
From: Miyamoto, Faith
To: Raymond.Sukys@dot.gov; Ted Matley (Ted.Matley@dot.gov)
CC: Simon Zweighaft (zweighaft@InfraConsultLLC.com); Susan Robbins; vanepps@pbworld.com; Hamayasu, Toru
Sent: 4/21/2008 12:41:45 PM
Subject: NEPA issues for Honolulu Transit Project

Aloha Ray and Ted,

Thank you for offering to set-up a discussion of unique 4(f) issues on the Honolulu project. The majority of 4(f) concerns are related to historic resources. The following FTP links are to corridor maps of Historic Resources, and to detail maps of the individual 4(f) resources of concern.

<https://ftp.pbworld.com/GetFile.aspx?fn=1251658243.zip>

<https://ftp.pbworld.com/GetFile.aspx?fn=545746583.zip>

<https://ftp.pbworld.com/GetFile.aspx?fn=880275279.zip>

<https://ftp.pbworld.com/GetFile.aspx?fn=412832286.zip>

As a bit of background, remember that we are addressing 3 build alternatives in the EIS that vary by alignment in the vicinity of the Airport. All 3 alternatives include both a "First Project" (previously MOS) that would be built with anticipated funds, and extensions that would be built at a later date. The EIS is covering the complete alternatives, including the extensions. Right-of-way and displacements are being identified for the entire project, including unfunded extensions.

We have been coordinating with the local State Historic Preservation Division (SHPD in Hawaii). While no official submittals of eligibility forms have yet been made, we have reviewed proposed eligibility with them, and believe that the eventual concurrence of SHPD will be very close to the proposed list. In summary:

- Evaluated 953 individual resources and four potential districts in APE for eligibility (1,033 total).
- 149 resources found on or eligible for NR.

Discussion with SHPD has indicated that it is their belief that adding an elevated guideway would have a global adverse effect on setting to historic resources in the APE. Following their guidance, there would be an adverse effect to 136 of the 149 resources. Of the 136, 109 would be located outside of future right-of-way and affected only by the visual change to setting from the guideway. In the past month, avoidance design has removed 18 parcels with historic resources from the list of right-of-way needs.

Twenty-seven parcels currently remain (we are still working on avoidance options for a few of them) on the list of parcels from which right-of-way is needed. They are of concern for 4(f). The following bullets summarize the issues, with more detail following:

- Eight Bridges – Project would pass-over but not touch.
- Historic OR&L rail line, street pavers, and lava curbs - Also cross above, but not touch.
- OR&L Station – within existing transit easement through parcel. State plans to develop parcel.
- Street Trees (Dillingham and Kapi'olani Boulevards)
- Both strip takes and displacements on Dillingham Boulevard (5)
- Chinatown Station in parking lot
- Downtown Station - Dillingham Transportation Building and HECO Plant Downtown
- AAxion Adult Video (Extension)
- SHPD Adverse position on 3 resources in PH Naval Base (setting) - Airport Alignment would put station on base lands as coordinated with Navy. No physical use of resource, but use of land in the same parcel (entire base).
- Kalaeloa (Kapolei Extension) Proposed WW II historic housing district and quarters - Derelict, HCDA plans demolition. Project follows HCDA road alignment, directly through several buildings.

Specifics on Section 4(f) Issues for Discussion with FTA

Future Development Area

The guideway in the Kapolei/Ewa area will follow a roadway network that is expected to be in place before the transit project is

constructed and some NR listed or eligible sites are expected to result in a use. However, it is the future roadway system that will require the acquisition. How should the Section 4(f) evaluation address this issue?

Historic Districts

Following existing rights-of-way, the guideway would travel through several historic districts where an adverse effect under Section 106 is assumed. A few individual properties within historic districts would result in a use and separate 4(f) analyses will be prepared. However, it is expected that the guideway would travel through the historic district in an existing transportation corridor and it could be used without substantial impairment of activities, features, or attributes that contribute to the NR eligibility. What level of documentation is needed? Must each district include an individual discussion on avoidance alternatives or can the historic districts be grouped with a more general discussion on avoidance and minimization?

Historic Bridges

The guideway would cross-over (not acquire property) several historic bridges, changing their overall setting and possibly resulting in an adverse effect under Section 106, but with no direct use or substantial impairment of activities, features, or attributes that contribute to the NR eligibility. Must each bridge include an individual discussion on avoidance alternatives or can they be grouped with a more general discussion on avoidance and minimization?

These are the major issues that we would like to discuss with you as soon as possible. Would a conference call on Wednesday, April 23rd be possible? Please let me know and we can coordinate call. Thanks.

Faith Miyamoto
Department of Transportation Services
City & County of Honolulu
(808) 768-8350
fmiyamoto@honolulu.gov