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September 26, 2008

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

LOG NO: 2008.3762
DOC NO: 0809AL44
Architecture

Dear Mr. Yoshioka:

SUBJECT: Section 106 (NHPA) Consultation
Honolulu High-Capacity Transit Corridor
Purpose and Need for the Project and Alternatives Chapters, Draft
Environmental Impact Statement
Technical Report: Historic Resources
Island of O'ahu
TMK: (1) (various)

This is in response to your transmittal, dated August 18 and received in our office on August 22, 2008. Thank you for providing the opportunity to comment on the draft Historic Resources Technical Report, dated August 1, as well as confidential, intergovernmental advance portions of the draft Environmental Impact Statement. Our office requested to postpone our response until after our September 19 project update and coordination meeting with staff from Parsons Brinckerhoff, Mason Architects Inc., and other stakeholders. This slight delay enables us to incorporate useful information from that meeting into our response.

The proposed project covers the fundable twenty-mile segment of the corridor between East Kapolei and the Ala Moana Center with alternatives for both Fixed Guideway Transit Alternatives of the Salt Lake and Airport routes. Complete analysis of the historic resources and determination of effect for the University of Hawaii, West Kapolei, and Waikiki spurs have not been fully addressed in the documentation, as those portions of the project are not yet funded and will be subject to additional consultation at a future time. Consultation between the Federal Transit Administration, State Historic Preservation Officer, and other consulting and concurring parties will result in a Memorandum of Agreement regarding the proposed undertaking's impact to architectural resources.

The State Historic Preservation Division (SHPD) has several comments that it would like to offer for consideration at this time:

Table S-1: Summary of Identification, Evaluation, and Effects—Historic Resources (p. S-2) presents the findings of the number of State or National Register of Historic Places listed, known eligible, or evaluated eligible resources, numbering in total 119 if both the Salt Lake and Airport segments are completed. However, the summary only indicates a total of six resources for which the FTA proposes a determination of adverse effect due to demolition. The SHPD does not concur with this preliminary determination that adverse effects for this project are limited to those six resources. The Historic Hawai'i Foundation expressed the same concern in their letter of September 15, specifically regarding

construction passing over historic bridges, indirect impacts, and individual listed resources and districts. Examples of indirect impacts would include those to landscapes such as the Sumida Watercress Farm and 'Aiea Plantation Cemetery, and to individual resources such as the PetsWell Animal Hospital designed by locally renowned architect Vladimir Ossipoff.

However, our discussion indicated that the Federal Transit Administration has not yet completed its review for effect determinations pending our office's response to individual eligibility determinations. In a separate transmittal shortly forthcoming, the SHPD will comment in more detail regarding the findings of the technical report in relation to the eligibility determinations submitted for individual resources. We appreciate the amount of substantive research that characterizes the submitted documentation.

Furthermore, we were encouraged that at our meeting it was indicated that indirect impacts to landscape and setting, including viewsheds *makai* to *mauka*, will be examined to determine the broader impact of the corridor itself. We believe that this macroscopic dimension will aid in accurately reflecting the comprehensive effect of the proposed project and in turn facilitate identification of appropriate mitigation.

·Based on new information emerging regarding resources in the vicinity of former Marine Corps Air Station 'Ewa Field, additional consideration should be given to resources, if any, in the area of potential effect associated with the December 7, 1941 attack. Please further qualify the description of MCAS 'Ewa (p. 4-2), for which a few resources remain extant (p. 4-8). Ongoing consultation with the Navy regarding the transfer of parcels in this area to a private developer has recently revealed the necessity for more thorough investigation as to the status and eligibility of these resources. This includes the MCAS 'Ewa runways (p. 4-10), which should be evaluated in accordance with the National Park Service bulletin, *Guidelines for Identifying, Evaluating, and Registering America's Historic Battlefields*.

·In response to the description of proposed station characteristics and potential siting (pp. 2-19-31), the SHPD suggests in the next few months, as more information comes available, engaging in a site visit to better visualize scale and setting at these locations. We are also interested in additional information regarding the dimensions and materials of the stations and how stations will be individualized to harmonize with the local character of a neighborhood or site. Staff from Parsons Brinckerhoff has very helpfully provided CADD renderings of the corridor at locations including the Nu'uuanu Stream Bridge, and we would be interested in similar visuals for the proposed stations.

Regarding the image (fig. 2-41) depicting the installation of a traction power substation, we would like to inquire as to whether there will be an effort to provide a design component to these mechanical features/support facilities so that they better harmonize with the local character of their setting.

·Please clarify as to whether the Advisory Council on Historic Preservation is formally participating in this consultation. It is also our understanding that the National Trust for Historic Preservation and Hawaii's Thousand Friends have expressed interest in participating in consultation. As such, they should be included in the list figured on pp. 2-4-5.

·Due to the stated importance (p. 2-4) of the Chinatown National Register district's historic connection with the waterfront, we believe that the placement of the transit corridor will result in an adverse effect on that district, although planners have made distinct efforts to minimize that harm. As a result, the updating of the Chinatown NRHP nomination would constitute appropriate mitigation.

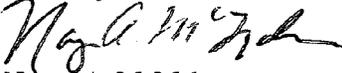
Regarding mitigation, the SHPD strongly supports the suggestions offered by the Historic Hawai'i Foundation as proportional to the direct, indirect, and cumulative impacts of the corridor. These include: public access to documentation; National Register updates and nominations; City and County of Honolulu certified local government designation; Main Street program development; restoration of historic Irwin Park; and context sensitive design solutions. In compliment, the SHPD would like to add, in terms of public access to documentation, that digitization of our office's O'ahu Island inventory would contribute to the National Conference of State Historic Preservation Officers' ongoing effort to promote a comprehensive, nationwide historic resources inventory. Additionally, if historic as well as contemporary Sanborn Fire Insurance maps could be provided to our office, it would enhance the SHPD's future ability to accurately review projects on O'ahu as well as contribute to the availability of this type of documentation to the public.

The draft Technical Report also offers suggestion of forms of mitigation, including Historic American Building Survey documentation. The statement on p. 6-2, however, should be clarified: "All of this documentation would be provided to SHPD, who would have a role in coordinating and completing this effort." While our office would act as a repository for mitigation documentation, due to understaffing, we would not be able to take an active role in completing any documentation. Other suggestions include interpretive signage, cultural landscape reports, historic context reports, and multiple property NRHP submissions. Our office appreciates all of these suggestions, which along with those offered by Historic Hawai'i Foundation, should be actively considered as consultation continues. Regarding cultural landscape reports, it would be appropriate, given the overall adverse effect of the project (p. 5-9), to complete a report that extends the length of the corridor.

To confirm from our meeting, the final EIS will include the list of properties proposed to be acquired or demolished as well as identify the preferred alternative regarding the Salt Lake Boulevard and Airport routes. This information will aid in ongoing discussion regarding mitigation commitments.

Thank you for the opportunity to comment. Comments from our Archaeology and History and Culture branches will be sent under separate cover. Should you have any additional questions or concerns, please do not hesitate to contact Dr. Astrid Liverman in our O'ahu office at (808) 692-8015.

Sincerely,



Nancy A. McMahon
Deputy State Historic Preservation Officer

AMBL:

c:

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