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Sent: 8/31/2009 9:26:10 AM
Subject: Honolulu Transit Project -Discussion of Outstanding Mitigation Issues

All,

As requested by the consulting parties, FTA has reviewed and considered the outstanding mitigation proposals as submitted.

In general, mitigation should be related to specific, identifiable impacts of the project, and the mitigation measures should be directly related to the scale and scope of that impact. The identification of general or speculative impacts should be avoided, as should open ended mitigation commitments that are unclear in both their impact and cost. While all parties share a concern to mitigate negative impacts of the project, we also share a responsibility to be responsible stewards of the public transportation resources allocated for the project.

On the specific proposals:

1. City Historic Preservation Program - FTA believes this is not an eligible expense as it is too broad in scope and unclear in impact.
2. Main Street Program - Appropriate where project funds are provided for very specific revitalization projects where adverse impacts on the historic business district or buildings have been identified and where the revitalization cost is roughly commensurate with the adverse impacts of the project.
3. Restoration of Historic Irwin Park - Some element of the restoration could be considered if directly related to the impact of the project on the park. A restoration effect could also be related to the mitigation of project impacts on other parks in the same general area.
4. Rehabilitation Fund for Historic Resources - Similar to the Main Street program, this could be appropriate where project funds are provided for very specific revitalization projects where adverse impacts on the historic business district or buildings have been identified and where the revitalization cost is roughly commensurate with the adverse impacts of the project.
5. Architectural Historian on TOD/Planning Staff - An architectural historian should be employed, either by the City or the City's contractor, during final design and construction. If employed by the City, this individual may be employed to work on historic resources issues related to development that occurs in station areas where the project is having an adverse effect. However this position would terminate with the completion of project related activities.
6. Preservation/restoration outside the APE - The APE should have been drawn broadly enough to capture impacts. As noted above, some project resources may be applied in specific cases such as the preceding case of the use of the Architectural historian.

FTA encourages all parties to continue the consultation process and to work to further clarify specific impacts and to develop creative and directed mitigation solutions that are clearly and proportionally related to the project impacts. We look forward to the discussion at the next meeting.