

In your letter of December 31, 2009, the Honolulu Department of Transportation Services (DTS) staff put forward several statements in support of the identification of two separate Makalapa Housing historic districts in the environmental documents related to the Honolulu High Capacity Transit Corridor Project. While it is correct that the Draft Environmental Impact Statement (DEIS) and the Administrative Draft Final Environmental Impact Statement (AFEIS) (October 2008) documents identified two Makalapa Housing historic districts. However, during the Section 106 Consultation various 106 conferees including the Navy and the National Trust for Historic Preservation pointed out that the DEIS and the AFEIS are in error regarding the designation of the historic districts.

The Navy's Integrated Cultural Resources Management Plan (ICRMP) published in 2002 does not distinguish between the Little Makalapa and the Navy Makalapa Housing areas. The official Navy map depicts one, single historic zone called the Makalapa Housing Zone (see attached map). The Federal Transit administration (FTA) agrees that the DEIS and AFEIS are in error. The entire Historic Makalapa Housing Zone, as depicted in the ICRMP must undergo Section 106 and Section 4(f) evaluation in the Environmental Impact Statement document. This position was further articulated by FTA staff during the January 6, 2010 conference call in which DTS staff participated. On that call both the Navy and the Hawaii State Historic Preservation Officer expressed support for FTA's position.

Therefore, the proposed elevated station touchdown area would be located within the Historic Makalapa Housing Zone, and the one, single historic zone is within the area of potential effect. In coordination with Navy and SHPD staff, please amend the determination of eligibility accordingly. If necessary, amend the historic effects determination and the Historic Effects Report. Keep in mind that if there is a no adverse effects determination by the SHPO in consultation with Navy based on this new proposed determination of eligibility, then FTA may make a *de minimis* determination on the site for Section 4(f) compliance. When agreement is reached on impacts, measures to minimize harm, etc., please also modify the AFEIS accordingly and we will similarly modify the draft 106 Programmatic Agreement.

Should you have any questions, please contact Ted Matley at (415) 744-2590.