

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

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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

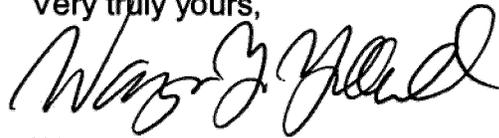
distinct areas for both the Makalapa Navy Housing and the Little Makalapa Navy Housing. It is the City's understanding that the boundary shown in the 2002 ICRMP has not been formally determined by the U.S. Navy to be eligible for listing on the National Register of Historic Places under Section 106, 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



DEPARTMENT OF THE NAVY
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Mr. Wayne Yoshioka
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813

Dear Mr. Yoshioka:

Thank you for your letter dated December 31, 2009 regarding the Honolulu High-Capacity Transit Corridor Project (Transit Project). The Navy firmly believes a rail station for Joint Base Pearl Harbor Hickam is essential to serve our Sailors, Airmen, and civilian professionals. The Navy's preferred location for this rail station remains the intersection of Kamahameha Highway and Radford Drive as currently proposed.

The Navy's Integrated Cultural Resources Management Plan (ICRMP) provides guidelines for the appropriate treatment of cultural landscape features, buildings, and structures. It looks at ways to integrate the guidelines into the Navy's project and program planning process. While the ICRMP does aid in assessing Navy property eligibility for the National Register of Historic Places, the maps and descriptions contained in the ICRMP should not automatically be assumed to indicate a specific historic or cultural significance.

The Navy's ICRMP for the Pearl Harbor Naval Complex has depicted a single Makalapa Housing Zone, with two distinct sub-areas, since 2002. This resource was available to the City as a publicly available document, and is also well known to the City's agents as the City and Navy share the same historic consultant. On the City's consultant's recommendation, the City chose to evaluate the two housing areas as separate districts rather than a single Makalapa Housing Zone. The Navy does not disagree with the approach taken by the City.

Mason Architects, Inc. (MAI), historic consultant for both Navy and the City, considers the Makalapa Housing area to consist of two separate contributing sub-areas, Makalapa and Little Makalapa, with a small open space and a major thoroughfare, Radford Drive, running between the two areas. Each sub-area is bordered by mature trees and rock croppings that are a remnant of the physical crater land forms. These two distinct sub-areas are spatially and physically separated by natural topography and vehicular circulation. Additionally, MAI feels that although the two housing areas were built about the same time, the housing types are different and the housing areas originally had different populations, with Little Makalapa housing civilians and the Makalapa housing Naval officers. A major thoroughfare exists dividing

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the two housing sub-areas, and the open area where the station will touch down is bordered very closely by Kamehameha Highway to the west, the H-1 Freeway to the east, and Radford Drive to the north. The ICRMP states that the construction of both the H-1 Freeway and Radford Drive has changed the character of the area between the two housing sub-areas. The Navy agrees with MAI's views.

The City has determined that the proposed rail station will have "no adverse effect" on Little Makalapa Housing. The State Historic Preservation Office has concurred with this determination. The Navy has not objected to this determination during previous reviews, nor does it object today.

The Navy feels strongly about its duty to protect and showcase the greater Pearl Harbor National Historic Landmark. Surrounded by historic sites, Navy would like to see this rail station's design and appearance honor the history and architecture of the Landmark in a manner to be appreciated by the entire ridership. Navy would like City's commitment to full partnership to accomplish this objective.

The Navy looks forward to substantial interaction with the City, Federal Transit Administration, and other stakeholders in further advancing progress on the Transit Project. Navy point of contact is CDR Lore Aguayo, at 471-2647.

Sincerely,



R. W. KITCHENS
Captain, U.S. Navy
Commanding Officer

Copy to: US Federal Transit Administration, Mr. Ted Matley
PB Americas, Inc., Mr. Lawrence Spurgeon
State of Hawaii Historic Preservation Office, Ms. Nancy McMahon