Written Comments on the Preliminary Draft Plan
January 16, 2003

Mr. Vincent Llorin
Bicycle and Pedestrian Coordinator
Hawaii Department of Transportation
601 Kamokila Boulevard, Room 602
Kapolei, Hawaii 96707

Dear Mr. Llorin:

Subject: Update of Bike Plan Hawaii

The Department of Facility Maintenance does not have any comments at this time.

If you have any questions, please call Laverne Higa at 692-5111.

Very truly yours,

[Signature]

Larry J. Leopardi
Director and Chief Engineer
January 30, 2003

Mr. Vincent Llorin
Bicycle and Pedestrian Coordinator
Hawai‘i Department of Transportation
601 Kamokila Boulevard, Room 602
Kapolei, Hawai‘i 96707

Dear Mr. Llorin:

Re: Bike Plan Hawai‘i Update

Thank you for the opportunity to review and comment on the subject document. We support the State of Hawai‘i Master Plan for Biking and its purpose to integrate bicycling into the State’s transportation system.

Please call Lauren Tanaka, State Parks Planner at 7-0293 should you have questions.

Very truly yours,

Daniel S. Quinn, Administrator
Vincent Llorin  
Bicycle and Pedestrian Coordinator  
Hawaii Department of Transportation  
601 Kamakila Boulevard, Room 602  
Kapolei, Hawaii 96707

RE: Update of Bike Plan Hawaii

Thank you for the opportunity to review the subject plan. Overall it is an excellent plan update. The only correction I have to offer is for Page 5-2, that the Health Heritage Trail extends from Anahola to Lihue.

Should you require additional information, please call me at 241-6650.

Sincerely,

Douglas Haigh  
Chief, Building Division

cc: DCE
Mr. Douglas Haigh, Chief  
Building Division  
Department of Public Works  
County of Kauai  
4444 Rice Street, Suite 275  
Lihue, Kauai, Hawaii  96766

Dear Mr. Haigh:

Subject:  Update of Bike Plan Hawaii

Thank you for reviewing the Preliminary Draft of Bike Plan Hawaii.

We appreciate your favorable assessment of the plan, and have corrected the description of the Health Heritage Trail.

Please note that the Draft Plan will be distributed for public review in May, and we will be sending you a copy at that time.

If you have any questions, please contact Vincent Llorin, Bicycle and Pedestrian Coordinator, at (808) 692-7675.

Very truly yours,

GLENN M. YASUI.  
Administrator  
Highways Division

VL:ss
From: Vincent.Llorin@hawaii.gov
Sent: Monday, February 03, 2003 9:50 AM
Subject: Bike Plan Hawaii - comments on the agency review draft

Nancy,

Attached are comments from our FHWA's local Divisional Office...

Vince

----- Forwarded by Vincent Llorin/HWY/HIDOT on 02/03/2003 09:47 AM -----

"Jon Young"
<Jon.Young@igate.fhwa.dot.gov>
02/03/2003 09:34 AM

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Hi Vince,

Here are my comments so far:

1. Per what I mentioned on the phone, the intro to Ch 5 comes off as a summary of existing conditions based on research into existing plan documents, input, knowledge, etc. If these are really the PROPOSED objectives for each island, the intro really must be a lot stronger to get that point across and make a lasting impression!

2. Section 8.4.5 re the Safe Communities Program seems out of place to me but maybe to the reader it will not be. The reason it seems out of place is that it is a small NHTSA program in the midst of all of the larger FHWA programs being discussed. I would move it to outside of the FHWA discussion. Also it is a program for determining solutions, more of a study or planning effort, while the FHWA ones are mainly for implementation/construction of projects.

3. Section 8.4.7 implies that 10% of CMAQ funds goes to the TE program. This is not true. 10% of STP only must go to TE projects. Also, there is NOT an ANNUAL Spring call for TE projects. Please verify with Doug Meiler - the call is more on an as-needed basis at the current time although we would like it to be more frequent.

4. The Bike Plan Hawaii is part of the statewide transportation plan, which from the fed
perspective does not have to be financially constrained. In other words you don't have to show how the plan can be implemented WITHIN reasonably available funds. Some states voluntarily choose to constrain the plans to reasonably available funding to make the plan more realistic and implementable. This new plan still rings of a dream plan without funding, but I know that having everyone's project in it makes it more appealing to more people. I guess I would opt for being more realistic by recognizing and estimating limited funding, and prioritizing projects to fit that funding. But that is just an opinion since the fed rules don't require the statewide plan (and its elements such as the bike plan) to be financially constrained.

So there you have my comments for now. If I get any comments from others in the office by your deadline, I will forward them to you. Thanks. Jon
Vince,

Here are additional comments from Richelle Suzuki on the agency draft "Bike Plan Hawaii":

1. Page 1-3 halfway down - Replace "TEA-21" with "23 USC Section 217 also requires that..."

2. In second bullet of that paragraph, the quote is not correct. Please quote exactly what 23 USC Section 217 says. Here is what I get off the web at http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=browse_usc&docid=Cite:

23USC217 "(e) Bridges.--In any case where a highway bridge deck being replaced or rehabilitated with Federal financial participation is located on a highway on which bicycles are permitted to operate at each end of such bridge, and the Secretary determines that the safe accommodation of bicycles can be provided at reasonable cost as part of such replacement or rehabilitation, then such bridge shall be so replaced or rehabilitated as to provide such safe accommodations."

3. Page 1-3, two-thirds down the page - "In effect...to protect existing bicycle routes from disturbance." Disturbance is left to the reader's imagination. Reword to make clear what DOT means.

4. Page 1-4 first paragraph, last sentence - this sentence draws a conclusion that the plan's outcome have equitable distribution of good and bad effects, which is not quite what BJ says. Might be better to reword or quote the three principles of BJ; "To avoid..., To ensure..., and To prevent..." I am sure you have that in your BJ materials. If not, let me know.
5. Page 1-4 under Hawaii State Transportation Plan, second sentence - refers to the "theme" of Mobility and Accessibility. Just to be consistent, don't introduce that new term, Mobility and Accessibility is a GOAL, Goal 1.

6. Page 2-6 last sentence - "In limited cases...these dimensions are not met." Does HDOT go along with making this statement? The bike route will not meet AASHTO policies if this is allowed.

7. Page 5-7 second paragraph, "Unfortunately, sidepaths are...in lieu of..." This wording implies it is undesireable or bad to do so. Is this what HDOT really intends to say?

8. Section 7.3.1 "If a loop detector..." - Are we placing loop detectors specifically for bike lanes or did the bike lane just happen to coincide with the existing loop detector?

9. Page 7-19 Figure 7-6 - perhaps the max slope (2%) of the pavement cross slope should be indicated.

10. Page 8-4 Section 8.4.3 - perhaps should indicate what HI got for STP in most recent year. Do same for CMAQ in Section 8.4.6.

11. Page 8-4 Section 8.4.4 Hazard Elimination Safety Program, second to last sentence - it assumes that bicycle improvements are enhancements, but an improvement could be a hazard elimination if accidents are occuring in a certain location.

12. Page 8-5 Section 8.4.7 first sentence - replace "flexible FHWA funds, 10% is specifically earmarked" with "STF funds, 10% is set-aside" because only the STP category is subject to the 10% set-aside. An earmark is another fiscal term relating to Congress " earmarking" funds for specific individual projects. Also, the TE funds are closer to $3M, not $4M if the STP bucket is closer to $30M. In next paragraph, replace "eligible TE's" with "eligible TE activities" or "eligible for TE funding".

13. Page 8-6 first paragraph - Is $51.3M the total of the set-aside for all those years, or is it funds that were obligated, or something else? Clarify what the amount pertains to.

14. Page 8-9 third paragraph - note that refuge roads are eligible under this funding source, 23 USC Section 204.

15. Page 8-11 top sentence - remove "[.]

16. App B first page, assumptions at bottom - cannot ignore stream crossings, retaining or fill conditions, and cannot ignore Engineering, ROW, Legal, etc in the cost estimates. These costs can be significant and affect the priority ranking of a project.

17. App E - What is the basis of the cost estimates? Many of the projects have estimates that are too low, which may cause false expectations from the public and politicians when projects are implemented for much higher costs. Also, need to consider ROW cost which can raise the cost and possibly affect the priority ranking. $100 accuracy in a plan is too fine, not appropriate. Go to something gosser.

18. App E Big Island listing, page 10f 8 - Project 10 for Mohouli Street is likely substantially low because ROW is probable and will drive cost way up, and affect priority ranking possibly. There are blanks for Proj 12b for Nowelo Street that should be filled in.

Vince, as I said, these are from Richelle. If there are questions on these comments, I can take a stab at it, but you or the consultant might have to ask Richelle.

Thanks again for the opportunity to comment! Jon
MAY 15 2003

Mr. Abraham Y. Wong
Division Administrator
Federal Highway Administration
U.S. Department of Transportation
Box 50206
Honolulu, Hawaii 96850

Attention: Mr. Jonathan Young
Ms. Richelle Suzuki

Dear Mr. Wong:

Subject: Update of Bike Plan Hawaii

Thank you for reviewing the Preliminary Draft of Bike Plan Hawaii. Your comments helped us to rethink what we wanted to accomplish in the plan and to address its shortcomings. I am writing to let you know what actions were taken with respect to your concerns and suggestions.

Comments from Jonathan Young by e-mail dated February 3, 2003:

1. The intro to Chapter 5 comes off as a summary of existing conditions based on research into existing plan documents, input, knowledge, etc. If these are really the proposed objectives for each island, the intro really must be a lot stronger to get that point across and make a lasting impression.

We added a paragraph to the introductory material in Chapter 5 to reinforce the rather remarkable finding that community plans and land-use related policies at all levels of government in Hawaii are supportive of alternative modes of transportation in general, and bicycling in particular. Many of these documents specifically link improvement in quality of life with residents’ ability to have meaningful transportation choices. We agree that this is an important point and one that should be conveyed more compellingly.

2. Section 8.4.5 re. the Safe Communities Program seems to be out of place to me. The reason it seems out of place is that it is a small NHTSA program in the midst of all of the larger FHWA programs being discussed. I would move it outside the FHWA discussion. Also, it is a program for determining solutions, more of a study or planning effort, while the FHWA ones are mainly for implementation/construction of projects.
In light of the incongruities you pointed out, we moved the discussion on the Safe Communities Program. It now comes after Recreational Trails Fund (the last of the FHWA funding programs) and before Federal—Non-Transportation Funds.

3. Section 8.4.7 implies that 10% of CMAQ fund goes to the TE program. This is not true. 10% of STP only must go to TE projects. Also, there is not an annual Spring call for TE projects.

The text has been clarified so that TE funding is associated with STP and not CMAQ funds. Further, the document states that a call for TE projects is issued periodically.

4. Bike Plan Hawaii is part of the statewide transportation plan, which from the fed perspective does not have to be financially constrained. In other words, you don’t have to show how the plan can be implemented within reasonably available funds. Some states voluntarily choose to constrain the plans to reasonably available funding to make the plan more realistic and implementable. This new plan still rings of a dream plan without funding, but I know that having everyone’s project in it makes it more appealing to more people. I guess I would opt for being more realistic by recognizing and estimating limited funding and prioritizing project to fit that funding. But that is just an opinion since the fed rules don’t require the statewide plan (and its elements such as the bike plan) to be financially constrained.

There was considerable discussion about whether to prepare a plan that is financially constrained. Ultimately, a majority of users favored a plan that would show the “big picture” or what we’re working toward. The scale of this endeavor clearly exceeds the life of this plan. Even bicycle advocacy groups are aware that desired projects outnumber funding dollars; hence they have scrutinized the near-term projects to make sure those projects indeed merit top priority. Funding constraints will impose discipline on the project list through the STIP/TIP process.

Comments from Richelle Suzuki by e-mail dated February 13, 2003:

1-15. All copyediting suggestions that corrected errors or improved the clarity of the text were incorporated. We appreciate the careful reading given to the document.

16. Appendix B first page, assumptions at bottom – cannot ignore stream crossings, retaining or fill conditions, and cannot ignore Engineering, ROW, Legal, etc. in the cost estimates. These costs can be significant and affect the priority ranking of a project.

Ideally, all relevant cost items would be considered in developing cost estimates; however, with more than 400 proposed facilities, such an undertaking would overwhelm the planning process. More in-depth engineering analysis is needed to calculate earthwork costs or to determine ROW acquisition needs. Because such project-specific analysis cannot be conducted at this stage, we explicitly state that the cost estimates are for conceptual-level planning.
The evaluation process used to determine priority rankings considered costs, but also recognized other important factors, such as user needs and preferences, system connectivity and linkages, and safety. Therefore, while higher actual costs may affect how quickly projects are brought on line—the rate at which projects are implemented—we believe the priority levels of the projects themselves are well-founded.

17. Appendix E – What is the basis of the cost estimates? Many of the projects have estimates that are too low, which may cause false expectations from the public and politicians when projects are implemented for much higher costs. Also, need to consider ROW cost which can raise the cost and possibly affect the priority ranking. $100 accuracy in a plan is too fine, not appropriate. Go to something grosser.

Some of the estimates may be considered too low because the estimates may not have taken into account the cost of right-of-way acquisition which is beyond the scope for this statewide planning document. The estimates are pre-scoping estimates that need to be fine-tuned when the project is scoped. While some project estimates are likely to be too low, we should also note that others are probably higher than they need to be. All projects were assumed to be constructed as independent projects, but we know that it is far more economical to piggyback bicycle facilities on roadway projects, whether it is new construction or resurfacing and repair. Over time many bicycle facilities will probably be built this way and, under these conditions, the bicycle facility itself would not have to bear the full cost of design and construction.

Because of the many project-specific contingencies, we adopted a standardized approach to cost estimation. What it offers are the benefits of transparency and equal treatment of the proposals.

We did adopt the recommendation to loosen the cost estimates and now show all dollar values rounded to the nearest thousand.

18. Appendix E – Big Island listing, page 1 of 8 – Project 10 for Mohouli Street is likely substantially low because ROW is probable and will drive cost way up, and affect priority ranking possibly. There are blanks for Project 12b for Nowelo Street that should be filled in.

Mohouli Street presents a situation where information is readily available about conditions in the project environment. The same cannot be said for all proposals. To include anticipated special costs for some projects, and not have comparable costs for all others, may penalize certain projects. In the case of Nowelo Street, additional information will be provided as we receive specifics on the proposed alignment.