

# HISTORIC HAWAII FOUNDATION

December 10, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street  
Honolulu, Hawai'i 96813

**RE: Honolulu High-Capacity Transit Corridor Project,  
Review of Draft Environmental Impact Statement (EIS)/Section 4(f) evaluation**

Dear Mr. Yoshioka:

Thank you for referring the above-mentioned project to Historic Hawai'i Foundation (HHF) for review and comment under the National Environmental Policy Act (NEPA) and Section 4(f) of the Department of Transportation Act, 49 USC §303. HHF previously reviewed and provided comments on the Historic Resources Technical Report (September 15, 2008) as a consulting party to the review process under Section 106 of the National Historic Preservation Act (NHPA), pursuant to 36 CFS §800.2.(c)(5) and 800.3(f)(3).

HHF also notes that the Department of Transportation Services has provided notice that it intends to use the process and documentation prepared under NEPA in order to comply with its NHPA Section 106 obligations. HHF shares the concerns raised by the National Trust for Historic Preservation in its letter of Oct. 3, 2008 about combining the two processes. We look forward to the response from the federal agencies and Advisory Council on Historic Preservation to address the propriety of this proposal and the circumstances under which it would be appropriate.

The proposed Honolulu Transit Corridor project will have a dramatic impact on the landscape of the island of O'ahu; this includes not only the direct impact to specific parcels, but primarily the visual effect on the landscape and historic resources. HHF is concerned that the Draft EIS does not accurately take into account these larger impacts, but rather focuses on those adverse effects caused by the direct taking of land.

As indicated in 36 CFR 800.16(i), effect means "alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register." The following activities constitute an adverse effect: physical destruction of or damage to all or part of the resource; alteration of a resource, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary of Interior's standards for the treatment of historic properties; removal of the resource from its historic location; change of the character of the resources' use or of physical features within the setting that contribute to its historic significance; introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic feature; or neglect of a property that causes its deterioration, except where such neglect and



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deterioration are recognized qualities of a property of religious and cultural significance (emphasis added).

Table 4-32 of the draft EIS lists properties preliminarily determined eligible for listing on the National Register of Historic Places. Of these, only seven individual structures were determined to be adversely effected by the proposed project. This assessment is unacceptable, as in a large number of cases the “introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features” will occur. It is crucial that these impacts are recognized and properly mitigated.

For many of those properties for which it was determined that there will be “no effect” or “no adverse effect,” Table 4-32 indicates the description of the effect as “no property acquisition.” This determination is in error. The mere fact that either no property acquisition or only a minor acquisition occurs does not mean that there is “no effect” or “no adverse effect.” The dramatic visual change and impact to view sheds caused by the presence of the guideway and rail stations does in fact constitute an adverse effect.

It is vital that direct, indirect and cumulative impacts to districts, bridges, view planes, and individual structures as a result of the presence of the guideway and rail stations are acknowledged and properly identified as adverse effects. Table 4-10 acknowledges that visual impacts exist; it needs to be further acknowledged that, where historic resources are present, these impacts likely constitute an adverse effect.

HHF also has serious concerns regarding the evaluation of Pearl Harbor as historic resource. Page 4-59 discusses visually sensitive resources. The paragraph discussing landmarks should differentiate designated National Historic Landmarks (NHL)—which are of extreme importance to our nation’s history—from visual landmarks such as parks and open space. The draft EIS does not do so, thus downplaying the significance of the Pearl Harbor NHL. The sentence of greatest concern reads, “Pearl Harbor is considered a historical landmark because of the part it played in the island’s history.” This is an egregious understatement regarding Pearl Harbor, the bombing of which brought the United States into World War II. It has great significance both to the Nation and to the world for its extreme importance that reaches far beyond its history at a state level. The fact that Pearl Harbor is a designated NHL of great importance to the nation should be clearly stated in the draft EIS.

The visual effects to each area that the transit line will pass through are evaluated in Table 4-10. For the Pearl Harbor segment, the Draft EIS indicates that the visual impact will be moderate, but states that “the guideway would dominate the linear view corridor above the highway. However, Kamehameha Highway is a major transportation corridor and visual effects would not be substantial.” While Kamehameha Highway is a substantial roadway, its impact is nowhere near that of a 60-foot high guideway. Thus, the impact to historic view planes and the character of the National Historic Landmark (NHL) will be high.

We have additional concerns about the assessment of some of the other visual impacts of the project, especially in the Chinatown areas, where in some cases the impact is only listed as moderate. For the view from Maunakea Street looking ma kai, for example, the draft EIS indicates that the



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existing visual quality is high and that the impact would be moderate, even though the assessment of the impact reads: “the guideway and columns would be prominent features in the ma kai views of Honolulu Harbor, partially blocking views of the sky.” The EIS should acknowledge the high level of impact, especially given the fact that Chinatown is both listed on the National Register of Historic Places and is designated by the City and County of Honolulu as a Special Design District.

The Honolulu special design district guidelines indicate that there are certain view planes from Chinatown to Honolulu Harbor that are significant and should be preserved. One of the objectives of the district is “to retain ma kai view corridors as a means of retaining the historic link between Chinatown and the harbor.” In addition to the visual impact that the transit line will have on the district, it will also impact this historic visual link. For both of these reasons, the project constitutes an adverse effect on the Chinatown District.

In regards to former Naval Air Station Barber’s Point, previous documentation in the Historic Resources Technical Report indicated that resources at this site were determined eligible for listing on the National Register. However, these resources have not been included in Table 4-32 listing the historic properties within the Area of Potential Effect (APE). HHF deferred to the State Historic Preservation Division (SHPD) on determinations of eligibility. Please provide an explanation for the changed circumstances that led to a different determination of eligibility for these resources.

The State Historic Preservation Division’s letter of September 26, 2008 stated that additional consideration should be given to resources at former Marine Corps Air Station ‘Ewa Field. This was not done in this draft EIS. Five sites at Pearl Harbor were recently designated by President Bush as part of the Valor in the Pacific National Monument. Though not officially part of the monument, Barbers Point (Kalaeloa), which was also attacked on December 7, 1941, was one of twelve sites nationwide that received official recognition for its importance of telling the story of World War II in the Pacific. Given its extreme importance and proximity to the transit line, it should be further evaluated.

In previous correspondence, HHF suggested potential measures to mitigate impacts to historic resources from this undertaking. A commitment to providing the mitigation measures, including timelines and responsible parties, needs to be complete as part of the final EIS and made part of the Record of Decision, in addition to any Section 106 documentation.

Since 1974, Historic Hawai‘i Foundation has been a statewide leader for historic preservation. A non-profit, membership-based organization, HHF’s mission is to preserve and encourage the preservation of Hawai‘i’s historic buildings, sites, objects and communities.

Thank you for the opportunity to comment. We look forward to the opportunity to discuss the proposed project, the impacts to historic resources and appropriate mitigation efforts.

Very truly yours,



Kiersten Faulkner, AICP  
Executive Director



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Copies (via email)

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Pua Aiu, Administrator, State Historic Preservation Division

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