Dear :

This is in response to your letter dated September 4 which inquired about whether an analysis should be conducted for both rail and bus fixed guideway in the Environmental Impact Statement for the Honolulu High Capacity Corridor project. The build alternatives which have been considered to date are a managed lane and rail fixed guideway. Buses would operate on the managed land. The fixed guideway alternative had three different alignment options and a shorter option of 20 miles in length.

To be eligible for New Starts funding, a project must emerge from an alternatives analysis. Projects must also comply with the requirements of the National Environmental Protection Act (NEPA). Among the requirements for each of these is that all reasonable alternatives are considered. The usual process employed to do this is to enumerate a number of alternatives in the early stages of alternatives development, and screen out those that do not meet purpose and need or which have attributes that are differ little from those identified for detailed analysis. It is incumbent on project sponsors to provide the supporting evidence for screening out an alternative. New alternatives can be raised at any time in the planning and project development of a project prior to completion of the environmental requirements. As long as a project sponsor can provide valid arguments for screening out the alternative, no further consideration of it is required.

As for consideration of the bus fixed guideway, it is necessary for the project sponsor to either consider this for detailed analysis or screen it out and provide documentation describing why its further consideration should not be pursued. That description would include a discussion of why the expected costs, benefits and impacts would not differ materially from the alternatives already considered. It is quite possible that the additional costs and impacts of modifying the guideway to accommodate buses would outweigh the additional benefits. FTA would have to concur with those conclusions because we have responsibility for ensuring that the requirements for alternatives analysis and NEPA are met.

Should you have further questions on this, please contact me.

Leslie