Transportation Management Area Planning Certification Review

Oahu MPO Transportation Management Area

FINAL February 2023 Summary Report

Photo credit: Honolulu Complete Streets
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1.0 EXECUTIVE SUMMARY

On July 11-14, 2022, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) conducted the certification review of the transportation planning process for the Oahu Metropolitan Planning Organization (OahuMPO) urbanized area. FHWA and FTA are required to jointly review and evaluate the transportation planning process for each urbanized area over 200,000 in population at least every four years to determine if the process meets the Federal planning requirements.

1.1 Previous Findings and Disposition

The most recent certification review for the OahuMPO urbanized area was conducted in 2018. The previous Certification Review findings and their disposition are provided in Appendix B.

1.2 Summary of Current Findings

The current review found that the metropolitan transportation planning process conducted in the OahuMPO area substantially meets, with corrective actions, the Federal planning requirements.

As a result of this review, FHWA and FTA certify the transportation planning process conducted by the Hawaii Department of Transportation (HDOT), Oahu Metropolitan Planning Organization (OahuMPO) and the City and County of Honolulu Department of Transportation Services (DTS) subject to the resolution of noted corrective actions. There are also recommendations in this report that warrant close attention and follow-up, as well as areas that OahuMPO is performing very well in that are to be commended.

A summary of the key review findings is provided on the following pages.
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<tr>
<td>MPO Structure and Agreements 23 U.S.C. 134(d) 23 CFR 450.314(a)</td>
<td>Several of OahuMPO’s agreements should be updated to reflect population changes and Federal legislative updates. The “Hawaii Planning Funds Distribution Formula to the MPO’s” was developed in 2016 and reflects FAST Act funding levels and 2010 Census information. OahuMPO’s Financial Supplemental Agreement, in which the non-federal share of OahuMPO’s budget is identified, and also reflects this 2016 funding agreement.</td>
<td><strong>Recommendations:</strong> 1. With the passage of the Bipartisan Infrastructure Law (BIL), OahuMPO should review and, if necessary, update its existing agreements (listed in Section 3.2) to ensure they reflect anticipated planning funding levels and statutory/regulatory references; in addition, the agreements should reflect the fiscal processes of the OahuMPO. 2. OahuMPO Policy Board and the Executive Director should assess OahuMPO staffing levels and capacity to ensure that OahuMPO reflects the skills and capacity needed to fulfill the federally required tasks for a TMA of its size.</td>
<td>Ideally, incorporate recommendations by the time of the next TMA Certification Review (June 2026).</td>
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<td>Unified Planning Work Program 23 CFR 450.308</td>
<td>The OahuMPO administers a one-year OWP that for FY2023 programmed approximately $3.0M in planning activities. The OahuMPO funds a variety of projects and studies within the OWP, including required regional planning elements such as the MTP, TIP, CMP, and Public Involvement. Past practice among OahuMPO, the HDOT, and FHWA/FTA have allowed</td>
<td><strong>Corrective Actions:</strong> 1. The OahuMPO should consider whether the OWP will include one or two budget periods, as allowed by Federal regulations. This flexibility to program up to two years of regional planning activities may support greater flexibility for project selection processes and may extend the OWPs period of performance. Therefore, the OahuMPO must coordinate with HDOT’s Statewide Transportation Planning office and Highways-Staff Services Branch to establish a</td>
<td>Address all corrective actions by the time the next OWP budget period starts (July 2023).</td>
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### Review Area

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| the obligation of funds for a multi-year period of performance, usually up to four years. As a result, OahuMPO currently has multiple active work programs and $2.8M of unexpended, obligated FHWA funding against an annual expected obligation authority of $1.8M. Planning tasks and studies appear to have been programmed and obligated before they are ready-to-go; for example, several local studies were de-funded due to changes in priority in the most recent OWP cycle after being awarded funding in previous OWP cycles; and some planning tasks show no expenditures despite being programmed and obligated for several years. | Period of Performance for the OWP that appropriately reflects the Budget Period,\(^1\) the time needed for MPO closeout activities, and the time needed for HDOT closeout activities. 2. The OWP shall:  
  a. Only describe tasks and work to be performed during the OWP budget period;  
  b. Only request reimbursement for expenditures that occur in the same year(s) as the OWP budget period;  
  c. Close out the OWP by the end of the performance period; and  
  d. Issue an accomplishments report within 90 days of the last budget year end of the performance period. 3. The OahuMPO must update its OWP Policies and Procedures to clearly identify the roles and responsibilities of the TAC, CAC, and Policy Board in the development of the OWP. The process must engage the Policy Board earlier in the development of the OWP to support Policy Board input on regional priorities to ensure that any |        |

\(^1\) 2 CFR 200.1 "Budget period" means the time interval from the start date of a funded portion of an award to the end date of that funded portion during which recipients are authorized to expend the funds awarded, including any funds carried forward or other revisions pursuant to § 200.308
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<td>Metropolitan Transportation Plan</td>
<td>The OahuMPO’s ORTP was last updated in April 2021. The OahuMPO is currently beginning work on the next update, due no later than April 2026. The 2021 ORTP update is not fully compliant with federal requirements: • The ORTP does not clearly consider or incorporate the funded studies reflect the MPO’s regional transportation goals and policies; that OahuMPO staff work is directed appropriately; and that only work for planning tasks that are “ready to go” are identified during the period of performance of the OWP. This process should be reflected in the MPOs agreements, Policies and Procedures documents, and Public Participation Plan, as applicable. OahuMPO should document the process for programming and obligating FHWA and FTA planning funding, including roles and responsibilities for staff at the MPO and HDOT.</td>
<td>Resolve all corrective actions by the next update of the ORTP (no later than April 2026). Ideally, incorporate recommendations by the next update of the ORTP.</td>
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4. The OahuMPO must document a transition plan to close out existing, non-compliant planning projects.
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<td>performance-based planning efforts required under 23CFR450.306, including the Congestion Management Process (CMP).</td>
<td>financial plan must also demonstrate how the projects included in the plan are fiscally constrained.</td>
<td><strong>Recommendations:</strong></td>
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<td>• The financial forecast and funding tables show a large overage.</td>
<td></td>
<td>1. The OahuMPO should identify a process by which it can analyze transportation forecasting, including tradeoffs among its goals and objectives, and among multimodal transportation options, in the generation and evaluation of its funded program and project list. This analysis should be completed and provided to the OahuMPO Policy Board as part of the ORTP development and evaluation prior to public review of the final ORTP.</td>
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<td>It is unclear how the MPO’s goals and performance measures guided the generation, selection, and prioritization of the projects list in the plan and how the proposed plan is in line with transportation system trends.</td>
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<td>2. The OahuMPO should develop a realistic schedule for the next ORTP update that includes checkpoints and processes by which planning partners formally approve data and analyses.</td>
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<td>OahuMPO’s planning partners described a process of plan development that did not allow for technical analyses and assumptions to be fully vetted before being integrated into the plan.</td>
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<td>Transportation Improvement Program 23 U.S.C. 134(c)(h)&amp; (j) 23 CFR 450.326</td>
<td>The OahuMPO TIP was last updated in July 2021; the STIP was approved in November 2021. The OahuMPO TIP is a four-year TIP with two illustrative years. The OahuMPO updates its TIP every three years and amends or modifies the TIP several times per year. As the TIP has been revised, it is not clear whether it remains consistent with the ORTP. In addition, it is not clear how the OahuMPO has integrated the performance-based planning processes into the selection and prioritization of projects in the TIP. Finally, the TIP’s fiscal summary tables are confusing, showing negative funding amounts in certain years. The Advance Construction discussion is also not clear.</td>
<td><strong>Corrective Actions:</strong> 1. As the TIP is revised or modified, the ORTP must be amended to ensure consistency between the two documents is maintained, to reflect new projects, removed projects, and changes that impact the ORTP’s fiscal constraint. 2. During the next update to the OahuMPO TIP, the OahuMPO must clarify and document how the CMP and other required performance-based plans, processes, and programs were considered and implemented.</td>
<td>Resolve corrective actions by the next Hawaii STIP update (November 2024). Ideally, incorporate recommendations into the next Hawaii STIP update (November 2024).</td>
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| Public Participation        | The OahuMPO updated its Public Participation Plan (PPP) in March 2022. The MPO effectively uses their website to advertise public involvement opportunities and to publish the disposition of public comments received during the planning processes. For its MTP update and TIP updates and revisions, the MPO routinely documents comments received from the public and from government agencies, provides a response, and makes the disposition of comments available on its website. However, some information on the website is outdated and the organization of the information can make it difficult to find the right document. Consistent with procedures described in its PPP, the OahuMPO created a separate Public Involvement Plan for its MTP update. Throughout its MTP update, the OahuMPO evaluated its public involvement efforts for each phase. | **Commendations:**  
1. The OahuMPO’s dispositions of comments for its MTP and TIP are exemplary.  
2. The OahuMPO’s outreach during its MTP update was extensive and inclusive, and included many diverse opportunities for the public to participate.  
**Recommendations:**  
1. The OahuMPO should ensure that its website clearly identifies the latest version of its required agreements and documents. Outdated or redundant documents should be removed or marked “superseded,” and outdated links should be revised.  
2. Manage CAC and the general public expectations in the decision-making process.  
3. OahuMPO staff should review the USDOT’s Promising Practices for Meaningful Public Involvement in Transportation Decision-Making. | Ideally, incorporate recommendations by the next TMA Certification Review (June 2026). |
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<td>of outreach and implemented improvements for subsequent phases. MPO staff has actively engaged the CAC in the decision-making process and have brought comments and recommendations made by the CAC to the Policy Board. However, CAC members and the general public expressed frustration that they do not know how their comments are used in the decision-making process. The OahuMPO currently maintains both a <em>Public Participation Plan</em> and <em>Public Participation Plan Development Procedures</em>. Some of the material in the documents is redundant; other information is contradictory.</td>
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| Civil Rights (Title VI, EJ, LEP, ADA) | In the ORTP and the TIP, the OahuMPO has undertaken basic analysis of majority-minority areas in relation to anticipated project locations. However, the OahuMPO has not fully identified the benefits and burdens of transportation investments to the minority and disadvantaged and low-income populations. It is difficult to make meaningful conclusions from the Title VI/Environmental Justice analysis. Throughout its ORTP update, the OahuMPO routinely evaluated its own efforts to reach out to minority and underserved populations, making changes to outreach efforts when their self-evaluation efforts indicated it was necessary. | **Commendation:**  
The OahuMPO has made a focused effort to engage disadvantaged populations in the planning processes.  

**Recommendations:**  
During the next updates to the ORTP and the TIP, OahuMPO should undertake a more robust analysis of the benefits, and impacts, of the transportation system projects and services on minority and low-income populations, to provide more meaningful understanding of the impact of TIP investment. | Ideally, incorporate recommendations into the next ORTP and Hawaii STIP updates (April 2026 and November 2024). |
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<td>Travel Demand Forecasting 23 CFR 450.324(f)(1)</td>
<td>The OahuMPO develops and operates the Travel Demand Forecasting Model (TDFM), a tour-based regional planning model to forecast travel demand for a 20-year horizon encompassing the entire island of Oahu.</td>
<td><strong>Corrective Actions:</strong>&lt;br&gt;1. The OahuMPO TDFM must use the most recent available current and verifiable estimates for population, employment, travel, and land use data. In addition, the MPO must coordinate data among partner agencies to adequately estimate current and future travel demand.&lt;br&gt;2. The OahuMPO must integrate travel demand forecasting into the development of the ORTP decisionmaking processes&lt;br&gt;&lt;br&gt;<strong>Recommendations:</strong>&lt;br&gt;1. The OahuMPO should develop the technical capacity to support and administer the TDFM development and management processes&lt;br&gt;2. OahuMPO should develop a flowchart and schedule that shows integration of its modeling efforts into the CMP and ORTP updates.</td>
<td>Resolve corrective actions by the next ORTP update (April 2026). Ideally, incorporate recommendations into the next ORTP update (April 2026).</td>
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<td>Congestion Management Process / Management and Operations 23 U.S.C. 134(k)(3) 23 CFR 450.322</td>
<td>The OahuMPO has made progress on developing its CMP since the 2018 TMA Certification Review and provided an updated “State of Congestion” report in 2020. However, the review team was unable to verify whether or how the long list of congestion management strategies is considered or applied in the MPO’s planning processes. The CMP does not appear to evaluate the performance of previously identified projects and actions. However, by updating its TDFM and funding microsimulation, OahuMPO may be better positioned to complete its CMP.</td>
<td><strong>Commendation:</strong> The MPO’s Congestion Management Process Dashboard presents the 2020 CMP information in a dynamic format and examines existing congestion conditions for different areas of Oahu, providing insight into how congestion differs across the island. <strong>Corrective Action:</strong> The OahuMPO’s CMP must analyze and identify the underlying causes of recurring and non-recurring congestion, identify and evaluate alternative strategies, provide information supporting the implementation of actions, and evaluate the effectiveness of implemented actions. <strong>Recommendation:</strong> The OahuMPO should define and document a process for integrating microsimulation modeling efforts performed by the City and County of Honolulu, ridership and station access modeling performed by HART, and statewide travel demand modeling performed by HDOT into its congestion management process to analyze the impact of transportation system management approaches as well as to analyze the impact of proposed policy recommendations on recommended projects.</td>
<td>The OahuMPO must demonstrate incorporation of its CMP into its next TIP update (due November 2024) and ORTP update (due April 2026). Ideally, the OahuMPO will incorporate recommendations into its next TIP update and ORTP update.</td>
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Details of the certification findings for each of the above items are contained in this report.
2.0 INTRODUCTION

2.1 Background

Pursuant to 23 U.S.C. 134(k) and 49 U.S.C. 5303(k), the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) must jointly certify the metropolitan transportation planning process in Transportation Management Areas (TMAs) at least every four years. A TMA is an urbanized area, as defined by the U.S. Census Bureau, with a population of over 200,000.

In general, the reviews consist of three primary activities: a site visit, a review of planning products (in advance of and during the site visit), and preparation of a Certification Review Report that summarizes the review and offers findings. The reviews focus on compliance with Federal regulations, challenges, successes, and experiences of the cooperative relationship between the MPO(s), the State DOT(s), and public transportation operator(s) in the conduct of the metropolitan transportation planning process.

The Certification Review process is only one of several methods used to assess the quality of a regional metropolitan transportation planning process, compliance with applicable statutes and regulations, and the level and type of technical assistance needed to enhance the effectiveness of the planning process. Other activities provide opportunities for this type of review and comment, including Unified Planning Work Program (UPWP) approval, the Metropolitan Transportation Plan, Metropolitan and Statewide Transportation Improvement Program (TIP/STIP) findings, as well as a range of other formal and less formal contact provide both FHWA/FTA an opportunity to comment on the planning process. The results of these other processes are considered in the Certification Review process.

While the Certification Review report itself may not fully document those many intermediate and ongoing checkpoints, the “findings” of Certification Review are, in fact, based upon the cumulative findings of the entire review effort.

The review process is individually tailored to focus on topics of significance in each metropolitan planning area. Federal reviewers prepare Certification Reports to document the results of the review process. The reports and final actions are the joint responsibility of the appropriate FHWA and FTA field offices, and their content will vary to reflect the planning process reviewed, whether or not they relate explicitly to formal “findings” of the review.

2.2 Purpose and Objective

Since the enactment of the Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991, the FHWA and FTA are required to jointly review and evaluate the transportation planning process in all urbanized areas over 200,000 population to determine if the process meets the Federal planning requirements in 23 U.S.C. 134, 40 U.S.C. 5303, and 23 CFR 450. The Safe, Accountable,
Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), extended the minimum allowable frequency of certification reviews to at least every four years.

The OahuMPO (OahuMPO) is the designated MPO for the Honolulu and Kailua-Kaneohe urbanized areas. The Hawaii Department of Transportation (HDOT) is the responsible State agency and the City and County of Honolulu Department of Transportation Services (DTS) is the responsible public transportation operator. Current membership of OahuMPO’s Policy Board consists of elected officials from the City and County of Honolulu, which is Oahu’s sole municipality; elected officials from the State of Hawaii who represent state legislative districts on Oahu; and department heads from state and county transportation and land use agencies.

Certification of the planning process is a prerequisite to the approval of Federal funding for transportation projects in such areas. The certification review is also an opportunity to provide assistance on new programs and to enhance the ability of the metropolitan transportation planning process to provide decision makers with the knowledge they need to make well-informed capital and operating investment decisions.

3.0 SCOPE AND METHODOLOGY

3.1 Review Process

Participants in the 2022 review included representatives of FHWA, FTA, HDOT, DTS, the Honolulu Authority for Rapid Transportation (HART) rail project, and OahuMPO staff. A full list of participants is included in Appendix A.

The certification review covers the transportation planning process conducted cooperatively by the MPO, State, and public transportation operators. A desk audit of current documents and correspondence was completed prior to the site visit. In addition to the formal review, routine oversight mechanisms provide a major source of information upon which to base the certification findings. Background information, current status, key findings, and recommendations are summarized in the body of the report for the following subject areas selected by FHWA and FTA staff for on-site review:

- MPO Structure and Agreements
- Unified Planning Work Program
- Metropolitan Transportation Plan (MTP)
- Transportation Improvement Program (TIP)
- Public Participation
- Civil Rights (Title VI, EJ, LEP, ADA)
- Travel Demand Forecasting
- Congestion Management Process
3.2 Documents Reviewed

The following MPO documents were evaluated as part of this planning process review:

- Findings and disposition of the previous (2018) Certification Review for the OahuMPO urbanized area (See Appendix B).
- MPO Agreements:
  - Performance-Based Planning and Programming: Implementation Policies and Procedures (September 2021)
- OahuMPO Overall Work Program Fiscal Year 2023 (https://www.oahumpo.org/?wpfb_dl=2651)
- 2045 Oahu Regional Transportation Plan (https://www.oahumpo.org/?wpfb_dl=2215), including technical papers and appendices located on the ORTP webpage (https://www.oahumpo.org/plans-and-programs/oahu-regional-transportation-plan-ortp/)
- OahuMPO Transportation Improvement Program FFYs 2022-2025, updated July 2021 (https://www.oahumpo.org/?wpfb_dl=2415)
- Title VI and Environmental Justice Analysis for FFYs 2022-2025 TIP (https://www.oahumpo.org/?wpfb_dl=2350)

• Travel Demand Forecasting:
  o Final Model Refresh Report, updated July 2013
  o Intel AI Kit and XGBoost for Predictive Modeling
  o Oahu Household Survey Final Report, updated February 2013
  o Tour-Based Travel Model Estimation: for Oahu Metropolitan Planning Organization (working version), updated June 2013
  o User’s Guide For The OahuMPO Planning Model In TransCAD 6.0, updated June 2013

4.0 PROGRAM REVIEW

FHWA applies a risk-based approach to the TMA Certification Review, with a focus on the items that appear to be most at risk for compliance. The following topics are found to be in compliance and are not reviewed further.

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<th>Statutory/Regulatory Requirement</th>
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<td>Metropolitan Planning Area Boundaries 23 U.S.C. 134(e) 23 CFR 450.312(a)</td>
<td>The OahuMPO boundaries encompass the island of Oahu, Hawaii. The population of the region was 1,016,508 in the 2020 census.</td>
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<td>Transit Planning 49 U.S.C. 5303 23 U.S.C. 134 23 CFR 450.314</td>
<td>OahuMPO, DTS, and HART coordinate transit planning and programming for the metropolitan planning area. Through its UPWP, OahuMPO is funded several transit planning studies, including the 2019 Transit Rider Survey Project, the Multi-modal Transit Asset Management Plan, and several transit plaza alternatives analyses associated with Oahu’s rail transit project.</td>
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<td>Consultation and Coordination 23 U.S.C. 134(g) &amp; (i)(5)-(6) and 23 CFR 450.316(b-e) 23 CFR 450.324(g)(1-2) 23 CFR 450.324(f)(10)</td>
<td>The OahuMPO documented its outreach process to transportation service providers, state and local planning agencies, and Federal land management agencies in its most recent MTP and TIP updates.</td>
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<td>Freight 23 U.S.C. 134(h) 23 CFR 450.306</td>
<td>The HDOT and OahuMPO coordinate on freight planning activities.</td>
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<td>Transportation Safety</td>
<td>The HDOT and OahuMPO coordinate on transportation safety linkages. OahuMPO has established safety targets for its planning area. OahuMPO is funding DTS’s <em>Vision Zero Action Plan</em>.</td>
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<td>Transportation Security Planning and Resilience</td>
<td>The island of Oahu has recently encountered several catastrophic environmental issues, including flooding and landslides, and Oahu residents and leaders are concerned about sea-level rise and resiliency of the transportation system. Through its UPWP, OahuMPO is funding the State Department of Land and Natural Resources’ <em>Planning for Improved Resilience to Coastal Hazards through Green Infrastructure</em> study. In the past, the OahuMPO has funded emergency evacuation planning studies and infrastructure resiliency studies.</td>
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<tr>
<td>Nonmotorized Planning/Livability</td>
<td>Through its UPWP, OahuMPO has funded several studies related to non-motorized transportation, including the DTS’s <em>Active Transportation Monitoring Data</em> program. OahuMPO has established a competitive process for the suballocated portion of the Transportation Alternatives Set-Aside program and selects non-motorized projects accordingly.</td>
</tr>
<tr>
<td>Integration of Land Use and Transportation</td>
<td>OahuMPO works closely with land planning agencies on Oahu and incorporates land use information in its travel demand forecasting model.</td>
</tr>
</tbody>
</table>

### 4.2 MPO Structure and Agreements

#### 4.2.1 Regulatory Basis

23 U.S.C. 134(d) and 23 CFR 450.314(a) state that the MPO, the State, and the public transportation operator shall cooperatively determine their mutual responsibilities in carrying out the metropolitan transportation planning process. These responsibilities shall be clearly...
identified in written agreements among the MPO, the State, and the public transportation operator serving the MPA.

### 4.2.2 Current Status

OahuMPO was founded on December 3, 1975. It was re-designated on June 17, 2015. The member jurisdictions include the State of Hawaii and the City and County of Honolulu. The transit agencies include DTS and the Honolulu Area Rapid Transit (HART). DTS operates Oahu’s bus transit service. HART is constructing Oahu’s rail transit project; DTS will operate the rail transit service once it is operational.

- **MPO Official Name:** Oahu Metropolitan Planning Organization
- **Year Founded:** 1975 & redesignated in 2015
- **Policy Board Members:** Agency officials and elected leaders from State of Hawaii and the City and County of Honolulu
- **Major Transit Operator:** City and County of Honolulu

The “Hawaii Planning Funds Distribution Formula to the MPO’s” was developed in 2016 and reflects FAST Act funding levels and 2010 Census information. OahuMPO’s Financial Supplemental Agreement, in which the non-federal share of OahuMPO’s budget is identified, and also reflects this 2016 funding agreement.

### 4.2.3 Findings

Discussions with OahuMPO staff and partners revealed a great deal of optimism about the state of Oahu MPO’s leadership and staff. The partnership with the City and County of Honolulu is visibly strong, and staff technical capacity has noticeably improved since the 2018 TMA Certification Review. OahuMPO staff, Policy Board members, and several partners expressed the desire and interest to expand the role and visibility of OahuMPO.

At the same time, continued MPO staff turnover has resulted in a staff that is fairly new to MPO requirements and unfamiliar with best MPO practices. Policy Board members expressed concerns about MPO staff’s technical capabilities and ability to meet Federal requirements and deadlines based in large part on issues encountered during the latest update of OahuMPO’s Metropolitan Transportation Plan (MTP). Partner agencies also expressed concern about the capacity of OahuMPO to develop planning documents and processes in a well-coordinated and cooperative manner that ensures adequate time for technical review and discussion.

**Recommendations:**

1. With the passage of the Bipartisan Infrastructure Law (BIL), OahuMPO should review and, if necessary, update its existing agreements (listed in Section 3.2) to ensure they reflect anticipated planning funding levels and statutory/regulatory references; in addition, the agreements should reflect the fiscal processes of the OahuMPO.

2. OahuMPO Policy Board and the Executive Director should assess OahuMPO staffing levels and capacity to ensure that OahuMPO reflects the skills and capacity needed to fulfill the
federally required tasks for a TMA of its size. Specific training opportunities in the following areas are recommended:

- Understanding the Federal-Aid funding programs
- Directing consultants and managing contracts
- Leveraging partnerships
- Travel demand forecasting and analytics of data in the planning process, especially for the Congestion Management Process and Travel Demand Forecasting.

**Schedule for Process Improvement:**
Ideally, incorporate recommendations by the time of the next TMA Certification Review (June 2026).

**Proposed FHWA/FTA Technical Assistance:**
The Transportation Planning Capacity Building (TPCB) Program offers the Transportation Planning Process Briefing Book that provides an overview of transportation planning for government officials, transportation decisionmakers, planning board members, transportation service providers, interested stakeholders, and the public. The Briefing Book specifically identifies the role of the MPO in the planning process.

Through its TPCB Peer Program, FHWA can organize a peer exchange with one or more MPOs to strengthen the roles of and build capacity for the OahuMPO Policy Board, OahuMPO staff, and staff at partner agencies. Opportunities for the Peer Program include:

- Policy Board Peer Exchange: to grow the role of the Policy Board as a decision-making body that sets long-term policy for transportation throughout the region and programs projects through the transportation improvement program to ensure regional transportation goals are realized.

- Technical Advisory Committee (TAC) Peer Exchange: to exchange ideas about leveraging technical expertise of OahuMPO’s TAC members throughout plan and program development, growing the TAC as an extension of technical staff, in addition to its role as advisor to the Policy Board at specific decision points.

### 4.3 Unified Planning Work Program

#### 4.3.1 Regulatory Basis

23 CFR 450.308 sets the requirement that planning activities performed under Titles 23 and 49 U.S.C. be documented in a Unified Planning Work Program (UPWP). The MPO, in cooperation with the State and public transportation operator, shall develop a UPWP that includes a discussion of the planning priorities facing the metropolitan planning area and the work
proposed for the next one- or two-year period by major activity and task. The UPWP describes the tasks in sufficient detail to indicate the agency that will perform the work, the schedule for completing the work, the resulting products, the proposed funding, and sources of funds. (At OahuMPO, the UPWP is referred to as the Overall Work Program, or OWP.)

4.3.2 Current Status

The OahuMPO administers a one-year OWP. The FY2023 OWP programmed approximately $3.0M in planning activities. The OahuMPO funds a variety of projects and studies within the OWP, including required regional planning elements such as the MTP, TIP, CMP, and Public Involvement. The OahuMPO works closely with its TAC, Citizens Advisory Committee (CAC), and potential subrecipients to solicit input to the OWP, including issuing a “Call for Projects” for planning study ideas. The OWP programs planning tasks for a variety of timeframes, that reach beyond the one-year period of performance for the annual OWP, including annual OahuMPO staff time to three/four-year consultant or sub-recipient tasks and studies performed by partner agencies.

4.3.3 Findings

While the OahuMPO works closely with its TAC, CAC, and potential subrecipients to solicit input on the OWP, the OWP development and approval process engages the Policy Board only after a draft is prepared and ready for public input. Historically, there is little discussion or debate at the Policy Board about the planning projects included in the OWP prior to Board approval. Without Policy Board input and direction, studies and tasks funded in the OWP may not reflect current regional planning priorities.

Past practice among OahuMPO, the HDOT, and FHWA/FTA have allowed the obligation of funds for a multi-year period of performance, usually up to four years. As a result, OahuMPO currently has multiple active work programs and $2.8M of unexpended, obligated FHWA funding against an annual expected obligation authority of $1.8M. Planning tasks and studies appear to have been programmed and obligated before they are ready-to-go; for example, several local studies were de-funded due to changes in priority in the most recent OWP cycle after being awarded funding in previous OWP cycles; and some planning tasks show no expenditures despite being programmed and obligated for several years.

While the state of Hawaii has an outstanding balance of Federal metropolitan planning funding associated with specific OWP projects, the OahuMPO is limited in annual obligation authority, which limits the amount of Federal funds available for OahuMPO’s one-year OWP. The OahuMPO can only program their OWP up to their annual obligation authority limit. If additional obligation authority is available, HDOT may grant OahuMPO additional funds to support more “ready-to-go” planning tasks in their OWP.

Corrective Actions:

1. The OahuMPO should consider whether the OWP will include one or two budget periods, as allowed by Federal regulations. This flexibility to program up to two years of regional planning activities may support greater flexibility for project selection processes
and may extend the OWPs period of performance. Therefore, the OahuMPO must coordinate with HDOT’s Statewide Transportation Planning office and Highways-Staff Services Branch to establish a Period of Performance for the OWP that appropriately reflects the Budget Period, the time needed for MPO closeout activities, and the time needed for HDOT closeout activities.

2. The OWP shall:
   a. Only describe tasks and work to be performed during the OWP budget period;
   b. Only request reimbursement for expenditures that occur in the same year(s) as the OWP budget period;
   c. Close out the OWP by the end of the performance period; and
   d. Issue an accomplishments report within 90 days of the last budget year end of the performance period.

3. The OahuMPO must update its OWP Policies and Procedures to clearly identify the roles and responsibilities of the TAC, CAC, and Policy Board in the development of the OWP. The process must engage the Policy Board earlier in the development of the OWP to support Policy Board input on regional priorities to ensure that any funded studies reflect the MPO’s regional transportation goals and policies; that OahuMPO staff work is directed appropriately; and that only work for planning tasks that are “ready to go” are identified during the period of performance of the OWP. This process should be reflected in the MPOs agreements, Policies and Procedures documents, and Public Participation Plan, as applicable. OahuMPO should document the process for programming and obligating FHWA and FTA planning funding, including roles and responsibilities for staff at the MPO and HDOT.

4. The OahuMPO must document a transition plan to close out existing, non-compliant planning projects.

**Schedule for Process Improvement:**

The OahuMPO must address all corrective actions by the time the next OWP budget period starts (July 2023).

**Proposed FHWA/FTA Technical Assistance:**

Staff from the FHWA Hawaii Division office and FTA Region 9 will work closely with OahuMPO staff to transition to a compliant OWP process.

OahuMPO staff involved in planning grant administration should take the following NHI courses:

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2 CFR 200.1 “Budget period” means the time interval from the start date of a funded portion of an award to the end date of that funded portion during which recipients are authorized to expend the funds awarded, including any funds carried forward or other revisions pursuant to § 200.308
Web-based

- FHWA Planning and Research Grants: History, Sources, and Regulations (FHWA-NHI-151046)
- FHWA Planning and Research Grants: Program Administration (23 CFR Part 420) (FHWA-NHI-151057)
- FHWA Planning and Research Grants: The Uniform Guidance (2 CFR Part 200) - Part 1 (FHWA-NHI-151058)
- FHWA Planning and Research Grants: The Uniform Guidance (2 CFR Part 200) - Part 2 (FHWA-NHI-151509)

In-person

- Administration of FHWA Planning and Research Grants (FHWA-NHI-151021)

4.4 Metropolitan Transportation Plan

4.4.1 Regulatory Basis

23 U.S.C. 134(c), (h) & (i) and 23 CFR 450.324 set forth requirements for the development and content of the Metropolitan Transportation Plan (MTP), on Oahu referred to as the Oahu Regional Transportation Plan, or ORTP. Among the requirements are that the ORTP address at least a 20-year planning horizon and that it includes both long- and short-range strategies that lead to the development of an integrated and multi-modal system to facilitate the safe and efficient movement of people and goods in addressing current and future transportation demand.

23 CFR 450.324(c) requires the OahuMPO to review and update the ORTP at least every 5 years in attainment areas “to confirm the transportation plan's validity and consistency with current and forecasted transportation and land use conditions and trends.” Further, 23 CFR 450.324(e) requires that “[i]n updating the transportation plan, the MPO shall base the update on the latest available estimates and assumptions for population, land use, travel, employment, congestion, and economic activity.”

23 CFR 450.306 requires the OahuMPO to consider, coordinate, or integrate several state, regional, and local transportation planning efforts in the metropolitan transportation planning process, as part of a performance-based program. The list of required planning efforts includes the following:

- Asset management: the state Transportation Asset Management Plan and the Transit Asset Management Plan
- Safety: Applicable portions of the Highway Safety Improvement Program, including the Strategic Highway Safety Plan, and the Public Transportation Agency Safety Plan
- The State Freight Plan
- The congestion management process
- ITS Architecture
• the Coordinated Public Transit-Human Services Transportation Plan

The Bipartisan Infrastructure Law (BIL) added requirements to consider additional planning efforts in the metropolitan transportation planning process, such as the National Electric Vehicle Infrastructure (NEVI) plan, the Vulnerable Road User Assessment, housing and employment location, bicycle and pedestrian planning, carbon reduction, and resilience planning.

4.4.2 Current Status

The OahuMPO’s ORTP was last updated in April 2021. The ORTP identifies a vision and goals for the Oahu region’s long-range transportation. The goals included safety, active transportation, equity, resiliency, preservation/maintenance, reliability/efficiency, and protection of environmental and cultural assets. The ORTP describes existing demographic conditions in detail, as well as challenges to the existing transportation system. The ORTP provides a list of projects and programs and a discussion of fiscal constraint.

The OahuMPO is currently beginning work on the next update, due no later than April 2026.

4.4.3 Findings

The 2021 ORTP update is not fully compliant with federal requirements:

• The current MTP does not clearly consider or incorporate the performance-based planning efforts required under 23CFR450.306, including the CMP. The current MTP references the CMP in describing existing conditions and future travel time forecasts for planned investments but does not appear to implement the CMP in proposing, developing, or analyzing projects for the long-range plan.

• The financial forecast and funding tables show a large overage ($5 billion over the 20-year plan).

In addition, it is unclear how the MPO’s goals and performance measures guided the generation, selection, and prioritization of the projects list in the plan and how the proposed plan is in line with transportation system trends.

OahuMPO’s planning partners described a process of plan development that did not allow for technical analyses and assumptions to be fully vetted before being integrated into the plan.

Corrective Actions:

1. The 2026 ORTP must clarify and document how the CMP and other required performance-based plans, processes, and programs were considered and implemented through the long-range plan development.

2. The OahuMPO, HDOT, and local planning partners must develop a financial plan with realistic assumptions about the availability of anticipated and proposed funding resources. The financial plan must also demonstrate how the projects included in the plan are fiscally constrained.
**Recommendations:**

1. The OahuMPO should identify a process by which it can analyze transportation forecasting, including tradeoffs among its goals and objectives, and among multimodal transportation options, in the generation and evaluation of its funded program and project list. This analysis should be completed and provided to the OahuMPO Policy Board as part of the ORTP development and evaluation prior to public review of the final ORTP.

2. The OahuMPO should develop a realistic schedule for the next ORTP update that includes checkpoints and processes by which planning partners formally approve data and analyses.

**Schedule for Process Improvement:**

By the next update of the ORTP (no later than April 2026), the OahuMPO must resolve all corrective actions (including documenting how the CMP and other performance-based plans were incorporated in long-range plan development) and must have a realistic fiscal constraint analysis. Failure to address corrective actions may result in non-approval of TIP updates and amendments for the island of Oahu. Ideally, the OahuMPO should incorporate recommendations by the next update of the ORTP.

**Proposed FHWA/FTA Technical Assistance:**

The FHWA and FTA are available to participate in ORTP working group meetings to provide technical assistance throughout the development of the ORTP.

Through the FHWA’s **Peer Program**, FHWA/FTA may arrange a peer exchange with an MPO in the same stage of planning its MTP as OahuMPO. The peer exchange may include how to integrate the Congestion Management Process into the ORTP.

OahuMPO staff involved in development of the ORTP may want to consider taking the following NHI course:

- **Investment Decision Making and Transportation Performance Management (TPM)**  
  (FHWA-NHI-138025 (web-based))

**4.6 Transportation Improvement Program**

**4.6.1 Regulatory Basis**

23 U.S.C. 134(c),(h) & (j) set forth requirements for the MPO to cooperatively develop a Transportation Improvement Program (TIP). Under 23 CFR 450.326, the TIP must meet the following requirements:

- Cover at least a four-year horizon and be updated at least every four years.
- List surface transportation projects funded under Title 23 U.S.C. or Title 49 U.S.C., except as noted in the regulations.
• List project description, cost, funding source, and identification of the agency responsible for carrying out each project.
• Be consistent with the adopted MTP.
• Be fiscally constrained.
• Provide all interested parties with a reasonable opportunity to comment on the proposed TIP.

4.6.2 Current Status
The OahuMPO TIP was last updated in July 2021; the STIP was approved in November 2021. The OahuMPO TIP is a four-year TIP with two illustrative years. The OahuMPO updates its TIP every three years and amends or modifies the TIP several times per year. The TIP Policies and Procedures allow for three types of revisions: Amendments, Expedited Modifications, and Pre-Approved Modifications.

4.6.3 Findings
As the TIP has been revised, it is not clear whether it remains consistent with the ORTP. For example, TIP project titles or descriptions may not map clearly to ORTP project/program descriptions; the TIP may add or remove projects from the first four years of the ORTP; or the TIP project may show a different project schedule or project cost estimate, both of which may impact ORTP fiscal constraint. (Examples of projects added in TIP Revision #3 that are not found on the ORTP project list include “Interstate Route H-3, H-3 Finish, Unit VIIC;” and “High Friction Surface Treatment Installation at Various Locations on Oahu.”)

It is not clear how the OahuMPO has integrated the performance-based planning processes required under 23 CFR 450.306, including the CMP, as part of the selection and prioritization of projects in the TIP.

Finally, the TIP’s fiscal summary tables are confusing, showing negative funding amounts in certain years. The Advance Construction discussion is also not clear.

Corrective Action:
1. During the next update to the OahuMPO TIP, the OahuMPO must clarify and document how the CMP and other required performance-based plans, processes, and programs were considered and implemented.
2. As the TIP is revised or modified, the ORTP must be amended to ensure consistency between the two documented is maintained to reflect new projects, removed projects, and changes that impact the ORTP’s fiscal constraint.

Recommendations:
1. The OahuMPO should clearly show how the TIP meets fiscal constraint requirements.
2. As the state of Hawaii pursues Advance Construction as a fiscal strategy, the OahuMPO should work with the HDOT to develop a method for clearly describing Advance Construction and its association with fiscal constraint in the TIP.
Schedule for Process Improvement:
The OahuMPO must resolve corrective actions by the next Hawaii STIP update (November 2024). Ideally, the OahuMPO should incorporate recommendations into the next Hawaii STIP update (November 2024).

Proposed FHWA/FTA Technical Assistance:
FHWA can provide examples of how states and MPOs show Advance Construction and other innovative financing in their STIPs and TIPs.

4.7 Public Participation

4.7.1 Regulatory Basis
Sections 134(i)(5), 134(j)(1)(B) of Title 23 and Section 5303(i)(5) and 5303(j)(1)(B) of Title 49, require MPOs to provide adequate opportunity for the public to participate in and comment on the products and planning processes of the MPO. The requirements for public involvement are detailed in 23 CFR 450.316(a) and (b), which require the MPO to develop and use a documented participation plan that includes explicit procedures and strategies to include the public and other interested parties in the transportation planning process.

Specific requirements include giving adequate and timely notice of opportunities to participate in or comment on transportation issues and processes, employing visualization techniques to describe metropolitan transportation plans and TIPs, making public information readily available in electronically accessible formats and means such as the world wide web, holding public meetings at convenient and accessible locations and times, demonstrating explicit consideration and response to public input, and a periodically reviewing of the effectiveness of the participation plan.

4.7.2 Current Status
The OahuMPO updated its Public Participation Plan (PPP) in March 2022. In the PPP, the OahuMPO identifies how the public can generally get involved in OahuMPO planning efforts, as well as specific public involvement activities associated with major planning documents (such as the ORTP, the TIP, and the OWP). The OahuMPO’s Public Participation Plan Development Procedures was approved by the Policy Board in 2015.

4.7.3 Findings
The MPO effectively uses their website to advertise public involvement opportunities and to publish the disposition of public comments received during the planning processes. For its MTP update and TIP updates and revisions, the MPO routinely documents comments received from the public and from government agencies, provides a response, and makes the disposition of comments available on its website. However, some information on the website is outdated and the organization of the information can make it difficult to find the right document.

Consistent with procedures described in its PPP, the OahuMPO created a separate Public Involvement Plan for its MTP update. Throughout its MTP update, the OahuMPO evaluated its
public involvement efforts for each phase of outreach and implemented improvements for subsequent phases.

MPO staff has actively engaged the CAC in the decision-making process and have brought comments and recommendations made by the CAC to the Policy Board. However, CAC project recommendations generally do not get included in the ORTP, TIP or OWP. During the TMA Certification Review, CAC members and the general public expressed frustration that they do not know how their comments are used in the decision-making process.

The OahuMPO currently maintains both a Public Participation Plan and Public Participation Plan Development Procedures. Some of the material in the documents is redundant; other information is contradictory.

**Commendations:**

1. The OahuMPO’s dispositions of comments for its MTP and TIP are exemplary.

2. The OahuMPO’s outreach during its MTP update was extensive and inclusive, and included many diverse opportunities for the public to participate.

**Recommendations:**

1. The OahuMPO should ensure that its website clearly identifies the latest version of its required agreements and documents. Outdated or redundant documents should be removed or marked “superseded,” and outdated links should be revised.

2. Manage CAC and the general public expectations in the decision-making process:
   a. The MPO should clarify in the CAC bylaws and in the PPP when in the decision-making process the CAC and the general public will be invited to provide comments, any parameters by which the CAC and/or the general public should focus its comments, and how CAC and general public comments will be considered in the decision-making processes.
   b. All OahuMPO documented planning processes (OWP, ORTP, TIP) should clearly define how the CAC and the general public will be involved, the parameters of involvement, and how any comments received will be considered by Policy Board.

3. OahuMPO staff should review the USDOT’s [Promising Practices for Meaningful Public Involvement in Transportation Decision-Making](#)

**Schedule for Process Improvement:**

Ideally, the OahuMPO should incorporate recommendations by the next TMA Certification Review (June 2026).

4.8 **Civil Rights (Title VI, EJ, LEP, ADA)**

4.8.1 **Regulatory Basis**

Title VI of the Civil Rights Act of 1964, prohibits discrimination based upon race, color, and national origin. Specifically, 42 U.S.C. 2000d states that “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the
benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” In addition to Title VI, there are other Nondiscrimination statutes that afford legal protection. These statutes include the following: Section 162 (a) of the Federal-Aid Highway Act of 1973 (23 U.S.C. 324), Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973/Americans with Disabilities Act (ADA) of 1990. ADA specifies that programs and activities funded with Federal dollars are prohibited from discrimination based on disability.

Executive Order #12898 (Environmental Justice) directs federal agencies to develop strategies to address disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations. In compliance with this Executive Order, USDOT and FHWA issued orders to establish policies and procedures for addressing environmental justice in minority and low-income populations. The planning regulations, at 23 CFR 450.316(a)(1)(vii), require that the needs of those “traditionally underserved” by existing transportation systems, such as low-income and/or minority households, be sought out and considered.

Executive Order # 13166 (Limited-English-Proficiency) requires agencies to ensure that limited English proficiency persons are able to meaningfully access the services provided consistent with and without unduly burdening the fundamental mission of each federal agency.

4.8.2 Current Status

The OahuMPO has undertaken basic analysis of majority-minority areas in relation to anticipated project locations. However, the OahuMPO has not fully identified the benefits and burdens of transportation investments to the minority and disadvantaged and low-income populations.

In its TIP, the OahuMPO’s Title VI/Environmental Justice analysis looks at the distribution of investment (i.e., TIP spending in the form of projects). It is difficult to make meaningful conclusions from the Title VI/Environmental Justice analysis.

Throughout its ORTP update, the OahuMPO routinely evaluated its own efforts to reach out to minority and underserved populations, making changes to outreach efforts when their self-evaluation efforts indicated it was necessary.

4.8.3 Findings

Commendation:

The OahuMPO has made a focused effort to engage disadvantaged populations in the planning processes.

Recommendations:

During the next updates to the ORTP and the TIP, OahuMPO should undertake a more robust analysis of the benefits and impacts of transportation system projects and services on minority and low-income populations. An alternative approach to the Title VI/Environmental Justice
analysis in the TIP could quantitatively examine transportation system outcomes (mobility, safety, reliability, or infrastructure conditions, etc.) and whether those outcomes vary based on mode and/or environmental justice categories. The analysis for each program or performance area could compare conditions with and without the TIP. This would provide more meaningful understanding of the impact of TIP investment.

**Schedule for Process Improvement:**
Ideally, the OahuMPO should incorporate recommendations into the next ORTP and Hawaii STIP updates (April 2026 and November 2024).

**4.17 Travel Demand Forecasting**

**4.17.1 Regulatory Basis**
23 CFR 450.324(f)(1) requires that the Metropolitan Transportation Plan include the projected transportation demand of persons and goods in the Metropolitan Planning Area over the period of the transportation plan. Travel demand forecasting models are one type of method used in the planning process to identify deficiencies in future year transportation systems and evaluate the impacts of alternative transportation investments. 23 CFR 450.324(e) requires the MPO to base its transportation plan update on the latest available estimates and assumptions for population, land use, travel, employment, congestion, and economic activity, and to approve transportation plan contents and supporting analyses produced by a transportation plan update.

**4.17.2 Current Status**
The OahuMPO develops and operates the Travel Demand Forecasting Model (TDFM), a tour-based regional planning model to forecast travel demand for a 20-year horizon encompassing the entire island of Oahu. The OahuMPO uses consultant services to develop and manage the TDFM. OahuMPO staff work closely with the consultant to administer the TDFM and support data inputs. In its current configuration, OahuMPO’s regional planning model is generally most useful for analyzing highway capacity projects.

The TDFM is also utilized by OahuMPO’s partner agencies to support rail transit forecasting, bus transit demand forecasting, and development impact studies. OahuMPO provides partner agencies access to the model via an online GitHub development platform. Using the GitHub platform, partner agencies can also request modifications or data updates to the TDFM.

The TDFM’s is based on data from the 2012 National Household Travel Survey. Current and forecasted land use data is prepared by the City and County of Honolulu’s Department of Planning and Permitting (DPP) for use in the TDFM.

OahuMPO is currently funding a variety of tasks related to its overall modeling efforts. For the TDFM, these include purchasing travel survey data to update the base year and origin-destination data; correcting the highway network data and building an all-street network;
integrating the land use data from DPP; and improving the interface so that it is more user-friendly. OahuMPO is also funding the development of microsimulation/operational modeling, the collection of active transportation data, and the collection of on-board transit surveys. Some of these activities will contribute directly to the update of the TDFM.

4.17.3 Findings

The current TDFM does not use the most recent planning data, including population, employment, travel, and land use data. Each partner agency indicated that while the model is used as a basis for their own forecasting, many of the data inputs require updating prior to using it for transportation planning purposes. As a result, each agency administers a slightly different model version based on their own data inputs and analysis. Partner agencies stated specifically that they had to correct land use data in their efforts to use the model.

Through discussions with partner agencies and MPO staff, it appears that the MPO lacks the technical capacity necessary to oversee the consultant developing and managing the TDFM. During the development of the current ORTP, timing of the model development and the adoption of the ORTP did not allow planning partners time to review the data used, modeling outputs, or to confirm the resulting analyses. In addition, the Policy Board adoption of the ORTP did not consider current or forecasted transportation demand considerations normally integrated into the long-range planning processes.

As a highway capacity model, the OahuMPO’s TDFM may not provide full analytical support for the vision, goals, and objectives that the OahuMPO has outlined in its ORTP. However, the modeling tasks that OahuMPO is currently funding may lead to a set of modeling capabilities better able to support the vision and goals that OahuMPO establishes in its ORTP.

The OahuMPO relies on the GitHub platform to consider data updates and analysis from partner agencies. Partner agencies noted a lack of communication and coordination from MPO staff when GitHub submissions are made. As a result, partner agencies are not confident about how the model is managed by MPO staff via the GitHub platform, thereby limiting their willingness to accept OahuMPO’s TDFM as a consistent regional tool.

Corrective Actions:

1. The OahuMPO TDFM must use the most recent available current and verifiable estimates for population, employment, travel, and land use data. In addition, the MPO must coordinate data among partner agencies to adequately estimate current and future travel demand.

2. The OahuMPO must integrate travel demand forecasting into the development of the MTP decisionmaking processes. This requires the MPO to consider the inputs and results of the forecasting processes prior to project development and selection. It also requires analysis of potential scenarios and their impacts on existing and future transportation systems.
**Recommendations:**

1. The OahuMPO should develop the technical capacity to support and administer the TDFM development and management processes. To ensure regionwide support, the MPO should define and document a process for coordinating and ensuring consistency of TDFM data, outputs and analysis among partner agencies. This includes efforts by the MPO to administer the TDFM as well as efforts by partner agencies to apply the MPO’s TDFM for their own transportation planning processes and updating the model and modeling inputs in the process.

2. OahuMPO should develop a flowchart and schedule that shows integration of its modeling efforts into the CMP and MTP updates. In addition, the OahuMPO should define and document how its TDFM is used to analyze the impact of proposed policy recommendations on proposed highway capacity projects.

**Schedule for Process Improvement:**

The OahuMPO must resolve corrective actions by the next ORTP update (April 2026). Ideally, the OahuMPO should incorporate recommendations into the next ORTP update (April 2026).

**Proposed FHWA/FTA Technical Assistance:**

FHWA is available to arrange a peer review and/or technical review for the TDFM update.

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**4.19 Congestion Management Process / Management and Operations**

**4.19.1 Regulatory Basis**

23 U.S.C. 134(k)(3) and 23 CFR 450.322 set forth requirements for the congestion management process (CMP) in TMAs. The CMP is a systematic approach for managing congestion through a process that provides for a safe and effective integrated management and operation of the multimodal transportation system.

23 CFR 450.324(f)(5) requires the MTP to include Management and Operations (M&O) of the transportation network as an integrated, multimodal approach to optimize the performance of the existing transportation infrastructure. Effective M&O strategies include measurable regional operations goals and objectives and specific performance measures to optimize system performance.

**4.19.2 Current Status**

The OahuMPO has made progress on developing its CMP since the 2018 TMA Certification Review, and provided an updated “State of Congestion” report in 2020. The 2020 CMP Report and CMP Dashboard explained the requirements for a CMP, explained how the CMP was developed, listed the goals, objectives, and performance measures, defined the CMP network, described existing congestion, and presented a long list of potential congestion management strategies. No analysis of the strategies was developed or presented.
4.19.3 Findings

The review team was unable to verify either through document reviews or interviews with MPO staff whether or how the long list of congestion management strategies is considered or applied in the MPO’s planning processes. While the 2020 CMP documentation states that CMP can be used to evaluate and select MTP and TIP projects, and the 2022-2025 TIP presents an analysis of how the selected program of projects perform to reduce congestion, it does not appear to compare different strategies against each other for selection. The TIP is not clear in showing how selected projects were shown to be the best option for congestion management versus other strategies. The CMP does not appear to evaluate the performance of previously identified projects and actions. However, by updating its TDFM and funding microsimulation, OahuMPO may be better positioned to complete its CMP than in the past.

Commendation:
The MPO’s Congestion Management Process Dashboard presents the 2020 CMP information in a dynamic format and examines existing congestion conditions for different areas of Oahu, providing insight into how congestion differs across the island.

Corrective Action:
The OahuMPO’s CMP must analyze and identify the underlying causes of recurring and non-recurring congestion, identify and evaluate alternative strategies, provide information supporting the implementation of actions, and evaluate the effectiveness of implemented actions.

Recommendation:
The OahuMPO should define and document a process for integrating microsimulation modeling efforts performed by the City and County of Honolulu, ridership and station access modeling performed by HART, and statewide travel demand modeling performed by HDOT into its congestion management process to analyze the impact of transportation system management approaches as well as to analyze the impact of proposed policy recommendations on recommended projects.

Schedule for Process Improvement:
The OahuMPO must demonstrate incorporation of its CMP into its next TIP update (due November 2024) and MTP update (due April 2026).

Proposed FHWA/FTA Technical Assistance:
FHWA’s Congestion Management Process Guidebook highlights the role of the CMP in addressing multiple objectives, including livability, multimodal transportation, and demand management and operations strategies.

FHWA and OahuMPO can work together to identify training for OahuMPO staff responsible for the CMP, or peer exchange/peer review opportunities.
5.0 CONCLUSION AND RECOMMENDATIONS

The FHWA and FTA review found that the metropolitan transportation planning process conducted in the OahuMPO planning area substantially meets, with corrective actions, the Federal planning requirements.

As a result of this review, FHWA and FTA certify the transportation planning process conducted by the Hawaii Department of Transportation (HDOT), Oahu Metropolitan Planning Organization (OahuMPO) and the City and County of Honolulu Department of Transportation Services (DTS), subject to the resolution of noted corrective actions.

5.1 Corrective Actions

The following are corrective actions that the OahuMPO must take to comply with Federal Regulations:

1. With the passage of the Bipartisan Infrastructure Law (BIL), OahuMPO must update its existing agreements to ensure they reflect anticipated planning funding levels and statutory/regulatory references and that the financial support (i.e., the non-federal share) provided by partners reflects the fiscal processes of the OahuMPO.

2. The MPO shall: determine whether they will develop a one- or two-year OWP; only describe tasks and work to be performed during that time period; only request reimbursement for work identified in the current work program during the time of that work program; close out that work program at the end of the performance period; and issue an accomplishments report within 90 days of the end of the performance period.

3. The OahuMPO must update its OWP Policies and Procedures to clearly identify the roles and responsibilities of the TAC, CAC, and Policy Board in the development of the OWP. The process must engage the Policy Board earlier in the development of the OWP.

4. The 2026 ORTP must clarify and document how the CMP and other required performance-based plans, processes, and programs were considered and implemented through the long-range plan development.

5. The OahuMPO, HDOT, and local planning partners must develop a financial plan with realistic assumptions about the availability of anticipated and proposed funding resources. The financial plan must also demonstrate how the projects included in the plan are fiscally constrained.

6. During the next update to the OahuMPO TIP, the OahuMPO must clarify and document how the CMP and other required performance-based plans, processes, and programs were considered and implemented.
7. As the TIP is revised or modified, the ORTP must be amended as needed to reflect new projects, removed projects, and changes that impact the ORTP’s fiscal constraint. The triggers for ORTP amendment and administrative modification processes must reflect Federal requirements and must be documented in the approved TIP.

8. The OahuMPO TDFM must use the most recent available current and verifiable estimates for population, employment, travel, and land use data. In addition, the MPO must coordinate data among partner agencies to adequately estimate current and future travel demand.

9. The OahuMPO must integrate travel demand forecasting into the development of the MTP decision making processes.

10. The OahuMPO’s CMP must analyze and identify the underlying causes of recurring and non-recurring congestion, identify and evaluate alternative strategies, provide information supporting the implementation of actions, and evaluate the effectiveness of implemented actions.

5.2 Commendations
The following are noteworthy practices that the OahuMPO is doing well in the transportation planning process:

1. The OahuMPO’s dispositions of comments for its MTP and TIP are exemplary.
2. The OahuMPO’s outreach during its MTP update was extensive and inclusive, and included many diverse opportunities for the public to participate.
3. The OahuMPO has made a focused effort to engage disadvantaged populations in the planning processes.
4. The MPO’s Congestion Management Process Dashboard presents the 2020 CMP information in a dynamic format and examines existing congestion conditions for different areas of Oahu, providing insight into how congestion differs across the island.

5.3 Recommendations
The following are recommendations that would improve the transportation planning process:

1. OahuMPO Policy Board and the Executive Director should assess OahuMPO staffing levels and capacity to ensure that OahuMPO reflects the skills and capacity needed to fulfill the federally required tasks for a TMA of its size.
2. OahuMPO’s Policy Board members could benefit from information-sharing with other MPO Policy Boards about their role in establishing regional transportation planning priorities and identifying and funding multimodal transportation systems.
3. The OahuMPO should consider whether the OWP will reflect a one-year or two-year period of performance, as allowed by Federal regulations.

4. The OahuMPO should identify a process by which it can analyze transportation forecasting, including tradeoffs among its goals and objectives, and among multimodal transportation options, in the generation and evaluation of its funded program and project list. This analysis should be completed and provided to the OahuMPO Policy Board as part of the ORTP development and evaluation prior to public review of the final ORTP.

5. The OahuMPO should develop a realistic schedule for the next ORTP update that includes checkpoints and processes by which planning partners formally approve data and analyses.

6. The OahuMPO should provide a clear explanation showing how the TIP meets fiscal constraint requirements.

7. As the state of Hawaii pursues Advance Construction as a fiscal strategy, the OahuMPO should work with the HDOT to develop a method for clearly showing Advance Construction and Advance Construction conversion plans in the TIP.

8. The OahuMPO should ensure that its website clearly identifies the latest version of its required agreements and documents. Outdated or redundant documents should be removed or marked “superseded,” and outdated links should be revised.

9. The OahuMPO should manage CAC and the general public expectations in the decision-making process.

10. During the next updates to the ORTP and the TIP, OahuMPO should undertake a more robust analysis of the benefits, and impacts, of the transportation system projects and services on minority and low-income populations.

11. The OahuMPO should develop the technical capacity to support and administer the TDFM development and management processes.

12. OahuMPO should develop a flowchart and schedule that shows integration of its modeling efforts into the CMP and MTP updates.

13. The OahuMPO should define and document a process for integrating microsimulation modeling efforts performed by the City and County of Honolulu, ridership and station access modeling performed by HART, and statewide travel demand modeling performed by HDOT into its congestion management process to analyze the impact of transportation system management approaches as well as to analyze the impact of proposed policy recommendations on recommended projects.
5.4 Training/Technical Assistance

The following training and technical assistance are recommended to assist the MPO with improvements to the transportation planning process:

- Review the *Transportation Planning Process Briefing Book* and the *Congestion Management Process Guidebook*
- Peer Review and/or Peer Exchange for Policy Board Peer Exchange, Technical Advisory Committee Peer Exchange, Travel Demand Forecast Modeling update
- Training on Grant Administration, Transportation Performance Management, Advance Construction, and Congestion Management Process
APPENDIX A - PARTICIPANTS

The following individuals were involved in the OahuMPO urbanized area on-site review:

- Federal Highway Administration (FHWA)
  - Amy Ford-Wagner, Hawaii Division
  - Richelle Takara, Hawaii Division
  - Michele O’Connell, Hawaii Division
  - Brenda Hernacki, Hawaii Division
  - Kelly Okumura, Hawaii Division
  - Wayne Kaneshiro, Hawaii Division
  - Theresa Hutchins, Office of Planning
  - Steven Call, Office of Planning

- Federal Transit Administration (FTA)
  - Ryan Fujii, Region 9

- OahuMPO
  - Councilmember Radiant Cordero, OahuMPO Policy Board Chair
  - Mark Garrity, Executive Director
  - Veronica Schack, Office Manager
  - Nicole Smith, Planning Manager
  - Joel Vincent, Accountant
  - Zakari Mumuni, Senior Planner
  - Samantha Lara, Transportation Planner
  - Dallas Ige, Assistant Transportation Planner
  - Lily Zheng, Intern

- Hawaii Department of Transportation (HDOT)
  - Ed Sniffen, Deputy Director of Highways & OahuMPO Policy Board member
  - Masatomo Murata, Statewide Transportation Planning & OahuMPO TAC Co-chair
  - Rachel Roper-Noonan, Highways Planning Branch

- City and County of Honolulu
  - Roger Morton, Director of Transportation Services
  - Chris Clark, Branch Chief, Transportation Planning Division
  - Yoko Tomita, Transportation Planner
  - Mark Au, Branch Chief, Federal Compliance

- Honolulu Area Rapid Transportation (HART)
  - Lori Kahikina, Executive Director & OahuMPO Policy Board Member
  - Joey Manahan, Government Affairs Liaison
  - Ryan Tam, Director of Planning & OahuMPO TAC Chair
## APPENDIX B - STATUS OF FINDINGS FROM LAST REVIEW

One of the priorities of each certification review is assessing how well the planning partners in the area have addressed corrective actions and recommendations from the previous certification review. This section identifies the corrective actions and recommendations from the previous certification and summarizes discussions of how they have been addressed.

<table>
<thead>
<tr>
<th>Review Area</th>
<th>Findings</th>
<th>Corrective Actions/ Recommendations</th>
<th>Disposition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unified Planning Work Program (UPWP) 23 CFR 450.308</td>
<td>The MPO is funding a wide variety of projects and studies within the UPWP, most of which are focused on local interests and planning needs. However, several MPO activities necessary to support requirements are not included in the UPWP including updates to the TIP, MTP, CMP, PPP, and other MPO planning products.</td>
<td><strong>Recommendation:</strong> Develop a project selection process to prioritize projects necessary and reasonable to support the MPO’s role and responsibilities for regional planning under 23 CFR 450.300.</td>
<td>Resolved. The MPO includes activities necessary to support regional planning requirements in its UPWP.</td>
</tr>
<tr>
<td>Metropolitan Transportation Plan (MTP) 23 U.S.C. 134(c),(h)&amp;(i) 23 CFR 450.324</td>
<td>The current update to the MTP/ORTP does not reference the congestion management process (CMP); did not fully demonstrate financial constraint; and provides a very limited evaluation of environmental justice (EJ) impacts. The plan also did not document the consultation with land management and resource agencies.</td>
<td><strong>Corrective Action:</strong> During the next update to the MTP, clarify and document how the updated or new CMP was implemented through the long-range plan development. The OahuMPO, HDOT, and local planning partners must develop a financial plan with realistic assumptions and demonstrate how the projects included in the plan are fiscally constrained. Additionally, the OahuMPO must maintain</td>
<td>These corrective actions and recommendations have either been resolved or have been refreshed to reflect the status as of the 2022 TMA Certification Review and are considered resolved.</td>
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</table>
a documented process for consultation for land management agencies.

**Unresolved Corrective Actions from 2014:**

- Consult with State and local agencies responsible for land management, natural resources, environmental protection, conservation and historic preservation concerning the development of the transportation plan.
- The ORTP must demonstrate and document implementation of the approved CMP.
- The Final ORTP must include a documented disposition of public comments received.
- The ORTP must include documentation of the analysis completed for EJ and Title VI.

**Unresolved Recommendations from 2014:**

The MPO should research how member agencies estimate project costs to better understand consistencies and inconsistencies between agencies and to improve cost estimation for the ORTP.
- The MPO should establish procedures to ensure cost estimates meet specific
| **Transportation Improvement Program**<br>23 U.S.C. 134(c)(h)&(j)<br>23 CFR 450.326 | The TIP is greatly improved over the prior (2014) TMA review. However, the TIP does not demonstrate how the CMP is implemented through the project prioritization and selection processes in the TIP. | **Corrective Action:** During the next update to the TIP, clarify and document the implementation of the updated or new CMP. | These corrective actions and recommendations have either been resolved or have been refreshed to reflect the status as of the 2022 TMA Certification Review and are considered resolved. |
| **Public Participation**<br>23 U.S.C. 134(i)(6)<br>23 CFR 450.316 & 450.326(b) | The Citizen Advisory Committee (CAC) is the primary focus of public involvement for all aspects of the MPO planning processes. In addition, the MPO effectively uses their website to advertise public involvement opportunities and to publish the disposition of public comments. | **Corrective Action:** During the next update to the TIP and MTP, OahuMPO must fully document public comments and the disposition of the comments received and identify, either within the public participation plan or within the final document(s), how the documented comments are addressed. | The Corrective Action has been resolved; the OahuMPO has prepared exemplary disposition of public comments. These recommendations have been refreshed to reflect the status as of the 2022 TMA Certification Review and are considered resolved. |
comments received during the planning processes. However, it’s unclear within the planning products where members of the public can access both the comments provided during public involvement processes and the MPO’s disposition of the comments received.

comments and responses are made available to the public.

Unresolved Recommendations from 2014:

Manage CAC expectations in the decision-making process:

- The MPO should clarify in the CAC bylaws and in the PPP when in the decision-making process the CAC will be invited to provide comments, any parameters by which the CAC should focus its comments, and how CAC comments will be considered in the TAC and Policy Committee decision-making processes.

- All OahuMPO documented planning processes (OWP, ORTP, TIP) should clearly define how the CAC will be involved, the parameters of its involvement, and how any comments received will be considered by the TAC and Policy [Board].

Certification Review and are considered resolved.

<table>
<thead>
<tr>
<th>Civil Rights Title VI Civil Rights Act, 23 U.S.C. 324, Age Discrimination Act, Sec. 504 Rehabilitation Act, Americans with Disabilities Act</th>
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<tbody>
<tr>
<td>The MPO has undertaken basic analysis of majority-minority areas in relation to anticipated project locations. However, the MPO has not fully identified the benefits and burdens of transportation investments to the minority and disadvantaged and low-income populations. In addition, while the public involvement processes include</td>
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<td>Recommendation: OahuMPO should evaluate how to obtain input from minority and disadvantaged communities into the planning process. The public participation plan should outline a strategy for greater involvement from the diverse communities of the Oahu metropolitan planning area into the development of the next update of the ORTP and TIP.</td>
</tr>
<tr>
<td>These corrective actions have been refreshed to reflect the status as of the 2022 TMA Certification Review and are considered resolved.</td>
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<tr>
<td>Section</td>
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<tr>
<td>Consultation and Coordination</td>
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<tr>
<td>Consultation and Coordination</td>
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<tr>
<td>Congestion Management Process / Management and Operations</td>
</tr>
<tr>
<td>Outstanding Recommendations from the 2014 Review</td>
</tr>
</tbody>
</table>
| OahuMPO administrative improvements | Recommendations:  
• Establish formal performance reviews and appraisals for the MPO Director and MPO staff to monitor and recognize technical capacity and administrative improvements, needs and successes.  
• The MPO Director should engage in focused training in leadership, management, public relations and working with the media in a public position.  
• A mentorship program for the MPO Director and MPO staff could help support and improve technical capacities and job satisfaction. | Resolved. The OahuMPO has performed annual performance reviews for the MPO Director and Staff. With a new Executive Director and new staff, the MPO should evaluate the need for additional training and mentoring; however, this recommendation will be considered resolved. |
| Develop Training Curriculum: | Recommendations:  
• Outline role and responsibility of the MPO for regional transportation planning and programming and the steps necessary to meet requirements;  
• The MPO decision-making structure and roles and responsibilities for decision-making; how components of the MPO and MPO products relate to the overall multi-modal transportation planning process;  
• How the MPO planning and programming decisions are carried out | These recommendations have been refreshed during the 2022 TMA Certification Review; these will be considered resolved. |
| Transportation Improvement Program | The TIP is greatly improved over the prior (2014) TMA review. However, the TIP does not demonstrate how the CMP is implemented through the project prioritization and selection processes in the TIP. | **Corrective Action:** During the next update to the TIP, clarify and document the implementation of the updated or new CMP. | These corrective actions have been updated during the 2022 TMA Certification Review and are considered resolved. |
| Transportation Improvement Program | 23 U.S.C. 134(c)(h) & (j) | 23 CFR 450.326 | Unresolved Corrective Actions from 2014: |
| | • The Final TIP must include a documented disposition of public comments received. | • The TIP must demonstrate and document implementation of the approved CMP. | • The TIP must include documentation of the analysis completed for EJ and Title VI. |
APPENDIX C – PUBLIC OUTREACH
OahuMPO
Transportation Management Area Certification Review
PRESENTATION TO OAHUMPO CITIZENS ADVISORY COMMITTEE
JULY 6, 2022
AMY FORD-WAGNER, FHWA HAWAII DIVISION
Pop Quiz!

What is a TMA?
1. Total Mickey (Mouse) Addiction
2. Transportation Maximization Affect
3. Transportation Management Area
4. Traffic Minimization Analysis
Pop Quiz!

Who conducts the TMA Certification Review?
1. President Biden & USDOT Secretary Buttigieg
2. HDOT Deputy Dir. Ed Sniffen
3. The CAC
4. FHWA & FTA staff
Pop Quiz!

- What do we look at in a TMA Certification Review?
  1. Required planning products meet regulations
  2. CAC attendance records
  3. The cooperative planning process as conducted by the State, public transportation operator, and local governments in the area.
  4. Previous Certification Review results
  5. The contents of the Executive Director’s desk drawer
Pop Quiz!

- True or False: TMA Certification is graded pass/fail.

FALSE!
Not really a grade -
We highlight good practices, exchange information, and identify opportunities for improvements.
What is a TMA Certification?

- TMA = Transportation Management Area
  - Urbanized area with population >200,000
- FHWA and FTA must jointly certify the metropolitan transportation planning process in Transportation Management Areas (TMAs) at least every four years.

(U.S.C. 134(k) and 49 U.S.C. 5303(k))
“The [2018] review found that the metropolitan transportation planning process conducted in the Oahu MPO area substantially meets, with corrective actions, the Federal planning requirements.”

- 2 Commendations
- ~7 Corrective Actions (+10 unresolved from 2014)
- ~3 Recommendations (+10 unresolved from 2014)
2022 Certification Team

Team Members:

- Theresa Hutchins, FHWA Headquarters
- Steven Call, FHWA Headquarters
- Amy Ford-Wagner, FHWA Hawaii Division
- Michele O’Connell, FHWA Hawaii Division
- Ryan Fujii, FTA Region IX
- Ted Matley, FTA Region IX
Review Process

- Review previous findings
- Desk review of required MPO documents
- Public Input
- Meet with MPO staff
- Meet with Policy Board and TAC members
- FHWA/FTA issue Draft Report
- Staff review Draft Report for factual accuracy
- Final Report/Certify the MPO
- Report back to TAC, CAC, Policy Board

**TMA Certification due September 23**
Public Input Opportunities

- Questionnaire circulated by OahuMPO
- Haleiwa Makers Market
- This meeting
- TAC meeting

& we will share the review with you!
Questionnaire Responses
Who Responded?

- 64 responses
- Mostly “resident” or unaffiliated, then OahuMPO board/committee members
- Still open, if you want to take it!
Over the past month, how often have you seen or sought out information regarding transportation planning on Oahu?
(Choose one.)
When you have questions about transportation on Oahu… (Select all that apply.)
Overall, I feel that I am well informed about transportation planning on Oahu.
Have you read or are you aware of the following documents? (Select all that apply.)

- MTP
- TIP
- OWP
- 2045 HSTP
- 2035 Statewide Plan
- Honolulu Complete Streets website
- None of the above
Overall, I am satisfied with the amount of transportation planning information I see.
### Barriers to engagement

<table>
<thead>
<tr>
<th>Barriers</th>
<th>Description</th>
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<tbody>
<tr>
<td>I feel my participation/feedback won’t make a difference</td>
<td></td>
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<tr>
<td>Not aware of how my comments or feedback are used</td>
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<tr>
<td>Awareness of opportunities to participate</td>
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<tr>
<td>Lack of time/too large of a commitment</td>
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<tr>
<td>No barriers or no engagement</td>
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<tr>
<td>Not understanding the value and/or experiencing the results of my feedback</td>
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<tr>
<td>Not understanding the impacts of transportation in my life and/or on my agency/industry</td>
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<tr>
<td>Not a priority for me and/or my agency</td>
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<tr>
<td>Location/accessibility of meetings/event</td>
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<tr>
<td>Subject matter/materials are too technical and/or complicated</td>
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<tr>
<td>Poor inte… acc…</td>
<td></td>
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</tbody>
</table>
Generally, I feel that my interests are well represented in the current transportation planning process.
How have you received information about transportation planning on Oahu?
What is your preferred source of information for transportation planning on Oahu?
Public Input Received

- What works well?
- What could be improved?
Next Steps

- Review previous findings
- Desk review of required MPO documents
- Public Input
- Meet with MPO staff
- Meet with Policy Board and TAC members
- FHWA/FTA issue Draft Report
- Staff review Draft Report for factual accuracy
- Final Report/Certify the MPO
- Report back to TAC, CAC, Policy Board

**TMA Certification due September 23**
Points of Contact

**FHWA Hawaii Division**
- **Amy Ford-Wagner, Community Planner**
- Michele O’Connell, Program Management Analyst
- Richelle Takara, Division Administrator

**FTA Region IX**
- **Ryan Fujii, General Engineer**

**Technical Assistance**
- Theresa Hutchins, FHWA Office of Planning
- Steven Call, FHWA Office of Planning
QUESTIONS?
APPENDIX D - LIST OF ACRONYMS

ADA: Americans with Disabilities Act
AMPO: Association of Metropolitan Planning Organizations
CAA: Clean Air Act
CFR: Code of Federal Regulations
CMP: Congestion Management Process
CO: Carbon Monoxide
DOT: Department of Transportation
EJ: Environmental Justice
FAST: Fixing America’s Surface Transportation Act
FHWA: Federal Highway Administration
FTA: Federal Transit Administration
FY: Fiscal Year
HSIP: Highway Safety Improvement Program
ITS: Intelligent Transportation Systems
LEP: Limited-English-Proficiency
M&O: Management and Operations
MAP-21: Moving Ahead for Progress in the 21st Century
MPA: Metropolitan Planning Area
MPO: Metropolitan Planning Organization
MTP: Metropolitan Transportation Plan
NAAQS: National Ambient Air Quality Standards
NO2: Nitrogen Dioxide
O3: Ozone
PM10 and PM2.5: Particulate Matter
SHSP: Strategic Highway Safety Plan
STIP: State Transportation Improvement Program
TDM: Travel Demand Management
TIP: Transportation Improvement Program
TMA: Transportation Management Area
UPWP: Unified Planning Work Program
USDOT: United States Department of Transportation