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A Chapter of The American Institute of Architects

December 6, 2010

Ms. Elizabeth Zelasko
Federal Preservation Officer
Federal Transit Administration, E45-340
1200 New Jersey Ave. SE
Washington, DC 20590

Mr. Wayne Yoshioka
Director, Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813

RE: Comments on Draft PA for Honolulu Rapid Transit Project

Dear Ms. Zelasko and Mr. Yoshioka:

Thank you for the opportunity to Comment on the Draft Programmatic Agreement for the Honolulu Rapid Transit which we received by e-mail on November 17, 2010. We are surprised that we would receive another Draft when the consulting parties have not met on the agreement in more than 13 months.

Many of the issues raised in previous correspondence still exist in the revised Programmatic Agreement. There has been no explanation on the City's part why certain suggestions from the Consulting parties have not been incorporated. We are further surprised that issues identified and agreed as critical in the previous draft PA have not even been started.

The most critical need is the Archaeological Inventory Survey and the identification of Traditional Cultural Properties. As you know, these items should have been undertaken before the alternative analysis was completed. Information from these surveys may indicate a 'historic property taking' for the proposed route. This will impact Section 4(F) procedures. To have done no work on these critical elements in 13 months is completely inadequate procedure.

The Programmatic agreement lists sites as being negatively impacted by the Honolulu Area Rapid Transit. However, the specific 'negative effect' is not listed for all 33 impacted sites. There is now new wording about "unanticipated" effects. However, the actual effects have yet to be spelled out.

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The APE Mapping provided as an attachment is very inconsistently drawn. The sequence is not numerical. Sometimes there is no APE delineated at all on the map and sometimes an eliminated alternative has been mapped. Some maps show the same area with two different APEs delineated. Some maps show a station in a new location adjacent or in a historic district that has not been discussed by the consulting parties. Obviously additional accurate drawing and labeling needs to occur on these maps and the digitizing of the maps optimized so they can be downloaded by most consulting parties in less than two hours.

Your attention is again brought to the inaccurate listing of consulting parties. Many of those listed have not participated in any of the discussions. AIA Honolulu is also still inaccurately titled, American Institute of Architects. This is the name of the national organization.

We request a meeting of the consulting parties so that our concerns expressed over several years can be adequately addressed.

Sincerely yours,

Spencer Leineweber

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AIA Honolulu President 2011

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