From: Matley, Ted (FTA)
To: Bausch, Carl (FTA); Ossi, Joseph (FTA); Barr, James (FTA); Sukys, Raymond (FTA)
Sent: 9/2/2009 7:42:28 AM
Subject: FW: Honolulu Rail Section 106 PA
Attachments: HonoluluTransit_PotentialMitigationMeasures_1Sept09.doc

It appears the NPS is endorsing a more expansive view of impacts and mitigation than we are.

From: Miyamoto, Faith [mailto:fmiyamoto@honolulu.gov]
Sent: Tuesday, September 01, 2009 7:09 PM
To: Matley, Ted (FTA)
Subject: Honolulu Rail Section 106 PA

Hi Ted –

In case you are having a problem opening up the attachment, here it is.

Faith

From: Elaine_Jackson-Retondo@nps.gov [mailto:Elaine_Jackson-Retondo@nps.gov]
Sent: Tuesday, September 01, 2009 3:49 PM
To: Ted.Matley@dot.gov; Miyamoto, Faith
Cc: jeff@n-architects.com; kiersten@historichawaii.org; amy@aiahonolulu.org; katie@historichawaii.org; keabad@ksbe.edu; keolal@oha.org; sherry_campagna@hotmail.com; pua.aiu@hawaii.gov; malamapono@aol.com; lani@aukahi.com; nancy.a.mcmahon@hawaii.gov; Elaine_Jackson-Retondo@nps.gov; bsemmer@achp.gov; brian_turner@nthp.org; susan.y.tasaki@hawaii.gov; Betsy_Merritt@nthp.org; Spurgeon@pbworld.com; john.muraoka@navy.mil; pamela.takara@navy.mil; Spencer Leineweber
Subject:

Faith,

Consulting parties to the Section 106 consultation have worked together to identify a consolidated list of mitigations that would be appropriate for the adverse effects of the Honolulu High Capacity Corridor Project. During these discussions, we found that there also ae some questions that we needed FTA or the City to answer so that we all can have a better understanding and be in agreement about where we are in the consultation process , the schedule forward, and the FTA's approach to avoidance, minimization and mitigation. We have included these questions at the end of this email.

The information sent to consulting parties yesterday evening (August 31, 2009) starts to answer some of the questions and you have a provided a table that summarizes mitigation requests from consulting parties and includes whether or not FTA has included the mitigation in the programmatic agreement. Thank you for providing this summary.

We thought that it might be helpful if we articulated why additional mitigation is needed and why the type of mitigation that we have proposed is appropriate to the adverse effects of the project.

The negative impacts of the Honolulu High Capacity Corridor Project will forever diminish the cultural landscape of Oahu and diminish the civic understanding, experience and appreciation for aspects of Oahu's historic areas. The project's adverse effects to the design, setting, feeling and association of multiple historic properties throughout Oahu perhaps most directly affects the public's ability to appreciate the imprint of history on the Oahu landscape. Most of the mitigations that the FTA and the City have proposed thus far document the history and make it available to researchers and scholars. The project team also needs to include mitigations that are immediately available to the citizens of and visitors to Oahu. These mitigations should focus on how to improve the public's awareness and ability to appreciate the historic areas that are left along the route as well as raise the awareness of the historic sites that were impacted in the construction. We are suggesting mitigation that could accomplish this goal that go beyond what is already being proposed in the PA. Perhaps FTA,

the City, and other consulting parties have additional or other suggestions to address these impacts.

To facilitate further discussion of possible mitigations, these suggestions are consolidated in the attached table. We would like to discuss these mitigations at tomorrow's meeting. The attached table of proposed mitigations was compiled from input by the Historic Hawaii Foundation, the National Trust for Historic Preservation, the Honolulu Branch of the American Institute of Architects and the National Parks Service, Pacific West Region. The table is divided into four categories: mitigation for cumulative direct impacts; mitigation for cumulative indirect impacts, mitigation for site/property specific direct impacts and mitigation for site/property specific indirect impacts. Mitigation that is currently included in the draft PA is in a red-colored font, in some instances we have proposed further discussion of mitigation already included in the PA. We think this table can be a starting point for continued discussion of possible mitigation measures.

The discussions that produced the attached table were in response to the adverse effect on above-ground resources. It is likely that there will be a need for additional discussion, consultation, and mitigation for burials, archeological finds, and traditional cultural properties. Their absence from this particular discussion and from the attached table in no way indicates a lack of concern or FTA responsibility mitigating impacts to those additional resources.

Consolidated Questions for FTA and City:

WHAT IS THE SECTION 106 CONSULTATION SCHEDULE FROM THIS POINT FORWARD AND CAN YOU PROVIDE A FLOW DIAGRAM OR CAN YOU LAYOUT THE NHPA, NEPA AND 4(F) SCHEDULES BESIDE ONE ANOTHER?

WHAT IS THE STATUS OF THE SIGNATORIES (IE: WILL THE CITY BE AN INVITED SIGNATORY AND WHAT IS THE STATUS OF THE OAHU BURIAL COUNCIL?

WHAT IS FTA'S APPROACH TO AVOIDANCE, MINIMIZATION AND MITIGATION?
THE TERM DIRECT MITIGATION HAS BEEN USED BY THE AGENCY'S APPLICANT. HOW DOES FTA DEFINE DIRECT MITIGATION?

WHAT ARE SOME POSSIBLE NON-DOCUMENTATION MITIGATIONS?
WHAT IS THE STATUS OF/SCHEDULE FOR COMPLETING 4(F)?

Regards,
Elaine

Elaine Jackson-Retondo, Ph.D.
National Register & National Historic Landmarks Program
National Park Service . Pacific West Regional Office

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