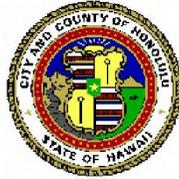


DEPARTMENT OF TRANSPORTATION SERVICES
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December 31, 2009

RT12/09-347328

Commander Lore Aguayo
Code PRP
Naval Facilities Engineering Command Hawaii
400 Marshall Road
Pearl Harbor, Hawaii 96860-3139

Dear Commander Aguayo:

Subject: Honolulu High-Capacity Transit Corridor Project

As part of the Honolulu High-Capacity Transit Corridor Project (the Project), the Federal Transit Administration (FTA) followed the Section 106 process of the National Historic Preservation Act (NHPA) of 1966, as amended (16 USC 470f) and its implementing regulation at 36 CFR 800. Qualified architectural historians assessed the eligibility and effects of the Makalapa Navy Housing and Little Makalapa Navy Housing areas. The two housing areas were evaluated as separate historic districts. Both were determined to be eligible for listing in the National Register of Historic Places (NRHP). As a consulting party, the U.S. Navy was provided with the *Historic Resources Technical Report* in August 2008. The Navy's comments on this report did not reflect any concern with the evaluation of the Makalapa Navy Housing and Little Makalapa Navy Housing areas as separate resources. The Hawaii State Historic Preservation Division (SHPD) concurred with the eligibility determinations for the Makalapa Navy Housing and Little Makalapa Navy Housing areas.

Continuing the Section 106 process, FTA completed a separate effects report in April 2009. The *Historic Effects Report* assessed project effects on all historic properties that were eligible for listing in the NRHP. Because the Makalapa Navy Housing and Little Makalapa Navy Housing areas were evaluated for eligibility separately, they were also evaluated separately for effects. The U.S. Navy assisted the Project's architectural historian with access to all Pearl Harbor properties.

The Project has been determined to have an adverse effect on the Makalapa Navy Housing. The guideway will introduce a substantial new element into the Makalapa Navy Housing's setting that is not in keeping with the area's residential appeal. While the Project will have no effect on the integrity of location, design, materials, workmanship, and association, its setting will be altered by the guideway. Also, views from the backyards of residences along Kamehameha Highway will be adversely affected by the elevated guideway. However, no audible or atmospheric effects to this property were identified.

Based on SHPD's concurrence, the station will be located outside of the NRHP boundary and will not adversely affect the historic property. However, the Project will adversely affect the integrity of feeling of the historic property. The Makalapa Navy Housing has a moderate level of integrity of feeling. It conveys its origins as a 1940s military housing complex despite changes to the houses. The Project will not affect any of the property's physical features, but it will diminish the property's expression of its historic residential character. The Project will introduce a new and incompatible component into the adjacent setting, resulting in an adverse effect.

The Project will have no adverse effect on the Little Makalapa Navy Housing, which is adjacent to Kamehameha Highway. There will be no effect to the integrity of location, design, materials, association, and feeling. Also, there will be no adverse effect to the integrity of setting. Within the NRHP boundary, the Project will not be visible from select areas because of distance to the guideway. Houses that are closer to the project alignment will be shielded from the guideway by an existing tall sound wall that screens the former residences from the roadway and also blocks views to the guideway. The station will be located outside of the NRHP boundary and will be screened by substantial vegetation from the rear of the closest houses. Furthermore, no audible or atmospheric effects to this property were identified. Because the guideway and station will introduce a new element into the Little Makalapa Navy Housing's setting, there will be an effect; however, these changes will result in a determination of No Adverse Effect to the setting.

The FTA provided the U.S. Navy with a copy of the *Historic Effects Report* in April 2009, which documented the above conclusions. The Navy did not provide comments on this report to the FTA within 30 days, as requested, implying concurrence with the report's contents. At a July 2009 meeting with U.S. Navy staff to discuss comments and questions about the Project's effects to historic resources, the U.S. Navy provided a copy of a map that was identified as being from its 2002 *Integrated Cultural Resources Management Plan* (ICRMP). We understand that the ICRMP is currently being updated. The map reflects a single management area that shows

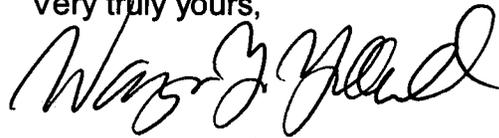
distinct areas for both the Makalapa Navy Housing and the Little Makalapa Navy Housing. It is the City's understanding that the boundary shown in the 2002 ICRMP has not been formally determined by the U.S. Navy to be eligible for listing on the National Register of Historic Places under Section 106, nor has it been submitted to the SHPD for concurrence and/or submitted to the Keeper of the National Register of Historic Places for inclusion on the National Register.

The SHPD concurred with the effects determinations contained in the *Historic Effects Report*, with the exception of 11 resources that the agency believed were adversely affected. FTA accepted these determinations. Little Makalapa Navy Housing was not among those resources, and the no adverse effect determination remained in place.

Note that a change in the determination of eligibility and effect at this late time would also have implications to analysis of resources under Section 4(f) of the U.S. Department of Transportation Act. The re-evaluation could require the selection of an avoidance alternative to use of the resource.

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

Very truly yours,



Wayne Y. Yoshioka
Director

cc: Mr. Ted Matley, Federal Transit Administration
Mr. Lawrence Spurgeon, PB Americas, Inc.
Mr. Aaron Poentis, Code EV, Naval Facilities Engineering Command Hawaii