

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**

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TPD06-00196

April 25, 2006

(23)  
Ms. Kiersten Faulkner, Executive Director  
Historic Hawaii Foundation  
680 Iwilei Road, Suite 690  
Honolulu, Hawaii 96817

Dear Ms. Faulkner:

Subject: Honolulu High-Capacity Transit Corridor Project

Thank you for your March 14, 2006 letter to Mason Architects, transmitting your comments about the proposed methodology to address the historic issues that will arise for the Honolulu High-Capacity Transit Corridor Project. We are very concerned about your statement that the "chronology of events is fatally flawed".

The planning process for the Honolulu High-Capacity Transit Corridor Project fully complies with the spirit and letter of the National Environmental Policy Act (NEPA) and Hawaii's Environmental Impact Statement (EIS) Law (Chapter 343, Hawaii Revised Statutes). Both processes have been formally invoked, and all coordination that is now occurring, including our exchange of correspondence, is helping to build the administrative record for the project. The project's Environmental Impact Statement Preparation Notice (EISPN) was published in the OEQC Environmental Notice on December 8, 2005, and the Notice of Intent to prepare an EIS was published in the Federal Register on December 7, 2005. NEPA scoping and the public review of the EISPN formally concluded in January 2006, but we are continuing to listen to input we receive from all parties.

The proposed process of using an Alternatives Analysis (AA) to review and narrow a wide range of alternatives to a smaller set with merit is the process typically undertaken for U.S. Department of Transportation (DOT) Federal Transit Administration (FTA) projects. Development of an AA Report is a technique that has been developed over time to perform sufficient analysis of a

range of alternatives more quickly and efficiently than carrying a large number of alternatives into a draft EIS (DEIS). The purpose of an AA is to compare and contrast alternatives against a range of the most important evaluation criteria. While an AA need not address all of the content requirements of a DEIS, a properly-performed AA will crystallize all relevant issues and provide sufficient information for an evaluation of alternatives meriting further study.

The DEIS that will be prepared subsequent to the selection of a Locally Preferred Alternative (LPA) by the City Council must address the No-Build and Transportation System Management (TSM) alternatives, along with the alternative(s) that the City Council selects as the LPA. Because the DEIS will include a balanced assessment of the LPA, No-Build and TSM alternatives, the DEIS process will not “rubber-stamp decisions”. The AA process is very similar to the Major Investment Study process that had been widely used by U.S. DOT in the past. For a more complete understanding of the AA process, please review the following document from FTA’s website:  
[http://www.fta.dot.gov/grant\\_programs/transportation\\_planning/major\\_investment/technical\\_guidance/10049\\_15635\\_ENG\\_HTML.htm](http://www.fta.dot.gov/grant_programs/transportation_planning/major_investment/technical_guidance/10049_15635_ENG_HTML.htm)

The Honolulu High-Capacity Transit Corridor Project AA is being completed within the NEPA and Chapter 343 processes and will be part of the project’s administrative record. The results of the AA will be used to establish both the alternatives considered but rejected and the alternatives analyzed in the DEIS. The AA exactly accomplishes several of the goals you have identified. The AA is the first step in the iterative process of alternative development, impact identification, and design refinement. Impacts will be identified during the AA phase, and considered by the City Council when selecting the LPA. The City Council also will hold public hearings to solicit comments on the alternatives under consideration.

The historic resources review being undertaken as part of the AA will be used, along with studies of other environmental and community effects, transportation benefits, and costs when disclosing the merits and adverse impacts of each alternative to the City Council. The City Council will then select the LPA, which may include one or more options to be evaluated further in the DEIS along with the No-Build and TSM alternatives. The additional historic resource analysis that will be undertaken during preparation of the draft EIS include the elements of analysis that you have outlined. In addition, it will support development and refinement of the alternative(s) that will

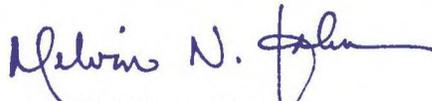
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constitute the project as defined in accordance with Section 106 of the Historic Preservation Act.

We hope that this clarification of the planning process we intend to follow alleviates your concerns. Should you have any additional questions regarding this matter, please contact Ms. Faith Miyamoto of the Transportation Planning Division at 527-6976.

Sincerely,



MELVIN N. KAKU  
Acting Director

cc: Ms. Melanie Chinen  
Hawaii State Historic Preservation Division

Ms. Polly Cosson  
Mason Architects

Mr. Lawrence Spurgeon  
PBQD

mb (F. Miyamoto)





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## Historic Hawai'i Foundation

Via email to Polly Cosson [[pc@masonarch.com](mailto:pc@masonarch.com)]

March 14, 2006

### **RE: Honolulu High-Capacity Transit Corridor Project Historic Resources Inventory Methodology Report**

Dear Ms. Cosson:

Thank you for providing information on the planned methodology for the Historic Resources Inventory for the Honolulu High-Capacity Transit Corridor Project. I have reviewed the methodology report and I am concerned about some of the basic assumptions for the Project.

The methodology indicates that an inventory of historic resources is to be prepared, which will be used in an alternatives analysis, which will lead to selection of a Locally-Preferred Alternative. That alternative will then be taken into a formal environmental analysis as required by the National Environmental Policy Act (NEPA), including review of impacts to historic properties as required by Section 106 of the Historic Preservation Act.

**This chronology of events is fatally flawed.** NEPA is not to be used to rubber-stamp decisions that are already made. It is to gather all relevant information, disclose and evaluate it, and use it as a basis for sound decision-making that weighs all potential impacts and benefits. The proposed methodology leads to a decision prior to gathering relevant information and then tries to justify that decision through later processes. This is an unacceptable attempt to circumvent the data-gathering and analysis phase of NEPA, which is to occur prior to decision-making. This process does not capture or evaluate potential impacts that would arise from certain actions. Neither does it allow for eliminating an action alternative that has egregious impacts; it merely allows for potential mitigation of those impacts at a later stage. A full inventory of resources, and an evaluation of the potential impacts, is also difficult without knowing the transit technology, station locations or auxiliary land uses (potential development and parking, primarily). Typically, the alternatives and analysis are iterative so that as more information is known, the impacts and mitigation can be captured, which leads to refined alternatives. The proposed process leads to a path that will be difficult to adjust as new information is available.

If the Honolulu High-Capacity Transit Corridor Project management team is determined to follow this ill-advised process, then the elements of that process have an increased duty to be thorough. While the methodology outlined for the historic resources inventory could be acceptable for a baseline survey, it is not acceptable as an historic analysis to be used for determining a Locally-Preferred Alternative. Given the purpose for which the inventory will be used, I strongly urge a more complete study and evaluation. Simply listing the buildings along a potential route, along with a preliminary determination of potential eligibility as historic landmarks, cannot substitute for a preservation analysis or recommendations.

Elements of a more thorough preservation analysis should include:

- An inventory of buildings as described in the methodology report;
- Context studies of the subdivisions and housing tracts, particularly those built after WWII. This is a critical piece of understanding the historic significance of the potentially-impacted areas. Very little research has been done on the development patterns and forms of tract housing and subdivisions of the 1950s and 1960s. Context studies should evaluate how these developments relate to the planning and urban design movements of that era; if they contain exemplary examples of architecture, landscape architecture or historic themes; if they are associated with significant developers, architects or historic persons; or if they demonstrate pioneering construction methods. The context studies will provide basic information about when these neighborhoods were developed, how they started, how they fit with the urban growth patterns of Honolulu and broader historic themes of suburbanization of America. This will help determine potential historic significance and integrity at a level much deeper than mere age of structures. To determine impacts, we need to understand these neighborhoods and how they fit with recent history;
- An inventory of other historic resources, including view sheds, structures, archeological sites, cultural landscapes, and potential historic districts, which derive their significance from overall integrity rather than individual building merit;
- Evaluation of the architectural, historic and geographic significance of buildings, sites, districts, cultural landscapes, view sheds and other historic resources;
- Characterization and quantification of potential impacts from the action and no-action alternatives, including cumulative impacts;
- Evaluation of avoidance options as well as minimization and mitigation options;
- Recommendations for eliminating or revising the action alternatives to avoid, minimize or mitigate impacts; and
- Use of the historic resources report, along with studies of environmental and community impact analysis, when narrowing the action alternatives.

Historic Hawaii Foundation will continue to be involved in the public process for this project. I will be happy to review reports and alternatives or to assist in other ways as needed. Please contact me at 808-523-2900 or [Kiersten@historichawaii.org](mailto:Kiersten@historichawaii.org) if you have any questions.

Very truly yours,



Kiersten Faulkner  
Executive Director