

<p><b>Comments on Final Design (FD) Plan Review for Aloha Stadium Station: Review period from September 30 to October 30, 2013.</b> Comments below were received in response to Consulting Party Review of FD Plans in compliance with Programmatic Agreement (PA) Stipulation IV.C. Only two parties provided comments: Navy (Signatory) and Historic Hawaii Foundation (Consulting Party). This matrix is provided per PA Stipulation IV.C: <i>The City shall consider and provide written documentation of that consideration on the project website of all comment provided by the consulting parties prior to completing preliminary engineering or final design plans.</i> This matrix is posted on the project website, under the Planning Tab, under Stipulation IV.</p>			
	(HHF)	<b>PA Consulting Party Review Comments FD Plans for Aloha Stadium Station</b>	<b>Reviewer: Historic Hawaii Foundation (HHF) - Kiersten Faulkner Date: Email to Ted Matley and Dan Grabauskas, October 9, 2013</b>
#	Description	Reviewer Comment	HART Response
1	Applicability of SOI Standards	The SOI Standards also apply to new construction affecting historic districts, buildings or sites. Did the historic architect evaluate the applicability of SOI Standards as a method for ensuring compatible and harmonious design of the station as it relates to the Pearl Harbor NHL, or did they end their analysis with the determination that a new station is not historic? The National Park Service provides additional standards and guidelines specifically for new construction to avoid and minimize adverse effects to historic properties.	<p>In recognition of the importance of the historic setting, context, association, and feeling of the Pearl Harbor NHL, HART kept the Aloha Stadium Station on the list of stations to be reviewed further during final design, despite it not being physically directly adjacent to or within the boundaries of a historic property.</p> <p>Although the Aloha Stadium Station is a proposed new construction project, it is entirely within the boundaries of the non-historic Aloha Stadium complex (constructed in approximately 1975). The closest historic property, the Pearl Harbor NHL, is across the six-lane Kamehameha Highway (including approximately 100 feet of pavement width )from Aloha Stadium and the proposed transit station. Note that immediately across the highway, the chain-link-fenced NHL property does not contain any buildings (modern or historic).</p>

			<p>Note that it is the PA Stipulation IV, that creates the definition of applicability of <i>The Secretary of the Interior's Standards for the Treatment of Historic Properties</i>, 36 C.F.R. pt. 68 (SOI Standards) for stations <b>within the boundary or directly adjacent to an eligible or listed historic property.</b></p> <p>Although HART had indicated that the SOI Standards <u>do not apply</u> to Aloha Stadium Station, every reasonable effort to avoid additional adverse effects on the NHL was taken into consideration (also see additional discussion under HHF Comment #5 below).</p> <p>When the Kamehameha Highway Station Group's SOI-qualified historic architect made a good faith effort to evaluate its design according to the SOI Standards, the conclusion was that the Standards <u>do not apply</u> to the proposed Aloha Stadium Station. The clarification needed is that the Standards do not apply, which is different from the HHF assertion that HART cannot apply the Standards, thereby invoking the requirement for a treatment plan to minimize and mitigate adverse effects on the historic property.</p> <p>The Standards apply to the restoration, rehabilitation, reconstruction and/or adaptive reuse of historic properties. Even an attempt at applying the Rehabilitation Standards (such as No 9 or No 10) results in the conclusion that they are not applicable because the station is not proposed as an addition to a historic building, complex or historic district, nor will it</p>
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			be new construction located within the boundaries of a geographically or thematically defined historic district, or within the defined boundaries of the Pearl Harbor NHL. (Also see additional discussion under Navy Comments # 4 and #5.)
2	Consultation with FTA, ACHP and Kāko’o	Have the FTA and the Kāko’o concurred with the City that the Secretary of the Interior’s Standards cannot be applied to the Aloha Stadium Station? Please provide a record of this concurrence or non-concurrence.	HART’s conclusion remains that in the case of Aloha Stadium Station, the SOI Standards do not apply and no further compliance actions are required under Stipulation IV.A of the PA. This conclusion has been discussed with the ACHP, FTA and our Kāko’o. The finding that the SOI Standards do not apply to Aloha Stadium Station was confirmed in these discussions.
3	Treatment Plan	If the FTA and Kāko’o concur with the City that the Standards cannot be applied, then the stipulation to develop a treatment plan is invoked. HHF restates and reaffirms its intention to continue as a consulting party in this matter.	In the case where the Standards <u>do not apply</u> , no treatment plan is required. Note that treatments (mitigation measures and design programs) have already been proposed and/or are being implemented to mitigate general projects impacts to the NHL.
4	Treatment Plan	To develop an appropriate treatment plan to minimize and mitigate adverse effects on the historic property, such effects should be defined as clearly as possible so that relevant treatments can be developed. HHF supports the request of other consulting parties for the City to provide information about effects on significant views to and from the NHL. We also request a preliminary determination (subject to the concurrence of the SHPO and National Park Service) on the station’s effects on setting, context, association, feeling and other aspects of historic integrity; and direct, indirect and cumulative effects on the NHL.	See discussion under HHF Comment #3 above. No treatment plan is required. Also note that the PA itself is a tool to mitigate adverse effects of the project on the NHL. Regardless of the applicability of the SOI Standards for Aloha Stadium Station, Consulting Parties (including signatories) were given opportunity to provide input at the voluntary Focus Meeting and to review the proposed Aloha Stadium Station Final Design Plans.

5	Mitigation Measures	<p>HHF suggests that the treatment plan should address ways to minimize the station’s impact on the components that will be adversely affected, potentially through reduced massing and footprint or other intrusions on context, setting, feeling, and association. If minimization efforts are not achievable, then strong mitigation measures must be developed.</p>	<p>HART reiterates that it acknowledges the Aloha Stadium Station as a new construction project located in the vicinity of the Pearl Harbor NHL that would affect its historic context in a general way, consistent with the Final Environmental Impact Statement (FEIS) . As presented at our Consulting Parties Meeting of October 3, 2013, mitigation measures have already been identified and approved through the FEIS and Section 106 process, including but not limited to:</p> <ul style="list-style-type: none"> <li>• <b>FEIS</b> - the removal of makai touchdowns for Aloha Stadium Station from within the Pearl Harbor NHL</li> <li>• <b>PA Stipulation IV.A</b> - application of the programs associated with the intent of the Design Language Pattern Book as presented at the October 3, 2013 Consulting Party Meeting and documented in final design plans for Aloha Stadium Station</li> <li>• <b>PA Stipulation V.C</b> - completion (in progress) of Pearl Harbor NHL Historic American Engineering Record (HAER) and various Historic American Buildings Survey (HABS) documentation for other Navy properties</li> <li>• <b>PA Stipulations VI.B and C</b> - National Register nominations and updates for the Pearl Harbor NHL and various other Navy properties (in progress)</li> <li>• <b>PA Stipulation VII</b> - various elements of the Educational and Interpretive Programs, Materials and Signage, not tied to completion of final design</li> </ul>
6	Multi-modal connectivity	<p>In determining mitigation measures, HHF recommends that specific and special attention be given to the nexus between the NHL and the anticipated users of the rail system and the stadium station. At minimum, these</p>	<p>HART appreciates your interest in the multi-modal neighborhood connectivity elements of the rail station, the Aloha Stadium, and the National Park Service (NPS) Visitors Center at Pearl Harbor. We assure you that</p>

		<p>would include patrons of Aloha Stadium; residents of nearby housing areas; visitors to the Pearl Harbor Visitor Center and Historic Sites; and residents and workers to Ford Island. HHF suggests that the treatment plan should address ways to link travelers to the NHL (e.g. Pearl Harbor Visitors Center or Ford Island). HHF is also open to other mitigation as may be suggested during the consultation process.</p>	<p>those issues, which are outside the requirements of the PA (created to mitigate adverse effects to historic properties, i.e. impacts that may alter any of the characteristics that qualify a historic property for inclusion on the National Register) are a high priority at HART. These elements of the project are being coordinated with the City and County of Honolulu Department of Transportation Services, the Navy and the NPS as we develop bus-rail integration plans and other city-wide transportation interface elements system-wide.</p> <p>Also see discussion under HHF Comment #3 above. No treatment plan is required.</p>
7	<p>SOI Standards for other properties and “lessons learned” exercise.</p>	<p>HHF anticipates that similar findings of the inability to apply the SOI Standards at other stations in or adjacent to historic districts or properties. This possibility is precisely why the alternative mitigation stipulation was included in the PA. Therefore, we recommend that the City develop a consultation protocol for future station design issues in which this same stipulation will be invoked. We note that the intent of PA Stipulation I.H.12 (Kāko’o Roles and Responsibilities) to develop a best practice manual related to historic properties and Section 106 “lessons learned” was meant to be “helpful on future Section 106 processes on this and other projects.” We recommend that the manual be completed and used as a resource in developing the treatment plan consultation protocol.</p>	<p>HART acknowledges the HHF opinion regarding other stations as speculative. HART will continue to outreach to all the Consulting Parties, including HHF, to participate in the review of other stations in or directly adjacent to historic districts or properties. Each station presents a unique opportunity.</p> <p>Per the PA Stipulation I.H.12, the “lessons learned case study” and best practice manual are to be developed by the Kāko’o based on this project and are expected for completion “within one (1) year of the completion of Phase 1 construction (approximately 2017, although an effort is being made to expedite this task).</p> <p>Note the HART’s position is that the SOI Standards (as referenced in the PA) are not applicable not that HART is unable to apply the Standards. In all other areas of</p>

			<p>the PA, HART has treated the Aloha Stadium Station Design to acknowledge it’s general proximity to the Pearl Harbor NHL:</p> <ul style="list-style-type: none"> <li>— <b>Aloha Stadium Station was kept on the list</b> for consideration even after it’s makai touchdown in the NHL was eliminated during the FEIS process.</li> <li>— <b>Per Stipulation XI</b> - HART required Anil Verma Associates (Station Final Designer) to provide an SOI Qualified Historic Architect (Lorraine Minatoishi was selected) to assess the Aloha Stadium Station. This collaboration resulted in the presentation made at the voluntary October 3, 2013 Focus Meeting that examined impacts and mitigation of for the Aloha Stadium Station area.</li> <li>— <b>Per Stipulation IV.A and B. and beyond</b> - A voluntary Focus Meeting was held for this station. While HART and Minatoishi made every effort to engage Consulting Parties to provide input to further avoid or reduce adverse effect on the NHL, Consulting Parties chose to focus on fare gates, traffic and pedestrian movements.</li> <li>— <b>Per Stipulation IV.C.</b>, the optional opportunity for a 30-day review of final design plans was provided. Again no specific recommendations were received suggesting any further “historic preservation mitigation” design actions for this station - as can be seen in the comments shown in this matrix.</li> </ul>
8	Architectural Detailing	Finally, HHF’s concerns about the station design and its effect on historic properties are based on fundamental issues of scale, mass, bulk, site plan, and architectural detailing. Issues such as the color of the metal panels , concrete coatings and security screens are trivial in the	HART acknowledges the HHF comment and will continue to apply the requirements of the PA as identified in Stipulation IV Design Standards and Stipulation VII. Educational and Interpretive Programs, Materials and Signage.

		face of the larger issues. We prefer to focus the historic preservation design discussion on the issues relevant to historic properties. We will leave color and wallpaper selection to the art committee to integrate with plans for art, interpretive elements, signage and other finishes, until and unless such matters rise to the level of effect on historic properties.	Subsequent to the FEIS, the physical location, scale, mass and bulk of stations and guideway are largely restricted. In the case of the Aloha Stadium Station, security issues with the Naval base require screening at the station that is also not optional. The various programs provided by the HART Station Architect and architectural detailing regarding issues of color, coatings, screening and landscaping were the elements available for added mitigation during final design.
	<b>NAVY</b>	<b>PA Signatory-Consulting Party Review Comments FD Plans for Aloha Stadium Station</b>	<b>Reviewer: U.S. Navy - M.D. Williamson Date: November 27, 2013</b>
<b>#</b>		<b>Reviewer Comment</b>	<b>HART Response</b>
1	Plan Review	<p>Kamehameha Highway Station Group (KHSO) Design Workshop No. 1 for Consulting Parties and Aloha Stadium Station "Focus Meeting" for Consulting Parties were held on October 3, 2013 by HART.</p> <ul style="list-style-type: none"> <li>— The Navy received an abbreviated set of the HRTD Aloha Stadium Station Interim Design Plans (dated 27 Sept 2013).</li> <li>— Written comments from consulting parties were requested to be submitted by mail or via email no later than October 30.</li> <li>— Navy requested full sets of station and guideway drawings to assist in planning and review process. Complete documents have not been provided to date.</li> </ul>	<p>We apologize as HART has no record of a request a full set of plan sheets for the guideway and the station. HART will provide the information requested, if still desired (please contact <a href="mailto:JMorsicato@honolulu.gov">JMorsicato@honolulu.gov</a> with your request).</p>

2	Stipulation IV.A	<p>Pursuant to HHCTCP Programmatic Agreement Stipulation IV.A. Design Standards:</p> <ul style="list-style-type: none"> <li>— “For stations within the boundary of or directly adjacent to an eligible or listed historic property, the City shall comply with the Secretary of the Interior’s Standards for the Treatment of Historic Properties, 36 CFR Part 68, and will make every reasonable effort to avoid adverse effects on historic properties.”</li> </ul>	<p>This is a correct quotation from the PA. Note that because the Aloha Stadium Station is not within the boundary of or directly adjacent to an eligible or listed historic property, HART has determined that these SOI Standards are not applicable for this specific station.</p>
3	October Meeting Presentation	<p>The Historical Architect (HA) on HART’s architectural design team provided a Historic Architect Review for the Aloha Stadium Station Design. The HA presented an interpretation of the requirements of the Secretary of the Interior’s Standards for the Treatment of Historic Structures as applicable to the proposed station location and design.</p>	<p>Please note, here is the correct statement from the October 3<sup>rd</sup> Focus Meeting where the presentation (Lorraine Minatoishi) and PPT slide #13 noted: “Aloha Stadium and the proposed station are not historic properties. Consequently <i>SOI Treatment of Historic Properties</i> including Restoration, Rehabilitation, Reconstruction and/or Adaptive Reuse Guidelines do not apply. As a result, the <i>Secretary of the Interior’s (SOI) Standards</i> for the Treatment of Historic Properties (36 CFR 68) cannot be used as a mitigation tool.” Further, the Aloha Stadium Station is not directly adjacent to any other historic property.</p>
4	SOI Standard applicability	<p>Please find the following comments regarding the HA’s conclusions as presented on 3 October 2013:</p> <ul style="list-style-type: none"> <li>— Stipulation IV.A is applicable to the Aloha Stadium Station as the station site is directly adjacent to the Pearl Harbor National Historic Landmark (PHNHL).</li> </ul>	<p>Four bullets point responses are made to match this comment.</p> <ul style="list-style-type: none"> <li>— The assumption is the HA presented that Stipulation IV.A. (SOI Standards) was applicable to Aloha Stadium due to it being directly adjacent to the Pearl Harbor NHL. This is inaccurate.</li> </ul>

		<ul style="list-style-type: none"> <li>— Disagree with statements that there would be no impacts on the Pearl Harbor National Historic Landmark.</li> <li>— Believe HA’s analysis for visual impacts to the PHNHL to be insufficient: HA’s analysis did not consider the visual impacts looking towards the PHNHL and along the Kamehameha Highway corridor in relation to the PHNHL.</li> <li>— Disagree with HA’s contention that the Secretary of the Interior’s Standards are not applicable because Aloha Stadium is not considered historic and therefore Secretary of the Interior’s Standards cannot be used as a mitigation tool.</li> </ul>	<ul style="list-style-type: none"> <li>— The HA recognized that a finding of adverse effect has already been made for the NHL (per PPT slide #10).</li> <li>— HART acknowledges the disagreement regarding visual impacts to the Pearl Harbor NHL and consideration of views <u>towards</u> the Pearl Harbor NHL . Views of the Pearl Harbor NHL from mauka of Kamehameha Highway in the vicinity of Aloha Stadium Station are already affected by the presence of the stadium itself and the highway and even other new construction within the Pearl Harbor NHL (new visitor center). The guideway and rail station were not found to affect the status of the National Register eligibility of the Pearl Harbor NHL. The FEIS includes extensive analysis of visual impacts in this area.</li> <li>— There are two clarifications here: one is that Aloha Stadium and property are not historic, and the second is the acknowledgement that the Pearl Harbor NHL is not directly adjacent to the station or the guideway (which is located mauka of six-lane Kamehameha Highway at this location). The discussion under HHF Comments #1 and #2 provide further clarity.</li> </ul>
5	SOI Standard applicability	The Secretary of the Interior’s Standards provide guidance for new construction to avoid and minimize adverse effects to historic properties in terms of site and setting (districts/neighborhoods).	Note again that HART is not attempting to apply the Standards to this particular station since is it not directly adjacent to the PHNHL. Also see comment above regarding Navy Comment #4, bullet-3. Views

		<ul style="list-style-type: none"> <li>— “The setting is the larger area or environment in which a historic property is located. It may be an urban, suburban, or rural neighborhood or a natural landscape in which buildings have been constructed. The relationship of buildings to each other, setbacks, fence patterns, views, driveways and walkways, and street trees together create the character of a district or neighborhood.”</li> </ul>	<p>from immediately across Kamehameha Highway (on Pearl Harbor NHL property) are through a chain-link fence towards the highway, then the asphalt parking lot that will be the location of the transit station, and lastly of the Aloha Stadium itself. There are no buildings in the NHL adjacent to the highway in this area.</p> <p>Also see discussion above under HHF Comment #5 for mitigation measures.</p>
6	SOI Standard applicability	The Secretary of the Interiors Standards shall apply for redevelopment from the aspect of compatible infill, treatment of cultural landscapes, treatment of NHL districts and for appropriateness to the neighborhood setting.	See response to Navy Comment #5 above.
7	SOI Standard applicability	The design for the facility shall follow the Secretary of the Interior’s Standards and Guidelines. Considerations in design shall be given to appropriate scale, size massing style setting materials relationship of solids to voids color, form, detailing roof line, and landscaping within the context of the historic site and compatibility with the historic existing and former structures, site features and current neighborhood setting.	<p>Note again that HART is not attempting to apply the Standards to this particular station since is it not directly adjacent to the Pearl Harbor NHL.</p> <p>See response to HHF Comment #8 above. The project team made a presentation at the Aloha Stadium Focus Meeting suggesting possible ways to provide additional mitigation regarding. None of the Consulting Parties presented any suggestions or support to implement these options.</p>
8	Treatment Plan	<p>Pursuant to HHCTCP Programmatic Agreement Stipulation IV.A. Design Standards:</p> <ul style="list-style-type: none"> <li>— “If the FTA, the City and Kako’o find that the standards cannot be applied, the City shall consult with the consulting parties to develop a treatment plan to minimize and mitigate adverse effects on</li> </ul>	See response to HHF Comments #3 - #5 above.

		the historic property.”	
9	Station impact on PHNHL	Request preliminary determination on the station’s effects on setting, context, association, feeling and other aspects of historic integrity including direct, indirect, and cumulative effects on the PHNHL.	See discussions in the FEIS. No additional discussion is required at this phase of the project. The PA has been created to implement mitigation of the adverse effects already identified. See response to Navy Comment #5 and HHF Comment #5 above.
10	Treatment Plan and Mitigation	Support consideration of mitigation measures for a treatment plan if minimization efforts are not feasible. — Treatment plan that addresses safety concerns for pedestrian crossing along Kamehameha Highway and vehicular circulation at the Ford Island bridge.	Pedestrian and vehicular circulation are important elements of the project, but these are not associated with the Section 106 Consultation Process for mitigation of the general adverse effects to the Pearl Harbor NHL as identified in the FEIS. Also see response to HHF Comment #6 above.
11	Traffic Impacts - Questions and Comments	The overhead rail guideway will require removal of, at a minimum, 15’ from the Kamehameha right-of way for its construction and for protective curbing around the columns. This will restrict the roadway right-of-way for increasing traffic in the future. Construction of the guideway could close portions of the highway for up to two years.	See FEIS for additional discussion, Table 3.27 explains temporary closures at Salt Lake Boulevard and Kamehameha Highway as one lane ewa-bound (Kapolei bound) during peak periods. Pedestrian and vehicular circulation are important elements of the project, but these elements are not associated with the Section 106 Consultation Process for mitigation of the general adverse effects to the Pearl Harbor NHL identified in the FEIS.
12	Traffic Impacts - Questions and Comments	Currently, there is no overhead pedestrian walkway for Rail patrons to access the Pearl Harbor Historic Sites Visitor Center from the current station location. If Rail patrons elect to walk across Kamehameha Highway they will also impede the traffic flow along Kamehameha Highway.	No overhead pedestrian walkway has been proposed for this station in association with the current project. Although pedestrian and vehicular circulation are important elements of the project, these elements are not associated with the Section 106 Consultation Process for mitigation of the general adverse effects to the Pearl Harbor NHL identified in the FEIS.

13	Traffic Impacts - Questions and Comments	<p>One recommendation was to place a trolley system on the old OR&amp;L and Plantation Railroad right-way ways that are current roadways on the harbor side of the Kamehameha Highway.</p> <ul style="list-style-type: none"> <li>— Adding a trolley for transportation of patrons to the Visitors Centre would reduce adding traffic on Kamehameha Highway.</li> </ul>	<p>HART acknowledges the suggestion. This is outside the scope of the H RTP FEIS/ROD approved and FFGA funded project. It is a reasonable suggestion to coordinate with the City and County of Honolulu Department of Transportation Services at a future date.</p>
14	Visual, Security and Noise Concerns	<p>The elevated guideway will create visual, security, and noise concerns and impacts along the Kamehameha Highway right-of-way adjacent to the Naval Base.</p> <ul style="list-style-type: none"> <li>— The Navy staff previously provided written comments at three other public meetings to HART staff expressing the Navy’s concerns about impacts of the guideway on historic view planes, security, and increased noise caused from the elevated steel wheels.</li> <li>— Consider expanding barriers to include the guideway that will impact the Naval Base and associated Historic Districts and NHLs.</li> </ul>	<p>HART Safety and Security Team continues to coordinate these sensitive issues with appropriate Navy staff. This is not associated with the Section Consultation Process for mitigation of the general adverse effects to the Pearl Harbor NHL identified in the FEIS.</p>
15	Visual, Security and Noise Concerns	<p>As mitigation, it was recommended to provide vision and noise barriers along the infringing guideway along both sides to minimize the negative impacts. It was previously recommended that this mitigation would be necessary along the guideway from Halawa Stream to the intersection at Center Drive.</p>	<p>HART Safety and Security Team continues to coordinate these sensitive issues with appropriate Navy staff. This is not associated with the Section 106 Consultation Process for mitigation of the general adverse effects to the Pearl Harbor NHL identified in the FEIS.</p>
16	Visual, Security and Noise Concerns	<p>All of the above concerns will be applicable at the Pearl Harbor Makalapa Station site.</p>	<p>The manner in which these concerns are addressed for both stations will remain consistent.</p>