the transit system to utilize Kalakaua Avenue curbside lane is a tremendous concern if the lane is to be an exclusive use lane. The mauka and makai curbside lanes of Kalakaua serve as THE major loading zone area to service all street front customers since the majority of properties failed to provide adequate, or any, off street loading facilities.

Response: See response to comment #1.

4. Tour buses especially must use the mauka curb or risk injury to passengers if they must unload them into traffic while parked on the mauka curb.

Response: As described in the response to comment #1, tour buses and other vehicles loading and unloading passengers or freight would be allowed to continue using the mauka lane of Kalakaua Avenue. Moreover, existing loading zones for the Sheraton Moana Surfside and Outrigger on the Beach hotels would also remain accessible. The Sheraton Waikiki and Royal Hawaiian Shopping Center have off-street loading facilities.

5. The City's DTS long ago acknowledged the problem with a short inventory of loading zone space and conceived the plan to allow the use of long stretches of Kalakaua and Kuhio Avenue curbsides to augment loading and unloading capacity.

Response: See responses to comments #1 and #4.

6. So when the paucity of legal loading zones prevents them from servicing their customers, they will do whatever they can to accomplish the service. In short, this means double parking, parking on sidewalks, etc., taking a chance that they won't get caught. It becomes easier to pay a fine than to have the customer perceive you cannot provide the necessary service.

Response: See responses to comments #1 and #4.

7. In conclusion, HTA does not oppose improvements to Oahu's transit system. However, we are concerned about the loss of an already scarce asset - the loading zone. It does not make too much sense to expedite people movement if trucks and buses must park wherever they can, just for a minute, to get their job done and in the process inhibit traffic.

Response: See responses to comments #1 and #4. Also, please note that bus loading zones on Kuhio and Kalakaua Avenues would continue to be provided with the Refined LPA.

8. The HTA Passenger Carrier Conference supports the Bus Rapid Transit (BRT) alternative, provided that it does not include the proposed Waikiki segment.

Response: Comment noted. It is a statement of the commenter's preference for a LPA.

9. The primary concern of HTA's Passenger Carrier Conference with the MISDEIS for the Primary Corridor Transportation Project is that it does not address the negative impact the BRT will have on those visiting Waikiki and on the private passenger carriers which serve them.

Response: Based on the analysis of the potential impacts on private transportation providers in Waikiki as discussed in Chapter 5 of the FEIS, private transportation providers would not be

significantly adversely affected by the Refined LPA since they service different travel markets. In addition, the Refined LPA will not adversely affect existing loading space along streets in Waikiki. The MISDraft EIS document does not adequately demonstrate an understanding of how the visitor industry operates in general nor how the passenger carriers that serve that industry operate in particular.

Response: In the Public Outreach for the Project, the City established a Working Group (WG) for the Waikiki area composed of representatives from the hotels, retail and service industries, commercial passenger and freight carriers, and residents. A detailed study of passenger and freight loading activities was performed and reviewed with the Waikiki WG. Discussions with this Working Group led to revisions in the proposed project that would result in no appreciable loss of on-street loading space along the streets used by the BRT.

11. Federal law is very clear that in planning new transportation programs to be financed from federal funds, consideration must be given to preserving and utilizing existing transportation facilities, both public and private.

Response: Comment noted. The proposed project accomplishes this.

12. Furthermore, in planning such new systems, federal law requires that the overall social, economic, energy and environmental impacts be considered. These federal objectives have not been sufficiently achieved in the MISDraft EIS.

Response: FEIS Chapter 4, Transportation Impacts, and Chapter 5, Environmental Analysis and Consequences, sufficiently disclose potential social, economic, energy and environmental impacts resulting from the various alternatives.

13. The MISDraft EIS does not address the impact of any of the three alternatives it puts forth on privately owned and operated passenger carriers. It does not discuss whether pursuing the no-build, the TSM or the BRT alternatives will reduce the revenues of any of these businesses. There is no discussion of whether City and State tax revenues derived from passenger carriers will be reduced as a result of the impact of pursuing any of the three alternatives.

Response: As discussed in Chapter 5 of the FEIS, there is not expected to be any significant reduction in revenues of privately owned and operated passenger carriers as a result of the No-Build, TSM or Refined LPA Alternatives.

14. The key element of the service issue is loading zones. Loss of loading zone space affects the ability of the passenger carriers to meet the needs of hotels and visitors of Waikiki reliably and continuously. The current inventory of loading zones is already inadequate along Kalakaua and Kuhio Avenues.

Response: See responses to comments #1 and #4.

15. Plans for the transit system to utilize the Kalakaua Avenue curbside lane is a tremendous concern if the lane is to be a semi-exclusive use lane. The mauka curbside lane of Kalakaua serves as THE major loading zone area to service all street front customers since the majority of properties failed to provide adequate, or any, off street loading facilities.

Response: See responses to comments #1 and #4.

16. Private tour buses and trolleys must use the marked curb on Kalakaua for loading and unloading their passengers or risk injury to them if they are unloaded into traffic while the tour bus or trolley is parked along the mauka curb. Furthermore, the nature of the business makes it difficult to load and unload paying customers in a short period of time.

Response: See responses to comments #1 and #4.

17. The City's DTS long ago acknowledged the problem with a short inventory of loading zone space and conceived the plan to allow the use of long stretches of Kalakaua and Kuhio Avenue curbsides to augment loading and unloading capacity.

Response: See responses to comments #1 and #4.

18. The lack of adequate loading zones makes it difficult or impossible for private passenger carriers to serve visitors and serve them well. This may lead travel wholesalers to recommend other destinations to their clients. The consequence of a reputation for inadequate service is likely to be fewer visitors. The passenger carriers will obviously suffer if this were to happen, but so would the hotels and the visitor industry and in turn all of Hawaii including government. Therefore, it does not make sense to expedite people movement if buses must park wherever they can, just for a minute, to get their job done and in the process inhibit traffic.

Response: See response to comments #1, #4 and #7.

19. We also believe that the needs of our visitors to move between Waikiki and the convention center and shopping areas are adequately served by the present system. Private passenger carriers provide flexibility when it comes to capacity and routes. Depending on demand, various sized and types of vehicles can be utilized to accommodate anticipated passenger loads.

Response: Based on the analysis of the potential impacts on private transportation providers in Waikiki as discussed in Chapter 5 of the FEIS, the private transportation providers will not be affected by the Refined LPA since they serve different travel markets. Therefore, private tour bus and trolley operators will still be needed to serve the tourist market even after BRT is implemented.

The BRT routings, stop locations and other features are designed to serve trips by Oahu residents when going to-and-from home, work, school, shopping and other purposes. It is not designed to serve the tourist market as are the private bus operations in Honolulu. Unlike the private sector buses the In-BRT would not pick passengers up at their hotels and take them on various scenic tours. It would not take them to-and-from the Airport. It would not take them to-and-from their hotels and the Convention Center. It would not pick them up at the cruise ship terminal and carry them and their bags directly to their hotels. And unlike the private shuttles it is not designed to operate in a loop that only goes between Waikiki hotels and the various tourist sites of interest. Yes some tourists may end up using BRT since it does serve some of the same destinations that the tourists want to go to, but the In-BRT goes to these places because most of these are also major employment sites or sites where local residents go to as well. The number of tourists expected to use the public transit system with the Refined LPA is forecast to be no greater proportionally than today (i.e. around 10-15 percent of total daily boardings).

20. Contrary to Federal policy, the BRT in Waikiki would be compelling and thereby taking away business from private passenger carriers that provide the same service. Consequently, this will have an adverse effect on the survivability of the private carriers.

Response: As indicated in response to comment #19, the Refined LPA will not be compelling and taking away business from private passenger carriers since the travel market served by private operators such as taxis, shuttles, etc., is distinctly different from that serviced by the Refined LPA. The travel market serviced by private operators would still need their services even with the implementation of the Refined LPA.

Rather than taking away business, implementation of the PCTP, including implementation of the hub-and-spoke bus system, could provide opportunities for privatization. The concept of the hub-and-spoke bus system includes circulator buses collecting riders from certain routes (spokes) and dropping them off at various "hubs" in the community located along the main transit spine. These circulator routes could be serviced by privately owned transportation operators.

21. The City states that its bus lines exist to serve residents, especially employees of the visitor industry, and not compete directly with private passenger carriage, but its behavior says otherwise. There are many examples of this, some of which are noted below: a) The City provides a \$10, four-day pass, which exists for and is marketed to short-term visitors; b) The City's OTS facilitate the promotion of its services through schedules published by private firms in the Japanese language and distributed in Japan for which OTS receives a royalty; c) The City monopolizes pick-up and delivery service to specific visitor destinations, e.g., Hanauma Bay; d) The City highly subsidizes travel of visitors on its buses.

Response: OTS provides bus service primarily to residents of Oahu. Being a general public transit system, TheBus is available for use by visitors as well as residents, which is similar to other public transit systems around the world.

OTS sells a variety of individual rider passes for residents (adults, students, seniors and the disabled) and a visitor pass for \$15, which allows for unlimited use during a four-consecutive day period only. These visitor passes are available at all ABC Stores in Waikiki, Ala Moana Shopping Center, and at TheBus pass office. As is typical of public transit system throughout the nation, TheBus is subsidized and all riders, residents and visitors alike, benefit from this subsidy.

There are bus publications commercially sold (in English and Japanese) by Obun Hawaii, Inc. to assist visitors who choose to ride public transportation. There is also a travel guide, Michael Breit's Guide to Honolulu & TheBus, which can be purchased by residents and visitors. The City does not receive a royalty for the sale of these publications and it is not involved in promoting the sale of these publications. The City received a royalty for the use of TheBus logo on the publications. As is noted in these publications, TheBus does travel to past certain visitor sites or destinations while serving residents and therefore could be used by non-residents as well. Honolulu (Oahu) like other travel destinations offers its visitors many choices of transportation and scenic tour modes, including private carriage companies, taxis, limousines, rental vehicles and TheBus. The Honolulu City Council instituted a limit of access to Hanauma Bay to protect this fragile and unique natural attraction. TheBus, too, is limited in its service for residents and visitors to this part of Oahu for the very same reason that other passenger carriers are restricted access to this site.

22. It has been stated several times by the City that one of the main reasons for the BRT's Waikiki branch is to expedite the movement of employees into and out of Waikiki. We believe that the City does not have to build a BRT entering Waikiki to accomplish this. Peak ridership for Waikiki employees occurs in the morning, when they are going to work, and in the afternoon, when they leave to return home. A shuttle bus system running between Ala Moana Center and Waikiki, operated by the City or a private carrier, primarily during times of shift changes, can alleviate this problem by augmenting the current bus system. This shuttle bus system would also provide an additional benefit by freeing up much needed capacity on existing City buses for Waikiki residents.

Response: With a high concentration of jobs, residences and visitor venues in a small area with few access points, Waikiki streets are congested during much of the day. To serve the high level of resident/worker transit demand a system is proposed that will allow BRT vehicles to bypass this congestion using bus priority lanes and other techniques. The BRT system will permit transit passengers to board anywhere along the route and complete their journey in Waikiki without having to transfer to a shuttle at Ala Moana Center. Other passengers who boarded buses not along the BRT route could transfer to the BRT at Ala Moana Center or many of the other transit centers and transfer points in the system. With this approach many riders could have a transfer free trip to-and-from Waikiki, whereas with a shuttle bus system everyone would have to transfer at Ala Moana Center.

Additionally, the In-Town BRT is intended to not only serve Waikiki workers (who, by the way, do not all arrive and depart at the same time). The BRT would benefit Waikiki residents and residents throughout the island who go to Waikiki for entertainment, shopping, and recreation.

23. In conclusion, HTA does not oppose improvements to Oahu's transit system. We firmly believe, however, that it is not necessary to include a Waikiki branch in the BRT alternative. If, nonetheless, a decision is made to enter Waikiki, then HTA recommends that the City: 1) enter into a dialogue with the members of the HTA Passenger Carrier Conference and others exploring the possibility of using Kuhio Avenue or Kuhio Avenue and Ala Wai Boulevard for its BRT vehicles; and 2) keep those BRT vehicles off Kalakaua Avenue.

Response: The proposed routing of the BRT with a one-way loop on Kalakaua and Kuhio Avenues was found to best serve the travel needs of the projected users of this portion of the system, namely Waikiki workers, Waikiki residents and visitors to Waikiki (Oahu residents and tourists). Between Saratoga Road and Kapahulu Avenue in Waikiki there are approximately 14,300 jobs along Kalakaua Avenue, 10,500 along Kuhio Avenue and 1,500 along Ala Wai Boulevard. There are 1,700 housing units along Kalakaua, 4,200 along Kuhio, and 4,500 along Ala Wai Boulevard. There are 12,200 hotel rooms along Kalakaua, 4,200 along Kuhio, and 800 along Ala Wai Boulevard. In other words a loop along Kalakaua and Kuhio Avenues would directly serve all of these potential users, whereas a two-way operation on Kuhio would only displace passenger and freight loading zones or would result in traffic delays if the loading zones weren't displaced. In contrast, the Kalakaua/Kuhio loop would maintain auto access as well as passenger and freight loading zones on both Kalakaua and Kuhio Avenues.

The Kuhio/Ala Wai loop would be even further removed from the large number of jobs and hotel rooms on Kalakaua Avenue. While a Kuhio/Ala Wai loop would more directly serve the residents in this section of Waikiki, the problem is that only about one-third of the projected BRT riders in this section of Waikiki would be Waikiki residents. It is estimated that about 45 percent of the BRT users in this section of Waikiki would be Waikiki workers, 10 percent would be Oahu residents visiting Waikiki for business, shopping or recreation, and 12 percent would be tourists.

For these workers and visitors the Kalakaua/Kuhio loop would more directly serve their needs. Travel time analyses indicate that with the Kuhio/Ala Wai Alternative an extra 3.1 minutes trip time would be added to 83 percent of the projected BRT riders starting their trip in this part of Waikiki, when compared to the Kalakaua/Kuhio loop. As far as effects to private tour vehicles, loading zones for private buses are proposed to be retained on Kalakaua and Kuhio Avenues with the Refined LPA.

24. HTA supports improvements to Oahu's transit system, and of the three alternatives, supports the Bus Rapid Transit (BRT) system without the current Waikiki routing.

Response: Comment noted. It states the commenter's preference for the LPA.

25. Our concern is the loss of an already scarce asset - the loading zone. It does not make much sense to try and expedite people movement if trucks and tour vehicles must stop wherever they can to get their job done and in the process inhibit traffic. Loss of loading zones affect the ability of the property motor carriers (trucks) to feed the needs of the businesses, patrons, and employees of the Waikiki and Downtown areas reliably and continuously. The loss also precludes passenger motor carriers (tour vehicles) from providing the highest degree of transportation service to our visitors. The current inventory of loading zones is already inadequate. This was acknowledged long ago by the City's Department of Transportation Services who conceived the plan to utilize long stretches of Kalakaua and Kuhio Avenue curbsides to augment loading and unloading capacities.

Response: See responses to comments #1, #4 and #7.

26. Plans for the transit system to utilize the Kalakaua Avenue curbside lane is a tremendous concern if the lane is to be an exclusive use lane. The mauka and makai curbside lanes of Kalakaua serve as THE major loading zone area to service all street front customers since the majority of properties failed to provide adequate, or any, off street loading facilities. Tour vehicles are especially limited as they must use the mauka curb or risk injury to passengers if they must load or unload them into traffic while parked on mauka curbs.

Response: See responses to comments #1 and #4.

27. Even a semi-exclusive lane for the BRT will have a tremendous impact. Current traffic and servicing activities are at a very delicate balance on Kalakaua - without City buses - the addition of BRT with headways of four minutes or so will destroy that balance.

Response: See responses to comments #1 and #4.

28. Kuhio Avenue is no different. Curbside serves as the primary loading zone and is so important just because of the number of small businesses along that corridor.

Response: See responses to comments #1 and #7.

29. The nature of motor carrier loading and unloading does not mix well with the concept of fast, frequent, high volume public transit if they are in the same lane.

Response: See responses to comments #1 and #7.

Mr. Gareth Sakakida  
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30. Property carriers make multiple high and low volume deliveries to provide Waikiki with everything it needs. Property carriers need:
- a) loading zones in proximity to their customers so the various needs can be met quickly and in a just in time manner to effect cost savings for everyone;
  - b) enough loading zone area so multiple trucks can make deliveries at one time to reduce the number that need to circle the block hunting for available space creating more congestion;
  - c) enough time in the loading zone to deliver everything from the one basket of flowers to the half truckload of beverages to the truckload of meat and vegetables; and
  - d) enough time in the loading zone to get the load into the back of the hotel or store, or to the 20<sup>th</sup> floor, and get the appropriate signature to conclude the transaction.

Response: With the Refined LPA, freight deliveries will be permitted in the curb lanes on Kalakaua and Kuhio Avenues as they are today between the hours of 10 P.M. and 9 A.M. on Kalakaua Avenue and 10 P.M. and 7:30 A.M. on Kuhio Avenue. In addition, freight loading will be permitted in designated turnouts on Kalakaua and Kuhio Avenues during other times of the day. (See also responses to comments #1 and #7).

31. Passenger carriers make multiple high and low volume stops to offer Hawaii's visitors the highest degree of transportation service and convenience. Passenger carriers need:
- a) the ability to pick up and drop off visitors and their bags at the hotel door;
  - b) to make multiple stops for the convenience of their customers;
  - c) time to accommodate the customer who has paid for the transportation when a little slow while boarding, or a little late for boarding; and
  - d) time to service the customer who is mystified and confused in a new place that has hard to pronounce street names, unfamiliar surroundings, and limited knowledge in ascertaining where to board or alight from their vehicle.

Response: Turnouts for passenger carrier loading are proposed along Kalakaua and Kuhio Avenues in the Refined LPA.

32. Loading zones are the key to motor carrier services and motor carrier services are key to Waikiki's viability. Loading zones losses to accommodate the BRT system is counterproductive to Waikiki's viability.

Response: See responses to comments #30 and #31.

33. One of the BRT's primary functions is to expedite the movement of employees in to and out of Waikiki. This can be accomplished with a shuttle bus system running in a loop from the Ala Moana BRT Transit Center.

Response: See response to comment #22.

34. Buses are particularly adept at showing up during peak needs and disappearing with no trace during non-peak hours, which dovetails nicely with the shift change peaks in Waikiki. This shuttle would serve to augment whatever regular bus schedule is warranted for Waikiki.

Response: The BRT service schedules will vary during the day in response to passenger demand.

Mr. Gareth Sakakida  
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35. Furthermore, the transportation needs of our visitors between Waikiki and other points are well served by the passenger carriers who are fully flexible to accommodate varying capacities and routes. Passenger carriers provide a high service level mass transit operation that takes additional cars and drivers - who may be unfamiliar with our roads, rules and maybe left hand steering position - off our roads.

Response: Based on the analysis of the potential impacts on private transportation providers in Waikiki as discussed in Chapter 5 of the FEIS, the private transportation providers will not be significantly adversely affected by the Refined LPA since they service different travel markets. Therefore, visitors will still be able to use the services of private transportation carriers.

36. However, the passenger carriers are very aware that the BRT will compete for riders with a subsidized fee that no one can compete with. Consequently, the BRT adversely impacts the carriers' survivability. Although this is not the stated intent, past actions have molded the competition belief:
- a) \$10 four day pass which is marketed to short term visitors;
  - b) Promotion of OTS services through schedules published in the Japanese language (for which OTS receives a royalty) and distributed in Japan; and
  - c) Increased service to Hanauma Bay after passenger carriers were precluded from providing transportation there.
- The competition is contrary to federal policy and is particularly hurtful since public funds (including passenger carrier tax revenues) subsidizes the visitors' rides.

Response: See response to comment #21.

37. In conclusion, HTA supports improvements to Oahu's public transit system, but is concerned about the loss of loading zones in Downtown and does not believe the current Waikiki service is desired in the overall operational environment.

Response: Comment noted. It is a statement of the commenter's preference for an LPA.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

**KAPIOLANI PARK PRESERVATION SOCIETY**

P.O. Box 3059, Honolulu HI 96802

3 May 2002

**MAY 6 2002**

Federal Transit Administration, Region IX  
U.S. Department of Transportation  
201 Mission Street, Suite 2210  
San Francisco, California 94105-1839  
Attention: Mr. Ray Sukys and Ms. Donna Turchie

Federal Highways Administration  
Prince Jonas Kuhio Kalaniana'ole Federal Building  
300 Ala Moana Boulevard  
Honolulu, Hawaii 96813  
Attention: Mr. Abraham Wong and Mr. Bruce Turner

Hawaii Office of Environmental Quality Control  
State Office Tower, Suite 702  
235 South Beretania Street  
Honolulu, Hawaii 96813  
Attention: Ms. Genevieve Salmonson, Director

Department of Transportation Services  
City and County of Honolulu  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813  
Attention: Ms. Cheryl Soon, Director

Subject: Concerns Related to the Impact of Bus Rapid Transit  
(BRT) on Kapiolani Park

Dear All Concerned:

The mission of the Kapiolani Park Preservation Society (a non-profit corporation) is to see that the Trust provisions establishing the Park are respected and enforced. King Kalakaua and William G. Irwin contributed their private lands for a "free public park and recreation ground forever", as placed in Trust for the people of Honolulu. The Society is concerned that

KPPS: BRT Impact on Kapiolani Park, page 2

plans for the proposed Bus Rapid Transit system could lead to conflict with Park Trust provisions and possible litigation with the Society. It is imperative that the impact of this proposed system on the Park be considered from both environmental and legal perspectives.

While it is clear that Park users would appreciate good mass transit service to the Park's edge, it appears, from the sparse available planning material, that the Park is envisioned as the in-town BRT line's eastern point of contact for BRT's interface with transportation services in East Honolulu. Kapiolani Park is listed on the Hawaii State Register of Historic Places. Recent Court rulings have indicated that municipal facilities are not an appropriate use of Kapiolani Park Trust lands. Therefore a transportation transfer point for traffic to East Honolulu could not be built at the Park.

It is not clear to us why this Waikiki to downtown segment of the proposed project is being fast tracked without the necessary proper studies, community review workshops, and hearings. It will be time consuming for all of us if you rush ahead with these plans only to end up with a flawed system prone to challenge.

If the planning process is flawed as it relates to its impact on Honolulu's most significant major park, it may be flawed as it relates to other portions of the city's fabric. A project of this magnitude needs to be arrived at through further study and an open planning process.

We would welcome the opportunity to work with you closely on issues related to Kapiolani Park.

Sincerely,

*Jack Gillmar*  
Jack Gillmar  
President

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
150 SOUTH KING STREET, 2ND FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 523-4529 • Fax: (808) 523-4730 • Internet: www.cd.honolulu.hi.us

JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

FAX to:  
Federal Transit Administration, Region IX  
U.S. Department of Transportation  
201 Mission Street, Suite 2210  
San Francisco, California 94105-1839  
Attention: Mr. Ray Sukys and Ms. Donna Turchie

Federal Highways Administration  
Prince Jonas Kuhio Kalanianaʻole Federal Building  
300 Ala Moana Boulevard  
Honolulu, Hawaii 96813  
Attention: Mr. Abraham Wong and Mr. Bruce Turner

Hawaii Office of Environmental Quality Control  
State Office Tower, Suite 702  
235 South Beretania Street  
Honolulu, Hawaii 96813  
Attention: Ms. Genevieve Salmonson, Director

Department of Transportation Services  
City and County of Honolulu  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813  
Attention: Ms. Cheryl Soon, Director

FROM: Kapiolani Park Preservation Society

Date: 5/6/2

Total # of pages including cover: 3



TPD502-01813R  
TPD502-01921R

November 13, 2002

Mr. Jack Gilmar  
President  
Kapiolani Park Preservation Society  
P. O. Box 3059  
Honolulu, Hawaii 96802

Dear Mr. Gilmar:

Subject: Primary Corridor Transportation Project

This is in response to your May 3, 2002 letter regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS). We have the following responses:

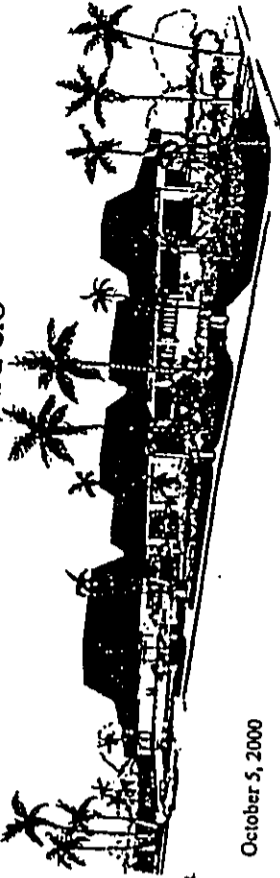
1. *The mission of the Kapiolani Park Preservation Society (a non-profit corporation) is to see that the Trust provisions establishing the Park are respected and enforced. King Kalakaua and William G. Inyin contributed their private lands for a "free public park and recreation ground forever", as placed in Trust for the people of Honolulu. The Society is concerned that plans for the proposed Bus Rapid Transit system could lead to conflict with Park Trust provisions and possible litigation with the Society. It is imperative that the impact of this proposed system on the Park be considered from both environmental and legal perspectives.*

*Response: The only element of the In-town BRT system near Kapiolani Park is a transit stop within the right-of-way of Kapahulu Avenue, fronting the landscaped area of Honolulu Zoo and adjacent to the pedestrian path. We will consult with the Kapiolani Park Preservation Society on the physical appearance of this transit stop, such as using shelters for BRT users.*

2. *While it is clear that Park users would appreciate good mass transit service to the Park's edge, it appears, from the sparse planning material, that the Park is envisioned as the in-town BRT line's eastern point of contact for BRT's interface with transportation services in East Honolulu. Kapiolani Park is listed on the Hawaii State Register of Historic Places. Recent Court rulings have indicated that municipal facilities are not an appropriate use of Kapiolani Park Trust lands. Therefore a transportation transfer point for traffic to East Honolulu could not be built at the Park.*

*Response: It is not proposed to place a transit center on Kapiolani Park Trust lands. Any transfers near Kapiolani Park would occur at the planned transit stop described in our response to Comment #1.*

3. *It is not clear to us why this Waikiki to downtown segment of the proposed project is being fast tracked without the necessary proper studies, community review workshops, and hearings. It will be time consuming for all of us if you rush ahead with these plans only to end up with a flawed system prone to challenge.*



October 5, 2000

- EMILIO SACUBO  
President
- ELVIN A. CEDER  
Vice President
- ELVIN H. KALANALA, JR.  
Secretary
- JIMMY J. ANDELI, JR.  
Treasurer
- JAMES KUTAU, III  
Director
- EMERY LOO  
Director
- ANTON SACUBO  
Director
- KEVIN TAITAN  
Director
- TELENDSEY  
Director
- DEL MORCOWA  
Director
- OSCAR KALA  
Director

The Honorable Duke Baimum, Chair of the Transportation Committee  
Honolulu City Council  
Honolulu Hale  
530 South King Street  
Honolulu, HI 96813

TESTIMONY IN SUPPORT OF Primary Corridor Transportation Project

Hearing Date: Thursday, October 5, 2000  
Time: 6:30 p.m.  
Hearing Location: Hawaii Convention Center

Transportation Chair Baimum and Distinguished Members of the Transportation Committee:

Thank you for allowing me the opportunity to appear before you today as you consider taking action on the Primary Corridor Transportation Project. On behalf of the Laborers' Union, and each of its members, I would like to seek your support in moving forward with the Bus Rapid Transit option currently being considered by the Committee.

Honolulu is currently in dire need of an improvement to the public transportation system given the number of hours people currently spend in traffic and the growing need for alternatives to the use of the automobile. Moreover, given the importance of our visitor industry, the ability to get to and from Waikiki, and beyond, as well as throughout the island during a visit, is vitally important to our ongoing mission to maintain Hawaii as premier international destination for travelers.

Mr. Jack Gillmar  
Page 2  
November 13, 2002

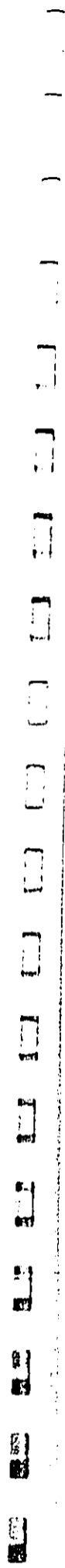
**Response:** The Primary Transportation Corridor Project was initiated in September 1998 with gathering public input to create and refine the Islandwide Mobility Concept Plan. There have been hundreds of public meetings regarding the project, plus the six working groups that were formed in the areas along the BRT corridor. The project team members have attended an abundance of meetings to discuss the project. Community involvement will continue throughout the project.

4. *If the planning process is flawed as it relates to its impact on Honolulu's most significant major park, it may be flawed as it relates to other portions of the city's fabric. A project of this magnitude needs to be arrived at through further study and an open planning process.*

**Response:** Comment noted. It is a statement of opinion. See responses to comments #1, #2, and #3.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,  
*Ceryl D. Soon*  
CHERYL D. SOON  
Director





TESTIMONY IN SUPPORT OF Primary Corridor Transportation Project  
Page 2 of 2

Additionally, the benefits of a modern Bus Rapid Transit System will be felt by the community at large both immediately, and for generations to come. As to the immediate benefits, the proposed projects could potentially create as many as 3000 new jobs in the construction industry alone. As always, work opportunity creates tax revenue and greater spending, which helps to benefit our economy overall.

As to the future benefits, most are obvious, but worth repeating. Future generations will have meaningful and viable options to choose from when deciding how they commute to and from work. Also, an improved public transportation system would bring about greater access to the outlying communities, particularly Kapolei, which will expedite the growth of Oahu's Second City.

The time to take action on bringing about a new and improved Bus Rapid Transit system is now. One need only try to commute to or from work during peak traffic times and they will realize that improvement is needed. You have before you today a realistic, environmentally friendly, and fiscally responsible option that seeks to address a fundamental community concern. I urge you to move forward on making the new Bus Rapid Transit System a reality for all the benefits it offers to our community.

Thank you for allowing me the opportunity to testify. I would be happy to answer any question that the Committee may have.

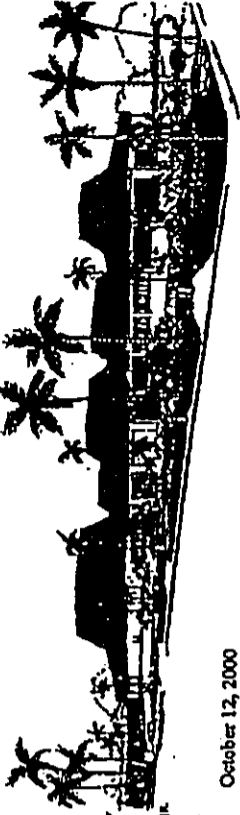
Respectfully submitted,

*Antonio J. Saguibo, Jr.*  
Antonio J. Saguibo, Jr.  
Union Representative



RENJAN SAGIBO  
President  
MELVIN A. CRUZ  
President  
LADENIA KALAJANA, Jr.  
President  
NORMAN JANCZEK, Jr.  
President  
OLIVER KIRWAN, Jr.  
President  
HARVEY LEO  
President  
CLAYTON SACIBO  
President  
RODRIGUEZ  
President  
FRANKLIN  
President  
NORBERTO  
President  
GEORGE  
President

LABORERS' INTERNATIONAL UNION OF NORTH AMERICA  
LOCAL 368 AFL-CIO



October 12, 2000

VIA FACSIMILE ONLY 513-4730

Cheryl D. Sooa, Director,  
Department of Transportation Services,  
City and County of Honolulu  
711 Kapiolani Blvd., Suite 1200  
Honolulu, HI 96813

TESTIMONY IN SUPPORT OF Primary Corridor Transportation Project

Hearing Date: Thursday, October 12, 2000  
Time: 7:00 p.m.  
Hearing Location: Bidsell Center, Hawaii Room

Dear Ms. Sooa:

Thank you for allowing me the opportunity to submit the below written testimony in support of the Primary Corridor Transportation Project. On behalf of the Laborers' Union, and each of its members, I would like to seek your support in moving forward with the Bus Rapid Transit option currently being considered by the City Council.

Honolulu is currently in dire need of an improvement to the public transportation system; given the number of hours people currently spend in traffic and the growing need for alternatives to the use of the automobile. Moreover, given the importance of our visitor industry, the ability to get to and from Waikiki, and beyond, as well as throughout the island during a visit, is vitally important to our ongoing mission to maintain Hawaii as premier international destination for travelers.

TESTIMONY IN SUPPORT OF Primary Corridor Transportation Project  
Page 2 of 2

Additionally, the benefits of a modern Bus Rapid Transit System will be felt by the community at large both immediately, and for generations to come. As to the immediate benefits, the proposed projects could potentially create as many as 3000 new jobs in the construction industry alone. As always, work opportunity creates tax revenue and greater spending, which helps to benefit our economy overall.

As to the future benefits, most are obvious, but worth repeating. Future generations will have meaningful and viable options to choose from when deciding how they commute to and from work. Also, an improved public transportation system would bring about greater access to the outlying communities, particularly Keolu, which will expedite the growth of Oahu's Second City.

The time to take action on bringing about a new and improved Bus Rapid Transit system is now. One need only try to commute to or from work during peak traffic times and they will realize that improvement is needed. You have before you today a realistic, environmentally friendly, and fiscally responsible option that seeks to address a fundamental community concern. I urge you to move forward on making the new Bus Rapid Transit System a reality for all the benefits it offers to our community.

Thank you for allowing me the opportunity to submit the aforementioned written testimony for your consideration.

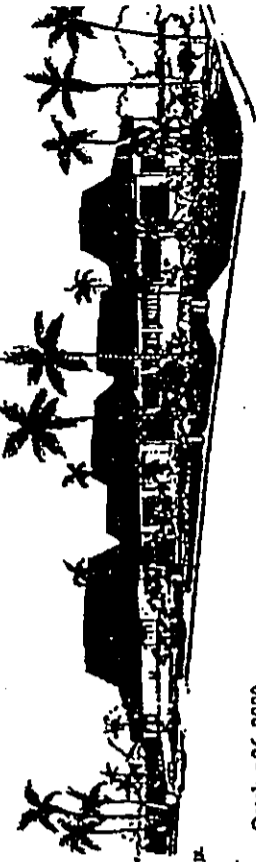
Respectfully submitted,

  
Antonio J. Saghio, Jr.  
Union Representative



BENJAMIN SAGIBO  
Executive Director  
LIUNA  
ALVIN A. CREMER  
President  
LIUNA  
KALANAN OLUKOJA, JR.  
Honorable Chair  
LIUNA  
NORMAN J. WOOD, JR.  
Honorable Chair  
LIUNA  
CLAYTON SAGIBO  
Executive Director  
LIUNA  
SICK PACATAJAN  
Executive Director  
LIUNA  
NOEL MOOREJANA  
Executive Director  
LIUNA  
GEORGE ALEALA  
Executive Director  
LIUNA

LABORERS' INTERNATIONAL UNION OF NORTH AMERICA  
LOCAL 368, AFL-CIO



October 26, 2000

VIA FACSIMILE 527-5733

The Honorable Duke Baimun, Chair of the Transportation Committee  
Honolulu City Council  
Honolulu Hale  
530 South King Street  
Honolulu, HI 96813

TESTIMONY IN SUPPORT OF Primary Corridor Transportation Project

Hearing Date: Thursday, October 26, 2000  
Time: 6:30 P.M.  
Hearing Location: Honolulu Hale - City Council Chamber

Transportation Chair Baimun and Distinguished Members of the Transportation Committee:

Thank you for allowing me the opportunity to appear before you today as you consider taking action on the Primary Corridor Transportation Project. On behalf of the Laborers' Union, and each of its members, I would like to seek your support in moving forward with the Bus Rapid Transit option currently being considered by the Committee.

Honolulu is currently in dire need of an improvement to the public transportation system given the number of hours people currently spend in traffic and the growing need for alternatives to the use of the automobile. Moreover, given the importance of our visitor industry, the ability to get to and from Waikiki, and beyond, as well as throughout the island during a visit, is vitally important to our ongoing mission to maintain Hawaii as premier international destination for travelers.

**TESTIMONY IN SUPPORT OF Primary Corridor Transportation Project**  
Page 2 of 2

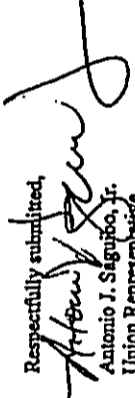
Additionally, the benefits of a modern Bus Rapid Transit System will be felt by the community at large both immediately, and for generations to come. As to the immediate benefits, the proposed projects could potentially create as many as 3000 new jobs in the construction industry alone. As always, work opportunity creates tax revenue and greater spending, which helps to benefit our economy overall.

As to the future benefits, most are obvious, but worth repeating. Future generations will have meaningful and viable options to choose from when deciding how they commute to and from work. Also, an improved public transportation system would bring about greater access to the outlying communities, particularly Kapolei, which will expedite the growth of Oahu's Second City.

The time to take action on bringing about a new and improved Bus Rapid Transit system is now. One need only try to commute to or from work during peak traffic times and they will realize that improvement is needed. You have before you today a realistic, environmentally friendly, and fiscally responsible option that seeks to address a fundamental community concern. I urge you to move forward on making the new Bus Rapid Transit System a reality for all the benefits it offers to our community.

Thank you for allowing me the opportunity to testify. I would be happy to answer any question that the Committee may have.

Respectfully submitted,

  
Antonio J. Saguboo, Jr.  
Union Representative

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
660 SOUTH KING STREET, 9th FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 523-4329 • Fax: (808) 523-4730 • Email: www.co.honolulu.hi.us



JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE KEOKI 'MIAUJOTO  
DEPUTY DIRECTOR

TPD10/00-04992R

November 13, 2002

Mr. Benjamin Saguboo  
Business Manager  
Laborer's International Union of North America  
Local 368, AFL-CIO  
1617 Palama Street  
Honolulu, Hawaii 96817

Dear Mr. Saguboo:

Subject: Primary Corridor Transportation Project

This is in response to your letters submitted October 5, 12, and 26, 2000 regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. On behalf of the Laborers' Union, and each of its members, I would like to seek your support in moving forward with the Bus Rapid Transit option currently being considered by the Committee.

Response: Comment noted. It states the commenter's preference for an LPA.

2. Additionally, the benefits of a modern Bus Rapid Transit System will be felt by the community at large both immediately, and for generations to come. As to the immediate benefits, the proposed projects could potentially create as many as 3000 new jobs in the construction industry alone.

Response: Comment noted. The project agrees with this statement.

3. As always, work opportunity creates tax revenue and greater spending, which helps to benefit our economy overall.

Response: Comment noted. The project agrees with this statement.

4. As to the future benefits, most are obvious, but worth repeating. Future generations will have meaningful and viable options to choose from when deciding how they commute to and from work.

Response: Comment noted. The project agrees with this statement.

Mr. Benjamin Saguboo  
Page 2  
November 13, 2002

5. Also, an improved public transportation system would bring about greater access to the outlying communities, particularly Kapolei, which will expedite the growth of Oahu's Second City.

**RESPONSE:** Comment noted. The project agrees with this statement.

We appreciate your interest in the project.

October 12, 2000

Ms. Cheryl Soon, Director  
Department of Transportation Services  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, HI 96813

Dear Ms. Soon

**RE: DEIS: PRIMARY CORRIDOR PROJECT**

I am Dan Davidson, Executive Director of the Land Use Research Foundation (LURF) of Hawaii, offering this testimony in support of the Bus Rapid Transit Alternative as the preferred alternative for improving mobility in Honolulu. We have analyzed the "No-Build" and "Transportation System Management" (TSM) alternatives as well and believe that the Bus Rapid Transit plan offers the best results. This is especially true in view of the fact that Bus Rapid Transit includes all of the elements of the TSM plan. LURF represents many leeward Oahu developers so the new "hub and spoke" bus system is important to us.

Regarding the process leading to the selection of the preferred alternative, the Trans2K program was one of the best community-based planning processes that I have seen in Honolulu. Every community had an opportunity to participate in shaping its transportation options.

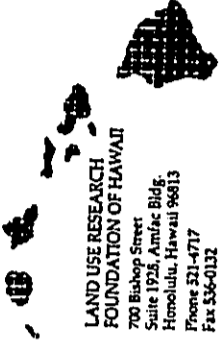
While we fully support the Bus Rapid Transit plan, LURF also believes that it is critically important to fund leeward Oahu highway projects, both City and State, that will be needed to accommodate the planned growth of the City of Kapolei and other important residential, resort, and commercial projects in the region. We believe the funding of Bus Rapid Transit and the Ewa Regional Highway Master Plan needs to be well coordinated.

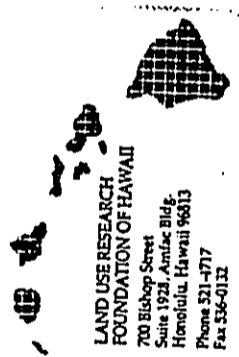
Thank you for this opportunity to express our views.

Sincerely,



CHERYL D. SOON  
Director





LAND USE RESEARCH  
FOUNDATION OF HAWAII  
700 Bishop Street  
Suite 1921, Amfac Bldg.  
Honolulu, Hawaii 96813  
Phone 521-4777  
Fax 336-0132

November 14, 2000

Duke Bainum, Chair  
and Committee Members  
Committee on Transportation  
Honolulu Hale  
530 South King Street  
Honolulu, HI 96813

Dear Chair Bainum and Committee Members:

**RE: RESOLUTION 00-249: SELECTION OF A LOCALLY PREFERRED ALTERNATIVE FOR THE PRIMARY CORRIDOR TRANSPORTATION PROJECT**

I am Dan Davidson, Executive Director of the Land Use Research Foundation (LURF) of Hawaii, offering this testimony in support of Resolution 00-249 regarding the selection of the Bus Rapid Transit Alternative as the locally preferred alternative for the City's primary corridor transportation project. In our opinion, Bus Rapid Transit does the most to improve mobility and improve future transportation options for Oahu, and believe that the Bus Rapid Transit plan offers the best results for the money. This is especially true in view of the fact that Bus Rapid Transit includes all of the elements of the TSM plan. LURF represents many leeward Oahu developers so the new "hub and spoke" bus system is important to us.

Regarding the process leading to the selection of the preferred alternative, the TransZK program was one of the best community-based planning processes that I have seen in Honolulu. Every community had an opportunity to participate in shaping its transportation options.

While we fully support the Bus Rapid Transit plan, LURF also believes that it is critically important for both the City and State to fund leeward Oahu highway projects that will be needed to accommodate the planned growth of the City of Kapolei and other important residential, resort, and commercial projects in the region. We believe the funding and construction of Bus Rapid Transit and these leeward highway improvements needs to be well coordinated. We believe this important concept is supported in the City's DEIS for this project.

Thank you for this opportunity to express our views.

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
630 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 523-4520 • Fax: (808) 523-1750 • Internet: www.cdot.honolulu.Hi.us



JEREMY HARRIS  
LAWER

CHERYL D. SOOHI  
DIRECTOR

GEORGE WEDOU - UYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

Mr. Dan Davidson, Executive Director  
Land Use Research Foundation of Hawaii  
700 Bishop Street, Suite 1923  
Amfac Building  
Honolulu, Hawaii 96813

Dear Mr. Davidson:

Subject: Primary Corridor Transportation Project

This is in response to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your oral testimony at the September 25, 2000 Special Transportation Committee Meeting, your oral testimony at the formal Public Hearing, October 12, 2000 letter, November 14, 2000 letter, and your oral testimony at the November 14, 2000 Special Transportation Committee Meeting regarding the MIS/DEIS. Part B responds to your oral testimony at the April 20, 2002 public hearing regarding the SDEIS.

Part A - MIS/DEIS Comments

1. I'm Dan Davidson of LURF testifying tonight in support of the Bus Rapid Transit alternative. I'd like to make two points. One, the process was, I think, extraordinary for a planning process. It's kind of ironic that the better the process is before it gets to you the sort of quieter it is and you're probably pretty happy about that. The second thing is that I think it's important to come up with a real world buildable, affordable plan.

Response: Comment noted. It states the commenter's preference for an LPA.

2. I do echo Henry Eng's comment that we do think that both this plan and the Ewa Regional Highway Plan are very important and we'll be looking especially to the OMPO Policy Committee to work its magic to figure out how to fund both of those.

Response: The Oahu Regional Transportation Plan Update (TOP 2025) includes both the BRT project and highway improvements in the Ewa / Kapolei area. TOP 2025 is required to be financially constrained to expected federal funding.

3. I'm offering this testimony in support of the Bus Rapid Transit Alternative as the preferred alternative for improving mobility in Honolulu. We've analyzed the No-Build and the TSM alternatives as well and believe that the Bus Rapid Transit plan offers the best results. This is especially true in view of the fact that Bus Rapid Transit includes all of the elements of the TSM plan.

Mr. Dan Davidson  
Page 2  
November 13, 2002

Response: Comment noted. It states the commenter's preference for an LPA.

4. Regarding the process leading to the selection of the preferred alternative, the Trans2K program was one of the best community-based planning processes that I have seen in Honolulu. Every community had an opportunity to participate in shaping its transportation options.

Response: Comment noted. It is a statement of opinion.

5. While we fully support the Bus Rapid Transit plan, we also believe that it is critically important to fund leeward Oahu highway projects, both City and State, that will be needed to accommodate the planned growth of the City of Kapolei and other important residential, resort and commercial projects in the region. We believe that the funding of the Bus Rapid Transit plan and the Ewa Regional Highway Master plan needs to be carefully coordinated.

Response: DTS agrees with this statement. See response to comment #2.

6. Let me also add that another organization which I'm involved, LOTMA, Leeward Oahu Transportation Management Association, also is in support of the Bus Rapid Transit plan and will be submitting comments prior to the end of your comment period.

Response: Comment noted. It states the commenter's preference for an LPA.

#### Part B - SDEIS Comments

7. I'm speaking in support of the BRT system. My group, the Land Use Research Foundation, is a landowner/developer group comprised of major Hawaii landowners and developers all over the state, with an emphasis in Ewa and Central Oahu. Our groups is very much in support of this program, because it will create transportation options, transportation choices, and ability for increased mobility. That is critical for landowners and developers.

Response: Comment noted.

8. I want to just make a couple of points about - first about the process. I said, a couple of years ago at the City Council, when I chose BRT as the locally preferred alternative, that the Trans 2K process was about the best community grass roots process I'd ever seen. And I stand by that comment. All over the islands, people got to work on transportation solutions, transportation options, not in the public hearing format, but actually in a working format. You can't do any better than that. And I salute the City for the process it chose to employ.

Response: Thank you for supporting our community involvement process which will continue throughout the project.

9. The other major comment I'd like to make - and this will show my eye a little bit - is that I was around in 1980 when Mayor Anderson killed heavy rail. I was around in '92 when the Council killed light rail. And in both instances, a lot of people showed up and said, "Gee whiz. We've got to study it some more." We can't afford strike three, with a lot of people saying, "Gee, let's study BRT some more. Let's lose the federal funding for the third time. And maybe we'll come up with some bright new ideas." This is an excellent start, and it should be pursued.

Response: Comment noted. It is a statement of preference for the Refined LPA.

Mr. Dan Davidson  
Page 3  
November 13, 2002

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Fatin Miyamoto at 527-8976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director



**THE LEAGUE  
OF WOMEN VOTERS OF HONOLULU**  
49 SOUTH HOTEL STREET, ROOM 319 HONOLULU, HAWAII 96813 PH: (808) 531-7448

November 6, 2000

Ms. Cheryl Soon, Director  
Department of Transportation Services  
Honolulu, HI 96813

Dear Ms. Soon:

Re: Major Investment Study/Draft Environmental Impact Statement of the  
Primary Corridor Transportation Project

The League of Women Voters of Honolulu welcomes the opportunity to comment on this DEIS. We would like to commend the Department of Transportation Services on its public outreach program for the proposed transportation plan. We especially appreciate your meeting with us to discuss the issues.

We think that the Bus Rapid Transit Plan is a well-thought-out solution to Honolulu's future transportation problems which will give people a viable alternative to automobiles. However, it is the League's opinion that the people of Honolulu need considerably more time to understand the impacts of in-town dedicated bus lanes before this concept is implemented. We think people need to be exposed to this concept, and discuss it thoroughly before they can perhaps embrace it. Even though you did have an excellent outreach program, the vast majority of the public is probably unaware of the City's intention to implement dedicated bus lanes in 2001.

For the near future, the League believes that the Transportation System Management alternative, the hub-and-spoke bus network, should be fully implemented with its highway improvements. Since the Pearlridge and Middle Street and other transit centers have not yet been built, we feel that the system should be completed and given a reasonable operational period to be evaluated.

We would like to see a Development Plan for the Primary Urban Center (PUC) in place before construction of center-lane transit stops and dedicated bus lanes. Exploration and discussion of the BRT concept in the context of completing the PUC Development Plan would seem to be appropriate. We would expect that the many PUC Neighborhood Boards that have expressed concern about the intensive development in the August 1999 draft PUC Development Plan would also support this idea. The adoption of a new Development Plan should precede the construction of transit stations and other facilities in the in-town area of the PUC.

The League is heartened by the City's commitment to an enhanced bus system and looks forward to continuing discussions with you on proposals to expand and improve it.

Sincerely,

*Pearl Johnson*  
Pearl Johnson, President  
League of Women Voters of Honolulu



**THE LEAGUE  
OF WOMEN VOTERS OF HONOLULU**  
49 SOUTH HOTEL STREET, ROOM 319 HONOLULU, HAWAII 96813 PH: (808) 531-7448

May 7, 2002

Ms. Cheryl Soon, Director  
Department of Transportation Services  
Honolulu, HI 96813

Dear Ms. Soon:

Re: Supplemental Draft Environmental Impact Statement for the Primary Corridor  
Transportation Project

The League of Women Voters of Honolulu welcomes the opportunity to comment on this SDEIS. We would like to commend the Department of Transportation Services on its public outreach program for the proposed transportation plan. We especially appreciate your meeting with us to discuss the issues.

The League did not come to an agreement on the complete Bus Rapid Transit Plan. However, we did agree that the first segment from Iwilei to Waikiki should be implemented and carefully evaluated before proceeding with subsequent portions of the plan.

As we have stated in previous letters, we would like to see a Development Plan for the Primary Urban Center (PUC) in place before construction of center-lane transit stops and dedicated bus lanes. Exploration and discussion of the BRT concept in the context of completing the PUC Development Plan would seem to be appropriate. The adoption of a new Development Plan should precede the construction of transit stations and other facilities in the in-town area of the PUC.

The League supports the City's commitment to an enhanced bus system and looks forward to continuing discussions with you on proposals to expand and improve it.

Sincerely,

*Pearl Johnson*  
Pearl Johnson, President  
League of Women Voters of Honolulu

MAY - 7 2002

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
600 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 523-4530 • Fax: (808) 523-4700 • Internet: www.cc.honolulu.hi.us

JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE "KEOKI" MIYAMOTO  
DEPUTY DIRECTOR

TPD11/00-05371R  
TPD15/02-01823R

November 13, 2002

Ms. Pearl Johnson, President  
League of Women Voters of Honolulu  
49 South Hotel Street, Room 314  
Honolulu, Hawaii 96813

Dear Ms. Johnson:

Subject: Primary Corridor Transportation Project

This is in response to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your November 6, 2000 letter regarding the MIS/DEIS. Part B responds to your May 7, 2002 letter regarding the SDEIS.

Part A - MIS/DEIS Comments

1. We would like to commend the Department of Transportation Services on its public outreach program for the proposed transportation plan. We especially appreciate your meeting with us to discuss the issues.

Response: Thank you for your acknowledgments.

2. We think that the Bus Rapid Transit Plan is a well-thought-out solution to Honolulu's future transportation problems that will give people a viable alternative to automobiles.

Response: Comment noted. It is a statement of opinion.

3. However, it is the League's opinion that the people of Honolulu need considerably more time to understand the impacts of in-town dedicated bus lanes before this concept is implemented. We think people need to be exposed to this concept, and discuss it thoroughly before they can perhaps embrace it. Even though you did have an excellent program, the vast majority of the public is probably unaware of the City's intention to implement dedicated bus lanes in 2001.

Response: On November 29, 2000, the City Council adopted a resolution identifying the Bus Rapid Transit (BRT) Alternative as the Locally Preferred Alternative (LPA). At that time the Council directed DTS to continue the public involvement commitment during the Primary Corridor Transportation Project Preliminary Engineering/Final Environmental Impact Statement (PE/FEIS) phase. Community working groups were established by geographical areas (Pearl City/Aiea, Kalihi, Downtown/Kakaako, Mid-Town/University, and Walkiiki) to provide input and feedback on the proposed BRT project to the technical staff, while simultaneously providing a greater in-depth understanding about BRT and what it means for the community. The working group format

Ms. Pearl Johnson  
Page 2  
November 13, 2002

enabled community representatives to discuss specific issues and potential design solutions directly with the project's transportation and environmental planners. Working group members exchanged information on community needs and technical details of the BRT schemes. The project team then carried out additional studies and developed project refinements as a result of working group discussions.

In addition, the Oahu Trans 2K public workshops continue being held to inform the public about the project refinements identified through the Working Group meetings. Also, to keep the public informed since the adoption of the LPA two Progress Reports (newsletters) were published and distributed to over 10,000 recipients.

Even after the NEPA process has concluded and the Record of Decision (ROD) has been issued, public involvement will continue in many areas, such as planning, design and construction of transit centers, transit stops, joint development, streetscapes, landscaping, street tree master plan, station location and design studies, aesthetic design of vehicles, ITS and particulars of the ticketing system.

4. For the near future the League believes that the Transportation System Management alternative, the hub-and-spoke bus network, should be fully implemented with its highway improvements.

Response: Comment noted. It states the commenter's preference for a LPA.

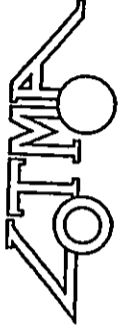
5. We would like to see a Development Plan for the Primary Urban Center (PUC) in place before construction of center-lane transit stops and dedicated bus lanes. Exploration and discussion of the BRT concept in the context of completing the PUC Development Plan would seem to be appropriate. We would expect that the many PUC Neighborhood Boards that have expressed concern about the intensive development in the August 1999 draft PUC Development Plan would also support this idea. The adoption of a new Development Plan should precede the construction of transit stations and other facilities in the in-town area of the PUC.

Response: There is no indication of when the updated Primary Urban Center Development Plan (PUC DP) will be adopted by the City Council. The environmental review process of the Primary Corridor Transportation Project (PCTP) cannot be delayed pending this outcome. The In-Town BRT has been designed to support current land uses and future land use patterns, particularly in vacant and underutilized parcels in Kakaako, Iwalei, and near Ala Moana Center and the Convention Center. These are the locations where development is likely to occur with or without the PCTP. Because of this, the Refined LPA has been evaluated in the FEIS as being consistent with the Public Review Draft of the PUC DP (May 2002), as well as the current PUC DP adopted in 1990.

6. The League of Women Voters of Honolulu welcomes the opportunity to comment on this SDEIS. We would like to commend the Department of Transportation Services on its public outreach program for the proposed transportation plan. We especially appreciate your meeting with us to discuss the issues.

Response: Thank you for reviewing the SDEIS. We appreciate your interest in the project and are glad to meet with you anytime.





Leeward Oahu Transportation Management Association

Ms. Pearl Johnson  
Page 3  
November 13, 2002

7. *The League did not come to an agreement on the complete Bus Rapid Transit Plan. However, we did agree that the first segment from Inaia to Waikiki should be implemented and carefully evaluated before proceeding with subsequent portions of the Plan.*

**Response:** We appreciate your support of the initial section of the BRT being constructed from Inaia to Waikiki.

8. *As we have stated in previous letters, we would like to see a Development Plan for the Primary Urban Center (PUC) in place before construction of center-line transit stops and dedicated bus lanes. Exploration and discussion of the BRT concept in the context of completing the PUC Development Plan would seem to be appropriate. The adoption of a new Development Plan should precede the construction of transit stations and other facilities in the in-town area of the PUC.*

**Response:** See response to comment #5.

9. *The League supports the City's commitment to an enhanced bus system and looks forward to continuing discussions with you on proposals to expand and improve it.*

**Response:** Thank you for your support.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6876. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

October 16, 2000

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, HI 96813

Dear *Ms. Cheryl*

DEIS Primary Corridor Transportation Project

LOTMA has previously commented on this project and received your consideration (August 16, 2000) of our comments.

We support the BRT alternative, as a preferred option, which offers a more comprehensive approach to enhancing mobility to and from the Leeward area.

At the same time, we believe full consideration must also be given to funding Leeward Oahu road improvement projects presently included in the Ewa Highway Transportation Master Plan. It is our view that both the BRT and the elements of that plan are needed in a coordinated fashion in order to best serve the total transportation needs of the public.

Thank you for your consideration of our views.

Very truly yours,

Henry Eng, DCP  
Vice President, President-Elect

ma-01002000X19869



**Leeward Oahu Transportation Management Association**

November 9, 2000

The Honorable Duke Baiman, Chair  
and Members of the Transportation Committee  
City Council  
City and County of Honolulu  
530 S. King Street  
Honolulu, HI 96813

Dear Chair Baiman and Committee Members:

Resolution 00-249, Selection of a Locally Preferred Alternative for the Primary Corridor Transportation Project

I am Henry Eng, Vice President/President-Elect of LOTMA. LOTMA is an organization comprised of Leeward/Central area developers, including the city and state. LOTMA is committed to improving mobility in the region and facilitating the development and use of alternative transportation opportunities that would maximize the use of existing and proposed transportation systems in the Leeward/Central areas. We have previously commented on this project and received consideration (August 16, 2000) of our comments from the city transportation director.

We support the BRT alternative as a preferred option. It offers a more comprehensive approach to enhancing mobility to and from the Leeward area. This option offers a reasonable cost-effective approach to meeting transportation needs for a growing area.

At the same time, we believe full consideration should be given to funding Leeward Oahu road improvement projects presently included in the Ewa Highway Transportation Master Plan. It is our view that both the BRT and the elements of the Ewa plan are needed in a coordinated fashion in order to best serve the regional transportation needs of the public.

Thank you for your consideration of our views.

Very truly yours,

*Henry Eng, AICP*  
Henry Eng, AICP  
Vice President/President-Elect

esa-0102000019872

94-229 Waipahu Depot Road, #407 • Waipahu, Hawaii 96797  
Telephone Number (808) 677-8100 • Facsimile Number (808) 676-4741

DEPARTMENT OF TRANSPORTATION SERVICES

**CITY AND COUNTY OF HONOLULU**

650 SOUTH KING STREET, 3RD FLOOR  
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JEREMY WARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE KEONG MIYAMOTO  
DEPUTY DIRECTOR

TPD1000-05138R

November 13, 2002

Mr. Henry Eng, AICP  
Vice President, President-Elect  
Leeward Oahu Transportation Management Association  
Honolulu Building  
94-229 Waipahu Depot Road, Suite 407  
Waipahu, Hawaii 96787

Dear Mr. Eng:

Subject: Primary Corridor Transportation Project

This is in response to your October 16 and November 9, 2000 letters and your oral testimony at the November 14, 2000 Special Transportation Committee Meeting regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. We support the BRT alternative, as a preferred option, which offers a more comprehensive approach to enhancing mobility to and from the Leeward area.

Response: Comment noted. It states the commenter's preference for an LPA.

2. At the same time, we believe full consideration must also be given to funding Leeward Oahu road improvement projects presently included in the Ewa Highway Transportation Master Plan. It is our view that both the BRT and the elements of that plan are needed in a coordinated fashion in order to best serve the total transportation needs of the public.

3. Response: Comment noted. DTS agrees with this statement.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

*Cheryl D. Soon*

CHERYL D. SOON  
Director

THE LIBERTARIAN PARTY OF HAWAII

625 Keawe St, Honolulu, HI 96813 (808) 537-307

Testimony on

The City and County of Honolulu Council Resolution 00-249

Title:  
RESOLUTION RELATING TO THE SUPPORT OF A FULLY INTEGRATED MASS TRANSIT SYSTEM  
AND TO THE SELECTION OF A LOCALLY PREFERRED ALTERNATIVE FOR THE PRIMARY  
CORRIDOR TRANSPORTATION

Please oppose Resolution 00-249

Under this resolution, Dillingham Street will become one of the worst traffic areas in the state. Two of the four lanes will be closed permanently, dedicated exclusively to the BRT aka the Bad Road Trip. We are also concerned about the city's proposal to close down the left hand turn lanes and run buses through the middle of street with BRT extended buses stopping on the route every two to four minutes and the plan to eliminate all the left turn accesses in the area. These BTR lanes will hit Honolulu drivers with a double whammy. Just think of the havoc that is caused when even one lane is closed due to a stalled auto. Unbelievable as it may sound the city plans on closing two lanes to all non BTR traffic on some of our most congested roads. As a further insult, the drivers and taxpayers of Hawaii will be footing the bill to have the city make our traffic problems worse, in the worst traffic areas. To compensate for the 50% reduction in lanes there would need to be a 50% reduction in the number of cars and trucks using just to break even. Even if this pipe dream came true there would be no net advantage. We certainly don't see private investors racing to fund this exercise in government waste. Allow the great people of Hawaii to choose their preferred mode of transport individually. Not until, "The Bus" turns profitable will it be time to expand public transport.

Traffic jams, are caused by the government not building enough roads. Solution, build more roads. Recommendation, build more roads. Advice, build more roads. Also, widen existing roads. Add a second deck of roads. Sections of the HI are jammed most of the time. Please fix.

Driving is a pleasure, without traffic jams. Less traffic jams benefit everyone in terms of safety, saved time, and fuel. In the saner society of the past, when a car stalled, the occupants, and the first motorists on the scene would work together to clear the lanes as quickly as possible. Nowadays, it seems the police cause traffic jams, and as shown by their inaction, have little regard for the stress traffic jams place on the public.

The proper course is to remove any legal or regulatory barriers which stand in the way of free and open competition in transportation. For example, to fill up unused passenger seats in privately owned cars why not legalize hitch hiking. Make it easy and legal for all drivers to accept passengers for hire at existing bus stops. Just think how efficient Hawaii transport would be with thousands of passengers building trust with thousands of drivers by the simple act of negotiating a reasonable fare.

Competition results in the most efficient use of resources, both capital and human, and results in the greatest prosperity for the people of Hawaii. There is a direct correlation between individual and economic freedom and prosperity. The great people of Hawaii deserve freedom and prosperity.

Thank you.

Roger Taylor, Chairman, Libertarian Party of Hawaii

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE 'KEOKI' MIVAMOTO  
DEPUTY DIRECTOR

November 13, 2002

Mr. Roger Taylor  
Chairman  
Libertarian Party of Hawaii  
625 Keawe St.  
Honolulu, Hawaii 96813

Dear Mr. Taylor:

Subject: Primary Corridor Transportation Project

This is in response to your oral and written testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. I'm Roger Taylor, chairman of the Libertarian Party of Hawaii. We oppose BRT.

Response: We appreciate you attending the public hearing and expressing your views regarding the proposed project.

2. Under this resolution, Dillingham Street would become one of the worst traffic areas in the state. Two of the four lanes would be permanently closed, dedicated exclusively to the BRT, which one of our members nicknamed Bad Road Trip.

Response: As documented in Chapter 4 of the FEIS, there will be enough people diverted out of the cars onto public transit for Dillingham Boulevard to operate effectively with one general purpose lane in each direction, plus turn lanes at major intersections. Along half of the route, the general purpose lanes will be extra wide so that stopped and right-turning vehicles will not hold up traffic behind it. Along the other half, bus turnouts will be installed so that stopped buses do not block traffic.

Because of the diversion of people from autos to transit, even with the BRT lanes, the traffic LOS along Dillingham Boulevard will be equal to or better than conditions with the No-Build Alternative. Additionally, traffic LOS on parallel streets such as N. King Street and Nimitz Highway will be equal to or in most cases better with the BRT lanes on Dillingham Boulevard than without them.

Moreover, the exclusive BRT lanes on Dillingham Boulevard will enable Dillingham Boulevard to carry 3 times the number of people that it can carry today.

3. We are also concerned about the City's proposal to close down the left-hand turn lanes and run buses through the middle of the street, with BRT extended buses stopping on the route every two to four minutes, and plan to eliminate all the left turn access to the area.

Response: Left-turns will be retained at 9 of the 10 locations where they exist today.

4. *The BRT lanes would hit Honolulu drivers with a double whammy. Just think of the havoc that is caused when even one lane is closed due to a stalled auto. Unbelievable as it may sound, the City plans on closing two lanes to all non-BRT traffic on some of our most congested roads.*

Response: See response to comment # 2.

5. *As a further result, the drivers and taxpayers of Hawaii will be footing the bill to have the City make our traffic problems worse in the worst traffic areas.*

Response: See response to comment # 2.

6. *To compensate for the 50 percent reduction in lanes, there would need to be a 50 percent reduction in car, bus and truck usage just to break even.*

Response: As shown in Chapter 4 of the FEIS there will be a sufficient number of people diverted out of their cars to offset the conversion of lanes on Dillingham Boulevard.

7. *You certainly don't see private investors racing to fund this exercise in government waste.*

Response: Transit systems throughout the nation are subsidized. The reasons for doing so include the recognition that many members of the community are either too young, too old, too poor, or are physically unable to drive a car, and are therefore dependent on public transportation for their mobility. Additionally, it is viewed as more cost effective to spend public funds subsidizing transit than on building new or widened roads to accommodate these same people in automobiles.

8. *Allow the great people of Hawaii to choose a preferred mode of transportation individually.*

Response: The Honolulu residents will have individual choice in determining whether or not to use TheBus, BRT, walk, bicycle, or drive a car.

9. *Not until TheBus turns profitable will it be time to expand public transportation.*

Response: The reason that the City took over the bus system is that the private sector could no longer make a profit running it and were in the process of abandoning all but the profitable routes. Since a significant segment of the population is dependent on transit for their mobility, the City with the public's support stepped in to ensure that these people would not be left immobile.

There is a role for the private sector in the Refined LPA, which is to provide contracted out circulator services.

10. *The proper course to take is to remove any legal or regulatory barriers which stand in the way of free and open competition in transportation. What comes to mind would be privately-operated radio-dispatched van systems to take people door to door. Competition results in the most efficient use of resources, both capital and human, and results in the greatest prosperity for the people of Hawaii. There's a direct correlation between individual and economic freedom and prosperity. The great people of Hawaii deserve freedom and prosperity.*

Response: There are no legal or regulatory barriers to operating radio-dispatched vans, if someone in the private sector wanted to do it.

11. *Please oppose Resolution 00-249. Under this resolution, Dillingham Street will become one of the worst traffic areas in the state. Two of the four lanes will be closed permanently, dedicated exclusively to the BRT aka the Bad Road Trip.*

Response: See response to comment #2.

12. *We are also concerned about the city's proposal to close down the left hand turn lanes and run buses through the middle of street with BRT extended buses stopping on the route every two to four minutes and the plan to eliminate all of the left turn accesses in this area.*

Response: Left and U-turns will be permitted at most intersections on Dillingham Boulevard so that access to properties will not be an issue. These turns will be made on a separate green arrow, at which time the BRT will be given a red light.

13. *These BTR lanes will hit Honolulu drivers with a double whammy. Just think of the havoc that is caused when even one lane is closed due to a stalled auto. Unbelievable as it may sound the city plans on closing two lanes to all non BTR traffic on some of our most congested roads.*

Response: See response to comment # 2.

14. *As a further insult, the drivers and taxpayers of Hawaii will be footing the bill to have the city make our traffic problems worse, in the worst traffic areas.*

Response: See response to comment # 2.

15. *To compensate for the 50% reduction in lanes there would need to be a 50% reduction in car, bus and truck usage just to break even. Even if this pipe dream came true there would be no net advantage.*

Response: See response to comment # 2.

16. *You certainly don't see private investors racing to fund this exercise in government waste.*

Response: Comment noted.

17. *Allow the great people of Hawaii to choose their preferred mode of transport individually.*

Response: The BRT will give residents another mode of transportation from which to choose.

18. *Not until TheBus turns profitable will it be time to expand public transport.*

Response: Comment noted. It is a statement of opinion.

19. *Traffic jams, are caused by the government not building enough roads. Solution, build more roads. Recommendation, build more roads. Advice, build more roads. Also, widen existing roads. Add a second deck of roads. Sections of H1 are jammed most of the time. Please fix.*

Response: The OMPO regional transportation plan calls for the widening and construction of new roads in selected areas.

# LIFE OF THE LAND



*Ma Mau Ke Ea O Ka Aina I Ka Pono*  
Hawaii's own local Community Action Group  
Protecting our Fragile Natural & Cultural Resources  
through Research, Education, Advocacy & Litigation

Mr. Roger Taylor  
Page 4  
November 13, 2002

20. *Driving is a pleasure, without traffic jams. Less traffic jams benefit everyone in terms of safety, saved time, and fuel. In the same society of the past when a car stalled, the occupants, and the first motorists on the scene, would work together to clear the lanes as quickly as possible. Nowadays, it seems the police cause traffic jams, and as shown by their reaction, have little regard for the stress traffic jams place on the public.*

**Response:** Comment noted. It is a statement of perception regarding the traffic conditions.

21. *The proper course is to remove any legal or regulatory barriers which stand in the way of free and open competition in transportation. For example, to fill up unused passenger seats in privately owned cars why not legalize hitch hiking. Make it easy and legal for all drivers to accept passengers for hire at existing bus stops. Just think how efficient Hawaii transport would be with thousands of passengers building trust with thousands of drivers by the simple act of negotiating a reasonable fare.*

**Response:** Comment noted. It is beyond the scope of the project to determine the legalities associated with hitch hiking and private vehicles accepting passengers for hire.

22. *Competition results in the most efficient use of resources, both capital and human, and results in the greatest prosperity for the people of Hawaii. There is a direct correlation between individual and economic freedom and prosperity. The great people of Hawaii deserve freedom and prosperity.*

**Response:** Comment noted. The Primary Corridor Transportation Project does not affect freedom and prosperity.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

City and County of Honolulu  
Dept. of Transportation Services  
711 Kapiolani Blvd., Suite 1200  
Honolulu, HI 96813

Office of Environmental Quality Control  
235 South Beretania, Suite 702  
Honolulu, HI 96813

Parsons Brinkerhoff Quade & Douglas, Inc.  
Pacific Tower, Suite 3000  
1001 Bishop St.  
Honolulu, HI 96813

re: Primary Corridor Transportation Project

The cost of auto dependency is measured not only in dollars and cents, but also in human suffering. Between 1987 and 1997 alone, more than 1,500 people were killed in automobile accidents on Hawaii's roads and highways. Over 140,000 more were injured. Auto emissions are a major cause of global warming and gasoline is a source of soil contamination.

Over-dependence on automobiles discriminates against those who cannot drive, either because of age (many are too young or too old to drive) or disability. Programs for safe communities, anti-road rage, and traffic calming are needed to mitigate these unintended negative consequences of the automobile.

On Oahu, as in the rest of the United States, there is a growing recognition that the real, long-term costs of over-dependence on the automobile are simply too high. To reduce these costs, more choices of public transit need to be available for more people. The key question is, what investments are needed to make public transit a practical option in a balanced transportation system?

The obvious answer is mass transit. .... Then there is the Draft EIS for the PCTP.

The BRT Alternative states that the number of people will rise by 200,000 over 20 years; the number of trips to within downtown will rise by 300,000; one mile of loading zones will be removed from downtown; hundreds of parking places will be removed from downtown; and lanes will be dedicated to non-automobiles. The result:

*"The BRT Alternative would not necessarily improve automobile movements through congested intersections."*

How come all possible negative impacts are so sugar-coated? It does not take a rocket scientist to note that loss of lanes, loss of left-hand turn lanes, loss of parking and loading zones, and increased use of cars most certainly will have an impact on the movement of cars!

No-Build Alternative. The TSM Alternative would save about 8,600 barrels of oil per year compared to the No-Build." (S-13)

Q12. Does the statement "The City's land use policy for the primary transportation project requires that transportation and land use be planned" take into account the different carrying capacity of the city - dependent upon the transportation system adopted?

Q13. If the BRT Alternative allows faster development, isn't it possible that the total use of oil will rise, even if per capita use of oil falls?

Q14. Which poses more impacts on endangered and threatened wildlife: average per capita pollution or total pollution?

"The No-Build Alternative would not entail any relocations. The number of relocations associated with the TSM and BRT Alternatives depends on which sites are selected for the Iwilei and Middle Street transit centers. ... Since federal funds would be used to assist project construction, the project would be subject to provisions of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (49 CFR, Part 24, 42 U.S.C. 4601, et seq.). State law on relocations is provided in Hawaii Revised Statutes (HRS) Chapter 111, Assistance of Displaced Persons." (S-15) "Access to docks, terminals and other water-related facilities would be maintained through close coordination with all public agencies having harbor-related responsibilities." (S-17) "An archeological contingency procedure would be developed in the unlikely event that unanticipated resources are encountered during construction." (S-17)

Q15. "Unanticipated Resources" means what?

Q16. What is an "archeological contingency procedure"?

"None of the alternatives would cause a disproportionately high adverse health or environmental effect on any population group, including minority and low-income populations. Benefits to these groups would be substantial." (ES-21.22) "The quality of life for Oahu's residents and visitors will continue to decrease unless the transportation system in the primary transportation corridor is modified to better accommodate existing and future travel necessary for daily life." (1-1)

Q17. As we are currently pulling ourselves out of a nine year recession, "Is our quality of life decreasing right now?"

Q18. "The purpose of the Primary Corridor Transportation Project is to examine candidate investments that would improve the efficiency of both the transportation system in the primary transportation corridor, and the connections between the corridor and the rest of the island." (1-1) What is meant by "candidate investments", donations by politicians?

Q19. "The City's land use policy for the primary transportation corridor requires that transportation and land use be planned and developed together to implement a comprehensive urban growth strategy." (1-5) How does maui-makai transit mesh with "A high capacity (east-west) transit spine through the PUC would enhance in-town mobility" "A high capacity transit spine through the PUC would enhance in-town mobility and provide transit connections between the many travel markets that exist within the Urban Core." (1-6)

"The state and City have a development policy encouraging growth in only two areas: the PUC and Ewa." (1-7)

Reading the Draft EIS, one gets the initial feeling that transportation impacts are minimal, if they exist at all!

Anything controversial was either relegated to the Appendix (location of substations) or omitted. Why was the location of 22 electrical substations relegated to Appendix B which was not made publicly available, except by request? Because, including it in the main section would raise questions: Why exclude the location of site-specific structures in the main text (volume 1). Because some Neighborhood Boards have expressed concerns. Discussion omitted. However, a more careful reading of this DEIS leaves us with the impression that the writers are trying to cover something up! An EIS is by definition, a planning document, that reasonable and fairly evaluates alternatives. This EIS is designed to promote one alternative, and to avoid a realistic appraisal of impacts and mitigations.

"The City's land use policy for the primary transportation project requires that transportation and land use be planned and developed together to implement a comprehensive urban growth strategy." (page S-3)

Q1. With regard to the statement on page S-3 ("The City's land use policy for the primary transportation project requires that transportation and land use be planned and developed together to implement a comprehensive urban growth strategy"), how will planning them together but analyzing their impacts separately lead to sound planning?

Q2. "The Draft PUC Development Plan update calls for the PUC to capture 36 to 43 percent of Oahu's growth over the next 25 years." (S-4) With regard to the statement on page S-4 as stated above, isn't the Draft PUC Development Plan advisory only, with lots of shoulds instead of musts?

Q3. Doesn't the Draft PUC Development Plan leave lots of room for anything to be built?

Q4. "The TSM Alternative ... Where possible, existing bike lanes would be replaced by joint use bicycle/transit lanes." (S-12). With regard to the statement on page S-12 as stated above, will replacing existing bike lanes with multi-use bike lanes be safer or more dangerous for bicycle riders?

Q5. With regard to the statement on page S-12 as stated above, what is the safety of bicycles in the case of multi-use bike lanes based on?

Q6. With regard to the statement on page S-12 as stated above, for similar routes and times, which lane is more popular in terms of actual bicycle use, single purpose or multiple purpose lanes?

Q7. With regard to the statement on page S-12 as stated above, for similar routes and times, which lane is more dangerous in terms of actual bicycle use, single purpose or multiple purpose lanes?

Q8. With regard to the statement on page S-12 as stated above, what types of lanes cause the most bicycle accidents?

Q9. With regard to the statement on page S-12 as stated above, what types of lanes cause the most deadly bike accidents?

"The transit components of the BRT Alternative are compatible with land use plans and policies at the City and State levels—including goals of focusing growth within the Primary Urban Center and Kapolei." (S-13)

Q10. Are sound barriers along state roads within the purview of the county? "Other project structures, such as sound barriers along H-1 Freeway, would be sensitively designed within the context of their surroundings." (S-13)

Q11. Doesn't this assume the same growth rate regardless of the type of bus/rapid transit system built? "Reduced auto usage under the BRT Alternative would save about 39,000 barrels of oil each year in comparison to the

Q20. According to figures in this document, the expected growth rate would be: PUC=45%; Ewa=30%; Other=30%. If 3 out of 10 new residents will live outside of the PUC and Ewa, why do you say "encouraging growth in only two areas"? Table 1.2-1 Projected Population Summary and paragraph Waikiki 2,100 \* Other PUC 86,800 \* Ewa 59,800 \* Central Oahu 34,391 \* Other 25,909 \* Total 209,200

"More than 127,000 people are expected to be living in the Ewa area in 2025, a growth of 88 percent in 28 years. The PUC will also experience significant growth, increasing by about 89,000 people. The Central Oahu population is projected to increase from 130,544 in 1997 to 164,933 in 2025, a gain of 26 percent." (1-10) (3-29)

"The PUC DP introduces the concept of higher-density housing supported by extensive urban amenities." (1-10)

"Redevelopment in the PUC is designated primarily for the area marked of the H-1 Freeway between Middle Street and Kapahulu Avenue. A secondary growth/redevelopment area is located between Aiea and Pearl City. These areas have the most favorable conditions for accommodating new housing, and 90 to 95% of the expected growth in population by 2025 is expected to occur within these redevelopment areas." (1-11)

Table 1.2-8 Resident Person Trip Demand Within Selected Travel Markets	
	2025
Travel Market	1995
Within Urban Core	1,100,901
Suburban to Urban Core	498,685
Ewa/Kapolei to Urban Core	28,622
Suburban to Ewa/Kapolei	71,776
	179,983

NEPA regulations direct federal agencies preparing an EIS to engage in a public scoping process. The purpose of the process is to establish the scope of the EIS so that the document is responsive to public and agency concerns. Scoping is intended to identify potential issues early and ensure they are properly studied; avoid excessive attention to issues of little significance; produce a DEIS that is thorough and balanced; and avoid delays occasioned by an inadequate EIS." (1-26)

Q21. The best-fit alternatives, the choices that we are reviewing, were made without public review, right? "The alternatives described in this Chapter evolved over the course of developing the MIS/DEIS through an iterative process wherein a wide-range of options was progressively analyzed in increasing detail until it was winnowed down to the 'best fit' alternatives." (2-1)

Q22. Doesn't NEPA require all reasonable alternatives? Where did you get the term "best-fit alternatives"? Who's best-fit? How is the number of buses determined in each scenario? Don't cities tend to vary in their population/number-of-buses ratio? Wouldn't a lower ratio have a greater impact than a high ratio? Will the EIS be used to calculate the desired ratio? Will some planner, without public input, decide that number?

Q23. What is the relationship between "reasonable candidate investments" and "best-fit alternatives"?

Q24. What specific documents mention SISP? Please explain fully: "The concept of a direct connection between Keahi Interchange and Kakaako via Sand Island was developed to provide a more direct and scenic gateway entry to Waikiki and Kakaako for visitors and others from the Airport and points ewa. This is called the Sand Island Scenic Parkway, or SISP." (2-2)

Q25. How would the city do this? "Highway Alternative to the Regional Transit System. ... New express lanes for vehicles with 3 or more occupants would be constructed within the median of the H-1 Freeway in each direction between Kapolei and Managers Drive." (2-42)

Q26. Hasn't the State DOT found that P.M. zip lanes will not work? What has changed?

The A.M. zipper lane, the A.M. HOV/express lanes, and the P.M. HOV lanes currently in operation would be maintained." (2-42)

Q27. Are HOV's currently maintained?

Q28. Don't one out of three cars in the HOV contain only one person?

Q29. Isn't the limited enforcement precisely why so many disobey the law?

Q30. If all lanes were HOV, wouldn't the traffic pattern be identical? No enforcement? (This lack of enforcement excludes tickets given to accident victims, or cars crossing the yellow line by the airport where the zip lane merges with the other lanes).

"The City's land use policy for the primary transportation corridor requires that transportation and land use be planned and developed together to implement a comprehensive urban growth strategy." (1-5) "The purpose of the Primary Corridor Transportation Project is to examine candidate investments that would improve the efficiency of both the transportation system in the primary transportation corridor, and the connections between the corridor and the rest of the island." (1-1) "The project's purposes and needs are broader than satisfying the suburban to Downtown commuter travel market. The purposes include fostering desired land use development patterns, enhancing the quality of in-town living and in-town mobility, and facilitating the development of livable communities throughout the island, but more importantly, in the PUC. Therefore, given the project purposes and needs, it would not be sufficient for a new or enhanced highway to just accommodate travel demand between suburban areas and Downtown. The other purposes and needs of the project would remain unsatisfied. Therefore, the highway alternatives ... would not be sufficient." (2-45)

"The City's land use policy for the primary transportation corridor requires that transportation and land use be planned and developed together to implement a comprehensive urban growth strategy." (1-5) "Oahu Trans 2K revealed a clear community consensus that an important goal of any transportation program in the primary transportation corridor must be to foster livable communities." (2-46)

"The initial No-Build, Enhanced Bus/TSM, BRT and LRT alternatives were described in the project's EISPN and NOI. No responses were generated by the NOI. Some of the comments received in response to the EISPN pertained to alternatives. Comments on the alternatives from the agency and public scoping meeting duplicated the comments received in response to the EISPN." (2-46)

Q31. "EISPN Comments ... Why is an extension to Kahala not considered? (Outdoor Circle; Life of the Land): The analysis of future travel demand and existing infrastructure capacity indicates that the major shortfall in transportation capacity extends from the PUC to the Ewa area." (2-48)

Q32. By what specific method were the boundaries chosen?

Q33. Why is Māmala Bay included but Kahala excluded?

Q34. Why is Hickam AFB included but parts of Nūuanu excluded?

Q35. "EISPN Comments ... Enhanced Bus Alternative that increases both bus and auto efficiency (Life of the Land): The TSM and BRT Alternatives enhance bus and auto efficiency to varying degrees." Our question was: if Oahu has two cities and if both are to function, shouldn't express buses from throughout Oahu go regularly to both cities?

Q36. For example, one circle island bus that goes to Ala Moana and another that goes to Kapolei?

Q37. If the idea is really to get people out of cars, then shouldn't one model consist of double the number of buses you are planning?

Q38. Wouldn't such an "Enhanced Bus System, with regular express service 18 hours a day, provide people with the assurance that they can get places on time if they take a bus? If each Express Route had four buses per hour, one going to each of Kapiolani, the Airport, Downtown/Waikiki, and the Universities (UH, Chaminade), wouldn't a lot more people take the Express Buses?

"The PUC is so important in terms of islandwide trip generation and trip attraction that transportation planning for the PUC cannot be limited to only the PUC. Connections between the PUC and other parts of the island must also be considered." (2-49)

"The summaries are based on a set of 23 planning districts that consist of the 762 small subareas of the island, called "transportation analysis zones" (TAZs), used by computerized travel demand modeling programs." (3-39)

Q39. Please give several specific examples of "transportation analysis zones"

"About 100,000 bicycles are registered in Honolulu" (3-41)

"A 'sector' is defined as a large but recognizable geographic entity having generally consistent land use and visual character. Sectors are comprised of smaller units called "landscape units." Thirteen sectors and 70 landscape units along potential alignments were identified in the primary transportation corridor." (3-32)

Q40. Please give several specific examples of "landscape units"

"Twenty-four State, Federal and private databases were searched for sites containing hazardous materials in the primary transportation corridor." (3-75) Superfund = zero.

Q41. Pearl Harbor is a Superfund. It was placed on the National Priorities List because of contamination as a number of sites, including the Alita Laundry. Please list each of the 24 state, federal and private databases that left Pearl Harbor out of their listing of Superfund sites.

"The City's land use policy for the primary transportation project requires that transportation and land use be planned and developed together to implement a comprehensive urban growth strategy." (5-3) "To date, no potential TCPs [Traditional Cultural Properties or Practices] associated with the project have been identified." (3-43)

Q42. Are you molding a land/transportation growth system that will allow for the "orderly" expansion of the population by 250,000 new people in 20 years, and increasing the "efficient" movement of those people, and yet feel that there will be no positive or negative impact on cultural sites (increased use, overuse) for anything included as a potential TCP?

Q43. Please elaborate on the reports you are relying on, the studies you have conducted, and the depth of your analysis.

"By 2025, key intersections in the Urban Core would be near or at capacity under all alternatives. However, only the BRT Alternative would provide a non-congested travel mode through these intersections, achieving faster transit travel times within the Urban Core." (4-1.2)

Q44. Are you saying that adopting the proposed land use/transportation policies stated in this document, will only keep us even with the current levels of congestion?

Q45. What policies would get us ahead of the curve?

Q46. Please include those policies that would do so, even if they failed to make your "best-fit" alternatives list.

"Because the TSM Alternative includes an extensive network of semi-exclusive lanes in the PUC, bicycle usage could be affected where existing bike lanes are converted to joint-use bicycle/transit lanes. A policy would be established under the TSM Alternative allowing bicycles to use the semi-exclusive bicycle lanes." (4-24)

"The general approach to enhancing bicycle travel under the BRT Alternative includes ... bike racks ... bike parking facilities ... A separate bike lane would be provided, or an alternate route would be identified, where the transitway would interfere with the present pattern of bicycle travel." (4-24)

"Although most of the In-Town BRT alignment is not designed as a 'bikeway', roadways along the alignment are used by cyclists to varying degrees because of the paucity of bikeway facilities." (4-25)

Q47. How would the different alternatives change the "paucity of bikeway facilities" that currently exists?

"A bikeway can be a bike route, lane or path. ... Most of Honolulu's existing bikeways are not linked systematically ... When bikeways are not continuous, cyclists must use roadways that are not designed as bikeways. More confident cyclists often use the streets. Less confident cyclists tend to ride on sidewalks or landscaped areas off the roadway, although riding on sidewalks in business districts, such as Downtown, is illegal." (4-25)

Q48. How should reluctant bikers, such as those who have had vehicular-bicycle-interactions (car-smashing-into-bikes), deal with multi-use lanes replacing dedicated lanes?

"The BRT Alternative would indicate government's willingness to invest in a transit system thereby providing a sense of permanence in the primary transportation corridor, a policy action which has a strong influence in generating much needed developer interest in cities elsewhere." (5-4)

Q49. What is meant by the term "sense of permanence"?

Q50. How much is the city willing to invest in dedicated bike lanes?

Q51. Are bikers at risk of achieving a sense of impermanence?

"The major investment decisions center on how well the transit alternatives can shape growth, improve the quality of life, make the city and its neighborhoods more livable, and "Keep the Country Country" by containing sprawl." (5-4)

Q52. How do you define "sprawl"?

Q53. What are three examples of existing sprawl on Oahu?

Q54. If sprawl does not exist on Oahu, how will any plan stop sprawl?

Q55. If sprawl does exist on Oahu, how specifically will any plan stop more sprawl from occurring?

Q56. Please state how increasing the number of residents in Central Oahu by 35,000 and the number of residents elsewhere by 25,000 will contain sprawl?

Q57. If the first and second cities both grow rapidly, while growth elsewhere continues at its present rate, how is sprawl being contained?



Q58. Please list all successful efforts to contain sprawl on Oahu in the last 10 years.

"The BRT Alternative would provide greater growth-shaping opportunities as compared to the TSM and No-Build Alternatives." (3-4)

Q59. What is meant by "growth-shaping opportunities"?

Q60. Are there negative impacts sometimes associated with "growth-shaping"?

"The connecting transit services that feed into the backbone transit line also can help focus development into targeted areas. Thus, the BRT Alternative could offer growth-shaping opportunities, if it was accompanied by transit supportive local policies. This includes zoning, parking, and mixed-use permissive land use policies.

This assessment is consistent with the views of a panel of experts convened for this project in July 1999, which was comprised of land use/transportation planners and developers from other parts of the United States and Honolulu. The panel was assembled to address land use and growth-shaping aspects of the transit alternatives.

Among the findings and recommendations of the land use panel was the conclusion that without a major investment in a permanent fixed transit system, the desired growth pattern in the PUC would very likely not happen. The land use panel viewed the PUC as being "ripe" for development and redevelopment when the economy rebounds. The panel agreed that appropriate implementation tools need to be established that favor development in the PUC, and discourage or prohibit development where it is not desired.

It was concluded by the land use panel that many of the ingredients are in place in Honolulu to implement a transit system that could be influential in accomplishing the City's stated land use goals. This conclusion was conditioned upon a comprehensive transit/land use implementing strategy developed and managed by a strong land development implementation body." (3-6)

Q61. What are specific "transit supportive local policies"?

Q62. What would be the geographic range of "transit supportive local policies" dealing with zoning issues?

Q63. What would be the geographic range of "transit supportive local policies" dealing with parking issues?

Q64. What would be the geographic range of "transit supportive local policies" dealing with mixed-use issues?

Q65. What would be the geographic range of "transit supportive local policies" dealing with permissive land use issues?

Q66. What would be the geographic range of "transit supportive local policies" dealing with variances?

Q67. What does "'ripe' for development" mean?

Q68. The following statement uses the term "likely": "Among the findings and recommendations of the land use panel was the conclusion that without a major investment in a permanent fixed transit system, the desired growth pattern in the PUC would very likely not happen". Under what conditions could the desired growth pattern occur without an investment in a transit system?

Q69. What is meant by a "permanent fixed transit system"?

The following statement talks about discouraging and prohibiting some development: "The panel agreed that appropriate implementation tools need to be established that favor development in the PUC, and discourage or prohibit development where it is not desired."

Q70. What "appropriate implementation tools" are needed to discourage development?

Q71. What "appropriate implementation tools" are needed to prohibit development?

Q72. What specific development would be discouraged or prohibited?

Q73. Does "discouraged development" allow for variances?

Q74. Does "prohibited development" allow for variances?

Q75. How has the City government dealt with this issue in the past?

Q76. What is likely to change?

Q77. Will new implementation tools protect prime agricultural lands?

Q78. Will new implementation tools protect rural lands?

Q79. Will new implementation tools protect the community character of established communities?

Q80. What are the very specific in outlining the various ways the panel felt development could be discouraged?

Q81. What are the very specific in outlining the various ways the panel felt development could be prohibited?

Q82. What are the very specific in outlining the various ways the county should change existing ordinances so that undesired development could be discouraged?

Q83. What are the very specific in outlining the various ways the county should change existing ordinances so that undesired development could be prohibited?

Q84. What specifically did the panel mean by "This conclusion was conditioned upon a comprehensive transit/land use implementing strategy developed and managed by a strong land development implementation body"?

Q85. "Transportation and circulation are integral functions within a livable city. They should, therefore, be tightly integrated with land use management controls and policies." (3-8) What does "tightly integrated with land use management controls and policies" mean?

Q86. What would happen if transportation and circulation were only strongly integrated?

Q87. How does one measure degrees of integration?

Q88. Does "tightly integrated" mean that land use and transportation are dependent upon each other?

Q89. If not, how tight could they be with each other?

- Q90. If so, doesn't dependent utility require a joint EIS?
- Q91. What exactly is a "livable city"?
- Q92. One that you can survive in?
- Q93. Or one that you can have a life in?
- "The No-Build Alternative do not support the General Plan policies" (5-8)
- Q94. This statement sounds like "we must build to be in compliance." How can you complete a fair, reasonable, balanced presentation, if the No-Build is disqualified before comments arrive?
- "The No-Build and TSM Alternatives do not support the General Plan policy of achieving full development of the PUC. Potential impacts of these alternatives include continued pressure to urbanize outlying agricultural lands, higher transportation costs and limited choices for urban lifestyles. Implementation of the No-Build and TSM Alternatives would be inconsistent with current and proposed growth policies, particularly in the PUC where it would diminish the effectiveness of proposed DP policies to create a livable city." (5-8)
- Q95. What causes "continued pressure to urbanize outlying agricultural lands"?
- Q96. How do developments in the PUC have any effect on developments in agricultural areas?
- Q97. Are the development companies the same?
- "At the corridor level, all of the alternatives are consistent with the Hawaii State plan and the State Land Use Commission (SLUC) land use designations." (5-9)
- "No residential impacts are expected under any project alternative as a direct result of transit improvements. Whether to replace on-street parking in each impacted neighborhood is a policy to be decided by the City Council." (5-26)
- "Displaced persons are entitled to replacement housing payments in addition to the cost of the displaced dwelling. ... No residential displacements are expected as a result of the proposed project." (5-29)
- "Noise impacts ... BRT Alternative ... There would be no impacts projected with a wayside-powered electric vehicle such as STREAM." (5-51)
- "The City's land use policy for the primary transportation project requires that transportation and land use be planned and developed together to implement a comprehensive urban growth strategy." (5-3) "With respect to onshore ecosystems, natural habitat is very limited along the roadways and at the sites that would be affected by any of the alternatives." (5-36)
- Q98. Can any on-shore ecosystem be impacted from the BRT Alternative?
- Q99. Will increased traffic, population, lights, urbanization have any possible impact on any native species?
- Q100. "Increasing transit patronage (with the BRT Alternative) would reduce the non-point source pollution created by automobiles." (5-59) How?

- Q101. While the percentage of people who take buses may rise, won't there be an actual rise in the number of actual people who drive cars?
- Q102. How will that decrease water pollution?
- Q103. Isn't a major source of non-point-source-pollution the result of stop/go?
- Q104. Weren't "break pad wear and tear" what allowed federal highway monies to be used to study pollution in the Ala Wai Canal?
- Q105. How will increased bus use decrease vehicular nosp?
- Q106. "Overall, the Island VMT under the TSM Alternative is projected to be slightly lower than the VMT under the No-Build Alternative because many travelers would shift from passenger vehicles to buses due to improved transit service." (5-62) What are the supporting and opposing documents/studies that would indicate people make decisions based on transit quality?
- Q107. Will the number of vehicles rise under this scenario?
- Q108. "This estimate assumes that hybrid in-town BRT vehicles would be used." (5-63) Would these hybrids be LEVs, SLEVs (equivalent to the Prius), or ZEV?
- Q109. "Furthermore, an all-electric system would require approximately 11,300 kilowatts per day, which can be provided within the reserve capacity of existing power plants according to Hawaiian Electric Company." (5-63) What options exist for the use of fuel cells?
- Q110. Can the electricity needed be generated directed from the sun, through photovoltaics, for example, on the roofs of bus stops?
- Q111. What cities use such systems?
- "The BRT Alternative would consume up to 39 thousand fewer barrels of oil than the No-Build Alternative, and up to 31 thousand fewer barrels than the TSM Alternative in the design year 2025." (5-63)
- "The City's land use policy for the primary transportation project requires that transportation and land use be planned and developed together to implement a comprehensive urban growth strategy." (5-3) "Since a key purpose of this project is to focus future development in the Urban Core and Kapolei, the cumulative impacts of this project are viewed as positive." (5-81)
- Q112. What is a "transit oriented development" (5-81)
- Q113. Are "transit oriented development" as referred to on page 5-81, desirable?
- Q114. What are some drawbacks of "transit oriented development"?
- Q115. Can all possible proposed developments in the Urban Core and Kapolei be viewed as positive?
- Q116. If this proposal generates another plan for a "360-degree rotating gondola" and "light show on the clouds" would the development be good?

"Subsequent urban development and redevelopment could displace existing land uses. These displacements would be specific and analyzed during the environmental review of the subsequent development projects." (5-81)

"Impacts on water resources are highly regulated." (5-82)

"Continuation of current low density development patterns ... is inconsistent with the project purpose of concentrating development." (5-81)

"In the absence of sufficient people-carrying capacity, it would be more difficult to achieve the desired concentration growth pattern." (5-81)

Q117. Does this mean that desired concentration growth patterns are more difficult in rural, less populated, areas than in high-rise areas?

"With the TSM Alternative, people-carrying capacity would be increased" (5-81)

"Since the BRT Alternative would substantially enhance mobility by increasing people-carrying capacity, they would help focus growth along the alignment of the In-Town BRT system in the Urban Core." (5-81)

Q118. What large landowners would most benefit from this approach?

Q119. Will transit centers increase the value of nearby property?

Q120. What does "people-carrying capacity" mean?

Q121. Is it socially desirable to increase the "people-carrying capacity"?

Q122. What are some reasons that communities might want lower "people-carrying capacity"?

Q123. Does "help focus growth along the alignment" mean that the City will oppose growth elsewhere? If not, how will this contain sprawl?

"5.13.1 Cumulative Impacts -- Farmland. Agricultural activities occur in Ewa and central Oahu. State and City policies encourage urban development, particularly in Ewa. Consistent with State and City policies, urban development would convert some open spaces to urban land uses." (5-81)

"The No-Build Alternative would do little to achieve the vision for the future of Oahu." (7-1)

"Restoration of a balance between automobile, transit, pedestrian and bicycle modes is a prime objective within the primary transportation corridor." (7-6)

Q124. When did the balance exist?

Q125. What made it go out of balance?

Q126. How likely is it that the balance can come back?

Q127. What is the proper balance between pedestrian and bicycle modes?

Q128. Should balance be a prime objective only within the corridor?

Q129. What are the levels of balance and who determines them?

Q130. How is balance measured?

"The No-Build Alternative would rely on conventional diesel buses" (7-9) "The initial cost ... of the No-Build Alternative would be \$135.5 million ... The total cost ... would be \$316.9 million ... which includes the normal replacement of bus vehicles" (7-13) Diesel or electric?

"As part of the BRT Alternative ... improved visual conditions ... lighting. The quality of urban living would increase." (7-14)

Q131. What is the relationship between PCTP, ORTP and the OMPO CACT

Q132. Will the plan increase or decrease compliance with the ADA?

Q133. How will manuka-makai bicycle trips be affected?

Q134. Will alternative will allow greater shipment of bicycles?

Q135. How many bicycles could be transported each day?

Q136. Will the amount of green space in the PUC go up or down?

Q137. By how much?

Q138. The boundaries used in various reports do not line up. Why?

Q139. Are the following locations inside the boundary: (a) Waimanalo Gulch; (b) Ford Island; (c) Hickam Air Force Base? The Parsons Brinkerhoff Report (3/99) includes Inoquis Point, Diamond Head, and the Kahala Mall. The DEIS does not. Was the boundary changed after the EISPN was published?

Q140. Is the current scope of the project different than that proposed in the EISPN?

Q141. Why is part of Mamala Bay included in the Corridor?

Q142. Is both the University of Hawaii and Chaminade University in the PCTP?

"Moving into 21st Century Oahu will require implementing an integrated vision of both transportation and land use." Parsons Brinkerhoff -3/99, page 7

"Since sprawl development does not support itself through the additional revenue it creates, it must be subsidized by residents living in older, established neighborhoods." Parsons Brinkerhoff -3/99, page 8

Q143. How do we know that "sprawl development does not support itself"?

Q144. Do residents in "older, established neighborhoods" subsidize other neighborhoods and proposed developments?

Q145. Do all residents initially subsidize new projects or do developers pay for needed infrastructure to connect their proposed developments to the existing water, sewer, gas, electric and telephone grids?

"Second, prime agriculture and rural acreage is being converted into tract developments which, in some cases, are devoid of community character and sense of place." Parsons Brinkerhoff -3/99, page 8.

Q146. Which developments lack community character on Oahu?

Q147. If there are no such communities, why make the statement?

Q148. How will building multiple "super-blocks" make better community character and a sense of place?

"High investments in freeways, highways and surface streets, and relatively minimal investments in public transit and facilities to accommodate pedestrians and bicycles, have literally driven people into the suburbs." Parsons Brinkerhoff -3/99, page 9.

Q149. Since the development of the H-1, how has population been driven-out of Honolulu?

Q150. Did the population-level fall within the PCTP?

"Freeway ramps have attracted development of shopping malls and 'big box' stores" Parsons Brinkerhoff -3/99, page 10

Q151. Do "big box stores" exist because of freeway ramps or governmental policy that encourages large foreign-owned stores at the expense of local mom-and-pop stores?

"A balanced transportation system will help to stop sprawl" Parsons Brinkerhoff -3/99, page 11

"The vision for Honolulu neighborhoods includes a pleasant mix of small businesses, churches, schools, and locally owned and operated businesses within walking or biking distance of residences or connected by neighborhood circuitors." Parsons Brinkerhoff -3/99, page 15

Q152. How does Saint Louis Heights and Pacific Palisades coincide or differ from the statement: "The vision for Honolulu neighborhoods includes a pleasant mix of small businesses, churches, schools, and locally owned and operated businesses within walking or biking distance of residences or connected by neighborhood circuitors."?

"A ramp can be a single lane and reversible to permit operation townbound in the AM peak period and outbound in the PM peak." Parsons Brinkerhoff -3/99, page 30

Q153. What would a map of a reversible ramp look like?

"For example, relaxed parking requirements can be used as a redevelopment tool." Parsons Brinkerhoff -3/99, page 40

Let's define the following ratios:

Pedestrian-Ratio = cost of "facilities to accommodate pedestrians" divided by total new infrastructure cost

Bicycle-Ratio = cost of "facilities to accommodate bicycles" divided by total new infrastructure cost

What is the Pedestrian-Ratio and the Bicycle-Ratio for each Alternative?

Q154. How will the adoption of one of these Alternatives have any effect on protection of prime agricultural lands.

"One of the keys to this islandwide vision was improved public transit between Kapolei and the University of Hawaii. This is the focus of the ongoing Primary Corridor Transportation Project." (Oahu Trans 2K Progress Report, Fall 1999)

Parsons Brinkerhoff published a 44 page booklet in March 1999. The cover states: "Islandwide Mobility Concept Plan", "Primary Corridor Transportation Plan" and "Oahu Trans 2K." (Parsons Brinkerhoff -3/99)

Q155. What does "sustainable" mean? "The Mobility Concept Plan ... It is not only sustainable over the long run, but absolutely necessary to shape an economically robust future for Oahu." (Parsons Brinkerhoff -3/99, page iv).

"Promoting economic development is also critical to maintaining the health of our island communities." (Parsons Brinkerhoff -3/99, page vi)

"Automobile-driven sprawl largely determined how Oahu developed over the last several decades" (Parsons Brinkerhoff -3/99, page 1)

"But there is a growing recognition that over-dependence on the automobile has led to widespread urban and suburban sprawl, loss of open space and ever increasing traffic congestion." (Parsons Brinkerhoff -3/99, page 2)

"Any successful transportation plan will make it easier and more pleasant to drive, not more difficult" (Parsons Brinkerhoff -3/99, page 2)

"The economic patterns generated by automobile dependence contributes to the decline of neighborhood retail and office districts and the small businesses that formerly thrived in them." (Parsons Brinkerhoff -3/99, page 2)

"Special features of the integrated transportation system include ... An expanded network of bicycle lanes and walking paths" (Parsons Brinkerhoff -3/99, page 3)

Q156. How will the BRT Alternative enable the C&CH to "Keep the country country"?

Q157. How will the BRT Alternative enable the C&CH to "Make Honolulu and Kapolei more attractive, livable cities"?

Q158. How will the BRT Alternative enable the C&CH to "Reclaim the waterfront"?

Q159. How will the BRT Alternative enable the C&CH to create "A healthy and multi-faceted visitor industry"?

Q160. What is the relationship between the "21st Century Oahu Vision Program," the "Oahu Trans 2K," the "Islandwide Mobility Concept," and the PCTP?

Q161. What is meant by "mobility options"?

The goal is to encourage properly planned new development in the urban core, increasing opportunities for people to live, shop, work, and socialize all within a particular neighborhood or geographic area and minimizing the need to constantly travel long distances.

When older neighborhoods are "revitalized", new families come in. The price of property rises. Some of the older residents are then financially squeezed. Property taxes rise. People either leave or cope. Is this what is meant by the following statement: "Achieving this vision means encouraging redevelopment of older urban neighborhoods by

d. Will the lines to and from the substation be underground or overhead?  
e. What HECO substation will this substation be attached to?  
f. What are the expected EMF readings at the transit stop?

Q166. Kulihi/University Substation. Appendix B-TRM-8

- What is the anticipated size of the substation (measurements and capacity)?
- Will the substation be enclosed?
- Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout?
- Will the lines to and from the substation be underground or overhead?
- What HECO substation will this substation be attached to?
- What are the expected EMF readings at the transit stop?

Q167. University (between Dole/Mezcal) Substation. Appendix B-TRM-9

- What is the anticipated size of the substation (measurements and capacity)?
- Will the substation be enclosed?
- Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout?
- Will the lines to and from the substation be underground or overhead?
- What HECO substation will this substation be attached to?
- What are the expected EMF readings at the transit stop?

Q168. Aloha Tower Substation. Appendix B-TRM-10

- What is the anticipated size of the substation (measurements and capacity)?
- Will the substation be enclosed?
- Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout?
- Will the lines to and from the substation be underground or overhead?
- What HECO substation will this substation be attached to?
- What are the expected EMF readings at the transit stop?

Q169. Kamakee/Auahi Substation. Appendix B-TRM-11

- What is the anticipated size of the substation (measurements and capacity)?
- Will the substation be enclosed?
- Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout?
- Will the lines to and from the substation be underground or overhead?
- What HECO substation will this substation be attached to?
- What are the expected EMF readings at the transit stop?

Q170. Ala Moana (near Hobron) Substation. Appendix B-TRM-13

- What is the anticipated size of the substation (measurements and capacity)?
- Will the substation be enclosed?
- Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout?
- Will the lines to and from the substation be underground or overhead?
- What HECO substation will this substation be attached to?
- What are the expected EMF readings at the transit stop?

Q171. Kalia Road/Mahulia Substation. Appendix B-TRM-13

- What is the anticipated size of the substation (measurements and capacity)?
- Will the substation be enclosed?
- Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout?
- Will the lines to and from the substation be underground or overhead?
- What HECO substation will this substation be attached to?

improving the quality of life of these areas to attract new residents." The new residents will enjoy a high quality of life while the existing residents on fixed income will move-out.

"A transit-based travel option, with frequent express service to and from Downtown and connections to strategically located transit centers along the way, is a necessary transportation element to link Oahu's first and second cities, and will encourage their coordinated growth." Isn't it more likely that their coordinated growth will be related to the fact that the two cities have the same county council and mayor?

The PUC will remain the center for employment, cultural activities, educational opportunities, regional shopping, and recreation. It will continue to serve as a major hub for commuters, students and other individuals from all parts of the island.

Q162. "In general, the areas that would be converted to transitways are existing general purpose lanes, shoulders and medians. The BRT Alternative incorporates a very high level of transit service to draw people out of single-occupant automobiles." Why not include a much higher use of buses, as suggested by some of the commenters on the EISPN?

"A computer model was used to see how regional traffic mobility and transit ridership would be affected under each alternative. The transportation analyses indicated that major regional roadways would still have traffic bottlenecks in 2025 under any of the alternatives. However, the BRT Alternative would offer an alternative, fast, efficient travel mode through the congestion for those choosing to travel by transit, because transit vehicles would use the uncongested exclusive and semi-exclusive transitway lanes."

The BRT Alternative would not necessarily improve automobile movements through congested intersections. However, it would dramatically increase the person-throughput capacity of streets within the urban core by an average of 10 percent (measured in terms of persons per hour).

Have any transit systems in the US experienced what is suggested by the following statement? "An efficient transit system should cause the demand for parking to decline within urban Honolulu. New neighborhood off-street parking facilities could be developed if community-based planning determined it was needed."

Q163. "What are bicycle mitigation measures? Environmental mitigation considerations, including mitigation for loss of on-street parking, replacement of loading zones, and coordination of details of the bicycle mitigation measures with cyclists."

PCTP BRT Alternative. Draft Conceptual Design Drawings. Technical Appendix B ("Appendix B")

Q164. Kaliaokalani/Kapiolani (Convention Center) Substation Appendix B-TRM-7

- What is the anticipated size of the substation (measurements and capacity)?
- Will the substation be enclosed?
- Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout?
- Will the lines to and from the substation be underground or overhead?
- What HECO substation will this substation be attached to?
- What are the expected EMF readings at the transit stop?

Q165. Kapiolani/Hoava Substation. Appendix B-TRM-7

- What is the anticipated size of the substation (measurements and capacity)?
- Will the substation be enclosed?
- Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout?

c. What are the expected EMF readings at the transit stop?

Q172. Kūhio Seaside Substation. Appendix B-TRM-14

- What is the anticipated size of the substation (measurements and capacity)?
- Will the substation be enclosed?
- Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout?
- Will the lines to and from the substation be underground or overhead?
- What HECO substation will this substation be attached to?
- What are the expected EMF readings at the transit stop?

Q173. Kalakaua/Duke's Substation. Appendix B-TRM-14

- What is the anticipated size of the substation (measurements and capacity)?
- Will the substation be enclosed?
- Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout?
- Will the lines to and from the substation be underground or overhead?
- What HECO substation will this substation be attached to?
- What are the expected EMF readings at the transit stop?

Q174. Kāhala/Uluniu (Waikiki Beach) Substation. Appendix B-TRM-14

- What is the anticipated size of the substation (measurements and capacity)?
- Will the substation be enclosed?
- Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout?
- Will the lines to and from the substation be underground or overhead?
- What HECO substation will this substation be attached to?
- What are the expected EMF readings at the transit stop?

Q175. Kealahou/Kūhio Substation. Appendix B-TRM-14

- What is the anticipated size of the substation (measurements and capacity)?
- Will the substation be enclosed?
- Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout?
- Will the lines to and from the substation be underground or overhead?
- What HECO substation will this substation be attached to?
- What are the expected EMF readings at the transit stop?

Q176. Kūhio/Kapahulu (Kapiolani Park) Substation. Appendix B-TRM-14

- What is the anticipated size of the substation (measurements and capacity)?
- Will the substation be enclosed?
- Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout?
- Will the lines to and from the substation be underground or overhead?
- What HECO substation will this substation be attached to?
- What are the expected EMF readings at the transit stop?

Q177. McNeill/Dillingham Substation. Appendix B-TRM-2

- What is the anticipated size of the substation (measurements and capacity)?
- Will the substation be enclosed?
- Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout?
- Will the lines to and from the substation be underground or overhead?
- What HECO substation will this substation be attached to?
- What are the expected EMF readings at the transit stop?

Q178. Dillingham (Honolulu Community College across from Alaka'a) Substation. Appendix B-TRM-3

- What is the anticipated size of the substation (measurements and capacity)?
- Will the substation be enclosed?
- Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout?
- Will the lines to and from the substation be underground or overhead?
- What HECO substation will this substation be attached to?
- What are the expected EMF readings at the transit stop?

Q179. Iwilei Rd extension/Kaahali Substation. Appendix B-TRM-3

- What is the anticipated size of the substation (measurements and capacity)?
- Will the substation be enclosed?
- Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout?
- Will the lines to and from the substation be underground or overhead?
- What HECO substation will this substation be attached to?
- What are the expected EMF readings at the transit stop?

Q180. Kakaū/Hotel Substation. Appendix B-TRM-4

- What is the anticipated size of the substation (measurements and capacity)?
- Will the substation be enclosed?
- Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout?
- Will the lines to and from the substation be underground or overhead?
- What HECO substation will this substation be attached to?
- What are the expected EMF readings at the transit stop?

Q181. Bishop/Hotel (Union Mall) Substation. Appendix B-TRM-4

- What is the anticipated size of the substation (measurements and capacity)?
- Will the substation be enclosed?
- Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout?
- Will the lines to and from the substation be underground or overhead?
- What HECO substation will this substation be attached to?
- What are the expected EMF readings at the transit stop?

Q182. King/Mililani (Iolani Palace) Substation. Appendix B-TRM-4

- What is the anticipated size of the substation (measurements and capacity)?
- Will the substation be enclosed?
- Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout?
- Will the lines to and from the substation be underground or overhead?
- What HECO substation will this substation be attached to?
- What are the expected EMF readings at the transit stop?

Q183. King/Cooke Substation. Appendix B-TRM-5

- What is the anticipated size of the substation (measurements and capacity)?
- Will the substation be enclosed?
- Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout?
- Will the lines to and from the substation be underground or overhead?
- What HECO substation will this substation be attached to?
- What are the expected EMF readings at the transit stop?

Q184. Pensacola/Kapiolani Substation. Appendix B-TRM-6

- What is the anticipated size of the substation (measurements and capacity)?

- b. Will the substation be enclosed?
- c. Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout?
- d. Will the lines to and from the substation be underground or overhead?
- e. What HECO substation will this substation be attached to?
- f. What are the expected EMF readings at the transit stop?

Q185. Kapiolani/Keaumoku Substation. Appendix B-TRM-6

- a. What is the anticipated size of the substation (measurements and capacity)?
- b. Will the substation be enclosed?
- c. Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout?
- d. Will the lines to and from the substation be underground or overhead?
- e. What HECO substation will this substation be attached to?
- f. What are the expected EMF readings at the transit stop?

Q186. What currently exists at the Iwilei Transit Center / Park-and-Ride Site?

Q187. Has the Neighborhood Board taken a position on use of the site?

Q188. Is the proposed site listed in the first volume of the PCTP DEIS?

Q189. What currently exists at the Middle Street Transit Center / Park-and-Ride Site?

Q190. Has the Neighborhood Board taken a position on use of the site?

Q191. Is the proposed site listed in the first volume of the PCTP DEIS?

Q192. Why has the public presentations heavily favored the BRT choice over the no-build and other transportation system management options?

Q193. How can a fast-track approach get with community consensus?

Q194. How does the Major Investment Study analyze economic analysis on alternative modes of transportation and its impact on private transportation systems.

Q195. Has DTS maximized the efficiency of its current bus system?

Q196. What will be the business impact due to the loss of loading zones?

Q197. Hawaii is the home to a large number of endangered and threatened species. While any given project can minimize the loss of species, the gradual, incremental, expansion of population into mauka regions CAN lead to a loss of habitat. Population growth, increased tourism, conversion of open areas to urban growth, and expansion of transportation (allowing easier access to areas) CAN lead to loss of critical habitat. What precautions have been taken such that the heavily interwoven land use/transportation planning approach will not lead to critical losses in habitat? Please be specific. What studies were reviewed? What people were interviewed? How was the analysis completed? What new analysis was done? What are the credentials of the people who did the analysis for the EIS?

Q198. Please enclose a full bibliography.

Q199. Please enclose a full list of terminology.

Q200. What are the terms, conditions, and requirements of federal funding for this project?

Q201. At the first PCTP/Oahu Trans 2K "town meeting" we attended, you asked, so what would you like at your train station? Did you ever find out the answer to that question?

*Amy Curtis*

Henry Curtis  
Executive Director  
Life of the Land

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TPD1100-05357R

November 13, 2002

Mr. Henry Curtis, Executive Director  
Life of the Land  
76 North King Street, Suite 203  
Honolulu, Hawaii 96817

Dear Mr. Curtis:

Subject: Primary Corridor Transportation Project

This is in response to your November 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. The BRT Alternative states that the number of people will rise by 200,000 over 20 years; the number of trips to/within downtown will rise by 300,000; one mile of loading zones will be removed from downtown; hundreds of parking pieces will be removed from downtown; and lanes will be dedicated to non-automobiles. The result: The BRT Alternative would not necessarily improve automobile movements through congested intersections.

Response: Comment noted.

2. How come all possible negative impacts are so sugar-coated? It does not take a rocket scientist to note that loss of lanes, loss of left-hand turn lanes, loss of parking and loading zones, and increased use of cars most certainly will have an impact on the movement of cars!

Response: It is unclear what you mean by "sugar-coated". The MIS/DEIS and FEIS factually report the results of the traffic analyses.

3. Reading the Draft EIS, one gets the initial feeling that transportation impacts are minimal, if they exist at all! Anything controversial was either relegated to the Appendix B which was not made publicly available, except by request?

Response: The MIS/DEIS discloses the transportation impacts in Chapter 4, Appendix B, which was accessible to the public, contains Conceptual Engineering Drawings for the BRT Alternative (now Refined LPA).

4. Why exclude the location of site-specific structures in the main text (volume 1). Because some Neighborhood Boards have expressed concerns. Discussion omitted. However, a more careful reading of this DEIS leaves us with the impression that the writers are trying to cover something up! An EIS is by definition, a planning document, that reasonable and fairly evaluates alternatives. This EIS is designed to promote one alternative, and to avoid a realistic appraisal of impacts and mitigations.

Mr. Henry Curtis  
Page 2  
November 13, 2002

Response: If you are referring to the location of the traction power substations (TPSS) that would be required if an embedded plate technology were chosen, TPSS locations and related impacts were disclosed in the Supplemental Draft Environmental Impact Statement (SDEIS) and are included in the FEIS.

The MIS/DEIS fully discloses potential impacts and fairly evaluates the No-Build, TSM and BRT Alternatives in a balanced manner that is sufficient for the purpose of the MIS/DEIS. The FEIS discloses the general locations proposed, physical characteristics and related impacts of the traction power substations should all-electric vehicle technology be used for the In-Town BRT. Since installation of the TPSS would not start until 2010 and would not be completed until 2017, it is likely that some sites currently being considered will not be available then and alternative sites will be located. At that time more detailed, site specific environmental analyses will be performed.

5. With regard to the statement on page S-3 ("The City's land use policy for the primary transportation project requires that transportation and land use be planned and developed together to implement a comprehensive urban growth strategy; 7). How will planning them together but analyzing their impacts separately lead to sound planning?

Response: The BRT Alternative was evaluated as being consistent with the Public Review Draft of the Primary Urban Center Development Plan (June 1999), as it relates to "high capacity transit corridors" and "urban villages" concepts. These concepts are supportive of, and consistent with, the type of transportation improvements provided by the In-Town BRT, which would be designed to support current land uses and facilitate potential transit-oriented development, particularly in vacant and underutilized parcels in Kakaako, Iwalei, and near Ala Moana Center and the Convention Center. These are localities where development is likely to occur with or without the PCTP.

6. "The Draft PUC Development Plan update calls for the PUC to capture 36 to 43 percent of Oahu's growth over the next 25 years." (S-4) With regard to the statement on page S-4 as stated above, isn't the Draft PUC Development Plan advisory only, with lots of shoulds instead of musts?

Response: The development plans, which are required by the City Charter, together with the General Plan, guide public improvement projects and zoning. As part of the annual city budget process, all capital improvement projects are reviewed to determine if they are consistent with the respective development plan. Development plans are also intended to guide private sector investment decisions.

7. Doesn't the Draft PUC Development Plan leave lots of room for anything to be built?

Response: See response to comment #6.

8. "The TSM Alternative ... Where possible, existing bike lanes would be replaced by joint use bicycle/transit lanes." (S-12). With regard to the statement on page S-12 as stated above, will replacing existing bike lanes with multi-use bike lanes be safer or more dangerous for bicycle riders?

Response: Please be aware that under the TSM Alternative, the semi-exclusive bus lanes would operate only during peak periods. Using curbside lanes on certain roadways, the semi-exclusive lanes would be reserved for buses, except for vehicles turning into and out of driveways and turning right at intersections. No existing bike lanes would be affected. The statement noted on



Page S-12 gave incorrect information that bike lanes would be displaced under the TSM Alternative. This has been corrected in the FEIS. Since the curbside lanes would not physically change, the use of these lanes for cycling would remain the same as they are today with the level of safety also remaining the same.

9. With regard to the statement on page S-12 as stated above, what is the safety of bicycles in the case of multi-use bike lanes based on?

**Response:** As stated in the response above, the TSM Alternative would not affect any existing bike lanes. Bicycle safety is largely based on the potential for conflicts, which are situations where the cyclist, motor vehicle, pedestrian or other cyclist has to initiate an action (brake or swerve) to avoid a collision. An example of a conflict is a vehicle overtaking a cyclist to make a right turn at an intersection and the cyclist has to brake quickly to avoid colliding with the vehicle. Where the avoidance action is unsuccessful, a collision occurs. A study sponsored by the Federal Highway Administration (FHWA) *Bicycle Lanes Versus Wide Curbside Lanes: Operational and Safety Findings and Countermeasure Recommendations*, October 1998 found higher bicycle-motor vehicle conflict rates on roads with bike lanes than roads with wide curbside lanes (6.7 versus 5.1 per 100 cyclists). However, the study noted this difference was attributable to site specific conditions of the areas studied. In other words, the bike lanes did not cause a higher number of conflicts but rather external factors, such as the presence of parked vehicles, illegal parking or stopping and the presence of driveways and intersecting streets contributed to the higher number of bicycle-motor vehicle conflicts. These and other factors, such as motor vehicle volumes and speed, affect the level of bicycle safety because they increase the potential for bicycle-motor vehicle conflicts regardless of whether the roadway has bike lanes. Nevertheless, with all things being equal, a roadway with bike lanes would likely present fewer opportunities for bicycle-motor vehicle conflicts than a roadway with normal 11- to 12-foot-wide curbside lanes with no shoulders. Similarly, a roadway with wide (e.g., 14 feet or wider) curbside lanes and/or with shoulders would also present fewer opportunities for bicycle-motor vehicle conflicts than a roadway with normal width curbside lanes with no shoulders with all other things being equal.

10. With regard to the statement on page S-12 as stated above, for similar routes and times, which lane is more popular in terms of actual bicycle use, single purpose or multiple purpose lanes?

**Response:** The FHWA study identified in response to comment #9 noted that bicyclist preference surveys have indicated that cyclists prefer using roadways with bike lanes rather than roadways without bike lanes, even if they have wide curbside lanes. The study concluded that bike lanes are more likely to increase cycling than using wide curbside lanes. However, cyclists would find wide curbside lanes preferable to normal 11- to 12-foot-wide curbside lanes with no shoulders. The Hawaii Bicycling League concurs with this conclusion.

11. With regard to the statement on page S-12 as stated above, for similar routes and times, which lane is more dangerous in terms of actual bicycle use, single purpose or multiple purpose lanes?

**Response:** Please see responses to comments #9 and #10 regarding the factors that affect bicycling safety. Bicycle-motor vehicle collisions have the potential to cause the most severe injury or death to the cyclist. Another study by FHWA, which analyzed hospital data, found bicycle-motor vehicle accidents required 24.7 percent of the cyclists to be admitted to the hospital and 1.3 percent were fatal as opposed to 9.6 percent and 0.3 percent, respectively, for bicycle only accidents. As stated above, the factors that contribute to the number of bicycle-motor vehicle conflicts include the width of the curbside lane, the existence of shoulders or parked cars, the

presence of intersecting roadways and driveways, and adjacent land uses. The presence of bike lanes could reduce the likelihood of bicycle-motor vehicle conflicts, but in certain circumstances may not make a difference.

12. With regard to the statement on page S-12 as stated above, what types of lanes cause the most bicycle accidents?

**Response:** See responses to comments #9, #10 and #11.

13. With regard to the statement on page S-12 as stated above, what types of lanes cause the most deadly bike accidents?

**Response:** See responses to comments #9, #10 and #11.

14. Are sound barriers along state roads within the purview of the county? "Other project structures, such as sound barriers along H-1 Freeway, would be sensitively designed within the context of their surroundings." (S-13)

**Response:** The sound barriers along the H-1 Freeway are no longer considered to be part of the proposed project. However, they will be located within the State right-of-way and would be constructed as a separate SDOT project.

15. Doesn't this assume the same growth rate regardless of the type of bus/rapid transit system built? "Reduced auto usage under the BRT Alternative would save about 39,000 barrels of oil each year in comparison to the No-Build Alternative. The TSM Alternative would save about 8,600 barrels of oil per year compared to the No-Build." (S-13)

**Response:** The growth of population was consistent among all alternatives. The growth in VMT is developed through the traffic modeling and would vary depending on alternative.

16. Does the statement "The City's land use policy for the primary transportation project requires that transportation and land use be planned" take into account the different carrying capacity of the city -- dependent upon the transportation system adopted?

**Response:** A transportation system is one among other major factors, such as land availability, water supply and other infrastructure, that determine the amount of development in any particular area.

17. If the BRT Alternative allows faster development, isn't it possible that the total use of oil will rise, even if per capita use of oil falls?

**Response:** It is possible that energy usage could increase or decrease depending on the alternative selected. The savings in energy resulting from the Refined LPA could help offset any energy increase resulting from development. While it may help shape where growth occurs, it is not expected that the BRT would promote "faster" development or induce development to occur at an increased rate.

18. Which poses more impacts on endangered and threatened wildlife: average per capita pollution or total pollution?

**Response:** Both measurements of pollution reflect the potential for impacts on wildlife.

19. "Unanticipated Resources" means what?

**Response:** If the comment pertains to the term as used in Sections 5.0 (page 5-2) and 5.12.13 (page 5-80) of the MIS/DEIS, it refers to archaeological resources. Page 5-2 has been revised in the FEIS to clarify this term.

20. What is an "archaeological contingency procedure"?

**Response:** An archeological contingency procedure refers to a procedure for the handling of archaeological resources should unanticipated resources be encountered during construction.

21. As we are currently pulling ourselves out of a nine year recession, is our quality of life decreasing right now?

**Response:** Chapter One of the MIS/DEIS, Purpose and Need, pointed out that increasing traffic congestion is adversely affecting the quality of life of many citizens. The PCTP project is aimed at addressing this problem as well as trying to improve the quality of the urban environment, which is also a factor in overall quality of life.

22. The purpose of the Primary Corridor Transportation Project is to examine candidate investments that would improve the efficiency of both the transportation system in the primary transportation corridor, and the connections between the corridor and the rest of the island. (1-1) What is meant by "candidate investments", donations by politicians?

**Response:** The term "candidate investments" refers to alternative improvement projects being considered for selection as the LPA.

23. The City's land use policy for the primary transportation corridor requires that transportation and land use be planned and developed together to implement a comprehensive urban growth strategy. (1-5) How does mauka-makai transit mesh with "A high capacity (east-west) transit spine through the PUC would enhance in-town mobility" "A high capacity transit spine through the PUC would enhance in-town mobility and provide transit connections between the many travel markets that existing within the urban core." (1-6)

**Response:** The In-Town BRT, which predominately travels east-west, is only one element of the transit plan for the Primary Urban Center. The plan also includes conversion of the bus system to a hub-and-spoke network. The hub-and-spoke network would consist of new local circulator routes, as well as continuation of many existing line haul and express routes. These circulator routes would service the "mauka-makai" ridership needs. The goal is to have an integrated network of transit services that are convenient and cost-effective for potential users.

24. According to figures in this document, the expected growth rate would be: PUC=45%; Ewa=30%; Other=30%. If 3 out of 10 new residents will live outside of the PUC and Ewa, why do you say: "encouraging growth in only two areas"? Table 1.2-1 Projected Population Summary and Paragraph Waialai 2,300 • Other PUC 66,800 • Ewa 59,800 • Central Oahu 34,391 • Other 25,809 • Total 209,200.

**Response:** Although all Development Plan areas would experience some population growth, it is the intention of the City and County of Honolulu to direct much of the population growth to the Primary Urban Center and Ewa.

25. The best-fit alternatives, the choices that we are reviewing, were made without public review, right? The alternatives described in this chapter evolved over the course of developing the MIS/DEIS through an iterative process wherein a wide range of options was progressively analyzed in increasing detail until it was winnowed down to the "best fit" alternatives." (2-1)

**Response:** Public input from Rounds 1 and 2 of the Oahu Trans 2K outreach program was used to winnow down the alternatives. In Rounds 3 and 4 of the Oahu Trans 2K meetings the No-Build, TSM, BRT and BRT/SISP alternatives were presented. At these meetings, public input confirmed the major concepts and provided additional input on the alternatives that were used to further refine them.

Subsequent to the Round 4 Oahu Trans 2K meetings it was decided, based upon input from coordinating public agencies, to move the Sand Island Scenic Parkway element forward separately from the transit alternatives being considered in the MIS/DEIS.

26. Doesn't NEPA require all reasonable alternatives? Where did you get the term "best-fit" alternatives? Who's best-fit? How is the number of buses determined in each scenario? Don't cities tend to vary in their population/number-of-buses ratio? Wouldn't a lower ratio have a greater impact than a high ratio? Was the EIS be used to calculate the desired ratio? Will some planner, without public input, decide that number?

**Response:** The term "best fit alternatives" was used in the MIS/DEIS to describe all reasonable alternatives that were most consistent with the project's purposes and needs.

The number of buses required in each alternative was established based on the number of riders forecast using the regional travel demand forecasting models developed by OMPO.

27. What is the relationship between "reasonable candidate investments" and "best-fit alternatives"?

**Response:** See response to comment #26.

28. What specific documents mention SISP? Please explain fully: "The concept of a direct connection between Keolu Interchange and Kakaako via Sand Island was developed to provide a more direct and scenic gateway entry to Waikiki and Kakaako for visitors and others from the Airport and points ewa. This is called the Sand Island Scenic Parkway, or SISP." (2-2)

**Response:** The Sand Island Scenic Parkway (SISP) is described in Chapter 2 of the MIS/DEIS. Subsequent to the Round 4 Oahu Trans 2K meetings, it was decided, based upon input from coordinating public agencies, to move the SISP element forward separately from the transit alternatives being considered in the MIS/DEIS.

29. How would the city do this? "Highway Alternative to the Regional Transit System. ... New express lanes for vehicles with 3 or more occupants would be constructed within the median of the H-1 Freeway in each direction between Kapolei and Managers Drive." (2-42)

**Response:** These improvements were part of the 1995 Oahu Regional Transportation Plan (Table 5-2, TDM Element - HOV Facilities, 2020 Oahu Regional Transportation Plan - projects scheduled for period 2006-2020) and in the OMPO TOP 2025 Plan. SDOT will implement the express lanes, not the City.

30. *Hasn't the State DOT found that P.M. zip lanes will not work? What has changed?*

**Response:** The State DOT identified three issues that needed to be resolved for the P.M. zipper lane to be feasible. Issue #1: The Pearl City viaduct might be unable to support the additional weight of the movable barriers. Issue #2: There may be insufficient space to place the movable barriers. Issue #3: The volume of traffic heading Diamond Head-bound in the P.M. peak period is greater than the capacity of the 3 lanes that would be available. Resolution for Issue #1 and Issue #2: The existing median concrete barrier would be removed and replaced with movable barriers. Movable barriers are lighter than the existing median barriers and would take up the same amount of space. Resolution for Issue #3: The Diamond Head-bound shoulder lane, which is currently in operation during the A.M. peak period, would be made available to traffic during the P.M. peak period as well.

31. *Are HOV's currently maintained?*

**Response:** Except for the P.M. peak period, when the Koko Head-bound HOV lane on H-1 between Waialua Interchange and Redford Drive would not be available, all existing HOV lanes would be maintained with the Refined LPA.

32. *Don't one out of three cars in the HOV contain only one person?*

**Response:** Statistical data regarding occupancy violations in the HOV lanes have not been compiled by the State of Hawaii Traffic Section. However, it has been noted that the violation rate in the HOV lanes is high. Enforcement is a key component to obtaining occupancy compliance.

33. *Isn't the limited enforcement precisely why so many disobey the law?*

**Response:** Vehicle occupancy requirements are not rigorously enforced which has resulted in a high rate of violations. In many sections of the freeway system, the requirements cannot be enforced without compromising safety, since there is insufficient shoulder space available for traffic officers to pull vehicles over. The proposed P.M. zipper lane on Interstate H-1 includes adequate shoulder space for pulling over vehicles.

34. *If all lanes were HOV, wouldn't the traffic pattern be identical? No enforcement? (This lack of enforcement excludes tickets given to accident victims, or cars crossing the yellow line by the airport where the zip lane merges with the other lanes).*

**Response:** None of the improvement alternatives propose to restrict all of the lanes to HOV use.

35. *"EISPN Comments ... Why is an extension to Kahala not considered? (Outdoor Circle; Life of the Land): The analysis of future travel demand and existing infrastructure capacity indicates that the major shortfall in transportation capacity extends from the PUC to the Ewa area." (2-48)*

**Response:** Congestion is forecast to be most severe in the corridor Ewa of downtown through to Waikiki and UH Manoa. This is where a high level transit system could be most effective in attracting people out of their autos.

36. *By what specific method were the boundaries chosen?*

**Response:** The study area was broadly defined to encompass the H-1 Corridor from Kapolei to UH-Manoa and Waikiki. This area was selected because it has the highest levels of congestion today, and has the greatest likelihood to worsen in the future if left unabated.

37. *Why is Mamala Bay included but Kahala excluded?*

**Response:** If you are referring to the figures depicting the Primary Transportation Corridor Study Area (Figures 1.0-1 and others), the marked area should not be taken literally. The figure is intended as a guide to help readers understand roughly where the Primary Transportation Corridor is located.

38. *Why is Hickam AFB included but parts of Nuuanu excluded?*

**Response:** See response to comment #37.

39. *"EISPN Comments ... Enhanced Bus Alternative that increases both bus and auto efficiency (Life of the Land): The TSM and BRT Alternatives enhance bus and auto efficiency to varying degrees." Our question was: if Oahu has two cities and if both are to function, shouldn't express buses from throughout Oahu go to both cities?*

**Response:** There will be express bus service to Kapolei as well as from Kapolei in the A.M. peak period.

40. *For example, one circle island bus that goes to Ala Moana and another that goes to Kapolei?*

**Response:** See response to comment #39.

41. *If the idea is really to get people out of cars, then shouldn't one model consist of doubling the number of buses you are planning?*

**Response:** The number of buses in each alternative is a reflection of the number of buses required to efficiently serve the projected ridership with that alternative. The Refined LPA reflects a 36 percent increase in seats provided compared to the No-Build Alternative.

42. *Wouldn't such an "Enhanced Bus System, with regular express service 18 hours a day, provide people with the assurances that they can get places on time if they take a bus? If each Express Route had four buses per hour, one going to each of Kapolei, the Airport, Downtown/Waikiki, and the Universities (UH, Chaminade), wouldn't a lot more people take the Express Buses?*

**Response:** There are many factors that affect ridership on express routes. Therefore, substantially increasing service may not in and of itself result in increased ridership.

43. *Please give several specific examples of "transportation analysis zones."*

**Response:** The OIMPO Travel Demand Forecasting model subdivides the island into 761 transportation analysis zones (TAZ)s. Criteria used in defining the TAZ's were:

1. Highway or street network connectivity
2. Natural or manmade barriers (e.g., streams, ridges, and freeways)
3. Census tract boundaries
4. Development plan areas
5. Land use

6. Future Development Plans
7. Special Generators (e.g., military bases, colleges/universities, shopping centers)
8. Walk access to transit lines
9. Zone density

Examples of TAZ's are: Zone 120 in Waikiki bounded by Kuhio Avenue, Kalia Avenue, the Ala Wai Canal, and Naha Street, and Zone 624 in Waianae bounded by the coastline, Luakualae Naval Road, Mohai Street, and the Uehewa Channel.

44. Please give several specific examples of "landscape units".

**Response:** Landscape units are defined as a recognizable physical area that have physical unity and characteristics that make it part of a single area, district or "piece." An example of a landscape unit would be the stretch along Kalia Road, from Ala Moana Blvd. to Saratoga Road - grassy and well-landscaped open spaces toward the mountain side of Kalia Road, while the hotels (Hilton Hawaiian Village and Hale Koa) on the ocean side form a harder built-up edge. Another example of a landscape unit would be the stretch of King Street from Richards Street to the area Diamond Head of Kawaiahao Church and Honolulu Hale. This area contains historic monarchy-era buildings and landscaped open spaces, unique to downtown Honolulu. Another example would be University Avenue, between Kapiolani Boulevard and King Street.

45. Pearl Harbor is a Superfund. It was placed on the National Priorities List because of contamination of a number of sites, including the Ala Laundry. Please list each of the 24 state, federal and private databases that list Pearl Harbor out of their listing of Superfund sites.

**Response:** Correct. It was mistakenly left out. Pearl Harbor was listed on the NPL (Superfund) on October 13, 1982 and is identified as a Superfund site in the FEIS.

46. Are you modeling a land/transportation growth system that will allow for the "orderly" expansion of the population by 250,000 new people in 20 years, and increasing the "efficient" movement of those people, and yet feel that there will be no positive or negative impact on cultural sites (increased use, overuse) for anything included as a potential TCP?

**Response:** The proposed project is not expected to affect historic cultural sites (see Section 5.10 of the FEIS). DTS, other government agencies, private developers, community groups, and environmental and historic preservation organizations must all work together to ensure protection of Oahu's valuable cultural resources.

47. Please elaborate on the reports you are relying on, the studies you have conducted, and the depth of your analysis.

**Response:** The project has consulted with the State Historic Preservation Division and the Office of Hawaiian Affairs on historic, archaeological and cultural issues. In addition, the project has organized a panel of cultural experts to determine whether the project would cause cultural impacts.

48. Are you saying that adopting the proposed land use/transportation policies stated in this document, will only keep us even with the current levels of congestion?

**Response:** The goal of the Refined LPA is to provide an attractive, affordable, dependable transportation option to the private automobile. The Refined LPA increases the people carrying

capacity throughout the primary corridor and preserves and improves the quality of life of Oahu's residents by improving transportation linkages within the primary corridor and between Kapiolani and the urban core. The regional transportation plan for Oahu (TOP 2025), which includes the Refined LPA as well as highway and other improvements, was developed to meet future travel needs between now and 2025. Since the TOP 2025 Plan is constrained by funding limitations, and environmental and policy considerations, the levels of congestion in the future will be worse than today, yet substantially better than if nothing was done.

49. What policies would get us ahead of the curve?

**Response:** Avoidance of additional congestion in the future would require a major shift of people out of autos, and/or substantial increases in taxes and relaxation of environmental constraints.

50. Please include those policies that would do so, even if they failed to make your "best-fit" alternatives list.

**Response:** See response to comment #49.

51. How would the different alternatives change the "paucity of bikeway facilities" that currently exists?

**Response:** The Refined LPA will not displace any existing bikeway facility, such as bike lanes, paths or routes. The bike lanes on University Avenue would be moved next to the curb due to the removal of on-street parking on this street. Where the In-Town BRT lane is curbside, cyclists would be allowed use of these lanes. Where the In-Town BRT lane is center-running, the project would try to establish 14-foot-wide curb lanes where bike lanes are not possible. In terms of future bikeway facilities, as identified in the Honolulu Bicycle Master Plan, the Refined LPA would not preclude any of the suggested projects. The Hawaii Bicycling League agreed that the Refined LPA would improve bicycle transportation within Honolulu.

52. How should reluctant bikers, such as those who have had vehicular-bicycle interactions (cars smashing into bikes), deal with multi-use lanes replacing dedicated lanes?

**Response:** The Refined LPA will not replace any existing or proposed dedicated bike lanes with multi-use lanes.

53. What is meant by the term "sense of permanence"?

**Response:** A "sense of permanence" refers to the ease with which a public investment, in this case the transit alignment, could be moved.

54. How much is the city willing to invest in dedicated bike lanes?

**Response:** The proposed project would provide the opportunity to provide new bike lanes, such as along South King Street.

55. Are bikers at risk of achieving a sense of impotence?

**Response:** This terminology refers to how the In-Town BRT would be permanently fixed along the selected alignment, which would provide a sense of permanence so that developers can confidently plan around the system. It has nothing to do with bicycle transportation.

56. How do you define "sprawl"?

Response: Urban "sprawl" is defined as dispersed development outside of compact village centers along highways and in the rural countryside.

57. What are three examples of existing sprawl on Oahu?

Response: Urban sprawl is a subjective term, but is typically defined as low-density residential development in greenfield areas with very few employment opportunities, other than commercial retail. Mililani, Waipio, and Makakou are examples of sprawl.

58. If sprawl does not exist on Oahu, how will any plan stop sprawl?

Response: Sprawl does exist and has the potential to spread. The State and the City and County of Honolulu have instituted land use policies that encourage growth in the Primary Urban Center and Kapolei, in part to minimize suburban sprawl and the associated costs of extending public infrastructure and services into presently undeveloped areas. An improved transit system could help to focus growth in a desired development pattern.

59. If sprawl does exist on Oahu, how specifically will any plan stop more sprawl from occurring?

Response: Land use policies and infrastructure development can be used to direct growth.

60. Please state how increasing the number of residents in Central Oahu by 35,000 and the number of residents elsewhere by 25,000 will contain sprawl?

Response: The number provided in the comment for "residents elsewhere" is not correct. It should be about 174,000.

61. If the first and second cities both grow rapidly, while growth elsewhere continues at its present rate, how is sprawl being contained?

Response: Comment does not appear to be relevant to the proposed project. The question might be better directed to the Department of Planning and Permitting.

62. Please list all successful efforts to contain sprawl on Oahu in the last 10 years.

Response: See response to comment #51.

63. What is meant by "growth-shaping opportunities"?

Response: Growth-shaping opportunities refers to the project's ability to influence development patterns in targeted areas surrounding the project.

64. Are there negative impacts sometimes associated with "growth-shaping"?

Response: Depending on one's perspective, any development could be viewed as having "negative impacts".

65. What are specific transit supportive local policies?

Response: Examples of potential transit-supportive local policies include the development of Kapolei as the "second city" and the redevelopment in Kakaako as medium to high density mixed uses.

66. What would be the geographic range of transit supportive local policies dealing with zoning issues?

Response: Changes to the Land Use Ordinance such as zoning, that could be implemented to complement the proposed project have yet to be determined.

67. What would be the geographic range of transit supportive local policies dealing with parking issues?

Response: Transit supportive parking policies include the City's Land Use Ordinance (LUO) and the PUC DP Update. The LUO covers the Island of Oahu, while the PUC DP Update addresses the Primary Urban Center.

68. What would be the geographic range of transit supportive local policies dealing with mixed-use issues?

Response: Changes to the Land Use Ordinance, such as zoning, that could be implemented to complement the proposed project have yet to be determined.

69. What would be the geographic range of transit supportive local policies dealing with permissive land use issues?

Response: See response to comment #68.

70. What would be the geographic range of transit supportive local policies dealing with variances?

Response: See response to comment #68.

71. What does "ripe for development" mean?

Response: The term refers to an area that has certain characteristics, such as zoning, infrastructure, vacant or underutilized parcels, and favorable market factors that allow for ease of development.

72. The following statement uses the term likely: "Among the findings and recommendations of the land use panel was the conclusions that without a major investment in a permanent fixed transit system, the desired growth pattern in the PUC would very likely not happen". Under what conditions could the desired growth pattern occur without an investment in a transit system?

Response: While the desired growth pattern could occur without the project, it is more likely to occur with the project.

73. What is meant by a "permanent fixed transit system"?

**Response:** A permanent fixed transit system is one that will not be moved. This will enable developers to proceed with their plans for transit-oriented development without worrying that the City would later shift the alignment.

74. What "appropriate implementation tools" are needed to discourage development?

**Response:** Typical implementation tools include zoning, urban growth boundaries, parking restrictions and infrastructure development.

75. What "appropriate implementation tools" are needed to prohibit development?

**Response:** Typical implementation tools include zoning, urban growth boundaries, parking restrictions and infrastructure development.

76. What specific development would be discouraged or prohibited?

**Response:** This is too broad a question. It depends on the specific locations.

77. Does "discouraged development" allow for variances?

**Response:** DTS does not control the granting of variances and therefore cannot predict how many variances will be issued.

78. Does "prohibited development" allow for variances?

**Response:** DTS does not control the granting of variances and therefore cannot predict how many variances will be issued.

79. How has the City government dealt with this issue in the past?

**Response:** Variances are handled on a case-by-case basis by the Department of Planning and Permitting and the City Council.

80. What is likely to change?

**Response:** There are no known plans to change the process of obtaining a variance.

81. Will new implementation tools protect prime agricultural lands?

**Response:** Yes. Policies such as zoning, urban growth boundaries, parking restrictions, and infrastructure implementation policies can help protect both agricultural and rural areas.

82. Will new implementation tools protect rural lands?

**Response:** See response to comment #81.

83. Will new implementation tools protect the community character of established communities?

**Response:** The character of existing neighborhoods can be protected by implementation tools described above.

84. What are the very specific in outlining the various ways the panel felt development could be discouraged?

**Response:** The land use panel was not formed to recommend policies to discourage or prohibit development. The panel was formed to identify factors that have led to development elsewhere.

85. What are the very specific in outlining the various ways the panel felt development could be prohibited?

**Response:** See response to comment #84.

86. What are the very specific in outlining the various ways the county should change existing ordinances so that undesired development could be discouraged?

**Response:** The issue of discouraging or prohibiting undesirable land use development or patterns is discussed in each of the development and sustainable community plans.

87. What are the very specific in outlining the various ways the county should change existing ordinances so that undesired development could be prohibited?

**Response:** The issue of discouraging or prohibiting undesirable land use development or patterns is discussed in each of the development and sustainable community plans.

88. What specifically did the panel mean by "This conclusion was conditioned upon a comprehensive transit/land use implementing strategy developed and managed by a strong land development implementation body"?

**Response:** The panel was referring to the need for an existing or new city department or agency that would take the lead in implementing transit-friendly development policies.

89. "Transportation and circulation are integral functions within a livable city. They should, therefore, be tightly integrated with land use management controls and policies." (5-8) What does "tightly integrated with land use management controls and policies" mean?

**Response:** This means that development of transportation infrastructure should be closely coordinated with land use plans and policies and vice versa.

90. What would happen if transportation and circulation were only strongly integrated?

**Response:** If transportation and circulation were strongly integrated, then a livable city is highly possible.

91. How does one measure degrees of integration?

**Response:** Integration is a subjective term and is not necessarily measurable.

92. Does "tightly integrated" mean that land use and transportation are dependent upon each other?

Response: The concept is that certain types and intensities of uses could benefit more than others from being near a transit station and vice versa, therefore transportation and land use policies and controls should reflect this.

93. If not, how tight could they be with each other?

Response: See response to comment #92.

94. If so, doesn't dependent utility require a joint EIS?

Response: See response to comment #92.

95. What exactly is a "livable city"?

Response: Livable community is a subjective term, but typically means safe, clean and attractive neighborhoods that are pedestrian friendly and well connected to transit and employment opportunities.

96. One that you can survive in?

Response: See response to comment #95.

97. Or one that you can have a life in?

Response: See response to comment #95.

98. This statement sounds like "we must build to be in compliance." How can you complete a fair, reasonable, balanced presentation, if the No-Build is disqualified before comments arrive?

Response: It is a federal requirement that all alternatives be treated in a balanced manner and the MIS/DEIS has been prepared to ensure that this "balanced treatment" requirement is met. A complete description and comparison of the No-Build Alternative, Transportation System Management (TSM) Alternative, and Bus Rapid Transit (BRT) Alternatives were discussed in the MIS/DEIS.

Even at this point in the process, there is no foregone conclusion that the BRT Alternative (Refined LPA) will be implemented. Until there is a completed Record of Decision (ROD) and Full Funding Grant Agreement (FFGA) with the FTA, the preferred alternative is not a certainty. After the ROD is issued, construction funding needs to be procured to actually implement the project.

99. What causes "continued pressure to urbanize outlying agricultural lands"?

Response: Pressure to urbanize agricultural lands comes from a lack of affordable urban lands on Oahu, growing population, and individual preferences for open space.

100. How do developments in the PUC have any effect on developments in agricultural areas?

Response: If growth can be accommodated in urban areas such as the PUC, it would reduce development pressure on open lands such as agricultural areas.

101. Are the development companies the same?

Response: Development companies for various projects can differ or be the same from project to project.

102. Can any on-shore ecosystem be impacted from the BRT Alternative?

Response: No adverse impacts are expected because the BRT proposes to use existing or proposed roads, and because the ecosystem is already heavily disturbed.

103. Will increased traffic, population, lights, urbanization have any possible impact on any native species?

Response: The State of Hawaii lists the Oahu population of the white tern as endangered. White terns are also federally protected by the Migratory Bird Treaty Act. White terns are well-adapted to urban environments, and no interaction with adults of this species is anticipated. The primary concern regarding white terns is to avoid disturbing their eggs, which are laid on bare tree branches. A survey of the project area will be conducted for white terns and their nests prior to final design. Sensitive trees and areas will also be monitored immediately prior to and/or during construction activities that involve tree relocation, removal, and/or trimming. All monitoring will be coordinated with the USFWS. DTS will also coordinate tree trimming with the Department of Parks and Recreation, which has standard procedures to avoid impacts to white terns and their eggs. These mitigation measures are included in Section 5.7 of the Final EIS.

No adverse project impacts on other State or federally listed, proposed, or candidate threatened or endangered species are expected because the project area is already heavily disturbed.

104. "Increasing transit patronage (with the BRT Alternative) would reduce the non-point source pollution created by automobiles." (5-59) How?

Response: Because this project and some other transportation projects are intended to enhance transit use and thereby reduce reliance on private vehicles, the cumulative effect of these planned projects would be to reduce pollution caused by automobiles over time.

105. While the percentage of people who take buses may rise, won't there be an actual rise in the number of actual people who drive cars?

Response: Yes, due to population growth.

106. How will that decrease water pollution?

Response: Fewer vehicles on the road will mean less oil and grease on the roads that become part of roadway runoff.

107. Isn't a major source of non-point-source pollution the results of stop-go?

Response: Yes.

108. Weren't "break pad wear and tear" what allowed federal monies to be used to study pollution in the Ala Wai Canal?

**Response:** Break pad wear and tear is suspected of generating metal wastes that can contaminate water bodies. Metals are known contaminants in the Ala Wai, which is an impaired water body. However, there is no direct causality between "break pad wear and tear" and federal funding for studies of the Ala Wai Canal, as the Ala Wai Canal contains many other contaminants.

109. How will increased bus use decrease vehicular npsp?

**Response:** Transit ridership is expected to increase and reduce VMT under the Refined LPA. Reductions in VMT are strongly correlated with reductions in vehicular NPSP, as a result of lower vehicular emissions.

110. "Overall, the island VMT under the TSM Alternative is projected to be slightly lower than the VMT under the No-Build Alternative because many travelers would shift from passenger vehicles to buses due to improved transit service." (5-62) What are the supporting and opposing documents/studies that would indicate people make decisions based on transit quality?

**Response:** The OMOPO travel demand models used in the Primary Corridor Transportation Project were developed using household surveys of thousands of Oahu residents that document their actual travel patterns and characteristics. The mode choice models use the observed relationships between relative travel time, frequency of service, and need for transferring (i.e., quality of transit service) compared to travel time by auto, and socioeconomic characteristics of the traveler (e.g., auto ownership) to forecast future ridership on transit. These models are consistent with forecasting procedures required by FTA and used throughout the U.S.

111. Will the number of vehicles rise under this scenario?

**Response:** If you are referring to an increase in the number of private automobiles, in the TSM, No-Build and BRT Alternatives, all these would have a greater number of vehicles in 2025 compared to today due to projected growth in population. The Refined LPA (BRT Alternative) would divert the most drivers out of autos and therefore result in the least auto growth.

112. "This estimate assumes that hybrid in-town BRT vehicles would be used." (5-63) Would these hybrids be LEVs, SLEVs (equivalent to the Prius), or ZEV?

**Response:** Hybrid vehicles are defined as having two sources of motive energy on board, and having the ability to partially or fully drive the vehicle's wheels. Bus manufacturers have developed vehicles that fit this definition, but the terms LEV, SLEV, and ZEV have not been applied by bus manufacturers to the technology.

113. "Furthermore, an all-electric system would require approximately 11,300 kilowatts per day, which can be provided within the reserve capacity of existing power plants according to Hawaiian Electric Company." (5-63) What options exist for the use of fuel cells?

**Response:** The FEIS describes two technologies that are currently under consideration: the Embedded Plate Technology (EPT) and a Hybrid-Electric Propulsion system. The FEIS has been prepared to permit either option to be selected later in the project development process by reflecting the "worst case" impacts of the two technologies. The FEIS does not preclude an alternative technology such as fuel cells to be considered in the future. Although the hybrid-electric technology has been chosen for the initial fleet of In-Town BRT transit vehicles, it is anticipated that the initial In-Town fleet would be replaced in about 2011 with EPT if it is service

proven. If fuel cells or other new technologies have proven themselves by that point in time then they will be considered along with EPT for the In-Town BRT, and the rest of the bus system.

114. Can the electricity needed be generated directly from the sun, through photovoltaics, for example, on the roofs of bus stops?

**Response:** The electricity required to power a transit vehicle currently cannot be generated from the sun. Photovoltaic cells have been used to generate energy to provide power for items that require a lesser amount of power such as telephones, street signs, etc.

115. What cities use such systems?

**Response:** DTS does not know of any city that uses photovoltaic cells to energize transit vehicles.

116. What is a "transit oriented development"? (5-81)

**Response:** "Transit-oriented development", or TOD, refers to a land use pattern that contains a wide mix of activities that promote walking and transit use, as opposed to a land use pattern that forces people to be more auto dependent. TODs are ideal along a high capacity transit system.

117. Are "transit oriented development," as referred to on page 5-81, desirable?

**Response:** Transit-oriented development is desirable in that it provides a life-style choice which is not available by-and-large today for those who would prefer it.

118. What are some drawbacks of "transit oriented development"?

**Response:** While transit-oriented development can provide a host of benefits, such as better air quality, promotion of a healthier lifestyle, etc., some people may opt not to live in a denser, more urban type of environment associated with TOD, and therefore judge it as having drawbacks.

119. Can all possible proposed developments in the Urban Core and Kapolei be viewed as positive?

**Response:** The merits of any development would have to be judged independently.

120. If this proposal generates another plan for a "360-degree rotating gondola" and "tight show on the clouds" would the development be good?

**Response:** The merits of any development would have to be judged independently.

121. Does this mean that desired concentration growth patterns are more difficult in rural, less populated areas than in high-rise areas?

**Response:** There is an island-wide goal to maintain the rural areas. Concentrating growth in the PUC and Kapolei is consistent with this goal.

122. What large landowners would most benefit from this approach?

**Response:** It is unclear what the comment means by "approach". In any event, the comment does not appear to be relevant to the proposed project.



123. *Will transit centers increase the value of nearby property?*

Response: It is possible for transit centers to increase the value of nearby property because they improve access to transportation services.

124. *What does "people-carrying capacity" mean?*

Response: The number of persons traveling in vehicles (buses, autos, and trucks) that a section of roadway or guideway can accommodate in a given time period, usually a day or an hour.

125. *Is it socially desirable to increase the "people-carrying capacity"?*

Response: It is environmentally desirable to increase "people carrying capacity" by encouraging a shift to higher occupancy vehicles rather than widening existing roadways and building new roadways.

126. *What are some reasons that communities might want to lower "people-carrying capacity"?*

Response: They don't have constraints to widening roads.

127. *Does "help focus growth along the alignment" mean that the City will oppose growth elsewhere? If not, how will this contain sprawl?*

Response: In order to obtain support from the City for any type of development it must be consistent with the applicable development or sustainable plan.

128. *When did the balance exist?*

Response: What was meant by the statement provided, was to encourage greater use of transit, pedestrian and bicycle modes so that there is not as great a dependency on autos for mobility.

129. *What made it go out of balance?*

Response: Previous transportation policies and investments that encouraged private automobile use at the expense of other modes.

130. *How likely is it that the balance can come back?*

Response: With this project greater use of transit, pedestrian and bicycle modes is expected.

131. *What is the proper balance between pedestrian and bicycle modes?*

Response: Pedestrians and bicycles are not competing modes.

132. *Should balance be a prime objective only within the corridor?*

Response: Greater use of transit, pedestrian and bicycle modes is desirable throughout Oahu.

133. *What are the levels of balance and who determines them?*

Response: The Refined LPA was developed with extensive public input, selected by the City Council, and incorporated into the OMPD TOP 2025 Plan.

134. *How is balance measured?*

Response: Balance is measured in terms of improvement over the No-Build situation.

135. *What is the relationship between FCTP, ORTP and the OMPD CAC?*

Response: The Primary Corridor Transportation Project (PCTP) is the transit element of the financially constrained 2025 Oahu Regional Transportation Plan (ORTP or TOP 2025) and was recommended by the Oahu Metropolitan Planning Organization Citizens Advisory Committee (CAC) for funding.

136. *Will the plan increase or decrease compliance with the ADA?*

Response: Improvements that are part of the Refined LPA will increase compliance with ADA requirements.

137. *How will mauka-makai bicycle trips be affected?*

Response: The Refined LPA will not displace any existing or proposed bikeway facility, such as bike lanes, paths or routes. However, the bike lanes on University Avenue would be moved next to the curb due to the removal of on-street parking on this street. The proposed In-Town BRT will not impede mauka-makai trips by bicyclists, pedestrians, or vehicles.

138. *Which alternative will allow greater shipment of bicycles?*

Response: The Refined LPA has the most buses and since each bus will have bike racks it could transport the most bicycles.

139. *How many bicycles could be transported each day?*

Response: Assuming an average trip length of 5 miles, up to approximately 33,000 bicycles per day.

140. *Will the amount of green space in the PUC go up or down?*

Response: The amount of "green space" within the Primary Urban Center will depend on the aggregate development projects, and government plans for open space.

141. *By how much?*

Response: See response to comment #140.

142. *The boundaries used in various reports do not line up. Why?*

**Response:** The study areas as shown in the March 1999 Islandwide Mobility Concept Plan (March 1999) and the MIS/DEIS are not meant to be taken literally, but rather as a broad indication of the area under study.

143. *Are the following locations inside the boundary: (a) Waimanalo Gulch; (b) Ford Island; (c) Hickam Air Force Base? The Parsons Brinckerhoff Report (3/99) includes Iroquois Point, Diamond Head, and the Kehala Mall. The DEIS does not. Was the boundary changed after the EISPN was published?*

**Response:** The boundaries of the study areas as shown in the March 1999 Islandwide Mobility Concept Plan (March 1999) the EISPN and the MIS/DEIS are not meant to be taken literally.

144. *Is the current scope of the project different than that proposed in the EISPN?*

**Response:** Since the PCTP, Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) (August 2000) was distributed, and as a result of continuous public involvement and the working groups, the Bus Rapid Transit (BRT) Alternative has been refined. The Refined LPA is the BRT Alternative discussed in the EISPN and MIS/DEIS with the following major refinements:

1. Replacing the Kaonohi Street and Radford Drive ramps with a Luapele Drive ramp;
2. Adding a new In-Town BRT branch (Kakaako Makai Branch) running from the Iwilei Transit Center through downtown Honolulu, the Aloha Tower Marketplace, and Kakaako Makai enroute to Waikiki; and
3. Retooling a short section of the University of Hawaii-Manoa (UH-Manoa) In-Town BRT alignment from Ward Avenue to Pensacola Street.

In addition, a portion of the former Kakaako/Waikiki Branch (now being referred to as the Kakaako Mauka Branch) was rerouted from Richards Street to Bishop and Alaiea Streets. Two new transit stops would be added to the Kakaako Mauka Branch. The Koko Head direction stop would be located on the Ewa side of Bishop Street between Queen Street and Ala Moana Boulevard; the Ewa bound transit stop would be located on the Koko Head side of Alaiea Street, between Queen Street and Ala Moana Boulevard. Associated with the Luapele Drive ramp is the relocation of the Pearl City/Alaiea Transit Center to Aloha Stadium. The Kakaako Makai Branch would include four transit stops: Aloha Tower, Fort Armstrong, Coral, and Kewalo Basin. The rerouting of a portion of the UH-Manoa alignment to Pensacola Street would create a new transit stop along South King Street at Pensacola Street.

145. *Why is part of Memorial Bay included in the Corridor?*

**Response:** If you are referring to the figures depicting the Primary Transportation Corridor Study Area (Figures 1.0-1 and others), the marked area should not be taken literally. The figure is intended as a guide to help readers understand roughly where the Primary Transportation Corridor is.

146. *Is both the University of Hawaii and Chaminda University in the PCTP?*

**Response:** The study area includes both the University of Hawaii at Manoa and Chaminda University.

147. *How do we know that "sprawl development does not support itself"?*

**Response:** The statement provided, "sprawl development does not support itself" is not in the MIS/DEIS. Since this statement was not in the MIS/DEIS, we do not know what is meant by "support itself". This could mean many things.

148. *Do residents in "older, established neighborhoods" subsidize other neighborhoods and proposed developments?*

**Response:** The statement, "older, established neighborhoods" is not in the MIS/DEIS. Nevertheless, the question of whether one neighborhood subsidizes another is not relevant to the purposes of this EIS.

149. *Do all residents initially subsidize new projects or do developers pay for needed infrastructure to connect their proposed developments to the existing water, sewer, gas, electric and telephone grids?*

**Response:** The comment does not appear to be relevant to the proposed project. The cost of new residences typically includes the cost of much of infrastructure needed for the development.

150. *Which developments lack community character on Oahu?*

**Response:** It is not germane to this EIS to identify which developments lack community character.

151. *If there are no such communities, why make the statement?*

**Response:** See response to comment #150.

152. *How will building multiple "super-blocks" make better community character and a sense of place?*

**Response:** Building on super-blocks will not in and of itself produce the desired results. Having larger parcels to develop provides enhanced opportunities to develop urban villages or transit-oriented developments where mixed-use neighborhoods would be connected by transit, walking, or cycling.

153. *Since the development of the H-1, how has population been driven out of Honolulu?*

**Response:** In the last 20 years the population of Leeward and Central Oahu has increased substantially, whereas the population in the urban core has remained flat.

154. *Did the population level fall within the PCTP?*

**Response:** See response to comment #153.

155. *Do "big box stores" exist because of freeway ramps or governmental policy that encourages large foreign-owned stores at the expense of local mom-and-pop stores?*

**Response:** The increase in the number of and market share of so called "big box" retailers have more to do with consumer preferences and other market factors rather than the location of freeway ramps.

156. **How does Saint Louis Heights and Pacific Palisades coincide or differ from the statement: "The vision for Honolulu neighborhoods includes a pleasant mix of small businesses, churches, schools, and locally owned and operated businesses within walking or biking distance of residences or connected by neighborhood circulators?"**

**Response:** The goal expressed in the vision statement for neighborhoods is the same for both Pacific Palisades and St. Louis Heights.

157. **What would a map of a reversible ramp look like?**

**Response:** See Preliminary Engineering drawings for Luapele Ramp in Appendix B, Figures R-36 through R-38.

158. **Let's define the following ratios: 1) Pedestrian-Ratio = cost of Facilities to accommodate pedestrians divided by total new infrastructure cost; 2) Bicycle-Ratio = cost of Facilities to accommodate bicycles divided by total new infrastructure cost. What is the Pedestrian-Ratio and the Bicycle-Ratio for each Alternative?**

**Response:** Only the Refined LPA includes sidewalk improvements along the In-Town BRT alignment to improve access to BRT stops. A comparison between alternatives is therefore not possible.

159. **How will the adoption of one of these Alternatives have any effect on protection of primary agricultural land?**

**Response:** One of the project benefits will be to reinforce directed development, thereby focusing growth in urban areas while simultaneously relieving development pressure on agricultural lands.

160. **What does "sustainable" mean? "The Mobility Concept Plan ... it is not only sustainable over the long run, but absolutely necessary to shape an economically robust future for Oahu." (Parsons Brinckerhoff -399, page IV).**

**Response:** Sustainable development refers to the preservation of natural resources through recycling of materials and the efficient use of land so as to improve and protect the quality of the environment, while enhancing the quality of life and well-being of residents.

161. **How will the BRT Alternative enable the C&CH to "keep the country country"?**

**Response:** The Refined LPA would focus transit improvements in the primary corridor so as to reinforce and support growth in a desired development pattern.

162. **How will the BRT Alternative enable the C&CH to "Make Honolulu and Kapolei more attractive, livable cities"?**

**Response:** The Refined LPA would provide an improved transportation linkage between Kapolei and the urban core, offering reasonable and dependable travel times between both regions.

163. **How will the BRT Alternative enable the C&CH to "Reclaim the waterfront"?**

**Response:** The Refined LPA would complement the Makai Area Plan (August 1998), which seeks to develop the Kakaako waterfront. A key element of any development plan is good transportation. The Refined LPA would provide better public access to the waterfront, making it attractive to developers. According to the Makai Area Plan, the overall vision is "to create an active area through a variety of new developments, including an expansive waterfront park, maritime uses along the harbor, restaurants, seafood markets and entertainment along Kewalo Basin, a children's museum and a theater for performing arts, a world-class aquarium, and commercial development of the interior areas."

164. **How will the BRT Alternative enable the C&CH to create "A healthy and multi-faceted visitor industry"?**

**Response:** The statement provided, "A healthy and multi-faceted visitor industry" is not in the MISDEIS. The Refined LPA will assist in providing an attractive environment for visitors by substantially reducing the number of City diesel buses operating in Waikiki.

165. **What is the relationship between the "21st Century Oahu Vision Program," the "Oahu Trans 2K," the "Islandwide Mobility Concept," and the PCTP?**

**Response:** Oahu Trans 2K is the public involvement program for the Primary Corridor Transportation Project (PCTP). The 21<sup>st</sup> Century Vision for Oahu is a program that brings decisions on capital improvements to the community level. Both programs are organized by the City and County of Honolulu. The Islandwide Mobility Concept Plan sets the context for the transit improvements in the PCTP.

166. **What is meant by "mobility options"?**

**Response:** The term "mobility options" means providing people with modal choices (e.g., auto, bus, bicycle, carpool, etc.).

167. **When older neighborhoods are "revitalized," new families come in. The price of property rises. Some of the older residents are then financially squeezed. Property taxes rise. People either leave or cope. Is this what is meant by the following statement: "Achieving this vision means encouraging redevelopment of older urban neighborhoods by improving the quality of life of these areas to attract new residents." The new residents will enjoy a high quality of life while the existing residents on fixed income will move out.**

**Response:** The statement provided is not exactly the same as what was written at the bottom of page 1-10 of the MISDEIS. The statement, "improving the quality of life" is not stated in this section. What is stated is that the "PUC DP (Development Plan) introduces the concept of higher-density housing supported by extensive urban amenities", which could include a BRT system. The statement contained in the MISDEIS did not intend to suggest, nor does the impact analysis of the EIS conclude, that the proposed project would cause existing residents in the PUC to move out.

168. **A transit-based travel option, with frequent express service to and from Downtown and connections to strategically located transit centers along the way, is a necessary transportation element to link Oahu's first and second cities, and will encourage their coordinated growth."**

Isn't it more likely that their coordinated growth will be related to the fact that the two cities have the same county council and mayor?

Response: The fact that the Primary Urban Center and the Secondary Urban Center in Ewa are under the jurisdiction of the City and County of Honolulu will help in coordinating their development. The Refined LPA will facilitate planned development to these areas by providing good transit linkages.

169. In general, the areas that would be converted to transitways are existing general purpose lanes, shoulders and medians. The BRT Alternative incorporates a very high level of transit service to draw people out of single-occupant automobiles. Why not include a much higher use of buses, as suggested by some of the commenters on the EISP?

Response: The Refined LPA does reflect a much higher use of buses. The Refined LPA reflects 36 percent more seats being provided than with the No-Build Alternative.

170. Have any transit systems in the US experienced what is suggested by the following statement: "An efficient transit system should cause the demand for parking to decline within urban Honolulu. New neighborhood off-street parking facilities could be developed if community-based planning determined it was needed."

Response: Yes. Probably the most dramatic examples are New York City, Boston, Atlanta, and San Francisco.

171. What are bicycle mitigation measures? Environmental mitigation considerations, including mitigation for loss of on-street parking, replacement of loading zones, and coordination of details of the bicycle mitigation measures with cyclists.

Response: Where the In-Town BRT lane is curbside, cyclists would be allowed use of these extra wide lanes, which is an improvement over the existing condition. Where the In-Town BRT lane is in the median, the project will try to establish 14-foot-wide curb lanes where bike lanes are not possible.

172. Kalaupokalani/Kapilani (Convention Center) Substation Appendix B-TRM-7 What is the anticipated size of the substation (measurements and capacity)? Will the substation be enclosed? Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout? Will the lines to and from the substation be underground or overhead? What HECO substation will this substation be attached to? What are the expected EMF readings at the transit stop?

Response: Since publication of the MIS/DEIS the potential locations for traction power supply stations (TPSS) have been refined. The currently proposed sites are shown in the FEIS (Appendix B), and the potential impacts are discussed in Chapter 5.

A typical self-contained TPSS facility would be an enclosed structure with dimensions of approximately 35 feet long by 15 feet wide by 10 feet high. Many would be located inside other buildings such as parking structures. The substations will not have photovoltaic cells on the roof. In the event of a blackout, the on-board batteries of the embedded plate vehicle would be a temporary source of power. The traction power supply system will connect to more than one HECO substation so that in the event of a blackout of one substation the system will not have to be shut down. Also, underground ducts will supply HECO power to each TPSS, and provide feed

and return circuits between each TPSS and the adjacent segments of the contact system. The HECO substations that each TPSS will be attached to will be determined after coordinating with HECO. The expected EMF readings at the transit stop are zero.

173. Kapiolani/Hoawa Substation. Appendix B-TRM-7. What is the anticipated size of the substation (measurements and capacity)? Will the substation be enclosed? Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout? Will the lines to and from the substation be underground or overhead? What HECO substation will this substation be attached to? What are the expected EMF readings at the transit stop?

Response: See response to comment #172.

174. Kulei/University Substation. Appendix B-TRM-8. What is the anticipated size of the substation (measurements and capacity)? Will the substation be enclosed? Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout? Will the lines to and from the substation be underground or overhead? What HECO substation will this substation be attached to? What are the expected EMF readings at the transit stop?

Response: See response to comment #172.

175. University (between Dole/McCall) Substation. Appendix B-TRM-9. What is the anticipated size of the substation (measurements and capacity)? Will the substation be enclosed? Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout? Will the lines to and from the substation be underground or overhead? What HECO substation will this substation be attached to? What are the expected EMF readings at the transit stop?

Response: See response to comment #172.

176. Aloha Tower Substation. Appendix B-TRM-10. What is the anticipated size of the substation (measurements and capacity)? Will the substation be enclosed? Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout? Will the lines to and from the substation be underground or overhead? What HECO substation will this substation be attached to? What are the expected EMF readings at the transit stop?

Response: See response to comment #172.

177. Kamakee/Auahi Substation. Appendix B-TRM-11. What is the anticipated size of the substation (measurements and capacity)? Will the substation be enclosed? Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout? Will the lines to and from the substation be underground or overhead? What HECO substation will this substation be attached to? What are the expected EMF readings at the transit stop?

Response: See response to comment #172.

178. Ala Moana (near Hobron) Substation. Appendix B-TRM-13. What is the anticipated size of the substation (measurements and capacity)? Will the substation be enclosed? Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout? Will the lines to and from the substation be underground or overhead? What HECO substation will this substation be attached to? What are the expected EMF readings at the transit stop?

Response: See response to comment #172.

179. Kalia Road/Maluhia Substation, Appendix B-TRM-13 What is the anticipated size of the substation (measurements and capacity)? Will the substation be enclosed? Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout? Will the lines to and from the substation be underground or overhead? What HECO substation will this substation be attached to? What are the expected EMF readings at the transit stop?

Response: See response to comment #172.

180. Kuhio/Seaside Substation, Appendix B-TRM-14 What is the anticipated size of the substation (measurements and capacity)? Will the substation be enclosed? Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout? Will the lines to and from the substation be underground or overhead? What HECO substation will this substation be attached to? What are the expected EMF readings at the transit stop?

Response: See response to comment #172.

181. Kalekua/Duke's Substation, Appendix B-TRM-14 What is the anticipated size of the substation (measurements and capacity)? Will the substation be enclosed? Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout? Will the lines to and from the substation be underground or overhead? What HECO substation will this substation be attached to? What are the expected EMF readings at the transit stop?

Response: See response to comment #172.

182. Kelakaue/Uluru (Waikiki Beach) Substation, Appendix B-TRM-14 What is the anticipated size of the substation (measurements and capacity)? Will the substation be enclosed? Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout? Will the lines to and from the substation be underground or overhead? What HECO substation will this substation be attached to? What are the expected EMF readings at the transit stop?

Response: See response to comment #172.

183. Kealahou/Kuhio Substation, Appendix B-TRM-14 What is the anticipated size of the substation (measurements and capacity)? Will the substation be enclosed? Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout? Will the lines to and from the substation be underground or overhead? What HECO substation will this substation be attached to? What are the expected EMF readings at the transit stop?

Response: See response to comment #172.

184. Kuhio/Kapahulu (Kapalani Park) Substation, Appendix B-TRM-14 What is the anticipated size of the substation (measurements and capacity)? Will the substation be enclosed? Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout? Will the lines to and from the substation be underground or overhead? What HECO substation will this substation be attached to? What are the expected EMF readings at the transit stop?

Response: See response to comment #172.

185. McNeil/Dillingham Substation, Appendix B-TRM-2 Appendix B-TRM-14 What is the anticipated size of the substation (measurements and capacity)? Will the substation be enclosed? Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout? Will the lines to and from the substation be underground or overhead? What HECO substation will this substation be attached to? What are the expected EMF readings at the transit stop?

Response: See response to comment #172.

186. Dillingham (Honolulu Community College across from Aiea) Substation, Appendix B-TRM-3 What is the anticipated size of the substation (measurements and capacity)? Will the substation be enclosed? Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout? Will the lines to and from the substation be underground or overhead? What HECO substation will this substation be attached to? What are the expected EMF readings at the transit stop?

Response: See response to comment #172.

187. Iwilei Rd. extension/Kaahali Substation, Appendix B-TRM-3 What is the anticipated size of the substation (measurements and capacity)? Will the substation be enclosed? Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout? Will the lines to and from the substation be underground or overhead? What HECO substation will this substation be attached to? What are the expected EMF readings at the transit stop?

Response: See response to comment #172.

188. Kekaulike/Hotel Substation, Appendix B-TRM-4 What is the anticipated size of the substation (measurements and capacity)? Will the substation be enclosed? Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout? Will the lines to and from the substation be underground or overhead? What HECO substation will this substation be attached to? What are the expected EMF readings at the transit stop?

Response: See response to comment #172.

189. Bishop/Hotel (Union Mall) Substation, Appendix B-TRM-4 What is the anticipated size of the substation (measurements and capacity)? Will the substation be enclosed? Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout? Will the lines to and from the substation be underground or overhead? What HECO substation will this substation be attached to? What are the expected EMF readings at the transit stop?

Response: See response to comment #172.

190. King/Mūliani (Iolani Palace) Substation, Appendix B-TRM-4 What is the anticipated size of the substation (measurements and capacity)? Will the substation be enclosed? Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout? Will the lines to and from the substation be underground or overhead? What HECO substation will this substation be attached to? What are the expected EMF readings at the transit stop?

Response: See response to comment #172.

191. King/Cooke Substation. Appendix B-TRM-5 What is the anticipated size of the substation (measurements and capacity)? Will the substation be enclosed? Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout? Will the lines to and from the substation be underground or overhead? What HECO substation will this substation be attached to? What are the expected EMF readings at the transit stop?

Response: See response to comment #172.

192. Pensacola/Kaplan Substation. Appendix B-TRM-6 What is the anticipated size of the substation (measurements and capacity)? Will the substation be enclosed? Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout? Will the lines to and from the substation be underground or overhead? What HECO substation will this substation be attached to? What are the expected EMF readings at the transit stop?

Response: See response to comment #172.

193. Kaplan/Keesumoku Substation. Appendix B-TRM-6 What is the anticipated size of the substation (measurements and capacity)? Will the substation be enclosed? Will the substation have photovoltaic cells on the roof, so that mass transit can work in the event of a blackout? Will the lines to and from the substation be underground or overhead? What HECO substation will this substation be attached to? What are the expected EMF readings at the transit stop?

Response: See response to comment #172.

194. What currently exists at the Iwalei Transit Center / Park-and-Ride Site?

Response: The Iwalei Transit Center would be located at the former ORAL property, which contains three buildings with four businesses.

195. Has the Neighborhood Board taken a position on use of the site?

Response: The Downtown Neighborhood Board took a position in October 2000 supporting the Bus Rapid Transit Project which includes the proposed Iwalei Transit Center.

196. Is the proposed site listed in the first volume of the PCTP DEIS?

Response: Yes.

197. What currently exists at the Middle Street Transit Center / Park-and-Ride Site?

Response: The transit center/maintenance facility at Middle Street would be located just makai of the existing Kaihi-Palana bus maintenance facility. Current uses consist of nine industrial/retail businesses and a used car dealership.

198. Has the Neighborhood Board taken a position on use of the site?

Response: The Kaihi Neighborhood Board is supportive of the location of the Middle Street Transit Center/Park and Ride.

199. Is the proposed site listed in the first volume of the PCTP DEIS?

Response: Yes.

200. Why has the public presentations heavily favored the BRT choice over the No-Build and other transportation system management options.

Response: The public presentations attempted to provide a balanced explanation of the relative beneficial and detrimental impacts of each of the alternatives. It may have appeared that the presentation favored the BRT Alternative only because it was found to have the most beneficial impacts.

201. How can a fast-track approach get with community consensus?

Response: Public outreach has been on-going since the start of the PCTP. The project began with public outreach in 1998, the MISDEIS was issued in August 2000, and the Locally Preferred Alternative (LPA) was selected by the City Council in November 2000.

Input from the public has been critical in establishing consensus on key issues and developing and evaluating alternative transportation solutions. The development and refinement of the three alternatives discussed in the MISDEIS was the result of public input.

Public outreach began with four rounds of Oahu Trans 2K public workshops attended by a total of 1,250 individuals and resulting in the development of the Islandwide Mobility Concept Plan, an important document that integrated public input into transportation goals and objectives for the island. Meetings were held with more than 100 governmental agencies, elected officials, businesses, and business, community and civic organizations to present elements of the Islandwide Mobility Concept Plan and gather information and comments.

In addition, information about the project and public input was solicited through the following: a project website was established and used to disseminate information, a project hotline was established to provide information on the public workshops and to solicit information, and a total of five tabloid-style Progress Reports were distributed to the public periodically with information on the latest status of the project.

The public also had the opportunity to provide input on the various alternatives at a series of four City Council Transportation Committee Meetings prior to selection of the Locally Preferred Alternative (LPA). The Honolulu City Council considered the three main alternatives and also had the option of considering additional alternatives. On November 29, 2000, the City Council selected the BRT Alternative as the LPA at a Special Council Meeting called for that purpose. The LPA was selected after considering cost, ridership, end service to communities, construction impacts, transportation impacts, environmental impacts, travel-time savings, the financial plan, and land use compatibility.

The public was given an opportunity to comment on the Environmental Impact Statement Preparation Notice (EISPN) and the Notice of Intent to Prepare an EIS (NOI). The public provided comments on the MISDEIS during a 45-day review period. These comments are responded to in this FEIS.

Mr. Henry Curtis  
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During the FEIS phase public involvement continued through working groups in five subareas along the primary corridor. A Round 5 public meeting was held as were numerous presentations to Neighborhood Boards and other groups.

Even after the NEPA process has concluded and the ROD has been issued, public involvement will continue in areas requiring further development. These areas include: transit centers, transit stops, joint development, streetscapes, landscaping, street tree master plan, station location and design studies, aesthetic design of vehicles, ITS and particulars of the ticketing system.

202. *How does the Major Investment Study analyze economic analysis on alternative modes of transportation and its impact on private transportation system?*

**Response:** Chapter 5 of the FEIS discusses the impacts of the Refined LPA on private transportation providers. The travel market served by private operators such as taxis, shuttles, etc., is distinctly different from that serviced by the Refined LPA. The services provided by private operators would still be needed even with implementation of the Refined LPA.

203. *Has DTS maximized the efficiency of its current bus system?*

**Response:** DTS has received several annual awards from the American Public Transit Association including in 2000 for operating the most efficient transit system among all other large bus systems in the U.S.

204. *What will be the business impact due to the loss of loading zones?*

**Response:** Through community outreach efforts including working with members of the Hawaii Transportation Association which represents private freight and passenger carriers, the subarea Working Groups, the Waikiki Improvement Association, and others, the City has developed a plan which minimizes direct impacts on passenger and freight loading zones, and, in the event of unavoidable adverse impacts, identifies alternate loading localities for all businesses along the BRT route. There will not be any measurable impact on businesses due to the loss of loading zones.

205. *Hawaii is the home to a large number of endangered and threatened species. While any given project can minimize the loss of species, the gradual, incremental, expansion of population into remote regions CAN lead to a loss of habitat. Population growth, increased tourism, conversion of open areas to urban growth, and expansion of transportation (allowing easier access to areas) CAN lead to loss of critical habitat. What precautions have been taken such that the nearby intertwined land use/transportation planning approach will not lead to critical losses in habitat? Please be specific. What studies were reviewed? What people were interviewed? How was the analysis completed? What new analysis was done? What are the credentials of the people who did the analysis for the EIS?*

**Response:** This project does not provide access to areas that are expected to be designated as critical habitat; therefore, no new studies or analyses were conducted to review critical habitat. Written coordination with the USFWS on endangered species (two letters in May 1999) is documented in the MISDEIS. DTS has conducted interagency coordination with the State Department of Land and Natural Resources Division of Forestry and Wildlife (DLNR-DOFAW), as well as with USFWS. Population growth is expected regardless of whether or not the PCTP is implemented. However, the PCTP would help direct growth to areas that are slated for

Mr. Henry Curtis  
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development, thereby protecting other areas (such as potential critical habitat) from development pressure. Please refer to the List of Preparers in the FEIS for the credentials of those involved in preparing the document.

206. *Please enclose a full bibliography.*

**Response:** The FEIS includes a bibliography.

207. *Please enclose a full list of terminology.*

**Response:** The FEIS includes a glossary of terminology.

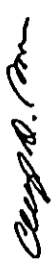
208. *What are the terms, conditions, and requirements of federal funding for this project?*

**Response:** Chapter 6 of the FEIS provides a detailed presentation of the proposed financial plan for the project, including each of the proposed federal funding sources. It includes a description of the federal funding source, the annual revenue amounts authorized and/or requested by source, terms, conditions, and requirements of federal funding sources.

209. *At the first PCTP/Oahu Trans 2K town meeting we attended, you asked, "so what would you like at your train station?" Did you ever find out the answer to that question?*

**Response:** Public suggestions included: parking facilities for transit riders, a daycare facility, wheelchair access, restrooms, bike-and-ride lots, color schemes to match street facades, color-coded transit transfer information, maps and bus schedules, public telephones, trash receptacles, and adequate lighting.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,  
  
CHERYL D. SOON  
Director



**MASONS UNION**  
 Local #1 of Hawaii, IUBAC • Local #630, OP & CMIA, AFL-CIO  
 2251 North School Street • Honolulu, Hawaii 96819  
 Ph: (808) 841-0491 • Fax: (808) 847-4782



November 14, 2000

*Transportation Committee  
 Special Meeting*

*Mr. Chairman and Members of the Department of Transportation Committee*

**TESTIMONY IN SUPPORT OF THE BUS RAPID TRANSIT**

My name is Allan Los Banos and I am here on behalf of Hawaii Masons Unions Local #1 and Local #630, and its members.

We are in support of the BUS RAPID TRANSIT Project.

This project plays a role in the future of Honolulu and its people. It also provides a solution to the ever growing traffic and commuting problems. This is something that must be addressed now while Honolulu still has the Federal funding capabilities.

For the construction industry, this project will provide the much needed JOBS for Hawaii's workers.

The present economy is still down for the construction industry. This project will provide a BOOST IN THE ECONOMY through the jobs and tax revenues generated. Now is also the time to build since it is a buyers' market. The cost of building now is more advantageous for the owners. Do you remember H-3? It had an original price tag of \$38 million about 30 years ago. The delays because of litigation and political bantering caused the H-3 to be one of the highest costing highways in the nation. The final price tag is over \$1 billion.

Please get this project on line.

Respectfully,

Allan Los Banos, Jr.  
 Promotional Specialist

DEPARTMENT OF TRANSPORTATION SERVICES

**CITY AND COUNTY OF HONOLULU**

650 SOUTH KING STREET, 3RD FLOOR  
 HONOLULU, HAWAII 96813  
 Phone: (808) 523-4329 • Fax: (808) 523-4700 • Internet: www.ci.honolulu.hi.us



JEREMY HARRIS  
 MAYOR

CHERYL D. SOON  
 DIRECTOR

GEORGE "KEO" MIYAMOTO  
 DEPUTY DIRECTOR

November 13, 2002

Mr. Allan Los Banos, Jr.  
 Promotional Specialist  
 Masons Union  
 Local #1 of Hawaii, IUBAC, Local #630, OP & CMIA, AFL-CIO  
 2251 North School Street  
 Honolulu, Hawaii 96819

Dear Mr. Los Banos:

Subject: Primary Corridor Transportation Project

This is in response to your November 14, 2000 letter and your oral testimony at the November 14, 2000 Special Transportation Committee Meeting regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. We are in support of the BUS RAPID TRANSIT Project.

Response: Comment noted. It states the commenter's preference for an LPA.

2. For the construction industry, this project will provide the much needed JOBS for Hawaii's workers.

Response: Comment noted. It is a statement of opinion.

3. The present economy is still down for the construction industry. This project will provide a boost in the economy through the jobs and tax revenues generated. Now is also the time to build since it is a buyers' market.

Response: Comment noted. It is a statement of opinion.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
 Director





**NA LEO POHAI**  
The Public Policy Affiliate of The Outdoor Circle

October 26, 2000

Council Member Duke Bainum, Chair  
and Council Member Rene Mansho, Vice-Chair  
and Members  
Transportation Committee  
Honolulu City Council  
Honolulu, HI 96813

RE: Primary Corridor Transportation Project Communication D-674

Chair Bainum, Vice-Chair Mansho, and Members of the Committee:

Thank you very much for allowing me to speak this evening regarding the Primary Corridor Transportation Project. I am Mary Steiner, speaking on behalf of Na Leo Pohai, the public policy affiliate of The Outdoor Circle.

As you may know, The Outdoor Circle is responsible for planting many of the large, stately trees that beautify urban Honolulu. Throughout its history, the organization has planted thousands of trees and protected many thousands more from being butchered or destroyed. This legacy, Honolulu's urban forest, is worth protecting at all costs.

Chapter 5 of the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) is titled Environmental Analysis and Consequences. Subsection 7 discusses ecosystems and states very clearly that, "Some trees and shrubs would be removed or trimmed to allow the transit stops to be built or the roadway to be widened for the BRT Alternative." Concerning mitigation the document continues, "Mitigation would consist of revegetation and landscaping along the alignment where possible (emphasis mine). Although planting plans would not be prepared until later stages of final design, desirable locations for special landscaping treatment include areas where (1) existing landscaping has been lost; (2) substantial opportunities exist for enhancement of existing streetscapes; ..."

As the stewards of our street trees, we find this wholly unacceptable. Why would we be looking at "desirable locations for special landscaping treatment" when we already have landscaping in place? At the very least the MIS/DEIS should commit to making landscaping a priority. In addition, the MIS/DEIS does not address the long term impacts to our environment which may result from the removal of so many urban trees. Our air quality, climate and aesthetics will all be negatively impacted by removing so many trees throughout downtown. We need specifics NOW as to how many trees are truly in jeopardy. The vague statements in this study are not enough

Primary Corridor Transportation Project  
October 26, 2000  
Page 2

assurance that the lives of so many of our majestic trees will be saved.

The information provided in Figures 5.7-1A and 5.7-1B is in many ways incorrect. The predominant street trees on Dillingham Blvd. are the very large, very old Kamanii trees, not monkeypods (although some monkeypods are located there). Due to their age and size they will not relocate successfully, and therefore, everything possible must be done to preserve these trees in place. Trimming these trees to keep them healthy is important, but to severely trim them will damage their structures and ultimately be their demise. These kamanii trees are important because there are so few mature kamanii left on Oahu's streets. In addition, the second figure indicates that there are no trees on University Avenue. Actually a few years ago, the City planted a large number of shower trees both in the median strip and as street trees, obviously, these too will be affected by the project and have been overlooked.

I spent the afternoon at the Waikiki Improvement Association Annual Membership Luncheon. A recurring theme of theirs has to do with making their streets greener and more pedestrian friendly. We wonder how this can be achieved with the need keep Kukuio Avenue as wide as possible for the BRT. Already visitors complain that Kukuio is ugly, uninviting and unsafe. We were hoping to have more landscaping and greenery placed there, not less. This plan seems to contradict everything I heard today about making Waikiki more desirable.

Other concerns we have include adequate landscaping at transit centers (locations to be determined), landscape mitigation for parking facilities, impacts to environmentally sensitive areas, and other consequences to our urban forest which is, after all, an integral part of our infrastructure.

The Outdoor Circle has spent 88-years fighting to maintain the beauty of our island. We sincerely hope you will take our objections seriously and specifically address the issues we have stated in this testimony. Until then, we cannot support this proposal.

Thank you for the opportunity to speak tonight.

Mary Steiner  
Executive Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
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JEREMY HARRIS  
MAYOR

Ms. Mary Steiner  
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November 13, 2002

CHEYL D. SOON  
DIRECTOR  
GEORGE "KEOKI" UYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

Ms. Mary Steiner, Executive Director  
Na Leo Poha  
The Public Policy Affiliate of the Outdoor Circle  
1314 South King Street, Suite 306  
Honolulu, Hawaii 96814

Dear Ms. Steiner:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the October 5, 2000 Special Transportation Committee Meeting, your oral testimony during the October 26, 2000 Special Transportation Committee Meeting, and your October 26, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. There is one thing that I am sure of and that is that I've done the math for Keolu Boulevard and when you take out the two lanes to be able to put your BRT down the middle you end up with 10-foot travel lanes. And we are extremely concerned about the fate of the street trees on either side and down the middle of the road for that reason. It's not addressed that I can find right now and I want to have absolute assurances from the City as we go that those street trees are going to be protected.

Response: The discussion on tree impacts in the FEIS provides details on the individual tree impacts expected from the project action. Where possible, project designs have tried to avoid trees. However, some trees will have to be replanted or removed to allow for the necessary road widening. In particular, about eleven Monkeypod trees along Keolu Boulevard will be replanted farther from the curb. Trees to be moved will be pruned before replanting, but their canopy is expected to grow back within one year, with full recovery in three to five year's time.

2. As many of you know, The Outdoor Circle is responsible for protecting many of the trees in urban Honolulu, either planting them and then saving them from destruction as well. We are extremely concerned at the lack of priority that's being given our urban landscape in the MIS/DEIS.

Response: A detailed tree survey was conducted in May 2001 by a certified arborist to document existing trees where streets may need to be widened, and to assess the level of impact from such widening. Design drawings have been prepared in close coordination with the arborist to avoid adverse impacts to trees as much as possible.

3. It doesn't seem to address, in addition, the long-term impacts to our environment which may result from the removal of so many of our urban trees. The MIS/DEIS says very clearly that the trees, for example, on Keolu Boulevard and Dillingham Boulevard will either be removed, relocated or severely trimmed back. And I add the word severely in there.

Response: Recent project planning has involved careful review of trees along the In-Town BRT alignment that may be adversely affected. Where possible, project designs have tried to avoid trees. However, in some areas, including but not limited to portions of Dillingham Boulevard, Keolu Boulevard, University Avenue, Saratoga Road, and Kalia Road in Waikiki, some trees will have to be replanted or removed to allow for necessary road widening. Trees that will be moved back from the existing curb will be pruned for replanting. Canopies of monkeypods and most other trees are expected to grow back within one year, with full recovery in three to five years. Kamani trees will take longest to grow back, about four to eight years for full canopy recovery. In the event that some larger trees cannot be successfully moved back, they will be replaced with smaller trees of the same species. All tree trimming will be coordinated with the City and County's Department of Parks and Recreation, Division of Urban Forestry.

4. In addition, the information on figures 5.7-1A and 5.7-1B are incorrect. The trees on Dillingham Boulevard, although there are some monkeypod trees, the majority of those trees are very large, very old, very stately Kamani trees. And they really should not be put in harm's way. And from the looks of where the plan will go, those are the trees at risk.

Response: Figures 5.7-1A and B have been revised in the Final EIS. Both monkeypods and Kamani trees on Dillingham Boulevard will be affected by street widening. Some smaller trees such as Tabebuia, Fiddlewoods, palms, Coral trees, Plumera, Vertical Wilkii, Autograph tree, and Ovarif Kou will also be affected. Substantial effort has been taken to keep the impacts to a minimum. For example, lane widths have been reduced to avoid further widening and bus turnouts placed between the Kamani trees instead of street widening to the Koko Head side of Alakawa Street. Where widening is required, these same trees will be relocated farther back from the street rather than being removed, wherever possible. For every Kamani tree removed from the mauka side of Dillingham Boulevard, two 10 to 12-inch Kamani trees will be planted on the mauka side to fill existing gaps. Also, of the six Kamani trees on the mauka side of Dillingham Boulevard Koko Head of Alakawa Street, three trees are proposed for replanting in the property at the mauka Koko Head corner of Dillingham Boulevard and Alakawa Street. Other trees that are removed will be replaced at a one for one ratio.

5. The reason why they were probably not recognizable to whomever did the study was because we don't have a lot of Kamani trees anymore left as street trees on Oahu. We really need to begin to think about our street trees as being part of our urban forest in the infrastructure that makes our city livable. We really would like to see much more focus put on the landscape and the priorities for that.

Response: Comment noted. It is a statement of opinion.

6. Concerning mitigation the document continues, "Mitigation would consist of revegetation and landscaping along the alignment where possible (emphasis mine). Although planting plans would not be prepared until later stages of final design, desirable locations for special landscaping treatment include areas where 1) existing landscaping has been lost; 2) substantial opportunities exist for enhancement of existing streetscapes; ...". As the stewards of our street trees, we find this wholly unacceptable. Why would we be looking at "desirable locations for special landscaping treatment" when we already have landscaping in place? At the very least the MIS/DEIS should commit to making landscaping a priority.

Response: The statement about special landscaping treatment expresses DTS' commitment to preserving, maintaining, and enhancing the existing streetscape as part of the PCTP. As clarified in the Final EIS, DTS considers landscaping and mitigating the impacts to street trees to be a priority.

7. *In addition, the MIS/DEIS does not address the long term impacts to our environment which may result from the removal of so many urban trees. Our air quality, climate and aesthetics will all be negatively impacted by removing so many trees throughout downtown. We need specifics NOW as to how many trees are truly in jeopardy. The vague statements in this study are not enough assurance that the lives of so many of our majestic trees will be saved.*

**Response:** The FEIS Section 5.7 has been revised to contain more specific information about tree impacts and mitigation. No secondary or cumulative impacts on air quality or climate are expected from tree removal, especially as trees will be preserved or relocated wherever possible. Visual and aesthetic resources will be adversely affected in the areas of tree removal and replanting for the first few years after construction, as replanted trees grow back their canopies. Trees that are removed will be replaced at a one for one ratio (two for one ratio for Kamani trees on Dillingham Boulevard). Trees that are relocated on-site or off-site will be monitored for a year. If relocated trees do not survive the transplanting process, they will be replaced at a one for one ratio. Because trees will be mitigated by relocation and/or replacement, there will be no net loss of trees resulting from this project. Therefore, there will be no cumulative impact on trees.

8. *The information provided in Figures 5.7-1A and 5.7-1B is in many ways incorrect. The predominant street trees on Dillingham Blvd. are the very large, very old Kamani trees, not monkeypods (although some monkeypods are located there). Due to their age and size they will not relocate successfully, and therefore, everything possible must be done to preserve these trees in place. Trimming these trees to keep them healthy is important, but to severely trim them will damage their structures and ultimately be their demise. These Kamani trees are important because there are so few mature Kamani left on Oahu's streets.*

**Response:** See response to comment #4.

9. *In addition, the second figure indicates that there are no trees on University Avenue. Actually a few years ago, the City planted a large number of shower trees both in the median strip and as street trees, obviously, these too will be affected by the project and have been overlooked.*

**Response:** Figures 5.7-1A and B show the locations of potential tree impacts due to street widening and are not intended to be a complete depiction of trees along the alignment. However, project planning subsequent to the MIS/DEIS has determined that the median trees on University Avenue between Kapiolani Boulevard and Dale Street will also need to be removed to accommodate road widening. These rainbow shower trees will be relocated. Section 5.7 and its corresponding figures have been revised in the Final EIS.

10. *I spent the afternoon at the Waikiki Improvement Association Annual Membership Luncheon. A recurring theme of theirs has to do with making their streets greener and more pedestrian friendly. We wonder how this can be achieved with the need keep Kuhio Avenue as wide as possible for the BRT. Already visitors complain that Kuhio is ugly, uninviting and unsafe. We were hoping to have more landscaping and greenery placed there, not less. This plan seems to contradict everything I heard today about making Waikiki more desirable.*

**Response:** Minimal tree impacts are expected on Kuhio Avenue. Most trees will either not be affected, or will be pruned. It appears that two trees will have to be removed because their canopy extends too far into the proposed BRT lane to allow pruning. All tree relocations and removals will be mitigated. See response to comment #7. Moreover, the proposed In-Town BRT alignment takes into account the Livable Waikiki plans for widening sidewalks along Kuhio Avenue and provides the opportunity for additional landscaping.

11. *Other concerns we have include adequate landscaping at transit centers (locations to be determined), landscape mitigation for parking facilities, impacts to environmentally sensitive areas, and other consequences to our urban forest which is, after all, an integral part of our infrastructure.*

**Response:** DTS agrees that transit centers and parking facilities need to be properly landscaped, and sensitive to the existing neighborhood. There are many creative details, lighting, signage and amenities that can be integrated into these facilities.

12. *The Outdoor Circle has spent 88-years fighting to maintain the beauty of our island. We sincerely hope you will take our objections seriously and specifically address the issues we have stated in this testimony. Until then, we cannot support this proposal.*

**Response:** Comment noted. It is a statement of opinion and the objections referred to have been addressed separately.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director



**THE OUTDOOR CIRCLE**

1314 South King St., Suite 306 • Honolulu, HI 96814  
Phone: 808-593-0300 Fax: 808-593-0325

Established 1912  
A Non-profit Organization

**BRANCHES**

- OAHU
  - Kaunohi
  - Lani-Kaula
  - North Shore
  - Waialeale Kahala

**HAWAII**

- Hilo
- Kaunohi
- Kona
- Waikoloa Village
- Waimea

**KAUAI**

- MAUI
- GARDEN CIRCLE
- Lani-Ki

November 2, 2000

Ms. Cheryl Soon, Director  
Department of Transportation Services  
711 Kapiolani Blvd., Ste. 1200  
Honolulu, HI 96813

RE: Primary Corridor Transportation Project Comments to a Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS)

Dear Ms. Soon:

As you may know, The Outdoor Circle is responsible for planning many of the large, stately trees that beautify urban Honolulu. Throughout its history, the organization has planted thousands of trees, and protected many thousands more, from being butchered or destroyed. We believe that this legacy, Honolulu's urban forest, is worth protecting at all costs.

With that in mind, we have reviewed the above referenced document and have both general and specific comments and questions for your consideration:

In general, we are amazed at the lack of studies which are provided to prove the conclusions reached in the MIS/DEIS. For example, the document states that there are no endangered species in the project area, and this may be true, but no botanical survey was done to substantiate this claim. Also missing are traffic congestion studies to show the impacts on the rest of Oahu's traffic as a result of the proposed BRT.

Conclusions regarding the need for this project as stated in the MIS/DEIS are based on a draft of the Development Plan for the Primary Urban Center (PUC DP). As a draft, it has not been accepted by the community nor by the Council. This begs the question as to why this project is being proposed at this time. It seems premature. We are very concerned by the document's statement that development will be encouraged near the transit centers. This type of growth is not development, this is urban sprawl. Again, unless and until the PUC DP is accepted, and we know where development should be directed, it is premature to propose this project.

We feel strongly that this plan should not be approved until more information is

MIS/DEIS Primary Corridor Transportation Project  
November 2, 2000  
Page 2

provided about the transit centers and their locations. We believe there is insufficient information on which to base a decision on the project.

How does this plan, the draft PUC DP and the Integrated Resource Plan for Water tie into each other? Appropriate community planning dictates that these three plans should be reviewed as one to create the least confusion and damage to our communities. Please provide details on this process.

Please provide us with drawings showing the overall width of Kapi'olani Boulevard. Explain how the median strip trees and the sidewalk trees can remain when two lanes of that road will be dedicated to the In-Town BRT. We fear that many, large stately trees will be destroyed.

Additionally, we question how Ward Avenue (now five lanes, four plus one for turning) can be expanded without using the land currently belonging to Thomas Square. Please provide dimensions, travel way widths and drawings showing this. Under no circumstances should Honolulu's oldest urban park be compromised to accommodate transit.

The same question applies to Kuhio Avenue in Waikiki. How will the transit lanes fit and how does this meet the stated goal of both the community and businesses in Waikiki, which call for making Kuhio Avenue greener and more pedestrian friendly?

Specifically:

**Executive Summary:**

Please provide details as to how the design of the transit way and transit stops would be integrated with a tree preservation program. What sort of program are you considering?

What sort of coordination efforts will be made to encourage appropriate transit oriented land use and which groups and agencies will be consulted?

**Chapter 1 Purpose & Need:**

**Sec. 1.0**

The preface contained a statement claiming that people who attended the Trans 2K meetings have a feeling of "ownership" about this transit plan. How many people attended the meetings and what percentage of Oahu's population do they represent? How do you know that those who attended are truly representative of the public? Perhaps those who attended the meetings have a predisposition toward transit. What was done to get opinions from those who did not or could not attend the meetings? Before the State/City undertakes an expenditure of this magnitude, proof must be given that all people, including the traditionally under-served, have been included in the planning for this project.

If the Development Plan for the Primary Urban Center (PUC DP) is still in draft form, how can the City's land use policy, which requires that transportation and land use be planned and developed together, be applied? This MIS/DEIS attempts to justify a transportation plan based on a Development Plan that has not been accepted by neither the community nor Council.

**Chapter 5 Environmental Analysis and Consequences:**

Sec. 5.4.1 Impacts related to visual and aesthetic resources  
We do not feel there is enough information about the substations which are required every 1/2 mile should the Council choose the In-Town BRT as its locally preferred alternative. Our unanswered questions include whether or not land will be condemned to build the substations; will street trees be removed to place the substations on public right-of-way; what will the substations look like, and information on the water table. The community and Council need to know this information before making a decision on which alternative is acceptable. Except stating that the substations will "blend in with the surrounding neighborhoods and placed underground where the water table permits..." the MIS/DEIS provides no information on these structures.

Regarding the discussion on transit centers, the MIS/DEIS says, "Most transit centers are not located in visually sensitive areas." That sentence implies that the City already knows where the transit centers will be located. Please share this information with the public so that we may comment on the entire project.

The document states that the In-Town BRT would require street widening and/or tree trimming at points along the alignment. Further, it says that any visual impacts on landscaping would be mitigated by providing new street trees or appropriate tree trimming. Please explain what the following statement means: "widening in some areas would not have much impact, because widening is expected to be visually compatible with surrounding land uses."

**Section 5.7 Ecosystems**

The MIS/DEIS states clearly that, "Some trees and shrubs would be removed or trimmed to allow the transit stops to be built or the roadway to be widened for the BRT Alternative." Concerning mitigation the document continues, "Mitigation would consist of revegetation and landscaping along the alignment where possible (emphasis mine). Although planting plans would not be prepared until later stages of final design, desirable locations for special landscaping treatment include areas where (1) existing landscaping has been lost; (2) substantial opportunities exist for enhancement of existing streetscapes; ...". We find this wholly unacceptable. Why would we be looking at "desirable locations for special landscaping treatment" when we already have landscaping in place? At the very least the MIS/DEIS should commit to making landscaping a priority. In addition, the MIS/DEIS does not appear to address the long term impacts to our environment which may result from the removal of so many urban trees. Our air quality, air temperatures, climate, and aesthetics will all be negatively impacted by removing so many trees

throughout downtown. Please provide specifics as to the impacts of trimming, relocating and/or removing a large number of street trees.

The information provided in Figures 5.7-1A and 5.7-1B contains many errors. The predominant street trees on Dillingham Blvd. are the very large, very old Kamañi trees, not monkeypods (although some monkeypods are located there). Due to their age and size they will not relocate successfully, and therefore, everything possible must be done to preserve these trees in place. Trimming these trees to keep them healthy is important, but to severely trim them will damage their structures and ultimately be their demise. These kamañi trees are important because there are so few mature kamañis left on Oahu's streets. In the same figures, no trees are shown on University Avenue. In fact, a large number of shower trees both in the median strip and as street trees exist and will obviously be affected by the project. Please correct your figures.

**Sec. 5.12.11 Aesthetic and Visual:**

Language here indicates a commitment to "orderly and clean work sites." However, no commitment is given to protecting the existing trees during construction. Common arboricultural practice calls for tree protection zones to be established around the trees. Such zones protect the trees' bases and canopies from heavy equipment and soil compaction. On average, we recommend 20-foot protection zones around each tree. Trees also must be watered to reduce the negative impacts of construction. Please provide a statement that every measure possible will be taken during construction to protect our street trees and confirm that construction equipment will not be allowed to be parked under trees at any time.

Thank you for the opportunity to comment. We are available to answer any questions you may have and look forward to hearing your response.

Sincerely,

  
Mary Steiner  
CEO

cc: Governor Benjamin J. Cayetano  
Ms. Donna Turchie, Federal Transit Administration  
Councilmember Duke Baldwin  
Mr. Robert Bramen, Parsons Brinckerhoff Quade and Douglas



**THE OUTDOOR CIRCLE**

1314 South King St., Suite 306 • Honolulu, HI 96814  
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May 6, 2002

Established 1912  
A Non-profit Organization

- BRANCHES**
- O'AHU
    - Kaunakakai
    - Lani-Kula
    - North Shore
    - Waialeale
    - Kaunaloa
  - HAWAII
    - Hilo
    - Ka'u
    - Kona
    - Waikoloa Village
    - Waimea
  - KAUAI
  - MAUI
  - GARDEN CIRCLE
    - Lani-Kula

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> floor  
Honolulu, HI 96813

RE: Primary Corridor Transportation Project  
Supplemental Draft Environmental Impact Statement (SDEIS)  
Island of Oahu, District of Honolulu

Dear Ms. Soon:

In addition to our remarks submitted to you dated November 2, 2000 on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS), we offer the following comments on the above referenced Primary Urban Corridor SDEIS. We look forward to receiving your responses to both.

Executive Summary:

Please provide more information about the 13 traction power supply stations (TPSS) which would be required should the embedded plate technology be used. Although the document claims that the TPSS would be concealed within existing parking garages, buildings and transit centers, it indicates that others would be visible. Please provide details as to the size, exact locations, and from where the TPSS would draw its power. Please indicate if these stations will be placed on the public right-of-ways. Has the cost of the land (and rent) to place the TPSS been included in the cost estimates for the project? The SDEIS provides too little information to reach an informed decision as to the environmental and visual aesthetic impact of these stations.

It would be helpful to include a table which identifies the revisions this document contains as opposed to what was contained in the original DEIS.

S.2.2 Evolution of the Alternatives Since the MIS/DEIS:

This section contains a discussion on the community working groups conducted after the Locally Preferred Alternative (LPA) was selected. We note that the working groups were for a small group of invited guests only. It is possible that others might have wanted to participate but could not since they were not invited. Another problem with the working groups was that by holding meetings during the day, only people who could leave their jobs were able to attend. In addition, as of the publication of this document, the Waikiki Working Group has not

Ms. Cheryl D. Soon  
May 6, 2002  
Page 2 of 5

MAY 8 2002

completed their meetings (although it is stated otherwise in the document). Please include their findings in the Final Environmental Impact Statement (FEIS) or indicate that another supplemental document will be distributed when their work is concluded.

Also, the memos from all of the working groups should be included as an addendum to the FEIS and not just referred to in the document.

S.2.3 Capitol Costs:

Do the capitol costs include the cost of purchasing the land to relocate the trees on Dillingham, Hotel, Kapiolani, Kuhio, etc? If not, then please update the capitol costs to include the cost of purchasing/condemning the land and show what the true total cost of the project will be.

S.4 Economic Impacts:

Economic impacts during construction can be computed in ways other than the number of jobs gained. What is lacking in this section is an analysis of the economic impacts (in terms of lost business) to the businesses along the route during construction.

The document asserts that there will be, "up to 47 partial business displacements." Please define partial displacement.

S.3.2 Environmental Impacts:

The Visual and Aesthetic Resources section claims, "Project elements such as transit centers, transit stops, and noise barriers provide urban design opportunities to improve existing streetscapes with cohesively designed architectural elements, landscaping, street furniture, street trees and lighting" (emphasis added). From our experience, noise barriers are always ugly. Please provide examples of where noise barriers have successfully provided urban design opportunities to existing streetscapes or revise your assertion.

The energy consumption by the Refined BRT Alternative is not listed. The paragraph is written in a misleading way and seems to indicate that Refined BRT Alternative would consume hardly any fuel at all. Additionally, please include more information as to from where the energy consumed by this project will come.

Six 20-foot high noise barriers will be needed to reduce noise levels for approximately 150 homes. How will these be designed in order not to look like another Kaheki Highway? Windward residents continue to be angry over the looks of that State highway.

Although we are delighted the SDEIS covers the issue of tree impacts, we are greatly concerned by the disparity in what was written in the MIS/DEIS. In fact, more than 10% of all street trees along the route are impacted by this proposal. We continue to find this unacceptable. Although the City "hopes" to condemn/purchase additional land on which to plant, they do not own the land as of yet and there are no guarantees that they will proceed with plans to do so. The loss of this many mature trees would have significant long term impacts on our urban environment. This is not addressed in the MIS/DEIS nor in the SDEIS either. Our air quality, temperatures, climate and aesthetics will all be negatively impacted by removing so many trees throughout downtown.

Ms. Cheryl D. Soon  
May 6, 2002  
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In addition, we continue to question whether it is the call of a certified arborist to decide what trees should be classified as "notable." An arborist is trained to make decisions regarding a tree's health but not about the significance of a tree in the urban environment.

S.3.3 Mitigation Commitments:

As of the writing of this SDEIS it is impossible to commit to the numbers of trees, notable or otherwise, that would be relocated. The City does not own the property to move the trees onto and there is no commitment in the document to purchase it.

The Outdoor Circle absolutely disagrees with relocating the trees on Kapiolani Blvd. The monkeypod trees on Kapiolani were planted between 1928 and 1935. These mature trees with branches overhanging the Boulevard make for a very special and unique streetscape. Even if the City could purchase the land to relocate the monkeypods further off the road, Kapiolani Blvd. would lose the special character that makes Kapiolani Blvd. a joy to drive.

Also missing from the discussion on street trees is where we agreed to allow the removal of a tree, we agreed *only* if two trees were planted in its place. This is especially important on Dillingham Blvd. where the trees are large and mature. They can never be replaced by trees of comparable size and stature. Therefore, two trees should be planted for every one that is removed and this should be so stated in the FEIS.

The SDEIS does not give enough information on the protection of the trees during construction. The Outdoor Circle would like to be a party to the development of the construction specifications calling for the protection/relocation of the trees.

The Outdoor Circle would also like to be a consulted party in further discussions on the development of architectural approaches and details.

S.7 Required Permits and Approvals:

Please provide us with more information on what is a Street Tree Review permit.

Table 1.3.1 Local and State Transportation Goals and Objectives From Adopted Plans:

This table shows the Primary Urban Center Development Plan as a public review draft dated June, 1999. This draft document should not be included in a list of adopted plans. It is highly controversial and has not been endorsed by either the community or Council. We believe all references to the Draft PUC DP should be removed. Our comments of 11/2/2000 were the same.

Section 3.4 Visual and Aesthetic Conditions:

We disagree that the only affected environment changes from the MIS/DEIS are those that result in the Revised BRT alignment. To our knowledge, no studies were conducted which take into account the removal/relocation of more than 10% of our urban trees. This should be done for the FEIS.

Section 3.4.3 Other Special View Opportunities:

The "non-designated district" special view opportunity should include the green canopy cover on Kapiolani Blvd. Please make that change or indicate why you disagree.

Ms. Cheryl D. Soon  
May 6, 2002  
Page 4 of 5

Section 3.7.2 Freshwater Fish and Terrestrial Wildlife:

When relocating trees within the project area, please identify in the FEIS what measures will be taken to protect the white tern. Although they are primarily sited outside of the project area, they have been seen in the street trees, particularly in Waikiki and Ala Moana Blvd.

Section 4.5 Bicycling Impacts:

It is insufficient to claim, "A separate bike lane would be provided, or an alternative route would be identified, where the BRT alignment would interfere with the present pattern of bicycle travel." Before implementing such an enormous plan as this, more studies of bike routes should be done and the cumulative impacts on traffic, secondary roads and the bikers themselves included in the FEIS. The comment, in the SDEIS, "In most cases, these measures would improve bicycle transportation over existing conditions" may or may not be true.

Section 4.6 Pedestrian Impacts:

The impacts of widening of sidewalks on Kūhio Avenue in Waikiki did not take into account the impacts on street trees. Please identify what those impacts might be.

In addition, if the City does not own the property to widen the sidewalks on Dillingham Blvd., how can positive pedestrian impacts be cited in the SDEIS?

Section 5.4.1 Visual and Aesthetic Impacts:

This section does not mention the impacts resulting from the removal of so many street trees, particularly in the highly sensitive Kapiolani Blvd. district. Please add this into your analysis.

Section 5.7.3 Tree Impacts and Mitigation:

Once again, we are curious as to why the project's certified arborist is the person who decides whether a tree is "notable" given your definition. When collecting information on a culturally significant property you would go to the many stakeholders involved. The same should be done in the case of "notable" trees. Although The Outdoor Circle and the City's Division of Urban Forestry were both consulted in this process there are many groups and individuals that were left out. As with cultural practices, many more groups and individuals should be included in the consultation process.

For the most part we applaud your tree mitigation plans. However, there are still some important items missing from your statements. We disagree with relocating trees on public property to private property. These trees are public trees and should always remain in the public domain. Additionally, although we read of the commitment by the project to identify suitable sites for relocating individual trees, we continue to have concern about the trees' long term survivability. Many of our parks and most of our school campuses do not have the proper irrigation or technology to maintain trees. We believe that the FEIS should commit to a one-for-one tree replacement along the Refined BRT Alternative route except on Dillingham Blvd. where we believe two trees should be replaced for every one that is removed.

We do not believe any trees, whatsoever, should be removed from Kapiolani Blvd. for reasons already stated above.

Ms. Cheryl D. Soon  
May 6, 2002  
Page 5 of 5

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE YEOGIMATAWOTO  
DEPUTY DIRECTOR

TPD11/00-05354R  
TPD05/02-01855R

November 13, 2002

Ms. Mary Steiner, CEO  
The Outdoor Circle  
1314 South King Street, Suite 306  
Honolulu, Hawaii 96814

Dear Ms. Steiner:

Subject: Primary Corridor Transportation Project

This is in response to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your November 2, 2000 letter regarding the MIS/DEIS. Part B responds to your May 6, 2002 letter regarding the SDEIS.

Part A - MIS/DEIS Comments

1. In general, we are amazed at the lack of studies which are provided to prove the conclusions reached in the MIS/DEIS. For example, the document states that there are no endangered species in the project area, and this may be true, but no botanical survey was done to substantiate this claim.

Response: Studies were conducted on resources that were identified as potentially being affected. In addition to those reports specifically cited in the bibliography, numerous unnamed studies contributed to preparation of the MIS/DEIS and FEIS such as noise, air quality, displacements, land use, and historic buildings. Regarding the specific comment about the lack of a botanical survey, it was deemed highly unlikely for an endangered plant to be found in the project area, because the BRT would travel on existing roadways or otherwise disturbed areas; thus, no separate study was conducted.

2. Also missing are traffic congestion studies to show the impacts on the rest of Oahu's traffic as a result of the proposed BRT.

Response: Chapter 4 of the FEIS describes the traffic impacts of the project.

3. Conclusions regarding the need for this project as stated in the MIS/DEIS are based on a draft of the Development Plan for the Primary Urban Center (PUC DP). As a draft, it has not been accepted by the community nor by the Council. This begs the question as to why this project is being proposed at this time. It seems premature. We are very concerned by the document's statement that development will be encouraged near the transit centers. This type of growth is not development, this is urban sprawl. Again, unless and until the PUC DP is accepted, and we know where development should be directed, it is premature to propose this project.

Section 5.11 Parklands and Section 4(F) Evaluation:  
It is unclear when reading the SDEIS how close the project will come to Kapiolani Park and if transit stops are being planned for the zoo. Please clarify this in the final report.

Section 5.12 Impacts of Construction Activities:  
This section omits the impacts of construction on our street trees. Please include a discussion on this as well as how the trees will be protected from heavy machinery during construction.

Section 5.13.1 Cumulative Impacts:  
Our comment here is the same as previously stated. This section does not give any information on the cumulative impacts which will result by losing 10% of our street trees to this project. Please include a comprehensive report in the final document.

Thank you for the opportunity to comment. We sincerely hope that before a Final Environmental Impact Statement is released that these items will be fully investigated. In addition, we look forward to receiving a response to our earlier letters.

Sincerely,

Mary Steiner  
CEO

cc: Council Member Duke Bainum  
Ms. Genevieve Salmonson, Director, OEQC  
Ms. Donna Turchite, Federal Transit Administration  
Mr. Robert Bramen, Parsons Brinckerhoff Quade and Douglas





**Response:** There is no indication of when the updated Primary Urban Center Development Plan (PUC DP) will be adopted by the City Council. The environmental review process of the Primary Corridor Transportation Project (PCTP) cannot be delayed pending this outcome. The In-Town BRT has been designed to support current land uses and future land use patterns, particularly in vacant and underutilized parcels in Kakaako, Iwalei, and near Ala Moana Center and the Convention Center. These are the locations where development is likely to occur with or without the PCTP. Because of this, the Refined LPA has been evaluated in the FEIS as being consistent with the Public Review Draft of the PUC DP (May 2002), as well as the current PUC DP adopted in 1990.

4. **We feel strongly that this plan should not be approved until more information is provided about the transit centers and their locations. We believe there is insufficient information on which to base a decision on the project.**

**Response:** The transit centers and park-and-rides identified in the FEIS as an independent project, or where the transit center will not be built for 12 years or more, will undergo their own environmental review process to address their related impacts and mitigation measures. At that time, details about each individual transit center's specific location, physical characteristics and operations will be documented.

5. **How does this plan, the draft PUC DP and the Integrated Resource Plan for Water tie into each other? Appropriate community planning dictates that these three plans should be reviewed as one to create the least confusion and damage to our communities. Please provide details on this process.**

**Response:** The draft PUC DP and the IRP for Water are consistent City and County plans. The PCTP is consistent with the draft PUC DP and also with the IRP for Water.

6. **Please provide us with drawings showing the overall width of Kapiolani Boulevard. Explain how the median strip trees and the sidewalk trees can remain when two lanes of that road will be dedicated to the In-Town BRT. We fear that many, large street trees will be destroyed.**

**Response:** Where possible, the project has been redesigned to avoid trees. For example, widening is no longer planned for both sides of Kapiolani Boulevard, but will be restricted to only one side of the street. Some BRT stops and pullouts were relocated and carefully placed between existing trees as much as possible to reduce the need to transplant trees. BRT operations were also altered in order to help reduce tree impacts. In order to limit the amount of street widening, exclusive BRT lanes were eliminated in some areas, and were replaced with mixed-use lanes. Despite extensive efforts, some trees will still be affected. On Kapiolani Boulevard eleven monkeypod trees will be relocated on-site, meaning they will be picked up and replanted farther from the curb. None of the median trees on Kapiolani Boulevard between McCully Street and University Avenue will be affected by widening.

7. **Additionally, we question how Ward Avenue (now five lanes, four plus one for turning) can be expanded without using the land currently belonging to Thomas Square. Please provide dimensions, travel way widths and drawings showing this. Under no circumstances should Honolulu's oldest urban park be compromised to accommodate transit.**

**Response:** As a mitigation measure, Pensacola Street will now be used instead of Ward Avenue. Right-of-way from Thomas Square will not be needed for the transit stop at this location.

8. **The same question applies to Kūhlo Avenue in Waikiki. How will the transit lanes fit and how does this meet the stated goal of both the community and businesses in Waikiki, which call for making Kūhlo Avenue greener and more pedestrian friendly?**

**Response:** The BRT will run at curbside along Kūhlo Avenue and share the lane with local buses, private buses, and right-turning vehicles. There will also be a general purpose traffic lane in each direction plus left-turn lanes. This revised cross-section will permit the sidewalks to be widened and landscaping to be added.

9. **Please provide details as to how the design of the transit way and transit stops would be integrated with a tree preservation program. What sort of program are you considering?**

**Response:** A tree preservation program is being developed in conjunction with a certified arborist to mitigate unavoidable impacts. On-site relocation is the preferred mitigation option wherever possible, especially for notable trees. Those trees to be relocated on-site will be kept on the same street, but moved back further from the curb to accommodate road widening. On-site relocation may require some pruning to prepare the tree for transplanting, but the canopy of even mature trees can be kept largely intact. Root balls of appropriate sizes will be contained to move each tree. In the case of on-site relocation, land acquisition by the City and County may be necessary. The tree preservation program will also address methods to minimize tree trimming impacts. A certified arborist would determine the appropriate amount of trimming with the least impact on each tree. The plan will also serve as a tree protection plan to be used during construction. Community input will also be a component in identifying key components of a tree protection plan. Sections 5.7 and 5.12 of the Final EIS provide more details on the tree protection plan. See also response to comment #6.

10. **What sort of coordination efforts will be made to encourage appropriate transit-oriented land use and which groups and agencies will be consulted?**

**Response:** If the current draft of the Primary Urban Center Development Plan were adopted by the City Council in basically its current form, the implementation tools proposed in the plan would be used to encourage transit-oriented development.

11. **The preface contained a statement claiming that people who attended the Trans 2K meetings have a feeling of "ownership" about this transit plan. How many people attended the meetings and what percentage of Oahu's population do they represent? How do you know that those who attended are truly representative of the public? Perhaps those who attended the meetings have a predisposition toward transit. What was done to get opinions from those who did not or could not attend the meetings? Before the State/City undertakes an expenditure of this magnitude, proof must be given that all people, including the traditionally under-served, have been included in the planning for this project.**

**Response:** According to records listed in Appendix A of the FEIS, total attendance at four rounds of meetings during Oahu Trans 2K was over 1,250. The meetings were well advertised, highly participatory, and structured to facilitate public input into the transportation planning process. The meetings were conducted throughout a large cross-section of Oahu (including: Central Honolulu, Pearl City, Aiea, East Honolulu, Kapahulu, Kaimuki, Waiālae, Kāhala, Kāhala, Kāhala, Kapolei, Ewa Beach, Waipahu, Koolau Loa, Windward Oahu, North Shore, Milliani, Waiālae, Waikiki, Ala Haina, Hawaii Kai, Māhiki, McCully-Moiliili, Manoa, Waipahu, Waimanalo, Kaneohe, Kāhala, Kāhala, Palama, Sali Lake, Moanalua, Ala Moana, Kakaako, Chinatown, Downtown Honolulu, Diamond Head, Nuuanu, Alewa and Kailua). For those that could not attend meetings,

communication was maintained through a project mailing list of over 9,000 records, input received through the project website ([www.ohiutrans2k.com](http://www.ohiutrans2k.com)), calls to the project hotline and tear-cards from public meetings/workshops. In addition there has been widespread coverage of the PCTP by the print and broadcast media.

According to the 1999 State of Hawaii Data Book, the population of Oahu for 1999 was 913,222. These numbers are men, women, children and military personnel living on Oahu during that time. The figure, 1,250, is just more than one-tenth of 1% of the population. The attendees included government officials/staff, neighborhood board members, business people, private transit carriers, community members and others, who didn't necessarily have a predisposition to transit] were interested in contributing to the planning process for future transportation alternatives. Based on this input and the input from proponents and opponents of the various alternatives at public hearings the City Council selected the BRT Alternative as the locally preferred alternative in November 2000.

12. *If the Development Plan for the Primary Urban Center (PUC DP) is still in draft form, how can the City's land use policy, which requires that transportation and land use be planned and developed together, be applied? This MIS/DEIS attempts to justify a transportation plan based on a Development Plan that has not been accepted by neither the community nor Council.*

**Response:** See response to comment #3.

13. *We do not feel there is enough information about the substations which are required every 1/2 mile should the Council choose the In-Town BRT as its locally preferred alternative.*

**Response:** The FEIS discloses the general locations proposed, physical characteristics and related impacts of the traction power substations should all-electric vehicle technology be used for the In-Town BRT System. Since installation of the TPSS would not start until 2010 and would not be completed until 2017, it is likely that some sites currently being considered will not be available then and alternative sites will be located. At that time more detailed, site specific environmental analyses will be performed.

14. *Our unanswered questions include whether or not land will be condemned to build the substations; will street trees be removed to place the substations on public right-of-way; what will the substations look like, and information on the water table. The community and Council need to know this information before making a decision on which alternative is acceptable.*

**Response:** See response to comment #13.

15. *Except stating that the substations will "blend in with the surrounding neighborhoods and placed underground where the water table permits..." the MIS/DEIS provides no information on these structures.*

**Response:** See response to comment #13.

16. *Regarding the discussion on transit centers, the MIS/DEIS says, "Most transit centers are not located in visually sensitive areas." That sentence implies that the City already knows where the transit centers will be located. Please share this information with the public so that we may comment on the entire project.*

**Response:** See response to comment #4.

17. *The document states that the In-Town BRT would require street widening and/or tree trimming at points along the alignment. Further, it says that any visual impacts on landscaping would be mitigated by providing new street trees or appropriate tree trimming. Please explain what the following statement means: "widening in some areas would not have much impact, because widening is expected to be visually compatible with surrounding land uses."*

**Response:** The question is about the following statement in the Visual Impacts discussion of the MIS/DEIS (p. 5-40): "The In-Town BRT transitway would require street widening and/or tree trimming at points along the alignment. Any visual impacts on landscaping would be mitigated through provision of new street plantings or appropriate tree trimming to accommodate the BRT vehicles. Other roadway widening in some areas would not have much impact, because widening is expected to be visually compatible with surrounding land uses." This last part of the comment simply refers to those visual impacts that would not require mitigation. The language has been clarified in the FEIS.

18. *The MIS/DEIS states clearly that, "Some trees and shrubs would be removed or trimmed to allow the transit stops to be built or the roadway to be widened for the BRT Alternative." Concerning mitigation the document continues, "Mitigation would consist of revegetation and landscaping along the alignment where possible (emphasis mine). Although planting plans would not be prepared until later stages of final design, desirable locations for special landscaping treatment include areas where (1) existing landscaping has been lost; (2) substantial opportunities exist for enhancement of existing landscapes; ..." We find this wholly unacceptable. Why would we be looking at "desirable locations for special landscaping treatment" when we already have landscaping in place? At the very least the MIS/DEIS should commit to making landscaping a priority.*

**Response:** The statement about special landscaping treatments expresses DTS' commitment to preserving, maintaining, and enhancing the existing streetscapes as part of the PCTP. As clarified in the Final EIS, DTS considers landscaping and mitigating the impacts to street trees to be a priority.

19. *In addition, the MIS/DEIS does not appear to address the long-term impacts to our environment which may result from the removal of so many urban trees. Our air quality, air temperatures, climate, and aesthetics will all be negatively impacted by removing so many trees throughout downtown. Please provide specifics as to the impacts of trimming, relocating and/or removing a large number of street trees.*

**Response:** The FEIS Section 5.7 has been revised to contain more specific information about tree impacts and mitigation. No secondary or cumulative impacts on air quality or climate are expected from tree removal, especially as trees would be preserved or relocated wherever possible. Visual and aesthetic resources will be adversely affected in the areas of tree removal and replanting for the first few years after construction, as replanted trees grow back their canopies. Trees that are removed will be replaced at a one for one ratio (two for one ratio for Kamani trees on Dillingham Boulevard). Trees that are relocated on-site or off-site will be monitored for a year. If relocated trees do not survive the transplanting process, they will be replanted at a one for one ratio. Because trees will be mitigated by relocation and/or replacement, there will be no net loss of trees resulting from this project. Therefore, there will be no cumulative impact on trees.

20. The information provided in Figures 5.7-1A and 5.7-1B contains many errors. The predominant street trees on Dillingham Blvd. are the very large, very old Kamani trees, not monkeypods (although some monkeypods are located there). Due to their age and size they will not relocate successfully, and therefore, everything possible must be done to preserve these trees in place. Trimming these trees to keep them healthy is important, but to severely trim them will damage their structures and ultimately be their demise. These kamani trees are important because there are so few mature kamani left on Oahu's streets.

**Response:** Figures 5.7-1A and B have been revised in the Final EIS. Both monkeypods and Kamani trees on Dillingham will be affected by street widening. Some smaller trees such as Tabejula, Fiddlewoods, palms, Coral trees, Plumeria, Vertical Willow, Autograph tree, and Dwarf Kou will also be affected. Substantial effort has been taken to keep the impacts to a minimum. For example, lane widths have been reduced to avoid further widening and bus turnouts placed between the kamani trees instead of street widening to the Koko Head side of Alakawa Street. Where widening is required, these same trees will be relocated farther back from the street rather than being removed, wherever possible. For every Kamani tree removed from the mauka side of Dillingham Boulevard, two 10 to 12-inch Kamani trees will be planted on the mauka side to fill existing gaps. Also, of the six Kamani trees on the makai side of Dillingham Boulevard Koko Head of Alakawa Street, three trees are proposed for replanting in the property at the makai Koko Head corner of Dillingham Boulevard and Alakawa Street. Other trees that are removed will be replaced at a one for one ratio.

21. In the same figures, no trees are shown on University Avenue. In fact, a large number of shower trees both in the median strip and as street trees exist and will obviously be affected by the project. Please correct your figures.

**Response:** Figures 5.7-1A and B show the locations of potential tree impacts due to street widening and are not intended to be a complete depiction of trees along the alignment. However, project planning subsequent to the MISDEIS has determined that the median trees on University Avenue between Kapohani Boulevard and Dale Street will also need to be removed to accommodate road widening. These rainbow shower trees would be replanted in a different location. Street trees lining University Avenue would not be affected.

22. Language here indicates a commitment to "orderly and clean work sites." However, no commitment is given to protecting the existing trees during construction. Common arboricultural practice calls for tree protection zones to be established around the trees. Such zones protect the trees' bases and canopies from heavy equipment and soil compaction. On average, we recommend 20-foot protection zones around each tree. Trees also must be watered to reduce the negative impacts of construction. Please provide a statement that every measure possible will be taken during construction to protect our street trees and confirm that construction equipment will not be allowed to be parked under trees at any time.

**Response:** Thank you for noting this omission. Every precaution possible will be taken during construction to protect street trees. Construction mitigation measures will include tree protection zones that will be observed except in cases where earthwork at or near the base of a tree is necessary, construction watering of trees, and prohibiting construction vehicles from being parked under trees to avoid soil compaction.

Part B - SDEIS Comments

23. Please provide more information about the 13 traction power supply stations (TPSS) which would be required should the embedded plate technology be used. Although the document claims that the TPSS would be concealed within existing parking garages, buildings and transit centers, it indicates that others would be visible. Please provide details as to the size, exact locations, and from where the TPSS would draw its power.

**Response:** The BRT system will initially use hybrid vehicles. The TPSSs would be enclosed in a 35' by 15' structure. If the TPSS cannot be accommodated in a parking garage, building or transit center it would be designed to blend in with the surrounding area. The TPSS would acquire its power from HECO distribution lines.

24. Please indicate if these stations will be placed on the public right-of-ways.

**Response:** The majority of the In-Town BRT TPSSs will be located on City and State property.

25. Has the cost of the land (and rent) to place the TPSS been included in the cost estimates for the project?

**Response:** Yes, these costs are included in the cost estimates.

26. The SDEIS provides too little information to reach an informed decision as to the environmental and visual aesthetic impact of these stations.

**Response:** The TPSSs would either be incorporated into existing or future structures, or would be placed in areas that are not considered to have aesthetic value, such as parking lots. The FEIS discloses the general locations proposed, physical characteristics and related impacts of the traction power substations should all-electric vehicle technology be used for the In-Town BRT System. Since installation of the TPSS would not start until 2010 and would not be completed until 2017, it is likely that some sites currently being considered will not be available then and alternative sites will be located. At that time more detailed, site specific environmental analyses will be performed.

27. It would be helpful to include a table which identifies the revisions this document contains as opposed to what was contained in the original DEIS.

**Response:** The FEIS indicates changes by the vertical line in the right-hand margin.

28. S.2.2 Evolution of the Alternatives Since the MISDEIS  
**Response:** This section contains a discussion on the community working groups conducted after the Locality Preferred Alternative (LPA) was selected. We note that the working groups were for a small group of invited guests only. It is possible that others might have wanted to participate but could not since they were not invited. Another problem with the working groups was that by holding meetings during the day, only people who could leave their jobs were able to attend. In addition, as of the publication of this document, the Waitaiti Working Group has not completed their meetings (although it is slated otherwise in the document). Please include their findings in the Final Environmental Impact Statement (FEIS) or indicate that another supplemental document will be distributed when their work is concluded.

**Response:** Part of the working groups' members' responsibilities was to take the information discussed during the working group meetings and disseminate it to their respective organizations, obtain feedback, and bring that feedback to the working group meetings.

The SDEIS Appendix A, Section A.2.1, states that the working groups were formed in 2001 and at the time the SDEIS was published the Walkiki Working Group had had three meetings. FEIS Appendix A reflects the April 6 and 22, 2002 Walkiki Working Group meetings.

29. Also, the memos from all of the working groups should be included as an addendum to the FEIS and not just referred to in the document.

**Response:** The SDEIS and FEIS Appendix A summarize the major community outreach activities associated with the project.

30. Do the capital costs include the cost of purchasing the land to relocate the trees on Dillingham, Hotel, Kapilani, Kuhio, etc? If not, then please update the capital costs to include the cost of purchasing/condemning the land and show what the true total cost of the project will be.

**Response:** The capital costs include the cost of purchasing land to relocate the trees.

31. Economic impacts during construction can be computed in ways other than the number of jobs gained. What is lacking in this section is an analysis of the economic impacts (in terms of lost business) to the businesses along the route during construction.

**Response:** The SDEIS and FEIS disclose that businesses near construction sites would be adversely affected by congestion and reduced access, and therefore, may suffer losses in revenues. The revenue losses suffered by affected businesses would vary substantially depending on many factors, such as the type of business, the characteristics of the clientele, and the effectiveness of public information about the status of construction. As described in the SDEIS and FEIS, the City will implement a maintenance of traffic plan so that access to businesses along the project area will be maintained at all times, but detours may be necessary. In addition, the City will implement a public information program so affected businesses are made aware of the status of construction activities, so they can plan accordingly.

32. The document asserts that there will be, "up to 47 partial business displacements." Please define partial displacement.

**Response:** The FEIS discloses the names of all the businesses, institutions and residences affected by right-of-way requirements. A partial displacement is defined as an impact on the property, but not to the extent where the inhabitant (e.g., business or residence) would have to be relocated. In general, the partial displacements impacts will involve driveway reconstruction, and displacements of parking or landscaping.

33. The Visual and Aesthetic Resources section claims, "Project elements such as transit centers, transit stops, and noise barriers provide urban design opportunities to improve existing streetscapes with cohesively designed architectural elements, landscaping, street furniture, street trees and lighting" (emphasis added). From our experience, noise barriers are always ugly. Please provide examples of where noise barriers have successfully provided urban design opportunities to existing streetscapes or revise your assertion.

**Response:** The citation provided will be revised in the FEIS Executive Summary to eliminate noise barriers.

34. The energy consumption by the Refined BRT Alternative is not listed. The paragraph is written in a misleading way and seems to indicate that Refined BRT Alternative would consume hardly any fuel at all. Additionally, please include more information as to from where the energy consumed by this project will come.

**Response:** The SDEIS and FEIS Section 5.9 present the energy analysis. The energy analysis includes the No-Build, TSM, and Refined LPA Alternatives for direct energy (operational) and indirect energy (construction). The Refined LPA will require more indirect energy, but result in less direct energy by 2025.

35. Six 20-foot high noise barriers will be needed to reduce noise levels for approximately 150 homes. How will these be designed in order not to not look like another Kaihaki Highway? Windowward residents continue to be angry over the looks of that State highway.

**Response:** The noise barrier in Kuniia was dropped as a noise abatement measure of the PCTP because the H-1 express lanes from Manapapa Drive to Kepoia are no longer part of this project. The express lane extension is a SDOT project.

36. Although we are delighted the SDEIS covers the issue of tree impacts, we are greatly concerned by the disparity in what was written in the MIS/DEIS. In fact, more than 70% of all street trees along the route are impacted by this proposal. We continue to find this unacceptable. Although the City "hopes" to condemn/purchase additional land on which to plant, they do not own the land as of yet and there are no guarantees that they will proceed with plans to do so. The loss of this many mature trees would have significant long term impacts on our urban environment. This is not addressed in the MIS/DEIS nor in the SDEIS either. Our air quality, temperatures, climate and aesthetics will all be negatively impacted by removing so many trees throughout downtown.

**Response:** A vast majority of the trees that will be affected by this project will be moved slightly. The remaining ones will be relocated on-site or off-site. Only those trees that were determined by a certified arborist to be in poor or fair shape and/or overmature are recommended for removal and replacement with healthy trees.

37. In addition, we continue to question whether it is the call of a certified arborist to decide what trees should be classified as "notable." An arborist is trained to make decisions regarding a tree's health but not about the significance of a tree in the urban environment.

**Response:** Determinations were based on information received during discussions with The Outdoor Circle and the City's Department of Parks and Recreation.

38. As of this writing of the SDEIS it is impossible to commit to the numbers of trees, notable or otherwise, that would be relocated. The City does not own the property to move the trees onto and there is no commitment in the document to purchase it.

**Response:** DTS will obtain the right-of-way necessary for tree relocations in their desired locations.

Response: We assume you are referring to Table 5.1-2 of the MISDEIS, which was not provided in the SDEIS. We disclosed that the Primary Urban Center Development Plan (PUC DP) update has not been adopted by the City Council. We chose to unofficially discuss project consistency with the Revised Draft PUC DP in the MISDEIS and the SDEIS along with the official discussion of project consistency with the existing PUC DP because we wanted to inform the public how transit-oriented development concepts of the revised draft (i.e. urban villages) would be supported by the BRT alternative.

45. We disagree that the only affected environment changes from the MISDEIS are those that result in the Revised BRT alignment. To our knowledge, no studies were conducted which take into account the removal/relocation of more than 10% of our urban trees. This should be done for the FEIS.

Response: Because the tree impacts will be mitigated by relocation and/or replacement, there will be no net loss of trees. Therefore, there will be no cumulative impact on trees.

46. The "non-designated district" special view opportunity should include the green canopy cover on Kapiolani Blvd. Please make that change or indicate why you disagree.

Response: The visual impacts discussion in Section 3.4 of the Final EIS has been revised to include reference to Kapiolani Boulevard, as requested.

47. When relocating trees within the project area, please identify in the FEIS what measures will be taken to protect the white fern. Although they are primarily sited outside of the project area, they have been seen in the street trees, particularly in Weikiki and Ala Moana Blvd.

Response: Section 5.7 of the SDEIS addressed this issue. DTS has conducted interagency coordination with the State Department of Land and Natural Resources and with the U.S. Fish and Wildlife Service. A survey of the project area will be conducted for white ferns and their nests prior to final design, and sensitive trees and areas will also be monitored immediately prior to and/or during construction activities affecting trees.

48. It is insufficient to claim, "A separate bike lane would be provided, or an alternative route would be identified, where the BRT alignment would interfere with the present pattern of bicycle travel." Before implementing such an enormous plan as this, more studies of bike routes should be done and the cumulative impacts on traffic, secondary roads and the bikers themselves included in the FEIS. The comment, in the SDEIS, "in most cases, these measures would improve bicycle transportation over existing conditions" may or may not be true.

Response: We disclosed in the MISDEIS and SDEIS that many of the streets proposed for use by the In-Town BRT are not currently designated as bikeways, but cyclists still use them. Implementing the In-Town BRT will improve city streets for cyclists. The Hawaii Bicycling League concurs with this. It is not necessary for the project to conduct studies of bicycle usage in Honolulu because of the recently completed Honolulu Bicycle Master Plan (April 1999). The project will implement portions of the master plan as described in Section 4.5.2 of the SDEIS.

39. The Outdoor Circle absolutely disagrees with relocating the trees on Kapiolani Blvd. The monkeypod trees on Kapiolani were planted between 1926 and 1935. These mature trees with branches overhanging the Boulevard make for a very special and unique streetscape. Even if the City could purchase the land to relocate the monkeypods further off the road, Kapiolani Blvd. would lose that special character that makes Kapiolani Blvd. a joy to drive.

Response: Due to engineering constraints, impacts to eleven monkeypod trees will be unavoidable (ten were reported in the SDEIS, but one tree has since been added to the list). Because the trees will be moved as close as possible to their original locations on Kapiolani Boulevard, and will be moved with minimal pruning, no adverse impacts to the special character of Kapiolani Boulevard are expected.

40. Also missing from the discussion on street trees is where we agreed to allow the removal of a tree, we agreed only if two trees were planted in its place. This is especially important on Dillingham Blvd. where the trees are large and mature. They can never be replaced by trees of comparable size and stature. Therefore, two trees should be planted for every one that is removed and this should be so stated in the FEIS.

Response: The FEIS will state that two Kamañi trees will be planted to replace each Kamañi tree that is removed on Dillingham Boulevard.

41. The SDEIS does not give enough information on the protection of the trees during construction. The Outdoor Circle would like to be a party to the development of the construction specifications calling for the protection/relocation of the trees.

Response: Additional information will be provided in the FEIS to specify tree protection plans to be implemented during construction. The Outdoor Circle will be kept informed of construction specifications that will be determined in cooperation with the Department of Parks and Recreation.

42. The Outdoor Circle would also like to be a consulted party in further discussions on the development of architectural approaches and details.

Response: DTS will continue to coordinate with the Outdoor Circle on those matters of interest to your organization.

43. Please provide us with more information on what is a Street Tree Review permit.

Response: A Street Tree Review will be conducted by the Department of Planning and Permitting (DPP) as part of the construction plan review by the City and County. The DPP's Street Tree Review applies only to those trees not located within a Special Design District affected trees inside designated Special Design Districts will be addressed in the Special Design District Permit.

44. Table 1.3.1 Local and State Transportation Goals and Objectives from Adopted Plans. This table shows the Primary Urban Center Development Plan as a public review draft dated June, 1999. This draft document should not be included in a list of adopted plans. It is highly controversial and has not been endorsed by either the community or Council. We believe all references to the Draft PUC DP should be removed. Our comments of 11/2/2000 were the same.

49. The impacts of widening of sidewalks on Kuhio Avenue in Waikiki did not take into account the impacts on street trees. Please identify what those impacts might be.

**Response:** An inventory and analysis of trees on Kuhio Avenue has been conducted, the results of which are included in the FEIS. Several trees will need to be pruned or relocated along Kuhio Avenue, but no tree removals are anticipated.

50. In addition, if the City does not own the property to which the sidewalks on Dillingham Blvd., how can positive pedestrian impacts be cited in the SDEIS?

**Response:** Currently, Dillingham Boulevard has a wide sidewalk corridor (8-12 feet wide) within the existing right-of-way. Much of the existing sidewalks are uneven and cracking due to uplift from the Kama'i trees (from Waikamilo to King Street). In addition, significant portions of Dillingham Boulevard do not have sidewalk curb ramps (from Middle Street to Kalih Street). Existing sidewalks will be upgraded to comply with ADA requirements by providing smooth sidewalks and curb ramps. Sidewalk improvements will also include providing new sidewalks in some locations that currently do not have any. Some land acquisition will be required at the intersections to accommodate the required road widening. However, this is isolated to the total sidewalk corridor length. Therefore, the remaining 84% of sidewalk corridor length will be improved without any land acquisition.

51. Section 5.4.1 Visual and Aesthetic Impacts

This section does not mention the impacts resulting from the removal of so many street trees, particularly in the highly sensitive Kapiolani Blvd. district. Please add this into your analysis.

**Response:** Section 5.4.1 of the FEIS has been revised to address potential visual impacts resulting from tree impacts on Kapiolani Boulevard. Because the tree impacts on Kapiolani Boulevard will be mitigated, as described in Section 5.7, no visual impact is expected.

52. Once again, we are curious as to why the project's certified arborist is the person who decides whether a tree is "notable" given your definition. When collecting information on a culturally significant property you would go to the many stakeholders involved. The same should be done in the case of "notable" trees. Although the Outdoor Circle and the City's Division of Urban Forestry were both consulted in this process there are many groups and individuals that were left out. As with cultural practices, many more groups and individuals should be included in the consultation process.

**Response:** See response to comment #37.

53. For the most part we applaud your tree mitigation plans. However, there are still some important items missing from your statements. We disagree with relocating trees on public property to private property. These trees are public trees and should always remain in the public domain.

**Response:** Trees that must be relocated will be placed as much as possible on public property. However, due to the importance of relocating trees on-site rather than off-site, public property may not always be available in the immediate vicinity, and private property may have to be considered. Such decisions will be made on a case-by-case basis for each tree during the design phase.

54. Additionally, although we read of the commitment by the project to identify suitable sites for relocating individual trees, we continue to have concern about the trees' long term survivability. Many of our parks and most of our school campuses do not have the proper irrigation or technology to maintain trees. We believe that the FEIS should commit to a one-for-one tree replacement along the Reformed BRT Alternative route except on Dillingham Blvd. where we believe two trees should be replaced for every one that is removed.

**Response:** DTS will monitor trees that are relocated (on-site and off-site) for one year to ensure that they are viable. Trees that do not survive the transplanting process will then be replaced one for one. DTS will replace Kama'i trees on Dillingham Boulevard at a two for one ratio.

55. We do not believe any trees, whatsoever, should be removed from Kapiolani Blvd. for reasons already stated above.

**Response:** See response to comment #39.

56. It is unclear when reading the SDEIS how close the project will come to Kapiolani Park and if transit stops are being planned for the zoo. Please clarify this in the final report.

**Response:** The only element of the project near Kapiolani Park is a BRT transit stop within the right-of-way of Kapahulu Avenue, fronting the landscaped area of Honolulu Zoo and adjacent to the pedestrian path. This discussion is provided in the FEIS.

57. Section 5.12 Impacts of Construction Activities

This section omits the impacts of construction on our street trees. Please include a discussion on this as well as how the trees will be protected from heavy machinery during construction.

**Response:** Section 5.12 has been revised to discuss how trees will be protected during construction. A tree preservation plan will be prepared and implemented during the construction phase of the project.

58. Section 5.13.1 Cumulative Impacts

Our comment here is the same as previously stated. This section does not give any information on the cumulative impacts which will result by losing 10% of our street trees to this project. Please include a comprehensive report in the final document.

**Response:** See response to Comment #45.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 627-6876. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

## Testimony in Support of the Proposed BRT System

Hello and thank-you for the opportunity to testify on this important matter. My name is Chris Martelles and I am an executive director of the Pacific Action Alliance (PAA), who I represent here today. We are a student and community group whose goal is to promote positive and sustainable change, with a membership of over a few hundred.

Efficient, timely, and reliable mass transit is a necessity for Hawaii. Limited land masses such as Hawaii will feel the increasing traffic problems long before other larger and spacious states will. Traffic flows are predicted to double in Hawaii in the next 20 years based on current trends. The Bus system that is in place now, although servicing many island residents, is slow, crowded and frequently late. Many cities and states around the world have incorporated a mass transit system into their urban plans, in order to provide an efficient alternative to driving.

Completely dependent on oil, Hawaii must strive to make the leap to a modern, sustainable world. Mass transit will be an integral part of this leap.

BRT will help address these problems because....

- BRT will be faster than ordinary buses, and time is precious to students, young people, and business professionals
- An efficient mass transit system will offer people a viable alternative to driving
- BRT's electric or hybrid vehicles will help keep our air clean, as the natural environment is Hawaii's most precious resource
- There will be a consumer demand for it

I hope that you will vote favorably on the move to join the modern world, and bring Honolulu into the next century. During the next decade, Oahu especially, will see the obvious necessity and demand for an efficient mass transit system. They work very well in other parts of the world. It is time for it to start working well for us.

Thank-you very much for your time.

JEREMY HARRIS  
MAYOR

DEPARTMENT OF TRANSPORTATION SERVICES  
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CHERYL D. SOOH  
DIRECTOR  
GEORGE NICKS • IRIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

Mr. Chris Martelles  
Executive Director  
Pacific Action Alliance

Dear Mr. Martelles:

Subject: Primary Corridor Transportation Project

This is in response to your testimony regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. Efficient, timely, and reliable mass transit is a necessity for Hawaii. Limited land masses such as Hawaii will feel the increasing traffic problems long before other larger and spacious states will. Traffic flows are predicted to double in Hawaii in the next 20 years based on current trends. The bus system that is in place now, although servicing many island residents, is slow, crowded and frequently late. Many cities and states around the world have incorporated a mass transit system into their urban plans, in order to provide an efficient alternative to driving.

Response: Thank you for your comments. The City is always striving to improve the public transit system and the BRT is an additional component in that effort.

2. Completely dependent on oil, Hawaii must strive to make the leap to a modern, sustainable world. Mass transit will be an integral part of this leap.

Response: Comment noted.

3. BRT will address these problems because ...

- BRT will be faster than ordinary buses, and time is precious to students, young people, and business professionals
- An efficient mass transit system will offer people a viable alternative to driving
- BRT's electric or hybrid vehicles will help keep our air clean, as the natural environment is Hawaii's most precious resource
- There will be a consumer demand for it.

Response: We concur with these comments.

Mr. Chris Martelias  
Page 2  
November 13, 2002

4. *I hope that you will vote favorably on the move to join the modern world, and bring Honolulu into the next century. During the next decade, Oahu especially, will see the obvious necessity and demand for an efficient mass transit system. They work very well in other parts of the world. It is time for it to start working well for us.*

**Response:** Thank you for supporting the BRT project.

We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

TESTIMONY OF RICHARD KANE  
OF THE PACIFIC RESOURCE PARTNERSHIP  
SEPTEMBER 25, 2000

My name is Richard Kane. Today I am providing testimony for The Pacific Resource Partnership, the market recovery program of Hawaii's Carpenters Union and its Signatory contractors.

All of us are here today because the City Council will soon be selecting one of three Primary Urban Corridor transportation alternatives.

We support the most ambitious of the three alternatives, the Bus Rapid Transit alternative. We support this alternative because it is the best long-range plan for moving people between the rapidly developing second city of Kapolei and Honolulu's urban core.

No doubt some residents in Kapolei and Waipahu are concerned about the construction of transit centers and park-and-ride facilities in their neighborhoods. In response to such concerns, the PUC major investment study promises that the impact of any additional traffic will be minimized through site selection. The study also assures us that visual conditions will be maintained or improved through "cohesively designed landscaping, street furniture, street trees and lighting."

The Pacific Resource Partnership applauds the results of the involvement of Oahu's stakeholders in the creation of this transportation vision. Their vision is best realized through the Bus Rapid Transit alternative. We urge your support of that alternative.

Thank you for this opportunity to share.

Richard Kane



**The Pacific Resource Partnership**



Pacific Tower - Suite 1501  
1001 Bishop Street  
Honolulu, Hawaii 96813  
Telephone (808) 528-4528 • Fax (808) 528-0421

October 12, 2000

My name is Richard Kane. Today I am providing testimony on behalf of The Pacific Resource Partnership (PRP), the market recovery program of Hawaii's Carpenters Union and its signatory contractors. PRP appreciates this opportunity to comment on the City & County's Draft Environmental Impact Statement (DEIS) of the Primary Corridor Transportation Project. PRP supports the Bus Rapid Transit (BRT) alternative.

Oahu's primary transportation corridor stretches from Kapolei to Waikiki. Most of Oahu's travel occurs within this corridor, where the transportation infrastructure is currently insufficient. Improvements are needed - as soon as possible!

The City and County recently completed an extensive community-based transportation planning effort, Trans 2K. That effort has led to historic, widespread community agreement on fundamental issues.

Within the framework of that agreement, it is further understood that:

- Transit has to be fast. According to the DEIS, the in-town BRT vehicle, operating on an exclusive lane, would take eight minutes to travel from Middle Street to Downtown Honolulu.
- It must attract new riders. According to the DEIS, only the BRT will result in a significant number of new transit trips.
- It should accommodate future transportation needs. According to the DEIS, only the in-town BRT will be capable of handling any increase in transit trips downtown in 2025.
- It needs to be reliable. According to the DEIS, the in-town BRT would operate every two minutes during the peak periods from Middle Street to Downtown, and every four minutes during peak periods on the branch segments.

Attendees at meetings such as these tend to eloquently express their many concerns with the specifics of a transportation initiative. Instead, PRP is here primarily to express its support of the extensive, community-based transportation visioning process undertaken by the City & County of Honolulu. However, it is also important to note that only the BRT alternative provides the vision of a transportation infrastructure that is sufficient to improve Oahu's quality of life. Thanks for the opportunity to share!

Richard C. Kane  
richkane@prp-hawaii.com

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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE 'KEOKI' MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

Mr. Richard Kane  
The Pacific Resource Partnership  
Pacific Tower, Suite 1501  
1001 Bishop Street  
Honolulu, Hawaii 96813

Dear Mr. Kane:

Subject: Primary Corridor Transportation Project

This is in response to your September 25, 2000 letter, October 12, 2000 letter, and your oral testimony at the October 12, 2000 formal Public Hearing regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. We support the most ambitious of the three alternatives, the Bus Rapid Transit Alternative. We support this alternative because it is the best long-range plan for moving people between the rapidly developing second city of Kapolei and Honolulu's urban core.

Response: Comment noted. Your comment is a statement of the preference for an LPA.

2. PRP supports the Bus Rapid Transit (BRT) alternative.

Response: Comment noted. It is a statement of the commenter's preference for an LPA.

3. Within the framework of that agreement, it is further understood that Transit has to be fast. According to the MIS/DEIS, the In-Town BRT vehicle, operating on an exclusive lane, would take eight minutes to travel from Middle Street to Downtown Honolulu. It must attract new riders. According to the DEIS, only the BRT will result in a significant number of new transit trips. It should accommodate future transportation needs. According to the DEIS, only the In-Town BRT will be capable of handling any increase in transit trips downtown in 2025. It needs to be reliable. According to the DEIS, the In-Town BRT would operate every two minutes during the peak periods from Middle Street to Downtown, and every four minutes during peak periods on the branch segments.

Response: Comment noted. The statements are consistent with the MIS/DEIS.

Mr. Richard Kane  
Page 2  
November 13, 2002

4. However, it is also important to note that only the BRT alternative provides the vision of a transportation infrastructure that is sufficient to improve Oahu's quality of life.

Response: Comment noted. The project agrees with this statement.

We appreciate your interest in the project.

Sincerely,

  
CHERYL D. SOON  
Director



**SIERRA CLUB, HAWAII CHAPTER**  
P.O. Box 2577  
Honolulu, HI 96803  
tel: 538.6616  
Director: Jeffrey Mikulina  
mikulina@lava.net  
fax: 537.9019

*Mālama i ka Honua*

20 October 2000

00 OCT 24 P 2:09

Cheryl Soon  
City & County Department of Transportation Services  
777 Kapiolani Boulevard, Suite 1200  
Honolulu, HI 96813

Governor Benjamin Cayetano  
c/o Office of Environmental Quality Control  
235 South Beretania St. Suite 702  
Honolulu, HI 96813

The Sierra Club, Hawaii Chapter, supports the Bus Rapid Transit plan as described in the Major Investment Study/Draft Environmental Impact Statement.

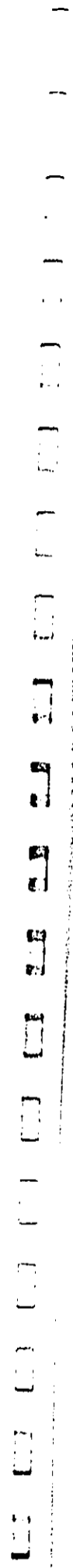
By providing more efficient and speedier transit options, we can help make that shift away from autos. What this plan does in town is gets cars out of the way so that buses can run on time. It does so in a modest, balanced way. If the projections hold, the plan will save nearly 40 thousand barrels of oil per year for the BRT alternative.

Smart transportation plans should do two things: 1) move people from point A to point B in an efficient and cost-effective manner; and 2) help control land-use decisions to foster smart growth. Many residents in Honolulu (estimated at 25%) cannot or do not have access to a car, making expanded public transit even more important.

The Sierra Club, Hawaii Chapter, supports the efforts the City has made in regards to the PUC Transportation plan and would like to see the BRT alternative implemented.

Below are some specific concerns that we would like to see better addressed in the FEIS:

- 5-3 The in-town BRT must utilize electric or fuel cell technology. In order to attract transit riders away from their private automobiles, the transit system must be made attractive. A quiet, zero-emission vehicle would further entice non-transit types to try the new system. A noisy, polluting bus would not. There are other reasons for this as well.
  - Technology: while electric and fuel cell technology is starting to mature, petroleum-based energy is yesterday's technology. Given greenhouse gas reduction protocols, resource depletion and political vigors of oil exporting countries, selecting oil-based technology doesn't make sense.



- Renewable energy: Hawaii is the most oil-dependent state in the nation. Diesel-burning buses won't help Hawaii make the transition to a renewable-based energy system. An electric transit system could be integrated with a renewable-energy powered grid.
- Construction impacts: the system should be built right the first time to avoid costly and annoying construction impacts from installing electric systems later.
- Permanence: by building a more elaborate setup (instead of just another lane), developers are more likely to follow-through with plans on redevelopment of key areas.
- Local pollution: carbon monoxide levels at many key intersections will exceed the state's ambient air quality standards in 2025. A zero emission transit system will help to reduce transportation's contribution to the problem.
- Attractiveness: a zero-emission, quiet, electric propulsion system is much more attractive than a loud, polluting diesel engine. Tourists and residents alike would likely be more attracted to an electric or fuel cell system.

2-24 Why doesn't the in-town transit line—or other components of the BRT—extend to the airport? Will tourists actually have to transfer at Middle Street if they wish to use transit to get to Waikiki?

2-27 Why are both in-town BRT lines so far makai in the Kakaako area? Wouldn't it make more sense to move one of the lines further mauka, especially if it could take advantage of one of the one-way corridors (Beretani or King)?

- Joining the in-town BRT transitway with a bikeway offers the following benefits:
- Predictability of transit vehicles versus private automobiles for biker safety.
  - Minimize bike-car interactions.
  - Minimize transit-car interactions.
  - Healthier for bikers if zero-emission vehicles are used for transit.
- An ideal might be to use Young Street as an in-town BRT and bikeway-only street.

2-31 How realistic and feasible is the STREAM electric technology for the in-town BRT? Or has this just been added as an entitlement that will not appear in the final transit system?

2-47 Aside from transit center parking lots and bike racks offered on buses, how are the TSM and BRT multi-modal? How do they mesh airport and ferry users?

3-9 The Sierra Club is concerned about inducing development on the Ewa plain and central O'ahu—especially with more residential development that lacks the components of a smart growth community. Will this plan induce more residential-only construction in these areas?

3-10 What actions are being taken by the City or State to encourage mixed-use development in the Primary Urban Corridor to reduce separation of living, working, and shopping (or "productive" and "attractive" endpoints) to minimize transportation need? Will green spaces in the Kakaako and Keeaunohi Street area be enhanced or preserved?

3-58 Lead levels should be indicated in units or measuring intervals that are equivalent to the ambient air quality standards.

3-68 The presence of endangered species is mentioned on page 3-68, but no mention of impacts or mitigation appear in Chapter 5.

4-4 Much of the impact analysis is based on numbers generated by traffic modeling. Could these analyses of ridership forecasting (Table 4.1-2) and traffic timing be shown? What assumptions were made? What types of models were used?

4-5 Number of transfers that are needed (nearly 50% of all transit rides) will be a deterrent to use transit. Transfers should be minimized or other incentives need to be put in place. Every incentive possible should be implemented to increase the attractiveness of the using transit. For example, electric tracking indicators at the transit stops could be used to convey the estimated time of arrival of the next appropriate bus. Or bus schedules and updates could be made available for use in Palm Piles via the web, as the Tri-Met does in Portland, Oregon.

Some employers, such as Hawaiian Electric Industries, encourage their employees to use transit through subsidization of bus passes and other incentives. Are any city or state incentives contemplated to ensure that the new transit system will be used to its fullest?

4-13 Even under BRT, bottlenecks will occur along primary transportation lines. Screenline analysis (Table 4.2-3) indicates that all of the alternatives fail to meet the level of service required at the peak hour. Getting cars off the road must be a main objective in the Primary Urban Corridor transportation plan.

4-24 Bike impacts. No bikeways should be taken away with any plan. Honolulu has a long way to go before it can be considered a "bike-friendly" city. Again, joining transitway and bikeway facilities should be considered as an option along many of the routes. Safety concerns are the most often raised issue when it comes to deterrents to biking in town.

5-43 The carbon monoxide microscale analysis indicates that more needs to be done to reduce human exposure to CO at populated intersections. Clearly, use of alternative technology, such as electric or fuel cell propulsion, would reduce the localized emission of CO and other pollutants.

5-56 The in-town BRT has an opportunity to foster a distinct "sense of place" in Honolulu. This could be done by clearly indicating the "hubs" on the transit maps, allowing surfboards on the buses (racks along the sides), and planting native trees and plants along the routes.

5-61 Although we support the BRT alternative, is there anything preventing the bus propulsion improvements (electric or hybrid) for the TSM or no-build alternative? This analysis seems to be absent.

5-61 With regards to the annual oil savings the BRT vs. no-build and TSM, the assumption appears to be that all private autos will use similar fuel and achieve similar gas mileage in 2025 as they do in 2000. Is this true?

5-63 The electricity demand for an all-electric in-town BRT is estimated at 11.3 MW. It is difficult to believe that this can be met with the utility's "reserve" capacity. According to the Hawaii Energy Strategy (DBEDT, 2000), Oahu is planning to install 605 MW of additional generating capacity before 2017, most of it from coal sources. How can the 11.3 MW come from "reserve" capacity?

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GEORGE NEOSI • LUYAJIOTO  
DEPUTY DIRECTOR

JEREMY HARRIS  
MAYOR

Sierra Club, Hawaii Chapter Comments on PUC Transportation Plan EIS/MIS

5-63 Will substations need to be constructed to feed electricity to the in-town BRT? Where will they be located? How will this affect the need for the Kamoko-Pakele 138 kV power line project proposed for Waahila Ridge?

5-76 The Hawaii Department of Transportation Water has a terrible record when it comes to protecting Hawaii's water. They have been cited numerous times for violating the Clean Water Act. Monitoring and oversight must be done during construction and operation to ensure that BMP's and other measures are fully implemented.

We appreciate the opportunity to offer these comments and look forward to your response.

Sincerely,

Jeff Mikulina  
Director, Sierra Club, Hawaii Chapter

cc: Office of Environmental Quality Control

November 13, 2002

Mr. Jeffrey Mikulina, Director  
Sierra Club, Hawaii Chapter  
P.O. Box 2577  
Honolulu, Hawaii 96803

Dear Mr. Mikulina:

Subject: Primary Corridor Transportation Project

This is in response to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS). We are responding to your oral testimony at the October 12, 2000 formal Public Hearing, your October 20, 2000 letter, and your oral testimony at the October 26, 2000 Special Transportation Committee Meeting regarding the MIS/DEIS.

1. The Sierra Club Oahu Group supports the transit plan as detailed in the MIS/DEIS.

Response: Comment noted. It states the commenter's preference for an LPA.

2. By providing more efficient and speedier transit options, the Bus Rapid Transit can make that shift away from automobiles. What this finally does is not only gets the cars out of the way so buses can get to where they're going on time, it does so in a modest, balanced way. If projections are true, as written up in the report, we'll be saving about 40,000 barrels of oil here as well.

Response: Comment noted.

3. Now, the complaint about the loss of lanes, it's really painfully ironic to us when you think about it. We all hate traffic, but we don't want any less of it. Yet we really think that's what this is going to do, by getting rid of this lane and taking the buses to where we're going on time. You know, if you provide for cars, we'll have more cars. If you provide for mass transit, we'll see greater ridership.

Response: Comment noted. It is a statement of opinion.

4. Now, that said, we do have some caveats. Number one, we don't agree with everything in the Draft Environmental Impact Statement, and you'll be receiving our comments within the next couple weeks. We have to make sure that we don't adversely impact recreational areas or trees or the like.

Response: Any adverse impacts to existing or future parks/recreational facilities and/or trees expected to result from this project are discussed in Chapter 5 of the FEIS.

5. *Secondly, we'd really like to strongly encourage that an electronic or hybrid system be implemented immediately and not start with the diesel. You have to do it right the first time so that you don't have to go back and have construction impacts.*

**Response:** The embedded plate technology (EPT) is electric and the hybrid-electric technology is a step forward toward an all electric technology. The initial In-Town BRT fleet will be hybrid-electric. In 2008 a decision on the long-term technology will be made. It could be to continue with a hybrid technology, to convert to EPT, or to adopt some other non-fossil fuel technology such as fuel cell. The current plan is to convert to EPT if it is service proven and cost-effective to do so.

6. *Second, we're really bordering close on the carbon monoxide emissions in some of those key intersections. We want to make sure we have zero emission and buy vehicles which can produce that.*

**Response:** Since the Refined LPA will utilize either zero or low-emission vehicles for the In-Town BRT, it will substantially reduce the level of particulate emissions (black smoke and soot) at certain intersections and street level locations in comparison to the No-Build and TSM Alternatives, which would continue to use diesel buses.

Carbon monoxide levels at key intersections will be generally lower in the Refined LPA than the No-Build Alternative in the year 2025.

Estimated worst-case 1-hour carbon monoxide concentrations at selected intersections are projected to be lower with the Refined LPA than the No-Build Alternative at twelve of the seventeen locations. The transit technology chosen would comply with the EPA's regulations for transit buses, including those powered by diesel engines. It is expected that the emissions from diesel/electric hybrids would be significantly lower than the EPA's requirements.

7. *And finally, this won't work alone. We have to implement other measures. I was impressed to find out that some businesses are offering subsidized bus passes and the like. But we have to work with them and encourage flex time, telecommuting, a strong bicycle component in the transit plan, and also market it heavily. We like how this will encourage mixed use development along the corridor, especially in Kakaako, but we need to maintain green spaces there as well.*

**Response:** DTS agrees with your statement. For example, the City has recently completed a Honolulu Bicycle Master Plan and the City currently participates in the TEA-21 initiative to subsidize transit use. The City also supports the concepts of flex-time and telecommuting.

8. *The Sierra Club, Hawaii Chapter, supports the efforts the City has made in regards to the PUC Transportation plan and would like to see the BRT alternative implemented.*

**Response:** Comment noted. It states the commenter's preference for an LPA.

9. *While electric and fuel cell technology is starting to mature, petroleum-based energy is yesterday's technology. Given greenhouse gas reduction protocols, resource depletion and political vagaries of oil exporting countries, selecting oil-based technology doesn't make sense.*

**Response:** See response to comment #5.

10. *Renewable energy: Hawaii is the most oil-dependent state in the nation. Diesel-burning buses won't help Hawaii make the transition to a renewable-based energy system. An electric transit system could be integrated with a renewable-energy powered grid.*

**Response:** The embedded plate technology will use electricity generated at a HECCO power plant for traction power. Therefore, the BRT would run on renewable energy if renewable resources were used as the energy source for electrical production.

11. *The system should be built right the first time to avoid costly and annoying construction impacts from installing electric systems later.*

**Response:** This will not be possible, since EPT is not yet service proven. Chapter 5 of the FEIS addresses the impacts of the construction for the embedded plate system in the future.

12. *By building a more elaborate setup (instead of just another lane), developers are more likely to follow through with plans on redevelopment of key areas.*

**Response:** The Refined LPA will provide an enhanced transit system with permanent fixed facilities, such as transit centers, transit stops, and the transit lanes that could support desired development patterns.

13. *Carbon monoxide levels at many key intersections will exceed the state's ambient air quality standards in 2025. A zero emission transit system will help to reduce transportation's contribution to the problem.*

**Response:** See response to comment #6.

14. *A zero-emission, quiet, electric propulsion system is much more attractive than a loud, polluting diesel engine. Tourists and residents alike would likely be more attracted to an electric or fuel cell system.*

**Response:** See response to comment #5.

15. *Why doesn't the In-Town transit line - or other components of the BRT - extend to the airport? Will tourists actually have to transfer at Middle Street if they wish to use transit to get to Waikiki?*

**Response:** The BRT is not designed to take tourists to and from the Airport. There are no provisions for baggage on the BRT vehicles and the BRT could not be routed through the airport's central terminal area without major delays to other BRT riders.

There are other city buses (Routes 19 and 20) and private transportation services that provide tourists with access to the Airport.

16. *Why are both In-Town BRT lines so far makai in the Kakaako area? Wouldn't it make more sense to move one of the lines further mauka, especially if it could take advantage of one of the one-way corridors (Beretania or King)?*

**Response:** One reason BRT routings through Kakaako occur where they do is to help spur development of vacant and underutilized parcels. By contrast, most parcels in the S. King

Beretania Street corridor are fully built-up and this corridor is well served by the present bus system. In concert with the BRT project, bus priority improvements will be installed on King and Beretania Streets to even further improve bus service in this corridor.

17. *Joining the in-town BRT transitway with a bikeway offers the following benefits:*
- 1) *Predictability of transit vehicles versus private automobiles for biker safety*
  - 2) *Minimize bike-car interactions*
  - 3) *Minimize transit-car interactions*
  - 4) *Healthier for bikers if zero-emission vehicles are used for transit.*
- An ideal might be to use Young Street as an in-town BRT and bikeway-only street.*

**Response:** Where it is safe to do so, the In-Town BRT exclusive or semi-exclusive lanes will be shared with bicyclists.

18. *How realistic and feasible is the STREAM electric technology for the in-town BRT? Or has this just been added as an enhancement that will not appear in the final transit system?*

**Response:** STREAM is one of three embedded plate power technologies currently under development by different European companies as alternatives to overhead catenary electric power. The safety, reliability, and infrastructure costs of implementing any embedded electric supplied system for the In-Town BRT will be carefully evaluated next to the other environmentally friendly technologies when the final decision on technology is being made.

19. *Aside from transit center parking lots and bike racks offered on buses, how are the TSM and BRT multi-modal? How do they mesh airport and ferry users?*

**Response:** The TSM and BRT (Refined LPA) Alternatives include islandwide bus networks that would be converted to a hub-and-spoke configuration. Hubs in the network will be major destinations and transfer points between different bus routes and between modes. The airport and ferry terminal(s) would be transfer points in the networks.

20. *The Sierra Club is concerned about inducing development on the Ewa plan and central Oahu - especially with more residential development that lacks the components of a smart growth community. Will this plan induce more residential-only construction in these areas?*

**Response:** The Refined LPA is intended to support the land use objectives of the Ewa Development Plan, which seeks to encourage a mix of residential, commercial and employment growth, with the City of Kapolei being developed as Oahu's "second city."

21. *What actions are being taken by the City or State to encourage mixed-use development in the Primary Urban Corridor to reduce separation of living, working, and shopping (or "productive" and "attractive" end-points) to minimize transportation need? Will green spaces in the Kakaako and Keolu Street area be enhanced or preserved?*

**Response:** The Public Review Draft of the Primary Urban Center Development Plan (PUC DP) (June 1998) promotes the concept of "urban villages", a mix of residential, employment and commercial land uses. The public review draft also provides for green spaces throughout the city. The In-Town BRT would support the land use objectives of the PUC DP.

22. *Lead levels should be indicated in units or measuring intervals that are equivalent to the ambient air quality standards.*

**Response:** The unit indicated on Table 3.5-2,  $\mu\text{g}/\text{m}^3$ , for lead is also used on Table 3.5-1, which indicates the National and State Ambient Air Quality Standards.

23. *The presence of endangered species is mentioned on page 3-68, but no mention of impacts or mitigation appears in Chapter 5.*

**Response:** Section 5.7 of the FEIS states that no State or federally listed, proposed, or candidate threatened or endangered plant or animal species described in Section 3.7 is likely to be affected, with the exception of the white tern (*Gygis alba*), which is listed by the State as endangered on Oahu. Sites currently used by white terns on Oahu include Kepioleni Park, Thomas Square, Fort Defuss, Iolani Palace, and parts of downtown and the Capital District. White terns are well adapted to urban environments, and no interaction with adults of this species is anticipated. The primary concern regarding white terns is to avoid disturbing their eggs, which are laid on bare tree branches. A survey of the project area will be conducted for white terns and their nests prior to final design. Sensitive trees and areas will also be monitored immediately prior to and/or during construction activities that involve tree relocation, removal, and/or trimming. All monitoring will be coordinated with the USFWS. DTS will also coordinate tree trimming with the Department of Parks and Recreation, which has standard procedures to avoid impacts to white terns and their eggs.

24. *Much of the impact analysis is based on numbers generated by traffic modeling. Could these analyses of ridership forecasting (Table 4.1-2) and traffic timing be shown? What assumptions were made? What types of models were used?*

**Response:** The travel forecasts for the Primary Corridor Transportation Project were developed using travel forecasting procedures developed for the Oahu Metropolitan Forecasting Model Development Project. These procedures simulate the choices made by residents, business, and visitors regarding the nature, number, mode, time-of-day, and geographic orientation of trips that they make on a typical weekday. The procedures have been developed with data obtained in extensive surveys of Oahu households, transit riders, and air passengers. Future year forecasts reflect the population and employment forecasts that have been prepared by DBEDT and the zonal allocations that have been prepared by the City Department of Planning and Permitting.

The travel forecasting methodology and resulting travel forecasts used for the Primary Corridor Transportation Project are described in Chapter 2 of Product 7-19 Technical Memorandum of Travel Forecasting Results (Final). The transportation plan for Oahu is described in the Oahu Metropolitan Planning Organization's report, Transportation for Oahu Plan TOP 2025.

25. *Number of transfers that are needed (nearly 50% of all transit rides) will be a deterrent to use transit. Transfers should be minimized or other incentives need to be put in place.*

**Response:** Since publication of the MISDEIS, the transit system has been revised to reduce the number of transfers. As shown in Table 4.2-4 in the FEIS, the number of boardings per linked trip (transfer rate) has been reduced from 1.47 reported in the MISDEIS to 1.38 with the Refined LPA.

26. Every incentive possible should be implemented to increase the attractiveness of using transit. For example, electric tracking indicators at the transit stops could be used to convey the estimated time of arrival of the next appropriate bus. Or bus schedules and updates could be made available for use in Palm Pkts via the web, as the Tri-Met does in Portland, Oregon.

Response: Traveler information displays using global positioning technology are planned for at the transit centers and major BRT stops. These displays would include estimated time of arrival for the next bus on each route that stops at that location.

27. Some employers, such as Hawaiian Electric Industries, encourage their employees to use transit through subsidization of bus passes and other incentives. Are any city or state incentives contemplated to ensure that the new transit system will be used to its fullest?

Response: The transit system is currently subsidized by the City as will the new BRT. Additionally, bus passes can be purchased with pre-tax dollars by City and state employees to further reduce the effective out-of-pocket cost.

28. Even under BRT, bottlenecks will occur along primary transportation lines. Screening analysis (Table 4.2-3) indicates that all of the alternatives fail to meet the level of service required at the peak hour. Getting cars off the road must be a main objective in the Primary Urban Corridor transportation plan.

Response: Although it is correct that some screenings will continue to operate at LOS F in 2025 under each of the alternatives considered in the FEIS, the Refined LPA is projected to result in less congestion compared to the other alternatives at most screenings.

29. No bikeways should be taken away with any plan. Honolulu has a long way to go before it can be considered a "bike-friendly" city. Again, joining transitway and bikeway facilities should be considered as an option along many of the routes. Safety concerns are the most often raised issue when it comes to deterrents to biking in town.

Response: The Refined LPA will not displace any existing bikeway facility, such as bike lanes, paths or routes. However, bike lanes on University Avenue would be moved next to the curb due to the removal of on-street parking on this street. To improve bicycling transportation under the Refined LPA, the Hawaii Bicycling League (HBL) was invited to participate in project planning. Where the In-Town BRT lane is curbed, cyclists would be allowed use of these lanes. Where the In-Town BRT lane is in the median, the project would try to establish 14-foot-wide curb lanes where bike lanes are not possible. In terms of future bikeway facilities, as identified in the Honolulu Bicycle Master Plan, the Refined LPA would not preclude any of the suggested projects. The HBL agreed that the Refined LPA would improve bicycle transportation within Honolulu.

30. The carbon monoxide microscale analysis indicates that more needs to be done to reduce human exposure to CO at populated intersections. Clearly, use of alternative technology, such as electric or fuel cell propulsion, would reduce the localized emission of CO and other pollutants.

Response: See response to comment #6.

31. The in-town BRT has an opportunity to foster a distinct "sense of place" in Honolulu. This could be done by clearly indicating the ahupuaa on the transit maps, allowing surfboards on the buses (racks along the side?), and planting native trees and plants along the routes.

Response: There is a limit to how much information can be placed on a transit map and still have it be useful to riders. While having ahupuaa indicated on some circular bus route maps could be helpful, it would not be as useful information for BRT riders as would denoting street names, landmarks, transfer points, etc.

With regard to allowing surfboards on BRT vehicles, this is not proposed due to the danger to passengers and their potential to block aisles. There is no place to put surfboard racks on the side of a bus where it would be safe for passengers waiting at platforms, or for motorists and bicyclists in the adjacent lanes.

Decisions on the types of specific plantings along the route will be made during the final design phase.

32. Although we support the BRT alternative, is there anything preventing the bus propulsion improvements (electric or hybrid) for the TSM or no-build alternative? This analysis seems to be absent.

Response: While it could be done, it would be inconsistent to consider embedded plate technology with the TSM and No-Build Alternatives because of its higher cost. Hybrid-electric vehicles could be part of the TSM and No-Build Alternatives along selected routes where noise and air quality are particularly sensitive issues.

33. With regards to the annual oil savings the BRT vs. no-build and TSM, the assumption appears to be that all private autos will use similar fuel and achieve similar gas mileage in 2025 as they do in 2000. Is this true?

Response: The analysis assumes a worst-case scenario and utilizes the most recent (at the time of analysis) energy consumption factors for U.S. transit systems and roadway networks (published in the Transportation Energy Book by Oak Ridge National Laboratory). The consumption factors (BTUs/MAT) take into consideration the various fuel types used by passenger vehicles (auto, van, light truck). Estimates of improved vehicle energy consumption from 2000 to 2025 are not included in the conversion factors. The analysis identifies the net impact on energy savings as a result of changes in auto and commercial travel in the region, offset by the energy requirements for operation of the BRT or TSM alternatives. This is an approved method utilized and prescribed by the FTA.

34. The electricity demand for an all-electric in-town BRT is estimated at 11.3 MW. It is difficult to believe that this can be met with the utility's "reserve" capacity. According to the Hawaii Energy Strategy (DBEDT, 2000), Oahu is planning to install 605 MW of additional generating capacity before 2017, most of it from coal sources. How can the 11.3 MW come from "reserve" capacity?

Response: Coordination with HECO has confirmed that HECO has adequate reserve capacity today without constructing a new power generation unit. The additional generating capacity needed in the future will be needed to serve the growth in population forecast by DBEDT independent of the primary corridor project.

35. Will substations need to be constructed to feed electricity to the in-town BRT? Where will they be located? How will this affect the need for the Kamoko-Pukele 138 kV power line project proposed for Waahala Ridge?

Response: Traction power supply substations will be required if the embedded plate technology is used. The physical description of the substations and related impacts are discussed in the FEIS. The Primary Corridor Transportation Project and the Kamoku-Pukele 138 KV power line project are totally unrelated.

36. The Hawaii Department of Transportation Water has a terrible record when it comes to protecting Hawaii's water. They have been cited numerous times for violating the Clean Water Act. Monitoring and oversight must be done during construction and operation to ensure that BMPs and other measures are fully implemented.

Response: DTS is not aware of a Hawaii Department of Transportation Water, nor of said department's "terrible record...protecting Hawaii's water."

BMPs, including monitoring and oversight of construction activities, will be conducted as required by the conditions of all permits required under the Clean Water Act. As stated in Section 5.8.5 of the FEIS, it is anticipated that some alterations to bridges or streams may be necessary. Appropriate best management practices will be implemented to ensure adherence to standards set forth under the Clean Water Act. If the project were to involve the discharge of dredged or fill material, a Department of the Army permit would be required and appropriate coordination with the ACOE will be conducted.

37. I'd like to come out in support for the Bus Rapid Transit Alternative of the Primary Corridor Transportation Plan.

Response: Comment noted. It states the commenter's preference for an LPA.

38. What this plan does in a modest and balanced way is help make that shift away from private autos and onto transit. Like providing more efficient and speedier transit options you can help make that shift.

Response: Comment noted.

39. What this plan does is get the automobiles out of the way so the buses can run on time and that's a chronic concern from transit users is the unpredictability of transit and they who know when we can get there, stops at every corner. And if these projections hold, the plan will save nearly 40,000 barrels of oil a year as well.

Response: Comment noted.

40. Just two things I'd like to highlight. Number one is the in-town system. And I would encourage implementation of an electric or fuel-cell technology as soon as possible. Other cities in this country and the world are doing it. They're working today. I've wrote about five reasons why this is a necessity. We're the most dependent state in the nation on imported petroleum. It's also much more attractive is zero-emission quiet vehicle. And after sucking bus fumes all day biking around, I can attest to definitely a better way to go.

Response: Technologies proposed for the Refined LPA include embedded plate technology (EPT) which consists of electric vehicles powered by a wayable traction power delivery system or hybrid-electric propulsion system where energy for the traction power is carried on-board the vehicle. EPT vehicles would emit zero emissions. The hybrid-electric vehicles would be low-emission vehicles because their diesel engines would always be operating at efficient levels.

The FEIS has been prepared to permit either option to be selected later in the project development process by reflecting the "worst case" impacts of the two technologies. The FEIS does not preclude an alternative technology such as fuel cells to be considered in the future. Although hybrid-electric technology has been chosen for the initial fleet of In-Town BRT vehicles, in 2008 when a decision on the long-term technology is made, other technologies including EPT and fuel cells will be considered.

41. And the second thing I want to bring up is the in-town transit way. Folks in redevelopment and places that we want to do some more growth so we can produce the pressure on outlying areas.

Response: The In-Town BRT will help provide the opportunity to focus development in the Primary Urban Center (PUC).

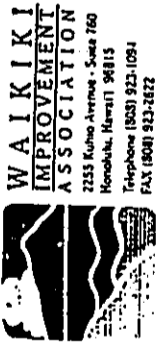
We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6876. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director





Enhancing Waikiki since 1967

October 5, 2000

**TO:** The Honorable Duke Bainum, Chair  
City Council Transportation Committee


**RE:** Special Transportation Committee Meeting (Oct. 5, 2000)  
*Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) for the Primary Corridor Transportation Project*

Chair Bainum, members of the Committee:

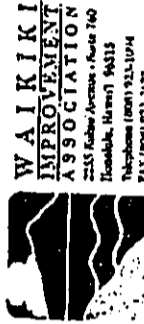
I am Rick Egged, President of the Waikiki Improvement Association, representing 250 businesses and individuals in Waikiki. WIA continues to support the City's plans for improving transportation connections island-wide. Indeed, our traffic is getting worse every day. Doing nothing is not an option. The current proposals were designed with a lot of community input, including WIA. Our Board of Directors approved the proposal in concept, including a high capacity transit system for Waikiki, and has continued to follow its development. According to the MIS/DEIS just completed, the CityTram will help achieve our overall goal of improving traffic flow and access into Waikiki at a cost that appears to be reasonable to taxpayers. It also improves connections for Waikiki employees getting to and from work. As long as ride schedules can be aligned with Waikiki's 24-hour-a-day work schedule, the new system should offer a fast, efficient choice for the Waikiki workforce. An independent cost-benefit and economic impact analysis has measured the benefits, too, in areas such as travel time and saved operating and parking costs at a benefit/cost ratio of 1.24.

However, we do have concerns about the dedicated transit lane in certain portions of Waikiki where Kalakaua Avenue and Kalia Road are already narrow. We hope to work with the City on alignment and use of the lanes.

WAIKIKI IMPROVEMENT ASSOCIATION



Rick Egged  
President



Enhancing Waikiki since 1967

November 14, 2000

**TO:** Duke Bainum, Chair  
City Council Transportation Committee


**RE:** Resolution 00-249 Selection of a Locally Preferred Alternative for the Primary Corridor Transportation Project

Chair Bainum, members of the Committee:

I am Rick Egged, President of the Waikiki Improvement Association, representing 250 businesses and individuals in Waikiki. WIA continues to support the City's plans for improving transportation connections island-wide. Our Board of Directors approved the proposal in concept, including a high capacity transit system for Waikiki, and has continued to follow its development. According to the MIS/DEIS just completed, the City Tram will help achieve our overall goal of improving traffic flow and access into Waikiki at a cost that appears to be reasonable to taxpayers.

We do, however, have concerns about the dedicated lane affecting traffic flow and accessibility along Kalakaua Avenue, where the traffic balance is delicate and uses are many. Determining its configuration is important in servicing all of Waikiki's customers--businesses, visitors and residents. We hope to work with the City on the alignment and use of this important corridor.

WAIKIKI IMPROVEMENT ASSOCIATION



Rick Egged  
President

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
630 SOUTH KING STREET, 900 FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 523-4520 • Fax: (808) 523-4720 • Internet: www.cc.honolulu.hi.us

JEREMY HARRIS  
MAYOR



CHEERYL D. SOON  
DIRECTOR

GEORGE YEKOKI \* MIYAMOTO  
DEPUTY DIRECTOR

TPD1100-05460R

November 13, 2002

Mr. Rick Egged, President  
Waikiki Improvement Association  
2235 Kuhio Avenue, Suite 760  
Honolulu, Hawaii 96815

Dear Mr. Egged:

Subject: Primary Corridor Transportation Project

This is in response to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your October 5, 2000 letter, your November 14, 2000 letter, and your oral testimony at the November 14, 2000 Special Transportation Committee Meeting regarding the MIS/DEIS. Part B responds to your oral testimony at the April 20, 2002 public hearing and your May 7, 2002 letter regarding the SDEIS.

Part A - MIS/DEIS Comments

1. According to the MIS/DEIS just completed, the CityTram will help achieve our overall goal of improving traffic flow and access into Waikiki at a cost that appears to be reasonable to taxpayers. It also improves connections for Waikiki employees getting to and from work. As long as ride schedules can be aligned with Waikiki's 24-hour-a-day work schedule, the new system should offer a fast, efficient choice for the Waikiki workforce.

Response: Comment noted, the project is in agreement with this statement.

2. However, we do have concerns about the dedicated transit lane in certain portions of Waikiki where Kalanika Avenue and Kalia Road are already narrow. We hope to work with the City on alignment and use of the lanes.

Response: In the public outreach for the Project, DTS established a Working Group (WG) for the Waikiki area that included representatives from the hotels, retail and service industries, commercial passenger and freight carriers, and residents. One topic of discussion was the proposed BRT lane configurations for the various segments in Waikiki. The lanes on Kalanika Avenue and Kalia Road have been modified in the Refined LPA based on the Waikiki WG input so that they are shared with private buses and right-turning vehicles.

3. WIA continues to support the City's plans for improving transportation connections island-wide. Our Board of Directors approved the proposal in concept, including a high capacity transit system for Waikiki, and has continued to follow its development. According to the MIS/DEIS just completed, the City Tram will help achieve our overall goal of improving traffic flow and access into Waikiki at a cost that appears to be reasonable to taxpayers.

Mr. Rick Egged  
Page 2  
November 13, 2002

Response: Comment noted. It is a statement of the commenter's preference for an LPA.

4. We do, however, have concerns about the dedicated lane affecting traffic flow and accessibility along Kalanika Avenue, where the traffic balance is delicate and uses are many. Determining its configuration is important in servicing all of Waikiki's customers - businesses, visitors and residents. We hope to work with the City on the alignment and use of this important corridor.

Response: See response to comment #2.

Part B - SDEIS Comments

5. I'm the president of the Waikiki Improvement Association. We're an organization made up of businesses and landowners in Waikiki.

Response: No response required.

6. And certainly, we support a system that increases service to Waikiki, a system that will help our employees who come in and out of Waikiki every day, including myself, get to our jobs in a faster and more efficient way.

Response: Comment noted. It is a statement of support for the Refined LPA.

7. And what we're also looking at is a way of enhancing Waikiki as a visitor destination. And the things that - some of the things that we find very attractive about this system are reducing the total number of buses - City buses that traverse Waikiki, being able to replace a lot of those buses that are there now with a much more efficient system, and with the current diesel buses, which, of course, are noisy and polluting, with a much more modern system of buses which would be quieter and certainly create less fumes. Just the fact that we just instituted a business improvement district in Waikiki - and I don't realize, before we started cleaning the sidewalks, that sidewalks weren't gray. Certainly, all of the pollution that comes from all of the traffic in Waikiki is your lane from all of the carbon that comes from the exhaust systems can get to be a problem. So, certainly, to be able to take a step forward into the future and create a system that is more environmentally friendly is important to all of us.

Response: Comment noted. DTS agrees with this comment, nor does it require any changes to the EIS.

8. And when it comes down to it, when we're looking at Waikiki, Waikiki is not just another community. Waikiki is an important economic center for the island. And for us, we're looking at a pedestrian environment. The streets in Waikiki, the sidewalks in Waikiki, are the busiest sidewalks in the state. It's an important urban center. We have to be able to create an environment that is friendly to those pedestrians.

Response: This comment is consistent with findings in the FEIS.

9. And to do so by creating a more efficient transportation system that will take buses off the road, allow us to expand sidewalks and increase landscaping in Waikiki, is something that will benefit certainly all of the residents, as well as the visitors in Waikiki, and really support the economic base for the entire community.

Mr. Rick Egged  
Page 3  
November 13, 2002

**Response:** This comment is consistent with findings in the FEIS.

10. *I've listened to all the concerns that have been said here today. And, of course, the BRT is not a perfect solution. I don't know if there ever is a perfect solution. Every time I've heard suggestions made, there are always a lot of reasons why something won't work.*

**Response:** Comment noted.

11. *I have to say that I really appreciate all the effort by the Department of Transportation Services to work with the community. I feel that there's certainly been enough notification, that if you didn't know this process was going on, then you weren't paying attention. And we have found the process to be very iterative and responsive. And I enjoy our continuing effort to work on making the system work.*

**Response:** DTS appreciates your support of its public involvement efforts and looks forward to working with the Waikiki Improvement Association in the future.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Path Miyamoto at 527-8976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

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**Final Environmental Impact Statement**

**Primary Corridor Transportation Project**

**Chapter 7.0**  
**Comments and Responses**  
**Businesses**



WRITTEN TESTIMONY OF DWIGHT YOSHIMURA  
BEFORE THE HONOLULU CITY COUNCIL TRANSPORTATION COMMITTEE  
IN SUPPORT OF THE BUS RAPID TRANSIT (BRT) PROGRAM  
OCTOBER 26, 2000

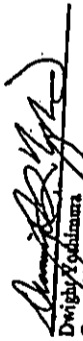
To Chairman Duke Blum and other members of the Transportation Committee:

I am writing in support of the proposed Bus Rapid Transit (BRT) program as our locally preferred alternative to improve our existing rapid transit system. As general manager of Ala Moana Center, a major connecting point for Honolulu's bus system, I can attest to the need for improvements to address the increasing demands being made on our roadways and existing public transportation system. Of the three alternatives under consideration, we believe the BRT program, with its high-capacity in-town centers, offers an environmentally friendly and attractive alternative for drivers.

The one area of concern for Ala Moana Center would be the designation of dedicated lanes for this system along Kapiolani and Ala Moana Boulevard, as both thoroughfares are primary arteries and direct feeder lines to and from the shopping center. We would therefore request the Council also consider a semi-dedicated use, which would allow vehicular traffic onto the lanes at those times when they are not in use by the BRT vehicles, as is now done in some U.S. mainland cities. We believe this would facilitate even greater traffic flow along those roadways.

In conjunction with our support of the BRT system, we also support and urge the City to address modifications to the Atkinson/Kapiolani intersection (as was earlier proposed by the City), as well as any other needed improvements to will help the overall traffic flow in the Ala Moana area.

Thank you for your time and consideration of this testimony.

  
Dwight Yoshimura  
General Manager, Ala Moana Center

Address: 1585 Kapiolani Blvd., #800 • Honolulu, HI 96814  
Phone: (808) 946-2311

(submitted via facsimile 10/24/00)

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 522-4328 • Fax: (808) 522-4730 • Internet: www.ctd.honolulu.gov

REGULATORY  
DIVISION



CHERYL D. SOON  
DIRECTOR

GEORGE NEGON IRIKUMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD1000-05178R  
TPD11700-05327R

Mr. Dwight Yoshimura  
General Manager, Ala Moana Center  
1585 Kapiolani Boulevard, #800  
Honolulu, Hawaii 96814

Dear Mr. Yoshimura:

Subject: Primary Corridor Transportation Project

This is in response to your October 26, 2000 fax regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. I am writing in support of the proposed Bus Rapid Transit (BRT) program as our locally preferred alternative to improve our existing rapid transit system. As general manager of Ala Moana Center, a major connecting point for Honolulu's bus system, I can attest to the need for improvements to address the increasing demands being made on our roadways and existing public transportation system.

Response: Comment noted.

2. The one area of concern for Ala Moana Center would be the designation of dedicated lanes for this system along Kapiolani and Ala Moana Boulevard, as both thoroughfares are primary arteries and direct feeder lines to and from the shopping center. We would therefore request the Council also consider a semi-dedicated use, which would allow vehicular traffic onto the lanes at those times when they are not in use by the BRT vehicles, as is now done in some U.S. mainland cities. We believe this would facilitate even greater traffic flow along those roadways.

Response: The exclusive and semi-exclusive BRT lanes on both Ala Moana Boulevard and Kapiolani Boulevard are needed by BRT vehicles to avoid congestion which occurs during much of the day on these arteries. The lanes on Ala Moana Boulevard will be shared with private buses and trolleys. The Koko Head bound lane will also be available for right-turning vehicles. There will not be any need to allow other vehicles to use these lanes during other times of the day because traffic volumes will be less during off-peak times on both streets.

3. In conjunction with our support of the BRT system, we also support and urge the City to address modifications to the Atkinson/Kapiolani intersection (as was earlier proposed by the City), as well as any other needed improvements to will help the overall traffic flow in the Ala Moana area.

Response: The Atkinson Drive/Kapiolani Boulevard intersection will be improved by providing an additional left-turn lane from Ewa-bound Kapiolani at Atkinson Drive.

Mr. Dwight Yoshimura  
Page 2  
November 13, 2002

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6978. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

APR 20 2002

ARCHITECTS  
HAWAII  
LIMITED

HONOLULU  
Pacific Tower, Suite 300  
1001 Bishop Street  
Honolulu, Hawaii 96813  
Telephone (808) 523-9636  
FAX (808) 521-3280  
E-mail: shh@architects-hawaii.com

Ms. Cheryl Soon  
Director  
Department of Transportation Services  
City & County of Honolulu  
711 Kapiolani Boulevard  
Honolulu, HI 96813

Subject: Honolulu -  
Bus Rapid Transit System - In Support Of

Dear Ms. Soon:

This letter is in support of the Bus Transit System for the following reasons:

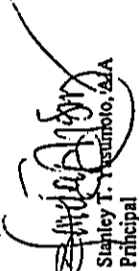
Personal Time Savings

Especially for those who work and need to commute between home and work, the quality of life for them and their families is very dependent on a good transportation system. Each hour saved each day may be a quality hour to be shared with their children. An hour each day which may make the difference in the development of these children into good individuals and good citizens.

Air Quality

Diesel fuel combustion impacts our air quality. Significant reduction of this pollution certainly improves the environment for good health for all of us and increases the appreciation of our State by the many who visit here and make our lives here possible.

Respectfully,



Stapley T. Yegumoto, AIA  
Principal

STY/dha

Joseph Farrell AIA  
David A. Miller AIA  
Stanley T. Yuzumoto AIA  
N. Robert Hale AIA  
Dennis Dashi AIA  
Wilbur H. Marooka AIA ACHA  
Lloyd T. Anahulu AIA  
Matthew W. Giberson AIA  
Arono M. Lucio AIA  
Charles K.Y. Chan AIA  
Bernina McBeath AIA  
Alan L. Robinson AIA CSI  
Emile C. Alano AIA  
Dean S. Uehara AIA  
William A. Reizer AIA  
Ernest S. Shimizu AIA  
W. Terry McFarland AIA  
Karem M. Marooka IIDA  
EMBERTUS  
Francis S. Haines FALA  
Paul D. Jones FALA  
Alex Wamuzisa AIA

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU  
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HONOLULU, HAWAII 96813  
Phone: (808) 523-4129 • Fax: (808) 523-4170 • Website: www.ci.honolulu.hi.us



JEREMY HARRIS  
SAVON

CHERYL D. SOON  
DIRECTOR  
GEORGE WEDDO MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00527

November 13, 2002

Mr. Stanley T. Yasumoto  
Principal  
Architects Hawaii, Ltd.  
Pacific Tower, Suite 300  
1001 Bishop Street  
Honolulu, Hawaii 96813

Dear Mr. Yasumoto:

Subject: Primary Corridor Transportation Project

This is in response to your April 19, 2002 letter regarding your comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. **Personal Time Savings** - Especially for those who work and need to commute between home and work, the quality of life for them and their families is very dependent on a good transportation system. Each hour saved each day may be a quality hour to be shared with their children. An hour each day which may make the difference in the development of these children into good individuals and good citizens.

**Response:** Thank you for supporting the project.

2. **Air Quality** - Diesel fuel combustion impacts our air quality. Significant reduction of this pollution certainly improves the environment for good health for all of us and increases the appreciation of our State by the many who visit here and make our lives here possible.

**Response:** We agree and although Honolulu's air quality is within the State and federal air quality criteria, the project will help maintain air quality below these criteria.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director



MAY 9 2002

April 27, 2002

Ms. Cheryl D. Soon, Director  
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FEDERAL TRANSIT ADMINISTRATION  
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Comments of Charley's Taxi Radio Dispatch re  
Primary Corridor Transportation Project  
Supplemental Draft Environmental Impact Statement

Dear Ladies:

We definitely agree about the urgent need for transportation and public transit improvements. On the other hand, we cannot blindly support a radical, ill-conceived project such as the in-town portion of this proposed BRT.

WHO NEEDS BRT?

To justify this project on the pretext of "if we don't, we'll have Gridlock" is shibboleth in the first place, traffic congestion today is worse than it should be.

A few examples:

- Road and highway improvements have long been ignored so that our road miles per vehicle, and road miles per capita are the lowest in the nation.
- In West and Central Oahu, not enough roads and alternative access roads have been built to keep up with new housing developments.

- Improvements to bottlenecks are ignored for one excuse or another.
  - (a) Why not widen and improve H-1? "The bridges don't meet federal safety standards, it will cost us more to rebuild the bridges to comply."
  - (b) Why not extend the makai freeway (to Pacific Street) or double-deck Dillingham perhaps? "Out of the question, double-decking is unacceptable!"
- Streets have been sold or closed, or narrowed, and more are being turned into hazardous roundabouts.
- Waikiki's one-way street system has shrunk the available use of existing road capacity, exacerbating congestion. Suggestions to narrow side street openings in Waikiki, to wind up as semi-private courtyards, are raised from time to time.
- Reversible contraflow lanes like Kapiolani, possibly on Dillingham as well as King streets (among others), could increase peak traffic carrying capacity.
- Unsynchronized traffic lights bunch up traffic, leaving many empty blocks in-between gaps.
- Not enough "busbays" (bus pullouts) are provided which could free up curb lanes all over town, for smoother flowing curb lane traffic, while providing bus drivers more time and space to load and unload bus passengers.
- The state DOT's planned widening of Ala Moana at the entrance to Kalakaua was stopped at the last minute at the city's insistence. That extra laneway would have shortened traffic backed up to Alkinson or Piikoi. This was an opportunity to have the extra lane plus the pedestrian promenade, as space is available.
- Hundreds of tour buses and vans — enough to more than double the city's fleet — sit idle during peak traffic. These assets are available for immediate use to fill the public's demand for more buses in remote, outlying neighborhoods. People drive because there is not enough express buses. Riders wait in vain for buses that don't show up or show up late, thus unreliable for workers needing to get to work on time.
- Restrictive laws prevent the innovation of jitney and shared ride services to supplement services to neighborhoods and for the low income, unemployed, elderly and disabled. The city simply focuses on the East-West corridor, ignoring services to the Mauka-Makai neighborhoods where people actually need to go.
- Parking and loading areas, and discounted parking fees, are needed for private drivers to form carpools with passengers going in the same direction.

Secondly, "Gridlock" is being artificially expedited, purposely contrived and exploited to give the city's Tram a monopoly of the roadways. BRT will doom private motorists and their passengers to intolerable traffic congestion — permanently inconveniencing all except the riders in The Tram system.

#### CONTRADICTIONS & INCONSISTENCIES

On Kalakaua Avenue, space and time allocated for delivery truckers and tour drivers in motorcoaches, minibus, vans and limousines are greatly diminished today compared to two years ago. Daytime loading is barred from 9 A.m. to 10 P.m. The city's DTS directs the police (HPD) to issue parking tickets to truckers in Waikiki, causing losses in fines and time in traffic court.

Yet, the city would condemn and bar the public's access to certain lanes on major roads in the urban Honolulu core on a massive scale — a part of which is to take over a whole lane (or two) for the entire Waikiki corridor for 21 hours a day. How can there not be space enough now to accommodate the current needs of the commercial transportation drivers, and yet have more space and time for the BRT?

The city contends it can afford to operate BRT 21 hours a day, every 3-5 minute. How, then, is it that the city isn't giving even half or one third that kind of coverage now to the people of West, Central, Leeward and Windward Oahu, even in town?

The city proposes this BRT system to start and concentrate on the Waikiki end.

But, if the intent is to serve resident taxpayers (and not tourists), why not focus on where the need is greatest, in West, Central and Leeward Oahu, where the public needs more bus seats now.

This BRT is predicted to boost ridership, even though riders on regular bus routes will sit in the same worsened traffic as the rest of us.

How can the city count on increasing patronage by having dissatisfied customers? What is the impact also on the Handi-van services, services for the people who need to go for medical treatments and in emergencies?

It is misleading to call a "bus" a "tram" as in BRT ("Bus Rapid Transit").

A bus doesn't need to run on a track, and a bus can overtake stalled vehicles. This proposed Tramway is fixed, inflexible, permanently unalterable (until you pull up the tracks), and stops all the cars behind any broke down tram ahead. A tram is impractical, as more efficient vehicles are available. Claims about time savings by tripping the traffic signals are overstated as pedestrians take time to cross the streets. Even now, the walk signals turn off after only 2-3 seconds, making streets pedestrian unfriendly.

*Re breakdown:* A frequent sight to see in San Francisco is riders pouring out of numerous electric trolleys stopped behind a broken down trolley ahead. *Re exclusive dedicated lanes:* When the Tram broke down in Denver's shopping district, we couldn't get a taxi as all other vehicles are banned from the street.

#### CAN TAXPAYERS AFFORD IT?

The capital cost is the cheapest part of the equation. The biggest burden for property tax payers is the cost to operate and maintain this tram system, adding significantly to the city's bloated budget. We question the city's claim that public subsidy of the city's transit system will not necessitate further tax increases.

Budget constraints will predictably endanger the integrity of the existing bus system:
 

- to cut back on schedules (shorter hours, longer waits and delays for customers)
- cut down on routes (less places served)



- job layoffs and/or
- no pay increases for TheBus and Hand-van employees).

#### ANTI-BUSINESS STRATEGY

Businesses are fast becoming the Endangered Species in Hawaii! The approach of this project's DEIS and SDEIS further demonstrate government's anti-business climate in Hawaii. There is no consideration of the potential jobs to be lost, or of the customers inconvenienced, the services to be degraded, and the private sector to be displaced. Transportation is not about one mode (tram or bus). The public roads and highways are built to promote mobility for diverse purposes and uses, whereas the BRT in-town is intended to provide public transit with a monopoly of the major roads in the urban core.

Why is there is no consideration of the Business Economic Impact of BRT on businesses:

- on property owners and tenants
- on minority and disadvantaged businesses
- on stores and restaurants,
- on patients, doctors and medical services
- on schools and special education services
- on riders of private commercial vehicles, or goods and deliveries by truckers
- on the convention clientele, on tourists in general, on the businesses who sell tour attractions and activities
- on everyone else who uses the streets and roads?

Displacement of private commercial operators. Why is city allowed to ignore the impacts upon other uses:

- some customers who are injured or sick and going to the doctor and have to pay more waiting time because the city takes away traffic lanes and congests up the streets?
- slow-moving elderly and handicapped customers?
- taxi drivers having to unload infant strollers and grocery bags?
- truckers making deliveries having to truck 2 blocks going and coming to their customers?
- melting ice cream belonging to the grocery store customer stuck in traffic due to bumper to bumper traffic?
- taxi riders having to pay more as the meter keeps on ticking in traffic congestion.
- Degradation of services to taxi customers as it will take longer for the driver to arrive at the destination due to traffic congestion?
- taxi drivers having to work longer hours to make the same number of trips as now, because they will be sitting in traffic?
- why should our customers be inconvenienced and pay more, over the interests of bus riders?
- why is the city going to make it so inconvenient and expensive to ride our non-government subsidized taxis?

- why are the interests of tram riders having priority over our taxi customers? the cumulative effect of traffic congestion, here, there and everywhere, at or near where the BRT system runs are definitely going to degrade our services unacceptably. The taxi business is time-sensitive, in other words, most customer call at the last minute, just before they need a ride. Our taxis go where and when most of the city buses don't go. But our drivers will be stuck in intolerable traffic congestion, a half-hour longer on Kapiolani, 20 minutes longer on Nimitz, 20 minutes more wherever the Tram goes near. So, our drivers will have to work more hours as the number of trips per hour falls, plus more stress (individual), and wear and tear (cars). BRT doesn't even have to take our customers, the drivers will quit anyway in frustration!
- why is the government pouring government funds to displace private sector transportation companies, by degrading our ability to service our customers at existing levels, so as to shift our customers into this BRT? Is it fair or legal for the monopoly government bus service to drive private small businesses out of business? Giving preference to the BRT over taxi riders is unfair competition, especially since taxi riders' fares are non-subsidized
- is the city violating the federal transportation department's policy to have Private Sector Participation in the formulation of an improved transit system, when in fact we have been ostracized and excluded as much as possible in the work planning details? Other transportation operators have told me that they were told not to attend BRT meetings, not to express objections to the BRT at OMFO policy meetings, and also that the Waikiki Working Group was "by invitation only". As a major taxi company in Honolulu, our company has been specifically ostracized by the city and its consultants, except in these very superficial public meetings. We are specifically excluded from working groups. I also attended a Waikiki Livable Community meeting, where we were told that BRT is a "given", not up for discussion. I wrote comments and never got even a thank you response. why should the 92% of Oahu residents who don't ride the system pay for the addition of nice new trams for tourists?
- How much longer will it take for guests to wait for their pick-ups or for their cars at Moana and Surfside, if it already takes 30-45 minutes now? What is the impact of the BRT in Waikiki upon these and other hotels and restaurants and stores?

#### SIGNIFICANT, DIVERSE, IMMEDIATE SOLUTIONS ARE AVAILABLE

- Many other more worthy projects are being subordinated or ignored, due to the significant expense of the BRT project. We need more streets and alternative access roads to keep up with the increased development of homes in West Oahu.
- Supplement the city-owned fleet with available tour buses and vans, to double carrying capacity. Honolulu is unique to have one of our nation's biggest supply of buses per capita, except for NYC and Washington DC. This available asset (of tour buses) is being wasted, sitting idle during morning peak hours (before morning tours).

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DEPUTY DIRECTOR

TPDS02-01876R

November 13, 2002

Ms. Dale Evans  
Charley's Taxi  
680 Ala Moana Boulevard, Suite 303  
Honolulu, Hawaii 96813

Dear Ms. Evans:

Subject: Primary Corridor Transportation Project

This responds to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your oral testimony at the October 5, 2000 Special Transportation Committee Meeting regarding the MIS/DEIS. Part B responds to your oral testimony at the SDEIS April 20, 2002 Public Hearing and your April 27, 2002 letter regarding the SDEIS.

Part A -- MIS/DEIS Comments

1. *Charley's Taxi wants to see improvement in transportation. And we would also like to see that the State and City work together for solutions. Our concern is about congestion. We feel that traffic in Waikiki and elsewhere is terrible and that it will even get worse with the proposal.*

**Response:** It is not the BRT that will create the congestion. The congestion for motorists will be there without the BRT. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

2. *We like some of the things that the private transportation industry suggested which was the zipper lanes, the \_\_\_\_\_ buses, the contraflow lanes. But, we really feel that the highway on and off ramps need to be addressed and how you handle transportation.*

**Response:** The Refined LPA includes a Regional BRT component that extends from Kapiolani to Middle Street and includes the extension of the existing A.M. Zipper Lane, and addition of a P.M. Zipper Lane. In addition, BRT priority improvements will be made to existing or proposed ramps at Kapiolani, North-South Road, and Middle Street to facilitate movements from H-1 to the transit centers at these locations. In addition, an exclusive BRT ramp will be constructed at Luapele Drive to serve the Aloha Stadium Transit Center. These ramp improvements are an integral part of making the BRT a fast reliable alternative to the private automobile. The ramp improvements will allow the BRT vehicles easier access to the zipper and express lanes.

- Use reversible HOV contraflow lanes for use by all hoves, not only the transit buses.
- The estimated 30% of uninsured motorists should be taken off the streets. The city's licensing division knows who they are, but nothing is being done, so we all have to pay premiums for uninsured motorists insurance due to the bureaucratic failures.
- Use incentives to encourage private carpools, by discounted parking, priority use of parking places to pick-up other riders in car pools. (Private carpools save taxpayers the inefficient expense of hiring more bus drivers and mechanics and buying and garaging more buses.)
- Clear off accidents faster to re-open roads and highways. Set a maximum so that the roads are closed for hours at a time creating security problems and inconvenience and loss for everyone stuck in the traffic.
- Put in more Busbays so that the buses can pull out of the curb lane to load and unload bus riders. This would immediately add carrying capacity to existing streets.

The proposed BRT in-town is unacceptable and impractical and offers no solutions to our island traffic and transportation needs. However, it will take a change in public policy to change the practice of furthering the monopoly transit operator, to instead use and manage the island's available assets and resources more efficiently, to have meaningful transportation improvements -- for the general public interest.

We're willing to help.

Sincerely,

Dale Evans, President

3. The narrowing of Kalakaua Avenue has really made traffic unbearable. It's terrible. It has affected the consumer. They're paying more in terms of higher fares. They're paying more in terms of time stuck in traffic. It's costing us more because it's harder for us to cover calls. And ours is a demand-response [business].

**Response:** The BRT will share the curb lane on Kalakaua Avenue with right turning vehicles and with private buses.

4. We also think that the bus system should look at cross-hatches (?) like in San Francisco or other places where it's going this way instead of just going East/West. So, we think that a broader perspective is necessary.

**Response:** The In-Town BRT is only one element of the transit plan for the Primary Urban Center. The plan also includes conversion of the bus system to a hub-and-spoke network. The hub-and-spoke network will consist of new local circulator routes, as well as continuation of many existing line haul and express routes. The goal is to have an integrated network of transit services that provide convenient and cost-effective options for potential users.

5. We're concerned about taking one of the lanes on Kalakaua Avenue which is going to worsen it there. We know that they want to widen the sidewalks on Kulo and therefore that's probably going to take one lane. Then you're about taking two lanes or one lane for this rail system. And we think that it's going to really cause a lot of misery.

**Response:** Since publication of the MIS/DEIS, the City has worked with the Waikiki Working Group and other interested parties in the Kalakaua and Kulo Avenue corridors to redesign the BRT in Waikiki to minimize impacts on vehicular traffic on both streets and to maximize opportunities for widening sidewalks on Kulo Avenue. Changes include allowing four buses and right turning vehicles to share the BRT lane on Kalakaua and Kulo Avenues, and providing for a minimum of a combined eight feet of sidewalk widening on one or both sides of Kulo Avenue. As shown in FEIS Table 4.2-7, the impacts of the BRT on traffic congestion in Waikiki will not be significant.

6. So, maybe what you folks should consider is if you're gonna have this, whatever it is, maybe it should go around. Go down Kapiolani and come up Kulo so that you're not going to take the lane on Kalakaua Avenue. And also it gives a chance for people to get the Iolani School, Kaimuki School, that corridor is terribly congested. So, if they're going to take away the golf course, maybe they should be looking at how to realign a route that could go in a circle instead of going in a circle in Waikiki.

**Response:** Prior to selection of Kalakaua and Kulo Avenues as the Locally Preferred Alternative route in Waikiki, DTS analyzed a variety of alternate routes including: (1) two-direction service on Kulo Avenue; (2) a Kulo Avenue-Ala Wai Boulevard BRT couplet; (3) a Kalakaua Avenue-Ala Wai Boulevard BRT couplet; and (4) turning back BRT service at or near Saratoga Road and Kalakaua Avenue. None of these alternatives provide anywhere as good a service to residents and employees in central Waikiki as the Refined LPA route.

7. We have a lot of doubts about a system that is untested. We believe that the buses is a better way to go. It's more flexible. And I think that you folks should be looking at what the consumer, the people that are not only the bus riders, but... And the bus riders that are the employees and the visitors. But the other people because the bus system really addresses about 8% of the total

usage. So, the rest of the 92% is not being addressed. That's not going to solve a transportation problem. We need to look at the cars, the people that are using the other modes of transportation and how are we going to address those needs. That's what we would call a real transportation solution.

**Response:** The BRT is not the only transportation improvement proposed. It is only one element in a comprehensive set of multi-modal improvements planned for in the Oahu Regional Transportation Plan (TOP 2025).

Part B - SDEIS Comments

8. I'm president of Charley's Taxi. We positively support transportation and public transit improvements. This is not to say, however, that we must blindly support a dubious, ill-conceived project, such as the In-Town portion of this BRT.

**Response:** Comment noted.

9. Significant, immediate, diverse, multi-mode solutions are available. By using existing available resources better, practical transportation improvements can be made. But it takes a change in attitude. It takes a change in your approach. You have to get out of this mindset of being a player, a competitor, and become a manager to manage the available resources and assets more efficiently.

**Response:** Comment noted.

10. But first, I would like to talk about the contrived scare tactics that I hear the transportation officials are using. Traffic congestion is being artificially created, purposely manipulated, to government-monopolize the roadways.

**Response:** Comment noted.

11. The BRT in-Town will doom private motorists and their passengers to worse traffic congestion permanently for the sake of the tram riders. BRT is a problem, not a solution.

**Response:** See response to comment #1.

12. Businesses are fast becoming the endangered species in Hawaii. The approach of this project's DEIS and SDEIS demonstrate government's anti-business climate in Hawaii.

**Response:** Comment noted. The issue of whether government is pro- or anti-business is beyond the scope of an EIS.

13. Why is there no consideration of the business economic impacts of BRT on small businesses, on property owners and tenants, on minority and disadvantaged businesses, on riders of private commercial vehicles, of goods and deliveries by truckers, on the convention clientele, on the tourists in general, on the businesses who sell tour attractions and activities, on everyone else who use the streets and roads? Why is the tram more important over everything and anyone else's use of the government roads?

**Response:** Business impacts of the Refined LPA are addressed in various sections of the DEIS, SDEIS and FEIS, including Sections 5.1, 5.2, 5.3 and 5.12.11. The only business displacements required are at the proposed Middle Street and West Transit Centers. As disclosed in Section 5.2, fair market compensation and relocation assistance will be provided to affected establishments. Potential impacts and mitigation for loading spaces for commercial vehicles are addressed in Section 4.4.4 of both the MISDEIS and SDEIS and Section 4.5.4 in the FEIS. There are only a few localities where loading zones will need to be relocated. Alternate loading options and turnout bays will be provided wherever loading zones are affected by BRT operations. Community-based planning will continue to be conducted during the design and construction phases, so that adverse impacts to neighborhoods and businesses are minimized.

Because there is a limited amount of road space in the PUC, priority is being given to accommodating the flow of people, not vehicles. The BRT, local buses, private buses and trolleys are being given preferential treatment in the Refined LPA, since they make more efficient use of the roadway system than do private autos.

**14. BRT will effectively close down Dillingham, perhaps to become a transit mall ultimately, just like Hotel Street.**

**Response:** There are no plans to turn Dillingham Boulevard into a transit mall. The conversion of two lanes on Dillingham Boulevard to exclusive BRT use will benefit far more people than it will negatively affect. The remaining lanes will be configured to still permit access to all of the businesses and residences on Dillingham, and there will be enough people diverted out of their cars onto transit to more than offset the reduction in capacity for autos.

**15. What's the long-term effect of this on businesses on Dillingham and the residents in the area.**

**Response:** As described in Section 5.1 of the FEIS, some redevelopment along Dillingham Boulevard is anticipated in response to the increased pedestrian activities associated with the BRT stops.

**16. So, too, what is the effect on motorists who will encounter more congestion on H-1, Nimitz, King and all the streets along and near the route alignment?**

**Response:** There will be enough people diverted out of their cars onto transit with the Refined LPA to make traffic conditions no worse and in fact somewhat better than with the No-Build or TSM Alternatives on Dillingham Boulevard, H-1, Nimitz Highway and N. King Street.

**17. But I want to close by saying that it's misleading to call a tram a bus, as in Bus Rapid Transit. A bus doesn't need to run on a track, and a bus can overtake stalled vehicles. This proposed tram is fixed, inflexible, permanently unalterable, and stops all the cars around and behind any broke down tram ahead. A tram is impractical as more efficient vehicles are available.**

**Response:** BRT vehicles regardless of the technology ultimately chosen will indeed be buses. Even the embedded plate technology since it has battery back-up will not be fixed to a track, and will be able to go around stalled vehicles.

**18. We definitely agree about the urgent need for transportation and public transit improvements. On the other hand, we cannot blindly support a radical, ill-conceived project such as the in-town portion of this proposed BRT.**

**Response:** Comment noted.

**19. WHO NEEDS BRT?**

**Response:** Comment noted.

**20. To justify this project on the pretext of "if we don't, we'll have Gridlock" is shibboleth in the first place, traffic congestion today is worse than it should be.**

**Response:** Comment noted.

**21. Road and highway improvements have long been ignored so that our road miles per vehicle, and road miles per capita are the lowest in the nation.**

**Response:** The OMO's Transportation for Oahu Plan, TOP 2025 presents the transportation projects selected for federal funding over the next 20 years. In addition, the City's Capital Improvement Program (CIP) includes numerous roadway improvements.

**22. In West and Central Oahu, not enough roads and alternative access roads have been built to keep up with the new housing developments.**

**Response:** The rapid development in West and Central Oahu has outpaced the construction of new roadways. Both the City and State governments have initiated programs to accelerate the construction of roadways. An example is the Impact Fee Ordinance now being considered by the Honolulu City Council. This ordinance would attach a transportation impact fee to each home or condominium unit constructed. The collected impact fees would help to fund new roadway construction in the area. The proposed BRT system can only help as these roadway projects will not be completed overnight and there will still be need for an alternative to private autos for transportation.

**23. Improvements to bottlenecks are ignored for one excuse or another.**

**a) Why not widen and improve H-1? The bridges don't meet federal safety standards, it will cost us more to rebuild the bridges to comply."**

**b) Why not extend the metal freeway (to Pacific Street) or double-deck Dillingham perhaps? "Out of the question, double-decking is unacceptable!"**

**Response:** The State DOT does have plans for widening H-1 in selected bottleneck locations. They also have plans for increasing the capacity of Nimitz Highway from Keolu Interchange to Pacific Street. The OMO's TOP 2025 plan includes other projects (such as the Keolu Channel and Fort Armstrong tunnels) that will increase vehicle capacity in the primary corridor.

**24. Streets have been sold or closed, or narrowed, and more are being turned into hazardous roundabouts.**

**Response:** This is a comment directed to past City actions unrelated to the EIS.

25. Waikiki's one-way street system has shrunk the available use of existing road capacity, exacerbating congestion. Suggestions to narrow side street openings in Waikiki, to wind up as semi-private courtyards, are raised from time to time.

**Response:** The one-way streets and resulting semi-private courtyards are unrelated to the EIS scope.

26. Reversible contraflow lanes like Kapolei, possibly on Dillingham as well as King streets (among others), could increase peak traffic carrying capacity.

**Response:** While reversible contra-flow lanes, whether they be for HOV or general traffic, could improve traffic flow during peak periods, it would require the elimination of left-turns during the hours of contra-flow operation. This could have a detrimental impact to the many small businesses along Dillingham Boulevard. The benefits to BRT/transit riders would be significantly less than they would be with the Refined LPA, since travel speeds would be 40-50 percent slower.

27. Unsynchronized traffic lights bunch up traffic leaving many empty blocks in-between gaps.

**Response:** The City has a state of the art traffic management center. It also has an ongoing traffic signal optimization program. Given the large number of traffic signals in Honolulu, it will take time to optimize all of the signals, but the process has been initiated and the public will see the benefits of the program in the near future.

28. Not enough "bustubs" (bus pullouts) are provided which could free up curb lanes all over town, for smoother flowing curb lane traffic, while providing bus drivers more time and space to load and unload bus passengers.

**Response:** Bus turnouts (bus bays) are proposed along sections of Dillingham Boulevard and Kuhio Avenue in the Refined LPA.

29. The state DOT's planned widening of Ala Moana at the entrance to Kalakaua was stopped at the last minute at the city's insistence. That extra laneage would have shortened traffic backed up to Alukinon or Piikoi. This was an opportunity to have the extra lane plus the pedestrian promenade, as space is available.

**Response:** The current plan for the Refined LPA includes widening of Ala Moana Boulevard between Ala Wai Canal (just Diamond Head of Alukinon Drive) and Kalia Road. For most of this segment, the curb lanes will be designated for BRT, City bus, tour bus, and right-turning vehicles. An additional three through lanes will be provided in each direction through the Kalia Road/Ala Moana Boulevard intersection. Mauka of Kalia Road, Ala Moana Boulevard will return to its existing four-lane cross-section.

30. Hundreds of tour buses and vans - enough to more than double the city's fleet - sit idle during peak traffic. These assets are available for immediate use to fill the public's demand for more buses in remote, outlying neighborhoods. People drive because there is not enough express buses. Riders wait in vain for buses that don't show up or show up late, thus unreliable for workers needing to get to work on time.

**Response:** The Leeward Oahu Transportation Management Association (LOTMA) currently provides subscription express bus service from Central Oahu using available tour buses. TheBus

formerly tried using idle tour buses to augment their bus fleet for express bus use. However, the program ended when it was found that the P.M. peak hour express bus operation clashed with the busy times for tour bus operations. The Refined LPA will significantly increase transit service from outlying neighborhoods through its Regional BRT component. The Regional BRT in conjunction with the "hub and spoke" bus route refinements will interface with the In-Town BRT system to provide expanded transit service throughout the primary transportation corridor.

31. Restrictive laws prevent the innovation of jitney and shared ride services to supplement services to neighborhoods and for the low income, unemployed, elderly and disabled. The city simply focuses on the East-West corridor, ignoring services to the Mauka-Makai neighborhoods where people actually need to go.

**Response:** The Refined LPA includes an entire system of circulator routes as well as the BRT. These circulator routes will serve mauka-makai travel needs. Some of these circulator routes may be operated as jitney or shared ride services.

32. Parking and loading areas, and discounted parking fees, are needed for private drivers to form carpools with passengers going in the same direction

**Response:** Thank you for the suggestion. Such a plan involving carpooling is beyond the scope of this project. This project aims to reduce personal vehicle use by providing a transit alternative, a public policy identified and approved by the City Council. Carpooling incentive programs, in addition to those in existence today (such as Vanpool), would have to be implemented through policy decisions.

33. Secondly, "Gridlock" is being artificially expedited, purposely confined and exploited to give the city's Tram a monopoly of the roadways. BRT will doom private motorists and their passengers to intolerable traffic congestion - permanently inconveniencing all except the riders in the tram system.

**Response:** As pointed out in Chapter 4 of the FEIS, it is not the conversion of lanes that will create congestion. The congestion for motorists will be there without the BRT. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

34. On Kalakaua Avenue, space and time allocated for delivery trucks and tour drivers in motor coaches, minibus, vans and limousines are greatly diminished today compared to two years ago. Daytime loading is barred from 9 a.m. to 10 p.m. The city's DTS directs the police (HPD) to issue parking tickets to truckers in Waikiki, causing losses in lines and time in traffic court.

**Response:** Time restrictions are needed to make the most efficient use of the limited street space that exists in Waikiki.

35. Yet, the city would condemn and bar the public's access to certain lanes on major roads in the urban Honolulu core on a massive scale - part of which is to take over a whole lane (or two) for the entire Waikiki corridor for 21 hours a day. How can there not be space enough now to accommodate the current needs of the commercial transportation drivers, and yet have more space and time for the BRT?

**Response:** The Refined LPA includes sharing of the BRT lanes in Waikiki with private buses and trolleys. Curbside freight loading on Kalakaua and Kuhio Avenues in Waikiki will be permitted just as it is today during late evening and early morning hours.

36. *The city contends it can afford to operate BRT 24 hours a day, every 3-5 minutes. How, then, is it that the city isn't giving even half or one third that kind of coverage now to the people of West, Central, Leeward and Windward Oahu, even in town?*

**Response:** The frequency of service for all bus routes, including for the In-Town BRT is shown in the FEIS for the Year 2025. There will be more frequent service for most routes by then in response to the projected population increase and increased usage of transit (mode share). The BRT headways will be particularly frequent since it will incorporate the consolidation of some existing routes along its alignment.

37. *The city proposes this BRT system to start and concentrate on the Waikiki end. But, if the intent is to serve resident taxpayers (and not tourists), why not focus on where the need is greatest, in West, Central and Leeward Oahu, where the public needs more bus seats now?*

**Response:** Waikiki is not only a tourist destination it is the employment site for 41,000 workers and houses 19,700 residents. The In-Town BRT will proceed ahead of the Regional BRT so that SDOJ widening of H-1 can be accomplished before the H-1 BRT improvements are installed.

38. *The BRT is predicted to boost ridership, even though riders on regular bus routes will sit in the same worsened traffic as the rest of us. How can the city count on increasing patronage by having dissatisfied customers? What is the impact also on TheHandi-Van services, services for the people who need to go for medical treatments and in emergencies?*

**Response:** Ridership will increase because riders will have a choice for many trips of using the faster BRT with limited stops are using the regular bus with more frequent stops. These options don't exist today.

Local bus and TheHandi-Van users will benefit along with all roadway users from the lessened delays forecast with the Refined LPA compared to the No-Build traffic conditions.

39. *Is it misleading to call a "tram" a "bus" as in BRT ("Bus Rapid Transit")? A bus doesn't need to run on a track, and a bus can overtake stalled vehicles. This proposed Tramway is fixed, inflexible, permanently unalterable (until you pull up the tracks), and stops all the cars behind any broke down tram ahead. The tram is impractical, as more efficient vehicles are available. Claims about time savings by tripping the traffic signals are overstated as pedestrians take time to cross the streets. Even now, the walk signals turn off after only 2-3 seconds, making streets pedestrian unfriendly.*

**Response:** BRT vehicles regardless of the technology ultimately chosen will indeed be buses. Even the embedded plate technology since it has battery back-up will not be fixed to a track, and will be able to go around stalled vehicles.

The signal priority that will be given to BRT buses at selected intersections will only allow the vehicles to extend the green time for a few seconds if the bus is so close to the intersection that it can take advantage of the added green time. Time will not be taken away from pedestrians by the extended green light for BRT buses.

40. *Re breakdown! A frequent sight to see in San Francisco is riders pouring out of numerous electric trolleys stopped behind a broken down trolley ahead. Re exclusive, dedicated lanes: When the Tram broke down in Denver's shopping district, we couldn't get a taxi as all other vehicles are banned from the street.*

**Response:** Comment noted. Sharing experiences in other cities.

#### 41. CAN TAXPAYERS AFFORD IT?

**Response:** This project has been developed following City Council policy to not increase taxes. The financial analysis (Chapter 6 of the FEIS) shows that no increases in existing taxes or new taxes will be required to fund the project as proposed.

42. *The capital cost is the cheapest part of the equation. The biggest burden for property tax payers is the cost to operate and maintain this tram system, adding significantly to the city's bloated budget. We question the city's claim that public subsidy of the city's transit system will not necessitate further tax increases.*

**Response:** The added O&M cost for the Refined LPA compared to the No-Build Alternative is in proportion to the increase in population growth forecast, such that no increase in per capita taxes are needed to pay for the added service.

43. *Budget constraints will predictably endanger the integrity of the existing bus system:*

- i) to cut back on schedules (shorter hours, longer waits and delays for customers)
- ii) cut down on routes (less places served)
- iii) job layoffs and/or
- iv) no pay increases for TheBus and Handi-van employees.

**Response:** The financing plan in Chapter 6 of the FEIS shows that service will not have to be cut back. See response to comment #42.

44. *Businesses are fast becoming the Endangered Species in Hawaii! The approach of this project's DEIS and SDEIS further demonstrate government's anti-business climate in Hawaii. There is no consideration of the potential jobs to be lost, or of the customers inconvenienced, the services to be degraded, and the private sector to be displaced. Transportation is not about one mode (tram or bus). The public roads and highways are built to promote mobility for diverse purposes and uses, whereas the BRT in-town is intended to provide public transit with a monopoly of the major roads in the urban core.*

**Response:** Because there is a limited amount of road space in the PUC, priority is being given to accommodating the flow of people, not vehicles. The BRT, local buses, private buses and trolleys are being given preferential treatment in the Refined LPA, since they make more efficient use of the roadway system than do private autos.

45. *Why is there no consideration of the Business Economic Impact of BRT on businesses:*

- on property owners and tenants
- on minority and disadvantaged businesses
- on stores and restaurants,
- on patients, doctors and medical services

- on schools and special education services
- on riders of private commercial vehicles, or goods and deliveries by trucks
- on the convention clientele, on tourists in general, on the businesses who sell tour attractions and activities
- on everyone else who uses the streets and roads?

**Response:** See responses to comments #5, #13, #15, and #35.

46. Displacement of private commercial operators. Why is city allowed to ignore the impacts upon other users?

— some customers who are injured or sick and going to the doctor and have to pay more waiting time because the city takes away traffic lanes and congests up the streets?

**Response:** Impacts to motorists, including taxis, have not been ignored. Overall, congestion will be less for everyone with the Refined LPA.

47. — slow-moving elderly and handicapped customers?

**Response:** All facilities constructed and vehicles used as part of the project will be compliant with the Americans with Disabilities Act.

48. — taxi drivers having to unload infant strollers and grocery bags?

**Response:** The Refined LPA will not affect taxi drivers unloading infant strollers and grocery bags.

49. — truckers making deliveries having to truck 2 blocks going and coming to their customers?

**Response:** Except in a few instances loading zones for commercial vehicles making deliveries will be unaffected by the Refined LPA. As discussed in Section 4.4 of the FEIS, these few loading zone losses in Waikiki will be mitigated by establishing loading zones in close proximity and/or by creating turnout bays to allow passenger and freight loading during designated hours.

50. — melting ice cream belonging to the grocery store customer stuck in traffic due to bumper to bumper traffic?

**Response:** Comment noted.

51. — Taxi riders having to pay more as the meter keeps on ticking in traffic congestion.

**Response:** Congestion will be less with the Refined LPA compared to the No-Build and TSM Alternatives.

52. — Degradation of services to taxi customers as it will take longer for the driver to arrive at the destination due to traffic congestion?

**Response:** Congestion will be less with the Refined LPA compared to the No-Build and TSM Alternatives.

53. — Taxi drivers having to work long hours to make the same number of trips as now, because they will be sitting in traffic?

**Response:** Congestion will be less with the Refined LPA compared to the No-Build and TSM Alternatives.

54. — why should our customers be inconvenienced and pay more, over the interests of bus riders?

**Response:** Impacts to motorists, including taxis, have not been ignored. Overall, congestion will be less with the Refined LPA compared to the No-Build and TSM Alternatives.

55. — why is the city going to make it so inconvenient and expensive to ride our non-government subsidized taxis?

**Response:** Impacts to motorists, including taxis, have not been ignored. Overall, congestion will be less with the Refined LPA compared to the No-Build and TSM Alternatives.

56. — why are the interests of tram riders having priority over our taxi customers?

**Response:** Impacts to motorists, including taxis, have not been ignored. Overall, congestion will be less with the Refined LPA compared to the No-Build and TSM Alternatives.

57. — the cumulative effect of traffic congestion, here, there and everywhere, at or near where the BRT system runs are definitely going to degrade our services unacceptably. The taxi business is time-sensitive, in other words, most customer call at the last minute, just before they need a ride. Our taxis go where and when most of the city buses don't go. But our drivers will be stuck in intolerable traffic congestion, a half-hour longer on Kapikani, 20 minutes longer on Nimz, 20 minutes more wherever the Train goes near. So, our drivers will have to work more hours as the number of trips per hour falls, plus more street (individual), and wear and tear (cars). BRT doesn't even have to take our customers, the drivers will quit anyway in frustration!

**Response:** Congestion will be less overall with the Refined LPA compared to the No-Build and TSM Alternatives.

58. — why is the government pouring government funds to displace private sector transportation companies, by degrading our ability to service our customers at existing levels, so as to shift our customers into this BRT? Is it fair or legal for the monopoly government bus service to drive private small businesses out of business? Giving preference to the BRT over taxi riders is unfair competition, especially since taxi riders' fares are non-subsidized.

**Response:** The BRT is not designed to compete for patrons of private transportation services, such as taxis. For example, the BRT does not provide door-to-door service that taxis provide.

59. — Is the city violating the federal transportation department's policy to have Private Sector Participation in the formulation of an improved transit system, when in fact we have been ostracized and excluded as much as possible in the work planning details? Other transportation operators here told me that they were told not to attend BRT meetings, not to express objections to the BRT at OHP-O policy meetings, and also that the Waikiki Working Group was "by invitation only". As a major taxi company in Honolulu, our company has been specifically ostracized by the city and its consultants, except in these very superficial public meetings. We are specifically

excluded from working groups. I also attended a Waikiki Livable Community meeting, where we were told that BRT is a "given", not up for discussion. I wrote comments and never got even a thank you response.

**Response:** The City is not violating any federal regulations regarding private sector participation in formulating an improved transit system. There have been numerous forums for private sector transportation providers to provide input into the process. Besides the open houses, workshops, public hearings, City Council meetings open to everyone, there were three meetings of the Hawaii Transportation Association, where project representatives gave presentations on the project and invited feedback. The HTA membership includes private sector freight and passenger carriers. With regard to the working groups, their membership was limited to 30 to 40 invitees specifically so that there could be dialog among members and the project team in workshop type sessions. Members who were invited to attend the meetings were told that one of their responsibilities was to keep their sponsoring organization informed about the discussions at the meetings and to bring pack comments and suggestions from other members of their organization who were not working group members. We don't know what specific comments are referred to where no response was given.

60. -- why should the 92% of Oahu residents who don't ride the system pay for the addition of nice new trains for tourists?

**Response:** The proposed improvements in the Refined LPA are for the benefit of residents. Less than 15 percent of the riders are expected to be non-residents.

61. -- How much longer will it take for guests to wait for their pick-ups or for their cars at Moana and Surfside, if it already takes 30-45 minutes now?

**Response:** The Refined LPA will not affect pick-up of valet parked cars at the Moana-Surfside Hotel.

62. What is the impact of the BRT in Waikiki upon these and other hotels and restaurants and stores?

**Response:** As described in Chapters 4 and 5 of the FEIS, the Refined LPA will not have significant impacts on hotels, restaurants or stores in Waikiki.

63. Significant, Diverse, Immediate Solutions are available. Many other more worthy projects are being subordinated or ignored, due to the significant expense of the BRT project. We need more streets and alternative access roads to keep up with the increased development of houses in West Oahu.

**Response:** Comment noted. We do not know what "more worthy projects" are being referenced.

64. Supplement the city-owned fleet with available tour buses and vans, to double carrying capacity. Honolulu is unique to have one of our nation's biggest supply of buses per capita, except for NYC and Washington DC. This available asset (of tour buses) is being wasted, sitting idle during morning peak hours (before morning tours).

**Response:** DTS is considering contracting with private carriers to supply some of the collector services that will be part of the hub-and-spoke bus network. However, commuters need both a

ride in the morning and on the return trip home. Tour buses are typically not available for the return trip. Past attempts to contract with private tour operators for commuter services were not successful due to the unavailability of buses to serve the afternoon peak.

65. Use reversible HOV contraflow lanes for use by all HOVs, not only the transit buses.

**Response:** There will be reversible contra-flow lanes for buses on the H-1 Freeway. These zipper lane improvements will be available to HOVs as well as buses.

66. The estimated 30% of uninsured motorists should be taken off the streets. The city's licensing division knows who they are, but nothing is being done, so we all have to pay premiums for uninsured motorists insurance due to the bureaucratic failures.

**Response:** Comment noted. Uninsured motorists are beyond the scope of this project.

67. Use incentives to encourage private carpools, by discounted parking, priority use of parking places to pick up other riders in car pools. (Private carpools save taxpayers the inefficient expense of hiring more bus drivers and mechanics and buying and garaging more buses.)

**Response:** There currently exist incentives for individuals to participate in rideshare programs:

The statewide vanpool program offers vans for eligible commuters and provides tax advantages to employees and employers, who use those benefits related to their commuting fees and parking expenses. Similar tax benefits exist for those who purchase bus passes through their employers and participate in this federal program (TEA-21).

There also exists a rideshare program throughout Oahu conducted by the State Department of Transportation to match riders in carpools and this program is supported by the Leeward Oahu Transportation Management Association (LOTMA) to specifically reduce the number of vehicles traveling between Leeward and Central Oahu and Honolulu.

LOTMA also provides a Commuter Express Service (on private motor coaches for a monthly fee) to individuals from Central Oahu.

The value of both the vanpool and carpool programs that exist today include the reduction in traffic congestion and the savings by those that are not operating their own vehicles, who share expenses for fuel and parking. There is also the convenience factor of door-to-door service.

Other private carpools could mimic or duplicate the success of these programs. They would help to further reduce the number of cars on Oahu's roadways.

Buses carry many more riders in fewer vehicles than cars can handle by comparison and as mentioned earlier, some riders can save as they take tax advantage on their bus passes, if they qualify under TEA-21.

68. Clear off accidents faster to re-open roads and highways. Set a maximum so that the roads are closed for hours at a time creating security problems and inconvenience and loss for everyone stuck in the traffic.

**Response:** Both City and State agencies are reviewing current procedures in order to make more effective use of intelligent transportation systems (ITS) to improve traffic incident response. Some



E Noa Corporation  
1441 Waimanu Street  
Honolulu, Hawaii 96814

Testimony of Tom Dinell  
on behalf of the  
E Noa Corporation

City Council Transportation Committee  
before the

MIS/Draft EIS Primary Corridor Transportation Project  
October 5, 2000

My Name is Tom Dinell. I am speaking today on behalf of the E Noa Corporation and its President, Katsumi Tanaka.

We believe that the residents of Oahu deserve a well-planned, well-conceived, efficiently operated public transit system. Generally speaking, we think that the recommended Bus Rapid Transit Alternative is the way to go. We have, however, a number of questions, which require attention. In our view, they are not addressed or adequately considered in the MIS/Draft EIS.

- Does it make sense to move buses to Kalakaua Avenue and eventually have an exclusive lane on that Avenue? Has the possibility of restricting Kuhio Avenue to transit vehicles and commercial vehicles, including tour buses and trolleys, been considered? Would not such an approach allow the widening of the present abysmally narrow sidewalks on Kuhio, contribute to a pedestrian orientation for Waikiki, result in an attractively landscaped Kuhio Avenue and reduce the use of Waikiki as a throughway for motor vehicles?
- How would shared use of an exclusive lane work? Can it work? If the time between the planned tram vehicles in Waikiki is four minutes, will it be feasible for tour buses and trolleys to share that lane, especially if these vehicles are engaging in loading and unloading passengers? If it

Ms. Dale Evans  
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ITS components that would apply are traffic cameras and variable message signs to detect and inform motorists of accidents. The City is reviewing techniques that have the potential of allowing faster documentation of accident sites.

69. Put in more Busbays so that the buses can pull out of the curb lane to load and unload bus riders. This would immediately add carrying capacity to existing streets.

Response: Bus turnouts (bus bays) will be added along sections of Dillingham Boulevard and Kuhio Avenue.

70. The proposed BRT in-town is unacceptable and impractical and offers no solutions to our island traffic and transportation needs. However, it will take a change in public policy to change the practice of furthering the monopoly transit operator, to instead use and manage the island's available assets and resources more efficiently, to have meaningful transportation improvements - for the general public interest.

Response: Comment noted.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Myamoto at 527-6376. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

E Noa Corporation  
1441 Waimanu Street  
Honolulu, Hawaii 96814

Testimony of Tom Dinell  
on behalf of the  
E Noa Corporation  
before the  
City Council Transportation Committee  
MIS/Draft EIS Primary Corridor Transportation Project  
October 5, 2000

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- How would shared use of an exclusive lane work? Can it work? If the time between the planned tram vehicles in Waikiki is four minutes, will it be feasible for tour buses and trolleys to share that lane, especially if these vehicles are engaging in loading and unloading passengers? If it

is impractical for tour buses and trolleys to use the exclusive curb lane, where will they go to load and unload passengers? Would it not be inviting serious accidents to board and let passengers off in a non-curb lane? Has the City and County Administration engaged in sufficient consultation with private operators concerning the use of a shared lane?

- What consideration has been given to the impact of the proposed BRT Alternative on the economic viability of private transportation companies operating in Waikiki? What consideration has been given in the MIS/Draft EIS to the appropriate division of labor between the public transit system and private sector transportation providers? If some of the private companies were to be driven out of business as a consequence of implementing the BRT Alternative, what would be the impact on City and County and State tax revenues? Is not a potential loss of public revenues a matter that should be considered in the MIS/Draft EIS or in another actionable document prior to adoption of the MIS/Draft EIS?

- What consideration has been given to the equitable division of operating costs between the riders and the taxpayers? Is there some ratio that makes sense? If local taxpayers are underwriting a substantial share of the operating costs, does it make any difference if the rider is a local resident, a mainland visitor, or a foreign visitor? Does the City and County have data showing the numbers of riders in each category at present and as projected under the BRT Alternative? Is not the equity issue a fundamental matter that should be addressed in the MIS/Draft EIS or in another actionable document prior to adoption of the MIS/Draft EIS?

- Is there not a serious problem inherent in approving an MIS/Draft EIS and committing ourselves to a major transportation alternative without first resolving some of the basic public policy issues not explicitly addressed in that document?

Thank you very much for the opportunity to share with you some of the questions that we believe need to be resolved prior to committing to the Bus Rapid Transit Alternative.

E Noa Corporation  
1441 Waimanu Street  
Honolulu, Hawaii 96814

Testimony of Tom Dinell  
on behalf of the  
E Noa Corporation  
before the  
Department of Transportation Services  
MIS/Draft EIS Primary Corridor Transportation Project  
October 12, 2000

My Name is Tom Dinell. I am speaking today on behalf of the E Noa Corporation and its President, Katsumi Tanaka.

We believe that the residents of Oahu deserve a well-planned, well-conceived, efficiently operated public transit system. Generally speaking, we think that the recommended Bus Rapid Transit Alternative is the way to go. We have, however, a number of questions, which require attention and which are not addressed or adequately considered in the MIS/Draft EIS. In fact, the major problem with the MIS/Draft EIS is not in what it says, but in what it does not say.

- Does it make sense to move buses to Kalakaua Avenue and eventually have an exclusive lane on that Avenue? If the possibility of restricting Kuhio Avenue to transit vehicles and commercial vehicles, including tour buses, trolleys and taxis, has been considered and discarded, that fact is neither stated nor documented in the MIS/Draft EIS. Would not a restricted access to Kuhio allow the widening of the present abysmally narrow sidewalks on along that Avenue, contribute to a pedestrian orientation for Waikiki, result in an attractively landscaped Kuhio Avenue and reduce the use of Waikiki as a throughway for motor vehicles? I could not find any place in the MIS/Draft EIS where such questions are discussed.

- The MIS/Draft EIS does not describe how shared use of an exclusive lane in Waikiki would work? Can it work? If the time between the planned tram vehicles is four minutes, will it be feasible for tour buses and trolleys to share that lane, especially if these vehicles are engaging in loading and unloading passengers? If it is impractical for tour buses and trolleys to use the exclusive curb lane, where will they go to load and unload passengers? Would it not be inviting serious accidents to board and let passengers off in a non-curb lane? Has the City and County Administration engaged in sufficient consultation with private operators concerning the use of a shared lane? I could not find any place in the MIS/Draft EIS where such questions are discussed.

- Does the MIS/Draft EIS consider what the impact of the proposed BRT Alternative will be on the economic viability of private transportation companies operating in Waikiki? Does that document consider the appropriate division of labor between the public transit system and private sector transportation providers? If some of the private companies were to be driven out of business as a consequence of implementing the BRT Alternative, what would be the impact on City and County and State tax revenues? Is not a potential loss of public revenues a matter that should be considered in the MIS/Draft EIS or in another actionable document prior to adoption of the MIS/Draft EIS? I could not find any place in the MIS/Draft EIS where such questions are discussed.

- What consideration has been given in the MIS/Draft EIS to the equitable division of operating costs between the riders and the taxpayers? Is there some ratio that makes sense? If local taxpayers are underwriting a substantial share of the operating costs, does it make any difference if the rider is a local resident, a mainland visitor, or a foreign visitor? Does the City and County have data showing the numbers of riders in each category at present and as projected under the BRT Alternative? Is not the equity issue a fundamental matter that should be addressed in the MIS/Draft EIS or in another actionable document prior to adoption of the MIS/Draft EIS? I could not find any place in the MIS/Draft EIS where such questions are discussed.

- What are the opportunity costs of using general obligation bonds to fund a portion of the cost of building the BRT system? What projects

will have to be forgone if we use GO bonds to fund capital BRT costs while maintaining the current level of GO bond funding of the capital budget? I could not find any place in the MIS/Draft EIS where such questions are discussed.

- Is there not a serious problem inherent in approving an MIS/Draft EIS and committing ourselves to a major transportation alternative without first resolving some of the basic public policy issues not explicitly addressed in that document?

Thank you very much for the opportunity to share with you some of the questions that we believe need to be resolved prior to committing to the Bus Rapid Transit Alternative.

E Noa Corporation  
1441 Waimanu Street  
Honolulu, Hawaii 96814

Testimony of Tom Dinell  
on behalf of the  
E Noa Corporation  
before the  
City Council Transportation Committee  
re  
MIS/Draft EIS Primary Corridor Transportation Project  
October 26, 2000

My Name is Tom Dinell. I am speaking today on behalf of the E Noa Corporation and its President, Katsuami Tanaka.

We believe that the residents of Oahu deserve a well-planned, well-conceived, efficiently operated public transit system. Generally speaking, we think that the recommended Bus Rapid Transit Alternative is the way to go. We have, however, a number of questions, which require attention and which are not addressed or adequately considered in the MIS/Draft EIS

This evening, however, I wish to focus solely on the proposed tram alignment in Waikiki and recommend an alternative to the use of Kalakaua Avenue. Establishing an exclusive lane on Kalakaua, even if tour buses and trolleys are permitted to use that lane, will give rise to multiple problems.

Creating a beautiful, well-landscaped Pedestrian-Transport Mall on Kuhio Avenue allows us to use one project to move multiple Waikiki initiatives forward simultaneously:

- revitalize Kuhio, which currently is a blot on Waikiki,
- contribute to a pedestrian-friendly Waikiki,
- reduce through vehicular traffic in Waikiki, and
- assure the rapid movement of the Tram, City buses and tour buses and trolleys in Waikiki.

The Mall would work this way:

- Widen both the mauka and makai sidewalks by approximately six feet each (except in the two or three blocks where Kuhio is only four lanes wide), using the Local Motion and Nike Town sidewalks as models where appropriate.
- Restrict vehicular traffic on the Kuhio Pedestrian-Transport Mall to the City Tram and buses, tour buses and trolleys, taxis and other commercial vehicles.
- Allow passenger vehicles on the Mall for only one or two block lengths for gaining necessary access to or egress from hotel and residential parking areas and hotel port cocheres.
- Use the mauka and makai lanes for loading and unloading passengers from the Tram, tour buses and trolleys and taxis and cargo from commercial vehicles.
- Use the mauka center lane for movement of allowed vehicles in the Ewa Diamond Head direction.
- Create a tram turnaround at the Diamond Head end of Kuhio by acquiring the vacant lot on the makai side and/or a small portion of Jefferson School on the mauka side.
- Make the Pedestrian-Transport Mall a place of joy and beauty by creating attractive sidewalks, exquisite landscaping, handsome street furniture and good looking street lighting and inviting private businesses to make their establishments equally attractive.

The Primary Corridor Transportation Project is going to absorb a large portion of the City's capital budget capacity for at least ten years. If we do not use this Project to revive Kuhio Avenue now, it is unlikely that City capital improvement funds will be available for such a purpose anytime in the near future.

We have an opportunity to move multiple Waikiki initiatives forward by means of a single project. Let's not let that opportunity slip away.

We recommend that when the Council selects the preferred alternative that they include a proviso requiring consideration of the creation of a Kuhio Pedestrian-Transport Mall as an alternative to the proposed Kalakaua/ Kuhio alignment.

We have other questions about the MIS/Draft EIS, but we will save them for another day. Thank you very much for the opportunity to share with you our thoughts and hopes for a Kuhio Pedestrian-Transport Mall.

# E NOA CORPORATION

Operators of E Noa Tours & Waikiki Trolley Tours "The Tour & Trolley People"

November 6, 2000

Ms. Cheryl D. Soon  
Director  
City and County of Honolulu  
Department of Transportation Services  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813

Re: E Noa Corporation Comments on MIS/Draft EIS

Dear Ms. Soon:

This response to the Primary Corridor Transportation Project MIS/Draft EIS from the E Noa Corporation is presented primarily in the forms of questions. Generally speaking, we think that the recommended Bus Rapid Transit Alternative is the way to go. We have, however, many questions, which require attention and which are not addressed or adequately considered in the MIS/Draft EIS. We hope you find our questions useful to you as you prepare the final EIS.

1. The Nature of the Visitor Industry. The crucial element for the private transportation companies serving the visitor industry is service. Central to service is the convenience of the customer who is visiting Hawaii. Convenience to the customer using private transportation services means: (a) being picked-up and dropped-off at his or her hotel, (b) multiple stops for his or her convenience, (c) having the vehicle wait even if he or she is a bit late for the transportation that has already been paid for, (d) not being mystified and confused by being told to wait for a tour bus or trolley at a location with hard-to-pronounce street names, and (e) being able to choose to travel by tour bus or trolley or taxi or limousine or rental car. Furthermore, the Hawaii visitor industry is highly dependent on packages offered by travel wholesalers who may easily promote packages to other destination areas if they find that private passenger carriers in Hawaii are not serving their customers well. A reputation for inadequate service is likely to lead to fewer visitors, which would have serious consequences for the visitor industry and in turn all of Hawaii including government. Has the MIS/Draft EIS taken into consideration the convenience of the visitors who are served by the private transportation carriers?

2. The Shared Lane on Kalakaua. Does it make sense to move City buses to Kalakaua Avenue? Why is it being suggested that they be moved? Will the concept of having the BRT trams share the lane with private tour buses and trolleys work? Will private tour buses and trolleys be allowed to stop to load and unload passengers in the shared lane? Would not such loading and unloading operations tend to interfere with the timely movement of the frequent BRT trams? If such a situation arises, is it not likely that

E Noa Corporation Comments on MIS/Draft EIS November 6, 2000 2

curbside loading and unloading of private tour buses and trolleys along the makai lane of Kalakaua would be banned? If it is impractical for private tour buses and trolleys to share the exclusive curb lane, then where would the private tour buses and trolleys go? Would it not be inviting serious accidents to board and let passengers off in the mauka lane or a non-curb lane?

3. A Pedestrian-Transit Mall on Kuhio Avenue. Has the possibility of creating a Pedestrian-Transit Mall along Kuhio Avenue, restricted to City buses and trams and commercial vehicles, including tour buses, trolleys, taxis and limousines, and allowing limited private vehicle access to garages and hotel porte cocheres, been considered? Would not restricted access to Kuhio allow for the widening of the present abysmally narrow sidewalks along that Avenue, contribute to a pedestrian orientation for Waikiki, result in an attractively landscaped Kuhio Avenue, reduce the use of Waikiki as a throughway for motor vehicles and facilitate accomplishing two major capital-intensive endeavors with a single project? (See attachment describing how a Kuhio Avenue Pedestrian-Transit Mall might work.) Has another alternative, namely, moving the BRT tram Diamond Head on Kuhio and Ewa on Ala Wai Boulevard been examined?

4. Economic Viability of Private Transportation Companies. What is the impact of the proposed BRT Alternative on the economic viability of private transportation companies operating in Waikiki? What is the appropriate division of labor between the public transit system and private sector transportation providers? If some of the private companies were to be driven out of business as a consequence of implementing the BRT Alternative, what would be the impact on City and County and State tax revenues? Does not Federal law require that in the planning of new transportation programs, to be financed from federal funds, consideration be given to preserving and utilizing existing transportation facilities, both public and private? Furthermore, does not federal law require that in planning such new systems overall social, economic, energy and environmental impacts be considered (underlining added)?

5. Equitable Division of Operating Costs. What consideration has been given to determining an equitable division of operating costs between riders and taxpayers? Is there some ratio that makes sense? Is the current 1:3 ratio the proper ratio? Is not the ratio closer to 1:1 for most mainland municipal transportation systems? If local taxpayers are underwriting a substantial share of the operating costs, does it make any difference if the rider is a local resident, a mainland visitor, or a foreign visitor? Does the City and County have data showing the numbers of riders in each category at present and as projected under the BRT Alternative? Is not the equity issue a fundamental matter that should be addressed at this time?


6. Opportunity Cost of Using General Obligation Bonds. What are the opportunity costs of using general obligation bonds to fund a portion of the cost of building the BRT system? What portion of the general obligation capacity of the City will be devoted to funding the BRT alternative, assuming the current level of GO bond funding of the capital budget is maintained? What projects will have to be forgone if the City uses GO bonds to fund

capital BRT costs? Is it not possible to review the CIP appropriation bills for the past three years and prepare a fairly accurate list of the projects that will not be undertaken during the construction of the BRT, given the commitment to level CIP funding and current bond limits? Is making such a list public an essential part of an open evaluation process that allows citizens to make informed judgments?

7. Competing With Privately-Owned Transportation Companies. Is the City involved in a basic conflict of interest? Can it be both a regulator, creating a level playing field for all private operators, and an entrepreneur, operating a highly subsidized public transit system, without getting these two roles confused? Will not the City's desire to promote the well-being of its own enterprise take precedence over other choices in a manner that will be detrimental to privately owned, tax-paying transportation businesses? Are there not already examples of the City using its privileged position as policy-maker and entrepreneur to compete unfairly with privately owned transportation companies such as: (a) the low-cost four-day pass, marketed to short-term visitors; (b) the publication and distribution of TheBus schedule in Japanese editions distributed in Japan for which OTS receives a royalty; (c) The City monopolizing pick-up and delivery service to specific visitor destinations, e.g., Hanauma Bay; and (d) the City subsidization of the travel of visitors on its buses, with taxpayers paying approximately \$3 for every \$1 of revenue received by the City (and ignoring the subsidy in terms of capital costs)?

8. Statistical Precision. How precise are the estimates of costs, revenues and ridership and other projections ten and twenty year hence, which are put forth in the MISDraft EIS? Is there not a margin of potential error in such projections? If so, what is the margin of error that applies to each class of data? With what degree of accuracy can a ridership of 333,000 trips per day be projected for the BRT alternative in the year 2025? How accurate is the figure of \$1,060,300,000 capital costs over 25 years for the BRT alternative (expressed in 1998 dollars)?

The E Noa Corporation is ready to work with you and others in refining the BRT alternative as it relates to Waikiki. We hope you take our questions very seriously so that the plans you develop and implement do not make it difficult or impossible for E Noa Corporation and other privately owned, tax paying transportation companies to serve Hawaii's visitors and serve them well and with aloha. Thank you very much for considering our question. We look forward to your responses and future dialogue on these important issues.

Sincerely yours,  
  
Tom Dinell  
Consultant to E Noa Corporation

Cc: Office of Environmental Quality Control  
Attachment: A Pedestrian Traffic Mall for Kuhio Avenue: How It Might Work

### ATTACHMENT

#### A Pedestrian-Transport Mall for Kuhio Avenue: How It Might Work

Creating a beautiful, well-landscaped Pedestrian-Transport Mall on Kuhio Avenue would allow the City to use one project to move multiple Waikiki initiatives forward simultaneously:

- revitalize Kuhio Avenue, much of which is currently a blot on Waikiki,
- contribute to a pedestrian-friendly Waikiki,
- reduce through vehicular traffic in Waikiki, and
- assure the rapid movement of the Tram, City buses and tour buses and trolleys in Waikiki.

The Mall, in general terms, would work this way:

- Widen both the mauka and makai sidewalks by approximately six feet each (except in the two or three blocks where Kuhio is only four lanes wide), using the Local Motion and Nike Town sidewalks as models where appropriate.
- Restrict vehicular traffic on the Kuhio Pedestrian-Transport Mall to the City Tram and buses, tour buses and trolleys, taxis and other commercial vehicles.
- Allow passenger vehicles on the Mall for only one or two block lengths for gaining necessary access to or egress from hotel and residential parking areas and hotel port cocheres.
- Use the mauka and makai lanes for loading and unloading passengers from the Tram, tour buses and trolleys and taxis and cargo from commercial vehicles at designated locations.
- Use the mauka center lane for movement of allowed vehicles in the Ewa direction and the makai center lane for movement of allowed vehicles in the Diamond Head direction.
- Create a tram turnaround at the Diamond Head end of Kuhio by acquiring the vacant lot on the makai side and/or a small portion of Jefferson School on the mauka side.
- Make the Pedestrian-Transport Mall a place of joy and beauty by creating attractive sidewalks, exquisite landscaping, handsome street furniture and good looking street lighting and inviting private businesses to make their establishments equally attractive.



The above bullets describe in general terms how a Kuhio Avenue Pedestrian-Transit Mall might work. Clearly a systematic planning study is required to flesh out: (1) the details of how the Mall would operate, including specifying how traffic would move onto, off of and across Kuhio; and (2) estimates of the resulting vehicular traffic load on Kalaka'au Avenue and Ala Wai Boulevard.

The Primary Corridor Transportation Project will absorb a large portion of the City's capital budget capacity for at least ten years. If the City does not use this Project to revive Kuhio Avenue now, it is unlikely that City capital improvement funds will be available for such a purpose anytime in the near future.



# E NOA CORPORATION

Operators of E Noa Tours & Waikiki Trolley Tours "The Tour & Trolley People"

Testimony of Tomi Dinell  
on behalf of the  
E Noa Corporation  
before the

City Council Transportation Committee

Re:

Resolution 00-249  
Selection of a Locally Preferred Alternative for the Primary Corridor  
Transportation Project  
November 14, 2000

My Name is Tomi Dinell. I am speaking today on behalf of the E Noa Corporation and its President, Katsunori Tanaka.

We generally support the intent of Resolution 00-249 relating to the selection of a Locally Preferred Alternative for the Primary Corridor Transportation Project. We have, however, a number of questions, which require attention and which are not addressed or adequately considered in the MIS/Draft EIS. We also are offering language for a friendly amendment to the Resolution.

We have listed our questions in our November 6, 2000, to Cheryl Soon, Director of the Department of Transportation Services. That letter and an addendum thereto describing how a Pedestrian-Transit Mall on Kuhio Avenue might work are attached to this testimony. Our questions relate to:

- The Nature of the Visitor Industry;
- The Shared Lane on Kakaia Avenue;
- A Pedestrian-Transit Mall on Kuhio Avenue;
- Economic Viability of Private Transportation Companies;
- Equitable Division of Operating Costs;
- Opportunity Costs of Using General Obligation Bonds
- Competing with Privately-Owned Transportation Companies;
- Statistical Precision.

We hope you will take time to study our questions and secure responses to them before you take final action on Resolution 00-249.

Finally, we urge you to amend the first "Be It Further Resolved" clause of the Resolution by adding the following words at the end of that clause: "provided that consideration is given to realigning the transit spine in Waikiki so as to avoid using Kakaia Avenue." If such a proviso is not added to the Resolution, we urge you to incorporate such a request for reconsideration of the alignment in Waikiki in your Committee Report.

Thank you very much for the opportunity to share with you our thoughts on Resolution 00-249.

# E NOA CORPORATION

Operators of E Noa Tours & Waikiki Trolley Tours "The Tour & Trolley People"

MAY 8 2002

## Comments on the Supplemental Draft Environmental Impact Statement on the Primary Corridor Transportation Project

May 7, 2002

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3rd Floor  
Honolulu, Hawaii 96813

and

Ms. Genevieve Salmonson, Director  
Office of Environmental Quality Control  
State of Hawaii  
235 South Beretania Street, Suite 702  
Honolulu, Hawaii 96813

Dear Ms. Soon and Ms. Salmonson:

Thank you very much for providing us with this opportunity to comment on the Supplemental Draft Environmental Impact Statement (SDEIS) on the Primary Corridor Transportation Project. Let us make clear, before proceeding with our comments, that we strongly favor improved public mass transit for Oahu residents. We also believe, however, that there are serious problems in this Supplemental Draft Environmental Impact Statement that lead us to recommend the rejection of this SDEIS. Our comments follow. All citations refer to the Supplemental Draft EIS, Primary Corridor Transportation Project, March 2002, unless otherwise noted.

1. **The Absence of a Multi-Modal Transportation Plan for Honolulu.** There is no current over-all multi-modal transportation plan for Honolulu based on continued use of private vehicle automotive transportation, which supports the automobile within a policy context that provides for mitigating its environmental, resource and movement impacts, while increasing other transportation choices, such as public transit, car-pooling, van-pooling, bicycling, walking, flexible work hours and telecommuting, among other

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strategies. The Draft Supplemental EIS does refer to the public review drafts of the Primary Urban Center and Ewa Development Plans and to the Oahu Metropolitan Planning Organization's Transportation for Oahu Plan (Top 2025) and to the City's own Islandwide Mobility Concept Plan. All of these are useful documents; particularly the Islandwide Mobility Concept Plan, but none of them is a multi-modal transportation plan for Oahu. Transportation in the modern metropolitan community is not a matter of private car versus public transit, but rather how to fit all the multiple means of transportation together, as well as mitigating the need for transportation and relating land-use and transportation developments, into an integrated, multi-modal transportation plan, as the Islandwide Mobility Concept Plan recognizes.

The absence of a multi-modal transportation, within which the proposals put forth in the Supplemental Draft EIS fit, makes the SDEIS a deficient and inadequate document, which should be rejected.

2. **The Failure to Consider a Range of Alternatives Generally.** The original MIS/Draft EIS considered three alternatives, namely, no-build, TSM and BRT. (See S.2.1, pp. S-3/4). The fixed rail alternative, whether light or heavy, was not analyzed in detail in the initial MIS/Draft EIS. (See pp 2-2/4, MIS/Draft EIS Primary Corridor Transportation Project, City and County of Honolulu, Department of Transportation Services, August 2000.) The possibility of a right-of-way that might potentially provide a separate grade system for a portion of the transit route was not mentioned in the initial Draft MIS/EIS nor in the SDEIS. There is no consideration of the potential for expanding the van pool system nor increasing the use of flexible working hours now expanding the portion of the work force employing telecommuting or other alternative strategies in the SDEIS.

Perhaps none of these alternative strategies would contribute to easing Honolulu's transportation problems, though that is hard to believe. Perhaps some would turn out to have a low cost-benefit ratio and therefore should not be selected. Not having subjected alternative strategies to serious examination and detailed, objective analysis in the SDEIS makes the SDEIS a deficient and inadequate document, which should be rejected.

3. **The Failure to Consider a Range of Alternative in Waikiki.** The Draft Supplemental EIS fails to consider a range of alternatives for Waikiki. The route laid out in the SDEIS, namely, Diamond Head on Kalanika'oua, mauka on Kapahulu and ewa on Kuhio, was the single alternative specified in the original MIS/Draft MIS and is the single alternative put forth in the current supplemental EIS. Three other routes were proposed early in the Fall of 2001 in the Waikiki Working Group, the last of the working groups to be convened. Actually, this working group met first in August 2001 and then once or twice again in the fall and then was recessed by the Department of Transportation Services (DTS). The Waikiki Working group was subsequently reconvened in April 2002. (S 2.2, p. S-5 misstates this chronology.) At its first meeting in April 2002, it was announced

by DTS that this would be the next to last meeting of the Waikiki Working Group. The reasons offered by DTS for the long recess were less than totally persuasive.

At the end of this next to last meeting in April, a document was presented by the consultant that showed that none of the alternative Waikiki routes, in their view, was as good as the DTS preferred route. The consultant used a single criterion and data related to that criterion in reaching its conclusion. The single criterion was time convenience to potential passengers in Waikiki. Neither DTS nor the consultant considered any other criteria, such as impact on traffic flow or street life or on rehabilitation of run-down areas or on the uniqueness of Waikiki as an urban resort area or on the economic well-being of businesses serving Waikiki. There was one criterion, selected by DTS and the consultant, and that was it.

With respect to ending the In-Town BRT at Saratoga, the consultant did not consider the possibility of combining a Saratoga Terminus with a Waikiki Circulator, designed to reflect and enhance the unique nature of Waikiki. This analysis could have been conducted using several alternative schemas that varied the routes, the number of stops, and the charges, such as allowing free transfers. In failing to consider this alternative, the SDEIS simultaneously neglects to consider the capital and operating costs of a circulator versus the capital and operating costs of the BRT on the route that DTS had preselected. Since the alternatives were proposed in fall 2001, but data were not provided until April 2002 at the next to last meeting of the Waikiki Working Group, and well after the Draft Supplemental EIS had been issued, the likelihood that there was to be serious consideration of these alternatives was, to say the least, minimal.

Furthermore, the Supplemental Draft EIS fails to make clear the justification for spending significant amounts of money on the Waikiki leg of the In-Town BRT beyond Saratoga when the Draft EIS states that the peak hour level of service (LOS) for the Refined BRT and for automobiles beyond Saratoga will be exactly the same, assuming the sidewalks along Kuhio are widened as anticipated. (Table 4.2-7, p. 4-19.) At the Saratoga Road and Kalanika'oua intersection, transit will yield a one or two LOS advantage. (ibid.)

The consultation process in Waikiki was further flawed by DTS's refusal to release to the Working Group members and the public copies of the Mattson Report, which was presented verbally at a fall meeting of the Waikiki Working Group. Mattson and his colleagues interviewed users of TheBus in Waikiki. DTS draws on the Mattson Report to support one of the assertions it puts forth in the Supplemental Draft EIS. (See "Economic Impacts to Tour Bus Operators, pp. 5-19/20.) The Report was commissioned by DTS and paid for using taxpayers' monies and yet DTS to date has not been willing to release the Report nor to explain why it is refusing to release the Report. One can only speculate as to why DTS has sat on the Report and none of the potential reasons reflects well on DTS. It is very difficult to comprehend how refusing to release the Mattson Report contributes to an open and informed participatory review process. One could

also raise the question of whether DTS has the legal right to suppress the Matteson Report.

The failure to examine the alternative routes suggested for Waikiki in a timely, serious and thorough manner using multiple criteria, the inexplicable commitment to continue with the Waikiki leg when its offers almost no improvement in level of service vis a vis the automobile and the suppression of the Matteson Report make the SDEIS a deficient and inadequate document, which should be rejected.

4. The Economic Impact of the In-Town BRT on the Tour Bus Operators. The Supplemental Draft EIS asserts that the In-Town BRT will not adversely affect the economic well-being of the tour bus operators. (See 5.1.5, pp. 5-19/20) It reports that visitors account for approximately five percent of total daily boardings system wide and between 20% and 25% of boardings in Waikiki. The SDEIS cites OMPO, though it is not clear what OMPO Report the SDEIS is referring to, and the never-released Matteson survey as source documents. It further states that visitor trips are projected to constitute approximately 7.7% or 6,100 of the 79,300 boardings using the In-Town BRT. The section concludes that the number of visitors using the BRT will be no greater proportionately in the future than it is today. It further concludes that, "it is not expected that the tour bus operators will be adversely affected due to the relatively low number of tourists that are expected to choose BRT for their travel needs." No economic analysis is provided to substantiate these conclusions.

We maintain that the government should not drive legitimate private businesses out of business or reduce their opportunities to engage in business by offering subsidized services that compete with the services offered by those businesses. To do so not only damages private enterprise, deprives employees of work, cuts into tax revenues, but also contributes to Hawaii's reputation as an unfriendly place to do business.

With In-Town BRT service every four to six minutes along Kalaukua and Kuhio, 21 hours a day, it would simply be phenomenal if the number of visitors using the In-Town BRT did not increase. The City Administration is using taxpayers' money to compete head-on with taxpayer private businesses. Federal Transit Administration Circular C 9300.1A, Section 4, Subsection 9 (a) states in part, "Specifically, FTA is prohibited from providing federal assistance to a governmental body that provides service in competition with, or supplemental to, service currently provided by a private transportation company, unless FTA finds that the local transportation program developed in the planning process provides for participation by private transportation companies to the maximum extent feasible."

To the best of our knowledge, neither DTS nor its consultants has systematically solicited data from tour operators to determine what those in the tour business and related transportation services have concluded would be the impact of the In-

Town BRT on their businesses. Further, the Draft cites the Matteson Report in support of its assertions but, as noted above, has failed to release the Matteson study so that those impacted by the In-Town BRT in Waikiki might examine that Report.

The Supplemental Draft EIS asserts no damage to the tour operators, but assuming DTS is wrong and there is damage, what recourse would the tour operators have? Could they recover their losses from the City because the assertion in the Supplemental Draft EIS was incorrect. The answer to that question is undoubtedly "no."

There is nothing in the Supplemental Draft EIS that provides a guarantee that the City might not increase its number of stops in Waikiki to six or seven or eight. There is nothing in the Supplemental Draft EIS that provides a guarantee that tour operator will be able to continue to share the currently planned semi-exclusive lane along Kalakaua Avenue if the City decides, in its wisdom, at some future date that sharing the lane is interfering with the smooth operation of the In-Town BRT.

The City's track record demonstrates that the City Administration is not concerned with the economic well-being of the tour operators. The City Administration is currently aggressively competing with the private tour operators by seeking to provide public subsidized transit services to visitors as witness: (1) The Bus Guide for visitors in English and Japanese, with an introduction by the Mayor; (2) the monopoly of Hanauma Bay by TheBus with Route 22 serving visitors almost exclusively, even though multiple ways to protect the fragile Hanauma Bay environment exists other than by establishing a City monopoly on multi-passenger vehicle transportation to and from the Bay; and (3) and planning of the Waikiki leg of the in-town BRT without adequate consultation with the transportation carrier industry. (See Federal Transit Administration Circular C 9300.1A, Section 4, Subsection 9.)

The failure of the City to substantiate its assertion that the In-Town BRT will not damage the tour operators economically and the track record of the City in seeking to aggressively compete with private operators further demonstrate that the SDEIS is a deficient and inadequate document, which should be rejected.

5. The Financial Implications of BRT. The City is in dire financial straits. The Administration is proposing to balance the operating budget by bond restructuring (\$63 million), tapping the Sewer Fund, even though the projected sewer and wastewater capital cost are estimated to rise from \$8.4 million in 2002 to \$257.9 million in 2002, use of the H-Power Fund for underwriting the cost of residential refuse collection (\$18 million) and sale of land (\$15 million). Furthermore, the City Department of Budget and Fiscal Services projects that annual debt service payments will increase from \$10.4 million in 2002 to \$271 million in 2009 based on the assumption that interest on all new debt will be at

5% per annum. As the annual debt service increases, it will become the largest single expenditure item in the City's operating budget.

There is almost no possibility that the interest rate on new city debt will remain at 5% per year. Nationally, the basic interest rate is likely to rise from its very low current base as the national economy recovers and the Federal Reserve Bank raises its benchmark interest rates. Further, as Honolulu debt service increases as a portion of the total operating budget and Honolulu's financial position becomes increasingly fragile, there is a very high likelihood that either Honolulu's credit rating will slip, thus increasing the cost of borrowing to the City, or that the property tax rate will need to be raised so as to be able to pay for both debt service and the cost of operating police, fire and other municipal services.

The Supplemental Draft EIS provides three assurances, which appear to be based on very shaky foundations, given the City's present and future financial conditions: (1) The BRT can be funded without raising taxes (see S-4, pp. S-15/16); (2) no major capital projects will be deferred as a result of selecting the Refined BRT (see S-4, p. S-18); and (3) the State will pay the estimated \$760,000 that it is estimated that it will cost annually to operate the Zipper Lane (see 6.1.2, p. 6-5).

Given the financial situation of the City, as briefly outlined above, the likelihood that the City is not going to have to raise taxes in the near future appears slim indeed. Some portion of the increased taxes will be attributable to the BRT Project, so for the Supplemental Draft EIS to state that taxes will not have to be raised to fund the BRT rings hollow indeed.

Some capital projects will undoubtedly be deferred as a result of selecting the Refined BRT alternative since the City money expended on the BRT will not be available to be expended on other CIP projects. The cost of proposed capital projects always exceeds the funds available. If the BRT is funded out of the capital budget, then there will be projects that will have to be deferred or forgotten about.

The City in the Supplemental Draft EIS assumes that the State will pay the estimated \$760,000 that it is projected that it will cost annually to operate the Zipper Lane, thus reducing potential annual operational costs to the City by that amount. No evidence is provided in the Draft that the State has agreed to or will be willing to assume these costs. To date, the State has not indicated any willingness to fund any of the cost of the BRT. In fact, the MIS/Draft EIS, issued in August 2000, assumed that the State would participate in funding the capital costs of the BRT. (See Table 4-1, p. S-18, MIS/Draft EIS Primary Corridor Transportation Project, City and County of Honolulu, Department of Transportation Services, August 2000.) When the State indicated that it had no plans to assist in funding the BRT, the City stated it would assume the share of the cost initially allocated to the State.

The City has included detailed projections of operating costs, capital costs and ridership in the Supplemental Draft EIS. All of these projections are offered as fixed figures. How precise are the estimates of costs, revenues and ridership and other projections ten and twenty year hence, which are put forth in the SDEIS? Is there not a margin of potential error in such projections? If so, what is the margin of error that applies to each class of data? With what degree of accuracy can a ridership of 291,900 trips per day be projected for the BRT alternative in the year 2025? (See Table S.6.1, p. S-21.) How accurate is the figure of \$1,062,500,000 capital costs over 25 years for the BRT alternative (expressed in 1998 dollars)? (ibid.) How trustworthy is the estimate that operating costs will be \$180,100,000 when the system is fully operative? (ibid.) Are not cost overruns on major capital projects built by governments frequent? Are not future operating costs of public projects frequently underestimated? Do not projections of future ridership frequently turn out to be overestimates?

Why does not the SDEIS offer it long-term projections in terms of ranges, such as high, low, probable? Why is not the difficulty of making future projections discussed in the Supplemental Draft EIS and qualifications offered as to the probable accuracy of such estimates? And what happens if it turns out that the Supplemental Draft EIS has underestimated capital costs and operating costs and overestimated ridership? Who assumes responsibility for the consequences of estimates that prove to be incorrect?

The lack of discussion of the City's current financial situation in the SDEIS, the absence of evidence that that situation has been taken into account in making cost projections, the doubtful nature of the SDEIS statements relating to tax increases, other proposed capital projects and state funding, and the absence of qualification of the estimates of long-term operating and capital costs and ridership projections make the Draft EIS a deficient and inadequate document, which should be rejected.

6. Starting With The In-Town BRT? The City Administration is proposing starting construction with the In-Town BRT rather than with the Regional BRT. The Regional BRT, however, together with local buses, will serve 5.5 times as many riders as the In-Town line (see Table 4-1-4, p. 4-5), will help people who currently have the longest and most time-consuming commute and will result in a time-saving to the users of 17 minutes (Kapiolani to downtown) as opposed to three minutes on the In-Town BRT (downtown to Waikiki). (See Table 4-1-6, p. 4-7.) Amazingly, the staging of BRT construction is not discussed in the Supplemental Draft EIS even though it is a critical element of placing the BRT in operation.

Informally, two rationales for proceeding with the In-Town BRT first have circulated. First, it is maintained, as we understand it, that it is important to start with the In-Town BRT first so that when the Regional BRT is constructed, there will be a transit system in-town available to move the riders of the Regional BRT. There is already a system in place, namely TheBus, to move people coming into

town on the Regional BRT if it were to be constructed first. It is the Regional BRT that is going to serve the local resident and reduce his or her commute from Kapolei to downtown by 17 minutes. The In-Town BRT will only save that same rider three minutes going from downtown to Waikiki. (Ibid.)

The second rationale that has been mentioned is that the State is said not to be ready to move on making the necessary modifications to the freeway system that are part of the proposed Regional BRT. This matter is not discussed in the Supplemental Draft EIS. It is certainly a matter deserving public discussion and close state-county coordination. There is a real danger, if the difficulties relating to the Regional BRT are not ironed out first, that the In-Town BRT serving 79,000 people (including tourists who constitute approximately 25% of those boarding or disembarking in Waikiki) and saving three minutes of travel time will be built and the Regional BRT serving 459,000 (including those served by local buses), almost all of whom are residents and saving those residents 17 minutes of travel time, will never be built.

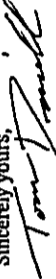
The phasing of construction and determining who will be served first and why are critical issues which should be addressed in the Supplemental Draft EIS. The fact that they are not addressed in the SDEIS makes the Draft a deficient and inadequate document, which should be rejected.

7. **The Move From Private Automobiles to Public Transit.** The Supplemental Draft EIS assumes, and rightly so, that it is important to make mass transit more comfortable and swifter if more people are to be attracted to ride public transit. It further asserts that, "The delay to motorists is expected to accelerate a switch in travel behavior from automobiles to transit." (See S.6.3, p. S-23.) This is a critical assumption, namely that by taking vehicle lanes for exclusive or semi-exclusive use by public transit vehicles, and thus increasing congestion for automobile drivers, that a significant portion of those drivers will willingly, or perhaps unwillingly, shift to public transit. The Supplemental Draft EIS cites no evidence or research data from other major American metropolitan areas which have installed exclusive or semi-exclusive lanes to support this assertion or to indicate whether such switches are made willingly or unwillingly. Is the City Administration actually proposing that we pursue a particular course of action impacting the way in which people behave without knowing what the new behavior patterns will be?

The failure of the Supplemental Draft EIS to address fully a fundamental premise underlying the proposed BRT, namely, whether or not eliminating traffic lanes for motor vehicles will result in people shifting their travel trips from private automobiles to public transit, whether willingly or unwillingly, makes the Draft a deficient and inadequate document, which should be rejected.

In conclusion, we strongly favor improved public mass transit for Oahu residents. We believe, however, that the questions we and others have raised and are raising need to be resolved, and not just swept under the table, before proceeding with implementation of the first phase of the BRT.

Sincerely yours,



Tom Dinell  
Consultant to E Noa Corporation

Cc: Leslie T. Rogers, Regional Administrator  
Region IX, Federal Transit Administration

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**

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November 13, 2002

Mr. Tom Dineff  
Consultant to E Noa Corporation  
Pier 31  
791 North Nimitz Highway  
Honolulu, Hawaii 96814

Dear Mr. Dineff:

Subject: Primary Corridor Transportation Project

This responds to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your October 5, 2000 letter, your October 10, 2000 letter, your oral testimony at the October 12, 2000 public hearing, your October 26, 2000 oral testimony at the Special Transportation Committee meeting, your October 26, 2000 letter, your November 6, 2000 letter, and your November 14, 2000 letter regarding the MIS/DEIS. Part B responds to your oral testimony at the April 20, 2002 public hearing and your May 7, 2002 letter regarding the SDEIS.

Part A - MIS/DEIS Comments

1. Generally speaking, we think that the recommended Bus Rapid Transit Alternative is the way to go.

Response: Comment noted.

2. Does it make sense to move buses to Kalakaua Avenue and eventually have an exclusive lane on that Avenue?

Response: Prior to selection of Kalakaua and Kuhio Avenues as the Locally Preferred Alternative route in Waikiki, DTS analyzed a variety of alternate routes including: (1) two-direction service on Kuhio Avenue; (2) a Kuhio Avenue-Ala Wai Boulevard BRT couplet; (3) a Kalakaua Avenue-Ala Wai Boulevard BRT couplet; and (4) turning back BRT service at or near Saratoga Road and Kalakaua Avenue. None of these alternatives provide any where as good a service to residents and employees in central Waikiki as the Refined LPA route which uses Kalakaua Avenue.

Since publication of the MIS/DEIS, the City has worked with the Waikiki Working Group and other interested parties in the Kalakaua and Kuhio Avenue corridors to redesign the BRT in Waikiki to minimize impacts on vehicular traffic on both streets and to maximize opportunities for widening sidewalks on Kuhio Avenue. Changes include allowing four buses and right turning vehicles to share the BRT lane on Kalakaua Avenue, and providing for a minimum of a combined eight feet of sidewalk widening on one or both sides of Kuhio Avenue. As shown in FEIS Table 4.2-7, the impacts of the BRT on traffic operations in Waikiki will not be significant.

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3. Has the possibility of restricting Kuhio Avenue to transit vehicles and commercial vehicles, including four buses and trolleys, been considered?

Response: Because Kalakaua Avenue and Ala Wai Boulevard are one way streets, Kuhio Avenue is critical in providing local access to businesses and residences. Kuhio Avenue also serves as a way of going around the block to access properties on the one-way cross streets. Keeping at least one lane of traffic in each direction on Kuhio Avenue for general purpose traffic has been a goal in planning for the BRT in Waikiki.

4. Would not such an approach allow the widening of the present abysmally narrow sidewalks on Kuhio, contribute to a pedestrian orientation for Waikiki, result in an attractively landscaped Kuhio Avenue and reduce the use of Waikiki as a throughway for motor vehicles?

Response: An alternative approach to enable sidewalk widening while accommodating the BRT, private buses, freight loading, and automobiles has been developed and is part of the Refined LPA. (See Preliminary Engineering drawings in Appendix B).

5. How would shared use of an exclusive lane work? Can it work? If the time between the planned train vehicles in Waikiki is four minutes, will it be feasible for four buses and trolleys to share that lane, especially if these vehicles are engaging in loading and unloading passengers?

Response: Existing or future pullouts along these streets will allow four buses and trolleys to load/unload without interfering with BRT operation since the BRT will use separate stops. In the event that a trolley or four bus blocks the BRT curb lane, the BRT vehicle can simply go around the stopped vehicle in the adjacent lane.

6. If it is impractical for four buses and trolleys to use the exclusive curb lane, where will they go to load and unload passengers? Would it not be inviting serious accidents to board and let passengers off in a non-curb lane? Has the City and County Administration engaged in sufficient consultation with private operators concerning the use of a shared lane?

Response: Through community outreach efforts including working with members of the Hawaii Transportation Association which represents private freight and passenger carriers, the sub area Working Groups, the Waikiki Improvement Association, and others, DTS has developed a plan which relocates the BRT to curb lanes in Waikiki that will be shared with private buses and trolleys. The revised plan minimizes direct impacts on passenger and freight loading zones, and in the event of unavoidable adverse impacts, identifies alternate loading locations for all businesses along the BRT route. There will not be any measurable impact to businesses due to the loss of any loading zones.

7. What consideration has been given to the impact of the proposed BRT Alternative on the economic viability of private transportation companies operating in Waikiki?

Response: FEIS Section 5.1.5 describes the potential impacts on private transportation providers in Waikiki.

The travel market served by private operators such as taxis, shuttles, etc., is distinctly different from that served by the Refined LPA. The travel market served by private operators would still need these services even with implementation of the Refined LPA. Existing private transit services are oriented to the visitor market and either take people door-to-door, take them on tours with

narration, or transport them in a vehicle designed to appeal to this market. The BRT system is designed to serve trips by residents and workers not tourists and offers none of the above features. Just as today some visitors may find it advantageous to take the local bus system and/or BRT for certain of their trips. The tourists expected to use the public transit system with the BRT is forecast to be no greater proportionally than today (i.e., less than 10-15 percent of the total daily boardings).

Additionally, implementation of the PCTP, including reconfiguration to a hub-and-spoke bus system, would provide many opportunities for privatization. The concept of the hub-and-spoke bus system is circular buses collecting riders from certain routes "spokes" and dropping them off at various "hubs" in the community located along the main transit spine. There may be opportunities for circulator routes to be operated by privately owned transportation providers.

There would also be opportunities at transit stops for private development to provide various types of retail establishments to serve transit users and the general public.

8. What consideration has been given in the MIS/Draft EIS to the appropriate division of labor between the public transit system and private sector transportation providers?

Response: See response to comment #7.

9. If some of the private companies were to be driven out of business as a consequence of implementing the BRT Alternative, what would be the impact on City and County and State tax revenues? Is not a potential loss of public revenues a matter that should be considered in the MIS/Draft EIS or in another actionable document prior to adoption of the MIS/Draft EIS?

Response: FEIS Section 5.1.5 describes potential impacts on private transportation providers in Waikiki. No impacts to private companies are forecast, therefore no loss in City and County tax revenues are expected.

10. What consideration has been given to the equitable division of operating costs between the riders and the taxpayers? Is there some ratio that makes sense?

Response: The establishment of transit operating budgets and the setting of fares is a prerogative of the City Council. The FEIS assumes that the farebox recovery ratio (i.e. the percentage of operating expenses covered by fares) for the future transit system, including the BRT, will remain at about the level that has been set by City Council policy in Resolution 00-29, CO-1, whereas a minimum of 27 percent and a maximum of 33 percent of the cost of operating the bus system should come from farebox revenue.

11. If local taxpayers are underwriting a substantial share of the operating costs, does it make any difference if the rider is a local resident, a mainland visitor, or a foreign visitor? Does the City and County have data showing the numbers of riders in each category at present and as projected under the BRT Alternative? Is not the equity issue a fundamental matter that should be addressed in the MIS/Draft EIS or in another actionable document prior to adoption of the MIS/Draft EIS?

Response: The City and County of Honolulu has data from the most recent on-board bus survey (1991) that distinguishes transit trips by local residents from non-resident trips (non-resident trips accounted for 11.4% of total transit trips in the survey). The survey did not distinguish non-

resident trips by home location of the non-resident, so non-resident trips include trips by residents of Neighbor Islands, mainland visitors and foreign visitors. For the 2025 Refined LPA forecast, non-resident trips account for around 10 percent of all projected transit trips. Operating costs for the Refined LPA, as for the other alternatives, would be paid for by fare revenues collected from residents and non-residents and by tax revenues generated by resident and non-resident economic activity.

12. Is there not a serious problem inherent in approving an MIS/Draft EIS and committing ourselves to a major transportation alternative without first resolving some of the basic public policy issues not explicitly addressed in that document?

Response: This is too vague a comment to respond to. It does not identify any specific public policy issues that were not addressed in the MIS/Draft EIS.

13. Generally speaking, we think that the recommended Bus Rapid Transit Alternative is the way to go.

Response: Comment noted.

14. Does it make sense to move buses to Kalakaua Avenue and eventually have an exclusive lane on that Avenue?

Response: See response to comment #2.

15. If the possibility of restricting Kuhio Avenue to transit vehicles and commercial vehicles, including four buses, trolleys and taxis, has been considered and discarded, that fact is neither stated nor documented in the MIS/Draft EIS.

Response: See responses to comments #2, #3, and #4.

16. Would not a restricted access to Kuhio allow the widening of the present abysmally narrow sidewalks on along that Avenue, contribute to a pedestrian orientation for Waikiki, result in an attractively landscaped Kuhio Avenue and reduce the use of Waikiki as a throughway for motor vehicles? I could not find any place in the MIS/Draft EIS where such questions are discussed.

Response: See response to comment #4.

17. The MIS/Draft EIS does not describe how shared use of an exclusive lane in Waikiki would work? Can it work? If the time between the planned tram vehicles is four minutes, will it be feasible for four buses and trolleys to share that lane, especially if these vehicles are engaging in loading and unloading passengers?

Response: See response to comment #5.

18. If it is impractical for four buses and trolleys to use the exclusive curb lane, where will they go to load and unload passengers? Would it not be inviting serious accidents to board and let passengers off in a non-curb lane? Has the City and County Administration engaged in sufficient consultation with private operators concerning the use of a shared lane? I could not find any place in the MIS/Draft EIS where such questions are discussed.

Response: See response to comment #6.

19. Does the MIS/Draft EIS consider what the impact of the proposed BRT Alternative will be on the economic viability of private transportation companies operating in Waikiki?

**Response:** See responses to comments #7 and #9.

20. Does that document consider the appropriate division of labor between the public transit system and private sector transportation providers?

**Response:** See response to comment #7.

21. If some of the private companies were to be driven out of business as a consequence of implementing the BRT Alternative, what would be the impact on City and County and State tax revenues? Is not a potential loss of public revenues a matter that should be considered in the MIS/Draft EIS or in another actionable document prior to adoption of the MIS/Draft EIS? I could not find any place in the MIS/Draft EIS where such questions are discussed.

**Response:** See response to comment #9.

22. What consideration has been given in the MIS/Draft EIS to the equitable division of operating costs between the riders and the taxpayers? Is there some ratio that makes sense?

**Response:** See response to comment #10.

23. If local taxpayers are underwriting a substantial share of the operating costs, does it make any difference if the rider is a local resident, a mainland visitor, or a foreign visitor? Does the City and County have data showing the numbers of riders in each category at present and as projected under the BRT Alternative? Is not the equity issue a fundamental matter that should be addressed in the MIS/Draft EIS or in another actionable document prior to adoption of the MIS/Draft EIS? I could not find any place in the MIS/Draft EIS where such questions are discussed.

**Response:** See response to comment #11.

24. What are the opportunity costs of using general obligation bonds to fund a portion of the cost of building the BRT system? What projects will have to be forgone if we use GO bonds to fund capital BRT costs while maintaining the current level of GO bond funding of the capital budget? I could not find any place in the MIS/Draft EIS where such questions are discussed.

**Response:** Table 6.1-13 of the FEIS provides the annual amount of GO bonds required for BRT. The amount of GO bonds is equal to the annual opportunity cost. The total of \$359.9 million is spread over 14 years, ranging from a low of \$5.3 million to a one time high of \$49.9 million. Although the total GO bond amount is lower in the DEIS, the opportunity cost would be higher since the \$320 million would have been concentrated in four years, at an annual amount of \$20 million, \$115 million, \$130 million and \$55 million. Since the number of years bonds are issued is increased, the new GO bond numbers in the FEIS represent a significant decrease in the annual amount and leave considerable amounts for other major projects, all within the City's Debt and Financial Policies as passed by the City Council in April, 2002.

It is not possible not within the scope of the EIS process to identify the actual projects that would not be funded on an annual basis but for the funds being used for Transit. The City Administration and Council would need to make those choices as part of the budget process, as they would for any other capital budget proposal.

25. Is there not a serious problem inherent in approving an MIS/Draft EIS and committing ourselves to a major transportation alternative without first resolving some of the basic public policy issues not explicitly addressed in that document?

**Response:** See response to comment #12.

26. Generally speaking, we support the BRT alternative.

**Response:** Comment noted.

27. First, in Waikiki, it does not look at the possibility of using Kuhio Avenue as an exclusive road for commercial vehicles, including the bus or the tram. And that may or may not be a reasonable possibility, but at least it should be examined. And in this document, it is not looked at.

**Response:** See responses to comments #2, #3, and #4.

28. The second area is that there will be an exclusive lane, according to the document, Waikiki and that this exclusive lane will be shared with commercial vehicles, four buses and trolleys. Would this work with a four-minute head time with unloading of passengers from the bus, the four buses? Is this going to work? And has there been sufficient examination of this question? And as best as I can tell, it is not examined in any detail in the MIS/DEIS document.

**Response:** See response to comment #5.

29. The third is that this proposed system is going to have some impact on private transportation companies on their economic viability, and some may go out of business, and there may be a reduction in City and County and State tax revenues. Maybe that won't occur. But the question isn't examined in this document anywhere that I can find.

**Response:** See responses to comments #7 and #9.

30. Fourth, there's some question of equity in terms of how much the riders should pay and how much the taxpayer should pay in terms of operating costs. This is an important question, because our lines serve, not just residents, but visitors as well from the mainland and from overseas. And this is a question that, as far as I can tell, is not examined in the EIS/MIS document.

**Response:** See response to comment #10.

31. Finally, there's question of opportunity costs when we use the City general obligation bond funds to fund this system. And we're talking about a level of funding from G.O. bonds so we will not increase our debt. But what are the projects that are not going to be funded because we are going to be funding this project? The matter of the opportunity costs has not been examined in this document.

**Response:** See response to comment #24.



32. Generally speaking, we think that the recommended BRT system is the way to go. We have a number of questions but this evening, however, I wish to focus on the proposed tram alignment in Waikiki and recommend an alternative to the use of Kalakaua Avenue which I think would be wise to consider.

Response: Comment noted.

33. Murray Towler's already outlined some of the problems that would occur on Kalakaua and what I'm going to suggest is consideration of the possibility of creating a beautiful well-landscaped pedestrian transport mall on Kūhio Avenue allowing us to use one project to move multiple Waikiki initiatives ahead simultaneously.

Response: See responses to comments #2, #3, and #4.

34. We need to revitalize Kūhio which is currently a kind of blot on Waikiki. We need to contribute to a pedestrian-friendly Waikiki. We need to reduce through traffic in Waikiki and we need to ensure the rapid movement of trams, city buses and four buses and trolleys.

Response: Since publication of the MIS/DEIS, the City has worked with the Waikiki Working Group and other interested parties in the Kalakaua and Kūhio Avenue corridors to redesign the BRT in Waikiki to minimize impacts on vehicular traffic on both streets and to maximize opportunities for widening sidewalks on Kūhio Avenue. Changes include allowing four buses and right turning vehicles to share the BRT lane on Kalakaua Avenue, and providing for a minimum of a combined eight feet of sidewalk widening on one or both sides of Kūhio Avenue. Appendix B shows the proposed configuration for Kūhio Avenue. As shown in FEIS Table 4.2-7, the impacts of the BRT on traffic operations in Waikiki will not be significant.

The BRT is meant to complement the local bus service in Waikiki by offering limited stop operations in bus priority lanes. As far as the affects to private tour vehicles and delivery vehicles, the Kalakaua/Kūhio loop maintains auto access as well as passenger and freight loading zones on Kalakaua and Kūhio Avenues.

35. I described in my written testimony how this mall would work or how I see it could work. But that would take me an extra minute to go into it. I'd be glad to if you give me the minute. I think we can make this pedestrian transport mall on Kūhio precise, joy and beauty. We can create attractive land, sidewalks, exquisite landscaping, handsome street furniture, good working street lighting.

Response: Based on the description provided on your proposed pedestrian-transport mall on Kūhio Avenue, it appears that the Refined LPA can provide the type of pedestrian amenities proposed without having to close the street to all but transit vehicles and pedestrians.

36. The Primary Corridor Transportation Project is going to absorb a large portion of the City's capital budget requirements for a number of years to come. If we don't include Kūhio Avenue revitalization now, it's going to be a long time in coming. And, I'm hoping that when the Council recommends its preferred alternative, it might include a provision requiring consideration of the creation of the Kūhio pedestrian mall.

Response: Pedestrian, landscape, and bus priorities improvements along Kūhio Avenue are part of the first increment of the Refined LPA proposed to be build (the initial to Waikiki branch).

37. Most of Kūhio, all except about three blocks, is five lanes wide. I would like one lane, split it between mauka and makai and widen those deadly narrow sidewalks on Kūhio. I would like the next lane, mauka and makai, and say that's the piece where there would be unloading of passengers and goods. And I'd like the two inner lanes and describe them as the movement lanes. And I would allow private vehicles on Kūhio for discharges of one to two, some places three blocks, to get access to their garages that already exist both hotel and residential in the poria cocheres.

Response: See first paragraph of response to comment #34.

38. I think any detailed study would show that creating a pedestrian transport mall on Kūhio would reduce the capacity in Waikiki to handle vehicles and particularly through traffic. And I think that's why it needs to be studied in some detail. But, I think one of the objectives is to make Waikiki a pedestrian friendly place that this will contribute to that end.

Response: See responses to comments #2, #3, and #4.

39. Generally speaking, we think that the recommended Bus Rapid Transit Alternative is the way to go.

Response: Comment noted.

40. This evening, however, I wish to focus solely on the proposed tram alignment in Waikiki and recommend an alternative to the use of Kalakaua Avenue. Establishing an exclusive lane on Kalakaua, even if four buses and trolleys are permitted to use that lane, will give rise to multiple problems.

Response: See response to comment #2.

41. Creating a beautiful, well-landscaped Pedestrian-Transport Mall on Kūhio Avenue allows us to use one project to move multiple Waikiki initiatives forward simultaneously:

- revitalize Kūhio, which currently is a blot on Waikiki;
- contribute to a pedestrian-friendly Waikiki;
- reduce through vehicular traffic in Waikiki; and
- assure the rapid movement of the Tram, City buses and four buses and trolleys in Waikiki.

Response: See responses to comments #3, #4, and #5.

42. Widen both the mauka and makai sidewalks by approximately six feet each (except in the two or three blocks where Kūhio is only four lanes wide), using the Local Motion and Nike Town sidewalks as models where appropriate.

Response: See first paragraph of response to comment #34.

43. Restrict vehicular traffic on the Kūhio Pedestrian-Transport Mall to the City Tram and buses, four buses and trolleys, taxis and other commercial vehicles.

Response: See responses to comments #3 and #4.

44. Allow passenger vehicles on the Mall for only one or two block lengths for gaining necessary access to or egress from hotel and residential parking areas and hotel port cocheras.  
**Response:** See responses to comments #3 and #4.
45. Use the mauka and makai lanes for loading and unloading passengers from the Tram, tour buses and trolleys and taxis and cargo from commercial vehicles.  
**Response:** The proposed concept on Kuhio Avenue is to use turnouts for passenger and freight loading. This will allow for additional sidewalk widening where loading turnouts are not required.
46. Use the mauka center lane for movement of allowed vehicles in the Ewa direction and the makai center lane for movement of allowed vehicles in the Diamond Head direction.  
**Response:** This is consistent with the Refined LPA.
47. Create a tram turnaround at the Diamond Head end of Kuhio by acquiring the vacant lot on the makai side and/or a small portion of Jefferson School on the mauka side.  
**Response:** Taking these properties is not necessary with the Refined LPA.
48. Make the Pedestrian-Transport Mall a place of joy and beauty by creating attractive sidewalks, exquisite landscaping, handsome street furniture and good looking street lighting and inviting private businesses to make their establishments equally attractive.  
**Response:** See response to comment #35.
49. The Primary Corridor Transportation Project is going to absorb a large portion of the City's capital budget capacity for at least ten years. If we do not use this Project to revive Kuhio Avenue now, it is unlikely that City capital improvement funds will be available for such a purpose anytime in the near future.  
**Response:** See response to comment #36.
50. We recommend that when the Council selects the preferred alternative that they include a proviso requiring consideration of the creation of a Kuhio Pedestrian-Transport Mall as an alternative to the proposed Kalakaua/Kuhio alignment.  
**Response:** The City Council selected the Kalakaua/Kuhio Loop as the preferred alignment.
51. Generally speaking, we think that the recommended Bus Rapid Transit Alternative is the way to go.  
**Response:** Comment noted.
52. The crucial element for the private transportation companies serving the visitor industry is service. A reputation for inadequate service is likely to lead to fewer visitors, which would have serious consequences for the visitor industry and in turn all of Hawaii including government. Has the MIS/Draft EIS taken into consideration the convenience of the visitors who are served by the private transportation carriers?

- Response:** Based on analysis of potential impacts on private transportation providers in Waikiki as discussed in FEIS Section 5.1.5, private transportation providers will not be affected by the Refined LPA since they service different travel markets. Visitors will still be able to use the services of private transportation carriers.
53. Does it make sense to move City buses to Kalakaua Avenue? Why is it being suggested that they be moved?  
**Response:** See response to comment #2.
54. Will the concept of having the BRT trams share the lane with private tour buses and trolleys work? Will private tour buses and trolleys be allowed to stop to load and unload passengers in the shared lane? Would not such loading/unloading operations tend to interfere with the timely movement of the frequent BRT trams?  
**Response:** See response to comment #5.
55. If such a situation arises, is it not likely that curbside loading and unloading of private tour buses and trolleys along the makai lane of Kalakaua would be banned? If it is impractical for private tour buses and trolleys to share the exclusive curb lane, then would the private tour buses and trolleys go? Would it not be inviting serious accidents to board and let passengers off in the mauka lane or a non-curb lane?  
**Response:** The Refined LPA has a semi-exclusive makai curb BRT lane on Kalakaua Avenue explicitly to allow sharing with buses and trolleys. There is no need to relocate tour buses or trolleys to the mauka lane.
56. Has the possibility of creating a Pedestrian-Transport Mall along Kuhio Avenue, restricted to City buses and trams and commercial vehicles, including tour buses, trolleys, taxis and limousines, and allowing limited private vehicle access to garages and hotel port cocheras, been considered? Would not restricted access to Kuhio allow for the widening of the present abysmally narrow sidewalks along that Avenue, contribute to a pedestrian orientation for Waikiki, result in an attractively landscaped Kuhio Avenue, reduce the use of Waikiki as a throughway for motor vehicles and facilitate accomplishing two major capital-intensive endeavors with a single project?  
**Response:** See responses to comments #3, #4, #5 and #6.
57. Has another alternative, namely, moving the BRT from Diamond Head on Kuhio and Ewa on Ala Wai Boulevard been examined?  
**Response:** In response to comments by the Waikiki Working Group, a Kuhio Avenue-Ala Wai Boulevard Loop as proposed was evaluated. The problems with this concept are: 1) the additional walking and/or ride time for the majority of BRT users since it is further away from the concentration of destinations along Kalakaua Avenue, and 2) need for all users to cross Ala Wai Boulevard when going to or from stops on this street (This is because Ala Wai Boulevard has development on only one side of the street).
58. What is the impact of the proposed BRT Alternative on the economic viability of private transportation companies operating in Waikiki?  
**Response:** See response to comment #7.

59. What is the appropriate division of labor between the public transit system and private sector transportation providers?

**Response:** See response to comment #7.

60. If some of the private companies were to be driven out of business as a consequence of implementing the BRT Alternative, what would be the impact on City and County and State tax revenues? Does not Federal law require that in the planning of new transportation programs, to be financed from federal funds, consideration be given to preserving and utilizing existing transportation facilities, both public and private?

**Response:** See response to comment #9. DTS has no intent to negatively affect private bus companies, and to the contrary is proposing improvements that will benefit private companies.

61. Furthermore, does not federal law require that in planning such new systems overall social, economic, energy and environmental impacts be considered (underlining added)?

**Response:** Yes, and these are all presented in the MIS/DEIS and FEIS Chapters 3 and 5.

62. What consideration has been given to determining an equitable division of operating costs between riders and taxpayers? Is there some ratio that makes sense? Is the current 1:3 ratio the proper ratio? Is not the ratio closer to 1:1 for most mainland municipal transportation systems?

**Response:** See response to comment #10. According to the 1998 National Transit Database, Honolulu's farebox recovery ratio (percentage of operating costs paid for by farebox revenues) was 27.8 percent (including TheBus and TheHand-Van services). In 2001 the City Council passed a resolution requiring that fares cover at least 27 percent of the bus system operating and maintenance costs. The national average for urbanized areas between 200,000 and 1,000,000 in population is 24.9 percent.

63. If local taxpayers are underwriting a substantial share of the operating costs, does it make any difference if the rider is a local resident, a mainland visitor, or a foreign visitor? Does the City and County have data showing the numbers of riders in each category at present and as projected under the BRT Alternative? Is not the equity issue a fundamental matter that should be addressed at this time?

**Response:** See response to comment #11.

64. What are the opportunity costs of using general obligation bonds to fund a portion of the cost of building the BRT system? What projects will have to be forgone if we use GO bonds to fund capital BRT costs? Is it not possible to review the CIP appropriation bills for the past three years and prepare a fairly accurate list of the projects that will not be undertaken during the construction of the BRT, given the commitment to level CIP funding and current bond limits? Is making such a list public an essential part of an open evaluation process that allows citizens to make informed judgments?

**Response:** See response to comment #24. The three peak years for issuing bonds are FY 2004-2006, in the amounts of \$45.7 million, \$49.9 million, and \$46.6 million, respectively. This cash flow projection reflects a conservative estimate that is actually more conservative than the City's current debt authorization. No known existing projects will need to be deferred, since the

financing for these have already been accounted for. One cannot guess about future projects by virtue of reviewing previous CIP lists. In the FEIS, projections of GO bonds through FY 2008 were provided by the Department of Budget and Finance. Final financing decisions are a policy choice made by the City Council at the time a budget is approved.

65. Is the City involved in a basic conflict of interest? Can it be both a regulator, creating a level playing field for all private operators, and an entrepreneur, operating a highly subsidized public transit system, without getting these two roles confused? Will not the City's desire to promote the well-being of its own enterprise take precedence over other choices in a manner that will be detrimental to privately owned, fair-paying transportation businesses? Are there not already examples of the City using its privileged position as policy-maker and entrepreneur to compete unfairly with privately owned transportation companies...?

**Response:** The City's involvement in being the local sponsor for the BRT project is not a conflict of interest with the City's responsibility to implement an efficient transportation system that enhances mobility, reduces travel time and improves the quality of life for Oahu's residents.

The City Charter in assigning roles and responsibilities recognizes that the City can be a regulator, fairly overseeing private operators in addition to operating the public bus system. Since the travel markets served by private operators such as taxis, shuttles, etc., are distinctly different from that served by the BRT, private operators will still need to be served that current markets even with implementation of the Refined LPA.

Implementation of the PCTP including implementation of the hub-and-spoke bus system provides many opportunities for privatization. The concept of the hub-and-spoke bus system includes circulator buses collecting riders from certain routes "spokes" and dropping them off at various "hubs" in the community located along the main transit spine. There may be opportunities for the circulator routes to be operated by privately owned transportation providers.

There would also be opportunities at the transit stops for private development to provide various types of retail establishments to serve the transit users and the general public.

66. How precise are the estimates of costs, revenues and ridership and other projections ten and twenty years hence, which are put forth in the MIS/DEIS? Is there not a margin of potential error in such projections? If so, what is the margin of error that applies to each class of data? With what degree of accuracy can a ridership of 333,000 trips per day be projected for the BRT Alternative in the year 2025? How accurate is the figure of \$1,060,300,000 capital costs over 25 years for the BRT Alternative (expressed in 1998 dollars)?

**Response:** The cost estimate accuracy is +/-15 percent. The revenue estimates from federal formula grant sources are very precise, based on actual authorized amounts in the given years. For the years beyond the authorized amounts, the formula grant numbers are based on increases that are less than the historical trend. Estimates of revenues from the New Starts program are based on the discussions with federal officials and Hawaii Congressional members and their understanding of what would be realistically available. The federal highway fund dollars are based on a shared amount of the total funds received by the State, and the actual draw down that has occurred for these funds by various projects. General Obligation Bonds as a revenue source are estimated based on a formula that balances the obligated and current debt, and ensuring that there is sufficient debt capacity for other City projects on a year-to-year basis.

The ridership forecasts are based on population and employment projections adopted by the Oahu Metropolitan Planning Organization and use of state-of-the-art travel demand models. The travel demand models have been calibrated against current ridership, and reviewed. These steps result in the ridership forecasts being as accurate as they can be. Any uncertainty in the ridership forecasts applies equally to the No-Build, TSM, and Reformed LPA Alternatives. Thus, the ridership forecasts are most reliable when used for relative comparisons.

67. The E-Now Corporation is ready to work with you and others in refining the BRT alternative as it relates to Waikiki.

**Response:** Thank you for your participation in the Waikiki Working Group and other public forums.

68. Creating a beautiful, well-landscaped pedestrian-Transit Mall on Kulo Avenue would allow the City to use one project to move multiple Waikiki initiatives forward simultaneously:

- revitalize Kulo Avenue, much of which is currently a blot of Waikiki;
- contribute to a pedestrian-friendly Waikiki;
- reduce through vehicular traffic in Waikiki; and
- assure the rapid movement of the Tram, City buses and tour buses and trolleys in Waikiki.

**Response:** See responses to comments #3, #4, and #5.

69. The Mall, in general terms, would work this way:

- Widen both the mauka and makai sidewalks by approximately six feet each (except in the two or three blocks where Kulo is only four lanes wide), using the Local Motion and Nike Town sidewalks as models where appropriate.
- Restrict vehicular traffic on the Kulo Pedestrian-Transit Mall to the City Tram and buses, tour buses and trolleys, taxis and other commercial vehicles.
- Allow passenger vehicles on the Mall for only one or two block lengths for gaining necessary access to or egress from hotel and residential parking areas and hotel port cocheres.
- Use the mauka and makai lanes for loading and unloading passengers from the Tram, tour buses and trolleys and taxis and cargo from commercial vehicles at designated locations.
- Use the mauka center lane for movement of allowed vehicles in the Ewe direction and the makai center lane for movement of allowed vehicles in the Diamond Head direction.
- Create a tram turnabout at the Diamond Head end of Kulo by acquiring the vacant lot on the makai side and/or a small portion of Jefferson School on the mauka side.
- Make the Pedestrian-Transit Mall a place of joy and beauty by creating attractive sidewalks, exquisite landscaping, handsome street furniture and good looking street lighting and inviting private businesses to make their establishments equally attractive.

**Response:** See responses to comments #3, #34, #35, and #45.

70. The above bullets describe in general terms how a Kulo Avenue Pedestrian-Transit Mall might work. Clearly a systematic planning study is required to flesh out: (1) the details of how the Mall would operate, including specifying how traffic would move onto, off of and across Kulo; and (2) estimates of the resulting vehicular traffic load on Kalaniana'olaha Avenue and Ala Wai Boulevard.

**Response:** With the Reformed LPA, Kulo Avenue will be accommodating mixed-traffic in addition to a shared BRT lane.

71. The Primary Corridor Transportation Project will absorb a large portion of the City's capital budget capacity for at least ten years. If the City does not use this Project to revive Kulo Avenue now, it is unlikely that City capital improvement funds will be available for such a purpose anytime in the near future.

**Response:** See response to comment #36.

72. We generally support the intent of Resolution 00-249 relating to the selection of a Locally Preferred Alternative for the Primary Corridor Transportation Project. We have, however, a number of questions, which require attention and which are not addressed or adequately considered in the MIS/Draft EIS. We also are offering language for a friendly amendment to the Resolution.

**Response:** Comment noted.

73. We have listed our questions in our November 6, 2000, letter to Cheryl Soon, Director of the Department of Transportation Services. That letter and an addendum thereto describing how a Pedestrian-Transit Mall on Kulo Avenue might work are attached to this testimony. Our questions relate to:

- The nature of the Visitor Industry;
- The Shared Lane on Kalaniana'olaha Avenue;
- A Pedestrian-Transit Mall on Kulo Avenue;
- Economic Viability of Private Transportation Companies;
- Equitable Division of Operating Costs;
- Opportunity Costs of Using General Obligation Bonds
- Competing with Privately Owned Transportation Companies;
- Statistical Precision.

We hope you will take time to study our questions and secure responses to them before you take final action on Resolution 00-249.

**Response:** Comment noted. Your comments have been taken into account.

74. Finally, we urge you to amend the first "Be It Further Resolved" clause of the Resolution by adding the following words at the end of that clause: "provided that consideration is given to realigning the transit spine in Waikiki so as to avoid using Kalaniana'olaha Avenue." If such a proviso is not added to the Resolution, we urge you to incorporate such a request for consideration of the alignment in Waikiki in your Committee Report.

**Response:** See response to comment #50.

Part B - SDEIS Comments

75. I'm speaking today on behalf of the E-Now Corporation, a private passenger transportation company. Let me make it clear that we strongly support an excellent mass transit system for Oahu residents.

**Response:** Duty noted.

76. And today I want to focus on some of the shortcomings in the SDEIS. The SDEIS implies that the Waikiki Working Group, which was not convened until August of 2001, completed its work in October 2001. For reasons that are hardly persuasive, there were no meetings of the Waikiki Working Group from October 2001 to April 9, 2002, at which time, the members were informed that that was their next to last meeting.

Response: The SDEIS Appendix A, Section A.2.1, states that the working groups were formed in 2001 and at the time the SDEIS was published the Waikiki Working Group had had three meetings. FEIS Appendix A reflects the other Waikiki Working Group meetings on April 6<sup>th</sup> and 22<sup>nd</sup>, 2002. Working Groups will be reconvened during the next phase (final design) of the project.

77. The SDEIS states that no capital projects will be deferred as a result of selecting the Refined BRT Alternative. It's hard to imagine, however, that if one is spending money on one project that it has no impact on the availability of funds for other projects.

Response: The FEIS has clarified the statement to indicate that there are no presently known major capital improvement projects that will need to be deferred as a result of funds being used to implement the Refined LPA.

78. Three, the SDEIS states that the delay to motorists -- and I quote -- "The delay to motorists is expected to accelerate a switch in travel behavior: from automobiles to transit," end of quote. But it provides no research data from other major American metropolitan areas to support this assertion.

Response: The FEIS corrects this statement so that it is clear that it is not the conversion of lanes that will create the congestion, the congestion for motorists will be there without the BRT. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

There is clear evidence from numerous cities that have implemented enhanced transit systems that a significant number of people will divert from autos to transit when the system provides sufficient time savings and/or reliability. The amount of diversion from autos needed in the primary corridor to realize the ridership forecasts is less than 2 percent.

79. Fourth, the SDEIS states that 5.5 times as many transit riders are foreseen on the Regional BRT and the local buses as on the In-Town BRT. But then it provides no rationale as to why construction should begin with the In-Town portion, as opposed to the Regional BRT, that will serve people who currently have the longest and most time-consuming commutes.

Response: The In-Town BRT is proposed to proceed ahead of the Regional BRT so that SDOT widening of H-1 can be coordinated with the Regional BRT improvements.

80. Fifth, the SDEIS shows that the level of service -- LOS, in the lingo of the engineers -- in Waikiki from Saratoga for the Refined BRT will provide only a slight improvement over the LOS for autos, particularly if the sidewalks along Kuhio are widened as planned. So the question arises, why bother taking the BRT, the In-Town BRT, further than Saratoga?

Response: Continuing the In-Town BRT around the Kalakaua/Kuhio Loop is for the convenience of the riders. Terminating service at Saratoga as suggested, without the loop, would on average

result in riders having to walk an extra 16 minutes for Waikiki residents, and 10 minutes extra for Waikiki workers.

81. The SDEIS provides no data on alternative routings of the In-Town BRT within Waikiki.

Response: A discussion on alternative routings that were considered for Waikiki has been added to Chapter 2 in the FEIS.

82. Seven, the SDEIS includes a short section on the economic impact on tour operators, which it provides no research to support the assertions in there.

Response: The survey of bus riders that was shared with the Waikiki Working Group members and the OMPPO travel surveys confirm that the level of usage of the public transit system by non-residents is between 10 and 15 percent overall. This is consistent with the surveys of bus riders done as part of the OMPPO model development process.

83. In conclusion, we strongly favor excellent public mass transit for Oahu residents. The questions we and others have raised need to be resolved, not just swept under the table before proceeding.

Response: Comment noted. There is no intention of sweeping issues under the table.

84. The Absence of a Multi-Modal Transportation Plan for Honolulu. There is no current over-all multi-modal transportation plan for Honolulu based on continued use of private vehicle automobile transportation, which supports the automobile within a policy context that provides for mitigating its environmental, resource and movement impacts, while increasing other transportation choices, such as public transit, car-pooling, van-pooling, bicycling, walking, flexible work hours and telecommuting, among other strategies. The Draft Supplemental EIS does refer to the public review drafts of the Primary Urban Center and Ewa Development Plans and to the Oahu Metropolitan Planning Organization's Transportation for Oahu Plan (TOP 2025) and to the City's own Islandwide Mobility Concept Plan. All of these are useful documents; particularly the Islandwide Mobility Concept Plan, but none of them is a multi-modal transportation plan for Oahu. Transportation in the modern metropolitan community not a matter of private car versus public transit, but rather how to fit all the multiple means of transportation together, as well as mitigating the need for transportation and relating land-use and transportation developments, into an integrated, multi-modal transportation plan, as the Islandwide Mobility Concept Plan recognizes.

The absence of multi-modal transportation, within which the proposals put forth in the Supplemental Draft EIS fit, makes the SDEIS a deficient and inadequate document, which should be rejected.

Response: The OMPPO's Transportation for Oahu Plan, TOP 2025, adopted in April 2001, is Oahu's multi-modal transportation plan. The plan includes highways, public transit, van-pooling, and bicycling projects.

85. The Failure to Consider a Range of Alternatives Generally. The original MIS/Draft EIS considered three alternatives, namely, no-build, TSM and BRT. (See S.2.1, pp. S-34). The fixed rail alternative, whether light or heavy, was not analyzed in detail in the initial MIS/Draft EIS. (See pp. 2-2/4, MIS/Draft EIS Primary Corridor Transportation Project, City and County of Honolulu, Department of Transportation Services, August 2000.) The possibility of a right-of-way that might potentially provide a separate grade system for a portion of the transit route was not mentioned in the initial Draft MIS/EIS nor in the SDEIS.

**Response:** Chapter 2 of the DEIS and FEIS explains why rail alternatives were dropped after the initial evaluation of a wide range of alternatives. An elevated rail system was rejected by elected officials and the public early on due primarily to its high cost which would necessitate an increase in taxes, and its unattractiveness.

Light rail was rejected after a more detailed examination, once it was determined that a BRT system could achieve virtually all of the benefits of light rail at 35 percent less cost, and with greater operating flexibility to serve the primary corridor.

86. There is no consideration of the potential for expanding the van pool system nor increasing the use of flexible working hours now expanding the portion of the work force employing telecommuting or other alternative strategies in the SDEIS.

**Response:** The OMP's Transportation for Oahu Plan, TOP 2025 includes a van-pool program element and a travel demand management element.

87. Perhaps none of these alternative strategies would contribute to easing Honolulu's transportation problems, though that is hard to believe. Perhaps some would turn out to have a low cost-benefit ratio and therefore should not be selected. Not having subjected alternative strategies to serious examination and detailed, objective analysis in the SDEIS makes the SDEIS a deficient and inadequate document, which should be rejected.

**Response:** The Primary Transportation Corridor Project is one component of a larger transportation system, as the OMP's Transportation Plan for Oahu Plan, TOP 2025 outlines. Chapter 2 of the FEIS summarizes the broad range of alternatives considered and eliminated during project development.

88. The Failure to Consider a Range of Alternatives in Waikiki. The Draft Supplemental EIS fails to consider a range of alternatives for Waikiki. The route laid out in the SDEIS, namely, Diamond Head on Kalanika'ula, mauka on Kapahulu and mauka on Kuloa, was the single alternative specified in the original MIS/Draft MIS and is the single alternative put forth in the current supplemental EIS. Three other routes were proposed early in the Fall of 2001 in the Waikiki Working Group, the last of the working groups to be convened.

**Response:** The alternative routes that were considered for Waikiki and that were presented to the Waikiki working group are discussed along with the reasons for their rejection in Chapter 2 of the FEIS.

89. Actually, this working group met first in August 2001 and then once or twice again in the fall and then was recessed by the Department of Transportation Services (DTS). The Waikiki Working Group was subsequently reconvened in April 2002. (S 2.2, p. S-5 misstates this chronology.) At its first meeting in April 2002, it was announced by DTS that this would be the next to last meeting of the Waikiki Working Group. The reasons offered by DTS for the long recess were less than totally persuasive.

**Response:** The FEIS Summary has been revised to reflect that the Waikiki Working Group met through April 2002.

90. At the end of this next to last meeting in April, a document was presented by the consultant that showed that none of the alternative Waikiki routes, in their view, was as good as the DTS preferred route. The consultant used a single criterion and data related to that criterion in

reaching its conclusion. The single criteria was time convenience to potential passengers in Waikiki. Neither DTS nor the consultant considered any other criteria, such as impact on traffic flow or street life or on rehabilitation of run-down areas or on the uniqueness of Waikiki as an urban resort area or on the economic well-being of businesses serving Waikiki. There was one criterion, selected by DTS and the consultant, and that was it.

**Response:** As was presented at the working group meeting, criteria used in the analysis of alternative alignments in Waikiki, included many others besides time or walking distance convenience to BRT users. Other factors considered and presented to the working group were: safety to passengers (e.g. of having to cross Ala Wai Boulevard whenever going to-or-from a BRT stop); impacts to motorists; impacts to private passenger carriers; impacts to freight deliveries; ability to widen and add landscaping along Kuloa Avenue; and, impacts to BRT operations.

91. With respect to ending the In-Town BRT at Saratoga, the consultant did not consider the possibility of combining a Saratoga Terminus with a Waikiki Circulator, designed to reflect and enhance the unique nature of Waikiki. This analysis could have been conducted using several alternative schemes that varied the routes, the number of stops, and the charges, such as allowing free transfers. In failing to consider this alternative, the SDEIS simultaneously neglects to consider the capital and operating costs of a circulator versus the capital and operating costs of the BRT on the route that DTS had preselected. Since the alternatives were proposed in Fall 2001, but data were not provided until April 2002 at the next to last meeting of the Waikiki Working Group, and well after the Draft Supplemental EIS had been issued, the likelihood that there was to be serious consideration of these alternatives was, to say the least, minimal.

**Response:** Forcing all BRT passengers to transfer at Saratoga Road to another mode for the trip around the Kalanika'ula Loop is unreasonable given that this segment would represent the last 10 percent of their trip.

92. Furthermore, the Supplemental Draft EIS fails to make clear the justification for spending significant amounts of money on the Waikiki leg of the In-Town BRT beyond Saratoga when the Draft EIS states that the peak hour level of service (LOS) for the Refined BRT and for automobiles beyond Saratoga will be exactly the same, assuming the sidewalks along Kuloa are widened as anticipated. (Table 4.2.7, p. 4-19.) At the Saratoga Road and Kalanika'ula intersection, transit will yield a one or two LOS advantage. (Ibid.)

**Response:** Continuing the In-Town BRT around the Kalanika'ula Loop is for the convenience of the riders. Terminating service at Saratoga as suggested, without the loop, would on average result in riders having to walk an extra 16 minutes for Waikiki residents, and 10 minutes extra for Waikiki workers.

93. The consultation process in Waikiki was further flawed by DTS's refusal to release to the Working Group members and the public copies of the Maitson Report, which was presented verbally at a fall meeting of the Waikiki Working Group. Maitson and his colleagues interviewed users of TheBus in Waikiki. DTS draws on the Maitson Report to support one of the assertions it puts forth in the Supplemental Draft EIS. (See "Economic Impacts to Tour Bus Operators, pp. 5-19/20.) The Report was commissioned by DTS and paid for using taxpayers' monies and yet DTS to date has not been willing to release the Report nor to explain why it is refusing to release the Report. One can only speculate as to why DTS has sat on the Report and none of the potential reasons reflects well on DTS. It is very difficult to comprehend how refusing to release the Maitson Report contributes to an open and informed participatory review process. One could also raise the question of whether DTS has the legal right to suppress the Maitson Report.

Response: A copy has been sent to you of the Mattison Sunderland survey data that was shared with the Waikiki Working Group members, which E Noa was a participant.

94. The failure to examine the alternative routes suggested for Waikiki in a timely, serious and thorough manner using multiple criteria, the inexcusable commitment to continue with the Waikiki leg when it offers almost no improvement in level of service vis a vis the automobile and the suppression of the Mattison Report make the SDEIS a deficient and inadequate document, which should be rejected.

Response: See responses to comments #88, #90, #91, #92, and #93.

95. The Economic Impact of the In-Town BRT on the Tour Bus Operators. The Supplemental Draft EIS asserts that the In-Town BRT will not adversely affect the economic well-being of the tour bus operators. (See 5.1.5, pp. 5-19/20) It reports that visitors account for approximately five percent of total daily boardings system wide and between 20% and 25% of boardings in Waikiki. The SDEIS cites CMPO, though it is not clear what CMPO Report the SDEIS is referring to, and the never-released Mattison survey as source documents. It further states that visitor trips are projected to constitute approximately 7.7% or 6,100 of the 79,300 boardings using the In-Town BRT. The section concludes that the number of visitors using the BRT will be no greater proportionally in the future than it is today. It further concludes that, "It is not expected that the tour bus operators will be adversely affected due to the relatively low number of tourists that are expected to choose BRT for their travel needs." No economic analysis is provided to substantiate these conclusions.

Response: See response to comment #82.

96. We maintain that the government should not drive legitimate private businesses out of business or reduce their opportunities to engage in business by offering subsidized services that compete with the services offered by those businesses. To do so not only damages private enterprise, deprives employees of work, cuts into tax revenues, but also contributes to Hawaii's reputation as an unfriendly place to do business.

Response: See response to comment #2.

97. With In-Town BRT service every four to six minutes along Kalakaua and Kuhio, 21 hours a day, it would simply be phenomenal if the number of visitors using the In-Town BRT did not increase. The City Administration is using taxpayers' money to compete head-on with taxpayer private businesses. Federal Transit Administration Circular C 9300.1A, Section 4, Subsection 9 (a) states in part, "Specifically, FTA is prohibited from providing federal assistance to a governmental body that provides service in competition with, or supplemental to, service currently provided by private transportation company, unless FTA finds that the local transportation program developed in the planning process provides for participation by private transportation companies to the maximum extent feasible."

Response: See response to comment #7. The BRT will not be competing with the private sector, since it is designed to serve trip patterns of Oahu residents, whereas the private transit services are designed to serve tourists.

98. To the best of our knowledge, neither DTS nor its consultants has systematically solicited data from tour operators to determine what those in the tour business and related transportation services have concluded would be the impact of the In-Town BRT on their businesses. Further, the Draft

Response: Several tour bus operators were invited to attend the working group meetings and some attended those meetings and some chose not to attend. The Waikiki and Kalakaua bus rider survey data was presented at the respective working group meetings. The Mattison Sunderland Report is available from the DTS.

99. The Supplemental Draft EIS asserts no damage to the tour operators, but assuming DTS is wrong and there is damage, what recourse would the tour operators have? Could they recover their losses from the City because the assertion in the Supplemental Draft EIS was incorrect? The answer to that question is undoubtedly "no."

Response: The tour bus industry operates in a competitive environment with significant global influences (most dramatically seen during the Gulf War and immediately after September 11, 2001). These factors have far more influence than the local public transportation system which has been in place for decades. The public transit system is designed to serve Oahu residents, whereas tour bus operators serve the visitor industry.

100. There is nothing in the Supplemental Draft EIS that provides a guarantee that the City might not increase its number of stops in Waikiki to six or seven or eight. There is nothing in the Supplemental Draft EIS that provides a guarantee that tour operators will be able to continue to share the currently planned semi-exclusive lane along Kalakaua Avenue if the City decides, in its wisdom, at some future date that sharing the lane is interfering with the smooth operation of the In-Town BRT.

Response: If experience shows that shared operation of the semi-exclusive lanes in Waikiki with private carriers is significantly impeding the operations of the public transit system, the City should be able to take corrective measures to restore the service to an acceptable level. By placing restrictions on the size of buses that can use the lane (e.g. only 30 passengers or greater), the location of stops, and the dwell time permitted, this should not be an issue.

101. The City's track record demonstrates that the City Administration is not concerned with the economic well-being of the tour operators. The City Administration is currently aggressively competing with the private tour operators by seeking to provide public subsidized transit service to visitors as witness: (1) The Bus Guide for visitors in English in Japanese, with an introduction by the Mayor; (2) the monopoly of Hanalei Bay by TheBus with Route 22 serving visitors almost exclusively, even though multiple ways to protect the fragile Hanalei Bay environment exist other than by establishing a City monopoly on multi-passenger vehicle transportation to and from the Bay; and (3) and (c) and planning of the Waikiki leg of the In-Town BRT without adequate consultation with the transportation carrier industry. (See Federal Transit Administration Circular C 9300.1A, Section 4, Subsection 9.)

Response: The assertions have been refuted both publicly and privately in the past. The bus guide published in Japanese is not produced or paid for by the City. As is the case in most tourist oriented cities, the welcoming by the mayor is provided to all publishers of tourist oriented literature as a gesture of good will, not one of competition. The restrictions placed on private carriers access to Hanalei Bay was done by the City's Department of Parks and Recreation to protect the fragile environment. Route 22 is the "Beach Bus" which serves local residents as well as tourists at stops all along the coast between Ala Moana Center and Sea Life Park. Hanalei Bay is only one of its stops.

102. The failure of the City to substantiate its assertion that the In-Town BRT will not damage the tour operators economically and the track record of the City in seeking to aggressively compete with private operators further demonstrates that the SDEIS is a deficient and inadequate document, which should be rejected.

**Response:** The economic effects to tour bus operators are presented in the SDEIS and FEIS Section 5.1.5. The public transit system is designed to serve the Oahu residents, whereas the tour bus operators serve the visitor industry.

103. The Financial Implications of BRT. The City is in dire financial straits. The Administration is proposing to balance the operating budget by bond restructuring (\$53 million), tapping the Sewer Fund, even though the projected sewer and wastewater capital cost are estimated to rise from \$81.4 million in 2002 to \$257.9 million in 2009. The use of the H-Power Fund for underwriting the cost of residential refuse collection (\$18 million) and sale of land (\$15 million). Furthermore, the City Department of Budget and Fiscal Services projects that annual debt service payments will increase from \$104 million in 2002 to \$271 million in 2009 based on the assumption that interest on all new debt will be at 5% per annum. As the annual debt service increases, it will become the largest single expenditure item in the City's operating budget.

**Response:** Comment noted.

104. There is almost no possibility that the interest rate on new city debt will remain at 5% per year. Nationally, the basic interest rate is likely to rise from its very low current base as the national economy recovers and the Federal Reserve Bank raises its benchmark interest rates. Further, as Honolulu debt service increases as a portion of the total operating budget and Honolulu's financial position becomes increasingly fragile, there is a very high likelihood that either Honolulu's credit rating will slip, thus increasing the cost of borrowing to the City, or that the property tax rate will need to be raised so as to be able to pay for both debt service and the cost of operating police, fire and other municipal services.

**Response:** The financial terms and conditions of the GO bonds assumed in the financial analyses are a 20-year maturity with a 6.25 percent interest rate. The interest rate reflects the Bond Buyer 11 High Grade GO Bond Index. The amount of GO Bond proceeds used as a revenue source on an annual basis was developed in keeping with the City's Debt and Financial Policies as passed by the City Council in April, 2002, leaving significant capacity in any given year for other major capital projects.

105. The Supplemental Draft EIS provides three assurances, which appear to be based on very shaky foundations, given the City's present and future financial conditions: (1) The BRT can be funded without raising taxes (see S.4, pp. S-15/16); (2) no major capital projects will be deferred as a result of selecting the Refined BRT (see S.4, p. S-18); and (3) the State will pay the estimated \$760,000 that it is estimated that it will cost annually to operate the Zipper Lane (see 6.1.2, p. 6-5).

**Response:** (1) The financial plan was developed to ensure that the costs would be phased, and would be paid for with a combination of mostly federal and some local revenue sources, in order to ensure that no taxes would need to be raised. (2) The level of GO bond funds used in any given year has been significantly lowered to allow for other major projects. It is possible that the Council may choose to defer authorizing some new projects if they are in the range of \$44 to \$46 million in Fiscal Years 2004-2006. (3) The Zipper Lane is part of the Interstate highway system. It is a reasonable assumption for a highway component to be paid for with highway funds.

106. Given the financial situation of the City, as briefly outlined above, the likelihood that the City is not going to have to raise taxes in the near future appears slim indeed. Some portion of the increased taxes will be attributable to the BRT Project, so for the Supplemental Draft EIS to state that taxes will not have to be raised to fund the BRT rings hollow indeed.

**Response:** The financial plan was constructed in a way to pay for the project without having to increase taxes to raise revenue for the project.

107. Some capital projects will undoubtedly be deferred as a result of selecting the Refined BRT alternative since the City money expended on the BRT will not be available to be expended on other CIP projects. The cost of proposed capital projects always exceeds the funds available. If the BRT is funded out of the capital budget, then there will be projects that will have to be deferred or forgotten about.

**Response:** There are no known major capital improvement projects that will have to be deferred as a result of priority being given to BRT.

108. The City in the Supplemental Draft EIS assumes that the State will pay the estimated \$760,000 that it is projected that it will cost annually to operate the Zipper Lane, thus reducing potential annual operational costs to the City by that amount. No evidence is provided in the Draft that the State has agreed to or will be willing to assume these costs. To date, the State has not indicated any willingness to fund any of the cost of the BRT. In fact, the MIS/Draft EIS, issued in August 2000, assumed that the State would participate in funding the capital costs of the BRT. (See Table 4-1, p. S-18, MIS/Draft EIS Primary Corridor Transportation Project, City and County of Honolulu, Department of Transportation Services, August 2000.) When the State indicated that it had no plans to assist in funding the BRT, the City stated it would assume the share of the cost initially allocated to the State.

**Response:** The State is currently considering the Zipper Lane as a State project. As such, it is not unreasonable to assume that the State would maintain a State project.

109. The City has included detailed projections of operating costs, capital costs and ridership in the Supplemental Draft EIS. All of these projections are offered as fixed figures. How precise are the estimates of costs, revenues and ridership and other projections ten and twenty year hence, which are put forth in the SDEIS? Is there not a margin of potential error in such projections? If so, what is the margin of error that applies to each class of data?

**Response:** See response to comment #66.

110. With what degree of accuracy can a ridership of 291,900 trips per day be projected for the BRT alternative in the year 2025? (See Table S.6.1, p. S-21.)

**Response:** See response to comment #66.

111. How accurate is the figure of \$1,062,500,000 capital costs over 25 years for the BRT alternative (expressed in 1998 dollars)? (ibid.)

**Response:** See response to comment #66.

112. How trustworthy is the estimate that operating costs will be \$180,100,000 when the system is fully operative? (ibid.)



**Response:** Many factors affect the actual operating and maintenance (O&M) costs. Key factors include the operating plan, which determines how much services will be provided, scheduling practices, which are affected by the terms of the labor agreement as negotiated from time to time; labor rates and costs of other inputs such as fuel, tires, etc. The best that can be said is that if the fully-operative service plan were in operation at today's costs, using today's production techniques, and providing the SDEIS level of service, the \$180 million cost estimate would be accurate within a percent or two.

As an example of the way in which the factors interact, subsequent to publication of the SDEIS it was decided to study the effect of not building some of the capital improvements, relocating some of the transit centers, and otherwise modifying the services to be provided. The omission of capital investment led to an increase in transit travel times, which in turn resulted in a decline in ridership, which in turn meant that less bus service was necessary. In the course of this analysis, we also updated the O&M cost model to use the cost inflation actually experienced by OTS, which was 2.7% during the two-year period from 2000 to 2002. Earlier estimates had assumed an annual inflation rate of 3.5%. The net effect of all these changes was to reduce the O&M cost to \$150 million.

Finally, it must be kept in mind that the costs are presented in current-year (2002) dollars, not year-of-expenditure. The future-year dollar costs can be affected by the rate of inflation actually experienced.

113. Are not cost-overruns on major capital projects built by governments frequent?

**Response:** It is difficult to compare actual costs to planned costs for large complex public works projects since often the scope of the project changes between the planning and construction phases. Often these differences have been mischaracterized in the funds as "cost overruns".

114. Are not future operating costs of public projects frequently underestimated?

**Response:** There has been little systematic investigation of actual vs. projected operating costs for public projects. This is in part due to the fact that operating costs extend over a long time period. In contrast, capital costs of a given project are typically incurred over a shorter time frame, and much nearer to the time at which the estimate is made. In any event, we are not aware of a consistent pattern of operating cost underestimation.

For existing transit modes, the quantities of inputs needed to produce a unit of service are well-known and usually stable in a given setting over fairly long periods of time. However, operating costs involve both quantities and unit prices, and the prices are much more difficult to predict. Factors requiring future projections and influencing the future operating cost include:

- Input costs, for example, are subject to market forces and the outcome (in most cases) of labor negotiations. Fuel prices vary according to market forces and, in some cases, international conditions. Attempting to predict the level of those costs over a future period that may extend twenty years out is necessarily subject to a high range of variability.
- General inflation rates. In the absence of solid information on which to base unit prices a decade and more in the future, estimates stated in year-of-expenditure dollars are usually estimated by assuming a rate of inflation and applying that rate to current-year unit prices. If the actual inflation rates differ from the estimate, so will the future outlays.

For new transit modes with only prototypes in operation, less is known about the quantities of inputs that will be required to operate the services planned for the new mode. Contingencies are usually built into the estimates to allow for un-anticipated extra costs. The STREAM technology is in this category, with some unusual design aspects of both vehicles and power transmission system adding uncertainty to the operating cost estimating process.

In transit system operations, it is common to control operating costs by establishing an operating and maintenance budget for the coming year(s), then adjusting service to fit within the amount of funding expected to be available. If costs exceed estimates, the most basic way to balance the budget is to curtail service. This has happened in a number of transit agencies over time. As a result, services that were part of the service development plan involving a new mode may not have been produced, or produced in lesser quantities than originally programmed. This outcome usually reflects agency decisions based on the budget realities of the year, rather than anything intrinsically flawed in the operating cost estimating process.

115. Do not projections of future ridership turn out to be overestimates?

**Response:** Based on past projects, sometimes ridership estimates have been overestimated, sometimes underestimated, and sometimes matched with actual results.

116. Why does not the SDEIS offer a long-term projections in terms of ranges, such as high, low, probable?

**Response:** It is standard practice in the industry to present ridership forecasts as a single number since they are used for comparison purposes not as absolutes.

117. Why is not the difficulty of making future projections discussed in the Supplemental Draft EIS and qualifications offered as to the probable accuracy of such estimates?

**Response:** See response to comment #116.

118. And what happens if it turns out that the Supplemental Draft EIS has underestimated capital costs and operating costs and overestimated ridership?

**Response:** The operating and capital cost estimates and ridership forecasts were developed using acceptable industry standards.

119. Who assumes responsibility for the consequences of estimates that prove to be incorrect?

**Response:** The City is responsible for the Primary Corridor Transportation Project.

120. The lack of discussion of the City's current financial situation in the SDEIS, the absence of evidence that that situation has been taken into account in making cost projections, the doubtful nature of the SDEIS statements relating to tax increases, other proposed capital projects and state funding, and the absence of qualification of the estimates of long-term operating and capital costs and ridership projections make the Draft EIS a deficient and inadequate document, which should be rejected.

**Response:** Chapter 6 and Appendix E of the FEIS include the project financial analysis which take into account the City's current financial situation. The cost projections and ridership forecasts have all been prepared in accordance with best practices in the industry.

121. *Starting with the In-Town BRT?* The City Administration is proposing starting construction with the In-Town BRT rather than with the Regional BRT. The Regional BRT, however, together with local buses, will serve 5.5 times as many riders as the In-Town line (see Table 4.1-4, p. 4-5), will help people who currently have the longest and most time-consuming commutes and will result in a time-saving to the users of 17 minutes (Kapele) to downtown) as opposed to three minutes on the In-Town BRT (downtown to Waikiki). (See Table 4.1-5, p. 4-7.) Amazingly, the staging of BRT construction is not discussed in the Supplemental Draft EIS even though it is a critical element of placing the BRT in operation.

**Response:** The In-Town BRT is proposed to proceed ahead of the Regional BRT so that SDOOT widening of H-1 can be coordinated with the Regional BRT improvements.

122. *Informally, two rationales for proceeding with the In-Town BRT first have circulated. First, it is maintained, as we understand it, that it is important to start with the In-Town BRT first so that riders of the Regional BRT is constructed, there will be a transit system in-Town available to move the coming into town on the Regional BRT if it were to be constructed first. It is the Regional BRT that is going to serve the local resident and reduce his or her commute from Kapele to downtown by 17 minutes. The In-Town BRT will only serve that same rider three minutes going from downtown to Waikiki. (Ibid.)*

**Response:** The In-Town BRT is proposed to proceed ahead of the Regional BRT so that SDOOT widening of H-1 can be coordinated with the Regional BRT improvements.

123. *The second rationale that has been mentioned is that the State is said not to be ready to move on making the necessary modifications to the freeway system that are part of the proposed Regional BRT. This matter is not discussed in the Supplemental Draft EIS. It is certainly a matter deserving public discussion and close state-county coordination. There is a real danger, if the difficulties relating to the Regional BRT are not ironed out first, that the In-Town BRT serving 79,000 people (including tourists who constitute approximately 25% of those boarding or deboarding in Waikiki) and saving three minutes of travel time will be built and the Regional BRT serving 459,000 (including those served by local buses), almost all of whom are residents and saving those residents 17 minutes of travel time, will never be built.*

**Response:** The In-Town BRT will be a viable and valuable asset to transit riders even before the Regional BRT is in place. It will become even more valuable after the Regional BRT and In-Town BRT are interconnected.

124. *The phasing of construction and determining who will be served first and why are critical issues which should be addressed in the Supplemental Draft EIS. The fact that they are not addressed in the SDEIS makes the Draft a deficient and inadequate document, which should be rejected.*

**Response:** Chapter 2 of the SDEIS and FEIS include the project phasing plan.

125. *The Move From Private Automobiles to Public Transit. The Supplemental Draft EIS assumes, and rightly so, that it is important to make mass transit more comfortable and swifter if more people are to be attracted to ride public transit. It further asserts that, "The delay to motorists is expected to accelerate a switch in travel behavior from automobiles to transit." (See S.6.3, p. S-23.) This is a critical assumption, namely that by taking vehicle lanes for exclusive or semi-exclusive use by public transit vehicles, and thus increasing congestion for automobile drivers, that a significant portion of those drivers will willingly, or perhaps unwillingly, shift to public transit. The*

*Supplemental Draft EIS cites no evidence or research data from other major American metropolitan areas which have installed exclusive or semi-exclusive lanes to support this assertion or to indicate whether such switches are made willingly or unwillingly. Is the City Administration actually proposing that we pursue a particular course of action impacting the way in which people behave without knowing what the new behavior patterns will be?*

**Response:** The FEIS corrects this statement so that it is clear that it is not the conversion of lanes that will create the congestion, the congestion for motorists will be there without the BRT. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

There is clear evidence from numerous cities that have implemented enhanced transit systems that a significant number of people will divert from autos to transit when the system provides sufficient time savings and/or reliability. The amount of diversion from autos needed in the primary corridor to realize the ridership forecasts is less than 2 percent.

126. *The failure of the Supplemental Draft EIS to address fully a fundamental premise underlying the proposed BRT, namely, whether or not eliminating traffic lanes for motor vehicles will result in people shifting their travel trips from private automobiles to public transit, whether willingly or unwillingly, makes the Draft a deficient and inadequate document, which should be rejected.*

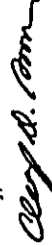
**Response:** The SDEIS and FEIS in Chapter 4 fully discuss the consequences of converting some lanes to give priority use to transit.

127. *In conclusion, we strongly favor improved public mass transit for Oahu residents. We believe, however, that the questions we and others have raised and are raising need to be resolved, and not just swept under the table, before proceeding with implementation of the first phase of the BRT.*

**Response:** Comment noted. The questions raised have been answered in the FEIS.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

THE ESTATE OF JAMES CAMPBELL

September 25, 2000

The Honorable Duke Bainum, Chair  
and Members of the Transportation Committee  
City and County of Honolulu  
530 S. King Street  
Honolulu, HI 96813

Dear Chair Bainum and Committee Members:

Primary Corridor Transportation Project

I am, Henry Eng, Community Development Manager for The Estate of James Campbell. We speak in support of the Bus Rapid Transit alternative of the Primary Corridor Environmental Impact Statement.

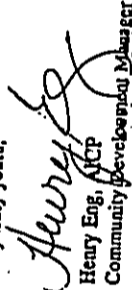
Clearly, the no-build alternative provides inadequate improvements to accommodate planned growth. The Transportation System Management (TSM) alternative, calling for the development of the Hub-and-Spoke System, has been implemented and is working quite well under the present situation. We like its features which provide good linkages between Leeward Oahu, Kapolei and Honolulu. It provides better, faster and more convenient access.

The Bus Rapid Transit (BRT) alternative appears to be a cost-effective way to improve on the TSM features. We do have a few comments with respect to the BRT:

- While improvements are needed to ease congestion to and from Honolulu, job growth in Kapolei also needs to be served. We want to be sure that full consideration is given to maintaining adequate access to and from Kapolei. This is necessary to support approved land use policy, which envisions the development of Kapolei as a job center.
- We also believe that the BRT program should be fully coordinated with the ongoing Ewa Area Regional Transportation Plan (EARTP), which is being developed to address needed road improvements. The implementation of the BRT should not be permitted to negatively impact funding programs for the EARTP since both are needed.

Thank you for the opportunity to present our views.

Very truly yours,

  
Henry Eng, AICP  
Community Development Manager

ms:01002000K19839

The Estate of James Campbell and Kapolei, Hawaii 96707 Phone: (808) 624-4473 Fax: (808) 624-4473 Website: www.kapolei.com

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE YEOON, MATAMOTO  
DEPUTY DIRECTOR

November 13, 2002

Mr. Henry Eng, AICP  
Community Development Manager  
The Estate of James Campbell  
1001 Kamaoia Boulevard  
Kapolei, Hawaii 96707

Dear Mr. Eng:

Subject: Primary Corridor Transportation Project

This is in response to your September 25, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/OEIS). Your support of the In-Town Bus Rapid Transit (BRT) as the Locally Preferred Alternative (LPA) at the November 14, 2000 Special Transportation Committee Meeting has been duly noted.

1. We speak in support of the Bus Rapid Transit Alternative of the Primary Corridor Environmental Impact Statement.

Response: Comment noted. It is a statement of the commenter's preference for an LPA. While improvements are needed to ease congestion to and from Honolulu, job growth in Kapolei also needs to be served. We want to be sure that full consideration is given to maintaining adequate access to and from Kapolei. This is necessary to support approved land use policy, which envisions the development of Kapolei as a job center.

Response: The Refined LPA includes the Regional BRT system that consists of a new transit center supported by additional local and express bus routes in Kapolei.

3. We also believe that the BRT program should be fully coordinated with the ongoing Ewa Area Regional Transportation Plan (EARTP), which is being developed to address needed road improvements. The implementation of the BRT should not be permitted to negatively impact funding programs for the EARTP since both are needed.

Response: The In-Town and Regional BRT components of the Primary Corridor Transportation Project are included in the most recent update to the Oahu regional transportation plan (TOP 2025). The TOP 2025 also includes Ewa transportation projects, such as Kapolei Interchange and North South Road and Interchange. Funding programs for these and other Ewa transportation projects will not be affected by the Primary Corridor Transportation Project.

Mr. Henry Eng  
Page 2  
November 13, 2002

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6376. We appreciate your interest in the project.



November 1, 2000

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
711 Kapiolani Blvd., Suite 1200  
Honolulu, HI 96813

Sincerely,

CHERYL D. SOON  
Director

Dear Ms. Soon:

Subject: Primary Corridor Transportation Project

We offer these comments on the MIS/DEIS for the Primary Corridor Transportation Project in addition to our comments provided to you in our September 18, 2000 letter. Please note that electrical reliability is a key component to any transportation option that you may choose for your Primary Corridor Transportation Project, in terms of continuous operation of traffic signals along, and supplemental to the selected transit route.

Electrical reliability in the Downtown/University/Waikiki areas will be especially crucial to the successful operation of a Bus Rapid Transit system utilizing the "embedded plate systems" technology.

To that end, the Kamoku-Pukele 138kV transmission line project is vital to maintain electrical reliability to support transportation and other infrastructure needs in the Primary Urban Center.

Thank you for the opportunity to comment on this MIS/DEIS.

Sincerely,

Ken T. Morikami, Director  
Project Management Division

cc: Office of Environmental Quality Control  
Robert Bramen, Project Manager, Parsons Brinckerhoff Quade and Douglas, Inc.

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
600 SOUTH KING STREET, 2ND FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 533-4338 • Fax: (808) 533-4720 • Website: www.cc.honolulu.hi



JEREMY HARRIS  
MANAGER

CHERYL D. SOON  
DIRECTOR

GEORGE WEDOKI MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD1100-05353R

Mr. Ken T. Morikami, Director  
Project Management Division  
Hawaiian Electric Company, Inc.  
P. O. Box 2750  
Honolulu, Hawaii 96840-0001

September 18, 2000



SCOTT W.H. SOON, P.E.  
Manager  
Environmental Department

City and County of Honolulu  
Department of Transportation Services  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, HI 96813

Attention: Ms. Cheryl D. Soon

Subject: Primary Corridor Transportation Project

Thank you for the opportunity to comment on your August 2000 DEIS for the Primary Corridor Transportation Project. We have reviewed the subject document and have no comments at this time. However, HECO would like to be informed if the electric bus version of the BRT alternative is selected. At that time HECO will need additional information on the load requirements and points of service delivery.

HECO shall reserve further comments pertaining to the protection of existing powerlines bordering the project area until construction plans are finalized. Again, thank you for the opportunity to comment on this DEIS.

Sincerely,

cc: OEQC

Parsons Brinkerhoff Quade and Douglas, Inc.

Subject: Primary Corridor Transportation Project

This is in response to your November 1, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. Please note that electrical reliability is a key component to any transportation option that you may choose for your Primary Corridor Transportation Project, in terms of continuous operation of traffic signals along, and supplemental to the selected transit route.

Response: Comment noted.

2. Electrical reliability in the Downtown/University/Waikiki areas will be especially crucial to the successful operation of a Bus Rapid Transit system utilizing the "embedded plate systems" technology.

Response: Comment noted.

3. To that end, the Kamoku-Pukele 138KV transmission line project is vital to maintain electrical reliability to support transportation and other infrastructure needs in the Primary Urban Center.

Response: The DTS appreciates HECO's position on the importance of the Kamoku-Pukele 138KV transmission line project. However, we fail to see how this project and the Primary Corridor Transportation Project are related.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director



Hawaiian Electric Company, Inc. • PO Box 2750 • Honolulu, HI 96840-0001

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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CHERYL D. SOON  
DIRECTOR  
GEORGE NISHIO MIYAMOTO  
DEPUTY DIRECTOR

TPDS/00-04571R

November 13, 2002



William A. Bonnet  
Vice President  
Government and Community Affairs

April 8, 2002

Mr. Scott W.H. Seu, P.E.  
Manager  
Environmental Department  
Hawaiian Electric Company, Inc.  
P. O. Box 2750  
Honolulu, Hawaii 96840-0001

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
650 S. King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Dear Mr. Seu:

Dear Ms. Soon:

Subject: Primary Corridor Transportation Project

This letter is in reference to the Primary Corridor Transportation Project Supplemental Draft Environmental Impact Statement.

This is in response to your September 18, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. We have reviewed the subject document and have no comments at this time.
2. However, HECO would like to be informed if the electric bus version of the BRT alternative is selected. At that time HECO will need additional information on the load requirements and points of service delivery.

Energy Consumption:

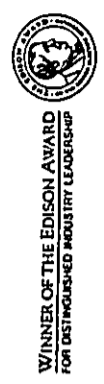
The SDEIS notes in Section 5.9.2 that the in-town BRT may utilize an electric vehicle system, and an all-electric in-town BRT system would require approximately 11,580 kilowatts per day, which can be provided within the reserve capacity of existing electric power plants according to the Hawaiian Electric Company. HECO encourages the use of energy efficient, environmentally sensitive transportation as evidenced by our involvement in many of the state's advanced technology projects.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

BRT Operation:

The in-town BRT University line is proposed to operate near several of our major employment sites. The transit stops located near Iolani Palace, Alapai Street and Thomas Square, in particular, will be convenient for our many employees downtown and at Ward Avenue, should they choose public transportation for their commute.

Sincerely,  
  
CHERYL D. SOON  
Director



Ms. Cheryl D. Soon, Director  
April 8, 2002  
Page 2

As one of the State's largest employers, we welcome new transportation initiatives to improve island wide mobility for our employees as well as the general public, particularly those that are energy efficient and environmentally friendly. Please keep us informed as you proceed with your planning and coordination.

Sincerely,



DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
630 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 522-4529 • Fax: (808) 522-4700 • Internet: www.co.honolulu.hi.us



JERRY HARRIS  
Mayor

CHERYL D. SOON  
DIRECTOR  
GEORGE KOSORIYAMAOTO  
SENIOR DIRECTOR

November 13, 2002

TPD4102-01463R

Mr. William A. Bonnet, Vice President  
Government and Community Affairs  
Hawaiian Electric Company, Inc.  
P. O. Box 27750  
Honolulu, Hawaii 96840-0001

Dear Mr. Bonnet:

Subject: Primary Corridor Transportation Project

This is in response to your April 8, 2002 letter regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. The SDEIS notes in Section 5.9.2 that the in-town BRT may utilize an electric vehicle system, and an all-electric in-town BRT system would require approximately 11,500 kilowatts per day, which can be provided within the reserve capacity of existing electric power plants according to the Hawaiian Electric Company. HECO encourages the use of energy efficient, environmentally sensitive transportation as evidenced by our involvement in many of the state's advanced technology projects.

Response: We appreciate your support of the project and vehicle technology options being considered.

2. The in-town BRT University line is proposed to operate near several of our major employment sites. The transit stops located near Iolani Palace, Alapai Streets and Thomas Square, in particular, will be convenient for our many employees downtown and at Ward Avenue, should they choose public transportation for their commute.

Response: Serving Honolulu's residents and employees by increasing the people-carrying capacity of the transportation system in the primary transportation corridor is a primary project purpose.


3. As one of the State's largest employers, we welcome new transportation initiatives to improve island wide mobility for our employees as well as the general public, particularly those that are energy efficient and environmentally friendly. Please keep us informed as you proceed with your planning and coordination.

Response: You will be kept informed as the project progresses.

Mr. William A. Bonnet  
Page 2  
November 13, 2002

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOOM  
Director



Peter H. Schall  
Vice President & Managing Director

October 5, 2000

Duke Balaam, Chair  
Transportation Committee  
Honolulu City Council  
330 South King St.  
Honolulu, HI 96813

RE: City Council Hearing - Primary Corridor Transportation Project  
Hawaii Convention Center, Room 318B  
Thursday, October 5, 2000

Chair Balaam, Vice Chair Mamba, and members of the Transportation Committee:

My name is Peter Schall, and I am the Managing Director of the Hilton Hawaiian Village. I would like to submit this letter of comment on the City's transit plan for Honolulu.

The Hilton Hawaiian Village applauds the City's efforts to pursue the implementation of improved transportation systems. We know that Honolulu needs environmentally responsible transportation methods, operating with good frequency to create efficiencies in the city bus system, commuter traffic, and in-town vehicular traffic.

Of the three alternatives examined in the Major Investment Study/Environmental Impact Statement, we favor the Bus Rapid Transit or BRT alternative. From the materials that have been presented thus far, we understand that this alternative will have some impact by reducing the number of normal vehicular traffic lanes in certain areas. We would hope that the final study and the results of the EIS will demonstrate that public and private vehicular traffic will be sufficiently reduced by this alternative transportation system to allow for the lane reductions.

We support all efforts to improve the resident and visitor experience in Waikiki. We believe this alternate transportation system has the possibility to do that, and will provide significant improvements in the transportation system island-wide as well.

Thank you for your consideration of our comments.

Sincerely,



Peter H. Schall

2003 Kalia Road, Honolulu, HI 96815-1999  
Tel: +1 808 919 4331  
Reservations: www.hilton.com or 1-800-HILTONS





November 14, 2000  
 Duke Bainum, Chair  
 Transportation Committee  
 Honolulu City Council  
 530 South King St  
 Honolulu, HI 96813

Peter H. Schall  
 Vice President & Managing Director

JEREMY HARRIS  
 MAYOR

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
 430 SOUTH KING STREET, 3RD FLOOR  
 HONOLULU, HAWAII 96813  
 Phone: (808) 533-4328 • Fax: (808) 533-4730 • Internet: www.cd.honolulu.hawaii.gov



CHERYL D. SOON  
 DIRECTOR  
 GEORGE YECORU MATAMOTO  
 DEPUTY DIRECTOR

November 13, 2002

RE: Resolution 00-249  
 Selection of a locally preferred alternative for the Primary Corridor  
 Transportation Project  
 10:00 AM Tuesday, November 14, 2000

Chair Bainum, Vice Chair Mansho, and members of the Transportation Committee:  
 My name is Peter Schall, and I am the Managing Director of the Hilton Hawaiian Village. I would like to submit this letter of comment on the City's transit plan for Honolulu.

The Hilton Hawaiian Village applauds the City's efforts to pursue the implementation of improved transportation systems. We know that Honolulu needs environmentally responsible transportation methods, operating with good frequency to create efficiencies in the city bus system, commuter traffic, and in-town vehicular traffic.

Of the three alternatives examined in the Major Investment Study/Environmental Impact Statement, we favor the Bus Rapid Transit or BRT alternative. From the materials that have been presented thus far, we understand that this alternative will have some impact by reducing the number of normal vehicular traffic lanes in certain areas. We would hope that the final study and the results of the EIS will demonstrate that public and private vehicular traffic will be sufficiently reduced by this alternative transportation system to allow for the lane reductions.

We support all efforts to improve the resident and visitor experience in Waikiki. We believe this alternate transportation system has the possibility to do that, and will provide significant improvements in the transportation system island-wide as well. We look forward to the opportunity to provide more input as the Transportation Project develops.

Thank you for your consideration of our comments.

Sincerely,

Peter H. Schall

2005 Kalia Road, Honolulu, HI 96815-1999  
 Tel: +1 808 519 4321  
 Reservations: www.hilton.com or 1-800-HILTONS

Mr. Peter H. Schall  
 Vice President & Marketing Director  
 Hilton Hawaiian Village  
 2005 Kalia Road  
 Honolulu, Hawaii 96815-1999

Dear Mr. Schall:

Subject: Primary Corridor Transportation Project

This is in response to your October 5 and November 14, 2000 letters regarding your comment on the Major Investment Study/Draft Environmental Impact Statement (MIS/DIEIS). Your letters, which were identical in content, provided us with the following comment:

*Of the three alternatives in the Major Investment Study/Environmental Impact Statement, we favor the Bus Rapid Transit or BRT Alternative. From the materials that have been presented thus far, we understand that this alternative will have some impact by reducing the number of normal vehicular traffic lanes in certain areas. We would hope that the final study and the results of the EIS will demonstrate that public and private vehicular traffic will be sufficiently reduced by this alternative transportation system to allow for the lane reductions.*

Response: Comment noted. Your comment is a statement of a preference for a Locally Preferred Alternative.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
 Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE 'KEONI' MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

Mr. John Jacobson  
Operations Analyst  
Hilton Hawaiian Village  
2005 Kalia Road  
Honolulu, Hawaii 96815-1999

Dear Mr. Jacobson:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the October 5, 2000 Special Transportation Committee Meeting and at the November 14, 2000 Special Transportation Committee Meeting regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS). Your testimonials, which were identical in content, provided us with the following comment:

*The Hilton Hawaiian Village is in support of, in particular, the City's efforts to look for a viable alternative that is environment friendly and provides a solution that suits the community. And as such, of the three alternatives, we prefer the BRT.*

Response: Comment noted. Your comment is a statement of the preference for a Locally Preferred Alternative.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE 'KEONI' MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

Mr. Richard Yamasaki, President  
IND-COM Management  
681 South King Street, Suite 204  
Honolulu, Hawaii 96813

Dear Mr. Yamasaki:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the October 19, 2000 Special Transportation Committee Meeting regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. We are all very concerned about the proposed bus hub primarily for the following reasons: That many of our people have mentioned tonight already - noise pollution, sound pollution and also tremendous traffic congestions which will be added because of the proposed hub.

Response: This comment is referring to the proposed transit center at Kamehameha Drive-In. The Kamehameha Drive-In has been eliminated from consideration as a transit center site.

2. I'm in favor of improving the traffic in our area. However, we feel that this would have a negative effect because where it might affect and improve some of the traffic in some of the areas, it would greatly add to the traffic congestion in the Peairidge area.

Response: The transit center site at Kamehameha Drive-In and the on/off-ramp between Kaonohi Street and H-1 have been eliminated from consideration.

3. Also mentioned that it's not only during the holiday seasons but also on the weekends whenever there is sales I guess going on in Peairidge this traffic very, very heavy.

Response: The transit center site at Kamehameha Drive-In and the on/off-ramp between Kaonohi Street and H-1 have been eliminated from consideration.

4. As the gentleman mentioned about the buses. How are we going to get the buses on a left-turn? You can't get out of Peairidge already in many instances. This hub may pose a greater problem to this area. While relieving pressure for some other areas, our concern is for this particular area.

Response: The transit center site at Kamehameha Drive-In and the on/off-ramp between Kaonohi Street and H-1 have been eliminated from consideration.

Mr. Richard Yamasaki  
Page 2  
November 13, 2002

5. So, we don't know all the factors involved because we don't know how many buses are going to be coming in. Must certainly address those concerns because you may be helping someone else. You know the lives of these other people will be impacted.

**Response:** The transit center site at Kamahele Drive-In and the on/off-ramp between Kaomohi Street and H-1 have been eliminated from consideration.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

**BOBBIE JENNINGS'**  
**SPORTS NETWORK**  
*Specialists in Development,  
Sponsorship, Promotion*

- Event Sponsorship
- TV and Radio Sports Reports
- Video Production
- Photography • Journalism
- Event Media Coordination

Oct. 3, 2000

**TO:** Duke Balnum  
Chair, Committee on Transportation  
City Council

**FROM:** Bobbie Jennings  
Resident, Ala Moana  
946-8661

**RE:** Testimony for the Thursday, October 5 meeting at the  
Hawaii Convention Center to review the transit  
proposal

At the two recent community meetings requests were made for more information on the first two options, the No-Build and Transportation System Management, in order that these presentations were more balanced. This was not done, leaving only one conclusion: that there are no options for the public to consider. Bus Rapid Transit is going to be implemented.

Since the presentations leave no room for change, I feel attending yet another one would not benefit either one of us. I wish this was not so.

*Bobbie Jennings*

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU  
650 SOUTH KING STREET, 2ND FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 522-4329 • Fax: (808) 522-4720 • Internet: www.cc.honolulu.hi.us

JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE "KEONI" MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

Ms. Bobbie Jennings  
Bobbie Jennings' Sports Network  
419A Alkison Drive  
Honolulu, Hawaii 96814

Dear Ms. Jennings:

Subject: Primary Corridor Transportation Project

This is in response to your October 3, 2000 letter regarding comment on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

*At the two recent community meetings requests were made for more information on the first two options, the No-Build and Transportation System Management, in order that these presentations were more balanced. This was not done, leaving only one conclusion: That there are no options for the public to consider. Bus Rapid Transit is going to be implemented.*

**Response:** While it is your view that the presentation of the alternatives at the two meetings you attended may have been unbalanced, the alternatives are treated in a balanced manner in the MIS/DEIS.

It is a federal requirement that all alternatives be treated in a balanced manner and the MIS/DEIS and Final Environmental Impact Statement (FEIS) have been reviewed to ensure that this "balanced treatment" requirement is met. A complete description and comparison of the No-Build Alternative, Transportation System Management (TSM) Alternative, and Bus Rapid Transit (BRT) Alternatives are discussed in the MIS/DEIS and FEIS, Chapters 2 - Alternatives Description and 7 - Comparison of Alternatives.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU  
650 SOUTH KING STREET, 2ND FLOOR  
HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE "KEONI" MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

Mr. Ken Stanley  
Vice President  
Operational Planning and Marketing  
Oahu Transit Services, Inc.  
811 Middle Street  
Honolulu, Hawaii 96819

Dear Mr. Stanley:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the Public Hearing on April 20, 2002 regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. *I'm vice president of Operational Planning and Marketing for Oahu Transit Services. We operate The Bus for the City and County. I worked in the transit industry for over 34 years, with extensive experience in daily transit operations in Oregon, Washington state, California and Hawaii. For six years, I chaired the Bus Transit Systems Committee for the National Academy of Sciences Transportation Research Board. In addition, I have had the opportunity to visit and learn about bus rapid transit system firsthand in several major international cities. This is what I've learned. One bus can take as many as 40 automobiles off the road. This makes room on the freeway for others and reduces the demand for parking in major destinations. For example, from Central and Leeward areas, the bus operates approximately 145 trips to Downtown and Waikiki every weekday between 6:30 and 7:30 a.m. These buses carry approximately 7,250 passengers. If all these people were in automobiles instead of on the buses, with the same number of people average per car as currently use the cars, this would add almost 6,000 cars to the freeway during that one hour - and Kaim Highway - the freeway and Kaim Highway during that one hour alone.*

**Response:** This comment is consistent with the Final Environmental Impact Statement (FEIS) findings.

2. *And that's not all. When those 6,000 cars get to where they're going, they require 6,000 additional parking spaces. The people on the bus are helping the people in their cars.*

**Response:** We appreciate your insight into Honolulu's transportation issues.

3. *Improving the transit system by introducing BRT will attract more people to transit and improve mobility for everyone, whether you're on the bus or on the road.*

**Response:** DTS concurs with this response.

Mr. Kent Stanley  
Page 2  
November 13, 2002

4. BRT can help make Honolulu a better place to live. Such diverse cities as Ottawa, Canada, and Porto Alegre, Brazil, have successfully used BRT to improve mobility for residents and focus growth in a manageable way. While at the same time, they have been able to reduce the overdependency on the automobile. This is a measurable outcome when the system is well planned and executed.


**Response:** This comment is consistent with the FEIS findings.

5. OTS staff has participated in all of the BRT Working Groups, including the ones that have reviewed their line sections covered by the SDEIS. We have made suggestions on operational issues that have been incorporated into this project. We feel that BRT is an important element in the City's long-term transportation plan for the island of Oahu, and we will continue to work closely with the City to make it as efficient and effective as possible.

**Response:** DTS appreciates your participation in the working groups and your assistance with the project's operational issues.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

  
CHERYL D. SOON  
Director



November 14, 2000

Eric J. Masutomi  
Director of Planning  
Outrigger Properties  
Direct line: (808) 521-6557

The Honorable Duke Baimum, Chair  
Transportation Committee  
City Council  
City and County of Honolulu  
Honolulu Hale  
Honolulu, Hawaii 96813

Re: Resolution 00-249 - Relating to the Support of a Fully Integrated Mass Transit System and to the Selection of a Locally Preferred Alternative for the Primary Corridor Transportation Project

Chair Baimum and Members of the Committee:

Outrigger Enterprises, Inc. supports the intent and purpose of this resolution to approve the selection of the Bus Rapid Transit Alternative as the preferred transportation option, and to proceed with the next phase of planning and engineering for a fully integrated mass transit system for Oahu.

While we are, of course, interested in the efficacy of the overall, island-wide system, our concern naturally focuses on Waikiki segment of the proposed system. As the largest hotel operating company in Waikiki, we have a vital obligation to ensure that any transportation option that is pursued, does indeed serve the best interests of our guests, employees, our business, and Waikiki in general. As such, the Outrigger organization has been an active participant in the City's Trans 2K planning process. It is in this context, that we endorse, in concept, the high-capacity BRT system proposed for Waikiki.

We are well aware that a number of questions remain to be answered, particularly the manner in which a dedicated traffic lane might impact traffic flow into and from our hotels, as well as general delivery and guest transportation services in the district. We do, however, remain confident that these specific issues and concerns can and will be appropriately addressed and resolved as we proceed with the preliminary engineering stage of the project.

Sincerely,

  
Eric J. Masutomi

EJM:lh

Outrigger Enterprises, Inc. • Director of Planning • Eric J. Masutomi • 1000 Ala Moana Blvd., Suite 1400 • Honolulu, HI 96813 • Telephone: (808) 521-6557 • Fax: (808) 521-6558

**PRIMARY CORRIDOR TRANSPORTATION PROJECT**  
Island of Oahu, Hawaii  
**SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT (SDEIS)**

The information you provide on this form will help the City & County of Honolulu and the Federal Transit Administration in the future planning of the Primary Corridor Transportation Project. We appreciate any comment you may have. Comments must be postmarked or received by May 7, 2002.

Name: REG WHITE  
Representing: PARADISE CRUISE LTD  
Address: 1540 SOUTH KING ST  
Honolulu HI 96814

Please make any comments below:

Attached

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
610 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 521-5259 • Fax: (808) 523-4750 • Website: www.cc.honolulu.hi.us



JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE WECHELE, LAYMANUOTO  
DEPUTY DIRECTOR

November 13, 2002

Mr. Eric J. Masutomi  
Director of Planning  
Outrigger Properties  
Outrigger Enterprises, Inc.  
2375 Kūho Avenue  
Honolulu, Hawaii 96815-2882

Dear Mr. Masutomi:

Subject: Primary Corridor Transportation Project

This is in response to your November 14, 2000 letter and your testimony at the November 14, 2000 Special Transportation Committee Meeting regarding your comment on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

Outrigger Enterprises, Inc. supports the intent and purpose of this resolution to approve the selection of the Bus Rapid Transit Alternative as the preferred transportation option, and to proceed with the next phase of planning and engineering for a fully integrated mass transit system for Oahu.

Response: Comment noted. Your comment is a statement of the preference for an LPA.  
We appreciate your interest in the project.

Sincerely,  
  
CHERYL D. SOON  
Director

PARADISE CRUISE, LTD.

April 10, 2002

TESTIMONY REGARDING THE BRT SYSTEM AS PROPOSED

My name is Reg White. I am vice president, operations, for Paradise Cruise, Ltd. Paradise Cruise, Ltd. carries approximately 550,000 visitors per year aboard its three boats operating in the excursion and dinner cruise trade along the south shore of Oahu. We are an attraction. That is, we provide leisure time activities to occupy the free time of the visitors who fill our hotels. Needless to say, when you purchase a ticket for a "sunset cruise", some of the thrill is lost when the sun actually sets while you are waiting patiently on a bus stuck in heavily marked traffic rather than aboard your anticipated "cruise". Therefore, we, as a business, are very sensitive to anything that will make the transportation of our visitors to our various island attractions less pleasant, more difficult or less dependable.

More than 90% of the people on Oahu don't ever ride the bus.  
This plan's "best possible scenario" predictions call for less than a 10% of population ridership.

Of this 90% who don't ride the bus, each man, woman and child, each of them, pays \$100.00 per year to support the operating deficit of "The Bus" that they never ride. How much will this new system cost each of them??

How can you allow "The Bus", which serves less than 10% of the residents of Oahu, to impede the passage of the other 90% of the residents of Oahu in their daily transit needs?

Here is where you should spend our money: Building pullouts for each and every bus stop along our roads and streets so that "The Bus" doesn't block lane one, and the people trying desperately to get out from behind the stopped bus don't foul the traffic in lane two each and every time "The Bus" makes a stop along the curb.

Why can't you see that the true need for better rapid transit is to bring working people in from the outlying areas of the island, not to foul up the present lanes of our city streets in town.

This is where we need to have our money spent, bringing people in from places like Waianae, Nimitz, Ewa, Waikiki, Makakilo, Kalaheo, Hanalei and Kaneohe. These are the people we need in efficiently bringing to town and get back to town each day. Not make a raceway for the people who are already in town so they can go around in circles faster while the other 90% of us sit, stuck in hopelessly marked traffic caused by this BRT for the privileged 10%.

Of course cars need to be taken that even these very necessary routes coming in from the outlying areas don't impede the present flow of traffic on our already crowded roads.

1110 South Bay Street - Honolulu, Hawaii 96814-1818 - Phone: (808) 941-7700 - Fax: (808) 941-7700  
E-mail: reg@paradisecruise.com

Access roads and additional special service lanes would have to be constructed to accommodate this additional flow of commuters, not the proposed re-dedication of existing lanes.

This is where the money should be spent and where the effort should be made, not down here in town. What we really need are bus stop pullouts and synchronized traffic signals so the traffic we already have can flow smoothly. Just the bus stop pullouts alone would be the equivalent of gaining at least 1.5 additional lanes of traffic in each direction! Why not consider closed contraflow lanes in town that follow rush hours, much as we do on Kapolei each day at present? This moves everyone, not just "The Bus"!

Anyone who drives our roads and streets at very late hours can attest that even at these hours of no traffic at all, our traffic signals impede rather than accommodate traffic flow.

This is not rocket science! For over 50 years they have been very successfully synchronizing signals in America. For the 90% of us who don't ride "The Bus", and for the less than 10% who do as well, please spend the funds to synchronize our traffic signals on Oahu! This will make all of the traffic flow more smoothly and rapidly to its destination, both for those in "The Bus" and the other 90% of us who will forever stay in our cars.

Anything that fouds up the passage of traffic makes the cost of living in Hawaii go up. Time is money, and each and every item that we need in our daily lives has to travel over our roads and streets to get to us. The longer the transit time takes to make a delivery, the more our goods have to cost to pay for this wasted time in transit!

Until you have accomplished all of the above measures to help traffic to flow more smoothly and rapidly on Oahu, don't even think of starting to build a BRT system in town. You owe this to the majority! You have no right to foul up more than 90% of us just to accommodate less than 10% of us!

For Paradise Cruise, Ltd.

Reg White  
Vice president, operations

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTHWING STREET, 2ND FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 522-4329 • Fax: (808) 522-4726 • Website: www.cc.honolulu.hi.us

JEREMY HARRIS  
MAYOR



CHESTER D. SOON  
DIRECTOR  
GEORGE "KEO" MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

Mr. Reg White  
Vice President of Operations  
Paradise Cruise, Ltd.  
1540 South King Street  
Honolulu, Hawaii 96826-1919

Dear Mr. White:

Subject: Primary Corridor Transportation Project

This is in response to your April 10, 2002 letter regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. *More than 90% of the people on Oahu don't ever ride the bus. This plan's "best possible scenario" predications call for less than a 10% of population ridership.*  
*Of this 90% who don't ride the bus, each man, woman and child, each of them pays \$100.00 per year to support the operating deficit of "TheBus" that they never ride. How much will this new system cost each of them??*

**Response:** Transit systems throughout the nation are subsidized. The reasons for doing so include the recognition that many members of the community are either too young, too old, too poor, or are physically unable to drive a car, and are therefore dependent on public transportation for their mobility. Additionally, it is viewed as more cost effective to spend public funds subsidizing transit than on building new or widened roads to accommodate these same people in automobiles.

The annual per capita subsidy will vary slightly from year to year as the Refined LPA is implemented, but in current dollars (i.e. without the effects of inflation) the subsidy will be about the same as today. This is because the system will grow in direct proportion to the growth in population.

2. *How can you allow "TheBus", which serves less than 10% of the residents of Oahu, to impede the passage of the other 90% of the residents of Oahu with their daily transit needs?*

**Here is where you should spend our money:** Building pullouts for each and every bus stop along our roads and streets so that "TheBus" doesn't block lanes open, and the people trying desperately to get out from behind the stopped bus don't foul the traffic in lanes they each and every time "TheBus" makes a stop along the curb.

Mr. Reg White  
Page 2  
November 13, 2002

**Response:** Many approaches have been taken to offset the overlay of a BRT system in the urban core. These include adding lanes (such as along Ala Moana Boulevard and Kalia Road in Waikiki); removing on-street parking so as to add lanes (such as on University Avenue and on Pensacola Street); and installing bus turnouts (such as proposed along sections of Dillingham Boulevard and Kuliou Avenue).

3. *Why can't you see that the true need for better rapid transit is to bring working people in from the outlying areas of the island, not to foul up the present lanes of our city streets in town. This is where we need to have our money spent, bringing people in from places like Waiānāe, Mānākūlī, Ewa, Waikēle, Makakōlo, Kāhuku, Hānuia and Kaneohe. These are the people we need to efficiently bring to town and get back home each day. Not make a raceway for the people who are already in town so they can go around in circles faster while the other 90% of us sit, stuck in hopelessly snarled traffic caused by this BRT for the privileged 10%.*

**Response:** As part of the Regional BRT, zipper lane and ramp improvements are proposed along the H-1 and H-2 corridors to speed up travel for bus riders in these corridors. The continuation of their trips however require priority treatments be made to selected streets in-town as well so that the gains achieved getting to Middle Street are also achieved in the in-town portion of their journey.

4. *Of course care needs to be taken that even these very necessary routes coming in from the outlying areas don't impede the present flow of traffic on our already crowded roads.*

**Response:** The FEIS Chapter 4 presents the traffic and transportation effects associated with implementing the Refined LPA.

5. *Access roads and additional special service lanes would have to be constructed to accommodate this additional flow of commuters, not the proposed rededication of existing lanes.*

**Response:** There are limited places in the highly built-up primary corridor where new roadway construction is possible. Taken together they could not be considered a substitute for the improvements that make up the Refined LPA.

6. *This is where the money should be spent and where the effort should be made, not down here in town. What we really need are bus stop pullouts and synchronized traffic signals so the traffic we already have can flow smoothly. Just the bus stop pullouts alone would be the equivalent of gaining at least 1.5 additional lanes of traffic in each direction!*

**Response:** There are a very limited number of places where there is sufficient room to add bus turnouts in the urban core. Even if it were possible, bus turnouts do nothing to speed up bus operations. In congested areas buses get trapped in the turnouts and have to wait for a gap in traffic to pull out. This would not be conducive to making transit more attractive.

7. *Why not consider coned contraflow lanes in town that follow rush hours, much as we do on Kapolei each day at present? This moves everyone, not just "TheBus".*

**Response:** SOOT is considering an A.M. peak contra-flow lane along Nimitz Highway from the Keahi Interchange to Pacific Street.



Mr. Reg White  
Page 3  
November 13, 2002

8. *Anyone who drives our roads and streets at very late hours can attest that even at these hours of no traffic at all, our traffic signals impede rather than accommodate traffic flow. This is not rocket science! For over 50 years they have been very successfully synchronizing signals in America. For the 90% of us who don't ride "TheBus", and for the less than 10% who do as well, please spend the funds to synchronize our traffic signals on Oahu! This will make all of the traffic flow more smoothly and rapidly to its destination, both for those in "TheBus" and the other 90% of us who will forever stay in our cars.*

**Response:** The City has a state of the art traffic management center. It also has an ongoing traffic signal optimization program. Given the large number of traffic signals in Honolulu, it will take time to optimize all of the signals, but the process has been initiated and the public will see the benefits of the program in the near future.

9. *Anything that fouts up the passage of traffic makes the cost of living in Hawaii go up. Time is money, and each and every item that we need in our daily lives has to travel over our roads and streets to get to us. The longer the transit time takes to make a delivery, the more our goods have to cost to pay for this wasted time in transit!*

**Response:** As pointed out in Chapter 4 of the FEIS, it is not the conversion of lanes that will create congestion. The congestion for motorists (including truck drivers) will be there without the BRT. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

10. *Until you have accomplished all of the above measures to help traffic to flow more smoothly and rapidly on Oahu, don't even think of starting to build a BRT system in town. You owe this to the majority! You have no right to foud up more than 90% of us just to accommodate less than 10% of us!*

**Response:** Comment noted.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-8976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director



# PASSPORT RAILROAD

06 November 2000

CITY & COUNTY OF HONOLULU  
Department of Transportation Services  
711 Kapihueloa Boulevard, Suite 1200  
Honolulu HI 96813

Dear Ladies and Gentlemen:

This introductory letter and subsequent detailed comments are submitted in response to the pending Major Investment Study/Draft Environmental Impact Statement ("MIS/DEIS") - Primary Corridor Project sponsored by the City & County of Honolulu (Department of Transportation Services - "DTS") and the US Department of Transportation - Federal Transit Administration ("FTA").

Because of the uniqueness of the Honolulu Primary Urban Corridor in general, and the national strategic significance of Hawaii's (specifically Oahu, its most populous island) in particular, these comments derive from certain perceived risks which may not have been mitigated as they relate to the NATIONAL SECURITY INTEREST OF THE UNITED STATES OF AMERICA.

The events of recent world history reveal the need to rapidly mobilize and deploy personnel and material to diverse locations worldwide. As the "hub" of the Pacific Rim, Honolulu is home to several significant Army, Air Force, Marine and Navy installations. However, several points would require secure, dedicated transportation to air and/or water ports for debarkation in the event of a global incident. Herein lies the conceptual, design and operating risks of the Bus Rapid Transit ("BRT") - as the prime "inter"-dependent transit, its separability and utility for military logistics support is highly questionable.

Additionally, since the rights-of-way comprise or co-habit within high-volume civilian traffic infrastructure (principal highways, streets and roads), these thoroughfares would necessarily be targeted for disruption and consequently, likely result in substantial collateral damage, and further compromising military mobility.

The BRT system, as proposed, represents the devolution of more than 30 years of comprehensive rapid mass transit planning. If implemented as currently conceived, the BRT would have multiple short-comings which manifest as risks unacceptable in a logistical, industrial or functional perspective. Derail of sound transit logistics, the BRT is a prescription for island-wide gridlock.

The BRT appears to be a cogglomeration of compromises - a "lowest common denominator" solution with short-term goals sacrificed over long-term public welfare. The BRT plan hinges on certain structural financial premises which greatly decrease the likelihood that the BRT will continue to exist and functional, operationally and financially, in the near and distant future. Among these are:

- the preeminence of short-term operating vision, resulting in short-term cost overruns which may necessitate capitalizing costs in the future to offset and financial imbalances (growth of labor costs/usage benefits vs. revenue growth);

PASSPORT RAILROAD  
Post Office Box 2801 • Aiea, HI 96701-8281 • USA  
Telephone: (808) 484-2861 • Facsimile: (808) 487-8215 • E-mail: [PassPortRR@aol.com](mailto:PassPortRR@aol.com)



# PASSPORT RAILROAD

The selection of motive power (hybrid diesel/electric vs. diesel fuel); the commodity (i.e., diesel fuel) price risk remains essentially unchanged;

risk management costs (i.e., insurance - increased ridership, stops and likely accidents).

The issue of SAFETY looms large in the overall acceptability and viability of any mass transportation medium. Highly troubling in the inherent risks in the design of modern systems in a tightly packed, dense urban corridor. Notwithstanding the "separate" busway ramps, the riding public will be exposed to parallel traffic, plain and simple.

The TRANSPORTATION IMPACTS ANALYSIS deals with several issues, but neglects to address the DEMOGRAPHIC PROFILE of the proposed transit rider that will leave their vehicle and opt for the improved BRT transit service. With a new census completed, and the proposed service well-developed, this becomes a CRITICAL factor in the overall success of the system. How many vehicles (registered cars and trucks) are on the island? Since 1992, how has this number changed (growth rates for 1992-2000)? How many vehicles are projected for 2025?

The ALTERNATIVES ANALYSIS (Chapters 2 and 7) is superficial, cursory and perfunctory. Since tens of millions of federal dollars were invested in the preceding 1992 FEIS ("Honolulu Rapid Transit Program"), the results of those transit alternatives investigated (i.e., monorail, LRT) should be presented as a benchmark to the currently proposed alternative. By openly and directly comparing the financial ramifications and impacts of the options which have been eliminated, the rationale for selecting BRT can be justified as more than a politically correct alternative.

Concerning the FINANCIAL ANALYSIS, the level of detail and specificity leaves more questions than answers.

How many employees will be involved in operating the system at its capacity (2025)? What will be the average wage (hourly rate) paid to these employees in the years from 2001 to 2025? Will wages/benefits increase? Will there be a collective bargaining agreement (for cost containment)? What source of financing will be allocated to cost overruns - and what will be the cost of such funds?

Will all the fleet buses be deployed at one time? How will the new vehicles be financed? Will any unique or alternative financing mechanisms (i.e., cross-border leases) be employed, or will the buses be financing with long-term money from issuing municipal bonds?

We sincerely appreciate the opportunity to comment on the DEIS and look forward to the next phase of discussing and review as comments are incorporated into the final solutions for the traffic dilemma of the City and County of Honolulu.

Personal Note:  
  
Stanley E. Taylor  
President

c Governor, State of Hawaii (Office of Environmental Quality Control)  
Percuss, Binckerhoff Quade Douglas (Attn: Robert Branson)

Passport Railroad  
Post Office Box 2801 - Aiea, HI 96701-8281 - USA  
Telephone: (808) 484-2881 - Facsimile: (808) 487-8215 - E-mail: PassPortRR@aol.com

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 523-4329 - Fax: (808) 523-4720 - Internet: www.cc.honolulu.us



JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE "KEOKI" MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

Mr. Stanley E. Taylor II, President  
Passport Railroad  
P. O. Box 2801  
Aiea, Hawaii 96701-8281

Dear Mr. Taylor:

Subject: Primary Corridor Transportation Project

This is in response to your November 6, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. The events of recent world history reveal the need to rapidly mobilize and deploy personnel and material to diverse locations worldwide. At the "hub" of the Pacific Rim, Honolulu is home to several significant Army, Air Force, Marine and Navy installations. However, several posts would require secure, dedicated transportation to air and/or water ports for debarkation in the event of a global incident. Herein lies the conceptual, design and operating risks of the Bus Rapid Transit (BRT) - as the prime "inter"-dependent transit, its separability and utility for military logistics support is highly questionable.

Response: The military logistic support and need for rapid deployment are beyond the scope of the environmental impact statement because the project has no military purpose.

2. Additionally, since the rights-of-way comprise or co-habit within high-volume civilian traffic infrastructure (principal highways, streets and roads), these thoroughfares would necessarily be targeted for disruption and consequently, likely result in substantial collateral damage, and further compromising military mobility.

Response: The potential impact in the event of a military attack on Honolulu is beyond the scope of the EIS because the project has no military purpose.

3. The BRT systems, as proposed, represents the devolution of more than 30 years of comprehensive rapid mass transit planning. If implemented as currently conceived, the BRT would have multiple shortcomings which manifest as risks unacceptable in a logistical, intellectual or functional perspective. Devoted of sound transit logistics, the BRT is a prescription for island-wide gridlock.

Response: Comment noted.

4. The BRT appears to be a conglomeration of compromises -- a "lowest common denominator" solution with short-term goals sacrificed over long-term public welfare. The BRT plan hinges on

certain structural financial premises which greatly decrease the likelihood that the BRT will continue to exist and functional, operational and financial, in the near and distant future. Among these are a) the preeminence of short-term operating vision, resulting in short-term cost overruns which may necessitate capitalizing costs in the future to offset and financial imbalances (growth for labor cost/offset vs. revenue growth); b) The selection of motive power (hybrid diesel/electric vs. diesel fuel); the commodity (i.e., diesel fuel oil) risk remains essentially unchanged; c) risk management costs (i.e., insurance -- increased ridership, stops and likely accidents).

**Response:** There are no bases to support your hypothesized "risks". Prudent estimates have been used in preparing the ridership and financial analyses. The ridership and financial analyses are found in Chapters 4 and 6 of the FEIS, respectively.

5. **The issue of SAFETY bears large in the overall acceptability and viability of any mass transportation medium. Highly troubling is the inherent risks in the design of median stops in a tightly packed, dense urban corridor. Notwithstanding the "separate" busway ramps, the riding public will be exposed to parallel traffic, plain and simple.**

**Response:** The conceptual design of transit stops located in the median includes features such as protective railings to separate waiting passengers from the adjacent traffic lane and discourage transit patrons from exiting the platform except at designated locations. Traffic signals and cross walks will be provided at BRT stations to allow pedestrians to safely travel to and from the platforms.

6. **The TRANSPORTATION IMPACTS ANALYSIS deals with several issues, but neglects to address the DEMOGRAPHIC PROFILE of the proposed transit rider that will leave their vehicle and opt for the improved BRT transit service. With a new census completed, and the proposed service well-developed, this becomes a CRITICAL factor in the overall success of the system. How many vehicles (registered cars and trucks) are on the Island? Since 1992, how has this number changes (growth rates for 1992 - 2000)? How many vehicles are projected for 2025?**

**Response:** According to The State of Hawaii Data Book 2000, motor vehicles registered on Oahu between 1992 and 2000 were:

1991	611,512 vehicles
1992	604,602 vehicles
1993	600,087 vehicles
1994	601,239 vehicles
1995	598,772 vehicles
1996	595,121 vehicles
1997	594,096 vehicles
1998	597,610 vehicles
1999	614,985 vehicles

Oahu vehicle registrations increased less than one percent between 1992 and 2000.

7. **The ALTERNATIVES ANALYSIS (Chapters 2 and 7) is superficial, cursory and perfunctory. Since tens of millions of federal dollars were invested in the preceding 1992 FEIS ("Honolulu Rapid Transit Program"), the results of those transit alternatives investigated (i.e., monorail, LRT) should be presented as a benchmark to the currently proposed alternative. By openly and directly comparing the financial ramifications and impacts of the options which have been eliminated, the rationale for selecting BRT can be justified as more than a politically correct alternative.**

**Response:** The public and decision-makers had already seen the costs and benefits of various rail alternatives in the Honolulu Rapid Transit FEIS and at the outset of the current MISDEIS process indicated that elevated transit systems and systems that required increases in taxes were unacceptable. This left surface transit, either bus or rail as the only feasible options to be analyzed. As the process proceeded it became evident that the BRT Alternative offered virtually all of the benefits of light rail transit at substantial cost savings and with much more flexibility. Light rail transit was therefore dropped from further consideration so that the remainder of the analysis could concentrate on viable alternatives. It would have been wasteful of taxpayers' money to have continued to analyze an alternative once it was known that the general public and elected officials in the end would reject it.

8. **How many employees will be involved in operating the system at its capacity (2025)? What will be the average wage (hourly rate) paid to these employees in the years from 2001 to 2025? Will wages/benefits increase? Will there be a collective bargaining agreement (for cost containment)? What source of financing will be allocated to cost overruns -- and what will be the cost of such funds?**

**Response:** The FEIS assumes that the Refined LPA will be operated in a similar fashion to current bus operations, with collective bargaining agreements that will define wage and benefits to be paid. An estimate of transit employees for the Refined LPA has not been made. However, the number can be expected to increase in proportion to the increase in service provided. In 2025 the Refined LPA is expected to provide about 50 to 70 percent more service than in 1998 (depending on whether revenue vehicle miles or revenue vehicle hours are used to measure the increase). Thus the number of employees can be expected to be 50 to 70 percent more than in 1998.

According to the 1998 National Transit Database 1,405 full time employees were engaged in operations of TheBus, including employees in vehicle operations, maintenance and administration. No effort was made to separately calculate wage and benefit increases over the 24 year projection period. Total O&M costs were escalated at 2.5 percent, compounded annually.

The comment on cost overruns presumably refers to capital cost of the Refined LPA. The capital cost estimate for the Refined LPA includes both design and construction contingencies. The construction contingency is intended to cover change orders that might occur during construction due to unanticipated conditions. The construction contingency at this preliminary phase of the project amounts to 15 percent of the estimated construction cost. The construction contingency is funded from the same sources as all other components of the capital cost of the project.

9. **Will all the fleet buses be deployed at one time? How will the new vehicles be financed? Will any unique or alternative financing mechanisms (i.e., cross-border leases) be employed, or will the buses be financing with long-term money from issuing municipal bonds?**

**Response:** The MISDEIS and FEIS assume that all of the fleet buses for BRT and the entire public transportation system would be scheduled for use except those that are under repair or which are in preventive maintenance. Any new vehicles and replacement vehicles are financed from a variety of sources, including FTA Urbanized Area Formula Funds, FTA Fixed Guideway Modernization Funds, and City General Obligation Bonds. New Starts Funds would be used for a portion of the BRT vehicles.

Mr. Stanley E. Taylor  
Page 4  
November 13, 2002

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

**PMC** PACIFIC  
MANAGEMENT  
CORPORATION  
2201 Kalia Road, Suite 450, Honolulu, Hawaii 96815  
Telephone (808) 932-0388, Facsimile (808) 522-0961

November 8, 2000

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
711 Kapiolani Blvd., Suite 1200  
Honolulu, HI 96813

Subject: Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS)  
Primary Corridor Transportation Project (the "Project")

Dear Cheryl:

We appreciate the efforts of your department in attempting to provide a better public transportation system within Waikiki. While every project has its positive aspects, we have some concerns which we believe need to be addressed and resolved prior to the project going forward. These concerns include:

1. The BRT plan calls for a semi-exclusive mode on Kalikaua Avenue, but with a planned interval of every 4 minutes during peak hours and 8 minutes during non-peak hours, traffic flow to the center and ocean-side hotel properties could be affected in the area of Saratoga to Kapahulu. Perhaps moving the lane to the mauka side of Kalikaua Avenue where the transit vehicle can unload on the left side of the street might be a solution.
2. There would be numerous negative impacts to our visitors, residents and merchants in Waikiki by pushing loading areas for commercial passenger and bags loading to side streets. This would add to already overburdened side streets and create negative impressions for those visitors, residents and merchants who have to cart their luggage or goods, etc. to a side street to pick up transportation on arrival or departure and in the case of residents or merchants drop-off or pickup. Visitors from two fairly large hotels come into mind - the Outrigger Waikiki and the Moana Surfrider.
3. Shuttle stops on Lewers Street and Royal Hawaiian Avenues have doubled the traffic flow into the Center and have notably increased the traffic on Kalikaua Avenue. It would not be feasible to run these shuttles in the same lane as the BRT with the timing structure of 4 minutes and 8 minutes.

Sincerely,



CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE REEDER  
DEPUTY DIRECTOR

TPD02-00528

November 13, 2000

Ms. Churlian Wright  
Corporate Marketing Director  
Pacifi Management Corporation  
2201 Kalakaua Avenue, Suite A500  
Honolulu, Hawaii 96815

Dear Ms. Wright:

Subject: Primary Corridor Transportation Project

This responds to your November 8, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. The BRT plan calls for a semi-exclusive mode on Kalakaua Avenue, but with a planned interval of every 4 minutes during peak hours and 8 minutes during non-peak hours, traffic flow to the center and ocean-side hotel properties could be affected in the area of Saratoga to Kepahulu. Perhaps moving the lane to the mauka side of Kalakaua Avenue where the transit vehicle can unload on the left side of the street might be a solution.

Response: In the public outreach for the PCTP, DTS established a Working Group (WG) for the Waikiki area, which included representatives from the hotels, retail and service industries, commercial passenger and freight carriers, and residents. A detailed study of passenger and freight loading activities was performed and reviewed with the Waikiki WG. Discussions with this Working Group led to revisions in the proposed project that resulted in no appreciable loss of on-street loading space along the streets affected by the BRT. This will be achieved by allowing freight carriers to use the mauka BRT shared lane during legal delivery hours (10 p.m. to 9 a.m. on Kalakaua Avenue and 10 p.m. to 7:30 a.m. on Kuliou Avenue). During these hours the BRT will simply pass around a stopped loading truck by using the adjacent traffic lane. Right turning vehicles into Royal Hawaiian Shopping Center and ocean-side hotels will be able to use the curbside lane throughout the day.

2. There would be numerous negative impacts to our visitors, residents and merchants in Waikiki by pushing loading areas for commercial passenger and bags loading to side streets. This would add to already overburdened side streets and create negative impressions for those visitors, residents and merchants who have to cart their luggage or goods, etc. to a side street to pick up transportation on arrival or departure and in the case of residents or merchants drop-off or pickup. Visitors from two fairly large hotels come into mind -- the Outrigger Waikiki and the Moana Surfrider.

Response: The Refined LPA will not require that freight or passenger loading areas be relocated to side streets. Freight delivery vehicles will be able to freely use the mauka curb lane during legal

Letter to Cheryl D. Soon  
November 8, 2000  
Page Two

Adding another lane for other private transportation brings the vehicular traffic flow on Kalikaua Avenue down to two lanes from Saratoga to Kalikaua. From Kalikaua Avenue to Kepahulu Avenue, taking another lane away from vehicular traffic brings Kalikaua Avenue down to one lane which will truly be a negative impact on traffic on Kalikaua Avenue.

4. The placement of any BRT station in front of RHSC would have a material negative impact upon our tenants for obvious reasons and would be detrimental to us.

It is the consensus of our Tenants that these issues need to be addressed. We are confident that your department will be sensitive to the above concerns and will work with us to develop a Project which would be beneficial to all concerned.

Sincerely,

Churlian Wright  
Corporate Marketing Director

CW/sw

cc: Richard Wong  
Philip Chang  
Lee Miller  
Michael Lyum

shareddms/dms2000

## POLYNESIAN ADVENTURE TOURS

Ms. Charlan Wright  
Page 2  
November 13, 2002

loading hours and passenger loading by tour buses and trolleys will be permitted at all times. The BRT will simply pass around vehicles stopped in the curb lane.

3. Shuttle stops on Lewers Street and Royal Hawaiian Avenues have doubled the traffic flow into the Center and have notably increased the traffic on Kalakaua Avenue. It would not be feasible to run these shuttles in the same lane as the BRT with the timing structure of 4 minutes and 8 minutes.

**Response:** There are no BRT lanes proposed for either Lewers Street or Royal Hawaiian Avenue. On Kalakaua Avenue, the marked curb lane will be shared with tour buses, trolleys and right-turning vehicles; there is no requirement that "shuttles" use the curb lane.

4. The placement of any BRT station in front of RHSC would have a material negative impact upon our tenants for obvious reasons and would be detrimental to us.

**Response:** There are no plans for a traction power substation in front of the Royal Hawaiian Shopping Center.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Felth Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

14 November 2000

Mr. Duke Bainum, Chair  
Transportation Committee  
City Council  
City and County of Honolulu

RE: Resolution 00-249- Selection of a Locally Preferred Alternative for the Primary  
Corridor Transportation Project

Chair Bainum

I am writing in support of Resolution 00-249 which designates a regional bus rapid transit system to include a spur into Waikiki. I have met with City transportation officials and I have been assured that the Waikiki spur will not further impede traffic flow in Waikiki nor will my company be restricted with respect to servicing our customers. There is concern among others in our industry that the presently selected route down Kalakaua Avenue, however, will do just that i.e., impede traffic and restrict passenger pick-up's and movements. For that reason, I suggest that the Dept. Of Transportation Services explore alternate routes into and out of Waikiki before a final decision is made with respect to routes.

Thank you for the opportunity to present testimony.

Michael A. Carr  
President

**PRIMARY CORRIDOR TRANSPORTATION PROJECT**  
 Island of Oahu, Hawaii  
**SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT (SDEIS)**

The information you provide on this form will help the City & County of Honolulu and the Federal Transit Administration in the future planning of the Primary Corridor Transportation Project. We appreciate any comment you may have. Comments must be postmarked or received by May 7, 2002.

Name: MARCO RURENSTEIN  
 Representing: SUPERSTAR  
 Address: 5 Sand Island Rd #121  
Honolulu, HI 96819

Please make any comments below:

Simply puts NEARLY  
> THIS WILL COST A BILLION DOLLARS, 2/3'S OF  
WHICH IS TRAVELER MONEY  
> IT WILL NOT ONLY NOT SOLVE THE PROBLEM  
OF TRAFFIC, BUT THE ELIMINATION OF  
LANES WILL MAKE THE SITUATION WORSE  
> NO ONE WILL RIDE THIS SYSTEM. ~~ABOUT~~ ABOUT 90%  
OF PEOPLE DON'T USE THE BUS.  
> WHAT ABOUT THE VAST MAJORITY OF  
WEEKS, BUSINESSPEOPLE, TRADESPEOPLE (PLUMBERS,  
ELECTRICIANS), FREIGHT COMPANIES, & OTHERS  
WHO CANNOT RIDE THE BUS & NEED  
THEIR OWN CARS & TRUCKS? THE UNSTO  
MAN-HOURS IN TRAFFIC WILL BE  
INTOLERABLE!  
THE BRT IS NOT THE ANSWER.

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
 650 SOUTH KING STREET, 3RD FLOOR  
 HONOLULU, HAWAII 96813  
 Phone: (808) 522-4328 • Fax: (808) 522-4720 • Internet: www.cc.honolulu.hi.us



CHERYL D. SOON  
 DIRECTOR  
 GEORGE YEDOU MATSUOKA  
 DEPUTY DIRECTOR

November 13, 2002

Mr. Michael A. Carr, President  
 Polynesian Adventure Tours  
 1049 Kikowaena Place  
 Honolulu, Hawaii 96819

Dear Mr. Carr:

Subject: Primary Corridor Transportation Project

This is in response to your November 14, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. I am writing in support of Resolution 00-249 which designates a regional bus rapid transit system to include a spur into Waikiki. I have met with City transportation officials and I have been assured that the Waikiki spur will not further impede traffic flow in Waikiki nor will my company be restricted with respect to servicing our customers.

Response: Comment noted.

2. There is concern among others in our industry that the presently selected route down Kalakaua Avenue, however, will do just that: i.e., impede traffic and restrict passenger pick-ups and movements. For that reason, I suggest that the Department of Transportation Services explore alternate routes into and out of Waikiki before a final decision is made with respect to routes.

Response: Prior to selection of Kalakaua and Kuhio Avenues as the Locally Preferred Alternative routes in Waikiki, the DTS analyzed a variety of alternate routes including: (1) two-direction service on Kuhio Avenue; (2) a Kuhio Avenue-Ala Wai Boulevard BRT couplet; (3) a Kalakaua Avenue-Ala Wai Boulevard BRT couplet; and (4) turning back BRT service at or near Saratoga Road and Kalakaua Avenue. None of these alternatives would provide anywhere as good a service to residents and employees in central Waikiki as the Refined LPA route.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6876. We appreciate your interest in the project.

Sincerely,  
  
 CHERYL D. SOON  
 Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
630 SOUTH KING STREET, 3RD FLOOR  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE YEDON • MIYAMOTO  
DEPUTY DIRECTOR

Mr. Marc E. Rubenstein  
Page 2  
November 13, 2002

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

November 13, 2002

Mr. Marc E. Rubenstein  
Super Star  
5 Sand Island Access Road, Unit 121  
Honolulu, Hawaii 96819

Dear Mr. Rubenstein:

Subject: Primary Corridor Transportation Project

This is in response to your April 20, 2002 testimony regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. This will cost nearly a billion dollars, 2/3 of which is taxpayer money.

Response: This is a public project. All capital funding is taxpayer derived.

2. It will not only not solve the problem of traffic, but the elimination of lanes will make the situation worse.

Response: When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

3. No one will ride this system. About 90% of people don't use the bus.

Response: To be successful in meeting the project's goals requires that less than two percent of current auto drivers in the primary corridor use transit instead. The FEIS Chapter 4 includes the BRT ridership projections.

4. What about the vast majority of workers, business people, tradespeople (plumber, electricians), freight companies and others who cannot ride the bus and need their own cars and trucks? The wasted man-hours in traffic will be intolerable!

Response: We recognize that only about ten percent of the all the trips made in the primary corridor will be made on transit. That is why the BRT has been designed to not make traffic conditions worse, an in most places better for other users of the highway system, while significantly increasing the highway system's people carrying ability. The FEIS Chapter 4 presents the vehicle hours of savings with the Refined LPA.

Sincerely,

CHERYL D. SOON  
Director



# T. EKI, INC./EKI CYCLERY

*Serving Hawaii's families since 1911*

1603 Dillingham Boulevard, Honolulu, Hawaii 96817-4894  
Phone: (808) 847-2005 Fax: (808) 847-2006 E-mail: eki@aloha.com

October 27, 2000

## DILLINGHAM BOULEVARD CITY DOT IMPROVEMENTS

THOUGHTS/CONCERNS PER JAYNE & JAY KIM

Our top priority is bike lanes for commuters on both sides of Dillingham. Per Clyde, yes, there will be a 3 ft wide shoulder line drawn on either side of Dill.

Also, must have bike signs at the beginning, end & middle of Dill. (and all thoroughfares for that matter). This serves the purpose of both making cyclists feel welcome on the road as well as alerting drivers to 1) share the road and 2) be aware of cyclists.

*As a note: Is your business, place of work bicycle and pedestrian friendly? Do you have a bike parking rack or at least fencing or poles that customers and employees can lock up their bikes? And is the parking rack in a visible, convenient location? Most cyclists do not like to leave their bikes in obscure, hidden places even if it is locked up. For pedestrians, do you have a sidewalk connecting up to your entrances or at least crosswalk lining thru your parking lot?*

Other thoughts:

No concrete barriers separating two way traffic.

No trees or palms separating two way traffic. Businesses/destinations need to be easily visible from both sides of the boulevard.

Bus platform to have an "island" feel/look?

Concerns:

Length of project construction and time of year it will occur. Please avoid Christmas. Will there be any coming off of areas for any period of time?

EKIBIKE.....geared to the freedom & fitness of biking.....EKIBIKE

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU  
600 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 523-4329 Fax: (808) 523-4725 Website: www.dot.honolulu.hi.us



JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE KEONI IRIYAJUMOTO  
DEPUTY DIRECTOR

November 13, 2002

Ms. Jayne Kim and  
Mr. Jay Kim  
T. EKI, Inc./EKI Cyclery  
1603 Dillingham Boulevard  
Honolulu, Hawaii 96817-4894

Dear Mr. Kim and Ms. Kim:

Subject: Primary Corridor Transportation Project

This is in response to your October 27, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. No concrete barriers separating two-way traffic.  
**Response:** Concrete barriers are needed for safety reasons for the zipper lanes on H-1. In-Town there will be no concrete barriers separating the BRT lanes from other traffic.
2. No trees or palms separating two way traffic. Businesses/destinations need to be easily visible from both sides of the boulevard  
**Response:** The Refined LPA does not include trees or palms separating two-way traffic more than exists today.
3. Bus platform to have an "island" feel/look?  
**Response:** The appearance of transit stops will be related to their surrounding community. They will be designed to be highly contextual and pedestrian friendly.
4. Length of project construction and time of year it will occur. Please avoid Christmas.

**Response:** To minimize the impact and ensure access to businesses and residences along Dillingham Boulevard, construction will occur in phases. The initial phase will be the ADA improvements on the mauka side of Dillingham Boulevard. The second phase will be road widening, power relocation, and pavement reconstruction. Access to businesses and residences during this stage is critical and will be maintained at all times. The third and final stage will be the installation of dedicated lanes in the middle of Dillingham Boulevard. Access to businesses will be maintained by allowing a strategically placed left turn crossings across the construction areas. The phases will overlap with one another as soon as it is most feasible. Construction during the Christmas season is unavoidable, as the overall construction duration is expected to be greater than a year. Again, however, access to businesses and residences will be maintained throughout the entire period of construction.

Ms. Jayne Kim and  
Mr. Jay Kim  
Page 2  
November 13, 2002

5. Will there be any coning off of areas for any period of time?

**Response:** During the final design phase, a detailed set of traffic management plans will be developed. The plans will identify specific localities where and for how long the roadways will be coned off during construction.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6876. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

Testimony for October 5, 2000 Public Hearing on the Primary Corridor  
Transportation Project 10/5/00

Good Evening Chairman and members of Committee on Transportation, my name is Alex Kagiwa and I am from Trans Hawaiian Services. Trans Hawaiian is a locally owned tour and transportation company that provides passenger carrier services to visitors and the general public.

We appreciate that the City has established a "locally preferred alternative" process for its Primary Corridor Transportation project. While we support all efforts by public and private organizations to improve mobility, we do not support alternatives that will disrupt the quality of service provided by locally owned businesses.

As a locally owned corporation in the State of Hawaii, we would like to take this opportunity to express our concerns on the Bus Rapid Transit alternative in the Primary Corridor Transportation project.

I would like to focus our attention on our opposition on the use of Kalakaua Avenue as part of the Waikiki BRT route.

In the past, city buses were rerouted from Kalakaua Avenue to Kubio Avenue to reduce traffic congestion on Kalakaua. The MISSEFIS provisions for BRT city buses and the congestion back on Kalakaua Avenue. The proposed BRT Kalakaua route should be shifted back to Kubio Avenue and follow existing city bus patterns for its Waikiki movements. As an alternative to the Kapabaha, Paki Street turnaround loop, Jefferson school could be converted into a turn-around terminus for BRT vehicles.

Many of our customers expect us to have pickup locations on Kalakaua Avenue, especially for our shopping shuttle tour programs. Adding the BRT stops on Kalakaua would create more congestions in these areas which decreases our quality of service.

Several months ago we have proposed the City to look at loading zone alternatives for shuttle tour programs, such as trolleys and shopping shuttles. Our proposal included utilizing areas that are separate from popular tour bus loading zones. Some of these new shuttle stop locations are along Kalakaua Avenue between Lewers and the end of Royal Hawaiian Shopping Center. These areas are currently being used by freight companies to stage vehicles while waiting for an open loading zone or to offload goods at nearby stores and shops. With some improvement, these loading areas can be better utilized by establishing loading zones for shuttle programs.

This concludes my testimony and I would like to thank the committee for its consideration in your decision to select a locally preferred alternative for rapid transit in Hawaii. Locally owned tour and transportation companies prefer not to have Kalakaua as



### Testimony for October 12, 2000 Public Hearing

Good Morning Director Soon and members of the Department of Transportation Services. My name is Alex Kagawa from Trans Hawaiian Services. Trans Hawaiian is a locally owned tour and transportation company that provides passenger carrier services to visitors and the general public.

We appreciate that the City has established a "locally preferred alternative" concept for its Primary Corridor Transportation project.

As a locally owned corporation in the State of Hawaii, we would like to take this opportunity to express our concerns on the Bus Rapid Transit alternative in the Primary Corridor Transportation project.

In the past, city buses were removed from Kalakaua Avenue to alleviate traffic congestion. MUSD/DEIS proposes to put city buses and the congestion back on Kalakaua Avenue. The proposed BRT Kalakaua route should be shifted to Kuhio Avenue and follow the existing city bus pattern for its Waikiki movements or another alternative would be to utilize Ala Wai Boulevard.

Tour companies must be allowed to pickup along Kalakaua and Kuhio avenues. If the frequency of BRT vehicles are every 4 minutes, then this would create massive congestion along Kalakaua and Kuhio Avenues of BRT vehicles, tour vehicles and rental cars.

I have a few other concerns that I would like to mention at this time, first, if hotel workers normally start before peak morning traffic and end before peak evening traffic, is it possible that we could save some of our tax dollars by eliminating the BRT option for Waikiki and keeping the existing bus system? Secondly, now that Governor Cayetano has announced that he will be implementing later start times for state employees, how will this impact the need for BRT?

In closing, I would like to thank the department for their efforts in improving our public transit system and for its consideration in the selection of a locally preferred alternative for rapid transit in Hawaii.

November 6, 2000

Ma. Cheryl Soon, Director  
Department of Transportation Services  
711 Kapiolani Boulevard  
Honolulu, HI 96813

**SUBJECT: Comments on the Major Impact Study / Draft Environmental Impact Statement: Primary Corridor Project**

Dear Ma. Soon:

Thank you allowing us the opportunity to provide comment on the Draft Environmental Impact Study for the Primary Corridor Project. We hope that our comments and suggestions will help the City in its selection of a locally preferred alternative for the Primary Corridor Project for the City and County of Honolulu.

Trans Hawaiian supports enhancements in public transit services including, Zipper lanes, HOV lanes, LOTMA commuter express, Milliani Trolley and Kaimuki Trolley.

However, Trans Hawaiian asks the City to consider the negative impact to locally owned, private tour and transportation companies if the Primary Corridor project includes a route along Kalakaua Avenue. As state certified passenger carriers, the majority of our business is derived from visitors vacationing in Waikiki. Locally owned private transportation companies are requesting for more of the unusable tour bus loading zones to be activated so that it may service its clients and alleviate traffic congestion at the existing tour bus loading zones. Secondly, the proposed Primary Corridor Project route on Kalakaua Avenue will add to the traffic congestion increasing the difficulties of private tour company's ability to provide service to its clients in Waikiki.

Our main concern is the use of Kalakaua Avenue in Waikiki. A public transit system on Kalakaua Avenue with a 4 to 8 minute frequency will make it impossible for private tour and transportation companies to service its clients, even if the lanes and passenger loading areas are shared between public transit vehicles and private tour vehicles.



Private tour and transportation companies have requested the City to activate existing but unusable, loading zone areas on Kalakaua Avenue for the private tour shuttle and trolley vehicles. This will alleviate the congestion in the existing, but limited, tour vehicle loading zones and will reduce traffic congestion along Kalakaua Avenue.

An alternative to the proposed routing in Waikiki, we would like to offer the following suggestion:

Develop a public transit system that utilizes one lane of Kuhio in the East bound direction, marks on Kapuhahu Avenue and then, a lane on Ala Wai Blvd. for the West bound direction.

The density of local residents is much greater on the Ala Wai than on Kalakaua Avenue, therefore a transit system here would help to service residents along Ala Wai Blvd. Having a transit system that utilizes one lane on Kuhio Avenue will help to reduce traffic congestion and would allow the private tour vehicles access to critical tour vehicle loading zones on Kuhio Avenue as well as Kalakaua Avenue.

Once again, thank you for allowing us the opportunity to provide comments on the Draft Environmental Impact Study for the Primary Corridor Project for the City and County of Honolulu. If you have any questions on our suggestions or comments, please feel free to call me at 808-566-7561.

Sincerely,

A handwritten signature in cursive script that reads 'Alex Kagawa'.

Alex Kagawa  
Administrator

November 14, 2000

Testimony for Transportation Committee Hearing on November 14, 2000

SUBJECT: Comments on the Major Impact Study / Draft Environmental Impact Statement: Primary Corridor Project

Good Morning Chairman and members of the Transportation Committee. My name is Alex Kagawa and I am from Trans HAWAIIAN. Trans HAWAIIAN is a locally owned tour and transportation company.

Thank you for allowing us the opportunity to provide comment on the Draft Environmental Impact Study for the Primary Corridor Project. We hope that our comments and suggestions will help the City in its selection of a locally preferred alternative for the Primary Corridor Project for the City and County of Honolulu.

Trans HAWAIIAN supports enhancements in public transit services including, Zipper lanes, HOV lanes, LOTMA commuter express, Mililani Trolley and Kaimuki Trolley.

However, Trans HAWAIIAN asks the City to consider the negative impact to locally owned, private tour and transportation companies if the Primary Corridor project includes a route along Kalakaua Avenue. As state certified passenger carriers, the majority of our business is derived from visitors vacationing in Waikiki. Locally owned private transportation companies are requesting for more of the unusable tour bus loading zones to be activated so that it may service its clients and alleviate traffic congestion at the existing tour bus loading zones. Secondly, the proposed Primary Corridor Project route on Kalakaua Avenue will add to the traffic congestion increasing the difficulties of private tour company's ability to provide service to its clients in Waikiki.

Our main concern is the use of Kalakaua Avenue in Waikiki. A public transit system on Kalakaua Avenue with a 4 to 8 minute frequency will make it impossible for private tour and transportation companies to service its clients, even if the lanes and passenger loading areas are shared between public transit vehicles and private tour vehicles.

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**

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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE "BOB" MIYAMOTO  
DEPUTY DIRECTOR

TPD11700-05420R

November 13, 2002

Mr. Alex Kagawa  
Trans-Hawaiian Services  
720 Waiwai Road, Suite 101  
Honolulu, Hawaii 96817-5316

Dear Mr. Kagawa:

Subject: Primary Corridor Transportation Project

This is in response to your comments on the Major Investment Study/Draft Environmental Impact Statement (MISDEIS). We are responding to your oral testimony at the October 5, 2000 Special Transportation Committee Meeting, your October 5, 2000 letter, your October 12, 2000 written testimony, your oral testimony at the October 12, 2000 formal Public Hearing, your November 6, 2000 letter, your November 14, 2000 letter, and your oral testimony at the November 14, 2000 Special Transportation Committee Meeting regarding the MISDEIS:

1. While we support all efforts by public and private organizations to improve mobility, we do not support alternatives that will disrupt the quality of service provided by locally owned businesses.

Response: Since publication of the MISDEIS, the City has worked with the Waikiki Working Group and other interested parties to redesign the BRT in Waikiki to minimize impacts on vehicular traffic and private bus operations, and to maximize opportunities for widening sidewalks on Kuhio Avenue. Changes include allowing tour buses, trolleys and right turning vehicles to share the BRT lanes in Waikiki, and providing for a minimum of a combined eight feet of sidewalk widening on one or both sides of Kuhio Avenue. As shown in FEIS Table 4.2-7, the impacts of giving priority to the In-Town BRT and other buses on traffic conditions in Waikiki will not be significant.

2. In the past, city buses were rerouted from Kalakaua Avenue to Kuhio Avenue to reduce traffic congestion on Kalakaua. The MISDEIS proposes to put BRT city buses and the congestion back on Kalakaua Avenue. The proposed BRT Kalakaua route should be shifted back to Kuhio Avenue and follow existing city bus pattern for its Waikiki movements. As an alternative to the Kapahulu, Pali Street turnaround loop, Jefferson school could be converted into a turn-around terminus for BRT vehicles.

Response: The proposed routing of the BRT with a one-way loop on Kalakaua and Kuhio Avenues was found to best serve the travel needs of the projected users of the system, namely Waikiki workers, Waikiki residents, and visitors to Waikiki (both Oahu residents and tourists). Along this portion of Waikiki there are 14,300 jobs along Kalakaua Avenue and 10,500 along Kuhio Avenue. There are 1,700 housing units along Kalakaua Avenue and 4,500 along Kuhio Avenue. There are 12,200 hotel rooms along Kalakaua Avenue and 4,200 along Kuhio Avenue. In other words a loop along Kalakaua and Kuhio Avenues would directly serve all of these

Private tour and transportation companies have requested the City to activate existing, but unstable, loading zone areas on Kalakaua Avenue for the private tour shuttle and trolley vehicles. This will alleviate the congestion in the existing, but limited, tour vehicle loading zones and will reduce traffic congestion along Kalakaua Avenue.

An alternative to the proposed routing in Waikiki, we would like to offer the following suggestion:

Develop a public transit system that utilizes one lane of Kuhio in the East bound direction, mauka on Kapahulu Avenue and then, a lane on Ala Wai Blvd. for the West bound direction.

The density of local residents is much greater on the Ala Wai than on Kalakaua Avenue, therefore a transit system here would help to service residents along Ala Wai Blvd. Having a transit system that utilizes one lane on Kuhio Avenue will help to reduce traffic congestion and would allow the private tour vehicles access to critical tour vehicle loading zones on Kuhio Avenue as well as Kalakaua Avenue.

Once again, thank you for allowing us the opportunity to provide comments on the Draft Environmental Impact Study for the Primary Corridor Project for the City and County of Honolulu. If you have any questions on our suggestions or comments, please feel free to call me at 808-566-7561.

Sincerely,

Alex Kagawa  
Administrator

potential users, whereas a two-way operation on Kuhio Avenue would only directly serve a portion of the travel market. Further, a two-way loop on Kuhio Avenue would displace passenger and freight loading zones or would result in traffic delays if the loading zones weren't displaced. By contrast, the Kalaka'aua/Kuhio loop maintains auto access as well as passenger and freight loading zones on both Kalaka'aua and Kuhio Avenues.

3. Many of our customers expect us to have pickup locations on Kalaka'aua Avenue, especially for our shopping shuttle four programs. Adding the BRT stops on Kalaka'aua would create more congestion in these areas which decreases our quality of service.

**Response:** According to the traffic analysis presented in the FEIS Table 4.2-7, the level of congestion on Kalaka'aua Avenue will not be significantly different in 2025 with the addition of the BRT. Tour buses would still be able to drop-off and pick-up passengers at designated loading zones.

4. Several months ago we have proposed the City to look at loading zone alternatives for shuttle four programs, such as freeways and shopping shuttles. Our proposal included utilizing areas that are separate from popular four bus loading zones. Some of these new shuttle stop locations are along Kalaka'aua Avenue between Levers and the end of Royal Hawaii Shopping Center. These areas are currently being used by freight companies to stage vehicles while waiting for an open loading zone or to offload goods at nearby stores and shops. With some improvement, these loading areas can be better utilized by establishing loading zones for shuttle programs.

**Response:** Comment duly noted and will be taken into consideration as these details are finalized.

5. Locally owned tour and transportation companies prefer not to have Kalaka'aua as part of the Primary Corridor Transportation Project.

**Response:** Comment noted.

6. In the past, city buses were rerouted from Kalaka'aua Avenue to Kuhio Avenue to reduce traffic congestion on Kalaka'aua. The MISDEIS proposes to put BRT city buses and the congestion back on Kalaka'aua Avenue. The proposed BRT Kalaka'aua route should be shifted to Kuhio Avenue and follow the existing city bus pattern for its Waikiki movements or another alternative would be to utilize Ala Wai Boulevard.

**Response:** See response to comment #2 for the two-way Kuhio Avenue operation. With regard to a Kuhio Avenue/Ala Wai Boulevard loop, it would be even further removed from the large number of jobs and hotel rooms on Kalaka'aua Avenue. Travel time analysis indicates that with a Kuhio Avenue/Ala Wai Boulevard routing, an extra 3.3 minutes trip time would be added to over 85 percent of the projected BRT riders starting their trip in this part of Waikiki, when compared to the Kalaka'aua/Kuhio Avenue loop.

7. Tour companies must be allowed to pickup along Kalaka'aua and Kuhio avenues. If the frequency of BRT vehicles are every 4 minutes, then this would create massive congestion along Kalaka'aua and Kuhio Avenues of BRT vehicles, tour vehicles and rental cars.

**Response:** See response to comment #3.

8. I have a few other concerns that I would like to mention at this time, first, if hotel workers normally start before peak morning traffic and end before peak evening traffic, is it possible that we could save some of our tax dollars by eliminating the BRT option for Waikiki and keeping the existing bus system?

**Response:** The BRT is meant to complement local bus service in Waikiki and elsewhere in the Primary Transportation Corridor by providing a faster more reliable service for riders by offering limited stop operations in bus priority lanes. Hotel workers in Waikiki are among those who will benefit from the proposed BRT since the BRT system will provide benefits throughout the day not just during peak hours. There are many other workers and residents in Waikiki who commute during normal peak periods who will also benefit from the BRT serving Waikiki.

9. Secondly, now that Governor Cayetano has announced that he will be implementing later start times for state employees, how will this impact the need for BRT?

**Response:** Even with implementation of later start times for State employees, there is still a need for the Refined BRT.

10. On the BRT project, has the City considered what the negative economic impact to locally owned transportation companies would be? For example, on Kalaka'aua and Kuhio Avenues, tour vehicles are every four minutes. This would create massive congestion along Kalaka'aua and Kuhio Avenues.

**Response:** Through community outreach efforts including working with members of the Hawaii Transportation Association which represents private freight and passenger carriers, the sub area Working Groups, the Waikiki Improvement Association, and others, DTS has developed a plan which minimizes direct impacts on passenger and freight loading zones, and, in the event of unavoidable adverse impacts, identifies alternate loading locations for all businesses along the BRT route. There will not be any measurable impact on businesses due to the loss of any loading zones. See also response to comment #3.

11. My other concerns are, if hotel workers are normally start work before the peak morning traffic and end before the peak evening traffic, then would it be possible to eliminate the BRT option for Waikiki and maintain the existing bus system?

**Response:** See response to comment #8.

12. My third concern is that, now that Governor Cayetano has announced that he would be implementing the later start times plan for State employees, how will this impact the need for BRT?

**Response:** See response to comment #9.

13. Trans Hawaiian supports enhancements in public transit services including, Zipper lanes, HOV lanes, LOTMA commuter express, Maiana Trolley and Kaimuki Trolley.

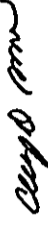
**Response:** Comment noted.

25 percent would be Oahu residents visiting Waikiki for business, shopping or recreation, and tourists. For these workers and visitors, the Kalakaua/Kuhio loop would more directly serve their needs.

As far as effects to private tour vehicles, loading zones for private buses are proposed to be retained on Keiākaua and Kuhio Avenues with the BRT alignment.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

14. However, Trans Hawaiian asks the City to consider the negative impact to locally owned, private tour and transportation companies if the Primary Corridor project includes a route along Keiākaua Avenue.

Response: See responses to comments #3 and #10.

15. As state certified passenger carriers, the majority of our business is derived from visitors vacationing in Waikiki. Locally owned private transportation companies are requesting for more of the unstable tour bus loading zones to be activated so that it may service its clients and alleviate traffic congestion at the existing tour bus loading zones.

Response: The BRT would not preclude continued use of any of the existing passenger or freight loading zones on either Keiākaua or Kuhio Avenues.

See responses to comments #3 and #10.

16. Secondly, the proposed Primary Corridor Project route on Keiākaua Avenue will add to the traffic congestion increasing the difficulties of private tour company's ability to provide service to its clients in Waikiki.

Response: See responses to comments #3 and #10.

17. Our main concern is the use of Keiākaua Avenue in Waikiki. A public transit system on Keiākaua Avenue with a 4 to 8 minute frequency will make it impossible for private tour and transportation companies to service its clients, even if the lanes and passenger loading areas are shared between public transit vehicles and private tour vehicles.

Response: See responses to comments #3 and #10.

18. Private tour and transportation companies have requested the City to activate existing, but unusable, loading zone areas on Keiākaua Avenue for the private tour shuttle and trolley vehicles. This will alleviate the congestion in the existing, but limited, tour vehicle loading zones and will reduce traffic congestion along Keiākaua Avenue.

Response: See response to comment #10.

19. An alternative to the proposed routing in Waikiki, we would like to offer the following suggestion: a) Develop a public transit system that utilizes one lane of Kuhio in the East bound direction, one lane on Keiākaua Avenue and then, a lane on Ala Wai Blvd. for the West bound direction. b) The density of local residents is much greater on the Ala Wai than on Keiākaua Avenue, therefore a transit system here would help to service residents along Ala Wai Blvd. Having a transit system that utilizes one lane on Kuhio Avenue will help to reduce traffic congestion and would allow the private tour vehicles access to critical tour vehicle loading zones on Kuhio Avenue as well as Keiākaua Avenue.

Response: See response to comment #6.

It is true that a Kuhio/Ala Wai loop would more directly serve residents in this portion of Waikiki. (There are 4,500 residential units along Ala Wai, 4,500 along Kuhio, and 1,700 along Keiākaua.) The problem is that only about 25 percent of the projected riders in this area would be residents. It is estimated that fifty percent of BRT users in Waikiki would be workers and the remaining

September 27, 2000

Attention: Ms. Cheryl D. Soon, Director  
City & County of Honolulu  
Department of Transportation Services  
711 Kapiolani Boulevard, suite 1200  
Honolulu, Hawaii 96813

Dear Ms. Soon:

Subject: Primary Corridor Transportation Project

Thank you for the opportunity to review and comment on the major investment study/draft environmental impact statement for the subject project.

Verizon Hawaii has facilities along the three proposed plans that may be impacted by the project. Further review is required by Verizon Hawaii during the design stages of the project to determine the scope of work and if there will be any associated relocation costs.

If you have any questions or require assistance in the future on this project, please call Les Loo at 840-5861.

Sincerely,

*Jill Z. Lee*

Jill Z. Lee  
Section Manager  
Access Design & Construction

**verizon**

Verizon Hawaii Inc.  
P.O. Box 2200  
Honolulu, HI 96841

JEREMY HARRIS  
LAWYER

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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CHERYL D. SOON  
DIRECTOR  
GEORGE MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD9/00-04713R

Ms. Jill Z. Lee  
Section Manager  
Access Design & Construction  
Verizon Hawaii Inc.  
P. O. Box 2200  
Honolulu, Hawaii 96841

Dear Ms. Lee:

Subject: Primary Corridor Transportation Project

This is a response to your September 27, 2000 letter regarding your comment on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

Verizon Hawaii has facilities along the three proposed plans that may be impacted by the project. Further review is required by Verizon Hawaii during the design stages of the project to determine the scope of work and if there will be any associated relocation costs.

Response: We agree. Designers will also coordinate with Verizon Hawaii and other agencies and providers during the final design stage.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

*Cheryl D. Soon*

CHERYL D. SOON  
Director





## VICTORIA WARD, LIMITED

1310 AUUHI STREET, SUITE 115 • HONOLULU, HAWAII 96814-4922 • TEL: (808) 591-8411 • FAX: (808) 596-4919

10/12/2000

October 12, 2000

Primary Corridor Transportation Project  
Major Investment Study/Draft Environmental Impact Statement

Testimony of Jeffrey C. Dinsmore  
Chief Financial Officer  
Victoria Ward, Limited

Good evening and thank you for the opportunity to speak about your proposed improvements to our city's transportation system. The Primary Corridor Transportation project proposed by the City Department of Transportation Services will impact Victoria Ward, Limited properties. The Draft Environment Impact Statement prepared for three different transportation alternatives analyzes a "No-Build" alternative, Transportation System Management (TSM) alternative, and Bus Rapid Transit (BRT) alternative. Having reviewed the DEIS in general, we offer the following comments:

- The No-Build and TSM alternatives have very little impact to VWL properties. The TSM alternative indicates a route along Ala Moana Boulevard. A potential impact of these alternatives may be the redistribution of traffic from Ala Moana Boulevard to other streets due to the increased congestion for personal vehicles resulting from preference given to transit vehicles.
- With respect to the BRT alternative:
  - a. The BRT alternative will more positively affect VWL properties as the proposed corridor includes Halekuanila Street, Pohukaina Street, and Auahi Street, all of which Street, the diamond head entrance to our property.
  - b. Lanes on Auahi Street would be reduced from the existing four lanes to two from Ward Avenue to Queen Street. This would help to slow down traffic flow and Honolulu.
  - c. The DEIS indicates that construction of parking facilities may be considered in certain areas which would facilitate our future development plans.
  - d. A transit station is proposed at Kamakee Street that would enhance potential customer movement to our site, specifically our new entertainment center that will be opening in early summer of 2001.

In closing, we support the BRT alternative as currently proposed and believe that it will improve traffic flow within Honolulu's urban core and improve connection between in town destinations. Thank you for the opportunity to speak on this matter.

## DEPARTMENT OF TRANSPORTATION SERVICES CITY AND COUNTY OF HONOLULU

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SERENY HARRIS  
LAWER



CHEUNG D. SOOH  
DIRECTOR

GEORGE TEGORI I. MIYAMOTO  
COUNTY DIRECTOR

November 13, 2002

Mr. Jeffrey C. Dinsmore, Chief Financial Officer  
Victoria Ward Limited  
1210 Auahi Street, Suite 115  
Honolulu, Hawaii 96814-4922

Dear Mr. Dinsmore:

Subject: Primary Corridor Transportation Project

This is in response to your October 12, 2000 letter, your oral testimony at the October 12, 2000 formal Public Hearing, and your support at the November 14, 2000 Special Transportation Committee Meeting regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. The No-Build and TSM alternatives have very little impact to VWL properties. The TSM alternative indicates a route along Ala Moana Boulevard. A potential impact of these alternatives may be the redistribution of traffic from Ala Moana Boulevard to other streets due to the increased congestion for personal vehicles from preference given to transit vehicles.

**Response:** The Refined LPA (BRT Alternative) does not use Ala Moana Boulevard in the vicinity of Victoria Ward properties. It uses roadways that are parallel to Ala Moana Boulevard. The Kakaako Makai branch will use Iiako Street and the Kakaako Mauka branch uses Pohukaina Street between South Street and Ward Avenue, and Auahi Street between Ward Avenue and Queen Lane (IBM Building). The BRT will be operating in semi-exclusive curb lanes on Pohukaina and Auahi Streets and in mixed traffic on Iiako Street.

2. The BRT alternative will more positively affect VWL properties as the proposed corridor includes Halekuanila Street, Pohukaina Street, and Auahi Street, all of which VWL properties front. The corridor connects back to Ala Moana Boulevard at Queen Street, the diamond head entrance to our property.

**Response:** Comment noted.

3. Lanes on Auahi Street would be reduced from the existing four lanes to two from Ward Avenue to Queen Street. This would help to slow down traffic flow and enhance our development plans in creating a 2-block "Main Street" in mid-town Honolulu.

**Response:** Comment noted.

Mr. Jeffrey C. Dinsmore  
Page 2  
November 13, 2002

4. The DEIS indicates that construction of parking facilities may be considered in certain areas, which would facilitate our future development plans.  
Response: Chapter 4 of the MIS/DEIS and the FEIS state that replacement parking in new off-street parking facilities would be considered, but only if they meet other livable community objectives and are a result of community based planning. For example, replacement parking will be considered for the neighborhood around University Avenue, where 78 on-street parking spaces will be lost.  
5. A transit station is proposed at Kamakee Street that would enhance potential customer movement to our site, specifically our new entertainment center that will be opening in early summer of 2001.  
Response: Comment noted.  
6. In closing, we support the BRT alternative as currently proposed and believe that it will improve traffic flow within Honolulu's urban core and improve connection between in town destinations.  
Response: Comment noted.  
7. The Primary Corridor Transportation Project proposed by the City Department of Transportation Services will impact Victoria Ward, Limited properties.  
Response: Comment noted.  
8. The No-Build and TSM alternatives have very little impacts to our properties. The TSM alternative indicates a route along Ala Moana Boulevard. A potential impact of these alternatives may be the redistribution of traffic from Ala Moana Boulevard to other streets due to the increased congestion for personal vehicles resulting from preference given to transit vehicles.  
Response: See response to comment #1.  
9. With respect to the BRT Alternative, the BRT alternative will more positively affect Victoria Ward, Limited properties as the proposed corridor includes Halekuanila Street, Puhukaina Street, and Auehi Street, all of which our properties front. The corridor connects back to Ala Moana Boulevard at Queen Street, the Diamond Head entrance to our property.  
Response: Comment noted.  
10. Lanes on Auehi Street would be reduced from the existing four lanes to two from Ward Avenue to Queen Street. This would help to slow down traffic flow and enhance our development plans in creating a 2-block "Main Street" in mid town Honolulu.  
Response: Comment noted.  
11. The DEIS indicates that construction of parking facilities may be considered in certain areas which would facilitate our future development plans.  
Response: See response to comment #4.

Mr. Jeffrey C. Dinsmore  
Page 3  
November 13, 2002

12. A transit station is proposed at Kamakee Street that would enhance potential customer movement to our site, specifically our new entertainment center that will be opening in early summer of 2001.  
Response: Comment noted.  
13. In closing, we support the BRT alternative as currently proposed and believe that it will improve traffic flow within Honolulu's urban core and improve connection between in town destinations.  
Response: Comment noted.  
We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

5/5/02



MAY 8 2002

**COMMENTS FOR DEIS**

I have 2 comments to make re: the DEIS:

1. Adequate Notice and
2. Impact on Business along the BRT route.

In my opinion a great majority of citizens, property owners, tenants, businesses, employees - especially those on the proposed BRT route - are not only not aware of the BRT, but certainly not aware of the serious problems that the BRT would create. I, and several other Dillingham area businessmen, personally walked several blocks of Dillingham Blvd. and talked with over 40 businesses owners. **NOT ONE OF THESE BUSINESSES OWNERS KNEW WHAT BRT WAS!** We have petitions people signed that were concerned about BRT, by over 300 people available for your review.

Many of these property owners and businesses, were concerned that that BRT calls for exclusive use of the 2 center lanes along the entire length of Dillingham Blvd. Effectively, 3 lanes out of 5 lanes total, would be unavailable to local traffic. That leaves only one lane in each direction to service Dillingham, and each of those "one" lanes would be shared by cars, local buses, and a proposed bikeway. If you are not familiar with Dillingham Blvd. and the implications that this would have, we suggest you take a drive up and down Dillingham to get a sense of the dramatic and devastating impact that would have on the businesses, property owners and local community.

This plan would render Dillingham Monday thru Friday to permanent gridlock for local traffic. As it is now, driving in either of the far right lanes, is extremely slow due to local bus stops.

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EMAIL: [lyork@yorkco.com](mailto:lyork@yorkco.com) • WEBSITE: [yorkco.com](http://yorkco.com)

A more common sense solution would be to use contra flow and HOV lanes for Dillingham for only rush hour traffic, in the morning and afternoon, allowing automobile traffic the use of those center lanes for all times other than rush hour.

We don't feel that the public has been fairly notified and involved in the decision making process. This is such a major issue that will dramatically impact everyone in Honolulu, that we are insisting that the City, State and Fed. do not rush to a decision they might regret.

We have been told at each of the countless BRT meetings that there have been many meetings, public notices and hearings and that everything possible has been done to inform the community of the BRT. Unfortunately the reality is that vast majority of the public don't have a clue as to the reality of what is planned. And it won't be until the actual construction starts that the real community sentiment will then rear its ugly head."

We think that if there are to be long term workable solutions that there must be compromise from both affected property owners/businesses and our representatives. And to reach those solutions all parties must first be aware of what is being discussed, which we don't think is the case. Then the dialectic and discourse can commence to hammer out viable, acceptable transportation solutions.

Aren't we trying to solve rush hour traffic? What is the agenda here? And Dillingham is just one example along the entire BRT route. What about the rest of the route and its impact?

We believe that the simple combination of, contraflow, HOV lanes, parking innovations, use of private buses and vans, bike ways, and getting uninsured drivers off the roads would lead to much better results than the BRT.

Are our elected representatives willing to go on the record as those who has approved massive traffic gridlock in the Primary Corridor? Are

DEPARTMENT OF TRANSPORTATION SERVICES  
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JEFF HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE KEOKI MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPDS02-01858R

Mr. James York  
York & Company, Inc.  
935 Dillingham Blvd  
Honolulu, Hawaii 96817  
Dear Mr. York:

Subject: Primary Corridor Transportation Project

This is in response to your testimony at the Public Hearing on April 20, 2002 and your May 5, 2002 letter regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. This is the BRT system, how I see it every day. That is Dillingham Avenue last week. I wanted to state, as part of my testimony, quickly, that I support the McCully Neighborhood Board's position.

Response: Thank you for attending the public hearing expressing your views regarding the project.

2. I also want, for the record, want to submit a copy of the report to the City and County of Honolulu, the Transportation and Traffic Management Planning Task Force of July 1993. And it does have the solution that - common sense solutions, nonpolitical.

Response: Comment noted.

3. Firstly, I was told that this was a meeting for the FTA and that we're addressing federal guidelines for transit projects. And in my opinion, they've not been followed in all the cases.

Response: The purpose of the April 20<sup>th</sup> meeting was to receive public comments regarding the BRT project that was published in the DEIS and SDEIS.

4. Specifically, the first is adequate notice. The common citizens must be notified of the planned project.

Response: The project's public involvement process began in 1988 with the TRANS 2K meetings. There have been hundreds of meetings regarding the project, including the working groups formed to give the public a better understanding of the project. The working groups input resulted in project changes, which are reflected in the SDEIS. The project has been the subject of numerous newspaper articles plus radio and television spots. In addition, the eight project newsletters have each been distributed to over 10,000 people on the project mailing list.

they willing to rush to that decision when there has not been proper public notice and consequent informed feedback.

Have each of these elected representatives done any of the following:

1. Studied the BRT "Primary Corridor Trans. Project" as per the draft of the Conceptual Design Drawings, technical Appendix B. ?
2. Driven the route with the above Design draft in mind and envisioned the impact?
3. Actually spoke with most of their constituents about BRT and what is planned?
4. Know the Quality of the information provided as to ridership, demographics, and the actual costs in real (not present) dollars?
5. Know what the operational and maintenance costs of the system will be, what are the ridership projections, how good are those projections, and will low or even average ridership translate into City deficits?

There seems to be so many unanswered questions. Private property condemnations, projected ridership and supporting data of BRT, concerns of access to businesses and the consequent economic results, local traffic gridlock, etc.?

These are our highways, not the governments. We demand that the BRT be made public to everyone - especially the 92% of our population that drives automobiles. That further it is fully scrutinized by objective experts in design, operation, cost and maintenance, other than those picked by the City.

  
James D. York

5. We, the Dillingham Group, wanted to confirm that the businesses of Dillingham have no idea of what the BRT is. And I have a sampling here of about 300 signatures of businesses along the area that we took in less than two days.

Response: One of the responsibilities of the Kaithi Working Group members, of which you were a member, was to take the information from the working group meetings and share it with your associates and to bring their comments back to the working group meetings.

6. So I have wanted to state the second federal guidelines that I don't see being followed is the economic impact. And an excuse me - an EIS is mandated to continue the economic impact a transit program will have. The EIS before us doesn't do that.

Response: Economic and business impacts of the Refined LPA (BRT Alternative) are addressed in various sections of the MISDEIS, SDEIS and FEIS, including Sections 5.1, 5.2, 5.3 and 5.12.11.

7. And to demonstrate that economic impact, I wanted to personally thank the City for giving us this demo project of the BRT. And this is one lane, one direction, that's heading from Midvale Street to down to Invel. And it will be the same in the other direction. It will be the same on Ala Moana. It will be the same on Keolu. The thing is nuts. The whole idea is totally nuts.

Response: As documented in Chapter 4 of the FEIS, there will be enough people diverted out of the cars onto public transit for Dillingham Boulevard to operate effectively with one general purpose lane in each direction, plus turn lanes at major intersections. Along half of the route, the general purpose lanes will be extra wide so that stopped and right-turning vehicles will not hold up traffic behind it. Along the other half, bus turnouts will be installed so that stopped buses do not block traffic.

Because of the diversion of people from autos to transit, even with the BRT lanes, the traffic LOS along Dillingham Boulevard will be equal to or better than conditions with the No-Build Alternative. Additionally, traffic LOS on parallel streets such as N. King Street and Nimitz Highway will be equal to or in most cases better with the BRT lanes on Dillingham Boulevard than without them.

Moreover, the exclusive BRT lanes on Dillingham Boulevard will enable Dillingham Boulevard to carry 3 times the number of people that it can carry today.

8. So I just would hope that everybody could push the Council this Wednesday to take the monies, the 35 million, whatever it is, and use that portion to be spent on the Ewa section before they do the In-Town section.

Response: The In-Town BRT is proposed to proceed ahead of the Regional BRT so that SDOT widening of H-1 can be coordinated with the BRT improvements.

9. And if we do build the In-Town section first, we still have the sewers to deal with, the infrastructure, so that needs to be addressed before anything else.

Response: DTS is coordinating with other projects along the alignment in an effort to minimize the disruptions to businesses as these projects get implemented.

10. In my opinion a great majority of citizens, property owners, tenants, businesses, employees - especially those on the proposed BRT route - are not only not aware of the BRT, but certainly not aware of the serious problems that the BRT would create. I, and several other Dillingham area businessmen, personally walked several blocks of Dillingham Blvd. and talked with over 40 business owners. NOT ONE OF THESE BUSINESS OWNERS KNEW WHAT BRT WAS! We have petitions people signed that were concerned about BRT, by over 300 people available for your review.

Response: Several business owners along Dillingham Boulevard, including you participated in the Kaithi Working Group meetings. One of the stated responsibilities of the working group members was to convey the content of the meetings to others in their organization, and to bring their organizations views to share with the other working group members.

11. Many of these property owners and businesses, were concerned that that BRT calls for exclusive use of the 2 center lanes along the entire length of Dillingham Blvd. Effectively, 3 lanes out of 5 lanes total, would be unavailable to local traffic. That leaves only one lane in each direction to service Dillingham, and each of these "one" lanes would be shared by cars, local buses, and a proposed bicycle.

Response: As documented in Chapter 4 of the FEIS, there will be enough people diverted out of the cars onto public transit for Dillingham Boulevard to operate effectively with one general purpose lane in each direction, plus turn lanes at major intersections. Along half of the route, the general purpose lanes will be extra wide so that stopped and right-turning vehicles will not hold up traffic behind it. Along the other half, bus turnouts will be installed so that stopped buses do not block traffic.

Because of the diversion of people from autos to transit, even with the BRT lanes, the traffic LOS along Dillingham Boulevard will be equal to or better than conditions with the No-Build Alternative. Additionally, traffic LOS on parallel streets such as N. King Street and Nimitz Highway will be equal to or in most cases better with the BRT than without it.

Moreover, the exclusive BRT lanes on Dillingham Boulevard will enable Dillingham Boulevard to carry over 3 times the number of people that it can carry today.

12. This plan would render Dillingham Monday thru Friday to permanent gridlock for local traffic. As it is now, driving in either of the far right lanes, is extremely slow due to local bus stops.

Response: See response to comment #11.

13. A more common sense solution would be to use contra flow and HOV lanes for Dillingham for only rush hour traffic. In the morning and afternoon, allowing automobile traffic the use of those center lanes for all times other than rush hour.

Response: While contra-flow lanes, whether they be for HOV or general traffic, could improve traffic flow during peak periods, it would require the elimination of left-turns during the hours of contra-flow operation. This could have a detrimental impact on the many small businesses along Dillingham Boulevard. Also, while the directional imbalance in the A.M. peak period might allow for a contraflow lane, there is not the same imbalance by direction during the P.M. peak to permit a contraflow operation. Additionally, the benefits to BRT/transit riders would be significantly less than they would be with the Refined LPA, since travel speeds would be 40-50 percent slower.

Mr. James York  
Page 4  
November 13, 2002

14. We don't feel that the public has been fairly notified and involved in the decision making process. This is such a major issue that will dramatically impact everyone in Honolulu, that we are insisting that the City, State and Fed. Do not rush to a decision they might regret.

**Response:** The public involvement process on the PCITP has been one of the most extensive outreach efforts ever undertaken on Oahu. The outreach process started in 1989 with gathering public input to create and refine the Leisakōkō Mobility Concept Plan. Hundreds of meetings have been held where the project has been presented and discussed. Seven Progress Reports (newsletters) have been produced and sent to over 10,000 people on the project's mailing list. Also, working groups were formed in communities along the project alignment to discuss and refine the project. Public involvement has been an integral part of project development and will continue to be an important part of the project.

15. We have been told at each of the countless BRT meetings that there have been many meetings, public notices and hearings and that everything possible has been done to inform the community of the BRT. Unfortunately the reality is that vast majority of the public don't have a clue as to the reality of what is planned. And it won't be until the actual construction starts that the real community sentiment will then rear its "ugly head."

**Response:** See response to comment #14.

16. We think that if there are to be long term workable solutions that there must be compromise from both affected property owners/businesses and our representatives. And to reach those solutions all parties must first be aware of what is being discussed, which we don't think is the case. Then the dialectic and discourse can commence to hammer out viable, acceptable transportation solutions.

**Response:** See response to comment #14.

17. Aren't we trying to solve rush hour traffic? What is the agenda here? And Dillingham is just one example along the entire BRT route. What about the rest of the route and its impact?

**Response:** As shown in Chapter 4 of the FEIS, traffic conditions in general all along the alignment during the peak hours will be better with the BRT than without it.

18. We believe that the simple combination of contraflow, HOV lanes, parking innovations, use of private buses and vans, bike ways, and getting uninsured drivers off the roads would lead to much better results than the BRT.

**Response:** Comment noted.

19. Are our elected representatives willing to go on the record as those who has approved massive traffic gridlock in the Primary Corridor? Are they willing to rush to that decision when there has not been proper public notice and consequent informed feedback?

**Response:** Comment noted. See response to comment #14, above.

Mr. James York  
Page 5  
November 13, 2002

20. Have each of these elected representatives done any of the following:

a. Studied the BRT "Primary Corridor Trans. Project" as per the draft of the Conceptual Design Drawings, technical Appendix B?

b. Drive the route with the above Design draft in mind and envisioned the impact?

c. Actually spoke with most of their constituents about BRT and what is planned?

d. Know the Quality of the Information provided as to ridership, demographics, and the actual costs in real (not present) dollars?

e. Know what the operational and maintenance costs of the system will be, what are the ridership projections, how good are those projections, and will low or even average ridership translate into City deficits?

**Response:** The City Council members have been briefed on the project at each step in the process and have had access to all of the drawings, impact and financial analyses and other data needed to make informed decisions.

21. There seems to be so many unanswered questions. Private property condemnations, projected ridership and supporting data of BRT, concerns of access to businesses and the consequent economic results, local traffic gridlock, etc?

**Response:** The MIS/DEIS, SDEIS, and FEIS contain information regarding displacements and relocations (Chapter 5), ridership (Chapter 4), access to businesses (Chapter 5), and economic effects (Chapter 5).

22. These are our highways, not the governments. We demand that the BRT be made public to everyone - especially the 92% of our population that drives automobiles. That further it is fully scrutinized by objective experts in design, operation, cost and maintenance, other than those picked by the City.

**Response:** Comment noted.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Myamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

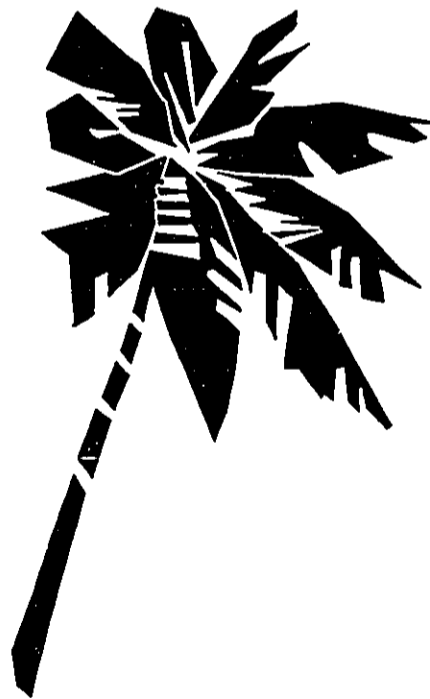


CHERYL D. SOON  
Director



**Final Environmental Impact Statement**  
**Primary Corridor Transportation Project**

**Chapter 7.0**  
**Comments and Responses**  
**Citizens**



DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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CHERYL D. SOON  
DIRECTOR  
GEORGE KECOKI MIYAMOTO  
DEPUTY DIRECTOR

JEREMY HARRIS  
MAYOR

TPD02-00530

November 13, 2002

RECEIVED  
Oct 17 1 08 PM '00  
CITY CLERK  
HONOLULU, HAWAII

Attn: Gwen, Committee Clerk

In regards to the community meeting being held Thursday Oct. 19, 2000.  
We are residents/owners at The Lele Pono (AOAO Lele Pono)

We are very much against the proposal of a bus terminal or turn around area being planned for the Kam Drive-in site and we are against the proposed on and off ramps from the H-1 Freeway for Kaonohi Street. The noise level and traffic at this intersection is already unbearable.

Thank you for your time and hearing our views.

Sincerely,  
  
Karl Adams & Mary Lou Zingalie-Adams  
Units # 1403 and #1808  
808 487-1357  
Fax 808 487-1357

Dear Mr. Adams and Ms. Adams:

Subject: Primary Corridor Transportation Project

This is in response to your October 17, 2000 letter regarding your comment on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

"We are very much against the proposal of a bus terminal or turn around area being planned for the Kam Drive-in site and we are against the proposed on and off ramps from the H-1 Freeway for Kaonohi Street. The noise level and traffic at this intersection is already unbearable."

Response: Please be advised that the transit center site at Kamehameha Drive-in and the on/off-ramp from Kaonohi Street to H-1 have been eliminated from the proposed project.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,  
  
CHERYL D. SOON  
Director

Misc. Com. No. 1255



DEPARTMENT OF TRANSPORTATION SERVICES  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE "REO" MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00531

November 13, 2002

Ms. Naomi Ahuna  
47-495 Apau Loop  
Kaneohe, Hawaii 96744

Dear Ms. Ahuna:

Subject: Primary Corridor Transportation Project

This is in response to your testimony at the April 20, 2002 Public Hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. *I'm writing or testifying in support of the Oahu Metropolitan Planning Policies Committee's approval of the City's Bus Rapid Transit Project.*

Response: We appreciate you supporting the project.

2. *For 11 years, I worked for the Island County Public Transportation Benefit area in Washington state, and I personally witnessed the effects of public transportation on people's lives. BRT will increase mobility opportunities and play a vital role in improving economic opportunities for all citizens.*

Response: We concur.

3. *BRT can decrease overall commute time, improve air quality, and increase their personal disposable income. Who wouldn't want an extra \$700 per month in their pocket? No more monthly parking fees, gasoline, car payments or car insurance.*

Response: We appreciate your insight into the benefits an individual may realize from the BRT system.

4. *The infusion of millions of dollars in Federal and City funds, coupled with additional personal income, is what the City and County of Honolulu needs to revitalize the local economy.*

Response: We concur it is a good opportunity for Honolulu to capitalize on federal funds.

5. *Even if you may not personally ride the bus or vanpool or carpool, you can still benefit from BRT. Those same folks who will use BRT may be the same patrons who can now afford to frequent you restaurants and businesses more often. I am one of those thousands of Hawaii-born young people who left the islands because of the economy in the 1980s. I'm part of the phenomenon called the brain drain.*

Response: Thank you for presenting additional project benefits.

Ms. Naomi Ahuna  
Page 2  
November 13, 2002

6. *I see BRT as a vehicle to provide employment opportunities and a mechanism to retain the best and brightest citizens of our state.*

Response: We concur.

7. *BRT has proven itself in other metropolitan cities in the United States by providing the transportation infrastructure to move people efficiently and effectively. If you don't go through with the BRT project, we have once again failed to step up to the plate and make things happen.*

Response: Again, thank you for supporting the project and taking the time to attend the public hearing and share your views.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE WESOLOSKI  
DEPUTY DIRECTOR

November 13, 2002

TPD02-00532

Mr. David Aki  
811 Middle Street  
Honolulu, Hawaii 96815-2316

Dear Mr. Aki:

Subject: Primary Corridor Transportation Project

This is in response to your April 20, 2002 Public Hearing comments regarding the Supplemental Draft Environmental Impact Statement (SDEIS).

1. *First of all, I'm an employee of TheBus Company. I've been with TheBus Company for almost two and a half decades. I've participated in two hurricanes and three floods regarding evacuating people. I'm here, basically, to learn from all of you leaders on how I'm going to make my decision on what I need to decide on. And, basically, my job as an operator is to do whatever the community wants us to do, okay.*

**Response:** We appreciate you taking the time to attend the public hearing and learn more about the proposed project.

2. *My concern is for - mostly for the seniors, okay. It's for the welfare of everybody, but especially the seniors. I'm getting older. I want the seniors to have the best, so at least when I get up there, I know I got something to look forward to.*

**Response:** The BRT will provide a transportation alternative for all Honolulu citizens.

3. *I move almost 400 people a day from four in the morning to 12 in the afternoon. At 9:54 in the morning, I move 47 people from River Street to Hotel to Bishop Street, four blocks. I'm concerned about the people that had the estimated times pertaining to how far it was going to take them from Kepohei to downtown. The key word was "estimated."*

**Response:** The estimated future travel times reflect a different method of bus operations than exists today. The BRT will be operating in the zipper lane along H-1, and with a limited number of stops in-town, often in priority lanes free from congestion, with vehicles and platforms designed to facilitate much faster passenger boarding and exiting than is possible today. With the In-Town BRT, passengers will be able to board and alight from a platform at the same height as the bus floor, and, they will be able to use any of 3 doors.

4. *I drove the route Makaha from December to March. That takes an hour and 45 minutes. Now, I believe the estimated time on the paper was 30 something minutes. I'm sure you estimated picking up people, not just driving from point A to point B. Because the elderly need a little bit*

Mr. David Aki  
Page 2  
November 13, 2002

*more time to board the buses, okay. And we need to make sure that we give a fair estimated time, okay. Because I can tell you right now, from Kaihi, Middle Street, I leave there at 9:34, I get to Mayor Wright Housing at 9:50. That will never happen.*

**Response:** See responses to comments #1 and #2.

5. *It's something they scheduled me to do. But at that time of the day, we have a lot of elderly going to the doctors, going to the shopping, Chinatown, doing their shopping, and it'll never happen. So when you give estimated times, I'd like to ask that you look at the estimated times. And if you need a fair estimate, ask a bus driver. I mean, I apologize. At least we can tell you from behind the wheel, based upon the people we work with and the people we live around, how long at least they take to get on the bus. Okay. And that's basically what I wanted to say.*

**Response:** See responses to comments #1 and #2.

6. *As far as I'm concerned, I cannot make a decision if I'm for or I'm against. But I'd like to thank you folks for allowing me to testify. Thank you.*

**Response:** Again, thank you for attending the public hearing and expressing your views.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

*Cheryl D. Soon*  
CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE "KEONI" MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00533

November 13, 2002

Mr. Ronald D. Armenoff  
88-089 Uao Place, # 2702  
Aiea, Hawaii 96701

Dear Mr. Armenoff:

Subject: Primary Corridor Transportation Project

This is in response to your testimony at the October 19, 2000 Special Transportation Committee Meeting regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. I am representing myself as a resident of the Uie Pono. I am opposing the bus terminal proposal at Kam Drive-In for the following reasons.

**Response:** The transit center site at Kamehameha Drive-In has been eliminated from consideration.

2. As was stated before, I believe the traffic congestion is only gonna get totally intolerable. At present, during the weekday evenings this traffic typically backs up Moanalua past Pali Momi and \_\_\_\_\_ up the hill to McGraw Loop Road. Also, mauka going Keonohi backs up on the left-turn lanes. Presently, weekends are even worse. Moanalua and Keonohi Streets are even busier.

**Response:** Thank you for sharing your knowledge of the local traffic conditions.

3. Where I live, to make even a turn onto Moanalua is extremely difficult during the day. This is from the Uie Pono driveway on Moanalua. I've made numerous complaints already to the HPD regarding speeders, reckless drivers and drivers who fail to yield to pedestrians. There have [been] numerous injury, auto accidents and pedestrian accidents.

**Response:** It is beyond the scope of the PCTP to address speeders, reckless drivers, and drivers who fail to yield to pedestrians.

4. I have another issue here. It's a safety issue which I have not heard brought up. Typically bus stops attract loitering. At this area, there have been numerous crimes committed already. There have been thefts, vehicle/home break-ins, assaults.

**Response:** It is beyond the scope of the PCTP to address thefts, vehicle/home break-ins and assaults that are not related to the project. The MIS/DEIS, SDEIS, and FEIS, Section 5.3 address the BRT safety and security.

Mr. Ronald D. Armenoff  
Page 2  
November 13, 2002

5. Another aspect is the business aspect. It was stated that Pearlridge would benefit by having this terminal across the street. At present, nearly all bus routes excepting those which take the freeway already have very convenient stops on Kam Highway, Moanalua, Keonohi and Pali Momi Streets adjacent to Pearlridge.

**Response:** The transit center site at Kamehameha Drive-In is no longer a part of the proposed BRT project.

6. Also, lastly, I think since there is on/off ramps in areas such as the Aloha Stadium or Kaahumanu. The Aloha Stadium, I think would be an excellent site for something like this. I don't think there would be an issue with anything such as life, noise or pollution.

**Response:** Aloha Stadium has been identified as a potential transit center/park-and-ride site. In addition, two other transit center sites along Kamehameha Highway are being considered for the Pearl City/Aiea area including a site at the former Jim Siemons Auto Dealership, and a site near Waimano Home Road between Chevron and the Pearl City Business Plaza. The Manana Bus Maintenance Facility on Waimano Home Road was evaluated as a potential transit center site, but eliminated due to insufficient space within the facility. A new BRT-exclusive ramp is being proposed because existing freeway on-ramps and off-ramps are heavily utilized. The new BRT-exclusive ramp proposed would be located near Aloha Stadium at Luspelle Drive. This ramp would be reversible, providing access directly into the Zipper Lane during the A.M. peak period and egress from the Zipper Lane to Luspelle Drive during the P.M. peak period.

7. Also, this area on the Waimano Home Road where the library where there's this current maintenance facility being constructed at present. I believe those would be much better sources.

**Response:** The concept of providing a transit center at the Manana Bus Maintenance Facility was evaluated and eliminated due to insufficient space within the facility.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

PT 11/10-5303  
RECEIVED  
TO NOV-2 1992  
PUBLIC TRANSPORT  
DIVISION

Cheryl Soon Director  
Dept. of Transportation Services  
711 Kapiolani Bl.  
Honolulu, Hawaii 96813

October 30, 2000

re: proposed Regional Transit Center at Kaonohi Street and Kam Drive-in  
Dear Cheryl,

We are opposed to Bus Terminal at the Kam Drive-in site for the following reasons:

**1. Increased traffic congestion**

- A. This proposal will only make the current traffic situation unbearable.
1. At present the proposed area has extreme congestion, which occurs frequently:
    - a. traffic typically backs-up on Moanalua Rd. (Waipahu-bound) from Kaonohi past Pali Momi Rd. and up the hill towards McGraw Pt. Rd.
    - b. Kaonohi left turn lane (mauka-bound) typically backs-up from Moanalua, down the hill towards Circuit City.
    - c. Kaonohi (makai-bound) backs-up from Moanalua up the hill towards the freeway.
  2. an extremely large number of commuters make use of the freeway on/off ramp.
  - c. weekends, and holidays are even worse.
- B. Proposed area has a local elementary school, and church in the immediate area.

**2. Safety Issue**

- A. Speeders, reckless drivers, and drivers failing to yield to pedestrians are already a frequent problem:
  1. presently there have already been numerous injury auto, and pedestrian accidents in this immediate area.
- B. Bus stops typically attract loitering, and bus-stop crime is a fairly frequent occurrence
1. Presently numerous crimes have occurred in this immediate area already:
    - a. abductions, attempted rapes, assaults, robberies and on Sept. 30th, an attempted murder of two boys at a bus stop on Kam Highway in front of Pearfridge.
    - a. Vehicle thefts, thefts from parked vehicles, homes and pedestrians are a fairly common occurrence.

**3. Business Aspect**

- A. It was stated during several past meetings that Pearfridge Center would benefit by having this transit center across the street from Pearfridge.
1. Presently nearly all current bus routes between Honolulu, and Kapolei (excepting those which bypass Aiea, by taking the freeway) already have very convenient stops at Pearfridge.
    - a. bus-stops on Kam Highway, Moanalua, Kaonohi, and Pali Momi St, adjacent to Pearfridge already exist.

continued...

**4. Conclusion**

- A. Other acceptable sites are available where freeway on/off-ramps already exist, and congestion, pollution, lights, and noise would not pose a problem.
1. Aloha Stadium
  2. Waimanalo Home Rd.
    - a. a bus maintenance facility is at present under construction already.
- B. The City and State would do well to avoid the expensive additional millions of dollars by using an area with an already existing on/off ramp.

Sincerely,

*Renelle G. Gifford*  
*Jonji Taylor*

Renelle G. Gifford  
Jonji Taylor  
Patricia J. Ho  
98-1451 Kanohi St  
Aiea, Hawaii 96701

Patricia J. Ho  
98-1451 Kanohi St  
Aiea, Hawaii 96701

Jonji Taylor  
Tonia Taylor  
P.O. Box 1968/ 98-099 Uao Pt. #2702  
Aiea, Hawaii 96701  
(808) 488-3052

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE YECOHU MIYAMOTO  
DEPUTY DIRECTOR

TPD 11/00-05303R

November 13, 2002

Mr. Ronald D. Armenoff and  
Ms. Tonia Taylor  
98-059 Uao Place, #2702  
Aiea, Hawaii 96701

Dear Mr. Armenoff and Ms. Taylor:

Subject: Primary Corridor Transportation Project

This is in response to your October 30, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. We are opposed to Bus Terminal at the Kam Drive-in site for the following reasons.

Response: A series of meetings were held with the Pearl City-Aiea Working Group. Participants in this group represented a cross-section of interests in the area. Based on discussions in the working group, a revised transit plan was developed that eliminated the bus ramps at Kaonohi Overpass and relocated and split the transit center formerly proposed at Kamehameha Drive-in into two smaller transit centers located along Kamehameha Highway at the former Jim Siemons auto dealership site and at Aloha Stadium. A third transit center site may be provided at the site near Hale Mohala. Contra-flow HOV lanes on Kamehameha Highway are also being considered. Local bus service on Kamehameha Highway will be maintained.

2. This proposal will only make the current traffic situation unbearable. At present the proposed area has extreme congestion, which occurs frequently. Traffic typically backs up on Moanalua Rd. (Waipahu-bound) from Kaonohi past Pali Momi Rd. and up the hill towards McGraw Pl. Rd. Kaonohi left turn lane (mauka-bound) typically backs up from Moanalua, down the hill toward Circuit City. Kaonohi (makai-bound) backs up from Moanalua up the hill towards the freeway. This is the immediate area of the proposed Zipper-Lane on/off ramp. An extremely large number of commuters make use of the freeway would be affected. Weekends, and holidays are even worse.

Response: See response to comment #1.

3. Proposed area has a local elementary school, and church in the immediate area.

Response: If you are referring to the proximity of Kamehameha Drive-in to area schools and churches, the transit center site at Kamehameha Drive-in has been eliminated from consideration.

4. Speeders, reckless drivers, and drivers failing to yield to pedestrians are already a frequent problem. Presently there have already been numerous injury auto, and pedestrian accidents in this immediate area.

Response: See response to comment #1.

Mr. Ronald D. Armenoff and  
Ms. Tonia Taylor  
Page 2  
November 13, 2002

5. Bus stops typically attract loitering, and bus-stop crime is a fairly frequent occurrence. Presently numerous crimes have occurred in this immediate area already: abductions, attempted rapes, assaults, robberies and on Sept. 30th, an attempted murder of two boys at a bus stop on Kam Highway in Pearisridge. Vehicle thefts, thefts from parked vehicles, homes and pedestrians are a fairly common occurrence.

Response: See response to comment #1.

System security will be provided to protect the public and the transit system from crime and vandalism. A comprehensive System Security Plan will be prepared during the final design phase to address passenger security, employee security, revenue security, vandalism, theft, crowd control, power/mechanical failures, fires, accidents, and other incidents. Security may include a combination of on-site personnel, special transit police, local police, video surveillance, and physical design features.

6. It was stated during several past meetings that Pearisridge Center would benefit by having this transit center across the street from Pearisridge. Presently nearly all current bus routes between Honolulu, and Kapolei (excepting those which bypass Aiea, by taking the freeway) already have very convenient stops at Pearisridge. Bus stops on Kam Highway, Moanalua, Kaonohi, and Pali Momi St., adjacent to Pearisridge already exist.

Response: See response to comment #1.

7. Other acceptable sites are available where freeway on/off-ramps already exist, and congestion, pollution, lights and noise would not pose a problem: 1. Aloha Stadium 2. Waimanalo Home Rd. (a bus maintenance facility is presently under construction already.) The City and State would do well serving the taxpayers additional millions of dollars by using an area with an already pre-existing on/off ramp. The City and State would do well saving the taxpayers additional millions of dollars by using an area with an already pre-existing on/off ramp.

Response: Aloha Stadium has been identified as a potential transit center/park-and-ride site. In addition, two other transit center sites along Kamehameha Highway are being considered for the Pearl City/Aiea area including a site at the former Jim Siemons Auto Dealership and a site near Waimano Home Road between Chevron and the Pearl City Business Plaza. The Manana Bus Maintenance Facility on Waimano Home Road was evaluated as a potential transit center site and eliminated due to insufficient space within the facility. A new BRT-exclusive ramp is being proposed because the existing freeway on-ramps and off-ramps are heavily utilized. The new BRT-exclusive ramp proposed would be located near Aloha Stadium at Luapele Drive. This ramp would be reversible providing access directly into the Zipper Lane during the A.M. Peak Period and egress from the Zipper Lane to Luapele Drive during the P.M. Peak Period.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

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JEREMY HARRIS  
MAYOR

Ms. Patricia J. Ho  
Page 2  
November 13, 2002

CHERYL D. SOON  
DIRECTOR

GEORGE WEDU • MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00575

November 13, 2002

Ms. Patricia J. Ho  
98-1451 Kaonohi Street  
Aiea, Hawaii 96701

Dear Ms. Ho:

Subject: Primary Corridor Transportation Project

This is in response to your October 30, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. We are opposed to Bus Terminal at the Kam Drive-in site for the following reasons.

**Response:** The transit center site at Kamehameha Drive-In has been eliminated from consideration.

2. This proposal will only make the current traffic situation unbearable. At present the proposed area has extreme congestion, which occurs frequently. Traffic typically backs up on Moanalua Rd. (Waipahu-bound) from Kaonohi past Pali Momi Rd. and up the hill towards McGrew Pl. Rd. Kaonohi left turn lane (mauka-bound) typically backs up from Moanalua, down the hill toward Circuit City. Kaonohi (makai-bound) backs up from Zipper-Lane on/off ramp. An extremely large number of commuters mauka of the freeway would be affected. Weekends, and holidays are even worse.

**Response:** The transit center site at Kamehameha Drive-In and the on/off-ramp from Kaonohi Street to H-1 have been eliminated from consideration.

3. Proposed area has a local elementary school, and church in the immediate area.

**Response:** If you are referring to the proximity of Kamehameha Drive-In to area schools and churches. The transit center site at Kamehameha Drive-In has been eliminated from consideration.

4. Speeders, reckless drivers, and drivers failing to yield to pedestrians are already a frequent problem. Presently there have already been numerous injury auto, and pedestrian accidents in this immediate area.

**Response:** The transit center site at Kamehameha Drive-In and the on/off-ramp from Kaonohi Street to H-1 have been eliminated from consideration.

5. Bus stops typically attract loitering, and bus-stop crime is a fairly frequent occurrence. Presently numerous crimes have occurred in this immediate area already: abductions, attempted rapes, assaults, robberies and on Sept. 30th, an attempted murder of two boys at a bus stop on Kam Highway in Pearlridge. Vehicle thefts, thefts from parked vehicles, homes and pedestrians are a fairly common occurrence.

**Response:** The transit center site at Kamehameha Drive-In has been eliminated from consideration. However, a transit center at the former Jim Stemons auto dealership site is being proposed.

System security will be provided to protect the public and the transit system from crime and vandalism. A comprehensive System Security Plan will be prepared during the final design phase to address passenger security, employee security, revenue security, vandalism, theft, crowd control, power/mechanical failures, fires, accidents, and other incidents. Security may include a combination of on-site personnel, special transit police, local police, video surveillance, and physical design features.

6. It was stated during several past meetings that Pearlridge Center would benefit by having this transit center across the street from Pearlridge. Presently nearly all current bus routes between Honolulu, and Keolu (excepting those which bypass Aiea, by taking the freeway) already have very convenient stops at Pearlridge. Bus-stops on Kam highway, Moanalua, Kaonohi, and Pali Momi St., adjacent to Pearlridge already exist.

**Response:** A series of meetings was held with the Pearl City-Aiea working group. Participants in this group represented a cross-section of interests in the area. Based on discussions in the working group, a revised transit plan was developed that eliminated the bus ramps at Kaonohi Overpass and relocated and split the transit center formerly proposed at Kam Drive-In into two smaller transit centers located along Kamehameha Highway at the former Jim Stemons Auto Dealership site and at Aloha Stadium. A third transit center site may be provided at the site near Hale Mohalu. Contraflow lanes on Kamehameha Highway would provide transit priority with freeway access from Salt Lake Boulevard to H-1. Local bus service on Kamehameha Highway will be maintained.

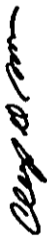
7. Other acceptable sites are available where freeway on/off-ramps already exist, and congestion, pollution, lights and noise would not pose a problem: 1. Aloha Stadium 2. Waimanalo Home Rd. (a bus maintenance facility is presently under construction already.) The City and State would do well saving the taxpayers additional millions of dollars by using an area with an already pre-existing on/off ramp. The City and State would do well saving the taxpayers additional millions of dollars by using an area with an already pre-existing on/off ramp.

Ms. Patricia J. Ho  
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November 13, 2002

Response: a) Aloha Stadium has been identified as a potential transit center/park-and-ride site. In addition, two other transit center sites along Kamehameha Highway are being considered for the Pearl City/Aiea area including a site at the former Jim Siemons Auto Dealership and a site near Waimano Home Road between Chevron and the Pearl City Business Plaza. The Manana Bus Maintenance Facility on Waimano Home Road was evaluated as a potential transit center site and eliminated due to insufficient space within the facility. A new BRT-exclusive ramp is being proposed because the existing freeway on-ramps and off-ramps are heavily utilized. The new BRT-exclusive ramp proposed would be located near Aloha Stadium at Luapele Drive. This ramp would be reversible providing access directly into the Zipper Lane during the A.M. Peak Period and egress from the Zipper Lane to Luapele Drive during the P.M. Peak Period.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE WICKI MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00534

November 13, 2002

Mr. David Alkin  
2168 Ahaku Place  
Honolulu, Hawaii 96821

Dear Mr. Alkin:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, 2002 Public Hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. Good afternoon, and thank you for listening to my testimony. I'm speaking today just representing my own personal views.

Like it or not, there will be growth. Like it or not, there will be increase in travel demand. Like it or not, there will not be an increase in roads in the urban area. Therefore, there will be an increase in congestion.

Response: This comment is consistent with the FEIS findings.

2. What are we to do? We need to provide an attractive alternative to travel without having to drag two tons of metal with you wherever you go. The only way to do this is to enhance the travel times delivered by public transit and to enhance the public transit experience. The BRT system will do this.

Response: We concur.

3. I have a friend who says that the middle class people won't ride buses. I lived on the mainland most of my life and middle class people do ride buses when they provide travel time savings and decrease the stress of sitting in traffic.

Response: Comment noted.

4. Plus, as a society, we need to consider those among us who are dependent on public transit for their mobility: The elderly, the young, the handicapped, and those who can't afford private automobiles. We have an obligation to meet their mobility needs. And as the average age of the population increases, a high quality public transit system becomes ever more important.

Response: This comment is consistent with the FEIS findings.

Mr. David Alkin  
Page 2  
November 7, 2002

5. *The system must include a firm and irrevocable commitment to mitigate its adverse environmental impacts. We live here, and we are a tourist destination. We will lose tourism if we don't maintain the qualities that make us a tourist destination. We need to be willing to pay the additional costs to fully mitigate our adverse environmental impacts.*

**Response:** DTS has been vigilant in identifying the potential environmental impacts of the proposed project. The costs of various mitigation measures are being incorporated into the project costs.

6. *What will happen if we do not do this? The cost of the system that will ultimately be implemented will increase. The benefits of implementing the system now will be lost. The amount of federal funding available to Honolulu will decrease. There will never be the perfect system. We have to make the beginning now.*

**Response:** This comment is consistent with the FEIS findings.

7. *I have been in many cities with modern transit. The people in those cities have come to rely heavily on their systems. They're expanding their systems. Visitors can't believe we don't already have LRT or BRT. Mainland cities will be happy to spend the federal funds that we will be spurning if we don't go forward.*

**Response:** Comment noted.

8. *BRT will also help us kick our oil addiction. By eventually using electric buses, with the electricity produced from renewable resources, we will be able to displace oil and replace our dependence on the politics of the Middle East.*

**Response:** Comment noted. DTS does not dispute this statement.

9. *Over the long term, transportation improvements improve the quality of life for everyone directly and indirectly. H-3 has shown us.*

**Response:** Comment noted. DTS does not dispute this statement.

10. *The near-term adverse environmental impacts need to be mitigated, but we must not let the fear of the adverse impacts paralyze us into immobility and ultimate gridlock. That will decrease the quality of life for us all.*

**Response:** Statement/Observation not requiring response.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

  
CHERYL D. SOON  
Director

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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
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GEORGE KEOH  
DEPUTY DIRECTOR

TPD02-00535

November 13, 2002

Ms. Eila Auliy  
1039 Kelauike Street, Apt. A304  
Honolulu, Hawaii 96817

Dear Ms. Auliy:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the October 12, 2000 formal Public Hearing and at the October 26, 2000 Special Transportation Committee meeting regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. *My family has pacemakers. Other people have family that has pacemakers. If those are going to effect - I know the microwave does affect them. Are these things going to affect?*

**Response:** With the STREAM form of embedded plate technology, the electrical conductor is insulated under the ground and there should be no harmful effects. However, there is a magnetic zone around the vehicle of 5 Gauss which could impact a Pacemaker. Any system before it is accepted for revenue service will be tested to determine if the magnetic zone is detectable on and near the vehicles. The manufacturer will need to develop a method to insulate passengers from electromagnetic impacts.

2. *What I'm saying is that this island is so small. Why do they need this kind of thing that go around? They're not big like Japan, the mainland.*

**Response:** The primary transportation corridor is over 25 miles long. Among many other benefits the proposed BRT system will save people over 78,000 hours of delay daily, while reducing air pollution and energy consumption.

3. *I don't go for this electrical bus because for one thing I have family who has pacemaker and they cannot be near to a microwave. Okay. And they are going to put this thing on the road, under the ground. Okay. Weiki, Ala Moana and what not end Kakaako. Already the pipes are broken.*

**Response:** We don't like the people in the mainland. We dress different. We walk slipper. What you folks wanna do? Cook us. We already papa'a. We no need get more burnt. Because I'm worried about my family and I know some of these people out here has family and has that. So, I'm just thinking. I want answers. What you folks want? Papa'a us? We already papa'a.

**Response:** See response to comment #1.



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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE 'KEOKU' MIYAMOTO  
DEPUTY DIRECTOR

Sincerely,

CHERYL D. SOON  
Director

November 13, 2002  
TPD02-00536

Ms. Ella Aubry  
Page 2  
November 13, 2002

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Mr. Gary Bautista  
c/o Advance TA Payday  
94-210 Hanawai Circle  
Waipahu, Hawaii 96797

Dear Mr. Bautista:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the October 19, 2000 Special Transportation Committee Meeting regarding your comment on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

*"I'm actually from Ewa. I missed the Kapoela meeting. My question is about North/South Road. Director said that it is committed. However, a lot of the residents from that area say this is not tied into the North/South Road. They cannot see it and the map that it is tied in. Is it tied in?"*

Response: The North-South Road project per se is not a part of the Primary Corridor Transportation Project although a park-and-ride is proposed at the intersection of North-South Road and the H-1 freeway.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director



DEPARTMENT OF TRANSPORTATION SERVICES

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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE NEDO • MIYAMOTO  
DEPUTY DIRECTOR

TP D02-00537

November 13, 2002

Mr. Kent Bennett  
1323 Hala Drive  
Honolulu, Hawaii 96817

Dear Mr. Bennett:

Subject: Primary Corridor Transportation Project

This responds to your oral testimonies regarding the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS). You testified at the October 5, October 26, 2000 and November 14, 2000 Special Transportation Committee Meetings and at the October 12, 2000 Public Hearing. Your testimonies provided us with the following comments for which we have prepared responses.

1. *I think the Department of Transportation Services would have proposed an elevated busway above the Nimitz Highway connecting the downtown area to the H-1 Freeway viaduct at Middle Street if this had not already been emotionally rejected by the Kalia community leaders. Barring going around or under Kalia, the City was stuck with going through Kalia with all the inevitable problems.*

**Response:** At the outset of the project, attendees at public meetings indicated that elevated guideway solutions were not acceptable. By working with community representatives and business people from Kalia, solutions have been developed along Dillingham Boulevard that give priority to BRT vehicles, maintain access to businesses, and allow for sidewalk and streetscape improvements.

2. *Kalihi Kai posed a special problem because it is a commercial/industrial area. Being restricted to the right lane on each side of Dillingham Boulevard because of the two exclusive transitway lanes in the middle, poses a problem for many commercial-size vehicles. Many of these commercial vehicles will not be able to turn right onto Dillingham because the turn from right lane to right lane is too sharp or narrow. For the same reason, these vehicles will not be able to make right turns into or out of narrow driveways facing Dillingham. Mid block, left turns across the exclusive transitway lanes will be prohibited making access to these driveways impossible.*

**Response:** The proposed cross-section for Dillingham Boulevard is two exclusive transit lanes and two 16-foot wide traffic lanes. Wider traffic lanes will enable most trucks to turn into and out of driveways. Because transit lanes will be delineated with raised pavement markings, it will be possible for trucks to intrude into the transit lanes when necessary to complete a difficult turn. Alternative access routes have been identified for many parcels along Dillingham Boulevard, and improvements are proposed to make these routes more usable, such as signalization of intersections where they cross major roadways.

Mr. Kent Bennett  
Page 2  
November 13, 2002

3. *Of course, cutting the roadway capacity in half is going to cause congestions for local and commercial traffic.*

**Response:** Updated transportation analyses in the FEIS show that with full implementation of the Refined LPA, there will be a significant mode shift on Dillingham Boulevard and roadways parallel to it. This shift of person travel from auto to transit along with capacity enhancements to Nimitz Highway planned by the HDOT will allow Dillingham Boulevard to operate at traffic service levels comparable to the No-Build and TSM Alternatives even with fewer general purpose traffic lanes. This analysis is included in Chapter 4 of the FEIS.

4. *With the BRT in place, all riders in Kalihi Kai will have to walk down to the Dillingham Shopping Plaza to catch it as this is the only planned stop for all of Kalihi Kai. It is not feasible to also continue the regular buses as they would block the only vehicle lane at each stop. Additional BRT stops would take the rapid out of Rapid Transit.*

**Response:** Local transit service on Dillingham Boulevard will be maintained, thereby providing convenient transit access for those choosing not to utilize the BRT stops at McNail Street and Alakawa Street. To accommodate local transit service without blocking traffic lanes, 18-foot wide lanes are proposed on Dillingham Boulevard, Ewa of Waialam Road. Koko Head of Waialam Road, bus pullouts will be provided so that local transit can pull out of the way of vehicular traffic.

5. *Leeward commuters would also be better off zipping all the way to town on an elevated busway than stopping at Middle Street transit center and taking the time to transfer to the BRT which will have scheduled stops as well as a couple red lights along the route. From what I have seen, the State has spent much more time and money on the elevated busway than the City has spent studying the Dillingham alignment for the BRT.*

**Response:** The BRT operations plan has been refined to permit many of the regional buses to continue into town using the In-Town BRT bus lanes rather than turning back at Middle Street and forcing passengers to transfer. This will make for a speedier one-vehicle trip for many riders. The BRT, being at-grade on Dillingham Boulevard, will allow residents of Kalihi to use the system and for businesses along Dillingham Boulevard to market to BRT riders. An elevated busway on Nimitz Highway would not benefit the Kalihi community.

6. *So, for those who say we should get going on something. I say just substitute the elevated busway for the BRT down the middle of Dillingham Boulevard and get a move on.*

**Response:** An elevated busway on Nimitz Highway was opposed by the Kalihi community in the past.

7. *One, the BRT will have only one transit stop for all of Kalihi-Kai, and other buses would block the only vehicular lane provided.*

**Response:** Local transit service on Dillingham Boulevard will be maintained, thereby providing convenient transit access for those choosing not to utilize the BRT stops at McNail Street and Alakawa Street. To accommodate local transit service without blocking traffic lanes, 18-foot wide lanes are proposed on Dillingham Boulevard, Ewa of Waialam Road. Koko Head of Waialam Road, bus pullouts will be provided so that local transit can pull out of the way of vehicular traffic.

8. Two, banning mid-block left turns and not allowing trucks which have a large turning radius into the exclusive transit lanes will make some pickups and deliveries impossible.

**Response:** The proposed cross-section for Dillingham Boulevard is two exclusive transit lanes and two 16-foot wide traffic lanes. Wider traffic lanes will enable most trucks to turn into and out of driveways. Because transit lanes will be delineated with raised pavement markings, it will be possible for trucks to intrude into the transit lanes when necessary to complete a difficult turn. Alternative access routes have been identified for many parcels along Dillingham Boulevard, and improvements are proposed to make these routes more usable, such as signalization of intersections where they cross major roadways.

9. However, to see the forest for the trees, we know there will always be problems if rapid transit and local traffic are on the same grade level.

**Response:** Grade-separated transit would provide the highest level of transit service. Even then, it is not without impacts at ground level and is much more expensive than at-grade transit. Because of the high cost and visual impacts, elevated transit was eliminated by the City Council as an option early on in the PCTP.

10. KailiH will have to give in to all kinds of problems that we don't perceive now before the BRT is completed. However, even after the BRT has been running for a year, KailiH will probably have to yield even more. If ridership is too low on the BRT because of too many stops, traffic signals will probably be yanked at Dillingham and less-traveled cross streets, allowing right turns only after stopping at a stop sign. Of course, this would cause even more detours and further congestion at the remaining cross signals.

**Response:** The Refined LPA maintains existing traffic signals along Dillingham Boulevard. Because these are existing signals, they do not depend on the BRT.

11. It is clear to me that the State's elevated busway over Nimitz Highway is much better for KailiH than the BRT down on Dillingham, and I am sure Leeward commuters would rather zip all the way to a downtown transit center in KailiH. We have had double-deckers for many years now. What business, industry, jogger or biker is complaining about the double-decker that is already in place?

**Response:** An elevated busway on Nimitz Highway could be compatible with the BRT concept. The Refined LPA is designed to provide expedited intra-urban transit service as well as service between suburban and the urban area. As such, it needs to have transit stops that can be accessed by foot; hence the Dillingham corridor. It is envisioned that as part of the overall transit system, many peak period express buses will be maintained. These do not stop between the suburban areas and their urban destinations. These could be potential candidates to utilize an elevated busway on Nimitz Highway should that project proceed. It should be noted however that an elevated busway on Nimitz Highway is not part of the current OMPD TOP 2025 transportation plan for Oahu.

12. Taking away the two middle lanes of Dillingham Boulevard for the Bus Rapid Transit is an obvious win/lose type of solution. Because the Bus Rapid Transit would be competing with KailiH Kai commercial, industrial and personal traffic for signal time, road space and convenience.

**Response:** The proposed configuration of Dillingham Boulevard provides a balance between the need for expedited transit and the need for auto and truck access and circulation. Chapter 4 of the FEIS fully discusses the consequences of converting two general purpose lanes on Dillingham Boulevard to priority use by transit vehicles.

When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

13. The insidious nature of this win/lose solution surfaces after the major investment has been made. Because then, the Bus Rapid Transit must be the winner. If the Rapid Transit is under-performing, verbal concessions to the community may have to be retracted and the community may have to sacrifice even more. For example, if local traffic is banned from crossing Dillingham or making left turns onto Dillingham at less traveled intersections, the Rapid Transit would win by not having to stop at these intersections. The loss of the local traffic would be more inconvenience and further congestion at the already congested intersections. Most people would agree that a win/lose type of solution should be avoided, if possible. And in KailiH Kai that is possible.

**Response:** Comment noted.

14. An elevated busway above Nimitz Highway connecting the downtown area to the H-1 viaduct at Middle Street is a win/win solution because both local traffic and through traffic win by being separated from each other. With increased road space, convenience and signal time for the local traffic.

**Response:** See response to comment #6.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
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JEREMY HARRIS  
Mayor

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GEORGE 'KEOKI' MIYAMOTO  
DEPUTY DIRECTOR

TPD002-00538

November 13, 2002

Ms. Martha Black  
1314 Kalakaua Avenue, Apt. 606  
Honolulu, Hawaii 96826

Dear Ms. Black:

Subject: Primary Corridor Transportation Project

This is in response to your testimony at the October 26, 2000 Special Transportation Committee Meeting regarding your comment on the MISDEIS.

*"I hate to see building and construction added to whatever we have. I hate to see the views impeded. I hate to see the natural look of the environment and the views of the mountains changed. But if we can do it with ground transit and have ways to get up into the small communities I think that would be great. But I do think we do need some kind of a transportation solution."*

**Response:** The Bus Rapid Transit (BRT) Alternative will involve constructing transit centers and reconstruction of some of the roadways. The BRT would not impede any of Oahu's views because the vehicles do not require overhead wires. The BRT will operate on existing roadways. Circulator bus routes would provide access from transit centers into neighborhoods and commercial districts and feed the In-Town BRT system.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

RECEIVED  
Nov 14 10 09 AM '00  
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HONOLULU, HAWAII

Testimony  
Resolution 00-249  
Transportation Committee Meeting  
November 14, 2000

Chairman Bainum  
Members of the Committee

What goes around, comes around.

In my lifetime, I have seen the horse and buggy go by the wayside and the electric car displaced by the gas guzzling automobile. I have seen the city streetcar come and go and the inter-urban system's demise. I have seen the growth of the bus as a primary method of transportation

I grew up with a Franklin Touring Car as my secondary method of transportation. The primary mode was the streetcar. Our family outings were Sunday in our 7 passenger automobile.

In my lifetime, I have enjoyed the Chicago "El" as a means of getting to work. I have used the subway systems in New York, Washington D.C. and Hong Kong. I have used the People Mover in Denver and the Hub and Spoke system into the neighborhoods of Kowloon.

We are now considering a public transportation system capable of handling the growth of our island. Nothing has really changed in my lifetime. We are talking of electric/gas vehicles, rights of way and high capacity buses. The automobile is still in and the horse and buggy is still out.

The immediate approval and rapid implementation of the Primary Corridor Transportation System becomes a necessity to alleviate the future movement of people and traffic on our island.

What goes around comes around.

1717 Ala Wai Boulevard  
Honolulu, HI. 96815

Misc. Com. No. 1349

DEPARTMENT OF TRANSPORTATION SERVICES  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE WEEOKI MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00539

November 13, 2002

The Family of Sam Bren  
1717 Ala Wai Boulevard  
Honolulu, Hawaii 96815

Dear Bren Family:

Subject: Primary Corridor Transportation Project

This responds to Sam Bren's comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to his testimony at the October 5, 2000 Special Transportation Committee Meeting, his testimony at the November 14, 2000 Special Transportation Committee Meeting, and his November 14, 2000 letter regarding the MIS/DEIS. Part B responds to his oral testimony at the April 20, 2002 public hearing regarding the SDEIS.

Part A - MIS/DEIS Comments

1. In other words, I'm saying this, if we don't build a complete system that's adequate today for the year 2010 or 2025, we're only kidding ourselves.

Response: The BRT Alternative is designed to accommodate transportation needs up to the year 2025.

2. As far as the circulator route through Waikiki is concerned, it certainly is an advantage. I have said for a long time that the faster we get buses back on Kalakaua Avenue the better off it's going to be because certainly that was the intent and purpose when we took them off to get them back on as quick as possible. I don't want to wait until the year 2010 to get them on.

Response: The Bus Rapid Transit (BRT) will operate on Kalakaua and Kuhio Avenues.

3. Moving the buses going Diamond Head on Kalakaua Avenue is certainly the intent and purpose. As far as the in-town is concerned, the morning traffic that would put all the employees closer to their hotels. It will also provide a circulating system that I think would make a lot more sense not only to residents but to the visitors. Because if I'm going down...I can always ride all the way down Kalakaua Avenue and back Kuhio on a circulator system. If I were a visitor in town, they tell me that I have to walk from Kalakaua Avenue to Kuhio Avenue to catch a bus going in either direction is rather a ridiculous situation. I think that this is wise. Not only would it improve Kuhio but it will certainly enhance Kalakaua Avenue.

Response: The Bus Rapid Transit (BRT) will operate on Kalakaua and Kuhio Avenues.

The Family of Sam Bren  
Page 2  
November 13, 2002

4. Moving the buses going Diamond Head on Kalakaua Avenue is certainly the intent and purpose. As far as the in-town is concerned, the morning traffic that would put all the employees closer to their hotels. It will also provide a circulating system that I think would make a lot more sense not only to residents but to the visitors. Because if I'm going down...I can always ride all the way down Kalakaua Avenue and back Kuhio on a circulator system. If I were a visitor in town, they tell me that I have to walk from Kalakaua Avenue to Kuhio Avenue to catch a bus going in either direction is rather a ridiculous situation. I think that this is wise. Not only would it improve Kuhio but it will certainly enhance Kalakaua Avenue.

Response: The Bus Rapid Transit (BRT) will operate on Kalakaua and Kuhio Avenues.

5. The immediate approval and rapid implementation of the Primary Corridor Transportation System becomes a necessity to alleviate the future movement of people and traffic on our island.

Response: We appreciate his support of the project.

Part B - SDEIS Comments

6. I also don't agree with some of the misinformation that's been going out relating to the rapid transit system.

Response: We appreciate his support of the project.

7. I grew up in a city that started with 900,000 people. I left when there was 15 million. When you want to talk about traffic, don't think about today. We have a jam of traffic today. But take yourself down the line a few years when we have another hundred thousand residents living on our island. We have families that have three and four children that are going to want automobiles. And all of a sudden, our automobile traffic actually would double.

Response: To accommodate future growth, the Refined LPA offers a choice so that the future population will not be as auto dependent as they would be without it.

8. On the other side of the coin, senior citizens do need a basis of transportation. And, unfortunately, the bus system seems to be the universal way that seniors can get around. So don't look at today. Yes, today is today. But when you look down four or five or six or eight or ten years, think about what will be. So Honolulu has two ways to go, either up or out. And, unfortunately or fortunately, it's going up, and it will continue to go up. And once it goes up, we will definitely need what is being planned for today.

Response: The BRT will provide Honolulu citizens another transportation mode to choose from for trips.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

untouched. So please clarify the status of these trees and identify the mitigation measures to be taken if these trees are to now be impacted, and again if there is no "mitigation plan" can the Mid-Town/University Working Group be reactivated to address this issue? I find the possible loss of these trees unacceptable.

I thank you for the opportunity to submit these comments and concerns, and understand that they will be included and appropriately analyzed in the forthcoming Final EIS.

Sincerely,  
*Jeb P. Brown*  
Jeb P. Brown

cc: Office of Environmental Quality Control

Jeb P. Brown  
509 University Ave., Apt. 804  
Honolulu, Hawaii 96826-5008

April 5, 2002

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
650 S. King Street, 3rd Floor  
Honolulu, Hawaii 96813

Comments on Primary Corridor Transportation Project SDEIS

Dear Ms. Soon:

I would like to thank you for the opportunity to offer my comments regarding the Supplemental Draft Environmental Impact Statement (SDEIS) for the Primary Corridor Transportation Project. I offer my comments and concerns in my individual capacity only, not as a member of the McCully-Moiliili Neighborhood Board No. 8 or as a Mid-Town/University Working Group member.

I have reviewed the SDEIS completely and I concur with the document as written and support the project as proposed. However, I raise the following concerns regarding the project that I would like to have addressed or clarified.

- (1) The removal of 269 on-street parking spaces in the McCully-Moiliili neighborhood along South King Street, Pensacola Street, Kapiolani Boulevard and University Avenue (See p. 4-24 & 4-25; a total of 296 on-street parking spaces are to be removed as a result of the University Branch of the In-Town BRT systems proposed alignment.) Is there a proposed "mitigation plan" in place to replace these parking spaces with new facilities within the community? And if there is no such plan, can the Mid-Town/University Working Group be reactivated in order to address this issue and any other community issues to come to a "workable and reasonable solution" to the issues raised?
- (2) It is news to me as a member of the Mid-Town/University Working Group that there will be street tree impacts to McCully-Moiliili on the University Avenue segment from Kapiolani Boulevard to South King Street that will result in the possible loss of the "Shower Trees" planted in the median of this segment. As I remember from our working group meetings these trees were to be left untouched and in place. And as for the Monkeypod Trees on Kapiolani Boulevard, it is my recollection from our working group meetings that these trees were also going to be left

DEPARTMENT OF TRANSPORTATION SERVICES  
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CHERYL D. SOON  
DIRECTOR  
GEORGE YEKOKI MIYAMOTO  
DEPUTY DIRECTOR

TPD402-01336R

November 13, 2002

Mr. Jeb P. Brown  
509 University Avenue, Apt. 804  
Honolulu, Hawaii 96826

Dear Mr. Brown:

Subject: Primary Corridor Transportation Project

This is in response to your April 5, 2002 letter and your testimony at the April 20, 2002 public hearing regarding comments on the SDEIS.

1. I have reviewed the SDEIS completely and I concur with the document as written and support the project as proposed. However, I raise the following concerns regarding the project that I would like to have addressed or clarified.

**Response:** Thank you for reviewing the SDEIS. We appreciate your support of the project.

2. The removal of 269 on-street parking spaces in the McCully-Moiliili neighborhood along South King Street, Pensacola Street, Kapiolani Boulevard and University Avenue (see p. 4-24 & 4-25; a total of 296 on-street parking spaces are to be removed as a result of the University Branch of the In-Town BRT systems proposed alignment). Is there a proposed "mitigation plan" in place to replace these parking spaces with new facilities within the community? And if there is no such plan, can the Mid-Town/University Working Group be reactivated in order to address this issue and any other community issues to come to a "workable and reasonable solution" to the issues raised?

**Response:** The 269 spaces cited in your letter appear to be a reference to the 269 unrestricted spaces affected by the King Street portion of the TSM Alternative only, as reported on page 4-24 of the SDEIS, and not to the impacts of the In-Town BRT, discussed on page 4-25 of the SDEIS. The SDEIS reported that the Refined BRT Alternative (now the Refined LPA) would affect 379 restricted spaces and 533 unrestricted spaces. Of that total the University Branch of the In-Town BRT would affect 199 restricted spaces and 343 unrestricted spaces.

However, the Final EIS will report that further analysis and refinements to the parking impacts indicate that the TSM alternative would affect only 166 spaces, all located on King Street and Beretania Street. Under the Refined LPA, the In-Town BRT will affect a total of 373 unrestricted and 533 restricted parking spaces. Of that total, 199 unrestricted spaces and 343 restricted spaces will be affected along the University Branch. See Section 4.5.2 of the FEIS for more detail about the parking impacts of the TSM and Refined LPA Alternatives.

Mr. Jeb P. Brown  
Page 2  
November 13, 2002

As discussed in Section 4.3, in areas where a large concentration of parking spaces will be affected, replacement parking in new off-street parking facilities will be considered, but only if they meet other livable community objectives and are the result of community-based planning.

3. It is news to me as a member of the Mid-Town/University Working Group that there will be street tree impacts to McCully-Moiliili on the University Avenue segment from Kapiolani Boulevard to South King Street that will result in the possible loss of the "Shower Trees" planted in the median of this segment. As I remember from our working group meetings these trees were to be left untouched and in place. And as for the Monkeypod Trees on Kapiolani Boulevard, it is my recollection from our working group meetings that these trees were also going to be left untouched. So please clarify the status of these trees and identify the mitigation measures to be taken if these trees are to now be impacted. And again, if there is no "mitigation plan" can the Mid-Town/University Working Group be reactivated to address this issue? I find the possible loss of these trees unacceptable.

**Response:** Mitigation has been proposed for all trees affected by the project. The mitigation will consist of relocation on-site, relocation off-site, or removal/replacement in the case of trees that are not in good condition for transplanting. Section 5.7 of the FEIS addresses this issue in greater detail.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6978. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE 'KEOKI' MIYAMOTO  
DEPUTY DIRECTOR

TPD002-00540

November 13, 2002

RECEIVED  
Oct 18 2 53 PM '00  
CITY CLERK  
HONOLULU, HAWAII

From: Martin J. Burke (burkem002@hawaii.rr.com)  
Sent: Wednesday, October 18, 2000 2:26 PM  
To:  
Subject: Primary Transportation Corridor

Martin J. Burke  
94-823 Leomana Way  
Waipahu, HI 96797-4015  
October 18th, 2000

Councilmember Duke Bainum  
Chair, Committee on Transportation  
Honolulu Hale  
Honolulu, Hawaii 96813

Reference: Primary Transportation Corridor EIS

Dear Councilmember Bainum:

Waipahu Neighborhood Board No. 22, on which I serve, meets Thursday, October 19th. Therefore I'll be unable to attend your hearings on the EIS scheduled for that evening.

Had I been able to attend, I would have indicated my support for Alternative 3, the Bus Rapid Transit system. I think it offers the best compromise between cost, flexibility and adaptability. It also appears to hold the best promise for evolution, the integration of new technology over time, component by component, without rendering other components obsolete. While it will cost more up front, I think the added investment will pay dividends (road construction and repair, etc.)

I realize that no single alternative will please everyone. Yours is a difficult position, but I'm certain that a thorough review and community input will lead you to the same conclusion. I appreciate the opportunity to participate in the review process. Good luck to you and your Committee.

Warm Regards,

Marty Burke

Mr. Martin J. Burke  
94-823 Leomana Way  
Waipahu, Hawaii 96797-4015

Dear Mr. Burke:

Subject: Primary Corridor Transportation Project

This is in response to your October 18, 2000 letter regarding your comment on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

"Waipahu Neighborhood Board No. 22, on which I serve, meets Thursday, October 19th. Therefore I'll be unable to attend your hearings on the EIS scheduled for that evening. Had I been able to attend, I would have indicated my support for Alternative 3, the Bus Rapid Transit System. I think it offers the best compromise between cost, flexibility and adaptability. It also appears to hold the best promise for evolution, the integration of new technology over time, component by component, without rendering other components obsolete. While it will cost more up front, I think the added investment will pay dividends over time in reduced operating costs in the context of the entire transportation infrastructure (road construction and repair, etc.)"

Response: We appreciate you taking the time to review the DEIS and for supporting the project.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

*Cheryl D. Soon*  
CHERYL D. SOON  
Director



DEPARTMENT OF TRANSPORTATION SERVICES  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE MENDO MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD02-00541

Mr. Sam Caldwell  
98-099 Uao Place  
Aiea, Hawaii 96701

Dear Mr. Caldwell:

Subject: Primary Corridor Transportation Project

This is in response to your testimony at the October 19, 2000 Special Transportation Committee Meeting regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. So, I just want to add my two cents to the fact that I'm against placement of the transit center at that location being the Kam Drive-in Theater location for most of the reasons, all the reasons Mr. Ciesla mentioned.
2. But, also because the newspaper documented. That summary mentioned that this was supposed to be for a location suitable for Pearl City and Aiea. That's very much into the Aiea and pretty far better serve both communities to start with.
3. But the biggest reason I'm against it is because I think it would hurt my property value, increase the noise factor and it's inappropriate use at Kam Center ... it's Kam Drive in it's inappropriate because of the proximity to all the residential properties.
4. My condominium building would be the most impacted. But you have several other condominium buildings right around there from noise, etc. and tremendous congestion and traffic problems would come of this if you have the hump there on Keonohi Street and Moanalua Road which is already... That's probably the most busiest intersection now in the Aiea area. So, cars are backed up in both directions on the rush hours in all directions at that intersection of Keonohi Street and Moanalua Road. And, I think that... I basically like the transit plan, the BRT or the other method but I just don't think that the exact location of having the transit center at the Kam Drive-in is the best place.

Response: We appreciate you taking the time to attend the meeting. Please be advised that the Kamehameha Drive-in is no longer being considered as a transit center site.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

Primary Corridor Transportation Project  
City Council Testimony of Dennis Cuffan  
Further information contact 528-4411

October 5, 2000

## Bus or Rail?

Here we go again debating our transportation future. We still do not have a clear consensus as a community on how to deal with traffic congestion. This is evident from recent community meetings, and the vague language of the city's new proposal, and our past history. The city has developed a proposal, but it is rather inconclusive when it comes to the crucial question of type of vehicle for the main line. They seem to be suggesting an experimental electric bus that is only in trial use one place in the world.

I have a better suggestion, based on my many years of being involved with the issue here, and my extensive travels where I have used rail-transit systems in 27 different cities: San Francisco, San Diego, Montreal, Chicago, New York, Boston, Philadelphia, Washington, London, Amsterdam, Heidelberg, Munich, Berlin, Paris, Rome, Geneva, Bern, Vienna, Prague, Budapest, Istanbul, St. Petersburg, Oslo, Stockholm, Buenos Aires, Tokyo and Singapore. In my job as an international tour organizer I'm responsible for efficiently moving groups of Hawaii people around in these cities. These travels have taught me a lot about the effectiveness of different kinds of transit systems.

After much thought on the ramifications, here is my proposal: We have reached the point where we probably do need a light rail trolley system to help the leeward commuters. Buses do not have the comfort level, carrying capacity or speed that rail can provide, and would thus probably not attract as many riders as a new rail system. Rail would offer a smoother faster ride, and the vehicle would be much larger with many more seats. If we are going to take away two lanes of traffic, we should utilize those lanes with the highest passenger capacity possible. This means light rail. It is a reliable off-the-shelf technology that has been in use for a century, and has been continually updated and improved.

There can be no question that rubber-tire buses would provide a less-comfortable ride than rail. The road surface will never be smooth, and the soft suspension therefore required of buses guarantees a bouncy ride that swings back and forth. Rail on the other hand will be perfectly flat and smooth, and the vehicle will not bounce at all. This is no trivial matter for the greater comfort level will attract many marginal potential riders. For all these reasons we can expect that rail ridership will turn out to be higher than bus.

In 1978 I was strongly against the proposed HART elevated "fixed-guideway" heavy rail system. I even produced a television documentary that attacked it from many angles, and was a leading spokesman for the opposition to rail. During these last twenty years that we have seen traffic grow, many things have changed. Congestion gets more intense as the island gets more developed, while very little has been done to improve public transit. I am still against the idea of an elevated heavy rail system, but the compromise of street-level light rail, which was never really considered previously, is very appealing now.

With a careful analysis we can explore the big issues, such as: Should there be a dedicated right of way in which the trolley is completely separated from automobiles, or a shared right of way, or some kind of combination? The best result for transit would be an exclusive lane

## Bus or Rail?

I would like to begin by complementing the City Department of Transportation Services for their hard work, along with their consultants, in putting together this comprehensive traffic proposal for our future. I do agree with the general concepts that are being suggested for us as the best solution, including exclusive use of selected lanes in town for rapid transit.

However I do have one major disagreement with their proposal, and that concerns the type of vehicle for the high capacity in-town line between Middle Street and the University. The city is suggesting an experimental electric bus that is only in trial use one place in the world.

I feel this would be a big mistake. We should instead have a light rail system, similar to that found now in hundreds of cities around the world. Light rail should be put back into the analysis as a viable alternative to be considered, and adopted.

My feeling about this is based on my many years of being involved with the issue here, which began 24 years ago, and my extensive travels where I have used rail rapid-transit systems in 29 different cities: San Francisco, San Diego, Montreal, Vancouver, Toronto, Chicago, New York, Boston, Philadelphia, Washington, London, Amsterdam, Heidelberg, Munich, Berlin, Paris, Rome, Geneva, Bern, Vienna, Prague, Budapest, Istanbul, St. Petersburg, Oslo, Stockholm, Buenos Aires, Tokyo and Singapore. In my job as an international tour organizer I'm responsible for efficiently moving groups of Hawaii people around in these cities. These travels have taught me a lot about the effectiveness of different kinds of rail transit systems.

The city's own Draft EIS admits that light rail would carry more passengers than the BRT. The only significant reason the city raises in the EIS for rejecting light rail is that it would carry too many passengers! This backwards logic is right out of Alice in Wonderland. This shows the city is not looking to create a system of maximum efficiency, and I feel this is a big mistake.

If we are going to take away two lanes of traffic from existing roads in town for transit, we have a social obligation to make sure that we get the highest possible use of those lanes for moving people. That solution is light rail. If we are going to take away two lanes of traffic, we should utilize those lanes with the highest passenger capacity possible.

Along with higher carrying capacity, there is another major factor why I support rail, and that is comfort for the passenger. This is not addressed at all in the EIS.

Buses do not have the comfort level that rail can provide, and would thus probably not attract as many riders as a new rail system. Rail would offer a smoother faster ride, and the vehicle would be much larger with many more seats. There can be no question that rubber-tire buses would provide a less comfortable ride than rail. The road surface will never be smooth, and the soft suspension therefore required of buses guarantees a bouncy ride that sways back and forth. Rail on the other hand will be perfectly flat and smooth, and the vehicle will not bounce at all. This is no trivial matter, for the greater comfort level will attract many marginal potential riders. And with the greater passenger capacity there is a good chance everyone can find a seat. For all these reasons we can expect that rail ridership will turn out to be higher than bus.

that cars cannot enter, with some exceptions at selected intersections for turning. Probably the only affordable way to build this system is to have most of the transitway at street level, which means the transit vehicles will stop for traffic signals. During rush hour the traffic lights can be synchronized, and can be triggered to turn green by the approaching transit vehicle and automobiles turning into the path of the transit vehicles can be similarly controlled. It also means there would probably be overhead electric wires, but the visual impact can be minimized, and this is one trade-off we might have to make.

Building a completely elevated or underground rapid transit system would be extremely expensive and the public arguments about costs and visual blight would lead right back into the same stalemate we have witnessed for the past two decades. However, it may well be that certain segments of the light rail trolley should be grade-separated at some key intersections, like right here, under Kapiolani at Kalanianaʻola, which is a very busy intersection now and could serve as a transfer hub into Waikiki. In the downtown core, the system could be grade-separated, with the trolley running under Hotel Street and interfacing with street-level buses that would be circulators to disperse commuters to their workplaces. This would create a dynamic transit hub that would stimulate our central business district.

What streets should the transit system run along? An express bus demonstration project could try a variety of routes over a twelve-month period and then analyze the results, before making an irreversible commitment to sink rails into the roadbed. The unfortunate paradox is that the best locations for a trolley are the city streets that are currently the busiest with automobiles, for this is where people want to go. Removing the automobile from selected lanes would not be as traumatic as it might seem, for our busiest streets already have local bus service that is claiming much of the capacity of the curb lane. The pay-off would be much higher capacity for mass transit that will move more riders along much faster, for one lane of rapid transit can carry many more people than several lanes devoted to automobiles.

In the urban center we have three main streets between downtown and the University - Kapiolani, King and Beretania. We could test Kapiolani with "rapid transit" buses in a two-lane system for six months, perhaps with help from parallel streets like Kona and Waimanu. Then try King or Beretania, either with a two-way system on one of them, or separate one-way lines on each. West of downtown we have major opportunities along Dillingham, North King, and Nimitz that can be tried. Preliminary discussion of street selection could be included in future neighborhood meetings that should be held on this issue.

Modifications would have to be made to prepare the streets, including barricading the transit lanes to keep the cars out. Selective street widening at certain transit stops would help enhance traffic flow. For the program to succeed it would need adequate parking lots in the outskirts, such as at Waikale and Aloha Stadium, and there should be efficient feeder and circulator buses available to bring passengers to and from the main line.

Now is a good time to consider rail, for we are not yet firmly committed to a particular plan. We have an activist mayor and the transportation departments of both city and state who are all eager to work together on implementing some solutions. The large numbers of skilled traffic planners and highway workers we already have on the government payroll can tackle the myriad technical details involved in creating this system.

Dennis Callan is president of the Hawaii Geographic Society, and among many past community involvements, was the chairman of the Oahu Metropolitan Planning Organization Citizen Advisory Committee on transportation.

Another factor not considered in the EIS is reliability. Light rail is a proven off-the-shelf technology that has been in use for a century all around the world, and has been continually updated and improved. On the other hand the proposed BRT is "vaporware" that does not even exist in standard commercial operation yet.

As far as cost, the city's own study shows that rail is not more expensive than BRT, and if you can get higher ridership with rail, it should actually be less expensive than BRT.

In 1978 I was strongly against the proposed HART elevated "fixed-guideway" heavy rail system. I even produced a television documentary that attacked it from many angles, and was a leading spokesman for the opposition to rail. During these last twenty years that we have seen traffic grow, many things have changed. Congestion gets more intense as the island gets more developed, while very little has been done to improve public transit. I am still against the idea of an elevated heavy rail system, but the compromise of street-level light rail, which was never really considered previously, is very appealing now.

With a careful analysis we can explore the big issues, such as: Should there be a dedicated right of way in which the trolley is completely separated from automobiles, or a shared right of way, or some kind of combination? The best result for transit would be an exclusive lane that cars cannot enter, with some exceptions at selected intersections for turning. Probably the only affordable way to build this system is to have most of the transitway at street level, which means the transit vehicles will stop for traffic signals. During rush hour the traffic lights can be synchronized, and can be triggered to turn green by the approaching transit vehicle and automobiles turning into the path of the transit vehicles can be similarly controlled. It also means there would probably be overhead electric wires, but the visual impact can be minimized, and this is one trade-off we might have to make.

Building a completely elevated or underground rapid transit system would be extremely expensive and the public arguments about costs and visual blight would lead right back into the same stalemate we have witnessed for the past two decades. However, it may well be that certain segments of the light rail trolley should be grade-separated at some key intersections, like right here, under Kapiolani at Kalakaua, which is a very busy intersection now and could serve as a transfer hub into Waikiki.

What streets should the transit system run along? An express bus demonstration project could try a variety of routes over a twelve-month period and then analyze the results, before making an irreversible commitment to sink rails into the roadbed. The unfortunate paradox is that the best locations for a trolley are the city streets that are currently the busiest with automobiles, for this is where people want to go. Removing the automobile from selected lanes would not be as traumatic as it might seem, for our busiest streets already have local bus service that is claiming much of the capacity of the curb lane. The pay-off would be much higher capacity for mass transit that will move more riders along much faster, for one lane of rapid transit can carry many more people than several lanes devoted to automobiles.

In the urban center we have three main streets between downtown and the University - Kapiolani, King and Beretania. We could test Kapiolani with "rapid transit" buses in a two-lane system for six months, perhaps with help from parallel streets like Kona and Waimanu. Then try King or Beretania, either with a two-way system on one of them, or separate one-way lines on each. West of downtown we have major opportunities along Dillingham, North King, and Nimitz that can be tried. Preliminary discussion of street selection could be included in future neighborhood meetings that should be held on this issue.

Modifications would have to be made to prepare the streets, including barricading the transit lanes to keep the cars out. Selective street widening at certain transit stops would help enhance traffic flow. For the program to succeed it would need adequate parking lots in the outskirts, such as at Waialeale and Aloha Stadium, and there should be efficient feeder and circulator buses available to bring passengers to and from the main line.

Now is a good time to consider rail, for we are not yet firmly committed to a particular plan. We have an activist mayor and the transportation departments of both city and state who are all eager to work together on implementing some solutions. The large numbers of skilled traffic planners and highway workers we already have on the government payroll can tackle the myriad technical details involved in creating this system.

Questions for the EIS to answer, and statements to respond to:

Where is the BRT being used elsewhere?  
What problems does the system in Trieste have? What is the population of Trieste? How does this being a European system make the results less applicable here?

Can you put light rail back into the analysis as a viable alternative to be considered, and adopted?

If we are going to take away two lanes of traffic from existing roads in town for transit, don't we have a social obligation to make sure that we get the highest possible use of those lanes for moving people? Is it not possible that LRT ridership would grow after 2025? Why is your time frame only 2025? How long would the system last?

Comfort of ride is not addressed at all in the EIS. Please respond to the following statements:

Buses do not have the comfort level that rail can provide, and would thus probably not attract as many riders as a new rail system. Rail would offer a smoother faster ride, and the vehicle would be much larger with many more seats. There can be no question that rubber-tire buses would provide a less-comfortable ride than rail. The road surface will never be smooth, and the soft suspension therefore required of buses guarantees a bouncy ride that sways back and forth. Rail on the other hand will be perfectly flat and smooth, and the vehicle will not bounce at all. This is no trivial matter, for the greater comfort level will attract many marginal potential riders. And with the greater passenger capacity there is a good chance everyone can find a seat. For all these reasons we can expect that rail ridership will turn out to be higher than bus.

Another factor not considered in the EIS is reliability. Please respond to the following statements: Light rail is a proven off-the-shelf technology that has been in use for a century all around the world, and has been continually updated and improved. On the other hand the proposed BRT is "vaporware" that does not even exist in standard commercial operation yet.

As far as cost, the city's own study shows that rail is not more expensive than BRT, and if you can get higher ridership with rail, would it actually be less expensive than BRT? At what point would this happen?

Please respond to the following statements: It may well be that certain segments of the light rail trolley should be grade-separated at some key intersections, like under Kapiolani at Kalakaua, which is a very busy intersection now and could serve as a transfer hub into Waikiki.

Indeed the superiority of rail can be demonstrated by the city's own study, as shown in these excerpts from the draft EIS:

"LRT technology could be configured to provide far greater peak line capacity through the use of multi-vehicle trains...Higher-capacity vehicles and the ability to form trains would give LRT systems a potential operating labor advantage over BRT systems because one vehicle operator could be

responsible for far more passengers. If in the future (beyond 2025) the additional capacity needed is so large as to require multiple units, this capability can be achieved by entraining LRT vehicles, whereas BRT vehicles cannot be entrained.

**Ridership Difference** Because the standard LRT vehicles can carry 30 to 40 percent more passengers per vehicle than articulated electric buses, and can be entrained, fewer vehicles are needed to serve the same level of ridership. While positive from an operating cost standpoint, it results in less frequent service being needed with LRT vs. BRT systems. The service frequency difference resulted in approximately 20 percent fewer riders projected to use the LRT vs. BRT system. Ridership would be different on an LRT vs. BRT system because of the difference in the frequency of service. Because of larger size of standard LRT vehicles, the headways on an LRT system would be longer to serve the same number of passengers. Because of the less frequent service on an LRT system, some passengers would find an LRT system less attractive than a BRT system with shorter headways. Therefore, ridership projections for the BRT option were forecast to be almost 20 percent greater than on the LRT alternative because of the more frequent service.

**COSTS:** [approx \$100 million more for tracks, but local share of that is just \$30 million] Mitigating this cost differential, however, is the useful life of the transit vehicles. Potential BRT vehicles span a range, but generally require replacement at the standard replacement interval for buses of 12 to 15 years. In contrast, LRT vehicles would require replacement at the standard LRT interval of 25 to 30 years. The longer useful life of the LRT vehicles would over time offset the greater initial cost for LRT vehicles. Capital costs for the In-Town BRT system would be 35 percent less than with an LRT system on the same alignment. This cost difference even reflects the need to replace buses on a 12 year replacement cycle while LRT vehicles have a 30 year useful life. The added cost for the LRT option reflects the high costs of trackwork, yards and shops. Vehicle cassis would actually be somewhat less for the LRT option when the less frequent replacement cycle and smaller fleet requirements are taken into account. Annual systemwide transit operating and maintenance costs were also estimated for each alternative for the forecast year 2025. Operating and maintenance costs would be essentially the same for the LRT and BRT options. The cost per new rider gained with the LRT would be 2.8 times as costly as with the BRT.

[regarding noise] No significant differences would exist between the two technologies. An advantage at stations would exist if vehicles operating in the exclusive section of the system were guided. [LRT is guided, BRT is not]

*Dennis Callan is president of the Hawaii Geographic Society, and among many past community involvements, was the chairman of the Oahu Metropolitan Planning Organization Citizen Advisory Committee on transportation.*

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TPD02-00541

November 13, 2002

Mr. Dennis Callan  
1011 Prospect Street, Apt. 702  
Honolulu, Hawaii 96822

Dear Mr. Callan:

Subject: Primary Corridor Transportation Project

This is in response to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS). We are responding to your October 5, 2000 letter, your October 5 and 12, 2000 oral testimonies at the Special Transportation Committee Meetings, and your oral testimony at the October 12, 2000 formal public hearing regarding the MIS/DEIS.

1. *The City has developed a proposal, but it is rather inconclusive when it comes to the crucial question of type of vehicle for the main line. They seem to be suggesting an experimental electric bus that is only in trial use one place in the world.*

**Response:** Technologies proposed for the BRT Alternative include embedded plate technology (EPT), consisting of electric vehicles powered by a wayside traction power delivery system, or hybrid-electric propulsion system where energy for traction power is carried on-board the vehicle. EPT vehicles would emit zero emissions. Hybrid-electric vehicles would be low-emission vehicles because their diesel engines would always be operating at efficient levels.

The implementation plan outlined in the FEIS calls for an initial installation of hybrid-electric buses on the In-Town BRT. In 2008 a decision will be made on the long-term technology for the In-Town BRT. If service proven by then, the plan calls for selection of EPT.

2. *We have reached the point where we probably do need a light rail trolley system to help the leeward commuters.*

**Response:** A Light Rail Transit (LRT) technology was considered but was dropped because of the relatively high costs associated with trackwork and utility relocation. It was determined that LRT performance could be achieved with electric bus technology at a substantially reduced cost.

The two candidate technologies being considered for the BRT Alternative are an embedded plate system and a hybrid propulsion system.

The BRT Alternative includes a regional BRT System that includes an H-1 BRT Corridor consisting of new express and zipper lanes, allowing express buses from Ewa and Central Oahu to bypass peak period traffic congestion on their way to downtown.

3. Buses do not have the comfort level, carrying capacity or speed that rail can provide, and would thus probably not attract as many riders as a new rail system. Rail would offer a smoother faster ride, and the vehicle would be much larger with many more seats.

Response: Newer low-floor articulated buses do provide appropriate comfort levels and convenient egress similar to rail transit. The BRT can be designed to increase potential capacity by implementing well-planned stops, efficient dwell times, restricted right-of-ways, and streamlined fare collection. Traffic signal pre-emption can further alleviate congestion.

While comfort of ride is a factor in considering which mode to use, experience has shown that other factors such as convenience (proximity to origin and destination of the trip), overall travel time, reliability, and cost are more important. The BRT can be competitive with rail on each of these factors at a lower cost to construct.

4. If we are going to take away two lanes of traffic, we should utilize those lanes with the highest passenger capacity possible. This means light rail. It is a reliable off-the-shelf technology that has been in use for a century, and has been continually updated and improved.

Response: The two candidate technologies, the Embedded Plate System and the Hybrid Propulsion System are still in the process of being fully developed. However, as indicated in Chapter 2 of the MISDEIS selected technologies must have the capacity to move more than 3,000 passengers per hour per direction because travel demand forecasting indicates that this is the approximate line haul requirement in 2025. It is assumed that the Embedded Plate System and the Hybrid Propulsion System will have transit vehicles that can accommodate 100 persons per vehicles. This is the same capacity as a 60-foot articulated bus.

A fully grade-separated transit system was considered and rejected since it was determined at the outset that the public was not in favor of an elevated transit system because of its high cost and its physical and visual impacts as discussed in Chapter 2.6.1 of the MISDEIS.

5. There can be no question that rubber-tire buses would provide a less-comfortable ride than rail. The road surface will never be smooth, and the soft suspension therefore required of buses guarantees a bouncy ride that always sways back and forth.

Response: Newer low-floor buses with newer suspension systems are more comfortable than older traditional buses. The In-Town BRT will include newly designed roadbeds. In addition, interiors of newly designed buses are quieter and the temperature is better controlled than in older buses. Buses are typically designed to last only twelve years, and can be replaced with better technology sooner. Rail vehicles are typically designed to last 30 years and reflect wear (noise and worn suspension) in their mid-life. It is usually less costly to replace buses than it is to rehabilitate rail cars. Hence, comfort aspects of the ride are primarily dependent on the condition of equipment, rather than type of equipment. Rails also require frequent maintenance to maintain a smooth ride, similar to roads.

6. Rail on the other hand will be perfectly flat and smooth, and the vehicle will not bounce at all. This is no trivial matter, for the greater comfort level will attract many marginal potential riders. For all these reasons we can expect that rail ridership will turn out to be higher than bus.

Response: New equipment with a new suspension system will provide a smooth ride regardless of the mode. Certainly, a new rail system will provide a smoother ride than an old road. However, the rails must be rigorously maintained to retain the smooth ride. While comfort of ride is a factor

in considering which mode to use, experience has shown that other factors such as convenience (proximity to origin and destination of the trip), overall travel time, reliability, and cost are more important. The BRT can be competitive with rail on each of these factors at a lower cost to construct.

7. I am still against the idea of an elevated heavy rail system, but the compromise of street-level light rail, which was never really considered previously, is very appealing now.

Response: Light rail transit was evaluated during the early stages of the MISDEIS process and was dropped as an alternative when it was concluded that the BRT Alternative offered almost all of the benefits of light rail at a much lower cost. Additionally, the BRT offers the flexibility to let other buses share the BRT lanes to maximize the investment in fixed facilities. Also, since BRT vehicles would not be wedded to tracks, they could alter their routing during parades, utility repair work, or other blockages that light rail vehicles cannot.

8. Should there be a dedicated right-of-way in which the trolley is completely separated from automobiles, or a shared right-of-way, or some kind of combination? The best result for transit would be an exclusive lane that cars cannot enter, with some exceptions at selected intersections for turning.

Response: Along its length the proposed BRT employs a combination of lane configurations tailored to the specific conditions in each area traversed. Along some sections, lanes will be for the exclusive use of BRT vehicles (e.g. Dillingham Boulevard, Hotel Street and sections of King Street, Pensacola, Kapiohali Boulevard, and University Avenue. In other sections lanes will be shared with only right-turning vehicles (e.g. sections of King, Pohukaina, South, and Auahi Streets), elsewhere lanes will be shared with private buses (e.g. Ala Moana Boulevard, Kalia Road, Saratoga Road, and Kalakaua and Kuhio Avenues), and places where the BRT will operate in mixed traffic (e.g. sections of Bishop, Alakea, Aloha Tower Drive, Ala Moana Boulevard, Forrest Avenue, Ilioa Street, and Keppiohali Boulevard).

9. Probably the only affordable way to build this system is to have most of the transitway at street level, which means the transit vehicles will stop for traffic signals. During rush hour the traffic lights can be synchronized, and can be triggered to turn green by the approaching transit vehicle and automobiles turning into the path of the transit vehicles can be similarly controlled.

Response: The BRT Alternative consists of transit vehicles operating at street level. Traffic signals will be synchronized and programmed to provide priority to the transit lanes.

10. It also means there would probably be overhead electric wires, but the visual impact can be minimized, and this is one trade-off we might have to make.

Response: Overhead wires were strongly opposed by attendees of early round public meetings. Accordingly, technologies dependent on overhead traction power wires were eliminated.

11. Building a completely elevated or underground rapid transit system would be extremely expensive and the public arguments about costs and visual blight would lead right back into the same stalemate we have witnessed for the past two decades. However, it may well be that certain segments of the light rail trolley should be grade-separated at some key intersections, like the right here, under Keppiohali at Kalakaua, which is a very busy intersection now and could serve as a transfer hub into Waikiki. In the downtown core, the system could be grade-separated, with the

*trolley running under Hotel Street and interfacing with street-level buses that would be circulators to disperse commuters to their workplaces. This would create a dynamic transit hub that would stimulate our central business district.*

*Response:* For cost and aesthetic reasons the In-Town BRT is proposed to be entirely at-grade. Bottleneck locations such as the Kapolei/Kalaheua intersection may require grade-separation in the future with or without the BRT to reduce general traffic delays. If grade-separation occurs, BRT riders would benefit along with other users of the intersection.

*12. What streets should the transit system run along? An express bus demonstration project could try a variety of routes over a twelve-month period and then analyze the results, before making an irreversible commitment to sink rails into the roadbed.*

*Response:* The proposed BRT system is based on ridership experience of the City's existing bus services, including the recently implemented express bus services that use much of the proposed BRT alignment, forecasts of BRT and local bus ridership using regional travel forecasting models, and input received at hundreds of public outreach meetings. A test without all features of the BRT system in place (i.e., limited stop operations in exclusive and semi-exclusive lanes using low-floor vehicles with level boarding through multiple doors) would be misleading and not a true test of the system. For example, the project proposes to completely reconstruct Dillingham Boulevard through the Kaimali area to provide significant pedestrian amenities to facilitate access to BRT stations, as well as building new BRT stations and exclusive lanes in the center of the roadway. Without such major reconstruction, it would not be possible to provide the substantial time savings for transit riders through this corridor that would be offered by the BRT. Most importantly, potential new riders would not likely perceive the demonstration service as permanent and would not be induced to change their travel mode.

*13. The unfortunate paradox is that the best locations for a trolley are the city streets that are currently the busiest with automobiles; for this is where people want to go. Removing the automobile from selected lanes would not be as traumatic as it might seem, for our busiest streets already have local bus service that is claiming much of the capacity of the curb lane. The payoff would be much higher capacity for mass transit that will move more riders along much faster, for one lane of rapid transit can carry many more people than several lanes devoted to automobiles.*

*Response:* Comment noted. The DTS agrees with this statement.

*14. In the urban center we have three main streets between downtown and the University -- Kapolei, King and Beretania. We could test Kapolei with "rapid transit" buses in a two-lane system for six months, perhaps with help from parallel streets like Kona and Waimanui. Then try King or Beretania, either with a two-way system on one of them, or separate one-way lanes on each. West of downtown we have major opportunities along Dillingham, North King, and Nimitz that can be tried. Preliminary discussion of street selection could be included in future neighborhood meetings that should be held on this issue.*

*Response:* The proposed BRT system is based on ridership experience of the City's existing bus services, including the recently implemented express bus services that use much of the proposed BRT alignment, forecasts of BRT and local bus ridership using regional travel forecasting models, and input received at hundreds of public outreach meetings. A test without all features of the BRT system in place (i.e., limited stop operations in exclusive and semi-exclusive lanes using low-floor vehicles with level boarding through multiple doors) would be misleading and not a true test of the system. For example, the project proposes to completely reconstruct Dillingham Boulevard

*through the Kaimali area to provide significant pedestrian amenities to facilitate access to BRT stations, as well as building new BRT stations and exclusive lanes in the center of the roadway. Without such major reconstruction, it would not be possible to provide the substantial time savings for transit riders through this corridor that would be offered by the BRT. Most importantly, potential new riders would not likely perceive the demonstration service as permanent and would not be induced to change their travel mode.*

*15. Modifications would have to be made to prepare the streets, including barricading the transit lanes to keep the cars out. Selective street widening at certain transit stops would help enhance traffic flow.*

*Response:* There are no plans to provide a physical barrier to separate the BRT lanes from adjacent lanes. The BRT lanes will be clearly delineated and signed. Since large, specially marked BRT vehicles will be utilizing these lanes it will be obvious which vehicles are violators and therefore it will not take much law enforcement manpower to monitor and enforce the lane designation. There will be an enforcement mechanism developed to discourage private vehicles from entering BRT-exclusive lanes. These enforcement mechanisms may be in the form of a fine for entering a BRT-exclusive lane, similar to the fines imposed on the existing HOV lanes.

*16. For the program to succeed it would need adequate parking lots in the outskirts, such as at Waikale and Aloha Stadium, and there should be efficient feeder and circulator buses available to bring passengers to and from the main line.*

*Response:* There is a transit center/park-and-ride facility proposed for Aloha Stadium that will provide a transfer point for circulator buses from the neighborhoods to the transit center.

*17. Now is a good time to consider rail, for we are not yet firmly committed to a particular plan.*

*Response:* The proposed BRT will be able to provide most of the benefits of light rail transit at a much lower cost and with greater operating flexibility.

*18. But, I agree with the general concepts of the plan and yet I have one very large disagreement and that regards the type of vehicle in the primary urban core. I really think it should be light rail.*

*Response:* See response to comment #17.

*19. I've ridden rail systems in 30 cities around the country and around the world and I've seen them work. And I've seen what kinds of hardware are available now. What kinds of hardware have been in existence for a century-- light rail, trolleys -- and have been continually improved and updated.*

*Response:* The BRT is based on the most ubiquitous technology around the world -- the bus. It has been continually improved and updated with BRT being the most recent application of this proven technology. The key BRT features being proposed in Honolulu have been tested and proven in cities throughout the world including Curitiba and Sao Paulo, Brazil; Brisbane and Adelaide, Australia; Auckland, New Zealand; Vancouver and Orlawa, Canada; Dublin, Ireland; Nagoya, Japan; and New York City, Los Angeles, Pittsburgh, and Orlando in the U.S.

*20. This is off-the-shelf technology that's getting better with time and is enjoying, in fact, a renaissance around the world. Rather than an untested Trieste electric bus that may or may not work, the light rail has many advantages. It has much greater capacity, and in particular, it*

provides a more comfortable ride. There's no comparison between riding on rail or riding on asphalt road. The road is going to be bumpy. The vehicles are going to have to have a suspension to deal with the bumps and they're not going to be as comfortable as rail.

**Response:** Conventional light rail requires overhead traction power wires that were ruled out as unacceptable by the public at the early stages of the Primary Corridor Transportation Project. Light rail using embedded plate traction power was considered an option, but it as with buses using this new technology has not yet been service proven. The asserted advantages of light rail even if they existed, namely greater passenger capacity per vehicle and comfort of ride would not be sufficient to offset light rail's much higher cost and reduced operating flexibility. See responses to comments #28 and #30 with regard to differences in capacity and comfort of ride.

21. Twenty-four years ago I got very much involved in fighting against the grade-separated HART proposal and I'm still against grade-separated system.

**Response:** The proposed system is not grade-separated.

22. However, there may be a few opportunities at intersections for grade separation. This happens in many, many systems. Going under. Ducting under. Right here, at Kepioleni and Kalaiaua, for example. An underground transfer station to connect to a shuttle into Waikiki. We don't need rail in Waikiki. We need rail on the main route to bring the commuters to work.

**Response:** Grade-separation at various intersections was considered and rejected since it was determined at the outset that the public was not in favor of an elevated transit system because of its physical and visual impacts.

23. As long as we're going to take lanes away at surface, we have to make the most use of those lanes in terms of capacity. And light rail has much greater capacity than \_\_\_\_\_ electric bus. There's no question about that.

**Response:** See response to comment #20.

24. In fact, I advocated that in public testimony and essays that a test period with express buses, existing buses on the routing would be excellent.

**Response:** The proposed BRT system is based on ridership experience of the City's existing bus services, including the recently implemented express bus services that use much of the proposed BRT alignment, forecasts of BRT and local bus ridership using regional travel forecasting models, and input received at hundreds of public outreach meetings. A test without all features of the BRT system in place (i.e., limited stop operations in exclusive and semi-exclusive lanes using low-floor vehicles with level boarding through multiple doors) would be misleading and not a true test of the system. For example, the project proposes to completely reconstruct Dillingham Boulevard through the Kaimali area to provide significant pedestrian amenities to facilitate access to BRT stations, as well as building new BRT stations and exclusive lanes in the center of the roadway. Without such major reconstruction, it would not be possible to provide the substantial time savings for transit riders through this corridor that would be offered by the BRT. Most importantly, potential new riders would not likely perceive the demonstration service as permanent and would not be induced to change their travel mode.

25. But, it seems to me from the proposals here there's no light rail mentioned as one of the proposals being considered. And I think that it should be put back into the list for active consideration.

**Response:** See response to comment #20.

26. I do agree with the general concepts that are being suggested for us as the best solution, including exclusive use of selected lanes in town for rapid transit. However I do have one major disagreement with their proposal, and that concerns the type of vehicle for the high capacity in-town line between Middle Street and the University. The city is suggesting an experimental electric bus that is only in trial use one place in the world.

**Response:** See responses to comments #7 and #20.

27. We should instead have a light rail system, similar to that found now in hundreds of cities around the world. Light rail should be put back into the analysis as a viable alternative to be considered, and adopted.

**Response:** See response to comment #7.

28. The City's own Draft EIS admits that light rail would carry more passengers than the BRT. The only significant reason the city raises in the EIS for rejected light rail is that it would carry too many passengers! This backwards logic is right out of Alice in Wonderland. This shows the City is not looking to create a system of maximum efficiency, and I feel this is a big mistake.

**Response:** The reasons for rejecting the LRT were its high cost and lack of operating flexibility compared to the BRT. The MISDEIS indicated that light rail vehicles would provide excess capacity during much of the day, and even during peak periods could not take advantage of one of the strengths of light rail which is the ability to couple cars to form trains since this would lead to headways (interval between vehicles) being much greater than with BRT. This would mean a longer wait time for riders.

29. If we are going to take away two lanes of traffic from existing roads in town for transit, we have a social obligation to make sure that we get the highest possible use of those lanes for moving people. That solution is light rail. If we are going to take away two lanes of traffic, we should utilize those lanes with the highest passenger capacity possible.

**Response:** With BRT buses there is the flexibility to operate in some segments in exclusive lanes; in other sections these lanes could be shared with private buses. In some cases the BRT will operate in mixed traffic in general purpose lanes. This flexibility to operate effectively in different conditions to be responsive to real world constraints has been crucial in achieving public acceptance for the project. Light rail lacks the flexibility to adapt to the nuances encountered along the alignment.

30. Along with higher carrying capacity, there is another major factor why I support rail, and that is comfort for the passenger. This is not addressed at all in the EIS.

**Response:** There would be no significant level of comfort difference between a well-designed BRT vehicle operating along a concrete roadway at the speeds proposed for the In-Town system when compared with a light rail vehicle.

31. Buses do not have the comfort level that rail can provide, and would thus probably not attract as many riders as a new rail system. Rail would offer a smoother faster ride, and the vehicle would be much larger with many more seats. There can be no question that rubber-tire buses would provide a less-comfortable ride than rail. The road surface will never be smooth, and the soft suspension therefore required of buses guarantees a bouncy ride that sways back and forth.

**Response:** The comfort of the ride is dependent upon frequent maintenance of the roads or rails and replacement of suspension systems at appropriate intervals recommended by the vehicle manufacturer.

Newer low floor articulated buses do provide appropriate comfort levels and convenient egress similar to rail transit. The BRT can be designed to increase potential capacity by implementing well-planned stops, efficient dwell times, restricted right-of-ways, and stream-lined fare collection. Traffic signal pre-emption can further alleviate congestion.

While comfort of ride is a factor in considering which mode to use, experience has shown that other factors such as convenience (proximity to origin and destination of the trip), overall travel time, reliability, and cost are more important. The BRT can be competitive with rail on each of these factors at a lower cost to construct.

32. Rail on the other hand will be perfectly flat and smooth, and the vehicle will not bounce at all. This is no trivial matter, for the greater comfort level will attract many marginal potential riders. And with the greater passenger capacity there is a good chance everyone can find a seat. For all these reasons we can expect that rail ridership will turn out to be higher than bus.

**Response:** Newer low-floor buses with newer suspension systems are more comfortable than the older traditional buses. In addition, the interior of newly designed buses is quieter and the temperature is better controlled than older buses. Buses are typically designed to last only twelve years, and can be replaced with better technology sooner. Rail vehicles are typically designed to last 30 years and reflect wear (noise and worn suspension) in their mid-life. It is usually less costly to replace buses that it is to rehab rail cars. Hence, the comfort aspects of the ride are primarily dependent on the condition of the equipment, rather than the type of equipment. Rails also require frequent maintenance to maintain a smooth ride, similar to roads.

33. Another factor not considered in the EIS is reliability. Light rail is a proven off-the-shelf technology that has been in use for a century all around the world, and has been continually updated and improved. On the other hand the proposed BRT is "vaporware" that does not even exist in standard commercial operation yet.

**Response:** See response to comment #20.

34. As far as cost, the city's own study shows that rail is not more expensive than BRT, and if you can get higher ridership with rail, it should actually be less expensive than BRT.

**Response:** It is unclear what City study is being referred to in this comment. As stated in the MISDEIS Chapter 2, the trackwork for the LRT system is estimated to cost substantially more than the BRT transitway. The cost differential would be \$94-\$142 million more for a 11.6 mile distance. In general, the LRT vehicle could be as much as \$2 million per vehicle and the estimated vehicle life is approximately twice that of an electric BRT vehicle. The estimated cost of an electric BRT vehicle is approximately \$1.4 million with a vehicle life of 12-15 years. When combining the BRT transitway cost and BRT vehicle cost including replacement vehicles, the BRT

annualized capital cost would be less than the annualized cost of an LRT system. Additionally the LRT O&M cost would be slightly higher than the BRT. Also, the LRT was not forecast to attract any more riders than the BRT.

35. I am still against the idea of an elevated heavy rail system, but the compromise of street-level light rail, which was never really considered previously, is very appealing now.

**Response:** A Light Rail Transit (LRT) technology was considered but was dropped because of the relatively high costs associated with trackwork and utility relocation. It was determined that LRT performance could be achieved with electric bus technology at a substantially reduced cost.

36. Should there be a dedicated right-of-way in which the trolley is completely separated from automobiles, or a shared right-of-way, or some kind of combination? The best result for transit would be an exclusive lane that cars cannot enter, with some exceptions at selected intersections for turning.

**Response:** The In-Town BRT component is comprised of a mix of exclusive BRT, semi-exclusive BRT and mixed-use lanes. The BRT system strives to strike a balance between transit speed and impacts to general traffic. In segments where it was judged that roadway capacity was needed for general traffic and the BRT operation would not be significantly affected, exclusive lanes were replaced by either semi-exclusive or mixed-flow operation. In areas of high BRT ridership volumes, exclusive transit lanes were retained such as on Dillingham and through Downtown.

37. Probably the only affordable way to build this system is to have most of the transitway at street level, which means the transit vehicles will stop for traffic signals. During rush hour the traffic lights can be synchronized, and can be triggered to turn green by the approaching transit vehicle and automobiles turning into the path of the transit vehicles can be similarly controlled.

**Response:** The BRT Alternative consists of transit vehicles operating at street level. At certain intersections, BRT vehicles approaching a green signal will activate a ten second extension of the green indication for that cycle only. BRT vehicles stopped at a red signal will move concurrently with the through traffic in the same direction, unless the BRT vehicle must turn or change lanes, in which case it will be given a five second green signal in advance of the general purpose traffic lanes. All traffic signal extensions and advance indications will be timed in the field during actual operation to minimize adverse effects on general traffic flow.

38. It also means there would probably be overhead electric wires, but the visual impact can be minimized, and this is one trade-off we might have to make.

**Response:** See response to comment #20, first paragraph.

39. Building a completely elevated or underground rapid transit system would be extremely expensive and the public arguments about costs and visual blight would lead right back into the same stalemate we have witnessed for the past two decades. However, if may well be that certain segments of the light rail trolley should be grade-separated at some key intersections, like right here, under Kopikani at Kalakaua, which is a very busy intersection now and could serve as a transfer hub into Waikiki.

**Response:** See response to comment #11.



40. *What streets should the transit system run along? An express bus demonstration project could try a variety of routes over a twelve-month period and then analyze the results, before making an irreversible commitment to sink rails into the roadbed.*

**Response:** The proposed BRT alignment is based on ridership experience of the existing city bus system including recently implemented express bus services that traverse much of the proposed BRT alignment, forecasts of usage using regional travel forecasting models, and input received at hundreds of public outreach meetings and meetings with other public agencies. A demonstration project without all of the features of the BRT system (i.e., limited stop operations in exclusive and semi-exclusive lanes using low-flow buses with level boarding through multiple doors) would not be a true test of what is being proposed.

41. *The unfortunate paradox is that the best locations for a trolley are the city streets that are currently the busiest with automobiles, for this is where people want to go. Removing the automobile from selected lanes would not be as traumatic as it might seem, for our busiest streets already have local bus service that is claiming much of the capacity of the curb lane. The pay-off would be much higher capacity for mass transit that will move more riders along much faster, for one lane of rapid transit can carry many more people than several lanes devoted to automobiles.*

**Response:** Increasing the people-carrying capacity of the existing roadway system is one of the primary objectives of this project.

42. *In the urban center we have three main streets between downtown and the University -- Kapiolani, King and Bereiania. We could test Kapiolani with "rapid transit" buses in a two-lane system for six months, perhaps with help from parallel streets like Kona and Waimanu. Then try King or Bereiania, either with a two-way system on one of them, or separate one-way lanes on each. West of downtown we have major opportunities along Dillingham, North King, and Nimlitz that can be tried. Preliminary discussion of street selection could be included in future neighborhood meetings that should be held on this issue.*

**Response:** The proposed BRT system is based on ridership experience of the City's existing bus services, including the recently implemented express bus services that use much of the proposed BRT alignment, forecasts of BRT and local bus ridership using regional travel forecasting models, and input received at hundreds of public outreach meetings. A test without all features of the BRT system in place (i.e., limited stop operations in exclusive and semi-exclusive lanes using low-floor vehicles with level boarding through multiple doors) would be misleading and not a true test of the system. For example, the project proposes to completely reconstruct Dillingham Boulevard through the Kaimali area to provide significant pedestrian amenities to facilitate access to BRT stations, as well as building new BRT stations and exclusive lanes in the center of the roadway. Without such major reconstruction, it would not be possible to provide the substantial time savings for transit riders through this corridor that would be offered by the BRT. Most importantly, potential new riders would not likely perceive the demonstration service as permanent.

43. *Modifications would have to be made to prepare the streets, including barricading the transit lanes to keep the cars out. Selective street widening at certain transit stops would help enhance traffic flow.*

**Response:** Dedicated BRT lanes will be identified by colored pavement, but otherwise will look the same as the rest of the street. There will be some enforcement mechanism developed to

discourage private vehicles from entering BRT-exclusive lanes. These enforcement mechanisms may be in the form of lines for entering BRT-exclusive lanes, similar to the lines imposed on the existing HOV lanes.

Streets will be widened at certain locations to accommodate transit stops and traffic flow.

44. *For the program to succeed it would need adequate parking lots in the outskirts, such as at Waikale and Aloha Stadium, and there should be efficient feeder and circulator buses available to bring passengers to and from the main line.*

**Response:** There is a transit center/park-and-ride facility proposed for Aloha Stadium that will provide a transfer point for circulator buses from the neighborhoods to the transit center.

45. *Now is a good time to consider rail, for we are not yet firmly committed to a particular plan.*

**Response:** The City Council selected BRT as the Locally Preferred Alternative in November 2000.

46. *Where is the BRT being used elsewhere?*

**Response:** See response to comment #19.

The BRT is based on the most ubiquitous technology around the world--the bus. It has been continually improved and updated with BRT being the most recent application of this proven technology. The key BRT features being proposed in Honolulu have been tested and proven in cities throughout the world including Curitiba and Sao Paulo, Brazil; Brisbane and Adelaide, Australia; Auckland, New Zealand; Vancouver and Ottawa, Canada; Dublin Ireland; and Nagoya, Japan; as well as New York City, Los Angeles, Pittsburgh, and Orlando in the U.S.

47. *What problems does the system in Trieste have? What is the population of Trieste? How does this being a European system make the results less applicable here?*

**Response:** Progress in implementing the STREAM (touchable embedded-plate) system in Trieste, Italy was delayed due to the need to re-design the pre-cast concrete channels and metal cover plates that house the cables that supply power to the embedded-plate modules. After the initial installation was completed in mid-1999, it was found that the U-shaped channels were undersized and the cover plates were not sturdy enough to support the weight of trucks and other heavy vehicles that travel across or in the same lane as the STREAM buses. The initial installation was removed and larger, stronger channels and cover plates were placed in the roadway to support the embedded-plate modules. The re-installation was completed in Fall 2001 and the system has been undergoing certification testing since July 2001. The population of Trieste is approximately 223,000. The STREAM technology will have to undergo additional safety certification in the U.S.

48. *Can you put light rail back into the analysis as a viable alternative to be considered, and adopted?*

**Response:** See response to comment #45.

49. If we are going to take away two lanes of traffic from existing roads in town for transit, don't we have a social obligation to make sure that we get the highest possible use of those lanes for moving people?

**Response:** See response to comment #28.

50. Is it not possible that LRT ridership would grow after 2025? Why is your time frame only 2025? How long would the system last?

**Response:** If you are asking whether the BRT ridership would grow after 2025, it is anticipated to do so. However, it is extremely difficult to plan beyond a 25-year time frame, thus the year 2025 is used as a basis of comparison. Because the BRT uses buses as its vehicle technology, it has the flexibility to accommodate expansion by adding more buses to the fleet. The various system components have different useful lives before they need to be replaced. The BRT vehicles will need to be replaced every 12 to 15 years, whereas some of the fixed facility components with proper maintenance can last 50 years or more.

51. Comfort of ride is not addressed at all in the EIS. Please respond to the following statements: Buses do not have the comfort level that rail can provide, and would thus probably not attract as many riders as a new rail system. Rail would offer a smoother, faster ride, and the vehicle would be much larger with many more seats. There can be no question that rubber-tire buses would provide a less-comfortable ride than rail. The road surface will never be smooth, and the soft suspension therefore required of buses guarantees a bouncy ride that sways back and forth. Rail on the other hand will be perfectly flat and smooth, and the vehicle will not bounce at all. This is no trivial matter, for the greater comfort level will attract many marginal potential riders. And with the greater passenger capacity there is a good chance everyone can find a seat. For all these reasons we can expect that rail ridership will turn out to be higher than bus.

**Response:** Newer low-floor buses with newer suspension systems are more comfortable than the older traditional buses. In addition, the interior of newly designed buses is quieter and the temperature better controlled than in older buses. Buses are typically designed to last only twelve years, and can be replaced with better technology sooner. Rail vehicles are typically designed to last 30 years and reflect wear (noise and worn suspension) in their mid-life. It is usually less costly to replace buses that it is to rehabilitate rail cars. Hence, comfort aspects of the ride are primarily dependent on the condition of the equipment, rather than the type of equipment. Rails also require frequent maintenance to maintain a smooth ride, similar to roads.

While comfort of ride is a factor in considering which mode to use, experience has shown that other factors such as convenience (proximity to origin and destination of the trip), overall travel time, reliability, and cost are more important. The BRT can be competitive with rail on each of these factors at a lower cost to construct.

52. Another factor not considered in the EIS is reliability. Light rail is a proven off-the-shelf technology that has been in use for a century all around the world, and has been continually updated and improved. On the other hand the proposed BRT is "vaporware" that does not even exist in standard commercial operation yet.

**Response:** See response to comment #20.

53. As far as cost, the city's own study shows that rail is not more expensive than BRT, and if you can get higher ridership with rail, would it actually be less expensive than BRT? At what point would this happen?

**Response:** It is unclear what City study is being referred to in this comment. As stated in the MIS/DEIS Chapter 2, the trackwork for the LRT system is estimated to cost substantially more than the BRT transit way. The cost differential would be \$94-\$142 million more for a 1.8 mile distance. In general, the LRT vehicle could be as much as \$2 million per vehicle and the estimated vehicle life is approximately twice that of an electric vehicle. The estimated cost of an electric vehicle is approximately \$1.4 million with a vehicle life of 12-14 years. When combining the BRT transitway cost and BRT vehicle cost including replacement vehicles, the BRT system cost is less than the cost of an LRT system.

54. Please respond to the following statements: It may well be that certain segments of the light rail trolley should be grade-separated at some key intersections, like under Kopikiani at Kalakaua, which is a very busy intersection now and could serve as a transfer hub into Waikiki.

**Response:** See response to comment #11.

55. Indeed the superiority of rail can be demonstrated by the city's own study, as shown in these excerpts from the draft EIS: "LRT technology could be configured to provide far greater peak line capacity through the use of multi-vehicle trains...higher-capacity vehicles and the ability to form trains would give LRT systems a potential operating labor advantage over BRT systems because one vehicle operator could be responsible for more passengers. If the future (beyond 2025) the additional capacity needed is so large as to require multiple units, this capability can be achieved by entraining LRT vehicles, whereas BRT vehicles cannot be entrained."

**Response:** See response to comment #28.

56. Ridership Difference because the standard LRT vehicles can carry 30 to 40 percent more passengers per vehicle than articulated electric buses, and can be entrained, fewer vehicles are needed to serve the same level of ridership. While positive from an operating cost standpoint, it results in less frequent service being needed with LRT vs. BRT systems. The service frequency difference resulted approximately 20 percent fewer riders projected to use the LRT vs. BRT system. Ridership would be different on an LRT vs. BRT system because of the differences in the frequency of service.

**Response:** Comment noted. The comment agrees with statements in Chapter 2 of the MIS/DEIS.

57. (approx \$100 million more for tracks, but local share of that is just \$30 million) Mitigating this cost differential, however, is the useful life of the transit vehicles. Potential BRT vehicles span a range, but generally require replacement at the standard replacement interval for buses of 12 to 15 years.

**Response:** This statement is not correct. See response to comment #53. Also the local FTA Section 5309 New Starts local match is expected to be 50%.

58. In contrast, LRT vehicles would require replacement at the standard LRT interval of 25 to 30 years. The longer useful life of the LRT vehicles would offset the greater initial cost for LRT vehicles.

Response: Comment noted. It is a reiteration from the MIS/DEIS.

59. Capital costs for the In-Town BRT system would be 35 percent less than with an LRT system on the same alignment. This cost difference even reflects the need to replace buses on a 12-year replacement cycle while LRT vehicles would have a 30-year useful life.

Response: The comment is incorrect. The useful life of a BRT vehicle would be 12-15 years. The LRT vehicle useful life would be 25-30 years. The In-Town BRT costs in the MIS/DEIS were \$24.5 M/mile including vehicles, but excluding transit centers. The LRT would cost about \$50M/mile including vehicles. Since the LRT vehicles have a longer useful life the net difference when comparing annualized cost would be about 35%.

60. The added cost for the LRT option reflects the high costs of trackwork, yards and shops.

Response: Comment noted. It is a reiteration from the MIS/DEIS.

61. Vehicle costs would actually be somewhat less for the LRT option when the less frequent replacement cycle and smaller fleet requirements are taken into account.

Response: Comment noted. It is a reiteration from the MIS/DEIS.

62. Annual systemwide transit operating and maintenance costs were also estimated for each alternative for the forecast year 2025. Operating and maintenance costs would be essentially the same for the LRT and BRT options. The cost per new rider gained with the LRT would be 2.8 times as costly as with the BRT.

Response: Comment noted. It is a reiteration from the MIS/DEIS.

63. No significant differences would exist between the two technologies. An advantage of stations would exist if vehicles operating in the exclusive section of the system were guided. [LRT is guided, BRT is not]

Response: Since precision docking is not possible with buses, even optically guided buses, bridge plates (metal plates that extend out from the bus at each door just prior to the doors opening) will be used to provide level boarding at the passenger platforms.

64. I'm speaking in favor of the rapid transit alternative, but not in favor of the Bus Rapid Transit alternative.

Response: Thank you for taking the time to attend the public hearing and expressing your views regarding the project and your preferences.

65. I really think that you dropped the dime when you let go of the light rail possibilities last year. I know that you did take a good look at it, and you considered the ramifications, and yet, I think you came to the wrong conclusions.

Response: Comment noted.

66. The fundamental issue here is that we do need to take away a line of traffic from the cars on our existing streets.

Response: The BRT Alternative is comprised of a mix of exclusive BRT, semi-exclusive BRT and mixed-use lanes. The BRT system strives to strike a balance between transit speed and impacts to general traffic. In segments where it was judged that roadway capacity was needed for general traffic and the BRT operation would not be significantly affected, exclusive lanes were replaced by either semi-exclusive or mixed-flow operation. In areas of high BRT ridership volumes, exclusive transit lanes were retained such as on Dillingham Boulevard and through Downtown.

67. But if we're going to take away a lane of traffic in each direction, then we have a social obligation to make the most of that lane to get the highest passenger capacity out of that lane. And that's the main factor why I disagree with your choice of vehicles.

Response: See response to comment #4.

68. As you acknowledged in the EIS, the light rail would have a much greater -- you don't say how much greater, perhaps it's buried in the details somewhere, but obviously greater capacity that would last us for many years into the future.

Response: The MIS/DEIS Chapter 2 stated that the standard LRT vehicles can carry 30 to 40 percent more passengers per vehicle than articulated electric buses.

69. Perhaps your time horizon is a bit short. The year 2025 is a Federal mandate, I understand. But looking beyond that, light rail would enable us to grow into the future. So capacity is one very big concern that I have.

Response: It is extremely difficult to plan beyond a 20 to 25-year time horizon.

70. And there's two others. One is comfort of ride. And there could be no comparison between light rail and a bus on rubber tires, even if you have cement road bed. I'm sorry. The difference is an extreme difference. The light rail is going to be smoother, flatter, more comfortable, and with greater capacity, more seats, so people can be sitting down, and it will attract more riders.

Response: The comfort of the ride is dependent upon frequent maintenance of the roads or rails and replacement of suspension systems at appropriate intervals as recommended by the vehicle manufacturer.

Newer low-floor articulated buses do provide appropriate comfort levels and convenient egress similar to rail transit. The BRT can be designed to increase potential capacity by implementing well-planned stops, efficient dwell times, restricted right-of-ways, and streamlined fare collection. Traffic signal pre-emption can further alleviate congestion.

While comfort of ride is a factor in considering which mode to use, experience has shown that other factors such as convenience (proximity to origin and destination of the trip), overall travel time, reliability, and cost are more important. The BRT can be competitive with rail on each of these factors at a lower cost to construct.

71. The third concern is reliability of the system. All around the world there are many, many light rail systems. I've had the good fortune to be able to ride on 29 different rail rapid transit systems in

Mr. Dennis Callan  
Page 16  
November 13, 2002

*my travels around the world, so I bring you this little perspective that this is a proven technology that's been around for a century, it's constantly being improved, upgraded, modified and enhanced. It's off-the-shelf technology.*

*The BRT is vaporware. It does not exist. Perhaps, in four years, it might exist, perhaps not. And it will be a prototype. Do we want to be beta testers for an unproven system? Or wouldn't we be better off going with a proven light rail system.*


**Response:** No technology will be implemented before it is service proven. The decision has been made to implement hybrid-electric buses initially for the In-Town BRT while viable long-term technologies are being proven in service elsewhere. Conventional light rail was rejected early on by attendees at the various public meetings since it required overhead wires for traction power.

72. *And a final comment, if you could merely give a response to these statements as part of the EIS process. And put light rail back into consideration.*

**Response:** See responses to all previous comments (#1-#71).

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

  
CHERYL D. SOON  
Director

City Council  
City and County of Honolulu

RECEIVED

Oct 27 1 21 PM '00

CITY CLERK  
I am here to express my opposition to the dedicated lanes in the Primary Corridor Transportation Project DEIS.

Since express bus stops are relatively far apart (1/4 to 1/2 mile), dedicated lanes will not eliminate the need for non-express buses using the remaining undedicated lanes. Also, the stations along the routes will take up a partial lane. Automobiles will be virtually restricted from these routes. Residents and businesses will be inconvenient.

The DEIS doesn't address the current automobile capacity of these routes and the projected reduction in automobile capacity after the dedicated lanes and stations are built and non-express buses are added. Since vehicles will find alternative routes, the DEIS doesn't address the negative impact that diverted traffic has on other main and neighborhood streets. Also, the negative impacts on north/south streets were not considered in the DEIS. The large parking spaces of the proposed Wai-Mart development and expanded Ala Moana Center are negatively impacted but not considered in this transportation DEIS.

The Bus Rapid Transit is not needed, since some Neighborhood Boards see little growth in the Primary Urban Center for the next 25 years. Families want to go out to Central Oahu and Ewa. Businesses will follow.

I support Makiki/Lower Punchbowl/Tantalus Neighborhood Board motions:

- 1) Against Bus Rapid Transit with dedicated lanes
- 2) For TSM alternative, Hub-&Spoke Bus Network without in-town dedicated lanes.

  
Charles H. Carole  
Makiki Resident

Ms. Cheryl Soon  
Director

Department of Transportation Services  
City and County of Honolulu  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813

Dear Ms. Soon:

11/05/00

Page 2

projected.

6) **BEST ALTERNATIVE PREFERENCE:** the Transportation System Management alternative, the Hub-and-Spoke Bus Network, should be fully implemented with its highway improvements. The system should be completed and given a reasonable operational period to be evaluated. The DEIS doesn't discuss this option.

**SUBJECT: Major Investment Study/ Draft Environmental Impact Statement for Primary Corridor Transportation Project**

I consider this DEIS to have major deficiencies in the following items:  
1) **Corseable, Increased Congestion and Gridlock:** the DEIS doesn't address the current vehicle capacity of the transit routes and the projected reduction in vehicle capacity after the dedicated lanes and stations are built and lanes for non-express buses are added. Since vehicles will find alternative routes, the DEIS doesn't address the negative impact that diverted has on other main and neighborhood streets. Also, the negative impacts on north/south streets were not considered in the DEIS. The use of large amount of parking at the proposed Wal-Mart development and the expanded Ala Moana Center will cause congestion but not considered in this DEIS.

2) **RIDERSHIP:** the DEIS doesn't give a true picture of the bus ridership situation. Since 1995 the annual ridership has gone down from 80 million to 69 million in 1999, this occurs at the time with increase in number of buses in the system and added routes. On top of this situation, the DEIS is projecting a 74% ridership increase for 2025 from the 1999 figure. A shortfall in ridership will have negative impact on the fiscal affordability of the transportation system. The adjustment to the 2025 population projection (Table 4.2-8) shows increased non-construction employment, but is the increased employment in Ewa and Central Oahu, not in the in-town area. The DEIS doesn't specified where the growth area will be.

3) **PRIMARY URBAN CENTER DEVELOPMENT PLAN (PUCDP):** the DEIS should consider the public comments on the 1999 proposed PUCDP which were against higher density and flexible development standards. A new PUCDP should be approved before considering the drastic change contemplated by the Bus Rapid Transit (BRT) and its dedicated lanes.

4) **PROJECT COSTS AND TAXES:** the DEIS says that the type of BRT system hasn't been selected yet. How much risk is there in the BRT cost in being much higher? The DEIS makes a point that there will be no new taxes, but I assume that this means no new form of tax, only an increase in existing form of taxes.

5) **FLAWED DEIS ASSUMPTIONS:** the DEIS doesn't address possibility with higher congestion that businesses would move out to Ewa and Central Oahu to be closer to resident homes, thus reducing the trips to the in-town area of the PUC. Also, with changing work habits over the next 25 years, there will be decentralization of businesses throughout Oahu. It is difficult to plan and build for 2025, when things are changes. If this plan was done in 1975, our growth would be much smaller than

Sincerely,



Charles H. Carole  
1310 Heulu Street, Apt. 1002  
Honolulu, HI 96822

May 5, 2002

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3rd Floor  
Honolulu, Hawaii 96813

Dear Ms. Soon:

Subject: Primary Corridor Transportation Project  
Supplemental Draft Environmental Impact Statement  
Comments and Concerns

In response to the Primary Corridor Transportation Project Supplemental Draft Environmental Impact Statement (SDEIS) dated March 2002, I wish to raise the following questions and concerns.

**PAGE 1-3 PURPOSE**

**1. Increase the people-carrying capacity of the transportation system in the primary transportation corridor by providing attractive alternatives to the private automobile.**

This project purpose would not only deprive private automobiles from lane spaces, but also commercial automobiles and trucks which will raise business costs and will eventually cause raising vacancy rates for offices and stores in the Primary Urban Center (PUC). Also, Costco is moving into the Iwilei area in June 2002 and most customers will carry their large quantity of purchased-goods in cars, not on public transportation. It will be interested how big box businesses will be affected by restricted traffic lanes. Your SDEIS didn't speak to this economic impacts in Chapter 5-Environmental Analysis and Consequences (pages 5-15 to 5-20), but only spoke about employment of construction and transit workers. The section didn't discuss the economic effects on area businesses like automobile dealers, supply dealers and others.

**2. Support desired development patterns.**

The desired development patterns were stated in a 1980's PUC Development Plan (DP) which hasn't been changed with changing economic and social events in the last twenty years. The Department of Planning and Permitting (DPP) has been trying since 1996 to revise the old PUCDP. They came out with a draft DP in July 1999 but it was dropped and they had additional public meetings in April and June 2001. DPP began to write up the plan in late 2001 and hope to disclose the plan to public soon. The adoption of a new Development Plan should precede the designing of transit stations and other facilities in the in-town area of the PUC.

**Page 1-4 The PUC is by far the most populated DP Area with 432,000 people (52 percent of the island total) in 1990.**

**Page 1-7 Oahu's population increased at an average annual rate of 1.63 percent during the twenty-year period from 1970 to 1990.**

**Page 1-7 Table 1.2-1 Projected Population Summary.**

It is laughable situation how the writers of this SDEIS avoid using Census 2000 figures throughout this document. The Census 2000 population figures for 8 DP areas were available in April 2001. Oahu's population increased at an average annual rate of 0.48 percent during the ten-year period from 1990 to 2000. Instead of 1.63 percent for the twenty-year period between 1970 and 1990. The total projected population for 2025 is about 985,000 based on an average annual rate of 0.48 percent, instead of 1,029,800 for 2025. The table uses a 1997 estimated population figure which is based on 1990 Census figures when the 2000 Census figures are available. The DP's population figures are

showing a shift from a negative growth for the PUC to a higher positive growth for Ewa, Central Oahu and Waianae. The other DP areas had only modest population growth. When the employment figures are derive from 2000 Census, we might find that the annual employment increase of 0.89 percent over the 1997 to 2025 period is too high and the location of these is probably shifting away from the PUC. SDEIS 2025 BRT ridership figure is very inflated.

**Page 1-8 Redevelopment in the PUC is designated primarily for the area makai of the H-1 Freeway between Middle Street and Kapahulu Avenue.**

This redevelopment designation appeared in the July 1999 PUCDP which DPP has abandoned. DPP is now finishing a second draft. This statement about the redevelopment is little premature at this time.

**Page 1-12 Table 1.2-6 Resident Person Trip Travel Demand Within Selected Travel Markets**

Was 1995 year selected because the total passengers for Oahu bus system were almost 79 million while the 2000 total passengers were about 69 million?

**Page 3-26 Table 3.3-1 Population Growth by Neighborhood (1980-1990)**

DPP supply me with neighborhood population growth between 1990 and 2000 in November 2001. Some of your tables were dated November 2001 and March 2002. Some of the neighborhood characteristics were also provided in November 2001. Please use updated figures for the SDEIS.

**Page 4-7 Table 4.1-6 Projected 2025 Transit Travel Time Within the Urban Core**

In the section on Page 4-6 preceding the table only compared No-Build Alternative with the Planned BRT and not the TSM Alternative. The longest difference between TSM and BRT was about 9 minutes and the shortest was 0.1 minutes. The time savings is very little between the TSM and BRT when you consider the economic and social harmful effects of the exclusive lanes.

**Page 4-12 4.2.3 Traffic Operations at Intersections**

SDEIS didn't specified how many private cars and commercial vehicles would be displaced by exclusive lanes of the BRT. It only stated that they would be displaced. The actual number of passenger and commercial vehicles that would be prevented from using the following streets between 5 AM to 7 PM weekdays are: Kapolani Blvd.--20,252 vehicles, Ala Moana Blvd.--19,096 vehicles, Dillingham Blvd.--15,227 vehicles, and King Street--11,298 vehicles. Eliminating these vehicles from these Honolulu streets will have adverse financial and social impacts on residents and commercial firms. Some of these displaced vehicles will be forced to travel through adjacent neighborhood streets endangering the safety of residents. There will probably be a shift of traffic throughout the in-town area.

**Chapter 6--Financial Analysis and Appendix E--BRT Cash Flow Analysis**

The City claims that the BRT will not require any increases in taxes, but the City will have to increase its subsidy to the Public Transportation System from its general revenue. This might cause the City to cut its budget or raise taxes, if it has to balance the budget.

The actual figures are cited from the City's Comprehensive Annual Financial Report for FYs 2000 and 2001.

The actual operating and maintenance (O&M) costs for FYs 2000 and 2001 were respectively, \$130.4 million and \$140.3 million. In the August 2000 DEIS, the estimate for FY 2001 O&M was \$122 million, a \$18 million or 15 percent difference between the actual and estimated figures. In addition, their estimate in the SDEIS for FY 2002 O&M costs is \$126.6 million which is almost \$14 million less than the actual FY 2001 O&M costs of \$140.3 million. But if you look at the actual O&M costs for FYs 1999 to 2001, you would find a \$10 million growth in the O&M costs each year. Thus the FY 2002 O&M costs might be \$150 million instead of \$126.6 million as estimated in the SDEIS. This represents a \$24 million difference instead of a \$14 million difference. Remember these are their early FYs estimations, what credibility or confidence can you have in their other projections to FY

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE Y. YAMAMOTO  
DEPUTY DIRECTOR

TPD1100-05370R  
TPDS02-01834R

November 13, 2002

Mr. Charles H. Carole  
1310 Heulu Street, Apt. 1002  
Honolulu, Hawaii 96822

Dear Mr. Carole:

Subject: Primary Corridor Transportation Project

This is a combined response to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your October 12, 2000 oral testimony at the public hearing, your October 26, 2000 letter, and your November 5, 2000 letter regarding the MIS/DEIS. Part B responds to your oral testimony at the April 20, 2002 SDEIS public hearing.

Part A - MIS/DEIS Comments

1. *There were some things that -- omissions in the DEIS that I would like to see put in. For example, ridership from 1995 to 1999, it's gone from 80 million people annually down to 69 million people. So there's been a decrease of ridership in the system already. And I'm curious why this wasn't even mentioned in the DEIS.*

**Response:** There has been a decline not only in transit usage, but in auto usage as well during this period. This is considered to be an aberration due to the downturn in the economy, and is not expected to be the case for the long term. Cities that have implemented BRT routes, such as Los Angeles have seen a dramatic shift from autos to those routes.

2. *Also, at the same time, the amount of registered automobiles on Oahu has also gone down between 1995 and 1998, the latest figures I could get, so that we're having less automobiles registered in Oahu.*

**Response:** You are correct, the motor vehicles registered in the City and County of Honolulu decreased from 601,239 in 1995 to 594,096 in 1998; however, in 1988 motor vehicle registrations started to increase and there were 597,610 vehicles registered in the City and County of Honolulu in 1988. According to *The State of Hawaii Data Book, 2001*, the motor vehicles registered in Honolulu totaled 631,232.

3. *Now, the other problem that the DEIS has is that it sort of concentrates -- it thinks that all growth is going to happen in the Primary Urban Center. Unfortunately, we do have other things going on. At the same time, Kapolei and also Central Oahu, especially in the acreage of agricultural lands that is slowly being not seeded, so that the traffic is really going to be going, by 2025, to Kapolei*

2025?

Since the general fund revenues provide 71 percent of O&M funding, O&M subsidies grows faster than the projected subsidies in the BRT cash flow analysis. The Public Transportation System required \$112 million O&M subsidies to balance the actual FY 2001 operating revenues and expenditures. The August 2000 DEIS estimation for FY 2001 O&M subsidies was \$78 million. The difference between the actual and estimated O&M subsidies was 43.5 percent. Again we are dealing with a first year estimation that is so far off of the mark. In the SDEIS, they project the annual O&M subsidies for FYs 2002 to 2025 to run from \$81 million to \$277 million. Since their estimate for FY2001 O&M subsidies was off by 43.5 percent, I can see the BRT causing a rise in taxes.

Sincerely,

*Charles H. Carole*

Charles H. Carole  
1310 Heulu Street, Apt. 1002  
Honolulu, HI 96822

cc: OECC Ms. Genevieve Salmonson, Director  
Councilmember Ann H. Kobayashi

and to Central Oahu. And a large -- the population, each time they do a census, moves farther and further away from the Primary Urban Center, so that we're really not going to have that much growth within the urban center.

**Response:** Not all growth is assumed to occur in the PUC. The Refined LPA is intended to support land use objectives of the Public Review Draft of the Primary Urban Center Development Plan (June 1999), which promotes the concept of "urban villages", a mix of residential, employment and commercial land uses, and the Ewa Development Plan, which seeks to encourage a mix of residential, commercial and employment growth and development in and around the City of Kapolei.

4. **Now we have -- one of the proposals is the dedicated lanes. Now, with the dedicated lanes will cause congestion over the local streets beyond the peak hours and would harm the adjacent neighborhoods with greater traffic through the local streets. People will find other ways of getting around, and they will go through the local streets. And this is not addressed in the DEIS.**

**Response:** It is not the conversion of lanes that will create the congestion. The congestion for motorists will be there without the BRT. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

5. **Also, traffic would be affected around places like Wal-Mart; the proposed site for Wal-Mart, and other developments. Again, this is not covered in the DEIS.**

**Response:** One lane in each direction on Kapiolani Boulevard will be converted to exclusive BRT use between Pensacola Street and Aukinson Drive. This reallocation will result in slightly increased delay for motorists at intersections within this segment of Kapiolani Boulevard. At the same time, delay to BRT vehicles is projected to be significantly less than vehicles in the general-purpose lanes, resulting in increased transit ridership and increased person throughput along Kapiolani Boulevard. Any diversion of traffic is expected to shift to the King-Beretania corridor. The east-west roadways within the Sheridan block do not continue west of Pensacola Street, making them inconvenient alternatives to Kapiolani Boulevard. Additionally, these east-west roadways are expected to serve more of a circulation function given the future development of Wal-Mart and Sam's Club in the "Super Block" area.

6. **Second -- third, there will be congestion on roads from the sea to the mountain areas.**

**Response:** The BRT routes for the Refined LPA are located primarily on Koko Head-Ewa oriented roadways. The response to comment 5 addresses the impact to these roadways. The only mauka-makai roadways used are Pensacola Street and University Avenue and the analyses in the FEIS show that they are able to accommodate the BRT lanes. Additionally, while traffic signal priority is proposed to help facilitate BRT vehicles through intersections, the signal priority will not be implemented in a manner that is detrimental to mauka-makai traffic flow.

7. **And the fourth thing is the time-saving with these dedicated lanes is really not that great. And I find that buses are quite adequate now.**

**Response:** Table 4.3-5 in the FEIS compares projected year 2025 peak hour transit travel times within the primary corridor. Within the urban core, travel time differences between the Refined LPA and the No-Build Alternative are approximately 2 minutes under average conditions. This

reflects that effectiveness of the limited stop transit routes (CityExpress) already operating. The key difference would be that travel times for the BRT on dedicated lanes would be more reliable, even during major traffic incidents. This consistency is important to transit patrons.

8. **The last thing would be the idea that there's no new taxes. There will be taxes. They will be raising our real estate taxes to pay for the City's subsidies that have to be made each annual budget period.**

**Response:** The BRT reflects a prudent approach to meeting future transportation needs without having to raise taxes to implement and operate it. The costs for increases in labor costs, fuel costs, insurance, etc. are accounted for in the financial plan based on historical levels of escalation of these factors. Since the BRT is a bus based system, a great deal of flexibility exists to alter future operations, fare levels, and/or city subsidy to meet higher than forecast escalation in any of these variables.

9. **Since express bus stops are relatively far apart (1/4 to 1/2 mile), dedicated lanes will not eliminate the need for non-express buses using the remaining undedicated lanes.**

**Response:** The BRT is meant to complement the local bus service in the Primary Transportation Corridor by providing a faster more reliable service for riders by offering limited stop operations in bus priority lanes.

10. **Also, the stations along the routes will take up a partial lane. Automobiles will be virtually restricted from these routes. Residents and businesses will be inconvenienced.**

**Response:** At the locations of the proposed transit stops, lanes will be maintained to accommodate mixed-traffic. The transit stops are located to have the least impact to residential and business access.

11. **The DEIS doesn't address the current automobile capacity of these routes and the projected reduction in automobile capacity after the dedicated lanes and stations are built and non-express buses are added.**

**Response:** Chapter 4 of the FEIS presents a quantitative analysis of the effects of converting lanes along the In-Town BRT alignment.

12. **Since vehicles will find alternative routes, the DEIS doesn't address the negative impact that diverted traffic has on other main and neighborhood streets.**

**Response:** Chapter 4 of the FEIS discusses impacts to other streets off of the In-Town BRT alignment.

13. **Also, the negative impacts on north/south streets were not considered in the DEIS.**

**Response:** Chapter 4 of the FEIS discusses impacts to mauka/makai streets.

14. **The large parking spaces of the proposed Wal-Mart development and expanded Ala Moana Center are negatively impacted but not considered in this transportation DEIS.**

**Response:** The Refined LPA significantly enhances transit service within the Kapiolani Boulevard corridor. This increased transit service would enable more customers to utilize transit to travel to



Ala Moana Center and the Wal-Mart superblock. The large transit center at Ala Moana Center illustrates the importance of transit to these large retail developments. A larger transit share of shoppers would benefit Ala Moana Center by either delaying or eliminating the need to construct more parking. With regard to the parking at Wal-Mart and Ala Moana Center being used as a park-and-ride by BRT riders, in the case of the future Wal-Mart, its parking would likely be fully utilized by its customers. It is unlikely that large numbers of BRT riders would park their vehicles at either development. Currently, Ala Moana Center tickets of people who are not shopping or attending to business at one of the two Ala Moana offices (towers or the Ala Moana Hotel).

15. The Bus Rapid Transit is not needed, since some Neighborhood Boards see little growth in the Primary Urban Center for the next 25 years. Families want to go out to Central Oahu and Ewa. Businesses will follow.

**Response:** The Refined LPA is intended to support existing land uses and is consistent with the objectives of the Public Review Draft of the Primary Urban Center Development Plan (June 1999), which promotes the concept of "urban villages", a mix of residential, employment and commercial land uses, and the Ewa Development Plan, which seeks to encourage a mix of residential, commercial and employment growth and development in and around the City of Kapolei.

16. I support Makii/Lower Punchbowl/Tantalus Neighborhood Board motions: 1) Against Bus Rapid Transit with dedicated lanes 2) For TSM alternative, Hub-&-spoke Bus Network without in-town dedicated lanes.

**Response:** Comment noted.

17. The DEIS doesn't address the current vehicle capacity of the transit routes and the projected reduction in vehicle capacity after the dedicated lanes and stations are built and lanes for non-express buses are added.

**Response:** In those places where some lanes will be dedicated for the exclusive use of BRT, the total people carrying capacity of the effective roadway will increase.

The BRT vehicles will operate at short intervals, as often as every two minutes or less during the morning and evening peak periods, and 4- to 8-minute intervals during off-peak hours. With a standard occupancy level of 75 percent, each BRT vehicle will be carrying the equivalent number of passengers as 65 automobiles at a 1.2 passengers/vehicle occupancy. Since a typical highly utilized arterial traffic lane carries about 500 vehicles per hour during peak periods, the BRT will be accommodating two to four times as many people as the adjacent traffic lane, depending on the frequency of BRT service along that section of the alignment.

18. Since vehicles will find alternative routes, the DEIS doesn't address the negative impact that diverted has on other main and neighborhood streets.

**Response:** See response to comment #4.

19. Also, the negative impacts on north/south streets were not considered in the DEIS.

**Response:** The traffic impact analyses presented in Chapter 4 of the FEIS reflect mauka/makai streets as well as Ewa/Koko Head streets.

20. The use of large amount of parking at the proposed Wal-Mart development and the expanded Ala Moana Center will cause congestion but not considered in this DEIS.

**Response:** See response to comment #14.

21. The DEIS doesn't give a true picture of the bus ridership situation. Since 1995 the annual ridership has gone down from 80 million to 69 million in 1999, this occurs at the time with increase in number of buses in the system and added routes.

**Response:** See response to comment #1.

22. On top of this situation, the DEIS is projecting a 74% ridership increase for 2025 from the 1999 figure. A shortfall in ridership will have negative impact on the fiscal affordability of the transportation system.

**Response:** In the event actual ridership does not grow at the same pace as forecasted, the purchase and deployment of buses can be scaled back so as not to outpace available funding.

23. The adjustment to the 2025 population projection (Table 4.2-8) shows increased non-construction employment, but is the increased employment in Ewa and Central Oahu, not in the in-town area. The DEIS doesn't specify where the growth area will be.

**Response:** Table 4.2-8 of the DEIS was intended to demonstrate a sensitivity analysis between the original population and employment forecast used in the transportation demand analysis and the revised forecast. Updated information on the geographic distribution of population and employment growth is provided in Section 1.2 of the FEIS.

24. The DEIS should consider the public comments on the 1999 proposed PUCDP which were against higher density and flexible development standards. A new PUCDP should be approved before considering the drastic change contemplated by the Bus Rapid Transit (BRT) and its dedicated lanes.

**Response:** There is no indication of when the updated Primary Urban Center Development Plan (PUC DP) will be adopted by the City Council. The environmental review process of the Primary Corridor Transportation Project (PCTP) cannot be delayed pending this outcome. The In-Town BRT has been designed to support current land uses and future land use patterns, particularly in vacant and underutilized parcels in Kakaako, Iwilei, and near Ala Moana Center and the Convention Center. These are the locations where development is likely to occur with or without the PCTP. Because of this, the Refined LPA has been evaluated in the FEIS as being consistent with the Public Review Draft of the PUC DP (May 2002), as well as the current PUC DP adopted in 1990. However, even if there is a re-emphasis, we find it doubtful that the DPP and ultimately the City Council would abandon all efforts for urban infill and prevention of urban sprawl in our agricultural and rural areas of central and leeward Oahu.

25. The DEIS says that the type of BRT system hasn't been selected yet.

**Response:** The long-term vehicle propulsion technology has not yet been selected. The implementation plan is to use hybrid-electric buses initially for the In-Town BRT, and in 2008 make a decision on whether to continue with this technology or to replace it with embedded plate technology (EPT).

26. How much risk is there in the BRT cost in being much higher?

**Response:** There is a 25 percent estimating contingency already built into the projected capital cost. The cost estimate is based on the most costly BRT technology, EFT.

27. The DEIS makes a point that there will be no new taxes, but I assume that this means no new form of tax, only an increase in existing form of taxes.

**Response:** This project has been developed following City Council policy to not increase taxes. The financial analysis (Chapter 9 of the FEIS) shows that no increases in existing taxes or new taxes will be required to fund the project as proposed.

28. The DEIS doesn't address possibility with higher congestion that businesses would move out to Ewa or Central Oahu to be closer to resident homes, thus reducing the trips to the in-town area of the PUC.

**Response:** The growth forecasts used in the PCTP do include a redistribution of businesses to Ewa and Central Oahu, as well as retention of existing businesses in the PUC.

29. Also, with changing work habits over the next 25 years, there will be decentralization of businesses throughout Oahu. It is difficult to plan and build for 2025, when things are changing. If this plan was done in 1975, our growth would be much smaller than projected.

**Response:** Since the BRT is a bus based system, a great deal of flexibility exists to alter future operations to be in sync with shifts in population levels and/or distribution.

30. The Transportation System Management alternative, the Hub-and-Spoke Bus Network, should be fully implemented with its highway improvements. The system should be completed and given a reasonable operational period to be evaluated. The DEIS doesn't discuss this option.

**Response:** The Refined LPA will be phased in over a 15-year period, starting with conversion of the bus system to a hub-and-spoke configuration. During the early stages the Refined LPA will operate very much like the TSM Alternative.

Part B - SDEIS Comments

31. I'm with the Makiki/Lower Punchbowl/Tantalus Neighborhood Board. To begin with, we believe that the present bus system is excellent.

**Response:** Comment noted.

32. And we supported the Transportation System Management Plan, which includes hub-and-spoke transit centers, park-and-ride sites, ramps to the H-1, Express buses for Regional BRT, and buses in the in-town portion without - now I specify - without dedicated lanes. We are against the BRT with its exclusive lanes.

**Response:** Comment noted.

33. Now, we're getting a little perturbed with some of the statements that the DTS and also even the City Council - some members of the City Council says the BRT will not require any increase in taxes.

**Response:** Comment noted.

34. Now, in fiscal year 2001, using the official report of the Department of Budget and Finance, they said that the operating cost was 140 million for the transportation, and that's the City's subsidy. Capital input into it was \$117 million. When you looked at the estimate that the City put in their 2000 EIS, they indicated, for 2001, that the thing would be - that the operating cost would be \$122 million. They were \$18 million off on the first year of their projections. Can you imagine what they will be 25 years from now?

**Response:** The number cited from the FY 2001 Department of Budget and Finance Report includes depreciation on the bus fleet as well as direct operating cost. Depreciation is not an actual Operating and Maintenance Cost, which is what was shown in the SDEIS and now in the FEIS.

35. Now, the City is faced with it. They're broke. And the chief of the City Council budget committee said, "We're broke" and they're now considering raising taxes as one of the options. So - or else they'll raid a special fund, which they're supposed to put back at some later date. It seems to me that the City is deferring all their costs for some other time.

**Response:** Comment noted. It is beyond the project scope to analyze the City's entire budget.

36. EIS, the Draft Supplemental EIS does not make any statement about the business, the impact on private firms along the corridor.

**Response:** Business impacts of the BRT Alternative were addressed in various sections of the MISDEIS, SDEIS and FEIS, including Sections 5.1, 5.2, 5.3 and 5.12.11.

37. They do not indicate where the traffic will go if it doesn't go along Kapiciani, Ala Moana, or University Avenue. Where is it going to go?

**Response:** See response to comment #4.

38. They're also now blocking off King Street.

**Response:** There are no plans as part of the Refined LPA to block off King Street.

39. Can you imagine - last week they were fixing two lanes on - at the point of Dillingham, King and Benelania. The traffic on Benelania at four, five o'clock, was all the way over to Pensacola. This is not a good solution. What they should go back to is the TSM, and that's what they should do.

**Response:** Comment noted. It is a statement of preference for the TSM Alternative.

40. 1. Increase the people-carrying capacity of the transportation system in the primary corridor by providing attractive alternatives to the private automobile. This project purpose would not only deprive private automobiles from lane spaces, but also commercial automobiles and trucks which will raise business costs and will eventually cause raising vacancy rates for offices and stores in the Primary Urban Center (PUC).

Response: See response to comment #4.

41. Also, Costco is moving into the Iwilei area in June 2002 and most customers will carry their large quantity of purchased-goods in cars, not on public transportation. It will be interesting how big box businesses will be affected by restricted traffic lanes. Your SDEIS didn't speak to this economic impacts in Chapter 5-Environmental Analysis and Consequences (page 5-15 to 5-20), but only spoke about employment of construction and transit workers. The section didn't discuss the economic effects on area businesses like automobile dealer, supply dealers and others.

Response: The BRT is not intended to replace the automobile, but to give people an alternative to driving a car for certain types of trips. Impacts to businesses, to the extent they can be quantified are discussed in Chapter 5 of the FEIS.

42. Support desired development patterns. The desired development patterns were stated in a 1980's PUC Development Plan (DP) which hasn't been changed with changing economic and social events in the last twenty years. The Department of Planning and Permitting (DPP) has been trying since 1996 to revise the old PUCDP. They came out with a draft DP in July 1999 but it was dropped and they had additional public meetings in April and June 2001. DPP began to write up the plan in late 2001 and hope to disclose the plan to public soon. The adoption of a new Development Plan should precede the designing of transit stations and other facilities in the in-town area of the PUC.

Response: There is no indication of when the updated Primary Urban Center Development Plan (PUC DP) will be adopted by the City Council. The environmental review process of the Primary Corridor Transportation Project (PCTP) cannot be delayed pending this outcome. The In-Town BRT has been designed to support current land uses and future land use patterns, particularly in vacant and underutilized parcels in Kakaako, Iwilei, and near Ala Moana Center and the Convention Center. These are the locations where development is likely to occur with or without the PCTP. Because of this, the Refined LPA has been evaluated in the FEIS as being consistent with the Public Review Draft of the PUC DP (May 2002), as well as the current PUC DP adopted in 1990.

43. Page 1-4 The PUC is by far the most populated DP Area with 432,000 people (52 percent of the island total in 1990. Page 1-7 Oahu's population increased at an average annual rate of 1.63 percent during the twenty-year period from 1970 to 1990. Page 1-7 Table 1.2-1 projected population summary. It is laughable situation how the writers of this SDEIS avoid using Census 2000 figures throughout this document. The Census 2000 population figures for 8 DP areas were available in April 2001. Oahu's population increased at an average annual rate of 0.48 percent during the ten-year period from 1990 to 2000, instead of 1.63 percent for the twenty-year period between 1970 and 1990. The total projected population for 2025 is about 985,000 based on an average annual rate of 0.48 percent, instead of 1,029,800 for 2025. The table uses a 1997 estimated population figure which is based on 1990 Census figures when the 2000 Census figures are available. The DP's population figures are showing a shift from a negative growth for the PUC to a higher positive growth for Ewa, Central Oahu and Waianae. The other DP areas had only modest population growth. When the employment figures are derived from 2000 Census, we might find that the annual employment increase of 0.89 percent over the 1997 to 2025 period is too high and the location of these is probably shifting away from the PUC. SDEIS 2025 BRT ridership figure is very inflated.

Response: The SDEIS used the census information contained in the MISDEIS, which at the time it was prepared in mid-2000, year 2000 census information at the DP level was not available. No changes were made because DP population information is not relevant to the elements of the project covered by the SDEIS, but is relevant to the overall project. Therefore, the FEIS uses the most up to date 2000 census information available.

The projected year 2025 employment used as input into the travel demand model runs used for the FEIS is identical to the 2025 employment used for the Oahu Regional Transportation Plan (ORTP) Update conducted by the Oahu Metropolitan Planning Organization (OMPO). The employment projection was developed statewide and disaggregated to the county level by the State of Hawaii Department of Business, Economic Development and Tourism (DBEDT). The City and County of Honolulu Department of Planning and Permitting then allocated the countywide employment forecast to the traffic analysis zone level. A similar procedure was used for employment. The OMPO Policy Committee then adopted the resulting population and employment forecasts as the regional long-range socio-economic forecasts.

44. Page 1-8 Redevelopment in the PUC is designated primarily for the area makai of the H-1 Freeway between Middle Street and Kapahulu Avenue. This redevelopment designation adopted in the July 1999 PUCDP which DPP has abandoned. DPP is now finishing a second draft. This statement about the redevelopment is little premature at this time.

Response: There is no indication of when the updated Primary Urban Center Development Plan (PUC DP) will be adopted by the City Council. The environmental review process of the Primary Corridor Transportation Project (PCTP) cannot be delayed pending this outcome. The In-Town BRT has been designed to support current land uses and future land use patterns, particularly in vacant and underutilized parcels in Kakaako, Iwilei, and near Ala Moana Center and the Convention Center. These are the locations where development is likely to occur with or without the PCTP. Because of this, the Refined LPA has been evaluated in the FEIS as being consistent with the Public Review Draft of the PUC DP (May 2002), as well as the current PUC DP adopted in 1990.

45. Page 1-12 Table 1.2-6 Resident Person Trip Travel Demand Within Selected Travel Markets. Was 1995 year selected because the total passengers for Oahu bus system were almost 79 million while the 2000 total passengers were about 69 million?

Response: The FEIS uses year 2000 as the base year. The DEIS utilized an earlier version of the travel demand model maintained by the Oahu Metropolitan Planning Organization (OMPO). It used year 1995 as the base year. As part of the Oahu regional transportation plan update, Transportation for Oahu Plan (TOP 2025) the base year was changed to year 2000. This updated model was used for the analyses documented in the FEIS, so that the forecasting results would be consistent with the TOP 2025.

46. Page 3-26 Table 3.3-1 Population Growth by Neighborhood (1990-1990). DPP supply me with neighborhood population growth between 1990 and 2000 in November 2001. Some of your tables were dated November 2001 and March 2002. Some of the neighborhood characteristics were also provided in November 2001. Please use updated figures for the SDEIS.

Response: None of the tables in Section 3.3 of the SDEIS, Neighborhoods, used sources dated November 2001 or March 2002. Please see response regarding year 2000 census information above.

Mr. Charles H. Carole  
Page 10  
November 13, 2002

47. Page 4-7, Table 4.1-5 Projected 2025 Transit Travel Time Within the Urban Core. In the section on Page 4-6 preceding the table only compared No-Build Alternative with the Refined BRT and not the TSM Alternative. The longest difference between TSM and BRT was about 9 minutes and the shortest was 0.1 minutes. The time savings is very little between the TSM and BRT when you consider the economic and social harmful effects of the exclusive lanes.

Response: There are not projected to be economic and social harmful effects resulting from the exclusive BRT lanes. Time savings was only one measure used in comparing the Alternatives. The BRT Alternative performed better on most measures, and was therefore selected by the City Council as the Locally Preferred Alternative.

48. Page 4-18, 4.2.3 Traffic Operations at Intersections. SDEIS didn't specify how many private cars and commercial vehicles would be displaced by exclusive lanes of the BRT. It only stated that they would be displaced. The actual number of passenger and commercial vehicles that would be prevented from using the following streets between 5 AM to 7 PM weekdays are: Kapiolani Blvd. - 20,252 vehicles, Ala Moana Blvd. - 19,096 vehicles, Dillingham Blvd. - 15,227 vehicles, and King Street - 11,298 vehicles. Eliminating these vehicles from these Honolulu streets will have adverse financial and social impacts on residents and commercial firms. Some of these displaced vehicles will be forced to travel through adjacent neighborhood streets endangering the safety of residents. There will probably be a shift of traffic throughout the In-town area.

Response: Tables 4.4-3 and 4.4-6 in Chapter 4 of the FEIS contain screening analyses for the Dillingham Boulevard and Kapiolani Boulevard corridors, respectively. These tables summarize the shift in traffic among parallel streets within these corridors for the No Build, TSM, and Refined LPA Alternatives. The majority of any shift in traffic is forecasted to occur on parallel major roadways. The smaller side streets are discontinuous, making them inconvenient for corridor traffic to use as alternative routes.

49. Chapter 6 - Financial Analysis and Appendix E - BRT Cash Flow Analysis. The City claims that the BRT will not require any increases in taxes, but the City will have to increase its subsidy to the Public Transportation System from its general revenue. This might cause the City to cut its budget or raise taxes, if it has to balance the budget.

Response: Operations and maintenance (O&M) costs will be higher for a system that has more capacity and carries more passengers. If the fares are kept at 27 percent of operating costs, then the BRT O&M costs will be an average of \$16.1 million more than the No Build O&M costs, and \$10.9 million more than the TSM Alternative. The City has the financial capacity for this increase using existing sources of revenue.

50. The actual figures are cited from the City's Comprehensive Annual Financial Report for FYs 2000 and 2001.

The actual operating and maintenance (O&M) costs for FYs 2000 and 2001 were respectively: \$130.4 million and \$140.3 million. In the August 2000 DEIS, the estimate for FY 2001 O&M was \$122 million, a \$18 million or 15 percent difference between the actual and estimated figures. In addition, their estimate in the SDEIS for FY 2002 O&M costs is \$126.6 million which is almost \$14 million less than the actual FY 2001 O&M costs of \$140.3 million. But if you look at the actual O&M costs for FYs 1999 to 2001, you would find a \$10 million growth in the O&M costs each year. Thus the FY 2002 O&M costs might be \$150 million instead of \$126.6 million as estimated.

Mr. Charles H. Carole  
Page 11  
November 13, 2002

In the SDEIS. This represents a \$24 million difference instead of a \$14 million difference. Remember these are their early FYs estimates, what credibility or confidence can you have in their other projections to FY 2025?

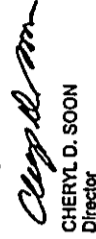
Response: As noted in the response to Question 34, the O&M costs cited for 2000 and 2001 include depreciation while the O&M shown in the DEIS, SDEIS, and the FEIS are O&M costs without depreciation. Depreciation pertains to asset value and not to O&M cost per se. In addition, the projections of O&M cost included in the various study phases are reviewed during each phase and compared to actual and budgeted O&M costs and revenues.

51. Since the general fund revenues provide 71 percent of O&M funding, O&M subsidies grows faster than the projected subsidies in the BRT cash flow analysis. The Public Transportation System required \$112 million O&M subsidies to balance the actual FY 2001 operating revenues and expenditures. The August 2000 DEIS estimate for FY 2001 O&M was \$78 million. The difference between the actual and estimated O&M subsidies was 43.5 percent. Again we are dealing with a first year estimate that is so far off the mark. In the SDEIS, they project the annual O&M subsidies for FYs 2002 to 2025 to run from \$81 million to \$277 million. Since their estimate for FY 2001 O&M subsidies was off by 43.5 percent, I can see the BRT causing an increase in taxes.

Response: The FY 2001 Department of Budget and Finance Report cited figure of \$112 includes depreciation on the bus fleet. Depreciation is not an actual Operating and Maintenance Cost, and is therefore not shown in the transit subsidy in the SDEIS or FEIS.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 521-6976. We appreciate your interest in the project.

Sincerely,

  
CHERYL D. SOON  
Director

HELEN T. CARROLL (R)  
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808/944-1718

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October 5, 2000

Ms. Cheryl Soon, Director  
Dept of Transportation Services  
711 Kapiolani Blvd. Suite 1200  
Honolulu HI 96813

Subject: Testimony - City Council Hearing  
on Primary Corridor Transportation Project

Dear Ms. Soon:

This is to provide you with my concerns and recommendations in regard to the subject matter, which I will also express tonight at the City Council Hearing. My concerns are generated based on the information provided at the Community Briefing Meeting held on October 2, 2000.

To introduce myself, I am a licensed Realtor, and I am the President of the Board of Directors of The Kalia, Inc., a 304 unit residential cooperative located on Ena Road.

1. The disclosure made at the Briefing Meeting in regard to the proposed system is shocking. It was stated that the system selected has only been implemented in one city in the world, located in Italy, and that system is still in a testing phase during the nighttime hours. In other words, Honolulu is the guinea pig. This is totally irresponsible on the part of the City Council.

2. Ala Moana and Kapiolani Routes  
Installing the system with two dedicated lanes on both Ala Moana and Kapiolani Blvd. is unnecessary and will create a traffic nightmare. It is a five minute walk between these routes.

This is an area that will soon be impacted with construction of a large retail facility, which will be accessed primarily by motor vehicles, not transit riders.

The route on Kapiolani Blvd will eliminate street parking, affecting existing businesses.

Visitors attending the convention center will be able to walk along the nicely improved walkway beside the Ala Wai Canal from Ala Moana Blvd. or walk along Atkinson Drive.

If such a system is installed, the Kapiolani Blvd route should be moved with the Kokohead route on King Street and Ewa bound route on Beretania. This allows the system to be available to increased ridership.

Ms. Cheryl Soon, Director  
Dept of Transportation Services  
October 5, 2000  
Page 2

3. Kalakaua and Kuhio Routes  
Routes thru walkiki should include utilization of the dedicated lanes for the transit with the existing bus service, with one dedicated lane on Kalakaua, and one on Kuhio. Do not eliminate a lane of traffic on Kuhio for the transit in addition to accommodating east and west bound bus service. Recognize that we are not giving up our vehicles. Do whatever possible to accommodate vehicular traffic as well.

4. Testing of Final Route Determination  
Prior to making commitments for a specific transit system, the dedicated lane system should be implemented with the existing bus fleet. It is absolutely insane to make a commitment such as the proposed system, without insuring that it is truly functional, solves the problem being addressed. Implementation of a system test will allow obvious adjustments to be made, and tested, rather than spending millions of dollars and finding a nightmare has been created.

5. Government Employees  
Mayor Harris has made it clear he is a strong proponent of the proposed transit system, and has a strong desire to dramatically reduce vehicular traffic. This should begin with the requirement that government employees should be required to take public transportation to work. Perhaps some incentive could be determined to encourage this. We might find it may eliminate the need for implementing this costly transit system. This is the very first item that should be addressed.

6. Illogical Traffic Patterns  
The planned traffic flow thruout Honolulu is illogical. The City needs to reevaluate the traffic patterns to move traffic more efficiently. Well planned left and U turns allow traffic to move to the destination, removing them from the traffic pattern at a faster pace. Multiple one-way streets going in the same direction also adds to the traffic congestion we experience. Logically reevaluate the system in place.

In closing, I strongly oppose the proposed transit system without first addressing the Government Employee issue stated, and if a system is still determined to be required, each of the above recommendations are a must.

Sincerely,

*Helen T. Carroll*  
Helen T. Carroll (R)

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**

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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE TEDIO - MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00542

November 13, 2002

Ms. Helen T. Carroll  
425 Ena Road, #1007-B  
Honolulu, Hawaii 96815

Dear Ms. Carroll:

Subject: Primary Corridor Transportation Project

This is a combined response to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your October 5, 2000 letter and your October 5, 2000 oral testimony at the Special Transportation Committee meeting regarding the MIS/DEIS. Part B responds to your oral testimony at the April 20, 2002 SDEIS public hearing.

Part A - MIS/DEIS Comments

1. *The disclosure made at the Briefing Meeting in regard to the proposed system is shocking. It was stated that the system selected has only been implemented in one city in the world, located in Italy, and that system is still in a testing phase during the nighttime hours. In other words, Honolulu is the guinea pig. This is totally irresponsible on the part of the City Council.*

**Response:** No specific traction power technology has been selected yet for the long-term. What has been decided is that the type of buses to be used for the BRT need to be environmentally friendly, meaning quieter and less polluting than diesel buses. One of the technologies being considered is embedded plate technology (EPT), which consists of electric vehicles that receive their power through a wayside contact system located in power strips embedded into the street. The other vehicle motive technology under consideration is hybrid-electric. There are several manufacturers developing their own versions of the embedded plate technology. One of them, AnsaldoBreda has a demonstration installation in Trieste, Italy. Since none of the EPT are available today for 60-foot, low-floor articulated buses, the plan for implementing traction power technology is to install an initial service proven technology (hybrid-electric buses) and decide whether to replace it using EPT in 2008.

2. *Installing the system with two dedicated lanes on both Ala Moana and Kapiolani Blvd. is unnecessary and will create a traffic nightmare. It is a five minute walk between these routes. This is an area that will soon be impacted with construction of a large retail facility, which will be accessed primarily by motor vehicle, not transit riders.*

**Response:** The In-Town BRT branches on Ala Moana and Kapiolani Boulevard will serve different destinations and corridors. The branch on Ala Moana Boulevard will serve Waikiki and the Ala Moana/Kakaako corridor. The branch on Kapiolani Boulevard will serve U.H.-Manoa and

Ms. Helen T. Carroll  
Page 2  
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the King/Kapiolani corridor. The relatively close proximity of the two BRT branches at Ala Moana Center allows passengers to transfer between the two branches. As evidenced by the large transit terminal at Ala Moana Center, there is significant use of transit to access retail uses.

3. *The route on Kapiolani Blvd. will eliminate street parking, affecting existing businesses.*

**Response:** As stated in Chapter 4 of the MIS/DEIS, implementation of the Refined LPA on Kapiolani Boulevard will displace about 48 unmarked spaces on the mall side of Kapiolani Boulevard between McCully Street and University Avenue plus roughly 166 affected spaces on Kapiolani Boulevard occur along the stretch between Pensacola and McCully Streets.

4. *Visitors attending the convention center will be able to walk along the nicely improved walkway beside the Ala Wai Canal from Ala Moana Blvd. or walk along Alderson Drive.*

**Response:** Comment noted. The project agrees with this statement.

5. *If such a system is installed, the Kapiolani Blvd. route should be moved with the Kokohead route on King Street and Ewa-bound route on Beretania. This allows the system to be available to increased ridership.*

**Response:** A significant segment of the U.H.-Manoa BRT branch runs on South King Street between Richards Street and Pensacola Street. It was decided to run the Ewa-bound direction of the BRT in an exclusive contra-flow lane on South King Street to keep Koko Head and Ewa directions of the route along the same street, simplifying usage for transit riders.

Localizing the entire U.H.-Manoa BRT branch on the King/Beretania route was explored in the early phases of the Primary Corridor Transportation Project. The amount of access along King and Beretania, on-street parking, and the desire to serve activity nodes such as Ala Moana Center and the Hawaii Convention Center argued for transitioning the route to Kapiolani Boulevard. Using Kapiolani Boulevard in the vicinity of Ala Moana Center also makes it possible for riders to connect with the Waikiki In-Town BRT branch and with the major transit transfer hub at Ala Moana Center.

6. *Routes through Waikiki should include utilization of the dedicated lanes for the transit with the existing bus service, with one dedicated lane on Kalaikaua, and one on Kuhio. Do not eliminate a lane of traffic on Kuhio for the transit in addition to accommodating east and west-bound bus services. Recognize that we are not giving up our vehicles. Do whatever is possible to accommodate vehicular traffic as well.*

**Response:** The Kalaikaua/Kuhio loop maintains auto access as well as passenger and freight loading zones on both Kalaikaua and Kuhio Avenues.

Sidewalks on Kuhio Avenue are planned to be widened independent of the primary corridor project as part of the Livable Waikiki Initiative. The lane designation on Kuhio Avenue with the Refined LPA will maintain one mixed traffic lane in each direction, plus an Ewa bound semi-exclusive BRT lane and a turning lane. In some areas, the laneage is one mixed traffic lane adjacent to the curb in each direction and Diamond Head-bound BRT lane.

7. *Prior to making commitments for a specific transit system, the dedicated lane system should be implemented with the existing bus fleet. It is absolutely insane to make a commitment such as the*

proposed system, without insuring that it is truly functional, solves the problem being addressed. Implementation of a system test will allow obvious adjustments to be made, and tested, rather than spending millions of dollars and finding a nightmare has been created.

**Response:** The proposed BRT system is based on ridership experience of the City's existing bus services, including the recently implemented express bus services that use much of the proposed BRT alignment, forecasts of BRT and local bus ridership using regional travel forecasting models, and input received at hundreds of public outreach meetings. A test without all features of the BRT system in place (i.e., limited stop operations in exclusive and semi-exclusive lanes using low-floor vehicles with level boarding through multiple doors) would be misleading and not a true test of the system. For example, the project proposes to completely reconstruct Dillingham Boulevard through the Kaimali area to provide significant pedestrian amenities to facilitate access to BRT stations, as well as building new BRT stations and exclusive lanes in the center of the roadway. Without such major reconstruction, it would not be possible to provide the substantial time savings for transit riders through this corridor that would be offered by the BRT. Most importantly, potential new riders would not likely perceive the demonstration service as permanent and would not be induced to change their travel mode.

8. Mayor Harris has made it clear he is a strong proponent of the proposed transit system, and has a strong desire to dramatically reduce vehicular traffic. This should begin with the requirement that government employees should be required to take public transportation to work. Perhaps some incentive could be determined to encourage this. We might find it may eliminate the need for implementing this costly transit system. This is the very first item that should be addressed.

**Response:** While elected officials can encourage government employees (along with all employees) to use public transportation, they can't force them to do so. The proposed approach is instead to provide an alternative to the private auto, namely BRT, that attracts people to it because it is faster and more reliable than the existing bus system would be able to be in the future as population grows and roadways become more congested. The City does provide an incentive to city employees by allowing them to do a pre-tax payroll deduction for purchase of monthly transit passes. They also provide bus passes for use by employees during the day when traveling on city business. The city runs education programs for new employees about these transit incentives as part of their orientation program. The State of Hawaii has similar incentives for state employees.

9. The planned traffic flow throughout Honolulu is illogical. The City needs to reevaluate the traffic patterns to move traffic more efficiently. Well planned left and U turns allow traffic to move to the destination, removing them from the traffic pattern at a faster pace. Multiple one-way streets going in the same direction also adds to the traffic congestion we experience. Logically reevaluate the system in place.

**Response:** DTS continually re-evaluates the level of service provided by existing roadways and continually makes modifications to City streets to provide improved level of service for its users.

10. In closing, I strongly oppose the proposed transit system without first addressing the Government Employee issue stated, and if a system is still determined to be required, each of the above recommendations are a must.

**Response:** See response to comment #8.

11. The first thing I'd like to mention is that at the meeting on October 2, there's been a disclosure about the proposed system and the fact that it's only been implemented in one city and that was in Italy and right now it's in the testing stage. So, I would hope that it's a long time before we make a decision on selecting that as the proposed system.

**Response:** See response to comment #1.

12. Now I'd like to address some of the routes that are proposed on Ala Moana and Kapiolani which is also being discussed by others. I think Kapiolani is really a mistake. We're looking at building a really big retail store on Keeaumoku. We're going to have a lot of vehicle traffic. That type of business is not going to attract bus riders. It's going to attract people with cars. So, if you have transit on both Ala Moana and Kapiolani, I mean, you've just knocked out all of the traffic. It's going to be a traffic nightmare.

**Response:** Traffic growth throughout the urban core of Honolulu is a major concern and the reason why the BRT is being explored as a way to increase the capacity and efficiency of the transit system. An enhanced transit system would attract more transit riders, helping the transportation system to achieve a better balance between different modes of travel.

13. The route on Kapiolani will also eliminate street parking. This is going to have an impact on businesses.

**Response:** With the implementation of the BRT Alternative, Ward Avenue between South King Street and Kapiolani Boulevard would lose roughly 48 parking spaces. Of the 48 affected spaces, about 17 are unrestricted parking spaces that are currently available during both peak and off-peak hours and 32 are restricted parking spaces that currently available during off-peak hours.

It is expected that the BRT Alternative will provide an attractive, affordable, dependable transportation option to the private automobile resulting in over 20,000 people per day diverting out of their cars to use transit. Some of these former auto drivers will be able to give up their cars or park their cars in outlying park-and-ride facilities. Therefore, parking demand in the BRT Alternative is expected to decline.

14. Then, as far as visitors attending the Convention Center, they don't need to have transit both on Kapiolani and Ala Moana. They can do that wonderful walkway along the Ala Moana. You made that a really nice pleasant walk. Or else they can go up Atkinson. So, you don't need transportation along Kapiolani.

**Response:** Some visitors will indeed utilize the Waikiki Branch to access the Convention Center. Others would utilize the U.H.-Manoa Branch, depending on their point of origin. These two branches work together to provide convenient access for the greatest number of people.

15. Finally, I was really happy to hear that you're going to have a test of this with the existing bus state. Because this way we'll know whether it's going to work or not before we spend millions of dollars and find out we have a nightmare. So that you can make modifications and all of that.

**Response:** No test of the BRT Alternative has been proposed. The proposed BRT system is based on ridership experience of the City's existing bus services, including the recently implemented express bus services that use much of the proposed BRT alignment, forecasts of BRT and local bus ridership using regional travel forecasting models, and input received at

hundreds of public outreach meetings. A test without all features of the BRT system in place (i.e., limited stop operations in exclusive and semi-exclusive lanes using low-floor vehicles with level boarding through multiple doors) would be misleading and not a true test of the system. For example, the project proposes to completely reconstruct Dillingham Boulevard through the Kalia area to provide significant pedestrian amenities to facilitate access to BRT stations, as well as building new BRT stations and exclusive lanes in the center of the roadway. Without such major reconstruction, it would not be possible to provide the substantial time savings for transit riders through this corridor that would be offered by the BRT. Most importantly, potential new riders would not likely perceive the demonstration service as permanent and would not be induced to change their travel mode.

16. Finally, Mayor Harris has made it very clear that he's very supportive of a transit system. He wants to eliminate cars. Well, I think the first step that all of you can make is that government employees should be required to take public transportation. We may not even have a need for transit at that point. Additional transit. Because we'll eliminate a lot of traffic.

Response: See response to comment #8.

17. And then finally, there's a lot of illogical traffic patterns and I think that needs to be visited. There's things to be against left-turns and u-turns in this city and if that's looked at you can eliminate cars being on the road so long. Also the one-way streets have to be looked at again. So, until those things are looked at, I oppose it.

Response: These are not issues being addressed by the PCTP.

#### Part B - SDEIS Comments

18. The purpose of this communication is to state my position in regard to the BRT project. I am in opposition to the In-Town BRT project.

Response: Thank you for taking the time to attend the public hearing and express your opinion regarding the project.

19. I have attended the majority of the meetings held in regard to this project, and find that my position of opposition has increased.

Response: No response required. It is a statement of preference.

20. If current plan makes it quite clear the intent is to remove Honolulu, and more specifically Waikiki residents ability to drive their vehicles in Waikiki, and also in the Dillingham area. A number of years ago, the City and County proposed the elimination of vehicular traffic in Waikiki, and to convert the area into a pedestrian mall. With the proposed plans, it is obvious once implemented, the next step the Dept of Transportation will be is to determine the removal of the vehicular lanes on Kuhio and Keolu is absolutely necessary due to the gridlock. Politics as usual!

Response: Comment noted.

21. As a resident of Waikiki, and a business person who must rely on my car to conduct my business, I strongly object. I must have vehicular access to my residence, and as a Realtor, to the many properties I serve. All residents are entitled to this right.

Response: The proposed BRT project will not affect access to your residence or the properties you serve.

22. Another concern that has not even been discussed, is the impact of this high-speed, frequent system on the safety of pedestrian. With our aging residents, and tourists this is an issue that must be addressed.

Response: Safety of pedestrians has been addressed in Chapter 4 of the FEIS.

23. The implementation of the in-town BRT will be a total nightmare to all residents and businesses in the area.

Response: Construction can result in disruptions to businesses, but the intent is to work with the local businesses and communities to keep them apprised of construction activities.

24. At the very first meeting held in regard to BRT, I recommended the implementation of a test of the system. This would be performed by the enforcement of utilization of the traffic lanes as being proposed to determine the true impact, and again gain public comment. This would eliminate spending millions of dollars, and disrupting all our lives with the endless construction prior to finding this is yet another "Traffic camera gone wrong".

Response: A test of some of the BRT features are already underway with implementation of the CityExpress and CountyExpress Routes. These new routes have been operating with limited stop service for the past several years and have drawn new riders to the bus system. The next step in testing the BRT concept will be implementation of the In-Town BRT branch. This will demonstrate the effects of using priority lanes with advanced design buses to attract additional riders.

25. It is time for our elected officials, and those paid by the public to serve the public to stop, listen, and make decisions to our benefit.

Response: No response required.

26. I'm here to state my opposition to the In-Town BRT project. I've attended the majority of the meetings held in regards to this project and find now that my position is even stronger.

Response: Thank you for attending the public hearing and expressing your views regarding the project.

27. The current plan makes it quite clear the intent is to remove Honolulu and, more specifically, Waikiki residents' ability to drive and park their vehicles in Waikiki and also in the Dillingham area.

Response: As presented in Chapter 4, the impacts of the Refined LPA will be to improve traffic conditions overall, including for motorists in Waikiki and Kalia.



DEPARTMENT OF TRANSPORTATION SERVICES  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE YEKONGI MUYAMOTO  
DEPUTY DIRECTOR

TPD02-00543

November 13, 2002

Mr. Keith Chan  
45-069 Lilipuna Road  
Kaneohe, Hawaii 96744

Dear Mr. Chan:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the November 14, 2000 Special Transportation Committee Meeting regarding your support of the In-Town BRT as the Locally Preferred Alternative (LPA).

We appreciate your support and interest in the project.

Sincerely,

CHERYL D. SOON  
Director

Ms. Helen T. Carroll  
Page 7  
November 13, 2002

28. A number of years ago, the City and County proposed the elimination of vehicular traffic in Waikiki and to convert the area into a pedestrian mall. With the proposed transit, it is obvious, once implemented, the next step for the Department of Transportation will be to determine the removal of all vehicular lanes on Kūho and Kaleiāua is absolutely necessary due to the gridlock. Waikiki than will have to become a pedestrian experience. It's politics as usual.

Response: The City has not proposed the elimination of vehicular traffic in Waikiki. A "pedestrian first" policy for Waikiki is recognized by the Waikiki community and it includes many pedestrian enhancements, but the elimination of all vehicular traffic is not being proposed.

29. Personally, as a resident of Waikiki and as a business person who must rely on my car to conduct business, I strongly object. I must have my car to access my residence and, as a realtor, to the many properties I serve. All residents are entitled to this right.

Response: The proposed BRT project will not affect access to your residence or the properties you serve.

30. Another concern that has not even been discussed is the impact of this high speed frequent system on the safety of the pedestrians. With our aging residents and tourists, this is an issue that must be addressed.

Response: See response to comment # 22.

31. The implementation of the In-Town BRT will be a total nightmare to all residents and businesses in the area, as has been expressed by a lot of people.

Response: See response to comment # 23.

32. At the very first meeting held in regard to BRT, and in subsequent meetings, I recommended the implementation of a test of this system. This would be performed with the enforcement of utilization of the traffic lanes, as being proposed, to determine the true impact and, again, gain public comment. This would eliminate spending millions of dollars and disrupting all of our lives with the endless construction prior to find this is yet another traffic camera gone wrong.

Response: See response to comment # 24.

33. Another recommendation that I made in prior meetings is to require the government employees to take public transportation. This would reduce traffic significantly, and also, it would allow the public to utilize the parking spaces in the city and county facilities for our use when we're there on business.

Response: See response to comment # 24.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Mhyamoto at 527-6978. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE KEOKI MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD02-00544

Mr. Jimmy Chong  
2552 Kalia Street #A  
Honolulu, Hawaii 96819

Dear Mr. Chong:

Subject: Primary Corridor Transportation Project

This is in response to your testimony at the October 26, 2000 Transportation Committee Meeting regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

*"I'm here this evening to testify in support of the Bus transit as planned by the City and County Department of Transportation Services. The bus transit alternative will improve public transportation for residents of Oahu. The bus rapid transit proposal will finally do something significant about our traffic congestion."*

**Response:** Your oral testimony at the November 14, 2000 Special Transportation Committee Meeting supported the In-Town BRT as the Locally Preferred Alternative (LPA).

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE KEOKI MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD02-00545

Mr. Dave Chun  
3180 Ala Ilima Street, Apt. B  
Honolulu, Hawaii 96818

Dear Mr. Chun:

Subject: Primary Corridor Transportation Project

This is in response to your testimony at the October 5, 2000 Special Transportation Committee Meeting regarding the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. *But here are a couple of observations that I'm still trying to research some issues on and that's, for example, how's the transportation gonna be, how does it relate to planning and zoning, density, the primary urban center development plan?*

**Response:** The Refined LPA is intended to support land use objectives of the Public Review Draft of the Primary Urban Center Development Plan (June 1999), which promotes the concept of "urban villages", a mix of residential, employment and commercial land uses.

2. *Next observation is the transportation route. If we do go on a fixed rail or a BRT system, does it really make sense to have an up and down... Let's use University Avenue, for example. Does it make sense to have an up and down system or why not just have one system with a little oval loop at a transit stop where buses can pass each other. That will save some space.*

**Response:** It is not clear from the comment what specifically is being proposed, but if it is to have a single lane with buses operating in both directions and a place to pass at stations, this would not work due to the high volume of buses that would be using the lane. The potential for accidents (head-on collisions) and significant operational delays would be too great.

3. *The third thing in regards to McCully/Moaii, it really comes down to some route. Whether it's University, Isenberg, McCully. But I do want to point out that businesses exist on King Street. And I think if we're gonna support small business... And I did some research on the land ownership along King Street. Many of the lands are owned by small persons. Okay. Not your big corporations. I think by having a fixed rail route along King Street it will assist in equalizing the social-economic playing field for economic advancements.*

**Response:** The In-Town BRT UH branch does travel on S. King Street from Downtown to Pensacola Street. It then transitions to Kapiolani Boulevard so that it can serve Ala Moana Center and the Convention Center. Kapiolani Boulevard along this stretch also presents greater opportunities to help shape land development than does King Street since there are a number of large undeveloped or under-utilized parcels.

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Mr. Dave Chun  
Page 2  
November 13, 2002

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6876. We appreciate your interest in the project.

Dave Kaulike Chun  
431 West Braddock Road, Alexandria, Virginia 22311  
624 University Avenue, Honolulu, Hawaii 96826  
Phone: 703-566-2165 Email: [dave@hawaii.gov](mailto:dave@hawaii.gov)

Sincerely,



CHERYL D. SOON  
Director

May 7, 2002

Federal Transit Administration, Region IX  
U.S. Department of Transportation  
201 Mission Street, Suite 2210  
San Francisco, California 94105-1839  
Attention: Mr. Ray Sukys and Ms. Donna Turchie

Federal Highways Administration  
Prince Jonas Kuhio Kalamansole Federal Building  
300 Ala Moana Boulevard  
Honolulu, Hawaii 96813  
Attention: Mr. Abraham Wong and Mr. Bruce Turner

Hawaii Office of Environmental Quality Control  
State Office Tower, Suite 702  
235 South Beretania Street  
Honolulu, Hawaii 96813  
Attention: Ms. Genevieve Salmonson, Director

Department of Transportation Services  
City and County of Honolulu  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813  
Attention: Ms. Cheryl Soon, Director

Subject: Primary Corridor Transportation Project Bus Rapid Transit  
(BRT) Supplemental Draft Environmental Impact Statement

Dear Ms. Turchie, Mr. Wong, Ms. Salmonson, and Ms. Soon:

Thank you for the opportunity to submit comments regarding the proposed Bus Rapid Transit Supplemental Draft Environmental Impact Statement. For your review, attached is a resolution regarding the proposed Bus Rapid Transit Plan adopted by the McCully-Mo'ili'ili Neighborhood Board in November 2000.

At the outset, as neighborhood leaders who have been involved for over a decade in issues relating to transportation, planning, and zoning, we believe that the viewpoints set forth in our testimony is a balanced reflection of the sentiment of the McCully-Mo'ili'i community.

It is now over two years since the McCully-Mo'ili'i Neighborhood Board adopted its resolution on the proposed BRT Plan, and we continue to express our strongest concerns regarding the proposed BRT Plan. The DEIS and SDEIS has not addressed the comments, concerns, and questions contained in the Board's resolution.

- Community involvement: Since the first BRT Plan meeting, the majority of McCully-Mo'ili'i residents opposed the proposed BRT route on Kapi'olani Boulevard and University Avenue. The assertion that the community consensus was adhered to in making decisions on the BRT Plan is stretched very thin at its best.
- Development and Growth: The BRT Plan does not fully address growth impact issues (eg. Property tax impacts on small landowners and affordable housing) and provisions in the proposed Primary Urban Center Development Plan.
- Financing of BRT Plan: Financial data is not provided for the total cost of the project (capital costs, operations subsidies, and debt service). The City states that federal funding will be 65% of the project. Yet according to the FTA, large projects in terms of dollar amount such as the proposed BRT Plan, would in all likelihood qualify for only a 50% match.
- The BRT Plan does not address the total dollar amount each City taxpayer will pay for the non-federal cost of the project. The City should at the minimum disclose the true costs (operations, debt service, inflation etc.) of the project through 2025. Why has the State decided not to participate with the City in financing the BRT project? Can the City finance the BRT project without raising property taxes or creating a special transportation tax borne by all O'ahu taxpayers?
- Electrical and sewage: There is no definitive data on the financial costs associated with installation, maintenance, and repairs of public utilities.
- Traffic tests: There has been no "live" traffic testing to conclusively determine total traffic impacts on the proposed in-town segment of the BRT. The SDEIS does not address traffic overflow into neighborhood streets such as those in and around Lunalilo Elementary School or in the Sheridan block. What are the cumulative traffic impacts on the stable neighborhoods from Kapahulu to Sheridan? Does the City have plans to mitigate these traffic impacts in neighborhoods abutting the BRT corridors? Why has the City Administration not undertaken a pilot traffic project to tests for traffic impacts caused by lane closures?
- Historic sites, landscapes, and view planes: No information is provided on direct and indirect impacts of the BRT Plan on these issues, so essential to maintaining a "Hawaiian Sense of Place."

In summary, we question whether the current bus transportation system has been provided with the necessary financial support to demonstrate maximum efficiency. Further, we ask why a BRT Plan is being proposed in the absence of a Honolulu traffic management plan.

We believe that the BRT Plan has not satisfied all the conditions that must be considered for funding under the New Starts planning and project development process. We believe that the Major Investment Study falls short of compliance with the New Start rules by not adequately evaluating all reasonable modal and multimodal alternatives and general alignment options for addressing the identified transportation needs of Honolulu.

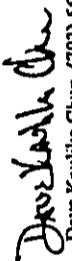
We believe that the locally preferred alternative route is not supported by the community as professed by the City Administration. How can the City proclaim such support for the BRT Plan when even the State has decided against participating in the financing of the project?

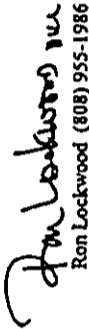
We believe that there is a serious need to examine the stability and reliability of the capital financing and operating plan.

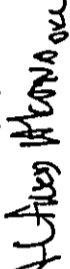
We believe that the City Administration has failed to definitively demonstrate that the BRT Plan fulfills technical and financial capacity as required for FTA approval into final design.

We believe that the proposed BRT project should be deferred until the "true" financial costs of the system is made known to the taxpayer.

Very truly yours,

  
Dave Kaulike Chum (703) 566-2165

  
Ron Lockwood (808) 955-1986

  
Alfred Akana (808) 942-9824

cc: Oahu Metropolitan Planning Organization  
Honolulu City Council  
State Legislature

**POSITION OF THE  
McCULLY-MO'ILII NEIGHBORHOOD BOARD NO.8  
ON THE  
BUS RAPID TRANSPORTATION PLAN**

November 2, 2000

The McCully-Mo'ili'i Neighborhood Board No. 8 submits the following comments regarding the proposed Transportation Plan to the City Council of Honolulu and City Administration.

1. The proposed dedicated fixed tram routes through McCully-Mo'ili'i as communicated by the City Administration via the Department of Transportation Services as the preferred route voiced by McCully-Mo'ili'i residents during the Trans 2K community meetings were never supported by participants from our neighborhood. We do not understand the basis for this statement by the City Administration via the Department of Transportation Services.
2. The Major Investment Study Draft Environmental Impact Statement MIS/DEIS is deficient in its economic analysis on alternative modes of transportation and its impact on private transportation systems. The Board takes a cautious approach in supporting a transportation monopoly.
3. We question the logic and arguments presented for an in-town fixed rapid transit system supported by a hub and spoke bus system to a redesigned Middle Street terminus. We suggest that a rapid transit system from the outlying country areas to a Middle Street terminus that would connect riders to bus expresses into the urban core should be open to further exploration and discussion.
4. Due to conflicting statistical information, we question the immediate necessity to make a decision on establishing a dedicated fixed route system.
5. We question whether the City has maximized the potential of the current bus system. We are pleased that the City is investigating alternative forms of energy for the BRT; likewise we suggest that buses in the future could be powered by photo-voltaic fuel cells.
6. We believe the MIS/DEIS does not adequately address 21st Century communication systems and its impact on a work force traditionally reliant on transportation to and from an established work center.

7. The City states that the transportation system will dictate future development for the PUC. We believe the MIS/DEIS does not adequately address social and environmental impacts related to development and growth. We believe transportation, planning, zoning and water resource allocation are inseparable in planning urban growth; and thus believe that an EIS should be prepared with these four components as a sum of the total rather than as individual denominations. We believe segmenting these four components, while perhaps legal under the law, is ultimately detrimental in determining our vision for the future; and ensuring the quality of life we desire for our community of McCully-Mo'ili'i.
8. We believe that transportation should be developed to help level the economic playing field for small landowners and businesses. We do not believe the Honolulu transportation system should subsidize large investors and landowners at the expense of Hawaii's taxpayer.
9. We recommend that a study be undertaken by an independent company for the proposed BRT and the MIS/DEIS.
10. We recommend the development of an urban Honolulu traffic management plan before proceeding with a fixed rail transportation system.
11. We note that the general public has been given very little time to fully study and comprehend the enormity of the proposal; especially in its impact to development as proposed in the City's Draft Primary Urban Center Development Plan.
12. There are too many unanswered questions for the Board to take the next step in supporting a billion dollar BRT transportation venture. We recommend that an independent study be conducted regarding the proposed BRT financial plan as submitted by the City.
13. The McCully-Mo'ili'i Neighborhood Board support further studies to analyze financial, social and environmental impacts for fixed rail transportation systems.
14. We are able to support the Transportation System Management Alternative number 2.

John Kato, Chairperson  
McCully-Mo'ili'i Neighborhood Board No. 8.

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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CHERYL D. SOOH  
DIRECTOR  
GEORGE WICKI  
DEPUTY DIRECTOR

TPD502-01841R

November 13, 2002

Mr. Chun, Mr. Lockwood, and Mr. Akana  
Page 2  
November 13, 2002

JEREMY HARRIS  
MAYOR

Mr. David K. Chun  
Mr. Ron Lockwood  
Mr. Alfred Akana  
624 University Avenue  
Honolulu, Hawaii 96826

Dear Mr. Chun, Mr. Lockwood, and Mr. Akana:

Subject: Primary Corridor Transportation Project

This is in response to your May 7, 2002 letter regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. At the outset, as neighborhood leaders who have been involved for over a decade in issues relating to transportation, planning, and zoning, we believe that the viewpoints set forth in our testimony is a balanced reflection of the sentiment of the McCully - Moiliili community.

Response: We appreciate the McCully-Moiliili Neighborhood Board's interest in the project and other transportation issues affecting their area.

2. It is now over two years since the McCully - Moiliili Neighborhood Board adopted its resolution on the proposed BRT Plan, and we continue to express our strongest concerns regarding the proposed BRT Plan. The DEIS and SDEIS have not addressed the comments, concerns and questions contained in the Board's resolution.

Response: Your comments on the MIS/DEIS and SDEIS have been addressed in the FEIS. In particular, concerns regarding land use and the development plan have been addressed in Chapter 5.

3. Community Involvement: Since the first BRT Plan meeting, the majority of McCully-Moiliili residents opposed the proposed BRT route on Kapolani Boulevard and University Avenue. The assertion that the community consensus was adhered to in making decisions on the BRT Plan is stretched very thin at its best.

Response: Comment noted. It is a statement of opinion and hearsay.

4. Development and Growth: The BRT Plan does not fully address growth impact issues (e.g. Property tax impacts on small landowners and affordable housing) and provisions in the proposed Primary Urban Center Development Plan.

Response: The proposed BRT system is not meant to address non-transportation issues, such as property tax assessments and provision of affording housing. The purpose of BRT is to improve the mobility of people who choose not to use the private automobile.

5. Financing of BRT Plan: Financial data is not provided for the total cost of the project (capital costs, operations subsidies, and debt service). The City states that federal funding will be 65% of the project. Yet according to the FTA, large projects in terms of dollar amount such as the proposed BRT Plan, would in all likelihood qualify for only a 50% match.

Response: The financial plan presented in Chapter 6 shows that a combination of funding sources will be used. Federal sources of capital funding will be FTA formula and grant funds, and FHWA highway program funds. The federal portion of FTA New Starts funds can be as high as 80 percent, but are typically 50 percent shared with the local entity. The Refined LPA assumes a 50 percent federal share for these funds. FHWA funds are 90 percent federally funded for projects on the Interstate highway system and 80 percent for other eligible highways. Since some portions of the project will be funded with FTA funds and some with FHWA funds the average federal share is projected to be about 65 percent.

6. The BRT Plan does not address the total dollar amount each City taxpayer will pay for the non-federal cost of the project. The City should at the minimum disclose the true costs (operations, debt service, inflation etc.) of the project through 2025.

Response: The cost of the project through 2025 are spelled out in detail in Chapter 6 and in the cash flow tables in Appendix E of the DEIS, SDEIS, and FEIS.

7. Why has the State decided not to participate with the City in financing the BRT project?

Response: The State through their representatives at OHPD has approved the financing plan for the Regional and In-Town BRT. The financing plan contained in Chapter 6 of the FEIS reflects the agreement reached by the OHPD Policy Committee that City funds rather than State funds would be used for the local match to the FHWA funds that will be used to fund the project. This will enable the approximately \$40 million of State funds assumed in the MIS/DEIS to fund the BRT project to be used as the local match for State highway projects instead.

8. Can the City finance the BRT project without raising property taxes or creating a special transportation tax borne by all Oahu taxpayers?

Response: Yes. The project has been phased in such a way as to allow for the use of multiple sources of funding, and to minimize the load on local funding sources in any given year.

9. Electrical and sewage: There is no definitive data on the financial costs associated with installation, maintenance, and repairs of public utilities.

Response: The capital cost estimates that were utilized to complete the financial analysis in the FEIS included construction costs for new utility installations and existing utility modifications necessary for the BRT improvements.

10. Traffic tests: there has been no "five" traffic testing to conclusively determine total traffic impacts on the proposed in-town segment of the BRT.

Response: A test of some of the features of BRT are already underway with implementation of the CityExpress and CountryExpress Routes. These new routes have been operating with limited stop service for the past several years and have drawn new riders to the bus system. The

next step in testing the BRT concept will be implementation of the trial to Waikiki branch. This will demonstrate the effects of using priority lanes with advanced design buses to attract additional riders.

11. The SDEIS does not address traffic overflow into neighborhood streets such as those in and around Lunalilo Elementary School or in the Sheridan block.

Response: The UH-Manoa Branch of the BRT will operate in mixed traffic on Kapiolani Boulevard between Atkinson Drive and University Avenue. Lunalilo Elementary School is located between the major streets of Kalakaua Avenue and McCully Street. No Kapiolani Boulevard lanes are proposed to be converted from general purpose to transit lanes in this segment, and the existing peak period contra-flow operation will be maintained. The proposed configuration is projected to have little difference on traffic patterns in this area compared to the No-Build or TSM Alternatives.

With the Refined LPA, one lane in each direction on Kapiolani Boulevard will be converted for exclusive BRT use between Pensacola Street and Atkinson Drive. This reallocation will result in slightly more delay for motorists at intersections along this segment of Kapiolani Boulevard. At the same time, delay to BRT vehicles is projected to be significantly less than vehicles in the general-purpose lanes, resulting in increased transit ridership and increased person throughput along Kapiolani Boulevard. Any diversion of traffic is expected to shift to the King-Beretania corridor. The east-west roadways within the Sheridan block do not continue west of Pensacola Street, making them inconvenient alternatives to Kapiolani Boulevard. Additionally, these east-west roadways will probably serve more of a circulation function given the future development of Wal-Mart and Sam's Club in the "Super Block" area.

12. What are the cumulative traffic impacts on the stable neighborhoods from Kapiolani to Sheridan?

Response: See response to comment #11.

13. Does the City have plans to mitigate these traffic impacts in neighborhoods abutting the BRT corridors?

Response: See response to comment #11.

14. Why has the City Administration not undertaken a pilot traffic project to tests for traffic impacts caused by lane closures?

Response: A test of closing a lane is not a test of what will happen with the BRT. It is only a test of what happens when a lane is closed which is something everyone knows the consequence of from when lanes are temporarily closed during utility construction.

As is pointed out in Chapter 4 of the FEIS, over time there will be enough people diverted from autos to transit to offset the impact of converting lanes for priority use by buses. This diversion from autos will only happen once it is clear that the BRT installation is a permanent improvement, not part of some test.

What is proposed with the first In-Town BRT branch between Hialeah and Waikiki will be a good test of the ability of BRT to attract new riders and the impacts of converting lanes in selected locations.

15. Historic sites, landscapes, and view planes: No information is provided on direct and indirect impacts of the BRT Plan on these issues, so essential to maintaining a "Hawaiian Sense of Place."

Response: The potential impacts to historic sites, and landscapes or view planes are discussed in Sections 5.10 and 5.4, respectively in the MISDEIS and the FEIS.

16. In summary, we question whether the current bus transportation system has been provided with the necessary financial support to demonstrate maximum efficiency.

Response: This is a comment on the present bus system not on the proposed project.

17. Further, we ask why a BRT Plan is being proposed in the absence of a Honolulu traffic management plan.

Response: The Year 2025 Transportation for Oahu Plan (TOP 2025) provides an overall framework for future transportation projects. The Oahu Metropolitan Planning Organization (OMPO) Policy Committee approved the TOP 2025 in April 2001. The In-Town BRT (Project no. P-2b) and the Regional BRT (Project no. P-2a) are both included in this plan.

18. We believe that the BRT Plan has not satisfied all the conditions that must be considered for funding under the new Starts planning and project development process. We believe that the Major Investment Study falls short of compliance with the New Start rules by not adequately evaluating all reasonable modal and multimodal alternatives and general alignment options for addressing the identified transportation needs for Honolulu.

Response: This is a statement of opinion. The FTA deemed that the MISDEIS adequately addressed all reasonable modal and multimodal alternatives when they reviewed it for release. Further the City Council deemed that it adequately addressed alternatives and that they were able to select a Locally Preferred Alternative.

19. We believe that the locally preferred alternative is not supported by the community as professed by the City Administration

Response: Comment noted.

20. How can the City proclaim such support for the BRT Plan when even the State has decided against participating in the financing of the project?

Response: See response to comment #7.

21. We believe that there is a serious need to examine the stability and reliability of the capital financing and operating plan.

Response: In the FEIS, additional refinements were made to strengthen the viability of the financial plan. Adjustments included refinements to phasing, questioning and adjustments to revenue sources, and the comparison of assumptions against industry and regulatory standards. In particular, the ability of the City to finance the local portion of the capital costs was tested against the City's Debt and Financial Policies as passed by the City Council in April, 2002.

Public Comment Form  
Primary Corridor Transportation Project  
Island of Oahu, Hawaii

Mr. Chun, Mr. Lockwood, and Mr. Akana  
Page 5  
November 13, 2002

The information you provide on this form will help the C & C of Honolulu and the Federal Transit Administration in the future planning of the Primary Corridor Transportation Project. We appreciate any comment you may have. Comments must be postmarked or received by November 6, 2000.

Name: Barbara J. Chung  
Representing: myself, a bus rider  
Address: P.O. Box 37863  
Honolulu, HI 96837  
Residence: Waipahu

Please make any comments below:

22. We believe that the City Administration has failed to definitively demonstrate that the BRT Plan fulfills technical and financial capacity as required for FTA approval into final design.

Response: Comment noted. It is a statement of opinion. The technical and financial analyses have been accomplished with the FTA.

23. We believe that the proposed BRT project should be deferred until the "true" financial costs of the system is made known to the taxpayer.

Response: The MIS/DEIS, SDEIS, and FEIS, Chapter 6 and Appendix E present the project's financial analysis and cash flow tables, respectively.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

I depend solely on the bus for transportation. I attended 3 Oahu Trans 2K meetings between 1998 and March 2000, and 2 other transportation meetings Oct 6, and Oct 12, 2000. During the 3 Oahu Trans 2K meetings in Waipahu and Kapolei we were almost exclusively presented with the Hub and Spoke system. We and Linda Frysztecki from Seattle worked on this project. The BRT and other two systems (HEIS & ?) promoted in the Oct 6, and Oct 12, meetings were hardly discussed. Hub and Spoke was the focus. In 2 of the 2K meetings participants supplied with maps, marked out desired bus routes. We weren't sure until the March 2000 meeting at August Arenas Elem. School when Hub and Spoke would be implemented. "C"Xpress would start May 2000 and A-Xpress would come to Waipahu in August 2000. I had no idea that the City and County were planning to start the BRT or other



two alternates at all and that Hub and Spoke was so temporary.

Regarding the T.V. news spots on NBC, ABC and Fox, stating that the BRT or bus only lanes project had already been approved in the 1998 through March 2000 Trans 2K meetings, I can state that I did not hear that, I was not aware of it and that the recent City and County Oahu Transit Dept. meeting and the City Council Public Hearing made the BRT and alternates presentation the only <sup>focus</sup> focus. Testimony was heard from a variety of people these ideas and the presentation. If the BRT had already been adopted why were you asking for testimony and why didn't you tell us in March that Hub and Spoke was so temporary and that BRT was the main goal. I know you have some of these meetings on video. You should have told us this in Oct. too, that BRT was already it.

According to Federal Law you can't make the decision without first presenting it to the public, explaining it and asking for testimony (which you did Oct 6, 12 and in several other meetings in October). I

don't think it is a 'done deal' but I think the City and County would like it to be because of the 63% Federal dollars that would come into the state. I think you are trying to rush the project through the approval stage without giving the bus-ineses affected by these changes a fair opportunity to comment and that you have falsely stated that it was already approved ~~but~~ between 1998 and 2000 Oahu Trans 2K meetings.

My observation is that the Hub and Spoke system can work well and has. What I haven't been able to understand is how it could deteriorate so badly after working so well then recover again so quickly. When I have commented on this to some bus drivers and asked them about it they say nothing is wrong and have accused me of being a trouble maker and chronic complainer. I disagree, I give praise where praise is due and I need a good dependable bus service - so that when things don't run reasonably smoothly (notice I didn't say perfectly) I ask questions. The Transit supervisors I have talked to have been more honest

and nicer.

Since the Oct 2000 meetings and my testimony about the A-Xpress, things have improved, very suddenly I might add. One day the A buses aren't on schedule and masses of people are at Waipahu stops waiting to get to Honolulu, the next day buses are on schedule and seen on the streets. I've kept an "A" bus journal since mid June 2000 and can give bus numbers, time, date, locations for various levels of service on request.

After the 2 transportation meetings in Oct 2000 on BRT and the 2 other alternatives I theorized that perhaps the Hub and Spoke System was set-up in part, not to work at times so that people would be dissatisfied and complain about it (as I have when it wasn't working) and ask for a new improved service → BRT. That might explain why it works (Hub and Spoke) in an on-again off-again way. I have used the old 47-51 bus service for several years and the Hub and Spoke system 4-7 days a week since it started. When you ride that often

you get to know the drivers, and how the system is working from many different angles.

When I saw some of the small business owners being interviewed on the 10-30-00 news casts worrying about how the 'bus only' lanes would affect their businesses in Kalihi - along Dillingham Blvd, I had to write and ask that you and the other City and County departments and agencies that are going to be making the decisions on the BRT program to try it out before deciding. Consult the merchants and allow them to voice their needs and concerns about how the new system will impact their customers access to shopping center entrances and parking. Many of these businesses are small, have loyal clientele and are located not only in Waikiki and Kaimuki but Kalihi as well. Don't approve this new system if it destroys the customer base of these older, well established and local businesses. Adapt the system to fit the small businesses along the way as well as the bus riders.

I have been on BRT type transport systems in L.A., S.F. and in Europe - Geneva, Frankfurt, Vienna etc. and I favor them. However in Europe they put the center bus only lanes on wide boulevards. Hawaii streets are narrow in comparison. If you widen our streets it would be so time consuming, disruptive to business and traffic and costly. If you don't widen them and put in a 2 bus only lane on a 4 lane street we might have constant traffic jams. If you start the project without testing it first you might have costly mid-project changes, long completion delays and a system that doesn't work. We need to find the appropriate transit system for Honolulu - sized to our streets.

One thought, the S.F. trolley cars (old fashioned, single cars that run on tracks to Fisherman's Wharf) travel in 2 lanes, 2 ways on wide streets e.g. near Union Square but use one lane on narrow streets. Autos turn left and right across tracks when safe. Trolley routes are designed

to serve passengers in a circular manner on narrow bus only lanes.

To sum up:

- ① Please Keep <sup>the</sup> service of a Hub and Spoke system working at a high level whatever future plans and/or changes you are planning for the future.
- ② Please consult with small, medium and large businesses on their needs and concerns should you choose another bus system before approving or implementing that system. Treat all economic levels of communities alike. Test the system first with coning as several people testifying in Oct 2000 requested.
- ③ Don't force or manipulate people into accepting a hidden agenda. It won't work in the long run.

Service at the Waipahu Transit Center has markedly improved since mid-October

with the 'A', 40 and 42 bus lines.  
Please keep this level of service  
up and improve it if possible. Adding  
the 81 line during the day has helped  
a lot too.

I favor the BRT if it can be  
adapted to Oahu and Honolulu streets  
so that autos can function on the  
same streets reasonably smoothly.  
I have a list of trouble spots  
and good working spots I can give  
you if you are interested.

Thank you for taking the time to  
read this long paper.

Sincerely,  
Barbara J. Chung

P.S. Another point that needs to be  
addressed is road work during  
the day at key intersections  
that causes long delays (not  
short delays).

I guess the main question I want  
to ask is: Is the Hub and Spoke  
not working in Waipahu in a con-  
sistent way because you want people  
to complain about it so that you  
can further the BRT system? If the  
answer is yes, don't hold our Waipahu  
Hub + Spoke system hostage to BRT.  
Let it work well as I have seen it  
and in a timely manner so that  
residents can depend on getting to  
town using the bus schedule. Give  
A-Express service every 20 min. the  
way you did when it began on 6-20-00.  
Now it is so uneven we never know  
when a bus is going to show up so  
that we can't chance it and have  
to budget say for e.g. a 1 1/2 hr  
trip - 3 hrs to ensure that we get  
to town on time. This is how I  
am budgeting travel time from Waipahu  
to downtown now ~~was~~ in spite of  
the A-Express and daytime 81. Two  
81 trips have ended in freeway  
breakdowns where passengers disembark  
on the freeway and are picked up

86 out of 8

by another bus - on the freeway.  
One express driver of the A spent  
40 minutes on the freeway from the  
Hickham entrance to the Middle St.  
off ramp while other A's and C's  
were passing us by. That trip took  
1 hour and 30 min from Leeku to Aala  
Park. How can I count on getting  
to a Dr's appointment if I don't  
allow 2-3 hours instead of 1 1/2  
hours if the system were working  
reasonably well.

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

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JEREMY HARRIS  
MAYOR



CERYL D. SOON  
DIRECTOR

GEORGE KECOKI MYAMOTO  
DEPUTY DIRECTOR

TPD11/00-05374R

November 13, 2002

Ms. Barbara J. Chung  
P.O. Box 37863  
Honolulu, Hawaii 96837

Dear Ms. Chung:

Subject: Primary Corridor Transportation Project

This responds to your comments on the Major Investment Study/Draft Environmental Impact Statement (MISDEIS). We are responding to your testimony at the October 5, 2000 Special Transportation Committee Meeting, your October 12, 2000 public hearing comment form, and your oral testimony at the October 12, 2000 public hearing regarding the MISDEIS:

1. *What I would like to see is the Transportation Department insert some of their employees into the Kaimali Transit Center to monitor the scheduling so that at least this thing is going to run more efficiently.*

**Response:** There will be supervisory personnel at the Middle Street (Kaimali) Transit Center to see to it that it runs smoothly and efficiently.

2. *Because I go to Wahiawa several times a month to do shopping, I would like to see a spoke bus go from Weipahu to Wahiawa through the back Kunihi road, maybe touching Miliani and then Village Park, Miliani, Wahiawa and then coming back.*

**Response:** This is not a PCTP comment. It has been referred to DTS bus planners.

3. *Then you'd be left with Waikale. It would be really convenient to get one bus from Waikale through downtown, maybe freeway to Makalapa Gate and then Peartidge. Like the old 48. Going to Waikale. So the Japanese tourists don't have to transfer buses.*

**Response:** This is not a PCTP comment. It has been referred to DTS bus planners.

4. *If the BRT had already been adopted why were you asking for testimony and why didn't you tell us in March that Hub and Spoke was so temporary and that BRT was the main goal.*

**Response:** At the time of the comment (Public Hearing on October 12, 2000) the BRT had not been adopted as the Locally Preferred Alternative. There seems to have been some confusion with the public meetings on the initial conversion to a hub-and-spoke system in Leeward Oahu, which is an immediate project, and the Primary Corridor Transportation Project, where the focus is on the longer term transit system.

5. According to Federal Law you can't make the decision without first presenting it to the public, explaining it and asking for testimony (which you did Oct 6, 12 and in several other meetings in October).

Response: Comment noted.

6. I think you are trying to rush the project through the approval stage without giving the businesses affected by these changes a fair opportunity to comment and that you have falsely stated that it was already approved between 1998 and 2000 Oahu Trans 2K meetings.

Response: The project's public involvement activities began in 1998 and continue today. Input from the public was critical in developing and evaluating alternative transportation solutions and no decision was made until the City Council selected the Locally Preferred Alternative on November 29, 2000.

In addition to four rounds of Oahu Trans 2K public workshops attended by a total of 1,250 individuals, meetings were held with more than 100 governmental agencies, elected officials, businesses, and business, community and civic organizations. The public also had the opportunity to provide input on the various alternatives at a series of four City Council Transportation Committee Meetings prior to selection of the LPA.

For the environmental review process, which is required under both State and federal regulations, the public has been given opportunities to comment on two occasions, the public review period of the MIS/DEIS, from September 8 to November 30, 2000, and the public review period for the SDEIS, from March 13 to May 7, 2002. Following the environmental review process, public involvement will continue in many areas, such as the planning, design and construction of transit centers, transit stops, streetscapes, landscaping, substation power supply station location and design, aesthetic design of vehicles, ITS, and particulars of the ticketing system.

7. My observation is that the Hub and Spoke system can work well and has. What I haven't been able to understand is how it could deteriorate so badly after working so well then recover again so quickly.

Response: It is not possible to respond to this comment since it is unclear when this lapse in the quality of service occurred and when it recovered.

8. After the two transportation meetings in Oct. 2000 on BRT and the two other alternatives I theorized that perhaps the Hub and Spoke system was set-up in part, not to work at times so that people would be dissatisfied and complain about it (as I have when it wasn't working) and ask for a new improved service > BRT. That might explain why it works (Hub and Spoke) in an on-again off-again way.

Response: The Hub-and-Spoke system was not set up in a manner with the intent to promote dissatisfaction in riders in order to promote the BRT Alternative.

9. When I saw some of the small business owners being interviewed on the 10:30 newscasts worrying about how the 'bus only' lanes would affect their businesses in Kalihii - along Dillingham Blvd., I had to write and ask that you and the other City and County departments and agencies that are going to be making the decisions on the BRT program to try it out before deciding.

Response: The BRT alignment through Kalihii will be on Dillingham Boulevard, from Middle Street to Kaahali Street with a Middle Street Transit Center, McNeil Street transit stop, Alakewa Transit Stop and Iwili Transit Center. Along this alignment are many retail establishments that serve the Kalihii Community. Participation from residents and business owners in the community has been actively solicited throughout project planning. A Kalihii Working Group was established comprised of Kalihii businesses, elected officials, and representatives from civic organizations to provide input and feedback to the engineering teams as they refined the details of the In-Town BRT for the FEIS. Substantial time was spent in the Kalihii Working Group developing alternative access to area businesses and establishing approaches for maintaining access to businesses during construction.

10. Consult the merchants and allow them to voice their needs and concerns about how the new system will impact their customers access to shopping center entrances and parking. Many of these businesses are small, have loyal clientele and are located not only in Waikiki and Kaimuki but Kalihii as well. Don't ignore this new system if it destroys the customer base of these older, well established and local businesses. Adapt the system to fit the small businesses along the way as well as the bus riders.

Response: Six community Working Groups were established based on geographic area: Pearl City/Aiea, Aliamanu/Salt Lake, Kalihii, Downtown/Kakaako, Mid-Town/University and Waikiki. The Working Groups were established to provide an opportunity for community groups, business representatives and other organizations to work out concerns directly with the project staff, subsequent to the MIS/DEIS being released and before the PE/FEIS process began. They provided a constructive forum in the designated geographic areas along the corridor, where specific opportunities were discussed simultaneously providing a greater in-depth understanding about BRT and what it means to the community. Community concerns were discussed in these meetings. For example, the Kalihii Working Group discussed the BRT alignment through Kalihii on Dillingham Boulevard. Along this alignment are many retail establishments that serve the Kalihii Community. Participation from residents and business owners in the community has been actively solicited throughout project planning. A Kalihii Working Group was established comprised of Kalihii businesses, elected officials, and representatives from civic organizations to provide input and feedback to the engineering teams as they refined the details of the In-Town BRT for the FEIS. Substantial time was spent in the Kalihii Working Group developing alternative access to area businesses and establishing approaches for maintaining access to businesses during construction.

11. I have been on BRT type transport systems in L.A., S.F. and in Europe -- Geneva, Frankfurt, Vienna, etc. and I love them. However in Europe they put the center bus only lanes on wide boulevards. Hawaii streets are narrow in comparison. If you widen our streets it would be so time consuming, disruptive to business and traffic and costly. If you don't widen them and put in a 2 bus only lane on a 4 lane street we might have constant traffic jams.

Response: The alignment and elements of the Refined LPA will be predominately within the existing roadway right-of-way in order to minimize right-of-way takes. The goal of the Refined LPA is to provide an attractive, affordable, dependable transportation option to the private automobile. The BRT Alternative increases the people carrying capacity throughout the Primary Corridor and preserves and improves the quality of life of Oahu's residents by improving transportation linkages within the Primary Corridor and between Kapolei and the Urban Core without the major impacts that street widening would produce.

12. *If you start the project without testing it first you might have costly mid-project changes, long completion delays and a system that doesn't work. We need to find the appropriate transit system for Honolulu - sized to our streets.*

**Response:** The proposed BRT system is based on ridership experience of the City's existing bus services, including the recently implemented CityExpress bus services that use much of the proposed BRT alignment, forecasts of BRT and local bus ridership using regional travel forecasting models, and input received at hundreds of public outreach meetings. A test without all features of the BRT system in place (i.e., limited stop operations in exclusive and semi-exclusive lanes using low-floor vehicles with level boarding through multiple doors and prepayment of fares) would be misleading and not a true test of the system. For example, the project proposes to completely reconstruct Dillingham Boulevard through the Kaali area to provide significant pedestrian amenities to facilitate access to BRT stations, as well as building new BRT stations and exclusive lanes in the center of the roadway. Without such major reconstruction, it would not be possible to provide the substantial time savings for transit riders through this corridor that would be offered by the Refined LPA. Most importantly, potential new riders would not likely perceive the demonstration service as permanent and would not be induced to change their travel mode.

13. *Please keep service of the Hub and Spoke system working at a high level whatever future plans and/or changes you are planning for the future.*

**Response:** The BRT is only one element of the transit plan for the Primary Transportation Corridor. The plan also includes conversion of the bus system to a hub-and-spoke network. The hub-and-spoke network will consist of new local circulator routes, as well as continuation of many existing line haul and express routes. Many existing bus routes will be re-routed to intersect with the BRT at or near the proposed BRT stops. The goal is to have an integrated network of transit services that provide convenient and cost-effective options for potential users.

14. *Please consult with small, medium and large businesses on their needs and concerns should you choose another bus system before approving or implementing that system.*

**Response:** Participation from residents and business owners in the community has been actively solicited throughout project planning. For more information about the project's public involvement program please refer to Appendix A of the FEIS. The latest outreach program was an organization of community working groups comprised of area businesses, elected officials, and neighborhood and civic organizations. The working group format provided an additional forum for area businesses to raise their concerns and for refinements to be incorporated into the project.

15. *Treat all economic levels of communities alike.*

**Response:** The Refined LPA treats all economic levels of communities alike.

16. *Test the system first with coning as several people testifying in Oct. 2000 requested.*

**Response:** See response to comment #12.

17. *Don't force or manipulate people into accepting a hidden agenda. It won't work in the long run.*

**Response:** There is no hidden agenda.

18. *I favor the BRT if it can be adapted to Oahu and Honolulu streets so that autos can function on the same streets reasonably smoothly.*

**Response:** The Refined LPA has been developed so that autos will be able to operate on the same streets as the BRT with less congestion than with the No-Build and TSM Alternatives.

19. *Another point that needs to be addressed is road work during the day at key intersections that cause long delays (not short delays).*

**Response:** The provisions to accommodate maintenance and construction projects within the BRT corridor will be similar to how construction projects within a lane are handled currently - the traffic will be detoured around construction/maintenance area. The technologies under consideration, the Embedded Plate, and the Hybrid-Electric propulsion systems both provide the flexibility to operate outside of the designated BRT lanes.

20. *Is the Hub and Spoke not working in Waipahu in a consistent way because you want people to complain about it so that you can further the BRT system?*

**Response:** Since the initial conversion to a hub-and-spoke operation in Leeward Oahu, refinements have been made to correct the problems first encountered.

21. *If the BRT had already been adopted why were you asking for testimony and why didn't you tell us in March that Hub and Spoke was so temporary and that BRT was the main goal.*

**Response:** At the time of the comment (Public Hearing on October 12, 2000) the BRT Alternative had not been adopted as the Locally Preferred Alternative. There seems to have been some confusion with the public meetings on the initial conversion to a hub-and-spoke system in Leeward Oahu, which is an immediate project, and the Primary Corridor Transportation Project, the focus is on the longer term transit system.

22. *According to Federal Law you can't make the decision without first presenting it to the public, explaining it and asking for testimony (which you did Oct 6, 12 and in several other meetings in October).*

**Response:** Comment noted. We concur.

23. *And it says here in the Leeward Oahu Community Transit Guide that timed connections at the hubs will make transfers fast and easy between community circulators, local and limited-stop express routes. Well, that's not happening. What you saw in this presentation was what's on paper. What's actually happening to people in Waipahu is a lot of missed connections and bus drivers who, when they see people running to catch the express buses, like the A Express from the circulator, they will not wait.*

**Response:** Based on comments like this, improvements have been made to Leeward Oahu hub-and-spoke operations.

24. *I have some recommendations that I just, you know, kind of put out. Allow more time for public comment. Two to three minutes is not enough time for complex issues that play such an important role in bus passengers' lives. You are mandated to hold public hearings. Please take the time to hear us and let other passengers from other areas hear us.*

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
659 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 523-4339 - Fax: (808) 523-4730 - Internet: www.cd.honolulu.hi.us



JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE "NEOPI" MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00546

November 13, 2002

Ms. Barbara J. Chung  
Page 6  
November 13, 2002

**Response:** Ms. Chung was granted more time to speak.

25. **No training bus drivers on the C or A routes until it is working well and most problems have been solved. Give us your best bus drivers in the initial period when it's getting established, the nicest, most intelligent, the strongest and the most physically handy, during -- for, say, three months. Hopefully, the best express drivers and supervisors at KTC, Kalih'i Transit Center.**

**Response:** Duty noted.

26. **No roadwork on routes during rush hours or during the day at busy intersections on the A or C routes unless it is temporary emergency. Have road repairs done at night, Downtown, Hotel, King Street, River Street, King, in Chinatown, Richards Street, Kaplanih'i Boulevard, beginning at Kaplanih'i and through and past University.**

**Response:** Construction scheduling may include nighttime construction in non-residential areas.

27. **Insert overseers for the transportation department capable of doing the work of a scheduler or a supervisor who has analysis experience at the KTA -- at the Kalih'i Transit Center. In other words, the transportation department at 711 Kaplanih'i should be ready on the spot at the Kalih'i Transit Center.**

**Response:** See response to comment #1.

28. **Give us a new circulator running from the Waipahu Transit Center to Dole, up Kunia Road to Village Park, stopping along Kunia Road along the north part of the road and going through to Milani on the west side, back on Kunia to Wahiawa, and then back to Waipahu.**

**Response:** Specific bus routings will be developed as part of the hub-and-spoke implementation process.

29. **Then run a bus from Waikiki to Waikole for tourists and residents.**

**Response:** Specific bus routings will be developed as part of the hub-and-spoke implementation process.

30. **Waikiki to Ala Moana Center, Downtown, Dillingham, freeway to Makalapa Gate, Arizona Memorial, Stadium, Pearlridge, Pearl City, Waipahu Transit Center to Waikole, Kam Highway, LCC and then back to Waikiki.**

**Response:** Specific bus routings will be developed as part of the hub-and-spoke implementation process.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover, if you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

Mr. John Ciesla  
98-099 Uao Place, PH-10  
Aiea, Hawaii 96701

Dear Mr. Ciesla:

Subject: Primary Corridor Transportation Project

This is in response to your testimony at the October 19, 2000 Special Transportation Committee Meeting regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. **Placing the bus turnaround facility at the Kam Drive-In property would be detrimental to all of our residents and condominium properties within a four-block radius. The noise, fumes, increased traffic and devaluation of our property would cause many of our owners and tenants to sell and move to other areas of the island. We currently tolerate high noise levels during both rush hours and the bus facility would stress their problems at least 16 hours a day.**

**Response:** The former Kamehameha Drive-In site is no longer being considered as a transit center.

2. **The economy has already decreased our property value and this would contribute to devaluation even more. The hub and spoke system is a great plan where we definitely need something like that. However, this particular hub affects almost 1,000 residential units in a four-block radius. Ours being 300, the property across the street near the church next to Kam has at least another 300, the building behind us has another 350.**

**Response:** The former Kamehameha Drive-In site is no longer being considered as a transit center.

3. **The residents of Lele Pono as well as myself are opposed to the Kam Drive-In facility and hope you will have the compassion to reevaluate and reconsider the current position.**

**Response:** The former Kamehameha Drive-In site is no longer being considered as a transit center.

4. **The site sounds like a good spot but to serve the Aiea and Pearl City, the commercial area bordered by Moanulua Road, Kaahumanu and Ohiana Place, the old Timbertown property, would be less detrimental to residential units and is still close to businesses and more homes without creating the aforementioned problems. It's all commercial and its residences are far enough away not to be affected by all the things I mentioned.**



**PRIMARY CORRIDOR TRANSPORTATION PROJECT**  
 Island of Oahu, Hawaii  
**SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT (SDEIS)**

Mr. John Ciesla  
 Page 2  
 November 13, 2002

Response: The former Timber Town property was evaluated as a potential transit center site, but was eliminated from consideration for similar reasons the Kamehameha Drive-in site was eliminated from consideration.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 627-6878. We appreciate your interest in the project.

Sincerely,

*Ceryll D. Soon*

CERYLL D. SOON  
 Director

The information you provide on this form will help the City & County of Honolulu and the Federal Transit Administration in the future planning of the Primary Corridor Transportation Project. We appreciate any comment you may have. Comments must be postmarked or received by May 7, 2002.

*W. J. 2002*  
 Name: Coll  
 Representing: \_\_\_\_\_  
 Address: 88 1778 Ala Moana Blvd. a3713  
Hon. HI

Please make any comments below:

*Boards are quite bad now - and many  
 but at other times of the day - this will  
 make things worse as people will not have  
 their cars & take public transport.  
 Please don't make things worse!*



DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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HONOLULU, HAWAII 96813  
Phone: (808) 523-4328 • Fax: (808) 523-4730 • Email: www.ci.honolulu.hi.us



JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE "KEOKI" MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00547

November 13, 2002

Mr. Victor & Ms. Made Cole  
1778 Ala Moana Blvd. #3713  
Honolulu, Hawaii 96815

Dear Mr. And Ms. Cole:

Subject: Primary Corridor Transportation Project

This is in response to your written comment at the April 20, 2002 public hearing regarding the Supplemental Draft Environmental Impact Statement (SDEIS).

*Roads are gridlock now - and very bad at certain times of the day - this will make things worst as people will not leave their cars home and take public transport. Please don't make things worse.*

Response: It is not the conversion of lanes that will result in congestion. The congestion for motorists will be there with or without the BRT. When people are diverted onto public transit, congestion for motorists will be less with the Refined Locally Preferred Alternative (LPA) than it would be with the No-Build or Transportation System Management Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

April 19, 2002

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
Municipal Building, Third Floor  
650 S. King Street  
Honolulu, Hawaii 96813

Dear Ms. Soon,

I'm writing to you in support of the Bus Rapid Transit System. Any improvement to our public transportation system is very much appreciated and I want to thank you and the administration for proposing a way to enhance our bus system.

My family and I have all used The Bus at one time or another. I remember as a young girl in Eva Beach how my mother used to catch the bus with my infant brother to drop off at the sitters before heading off to work...or when we all had to take the bus to school during my elementary and high school years...and although I formed during my first two years of college, my friends and I relied on the bus system for going places, to and from home, to end from work, to and from places where I volunteered after school. Even now that I have a car, I still rely on the bus when it needs maintenance and for shorter trips, and my children commute on the bus. My mother and aunts who are much older now in their golden years still depend on The Bus to get them places.

In support of this project, there are a few things I would ask for...a wish list if you would.

1. Accessibility of The Bus on main routes and into residential areas,
2. Safety/Security,
3. Timeliness/Efficiency,
4. Comfort,
5. Cost/Affordable.

Again, I want to sincerely thank you for your concern regarding our public transportation system that keeps everything moving. For every motorist that may feel the traffic jams during construction I say—I'm one too—we need to look at the bigger picture and the positive outcome...eventually less traffic.

Very truly yours,

Yolanda Coloma  
876 Curtis Street, #2308  
Honolulu, Hawaii 96813

APR 20 2002

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 522-4329 • Fax: (808) 522-4730 • Internet: www.cd.honolulu.hi.us

JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE "KEONI" MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00548

November 13, 2002

Ms. Yolanda Coloma  
876 Curtis Street, #2308  
Honolulu, Hawaii 96813

Dear Ms. Coloma:

Subject: Primary Corridor Transportation Project

This is in response to your April 19, 2002 letter regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. *I'm writing to you in support of the Bus Rapid Transit System. Any improvement to our public transportation system is very much appreciated and I want to thank you and the administration for proposing a way to enhance our bus system.*

Response: Thank you for supporting the project.

2. *My family and I have all used The Bus at one time or another. I remember as a young girl in Ewa Beach how my mother used to catch the bus with my infant brother to drop off at the sitters before heading off to work ... or when we all had to take the bus to school during my elementary and high school years ... and although I dived during my first two years of college, my friends and I relied on the bus system for going places, to and from home, to and from work, to and from places where I volunteered after school. Even now that I have a car, I still rely on the bus when it needs maintenance and for shorter trips, and my children commute on the bus. My mother and aunts who are much older now in their golden years still depend on TheBus to get them places.*

Response: We appreciate you sharing your experiences with the public transit system.

3. *In support of this project, there are a few things I would ask for ... a wish list if you would. 1. Accessibility of TheBus on main routes and into residential areas, 2. Safety/Security, 3. Timeliness/Efficiency, 4. Comfort, 5. Cost/Affordable.*

Response: Comment noted. No response required.

Ms. Yolanda Coloma  
Page 2  
November 13, 2002

4. *Again, I want to sincerely thank you for your concern regarding our public transportation system that keeps everything moving. For every motorist that may feel the traffic jams during construction I say - I'm one too - we need to look at the bigger picture and the positive outcome ... eventually less traffic.*

Response: Again, thank you for supporting Honolulu's public transportation system.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE KEONO MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00549

November 13, 2002

Mr. Bruce Coppa  
c/o Pacific Resource Partnership  
1001 Bishop Street, Pacific Tower  
Suite 1501  
Honolulu, Hawaii 96813

Dear Mr. Coppa:

Subject: Primary Corridor Transportation Project

This responds to your comment on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS). We are responding to your testimony at the November 14, 2000 Special Transportation Committee Meeting supporting the In-Town BRT as the Locally Preferred Alternative (LPA). Thank you for supporting the project.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE KEONO MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00550

November 13, 2002

Mr. Joseph Cordero  
1616 Liholiho Street  
Honolulu, Hawaii 96822

Dear Mr. Cordero:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. *I speak maybe in a sense for persons with disabilities. I agree with the gentleman who was about the second speaker on today, who talked about looking down the corridor a little bit. And that goes with, because Hawaii is such a beautiful place to live, and people live longer here, we have to think about our senior citizens.*

Response: Comment noted. No response required.

2. *I happen to know that Les Keiter, who is a famous sports announcer, is now dependent on public transportation when he goes to work and performs his duties. And so a lot of senior citizens that will be living much longer will not be able to use their vehicles in the future. So we want to think about them, as well as persons with disabilities, mothers who have to go shopping, students who are not old enough to purchase vehicles. So we have to think about the large number of people who do use different facilities, school, work, commercial areas, and we have to make it so that they too have access.*

Response: We appreciate your insight into the service that public transportation provides to all of Honolulu's residents.

Mr. Joseph Cordero  
Page 2  
November 13, 2002

3. *Because if we limit transportation only to car users, that means the other people have to stay home pretty much with all the cars on the road and being unable to get to and from where they're going with the buses. So we want to make sure that we think about our senior citizens, persons with disabilities, and mothers with children who maybe don't have the kinds of money to be able to purchase vehicles and use the highways. So we want to look down the line, and we ought to think about that.*

Response: Thank you for your support of the project.

4. *One last thing I do mention, that, in just one year alone, Hawaii placed 250,000 extra vehicles on the roads. So we have to think for the future as well.*

Response: Comment noted. No response required.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE WAKAI MIYAMOTO  
DEPUTY DIRECTOR

TPD002-00551

November 13, 2002

Mr. Roger Couture  
2550 Kuhio Avenue #2402  
Honolulu, Hawaii 96815

Dear Mr. Couture:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. *When we first started coming here several years ago, we noticed that - a lack of need for our needs was we would not need a car. When we did move here, we sold our cars back on the mainland, and leaving us the option to be able to rent if need or to purchase if need. And in the few years that we have lived here, we haven't had to do neither. Fortunately, for the quality of the bus system that we do have presently, it has satisfied our needs. I still leave the option open, too, that, in the future, that a car would be necessary for us. But for the location that we're situated in, in Waikiki down by the zoo, the bus system more than meets our needs presently.*

Response: Thank you for sharing your reasons for using Honolulu's public transit system.

2. *I realize that, in the future, that improvements would have to be made. I'm not very knowledgeable about that. In fact, not knowledgeable at all. But all I can talk about is the needs we have, which are presently being met quite satisfactorily.*

Response: We appreciate you taking the time to come to the public hearing and share your experiences.

We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
150 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96815  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOOH  
DIRECTOR

GEORGE WOOD • LEVIA MOTO  
DEPUTY DIRECTOR

TPD002-00552

November 13, 2002

For the city and county to spend so much money to subsidize the 10% ridership certainly appears to be irresponsible. We, as taxpayers, may be committing ourselves to a billion dollar expense, plus a hefty subsidy for bus riders. The current bus transportation from Waikiki to downtown is very satisfactory and does not rob us of traffic lanes. The new rapid transit will not help tourism. We should instead concentrate on removing all uninsured automobiles from the streets and highways. This is estimated to be 20 to 25 percent of autos on the roadways. It would reduce traffic, make driving safer, and reduce the cost of our auto insurance. The voters will remember those who support this ridiculous idea.

Mary Cowing  
2240 Kuhio Ave., Apt. #3506  
Honolulu, HI 96815  
(808) 922-8520

Ms. Mary Cowing  
2240 Kuhio Avenue  
Apartment 3506  
Honolulu, Hawaii 96815

Dear Ms. Cowing:

Subject: Primary Corridor Transportation Project

This is in response to your written testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. For the city and county to spend so much money to subsidize the 10% ridership certainly appears to be irresponsible.

Response: Transit systems throughout the nation are subsidized. The reasons for doing so include the recognition that many members of the community are either too young, too old, too poor, or are physically unable to drive a car, and are therefore dependent on public transportation for their mobility. Additionally, it is viewed as more cost effective to spend public funds subsidizing transit than on building new or widened roads to accommodate these same people in automobiles.

The annual per capita subsidy will vary slightly from year to year as the Refined LPA is implemented, but in current dollars (i.e. without the effects of inflation) the subsidy will be about the same as today. This is because the system will grow in direct proportion to the growth in population.

2. We, as taxpayers, may be committing ourselves to nearly a billion dollar expense, plus a hefty subsidy for bus riders.

Response: Comment noted. No response required.

Ms. Mary Cowing  
Page 2  
November 13, 2002

3. *The current bus transportation from Waikiki to downtown is very satisfactory and does not rob us of traffic lanes.*

Response: The Iwilei -Waikiki In-Town BRT branch will not follow the same routing as present bus routes and will connect with some destinations not presently served by buses. It will not rob motorists of traffic lanes. In fact new lanes will be added along sections of Ala Moana Boulevard and Kalia Road.

4. *The new rapid transit will not help tourism.*

Response: As the MIS/DEIS, SDEIS, and FEIS Chapter 1 state, the purpose of the project is to increase the people-carrying capacity of the transportation system; support desired development patterns, improve the transportation linkage between Kapolei and Honolulu's Urban Core, and to improve the transportation linkages between the Primary Urban Center communities. As such the BRT system is designed to complement the private transportation services which serve visitors, not compete with them. Many of the proposed improvements in the Refined LPA will benefit tourists by making Waikiki more environmentally and pedestrian friendly.

5. *We should instead concentrate on removing all uninsured automobiles from the streets and highways. This is estimated to be 20 to 25 percent of autos on the roadways. It would reduce traffic, make driving safer, and reduce the cost of our auto insurance.*

Response: Comment noted. It is beyond the scope of this project to address uninsured automobiles.

6. *The voters will remember those who support this ridiculous idea.*

Response: Comment noted. No response required.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

City and County of Honolulu  
Department of Transportation Services  
Cheryl D. Soon - Director  
711 Kapiolani Blvd, Suite 1200  
Honolulu, HI 96813

November 4, 2000

RE: DEIS - PRIMARY CORRIDOR TRANSPORTATION PROJECT

Dear Ms. Soon and Oahu Transportation Planners;

I would appreciate your addressing the following concerns in the forthcoming EIS:

1. Economic justice and its mitigation are not fully or fairly investigated in the DEIS, especially in regards to the low income, large minority community of Kalihi-Palama. The DEIS's suggestion that such disadvantaged neighboring residents will be fortunate to have better transit opportunities, ignores the many negative impacts the community will suffer and that the motivating purpose of the project is the movement of Leeward, Ewa, and Mililani populations into the PUC. The community character will initially be shaken by major transit construction, then permanently altered as a major transit corridor displaces local and neighborhood commerce with development orientated at a transit corridor.
2. The DEIS does not fully address the existing flows of neighborhood vehicle traffic and how they will be negatively impacted by the loss of general use traffic lanes. Many local, non-transit trips that flow on Dillingham or across Dillingham will face considerable time or rerouting impacts.
3. The Kalihi-Palama region has many substandard streets without sidewalks or drainage that continue to be ignored by government funding, however the same government agencies are more than willing to take major portions one of the few adequate thoroughfares (Dillingham Blvd) in order to provide commute benefits to Leeward Oahu.
4. There are many signal controlled intersections within the Kalihi-Palama region that do not have advance turn greens or turn lanes. An EIS should require such basic traffic improvements to the existing region prior to the traffic dislocations that will result from the DEIS proposal.

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOOH  
DIRECTOR


GEORGE WAKO  
DEPUTY DIRECTOR

TPD1100-05415R

November 13, 2002

5. The DEIS does not develop specific criterion to measure the success or failure of the proposals, or what actions should be taken should the proposals fail to measure up to a successful standard.
6. The DEIS does not consider a single, reversible BRT project that would only remove 1 lane from existing streets. Such a reversible model would give exclusive lane priority only during rush hours in the high demand direction. At all other times, no lane exclusivity is needed as the DEIS statistical model only projects rush hour congestion.

Thank you for addressing the above issues.

Respectfully,  
  
Bill Craddick  
1556 Puolani Street  
Honolulu, HI 96819

Mr. Bill Craddick  
1556 Puolani Street  
Honolulu, Hawaii 96819

Dear Mr. Craddick:

Subject: Primary Corridor Transportation Project

This is in response to your November 4, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. *Economic justice and its mitigation are not fully or fairly investigated in the DEIS, especially in regards to the low income, large minority community of Kalihi-Palama. The DEIS's suggestion that such disadvantaged neighboring residents will be fortunate to have better transit opportunities, ignores the many negative impacts the community will suffer and the motivating purpose of the project is the movement of Leeward, Ewa, and Miliani populations into the PUC. The community character will initially be shaken by major transit construction, then permanently altered as a major transit corridor displaces local and neighborhood commerce with development oriented at a transit corridor.*

cc. Governor, State of Hawaii  
Parsons, Brinckerhoff, Quade, and Douglas, Inc.

**Response:** The Final Environmental Impact Statement (FEIS) includes discussion of whether the project will cause disproportionately high and adverse effects on minority and low-income populations' health or environment in accordance with the Executive Order on Environmental Justice. Although the project would improve public transit service for Leeward and Central Oahu communities, it would also substantially improve transit service for those communities within the urban core such as Kalihi-Palama. Although the community will need to endure construction phase impacts, once completed the In-Town BRT will have substantially upgraded and beautified Dillingham Boulevard as a community serving street rather than it remaining as a commuter route which it is today during rush hours.

2. *The DEIS does not fully address the existing flows of neighborhood vehicle traffic and how they will be negatively impacted by the loss of general use traffic lanes. Many local, non-transit trips that flow on Dillingham or across Dillingham will face considerable time or rerouting impacts.*



Response: The FEIS contains a traffic analysis of the Dillingham Boulevard corridor. First, the analysis shows that the enhanced transit system provided by the Refined LPA would attract more transit riders, resulting in a reduction of vehicular demand within the corridor. This reduction, along with other anticipated transportation improvements within the corridor, would allow Dillingham Boulevard to have comparable traffic levels of operation as the No Build Alternative. At the same time, the ability to move people along the Dillingham Boulevard corridor would increase from 2,890 persons per hour to 8,140 persons per hour.

3. *The Kalihī-Palama region has many substandard streets without sidewalks or drainage that continue to be ignored by government funding, however the same government agencies are more than willing to take major portions one of the few adequate thoroughfares (Dillingham Blvd.) in order to provide commute benefits to Leeward Oahu.*

Response: As part of the Refined LPA Dillingham Boulevard will be totally reconstructed with new pavement, sidewalks and landscaping. The BRT will be as much a benefit for Kalihī-Palama residents as for Leeward Oahu residents. It will give residents of Kalihī-Palama faster, more reliable public transit service to destinations throughout the island.

4. *There are many signal controlled intersections within the Kalihī-Palama region that do not have advance turn greens or turn lanes. An EIS should require such basic traffic improvements to the existing region prior to the traffic dislocations that will result from the DEIS proposal.*

Response: Traffic signal improvements along Dillingham Boulevard and several adjacent streets are included as part of the project.

5. *The DEIS does not develop specific criteria to measure the success or failure of the proposals, or what actions should be taken should the proposals fail to measure up to a successful standard.*

Response: The Refined LPA will be implemented as a series of smaller projects over a 15-year period. At each step of the way there will be ample opportunity to evaluate the performance to date and whether any modifications to the plan are needed. This flexibility in implementation is one of the advantages of a bus based system compared to a rail system.

6. *The DEIS does not consider a single, reversible BRT project that would only remove one lane from existing streets. Such a reversible model would give exclusive lane priority only during rush hours in the high demand direction. At all other times, no lane exclusivity is needed as the DEIS statistical model only projects rush hour congestion.*

Response: Reversible lanes are only possible where there is a directional imbalance during the hours of use. The existing and proposed zipper lanes on H-1 are examples of where this concept has been integrated into the BRT project. Dillingham Boulevard and Kapoli Boulevard are the only In-Town BRT streets where a reversible lane operation might be possible. The reversible lane operation on Kapoli Boulevard is proposed to

be retained after implementation of the BRT from Atkinson Drive eastward to King Street. The BRT would operate in mixed traffic through this section. A reversible lane operation on Dillingham Boulevard was looked at and rejected because: 1. Using traffic cones to delineate a reversible, exclusive BRT lane during the peak hours would result in time savings for the BRT in the dominant direction of travel, but would not provide travel time savings for the BRT during the rest of the day; 2. U-turns at intersections and left-turns across the cored BRT lane would not be allowed due to safety conflicts. This would significantly affect access to businesses during times when the coning is in place; 3. There would be significant operational delays to traffic on Dillingham Boulevard during the transitions from non-peak to peak conditions and back again. These transitions would occur in the morning and afternoon; and 4. Median BRT passenger platforms would pose safety hazards and/or require extra roadway widening with a reversible BRT lane.

We will send you a CD-ROM copy of the FEIS under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE "KEOKI" MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

Ms. C. C. Curry  
91-1476 Renton Road, #10  
Ewa, Hawaii 96706

Dear Ms. Curry:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the September 25, 2000 Special Transportation Committee Meeting regarding your comment on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

*I support this with reservations for specific and immediate modifications. The modifications involve four different categories. Both the BRT, express, park and rides, pedestrian suggestions, Handi-Van compliance with the federal litigation is hanging over right now and the suggested partnership with City County and the State with the ferry. And I have illustrations of how we can use the existing resources right now, immediately, to a better advantage.*

**Response:** Your comment has been duly noted.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE "KEOKI" MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

Mr. Mike Dahilig  
95-1081 Milia Street  
Mililani, Hawaii 96789

Dear Mr. Dahilig:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

*1. My name is Mike Dahilig, and I'm currently a geology and geophysics major at the University of Hawaii at Manoa. I am the president elect of the Associated Students of the University of Hawaii next year. But I am here to express and represent only my personal opinions on the Bus Rapid Transit project. I have been commuting from Mililani to the Downtown area since my kindergarten days at Punahou. So if I may, I would consider myself somewhat of a knowledgeable commuter. I'm here today to speak in support of the Bus Rapid Transit system.*

**Response:** Thank you for taking the time to attend the public hearing and for supporting the project.

*2. I am concerned about the long-term future of Honolulu. Our traffic problems are obviously not going to get any better. We are in need of a solution that is imaginative, innovative and in concert with the unique aesthetics of our city. We need a transportation solution that will improve the overall quality of life for all of us. We need an alternative that can bring us from place to place, that is convenient, easier, fast and predictable. And I feel that BRT can provide that.*

**Response:** This is a statement of support. No response required.

TPD02-00553

Mr. Mike Dahillig  
Page 2  
November 13, 2002

3. *Young people are acutely aware that fossil fuels are a finite resource, so we need to be energy-efficient. Pollution by harmful emissions is also another concern. We need an alternative that is environmentally friendly and saves money and time.*

Response: Comment noted.

4. *Many progressive modern cities have committed to rapid transit for a reason. It is simply common sense. Unless we are in complete denial, growth happens. So we need to look and think long-term to be ready. If we tell our young people that we restrict and stifle reasonable growth in Honolulu, many more young people will seek their fortunes on the mainland instead of staying home. I humbly urge the City and County of Honolulu to continue moving forward with the Bus Rapid Transit project.*

Response: This is a statement of support. No response required.

We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

TESTIMONY  
Of  
Beadie Karahelo Dawson  
Before the City Council Committee on Transportation

Thursday, October 28, 2000  
6:30 PM

Good evening Committee Chair Bainum and members of the Transportation Committee.

My name is Beadie Karahelo Dawson. I am Chief Executive Officer and General Counsel for two small businesses located in Honolulu: Dawson Group, Inc., and Dawson International, Inc. I am testifying this evening in support of the Bus Rapid Transit, or BRT alternative.

Hawaii's two greatest enemies are: too many automobiles and too much urban sprawl. In Honolulu, these two monsters have reached crisis proportions. We've argued about solutions for years while the problem has become steadily worse. Doing nothing is not an option.

As a businessperson, I believe that we are spending far too much time in our automobiles. People are wasting too much time in their cars. Lost time means lost productivity, and in business, time is money. How can employees arrive fresh and ready to work if they have to wake up at 5 AM to fight the morning rush our traffic to get to work by eight? And then repeat the fight every afternoon?

I am also concerned about the toll commuting takes on our employees and our workforce. It is no secret that some of our employees and countless others spend as much as three hours each day driving to and from work in town. Time lost in traffic is valuable time that can be spent with our families and loved ones. We need to wear ourselves off of the automobile, through better options in public transportation. The BRT is the best way to accomplish this, because it is the most comprehensive of the three alternatives, and provides an attractive, efficient and viable alternative to the private automobile.

Second, I have great concern for our environment and our need to protect it. The costs associated with the private automobile are huge. We devote too much land and resources to our automobile dependence. We cannot continue to build more highways or roads, or double deck our freeways. Roadways and parking lots are expensive to build, and take up valuable land that could be used as parks and green-space. Automobiles pollute the air and water. The BRT alternative will benefit the environment by reducing gasoline consumption and its associated pollutants. A high capacity in-town bus rapid transit system powered by an electric or hybrid motor would be cleaner running than cars, and produce less air pollution or noise.

Third, the BRT alternative will shape orderly development in Honolulu and minimize urban sprawl. It will focus growth within the primary urban center and the second city of

Kapolei. This will help protect what little rural area we have left from further growth, help to preserve open space and help "keep the country country".

Clearly, the BRT alternative will benefit our community and I urge the Council to endorse it. These improvements to our public transportation system are long overdue. Thank you for allowing me to testify this evening.

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JEREMY HARRIS  
MAYOR



CHEERL D. SOOH  
DIRECTOR

GEORGE KEDOKI MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00554

November 13, 2002

Ms. Beadie Kanahahele Dawson  
Chief Executive Officer and General Counsel  
C/o The Dawson Group, Inc.  
900 Fort Street Mall, Suite 810  
Honolulu, Hawaii 96813

Dear Ms. Dawson:

Subject: Primary Corridor Transportation Project

This is in response to your October 26, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. I am testifying this evening in support of the Bus Rapid Transit, or BRT alternative.

Response: Comment noted. Thank you for supporting the project.

2. I am also concerned about the toll commuting takes on our employees and our workforce. It is no secret that some of our employees and countless others spend as much as three hours each day driving to and from work in town. Time lost in traffic is valuable time that can be spent with our families and loved ones. We need to wear ourselves off of the automobile, through better options in public transportation. The BRT is the best way to accomplish this, because it is the most comprehensive of the three alternatives, and provides an attractive, efficient and viable alternative to the private automobile.

Response: Comment noted.

3. Second, I have great concern for our environment and our need to protect it. The costs associated with the private automobile are huge. We devote too much land and resources to our automobile dependence. We cannot continue to build more highways or roads, or double deck our freeways. Roadways and parking lots are expensive to build, and take up valuable land that could be used as parks and green-space. Automobiles pollute the air and water. The BRT alternative will benefit the environment by reducing gasoline consumption and its associated pollutants. A high capacity in-town bus rapid transit system powered by an electric or hybrid motor would be cleaner running than cars, and produce less air pollution or noise.

Response: Comment noted.

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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE 'KEONI' MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00555

November 13, 2002

Ms. Beadia Kanahelo Dawson  
Page 2  
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4. *Third, the BRT alternative will shape orderly development in Honolulu and minimize urban sprawl. It will focus growth within the primary urban center and the second city of Kepoiki. This will help protect what little rural area we have left from further growth, help to preserve open space and help "keep the country country".*

Response: Comment noted. The DTS concurs with this statement.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

Ms. Eve DeCoursey  
9630-A 18<sup>th</sup> Avenue  
Honolulu, Hawaii 96816

Dear Ms. DeCoursey:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. *I'm a resident of Kaimuki. I am a 22-year resident of Honolulu. As a runner, daily dog walker motorist, occasional bus rider, and avid cyclist - in fact, I'm such an avid bicyclist that I am a Hawaii state champion. I was invited to the national championship in 1985. I mention these 70,000 miles that I've ridden on Oahu streets and roads because it's relevant to what I'm going to say. Over the 22 years that I've put all these miles on the bike on the roads, I've noticed many things. You notice a lot when you're out there on a bike and not surrounded by a lot of steel. I've noticed a great increase in vehicles, and it's amazing how many of them are single occupancy vehicles. Unfortunately, as I've watched the traffic increase, I've watched the aloha deteriorate.*

Response: Comment noted.

2. *I became so fascinated with the subject of mobility and access that I served for 15 years as the executive director for the Hawaii Bicycling League. And in this capacity, I attended several sustainable community conferences on the mainland. It is a fact that the first and most important step to bringing our communities to the point of being sustainable is to provide transportation choices. And I'd like to commend the City and County of Honolulu for taking this step to prevent potential traffic disaster.*

Response: Comment noted.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**

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CHERYL D. SOON  
DIRECTOR  
GEORGE "KEO" MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00556

November 13, 2002

Mr. John Dell  
Page 2  
November 13, 2002

**Response:** Comment noted. No response required.

5. *And by the way, for those of you who don't know it, we have been running special buses up and down the routes for several years. This is the prelude to see if BRT may be feasible in certain areas.*

**Response:** Comment noted. No response required.

6. *What I'm hearing today is you've taken the system and torn it to shreds. That wasn't the original intention. The original intention was take this system; every community, if you have a problem, voice your problem to that segment of the community. Nothing was written in stone. As it sits right now, it still isn't written in stone. But you guys want to beat up the people who came in with the brain power and said, "What if we try this?" Well, if you have a better solution, give it. Don't sit there and be the silent majority.*

**Response:** Comment noted. No response required.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

JEREMY HARRIS  
MAYOR

Mr. John Dell  
1521 Palapala Place  
Honolulu, Hawaii 96817

Dear Mr. Dell:

Subject: Primary Corridor Transportation Project

This is a combined response to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding to your comments in two Parts. Part A responds to the comment you made regarding the MIS/DEIS at the November 14, 2000 Transportation Committee meeting and Part B responds to the oral comments you made at the SDEIS April 20, 2002 Public Hearing.

Part A - MIS/DEIS Comments

1. *Supported the Bus Rapid Transit Alternative as the locally preferred alternative.*

**Response:** Thank you for supporting the project.

Part B - SDEIS Comments

2. *I am the Transportation Chair of the Neighborhood Board 15. I am the Sitting Chair with the Kalia-Palapa Vision Team. I am also a commissioner with the Department of Transportation. That's an uncompensated position, if anybody asks. I don't get paid. We make the rules, but we don't get paid for it.*

**Response:** Comment noted. No response required.

3. *The reason I appreciate speaking today to you is this: Dillingham corridor falls flat in the middle of my area. That area is one that is a bone of contention. I've heard it addressed. I've heard people say they're unhappy. Well, your neighbors made this decision. If you're unhappy with your neighbor, let's talk to your neighbor and get them at the next meeting right here. Don't beat up on the City. They didn't do it, believe it or not. You want to beat somebody, 225 pounds right here, and I'll take on a New York cop in a minute. I happen to have been a State sheriff here.*

**Response:** No response required.

4. *Now, let me get this straight. If you're going to talk about the BRT, this island is 22 by 60. We have a multitude of cars every year. And once - and the growth of maturity of our own people states this, that every generation has to have a car to prove maturity. We know that. But how about the people who cannot move? The ones who are in the homes, the ones who need to go to the hospital, the ones who need to see their doctor? Let's have options. We use the bus.*

**PRIMARY CORRIDOR TRANSPORTATION PROJECT**  
 Island of Oahu, Hawaii  
**SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT (SDEIS)**

The information you provide on this form will help the City & County of Honolulu and the Federal Transit Administration in the future planning of the Primary Corridor Transportation Project. We appreciate any comment you may have. Comments must be postmarked or received by May 7, 2002.

Name: Betty Downing  
 Representing: Myself  
 Address: 1777 Ala Moana Blvd # 729  
Honolulu, HI 96815

Please make any comments below.

*I'm a transplant from California (aka my husband) and we are avid riders of TheBus. It's great! I believe, as some of the speakers advocated 4/20/02, that service must be expanded and improved - but KEEP IT AS IS. As it is. We are island residents now, 2-1/2 years and feel your transportation system is one of the best in the U.S.*

*Also - we are already suggested let's get OFF the roads. Those who are driving cars illegally. We could eliminate 25% of the congestion. IT'S NOT THAT DIFFICULT!*

DEPARTMENT OF TRANSPORTATION SERVICES  
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CHERYL D. SOON  
 DIRECTOR  
 GEORGE KEOHO MATSUOKA  
 DEPUTY DIRECTOR

November 13, 2002

TPD02-00557

Ms. Betty Downing  
 1777 Ala Moana Boulevard, #729  
 Honolulu, Hawaii 96815

Dear Ms. Downing:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

- Response: We appreciate your support of Honolulu's present public transit system. A future monorail would be lovely, but not a solution for now. Let's spend what money we have on service improvements.
- Response: Comment noted.
- Response: Illegal drivers are beyond the scope of the project. We appreciate your interest in the project.

Sincerely,  
  
 CHERYL D. SOON  
 Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE WECOU \*UKIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD02-00558

Mr. Justin Enomoto  
91-1001 Keiheenui St.  
Ewa Beach, Hawaii 96706

Dear Mr. Enomoto:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. I've been a former single driver into the Downtown community and currently switching into the bus system. I found that the bus is a more convenient, as well as efficient, method of transportation into the town district, saving myself at least a hundred dollars in parking fees as compared to a \$27 bus pass. I feel that, if more people were to use the bus, that, obviously, traffic would be decreased in the Downtown district.

Response: Comment noted. No response required.

2. In regards to all the commuters from the villages, as some people have referenced it, as far as Ewa Beach, Weienae, Nanakuli, all these people are coming to the Downtown area, if we don't start increasing in the bus users in that area, all these cars are coming into Downtown, causing more traffic. If they stop using the bus, then there's obviously nowhere that they're going to be able to park.

Response: Comment noted. No response required.

3. So as far as my support for the BRT, I feel that any improvements and enhancements that can be made towards a great system already, I'm full in favor of it. And I would suggest that many of you start using the bus as well.

Response: We appreciate your support of the project and for attending the public hearing.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE WECOU \*UKIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD02-00559

Mr. Wes Frysztacki  
711 Kapiolani Boulevard, Suite 275  
Honolulu, Hawaii 96813

Dear Mr. Frysztacki:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. I am a three-year resident on Piikoi. And I'm speaking in favor of BRT for two reasons.

Response: Thank you for supporting the project and attending the public hearing.

2. One, as a resident, I will directly benefit from two of the branches that will be in easy walking distance.

Response: Comment noted. No response required.

3. And also because, last night, I was on route eight, and it was not only a seated load, it was a standing load, and it was passing people up. We don't need to make ridership projections. That ridership is already there. The system is essentially at capacity.

Response: Thank you for sharing your experience regarding your bus ride and passenger being passed up.



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CITY AND COUNTY OF HONOLULU  
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JEREMY HARRIS  
Mayor

CHERYL D. SOON  
DIRECTOR  
GEORGE KEONI LUKAJIOTO  
DEPUTY DIRECTOR

TPD02-00560

November 13, 2002

Mr. Wes Fryszacki  
Page 2  
November 13, 2002

4. The second reason I wanted to speak in favor of BRT is because I'm also the project manager for the hub-and-spoke process. I appreciate the many comments in favor of hub-and-spoke. That is a process now that has been going on for three years. It is divided up into five phases. The first two phases have already been completed. The first phase was on the Leeward side. Those routes have been in operation now for about a year and a half. The second phase was Central area, and those recommendations are included in the current City budgets under deliberation.

Response: Comment noted. No response required.

5. Many people in those areas appreciate what we've been able to do. They also understand that they will continue to benefit, because the country express routes that are in operation and will continue to be improved are reliant on the BRT improvements. It is one of the same. It is a total package. The p.m. zipper lane, the improvements along Kamehameha, the in-town trolley, are all part of the same system. We cannot pick and choose. At this point, if we do not proceed, then we have also killed hub-and-spoke for the meantime until we can rethink the SDEIS. I ask you not to do this.

Response: This is a statement of support. No response required.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

Mr. Alan Fujimori  
1350 Ala Moana Boulevard  
Apartment 712  
Honolulu, Hawaii 96814

Dear Mr. Fujimori:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony regarding the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS). Your testimony at the November 14, 2000 Special Transportation Committee Meeting supported the In-Town BRT as the Locally Preferred Alternative (LPA). Thank you for supporting the project.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 523-4529 • Fax: (808) 523-4730 • Internet: www.cc.honolulu.hi.us



JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE "GEORGE" MIYAMOTO  
DEPUTY DIRECTOR

APR 20 2002

Bennett Fung  
1561 Kanunu Street #1601  
Honolulu, HI 96814

November 13, 2002

TPD02-00561

Mr. Albert Fukushima  
1841 Palamot St.  
Pearl City, Hawaii 96782

Dear Mr. Fukushima:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. *My name is Albert Fukushima, chairman of the Pearl City Neighborhood Board, and I would like to express our board's support of the BRT system, particularly that the Keonohi Street off-ramp and the Kam Highway Drive-in transit center has been eliminated. And, basically, we favor that Luapele street on-ramp.*

**Response:** This is a statement of support. No response required.

2. *But we would also like to express our request to expedite the implementation of the Kamehameha Highway corridor chart that the Alea/Pearl City Working Group did come out, and, basically, it's covered in the progress report number six, that we have our own separate system serving Alea/Pearl City with the three transit centers.*

**Response:** The Kamehameha Highway improvements are proceeding as an independent project by the City. They are included as a systemwide element in the financial plan (Chapter 6).

3. *And the only thing that I'd like to add was our concerns brought up is that, as part of the improvements of the highway system, that the Alea/Pearl City be given an opportunity to get into the zipper lane.*

**Response:** The Luapele Drive ramp will permit buses serving Pearl City, Alea, Aliamanu, Salt Lake, and Foster Village to access the zipper lanes.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

Date: April 17, 2002

Subject: I support the proposed BRT

To Whom It May Concern:

How long did you sit in traffic today? Do you remember the oil embargo? If you think the existing bus system is pretty good, what do you think of the BRT that is much better? There are just a few of the reasons I support the proposed BRT.

We tend to make decisions based on what we see and how we feel today. If we take that attitude with BRT and oppose BRT, we are making a mistake. Not only will BRT help make Oahu a better place to live, improve the quality of life, it is a project for our future, just like how you and I do our best for the future of our family.

BRT is the right mass transit project for Oahu. It will not solve all our traffic problems, but it is the biggest bang for our bucks. To solve our traffic problem, it takes YOU to get out of YOUR car and start using the BRT.

Yours truly,

Bennett Fung

**PRIMARY CORRIDOR TRANSPORTATION PROJECT**  
 Island of Oahu, Hawaii  
**SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT (SDEIS)**

The information you provide on this form will help the City & County of Honolulu and the Federal Transit Administration in the future planning of the Primary Corridor Transportation Project. We appreciate any comment you may have. Comments must be postmarked or received by May 7, 2002.

Name: Cipric Galina  
 Representing: EMA Beach HI 9607  
 Address: 91-925-A5 North Rd  
East Beach, HI

Please make any comments below:

*I am still grasped about the BRT for it will help  
 speed the commuter going to their destination. But fear  
 I wish if the BRT will come or include East Beach  
 to be one of its route.  
 I thank to much and appreciate the very much.*

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
 650 SOUTH KING STREET, 3RD FLOOR  
 HONOLULU, HAWAII 96813  
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CHERYL D. SOON  
 DIRECTOR  
 GEORGE "KONG" MIYAMOTO  
 DEPUTY DIRECTOR

TPD02-00562

November 13, 2002

Mr. Bennett Fung  
 1561 Kanunu Street, #1601  
 Honolulu, Hawaii 96814

Dear Mr. Fung:

Subject: Primary Corridor Transportation Project

This is in response to your April 17, 2002 letter regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. How long did you sit in traffic today? Do you remember the oil embargo? If you think the existing bus system is pretty good, what do you think of the BRT that is much better? These are just a few of the reasons I support the proposed BRT.

Response: Thank you for supporting the project.

2. We tend to make decisions based on what we see and how we feel today. If we take that attitude with BRT and oppose BRT, we are making a mistake. Not only will BRT help make Oahu a better place to live, improve the quality of life, it is a project for our future. Just like how you and I do our best for the future of our family.

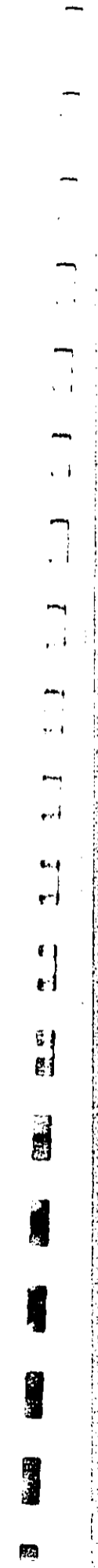
Response: We concur.

3. BRT is the right mass transit project for Oahu. It will not solve all our traffic problems, but it is the biggest bang for our bucks. To solve our traffic problem, it takes YOU to get out of YOUR car and start using the BRT.

Response: We concur and again thank you for supporting the project.

We appreciate your interest in the project.

Sincerely,  
  
 CHERYL D. SOON  
 Director



DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE YEKOKI MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00568

November 13, 2002

Mr. Ciprie Galima  
94-925-A-5 North Road  
Ewa Beach, Hawaii 96706

Dear Mr. Galima:

Subject: Primary Corridor Transportation Project

This is in response to your comment at the April 20, 2002 public hearing regarding the Supplemental Draft Environmental Impact Statement (SDEIS).

*I am happy and grateful about the BRT for it will help much the commuters going to their destination. But how I wish if this BRT will come or include Ewa Beach to be one of its route. I thanks to much and appreciate this very much.*

Response: There will be buses serving Ewa Beach that connect to the Regional BRT through the transit center at Hukimoe Street and the park-and-ride at North-South Road.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
630 SOUTH KING STREET, 3RD FLOOR  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE YEKOKI MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00568

November 13, 2002

Mr. Larry Geller  
3264 Melemele Place  
Honolulu, Hawaii 96822

Dear Mr. Geller:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. *I came to testify in opposition to this plan.*

Response: Thank you for attending the public hearing and expressing your opinion about the project.

2. *I do not oppose rapid transit.*

Response: Comment noted, no response required.

3. *I was raised in New York where subways and buses – to go to high school and college during my life. Then moved to Tokyo, with an excellent rapid transit system. I've been to Portland, Singapore – and so forth. So I'm not an enemy of the transit system.*

Response: Comment noted, no response required.

4. *I guess I was under the mis-impression that there would be decision-makers, in other words, folks from the City Council here today to hear the testimony. And I apologize for that.*

Response: Comment noted, no response required.

5. *I think your job is probably to hear us and then just go do this anyway.*

Response: Comment noted, no response required.

6. *So I would like to address my testimony to the decision-makers who are present in this room, which would be the elected officials we have from the State and from the neighborhood boards, the people here who showed that they could deal with the traffic jams. And we're going to have to do the same for this.*

Response: Comment noted, no response required.

7. So here's my testimony. I used up a lot of time. Three minutes isn't much.

**Response:** Comment noted, no response required.

8. This will not take cars off the street. When the First Hawaiian Tower was built, 430 feet was a height exemption. People filled that building, right, and down at the bottom of the building are parking places. The parking places are filled with cars. Parking places are a commodity in Downtown. They are all filled with cars.

**Response:** Comment noted.

9. So you can have a wonderful mass transit system - and I don't care whether it's monorails or buses, whatever it is - those parking places are filled with cars. Those cars are going to be on the roads. When the new structure goes up on Nuuanu, it's going to have parking places in it. When the medical center comes up, phase one of that is - includes a 500-stall parking structure in Keolu, which is practically the same thing. That structure will be filled with cars. If some of them should be empty, then Diamond Parking, whoever it is, is going to lower the price a little. They will be filled, because that's the way it is in Honolulu. So this system will not reduce cars on the road.

**Response:** Comment noted.

10. And we have heard plenty of testimony. A lot of people apparently like riding the bus - riding the bus, whether it does you any good, it's just not going to reduce the number of cars on the road, even if you're on the bus. If you give up your parking place, somebody else will take it, because that's the way it is.

**Response:** Comment noted.

11. Castle & Cooke is dropping 30,000 homes in Central Oahu. Each of them is going to have a garage or a carport, and there's going to be a car there. And guess what, folks? They're going to shop at Costco. They're going to want to get into town. There's going to be - and unless the - the one way we can reduce congestion is to put the brakes on development. And this is something that our City Council has not been willing to even talk about.

**Response:** Comment noted. It is beyond the scope of the project to determine whether or not future development should be halted.

12. If there's one benefit to rapid transit, it's to bringing people into town efficiently - and I will summarize - that is to increase the productivity of labor.

**Response:** We concur that one rapid transit benefit is to transport people efficiently, which the Refined LPA (Bus Rapid Transit) will do.

13. It lets you bring into factories and office areas people who can't afford cars. It benefits business in that way.

**Response:** We concur that the Refined LPA will provide another transportation alternative to owning a car.

14. Unfortunately, Downtown Honolulu is not such a place. We don't have low-price factories and sweat shops and so forth, folks that generally benefit from the rapid transit, businesses that do benefit from rapid transit.

**Response:** Comment noted.

15. And yeah, I mean, the road rage is going to be outstanding. Sometimes it might even make me mad.

**Response:** Comment noted, no response required.

We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
630 SOUTH KING STREET, 3RD FLOOR  
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JEREMY HARRIS  
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CHERYL D. SOON  
DIRECTOR

GEORGE NEGOMI \* MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD002-00570

Mr. Matt Gilbertson  
1212 Nuuanu Avenue, Apt. 3111  
Honolulu, Hawaii 96817

Dear Mr. Gilbertson:

Subject: Primary Corridor Transportation Project

This is in response to your testimony at the October 28, 2000 Special Transportation Committee Meeting regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. I'm speaking on my own behalf here to testify in support of the Bus Rapid Transit Alternative as planned by the City and County, Department of Transportation.

**Response:** Comment noted. Thank you for supporting the project.

2. And I think Honolulu's current system is significantly underdeveloped. And for years has been under neglect. So, I would suggest that we cannot afford to be timid. We can't take tentative steps while other cities are taking more aggressive steps. Cause we are in a competitive market.

**Response:** The Refined LPA is the boldest of the three alternatives in terms of the quantity and quality of transit service offered.

3. But at the same time, as an architect, I also would stress that we cannot afford to do anything that will bight our community. Certain things have been said about doing elevated situations. And I could see no greater harm than we could do to our environment our pristine, beautiful surroundings than that which is our primary lifeline as Honolulu.

**Response:** The BRT Alternative is an at-grade system and does not include any elevated components.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

MAY 7 2002

2333 Kapiolani Blvd. #3410  
Honolulu, HI 96828

May 7, 2002

Ms. Cheryl Soon  
Director  
Department of Transportation Services  
City and County of Honolulu  
650 S. King Street, 3<sup>rd</sup> Floor  
Honolulu, HI 96813

Subject: Primary Corridor Transportation Project

Dear Ms. Soon:

Attached are my comments regarding the subject SDEIS for the BRT Project. These comments include a few points supplemental to the limited three-minute testimonies given at your hearing on April 20<sup>th</sup> and the City Council hearing on April 24<sup>th</sup> 2002.

Very truly yours,

Burt Goldenberg

2333 Kapiolani Blvd. #3410  
Honolulu, HI 96826

May 7, 2002

The following are my comments on the Supplemental Draft Environmental Impact Statement of March 2002 for the BRT Project.

My name is Burt Goldenberg - private citizen. I live at the Marco Polo Condominium on Kapiolani Boulevard at the intersection with Isenberg St. on the proposed BRT route.

I support implementing the portion of the TSM alternative west of middle St. as a first priority and deferring the in-town BRT portion until further impartial studies are done.

My reasons for this deferral are the following:

1. Current in-town Bus System is excellent - many City improvements and intense DTS management have resulted in a dependable and appreciated system. All it needs is fine-tuning and enlargement over time to suit growing demands. Most people at the Marco Polo who use the bus system are very pleased with City Express buses that shuttle them downtown very quickly and conveniently - Friends of ours from Arizona usually spend 3-4 months during the summer here in Honolulu and the first thing they do is stop on their way from the Airport to get their monthly bus passes. They never rent a car because they prefer using buses for sightseeing, shopping and anything else that suits their needs. They and other bus riders I talk to give Honolulu's bus system very high marks.

2. Taxes would be increased substantially - The City is now struggling with a budget dilemma for tax year 2003 - raise taxes or cut services. It is claimed that the entire BRT Plan would not result in increased taxes. But, this would not be the case if cost overruns were encountered at various stages of the program. Based on past City performance in terms of low-ball budget estimates and inadequate quality oversight of projects, we could be looking at overruns in the 20% to 100% range, especially if ridership forecasts are not met. Studies of many major transportation projects worldwide show overruns of up to 100% and higher - surely taxes would increase.

3. Traffic congestion/gridlock would worsen due to dedicated lanes - Current traffic in town is bad during morning and afternoon peak travel periods, further complicated by a lack of enough human (police) involvement at intersections and other key traffic spots to mitigate gridlock.

Surely, taking away lanes to be dedicated to BRT buses exclusively or in concert with other commercial people-carrying vehicles will snarl traffic in-town to a point where it could become as bad as trying to drive cross-town in New York.

4. Private Bus Transport Contractors - not part of the solution

It doesn't appear that private contractors have been designated to be involved contrary to statements made in community meetings that I attended that were held in the early stages of this project's development.

It would seem that they could augment the City's system in many ways in the hub and spoke system and be a buffer for unanticipated peak requirements. They could also provide competitive stimulation to the City's forces in providing proficient and efficient people transport.

Recommendations

A. Defer In-Town BRT, start on the TSM alternative west of middle St. instead,

Change City budget requests to reflect this change and the costs to accomplish item B noted below.

B. Do further studies using outside, impartial consultants to:

1. review current BRT plan as to viability and assumptions employed regarding bus routing and scheduling, community and business impacts, costs to implement, etc.
2. propose other possible alternative methods/systems and evaluate their suitability, effectiveness and overall costs.

Would suggest that a small taskforce be formed of UH, City, State and private citizens who have been actually involved in the transportation arena to participate in selection of at least two (2) impartial consultants to do the tasks noted above.

Also, to maintain utmost impartiality, it is recommended that the UH Engineering Department be appointed, or contracted if necessary, to supervise the Consultants subject to taskforce involvement. They would also facilitate contact with the City's Department of Transportation Services and their current consultant to provide data and information that has been so far generated and accumulated in preparation of the Trans 2K project and BRT proposal.

C. Run tests on some proposed exclusive lane streets to study impacts on traffic by running regular buses in coned lanes.

This should also be done involving the taskforce during the time that outside consultants would be performing their tasks.

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

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JEREMY HARRIS  
MAYOR

CHERYL D. SOOH  
DIRECTOR  
GEORGE "BOB" KEYSAULTO  
DEPUTY DIRECTOR

TPD5/02-01836R

November 13, 2002

Mr. Burt Goldenberg  
2333 Kapiolani Boulevard  
Apt. 3410  
Honolulu, Hawaii 96826

Dear Mr. Goldenberg:

Subject: Primary Corridor Transportation Project

This is a combined response to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS). We are responding in two parts. Part A responds to the oral testimony you gave at the October 5, 2000 and November 14, 2000 Special Transportation Committee Meetings. Part B responds to the oral testimony you gave at the Supplemental Draft Environmental Impact Statement (SDEIS) April 20, 2000 Public Hearing and your May 7, 2002 letter regarding the SDEIS.

Part A – MIS/DEIS Comments

1. *I realize that we're going to be affected, compounded more than a lot of people by having this dedicated lane right in front of our building. But I'm not as worried about that as I am about the fact that the problem for transportation here in Honolulu and on this island is the fact that just too many cars and there's nothing addressing how we're going to get them off the roads.*

Response: The Refined LPA will offer an option to motorists willing to leave their cars at home or to give up owning a car at all.

2. *And I think in time the in-town portion of whatever we're going to do will be decided and it will be an improvement.*

Response: Comment noted.

3. *But the problem is you got too many cars coming into Honolulu. Where are they parking? That's the problem. So how do we get rid of the cars?*

Response: See response to comment #1.

4. *I think the TSM system you mentioned the other night that would probably attract 46,000 more riders. And you assume that based on two people in a car that would get rid of 20,000 cars, roughly. Suppose they're all people who don't drive. Then we still got the same amount of cars on the road. And there's no guarantee that anything will get better by this in-town system and the highways.*

D. **Private Contract Transporters** should be incorporated into the general scheme possibly by reserving portions of the hub & spoke system for them and doing fill-in jobs to augment City forces during peak periods. I am hopeful that the DTS would meet with contractors as a group to foster their ideas and thoughts as to how they could benefit the City and themselves by their involvement in Bus System Operations.

E. **Traffic Monitors** should be trained for part-time involvement in their own neighborhood during peak morning and afternoon traffic flows to avoid or, at least, mitigate gridlock at intersections. I would think that people who are physically able and adept and have proper understanding of the tasks being proposed would be candidates to be trained. Presumably the Police Department could handle their training and then supervise them on a neighborhood basis. Enough could be trained so that they would do only a morning or afternoon stint to allow them a choice to fit their own schedule.

They should be trained as well to do the initial paperwork to enable police to issue warnings to owners whose cars violate gridlock rules.

This would help the people earn some money, would help traffic move better and it could be done now - it is needed now!



**Response:** In addition to attracting new passengers as a result of population growth, the TSM Alternative is forecast to attract 18,270 new riders per day in 2025. The Refined LPA is forecast to attract 51,440 new riders per day by 2025. With an average vehicle occupancy of 1.3 forecast for 2025 that would be a reduction of 14,050 auto trips with the TSM Alternative and 39,570 auto trips with the Refined LPA.

5. Let's make a toll road or something. Let's assign toll roads.

**Response:** There are no toll roads proposed in the Oahu Regional Transportation Plan.

6. Get rid of parking. It takes strong politicians to face the fact that you're going to tell people that you can't allow any more parking and we're going to take away some right now. At the University there, I think the other night someone mentioned that they're going to put a new parking structure in addition to the one they've got. Well, that allows people to use cars on the roads. So the solution, as I see it, is to get rid of the parking and that means take away what you already have and don't get any more. You gotta change laws about building new buildings where you have to have parking in there. Why? So, I think we have to address that problem.

**Response:** In addition to trying to attract motorists to transit by providing service near their homes, the Refined LPA proposes to build park-and-ride facilities in outlying locations to reduce the need for commuters to have to drive all the way into town. These outlying parking facilities would reduce the number of autos circulating in-town as well as reduce the number of parking spaces needed in-town.

7. And I think toll road application, getting rid of parking are the answers.

**Response:** Comment noted.

8. We talked about this the other, I think it was a week ago. About using King Street as a main artery. Because I think right now it's a dangerous street to even walk across. And I think having a one dedicated bus lane or two in the center would make a lot of people to cross the street properly would be a big help. I think six lanes in there right now... There are places where it goes down to five and four. But there's plenty of room on King Street to go all the way from the center of town out to the University. I think it would allow more people to use it.

**Response:** South King Street is being used as the In-Town BRT alignment from downtown to Pensacola Street.

9. Support the TSM Alternative as the Locally Preferred Alternative.

**Response:** Comment noted.

Part B - SDEIS Comments

10. I live at the Marco Polo on Kapolei, so we have a lot of traffic on our street. I think everything should be deferred. We should take a breather, and get someone else in terms of consultants with some fresh ideas, additional to what's already been put together, and come up with a solution for the in-town portion of the system. I think starting out at the outlying portions is the right way to go. But I have reasons for this deferral.

**Response:** Comment noted.

11. First of all, cost. I think the City Council is struggling with the budget that we are - that has been put forth so far, and it's either raise taxes or cut services.

**Response:** Comment noted. Chapter 6 of the FEIS presents the project's financial plan. It indicates that raising taxes and/or cutting services will not be required as a result of the project.

12. And according to this plan, there will be no increased taxes.

**Response:** That is correct. This project has been developed following City Council policy to not increase taxes. The financial analysis (Chapter 6 of the FEIS) shows that no increases in existing taxes or new taxes will be required to fund the project as proposed.

13. If you look at the past record of the City executing big projects, sizable projects, the police station, they added \$70 million last year to the budget that had already been approved for things that they forgot.

**Response:** Comment noted.

14. The track record has been they low-ball the estimates for the budgeting, and they have not had the oversight to really run the projects properly. I don't know what they've done in the meantime to improve that situation. But I would think that the overruns probably would run anywhere from twenty to a hundred percent over what we're being - seeing right now. So I don't know whether there's going to be an increase in taxes to take care of that. Or do we pull out the credit card again?

**Response:** Comment noted.

15. I think - the second reason for my holding off on this is that the current system is great. I hear this from everybody who uses the bus. We have friends who come in yearly, who spend the summer months here in Honolulu, and the first thing they want to do when they get in is go and get their monthly bus pass. They go every place by bus. The system is great. I think it is to the credit of Cheryl Soon and everything she's done. I've said that in the past.

**Response:** Thank you for your support of the current public transit system.

16. But I think that the system we have is great. It can be fine-tuned and enlarged to meet demands, and I think that ought to be the urgency right now.

**Response:** Comment noted.

17. The traffic and the gridlock that we're getting, I think - one of the things I find - and this rapid transit and the exclusive lanes is going to create a problem. But I don't see police at the intersections which seem to get tied up with the people getting caught before they get past the intersection and blocks lanes of movement. And I think that's one of the biggest problems we have with the current system.

**Response:** Rigorous enforcement will be important to keeping traffic flowing in the future.

18. Then, too, in this SDEIS, I haven't seen anything as far as private contractors transporters being a part of the component of the system. And I think that that's something that has to be - oh, boy.

**Response:** Private buses will be able to use the priority lanes in Waikiki.

19. Anyway, I think we ought to bring in some consultants who have got some fresh ideas and let them work with the citizens panel, U.H., people to look at any other possible alternative systems for putting those in place. And there's not enough time so.

**Response:** Comment noted.

20. I support implementing the portion of the TSM alternative west of Middle St. as a first priority and deferring the In-Town BRT portion until further impact studies are done.

**Response:** Thank you for taking the time to review the SDEIS and for submitting a letter expressing your preferences regarding alternatives.

21. Current In-Town Bus System is excellent - many City improvements and intense DTS management have resulted in a dependable and appreciated system. All it needs is fine-tuning and enlargement over time to suit growing demands. Most people at the Marco Polo who use the bus system are very pleased with City Express buses that shuttle them downtown very quickly and conveniently - Friends of ours from Arizona usually spend 3-4 months during the summer here in Honolulu and the first thing they do is stop on their way from the Airport to get their monthly bus passes. They never rent a car because they prefer using buses for sightseeing, shopping and anything else that suits their needs. They and other bus riders I talk to give Honolulu's bus system very high marks.

**Response:** Thank you for your support of the current public transit system.

22. Taxes would be increased substantially. The City is now struggling with a budget dilemma for tax year 2003 - raise taxes or cut services. It is claimed that the entire BRT Plan would not result in increased taxes. But this would not be the case if cost overruns were encountered at various stages of the program. Based on past City performance in terms of low-ball budget estimates and inadequate quality oversight of projects, we could be looking at overruns in the 20% to 100% range, especially if ridership forecasts are not met. Studies of many major transportation projects worldwide show overruns of up to 100% and higher - surely taxes would increase.

**Response:** There is no evidence to support the claims. Recent major transit projects in Salt Lake City, San Diego, Dallas, Portland and elsewhere have been built within or under the construction cost estimates.

23. Traffic congestion/lockdown would worsen due to dedicated lanes - Current traffic in town is bad during morning and afternoon peak travel periods, further complicated by a lack of enough human (police) involvement at intersections and other key traffic spots to mitigate gridlock.

**Response:** Rigorous enforcement will be important to keep traffic flowing in the future.

24. Surely, taking away lanes to be dedicated to BRT buses exclusively or in concert with other commercial people-carrying vehicles will snarl traffic in-town to a point where it could become as bad as trying to drive cross-town in New York.

**Response:** It is not the conversion of lanes that will create the congestion. The congestion for motorists will be there without the BRT. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

25. Private Bus Transport Contractors - not part of the solution - It doesn't appear that private contractors have been designated to be involved contrary to statements made in community meetings that I attended that were held in the early stages of this project's development.

**Response:** Several tour bus operators were invited to attend the working group meetings and some attended those meetings and some chose not to attend.

26. It would seem that they could augment the City's system in many ways in the hub and spoke system and be a buffer for unanticipated peak requirements. They could also provide competitive stimulation to the City's forces in providing proficient and efficient people transport.

**Response:** Consideration will be given to contracting with private passenger carriers for portions of the hub-and-spoke system.

27. Defer In-Town BRT, start on the TSM alternative west of Middle St. instead. - Change City budget requests to reflect this change and the costs to accomplish item B noted below.

**Response:** There is no reason to defer implementation of the In-Town BRT as has been approved by the City Council.

28. Do further studies using outside, impartial consultants to:

1) review current BRT plan as to viability and assumptions employed regarding bus routing and scheduling, community and business impacts, costs to implement, etc.

**Response:** The Primary Corridor Transportation Project was initiated in September 1998 with gathering public input to create and refine the Islandwide Mobility Concept Plan. Numerous outside consultants have assisted the city in preparing the analyses, EIS and engineering for the project. The DEIS, SDEIS, and FEIS summarize the assumptions, impacts, benefits, and costs associated with the BRT Alternative.

29. propose other possible alternative methods/systems and evaluate their suitability, effectiveness and overall costs.

**Response:** Other alternatives have been considered and rejected in favor of the Refined LPA.

30. Would suggest that a small taskforce be formed of UH, City, State and private citizens who have been actually involved in the transportation arena to participate in selection of at least two (2) impartial consultants to do the tasks noted above.

**Response:** Numerous outside consultants have assisted the City in conducting extensive analyses to date. Additional study is unwarranted.

Mr. Burt Goldenberg  
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November 13, 2002

Mr. Burt Goldenberg  
Page 7  
November 13, 2002

31. Also, to maintain utmost impartiality, it is recommended that the UH Engineering Department be appointed, or contracted if necessary, to supervise the Consultants subject to taskforce involvement. They would also facilitate contact with the City's Department of Transportation Services and their current consultant to provide data and information that has been so far generated and accumulated in preparation of the Trans 2K project and the BRT proposal.

Response: See response to comment #30.

32. Run tests on some proposed exclusive lane streets to study impacts on traffic by running regular buses in coned lanes. This should also be done involving the taskforce during the time that outside consultants would be performing their tasks.

Response: A test of closing a lane is not a test of what will happen with the BRT, it is only a test of what happens when a lane is closed which is something everyone knows from when lanes are temporarily closed during utility construction.

As is pointed out in Chapter 4 of the FEIS, over time there will be more than enough people diverted from autos to transit to offset the impact of converting lanes for priority use by buses. This diversion from autos will only happen once it is clear that the BRT installation is a permanent improvement, not part of some test.

What is proposed with the first branch between Iwail and Weikuid will be a good test of the ability of BRT to attract new riders and the impacts of converting lanes in selected locations.

33. Private Contract Transporters should be incorporated into the general scheme possibly by reserving portions of the hub & spoke system for them and doing fill-in jobs to augment City forces during peak periods. I am hopeful that the DTS would meet with contractors as a group to foster their ideas and thoughts as to how they could benefit the City and themselves by their involvement in Bus System Operations.

Response: Consideration will be given to contracting with private passenger carriers for portions of the hub-and-spoke system.

34. Traffic Monitors should be trained for part-time involvement in their own neighborhood during peak morning and afternoon traffic flows to avoid or, at least, mitigate gridlock at intersections. I would think that people who are physically able and adept and have proper understanding of the tasks being proposed would be candidates to be trained. Presumably the Police Department could handle their training and then supervise them on a neighborhood basis. Enough could be trained so that they would do only a morning or afternoon stint to allow them a choice to fit their own schedule.

They should be trained as well to do the initial paperwork to enable police to issue warnings to owners whose cars violate gridlock rules.

This would help the people earn some money, would help traffic move better and it could be done now - it is needed now!

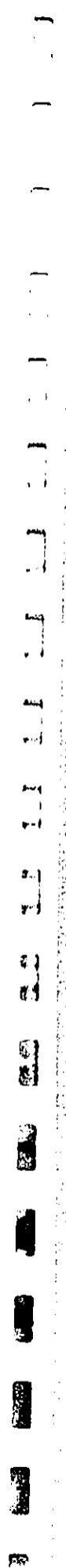
Response: Thank you for this suggestion.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Myamoto at 527-6876. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director



RECEIVED  
Oct 24 4 36 PM '00  
CITY CLERK  
HONOLULU, HAWAII

October 24, 2000

Mr. Jon Yoshimura, Chair  
Honolulu City Council  
530 So. King Street  
Honolulu, HI 96813

Subject: Oahu Trans 2K Progress Report

Dear Sir:

I have reviewed the subject report and have concluded that the Bus Rapid Transit (BRT) would be the most effective way to ease the traffic burden Honolulu is experiencing. Other means would require the use of unsightly viaducts or would take developed property to widen roads.

The final selection of the equipment for this plan is contingent on what appears best-suited at the time that it is necessary to place an order. It is understood that great strides are being made in combination electrical-internal combustion powered units.

I understand that elements of the "hub and spoke" network are currently being phased into the existing bus system. This is a step forward. Thanks for that activity.

I believe the public is keenly interested in the progress being made to upgrade the capacity and service of the bus system, and these changes might lead to the easing of the ever-growing flow of vehicular traffic.

Thank you for allowing me to testify.

*Frederick C. Gross*  
Frederick C. Gross

1434 Punahou Street, Apt. #837  
Honolulu, HI 96822

VIA FAX

01285

Fisc. Com. No. \_\_\_\_\_

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Thank you for allowing me to testify.

*Frederick C. Gross*  
Frederick C. Gross

1434 Punahou Street, Apt. #837  
Honolulu, HI 96822

VIA FAX

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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE YECOU MEYAMOTO  
DEPUTY DIRECTOR

TPD4/02-01609R

November 13, 2002

Mr. Frederick C. Gross  
1434 Punahou Street, Apt. #837  
Honolulu, Hawaii 96822

Dear Mr. Gross:

Subject: Primary Corridor Transportation Project

This is a combined response to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your October 24, 2000 letter regarding the MIS/DEIS and Part B responds to the comments you made at the SDEIS April 20, 2002 Public Hearing and April 22, 2002 letter regarding the SDEIS.

Part A – MIS/DEIS Comment

1. *I have reviewed the subject report and have concluded that the Bus Rapid Transit (BRT) would be the most effective way to ease the traffic burden Honolulu is experiencing. Other means would require the use of unsightly viaducts or would take developed property to widen roads.*

Response: Thank you for supporting the project.

Part B – SDEIS Comments.

2. *I am not speaking against the BRT. I've followed the design and the discussion of it since its inception. I have lived here for over six years, and I've seen a vast change in Honolulu. I've seen a vast change in the last five years as far as traffic is concerned on the H-1 and H-2.*

Response: Comment noted, no response required.

3. *There's several things about the DEIS that I'm concerned about. It starts off in the executive session talking about the steel plate being used. I hope that you – I would like to hear it expressed here and now that you are not going to use that system until it's improved or proved itself.*

Mr. Frederick C. Gross  
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Response: A decision on the long-term technology will be made in 2008. By then embedded plate technology will have sufficient experience in revenue service elsewhere to determine whether it is the best technology for Honolulu.

4. *One of the things that I think can be a problem is once – is providing parking for people that will no longer be allowed to park on the streets. You're not going to take all the cars that are being used currently off the streets, and you're going to have to provide parking before you start working on the streets. Otherwise, you're going to have a pretty unhappy populace, and I think they'll require that you do something possibly not to your best advantage.*

Response: DTS is aware that the proposed elimination of on-street parking spaces is of concern to many people. As discussed in Section 4.3, in areas where a large concentration of parking spaces would be affected, replacement parking in new off-street parking facilities will be considered, but only if they meet other livable community objectives and are the result of community-based planning.

5. *I'd like to see also a plan at some time where the various routes are tried with buses to make sure they work. Because, initially, there was a system – a route was suggested where a road didn't exist, and you couldn't do it because there was a building there. I think we can do better than that.*

Response: The initial technology will be hybrid-electric buses that can be re-routed if there are any difficulties with the selected alignment.

6. *As I said, I am not contrary to BRT. We have to do something. But I hope that we do it properly and we do it fairly soon.*

Response: Comment noted, no response required.

7. Executive Summary – Page S-1, paragraph 5, states: "The in-town BRT system would use an embedded plate system or hybrid electric propulsion."

Response: I am not aware of a selection of the system to be used. Has the system used in Naples or Trieste, Italy, proven satisfactory? (See your release Oahu Trans 2K, Islandwide Mobility Concept Plan report dated August, 2001.) Wet steel plates may prove slippery. The comment on Page 26 re minimal chances of being electrocuted is noted. Has either system proved itself?

Response: See response to comment #3.

8. *In the subject report, Executive Summary, Page 8, paragraph 11 regarding parking, and in many other places in the SDEIS, the need to remove on-street parking is discussed. Nowhere did I find more than a brief statement about additional off-street parking for those displaced from the street. It is going to be necessary to have ample new parking available if it is expected that drivers will park and ride the public transportation.*

Mr. Frederick C. Gross  
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November 13, 2002

**Response:** Whether to provide additional off-street parking to mitigate lost on-street parking is a policy decision to be determined. As discussed in Section 4.3, in areas where a large concentration of parking spaces would be affected, replacement parking in new off-street parking facilities would be considered, but only if they meet other livable community objectives and are the result of community-based planning. Parking facilities for proposed Park-and-Rides are a separate matter, and parking at those facilities will be provided, also as discussed in Section 4.3.

9. *Are we certain that the vehicles for all the various routes can be accommodated on the streets or routes for which they are intended?*

**Response:** See response to comment #5.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

*TO: Ms. Cheryl D. Soon, Deputy Transportation*

CITY & COUNTY OF HONOLULU, CITY COUNCIL CHAIR AND MEMBERS: My name is Raymond A. Gruntz, of 1765 AlaMoana Apt. 1482 Honolulu, HI 96815, tel. #949-0492. I am a Retired NYCPD Detective, Honolulu is my new home these past 5 years. I JOSE THE BRT IN ANY SHAPE, WAY OR FORM. Our island traffic at this time is in GRIDLOCK now during rush hour. If you take away two lanes of existing road way the BRT would be operating on, IT WILL BRING MASSIVE GRIDLOCK CONDITIONS THAT HAS NOT BEEN SEEN ANYWHERE, NOT EVEN NYC. I am concerned that even POLICE, FIRE, AND EMS, people will not be able to respond to EMERGENCYS on our island. Even with a control switch THAT EXTENDS THE GREEN LIGHT or change red to green as FIRE TRUCKS HAVE NOW, in GRID LOCK, nothing moves, not to mention that when the BRT BUSES back up as the buses do now, keeping the traffic light green for them will cause CROSS TRAFFIC to also back up making things even worse. ITS A LOSE LOSE PROJECT AND TO TOP IT OFF OUR STATE, CITY & COUNTY HAS BIG TIME BUDGET PROBLEMS. WE CANT AFFORD THIS (ONE BILLION DOLLAR TOY). WHEN IT FALLS AND IT WILL, WITHOUT A SHADOW OF A DOUGH, YOU CAN PARK YOUR BULLET BUSES IN THE CONVENTION CENTER. WHY NOT LEAVE IT TO THE NEW COUNCIL AFTER THE ELECTION COME NOVEMBER THIS YEAR. THIS PLACE IS OVER TAXED AND OVER SPENDS, AND TIME AND TIME AGAIN MAKES MISTAKES THAT COSTS US TAXPAYERS MILLIONS, TRAFFIC CAMS, MAINTAINING OUR PUBLIC POOLS, AND EVA VILLAGE. ( TO NAME A FEW. (LETS STOP WASTING MONEY), LIKE WE SAY IN NY, " FOR GET ABOUT IT". SO PLEASE KILL THE BRT. NO RIGHT THINKING PERSON WANTS IT, LISTEN TO THE PEOPLE. HOW MANY PEOPLE IN THIS CONVENTION CENTER DO YOU THINK HAS ANYTHING GOOD TO SAY ABOUT THE BRT. NOW THAT THEY KNOW WHAT IT WILL CAUSE ON THIS ISLAND. ITS NOT YOUR MONEY, ITS OURS, AND WE DONT WANT YOU TO SPEND IT ON THE BRT. WHEN I WAS A NEW RESIDENT HEAR IN HONOLULU, I SAW ON CABLE, THE STATE AND CITY, HEARINGS BEING ARED TO THE PUBLIC, I SAW THE LOCAL BOARDS CONDUCTING THERE MEETINGS, THE GOVERNOR, MAYOR AND YOU THE COUNCIL AT VARIOUS EVENTS THINKING WOW, OUR ELECTED OFFICIALS ARE IN THE STREETS WITH THE PEOPLE, I GOT POT HOLDERS IN THE MAL, I SAID WHOS THIS DUKE SENDING ME POT HOLDERS. I LEARNED THAT FOR THE MOST PART GOING TO THE HEARINGS AND SPEAKING ON VARIOUS SUBJECTS IT DID NOT MATTER I WAS TOLD THANK YOU, OR THANK YOU FOR YOUR TESTIMONY, AND VARIOUS COMMITTEES HAD THERE OWN AGENDA, OR WOULD RECESS AND PEOPLE WOULD GET TIRED, GO TO WORK, OR JUST GO HOME. THEN THE HEARING WOULD RECOMVENE AND VOTE THE WAY THE MACHINE WANTED. THIS HAS BEEN THE CASE AT THE STATE CAPITAL AS WELL AS AT THE COUNCIL. JUST LOOK OUT AT THE VOTERS SEATED BEFORE YOU MOST OF THEM ARE OPPOSED TO THIS PROJECT. WE WILL BE AT THE COUNCIL THE 24 OF APRIL 2002, IF YOU DONT KILL THIS PROJECT TODAY. WE HAVE BEEN INFORMED THAT THE START UP FUNDS FOR THE BRT ARE TO BE VOTED ON THAT DATE, TO GET IT STARTED. I WILL BE REQUESTING OUR NEW FEDERAL PROSECUTOR TO FOLLOW THE MONEY, BOTTOM LINE THIS STATE & CITY NEEDS A MAJOR INVESTIGATION INTO ITS FUNDING AND GOOD OLD BOY CONTRACTS. I DO WANT THIS OPPOSING TESTIMONY TO BE INCLUDED IN THE FINAL EIS REPORTING. THANK YOU FOR YOUR TIME.

APR 20 2002

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

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JEREMY HARRIS  
MAYOR

CHERYL D. SOOK  
DIRECTOR  
GEORGE REEDS  
DEPUTY DIRECTOR

TPD02-00571

November 13, 2002

Mr. Raymond A. Gruntz  
2350 Kūhio Avenue, #2402  
Honolulu, Hawaii 96815

Dear Mr. Gruntz:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, 2002 public hearing and your April 22, 2002 letter regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. I oppose the BRT in any shape, way or form.

**Response:** Thank you for expressing your preference regarding the alternatives considered and analyzed.

2. Our island traffic at this time is in gridlock now during rush hour. If you take away two lanes of existing road way the BRT would be operating on, it will bring massive gridlock conditions that has not been seen anywhere, not even NYC.

**Response:** It is not the conversion of lanes that will create the congestion, the congestion for motorists will be there with or without the BRT. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

3. I am concerned that even police, fire, and EMS people will not be able to respond to emergencies on our island. Even with a control switch that extends the green light or change red to green as fire trucks have now, in gridlock, nothing moves, not to mention that when the BRT buses back up as the buses do now, keeping the traffic light green for them will cause cross traffic to also back up making things even worse.

**Response:** Emergency vehicles will be able to use the BRT lanes to go around back-ups when they need to.

4. It's a lose lose project and to top it off our state, city & county has big time budget problems, we can't afford this (one billion dollar toy).

**Response:** The MIS/DEIS, SDEIS, and FEIS Chapter 6 and Appendix E present the financial analysis and cash flow tables, respectively. The analysis shows that by phasing the project over time, the Refined LPA can be implemented without raising taxes.

Mr. Raymond A. Gruntz  
Page 2  
November 13, 2002

5. When it fails and it will, without a shadow of a doubt, you can park your bullet buses in the convention center. Why not leave it to the new council after the election comes November this year.

**Response:** Comment noted.

6. This place is over taxed and over spends, and time and time again makes mistakes that costs us taxpayers millions, traffic jams, maintaining our public pools, and Eya Village (to name a few.)

**Response:** Comment noted.

7. Let's stop wasting money like we say in MY, "For Get About It." So please kill the BRT, no right thinking person wants it, listen to the people, how many people in this convention center do you think has anything good to say about the BRT, now that they know what it will cause on this island.

**Response:** Comment noted.

8. It's not your money, it's ours, and we don't want you to spend it on the BRT.

**Response:** Comment noted.

9. When I was a new resident here in Honolulu, I saw on cable, the state and city, hearings being aired to the public. I saw the local boards conducting their meetings, the governor, mayor and you the council at various events thinking wow, our elected officials are in the streets with the people, I got pot holders in the mail, I said who's this Duke sending me pot holders. I learned that for the most part going to the hearings and speaking on various subjects it did not matter I was told thank you, or thank you for your testimony, and various committees had their own agenda, or would recess and people would get tired, go to work, or just go home. Then the hearing would reconvene and vote the way the machine wanted. This has been the case at the state capital as well as at the council. Just look out at the voter's seated before you most of whom are opposed to this project. We will be at the council the 24 of April 2002, if you don't kill this bill today.

**Response:** Comment noted.

10. We have been informed that the start up funds for the BRT are to be voted on that date, to get it started. I will be requesting our new federal prosecutor to follow the money, bottom line this state & city needs a major investigation into its funding and good old boy contracts.

**Response:** Comment noted.

11. I do want the opposing testimony to be included in the final EIS reporting. Thank you for your time.

**Response:** The FEIS includes all the MIS/DEIS and SDEIS comments and responses.

12. I'm a new resident of Honolulu, retired New York City detective. In my other life, I used to have a little joke. You, by conducting this proceedings today, as required by law, when I was enforcing the law, I was required to give the people their legal rights when placed under arrest. First legal right was, "You've got the right to remain silent." I would jokingly at times say, "as long as you can stand the pain."

Mr. Raymond A. Gruntz  
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November 13, 2002

*The people of Honolulu have not experienced pain, but they will if this BRT goes forward. You want to talk gridlock, we've got gridlock in New York City, my former home. Now that Honolulu is my new home, I'd hate like heck to see it happen here.*

**Response:** Comment noted. Without the BRT, congestion in Honolulu will get worse in 2025. The MISDEIS, SDEIS, and FEIS Chapter 4 present the traffic and transportation impacts associated with the project.

13. *People will not get out of their cars. The U.S. runs on cars. Without the car business, our economy would be in shambles. People on wheels have put this country together. Then came the railroad. And poor horses, now all they could do now is make fertilizer.*

**Response:** We concur that the automobile plays an important role in the economy; however, the BRT will give people an alternative to using their automobiles.

14. *I did submit my testimony in writing to the people outside at the desk. Since I don't see anyone here handing in their testimonials here this morning. Maybe they don't know what to do with it.*

**Response:** Comment noted. People testifying at the April 20, 2002 public hearing could submit their written comments and/or testimonials at the public hearing or mail them to the DTS by May 7, 2002.

15. *Hell no, we won't get out of our cars. But the BRT, as the buses do now, when they come into the bumper to bumper situation coming into town, they will have this magic button that will prolong the use of the green signal in the bus's favor.*

**Response:** The potential to extend the green phase will only be implemented at locations where it will not significantly affect cross street traffic.

16. *What's going to happen with all the side street traffic? You're going to have gridlocks coming left, right, all around town.*

**Response:** The potential for the BRT vehicles to extend the green phase will only be implemented at locations where it will not significantly impact cross street traffic.

17. *Hundred billion - one billion dollars, that's a lot of money. I'm living here on a pension. I put my name and address on a lot of forms outside, so I will be expecting a state income tax audit this year. I guess a lot of other people will, too. But with my pension, lucky enough, it's tax-free in this state. That's one of the reasons I moved.*

**Response:** Comment noted.

18. *I'm a Costco customer. I can't get on the bus with my Costco goods. I visited Sam's Club. They won't be able to do it anyway. Walmart, same thing. You can't take your dog on the bus if it's too large for an animal carrier.*

**Response:** There is no City ordinance precluding people from riding the public transit system with purchases from Costco, Sam's Club, Walgreens, Walmart, etc. The only caveat is that the person must be able to hold their carry-on items in their laps.

Mr. Raymond A. Gruntz  
Page 4  
November 13, 2002

19. *So we have an emergency - police, fire, and emergency vehicles responding to emergencies. Back in New York, when I had the police car, a light, and a siren, at times we went up on the sidewalk to get around gridlock conditions, rushing to a job. I don't hear input from HPD, the fire department or EMS, or doctors having to respond to a hospital to give birth - or assist in giving birth. I still see that now - said enough.*

**Response:** During emergencies, emergency vehicles will be able to take use the BRT priority lanes to go around back-ups.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director



DEPARTMENT OF TRANSPORTATION SERVICES  
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TPD02-00572

November 13, 2002

Mr. Jim Hall  
Page 2  
November 13, 2002

4. *The most expensive system is the system that doesn't work. Even in this paper here you mentioned that a fully grade-separated system, either an elevated guideway or underground subway would provide fast, high-capacity, reliable service. That's how you get people out of their cars. When it is fast, high-capacity and reliable.*

**Response:** The Refined LPA provides a fast, high-capacity, reliable system.

Part B - SDEIS Comments

5. *We have three minutes. And the last time I was here, we only had one minute. I was thinking, What could I say in one minute? And said, "Well, the most expensive transportation plan in the world is the one that doesn't work. And this one won't work." So that was my one-minute speech.*

**Response:** Comment noted.

6. *But the other two minutes, I wanted to say I do have some background in this. I worked for the previous mayor. And as an executive assistant, one of the departments I worked with was the Department of Transportation, and we had a task force to look at traffic problems in Waikiki. And I had a proposal that we take all the City buses off of Kalakaua and put them all on Kuhio, and then allow the private buses to use the City bus stops along Kalakaua, and that was accepted, and that's what it is today. So I do have some background in this issue.*

**Response:** Comment noted.

7. *Now, while I was working on that project, the mayor asked me to come up with some statistics on what's going to happen in the future. And we did the same thing for this project. I took the number of miles of streets and highways taken - on Oahu in 1975 and the number of registered motor vehicles on Oahu in 1975, and came up with a thing I called "Motor Vehicles Per Mile Street or Highway, Oahu." In 1975, it was 302.7 motor vehicles registered per street or highway mile. And today, that figure is now 410.1. And by the year 2025, if you just stay on the streets, you're going to have 538 motor vehicles per mile street or highway. And I extrapolated using the rate that motor vehicles are going up and the rate the mile streets went up. In 1975, for example, there were 1,094 street miles. In 2000, it was up to 1,500. And in 2025, it should be about 1900. So what we have is the situation in 2025, if we stay on the road and we don't do offgrade for mass transit, we will have more cars than there are feet of road. And that's not a very good situation.*

**Response:** That is why the high capacity mass transit system proposed in the Refined LPA is needed.

8. *So what I'm saying is, what the main fault of this plan is they didn't even consider any offgrade type of transportation. And it was like there's the only thing we got to do is the BRT. Well, there's plenty of systems around the world that could be done here and could be - look fine.*

**Response:** A grade separated system was rejected at the outset by the public and City Council as being too costly and unsightly.

9. *I have a information sheet here from the Futrix Corporation System 21. And they are constructing a monobeam system in Charleston, South Carolina, in which only - the base is only six feet across, and it then carries a capacity system in both directions.*

**Response:** Selection of a Locally Preferred Alternative has already been made.

Subject: Primary Corridor Transportation Project

This is a combined response to your comment on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to the oral comments you made regarding the MIS/DEIS at October 5, 2000 Special Transportation Committee Meeting. Part B responds to the oral comments you made at the SDEIS April 20, 2002 Public Hearing.

Part A - MIS/DEIS Comments

1. *And excluding the people who live in Waikiki, how many here arrived tonight by our present system, TheBus.*

**Response:** Comment noted. The comment is addressing the attendees of the Transportation Committee Meeting.

2. *Now, my second point is the bottom line. The bottom line is the most expensive system in the world is the system that doesn't work. And I'm not so sure that this system is going to work very well. We're talking about a lot of money over 25 years. Already, if you put every car in Honolulu on the street now, then we'd be total gridlock entire island. You've got to have all kinds of things to think about.*

**Response:** Since congestion is forecast to get worse in the future without the BRT, the purpose of the BRT is to allow those who are willing to use transit to bypass the congestion where it is possible to give priority to transit vehicles. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

3. *I'm sorry that you excluded, because it's controversial, things like separate grade. I think before any final decision is made, it should be reconsidered.*

**Response:** A grade-separated system was proposed in the past and was rejected as too expensive and/or too damaging to the environment. The public and City Council indicated at the outset of the Primary Corridor Transportation Project that a grade-separated system is still not acceptable.

Mr. Jim Hall  
Page 3  
November 13, 2002

10. Well, anyway, I just want to say that I think that - one last thing - this is important. That the State Legislature yesterday passed a resolution that states a current resolution, asking the Governor to appoint a task force to look into having a light rail system instead of this. And so this project does not have the support of State Legislature, and I thought you might want to know that.

Responses: House Concurrent Resolution (HCR) No. 112, and its companion measure, Senate Concurrent Resolution (SCR) No. 142 were both initiated by House Transportation Vice-Chairman Rep. Willie Esparo of Ewa Beach. The resolutions request the Governor to convene a task force to reassess the feasibility of establishing a light rail system to alleviate the increased traffic problems on Oahu, review the plans and work already completed as a base of information to avoid duplication of effort, and assess the need for a light rail system. Identify available resources for planning and construction, including federal funds, and consider new designs and systems. The resolutions do not refer to BRT in any of the text, and neither support or oppose a BRT project. Both resolutions passed this legislative session.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6876. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE NEONI MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00573

November 13, 2002

Mr. Keith Hamada  
Leeward Oahu Transportation  
Management Association  
700 Bishop Street, Suite 1928  
Honolulu, Hawaii 96813

Dear Mr. Hamada:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. *I'm testifying in support of BRT, representing Leeward Oahu Transportation Management Association.*

Response: Thank you for attending the April 20, 2002 public hearing and for supporting the project.

2. *The BRT was born out of the Trans 2K process that consisted of over 100 public meetings and thousands of citizens. Those citizens acknowledged that we have a traffic problem and look to task to find a solution. The BRT is that solution. To put it simply, we feel that the BRT will increase mobility and improve transportation options for the island of Oahu.*

Response: We concur. The community involvement process for the project has been extensive.

We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

975102-1904

May 7, 2002

Primary Corridor Transportation Project SDEIS  
Comments of J. Thomas Heinrich

TO: Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City & County of Honolulu  
650 South King Street, 3rd Floor  
Honolulu, Hawaii 96813

Ms. Genevieve Salmonson, Director  
Office of Environmental Quality Control  
State of Hawaii  
235 South Beretania Street, Suite 702  
Honolulu, Hawaii 96813

FROM: J. Thomas Heinrich ✓ JTH  
Attorney at Law  
2426 Armstrong Street  
Honolulu, Hawaii 96822-1932

RECEIVED  
02 MAY 9 9 3: 39  
DIRECTOR'S OFFICE  
DEPARTMENT OF  
TRANSPORTATION SERVICES

DATE: May 7, 2002  
RE: Comments Concerning the Primary Corridor Transportation Project Supplemental Draft Environmental Impact Statement (March 2002)

*Aloha!* I offer these comments in my individual capacity only and not as Chair of the Manoa Neighborhood Board No. 7, as the Board has not taken any official action concerning (1) the Primary Corridor Transportation Project, (2) Bus Rapid Transit (BRT) as the "Locally Preferred Alternative" (LPA), or (3) the Supplemental Draft Environmental Impact Statement (SDEIS).

While this discussion is offered in my individual capacity only, the following information and evaluations are based in part on my service as: (1) Chair of the Manoa Neighborhood Board No. 7 from June 1999 to the present; (2) a participant in the Oahu Trans 2K program; (3) a participant in various traffic calming working groups; (4) a participant in the Mid-Town/University Working Group for the Primary Corridor Transportation Project; (5) a participant and leader of Vision Team 10: Makiki-McCully-Mo'ili'i-Manoa, part of the City & County of Honolulu's Community Visioning Program; (6) a charter member of the Ala Wai Watershed Association Board of Directors from 1999 to the present; (7) a charter member of the community organization Malama o Manoa Board of Directors from 1992-2000; (8) a member of the non-voting Malama o Manoa Board of Advisors from 2001 to the present; (9) Chair of the Malama o Manoa Planning Committee from 1998 to the present; and (10) a participant in the University of Hawaii Strategic Planning initiative.

Personal Support for BRT. I support the Refined Bus Rapid Transit Alternative as set forth in the SDEIS, especially as compared to the No-Build Alternative and Transportation System Management Alternative.

I recognize and appreciate the contributions of the 5 Working Groups in proposing BRT adjustments, especially as I was a participant in the Mid-Town/University Working Group which recommended one of the major refinements addressed in the SDEIS (rerouting a short section of the University of Hawaii-Manoa (UH-Manoa) In-Town BRT alignment from Ward Avenue to Pensacola Street).

Recommendation 1. However, recognizing that "the devil will be in the details" and refinement of the BRT alternative must continue as the planning and implementation phases progress, I strongly recommend that the planning consultants together with representatives from the respective neighborhood areas literally walk each segment of the proposed branch alignments in order to (1) verify the accuracy and details of the

existing conditions and proposed project elements as represented in the preliminary drawings included in the SDEIS, and (2) gather specific "local knowledge" concerning the actual traffic, parking, and driver behavior conditions along the proposed branch routes, and suggestions for refinements at specific locations along the same.

As an example, in order to address questions raised by the McCully/Mo'ili'i Neighborhood Board No. 8 concerning apparent inconsistencies between representations made in presentations to the Board and what appears in the SDEIS regarding the loss or relocation of trees, removal of on-street parking stalls, and other adjustments, 3 members of the Mid-Town/University Working Group and/or McCully/Mo'ili'i Neighborhood Board No. 8 met with 3 of the project consultants on Thursday morning April 18, 2002 to walk the length of University Avenue for the purposes of evaluating (1) existing conditions; (2) traffic patterns; (3) intersection movements; (4) impacts on trees and on-street parking; and (5) the relationship of the BRT proposal to other coincidental, contemporaneous planning and development activities in the area, which offer opportunities for public and private partnering to improve the quality of life in the area.

The results of the April 18, 2002 walk included the correction of errors and identification of omissions on respective drawings of the Kapiolani Boulevard and University Avenue areas, and the refinement of turning movement proposals at several intersections.

Recommendation 2. Consistent with the recommendation stated above, and to ensure continued public involvement within the Primary Corridor Transportation Project (PCTP) process, would be the continuation and expansion of the working groups as "community advisors" to meet periodically and remain first-hand informed about the progress and implementation of the PCTP in their areas.

The results of the Mid-Town/University Working Group's efforts included the major refinement of rerouting a section of the University of Hawaii-Manoa In-Town BRT alignment from Ward Avenue to Pensacola Street, thereby improving the planned service to the medical facilities, businesses, schools, Blaisdell Center, and residents of the area, and avoidance of unnecessary problems had the route remained on Ward Avenue. Less major refinements included: (1) relocation of the transit stops in "downtown Mo'ili'i" between the H-1 Freeway and South King Street; (2) retention of the median strip and majority of street trees on University Avenue between South King Street and Kapiolani Boulevard; and (3) confirmation of and adjustments to Sinclair Circle and vicinity as the UH-Manoa terminus.

Partnering Opportunities. The Primary Corridor Transportation Project offers a tremendous opportunity to foster potential public and private partnering relationships between the BRT proposal and other coincidental, contemporaneous planning and development activities to improve the quality of life and overall vitality in the respective neighborhood areas along the branch alignments.

As an example, the importance of BRT service along the University Avenue corridor and the infrastructure improvements necessary for the implementation of the Refined BRT Alternative create both challenges and opportunities to improve that area of Mo'ili'i - especially the connection between the University of Hawaii campus and the "Varsity/Puck's Alley" area. Several ideas have been expressed recently concerning how to overcome the

May 7, 2002

H-1 Freeway barrier and provide safe and attractive pedestrian and bicycle connections which do not conflict with vehicular traffic - including at-grade pass-through tunnels under H-1. If this central maui area of the "University Town Center" is to succeed in the future, then safe, convenient, and attractive access must be provided and the existing barriers transformed or otherwise overcome.

**Oahu Trans 2K Context.** The Refined BRT Alternative is just one part of the overall "Oahu Trans 2K" transportation improvement program effort which has relied on tremendous community participation. To focus on only one other component of the multi-faceted effort, especially as it relates to the relationship with BRT, is the on-going program to redesign the route system of TheBus in order to rely on a "hub and spoke" system which will provide better connections within and between districts. Circulator routes within specific areas (such as Manoa Valley) and better connections to hubs which connect to express, inter-district, and larger intradistrict routes are in the design stage and include significant community participation to determine the needs, preferences, and priorities of service.

**Generally Expressed Concerns.** At this time in the process, the three most expressed concerns regarding the Refined BRT Alternative seem to be the following.

**1. Exclusive Lanes.** The effect of creating exclusive lanes for BRT use, especially in the Dillingham Boulevard, Kapiolani Boulevard, University Avenue, and Waialae areas. For BRT to work effectively, there are several areas where exclusive lanes must be instituted. As a part of the larger Oahu Trans 2K context, with a coordinated long-term educational campaign, and with the above recommendations to (1) keep and expand the working groups as an integral part of the PCTP program and (2) to walk the entire length of the various alignments with representatives of the respective neighborhoods, many of the anticipated problems with the implementation of exclusive lanes may be avoided.

**2. Effect on Mauka-Makai Traffic Flow.** For all of transportation to work effectively, the improvements to Ewa to Koko Head (west to east) linear traffic flow cannot be allowed to further slow or degrade the level of service of the already painfully congested and aggravatingly slow mauka-makai (north-south) traffic during commute times. Adjustments to capacity, traffic signal timing, implementation of the switch in directions of the mauka portions of Piikoi and Pensacola streets, etc., must be a coordinated effort to benefit the total traffic flow, not just BRT; and transformation of TheBus route system to the hub and spoke model must serve to reduce vehicle use by making public transit more accessible, more efficient, and more economical.

**3. Financial Plan.** More explanation of the financial plan is needed to educate the community as to the total cost of the Refined BRT Alternative, the potential share of federal funds to be available for the program, and that no increase in taxes is necessary to implement BRT as proposed. Opportunities for private transportation services in addition to public transit remain and should be broadened to better serve the needs of all of our residents and visitors.

**Issue of Honolulu's Credibility with Federal Agencies.** Due to the past two decisions (the last about 1993) of the Honolulu City Council to not proceed with the then proposed versions of a mass transit system for urban Oahu, even when a larger share (about 80/20) of federal funds was then available compared to today (about 60/40), I believe that a fundamental issue in this Primary Corridor Transportation Project process, and the

May 7, 2002

competitive process which must be successfully navigated in order to qualify for federal funds, is the credibility of the City & County of Honolulu with the responsible federal agencies - the Federal Transit Administration and Federal Highway Administration of the United States Department of Transportation.

The merits and demerits of the previous "rail-based" proposals are now moot. A new day has arrived concerning what type of mass transit project will be considered, how much federal funding may be available, and the more competitive process used to determine whether a project will qualify for a portion of the limited federal funds. The project elements, manner of implementation, flexibility for accommodating changes, and manner of funding of the current proposal are now at issue.

Honolulu is one of the few cities on Earth with a geographic layout, especially in the primary urban area, that concentrates the population in a manner that would be efficiently served by a linear mass transit system. By the 2000 Census results, Honolulu remains the 11th largest metropolitan area in the United States.

The question of what type of mass transit system is appropriate, acceptable, affordable, adaptable (from day one -- whether related to ease of route adjustments, system expansion, vehicle type, or energy source (petroleum, electricity, fuel cell)), and sustainable seems to have been reasonably resolved.

The question of when any mass transit system, as distinguished from the present bus system alone, may be adopted by action of the Honolulu City Council and subsequently implemented is now under consideration by that legislative body.

The question of accessibility to the mass transit system must be evaluated in the scope of the overall transportation system improvements being addressed in the Oahu Trans 2K program (hub and spoke, circulator routes, information technologies, bicycle routes, etc.).

The question of how much can we afford for the development of a mass transit system, whether the Refined BRT Alternative or any other proposal, is a policy and economic question that remains to be determined, yet seems to also have been responsibly resolved by the financial analysis presented in Chapter 6 of the SDEIS. It may be difficult to afford in relation to all of our other needs as a metropolis, but we cannot afford not to develop a responsible mass transit system for our residents, visitors, and economic future. I especially look to the experience of Vancouver, British Columbia with its variety of land and water transportation modes that effectively serve residents and visitors alike.

With the continuation of the Primary Corridor Transportation Project, the selection of the Bus Rapid Transit Alternative as the Locally Preferred Alternative by the Honolulu City Council, and the project's imminent review in the competitive process for federal funds, the credibility of the City & County of Honolulu is at stake to "stay the course" and remain committed to the continued refinement and implementation of the BRT alternative in the near-term.

Failure as a community to do so will surely and understandably cause the federal agencies involved to politely defer or otherwise refuse any further consideration of Honolulu for any funding related to mass transit system needs. Using a baseball analogy, by the City & County of Honolulu's ultimately deciding not to proceed on two earlier mass transit

proposals, a third decision not to proceed after this much study (practice) and time at the plate will certainly mean "one, two, three strikes -- you're out!" for the indefinite future. That would not be in the best interests of our people.

Much work remains to be done in order to proceed with the Primary Corridor Transportation Project and the implementation of the Refined Bus Rapid Transit Alternative. As stated above, "the devil will be in the details," and I look forward to participating in the resolution of those details.

Thank you for considering these comments in relation to the SDEIS and the continued progress on the Primary Corridor Transportation Project.

*Tom Heinrich*

Mr. J. Thomas Heinrich  
2426 Armstrong Street  
Honolulu, Hawaii 96822

Dear Mr. Heinrich:

Subject: Primary Corridor Transportation Project

This responds to the comments you made on the Major Investment Study/Draft Environmental Impact Statement (MISDEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to the oral comments you made regarding the MISDEIS at the October 5, 2000 Special Transportation Committee Meeting, the October 12, 2000 MISDEIS Public Hearing and the your oral testimony at the October 26, 2000 Special Transportation Committee Meeting. Part B responds to the oral comments you made at the SDEIS April 20, 2002 Public Hearing and your May 7, 2002 letter regarding the SDEIS.

Part A -- MISDEIS Comments

1. I personally do support the Bus Rapid Transit alternative based on the flexibility toward the long term as well as the cost elements. Having the greatest return and would support the BRT as a Local Preferred Alternative by the time that the Council gets to having to make that selection.

Response: Thank you for supporting the project.

2. I also appreciate that the Sand Island Parkway has been separated from this portion of the process. I think it is a critical element in a long-term transportation improvements for the City and County of Honolulu but is not a necessary element of this slice of that process.

Response: Comment noted.

3. The need to correlate part of this presentation to the other changes to the existing bus system through other elements of the Oahu Trans 2K and as well part of that is based on the present success of the CityExpress Route A that connects to the University but also how future relationships with the existing Rainbow shuttle, Kapahulu trolley, etc. would also tie into the BRT.

Response: The elements of the PCTP are being coordinated with other transportation alternatives as mentioned in the comment.

4. Also important here is the relationship to the ongoing revision process to the primary urban center development plan particularly as the PUC DP includes references to developing "neighborhood plans." And one of the key elements there being trying to avoid the division of existing neighborhoods by yet additional highways or major transportation constructs.

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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE XEONG MALUOTO  
DEPUTY DIRECTOR

November 13, 2002

**Response:** The major elements of the In-Town BRT will use existing streets and the travel way would be all at-grade (i.e., street level). Therefore, no neighborhood would be physically or visually divided. The transit stops will not divide the neighborhoods, to the contrary these stops have the potential to be places where community members from different neighborhoods come together.

5. **Two more points here. That is, the devil will be in the details even as Mr. Bennett was suggesting and there is the need for continued community meetings as we move through the process in order to move from the most general to the very specific in our area. Do we go up Isenberg? Do we stay on Kapiolani? Do we go on University Avenue? Is the terminus at Market City or Puck's Alley or Sinclair Circle, etc. And there are many aspects of that.**

**Response:** DTS agrees that continued community involvement is very important and is committed to obtain community input throughout the remaining phases of the project. However, when the Honolulu City Council passed a resolution that identified the BRT Alternative as the "locally preferred alternative" (LPA), it generally chose the basic alignment described in the MIS/DEIS. There are slight modifications to the alignment that are described in the Supplemental Draft Environmental Impact Statement (SDEIS) including a Kakaako Makai branch, modification of the UH-In-Town Branch and addition of access ramps to H-1 near Aloha Stadium. These modifications were a result of comments to the MIS/DEIS and project refinements identified by the working area groups comprised of community members.

6. **My personal preference is for the Bus Rapid Transit Alternative as discussed in the document as I find that the No-Build or no-action alternative is unacceptable in relation to our present situation. The Transportation System Management alternative is insufficient. And the Bus Rapid Transit at this point would be more flexible.**

**Response:** Thank you for supporting the project.

7. **But I also incorporate some of Callan, Dennis's comments, that there are other things that still need to be considered in terms of the final technology and the final implementation of whatever rapid transit system ultimately is implemented.**

**Response:** Many factors will be considered in selecting the long-term technology.

8. **As well as appreciated by the present document is the commitment to avoid any new lanes and to maximize the Federal funding sources under the present proposal. Also appreciated is the separation of the Sand Island Parkway component and placement of that into the separate Oahu Regional Transportation Plan process.**

**Response:** Comment noted.

9. **What is certainly likely to be the most important test to continue is the need for additional community-based and community-specific needs as the difference will be in the detail for the ultimate implementation of whatever rapid transit system.**

**Response:** DTS agrees that continued community involvement is very important and is committed to obtain community input throughout the remaining phases of the project.

10. **My particular interest or area of interest obviously is the Manoa/McCully/Moiliili area. And here there are a host of questions concerning which main routes -- Isenberg, University, etc. -- should be used, what transit centers or where should the transit centers be located; nothing that Market City or other aspects of Kaimuki or even Kapiolani Community College are not addressed by this proposal.**

**Response:** The UH-Manoa BRT branch traverses Kapiolani Boulevard and University Avenue passing through the McCully/Moiliili community before reaching UH-Manoa. Proposed transit stop locations are the Isenberg Stop, University/King Stop and University of Hawaii - Manoa (UH) stop. Local buses and circular routes will interface with the BRT alignment and will continue to service other areas of Kaimuki, Market City and Kapiolani Community College.

11. **Also, I note that, in particular, the Chapter Two area of the DEIS could be beefed up in terms of including additional information about the relationship of this proposal to the other bus route changes that are being considered under Oahu Trans 2K and as well as additional information concerning the other transportation bikeway, park, and beautification efforts that are ongoing, and as well in relationship to the Primary Urban Center Development Plan Revision process.**

**Response:** The proposed bus route changes can be obtained from the City's Oahu Transportation Services Department. Details on bikeway modifications are described in the Honolulu Bicycle Master Plan. The City's Department of Parks and Recreation can be contacted to obtain information regarding park and beautification projects.

The Refined LPA is evaluated in the FEIS as being consistent with the Public Review Draft of the PUC DP (June 1998), as it relates to the "high capacity transit corridors" and "urban villages" concepts. These concepts are supportive of and consistent with the type of transportation improvements provided by the Refined LPA. The In-Town BRT is designed to support current land uses and help shape future uses particularly in vacant and underutilized parcels in Kakaako, Hwaii, and near Ala Moana Center and the Convention Center. These are the locations where development is likely to occur with or without the BRT project.

12. **Also, I'd particularly note that on page 2-43, there are some specific but very vague references to State Department of Transportation, I'll say, suggest improvements for the Punahou to 6th Avenue of the H-1 corridor, and that as well should be further spelled out in relationship to the BRT.**

**Response:** The suggested improvements on H-1 between Punahou Street and 6<sup>th</sup> Avenue are not part of the scope of the BRT project, they are addressed in OMP's TOP 2025.

13. **In this way, I support the BRT as a locally preferred alternative, upon completion of the Final EIS and thorough preparation of the -- as we proceed here for the Federal Transit Administration's national grant competition process.**

**Response:** Thank you for supporting the project.

14. **I do support the Bus Rapid Transit alternative as the Locally Preferred Alternative.**

**Response:** Thank you for supporting the project.

15. In the past couple of weeks following the first hearing at the Convention Center, some of the concerns that I have heard well express either to me or in some of the community meetings and not at these hearings had to do with, again, the location of the transit centers, the locations of some of the main elements of the routes in the Manoa/University/McCully/Moiliili area. We're particularly concerned about whether it is a King Street or Kapikani or Isenberg/University type of placement. Those are questions to be determined later but especially as Director Cheryl Soon referenced earlier this evening, it is a matter that the community-based elements of this planning certainly must continue and that is really going to be what makes any alternative successful.

Response: The proposed transit centers will undergo their own independent environmental review process to address their related impacts and mitigation measures. At that time, details about individual transit centers' specific locations, physical characteristics and operations will be addressed.

When the Honolulu City Council passed a resolution that identified the BRT Alternative as the locally preferred alternative (LPA), it generally chose the basic alignment described in the MISDEIS. There are slight modifications to the alignment that are described in the Supplemental Draft Environmental Impact Statement (SDEIS) including a Kakaako Makai branch, modification of the UH-In-Town Branch and addition of access ramps to H-1 near Aloha Stadium. These modifications resulted from comments to the MISDEIS and project refinements identified by the working area groups comprised of community members.

DTS agrees that continued community involvement is very important and is committed to obtain community input throughout the remaining phases of the project.

16. The other element both for the Committee, I believe, and as this process continues is what I'll simply call the overlay of GIS information. My short way of saying this is not simply a single element in the overall problem. Coordination with State DOT, particularly for references in the Draft Environmental Impact Statement to a Manoa interchange to changes for the Vineyard/Lunenburg area. Those simply cannot be completely ignored regardless whether they are looking TSM or BRT, etc.

Response: The TOP 2025 project looked at the combined highway and transit needs in the future and the resultant plan comprises a multi-modal transportation system for the future. The impact analyses in this FEIS reflect the TOP 2025 highway projects when matched in combination with the three transit Alternatives (No-Build, TSM and Refined LPA).

17. With my other written testimony that I'll be submitting the key is that I personally do support the BRT but it must be worked out with the rest of those details. For instance, with the University of Hawaii, which is concerned as to the terminus not being at the Sinclair Circle but rather a little bit further mauka to co-relate to the Meikali intersection and other opportunities in that area. There is considerable concern about, not concern about the success of Route A, but rather for the improvements that are presently needed at that Sinclair half-circle that as the buses must re-enter the flow they must cross three lanes of traffic and then go in either direction. There are longer term co-relations to the University campus master plan and other potential University and private development opportunities on a very small scale at that location of the Meikali and University intersection. If you're familiar with the area, there used to be a Burger King there. That facility closed. And what I tried after that has not made it successful. Similar to many other University areas, there is not an immediate nearby small scale student commercial section. So, that's one of the alternatives being looked at for literally half a block mauka.

Response: Thank you for supporting the project. The design treatments at Sinclair Circle have been discussed in the Mid-Town/University Working Group and with UH-Manoa facilities personnel.

Part B - SDEIS Comments

18. I'm speaking briefly here in my individual capacity and not as chair of the Manoa Neighborhood Board No. 7. The Manoa Neighborhood Board, as a board, has not taken a position on BRT, but I and several other members have been participants in the Mid-Town/University Working Group as part of this overall effort.

Response: Comment noted.

19. For especially this project, the scope of this project, of course, the devil will be in the details.

Response: The DTS will continue working with the neighborhood boards, agencies, organizations, and citizens throughout project development, design, and implementation.

20. You've heard a number of the major concerns already. They include the mauka-makai interference because of not being really aware of how the pieces of the larger puzzle of Oahu Trans 2K will fit together, particularly with the hub-and-spoke considerations and the circulator routes. So we're not really sure what that overall picture is just yet. I do understand, however, and as John Steakquist has mentioned, that there are beginning to be some presentations and meetings in the Makiki, McCully, Moiliili, Manoa area for the next many months in order to address finally that portion of Oahu Trans 2K in our area of Honolulu.

Response: Meetings on conversion of the existing bus system to hub-and-spoke are scheduled to begin in FY 2003.

21. I would encourage, as a major point here, your continued work by the Department of Transportation Services and its consultants on this project with all of the communities along the route. As an example, it was just this past Thursday, two days ago, that several of us were finally able to meet with several of the consultants in order to walk along University Avenue between H-1 and Kapikani Boulevard in order to take a very specific look and a refined look at what trees are in danger, what exactly the parking loss will be, what the other turn movement impacts will be?

Response: The DTS and its consultants will continue working with communities along the route, through the remainder of the planning phase, and through design and construction. Tree, parking, and traffic impacts are all being addressed throughout consultation with agencies, community organizations, and residents.

22. Because those that joined us are those that have lived there for a long time. And in that respect, it is this type of local knowledge along every portion of the route that is not yet reflected in the Supplemental Draft EIS. A large amount of work has already gone into that, and the Mid-Town/University Working Group did, as well, come up with one of the major changes, moving part of the UH branch from Ward Avenue to Pensacola Street.

Response: We concur that local knowledge is invaluable in project planning and design. The SDEIS is based on changes as a result of community involvement, one of which was the alignment change from Ward Avenue to Pensacola Street.

23. One of the major points here is that there also exists many other opportunities for public and private partnering in relation to transportation in general and Bus Rapid Transit in particular.  
**Response:** The DTS recognizes the value of involving the citizens in public transit and plans to continue their involvement.

24. As the University of Hawaii is our biggest neighbor in the Manoa Neighborhood Board district, it's a matter that we have to deal with a neighbor that is, on a weekday basis, having a larger population than Hilo or Kahului or Lihue. In that respect, also the rest of those effects affect the surrounding neighborhood in terms of the commuter parking.  
**Response:** The PCTP is an effort to address traffic and parking congestion issues such as the one you described around the University area. By providing a transit alternative to major destinations such as UH, DTS intends to help alleviate the traffic congestion caused in part by the constraints of existing roadways.

25. So I will submit other things in writing. But I'm in support of the Bus Rapid Transit, so long as the community continues to be greatly involved in being able to evaluate every detail along the way by the continuation of working groups and their expansion.  
**Response:** Thank you for attending the public hearing, sharing your thoughts, and supporting the project. We will continue to involve the public throughout project development and implementation.

26. I support the Refined Bus Rapid Transit Alternative as set forth in the SDEIS, especially as compared to the No-Build Alternative and Transportation System Management Alternative.  
I recognize and appreciate the contributions of the 5 Working Groups in proposing BRT adjustments, especially as I was a participant in the Mid-Town/University Working Group which recommended one of the major refinements addressed in the SDEIS (re-routing a short section of the University of Hawaii-Manoa (UH-Manoa) In-Town BRT alignment from Ward Avenue to Pensacola Street).

**Response:** Thank you for your support and participation in the project.

27. However, recognizing that the devil will be in the details\* and refinement of the BRT Alternative must continue as the planning and implementation phases progress, I strongly recommend that the planning consultants together with the representatives from the respective neighborhood areas literally walk each segment of the proposed branch alignments in order to (1) verify the accuracy and details of the existing conditions and proposed project elements as represented in the preliminary drawings included in the SDEIS, and (2) gather specific "local knowledge" concerning the actual traffic, parking, and driver behavior conditions along the proposed branch routes, and suggestions for refinements at specific locations along the same.

As an example, in order to address questions raised by the McCully/Moiliili Neighborhood Board No. 8 concerning apparent inconsistencies between representations made in presentations to the Board and what appears in the SDEIS regarding the loss or relocation of trees, removal of on-street parking stalls, and other adjustments, 3 members of the Mid-Town/University Working Group and/or McCully/Moiliili Neighborhood Board No. 8 met with 3 of the project consultants on Thursday morning April 18, 2002 to walk the length of University Avenue for the purposes of

evaluating (1) existing conditions; (2) traffic patterns; (3) intersection movements; (4) impacts on trees and on-street parking; and (5) the relationship of the BRT proposal to other coincidental, contemporaneous planning and development activities in the area, which offer opportunities for public and private partnering to improve the quality of life in the area.

The results of the April 18, 2002 walk included the correction of errors and identification of omissions on respective drawings of the Kaploani Boulevard and University Avenue areas, and the refinement of turning movement proposals at several intersections.

**Response:** The DTS and its consultants will continue working with communities along the route, through the remainder of the planning phase, and through design and construction. Your recommendation to walk each segment together with community representatives is duly noted and will be considered on a case-by-case basis. In any case, designers will perform detailed field reconnaissance of each segment during the design phase.

28. Consistent with the recommendation stated above, and to ensure continued public involvement within the Primary Corridor Transportation Project (PCTP) process, would be the continuation and expansion of the working groups as "community advisors" to meet periodically and remain first-hand informed about the progress and implementation of the PCTP in their areas.

The results of the Mid-Town/University Working Group's efforts included the major refinement of re-routing a section of the University of Hawaii-Manoa In-Town BRT alignment from Ward Avenue to Pensacola Street, thereby improving the planned service to the medical facilities, businesses, schools, Eisner Center, and residents of the area, and avoidance of necessary problems had the route remained on Ward Avenue. Less major refinements included: (1) relocation of the transit stops in "downtown Moiliili" between the H-1 Freeway and South King Street; (2) retention of the media strip and majority of street trees on University Avenue between South King Street and Kaploani Boulevard; and (3) confirmation of and adjustments to Sinclair Circle and vicinity as the UH-Manoa terminus.

**Response:** It is the City's intent to have the already established working groups continue to provide input to the project during final design and construction.

29. The Primary Corridor Transportation Project offers a tremendous opportunity to foster potential public and private partnering relationships between the BRT proposal and other coincidental, contemporaneous planning and development activities to improve the quality of life and overall vitality in the respective neighborhood areas along the branch alignments.

As an example, the importance of BRT service along the University Avenue corridor and the infrastructure improvements necessary for the implementation of the Refined BRT Alternative create both challenges and opportunities to improve that area of Moiliili - especially the connection between the University of Hawaii campus and the "Varsity/Puck's Alley" area. Several ideas have been expressed recently concerning how to overcome the H-1 Freeway barrier and provide safe and attractive pedestrian and bicycle connections which do not conflict with vehicular traffic - including at-grade pass-through tunnels under H-1. If this central makai area of the "University Town Center" is to succeed in the future, then safe, convenient, and attractive access must be provided and the existing barriers transformed or otherwise overcome.

**Response:** We concur.



30. **Oahu Trans 2K Context.** The Refined BRT Alternative is just one part of the overall "Oahu Trans 2K" transportation improvement program effort which has relied on tremendous community participation. To focus on only one other component of the multi-faceted effort, especially as it relates to the relationship with BRT, is the on-going program to redesign the route system of TheBus in order to rely on a "hub and spoke" system which will provide better connections within and between districts. Circulator routes within specific areas (such as Manoa Valley) and better connections to hubs which connect to express, inter-district, and larger intradistrict routes are in the design stage and include significant community participation to determine the needs, preferences, and priorities of service.

**Response:** DTS has converted the City's bus routes in the Leeward area to hub-and-spoke, and is in the process of converting the routes in Central Oahu and North Shore. The Primary Urban Center will be the next area where hub-and-spoke planning and restructuring will occur. Your neighborhood board will be informed of hub-and-spoke meetings in your community.

31. **EXCLUSIVE LANES.** The effect of creating exclusive lanes for BRT use, especially in the Dillingham Boulevard, Keolu Boulevard, University Avenue, and Waialae areas. For BRT to work effectively, there are several areas where exclusive lanes must be instituted. As a part of the larger Oahu Trans 2K context, with a coordinated long-term educational campaign, and with the above recommendations to (1) keep and expand the working groups as an integral part of the PCIP program and (2) to walk the entire length of the various alignments with representatives of the respective neighborhoods, many of the anticipated problems with the implementation of exclusive lanes may be avoided.

**Response:** We concur.

32. **Effect on Mauka-Makai Traffic Flow.** For all transportation to work effectively, the improvements to Ewa to Koko Head (west to east) linear traffic flow cannot be allowed to further slow or degrade the level of service of the already painfully congested and aggravatingly slow mauka-makai (north-south) traffic during commute times. Adjustments to capacity, traffic signal timing, implementation of the switch in directions of the mauka portions of Piikoi and Pensacola streets, etc., must be a coordinated effort to benefit the total traffic flow, not just BRT; and transformation of TheBus route system to the hub and spoke model must serve to reduce vehicle use by making public transit more accessible, more efficient, and more economical.

**Response:** We concur.

33. **Financial Plan.** More explanation of the financial plan is needed to educate the community as to the total cost of the Refined BRT Alternative, the potential share of federal funds to be available for the program, and that no increase in taxes is necessary to implement BRT as proposed. Opportunities for private transportation services in addition to public transit remain and should be broadened to better serve the needs of all of our residents and visitors.

**Response:** The public information process will continue and will include expanded discussions on the financing plan. DTS has told the private transit providers that the City wants to work together to identify ways to utilize private carriers to provide some of the services in the hub-and-spoke network.

34. **Issue of Honolulu's Credibility with Federal Agencies.** Due to the past two decisions (the last about 1993) of the Honolulu City Council to not proceed with the then proposed versions of a mass transit system for urban Oahu, even when a larger share (about 80%) of federal funds was then available compared to today (about 60/40), I believe that a fundamental issue in this Primary Corridor Transportation Project process, and the competitive process which must be successfully navigated in order to qualify for federal funds, is the credibility of the City & County of Honolulu with the responsible federal agencies - the Federal Transit Administration and Federal Highway Administration of the United States Department of Transportation.

The merits and demerits of the previous "rail-based" proposals are now moot. A new day has arrived concerning what type of mass transit project will be considered, how much federal funding may be available, and the more competitive process used to determine whether a project will qualify for a portion of the limited federal funds. The project elements, manner of implementation, flexibility for accommodating changes, and the manner of funding of the current proposal are now at issue.

**Response:** The project has been developed with every intent of avoiding the pitfalls of past failed efforts.

35. Honolulu is one of the few cities on Earth with a geographic layout, especially in the primary urban area, that concentrates the population in a manner that would be efficiently served by a linear mass transit system. By the 2000 Census results, Honolulu remains the 11<sup>th</sup> largest metropolitan area in the United States.

**Response:** Comment noted.

36. The question of what type of mass transit system is appropriate, acceptable, affordable, adaptable (from day one - whether related to ease of route adjustments, system expansion, vehicle type, or energy source (petroleum, electricity, fuel cell), and sustainable seems to have been responsibly resolved.

**Response:** Comment noted.

37. The question of when any mass transit system, as distinguished from the present bus system alone, may be adopted by action of the Honolulu City Council and subsequently implemented is now under consideration by that legislative body.

**Response:** Comment noted.

38. The question of accessibility to the mass transit system must be evaluated in the scope of the overall transportation system improvements being addressed in the Oahu Trans 2K program (hub and spoke, circulator routes, information technologies, bicycle routes, etc.).

**Response:** The Refined LPA has been developed to be compatible with and in the context of all of the island-wide improvements planned for the bus, highway, bicycle, and pedestrian systems.

39. The question of how much can we afford for the development of a mass transit system, whether the Refined BRT Alternative or any other proposal, is a policy and economic question that remains to be determined, yet seems to also have been responsibly resolved by the financial analysis presented in Chapter 6 of the SDEIS. It may be difficult to afford in relation to all of our other

Mr. J. Thomas Heinrich  
Page 10  
November 13, 2002

needs as a metropolis, but we cannot afford not to develop a responsible mass transit system for our residents, visitors, and economic future. I especially look to the experience of Vancouver, British Columbia with its variety of land and water transportation modes that effectively serve residents and visitors alike.

Response: Comment noted.

40. With the continuation of the Primary Corridor Transportation Project, the selection of the Bus Rapid Transit Alternative as the Locally Preferred Alternative by the Honolulu City Council and the County of Honolulu is at stake to "stay the course" and remain committed to the continued refinement and implementation of the BRT alternative in the near term.

Failure as a community to do so will surely and understandably cause the federal agencies involved to politely defer or otherwise refuse any further consideration of Honolulu for any funding related to mass transit system needs. Using a baseball analogy, by the City & County of Honolulu's ultimately deciding not to proceed on two earlier mass transit proposals, a third "one, two three strikes - you're out!" for the indefinite future. That would not be in the best interests of our people.

Response: We concur with your comment.

41. Much work remains to be done in order to proceed with the Primary Corridor Transportation Project and the implementation of the Refined Bus Rapid Transit Alternative. As stated above, "the devil will be in the details," and look forward to participating in the resolution of those details.

Response: Thank you for your support. See response to comment #28.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

APR 20 2002

Ms. Cheryl Soon, Director  
Department of Transportation Services  
City & County of Honolulu

Dear Ms. Soon:

Traffic in Honolulu has become such a hot item of discussion: increase in car population leads to increase in freeway improvements which leads to more traffic; or high demand for parking in such limited areas; or increase in traffic accidents. The BRT program may not take care of these problems at one time, but it does start addressing the problem by getting more cars off the road. It is a system implemented by other major mainland cities. It will provide a safe and efficient method of transportation for the community.

It is not something that will be a cure-all and transform our community in just one quick swoop. It will take time and willingness from the entire community for this to succeed. I feel it's a great step forward. Therefore, I am in support of this type of system.

Sincerely,



Kathleen Higa

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU  
630 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE 'KEOKI' MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00574

November 13, 2002

Ms. Kathleen Higa  
876 Curtis Street, #2806  
Honolulu, Hawaii 96813

Dear Ms. Higa:

Subject: Primary Corridor Transportation Project

This is in response to your April 20, 2002 letter regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. *Traffic in Honolulu has become such a hot item of discussion: increase in car population leads to increase in freeway improvements which leads to more traffic; or high demand for parking in such limited areas; or increase in traffic accidents.*

Response: Comment noted.

2. *The BRT program may not take care of these problems at one time, but it does start addressing the problem by getting more cars off the road. It is a system implemented by other major mainland cities. It will provide a safe and efficient method of transportation for the community.*

Response: We concur. Thank you for supporting the BRT project.

3. *It is not something that will be a cure-all and transform or community in just one quick swoop. It will take time and willingness from the entire community for this to succeed. I feel it's a great step forward. Therefore, I am in support of this type of system.*

Response: Again thank you for supporting the project. We agree that the BRT is one component of a greater public transportation system and will not solve all of Oahu's transportation problems, but will give citizens another option to driving a car.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE 'KEOKI' MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00576

November 13, 2002

Mr. Paul Honzik  
999 Wilder Avenue  
Honolulu, Hawaii 96822

Dear Mr. Honzik:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. *I looked at this entire plan and find that there is misunderstandings as to why Waianae and Nanakuli are not included. Don't they count? Is there people who would be traveling in a great distance? Wouldn't the bus service serve them as well? What about the other side, Hawaii Kai? Don't they deserve the same treatment, same bus service? Or are they being left out because they would prefer to use their cars?*

Response: There are bus routes from Waianae, Nanakuli, and Hawaii Kai in the Refined LPA.

2. *Then we look at also at H-2 and H-3. We have two beautiful highways which could pick up people from Mokuieia and also from Wahiawa. We have another highway that would serve Kaneohe and Kailua, and we could have bus service to them as well. This kind of disturbs me why we only use selected areas and not the entire island. Because if people have to drive in from there, they're using their cars and do not have the benefit of your bus system. I mean, this disturbs me.*

Response: The Refined LPA does not eliminate bus service to the areas mentioned.

**PRIMARY CORRIDOR TRANSPORTATION PROJECT**  
 Island of Oahu, Hawaii  
**SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT (SDEIS)**

Mr. Paul Honzik  
 Page 2  
 November 13, 2002

The information you provide on this form will help the City & County of Honolulu and the Federal Transit Administration in the future planning of the Primary Corridor Transportation Project. We appreciate any comment you may have. Comments must be postmarked or received by May 7, 2002.

Name: BARBARA L. HUMAN  
 Representing: grass roots common sense against gambling with tax payers dollars  
 Address: 2333 Kapiolani Blvd. #2903  
Hono., HI 96826

**Q**  
 Please make any comments below.

**A**  
 I returned from San Diego, CA on 3/26 having been off isle for 9 mos. Living at the Marco Polo it has always been simple to pay a shuttle a tip then he drops me at the door. Optimism prevailing there was no shuttle so six of us were on a large tour bus as this was Easter vacation. Living at the Marco Polo (being physically fit) I take the bus or walk to and from downtown, Waikiki, the U of H, even up to Kaimuki. The first thing that caught my attention was the increase of tour busses, large and vans, trolleys, the caterpillar and not to be left out but the many Renemobiles. Of course the Renemobiles are filled to capacity but the others I don't believe I've even seen ten with more than a very few people on them. Before placing a limit on new business I would make a law stating that if a large bus is not half or more filled they must use a van. The Galleria double-decker trolley came down the Ala Wai at 8:00 p.m. Non-rite empty. Who besides the tourists are going to shop Waikiki at night. They can walk. Another vastly irritating vehicle is the limo which keeps getting longer taking up another car's parking. Over the past several years council members etc. have taken various trips all over the world at the tax payer's expense with this bus issue. All of a sudden a light bulb flashed on and the Express Bus was born. During school and business hours the Express was and still is a welcomed and needed choice. However, I have noticed on weekends that there empty at night also.

3. I also am disturbed about one other thing that I learned this morning, that the bus would travel down on King Street, and then it would reverse, or it would have another lane that would go up against traffic on the other side. This is what gentleman told me. So, thereby, King Street, which takes traffic out of town has five lanes. We would destroy 40 percent of the auto traffic that's now using it, because it would be unavailable because of your dedicated system. I don't see that planning here is very well thought about. And I'm sorry, but I oppose this idea greatly.

Response: The mauka curb lane of South King Street between Richard Street and Pensacola Street will be reallocated to Ewa-bound BRT vehicles. The mauka curb lane of South King Street will function as a semi-exclusive lane, handling BRT vehicles, City buses, and vehicles turning right into cross-streets. Based on traffic analyses documented in the FEIS, South King Street would be able to handle these lane reallocations and the projected year 2025 travel demand within this segment.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
 Director

May 6th

As a woman on the verge of a "political" nervous break-down if I re-rote this mumbo-jumbo it would, no doubt, be worse in the deciphering dept. so have decided to just make a statement clearer and add a few comments.

I have become obsessed with looking into all vehicles etc. (public trans) for the past two weeks. Only once did the Mai'ki'i-Kapahuu Trolley have more than 3 passengers on it. At two different times in cone eve the caterpillar or roller coaster. whatava' you call it, had only 3 passengers. With the economy down why would tourists pay more when they can travel for less on the local bus?

Fri. nite I took the #3 from Hotel St. about 11:00 p.m. Once again, after Ala Moana Center there were 3 of us still on. I said to the driver: who needs BRT? A local guy replied: Yea, we're on a limo already! Perfect answer or what!?!?

Being as the side walk merchants were given the heave ho along with the bike-buggies, a few years ago, I cannot understand why there isn't a limit imposed by the PUC. If the greed of the PUC is causing the traffic problem to what its become then the City should take over.

Every time I board the bus I ask the driver if they had been consulted about BRT. The reply: "NO!" Why arn't the people employed by the best bus service in the world included in the decision making. Oh, just another "under the table" way of doing business in Hawaii Nei.

*Bob*

The other eve I took the bus that went down Ala Moana Blvd. from ~~Hotel~~ to Waikiki for the first time in ages. It was about 6:30 p.m. Tourists were asking the driver about the B bus. I interjected with: hey, this bus will get you there just fine; you don't need to change. The driver responded with: who was I to tell them what to do. Guess who ended up apologizing; me. It took about thirty or forty minutes bumper to bumper traffic. HOWEVER, the locals on the road should know to take Kapiolani Blvd. as traffic does always move on it.

To me the simple solution would be for Express busses at certain hours coming in from the furthest parts of the island. A definite limit on tour busses, trolleys, limos etc. With our economy as such if a business can't make it here they had better move on. Locals leave; immigrants arrive. They live differently. Are we going to be come Hong Kong? Singapore is out because one has to obey the law. If the, so called laws, "don't feed the birds," "don't remove grocery carts," "don't gamble," etc. fall on deaf ears you think our government can ban cars!?! Give me a break. If I had been on one of these past fruitless trips I would be so ashamed I would have paid my own way but, alas, there is no pride in corruption and greed.

Please excuse typing errors; ole SmtH Corona still working.

*Barbara  
Fudman*

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
850 SOUTH KING STREET, 5TH FLOOR  
DOWNTOWN HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE "TEDDY" MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD502-01884R

Ms. Barbara Hudman  
Page 2  
November 13, 2002

Ms. Barbara Hudman  
2333 Kapiolani Boulevard, Apt. 2903  
Honolulu, Hawaii 96826

Dear Ms. Hudman:

Subject: Primary Corridor Transportation Project

This is in response to your comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. I returned from San Diego, CA on 3/26 having been off isle for 9 months. Living at the Marco Polo it has always been simple to pay a shuttle a tip then he drops me at the door. Optimism prevailing there was no shuttle so six of us were on a large tour bus as this was Easter vacation. Living at the Marco Polo (being physically fit) I take the bus or walk to and from downtown, Waikiki, the U of H, even up to Kaimuki. The first thing that caught my attention was the increase of tour buses; large and vans, trolleys, the caterpillar and not to be left out the many Rene-mobiles. Of course the Rene-mobiles are filled to capacity but the others I don't believe I've even seen ten with more than a very few people on them. Before placing a limit on new business I would make a law stating that if a large bus is not half or more filled they must use a van. The Galleria double decker trolley came down the Ala Wai at 6:00 p.m. Mon. nite; empty. Who besides the tourists are going to shop Waikiki at nite. They can walk. Another vastly irritating vehicle is the limo which keeps getting longer taking up another car's parking.

Response: Comment noted.

2. Over the past several years council members etc. have taken various trips all over the world at the tax payer's expense with this bus issue.

Response: Prior to making a decision on a major project such as this, it is a common and prudent practice for elected officials to travel to other cities where similar systems have been built to see first hand the technology in operation and to talk with the planners and operators about any lessons learned that would be helpful to the proposed project. Because they recognize the value of learning first hand about what other cities have done, the Federal Transit Administration has been the sponsor of several of these trips.

3. All of a sudden a light bulb flashed on and the Express Bus was born. During school and business hours the Express was and still is a welcomed and needed choice. However, I have noticed on weekends that it's empty; at nite also. As a woman on the verge of a "political" nervous break down if I rewrote this mumbo-jumbo it would, no doubt, be worse in the deciphering dept. so have decided to just make a statement clearer and add a few comments. I have become obsessed with looking into all vehicles etc. (public trans) for the past two weeks. Only once did

the Waikiki-Kapiolani Trolley have more than 3 passengers on it. At two different times in one eye the caterpillar or roller coaster, whatever you call it, had only 3 passengers. With the economy down why would tourists pay more when they can travel for less on the local bus?

Response: The public transportation system is designed to serve Oahu residents - not tourists. The private transportation providers provide limited stop, direct routes between hotels and tourists' destinations.

4. Being as the side walk merchants were given the heave ho along with the bike-buggies, a few years ago, I cannot understand why there isn't a limit imposed by the PUC. If the greed of the PUC is causing the traffic problem to what its become then the City should take over. Every time I board the bus I ask the driver if they had been consulted about BRT. The reply: "NO! Why aren't the people employed by the best bus service in the world included in the decision making. Oh, just another "under the table" way of doing business in Hawaii Nel.

Response: The BRT project will result in additional bus driving jobs. Also, TheBus personnel participated in the working group meetings, and the BRT has been included in articles in the bus drivers' newsletter.

5. The other eve I took the bus that went down Ala Moana Blvd. from Bishop to Waikiki for the first time in ages. It was about 6:30 p.m. Tourists were asking the driver about the B bus. I interjected with: hey, this bus will get you there just fine; you don't need to change. The driver responded with: who was I to tell them what to do. Guess who ended up apologizing; me. It took about thirty or forty minutes bumper to bumper traffic. However, the locals on the road should know to take Kapiolani Blvd. as traffic does always move on it.

Response: Comment noted. This comment does not relate to the PCTP.

6. To me the simple solution would be for Express buses at certain hours coming in from the furthest parts of the island. A definite limit on tour buses, trolleys, limos etc. With our economy as such if a business can't make it here they had better move on. Locals leave; immigrants arrive. They live differently. Are we going to be come Hong Kong? Singapore is out because one has to obey the law. If the, so called laws, "Don't feed the birds," "don't remove grocery carts," "don't gamble," etc. fall on deaf ears you think our government can ban cars?!! Give me a break. If I had been on one of these past fruitless trips I would be so ashamed I would have paid my own way but, alas, there is no pride in corruption and greed.

Response: Comment noted. The City has no plans to limit tour buses, trolleys, or limousines.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HURST  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE YEKO • MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD02-00577

Mr. Larry Hurst  
1122 Elm Street, Apt. 505  
Honolulu, Hawaii 96814

Dear Mr. Hurst:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. First, I have to say let's correct it. It's not Ward Avenue. It's Pensacola Avenue that's in the plan here.

Response: We concur. One of the BRT project changes was changing the BRT alignment from Ward Avenue to Pensacola Street.

2. And that's what I really, really like about this. It will affect something of a - on many streets, and the whole island needs it, is just traffic calming, slowing people down. The DMV doesn't issue these double oh licenses to full, so that - you know, we know from recent events that everyone thinks they should be able to go faster and not pay any price for this.

Response: Comment noted.

3. I really appreciate the way the DTS came to me, and I gave them an overhead view and talked about the eight years that I've been there, what I've seen. People flooding it, going between a preschool and a high school, many seniors, many families with little children. I'm sure it's the same thing all over the island. You know, slow people down to see an oncoming bus, you know, in a lane, or have a lane they can't be in, to narrow the street down. It's much better.

Response: Comment noted. We will be glad to discuss the project at any time.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
659 SOUTH KING STREET, 3RD FLOOR  
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JEREMY HURST  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE YEKO • MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD02-00578

Mr. Ed Ige  
47-107 Hono Place  
Kaneohe, Hawaii 96744

Dear Mr. Ige:

Subject: Primary Corridor Transportation Project (PCTP)

This is in response to your oral testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. I'd like to express my concerns as an individual employed by a private transportation company within the tourist industry. I'm not opposed to the BRT as a whole and its objective to alleviate traffic congestion in the future. I disagree with the amount of money that is being funded and also some aspects of this program.

Response: Thank you for attending the public hearing and expressing your concerns regarding the project.

2. I believe that, in viewing some of the sketches outside, that the stops and the routes would benefit the tourists, take away business from our private tourist company, and also they would benefit at the expense of our tourist industries.

Response: The Refined LPA has been designed to serve residents of Oahu, not tourists.

3. If not already granted, I respectfully request that private transportation companies be granted the same privileges on the routes and the stops as the BRT in order to compete with them, not just in Waikiki, but all over Oahu.

Response: Private buses will be able to take advantage of the A.M. zipper lane extension, P.M. zipper lane, and Waiala interchange improvements. Letting private passenger carriers use all of the BRT lanes and stops would significantly slow down the BRT and make it ineffective in attracting auto drivers to transit.

Mr. Ed Ige  
Page 2  
November 13, 2002

4. *Another concern that I had is I'd like to see the three largest employers, the Federal, State, and the City, make a commitment to making plans to encourage their employees to ride the bus.*

**Response:** It is beyond the project scope to analyze encouraging federal, state, and city employees to ride the bus.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

717 Hausten Street #202  
Honolulu, Hawaii 96826  
November 6, 2000

Ms. Cheryl Soon, Director  
Dept. of Transportation  
Services  
City and County of Honolulu  
711 Kapiolani Blvd., Suite 1200  
Honolulu, Hawaii 96813

Dear Ms. Soon:

Most drivers would agree that Oahu's traffic congestion is a source of frustration and that steps need to be taken before gridlock paralyzes our streets. With regard to the City Council's current deliberations on a comprehensive transportation plan for the island, I should like to suggest that a solution that works in a freeway environment may not be optimal in an urban setting.

For the outlying areas, the Bus Rapid Transit (BRT) system may indeed be a more appropriate alternative than the No-Build Alternative and the Transportation System Management (TSM) Alternative (The Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) of the Primary Corridor Transportation Project dated August 2000). If zipper lanes and dedicated bus lanes from Kapolei to Middle Street move traffic smoothly and quickly over the freeway, people may be convinced to give up their cars and take the bus.

On the other hand, a TSM system, which would retain and increase the efficiency of our present bus system, may be better suited for the Primary Urban Center. The creation of dedicated BRT lanes within the city would substantially reduce on-street parking and thus negatively impact residents, property owners, and businesses. Moreover, the placement of BRT stations near already busy intersections could create potentially hazardous situations involving motor vehicles and pedestrians.

Since others have testified on the impact of dedicated lanes in areas such as Kalakaua Avenue and Kapiolani Boulevard, my focus will be on the segment of University Avenue in Mollili from Kapiolani Boulevard to Sinclair Circle at the University of Hawaii at Manoa. According to the MIS/DEIS report, a total of 78 parking stalls will be eliminated from that segment of University Avenue if the BRT system takes two median lanes (4-21).



Ms. Cheryl Soon  
November 6, 2000  
Page 2

One of my biggest concerns is the sub-segment between Kapiolani Boulevard and South King Street. From personal observation, approximately 52 unmarked parking stalls will be eliminated. This loss of on-street parking will negatively impact owners who had built apartments with less than one stall for each unit. For example, 738 University Avenue has 5 stalls for 8 units, 830 University has 4 stalls for 8 units. These are just two addresses that I observed as I walked down the street last month. Without on-street parking, the owners of those apartments will have more difficulties in renting units without a parking stall, and tenants with two automobiles may be forced to move to other apartments that can better accommodate their cars.

According to the MIS/DEIS, "parking facilities would be considered to replace the on-street parking, but only if they served a community purpose" (4.0). To the extent that a parking facility in Moiliili would serve a community purpose, there would still be the problem of finding space for such a facility. Moreover, residents may face financial hardship if they are required to pay a fee. They may instead attempt to find parking on nearby streets, which is already very limited in Moiliili.

Another major concern is that a bus station for the BRT is tentatively planned for construction between Varsity Theater and Puck's Alley (2-26), a section of University Avenue that is often active with multi-directional traffic flow. Cars exiting from Coyne Street, adjacent to Varsity Theater, frequently cross and turn left up University Avenue. In addition, cars making turns from South King Street often speed up University Avenue and could create a hazard for bus riders walking to and from the proposed bus stop. I should like to suggest that councilmembers examine carefully the vehicular and pedestrian traffic flow around the proposed bus station. While acknowledging that the intent of the BRT is to reduce the number of cars on the road, it is reasonable to presume that any such reduction would occur gradually over time, and that citizens should not be placed at risk during that period.

From a cost benefit perspective, to have the BRT go up to Sinclair Circle may not be in the best interest of taxpayers because enrollment at the University of Hawaii at Manoa has declined from 20,090 students during Fall 1993 (Attachment 1) to the present 17,260 for Fall 2000, according to the Institutional Research Office at the University of Hawaii at Manoa. Furthermore, the April 2000 Institutional Research Office's Enrollment Projections from Fall 2000 to Fall 2006 show that enrollment is projected to remain relatively flat (Attachment 2).

Ms. Cheryl Soon  
November 6, 2000  
Page 3

Moreover, with improved technology and lowered costs, distance learning may become a viable option for students and the university, thereby reducing further the number of commuting students in the future.

In conclusion, the proposed bus station and the elimination of on-street parking will have a negative impact on apartment owners and residents who reside on or near University Avenue. If the BRT takes the two median lanes and places a bus station on that street, traffic congestion will likely increase and could affect safety levels for drivers as well as pedestrians. Finally, the projected flat enrollment at the university does not support implementation of the BRT system in Moiliili. The TSM Alternative would minimize disruptions for residents while delivering satisfactory and cost efficient service level for the community as a whole.

Most important is that the City needs to provide more buses during peak periods. Also riders should be able to rely on a punctual, dependable transit alternative without the frustrating delays that are frequently occurring with the present bus system. Otherwise, people will not be persuaded to give up their cars.

Sincerely,



Janet S. Inamine

Attachments (2)

**FALL ENROLLMENT REPORT  
UNIVERSITY OF HAWAII  
FALL 1999**

Institutional Research Office  
University of Hawaii  
December 1999

File Reference: Management and Planning Support Folder, Enrollment

Reports available online at: <http://www.hawaii.edu/iro/maps.htm>

Attachment 1  
Page 1

**TABLE 1  
HEADCOUNT ENROLLMENT OF CREDIT STUDENTS, BY CAMPUS  
UNIVERSITY OF HAWAII  
FALL 1989 TO FALL 1999**

SEMESTER	TOTAL		UH		UH		UH		UH		UH		UH		UH		UH		UH					
	No.	Pd Chg	No.	Pd Chg	No.	Pd Chg	No.	Pd Chg	No.	Pd Chg	No.	Pd Chg	No.	Pd Chg	No.	Pd Chg	No.	Pd Chg	No.	Pd Chg				
1989	43,765	2.4	18,022	0.8	1,935	8.1	601	22.2	22,627	2.7	2,038	9.5	4,199	-2.4	5,741	2.5	1,313	6.0	5,652	3.8	2,078	2.9	1,608	3.1
1990	45,870	4.8	18,874	1.4	2,584	32.5	652	8.5	23,760	5.1	1,898	-7.0	4,303	4.4	6,292	9.6	1,424	8.5	5,812	2.8	2,346	13.9	1,627	1.3
1991	47,668	3.8	19,383	2.7	2,681	4.6	667	2.3	24,937	4.9	1,857	-2.1	4,466	1.9	6,550	4.1	1,507	5.8	6,351	8.3	2,590	10.4	1,816	-0.7
1992	49,851	4.6	19,805	2.5	2,966	10.6	692	3.7	26,328	5.6	2,207	18.8	4,774	6.9	7,132	8.9	1,580	4.8	6,135	-3.4	2,713	4.7	1,787	10.8
1993	50,847	1.6	20,090	1.1	3,174	7.0	676	-2.3	26,707	1.4	2,415	9.4	4,741	-0.7	7,275	3.4	1,464	-7.3	6,473	5.5	2,597	-4.3	1,642	-8.1
1994	51,677	2.0	20,041	-0.2	2,987	-5.9	744	10.1	27,905	4.5	2,815	16.6	4,824	1.8	7,646	3.7	1,516	3.7	6,507	0.5	2,828	8.8	1,707	7.8
1995	50,242	-2.8	19,801	-1.2	2,872	-3.8	716	-3.8	26,853	-3.8	2,811	-0.1	4,445	-7.9	7,329	-4.2	1,461	-3.8	6,368	-2.1	2,765	-2.2	1,874	-5.3
1996	47,379	-5.7	18,252	-7.8	2,800	-2.5	648	-8.5	25,679	-4.4	2,463	-12.4	4,090	-8.0	7,373	0.6	1,387	-8.4	6,014	-5.8	2,654	3.2	1,518	-8.3
1997	45,551	-3.9	17,365	-4.9	2,639	-5.6	648	0.0	24,899	-3.0	2,221	-8.6	3,970	-2.9	7,189	-2.5	1,283	-8.1	5,936	-1.3	2,767	-2.3	1,513	-0.3
1998	45,337	-0.5	17,013	-2.0	2,730	3.4	665	5.7	24,909	0.0	2,308	3.9	4,124	3.9	7,236	0.7	1,136	-11.5	5,765	-2.8	2,849	2.2	1,491	-1.5
1999 2/...	40,479	NA	17,012	NA	2,790	NA	687	0.3	25,390	NA	2,278	-1.3	4,769	NA	7,254	0.2	1,142	0.5	5,570	-3.4	2,862	0.5	1,514	1.5

1/ Beginning in Fall 1991, Hawaii Community College was transferred organizationally from UH Hilo to the UH Community College System. Data have been adjusted accordingly.  
2/ Includes continuing education credit students at UH Manoa, UH Hilo and Honolulu CC, effective Fall 1999. Percentage change calculations for these campuses, and for both the UH and UHCC systems, are comparable to prior years.  
Note: Data have been updated to include special students (concurrents, early admits and auditors) for all years shown.

TABLE 7  
 HEADCOUNT ENROLLMENT OF CREDIT STUDENTS, BY ATTENDANCE STATUS  
 UNIVERSITY OF HAWAII  
 FALL 1999 TO FALL 2006

	ACTUAL 1/		PROJECTED					
	1999	2000	2001	2002	2003	2004	2005	2006
<b>UH SYSTEM TOTAL 1/</b>	46,479	46,681	47,001	46,799	47,024	47,287	47,471	
Full-Time .....	25,958	26,075	26,233	26,276	26,183	26,422	26,513	
Part-Time .....	20,521	20,606	20,768	20,523	20,841	20,865	20,958	
<b>UH AT MANOA 2/</b>	17,632	17,656	17,734	17,778	17,756	17,610	17,632	
Full-Time .....	12,434	12,466	12,520	12,552	12,537	12,574	12,590	
Part-Time .....	5,198	5,190	5,214	5,226	5,219	5,036	5,042	
<b>UH AT HILO 2/</b>	2,790	2,832	2,896	2,938	2,943	2,960	2,982	
Full-Time .....	2,115	2,151	2,200	2,232	2,236	2,248	2,265	
Part-Time .....	675	681	696	706	707	712	717	
<b>UH - WEST OAHU</b>	687	695	697	701	708	718	729	
Full-Time .....	327	330	331	333	336	341	346	
Part-Time .....	360	365	366	368	372	377	383	
<b>UH COMMUNITY COLLEGES</b>	25,390	25,498	25,634	25,584	25,390	25,536	25,744	
Full-Time .....	11,082	11,128	11,182	11,159	11,074	11,132	11,221	
Part-Time .....	14,308	14,370	14,452	14,425	14,316	14,404	14,523	
<b>Hawaii Community College</b>	2,279	2,293	2,307	2,315	2,295	2,293	2,307	
Full-Time .....	1,303	1,311	1,319	1,324	1,312	1,311	1,325	
Part-Time .....	976	982	988	991	983	982	980	
<b>Honolulu Community College 2/</b>	4,769	4,791	4,807	4,783	4,754	4,766	4,794	
Full-Time .....	1,991	2,000	2,007	1,997	1,985	1,990	2,001	
Part-Time .....	2,778	2,791	2,800	2,786	2,769	2,776	2,793	
<b>Kapohalahou Community College</b>	7,254	7,290	7,304	7,289	7,271	7,313	7,338	
Full-Time .....	2,996	3,011	3,017	3,010	3,003	3,020	3,031	
Part-Time .....	4,258	4,279	4,287	4,279	4,268	4,293	4,307	
<b>Kauai Community College</b>	1,142	1,142	1,162	1,160	1,158	1,181	1,200	
Full-Time .....	458	458	466	473	464	474	481	
Part-Time .....	684	684	696	707	694	707	719	
<b>LeeWARD Community College</b>	5,570	5,558	5,562	5,515	5,475	5,491	5,566	
Full-Time .....	2,665	2,660	2,662	2,640	2,621	2,628	2,664	
Part-Time .....	2,904	2,898	2,900	2,875	2,854	2,863	2,902	
<b>Maui Community College</b>	2,862	2,861	2,945	2,957	2,928	2,940	3,027	
Full-Time .....	1,013	1,020	1,042	1,047	1,036	1,055	1,071	
Part-Time .....	1,849	1,861	1,903	1,910	1,892	1,925	1,956	
<b>Woodward Community College</b>	1,514	1,543	1,547	1,545	1,509	1,512	1,527	
Full-Time .....	655	668	669	665	653	654	661	
Part-Time .....	859	875	878	877	856	858	866	

1/ Headcounts include specials (auditors, early admits and concurrent students) for all years.  
 2/ Headcounts include continuing education credit enrollments, beginning Fall 1999.

ENROLLMENT PROJECTIONS  
 UNIVERSITY OF HAWAII  
 FALL 2000 TO FALL 2006

Institutional Research Office  
 University of Hawaii  
 April 2000

File Reference: Management and Planning Support Folder, Projections

Reports available online at: <http://www.hawaii.edu/ir/maps.htm>

APR 20 2002

717 Hausten Street #202  
Honolulu, Hawaii 96826  
April 19, 2002

Ms. Cheryl D. Soon, Director  
Dept. of Transportation Services  
City and County of Honolulu  
650 South King Street, 3rd Floor  
Honolulu, Hawaii 96813

Dear Ms. Soon:

Thank you for the copy of the March 2002 Supplemental Draft Environmental Impact Statement.

My focus will be again on the segment of University Avenue from Kapiolani Boulevard to Sinclair Circle at the University of Hawaii Manoa.

1. The loss of approximately 78 on-street parking on University Avenue will negatively impact the community. Section S3.1 of the March 2002 Supplemental Draft Environmental Impact Statement states that "when on-street parking is removed....new neighborhood parking facilities would be considered to replace the on-street parking, but only if they served a community purpose."

"Only if they served a community purpose" is very vague and does not in any way assure the Moiliili community that there will be replacement parking for businesses, apartment owners, residents, and for those who work in this neighborhood. Furthermore, since vacant, inexpensive land is not readily available at this area, residents will be burdened by the added cost of parking facilities' fees, if the City purchases properties.

2. The proposed transit stop in the middle of University Avenue, between Varsity Theater and Puck's Alley, will endanger vehicular and pedestrian traffic. Current multi-directional traffic flow near this transit stop will create an extremely hazardous situation. Also, cars may not be able to stop in time, if bus riders, especially seniors and children, impulsively run across University Avenue to the transit station.

3. The Institutional Research Office at the University of Hawaii at Manoa details a decline in enrollment from 20,090 for Fall 1993 to 17,532 for Fall 2001 (A1). The Fall 2002 to 2008 Enrollment projections have various ranges from 17,000 to 20,000 (B1). However, the school's newsletter, Ku Lema, reports Spring 2002 enrollment of 16,972 (C), indicating perhaps a future low range of 17,000-18,000 students at the Manoa Campus.

Ms. Cheryl Soon  
April 19, 2001  
Page 2

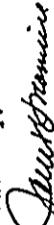
Moreover, if West Oahu College is built, clearly a large number of students will choose to enroll there. Furthermore, the 2002 Summer Program offers a number of online and distance learning courses (D,E). If more of these courses are offered during the regular school year, on-campus enrollment may decline at Manoa.

Because of the negative impact of the loss of on-street parking and the possible decline of enrollment at the University of Hawaii, the TSH Alternative, rather than the Refined BRT Alternative, would minimize disruptions for residents while delivering satisfactory and cost-efficient service level for the Moiliili community as well as the University of Hawaii. The City could then use that savings for other needed transit expenditures.

In closing, I strongly feel that the BRT should be first implemented from the Kapelei area to Middle Street. Only by decreasing the number of cars coming into the primary urban area can the City really decide what system should be implemented for the inner, individual communities.

Attached also is a copy of my testimony with attachments that was submitted on November 6, 2000 to Chair Duke Bainum, City & County Transportation Committee. This copy explains in detail my concerns about the Bus Rapid Transit system.

Sincerely,



Janet Inamine

attachments

**FALL ENROLLMENT REPORT**  
**UNIVERSITY OF HAWAII AT MĀNOA**  
**FALL 2001**

Institutional Research Office  
 University of Hawaii  
 November 2001

File Reference: Management and Planning Support Folder, Enrollment

Reports available online at: [www.hawaii.edu/irmaps.htm](http://www.hawaii.edu/irmaps.htm)

**TABLE 2**  
**HEADCOUNT ENROLLMENT OF CREDIT STUDENTS BY EDUCATIONAL LEVEL**  
**UNIVERSITY OF HAWAII AT MĀNOA**  
**FALL 1991 TO FALL 2001**

EDUCATIONAL LEVEL	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001
<b>TOTAL 1/</b>	19,303	19,865	20,090	20,041	19,801	19,252	17,365	17,013	17,612	17,263	17,532
<b>% Change 2/</b>	2.7	2.5	1.1	-0.2	-1.2	-7.5	-1.9	-2.0	NA	-2.0	1.6
<b>CLASSIFIED</b>											
Undergraduate	12,530	12,538	12,991	12,903	13,050	12,216	11,762	11,500	11,458	11,161	11,485
Freshmen	2,091	2,150	2,156	2,217	2,295	1,813	1,920	1,923	1,925	2,014	2,142
Sophomores	2,587	2,551	2,815	2,776	2,227	2,227	2,074	2,037	2,019	2,030	2,155
Juniors	3,408	3,360	3,279	3,252	3,227	3,116	2,898	2,822	2,781	2,699	2,834
Seniors	4,444	4,757	4,941	5,074	5,162	4,960	4,782	4,718	4,753	4,438	4,354
Graduate	5,005	5,207	5,343	5,518	5,220	4,789	4,514	4,508	4,741	4,667	4,536
Master's	2,665	2,830	2,875	3,115	3,054	2,834	2,704	2,687	2,844	2,785	2,782
Doctoral	1,258	1,328	1,404	1,425	1,372	1,276	1,271	1,234	1,217	1,179	1,191
First Prof.	439	451	459	450	453	456	448	458	476	485	500
Ph.D. / G.Cert.	373	433	442	461	459	460	448	461	476	485	500
Grad Special / Cert.	40	67	63	67	68	44	43	58	53	48	30
<b>UNCLASSIFIED</b>											
Undergraduate	1,805	1,788	1,895	1,581	1,500	1,229	1,060	1,002	1,405	1,543	1,477
Graduate 4/	1,310	1,337	1,284	1,217	1,169	930	813	711	832	878	942
<b>NO DATA</b>											

1/ Headcount includes Specials (early admits, concurrent and auditors) for all years shown - updated Fall 1999.  
 2/ Headcount includes Outreach College, beginning Fall 1998. Percentage change for Fall 1999 is therefore not comparable to prior years. Excluding Outreach College, the Fall 1999 headcount is estimated to have been 19,777; the percentage change for Fall 1999 would have measured -1.4%.  
 3/ Headcount for Post Baccalaureate and Professional Diploma in Education offered in the College of Education. For years prior to Fall 1998, includes headcount for Professional Diploma Program only.  
 4/ Includes students enrolled in the Pre-Admission to Law Program in the School of Law.

**ENROLLMENT PROJECTIONS  
UNIVERSITY OF HAWAI'I AT MĀNOA**

**FALL 2002 TO FALL 2008**

Institutional Research Office  
University of Hawai'i

February 2002

File Reference: Management and Planning Support Folder, Projections

Reports available online at: <http://www.hawaii.edu/irmaps.htm>

Attachment B

**TABLE 1  
HEADCOUNT ENROLLMENT OF CREDIT STUDENTS  
LOW, MIDDLE AND HIGH PROJECTION SERIES  
UNIVERSITY OF HAWAI'I AT MĀNOA  
FALL 2001 TO FALL 2008**

PROJECTION SERIES	ACTUAL		PROJECTED					
	2001	2002	2003	2004	2005	2006	2007	2008
<b>HIGH SERIES TOTAL</b>	<b>17,532</b>	<b>18,225</b>	<b>18,781</b>	<b>19,298</b>	<b>19,828</b>	<b>20,419</b>	<b>20,968</b>	<b>21,490</b>
Classified	16,021	16,696	17,252	17,769	18,299	18,890	19,439	19,961
Undergraduates	11,485	11,998	12,446	12,854	13,272	13,748	14,179	14,580
First-Time Freshmen	1,650	1,743	1,706	1,761	1,862	1,962	2,003	2,076
Continuing / Returning	8,298	8,672	9,110	9,414	9,681	10,005	10,395	10,723
Transfer	1,537	1,583	1,630	1,679	1,729	1,781	1,781	1,781
Graduates	4,536	4,698	4,806	4,915	5,027	5,142	5,260	5,381
Unclassified	1,511	1,529	1,529	1,529	1,529	1,529	1,529	1,529
Undergraduates	569	570	570	570	570	570	570	570
Graduates	942	959	959	959	959	959	959	959
<b>MIDDLE SERIES TOTAL 1/</b>	<b>17,532</b>	<b>17,828</b>	<b>18,038</b>	<b>18,223</b>	<b>18,433</b>	<b>18,701</b>	<b>18,975</b>	<b>19,267</b>
Classified	16,021	16,317	16,527	16,712	16,922	17,190	17,464	17,756
Undergraduates	11,485	11,737	11,922	12,082	12,267	12,510	12,759	13,026
First-Time Freshmen	1,650	1,697	1,634	1,668	1,738	1,802	1,844	1,916
Continuing / Returning	8,298	8,490	8,705	8,907	9,098	9,263	9,405	9,555
Transfer	1,537	1,560	1,583	1,607	1,631	1,655	1,655	1,655
Graduates	4,536	4,580	4,605	4,630	4,655	4,680	4,705	4,730
Unclassified	1,511	1,511	1,511	1,511	1,511	1,511	1,511	1,511
Undergraduates	569	569	569	569	569	569	569	569
Graduates	942	942	942	942	942	942	942	942
<b>LOW SERIES TOTAL</b>	<b>17,532</b>	<b>17,435</b>	<b>17,349</b>	<b>17,229</b>	<b>17,146</b>	<b>17,119</b>	<b>17,166</b>	<b>17,288</b>
Classified	16,021	16,005	15,919	15,799	15,716	15,689	15,736	15,858
Undergraduates	11,485	11,478	11,392	11,272	11,189	11,162	11,209	11,331
First-Time Freshmen	1,650	1,608	1,526	1,521	1,549	1,566	1,608	1,676
Continuing / Returning	8,298	8,483	8,479	8,364	8,253	8,209	8,214	8,268
Transfer	1,537	1,387	1,387	1,387	1,387	1,387	1,387	1,387
Graduates	4,536	4,527	4,527	4,527	4,527	4,527	4,527	4,527
Unclassified	1,511	1,430	1,430	1,430	1,430	1,430	1,430	1,430
Undergraduates	569	540	540	540	540	540	540	540
Graduates	942	890	890	890	890	890	890	890

1/ The remaining tables in the report use the Middle Projection Series.

of values for each series - must do so because of the interconnectedness of the model.



# Preliminary Enrollment Figures Up Across-the-Board at UH Campuses

"We are pleased to see a notable increase in enrollment, especially in our junior and senior classes this spring semester," said Tzung. "We see this growth reflected in several key programs. Our new astronomy program is quickly attracting more students, as is our well-established marine science program, which is now housed in a brand new facility. We are also seeing growth in the biology program, perhaps due to the new conservation track and our English and communication departments have also experienced growth this semester."

Bill Ferrman, chancellor at UH West Oahu said, "The spring 2002 enrollment figures are the highest in the history of UH West Oahu. Our outreach efforts in the neighborhood of Waimanaloa and the surrounding area have resulted in a significant increase in enrollment. We are also seeing growth in the biology program, perhaps due to the new conservation track and our English and communication departments have also experienced growth this semester."

UH Hilo Chancellor Rose Tseng attributes the increase to UH Hilo's dedicated faculty, as well as the recruiting efforts of its marketing and UH Hilo's Chancellor Rose Tseng.

UH Hilo's enrollment figures prove that our efforts are making a difference. UH Hilo's enrollment figures prove that our efforts are making a difference. UH Hilo's enrollment figures prove that our efforts are making a difference.

UH Hilo's enrollment figures prove that our efforts are making a difference. UH Hilo's enrollment figures prove that our efforts are making a difference. UH Hilo's enrollment figures prove that our efforts are making a difference.

## DISTANCE LEARNING CREDIT PROGRAMS

### University Degrees Online

UH ONLINE IS DESIGNED FOR BUSY WORKING ADULTS who are eager to achieve their educational goals, but find it difficult to get to a University of Hawaii campus. In UH Online courses, you'll read course materials, complete assignments, and take online tests. You'll interact online with your professors and fellow students in an atmosphere of collaborative learning, on your own schedule — asynchronously. Specific online courses may fulfill elective requirements in other UH programs. [www.aln.hawaii.edu](http://www.aln.hawaii.edu)

#### A Selection of Summer 2002 Offerings

- COMPUTER SCIENCE COURSES**
- ICS 101/101L Tools for the Information Age
  - ICS 311 Algorithms and Data Structures
  - ICS 321 Data Storage and Retrieval

#### OTHER COURSES

- CAS 403 Information Technology and Culture
- ETEC 662 Computer Networks in Education
- FAMR 350 Group Process Leadership
- JPN 199 Directed Third Level Japanese
- LING 102 Introduction to the Study of Language
- MUS 600F Music Education Seminar Music Education and the Internet
- PACE 247 Survey of Conflict Management
- PSST 301 Populations of Hawaii
- SOC 332 Survey of Sociology of Law
- SOC 419 Analysis in Formal Organizations

#### MS Degree in Information and Computer Sciences (ICS)

See the ICS website for detailed information about this online degree program at <http://www.ics.hawaii.edu/academic/asynch/index.html>.

#### BA Program in Information and Computer Sciences

See the ICS website <http://www.ics.hawaii.edu/academic/asynch/undergrad-online.html> for more information about this partially online degree program.

#### BA Program in Liberal Studies

Liberal Studies offers two partially online interdisciplinary degrees, which include courses from computer science and the social sciences. To apply students must have completed the necessary 55 semester credits and write a 3-page proposal to qualify for admission.

All major courses in both BA programs are offered online. Other Arts and Sciences degrees may require a mixture of online, campus-based, or cable course credits. Associate of Arts programs offered by UH community colleges help students gain eligibility for entry into the bachelor's programs.

#### UH Hilo's Certificate Program in Database Management

Focus on the fundamentals and applications of database design. For more information on UH Hilo's certificate program and specific math prerequisites which can be completed at a community college, visit the UH Online website at [www.aln.hawaii.edu](http://www.aln.hawaii.edu).

#### Minimum Computer Requirements for UH Online Courses

- PC with Windows 95, 98, or NT; or a Macintosh II running System 7.5;
- Netscape Navigator 4.0 or higher; or Internet Explorer 4.0 or higher;
- email;
- at least a 28.8 modem connection (\$6K preferred for ICS majors).

#### Registration

For general information on enrolling and registering in our online distance learning programs or specific online courses, visit the *UH Online* website at [www.aln.hawaii.edu](http://www.aln.hawaii.edu).

Tuition and fees are the same regardless of where you are in the world:

- Undergraduate courses (numbered 499 & below): \$135/credit
- Post-Baccalaureate courses: 500 & above: \$179/credit

#### Questions?

Email [help@aln.hawaii.edu](mailto:help@aln.hawaii.edu)

This program partners UH Hilo, UH Manoa, UH West Oahu, and UH Community Colleges, and is supported in part by a grant from the Alfred P. Sloan Foundation.

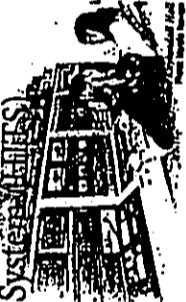


Attachment D

copy

Credit Course Schedule

## Distance Learning Through the Hawaii Interactive Television System (HITS)



**USING A 2-WAY VIDEO SYSTEM** to connect all the campuses of the University of Hawaii's system, the university's HITS program provides greater access for students throughout the state.

In addition to the video connection, students continue their in-class interactions with their instructor and fellow students via the world wide web.

**Summer 2002 HITS COURSES include:**

**Term I:**  
 SOC 493 Topics in Sociology: Globalization, 10:30-11:45am, MTWTF  
 POLS 320 International Relations, 12:00-1:15pm, MTWTF  
**Term II:**  
 COM 340 Intercultural Communication, 9:00-10:15am, MTWTF  
 CHEM 152 Survey of Organic and Bioorganic Chemistry, 5:30-8:00pm, MW  
**Cross-Term**  
 NUHS 690 Introduction to Health Policy, 5:30-8:15, Th, 4:00-7:30pm

If you are a student interested in taking HITS courses on the Midway campus, register easily by web ([www.paa.hawaii.edu](http://www.paa.hawaii.edu)) or phone (808-296-6723). Neighbor Island students contact the University Centers or Media Centers on their campuses regarding registration and course materials (registration is through UHM Outreach College).  
**Kauai:**  
 Ramona Kincaid, tel: (808) 245-8336  
 Maui, Molokai, Lanai:  
 Karen Murakami, tel: (808) 984-3577  
 Velma Panlissigui, tel: (808) 984-3444  
**Hilo:**  
 Robert Okuda, tel: (808) 974-7655  
 West Hawaii:  
 Kathy Damon, tel: (808) 322-4865

For more information on HITS or to make suggestions regarding HITS and UH telecommunications, contact Hae Okimoto, manager of information technology services, at tel: (808) 956-5023. ©

**Marketing (MKT)**  
 For details on course offerings, call the Department of Marketing at (808) 555-6692.  
 MKT 331 Marketing Communications (I) In-depth coverage of the major communication tools used in marketing such as advertising, sales promotion, public relations and the Internet. Emphasis on integrated marketing communications. Pre: BUS 312 or consent.  
 MKT 331 Marketing Communications (II) Principles and topics related to international marketing with emphasis on strategic planning and applications. Pre: BUS 312 or consent.  
 MKT 331 Marketing Strategies (I) Decision-making by the marketing executive: integration of all elements of the marketing program based on actual business situations. Pre: 311, 321, and one other marketing course above 311; or consent.  
 MKT 690 Advanced Seminar in Marketing (I) Significant topics, problems in marketing. May be repeated with change in topic. Pre: BUS 615 or consent.  
**Mathematics (MATH)**  
 For details on course offerings, call the Department of Mathematics at (808) 956-5679.  
 MATH 100 Survey of Mathematics (I) Selected topics designed to acquaint non-science students with mathematical reasoning. May not be taken for credit after 215 or higher.  
 MATH 140 Trigonometry and Analytic Geometry (I) Functions, with special attention to polynomial, rational, exponential, logarithmic, and trigonometric functions, plane trigonometry, polar coordinates, conic sections. Pre: two years of high school algebra, one year of plane geometry, and precalculus coursework.  
 MATH 203 Calculus for Business and Social Sciences (I) Basic concepts of differentiation and integration applications to management, finance, economics, and the social sciences. Pre: two years high school algebra, one year plane geometry, and precalculus coursework.  
 MATH 211 Calculus I (I) Basic concepts: differentiation with applications; integration. Pre: a grade of C or better in 140 or 215 or precalculus assessment.  
 MATH 212 Calculus II (I) Integration techniques and applications; series and approximations; differential equations. Pre: a grade of C or better in 211 or 251 or a grade of B or better in 215; or consent. Co-requisite: 242L.  
 MATH 292L Calculus Computer Lab (I) Introduction to symbolic computer software for solving calculus problems, graphing functions and experimenting with calculus concepts. No knowledge of computer required. Co-requisite: 212.



Attachment E

717 Hausten Street #202  
Honolulu, Hawaii 96826  
November 6, 2000

Councilmember Duke Bainum  
Chair of the Committee  
on Transportation  
City & County of Honolulu  
530 S. King Street #202  
Honolulu, Hawaii 96813

Dear Councilmember Bainum:

Most drivers would agree that Oahu's traffic congestion is a source of frustration and that steps need to be taken before gridlock paralyzes our streets. With regard to the City Council's current deliberations on a comprehensive transportation plan for the island, I should like to suggest that a solution that works in a freeway environment may not be optimal in an urban setting.

For the outlying areas, the Bus Rapid Transit (BRT) system may indeed be a more appropriate alternative than the No-Build Alternative and the Transportation System Management (TSM) Alternative (The Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) of the Primary Corridor Transportation Project dated August 2000). If zipper lanes and dedicated bus lanes from Kapolei to Middle Street move traffic smoothly and quickly over the freeway, people may be convinced to give up their cars and take the bus.

On the other hand, a TSM system, which would retain and increase the efficiency of our present bus system, may be better suited for the Primary Urban Center. The creation of dedicated BRT lanes within the city would substantially reduce on-street parking and thus negatively impact residents, property owners, and businesses. Moreover, the placement of BRT stations near already busy intersections could create potentially hazardous situations involving motor vehicles and pedestrians.

Since others have testified on the impact of dedicated lanes in areas such as Kalakaua Avenue and Kapiolani Boulevard, my focus will be on the segment of University Avenue in Moiliili from Kapiolani Boulevard to Sinclair Circle at the University of Hawaii at Manoa. According to the MIS/DEIS report, a total of 78 parking stalls will be eliminated from that segment of University Avenue if the BRT system takes two median lanes (4-21).



One of my biggest concerns is the sub-segment between Kapiolani Boulevard and South King Street. From personal observation, approximately 52 unmarked parking stalls will be eliminated. This loss of on-street parking will negatively impact owners who had built apartments with less than one stall for each unit. For example, 738 University Avenue has 5 stalls for 8 units, 830 University has 4 stalls for 8 units. These are just two addresses that I observed as I walked down the street last month. Without on-street parking, the owners of those apartments will have more difficulties in renting units without a parking stall, and tenants with two automobiles may be forced to move to other apartments that can better accommodate their cars.

According to the MIS/DEIS, "parking facilities would be considered to replace the on-street parking, but only if they served a community purpose" (4.0). To the extent that a parking facility in Moiliili would serve a community purpose, there would still be the problem of finding space for such a facility. Moreover, residents may face financial hardship if they are required to pay a fee. They may instead attempt to find parking on nearby streets, which is already very limited in Moiliili.

Another major concern is that a bus station for the BRT is tentatively planned for construction between Varsity Theater and Puck's Alley (2-26), a section of University Avenue that is often active with multi-directional traffic flow. Cars exiting from Coyne Street, adjacent to Varsity Theater, frequently cross and turn left up University Avenue. In addition, cars making turns from South King Street often speed up University Avenue and could create a hazard for bus riders walking to and from the proposed bus stop. I should like to suggest that councilmembers examine carefully the vehicular and pedestrian traffic flow around the proposed bus station. While acknowledging that the intent of the BRT is to reduce the number of cars on the road, it is reasonable to presume that any such reduction would occur gradually over time, and that citizens should not be placed at risk during that period.

From a cost benefit perspective, to have the BRT go up to Sinclair Circle may not be in the best interest of taxpayers because enrollment at the University of Hawaii at Manoa has declined from 20,090 students during Fall 1993 (Attachment 1) to the present 17,260 for Fall 2000, according to the Institutional Research Office at the University of Hawaii at Manoa. Furthermore, the April 2000 Institutional Research Office's Enrollment Projections from Fall 2000 to Fall 2006 show that enrollment is projected to remain relatively flat (Attachment 2).

Moreover, with improved technology and lowered costs, distance learning may become a viable option for students and the university, thereby reducing further the number of commuting students in the future.

In conclusion, the proposed bus station and the elimination of on-street parking will have a negative impact on apartment owners and residents who reside on or near University Avenue. If the BRT takes the two median lanes and places a bus station on that street, traffic congestion will likely increase and could affect safety levels for drivers as well as pedestrians. Finally, the projected flat enrollment at the university does not support implementation of the BRT system in Moiliili. The TSM Alternative would minimize disruptions for residents while delivering satisfactory and cost efficient service level for the community as a whole.

Most important is that the City needs to provide more buses during peak periods. Also, riders should be able to rely on a punctual, dependable transit alternative without the frustrating delays that are frequently occurring with the present bus system. Otherwise, people will not be persuaded to give up their cars.

Sincerely,



Janet S. Inamine

Attachments (2)

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
630 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 533-4339 • Fax: (808) 533-4730 • Internet: www.cc.honolulu.hi.us

JEREMY HARRIS  
MAYOR



CHERILO SOON  
DIRECTOR  
GEORGE REEDY \*ARTAMOTO  
DEPUTY DIRECTOR

TPD1100-05381R  
TPD402-01608R

November 13, 2002

Ms. Janet S. Inamine  
717 Hausien Street, #202  
Honolulu, Hawaii 96826

Dear Ms. Inamine:

Subject: Primary Corridor Transportation Project

This responds to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your November 6, 2000 letter and your testimony at the November 14, 2000 Special Transportation Committee Meeting regarding the MIS/DEIS. Part B responds to your April 22, 2002 letter and your oral testimony at the April 20, 2002 Public Hearing regarding the SDEIS.

Part A - MIS/DEIS Comments

1. With regard to the City Council's current deliberations on a comprehensive transportation plan for the island, I should like to suggest that a solution that works in a freeway environment may not be optimal in an urban setting.

Response: The Primary Corridor Transportation Project (PCTP) includes a Regional BRT component and an In-Town BRT component.

The Regional BRT component that services the areas from Middle Street to Kapiolani, by providing a system of express lanes, extension of the Zipper Lane and addition of a P.M. Zipper Lane. From the Middle Street Transit Center, riders have the option of continuing into town using the In-Town BRT bus lanes or transferring to other buses servicing the urban core.

The In-Town BRT component is comprised of a mix of exclusive BRT, semi-exclusive BRT and mixed-use lanes. The BRT system strives to strike a balance between transit speed and impacts to general traffic. In segments where it was judged that roadway capacity was needed for general traffic and the BRT operation would not be significantly affected, exclusive lanes were replaced by either semi-exclusive or mixed-flow operation. In areas of high BRT ridership volumes, exclusive transit lanes were retained such as on Dillingham and through Downtown.

2. For the outlying areas, the Bus Rapid Transit (BRT) system may indeed be a more appropriate alternative than the No-Bus Alternative and the Transportation System Management (TSM) Alternative. If zipper lanes and dedicated bus lanes from Kapiolani to Middle Street move traffic smoothly and quickly over the freeway, people may be convinced to give up their cars and take the bus.

Response: Comment noted.

Ms. Janet S. Inamine  
Page 2  
November 13, 2002

3. On the other hand, a TSM system, which would retain and increase the efficiency of our present bus system, may be better suited for the Primary Urban Center.

Response: This would best occur with the Refined LPA since it gives the highest priority to transit of any of the three alternatives.

4. The creation of dedicated BRT lanes within the city would substantially reduce on-street parking and thus negatively impact residents, property owners, and businesses.

Response: The Refined LPA will encourage greater use of transit, thereby lessening the demand for on-street parking. In those locations where the reduction of on-street parking will pose difficulties for the community, DTS will evaluate different options for replacement parking, and will install such parking if it is deemed to serve a community purpose.

5. Moreover, the placement of BRT stations near already busy intersections could create potentially hazardous situations involving motor vehicles and pedestrians.

Response: One of the major design considerations of the transit stations is safety. For example, the conceptual design of transit stops located in the median includes features such as railings to discourage transit patrons from exiting the platform except at designated locations. Traffic signals and cross walks will be provided at BRT stations to allow pedestrians to safely cross the street.

6. One of my biggest concerns is the sub-segment between Kapiolani Boulevard and South King Street. From personal observation, approximately 52 unmarked parking stalls will be eliminated. This loss of on-street parking will negatively impact owners who had built apartments with less than one stall for each unit. Without on-street parking, the owners of those apartments will have more difficulties in renting units without a parking stall, and tenants with two automobiles may be forced to move to other apartments that can better accommodate their cars.

Response: Subsequent to publishing the MIS/DEIS the UH-Manoa branch alignment was rerouted from Ward Avenue to Pensacola Street. While there will still be need to remove on-street parking on Pensacola between King Street and Kapiolani Boulevard, this elimination of parking is viewed by the nearby community (McKinley High School, Makiki Christian Church, and Ala Moana/Kakaako Neighborhood Board) as an acceptable trade-off of having the BRT close-by.

7. According to the MIS/DEIS, parking facilities would be considered to replace the on-street parking, but only if they served a community purpose (4.0). To the extent that a parking facility in Moiliili would serve a community purpose, there would still be the problem of finding space for such a facility.

Moreover, residents may face financial hardship if they are required to pay a fee. They may instead attempt to find parking on nearby streets, which is already very limited in Moiliili.

Response: There are no obvious replacement parking sites in Moiliili, therefore the community will have to weigh the trade-offs involved in installing replacement vs. other community goals.

8. Another major concern is that a bus station for the BRT is tentatively planned for construction between Varsity Theater and Puck's Alley (2-26), a section of University Avenue that is often active with multi-directional traffic flow. Cars exiting from Coyne Street, adjacent to Varsity

Theater, frequently cross and turn left up University Avenue. In addition, cars making turns from South King Street often speed up University Avenue and could create a hazard for bus riders walking to and from the proposed bus stop.

**Response:** Since the City will incur additional costs for maintaining any off-street replacement parking facilities, the City Council will likely want to impose a modest parking charge for the use of the facility. The imposition of parking fees will have to be part of the trade-off analysis by the community on whether or not they want to have replacement parking.

9. I should like to suggest that council members examine carefully the vehicular and pedestrian traffic flow around the proposed bus station. While acknowledging that the intent of the BRT is to reduce the number of cars on the road, it is reasonable to presume that any such reduction would occur gradually over time, and that citizens should not be placed at risk during that period.

**Response:** The conversion of exclusive lanes will be phased in over time so that the effects of motorists diverting to transit can offset the reduction in capacity for general purpose traffic.

10. From a cost benefit perspective, to have the BRT go up to Sinclair Circle may not be in the best interest of taxpayers because enrollment at the University of Hawaii at Manoa has declined from 20,090 students during Fall 1993 (Attachment 1) to the present 17,260 for Fall 2000, according to the Institutional Research Office at the University of Hawaii at Manoa. Furthermore, the April 2000 Institutional Research Office's Enrollment Projections from Fall 2000 to Fall 2006 show that enrollment is projected to remain relatively flat (Attachment 2).

**Response:** Even if enrollment at the University of Hawaii remains relatively flat, it is still a large generator of trips and therefore a logical place to end the BRT branch.

11. Moreover, with improved technology and lowered costs, distance learning may become a viable option for students and the university, thereby reducing further the number of commuting students in the future.

**Response:** The concept of telecommuting and distance learning had not caused notable impacts on travel demand to date. The need to commute is not expected to be reduced, even with the increase in telecommuting. Transit service improvements, such as BRT, would still be in demand with the students.

12. In conclusion, the proposed bus station and the elimination of on-street parking will have a negative impact on apartment owners and residents who reside on or near University Avenue.

**Response:** See responses to comments #4 and #9.

13. If the BRT takes the two median lanes and places a bus station on that street, traffic congestion will likely increase and could affect safety levels for drivers as well as pedestrians.

**Response:** See response to comment #5.

14. Finally, the projected flat enrollment at the university does not support implementation of the BRT system in Manoa.

**Response:** See response to comment #10.

15. The TSM Alternative would minimize disruptions for residents while delivering satisfactory and cost efficient service level for the community as a whole.

**Response:** Comment noted for the support of the TSM Alternative.

16. Most important is that the City needs to provide more buses during peak periods. Also, riders should be able to rely on a punctual, dependable transit alternative without the frustrating delays that are frequently occurring with the present bus system. Otherwise, people will not be persuaded to give up their cars.

**Response:** Agreed. The Refined LPA would be most suited to achieve the commented goals since it gives the highest priority to transit of the three alternatives.

17. Support the BRT system from Kapolei to Middle Street but have concerns from Keoluani Boulevard to the University of Hawaii at Manoa.

**Response:** Comment noted.

#### Part B - SDEIS Comments

18. The loss of approximately 78 on-street parking on University Avenue will negatively impact the community. Section S3.1 of the March 2002 Supplemental Draft Environmental Impact Statement states that "when on-street parking is removed ... new neighborhood parking facilities would be considered to replace the on-street parking, but only if they served a community purpose."

**Response:** "Only if they served a community purpose" is very vague and does not in any way assure the Manoa community that there will be replacement parking for businesses, apartment owners, residents, and for those who work in this neighborhood. Furthermore, since vacant inexpensive land is not readily available at this area, residents will be burdened by the added cost of parking facilities' fees, if the City purchases properties.

**Response:** Parking impacts on University Avenue can be mitigated by providing replacement parking in the neighborhood. As discussed in Section 4.3 of the FEIS, in areas where a large concentration of parking spaces would be affected, replacement parking in new off-street parking facilities would be considered, but only if they meet other livable community objectives and are the result of community-based planning. The language in Section S.3.1 has been revised to clarify the intent of the City. The imposition of parking fees will have to be part of the trade-off analysis by the community on whether or not they want to have replacement parking.

19. The proposed transit stop in the middle of University Avenue, between Varsity Theater and Puck's Alley, will endanger vehicular and pedestrian traffic. Current multi-directional traffic flow near this transit stop will create an extremely hazardous situation. Also, cars may not be able to stop in time, if bus riders, especially seniors and children, impulsively run across University Avenue to the transit station.

**Response:** It is proposed that Coyne Street be converted to a right-turn in and right-turn out only at University Avenue. This will clean up a lot of the traffic problems at this location made.

20. The Institutional Research Office at the University of Hawaii at Manoa details a decline in enrollment from 20,080 for Fall 1993 to 17,532 for Fall 2001 (A1). The Fall 2002 to 2008 enrollment projections have various ranges from 17,000 to 20,000 (B1). However, the school's newsletter, Ku Lama, reports Spring 2002 enrollment of 16,792 (C), indicating perhaps a future low range of 17,000 - 18,000 students at the Manoa Campus.

Moreover, if West Oahu College is built, clearly a large number of students will choose to enroll there. Furthermore, the 2002 Summer Program offers a number of online and distance learning courses (D, E). If more of these courses are offered during the regular school year, on-campus enrollment may decline at Manoa.

Because of the negative impact of the loss of on-street parking and the possible decline of enrollment at the University of Hawaii, the TSM Alternative, rather than the Refined BRT Alternative, would minimize disruptions for residents while delivering satisfactory and cost-efficient service level for the Moiliili community as well as the University of Hawaii. The City could use that savings for other needed transit expenditures.

Response: See response to comment #10.

21. In closing, I strongly feel that the BRT should be first implemented from Kapiolani area to Middle Street. Only by decreasing the number of cars coming into the primary urban area can the city really decide what system should be implemented for the inner, individual communities.

Response: Timing and implementation of the P.M. zipper lane and related Regional BRT improvements must be coordinated with the State DOT. SDOT wants to widen the H-1 Freeway in the areas where the P.M. zipper lane is proposed before installing the zipper lane. Since the Iwilei-Waikiki segment of the In-Town BRT can be a viable improvement to the transit system immediately, the City Council has elected to proceed with this segment as the first step in phasing of the BRT system.

22. My focus will be on the segment of University Avenue from Kapiolani Boulevard to Sinclair Circle at the University of Hawaii - Manoa.

One, the loss of approximately 78 on-street parking on University Avenue will negatively impact the Moiliili community. Section S3.1 of the March 2002 Supplemental Draft Environmental Impact Statement states that, quote, "when on-street parking is removed, new neighborhood parking facilities will be considered to replace the on-street parking, but only if they served a community purpose," unquote.

"Only if they served a community purpose" is very vague and does not in any way assure the Moiliili community that there will be replacement parking for businesses, apartment owners, residents, and for those who work in this neighborhood.

Response: See response to comment #18.

23. Furthermore, since vacant, inexpensive land is not readily available at this area, residents will be burdened by the added cost of parking facilities' fees if the City purchases properties.

Two, the proposed transit stop in the middle of University Avenue, between Varsity Theater and Puck's Alley, will endanger vehicular and pedestrian traffic. Current multi-directional traffic flow near this transit stop will create an extremely hazardous situation.

Response: See responses to comments #18 and #19.

24. Also, cars may not be able to stop in time if bus riders, especially seniors and children, impulsively run across University Avenue to the transit station.

Response: Safety features such as rails shall be used at the transit stops to discourage pedestrians from not using crosswalks. These crosswalks will be signalized so that bus riders will not have to cross white traffic is moving.

25. Number three, the Institutional Research Office at the University of Hawaii at Manoa details a decline in enrollment from 20,080 for Fall 1993 to 17,532 students for Fall - sorry to 17,532 for Fall 2001. The Fall 2002 to 2008 enrollment projections have various ranges from 17,000 to 20,000. However, the February 22, 2002 issue of the school's newsletter, Ku Lama, reports Spring 2002 enrollment of 16,972, indicating perhaps a future low range of 17,000 to 18,000 students at the Manoa campus.

Response: Comment noted.

26. Moreover, if West Oahu College is built, clearly a large number of students will choose to enroll there. Furthermore, the 2002 Summer Program offers a number of online and distance learning courses. If more of these courses are offered during the regular school year, on-campus enrollment may decline at Manoa.

Response: Comment noted.

27. Because of the negative impact of the loss of on-street parking and the possible decline of enrollment at the University of Hawaii, the TSM Alternative, rather than the Refined BRT Alternative, would minimize disruptions for residents while delivering satisfactory and cost-efficient service level for the Moiliili community as well as the University of Hawaii.

Response: Thank you for attending the public hearing and sharing your preference for the TSM Alternative.

28. In closing, I just strongly feel that the BRT should be first implemented from the Kapiolani area to Middle Street. Only by decreasing the number of cars coming into the primary urban area can the City really decide what system should be implemented for the inner individual communities.

Response: See response to comment #21.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6376. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 523-4329 • Fax: (808) 523-4730 • Internet: www.co.honolulu.hi.us

JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE KEONI MIYAMOTO  
COUNTY DIRECTOR

November 13, 2002

TPD02-00579

Mr. Carl Jacobs  
98-1911 Kaahumanu Street, Apt. D  
Aiea, Hawaii 96701

Dear Mr. Jacobs:

Subject: Primary Corridor Transportation Project

This is in response to your testimony at the October 19, 2000 Special Transportation Committee Meeting regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. There was a question that you asked earlier this afternoon regarding the cost and our sub-cost for the study. And, I believe, the figure was \$8.2 million, Cheryl? How much of that, I would like to know, to be answered off line ... How much of that was the regional study for this area? And, I think that was a question that needs to be asked.  
Response: The expenditures for the MIS/DEIS and FEIS are for development of an island-wide transit system with a particular focus on the Primary Transportation Corridor.
2. Councilmember Okino asked a question regarding whether the on and off ramps were going to be for buses or whether they were going to be for buses and HOVs. And the response that I gather, sitting back there, was it was going to be for buses only. And the printed material indicates this for buses and HOVs.  
Response: The Luapele ramp is the only ramp currently planned. It will be for buses only.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 523-4329 • Fax: (808) 523-4730 • Internet: www.co.honolulu.hi.us

JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE KEONI MIYAMOTO  
COUNTY DIRECTOR

November 13, 2002

TPD02-00580

Mr. Ambrose Keohu  
89-170 Nanaikala Pl  
Waianae, Hawaii 96792

Dear Mr. Keohu:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, 2002 public hearing regarding your comment on the Supplemental Draft Environmental Impact Statement (SDEIS).

*I ride the bus every day. That's my transportation. I see Rapid Transit would be the best thing on this island if the thing come true. If the thing come true, I wish you all luck.*

Response: Thank you for attending the public hearing and supporting the BRT project.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 521-4329 • Fax: (808) 521-4720 • Internet: www.cc.honolulu.hi.us



JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE KEOU-LYALUOTO  
DEPUTY DIRECTOR

TPD1100-05421R

November 13, 2002

Ms. Molly Kihara  
98-099 Uao Place, #3309  
Aiea, Hawaii 96701

Dear Ms. Kihara:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the October 19, 2000 Special Transportation Committee Meeting and your November 5, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. I'm opposed to the use of the Kam Drive-In site as a transit center for the following reasons. (1) Aloha Stadium and the Kam Drive-In site are both located in Aiea. They will not necessarily serve Pearl City residents. (2) The intersection at Kaonohi Street and Moanalua Road is already congested as you have heard. (3) especially during the holiday shopping season, Moanalua Road near Pearl Ridge Center is a parking lot; (4) Additional noise impacts; (5) potential air quality impacts.

Response: The former Kamehameha Drive-In site is no longer being considered as a transit center.

2. I'm also strongly opposed to on and off ramps at Kaonohi Street. This would cause undue traffic impacts on many existing residents whose only access to a major roadway is Kaonohi Street. Specifically, along Kaonohi Street between Moanalua Road and the H-1 Freeway overpass alone, 500 condominium units would be affected. Mauka of the H-1 Freeway overpass, approximately 1,200 condominium units and 500 single family homes would be affected.

Response: The proposed on/off-ramp from Kaonohi Street onto H-1 has been eliminated from consideration. The new BRT-exclusive ramp proposed would be located near Aloha Stadium at Luapele Drive in close proximity to the Aloha Stadium's Overflow Lot that has been identified as a potential park-and-ride/transit center site. This ramp would be reversible providing access directly into the Zipper Lane during the A.M. Peak Period and egress from the Zipper Lane to Luapele Drive during the P.M. Peak Period.

3. Finally, whatever alternative is further considered, additional impact evaluations will be necessary. I recommend that the Council finalize its decision on its preferred alternative only after identifying, evaluating and choosing sites for the regional transit centers, bus on and off ramps, and other components of the alternatives. It seems possible, at this point, that feasible components may be difficult, if not impossible, to identify and implement given existing constraints.

MOLLY KIHARA  
98-099 UAO PLACE #3309  
AIEA, HAWAII 96701-3899

November 5, 2000

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813

Dear Ms. Soon,

Re: Primary Corridor Project Draft EIS

I oppose the use of the Kam Drive-In site as a transit center, for the following reasons. First, Aloha Stadium and the Kam Drive-In site are both located in Aiea, and it takes only about 7 minutes to drive between them. Pearl City and Aiea are two distinct communities, and neither of these locations will effectively serve Pearl City residents.

Second, the intersection at the northeast corner of the site is already congested without adding 500 cars trying to park at or exit the site. Waiting time at that intersection traffic light is already noticeably long. Cars trying to turn left onto Moanalua Road from Kaonohi Street often instead go straight up Kaonohi and make illegal U-turns at Uao Place to then turn right onto Moanalua Road. This is an existing safety hazard that will only get worse with a transit center. In addition, currently left turns are not allowed from Kaonohi Street into Kam Drive-In. If used as a transit center, this constraint will pose access problems and add to unsafe driving habits.

Third, during the holiday shopping season, Moanalua Road near Pearlridge Center is a parking lot. The closer it gets to Christmas, it can take 30 minutes to drive along Moanalua Road from Aiea Heights Drive to Kaonohi Street. This drive normally takes 5 minutes. With a transit center added to the mess of Pearlridge Center shoppers, this intolerable situation will be exacerbated.

In addition to the above adverse traffic problems, there will be noise impacts and air quality impacts. Existing conditions at the site would need to be assessed and potential impacts determined and addressed. For example, there are two high-rise residential buildings located between Kam Drive-In and the H-1 freeway that are already subject to traffic noise, which amplifies with increasing height.

I am also strongly opposed to on- and off-ramps at Kaonohi Street. This would cause undue traffic impacts on too many existing residents whose only access to a major roadway is Kaonohi Street. On Kaonohi Street between Moanalua Road and the H-1 freeway overpass alone, 500 condominium units would be affected. Mauka of the H-1 freeway overpass, an additional 1,200 condominium units and 500 single-family homes would be affected.

In the DEIS, alternative sites for a Regional Transit Center serving Aiea and Pearl City are neither identified nor evaluated. I hereby suggest that a transit center at Leeward Community College (LCC) instead of Kam Drive-In be considered. LCC is located in Pearl City at its western end. This site would better serve Pearl City residents because it is located in Pearl City rather than Aiea. Also, it is located at the western end of Pearl City, so Pearl City residents would be driving against the flow of rush hour traffic to get to and from this transit center.

Finally, I highly recommend that the City Council finalize its decision on its preferred alternative only after identifying, evaluating, and choosing sites for the Regional Transit Centers, bus on- and off-ramps, and other components of the alternatives. It seems likely at this point that feasible components may be difficult if not impossible to identify and implement given existing constraints and potential environmental and social impacts.

Sincerely,

*Molly M. Kihara*

**Response:** Additional impact evaluations and public input have been used to refine the transit center locations shown in the FEIS.

4. I think Aloha Stadium should be considered the site for the Aiea residents. Because to drive from the Kam Drive-in site to Aloha Stadium only takes about seven minutes. I think the Kam Drive-in site should be located somewhere further toward, if not within, the Pearl City area.

**Response:** The former Kamehameha Drive-in site is no longer being considered as a transit center. Using the Aloha Stadium overflow (Kamehameha Highway) parking lot as a transit center/park-and-ride is moving forward. In addition a transit center at the former Jim Siemens dealership and one near Hale Mohala are proceeding. All of these can serve Pearl City residents.

5. I oppose the use of the Kam Drive-in site as a transit center, for the following reasons. First, Aloha Stadium and the Kam Drive-in site are both located in Aiea, and it takes only about 7 minutes to drive between them. Pearl City and Aiea are two distinct communities, and neither of these locations will effectively serve Pearl City residents.

**Response:** See response to comment #4.

6. Second, the intersection at the northeast corner of the site is already congested without adding 500 cars trying to park at or exit the site. Waiting time at that intersection traffic light is already noticeably long. Cars trying to turn left onto Moanalua Road from Kaonohi Street often instead go straight up Kaonohi and make illegal U-turns at Uso Place to then turn right onto Moanalua Road. This is an existing safety hazard that will only get worse with a transit center.

**Response:** See response to comment #2.

7. In addition, currently left turns are not allowed from Kaonohi Street into Kam Drive-in. If used as a transit center, this constraint will pose access problems and add to unsafe driving habits.

**Response:** See response to comment #4.

8. Third, during the holiday shopping season, Moanalua Road near Pearlridge Center is a parking lot. The closer it gets to Christmas, it can take 30 minutes to drive along Moanalua Road from Aiea Heights Drive to Kaonohi. This drive normally takes 5 minutes. With a transit center added to the mess of Pearlridge Center shoppers, this intolerable situation will be exacerbated.

**Response:** See response to comment #4.

9. In addition to the above adverse traffic problems, there will be noise impacts and air quality impacts. Existing conditions at the site would need to be assessed and potential impacts determined and addressed. For example, there are two high-rise residential buildings located between Kam Drive-in and the H-1 freeway that are already subject to traffic noise, which amplifies with increasing height.

**Response:** In response to public input Kamehameha Drive-in has been eliminated as a proposed transit center site, and the proposed Kaonohi Street ramp has been relocated to Luapete Drive.

10. I am also strongly opposed to on- and off-ramps at Kaonohi Street. This would cause undue traffic impacts on too many existing residents whose only access to a major roadway is Kaonohi

Street. On Kaonohi Street between Moanalua Road and the H-1 freeway overpass alone, 500 condominium units would be affected. Mauka of the H-1 freeway overpass, an additional 1,200 condominium units and 500 single-family homes would be affected.

**Response:** See response to comment #2.

11. In the DEIS, alternative sites for a Regional Transit Center serving Aiea and Pearl City are neither identified nor evaluated.

**Response:** See response to comment #4.

12. I hereby suggest that a transit center at Leeward Community College (LCC) instead of Kam Drive-in be considered. LCC is located in Pearl City at its western end. This site would better serve Pearl City residents because it is located in Pearl City rather than Aiea. Also, it is located at the western end of Pearl City, so Pearl City residents would be driving against the flow of rush hour traffic to get to and from this transit center.

**Response:** See response to comment #4.

13. Finally, I highly recommend that the City Council finalize its decision on its preferred alternative only after identifying, evaluating, and choosing sites for the Regional Transit Centers, bus on- and off-ramps, and other components of the alternatives. It seems likely at this point that feasible components may be difficult if not impossible to identify and implement given existing constraints and potential environmental and social impacts.

**Response:** See response to comment #3.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

Erin Kilpatrick  
3214 Herbert Street  
Honolulu, HI 96815

October 12, 2000

*Department of Transportation Services official Public Hearing on: the Major Investment Study/Draft Environmental Impact Statement (MIS/SEIS) on the Primary Corridor Transportation Project*

Dear Sir or Madam:

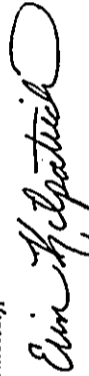
I am a Kapahulu resident. I attend grad. School at UH and I work downtown. I support the concept of the Bus Rapid Transit System for three reasons:

It is the most responsible: The BRT system provides an environmentally healthy alternative by utilizing a hybrid source system. The multi-modal approach to transportation moves us toward a more viable, long-term solution to congestion.

It is the most realistic: The BRT has the greatest chance to begin reducing traffic because it is the most comprehensive and offers the greatest capacity. We have no extra, expendable room on this island for more lanes, more roads, more traffic. The dedicated lane can ensure efficiency, improve commute times and increase ridership thereby reducing traffic.

It is the most respectful: The BRT creates options, access and independence for those whom otherwise have not. It acknowledges the needs and plans of our kupuna whom either cannot or prefer not drive. It provides opportunities and accountability to our children. It respects the busy life-style of every in-town commuter by removing traffic jams, road rage and parking from our list of things to worry about. This is a project for Honolulu to be very proud of.

Thanks for considering my opinion  
Sincerely,

  
Erin Kilpatrick  
Kapahulu Resident

Erin Kilpatrick  
3214 Herbert Street  
Honolulu, HI 96815

October 26, 2000

The Honorable Duke Bainum, Chair  
And Committee Members  
Transportation Committee  
650 South King Street  
Honolulu, Hawaii 96813

Dear Chair Bainum and Committee Members:

RE: Support of Bus Rapid Transit

I am a Kapahulu resident. I attend grad. School at UH and I work downtown. I support the concept of the Bus Rapid Transit System for three reasons:

It is the most responsible: The BRT system provides an environmentally healthy alternative by utilizing a hybrid source system. The multi-modal approach to transportation moves us toward a more viable, long-term solution to congestion.

It is the most realistic: The BRT has the greatest chance to begin reducing traffic because it is the most comprehensive and offers the greatest capacity. We have no extra, expendable room on this island for more lanes, more roads, more traffic. The dedicated lane can ensure efficiency, improve commute times and increase ridership thereby reducing traffic.

It is the most respectful: The BRT creates options, access and independence for those whom otherwise have not. It acknowledges the needs and plans of our kupuna whom either cannot or prefer not drive. It provides opportunities and accountability to our children. It respects the busy life-style of every in-town commuter by removing traffic jams, road rage and parking from our list of things to worry about. This is a project for Honolulu to be very proud of.

Thanks for considering my opinion.

  
Erin Kilpatrick



DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**

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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE WEDER \* MATSUMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD02-00581

Ms. Erin Kilpatrick  
3214 Herbert Street  
Honolulu, Hawaii 96815

Dear Ms. Kilpatrick:

Subject: Primary Corridor Transportation Project (PCTP)

This responds to your October 12, 2000 letter, oral testimony at the October 12, 2000 Public Hearing, and October 26, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. I support the concept of the Bus Rapid Transit System for three reasons.

Response: Thank you for supporting the project.

2. It is the most responsible: The BRT system provides an environmentally healthy alternative by utilizing a hybrid source system. The multi-modal approach to transportation moves us toward a more viable, long-term solution to congestion.

Response: We concur.

3. It is the most realistic: The BRT has the greatest chance to begin reducing traffic because it is the most comprehensive and offers the greatest capacity. We have no extra, expendable room on this island for more lanes, more roads, more traffic. The dedicated lane can ensure efficiency, improve commute times and increase ridership thereby reducing traffic.

Response: We concur.

Ms. Erin Kilpatrick  
Page 2  
November 13, 2002

4. It is the most respectful: The BRT creates options, access and independence for those whom otherwise have not. It acknowledges the needs and plans of our kupuna whom either cannot or prefer not drive. It provides opportunities and accountability to our children. It respects the busy life-style of every in-town commuter by removing traffic jams, road rage and parking from our list of things to worry about. This is a project for Honolulu to be very proud of.

Response: Comment noted.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director



DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
 650 SOUTH KING STREET, 5th FLOOR  
 HONOLULU, HAWAII 96813  
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CHEYL D. SOOH  
 DIRECTOR  
 GEORGE 'KEONI' MIYAJI  
 DEPUTY DIRECTOR

TPD02-00582

November 13, 2002

JEREMY HARRIS  
 MAYOR

Ms. Amy Kimura  
 1310 Helehu Street, Apt. 1002  
 Honolulu, Hawaii 96822

Dear Ms. Kimura:

Subject: Primary Corridor Transportation Project

This is in response to your October 26, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. It is my hope as a taxpayer that the City will do this in a cost-effective, least-disruptive way while preserving as much quality of life for as many residents as possible. It should not provide jobs by building a transportation system that does not alleviate the traffic jams or is overly expensive to maintain. The City can provide jobs by repairing our old sewer system.

Response: The Refined LPA (BRT Alternative) utilizes existing roadways to minimize right-of-way impacts. The Refined LPA preserves and improves the quality of life of Oahu's residents by improving the transportation linkages within the Primary Corridor and between Kapolei and the Urban Core. The purpose of this project is to provide an attractive transportation option to the automobile.

2. Under the No-Build Alternative, why not encourage the multi-occupant cars and discourage single-occupant cars in various ways I did not see in the MIS/DEIS? For example, reduce the taxpayer subsidy of city employee parking stalls in downtown to encourage carpooling or alternate transportation (bus, vanpool, and biking when it becomes safe to do so, perhaps in 5-10 years).

Response: While elected officials can encourage government employees (along with all employees) to use public transportation, they cannot force them to do so. The proposed approach is instead to provide an alternative to the private auto, namely BRT that attracts people because it is faster and more reliable than the existing bus system would be able to be in the future as population grows and roadways become more congested. Another incentive that should be encouraged of all employers who subsidize their employees parking is to offer employees the option of a transit pass.

3. I have many concerns about the Bus Rapid Transit alternative. Tax money should not be gambled on untested, unproven systems. For example, the Aloha Stadium rusing was supposed to be a "palliative," not a problem. In the Dept. of Education, a lot of money was spent on breaking down walls between classrooms for 3-on-2. Later the walls were re-built when 3-on-2 was discarded. I favor testing innovations on a limited trial basis first, to work out bugs and problems before widespread use or commitment of tax money.

RECEIVED  
 11/13/02  
 10:00 AM  
 Mayor's Office

Thank you for the opportunity. My name is Amy Kimura. I am a resident of the Primary Corridor. I am a member of the Board of Directors of the Bus Rapid Transit or Transportation Systems Management. It is to make the commute during rush hours more tolerable for workers and students to downtown, the community colleges, and Ala Moana. It is not aimed at tourists and retirees who can travel during non-peak hours. I am a member of the Board of Directors of the Primary Corridor. There is an average of 1.2 persons per car during peak hours. This is six people in every five cars. If only one car has two occupants, then four of the five cars have one person each. If only one of the four single-occupant cars begins to carry two people, you will have reduced the number of cars on the road by 25%.

It is my hope as a taxpayer that the City will do this in a cost-effective, least-disruptive way while preserving as much quality of life for as many residents as possible. It should not provide jobs by building a transportation system that does not alleviate the traffic jams or is overly expensive to maintain. The City can provide jobs by repairing our old sewer system.

Under the No-Build Alternative, why not encourage the multi-occupant cars and discourage single-occupant cars in various ways I did not see in the MIS/DEIS? For example, reduce the taxpayer subsidy of city employee parking stalls in downtown to encourage carpooling or alternate transportation (bus, vanpool, and biking when it becomes safe to do so, perhaps in 5-10 years). Don't look gift horses in the mouth--years ago the Federal government offered a subsidized road-pricing trial, but then Mayor Zaai refused it so as not to jeopardize the heavy-rail system.

I have many concerns about the Bus Rapid Transit alternative. Tax money should not be gambled on untested, unproven systems. For example, the Aloha Stadium rusing was supposed to be a "palliative," not a problem. In the Dept. of Education a lot of money was spent on breaking down walls between classrooms for 3-on-2. Later the walls were re-built when 3-on-2 was discarded. I favor testing innovations on a limited trial basis first, to work out bugs and problems before widespread use or commitment of tax money.

When I was in Trieste, I saw the power plates embedded in the city streets and wondered what would happen to people walking on them in one of Honolulu's rain storms or in a lightning storm. The untested, touchable embedded power plate was not used in Trieste, Italy, and embedded in the streets of Honolulu. The power plates be tried out on a small scale here with our different climate and lifestyle for a few years before the City commits to a fleet of them.

An interval of two minutes between buses sounds great but ignores the fact that they are not on a schedule. The BRT system is able to maintain that kind of schedule along its route.

I would like to see how the semi-exclusive lanes would work in actual practice--in the median. The BRT lanes using cones should be very enlightening and helpful in decision-making before commitment.

Why would the BRT need to go to Waikiki? How many employees would be riding the bus?

The grand nonstop tress on Kapiolani Boulevard should not be sacrificed. They are beautiful and provide much needed shade. They create a wonderful Hawaiian sense of place.

*Amy Kimura*

Misc. Com. No. 14291

**Response:** The proposed BRT system is based on rider experience of the City's existing bus services, including the recently implemented express bus services that use much of the proposed BRT alignment, forecasts of BRT and local bus ridership using regional travel forecasting models, and input received at hundreds of public outreach meetings. A test without all features of the BRT system in place (i.e., limited stop operations in exclusive and semi-exclusive lanes using low-floor vehicles with level boarding through multiple doors and pre-payment of fares) would be misleading and not a true test of the system. For example, the project proposes to completely reconstruct Dillingham Boulevard through the Kalia area to provide significant pedestrian amenities to facilitate access to BRT stations, as well as building new BRT stations and exclusive lanes in the center of the roadway. Without such major reconstruction, it would not be possible to provide the substantial time savings for transit riders through this corridor that would be offered by the BRT. Most importantly, potential new riders would not likely perceive the demonstration service as permanent and would not be induced to change their travel mode.

4. *When I was in Trieste, I saw the power plectas embedded in the city streets and wondered what would happen to people walking on them in one of Honolulu's rain storms or in a lightning storm. The untested, touchable embedded power plate buses should not only be thoroughly tested in Trieste, Italy, and other cities before Honolulu considers them. They would be tried out on a small scale here with our different climate and lifestyle for a few YEARS before the City commits to a fleet of them.*

**Response:** Thorough testing of any technology will be required before implementation on the Primary Corridor Transportation Project.

5. *An interval of two minutes between buses sounds great but ignores the real world. They may start out that way at the terminus, but cannot remain on that schedule. Only a grade-separated system is able to maintain that kind of schedule along its route.*

**Response:** This comment refers to an operating outcome that does not change the number of vehicles required, the capacity of the system, or its performance. Techniques are available to regulate on-time performance, and the platform length allows for a certain amount of *de facto* platooning that is likely to occur.

6. *I would like to see how the semi-exclusive lanes would work in actual practice -- in the median and as a curb lane. A two-week to one-month demonstration project of the system using cones should be very enlightening and helpful in decision-making before commitment.*

**Response:** See response to comment #3.

7. *Why should the BRT need to go to Waikiki? How many employees would be served during the rush hour? How many of these are already riding the bus?*

**Response:** With a high concentration of jobs, residences and visitor venues in a small area with few access points, Waikiki streets are congested during much of the day. To serve the high level of transit demand a system is proposed that will allow BRT vehicles to by-pass this congestion using bus priority lanes and other techniques. The BRT system will permit transit passengers to board anywhere along the route and complete their journey in Waikiki without having to transfer to a shuttle at Ala Moana Center. Other passengers who boarded buses not along the BRT route could transfer to the BRT at Ala Moana Center or many of the other transit centers and transfer points in the system. With this approach many riders could have a transfer free trip to-and-from Waikiki, whereas with a shuttle bus system everyone would have to transfer at Ala Moana Center.

8. *The grand monkeypod trees on Kapiolani Boulevard should not be sacrificed. They are beautiful and provide much needed shade. They create a wonderful Hawaiian sense of place.*

**Response:** The discussion on tree impacts in the FEIS has been expanded to provide details on the individual tree impacts expected from the project action. Where possible, the project has been redesigned to avoid trees, and most monkeypod trees on Kapiolani Boulevard would not be affected. For example, widening is no longer planned for both sides of the street. Some bus stops were relocated and bus pullouts were strategically placed between existing trees as much as possible to reduce the need to transplant trees. BRT operations were also altered in order to help reduce tree impacts. For example, creating dedicated BRT lanes would often require street widening resulting in tree impacts. In order to limit the amount of street widening, exclusive BRT lanes were eliminated in some areas, and were replaced with mixed-use lanes. Despite extensive efforts, some trees will still have to be relocated or removed to allow for necessary road widening. In particular, about ten monkeypods along Kapiolani Boulevard will be replanted further from the curb. Trees to be moved will be pruned before replanting, but in the case of monkeypods, their canopy is expected to grow back within one year, with full recovery in three to five year's time.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
630 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE KEOU MEYAMOTO  
DEPUTY DIRECTOR

TPD02-00583

November 13, 2002

Mr. Seichi Kimura  
Page 2  
November 13, 2002

4. What the transportation experts have proposed, BRT, reminds me of Taipei City, Taiwan, main bus systems were before the construction of the now MRT railway system. Previously, the situation fronting the Taipei rail station was a nightmare, just a terrible bus situation. But two and a half years ago, when I went to Taiwan, at the hotel near the Taipei rail station, construction of the MRT, I noticed that the situation of the traffic has improved a lot.

Response: Comment noted.

5. Yesterday, I took the Express bus to Waipahu. This has cut the traveling time to go and return, eliminating many of the local stops. But the drawback is they had to stop at many intersections where the traffic signs are.

Response: Comment noted.

6. About three months ago, I saw an article in the Hawaii Hochi newspaper, that Naha City in Okinawa, Japan, have a monorail system, testing their equipment. I suggest that the local engineers look into it before committing themselves into the BRT system.

Response: A grade separated system was rejected at the outset by the public and City Council as being too costly and unsightly. Selection of a Locally Preferred Alternative has already been made.

7. In closing, once again, I am totally against this BRT system, because it will not only compound the traffic congestion as it is now, it will be a nightmare.

Response: Again, thank you for attending the public hearing and expressing your opinion regarding the project.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

Mr. Seichi Kimura  
45-269 Mokulele Place  
Kaneohe, Hawaii 96744

Dear Mr. Kimura:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. I'm totally against this Bus Rapid Transit system concept.

Response: Thank you for attending the public hearing.

2. P.S., you know, incidentally, I have a local bus pass. But, you know, I am totally against this system.

Response: Comment noted.

3. In 1964, when New York City had the World's Fair, I rode the rail from New York City to Montreal. I also rode the rail from Guangzhou, China, to Hong Kong, to Kowloon, Hong Kong. I also rode a train from Chek Lap Kok to Sheung Wan about two and a half years ago in Hong Kong. And in Taiwan, I also rode the train from Taipei, to Kao-Hsiung, to Tai-Chung, to Taipei. And just recently, I went to Japan on a 14-day railway pass. I returned on April 2nd. I spent about four nights in Tokyo city, riding the Yamanote line, the Keihin-Keio line, the Odakyu line and Sobu line.

Response: Thank you for sharing your international public transportation experiences with us.

APR 20 2002

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE "GEO" MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00584

November 13, 2002

20 April 2002

Ms. Cheryl Soon, Director  
Department of Transportation Services  
City & County of Honolulu

Dear Director Soon,

Our growing population, compounded with heavy traffic congestion of our roads, highways, and freeways, definitely poses a daily transportation dilemma. We are now at a point in time where solutions and answers need to be formulated and followed through. If we hesitate to act on these answers and solutions, time will rapidly dissolve these solutions and we will certainly face a much more severe crisis. Often, we regret passing over opportunities offered to us at these pivotal points in life.

The vision of the Bus Rapid Transit is not one that I want to pass over. I believe that it is one of the many steps that we need to take to alleviate some of our problems and concerns pertaining to transportation in Oahu. I will continue to support the Bus Rapid Transit and would like to see it through its completion.

Thank you for your time and attention in this matter.

Sincerely,

Eric Koike, P.E.  
Structural Engineer

D:\User\jsh\BRT.doc

Mr. Eric Koike  
98-611 Nohoalii Street  
Aiea, Hawaii 96701

Dear Mr. Koike:

Subject: Primary Corridor Transportation Project

This responds to your April 20, 2002 letter regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. Our growing population, compounded with heavy traffic congestion of our roads, highways, and freeways, definitely poses a daily transportation dilemma. We are not at a point in time where solutions and answers need to be formulated and followed through. If we hesitate to act on these answers and solutions, time will rapidly dissolve these solutions and we will certainly face a much more severe crisis. Often we regret passing over opportunities offered to us at these pivotal points in life.

Response: Comment noted.

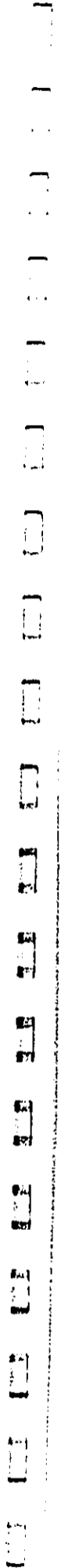
2. The vision of the Bus Rapid Transit is not one that I want to pass over. I believe that it is one of the many steps that we need to take to alleviate some of our problems and concerns pertaining to transportation in Oahu. I will continue to support the Bus Rapid Transit and would like to see it through its completion.

Response: Thank you for supporting the BRT project.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director



DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
PHONE: (808) 522-4279 • FAX: (808) 522-4730 • INTERNET: WWW.CO.HONOLULU.HI.US



JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE KESONGIYAMOTO  
DEPUTY DIRECTOR

MAY 8 2002

MELODY M. KUBO  
1234 ALEXANDER STREET, NO. 108  
HONOLULU, HI 96826  
PHONE/FAX: (808) 855-0835  
E-MAIL: mmkubo@aol.com

Good morning:

I am Melody Kubo and I am testifying as a resident of McCully and a student at the William S. Richardson School of Law at the University of Hawai'i.

I live, go to school, and work in the "primary urban corridor" that will be most affected by the proposed bus rapid transit system.

I am a strong supporter of developing feasible rapid transit alternatives. I attended college in Boston, Massachusetts. Boston's transit system is extensive, and incorporates diverse elements, including buses, an extensive subway system, commuter trains, transit centers and park and ride lots. Although my college was located in a suburb of Boston, I could get into Boston in less than thirty minutes on the "T" (subway), and from there I could easily get to Logan Airport or catch a commuter train to visit my cousin in New Jersey. Because Boston's integrated rapid transit system was so convenient and accessible, I did not need a car. In fact, I did not own or even drive a car during my three years in Boston, and, amazingly, I did not even miss it!

Based on my own experiences, as well as those of others who similarly adapted to communities with excellent rapid transit systems, I am confident that, if the city's rapid transit system is convenient and accessible, people will use it. I will use it. And it will be a success.

I applaud the city for its efforts to invite dialogue to create a bold, visionary solution to address Hawai'i's traffic problems. The BRT proposal is unusual in its apparent emphasis on, and demonstrated commitment to, the early and active involvement of interested community members in the planning and design process. That the City Department of Transportation Services and its contractors are serious about involving the community is clearly demonstrated by the changes that were made to the In-Town BRT route which necessitated this public hearing.

I am here to urge you to continue moving forward with the planning process. Our traffic problem is getting worse, not better. Honolulu needs a new transit alternative. Please let the development process continue without delay.

Sincerely,

Melody M. Kubo

TPD5/02-01857R

November 13, 2002

Ms. Melody M. Kubo  
1234 Alexander Street, No. 108  
Honolulu, Hawaii 96826

Dear Ms. Kubo:

Subject: Primary Corridor Transportation Project

This is in response to your April 20, 2002 written testimony regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. I am a strong supporter of developing feasible rapid transit alternatives. I attended college in Boston, Massachusetts. Boston's transit system is extensive, and incorporates diverse elements, including buses, an extensive subway system, commuter trains, transit centers and park and ride lots. Although my college was located in a suburb of Boston, I could get into Boston in less than 30 minutes on the "T" (subway), and from there I could easily get to Logan Airport or catch a commuter train to visit my cousin in New Jersey. Because Boston's integrated rapid transit system was so convenient and accessible, I did not need a car. In fact, I did not own or even drive a car during my three years in Boston, and, amazingly, I did not even miss it!

Response: Thank you for sharing your experience with the Boston public transportation system and for supporting a rapid transit alternative.

2. Based on my own experiences, as well as those of others who similarly adapted to communities with excellent rapid transit systems, I am confident that, if the city's rapid transit system is convenient and accessible, people will use it. I will use it. And it will be a success.

Response: We appreciate you supporting the project.

DEPARTMENT OF TRANSPORTATION SERVICES  
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CHERYL D. SOON  
DIRECTOR  
GEORGE MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00585

November 13, 2002

Mr. Bill Lane  
c/o DHX  
5 Sand Island Road, Box 125  
Honolulu, Hawaii 96816

Dear Mr. Lane:

Subject: Primary Corridor Transportation Project

This is in response to your comment on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS). At the November 14, 2000 Special Transportation Committee Meeting you commented on the needs of freight. Please see our response below.

Sincerely,

CHERYL D. SOON  
Director

Sincerely,

CHERYL D. SOON  
Director

Ms. Melody M. Kubo  
Page 2  
November 13, 2002

3. I applaud the city for its efforts to invite dialogue to create a bold, visionary solution to address Hawaii's traffic problems. The BRT proposal is unusual in its apparent emphasis on, and demonstrated commitment to, the early and active involvement of interested community members in the planning and design process. That the City Department of Transportation Services and its contractors are serious about involving the community is clearly demonstrated by the changes that were made to the In-Town BRT route which necessitated this public hearing, changes that were suggested by the community work groups.

Response: We appreciate you attending the public hearing, supporting the project, and the compliment regarding the community involvement process.

4. I am here to urge you to continue moving forward with the planning process. Our traffic problem is getting worse, not better. Honolulu needs a new transit alternative. Please let the development process continue without delay.

Response: Comment noted.

We appreciate your interest in the project.

Response: In the Public Outreach for the Project, the City established a Working Group (WG) for the Waikiki area composed of representatives from the hotels, retail and service industries, commercial passenger and freight carriers, and residents. A detailed study of passenger and freight loading activities was performed and reviewed with the Waikiki WG. Discussions with this Working Group led to revisions in the Proposed Project that resulted in no appreciable loss of on-street loading space along the streets affected by the BRT. This was achieved by allowing freight carriers to use the makal BRT shared lane during legal delivery hours (10 pm to 9 am); the BRT would simply pass around a stopped loading truck by using the adjacent traffic lane.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.



DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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TELEPHONE: (808) 523-4239 • FAX: (808) 523-1720 • INTERNET: www.cc.hawaii.gov



JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE "KEOU" MIYAMOTO  
DEPUTY DIRECTOR

TPD002-00586

November 12, 2002

Mr. David Laughlin

Subject: Primary Corridor Transportation Project

This responds to the comment in your testimony at the October 12, 2000 formal Public Hearing regarding the MIS/DEIS:

*"And I feel that the dedicated bus lanes and the zipper lane has been a great help to the system. And I think if we improve the system with the park-and-ride lots would be a great help."*

Response: Additional park-and-ride facilities are being planned at various locations on Oahu, some of which will be provided by the Refined LPA (BRT Alternative).

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE "KEOU" MIYAMOTO  
DEPUTY DIRECTOR

TPD002-00587

November 13, 2002

Ms. Kathy Leong  
c/o Wilson Okamoto & Associates, Inc.  
1907 S. Beretania Street, 4<sup>th</sup> Floor  
Honolulu, Hawaii 96826

Dear Ms. Leong:

Subject: Primary Corridor Transportation Project

This responds to the comment you made on the MIS/DEIS. In your testimony at the November 14, 2000 Special Transportation Committee Meeting, you supported the In-Town BRT as the Locally Preferred Alternative (LPA). Thank you for supporting the project.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director



DEPARTMENT OF TRANSPORTATION SERVICES  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE WEDGE, MPT/MOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD02-00609

Mr. Paul T. Leong  
45-630 Hinamoe Loop  
Kaneohe, Hawaii 96744

Dear Mr. Leong:

Subject: Primary Corridor Transportation Project

This responds to your comment on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS). At the November 14, 2000 Transportation Committee meeting, you supported selecting the Bus Rapid Transit as the Locally Preferred Alternative. Thank you for supporting the project.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

**HONOLULU NEEDS A TRANSPORTATION SYSTEM THAT BENEFITS ALL!!!**  
Testimony of Randolph F. Leong  
10-26-00 OahuTrans2K Hearing  
Oct 23 3 58 PM '00  
CITY CLERK  
HONOLULU, HAWAII

I. OVERVIEW.

I agree that we must do something to reduce traffic congestion and road-travel time in Honolulu. In our busy lives, TIME has become our most important commodity and we are wasting far too much of it getting from one place to another, especially during the rush hours.

Everyone appreciates that the City Council and the Department of Transportation Services are putting much effort and time into solving this growing problem, and giving us, the public, a chance to express our concerns.

I've looked through the MIS/DEIS Report and attended the City Council public hearing on October 5, 2000. My conclusion: none of the three alternatives offered in the current MIS/DEIS is the answer to Honolulu's transportation problem. My opinions, briefly, on each alternative are:

Alternative 1 - the "No Build" alternative, is not an option. We must be pro-active in finding a long-term solution to our traffic problem. We cannot continue doing the same thing and expect different results.

Alternative 2 - the Transportation Systems Management ("TMS") alternative is not the long-term solution but a pared-down version of it may serve as an interim solution until we do find the answer(s).

Alternative 3 - the Bus Rapid Transit ("BRT") alternative is much too narrow in its focus and solves the transportation problem for only a small segment of our population. Going down this path would be a fatal mistake. Part II focuses on my reasons for this opinion.

II. WHY BRT IS NOT THE ANSWER.

BRT is obviously on the "inside track" in this evaluation process. I believe that it would be a serious mistake to select it, however, because it only benefits a small minority of our road travelers: those who ride use public transportation and high-occupancy vehicles (HOVs). We cannot afford to spend so much (I believe the great majority) of our transportation funds to benefit so few (I believe 8% to 10% of our road users).

A. BRT does not (and will never) serve the needs of the vast majority of our population.

BRT proponents believe that "an efficient transit system would encourage people to use transit rather than drive private vehicles". This "build it and they will come" philosophy, will be true to some extent, but I am not convinced that this will happen in sufficient numbers to solve our overall traffic problem. My skepticism is based on my belief that many citizens have valid

<sup>1</sup> Section 4.0 of the MIS/DEIS Report- Transportation Impacts-Overview, page 2 of 27.

reasons/needs to drive a privately-owned vehicle ("POV"), commercial vehicle, or public-utility vehicle to, or during work, including: taxi drivers, tour drivers, salespersons, delivery people, contractors, repair people, parents that need to pickup/drop off children for school, daycare, practices, doctor's appointments, women who work nights, etc.. In addition to these, there are many who may not have such valid reasons/needs, but have an "addition" for, or a "love affair" with their cars, and will not give it up regardless of the cost.

An interesting suggestion made at the October 5, 2000 Public Hearing before Chairman Duke Babinum and Councilman Steve Holmes, was that all government workers should be required to commute to their jobs by whatever transit system they put into place. How many government workers will be willing and able to utilize BRT daily?

But why question only government workers? To get a true perspective on this issue, let's each ask ourselves these two questions:

Q/ "Would I be willing and able to utilize the BRT as my daily means of commuting to work?"

Q/ "On those occasions that I do have to drive around town for business purposes, or to run errands during or after work, would I want to depend on the BRT system for these purposes?"

I know what my answers are; and, I think that I'm in the vast majority.

B. While solving the problem of a small minority, BRT will in fact, make the problem for the majority of our road travelers much worse!

It is my understanding that proponents of BRT predict that ridership on public transportation/HOVs will increase from the current 8% to 10%, to 15% to 20% with BRT.

Q/ "What about the other 80% to 85% of the population?"

A/ The answer, I believe, can be found in Sec. 4 of the EIS/DEIS Report addressing Transportation Impacts. In that section, it is admitted that BRT will make the traffic situation worse for this majority... those who drive POVs, commercial vehicles (cars, vans, trucks, etc.), public-utility vehicles (taxis, limos, tour buses, vans, trolleys, etc.), and other types of transportation (motorcycles, mopeds, and electric GEM vehicles).

Real-world examples of how BRT would likely worsen traffic are the road-construction projects going on around town right now. Take a drive down one of those roadways where just one lane is closed-off for construction. The road space (even if it's just 1 lane) taken up by the construction, even during off-peak times, causes tremendous backups and delays. The proposed

<sup>2</sup> Section 4.0 of the MIS/DEIS Report- Transportation Impacts-Overview, page 2 of 27.

BRT system will reduce road space by 2 lanes, for the rest of traffic in the same way, but on an everyday basis and at all hours... even during peak rush hours.

C. Let's seek a solution that solves the traffic problem for EVERYONE.

I submit that the City Council ask the Department of Transportation Services to take another look at the problem, and to find a much broader solution; one that will solve the transportation problems for everyone... not just for the users of public transportation, a small minority of the road-using public.

### III. A POSSIBLE SOLUTION: A DUAL MODE SYSTEM

#### A. Dualmode systems in general.

A possible solution may be one incorporating the concept and technology of a dualmode system. Dualmode transportation concepts feature vehicles that can be driven on conventional streets and can also operate on a high-speed automated guideway under computer control. A website that give an overview of various proposed dualmode systems is:

<http://faculty.washington.edu/~jbs/itrans/dualmode.htm>

Unfortunately, there is no dualmode system currently in operation anywhere in the world. There is one system, however, that is currently being tested, and has fast been attracting attention: the Rapid Urban Flexible ("RUF") system.

#### B. The RUF System

The RUF system was created by Palle R. Jensen, a Danish inventor. A prototype car and track has been built, and is being tested just outside of Ballerup, Denmark. Details, photos and renderings of that system can be found at the following address:

[www.RUF.dk](http://www.RUF.dk)

A consortium of public agencies (Danish ministries of Energy, Environment & Education) and private enterprises (multinational corporations including Siemens, Hawker, Mannesmann, and several Danish firms) is sponsoring RUF. Quite recently, Mr. Jensen was invited to speak about RUF at a forum in Aspen, Colorado, on "New Visions in Transportation" presented by the Advanced Transit Association and the National Society of Professional Engineers. A description of the forum held on October 18-19, 2000, and the list of speakers, can be found at the following address:

[www.nvt2000.com](http://www.nvt2000.com)

The best way to review the Dualmode alternative would be to go to the above websites, but

for the benefit of those not on the internet, following is a synopsis of the RUF system, which may or may not be the best Dualmode system, or, the best system for Honolulu.

A RUF system, which would essentially be made up of three components: (1) the guideway; (2) electric RUF vehicles; and (3) stations.

(1) **The Guideway.** This would be a light, single rail (i.e. monorail) that runs along the major highway corridors. For example, for the Oahu Trans2K project, a guideway could run along the H-1 freeway from Kapolei, through Pearl City, to Waikiki and the University of Hawaii campus, and along the H-2 freeway from Miliama to Pearl City, where it could link-up with the guideway running along the H-1. Mr. Palle R. Jensen estimates the cost of the guideway to be \$7 million per bi-directional mile. The guideway can be at street level, underground, in an above-ground/underwater tube, or elevated above ground.

(2) **Electric Vehicles.** The two types of RUF vehicles have great flexibility and wide appeal. They can drive on streets like regular automobiles and vans for short trips (30-mi range) and accelerate up to 48 mph. For longer trips and commuting, these vehicles can drive up onto the guideway.

(a) **RUF vehicles (2- and 4-passenger vehicles)** can be privately owned, commercially owned, or publicly owned. Private owners can customize their RUF vehicles to their heart's content to reflect their individual lifestyle or status. Car rental firms can rent RUF vehicles to tourists or to anyone in need of a vehicle for a few days.

(b) **MAXI-RUFs (10-passenger van-like vehicles)** can be used in a number of ways: (1) as public buses with fixed routes and timetables; (2) as jimeys, with semi-fixed routes and timetables; (3) as VanPool vehicles, with customized routes and timetables; (4) as public-utility vehicles, such as limos, tour buses, etc.; (5) as school buses, especially for private schools or to transport teams, clubs, etc.; and (6) as commercial vans for deliveries, repairs, etc.

(3) **Stations.** Stations are where RUF vehicles can get on and off the guideway. They can be built at 3-mile intervals because of the 30-mile range of the RUF vehicles, can pickup and drop off passengers within a relatively-wide radius of the stations. What is a very attractive feature of the RUF system is that the "trains" of RUF vehicles traveling on the guideway, do not stop to allow individual vehicles on or off of the guideway. The train continues to move, slowing down as it approaches the station, and then speeds up after the transfers on and off are made. This feature allows an average speed of about 60 mph once a vehicle gets onto the guideway, making it a truly "rapid" transit.

#### C. Why a Dualmode system is so attractive

Dualmode systems, in general, show promise mainly because they will have wide appeal to everyone: the users of public transportation, the POV drivers, the environmentalists, and the

taxpayers. For specific characteristics, the RUF system will be used as an example.

#### 1. Commuters and Other Road Users. Commuters (public and private) will like it for many reasons, including:

- (1) You can travel door-to-door.
- (2) Your travel time is shorter (see charts on page 6).
- (3) No transfers.
- (4) No standing in the wind and rain (or in the dark) for a bus.

With a private RUF vehicle one gets the added benefits of:

- (1) You can make routine stops (pick up kids, groceries, laundry, etc.) without the hassle of getting off and back onto the mass-transit vehicle.
- (2) You can carry and store your luggage, books, files, groceries etc. without hassle.
- (3) You have the convenience of running out during the workday to run errands away from your workplace.
- (4) You can own a vehicle that reflects your personality, lifestyle, status, etc.
- (5) You go straight to your destination without stops to pickup other passengers.
- (6) You have security (especially at night).
- (7) You have privacy and freedom to use the time and space as you desire.

Once on the guideway, one gets the best of both worlds:

- (1) You're on "auto pilot" and you can make more productive use of your time (e.g. read, talk on the telephone, surf the internet, watch TV, or even nap, meditate, etc)
- (2) You continue moving at a high rate... upwards of 75 mph (@60 mph average), without stopping, until you exit from the guideway.
- (3) You form trains with other RUF vehicles to reduce air resistance and get maximum efficiency.
- (4) You still have the security and privacy of a POV.

2. **Environmentalists.** Environmentalists will like it because it is electric. This means less noise, air pollution, greater fuel efficiency, and less wasted time sitting in traffic.

3. **Taxpayers.** Taxpayers will like it because, in the case of the RUF system, building the guideway is much less expensive than a light-rail (estimates given are \$7 million per mile for the RUF guideway) AND, much of the cost will be borne by the commuters, who will be buying the private RUF vehicles themselves, and paying their fares/fees (toll charges on a user-basis, unlike the freeways).

IV. CONCLUSION.

Honolulu needs a transportation system that solves the traffic problem for everyone, not just a small minority. BRT is not the answer. A dualmode system, like the RUF system, seems to offer a better, broader solution.

I don't know the final answer(s) but do know that now is the time to do our "comparison shopping". We are at a critical crossroads in history; the decision made here will affect our lives, our island, our state, for decades to come. So let's not rush into "blowing our wad" on a system that will cause regrets for decades to come. I submit that we look at other alternatives.

If the Council is interested, I have a power-point presentation and a few simple brochure on the RUF system that Mr. Jensen sent to me. I do not know Mr. Jensen, having only contacted him for the first time in September through email when I learned about the OahuTrans2K consortium. I am not representing anyone, and have no affiliation with Mr. Jensen or his consortium. Also, I live in Hawaii Kai and am not directly affected by the BRT plan. I have done this as a concerned citizen with a deep love for Hawaii, hoping that BRT is not adopted because it quite simply, IS NOT THE TRAFFIC SOLUTION FOR HONOLULU.

Mahalo and Ahui bou.

*Randolph F. Leong*  
 Randolph F. Leong

P.S. I am also attaching a rendering of a MAX-RUF "train", and an article on RUF from *EV World*.

\* transfer times are unknown and the number of transfers will vary from route-to-route  
 \*\* these RUF estimated times are based on 60 mph average speed on the guideway which can run along the freeway routes, and 20 mph average speed once the electric vehicles leaves the guideway and drives on the streets.  
 NOTE: The time it takes to get from homes to stations and from stations to final destinations is not included in these calculations. The RUF system would generally be superior in this regard because in most cases, passengers get door-to-door transportation. The walking or shuttling to-and-from stations that would be required in the BRT system.

Dramatic Savings in Commute Time  
 A rough estimation of rush-hour commute times today for POVs, and, in 2025 using the BRT and RUF systems is as follows:

Approx. Distances	POV (yr. 2000)	BRT (yr. 2025)	RUF (yr. 2025)
Kapolei to Downtown	1 hr. 15 min.	35 minutes + transfer time	26 minutes**
Mililani to Downtown	1 hr. 15 min.	36 minutes + transfer time	25 minutes**
Pearridge to Downtown	50 min.	17 minutes + transfer time	17 minutes**
Kapolei to UH-Manoa	1 hr. 25 min.	48 minutes + transfer time	29 minutes**
Mililani to UH-Manoa	1 hr. 25 min.	49 minutes + transfer time	28 minutes**
Pearridge to UH-Manoa	1 hr.	30 minutes + transfer time	20 minutes**
Kapolei to Honolulu Zoo	1 hr. 40 min.	53 minutes + transfer time	41 minutes**
Mililani to Honolulu Zoo	1 hr. 40 min.	54 minutes + transfer time	40 minutes**
Pearridge to Hon. Zoo	1 hr. 15 min.	35 minutes + transfer time	32 minutes**

# RUF Idea On A Rail

By Bill Moore, Editor, EVWorld

[Originally posted at [EVWorld](#), reposted with permission]

The RUF idea is you drive your short-range (30 mi.) electric vehicle to the nearest monorail outcrop. A electronic guide system buried under the roadway deftly steers your car onto the monorail. Once you're on the rail, the car's automatic drive system engages and you are whisked up more than 12 feet onto the main rail line, merging safely with other traffic. Within a minute you are racing -- hands-free -- towards the center of town at 60 miles per hour as part of a "train" of six or seven other RUF-equipped EVs.

Until this past June, the Rapid Urban Flexible EV concept was only... well a concept. But this summer RUF took a significant step forward when a prototype "mule" rolled onto a 24 meter-long test track outside of Ballerup, Denmark. Looking nothing like the sleek 1998 concept mockup that gave physical form to the idea or the more conventional-looking Z-9 and Z-11 concept cars, the RUF mechanical test bed sports a clear plastic canopy and a heavy steel tube frame. It boasts eight wheels: four normal road wheels and four smaller track wheels hidden discretely along either side of the vehicle's centerline. There are also separate steel drive wheels that propel the vehicle along the guide rail.

Originally conceived of more than a decade ago, the RUF system is the brainchild of Danish inventor Palle Jensen. Since the concept was first presented in 1988, Jensen has successfully garnered the support of a number of major sponsors including three Danish ministries (Energy, Environment, Education) and a number of multinational corporations including Siemens, Hawker and Mannesmann, as well as a bevy

<http://faculty.washington.edu/jbs/trans/evworldruf.htm>



Rapid Urban Flexible concept EV combines flexibility of individual automobile with monorail train concept. Prototype "mule" passes first test in June, 2000.

RUF, LLC, Mich. Site

## Additional Photos

[Prototype test vehicle on monorail track](#)

[Prototype test mule on monorail track](#)

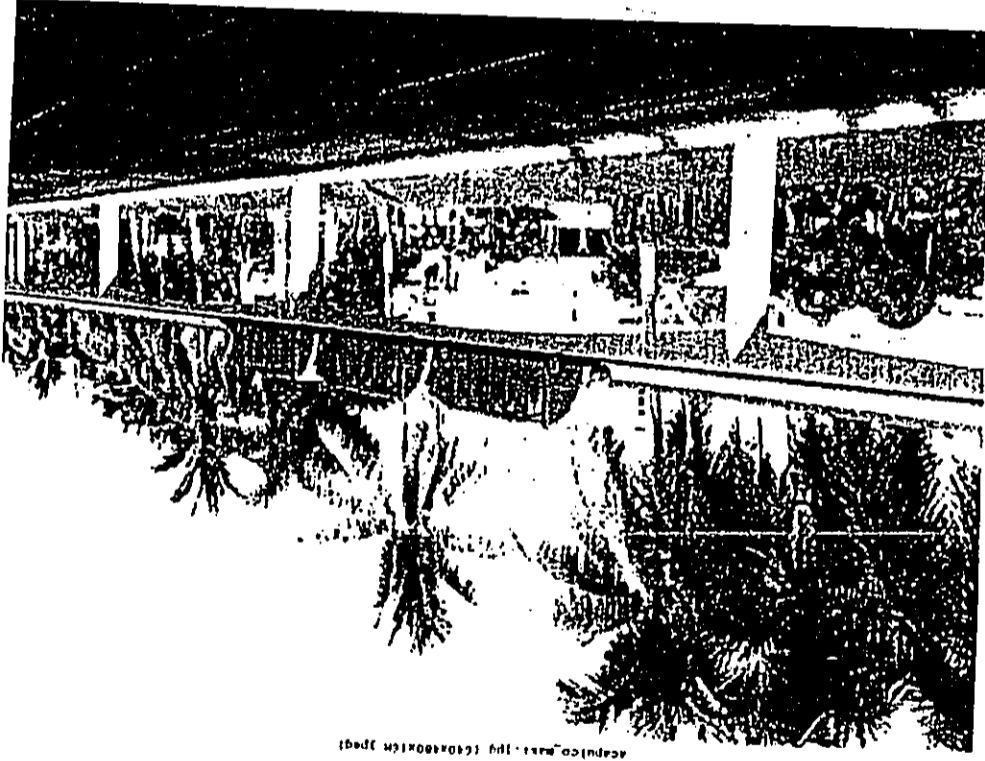
[Prototype test mule](#)

[Z11 concept vehicle](#)

[Z9 concept vehicle](#)

[Original RUF mockup vehicle](#)

[RUF prototype monorail close-up](#)



republican.mast.jpg (40x400x1000)



of Danish firms.

What Jensen proposed and is finally seeing take shape is an electric vehicle that has a v-shaped channel down its centerline. The vehicle drives onto the guide rail where its four track wheels rest on supporting side tracks. The main road wheels no longer make contact with the ground. A pair of drive wheels firmly clasp the guide rail, which is also "hot" and provides the electricity to drive the test bed, as well as recharge its battery. A rail brake stops the vehicle.

Jensen and his collaborators propose to create a system of elevated guide ways on which thousands of RUF EVs, both publicly and/or privately owned would move commuters quickly 4 meters above street level. Essentially they envision a combination of monorail train and autonomous electric vehicles which can be driven up to 30 miles before needing to be recharged, either by parking on a side track or by being plugged into a charger similar to a conventional EV.

The goal of the RUF system is to reduce congestion while overcoming some of the more nagging problems confronting EVs such as short range and long recharge times.

According to RUF International's calculations, a single highway lane can accommodate a maximum of 2,000 cars per hour per lane. By contrast, they say the RUF system could handle as many as 3,600 vehicles per hour per rail. In addition, four rails can be installed in the same space as three highway lanes, making it possible to move many more passengers much more efficiently than our current system and with far less pollution and wasted energy.

Jensen also proposes what he calls the Maxi-RUF, a ten-passenger vehicle that would use the same track system, sort of electric mini-buses. As might be imagined, the RUF system will also be heavily dependent on smart vehicle technology that

<http://faculty.washington.edu/jos/trans/evworldruf.htm>

9/16/00

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Jensen also proposes what he calls the Maxi-RUF, a ten-passenger vehicle that would use the same track system, sort of electric mini-buses. As might be imagined, the RUF system will also be heavily dependent on smart vehicle technology that automatically routes the vehicle and directs its switching to other tracks. The driver/user simply programs into the car where it is they want to go and the computer handles the rest. It will even communicate with other vehicles to see if they are going to the same destination and automatically form "trains" to increase traffic density and reduce energy usage by "drafting".

Just as our current highway system is used for both passengers and cargo, automated cargo carriers can also use the RUF system. Shipments could be dispatched from warehouses and dropped at distribution points where EV "tractors" could pick them up for deliveries to outlying stores and shops.

The roll-out of the test bed in Ballerup doesn't guarantee the RUF system will every reach deployment, but the fact that some very serious "players" are participating in the experiment bodes well.

Rapid Urban Flexible concept EV combines flexibility of individual automobile with monorail train concept. Prototype "mule" passes first test in June, 2000.

Rapid Urban Flexible concept EV combines flexibility of individual automobile with monorail train concept. Prototype "mule" passes first test in June, 2000.

[www.RUF.DK](http://www.RUF.DK)

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

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TPD02-00588

November 13, 2002

Mr. Randolph F. Leong  
900 Fort Street Mall, Suite 1200  
Honolulu, Hawaii 96813

Dear Mr. Leong:

Subject: Primary Corridor Transportation Project

This is in response to your October 26, 2000 letter and your oral testimony at the October 26, 2000 Special Transportation Committee Meeting regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. I've looked through the MIS/DEIS Report and attended the City Council public hearing on October 5, 2000. My conclusion: none of the three alternatives offered in the current MIS/DEIS is the answer to Honolulu's transportation problem. *Alternative 1 - "No Biker" alternative, is not an option. We must be proactive in finding a long-term solution to our traffic problem. We cannot continue doing the same thing and expect different results. Alternative 2 - the Transportation Systems Management (TMS) alternative is not the long-term solution but a pared-down version of it may serve as an interim solution until we do find the answer(s). Alternative 3 - the Bus Rapid Transit (BRT) alternative is much too narrow in its focus and solves the transportation problem for only a small segment of our population. Going down this path would be a fatal mistake.*

**Response:** The transit alternatives analyzed in the Primary Corridor Transportation Project are intended to be part of a comprehensive, multi-modal solution to the future transportation needs of Oahu. Highway, bicycle, pedestrian and other modal improvements along with the Refined LPA are included in the island's long-range transportation plan, TOP 2025 prepared by OMPFO.

2. BRT is obviously on the "inside track" in this evaluation process. I believe that it would be a serious mistake to select it, however, because it only benefits a small minority of our road travelers: those who ride use public transportation and high-occupancy vehicles (HOVs). We cannot afford to spend so much (I believe the great majority) of our transportation funds to benefit so few (I believe 8% to 10% of our road users).

**Response:** See response to comment #1.

3. BRT proponents believe that "an efficient transit system would encourage people to use transit rather than drive private vehicles". This "build it and they will come" philosophy, will be true to some extent, but I am not convinced that this will happen in sufficient numbers to solve our overall traffic problem. My skepticism is based on my belief that many citizens have valid reasons/needs to drive a privately owned vehicle (POV), commercial vehicle, or public-utility vehicle to, or during work, including: taxi drivers, tour drivers, salespersons, delivery people, contractors, repair people, parents that need to pickup/drop off children for school, daycare, practices, doctor's

Mr. Randolph Leong  
Page 2  
November 13, 2002

*appointments, women who work nights, etc. In addition to these, there are many who may not have such valid reasons/needs, but have an "addiction" for, or a "love affair" with their cars, and will not give it up regardless of the cost.*

**Response:** We agree there are some people whose transportation needs are best served by a private automobile. However, the goal of the Refined LPA is to provide an attractive, affordable, dependable transportation option to the private automobile. The Refined LPA increases the people carrying capacity throughout the Primary Corridor and preserves and improves the quality of life of Oahu's residents by improving transportation linkages within the Primary Corridor and between Kapolei and the Urban Core.

4. *An interesting suggestion made at the October 5, 2000 Public Hearing before Chairman Duke Bainum and Councilman Steve Holmes, was that all government workers should be required to commute to their jobs by whatever transit system they put into place. How many government workers will be willing and able to utilize BRT daily?*

**Response:** Government workers will have the freedom of choice along with all other workers on whether to use the proposed transit system.

5. *But why question only government workers? To get a true perspective on this issue, let's each ask ourselves these two questions: C/ "Would I be willing and able to utilize the BRT as my daily means of commuting to work?" C/ "On those occasions that I do have to drive around town for business purposes, or to run errands during or after work, would I want to depend on the BRT system for these purposes?"*

**Response:** The Primary Corridor Transportation Project (PCTP) is the result of public involvement. Public involvement in the project began in 1998, at the very beginning of the planning process, and remains ongoing. Input from the public was critical in developing and evaluating alternative transportation solutions. The development and refinement of the three alternatives discussed in the MIS/DEIS was the result of public input.

In addition to four rounds of Oahu Trans 2K public workshops attended by a total of 1,250 individuals, meetings were held with more than 100 governmental agencies, elected officials, businesses, and business, community and civic organizations. The public also had the opportunity to provide input on the various alternatives at a series of four City Council Transportation Committee Meetings prior to selection of the Locally Preferred Alternative (LPA).

The public was given an opportunity to comment on the Environmental Impact Statement Preparation Notice (EISP/N) and the Notice of Intent to Prepare an EIS (NOI). The public provided comments on the MIS/DEIS during a 45-day review period. These comments have now been addressed. The availability of the final EIS will be broadly announced.

Even after the NEPA process has concluded and the ROD has been issued, public involvement will continue in many areas, such as transit centers, transit stops, joint development, streetscapes, landscaping, street tree master plan, station location and design studies, aesthetic design of vehicles, ITS and particulars of the ticketing system.

6. *It is my understanding that proponents of BRT predict that ridership on public transportation/HOVs will increase from the current 8% to 10%, to 15% to 20% with BRT. C/ What about the other 80% to 85% of the population? A/ The answer, I believe, can be found in Sec. 4 of the*

EIS/DEIS Report addressing Transportation Impacts. In that section, it is admitted that BRT will make the traffic situation worse for this majority... those who drive POVs, commercial vehicles (cars, vans, trucks, etc.), public utility vehicles (taxis, limos, four buses, vans, trailers, etc.), and other types of transportation (motorcycles, mopeds, and electric GEM vehicles).

Response: The goal of the Refined LPA is to provide an attractive, affordable, dependable transportation option to the private automobile. The Refined LPA increases the people carrying capacity throughout the Primary Corridor and preserves and improves the quality of life of Oahu's residents by improving transportation linkages within the Primary Corridor and between Kapolei and the Urban Core. As documented in Chapter 4 of the FEIS, congestion will be less for motorists as well as transit riders with the Refined LPA compared to the No-Build and TSM Alternatives.

7. I submit that the City Council ask the Department of Transportation Services to take another look at the problem, and to find a much broader solution; one that will solve the transportation problems for everyone - not just for the users of public transportation, a small minority of the road-using public.

Response: See response to comment #1.

8. A possible solution may be one incorporating the concept and technology of a dualmode system. Dualmode transportation concepts feature vehicles that can be driven on conventional streets and can also operate on a high-speed automated guideway under computer control. A website that gives an overview of various proposed dualmode systems is:

<http://faculty.washington.edu/~jps/transdualmode.htm>. Unfortunately, there is no dualmode system currently in operation anywhere in the world. There is one system, however, that is currently being tested, and has fast been attracting attention: the Rapid Urban Flexible (RUF) system.

The RUF system was created by Palle R. Jensen, a Danish inventor. A prototype car and track has been built, and is being tested just outside of Ballerup, Denmark. Details, photos and renderings of that system can be found at the following address: [www.ruf.dk](http://www.ruf.dk).

A consortium of public agencies (Danish ministries of Energy, Environment & Education) and private enterprises (multinational corporations including Siemens, Hewlett, Mannesmann, and several Danish firms) is sponsoring RUF. Quite recently, Mr. Jensen was invited to speak about RUF at a forum in Aspen, Colorado, on "New Visions in Transportation", presented by the Advanced Transit Association and the National Society of Professional Engineers. A description of the forum held on October 18-19, 2000, and the list of speakers, can be found at the following address: [www.nst2000.com](http://www.nst2000.com).

(2) Electric Vehicles. The two types of RUF vehicles have great flexibility and wide appeal. They can drive on streets like regular automobiles and vans for short trips (30-mi range) and accelerate up to 48 mph. For longer trips and commuting, these vehicles can drive up onto the guideway. RUF vehicles (2- and 4-passenger vehicles)...MAXI-RUFs (1-passenger van-like vehicles).

(3) Stations are where RUF vehicles can get on and off the guideway. They can be built at 3-mile intervals because of the 30-mile range of the RUF vehicles, can pickup and drop off passengers within a relatively wide radius of the stations. What is a very attractive feature of the RUF system is that the "trains" of RUF vehicles traveling on the guideway, do not stop to allow individual

vehicles on or off of the guideway. The train continues to move, slowing down as it approaches the station, and then speeds up after the transfers on and off are made. This feature allows an average speed of about 60 mph once a vehicle gets onto the guideway, making it a truly rapid transit.

Dualmode systems, in general, show promise because they will have wide appeal to everyone: the users of public transportation, the POV drivers, the environmentalists, and the taxpayers.

Response: Thank you for this information. The RUF system information on the Website shows that this concept is at a very preliminary stage of development. It is not detailed enough to determine the exact power infrastructure, however it is clear that the electronic transportation mode requires new, dedicated, non-flexible guide beam consisting of a rail on an I-beam, even if it is routed along existing highways. The I-beam is surrounded by steel plates and the upper part is covered by fiber concrete. This is a semi-permanent guideway that cannot be shared with other modes of transportation. If at grade, the guide beam would not allow pedestrians and other traffic to cross it. If elevated, it would block views.

The RUF system does not meet many of the project technology requirements for no dedicated right-of-way since it requires a guideway. It appears incapable of being re-routed around blockages, the guideway could not be shared with other vehicles, and it does not meet the criterion that the technology be service proven or close to service proven.

9. A RUF system, which would essentially be made up of three components: (1) the guideway; (2) electric RUF vehicles; and (3) stations. (1) The Guideway. This would be a light, single rail (i.e., monorail) that runs along the major highway corridors. For example, for the Oahu Trans 2K project, a guideway could run along the H-1 Freeway from Kapolei, through Pearl City, to Waikiki and the University of Hawaii campus, and along the H-2 freeway from Mililani to Pearl City, where it would link-up with the guideway running along the H-1. Mr. Palle R. Jensen estimates the cost of the guideway to be \$7 million per bi-directional mile. The guideway can be at street level, underground, in an above-ground/water tube, or elevated above ground.

Response: The project established criteria for technology evaluation. At least four of these criteria cannot be met with a RUF system:

1. Selected technologies must not require a new dedicated ROW. RUF would require a new guideway or right-of-way, even if it was to be built along the major highway corridors.
2. Selected technologies must have the capability to be re-routed around blockages. RUF guideway could not be re-routed without substantial re-construction.
3. Selected technologies must be in an advanced stage of development. RUF systems have yet to be demonstrated.
4. Selected technologies must be at-grade not elevated. The RUF would have to be grade-separated or it would violate another criteria, that is that it be possible to cross the technology on foot or with other vehicles.

10. Honolulu needs a transportation system that solves the traffic problem for everyone, not just a small minority. BRT is not the answer. A dualmode system, like the RUF system, seems to offer a better, broader solution.

Response: See response to comment #8.



11. As far as the endurance, the durability of the impact is gonna go on for generations. And that's how I see it. That's why I urge the Council not to select the BRT system.

**Response:** Comment noted.

12. After the two main reasons that I feel that it's not the system for Honolulu is, number one, it serves only one out of five of the road users in Honolulu. What happens to the four of the other five? I think this morning's paper, in the editorial section, a person, I think his name was Bachman, Wally, he submitted a letter to the editors. I think that expresses the point that I had here briefly. The BRT makes the traffic problem much worse for the four of the other five transit.

**Response:** The PCTP has focused on the transit portion of the island-wide transportation plan. Highway improvements have been addressed in the OMPO regional plan update (TOP 2025).

It is not the conversion of lanes that will create the congestion. The congestion for motorists will be there without the BRT. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

13. So what system should we select? I am told that that issue is not before the Council at this point. But, I did submit in the written testimony some websites on what's termed the dualmode system which I feel is a much superior system to any of the alternatives offered here. [Gary Okino: Mr. Leong, the system you propose, the dualmode system, is basically a...looks like a fixed rail system.] It's a combination. What it is, it incorporates the best features of both the private vehicle as well as the rail system. And the private vehicle is the electric. Yeah, you have both electric cars as well as electric van type vehicles that can have ten passengers. And those vehicles can travel on the roadways just like any ordinary automobile. Whenever you're going to make a longer trip, you get up, you access onto this monorail which is built above the freeway. So, you do have the benefits of security, flexibility, convenience of an automobile as well as the benefits of a light-rail system. And that's the efficiency, the short commute times. [Gary Okino: Yeah, I guess the beauty of the system is because it's on a grade-separated system. Doesn't mix with highway traffic.] It does not take up any of the road use as the other users, the four of the other five commuters will not be affected by this system because it doesn't take up any of the road space.

**Response:** See response to comment #8.

14. [Gary Okino: Mr. Leong, the system you propose, the dualmode system, is basically a...looks like a fixed rail system.] It's a combination. What it is, it incorporates the best features of both the private vehicle as well as the rail system. And the private vehicle is the electric. Yeah, you have both electric cars as well as electric van type vehicles that can have ten passengers. And those vehicles can travel on the roadways just like any ordinary automobile. Whenever you're going to make a longer trip, you get up, you access onto this monorail which is built above the freeway. So, you do have the benefits of security, flexibility, convenience of an automobile as well as the benefits of a light-rail system. And that's the efficiency, the short commute times. [Gary Okino: Yeah, I guess the beauty of the system is because it's on a grade-separated system. Doesn't mix with highway traffic.] It does not take up any of the road use as the other users, the four of the other five commuters will not be affected by this system because it doesn't take up any of the road space.

**Response:** See response to comment #8.

15. [Gary Okino: Well, you know, I sort of agree with you. I think the fixed-rail system is the ultimate solution to this. But, you know, the thing that works against a fixed guideway system is the cost of the fixed guideway.] I've been in communications with the inventor. He estimates the rail cost to be \$7 million a mile which is much, much less than the prior fixed-rail systems that were proposed for Honolulu. The cost of a station because that's an important part. He says it's approximately the average and it depends on the size and other factors. Roughly about \$10 million a station. So, my rough estimates is you can cover the entire highway system, the freeway system that is being covered by this BRT system for about the same price, \$7 million a mile and approximately 31 miles of freeway, that's \$220 million. If you do two rails, which is not a bad idea, that would be about \$440 million. Plus the vehicles would bring it up to ... And the stations ... I estimated ten stations. That's \$100 million and with the vehicles, 2,000 MAX-RUFS.

**Response:** See response to comment #8.

16. If you look at the system, MAX-RUFS is the ten-passenger van type thing that can be used as bus. Can be used like a jitney on the regular roads. It could be used as a van pool. So it has tremendous flexibility and you could buy 2,000 of those and still be within the budget that's allocated for BRT.

**Response:** See response to comment #8.

17. I think the initial proposal to be parallel to the BRT system, you'd build this rail only over the freeways. That would, you know, at least not be objectionable to the people that are concerned about multi-grade systems on the roadways. You know, you just leave it on the freeways, over the freeways and, you know, I think ... In fact, I said every private vehicle that on this rail is off of the freeway. So it lightens up the traffic on the freeway too. If people prefer driving their vehicles on the freeway, they can. You know, they still can.

**Response:** See response to comment #8.

18. [Duke Bainum]: Mr. Leong, one question. Did your cost estimates include the purchase of right-of-way? No. No, it doesn't. Because I... Like I said, you know the freeway system is the only area that I see it as being built initially.

**Response:** Comment noted.

19. And, I'm hoping that, in conclusion, that I hoping whatever decision that you people make would relieve the current problem with our transportation and will be a great benefit for our community.

**Response:** The commenter is making a statement to the City Council.

20. As far as the endurance, the durability of the impact is gonna go on for generations. And that's how I see it. That's why I urge the Council not to select the BRT system.

**Response:** Comment noted.

Mr. Randolph Leong  
Page 7  
November 13, 2002

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6876. We appreciate your interest in the project.

DEPARTMENT OF TRANSPORTATION SERVICES  
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GEORGE KEOH MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD002-00589

Mr. Bill Leveau  
1676 Ala Moana Boulevard, #602  
Honolulu, Hawaii 96815

Dear Mr. Leveau:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. *I'm a recent arrival who happened to have brought his vehicle with him. Sorry about that. I love Hawaii.*

Response: Comment noted.

2. *You have a great mass transit system, and I think this will be a great improvement to it.*

Response: Thank you for supporting the public transportation system and the BRT project.

3. *The one concern I do have is that it would be taking up exclusive lanes, which might make it a little more difficult for the existing traffic.*

Response: It is not the conversion of lanes that will create the congestion. The congestion for motorists will be there without the BRT. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

Sincerely,

CHERYL D. SOON  
Director

Mr. Bill Leveau  
Page 2  
November 13, 2002

4. *The one positive thing I do like about it is that you're proposing 14-foot lanes which also encompasses room for bicycles. I happen to be a bicycle rider, love beautiful view, and I wouldn't move anyplace else.*

**Response:** Comment noted.

5. *Unfortunately, I was clipped by a vehicle on Kuhio Street, and that's because it's a fairly narrow street, the lanes are narrow. And that could happen in the future. With the improvements, with the mass transit wider lanes, that allows more room for a bicycle rider, whether it be a person with challenges like myself, or individual children, students going to college, whatever. Hopefully, you can reduce the number of exclusive lanes and allow the vehicles to use the public right-of-way as best as you can.*

**Response:** Safety for bicyclists has been taken into consideration in designing the In-Town BRT. The Hawaii Bicycling League has been involved in reviewing the plans as they have evolved.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



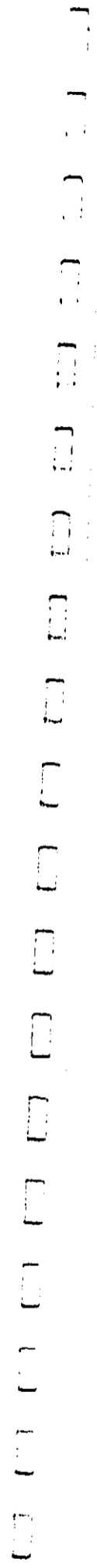
CHERYL D. SOON  
Director

### Testimony Against the In-Town BRT portion of the Primary Transportation Corridor Project

Thursday, October 5, 2000  
by Wendell Lum, member, Kaneohe Neighborhood Board No. 30

Suggest looking into a faster alternative, an automated people mover (APM) system, which is a light rail transit system but very quiet, not creating traffic congestion by not taking away lanes of traffic with high speed that only a grade-separated exclusive right-of-way can give and guaranteed to take cars off the road by cutting public transportation time significantly with 56 mph maximum speed and in much more comfort and driverless, being fully automated

**Example:** Look at Vancouver SkyTrain for information of cost in 1994 US dollars for 1986 initial phase including extensions in 1990 and 1994 attached to this written testimony. Being 17.9 miles long it is one of the most heavily used light rail transit system and highly successful. See attached table showing similar existing APM systems in Kuala Lumpur, Malaysia; Docklands, England; Lille, France; Turin, Italy; four cities in Japan and many others under construction currently in various parts of the world. More extensions are currently being proposed for Vancouver.



# BOMBARDIER TRANSPORTATION

## Skytrain System Technology



Vancouver's Skytrain is a fully automated, medium-to-high capacity line-haul rapid transit system. The principal features of the technology include Linear Induction Motor (LIM) propulsion combined with a unique steerable axle suspension, which together provide reliable performance and superior ride comfort under stringent alignment constraints and all climatic conditions. The moving block Automatic Train Control (ATC) system enhances the operational flexibility and expandability of the transit system to meet sudden changes in passenger demands and much greater, long-term travel demand.

The main benefits of Skytrain system technology are the very low noise, vibration and electromagnetic interference levels. The LIM propulsion system has no moving parts and therefore requires very little maintenance. This type of propulsion system provides direct linear movement and therefore eliminates the need for gearboxes, which are a major source of noise. Since Skytrain vehicles use magnetic force to accelerate and brake, the friction force between the vehicle wheels and the rails normally required to move a conventional train is not needed.

The Skytrain System proposed for the cities of Vancouver, Burnaby, Coquitlam and New Westminster incorporates the most recent advances in electrical subsystems, and increases the passenger-carrying capacity of the original Skytrain vehicle by 50%. The new vehicle combines the superior automation capabilities that have been demonstrated in existing MK I systems with the capacity to move large numbers of people - a unique solution to line-haul

transportation demands.

The new technology is similar to that currently being implemented on Phase 1 of the Advanced Rapid Transit (ART) MK II in Kuala Lumpur, Malaysia. The Bombardier Consortium, under a turnkey Electrical and Mechanical (E & M) contract, is supplying most of the system-wide elements, including 70 vehicles for the 29-km fully automated dual-track line.

Bombardier Transportation, a member of the AirRail Transit Consortium (ARTC), was awarded the contract for the JFK International Airport automated AIRTRAIN system in May 1998. Incorporating the latest generation of linear motor technology, the JFK System will be 13 km long and will include a fleet of 32 vehicles serving 10 stations.



Skytrain-type Systems have demonstrated over 35 years of safe cumulative service

Phase 1 of the Kuala Lumpur driverless system entered revenue service in September 1998. Serving 24 stations, the System features the second generation of Skytrain vehicles.

The Vancouver Skytrain opened for revenue service in 1986. Its 150-vehicle fleet serves 20 stations along the 28.9 km dedicated route. Skytrain carried over 41 million passengers last year.

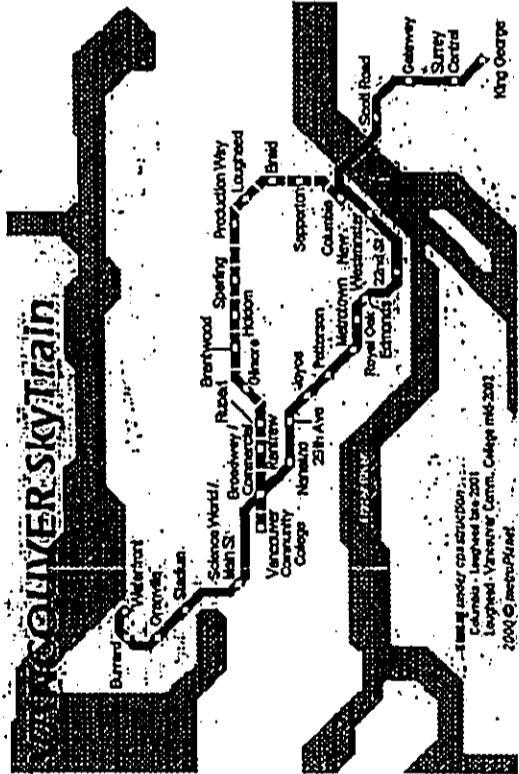
The Vancouver Skytrain and the Kuala Lumpur ART MK II are the longest fully automated rapid transit system in the world.

Scarborough's Rapid Transit System, in operation since 1985, has six stations and operates 28 cars on the 7.1-km RT feeder / distributor line.

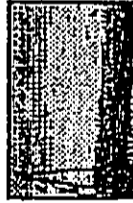
In revenue service since 1987, the Detroit Downtown People Mover carries upwards of

metroPlanet - ameriMetro: Vancouver (British Columbia, Canada) - Skytrain

## VANCOUVER SkyTrain



Vancouver (British Columbia, Canada) is situated on the west coast not too far from the U.S. border. The metropolitan area has about 2 million inhabitants. Vancouver hosted the 1986 World Expo.



SkyTrain in Skybridge (Photograph courtesy of Håkanus Schermer)

The Vancouver Metro, called SkyTrain, is an automated light rail line starting in downtown Vancouver and serving the southeastern neighborhoods of the metropolitan area. SkyTrain runs mainly on an elevated structure with trains every 2-3 minutes. Mon-Sat 5:35 - 1:15, Sun 7:50 - 24:15.

Station platforms are 80m long which allows 6-car-trains (usually 4-car-trains used). The average station distance is 730m in the city center area and 1750 in other areas. All stations (not Granville) have elevators.

Trains have names like *Spirit of Victoria*, *Spirit of Vancouver*, etc.

### History:

Jan 3, 1986 - 21.4 km (15 stations) - Waterfront - New Westminister

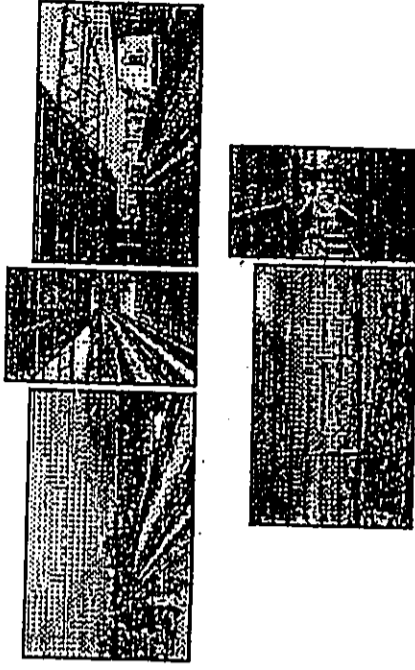
March 16, 1990 - 3.2 km - New Westminister - Scotts Road (including Sky Bridge across Fraser River - 616m)

1994 - 4 km - Scotts Rd - King George

Total length: 28.6 km (only 1.3 km in a former railway tunnel in downtown Vancouver - Burrard and Granville, short stretches between New Westminister and Columbia, and Scotts Rd - King George also underground), total traveling time is 39 minutes.

Apart from SkyTrain there is the West Coast Express which only operates into Vancouver in the mornings and from Vancouver in the evenings.

A second line is being built to connect Broadway to New Westminister scheduled to open late-2001 between Columbia and Lougheed Mall, the remaining section will be put into service by mid-2002. It will be mostly elevated but partly underground. See link below for details.



Pictures courtesy of Matthew Huxton

### Links

[Coast Mountain Bus Company - Skytrain Page - SkyTrain \(Official Page\)](#)

[TransLink \(Transport Authority\)](#)

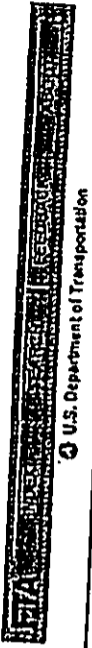
[RapidTransit - Reports on Skytrain Extension Project](#)

57,000 people on peak days and employs  
12 cars along a 4.7-km single-lane loop.

Page up

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# AUTOMATED PEOPLE MOVER APPLICATIONS: A WORLDWIDE REVIEW

L. David Shen<sup>1</sup>, Jan Huang<sup>2</sup> and Fang Zhao<sup>3</sup>

## ACKNOWLEDGEMENTS

This study is partially supported by the National Urban Transit Institute (NUTI) and U.S. Department of Transportation. Their support is gratefully acknowledged. However, the statements and opinions expressed in this paper are the sole responsibility of the authors.

## ABSTRACT

Automated people mover (APM) systems consist of automated, electric-powered, driverless vehicles operated singly or in multi-car trains on steel or concrete guideways. APM systems provide a high quality of service and are capable of moving between 2,000 to 25,000 passengers per hour per direction. Over the past two decades, APM technology has been extensively used for circulation service in airports, recreational parks and central business districts. APM technology has also been used for trunk line transit service, such as the VAL system in Lille, France, and the SkyTrain in Vancouver, Canada, both of which are significantly successful. This paper attempts to conduct a worldwide review of APM applications for urban transit and airport circulation services to obtain a full understanding of the costs, benefits, capabilities and efficiencies of this advanced transit technology. It may be concluded that APM systems are a suitable mode of high level-of-service for trunk line transit service in a medium population area and for circulation services in major activity centers such as airports, recreational and central business district areas.

## KEYWORDS

: Automated People Mover, Level-of-Service, Capital Cost, Mass Transit, Guideway Transit System, Airport.

## INTRODUCTION

Over the last two decades, the automated people mover (APM) is one of the most significant developments in transit technology. APMs can carry from 2,000 to 25,000 passengers per hour per direction with headways as short as 60 seconds and even shorter than this for small APM systems, offering convenience comparable to riding modern elevators. The ride quality for APMs is among the best of any transit system in the world. APM vehicles travel at speeds up to 90 km/h (56 mph) and accelerate and decelerate smoothly and swiftly. The vehicles, which are typically comprised of cars of urban transit bus size, stop and start automatically, and they can operate in an on-demand mode during off-peak hours to minimize energy consumption or

maintain a good service frequency to reduce passengers' waiting time without incurring too much operating expenses. Besides, APM systems have also kept an excellent record of reliability and safety.

APMs have been extensively operated within restricted major activity centers such as airports, entertainment and educational complexes, large retail and employment centers and urban central business districts (CBD). There have been over fifty airport APM applications worldwide. APMs have their obvious advantages, which include high ride quality, short headways, flexibility in operation, excellent reliability and safety records, etc. APM technology has also been used for trunk line transit services, such as the SkyTrain in Vancouver, Canada, and the VAL system in Lille, France, both of which are significantly successful. Today, one sixth of all transit passengers in the Vancouver region use the SkyTrain for all or part of their daily trip. In other words, the SkyTrain carries 35 million passengers annually at a rate of 110,000 trips per day, making it in the last decade, one of the most heavily used rail transit systems in North America (BC 1994). The VAL system in Lille, France is also an example of a successful line haul APM applications in Europe. In 1993, the Lille VAL system carried 50 million passengers; 230,000 daily on working days. In addition, the farebox recovery ratio of the VAL system is 120 percent, which means it is profitable (The VAL Metro). For the Vancouver SkyTrain the ratio is about 100% (interview 1994). Some of the line haul APM systems presently in operation or under construction are listed in Table 1.

Table 1. Line Haul APM Systems in the World

System	Status	Length (miles)	No. of Stations	No. of Vehicles	Line Capacity (pphpd)
Ankara Metro, Turkey	UDC <sup>1</sup>	9.4	12	108	2
Docklands, England	Operating	16.7	35	80	15,600
Bordeaux, France	UDC	6.2	16	64	-
Lille, France	Operating	15.7	36	83	24,000
Lyon, France	UDC	-	-	-	-
Mexico City SkyTrain	UDC	13.1	27	60	-
Rennes, France	UDC	5.6	15	16	-
Toulouse, France	Operating	6.2	15	29	-
Turin, Italy	UDC	5.6	16	34	-
Vancouver SkyTrain, Canada	Operating	17.9	19	130	25,000
Taipei, Taiwan	UDC	7.2	12	102	24,000
Yamanote Chiba	Operating	5.0	-	-	1,900
Kokura Kitakyusyu	Operating	5.2	-	-	4,800
Kobe Portliner, Japan	Operating	4.0	9	72	10,800
Kobe Rokkoliner, Japan	Operating	2.8	-	-	10,000
Yokohama, Japan	UDC	6.7	14	95	4,300
Osaka, Japan	UDC	4.1	8	60	5,000

Hiroshima, Japan UDC 11.4 - 4,000

Note:

1 UDC stands for underconstruction

2 - indicates not available

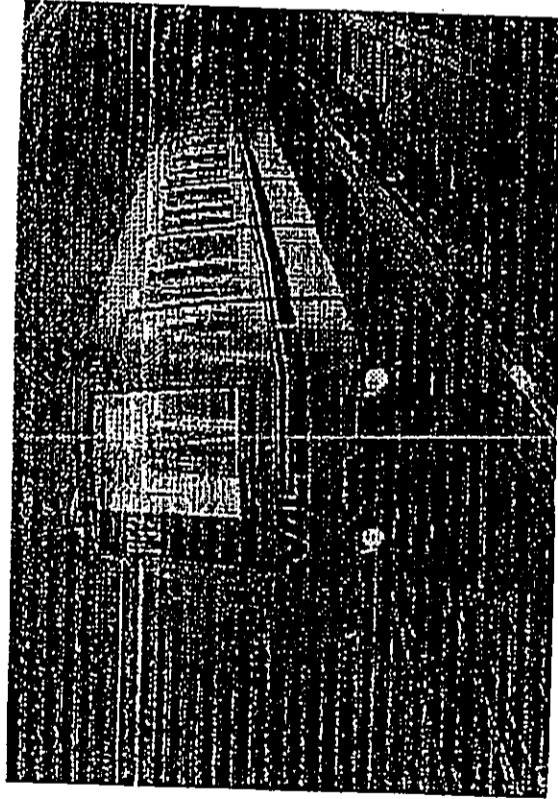
The objective of this paper is to conduct a worldwide review of APM applications for urban transit and airport circulation services to obtain a full understanding of the costs, benefits, capabilities, and efficiencies of this advanced transit technology. In the urban transit area, the Lille VAL, the Vancouver SkyTrain, the Declines Light Railway in England, and the Miami Metromover will be examined. The SK system in Charles De Gaulle (CDG) International Airport in Paris, France, the APM system in New Denver International Airport and the APM system in Newark International Airport, New Jersey will be reviewed as representatives of airport APM systems. The review of these represented APM systems will be focused on their costs, benefits, capabilities and efficiencies.

### URBAN AUTOMATED PEOPLE MOVERS

The VAL System in Lille, France

The VAL system in Lille, France, was the first line-haul APM system in the world. Shown in Exhibit 1, the existing system is 25.3 km in length and has 34 stations. The line capacity of the system is 24,000 passengers per hour. Lille is an old, dense, multi-centered metropolitan area, located in the north of France. It is the fourth largest urban area in the country, with a population of 1.1 million in an area of 600 sq-km.

Exhibit 1 The VAL System in Lille, France



The Lille VAL system was initially conceived as a link to connect the old city with the new town where the new University of Lille campus is located. The decision was made to choose APM technology because of its capacity to provide frequent service while occupying a smaller space. Options to expand the highway were considered, but rejected as being too costly and disruptive to the historic city center. Heavy rail was also considered, but unjustifiable due to the density of the area. In 1993, the Lille VAL system carried 50 million passengers at a rate of 230,000 daily on weekdays (The VAL Metro). Many existing heavy rail systems in the world carry less people than the Lille VAL system.

#### The SkyTrain in Vancouver, Canada

Greater Vancouver, a metropolitan area located on the west coast of Canada, has a population of about 1.6 million and an area of 640 sq-km. It has a strong, active downtown, low density suburbs with some medium density clusters, many highway bottlenecks and few freeways. In 1980, the SkyTrain system, shown in Exhibit 2, was initiated to provide an alternative to the automobile and bus along a long-established corridor, to channel metropolitan growth into an efficient transit oriented corridor. Additionally, the SkyTrain was built to serve crowds and as a demonstration of new technology for Expo86, whose theme was transportation.

Exhibit 2 The SkyTrain in Vancouver, Canada



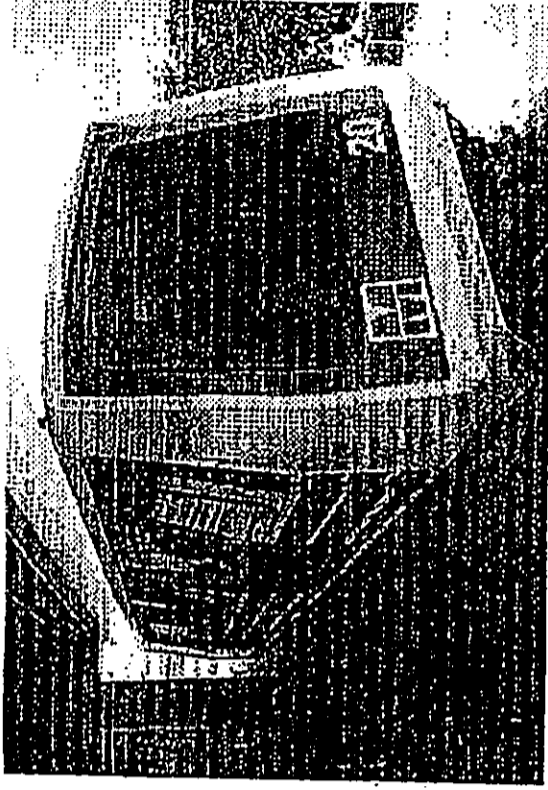
The Vancouver SkyTrain was the first line-haul APM transit system in North America. The first phase of the SkyTrain was opened in 1986. Subsequently, two extensions opened in 1990 and 1994. The system is 28.8 km in length and has 20 stations. The line capacity of the system is 25,000 passengers per hour. The SkyTrain system has integrated its fare and operating schedules with the Seabus at the Waterfront station and buses at all stations. In FY94, 35.8 million passenger-trips were made on the SkyTrain at a rate of 133,000 weekday passenger-trips (BC 1994).

#### Docklands Light Railway in London, England

The Docklands Light Railway (DLR) was initiated by the idea to regenerate Docklands by stimulating real estate redevelopment in this formerly derelict area. The DLR system is also to provide a low volume, low cost but high quality transit linkage into the London Underground and commuter rail networks. The initial system had 15 stations and a length of 12 kilometers, opened in August 1987. The currently existing DLR network consists of four legs radiating from Poplar where the head office, control center and engineering facilities are located. Automatically controlled trains, in distinctive blue, white and red livery, run at frequent intervals. The DLR serves parts of the East End of London and London Docklands north of the River Thames. Exhibit 3 shows a DLR train and station platform.

Exhibit 3 Docklands Light Railway System in London, England





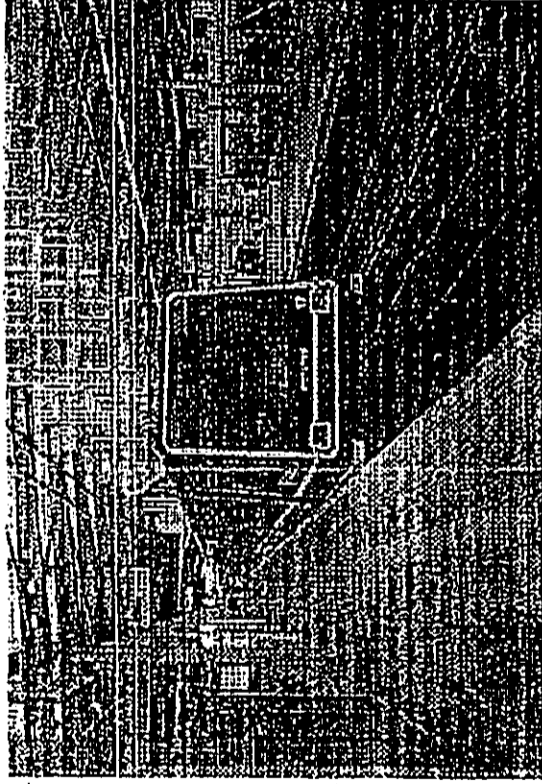
#### AIRPORT AUTOMATED PEOPLE MOVERS

SK System in CDG International Airport, France

The SK system in Paris Charles De Gaulle (CDG) International Airport, France, consists of Lines 1 and 2, which will be opened for service in 1996 and 1997, respectively. Line 1 has a length of 3,500 m and five stations while Line 2 has a length of 800 m and three stations. The hourly capacity per direction will be 2,900 persons in the initial stage and 5,000 persons in the final stage. Minimum headway will be 36 seconds in the initial stage and 21 seconds in the final stage. Exhibit 5 shows the SK train in CDG airport.

SK systems are comprised of a series of cars (a maximum of 30 passengers per car) is pulled by a cable which continuously circulates at a top speed of 20 mph. The minimum headway between each car is 17 seconds. The cars remain in continuous movement. Upon entering stations, the cars detach from the main circulating drive cable, but do not come to a complete stop. They continue to move along the boarding platform at a very low speed (less than one foot per second, or three times slower than the circulating speed of a moving sidewalk) for passenger boarding and exiting. Turntables located at each terminus allow cars to change track and direction in a very limited space. According to experts, the SK system is a suitable passenger transportation system for distances ranging from one thousand feet (305 m) to three miles (4827 m) (SK 1994).

Exhibit 5 Sk System in CDG International Airport, Paris



The Railway is operated by Docklands Light Railway Limited: Until March 1992 a wholly-owned subsidiary of London Regional Transport, and now part of the London Docklands Development Corporation. A typical DLR train has a capacity of 284 passengers. The minimum designed headway is two minutes. The current service headway is 10 minutes.

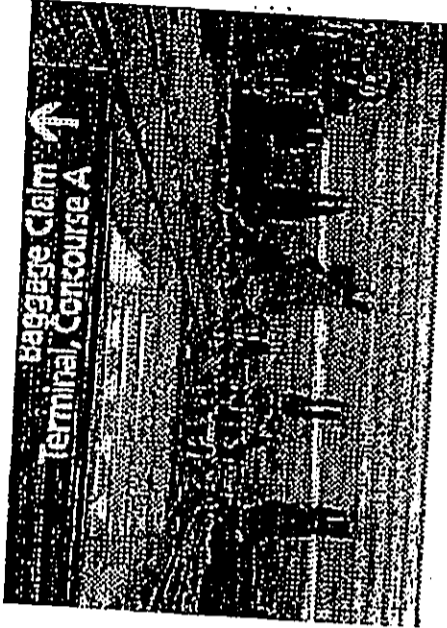
The Metromover In Miami, U.S.A.

As part of the Metropolitan Dade County Transportation Improvement Program, the Metromover was built to provide a means for downtown circulation and serve as a downtown feeder for Metrorail, the heavy rail system (Goldberg and Potter 1985). Construction began in June 1983, and the system opened in May 1986 as the first APM in a downtown setting, with 1.9 miles of double track and 10 stations. The total system cost in 1986 dollars is \$159 million, or \$83.2 million per mile.

In May 1994, a new extension of the Metromover was opened. The extension adds additional 12 stations and 2.5 miles of track to the existing system. The extension is mostly double track and is divided into two legs. The Brickell leg is to the south and consists of six stations and 1.1 miles. The other leg, known as the Omni leg, has its own six stations and 1.4 miles of track. The entire system now consists of 4.4 miles of track and 22 stations and connect to the rapid rail at two locations. The extension costs a total of \$228 million (or \$91.2 million per mile), 35% of which pays for the guideway and station construction and another 27% is for the vehicles, controls and designs to AEG Westinghouse. Since the opening of the extension in May, daily ridership has increased to 12,500, close to the predicted 13,000. Exhibit 4 shows the Miami Metromover system.

Exhibit 4 Miami Metromover at a Station





The Airport Monorail System in Newark International Airport, New Jersey, U.S.A.

The estimated \$350 million 1.9 miles Monorail system in Newark International Airport is expected to reduce vehicular traffic significantly in the Central Terminal Area by eliminating the numerous on-airport car rental, inter-terminal and parking lot bus operations on the circulating roadways and terminal frontages. The system will provide fast, convenient transportation among the airport's three terminals Parking Lots D and E, and car rental facilities.

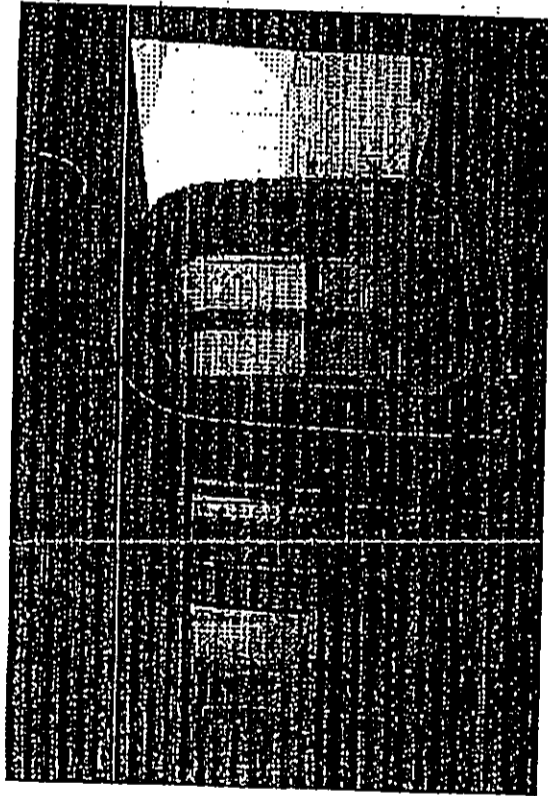
The monorail system will consist of fully automated, computer-controlled trains operating on a 1.9 miles long, dual-lane, bi-directional guideway. Passengers will access the system from any one of seven stations; three in Parking Lot D; on each in Terminals A, B and C; and one in Parking Lot E. Fully accessible to all riders including those with restricted mobility. The system will have a capacity of 2,600 passengers per hour between any two stations in each direction with a waiting time at any station of less than two minutes during peak periods. 24-hour operations a day, 365 days a year will be implemented after this automated monorail system is completed in October 1995.

The Newark International Airport monorail system is provided by AEG Monorail Systems, Inc. (AMS) including the design and construction of the guideway; fabrication of all vehicles; design and installation of the train controls; communication, propulsion and power distribution systems; and all equipment with the maintenance and control facility. The total fleet for this system will be 12 trains, each train consisting of 6 cars initially or 7 cars ultimately. Accordingly, the passenger capacity of a train will be 78 persons initially and 90 persons ultimately.

#### SYSTEM CHARACTERISTICS

System characteristics of the four urban transit and three airport circulation APM systems are summarized in Table 2.

#### CAPITAL COSTS



APM System in New Denver International Airport, U.S.A.

The \$5 billion new Denver International Airport (DIA) was opened in February 1995. The 34,000 acre, five runways, 94 gates, 13,000 parking spaces airport is projected to handle 34 million passengers in its opening year and will have the capacity to serve up to 110 million passengers and 1.2 million aircraft operations annually by 2020. As the first major airport built in the U.S. in more than 20 years, DIA represents the state-of-the-art in airport design. From the automated underground train between the terminal and concourses, to the 5,300 mile web of fiber-optics communication system that covers the whole airport, to the most advanced air traffic control system in the world, every piece of this airport was designed to make passenger's journey as convenient and efficient as possible.

The nerve center for the entire airport is a 6,200 feet tunnel that contains the automated transit system and the baggage handling system. The transit system, provided by AEG Transportation Systems, includes 16 C-100 vehicles, automatic train control and a power distribution system. The APM system has the capacity to transport 12,000 passengers an hour between the airport's main landside terminal and its three airside concourses. Exhibit 6 shows the platform and screen door of the APM system.

Exhibit 6 Platform and Screen Door for APM System in DIA, Denver

The capital cost data for each system, as shown in Table 3, was converted to 1994 U.S. dollars with adjustments for time and currency conversion. It should be noted that the capital costs of the airport APM systems do not include the land costs, which may be 5 ~ 10% or more of the total capital cost. Additionally, it should be mentioned that airport APM systems have smaller vehicles and lighter guideway.

In order to have a understanding of APM costs compared with those of rapid rail and light rail transit systems, the Washington, D.C., Atlanta, Baltimore and Miami RRT systems are selected based on availability of cost data while the LRT systems in Buffalo, Pittsburgh, Portland and Sacramento are selected to represent LRT systems. Table 4 gives the capital cost ranges and averages of RRT, LRT and urban APM systems. The idea that APMs are expensive may be somewhat of a misperception. The capital costs for APM systems fall between those of LRT and RRT systems. This is very logical.

Table 2. System Characteristics of Automated People Movers

System	Lille Val	Vancouver	London	Miami	Paris	Denver	Newark
Supplier	MARTA	UTDA	GEC/Mowle	AEG	CDG	APM	APM
Start Up	1983	1986	1987	1986	1996	1995	1995
Technology	rubber tire, third rail	steel wheel, third rail	steel wheel, third rail	rubber tire, third rail	steel wheel, cable-drawn	steel wheel, third rail	monorail
Guideway Length	Total	25.3 km (15.7 mi)	28.8 km (17.9 mi)	27.0 km (16.7 mi)	4.3 km (2.7 mi)	2.9 km (1.8 mi)	3.1 km (1.9 mi)
	Underground	68%	4%	12%	0%	0%	0%
Elevated	Total	26%	86%	83%	100%	100%	100%
	At-Grade	6%	10%	5%	0%	0%	0%
No. Stations	Total	36	20	35	21	7	7
	Avg. Spacing	0.7 km (0.4 mi)	1.4 km (0.9 mi)	0.7 km	0.3 km	0.5 km	0.4 km
Fleet Size	83 two-car sets	130	80	29	79	16	12
Maximum Speed	90 km/h (56 mph)	90 km/h (56 mph)	80 km/h (50 mph)	36 km/h (line speed)	36 km/h (line speed)	43.4 km/h (27 mph)	43.4 km/h (27 mph)
Minimum Headway	60 sec	90 sec	120 sec	60 sec	21 sec	60 sec	60 sec
Train Consists	2, 4 cars	2, 4, 6 cars	2	1, 2 cars	1	2	6, 7 cars
Car normal capacity (psn)	72 (34 seats)	75 (40 seats)	210 (84 seats)	100	29	100	13
Car Crash Capacity (psn)	100	100	260	155	29	100	13
Line Capacity (pphpd)	24,000	25,000	15,600	12,000	5,000	12,000	5,400

Table 3. Capital Costs of Line-Haul APM Systems and RRT and LRT Systems (Millions)

and reasonable as APM systems, generally speaking, have better levels of service than LRT systems while the capacity of an APM system, even as a trunk line service, is less than that of a RRT system. The average capital cost for airport APMs are less than that of LRT systems.

System	Year built	Cost in year built	Cost in 1994 US dollars	Route Length (km)	No. stations	Car/Train Capacity (persons)	Per km cost in 1994 US dollars
Lille VAL	1983: phase 1						
	1984: phase 1b	'87US\$660 <sup>1</sup>	\$1,664	25.3	36	100/400	\$65.8
	1989: line 2	'87US\$567 <sup>1</sup>					
Vancouver SkyTrain	1986: phase 1	US\$615 <sup>2</sup>					
	1990: ext. 1	US\$145 <sup>2</sup>	\$1,133	28.8	20	100/600	\$39.4
	1994: ext. 2	Can\$127 <sup>2</sup>					
London DLR	1987: phase 1	'87ca77 <sup>2</sup>					
	1991: ext.	'91ca278	\$1,152	27.0	35	260/260	\$42.7
	1992: ext.	'92ca248					
	1993: ext.	'93ca46					
Miami Metromover	1986	US\$159					
	1994: ext.	US\$228	\$492	7.1	21	100/200	\$69.3
Paris CDG Airport APM	1996	\$100 <sup>4</sup>	\$100	4.3	8	29/29	\$23.2
Denver Airport APM	1995	\$149 <sup>5</sup>	\$149	2.9	7	100/100	\$51.4
Newark Airport APM	1995	\$350 <sup>6</sup>	\$350	3.1	7	13/60	\$112.9

Note: <sup>1</sup> Source: EcoPlan STS - Lille Case Study Report, 19990 (EcoPlan 1990b)

October 12, 2000

According to the Oahu Regional Transportation Plan, Preliminary Model Run Statistics, Daily Vehicle Delay (000s of hours) comparing year 2000 to year 2025 traffic congestion on all streets and highways will be severe. That's just another reason why I strongly feel a grade separated option for public transit similar to the existing and expanding Vancouver Skytrain system in Vancouver, Canada.

Because it runs on its own tracks, separated from roads, Skytrain eliminates conflicts that are frequent on the road system. And for that reason, its almost always on time. The engines on Skytrain, the linear induction motors, have no moving parts and rarely need maintenance, making the system one of the most reliable options in the world.

Skytrain uses only one kilowatt-hour of electricity per 5.9 passenger miles - about the same amount of power it takes to run a color television for three hours, and far less than other rapid transit systems.

It's quieter than most vehicles. Skytrain's noise emissions are comparable to those of an electric trolley bus. Skytrain produces no air pollution. Skytrain fully automatic cars do not have drivers and can run frequently as one-and-a-half minutes apart.

A current and now ongoing addition to Vancouver's Skytrain system, approximately 13 miles, more or less, with 12 stations, is costing 1.17 billion dollars (Canadian dollars) or about \$790 million (U.S. dollars). Construction began in September 1999 and on October 5, 2000, it was announced that construction had reached the 50% point. Also the \$790 million (U.S. dollars) includes construction of an 800 meter twin tunnel (2600 feet long) a problem which Honolulu will not have.

Construction should continue until early 2001. For efficiency construction is conducted in several areas at the same time. While building the elevated guideway, SAR Transit, general contractor, will use innovative techniques to reduce costs and neighborhood disruption.

For site preparation, this initial stage of construction involves clearing areas that are slated for construction and relocating any utilities that will obstruct construction. Utilities requiring relocation include gas and telecommunications lines and sewage and water pipelines. In most cases they will be returned to their original locations when construction is complete. Equipment that are necessary include trucks, loaders, chippers, augers, backhoes and graders.

Good lighting and open spaces were the most frequently raised requests among community station design initiatives. Each transit station will be architect designed to enhance or fit the character of the neighborhood or zoning.

Bombardier Transportation, the general contractor, builds the new Skytrain which involves several key areas: utility relocation, construction preparation, guideway construction, station construction and the installation of rails and guideway systems. These steps will not necessarily occur in chronological order, some may take place simultaneously.

Following the completion of the construction elements, residents will experience only minimal

disturbances. This is because much of the subsequent work will take place on top of the guideways, at the stations or from the system control center and other remote sites.

With the new Skytrain line comes a new industry for British Columbia. Fifty of the 60 Skytrain cars ordered for the new line will be manufactured in Burnaby, British Columbia, in Bombardier Transportation new Centre for Advanced Systems. The new centre will also market Skytrain technology worldwide, with special emphasis on meeting Asia's growing urban transit needs. Bombardier Transportation principal operations are based in Quebec, Canada.

Employment for Bombardier's new Centre for Advanced Transit Systems will create more than 900 permanent, direct and indirect jobs, and generate more than \$115 million (Canadian dollars) in wages, salaries and benefits by 2003. In addition, about 2,700 jobs will be created during construction of the new Skytrain line.

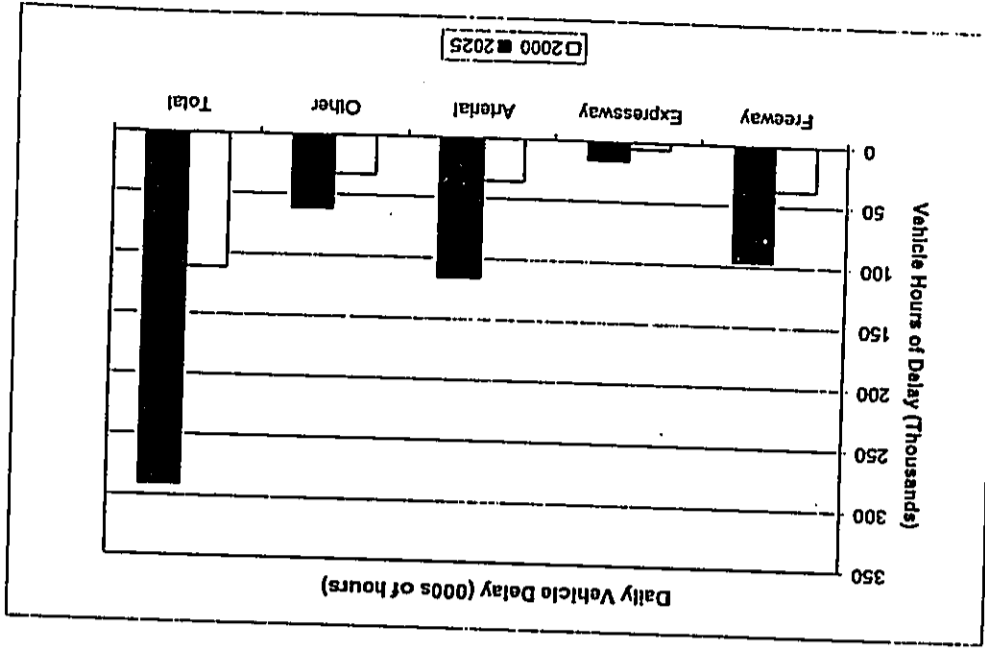
Everyone will have a reason to get on board the new Skytrain line - What about the City & County of Honolulu?

Mahalo!

Wendell Lum

(co-chair, Planning Committee, Kaneohe Neighborhood Board No. 30)

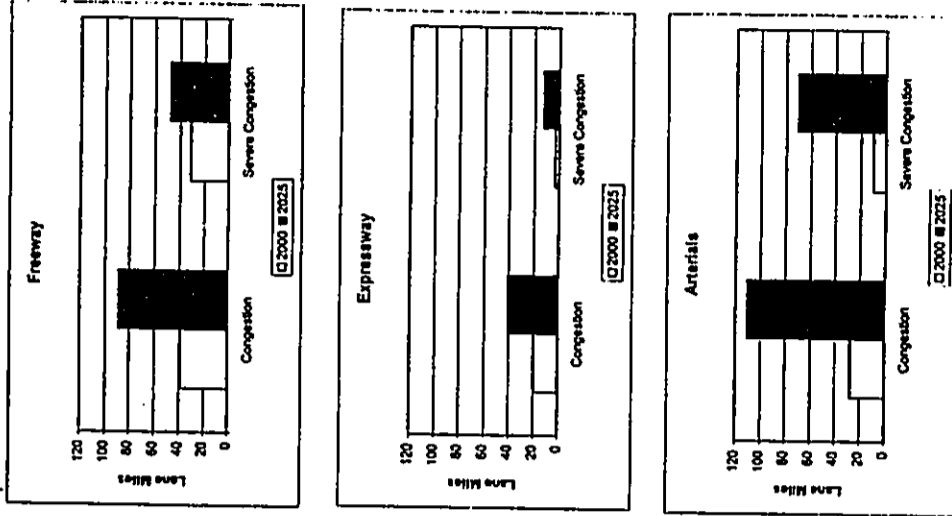
Oahu Regional Transportation Plan  
Preliminary Model Run Statistics



Note: Delay based on difference between freeflow and congested speeds.

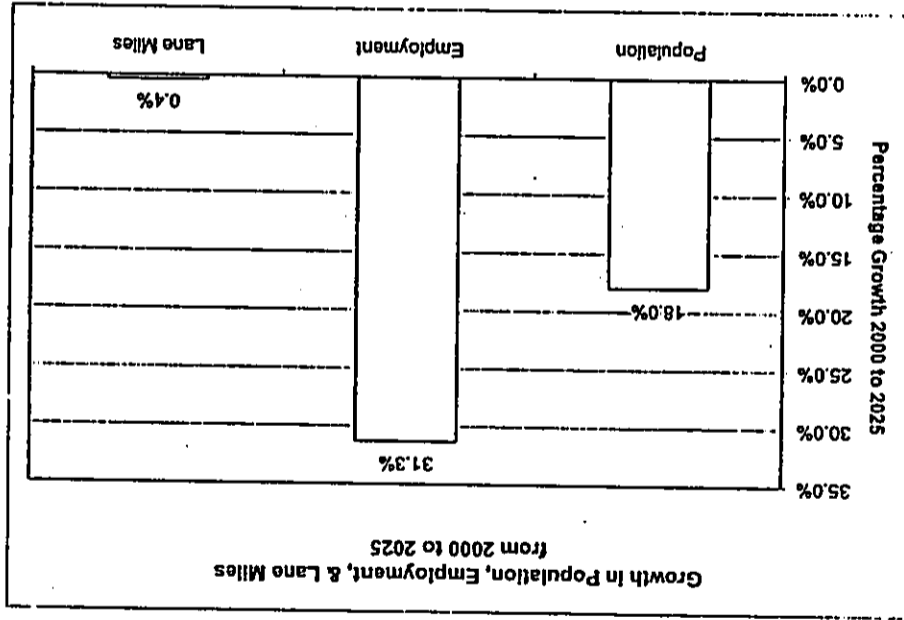
Oahu Regional Transportation Plan  
Preliminary Model Run Statistics

Congested Lane Miles in the AM Period



Note:  
Congestion based on V/C ratios.  $0.8 < V/C < 1.0$  for Congestion;  $V/C > 1.0$  for Severe Congestion

09/12/2000



Oahu Regional Transportation Plan  
Preliminary Model Run Statistics

Growth in Population, Employment, & Lane Miles  
from 2000 to 2025

Ms. Donna Turchie  
Senior Transportation Representative  
Region IX  
Federal Transit Administration  
U.S. Department of Transportation  
201 Mission Street, Suite 2210  
San Francisco, California 94105-1839

MAY 1 2002

cc: Ms. Cheryl Soon, Director, Department of Transportation Services, C & C of Honolulu  
Councilperson Darryn Bunda, Honolulu City Council  
Councilperson Ann Kobayashi, Honolulu City Council  
Councilperson Romy Cachola, Honolulu City Council  
Councilperson Gary Okino, Honolulu City Council  
Councilperson Jon Yoshimura, Honolulu City Council  
Councilperson John DeSoto, Honolulu City Council  
Councilperson John Henry Felix, Honolulu City Council  
Office of Environmental Quality Control, Department of Health  
Honolulu Star-Bulletin, Letters to the Editor  
Honolulu Star-Bulletin, Letters to the Editor  
Midweek, Letters  
Honolulu Weekly, Letters

**Possible Blunder for Primary Corridor Transportation Project**

Another faster and much more comfortable mass transit alternative for the In-Town portion of the Primary Corridor Transportation Project for a grade-separated light rail system was left out with a poor explanation in the MIS/Draft EIS. Compare the 1992 proposal of a 15.9 mile grade separated rail system which was projected to cost over a \$1 billion U.S. dollars and the current the In-Town BRT of about 12 miles will cost maybe around \$400 million.

The latest grade-separated technology now has a less intrusive elevated guide way. An example is the Vancouver Skytrain in Vancouver, British Columbia. An addition of 12.6 mile that is projected for completion after less than three (3) years on September 2002 and announced it will be completed with a surplus on April 16, 2002. The In-Town BRT portion costs are hypothetical yet and definitely more with a suggested long term plan and newer technology in the future.

The Millennium Line includes construction of 13 architect designed glass enclosed transit stations with elevators/escalators, a twin 2500 feet tunnel which Honolulu does not require and twenty (20) pairs of next generation MK II Skytrain cars (260 passengers a pair) at a cost of below \$762.5 million U.S. dollars. Guide way construction began in 1998 with MK II cars produced in Burnaby, B.C.

The MIS/Draft EIS of August 2000 (pg. 2-42) states that an 11.8 mile elevated rapid transit system along the presently proposed In-Town BRT alignment would cost on the order of \$1.6 billion in 1998 dollars and by comparison, the In-Town BRT system costs are estimated at around \$375 million in 1998 dollars but which since has been increased with the Supplemental Draft EIS of March 2002.

A shorter grade-separated light rail system from the proposed Middle Street Transit Station to the University of Hawaii without a Waikiki corridor can make it affordable and expandable in the future. Private local transportation companies can utilize the Hub and Spoke concept off Transit Station(s) to do Waikiki also.

Mahalo,



Wendell Lum (45-135 Lilipuna Road, Kaneohe, HI 96744-3022; (808) 2470597).

MAY 8 2002

May 6, 2002

Ms. Donna Turchie  
Senior Transportation Representative  
Region IX  
Federal Transit Administration  
U.S. Department of Transportation  
201 Mission Street, Suite 2210  
San Francisco, California 94105-1839

Dear Ms. Turchie:

Subject: Primary Corridor Transportation Project  
Supplemental Draft Environmental Impact Statement

Enclosed you will find my additional comments to responses I received from a letter received with the Department of Transportation Services responses to my comments of the Supplemental Draft Environmental Impact Statement (SDEIS) dated March 8, 2002 from Ms. Cheryl D. Soon, Director, Department of Transportation Services, City and County of Honolulu.

Mahalo,



Wendell Lum  
(member Kaneohe Neighborhood Board No. 30)

cc: Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
Office of Environmental Quality Control  
Department of Health  
State of Hawaii

Comments	Response	Additional Comments to Responses
<p>After Rounds 1 and 2 of the Oahu Trans 2K meeting, public and agency input was combined with technical analysis to define an initial set of alternatives. Only No-Build, Enhanced Bus/Transportation System Management (TSM), Bus Rapid Transit (BRT), and Light Rail Transit (LRT) were considered. A cost-effective shorter grade-separated light rail alternative most over existing street rights-of-way was not included to be an alternative for the In-Town portion.</p> <p>As the chosen Locally Preferred Alternative (LPA) the last time and within the last ten years it should have been again naturally included, for comparison, once and for all to see and comment on.</p>	<p>A fully grade-separated transit system was considered and rejected since it was determined that the public was not in favor of an elevated transit system because of its high cost and its physical and visual impacts. This is discussed in Chapter 2.6.1 of the MIS/DEIS.</p>	<p>From Rounds 1 and 2 of Oahu Trans 2K public meetings there were displays/models/slides of the Bus Rapid Transit Proposal, No-Build, Enhanced Bus/Transportation System Management (TSM), and Light Rail Transit (LRT) but nothing of a grade-separated transit system not even the model produced from the older previous defunct 1992 15.9 mile proposal which was the overwhelming locally preferred alternative (LPA) then but down voted by a single vote by the then Honolulu City Council.</p>
<p>The process should ensure that critical community concerns and technical issues are identified early in the study and addressed in the engineering, environmental, economic, and financial analyses...</p>	<p>The Primary Corridor Transportation Project is following the requirements of the National Environmental Policy Act (NEPA) and Chapter 343 of the Hawaii Revised Statutes (HRS), as amended. The purpose of the NEPA and HRS processes is to ensure that accurate environmental studies are performed, that they are done with public involvement, and that public officials make decisions based on an understanding of environmental consequences.</p> <p>For the past two years the City and County of Honolulu (City) has conducted the 21st Century Oahu visioning process including its transportation component, Oahu Trans 2K. It has been the most extensive community-based transportation planning effort in the City's history and it is the principal public outreach medium for the Primary Corridor Transportation Project.</p> <p>During the DEIS process, in addition to the required scoping meetings, meetings with over 100 governmental agencies, elected officials, businesses, and business, community, and civic organizations to present the elements of the Final Mobility Plan and gather information and comments.</p>	<p>Critical community concerns which was not explained in detail from the outset and other public meetings and also in the MIS/DEIS of Primary Corridor Transportation Project of August 2000 is the impact of what the loss of one and in many cases two lanes of auto traffic lanes and in many cases only a single lane of auto traffic each way on existing major street rights-of-ways.</p> <p>An inventory of the participants in public meetings held by the City's Department of Transportation Services will show much less than 1% of the population of Honolulu's residents were participants. A significant amount of persons who were in attendance were repeaters, like myself, and from the City and County of Honolulu's Neighborhood Board System and participants in the Mayor's Vision teams throughout the City and County of Honolulu. Many other local meetings had poor attendance as public records will show.</p>



Comments	Response	Additional Comments to Responders
	<p>project</p> <p>A fully grade-separated transit system was considered and rejected since it was determined at the outset that the public was not in favor of an elevated transit system because of its high cost and its physical and visual impacts. This is discussed in Chapter 2.6.1 of the MIS/DEIS.</p>	<p>of the Trans 2K public meetings. It may be a blunder of the decade by the current Honolulu City Council and the Department of Transportation Services. The public was never given a chance either by vote or before the Trans 2K meeting began. It was determined before that.</p>
<p>According to the U.S. Department of Transportation website: <a href="http://www.fhwa.dot.gov/research/pdfs/brt.pdf">http://www.fhwa.dot.gov/research/pdfs/brt.pdf</a> there are problems of arterial bus priority treatments (Bus Rapid Transit).</p>	<p>Although there are obstacles to successful implementation of a BRT system, it can provide a flexible and cost-effective method of public transportation. When properly developed in cooperation with land use policies and development plans, the BRT system can provide fast, reliable, and convenient transit service to cities and suburbs. It can also lead to compact, pedestrian-oriented, and environmentally sensitive development that preserves neighborhoods and open space.</p>	<p>The obstacles are many as all at-grade transit alternatives encounter. The In-Town BRT is a short-term help but quickly will add to the traffic gridlock as it takes away lanes of auto traffic. The speed as suggested and shown on video by the City's consultants are hypothetical and shown overlaid on motion pictures without any or real automobile traffic.</p>
<p>Providing high quality service within the downtown sections of metropolitan areas like Honolulu which is the key to the Bus Rapid Transit concept has not been the subject of a comparable effort in the rest of the U.S.</p>	<p>The BRT is based on the most ubiquitous technology around the world - the bus. It has been continuously improved and updated with BRT being the most recent application of this proven technology. The key BRT features being proven in Honolulu have been tested and proven in cities throughout the world including Curitiba and Sao Paulo, Brazil; Brisbane and Adelaide, Australia; Auckland, New Zealand; Vancouver and Ottawa, Canada; Dublin Ireland; Nagoya, Japan; New York City, Los Angeles, Pittsburgh, and Orlando in the U.S.</p>	<p>The variations possible of BRT technology is not well defined for applications that will vary from city to city. But Vancouver, British Columbia in the west coast of Canada has a form of BRT technology but is used only to complement the existing Grade-Separated Elevated Vancouver Skytrain System and not by itself as Honolulu's proposal. Vancouver is enjoying success with its transportation system.</p>
<p>The most basic obstacle to creating bus lanes in Honolulu is the lack of adequate cross section to separate buses from general purpose traffic.</p>	<p>The BRT Alternative is comprised of a mix of exclusive BRT, semi-exclusive BRT and mixed-use lanes. The BRT system strives to strike a balance between transit speed and impacts to general traffic. In segments where it was judged that roadway capacity was needed for general traffic and the BRT operation would not be significantly affected, exclusive lanes were replaced by either semi-exclusive or mixed-flow operations. In areas of high BRT ridership volumes, exclusive transit lanes were retained such as on Dillingham and through Downtown.</p>	<p>This mix of exclusive, semi-exclusive BRT and mixed-use lanes are each a part of the problem of a BRT system. Where are these cars who use the above lanes go? We have many close-by crossing streets which cars today use and there will be more cars in the future and the next generation. There are traffic lights at practically every intersection and high pedestrian traffic in Downtown. It would help with wide street rights-of-ways.</p>

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Comments	Response	Additional Comments to Responders
	<p>Over 70 presentations were made at community-sponsored meetings that were held prior to issuance of the MIS/DEIS. The formal public hearing was held on October 12, 2000.</p> <p>The City Council Transportation Committee has been continuously briefed on the project status since inception. In anticipation of the LPA decision, the City Council Transportation Committee conducted a series of public hearings out in the districts throughout the primary transportation corridor after the MIS/DEIS was distributed.</p> <p>After the LPA was selected, the City Council asked the DTS to continue public dialogue on the project. Community working groups were formed to provide a forum for open dialogue between project sponsors and neighborhood, civic, business and other organizations so that environmental and transportation issues and refinements to project proposals could be discussed. Five working groups were formed and several meetings held with each group regarding the project. As a result of the working groups, the SD/DEIS has resulted to address the project refinements resulting from the working groups' efforts.</p> <p>In addition to the working groups, the project team members have been meeting with numerous individuals, agencies, and organizations. Over 100 meetings have been conducted since January 2001.</p>	<p>The City Council's Transportation Committee Chair was also the chair of the Oahu Metropolitan Planning Organization (OMPO) which is the lead government agency for projects needing federal funding and whose Policy Committee lacked actual and real public participation as public records will show. He was a strong supporter of the In-Town BRT alternative only.</p> <p>The City Council's Transportation Committee Chair was also the chair of the Oahu Metropolitan Planning Organization (OMPO) which is the lead government agency for projects needing federal funding and whose Policy Committee lacked actual and real public participation as public records will show. He was a strong supporter of the In-Town BRT alternative only.</p> <p>The five (5) working groups selected mostly included individuals who were not familiar with other alternative mass transit systems available but were supporters of the In-Town BRT. They consisted of about 15 individuals, more or less, and their meetings were not advertised for volunteers and I never heard about them until their results were published in OahuTrans 2K reports or in small articles in daily newspapers.</p>
<p>Was it a done deal to guide the process from the beginning by the City's Department of Transportation and its hired consultants to put the Bus Rapid Transit (BRT) as a preferred final choice somehow by eliminating a superior grade-separated light rail alternative?</p>	<p>It is a federal requirement that all alternatives be treated in a balanced manner and the DEIS has been reviewed to ensure that this "balanced treatment" requirement is met. Even at this point in the process, there is no foregone conclusion that the BRT Alternative would be implemented. Until there is a completed Record of Decision (ROD), the preferred alternative is not for certain. After the ROD is issued, construction funding will be procured to implement the</p>	<p>I firmly believe the City's Department of Transportation Services did not ensure that this "balanced treatment" was given to meet the federal treatment requirement that all alternatives were treated in a balanced manner. As it was the Locally Preferred Alternative in 1992 somehow someone made the determination to remove the grade-separated elevated alternative before Round 1</p>

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Comments	Responses	Additional Comments to Responses
portion of the corridor.	signal will activate an extension of the green indication for that cycle only. BRT vehicles stopped at a red signal will move concurrently with the through traffic in the same direction, unless the BRT vehicle must turn or change lanes, in which case it will be given a green signal in advance of the general purpose traffic lanes. All traffic signal extensions and advance indications will be timed in the field during actual operation to minimize effects on general traffic flow.	Effects on general purpose and pedestrian traffic is key to avoiding traffic and pedestrian backups which will happen with all the things going on at practically all street intersections in Downtown during peak times and where traffic volume has been made worse with lost or limited auto traffic lanes. With car, resident and tourist population always on the increase situation will only get worse in the future.
Decrease of the use of narrow platforms because of very narrow street rights-of-way the so-called transit stations will not eliminate the need to restrict boarding to the front door of the bus which takes additional time.	The transit stops will be designed to efficiently handle the expected volume of passengers.	Not much can be done to speed loading and unloading at BRT transit stations which will create delays in transit times as space is limited. Vancouver's Skytrain permits entry and exits through three (3) doors efficiently.
System integration becomes an issue when the need to provide transfers between routes and other forms of public transportation where passengers pay fares at these transfer points with on board payment.	The BRT system will be seamlessly integrated into the hub-and-spoke bus network by implementing well-planned stops, efficient dwell times and a stream-lined fare collection and transfer system to provide convenient and cost-effective service for potential users.	Not much of a problem with the hub-and-spoke bus is outlying areas but integration of BRT transit stations will be with limited space at proposed transit stations and single entry/exit to BRT vehicle.
The DEIS does not give details on the impact with the loss of one and in most cases two lanes of multi-purpose traffic lanes within the proposed corridor.	See Chapter 4 of the MIS/DEIS for the discussion of traffic related impacts.	No quantitative numbers are given in Chapter 4 of MIS/DEIS for discussion on numbers of cars displaced only that there will be more transit riders. BRT has many limitations.
Giving priority to the proposed BRT will cause additional delays at cross streets and pedestrian cross-walks creating additional traffic congestion at these locations.	Traffic signals will not be pre-empted by the BRT. At certain intersections, BRT vehicles approaching a green signal will activate an extension of the green indication for that cycle only. BRT vehicles stopped at a red signal will move concurrently with the through traffic in the same direction, unless the BRT vehicle must turn or change lanes, in which case it will be given a green signal in advance of the general purpose traffic lanes. All traffic signal extensions and advance indications will be timed in the field during actual operation to minimize effects on general traffic flow.	The addition of an In-Town BRT to existing auto traffic including right/left turn-lanes and pedestrian traffic only adds to complexity of another use at each and every intersection. This is another reason of unreliable/slow transit times further delayed by potential accidents, underground infrastructure problems and many others than a system with its own guide way. Comparing cost with Vancouver's Millennium Line addition coupled with strong U.S. dollar and weaker Canadian dollars is worth a look.
A grade-separated light rail system would be the most to improve the capacity of the transportation system to carry people through Honolulu as the population thrives through 2025.	A fully grade-separated transit system was considered and rejected since it was determined at the outset that the public was not in favor of an elevated transit system due to its high cost and its physical and visual impact. This is	Public did support the proposed system as it was proposed in 1992. It was the Honolulu City Council who down-voted it. Today the grade-separated technology is very different

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Comments	Responses	Additional Comments to Responses
The need to allow general purpose traffic to use a bus lane for turning interferes with bus operations, increasing travel times and adding to problems of enforcing the restriction of the lane to buses under all other circumstances.	The BRT system strives to strike a balance between transit speed and impacts to general traffic. In segments where it was judged that roadway capacity was needed for general traffic and the BRT operation would not be significantly impacted exclusive lanes were replaced by either semi-exclusive or mixed-flow operation. In areas of high BRT ridership volume, exclusive transit lanes were retained such as on Kapiolani and through Downtown.  The BRT lanes will be clearly delineated and signed. Since large, specially marked BRT vehicles will be utilizing these lanes it will be obvious which vehicles are violators and therefore it will not take much law enforcement manpower to monitor and enforce the lane designation. There will be no enforcement mechanisms developed to discourage private vehicles from entering BRT-exclusive lanes. These enforcement mechanisms may be in the form of a fine for entering a BRT-exclusive lane, similar to the fines imposed on the existing HOV lanes.	This mix of exclusive, semi-exclusive BRT and mixed-use lanes are each a part of the problem of a BRT system. It would help but we don't have the luxury of wide street rights-of-ways.  I see constant changes to try to balance a workable In-Town BRT with new problems with fewer auto traffic lanes, pedestrian crosswalks, left-turn lanes, traffic back-ups and some traffic grid-lock along with many disgruntled drivers as well as unhappy BRT and bus riders. Especially the ones who have to transfer to the In-Town BRT segment who find out it actually is slower than what was said by the City and its commitments. The In-Town transit stations are far from being comfortable without conveniences and limited in space/seating as I see in the plans because of our narrow street rights-of-ways.
Curbside parking by emergency, delivery, and service vehicles also obstructs bus movements and is particularly disruptive if the bus lane is restricted to a single lane width.	The two technologies under consideration, the Embedded Plate System and the Hybrid Propulsion System both provide the flexibility to operate outside of the designated BRT lanes.  Therefore, the BRT vehicles would bypass the vehicle that is parked along the curb by maneuvering around the vehicle.	However the changing of vehicles from diesel powered to another technology being suggested will add to the cost of the system. Bus transit is not as smooth and comfortable as a rail system which is much quicker being always on time in fact and every transit station. Accidents will occur as any at-grade transportation system has shown.
A drawback of median bus lanes is that passengers must walk across general purpose traffic lanes to reach the bus stop.	The conceptual design of transit stops located in the median includes features such as railings to discourage transit patrons from exiting the platform except at designated locations. Traffic signals and crosswalks will be provided at BRT stations to allow pedestrians to safely cross the street.	Potential for accidents to happen is still there. Today cross walk signals are ignored by many with lots of jaywalking and running. There is liability with all at-grade traffic situations that possibly will happen sooner or later.
The constraints imposed by traffic signal progression will limit effective application of signal progression along the In-Town	Traffic signals will utilize prioritization for BRT vehicles not pre-emption. At certain intersections, BRT vehicles approaching a green	Potential for accidents to happen is still there. Today cross walk signals are ignored by many with lots of jaywalking and running

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Comments	Responses	Additional Comments to Responses
deterioration of transit travel times. Maintenance and construction projects under way within the proposed BRT corridor has potential of nearly shutting down the system sometime in the future if implemented.	The provisions to accommodate maintenance and construction projects within the BRT corridor will be similar to how construction projects within a lane are handled currently - the traffic will be detoured around the construction/maintenance area. The two technologies under consideration the Embedded Plate System, and the Hybrid Propulsion System both provide the flexibility to operate outside of the designated BRT lanes.	A grade-separated elevated light rail system does not ever have to contend with disruption of service with its own guideway. Some of the other technologies suggested are not available today and would add to the cost of the In-Town BRT. BRT detours may be possible if distance is not beyond the limits of the suggested vehicle (s).
Under the Bus Rapid Transit (BRT) alternative because there has been lack of the subject of comparable effort in North America this newer transit alternative application for success is not really known except in Curitiba, Brazil which is very different being under the control of a dictatorship.	The BRT is based on the most ubiquitous technology around the world, -the bus. It has been continuously improved and updated with BRT being the most recent application of this proven technology. The key BRT features being proposed in Honolulu have been tested and proven in cities throughout the world including Curitiba and Sao Paulo, Brazil; Brisbane and Adelaide, Australia; Auckland, New Zealand; Vancouver and Ottawa, Canada; Dublin Ireland; Nagoya, Japan; New York City, Los Angeles, Pittsburgh, and Orlando in the U.S.	The bus has improved to current BRT technology but application is done differently in cities that have used it. An example is that BRT technology is also to add or supplement existing transit systems already in place. An example is the one in Vancouver, British Columbia which is used to bring transit riders from outlying areas around the city of Vancouver to use the fast and very comfortable Skytrain. Rouen and Lyon, France use BRT similarly.
Narrow bus stops and limited availability of park and ride facilities are not better able to handle surges in ridership due to possible changes in land use policies in central Oahu, special events and sporting events easily.	The design of the BRT system and transit stops will be able to accommodate peaks in ridership due to special events. For example, to accommodate transit patrons attending a UH football game at Aloha Stadium, the City would coordinate with the Stadium Authority prior to the event to identify alternative parking sites where fans could park and utilize the BRT to attend the game.  The current land use plans for Central Oahu and resulting increase in transit ridership was taken into account in the planning of the BRT project.	Narrow transit stops shown in preliminary cross sections of transit stops are what they are bus stops. Many are shown to be 11 feet in width, but probably less, with no human amenities and conveniences like Skytrain's with elevators and escalators to get you there to the platform with even a place for light snacks, a book to read or to make a phone call.
More transfers would be needed for both the In-Town BRT and a grade-separated light rail system due to the proposed hub-and-spoke-bus network.	The BRT system will be seamlessly integrated into the hub-and-spoke bus network by implementing well-planned stops, efficient dwell times and a stream-lined fare collection and transfer system to provide convenient and cost-effective service for potential users.	With the In-Town BRT alternative or even with a grade-separated elevated light rail alternative there is no other way. The hub-and-spoke concept helps to efficiently bring in transit riders from communities outside downtown.
Today's grade-separated light rail vehicles have noise emissions comparable to those of an electric trolley bus.	There are still many noise factors to be considered associated when designing a rail system. Steel wheels on steel rail require	Vancouver's Skytrain vehicles are exceptionally quiet. An argument by the City's Department of Transportation show lack of

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Comments	Responses	Additional Comments to Responses
Because of its exclusive guideway would increase the mode share of transit more than any other alternative travel time savings for transit patrons, providing more reliable service that would be buffered from traffic delays, improving in-town mobility and strengthening the connections throughout the island of Oahu.	A fully grade-separated transit system was considered and rejected since it was determined at the outset that the public was not in favor of an elevated transit system due to its high cost and its physical and visual impacts. This is discussed in Chapter 2.6.1 of the MIS/DEIS.	using new techniques to install guideway members during construction phase.  Public did support the proposed system in 1992 and chosen as the Locally Preferred Alternative (LPA) as shown in the DEIS in pages on Comments and Responses. A visit to Vancouver to discuss costs is suggested to make real comparison for the best In-Town system once and for all.
The notion of the exclusive right-of-way for the grade-separated light rail would provide significantly faster travel times within Honolulu.	A fully grade-separated transit system was considered and rejected since it was determined at the outset that the public was not in favor of an elevated transit system due to its high cost and its physical and visual impacts. This is discussed in Chapter 2.6.1 of the MIS/DEIS.	Public did support the proposed system in 1992 and chosen as the Locally Preferred Alternative (LPA). The grade-separated technology is different from 1992 and from costs of the Millennium Line much more affordable with weaker Canadian dollar.
The current at-grade situations of pedestrians, automobile traffic, traffic lights, emergency vehicles, construction and repairs of underground utilities below the exclusive lanes of the BRT, traffic accidents, long stops because of passenger loading limitations, exceptional narrow bus stops, and more time between vehicles don't help the situation.	The BRT system is an at-grade system and as such does interface with other features at that level. However, the two candidate technologies, the Embedded Plate System and the Hybrid Propulsion System, both provide the flexibility to operate outside of the designated BRT lanes and therefore can easily maneuver around construction areas, emergency vehicles, and traffic.	Every type of an at-grade transit system requires a driver (s) up front as the In-Town BRT needs. Vancouver's Skytrain does not need a driver. Security has been upgraded with the Millennium Line to include glass-enclosed transit stations as the public have asked during comment period on the addition.
Additionally monitoring of both exclusive and shared lanes with the BRT will be a problem and more adjustments to satisfy problems with the communities nearby, currently going on, will cause additional mediation with a Bus Rapid Transit System to further deteriorate the word "rapid."	The BRT lanes will be clearly delineated and signed. Since large, specially marked BRT vehicles will be utilizing these lanes it will be obvious which vehicles are violators and therefore it will not take much law enforcement manpower to monitor and enforce the lane designations. There will be some enforcement mechanisms developed to discourage private vehicles from entering BRT-exclusive lanes. These enforcement mechanisms may be in the form of a fine for entering a BRT-exclusive lane, similar to the fines imposed on the existing HOV lanes.	Enforcement of violations of exclusive lanes for the In-Town BRT is just another problem with this at-grade transit proposal. The mix of regular buses with the In-Town BRT and auto traffic among other things add to at-grade traffic situations that will occur every day.
Lack of sufficient cross-section of streets of the corridor creates very narrow bus stops which also prevent faster on-board loading of passengers with a single front entry for verification of fares paid providing further	The transit stops will be designed to efficiently handle the expected volume of passengers.	Lack of wide street right-of-way in Downtown Honolulu is another negative for the In-Town BRT. Narrow and long transit stops mostly can only be built.

Comments	Responses	Additional Comments to Responses
	<p>New York City, Los Angeles, Pittsburgh, and Orlando in the U.S.</p> <p>If you are referring to the "mainline alternative" being the consideration of the a grade-separated light rail system, fully grade-separated transit system was considered and rejected since it was determined at the outset that the public was not in favor of an elevated transit system due to its high cost and its physical and visual impacts. This is discussed in Chapter 2.6.1 of the MIS/DEIS.</p>	<p>The missing alternative is a blunder and I feel the taking away of car lanes or mixing the BRT with cars will cause quicker traffic gridlock. We love our cars and unless public transit is made much faster than the bus and with many human comforts and conveniences the In-Town BRT will not be successful as some politicians and advocates are suggesting.</p>
A grade-separated light rail can be fast, convenient, reliable, and the right choice among all other alternatives.	A fully grade-separated transit system was considered and rejected since it was determined at the outset that the public was not in favor of an elevated transit system due to its high cost and its physical and visual impacts. This is discussed in Chapter 2.6.1 of the MIS/DEIS.	On the onset from Round 1 of Trans 2k right away I noticed no grade-separated light rail alternative. I cannot see any at-grade vehicle both the In-Town BRT or the at-grade LRT as the best choice among the alternatives. A potential blunder could be happening here.
Building a grade-separated line for the In-Town portion will create many jobs and is a good investment in our city's future.	<p>A fully grade-separated transit system was considered and rejected since it was determined at the outset that the public was not in favor of an elevated transit system due to its high cost and its physical and visual impacts. This is discussed in Chapter 2.6.1 of the MIS/DEIS.</p> <p>The BRT Alternative will generate jobs related to the operations of the BRT system such as transit drivers and operations and maintenance personnel. Along with transit needs, one of the other goals of the PCTP is to help shape growth in the corridor. The large, underdeveloped parcels along the alignment present opportunities for transit oriented development at these sites, which will result in the creation of jobs.</p>	Both the In-Town BRT and an In-Town grade-separated light rail system will create many jobs. Both will provide growth in, along and around the corridors. However, costs with no need for transit drivers for an elevated system can be a yearly savings which brings down the actual cost of such a system over the long term. More technical and jobs related to the rail system as computers and electronics run the vehicles. Maintenance, as shown by Vancouver's Skytrain engines, having no moving parts rarely need any work making it one of the most reliable and quietest options in the world.
Because it runs on its own tracks, separated from roads this transit system eliminates conflicts that are frequent on the road systems.	A fully grade-separated transit system was considered and rejected since it was determined at the outset that the public was not in favor of an elevated transit system due to its high cost and its physical and visual impacts. This is discussed in Chapter 2.6.1 of the MIS/DEIS.	Again the public did have a say, as shown in the DEIS of the 1992, had the alternative chosen was a different and longer corridor of a grade-separated rail system which is different from the technology of today's Millennium Line in Vancouver, B.C.

Comments	Responses	Additional Comments to Responses
	<p>mitigation for brake squeals, vehicle vibration, and electronic propulsion tones. The noise severity will be dependent on the speed of the vehicles, the weight of the vehicles, the type of suspension used in the vehicles, and the track foundations. The costs associated with mitigation can be substantial.</p> <p>The two candidate technologies, the Embedded Plate and Hybrid Propulsion Systems are quieter than the diesel buses currently used.</p>	<p>knowledge or any research done on current modern technology of the latest grade-separated light rail systems which do not require any additional costs to mitigate noise control of any kind as being suggested. Also the vehicles in Vancouver's grade-separated system do not use drivers and have a perfect safety record since inception in 1986.</p>
Today's grade-separated light rail vehicles use far less power than other rapid transit systems and releases no harmful chemicals into our atmosphere.	<p>Technologies proposed for the BRT Alternative include the embedded plate technology which consists of electric vehicles powered by a wayside traction power delivery system or hybrid propulsion system where energy for the traction power is carried on-board the vehicle. The Embedded Plate technology vehicles would emit zero pollutants. The hybrid electric vehicle would be low-emission vehicles because their diesel engines would always be operating at efficient levels.</p> <p>Since the BRT Alternative would utilize either zero or low-emission vehicles, it would substantially reduce the level of particulate emissions (black smoke and soot) at certain intersections and street level locations in comparison to the No-Build and TSM Alternatives, which would continue to use diesel buses.</p>	Both technologies proposed for the In-Town BRT are not really available today. But Vancouver's Skytrain Millennium Line cost of \$762.3 million includes costs of all next generation electric cars which are built in Burnaby, British Columbia on the west coast of Canada. Also no drivers are used as they are automatically driven and under control from a primary location. Substantial savings are derived without a driver(s) for each pair of vehicles.
Fully automated and driverless grade-separated light rail vehicles can run more frequently than any BRT vehicle peak and non-peak hours.	A fully grade-separated transit system was considered and rejected since it was determined at the outset that the public was not in favor of an elevated transit system due to its high cost and its physical and visual impacts. This is discussed in Chapter 2.6.1 of the MIS/DEIS.	Public did support the proposed system in 1992 and chosen as the Locally Preferred Alternative (LPA). The City Council down-voted it by a single vote. I can't understand why the public didn't vote for the choices.
Because of lack of a comparable effort for a Bus Rapid Transit System on the mainland and even in Europe I see a missing alternative that should have been considered fairly for all taxpayers.	The BRT features being proposed in Honolulu have been tested and proven in cities throughout the world including Curitiba and Sao Paulo, Brazil; Brisbane and Adelaide, Australia; Auckland, New Zealand; Vancouver and Ottawa, Canada; Dublin Ireland; Nagoya, Japan;	Again I say BRT technology has evolved but applications vary but most are to complement or add to an already existing transportation system as the use of BRT in Vancouver's Skytrain grade-separated light rail system.

DEPARTMENT OF TRANSPORTATION SERVICES  
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TPD502-01724R  
TPD502-01860R

November 13, 2002.

Mr. Wendell Lum  
45-135 Lilipuna Road  
Kaneohe, Hawaii 96744

Dear Mr. Lum:

Subject: Primary Corridor Transportation Project

This is a combined response to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your October 5, 2000 letter, your oral testimony at the October 5, 2000 Special Transportation Committee Meeting, your October 12, 2000 letter, and your oral testimony at the October 12, 2000 Public Hearing regarding the MIS/DEIS. Part B responds to your May 1, 2002 letter and your May 6, 2002 letter in response to the letter you received on your SDEIS EISPN comments dated March 8, 2002 regarding the SDEIS.

Part A - MIS/DEIS Comments

1. Suggest looking into a faster alternative, an automated people mover (APM) system, which is a light rail transit system but very quiet, not creating traffic congestion by not taking away lanes of traffic with high speed that only a grade-separated exclusive right-of-way can give and guaranteed to take cars off the road by cutting public transportation time significantly with 66 mph maximum speed and in much more comfort and driverless, being fully automated.

Response: As discussed in Section 2.8.1 of the MIS/DEIS and this FEIS, an elevated system was rejected by the public and City Council at the outset of the project because of its unsightliness and high cost.

2. I'm against this BRT project.

Response: Comment noted. It states the commissioner's preference for the LPA.

3. I'm suggesting that the department or the City should go back and look at the automated people mover system.

Response: See response to comment #1.

4. It's faster and it's automatic and actually it's a light-rail system but very quiet, not creating traffic congestion by not taking away lanes of traffic, with high speed and only a grade-separated exclusive right-of-way can give and guarantee to take cars off the road which I doubt this in-town BRT will do because we love our cars and it's time consuming making transfers.

Mr. Wendell Lum  
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Response: See response to comment #1.

5. The draft EIS talks about 47% of people board the bus when we try to get on BRT will be involved in transfers maybe two or three transfers. And that's very time consuming.

Response: The operations plan has been refined to reduce the amount of transferring required between the Regional and In-Town BRT. Also, with a hub-and-spoke system, many connections will take place at transit centers where buses are scheduled to meet at a prescribed time to minimize the wait time for transferring passengers. The travel time savings including the transfers, with the Refined LPA will, in most cases, be faster than the existing system.

6. Grade-separated vehicles can go up to ... The one in Vancouver has speeds up to 56 miles an hour and is much more comfortable and is automatic and it has a magnetic type of technology. There's no gears and it's quiet and it's well received. Workable there's lots of cities that have accepted and have gone ahead with construction.

Response: See response to comment #1.

7. According to the Oahu Regional Transportation Plan, Preliminary Model Run Statistics, Daily Vehicle Delay (000s of hours) comparing year 2000 to year 2025 traffic congestion on all streets and highways will be severe. That's just another reason why I strongly feel a grade separated option for public transit similar to the existing and expanding Vancouver Skytrain system in Vancouver, Canada.

Response: Year 2025 forecasts indicate that there will be traffic congestion on major traffic arteries regardless of the transit technology. The Refined LPA will permit transit riders to reduce delays from being caught in this congestion wherever the BRT is given priority treatment.

8. Because it runs on its own tracks, separated from roads, Skytrain eliminates conflicts that are frequent on the road system. And for that reason, it's almost always on time.

Response: Priority lanes for the BRT will also make the system better able to maintain schedule adherence.

9. The engines on Skytrain, the linear induction motors, have no moving parts and rarely need maintenance, making the system one of the most reliable options in the world.

Response: See response to comment #1.

10. Skytrain uses only one kilowatt-hour of electricity per 5.9 passenger miles - about the same amount of power it takes to run a color television for three hours, and far less than other rapid transit systems.

Response: The motive power costs of the EPT are also very low.

11. It's quieter than most vehicles. Skytrain's noise emissions are comparable to those of an electric trolley bus.

Response: The noise levels of both the EPT and hybrid-electric propulsion systems would also be very low.

Mr. Wendell Lum  
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12. Skytrain produces no air pollution.

Response: There will be no mobile source emissions from the embedded-plata propulsion system.

13. Skytrain fully automatic cars do not have drivers and can run frequently as one-and-a-half minutes apart.

Response: The trade-off for installing such a system is the cost of the exclusive right-of-way. An exclusive right-of-way is not an option for the In-Town BRT due to prohibitive construction costs and visual impacts.

14. According to OMPPO's consultant, comparing the years 2000 and 2025, traffic congestion on all streets and highways will be very severe. This is just the reason why I strongly feel that a grade-separated option for public transit similar to the existing and expanding Vancouver Skytrain system in Vancouver, Canada.

Response: See response to comment #1.

15. Because it runs on its own tracks, separated from roads, Skytrain eliminates conflicts that are frequent on the road system. And for that reason, it's almost always on time.

Response: See response to comment #8.

16. The engines on Skytrain, the linear induction motors, have no moving parts and rarely need maintenance, making the system one of the most reliable options in the world.

Response: See response to comment #1.

17. Skytrain uses only one kilowatt-hour of electricity per 5.0 passenger miles -- about the same amount of power it takes to run a color television for three hours, and far less than other rapid transit systems in the world.

Response: See response to comment #1.

18. It's quieter than most vehicles. Skytrain's noise emissions are comparable to those of an electric trolley bus, produces no air pollution, and is fully automatic and is driverless and runs frequently as one and a half minutes apart.

Response: See response to comment #11.

19. What I'm trying to summarize, I don't think the BRT system will do away with congestion. It will add to the congestion of our streets.

Response: See response to comment #1.

20. And a system like the Skytrain is really affordable, and I think we should invite people from like, say, the construction company to Hawaii, and so we can get an idea on the cost.

Mr. Wendell Lum  
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Response: The transit system proposed for Honolulu in the 1990s utilized the same technology as Vancouver's Skytrain. One of the reasons it was eventually rejected by the City Council was that it was too costly (it would have required raising taxes), and it was unsightly.

21. I believe -- you know, I know the City has spent several million dollars, maybe eight million dollars, but I think it's well worth to investigate the light rail option.

Response: See response to comment #1.

22. And because the vision is very short, I think it has to look into the future, and I think this is the only way to go.

Response: Comment noted.

#### Part B - SDEIS Comments

23. Another faster and much more comfortable mass transit alternative for the In-Town portion of the Primary Corridor Transportation Project for a grade-separated light rail system was left out with a poor explanation in the MIS/Draft EIS. Compare the 1992 proposal of a 15.9 mile grade separated rail system which was projected to cost over a \$1 billion U.S. dollars and the current the In-Town BRT of about 12 miles will cost maybe around \$400 million.

Response: A grade separated system was rejected at the outset by the public and City Council as being too costly and unsightly. Selection of a Locally Preferred Alternative has already been made.

24. The latest grade-separated technology now has a less intrusive elevated guide way. An example is the Vancouver Skytrain In Vancouver, British Columbia. An addition of 12.6 mile that is projected for completion after less than three (3) years on September 2002 and announced it will be completed with a surplus on April 16, 2002. The In-Town BRT portion costs are hypothetical yet and definitely more with a suggested long term plan and newer technology in the future.

Response: See response to comment #23.

25. The Millennium Line includes construction of 13 architect designed glass enclosed transit stations with elevators/escalators, a twin 2500 feet tunnel which Honolulu does not require and twenty (20) pairs of next generation MK II Skytrain cars (260 passengers a pair) at a cost of below \$762.5 million U.S. dollars. Guideway construction began in 1999 with MK II cars produced in Burnaby, B.C.

Response: See response to comment #23.

26. The MIS/Draft EIS of August 2000 (pg. 2-42) states that an 11.8 mile elevated rapid transit system along the presently proposed In-Town BRT alignment would cost on the order of \$1.6 billion in 1998 dollars and by comparison, the In-Town BRT system costs are estimated at around \$375 million in 1998 dollars but which since has been increased with the Supplemental Draft EIS of March 2002.

Response: See response to comment #23.

27. A shorter grade-separated light rail system from the proposed Middle Street Transit Station to the University of Hawaii without a Weikiki corridor can make it affordable and expandable in the future. Private local transportation companies can utilize the Hub and Spoke concept off Transit Stations(s) to do Weikiki also.

Response: See response to comment #23.

28. From Rounds 1 and 2 of Oahu Trans 2K public meetings there were displays/models/sketches of the Bus Rapid Transit Proposal, No-Build, Enhanced Bus/Transportation System Management (TSM), and Light Rail Transit (LRT) but nothing of a grade-separated transit system not even the model produced from the older previous defunct 1992 15.9 mile proposal which was the overwhelming locally preferred alternative (LPA) then but down voted by a single vote by the then Honolulu City Council.

Response: A grade separated system was rejected early on in the PCTP by the public and City Council as being too costly and unsightly. Selection of a Locally Preferred Alternative has already been made.

29. Critical community concern which was not explained in detail from the onset and other public meetings and also in the MIS/DEIS of Primary Corridor Transportation Project of August 2000 is the impact of what the host of one and in many cases two lanes of auto traffic lanes and in many cases only a single lane of auto traffic each way on existing major street rights-of-ways.

Response: Chapter 4 of the FEIS fully discusses the consequences of converting selected general purpose lanes to priority use by transit vehicles. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

30. An inventory of the participants in public meetings held by the City's Department of Transportation Services will show much less than 1% of the population of Honolulu's residents were participants. A significant amount of persons who were in attendance were repeaters, like myself, and form the City and County of Honolulu's Neighborhood board system and participants in the Mayor's Vision teams throughout the City and County of Honolulu. Many other local meetings had poor attendance as public records will show.

Response: The Primary Corridor Transportation Project has had one of the most extensive public outreach efforts ever undertaken on Oahu.

31. The City Council's Transportation Committee Chair was also the chair of the Oahu Metropolitan Planning Organization (OMPO) which is the lead government agency for projects needing federal funding and whose Policy Committee lacked actual and real public participation as public records will show. He was a strong supporter of the In-Town BRT alternative only.

Response: Comment noted.

32. The five (5) working groups selected mostly included individuals who were not familiar with other alternative mass transit systems available but were supporters of the In-Town BRT. They

consisted of about 15 individuals, more or less, and their meetings were not advertised for volunteers and I never heard about them until their results were published in Oahu Trans 2K reports or in small articles in daily newspapers.

Response: Each working group consisted of 30-40 invitees representing neighborhood boards, transportation and environmental organizations, elected officials, government agencies, business people, private transportation providers, etc. Working group members reflected a broad cross section of stakeholders in that particular section of the corridor, including many people who had voiced criticisms of the LPA.

33. I firmly believe the City's Department of Transportation services did not ensure that this "balanced treatment" was given to meet the federal requirement that all alternatives were treated in a balanced manner. As it was the Locally Preferred Alternative in 1992 somehow someone made the determination to remove the grade-separated elevated alternative before Round 1 of the Trans 2K public meetings. It may be a blunder of the decade by the current Honolulu City Council and the Department of Transportation Services. The public was never given a chance either by vote or before the Trans 2K meeting began. It was determined before that.

Response: The Trans 2K meetings explored all the transportation alternatives. The meeting attendees collectively decided very early on that they did not want a grade separated public transportation system.

34. The obstacles are many as all at-grade transit alternatives encounter. The In-Town BRT is a short-term help but quickly will add to the traffic gridlock as it takes away lanes of auto traffic. The speed as suggested and shown on video by the City's consultants are hypothetical and shown overlaid on motion pictures without any or real automobile traffic.

Response: See response to comment #29.

35. The variations possible of BRT technology is not well defined for applications that will vary from city to city. But Vancouver, British Columbia in the west coast of Canada has a form of BRT technology but is used only to complement the existing Grade-Separated Elevated Vancouver Skytrain System and not by itself as Honolulu's proposal. Vancouver is enjoying success with its transportation system.

Response: The BRT will be one component in Honolulu's transportation system, which includes highways, the hub-and-spoke transit system - currently being implemented, private transportation providers, taxis, CityExpress, TheHandiVan, etc.

36. This mix of exclusive, semi-exclusive BRT and mixed-use lanes are each a part of the problem of a BRT system. Where are these cars who use the above lanes go? We have many close-by crossing streets which cars today use and there will be more cars in the future and the next generation. There are traffic lights at practically every intersection and high pedestrian traffic in Downtown. It would help with wide street rights-of-way.

Response: See response to comment #29.

37. I see constant changes to try to balance a workable In-Town BRT with new problems with fewer auto traffic lanes, pedestrian crosswalks, left-turn lanes, traffic back-ups and some traffic grid-lock along with many disgruntled drivers as well as unhappy BRT and bus riders. Especially the ones who have to transfer to the In-Town BRT segment who find out it actually is slower than what was

said by the City and its consultants. The In-Town transit stations are far from being comfortable without conveniences and limited in space/seating as I see in the plans because of our narrow street rights-of-ways.

Response: None of the prognostications cited are forecast to occur with the Refined LPA. The In-Town BRT stops will be substantially larger than existing bus stops. They will be able to accommodate the projected passengers at a high level of comfort, typically at over 15 square feet per passenger (LOS B). Ample seating, overhead covering from sun and rain, information kiosks, and other conveniences will be part of the amenities at each BRT stop. Transit centers will have additional amenities such as restrooms and vending machines.

38. However, the changing of vehicles from diesel powered to another technology being suggested will add to the cost of the system. Bus transit is not as smooth and comfortable as a rail system which is much quicker being always on time at each and every transit station. Accidents will occur as any at-grade transportation system has shown.

Response: There are certainly some positive attributes to grade separated transit. In Honolulu, however, these positive attributes have been weighed against the disadvantages and an at-grade BRT system has been selected as the LPA.

39. Potential for accidents to happen is still there. Today cross walk signals are ignored by many with lots of jaywalking and running. There is liability with all at-grade traffic situations that possibly will happen sooner or later.

Response: In certain locations where jaywalking pose a safety hazard, measures will be taken to mitigate against it. For example, along S. King Street near Iolani Palace it is proposed to install a barrier, consisting of decorative bollards with chains connected between them, along the edge of the sidewalk next to the curb to discourage jaywalking.

40. Effects on general purpose and pedestrian traffic is key to avoiding traffic and pedestrian backups which will happen with all the things going on at practically all street intersections in Downtown during peak times and where traffic volume has been made worst with lost or limited auto traffic lanes. With car, resident and tourist population always on the increase situations will only get worse in the future.

Response: See response to comment #28.

41. Not much can be done to speed loading and unloading at BRT transit stations which will create delays in transit times as space is limited. Vancouver's Skytrain permits entry and exits through three (3) doors efficiently.

Response: Boarding and alighting will be much easier with the In-Town BRT. Passengers will be able to get on-and-off from a platform that is at the same height as the bus floor (13 inches) so that there will be no steps to negotiate. Also, because there will be prepayment of fares, passengers will be allowed to both enter and leave from any of 2 or 3 doors on the articulated buses. Passengers in wheelchair and scooters will be able to board and alight directly without the use of a lift. Passengers with baby strollers will also find it much easier to get on-and-off the bus. The net effect of these features is that dwell time at stops will be less.

42. Not much problem with hub-and-spoke bus in outlying areas but integration at BRT transit stations will be with limited space at proposed transit stations and single entry/exit to BRT vehicles.

Response: See responses to comments #37 and #41.

43. No quantitative numbers are given in Chapter 4 of MIS/DEIS for discussion on numbers of cars displaced only that there will be more transit riders. BRT has many limitations.

Response: Chapter 4 of the FEIS quantifies the number of autos diverted to transit.

44. The addition of an In-Town BRT to existing auto traffic including right/left turn lanes and pedestrian traffic only adds to complexity of another use at each and every intersection. This is another reason of unrelaisable/slow transit times further delayed by potential accidents, underground infrastructure problems and many others than a system with its own guide way. Comparing cost with Vancouver's Millennium Line addition coupled with strong U.S. dollar and weaker Canadian dollars is worth a look.

Response: See response to comment #28.

45. Public did support the proposed system as it was proposed in 1992. It was the Honolulu City Council who down-voted it. Today the grade-separated technology is very different using new techniques to install guide way members during construction.

Response: See response to comment #28.

46. Public did support the proposed system in 1992 and chose as the Locally Preferred Alternative (LPA) as shown in the DEIS in pages on Comments and Responses. A visit to Vancouver to discuss costs is suggested to make a real comparison for the best In-Town system once and for all.

Response: See response to comment #28.

47. The grade-separated technology is different from 1992 and from costs of the Millennium Line much more affordable with weaker Canadian dollar.

Response: See response to comment #28.

48. Every type of an at-grade transit system requires a driver(s) up front as the In-Town BRT needs. Vancouver's Skytrain does not need a driver. Security has been upgraded with the Millennium Line to include glass-enclosed transit stations as the public have asked during comment period on the addition.

Response: See response to comment #28.

49. Enforcement of violations of exclusive lanes for the In-Town BRT is just another problem with this at-grade transit proposal. The mix of regular buses with the In-Town BRT and auto traffic among other things add to at-grade traffic situations that will occur every day.

Response: The need for enforcement has been taken into consideration in the planning for the Refined LPA, and will be followed through in development of the operations plan during the final design and implementation stages.



50. Lack of wide street rights-of-way in Downtown Honolulu is another negative for the In-Town BRT. Narrow and long transit stops mostly can only be built.

Response: The proposed transit stops are designed to efficiently and comfortably accommodate the boarding, alighting, and waiting of BRT passengers.

51. A grade-separated light rail system does not ever have to contend with disruption of service with its own guideway. Some of the other technologies suggested are not available today and would add to the cost of the In-Town BRT. BRT detours may be possible if distance is not beyond the limits of the suggested vehicle(s).

Response: Actual experience of elevated rail systems show evidence contrary to the assertion that it does not have to contend with disruption of service. Since they operate on fixed tracks any mechanical problem with one vehicle can have serious impacts on operations for hours. In contrast, the proposed BRT, since it is rubber-tired at-grade will have the flexibility to go around any blockage.

52. The bus has improved to current BRT technology but application is done differently in cities that have used it. An example is that BRT technology is also to add or supplement existing transit systems already in place. An example is the one in Vancouver, British Columbia which is used to bring transit riders from outlying areas around the city of Vancouver to use the fast and very comfortable Skytrain. Rouen and Lyon, France use BRT similarly.

Response: Comment noted.

53. Narrow transit stops shown in preliminary cross sections of transit stops are what they are bus stops. Many are shown to be 8 feet in width, but probably less, with no human amenities and conveniences like Skytrains' with elevators and escalators to get you there to the platform with even a place for light snacks, a book to read or to make a phone call.

Response: The In-Town BRT stops will be a minimum of 8-foot wide, and wider wherever the conditions permit. Since no elevators or escalators are required to reach the platform, this is ample width for passengers to get on-and-off the buses, circulate and wait. There will be seating provided along with other amenities including overhead protection from sun and rain, ample lighting, maps and information displays, newspaper racks, trash receptacles, and telephones.

54. With the In-Town BRT alternative or even with a grade-separated elevated light rail alternative there is no other way. The hub-and-spoke concept helps to efficiently bring in transit riders from communities outside Downtown.

Response: Comment noted. It is a statement of opinion.

55. Vancouver's Skytrain vehicles are exceptionally quiet. An argument by the City's Department of Transportation show lack of knowledge or any research done on current modern technology of the latest grade-separated light rail systems which do not require any additional costs to mitigate noise control of any kind as being suggested. Also the vehicles in Vancouver's grade-separated system do not use drivers and have a perfect safety record since inception in 1966.

Response: There will be no need to mitigate noise from the In-Town BRT. The technologies being considered are inherently quiet compared to diesel buses.

56. Both technologies proposed for the In-Town BRT are not really available today. But Vancouver's Skytrain Millennium Line cost of \$762.5 million includes costs of all next generation electric cars which are built in Burnaby, British Columbia on the west coast of Canada. Also no drivers are used as they are automatically driven and under control from a primary location. Substantial savings are derived without a driver(s) for each pair of vehicles.

Response: Hybrid-electric buses are available today and will be used for the initial operations. Public did support the proposed system in 1992 and chosen as the Locally Preferred Alternative (LPA). The City Council down-voted it by a single vote. I can't understand why the public didn't vote for the choices.

Response: See response to comment #28.

58. Again I say BRT technology has evolved but applications vary but most are to complement or add to an already existing transportation system as the use of BRT in Vancouver's Skytrain grade-separated light rail system.

Response: See response to comment #28.

59. The missing alternative is a blunder and I feel the taking away of car lanes or mixing the BRT with cars will cause quicker traffic gridlock. We love our cars and unless public transit is made much faster than the bus and with many human comforts and conveniences the In-Town BRT will not be successful as some politicians and advocates are suggesting.

Response: See response to comment #29.

60. On the onset from Round 1 of Trans 2K right away I noticed no grade-separated light rail alternative. I cannot see any at-grade vehicle both the In-Town BRT or the at-grade LRT as the best choice among the alternatives. A potential blunder could be happening here.

Response: See response to comment #28.

61. Both the In-Town BRT and an In-Town grade-separated light rail system will create many jobs. Both will provide growth in, along and around the corridors. However, costs with no need for transit drivers for an elevated system can be a yearly savings which brings down the actual cost of such a system over the long term. More technical and jobs related to the rail system as computers and electronics run the vehicles. Maintenance, as shown by Vancouver's Skytrain engines, having no moving parts rarely need any work making it one of the most reliable and quietest options in the world.

Response: See response to comment #28.

62. Again the public did have a say, as shown in the DEIS of the 1992, and the alternative chosen was different and longer corridor of a grade-separated rail system which is different from the technology of today's Millennium Line in Vancouver, B.C.

Response: See response to comment #28.

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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE "KEO" MIYAMOTO  
DEPUTY DIRECTOR

TPD02-005590

November 13, 2002

Mr. Wendell Lum  
Page 11  
November 13, 2002

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

Mr. Donald Mack  
98-288 Koonohi Street  
Aiea, Hawaii 96701

Dear Mr. Mack:

Subject: Primary Corridor Transportation Project

This is in response to your testimony at the October 19, 2000 Special Transportation Committee Meeting regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. *I do not support the use of the Kam Drive-in site as a bus hub for the following reasons.*  
**Response:** The former Kamehameha Drive-in site is no longer being considered as a transit center.
2. *If (see above comment) will create more traffic in an already high traffic area and thus compromise safety.*  
**Response:** See response to comment #1.
3. *Secondly, the buses will bring more noise, exhaust, dust and dirt into our neighborhood. The buses will create a traffic hazard. The double buses will be transiting constantly throughout this hub all day and night. I might also mention that right across the street is Pearl Ridge Elementary School.*  
**Response:** See response to comment #1.
4. *Now, former Councilman Mufi Hannemann, had proposed a park on this site. He was very emphatic about that. Couple of days ago, having returned from Seattle, I read an old newspaper, Honolulu Advertiser, October 11. And I have this available for your perusal. It says here, "Oahu is badly in need of park space." This article was written by John Whalen, a former City and County director. Briefly, he said that, in terms of park land per capita, urban Honolulu falls way below the average of U.S. cities of similar size and population density for parks.*  
**Response:** See response to comment #1.

**Response:** See response to comment #1.

We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**

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JEREMY HARRIS  
Mayor

CHERYL D. SOON  
Director  
GEORGE W. TECHS AND MOTO  
PLANNING DIRECTOR  
TPD02-00591

November 13, 2002

Ms. Elizabeth Mack

Subject: Primary Corridor Transportation Project

This responds to your testimony at the October 19, 2000 Special Transportation Committee Meeting regarding the MIS/DEIS:

1. *My daughter has asthma and uses an inhaler. The City's plan to use the Kam Drive-In site as a bus hub for the City's bus system will drastically affect not only her health but elderly who live at Peenridge Square.*  
**Response:** The former Kamehameha Drive-In site is no longer being considered as a transit center.
2. *Additionally, I do not support the use of the Kam Drive-In site as a bus hub for the following reasons: Peenridge Square already has a high pollution from the freeway on the mauka, mountain side and Keonohi, Moanalua road traffic that flows from the Peenridge community. Exhaust rises up and affects our health. Buses will further pollute the area and endanger the health of children and elderly who have respiratory problems.*  
**Response:** See response to comment #1.
3. *High population density in the immediate area of Kam Drive-In are two condos directly behind it, mauka and thousands of people living on the makai and Ewa side. Buses will create unsightly view for thousands of residents that live in the neighborhood. Ultimately our property values would be diminished.*  
**Response:** See response to comment #1.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

City & County of Honolulu  
Plans to Converting the Kam Drive-Inn  
To a City Bus Turn-around

RECEIVED

Presented by: Oct 20 3 35 PM '00

Randall W. Mack, CPP, CFE  
98-099 Uao Place, Suite 2809  
Aiea, Hawaii 96701-5009

October 19, 2000

Aloha, I have lived at this address since 1989 and during the past eleven years and I have seen the economy and crime rate go up and down. Currently, Hawaii's crime rate is down 39% and our property values have declined the same amount. The condo that we paid \$225,000 in 1989 is now worth approximately \$137,000, a 39% decline.

If this project will help sustain or increase the property values then I support your actions. If this project is going to decrease property values and/or increase crime or the risk, then I oppose this project.

I believe that providing on/off-ramps from Kaonoli Street onto H-1 will make it easier for residence to commute to/from work. This should make it more desirable and more people will want to live here, thus increasing the demand and increasing the property values. The increased traffic and noise will have a negative effect and may decrease property values.

The on/off ramps will also make it easier for shoppers to reach the Pearl Ridge Shopping Mall, which should increase business and business values, thus increasing property values; however, the traffic congestion and noise will decrease property values and increase the risk to pedestrians.

Many of the residence that live here do not drive and reside at the Lele Pono because of its close proximity to the shops and stores. Many are on a fixed income and can not survive a levy and/or an increase in property taxes to pay for this project. How will this project be funded?

The community needs more information before the residence can make an intelligent decision whether to support or oppose your project.

I will support this project if it increases the value of my property and I will oppose this project if it increases crime or jeopardizes my safety or the safety of the children and people who live here. Thank you for your time.

Respectfully,

Randall W. Mack, CPP, CFE

Cc: file

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November 13, 2002

TPD02-00592

Mr. Randall W. Mack  
Page 2  
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OMPO and the City Council, and presentations before neighborhood boards and other groups to make sure that the public had adequate information to make an intelligent decision whether to support or oppose the project.

5. *I will support this project if it increases the value of my property and I will oppose this project if it increases crime or jeopardizes my safety or the safety of the children and people who live here.*

**Response:** Comment noted.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Dear Mr. Mack:

**Subject:** Primary Corridor Transportation Project

This is in response to your October 19, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. *I believe that providing on/off-ramps from Kaonohi Street onto H-1 will make it easier for residents to commute to/from work. This should make it more desirable and more people will want to live here, thus increasing the demand and increasing the property values. The increased traffic and noise will have a negative effect and may decrease property values.*

**Response:** Proposed on/off-ramps from Kaonohi Street onto H-1 have been eliminated from consideration. The new BRT-exclusive ramp proposed would be located near Aloha Stadium at Luapela Drive in close proximity to the Aloha Stadium's Overflow Lot that has been identified as a potential park-and-ride/transit center site.

2. *The on/off ramps will also make it easier for shoppers to reach the Pearl Ridge Shopping Mall, which should increase business and business values, thus increasing property values; however, the traffic congestion and noise will decrease property values and increase the risk to pedestrians.*

**Response:** See response to comment #1.

3. *Many of the residents that live here do not drive and reside at the Lele Pono because of its close proximity to the shops and stores. Many are on a fixed income and cannot survive a levy and/or an increase in property taxes to pay for this project. How will this project be funded?*

**Response:** This project has been developed following City Council policy to not increase taxes. The financial analysis (Chapter 6 of the FEIS) shows that no increases in existing taxes or new taxes will be required to fund the project as proposed.

4. *The community needs more information before residents can make an intelligent decision whether to support or oppose your project.*

**Response:** In addition to the MIS/DEIS, SDEIS and FEIS there have been substantial on-going efforts to inform the public about the primary corridor project and its impacts. These have included numerous public outreach meetings, seven progress newsletters, public hearings before

Sincerely,

CHERYL D. SOON  
Director

OCT -4 2000

FROM: Lee Manfredi  
4134-1 Keanu Street  
Honolulu, HI 96816  
Tel/fax: (808) 735-8466

TO: Council member Duke Bainum  
Chair, Committee on Transportation  
City Council  
City and County of Honolulu  
Honolulu, HI 96813-3065  
Tel: (808) 547-7004 Fax: (808) 523-4220

Dear Council Member Bainum,

October 4, 2000

I'm sorry but I cannot attend the presentation at the Hawaii Convention Center on October 5, 2000 because of a prior commitment but I would like to submit a testimony. I have read, in parts, the nearly 400 pages of the Major Investment Study/Draft Environmental Impact Statement: Primary Corridor Transportation Project, prepared by the U.S. Department of Transportation, Federal Transit Administration and the City and County of Honolulu, Department of Transportation Services, dated August, 2000. I will not address the environmental effect of this project but only the practicality and economic benefits of such a project for the populace of Honolulu.

On a personal level, the morning drive from Waialae-Kahala to Punahou School in Makiki, which should only take 7 minutes on any given day at any other time than rush hours, takes us 35 minutes. The highways and arterial roads are clogged with automobiles competing with SUVs, bumper to bumper, the entire length of the H-1. This happens all year round, year after year and getting worse. People in Hawaii have an out dated attitude about what a mass transit system is all about so they continue to join in the morning madness mindlessly; it's a habit they have become accustomed to.

The proposal for the Bus Rapid Transit (BRT) is long overdue. It is an excellent response and alternative to the congested roads and highways of this city. I have read many of the complaints against the system, i.e., it will take up parking spaces, noise, etc. but these same people also complained about the H-3 until it was completed and made the commute over to the Windward side a

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breeze. I have also traveled extensively and taken advantage of any and all mass transit systems in cities around the world; i.e., Hong Kong; Sydney, Australia; Auckland, New Zealand; Quebec, Canada; Paris, France; London, England; Chicago, Illinois; Seattle, Washington; and New York

In many, if not, most, of these cities the mass transit system had become the primary mode of transportation for its populace; the car was a secondary and a luxury. In those cities, the highway use tax, fuel tax, garage parking fees, and parking meter fees were so high that it made it undesirable to drive a car into the city. Eventually, people became accustomed to taking the mass transit system. Two car (or multi-car, here) families are unheard of in these cities. Many families did not own any automobiles at all; regardless of income bracket. The automobile became an economic encumbrance for them.

The BRT will provide service to areas as far away as Kapolei, connecting to Kalihi, downtown, Waikiki and the UH Manoa. The system will transport a greater capacity of people utilizing significantly less space on the roads and highways. Less automobiles in the city centers results in less demand for parking spaces. Utilizing electrical vehicles will result in significantly less noise and air pollution than the existing noise and air pollution from the current petroleum or diesel fuel automobiles in traffic jams.

Hundreds of UH students drive to and from the campuses, one person per car. The UH parking structure and on-campus parking lots are jammed daily with cars, with long lines of waiting cars. Students do not need their own cars, fees for student parking should be raised significantly to discourage using cars to and from the campus; and to encourage the students to rely on the BRT to get to and from their classes.

As a long time resident and taxpayer of the City and County of Honolulu, I think the BRT should and will succeed to replace the existing transportation system. This new plan to network the entire city and the connective regions is superior to any that I have experienced or seen. This plan has my full support.

Sincerely yours,

*Lee Manfredi*

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
PHONE: (808) 523-4328 • FAX: (808) 523-4720 • INTERNET: www.ci.honolulu.hi.us



CHERYL D. SOON  
DIRECTOR  
GEORGE XEONG MITALAKOTO  
DEPUTY DIRECTOR

TPD02-00593

November 13, 2002

JEREMY HARRIS  
MAYOR

Mr. Lee Manfredi  
Page 2  
November 13, 2002

**Response:** The air quality and noise analyses results concur with this statement.  
6. *Hundreds of UH students drive to and from the campuses, one person per car. The UH parking structure and on-campus parking lots are jammed daily with cars, with long lines of waiting cars. Students do not need their own cars, fees for student parking should be raised significantly to discourage using cars to and from the campus; and to encourage the students to rely on the BRT to get to and from their classes.*

**Response:** Comment noted; however, DTS does not manage parking at the University of Hawaii at Manoa.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,  
  
CHERYL D. SOON  
Director

Mr. Lee Manfredi  
4134-1 Keanu Street  
Honolulu, Hawaii 96816

Dear Mr. Manfredi:

**Subject:** Primary Corridor Transportation Project

This is in response to your October 4, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. *The proposal for the Bus Rapid Transit (BRT) is long overdue. It is an excellent response and alternative to the congested roads and highways of this city.*

**Response:** Thank you for supporting the project.

2. *The BRT will provide service to areas as far away as Kapelele, connecting to Kailhi, downtown, Waikiki and the UH Manoa.*

**Response:** The project will provide these connections.

3. *The system will transport a greater capacity of people utilizing significantly less space on the roads and highways.*

**Response:** The proposed project will provide greater capacity vehicles and give drivers an option to the automobile.

4. *Less automobiles in the city centers results in less demand for parking spaces.*

**Response:** Comment noted. We concur.

5. *Utilizing electrical vehicles will result in significantly less noise and air pollution than the existing noise and air pollution from the current petroleum or diesel fuel automobiles in traffic jams.*

### BUS/RAPID TRANSIT

Development of the In-Town BRT system between 2002 and 2005. Transit stops, transit centers, and the transitway would be developed together to achieve a completely functional In-Town BRT system by 2005. (p. 2-40)

#### Sense of "Permanence"

The major transit investment should not only be compatible with, but reinforce, the City's growth shaping goals. To achieve this, the transit system should be seen as a permanent, form-giving component of the mobility system that serves the Urban Core.

For the transit system to achieve a sense of permanence, it should have formal transit stops, be fixed in a permanent alignment, and be designed to be compatible with the varied communities through which it passes. If designed properly, a transit system that would use either steel-wheeled or electric-powered rubber-tired vehicles could achieve this objective.

#### Power Source

Both the LRT and BRT technologies recommended for the In-Town system would be powered by electric motors... the recommended wayside power distribution system would be a relatively new in-street buried electric power distribution and collection technology referred to as "embedded plate". Embedded plate technology could also be used for BRT vehicles. Hybrid diesel/electric buses do not require a wayside power delivery system, since the power is generated on-board.

#### Separation from Traffic

...to the maximum extent possible, (BRT) should be separated from adjacent lanes by curbs.

#### Boarding

...With floor heights as low as 11 inches to approximately 24 inches, these vehicles would use stations with low platforms, and still provide level passenger loading without steps.

#### System Expansion

If in the future (beyond 2005) the additional capacity is needed... to require multiple units, this capability can be achieved by entraining LRT vehicles, whereas BRT vehicles cannot be entrained.

#### Capital Cost Difference

Embedded trackwork for an LRT system is estimated to cost substantially more per mile to supply and install than the high-capacity, high-quality paving needed for the BRT transitway (in the range of \$8-12 million more per mile). Over approximately 11.8 miles, the cost differential would be \$94-142 million. (Note: Power Source, states that both LRT and BRT can be powered by new embedded plate technology.) (pp. 2-54,55, 56)

#### Note: The DEIS is deficient

SMA and Zoning Maps absent for Waikiki area (Figures 3.1-5 A-E)

Transit Center and Transit Station locations and descriptions absent (area covered, structural size and character, combined uses, access impact on surrounding community/communities, etc.) (Figures 3.1-6 A-D and 5.15)

Although Kapiolani Park was placed on the Register of Historic Places in 1992, it is neither listed nor mapped as a Historic Resource in the DEIS (Kapiolani Park Trust Lands include the Honolulu Zoo and portions of Kapiolani Avenue and Jefferson School). (Figure 3.10-1A and Tables 3.10-1 and 5.10-1) However, Kapiolani Park is mapped and listed as an adjacent Parkland Resource in the DEIS (Table 3.11-1 and Figure 3.11-1C).

#### Travel and Demographics

Note: Statistics are based on the 1990 Census

Protected high Ridership numbers to qualify for federal funding are derived from Island-Wide demographic totals not specific to Proposed Route

(pp. 3-43 to 3-50 and 4-4)

#### Highway Impacts

... Physical and aesthetic constraints make roadway widening within the primary transportation corridor very difficult and expensive, particularly within the Urban Core of Honolulu from Middle Street to Waialae-Kahala. Given the difficulty of adding lanes, future transportation improvements within the Urban Core are principally focused on transporting more people within the same roadway space as provided today.

The primary transportation corridor has two segments, the H-1 freeway segment, and the In-Town segment. ... lengthening and expanding hours of operation along with transit centers and express ramps for direct connection to the zipper lane.

... use of the existing Koko Head-bound shoulder lane would provide added capacity where it is needed most.

Improvements within the In-Town urban core with the TSM and BRT Alternatives focus on converting general-purpose traffic lanes to semi-exclusive and exclusive transit lanes. ... alternative to the automobile for mobility within the Urban Core.

**Person Throughput**

... reallocating roadway lanes from general-purpose use to transit or ride-share use. The BRT Alternative would provide significant gains in person carrying ability within the Urban Core due to its higher level of transit service than the other alternatives.

This analysis was conducted assuming an In-Town BRT articulated vehicle with a capacity for up to 120 persons per vehicle. By using even higher capacity vehicles (bi-articulated vehicles) or by further increasing the frequency of the BRT service, persons carrying capacity could be increased even more, without the need for additional roadway construction within the transportation corridor.

(p. 4-10)

**Regional Roadway Mobility**

The zipper lane system is an integral part of the regional BRT component of the BRT Alternative. It allows regional BRT vehicles to bypass much of the congestion that is present in the general purpose lanes on H-1 Freeway today and projected to be much worse in the future.

(p. 4-11)

**Summary of Travel Benefits within the Urban Core**

... TSM and BRT Alternatives would result in somewhat reduced LOS for auto traffic within the Urban Core. ... given public opposition to major roadway widenings and grade separations, these have been kept to a minimum.

The BRT Alternative offers the ability to accommodate even further increases in travel demand, without major road reconstruction. This could be achieved by using higher capacity BRT vehicles or further increasing the frequency of transit service. (Note: also a possibility of converting to new-technology embedded plate, entrained LRT referenced above)

**Sensitivity Analysis**

When planning efforts for the DEIS had begun, initial transportation analyses were based on the 2025 population and employment forecasts for Oahu from a January 1999 draft report by DBEDT.

DBEDT recently revised their 2025 population and employment forecasts... a reduction of about 5%. Despite the revised DBEDT forecast... the net effect on vehicle trips and transit trips would be at most a two percent change. It was therefore deemed unnecessary to re-do the analyses because the change in the forecast was deemed not significant enough to alter the analyses and conclusions in this document substantially.

(p. 4-19)

**BRT Route and Parking Impacts**

... About 48 unmarked spaces on the makai side of Kapiolani Boulevard between McCully Street and University Avenue would be affected. ... University Avenue (56 unrestricted and 22 restricted).

... Saratoga Road (5 marked spaces), and Kapahulu Avenue (12 marked spaces).

The University Branch of the In-Town BRT could affect roughly 8 off-street parking spaces associated with Club Rock Za near the mauka-Ewa corner of Kapiolani Boulevard and Kalakaua Avenue. ... The discussion on displacements in Section 5.2 also deals with related parking impacts.

(p. 4-22)

In Waikiki, about 1609 meters (5,280 feet) of loading zone would be affected, mostly on Kalakaua and Kuhio Avenues. The In-Town BRT would operate in a semi-exclusive mode in the makai curbside lane of Kalakaua Avenue. As a result, commercial passenger and baggage loading would be restricted to side streets and loading bay areas only. ...

On Kuhio Avenue, BRT vehicles would operate in an exclusive lane mode, mostly in the second lane from the mauka curb. ... In these segments, the BRT system would be configured to operate in the median to allow for loading in those areas fronting the three hotels. The loading zones on the makai side of Kuhio Avenue would not be affected.

(p. 4-24)

In Waikiki, the transitway would follow a curbside alignment on Kalia Road, Saratoga Road, Kalakaua Avenue, Kapahulu Avenue and Kuhio Avenue. ...

On Kalakaua and Kapahulu Avenues, the single Koko Head-bound transitway would run along the makai and Koko Head curbs, respectively. These lanes would be closed to



general-purpose vehicles. ...

On Kuhio Avenue, ... in the Ewa-bound direction, a 4.3 meter (14 feet) wide curbside lane would be provided (to include bicycles)... The wider lane would be an improvement to existing conditions.

To improve or maintain the level of bicycle transportation in the study area, the following bicycle enhancement projects would be provided under the BRT Alternative:

- Bike lane on Kalakaua Avenue between Saratoga Road and Kapahulu Avenue;
- Bike lane on Kapahulu Avenue between Kalakaua Avenue and Kuhio Avenue;
- Widen the west (Ewa)-bound curbside lane on Kuhio Avenue between Kapahulu Avenue and Kalaimoku Street.

(p. 4-27, 28)

Special Event Impacts

None of the alternatives would affect parades and large events, such as Hoolaulea, that are held on Ala Moana Boulevard and/or Kalakaua Avenue, even the BRT could be rerouted during parades, just as the bus routes along these streets are rerouted during parades today. The embedded-plate technology would require the substitution of buses for the BRT vehicles along that branch or branch segment during parades and special events.

(p. 4-29)

Land Use

Among the findings and recommendations of the land use panel was the conclusion that without a major investment in a permanent fixed transit system, the desired growth pattern in the PUC would very likely not happen. The land use panel viewed the PUC as being "ripe" for development and redevelopment when the economy rebounds. The panel agreed that appropriate implementation and redevelopment tools need to be established that favor development in the PUC, and discourage or prohibit development where it is not desired.

It was concluded by the land use panel that many of the ingredients are in place in Honolulu to implement a transit system that could be influential in accomplishing the City's stated land use goals. This conclusion was conditioned upon a comprehensive transit/land use implementation strategy developed and managed by a strong land development implementation body.

The land use panel pointed out that an important feature in attracting development along a transit corridor is the availability of already assembled tracts of land. According to... Transit Villages in the 21st Century, 1997...

(p. 5-6)

Displacements and Relocations of Existing Land Uses

Displacements would occur in the following cases:

at certain proposed transit stops, transit centers, and maintenance facilities where the space requirement of the transit feature could not be accommodated within the existing roadway or sidewalk right-of-way, and

along proposed transit alignments where the existing roadway right-of-way would not be adequate for proposed project elements (e.g. widening of Kapiolani Boulevard at Kalakaua Avenue).

(p. 5-25)

Visual Impacts

... The In-Town BRT stops in the Chinatown Special District, and in the Hawaii Capitol Special District would not have canopies or other elements which would impact views of any important landmarks. The transit stop planned in front of the Duke Kahanamoku Statue on Kalakaua Avenue, also would not have a canopy.

Other sensitive areas include the following:

- Waikiki Special District
- Ala Moana Park (and Kapiolani Park)
- Kalia Road in Fort DeRussy
- along Kalakaua Avenue
- (Note: Kapiolani Park and along Kapahulu Avenue were omitted)

(p. 5-40)

Historic and Archaeological Resources

Because of potential federal participation, this project is required to be in compliance with Section 106 of the National Historic Preservation Act. In accordance with Section 106, the "effect" of the project on historic or archaeological resources must be determined by the federal agency proposing or regulating the project.

SHPD staff has indicated the possibility of an "adverse effect" on unknown archaeological sites. If an "adverse effect" were determined, an MOA would be prepared and would specify possible survey and/or monitoring procedures. The decision as to whether the project would have an "adverse effect" on unknown archaeological sites would be made when more detailed information is generated on the preferred alternative.

Construction of the BRT Alternative could uncover archaeological resources during construction of a Middle Street maintenance facility and the widening of Kaiala Road in the Fort DeRussy area for the In-Town BRT system, because of previous archaeological finds in these areas.

(Note: The archaeological resources, Iwi Kupuna, uncovered along Kalakaua Avenue in the vicinity of Kapiolani Park Beach, Kuhio Beach, and Kapiolani Park are ignored in the DEIS.)

As earlier stated, if evidence of archaeological remains or sites are uncovered during construction of the BRT, TSM or No-Build Alternative, work would halt and the SHPD would be contacted immediately to coordinate special handling or investigative procedures. (p. 5-65, 66)

Parklands and Section 4(f) Evaluation

This section discusses potential impacts to parks and recreational resources in the project area. None of the alternatives would change the character, function or use of any park or recreational resource in the study area, despite that the two build alternatives would use the Aloha Stadium overflow parking lot as a park-and-ride lot. This use of park property would trigger the provisions of Section 4(f) of the U.S. Department of Transportation Act. The TSM and BRT Alternatives would enhance transit access to parks and recreational resources in the project area by improving the level of transit service to parks along the alignments of these alternatives.

Vehicular access to Ala Moana Park would be adversely affected under the BRT alternative because of the conversion of two general-purpose lanes to transit lanes on both Ala Moana and Kapiolani Boulevards.

(Note: The DEIS again ignores Kapiolani Park.)

Section 4(f) evaluation... permits the use of land for a transportation project from a significant publicly-owned public park, recreation area, wildlife and waterfowl refuge, or a historic site only when it has been determined that there is no feasible and prudent alternative to such use. The purpose of Section 4(f) is to limit the circumstances under which such said land can be "used" for transportation projects. The word "use" in this case means:

land is permanently incorporated into a transportation facility

there is a temporary occupancy of land that is adverse in terms of preservation of the resource, or

the project's proximity to the site substantially impairs those functions that qualify the site as a Section 4(f) resource even though no land is permanently

or temporarily acquired... called "constructive use."

The avoidance of Section 4(f) resources was an important consideration in developing and screening the alternatives. None of the alternatives would use or take a historic site. Although elements of the BRT Alternative would traverse historic districts, no buildings important to the integrity of these districts should be used.

Of the many existing and planned public parks and recreational resources in the project area identified in Section 3.1.1, only one would be affected by the alternatives such that a Section 4(f) Evaluation is required. ...

(Note: The DEIS again ignores Kapiolani Park.)

(p. 5-69, 70)

Historic Resources and Archaeology

Depending on which alternative is selected as the Locally Preferred Alternative (LPA), there could be an "adverse effect" on historic resources. A complete discussion of the impacts of each alternative on historic resources is provided in Section 5.10. Should there be an "adverse effect," a Memorandum of Agreement (MOA) under Section 106 of the National Historic Preservation Act would be executed. The MOA would stipulate detailed construction-phase mitigation procedures applicable to the specific resource adversely affected. The terms of the MOA would be strictly followed.

With respect to archaeological resources, most of the project would occur in areas that are already heavily urbanized and industrialized. In addition, most of the project requires little excavation. An archaeological contingency procedure would be developed in the unlikely event that unanticipated resources are encountered during construction. The SHPO would be notified immediately if any bones, artifacts or other signs of historic occupation are observed (refer to Sec. 5.10).

Historic buildings and structures are protected under State law...

(p. 5-80 and 82)

Parklands

Parklands are publicly owned. Subsequent developments would not encroach on parks. Impacts on parklands would be assessed during the environmental review process for each subsequent development.

(Note: Again, the DEIS again ignores the Kapiolani Park Trust.)

(p. 5-82)

**TSM Alternative**

Air pollution emissions... would increase about 20%.

Impacts to the neighbors, historic resources, water resources, and parklands would be similar to those under the No-Build Alternative. These impacts would be associated with the construction of transportation projects expected over the next three years.

Business displacements could be completely avoided under the TSM Alternative. ... Under the TSM Alternative, approximately 326 on-street parking spaces that are currently available during both peak and off-peak hours would be eliminated on Haonohi, Hing, and Beretania Streets. The bulk of the impact would occur in the in-town area along King Street between Middle Street and Waialae Avenue (269 spaces) ... McCully Street to Waialae Avenue 72 spaces.

Under the TSM Alternative, buses would operate on Kihilo Avenue in Waikiki in semi-exclusive lanes, affecting both mauka and makai curbside loading zones. The total impact is the equivalent of 48 loading zones.

The additional federal construction funds associated with the TSM alternative would translate into 947 new jobs created directly and indirectly during project construction.

(pp. 7-9, 10)

**BRT Alternative**

Through the use of electric bus technology, the BRT Alternative would reduce air and noise emissions ... regional air emissions would be less. ... would generally be quieter than conventional diesel buses. However, as with the TSM Alternative, the Regional BRT system would create a noise impact along a section of H-1 that would require noise mitigation.

... Transit center impacts will be separately analyzed in a subsequent phase since there are multiple alternative sites for each location. Under a worst case condition, the BRT Alternative could potentially displace up to 12 businesses. Up to two partial displacements are also possible.

(Note: This segmentation of the cumulative project violates State law.)

The additional federal construction funds associated with the TSM alternative would translate into 3,080 person years of jobs created directly and indirectly during project construction.

(Note: What is the differential factor describing "new jobs", above, vs. "person years of jobs"?)

(p. 7-10)

**Cost-Effectiveness Analysis**

...the lower cost per new rider represents the more cost-effective alternative. ... the cost per new rider for the TSM Alternative is \$9.74, which is greater than the cost per new rider for the BRT Alternative of \$7.67 ...

(Note: As determined by an assumption of a full 120 passengers per BRT vehicle and based on 1990 island-wide population data?)

(p. 7-11)

**Environmental/Socioeconomic Equity and Benefit**

... The BRT Alternative would increase daily transit trips by 16.2 percent over the No-Build Alternative. The BRT Alternative is projected to produce a 12.3 percent increase in daily transit trips over the TSM Alternative.

(p. 7-12)

**TSM Alternative**

... this alternative would not go far in developing attractive alternatives to the private automobile, or in enhancing desired land use development patterns or in supporting the implementation of 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 PUC, and in mobility improvement within the PUC.

This alternative would limit the use of 326 parking spaces ... Air and noise emissions would increase.

The total cost over 25 years would be \$518.7 million ... annualized cost would be \$41.42 million.

(p. 7-13)

**BRT Alternative**

... It would substantially increase people-carrying capacity within the corridor and help focus growth along the alignment of the In-Town BRT system. Higher density redevelopment in a transit-supportive manner, particularly at transit centers and transit stops, would be encouraged. ... supporting implementation of an urban growth strategy that integrates land use and infrastructure planning. It would help facilitate desired land use development patterns consistent with the vision for the island.

... transit centers, transit stops, and other project elements ... conditions through cohesively designed structures, street furniture, landscaping and lighting. The quality of urban living would increase.

... Transit patrons would reap travel time savings. However, this Alternative would cause more motorist delay than the TSM Alternative, which is expected to accelerate a switch in travel behavior from automobiles to transit. It would establish an attractive, high capacity linkage between Kapaolei and the PUC. It would improve mobility within the PUC, including access to Waikiki because of the In-Town BRT System.

... Parking losses would be greater ... historical impacts would be relatively minor. ... Impacts during project construction would be substantially greater than for the TSM Alternative because of the greater scope and duration of construction, particularly building the In-Town BRT system transitway on arterial streets. The construction, however, will result in significantly more employment being generated than with the other alternatives.

The total cost over 25 years would be \$1,050.3 million... Its annualized capital cost (including vehicle replacement) would be \$82.6 million. Using FTA criteria, the BRT Alternative would be more cost-effective than the TSM Alternative in attracting new riders.

(p. 7-14)

manufacturers and they would be asked to provide the City with design data and test/demonstration results, as well as prepare written comments on the City's requirements. An Industry Review would then be undertaken. Separate meetings would be held with each participating manufacturer to review their comments on the City's requirements and discuss the City's questions. Following these meetings and site visits, a technology would be selected.

(p. 2-32)

... While the candidate technologies are in various stages of development and none are yet fully proven in revenue service, a decision on technology need not be made at this point. During the next year or so it is anticipated that both the embedded plate and hybrid diesel-electric technologies will advance to a state where they will be considered service proven. At that time, a decision on technology may be made.

The final selection of the technology for the In-Town BRT system would be based on a detailed evaluation of the technology options. The designs, and test/demonstration results of each technology would be evaluated against specific performance and functional requirements for the In-Town BRT system. These requirements would be provided to the

May 6, 2002

MAY 7 2002

Federal Transit Administration, Region IX  
U.S. Department of Transportation  
201 Mission Street, Suite 2210  
San Francisco, California 94105-1839  
Attention: Mr. Raymond Sukys, Director  
Office of Planning and Program Development  
Ms. Donna Turchie, Senior Transportation Representative

Federal Highways Administration  
Prince Jonah Kūiū Kalanianoʻle Federal Building  
300 Ala Moana Boulevard, Room 3-308  
Honolulu, Hawaii 96813  
Attention: Mr. Abraham Wong, Division Administrator  
Mr. Bruce Turner, Assistant Division Administrator

Hawaii Office of Environmental Quality Control  
State Office Tower, Suite 702  
235 South Beretania Street  
Honolulu, Hawaii 96813  
Attention: Ms. Genevieve Salmonson, Director

Department of Transportation Services  
City and County of Honolulu  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813  
Attention: Ms. Cheryl Soon, Director

22 Pages Via Facsimile Transmission

Subject: Primary Corridor Transportation Project: Bus Rapid Transit  
(BRT) Supplemental Draft Environmental Impact Statement

Dear Ms. Turchie, Mr. Wong, Ms. Salmonson, and Ms. Soon:

For the purpose of this response, you will find that the enclosed concerns, questions and comments focus primarily on the proposed In-Town portion of the Proposed BRT Plan. In addition, specific concerns continue to include, but are not limited to, the following:

- lack of correlation to pending Primary Urban Center development plan revisions;
- absence of traffic testing for cumulative traffic impacts of the proposed In-Town BRT;
- absence of information and location of impacts on two significant historic sites and landscapes;

- incomplete community participation and questionable support for specific components, facilities, and routes for the In-Town BRT Walkiki terminus;
  - public and private circulator transportation, service and delivery operations impacts;
  - infrastructure and utility impacts;
  - absence of defined and proven technology;
  - absence of cumulative capital costs, operations subsidies and debt service as projected beyond 1998 dollars;
  - absence of the defined City taxpayer burden to carry the non-federal cost of the proposed project;
  - absence of ancillary facilities descriptions, locations, linkages and impacts on surrounding communities; and
  - compromised present quality of life and "Hawaiian Sense of Place", e.g. adverse impact of dedicated/embedded rapid transit infrastructure, equipment, utilities and facilities on scenic viewplanes and landscapes.
- Further, there is a question of incomplete expansion and improvement of the present Transportation Service Management program to meet its fullest In-Town potential, including maximizing the hub-and-spoke circulator system, express vehicles, and public and private ridership incentives. Finally, it appears that the larger objective of providing mass transit to serve the greatest number of people over the longest distance in the least amount of time remains to be comprehensively addressed.

Very truly yours,

*Michelle Spalding Matson*  
Michelle Spalding Matson  
3831 Gali Street  
Honolulu, Hawaii 96815

cc: Oahu Metropolitan Planning Organization  
Honolulu City Council

RESPONSE TO THE PRIMARY CORRIDOR TRANSPORTATION PROJECT  
BUS RAPID TRANSIT (BRT) SUPPLEMENTAL DRAFT ENVIRONMENTAL  
IMPACT STATEMENT

CONCERNS, QUESTIONS and COMMENTS

Traffic and Roadway Impacts

Reduced Level of Service and Traffic Overflow

The SDEIS states that to give transit the priority necessary to make it an attractive alternative to the automobile, some lanes along the proposed In-Town BRT alignment will need to be converted from general-purpose lanes to transit only lanes, which will ultimately result in reduced number of lanes for general purpose traffic (see 2-19). The SDEIS further states that major regional roadways would still experience traffic bottlenecks in 2025, and only the BRT could provide a non-congested travel mode through key intersections in the Urban Core that still would be at or near capacity, because the In-Town BRT would be buffered from traffic delays, which would result in additional reduced level-of-service for automobile traffic within the Urban Core (see 2-19 and S-8).

Thus, the In-Town BRT becomes a major part of the problem, not the solution. Prioritization of the BRT at congested intersections would mean stopping all other traffic at the intersections it approaches, in effect compounding congestion in the urban core. This, coupled with the integration of exclusive and semi-exclusive transit lanes and median loading platforms, will for the most part preclude normal traffic from using the main arteries of Honolulu due. Therefore, because of such lane restrictions and delays, the City anticipates that motorists will be forced out of their cars onto the In-Town BRT, when in fact, motorists will choose to take alternate routes through surrounding communities and neighborhoods instead.

Indeed, the SDEIS discloses that during construction of In-Town BRT transit lanes within existing streets, a public information program will disseminate information on detours and recommended alternative routes in order to minimize public inconvenience (see S-12 and S-15). Certainly, this information will be helpful to motorists in knowing which surrounding community and neighborhood streets are most accessible.

However, the SDEIS does not address the significant impacts on the surrounding areas resulting first from cumulative construction impacts or subsequently from resituated traffic lanes and the In-Town BRT's prioritization over vehicular traffic. Further, the City has conducted no comprehensive traffic count studies for the major thoroughfares proposed to be converted to BRT corridors, and the City has ignored concerns reflected in measures brought before the City Council and

requests at public meetings to test the impacts of such lane closures on Honolulu's urban streets. How would neighborhoods surrounding BRT corridors be buffered from traffic overflow and congestion resulting from the buffered BRT and vehicular level-of-service delays? How would ensuing traffic congestion otherwise be mitigated in neighborhoods surrounding BRT corridors? Prior to seeking the funds to construct the proposed In-Town BRT, the City must determine the significant physical impact this will have on the areas, communities and neighborhoods, surrounding the In-Town BRT corridors.

By implementing a simple two-to-three-month trial period of closing off the In-Town BRT lanes proposed to be closed or limited to through traffic, and ramping up existing express and mauka/makai bus service with a mass transit publicity campaign, the effects of any ridership increase and traffic congestion impacts will become obvious. WHY HAS THE CITY ADMINISTRATION REPEATEDLY REFUSED TO IMPLEMENT THIS TRIAL PROGRAM, AND WHAT TRAFFIC IMPACTS ARE THEY HESITANT TO DISCLOSE? By avoidance of this comparatively simple and cost-effective trial measure, the City administration appears to be concealing what could become Honolulu's worst traffic nightmare - the significant negative impacts of the In-Town BRT.

Ridership

The SDEIS states that the last detailed boarding study was conducted in 1991; that in February, 2000, DBEDT revised its 2025 general population forecast for Oahu downward by 5%; that the BRT would improve the person-carrying ability within the Urban Core by an average of 11% over the no-build alternative; that such capacity would be only slightly greater than the demand; and that the demand would amount to only a 3.3% increase in work trips (see 3-11 and S-8). Thus there would be a maximum capacity increase of 7.7% for non-work trips. But these trips are not defined and the SDEIS ignores the fact that both the Urban Core resident population and visitor count have continued to decrease over the past ten years.

Indeed, the majority of Honolulu citizens will not give up their automobiles to hop on the In-Town BRT simply to go from point A to point B. Many have two or even three jobs to maintain costly living expenses in Honolulu. Many have active families that require transportation to various activities, such as after-school soccer and baseball in the year-round mild climate. Many transport bulk purchases both during and after work hours from popular warehouse stores. And many of these tasks are required to be accomplished in between the others.

In addition, would the City choose to suffocate private enterprise by attempting to displace non-subsidized private sector passenger transportation with the City subsidized In-Town BRT? Public-private partnerships can be successfully forged to eliminate, rather than create, additional transportation subsidy burdens on the

local taxpayer, thus benefiting the public interest as well as promoting the welfare of private enterprise and the local economy.

Contrary to the City's claims, the BRT will not provide an "attractive alternative" to the automobile. It will provoke a forced alternative to the automobile - one that would be as roundly opposed as the State's recent quickly-failed traffic camera citation program, which is now going to cost the State taxpayers millions of dollars to undo.

#### Infrastructure Impacts

The SDEIS states that the In-Town BRT vehicles would operate at-grade in exclusive transit lanes along major arterial streets (see Table 2-2-4). In other locations, the In-Town BRT system would operate either in semi-exclusive lanes (used by transportation carriers or vehicles making turns) or in mixed traffic. Along about 38% of its length, the In-Town BRT would run in transit lanes in the median of existing arterial roads (e.g., sections of Kapiolani and Dillingham Boulevards). Along 29% of the alignment, the system would run along the curb in semi-exclusive lanes. Semi-exclusive lanes would be shared with right-turning vehicles, and in the case of Waikiki, with other buses (public and private) and trolleys. For the remaining one-third of the alignment the BRT would operate in mixed traffic (see 2-11).

Many recent failing water mains and sewer lines have already demonstrated the serious impact of providing only one or two lanes available to through traffic. The In-Town BRT would be intensifying this impact by taking the following:

#### Downtown

Dillingham - 2 center lanes  
Iwilei - 2 lanes  
North King - 2 lanes  
Hotel - 2 lanes  
Bishop - 1 curb lane, makai  
Aloha Tower Drive - 1 curb lane, makai  
Alakea - 1 curb lane, mauka

#### Kaka'ako Makai

Nimitz - undefined  
Ala Moana - undefined  
Channal - undefined  
Ilalo - undefined  
Ward - undefined  
Auahi - undefined

#### Kaka'ako Mauka

Halekuanila - 1 lane  
South Street - 2 lanes  
Pohukaina - 2 lanes  
Auahi - 2 lanes  
Queen - 2 lanes

#### UH-Maunaloa

Richards - 1 lane  
South King - 1 lane  
Pensacola - 2 curb lanes, Ewa side  
Kapiolani - a) 2 center lanes to Atkinson  
b) transition from 2 center to 2 curb lanes in mixed traffic to Kaliakau  
c) 2 curb lanes to Isenberg  
d) transition from 2 curb to 2 center lanes in mixed traffic to University  
University - 2 exclusive center lanes to South King  
South King to UH - 1 semi-exclusive curb lane  
UH to Kapiolani - 1 exclusive center lane

#### Waikiki Loop

Ala Moana - a) 1 semi-exclusive makai curb lane to Kalila  
b) 1 exclusive mauka center lane to Hobron,  
1 semi-exclusive mauka curb lane to Kalila  
Kalia - add 2 lanes to Saratoga  
Saratoga - 2 lanes  
Kaliakau - split 1-way couplet  
Kalakaua to Kapahulu - 1 semi-exclusive makai curb lane  
Kapahulu to Kuhio - 1 semi-exclusive curb lane at Waikiki  
Terminus - Kapiolani Park Transit Stop  
Kuhio to Saratoga - 1 semi-exclusive mauka curb lane

To compound this conundrum, the City administration proposes to raid the City's Sewer Fund to balance the City's budget to ultimately fund the first \$35 million of the Waikiki-to-Downtown segment of the In-Town BRT (see Exhibit C, attached). However, if the Sewer Fund is raided for the first \$35 million this year, how will the remaining 62% work trips in automobiles (see S-8) get through the turn-up streets with the BRT consuming traffic lanes as the 100-year-old sewer lines continue to break? The traffic will not magically disappear, as the City administration would have us believe. Again, it will simply be rerouted to a greater magnitude via ripple effect into and through surrounding neighborhoods and communities.

Further, the SDEIS states that the construction implementation schedule would focus construction-phase impacts in one area at a time by geographically distributing the work at each phase of construction, with development of the In-Town BRT system between 2002 and 2006, with the initial fleet of In-Town BRT vehicles being ordered, manufactured and delivered in 2003 and 2004, and with testing and start-up occurring in 2005 (see 2-25 and 28). However, the SDEIS also states that a decision on the In-Town operating system technology "may" be made in another year, as existing technologies either do not satisfactorily meet the City's expectations and specifications or have not advanced to a state where they are considered service proven. As no decision has been made on an appropriate technology, how can capital and operating costs be projected with any reliability? In addition, the SDEIS states that construction schedules would be phased according to the availability of funds. Therefore, the construction schedule would be flexible and could be delayed according to fiscal constraints (see S-16).

In viewing the above wavering revelations en toto, it does not appear that the City has an efficient and effective plan to implement this project as stated, or to even mitigate its impacts on the Honolulu urban community. With deficiencies of such magnitude, it can be concluded that traffic solutions for Honolulu require further study for more appropriate and effective alternatives.

Notably, the SDEIS states that the BRT would be superior to the TSM alternative in terms of regional mobility, and that greater mobility would be provided by the BRT because of increases in transit and HOV use (see S-8). Thus, the question arises as to why the In-Town BRT is proposed to consume lane space in the urban core when it could be placed in more efficient use over longer distances in the regional Ewa-Downtown application, and when greater flexibility and mobility can be provided by smaller high-occupancy vehicles with a greater number of routes and more convenient stops in the urban core in lieu of fixed 130-person capacity trams on dedicated lanes in a confined area?

#### Community Impact

The In-Town BRT portends surging land re-development and higher property taxes along transit corridors, forcing small businesses out of once affordable business districts. The SDEIS is not shy about exposing this objective, as it states repeatedly that more desirable land use and development patterns in coordination with specific developers are in store for Honolulu's established urban communities. In fact, the SDEIS identifies one criterion for selection of a new transit technology as being a specific alignment to "evoke the desired land use response from land developers" (see 2-18). Thus, the SDEIS demonstrates little to no concern for the future welfare of the small businesses, patrons, and residents of the areas proposed to be impacted by the In-Town BRT transit corridors, and indeed, is ultimately writing them out of the equation in favor of

increased development and density - supporting not the community, but the In-Town BRT.

According to the SDEIS, the proposed In-Town BRT will necessitate 17 businesses to relocate, along with up to 47 partial business displacements. Fair market compensation for land, buildings, and uses would be provided to property owners directly affected by right-of-way requirements, and affected businesses would be encouraged to plan moves in advance so that relocation would occur with minimal delays and inconvenience (see S-10 and S-12). Further, land value increases generated by development rights will cause property taxes to skyrocket, and the remaining small businesses will be unable to survive in the redevelopment area. Thus, for example, the BRT corridor along Dillingham Boulevard would incite removal of small businesses, consolidation of lots, and construction of highest and best use buildings, both in value and density - serving not the community, but the developer.

The SDEIS states that where on-street parking is removed to permit BRT transit lanes, new neighborhood parking facilities would be considered to replace on-street parking, but only if they served a community purpose (see S-8). Thus, many residents in single-family dwellings along BRT transit corridors, including University Avenue, would be without adequate parking for their homes unless this becomes a larger community need. Once determined as a community need in this established residential area, one or more residential lots in a central location would be required to be taken by the City's power of eminent domain to build a multi-level parking garage in order to fulfill the public purpose of replacing the public parking that was lost to the BRT. Again, this appears to be contrary to the welfare of the established community.

Here also, the SDEIS lists another criterion that the selected transit technology must be flexible enough in order to not pre-empt parades or other activities along the alignment. Yet the proposal does nothing to ensure that the In-Town BRT does not disrupt businesses and residences as it bisects the communities and business districts it passes through every 2 to 4 minutes via dedicated transit corridors. In fact, the SDEIS aggressively proposes to remove 912 parking spaces and 725 feet of curbside loading space to provide for dedicated curbside BRT lanes (see 4-25 and 4-26).

This impact would be greatest in commercial business and Waikiki resort zones within the Urban Core, where loading areas are vital and must be accessible in order to ensure efficient and timely delivery of goods and services. However, the SDEIS fails to address established loading requirements of the private trucking and delivery industry in Waikiki and other commercial areas along the In-Town BRT corridors. Further, the SDEIS fails to address the cumulative economic impact of the In-Town BRT on surrounding businesses and resorts, and private delivery and non-subsidized passenger transportation services when one lane is removed from Bishop and Alakea Streets and Kalia, Kalia and Kapahulu



Avenues, and when two lanes are removed from Kapiolani and Dillingham Boulevards and University Avenue.

Impact to Significant Resources

The BRT SDEIS makes no mention that either Kapiolani Park or Irwin Memorial Park are listed on the Hawaii State Register of Historic Places and eligible for the National Register of Historic Places (see Table 5.10-1 on 5-45). Yet, the BRT SDEIS describes the BRT 60-foot tram running curbside to these sites. Further, Kapiolani Park is a known habitat for the white tern, listed as endangered by the State of Hawaii and a federally protected species under the Migratory Treaty Bird Act (see S-11).

There is a serious question as to why the SDEIS does not recognize and acknowledge Kapiolani Park, which is nearly 200 acres, as a significant site contiguous to the proposed In-Town BRT corridor. The SDEIS states that the In-Town BRT terminus is at an undefined transit stop on the Koko Head side of Kapiolani Avenue between Kalakaua and Kuhio Avenues (see 2-16 through 19 and 3-3 through 3-7). This places the BRT Waikiki turnaround transit stop, with attendant 8-ft. wide, 160-ft. long raised loading platform, ADA ramps and railings, and power supply sub-station upon and within the Kapiolani Park Trust lands on Kalakaua Avenue and fronting the Honolulu Zoo (see S-1, 2-12 and sheet TRM 14 dated 7-24-00, Exhibit A as attached). In addition to Kapiolani Park being listed as a Registered Historic Site, the Court has ruled that municipal facilities are not an appropriate use of Kapiolani Park Trust lands (see SP No. 89-0015, Conclusions of Law and Order, 1991).

In view of the above, the location of the proposed BRT route's attendant municipal facilities would therefore appear to be a violation of the historic trust provisions, as well as a significant negative impact on the historic landscape and viewplanes of this historic site.

While the City claims that only shelter and street furniture improvements are planned to be constructed at the Kapiolani Park terminus (see 2-18), there is additional concern that the cumulative impact of the municipal facility components of the In-Town BRT transit system will evolve into much more than a mere bus stop at this terminus. Indeed, the SDEIS states that a) certain local routes would be converted into circulators to feed the In-Town BRT system and new circulator routes would provide frequent service from the transit stop on the Koko Head side of Waikiki (see 2-5); and b) project elements such as ...transit stops... provide urban design opportunities to improve existing landscapes with cohesively designed architectural elements, landscaping, street furniture, street trees and lighting (see S-10.). Thus, Kapiolani Park is planned to be the access point from East Honolulu to the BRT system's Waikiki-to-Downtown route, and there is additional concern that the Design Opportunities the City administration has planned for the proposed BRT project could most assuredly impact the

historic landscape of Kapiolani Park as well with expanded parking and transit center amenities to service East Honolulu access to the In-Town BRT system at this Waikiki terminus (see 2-18).

Along with ignoring that the selected Waikiki transit terminus is a historic site, the SDEIS also does not address the visual impact of the 60-foot long, 15-foot-high double tram cars impacting the significant historic park, Diamond Head and shoreline viewplanes every 3 minutes, nor the structural impact of the raised and elongated loading platform and power supply station within the monkeypod trees and open space of this historic landscape along Kapiolani Avenue. From this it can be easily determined that there is much about the Waikiki/Kapiolani segment of the In-Town BRT proposal that remains to be disclosed. There are many more unanswered questions about the impact of such a plan on this historic site, including but not limited to the question of what is to become of this significant area if this East Honolulu public transportation terminus is implemented?

Further, while transit stops, centers and transfer points are shown for the In-Town BRT from Iwilei to Kamakoe, no transit stops or transfer centers are shown for Waikiki in the SDEIS. However, as with the University/King Transit Stop accessing the mauka In-Town BRT route with peak period service proposed to be generally provided every 5 to 15 minutes and off-peak service every 15 to 30 minutes (see 2-7), the Kapiolani Transit Stop at the Waikiki BRT terminus is clearly a foreseeable candidate as a transit center transfer point for bus routes from East Honolulu accessing the Waikiki-to-Downtown In-Town BRT route.

Surely these concerns and any impact disclosures prompted therefrom should be properly addressed in an additional SDEIS specific to the Waikiki segment in accordance with the established Environmental Impact Review process for proposed projects funded by public revenue sources.

As an example, the SDEIS states that the Kaka'ako Makai Branch would operate between the Iwilei Transit Center on the Ewa end and an undefined Kapiolani Stop on the Kokohead end (see S-5), and goes on to disclose that portions of the Kaka'ako Mauka and Makai branches on Richards Street have been realigned to address resident input (see S-6), as objections to using Richards Street makai of South King Street for the BRT route lead to requests for the City to explore alternate alignments (see 2-29). Further, the Director of the City Department of Transportation Services, Cheryl Soori, clearly stated at the McCully/Moili'i Neighborhood Board's regular meeting of February 7, 2002, that the planning process will have as many meetings as needed (see Neighborhood Board #8 Meeting Minutes, page 5).

However, although specific concerns were stated in responses to the BRT MIS/DEIS regarding the Kapiolani end of the proposed BRT route as described, there has been no further opportunity for resident community input regarding the impacts of the proposed In-Town BRT corridor on this area, and more specifically

Kapiolani Park. In fact, interested and affected organizations and individuals, including but not limited to the Kapiolani Park Preservation Society and the Diamond Head/Kapahu/ St. Louis Heights Neighborhood Board, have been neither directly informed of nor invited to periodic Waikiki workshops to address the Waikiki segment of the In-Town BRT route. Further, the Diamond Head/Kapahu/St. Louis Heights Neighborhood Board was informed by City Councilmember Bainum at their April 11, 2002, regular meeting that there would be no SDEIS published on the In-Town BRT lane relocations, commercial loading zone changes, or any other changes to the Waikiki/Kapahu portion of the proposal.

Therefore, desired community input on the potential significant impacts of the In-Town BRT on the Kapahu area has been virtually precluded. Had the few Waikiki workshops occurred openly and informatively, the concern about the potential significant impact on one of area's most prominent historic sites along the proposed In-Town BRT route, Kapiolani Park, could have been brought forth.

#### Visual Impact to Viewplanes

The SDEIS states that priority treatment for buses would involve minimal physical change, resulting in little or no visual impact to the existing landscape, regardless of land use (see S-10). However, the SDEIS does not address the visual and viewplane impact on the traditional Hawaiian Sense of Place for residents and visitors alike experiencing the 51 futuristic, 60-foot-long double tram cars, 15 feet in height, as they stop in front of historic Iolani Palace, cut along the significant Waikiki ocean shoreline viewplane, and intrude on historic Kapiolani Park landscape and significant Diamond Head resource viewplanes every 3 minutes.

In addition, a tree survey and impact analysis for the In-Town BRT identified 144 trees that would be impacted by the project, of which 36 trees are classified as "notable", i.e., important to the urban landscape character, either individually or grouped to comprise a recognized and important element of the visual landscape (see S-11). According to the SDEIS, a certified arborist determined that 25 trees were too old or otherwise unsuitable for successful transplantation, and these trees would be replaced elsewhere with City stock trees. Further, removing and relocating ten (10) "notable" mature monkeypod trees from Kapiolani Boulevard (see S-14) would unquestionably have a grave effect and significant impact on the visual character and integrity of this area.

#### Financial Planning Deficiencies

##### Assumptions

The SDEIS states that a financial plan analysis, conducted by consultants hired by the City administration, assessed the City's ability to operate and maintain the proposed transportation network, and financial plans were

developed based on two key assumptions among others: 1) that the full scope of each alternative must be completed without raising taxes, and 2) that the City's high bond rating must not be affected. The SDEIS further states that funding would be sought from multiple federal and local sources, and that City general obligation bonds would be used to fund up to 47% of the cost of the project and additional general obligation bonds would be issued to fund early construction activities in anticipation of later federal or State reimbursement (see S-15, 16 and 18).

However, the above assumptions did not factor in the fact that the State has now declined to assist with the financing of the proposed project. This would appear to place an undue burdensome risk on the City's taxpayers and have the potential to jeopardize the City's bond rating.

The SDEIS defines the local funding for this \$1 billion project as \$285.9 million in general obligation bonds with interest and principal debt service paid by the local taxpayer, and the City highway fund for \$35.7 million, with the remainder of the \$904 Million - \$422.3 Million and \$160 Million - coming from Federal Transit Administration and Federal Highway Funds, respectively. For FY 2002 to 2010, the average total annual impact on the City taxpayer general fund (89%) and highway fund (11%) required for capital cost and operating cost subsidy would be: \$107.8 Million for the regional BRT system (see S-18).

The SDEIS further states that based on the above assumptions, major existing revenue sources were examined and costs were then compared to the revenue projected to be available from these sources over the nine-year period of FY 2002 to FY 2010, the period within which all of the capital improvements except vehicle replacements would be implemented. However, this could be somewhat misleading, as the SDEIS states that construction schedules would be phased according to the availability of funds and would be flexibly adjusted according to fiscal considerations (see S-16). Therefore, considering the question of availability of funds and the phasing of flexible construction schedules this may mean that in view of the State withdrawing from the project, construction may be delayed indefinitely or discontinued permanently with any shortage of local funds.

#### Costs in 1998 Dollars

Further, because the SDEIS addresses the cost of the proposed project in terms of 1998 dollars, the SDEIS appears to be highly misleading and without regard for the total debt cost and capital expense outlay over the implementation phase of the proposed project.

The SDEIS states that capital costs for the regional BRT from Kapiolani to Kapahu would cost \$904 million over nine years from FY 2002 to FY 2010, and that construction of the In-Town BRT transit lanes and acquisition of a fleet

of 51 high capacity electric vehicles would cost \$345.5 million with the balance of the capital costs to expand existing maintenance facilities and increase the transit fleet to 730 buses. The SDEIS further states that the capital costs for the In-Town BRT would be \$388.2 million from FY 2002 to FY 2025 (see S-17 and S-6).

However, Table 2.3-1 on 2-26 of the SDEIS lists a different set of numbers - \$355.64 million for the In-Town BRT with a total cost of \$999.5 million, and notes this increase includes \$32.8 million for the addition of the Kaka'ako Makai branch and the Pensacola St. realignment, \$8.3 million for 13 additional In-Town BRT vehicles, and \$14.5 million for BRT alternative refinements.

In any event, the question remains centered on the mixed juggling of the numbers and whether these costs are limited to capital costs only, while annual inflation factors from the 1998 level through 2025 and debt service, including City taxpayer repayment of principal and interest, should be more properly disclosed as well.

#### Local Taxpayer Cost - A Quality of Life Impact

The non-federal capital cost of the proposed BRT project is to be financed through City taxpayer-reimbursed General Obligation bonds. The SDEIS states: "BRT would result in over 18% WORK TRIPS on transit... and 14.7% with no-build" (see S-8). This is only a 3.3% increase in work trips at a cost of nearly \$1 Billion in 1998 dollars, not including debt service.

Further, the operations and maintenance cost is projected at a whopping 71% to be subsidized by City taxpayers to supplement collected fares (see 6-1). According to the SDEIS, operations and maintenance subsidies for the regional BRT in 1998 dollars would be \$133 million in FY 2025, and the total estimated operating cost for the regional BRT system would be \$188.4 million in FY 2010 (see S-6, 17 and 18). Thus, all but at least \$55.4 million of the operations and maintenance costs of the regional BRT system will be subsidized by the Honolulu taxpayer in FY 2025 - a 71% subsidy to increase work trips only 3.3%. Yet, Councilmember Bainum's Resolution adopted by the City Council last year places a 33% ceiling on any transit subsidy (see Exhibit B, attached).

Together, as formulated in the SDEIS, this is going to cost the City taxpayers annually \$83 million in capital costs and \$133 million in operations subsidy, with In-Town fares only covering 4% of the additional operations cost. This capital and operations cost totals \$216 million City taxpayer dollars paid annually as of 2010, with undefined debt service and inflation costs.

The SDEIS defines the local funding for this \$1 billion project as \$285.9 million in general obligation bonds with interest and principal debt service paid by the local taxpayer, and the City Highway fund for \$35.7 million, with the remainder of the

\$904 million capital investment (in 1998 dollars) - \$422.3 million and \$160 million - coming from Federal Transit Administration and Federal Highway Funds, respectively (see S-18). Here the City anticipates a 64% : 36% funding ratio for funding from federal and local sources, respectively. However, federal funding practices indicate that high-end transportation projects in the \$1 billion range, such as that proposed for Honolulu, would only be funded at a 50% : 50% matching fund ratio, as the more costly the project, the less federal funding match awarded. Further, according to national experts in this area, this would be allocated at only \$100 million annually for five years to help ensure accountability.

Moreover, current indications are that the Congressional re-authorization dollar amount is going to be controversial this year in a battle of how much will be inserted in the transportation bill. In addition, the Federal Transportation Administration has confirmed that the State has withdrawn support of the Honolulu BRT project proposal and is no longer part of the BRT financing equation.

Yet, the City administration "anticipates" federal and state funding reimbursement "later", and the City administration "assumes" that the \$1 billion-plus transportation project will be completed without raising taxes, and that the City's bond rating will not be affected (see S-16 and S-18).

Does the City and County of Honolulu have the financial capacity to afford this? Under the City's current fragile financial condition it would appear that this would place an unduly burdensome weight on Honolulu City taxpayers, as well as negatively affect the City's current bond rating to the point where such rating agencies as Moody's, Standard & Poor's, and Fitch's could downgrade City bonds to junk-bond rating, causing financing costs to soar even higher for City taxpayers. Rather than paying down the debt load, the present City administration advocates restructuring the City's debt load by creating more debt to pay off existing debt, spinning the City taxpayers, those ultimately responsible for satisfying both principal and interest paid on capital improvement general obligation bonds, into an ever deeper fiscal black hole. Therefore, the In-Town portion of the proposed BRT system, with all its inherent problems and impacts on the urban core, will be much, much more than a bad investment for City taxpayers - it will become an unwieldy fiscal burden on the citizens of Honolulu.

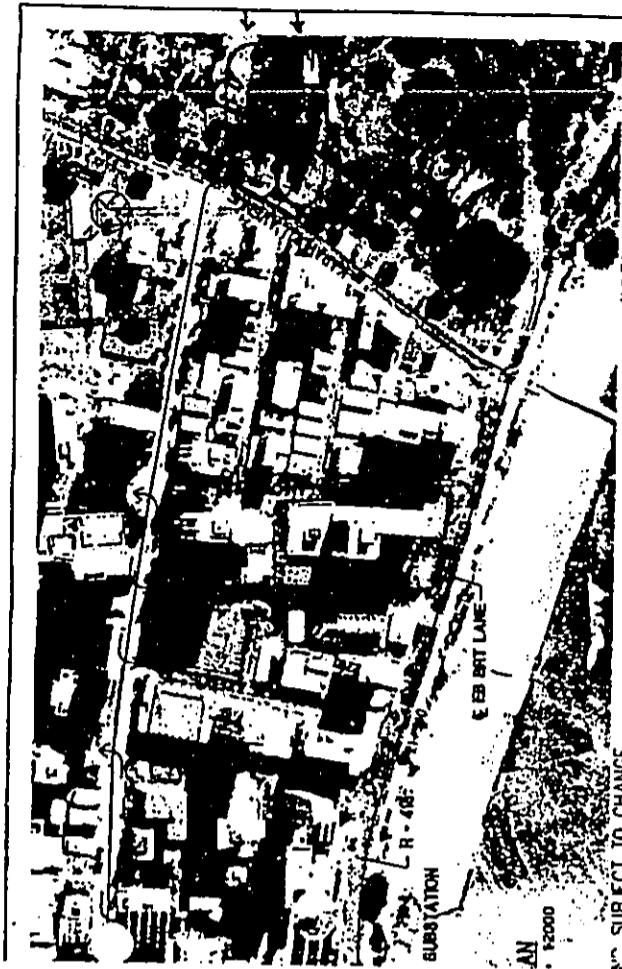
#### Conclusion

The proposed In-Town BRT is a very restrictive undertaking. It restricts the free flow of traffic. It restricts the free enterprise of private carriers by live-aliening their livelihood. It restricts open discussion of reasonable alternatives for REAL traffic congestion solutions. And last, but certainly not least, it restricts

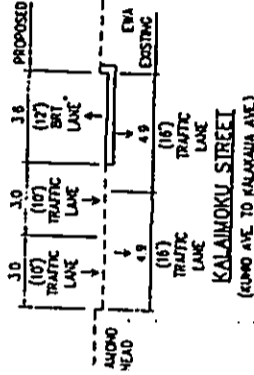
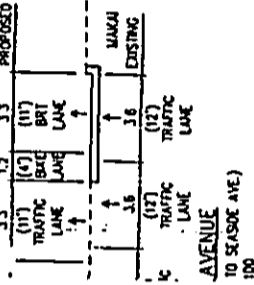
advancement of the quality of life in our urban area by overburdening the City taxpayers with unwieldy capital and operations costs.

What does the In-Town BRT really mean? It means compounded congestion on main thoroughfares by 60-foot trams every 2 to 4 minutes that eat up traffic lanes. In spite of the City administration's claims, this will not get cars off the road. It will cause cars to circumnavigate the main traffic thoroughfares into surrounding communities and neighborhoods, increasing congestion, noise and pollution in residential areas. The construction jobs are temporary - but the impact on our streets, in our neighborhoods, and on our livelihoods will be here to stay for several generations if the In-Town BRT is allowed to roll forward.

The In-Town BRT is the wrong system for Honolulu's contained urban area. The solution to Oahu's urban traffic gridlock is over the longest distance to serve the greatest number of people in the least amount of time. This transportation proposal should be focusing instead solely upon addressing Oahu's transportation needs between Kapolei, the "Secondary Urban Center," and Honolulu's urban core (see S-3). Ironically, what is most practical and less costly for the higher density In-Town Honolulu Urban Core surrounded by smaller mountain, valley and shoreline communities and business districts, is a combination of far more accessible, flexible and convenient public and private circulator and express routes - that which was rejected by the City administration in favor of the In-Town BRT.



SUBJECT TO CHANGE



NOTE: ALL DIMENSIONS ARE IN METERS UNLESS NOTED OTHERWISE

12. = 50 0 50 100  
 FULL SIZE SCALE: 1:2000  
 12. = 2.5 0 2.5 5  
 FULL SIZE SCALE: 1:100

DRAWING NO.

IN-TOWN BRT  
 PLAN AND TYPICAL SECTIONS  
 WAI STA. 20+500 TO WAI STA. 22+100

TRM-14

DATE: 7-21-00 SHEET NO.

RESOLUTION

EXHIBIT B

ESTABLISHING A POLICY ON FUNDING THE OPERATING COST OF THE CITY BUS SYSTEM.

WHEREAS, the public transit system of the City and County of Honolulu is comprised of the bus system which provides regularly scheduled, fixed route service and the special transit service which provides paratransit services for persons with disabilities; and

WHEREAS, the City bus system benefits the general welfare by increasing public mobility, lessening traffic congestion by diverting people from cars, reducing emissions and pollutants associated with vehicular travel, and decreasing the demand for limited on- and off-street parking; and

WHEREAS, as an essential municipal service, the City bus system is heavily patronized as evidenced by the following statistics reported by the Department of Transportation Services: actual ridership of 73.1 million in fiscal year 1997-98 and 69.7 million in fiscal year 1998-99 and projected ridership of 70 million in fiscal year 1999-2000; and

WHEREAS, notwithstanding the heavy public use and benefits derived from the City bus system, a large portion of the operating cost of the City bus system is subsidized by nonusers via the City's general and highway funds; and

WHEREAS, a smaller portion is funded by the farebox revenues which have ranged from 20 to 30 percent of the operating cost of the City bus system in recent years; and

WHEREAS, recognizing the monetary demands of the operating cost of the bus system on the City budget, the Council's 1995 Budget Summit recommended that the City Administration and the Council find a means of limiting the subsidy for the bus operations to 70%, or a similar amount, so that the subsidy does not grow unreasonably high; and

OCS00038.R01

TRANS



RESOLUTION

WHEREAS, to date, no policy exists on the desired farebox recovery ratio, which is the ratio of bus fare revenues to operating cost, and the desired subsidy levels for the City bus system; and

WHEREAS, the Council finds that such a policy is necessary to guide the City Administration and the Council in the proper planning and budgeting for the City bus system which includes:

- (1) Establishing a ridership goal for each fiscal year which must be achieved in order to generate the necessary fare revenues for that year;
- (2) Encouraging an evaluation of the impact of ridership forecasts and fare revenue projections when considering budgetary decisions affecting service levels; and
- (3) Setting a percentage limit on the subsidy for the City bus system;

now, therefore,

BE IT RESOLVED by the Council of the City and County of Honolulu that the funding of the annual operating cost of the City bus system, excluding special transit service and debt service, be governed by the following policy:

- (1) Bus fares shall be adjusted as provided under this policy so that the farebox recovery ratio does not fall below 27 percent nor exceed 33 percent; and
- (2) The portion of operating cost remaining after application of paragraph (1) and intergovernmental grants shall be funded with the City's highway funds and general funds;

and

**CITY COUNCIL**  
CITY AND COUNTY OF HONOLULU  
HONOLULU, HAWAII

No. 00-29, CDI

**RESOLUTION**

BE IT FURTHER RESOLVED that at the same time that the Mayor submits the annual executive operating and capital budgets to the Council for its consideration, the Mayor submit a report to the Council on: 1) the actual farebox recovery ratio for the previous fiscal year; 2) the estimated ratio for the current fiscal year, and 3) the projected ratio for the budgeted fiscal year; and

BE IT FURTHER RESOLVED that upon the adoption of this Resolution, all subsequent annual executive operating budgets submitted by the Mayor to the Council shall comply with this policy; and

**RESOLUTION**

BE IT FINALLY RESOLVED that the Clerk is directed to transmit a copy of this Resolution to the Mayor, the Director of Budget and Fiscal Services, the Director of Transportation Services and the Transportation Commission.

INTRODUCED BY:

Duke Rainum

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Councilmembers

DATE OF INTRODUCTION:

February 15, 2000

Honolulu, Hawaii

(003/01001/mj)

CITY COUNCIL  
CITY AND COUNTY OF HONOLULU  
HONOLULU, HAWAII

I hereby certify that the foregoing RESOLUTION was adopted by the COUNCIL OF THE CITY AND COUNTY OF HONOLULU on the date and by the vote indicated in the report.

ATTEST:

*Genevieve G. Woko*  
GENEVEVE G. WOKO  
City Clerk

*[Signature]*  
LONIC YOSHILUNA  
COUNCILMAN/PERSONAL OFFICER

0444 1/24/01

ADOPTED MEETING HELD		
1/24/01		
NAME	NO	A/E
BAUNEN	X	
DACHOLA	X	
DESOLO	X	
FELIX	0	
KOLABE	X	
MAIWAHO	X	
MURKINAM	X	
CHENO	X	
YOSHILUNA	X	
	8	1 0

Referencer:

Report No. Trans-33

Resolution No.

00-29

CDI

CITY COUNCIL  
CITY AND COUNTY OF HONOLULU  
HONOLULU, HAWAII

ORDINANCE  
BILL 20 (2002)

EXHIBIT C

SECTION 8. The monies described in Section 1 for the fiscal year July 1, 2002 to June 30, 2003 are appropriated as indicated to the following projects and public improvements in the UTILITIES OR OTHER ENTERPRISES Section. Nothing in this section shall be construed as restricting the allocation of monies among the work phase appropriations (e.g., planning, design, and construction).

PROJECT NUMBER	FUNCTIONS, PROGRAMS & PROJECTS	WORK PHASE	SOURCE OF FUNDS	TOTAL ALL FUNDS
<b>UTILITIES OR OTHER ENTERPRISES</b>				
<b>MAHELE TRANSPORTATION SERVICES</b>				
<b>TRANSPORTATION SERVICES</b>				
2003005	BRT WAIKAI TO WAIKAI ALIGNMENT Acquire right-of-way, design and construct roadway and system infrastructure improvements to support BRT between Heale and Waikele.	4,000,000 L 3,000,000 D 20,000,000 C 2,000,000 I	35,000,000 HI	35,000,000
1978005	BUS ACQUISITION PROGRAM Procurement and provision of quality assurance inspection in the manufacture, delivery, and testing of buses.	50,000 I 15,136,000 E	15,186,000 HI	15,186,000
2001120	BUS BAY IMPROVEMENTS Secure right-of-way, design and construct bus bay improvements.	10,000 L 50,000 D 260,000 C 20,000 I	340,000 HI	340,000
2002501	BUS REHABILITATION Purchase and install equipment to extend the life and useful service of the bus.	480,000 E	480,000 HI	480,000
2001507	BUS ROUTE STUDY Expanded system-wide survey and data collection to include the Primary Urban Center, East Honolulu, and the Windward Oahu areas.	500,000 P	500,000 HI	500,000
2001116	BUS STOP ADA ACCESS IMPROVEMENTS Design and construct ADA improvements at bus stops.	73,000 D 500,000 C 25,000 I	600,000 HI	600,000

UT-1

CITY COUNCIL  
CITY AND COUNTY OF HONOLULU  
HONOLULU, HAWAII

ORDINANCE  
BILL 20 (2002)

PROJECT NUMBER	FUNCTIONS, PROGRAMS & PROJECTS	WORK PHASE	SOURCE OF FUNDS	TOTAL ALL FUNDS
<b>BUS STOP SITE IMPROVEMENTS</b>				
2003007	Plan, design and construct bus stop site improvements including bus shelters, bus peds, bus bays, landscaping and furniture, at various islandwide locations to include but not limited to, Waikele Town, and various locations in Koolauloa.	2,000 L 50,000 P 330,000 D 360,000 C	749,000 HI	748,000
1993000	BUS PARATRANSIT SUPPORT EQUIPMENT UPGRADE Purchase bus/paratransit support equipment.	320,000 E	320,000 HI	320,000
1993063	MANHOLE ACQUISITION PROGRAM Procure and provide QA inspection in the manufacture, delivery, and testing of new vans.	20,000 I 940,000 E	960,000 HI	960,000
1994523	HIGH TECH BUS PASS Continue and expand installation of "smart card" system.	2,200,000 E	2,200,000 HI	2,200,000
2003325	KALUHI KAI TRANSIT CENTER (DILLINGHAM OFF-RAMP) Conduct environmental studies and planning development for a transit center on the major side of Dillingham Boulevard, near its intersection with Kamehameha Highway.	350,000 P	350,000 HI	350,000
2003043	KAMEHAMEHA HIGHWAY TRANSIT CORRIDOR & TRANSIT CENTERS Plan transit corridor and transit centers improvements.	50,000 P	50,000 HI	50,000
1999317	MIDDLE STREET TRANSIT CENTER Design and construct transit center improvements.	500,000 D 5,850,000 C 350,000 I 250,000 R	7,150,000 HI	7,150,000
2003040	MELUANI TRANSIT CENTER Construct and equip transit center improvements.	390,000 C 9,000 I	399,000 HI	399,000

UT-2

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
PHONE: (808) 525-4339 • FAX: (808) 525-4720 • INTERNET: WWW.CO.HONOLULU.HI.US

JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE KEDAO MATUAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPDS02-01827R

Ms. Michelle Spalding Matson  
3931 Gail Street  
Honolulu, Hawaii 96815

Dear Ms. Matson:

Subject: Primary Corridor Transportation Project

This responds to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your participation in a September 28, 2000 meeting, your oral testimony at the October 5, 2000 Special Transportation Committee Meeting, your oral testimony at the October 12, 2000 formal public hearing, your oral testimony at the October 26, 2000 Special Transportation Committee Meeting, and your oral testimony at the November 14, 2000 Special Transportation Committee Meeting regarding the MIS/DEIS. Part B responds to your oral testimony at the April 20, 2002 public hearing and your May 6, 2002 letter regarding the SDEIS.

Part A - MIS/DEIS Comments

1. *Embedded trackwork for an LRT system is estimated to cost substantially more per mile to supply and install than the high-capacity, high-quality paving needed for the BRT transitway (in the range of \$8-12 million more per mile). Over approximately 11.8 miles, the cost differential would be \$94-142 million. (Note: Power Source, states that both LRT and BRT can be powered by new embedded plate technology.)*

*Response:* The added cost for the LRT is for the steel tracks and additional utility relocation required. These costs are separate and in addition to the cost of the traction power system, which for both the BRT and LRT could be touchable embedded-plate technology.

2. *SMA and Zoning Maps absent for Waikiki area (Figures 3.1-5 A-E).*

*Response:* The Special Management Area for Waikiki was shown on MIS/DEIS Figure 3.1-6D, Special Management Area: Kalia - University. Zoning maps for Waikiki were shown on MIS/DEIS Figure 3.1-5D, Zoning Map: Kalia - University.

3. *Transit Center and Transit Station locations and descriptions absent (area covered, structural size and character, combined uses, access impact on surrounding community/communities, etc.) (Figures 3.1-6 A-D and 5.15).*

*Response:* The transit centers and park-and-rides identified in the FEIS as an independent project, or where the transit center will not be built for 12 years or more, will undergo their own

Ms. Michelle Spalding Matson  
Page 2  
November 13, 2002

environmental review process to address their related impacts and mitigation measures. At that time, details about each individual transit center's specific location, physical characteristics and operations will be documented.

4. *Although Kapiolani Park was placed in the Register of Historic Places in 1992, it is neither listed nor mapped as a Historic Resource in the DEIS (Kapiolani Park Trust Lands include the Honolulu Zoo and portions of Kapiolani Avenue and Jefferson School). (Figure 3.10-A and Tables 3.10-1 and 5.10-1) However, Kapiolani Park is mapped and listed as an adjacent Parkland Resource in the DEIS (Table 3.11-1 and Figure 3.11-1C).*

*Response:* Thank you for the information about Kapiolani Park, which is listed on the State Register of Historic Places. This information is included in the FEIS.

5. *Statistics are based on the 1990 Census.*

*Response:* Much of the demographic information (e.g., census tract data) needed for the MIS/DEIS was not available at the time the document was completed. The FEIS includes the most up to date census information available.

6. *Projected high ridership numbers to qualify for federal funding are derived from islandwide demographic totals not specific to Proposed Route.*

*Response:* The travel forecasts for the Primary Corridor Transportation Project were developed using travel forecasting procedures developed for the Oahu Metropolitan Forecasting Model Development Project. These procedures simulate the choices made by residents, business, and visitors regarding the nature, number, mode, time-of-day, and geographic orientation of trips that they make on a typical weekday. The procedures have been developed with data obtained in extensive surveys of Oahu households, transit riders, and air passengers. Future year forecasts reflect the population and employment forecasts that have been prepared by DBEDT and the zonal allocations that have been prepared by the City Department of Planning and Permitting.

The ridership forecasting process uses geographic specific transit networks which simulate the precise alignment of each bus route in the network. These simulation networks were prepared uniquely to reflect the route locations and service frequencies in each of the three alternatives. In accordance with FTA guidelines, in evaluating the performance of the alternatives the same distribution of future population and employment is assumed. Since it does not allow the differences in growth-shaping potential to be included in the analysis, the ridership results for the Refined LPA are likely understated rather than overstated when compared to the No-Build and TSM Alternatives.

7. *The BRT Alternative offers the ability to accommodate even further increases in demand, without major road construction. This could be achieved by using higher capacity BRT vehicles or further increasing the frequency of transit service. (Note: also a possibility of converting to new technology embedded plate, entrained LRT referenced above.)*

*Response:* The statement referred to in the MIS/DEIS states "The BRT Alternative could accommodate even further increases in travel demand beyond 2025 without major road construction". This statement is assuming the BRT Alternative is already implemented and its facilities constructed and therefore any future travel demand past 2025 can be accommodated without additional roadway construction.

There is no plan to convert to LRT in the future.



8. The In-Town BRT stops in the Chinatown Special District, and in the Hawaii Capitol Special District would not have canopies or other elements which would impact views of any important landmarks. The transit stop planned in front of the Duke Kahanamoku Statue on Kalakaua Avenue, also would not have a canopy. Other sensitive areas include the following: Waikiki Special District / Ala Moana Park (and Kapiolani Park / Kalia Road in Fort DeRussy / along Kalakaua Avenue (Note: Kapiolani Park and along Kapiolani Avenue were omitted).

**Response:** Kapiolani Park has been added as a visually sensitive area in the FEIS.

9. The archaeological resources, Iwi Kupuna, uncovered along Kalakaua Avenue in the vicinity of Kapiolani Park Beach, Kuho Beach, and Kapiolani Park are ignored in the DEIS.

**Response:** An assessment of the archaeological resources in the study area has been conducted for the FEIS and is discussed in Chapter 5. The project is aware of the potential that excavation work may uncover cultural/archaeological resources in certain areas. Therefore, we will employ archaeological monitoring during excavation work at certain locations, such as in Waikiki.

10. (Parklands and Section 4(f) Evaluation) This section discusses potential impacts to parks and recreational resources in the project area. None of the alternatives would change the character, function or use of any park or recreational resource in the study area, despite that the two build alternatives would use the Aloha Stadium overflow parking lot as a park-and-ride lot. This use of park property would violate the provisions of Section 4(f) of the U.S. Department of Transportation Act. The TSM and BRT Alternatives would enhance transit access to parks and recreational resources in the project area by improving the level of transit service to parks along the alignments of these alternatives. Vehicular access to Ala Moana Park would be adversely affected under the BRT alternative because of the conversion of two general-purpose lanes to transit lanes on both Ala Moana and Kapiolani Boulevards. (Note: The DEIS again ignores Kapiolani Park.)

**Response:** Kapiolani Park, which includes Honolulu Zoo, was identified on Table 3.11-1 of the MIS/DEIS as a park and recreational resource. A Section 4(f) Evaluation and park impact analysis regarding Kapiolani Park (Honolulu Zoo) was not conducted because it was uncertain at that time whether the traction power supply station (TPSS) would remain at that location. However, as a result of comments received regarding substations and further project refinements since the MIS/DEIS was released, the proposed TPSS location originally shown in the Kapiolani Park area will be relocated to a different site Ewa of Kapiolani Avenue. It should be noted that the substations will only be constructed if the technology selected, such as embedded-plate, requires them.

11. Of the many existing and planned public parks and recreational resources in the project area identified in Section 3.1.1, only one would be affected by the alternatives such as a Section 4(f) Evaluation is required. ... (Note: The DEIS again ignores Kapiolani Park.)

**Response:** See response to comment #10.

12. Parklands are publicly owned. Subsequent developments would not encroach on parks. Impacts on parklands would be assessed during the environmental review process for each subsequent development. (Note: Again, the DEIS again ignores the Kapiolani Park Trust.)

**Response:** See response to comment #10.

13. Through the use of electric bus technology, the BRT Alternative would reduce air and noise emissions ... regional air emissions would be less. ... would generally be quieter than conventional diesel buses. However, as with the TSM Alternative, the Regional BRT system would create a noise impact along a section of H-1 that would require noise mitigation. ... Transit center impacts will be separately analyzed in a subsequent phase since there are multiple alternative sites for each location. Under a worst [case] condition, the BRT Alternative could potentially displace up to 12 businesses. Up to two partial displacements are also possible. (Note: This segmentation of the cumulative project violates State law.)

**Response:** Cumulative impacts are addressed in the MIS/DEIS, SDEIS, and FEIS Section 5.13.1. The transit centers that will be constructed whether or not the Refined LPA is constructed will be analyzed as separate projects and have separate environmental documents prepared. The Primary Corridor Transportation Project's EIS addresses the impacts associated with the Kapiolani Transit Center, North-South Road Park-and-Ride and Aloha Stadium Transit Center.

14. The additional federal construction funds associated with the TSM alternative would translate into 3,080 person years of jobs created directly and indirectly during project construction. (Note: What is the differential factor describing "new jobs", above, vs. "person years of jobs"?)

**Response:** One of the economic impact measures in the FEIS is the number of person years of jobs generated during construction of the project. The forecasts include direct construction jobs created as well as jobs created through the multiplier effect into the economy of these new jobs. The reason that they are referred to as new jobs is that they would not exist unless there was an influx of "new" federal money from discretionary grants. The reason these jobs are stated as person years of jobs is that they are temporary during the construction period of the project. Permanent jobs (e.g. bus drivers, mechanics, etc.) are also presented in the economic impact section (5.1) of the FEIS.

15. ...the lower cost per new rider represents the more cost-effective alternative. ... the cost per new rider for the TSM Alternative is \$9.74, which is greater than the cost per new rider for the BRT Alternative of \$7.67 ... (Note: As determined by an assumption of a full 120 passengers per BRT vehicle and based on 1990 islandwide population data?)

**Response:** The cost-effectiveness measure utilizes the forecasted transit ridership for the year 2025 for each alternative. Transit ridership forecasts are based on a projected population of 1,083,000 for Oahu in 2025. Ridership forecasts assume that BRT vehicles will have loads of 100 passengers per vehicle during the peak hour in the area between Honolulu Community College and Union Mall but that they will have fewer passengers on board at other locations and at other times.

16. The Draft Environmental Impact Statement for the proposed primary corridor transportation project is deficient because it is missing key information. It should be returned for completion before it is further considered.

**Response:** It is to be expected that there would be relevant information missing in the MIS/DEIS. The environmental review process allows for agencies and the public to review the MIS/DEIS and to inform the sponsoring agency of any missing information. The FEIS incorporates additional and updated information.

17. For example, the draft EIS we are provided with has a map showing a circular rapid transit route through Waikiki. No specific transit stops or larger transit centers are on the map. Although in recent meetings, we were provided with more detailed photographs with specific transit stops only. However, three major transit centers are listed on a chart in the draft EIS. But the draft EIS describes the location of only two of what we now have been told are ten major transit centers planned.

**Response:** Regarding the examples given, possible locations of transit stops in Waikiki are shown on MIS/DEIS Figure 2.2-5 and possible locations of transit centers are shown in MIS/DEIS Figure 2.2-3. Refined locations are shown in the corresponding figures in the FEIS.

18. And what of peripheral parking to serve proposed dual tram rapid transit in Waikiki. Again, no locations to provide parking for outsiders and hotel employees are disclosed. What impact will this have on surrounding communities.

**Response:** Park-and-ride locations which could be used by workers and others destined for Waikiki are shown in Table 4.4-1 of the FEIS.

19. Further, the draft EIS states that the total cost of the system over 25 years will be \$1,060.3 million. \* In similar terms, this means the cost of \$1 billion. However, in recent meetings, we were told that this is really not true because the cost will only be \$600 million. But within 25 years, \$200 million will be needed for new equipment. This brings us to what new equipment will be needed within 25 years.

**Response:** In addition to the Regional and In-Town BRT elements, the Refined LPA includes expansion of the present bus fleet and the normal replacement of vehicles within this fleet over time as they reach the end of their useful life (assumed to be 12 years for buses and 15 years for BRT vehicles).

20. It is disclosed in the draft EIS the dual tram rapid transit dedicated lane electro-plate technology which is demonstrable preferred by the City administration for Honolulu but not yet fully tested in Trieste, Italy or built elsewhere can also be adapted for light-rail transit. In the draft EIS we are told that the contemplated tram rapid transit cannot be entrained or coupled with additional cars but light-rail transit can.

**Response:** The statement that embedded plate technology is being developed by the manufacturers for application on light rail as well as buses is not to say that the City is still considering LRT as a candidate technology for Honolulu. LRT has been rejected as an option.

21. We are told that the ridership projections extend to the year 2025. If and when more capacity is needed, will we then convert the dual tram rapid transit to light-rail transit with that 200 million. Will we then have a monorail train running through Waikiki and beyond to the Ala Wai Canal river walk and central park restaurants and shops were the golf course is now.

**Response:** There is no plan to convert the BRT to LRT post-2025.

22. In conclusion, what are the historical integrity and character of Honolulu. We are told that the draft EIS and shown at meetings that there will be a buffet shape double tram slicing past Iolani Palace. This plastic buffet will also be slicing past to the majestic Moana Hotel, the Waikiki shoreline viewplains and historic Kaplanihale Park.

**Response:** The physical appearance of the In-Town BRT vehicle has not been determined. The photo simulations are illustrative only of the type of technologies that have been implemented elsewhere. A vehicle could be designed unique to Honolulu to reflect a consensus vision of what is meant by "Hawaiian Sense of Place". In any event, the operation of vehicles would not affect the character of any historic property along the In-Town BRT alignment.

23. Is this the administration's interpretation of Hawaiian sense of place that has been so consistently eluding them? Does this mean that if Waikiki can't be Las Vegas at the moment at least Waikiki can mimic the artificial trappings of Las Vegas. Is this what the Japanese tour executive meant when he recently stated, "The most important asset in Waikiki is its beautiful nature, but we really would like to see some other products." To this we say thanks, but no thanks.

**Response:** See response to comment #22.

24. The City is nearing completion of reducing four traffic lanes to three lanes along Kalakaua Avenue in order to expand the Kuhio Beach recreation area. With the proposed addition of a dedicated rapid transit lane, traffic will be reduced to two lanes, including stopping and loading by commercial and other transportation vehicles. There is foreseeable increased congestion and gridlock consequent to separated transit corridor lanes and platforms consuming major portions of traffic arteries and thoroughfares, even if fewer people are driving cars and more are using rapid transit. The DEIS states that such would result in a reduced level of service for auto traffic within the urban core, but it is silent on how traffic congestion and gridlock will be mitigated within closures along Kaplanihale Boulevard and within Waikiki.

**Response:** The changes in lane designations identified above have already been completed and were incorporated into the planning for the Refined LPA. The lane designations for the Refined LPA on Kalakaua Avenue between Saratoga Road and Uluniu Avenue, is three mixed-traffic lanes and a semi-exclusive curb lane shared by the BRT, private buses, and right-turning autos. On Kalakaua Avenue between Uluniu Avenue and Kapahulu Avenue the BRT will operate in mixed traffic so there will be no change from today (i.e. three mixed traffic lanes).

The forecasts of year 2025 travel demand have changed from the DEIS to the FEIS, but the traffic analyses still indicate that the Refined LPA will not result in more congested traffic operations along the BRT corridors than the TSM or No-Build Alternatives. At the same time, the transit level of service (LOS) will be consistently better with the Refined LPA since it will provide an alternative, less congested mode of transportation to travelers in these corridors. This is especially beneficial in the Waikiki area where all alternatives are projected to result in congestion for motorists on Kuhio Avenue. Traffic operations for motorists on Kalakaua Avenue are projected to be similar between all Alternatives, since the BRT will be in semi-exclusive and mixed-flow lanes.

25. And what of the peripheral parking to serve the proposed dual tram rapid transit in Waikiki? The PUC-DEIS draft revision portends "a comprehensive transportation system can be accomplished only through the use and development of parking spaces on the periphery." The Joint Waikiki Task Force report states that peripheral parking locations need to be provided and that passenger service should be allowed to be structured by the employers for hotels and shops. A Waikiki Improvement Association representative recently stated, "The tram will improve access to Waikiki for employees. The priority is to accommodate the Waikiki work force."

**Response:** There are no parking locations proposed or planned as part of the Refined LPA beyond those specifically identified in the FEIS. The only new parking planned as part of this project would be at designated transit centers and park-and-rides, shown in Table 4.4-1 in the

FEIS. The park-and-rides shown are well outside of Waikiki, and could be used by Waikiki workers for accessing the BRT system thereby reducing the number of autos entering and parking in Waikiki.

26. Sites suggested for Waikiki use have included Kapahulu baseball field, Kapahulu Library, Jefferson School and the zoo parking lot. However, Kapahulu Advisory Group members have expressed concerns that a transit center and parking facility would work against uniting the Kapahulu Community, and that the site, which is not centrally located along Kapahulu Avenue, would be mainly used as parking for employees of Waikiki hotels, which have been established.

Response: See response to comment #25.

27. Again, no locations to provide parking for outsiders and hotel employees are disclosed in the DEIS. In Kapahulu, where there is a concerted effort to calm traffic and revitalize the community business district, providing peripheral parking for 38,000 Waikiki hotel employees would have a devastating impact on the community.

Response: See response to comment #25.

28. How can a rapid transit alternative be considered for Waikiki when it is undisclosed in the DEIS what impact transit centers and associated peripheral parking will have on the surrounding communities?

Response: There are no transit centers proposed in Waikiki, only eight transit stops. There are no parking locations proposed or planned to support the In-Town portion of the BRT beyond those specifically identified in the FEIS. The only new parking planned as part of this project would be at designated transit centers and park-and-rides.

29. Specific to the Diamond Head Special District, the DEIS curiously ignores the Diamond Head Historic, Cultural and Scenic District, within which is situated Kapahulu Park Trust lands. Here, a rapid transit stop is planned contiguous to the zoo parking lot. The DEIS mentions nothing about the proposed transit stop in the park and the impact on the historic Trust lands, which are registered on the State register. This is not even mentioned in the DEIS.

Response: Thank you for information about Kapahulu Park, which is listed on the State Register of Historic Places, and the Diamond Head Special District. These resources are identified as such in the FEIS. The Kapahulu transit stop, while adjacent to Honolulu Zoo, will not use any of its property. The transit stop will not affect the historic characteristics of Kapahulu Park, and will be consistent with the land use objectives of the Diamond Head Special District. In addition, after conducting a survey of urban street trees, the project will not relocate any tree along Kapahulu Avenue.

30. In addition, the DEIS states that the embedded plate technology of the rapid transit system requires substations every one-half mile. That is 24 buildings about the size of a small one-story house. Such a rapid transit electric substation is planned on Kapahulu Park Trust lands at the zoo parking lot adjacent to the transit stop. Notably, a court order precludes the use of Kapahulu Park Trust lands from being used for municipal facilities and provides for addition of adjacent lands to the Trust to compensate for ongoing municipal use of such lands for a fire station, while continuing to retain such lands within the Trust.

Response: See response to comment #10.

31. Also of significant absence in the DEIS is the fact that Kapahulu Park was listed on the State of Hawaii Register of Historic Places. Yet, the DEIS discloses that the monkeypod trees at this location are planned to be removed, relocated or cut down for rapid transit purposes.

Response: See response to comment #29.

32. Such significant impacts and the impacts on the surrounding community through which transit riders would commute to park at the zoo parking lot are not addressed in the DEIS. This leads us to believe that the cumulative impact of the larger project has not been addressed, much less disclosed, in the DEIS.

Response: The Kapahulu transit stop, while adjacent to Honolulu Zoo, would not use any of its property. The time limits on the metered parking at the zoo would be a deterrent to its use by BRT commuters. Discussion of potential cumulative impacts of the project with other past, present and reasonably foreseeable future actions is provided in Section 5.13 of the FEIS.

33. In conclusion, the community visioning team emphasizes that traffic calming solutions are required to ensure that Kapahulu Avenue adequately services and complements that area's street-front retail activity and to mitigate against the transformation of the town's main street into an unintended freeway.

Response: There is no plan to transform Kapahulu Avenue into an unintended freeway as part of the primary corridor transportation project. To the contrary one of the goals of the project is to encourage people to use public transportation so that the island's communities are more livable and less dominated by private autos.

34. However, the PUC-OP draft revision advocates urban villages and dedicated high-capacity transit corridors proposed for Date Street, Kapahulu Avenue and Waiialea Avenue in the Kaimuki area. Again, none of the indicated high-capacity transit corridor extensions and associated cumulative impacts of the larger project on surrounding communities are addressed in the DEIS. We emphasize that this should be accomplished before the DEIS is given further consideration.

Response: Discussion of potential cumulative impacts of the project with other past, present and reasonably foreseeable future actions is provided in Section 5.13 of the FEIS.

35. A Kaimuki Transit Center is shown in the DEIS, which states that the transit center would provide enhanced local circulation and access to the BRT system. At an OMPD meeting, a clarification was requested for the referenced Kaimuki Transit Center. The response clarified that the facility would be located on Waiialea Avenue. Why is the Kaimuki Transit Center designated with no perceivable transit connection or location?

Response: The transit hub in Kaimuki would be an on-street transfer point on Koko Head Avenue just north of Waiialea Avenue. It would be a convenient place for local residents to transfer between local circulator routes and routes which connect Kaimuki with other parts of the island.

36. Again, none of the indicated extensions and associated cumulative impacts of the larger project on the surrounding communities are addressed. We emphasize that this should be accomplished before it is given any further consideration.

Response: Discussion of potential cumulative impacts of the project with other past, present and reasonably foreseeable future actions is provided in Section 5.13 of the FEIS.

37. *Why would the City entertain the notion to intrusively impact internal traffic patterns and visitor center support services with a high-capacity transit corridor in Waikiki? Would not this transit Corridor -- where there could be more efficient use of time-proven technology and more time saved for more people over longer distances to the downtown destination?*

**Response:** The Refined LPA includes a Regional BRT component and an In-Town BRT component. The Regional BRT will serve Kapiolani and Central Oahu. The FEIS Chapter 4 presents the traffic and transportation effects resulting from implementing the Refined LPA. The Refined LPA would not affect visitor center support services and will improve the ambience in Waikiki by significantly reducing the number of diesel buses.

38. *Peripheral parking locations are undisclosed.*

**Response:** All parking facilities proposed as part of the Refined LPA are identified as park-and-ride or transit centers with parking in Table 4.4-1 in the FEIS.

39. *We understand that BRT Waikiki terminus is proposed for Kapiolani Avenue yet the only available parking is at the Zoo. This park is trust land and it has been ruled by the court that municipal facilities including the power substations of which one is located in the park on the plan would not be a proper use of the park.*

**Response:** As a result of comments received regarding the substation locations and further project refinements since the MISDEIS was released, the traction power supply station originally shown in the Kapiolani Park area was relocated to a location on Kuliho Avenue. (See FEIS Appendix B.) It should be noted that the substations will only be constructed if the embedded plate technology were selected.

#### Part B - SDEIS Comments

40. *I'm here today to testify in opposition to the In-Town portion of the BRT proposal in its entirety.*  
**Response:** Thank you for attending the public hearing and expressing your preference for the project.

41. *This is a very restrictive undertaking. It restricts the free flow of traffic.*

**Response:** It is not the conversion of lanes that will create the congestion, the congestion for motorists will be there without the BRT. When people are diverted onto public transit, congestion Alternatives. Conditions will be much better for BRT riders with the No-Build or TSM have a path clear of the congestion along much of the In-Town and Regional BRT routes.

42. *It restricts the free enterprise of private carriers by threatening their livelihood.*

**Response:** The Refined LPA is not designed to serve patrons of private transportation services. Section 5.1.5 of the SDEIS and FEIS provides additional details.

43. *It restricts open discussion of reasonable alternatives for real traffic congestion solutions.*

**Response:** A full range of transportation alternatives were considered and evaluated with extensive public input. Chapter 2 of the FEIS describes the alternatives that were considered during the course of the project.

44. *And last, but certainly not least, it restricts advancement of the quality of life in our urban area by overburdening the City taxpayers with unwieldy capital and operations costs.*

**Response:** The Refined LPA has been developed using value engineering to keep costs down so as not to overburden City taxpayers. Also the financing plan uses a phased approach to project implementation based on funding availability so as not to require an increase in City taxes.

45. *What does the In-Town BRT really mean? It means compounded congestion on main thoroughfares by a 60-foot tram every two to four minutes that eat up the traffic lanes.*

**Response:** See response to comment # 41.

46. *In spite of the City Administration's claims, this will not get cars off the road. It will cause cars to circumnavigate the main traffic thoroughfares into surrounding communities and neighborhoods, increasing noise and pollution in residential areas.*

**Response:** It is not the conversion of lanes that will create the congestion. The congestion for motorists will be there without the BRT. When people are diverted onto public transit, congestion Alternatives. Conditions will be much better for BRT riders with the No-Build or TSM have a path clear of the congestion along much of the In-Town and Regional BRT routes.

Even though there will be diversion of some motorists to transit with the Refined LPA, some traffic is likely to shift between parallel major thoroughfares. Tables 4.4-3 and 4.4-8 in the FEIS summarize these shifts. The neighborhood roadways adjacent to BRT corridor are generally discontinuous, making them inconvenient alternatives to the main thoroughfares for use by through traffic. While not forecast to occur, if traffic infiltration does become an issue, DTS has a variety of traffic calming measures that they can use to mitigate these types of problems.

47. *The SDEIS states BRT would result in over 18 percent work trips on transit and 14.7 percent with no-build. That's only a 3.3 percent increase in work trips at a cost of nearly one billion in 1998 dollars, not including debt service.*

**Response:** The cost of building new roads and widening existing roads to accommodate these motorists if they weren't diverted to transit would be much more costly.

48. *And the operations and maintenance is a whopping 71 percent subsidized by City taxpayers to supplement the fares taken in.*

**Response:** City Council members have consistently recognized the need to keep transit fares reasonable through a subsidy. In 2001 the City Council adopted Resolution 00-29, CD-1, that states in part, that the farebox recovery ratio will not fall below 27 percent nor exceed 33 percent. The balance is met by a General Fund subsidy.

49. *Yet Councilmember Beinum says in regards to -- City Council, last year, places a 33 percent ceiling on any transit subsidy.*

Response: See response to comment #48.

50. Together this is going to cost the City taxpayers 83 million in capital cost and 133 million in operations subsidy, with in-town fares only covering four percent of the operating costs.

Response: This is incorrect. Debt service payments on GO bonds for BRT related capital costs will average \$4.4 million per year. Average annual operating and maintenance costs for the BRT (i.e. costs in addition to the No-Build) would be \$7.2 million in 2007 and \$21.1 million in 2016. These are in YOY dollars. The fares will cover 27 percent of the BRT O&M costs, not 4 percent.

51. This capital and operating cost totals \$216 million in City taxpayer dollars paid annually as of 2010, with only three minutes saved for Downtown to Waikiki.

Response: The average annual increase in total City contribution over the No-Build Alternative for the period 2003 to 2016 would be \$30.2 million in YOY dollars.

52. Also, what the BRT really means is land development and higher property taxes along transit corridors, forcing small businesses out of once affordable business districts. The SDEIS is not shy about exposing this objective as it states repeatedly that more desirable land use and development patterns in coordination with specific developers are in store for our now stable urban communities.

Response: By itself, the In-Town BRT would have little influence on land use development in the PUC. In order for land use objectives identified in the Draft Update of the PUC DP to materialize, certain policies or actions would have to be implemented, such as changes in zoning regulations, land consolidations, tax incentives, changes in market conditions, etc. The value added by the In-Town BRT is that it would support transit-oriented development, such as mixed-use higher density land uses. Regardless of how the PUC DP process concludes, the PUC will continue to be highly populated and contain most of the employment on the island. These characteristics of the PUC necessitate a good public transportation system now and in the future.

53. Construction jobs are temporary, but the impact on our streets, in our neighborhoods, and on our livelihoods will be here to stay for several generations if the In-Town BRT is allowed to roll forward on the fast track, driven right at us by the big bucks boys. This is the wrong system for Honolulu's constrained urban area. The solution to gridlock is over the longest distance to serve the greatest number of people in the least amount of time.

Response: Comment noted. It is a statement of opinion. Besides providing temporary construction jobs, permanent jobs will result from the BRT project because of the need for additional drivers, mechanics, etc. Among all of the alternatives considered, the Refined LPA will serve the greatest number of Oahu residents at a reasonable cost.

54. Lack of correlation to pending Primary Urban Center development plan revisions.

Response: Discussion of project consistency with the Draft Update of the Primary Urban Center Development Plan is provided in Section 5.1 in both the MIS/DEIS and the FEIS.

55. Absence of traffic testing for cumulative traffic impacts of the proposed In-Town BRT

Response: The way the Refined LPA will offset the conversion of general purpose lanes to transit priority use is by attracting enough people out of the cars to reduce the number of autos on the

road. The OIMPO travel demand forecasting models used on this project are among the most sophisticated in the world. These models have indicated that the types of upgrades in transit service proposed with the Refined LPA will be successful in attracting enough people out of their autos to offset the proposed loss of lanes to general purpose traffic. The diversion of people from auto to transit will not happen overnight and could not happen during a "test" period involving the closing off of lanes since the features of the BRT system would not be in place and it would not be perceived as a permanent alternative that gives people confidence that they have an option once they give up their car. Closing off lanes in the absence of the BRT in place proves nothing that isn't known already.

56. Absence of information and location of impacts on two significant historic sites and landscapes.

Response: The potential impacts to historic sites are discussed in Section 5.10 in the MIS/DEIS, SDEIS, and FEIS.

57. Incomplete community participation and questionable support for specific components, facilities, and routes for the In-Town BRT Waikiki terminus.

Response: The BRT project's community involvement activities began in 1998 with the Trans 2K meetings and have continued throughout project development. Community participation activities have included five Trans 2K meetings, working group meetings, and hundreds of neighborhood board, city council, organization, etc. meetings where the project has been discussed.

58. Public and private circulator transportation, service and delivery operations impacts.

Response: There will be transportation impacts as a result of the BRT, including parking and loading impacts, as discussed in Chapter 4. Mitigation will be considered on a case by case basis for areas of concentrated parking and loading impacts. Loading areas in Waikiki and other commercial areas along the In-Town BRT corridor will still be available at designated hours. In some cases in Waikiki, new pull out bays will be constructed to accommodate passenger vehicle loading and unloading on Kuliou Avenue.

59. Infrastructure and utility impacts

Response: Section 5.12 presents the Construction Activity Impacts to Infrastructure and Utilities.

When relocation or modifications of existing active utilities are necessary, efforts will be made to keep them in service during construction.

60. Absence of defined and proven technology

Response: The City will be proceeding with hybrid-electric vehicles on the In-Town BRT. These vehicles have been proven in revenue service and are commercially available. In 2008 a decision will be made whether to proceed with embedded-plate technology, which by then should have had enough time being in revenue service in other cities to be considered service proven. If it hasn't proven itself the City has the option of continuing with hybrid-electric vehicles.

61. Absence of cumulative capital costs, operations subsidies and debt service as projected beyond 1998 dollars.

**Response:** Capital costs, operating subsidies, and debt service are shown in Year of Expenditure dollars throughout the financial narrative and tables. Year of Expenditure dollars are calculated to include a projected rate of inflation, using a combination of national and state trends.

62. **Absence of the defined City taxpayer burden to carry the non-federal cost of the proposed project**

**Response:** The local costs are identified by type, year, Year of Expenditure amount, and proposed revenue source.

63. **Absence of ancillary facilities descriptions, locations, linkages and impacts on surrounding communities; and**

**Response:** Comment noted. It is a statement of opinion. The MIS/DEIS, SDEIS, and FEIS present the benefits and impacts associated with the BRT project, including ancillary facilities.

64. **Compromised present quality of life and Hawaiian Sense of Place; e.g. adverse impact of dedicated/embedded rapid transit infrastructure, equipment, utilities and facilities on scenic viewplanes and landscapes**

**Response:** No project element, including transit centers and stops, traction power supply stations (TPSS), and ramps, are expected to adversely affect important or scenic viewplanes. Transit stops within historic and special districts will be carefully planned and designed to not impact the sensitive viewplanes, landscapes or other important characteristics of these districts.

65. **Further, there is a question of incomplete expansion and improvement of the present Transportation Service Management program to meet its fullest in-Town potential, including maximizing the hub-and-spoke circulator system, express vehicles, and public and private ridership incentives.**

**Response:** The phasing for the In-Town BRT will involve a transition over time from the existing bus system to a hub-and-spoke system that complements the BRT.

66. **Finally, it appears that the larger objective of providing mass transit to serve the greatest number of people over the longest distance in the least amount of time remains to be comprehensively addressed.**

**Response:** The FEIS clearly and comprehensively addresses how the Refined LPA within given financial constraints will serve the greatest number of people over the longest distances in the least amount of time.

67. **The SDEIS states that to give transit the priority necessary to make it an attractive alternative to the automobile, some lanes along the proposed In-Town BRT alignment will need to be converted from general-purpose lanes to transit only lanes, which will ultimately result in reduced number of lanes for general purpose traffic (see 2-19).**

**Response:** This is a correct statement.

68. **The SDEIS further states that major regional roadways would still experience traffic bottlenecks in 2025, and only the BRT could provide a non-congested travel mode through key intersections in**

**the Urban Core that still would be at or near capacity, because the In-Town BRT would be buffered from traffic delays, which would result in additional reduced level-of-service for automobile traffic within the Urban Core (see 2-19 and S-8).**

**Response:** The FEIS corrects this statement so that it is clear that it is not the conversion of lanes that will create the congestion, the congestion for motorists will be there without the BRT. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

69. **Thus, the In-Town BRT becomes a major part of the problem, not the solution. Prioritization of the BRT at congested intersections would mean stopping all other traffic at the intersections it approaches, in effect compounding congestion in the urban core.**

**Response:** The potential for the BRT vehicles to extend the green phase will only be implemented at locations where it will not significantly impact cross street traffic.

70. **This, coupled with the integration of exclusive and semi-exclusive transit lanes and median loading platforms, will for the most part preclude normal traffic from using the main arteries of Honolulu due.**

**Response:** See response to comment #68.

71. **Therefore, because of such lane restrictions and delays, the City anticipates that motorists will be forced out of their cars onto the In-Town BRT, when in fact, motorists will choose to take alternate routes through surrounding communities and neighborhoods instead.**

**Response:** See response to comment #68.

72. **Indeed, the SDEIS discloses that during construction of In-Town BRT transit lanes within existing streets, a public information program will disseminate information on detours and recommended alternative routes in order to minimize public inconvenience (see S-12 and S-15). Certainly, this information will be helpful to motorists in knowing which surrounding community and neighborhood streets are most accessible.**

**Response:** We concur and will work with not only the immediate neighborhoods surrounding the construction area, but with local media to alert the general public of construction activities, recommended detours, etc.

73. **However, the SDEIS does not address the significant impacts on the surrounding areas resulting first from cumulative construction impacts or subsequently from restricted traffic lanes and the In-Town BRT's prioritization over vehicular traffic.**

**Response:** The MIS/DEIS, SDEIS, and FEIS, Chapter 4 present the traffic and transportation effects associated with implementing the BRT. Chapter 5, Section 5.12 presents the construction impacts and Section 5.13 presents the cumulative effects.

74. **Further, the City has conducted no comprehensive traffic count studies for the major thoroughfares proposed to be converted to BRT corridors.**

**Response:** Traffic impact analyses have been performed for all of the streets along which the In-Town BRT will operate. The findings are discussed in detail in Chapter 4.

75. *And the City has ignored concerns reflected in measures brought before the City Council and requests at public meetings to test the impacts of such lane closures on Honolulu's urban streets.*

**Response:** See response to comment #55.

76. *How would neighborhoods surrounding BRT corridors be buffered from traffic overflow and congestion resulting from the buffered BRT and vehicular level-of-service delays?*

**Response:** See response to comment #46.

77. *How would ensuing traffic congestion otherwise be mitigated in neighborhoods surrounding BRT corridors?*

**Response:** See response to comment #46.

78. *Prior to seeking the funds to construct the proposed In-Town BRT, the City must determine the significant physical impact this will have on the areas, communities and neighborhoods surrounding the In-Town BRT corridors.*

**Response:** This was done in the MISDEIS, SDEIS, and FEIS.

79. *By implementing a simple two-to-three-month trial period of closing off the In-Town BRT lanes proposed to be closed or limited to through traffic, and ramping up existing express and mauka/makai bus service with a mass transit publicity campaign, the effects of any ridership increase and traffic congestion impacts will become obvious. WHY HAS THE CITY ADMINISTRATION REPEATEDLY REFUSED TO IMPLEMENT THIS TRIAL PROGRAM, AND WHAT TRAFFIC IMPACTS ARE THEY HESITANT TO DISCLOSE? By avoidance of this comparatively simple and cost-effective trial measure, the City administration appears to be concealing what could become Honolulu's worst traffic nightmare - the significant negative impacts of the In-Town BRT.*

**Response:** The way the Refined LPA will offset the conversion of general purpose lanes to transit priority use is by attracting enough people out of the cars to reduce the number of autos on the road. The OMO travel demand forecasting models used on this project are among the most sophisticated in the world. These models have indicated that the types of upgrades in transit service proposed with the Refined LPA will be successful in attracting enough people out of their autos to offset the proposed loss of lanes to general purpose traffic. The diversion of people from auto to transit will not happen overnight and could not happen during a "test" period involving the closing off of lanes since the features of the BRT system would not be in place and it would not be perceived as a permanent alternative that gives people confidence that they have an option once they give up their car. Closing off lanes in the absence of the BRT in place proves nothing that isn't known already.

80. *The SDEIS states that the last detailed boarding study was conducted in 1991; that in February, 2000, DBEDT revised its 2025 general population forecast for Oahu downward by 5%; that the BRT would improve the person-carrying ability within the Urban Core by an average of 11% over the no-build alternative; that such capacity would be only slightly greater than the demand; and that the demand would amount to only a 3.3% increase in work trips (see 3-11 and S-8). Thus*

*there would be a maximum capacity increase of 7.7% for non-work trips. But these trips are not defined and the SDEIS ignores the fact that both the Urban Core resident population and visitor count have continued to decrease over the past ten years.*

**Response:** The economy has been weak in Honolulu for the past decade. This is not forecast to last forever. The planning horizon for the FEIS is the year 2025. The economy is expected to recover between now and then and the growth in population and jobs forecast are expected to be realized.

81. *Indeed, the majority of Honolulu citizens will not give up their automobiles to hop on the In-Town BRT simply to go from point A to point B. Many have two or even three jobs to maintain costly living expenses in Honolulu. Many have active families that require transportation to various activities, such as after-school soccer and baseball in the year-round mild climate. Many transport bulk purchases both during and after work hours from popular warehouse stores. And many of these tasks are required to be accomplished in between the others.*

**Response:** The BRT will give Oahu residents an alternative to driving their cars, but is not intended to replace the automobile. It only takes a small percentage of auto drivers to divert to transit to make a significant difference.

82. *In addition, would the City choose to suffocate private enterprise by attempting to displace non-subsidized private sector passenger transportation with the City subsidized In-Town BRT?*

**Response:** The Refined LPA is not expected to drive any private carriers out of business. The service the In-Town BRT will provide is oriented to residents and workers in the urban core not to tourists, which is the market served by private carriers. The BRT will not take business away from tour bus and shuttle operators, since it will not pick-up tourists at their hotels and take them on various scenic tours. It will not take them to-and-from the Airport. It will not take them to-and-from their hotels and the Convention Center. It will not pick them up at the cruise ship terminal and carry them and their luggage directly to their hotels. And unlike the private shuttles it is not designed to operate in a loop that only goes between Waikiki hotels and the various tourist sites of interest. Some tourists may end up using BRT since it does serve some of the same destinations that the tourists want to go to, but the In-Town BRT goes to these places because most of these are also major employment sites or sites where local residents go to as well. The number of tourists expected to use the public transit system with the Refined LPA is forecast to be no greater proportionally than today (i.e. around 10-15 percent of total daily boardings).

83. *Public-private partnerships can be successfully forged to eliminate, rather than create, additional transportation subsidy burdens on the local taxpayer, thus benefiting the public interest as well as promoting the welfare of private enterprise and the local economy.*

**Response:** Where it is possible, and cost-effective to do so the City intends to contract with private passenger carriers to provide some of the service in the hub-and-spoke network.

84. *Contrary to the City's claims, the BRT will not provide an "attractive alternative" to the automobile. It will provoke a forced alternative to the automobile - one that would be as roundly opposed as the State's recently quickly-failed traffic camera citation program, which is now going to cost the State taxpayers millions of dollars to undo.*

**Response:** Comment noted. It is a statement of opinion. No one will be forced to ride the BRT.

85. The SDEIS states that the In-Town BRT vehicles would operate at-grade in exclusive transit lanes along major arterial streets (see Table 2.2-4). In other locations, the In-Town BRT system would operate either in semi-exclusive lanes (used by transportation carriers or vehicles making turns) or in mixed traffic. Along about 38% of its length, the In-Town BRT would run in transit lanes in the median of existing arterial roads (e.g., sections of Kapitol and Dillingham Boulevards). Along 29% of the alignment, the system would run along the curb in semi-exclusive lanes. Semi-exclusive lanes would be shared with right-turning vehicles, and in the case of Waikiki, with other buses (public and private) and trolleys. For the remaining one-third of the alignment the BRT would operate in mixed traffic (see 2-11).

**Response:** These are quotes from the SDEIS. They do not require a response.

86. Many recent failing water mains and sewer lines have already demonstrated the serious impact of providing only one or two lanes available to through traffic. The In-Town BRT would be intensifying this impact by taking the following:

Downtown  
Dillingham - 2 center lanes  
Hawai'i - 2 lanes  
North King - 2 lanes  
Hotel - 2 lanes  
Bishop - 1 curb lane, makai  
Aloha Tower Drive - 1 curb lane, makai  
Alakea - 1 curb lane, mauka

Kakaako Mauka  
Nimitz - undefined  
Ala Moana - undefined  
Channel - undefined  
Iiwo - undefined  
Ward - undefined  
Auahi - undefined

Kakaako Mauka  
Halekuanui - 1 lane  
South Street - 2 lanes  
Pohukaina - 2 lanes  
Auahi - 2 lanes  
Queen - 2 lanes

Richards - 1 lane  
South King - 1 lane  
Pensacola - 2 curb lanes, Ewa side  
Kapitol

a) 2 center lanes to Alkinson  
In mixed traffic to Kakaako  
c) 2 curb lanes to Isenberg  
In mixed traffic to University

University - 2 exclusive center lanes to South King  
South King to UH - 1 semi-exclusive curb lane  
UH to Kapitol - 1 exclusive center lane

**Response:** Further refinements have been made to the In-Town BRT to reduce traffic impacts since publication of the SDEIS. It is not the conversion of lanes however that will create the congestion. The congestion for motorists will be there without the BRT. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

UH Manoa  
Richards - 1 lane  
South King - 1 lane  
Pensacola - 2 curb lanes, Ewa side  
Kapitol  
a) 2 center lanes to Alkinson  
In mixed traffic to Kakaako  
c) 2 curb lanes to Isenberg  
In mixed traffic to University  
University - 2 exclusive center lanes to South King  
South King to UH - 1 semi-exclusive curb lane  
UH to Kapitol - 1 exclusive center lane

**Response:** See response to comment #86.

88. Waikiki Loop  
Ala Moana -  
Keala - add 2 lanes to Saratoga  
Saratoga - 2 lanes  
Kakaako - split 1-way couplet  
Kakaako to Kapaehulu - 1 semi-exclusive makai curb lane  
Kapaehulu to Kuhio - 1 semi-exclusive curb lane at  
Waikiki Terminus - Kapitol Park Transit  
Stop  
Kuhio to Saratoga - 1 semi-exclusive mauka curb lane

**Response:** See response to comment #86.

89. To compound this conundrum, the City administration proposes to raid the City's Sewer Fund to balance the City's budget to ultimately fund the first \$35 million of the Waikiki-to-Downtown segment of the In-Town BRT (see Exhibit C, attached). However, if the Sewer Fund is raided for the first \$35 million this year, how will the remaining 82% work trips in automobiles (see S-8) get through the torn-up streets with the BRT consuming traffic lanes as the 100-year-old sewer lines continue to break? The traffic will not magically disappear, as the City administration would have us believe. Again, it will simply be rerouted to a greater magnitude via ripple effect into and through surrounding neighborhoods and communities.



**Response:** The City Council has approved the budget for funding the first branch of the In-Town BRT. In the City's representative form of government it is the Council's decision as to how public funds are spent each year.

90. Further, the SDEIS states that the construction implementation schedule would focus construction-phase impacts in one area at a time by geographically distributing the work at each phase of construction, with development of the In-Town BRT system between 2002 and 2006, with the initial fleet of In-Town BRT vehicles being ordered, manufactured and delivered in 2003 and 2004, and with testing and start-up occurring in 2005 (see 2-25 and 28). However, the SDEIS also states that a decision on the In-Town operating system technology may be made in another year, as existing technologies either do not satisfactorily meet the City's expectations and specifications or have not advanced to a state where they are considered service proven. As no decision has been made on an appropriate technology, how can capital and operating costs be projected with any reliability?

**Response:** The phasing plan as outlined in the FEIS calls for the use of hybrid-electric buses initially along the In-Town BRT, with a decision to convert to embedded-plate technology (EPT) made in 2008, if EPT is service proven by then.

91. In addition, the SDEIS states that construction schedules would be phased according to the availability of funds. Therefore, the construction schedule would be flexible and could be delayed according to fiscal constraints (see S-16). In viewing the above waiving revelations en toto, it does not appear that the City has an efficient and effective plan to implement this project as stated, or to even mitigate its impacts on the Honolulu urban community. With deficiencies of such magnitude, it can be concluded that traffic solutions for Honolulu require further study for more appropriate and effective alternatives.

**Response:** The MISDEIS, SDEIS, and FEIS Chapter 2 present the project's implementation plan, and Chapter 6 presents the financing plan. The environmental documents present the traffic and transportation impacts in Chapter 4 and environmental impacts in Chapter 5. No further study is needed.

92. Notably, the SDEIS states that the BRT would be superior to the TSM alternative in terms of regional mobility, and that greater mobility would be provided by the BRT because of increases in transit and HOV use (see S-8). Thus, the question arises as to why the In-Town BRT is proposed to consume lane space in the urban core when it could be placed in more efficient use over longer distances in the regional Ewa-Downtown application, and when greater flexibility and mobility can be provided by smaller high-occupancy vehicles with a greater number of routes and more convenient stops in the urban core in lieu of fixed 130-person capacity trams on dedicated lanes in a confined area?

**Response:** Buses operating as collectors will pick-up people in the less dense outlying areas and bring them to transit hubs where they can transfer to longer distance express buses that benefit from using the priority lanes on H-1 and In-Town on designated arterials. It is only logical to employ the priority lane concept along the sections of the corridor where the most people will be riding the system in the same direction at the same time and that is in the urban core not in the outlying areas.

The Regional BRT includes A.M. and P.M. zipper lanes along H-1 that will benefit both bus passengers and HOV occupants. In-Town bus passengers will benefit from the BRT priority lanes and HOV occupants will benefit from the reduced congestion overall with the Refined LPA, and more specifically from SDOT projects that will increase the capacity of H-1 and Nimitz Highway by the addition of a contra-flow HOV lane.

93. The In-Town BRT portends surging land re-development and higher property taxes along transit corridors, forcing small businesses out of once affordable business districts. The SDEIS is not shy about exposing this objective, as it states repeatedly that more desirable land use and development patterns in coordination with specific developers are in store for Honolulu's established urban communities. In fact, the SDEIS identifies one criterion for selection of a new transit technology as being a specific alignment to "evolve the desired land use response from land developers" (see 2-19). Thus, the SDEIS demonstrates little to no concern for the future welfare of the small businesses, patrons, and residents of the areas proposed to be impacted by the In-Town BRT transit corridors, and indeed, is ultimately writing them out of the equation in favor of increased development and density - supporting not the community, but the In-Town BRT.

**Response:** The potential for an area to change depends upon many factors of which transportation accessibility is just one factor. Land use policies, zoning, parcel size and availability, availability and condition of utilities, and market demand are other factors. As the Refined LPA is implemented the City needs to establish land use policies and incentives that encourage the retention of small businesses where it is deemed important to do so and to focus development interest on designated redevelopment areas and sites.

94. According to the SDEIS, the proposed In-Town BRT will necessitate 17 businesses to relocate, along with up to 47 partial business displacements. Fair market compensation for land, buildings, and uses would be provided to property owners directly affected by right-of-way requirements, and affected businesses would be encouraged to plan moves in advance so that relocation would occur with minimal delays and inconvenience (see S-10 and S-12). Further, land value increases generated by development rights will cause property taxes to skyrocket, and the remaining small businesses will be unable to survive in the redevelopment area. Thus, for example, the BRT corridor along Dillingham Boulevard would incite removal of small businesses, consolidation of lots, and construction of highest and best use buildings, both in value and density - serving not the community, but the developer.

**Response:** See response to comment #83.

95. The SDEIS states that where on-street parking is removed to permit BRT transit lanes, new neighborhood parking facilities would be considered to replace on-street parking, but only if they served a community purpose (see S-6). Thus, many residents in single-family dwellings along BRT transit corridors, including University Avenue, would be without adequate parking for their homes unless this becomes a larger community need. Once determined as a community need in this established residential area, one or more residential lots in a central location would be required to be taken by the City's power of eminent domain to build a multi-level parking garage in order to fulfill the public purpose of replacing the public parking that was lost to the BRT. Again, this appears to be contrary to the welfare of the established community.

**Response:** In urban communities such as Downtown, McCully/Moliihi, and Ala Moana trade-offs need to be made on the best use of the limited public rights-of-way along arterial streets. In the case of University Avenue far more people will benefit from increasing the people carrying ability

of this street than will be impacted by the removal of on-street parking. There are 78 on-street parking spaces on University Avenue that will be removed to enable over 6,000 passengers a day a less congested route. Whether replacement parking is needed is up to the community. Representatives from the affected Neighborhood Board indicated, at least initially, that they did not think that replacement parking would be required by the community if it involved the loss of any residences, businesses, or parks. Other approaches that do not require the displacement of residences, businesses, or parks, (e.g. using diagonal parking on some local streets; shared use of commercial or institutional parking at night by residents, etc.) can also be explored if the community wants replacement parking.

96. Here also, the SDEIS lists another criterion that the selected transit technology must be flexible enough in order to not pre-empt parades or other activities along the alignment. Yet the proposal does nothing to ensure that the In-Town BRT does not disrupt businesses and residences as it bisects the communities and business districts it passes through every 2 to 4 minutes via dedicated transit corridors. In fact, the SDEIS aggressively proposes to remove 912 parking spaces and 725 feet of curbside loading space to provide for dedicated curbside BRT lanes (see 4-25 and 4-26).

Response: BRT operation will be much like that of a bus, and bus service is currently provided on virtually all streets proposed for use by the BRT. Therefore, no impact on neighborhoods and businesses is expected from the BRT operation, beyond those disclosed in the EIS. BRT operation will not adversely affect communities and business districts, as demonstrated by the Hotel Street bus mail operations in the downtown/Chinatown area.

On-street parking and loading zone impacts have been reduced since the MIS/DEIS. There will be some parking and loading space impacts as a result of the BRT, as discussed in Sections 4.3 and 4.4 of the FEIS. Mitigation will be considered on a case by case basis for areas of concentrated parking and loading impacts. Freight loading areas in Waikiki and other commercial areas along the In-Town BRT corridor will still be available at the currently designated hours. In some cases in Waikiki, new put out bays will also be constructed to accommodate commercial vehicle loading and unloading (e.g. on Kuhio Avenue).

97. This impact would be greatest in commercial business and Waikiki resort zones within the Urban Core, where loading areas are vital and must be accessible in order to ensure efficient and timely delivery of goods and services. However, the SDEIS fails to address established loading requirements of the private trucking and delivery industry in Waikiki and other commercial areas along the In-Town BRT corridors. Further, the SDEIS fails to address the cumulative economic impacts of the In-Town BRT on surrounding businesses and resorts, and private delivery and non-subsidized passenger transportation services when one lane is removed from Bishop and Aleka Streets and Kalakaua, Kuhio and Kapahulu Avenues, and when two lanes are removed from Kapoian and Dillingham Boulevards and University Avenue.

Response: Impacts to passenger and freight loading zones have been reduced since publication of the MIS/DEIS. Freight loading areas in Waikiki and other commercial areas along the In-Town BRT corridor will still be available at the currently designated hours. No lanes will be converted for BRT use on Bishop Street, Aleka Street, or Kapahulu Avenue. Private buses will share the curbside BRT priority lanes on Kalakaua and Kuhio Avenues. Measures have been taken on Dillingham Boulevard (widening, turnouts, and use of alternate access) to accommodate freight delivery.

98. The BRT SDEIS makes no mention that either Kapoian Park or Irwin Memorial Park are listed on the Hawaii State Register of Historic Places and eligible for the National Register of Historic Places (see Table 5.10-1 on 5-45). Yet, the BRT SDEIS describes the BRT 60-foot tram running curbside to these sites.

Response: Kapoian Park is identified as an historic property in the FEIS because a transit stop will be located adjacent to the park. The transit stop will be constructed within the Kapahulu Avenue right-of-way, and no park property will be used. In response to concerns expressed at a meeting with representatives of the Kapoian Park Preservation Society the location of the BRT stop on Kapahulu has been shifted further mauka. (See Appendix B Drawing No. 1-35).

Irwin Memorial Park will not be affected by the project since the BRT will operate in mixed traffic using existing streets and the existing bus stops near the Maritime Museum at Aloha Tower Marketplace.

99. Further, Kapoian Park is a known habitat for the white tern, listed as endangered by the State of Hawaii and a federally protected species under the Migratory Treaty Bird Act (see S-1f).

Response: This information about the white tern is disclosed in Section 5.7 of the FEIS, which also states the results of interagency coordination that has been conducted with the State Department of Land and Natural Resources, Division of Forestry and Wildlife (DLNR-DOFAW) and the U.S. Fish and Wildlife Services (USFWS).

100. There is a serious question as to why the SDEIS does not recognize and acknowledge Kapoian Park, which is nearly 200 acres, as a significant site contiguous to the proposed In-Town BRT corridor. The SDEIS states that the In-Town BRT terminus is at an undefined transit stop on the Koko Head side of Kapahulu Avenue between Kalakaua and Kuhio Avenues (see 2-16 through 19 and 3-3 through 3-7). This places the BRT Waikiki turnaround transit stop, with attendant 8-ft wide, 160-ft long raised loading platform, ADA ramps and railings, and power supply sub-station upon and within the Kapoian Park Trust lands on Kalakaua Avenue and fronting the Honolulu Zoo (see S-1, 2-12 and sheet TRM 14 dated 7-24-00, Exhibit A as attached). In addition to Kapoian Park being listed as a Registered Historic Site, the Court has ruled that municipal facilities are not an appropriate use of Kapoian Park Trust lands (see SP No. 89-0015, Conclusions of Law and Order, 1991).

Response: The In-Town BRT stop will not use any part of Kapoian Park. The transit stop will be totally within the Kapahulu Avenue right-of-way, including provisions for ADA access. The TPSS will be located in an empty lot on the Ewa-makal corner of Kapahulu Avenue and Kuhio Avenue. It will not be placed on park property.

In response to concerns expressed at a meeting with representatives of the Kapoian Park Preservation Society the location of the BRT stop on Kapahulu has been shifted further mauka. (See Appendix B Drawing No. 1-35).

101. In view of the above, the location of the proposed BRT route's attendant municipal facilities would therefore appear to be a violation of the historic trust provisions, as well as a significant negative impact on the historic landscape and viewplanes of this historic site.

Response: See response to comment #100.

102. While the City claims that only shelter and street furniture improvements are planned to be constructed at the Kapiolani Park terminus (see 2-16), there is additional concern that the cumulative impact of the municipal facility components of the In-Town BRT transit system will involve into much more than a mere bus stop at this terminus. Indeed, the SDEIS states that a) certain local routes would be converted into circulators to feed the In-Town BRT system and new circulator routes would provide frequent service from the transit stop on the Koko Head side of Waikiki (see 2-5); and b) project elements such as ... transit stops ... provide urban design opportunities to improve existing landscapes with cohesively designed architectural elements, landscaping, street furniture, street trees and lighting (see S-10). Thus, Kapiolani Park is planned to be the access point from East Honolulu to the BRT system's Waikiki-to-Downtown route, and there is additional concern that the Design Opportunities the City administration has planned for the proposed BRT project could most assuredly impact the historic landscape of Kapiolani Park as well with expanded parking and transit center amenities to service East Honolulu access to the In-Town BRT system at this Waikiki terminus (see 2-18).

Response: The Kapiolani BRT stop will be an on-street transfer point for some circulator bus routes not an off-street transfer center. To serve circulator routes the local bus stop at curbside on the Ewa side of Kapiolani Avenue at Carwright Road will be relocated to Lemon Road. The BRT stop will be across the street at curbside on the Koko Head side of Kapiolani Avenue. Transferring passengers will use the crosswalk at Lemon Road to connect between the routes. There is sufficient right-of-way on both sides of Kapiolani Avenue to accommodate the stops without interfering with pedestrian flows or impacting Kapiolani Park. Design of the BRT stop will take into account the historic landscape of Kapiolani Park.

What is proposed is not an off-street transit center or a park-and-ride. In fact the services which will be added should make Kapiolani Park even more accessible by transit and help reduce the auto and parking congestion that exists in the area today.

103. Along with ignoring that the selected Waikiki transit terminus is a historic site, the SDEIS also does not address the visual impact of the 60-foot long, 15-foot-high double tram cars impeding the significant historic park, Diamond Head and shoreline viewshades every 3 minutes, nor the structural impact of the raised and elongated loading platform and power supply station within the monkeypod trees and open space of this historic landscape along Kapiolani Avenue. From this it can be easily determined that there is much about the Waikiki/Kapiolani segment of the In-Town BRT proposal that remains to be disclosed. There are many more unanswered questions about the impact of such a plan on this historic site, including but not limited to the question of what is to become of this significant area if this East Honolulu public transportation terminus is implemented?

Response: The In-Town BRT transit stop near Kapiolani Park will require special design treatment, similar to other proposed transit stops in or near Chinatown, the Capitol District, Thomas Square and other important visual and historic locales.

Visual impact analysis is not appropriate for vehicles, including the In-Town BRT vehicles, which are essentially more environmentally friendly buses. For your information, the height of the BRT vehicles would be about ten and a half feet, not 15 feet.

As described in response to comment #102, the TPSS will not be located in Kapiolani Park.

The Kapiolani Avenue Transit Stop will not be used as a transit center. Although transfers will occur, they will be conducted in the same manner as bus transfers are conducted today at many on street transfer locations.

104. Further, while transit stops, centers and transfer points are shown for the In-Town BRT from Iwilei to Kamakee, no transit stops or transfer centers are shown for Waikiki in the SDEIS. However, as with the University/King Transit Stop accessing the mauka In-Town BRT route with peak period service proposed to be generally provided every 5 to 15 minutes and off-peak service every 15 to 30 minutes (see 2-7), the Kapiolani Transit Stop at the Waikiki BRT terminus is clearly a foreseeable candidate as a transit center transfer point for bus routes from East Honolulu accessing the Waikiki-to-Downtown In-Town BRT route.

Response: As indicated in response to comment #102, it will be an on-street transfer point not an off-street transit center.

105. Surely these concerns and any impact disclosures prompted there from should be properly addressed in an additional SDEIS specific to the Waikiki segment in accordance with the established Environmental Impact Review process for proposed projects funded by public revenue sources.

Response: The MIS/DEIS, SDEIS, and FEIS Chapter 2 presents the project description, including the Waikiki BRT stops. The environmental documents also disclose the impacts and benefits associated with implementing the BRT project.

106. As an example, the SDEIS states that the Kakaako Makai Branch would operate between the Iwilei Transit Center on the Ewa end and an undefined Kapiolani Stop on the Koko Head end (see S-5), and goes on to disclose that portions of the Kakaako Mauka and Makai branches on Richards Street have been realigned to address resident input (see S-6), as objections to using Richards Street makai of South King Street for the BRT route led to requests for the City to explore alternate alignments (see 2-29). Further, the Director of the City Department of Transportation Services, Cheryl Soon, clearly stated at the McCully/Moiliili Neighborhood Board's regular meeting of February 7, 2002, that the planning process will have as many meetings as needed (see Neighborhood Board #8 Meeting Minutes, page 5).

However, although specific concerns were stated in responses to the BRT MIS/DEIS regarding the Kapiolani end of the proposed BRT route as described, there has been no further opportunity for resident community input regarding the impacts of the proposed In-Town BRT corridor on this area, and more specifically Kapiolani Park. In fact, interested and affected organizations and individuals, including but not limited to the Kapiolani Park Preservation Society and the Diamond Head/Kapiolani/St. Louis Heights Neighborhood Board, have been neither directly informed of nor invited to sporadic Waikiki workshops to address the Waikiki segment of the In-Town BRT route.

Response: The proposed BRT project will not affect Kapiolani Park. DTS has coordinated with the Kapiolani Park Preservation Society and attended and responded to questions at many Diamond Head/Kapiolani/St. Louis Heights Neighborhood Board meetings.

107. Further, the Diamond Head/Kapiolani/St. Louis Heights Neighborhood Board was informed by City Councilmember Beinum at their April 11, 2002, regular meeting that there would be no SDEIS published on the In-Town BRT lane relocations, commercial loading zone changes, or any other changes to the Waikiki/Kapiolani portion of the proposal.

**Response:** The MISDEIS, SDEIS and FEIS reflect the effects associated with the project including any proposed lane configuration or commercial loading zone changes, etc.

108. *Therefore, desired community input on the potential significant impacts of the In-Town BRT on the Kapahulu area has been virtually precluded. Had the few Waikōō workshops occurred openly and informally, the concern about the potential significant impact on one of the area's most prominent historic sites along the proposed In-Town BRT route, Kapiolani Park, could have been brought forth.*

**Response:** The proposed BRT project will not affect Kapiolani Park. It will provide another transportation means to access the park.

109. *The SDEIS states that priority treatment for buses would involve minimal physical change, resulting in little or no visual impact to the existing landscape, regardless of lane use (see S-10). However, the SDEIS does not address the visual and viewplane impact on the traditional Hawaiian Sense of Place for residents and visitors alike experiencing the 51 futuristic, 60-foot-long double tram cars, 15 feet in height, as they stop in front of Historic Iolani Palace, cut along the significant Waikōō ocean shoreline viewplane, and intrude on historic Kapiolani Park landscape and significant Diamond Head resource viewplanes every 3 minutes.*

**Response:** As stated above, the BRT vehicles will be about ten and a half feet tall, not 15 feet. The look of the vehicles will be selected with community input. We do not understand how the impact described is any different than what currently occurs today with city buses, which pass through the Capitol District and Waikōō, near the shoreline.

110. *In addition, a tree survey and impact analysis for the In-Town BRT identified 144 trees that would be impacted by the project, of which 36 trees are classified as "notable", i.e., important to the urban landscape character, either individually or grouped to comprise a recognized and important element of the visual landscape (see S-11). According to the SDEIS, a certified arborist determined that 25 trees were too old or otherwise unsuitable for successful transplantation, and these trees would be replaced elsewhere with City stock trees. Further, removing and relocating ten (10) "notable" mature monkeypod trees from Kapiolani Boulevard (see S-14) would unquestionably have a grave effect and significant impact on the visual character and integrity of this area.*

**Response:** Monkeypod trees on Kapiolani Boulevard that will be affected by the proposed action will be relocated on-site, meaning they will be moved with minimal trimming and replanted in the same vicinity. Therefore, the visual character or integrity of this area will be maintained.

111. *The SDEIS states that a financial plan analysis, conducted by consultants hired by the City administration, assessed the city's ability to operate and maintain the proposed transportation network, and financial plans were developed based on two key assumptions among others: 1) that the full scope of each alternative must be completed without raising taxes, and 2) that the City's high bond rating must not be affected. The SDEIS further states that funding would be sought from multiple federal and local sources, and that City general obligation bonds would be used to fund up to 47% of the cost of the project and additional general obligation bonds would be issued to fund early construction activities in anticipation of later federal or State reimbursement (see S-15, 16 and 16).*

**Response:** \$40 million in State Highway Funds were removed as a capital revenue source and replaced with a combination of City GO Bond proceeds and FTA Section 5309 New Start grant funds. The increase of GO Bonds did not affect the City's capacity to fund the project, nor the City's future bond rating position.

112. *However, the above assumptions did not factor in the fact that the State has now declined to assist with the financing of the proposed project. This would appear to place an undue burdensome risk on the City's taxpayers and have the potential to jeopardize the City's bond rating.*

**Response:** See response to comment #111.

113. *The SDEIS defines the local funding for this \$1 billion project as \$285.9 million in general obligation bonds with interest and principal debt service paid by the local taxpayer, and the City highway fund for \$35.7 million, with the remainder of the \$904 million -- \$422.3 million and \$160 million -- coming from Federal Transit Administration and Federal Highway Funds, respectively. For FY 2002 - 2010, the average total annual impact on the City taxpayer general fund (69%), and highway fund (11%) required for capital cost and operating cost subsidy would be: \$107.8 million for the regional BRT system (see S-18).*

**Response:** The FEIS financial plan demonstrates that the project can be financed without the use of State highway funds. Adjustments were made in phasing, revenue sources, and the amounts used from the various revenue sources in any given year. The changes made in the SDEIS and the FEIS demonstrates, in part, how the basic financial plan can be adjusted to account for changing conditions.

114. *The SDEIS further states that based on the above assumptions, major existing revenue sources were examined and costs were then compared to the revenue projected to be available from these sources over the nine-year period of FY 2002 to FY 2010, the period within which all of the capital improvements except vehicle replacements would be implemented. However, this could be somewhat misleading, as the SDEIS states that construction schedules would be phased according to the availability of funds and would be flexibly adjusted according to fiscal considerations (see S-16). Therefore, considering the question of availability of funds and the phasing of flexible construction schedules this may mean that in view of the State withdrawing from the project, construction may be delayed indefinitely or discontinued permanently with any shortage of local funds.*

**Response:** See response to comment #113.

115. *Further, because the SDEIS addresses the cost of the proposed project in terms of 1998 dollars, the SDEIS appears to be highly misleading and without regard for the total debt cost and capital expense outlay over the implementation phase of the proposed project.*

**Response:** The cost of the proposed project in the FEIS uses 2002 dollars, inflated to Year of Expenditure dollars in each of the project years.

116. *The SDEIS states that capital costs for the regional BRT from Kapiolani to Kapahulu would cost \$904 million over nine years from FY 2002 to FY 2010, and that construction of the In-Town BRT transit lanes and acquisition of a fleet of 51 high capacity electric vehicles would cost \$345.5*

million with the balance of the capital costs to expand existing maintenance facilities and increase the transit fleet to 730 buses. The SDEIS further states that the capital costs for the In-Town BRT would be \$388.2 million from FY 2002 to FY 2025 (see S-17 and S-6).

However, Table 2.3-1 on 2-26 of the SDEIS lists a different set of numbers -- \$355.64 million for the In-Town BRT with a total cost of \$999.5 million, and notes this increase includes \$32.8 million for the addition of the Kakaako Makai branch and the Pensacola St. realignment, \$8.3 million for 13 additional In-Town BRT vehicles, and \$14.5 million for BRT alternative refinements.

In any event, the question remains centered on the mixed juggling of the numbers and whether these costs are limited to capital costs only, while annual inflation factors from the 1998 level through 2025 and debt service, including City taxpayer repayment of principal and interest, should be more properly disclosed as well.

**Response:** While the numbers have changed from the SDEIS to the FEIS due to further refinements to the project, you are misstating the SDEIS. On page S-17 it states that the capital cost of the entire "Refined BRT" (not the "Regional BRT" as you incorrectly indicate) is projected to be \$904 million in YOE dollars for the period 2002-2010. It also states that the cost of the In-Town BRT portion in YOE for this same period would be \$345.5 million.

The reason for the difference with Table 2.3-1 is that Table 2.3-1 reflects capital costs for the period 2002-2025 expressed in 1998 dollars. So there is a difference in the time frames and in the use of present and future dollars.

Debt service for the bonded portion of these capital costs is reflected in the cash flow analyses in Appendix E of the SDEIS and FEIS.

117. The non-federal capital cost of the proposed BRT project is to be financed through City taxpayer-reimbursed General Obligation bonds. The SDEIS states: "BRT would result in over 18% WORK TRIPS on transit ... and 14.7% with no-build" (see S-8). This is only a 3.3% increase in work trips at a cost of nearly \$1 billion in 1998 dollars, not including debt service.

**Response:** The nearly \$1 billion includes the normal replacement of the entire bus fleet over a 23 year period. This roughly \$440 million in capital costs would be needed whether the BRT system were built or not. More to the point, however, is that the cost of improving the transit system to attract additional riders out of their autos is less than half of what the cost would be to widen the roads to carry these same people if they remained in their autos. (See Chapter 2, Section 2.6.1 of the FEIS for the Highway Alternative).

118. Further, the operations and maintenance cost is projected at a whopping 71% to be subsidized by City taxpayers to supplement collected fares (see 6-1). According to the SDEIS, operations and maintenance subsidies for the regional BRT in 1998 dollars would be \$133 million in FY 2025, and the total estimated operating cost for the regional BRT system would be \$188.4 million in FY 2010 (see S-6, 17 and 18). Thus, all but at least \$55.4 million of the operations and maintenance costs of the regional BRT system will be subsidized by the Honolulu taxpayer in FY 2025 -- a 71% subsidy to increase work trips only 3.3%. Yet, Councilmember Baum's Resolution adopted by the City Council last year places a 33% ceiling on any transit subsidy (see Exhibit B, attached).

**Response:** The FEIS shows a 67 percent public operating subsidy.

In July 2001, the City Council adopted a policy that requires the bus farebox recovery ratio to not fall below 27 percent nor exceed 33 percent. The 33 percent ceiling is a ceiling on the amount of the bus fare, not a ceiling on the transit subsidy. This describes the Council's policy of the appropriate level of public support for the ongoing operations and maintenance of a public transportation system. The FEIS financial analysis assumes a 27 percent farebox recovery ratio.

119. Together, as formulated in the SDEIS, this is going to cost the City taxpayers annually \$83 million in capital costs and \$133 million in operations subsidy, with In-Town fares only covering 4% of the additional operations cost. This capital and operation cost totals \$216 million City taxpayer dollars paid annually as of 2010, with undefined debt service and inflation costs.

The SDEIS defines the local funding for this \$1 billion project as \$285.9 million in general obligation bonds with interest and principal debt service paid by the local taxpayer, and the City highway fund for \$35.7 million, with the remainder of the \$904 million capital investment (in 1998 dollars) -- \$422.3 million and \$160 million -- coming from Federal Transit Administration and Federal Highway Funds, respectively (see S-18). Here the City anticipates a 64% : 36% funding ratio for funding from federal and local sources, respectively. However, federal funding practices indicate that high-end transportation projects in the \$1 billion range, such as that proposed for Honolulu, would only be funded at a 50%:50% matching fund ratio, as the more costly the project, the less federal funding match awarded. Further, according to national experts in this area, this would be allocated at only \$100 million annually for five years to help ensure accountability.

**Response:** You are mixing costs for the entire island-wide transit system with fare revenue for only the In-Town BRT. The correct numbers for the In-Town BRT that were in the SDEIS are an annual O&M cost of \$20.5 million in year 2010 in YOE dollars with annual fare revenue of \$5.13 million.

The financial plan presented in Chapter 6 shows that a combination of funding sources will be used. Federal sources of capital funding will be FTA formula and grant funds, and FHWA highway program funds. The federal portion of FTA New Starts funds can be as high as 80 percent, but are typically 50 percent shared with the local entity. The Refined LPA assumes a 50 percent federal share for these funds. FHWA funds are 80 percent federally funded for projects on the interstate highway system and 80 percent for other eligible highways. Since some portions of the project will be funded with FTA funds and some with FHWA funds the average federal share is projected to be about 65 percent.

120. Moreover, current indications are that the Congressional re-authorization dollar amount is going to be controversial this year in a battle of how much will be inserted in the transportation bill. In addition, the Federal Transportation Administration has confirmed that the State has withdrawn support of the Honolulu BRT project proposal and is no longer part of the BRT financing equation.

**Response:** This is factually incorrect. The State has not withdrawn support for the BRT project. To the contrary, OMPO which is the agency responsible for allocating federal funding for transportation projects has included funding for the Refined LPA in its updated long-range plan. The OMPO Policy Committee which makes these decisions is primarily comprised of State legislators and City Council members. What has been agreed to at OMPO is that the state will not be supplying the local match for some project elements that was assumed in the DEIS (this amounted to \$40 million total). The City instead will supply the match, which is what was shown in the SDEIS and is now shown in the FEIS.

121. Yet, the City administration "anticipates" federal and state funding reimbursement "later", and the City administration "assumes" that the \$ billion-plus transportation project will be completed without raising taxes, and that the City's bond rating will not be affected (see S-16 and S-19).

**Response:** While the conclusions stated are correct, they are not the City administration's conclusions, they are the conclusions of extensive financial analyses, the results of which are presented in Chapter 6 of the FEIS.

122. Does the City and County of Honolulu have the financial capacity to afford this? Under the City's current fragile financial condition it would appear that this would place an undue burdensome weight on Honolulu City taxpayers, as well as negatively affect the City's current bond rating to the point where such rating agencies as Moody's, Standard & Poor's, and Fitch's could downgrade City bonds to junk-bond rating, causing financing costs to soar even higher for City taxpayers. Rather than paying down the debt load, the present City administration advocates restructuring those ultimately responsible for satisfying both principal and interest paid on capital improvement the City's debt load by creating more debt to pay off existing debt, spinning the City's taxpayers, general obligation bonds, into an ever deeper fiscal black hole. Therefore, the In-Town portion of the proposed BRT system, with all its inherent problems and impacts on the urban core, will be much, much more than a bad investment for City taxpayers - it will become an unwieldy fiscal burden on the citizens of Honolulu.

**Response:** As shown in the table below, the additional City revenues required to supplement debt service payments from the Highway Fund comprise no more than 0.75% of the City's Operating Budget in any one year. This amount is thus quite modest in comparison to the total resources the City makes available for its annual operating costs.

ESTIMATED ADDITIONAL CITY FUNDS REQUIRED FOR DEBT SERVICE FOR REPEATED LPA

	Operating Budget	Additional Debt Svc over Highway Fund	Percent of Budget
FY 2002	854,374,810	0	0.00%
FY 2003	894,000,000	0	0.00%
FY 2004	1,014,500,000	0	0.00%
FY 2005	1,044,200,000	0	0.00%
FY 2006	1,103,700,000	88,252	0.01%
FY 2007	1,167,200,000	3,078,072	0.26%
FY 2008	1,212,100,000	6,432,854	0.53%
FY 2009	1,241,978,500	6,672,518	0.53%
FY 2010	1,264,139,678	9,157,805	0.73%
FY 2011	1,282,722,419	9,592,053	0.75%
FY 2012	1,297,953,813	10,298,693	0.79%
FY 2013	1,310,207,213	10,811,355	0.82%
FY 2014	1,319,484,813	11,318,187	0.86%
FY 2015	1,326,821,154	11,810,402	0.89%
FY 2016	1,332,218,683	12,298,158	0.92%
FY 2017	1,336,678,509	12,780,152	0.95%
FY 2018	1,340,198,537	13,256,152	0.99%
FY 2019	1,342,778,054	13,726,152	1.02%
FY 2020	1,344,413,534	14,190,152	1.05%
FY 2021	1,345,107,010	14,648,152	1.09%
FY 2022	1,344,858,510	15,100,152	1.12%
FY 2023	1,343,677,010	15,546,152	1.16%
FY 2024	1,341,562,510	15,987,152	1.19%
FY 2025	1,338,514,010	16,422,152	1.23%

**Notes:**  
Operating Budget estimates for 2002 - 2013 provided by City Finance Department.  
Operating Budget estimates for 2014 - 2025 assume the Operating Budget will increase annually at the compound annual growth rate demonstrated over the 2002-2013 period (2.92%).  
Additional Debt Service over Highway Fund is the funding required in addition to the maximum level of funds projected to be available for debt service from the Highway Fund, assuming a 0.5% annual growth of the Highway Fund.

123. The proposed In-Town BRT is a very restrictive undertaking. It restricts the free flow of traffic. It restricts the free enterprise of private carriers by threatening their livelihood. It restricts open discussion of reasonable alternatives for REAL traffic congestion solutions. And last, but certainly not least, it restricts advancement of the quality of life in our urban area by overburdening the City taxpayers with unwieldy capital and operations costs.

**Response:** Comment noted. It is a statement of opinion. The BRT project will provide Oahu residents with another transportation option and as a result has the potential to enhance the quality of life.

124. What does the In-Town BRT really mean? It means compounded congestion on main thoroughfares by 60-foot trams every 2 to 4 minutes that eat up traffic lanes. In spite of the City administration's claims, this will not get cars off the road. It will cause cars to circumnavigate the main traffic thoroughfares into surrounding communities and neighborhoods, increasing congestion, noise and pollution in residential areas. The construction jobs are temporary - but the impact on our streets, in our neighborhoods, and our livelihoods will be here to stay for several generations if the In-Town BRT is allowed to roll forward.

**Response:** Comment noted. It is a statement of opinion without substantiation.

Ms. Michelle Spalding Matson  
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November 13, 2002

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DEPUTY DIRECTOR

TPD02-00584

November 13, 2002

Mr. David Maxwell  
P.O. Box 15849  
Honolulu, Hawaii 96830-5849

Dear Mr. Maxwell:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. *I'd like to talk about the economic impact. Our country had eight years of prosperity, and now I think we're going to have four years of disparity.*

Response: Comment noted.

2. *As an unemployed person, I will not be paying taxes until I get a job. So I think you guys should think before you ink.*

Response: Comment noted.

3. *And also, technology changes every day. I think, in the next ten years, the bus system that we have now will be some kind of different bus system.*

Response: We concur.

4. *And once you start this project, you won't be able to change it. That's all I had to say.*

Response: The project has been refined as a result of our community involvement activities. In addition, one of the benefits of BRT is that the routing can be revised, if required without a major disruption to service. This differs from light rail, which is stationary and the rails, electric source, etc. would result in major disruptions if changes were required.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

125. *The In-Town BRT is the wrong system for Honolulu's contained urban area. The solution to Oahu's urban traffic gridlock is over the longest distance to serve the greatest number of people in the least amount of time. The transportation proposal should be focusing instead solely upon addressing Oahu's transportation needs between Keolu, the "Secondary Urban Center," and Honolulu's urban core (see S-3). Ironically, what is most practical and less costly for the higher density in-town Honolulu Urban Core surrounded by smaller mountains, valley and shoreline communities and business districts, is a combination of far more accessible, flexible and convenient public and private circulator and express routes - that which was rejected by the City administration in favor of the In-Town BRT.*

Response: It was the City Council and OMPO Policy Committee that selected the BRT as the LPA, not the City Administration.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

4/20/02

APR 20 2002

Ms. Cheryl Soon, Director  
Department of Transportation Services  
City & County of Honolulu

Dear Ms. Soon,

I am in support of the Bus Rapid Transit program all the way!

The BRT is a good start for introducing a mass transit program in Hawaii. There are many of us that rely on public transportation and welcome improvements to our existing Bus system, and I think this is definitely the way to go.

Thank you for your insight.

*Laurie McCallum*  
Laurie McCallum

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU  
840 SOUTH KING STREET, 2ND FLOOR • HONOLULU, HAWAII 96813  
TELEPHONE: (808) 521-4111 • FAX: (808) 521-4130 • INTERNET: www.cc.honolulu.gov



JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE W. EDGAR WITANATO  
VICE DIRECTOR  
TPD02-00596

November 12, 2002

Ms. Laurie McCallum

Subject: Primary Corridor Transportation Project

This is in response to the comments in your April 20, 2002 letter regarding the Supplemental Draft Environmental Impact Statement (SDEIS).

1. *I am in support of the Bus Rapid Transit program all the way!*

Response: Thank you for supporting the project.

2. *The BRT is a good start for introducing a mass transit program in Hawaii. There are many of us that rely on public transportation and welcome improvements to our existing Bus system, and I think this is definitely the way to go.*

Response: We appreciate you attending the public hearing and supporting the project.

Thank you for your interest in this project.

Sincerely,

*Cheryl D. Soon*

CHERYL D. SOON  
Director



**PRIMARY CORRIDOR TRANSPORTATION PROJECT**  
 Island of Oahu, Hawaii  
**SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT (SDEIS)**

The information you provide on this form will help the City & County of Honolulu and the Federal Transit Administration in the future planning of the Primary Corridor Transportation Project. We appreciate any comment you may have. Comments must be postmarked or received by May 7, 2002.

Name: Helen McCune  
 Representing: myself  
 Address: 2464 PRINCE EDWARD

Please make any comments below:

Let's have a bus that goes all the way from Waikiki to Waialae Ave. The trolley costs \$ and doesn't take passes. Then we can patronize those businesses and also have an alternate route to Kahala Mall.

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
 650 SOUTH KING STREET, 3RD FLOOR  
 HONOLULU, HAWAII 96813  
 Phone: (808) 523-4529 • Fax: (808) 523-1730 • Internet: www.cc.honolulu.hi.us



JEREMY HARRIS  
 MAYOR

CHERYL D. SOON  
 DIRECTOR

GEORGE "KEOKI" MIYAMOTO  
 DEPUTY DIRECTOR

TPD02-00596

November 13, 2002

Ms. Helen McCune  
 2464 Prince Edward  
 Honolulu, Hawaii 96815

Dear Ms. McCune:

Subject: Primary Corridor Transportation Project

This responds to your oral testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

Let's have a bus that goes all the way from Waikiki to Waialae Ave. The trolley costs \$ and doesn't take passes. Then we can patronize those businesses and also have an alternate route to Kahala Mall.

Response: This is a comment about the present bus system and not the proposed project.

We appreciate your interest in the project.

Sincerely,

*Cheryl D. Soon*

CHERYL D. SOON  
 Director



DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE NEOKI'U'U'AMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD02-00597

Mr. Ed McInerney  
1878B 10<sup>th</sup> Avenue  
Honolulu, Hawaii 96816

Dear Mr. McInerney:

Subject: Primary Corridor Transportation Project

This responds to your October 26, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. *In the case of the In-Town BRT system and the proposed use of electrified vehicles on exclusive transitory lanes along existing streets, I am genuinely concerned as to the effect this may have on the traffic patterns in those areas.*

Response: Chapter 4 of the MIS/DEIS and FEIS address anticipated transportation impacts.

2. *In addition, during the construction phase of the project, what will the impact be on businesses and other transportation providers along the proposed route.*

Response: Section 5.12 of the MIS/DEIS and FEIS discuss the impacts of construction activities.

3. *In high density areas such as Waikiki, what will be the effect on both freight and passenger loading zones and their impact on those industries?*

Response: In the public outreach for the project, the City established a Working Group (WG) for the Waikiki area which included representatives from hotels, retail and service industries, commercial passenger and freight carriers, and residents. One topic of discussion was the proposed BRT lane configurations for the various segments of the In-Town BRT in Waikiki. In addition, a detailed study of passenger and freight loading activities was performed and reviewed with the Waikiki WG. Discussions with this working group led to revisions in the

RECEIVED  
OCT 27 3 48 PM '00  
CITY OF  
HONOLULU, HI

October 26, 2000

TESTIMONY BEFORE THE CITY AND COUNTY OF HONOLULU  
COUNCIL COMMITTEE ON TRANSPORTATION ON THE PRIMARY  
CORRIDOR TRANSPORTATION PROJECT

Thank you Chairman Bainum and Committee Members. I am Ed McInerney, a concerned private citizen.

While I don't believe anyone in this room would agree that the No-Build alternative offered in the MIS/DEIS Summary is a viable solution, care must be taken in giving consideration to the other alternatives.

My primary concern this evening, has to do with the proposed implementation of the Transportation System Management (TSM) and the Bus Rapid Transit (BRT) concepts and their effect.

In the case of the in-town BRT system and the proposed use of electrified vehicles on exclusive transitory lanes along existing streets, I am genuinely concerned as to the effect this may have on the traffic patterns in those areas.

In addition, during the construction phase of the project, what will the impact be on businesses and other transportation providers along the proposed route. In high density areas such as Waikiki, what will be the effect on both freight and passenger loading zones and their impact on those industries? Will emergency service such as Police, fire and Ambulances be affected in these areas?

While any change can sometimes be disruptive, thought must be given and sensible solutions sought out.

In conclusion, I am not opposed to improvements to Oahu's Transit System, but can only hope that any of the alternatives you select will help to enhance our existing award winning transportation system.

Mr. Ed McInerney  
Page 2  
November 13, 2002

proposed project that resulted in no appreciable loss of on-street loading space along the streets affected by the BRT. This was achieved by allowing freight carriers to use the BRT shared lane during legal delivery hours (10 p.m. to 9 a.m. on Kalakaua Avenue and 10 p.m. to 7:30 a.m. on Kuhio Avenue); the BRT would simply pass around a stopped loading truck by using the adjacent traffic lane.

4. *Will emergency service such as Police, fire and Ambulances be affected in these areas?*

Response: On the contrary, the proposed network of exclusive and semi-exclusive BRT lanes will greatly enhance emergency vehicle times by providing an uncongested lane for such vehicles to reach incident locations. With proper emergency traffic signal preemptions in place, BRT vehicles will be able to move out of the exclusive lane at the nearest intersection to allow emergency vehicles to pass through the intersection unimpeded by either left turning or cross street traffic.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

The Honorable Jon Yoshimura, Chair,  
and Members of the City Council,  
City and County of Honolulu NOV 13 5 26 PM '00  
Honolulu, Hawaii 96813

November 13, 2000

Dear Chair Yoshimura and Councilmembers:  
CITY CLERK

I honorably request that you approve "Resolution 00-249."

Therefore, it's imperative that the "City and County of Honolulu" move forward in this positive manner to address the traffic problems that we now face. I've personally attended most of the "Community" meetings regarding this issue and fully support this project.

Hence, I still wonder though, how do we as a community address the number of new vehicles sold/purchase each year (20% increase in 2000, 33% increase in 1999, etc)? I strongly endorse the mobility concepts forwarded by the City Administration.

We must continue to plan and work for the future population.

Sincerely,



Kit McHannan  
P.O. Box 15465  
Honolulu, HI 96830

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU  
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CHERYL D. SOON  
DIRECTOR  
GEORGE W. MOORE, MAYOR  
COUNTY DIRECTOR

TPD02-00608

November 13, 2002

Mr. Kii McMannan  
P. O. Box 15465  
Honolulu, Hawaii 96830

Dear Mr. McMannan:

Subject: Primary Corridor Transportation Project

This is in response to your November 13, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. I honorably request that you approve "Resolution 00-249." Therefore, it's imperative that the "City and County of Honolulu" move forward in this positive manner to address the traffic problems that we now face. I've personally attended most of the "Community" meetings regarding this issue and fully support this project.

Response: Thank you for supporting the project.

2. Hence, I still wonder though, how do we as a community address the number of new vehicles sold/purchased each year (20% increase in 2000, 33% increased in 1999, etc.)? I strongly endorse the mobility concepts forwarded by the City Administration.

Response: Comment noted.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

TP5102-1782

April 29, 2002

Department of Transportation  
Honolulu  
650 So. King Street, 3rd floor  
Honolulu, Hawaii 96813

MAY 6 2002

Attorney: Cheryl Soon, Director  
Dear Mr. Soon;

I would like to add my opposition to the present Bus Rapid Transit project.

My reasons are many but chief among them is the fact that we have a very good bus system right now and only need, perhaps, a few additional lanes in cutting areas. The millions of dollars necessary for the program would be better used elsewhere.

Thank you.

Yours Truly,

Mr. U. McManis

1777 Ala Moana, #326

Honolulu, Hi. 96815

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
463 SOUTH KING STREET, 3RD FLOOR  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE KEOKI MIYAMOTO  
DEPUTY DIRECTOR

2749 Rooke Avenue  
Honolulu, HI 96817

November 6, 2000

TPD5/02-01782R

November 13, 2002

Mrs. V. McWaters  
1777 Ala Moana Blvd. #326  
Honolulu, Hawaii 96815

Dear Mrs. McWaters:

Subject: Primary Corridor Transportation Project

This is in response to your April 29, 2002 letter regarding comments on the Supplemental Draft Environmental Impact Statement (MIS/DEIS).

1. *I would like to add my opposition to the present Bus Rapid Transit project.*

Response: Comment noted. No response required.

2. *My reasons are many but chief among them is the fact that we have a very good bus system right now and only need, perhaps, a few additional buses in outlying areas. The millions of dollars necessary for this proposal would be better used elsewhere.*

Response: Comment noted. No response required.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

Ms. Cheryl Soon  
Director  
City and County of Honolulu  
Department of Transportation Services  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813

Governor, State of Hawaii  
C/O Office of Environmental Quality Control  
235 South Beretania Street, Suite 702  
Honolulu, Hawaii 96813

Parsons Brinckerhoff Quade and Douglas, Inc.  
Pacific Tower, Suite 3000  
1001 Bishop Street  
Honolulu, Hawaii 96813

Ms. Donna Turchie  
Senior Transportation Representative  
Region IX  
Federal Transit Administration  
U.S. Department of Transportation  
201 Mission Street, Suite 2210  
San Francisco, California 94105-1839

Federal Highway Administration  
Hawaii Division  
Box 50206  
Honolulu, HI 96850

Oahu Metropolitan Planning Organization Policy Committee  
707 Richards Street, Suite 200  
Honolulu, Hawaii 96813

Subject: Primary Corridor Transportation Project Major Investment Study/Draft  
Environmental Impact Statement (MIS/DEIS)

These are my opinions: I do not presume to speak for anyone else.

#### THE PROPOSING AGENCY

1. I think that the Oahu Metropolitan Planning Organization (OMPO) should insist that the State DOT become a co-lead for preparation of the MIS/FEIS. Designating the DOT as a co-lead will help with State "buy-in", improve MIS/FEIS cost estimates and technical analysis, and make the City and State cooperate in setting realistic priorities.

#### THE COST ISSUE

2. As proposed in the MIS/DEIS, so much FHWA, DOT, and City funds would be committed for BRT development that it would be necessary to postpone most other desirable freeway, arterial, and bikeway improvements. In my opinion, OMPO needs to identify ways to reduce the cost of the BRT proposal and to spread out costs over a longer period.

To allow OMPO to make informed decisions about the relative costs and benefits of proposed new Regional BRT freeway access ramps and parking facilities, I request that the MIS/FEIS:

- estimate BRT use in 2010, and in 2025, of the proposed H-1 Kapolei ramp, Kunia ramp, Radford ramp, Kaonohi ramp, and Middle Street ramp if the entire Regional BRT were completed as proposed.
- estimate what bus ridership would be lost and/or what additional person hours of travel delay would result in 2010 from postponing construction of the proposed H-1 Kapolei ramp, or the proposed Kunia ramp, or the proposed Radford ramp, or the proposed Kaonohi ramp, or all four proposed ramps, or the proposed Middle Street ramp.
- estimate how much construction cost (including ancillary improvements) could be deferred by postponing construction of the proposed H-1 Kapolei ramp, or the proposed Kunia ramp, or the proposed Radford ramp, or the proposed Kaonohi ramp, or the proposed Middle Street ramp.
- estimate what bus ridership would be lost and what construction cost could be deferred by postponing construction of each separate proposed new BRT parking facility.

#### THE SUBSIDY ISSUE

3. I think that OMPO needs to get a better understanding -- and set reasonable limits -- on public subsidies to encourage City bus ridership. OMPO should not allow either FHWA or FTA funds to be used for unreasonable subsidies. Is it worth spending \$30 million of public funds to build a special BRT access ramp at Kapolei to encourage a few hundred more leeward Oahu commuters to ride the bus during rush-hour traffic? Is it worth

spending \$20,000 of public funds to build a park-and-ride stall in a Middle Street parking garage, and offer free parking, to encourage one more leeward Oahu commuter to ride the bus during rush-hour traffic? Is it worth spending \$1,200/year of public funds for subsidies to encourage one more leeward Oahu commuter to ride the bus during rush-hour traffic? (Excluding capital costs, taking fare revenues into account, average City commuter express bus operating subsidies already exceed \$5.50/day per round-trip rider. Unfortunately, this amounts to more than \$1,200/year/rider.)

#### THE SHORT TERM WHO IS BETTER OFF/WHO IS WORSE OFF ISSUE

4. I think the MIS/DEIS needs to disclose how many bus riders will be better off and how many drivers will be worse off after completion of the In-Town BRT in 2005. I also think the MIS/DEIS needs to disclose how completion of the In-Town BRT will impact total vehicle hours of traffic delay in 2005 and total persons hours of travel delay in 2005. There is no question that a bus on an exclusive transit right-of-way (ROW) would not be slowed by traffic congestion. However, consider the impact on peak eastbound morning traffic approaching Middle Street in 2005 when an eastbound traffic lane is removed from Dillingham Boulevard and converted to BRT use. Or, consider the impact on peak eastbound afternoon traffic approaching Piikoi Street in 2005 when eastbound lanes of both Kapiolani and Ala Moana Boulevards have been converted to BRT use.

#### THE LONG TERM VIEW

5. Over the long term, if traffic lanes are taken away from a highly congested roadway network, I think that drivers will alter their behavior so that there is no increase in peak period traffic delay. Contrary to the 2025 projections in the MIS/DEIS, I do not believe that taking traffic lanes away from cars to establish a BRT system will ever actually reduce peak period traffic delay. On the other hand, when traffic congestion lasts for hours, and there is a lot of latent travel demand, a good BRT system can significantly increase peak period person throughput and significantly reduce peak period travel delay for bus riders. That's why I support the concept of an exclusive, continuous In-Town BRT ROW.
6. Over the long term, it is bad planning for the MIS/DEIS to propose that the BRT share traffic lanes with cars on Kapiolani Boulevard between Atkinson Drive and University Avenue. MIS/DEIS traffic projections clearly show that any part of the In-Town BRT which shares arterial traffic lanes with cars will end up mirrored in peak period traffic congestion. It is not essential that the BRT route be located on Kapiolani Boulevard, or that the BRT route extend all the way to UH Manoa. However, I think it is essential for the MIS/FEIS to propose a continuous, exclusive In-Town BRT ROW which will prevent the BRT from being stuck in traffic.

THE ENVIRONMENTAL JUSTICE ISSUE

7. Apart from planning considerations, I do not think it complies with FTA standards for "environmental justice" to take traffic lanes away from cars (and ban left turns to/from driveways) along the low income Dillingham Boulevard BRT ROW but not to take traffic lanes away from cars along the more affluent Kapiolani Boulevard BRT ROW east of Atkinson Drive.

ISSUES POSED BY THE PROPOSED EASTBOUND MORNING H-1 ZIPPER-LANE EXTENSION

8. Deployment of the morning zipper-lane reduces the westbound H-1 to a single lane in part of the Waiawa Interchange. This is already causing a traffic jam for Ewa-bound traffic. The MIS/FEIS needs to include capacity analysis at all potential bottlenecks, including the Waiau and Waiawa Interchanges, to determine necessary modifications so that the Ewa-bound H-1 will have adequate capacity to handle projected 2025 traffic when two Ewa-bound lanes are removed by deployment of the morning zipper-lane. Because of the eastbound shoulder lane, the Kalauao screenline discussed in the MIS/DEIS may not be the most critical section for analysis.

9. The MIS/DEIS proposes a morning zipper-lane extension which will dump most eastbound HOV traffic onto a westbound freeway on-ramp from Nimitz Highway. Unfortunately, the MIS/DEIS totally fails to address management of morning contra-flow traffic on Nimitz Highway.

ISSUES POSED BY THE PROPOSED WESTBOUND AFTERNOON H-1 ZIPPER-LANE

10. In combination with DOT westbound H-1 widening from Kaonohi to the Pearl City off-ramp, the proposed MIS/DEIS afternoon zipper-lane could significantly reduce travel delay through two major afternoon freeway bottlenecks. One of these bottlenecks is caused by heavy traffic from the Pearl Harbor/Nimitz Highway on-ramp merging onto the Ewa-bound H-1; the other is caused by the drop in westbound H-1 lanes between the Halaawa Interchange and the Pearl City off-ramp.

11. The City's proposal for an afternoon zipper-lane justifies further study even if no BRT freeway access ramps are built. However, implementation will be complicated and costly. Issues that are not adequately addressed in the MIS/DEIS, and still need to be resolved, include:

- headlight glare problems resulting from removal of the permanent median barrier between Waiawa and Waiau Interchanges.
- necessary widening/strengthening of the existing eastbound shoulder lane (which was not designed for heavy use) and other required improvements which should be scheduled at the same time to reduce the inconvenience to motorists.

- appropriate widening/modification of the Waiawa interchange.
- capacity of the southbound H-2 and eastbound H-1 to handle projected 2025 traffic when two town-bound lanes are removed by deployment of the afternoon zipper-lane. Capacity analysis is needed at all potential bottlenecks, such as the Waiau Interchange, where there is no eastbound shoulder lane. Because of the eastbound shoulder lane, the Kalauao screenline discussed in the MIS/DEIS may not be the most critical section for analysis.

Thank you for the opportunity to express my opinions.

Sincerely,



D. Meller

A:DBRT

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**

660 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE "KEOKI" MIYAMOTO  
DEPUTY DIRECTOR

Mr. D. Meller  
Page 2  
November 13, 2002

TPD11/00-05418R

November 13, 2002

Mr. D. Meller  
2749 Rooke Avenue  
Honolulu, Hawaii 96817

Dear Mr. Meller:

Subject: Primary Corridor Transportation Project

This is in response to your November 6, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. I think that the Oahu Metropolitan Planning Organization (OMPO) should insist that the State DOT become a co-lead for preparation of the MIS/FEIS. Designating the DOT as a co-lead will help with State "buy-in", improve MIS/FEIS cost estimates and technical analysis, and make the City and State cooperate in setting realistic priorities.

Response: HDOT elected to be a cooperating agency, not a co-lead on the Primary Corridor Transportation Project (PCTP).

2. As proposed in the MIS/DEIS, so much FHWA, DOT, AND City funds would be committed for BRT development that it would be necessary to postpone most other desirable freeway arterial, and bikeway improvements. In my opinion, OMPO needs to identify ways to reduce the cost of the BRT proposal and to spread out costs over a longer period.

Response: Implementation of the PCTP does not preclude implementation of any of the most desired highway or bikeway projects as established by the OMPO Policy Committee, since these projects are included in the regional transportation plan (TOP 2025).

3. Estimate BRT use in 2010, and in 2025, of the proposed H-1 Kapolei ramp, Kuria ramp, Redford ramp, Kaonohi ramp, and Middle Street ramp if the entire Regional BRT were completed as proposed.

Response: Subsequent to the MIS/DEIS being published and based on comments received, the exclusive BRT ramps in Kapolei, Kuria, Kaonohi, Redford Drive, and Middle Street have been deleted from the project. Instead the BRT will use existing or HDOT proposed freeway ramps at Kapolei, North-South Road, and Middle Street. Priority treatments such as queue jump lanes are proposed at these ramps instead. Also, a new ramp for the exclusive use of BRT buses is proposed at Luapele Drive. This new ramp would serve the Aloha Stadium Transit Center/Park-and-Ride.

4. Estimate what bus ridership would be lost and/or what additional person hours of travel delay would result in 2010 from postponing construction of the proposed H-1 Kapolei ramp, or the proposed Kuria ramp, or the proposed Redford ramp, or the proposed Middle Street ramp, or all four proposed ramps, or the proposed Middle Street ramp.

Response: See response to comment #3.

5. Estimate how much construction cost (including ancillary improvements) could be deferred by postponing construction of the proposed H-1 Kapolei ramp, or the proposed Kuria ramp, or the proposed Redford ramp, or the proposed Kaonohi ramp, or the proposed Middle Street ramp.

Response: See response to comment #3. The aggregate savings of the ramp deletions is estimated at \$168 million in 2002 dollars.

6. Estimate what bus ridership would be lost and what construction cost could be deferred by postponing construction of each separate proposed new BRT parking facility.

Response: Each proposed park-and-ride is sized to meet the projected usage as determined from the travel demand forecasting models. Phasing of each facility is based on projected need and funding availability, such that the responses to the question raised are already built into the project.

7. I think that OMPO needs to get a better understanding -- and set reasonable limits -- on public subsidies to encourage City bus ridership. OMPO should not allow either FHWA or FTA funds to be used for unreasonable subsidies. Is it worth spending \$30 million public funds to build a special BRT access ramp at Kapolei to encourage a few hundred more leeward Oahu commuters to ride the bus during rush-hour traffic? Is it worth spending \$20,000 of public funds to build a park-and-ride stall in a Middle Street parking garage, and offer free parking, to encourage one more leeward Oahu commuter to ride the bus during rush-hour traffic? Is it worth spending \$1,200/year of public funds for subsidies to encourage one more leeward Oahu commuter to ride the bus during rush-hour traffic?

Response: The Honolulu City Council considered the costs and benefits of each of the alternatives in the MIS/DEIS and chose the BRT Alternative as the Locally Preferred Alternative. Likewise the Policy Committee of OMPO considered the costs and benefits of a wide range of projects and voted to include the BRT Alternative in the regional transportation plan for 2025.

8. I think the MIS/DEIS needs to disclose how many bus riders will be better off and how many drivers will be worse off after completion of the In-Town BRT in 2005.

Response: Chapter 4 of the FEIS includes information to compare the projected travel time delay within the urban core for the Refined LPA compared to the No-Build and TSM Alternatives for the year 2025. In addition, Chapter 4 includes a traffic analysis depicting level of service information for the No-Build, TSM and Refined LPA Alternatives. A year 2025 not 2005 traffic analysis is what is required for an EIS on a transit project.

9. I also think the MIS/DEIS needs to disclose how completion of the In-Town BRT will impact total vehicle hours of traffic delay in 2005 and total person hours of travel delay in 2005. There is no question that a bus on an exclusive transit right-of-way (ROW) would not be slowed by congestion. However, consider the impact on peak eastbound morning traffic approaching Middle Street in 2005 when an eastbound traffic lane is removed from Dillingham Boulevard and



converted to BRT use. Or, consider the impact on peak eastbound afternoon traffic approaching Piikoi Street in 2005 when eastbound lanes of both Kapiolani and Ala Moana Boulevards have been converted to BRT use.

**Response:** See response to comment #8.

10. Over the long term, if traffic lanes are taken away from a highly congested roadway network, I think that drivers will alter their behavior so that there is no increase in peak period traffic delay. Contrary to the 2025 projections in the MIS/FEIS, I do not believe that taking traffic lanes away from cars to establish a BRT system will ever actually reduce peak period traffic delay.

**Response:** Comment noted.

11. On the other hand, when traffic congestion lasts for hours, and there is a lot of latent travel demand, a good BRT system can significantly increase peak period person throughput and significantly reduce peak period travel delay for bus riders. That's why I support the concept of an exclusive, continuous In-Town BRT ROW.

**Response:** The FEIS findings are consistent with your stated position.

12. Over the long term, it is bad planning for the MIS/FEIS to propose that the BRT share traffic lanes with cars on Kapiolani Boulevard between Atkinson Drive and University Avenue. MIS/FEIS traffic projections clearly show that any part of the In-Town BRT which shares arterial traffic lanes with cars will end up mixed in peak period traffic congestion.

**Response:** The BRT Alternative is comprised of exclusive BRT, semi-exclusive BRT and mixed-use lanes. The BRT system strives to strike a balance between transit speed and impacts to general traffic. In segments where it was judged that roadway capacity was needed for general traffic and the BRT operation would not be significantly affected, exclusive lanes were replaced by either semi-exclusive or mixed-flow operation. In areas of high BRT ridership volumes, exclusive transit lanes were retained such as on Dillingham Boulevard and Hotel Street.

On the section of Kapiolani Boulevard that you mention, the trade-off between the impact to motorists of losing the contraflow lane would not be offset by the cumulative travel time savings to BRT riders. Therefore it is recommended that the BRT operate in mixed traffic along this section of Kapiolani Boulevard.

13. It is not essential that the BRT route be located on Kapiolani Boulevard, or that the BRT route extend all the way to UH Manoa. However, I think it is essential for the MIS/FEIS to propose a continuous, exclusive In-Town BRT ROW which will prevent the BRT from being struck in traffic.

**Response:** See response to comment #12. The BRT alignment was developed based on extensive community input and sound transit planning principles. Kapiolani Boulevard was chosen because there are many major travel generators to be served and large vacant sites located there on which the BRT could help shape transit oriented development. Having UH Manoa as the terminus of one of the In-Town BRT branches is consistent with a universal transit planning objective of trying to terminate a line at a major generator of transit trips. Achieving exclusive lanes all along the BRT alignment is not practical. About two-thirds of the alignment will be in exclusive or semi-exclusive (shared with right-turning vehicles) lanes. The remaining sections of the alignment will operate in mixed traffic. There are only a few of these mixed traffic sections where delays of any significance are expected, (along Alakea and Bishop Streets on the two

Waikiki branches, the section of Ala Moana Boulevard between Forrest Avenue and Aloha Tower Drive on the Kakaako Mauka branch, and the section of Kapiolani Boulevard between Atkinson Drive and University Avenue on the UH branch). It was not considered practical or necessary to make these sections exclusive or semi-exclusive.

14. Apart from planning considerations, I do not think it complies with FTA standards for "environmental justice" to take traffic lanes away from cars (and ban left turns (off from driveways) along the low income Dillingham Boulevard BRT ROW but not to take traffic lanes away from cars along the more affluent Kapiolani Boulevard BRT ROW east of Atkinson Drive.

**Response:** The highest ridership on the In-Town BRT is forecast to occur along Dillingham Boulevard. In fact, the reasons for proposing exclusive lanes on Dillingham Boulevard and mixed-use lanes on Kapiolani Boulevard are related to the relative transportation benefits and impacts totally unrelated to socioeconomic characteristics of the areas. The In-Town BRT is projected to serve four times the number of riders along Dillingham Boulevard compared to along Kapiolani Boulevard Koko Head of Atkinson Drive. This means that four times as many BRT users would be delayed if the Dillingham Boulevard exclusive lanes were abandoned. The reason priority lanes were not proposed along Kapiolani Boulevard Koko Head of Atkinson Drive was not just because of there being lower ridership but also to preserve the peak period contra-flow traffic operation.

15. The MIS/FEIS needs to include capacity analysis at all potential bottlenecks, including the Waiala and Waiala Interchanges, to determine necessary modifications so that the Ewa-bound H-1 will have adequate capacity to handle projected 2025 traffic when two Ewa-bound lanes are removed by deployment of the morning zipper lane. Because of the eastbound shoulder lane, the Kalaupapa screening discussed in the MIS/FEIS may not be the most critical section for analysis.

**Response:** The FEIS uses the Year 2025 Oahu Regional Transportation Plan (RTP) highway network as the base network for all future alternatives. This plan is a fiscally-constrained plan and was approved by the Oahu Metropolitan Organization (OMPO) Policy Committee on April 6, 2001. Included in this future highway network is a project to widen H-1 Freeway by one lane in the eastbound direction from Waiala Interchange to Halawa Interchange (project no. P-7) and a project to widen H-1 Freeway by one lane in the westbound direction from the Waimalu Viaduct to Pearl City off-ramp (project no. P-6). Also included were projects for H-1 widening in the westbound direction from Waiala to Waiala interchange (project no. P-43) and through the Waiala Interchange (project no. P-42). Table 4.4-1 in Chapter 4 of the FEIS shows that these improvements would allow both directions of H-1 Freeway to operate at LOS E during both the AM and PM peak hours with the zipper lane deployed.

16. The MIS/FEIS proposes a morning zipper-lane extension which will dump most eastbound HOV traffic onto a westbound freeway on-ramp from Nimitz Highway. Unfortunately, the MIS/FEIS totally fails to address management of morning contra-flow traffic on Nimitz Highway.

**Response:** The proposed zipper lane extension would directly serve the A.M. contraflow lane on Nimitz Highway that the HDOT is planning.

17. In combination with DOT westbound H-1 widening from Keonohi to the Pearl City off-ramp, the proposed MIS/FEIS afternoon zipper-lane could significantly reduce travel delay through two major afternoon freeway bottlenecks. One of these bottlenecks is caused by heavy traffic from the Pearl Harbor/Nimitz Highway on-ramp merging onto the Ewa-bound H-1; the other is caused by the drop in westbound H-1 lanes between the Halawa Interchange and the Pearl City off-ramp.

Mr. D. Miller  
Page 5  
November 13, 2002

**Response:** The project agrees with this statement.

18. The City's proposal for an afternoon zipper-lane justifies further study even if no BRT freeway access ramps are built. However, implementation will be complicated and costly.

**Response:** Comment noted.

19. Issues that are not adequately addressed in the MISDEIS, and still need to be resolved, include:  
1) headlight glare problems resulting from removal of the permanent median barrier between Waialua and Waiala Interchanges. 2) necessary widening/strengthening of the existing eastbound shoulder lane (which was not designed for heavy use) and other required improvements which should be scheduled at the same time to reduce the inconvenience to motorists. 3) appropriate widening/modification of the Waiala Interchange. 4) capacity of the southbound H-2 and eastbound H-1 to handle projected 2025 traffic when two town-bound lanes are removed by deployment of the afternoon zipper lane. Capacity analysis is needed at all potential bottlenecks, such as the Waiala Interchange, where there is no eastbound shoulder lane. Because of the eastbound shoulder lane, the Kalanooa screening discussed in the MISDEIS may not be the most critical section for analysis.

**Response:** 1) AASHTO Guidelines do not indicate that anti-glare treatment in this area is required. The guidelines state that, "Where there is no fixed-source lighting, headlight glare across medians or outer separations can be a nuisance, particularly where the highway has relatively sharp curves. Under these conditions, some form of anti-glare treatment should be considered as part of the median barrier installation, provided it does not act as a snow fence and create drifting problems." (A Policy on Geometric Design of Highways and Streets, AASHTO, 1994, pg. 368.) The location of concern has fixed-source lighting and does not have relatively sharp curves.

2) The shoulders will be reconstructed to carry protected traffic loads. H-1 will be widened from Waiala Interchange to Alea to accommodate the P.M. zipper lane (including the Waialua viaduct).  
3) Proposed improvements include adding a lane to H-1 WB to provide an option to H-1 WB and H-2 NB; widening of H-2 inbound ramp to 3 lanes + shoulders; widening of H-1 between the Pearl City viaduct and A.M. crossover to accommodate the P.M. crossover. 4) See response to comment #15.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

  
CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
639 SOUTH KING STREET, 3RD FLOOR  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE NEMOY MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002  
TPD02-00598

Mr. Joe Miller  
1801 Kalakaua Avenue  
Honolulu, Hawaii 96815

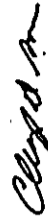
Dear Mr. Miller:

**Subject: Primary Corridor Transportation Project**

This responds to the comment you made on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS). Your testimony at the November 14, 2000 Special Transportation Committee Meeting supported the In-Town BRT as the Locally Preferred Alternative (LPA), with some concerns. Thank you for supporting the project.

We appreciate your interest in the project.

Sincerely,

  
CHERYL D. SOON  
Director

14 November 2000

Review Hearing

Subject: Draft Impact Environmental Statement  
Primary Corridor Transportation Project

Witness: J. T. Miller - Retired and a 36 year resident of Honolulu.

Only recently did I learn of the changes under study for the Honolulu Rapid Transit System. Upon studying the subject DIES, my primary concern is the BRT proposal for the segment of Richards Street from King Street to Ala Moana Blvd. This new extension down to Halekauwila Street is totally unworkable.

The segment in question, proceeding makai down Richards Street from King Street, presently a one way street that barely functions as it is during the work week. The Primary Corridor Transportation Project would convert this street to a two way street, with huge articulated, tractor type buses proceeding down the center of it, with two scant lanes on either side to facilitate the following:

King Street to Queen Street  
On the Diamond Head side:

The Main Downtown U. S. Post Office marshalling yard and loading docks, where over a hundred trucks arrive and depart daily, (except Saturday and Sunday).

On the Ewa side:

The 24 story City Bank Building: The main entrance and exit for six stories of parking for this building is directly across the street from the Post Office loading docks.

Queen Street to Halekauwila Street (one block):  
On the Ewa side:

Main entry and exit to six floors of resident and business parking for the 27 story Harbor Square Complex. Main entry red curb loading zone for the apartment complex, frequently used by emergency (fire trucks and ambulance) vehicles who have no compunctions about stopping traffic for indefinite periods of time.

Queen Street to Halekauwila Street (continued)

On the Diamond Head side:

Sole entry and exit to six floors of parking for 12 story Melim Building. Twenty feet matuka of that exit is the sole entry and exit for 5 stories of parking for the 12 story Oceanview Center.

Halekauwila Street to Punchbowl

Sole entry and exit to parking garage floors for the 12 story Hasako Bldg.

**ENVIRONMENTAL DISFIGUREMENT**

Directly in front of the Oceanview Center, the following flora and fauna will be ripped out and eliminated for the purpose of bus traffic:

- EIGHT (8) 30 foot palm trees
- Three (3) Plumeria trees
- A 60 ft. segment of curbed grass

Radical alterations required for turning radius of large rapid transit vehicles in this segment (and not addressed in the DEIS) are:

1. Narrowing of Nimitz Boulevard to two lanes at Richards Street area.
2. Closing of Halekauwila turnoff lane for Diamond Head bound traffic on Nimitz Blvd. for access to Kaakaako area, as Halekauwila will be BRT only from Richards to Punchbowl Street.

Possible Alternatives:

Because this particular segment of the BRT is ill conceived, the following alternatives are submitted.

The 'slip' segment of the Waikiki bound route could be routed:

1. Hotel Street to King Street to Punchbowl Street to Pohukaina St. where a Passenger Transit Stop could be located at the Federal Bldg.
2. Hotel Street to King Street to South Street to Pohukaina St.

Both of these possible alternatives have less congestive impact than that proposed.

RECEIVED  
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HONOLULU



DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
 MAYOR

CHERYL D. SOOHI  
 DIRECTOR

GEORGE "TEDDY" MIYAMOTO  
 DEPUTY DIRECTOR

TPD02-00589

November 13, 2002

Mr. J. T. Miller  
 Harbor Square Condo  
 700 Richard Street, #1909  
 Honolulu, Hawaii 96813

Dear Mr. Miller:

Subject: Primary Corridor Transportation Project

This is in response to your November 14, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. Only recently did I learn of the changes under study for the Honolulu Rapid Transit System. Upon studying the subject DEIS, my primary concern is the BRT proposal for the segment of Richards Street from King Street to Ala Moana Blvd. This new extension down to Halekuanuia Street is totally unworkable.

Response: Since the MIS/DEIS was published, the alignment has been changed to remove the BRT from Richards Street between South King Street and Halekuanuia. The revised alignment uses Alahea (meuke-bound) and Bishop (makai-bound) Streets instead.

2. The segment in question, proceeding makai down Richards Street from King Street, is presently a one way street that barely functions as it is during the work week. The Primary Corridor Transportation Project would convert this street to a two way street, with huge articulated, tractor type buses proceeding down the center of it, with two scant lanes on either side.

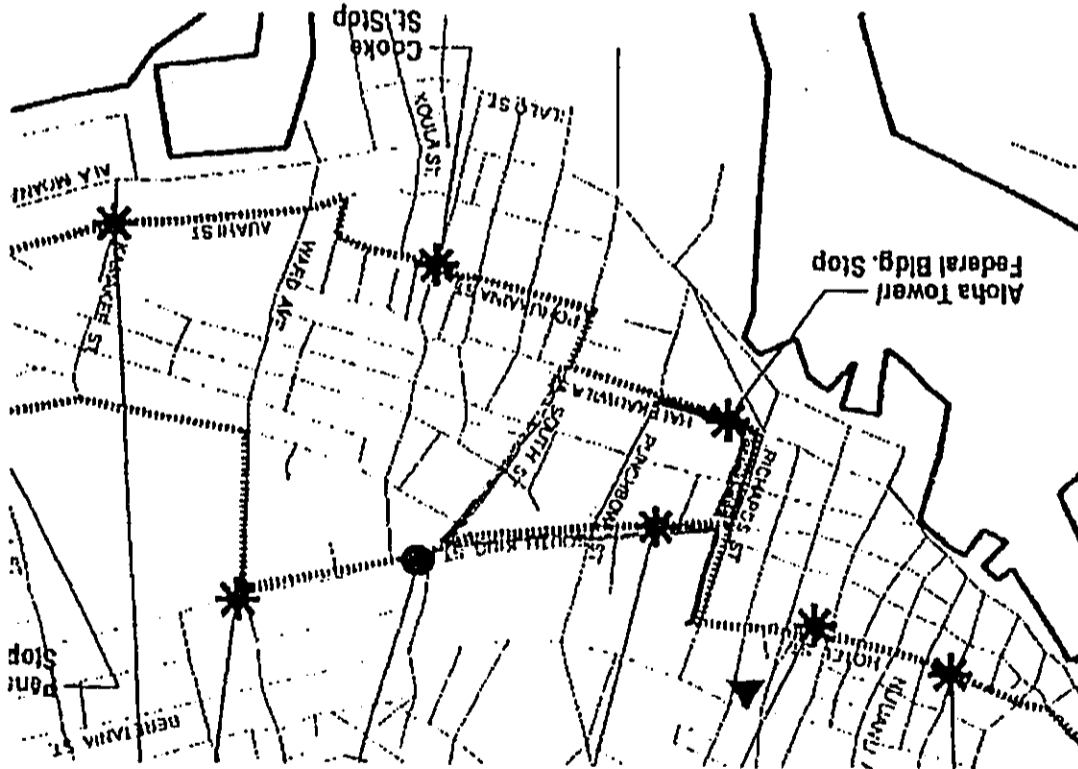
Response: See response to comment #1.

3. Directly in front of the Oceanview Center, the following flora and fauna will be ripped out and eliminated for the purpose of bus traffic: EIGHT (8) 30 foot palm trees, three (3) Plumeria trees, a 50 foot segment of curbed grass.

Response: See response to comment #1.

4. Radical alterations required for turning radius of large rapid transit vehicles in this segment (and not addressed in the DEIS) are: 1) Narrowing of Nimitz Boulevard to two lanes at Richards Street area; 2) Closing of Halekuanuia turnoff lane for Diamond Head bound traffic on Nimitz Blvd. for access to Kakaako area, as Halekuanuia will be BRT only from Richards to Punchbowl Street.

ILL CONCEIVED DUE TO CONGESTION  
 UNCONGESTED ALTERNATIVE  
 UNCONGESTED ALTERNATIVE



Response: Nimitz Boulevard will not be reduced to two lanes at Richards Street. BRT vehicles will not be turning at Halekauwila and Richard Streets. The Halekauwila turnoff lane will not be closed to Koko Head-bound traffic. General traffic will be allowed on Halekauwila Street from Richards to Punchbowl Street.

5. Because this particular segment of the BRT is ~~if~~ conceived, three following alternatives are submitted.

The 'stop' segment of the Waikiki bound route could be routed: 1) Hotel Street to King Street to Punchbowl Street to Pohukaina St. where a Passenger Transit Stop could be located at the Federal Building. 2) Hotel Street to King Street to South Street to Pohukaina Street. Both of these possible alternatives have less congestive impact than that proposed.

Response: The King Street to Punchbowl Street alignment had been looked at and rejected due to the significant traffic impact at the King/Punchbowl Streets intersection of adding another signal phase to accommodate the BRT turning from Punchbowl making bound to King Street Ewa bound. Rerouting the BRT along King Street all the way to South Street was rejected since it would miss serving the Federal Building and several other important generators on Halekauwila Street.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

  
CHERYL D. SOON  
Director

MARK A. MONOSCALCO  
430 Lewars St., # 23D  
Honolulu, HI 98815-2421  
(808) 923-2579  
E-mail: mark@monoscalco.com

Attn: Ms. Cheryl Soon  
DOTS  
City & County Hqn.  
650 S. King St. 3rd Floor  
Honolulu HI 96813

Re: In-Town Bus Rapid Transit

To Whom It May Concern:

I wish to voice my opposition to the current proposal for the In-Town Bus Rapid Transit. Two aspects of the current proposal will increase traffic congestion. First the use of existing traffic lanes for the exclusive use of BRT will reduce the capacity of the streets for travel by all other types of vehicles. Second giving traffic signal priority to BRT will cause increased traffic congestion on all streets that the BRT crosses.

The design premise of this project is biased against automobile use. Providing alternatives to the private automobile is the stated purpose of this project (see DEIS S.1.1). The proper purpose of this project should be to reduce overall traffic congestion.

If the exclusive bus lanes are put into operation and the BRT is allowed to interrupt traffic signals, the motoring public will become outraged at the increase in traffic congestion. This outrage will follow the same pattern as the reaction to the recent traffic camera program. Predictability, the results will be the same. After enough public complaint, the City and County will be forced to remove the priority lanes and discontinue use of traffic signal interruption. This will mean that all money spent on construction of the priority lanes and traffic signal interruption equipment will be lost. In addition more money will need to be spent to remove the priority lanes.

Our current traffic system would benefit greatly from the following improvements:

1. Street widening - additional lanes for all type of vehicle traffic.
2. Intersection channelization - left and right turn bays with turn arrows.
3. Bus pullouts - allow a turn out lane for the Bus to load and unload passengers.
4. Coordinated traffic signals - using real time traffic data to change signal cycles.

The following streets could be upgraded to increased traffic capacity:

1. Auahi St. from South St. to Queen St.
2. Queen St. from Nimitz Hwy to Kamakee St.
3. McCully St. from H-1 to Kalakaua Blvd.
4. Bingham St. from Punahou St. to McCully St.
5. Punahou St. from King St. to Philip St.
6. Ward Ave from H-1 to King St.
7. Lusitania St. from Punchbowl St. to Kinau St.

April 18, 2002

DEPARTMENT OF TRANSPORTATION SERVICES  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE WESKO • KUYAMOTO  
DEPUTY DIRECTOR

TPD02-00600

November 13, 2002

Mr. Mark A. Monoscalco  
430 Lewers Street, #23D  
Honolulu, Hawaii 96815-2421

Dear Mr. Monoscalco:

Subject: Primary Corridor Transportation Project

This is in response to your April 18, 2002 letter and your oral testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. I wish to voice my opposition to the current proposal for the In-Town Bus Rapid Transit. Two aspects of the current proposal will increase traffic congestion.

Response: Comment noted.

2. First the use of existing traffic lanes for the exclusive use of BRT will reduce the capacity of the streets for travel by all other types of vehicles.

Response: It is not the conversion of lanes that will create the congestion. The congestion for motorists will be there without the BRT. When people are diverted onto public transit, congestion for motorists will be less with the Refined Locally Preferred Alternative (LPA) than it would be with the No-Build or Transportation System Management (TSM) Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

3. Second, giving traffic signal priority to BRT will cause increased traffic congestion on all streets that the BRT crosses.

Response: The potential for the BRT vehicles to extend the green phase will only be implemented at locations where it will not significantly impact cross street traffic.

4. The design premise of this project is biased against automobile use. Providing alternatives to the private automobile is the stated purpose of this project (see DEIS S. 1).

Response: The PCTP has focused on the transit portion of the island-wide transportation plan. Highway improvements have been addressed in the OMOPO regional plan update (TOP 2025).

5. The proper purpose of this project should be to reduce overall traffic congestion.

Response: Which it will do.

The Bus system could be improved by applying the following suggestions:  
1. Using global positioning satellite receivers on each bus to provide real time bus locations. This will allow real time bus scheduling to eliminate bus bunching (when several buses are traveling the same route close together).  
2. Using the GPS data to display real time bus arrival schedules at each bus stop.  
3. Eliminate redundant bus stops. By removing stops that are too close together overall bus travel time is reduced.

I would like to make a final comment about our "societal choice to have a good bus system". Mass transportation was originally provided by private enterprise. Our government's current monopoly of the mass transportation business was only accomplished by legislation and regulation, not by the government providing better service than the private sector. If private enterprise were allowed to compete for mass transit customers we would very likely have a more responsive transportation system and at a lower overall cost.

Sincerely Yours,

Mark A. Monoscalco

6. If the exclusive bus lanes are put into operation and the BRT is allowed to interrupt traffic signals, the motoring public will become outraged at the increase in traffic congestion. This outrage will follow the same pattern as the reaction to the recent traffic camera program. Predictability, the results will be the same. After enough public complaint, the City and County will be forced to remove the priority lanes and discontinue use of traffic signal interruption. This will mean that all money spent on construction of the priority lanes and traffic signal interruption equipment will be lost. In addition more money will need to be spent to remove the priority lanes.

**Response:** Comment noted.

7. Our current traffic system would benefit greatly from the following improvements:

1. Street widening - additional lanes for all type of vehicle traffic.
2. Intersection channelization - left and right turn bays with turn arrows.
3. Bus pullouts - allow a turn out lane for the Bus to load and unload passengers.
4. Coordinated traffic signals - using real time traffic data to change signal cycles.

**Response:** 1.) Additional lanes at bottleneck locations could be beneficial. General lane widening to increase overall roadway capacity would be a temporary fix, not a long-term solution. 2.) Left and right turn bays do help traffic flow at intersections, and the Refined LPA implements them where feasible along the In-Town BRT alignment. 3.) Bus pullouts are recommended in the Refined LPA in the Dillingham Boulevard and Kuhio Avenue corridors to reduce the impacts of local buses on general traffic. 4.) The City has a state of the art traffic management center. It also has an ongoing traffic signal optimization program. Given the large number of traffic signals in Honolulu, it will take time to optimize all of the signals, but the process has been initiated and the public will see benefits from the program in the near future.

8. The following streets could be upgraded to increase traffic capacity:

1. Auahi St. from South St. to Queen St.
2. Queen St. from Nimitz Hwy to Kamakee St.
3. McCully St. from H-1 to Kalanikahe Rd.
4. Bingham St. from Punahou St. to McCully St.
5. Punahou St. from King St. to Philip St.
6. Ward Ave. from H-1 to King St.
7. Lusitania St. from Punchbowl St. to Kīkau St.

**Response:** The City continues to look for ways to improve its roadway system. These suggestions will be incorporated into the City's on-going review. It should be noted that the routing of the University Branch of the Refined LPA was relocated from Ward Avenue to Pensacola Street because of concerns regarding the capacity of Ward Avenue.

9. The Bus system could be improved by applying the following suggestions:
1. Using global positioning satellite receivers on each bus to provide real time bus locations. This will allow real time bus scheduling to eliminate bus bunching (when several buses are traveling the same route close together).
  2. Using the GPS data to display real time bus arrival schedules at each bus stop.
  3. Eliminate redundant bus stops. By removing stops that are too close together overall bus travel time is reduced.

**Response:** 1.) GPS is already installed on buses and real-time bus schedule kiosks are also planned. 2.) The City is currently reviewing various intelligent transportation system (ITS) elements that could eventually be integrated into the City transit system. 3.) Local bus stops are

closely spaced to provide maximum transit access. To decrease transit travel time, limited stop bus service such as the CityExpress has been introduced. The proposed BRT included in the Refined LPA is the next step in providing even faster service.

10. I would like to make a final comment about our societal choice to have a good bus system. Mass transportation was originally provided by private enterprise. Our government's current monopoly of the mass transportation business was only accomplished by legislation and regulation, not by the government providing better service than the private sector. If private enterprise were allowed to compete for mass transit customers we would very likely have a more responsive transportation system and at a lower overall cost.

**Response:** The reason that the City took over the bus system is that the private sector could no longer make a profit running it and were in the process of abandoning all but the profitable routes. Since a significant segment of the population is dependent on transit for their mobility, the City with the public's support stepped in to ensure that these people would not be left immobile. There is a role for the private sector in the Refined LPA, which is to provide contracted circulator services.

11. I've been a resident there (Waikiki) for over 13 years. I wish to voice my opposition to the current proposal for the In-Town Bus Rapid Transit.

**Response:** Comment noted.

12. First, the use of existing traffic lanes for the exclusive use of the BRT will reduce the capacity of the streets for travel by all other types of vehicles.

**Response:** See response to comment #2.

13. Second, giving traffic signal priority to BRT will cause increased traffic congestion on all streets that BRT crosses.

**Response:** See response to comment #3.

14. The design premise of this project is biased against automobile use. Providing alternatives to the private automobile is the stated purpose of this project, and that is listed in the DEIS, section one.

**Response:** The Supplemental Draft Environmental Impact Statement (MIS/DEIS), SDEIS, and FEIS Chapter 1 state the purposes of the Primary Corridor Transportation Project as:

1. Increase the people-carrying capacity of the transportation system in the primary transportation corridor by providing attractive alternatives to the private automobile.
2. Support desired development patterns.
3. Improve the transportation linkage between Kapolei, which is envisioned to be the "Secondary Urban Center" of Oahu, and Honolulu's Urban Core.
4. Improve the transportation linkages between communities in the Primary Urban Center (PUC) to increase the attractiveness of in-town living.

15. I believe the proper purpose of this project should be to reduce overall traffic congestion.

Mr. Mark A. Monoscalco  
Page 4  
November 13, 2002

**Response:** The BRT project alone cannot reduce overall traffic congestion. The Oahu Metropolitan Planning Organization's (MPO's) Transportation for Oahu Plan, TOP 2025 presents the transportation projects, including the Refined LPA, that collectively will help alleviate traffic congestion.

16. If the exclusive bus lanes were put into operation and BRT is allowed to interrupt traffic signals, the motoring public will become outraged at the increase in the traffic congestion. I believe this outrage will follow the same pattern as the reaction to the recent traffic camera program. Predictably, the results will be the same. After enough public complaint, the City and County will be forced to remove the priority lanes and discontinue use of traffic signal interruption.

This will mean that all of the money spent on the construction of the priority lanes and traffic signal interruption equipment will be lost. In addition, more money will need to be spent to remove the priority lanes.

**Response:** Comment noted.

17. I would like to make some suggestions to improve our current traffic system. I believe we would greatly benefit from the following improvements: Street widening, additional traffic lanes for all types of vehicles.

**Response:** See response to comments #7 and #15. The TOP 2025 plan includes street widening and additional traffic lane projects.

18. Suggestion two would be intersection channelizations, adding left and right turn lanes, with turn arrows.

**Response:** See response to comments #7 and #15. The TOP 2025 plan includes intersection improvement projects.

19. Suggestion three, bus pullouts, allow a turn-out lane for the bus to load and unload passengers without blocking traffic lanes.

**Response:** Bus turnouts will be installed along sections of Dillingham Boulevard and Kuhio Avenue.

20. And suggestion four, coordinated traffic signals, by using realtime traffic data to change traffic signal times.

**Response:** The City's in-town traffic system has this capability now.

21. I believe the following streets could be upgraded to increase traffic capacity. From South Street to

**Response:** See response to comments #8 and #15.

22. I'd like to make a final comment about a quote that's been in the paper about our societal choice to have a good bus system. Mass transportation was originally provided by private enterprise. Our government's current monopoly of the mass transportation business was only accomplished

Mr. Mark A. Monoscalco  
Page 5  
November 13, 2002

by legislation and regulation, not by government providing better service than the private sector. If private enterprise were allowed to compete for mass transit customers, we would very likely have a more responsive transportation system and at an overall lower cost.

**Response:** See response to comment #10.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director





October 25, 2000

Page # 2

ROUTED 10/12

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City & County of Honolulu  
711 Kapiolani Boulevard, Suite 1200  
Honolulu, Hawaii 96813

**RE: Oahu's Trans 2K Mass Transit System Plan**

Dear Ms. Soon:

I, am writing to you in response to the different types of transportation systems slated for the island of Oahu for the state of Hawaii. I do not drive and am solely dependent upon the transportation systems of Hawaii like, the buses (regular & express services), the taxicabs and sometimes catching a ride with my friends that drive.

**I am in support of the TSM (Transportation System Management) for the Urban Honolulu areas, with a partial BRT (Bus Rapid Transit) servicing the Suburbs to bring commuters to Urban downtown. It makes sense to bring in people from the Suburbs rapidly using the High Occupancy Vehicle or the Zipper lanes to the downtown areas or transfer at transit centers to another transit vehicle closer to your destination (i.e. regular service or express buses) via a transit vehicle. The heavily used streets of Urban Honolulu servicing both the public and private sectors are not as wide across as some of the other cities in the continental United States like Boston, Albany, New Orleans, Miami, etc. The streets in Urban Honolulu are used by private & commercial vehicles such as cars, vans, mini-buses, buses, mopeds, trolleys,**

motorcycles and bicycles. In fact, the number of trolley services and routes have increased in the last few years due to tourist vacationing and having their Wedding ceremonies in Hawaii. If a BRT (bus rapid transit) system is chosen, 2 - 2-1/2 lanes of the street will be converted to dedicated lanes for the transit vehicles as well as a median strip to unload & pick-up passengers as explained by the engineer of the project: Closing of 2 lanes of traffic, especially on busy, busy Dillingham Boulevard will have serious problems as only 1 lane of traffic is opened for travelers going East and the other 1 lane for travelers going West. The problem also persists on Kalakaua Avenue in the heart of Waikiki district near the famous Waikiki & Kuhio beach areas. Previously 4 lanes of traffic headed towards the east, now 1 lane of traffic has been changed to a curb for trolleys and private tour vehicles to load & unload passengers. If 1 more lane or traffic is changed to a dedicated lane for the Transit vehicle, only 2 lanes of traffic will serve everyone else.

**ADDITIONAL PROBLEMS** which need to be addressed:

1. The type of BRT system the City & County of Honolulu is proposing will consist of electric embedded plates on the dedicated lanes which will activate the tram whenever the protruding metal strip touches the electric plates. **QUESTION:** what happens when there are water main breaks on the road as has been happening recently in Honolulu (many water pipes are 40 - 60 years old and in dire need to be replaced). In fact on Monday, October 23<sup>rd</sup>, there was a water main break on Kuhio Avenue again. About 3 - 4 months ago, there were 3 major water main breaks on the main thoroughfare of Kapiolani Boulevard in

About a 1 month period. The Board of Water Supply crew worked throughout the night & day, but took longer than usual, due to underground electric and cable wiring under the streets. These are just 2 of the proposed streets to be converted to a IN-TOWN BRT system lane. Will the transit vehicle be electrically charged and harmful to anyone on the tram? What about people with Pacemakers?

2. The dedicated lanes will be solely used by the transit tram, that anyone who wishes to make a left turn into a driveway, must approach a dedicated intersection, then make a U-turn and return in the opposite direction to enter the intended driveway, even though it is several blocks away.

3. If there is a traffic accident or a stalled vehicle on the street, how will drivers be able to proceed around the accident, if only 1 lane of traffic is opened? How would emergency vehicles like the police, ambulance and fire trucks be able to pass? Will everyone be allowed to use the dedicated lanes also?

4. Is there enough room for large commercial, construction, military vehicles, machineries, and semi-trucks with containers - since some of them require 1 - 2 lanes of traffic to maneuver on the roads. How would these huge vehicles be able to make wide right turns because of the way they are manufactured and cannot infringe onto the dedicated lanes?

5. Is there enough space on the median strips for passengers including the elderly, physically handicapped, adults with babies, bicyclists and wheelchair bound to

load and unload on the transit platforms? I wonder how people with wheelchairs will be able to unload out of the trams, as someone else in a wheelchair boards the tram, causing massive jam on the median strip?

6. The intervals between transit trams is unrealistic. The time limit is between 4 - 8 minutes and between 2 - 4 minutes during rush hour. I docked the time it took passengers riding the Ala Moana Center Shuttle bus to unload and board at the major Ala Moana Center transit center stop. The time it took a full to capacity bus (these are not the articulated buses that are used for express routes) filled with 65 passengers to unload from the front & back doors and for 20 passengers to board the bus was approximately 2 minutes. On another day, it took 60 passengers to unload and 25 passengers to board the bus approximately 3 minutes. These were healthy young to middle aged passengers, no one requiring extra time to stow away their bicycle, parents carrying babies, carrying baby strollers, diaper bags or wheelchair bound passengers. What happens when you encounter passengers that require additional attention and time before the bus driver may leave the transit area? How can you justify the timetable? It is a vital transportation link for those on fixed income and movement is not as flexible as others. Many other factors are involved in the timetable. The driver of the bus route is asked for directions, which bus will take people to their destination, if transfers are needed - directions on transfer points, explanation of Express buses with its limited stops - especially elderly citizens and foreigners who don't understand English nor the word "Express"

Even though through Mayor Harris's visioning team expressed a mass transit system about 2 years ago, the communities that will be affected by the Mass Transit were never consulted or any information given till September 26, 2000. Additional informational meetings and public hearings were held on October 2<sup>nd</sup>, 5<sup>th</sup>, 23<sup>rd</sup> and 26<sup>th</sup>. The general public has till November 6, 2000 to respond and submit written testimony. The City & County of Honolulu Transportation Department planners, engineers, consultants spoke of 3 mass transit proposals as in the planning stage, but the presentations I have seen is leaning towards the BRT & In-Town BRT System (electric plates embedded on the streets to power the transit vehicles) - even though only 1 city in Italy is currently using it nor has it been formally approved as the system best for the Island of Oahu in the state of Hawaii. There have not been any other tests conducted to compare the effectiveness of this particular system. I understand that several drivers were approached earlier this year to be drivers for the TRANSIT TRAM vehicles prior to any decision on which of the 3 mass transit alternatives best fits towards the year 2025 for the Island of Oahu as the population continues to grow in certain areas like Kapelei. Urban Honolulu is very congested due to the fact that the majority of Oahu's population work, live, play and drive their vehicles as well as influx of Major Office buildings, restaurants, parking lots, condominiums, houses, parks and attractions for the visitor industry. The vicinity of Kapelei and other Suburb cities on Oahu are still vast open areas and is starting to develop as a 2<sup>nd</sup> Major City and better suited for dedicated lanes or use of Zipper lanes to accommodate the BRT system proposed by the City & County Transportation Department and the Visioning Team.

There is a trend for the population in Hawaii to work out of their own homes using their computers to do business on the Internet like banking, communicate, reference, shop, etc. The people living in the suburbs & Urban Honolulu may also utilize the community shops and services, but occasionally need to travel to downtown or other districts of Oahu. The people that need to commute will utilize the MASS TRANSIT Services- either with a direct route or transfer at transit centers to buses that will take them closer to their destinations. Sometimes, it may take longer via the regular bus routes (due to frequent stopping at each bus stop) or it may be shorter and takes less time then traveling on a BRT tram route as several transfers maybe needed to reach their destination. Once on the TRAM the ride is faster (due to limited stops) - BUT THE KEY IS THE PASSENGER MUST BE ON THE TRAM and not be waiting for a tram or a bus at the transit centers to experience such a faster timetable to reach their destination. On 1 occasion, I caught a bus to get to City Express B bus stop in Waikiki. I waited 5 minutes for the Express "B" Bus, then I reached Downtown Honolulu in 9 minutes, finally walked for 3 minutes to Longs Drugs Store for a total travel time of 17 minutes. If I catch the regular bus to Longs Drugs Store it takes approximately 20 - 27 minutes with the bus stop located directly across the street. The Express Bus system may save time in reaching your destination, but it also depends whether I have bulky & heavy packages to carry then I would prefer to catch only 1 bus rather then to catch several different buses to get home faster. It's a matter of convenience or time factor. This is the same argument with the IN-TOWN BRT System - the difference is that the Transit stops are farther apart

because there are less stops along the route, but how much more of an inconvenience is it to wait & transfer to other transit vehicles (maybe 2 - 3 more) at the Transit stop?

I support the BRT (Bus Rapid Transit) System from the Suburb to Urban Honolulu, then use the Transportation System Management system for Urban Honolulu. It could expand the City Express routes A, B & Country Express C with very limited bus stops), other express route services and by consolidating some of the regular bus routes into express routes for Urban Honolulu. The City & Country Express has been operating for about 2 months, starting from August 20, 2000, and is not fully tested to its full capacity. The BRT System from the suburbs may use some other type of tram that is environmental friendly and that does not need to use an electric plates embedded into the street. It need not be a system that does require dedicated lanes (which tears up the streets, trees planted on the median strips need be removed, motorist will not be able to turn left into the driveways, etc.) It may also pick-up passengers from the safety of the curb - especially for the elderly parents with babies, for children, bicycle riders, wheelchair bound as well as the other handicapped (blind) passengers. Why is the City & County of Honolulu pushing for a RAPID TRANSIT SYSTEM (OR IS IT A LIGHT RAIL SYSTEM?) that will use an embedded plate system, is it a possibility that a private developer or contractor is anxiously approaching the City & County to consider their system & products?

Important decisions require time, careful study, careful planning and consideration with many factors and variables that will affect the transportation flow for

the general public as well as thousands of visitors that will visit and use the transit system of the State of Hawaii, as a very unique and special place, much smaller than Atlanta, New York, Los Angeles, San Francisco and other major cities. The system that works beautifully for their cities, may not necessarily be the right one for the Island of Oahu. Hawaii is a tourist oriented destination of which the Transit System will need to compete with private tour vans & buses, private trolleys, bicycles and other means of transportation in Urban Honolulu.

Thank you for the opportunity.

*Daisy M. Mura*

Daisy M. Mural  
A CONCERN BUS RIDER & CITIZEN



APR 20 2002

April 20, 2002

FDEIS Testimony 4/20/2002

Ms. Cheryl Soom, Director  
Department of Transportation Services  
City and County of Honolulu  
650 S. King Street, 3<sup>rd</sup> floor  
Honolulu, Hawaii 96813

**RE: Final Draft Environmental Impact Statement--Bus Rapid Transit**

I, Daisy Murai, a tax payer, resident of Kapahulu and whose main mode of transportation is via Oahu Transit Services TheBus System. I DO NOT SUPPORT the IN-TOWN BRT portion of the Bus Rapid Transit plan. I am in full support of a Bus Rapid Transit system for the areas outside of the Primary Urban Center of Honolulu. There is at least 1 traffic accident caused from motorist traveling to and from the outskirts of Honolulu to the Downtown area almost on a daily basis. This is the area of major traffic congestion in the mornings and afternoons and they deserve first preference to relieve congestion.

The In-Town BRT plans have many more factors to consider that will require extensive, detailed planning and design. There are several problems that I find that have not been addressed and taken into consideration for the Downtown streets.

- 1) Implanting electronic metal strips on the streets for exclusive or shared usage by the BRT tram or vehicle.

A) Have all the streets (Pensacola, Alakea, Bishop, Dillingham, Ala Moana, University, etc) been up-graded to handle the extra load on the streets (sewer lines, water pipes, cable wires) or will they be fixed when the electric plates are embedded on the streets - adding more expense? Presently, there have had almost 1 water main break per week somewhere on the island of Oahu. Some have been major breaks (ie. McCully & Kapiolani corner) Every break on the street, the tram will not proceed and repairs galore. - major problems!

B) On the shared lanes, is the problem of picking-up trash by the private refuse companies for tenants affected being addressed and solved? (Trash bins are left on the streets in the morning on Alakea, Bishop, Ala Moana, Kuhio Avenue, etc.-due to not enough space to maneuver the huge trucks) This problem will also hamper passengers loading and unloading from vehicles, as well as vendors delivering their products.

C) Will salt water corrode the metal strips? The corner of Saratoga and Kalia Roads, the salt water from the ocean surges onto the road through the storm drain whenever there is high tide.

Page 2

- 2) Time Schedule - is very unrealistic

A) 2, 4, 6, 8 minute intervals during peak hours of the day is very unrealistic. It does not give the riders enough time to depart and board (even able bodied passengers - refer to my first testimony on Ala Moana Shuttle bus route No. 8 - where it took 3 - 4 minutes to unload a full to capacity of 60 - 65 able bodied passengers). It is not taking handicap passengers into account - especially if there are wheelchair bound (sometimes they require 10 minutes to settle into their seats). This will also prevent the handicap, senior citizens and wheelchair bound passengers from boarding - ADA rule not followed. It is not taking into account passengers with baby strollers who require additional time to settle into their seats.

B) If the interval between trams are too short (to prevent an overlap of the next tram traveling on the same route), very few passengers will be able to board per tram. The transit service will not be efficient nor profitable, causing higher maintenance costs, increase in the fares, higher taxes, higher service fees and even less tram services. This defeats the purpose of the transit service as a high capacity people mover.

C) The City & County Express system is great for getting around Oahu, but even that system has an overlap of busses catching up to the bus in front. Sometimes, the next bus is with-in 1 minute of the earlier bus.

- 3) Routes

A) Has a scientific survey being conducted with tests to determine which areas need this system more than others? Has a trial test being conducted before implementation - where all the minut problems

B) Some streets needs to be expanded to accommodate the BRT System, have thesees being addressed?

C) Has the impact on neighboring streets and neighborhood being addressed - if the motorists decide to avoid BRT lanes on Dillingham, Kapiolani, Ala Moana, University, Kalakaua and Kuhio Avenues, etc. and travel through the adjacent neighborhoods? This is the same approach as a CTAP project where motorist have taken side streets when they spot a CTAP project in operation (police officers with radar guns checking the speed of the automobiles and residents holding-up signs to slow down and drive carefully).

D) Traffic gridlock, accidents and road rage will occur in the Primary Urban Center of Honolulu due to the narrowness of the roadways, unlike other larger metropolitan cities that can accommodate many more lanes of traffic than Oahu.

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FDEIS Testimony 4/20/2002

May 3, 2002

Educating the general public, more public input, testing and re-testing are vital and crucial elements to make the BRT System work. Without addressing these important input from the general public and specialists, the transit problems will never be solved. If this is the best, most efficient, most reliable, most affordable, most convenient transit system for Oahu, then everyone connected with this particular system should get out of their cars and commute utilizing the BRT System on a daily basis.

Thank you for the opportunity to speak

Daisy Murai  
3039 Kaunaoa Street  
Honolulu, Hawaii 96815

RE: Primary Corridor Transportation Project  
Island of Oahu, Hawaii (SDEIS)

Dear Ms. Soon,

I have enclosed additional comments to the Supplemental Draft Environmental Impact Statement (SDEIS) on the Bus Rapid Transit (BRT) system.

cc: Genevieve Salmonson, Director - Office of Environmental Quality Control, State of Hawaii

These additions are copies that I submitted to Ms. Donna Turchie, Senior Transportation Representative of the Federal Transit Administration, Region IX, and to Ms. Genevieve Salmonson, Director - State of Hawaii, Office of Environmental Quality Control.

Thank you for the opportunity to respond from a private citizen who rides the bus daily.

*Daisy M. Murai*  
Daisy M. Murai  
3039 Kaunaoa Street  
Honolulu, Hawaii 96815

Ms. Cheryl Soon, Director  
Dept. of Transportation Services  
City and County of Honolulu  
650 S. King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

MAY - 6 2002



May 3, 2002

Ms. Donna Turchie  
Senior Transportation Representative  
Federal Transit Administration  
Region IX  
U.S. Department of Transportation  
201 Mission Street, Suite 2210  
San Francisco, CA 94105-1839

RE: SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT  
TESTIMONY FOR HONOLULU, HAWAII & ISLAND OF OAHU  
BUS RAPID TRANSIT (BRT)

Dear Ms. Turchie:

Enclosed is my written testimony that I presented at the Transit Public Hearing on April 20, 2002 at the Hawaii Convention Center in Honolulu, Hawaii. This is the testimony City & County of Honolulu Transportation Director, Cheryl Soon and State of Hawaii Office of Environmental Quality Control Director Genevieve Salmonson both received.

I still oppose the In-Town BRT portion of this mass transit system plan for the Primary Urban Center of Honolulu and the Island of Oahu presented on the Supplementary Draft Environmental Impact Statement. This phase should wait till outside areas of Honolulu have their traffic congestion problems solved first before attempting to proceed with the In-Town route from Iwilei to Waikiki as proposed by City Director Soon & City Council Transportation Committee Chairperson Bainum. The water & sewer pipes in Honolulu have not been up-graded for years as countless number of water main pipes have broken with-in the last 3 years, due to wear and tear as heavier motor vehicles (trolleys, buses, limousines, trucks, SUV) use the roadways. These are the very streets that the City wish to start the Bus Rapid Transit System, with no mention of up-grading the roadways before commencing with this most ambitious project.

The first priority should encompass the areas outside of Urban Honolulu, as these are the areas most affected by traffic gridlock for Monday - Friday commuters. I feel that this is where the transit plans should be implemented first.

The time intervals between trams are very unrealistic. My main mode of transportation is riding the City Buses to my destinations. I timed 60 - 65 able bodied persons getting off the bus No. 8 Shuttle Bus between Waikiki and Ala Moana (Shopping) Center. It took 3 - 4 minutes for passengers to get off and another 4 - 5 minutes for passengers to get on the bus to travel back to Waikiki with their bags and boxes of purchases, as well as families with baby strollers and toddlers. This does not take into account handicap passenger that need extra time. The time intervals as proposed by the City & County of Honolulu of 2, 4, 6, 8 minutes during rush hour  
Daisy Murai, 3039 Kaunaoa Street, Honolulu, Hawaii 96815

are totally unrealistic. A wheelchair rider needs 5 - 10 minutes to settle into his or her seat from the curbside loading platform. If the rush hour intervals are followed, very few passengers will be able to board or get off the trams, as the next one is right behind it. The trams will cause gridlock and not be able to keep up with the time schedule.

The loading platforms for passengers in the middle of the streets will not be large enough to accommodate free movement for passengers with wheelchairs, baby stroller, walkers and folding shopping carts. In Japan, I witnessed in certain areas that utilize boarding platforms in the middle of the streets crammed pack with students waiting for their buses - sometimes with barely room to spare. I shudder to think what may happen when the students are inattentive to the surrounding traffic while on the boarding platform. What happens when toddlers and children stray from their parents.

I also see problems of jaywalkers from young to old in certain parts of Honolulu - like Downtown, Chinatown, Kapiolani Boulevard and especially in Waikiki. People are rushing to catch a certain bus, in a hurry or inattentive to the surrounding traffic. These are problems facing Honolulu presently.

I'm sure that the best engineers, consultants and experienced personnel have spent countless hours of planning, preparing, cross examining to study the huge impact created by such a massive mass transit system, but public input is also crucial and vital, as these are the people who will use and be most affected by this project. Educating the public, testing and re-testing are important aspects not to be taken for granted.

I suggest that all those connected with the project and those in support utilize the In-Town BRT system. Riders want the most direct route and closest to their destinations, rather than spend time waiting at transit centers for their connecting tram. If the ridership is low, the fees will increase to a point many people will not be able to afford to ride the BRT in the future. The heavy burden to maintain the BRT will fall on the tax payers of Hawaii.

Thank you for your attention.

*Daisy M. Murai*

Daisy M. Murai  
3039 Kaunaoa Street  
Honolulu, Hawaii 96815

cc: City & County of Honolulu Transportation Director, Cheryl Soon  
cc: State of Hawaii Office of Environmental Quality Control Director Genevieve Salmonson



DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
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JEREMY HARRIS  
MAYOR

Ms. Daisy M. Murali  
Page 2  
November 13, 2002

CHERYL D. SOOH  
DIRECTOR

GEORGE NEMO • MIYAMOTO  
DEPUTY DIRECTOR

TPD 10/00-05219R  
TPDS02-01802R

November 13, 2002

Ms. Daisy M. Murali  
c/o Kapahulu Neighbors  
3039 Kaunaoa Street  
Honolulu, Hawaii 96815

Dear Ms. Murali:

Subject: Primary Corridor Transportation Project

This is a combined response to your comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your October 25, 2000 letter regarding the MIS/DEIS, Part B responds to your April 20, 2002 letter, your oral testimony at the SDEIS April 20, 2002 Public Hearing, and your May 3, 2002 letter regarding the SDEIS.

Part A - MIS/DEIS Comments

1. I am in support of the TSM (Transportation System Management) for the Urban Honolulu areas, with a partial BRT (Bus Rapid Transit) servicing the Suburbs to bring commuters to Urban downtown. It makes sense to bring in people from the Suburbs rapidly using the High Occupancy Vehicle or the Zipper lanes to the downtown areas or transfer at transit centers to another transit vehicle closer to your destination (i.e., regular service or express buses) via a transit vehicle.

Response: Comment noted. It states the commenter's preference for an LPA.

2. If a BRT (bus rapid transit) system is chosen, 2 - 2-1/2 lanes of the street will be converted to dedicated lanes for the transit vehicles as well as a median strip to unload & pick up passengers as explained by the engineer of the project. Closing of 2 lanes of traffic, especially on busy, busy Dillingham Boulevard will have serious problems as only 1 lane of traffic is opened for travelers going east and the other 1 lane for travelers going west.

Response: The BRT Alternative is comprised of a mix of exclusive BRT, semi-exclusive BRT and mixed-use lanes. The BRT system strives to strike a balance between transit speed and impacts to general traffic. In segments where it was judged that roadway capacity was needed for general traffic and the BRT operation would not be significantly affected, exclusive lanes were replaced by either semi-exclusive or mixed-flow operation. In areas of high BRT ridership volumes, exclusive transit lanes were retained such as on Dillingham Boulevard. To reduce impacts to general-purpose traffic on Dillingham Boulevard, 18-foot-wide lanes are proposed between Puuhala Street and Waiala Road. Eighteen-foot-wide lanes will permit vehicles to go around buses stopped at the curb and right-turning vehicles. Separate left-turn U-turn lanes will also be provided at signalized intersections. To preserve the True Kamani trees, instead of 18-foot lanes between Waiala Road and Kasahi Street turnouts will be provided for local buses.

Because of the diversion of people from autos to transit, even with the BRT lanes, the traffic LOS along Dillingham Boulevard will be equal to or better than conditions with the No-Build Alternative. Additionally, traffic LOS on parallel streets such as N. King Street and Nimitz Highway will be equal to or in most cases better with the BRT lanes on Dillingham Boulevard than without them.

Moreover, the exclusive BRT lanes on Dillingham Boulevard will enable Dillingham Boulevard to carry 3 times the number of people that it can carry today.

3. The problem also persists on Kalakaua Avenue in the heart of Waikiki district near the famous Waikiki & Kuhio beach areas. Previously 4 lanes of traffic headed towards the east, now 1 lane of traffic has been changed to a curb for trolleys and private tour vehicles to load & unload passengers. If 1 more lane or traffic is changed to a dedicated lane for the Transit vehicle, only 2 lanes of traffic will serve everyone else.

Response: With the Refined LPA, the lane designation on Kalakaua Avenue between Saratoga Road and Uluhi Avenue will be three mixed-traffic lanes and a semi-exclusive curb lane shared by the BRT, private buses and right-turning autos. On Kalakaua Avenue between Uluhi Avenue and Kapahulu Avenue (i.e. by Kuhio Beach), the BRT will operate in mixed traffic so there will be no change from today in the lane configuration.

4. The type of BRT system the City & County of Honolulu is proposing will consist of electric embedded plates on the dedicated lanes which will activate the tram whenever the protruding metal strip touches the electric plates. QUESTION: what happens when there are water main breaks on the road as has been happening recently in Honolulu (many water pipes are 40 - 60 years old and in dire need to be replaced). Will the transit vehicle be electrically charged and harmful to anyone on the tram? What about people with Pacemakers?

Response: The electrical conductor will be insulated under the ground so that there will be no harmful effects. Additionally, the EPT vehicles will be capable of operating under battery power for short distances, so they will be able to negotiate around any temporary blockages while a broken water main is being repaired.

The manufacturer will be required to develop a method to insulate passengers with Pacemakers from electromagnetic impacts.

5. The dedicated lanes will be solely used by the transit tram, that anyone who wishes to make a left turn into a driveway, must approach a dedicated intersection, then make a U-turn and return in the opposite direction to enter the intended driveway, even though it is several blocks away.

Response: In the case that the BRT lane is located in the middle of the roadway, such as Dillingham Boulevard, left-turns and U-turns are allowed only at designated locations for purposes of vehicle safety. Where the BRT lane is adjacent to the curb, crossing of the lane by other vehicles is allowed.

6. If there is a traffic accident or a stalled vehicle on the street, how will drivers be able to proceed around the accident, if only 1 lane of traffic is opened? How would emergency vehicles like the police, ambulance and fire trucks be able to pass? Will everyone be allowed to use the dedicated lanes also?

Response: The two candidate technologies, embedded plate and hybrid propulsion, both provide the flexibility to operate outside of the designated BRT lanes and therefore can easily maneuver

around accident sites, emergency vehicles and traffic. Also, the proposed network of exclusive and semi-exclusive BRT lanes would greatly enhance emergency vehicle response times providing an uncongested lane for such vehicles to reach incident locations. With proper emergency traffic signal preemptions in place, BRT vehicles would be able to move out of the exclusive lane at the nearest intersection to allow emergency vehicles to pass through the intersection unimpeded by either left turning or cross street traffic.

There are no plans for mixed-traffic to utilize exclusive BRT lanes, however, in the case of an emergency police will handle traffic flow on a case-by-case basis.

7. Is there enough room for large commercial, construction, military vehicles, machines, and semi-trucks with containers - since some of them require 1 - 2 lanes of traffic to maneuver on the roads. How would these huge vehicles be able to make wide right turns because of the way they are manufactured and cannot infringe onto the dedicated lanes?

Response: Generally there will not be any barriers on the exclusive lanes that are not crossable. Larger vehicles that have larger turning radii can infringe temporarily on the exclusive lanes to complete their turns.

8. Is there enough space on the median strips for passengers including the elderly, physically handicapped, adults with babies, bicyclists and wheelchair bound to load and unload on the transit platforms? I wonder how people with wheelchairs will be able to unload out of the trams, as someone else in a wheelchair boards the tram, causing massive jam on the median strip?

Response: The platforms are approximately eight feet wide by 160 feet long. The ADA standard requirement for wheelchair maneuverability is an area eight feet by five feet. There will be sufficient room for ingress and egress on and off the bus. Additionally, there will be at least two boarding and exiting doors on the bus. Boarding and exiting by wheelchair will be much easier than today since the floor of the bus and the passenger platform would be at the same height. A "bridge plate" that extends out from the floor of the bus when the door opens will bridge the gap between the bus and platform, such that no wheelchair lift will be required.

9. The intervals between transit trams is unrealistic. The time limit is between 4 - 8 minutes and between 2 - 4 minutes during rush hour. What happens when you encounter passengers that require additional attention and time before the bus driver may leave the transit area? How can you justify the timetable?

Response: As indicated in response to comment #8, because of prepayment of fares passengers will be able to both enter and exit from both doors on the vehicle. They also will be wider than standard doors. Additionally, since no wheelchair lifts are needed, dwell times at stops will be much shorter than today.

10. Even though through Mayor Harris's visioning team expressed a mass transit system about 2 years ago, the communities that will be affected by the Mass Transit were never consulted or any information given till September 26, 2000.

Response: The Oahu Trans 2K public outreach process started in September 1998 and has continued through preparation of the FEIS. During this time hundreds of public meetings have been held throughout Oahu, with a focus on the communities along the primary corridor to inform

the public of the projects attributes and impacts and to elicit their input during the process. A full listing of the outreach activities is presented in Appendix A of the FEIS (Coordination and Consultation).

11. The City & County of Honolulu Transportation Department planners, engineers, consultants spoke of 3 mass transit proposals as in the planning stage, but the presentations I have seen is leaning towards the BRT & In-Town BRT System (electric poles embedded on the streets to power the transit vehicles) - even though only 1 city in Italy is currently using it nor has it been formally approved as the system best for the island of Oahu in the state of Hawaii. There have not been any other tests conducted to compare the effectiveness of this particular system. I understand that several drivers were approached earlier this year to be drivers for the TRANSIT TRAM vehicles prior to any decision on which of the 3 mass transit alternatives best fits towards the year 2025 for the island of Oahu as the population continues to grow in certain areas like Keppole.

Response: No decision has been reached on the final BRT technology. A final decision is not needed until 2008. Touchable embedded plate is one of the two options being considered. One of the criteria upon which a technology decision will be made is the experience of that technology in passenger service. The City Council will have the option of rejecting any technology that is not considered service proven. No bus drivers have been approached by the City to be drivers for the BRT system.

12. The vicinity of Keppole and other Suburb cities on Oahu are still vast open areas and is starting to develop as a 2nd Major City and better suited for dedicated lanes or use of Zipper lanes to accommodate the BRT system proposed by the City & County Transportation Department and the Visioning Team.

Response: This is what is proposed in the Refined LPA.

13. The people that need to commute will utilize the MASS TRANSIT Services - either with a direct route or transfer at transit centers to buses that will take them closer to their destinations. Sometimes, it may take longer via the regular bus routes (due to frequent stopping at each bus stop) or it may be shorter and takes less time then traveling on a BRT tram route as several transfers may be needed to reach their destination. Once on the TRAM the ride is faster (due to limited stops) - BUT THE KEY IS THE PASSENGER MUST BE ON THE TRAM and not be waiting for a tram or a bus at the transit centers to experience such a faster timetable to reach their destination.

Response: We concur that passengers generally do not like to transfer. The travel demand forecasting models account for the fact that certain passengers will have a faster ride by taking local buses and avoiding transferring. The probability of a passenger selecting a given route is a function of total travel time by the chosen path, including penalties assigned for having to transfer.

14. It's a matter of convenience or time factor. This is the same argument with the IN-TOWN BRT System - the difference is that the Transit stops are farther apart because there are less stops along the route, but how much more of an inconvenience is it to wait and transfer to other transit vehicles (maybe 2 - 3 more) at the Transit stop?

Response: The travel time savings including the transfers, with implementation of the Refined LPA will be, in most cases, faster than exists today. In outlying areas transit hubs will be established that allow for a pre-timed transfer between local circulator buses and BRT express

routes. The additional transferring in the Refined LPA will to a high degree be offset by these timed transfers, and by the more frequent, more comfortable, and more reliable service provided. In many cases the total travel time will be less with the Refined LPA.

15. I support the BRT (Bus Rapid Transit) System from the Suburb to Urban Honolulu, then use the Transportation System Management system for Urban Honolulu. It could expand the City Express routes A, B & Country Express C with very limited bus stops, other express routes services and by consolidating some of the regular bus routes into express routes for Urban Honolulu.

**Response:** Comment noted. It states the commenter's preference for an LPA.

16. The BRT System from the suburbs may use some other type of tram that is environmental friendly and that does not need to use an electric plates embedded into the street. It need not be a system that does require dedicated lanes (which tears up the streets, trees planted on the median strips need be removed, motorists will not be able to turn left into the driveways, etc.) It may also pick up passengers from the safety of the curb - especially for the elderly parents with babies, for children, bicycle riders, wheelchair bound as well as the other handicapped (blind) passengers. Why is the City & County of Honolulu pushing for a RAPID TRANSIT SYSTEM (OR IS IT A LIGHT RAIL SYSTEM?) that will use an embedded plate system, is it a possibility that a private developer or contractor is anxiously approaching the City & County to consider their system & products?

**Response:** The embedded plate technology is only being considered for the In-Town BRT. Buses with diesel or hybrid diesel/electric power will be used in the outlying communities. No manufacturer is being given preferential consideration in the technology selection process.

17. Important decisions require time, careful study, careful planning and consideration with many factors and variables that will affect the transportation flow for the general public as well as thousands of visitors that will visit and use the transit system of the State of Hawaii, as a very unique and special place, much smaller than Atlanta, New York, Los Angeles, San Francisco and other major cities. The system that works beautifully for their cities may not necessarily be the right one for the island of Oahu. Hawaii is a tourist oriented destination of which the Transit System will need to compete with private tour vans & buses, private trolleys, bicycles and other means of transportation in Urban Honolulu.

**Response:** From the outset the Primary Corridor Transportation Project has strived to develop a transit system that uniquely fits the special setting in Honolulu. The purpose of this system however is not to compete with the private transportation providers who very effectively serve the visitor market, it is to better serve the residents of Oahu and to give them a viable alternative to using private autos for certain trips.

Part 8 - SDEIS Comments

18. I, Daisy Mural, a tax payer, resident of Kapahulu and whose main mode of transportation is via Oahu Transit Services TheBus System. I DO NOT SUPPORT THE IN-TOWN BRT portion of the Bus Rapid Transit plan. I am in full support of a Bus Rapid Transit system for the areas outside of the Primary Urban Center of Honolulu. There is at least one traffic accident caused from motorists traveling to and from the outskirts of Honolulu to the Downtown area almost on a daily basis. This is the area of major traffic congestion in the mornings and afternoons and they deserve first preference to relieve congestion.

**Response:** Comment noted. No response required because this is a statement of preference regarding supporting the Regional BRT and not the In-Town BRT.

19. Have all the streets (Pensacola, Alakea, Bishop, Dillingham, Ala Moana University, etc.) been upgraded to handle the extra load on the streets (sewer lines, water pipes, cable wires) or will they be fixed when the electric plates are embedded on the streets - adding more expense? Presently, there have been almost one water main break per week somewhere on the island of Oahu. Some have been major breaks (i.e. McCully and Kapiolani corner). Every break on the street, the tram will not proceed and repairs before - major problems!

**Response:** Provisions to upgrade the streets have been included in the cost estimates. Concrete lanes will be provided for exclusive and semi-exclusive BRT lanes prior to EPT. Provisions to protect utilities from additional traffic load will be incorporated when the concrete lanes are constructed.

20. On the shared lanes, is the problem of picking up trash by the private refuse companies for tenants affected being addressed and solved? (Trash bins are left on the streets in the morning on Alakea, Bishop, Ala Moana, Kuhio Avenue, etc. - due to not enough space to maneuver the huge trucks.) This problem will also hamper passengers loading and unloading from vehicles, as well as vendors delivering their products.

**Response:** DTS will coordinate with building managers where such trash pick-up may need to be scheduled to avoid conflicts with the BRT. Moreover, the BRT vehicles will not be limited to operating in a fixed lane, but will be able to maneuver around obstacles such as trash dumpsters left in the street.

21. Will salt water corrode the metal strips? The corner of Saratoga and Kalia Roads, the salt water from the ocean surges onto the road through the storm drain whenever there is high tide.

**Response:** A non-corrosive metal will have to be used for the EPT plates.

22. 2, 4, 6, 8 minute intervals during peak hours of the day is very unrealistic. It does not give the riders enough time to depart and board (even able bodied passengers - refer to my first testimony on Ala Moana Shuttle bus route No. 8 - where it took 3-4 minutes to unload a full to capacity of 60-65 able bodied passengers). It is not taking handicap passengers into account - especially if there are wheelchair bound (sometimes they require 10 minutes to settle into their seats). This will also prevent the handicap, senior citizens and wheelchair bound passengers from boarding - ADA rule not followed. It is not taking into account passengers with baby strollers who require additional time to settle into their seats.

**Response:** Boarding and alighting will be much easier with the In-Town BRT. Passengers will be able to get on-and-off from a platform that is at the same height as the bus floor (13 inches) so that there will be no steps to negotiate. Also, because there will be prepayment of fares, passengers will be allowed to both enter and leave from any of 2 or 3 doors on the articulated buses. Passengers in wheelchair and scooters will be able to board and alight directly without the use of a lift. Passengers with baby strollers will also find it much easier to get on-and-off the bus. The net effect of these features is that dwell time at stops will be less.

23. *If the interval between trams are too short (to prevent an overlap of the next tram traveling on the same route), very few passengers will be able to board per tram. The transit service will not be efficient nor profitable, causing higher maintenance costs, increase in the fares, higher taxes, higher service fees and even less tram services. This defeats the purpose of the transit service as a high capacity people mover.*

**Response:** See response to comment # 22.

24. *The City & Country Express system is great for getting around Oahu, but even that system is has an overlap of busses catching up to the bus in front. Sometimes, the next bus is within 1 minute of the earlier bus.*

**Response:** Platooning of buses occurs whenever there is frequent service on a route and traffic conditions and other factors such as deploying a wheelchair lift slows down the flow of buses on that alignment. With priority lanes and level boarding for disabled passengers being part of the Refined LPA, these delays will be reduced and platooning, while it will still occur will not happen as often.

25. *Has a scientific survey been conducted with tests to determine which areas need this system more than others? Has a trial test been conducted before implementation - where all the minute problems*

**Response:** Data from household surveys conducted by OMPO and forecasts of future land use were used in establishing current travel patterns and where future service would be most effective.

26. *Some streets need to be expanded to accommodate the BRT System, have these been addressed?*

**Response:** Yes, and they are discussed in the MISDEIS, SDEIS, and FEIS Chapter 2.

27. *Has the impact on neighboring streets and neighborhood being addressed - if the motorists decide to avoid BRT lanes on Dillingham, Keolu, Ala Moana, University, Kalanika and Kuhio Avenues, etc. and travel through the adjacent neighborhoods? This is the same approach as a CTAP project where motorists have taken side streets when they spot a CTAP project in operation (police officers with radar guns checking the speed of the automobiles and residents holding up signs to slow down and drive carefully).*

**Response:** Chapter 4 of the FEIS addresses traffic impacts for each of the streets mentioned. It acknowledges that with the Refined LPA there will be additional impacts to some streets along the alignment, but that overall there will be more benefits to not only transit riders but motorists as well. With regard to impacts to neighborhood streets, most neighborhood streets are discontinuous and would not be used as an alternate route by through traffic. In the event a neighborhood street is impacted, there are a variety of traffic calming measures that can be used to mitigate the impacts.

28. *Traffic gridlock, accidents and road rage will occur in the Primary Urban Center of Honolulu due to the narrowness of the roadways, unlike other larger metropolitan cities that can accommodate many more lanes of traffic than Oahu.*

**Response:** It is not the conversion of lanes that will create the congestion, the congestion for motorists will be there without the BRT. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

29. *Educating the general public, more public input, testing and re-testing are vital and crucial elements to make the BRT System work. Without addressing these important input from the general public and specialists, the transit problems will never be solved. If this is the best, most efficient, most reliable, most affordable, most convenient transit system for Oahu, then everyone connected with this particular system should get out of their cars and commute utilizing the BRT System on a daily basis.*

**Response:** Comment noted. No response required. The public involvement for this project began in 1998 and will continue throughout project development and implementation.

30. *I'm a citizen - a private citizen, member of the general public, and also, I live in Kapaehulu, and I frequently use the bus system every day. In fact, I just came to the Convention Center from all the way down from the zoo area, catching the City Express B. It took 10 minutes. So that system really works, and I'm for that.*

**Response:** We appreciate you attending the public hearing and that TheBus system is your preferred transportation method.

31. *I do not support the In-Town BART system - BRT system portion of the mass transit plan for Oahu. The areas outside the Primary Urban Center of Honolulu seriously need a transit system to get to Downtown and should be the first priority to ease their traffic congestion. They're the ones that always have those traffic accidents at least once a day.*

**Response:** Comment noted. No response required because this is a statement of preference regarding supporting the Regional BRT and not the In-Town BRT.

32. *The In-Town BRT system has many unanswered questions that need to be addressed.*

**Response:** Comment noted. No response required. The MISDEIS, SDEIS, and FEIS present the proposed project and associated impacts, benefits, and mitigations.

33. *One, are the sewer lines, water pipes, cable wires all upgraded? For example, remember the big, big water main break we had at the corner of McCully Street and Keolu? It took a full day before things could be rectified.*

**Response:** Efforts to coordinate utility upgrades have been initiated and will continue during final design.

34. *Two, on shared curb lanes, like Bishop and Alahea, how would deliveries be made?*

**Response:** BRT vehicles will not be operating in mixed traffic lanes on Bishop and Alahea Streets. BRT vehicles will be able to maneuver around parked delivery vehicles, just as existing buses do today.

35. How would loading and unloading of passengers be handled?

**Response:** Loading zones for commercial vehicles loading and unloading freight and passengers will be mitigated if the mitigation measures meet other livable community objectives and are the result of community-based planning. For example, as discussed in Section 4.4, some loading zone losses in Waikiki will be mitigated by creating turnout bays to allow passenger and freight loading during designated hours.

36. Also, private rubbish pickup bins, they cannot maneuver within the parking lots, because it's too narrow, and they have to have the rubbish bins on the outside for pickup.

**Response:** DTS will coordinate with building managers where such trash pick-up may need to be scheduled to avoid conflicts with the BRT. Moreover, the BRT vehicles will not be limited to operating in a fixed lane, but will be able to maneuver around obstacles such as trash dumpsters left in the street.

37. Time schedule is also unrealistic. You say two, four, six, eight minutes. Unfortunately, if you catch the No. 8 shuttle to Ala Moana, it takes about four minutes for able-bodied people that are not handicapped, on wheelchairs, about four minutes just to depart. You really need four to ten minutes just to have someone on a wheelchair to get on the bus into their seats.

**Response:** See response to comment # 22.

38. Four, the impact on surrounding streets and neighborhoods should also be taken very seriously into consideration. For example -- car system or a project with the police department, they find that people would bypass that street that's doing CIP projects, because they know they're going to get in trouble for speeding. They'll take alternate routes. That's what's going to happen.

**Response:** Congestion overall will be less with the Refined LPA, so traffic infiltration into neighborhoods should not increase compared to the No-Build Alternative. Also, most neighborhood streets are discontinuous and would not be used as an alternate route by through traffic. In the event a neighborhood street is impacted, there are a variety of traffic calming measures that can be used to mitigate the impacts.

39. Therefore, educating the general public, more public input, testing and re-testing before implementation is needed for a more efficient, more direct route, affordable, convenient transit system. If this is the best system, I suggest everyone connected with the BRT system use it daily to show it.

**Response:** What you are asking for can only happen by implementing the BRT system.

40. I still oppose the In-Town BRT portion of this mass transit system plan for the Primary Urban Center of Honolulu and the Island of Oahu presented in the Supplementary Draft Environmental Impact Statement

**Response:** Comment noted. No response required. It is a statement of opposition to the In-Town BRT.

41. This phase should wait till outside areas of Honolulu have their traffic congestion problems solved first before attempting to proceed with the In-Town route from Iwilei to Waikiki as proposed by City Director Soon & City Council Transportation Committee Chairperson Belnum.

**Response:** Timing and implementation of the P.M. zipper lane and related Regional BRT improvements must be coordinated with the State DOT. SDOT wants to widen the H-1 Freeway in the areas where the P.M. zipper lane is proposed before installing the zipper lane. Since the Iwilei-Waikiki segment of the In-Town BRT can be a viable improvement to the transit system immediately, the City Council has elected to proceed with this segment as the first step in phasing of the BRT system.

42. The water & sewer pipes in Honolulu have not been upgraded for years as countless number of water main pipes have broken within the last 3 years, due to wear and tear as heavier motor vehicles (trucks, buses, limousines, trucks, SUV) use the roadways. These are the very streets that the City wish to start the Bus Rapid Transit System, with no mention of upgrading the roadways before commencing with this most ambitious project.

**Response:** Efforts to coordinate utility upgrades have been initiated and will continue during final design.

43. The first priority should encompass the areas outside of Urban Honolulu, as these are the areas most affected by traffic gridlock for Monday - Friday commuters. I feel that this is where the transit plans should be implemented first.

**Response:** Timing and implementation of the P.M. zipper lane and related Regional BRT improvements must be coordinated with the State DOT. SDOT wants to widen the H-1 Freeway in the areas where the P.M. zipper lane is proposed before installing the zipper lane. Since the Iwilei-Waikiki segment of the In-Town BRT can be a viable improvement to the transit system immediately, the City Council has elected to proceed with this segment as the first step in phasing of the BRT system.

44. The time intervals between trains are very unrealistic. My main mode of transportation is riding the City Buses to my destinations. I timed 60 - 65 able bodied persons getting off the bus No. 8 Shuttle Bus between Waikiki and Ala Moana (Shopping) Center. It took 3 - 4 minutes for passengers to get off and another 4 - 5 minutes for passengers to get on the bus to travel back to Waikiki with their bags and boxes of purchases, as well as families with baby strollers and toddlers. This does not take into account handicap passenger that need extra time. The time intervals as proposed by the City & County of Honolulu of 2, 4, 6, 8 minutes during rush hour are totally unrealistic. A wheelchair rider needs 5 - 10 minutes to settle into his or her seat from the curbside loading platform. If the rush hour intervals are followed, very few passengers will be able to board or get off the trains, as the next one is right behind it. The trains will cause gridlock and not be able to keep up with the time schedule

**Response:** Boarding and alighting will be much easier with the In-Town BRT. Passengers will be able to get on-and-off from a platform that is at the same height as the bus floor (13 inches) so that there will be no steps to negotiate. Also passengers will be allowed to both enter and leave from any of 2 or 3 doors on the articulated buses. Passengers in wheelchair and scooters will be able to board and alight directly without the use of a lift. Passengers with baby strollers will also find it much easier to get on-and-off the bus. The net effect of these features is that dwell time at stops will be much less than today.

Ms. Daisy M. Mural  
Page 12  
November 13, 2002

45. *The loading platforms for passengers in the middle of the streets will not be large enough to accommodate free movement for passengers with wheelchairs, baby stroller, walkers and folding shopping carts. In Japan I witnessed in certain areas that utilize boarding platforms in the middle of the streets crammed with students waiting for their buses - sometimes with barely room to spare. I shudder to think what may happen when the students are inattentive to the surrounding traffic while on the boarding platform. What happens when toddlers and children stray from their parents.*

**Response:** The in-street platforms will be a minimum of 8-feet wide, and will be 10-feet wide where possible. In most cases they will be 160-feet long which is more than ample for two BRT buses to be letting passengers on-and off simultaneously. For the passenger loads forecast there will be ample room for people to wait, to get on-and-off the buses, and to circulate freely. The in-street platforms will have 3.5-foot high sturdy safety railings along the backside of the platform which is the side adjacent to traffic. Platforms such as those proposed have been in place on light rail and BRT systems all over the World.

46. *I also see problems of jaywalkers from young to old in certain parts of Honolulu - like Downtown, Chinatown, Kapiolani Boulevard and especially in Waikiki. People are rushing to catch a certain bus, in a hurry or inattentive to the surrounding traffic. These are problems facing Honolulu presently.*

**Response:** Comment noted. In certain locations where jaywalking pose a safety hazard, measures will be taken to mitigate against it. For example, along S. King Street near Iolani Palace it is proposed to install a barrier, consisting of decorative bollards with chains connecting them, along the edge of the sidewalk next to the curb to discourage jaywalking.

47. *I'm sure that the best engineers, consultants and experienced personnel have spent countless hours of planning, preparing, cross examining to study the huge impact created by such a massive mass transit system, but public input is also crucial and vital, as these are the people who will use and be most affected by this project. Educating the public, testing and re-testing are important aspects not to be taken for granted.*

**Response:** The community involvement process for the project has been on-going since 1998 and will continue throughout project development and implementation.

48. *I suggest that all those connected with the project and those in support utilize the In-Town BRT system. Riders want the most direct route and closest to their destinations, rather than spend time waiting at transit centers for their connecting train. If the ridership is low, the fees will increase to a point many people will not be able to ride the BRT in the future. The heavy burden to maintain the BRT will fall on the tax payers of Hawaii.*

**Response:** The concept behind the hub-and-spoke system is that passengers are provided greater choices of places they can travel to, and in some cases more directly and/or faster by passing through the transit centers and transfer points. Since the bus routes will be scheduled to arrive and depart at common intervals, the amount of waiting that will be required will be substantially less than in an un-coordinated system.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6876. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 523-4528 • Fax: (808) 523-4750 • Internet: www.cc.honolulu.gov



CHERYL D. SOON  
DIRECTOR  
GEORGE KESOMI MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00605

APR 20 2002

Ms. Cheryl Soon  
Director  
Department of Transportation Services  
City and County of Honolulu

Dear Ms. Soon,

There has been a lot of controversy opposing the Bus Rapid Transit program. However, there are more positive than negative.

Our community needs the benefits that this plan will bring us. The positive gains are shorter commutes, less auto traffic in the future, and in this time of economic uncertainty, more jobs and investment in the community.

I am in support of all efforts for this!

Thank you,

Kevin Nakamoto

November 13, 2002

Mr. Kevin Nakamoto  
3138 Waialae Avenue, #1104  
Honolulu, Hawaii 96816

Dear Mr. Nakamoto:

Subject: Primary Corridor Transportation Project

This is in response to your April 20, 2002 letter regarding your comment on the Supplemental Draft Environmental Impact Statement (SDEIS).

*There has been a lot of controversy opposing the Bus Rapid Transit program. However, there are more positive than negative. Our community needs the benefits that this plan will bring us. The positive gains are shorter commutes, less auto traffic in the future, and in this time of economic uncertainty, more jobs and investment in the community. I am in support of all efforts for this!*

Response: Thank you for supporting the project.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director



APR 20 2002

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR  
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JEREMY HARRIS  
MANAGER

Ms. Cheryl Soon, Director  
Department of Transportation Services  
City and County of Honolulu

Dear Ms. Soon,


I understand that there has been a lot of controversy opposing the Bus Rapid Transit program. I personally agree with what you are trying to accomplish and support you throughout.

With this plan it will solve majority of the major concerns the communities have right now as far as commute and traffic problems. It not only will eliminate a 1.5 hour drive, but will bring additional jobs and money to Hawaii.

This is a perfect start to what will become a safer more abundant environment to the communities/businesses as well as tourism with the growth of West Oahu. I know that a lot of planning, research and investment have gone into this system and I commend you for this great effort.

I am in support of all your efforts.

Thank you,



CHERYL D. SOON  
DIRECTOR

GEORGE MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00606

November 13, 2002

Ms. Stacey K. Namihara  
1519 Nuuanu Avenue, #161  
Honolulu, Hawaii 96817

Dear Ms. Namihara:

Subject: Primary Corridor Transportation Project

This is in response to your April 19, 2002 letter regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. I understand that there has been a lot of controversy opposing the Bus Rapid Transit program. I personally agree with what you are trying to accomplish and support you throughout.

Response: Thank you for supporting the BRT project.

2. With this plan it will solve majority of the major concerns the communities have right now as far as commute and traffic problems. It not only will eliminate a 1.5 hour drive, but will bring additional jobs and money to Hawaii.

Response: The BRT project is one component of the transportation system that will give commuters an alternative to driving their cars and will result in additional jobs for project construction and operation.

3. This is a perfect start to what will become a safer more abundant environment to the communities/businesses as well as tourism, with the growth of West Oahu. I know that a lot of planning, research and investment have gone into this system and I commend you for this great effort.

Response: We appreciate your insight into the effort involved in planning a project of this magnitude.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director



# Public Comment Form

## Primary Corridor Transportation Project

### Island of Oahu, Hawaii

The information you provide on this form will help the C & C of Honolulu and the Federal Transit Administration in the future planning of the Primary Corridor Transportation Project. We appreciate any comment you may have. Comments must be postmarked or received by November 6, 2000.

Name: Kim Nichols  
 Representing: Self  
 Address: 1346 Mauai St  
Kailua, HI 96734  
2086379

Please make any comments below:

- ① PM 2.5 pollution maybe cumulative the more dangerous pollutant. Please address this in the final EIS.
- ② Concerning the Kailua TSM + BRT programs and perhaps the no-build the nature of the neighborhood transit center, & please flesh it out more. Please include, where it might be, if there is a shelter how will it be? how many people will use it? how many people will be encouraged in Kailua!! Note: tourism is not to be encouraged in Kailua!!

5.42 Not editors OF THE WEEK

### Panel Backs EPA and 'Six Cities' Study

The Environmental Protection Agency (EPA) has won a major victory in the fierce battle over its tough new standard for particulate air pollution. Dealing a sharp blow to critics from industry, a bipartisan research group has reviewed key data that EPA relied upon to set that standard and has come out firmly behind the agency. Although all scientific debate isn't over, the reanalysis "puts to bed many of the concerns that critics have raised" 3 years ago, states John Vandenberg, an EPA environmental scientist.

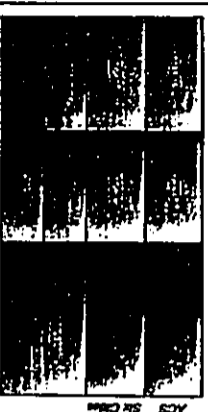
The group was EPA's 1997 decision to extend its regulation from particles 10 micrometers or less in size to include a mere 2.5 micrometers or less across (PM<sub>2.5</sub>). EPA based its decision largely on two controversial studies that linked these tiny particles, released mainly by motor vehicles and power plants, to higher death rates.

In the Six-Cities study, Harvard researchers examined the relation between levels of PM and sulfate (a component of fine particles) and death rates among more than 8000 people in six U.S. cities, following them for 14 to 16 years. The American Cancer Society (ACS) study followed over 500,000 people in 154 cities for 8 years. Both found a slight rise in death rates from heart and lung disease in cities with higher levels of PM<sub>2.5</sub>, although the mechanism remains unclear.

Based largely on the ACS death count, EPA calculated that the benefits of curbing PM<sub>2.5</sub> to 65 µg/m<sup>3</sup> over 24 hours would far outweigh the multibillion-dollar costs.

After EPA proposed the standard in 1996, the American Petroleum Institute (API) and other industry groups blasted the two studies. Some scientists also argued in congressional hearings that the apparent link might result from other air pollutants, a less healthy lifestyle in dirtier cities, or other confounding factors. Industry groups tried to block the new regulations. A federal court decided that the science was sound but threw out the rules based on legal arguments, which will be heard by the Supreme Court this fall. At the same time, skeptical industry groups and some lawmakers demanded that the Harvard researchers turn over their raw data. The researchers refused, saying that subjects' confidentiality would be breached.

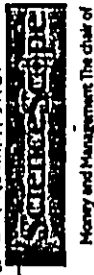
To resolve the scientific and data-sharing issues, Harvard turned to the nonprofit Health Effects Institute (HEI) in Cambridge, Massachusetts. HEI assembled an expert panel to reanalyze both studies. In a report released last week, that panel concluded that the association between PM<sub>2.5</sub> and excess mortality is real. The team, led by statistician Daniel Krewski of the University of Ottawa, replicated the studies from original data sets and got essentially the same results: slightly higher death rates in the dirtier cities (see table). The team probed the data for more than 30 possible confounders, from altitude to health services, and tested the link "in nearly every possible manner" with various analytical techniques. The results still held.



Confirmation. Reanalysis yielded results almost identical to the original studies: a rise in death rates of 28% (in the ACS study) and 16% (in the ACS study) from cleanest to most polluted city.

Bill Frick, an attorney with the API, agrees that the reanalysis has "eliminated some of the uncertainty." Another major epidemiology study released by HEI that looked at daily PM levels and deaths in 90 cities has also cleared up earlier doubts (Science, 7 July, p. 23). But Frick argues that researchers still need to figure out which component of PM<sub>2.5</sub> causes harm and hence what problem needs to be fixed—power plants or diesel trucks, for instance. A slew of new federally funded research is addressing those questions and will feed into EPA's assessment of PM<sub>2.5</sub> in case this fall. Until EPA decides whether to adjust the standard next year, it won't ask states to comply with the regulations.

Meanwhile, the legal struggle over access to research data continues. In the wake of the controversy, Congress in 1998 passed a law, sponsored by Senator Richard Shelby (R-AL), mandating that federally funded researchers release their raw data if requested under the Freedom of Information Act. To the relief of scientific groups, the White House interpreted the law narrowly, limiting it to grants awarded after fall 1999 and only to data used to support regulations. The U.S. Chamber of Commerce threatened to sue to broaden that interpretation and began the process by filing requests last December for the Harvard data. So far, EPA has refused to turn over the data because the study predates the law. Keith Holman, an attorney with the Chamber of Commerce, says the group hasn't yet decided whether to litigate the case. —JOCELYN KASIR



### Money and Management

The chair of the House Science Committee, James Sensenbrenner (R-WI), is worried that the National Science Foundation (NSF) might receive too much of the first-dept's share of the second. However, the department's bill to reauthorize NSF's programs that it would mark up H.R. 4901, a 3-year blueprint for NSF to replace one that expires next month. It's the committee's fourth stab this year at a reauthorization bill (Science, 2 June, p. 1564). But Sensenbrenner pulled the bill, citing his failure to reach an agreement on how to respond to "ethical lapses at NSF."

Sensenbrenner is increased at the agency's response to a government finding that Luther Williams, former head of education programs, improperly accepted outside honoraria, and he has written into the bill a tough new ethics program. But Democrats and NSF officials believe the language is unnecessary. Sensenbrenner also objects to proposed language that would double NSF's budget over 5 years, saying it would undermine his party's credibility with appropriators.

### Going to Sea

Drawing on research showing that superchargers and other big ships are a major source of air pollution (Science, 31 October 1997, p. 823), two California-based environmental groups are pushing the Environmental Protection Agency (EPA) to clamp down on the problem. Lawyers with the Earth Justice Legal Defense Fund are negotiating with EPA to settle a lawsuit that calls for tougher control on supercharging vessels, the Bluewater Network said last week.

In a 17 July report (www.bluewaternetwork.org), the network notes that big ships typically use high-sulfur fuels that produce prodigious amounts of sulfur and nitrogen oxides and particulate matter. The lawsuit, filed last February on the network's behalf, challenges EPA plans to regulate the emissions through an international agreement. The group says EPA's plan is unenforceable and would allow emissions to increase by 13% by 2030. EPA officials, however, predict that tougher U.S. rules would cause captains to sail to other ports to refuel.

Contributors: David Malachoff, Michael Belter, Jeffrey Harris

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SCIENCE VOL 289 4 AUGUST 2000

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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE WENDT • MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD02-00607

Ms. Kim Nichols  
1246 Mowal Street  
Kaliua, Hawaii 96734

Dear Ms. Nichols:

Subject: Primary Corridor Transportation Project

This is in response to your October 12, 2000 Public Hearing comment form and oral testimony at the October 12, 2000 Public Hearing regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. *PM<sub>2.5</sub> pollution maybe cumulatively the more dangerous pollutant. Please address this in the final EIS.*

**Response:** All air pollutants are described in Section 3.5 of the FEIS.

2. *Concerning the Kaliua TSM and BRT programs (2-18) (2-11) (and perhaps the no-build) where it might be; if there is a shelter how will it be; Koolauoko development plan is too growth; how will redevelopment occur; how many feeder buses. Note: Tourism is not to be encouraged in Kaliua!*

**Response:** Community-based planning will be used for identifying the site and design of the Kaliua/Kaneohe transit center(s). The transit center(s) in Kaliua/Kaneohe will be planned and designed in accordance with the Koolauoko Sustainable Communities plan.

3. *I'd like to make some comments about things that are not included in the DEIS. And one of them is in the air quality concerns in chapter - or Section Three. The ten micron and below particle - particulate matter is of interest now. It is a big deal. And therefore, I hope that will be included in the Final EIS.*

**Response:** The project area and State of Hawaii is in compliance with the National Ambient Air Quality Standards for PM-10.

4. *Along those lines, it doesn't seem that these hybrid vehicles or the electric or hybrid vehicles are included in any of the No-Build program or the TSM program, and they could*

Ms. Kim Nichols  
Page 2  
November 13, 2002

*easily be phased in and, thereby, the decrease in air pollution also be included in those things. Please include them, if you can, in the Final EIS, and there in the financial benefits and environmental benefits.*

**Response:** For purposes of the EIS, the transit technology provided in the No-Build Alternative and the TSM Alternative are minibuses and 40-foot standard and articulated buses. While minibuses could use alternative fuel sources, including electric batteries or propane, standard and articulated buses, particularly the ones used on long-haul routes, would need to be diesel or hybrid diesel/electric because of the mountainous terrain and limited range of battery-powered vehicles. However, the EIS does not preclude alternative technologies from being considered in the future.

5. *Finally, in Kaliua - and I'm representing myself. In page 218 in - they talk about the neighborhood transit centers, and I just hope that that can be fleshed out a little bit in the final, especially where they are going to be.*

**Response:** Planning and design of the Kaliua/Kaneohe transit centers are proceeding as separate projects from the BRT and will include community input.

6. *If there is lane changes, how does that -- it says -- talks about redevelopment around these centers in Section 714.*

**Response:** Along with serving existing transit needs, one of the other goals of the PCTP is to help shape growth in the corridor. The reason why there is development potential around transit centers is due to the high pedestrian traffic in and around these centers.

7. *And how is that going to affect the area, especially in the Koolauoko Development Plan, if it is in agreement with the Koolauoko Development Plan?*

**Response:** The proposed project would not affect the objectives and implementation of the adopted Koolauoko Sustainable Community Plan.

8. *And, you know, how many feeder buses will there be? Is there going to be more buses? And can these buses be electric? Are all the opportunity costs going to be lost? I don't think so, if we can include those electric buses in the other sections.*

**Response:** More feeder buses, both in terms of routes and frequency of service, are proposed. Alternative propulsion systems are being studied.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover, if you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY WARDEN  
LAWYER



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GEORGE YECOO MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00612

November 13, 2002

Mr. Bill Peizer  
1420 Victoria Street, #1304  
Honolulu, Hawaii 96822

Dear Mr. Peizer:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (MISDEIS).

1. *I'm a resident in the state since 1965, and I wish to write in summary opposition to the subject project, to which I will come immediately.*

Response: Comment noted.

2. *I'd like to thank Midweek magazine for calling my attention to something that, in spite of my long residence and in spite of public hearings, has never come to my attention before. And I just never knew anything like this ever existed. And that doesn't stand too well to speak of for the media generally in Oahu.*

Response: The community involvement for the project has been active since 1998 and will continue throughout design and implementation.

3. *And for lack of investigative reporting, one of the big information we do not have at our disposal to consider today is what politicians and their contributors stand to profit from this project, this billion dollar project, this thousand million dollar project.*

Response: Comment noted.

4. *According to the plan, of course, by experience, we know that it will cost at least twice as much before they complete it. Then it's going to take about \$4,000 for every man, woman and child of the - the population on this island. About \$12,000 for every three-person family.*

Response: Comment noted.

5. *And let no one tell us that somebody else is going to pay for this, because no matter, whether this money comes from the City or from the State or from the Federal, it's our tax money.*

Response: Comment noted. Chapter 6 discusses the financial aspects of the project.

Mr. Bill Peizer  
Page 2  
November 13, 2002

6. *Lastly, on the project itself, I see that the project was projected for 2025. Our roads are already moving parking lots. 2025, a quarter century from now. And every two weeks, a shipload of new cars come in, and the parking lots in the staging areas on Sand Island are filled with thousands of cars that are not on the road yet. In another quarter century, there will be no road space available for buses or for cars or anything.*

Response: The planning horizon is consistent with Federal Transit Administration guidelines.

7. *So what are the solutions? Well, I feel there are two things we need. One, we need a limitation of the cars, number of cars, on the island, a system by which, for every new car that comes aboard, we have to have certainty that an existing vehicle becomes permanently out of circulation to make space for it. There is no other way.*

Response: It is beyond the project scope to analyze a system that prohibits new cars on the road without an existing vehicle being permanently removed from the roadways.

8. *And as for public transportation, there is no other way, but to get it off the road, to get a central corridor based on a monorail-type system. I know this is going to cost money. But since monorails do not have to stop for traffic and for red lights, every seat on the monorail easily covers about, let's say, a couple of dozen or so seats that exist on buses.*

Response: A grade separated system was rejected at the outset by the public and City Council as being too costly and unsightly. Selection of a Locally Preferred Alternative has already been made.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

**Richard J. Port**  
1600 Ala Moana Blvd. #3100  
Honolulu, Hawaii 96815  
Tel 808-941-9624  
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e-mail port001@hawaii.rr.com

October 12, 2000

Sheryl Soon, Director  
Dept. of Transportation  
City & County of Honolulu

Dear Ms. Soon,

This is to express my opposition to the MIS-DEIS for the Primary Corridor Transportation Project.

I want first, however, to express my appreciation to you and to the City and County of Honolulu for the effort in attempting to help citizens coming to Honolulu from the west end of Oahu. I want also to express my appreciation for the effort to inform the public of the draft plan and to engage the community in a dialogue regarding transportation matters.

My opposition to the plan involves several issues:

1. the need for dedicated lanes within urban Honolulu is not demonstrated. Frankly, the current use of buses within urban Honolulu is satisfactory and flexible. Dedicated lanes will not eliminate the need for local buses in the remaining lanes since express stops will be relatively far apart.
2. the use of Kapiolani Boulevard for two dedicated lanes, with local buses also using the Kapiolani corridor will make it virtually impossible to get automobiles up and down Kapiolani Boulevard and will impact negatively on businesses on the Boulevard.
3. the current underuse of the articulated express buses along Kapiolani Boulevard does not bode well for the future occupancy of a rapid transit system. I have requested, but have not received from the Department of Transportation, ridership figures for individual express buses that the city and county is currently using.
4. The MIS-DEIS overstates the anticipated ridership and understates the anticipated cost of the system.
5. the proposed transit plan will negatively impact traffic going north/south or south/north. Since traffic signals will be synchronized to allow buses/trains to change the traffic signals, the traffic heading towards the mountains or ocean - already a significant problem during rush hours - will be adversely impacted.

In summary, the proposed system, using dedicated mass transit lanes, is not necessary, will create major problems for automobile traffic within urban Honolulu and will fail any reasonable test for cost benefit analysis.

Sincerely,

*Richard Port*

Richard Port

**Richard J. Port**  
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October 17, 2000

Cheryl Soon, Director  
Dept. of Transportation  
City & County of Honolulu  
711 Kapiolani Blvd. Suite 1200  
Honolulu, HI 96813

Testimony in Opposition to the Major Investment Study-Draft Environmental Impact Statement

Dear Ms. Soon,

Before expressing my opposition to the MIS-DEIS for the Primary Corridor Transportation Project, I want first to express my appreciation to you and to the City and County of Honolulu for the effort in attempting to help citizens coming to Honolulu from the west end (Iwa, Milliani, etc.) of Oahu. I want also to express my appreciation for the effort to inform the public of the draft plan and to engage the community in a dialogue regarding transportation matters.

My opposition to the plan involves several issues:

1. the need for dedicated lanes within urban Honolulu has not been demonstrated. Frankly, the current use of buses within urban Honolulu, is both satisfactory and flexible. Since express stops will be relatively far apart (1/4 to 1/2 mile), dedicated lanes will not eliminate the need for local buses using the remaining undedicated lanes.
2. the use of Kapiolani Boulevard for two dedicated lanes, with local buses also using the Kapiolani corridor will make it virtually impossible to get automobiles up and down Kapiolani Boulevard and will impact negatively on businesses on the Boulevard. The MIS-DEIS needs to address the current automobile capacity of Kapiolani Boulevard and the projected reduction in automobile capacity after the dedicated lanes are built and local buses are added. Specifically, what happens to those who must use their automobiles (salespersons, delivery servicepersons) in the downtown Honolulu corridor during the day.
3. the current underuse of the articulated express buses along Kapiolani Boulevard does not bode well for the future occupancy of a rapid transit system. I have requested, but have not received from the Department of Transportation, ridership figures for individual express buses that the city and county is currently using.
4. the current bus system, using articulated buses, is capable of expanding ridership exponentially without dedicated/restricted lanes.
5. the MIS-DEIS overstates the anticipated ridership and understates the anticipated cost of the system. According to the city's own figures, total bus ridership is now the lowest

since 1979 despite an increase in the number of buses from 350 to 525 during this time and an increase in population. All of the ten U.S. cities that are the most intensive users of public transportation, including Honolulu, have experienced significant per capita ridership declines in the 1980-1998 period. Eight of the ten have rail lines, and still they decline.

6. the proposed transit plan will negatively impact traffic going north/south or south/north. Since traffic signals will be synchronized to allow buses/trains to change the traffic signals going east/west, the traffic heading towards the mountains or ocean - already a significant problem during rush hours - will be adversely impacted.
7. the MIS-DEIS does not take into account the changing work habits anticipated over the next 25 years. Specifically, more people are working out of their homes and are expected to spend fewer hours at their offices.

In summary, the proposed system, using dedicated mass transit lanes, is not necessary, will create major problems for automobile traffic within urban Honolulu and will fail any reasonable test for cost benefit analysis.

Sincerely,

*Richard Port*  
Richard Port

**Richard J. Port**

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November 14, 2000

Duke Bainum, Chair  
Committee on Transportation  
Honolulu City Council  
530 South King Street  
Honolulu, HI 96813

Testimony in Opposition to Resolution 00-249 - Selection of a Locally Preferred Alternative for the Primary Corridor Transportation Project

Dear Council Member Bainum:

I have attached my testimony to Ms. Cheryl Soon dated October 17, 2000 which provides pertinent information and concerns regarding the draft Environmental Impact Statement for this mass transit project.

It is surprising to me that this committee and the Honolulu City Council would consider moving to support this project without analyzing my concerns and the concerns of hundreds of our citizens who have responded to the draft Environmental Impact Statement. Why the rush? Why aren't we waiting for a new draft of the EIS which would attempt to respond to the concerns raised by our community, including neighborhood boards, business groups and individual citizens?

The urban core portion of the plan, with the proposed dedicated lanes, is an attempt to enforce social engineering on our community. Specifically, it appears to force citizens out of their cars, even those who must use their cars for business or personal use. Even those senior citizens who currently use our bus system will be impacted because they will have to walk long distances between the new transit stops, or wait to transfer to local buses which will have to move up and down the same streets.

The dedicated lanes within the urban core are unnecessary. Our traffic problems do not involve the area from downtown Honolulu to Waikiki or the University. Our traffic problems involve getting people from Mililani and Ewa and the Leeward coast to urban Honolulu. That is the problem that the City Council needs to address.

I urge your committee to obtain a revised EIS, responsive to citizens concerns before moving this matter to the full council.

Sincerely,

*Richard Port*

Richard Port

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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE NEGRO • LUKAJA MOTTO  
DEPUTY DIRECTOR

TPD10/00-05263R

November 13, 2002

Mr. Richard J. Port  
1600 Ala Moana Boulevard, #3100  
Honolulu, Hawaii 96815

Dear Mr. Port:

Subject: Primary Corridor Transportation Project

This is a combined response to your comments on the Supplemental Draft Environmental Impact Statement (MISDEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your MISDEIS comments and Part B responds to your SDEIS Comments.

Part A - MISDEIS Comments

1. *I would like to ask, however, that the City immediately release its current ridership for each of the bus routes and each of the buses and make that available. I realize that it's about paper but at least a copy somewhere where it can be looked at.*

**Response:** Available ridership data for the current bus system was sent to you. Also, the FTA National Transit Database has ridership information on-line. The FTA's web address is [www.fta.dot.gov](http://www.fta.dot.gov).

2. *But the problem I have with BRT is the problem that we have in traffic is not so much from downtown to the University or downtown to Waikiki. I can drive faster from downtown to Waikiki or University faster than I go from the ocean to the H-1 on any of the four areas. I don't have time to explain but basically it takes longer to go North/South.*

**Response:** There is no question that it is slower traveling mauka/makai than it is traveling Ewa/Koko Head whether you are in a bus or an auto. The PCTP focuses on east/west routing because this is the dominant direction of travel and where there are a sufficient number of buses to warrant conversion of lanes for priority use by buses. During planning for BRT buses and the hub-and-spoke conversion in the PUC, opportunities for bus priority treatments on mauka/makai streets will be identified.

3. *This plan, BRT now, calls for buses to be able to change the lights to green going East/West which is only going to back up the traffic North/South and make it worse than it is.*

**Response:** Traffic impacts are addressed in Chapter 4 of the FEIS. Traffic signals will not be pre-empted by the BRT. At certain intersections, BRT vehicles approaching a green signal will activate a 4 to 10-second extension of the green indication for that cycle only. BRT vehicles stopped at a red signal will move concurrently with the through traffic in the same direction, unless

Mr. Richard J. Port  
Page 2  
November 13, 2002

the BRT vehicle must turn or change lanes, in which case it will be given a 4 to 10-second green signal in advance of the general purpose traffic lanes. All traffic signal extensions and advance indications will be timed in the field during actual operation to minimize adverse effects on general traffic flow.

4. *Kapiolani Corridor. I don't understand how you're going to take away the lanes there and have reasonable traffic on Kapiolani Boulevard. And I don't understand why people would want to come from Maunaloa or Makiki all the way down to Kapiolani. If you're going to do this and I'm against doing it. But if you're going to do BRT, I would think you'd be using King Street and Beretania instead of Kapiolani. People would not have to go as far.*

**Response:** There would continue to be very frequent bus service along King and Beretania Streets with the Refined LPA. The reason the In-Town BRT alignment is proposed on Kapiolani Boulevard is to serve major generators such as Ala Moana Center and the Convention Center, as well as to help shape growth at the large vacant parcels and underutilized properties in Kakaako and Ala Moana.

5. *But I don't believe these cost figures. Maybe it's a little bit like the big dig in Boston. For those of you who are familiar those were supposedly inspected cost by Congress. But frankly were never right in the beginning. And I don't believe these cost figures are right.*

**Response:** Comment noted.

6. *Also, it doesn't take into account...if we're talking about 2025, really, more people are working out of their homes and will continue to increase the number of people... Just last night I sent an e-mail from here to Belfast from my house and came back in the morning to me. I had the response already.*

**Response:** The concept of telecommuting has been discussed for decades and yet has had no noticeable impact on travel demand to date. Even if telecommuting increases significantly in the future it would not eliminate the need for the Refined LPA. Instead it would help flatten the peaks.

7. *This is to express my opposition to the MISDEIS for the Primary Corridor Transportation Project*

**Response:** Comment noted. It states the commenter's preference for an LPA.

8. *First, the need for dedicated lanes within urban Honolulu has not been demonstrated. Frankly, the current use of buses within urban Honolulu is satisfactory and very flexible. Dedicated lanes will not eliminate the need for local buses in the remaining lanes since we've been told express stops will be one-quarter to one-half mile apart. Meaning, there will have to be local buses on additional lanes.*

**Response:** The Refined LPA is comprised of a mix of exclusive BRT, semi-exclusive BRT and mixed-use lanes. The BRT system strives to strike a balance between transit speed and impacts to general traffic. In segments where it was judged that roadway capacity was needed for general traffic and the BRT operation would not be significantly affected, exclusive lanes were replaced by either semi-exclusive or mixed-flow operation. In areas of high BRT ridership volumes that would be affected by congestion, exclusive transit lanes were retained such as on Dillingham Boulevard and on Hotel Street.

The In-Town BRT is only one element of the transit plan for the Primary Urban Center. The plan also includes conversion of the bus system to a hub-and-spoke network which consists of new local circulator routes, as well as continuation of many existing line haul and express routes. All existing bus routes will be evaluated for re-routing to intersect with the BRT at or near the proposed BRT stops. Some local service will also be retained on streets where the BRT will operate, so that riders will have an option of higher speed, limited stop service, or slower speed service with more frequent stops. The goal is to have an integrated network of transit services that provide convenient and cost-effective options for potential users.

9. Two, the use of Kapiolani Boulevard for two dedicated lanes, with local buses also using the Kapiolani corridor, will make it virtually impossible to get automobiles up and down Kapiolani Boulevard and will impact negatively on businesses on the boulevard. The MISDEIS needs to address the current automobile capacity of Kapiolani Boulevard and the projected automobile capacity after the dedicated lanes are built and local buses are added.

**Response:** Year 2025 intersection operations based on the Oahu Regional Transportation Plan traffic forecasts are projected to operate within capacity with the exception of the Kapiolani/Alukson intersection. This intersection is influenced by congestion at the Kapiolani/Kalaheua intersection, which is projected to be congested, with or without the BRT. These analyses include the effect of local buses which will be decreased in number when the BRT is fully implemented.

10. Number three, the current underuse of the articulated express buses along Kapiolani Boulevard does not bode well for the future occupancy of a rapid transit system. I have requested, but have not received from the Department of Transportation, ridership figures for the individual express buses that the City and County is currently using. The current bus system using articulated buses can increase ridership exponentially without dedicated restricted lanes. I question the statement in the media presentation that we cannot increase the people-carrying capacity of our articulated buses.

**Response:** Ridership on the existing CityExpress routes is only partially indicative of the ridership potential of the In-Town BRT. The In-Town BRT will operate at much closer intervals, at faster speeds and greater reliability due to priority lanes, raised platforms, loading from multiple doors with pre-payment of fares, and signal priority at selected locations.

11. Number four, the MISDEIS overstates the anticipated ridership and understates the anticipated cost of the system.

**Response:** Comment noted.

12. And finally, five, the proposed transit plan will negatively impact traffic going north/south or south/north. Since traffic signals will be synchronized to allow buses/trains to change the traffic signals going east and west, the traffic heading towards the mountains or the ocean, already a significant problem during rush hours, will be adversely impacted.

**Response:** Traffic signals will not be pre-empted by the BRT. At certain intersections, BRT vehicles approaching a green signal will activate a 4 to 10-second extension of the green indication for that cycle only. BRT vehicles stopped at a red signal will move concurrently with the through traffic in the same direction, unless the BRT vehicle must turn or change lanes, in which case it will be given a 4 to 10-second green signal in advance of the general purpose traffic lanes.

All traffic signal extensions and advance indications will be timed in the field during actual operation to minimize adverse effects on general traffic flow.

13. And in summary, the proposed system, using dedicated mass transit lanes, is not necessary, will create major problems for automobile traffic within urban Honolulu and will fail any reasonable test for cost benefit analysis.

**Response:** The Refined LPA proposed reallocation of general-purpose lanes for transit is the only reasonable way to achieve greater person carrying capacity in the future. The Refined LPA Alternative will provide an attractive, dependable, affordable alternative to the private automobile.

Using cost-effectiveness measures prescribed by the FTA, the Refined LPA scores much better than the No-Build and TSM Alternatives.

14. This is to express my opposition to the MISDEIS for the Primary Corridor Transportation Project.

**Response:** Comment noted. It states the commenter's preference for an LPA.

15. The need for dedicated lanes within urban Honolulu is not demonstrated. Frankly, the current use of buses within urban Honolulu is satisfactory and flexible. Dedicated lanes will not eliminate the need for local buses in the remaining lanes since express stops will be relatively far apart.

**Response:** See response to comment #8.

16. The use of Kapiolani Boulevard for two dedicated lanes, with local buses also using the Kapiolani corridor will make it virtually impossible to get automobiles up and down Kapiolani Boulevard and will impact negatively on businesses on the Boulevard.

**Response:** See response to comment #9.

17. The current underuse of the articulated express buses along Kapiolani Boulevard does not bode well for the future occupancy of a rapid transit system. I have requested, but have not received from the Department of Transportation, ridership figures for individual express buses that the City & County is currently using.

**Response:** See response to comment #10.

18. The MISDEIS overstates the anticipated ridership and understates the anticipated cost of the system.

**Response:** Comment noted.

19. The proposed transit plan will negatively impact traffic going north/south or south/north. Since traffic signals will be synchronized to allow buses/trains to change the traffic signals, the traffic heading towards the mountains or ocean -- already a significant problem during rush hours -- will be adversely impacted.

**Response:** See response to comment #12.

20. In summary, the proposed system, using dedicated mass transit lanes, is not necessary, will create major problems for automobile traffic within urban Honolulu, and will fail any reasonable test for cost benefit analysis.

**Response:** See response to comment #13.

21. Before expressing my opposition to the MISDEIS for the Primary Corridor Transportation Project, I want first to express my appreciation to you and to the City and County of Honolulu for the effort in attempting to help citizens coming to Honolulu from the west end (Ewa, Milliani, etc.) of Oahu. My opposition to the plan involves several issues.

**Response:** Comment noted. It states the commenter's opinions.

22. The need for dedicated lanes within urban Honolulu has not been demonstrated. Frankly, the current use of buses within urban Honolulu, is both satisfactory and flexible. Since express stops will be relatively far apart (1/4 to 1/2 mile), dedicated lanes will not eliminate the need for local buses using the remaining undedicated lanes.

**Response:** See response to comment #8.

23. The use of Keolu Boulevard for two dedicated lanes, with local buses also using the Keolu corridor will make it virtually impossible to get automobiles up and down Keolu Boulevard and will impact negatively on businesses on the Boulevard. The MISDEIS needs to address the current automobile capacity of Keolu Boulevard and the projected reduction in automobile capacity after the dedicated lanes are built and local buses are added. Specifically, what happens to those who must use their automobiles (salespersons, delivery servicepersons) in the downtown Honolulu corridor during the day.

**Response:** See response to comment #9.

24. The current underuse of the articulated express buses along Keolu Boulevard does not bode well for the future occupancy of a rapid transit system. I have requested, but have not received from the Department of Transportation, ridership figures for individual express buses that the City and County is currently using.

**Response:** See response to comment #10.

25. The current bus system, using articulated buses, is capable of expanding ridership exponentially without dedicated/restricted lanes.

**Response:** Although the existing bus system has the capacity to expand, the buses would have to continue to operate in mixed traffic. The Reformed LPA provides a mix of exclusive BRT, semi-exclusive BRT and mixed-use lanes. The BRT system will attract new riders by providing a faster more reliable service by offering limited stop operations in bus priority lanes.

26. The MISDEIS overstates the anticipated ridership and understates the anticipated cost of the system. According to the City's own figures, total bus ridership is now the lowest since 1979 despite an increase in the number of buses from 350 to 525 during this time and an increase in

population. All of the ten U.S. cities that are the most intensive users of public transportation, including Honolulu, have experienced significant per capita ridership declines in the 1980-1998 period. Eight of the ten have rail lines, and still they decline.

**Response:** The travel forecasts for the Primary Corridor Transportation Project were developed using travel forecasting procedures developed for the Oahu Metropolitan Forecasting Model Development Project. These procedures simulate the choices made by residents, business, and visitors regarding the nature, number, mode, time-of-day, and geographic orientation of trips that they make on a typical weekday. The procedures have been developed with data obtained in extensive surveys of Oahu households, transit riders, and all passengers. Future year forecasts reflect the population and employment forecasts that have been prepared by DBEDT and the zonal allocations that have been prepared by the City Department of Planning and Permitting.

The travel forecasting methodology and resulting travel forecasts used for the Primary Corridor Transportation Project are described in the FEIS Chapter 4. The transportation plan for Oahu is described in the Oahu Metropolitan Planning Organization's report, Transportation for Oahu Plan TOP 2003.

Overall transit ridership is growing at a faster rate than other modes of transportation. According to the American Public Transportation Administration, public transit ridership has grown for six consecutive years, reaching new record levels. This growth in transit ridership outpaced growth of the population and highway use.

Honolulu's specific experience shows that ridership responds to the implementation of faster, more convenient service. CityExpress and CountyExpress routes were created to provide limited-stop express service along Honolulu's busiest corridors. Ridership along these three routes has grown dramatically, and comments from the public demonstrate the appeal of faster bus service.

Other transit systems in major U.S. cities have proven that rapid bus systems attract greater ridership. For example, implementation of the Metro Rapid BRT system in Los Angeles resulted in increases in ridership of 33% and 26% along the two BRT corridors.

Furthermore, any decision to move forward with transit improvements cannot be based solely on historical ridership statistics. Future plans for transit are made in anticipation of critical issues in the coming years and decades, including: increasing population growth, increasing need for alternative modes of transportation among various segments of the population, growing concern about air pollution caused by automobiles, increasing costs to consumers of parking and gasoline, and limited land and budget availability that prevents further expansion of roads. To address these impending issues, the City has chosen to move forward to make transit a more appealing and effective choice for the future.

27. The proposed transit plan will negatively impact traffic going north/south or south/north. Since traffic signals will be synchronized to allow buses/trains to change the traffic signals, the traffic heading towards the mountains or ocean -- already a significant problem during rush hours -- will be adversely impacted.

**Response:** See response to comment #12.



28. The MIS/DEIS does not take into account the changing work habits anticipated over the next 25 years. Specifically, more people are working out of their homes and are expected to spend fewer hours at their offices.

**Response:** The concept of telecommuting has been discussed for decades and yet has had no noticeable impact on travel demand to date. Even if telecommuting increases significantly in the future it would not eliminate the need for the BRT. Instead it would help flatten the peaks.

29. In summary, the proposed system, using dedicated mass transit lanes, is not necessary, will create major problems for automobile traffic within urban Honolulu, and will fail any reasonable test for cost benefit analysis.

**Response:** See response to comment #13.

30. It is surprising to me that this committee and the Honolulu City Council would consider moving to support this project without analyzing my concerns and the concerns of hundreds of our citizens who have responded to the draft Environmental Impact Statement. Why the rush? Why aren't we waiting for a new draft of the EIS which would attempt to respond to the concerns raised by our community, including neighborhood boards, business groups and individual citizens?

**Response:** The City Council has followed procedures in accordance with NEPA and FTA guidelines. Selection of the Locally Preferred Alternative occurred based on the MIS/DEIS and input received from public oral and written testimony. Responses to comments received on the MIS/DEIS are contained in the FEIS.

31. The urban core portion of the plan, with the proposed dedicated lanes, is an attempt to enforce social engineering on our community. Specifically, it appears to force citizens out of their cars, even those who must use their cars for business or personal use. Even those senior citizens who currently use our bus system will be impacted because they will have to walk long distances between the new transit stops, or wait to transfer to local buses which will have to move up and down the same streets.

**Response:** Congestion is forecast without the BRT. The BRT rather than forcing anyone to use it tries to attract users by offering an alternative that can move independent of the congested lanes. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes. Senior citizens will not be giving up anything, they will be gaining the choice of using the BRT or continuing to use local buses.

32. The dedicated lanes within the urban core are unnecessary. Our traffic problems do not involve the area from downtown Honolulu to Waikiki or the University. Our traffic problems involve getting people from Māhāni and Ewa and the Leeward coast to urban Honolulu. That is the problem that the City Council needs to address.

**Response:** Traffic congestion exists in town as well as along the H-1 and H-2 corridors, and is projected to only get worse in the future. That is why there is an In-Town BRT as well as a Regional BRT component in the Refined LPA.

33. I urge your committee to obtain a revised EIS, responsive to citizens concerns before moving this matter to the full council.

**Response:** See response to comment #30.

34. Finally, you opposed the In-Town BRT as the Locally Preferred Alternative (LPA) at the November 14, 2000 Special Transportation Committee Meeting.

**Response:** Comment noted. It states your preference for an LPA.

#### Part B - SDEIS Comments

35. I oppose the City's current plan for BRT.

**Response:** Comment noted. Thank you for attending the public hearing.

36. To be fair, the City has a very good bus system. It has been getting better with the introduction of articulated buses, and it can be improved. I would be happy to provide the City with some ideas, although I doubt that they would be accepted.

**Response:** Comment noted.

37. The bad news is the BRT plan is too expensive. Property taxes will be increased significantly. To believe otherwise, I have a mountain at the end of Waikiki that I'm putting up for sale tomorrow.

**Response:** Comment noted.

38. Furthermore, the plan is based on false philosophical principles of social engineering, that people will use buses or trams and get out of their cars. I was fascinated by the comment that was made by the previous speaker on the early - and I attended some of those meetings - "it's going to make it easier to drive. Win-win." In fact, I was told by the head of the Transportation Department that, in fact, this was not social engineering. But in the last six months or a year, it's come out. So what we were told originally is not true. It is social engineering. It is to force people out of their cars.

**Response:** Comment noted. The MIS/DEIS, SDEIS, and FEIS Chapter 1 state the purposes of the Primary Corridor Transportation Project as:

1. Increase the people-carrying capacity of the transportation system in the primary transportation corridor by providing attractive alternatives to the private automobile.
2. Support desired development patterns.
3. Improve the transportation linkage between Kepoel, which is envisioned to be the "Secondary Urban Center" of Oahu, and Honolulu's Urban Core.
4. Improve the transportation linkages between communities in the Primary Urban Center (PUC) to increase the attractiveness of in-town living.

39. About 15 years ago, the public, you and I, as property taxpayers, paid for the improvements in Kakaako. We were told, at that time, that the purpose for the improvements in Kakaako was that low income and middle income housing would be built there so that the workers in Waikiki would be close to their jobs, they wouldn't have to use - come long distances with the bus system. It was a lie. Now that was a State lie. But what we have here is a system that is being prepared for us that is going to be very, very expensive.

Mr. Richard J. Port  
Page 9  
November 13, 2002

Miyamoto, Faith

From: Hameyasu, Toru  
Sent: Tuesday, October 31, 2000 10:41 AM  
To: Miyamoto, Faith  
Subject: DEIS Comment

Response: Comment noted. No response required.

40. *And, in summary, let me say this. It's a very unusual thing to see a former chairman of the Democratic Party, a progressive one, come use the L word, agreeing with the Libertarian Party chair, who couldn't be farther apart. But we agree on this. This is the wrong plan.*

Response: Comment noted. No response required.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 627-6876. We appreciate your interest in the project.

I suppose this is a formal comment to the DEIS.

Glen Robinson (202) Kakeia St. Hon. 96822) called at 10:30 AM, 10/31/00.

He thinks an elevated rail or highway would avoid condemnation of the property along Dillingham Blvd. He was concerned about the TV news report last night where a lady being interviewed stated the BRT proposal may condemn her business on Dillingham.

Sincerely,



CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
660 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE 'KEOU' MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00613

November 13, 2002

Mr. Glen Robinson  
2021 Kakela Street  
Honolulu, Hawaii 96822

Dear Mr. Robinson:

Subject: Primary Corridor Transportation Project

This responds to your October 31, 2000 phone conversation with the City and County of Honolulu Department of Transportation Services regarding your comment on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

*An elevated rail or highway would avoid condemnation of the property along Dillingham Blvd. Concerned about the TV news report last night where a lady being interviewed stated the BRT proposal may condemn her business on Dillingham.*

Response: No businesses are proposed to be condemned along Dillingham Boulevard with any of the Alternatives.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

October 19, 2000

RECEIVED

Oct 20 3 24 PM '00

O'ahu Transit Services Inc

Dear *Members of Transportation Committee,*  
CITY CLERK  
HONOLULU, HAWAII

I am writing to give feedback regarding the new hub-and-spoke bus system, which started on Sept. 1. In its present form, the system has many negative aspects, in my opinion. First of all, why do the buses travel on our side street (Lumiauu) when they could easily stay on Kamehameha Hwy and turn right into Waikale via Lumiaua, a much wider four lane thoroughfare? Why must the buses come every 30 minutes starting from 5 a.m. and ending at 11:15 p.m. every day, including weekends? This is not downtown Honolulu!

Monday through Friday, most of our residents go to sleep early in order to get up early, yet loud, almost empty buses travel Lumiauu until 11:15 p.m. Furthermore, most of our residents enjoy "sleeping in" on Saturday morning, yet loud, nearly empty buses travel Lumiauu as early as 5 a.m. This is unacceptable!

Please don't force me to go door to door in Waikale with a petition demanding the City and County of Honolulu modify the hub-and-spoke system such that Lumiauu be returned to a bus free zone. Your prompt response to this matter is greatly appreciated.

Most Sincerely,

*Patrick Rorie (586-3657)*

Patrick Rorie, President -- Ho'omaka Village Board of Directors

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
600 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE WECHE • KURUMOTO  
DEPUTY DIRECTOR

TPD02-00614

November 13, 2002

Mr. Patrick Rorie  
Page 2  
November 13, 2002

Mr. Patrick Rorie  
94-870 Lumiauau Street, Apt. X202  
Waipahu, Hawaii 96797

Dear Mr. Rorie:

Subject: Primary Corridor Transportation Project

This is in response to your October 19, 2000 letter and your oral testimony at the October 19, 2000 Special Transportation Committee Meeting regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. I am writing to give feedback regarding the new hub-and-spoke bus system, which started on Sept. 1. In its present form, the system has many negative aspects, in my opinion.

Response: Comment noted.

2. First of all, why do the buses travel on our side of the street (Lumiauau) when they could easily stay on Kamehameha Hwy and turn right into Waikale via Lumiala, a much wider four-lane thoroughfare?

Response: This is not an issue for the PCTP. Your comment has been referred to the planners of the current hub-and-spoke conversion at DTS.

3. Why must the buses come every 30 minutes starting from 5 a.m. and ending at 11:15 p.m. every day, including weekends? This is not downtown Honolulu!

Response: See response to comment #2.

4. Monday through Friday, most of our residents go to sleep early in order to get up early, yet loud, almost empty buses travel Lumiauau until 11:15 p.m. Furthermore, most of our residents enjoy "sleeping in" on Saturday morning, yet loud, nearly empty buses travel Lumiauau as early as 5 a.m. This is unacceptable!

Response: See response to comment #2.

5. Please don't force me to go door to door in Waikale with a petition demanding the City and County of Honolulu modify the hub-and-spoke system such that Lumiauau be returned to a bus free zone. Your prompt response to this matter is greatly appreciated.

Response: See response to comment #2.

6. I'm not anti-bus. We have one of the best bus systems in the country. It's vital that we continue to use the bus system to help transport people. However, based on its present form, the hub and spoke bus system, I'm opposed to it unless changes are made.

Response: See response to comment #2.

7. The reason being, starting in September 1, I couldn't help but notice...I live in a condo near Lumiauau Street, which is a side street in Waikale, and I couldn't help but notice that there's this bus, No. 433. It just seem to come every 30 minutes from like 5 a.m. to 11:15 p.m. And I think to myself, you know, I live in Waikale and there are pros and cons to that. But one thing, you know, downtown Honolulu one thing you want to get away from in this type of situation with the bus. And, so, I just couldn't help but notice that. The reason I bring up the times are because the key like for the 11:15 p.m., you know, most of our residents have to go to bed fairly early to fight the traffic the next morning. And so, for this bus to be coming at 11:15 p.m., it seems awfully late in the evening when we're trying to sleep. And, again, my windows are open. Others have air conditioners. Five a.m. on Saturday morning? I mean, again, we're trying to sleep in at least Saturday or Sunday. Would be nice to sleep in a couple days a week. And at 5:00 a.m. this bus comes in and it's pretty... The newer ones are quieter but it's still a nuisance. Also, the buses are pretty much empty.

Response: See response to comment #2.

8. Also on Saturday and Sunday, we have soccer games going on in the park near my condo and the vehicles line up parked all along Lumiauau and so I'm not sure where the buses are stopping to let people off. Maybe in the middle of the street. That doesn't seem very safe.

Response: See response to comment #2.

9. And then, finally, it just seems like this bus could go into ... Instead of turning onto our side street, it could get on to Lumiala which is a four-lane thoroughfare. That much makes a lot more sense.

Response: See response to comment #2.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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CHERYL D. SOON  
DIRECTOR  
GEORGE NEGORO IYAMOTO  
DEPUTY DIRECTOR

TPD002-00615

November 13, 2002

Ms. Ann Ruby  
55 S. Kukui Street  
Honolulu, Hawaii 96813-2328

Dear Ms. Ruby:

Subject: Primary Corridor Transportation Project

This is in response to your testimony at the April 20, 2002 public hearing regarding comments on the SDEIS.

1. *And I took your bus to get here this morning.*  
**Response:** We appreciate you taking the time to attend the public hearing and for using TheBus.
2. *I have spent considerable time in Portland, Oregon; Seattle, Washington; and Vancouver, British Columbia. Each has its own different rapid transit system.*  
**Response:** Comment noted.
3. *Portland has a bus rapid transit. It is not rapid, it has to stop at all the cross streets, and it takes up too much road space. Only those with lots of time ride it. It's faster to drive.*  
**Response:** Comment noted.
4. *According to the plan, of course, by experience, we know that it will cost at least twice as much before they complete it. Then it's going to take about \$4,000 for every man, woman and child of the - the population on this island. About \$12,000 for every three-person family.*  
**Response:** Comment noted.
5. *Seattle has their one little monorail put up for the World's Fair in 1962 from downtown to Seattle Center. But many people ride it, not only tourists. It is fast, clean, quiet and efficient. Seattle area is thinking more monorails.*  
**Response:** Comment noted.
6. *Seattle did build a very expensive bus tunnel, a rail rapid bus tunnel, but they are apparently scrapping this idea now.*  
**Response:** The Seattle bus tunnel is in operation.

Ms. Ann Ruby  
Page 2  
November 13, 2002

7. *Vancouver, British Columbia, has what they call the SkyTrain, and it was built, I think, originally 1988 for the World's Fair, and it has the SkyTrain bus hub system. It's extremely efficient. It's non-invasive to roads, and they are expanding them, and it's a well-run system.*  
**Response:** Comment noted.
8. *To me, clearly, BRT is not the way to go. I don't want to see buses running every two minutes up and down Kalakaua or any street.*  
**Response:** Comment noted.
9. *I have been a bus rider since 1989, but I must say that this BRT is very unfair to cars.*  
**Response:** Comment noted.
10. *I think the words "Bus Rapid Transit" is an oxymoron, because buses, by nature, are not rapid.*  
**Response:** Comment noted.
11. *I would rather see a nice, thin, sleek, trim, quiet monorail system built above the existing roadways, with no interference to cars. And each station could have a bus. And that system has worked very well in Vancouver, British Columbia, and it's a good system.*  
**Response:** Comment noted. It is a statement regarding preference for monorail.

We appreciate your interest in the project.

Sincerely,  
  
CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU  
650 SOUTH KING STREET, 3RD FLOOR  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE YEOKI MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD02-00616

Mr. Harrison Rue  
2902B Kalawao Place  
Honolulu, Hawaii 96822

Dear Mr. Rue:

Subject: Primary Corridor Transportation Project

This is in response to your testimony at the October 26, 2000 Special Transportation Committee Meeting regarding comments you made on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. *I'm speaking in support of the city's unprecedented effort to find a workable cost effective environmentally friendly solution to our island's transportation needs. And I believe the current Bus Rapid Transit proposal meets those needs.*

Response: Comment noted. Thank you for supporting the project.

2. *At the end of that public process, I'm remembering that there was a half a dozen key elements that came out. We've heard some of them talked about tonight. One of the things that didn't come up tonight is over 25% of our island residents are elders or kids or disabled. Can't drive. So, we're looking at meeting their needs.*

Response: The Refined LPA provides an attractive transportation option to the non-driving community.

3. *We need to look at moving people, not cars. There was strong consensus at all the meetings that we can't continue to just widen roads downtown. So, this does something else. And, the consensus at the end of round four, by those several thousands people, was that preserving the priority lanes for transit with the effective signal preference, pedestrian circulator buses connections would give us the most bang for the buck.*

Response: Comment noted. Again, thank you for supporting the project.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6876. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE YEOKI MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD02-00617

Mr. William Samaritano  
1778 Ala Moana Boulevard  
Honolulu, Hawaii 96815-1605

Dear Mr. Samaritano:

Subject: Primary Corridor Transportation Project

This is in response to your testimony at the April 20, 2002 public hearing regarding comments on the SDEIS.

1. *I'm a resident of Waikiki for over 21 years, and I am against this Bus Rapid Transit, if you can call it rapid transit.*

Response: Thank you for attending the public hearing and expressing your views.

2. *Back in 1990, Kevin Costner starred in the film called "Field of Dreams," in which he played an Iowa farmer who kept hearing voices that told him, "If you build, he will come." The film was called "Field of Dreams," and the voices Kevin kept hearing told him to build a baseball field in the middle of this cornfield in Iowa. Now, being Hollywood, everything worked out in the end, and everyone lived happily ever after. Now, I'm sure you're wondering what this "Field of Dreams" has to do with BRT. Well, I think the same forces are at work here with our City officials. I think they are hearing voices similar to those, saying, "If you build it, they will use it." This type of thinking may work great for Hollywood, where things exist in the fantasy world. However, this type of thinking is a disaster for the real world, no matter how well-intentioned.*

Response: Comment noted.

3. *A recent example of this well-intentioned thing is the defunct van cam project, a project which started out with the best of intentions, trying to keep speeders and motorists who speed off our streets. What the people of Honolulu have ended up with is a project that is going to cost taxpayers millions of dollars, money we do not have.*

Response: Comment noted.

4. *So you have to ask yourself, Why build BRT? A project many people will admit and have said that will create major traffic jams, turn our main thoroughfares into parking lots.*

Response: It is not the conversion of lanes that will create the congestion. The congestion for motorists will be there without the BRT. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

DEPARTMENT OF TRANSPORTATION SERVICES  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE "KEO" MIYAMOTO  
DEPUTY DIRECTOR

TPD002-00618

November 13, 2002

Mr. Donald Samuel  
98-099 Uao Place  
Aiea, Hawaii 96701

Dear Mr. Samuel:

Subject: Primary Corridor Transportation Project

This is in response to your testimony at the October 19, 2000 Special Transportation Committee Meeting regarding your comment on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

*"I'm just here as a resident of Lele Pono. And due to the congestion, the atmosphere and the congestion that is there now it's just too much. And based on that, I think we need another location."*

Response: The former Kamehameha Drive-In site is no longer being considered for a transit center.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

Mr. William Samaritano  
Page 2  
November 13, 2002

5. Our City officials have this notion that they can make us use this thing and get out of our cars by making it inconvenient for us to use our cars. The "if they build it, they will use it" syndrome.

Response: Comment noted. The MIS/DEIS, SDEIS, and FEIS Chapter 1 state the purposes of the Primary Corridor Transportation Project are not to force people out of their cars by making it inconvenient for them, but to:

1. Increase the people-carrying capacity of the transportation system in the primary transportation corridor by providing attractive alternatives to the private automobile.
2. Support desired development patterns.
3. Improve the transportation linkage between Kapolei, which is envisioned to be the "Secondary Urban Center" of Oahu, and Honolulu's Urban Core.
4. Improve the transportation linkages between communities in the Primary Urban Center (PUC) to increase the attractiveness of in-town living.

6. Traffic is already bad, and yet people still not - still do not use the existing bus system as much as they should, a bus system that has received many national awards for being one of the best in the country.

Response: It will not require a major shift of people from autos to transit for the Refined LPA to have a positive impact on reducing congestion while giving transit riders significant benefits. By 2025 the Refined LPA is projected to attract an additional 2 percent of the auto drivers on to transit than would have occurred with the No-Build Alternative.

7. Solutions? Let's expand on this nationally honored system. Why try and reinvent the wheel? Let's do like what the gentleman suggested earlier. Turnouts for the existing bus system, better left- and right-turn lanes. Why rebuild the wheel? Why try and force us out of cars? Something we know is not going to happen.

Response: Bus turnouts will be added along sections of Dillingham Boulevard and Kuhio Avenue. Bus turnouts are not a complete solution in and of themselves.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 5th FLOOR  
HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE YEOH • IYUAMOTO  
DEPUTY DIRECTOR

TPD02-00619

November 13, 2002

APR 20 2002

4/20/02

Ms. Cheryl Soon, Director  
Department of Transportation  
City & County of Honolulu

Dear Ms. Soon,

Hawaii needs to develop a modern, efficient public transportation system, and this project is the perfect solution.

I am in support of the work and input that the community has contributed towards developing the Bus Rapid Transit system. I look forward to the future traffic relief this will bring!

Thank you,

Noel Sario

Mr. Noel Sario  
91-151 Makalea Street  
Ewa Beach, Hawaii 96706

Dear Mr. Sario:

Subject: Primary Corridor Transportation Project

This is in response to your April 20, 2002 letter regarding your comment on the Supplemental Draft Environmental Impact Statement (SDEIS).

*Hawaii needs to develop a modern, efficient public transportation system, and this project is the perfect solution. I am in support of the work and input that the community has contributed towards developing the Bus Rapid Transit system. I look forward to the future traffic relief this will bring!*

Response: Thank you for supporting the project.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director



DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE KEONI IMAIYAMOTO  
DEPUTY DIRECTOR

TPD02-00620

APR 20 2002

April 18, 2002

Ms. Cheryl Soon, Director  
Department of Transportation Services  
City & County of Honolulu

Dear Ms. Soon:

I am in favor of the proposed Bus Rapid Transit (BRT) program. It is clear to me that without building new roads and more parking lots, traffic will continue to get worse with more driving delays and more congestion, pollution, road rage, accidents and deaths. I don't have to be a traffic expert to figure that out. I think that those against any kind of mass transit system are short sighted, ignorant or have some sort of selfish motivations against it. More roads and parking lots are not what the people want. Therefore, the only answer to traffic problems seems to be some sort of mass transit, which the BRT is one of.

The BRT is a great start for introducing a mass transit program to Hawaii. It will help the people of Hawaii to take a first big step toward mass transit with minimal effort. We already have and use similar type buses and we have the roadways on which to run on. The rest are enhancement facilities which will make it attractive to riders and a plan to organize the operation. Simple.  
The math is also very simple. The more riders on the BRT, the less cars on the road. Simple.

Warren T. Sato

November 13, 2002

Mr. Warren T. Sato  
1306 Kina Street  
Kaliua, Hawaii 96734

Dear Mr. Sato:

Subject: Primary Corridor Transportation Project

This is in response to your April 18, 2002 letter regarding comments on the SDEIS.

1. I am in favor of the proposed Bus Rapid Transit (BRT) program. It is clear to me that without building new roads and more parking lots, traffic will continue to get worse with more driving delays and more congestion, pollution, road rage, accidents and deaths. I don't have to be a traffic expert to figure that out. I think that those against any kind of mass transit system are short sighted, ignorant or have some sort of selfish motivations against it. More roads and parking lots are not what the people want. Therefore, the only answer to traffic problems seems to be some sort of mass transit, which the BRT is one of.

Response: Thank you for supporting the BRT project.

2. The BRT is a great start for introducing a mass transit program to Hawaii. It will help the people of Hawaii to take a first big step toward mass transit with minimal effort. We already have and use similar type buses and we have the roadways on which to run on. The rest are enhancement facilities which will make it attractive to riders and a plan to organize the operation. Simple.

Response: We concur.

3. The math is also very simple. The more riders on the BRT, the less cars on the road. Simple.

Response: Again, thank you for supporting the BRT project.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director



**PRIMARY CORRIDOR TRANSPORTATION PROJECT**  
 Island of Oahu, Hawaii  
**SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT (SDEIS)**

The information you provide on this form will help the City & County of Honolulu and the Federal Transit Administration in the future planning of the Primary Corridor Transportation Project. We appreciate any comment you may have. Comments must be postmarked or received by May 7, 2002.

Name: ARUN SAVARA  
 Representing: SELF  
 Address: 610 WIND DR  
HONOLULU HI 96821

Please make any comments below:

BETTER PUBLIC TRANSPORTATION  
NEEDED, BUT BUILDING BRT WILL NOT  
ATTRACT RIDERS UNLESS PARK AND  
RIDE PARKING PROBLEMS ARE PROVIDED -  
FOR CARS WITH BICYCLES AND USE DENSE  
SERVICE (BUSINESS VEHICLES) LIKE TAXI  
DONT RESERVE LANES FOR EMPTY BUSES

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
 450 SOUTH KING STREET, 3RD FLOOR  
 HONOLULU, HAWAII 96813  
 Phone: (808) 525-4238 • Fax: (808) 521-4730 • Internet: www.cc.honolulu.gov



CHERYL D. SOON  
 DIRECTOR  
 GEORGE NAKOJI  
 DEPUTY DIRECTOR

TPD02-00621

November 13, 2002

Ms. Janis Sauter  
 P.O. Box 216  
 Aiea, Hawaii 96701

Dear Ms. Sauter:

Subject: Primary Corridor Transportation Project

This is in response to your testimony at the October 19, 2000 Special Transportation Committee Meeting regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MISDEIS).

1. *But, I guess, as a registered nurse I have great concerns about the fumes and the pollution that will be caused by the center at Kam. With prevailing winds, pollution comes straight towards our condominium, towards our project. Pollution is one of my great concerns about this center being there around a residential area.*

Response: The former Kamehameha Drive-In site is no longer being considered for a transit center.

2. *Along with noise which is another great health factor. Although people don't usually see noise as a health factor.*

Response: The FTA noise criteria are based on levels that are well below the thresholds of health risks to humans. The Refined LPA alternative will not result in any severe noise impacts along the alignment. Therefore there is no health risk associated with the operational noise levels of the Refined LPA.

3. *And then, of course, traffic problems which have already been enumerated about as far as having the buses be able to control the light at Keonohi and Moanaka intersection. Traffic there already is unbelievable and if you don't believe it, come at Christmas time. It is totally unmovable at Christmas.*

Response: The transit center site at Kamehameha Drive-In and the on/off-ramp from Keonohi Street to H-1 have been eliminated from consideration.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,  
  
 CHERYL D. SOON  
 Director

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 522-4328 • Fax: (808) 522-1720 • Internet: www.zs.honolulu.gov



JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE "KEO" MIYAMOTO  
DEPUTY DIRECTOR

TPD002-00622

November 13, 2002

Mr. Arun Savara  
610 West Hind Drive  
Honolulu, Hawaii 96821

Dear Mr. Savara:

Subject: Primary Corridor Transportation Project

This is in response to your April 20, 2002 comment form regarding the Supplemental Draft Environmental Impact Statement (SDEIS).

1. Better public transportation is needed, but building BRT will not attract riders unless park-and-ride parking garages are provided.

Response: Park-and-ride garages and lots will be provided with a total of over 3,600 spaces.

2. For cars that want to use dense downtown and Waikiki areas (other than service/business vehicles) have additional usage taxed like Singapore.

Response: Congestion pricing is not part of any current plans for Oahu.

3. Don't reserve lanes for empty buses.

Response: The buses are not projected to be empty.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

October 26, 2000

The Honorable Duke Baimum, Chair  
and Committee Members  
Transportation Committee  
650 South King Street  
Honolulu, Hawaii 96813

Dear Chair Baimum and Committee Members:

RE: Support of Bus Rapid Transit

I am writing in support of the Bus Rapid Transit (BRT) alternative as outlined in the Major Investment Study/Draft Environmental Impact Statement that has been prepared for the Primary Urban Corridor Transportation Project.

The BRT alternative will make Honolulu a better, more livable city with less traffic. The costs associated with the automobile are immense. We can't continue to build more highways or double deck our freeways. Roadways and parking lots are expensive to build. Automobiles pollute the air and water. The best solution is to improve public transportation with the BRT alternative.

Bus rapid transit is greatly needed improve Honolulu's traffic congestion and to provide an alternative to cars dominating our city. I support the BRT alternative because it will provide mobility to people who choose not to own, cannot afford, or are unable to drive a car.

Mobility should not be limited only to people who can afford and operate cars. Honolulu needs to increase its transportation options, not only to decrease congestion, but to provide equal opportunity of mobility to all citizens—including children, seniors, the poor, or the disabled, or people who simply choose not to drive a car.

Thank you for considering my opinions.

Thomas Schnell

RECEIVED  
OCT 26 7 32 AM '00  
CITY CLERK  
HONOLULU, HAWAII

Thomas Schnell  
545 Queen St., #639  
Honolulu, Hawaii 96813  
(808) 526-9434

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
630 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 523-4329 • Fax: (808) 523-4700 • Internet: www.cc.honolulu.hi



JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE 'KEONI' MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00623

November 13, 2002

Mr. Thomas Schnell  
Page 2  
November 13, 2002

4. *Mobility should not be limited only to people who can afford and operate cars. Honolulu needs to increase its transportation options, not only to decrease congestion, but to provide equal opportunity of mobility to all citizens – including children, seniors, the poor, or the disabled, or people who simply choose not to drive a car.*

Response: The Refined LPA (BRT Alternative) provides an attractive, affordable transportation option to Oahu's non-driving community.

5. *I support the BRT Alternative as an alternative to give people expanded options besides the car.*

Response: Comment noted. It states your preference for a Locally Preferred Alternative.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

Mr. Thomas Schnell  
545 Queen Street, #639  
Honolulu, Hawaii 96813

Dear Mr. Schnell:

Subject: Primary Corridor Transportation Project

This is in response to your October 26, 2000 letter and your oral testimony at the October 26, 2000 Special Transportation Committee Meeting regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. *I am writing in support of the Bus Rapid Transit (BRT) alternative as outlined in the Major Investment Study/Draft Environmental Impact Statement that has been prepared for the Primary Urban Corridor Transportation Project.*

Response: Comment noted. It states the commenter's preference for an LPA.

2. *The BRT alternative will make Honolulu a better, more livable city with less traffic. The costs associated with the automobile are immense. We can't continue to build more highways or double deck our freeways. Roadways and parking lots are expensive to build. Automobiles pollute the air and water. The best solution is to improve public transportation with the BRT alternative.*

Response: Comment noted.

3. *Bus rapid transit is greatly needed improve Honolulu's traffic congestion and to provide an alternative to cars dominating our city. I support the BRT alternative because it will provide mobility to people who choose not to own, cannot afford, or are unable to drive a car.*

Response: Comment noted. It states the commenter's preference for the LPA.

**PRIMARY CORRIDOR TRANSPORTATION PROJECT**  
 Island of Oahu, Hawaii  
**SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT (SDEIS)**

The information you provide on this form will help the City & County of Honolulu and the Federal Transit Administration in the future planning of the Primary Corridor Transportation Project. We appreciate any comment you may have. Comments must be postmarked or received by May 7, 2002.

Name: CINDY SCHULTZ  
 Representing: SELF  
 Address: 5314 Oia Dr  
Honolulu HI 96821

Please make any comments below:

I am against BRT for the following  
- We can not afford to build parking spaces to  
try saving off these lanes and on what a  
driving nightmare it will be.  
- we can not afford the cost and liability  
cost other than  
the state needs to explore the program that  
is poor, puny and - education transportation  
over water etc. - we don't need more BRTS  
we have more, more and getting around now  
is a nightmare  
COST & POOR PLANNING  
stop giving for unneeded drives and getting people without  
because of the road would help.  
- I'm not against mass transit - just the plan.

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
 150 SOUTH KING STREET, 3RD FLOOR  
 HONOLULU, HAWAII 96813  
 Phone: (808) 523-4329 • Fax: (808) 523-1720 • Internet: www.dts.honolulu.gov



JEREMY HARRIS  
 MAYOR

CHERYL D. SOON  
 DIRECTOR

GEORGE "KEOKI" MIYAJI  
 DEPUTY DIRECTOR

TPD02-00624

November 13, 2002

Ms. Cindy Schultz  
 5314 Oia Drive  
 Honolulu, Hawaii 96821

Dear Ms. Schultz:

Subject: Primary Corridor Transportation Project

This is in response to your testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. We can not afford to eliminate parking spaces to force people to ride.

Response: Comment noted.

2. Try coming off these lanes and see what a driving nightmare it will become.

Response: A test of closing a lane is not a test of what will happen with the BRT, it is only a test of what happens when a lane is closed which is something everyone knows the consequences of from when lanes are temporarily closed during utility construction.

As is pointed out in Chapter 4 of the FEIS, over time there will be more than enough people diverted from autos to transit to offset the impact of converting lanes for priority use by buses. This diversion from autos will only happen once it is clear that the BRT installation is a permanent improvement, not part of some test.

What is proposed with the first branch between Iwilei and Waikiki will be a good test of the ability of BRT to attract new riders and the impacts of converting lanes in selected localities.

3. We can not afford the cost now let alone the cost overruns.

Response: This project has been developed following City Council policy to not increase taxes. The financial analysis (Chapter 6 of the FEIS) shows that no increases in existing taxes or new taxes will be required to fund the project as proposed.

**PRIMARY CORRIDOR TRANSPORTATION PROJECT**  
 Island of Oahu, Hawaii  
**SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT (SDEIS)**

The information you provide on this form will help the City & County of Honolulu and the Federal Transit Administration in the future planning of the Primary Corridor Transportation Project. We appreciate any comment you may have. Comments must be postmarked or received by May 7, 2002.

Name: ROD SCHULTZ  
 Representing: SELF  
 Address: 5314 OO DRIVE  
HONOLULU, HI 96822

Please make any comments below:  
 No. 5314 OO Drive

I am opposed to the BRT because:  
It requires tax dollars to supplement ridership costs that are better spent for public safety and infrastructure maintenance.  
If BRT ridership does not justify the cost the loss of 900 street parking spaces adversely affects small business and personal business.  
The incidence of traffic on affected streets is undiminished and will result in gridlock.  
Adversely affecting traffic around the Home Depot Costco shopping block on Balaokana street will hinder shopping. You cannot carry large packages home or groceries on a bus.  
The City's shell game surrounding the new taxes' claim is deceptive and insidious.  
Traffic congestion on Iwate highway is already bad. That highway needs to be widened not narrowed by the BRT.  
Lack of publication and notification of this project on the part of the city shows deception and removed factors on the part of the city.  
Many other cities have built BRT systems with

Ms. Cindy Schultz  
 Page 2  
 November 13, 2002

4. This state needs to improve the programs that it is poorly running now - education, transportation, sewer and water, etc. - we don't need more BIG GOV.

Response: Comment noted. No response required.

5. I am a delivery person and getting around now is a nightmare.

Response: Comment noted. No response required.

6. COST & POOR PLANNING

Response: It is unclear what this statement means.

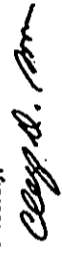
7. Stop paying for uninsured drivers and getting people without insurance off the road would help.

Response: It is beyond the scope of this project to analyze the effects of uninsured motorists.

8. I'm not against mass transit - just this plan.

Response: Comment noted. No response required.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,  
  
 CHERYL D. SOON  
 Director

*I frequently visit Waikeiki's shops, restaurants and park facilities. This requires transit. Kuhio and Kealahou Avenue. The BRT will inhibit my ability to use these services.*

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 523-4329 • Fax: (808) 523-4730 • TDD: (808) 523-4730 • www.cc.honolulu.hi.us

JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE YEKOKI MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00625

November 13, 2002

Mr. Rod Schultz  
5314 Olo Drive  
Honolulu, Hawaii 96821

Dear Mr. Schultz:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

Ms. Cheryl Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3rd Floor  
Honolulu, Hawaii 96813

1. *I'm speaking in opposition to the BRT.*

Response: Comment noted. No response required.

2. *I am in favor of rapid transit system in general, but I'm opposed to the BRT scheme.*

Response: Comment noted. No response required.

3. *I'm opposed because of the high cost to the taxpayers for a very small benefit to public transportation.*

Response: Comment noted. No response required.

4. *I'm opposed to it because of the effect on traffic along Dillingham road, Kuhio Avenue, and Kealahou in particular, roads that we in East Honolulu use frequently.*

Response: Because these are major transportation corridors, traffic demand will continue to grow. This growth in traffic would result in congestion in the future without the BRT. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

5. *It's incredible to me, with the new Home Depot on Alakawa Street and the new Costco there, that we're going to have the traffic on Nimitz and Dillingham Highways. You can't take lumber and bricks home from Home Depot on the bus.*



**Response:** It is not expected that the BRT will be able to serve every trip. There are many businesses along the alignment who will benefit from the increase in people able to access their stores.

6. *It's incredible to me that the City says that this will result in no new taxes. We're going to spend a billion dollars for the system, plus there's going to be a recurring cost to subsidize ridership, and yet we're not going to increase taxes. The money has to come from somewhere, and I guarantee it will come out of the taxpayer's pocket.*

**Response:** The financial plan provides for a project that can be paid for without an increase in taxes, using multiple revenue sources, 64 percent of which would be federal funds.

7. *Traffic on Nimitz Highway is already heavy. Diverting traffic from Dillingham to Nimitz Highway is just going to make Nimitz Highway transportation unbelievable.*

**Response:** It is not the conversion of lanes that will create the congestion. The congestion for motorists will be there without the BRT. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes. As shown in Chapter 4 of the FEIS traffic on Nimitz Highway will be less congested with the Refined LPA than with the No-Build or TSM Alternatives.

8. *I agree with the people that just found out recently about this system. I just heard about it when it was just recently publicized, had no concept of the BRT system before that time. So any idea that this is publicity - that there's been public notification or adequate public notification is incredible.*

**Response:** The community involvement for this project began in 1998 and has been the focus of numerous newspaper articles, radio shows, and television stories. There have been hundreds of meetings throughout the community where the project has been discussed.

9. *Finally, I hope that the City learns from the State's recent disaster in the cam vans and realizes that, "if this is so good for us, why do it hurt so bad?"*

**Response:** Comment noted. No response required.

10. *It requires tax dollars to supplement ridership costs that are better spent for public safety and infrastructure maintenance.*

**Response:** It is up to the City Council to determine how tax revenues are spent. Ever since the bus system was made public, each City Council has recognized that there are many members of the community who depend on public transportation for their mobility.

City Council members also recognized that it would be far more costly to widen and build new roads to accommodate bus riders if they were in autos instead.

11. *The 3.3% ridership does not justify the cost.*

**Response:** See response to comment #10.

12. *The loss of 900 street parking spaces adversely affects small business and personal business.*

**Response:** DTS is aware that the proposed elimination of on-street parking spaces is of concern to small businesses, as well as residences. As discussed in Section 4.3, in areas where a large concentration of parking spaces would be affected, replacement parking in new off-street parking facilities would be considered, but only if they meet other livable community objectives and are the result of community-based planning.

13. *The impedence of traffic on affected streets is unwarranted and will result in gridlock.*

**Response:** See response to comment #7.

14. *Adversely affecting traffic around the Home Depot/Costco shopping block on Alakawa Street will hinder shopping. You cannot carry large packages, lumber, or groceries on a bus.*

**Response:** It is not expected that the BRT will be able to serve every trip. There are many businesses along the alignment who will benefit from the increase in people able to access their stores.

15. *The City's shell game surrounding the "no new taxes" claim is deceptive and insidious.*

**Response:** Comment noted. It is a statement of opinion.

16. *Traffic congestion on Nimitz Highway is already terrible. That highway needs to be widened not narrowed by the BRT.*

**Response:** Nimitz Highway will not be narrowed by the In-Town BRT. To the contrary, the SDOT has plans to increase the capacity of Nimitz Highway by installing an A.M. peak period contra-flow lane.

17. *Lack of publication and notification of this project on the part of the City shows deception and ramrod tactics on the part of the city.*

**Response:** The community involvement process for this project began in 1998 and has been continuous since that time. The public will continue to be involved in the project throughout design and construction.



APR 20 2002

Cliff Slater

Mr. Rod Schultz  
Page 4  
November 13, 2002

April 20, 2002

Ms. Cheryl D. Soon, Director  
DEPARTMENT OF TRANSPORTATION SERVICES  
City & County of Honolulu  
650 South King Street, 3rd Floor  
Honolulu, Hawaii 96813  
(808) 523-4125

Ms. Genevieve Salmonson, director  
Office of Environmental Quality Control  
State of Hawaii  
235 South Beretania Street, Suite 702  
Honolulu, Hawaii 96813  
(808) 586-4185

Dear Ms. Soon and Ms. Salmonson:

Supplemental Draft Environmental Impact Statement

Attached are my comments on the Supplemental Draft Environmental Impact Statement (SDEIS)

Sincerely,



Att: Comments on the SDEIS.  
CDS/vm

18. Many other cities have built RT systems without impacting traffic; why can't we?

Response: See response to comment #7.

19. I frequently visit Waikiki's shops, restaurants and park facilities. This requires transiting Kuhio and Kalaniana'olani Avenue. The BRT will inhibit my ability to use these services.

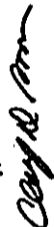
Response: See response to comment #7.

20. The In-Town BRT will provide an alternative to driving to the shops, restaurants and parks on Kuhio and Kalaniana'olani Avenues.

Response: Comment noted. No response required.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director



**Comments on the Supplemental Draft Environmental Impact Statement**

by Cliff Slater

"Political skill is the ability of foretell what is going to happen tomorrow, next week, next month and next year. And to have the ability afterwards to explain why it didn't happen." Sir Winston Churchill.

The Supplemental Draft Environmental Impact Statement (SDEIS) is deficient in failing to plan on reducing traffic congestion, failing to justify its unprecedented predictions for Bus/Rapid Transit ridership, and failing to address the many proven alternatives which have elsewhere been shown to be more effective than what the City proposes.

First, Honolulu commuters are expecting that the *Primary Corridor Transportation Project*<sup>1</sup> will give them some measure of relief from traffic congestion. Instead, the City's BRT plan predicts that traffic congestion, under the City's most optimistic BRT scenario, will be worse than it is today. The City plans to improve bus service by removing existing automobile lanes and changing them to exclusive bus lanes. In short, they will improve bus service for the 8% of commuters that use it, but only by making traffic congestion worse for the 92% of our citizens that drive.

Second, traffic congestion will be even worse than what the City projects because they will not meet their optimistic BRT ridership projections. Fewer riders will mean more cars.

Third, the serious decline in Honolulu's bus ridership over the past ten years is totally ignored in discussing projected ridership increases. Nor does the City address reasons for the long-term decline in the percentage of commuters using public transportation all over the U.S. These must be explained to make any sense of the City's projections.

Fourth, even if the City were to make its BRT budget estimates, the cost per each additional bus rider will be an outrageous \$3,700 annually. Cost overruns will increase this. There are far more effective and cost efficient projects to be adopted that will also qualify for federal funds.

Fifth, like its former rail transit plan, the City has examined none of the alternatives that have proven to work elsewhere. We shall discuss these in detail.

Sixth, the Federal Transit Administration's (FTA) name is on the SDEIS giving the impression that they have examined and approved the plan.

Ten years ago the state of Hawaii employed outside transportation experts from the nation's leading universities to critique the rail transit proposal of the time.<sup>2</sup> No such outside critique was sought for the BRT plan. However, the experts' comments on the rail transit plan are for the most part valid for today's BRT plan. We shall quote from them extensively where appropriate.

<sup>1</sup> Supplemental Draft Environmental Impact Statement: *Primary Corridor Transportation Project*. U.S. Department of Transportation and the City and County of Honolulu. March 2002. (SDEIS)

<sup>2</sup> *An Evaluation of the Honolulu Rapid Transit Development Project's Alternative Analysis and Draft Environmental Impact Statement*. Hawaii Office of State Planning and University of Hawaii. May 1990.

**One: Traffic congestion will get worse**

"...the primary benefit of rapid transit is not the reduction of automobile congestion. Rapid transit's primary benefit should be to substantially increase mobility for transit-dependent commuters."

Executive Summary, *Evaluation of the Honolulu Rapid Transit Development Project's A/DEIS*. Hawaii Office of State Planning. February, 1991.

You would think that when the City discusses *Improving Urban Mobility*, they mean reducing traffic congestion. They do not. What the city means is improving service for bus riders—at the expense of drivers. Here's what the plan says:

- "While greatly improving transit service and person carrying capacity, the ... BRT ... would result in a somewhat reduced Level of Service<sup>3</sup> for automobile traffic within the urban core."<sup>4</sup>
- "The ... BRT ... would provide more person carrying ability ... by reallocating roadway lanes from general ... use to transit or ride-share use."<sup>5</sup>
- "Due to their use of exclusive transit lanes, BRT vehicles could pass freely through congested intersections even though intersection LOS for the general-purpose lanes might be poor. The result would be less delay for transit riders and better transit schedule reliability."<sup>6</sup>

It is easy to figure out why traffic will get worse; many streets will have existing lanes turned into auto-free exclusive BRT lanes. Below are rush hour photos of affected City streets. Note that on Kapiolani Boulevard four lanes are going one-way into town. These will be reduced to just two lanes. Dillingham Boulevard presently has three lanes coming into town one-way in the morning; it will be reduced to ONE! See the SDEIS pp. 2-21 & 2-22 for a list of all the many streets that will lose lanes.

The City did not see fit to carry over existing congestion levels for 1995 for comparison purposes from the DEIS. However, table 1.2-9 on page 1-18 of the DEIS may be compared to table 4.2-3 on page 4-14 of the SDEIS to see that overall traffic congestion in the future with BRT is projected to be worse than today. Improving public transportation is unlikely to have any beneficial effects on traffic congestion. See Appendix I for comments on the 1992 rail plan's likely impact on traffic congestion by some of the nation's leading transportation experts. And bear in mind as you read them that grade-separated rail was obviously a better candidate for traffic congestion relief than BRT.

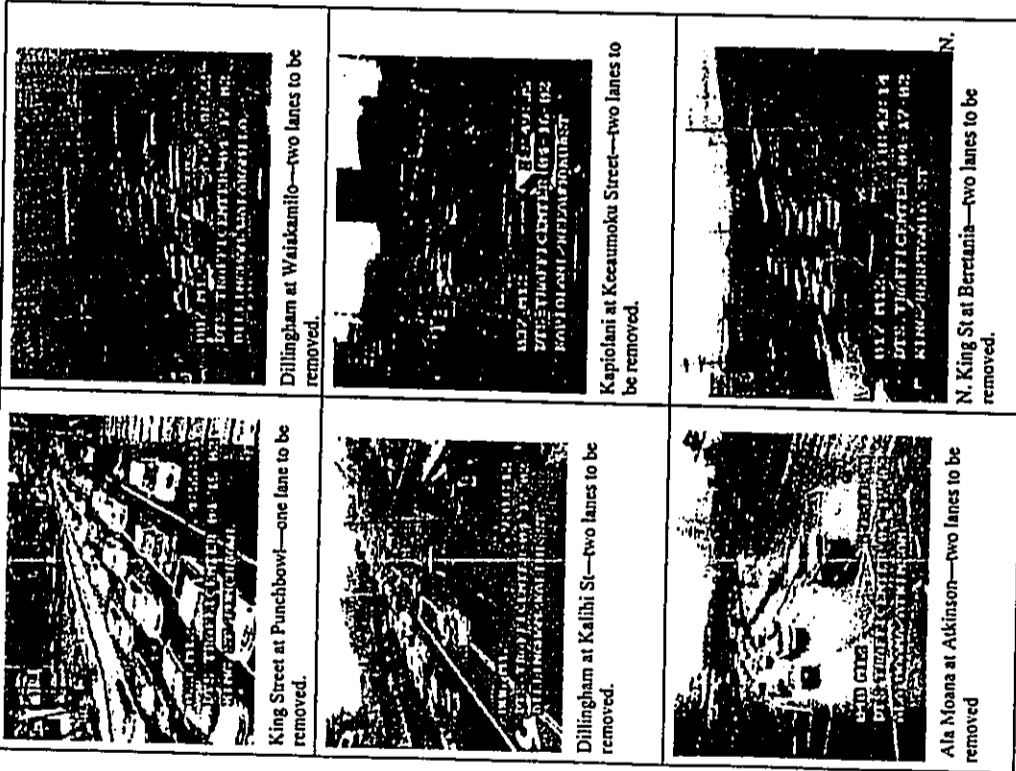
You can easily imagine what all this reduction in rush-hour road space will do to traffic. Review the photos on the page following.

<sup>3</sup> Level of Service (LOS) is a measurement of traffic congestion conditions from A to F with A being the best and F being totally congested.

<sup>4</sup> SDEIS, S-8.7.

<sup>5</sup> SDEIS 4-11.5

<sup>6</sup> SDEIS 4-20.5



**Two: Congestion will be even worse if the City's ridership forecasts are too optimistic:**

Are the City's ridership forecasts believable? Let us review their earlier forecasts.

- The HART plan forecast in 1980 that if the City did nothing beyond already planned road improvements and merely expanded the bus system, ridership would increase to 100 million annually by 1995.<sup>7</sup> In fact, by 1995 ridership was only 73 million—a 37% over estimation.
- Subsequently, the Hali 2000 study, predicted in 1984 that if the City did nothing special beyond what they had already committed to, bus ridership would increase to 85 million riders by 2000.<sup>8</sup> However, actual bus ridership of 66.6 million for 2000 was less than it had been at the time of the prediction. Thus, this was a 22% over estimation.
- Subsequently, in 1992 the City forecast, for their rail transit plan, a 21% increase in ridership from 1991 to 2005<sup>9</sup> if they did nothing special.<sup>10</sup> So far, we have seen an 8.5-13% DECREASE.<sup>11</sup> Even if ridership does not decline further by 2005, it will be a 32%+ over estimation.

Now the City is forecasting that, once again, if we do nothing special, there will be 286,700 daily bus trips in 2025<sup>12</sup> against 1991 trips of 206,650, a 39% increase. However, since 1991 we have had this decline in ridership and so, to make their forecast, they will need to increase simple, regular bus ridership 54%.

Now remember that this decline in ridership for 1991-2000 has occurred despite a 5% increase in Oahu's population and more buses in use—from 475<sup>13</sup> to 525.<sup>14</sup> And ridership is still declining as of the latest publicly available data of September 2001.<sup>15</sup>

Given the above it is impossible to believe that the City will actually make anything like a 54% increase.

On top of the "No Build" forecast the City wants us to believe that the BRT will boost this to 336,700 daily transit trips<sup>16</sup> vs. 206,650 trips in 1991 (about 186,000 today).<sup>17</sup>

<sup>7</sup> Transit Coalition for Honolulu. *The Hart Book*. 1981.

<sup>8</sup> The daily data of 274,000 was changed to annual to allow comparisons.

<sup>9</sup> Final Environment Impact Statement. 4-10.7

<sup>10</sup> This is the so-called No-Build Alternative, defined as those eight roadway projects already committed for in the next two years, and expansion of bus service for areas planned for development.

<sup>11</sup> *State Data Book 2000*. Table 18.24. See also Appendix III.

<sup>12</sup> SDEIS, Table 7.1-2

<sup>13</sup> 1993-4 State Data Book

<sup>14</sup> 2000 State Data Book

<sup>15</sup> American Public Transportation Association statistics to September 2001.

<sup>16</sup> SDEIS 7-6. These are linked trips, which is to say, from departure point to destination regardless of transfers. This is different from what the City normally reports which is boardings. If you transfer once on your way to your destination it will count as two boardings. Typically, for the system overall, there are

<sup>17</sup> 16% more boardings than trips.

<sup>18</sup> SDEIS 4.5.4.

No city in the U.S. has experienced such an increase in public transportation no matter what they have done—rail transit, busways or anything else—once they were past the initial government takeovers and subsequent massive deficits of the 1970's.

One can begin to understand why many University of Hawaii specialists in economics and forecasting wrote the City Council in 1992 about its then rail transit plan, saying, "We have little faith in the projected ridership and cost figures."<sup>18</sup>

One can also understand the outpouring of criticism from the state's own distinguished experts on the flaws in the ridership projections (see Appendix D). One of them was Dr. Moshe Ben-Akiva, Turner Professor of Civil Engineering at MIT, and a forecasting colleague of Nobel Prize winner, Professor Daniel L. McFadden. Ben-Akiva said of the 1992 exercise, "I question the validity of the forecasting procedure..." and "I am not convinced that any of the models is transferable to other situations and I would recommend not to use them without further testing." And "Any forecasting exercise of this nature would be associated with significant uncertainties."

One of the recommendations that came out of the U.S. Dept. of Transportation's review of the highly flawed rail transit forecasting of the 1970s and 1980s was that planners should "acknowledge that uncertainty in achieving any specific level of predicted ridership levels exists," and should, "be conveyed simply by expressing forecast ridership for each alternative as a range rather than a single point value."<sup>19</sup>

What should give us pause is that City forecasts for the last 30 years have been consistently in error and in the same range of 30%+ as those experienced elsewhere. Yet this latest forecast of BRT ridership, the 336,700 riders projected for 2025, is shown to the nearest hundred. This conveys to the reader a certainty to the nearest 3/100ths of one percent, a ridiculous claim.

The best way to test forecasting models is to backtrack. You go back to the 1984 data from the Hail 2000 study and use it in your model to forecast for 2001. Then go back to the 1992 data from the rail transit FEIS and again forecast for 2001. If the forecasts match the actual outcome then your model *might* have a chance of being right about the future. Certainly if a model cannot even backtrack, it should not even be considered when risking taxpayers' monies. This has not been done.

### Three: The long-term declines in ridership must be explained

"Since the entire justification for the project rests on significant rates of electing public transportation over the private automobile, the failure to discover what would influence this choice may be a serious flaw." Dr. Canam. *Evaluation of the Honolulu Rapid Transit Development Project's A/DEIS*. Hawaii Office of State Planning. February, 1991.

World War II aside, the per capita use of public transit peaked in Hawaii (and the U.S.) in the early 1920's when the automobile began to compete with streetcars and buses. It continued declining until World War II when it then rose sharply with the introduction of gas rationing. At war's end, when rationing ended, the decline continued again until reaching its all time low in 1971.<sup>20</sup> At that time, the City socialized the then profitable bus system.<sup>21</sup>

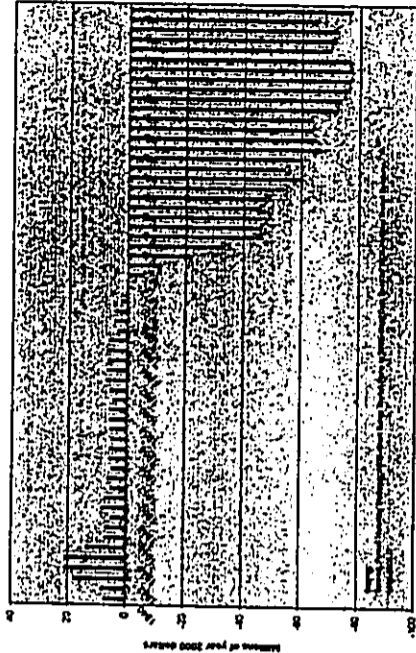
<sup>18</sup> University of Hawaii faculty members. *Memorandum to Members of the Council, City & County of Honolulu*, November 7, 1991.

<sup>19</sup> Picirell, Don H. *Urban Rail Transit Projects: Forecast Versus Actual Ridership and Costs*. U.S. Dept. of Transportation, October 1990, p. 74.

<sup>20</sup> Total annual transit rides, divided by population, or per capita transit use, is what used to be called the *riding habit*. In the days of privately operated public transportation it was considered the key indicator of

Once the City took over, it poured money into new routes to the suburbs, up the hillsides, and around the island. With new buses and new routes, transit use rose again—albeit this time at a heavy cost to the taxpayer. In 1984 the per capita transit use peaked once more and then began another decline that has continued for the last 16 years.

Profit & Loss for HRT/The Bus



The principal causes of the decline in public transportation use are well-known and well documented. The choices we make between public transportation and automobile are primarily functions of changes in real incomes, commuting costs and service availability.

As real (net of inflation) incomes increase, people tend to use public transportation less. Public transportation service is one of what economists technically refer to as *inferior goods*—those goods and services that the more income you have, the less you want them.<sup>22</sup> Thus, over the long term, increases in incomes work against transit ridership.

When real automobile commuting costs decline, people tend to use automobiles more. Conversely, increases in auto costs drive people to public transportation. When service availability declines, such as less frequent bus service, people tend to switch to automobiles.

For example, in Honolulu proper in 1920 we had 17 million transit rides with a population of just 82,000—a riding habit of 207—and solidly profitable. By 1998 the area covered had expanded to the whole of Oahu and we had 71 million riders but a population of 872,500—a riding habit of 81. (see chart below.) See Appendix V for chart.

<sup>21</sup> See *Annual Report for 1971*, Honolulu Rapid Transit Co. Ltd.

<sup>22</sup> UCLA's Professor George Hilton pointed this out in 1967 saying, "...an increase of one percent in family income will typically reduce the family's use of rail passenger service by 0.6 percent. Thus, rail passenger trains provide an inferior service with respect to income, analogous to potatoes, farinaceous foods, and other inferior goods, consumption of which decreases with increments in income." Hilton, George W. *Rail Transit and the Pattern of Modern Cities: The California Case*. Traffic Quarterly, vol. XXI, no. 3, July 1967, p. 388.

Changes in real fares also impact ridership. The American Public Transportation Association calculates that, "On the average, a ten percent increase in bus fares would result in a four percent decrease in ridership."<sup>23</sup>

Commuting costs also include the value we place on our time, which we tend to value at approximately what we earn. This is an important, albeit mostly intuitive, decision that commuters make. For example, some downtown commuters park their cars on Berrantia Street at around \$70 a month and others park them near the center of downtown for \$150. The more affluent value their time more and tend to choose the more expensive parking. The less affluent choose the longer walk and the cheaper parking.

Parking costs are often the deciding factor in the commute decision. Our state government significantly subsidizes parking costs for state employees thus encouraging them to commute by car.

Our city government requires developers to provide minimum amounts of parking in their buildings. This has encouraged the construction of far more parking than can be economically justified and thus parking costs are far lower than they would be if left to market forces. This again has encouraged people to drive.

Service availability is usually a function of residential density. The higher density, the closer are bus stops and the greater the frequency of buses. People moving from Kaimuki to Makakilo will tend to use bus service less since bus stops will often be further away and buses less frequent.

Most of these factors are working against future public transportation increases. Incomes are rising, fares are increasing, parking costs are steady, density of residential areas is generally declining as more people leave the inner city and move to suburban areas such as those in the Leeward areas.<sup>24</sup>

A smaller percentage of workers are using public transportation to get to work both locally and nationally. Latest estimates of the 2000 Census journey-to-work data (due later this year) are that it will show Hawaii having a significant reduction in the percentage of workers using public transportation to commute than did in 1990.<sup>25</sup> This is a trend that has been ongoing nationally and locally since 1980.

In summary, bus ridership is not going to increase by merely "visioning"—a euphemism, for "wishful thinking." Voters should demand of their elected officials solid justification in forecasting increases in bus ridership—more than just improving their re-election chances.

#### Fourth: The City cost estimates

The BRT plan's capital costs will be \$750 million more than the No-Build alternative half of which will be federally funded. It is incorrect to dismiss the federal funding as "free" money. The fact is that there are many sensible alternatives that would generate equal or greater funding than BRT.

For example, a busway qualifies for 80% federal funding and its operating costs would be minimal. A busway would allow City buses to operate more frequent schedules because they

<sup>23</sup> APTA's online report on fare elasticities.

<sup>24</sup> See Table 1.14 of the 2000 State Data Book showing 1990-2000 population changes by district and census tracts. Honolulu District lost 5,000 residents while Ewa District gained 42,000.

<sup>25</sup> See Demographia Cox for 2000 data.

would not be operating on clogged highways. Vanpools, jitney buses, shared-ride taxis and other high-occupancy vehicles would be far more popular for the same reason.

And it must be remembered that a rail transit line or a bus system expansion carries with it a massive increase in operating costs. Highways, on the other hand, have relatively minor maintenance per passenger carried.

It is difficult to believe the cost forecasts for BRT because they tell us that there will be a 49 percent increase in jobs in public transit<sup>26</sup> yet there will only be a 24% increase in operating and maintenance costs.<sup>27</sup> However, since employee costs are typically 70% of operating costs,<sup>28</sup> how can this possibly be?

The City's calculation of the cost for each new ride demonstrates the poor value of the BRT plan. The calculation is \$7.42 for each additional ride for the BRT over and above that of the No-Build alternative. This amounts to \$3,710 annually per new rider.<sup>29</sup>

#### Fifth: Few real alternatives are being considered:

"Perhaps what is most surprising, and to some extent alarming, about the alternatives presented is that few real choices are offered." Dr. Cervero p. 3.7

"The TSM option appears 'born to lose,' as most TSM options are in alternatives analyses." Dr. Rutherford p. 7.2

Evaluation of the Honolulu Rapid Transit Development Project's A/D/EIS. Hawaii Office of State Planning. February, 1990.

The City has not proposed, or even examined, alternatives that have been proven to work elsewhere. Nor did they for the 1992 rail transit plan.<sup>30</sup> They merely keep proposing the conventional solutions to solve our traffic problems that have not worked anywhere else. This should be recognized and the public told the real and uncomfortable truths.

The fact is that the problems we face in transportation are as myriad as are the solutions needed. Let's take some examples of problems and possible solutions:

- Congestion caused by people commuting at normal daytime hours to major job centers such as downtown and Waikiki
- These trips are one-time peak hour trips and TheBus is not the answer. What commuters need to get them out of their cars is door-to-door transportation. The most efficient way to do this with vanpools. The problem is that the vanpool is priced at \$70 a month vs. the Express Bus at \$25. This makes the bus the hands down winner for people on a tight budget. However, the price for TheBus does not reflect its cost whereas the vanpool does.<sup>31</sup> If the Express Bus were to charge commuters its cost of \$175 per rider per month, few would ride it. Obviously, if anything, we should be subsidizing vanpools instead of Express Buses.

<sup>26</sup> SDEIS S-9. Transit jobs forecast to increase from 1,181 to 1,760, or 49%.

<sup>27</sup> SDEIS 6-5. The forecast is operating costs for the BRT plan to be \$188 million in 2010 vs. \$152 million today for No-Build, all expressed in 2010 dollars.

<sup>28</sup> 1996 National Transit Database System Wide Information for Honolulu DTS.

<sup>29</sup> The City shows the additional cost for each new ride as \$7.42. Allowing commuters \$00 rides annually (250 trips x 2 daily) is \$3,710 cost per new rider annually. Source: SDEIS Table 7.3-1B on page 7-12. See Appendix III.

<sup>31</sup> The vanpool covers 90% of its operating cost whereas the Express Bus only covers 15%.

Another fine example is that offered by Honolulu's tour bus operators whose vehicles are not that busy during commute hours. They have offered guaranteed seat Express bus service that would require a subsidy far less than what it is currently costing the City. Either of these services can provide commuter service for hotel workers and others who tend to commute at set times. A study participated in by state workers in 1991 showed that 91% of participants were very interested in door-to-door guaranteed-seat service.<sup>32</sup>

- Congestion caused by people moving around the Urban Center throughout the day. The Bus is not the best way to attract people from their cars for journeys from say, Downtown to Waikiki; it is too slow. Honolulu's jitney buses of the 1930's with their smart uniformed drivers were then much faster and more popular than the streetcars judging from the evidence given during HRT's suit against them in 1940. At that time the public pleaded with the court for the jitney buses to stay. As a current example, the air-conditioned handsome jitney buses in Atlantic City provide service at 40-second intervals—and they run 24 hours a day. Another option is the use of shared-ride taxis. These taxis are able to take many commuters at prices lower than exclusive ride taxis and since they accommodate more riders, relieve traffic congestion. They are widely used in Washington, DC and elsewhere but illegal in Honolulu.

- A growing annual bus subsidy that is now over \$100 million annually.<sup>33</sup> Our bus system is the most efficient government bus system in the U.S. We also have a wonderful post office. You can be proud of them as long as you do not compare either of them with their profitable counterparts such as Atlantic City Jitney bus service and Federal Express. There are ways to reduce the heavy burden on taxpayers and vanpools, private bus use, shared-ride taxis and jitney buses are just some of them. Ten years ago, Britain's London Transport was losing 40 cents on every dollar they took in. Today, it is privatized and profitable with the same level of service it had before. Buenos Aires, Argentina, thirty years ago lost more money than TheBus. Today, a myriad companies run 18,000 buses, none more than 23 passenger, and they are profitable and no longer a drain on the taxpayer.

- During rush hours all highways coming into town from the Leeward area are far too congested.

COST first proposed ten years ago that we should examine the feasibility of a new busway along the same alignment as the former rail transit proposed line from Waiawa to about the old OR&L rail station downtown. It would be two lanes with a safety lane, one-way into town in the morning and one-way out in the afternoon with three or four places for ingress and egress to the main freeways. It could be either state-funded for HOV van pools, high-occupancy autos and buses or it could be privately funded as a tollway. Motorists pay to be on it but it would take a great deal of traffic off existing freeways. Nothing has been done about this proposal. A busway would expand leeward mobility far more than BRT, cost less and qualify for a greater percentage of federal funds.

<sup>32</sup> Flannelly, K.J., Flannelly, L., McLeod, M.S., Jr., Behnke, R.W. *Direct Comparison of Commuters' Interests in Using Different Modes of Transportation*. Transportation Research Record #1321. Transportation Research Board. 1991.

<sup>33</sup> Including capital costs.

### FTA misrepresentation:

The Federal Transit Administration's (FTA) name is shown above the City's on the SDEIS giving the impression that they have examined and/or written the plan with the same kind of input as the City planners and approved it. Unless the FTA has indeed carefully examined the plan and signed off on its forecasts then it should either remove its name from the Final EIS or make it clear to the public that it does not stand behind these forecasts but is merely accepting "local decisions."

### Summary

The problem is that the City never spends time analyzing our traffic and transportation problems. Instead they get "visions" of the wishful thinking, ribbon-cutting variety. Then the solution drives everything else. To paraphrase the old saying, they put the train before the passenger.

And, as with all governments, they tend to simplistic views of complicated problems that will allow them a one-size-fits-all solution. Give them responsibility for clothing and you get the Mao jacket and the old Soviet baggy suit. Give them transportation and it's the one-size bus.

What is needed is a review of what has worked elsewhere in improving mobility, ameliorating traffic congestion and reducing costs.

- New York City shows us that having the City take a hands-off approach to parking and letting the market drive it significantly reduces automobiles on the road.
- Honolulu's own experience with vanpools shows us that using vouchers in conjunction with vanpools would allow us to simultaneously increase ridership and lower costs.
- Buenos Aires and London's experiences with privatization show how we could provide better service at lower cost.
- Door-to-door buses and vans using busways such as Washington DC's Shirley Highway, and others elsewhere, show us that busways can carry far more riders than rail transit lines.
- Atlantic City's Jitney buses today and Honolulu's experiences during the 1930's show us how to run a profitable urban service.
- Washington DC's shared-ride taxis show us how to increase highway capacity during rush hour.

In short, we need a businesslike approach to our traffic and transportation problems rather than a bureaucratic one.

### Notes to Appendices III

The written comments on the 1990 Draft Environmental Impact Statement were submitted by those listed below and a summary was prepared by University of Hawaii staff. The final document was published as *An Evaluation of the Honolulu Rapid Transit Development Project's Alternative Analysis and Draft Environmental Impact Statement*. Hawaii Office of State Planning and University of Hawaii, May 1990.

Dr. Penelope Canan, Professor of Sociology at the University of Denver and faculty director of the University's International Institute for Environment & Enterprise. She has served as the chair of the Environment and Technology Section of the American Sociological Association.

Dr. Moshe Ben-Akiva, Turner Professor of Civil Engineering at MIT. He works closely with Nobel Prize winner, Professor Daniel L. McFadden on forecasting issues.

Robert Cervero, Professor of Urban and Regional Planning at the University of California, Berkeley, and a member of the Editorial Board, *Journal of the American Planning Association*.

G. Scott Rutherford, is Professor of Civil and Environmental Engineering at the University of Washington and Director of its Transportation Engineering Graduate Studies Program.

Donald Shoup, Professor and Chair of Urban Planning at University of California, Los Angeles) and is also Director, of UCLA's Institute of Transportation Studies.

John R. Pucher, Professor of Urban Planning at the Blaustein School of Planning and Public Policy at Rutgers University.

What follows are quotations from the *Evaluation*. For ease of checking these quotations, the number shown after the author's name at the end of each quotation refers to the page number and the quotation's position on it. Thus, 10.5 refers to a quotation that is on page 10, 50% down the page.

### Appendix I—On traffic congestion

"A rapid transit system will not be likely to improve [traffic congestion], and such improvements should not be a major selling point for the system." Rutherford 1.5

"... it is debatable whether any noticeable impact will occur on highway facilities ..." Rutherford 6.5

"... estimates of fuel, pollution, and time savings on highway facilities are generally paper exercises that seldom occur in the real world." Rutherford 3.5

"The Final Environmental Impact Statement should more clearly state that the primary benefit of rapid transit will be to substantially increase mobility for transit-dependent commuters." UH 3.7

"...the primary benefit of rapid transit is not the reduction of automobile congestion. Rapid transit's primary benefit should be to substantially increase mobility for transit-

dependent commuters." UH 24.3

"...it appears that relatively few public benefits of any regional significance will result from any of the fixed guideway alternatives." Cervero 14.3

"...it would be highly misleading to measure the success or failure of the proposed transit system solely on the basis of its ability to reduce auto congestion. To the extent that it increases the travel speed of current bus riders, who are slowed down by roadway congestion, this would be a benefit even if congestion levels on roadways did not fall at all. At least bus riders, who are not at all responsible for creating the congestion problem on the roads, would be less likely to suffer from it." Pucher 12.5

"The only really effective way to reduce auto congestion is by raising the price of auto use ... and by giving traffic priority to buses and high occupancy vehicles." Pucher 12.4

"In order to increase transit's mode splits to the 20-30% range, a level that would begin to yield quite noticeable and important social and environmental benefits, some combination of the following initiatives would likely need to be introduced: increased fuel taxes and registration fees; elimination of free or heavily subsidized parking; introduction of an auto-restricted zone in the core area (such as practiced in Singapore); creation of HOV-lanes and contra-flow lanes that give buses operating on surface streets substantial speed advantages..." Cervero 11.6

### Appendix II—On forecasting

"I question the factoring of the transit trip table on the basis of population and employment growth, mainly because over the last decade Honolulu has shown rapid growth in everything but transit ridership... This same pattern has been observed in many other U.S. cities." Rutherford 2.5

"...the rates of growth for transit have not been in lock step with population and employment growth." UH 31.9

"The City's...model assumes that growth in transit ridership can be related as a linear function to growth in population and employment. This is a simple assumption that the City made for convenience. Although we have reasons to doubt the validity of this assumption, we have no better substitute." UH 36.7

"The City's consultants used a 'pivot-point' methodology to project ridership for the different alternatives in the year 2005. This method, which was endorsed by UMTA, has only been used elsewhere for rail extension projects, rather than for a complete system." UH 2.2

"The major weakness that reoccurs at several phases of the ridership forecasting methodology is the absence of validation against local data." Ben-Akiva 9.5.

"...no evidence is presented in the report on the validity of the...tables." Ben-Akiva 2.8

"...the level of accuracy of these boarding counts is not specified." Ben-Akiva 2.8

"The report does not present data to support these assumptions." Ben-Akiva 3.4

"My conclusion is that the selected values for the parameters of the mode choice model have not been sufficiently justified." Ben-Akiva 7.7

"I question the validity of the forecasting procedure...." Ben-Akiva 7.9

"I am not convinced that any of the models is "transferable" to other situations and I would recommend not to use them without further testing." Ben-Akiva 8.7

"Any forecasting exercise of this nature would be associated with significant uncertainties." Ben-Akiva 9.8

"...it is possible that parallel bus routes that now provide better service to some will experience a reduction in service level...it should be pointed out that several new guideway projects in the U.S. attempted to force an unnatural number of trips to the guideway, even for short segments of longer bus trips. Some systems actually had lower total transit ridership after a fixed guideway system was built." Rutherford 6.6

"Since the entire justification for the project rests on significant rates of electing public transportation over the private automobile, the failure to discover what would influence this choice may be a serious flaw." Cattan 1.8

### Appendix III—Inadequacy of the alternatives considered

#### 1. General.

"Perhaps what is most surprising, and to some extent alarming, about the alternatives presented is that few real choices are offered." Cervero 3.7

"...we think that the TSM alternative has not been adequately defined in the AA/DEIS." UH 17.4

"The range of alternatives considered in the AA/DEIS was disappointingly narrow and might have included other options." Rutherford 1.6

"I believe that it is vitally important to pay as close attention to the proper design of the TSM alternative as it is to the design of the rail alternatives before an informed decision can be made about whether and how to finance new rail transit." Shoup 12.9

"The proper specification of this [TSM] alternative is crucial, because it affects all the subsequent calculations of how many more riders the rail system will attract, and how much extra revenue will have to be raised to finance the rail system...it does not involve any other of the now common transportation demand management techniques that are an integral component of transportation system management. I would argue that the TSM alternative is inadequately specified, and thus that the contribution that TSM can make toward improving transportation is underestimated. If this is true, the improvements attributable to the rail alternatives are overestimated." Shoup 12.3

#### 2. Busways.

*COST COMMENT: Busways as used by the consultants here refers to grade-separated or barrier-separated lanes reserved for buses and high occupancy vans and cars. They are also sometimes referred to as transitways.*

"In particular, what is lacking is a serious investigation of several viable dedicated busway options." Cervero 3.4

"Where the current set of alternatives really fall short is in ignoring various busway configurations as a fundamental option to rail transit." Cervero 5.4

"Quite aside from the neglect of low cost TSM alternatives, there is no exploration of the possibility of investing more in HOV lanes for buses and carpools, as an intermediate level of investment between the No-Build alternative and the rail alternatives." Shoup 12.8

"The additional riders that might be drawn to busways (by virtue of the superior quality of service offered by buses feeding directly into neighborhoods) might more than make up any higher costs (if indeed cost estimates are accurate). If presented in terms of a more traditional benefit-cost framework, it is likely that busways would compare far more favorably with fixed guideway rail options." Cervero 4.9

"The real advantage of busways...is that they reduce...transferring, the Achilles heel of mass transit in many modern, low-density metropolises like Honolulu." Cervero 4.3

"...a TSM II could be considered that...might include contraflow lanes, busways, reversible bus streets..." Rutherford 7.2

"In summary, I would recommend that an additional study be commissioned that seriously examined a range of busway options as legitimate contenders to the fixed guideway rail options." Cervero 5.3

#### 3. Buses and Vanpools.

"...I do not believe a sufficient number of significant high-quality mass transit alternatives have been considered for Oahu." Cervero 3.3

*COST COMMENT: Mass transit is used here with its normal meaning of vehicles moving people en masse such as in trains, buses, vans or taxis. By brilliant PR, the city has managed to co-opt it to solely mean rail transit.*

"It is particularly important that intensified and significantly upgraded bus transit options be considered for Oahu in light of the fact that the bus system already in place has proven itself to be one of the most heavily utilized and cost-productive operations in the country." Cervero 5.3

"Other TSM strategies, such as those involving regional vanpool services, timed-transfer bus facilities, and auto-restraint measures, are ignored." Cervero 3.9

#### D. Political Considerations.

"This criticism [of the City's TSM alternative], I believe, is less a reflection on the work of the consultants and more an outcome of pressures exerted by various political and special interest groups." Cervero 3.4

*COST COMMENT: This may be acknowledging that Parsons, Brinckerhoff, the City's consultant for the Alternatives Analysis is also one of the nation's primary authorities on busways. They are the authors of High Occupancy Vehicle Facilities. December 1990.*

"The TSM option appears "born to lose," as most TSM options are in alternatives analyses." Rutherford 7.2

"As presented, the alternatives give the impression that a fixed guideway rail system, be it light or heavy rail, was pre-established at the outset to be the preferred high-capacity transit technology for Oahu." Cervero 3.8



Appendix IV

State Data Book, Table 18.24-- PUBLIC TRANSIT, FOR OAHU: 1991 TO 2000

(As of June 30. Tables in previous Data Book editions were based on calendar year. Service provided by City and County of Honolulu bus system)

Year	Number of buses	Bus mileage 1/	Total passengers 2/	Revenues (dollars)
1991	510	18,063,079	72,815,706	18,757,312
1992	475	18,185,305	72,980,668	19,534,823
1993	470	18,120,044	75,557,318	19,837,616
1994	501	18,398,694	77,338,147	23,897,154
1995	508	19,031,466	72,745,086	25,058,736
1996	523	19,090,912	68,823,459	30,420,878
1997	524	19,452,528	68,634,884	28,804,091
1998	525	19,665,805	71,822,553	28,197,402
1999	525	19,639,602	66,238,147	27,818,265
2000	525	20,359,607	66,602,820	27,055,656

1/ Estimated number of vehicle miles.

2/ Estimated number of passengers, including senior citizens and disabled.

Source: City and County of Honolulu, Honolulu Public Transit Authority, records; Department of Transportation Services, records.

Appendix V

The riding habit



DEPARTMENT OF TRANSPORTATION SERVICES  
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November 13, 2002

TPD02-00627

Mr. Cliff Slater  
3105 Pacific Heights Road  
Honolulu, Hawaii 96813

Dear Mr. Slater:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, 2002 SDEIS Public Hearing and April 20, 2002 letter regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. *I'm a 40-plus year resident. I have a bus pass. And I'm here to testify against the telebus.*

**Response:** Comment noted. No response required.

2. *You've - one of the things that you have not heard is that the cost of the system for each additional rider on the BRT, as opposed to the TSM Alternative, each rider will be subsidized \$3,500 annually.*

**Response:** The system is not being built only for new riders. It will substantially benefit existing riders as well. Comparing total system capital and operating costs to only new riders is not meaningful except as a relative measure. From a relative standpoint the Refined LPA is more cost-effective than either the TSM or No-Build Alternatives, in terms of the cost per new rider served.

3. *That seems to me to be somewhat excessive. And I just don't believe that we're putting our money in the right place.*

**Response:** Comment noted. It is a statement of opinion.

4. *The approach should be more, what is the 92 - you know, how are we going to solve traffic congestion for the 92 percent of the people who drive, in addition to taking care of the eight percent of the people who take the bus?*

**Response:** The Refined LPA is the transit component of the island-wide transportation plan. The vast majority of the funding in the OMO TOP 2025 Plan is for highway projects not transit. The Refined LPA will help reduce congestion by diverting some motorists out of their autos.

5. *Now, with only three minutes to address the City's voluminous paperwork, which I've gone through, I'm just going to stick to one issue, and that is, the City's absurd forecast for the No-Build Alternative. And what I'm about to say is all detailed and footnoted in the written testimony. If anybody wants it, they can contact me. The No-Build Alternative is essentially the one that says,*

Mr. Cliff Slater  
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*If we only do what we've got now with some minor improvements, then what kind of ridership do we get? And I chose that no-build - those no-build forecasts rather than the BRT forecast, because we can compare past forecasts with what actually happened to the ridership.*

**Response:** Comment noted.

6. *Secondly, this ridership, the no-build ridership, is the cornerstone on which the BRT forecast is based. And if this is not achieved, then there will be even more cars on the roads, and traffic congestion would be even worse than the City presently predicts.*

**Response:** Comment noted.

7. *So if we look at Honolulu's forecasting record, first the Hart plan in 1980 overestimated what the 1995 ridership would be under the no-build scenario by 37 percent.*

**Response:** This is not a relevant comment. Totally different forecasting models were used in 1992.

8. *Then the Hall 2000 study of 1984 overestimated the 1995 ridership by 30 percent.*

**Response:** This is not a relevant comment. Totally different forecasting models were used in 1984.

9. *The City's 1992 forecast, which they did for the rail transit program, that overestimated the bus ridership for 2000 by 32 percent. You have to hand the City at least they're consistent.*

**Response:** This is not a relevant comment. Totally different forecasting models were used in 1992.

10. *And just to sum up, okay, the City now tells us that, for the no-build, we're going to have a 54 percent increase from what we have today, and there is - we have about eight pounds of paperwork from the City, and there is not one place where that is addressed. And as somebody said a little earlier, the devil is in the details. If you don't get the ridership, you just got a lot of fancy hardware and no results.*

**Response:** The projected increases in population, employment, service levels, ridership, etc between today and 2025 with the No-Build Alternative and the bases for these forecasts are documented in the FEIS.

11. *The Supplemental Draft Environmental Impact Statement (SDEIS) is deficient in failing to plan on reducing traffic congestion, failing to justify its unprecedented predictions for Bus / Rapid Transit ridership, and failing to address the many proven alternatives which have elsewhere been shown to be more effective than what the City proposes.*

**Response:** The purpose of the BRT project is not to on its own reduce traffic congestion. It is one component of a larger transportation system. The DEIS, SDEIS, and FEIS Chapter 1 state the purposes of the Primary Corridor Transportation Project as:

1. Increase the people-carrying capacity of the transportation system in the primary transportation corridor by providing attractive alternatives to the private automobile.
2. Support desired development patterns.

3. Improve the transportation linkage between Kapolei, which is envisioned to be the "Secondary Urban Center" of Oahu, and Honolulu's Urban Core.
4. Improve the transportation linkages between communities in the Primary Urban Center (PUC) to increase the attractiveness of in-town living.

As indicated in Chapter 4 of the FEIS, congestion will be less with the Refined LPA compared to the other alternatives. Ridership forecasts were prepared using state-of-the-art forecasting models. There are no proven alternatives elsewhere that are more cost-effective than the Refined LPA.

12. First, Honolulu commuters are expecting that the Primary Corridor Transportation Project will give them some measure of relief from traffic congestion. 1 Supplemental Draft Environmental Impact Statement: Primary Corridor Transportation Project. U.S. Department of Transportation and the City and County of Honolulu, March 2002 (SDEIS)

**Response:** See response to comment #10. It is unrealistic for commuters to expect that one project on its own will alleviate traffic congestion.

13. Instead, the City's BRT plan predicts that traffic congestion, under the City's most optimistic BRT scenario, will be worse than it is today.

**Response:** Not a correct statement. As shown in Chapter 4 of the FEIS, traffic LOS will be worse with the No-Build and TSM Alternatives compared to the Refined LPA.

14. The City plans to improve bus service by removing existing automobile lanes and change them to exclusive bus lanes. In short, they will improve bus service for the 8% of commuters that use it, but only by making traffic congestion worse for the 92% of our citizens that drive.

**Response:** Chapter 4 of the FEIS fully discusses the consequences of converting selected general purpose lanes to priority use by transit vehicles.

When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

15. Second, traffic congestion will be even worse than what the City projects because they will not meet their optimistic BRT ridership projections. Fewer riders will mean more cars.

**Response:** Comment noted.

16. Third, the serious decline in Honolulu's bus ridership over the past ten years is totally ignored in discussing projected ridership increases. Nor does the City address reasons for the long-term decline in the percentage of commuters using public transportation all over the U.S. These must be explained to make any sense of the City's projections.

**Response:** The decline in ridership of the bus system in Honolulu over the past decade is tied to the weak economy and minimal population growth that has occurred during this period.

The decline in the percent of people using transit in the U.S. has resulted from growth patterns in most cities that are difficult to serve effectively by transit. In contrast the concentration of growth proposed for the primary corridor combined with an improved transit system is why Honolulu is projected to counter this trend.

17. Fourth, even if the City were to make its BRT budget estimates, the cost per each additional bus rider will be an outrageous \$3,700 annually. Cost overruns will increase this. There are far more effective and cost-efficient projects to be adopted that will also qualify for federal funds.

**Response:** The system is not being built only for new riders. It will substantially benefit existing riders as well. Comparing total system capital and operating costs to only new riders is not meaningful except as a relative measure. From a relative standpoint the Refined LPA is more cost-effective than either the TSM or No-Build Alternatives, in terms of the cost per new rider served.

18. Fifth, like its former rail transit plan, the city has examined none of the alternatives that have proven to work elsewhere. We shall discuss these in detail.

**Response:** Comment noted.

19. Sixth, the Federal Transit Administration's (FTA) name is on the SDEIS giving the impression that they have examined and approved the plan.

**Response:** The FTA is the federal lead agency for the project under NEPA. One of their responsibilities is to review and approve the MISDEIS, SDEIS, and FEIS.

20. Ten years ago the state of Hawaii employed outside transportation experts from the nation's leading universities to critique the rail transit proposal of the time. 2. No such outside critique was sought for the BRT plan. However, the experts' comments on the rail transit plan are for the most part valid for today's BRT plan. We shall quote from them extensively where appropriate. 2. An Evaluation of the Honolulu Rapid Transit Development Project's Alternative Analysis and Draft Environmental Impact Statement. Hawaii Office of State Planning and University of Hawaii. May 1990.

**Response:** Comment noted. We do not agree that the Honolulu Rapid Transit Project that was proposed ten years ago is comparable to the proposed Primary Corridor Transportation Project.

21. "...the primary benefit of rapid transit is not the reduction of automobile congestion. Rapid transit's primary benefit should be to substantially increase mobility for transit-dependent commuters."

**Executive Summary, Evaluation of the Honolulu Rapid Transit Development Project's AA/DEIS, Hawaii Office of State Planning, February, 1991.**

You would think that when the City discusses improving Urban Mobility, they mean reducing traffic congestion. They do not. What the city means is improving service for bus riders - at the expense of drivers.

**Response:** This quote and the report cited pertain to the 1990 Honolulu Rapid Transit Development Project and is dated information that pertains to a different project. The cited report paragraph actually states: "The final environmental impact statement should more clearly state that the primary benefit of rapid transit will be to substantially increase mobility for transit."

dependent commuters. Rapid transit may relieve some traffic congestion, but that objective is more difficult to achieve, because of the large latent demand for auto travel in highly congested areas. Some of the other public benefits of rapid transit such as the increase in general mobility, the decrease in required downtown parking capacity, the opportunity to improve urban design and character, and the facilitation of both pedestrian travel and short, intra-city trips should also be discussed in the final environmental impact statement.

Urban mobility does not necessarily mean reducing traffic congestion. It entails providing residents with several options to utilize in making a trip, be that the automobile, transit, taxis, walking, or bicycling.

22. Here's what the plan says:

"While greatly improving transit service and person carrying capacity, the ... BRT ... would result in a somewhat reduced Level of Service for automobile traffic within the urban core." (SDEIS, S-8.7)

Response: The text actually states: "While greatly improving transit service and person carrying capacity, the TSM and Refined BRT Alternatives would result in a somewhat reduced LOS for automobile traffic within the Urban Core." (SDEIS, eighth bullet)

23. The ... BRT ... would provide more person carrying ability ... by reallocating roadway lanes from general ... use to transit or ride-share use" (SDEIS 4-11.5)

Response: The text actually states: "Improvements within the In-Town urban core with the TSM and Refined BRT Alternatives focus on converting general-purpose traffic lanes to semi-exclusive and exclusive transit lanes. Doing so improves person-carrying capacity, thereby providing an alternative to the automobile for mobility within the Urban Core." (SDEIS page 4-11, fourth paragraph)

Table 4.2-1 shows that the Refined BRT alternative would improve the person carrying ability within the Urban Core by an average of 11 percent over the No-Build Alternative. This means that to get an equivalent increase in general-purpose throughput, total Urban Core roadway lanes would have to be increased by almost two lanes in each direction, which will require major displacements." (SDEIS page 4-1, Section 4.2.1, third paragraph)

24. "Due to their use of exclusive transit lanes, BRT vehicles could pass freely through congested intersections even though intersection LOS for the general-purpose lanes might be poor. The result would be less delay for transit riders and better transit schedule reliability." (SDEIS 4-20.5)

Response: No response required. It is a direct quote from the SDEIS. It should be noted that the paragraph begins by stating: "Improving person carrying capacity in a congested urban area relies on the ability of the transit system to operate efficiently. Table 4.2-7 shows that the Refined BRT Alternative would be unique in providing a travel mode that could avoid the auto congestion at key intersections that is forecasted for all alternatives."

25. It is easy to figure out why traffic will get worse; many streets will have existing lanes turned into auto-free exclusive BRT lanes. Below are rush hour photos of affected City streets. Note that on Kapiolani Boulevard four lanes are going one-way into town. These will be reduced to just two lanes. Dillingham Boulevard presently has three lanes coming into town one-way in the morning; it will be reduced to ONE! See the SDEIS pp. 2-21 & 2-22 for a list of all the many streets that will lose lanes.

Response: The comment is incorrect. There are two (not three) through travel lanes in each direction on Dillingham Boulevard today. Besides, it is not the conversion of lanes that will create the congestion. The congestion for motorists will be there without the BRT. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

26. The City did not see fit to carry over existing congestion levels for 1995 for comparison purposes from the DEIS. However, table 1.2-9 in page 1-18 of the DEIS may be compared to table 4.2-3 on page 4-14 of the SDEIS to see that overall traffic congestion in the future with BRT is projected to be worse than today.

Response: As shown in Chapter 4 of the FEIS congestion will be less with the Refined LPA not worse compared to the No-Build and TSM Alternatives.

27. Improving public transportation is unlikely to have any beneficial effects on traffic congestion.

Response: As shown in Chapter 4 of the FEIS congestion will be less with the Refined LPA not worse compared to the No-Build and TSM Alternatives.

28. See Appendix I for comments on the 1992 rail plan's likely impact on traffic congestion by some of the nation's leading transportation experts. And bear in mind as you read them that grade-separated rail was obviously a better candidate for traffic congestion relief than BRT.

Response: See response to questions 72, below. It should be noted that the information quoted was prepared over ten years ago for the Honolulu Rapid Transit Development Project. It is outdated information and the former rail project and the proposed BRT project do not have identical alignments, stop locations, etc.

29. You can easily imagine what all this reduction in rush-hour road space will do to traffic. Review the photos on the page following.

Response: See response to comment # 14.

30. The HART plan forecast in 1980 that if the City did nothing beyond already planned road improvements and merely expanded the bus system, ridership would increase to 100 million annually by 1995. (Transit Coalition for Honolulu. The Hart Book, 1981) In fact, by 1995 ridership was only 73 million - a 37% overestimation.

Response: The accuracy of travel demand forecasting models has improved significantly since 1980.

31. Subsequently, the Hall 2000 study, predicted in 1984 that if the City did nothing special beyond what they had already committed to, bus ridership would increase to 85 million riders by 2000. (The daily data of 274,000 was changed to annual to allow comparisons.) However, actual bus ridership of 66.6 million for 2000 was less than it had been at the time of the prediction. Thus, this was a 22% overestimation.

Response: The accuracy of travel demand forecasting models has improved significantly since 1984.

32. Subsequently, in 1992 the City forecast for their rail transit plan, a 21% increase in ridership from 1991 to 2005 (Final Environment Impact Statement, 4-10-7) if they did nothing special. (This is the so-called No-Build Alternative, defined as those eight roadway projects already committed for the next two years, and expansion of bus service for areas planned for development.) So far, we have seen an 8.5 - 13% DECREASE. (State Data Book 2000, Table 18.24. See also Appendix III.) Even if ridership does not decline further by 2005, it will be a 32% overestimation.

**Response:** The relatively static population growth combined with the weak economy during the past decade, which were not anticipated when the 1992 forecasts were prepared, have resulted in the overestimation.

33. Now the City is forecasting that, once again, if we do nothing special, there will be 266,700 daily bus trips in 2025 (SDEIS, Table 7.1-2) against 1991 trips of 206,650, a 39% increase. However, since 1991 we have had this decline in ridership and so, to make their forecast, they will need to increase simple regular bus ridership 54%.

**Response:** The forecast of 2025 ridership is consistent with the population growth forecast and return to a healthier economy than has prevailed during the past decade.

34. Now remember that this decline in ridership for 1991 - 2000 has occurred despite a 5% increase in Oahu's population and more buses in use - from 475 (1993-4 State Data Book) to 525. (2000 State Data Book) And ridership is still declining as of the latest publicly available data of September 2001. (American Public Transportation Association statistics to September 2001)

**Response:** See responses to comments #32 and #33.

35. Given the above it is impossible to believe that the City will actually make anything like a 54% increase.

**Response:** Comment noted.

36. On top of the "No Build" forecast the City wants us to believe that the BRT will boost this to 336,700 daily transit trips (SDEIS 7-6. These are linked trips, which is to say, from departure point to destination regardless of transfers. This is different from what the City normally reports which is boardings. If you transfer once on your way to your destination it will count as two boardings. Typically for the system overall, there are 16% more boardings than trips.) vs. 206,650 trips in 1991 (about 166,000 today). (SDEIS 4.5.4)

**Response:** The relationship between linked-trips and boardings is not a static percentage. It varies with possible changes in service provided and with changes in trip patterns.

37. No city in the U.S. has experienced such an increase in public transportation no matter what they have done - rail transit, busways or anything else - once they were past the initial government takeovers and subsequent massive deficits of the 1970s.

**Response:** No one is comparing ridership to what it was in the pre-1970s.

38. One can begin to understand why many University of Hawaii specialists in economics and forecasting wrote the City Council in 1992 about its then rail transit plan, saying "We have little faith in the projected ridership and cost figures." (University of Hawaii faculty members. Memorandum to Members of the Council, City & County of Honolulu, November 7, 1991.)

**Response:** Specialists in travel demand forecasting from the University of Hawaii have been involved in developing the forecasting models that were used in the current ridership forecasts.

39. One can also understand the outpouring of criticism from the state's own distinguished experts on the flaws in the ridership projections (see Appendix I). One of them was Dr. Moshe Ben-Akiva, Turner Professor of Civil Engineering at MIT, and a forecasting colleague of Nobel Prize Winner, Professor Daniel L. McFadden. Ben-Akiva said of the 1992 exercise, "I question the validity of the forecasting procedure..." and "I am not convinced that any of the models is transferable to other situations and I would recommend not to use them without further testing." And "Any forecasting exercise of this nature would be associated with significant uncertainties."

**Response:** OMPO has spent the last 5 years developing a vastly improved set of forecasting models. These are the models used in the PCTP. Comments made in reference to the models used in 1992 are not applicable.

40. One of the recommendations that came out of the U.S. Dept. of Transportation's review of the highly flawed rail transit forecasting of the 1970s and 1980s was that planners should "acknowledge that uncertainty in achieving any specific level of predicted ridership levels exists," and should, "be conveyed simply by expressing forecast ridership for each alternative as a range rather than a single point value." (Pickrell, Don H. Urban Rail Transit Projects: Forecast Versus Actual Ridership and Cost. U.S. Dept. of Transportation, October 1990, p. 74.)

**Response:** This recommendation from the Pickrell Report was not adopted by the FTA who oversee how forecasting is done.

41. What should give us pause is that City forecasts for the last 30 years have been consistently in error and in the same range of 30%+ as those experienced elsewhere. Yet this latest forecast of BRT ridership, the 336,700 riders projected for 2025, is shown to the nearest hundred. This conveys to the reader a certainty to the nearest 3/100ths of one percent, a ridiculous claim.

**Response:** It is standard practice to show ridership forecasts as they are shown in the FEIS.

42. The best way to test forecasting models is to backtrack. You go back to the 1984 data from the Hill 2000 study and use it in your model to forecast for 2001. Then go back to the 1992 data from the rail transit FEIS and again forecast for 2001. If the forecasts match the actual outcome then your model might have a change of being right about the future. Certainty if a model cannot even backtrack, it should not even be considered when risking taxpayers' monies. This has not been done.

**Response:** The models used to forecast ridership were indeed calibrated using industry approved methods of validation.

43. Since the entire justification for the project rests on significant rates of electing public transportation over the private automobile, the failure to discover what would influence this choice may be a serious flaw." Dr. Canan, Evaluation of the Honolulu Rapid Transit Development Project's AWDEIS. Hawaii Office of State Planning, February, 1991.

**Response:** Again, the analysis cited was completed in April 1990 and pertained to the Honolulu Rapid Transit Development Project. It is not applicable to the PCTP.

44. World War II aside, the per capita use of public transit peaked in Hawaii (and the U.S.) in the early 1920s when the automobile began to compete with streetcars and buses. It continued declining until World War II when it then rose sharply with the introduction of gas rationing. At war's end, when rationing ended, the decline continued again until reaching its all time low in 1971. (Total annual transit rides, divided by population, or per capita transit use, is what used to be called the riding habit. In the days of privately operating public transportation it was considered the key indicator of transit viability. For example, in Honolulu proper in 1920 we had 17 million transit rides with a population of just 82,000 - a riding habit of 207 - and solidly profitable. By 1998 the area covered had expanded to the whole of Oahu and we had 71 million riders but a population of 872,000 - a riding habit of 81. See Appendix V for chart.)

Response: Comment noted.

45. At that time, the City socialized the then profitable bus system. (See Annual Report for 1971. Honolulu Rapid Transit Co. Ltd.)

Response: It is interesting to note that in 1971 HRT Ltd and wholly-owned subsidiaries had \$402,817 earnings in 1971 and in 1972 the parent company reported a \$494,449 loss, while the 1972 consolidated statement of loss indicated a \$108,149 loss. (Source: HRT, Ltd., Annual Report, 1972.)

46. Once the City took over, it poured money into new routes to the suburbs, up the hillsides, and around the island. With new buses and new routes, transit use rose again - albeit this time at a heavy cost to the taxpayer. In 1984 the per capita transit use peaked once more and then began another decline that has continued for the last 16 years.

Response: Actually, the 1995 annual bus ridership exceeded 1984 (80,837,153 total passengers compared to 76,260,187, respectively).

47. The principal causes of the decline in public transportation use are well-known and well documented. The choices we make between public transportation and automobile are primarily functions of changes in real incomes, commuting costs and service availability.

Response: Although this statement may be true, the author does not reference where this is documented and by whom it is well known. It can also be said that commuters that are provided a rapid transit system that provides a faster commute that includes limited stops along the route may choose public transportation instead of driving a car. This is evidenced by the popularity of the CityExpress routes Honolulu has implemented.

48. As real (net of inflation) incomes increase, people tend to use public transportation less. Public transportation services is one of what economists technically refer to as inferior goods - those goods and services that the more income you have, the less you want them. (UCLA's Professor George Hilton pointed this out in 1967 saying "... an increase of one percent in family income will typically reduce the family's use of rail passenger service by 0.6 percent. Thus, rail passenger trains provide an inferior service with respect to income, analogous to potatoes, farinaceous foods, and other inferior goods, consumption of which decreases with increments in income." Hilton, George W. Rail Transit and the Pattern of Modern Cities: The California Case. Traffic Quarterly, vol. XXI, no. 3, July 1967, p. 368) Thus, over the long-term, increases in incomes work against transit ridership.

Response: The referenced document is 35 years old and refers to "heavy" rail. In the paragraph following the one quoted it states: "There is little question that the Bay Area Rapid Transit will be more successful than the Southern Pacific commutation service in attracting passengers from automobiles."

49. When real automobile commuting costs decline, people tend to use automobiles more. Conversely, increases in auto costs drive people to public transportation. When service availability declines, such as less frequent bus service, people tend to switch to automobiles.

Response: Comment noted. Although the factors stated do affect automobile and transit use, other factors also affect their use including income, proximity of transit service provided, automobile ownership, etc.

50. Changes in real fares also impact ridership. The American Public Transportation Association calculates that, "On the average, a ten percent increase in bus fares would result in a four percent decrease in ridership." (APTA's online paper on fare elasticities.)

Response: Comment noted. The publication quoted also noted that peak-hour commuters are much less responsive to fare changes than transit passengers traveling during off-peak hours.

51. Commuting costs also include the value we place on our time, which we tend to value at approximately what we earn. This is an important, albeit mostly intuitive, decision that commuters make. For example, some downtown commuters park their cars on Beretania Street at around \$70 a month and others park near the center of downtown for \$150. The more affluent value their time more and tend to choose the more expensive parking. The less affluent choose the longer walk and the cheaper parking.

Response: Comment noted. Other factors regarding parking and costs include the location of the work place, work hours, employer parking subsidies, etc. It should be noted that the BRT would allow people an option to driving their cars and not having to pay for parking. There are many affluent people around the nation that choose public transportation for their commute over driving a car.

52. Parking costs are often the deciding factor in the commute decision. Our state government significantly subsidizes parking costs for state employees thus encouraging them to commute by car.

Response: Comment noted.

53. Our city government requires developers to provide minimum amounts of parking in their buildings. This has encouraged the construction of far more parking than can be economically justified and thus parking costs are far lower than they would be if left to market forces. This again has encouraged people to drive.

Response: See response to comment #50.

54. Service availability is usually a function of residential density. The higher density, the closer are bus stops and the greater the frequency of buses. People moving from Kaimuki to Māhukū will tend to use bus service less since bus stops will often be further away and buses less frequent.

Response: Comment noted.

55. Most of these factors are working against future public transportation increases. Incomes are rising, fares are increasing, parking costs are steady, density of residential areas is generally declining as more people leave the inner city and move to suburban areas such as those in the Leeward areas. (See Table 1.14 of the 2000 State Data Book showing 1990-2000 population changes by district and census tracts. Honolulu District lost 5,000 residents while Ewa District gained 42,000.)

Response: These are unsubstantiated assertions. Fares have not increased to any greater extent than parking charges. Future growth plans call for the densification of the primary corridor not decline.

56. A smaller percentage of workers are using public transportation to get to work both locally and nationally. Latest estimates of the 2000 Census journey-to-work data (due later this year) are that it will show Hawaii having a significant reduction in the percentage of workers using public transportation to commute than did in 1990. (See *Demographics Cox for 2000 data*.) This is a trend that has been ongoing nationally and locally since 1980.

Response: In reviewing the reference cited, what was not included was that Hawaii's employment also declined between 1990 and 2000, from 567,765 to 563,154 or a loss of 4,611 jobs. The transit market share for work trips also decreased between 1990 and 2000, from 41,827 to 35,368 or 6,453. To correct this trend the City is proposing major improvements to the bus system as embodied in the Refined LPA. Similar types of improvements in other cities have demonstrated the ability to reverse these trends and to divert people out of their autos and on to transit.

57. In summary, bus ridership is not going to increase by merely "visioning" - a euphemism, for "wishful thinking." Voters should demand of their elected officials solid justification in forecasting increases in bus ridership - more than just improving their re-election chances.

Response: The ridership forecasts were not prepared by elected officials. The methodology used in preparing the forecasts is documented in the FEIS and in the Final Documentation for the OMOPO Travel Forecasting Model Development Project.

58. The BRT plan's capital costs will be \$750 million more than the No-Build alternative half of which will be federally funded. It is incorrect to dismiss the federal funding as "free money." The fact is that there are many sensible alternatives that would generate equal or greater funding than BRT.

Response: For example, a busway qualifies for 80% federal funding and its operating costs would be minimal. A busway would allow City buses to operate more frequent schedules because they would not be operating on clogged highways. Vanpools, jitney buses, shared-ride taxis and other high-occupancy vehicles would be far more popular for the same reason.

Response: The comment doesn't reflect an understanding of what is being proposed since busways are the back-bone of the Refined LPA. These busways are within existing transportation rights-of-way.

59. And it must be remembered that a rail transit line or a bus system expansion carries with it a massive increase in operating costs. Highway, on the other hand, have relatively minor maintenance per passenger carried.

Response: That's because the operating and maintenance costs of the cars and trucks using the roads aren't included. If these costs are included the bus system is much more cost effective in terms of cost per passenger carried.

60. It is difficult to believe the cost forecasts for BRT because they tell us that there will be a 49 percent increase in jobs in public transit (SDEIS S-9). Transit jobs forecast to increase from 1,181 to 1,760 (or 49%), yet there will only be a 24% increase in operating and maintenance costs. (SDEIS S-5. The forecast is operating costs for the BRT plan to be \$188 million in 2010 vs. \$152 million today for No-Build, all expressed in 2010 dollars.) However, since employee costs are typically 70% of operating costs (1996 National Transit Database System Wide Information for Honolulu DTS), how can this possibly be?

Response: The 2025 jobs are being compared with 2010 operating and maintenance costs, which is not correct.

61. The City's calculation of the cost for each new ride demonstrates the poor value of the BRT plan. The calculation is \$7.42 for each additional ride for the BRT over and above that of the No-Build Alternative. This amounts to \$3,710 annually per new rider. (The City shows the additional cost for each new ride as \$7.42. Allowing commuters 500 rides annually (250 trips x 2 daily) is \$3,710 cost per new rider annually. Source: SDEIS Table 7.3-1B on page 7-12.)

Response: See response to comment #2.

62. "Perhaps what is most surprising, and to some extent alarming, about the alternatives presented is that few real choices are offered." Dr. Cervero p. 3.7

Response: The TSM option appears "born to lose," as most TSM options are in alternatives analyses." Dr. Rutherford p. 7.2

Response: Evaluation of the Honolulu Rapid Transit Development Project's AADEIS. Hawaii Office of State Planning. February, 1990.

Response: The information cited is over ten years old and pertains to a different project.

On the same page as the Dr. Cervero's quote, it also states: "This criticism, I believe, is less a reflection on the work of the consultants and more an outcome of pressures exerted by various political and special interest groups. The range of alternatives presented are built on several prior studies which established this corridor as the most potentially cost-effective one for building a fixed guideway system. At the outset, the consultants acknowledge that the same corridor which evolved from the PEEP I and PEEP II studies was adopted in this latest round of analysis. Through a careful prescreening of alternative routings for different segments as a result of a series of public hearings in 1987-88, the final set of alternatives were pruned to those included in the latest reports. Ostensibly because of concerns of displacing established residences, encroaching on parkland, interfering with surface street traffic, and intruding on several sites of historical significance, a number of other routing alternatives were eliminated."

In the paragraph above Dr. Rutherford's quote, first sentence it states: "Given the linear nature of travel demand, high densities, the constrained travel corridor, good weather, and high current ridership, Honolulu is an obvious candidate for a fixed guideway transit of some sort."

63. The City has not proposed, or even examined, alternatives that have been proven to work elsewhere. Nor did they for the 1992 rail transit plan. (See Appendix III.) They merely keep proposing the conventional solutions to solve our traffic problems that have not worked anywhere else. This should be recognized and the public told the real and uncomfortable truths.

Response: BRT has proven itself successful in cities around the world, including Curitiba, Brazil; Nagoya, Japan; Madrid, Spain; Brisbane, Australia; Wellington, New Zealand; Dublin, Ireland; Ottawa, Canada; Pittsburgh, PA; Washington, D.C.; Los Angeles, CA; New York City, NY; and Orlando, FL to name a few.

64. Congestion caused by people commuting at normal daytime hours to major job centers such as downtown and Waikiki. These trips are one-time peak hour trips and TheBus is not the answer. What commuters need to get them out of their cars is door-to-door transportation. The most efficient way to do this with vanpools. The problem is that the vanpool is priced at \$70 a month vs. the Express Bus at \$25. This makes the bus the hands down winner for people on a tight budget. However, the price for TheBus does not reflect its cost whereas the vanpool does. (The vanpool covers 90% of its operating cost whereas the Express Bus only covers 15%.) If the Express Bus were to charge commuters its cost of \$175 per rider per month, few would ride it. Obviously, if anything, we should be subsidizing vanpools instead of Express Buses.

Response: Reducing congestion requires a multi-modal approach. Buses, BRT, vanpools, HOV lanes, parking management, etc. are all measures that are needed.

65. Another fine example is that offered by Honolulu's tour bus operators whose vehicles are not that busy during commute hours. They have offered guaranteed seat Express bus service that require a subsidy far less than what it is currently costing the City. Either of these services can provide commuter service for hotel workers and others who tend to commute at set times. A study participated in by state workers in 1991 showed that 91% of participants were very interested in door-to-door guaranteed-seat service. (Flannery, K.J., Flannery, L., McLeod, M.S., Jr. Behnke, R. W. Direct Comparison of Commuters' Interests in Using Different Modes of Transportation. Transportation Research Record #1321. Transportation Research Board, 1991)

Response: The referenced study indicates that the survey conducted was not participated in by state workers but by Milliani workers using a mail survey conducted in cooperation with the neighborhood board. Six hundred and sixty-six (666) surveys were analyzed. The 91% interest in door-to-door, guaranteed-seat service was based on a \$1.00 one-way fare. The study also shows that if the one-way fare offered increases to \$2.00, "...consumer interest drops sharply with higher fares and quickly becomes negative." The negative interest relates to a \$3.00 one-way fare.

66. Congestion caused by people moving around the Urban Center throughout the day. TheBus is not the best way to attract people from their cars for journeys from say, Downtown to Waikiki; it is too slow. Honolulu's jitney buses of the 1930s with their smart uniformed drivers were then much faster and more popular than the streetcars judging from the evidence given during HRT's suit against them in 1940. At that time the public pleaded with the court for the jitney buses to stay. As a current example, the air-conditioned handsome jitney buses in Atlantic City provide service at 40-second intervals - and they run 24 hours a day.

Another option is the use of shared-ride taxis. These taxis are able to take many commuters at prices lower than exclusive ride taxis and since they accommodate more riders, relieve traffic congestion. They are widely used in Washington, DC and elsewhere but illegal in Honolulu.

Response: Independent small vehicle carriers are most likely to fall under the City and County's taxicab rules and regulations the Department of Customer Service administrators, Chapter 12, Regulations of Common Carriers and Their Fees, Rules Ordinances of Honolulu. As of 1998, there were 1,365 taxicabs licensed to do business in the City and County.

Upon initial reading, jitney services would not appear to be allowed under the City rules, except when there is a total stoppage in the public bus service (see Section 12-1.11 Special operations). This section appears to treat jitney services as an extreme exception, rather than an allowable practice under certain conditions. Taxicabs, however, are allowed to provide shared-ride service, as long as each passenger agrees to share the ride with the other passenger(s) (see Sec. 12-1.24 Shared-ride service; Sec. 12-1.4 Prohibited acts. (d) Additional Passengers). This section on shared ride service specifically allows for limousines and multi-passenger vans. Under the shared rider service rule, any taxicab could technically operate as a jitney by having signage indicating that it is a shared ride taxicab for a particular street or route.

The State Public Utilities Commission (PUC) regulates non-taxicab transportation service carriers—Hawaii Administrative Rules, Title 6, Chapter 62, Motor Carrier Rules and Classification of Property and Passenger Carriers. In general, the PUC-regulated carriers are companies with one or more fleets of vehicles ranging from large vans to shuttles to mini-buses to full-size buses.

The PUC issues two types of certificates for non-taxicab transportation service carriers: irregular route and regular route. The certificate of irregular route service is for service of a general nature, which may have fixed stops but not on a regular schedule. All of the major transportation and tour companies have certificates of irregular route service. The certificate of regular route service is for service over a fixed route with stops at fixed locations and on a time schedule, which could be daily or hourly. Examples of regular route service are E Noa Tours' Waikiki Trolley and the Ala Moana Shuttle. Companies under regular route certificates operate in such areas as Maui's Kapalua/Kaanapali/Wailea/Lahaina loop and between resort areas on the island of Hawaii. Regular route service is almost akin to a private bus service. Although, there is no public subsidy, some companies keep passenger fares low by seeking cost sharing from resort properties and attractions serviced by regular route service.

Specifically exempt from PUC rules are "county-regulated passenger carrying operations known as 'jitney services'...utilizing motor vehicles that have seating accommodations for six to 25 passengers, operate along specific routes during defined service hours, and levy a flat fare schedule" (See Hawaii Revised Statutes, Chapter 271-5(18), Exemptions, generally). The intent of this exemption seems to be one of avoiding doubly regulating jitney operations. However, as described earlier, the City and County of Honolulu does not currently regulate jitney services, except for providing an exception for service during a total bus stoppage. In fact, under the PUC's current rules structure, a regulated motor carrier could operate a service that would have many of the same features as a jitney service, i.e., fixed route, semi-regular schedule of smaller vehicles such as trolleys or shuttle vans or mini-buses.

(Source: Draft Product 2-5, Technical Paper on Privatization Options, June 1999)

67. A growing annual bus subsidy that is now over \$100 million annually (including capital costs). Our bus system is the most efficient government bus system in the U.S. We also have a wonderful post office. You can be proud of them as long as you do not compare either of them with their profitable counterparts such as Atlantic City jitney bus service and Federal Express. There are ways to reduce the heavy burden on taxpayers and vanpools, private bus use, shared-ride taxis



and jitney buses are just some of them. Ten years ago, Britain's London Transport was losing 40 cents on every dollar they took in. Today, it is privatized and profitable with the same level of service it had before. Buenos Aires, Argentina, thirty years ago lost more money than TheBus. Today, a myriad companies run 18,000 buses, none more than 23 passengers, and they are profitable and no longer drain on the taxpayer.

Response: Comment noted. No response required.

68. During rush hours all highways coming into town from the Leeward area are far too congested. COST first proposed ten years ago that we should examine the feasibility of a new busway along the same alignment as the former rail transit proposed line from Waiwae to about the old ORNL rail station downtown. It would be two lanes with a safety lane, one-way into town in the morning and one-way out in the afternoon with three or four lanes for ingress and egress to the main freeways. It could be either state-funded for HOV van pools, high-occupancy autos and buses or it could be privately funded as a tollway. Motorists pay to be on it but it would take a great deal of traffic off existing freeways. Nothing has been done about this proposal.

A busway would expand leeward mobility far more than BRT, cost less and qualify for a greater percentage of federal funds.

Response: Use of the already in place H-1 freeway as a busway/HOV facility by extending the existing A.M. zipper lane and adding a P.M. zipper lane along with ramp improvements that give priority to buses is a much more cost effective solution to serving the Leeward area than building a whole new busway (particularly since much of the right-of way for an independent busway no longer exists).

69. The Federal Transit Administration's (FTA) name is shown above the City's on the SDEIS giving the impression that they have examined and/or written the plan with the same kind of input as the City planners and approved it. Unless the FTA has indeed carefully examined the plan and signed off on its forecasts then it should either remove its name from the Final EIS or make it clear to the public that it does not stand behind these forecasts but is merely accepting "local decisions."

Response: The MIS/DEIS, SDEIS, and FEIS are Federal documents and the FTA (as the lead Federal agency) is responsible for the contents. The City is a cooperating agency.

70. The problem is that the City never spends time analyzing our traffic and transportation problems. Instead they get "visions" of the wiseful thinking, ribbon-cutting variety. Then the solution drives everything else. To paraphrase the old saying, they put the train before the passenger.

Response: It should be noted that the City, State, and OMPD are continually analyzing and implementing solutions to Honolulu's traffic and transportation problems. This is evidenced by the Transportation for Oahu Plan, TOP 2025, which includes congestion relief projects, transit and alternative modes projects, operations and safety projects, second access projects, projects that support community planning goals, and projects that provide local circulation and/or community access.

71. And, as with all governments, they tend to simplistic views of complicated problems that will allow them a one-size fits-all solution. Give them responsibility for clothing and you get the Mao jacket and the old Soviet beggy suit. Give them transportation and it's the one-size bus.

Response: The Refined LPA includes many components including conversion of the bus system to a hub-and-spoke network; maximizing use of the existing H-1 Freeway through zipper lanes and ramp improvements; and an In-Town BRT which significantly increases the people carrying capacity of the roadway system in the urban core. These are all innovative, cost-effective approaches to meeting future needs without the need for major roadway widening and new construction.

72. What is needed is a review of what has worked elsewhere in improving mobility, ameliorating traffic congestion and reducing costs.

A) New York City shows us that having the City take a hands-off approach to parking and letting the market drive it significantly reduces automobiles on the road.

B) Honolulu's own experience with vanpools shows us that using vouchers in conjunction with vanpools would allow us to simultaneously increase ridership and lower costs.

C) Buenos Aires and London's experiences with privatization show how we could provide better service at lower cost.

D) Door-to-door buses and vans using busways such as Washington DC's Shirley Highway, and others elsewhere, show us that busways can carry far more riders than rail transit lines.

E) Atlantic City's Jitney buses today and Honolulu's experiences during the 1930s show us how to run a profitable urban service.

F) Washington DC's shared-ride taxis show us how to increase highway capacity during rush hour.

Response:

A) New York City parking costs can be as much as \$600 per month. New York City Transit carries six million trips per day, about two billion trips annually. New York has a fine, well-established, public subway and bus system, which includes BRT. (<http://www.mta.nyc.ny.us/nyctfacts/fmtrp.htm>)

B) On a per ride basis, vanpool costs become comparable to the operating and maintenance costs of a bus when there are at least 5 passengers per van.

C) Bus privatization in London was not initiated to relieve traffic problems. Charlie Lloyd of the University of North London points out that while privatization has been relatively cost effective in London, that stands in sharp contrast to privatization ventures elsewhere in Britain. ([http://www.citibcc.ca/Mar96\\_London.html](http://www.citibcc.ca/Mar96_London.html)) These bus systems also still report to Transport for London, which oversees bus companies and sets fares. Transport for London reports to London's mayor.

Our research for Buenos Aires mentions public buses and subway system, not privatization.

D) We concur that busways can carry as many people as rail transit lines and thus the BRT Alternative. "Since September, 1969, high-speed buses have been traveling on the Shirley's exclusive bus lanes, providing for many commuters an alternative to the daily time-consuming, rush-hour drive in bumper-to-bumper traffic. An increasing number of these former motorists are leaving their cars at home or parked in the suburbs and taking the bus, because the bus gets them to and from work much faster." ([http://www.roadstothefuture.com/Shirley\\_Busway.html](http://www.roadstothefuture.com/Shirley_Busway.html))

E) Jitneys were popular in the first half of the 20th century in lots of American cities, like Honolulu. The reason they worked well and are only seen in a few cities today may be attributable to the

population increases and geographic expansion major urban areas have experienced. Honolulu's population has quadrupled since 1830, when it was 202,887. (<http://www.hawaii.gov/obedi/2000010197.htm>)

F) Washington D.C. has an efficient and effective public transit system which includes an extensive rail system plus local and express buses. In 2000, 37 percent of Washington residents took public transportation to work, 12 percent walked, and four percent worked from home. Thirty-eight percent of the city's residents do not own a car. Average daily ridership on the Washington Metro was 588,500 in January 2001 and the average daily ridership on Metrobus was 473,900. While shared taxis do help to alleviate some traffic during rush hour, the metro area's highways and freeways would go from bad to worse if shared taxis were the only transportation alternative. Taxi cab rides would average more than \$20 one way for most suburban Oahu residents' homes to downtown Honolulu, which would be \$40 round trip. Even if shared with 3 other people that's \$10 per day or \$225 per month for most commuters.

73. (A) "A rapid transit system will not be likely to improve [traffic congestion], and such improvements should not be a major selling point for the system." Rutherford 1.5  
B) "...it is debatable whether any noticeable impact will occur on highway facilities ..." Rutherford 6.5  
C) "...estimates of fuel, pollution, and time savings on highway facilities are generally paper exercises that seldom occur in the real world." Rutherford 3.5  
D) "The Final Environmental Impact Statement should more clearly state that the primary benefit of rapid transit will be to substantially increase mobility for transit-dependent commuters." UH 3.7  
E) "...the primary benefit of rapid transit is not the reduction of automobile congestion. Rapid transit's primary benefit should be to substantially increase mobility for transit-dependent commuters." UH 24.3  
F) "...it appears that relatively few public benefits of any regional significance will result from any of the fixed guideway alternatives." Cervero 14.3  
G) "...it would be highly misleading to measure the success or failure of the proposed transit system solely on the basis of its ability to reduce auto congestion. To the extent that it increases the travel speed of current bus riders, who are slowed down by roadway congestion, this would be a benefit even if congestion levels on roadways did not fall at all. At least bus riders, who are not at all responsible for creating the congestion problem on the roads, would be less likely to suffer from it." Pucher 12.5  
H) "The only really effective way to reduce auto congestion is by raising the price of auto use ... and by giving traffic priority to buses and high occupancy vehicles." Pucher 12.4  
I) "In order to increase transit mode splits to the 20-30% range, a level that would begin to yield quite noticeable and important social and environmental benefits, some combination of the following initiatives would likely need to be introduced: increased fuel taxes and registration fee; elimination of free or heavily subsidized parking; introduction of an auto-restricted zone in the core area (such as practiced in Singapore); creation of HOV-lanes and contra-flow lanes that give buses operating on surface streets substantial speed advantages ..." Cervero 11.6  
Response: The comments cited are from early 1990 publications regarding the Honolulu Rapid Transit Project. This information is over ten years old and was prepared regarding a rail project. Over the past ten years the travel demand models and methodologies and other analytic tools (energy, air quality, etc.) have evolved and have been refined. Also, only part of the information is presented in the quotes.

(A) The conclusion actually states: "A rapid transit system will not likely to improve level of service on streets and highways, and such improvements should not be a major selling point for the system."

(B) The sentence actually states: "As mentioned in Question 1, it is debatable whether any noticeable impact will occur on highway facilities because of the large latent demand for auto travel in highly congested areas. I do not think the issue is important; instead, this system will increase non-auto mobility substantially in a low polluting, energy efficient, and cost-effective manner."

(C) The paragraph actually reads: "The basic model structure discussed in Section 3.7 of the Task 5 report is described as a 'nested logit model,' which first splits travelers between auto and transit and then estimates access modes to transit separately. This model structure is appropriate as long as people's choice patterns follow modal assumptions. If people must make a substantial tradeoff between being an auto passenger and a transit rider, this model structure may overestimate the number of actual automobiles taken off the road. In other words, the question is, what is the impact of auto occupancy when transit investments have proven elusive as the latent demand for auto use has filled slots vacated by transit riders. For this reason, estimates of fuel, pollution, and time savings on highway facilities are generally paper exercises that seldom occur in the real world."

(D) See response to comment #20, above.

(E) The paragraph actually reads: "In this regard, we agree with Rutherford who argued that the primary benefit of rapid transit is not the reduction of automobile congestion. Rapid transit's primary benefit should be to substantially increase mobility for transit-dependent commuters. If you accept that premise, then the most cost-effective alternative may not be the most beneficial to the transit-dependent population."

(F) The paragraph actually states: "Given that all of the alternatives would only increase regional transit mode splits only slightly above the No-Build option, it appears that relatively few public benefits of any regional significance will result from any of the fixed guideway alternatives. This suggests that only those alternatives with marginal costs per additional rider that begin to match the fares that users will pay should seriously be considered. Only alternatives 10 and 11 seem viable on these grounds."

(G) The beginning of the paragraph quoted states: "The percentage reduction in total auto travel probably will not be significant—under 10%, even in the short-run. In the long-run, the initial reduction in congestion and improvement in travel time will almost certainly disappear, as new travel demand is simulated by the more attractive travel conditions—i.e. less congestion—on roadways. The only really effective way to reduce auto congestion is by raising the price of auto use (for example, by higher gasoline taxes, higher motor vehicle registration fees, and higher parking fees and taxes) and by giving traffic priority to buses and high occupancy vehicles. Building a new transit system would produce travel benefits even if it does not reduce congestion levels on roadways, because more trips would obviously be served. Thus, ..."

(H) See (G) above.

(I) The end of the sentence quoted actually states: "...and the introduction of various land use incentives (e.g. density bonuses; transferable development rights; impact fee credits) that will cluster future development around transit stations and encourage a development pattern that closely conforms with fixed guideway transit."

74. A) I question the factoring of the transit trip table on the basis of population and employment growth, mainly because over the last decade Honolulu has shown rapid growth in everything but transit ridership ... This same pattern has been observed in many other U.S. cities." Rutherford 2.5

B) "...the rates of growth for transit have not been in lock step with population and employment growth." UH 31.9

C) The City's ... model assumes that growth in transit ridership can be related as a linear function to growth in population and employment. This is a simple assumption that the City made for convenience. Although we have reasons to doubt the validity of this assumption, we have no better substitute." UH 36.7

D) "The City's consultants used a 'pivot-point' methodology to project ridership for the different alternatives in the year 2005. This method, which was endorsed by UMTA, has only been used elsewhere for rail extension projects, rather than for a complete system." UH 2.2

E) The major weakness that reoccurs at several phases of the ridership forecasting methodology is the absence of validation against local data." Ben-Akiva 9.5.

F) "...no evidence is presented in the report on the validity of the ... tables." Ben-Akiva 2.8G)

H) "The report does not present data to support these assumptions." Ben-Akiva 2.8

I) "My conclusion is that the selected values for the parameters of the mode choice model have not been sufficiently justified." Ben-Akiva 7.7

J) "I question the validity of the forecasting procedure ..." Ben-Akiva 7.9

K) "I am not convinced that any of the models is 'transferable' to other situations and I would recommend not to use them without further testing." Ben-Akiva 8.7

L) "Any forecasting exercise of this nature would be associated with significant uncertainties." Ben-Akiva 9.8

M) "...it is possible that parallel bus routes that now provide better service to some will experience a reduction in service level ... it should be pointed out that several new guideway projects in the U.S. attempted to force an unnatural number of trips to the guideway, even for short segments of longer bus trips. Some systems actually had lower total transit ridership after a fixed guideway system was built." Rutherford 6.6

N) "Since the entire justification for the project rests on significant rates of electing public transportation over the private automobile, the failure to discover what would influence this choice may be a serious flaw." Canan 1.8

Responses: The comments cited are from early 1990 publications regarding the Honolulu Rapid Transit Project. This information is over ten years old and was prepared regarding a rail project. Over the past ten years the travel demand models and methodologies and other analytic tools (energy, air quality, etc.) have evolved and have been refined. Also, only part of the information is presented in the quotes.

A) This quote is from Review of Ridership for AADEIS Honolulu Rapid Transit Development Project by G. Scott Rutherford, Ph.D., P.E., Associate Professor of Civil Engineering, University of Washington and dated April 17, 1990. The quote actually reads, "I question the factoring of the transit trip table on the basis of population and employment growth, mainly because over the last decade Honolulu has shown rapid growth in everything but transit ridership. Faced with this trend,

it is inappropriate to increase the trip table merely on the basis of population and employment growth. From 1980 to 1987 population increased about 8 percent, motor vehicles 29 percent, and transit riders only 3 percent. This same pattern has been observed in many other U.S. cities." Rutherford 2.5

The transit trip table was developed using the current travel demand forecasting process used by the Oahu Metropolitan Planning Organization (OMPO). The transit trip table is not derived through a factoring procedure but through a fully calibrated nested LOGIT mode choice model calibrated using 1995 population and employment data. The year 2025 population and employment data used are the current OMPO year 2025 projections.

B) The paragraph states, "One can see from Figures 6 and 7 that the rates of growth for transit ridership have not been in lock step with population and employment growth." UH 31.9

Figures 6 and 7 referred to in the quote are graphs that plot annual bus passengers versus population on Oahu and annual bus passengers versus annual employment on Oahu, respectively. The general theme of the discussion surrounding these graphs is that there is not a linear correlation between bus passengers and either population or employment. As discussed in the response to comment #74A), future transit ridership is not determined through a factoring process but through OMPO's calibrated LOGIT mode choice model.

C) This quote reads, "The City's Fratar model assumes that growth in transit ridership can be related as a linear function to growth in population and employment. This is a simple assumption that the City made for convenience. Although we have reasons to doubt the validity of this assumption, we have no better substitute." UH 36.7

A Fratar model was not used to forecast future transit ridership. OMPO's calibrated LOGIT mode choice model was used.

D) This excerpt is quoted in its entirety. "The City's consultants used a 'pivot-point' methodology to project ridership for the different alternatives in the year 2005. This method, which was endorsed by UMTA, has only been used elsewhere for rail extension projects, rather than for a complete system." UH 2.2

A "pivot-point" method was not used to forecast the transit ridership for the alternatives. OMPO's calibrated LOGIT mode choice model was used.

E) and L) These excerpts are from Evaluation of Ridership Forecasting for the Honolulu Rapid Transit Development Project - Alternative Analysis and Draft Environmental Impact Statement, written by Dr. Moshe Ben-Akiva, Professor, MIT, and dated May 4, 1990. Ben-Akiva states, "The major weakness that reoccurs at several phases of the ridership forecasting methodology is the absence of validation against local data." Ben-Akiva 9.5. He concludes with, "Any forecasting exercise of this nature would be associated with significant uncertainties. My suggestions have been directed at some areas where uncertainties may be reduced and at others where their magnitude should be assessed" Ben-Akiva 9.8

OMPO's travel demand forecasting model was calibrated using 1995 data. Included in the model development was a detailed household interview survey that involved members of the household keeping a daily trip diary. The model was then used for the Oahu Regional Transportation Plan

(ORTP) Update approved by the OMPO Policy Committee in April 2001. The base year for the ORTP was the year 2000, and this study helped to validate the model to local conditions. Therefore, the weakness asserted by Ben-Akiva is no longer an issue.

F), G) and H) These quotes are contained in a section of the report that discusses base transit data. It actually reads, "The base year ridership data are obtained from the 1986 bus on-board survey. The report identifies several deficiencies in this survey that required: (f) some additional cleaning and recoding of the original survey records; (g) a recalculation of expansion weights; and (h) the use of an origin/destination rather than production/attraction format. It appears that a great deal of effort was invested in an attempt to overcome the limitations of this survey. However, no evidence is presented in the report on the validity of the resulting OD tables. It is assumed that the survey expansion is based on the total boardings by time of day, bus route, direction and route segment. But the level of accuracy of these boarding counts is not specified." Ben-Akiva 2.8  
"The report does not present data to support these assumptions." Ben-Akiva 3.4

The OMPO travel demand forecasting model used by the Primary Corridor Transportation Project to forecast travel demand used the more recent 1991 On-Board Bus Survey, TheBus Comprehensive Operations Analysis completed in 1993, and update transit data supplied by Oahu Transit Service (OTS), the operator of the municipal transit system, to calibrate the 1985 base year model. The model was validated as part of the ORTP Update study in 2001.

I) This quote pertains to Ben-Akiva's discussion of the parameters used in a later mode choice model used in the Honolulu Rapid Transit Project. The discussion focuses on the validity of using coefficients in the incremental LOGIT model that were developed for models used in other areas of the country. The quote is, "My conclusion is that the selected values for the parameters of the mode choice model have not been sufficiently justified." Ben-Akiva 7.7

As stated previously, the OMPO travel forecasting model was developed using detailed travel surveys and transportation information collected on Oahu. The model modules, including the incremental LOGIT model, were calibrated for local conditions.

J) and K) These quotes pertain to Ben-Akiva's evaluation of generated non-home based transit trips. These trips were modeled using model forms borrowed from Washington, D.C. The actual quotes are, "The concept of generated Non-Home-Based (NHB) transit trips by fixed guideway facilities is reasonable. The discussion of the similarities between Washington, D.C. and Honolulu is also reasonable. However, I question the validity of the forecasting procedure that was employed to capture this phenomenon." Ben-Akiva 7.9 He concludes by saying, "I am not convinced that any of the models is transferable to other situations and I would recommend not to use them without further testing." Ben-Akiva 8.7

The OMPO travel demand forecasting model was developed to help model non-home-based trips as well as home-based trips. As a result, the OMPO model utilizes 11 trip purposes, 4 of them relate to non-home-based trips. Data to calibrate the model for these trip purposes were collected using a survey with detailed household trip diaries and, therefore, reflect local travel behavior.

M) This is another quote from Review of Ridership for AA/DEIS Honolulu Rapid Transit Development Project by G. Scott Rutherford, Ph.D., P.E., Associate Professor of Civil Engineering, University of Washington and dated April 17, 1990. The actual quotes is, "It is possible that parallel bus routes that now provide better service to some will experience a reduction in service level. While this is a policy and resource issue to the transit agency, it should

be pointed out that several new guideway projects in the U.S. attempted to force an unnatural number of trips to the guideway, even for short segments of longer bus trips. Some systems actually had lower total transit ridership after a fixed guideway system was built." Rutherford 6.6

The Refined LPA is not a fixed guideway system. In fact, the more heavily used parallel bus routes are routed along the BRT transit lanes and are incorporated into the BRT system. In this way more riders will be able to take advantage of the faster speeds and improved reliability that the transit priority lanes will provide.

N) This excerpt is from a report entitled, Honolulu Rapid Transit Development Project, Alternatives Analysis/Draft Environmental Impact Statement, Social and Economic Impacts Review, by Penelope Canan, Ph.D., consultant, dated April 1990. In a critique of the Public Involvement Program for the Honolulu Rapid Transit Project she states, "Since the entire justification for the project rests on significant rates of electing public transportation over the private automobile, the failure to discover what would influence this choice may be a serious flaw." Canan 1.8

The choice of transit or auto mode is projected for all alternatives by the OMPO travel demand forecasting model. The nested LOGIT mode choice module was calibrated to local conditions based on detailed travel data collected as part of the modal development process. The selection of travel mode, therefore, reflects actual propensities by the local population to choose one mode over the other.

75. A) Perhaps what is most surprising, and to some extent alarming, about the alternatives presented is that few real choices are offered." Cervero 3.7

B) "...we think that the TSM alternative has not been adequately defined in the AA/DEIS." UH 17.4

C) "The range of alternatives considered in the AA/DEIS was disappointingly narrow and might have included other options." Rutherford 1.6

D) "I believe that it is vitally important to pay as close attention to the proper design of the TSM alternative as it is to design of the rail alternative before an informed decision can be made about whether and how to finance new rail transit." Shoup 12.9

E) "The proper specification of this [TSM] alternative is crucial, because it affects all the subsequent calculations of how many more riders the rail system will attract, and how much extra revenue will have to be raised to finance the rail system... it does not involve any other of the now common transportation demand management techniques that are an integral component of transportation system management. I would argue that the TSM alternative is inadequately specified, and thus that the contribution that TSM can make toward improving transportation is underestimated. If this is true, the improvements attributable to the rail alternatives are overestimated." Shoup 12.3

Response: To use quotes from a 1990 review of the then Rapid Transit Project, when the authors haven't even seen the current set of alternatives is totally improper.

76. COST COMMENT: Busways are used by the consultant here refers to grade-separated or barrier-separated lanes reserved for buses and high occupancy vans and cars. They are also sometimes referred to as transitways.

A) "In particular, what is lacking is a serious investigation of several viable dedicated busway options." Cervero 3.4

B) "Where the current set of alternatives really fall short is in ignoring various busway configurations as a fundamental option to rail transit." Cervero 5.4

# CORRECTION

THE PRECEDING DOCUMENT(S) HAS  
BEEN REPHOTOGRAPHED TO ASSURE  
LEGIBILITY  
SEE FRAME(S)  
IMMEDIATELY FOLLOWING

(ORTP) Update approved by the OMPO Policy Committee in April 2001. The base year for the ORTP was the year 2000, and this study helped to validate the model to local conditions. Therefore, the weakness asserted by Ben-Akiva is no longer an issue.

F), G) and H) These quotes are contained in a section of the report that discusses base transit data. It actually reads, "The base year ridership data are obtained from the 1996 bus on-board survey. The report identifies several deficiencies in this survey that required: (f) some additional cleaning and recoding of the original survey records; (g) a recalculation of expansion weights; and (h) the use of an origin/destination rather than production/attraction format. It appears that a great deal of effort was invested in an attempt to overcome the limitations of this survey. However, no evidence is presented in the report on the validity of the resulting OVD tables. It is assumed that the survey expansion is based on the total boardings by line of day, bus route, direction and route segment. But the level of accuracy of these boarding counts is not specified." Ben-Akiva 2.6 . "The report does not present data to support these assumptions." Ben-Akiva 3.4

The OMPO travel demand forecasting model used by the Primary Corridor Transportation Project to forecast travel demand used the more recent 1991 On-Board Bus Survey, TheBus Comprehensive Operations Analysis completed in 1993, and update transit data supplied by Oahu Transit Service (OTS), the operator of the municipal transit system, to calibrate the 1995 base year model. The model was validated as part of the ORTP Update study in 2001.

I) This quote pertains to Ben-Akiva's discussion of the parameters used in a later mode choice model used in the Honolulu Rapid Transit Project. The discussion focuses on the validity of using coefficients in the incremental LOGIT model that were developed for models used in other areas of the country. The quote is, "My conclusion is that the selected values for the parameters of the mode choice model have not been sufficiently justified." Ben-Akiva 7.7

As stated previously, the OMPO travel forecasting model was developed using detailed travel surveys and transportation information collected on Oahu. The model modules, including the incremental LOGIT model, were calibrated for local conditions.

J) and K) These quotes pertain to Ben-Akiva's evaluation of generated non-home based transit trips. These trips were modeled using model forms borrowed from Washington, D.C. The actual quotes are, "The concept of generated Non-Home-Based (NHB) transit trips by fixed guideway facilities is reasonable. The discussion of the similarities between Washington, D.C. and Honolulu is also reasonable. However, I question the validity of the forecasting procedure that was employed to capture this phenomenon." Ben-Akiva 7.9 He concludes by saying, "I am not convinced that any of the models is transferable to other situations and I would recommend not to use them without further testing." Ben-Akiva 8.7

The OMPO travel demand forecasting model was developed to help model non-home-based trips as well as home-based trips. As a result, the OMPO model utilizes 11 trip purposes, 4 of them relate to non-home-based trips. Data to calibrate the model for these trip purposes were collected using a survey with detailed household trip diaries and, therefore, reflect local travel behavior.

M) This is another quote from Review of Ridership for AA/DEIS Honolulu Rapid Transit Development Project by G. Scott Rutherford, Ph.D., P.E., Associate Professor of Civil Engineering, University of Washington and dated April 17, 1990. The actual quote is, "It is possible that parallel bus routes that now provide better service to some will experience a reduction in service level. While this is a policy and resource issue to the transit agency, it should

be pointed out that several new guideway projects in the U.S. attempted to force an unnatural number of trips to the guideway, even for short segments of longer bus trips. Some systems actually had lower total transit ridership after a fixed guideway system was built." Rutherford 6.6

The Refined LPA is not a fixed guideway system. In fact, the more heavily used parallel bus routes are routed along the BRT transit lanes and are incorporated into the BRT system. In this way more riders will be able to take advantage of the faster speeds and improved reliability that the transit priority lanes will provide.

N) This excerpt is from a report entitled, Honolulu Rapid Transit Development Project, Alternatives Analysis/Draft Environmental Impact Statement, Social and Economic Impacts Review, by Penelope Canan, Ph.D., consultant, dated April 1990. In a critique of the Public Involvement Program for the Honolulu Rapid Transit Project she states, "Since the entire justification for the project rests on significant rates of electing public transportation over the private automobile, the failure to discover what would influence this choice may be a serious flaw." Canan 1.8

The choice of transit or auto mode is projected for all alternatives by the OMPO travel demand forecasting model. The nested LOGIT mode choice model was calibrated to local conditions based on detailed travel data collected as part of the model development process. The selection of travel mode, therefore, reflects actual propensities by the local population to choose one mode over the other.

75. A) Perhaps what is most surprising, and to some extent alarming, about the alternatives presented is that few real choices are offered." Cervero 3.7

B) "...we think that the TSM alternative has not been adequately defined in the AA/DEIS." UH 17.4

C) "The range of alternatives considered in the AA/DEIS was disappointingly narrow and might have included other options." Rutherford 1.6

D) "I believe that it is vitally important to pay as close attention to the proper design of the TSM alternative as it is to design the rail alternatives before an informed decision can be made about whether and how to finance new rail transit." Shoup 12.9

E) "The proper specification of this [TSM] alternative is crucial, because it affects all the subsequent calculations of how many more riders the rail system will attract, and how much extra revenue will have to be raised to finance the rail system... it does not involve any other of the now common transportation demand management techniques that are an integral component of transportation system management. I would argue that the TSM alternative is inadequately specified, and thus that the contribution that TSM can make toward improving transportation is underestimated. If this is true, the improvements attributable to the rail alternatives are overestimated." Shoup 12.3

Responses: To use quotes from a 1990 review of the then Rapid Transit Project, when the authors haven't even seen the current set of alternatives is totally improper.

76. COST COMMENT: Buses are used by the consultant here refers to grade-separated or barrier-separated lanes reserved for buses and high occupancy vans and cars. They are also sometimes referred to as transitways.

A) "In particular, what is lacking is a serious investigation of several viable dedicated busway options." Cervero 3.4

B) "Where the current set of alternatives really fall short is in ignoring various busway configurations as a fundamental option to rail transit." Cervero 5.4

- C) "Quite aside from the neglect of low cost TSM alternatives, there is no exploration of the possibility of investing more in HOV lanes for buses and carpools, as an intermediate level of investment between the No-Build alternative and the rail alternatives." Shoup 12.8
- D) "The additional riders that might be drawing to busways (by virtue of the superior quality of service offered by buses feeding directly into neighborhoods) might more than make up any higher costs (if indeed cost estimates are accurate). If presented in terms of a more traditional benefit-cost framework, it is likely that busways would compare far more favorably with fixed guideway rail options." Cervero 4.9
- E) "The real advantage of busways ... is that they reduce ... transferring, the Achilles heel of mass transit in many modern, low-density metropolises like Honolulu." Cervero 4.3
- F) "... a TSM II could be considered that ... might include contraflow lanes, busways, reversible bus streets ..." Rutherford 7.2
- G) "In summary, I would recommend that an additional study be commissioned that seriously examined a range of busway options as legitimate contenders to the fixed guideway rail options." Cervero 5.3

Response: Comment noted. Again, the author is quoting information written about the Honolulu Rapid Transit Development Project over ten years ago. Because only one sentence, or a portion of a sentence are quoted, the reader is misled into the quoted authors' meaning. Also, since the quoted information was published, high occupancy vehicle lanes have been implemented on Oahu and more are planned. The BRT project is a busway project.

A) In the next two sentences after the one quoted, Dr. Cervero states: "This criticism, I believe, is less a reflection on the work of the consultants and more an outcome of pressures exerted by various political and special interest groups. The range of alternatives presented are built on several prior studies which established this corridor as the most potentially cost-effective one for building a fixed guideway system."

B) The last sentence of the paragraph is quoted. The prior information states: "In summary, I would recommend that an additional study be commissioned that seriously examined a range of busway options as legitimate contenders to the fixed guideway rail options. It is particularly important that intensified and significantly upgrade bus transit options be considered for Oahu in light of the fact that the bus system already in place has proven itself to be one of the most heavily utilized and cost-productive operations in the country. Given the solid base of bus services already in place, it would seem that various busway alternatives could be linchpins to creating a first-rate regional transit service. In terms of alignments and areas served, the alternatives presented seem well grounded. While extensions (e.g. to Ewa or Hawaii Kai) could be considered, the basis for limiting the analysis to the chosen corridor seems sound and well supported..."

C) The sentence following the one quoted states: "I realize that no analysis of alternatives can consider every option that anyone recommends, and it may be that the AADEIS considered a TSM alternative that was prespecified."

D) The last two sentences of the paragraph are quoted. The first of the paragraph states: "It should be mentioned that several smaller reports were prepared which addressed busway options: Report on Bus on Busways, prepared by the Department of Transportation Services of the City and County of Honolulu; and Expanded Bus/Fixed Guideway Mass Transit Alternatives, prepared by the Economic Development and Transportation Committee of the City and County of Honolulu. While on the same topic, it is interesting that the two studies reach different

conclusions - the former generally dismisses busways as a legitimate alternative while the latter strongly endorses them. The former seems almost like an alternative while the latter strongly endorses them. The former seems almost like an afterthought to the larger battery of studies done on rail transit while the latter comes across as a strong reaction to ignoring busways within the Alternatives Analysis. While steps in the right direction, both studies, I believe, fail to examine busways within the necessary scope or depth they deserve. The Report on Bus on Busways uses the results from the PEEP I and PEEP II analyses to conclude that busways would be costlier than fixed guideway over the long run, primarily in terms of higher operations and maintenance costs. This finding is a bit surprising in that it counters a considerable body of conventional wisdom that says, ceteris paribus, busways are cheaper than rail transit on a per kilometer basis (Meyer, et al., 1984; Peckreit, 1989; Kain 1990). Moreover, the analysis ignores the demand side of the equation."

E) Again, the author is only presenting part of the information quoted. The paragraph reads: "Busway options could range from a system of inter-connected HOV lanes and other preferential treatments (e.g. Houston) to newly constructed, exclusive busways (e.g., Ottawa). Even hybrids might be considered, like dual-modal-propulsion bus-rail systems (e.g. Essen, West Germany, Adelaide, Australia). Options could also vary with respect to geographic coverage, frequency and quality of service, and routing patterns. In contrast to a fixed guideway rail system, busways enable transit vehicles to perform both feeder (collection-distribution) and line-haul (trunkline) functions. The same vehicles connecting major terminuses and activity centers can also fill into neighborhoods to provide more convenient access. Park-and-ride facilities can be sealed back accordingly. Thus, the real advantage of busways, at least from a ridership standpoint, is that they reduce the incidence of transferring, the Achilles heel of mass transit in many modern, low-density metropolises like Honolulu. Clearly, several gradations of busway options would offer a striking contrast to alternatives 2-11, all of which rely heavily on motorist park-and-ride as the primary form of collecting and distributing passengers. A well conceived set of busway options would provide decision-makers with a bonafide set of alternatives, many of which would have noticeable different costs and benefits, in which to debate and eventually work toward a consensus."

F) Dr. Rutherford's paragraph that is partially quoted states: "The TSM option appears to be 'born to lose', as most TSM options are in alternatives analyses. Since the TSM option, by definition, needs to be lower cost, a TSM II could be considered that showed what \$1 billion would buy for a different type of service. Elements might include:

- bus tunnels and bridges,
- contraflow lanes,
- busways,
- reversible bus streets,
- bus stations integrated with land use,
- free service,
- employer bus passes,
- visitor passes,
- wider application of park-and-ride with express buses, and
- services at park-and-ride lots such as daycare, retail stores, and automotive facilities and services."

G) The sentence quoted is the first of the paragraph which states: "In summary, I would recommend that an additional study be commissioned that seriously examined a range of busway options as legitimate contenders to the fixed guideway rail options. It is particularly important that

Mr. Cliff Slater  
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intensified and significantly upgrade bus transit options be considered for Oahu in light of the fact that the bus system already in place has proven itself to be one of the most heavily utilized and cost-productive operations in the country. Given the solid base of bus services already in place, it would seem that various busway alternatives could be the linchpins to creating a first-rate regional transit service. In terms of alignments and areas served, the alternatives presented seem well grounded. While extensions (e.g., to Ewa or Hawaii Kai) could be considered, the basis for limiting the analysis to the chose corridor seems sound and well supported. Where the current set of alternatives really fall short is in ignoring various busway configurations as a fundamental option to rail transit.

77. Buses and Vanpools.

- A) "I do not believe a sufficient number of significant high-quality mass transit alternatives have been considered for Oahu." Carvero 3.3  
B) COST COMMENT: Mass transit is used here with its normal meaning of vehicles moving people en masse such as in trains, buses, vans or taxis. By brilliant PR, the city has managed to co-opt it to solely mean rail transit.  
C) "It is particularly important that intensified and significantly upgraded bus transit options be considered for Oahu in light of the fact that the bus system already in place has proven to be one of the most heavily utilized and cost-productive operations in the country." Carvero 5.3  
D) Other TSM strategies, such as those involving regional vanpool services, timed-transfer bus facilities, and auto-restraint measures, are ignored." Carvero 3.9

Response: It is not clear why these quotes were chosen since they support features that are embodied in the Refined LPA, namely an "intensified and significantly upgraded bus transit option", with a "timed transfer" hub-and-spoke network.

78. Political Considerations.

- A) "This criticism [of the City's TSM alternative], I believe, is less a reflection on the work of the consultants and more an outcome of pressures exerted by various political and special interest groups." Carvero 3.4  
B) COST COMMENT: This may be acknowledging that Parsons, Brinckerhoff, the City's consultant for the Alternatives Analysis is also one of the nation's primary authorities on busways. They are the authors of High Occupancy Vehicle Facilities, December 1990.  
C) "The TSM option appears 'born to lose,' as most TSM options are in alternatives analyses." Rutherford 7.2  
D) "As presented, the alternatives give the impression that a fixed guideway rail system, be it light or heavy rail, was pre-established at the outset to be the preferred high-capacity transit technology for Oahu." Carvero 3.8

Response: There was no pre-determined outcome, nor was there political pressure exerted on the consultants. The selection of the Locally Preferred Alternative was based on extensive quantitative analyses and public input. These analyses are documented in the FEIS.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE YEMOTO  
DEPUTY DIRECTOR

TPD02-00628

November 13, 2002

Mr. Tom Smyth  
P. O. Box 2359  
Honolulu, Hawaii 96804

Dear Mr. Smyth:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. I won't take personal offense to the fact that you overlooked the dozen or so other elected officials that are here today. Mr. Bren has already spoken. But I'm speaking now, of course, of those neighborhood board members who are equally elected and who serve without compensation, and who I think deserve some recognition for the fact that they're representing their communities in meetings like this.

Response: We apologize and did not intend to offend the elected neighborhood board members that took the time to attend the public hearing.

2. I'm a member of the Downtown Neighborhood Board, who's been an Oahu resident for nearly 30 years, downtown resident in Kakaako and Downtown area for about 20 years. The Downtown Neighborhood Board took a position early on, when this project was first presented, to support it generally, and we are the most affected by it, because all the routes, all of the routes, go through Downtown. They bring people in and take them out. We're affected by the lack of a system like this, by the traffic congestion that occurs in Downtown.

Response: This is a background comment that does not require a response.

3. We had three specific concerns at the time the project was presented: A) The so-called Richards Makai portion of the Kakaako Mauka routing, which has been corrected; B) the two-lane Halekauwila routing from Richards to Punchbowl, which has not been; and finally C) the makai curbside routing along Ala Moana Park, replacing parking spaces that are very much needed on the weekends for people using the mauka portion of the park.

Response: This is a factual statement not requiring a response.

4. As to this being a stealth project, I disagree totally. I can't think of a project that's had more public meetings, more public input, more public participation. I understand that more people would have been here today. The opponents were going to bus people in, but there was already to much traffic Downtown.



Mr. Tom Smyth  
Page 2  
November 13, 2002

**Response:** We appreciate you recognizing the community involvement efforts that have been associated with the project.

5. *Finally, as the only certified public - or certified economic developer in the state of Hawaii, I would say categorically that businesses do better as people are more mobile. Businesses will prosper in the area served by the system. They won't suffer. I think that's a given, and that's an argument that needs to be laid aside. So we think this helps local business.*

**Response:** Comment noted. No response required.

6. *It certainly helps local residents. It certainly helps those of us who live Downtown to go out of town. We speak only of traffic coming in the morning and going home at night. But, in fact, with the Keppole development, it's going to go much more in the opposite direction. A BRT system offers that flexibility which highways don't.*

**Response:** Thank you for supporting the project and sharing your views regarding the benefits of BRT.

We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

McMillan, Cindy

From: Standiff@aol.com  
Sent: Saturday, October 21, 2000 5:25 AM  
To: cmmillan@co.honolulu.hi.us  
Subject: Aloha! Here is a comment on the BRT proposal: Mahalo.

Aloha, Cindy,

Thank you for our telephone conversation this morning. My day got busy, and I did not have a chance to e-mail you this right away.

I have some comments on the proposed Bus Rapid Transit concept, which I would like to ask you to forward to Director soon and to any others you feel should receive it.

Thanks a lot,  
Richard (see below)

To Whom it May Concern:

I have reviewed an abstract of the proposed Bus Rapid Transit system proposal, and would like to convey these thoughts:

Being originally from the Bay Area of CA, I have the following observations about BART: it never took away from the roadway system. Either it went above or below ground, or when it was at grade, it was placed in areas where there was room to add it to the median without removing traffic lanes. Further, it allowed for huge parking lots at each major outlying station, so "parking and BARTing" is a real possibility.

The BRT System appears to take away from several major Diamond Head-Ewa roadways, such as South King, Kapiolani, and Ala Moana. Since we still depend very heavily on the auto, and I have sincere doubts that the BRS will remove sufficient auto traffic to compensate for the traffic lanes removed, I am afraid that BRS will contribute to the congestion problem. The concept of making things so bad that you force people out of automobiles is a very counterproductive method (in these days of productivity gains, one has to couch this thought using the term "anti-productivity". Do we want to impose another economic competitiveness handicap upon Honolulu?

Honolulu is long and thin, and east-west traffic has always been the main problem. Removing more lanes in this direction simply contributes to the ongoing arteriosclerosis we have--the body of Honolulu is trying to race faster, but the blood supply is being reduced by continued narrowing of the arteries.

I have not been able to study BRT very well, but one thing that could

Comments on BRT for Council Transportation Committee

amalgamate this difficulty somewhat is if there were small, frequent circulator vans (cheap, say for a quarter) that folks could take to get around the downtown area. Then more people could feel that they could leave their car at home and not be paralyzed in town.

Another measure needs coordination with the State DOT (and cooperation thereof) in connection with SR 125, which is intended to look at means of enhancing the capacity of the central H-1 corridor (in conjunction with additional HOV--diamond--lanes). This would allow larger numbers of commuters to reach Honolulu in fewer vehicles, with less horrendous traffic jams. There are reasonable ways to add a "shoulder lane" to the central H-1 corridor for use during rush hour, but DOT does not seem to be acting on SR 125. I understand that projects such as H-1 capacity enhancement must be made into a document for submission to the Federal government by December this year, or they will be out of consideration for another 5 years.

Thank you for considering these comments.

Sincerely,  
Richard C. Stanciliff

Thank you for holding and inviting me to the Tuesday Transportation Committee hearing on the proposed BRT system. Unfortunately, I will be off-island and unable to attend.

Being originally from the Bay Area of CA, I have the following observations about BART, the Bay Area Rapid Transit: it never took away from the roadway system. Either it went above or below ground, or when it was at grade, it was placed in areas where there was room to add it to the median without removing traffic lanes. Further, it allowed for huge parking lots at each major outlying station, so "parking and BARTing" is a real possibility.

The BRT System appears to take away from several major Diamond Head-Ewa roadways, such as South King, Kapiolani, and Ala Moana. Since we still depend very heavily on the euro, and I have sincere doubts that the BRS will remove sufficient auto traffic to compensate for the traffic lanes removed, I am afraid that BRS will contribute to the congestion problem. The concept of making things so bad that you force people out of automobiles is a very counterproductive method (in these days of productivity gains, one has to couch this thought using the term "antiproducity". Do we want to impose another economic competitiveness handicap upon Honolulu?

Honolulu is long and thin, and east-west traffic has always been the main problem. Removing more lanes in this direction simply contributes to the ongoing arteriosclerosis we have--the body of Honolulu is trying to race faster, but the blood supply is being reduced by continued narrowing of the arteries.

I have not been able to study BRT very well, but one thing that could ameliorate this difficulty somewhat is if there were small, frequent circulator vans (cheap, say for a quarter) that folks could take to quickly get around the downtown area. Then people could feel that they could leave their car at home and not be paralyzed in town.

Another measure needs coordination with the State DOT (and cooperation thereof) in connection with SR 125, which is intended to look at means of enhancing the capacity of the central H-1 corridor (in conjunction with additional HOV--diamond--lanes). This would allow larger numbers of commuters to reach Honolulu in fewer vehicles, with less horrendous traffic jams. There are reasonable ways to add a "shoulder lane" to the central H-1 corridor for use during rush hour, but DOT does not seem to be acting on SR 125. I understand that projects such as H-1 capacity enhancement must make it into a document for submission to the Federal government by December this year, or they will be out of consideration for another 5 years.

Thank you for considering these comments.

Sincerely,  
Richard C. Stanciliff, 1107 Piikoi St, #16, Honolulu, HI 96814; (809)782-4322

*Richard C. Stanciliff*

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE "GEORGE" MIYAMOTO  
COUNTY DIRECTOR

TPD002-00629

November 13, 2002

Mr. Richard C. Stanciff  
1107 Piikoi Street, #16  
Honolulu, Hawaii 96814

Dear Mr. Stanciff:

Subject: Primary Corridor Transportation Project

This is in response to your October 21, 2000 e-mail and November 13, 2000 fax regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. *Being originally from the Bay Area of CA, I have the following observations about BART: It never took away from the roadway system. Either it went above or below ground, or when it was at grade, it was placed in areas where there was room to add it to the median without removing traffic lanes.*

**Response:** Previous studies have shown that construction of a subway through Honolulu's urban core would be prohibitively expensive due to disruption of existing underground utilities and constant dewatering required due to high water table and poor soils.

A fully grade-separated aerial transit alternative was also considered and eliminated due to its high costs and physical and visual impacts.

The decision to utilize an at-grade system for all of the alternatives was therefore made for the purposes of minimizing right-of-way impacts and keeping costs affordable. Due to right-of-way constraints and insufficient space in existing roadway medians or non-existent medians, the Refined LPA includes a mixture of shared-use lanes and exclusive BRT lanes for the In-Town BRT portion of the alignment.

2. *Further, it allowed for huge parking lots at each major outlying station, so "parking and BARTing" is a real possibility.*

**Response:** Additional park-and-ride facilities to include approximately 3,600 parking spaces are being planned at various locations on Oahu, as part of or in concert with the Refined LPA.

3. *The BRT System appears to take away from several major Diamond Head-Ewa roadways, such as South King, Kapiolani, and Ala Moana. Since we still depend very heavily on the auto, and I have sincere doubts that the BRS will remove sufficient auto traffic to compensate for the traffic lanes removed, I am afraid that BRT will contribute to the congestion problem.*

**Response:** It is not the conversion of lanes that will create the congestion. The congestion for motorists will be there without the BRT. When people are diverted onto public transit, congestion

Mr. Richard C. Stanciff  
Page 2  
November 13, 2002

for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

4. *The concept of making things so bad that you force people out of automobiles is a very counterproductive method (in these days of productivity gains; one has to couch this thought using the term "anti-productivity". Do we want to impose another economic competitiveness handicap upon Honolulu?*

**Response:** The concept is not to force people out of their cars by making things so bad. The forecast is that congestion will occur without BRT. The difference being that with the Refined LPA people will at least have an option that reduces the delays resulting from the congestion.

5. *Honolulu is long and thin, and east-west traffic has always been the main problem. Removing more lanes in this direction simply contributes to the ongoing arteria/corridor we have - the body of Honolulu is trying to race faster, but the blood supply is being reduced by continued narrowing of the arteries.*

**Response:** See response to comment #3.

6. *I have not been able to study BRT very well, but one thing that could ameliorate this difficulty somewhat is if there were small, frequent circulator vans (cheap, say for a quarter) that folks could take to quickly get around the downtown area. Then more people could feel that they could leave their car at home and not be paralyzed in town.*

**Response:** Part of the hub-and-spoke network in the Refined LPA would comprise circulators in the urban core that connect with the BRT stops to serve destinations beyond walking distances from the alignment.

7. *Another measure needs coordination with the State DOT (and cooperation therefrom) in connection with SR 125, which is intended to look at means of enhancing the capacity of the central H-1 corridor (in conjunction with additional HOV-diamond-lanes). This would allow larger numbers of commuters to reach Honolulu in fewer vehicles, with less horrendous traffic jams. There are reasonable ways to add a "shoulder lane" to the central H-1 corridor for use during rush hour, but DOT does not seem to be acting on SR 125. I understand that projects such as H-1 capacity enhancement must make it into a document for submission to the Federal Government by December this year, or they will be out of consideration for another 5 years.*

**Response:** The OMPD TOP 2025 Plan includes numerous projects in addition to the Regional BRT for enhancing the people carrying ability of the H-1 freeway.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

APR 20 2002

4/20/02

Ms. Cheryl Soon  
Director  
Department of Transportation Services  
City and County of Honolulu  
Honolulu, HI 96813

RE: Bus Rapid Transit- SDEIS

My name is David Stanton and I support the BRT. I frequently take the bus between my residence in Aiea and Iolani School which I attend. It takes me approximately 1 hour and 30 minutes to make this trip now.

We don't need more cars clogging the streets. What we need is an efficient affordable way for students and other members of the public to get to our daily destinations. Please think of the students like me who would greatly benefit from the faster bus service the BRT would provide.

Sincerely,



David Stanton  
98-616 Nohoalii St.  
Aiea, HI 96701

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE KECOMI MATAMOTO  
DEPUTY DIRECTOR

TPD02-00630

November 13, 2002

Mr. David Stanton  
98-616 Nohoalii Street  
Aiea, Hawaii 96701

Dear Mr. Stanton:

Subject: Primary Corridor Transportation Project

This is in response to your April 20, 2002 letter regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. My name is David Stanton and I support the BRT. I frequently take the bus between my residence in Aiea and Iolani School which I attend. It takes me approximately 1 hour and 30 minutes to make this trip now.

Response: This comment is background information that does not require a response.

2. We don't need more cars clogging the streets. What we need is an efficient affordable way for students and other members of the public to get to our daily destinations. Please think of the students like me who would greatly benefit from the faster bus service the BRT would provide.

Response: Comment noted. Thank you for supporting the project.

We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 523-4339 • Fax: (808) 523-4730 • Internet: www.cc.honolulu.gov

JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE "KEO" MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00631

November 12, 2002

Ms. Linda Starr  
P. O. Box 240310  
Honolulu, Hawaii 96824

Dear Ms. Starr:

Subject: Primary Corridor Transportation Project

This is in response to your testimony at the October 12, 2000 formal Public Hearing regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. *But when I read the document, one thing that I noticed is that it is written with the conclusion in mind already and building backwards.*

**Response:** The alternatives were treated in a balanced manner in the MIS/DEIS. It is a federal requirement that all alternatives be treated in a balanced manner and the MIS/DEIS was prepared to ensure that this "balanced treatment" requirement is met. A complete description and comparison of the No-Build Alternative, Transportation System Management (TSM) Alternative, and Bus Rapid Transit (BRT) Alternatives were discussed in the MIS/DEIS.

2. *What I'd like to see in this document is for the TSM to be further expanded.*

**Response:** Comment noted. Not enough detail is given on how the TSM should be expanded.

3. *One of the things would be to flesh out more transit centers. We want to keep people from getting into their cars. Once they get into their car, they're committed to their car. They don't want to drive their car, park it, get out, and catch the bus, and get off the bus, and catch another bus, and get onto a train, catch a train, or whatever. We want to make it so that there's more buses that will pick them up at the doorstep, take them to the transit center, so they don't have to get into the cars.*

**Response:** The Refined LPA includes many ways transit riders can access the system (i.e., by walking, bicycle, and auto). Since bringing buses within walking distance of all residents is not feasible, park-and-rides (free standing and at some of the transit centers) are also being proposed.

4. *And also, for pollution, it assumes that people are still going to be driving gasoline-powered cars. Today, we have companies that have hybrid electric cars. Who knows? In 25 years, all cars would be electric, and then you won't have the pollution.*

Ms. Linda Starr  
Page 2  
November 13, 2002

**Response:** We agree that in the future there may be less polluting fuel sources available for cars than gasoline. However, pollution would be reduced further by the implementation of the Refined LPA utilizing the candidate technologies, including an embedded plate system or a hybrid electric propulsion system.

5. *And I would prefer the TSM. And to make it work, to improve the way it works, what I recommend is that you explore the possibility of building bus bays so that buses can pull up so that the traffic can flow freely when the buses are stopping to pick up people.*

**Response:** As part of the Refined LPA bus turnouts will be constructed along selected sections of the In-Town BRT alignment to facilitate the free flow of traffic as the bus stops to drop-off and pick-up passengers.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

APR 20 2002

Comments to BRT

Thank Mr. Chair, Mayor Harris, City Council members and the guests for allowing me to speak. My name is Joel Stauring. I am the Planning, Zoning, and Transportation Chair of the McCully-Mo'ili'i Neighborhood Board. I have come to speak on a resolution our board passed back in November of 2000. This resolution was passed at that time and several of the issues still have not been addressed or answered.

3. We question the logic and arguments presented for an in-town fixed rapid transit system supported by a hub and spoke bus system to a redesigned Middle Street terminus. We suggest that a rapid transit system from the outlying country areas to a Middle Street terminus that would connect riders to bus expresses into the urban core should be open to further exploration and discussion.

I want to bring out two points from this statement. First, why do we need a system to take the valuable road space in town when there is an excellent bus system already in place? Secondly, our neighborhood does not want to see upward development. There has not been one transit system that has not caused higher density development along its corridor.

9. We recommend that a study be undertaken by an independent company for the proposed BRT and the Major Investment Study Draft Environmental Impact Statement MIS/DEIS.

I add, look what happened at Euron and Arthur Anderson; I believe everyone would like to see an independent study conducted.

10. We recommend the development of an urban Honolulu traffic management plan before proceeding with a fixed rail transportation system.

Lastly, I personally want to bring up the issue of cost of over \$1 Billion dollars. Coming from the finance and investing profession I can tell you an increase this large in the debt ratio may cause Moody's and Standards & Poor to drop the bond ratings for the City. This will force the City to issue bonds at higher interest rates for future CIP projects. This translates to more costs to operate the city, causing an increase in taxes.

I foresee the city may raise vehicle registrations to try to recoup the costs of this project and encourage motorists out of their automobiles and onto the BRT.

POSITION OF THE  
McCULLY-MO' ILI' ILI NEIGHBORHOOD BOARD NO.8  
ON THE  
BUS RAPID TRANSPORTATION PLAN

November 2, 2000

The McCully-Mo'ili'i Neighborhood Board No. 8 submits the following comments regarding the proposed Transportation Plan to the City Council of Honolulu and The City Administration.

1. The proposed dedicated fixed tram routes through McCully-Mo'ili'i as communicated by the City Administration via the Department of Transportation Services as the preferred route voiced by McCully-Mo'ili'i residents during the Trans 2K community meetings were never supported by participants from our neighborhood. We do not understand the basis for this statement by the City Administration via the Department of Transportation Services.
2. The Major Investment Study Draft Environmental Impact Statement MIS/DEIS is deficient in its economic analysis on alternative modes of transportation and its impact on private transportation systems. The Board takes a cautious approach in supporting a transportation monopoly.
3. We question the logic and arguments presented for an in-town fixed rapid transit system supported by a hub and spoke bus system to a redesigned Middle Street terminus. We suggest that a rapid transit system from the outlying country areas to a Middle Street terminus that would connect riders to bus expresses into the urban core should be open to further exploration and discussion.
4. Due to conflicting statistical information, we question the immediate necessity to make a decision on establishing a dedicated fixed route system.
5. We question whether the City has maximized the potential of the current bus system. We are pleased that the City is investigating alternative forms of energy for the BRT; likewise, we suggest that buses in the future could be powered by photovoltaic and fuel cells.

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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JEREMY HUDSON  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE 'NEO' NIYALAKOTO  
DEPUTY DIRECTOR

TPD002-006632

November 13, 2002

Mr. Joel Stauring  
2323 A Line Street  
Honolulu, Hawaii 96826

Dear Mr. Stauring:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, 2002 public hearing and your April 20, 2002 letter regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. *I'm the Planning, Zoning, and Transportation chair for the McCully-Mo'ili'i Neighborhood Board. In November of 2000, our board passed a resolution opposing the BRT in our area. I would like to take a few minutes - I guess a minute to discuss some of the points in the resolution.*

Response: Thank you for attending the public hearing and sharing your thoughts regarding the project.

2. *We, the board, question the logic and arguments presented for a in-town fixed rapid transit system supported by a hub-and-spoke bus system to a redesigned Middle Street terminus. We suggest that a rapid transit system from the outlying county areas to a Middle Street terminus that would connect riders to bus expresses into the urban core should be open to further exploration and discussion.*

Response: An LPA has already been selected in November 2000.

3. *One of the points I wanted to bring out was that we do not oppose this BRT in outlying areas. We think it will help and enhance those areas. But in town, in our neighborhood, it will congest it more. The bus system is a great system, and we believe it works within those areas.*

Response: Chapter 4 of the FEIS fully discusses the consequences of converting selected general purpose lanes to priority use by transit vehicles.

When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

4. *The second thing I wanted to bring up is that our neighborhood is opposed to upward development. All transit systems have seen that higher density developments have gone in along the corridor of bus rapid transit - I'm sorry - against where transit systems have been brought in. And so we oppose that in our area.*

6. We believe the MIS/DEIS does not adequately address 21st Century communication systems and its impact on a work force traditionally reliant on transportation to and from an established work center.

7. The City states that the transportation system will dictate future development for the PUC. We believe the MIS/DEIS does not adequately address social and environmental impacts related to development and growth. We believe transportation, planning, zoning, and water resource allocation are inseparable in planning urban growth, and thus believe that an EIS should be prepared with these four components as a sum of the total rather than as individual denominations. We believe segmenting these four components, while perhaps legal under the law, is ultimately detrimental in determining our vision for the future, and ensuring the quality of life we desire for our community of McCully-Mo'ili'i.

8. We believe that transportation should be developed to help level the economic playing field for small landowners and businesses. We do not believe the Honolulu transportation system should subsidize large investors and landowners at the expense of Hawaii's taxpayer.

9. We recommend that a study be undertaken by an independent company for the proposed BRT and the MIS/DEIS.

10. We recommend the development of an urban Honolulu traffic management plan before proceeding with a fixed rail transportation system.

11. We note that the general public has been given very little time to fully study and comprehend the enormity of the proposals, especially in its impact to development as proposed in the City's Draft Primary Urban Center Development Plan.

12. There are too many unanswered questions for the Board to take the next step in supporting a billion dollar BRT transportation venture.

13. The McCully-Mo'ili'i Neighborhood Board support further studies to analyze financial, social and environmental impacts for fixed rail transportation systems.

14. We are able to support the Transportation System Management Alternative number 2.

John Kato, Chairperson  
McCully-Mo'ili'i Neighborhood Board No. 8.

Mr. Joel Stauring  
Page 2  
November 13, 2002

**Response:** By itself, the In-Town BRT would have little influence on land use development in the PUC. In order for higher density development to occur, a number of factors in addition to good access need to occur. These factors include supportive land use/zoning policies; adequate parcel sizes; favorable land costs; and demonstrated market demand for the proposed project in that location.

5. **We recommend that a study be undertaken by an independent company for the proposed BRT and the Major Investment Study Draft -- Major Investment Study.**

**Response:** A multitude of independent consultants have been and will continue to be involved in analyzing the impacts and costs of the project.

6. **I'd add, look at what happened to Enron and Arthur Anderson. I believe everyone would agree that we need to have an independent study conducted to look over those figures.**

**Response:** Comment noted. We disagree that the Primary Corridor Transportation Project and the Enron/Arthur Anderson situation are similar.

7. **We recommend the development of an urban Honolulu traffic management plan before proceeding with a fixed rail transportation system.**

**Response:** A Honolulu traffic management plan is a good idea. The Transportation for Oahu Plan (TOP 2025) approved by the Oahu Metropolitan Planning Organization (OMPO) on April 6, 2001 provides a long-range perspective for the entire island. The Honolulu urban area has been evaluated through several sub-area studies. A Honolulu traffic management plan would help to unify the results of these studies.

As a point of clarification, the Refined LPA does not propose fixed-rail transit. Instead, it proposes a more flexible bus rapid transit (BRT) system that utilizes rubber-tired vehicles running in a combination of exclusive, semi-exclusive, and mixed-flow roadway lanes.

8. **Lastly, I personally want to bring up the issue of the cost of over \$1 billion, and that is in 1995 - or 1998 money. When we pay it out, it will be well over that due to inflation. Coming from a finance profession, I can tell you that the increase in large debt ratio will cause - or may cause Moody's and Standard & Poor's to drop the bond ratings for the City, which will cause increased interest rates and future - for future CIP projects. This translates to more costs to operate the City, causing an increase in taxes.**

**Response:** The cost of the project is paid for with a combination of federal and local revenue sources. 64 percent of the project is paid for by federal sources. The \$369.9 million dollars in General Obligation bond proceeds, to be spent over a 14 year period, is well within the capacity of the City as measured by rating agencies and the City's Debt and Financial Policies as passed by the City Council in April 2002.

9. **I also foresee the City may raise vehicle registrations to try to recoup the costs of the project and to encourage motorists out of their automobiles and onto the BRT.**

**Response:** Comment noted. The MISDEIS, SDEIS, and FEIS Chapter 6 discuss the project financing, which does not include raising vehicle registration fees.

Mr. Joel Stauring  
Page 3  
November 13, 2002

10. **We question the logic and arguments presented for an in-town fixed rapid transit system supported by a hub and spoke bus system to a redesigned Middle Street terminus. We suggest that a rapid transit system from the outlying country areas to a Middle Street terminus that would connect riders to bus expresses into the urban core should be open to further exploration and discussion.**

**I want to bring out two points from this statement. First, why do we need a system to take the valuable road space in town when there is an excellent bus system already in place? Secondly, our neighborhood does not want to see upward development. There has not been one transit system that has not caused higher density development along its corridor.**

**Response:** The Regional BRT will provide service between Kepoiei and the Middle Street Transit Center, where people can continue into town on that bus, or connect to local buses or the In-Town BRT system. The BRT will carry more people than single-occupancy vehicles and give Honolulu residents another transportation mode to use when making trips. The BRT alone will not result in development, but will help give access to neighborhoods.

11. **We recommend that a study be undertaken by an independent company for the proposed BRT and the Major Investment Study Draft Environmental Impact Statement MISDEIS.**

**I'd add, look what happened at Enron and Arthur Anderson; I believe everyone would like to see an independent study conducted.**

**Response:** See responses to comments # 5 and #6.

12. **We recommend the development of an urban Honolulu traffic management plan before proceeding with a fixed rail transportation system.**

**Response:** See response to comment #7.

13. **Lastly, I personally want to bring up the issue of cost of over \$1 Billion dollars. Coming from the finance and investing profession I can tell you an increase this large in the debt ratio may cause Moody's and Standard & Poor to drop the bond ratings for the City. This will force the City to issue bonds at higher interest rates for future CIP projects. This translates to more costs to operate the city, causing an increase in taxes.**

**Response:** See response to comment #8.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6076. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director



RECEIVED

02 MAY 9 11:25

May 6, 2002

DIRECTOR'S OFFICE  
DEPARTMENT OF TRANSPORTATION SERVICES  
Cheryl A. Stephenson  
1777 Ala Moana Blvd. #739  
Honolulu, HI 96815

Cheryl D. Soon, Director  
Department of Transportation Service  
City and County of Honolulu  
650 S. King Street, 3rd floor  
Honolulu, Hawaii 96813

Dear Ms. Soon:

Re: Primary Corridor Transportation Project  
Supplemental Draft Environmental Impact Statement

I have recently consulted Traffic Engineers from Charlotte, N.C. and Chicago, Illinois in an effort to answer my questions regarding Bus Rapid Transit. Mr. William Finger, Traffic Engineer for Charlotte, N. C. told me that there are a number of successful Rapid bus systems, most notably Yuwa, Curitiba, Pittsburgh, Euclid, and Eugene. The key to success, according to Mr. Finger, is dedicated bus lanes. "Riding the bus must be faster than driving". Mr. Tom Kaesser, Traffic Engineer for Chicago, told me of a miserable failure in the early '80's where counterflow bus lanes were attempted on 'one way' streets. Numerous accidents occurred both at intersections and mid-block, resulting in lawsuits against the city and at least one fatality. "The streets were well marked with warning signs and paint, but it didn't help. The counterflow bus lanes were subsequently removed".

Please answer the following questions for me:

- 1) If, according to experts, riding a bus must be faster than driving in order to be called rapid, how can the Primary Corridor Transportation Project be called rapid? The buses in this plan do not travel faster than traffic.
- 2) You have stated that bus riders will cut 3 min. from their commute time in certain areas on this system. I see this as a deliberate attempt to fool the public because a time savings of this nature can, and will be accomplished simply by skipping or removing stops. Buses will not be moving faster than cars, so please explain for me how this system will meet the rapid criteria?
- 3) My investigation of counterflow bus lanes on 'one way' streets has proven to me that such implementation would be an extreme safety hazard. Please site specific examples of successful counterflow situations on 'one way' streets. (Chicago found that by simply removing a few stops in the desired direction they were able to accomplish the same time savings-Again, we are not talking rapid, but rather a system of express buses.

I have been told by experts that \$1,000,000,000 is over the top for a bus system that does not meet the description of rapid. What would be your reasoning for deliberately deceiving the public, your City Council, the FTA, and the OAQ? Is your intent simply to "capture Federal money" as a recent BRT newspaper advertisement suggests. Is this a 'get the money now, worry about the system later' scheme? I look forward to your comments.

Sincerely,



Cheryl Stephenson

cc: Ms. Donna Turchie FTA  
201 Mission Street Suite 2210A  
San Francisco, California 94105-1839

Genevieve Saimonson OEOC  
235 Beretania Street, Suite 702  
Honolulu, HI 96813

Honolulu City Council

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

630 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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CHERYL D. SOON  
DIRECTOR

GEORGE "KECKO" UYAMOTO  
DEPUTY DIRECTOR

TPD502-01885R

November 13, 2002

Ms. Cheryl A. Stephenson  
1777 Ala Moana Boulevard, #739  
Honolulu, Hawaii 96815

Dear Ms. Stephenson:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the Public Hearing on April 20, 2002, and your May 6, 2002 letter regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. I'd like to confine my comments to the City budget. On Thursday, we read in the newspaper that there's a moratorium on swimming pools considered because the City lacks money for maintenance. And a quote from Ann Kobayashi says, "When a pool goes in, we should plan ahead and see that we have the money to operate and maintain it." I see a lot of quotes about pay for systems and that there will be no new taxes for the systems. But I don't see a lot of print about how we're going to pay for the maintenance. If we can't pay for public swimming pool maintenance, how can we possibly pay for the maintenance on a new fendered bus system?

Response: The financial plan includes a detailed projection of the operating and maintenance costs, and the sources of revenue for those costs.

2. I also have some questions about the real vision of the Department of Transportation, when we were first hearing about an expensive embedded-plate electromagnetic system to move the buses. In today's Advertiser, the last paragraph is a quote from Cheryl Soon that says that now a half a billion dollars will be spent on the current planned buses, and I believe these are wheeled type buses. But she goes on to say that a later consideration might be the embedded-plate electromagnetic bus system if the technology improves. Now, isn't this just a little wishy-washy? It says to me that you don't have a clear vision of where you're going, and you're willing to spend half a billion dollars in buses now and change your mind at a future date.

Response: This is not wishy-washy. It is sound implementation planning that uses state-of-the-art technology, but only after it has been thoroughly tested and is service proven in other cities. The plan is to start the system with environmentally friendly, hybrid-electric buses, and to convert to embedded plate, once it has been service proven. There is always the option of continuing with hybrid-electric even once embedded plate is proven. This decision will not have to be made until 2008.

3. I have recently consulted Traffic Engineers from Charlotte, N.C. and Chicago, Illinois in an effort to answer my questions regarding Bus Rapid Transit. Mr. William Finger, Traffic Engineer for Charlotte, N.C. told me that there are a number of successful Rapid bus systems, most notably Ottawa, Curitiba, Pittsburgh, Euclid, and Eugene. The key to success, according to Mr. Finger, is

Ms. Cheryl A. Stephenson

Page 2

November 13, 2002

dedicated bus lanes. "Riding the bus must be faster than driving". Mr. Tom Keeser, Traffic Engineer for Chicago, told me of a miserable failure in the early 80s where contraflow bus lanes were attempted on "one way" streets. Numerous accidents occurred both at intersections and mid-block, resulting in lawsuits against the city and at least one fatality. "The streets were well marked with warning signs and paint, but it didn't help. The contraflow bus lanes were subsequently removed".

Response: Comment noted. As stated in the MIS/DEIS, SDEIS, and FEIS, Chapter 2, the Primary Corridor Transportation Project includes exclusive, semi-exclusive, and shared travel lanes that give priority to buses. Only about seven percent (1.9 lane miles) of the In-Town BRT will be contra-flow, the remaining 23.7 lane miles will be normal flow.

Contra-flow bus lanes exist in many cities around the world. Examples of existing contra-flow bus lanes in the U.S. include the Lincoln Tunnel in New York, Sansome Street in San Francisco, Spring Street in downtown Los Angeles, most of the Lynton downtown circulator loop in Orlando, FL, and a section of Kuhio Avenue in Waikiki.

4. If, according to experts, riding a bus must be faster than driving in order to be called rapid, how can the Primary Corridor Transportation Project be called rapid? The buses in this plan do not travel faster than traffic.

Response: During the peak hours, the BRT vehicles will be traveling faster than autos in the general purpose lanes on H-1 since they will be in the zipper lane. Similarly, where the BRT vehicles will be in exclusive arterial lanes they will be traveling faster than autos wherever the autos are caught in congestion. This is because the BRT lanes will have unrestricted flow, whereas motorists will typically encounter traffic delays.

5. You have stated that bus riders will cut 3 min. from their commute time in certain areas on this system. I see this as a deliberate attempt to fool the public because a time savings of this nature can, and will be accomplished simply by skipping or removing stops. Buses will not be moving faster than cars, so please explain for me how this system will meet the rapid criteria?

Response: Many bus riders will have savings much greater than 3 minutes. Travel time savings will occur not only because there will be limited stops. Savings will occur from the priority lanes, and from features of the buses and the stops. These include level boarding from 3 doors at a time with pre-payment of fares. Signal priority at selected intersections will also help speed up the BRT travel times.

6. My investigation of contraflow bus lanes on "one way" streets has proven to me that such implementation would be an extreme safety hazard. Please cite specific examples of successful contraflow situations on "one way" streets. (Chicago found that by simply removing a few stops in the desired direction they were able to accomplish the same time savings. Again, we are not talking rapid, but rather a system of express buses.

Response: See response to comment #3.

7. I have been told by experts that \$1,000,000,000 is over the top for a bus system that does not meet the description of rapid. What would be your reasoning for deliberately deceiving the public, your City Council, the FTA, and the OAGC? Is your intent simply to "capture Federal money" as a recent BRT newspaper advertisement suggests. Is this a "get the money now, worry about the system later" scheme? I look forward to your comments.

Ms. Cheryl A. Stephenson  
Page 3  
November 13, 2002

May 5<sup>th</sup>, 2002

RECEIVED

TO: Ms. Cheryl Soon  
Director  
Department of Transportation Services  
City and County of Honolulu  
650 S. King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Copy: Ms. Donna Turchie FTA  
201 Mission Street Suite 2210  
San Francisco, California 94105-1839  
Copy: Genevieve Salmonson OEQC  
LIFEPOINT HOTEL  
1111 Ala Moana Blvd  
Honolulu, Hawaii 96813

Response: The roughly \$1 billion cost refers not only to the Regional and In-Town BRT. Approximately \$500 million of this will be for replacement of buses and Handi-Vans over the 23-year planning period of the project. This project is very cost effective when compared to any existing or planned BRT or light rail system.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Myamoto at 527-6976. We appreciate your interest in the project.

Ms. Soon:  
Re: Comments and Concerns (Primary Corridor Transportation Project)

PURPOSE AND NEED FOR ACTION

How do you enhance mobility and improved travel time and enhance the quality of life for Oahu residents by taking away lanes for exclusive and semi-exclusive bus use?  
How is this deemed an attractive alternative if it is not on its own "right of way" and causes traffic congestion or gridlock and at the same time increases that total congestion?

ALTERNATIVES CONSIDERED

Why was the TSM Alternative not considered as an improvement with the proposed hub and spoke system?  
Why wouldn't you provide improved service at the Eva end of the system first instead of in the Downtown/Waikiki corridor which gains only 3 minutes time (from 18.7 to 15.7 minutes) for 3.3% increase in ridership at a cost of Millions of dollars. Additionally it uses 12 of the existing transit stops and only adds 4 new ones. Where is this money being spent?

Contra Flow lanes are proposed on King and Pensacola, what other streets will have this type lane? Do you consider Contra Flow lanes to be safe? Have any cities in the mainland discontinued the use of these type of lanes because of fatalities to pedestrians?


ADDED COST TO THE PUBLIC

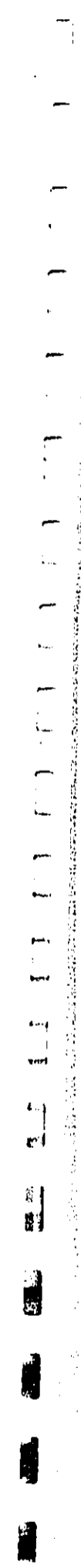
How can you say this will not cost the taxpayers any additional money when your Capital Cost Summary shows an increase of \$745,600,000 over the no build option?  
What about the Annual Operating and Maintenance Costs which are millions higher than the No Build Option? Isn't that additional taxpayer cost?

TRANSPORTATION IMPACTS

The plan mentions use of articulated buses. How long are they? How long are the Bi-articulated buses that are briefly mentioned?

How will the BRT offer fast efficient travel when it is on mostly semi-exclusive transit lanes. What happens when vehicles that make up 80% to 90% of the traffic on the roads needs to turn left or right and stop at lights? Do you account for their concerns of congestion and gridlock?

Sincerely,  
  
CHERYL D. SOON  
Director



THE NUMBERS DO NOT COMPUTE. ASSUME THE SMALLER NUMBER OF 80% OF THE VEHICLES ON THE ROAD GET REDUCED BY 3%, THAT STILL LEAVES 77% OF THEM ON THE ROAD. Tax paying citizens have spent \$1,000,062,500 for an improperly designed BUS SYSTEM not a mass transit system, WHY?

You show a loss of 912 parking spaces and 26 loading zones. How are businesses, residents and the PUBLIC in general compensated for the loss of commerce or convenience that they suffer? Is this not a form of DISPLACEMENT?

#### FTA COST-EFFECTIVENESS

You claim an average 11 percent increase in person carrying ability in the Urban Core. Don't you achieve this by carrying a significant number of tourists who do not have cars? Is this not a direct competition with private carriers? Is this why you are trying to do the Urban Core first to "pad the numbers" to try and justify the multi-million dollar expenditure to the FTA?

#### ASSUMPTIONS-THAT REQUIRE ANSWERS

How do you make an effective plan with all the FINANCIAL ASSUMPTIONS on Page 6-23? What are the consequences to the TAX PAYING PUBLIC if your assumptions are incorrect?

The Federal Transit money has been reduced by \$30,000,000 this year, the State has said they are not interested in funding the project (Brian Minali letter to Cheryl Soon dated September 18, 2001, "It is not our intent or expectation to provide funding for the BRT project; and have developed our capital improvements programs accordingly." How can the TAXPAYERS in the city afford this?

Public Transit systems survive primarily because of SUBSIDIES and not fares. How can you say there will be no increase in taxes when you go from 1181 transit jobs to 1760 or an increase of 49%? Won't that cause an increase in expenses that the PUBLIC pays for through taxes?

The reply "details of parking and loading zone mitigation would be coordinated at the neighborhood level during subsequent project planning". This is not mitigation of their loss but merely FINALLY informing them of your intentions to eliminate their parking. Why wasn't this done in advance so they could express their opinions? How are they compensated for the loss?

The financial plans were developed "based on the assumptions that the full scope of each alternate must be completed WITHOUT raising taxes, and that the City's high bond rating must not be affected." With the realization that you are in effect RAISING TAXES and the Mayor has over spent and the City is broke and the mandatory review later this year will no doubt lower the bond rating how is any BRT option viable?

You state the "City General Obligation (GO) bonds would be used to fund up to 47% of the cost of these alternatives. Additional GO bonds would be issued to fund early construction activities in anticipation of later federal or State reimbursement." How is this assumption ethical or possible since the State is written out of the process?

Where is the data that supports your statement? "A fully grade-separated transit system was considered and rejected because of high cost, physical and visual impacts, and community opposition."

"Duplication of routes is operationally not efficient and results in slower travel through the corridor." Isn't the proposed downtown/Waikiki branch at least a partial duplication of existing routes 8,19 and 207? How is this efficient?

Can you explain, on Ala Moana Blvd., if the Auto LOS is an "F" and the BRT runs on a shared lane rather than an exclusive lane how can the Transit LOS be improved to an "A"? The bus is part of the problem shouldn't the LOS should still be an F? (Table 4.2-7)

On Ala Moana Blvd., what is the benefit of narrowing and adding lanes to change the LOS F to LOS E at Hobron Lane? One block later three lanes, have to "bottleneck" down to two lanes at Kalia Road, what will that do to the LOS?

You state that Kuhio sidewalks should be widened. "This would remove one traffic lane in each direction." How can this not impact vehicles, tour busses, taxis and delivery vans with a 50% reduction in lanes?

Per Table 5.1-4 the total project is estimated to cost is estimated at \$1,062,500,000 in 1998 dollars. How do you justify that over half \$550,800,000 is being spent outside Hawaii for equipment?

#### CONCLUSION

Table 6.1-3C shows the In-Town BRT will cost \$345,509,000 from 2002 to 2010. How can you justify that amount of money for a few additional bus stops on already existing roadways for a 3.3% increase in ridership and a THREE minute improvement in time from Downtown to Waikiki?

WHY NOT JUST ADD A FEW NEW EXPRESS ROUTES TO AN ALREADY GREAT BUS SYSTEM AND SAVE THE FEDERAL MONEY FOR A TRUE MASS TRANSIT SYSTEM ON ITS OWN RIGHT OF WAY WITHOUT INCREASING CONGESTION ON OUR ALREADY CROWDED STREETS?

WHY DO YOU NEED TO PUT DOWN NEW CONCRETE WHEN THE EXISTING ASPHALT IS ADEQUATE EXCEPT AT THE BRT TRANSIT STOPS?

TEST THE SYSTEM WITHOUT PUTTING DOWN THE CONCRETE SO THE MONEY IS NOT WASTED WHEN THIS BECOMES OAHU'S NEXT "VAN CAM 2" AND YOU DISCONTINUE THE PROGRAM?



Dick Stephenson  
1777 Ala Moana Blvd. Box 2701-2001  
Honolulu, HI 96815  
cc: City Council Members

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE NEGROTTI  
COUNTY DIRECTOR

TPD502-01886R

November 13, 2002

Mr. Dick Stephenson  
1777 Ala Moana Boulevard, Box 2701-2001  
Honolulu, Hawaii 96815

Dear Mr. Stephenson:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, Public Hearing and your May 5, 2002 letter regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. *I have rewritten my testimony so many times sitting here, I don't know where to start. These minutes is very short. I am a bus rider, a satisfied, middle class bus rider, but I also need a car for various reasons that were stated here. There's many things you cannot take on the bus.*

Response: We concur that there are times when an automobile is required.

2. *I also support the mass transit plan. When I first heard about BRT and tried to find out something about it, this was the first booklet that I was able to get (indicating). Let me quote you from page two. It says it all. "A successful transportation plan will make it easier and more pleasant to drive, not more difficult." Have we heard anything about easier here today?*

Response: The refined LPA will result in a less congestion overall than the TSM or No-Build Alternatives.

3. *"Such a plan must expand our choice to become a win-win proposition for drivers, transit riders, pedestrians and bicyclists." Have you heard win-win here today?*

Response: Comment noted. No response required.

4. *This is what it's all about. This isn't staged. This is real people with real concerns now talking about a real plan, which has been a changing, moving target up till now. And yes, there's going to be more refinement before it moves forward.*

Response: Refinements are an integral part of the project development and implementation process for major projects such as this.

5. *Couple points that weren't brought up. 912 parking spaces are going to be eliminated in this plan in the urban core, 26 loading zones. If we don't need those, why aren't they gone already? We need those. There's nothing in the plan - and I see it back there, it's this thick - that mitigates the problem for the businesses where those parking spaces are being taken away.*

Mr. Dick Stephenson  
Page 2  
November 13, 2002

Response: DTS is aware that the proposed elimination of on-street parking spaces is of concern to many people. As discussed in Section 4.3, in areas where a large concentration of parking spaces would be affected, replacement parking in new off-street parking facilities will be considered, but only if they meet other livable community objectives and are the result of community-based planning.

6. *If Duke was here - I believe he's gone now. Duke? I don't see him. Okay. I would say this to him if he were here: "Duke, stop and take a deep breath and ask your five counterparts, who because of turmoil - that's six of you who will not be here in the next four to eight years, to back off."*

Response: Comment noted.

7. *Six months will not lose federal funding.*

Response: There is an annual cycle which the federal funding process follows.

8. *And let the new incoming City Council vote for a plan that they will have to live with for the next four, or if they're fortunate to rerun, eight years.*

Response: It was up to the present City Council to pick the LPA and to budget funds for moving the first segment of design and construction forward. It will be up to future City Councils to approve subsequent segments of the project.

9. *A-win, the name of this project is Bus Rapid Transit system. There's nothing rapid about it.*

Response: Comment noted.

10. *Another point that wasn't brought up strong enough. Of the billion plus dollars that this plan is going to cost, 550 million, over half, will be spent outside of Hawaii.*

Response: So much for jobs for people in Hawaii. That's jobs for people building buses on the mainland, or France, or Italy, or wherever we get them.

Response: The purchases outside of Hawaii are primarily for replacement of the bus fleet over a 23-year period which will be needed even with the TSM and No-Build Alternatives.

The BRT, plus TheBus and TheHandi-Van vehicles are manufactured outside of Hawaii. The BRT project will result in additional permanent bus drivers and administrative jobs plus over 4,000 person-year construction jobs. The MIS/DEIS, SDEIS, and FEIS Section 5.1.5 present the economic impacts/benefits related to the BRT project.

11. *Taxes will not go up. I think Cheryl Soon is correct in that. Taxes will not go up for four days. That's when she goes, on April 24, to Honolulu Hale and asks for \$35 million for this in-town portion of the plan. The plan, Bus Rapid Transit System, should be shortened to Bus System. And it can be shortened further to BS.*

Response: Comment noted.

12. *How do you enhance mobility and improved travel time and enhance the quality of life for Oahu residents by taking away lanes for exclusive and semi-exclusive bus use?*

**Response:** Chapter 4 of the FEIS fully discusses the consequences of converting selected general purpose lanes to priority use by transit vehicles.

When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

13. *How is this deemed an attractive alternative if it is not on its own "right of way" and causes traffic congestion or gridlock and at the same time increases the total congestion.*

**Response:** See response to comment # 12.

14. *Why was the TSM Alternative not considered as an improvement with the proposed hub and spoke system?*

**Response:** The TSM would be an improvement over the No-Build Alternative. It just isn't as effective an improvement compared to the Refined LPA.

15. *Why wouldn't you provide improved service at the Ewa end of the system first instead of in the Downtown/Waikiki corridor which gains only 3 minutes time (from 18.7 to 15.7 minutes) for 3.3% increase in ridership at a cost of millions of dollars. Additionally, it uses 12 of the existing transit stops and only adds 4 new ones. Where is this money being spent?*

**Response:** Timing and implementation of the P.M. zipper lane and related Regional BRT improvements must be coordinated with the State DOT. SDOT wants to widen the H-1 Freeway in the areas where the P.M. zipper lane is proposed before installing the zipper lane. Since the Waikiki segment of the In-Town BRT can be a viable improvement to the transit system immediately, the City Council has elected to proceed with this segment as the first step in phasing of the BRT system.

16. *Contra Flow lanes are proposed on King and Pensacola, what other streets will have this type lane? Do you consider Contra Flow lanes to be safe? Have any cities in the mainland discontinued the use of these type of lanes because of fatalities to pedestrians?*

**Response:** Contra-flow lanes will be installed on sections of S. King, Pensacola, Richards, and Kaimoku Streets. Contra-flow lanes are safe provided proper signing and other warning devices are in place.

17. *How can you say this will not cost the taxpayers any additional money when your Capital Cost Summary shows an increase of \$745,600,000 over the no build option?*

**Response:** The statement made is that there will be no increase in taxes needed to fund the project, not that it will not cost more than the No-Build Alternative.

18. *What about the Annual Operating and Maintenance Costs which are millions higher than the No Build Option? Isn't that additional taxpayer cost?*

**Response:** See response to comment # 17.

19. *The plan mentions used of articulated buses. How long are they? How long are the bi-articulated buses that are briefly mentioned?*

**Response:** The articulated buses will be 60-foot long. Bi-articulated buses are not proposed for use on this project. (They are 80-foot long).

20. *How will the BRT offer fast efficient travel when it is on mostly semi-exclusive transit lanes. What happens when vehicles that make up to 80% to 90% of the traffic on the roads need to turn left or right and stop at lights? Do you account for their concerns of congestion and gridlock?*

**Response:** It is not the conversion of lanes that will create the congestion. The congestion for motorists will be there without the BRT. When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

21. *THE NUMBERS DO NOT COMPUTE. ASSUME THE SMALLER NUMBER OF 80% OF THE VEHICLES ON THE ROAD GET REDUCED BY 3%, THAT STILL LEAVES 77% OF THEM ON THE ROAD. Tax paying citizens have spent \$1,000,0652,500 for an improperly designed BUS SYSTEM not a mass transit system. WFTY*

**Response:** Getting three percent of the autos off the road will make a difference.

22. *You show a loss of 912 parking spaces and 26 loading zones. How are businesses, residents and the PUBLIC in general compensated for the loss of commerce or convenience that they suffer? Is this not a form of DISPLACEMENT?*

**Response:** The Refined LPA's parking impacts would total roughly 533 unrestricted and restricted parking spaces, as reported in the FEIS. As discussed in Section 4.3, in areas where a large concentration of parking spaces would be affected, replacement parking in new off-street parking facilities would be considered, but only if they meet other livable community objectives and are the result of community-based planning. This is a policy decision to be addressed by the City. The on-street parking and loading impacts are not considered displacement, as defined by the federal government. For a discussion on displacements, see Section 5.2 of the FEIS.

23. *You claim an average 11 percent increase in person carrying ability in the Urban Core. Don't you achieve this by carrying a significant number of tourists who do not have cars? Is this not a direct competition with private carriers? Is this why you are trying to do the Urban Core first to "pad the numbers" to try and justify the multi-million dollar expenditure to the FTA?*

**Response:** The service the In-Town BRT will provide is geared to the needs of residents and workers in the urban core not to tourists, which is the market served by private carriers. The BRT will not take business away from tour bus and shuttle operators, since it will not pick-up tourists at their hotels and take them on various scenic tours. It will not take them to-and-from the Airport. It will not take them to-and-from their hotels and the Convention Center. It will not pick them up at the cruise ship terminal and carry them and their luggage directly to their hotels. And unlike the private shuttles it is not designed to operate in a loop that only goes between Waikiki hotels and the various tourist sites of interest. Some tourists may end up using BRT since it does serve some of the same destinations that the tourists want to go to. But the In-Town BRT goes to these places

because most of these are also major employment sites or sites where local residents go to as well. The number of tourists expected to use the public transit system with the Refined LPA is forecast to be no greater proportionally than today (i.e. around 10-15 percent of total daily boardings).

24. How do you make an effective plan with all the FINANCIAL ASSUMPTIONS on Page 6-23?  
What are the consequences to the TAX PAYING PUBLIC if your assumptions are incorrect?

**Response:** The Decision Factors in the last section of the financial plan narrative describe the major factors that may influence the financial plan. The financial plan was developed in a way to allow for the adjustment of the plan as conditions change. The ability of the plan to be flexible is demonstrated in changes made from the MISDEIS stage, to the SDEIS stage, to the FEIS. The basic conceptual model has been the same throughout, while allowing for changes in costs, and changes in revenue sources.

25. The Federal Transit money has been reduced by \$30,000,000 this year, the State has said they are not interested in funding the project (Brian Minsal letter to Cheryl Soon dated September 18, 2001, "it is not our intent or expectation to provide funding for the BRT project, and have developed our capital improvements programs accordingly." How can the TAXPAYERS in the city afford this?

**Response:** State highway funds are not included as a revenue source in the FEIS. The \$40 million dollars are paid for with a combination of FTA Section 5309 New Start grant funds and City GO Bond proceeds.

26. Public Transit systems survive primarily because of SUBSIDIES and not fares. How can you say there will be no increase in taxes when you go from 1181 transit jobs to 1760 or an increase of 49%? Won't that cause an increase in expenses that the PUBLIC pays for through taxes?

**Response:** In 2001, the City Council passed a policy that says that bus fares should recover no less than 27 percent of the cost, and no more than 33 percent. This reflects the City's policy position on the extent of public support for public transportation. Operations and maintenance (O&M) costs will be higher for a system that has more capacity and carries more passengers. If the fares are kept at 27 percent of operating costs, then the BRT O&M costs will be an average of \$16.1 million more than the No Build O&M costs, and \$10.8 million more than the TSM alternative. The City has the financial capacity for this increase using existing sources of revenue.

27. The reply details of parking and loading zone mitigation would be coordinated at the neighborhood level during subsequent project planning. This is not mitigation of their loss but merely FINALLY informing them of your intentions to eliminate their parking. Why wasn't this done in advance so they could express their opinions? How are they compensated for the loss?

**Response:** Parking impacts were disclosed in the MISDEIS, and we have tried to be as responsive in addressing community concerns about loss of parking. However, elimination of parking is an unavoidable adverse impact, and the mitigation proposed is to consider replacement parking in new off-street parking facilities in areas of concentrated parking impacts, but only if such replacement parking were to meet other livable community objectives and are the result of community-based planning. This is a policy decision to be addressed by the City.

28. The financial plans were developed based on the assumptions that the full scope of each alternate must be completed WITHOUT raising taxes, and that the City's high bond rating must not be affected. With the realization that you are in effect RAISING TAXES and the Mayor has over spent and the City is broke and the mandatory review later this year will no doubt lower the bond rating how is any BRT option viable?

**Response:** In preparing the FEIS, the level of GO bonds per year was established within the City's Debt and Financial Policies as passed by the City Council in April, 2002, leaving capacity for other major capital projects.

29. You state the "City General Obligation (GO) bonds would be used to fund up to 47% of the cost of these alternatives. Additional GO bonds would be issued to fund early construction activities in anticipation of later federal or State reimbursement." How is this assumption ethical or possible since the State is written out of the process?

**Response:** Not removing the State as a reimbursement source was an inadvertent clerical error. This is corrected in the FEIS.

30. Where is the data that supports your statement? "A fully grade-separated transit system was considered and rejected because of high cost, physical and visual impacts, and community opposition."

**Response:** The 1990 Rapid Transit Project reflects a very detailed plan, including costs and impacts for an elevated rail system. Based on what was known from that project, at the outset of the PCIP, the community at public meetings, and the City Council rejected a grade-separated transit system as too costly and unsightly.

31. "Duplication of routes is operationally not efficient and results in slower travel through the corridor." Isn't the proposed downtown/Waikiki branch at least a partial duplication of existing routes 8, 19 and 20? How is this efficient?

**Response:** As part of the Primary Corridor Transportation Project, future transit operations were evaluated with assumed modifications to the transit system. Transit route modifications assumed for the FEIS analysis include the following: Route 8 would be replaced by the BRT and Routes 19 and 20 would be maintained to provide local bus service between Hickam AFB and Waikiki. Routes 19 and 20 are local buses, which stop more frequently than the limited stop BRT would. By stopping at only selected transit stops, the BRT will be able to travel faster, providing better travel times to transit riders. This is similar to the way Route A CityExpress and Route 3 - Ruler both operate on Kapiolani Boulevard, the former a limited stop route and the latter and local route.

32. Can you explain, on Ala Moana Blvd., if the Auto LOS is an "F" and the BRT runs on a shared lane rather than an exclusive lane how can the Transit LOS be improved to an "A"? The bus is part of the problem shouldn't the LOS should still be an "F"? (Table 4.2-7)

**Response:** The auto LOS is an overall index of intersection operation which is comprised of a weighted average of all intersection approaches. The transit LOS is comprised only of the BRT movements at the intersection. The Ala Moana Boulevard Intersections listed in Table 4.2-7 are within a portion of the BRT route that includes semi-exclusive transit lanes. These semi-exclusive

lanes would only allow BRT, City bus, tour bus, and vehicles turning right into cross streets. The reduced level of demand and the assumed transit priority at traffic signals for this lane will allow it to operate at a better LOS than other lanes and approaches.

33. On Ala Moana Blvd., what is the benefit of narrowing and adding lanes to change the LOS F to LOS E at Hobron Lane? One block later, three lanes, have to "bottleneck" down to two lanes at Kalia Road, what will that do to the LOS?

Response: The Refined LPA documented in the FEIS includes modifications to the cross-section of Ala Moana Boulevard between Alkinson Drive and Kalia Road. This includes the addition of semi-exclusive lanes for use by BRT vehicles, City buses, tour buses, and vehicles turning right into cross streets. This segment of Ala Moana Boulevard is already experiencing significant traffic congestion and reallocation of one lane in each direction from general-purpose to semi-exclusive use would have greatly worsened the situation. Because this area included an existing wide median, new lanes are proposed between Hobron Lane and Kalia Road by narrowing the median and reducing the width of the travel lanes. The three Koko Head bound through lanes will be continued through the Kalia Road intersection before being merged back to two lanes.

34. You state that Kuhio sidewalks should be widened. This would remove one traffic lane in each direction. How can this not impact vehicles, tour buses, taxis and delivery vans with a 50% reduction in lanes?

Response: Widening of the sidewalks along Kuhio Avenue is being proposed as part of the Livable Waikiki project. It is incorporated in all of the alternatives that were looked at in the PCTP.

35. Per Table 5.1-4 the total project is estimated to cost \$1,362,500,000 in 1998 dollars. How do you justify that over half \$550,800,000 is being spent outside Hawaii for equipment?

Response: The purchases outside of Hawaii are primarily for replacement of the bus fleet over a 23-year period which will be needed even with the TSM and No-Build Alternatives.

36. Table 6.1-3C shows the In-Town BRT will cost \$345,509,000 from 2002 to 2010. How can you justify that amount of money for a few additional bus stops on already existing roadways for a 3.3% increase in ridership and a THREE minute improvement in time from Downtown to Waikiki?

Response: The costs for the In-Town BRT include a lot more than a few additional bus stops. It includes paving the BRT lanes with concrete, installing embedded-plate modules and traction power system, installing more advanced traffic signal elements, improving sidewalks to make it easier to get to the stops, and installing waiting platforms with canopies, benches, lighting and landscaping.

37. WHY NOT JUST ADD A FEW NEW EXPRESS ROUTES TO AN ALREADY GREAT BUS SYSTEM AND SAVE THE FEDERAL MONEY FOR A TRUE MASS TRANSIT SYSTEM ON ITS OWN RIGHT OF WAY WITHOUT INCREASING CONGESTION ON OUR ALREADY CROWDED STREETS?

Response: Express routes on their own would not offer the same benefits of a BRT system that has many other features to speed it along including zipper lanes, special freeway ramps, priority lanes in-town, level boarding from 3 doors, and signal priority at selected intersections.

38. WHY DO YOU NEED TO PUT DOWN NEW CONCRETE WHEN THE EXISTING ASPHALT IS ADEQUATE EXCEPT AT THE BRT TRANSIT STOPS?

Response: The existing asphalt concrete pavements in most locations will not be able to sustain heavy repetitive loads from BRT vehicles. Concrete lanes will extend the life of the pavement and reduce the road maintenance over the life of the project.

Pavement damage can be observed on many City and County Streets where TheBus routes its vehicles on asphalt concrete pavements. This is readily observed on Dillingham Boulevard where the curbside lanes have severe rutting and damage due to TheBus traffic. The City has several projects to place concrete lanes at locations with heavy repetitive bus traffic loads. Recent examples of projects that have been completed or are planned are on King Street and Keplolani Boulevard.

39. TEST THE SYSTEM WITHOUT PUTTING DOWN THE CONCRETE SO THE MONEY IS NOT WASTED WHEN THIS BECOMES OAHU'S NEXT "VAN CAM 2" AND YOU DISCONTINUE THE PROGRAM?

Response: A test of closing a lane is not a test of what will happen with the BRT, it is only a test of what happens when a lane is closed which is something everyone knows from when lanes are temporarily closed during utility construction.

As is pointed out in Chapter 4 of the FEIS, over time there will be more than enough people diverted from autos to transit to offset the impact of converting lanes for priority use by buses. This diversion from autos will only happen once it is clear that the BRT installation is a permanent improvement, not part of some test.

What is proposed with the first branch between Iwilei and Waikiki will be a good test of the ability of BRT to attract new riders and the impacts of converting lanes in selected locations.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director



**Testimony in Support of Bus Rapid Transit**

My name is Georgette Stevens-Begley and I have been a resident of Makakilo for the past 12 years and I grew up in Wai'anae. Although I work in Kapolei, when I was younger I used to take the bus from Wai'anae to Honolulu and Waipahu to get to college and know that the Bus Rapid Transit (BRT) would have been beneficial back then and will be beneficial now. I support BRT because:

1. The users would get to their workplace much quicker than if they drove their cars during peak-time.
2. The users would save a lot of money on their car maintenance, fuel bill, and in some cases insurance because their risk exposure would decrease significantly. Some of my family members travel from Makaha to Honolulu and that is a daily round trip of 80 miles.
3. Since there would be a lane dedicated for BRT, there would be less roadways for others to drive on and it will encourage others to use BRT.

Since I can remember, traffic has always been a problem and continues to get worse. Our City and State have examined various forms of transportation systems, such as the mass rail system, and have come to no conclusion, with the exception of the zipper lane. With the BRT in place, it will not be too costly to implement, it will be beneficial to most of the daily commuters into Honolulu, and it will also decrease the amount of use-to-be-nice-guys who turned into road-rage-monsters.

Mahalo.

Georgette Stevens-Begley  
92-1149 Makamui Loop  
Makakilo, HI 96707  
672-3345 (day) 672-9796 (night)

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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE 'KEONI' MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD02-00633

Ms. Georgette Stevens-Begley  
92-1149 Makamui Loop  
Makakilo, Hawaii 96707

Dear Ms. Stevens-Begley:

Subject: Primary Corridor Transportation Project

This is in response to your September 25, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. *Although I work in Kapolei, when I was younger I used to take the bus from Wai'anae to Honolulu and Waipahu to get to college and know that the Bus Rapid Transit (BRT) would have been beneficial back then and will be beneficial now. I support BRT.*

Response: Comment noted. Thank you for supporting the project.

2. *The users would get to their workplace much quicker than if they drove their cars during peak-time.*

Response: Comment noted. The analysis concurs with this statement.

3. *The users would save a lot of money on their car maintenance, fuel bill, and in some cases insurance because their risk exposure would decrease significantly.*

Response: Comment noted.

4. *Since there would be a lane dedicated for BRT, there would be less roadways for others to drive on and it will encourage others to use BRT.*

Response: Comment noted.

Ms. Georgette Stevens-Begley  
Page 2  
November 13, 2002

5. *Our City and State have examined various forms of transportation systems, such as the mass rail system, and have come to no conclusion, with the exception of the zipper lane. With the BRT in place, it will not be too costly to implement, it will be beneficial to most of the daily commuters into Honolulu, and it will also decrease the amount of use-to-be-nice-guys who turned into road-range monsters.*

Response: Comment noted.

We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

JANE SUGIMURA  
98-500 Koanuka Loop #20F  
Aiea, Hawaii 96701  
Email: [ysugim@msn.com](mailto:ysugim@msn.com)

November 14, 2000

Via Telefax 527-5733

Duke Bainum, Chair  
Transportation Committee  
Council, City and County of Honolulu  
Honolulu, Hawaii 96813

Re: Testimony in Support of Resolution 00-249 Relating to  
the Selection of a Locally Preferred Alternative for  
the Primary Corridor Transportation Project  
Hearing: Tuesday, November 14, 2000, 10:00 a.m.

Dear Chair Bainum and Members of the Committee:

I am a resident of Aiea and a member of the Aiea Neighborhood Board #20. I am testifying today in my individual capacity.

Like my neighbors, I am grateful to the Chairman Bainum and our Councilmember Gary Okino for having the public meetings in the community about the proposed new transportation system. Traffic and congestion are big concerns in my neighborhood as they are in many other communities. Because I believe this proposal will alleviate some of those problems in my community, I support this resolution.

With respect to specific items that may be part of the transportation plan as it affects Aiea, I suggest the following that were raised at a community meeting held on October 8, 2000:

1. Eliminate the Kam Drive-In Site as a Transit Center. The community is unanimous on this point. No one wants a transit center at this site because it is already congested and because of noise and health concerns.
2. Designate Kam Highway as a High-Speed Transportation Corridor. I support the proposal made by Councilmember

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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE KEONI MIYAMOTO  
DEPUTY DIRECTOR

Gary Okino at the November 8<sup>th</sup> public meeting, which would designate Kam Highway as a high-speed corridor for the transit system with a dedicated lane for buses. The extra lane can be constructed by using the median strip and this will not result in the time, expense and inconvenience to businesses and drivers that would result from widening the existing road.

3. Transit Centers. Construct transit centers at the former Siemens Volvo site and the stadium parking lot adjacent to K-Mart for our area. The Siemens site is already the stop for 8 existing bus routes and it is close to main retail center for the area, i.e., Pearlridge Center, Westridge Shopping Center and Pearl Kai Center. The property is adjacent to the bike path and the Pearl Harbor Historic Trail and would give bikers and present and future users of the trail access to bus system.

Finally the cost of Councilman Okino's proposal will be less than the proposal in the draft EIS which calls for ramps to be constructed from the freeway to Kaonohi Street and construction of a transit center at the Kam Drive-in site.

I am in support of this resolution if Councilmember Okino's proposal is incorporated.

Thank you for allowing me to testify on this bill.

  
Jane Sugimura

November 13, 2002

TPD02-00634

Ms. Jane Sugimura  
98-500 Koaika Loop, #20F  
Aiea, Hawaii 96701

Dear Ms. Sugimura:

Subject: Primary Corridor Transportation Project

This is in response to your October 19, 2000 testimony at the Special Transportation Committee Meeting, your November 14, 2000 fax, and your oral testimony at the November 14, 2000 Special Transportation Committee Meeting regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. As a member of the Neighborhood Board, we did have a meeting last week Monday and because of the concerns raised by the community, the Aiea Neighborhood Board did unanimously adopt the resolution which you will be getting opposing the Kam Drive-In site as a transportation center for the reasons here tonight and at our meeting.

Response: The former Kamehameha Drive-in site is no longer being considered for a transit center.

2. I am concerned about the fact that I think in response to Gary's earlier question about consideration of the Kam Highway corridor. I hope that doesn't preclude the fact that maybe the transportation center could be down there because I think, you know, most of the people who live in the community or what I've heard do not want it at the Kam Drive-in site for all of the reasons that you know, people have testified about. If there is some way we could find other site for the transportation center, maybe, you know, we can find that out during the task force. That's what we would be looking to do and I as an individual look forward to working with all of you to try to resolve it.

Response: The former Kamehameha Drive-In site is no longer being considered for a transit center.

3. Like my neighbors, I am grateful to the Chairman Bainum and our Councilmember Gary Okino for having the public meetings in the community about the proposed new transportation system. Traffic and congestion are big concerns in my neighborhood as they are in many other communities. Because I believe this proposal will alleviate some of those problems in my community, I support this resolution.

Response: Comment Noted. Thank you for supporting the project.

4. Eliminate the Kam Drive-In Site as a Transit Center. The community is unanimous on this point. No one wants a transit center at this site because it is already congested and because of noise and health concerns.

DEPARTMENT OF TRANSPORTATION SERVICES  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE REEDO MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00635

November 13, 2002

Ms. Jane Sugimura  
Page 2  
November 13, 2002

- Response:** The former Kamehameha Drive-in site is no longer being considered for a transit center.
5. **Designate Kam Highway as a High-Speed Transportation Corridor.** I support the proposal made by Councilmember Gary Okino at the November 8<sup>th</sup> public meeting, which would designate Kam Highway as a high-speed corridor for the transit system with a dedicated lane for buses. The extra lane can be constructed by using the median strip and this will not result in the time, expense and inconvenience to businesses and drivers that would result from widening the existing road.
- Response:** The Pearl City/Alea Working Group recommended a peak period contra-flow lane for buses on Kamehameha Highway. A planning study of the contra-flow lane is included in the FY 2003 CIP.
6. **Construct transit centers at the former Siemens Vokso site and the stadium parking lot adjacent to K-Mart for our area.** The Siemens site is already the stop for 9 existing bus routes and it is close to main retail center for the area, i.e., Pearridge Center, Westridge Shopping Center and Pearl Kai Center. The property is adjacent to the bike path and the Pearl Harbor Historic Trail and would give bikers and present and future users of the Trail access to bus system.
- Response:** The Pearl City/Alea Working Group recommended the former Jim Siemens auto dealership as a transit center site due to its proximity to Kamehameha Highway and Pearridge Shopping Center. DTS is proceeding with this transit center independent of the PCTP. The working group also evaluated several locations for a transit center/park-and-ride facility at Aloha Stadium. The overflow (Kamehameha Highway) parking lot site was selected.
7. **Finally the cost of Councilman Okino's proposal will be less than the proposal in the draft EIS which calls for ramps to be constructed from the freeway to Koonohi Street and construction of a transit center at the Kam Drive-in site.**
- Response:** The concept proposed by Councilman Okino is what is included in the Refined LPA. Some of the elements however are proceeding as separate projects.
8. **I am in support of this resolution if Councilmember Okino's proposal is incorporated.**
- Response:** Based on input received from the members of the Pearl City/Alea Working Group including Councilmember Okino, Kamehameha Highway will be established as the main transit spine within Pearl City/Alea with contraflow exclusive bus lanes operating during the a.m. and p.m. peak periods. This is proceeding as an independent project.
- We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-5978. We appreciate your interest in the project.

Mr. Charles O. Swanson  
3038 Oahu Avenue  
Honolulu, Hawaii 96822

Dear Mr. Swanson:

Subject: Primary Corridor Transportation Project

This is in response to the comment you made on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS). At the November 14, 2000 Transportation Committee meeting you supported the Bus Rapid Transit alternative. Thank you for supporting the project.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

Sincerely,

CHERYL D. SOON  
Director

April 19, 2002

APR 20 2002

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE "KEOKI" MIYAJI  
DEPUTY DIRECTOR

TPD02-00636

November 13, 2002

Dear Sir or Madam:

Aloha!


I have been taking the bus for the past 8 years, and I've rode it everywhere on the island. I take the bus to and from work and school. Recent improvements on the bus system such as the Bike racks, City Express as well as the new hub system have made my commute a little more convenient.

This time, I would like you to support the Bus Rapid Transit system to further improve the commute of everyone on the island. There are several reasons for doing so:

- Honolulu needs a high-capacity, fast people-mover, especially during rush-hour. Commute time has gotten longer and longer and there is no signs of improvement.
- A rapid-transit system would "connect" Honolulu with West and Central Oahu in a way that business can be conducted without having to worry about traffic and parking: Imagine a system that shuttles university students between UH Manoa and UH Community Colleges.
- Revitalize our construction industry and give jobs.
- The new system will open up more jobs for bus operators, supervisors, and maintenance workers.

I hope that you would support this system.

Best regards,

  
 Allan Tagayuna  
 2950 Ala Ilima St., Honolulu

Mr. Allan Tagayuna  
 2950 Ala Ilima Street  
 Honolulu, Hawaii 96818

Dear Mr. Tagayuna:

Subject: Primary Corridor Transportation Project

This is in response to your April 19, 2002 letter regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. *I have been taking the bus for the past 8 years, and I've rode it everywhere on the island. I take the bus to and from work and school. Recent improvements on the bus system such as the Bike racks, City Express as well as the new hub system have made my commute a little more convenient.*

Response: Thank you for your compliments regarding the current bus system. We appreciate your patronage.

2. *This time, I would like you to support the Bus Rapid Transit system to further improve the commute of everyone on the island. There are several reasons for doing so.*

- (A) *Honolulu needs a high-capacity, fast people-mover, especially during rush-hour. Commute time has gotten longer and longer and there is no signs of improvement.*
- (B) *A rapid-transit system would "connect" Honolulu with West and Central Oahu in a way that business can be conducted without having to worry about traffic and parking: Imagine a system that shuttles university students between UH Manoa and UH Community Colleges.*
- (C) *Revitalize our construction industry and give jobs.*

Mr. Allan Tagayuna  
Page 2  
November 13, 2002

(D) *The new system will open up more jobs for bus operators, supervisors, and maintenance workers.*

*Response: We concur with your observations and appreciate you supporting the project.*

We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE "RED" MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00637

November 13, 2002

Mr. Henry Takahashi  
98-943 Moanalua Road  
Apt. 1702  
Aiea, Hawaii 96701

Dear Mr. Takahashi:

Subject: Primary Corridor Transportation Project

This is in response to your October 19, 2000 oral testimony at the Special Transportation Committee meeting regarding the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. *I oppose the project you guys are thinking of because of what are the hours it's going to be operating. I get up at three o'clock in the morning, go to work and I get home at five o'clock certain days. And when I coming on the street coming up by Kam Drive-In at three o'clock, only 15 cars can make a left-turn onto Moanalua Highway.*

**Response:** If your concern is the hours of operation of the system as a result of its location at Kamehameha Drive-In, the transit center site at Kamehameha Drive-In and the on/off-ramp from Keonohi Street to H-1 have been eliminated from consideration.

2. *And how are you guys going to get the bus from Kam Highway up to Kam Drive-In when it's illegal to make a left turn. Since Kam Drive-In has been open, it was never allowed to make a left turn. So when you guys are going to make the hub, are you guys going to make it legal to make a left-turn now?*

**Response:** The former Kamehameha Drive-In site is no longer being considered for a transit center.

3. *Have you guys ever thought about looking at Sears warehouse? Because you guys got all the right to condemn the land. There's an off ramp close by and it's easier to build another ramp going to Ewa off that highway.*

**Response:** The Sears warehouse property was evaluated as a potential transit center site but was eliminated from consideration because it would require a major business displacement. Also, a BRT H-1 ramp was considered near that location, but eliminated from consideration due its high cost and substantial residential displacements.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE YEKI • MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00638

November 13, 2002

Mr. Clifton Takamura  
2249 Dale Street, Apt. 3  
Honolulu, Hawaii 96826

Dear Mr. Takamura:

Subject: Primary Corridor Transportation Project

This responds to the comments you made on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your testimony at the October 26, 2000 Special Transportation Committee Meeting regarding the MIS/DEIS. Part B responds to your oral testimony at the SDEIS April 20, 2002 Public Hearing.

Part A - MIS/DEIS Comments

1. And I personally feel that if we had the light-rail system that was originally planned many years ago, the current problems that we're having right now with so many cars on the street, industrial vehicles that also have to use the same road and causing trouble for pedestrians and other forms of traffic would have been relieved and would have never shown up to be so bad in this half of our twentieth century and be an issue in this beginning of this millennium.

Response: Comment noted.

2. And I look forward to the BRT. Being a bus rider for many years, I am a great fan of the bus system. But also I feel too by my neighborhood board as well as my visioning team is that we want to see the bus route improved basically with this train-or-wheels and the BRT.

Response: Comment noted. Thank you for supporting the project.

Part B - SDEIS Comments

3. I'm a resident of McCully-Moiliili. I'm also a member of the McCully-Moiliili Neighborhood Board and chairman of their Legislative Affairs Committee. I had an opportunity this morning to hear a lot of people talk about the problem of BRT and the master plan, that is, environmental - the environmental statement has to offer.

Response: Thank you for attending the public hearing.

4. I'm a bus rider ever since being a little boy, born here in the island of Oahu. And I currently am a bus rider, and I pay for with - sometime with my own - buy the bus pass to use our bus system. And, also, I'm a regular driver as well. I've seen the problem about our cars, our problem with our

Mr. Clifton Takamura  
Page 2  
November 13, 2002

cars and our traffic. I only want to say that we have been so far talking about traffic congestion, when we should be talking about how could we solve this problem by defining it as a traffic decongestion.

Response: We appreciate you sharing your bus riding and Oahu's traffic congestion history.

5. You know, we live on this island that is very unique, where it's mixed up with a lot of local people, families, both using cars, other forms of transportation to ourselves. But we do have a very good public transit system.

Response: Thank you for complementing the current bus system.

6. The only thing I've been concerned of is the people that - from Waikiki that say that this rapid transit system is another problem.

Response: Comment noted. No response required.

7. I want to see the new EIS to maybe turn this - to drop the - their condition putting it into Waikiki and maybe turning it into a hub-and-spoke area, and then moving this BRT from the county side of our island to the University system itself, that which keeps it on the other side of the Ala Wai so that it would relieve the concern of the people of Waikiki. This is my suggestion based on the new EIS.

Response: Waikiki is one of the densest residential and employment sites on the island. Connecting it to other parts of the island by the In-Town BRT will help reduce the number of autos and buses circulating in Waikiki.

8. And I hope that the people of this DTS will consider my suggestion. And I will be putting in my additional comments in a written testimony, and I'll send it to you people.

Response: We appreciate you expressing your views regarding the Waikiki portion of the project.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Felth Miyamoto at 527-6876. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

RECEIVED

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DIRECTOR'S OFFICE  
DEPARTMENT OF TRANSPORTATION SERVICES

Comment on Honolulu BRT Project  
Honolulu Department of Transportation Services  
ATTN: Director Cheryl D. Soon  
May 6, 2002

Toshi Takata  
469 Ena Road, Apt. 3303  
Honolulu, Hawaii 96815  
Tel: 528-7039

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU  
650 SOUTH KING STREET, 3RD FLOOR  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE KEDDO \* MIYAMOTO  
DEPUTY DIRECTOR

TPD5/02-01888R

November 13, 2002

RE: Comment in Full Support of BRT Primary Corridor Project

The traffic congestion caused by far too many private auto commuters in Honolulu is progressively getting worse and the BRT project is the ONLY solution being seriously considered. The project plan has been formulated through a thorough, carefully thought out process and offers real hope in effectively addressing our traffic/commute problems. The current outcries against the system seem largely from the uninformed, narrow-minded status quo motorists who see the project as a threat to their exclusive use of the road.

A key assumption critics make is that commuters will not get out of their autos to use the BRT. This assumption is based on how the buses currently run, and may be valid if that were true. However, the BRT will have more frequent regular buses running in exclusive project lanes allowing travel to be as fast as private autos, even faster during times of peak congestion. Including the time additionally saved by not needing to park a car, a commuter could net considerable savings in time, effort, money, resources, etc. (!) in the daily commute compared to using their autos. And, imagine how many more would consider taking the BRT after seeing commuters "fly" by in the buses while they are stuck in traffic.

As more commuters use the BRT the overall traffic situation will improve as overall auto traffic decreases. Thereby, in the bigger picture we all benefit. The bottom line is that there is not a single more effective and positive way to improve the overall quality of life here for all while enhancing the value of our number one industry (tourism) than to significantly reduce auto use and correspondingly encourage alternatives such as walking, bicycling, and mass transit as envisioned in the BRT project.

The BRT project is a fine way for City & County to demonstrate some real and badly needed leadership on this matter. It is very likely that our children will be grateful that the right direction was taken before auto gridlock was reached.

cc - G. Salmonson @ Office of Environmental Quality Control.

Mr. Toshi Takata  
469 Ena Road, Apt. 3303  
Honolulu, Hawaii 96815

Dear Mr. Takata:

Subject: Primary Corridor Transportation Project

This is in response to your comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. The traffic congestion caused by far too many private auto commuters in Honolulu is progressively getting worse and the BRT project is the ONLY solution being seriously considered. The project plan has been formulated through a thorough, carefully thought out process and offers real hope in effectively addressing our traffic/commute problems. The current outcries against the system seem largely from the uninformed, narrow-minded status quo motorists who see the project as a threat to their exclusive use of the road.

Response: We appreciate your support of the BRT project.

2. A key assumption critics make is that commuters will not get out of their autos to use the BRT. This assumption is based on how the buses currently run, and may be valid if that were true. However, the BRT will have more frequent regular buses running in exclusive project lanes allowing travel to be as fast as private autos, even faster during times of peak congestion. Including the time additionally saved by not needing to park a car, a commuter could net considerable savings in time, effort, money, resources, etc. (!) in the daily commute compared to using their autos. And, imagine how many more would consider taking the BRT after seeing commuters "fly" by in the buses while they are stuck in traffic.

Response: These are all valid points.





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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE 'KEONO' MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD02-00638

Mr. Lee Takushi

Dear Mr. Takushi:

Subject: Primary Corridor Transportation Project

This is in response to your April 20, 2002 comment regarding the Supplemental Draft Environmental Impact Statement (SDEIS).

*I recently returned from a trip to Japan and I have also been to San Francisco several times. I am really amazed at their transit systems and hope that, one day, Honolulu will also have a system that we can be proud of.*

*I fully support the proposed Bus Rapid Transit program. It is the start of a "dream come true."*

Thank you for supporting the BRT project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
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CHERYL D. SOON  
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DEPUTY DIRECTOR

November 13, 2002

TPD02-00640

Ms. Claire Tamamoto  
99-21 Hailimanu Place  
Aiea, Hawaii 96701

Dear Ms. Tamamoto:

Subject: Primary Corridor Transportation Project

This responds to the comments you made on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS) and Supplemental Draft Environmental Impact Statement (SDEIS). We are responding in two parts. Part A responds to your November 14, 2000 oral testimony at the November 14, 2000 Transportation Committee meeting regarding the MIS/DEIS. Part B responds to the comments you made at the SDEIS April 20, 2002 Public Hearing.

Part A – MIS/DEIS Comment

1. Testimony supported the PCTP.

Response: Thank you for supporting the project.

Part B – SDEIS Comments

2. Last year, City Council passed legislation moving our city towards a much needed transportation plan. Transportation is a vital component to our community's planning and also a universal concern for residents, businesses and visitors alike.

Response: We concur and appreciate you attending the public hearing an expressing your views regarding the BRT project.

3. I would like to speak in favor of the SDEIS as released. The Supplemental Draft Environmental Impact Statement accurately reflecting a seven-month process I participated in my communities, Aiea and Pearl City. The Department of Transportation Services and the consultant should be recognized for their efforts to hear and assess the needs and concerns and also the working feasibility of the projects that were coordinated – incorporated in the Primary Corridor Transportation Project.

Response: Thank you.

4. *Our community, in particular, is very concerned about the proposed off-ramp and the location of the transit center at the Kamehameha Drive-in site. Through the Department of Transportation Services sponsored Working Groups, we were able to discuss those concerns, look at alternatives and the traffic flow through our communities, and agree on a workable solution that serves the communities, while still addressing the needs of the overall BRT program.*

Response: As a result of the comments received on the DEIS and the working group meetings, the Kamehameha Drive-in site was dropped from further consideration. The working groups resulted in several project changes which were addressed in the SDEIS.

5. *The SDEIS replaces the Kaonoiki Street and the Radford Drive ramps with the Luapele Drive ramp. The Alea/Pearl City committee supported the deletion of the Kamehameha Drive-in site and the transportation center at the Kaonoiki Street - with the Kaonoiki Street on- and off-ramps.*

Response: We appreciate your participation in the Pearl City/Alea Working Group.

6. *We also supported the continued planning of two transit centers along the Kamehameha Highway - along Kamehameha Highway to be linked with the Aloha Stadium Transit center. The community businesses and DEIS discussed and supported the recommendations for shared buses and HOV contraflow lanes along Kamehameha Highway during peak traffic hours. The committee felt the selection of the proposed transportation center at the beginning of Kamehameha Highway town-bound, another midway through the Pearlridge area, complemented the proposed transportation center at Aloha Stadium. The proposed peak traffic and contraflow dedicated bus lanes would address the needs of our communities by enhancing inter-community transportation.*

Response: These projects are being developed as separate projects.

7. *I feel it is important to protect the integrity of the community process that has been conducted over the past year. I know our communities were given ample opportunity to bring our concerns. That process, I would have hoped, would have been given to the other communities affected by the Draft EIS. The process, with the commitment made by those communities and the City to fashion a plan, a working document, I'm sure that could be modified by the time they're done with the implementation of BRT. I am proud of this sort of capacity building between government agencies and the communities that is essential if we are to move forward on any type of plan.*

Response: There were five working groups that met between the time the DEIS was released and before the SDEIS was released for review and comment. The working groups suggestions and input resulted in the project changes the SDEIS addresses. A sixth working group was formulated in the Salt Lake area between the SDEIS and the FEIS being released.

8. *I'm going to go slightly off here. Because I'm a little confused at the purpose of this hearing. I thought that we were here to discuss comments on the SDEIS. I was encouraged to see so many people come out to testify, and I would like to encourage these people to continue with the process. It is important that you have come to share*

*your thoughts. But it is also important that you hear the thoughts and the concerns of the other voters that have been involved in this process for over a year. I think it's only fair to them that you also work with them.*

Response: You are right, the purpose of the April 20, 2002 public hearing was to hear comments on the BRT project, including the information presented in the MIS/DEIS and SDEIS.

9. *I know I'm supposed to summarize. So a little more. Because, you know, we talked about cost, additional cost. Cost is going to be there no matter what. I don't think you can get away from it. I think it makes sense to leverage what cost we have against federal monies to decrease the amount of hit that we, the taxpayers, take here.*

Response: Comment noted.

10. *I think, on the outlying areas, one of the big things that you have to realize is we have a zipper lane. The zipper lane gridlocks in town. You need to solve the in-town problem first, or else we go nowhere.*

Response: Comment noted.

11. *I just encourage you to continue to go forward, implement something, because we've been waiting for over 20 years.*

Response: Thank you.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

Rose Kahn

Dillingham Bus Lanes  
10-27-00

As a concerned businessman and fellow commuter, I feel that we should look at an alternative to the current plan of running the buses down the center of Dillingham. I have listed some of the reasons that I feel that this plan will not be effective and why it should be revised.

- 1) The current design calls for the removal of three lanes on Dillingham to make way for two bus lanes. The buses will stop for passengers about every quarter mile. Many of us feel that a quarter mile is too far for many bus riders. Since the buses have to stop at each traffic light and bus stop, this will not accomplish your needs of quicker travel time for the bus.
- 2) The removal of over fifty percent of the lanes on Dillingham and leaving only one town bound and one Ewa bound lane will cause major traffic congestion for King Street and Nimitz Highway. Should a traffic problem or construction work be needed on King Street or Nimitz Highway, Dillingham will not be able to handle the additional traffic flow and all commuters will suffer.
- 3) With the current plan of the bus stops in the center of the road, there may be more pedestrian accidents since no matter which direction you are traveling, you must cross a traffic lane to get to the bus stops. It will also cause a higher risk for accidents to bus riders since there will be traffic flowing on each side of the people who are waiting at the bus stops. The speed at which most vehicles travel down Dillingham must be looked at for pedestrian safety.
- 4) With only one town bound and one Ewa bound lane and the inability to make left turns into driveways and businesses, this will be a major disadvantage to the community and businesses. It will decrease productivity for businesses and result in revenue loss since many customers will avoid the area due to the major inconvenience. The needs of most commuters are concentrated in the few hours of the morning and a few hours in the afternoon but this bus line will be in place twenty four hours a day. It is a major commitment of dollars and inconvenience to the general public for just a few hours each day to accommodate the morning and afternoon commuters.
- 5) Before any construction is to begin, there should be an actual test using cones to create your bus lanes and leaving the one town and one Ewa lane to see how this will affect the other streets and the community. An actual physical test would be more convincing than a plan written on paper. Please do such a test before spending the projected \$322,000.000 for this project.

Commuting Plan

Due to the lack of lanes coming from the H-1 viaduct on to Dillingham, we should look at Nimitz as a possible route for the express bus system. Currently Dillingham has only one lane to exit the H-1 and it is located in the center of all the others lanes. Even if there were two lanes created for an exit, you would still need to be in the center of the H-1 to exit.

Nimitz however has four lanes that exit the H-1, three from the right side and one from the left car pool lane. This seems like a better route to use for the express system.

Route 1) An express bus starts in Waianae and makes a few stops in Nanakuli, Makakilo, and Kapolei then on to the H-1 Zipper lane. After the Zipper lane ends the bus can stay in the car pool lane and exit H-1 from the left exit on to Nimitz. At some point on Nimitz, there should be a stop to drop off and pick up passengers. The next stop would be down town Honolulu and then on to the U.H. Since this first route 1 bus leaves Waianae at sometime around 5:00am or 5:30am, this bus can be used for a 7:00am or 7:30am run from the east side of Honolulu.

Route 2) An express bus starts in Wahiawa and makes a few stops in Mililani, Waipio then on to the Zipper lane. This bus will take the same route as route 1 bus stopping on Nimitz to pick up and drop off passengers. This bus will then stop in down town Honolulu and then on to Waikiki.

Route 3) An express bus starts in Ewa and makes a few stops in Waipahu, Waikale then on to the Zipper lane. This bus will use the same route as the others.

Some of the keys for this project to work will be the use of the Zipper and carpool lane, making fewer stops and changing the traffic lights for quicker flow into town.

Other things to consider would be to look at contraflow lanes on Dillingham, King and School St. as additional ways to get commuters to their destinations quicker. Adding more parking spaces at the U.H. and colleges and starting most of the classes after 9:00. This way students can leave their homes later without having to fight the current traffic with the rest of us. Most students are only in school from 8:00am till 2:00am, this will not create additional traffic in the afternoon since most of them will be out by 3:00pm.

These are only a few suggestions that we may want to look at before we invest and remove lanes from our roads. I realize that Ms. Soon's task of solving the traffic issues are great and I commend her for being open with us at trying to find a solution for all of us. I feel that finding better ways to use our roads at the times that we need it the most are the keys for better traffic.

Sincerely,

*Calvin Tamayo*  
Calvin Tamayo

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 525-4329 • Fax: (808) 525-4730 • Internet: www.cc.honolulu.hi.us



JEREMY HARRIS  
MAYOR

Mr. Calvin Tamaye  
Page 2  
November 13, 2002

CHERYL D. SOON  
DIRECTOR  
GEORGE "KEO" IMAVALOTO  
DEPUTY DIRECTOR

TPD02-00641

November 13, 2002

Mr. Calvin Tamaye  
c/o Ace Auto Glass, Inc.  
2250 Kaimahameha Highway  
Honolulu, Hawaii 96819

Dear Mr. Tamaye:

Subject: Primary Corridor Transportation Project

This is in response to your October 27, 2000 letter regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. As a concerned businessman and fellow commuter, I feel that we should look at an alternative to the current plan of running the buses down the center of Dillingham. I have listed some of the reasons that I feel that this plan will not be effective and why it should be revised.

**RESPONSE:** Comment noted. See responses to comments #7, #8, #9, #10, and #12.

2. The current design calls for the removal of three lanes on Dillingham to make way for two bus lanes. The buses will stop for passengers about every quarter mile. Many of us feel that a quarter mile is too far for many bus riders. Since the buses have to stop at each traffic light and bus stop, this will not accomplish your needs of quicker travel time for the bus.

**RESPONSE:** The proposed project will re-designate two, not three, lanes on Dillingham Boulevard for exclusive BRT use. The center BRT stops will be supplemented by local bus service with more frequent curbside bus stops; bus riders can transfer between the BRT and local buses to more easily access the BRT without being forced to walk the longer distances between BRT stops.

3. The removal of over fifty percent of the lanes on Dillingham and leaving only one town bound and one Ewa bound lane will cause major traffic congestion for King Street and Nimitz Highway. Should a traffic problem or construction work be needed on King Street or Nimitz Highway, Dillingham will not be able to handle the additional traffic flow and all commuters will suffer.

**RESPONSE:** As documented in Chapter 4 of the FEIS, there will be enough people diverted out of the cars onto public transit for Dillingham Boulevard to operate effectively with one general purpose lane in each direction, plus turn lanes at major intersections. Along half of the route, the general purpose lanes will be extra wide so that stopped and right-turning vehicles will not hold up traffic behind it. Along the other half, bus turnouts will be installed so that stopped buses do not block traffic.

Because of the diversion of people from autos to transit, even with the BRT lanes, the traffic LOS along Dillingham Boulevard will be equal to or better than conditions with the No-Build Alternative. Additionally, traffic LOS on parallel streets such as N. King Street and Nimitz Highway will be equal to or in most cases better with the BRT lanes on Dillingham Boulevard than without them.

Moreover, the exclusive BRT lanes on Dillingham Boulevard will enable Dillingham Boulevard to carry 3 times the number of people that it can carry today

4. With the current plan of the bus stops in the center of the road, there may be more pedestrian accidents since no matter which direction you are traveling, you must cross a traffic lane to get to the bus stops. It will also cause a higher risk for accidents to bus riders since there will be traffic flowing on each side of the people who are waiting at the bus stops. The speed at which most vehicles travel down Dillingham must be looked at for pedestrian safety.

**RESPONSE:** The conceptual design of transit stops located in the median includes features such as safety railings along the back of the platforms. The only vehicles using the lane along the front side of the platform will be BRT buses. Traffic signals and crosswalks will be provided at BRT stations to allow pedestrians to safely cross the street. Additionally, the median stops would require passengers to only cross half the street at a time when going to or from a bus stop.

5. With only one town bound and one Ewa bound lane and the inability to make left turns into driveways and businesses, this will be a major disadvantage to the community and businesses. It will decrease productivity for businesses and result in revenue loss since many customers will avoid the area due to the major inconvenience. The needs of most commuters are concentrated in the few hours of the morning and a few hours in the afternoon but this bus line will be in place twenty four hours a day. It is a major commitment of dollars and inconvenience to the general public for just a few hours each day to accommodate and morning and afternoon commuters.

**RESPONSE:** The Refined LPA proposed reallocation of general-purpose lanes for transit is the only reasonable way to achieve greater person carrying capacity in the future. The Refined LPA Alternative will provide an attractive, dependable, affordable alternative to the private automobile.

Along the BRT alignment through Kalia on Dillingham Boulevard, are many retail establishments that serve the Kalia Community. Participation from residents and business owners in the community has been actively sought throughout project planning. A Kalia Working Group was established comprised of Kalia businesses, elected officials, and representatives from civic organizations to provide input and feedback to the engineering team as they refined the details of the BRT project for the FEIS. A topic of discussion in the Kalia Working Group was alternative access to area businesses and maintaining access to businesses during construction. Many refinements were made to the project to accommodate concerns raised. The resultant plan will permit access to all properties fronting Dillingham Boulevard through various means. First off, no driveways will be closed, so there will continue to be access via right-turns in and right-turns out of these driveways. For vehicles traveling along the opposite side of the street, access will be provided via a left-turn or a U-turn at intersections. Additionally, Coburn Street and portions of Kaunualii Street will be improved to provide alternative access to those businesses that have access from both Dillingham Boulevard and these secondary streets.

To minimize the amount of widening required, the physical design of the BRT lanes involves jogs to permit left-turn lanes and median platforms. These jogs will not safely permit use of the lanes by motorists during off-peak hours.

6. Before any construction is to begin, there should be an actual test using cones to create your bus lanes and leaving the one town and one Ewa lane to see how this will affect the other streets and the community. An actual physical test would be more convincing than a plan written on paper. Please do such a test before spending the projected \$322,000,000 for this project.

**Response:** The proposed BRT system is based on ridership experience of the City's existing bus services, including the recently implemented express bus services that use much of the proposed BRT alignment, forecasts of BRT and local bus ridership using regional travel forecasting models, and input received at hundreds of public outreach meetings. A list without all features of the BRT system in place (i.e., limited stop operations in exclusive and semi-exclusive lanes using low-floor vehicles with level boarding through multiple doors, and prepayment of fares) would be misleading and not a true test of the system. For example, the project proposes to completely reconstruct Dillingham Boulevard through the Kalia area to provide significant pedestrian amenities to facilitate access to BRT stations, as well as building new BRT stations and exclusive lanes in the center of the roadway. Without such major reconstruction, it would not be possible to provide the substantial time savings for transit riders through this corridor that would be offered by the BRT. Most importantly, potential new riders would not likely perceive the demonstration service as permanent and would not be induced to change their travel mode.

7. **Due to the lack of lanes coming from the H-1 viaduct on to Dillingham, we should look at Nimitz as a possible route for the express bus system. Currently Dillingham has only one lane to exit the H-1 and it is located in the center of all the others lanes. Even if there were two lanes created for an exit, you would still need to be in the center of the H-1 to exit. Nimitz however has four lanes that exit the H-1, three from the right side and one from the left car pool lane. This seems like a better route to use for the express system.**

**Response:** Since Dillingham Boulevard is a preferable route to Nimitz Highway for serving Kalia residents and businesses, the H-1 Regional BRT buses will exit onto Middle Street to serve the Middle Street Transit center. After dropping-off and picking-up passengers at the transit center, express buses would exit onto Kamehameha Highway (Dillingham Boulevard) and continue into town using the BRT lane on Dillingham Boulevard.

8. **Route 1) An express bus starts in Waialae and makes a few stops in Nanakuli, Makakō, and Kapolei then on to the H-1 Zipper lane. After the Zipper lane ends the bus can stay in the car pool lane and exit H-1 from the left exit on to Nimitz. At some point on Nimitz, there should be a stop to drop off and pick up passengers. The next stop would be downtown Honolulu and then on to the UH. Since this first route 1 bus leaves Waialae at sometime around 5 or 5:30 a.m., this bus can be used for a 7 or 7:30 a.m. run from the east side of Honolulu.**

**Response:** There is an express route in the Refined LPA similar to what is suggested, except that it would take advantage of the Middle Street ramp and the Dillingham Boulevard exclusive lanes rather than using Nimitz Highway.

9. **Route 2) An express bus starts in Waialae and makes a few stops in Māhānu, Waipio then on to the Zipper lane. This bus will take the same route as route 1 bus stopping on Nimitz to pick up and drop off passengers. This bus will then stop in downtown Honolulu and then onto Waikiki.**

**Response:** There is an express route in the Refined LPA similar to what is suggested, except that it would take advantage of the Middle Street ramp and the Dillingham Boulevard BRT lanes rather than using Nimitz Highway. It would also benefit from the proposed direct connector ramp at the Waialae interchange that would permit buses to go directly from the p.m. zipper lane into the H-2 mauka bound HOV lane.

10. **Route 3) An express bus starts in Ewa and makes a few stops in Waipahu, Waikōle then onto the Zipper lane. This bus will use the same route as the others.**

**Response:** There is a route in the Refined LPA similar to what is suggested, with the routing via Dillingham Boulevard instead.

11. **Some of the keys for this project to work will be the use of the Zipper and carpool lane, making fewer stops and changing the traffic lights for quicker flow into town.**

**Response:** The Refined LPA would create an H-1 BRT Corridor consisting of new express and Zipper lanes, allowing express buses from Ewa and Central Oahu to bypass peak period traffic congestion on their way to downtown. Traffic signals would be synchronized and programmed to provide priority to the transit lanes at selected intersections.

12. **Other things to consider would be to look for contraflow-lanes on Dillingham, King and School St. as additional ways to get commuters to their destinations quicker.**

**Response:** The Hawaii DOT has proposed an A.M. peak period contra-flow lane on Nimitz Highway. As far as Dillingham Boulevard, a contra-flow BRT operation was analyzed and rejected due to: 1) the restrictions on left turns and U-turns during peak periods, 2) added operating costs of having to place and pick-up traffic cones twice a day, 3) safety hazard of island BRT boarding platforms that become obstacles that have to be maneuvered around when the contra-flow lanes are not in operation, and 4) loss of benefit to BRT vehicles operating in the reverse direction when the contra-flow lane is in operation. Contraflow lanes on Nimitz Highway, Dillingham Boulevard, and King Street are not possible during the P.M. peak period since there is not the same imbalance in the direction of travel that exists in the A.M. peak.

13. **Adding more parking spaces at the UH and colleges and starting most of the classes after 9:00. This way students can leave their homes later without having to fight the current traffic with the rest of us. Most students are only in school from 8 a.m. to 2 a.m. (sic), this will not create additional traffic in the afternoon since most of them will be out by 3 p.m.**

**Response:** Adjusting hours such as that proposed is consistent with the travel demand management goals of the Oahu Regional Transportation Plan. Adding parking is not. Providing an improved transit alternative such as the Refined LPA would be preferable.

14. **These are only a few suggestions that we may want to look at before we invest and remove lanes from our roads.**

**Response:** Comment noted.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
LAWYER

CHERYL D. SOON  
DIRECTOR

GEORGE YEOGO MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD02-00642

Mr. Katsumi Tanaka  
1141 Waimanu Street, #105  
Honolulu, Hawaii 96814

Dear Mr. Tanaka:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. *I would like to discuss or present in terms of public policy - Number one, what is the state of affairs on the financial reality of today when deliberating projects that will cost more money?*

**Response:** Comment noted. It is the City Council's responsibility to define public policy and determine the City's ability to finance all the city's projects. The Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS), SDEIS, and Final Environmental Impact Statement (FEIS), Chapter 5 discuss the Primary Transportation Corridor Project's financial feasibility.

2. *Number two, the sources for running the project are largely from federal funds and local taxes. Therefore, public policy deliberations should ask, for whose benefit predominantly? What should be the priorities?*

**Response:** All of the alternatives analyzed are focused on serving residents of Oahu with priority on those who live and/or work in the Primary Transportation Corridor.

3. *Who should pay and how should it be paid? Moreover, what happens if it didn't work?*

**Response:** The financial plan indicates the proposed funding sources.

4. *Let me illustrate several examples of what I think should be deliberated upon. The City has many parks that are not used or never been used. Swimming pools that exist that are not used. Libraries. Public transportation should be predominantly for the benefit of local residents. Public transportation should connect them. Teenagers, elderly citizens, could be transported from parks to their homes, to swimming pools, libraries, health care centers.*

**Response:** We concur and the BRT project is one component in Oahu's transportation system that will allow residents, if they so desire, to access parks, swimming pools, their homes, jobs, etc.

5. *Then the issue is, where on Oahu first? Kalakaua Avenue? On Kalakaua Avenue, 21 hours out of 24? Frequency of four minutes to six minutes? Who are likely to be the riders. Of course local residents. But many, many tourists. Did they pay for the taxes?*

Mr. Katsumi Tanaka  
Page 2  
November 13, 2002

**Response:** As is the case in all U.S. cities tourists in Honolulu are permitted to use the public transit system along with residents.

6. *What about the children in Waianae? What about the elderly who are strapped to the radius of about a hundred yards once the only sedan leaves the household? How about, instead of against, be for, for the persons who are - who should be the beneficiaries of public transportation.*

**Response:** The Refined LPA includes improved transit service to Waianae.

7. *Why not connect, why not run, why not give them the best instead of giving the best on Kalakaua Avenue?*

**Response:** The majority of jobs in Waikiki occur near Kalakaua Avenue. The Refined LPA will provide a much faster connection for Waikiki workers who live in Waianae.

8. *Isn't it the obligation, when deliberating, that the taxpayers and the electorate are to become the intended beneficiaries?*

**Response:** The proposed BRT project will give all residents an option to driving their cars for trips.

9. *Moreover, we are talking about scarce resources.*

**Response:** Comment noted.

10. *Moreover, the argument should not be, if you are against BRT, you are against public transportation. I, for one believe that there should be much, much, much more public transportation for local residents. And instead of forcing motorists out of their cars, let's first satisfy those who don't have transportation. They ought to be addressed first before any sort of engineering to force those who already have means of transportation out into tax-subsidized programs.*

**Response:** The Refined LPA is designed to serve those dependent on public transportation as well as attract those who have a choice of modes. There is no attempt to force anyone to use public transportation. To the contrary, the focus is on providing a better more attractive transit system than what is available today so that motorists voluntarily choose to use it.

We will send you a CD-ROM copy of the FEIS under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

will not benefit the majority of the people.

Sincerely,  
*Lila Tarsey*

Lila Tarsey  
Ala Moana Blvd  
lila2000@aol.com

copy to: Ms. Genevieve Salmonson, Director Environmental Quality  
Ms. Donna Turchie, Senior Transportation Representative (FTA)  
dbunda@co.honolulu.hi.us  
holmes@co.honolulu.hi.us  
felix@pixi.com  
bainum@co.honolulu.hi.us  
akobavashi@co.honolulu.hi.us  
reachola@co.honolulu.hi.us

MAY 8 2002

May 5, 2002

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
630 King St., 3<sup>rd</sup> Floor  
Suite 702  
Honolulu, HI #96813

Dear Ms. Soon,

At the urging of friends I attended the meeting you arranged at the Convention Center; otherwise I would have been totally unaware that a new transportation system was being planned. I think there should have been more notice to the neighborhoods about this proposal, I have not heard anything like this since the light rail proposal. I have lived here in Waikiki for 25 years and use the current bus system from time to time and find it very dependable in the Waikiki area.

I don't have knowledge of the traffic difficulties in the outer areas of Hawaii But I do feel that within the Waikiki area you are trying to institute something that IS NOT NEEDED. Your plan to limit certain lanes for BRT only will cause the traffic to be worse, not better. Within Waikiki our current bus system is working well and we need those streets that you want to take away for our Taxi our service vehicles, special transportation vehicles, and private cars.

Ninety percent of the people in Waikiki have a need for private vehicles, taxi, vehicles that transport tourists, and service vehicles, they must be able to use the streets and DO NOT need further congestion that would be caused by losing necessary lanes. The current bus system is adequate for the other 10% and for myself.

If you want the Federal money and you are certain that the project will not cause an increase of property taxes then use the money where it would be most beneficial; transport people from the outer areas to connect with our city buses. It appears to me that you want to force all people to use the new BRT system even though it



DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR

GEORGE YEKOTA \* MIYAMOTO  
DEPUTY DIRECTOR

TPD5/02-01839R

November 13, 2002

Ms. Lila Tarsey  
P. O. Box 75223  
Honolulu, Hawaii 96836

Dear Ms. Tarsey:

Subject: Primary Corridor Transportation Project

This is in response to your comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. At the urging of friends I attended the meeting you arranged at the Convention Center; otherwise I would have been totally unaware that a new transportation system was being planned. I think there should have been more notice to the neighborhoods about this proposal. I have not heard anything like this since the light rail proposal. I have lived here in Waikiki for 25 years and use the current bus system from time to time and find it very dependable in the Waikiki area.

Response: We appreciate you taking the time to comment about the project. The project team has attended numerous Waikiki Neighborhood Board meetings to discuss the project. Also, a Waikiki Neighborhood Board member participated in the Waikiki working group meetings. There have been several articles in the local papers and stories on the local radio and television programs regarding the proposed BRT project.

2. I don't have knowledge of the traffic difficulties in the outer areas of Hawaii. But I do feel that within the Waikiki area you are trying to institute something that IS NOT NEEDED. Your plan to limit certain lanes for BRT only will cause the traffic to be worse, not better. Within Waikiki our current bus system is working well and we need those streets that you want to take away for our taxi our service vehicles, special transportation vehicles, and private cars.

Response: New lanes will be added in parts of Waikiki (Ala Moana Boulevard and Kalia Road) not taken away. Along these streets and the other streets where the In-Town BRT is operating in priority lanes, private buses will be sharing these lanes.

3. Ninety percent of the people in Waikiki have a need for private vehicles, taxi, vehicles that transport tourists, and service vehicles, they must be able to use the streets and DO NOT need further congestion that would be caused by losing necessary lanes. The current bus system is adequate for the other 10% and for myself.

Response: See response to comment # 2.

Ms. Lila Tarsey  
Page 2  
November 13, 2002

4. If you want the Federal money and you are certain that the project will not cause an increase of property taxes then use the money where it would be most beneficial; transport people from the outer areas to connect with our city buses.

Response: The Refined LPA will transport people from the outlying areas to-and-from town.

5. It appears to me that you want to force all people to use the new BRT system even though it will not benefit the majority of the people.

Response: No one will be forced to ride the BRT system. It will provide residents with another transportation option.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE XEONG LAYALACTO  
DEPUTY DIRECTOR

TPD02-00642

November 13, 2002

Ms. Pelly Teruya  
P. O. Box 2308  
Waiānāe, Hawaii 96792

Dear Ms. Teruya:

Subject: Primary Corridor Transportation Project

This is in response to the comment you made on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

Your testimony at the November 14, 2000 Special Transportation Committee Meeting supported the In-Town BRT as the Locally Preferred Alternative (LPA). Thank you for supporting the project.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

# PRIMARY CORRIDOR TRANSPORTATION PROJECT

Island of Oahu, Hawaii

## SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT (SDEIS)

The information you provide on this form will help the City & County of Honolulu and the Federal Transit Administration in the future planning of the Primary Corridor Transportation Project. We appreciate any comment you may have. Comments must be postmarked or received by May 7, 2002.

Name: Baku Thame  
Representing: myself  
Address: \_\_\_\_\_

Please make any comments below:

- 1- There is no room for more buses, it will only create more congestion
  - 2- We don't only ride to go on a joy ride with our cars. We also carry things for work. Kids, grocery and much more
- Bus is not the answer

**PRIMARY CORRIDOR TRANSPORTATION PROJECT**  
 Island of Oahu, Hawaii  
**SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT (SDEIS)**

The information you provide on this form will help the City & County of Honolulu and the Federal Transit Administration in the future planning of the Primary Corridor Transportation Project. We appreciate any comment you may have. Comments must be postmarked or received by May 7, 2002.

Name: Robert James  
 Representing: \_\_\_\_\_  
 Address: 1860 Ala Moana Blvd. 1106

Please make any comments below.

*This plan is pure disaster for  
 residential in the area and Honolulu  
 is a whole fall of alternative  
 travel lanes or public transit.*

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
 650 SOUTH KING STREET, 2ND FLOOR  
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JEREMY HARRIS  
 MAYOR

CHERYL D. SOON  
 DIRECTOR  
 GEORGE YECIO \* MIYAMOTO  
 DEPUTY DIRECTOR

TPD02-00643

November 13, 2002

Ms. Baki Thomas  
 1860 Ala Moana Boulevard, #2304  
 Honolulu, Hawaii 96815-1640

Dear Ms. Thomas:

Subject: Primary Corridor Transportation Project

This is in response to your comment form regarding the Supplemental Draft Environmental Impact Statement (SDEIS).

1. *There is no room for more buses, it will only create more congestion.*  
**Response:** Chapter 4 of the FEIS fully discusses the consequences of converting selected general purpose lanes to priority use by transit vehicles.  
 When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.
2. *We don't only go on a joy ride with our cars, we also carry things for work, kids, groceries. Bus is not the answer.*  
**Response:** Comment noted.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
 Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE WEOGI • MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD02-00644

Mr. Robert Thomas  
1860 Ala Moana Boulevard, #1106  
Honolulu, Hawaii 96815

Dear Mr. Thomas:

Subject: Primary Corridor Transportation Project

This is in response to your comment form regarding the Supplemental Draft Environmental Impact Statement (SDEIS).

*This plan is pure disaster for residents in this area and Honolulu as a whole. Talk of alternative travel lanes as substitute is bull.*

Response: Comment noted. No response is required.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE WEOGI • MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD02-00645

Mr. Steve Tiemey  
1550 Wilder Avenue, #1010  
Honolulu, Hawaii 96822

Dear Mr. Tiemey:

Subject: Primary Corridor Transportation Project

This is in response to your testimony at the October 12, 2000 Public Hearing regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. *Whichever method is chosen, whether it's the No-Build or the TSM or BRT, I really would like to see quieter buses. When you're sitting at a bus stop and a bus comes up and it passes on, it makes a lot of noise. If you live close to a bus route, that noise wakes you up in the morning. So whatever, quieter buses would be really appreciated.*

Response: Both vehicle technologies under consideration, embedded-plate and hybrid electric, would be substantially quieter than the existing diesel buses.

2. *Another thing that would be good would be a periodic shoppers bus designed especially to accommodate shoppers with shopping carts. Maybe every third or fourth bus on that line could be especially designed to accommodate this. Right now, large baggage can't be carried on the current buses.*

Response: Duly noted, however no change in current policy regarding shopping carts is presently proposed.

3. *Something else that would be useful would be restrooms in the hubs. I know Kalihi Transit Center has that, but some of the hubs don't. I don't know if people are considering Punchbowl and King or Punchbowl and Beretania as a hub, but I think it is. It would be nice if there were public restrooms there.*

Mr. Steve Tierney  
Page 2  
November 13, 2002

Response: Restrooms and other amenities are planned to be installed at many of the transit centers.

4. *Also, a very good thing to have would be at the bus stops, especially the frequently used ones where overlapping lines occur, would be a waiting time indicator for the bus that's coming and how many minutes it would be before it gets there. This can be done pretty easily, I think, with global positioning on each bus, or some kind of system on each bus. Star, especially heavily used ones.*

Response: As part of the Refined LPA, information on the arrival time of the next bus would be available at transit centers and major BRT stops.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

September 25, 2000

Duke Bainum  
Chair, Transportation Committee  
City & County of Honolulu

Re: Primary Corridor Transportation Project  
Major Investment Study/Draft EIS

Chair Bainum, Committee Members:

Welcome to Kapolei and thank you for this meeting on a very important matter to our community - Transportation.

My name is Maeda Timson. I am Chair our Kapolei Neighborhood Board, and have been active with the Hub and Spoke Project and other Transportation matters such as the Wiki/Wiki Ferry and Express Bus. I also must commute into town and back every day during peak and non-peak hours. I have also spoke to numerous bus and car riders from Makakilo, Honokai Hale, Villages of Kapolei, and Ewa Villages.

I would like to comment on what I feel is the best-proposed alternative based on my personal experience and that of other community members.

The BRT alternative is best suited for our community. Because of our diverse and growing population in the City of Kapolei this method offers fast, efficient, dependable service which is also environmentally friendly preserving our open spaces and the beauty of Leeward Oahu. We have students, retirees, working people and tourist who frequent The Bus to and from the Leeward Coast and Ewa Plains as well as these same groups of people who must use their automobiles. By using this method to improve public transportation, community can leave their cars at home, save money on gas and save their sanity and lower their stress level of driving in traffic! It will also expand new friendships that otherwise would not happen.

Please support the Bus Rapid Transit alternative.

Sincerely,



Maeda Timson

Maeda G. Timson, 92-684 Nohona St., Kapolei, HI. 96707, Ph # 672-9414; Chair, Makakilo/Kapolei/Honokai Hale Neighborhood Board; Vice Chair, Barbers Point Redevelopment Commission; Program Chair, Girl Scouts of Hawaii; Member, Makakilo Elementary SCBM; Member, Campbell Industrial Park Air Quality Task Force; Vice Chair, Campbell Industrial Park's Community Participation Committee of CLEAN

RECEIVED  
SEP 26 9 28 AM  
CITY CLERK  
HONOLULU, HAWAII

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
630 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 522-4329 • Fax: (808) 522-4730 • Internet: www.cc.honolulu.gov



JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE "KIDOO" UYAMOTO  
DEPUTY DIRECTOR

TPD02-00646

November 13, 2002

Ms. Maeda Timson  
92-684 Nohona Street  
Kapolei, Hawaii 96707

Dear Ms. Timson:

Subject: Primary Corridor Transportation Project


This is in response to your September 25, 2000 letter which provided your comment on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

*The BRT is best suited for our community. Because of our diverse and growing population in the City of Kapolei this method offers fast, efficient, dependable service which is also environmental friendly preserving our open spaces and the beauty of Leeward Oahu.*

Response: Thank you for supporting the project.

We appreciate your interest in the project.

Sincerely,

  
CHERYL D. SOON  
Director

RECEIVED  
Oct 4 7 32 AM '00  
CITY CLERK  
HONOLULU, HAWAII

October 3, 2000

MEMO

To: City Clerk

From: Howard Tocman,  
Lilepono #808, 98-099 Uso Place, Aiea

Re: Community Meeting on 10/19/00 @ 6:30 p.m.

As a homeowner across the street from the proposed site I would like to register my dissatisfaction with the idea of creating a bus terminal or turnaround right outside my bedroom window. It is bad enough we have to be disturbed by the 5:30 a.m. noise of the swap meet on Wednesday, Saturday & Sunday. Now we will have extra noise everyday.

What happened to the idea of creating a much needed park for the many youth and families in the area? That was an idea with true merit that deserves to be put forward.

If the City & County has the money to acquire this parcel and build a bus terminal then it could easily afford to turn it into the much needed park instead. This is not a matter of "not in my back yard" but rather having government give us what we really need.....a park!

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR  
GEORGE YEKOKI MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD02-00647

Mr. Howard Tocman  
98-099 Uao Place, #808  
Aiea, Hawaii 96701

Dear Mr. Tocman:

Subject: Primary Corridor Transportation Project

This is in response to your October 3, 2000 memo regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MISEIS).

1. *As a homeowner across the street from the proposed site I would like to register my dissatisfaction with the idea of creating a bus terminal or turnaround right outside my bedroom window. It is bad enough we have to be disturbed by the 5:30 a.m. noise of the swap meet on Wednesday, Saturday & Sunday. Now we will have extra noise everyday.*  
Response: The former Kamehameha Drive-In is no longer being considered for a transit center site.

2. *What happened to the idea of creating a much needed park for the many youth and families in the area? That was an idea with true merit that deserves to be put forward. If the City & County has the money to acquire this parcel and build a bus terminal then it could easily afford to turn it into the much needed park instead. This is not a matter of "not in my back yard" but rather having government give us what we really need...a park!*  
Response: The former Kamehameha Drive-In is no longer being considered for a transit center.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

APR 20 2002

April 20, 2002

Ms. Cheryl Soon, Director  
Department of Transportation  
City & County of Honolulu  
650 South King Street  
Honolulu, Hawaii 96813

Dear Ms. Soon:

Subject: Testimony in Support of the Bus Rapid Transit System

The City and County of Honolulu desperately needs a modern, efficient public transportation system. The daily grid lock on our highways and roads is getting worse every year.

I am aware of other Cities, such as Portland, Oregon where a well planned rapid transit system was a cornerstone for redevelopment and economic revitalization in the City. It was also used in the land use planning for future growth in the Portland metropolitan area.

Efficient transportation systems for moving people and commerce has been sorely needed in our city for some time now. The City's Bus Rapid Transit System provides people with a realistic commuting alternative that will reduce travel time. Also, as in the case of Portland, I expect that BRT will provide new business opportunities in redevelopment area.

I am in support of the continued work and development of the Bus Rapid Transit System for the City and County of Honolulu.

Thank you for providing me an opportunity to testify.

Dean Uchida

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 522-4529 • Fax: (808) 522-4720 • Internet: www.cc.honolulu.hi.us

JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE YEKOU MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD02-00648

Mr. Dean Uchida  
98-1762 Kupukupu Street  
Aiea, Hawaii 96701

Dear Mr. Uchida:

Subject: Primary Corridor Transportation Project

This is in response to your comment form regarding the Supplemental Draft Environmental Impact Statement (SDEIS).

1. The City and County of Honolulu desperately needs a modern, efficient public transportation system. The daily grid lock on our highways is getting worse every year.

Response: We appreciate you expressing your views regarding public transportation.

2. I am aware of other cities, such as Portland, Oregon where a well planned rapid transit system was a cornerstone for redevelopment and economic revitalization in the City. It was also used in the land use planning for future growth in the Portland metropolitan area.

Response: We concur that Portland has had great success with their transit system and that system has helped economic development and redevelopment.

3. Efficient transportation systems for moving people and commerce has been sorely needed in our city for some time now. The City's Bus Rapid Transit System provides people with a realistic commuting alternative that will reduce travel time. Also, as in the case of Portland, I expect that BRT will provide new business opportunities in redevelopment area

Response: These are consistent with findings in the FEIS.

4. I am in support of the continued work and development of the Bus Rapid Transit System for the City and County of Honolulu.

Response: Thank you for supporting the BRT project and for sharing your views.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE YEKOU MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD02-00649

Mr. Jon von Kessel  
c/o Government Efficiency Teams  
1645 Ala Wai Boulevard, Apt. 1304  
Honolulu, Hawaii 96815

Dear Mr. von Kessel:

Subject: Primary Corridor Transportation Project (PCTP)

This is in response to your testimony at the October 5, 2000 Special Transportation Committee Meeting regarding comments on the Major Investment Study/Draft Environmental Impact Statement (MIS/DEIS).

1. So, this then brings us to the next point of when we have fixed guideways on certain routes such as the A, B and C bus routes. We end up having a severe problem when those do not intersect with other transit routes. Perfect example is the A route crossing Kalanika and Keptolani. You still have to walk another two and a half blocks to come back to catch the bus to go the other way. So, that is an alignment of bus stops that must be done. And that is very relevant to what you're proposing. Whether it's accepted or not, it has to do with all transportation.

Response: All existing bus routes will be evaluated for re-routing to intersect with the BRT at or near the proposed BRT stops. The In-Town BRT is only one element of the transit plan for the Primary Urban Center. The plan also includes conversion of the bus system to a hub-and-spoke network which will consist of new local circulator routes, as well as continuation of many existing line haul and express routes. The goal is to have an integrated network of transit services that provide convenient and cost-effective options for potential users.

2. The BRT is being proposed as a quasi-rail system. You have dedicated space with dedicated hardware infrastructure that is for the purpose which is quasi the same as a rail system. Whereas a full rail system obviously is going to restrict any use by other activities. So, that must be considered. So, then with the closing summary is if in fact one has to walk more than three or four blocks they're not going to use whatever transportation services are available particularly if they've got groceries or whatever in their arms. So, having things dedicated onto streets that are not conducive of the other transportation mixes then we're looking for doom.



Mr. Jon von Kessel  
Page 2  
November 13, 2002

Response: In-Town BRT stop spacing is between 1/4- and 1/2-mile apart. This is typical for a high capacity, limited stop service. It offers a balance of faster speeds with convenience to destinations acceptable to most passengers. To serve passengers who may find the stop spacing too far apart there will be interconnecting local bus service and circulator routes to which they can transfer for completing their journeys.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

May 3, 2002

Lea Sasak Watts  
1777 Ala Moana #1810  
Honolulu, HI 96815

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
City and County of Honolulu  
650 King St., 3<sup>rd</sup> Floor  
Suite 702  
Honolulu, HI #96813

Dear Ms. Soon,

I attended the recent meeting at the Convention Center where plans were displayed by Transportation Services to show the proposed Bus Rapid Transit route.

I have had an apartment on Ala Moana Blvd since 1975 and I do not own a car, so I depend on The Bus and taxis for my transportation. My experience with the current bus system has been good within the Waikiki area, and find they are on time and offer a good schedule.

I have studied your plans and believe that your plan to take away two lanes on Ala Moana Blvd and Kalakaua for strictly BRT use will be disastrous. I consistently travel these two streets by bus and by taxi, and not enough space exists to dedicate two lanes to the new BRT without causing complete gridlock.

Tourist arrive in Waikiki by taxi and special transportation vehicles from the airport using the Nimitz to Ala Moana Blvd to Kalakaua.

The new BRT that you are planning will never be the answer to their needs; yet they and the people who provide their transportation are the most consistent users of these particular streets. Hawaii's business is tourism, and the BRT added to the downtown Honolulu or Waikiki will not be encouraging to that business. In fact if you try to force everyone onto the bus Honolulu will lose the reason it exists, it will lose its tourists. Even now we are losing tourist because we are overbuilt.

We must continue to keep the beaches beautiful and unobstructed, we need more trees and greenery, and as much open space as we possibly can get to present a beautiful area to which our tourist will want to return. I understand your plan provides for removing the trees and greenery from the middle of Ala Moana Blvd and also other streets to provide extra space for this new BRT., that would be a mistake, we need to keep every inch of beauty that we have, that is the basis of our business here in Hawaii. Again our current bus system is working

MAY - 8 2002

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 533-4329 • Fax: (808) 525-1700 • Internet: www.co.honolulu.hi.us



JEREMY HARRIS  
MAYOR

CHERYL D. SOOHI  
DIRECTOR

GEORGE Y. KEOGI  
DEPUTY DIRECTOR

TPD5/02-01838R

November 13, 2002

Ms. Lea Sasak Watts  
1777 Ala Moana Boulevard, #1810  
Honolulu, Hawaii 96815

Dear Ms. Watts:

Subject: Primary Corridor Transportation Project

This is in response to your May 3, 2002 letter regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. *I attended the recent meeting at the Convention Center where plans were displayed by Transportation Services to show the proposed Bus Rapid Transit route.*

**Response:** Comment noted. We assume that you are referring to the SDEIS April 20, 2002 Public Hearing held at the Convention Center.

2. *I have had an apartment on Ala Moana Blvd. since 1975 and I do not own a car, so I depend on TheBus and taxis for my transportation. My experience with the current bus system has been good within the Waikiki area, and find they are on time and offer a good schedule.*

**Response:** Comment noted.

3. *I have studied your plans and believe that your plan to take away two lanes on Ala Moana Blvd. and Kalakaua for strictly BRT use will be disastrous. I consistently travel these two streets by bus and by taxi, and not enough space exists to dedicate two lanes to the new BRT without causing complete gridlock.*

**Response:** No lanes will be taken away on Ala Moana Boulevard in Waikiki, in fact lanes will be added. Through re-striping and narrowing of the median an additional lane in each direction for priority use by buses and right-turning vehicles will be added. One lane on the section of Kalakaua Avenue between Saraloga Road and Ulunlu Avenue will be converted for shared use by BRT buses, private buses and right-turning autos.

4. *Tourist arrive in Waikiki by taxi and special transportation vehicles from the airport using the Nimitz to Ala Moana Blvd. to Kalakaua. The new BRT that you are planning will never be the answer to their needs; yet they and the people who provide their*

well in Waikiki, why not just improve it where needed? Maybe you need to build a BRT system to help people from outlying areas to reach Honolulu and Waikiki to connect with our current bus system; why don't you concentrate on that possibility.

Sincerely,

Lea Sasak Watts

Copies: Ms. Genevieve Salmonson, Director Office of Environmental Quality

Ms. Donna Turcotte, Senior Transportation Representative (FTA)

E-mails [dbunda@co.honolulu.hi.us](mailto:dbunda@co.honolulu.hi.us)

[holmes@co.honolulu.hi.us](mailto:holmes@co.honolulu.hi.us)

[felix@pxi.com](mailto:felix@pxi.com)

[bainumi@co.honolulu.hi.us](mailto:bainumi@co.honolulu.hi.us)

[akohayashi@co.honolulu.hi.us](mailto:akohayashi@co.honolulu.hi.us)

[teachola@co.honolulu.hi.us](mailto:teachola@co.honolulu.hi.us)

[goekinno@co.honolulu.hi.us](mailto:goekinno@co.honolulu.hi.us)

**PRIMARY CORRIDOR TRANSPORTATION PROJECT**  
 Island of Oahu, Hawaii  
**SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT (SDEIS)**

The information you provide on this form will help the City & County of Honolulu and the Federal Transit Administration in the future planning of the Primary Corridor Transportation Project. We appreciate any comment you may have. Comments must be postmarked or received by May 7, 2002.

Name: Lafane West  
 Representing: \_\_\_\_\_  
 Address: Iliahi 1310

Please make any comments below:

come off Waikiki area  
for weeks before its  
a final

Ms. Lea Sasaki Watts  
 Page 2  
 November 13, 2002

transportation are the most consistent users of these particular streets. Hawaii's business is tourism, and the BRT added to the downtown Honolulu or Waikiki will not be encouraging to that business. In fact if you try to force everyone onto the bus Honolulu will lose the reason it exists, it will lose its tourists. Even now we are losing tourists because we are overbuilt.

Response: Private buses and mini-buses that transport tourists to-and-from the Airport will be able to use the BRT lanes in Waikiki. The BRT will not be competing with these private services since it will not serve the Airport.

5. We must continue to keep the beaches beautiful and unobstructed, we need more trees and greenery, and as much open space as we possibly can get to present a beautiful area to which our tourist will want to return. I understand your plan provides for removing the trees and greenery from the middle of Ala Moana Blvd. and also other streets to provide extra space for this new BRT., that would be a mistake, we need to keep every inch of beauty that we have, that is the basis of our business here in Hawaii.

Response: The landscaped median on Ala Moana Boulevard will remain. However in some locations the median will be narrowed and new trees planted to replace any that are removed.

6. Again our current bus system is working well in Waikiki, why not just improve it where needed?


Response: Waikiki is one of the densest residential and employment sites on the island. Connecting it to other parts of the island by the In-Town BRT will help reduce the number of autos and buses circulating in Waikiki.

7. Maybe you need to build a BRT system to help people from outlying areas to reach Honolulu and Waikiki to connect with our current bus system; why don't you concentrate on that possibility.

Response: See response to comment # 6.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

  
 CHERYL D. SOON  
 Director

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

44/02-1631

APR 25 2002

LaVonne West

4-23-02

Ms. Soon,

Please please try before you all  
boy, especially in Waikiki BRT. May  
I suggest (strongly) that barricades  
starting at Hokon & Ala Moana be  
installed for the route BRT will take  
through Waikiki for 30 days. IRY  
last Sat. The 20<sup>th</sup> it took me 3  
signals to get through the Hokon/Ala  
Moana because of an arthritis  
walk - 1 lane coned.

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

600 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE XEDOU MYAMOTO  
DEPUTY DIRECTOR

TPD4/02-01631R

November 13, 2002

Ms. LaVonne West  
1777 Ala Moana Boulevard  
Honolulu, Hawaii 96815-1606

Dear Ms. West:

Subject: Primary Corridor Transportation Project

This is in response to your comment form and April 23, 2002 letter regarding the Supplemental Draft Environmental Impact Statement (SDEIS).

1. Cone off Waikiki area for weeks before it's a final.

Response: A test of closing a lane is not a test of what will happen with the Bus Rapid Transit (BRT), it is only a test of what happens when a lane is closed which is something everyone knows the consequence of from when lanes are temporarily closed during utility construction.

As is pointed out in Chapter 4 of the Final Environmental Impact Statement (FEIS), over time there will be enough people diverted from autos to transit to offset the impact of converting lanes for priority use by buses. This diversion from autos will only happen once it is clear that the BRT installation is a permanent improvement, not part of some test.

What is proposed with the first In-Town BRT branch between Iwilei and Waikiki will be a good test of the ability of BRT to attract new riders and the impacts of converting lanes in selected locations.

2. I would like to see the implementation of cones in Waikiki, have it all coned off, and cone it for a month before you put the buses in and do anything else.

Response: See response to comment # 1.

**PRIMARY CORRIDOR TRANSPORTATION PROJECT**  
 Island of Oahu, Hawaii  
**SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT (SDEIS)**

The information you provide on this form will help the City & County of Honolulu and the Federal Transit Administration in the future planning of the Primary Corridor Transportation Project. We appreciate any comment you may have. Comments must be postmarked or received by May 7, 2002.

Name: Don Mathrew

Representing: \_\_\_\_\_

Address: 1717 Ala Wai Blvd, #1904  
Honolulu, HI 96815-1504

Please make any comments below: 943-1196

How come the city hasn't tried to ease our traffic congestion by widening our traffic lights, such as they are on the Ala Wai?

Ex. Keolu Blvd. between Keolu and Berea. Some times it takes over 20 mins to go just 7 to 9 blocks. Why can't the lights be timed so the traffic moves more smoothly?

Ms. LaVonne West  
 Page 2  
 November 13, 2002

3. Please, please try before you all buy, especially in Waikiki BRT. May I suggest (strongly) that barricades starting at Hobron and Ala Moana be installed for the route BRT will take thru all Waikiki, for 30 days. "Try."

Response: See response to comment # 1.

4. Last Saturday the 20th it took me 3 signals to get through the Hobron / Ala Moana because of an arthritis walk - 1 lane coned.

Response: Comment noted. No response required.

We will send you a CD-ROM copy of the FEIS under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
 Director

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

DEPARTMENT OF TRANSPORTATION SERVICES  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE 'KEOKU' MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD02-00650

Mr. Don Withrow  
1717 Ala Wai Boulevard, #1904  
Honolulu, Hawaii 96815-1504

Dear Mr. Withrow:

Subject: Primary Corridor Transportation Project

This is in response to your comment form regarding the Supplemental Draft Environmental Impact Statement (SDEIS).

1. *How come the city hasn't tried to ease our traffic congestion by refining our traffic lights, such as they are on the Ala Wai?*

**Response:** The City has a state of the art traffic management center. It also has an ongoing traffic signal optimization program. Given the large number of traffic signals in Honolulu, it will take time to optimize all of the signals, but the process has been initiated and the public will see the benefits from this program in the near future.

2. *Ex. Keeaumuku Blvd. between Kepioli and Beretania. Sometimes it takes over 20 minutes to go just 7 to 9 blocks. Why can't the lights be timed so the traffic moves more smoothly?*

**Response:** See response to comment #1.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
MAYOR



CHERYL D. SOON  
DIRECTOR  
GEORGE 'KEOKU' MIYAMOTO  
DEPUTY DIRECTOR

November 13, 2002

TPD02-00654

Mr. Greg Wongphan  
2333 Kapiolani Boulevard, #3416  
Honolulu, Hawaii 96828-4479

Dear Mr. Wongphan:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. *I'm opposed to the BRT for the simple reason that many of the areas that you have on plan for development of the BRT will create a lot more congestion.*

**Response:** Chapter 4 of the FEIS fully discusses the consequences of converting selected general purpose lanes to priority use by transit vehicles.

When people are diverted onto public transit, congestion for motorists will be less with the Refined LPA than it would be with the No-Build or TSM Alternatives. Conditions will be much better for BRT riders with the Refined LPA since they will have a path clear of the congestion along much of the In-Town and Regional BRT routes.

2. *I'm particularly concerned about the area in Waikiki as the BRT enters into Waikiki through Ala Moana. As many people who know that live in that area, not only today, but in the past, realize that this is one of the most heavily occupied areas, residential and otherwise, in the whole state of Hawaii. And to bring BRT into that particular neighborhood flies in the face of reason.*

**Response:** By narrowing the lane widths and reducing the median somewhat, it will be possible with the Refined LPA to add two semi-exclusive curb lanes on Ala Moana Boulevard while still maintaining the same number of general purpose traffic lanes.

3. *And I think what everybody should realize is that what the State is doing and the County is doing is moving very aggressively into the process of privatizing. I think a lot of us, when we think about and hear the term "privatization," we think of smaller government, we think of less costly government. But in this particular case, I think, in recent history, the way politics have moved in the state of Hawaii, we realize that privatization means paying off people on the inside, and it goes against the common good of the public.*

**Response:** Comment noted. No response required. This is a statement regarding privatization and payoffs, which are beyond the project scope.

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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JEREMY HARRIS  
COUNCILOR

CHERYL D. SOON  
DIRECTOR

GEORGE REONG MIYAMOTO  
DEPUTY DIRECTOR

TPD02-00655

November 13, 2002

Mr. Louis Xigogianis  
430 Lewers Street, Apt. 6B  
Honolulu, Hawaii 96815

Dear Mr. Xigogianis:

Subject: Primary Corridor Transportation Project

This is in response to your oral testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. *And I would like to say that when Cheryl Soon gave a presentation to – I think it was the Waikiki Residents Association several months ago about the BRT, I liked it. I thought it was very sleek.*

Response: Thank you for attending the public hearing.

2. *But since then, I've changed my mind. And after a lot of the testimony today, I feel that it has quite a few problems that haven't been answered.*

Response: We appreciate you expressing your views regarding the proposed project.

3. *And I would like to propose a compromise, and that is, we should work on our present bus system and extend it, improve it, and do all kinds of things to encourage people to ride the present bus system.*

Response: The Refined LPA will be phased in over a 13-year period. The initial years will be focused on what you suggest, namely improving the existing bus system including installing the In-Town BRT.

4. *I'm a senior citizen, and I have my bus pass, and I have a car. I live in Waikiki. But I take the bus whenever I go to town, just about every time I go to town, because it's so much simpler. It takes a little longer than driving, but then you don't have to worry about the parking.*

Response: Thank you for using the bus system. The BRT system will provide you with an additional transportation mode to use in making trips.

Mr. Greg Wonghan  
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November 13, 2002

4. *The cost of this edifice here was three hundred and fifty some odd million. Over the next 20 years, the cost of floating bonds and so forth, with interest, will be in excess of one billion dollars. So we're talking about approximately three times the cost. If you're talking about 1.6 billion for the BRT, we're looking at three to four billion dollars. And as many of us know, with this economy, we're having a real tough time satisfying the debt that's created by these bonds.*

Response: The amount to be paid for with City GO Bonds is \$359.5 million, not \$1.6 billion.

5. *What a lot of people don't know, that every three years, the State of Hawaii basically experiences a spike with respect to the payment of interest on these bonds.*

Response: The 5.5 percent interest rate reflects the Bond Buyer 11 High Grade GO Bond Index, at a 25-year maturity. This industry standard takes into consideration historical fluctuations.

6. *And so you know what we do folks, when we get that spike? Well, what the State has decided, in their infinite wisdom, is to go out and float a whole other set of bonds just to pay for the interest. Isn't that exciting? That's the kind of budgeting and planning I think that we're embracing as we aggressively move towards privatization. What we're losing in the process is the present and future common good of the public.*

Response: Comment noted.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE WAKOHA  
DEPUTY DIRECTOR

TPD02-00656

November 13, 2002

Mr. Ron York  
1824 Dillingham Boulevard  
Honolulu, Hawaii 96819-4019

Dear Mr. York:

Subject: Primary Corridor Transportation Project

This is in response to your testimony at the April 20, 2002 public hearing regarding comments on the Supplemental Draft Environmental Impact Statement (SDEIS).

1. I am a property owner on the Dillingham corridor. First, I want to say I really think the process is fraught from the informational position. As a property owner along the corridor, the only way I found out that there was something happening in that area is by one of my cohorts that lives across the street saying they're holding some meetings. None of us were ever informed. And something of this magnitude, that is going to have a financial impact on the worth of the people's property and also the employment of these people, they should have the information before they sign extension on leases, because this construction cycle is going to take a long period of time. All right.

**Response:** The project's public involvement process began in 1998 with the TRANS 2K meetings. There have been hundreds of meetings regarding the project, including the working groups formed to give the public a better understanding of the project. The working groups input resulted in project changes, which are reflected in the SDEIS. The project has been the subject of numerous newspaper articles plus radio and television spots. In addition, the eight project newsletters have each been distributed to over 10,000 people on the project mailing list.

2. I have a letter here that we addressed, with Romy Cachola, to Cheryl Soon, asking for answers. And it says, "How will BRT impact Teamsters trucking industries who depend on timely delivery of goods and services, that cannot happen when two lanes of traffic will be designated solely for BRT, leaving just one lane in each direction?" Cheryl Soon's answer: "In Dillingham Boulevard corridor, the BRT team has worked with each of the business and property owners on Dillingham to insure that access for both delivery trucks and customers will be maintained." Nobody has ever contacted and nobody can show me a written letter that has been given to any business or lessee along the corridor. And this is going to really impact, because most of those people rely on people crossing the center lane to get into their property and their small little parking areas, and we are going to lose all of that. All right. So we never was informed correctly. And that's disturbing. Okay.

**Response:** Representatives of businesses on Dillingham Boulevard participated in a series of workshops the City held with the Kaali Business Association and were participants in the Kaali Working Group meetings. Alternatives to maintaining access to businesses along Dillingham Boulevard were developed at these meetings.

Mr. Louis Xigogianis  
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5. And I think that, if you live out in the country, they already have Express buses. I think that could be improved upon. I think if you live in Manoa or some of the mountain areas and the ridges, I think that that - that those areas could be better served if they had buses that went around and around and around met up with the main line buses. Because many people that live in Manoa don't want to take the bus because it only runs every 45 minutes or so, and it only runs maybe till 10 o'clock at night. And so if you come in to Waikiki, why, you can't take the bus home.

**Response:** That is what is proposed with the Refined LPA.

6. I'm in favor of the present bus system, so let's spend some of the money you were going to spend on the BRT, let's put that into the present bus system, improve that, and then think about the future, since so many people are worried about the future - we should be - and maybe consider a monorail system for the future.

**Response:** That is what is proposed with the Refined LPA.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director



Mr. Ron York  
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Mr. Ron York  
Page 3  
November 13, 2002

3. *The thing also that bothers me is that we have construction going on around this island in the same areas on continuous years. Dillingham is a prime corridor for that. The end of H-1 Freeway, Anakoa Street, prime targets for that. I strongly suggest that, whatever kind of transit system you people ever design, that you turn around and work below the grade first and make sure everything is updated below the grade before you put any concrete or blacktop down, because you people are going to be the severe impact that you're going to have on traffic, not the traffic. Okay.*

**Response:** Efforts to coordinate with other projects has already begun. These coordination efforts will continue through the final design and construction phases.

4. *In regards to Dillingham becoming only a two-lane highway, Dillingham is one of only five hub roadways that go into town, probably the second largest transportation artery going into town. And to perceive that you can take two lanes of that traffic out of there and not impact traffic is absurd. That traffic right now is blocked up past the airport on-ramp. It will be way out towards Radford area. All right. You have three lanes of traffic that people jump trying to get in at the last minute, so you're going to block all of the traffic to the Express lane that gets you down to Nimitz Highway. All right.*

**Response:** As documented in Chapter 4 of the FEIS, there will be enough people diverted out of the cars onto public transit for Dillingham Boulevard to operate effectively with one general purpose lane in each direction, plus turn lanes at major intersections. Along half of the route, the general purpose lanes will be extra wide so that stopped and right-turning vehicles will not hold up traffic behind it. Along the other half, bus turnouts will be installed so that stopped buses do not block traffic.

Because of the diversion of people from autos to transit, even with the BRT lanes, the traffic LOS along Dillingham Boulevard will be equal to or better than conditions with the No-Build Alternative. Additionally, traffic LOS on parallel streets such as N. King Street and Nimitz Highway will be equal to or in most cases better with the BRT lanes on Dillingham Boulevard than without them.

Moreover, the exclusive BRT lanes on Dillingham Boulevard will enable Dillingham Boulevard to carry 3 times the number of people that it can carry today.

5. *All of the surface work that has to be done on any road in this state is done from the right-hand lane. That means water, sewers, gas lines, all of that is in the right-hand lane, and that has been to be serviced by our municipality utility companies, which will block all traffic. Right now you have three to four buses that plowback down the road because they can't get distances between themselves. And now you're going to make that even worse.*

**Response:** See response to comment #3.

6. *How are you going to get transportation deliveries when they can't pull off the road? How are the mail people going to get in when they can't pull off the road? So you have some serious problems here that I would like to see you come up with solutions for first before anybody can supporting a system like this.*

**Response:** Most businesses on Dillingham Boulevard have off-street areas where delivery vehicles can park. Others have rear access via parallel streets such as Coburn and Kaunuaui Streets.

We will send you a CD-ROM copy of the Final Environmental Impact Statement (FEIS) under separate cover. If you require a printed copy of the FEIS, please contact Faith Miyamoto at 527-6976. We appreciate your interest in the project.

Sincerely,



CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JERRY HARRIS  
Mayor

CITY CLERK  
HONOLULU, HAWAII  
November 10, 2000

RECEIVED

Nov 13 8 48 AM '00

JOSEPH W.C. YOUNG, DDS  
317 NENUA STREET  
HONOLULU, HAWAII 96821

CHERYL D. SOON  
DIRECTOR

GEORGE KEONG KITAYAMOTO  
DEPUTY DIRECTOR

TPD02-00657

November 13, 2002

Honorable Chairman and Committee Members,

My name is Joseph Young and I am speaking in favor of the Bus Rapid Transit (B.R.T.).

After years of research and study the City, with many meetings with the community arrived at alternatives.

This alternative is not only for the present but especially for the future.

We all know that the traffic is getting worse everyday and the cost of gasoline is going up more frequently.

The increase in traffic can't be helped due to progress. This is experienced in all cities.

To alleviate this situation is to select the B.R.T. alternative, a more benign and affordable solution to the situation.

Here are some of the reasons why B.R.T. is the best choice:

- 1) This alternative will improve mobility.
- 2) This will provide people who do not drive, a better way to travel.
- 3) The project's finances will be shared by the Federal Government.
- 4) It will result in less pollution.
- 5) It will reduce the building of more highways.
- 6) It will especially link our 2<sup>nd</sup> city with downtown Honolulu.

There are many other good reasons.

The time to act is now.

Therefore I ask you to favorably consider the B.R.T. alternative.

Sincerely,

*Joseph W.C. Young*  
Joseph W.C. Young, D.D.S.

Joseph W.C. Young, DDS  
317 Nenua Street  
Honolulu, Hawaii 96821

Dear Dr. Young:

Subject: Primary Corridor Transportation Project

This is in response to your comments on the MIS/DEIS. We are responding to your November 10, 2000 letter and your testimony at the November 14, 2000 Special Transportation Committee Meeting regarding the MIS/DEIS:

1. My name is Joseph Young and I am speaking in favor of the Bus Rapid Transit (B.R.T.).

Response: Comment noted. Thank you for supporting the project.

2. Here are some of the reasons why B.R.T. is the best choice:

- a) This alternative will improve mobility.
- b) This will provide people who do not drive a better way to travel.
- c) The project's finances will be shared by the Federal Government.
- d) It will result in less pollution.
- e) It will reduce the building of more highways.
- f) It will especially link our second city with downtown Honolulu.

Response: DTS agrees with these statements.

We appreciate your interest in the project.

Sincerely,

*Cheryl D. Soon*  
CHERYL D. SOON  
Director

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
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JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE KONO'URUAMOTO  
DEPUTY DIRECTOR

TPD02-00658

November 13, 2002

Ms. Pam Young  
P.O. Box 4444  
Honolulu, Hawaii 96812

Dear Ms. Young:

Subject: Primary Corridor Transportation Project

This is in response to your comments on the MIS/DEIS. We are responding to your testimony at the October 19, 2000 Special Transportation Committee Meeting regarding the MIS/DEIS:

1. *I do support the concept of the Bus Rapid Transit alternative. I think that measures must be taken to increase the people-carrying capacity of our roads and the Bus Rapid Transit can accomplish this without any new taxes or user fees.*

Response: Comment noted. It states a preference for a Locally Preferred Alternative (LPA).

2. *Furthermore, I do support the afternoon zipper lane as well as the extension of the morning zipper lane.*

Response: Comment noted.

We appreciate your interest in the project.

Sincerely,

CHERYL D. SOON  
Director

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**Final Environmental**

**Impact Statement**

Submittal Pursuant to  
Chapter 343, Hawaii Revised Statutes

**Primary Corridor Transportation Project**

City and County of Honolulu  
Department of Transportation Services

NOVEMBER 2002