From: Zelasko, Elizabeth (FTA)
To: Ossi, Joseph (FTA)
Sent: 11/2/2010 8:04:33 AM
Subject: FW: Draft Environmail Article on construction staging and Precast yards

Elizabeth Zelasko
Federal Transit Administration

From: Zelasko, Elizabeth (FTA)
Sent: Tuesday, November 02, 2010 1:57 PM
To: Grasty, Katie (FTA)
Subject: RE: Draft Environmail Article on construction staging and Precast yards

The argument of limiting competition and driving up project costs by restricting siting options for NEPA evaluation could be used for almost any project element. Public private partnership projects internationally are set up to give discretion to private contractors on a number of project elements including station locations, design, operation and route because that discretion can save money. Discretion to that extent with federal money is not as palatable in the US because of the way our environmental process review is handled.

It seems like our environmental documents should have a reasonable and foreseeable review of options for construction staging and precasting based on past projects in the area or recognizing land use constraints. It could be reasonable and foreseeable to identify that there are a number of other construction projects going on in the area (list projects X, Y, and Z – projects potentially also identified in the cumulative effects analysis) and that construction staging could be shared with these locations and/or it could be reasonable to identify that commercial sources would likely be used or that a new site would need to be created. The review of these facilities would not need to be extensive unless potentially significant impacts or concerns are identified during scoping.

If a contractor has a proposal later on in the process for another construction staging area and the project sponsor and FTA conducts a supplemental environmental review of the proposal, that is fine. In my opinion, it is not appropriate to have a blanket assumption that staging and casting locations are entirely not reasonably foreseeable and give sole discretion to the contractor to decide where those facilities are located.

Elizabeth Zelasko
Federal Transit Administration

From: Feldman, Kenneth (FTA)
Sent: Tuesday, November 02, 2010 12:48 PM
To: Ossi, Joseph (FTA); Uyeno, Ted (FTA); Marler, Renee (FTA); Zelasko, Elizabeth (FTA); Grasty, Katie (FTA)
Cc: Nutakor, Chris (FTA); James, Aaron (FTA); Krochalis, Rick (FTA); Gehrke, Linda (FTA)
Subject: RE: Draft Environmail Article on construction staging and Precast yards

Joe,

I disagree with the first paragraph, particularly:

"FTA does not accept this argument. The need for construction staging areas and the associated impacts that depend on the sites chosen are "reasonably foreseeable."

Often, there are precast yards set up for other projects, such as highway bridges, that a contractor may be able to use. Until a contractor is selected, well after NEPA is done, a grantee wont know where the pre-cast yard will be established. By telling contractors that they have to use a pre-cast yard identified in the NEPA document, you may

be limiting competition and driving up project costs.

I think we need to re-think this article, and come up with something that address certain projects (such as Honolulu) that may have constrained sites for pre-cast yards versus those on the mainland that have much more flexibility.

Ken

From: Ossi, Joseph (FTA)
Sent: Thursday, October 28, 2010 12:19 PM
To: Feldman, Kenneth (FTA); Uyeno, Ted (FTA); Marler, Renee (FTA); Zelasko, Elizabeth (FTA); Grasty, Katie (FTA)
Subject: RE: Draft Environmail Article on construction staging and Precast yards

Comments?

Joe Ossi
FTA Office of Planning and Environment
(202) 366-1613

From: Feldman, Kenneth (FTA)
Sent: Thursday, October 21, 2010 2:50 PM
To: Ossi, Joseph (FTA)
Cc: Nutakor, Chris (FTA); James, Aaron (FTA); Gehrke, Linda (FTA); Krochalis, Rick (FTA)
Subject: Precast construction yards

Joe,

I'd be interested in discussing this with you more before you write your article. In Region 10, we treat pre-cast concrete like other construction supplies, and don't require an environmental analysis of the potential pre-cast yards (which could be located anywhere in the nation, with the finished pieces transported to the construction site). We rely on the State or other local jurisdiction to permit the actual pre-cast yard. I understand Hawaii may be unique in this situation, because it may be cost-prohibitive to ship in the pre-cast concrete segments from the mainland, so they will need to set up pre-cast yards for the project, and therefore it's a foreseeable impact.

Ken