
From: Bausch, Carl (FTA)
To: Ryan, James (FTA)
Sent: 1/14/2010 5:57:52 AM
Subject: FW: At-grade alternatives in Honolulu

Just between us, Jim, I have never subscribed to the notion that impacts should be characterized as “significant” in an impact statement; impact statements are prepared only because some aspect of environmental quality may be significantly affected—in my view, impacts should be disclosed in an impact statement (and there are a variety of ways of disclosing impacts), not characterized, at least not by the federal agency. Carl

From: Bausch, Carl (FTA)
Sent: Thursday, January 14, 2010 10:46 AM
To: Ryan, James (FTA); Barr, James (FTA)
Subject: RE: At-grade alternatives in Honolulu

How about this (below)?

From: Ryan, James (FTA)
Sent: Thursday, January 14, 2010 10:29 AM
To: Barr, James (FTA); Bausch, Carl (FTA)
Subject: RE: At-grade alternatives in Honolulu

OK, I forgot that important point. Here’s my attempt to include it into the relevant paragraph. As you will see, I’m hoping that one of you can supply a sentence on the implications of the “significant and unavoidable” visual impacts for the project going forward.

Thanks!

FTA staff’s view is that the consideration of at-grade alternatives has been appropriate and consistent with requirements of the National Environmental Policy Act (NEPA). Beginning with New Starts alternatives analysis, the City has evaluated a number of at-grade alignments and their visual impacts in the context of public processes. Subsequently entering the NEPA process, the City proposed to focus on elevated alternatives that better meet the purpose and need for transit improvements, provide much faster transit service, and avoid significant reductions in the city’s limited street capacity that would exacerbate already severe traffic congestion. During public scoping of the NEPA process, the City and FTA received no comments on the proposal to drop most at-grade alignment alternatives or the visual impacts of the elevated alignment alternatives. FTA relies specifically on scoping to ensure that the appropriate set of alternatives is carried into the NEPA process. In the NEPA analysis, the City has adequately developed and considered all impacts of the alternatives examined in the impact statement, including their visual impacts. Public comments on the Draft EIS include a large number of **negative** comments focused on visual impact. **FTA will acknowledged these comments and the assertedly adverse visual impacts in the final EIS.** ~~text to the Final EIS that characterizes adverse visual impacts in several locations as “significant and unavoidable.”~~ **NEED A SENTENCE HERE ON WHAT THIS MEANS GOING FORWARD.** Consequently, **for In every respect, however, both the City and FTA believe that the NEPA process has been completely satisfied.** ~~purposes, reconsideration of at-grade alternatives is not required.~~

From: Barr, James (FTA)
Sent: Thursday, January 14, 2010 10:21 AM
To: Bausch, Carl (FTA); Ryan, James (FTA)

Subject: RE: At-grade alternatives in Honolulu

If the discussion is going to revolve around visual impacts, the FEIS will state that in several areas visual impacts are “significant and unavoidable” and are in violation of at least three sector development plans. Many comments on the DEIS were related to the grossly unappealing visuals of an elevated guideway. We use FHWA guidelines to determine visual impacts i.e. Visual Impact = Visual Resource Change + Viewer Response. So, while the visual element may not have arisen during scoping, it appeared with a vengeance during DEIS public review and comment.

From: Bausch, Carl (FTA)
Sent: Thursday, January 14, 2010 10:07 AM
To: Ryan, James (FTA); Barr, James (FTA)
Subject: RE: At-grade alternatives in Honolulu

Looks good, Jim. Thanks. Carl

From: Ryan, James (FTA)
Sent: Thursday, January 14, 2010 10:02 AM
To: Bausch, Carl (FTA); Barr, James (FTA)
Subject: At-grade alternatives in Honolulu

Here's my initial draft of the paragraphs on this topic for the briefing paper. Please let me know....

At-grade alternatives. Concerns about costs and visual impacts have led to calls for consideration of at-grade rail options. Visual impacts have been cited by the Hawaii chapter of the American Institute of Architects (AIA), Kamehameha Schools (an education trust that is the largest land-owner in the state), and long-standing opponents of the project. The governor has said that the economic downturn makes it necessary to reconsider the scope of the project given its long-term financial implications for both the city and state governments. To air these concerns, the governor is hosting a forum on January 18th at which the AIA will present their views. The City and County of Honolulu, the project sponsor, has responded that at-grade alternatives and the visual impacts of elevated alternatives were given full consideration during the alternatives analysis and that revisiting these issues will delay the project.

FTA staff's view is that the consideration of at-grade alternatives has been appropriate and consistent with requirements of the National Environmental Policy Act (NEPA). Beginning with New Starts alternatives analysis, the City has evaluated a number of at-grade alignments and their visual impacts in the context of public processes. Subsequently entering the NEPA process, the City proposed to focus on elevated alternatives that better meet the purpose and need for transit improvements, provide much faster transit service, and avoid significant reductions in the city's limited street capacity that would exacerbate already severe traffic congestion. During public scoping of the NEPA process, the City and FTA received no comments on the proposal to drop most at-grade alignment alternatives or the visual impacts of the elevated alignment alternatives. FTA relies specifically on scoping to ensure that the appropriate set of alternatives is carried into the NEPA process. In the NEPA analysis, the City has adequately developed and considered all impacts of the alternatives examined in the impact statement, including their visual impacts. Consequently, for NEPA purposes, reconsideration of at-grade alternatives is not required.

Thanks.

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