

### Alternatives Analysis

This project has a potential for litigation. It is important that the environmental record accurately reflect the required NEPA process. As noted by the CEQ, the alternatives analysis section of the DEIS is the heart of the environmental impact statement. It should "... sharply [define] the issues and [provide] a clear basis for choice among options by the decision-maker and the public." (40 CFR 1502.14) Alternatives eliminated from further treatment should be briefly discussed in the DEIS including the reasons for their having been eliminated.

Several alternatives for the travel corridor were evaluated in the Honolulu High-Capacity Transit Corridor Project Alternatives Analysis Report (2006) including a TSM alternative. As a result of the AA, the Honolulu City Council selected a fixed guideway transit LPA. Under ordinary circumstances, limiting the discussion of alternatives and environmental scrutiny in the DEIS to the No-build alternative and three fixed guideway transit alternatives could be seen as meeting the criteria of "incorporating alternatives by reference" as described in 23 CFR 771.123(c). However, the DEIS should take credit for our having considered other alternatives eliminated during the AA.

~~FTA believes that in the case of a mega-project with a potential for litigation, an appropriate course would be to identify an environmentally preferable alternative as required by 40 CFR 1505.2(b). The alternatives currently under review may not meet this test. The identification of an environmentally preferable alternative is not required until an environmental decision is made.~~

Please revise the discussion in the Preface, Executive Summary and Alternatives Considered sections with the goal in mind of identifying the major alternatives eliminated by the 2006 AA, including an environmentally preferable alternative. Presumably, the TSM alternative discarded in the 2006 AA, summarizing the reasons for each one's elimination, and referencing the AA document (which is presumably available on the website) for more detail. would be the alternative with the smallest environmental footprint. Review the earlier environmental documentation for the TSM. If the TSM can meet project purpose and need, elevate the discussion of the TSM in these introductory chapters, and solid reasons for its elimination, must be substantial. (continued on the next page)

~~Discuss the TSM in the fashion of environmental screening to determine if it is the alternative that will cause the least damage to the biological and physical environment. It is important that the document identify the environmentally preferable alternative.~~

According to the ADEIS narrative and Figure 2-42, HTS wishes to advance the project in five phases. The first two phases would be constructed in a largely uninhabited area from 'Ewa to Pearl City. This appears to meet the project purpose and need and more specifically the goal to "improve access to planned development." (p. 1-20). FTA notes that project construction on Phase 1 is to begin in 2009, and Phase 2 will not be completed until 2014. With the completion of Phase 2, project ridership and user benefits will apparently be negligible, and it is not until scheduled completion of the 3<sup>rd</sup> phase of the project in 2017 from Pearl Highlands to Aloha Stadium that HTS can expect reasonable ridership.

While the study corridor (Ewa to Ala Moana Center) contains approximately 50 activity centers, fewer than one-half dozen activity centers (see Figure 1-4 Activity Centers) are contained in the first two phases. Moreover, Figure 4.2 (p. 4-11) shows that future land use in the area of the three western-most stations is planned as low-density residential – hardly supportive of an elevated LRT. Based upon Figure 1-6, Employment Distribution for Oahu, there are currently around 20,000 jobs in the Phases 1 & 2 area, excluding Pearl City. Every individual employment district in Phases 3-5 either approximates or greatly exceeds all of the employment in the four employment districts of Phases 1 and 2. Projected 2030 employment in these sectors is not projected to be significantly greater in these areas.

Note that in the Daily Transit Trips summary (p. 1-11), the highest concentrations of transit dependant households are contained in the corridor's eastern portion of Phase 4 and all of Phase 5 – the very last to be served by the proposed project are those that are most in need of equity considerations. However, Phases 1, 2 and 3 will feature a total of four park-and-ride facilities that, "... would have the highest demand of people driving to access the fixed guideway system." (p.3-35) So, Phases 1-3 would serve highest income (Table 4-8), lowest ridership areas first, leaving areas with the highest concentration of households with no vehicles (Fig. 4-15) to be served at project completion. *(continued on the next page)*

One of the four goals and objectives of this project is to "improve transportation equity". (p. 1-21) Based upon proposed project phasing, transportation equity appears to be the lowest of priorities. A reading of the Highway Traffic Operating Conditions (p. 1-15) indicates that congested traffic conditions with LOS failures occur most frequently in the easternmost areas of the corridor where it is most necessary to "improve corridor mobility" and "improve corridor travel reliability" – two of the other major goals of the project. Those people most in need of public transit in the most congested area of the City will be served in 2018 while DTS plans an initial huge capital expense from 2009 to 2014 for what amounts to a demonstration project.

Reasonable project planning would identify the need for a maintenance facility as a requirement to initiate project construction. DTS appears to have met this requirement by siting the maintenance facility near Pearl Highlands. DTS then proposes to initiate project construction to the west. Good planning practice would dictate that the initial project phases should not simply address land development opportunities, but should address the three other project goals and objectives: improve corridor mobility, improve corridor travel reliability and improve transportation equity. Good planning practice would suggest the following alternative should be considered:

- Phase 1 – Leeward Community College to Aloha Stadium
- Phase 2 – Aloha Stadium to Kapolana
- Phase 3 – Kapolana to Ala Moana
- Subsequent phases

Expand the Project Phasing discussion.

- Discuss how Phases 1 and 2 meet the four goals of the project

- Discuss the alternative phasing suggested above and how such phasing would meet the goals of four goals the project
- Discuss proposed local and federal expenditure in regards to project phasing
- Discuss interim impacts caused by the proposed phasing.

Please note that per FTA guidance for Environmental Impact and Related Procedures, 23 CFR 771.111(f)(1), the action evaluated in each EIS shall “connect logical termini and be of sufficient length to address environmental matters on a broad scope.” The East Kapolei terminus is one mile short of two population centers. It is entirely unclear from the document how East Kapolei is a logical terminus inasmuch as there is no population or employment there now and it appears that there will be little in the way of population or employment there when Phase 1 is completed in 2013.

- Discuss existing land-use for the East Kapolei area and why this is a logical terminus.
- Discuss land-use sector development plans for the East Kapolei area and why this is a logical terminus.

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