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**From:** Ossi, Joseph (TPL)  
**To:** Turchie, Donna (TRO-09)  
**CC:** Uyeno, Ted (TRO-10); Sukys, Ray (TRO-09); Weeks, Dwayne (TPL); Borinsky, Susan (TPL)  
**Sent:** 5/23/2003 7:00:52 AM  
**Subject:** Honolulu Document

I have only had time to read the alternatives chapter (2).

1. I still find it difficult to understand from the description there, what the project is. More importantly, they seem not to have addressed our primary concerns:

a. there is no discussion of the changes made to the project described in the DEIS/SDEIS and why the changes were made;

b. there is no discussion of the proposed construction phasing and funding status of the IOS, In-town BRT, and Regional BRT elements.

2. The document is still noncommittal regarding the vehicle propulsion/guidance technology. That was okay in the DEIS, but this is the FEIS. An FEIS can present alternatives, if the impacts of each alternative are covered and one of the alternatives is identified as the preferred alternative. The "worst-case analysis" should not be accepted at this point. The embedded plate technology will undoubtedly require utility relocations and major roadway reconstruction with associated traffic disruption, and these impacts are avoidable with the other technology alternative (hybrid-electric). The document is supposed to support decision-making by providing information about the differences in impacts among the alternatives available. A design decision that involves such serious impacts cannot be deferred for later evaluation.

3. Page 2-40 states that Kalihi-Palama Bus Maintenance Facility must be expanded by an unspecified amount to accommodate the In-Town BRT. The discussion seems to suggest that the evaluation of the impacts of the shop/yard expansion is being deferred until a NEPA document on a related project is prepared. This is not acceptable. The BRT cannot serve its transportation purpose without a yard and shop for maintenance and storage of the BRT vehicles. This yard/shop expansion is integral to the BRT project and its impact evaluation cannot be deferred.

4. On page 2-40, paragraph 7 on "Mitigation Measures Requiring Permanent Construction" is out of place in Chapter 2 and should be covered in Chapter 5.

Ron Fisher has been receiving numerous letters from parties not happy with the In-Town BRT project. This is not a case where there is no likely litigant, so we should be very confident of our approach and analysis. On its face, the IOS chapter appears to be essentially an EA of the IOS project. Perhaps we should re-explore that option with the grantee.