

December 3, 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:

On behalf of the National Trust for Historic Preservation, I submit the enclosed comments on the draft Programmatic Agreement (PA) for the Honolulu Transit project, which we received by email on November 17, 2010. The attachments were received via FTP site the next day.

At the outset, we would like to raise several objections to the way in which the Section 106 consultation process has been conducted during the past year. In light of the fact that it has been 13 months since the last comment opportunity was provided to the consulting parties, and we have received very little communication at all during that interim period, it is unreasonable to provide only ten working days for us to develop comments on the revised draft of the PA. Furthermore, many of the comments that were raised by the consulting parties last year have never received a meaningful response. We also object to the exclusion of the non-governmental consulting parties from the consultation that has been taking place during the past year. While we appreciate the efforts of the FTA and the City to be responsive to the concerns of the State Historic Preservation Office, those consultation discussions should have included all consulting parties, rather than being conducted as private, back-room discussions.

We also have a number of concerns and questions regarding the role of the Navy. The Navy has emerged as a full signatory to the PA in the current draft (which is appropriate, in our view, since Navy land will be used for a portion of the project). However, the Navy has never participated in the Section 106 consultation, and the Navy's roles and responsibilities remain undefined. As you know, the National Trust raised serious concerns last year regarding the inadequate boundary definition and effect determinations for the Makalapa Historic District(s) on Navy land. Those concerns remain unresolved.

We are disappointed that in the past year the City has not begun to pull together some of the basic information called for in the PA—for example, the identification of Traditional Cultural Properties and the calculation of the baseline numbers of demolition permits between 2005-2008. There is no good reason to defer the development of this information.

Our detailed comments on the current draft of the PA are indicated on the document itself (see attached document). In addition, I have attached our November 23, 2009 comment letter for reference, because many of the comments raised in that letter have not been adequately addressed.

Thank you for the opportunity to comment. We urge the City and the FTA to schedule a consultation meeting to address these comments.

Elizabeth Zelasko, FTA
Wayne Yoshioka, City & County of Honolulu
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Sincerely,



Elizabeth S. Merritt
Deputy General Counsel

cc:

FTA: Ted Matley

ACHP: Blythe Semmer, Louise Brodnitz, Charlene Vaughn, Reid Nelson

NPS: Elaine Jackson-Retondo, Frank Hays, Melia Lane-Kamahele

Navy: Randall Young

SHPD: Pua Aiu, Laura Thielen

DTS: Faith Miyamoto

OIBC: Kehau Abad, Kawika McKeagan, Hinalaimoana Falemei

Prince Kūhiō Hawaiian Civic Club: Chasmin Aokoloski

Koolaupoko Hawaiian Civic Club: Mahealani Cypher

HUI MĀLAMA: Edward Halealoha Ayau

HCDA: Deepak Neupane

OHA: Keola Lindsey

PB: Lawrence Spurgeon, Stephanie Foell

AIA: Jeff Nishi, Amy Blagriff, Spencer Leineweber

HHF: Kiersten Faulkner, Wendy Wachman

NTHP: Brian Turner