Ms. Laura Thielen, State Historic Preservation Officer
Department of Land and Natural Resources
State Historic Preservation Division
Kakuhihewa Building, Room 555
601 Kamokila Blvd.
Kapolei, Hawaii 96707

Attention: Ms. Nancy McMahon, Deputy State Historic Preservation Officer

Dear Ms. Thielen:

Subject: Honolulu High-Capacity Transit Corridor Project
Revision of Section 106 Eligibility and Effect Determinations.

Recently, the Honolulu High-Capacity Transit Corridor Project (Project) Section 106 consulting parties presented the Federal Transit Administration (FTA) with information regarding proposed management boundaries identified in the Navy's Oahu Integrated Cultural Resources Management Plan (ICRMP), which was updated in October 2008. In the ICRMP, the Makalapa Housing and Little Makalapa Housing areas are grouped into a single management district or zone. The FTA in its Section 106 eligibility determination, which included consultation pursuant to Section 106, found the two districts to be eligible for listing in the National Register of Historic Places (NRHP) as two separate historic properties. This determination was based on recommendations by the Project's third-party consultant based on, among other things, distinct architectural features and uses (civilian vs. officer housing) and natural and manmade features that separate the housing areas (e.g., Radford Drive). The State Historic Preservation Officer (SHPO) concurred with that finding by letter dated October 3, 2008 (attached).

By letter dated November 23, 2009, the National Trust for Historic Preservation (NTHP) expressed concerns that the boundaries for the Project's Determinations of Eligibility should match the ICRMP management boundaries. Based on NTHP's concerns, FTA consulted further with the SHPO. During this additional consultation period, it was clarified that the ICRMP is a management document, which serves a different purpose from the boundaries for Section 106 determinations of eligibility. On January 25, 2010, based on the additional consultation, the Navy submitted a letter (attached) to the City and County of Honolulu explaining its position. In the letter, the Navy states that it does not disagree with the existing determination of eligibility completed as part of the Project, which identifies Makalapa Housing and Little Makalapa Housing as two separate districts eligible for listing in the NRHP. Furthermore, the Navy agrees that the character of the two districts has changed for the reasons described above.

As a result of this coordination, the FTA reconfirms the designation of separate boundaries for the Makalapa Housing and Little Makalapa Housing historic districts that were determined through the Section 106 process and the concurrence of the SHPO by letter dated October 3, 2008 (attached). FTA also reconfirms the prior determination of adverse effect to the Makalapa Housing Historic District and determination of no adverse

effect to the Little Makalapa Housing Historic District with the concurrence of SHPO by letter dated July 22, 2009 (attached).

Sincerely,

Leslie T. Rogers
Regional Administrator

Attachments:
Letter from SHPD to City dated October 3, 2008
Letter from Navy to City dated January 25, 2010
Letter from SHPD to City dated July 22, 2009

cc: Ms. Blythe Semmer, Advisory Council on Historic Preservation [email]
Dr. Pua Aiu, State Historic Preservation Division [email]
Commander Lore Aguayo, Naval Station Pearl Harbor [email]
Mr. Toru Hamayasu, City and County of Honolulu DTS [email]