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CITY AND COUNTY OF HONOLULU

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June 22, 2009

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Ms. Nancy A. McMahon
Deputy State Historic Preservation Officer
Department of Land and Natural Resources
State of Hawaii
Kakuhihewa Building
601 Kamokila Boulevard, Suite 555
Kapolei, Hawaii 96707

Dear Ms. McMahon:

Subject: Honolulu High-Capacity Transit Corridor Project

Thank you for your letter dated May 21, 2009. We appreciate your office's comments on the *Honolulu High-Capacity Transit Corridor Project Historic Effects Report* (Report). This letter responds to the concerns described in your letter and summarizes some points raised during our meeting with you, Ms. Susan Tasaki, Dr. Pua Aiu, and members of our project team on June 2, 2009. Our response also addresses points discussed with Ms. Tasaki during a project field view on June 4, 2009. Please also note that the project team provided Ms. Tasaki with visual simulations from select vantage points within the project area as requested on June 5, 2009.

In your May 21, 2009 letter, you disagree with the "no adverse effect" findings for several resources discussed in the Report. Several of your comments are based on an earlier iteration of the project's design and planning efforts that have since changed. Specifically, current design reflects changes that reduce some resource impacts that were of concern. In addition, since publication of the Draft EIS, the Airport Alternative has been selected as the Project. As a result, the Report focuses on the Airport Alternative and includes information relevant to the project as currently planned.

We respectfully disagree with the statement on Page Two of your letter that the assessments do not adequately consider the effects of the undertaking. On the contrary, the individual assessments of each aspect of integrity for each resource show that the effects for each resource were carefully considered. While your office may not concur with the effects findings for the individual resources, the project team maintains that both the letter and spirit of the law contained in Section 106 has been addressed. Additionally, the project team has determined that the undertaking as a whole has an adverse effect. We are seeking to reconcile the differences in professional opinion on the specific resources discussed below in order to determine Section 4(f) resources and category of use.

Although you state generally that your office does not believe the assessments consider the undertaking's effects, the letter does not indicate specifically why your office does not concur with the findings for each listed resource. Under 36 CFR 5(c)(2)(i), your office should "specify the reasons for the disagreement in the notification." This information will facilitate ongoing consultation and allow us to consider your perspective in the way that Section 106 intends and, where possible, reconcile differences.

In the interest of progressing in consultation, we are summarizing our approaches to assessing the following resources. Although we do not have specific insight into your concerns for each resource, we hope that some of these comments may resolve select issues. These comments reiterate the discussions with Ms. Tasaki during the field view on June 4, 2009. We remain willing to discuss and clarify ongoing issues and consider any more specific comments that your office may have.

- **Pearl Harbor National Historic Landmark:** The project team is seeking to reconcile the effect on this resource with National Park Service (NPS) staff. To date, the Navy has not expressed concern regarding adverse effects. Navy environmental staff who provided access to all Pearl Harbor resources agreed with our field assessments. Currently, in response to concerns from NPS, the Pearl Harbor Naval Base Station design has been changed to be outside the landmark boundary. The redesign now avoids even minor direct impacts.
- **CINCPAC Headquarters:** The proposed guideway will be 650 feet from this resource; and due to topography and vegetation, the project will only be minimally visible from select vantage points from within the property's historic boundary. The historic setting of the resource consists of its immediate surroundings, which include the drive from Kamehameha Highway (which was not designated as part of the NHL) and the surrounding plantings. The rather dense vegetation will serve to screen the project from the CINCPAC Headquarters. Because of the distance from the project, the lack of visibility due to surrounding plantings, and pre-existing changes to the setting, the project will have no adverse effect on the setting, feeling, or association of this resource.
- **Aiea Cemetery/Honolulu Plantation Cemetery:** The project team maintains that the area surrounding the cemetery does not retain integrity of setting, nor does it contain character-defining features. The cemetery is surrounded on all sides by highway alignments and its setting contains Aloha Stadium and other high-rise buildings, as well as power transmission poles that will be substantially higher than the proposed guideway. There are no historically significant views to or from the cemetery. The proposed project has no adverse effect on the Aiea Cemetery because there is currently no integrity of setting.
- **Tong Fat Wood Tenement Buildings:** The project is located approximately 150 feet from the tenements. Warehouses on Kaaahi Street will be partially located between the project and the tenement buildings. The project will be visible in the distance from only select vantage points within the historic boundary. The tenements' current viewshed includes non-historic industrial buildings, and no historically significant views to or from this resource were identified on the recently completed eligibility form. There will be no adverse effect to the integrity of this resource.

- **Aloha Tower:** As planned, Aloha Tower was intended to serve as a landmark for those arriving by boat. While it certainly is a local landmark from the inland area, the proposed project will not block views, although some views will be altered. Aloha Tower has only marginal integrity of setting, with Downtown high rises, proximate recently constructed buildings, and a modern shopping mall surrounding it. Although certain important buildings can be viewed from Aloha Tower, there are no significant identified viewsheds with integrity from the Tower. Downtown Honolulu has become densely built with tall buildings and busy roadways. Aloha Tower will still be able to be viewed from many vantage points without seeing the proposed project; therefore, the feeling and association of the resource will not be adversely affected. While the project will be visible from the tower, given the lack of integrity of setting, the impacts will not be adverse.
- **Walker Park:** The recently completed eligibility form with which your office concurred states that the "setting has been changed by the conversion of Fort Street to a pedestrian mall and by the addition of a paved area and fountain." The form also details additional changes to the park as well as memorial items and plaques "without their own historic significance." The form cites the park's significance as a created greenspace. There will be no impact to this greenspace. The setting outside the park does not have integrity. The feeling and association of the park within its historic boundary have already been substantially altered by the introduction of the diverse collection of elements deemed to be not significant. For all of these reasons, the project will not have an adverse effect on Walker Park.
- **Irwin Park:** In the recently completed eligibility form, Irwin Park is described as "unique in Hawaii, because it is largely a parking lot with grass medians and numerous mature monkeypod trees and coconut palms." The form states that the realignment "of Nimitz Highway has altered the mauka boundary, but the historic configuration of parking spaces among the mature trees remains." The proposed project will not impact the stated character-defining features of the park. All work will occur on the already-compromised mauka side of the parking lot, which contains the busy Nimitz Highway and does not contribute to the current significance of the resource. The lush vegetation will screen select portions of the site from the project. Although the project will be visible from some areas, the overall impact to the parking lot does not constitute an adverse effect.
- **Pier 10/11:** This building derives its significance from its relationship to the harbor. The proposed project will not interrupt this important aspect of setting. However, the setting does not have integrity due to the busy multi-lane Nimitz Highway, the recently constructed retail area, and multiple Downtown high-rise buildings. The project will not impact any other aspects of integrity, due to the strong remaining connection to the harbor and the lack of direct impacts. Therefore, there is no adverse effect to this resource.

- **DOT Harbors Division Building:** This building derives its significance under Criterion A from its association with the Harbor Commission of the Territory and its primary and significant relationship is with the water. The proposed project will not impact or interrupt this relationship. The project team acknowledges that the undertaking will occur in close proximity to this resource. However, like other resources in its proximity, changes to the mauka setting are so substantial that there is a lack of integrity of setting. Therefore, there is no adverse effect to this building.
- **Merchant Street Historic District:** The historic district is separated from the project by high-rise buildings. The project will be visible in the distance from only select vantage points within the historic district boundaries. The project will not have an adverse effect on the historic district.
- **HECO Downtown Plant and Leslie A. Hicks Building:** The small property take required from this resource's parcel of land will not impact any contributing buildings within the historic boundary. The resource has undergone numerous changes over time within the proposed boundary and its integrity will not be altered by the proposed project.
- **Six Quonset Huts:** The relocated Quonset huts' integrity of location, design, materials, and workmanship will not be impacted by the project. The Quonset huts' integrity of setting, association, and feeling are marginal at best. Although the Quonset huts, now functioning as light industrial buildings, may have gained significance from within their new setting, their integrity of setting, as recently assessed, includes numerous recently constructed commercial buildings. The project will not have an adverse effect on the setting, feeling, and association of these resources. As an aside, since the eligibility determination, a new roll-up/overhung door has been installed in the building facing Dillingham Boulevard.
- **Boulevard Saimin:** The project will require a very small property take from the parking lot of Boulevard Saimin. This area is not a character-defining feature of Boulevard Saimin. Similarly, the setting, feeling, and association of the site have minimal integrity. The project will result in no adverse effect to the resource.
- **Solmirin House:** Please note that your office concurred that the Solmirin House is not eligible for the National Register of Historic Places on November 14, 2008. Resources that are not eligible are not assessed for effect, which is why this resource was not evaluated in the Report.
- **Radford High School:** Please note that Radford High School is no longer within the Area of Potential Effects for the project. The project is approximately one mile away from this resource.

At this time, we would like to request a meeting with your office and other consulting parties to discuss in detail your concerns with these effect determinations in an attempt to resolve these differences in professional opinion. We look forward to continued consultation with your office.

Ms. Nancy A. McMahon
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Should you have any questions regarding this matter, please contact Ms. Faith Miyamoto of the Rapid Transit Division at 768-8350.

Very truly yours,


WAYNE Y. YOSHIOKA
Director

cc: The Honorable Laura H. Thielen, SHPO and
Chairperson, State Department of Land and
Natural Resources
U.S. Department of the Interior, National Park Service
Mr. Frank Hays
Dr. Elaine Jackson-Retondo
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