

HONOLULU HIGH-CAPACITY  
TRANSIT CORRIDOR PROJECT

Draft Environmental Impact Statement/  
Section 4(f) Evaluation

Appendix D:  
Record of Agency Correspondence and  
Coordination

November 2008



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## **Delegation of Authority Letters**

TP158681



U.S. Department  
of Transportation  
Federal Transit  
Administration

REGION IX  
Arizona, California,  
Hawaii, Nevada, Guam

201 Mission Street  
Suite 1650  
San Francisco, CA 94105-1839  
415-744-3133  
415-744-2726 (fax)

JUN - 6 2006

Mr. Peter T. Young  
State Historic Preservation Officer and Chairperson  
Department of Land and Natural Resources  
State Historic Preservation Office  
Kakuhihewa Building, Room 555  
601 Kamokila Blvd.  
Kapolei, Hawaii 96707

JUN 13 9 41 AM '06  
DTS  
TRANS PLANNING

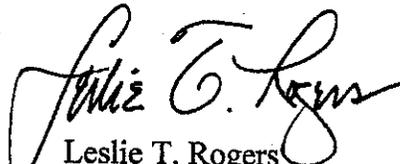
Re: Honolulu High-Capacity Transit Corridor  
Delegation of Authority

Dear Mr. Young:

The Federal Transit Administration (FTA) is the lead Federal agency on the City and County of Honolulu, Department of Transportation Services (DTS) High-Capacity Transit Corridor Project. DTS is responsible for implementing activities associated with the project including compliance with historic preservation act regulations. FTA has delegated DTS the authority to work directly with your office on FTA's behalf, pursuant to 36 CFR 800.3-800.4. We understand that FTA remains legally responsible for all findings and determination pursuant to 36 CFR 800. We request your agreement with this delegation.

If you have questions, please call Donna Turchie of the Office of Planning and Program Development at (415) 744-2737.

Sincerely,

  
Leslie T. Rogers  
Regional Administrator

cc: Kenneth Hamayasu, DTS

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LINDA LINGLE  
GOVERNOR OF HAWAII



PETER T. YOUNG  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT

ROBERT K. MASUDA  
DEPUTY DIRECTOR

DEAN A. NAKANO  
ACTING DEPUTY DIRECTOR - WATER

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
BUREAU OF CONVEYANCES  
COMMISSION ON WATER RESOURCE MANAGEMENT  
CONSERVATION AND COASTAL LANDS  
CONSERVATION AND RESOURCES ENFORCEMENT  
ENGINEERING  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
KAHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

July 24, 2006

LOG NO.: 2006.2536  
DOC NO.: 0607MC02

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DTS  
TRANS PLANNING

Mr. Leslie T. Rogers  
Regional Administrator  
Region IX  
U.S. Department of Transportation  
Federal Transit Administration  
201 Mission Street, Suite 1650  
San Francisco, CA 94105-1839

Dear Mr. Rogers:

**Subject: Honolulu High-Capacity Transit Corridor Delegation of Authority**

This is in response to your June 6, 2006 letter regarding the Honolulu High-Capacity Transit Corridor Delegation of Authority. We agree with your delegation to authorize the City and County of Honolulu Department of Transportation Services (DTS) to work directly with our office on this project.

If there are any questions regarding this project, you may contact Ms. Melanie Chinen of the Historic Preservation Division at (808) 692-8015.

Sincerely,

Peter T. Young, Chairperson  
State Historic Preservation Officer

MC:sy

c: Kenneth Hamayasu, DTS

## **Cooperating Agency Letters**



U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION IX  
Arizona, California,  
Hawaii, Nevada, Guam  
American Samoa,  
Northern Mariana Islands

201 Mission Street  
Suite 1650  
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Lieutenant Colonel Charles H. Klinge  
US Army Corps of Engineers Honolulu District  
Fort Shafter Bldg 230  
Ft. Shafter, HI 96858

**Re: Invitation to be a Cooperating Agency in the Environmental Review Process for the  
Honolulu High-Capacity Transit Corridor Project**

Dear Lieutenant Colonel Klinge:

The Federal Transit Administration (FTA), in cooperation with the City and County of Honolulu, Department of Transportation Services (DTS) is initiating the preparation on a proposal by the City and County of Honolulu to implement a fixed-guideway transit system in the corridor between Kapolei and the University of Hawai'i at Mānoa with a branch to Waikīkī. Alternatives proposed to be considered in the draft EIS include No Build and two Fixed Guideway Transit alternatives.

The purpose of the project, as currently defined, is to provide high-capacity, high-speed transit in the highly congested east-west transportation corridor between Kapolei and the University of Hawai'i at Mānoa, as specified in the 2030 O'ahu Regional Transportation Plan (ORTP). The project is intended to provide faster, more reliable public transportation services in the corridor than those currently operating in mixed-flow traffic, to provide basic mobility in areas of the corridor where people of limited income live, and to serve rapidly developing areas of the corridor. The project would also provide an alternative to private automobile travel and improve transit linkages within the corridor. Implementation of the project, in conjunction with other improvements included in the ORTP, would moderate anticipated traffic congestion in the corridor. The project also supports the goals of the O'ahu General Plan and the ORTP by serving areas designated for urban growth.

The Honolulu High-Capacity Transit Corridor Project proposed improvements likely will require the U.S. Army Corps of Engineers approval related to streams along the alignment, so we are formally requesting the U.S. Army Corps of Engineers to be a cooperating agency. The enclosed scoping information packet provides more details including a preliminary schedule.

FTA seeks the U.S. Army Corps of Engineers' cooperation in coordinating and determining effects of the proposed construction of the build alternatives under study and associated facilities on the Honolulu High-Capacity Transit Corridor Project, including those related to other project alternatives, environmental consequences, and mitigation. You can expect that the EIS will, to the greatest extent possible, satisfy the U.S. Army Corps of Engineers statutory

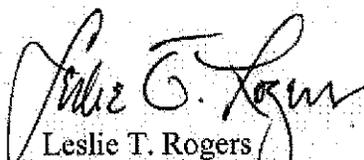
responsibilities and concerns. The environmental documentation will address environmental and programmatic concerns identified by the U.S. Army Corps of Engineers and will be sufficiently detailed to enable the U.S. Army Corps of Engineers to grant necessary permits or other approvals that may ensue from the build alternatives under study. If at any point in the process your needs are not being met, please let us know. We expect that at the end of the process the EIS will satisfy your NEPA requirements.

We are providing a copy of the Federal Register Notice of Intent with this letter. Scoping materials are also available on the project website at <http://www.honolulustransit.org>. The interagency scoping meeting will be held on the following date and location:

- Honolulu Hale, Mission Memorial Auditorium at 558 South King Street, Honolulu, HI 96813 at March 28, 2007 from 10:00 a.m. to 12:00 p.m.

We look forward to your response to this request and your role as a cooperating agency on this project. If you have questions or would like to discuss in more detail the project or our agencies' respective roles and responsibilities during the preparation of this EIS, please contact Mr. Ted Matley at (415) 744-2590 or Mr. Toru Hamayasu of DTS at (808) 768-8344. This contact information supercedes the information provided in the Notice of Intent. A City and County of Honolulu project representative will be contacting your office as the project proceeds.

Sincerely,



Leslie T. Rogers  
Regional Administrator

Enclosures (3):

1. Scoping Information Packet/Schedule
2. Federal Register NOI
3. Draft Coordination Plan

cc: City and County of Honolulu, Department of Transportation Services

TP 203767



DEPARTMENT OF THE ARMY  
U. S. ARMY ENGINEER DISTRICT, HONOLULU  
FT. SHAFTER, HAWAII 96858-5440

REPLY TO  
ATTENTION OF

April 10, 2007

Office of the Chief  
Regulatory Branch

Mr. Kenneth Hamayasu  
Chief, Transportation Planning Division  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

APR 12 3 31 PM '07

TRANSIT DIVISION

Dear Mr. Hamayasu:

This letter is in response to your March 16, 2007 written invitation requesting our participation in the National Environmental Policy Act (NEPA) public scoping process for the preparation of an Environmental Impact Statement (EIS) for the *Honolulu High-Capacity Transit Corridor Project* ("Project") located on the Island of O'ahu, Hawaii. Based on your correspondence, I understand the Federal Transit Administration (FTA) and the City and County of Honolulu, Department of Transportation Services (DTS) will jointly prepare an EIS for this proposal in accordance with NEPA implementing regulations (40 CFR §1500-1508) and pursuant to the State EIS Law (Chapter 343, Hawaii Revised Statutes). The proposed project would implement a fixed guideway transit system in the east-west transportation corridor between Kapolei and the University of Hawai'i at Mānoa with a branch to Waikiki. Alternatives to be considered in the draft EIS include the No Action/No Build and two fixed guideway transit alternatives: one via Salt Lake Boulevard and another serving the Honolulu International Airport plus Salt Lake.

As a Federal agency with jurisdiction by law, the U.S. Army Corps of Engineers (Corps) appreciates your efforts to seek our early involvement and obtain our technical input regarding aquatic resources. I want to take this opportunity to advise the FTA and DTS the proposed Project may require a Corps permit. Enclosed you will find a permit application form and a pamphlet that describes our regulatory program (Enclosure 1). In general, a Corps permit is required for:

a) Structures or work in or affecting "navigable waters of the United States" pursuant to Section 10 of the Rivers and Harbors Act (RHA) of 1899. Examples include, but are not limited to: 1) constructing a pier, revetment, bulkhead, jetty, aid to navigation, artificial reef or island, and any structures to be placed under or over a navigable water; 2) dredging, dredge disposal, filling and excavation;

b) The discharge of dredged or fill material into, including any redeposit of dredged material within, "waters of the United States" and adjacent wetlands pursuant to Section 404 of the Clean Water Act (CWA) of 1972. Examples

include, but are not limited to: 1) creating fills for residential or commercial development, placing bank protection, temporary or permanent stockpiling of excavated material, building road crossings, backfilling for utility line crossings and constructing outfall structures, dams, levees, groins, weirs, or other structures; 2) mechanized land clearing, grading which involves filling low areas or land leveling, ditching, channelizing and other excavation activities that would have the effect of destroying or degrading waters of the United States; 3) allowing runoff or overflow from a contained land or water disposal area to re-enter a water of the United States; 4) placing pilings when such placement has or would have the effect of a discharge of fill material; and

c) Any combination of the above.

In addition, my staff offers the following comments for your consideration as part of the Project's public scoping process. Our comments are provided pursuant to our regulatory authorities promulgated under Section 404 of the CWA and Section 10 of the RHA, and are based on information presented in the *EIS Scoping Information Package for the Honolulu High-Capacity Transit Corridor Project* (dated March 15, 2007), the *Alternatives Analysis Report* (dated November 1, 2006), and the *Notice of Intent to Prepare an EIS for High-Capacity Transit Improvements in the Leeward Corridor of Honolulu* (Federal Register, 72 FR 12254, dated March 2007).

### **Regulatory Scope**

Based on Project maps/figures and our knowledge of existing aquatic resources within the transportation corridor study area, it appears the proposed Project could potentially affect jurisdictional waters of the U.S. As your EIS technical studies and fieldwork progress, we expect that site-specific information regarding the delineation of waters of the U.S. and the characterization of the extent/intensity of potential aquatic resource impacts will assist in defining the scope of the Corps' involvement. Moreover, an estimate of the impacts to waters of the U.S. will help establish the appropriate Department of Army (DA) authorization should the proposed Project, or any of its parts, be regulated under Section 10 of the RHA and/or Section 404 of the CWA. Generally speaking, a discharge of dredged or fill material into waters of the U.S. and/or work in Section 10 navigable waters of the U.S. that complies with the terms and conditions of our nationwide permits, may be authorized in a relatively streamlined timeframe. However, for an activity that does not meet the terms and conditions of our nationwide permits and/or results in more than minimal impacts to the aquatic environment, individually or cumulatively, may instead require review under a more rigorous permitting process (e.g., standard individual permit).

We strongly encourage FTA and DTS integrate all reasonable and practicable measures during the early development of alternatives to avoid and minimize adverse impacts on the aquatic environment to the maximum extent practicable. Ensuring the proposed Project avoids and minimizes impacts to waters of the U.S. will also facilitate future Corps regulatory compliance requirements.

## Purpose and Need

Foremost, the transit service should be responsive to the needs of the population it serves. As Federal and State entities charged with transportation planning, funding and implementation, we give substantial deference to the expertise of FTA and DTS in determining the project needs and purpose(s) for this public transit project. We understand the planning level alternative analysis performed in accordance with SAFETEA-LU led to the identification of a Locally Preferred Alternative (LPA), namely a fixed guideway transit. In the *Alternatives Analysis Report*, the fixed guideway transit alternative considered five transit technologies and four different alignments with varying station locations and numbers, as well as distinct characteristics and environmental impacts. In this regard, the purpose and need statement should clearly describe the relevant factors considered in defining the need and what selection criteria were applied to eliminate certain alignments and other modal alternatives from further consideration. These factors and criteria should be substantiated with existing and future traffic/transit data, including but not limited to: ridership projections, including assumptions related to the projections; savings or reduction in vehicle miles traveled (VMT); savings or reduction in vehicle hours traveled (VHT) for a.m. and p.m. peak periods; and improvements to the volume to capacity (VC) ratio and level of service (LOS). In turn, the Project purpose statement must be articulated in such a manner as to ensure a reasonable range of alternatives can be formulated to address the identified transportation problems (needs).

Page 2-1 of the Project Scoping Information Package indicates the purpose of the project is “...to provide high-capacity, high-speed transit in the highly congested east-west transportation corridor between Kapolei and the University of Hawaii at Mānoa, as specified in the 2030 O’ahu Regional Transportation Plan (ORTP)”. Since the goal is to provide efficient, reliable and effective movement of people between Kapolei and downtown Honolulu/University of Hawaii at Mānoa the inclusion of “high-speed” may arbitrarily or inappropriately narrow the range of practicable alternatives. We recommend you consider some minor modifications to the purpose statement to ensure the Federal NEPA and CWA processes are structured to evaluate a reasonable range of alternatives, which may include multi-modal solutions. By doing so would not preclude or otherwise affect the 2006 selection of your LPA or the City and County Council’s adopted “Minimum Operable Segment” identified in Resolution 07-039 FD1(C). Rather, inclusion of other non-high-speed transit and modal alternatives may provide a clearer and sharper comparison between alternatives for NEPA purposes.

Existing and modeled traffic data from the 2006 Alternatives Analysis Report suggest the implementation of the LPA will not necessarily improve the LOS on most segments of the Interstate H-1 Freeway, including the high-occupancy vehicle and Zipper lanes, within the corridor study area (Tables 3-12 and 3-13, *Alternatives Analysis Report*). For instance, at screenline locations Kalauao Stream and Kapālama Canal the LOS will remain “F” under both the Future No Action Alternative and the 2030 Fixed Guideway Alternative. That being the case, the stated goal to “improve” existing conditions, or LOS, is somewhat misleading; rather, the peak-hour volumes and LOS for

future with- and without project conditions suggest there is a need to “provide an alternate means of movement” from Kapolei to Downtown Honolulu/UH at Mānoa. To this end, we agree the inclusion of the verbiage “...to provide high-capacity transit...” is appropriate, but again, caution the use of language that is unduly restrictive.

Similar to NEPA, the CWA Section 404 (b)(1) Guidelines (Guidelines) state that a project’s purpose and need is a prerequisite to establishing the reasonable range of alternatives to be evaluated. For activities or projects that are subject to a standard individual permit review process, the statement of purpose for compliance with the Guidelines has two elements: the basic and the overall project purpose. The basic project purpose defines the project purpose in its most simplistic terms and is determined to establish whether a proposed action is water dependent. The overall project purpose is the basic project purpose in consideration of the general objectives of the applicant, cost, logistics, and existing technology. It provides for a more specific definition of the purpose and need of an applicant’s project. The overall project purpose should be specific enough to define the FTA’s and DTS’s needs, but not so restrictive as to preclude all discussion of alternatives. As you may know, the overall project purpose is used for evaluating practicable alternatives under the Guidelines, which require that if the overall purpose of a project is practicably met through several alternatives, the Corps can only authorize the least environmentally damaging practicable alternative (LEDPA).

In light of the aforementioned, we strongly encourage adherence to the general principles and guidelines regarding the development of the Project’s overall purpose within the regulatory context of Section 404 of the CWA.

### **Alternatives and NEPA Scope of Analysis**

The Council on Environmental Quality (CEQ) regulations requires an EIS objectively and rigorously examine all reasonable alternatives to the proposal. Towards this end, the range of alternatives should include reasonable alternatives that are not within the jurisdiction of FTA and/or DTS, if they exist (40 CFR 1502.14). As a matter of policy, the range of alternatives and rigor of analysis should be proportional to the level of impacts. The NEPA analysis must pursue and disclose feasible and practicable opportunities for the avoidance and minimization of impacts on the aquatic environment. For projects that are individually reviewed by the Corps, this is important in demonstrating compliance with the substantive requirements of the Guidelines, as well as consistency with our public interest review process.

Paramount to our Section 404 permit decision-making process is that proposed transit technologies and alignments which exhibit the least overall adverse environmental harm are appropriately examined in the context of “practicability”<sup>1</sup>, especially prior to being eliminated from further consideration. In other words, as alternatives are evaluated for their effectiveness in achieving the project purpose FTA and DTS should give equal consideration to the impacts on the aquatic ecosystem and other environmental concerns, such as Department of Transportation Act Section 4(f) concerns (e.g., public parks,

<sup>1</sup> “Practicability” as defined by 40 C.F.R. § 230.3(q)

recreational sites, wildlife refuges and historic sites), and select the alternative that would result in the least overall environmental harm. An alternative with fewer impacts to aquatic resources than the preferred alternative may only be eliminated by demonstrating it has other overriding significant environmental impacts (40 CFR 230.10(a)).

The nature of funding for this Project and its phased implementation over the planning horizon (i.e., future extensions and station locations), requires the Project alternatives be examined in the context of independent utility and the proper NEPA scope of analysis to avoid "piecemealing" the environmental analysis. Technical data regarding independent utility and the NEPA scope of analysis should be succinctly presented in the early stages of the EIS development. The Corps believes the environmental consequences resulting from construction of the "Minimal Operable Segment" and all planned extensions must be considered in the project-level EIS, particularly if the Project benefits, wholly or partially, are derived from one or more of these future extensions and station locations. More specifically, NEPA requires the Federal lead agency define the scope of analysis for an individual EIS based on consideration of three factors: 1) the *types of actions*, 2) the *types of alternatives*, and 3) the *types of impacts*. The three types of actions include:

- a. Connected actions, which means closely related and are connected if they:
  - i. Trigger other actions,
  - ii. Cannot or will not proceed unless other actions are taken previously or simultaneously, or
  - iii. Are interdependent parts of a larger action and depend on the larger action for their justification.
- b. Cumulative actions, which when viewed with other proposed actions have cumulatively significant impacts and should therefore be discussed in the same impact statement.
- c. Similar actions, which when viewed with other reasonably foreseeable or proposed agency actions, have similarities that provide a basis for evaluating their environmental consequences together, such as common timing or geography.

My staff therefore recommends the environmental review process adequately documents how the NEPA scope of analysis is defined and the range of alternatives is formulated.

#### **Identification of Resources & Evaluation of Impacts to the Aquatic Environment**

The Council on Environmental Quality (CEQ) requires the data and analyses in an EIS are commensurate with the importance of the impact (40 C.F.R. § 1502.15). Similarly, the Guidelines emphasize the level of documentation should reflect the significance and complexity of the discharge activity (40 C.F.R. § 230.6). In the context of the *Honolulu High-Capacity Transit Corridor Project*, the evaluation of project impacts should include relevant quantitative information pertaining to water resources that is coalesced in the main text of the draft EIS. These data must disclose the projected

direct, indirect and cumulative impacts (beneficial and detrimental) to the aquatic environment associated with each of the proposed alternatives in a comparative format.

An important distinction to keep in mind when evaluating the impacts, or "harm", to non-aquatic resources versus impacts to waters of the U.S., is that, for the former, the alternatives selection process evaluates reasonable and prudent alternatives based on the "net harm" after mitigation of the alternative. Conversely, Section 404 alternatives analyses, the evaluation of practicable alternatives must consider the impacts to waters of the U.S. that would result from the alternative before compensatory mitigation. That is, compensatory mitigation may not be used as a method to reduce environmental impacts in the evaluation of the LEDPA (Corps and U.S. EPA Memorandum of Agreement, 1990). These are important aspects of the environmental process to be cognizant of; specifically should the Project necessitate an individual Section 404 permit.

#### Direct Effects

The corridor study area is relatively large and encompasses some of the most densely populated areas on the Island of O'ahu. Consequently, many of the streams, wetlands and other aquatic resources occurring within the Project study area have been altered or disturbed by past and on-going urban development. As a consequence, these anthropogenic disturbances have, in many cases, diminished the functions and values of the aquatic resources. However, the study area does support streams and wetlands that remain relatively intact or ecologically sensitive and impacts to these areas could be deleterious.

We request the draft EIS, including any appropriate technical studies, identify the temporary and permanent impacts to waters of the U.S. In determining impacts, consideration should be given to the alignment right-of-way and transit structure, including piers and bridge structures; the location, design and overall footprint of disturbance for each transit station location, including associated parking structures; maintenance or emergency access points; and any other ancillary features that may result in the permanent or temporary loss of waters of the U.S. Temporary stream diversions and cofferdams used or employed during construction are also important to identify and include in the analysis of effects. Streambank protection or bank stabilization that may be necessitated by one or more of the transit alignments at water crossings should be similarly identified in the draft EIS.

#### Indirect Effects

Indirect impacts, including growth-inducing effects, must also be identified and evaluated in the draft EIS. The acknowledgment in the NOI and Scoping Information Package that Kapolei is fast becoming a "second city" and the that the Ewa Development Plan area is [unlikely] to "...develop as planned unless it is accessible to Downtown and other parts of O'ahu...to support its future growth..." reveals the importance for the EIS to evaluate the potential indirect and growth-inducing impacts on the natural environment as a result of the proposed Project. While it is likely that development in this area will

occur with or without the proposed Project, land use patterns, scheduling or timing of future development, and the nature and juxtaposition of such development may be influenced or caused by the proposed Project. In fact, national data and studies suggest VMT growth is often substantially affected by development patterns. As jobs and housing become increasingly segregated, there tends to be a corresponding increase in driving time and hence VMT. For this reason, it seems prudent to disclose how the *Honolulu High-Capacity Transit Corridor Project* may help to ameliorate this "urban sprawl" effect vis-à-vis its support of high density development. In the end, all reasonably identifiable indirect impacts, detrimental or beneficial, on the biological and physical environments should be disclosed in the EIS.

In some cases, permanent structures, such as bridges, over surface water resources have been found to negatively impact water quality and aquatic species by altering water temperatures and the type or presence of in-stream and streambank vegetation. Therefore, we recommend FTA and DTS identify any indirect and incremental shading effects that could be expected from new or expanded bridge structures associated with the proposed alternatives.

The overall health and integrity of the aquatic ecosystem depends largely on water quality, habitat vitality and diversity, and hydrologic processes. Therefore, the loss or degradation of waters of the U.S. must meaningfully consider these factors. Based on our regulations and policies, we place a high degree of importance on quantifying and characterizing the functional losses resulting from the discharge of dredged or fill material into waters of the U.S. Functions are the physical, chemical and biological attributes of a wetland/waters without regard to its importance to society. Examples of functions include flood storage, wildlife habitat, and grounder water recharge. Values are those wetlands/waters functions that generally are regarded as beneficial to society, such as recreation, aesthetics, and wildlife viewing. A functional assessment (FA) should determine which functions are performed by the wetlands/waters, the value of those functions, and how the Project will affect the continued performance of the identified functions. If a FA is deemed appropriate, the precise assessment methodology and rigor for characterizing the functions and values of aquatic resources should be determined in close consultation with the Corps. We suggest the EIS quantitatively and/or qualitatively address the anticipated functional losses to aquatic ecosystems to the extent appropriate and practicable. Factors to consider include changes to sedimentation (e.g., sediment transport, in-stream aggradation and degradation), erosion, turbidity, hydrologic regime, water quality, floodplain encroachment, invasive species, and other native habitat perturbations.

#### Cumulative Effects

The Council on Environmental Quality (CEQ) regulations define cumulative effect as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions" (40 CFR 1508.7). A critical principle is the consideration of past and present

projects as they relate to establishing the environmental baseline and disturbance thresholds for each relevant resource. That is, the cumulative effects analysis should be conducted within the context of resource, ecosystem, and human community thresholds—levels of stress beyond which the desired condition degrades. The magnitude and extent of the effect on a resource depends on whether the cumulative effects exceed the capacity of the resource to sustain itself and remain productive. Similarly, the natural aquatic ecosystem and the human community have maximum levels of cumulative effects that they can withstand before the desired conditions of ecological functioning and human quality of life deteriorate (CEQ, 1997).

To facilitate future decision-making, all reasonably foreseeable projects, private or public that are identified, programmed, funded or approved in regional planning documents should be carefully and fully considered as part of the cumulative impact analysis. Aside from the proposed Project, all connected and similar actions that could contribute to cumulative effects (beneficial or detrimental) must be appropriately considered in the draft EIS. The cumulative impacts analysis should evaluate both the temporal (time) and spatial (geographic) effects associated with each significant environmental resource category.

### **Mitigation and Sequencing**

The NEPA requires a discussion of mitigation for adverse environmental impacts of alternatives, where mitigation is defined to include avoidance, minimization, restoration and creation of habitats. Section 404 of the CWA also requires consideration of practicable alternatives to avoid and minimize adverse environmental impacts, and further requires that these measures be exhausted before turning to restoration and creation of habitats. Since the proposed Project alternatives are likely to cross a number of streams, channels, and other aquatic resources, we advocate design features that would likely avoid or reduce the direct impacts to surface water resources. Both on-site (e.g., design features) and off-site (e.g., different alignments) options to avoid and minimize impacts to waters of the U.S. is important in terms of demonstrating that the Project has taken appropriate and practicable steps to minimize potential adverse impacts of the discharge on the aquatic ecosystem (40 C.F.R. 230.10(d)).

Mitigation is an important aspect of the review and balancing process on many DA permit applications. Consideration of mitigation should occur throughout the permit application review process. Mitigation generally falls into three categories:

- 1) Project modifications to minimize adverse impacts;
- 2) Further mitigation measures to satisfy legal requirements; and
- 3) Mitigation measures that result from the public interest review process.

For unavoidable adverse impacts, compensatory mitigation must be for significant resource losses that are specifically identifiable, reasonably likely to occur, and of importance to the human or aquatic environment. Further, all mitigation must be directly related to the impacts of the proposed Project, appropriate to the scope and degree of

those impacts, and reasonably enforceable. The Corps recommends FTA and DTS incorporate the general tenets of our Honolulu District Mitigation Guidelines (dated February 14, 2005), Regulatory Guidance Letter (RGL) 02-02, *Guidance on Compensatory Mitigation Projects for Aquatic Resource Impacts Under the Corps Regulatory Program Pursuant to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act of 1899*, and RGL 03-06 *Minimum Monitoring Requirements for Compensatory Mitigation Projects Involving the Aquatic Resources* in your conceptual mitigation planning. These RGLs can be found at [www.usace.army.mil/cw/cecwo/reg/rglindx.htm](http://www.usace.army.mil/cw/cecwo/reg/rglindx.htm). We also strongly encourage FTA and DTS give appropriate credence to the Corps and U.S. Environmental Protection Agency's joint proposed rule for "Compensatory Mitigation for Losses of Aquatic Resources" (March 28, 2006, Federal Register 15520), which we anticipate could be finalized prior to completion of the *Honolulu High-Capacity Transit Corridor Project* EIS.

The Corps also encourages the FTA and DTS to pursue any and all mitigation planning opportunities afforded at this early stage of the environmental process by leveraging the resources of Federal, State, local and non-profit entities to help with watershed-wide identification of areas suitable for wetlands enhancement, restoration and/or in-perpetuity preservation, as deemed appropriate by the Project's preliminary impact analyses. The draft EIS should propose a meaningful suite of conceptual mitigation strategies that would avoid and minimize impacts and compensate for any unavoidable adverse impacts to aquatic resources. Possible compensatory mitigation strategies could include establishment of a mitigation bank or an in lieu fee agreement; on- and/or off-site land acquisition and restoration; and control or eradication of invasive species that would enable native species to re-colonize.

### **Data Needs**

Disclosure of the degree and magnitude of impacts is necessary for soliciting meaningful public input as well as for making informed decisions. As a matter of efficacy, the *Honolulu High-Capacity Transit Corridor Project* draft EIS should include a summary of the major impacts to water resources with accompanying aerial or topographic maps of sufficient scale that geo-spatially illustrate the potential direct and indirect effects associated with the discharge of dredged or fill material into waters of the U.S.

Although not all-inclusive, the following list comprises a general overview of the potential data needs and analyses for identifying and assessing waters of the U.S. during the Project's environmental evaluation and EIS review process.

- A delineation of all wetlands, which could be affected by the proposed Project. The delineation must follow the procedures set forth in the 1987 Wetlands Delineation Manual and include the data support forms.
- A delineation of other waters of the U.S. as follows:
  - For tidal waters, the high tide line shall be determined as described at 33 C.F.R. § 328.3(d);

- For non-tidal waters, the ordinary high water mark shall be determined as described at 33 C.F.R § 328.3(e).
- All plant and animal taxa encountered during site visits;
- A detailed assessment of the functions and values of wetlands and other waters of the U.S.
- A detailed assessment of project impacts on special aquatic sites and other waters as follows:
  - A detailed description of the project impacts, including the type of impact (e.g., habitat removal, fragmentation, introduction of exotic species) and its magnitude. These effects must be evaluated in the appropriate local or regional context.
- A detailed purpose and need statement, coordinated with the appropriate agencies. It is noteworthy to mention the Corps is solely responsible for the final approval of the overall project purpose used to conduct the 404(b)(1) alternatives analysis.
- A feasibility study of candidate mitigation sites
- Maps showing the occurrences of all associated sensitive species that have been identified within the survey area in relation to project features, including federally listed endangered and threatened species and designated critical habitat.
  - The size of the population(s) in terms of numbers of individuals and habitat occupied
  - The portion of the population(s) to be directly affected by each project alternative
  - The portion of the population to be indirectly affected by each alternative
  - The amount of suitable habitat to be directly or indirectly affected under each alternative

### **Inter-agency Coordination**

I commend your efforts to engage our agency early in your environmental process. At this stage, our primary regulatory responsibilities associated with the *Honolulu High-Capacity Transit Corridor Project* NEPA document are to provide guidance on CWA and RHA procedures, disclose substantive issues relating to the direct, indirect and/or cumulative effects on the aquatic environment, and identify data gaps or other informational needs for our regulatory process requirements. Depending on our scope of analysis, we would also expect to provide feedback at key milestones to ensure the decisions made around Section 404 of the CWA are adequately substantiated and documented.

The 1995 *NEPA/404 Integration Process Memorandum of Understanding (MOU) for Surface Transportation Projects in the State of Hawaii* may have utility with this proposed FTA/DTS transit project. The MOU establishes formal procedures for Federal regulatory and resource agencies to work collaboratively with the transportation lead agencies to streamline the environmental review process. Implementation of the MOU merger procedures have been found particularly helpful for large-scale surface transportation projects that are expected to adversely affect waters of the U.S. and other environmentally sensitive resources.

I recognize the importance this transit project has to the City and County of Honolulu and in particular, to the quality of life for the commuting public. Conceptually, the implementation of a fixed guideway transit system could result in substantial transportation benefits to the leeward communities and a net overall environmental benefit in terms of air quality, noise and socioeconomics when compared to other transportation improvement or modal options. For these reasons, I look forward to my staff working collaboratively with FTA, DTS, and other Federal, State and local agencies to ensure the purpose and needs of this project are met while avoiding and minimizing the adverse impacts to the aquatic environment to the maximum extent practicable. If you have any questions or need clarification on our comments, please feel free to contact Ms. Susan A. Meyer of my staff at (808) 438-2137 or [susan.a.meyer@usace.army.mil](mailto:susan.a.meyer@usace.army.mil).

Sincerely,



George P. Young, P.E.  
Chief, Regulatory Branch

Enclosure

Copies Furnished (w/o encl):

Ms. Connell Dunning and Dr. Wendy Wiltse, U.S. Environmental Protection Agency

Mr. Michael Molina, U.S. Fish and Wildlife Service

Mr. John Naughton, NOAA, Fisheries

CEPOH-PP-C (Mr. Paul Mizue)

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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 788-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 18, 2008

RT8/08-274365

Lieutenant Colonel Charles H. Klinge  
U. S. Army Corps Of Engineers  
Pacific Ocean Division  
Building 230  
Fort Shafter, Hawaii 96858-5440

Attention: Regulatory Branch, Engineering and Construction

Dear Lieutenant Colonel Klinge:

Subject: Honolulu High-Capacity Transit Corridor Project  
Cooperating Agency Project Update

Thank you for agreeing to become involved in the environmental review process for the Honolulu High-Capacity Transit Corridor Project as a Cooperating Agency. Pursuant to stipulations in the National Environmental Policy Act (NEPA), Section 6002 of the *Safe, Accountable, Flexible, Efficient, Transportation Equity Act—A Legacy for Users* (SAFETEA-LU) guidance for federally funded projects, Chapter 343 of the Hawaii Revised Statutes, and your participation as a Cooperating Agency with the Project, the City and County of Honolulu Department of Transportation Services (DTS) is providing an internal and confidential intergovernmental copy of the Administrative Draft Environmental Impact Statement (EIS) for your review and comment.

DTS also requests to formally present an update on the project to answer any questions that your agency may have regarding the project. This briefing will provide an overall project update and will allow discussion of any specific questions and/or concerns about this project.

Any formal comment regarding this intergovernmental review of the Administrative Draft EIS is requested by September 17, 2008, and should be addressed to:

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Lieutenant Colonel Charles H. Klinge  
Page 2  
August 18, 2008

If you would like for project staff to provide an update, please contact Ms. Stephanie Roberts at (808) 768-6143 to schedule a meeting. We look forward to updating you about the project.

Very truly yours,



WAYNE Y. YOSHIOKA  
Director

Enclosure: 1 copy of Administrative Draft EIS

R79/08-280199



DEPARTMENT OF THE ARMY  
U.S. ARMY ENGINEER DISTRICT, HONOLULU  
FORT SHAFTER, HAWAII 96858-5440

September 16, 2008

REPLY TO  
ATTENTION OF:

Regulatory Branch

File Number POH-2007-188

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

RECEIVED  
SEP 18 12:41  
DIRECTOR'S OFFICE  
DEPT. OF  
TRANSPORTATION SERVICES

Dear Mr. Yoshioka:

This letter is in response to your August 18, 2008, letter requesting comments and review of the Administrative Draft Environmental Impact Statement (DEIS) *Honolulu High-Capacity Transit Corridor Project* ("Project") located on the Island of O'ahu, Hawaii. The Federal Transit Administration (FTA) and the City and County of Honolulu, Department of Transportation Services (DTS) jointly prepared the DEIS for this proposal in accordance with National Environmental Policy Act (NEPA) implementing regulations (40 CFR §1500-1508) and pursuant to the State Environmental Impact Statement (EIS) Law (Chapter 343, Hawaii Revised Statutes). The proposed project would implement a fixed guideway transit system in the east-west transportation corridor between Kapolei and the University of Hawai'i at Mānoa with a branch to Waikiki. Alternatives considered in the DEIS include the No Action/No Build alternative and three fixed guideway transit alternatives: 1) via Salt Lake Boulevard, 2) via the Honolulu International Airport, and 3) via the Honolulu International Airport and Salt Lake Boulevard.

As a Federal agency with jurisdiction by law, the U.S. Army Corps of Engineers (Corps) comments are based on information presented in the *Administrative DEIS Honolulu High-Capacity Transit Corridor Project* (dated August 1, 2008) and are provided pursuant to our regulatory authorities promulgated under Section 404 of the Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act of 1899 (RHA).

**Regulatory Scope**

Our letter, dated April 10, 2007 ("letter"), stated "...we expect that site-specific information regarding the delineation of waters of the U.S. and the characterization of the extent/intensity of potential aquatic resource impacts will assist in defining the scope of the Corps' involvement [in the review process]." In Chapter 4.13-Water, Tables 4-25 (Stream in the Study Corridor), 4-26 (Marine Water in the Study Corridor), 4-27 (Floodplains), and 4-28 (Wetlands) identify and list waters found to be located within or in the vicinity of the project corridor; however, these tables lack detailed information. Section 4.13.1 Methodology states that "field investigations for wetlands were conducted along the project alignment ... to identify areas with wetland characteristics, including the presence of water (hydrology), hydrophytic vegetation, and hydric soils." The availability of the information collected during these field investigations including

information regarding the functions and values, as well as, an estimate of the impacts to waters of the U.S. for each alternative will help the Corps establish the appropriate Department of Army (DA) authorization require should the proposed Project, or any of its parts, be regulated under Section 10 of the RHA and/or Section 404 of the CWA.

### **Purpose and Need**

Our letter indicated that the inclusion of the term "high-speed" within the project purpose and need statement may arbitrarily or inappropriately narrow the range of practicable alternatives. We note that within the purpose and need statement of the DEIS, the term "high-speed" has been replaced by the term "rapid" which by definition is highly similar. The Corps maintains if the goal of the proposal is to provide efficient, reliable and effective movement of the public, inclusion of other "non-high-speed" transit and modal alternatives may provide a clearer and sharper comparison between alternatives for NEPA purposes. Again, we recommend you consider modifications to the purpose statement to ensure the Federal NEPA and CWA processes are structured to evaluate a full range of reasonable alternatives.

### **Project Impacts**

Chapter 4.13-Water, Section 4.13.3 Environmental Consequences and Mitigation contains information that appears to be contradicting. Regarding surface and marine waters, within the Mitigation paragraph it states that "since no impacts to surface and marine waters are expected, no mitigation is required"; however, above this in the Environmental Consequences paragraph above, it states that "surface and marine waters within the study corridor are not expected to be adversely affected by the project." The Corps interprets the latter to indicate that impacts to surface and marine waters will in fact occur as a result of the proposal.

### **Mitigation and Sequencing**

Our letter referenced the *Compensatory Mitigation for Losses of Aquatic Resources; Final Rule*. As of April 10, 2008, the Final Rule is in effect. The guidelines set forth in the Final Rule should be referenced to assist in developing any required mitigation plans. A copy of the rule can be access at <http://frwebgate4.access.gpo.gov/cgi-bin/PDFgate.cgi?WAISdocID=672942522028+18+1+0&WAIAction=retrieve> or, at your request, a copy of the Final Rule will be provided.

### **Data Needs**

Although not all-inclusive, the following list comprises a general overview of the potential data needs and analyses essential for identifying and assessing waters of the U.S. This list was provided in our letter; however, we are including the information again to reiterate the Corps data requirements for completion of our environmental evaluation and review of the Project:

- A delineation of all wetlands, which could be affected by the proposed Project. The delineation must follow the procedures set forth in the 1987 Wetlands Delineation Manual and include the data support forms.
- A delineation of other waters of the U.S. as follows:

- For tidal waters, the high tide line shall be determined as described at 33 C.F.R. § 328.3(d);
- For non-tidal waters, the ordinary high water mark shall be determined as described at 33 C.F.R § 328.3(e).
- All plant and animal taxa encountered during site visits;
- A detailed assessment of the functions and values of wetlands and other waters of the U.S.
- A detailed assessment of project impacts on special aquatic sites and other waters as follows:
  - A detailed description of the project impacts, including the type of impact (e.g., habitat removal, fragmentation, introduction of exotic species) and its magnitude. These effects must be evaluated in the appropriate local or regional context.
- A detailed purpose and need statement, coordinated with the appropriate agencies. It is noteworthy to mention the Corps is solely responsible for the final approval of the overall project purpose used to conduct the 404(b)(1) alternatives analysis.
- A feasibility study of candidate mitigation sites
- Maps showing the occurrences of all associated sensitive species that have been identified within the survey area in relation to project features, including federally listed endangered and threatened species and designated critical habitat.
  - The size of the population(s) in terms of numbers of individuals and habitat occupied
  - The portion of the population(s) to be directly affected by each project alternative
  - The portion of the population to be indirectly affected by each alternative
  - The amount of suitable habitat to be directly or indirectly affected under each alternative

Should you have any questions regarding this jurisdictional determination, please contact Ms. Serena Sweet of my staff at (808) 438-2039 or by e-mail at [serena.e.sweet@usace.army.mil](mailto:serena.e.sweet@usace.army.mil) and reference the Corps File No. POH-2007-127 in all future correspondence and inquiries related to this project.

Sincerely,



for George P. Young, P.E.  
Chief, Regulatory Branch

Copies Furnished:

Ms. Connell Dunning, U.S. Environmental Protection Agency  
Dr. Wendy Wiltse, U.S. Environmental Protection Agency  
Mr. Michael Molina, U.S. Fish and Wildlife Service  
Mr. Bill Robinson, NOAA, Fisheries  
Mr. Derek Chow, CEPOH-PP-C



U.S. Department  
of Transportation  
Federal Transit  
Administration

REGION IX  
Arizona, California,  
Hawaii, Nevada, Guam  
American Samoa,  
Northern Mariana Islands

201 Mission Street  
Suite 1650  
San Francisco, CA 94105-1839  
415-744-3133  
415-744-2726 (fax)

Colonel Howard J. Killan  
US Army Garrison Hawaii  
Building 580 Fernandez Hall  
Schofield Barracks, HI 96857

Re: Invitation to be a Cooperating Agency in the Environmental Review Process for the  
Honolulu High-Capacity Transit Corridor Project

Dear Colonel Killan:

The Federal Transit Administration (FTA), in cooperation with the City and County of Honolulu, Department of Transportation Services (DTS) is initiating the preparation on a proposal by the City and County of Honolulu to implement a fixed-guideway transit system in the corridor between Kapolei and the University of Hawai'i at Mānoa with a branch to Waikīkī. Alternatives proposed to be considered in the draft EIS include No Build and two Fixed Guideway Transit alternatives.

The purpose of the project, as currently defined, is to provide high-capacity, high-speed transit in the highly congested east-west transportation corridor between Kapolei and the University of Hawai'i at Mānoa, as specified in the 2030 O'ahu Regional Transportation Plan (ORTP). The project is intended to provide faster, more reliable public transportation services in the corridor than those currently operating in mixed-flow traffic, to provide basic mobility in areas of the corridor where people of limited income live, and to serve rapidly developing areas of the corridor. The project would also provide an alternative to private automobile travel and improve transit linkages within the corridor. Implementation of the project, in conjunction with other improvements included in the ORTP, would moderate anticipated traffic congestion in the corridor. The project also supports the goals of the O'ahu General Plan and the ORTP by serving areas designated for urban growth.

The Honolulu High-Capacity Transit Corridor Project proposed improvements likely will require the U.S. Army approval related to crossing U.S. Army property, so we are formally requesting the U.S. Army to be a cooperating agency. The enclosed scoping information packet provides more details including a preliminary schedule.

FTA seeks the U.S. Army's cooperation in coordinating and determining effects of the proposed construction of the build alternatives under study and associated facilities on the Honolulu High-Capacity Transit Corridor Project, including those related to other project alternatives, environmental consequences, and mitigation. You can expect that the EIS will, to the greatest extent possible, satisfy the U.S. Army statutory responsibilities and concerns. The

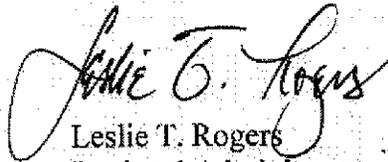
environmental documentation will address environmental and programmatic concerns identified by the U.S. Army and will be sufficiently detailed to enable the U.S. Army to grant necessary permits or other approvals that may ensue from the build alternatives under study. If at any point in the process your needs are not being met, please let us know. We expect that at the end of the process the EIS will satisfy your NEPA requirements.

We are providing a copy of the Federal Register Notice of Intent with this letter. Scoping materials are also available on the project website at <http://www.honolulustransit.org>. The interagency scoping meeting will be held on the following date and location:

- Honolulu Hale, Mission Memorial Auditorium at 558 South King Street, Honolulu, HI 96813 at March 28, 2007 from 10:00 a.m. to 12:00 p.m.

We look forward to your response to this request and your role as a cooperating agency on this project. If you have questions or would like to discuss in more detail the project or our agencies' respective roles and responsibilities during the preparation of this EIS, please contact Mr. Ted Matley at (415) 744-2590 or Mr. Toru Hamayasu of DTS at (808) 768-8344. This contact information supercedes the information provided in the Notice of Intent. An City and County of Honolulu project representative will be contacting your office as the project proceeds.

Sincerely,

  
Leslie T. Rogers  
Regional Administrator

Enclosures (3):

1. Scoping Information Packet/Schedule
2. Federal Register NOI
3. Draft Coordination Plan

cc: City and County of Honolulu, Department of Transportation Services  
US Army Garrison Hawaii (Apvg-Gwe-M)

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

850 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 758-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 18, 2008

RT8/08-274366

Colonel Howard J. Killan  
U. S. Army Garrison, Hawaii  
Building 580, Fernandez Hall  
Schofield Barracks, Hawaii 96857-5000

Attention: Environmental Division

Dear Colonel Killan:

Subject: Honolulu High-Capacity Transit Corridor Project  
Cooperating Agency Project Update

Thank you for agreeing to become involved in the environmental review process for the Honolulu High-Capacity Transit Corridor Project as a Cooperating Agency. Pursuant to stipulations in the National Environmental Policy Act (NEPA), Section 6002 of the *Safe, Accountable, Flexible, Efficient, Transportation Equity Act—A Legacy for Users* (SAFETEA-LU) guidance for federally funded projects, Chapter 343 of the Hawaii Revised Statutes, and your participation as a Cooperating Agency with the Project, the City and County of Honolulu Department of Transportation Services (DTS) is providing an internal and confidential intergovernmental copy of the Administrative Draft Environmental Impact Statement (EIS) for your review and comment.

DTS also requests to formally present an update on the project to answer any questions that your agency may have regarding the project. This briefing will provide an overall project update and will allow discussion of any specific questions and/or concerns about this project.

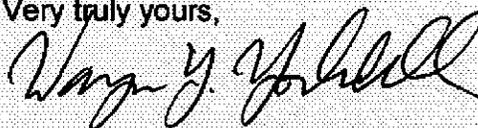
Any formal comment regarding this intergovernmental review of the Administrative Draft EIS is requested by September 17, 2008, and should be addressed to:

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Colonel Howard J. Killan  
Page 2  
August 18, 2008

If you would like for project staff to provide an update, please contact Ms. Stephanie Roberts at (808) 768-6143 to schedule a meeting. We look forward to updating you about the project.

Very truly yours,

A handwritten signature in black ink, appearing to read "Wayne Y. Yoshioka". The signature is fluid and cursive, with the first name "Wayne" and last name "Yoshioka" clearly distinguishable.

WAYNE Y. YOSHIOKA  
Director

Enclosure: 1 copy of Administrative Draft EIS



U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION IX  
Arizona, California,  
Hawaii, Nevada, Guam  
American Samoa,  
Northern Mariana Islands

201 Mission Street  
Suite 1650  
San Francisco, CA 94105-1839  
415-744-3133  
415-744-2726 (fax)

Lt. Commander Dave Kirkpatrick  
USCG, 14th Coast Guard District  
300 Ala Moana Blvd, Suite 9-108  
Honolulu, HI 96850

Re: Invitation to be a Cooperating Agency in the Environmental Review Process for the  
Honolulu High-Capacity Transit Corridor Project

Dear Lt. Commander Kirkpatrick:

The Federal Transit Administration (FTA), in cooperation with the City and County of Honolulu, Department of Transportation Services (DTS) is initiating the preparation on a proposal by the City and County of Honolulu to implement a fixed-guideway transit system in the corridor between Kapolei and the University of Hawai'i at Mānoa with a branch to Waikiki. Alternatives proposed to be considered in the draft EIS include No Build and two Fixed Guideway Transit alternatives.

The purpose of the project, as currently defined, is to provide high-capacity, high-speed transit in the highly congested east-west transportation corridor between Kapolei and the University of Hawai'i at Mānoa, as specified in the 2030 O'ahu Regional Transportation Plan (ORTP). The project is intended to provide faster, more reliable public transportation services in the corridor than those currently operating in mixed-flow traffic, to provide basic mobility in areas of the corridor where people of limited income live, and to serve rapidly developing areas of the corridor. The project would also provide an alternative to private automobile travel and improve transit linkages within the corridor. Implementation of the project, in conjunction with other improvements included in the ORTP, would moderate anticipated traffic congestion in the corridor. The project also supports the goals of the O'ahu General Plan and the ORTP by serving areas designated for urban growth.

The Honolulu High-Capacity Transit Corridor Project proposed improvements likely will require the U.S. Coast Guard (USCG) approval related to crossing streams, so we are formally requesting the USCG to be a cooperating agency. The enclosed scoping information packet provides more details including a preliminary schedule.

FTA seeks the USCG's cooperation in coordinating and determining effects of the proposed construction of the build alternatives under study and associated facilities on the Honolulu High-Capacity Transit Corridor Project, including those related to other project alternatives, environmental consequences, and mitigation. You can expect that the EIS will, to the greatest extent possible, satisfy the USCG statutory responsibilities and concerns. The environmental

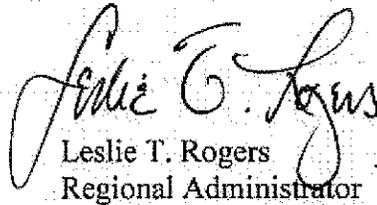
documentation will address environmental and programmatic concerns identified by the USCG and will be sufficiently detailed to enable the USCG to grant necessary permits or other approvals that may ensue from the build alternatives under study. If at any point in the process your needs are not being met, please let us know. We expect that at the end of the process the EIS will satisfy your NEPA requirements.

We are providing a copy of the Federal Register Notice of Intent with this letter. Scoping materials are also available on the project website at <http://www.honolulutransit.org>. The interagency scoping meeting will be held on the following date and location:

- Honolulu Hale, Mission Memorial Auditorium at 558 South King Street, Honolulu, HI 96813 at March 28, 2007 from 10:00 a.m. to 12:00 p.m.

We look forward to your response to this request and your role as a cooperating agency on this project. If you have questions or would like to discuss in more detail the project or our agencies' respective roles and responsibilities during the preparation of this EIS, please contact Mr. Ted Matley at (415) 744-2590 or Mr. Toru Hamayasu of DTS at (808) 768-8344. This contact information supercedes the information provided in the Notice of Intent. An City and County of Honolulu project representative will be contacting your office as the project proceeds.

Sincerely,



Leslie T. Rogers  
Regional Administrator

Enclosures (3):

1. Scoping Information Packet/Schedule
2. Federal Register NOI
3. Draft Coordination Plan

cc: City and County of Honolulu, Department of Transportation Services

U.S. Department of  
Homeland Security



United States  
Coast Guard

Commander,  
Fourteenth Coast Guard District

300 Ala Mona Blvd #9-106  
Honolulu, HI 96850  
Staff Symbol: dpw  
Phone: (808) 541-2319  
Fax: (808) 541-2309  
Email: Douglas.a.jannusch@uscg.mil

16590

JUN 28 2007

U.S. Department of Transportation  
Federal Transit Administration, Region IX  
Attn: Mr. Leslie Rogers  
201 Mission Street, Ste. 1650  
San Francisco, CA 94105-1839

JUL 11 9 12 AM '07  
DTS  
TRANS PLANNING

Dear Sir,

Thank you for your invitation to become a Cooperating Agency in the Environmental Review Process for the Honolulu High-Capacity Transit corridor Project.

According to the documentation provided in your Scoping Information Packet, the project team appears to be considering a number of alternatives that may involve the construction of structures crossing streams potentially subject to the regulatory jurisdiction of the United States Coast Guard. The Coast Guard will need to evaluate the navigability of each stream, which will then determine any Coast Guard jurisdiction and our subsequent participation in the EIS as a Cooperating Agency. Due to the large scope of this proposed project, the Coast Guard also intends to evaluate whether the proposed project could impact properties or other areas subject to our regulation.

My Waterways Management staff will be in contact with you to obtain necessary information regarding the proposed project, and will be conducting site visits to the streams in the near future. My point of contact on this matter is LT Douglas Jannusch at (808) 541-2319.

Sincerely,

F. W. TUCHER  
Captain, U.S. Coast Guard  
Chief, Prevention Division  
By direction

Copy: State of Hawaii, Department of Transportation

U.S. Department of  
Homeland Security

United States  
Coast Guard



Commander,  
Fourteenth Coast Guard District

300 Ala Moana Blvd #9-106  
Honolulu, HI 96850  
Staff Symbol: dpw  
Phone: (808) 541-2319  
Fax: (808) 541-2309  
Email: Douglas.a.jannusch@uscg.mil

16590

SEP 28 2007

U.S. Department of Transportation  
Federal Transit Administration, Region IX  
Attn: Mr. Leslie Rogers  
201 Mission Street, Ste. 1650  
San Francisco, CA 94105-1839

Dear Mr. Rogers,

We have completed our review of the City of Honolulu, National Environmental Policy Act (NEPA) Scoping Report for the proposed Honolulu High-Capacity Transit Corridor Project dated 30 May 2007. The document and letter inviting the U.S. Coast Guard to be a cooperating agency for environmental review purposes were received in our office on 22 June 2007. We understand that the project includes many proposed new bridges across streams of varying navigability along the Transit Corridor's Locally Preferred Alternative.

The General Bridge Act of 1946 requires that the location and plans for bridges over navigable waters of the United States be approved by the Commandant, USCG prior to commencing construction. Although a complete navigability determination for each impacted waterway is still pending, it tentatively appears that most are what the USCG may classify as Advance Approval waterways; those not actually navigated other than by logs, log rafts, rowboats, canoes, and small motorboats (33 CFR 115.70). In the interim until the study is completed, we agree to serve as a Cooperating Agency for the project and should be listed as such for satisfying NEPA requirements. The impacts of procedures for constructing cofferdams, sand islands, and falsework bents, etc., necessary to build any proposed new bridges should be discussed in the EIS. The EIS should also contain data on the number, size and types of existing waterway traffic. This information should be compared with past and projected future trends on the use of the waterway. If all waterways are ultimately evaluated by us to be Advance Approval or non-navigable, we may at that time withdraw from further participation as a Cooperating Agency.

Applications for any bridge permits are to be addressed to Commander (dpw), Fourteenth Coast Guard District, 300 Ala Moana Blvd, Ste. 9-216, Honolulu, HI 96850-4982. A Coast Guard Bridge Permit Application Guide is available on-line at: <http://www.uscg.mil/hq/g-o/g-opt/g-opt.htm>.

We appreciate the opportunity to comment on the project in this early stage.

Sincerely,

A handwritten signature in black ink, appearing to read "F. W. Tucher".

F. W. TUCHER  
Captain, U.S. Coast Guard  
Chief, Prevention Division  
By direction

Copy: SECTOR Honolulu  
City and County of Honolulu  
USCG Office of Bridge Administration, CG-3PWB

RECEIVED  
OCT 3 11:35  
U.S. COAST GUARD  
HONOLULU, HI

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

850 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 788-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 18, 2008

RT8/08-274364

Captain F. W. Tucher, Chief  
Prevention Division  
U. S. Coast Guard  
Commander, Fourteenth Coast Guard District  
300 Ala Moana Blvd., #9-106  
Honolulu, Hawaii 96850

Attention: Lieutenant Douglas Jannusch

Dear Captain Tucher:

Subject: Honolulu High-Capacity Transit Corridor Project  
Cooperating Agency Project Update

Thank you for agreeing to become involved in the environmental review process for the Honolulu High-Capacity Transit Corridor Project as a Cooperating Agency. Pursuant to stipulations in the National Environmental Policy Act (NEPA), Section 6002 of the *Safe, Accountable, Flexible, Efficient, Transportation Equity Act—A Legacy for Users* (SAFETEA-LU) guidance for federally funded projects, Chapter 343 of the Hawaii Revised Statutes, and your participation as a Cooperating Agency with the Project, the City and County of Honolulu Department of Transportation Services (DTS) is providing an internal and confidential intergovernmental copy of the Administrative Draft Environmental Impact Statement (EIS) for your review and comment.

DTS also requests to formally present an update on the project to answer any questions that your agency may have regarding the project. This briefing will provide an overall project update and will allow discussion of any specific questions and/or concerns about this project.

Any formal comment regarding this intergovernmental review of the Administrative Draft EIS is requested by September 17, 2008, and should be addressed to:

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Captain F. W. Tucher  
Page 2  
August 18, 2008

If you would like for project staff to provide an update, please contact Ms. Stephanie Roberts at (808) 768-6143 to schedule a meeting. We look forward to updating you about the project.

Very truly yours,

A handwritten signature in black ink, appearing to read "Wayne Y. Yoshioka". The signature is fluid and cursive, written over a light background.

WAYNE Y. YOSHIOKA  
Director

Enclosure: 1 copy of Administrative Draft EIS



U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION IX  
Arizona, California,  
Hawaii, Nevada, Guam  
American Samoa,  
Northern Mariana Islands

201 Mission Street  
Suite 1650  
San Francisco, CA 94105-1839  
415-744-3133  
415-744-2726 (fax)

Mr. Abraham Wong  
Federal Highway Administration  
300 Ala Moana Blvd  
Honolulu, HI 96850

Re: Invitation to be a Cooperating Agency in the Environmental Review Process for the  
Honolulu High-Capacity Transit Corridor Project

Dear Mr. Wong:

The Federal Transit Administration (FTA), in cooperation with the City and County of Honolulu, Department of Transportation Services (DTS) is initiating the preparation on a proposal by the City and County of Honolulu to implement a fixed-guideway transit system in the corridor between Kapolei and the University of Hawai'i at Mānoa with a branch to Waikīkī. Alternatives proposed to be considered in the draft EIS include No Build and two Fixed Guideway Transit alternatives.

The purpose of the project, as currently defined, is to provide high-capacity, high-speed transit in the highly congested east-west transportation corridor between Kapolei and the University of Hawai'i at Mānoa, as specified in the 2030 O'ahu Regional Transportation Plan (ORTP). The project is intended to provide faster, more reliable public transportation services in the corridor than those currently operating in mixed-flow traffic, to provide basic mobility in areas of the corridor where people of limited income live, and to serve rapidly developing areas of the corridor. The project would also provide an alternative to private automobile travel and improve transit linkages within the corridor. Implementation of the project, in conjunction with other improvements included in the ORTP, would moderate anticipated traffic congestion in the corridor. The project also supports the goals of the O'ahu General Plan and the ORTP by serving areas designated for urban growth.

The Honolulu High-Capacity Transit Corridor Project proposed improvements likely will require the U.S. Department of Transportation Federal Highway Administration (FHWA) approval related to access to the interstate system, so we are formally requesting the FHWA to be a cooperating agency. The enclosed scoping information packet provides more details including a preliminary schedule.

FTA seeks the FHWA's cooperation in coordinating and determining effects of the proposed construction of the build alternatives under study and associated facilities on the Honolulu High-Capacity Transit Corridor Project, including those related to other project alternatives, environmental consequences, and mitigation. You can expect that the EIS will, to the greatest extent possible, satisfy the FHWA statutory responsibilities and concerns. The environmental

documentation will address environmental and programmatic concerns identified by the FHWA and will be sufficiently detailed to enable the FHWA to grant necessary permits or other approvals that may ensue from the build alternatives under study. If at any point in the process your needs are not being met, please let us know. We expect that at the end of the process the EIS will satisfy your NEPA requirements.

We are providing a copy of the Federal Register Notice of Intent with this letter. Scoping materials are also available on the project website at <http://www.honolulutransit.org>. The interagency scoping meeting will be held on the following date and location:

- Honolulu Hale, Mission Memorial Auditorium at 558 South King Street, Honolulu, HI 96813 at March 28, 2007 from 10:00 a.m. to 12:00 p.m.

We look forward to your response to this request and your role as a cooperating agency on this project. If you have questions or would like to discuss in more detail the project or our agencies' respective roles and responsibilities during the preparation of this EIS, please contact Mr. Ted Matley at (415) 744-2590 or Mr. Toru Hamayasu of DTS at (808) 768-8344. This contact information supercedes the information provided in the Notice of Intent. An City and County of Honolulu project representative will be contacting your office as the project proceeds.

Sincerely,

  
Leslie T. Rogers/  
Regional Administrator

Enclosures (3):

1. Scoping Information Packet/Schedule
2. Federal Register NOI
3. Draft Coordination Plan

cc: City and County of Honolulu, Department of Transportation Services



U.S. Department  
of Transportation  
**Federal Highway  
Administration**

Hawaii Division  
Box 50206  
300 Ala Moana Boulevard, Room 3-306  
Honolulu, HI 96850

In Reply Refer To:  
HEC-HI

April 20, 2007

Mr. Leslie T. Rogers  
Federal Transit Administration  
201 Mission Street, Suite 1650  
San Francisco, CA 94105-1839

Dear Mr. Rogers:

Re: Acceptance of Cooperating Agency Status in the Environmental  
Review Process for the Honolulu High-Capacity Transit Corridor Project

The Federal Highway Administration (FHWA) accepts the invitation extended by the Federal Transit Administration (FTA). FHWA is pleased to serve as a cooperating agency in the environmental review process for the Honolulu High-Capacity Transit Corridor Project.

FHWA appreciates that FTA will, to the greatest extent possible, satisfy the FHWA statutory responsibilities and concerns. As you indicated in your letter, environmental documentation that includes the analysis, impacts, and program concerns identified by FHWA will assist FHWA in ensuring environmental responsibilities are met. Such information will assist our office in rendering decisions on agency actions that may ensue from the build alternatives.

We look forward to working with your agency on this endeavor. Ms. Jodi Chew, FHWA Hawaii Division, Environmental Specialist, will be the primary contact for this project. She can be reached at 808.541.2700, extension 328.

Sincerely yours,

For Abraham Wong  
Division Administrator

cc: City and County of Honolulu, Department of Transportation Services

APR 23 11 03 AM '07  
TRANS PLANNING  
DTS

TP 4/07-205304

RT9/08-280203



U.S. Department  
of Transportation  
**Federal Highway  
Administration**

Hawaii Division  
300 Ala Mona Blvd Rm 3306  
Honolulu, HI 96850-3306

September 15, 2008

In Reply Refer To: HAD-HI

DIRECTOR'S OFFICE  
FEDERAL HIGHWAY  
ADMINISTRATION  
TRANSPORTATION SERVICES

08 SEP 18 P12:41

RECEIVED

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 S. King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Dear Mr. Yoshioka:

**Subject: Honolulu High-Capacity Transit Corridor Project  
Cooperating Agency Project Update**

Thank you for affording the Federal Highway Administration (FHWA) the opportunity to review and comment on the Administrative Draft EIS. FHWA has an oversight responsibility for use of airspace within the right-of-way limits of the Interstate, and for any change in access to the Interstate. Our office will need sufficient information to determine that the transit proposal does not impair the highway or interfere with the free and safe flow of traffic during construction, operation and maintenance of the transit facilities within the Interstate right-of-way. Traffic analysis will be essential in determining the effects of the transit proposal. We are especially interested in the proposed transit center and ramp near the H-1 and H-2 Interchange.

Be advised, the FHWA Division Office has a role in approving roadway geometric design exceptions on the National Highway System (NHS). Should your engineering staff anticipate that design exceptions will be needed for the transit proposal, please seek early coordination with the Hawaii Department of Transportation Highways Division and FHWA.

Our office will need to assess the environmental impacts before approving Interstate airspace and design exceptions. As a cooperating agency, we will be looking to the evaluations performed in the EIS to serve as the basis for our environmental decision document. Our initial review of the analysis within the Interstate right-of-way discussed in this draft EIS does not raise any areas of concern. We do ask to be kept apprised of proposed design exceptions along the NHS and will be interested in the public comments to ensure areas of concern are not overlooked.

Mr. Yoshioka, City and County of Honolulu

DATE

Page 2

Program specialists in our office reviewed the document and have the following general comments for your consideration:

1) Ridership numbers cited are based on a complete system. It is difficult to determine ridership and benefits during the estimated 9 years of build-out. We suggest ridership numbers be run in conjunction with the proposed construction phasing to show how the transit system would function at anticipated phases of construction.

2) We see a wonderful opportunity to weave concepts of Context Sensitive Solutions (CSS) into design of the structures and transit stations. Measures such as reflecting the character of communities, and incorporating resources that must be removed (eg trees) into the design of stations are ideas that have been successfully applied elsewhere.

3) In the Kaka'ako area, the proposal is within close proximity of structures. We applaud the City for identifying the impacts and are keenly interested in the mitigation measures for impacts of lighting, noise during operation and maintenance, vibrations, and changes to natural light.

4) Have VMTs been revisited recently? Given the spike in fuel costs, we have seen a sizeable drop in VMTs travelled at a national level.

5) Check with Civil Defense regarding all-hazard plans. Additionally coordinate with Federal Protective Services and General Service Administration regarding security and transit system's proximity to Federal Building on Halekauwila Street.

6) Will bicycles be allowed on transit? If not, will there be a secure area for parking bicycles?

7) Impacts to street tree branches are addressed, but compaction at the root zone is not discussed. We suggest construction fencing around trees and no disturbance within the "drip zone".

8) Ke'ehi Lagoon Park is used for many cultural and recreational events. Encourage the project team to coordinate with users to discuss access and parking impacts.

9) Is the cost analysis tied to the CPI urban index? State DOT applies a 4% factor to each year until expenditure.

10) Design visualization shows piers near travel lanes without any barrier. We suggest inclusion of barrier into photo simulations if barrier is likely.

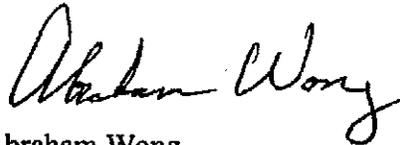
Mr. Yoshioka, City and County of Honolulu  
DATE  
Page 3

11) The discussion of de minimis and Ke'ehi Lagoon should be revisited. The intent of 4(f) remains avoiding impact to 4(f) properties if possible. De minimis does not change this intent.

12) Our experience has been that impact to a National Historic Landmark requires close coordination with the State Historic Preservation Division, National Park Service and Advisory Council. We suggest coordination efforts include discussions with these interested parties.

Should you have any questions regarding any of the above comments, please call Jodi Chew at 541-2700 extension 328.

Sincerely,



Abraham Wong  
Division Administrator  
FHWA Hawaii Division

cc: Jodi Chew, FHWA  
Eric Worrell, FHWA  
Elizabeth Fischer, FHWA  
Brennon Morioka, HDOT  
Jiro Sumada, HDOT  
Glenn Yasui, HDOT  
Ken Tatsuguchi, HDOT



U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION IX  
Arizona, California,  
Hawaii, Nevada, Guam  
American Samoa,  
Northern Mariana Islands

201 Mission Street  
Suite 1650  
San Francisco, CA 94105-1839  
415-744-3133  
415-744-2726 (fax)

Barry Fukunaga  
Hawaii Department of Transportation  
869 Punchbowl St., Suite 509  
Honolulu, HI 96813

Re: Invitation to be a Cooperating Agency in the Environmental Review Process for the  
Honolulu High-Capacity Transit Corridor Project

Dear Mr. Fukunaga:

The Federal Transit Administration (FTA), in cooperation with the City and County of Honolulu, Department of Transportation Services (DTS) is initiating the preparation on a proposal by the City and County of Honolulu to implement a fixed-guideway transit system in the corridor between Kapolei and the University of Hawai'i at Mānoa with a branch to Waikīkī. Alternatives proposed to be considered in the draft EIS include No Build and two Fixed Guideway Transit alternatives.

The purpose of the project, as currently defined, is to provide high-capacity, high-speed transit in the highly congested east-west transportation corridor between Kapolei and the University of Hawai'i at Mānoa, as specified in the 2030 O'ahu Regional Transportation Plan (ORTP). The project is intended to provide faster, more reliable public transportation services in the corridor than those currently operating in mixed-flow traffic, to provide basic mobility in areas of the corridor where people of limited income live, and to serve rapidly developing areas of the corridor. The project would also provide an alternative to private automobile travel and improve transit linkages within the corridor. Implementation of the project, in conjunction with other improvements included in the ORTP, would moderate anticipated traffic congestion in the corridor. The project also supports the goals of the O'ahu General Plan and the ORTP by serving areas designated for urban growth.

The Honolulu High-Capacity Transit Corridor Project proposed improvements will require the State of Hawai'i Department of Transportation (HDOT) approval related to use of state right of way, so we are formally requesting the HDOT to be a cooperating agency. The enclosed scoping information packet provides more details including a preliminary schedule.

FTA seeks the HDOT's cooperation in coordinating and determining effects of the proposed construction of the build alternatives under study and associated facilities on the Honolulu High-Capacity Transit Corridor Project, including those related to other project alternatives, environmental consequences, and mitigation. You can expect that the EIS will, to the greatest extent possible, satisfy the HDOT statutory responsibilities and concerns. The environmental documentation will address environmental and programmatic concerns identified by the HDOT.

and will be sufficiently detailed to enable the HDOT to grant necessary permits or other approvals that may ensue from the build alternatives under study. If at any point in the process your needs are not being met, please let us know. We expect that at the end of the process the EIS will satisfy your NEPA requirements.

We are providing a copy of the Federal Register Notice of Intent with this letter. Scoping materials are also available on the project website at <http://www.honolulutransit.org>. The interagency scoping meeting will be held on the following date and location:

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We look forward to your response to this request and your role as a cooperating agency on this project. If you have questions or would like to discuss in more detail the project or our agencies' respective roles and responsibilities during the preparation of this EIS, please contact Mr. Ted Matley at (415) 744-2590 or Mr. Toru Hamayasu of DTS at (808) 768-8344. This contact information supercedes the information provided in the Notice of Intent. A City and County of Honolulu project representative will be contacting your office as the project proceeds.

Sincerely,

  
Leslie T. Rogers  
Regional Administrator

Enclosures (3):

1. Scoping Information Packet/Schedule
2. Federal Register NOI
3. Draft Coordination Plan

cc: City and County of Honolulu, Department of Transportation Services

LINDA LINGLE  
GOVERNOR



TP 231316  
BARRY FUKUNAGA  
DIRECTOR

Deputy Directors  
MICHAEL D. FORMBY  
FRANCIS PAUL KEENO  
BRENNON T. MORIOKA  
BRIAN H. SEKIGUCHI

STATE OF HAWAII  
DEPARTMENT OF TRANSPORTATION  
869 PUNCHBOWL STREET  
HONOLULU, HAWAII 96813-5097

IN REPLY REFER TO:

HWY-PS  
2.5604

October 5, 2007

Mr. Leslie Rogers  
Regional Administrator, Region IX  
U. S. Department of Transportation  
Federal Transit Administration  
201 Mission Street, Suite 1650  
San Francisco, California 94105-1839

Oct 11 8 35 AM '07  
DTS  
TRANS PLANNING

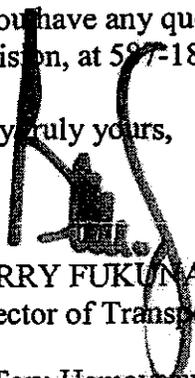
Dear Mr. Rogers:

Subject: Invitation to Be a Cooperating Agency in the Environmental Review Process for the Honolulu High-Capacity Transit Corridor Project.

We appreciate the invitation and agree to be a cooperating agency for purposes of NEPA compliance.

If you have any questions, please contact Ronald Tsuzuki, Head Planning Engineer, Highways Division, at 597-1830.

Very truly yours,

  
BARRY FUKUNAGA  
Director of Transportation

c: Toru Hamayasu - DTS  
FHWA

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

850 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 18, 2008

RT8/08-274368

Honorable Brennon Morioka, Director  
Department of Transportation  
State of Hawaii  
869 Punchbowl Street  
Honolulu, Hawaii 96813-5097

Dear Mr. Morioka:

**Subject: Honolulu High-Capacity Transit Corridor Project  
Cooperating Agency Project Update**

Thank you for agreeing to become involved in the environmental review process for the Honolulu High-Capacity Transit Corridor Project as a Cooperating Agency. Pursuant to stipulations in the National Environmental Policy Act (NEPA), Section 6002 of the *Safe, Accountable, Flexible, Efficient, Transportation Equity Act—A Legacy for Users* (SAFETEA-LU) guidance for federally funded projects, Chapter 343 of the Hawaii Revised Statutes, and your participation as a Cooperating Agency with the Project, the City and County of Honolulu Department of Transportation Services (DTS) is providing an internal and confidential intergovernmental copy of the Administrative Draft Environmental Impact Statement (EIS) for your review and comment.

DTS also requests to formally present an update on the project to answer any questions that your agency may have regarding the project. This briefing will provide an overall project update and will allow discussion of any specific questions and/or concerns about this project.

Any formal comment regarding this intergovernmental review of the Administrative Draft EIS is requested by September 17, 2008, and should be addressed to:

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

<b>HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT</b>	REVIEWER: Hawaii Department of Transportation
<b>COMMENT SHEET</b>	DATE: PAGE 1 of
DOCUMENT NAME AND DATE:	RESPONDER:
	DATE:

COMMENT NUMBER	SECTION NO. / PAGE NO.	COMMENT TYPE	COMMENT	RESPONSE	ACTION CODE	RESPONSE CODE
1	Page 1-16, Table 1-3		With average speed in the 30's mph, it's LOS F. Zipperlane has average speed of 50 mph with a LOS D. The average speed and LOS level doesn't seem to make sense.			
2	Page 2-8, 1 <sup>st</sup> paragraph		"The four panel members eliminated proprietary technologies, meaning that selection of one of those technologies would have required all future purchases of vehicles or equipment to be from a single manufacturer." This reason, which limits the alternatives that is evaluated in the DEIS, is troubling. Proprietary technologies, by itself, aren't sufficient reason to eliminate an alternative. More substantial reasons, such as costs, operational characteristics not meeting purpose and need, etc., are needed.			
3	Page 3-44, Section 3.5.5		Construction-related Effects on Bicycle and Pedestrian Facilities: Access to existing HDOT's bicycle and pedestrian facilities during construction needs to remain. In addition, warning and/or notification signs of modifications to HDOT's bicycle and pedestrian facilities during the construction period is needed.			
4	Page 4-32, Section 6(f) Resources		While this section states that there's no 6(f) resources along the alignment, Neal S. Blaisdell Park have a plaque at the entrance stating that Land, Water, Conservation Funds was used, making it a 6(f) property.			
5	Page 4-111, Wildlife Survey		Wildlife field surveys and observations were conducted in September 2007 and bird point counts were conducted from December 2007 to January 2008. Depending when in the			

	along the Alignment:		month done, these surveys could miss the peak seabird fallout period (September 15 – December 15 annually) when nocturnally flying seabirds, especially fledgling on the way to sea, can become disoriented by exterior lighting. When disoriented, seabirds often collide with manmade structures, and if they are not killed outright, the dazed or injured birds are easy targets of opportunity for feral mammals. Of concern are the following three pelagic seabird species, Hawaiian Petrel ( <i>Pterodroma sandwichensis</i> ), Newell's Shearwater ( <i>Puffinus auricularis newelli</i> ), and Band-rumped Storm-Petrel ( <i>Oceanodroma castro</i> ). The petrel is listed as an endangered species, the shearwater as a threatened species, and the storm-petrel is a candidate species under the Endangered Species Act. Recommend bird counts be done at night during the peak fallout period.			
6	Page 4-149, Wildlife:		Dependent on the result of bird counts stated under Item 5 above, restriction for night work could be required during the peak seabird fallout period.			
7			Since proposed route appears to front the Honolulu Harbor near Piers 7-17 within the Highways right of way, HAR-EP would like to be a continued party in any further review to assure that access to our piers along Nimitz Highway is maintained.			
8			In addition they recommend that coordination with ATDC also be established as previous developers have included improvements along Nimitz Highway near the downtown station.			
9			AIR-EP has no comments on the EIS for the Airport Alternative			

COMMENT TYPE: E - Editorial  
D - Discretionary  
M - Mandatory

ACTION CODES: A - Initiator agrees and will comply / take action  
B - Initiator disagrees for reasons noted: discussion may be required  
C - Answer provided; no action needed

RESPONSE CODE: A - Accept  
N - Not acceptable  
D - Discussion Required



## **Participating Agency Letters**



U.S. Department  
of Transportation  
Federal Transit  
Administration

REGION IX  
Arizona, California,  
Hawaii, Nevada, Guam  
American Samoa,  
Northern Mariana Islands

201 Mission Street  
Suite 1650  
San Francisco, CA 94105-1839  
415-744-3133  
415-744-2726 (fax)

Lawrence T. Yamamoto  
U.S. Department of Agriculture (Natural Resource Conservation Service)  
P.O. Box 50004  
Honolulu, HI 96850-0050

Re: Invitation to Participate in the Environmental Review Process for the Honolulu High-Capacity Transit Corridor Project

Dear Mr. Yamamoto:

The Federal Transit Administration (FTA), in cooperation with the City and County of Honolulu, Department of Transportation Services (DTS) is initiating the preparation on a proposal by the City and County of Honolulu to implement a fixed-guideway transit system in the corridor between Kapolei and the University of Hawai'i at Mānoa with a branch to Waikīkī. Alternatives proposed to be considered in the draft EIS include No Build and two Fixed Guideway Transit alternatives. The purpose of the project, as currently defined, is to provide high-capacity, high-speed transit in the highly congested east-west transportation corridor between Kapolei and the University of Hawai'i at Mānoa, as specified in the 2030 O'ahu Regional Transportation Plan (ORTP). The enclosed scoping information packet provides more details. A preliminary coordination plan including a schedule also is enclosed.

Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users establishes an enhanced environmental review process for certain FTA projects, increasing the transparency of the process, as well as opportunities for participation. The requirements of Section 6002 apply to the project that is the subject of this letter. As part of the environmental review process for this project, the lead agencies must identify, as early as practicable, any other Federal and non-Federal agencies that may have an interest in the project, and invite such agencies to become participating agencies in the environmental review process.<sup>1</sup> Your agency has been identified preliminarily as one that may have an interest in this project; accordingly, you are being extended this invitation to become actively involved as a participating agency in the environmental review process for the project.

As a participating agency, you will be afforded the opportunity, together with the public, to be involved in defining the purpose of and need for the project, as well as in determining the range of alternatives to be considered for the project. In addition, you will be asked to:

- Provide input on the impact assessment methodologies and level of detail in your agency's area of expertise;
- Participate in coordination meetings, conference calls, and joint field reviews, as appropriate; and
- Review and comment on sections of the pre-draft or pre-final environmental documents to communicate any concerns of your agency on the adequacy of the document, the alternatives considered, and the anticipated impacts and mitigation.

<sup>1</sup> Designation as a "participating agency" does not imply that the participating agency supports the proposed project or has any jurisdiction over, or special expertise concerning the proposed project or its potential impacts. A "participating agency" differs from a "cooperating agency," which is defined in regulations implementing the National Environmental Policy Act as "any Federal agency other than a lead agency which has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (or a reasonable alternative) for legislation or other major Federal action significantly affecting the quality of the human environment." 40 C.F.R. § 1508.5.

Your agency does not have to accept this invitation. If, however, you elect not to become a participating agency, you must decline this invitation in writing, indicating that your agency has no jurisdiction or authority with respect to the project, no expertise or information relevant to the project, and does not intend to submit comments on the project. The declination may be transmitted electronically to [Ted.Matley@dot.gov](mailto:Ted.Matley@dot.gov); please include the title of the official responding. In order to give your agency adequate opportunity to weigh the relevance of your participation in this environmental review process, written response to this invitation are not due until after the interagency scoping meeting scheduled for March 28, 2007 from 10:00 a.m. to 12:00 p.m. at Honolulu Hale, Mission Memorial Auditorium at 558 South King Street, Honolulu, HI 96813. You or your delegate is invited to represent your agency at this meeting. Your agency will be treated as participating agency unless your written response declining such designation as outlined above is transmitted to this office not later than April 20, 2007.

Additional information will be forthcoming during the scoping process. If you have questions regarding this invitation, please contact Mr. Ted Matley at (415) 744-2590 or Mr. Toru Hamayasu of DTS at (808) 768-8344. This contact information supercedes the information provided in the Notice of Intent.

Sincerely,



Leslie T. Rogers  
Regional Administrator

Attachments: Scoping Information Packet  
Draft Coordination Plan

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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

March 18, 2008

RT3/08-253438

Mr. Lawrence Yamamoto, State Conservationist  
Natural Resources Conservation Service  
Hawaii State Office  
U. S. Department of Agriculture  
P. O. Box 50004  
300 Ala Moana Boulevard, Room 4-118  
Honolulu, Hawaii 96850-0050

Dear Mr. Yamamoto:

Subject: Honolulu High-Capacity Transit Corridor Project  
Farmland Protection Policy Act, Form NRCS-CPA-106

Pursuant to the Farmland Protection Policy Act, the City and County of Honolulu Department of Transportation Services (DTS) requests Farmland Conversion Impact Ratings for this project. Three copies of the partially completed Farmland Conversion Impact Rating form (NRCS-CPA-106) are enclosed.

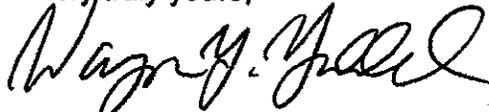
The DTS, in cooperation with the U. S. Department of Transportation Federal Transit Administration (FTA), is evaluating fixed-guideway alternatives that would provide high-capacity transit service on O'ahu. The project study area is the travel corridor between Kapolei and the University of Hawai'i at Mānoa. The east-west length of the corridor is approximately 23 miles from Kapolei to UH Manoa. Although there are multiple project alternatives, they all have the same alignment in the Ewa Plain area and, therefore, the same effect on farmland. All parts of the system would either be elevated or in an exclusive right-of-way. The guideway itself would be approximately 30 feet wide. The project also includes transit stations spaced approximately one mile apart, power stations, parking lots and maintenance areas.

As shown on the enclosed maps, the fixed guideway would traverse prime and unique soils on Leeward Oahu. Some of these areas are currently cultivated by tenant farmers. Most of these tenant farms are slated for future development. The Ewa Development Plan establishes an Urban Growth Boundary to protect areas of agricultural lands from development. The areas impacted by the Honolulu High-Capacity Transit Corridor Project are within the area designated for development.

Mr. Lawrence Yamamoto  
Page 2  
March 18, 2008

DTS would appreciate your cooperation in completing Parts II, IV, and V of Form NRCS CPA 106. If you have any questions or need further information, please feel free to contact Ms. Faith Miyamoto at (808) 768-8350.

Very truly yours,



WAYNE Y. YOSHIOKA  
Director

Enclosures (3 copies each):  
NRCS-CPA-106  
Project Alignment (4 sheets)

**FARMLAND CONVERSION IMPACT RATING  
FOR CORRIDOR TYPE PROJECTS**

<b>PART I (To be completed by Federal Agency)</b>		3. Date of Land Evaluation Request 1/24/08	4. Sheet 1 of 1
1. Name of Project Honolulu High Capacity Transit Corridor Pro.	5. Federal Agency Involved FTA		
2. Type of Project Mass Transit	6. County and State Honolulu, Hawaii		
<b>PART II (To be completed by NRCS)</b>		3. Date Request Received by NRCS	2. Person Completing Form
9. Does the corridor contain prime, unique statewide or local important farmland? (If no, the FPPA does not apply. Do not complete additional parts of this form)		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	4. Acres Impacted   Average Farm Size
5. Major Crop(s)	8. Farmable Land in Government Jurisdiction Acres: %		7. Amount of Farmland As Defined in FPPA Acres: %
6. Name Of Land Evaluation System Used	9. Name of Local Site Assessment System	10. Date Land Evaluation Returned by NRCS	

<b>PART III (To be completed by Federal Agency)</b>	Alternative Corridor For Segment			
	Corridor A	Corridor B	Corridor C	Corridor D
	A. Total Acres To Be Converted Directly	69		
	B. Total Acres To Be Converted Indirectly, Or To Receive Services	0		
C. Total Acres In Corridor	300			

<b>PART IV (To be completed by NRCS) Land Evaluation Information</b>				
A. Total Acres Prime And Unique Farmland				
B. Total Acres Statewide And Local Important Farmland				
C. Percentage Of Farmland In County Or Local Govt. Unit To Be Converted				
D. Percentage Of Farmland In Govt. Jurisdiction With Same Or Higher Relative Value				

**PART V (To be completed by NRCS) Land Evaluation Information Criterion Relative Value of Farmland to Be Serviced or Converted (Scale of 0 - 100 Points)**

<b>PART VI (To be completed by Federal Agency) Corridor Assessment Criteria (These criteria are explained in 7 CFR 658.5(c))</b>	Maximum Points			
1. Area in Nonurban Use	15			
2. Perimeter in Nonurban Use	10			
3. Percent Of Corridor Being Farmed	20			
4. Protection Provided By State And Local Government	20			
5. Size of Present Farm Unit Compared To Average	10			
6. Creation Of Nonfarmable Farmland	25			
7. Availability Of Farm Support Services	5			
8. On-Farm Investments	20			
9. Effects Of Conversion On Farm Support Services	25			
10. Compatibility With Existing Agricultural Use	10			
<b>TOTAL CORRIDOR ASSESSMENT POINTS</b>	<b>160</b>			

<b>PART VII (To be completed by Federal Agency)</b>				
Relative Value Of Farmland (From Part V)	100			
Total Corridor Assessment (From Part VI above or a local site assessment)	160			
<b>TOTAL POINTS (Total of above 2 lines)</b>	<b>260</b>			

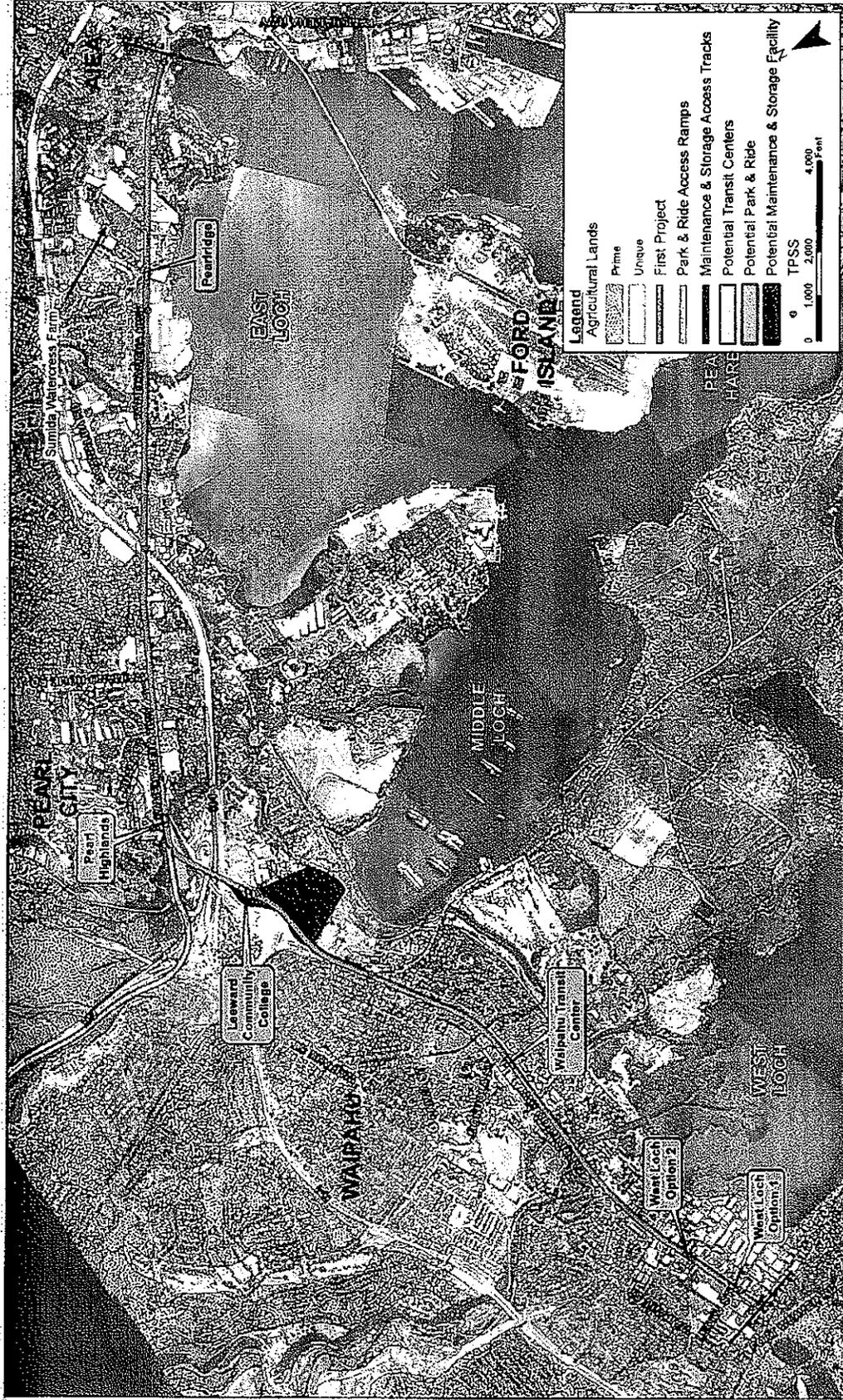
1. Corridor Selected:	2. Total Acres of Farmlands to be Converted by Project:	3. Date Of Selection:	4. Was A Local Site Assessment Used? YES <input type="checkbox"/> NO <input type="checkbox"/>
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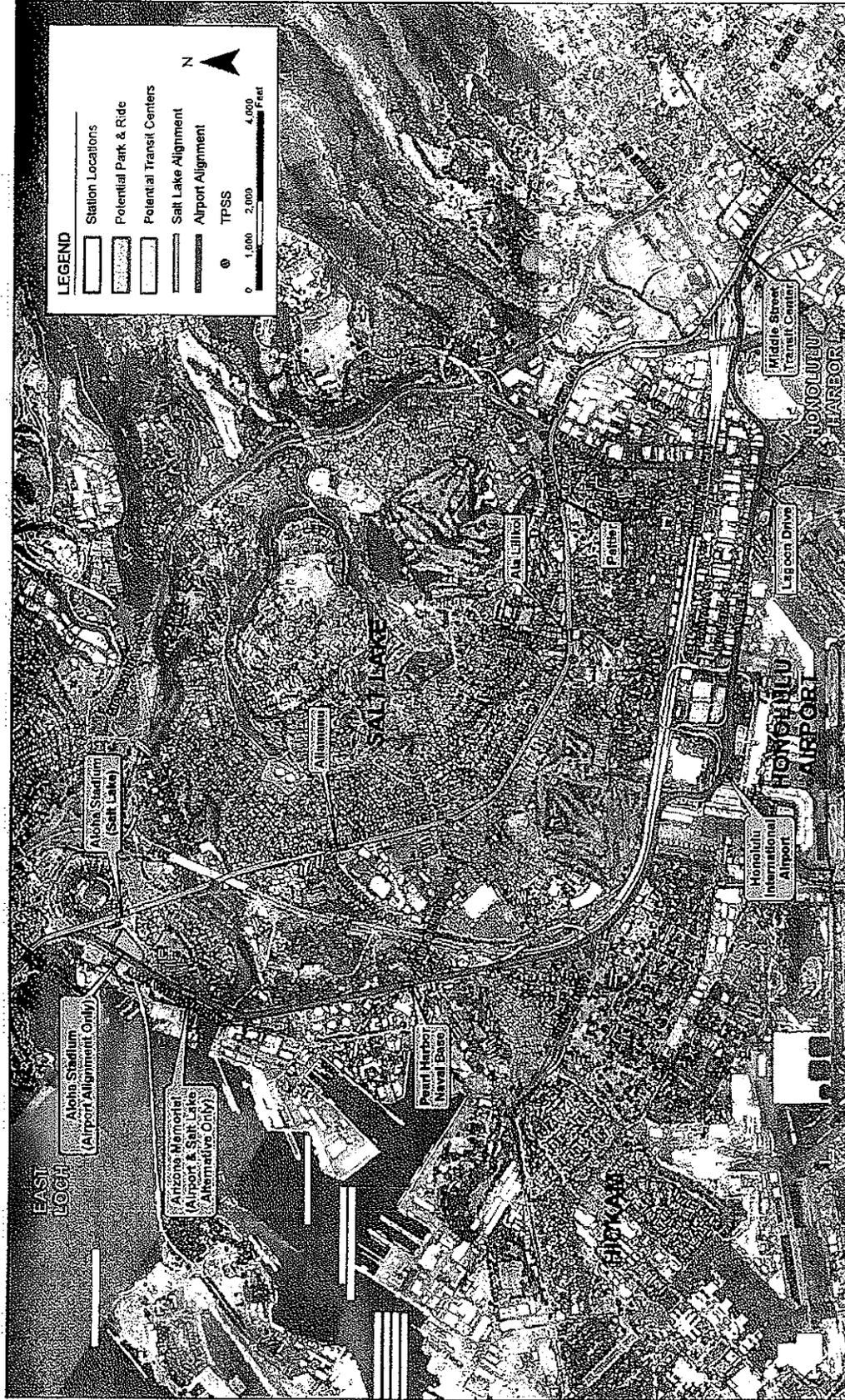
5. Reason For Selection:

Signature of Person Completing this Part: \_\_\_\_\_ DATE \_\_\_\_\_

**NOTE: Complete a form for each segment with more than one Alternate Corridor**

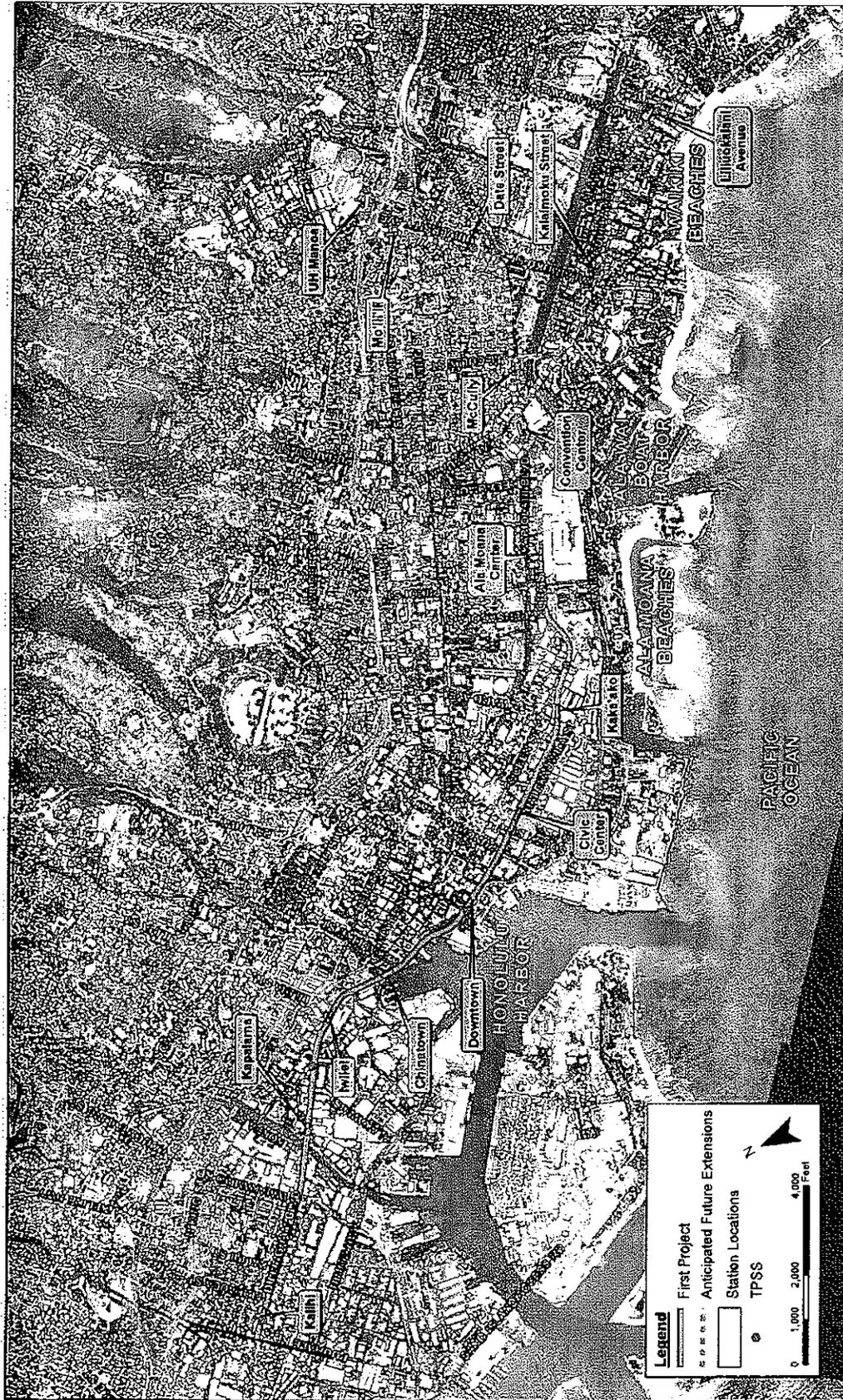






Honolulu High Capacity Transit Corridor

Section 4 Middle Street to UH Manoa





U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION IX  
Arizona, California,  
Hawaii, Nevada, Guam  
American Samoa,  
Northern Mariana Islands

201 Mission Street  
Suite 1650  
San Francisco, CA 94105-1839  
415-744-3133  
415-744-2726 (fax)

Captain Taylor Skardon  
Pearl Harbor Naval Station  
850 Ticonderoga St., Ste 100  
Pearl Harbor, HI 96860

Re: Invitation to be a Cooperating Agency in the Environmental Review Process for the  
Honolulu High-Capacity Transit Corridor Project

Dear Captain Skardon:

The Federal Transit Administration (FTA), in cooperation with the City and County of Honolulu, Department of Transportation Services (DTS) is initiating the preparation on a proposal by the City and County of Honolulu to implement a fixed-guideway transit system in the corridor between Kapolei and the University of Hawai'i at Mānoa with a branch to Waikīkī. Alternatives proposed to be considered in the draft EIS include No Build and two Fixed Guideway Transit alternatives.

The purpose of the project, as currently defined, is to provide high-capacity, high-speed transit in the highly congested east-west transportation corridor between Kapolei and the University of Hawai'i at Mānoa, as specified in the 2030 O'ahu Regional Transportation Plan (ORTP). The project is intended to provide faster, more reliable public transportation services in the corridor than those currently operating in mixed-flow traffic, to provide basic mobility in areas of the corridor where people of limited income live, and to serve rapidly developing areas of the corridor. The project would also provide an alternative to private automobile travel and improve transit linkages within the corridor. Implementation of the project, in conjunction with other improvements included in the ORTP, would moderate anticipated traffic congestion in the corridor. The project also supports the goals of the O'ahu General Plan and the ORTP by serving areas designated for urban growth.

The Honolulu High-Capacity Transit Corridor Project proposed improvements likely will require the U.S. Navy approval related to crossing U.S. Navy property, so we are formally requesting the U.S. Navy to be a cooperating agency. The enclosed scoping information packet provides more details including a preliminary schedule.

FTA seeks the U.S. Navy's cooperation in coordinating and determining effects of the proposed construction of the build alternatives under study and associated facilities on the Honolulu High-Capacity Transit Corridor Project, including those related to other project alternatives, environmental consequences, and mitigation. You can expect that the EIS will, to the greatest extent possible, satisfy the U.S. Navy statutory responsibilities and concerns. The

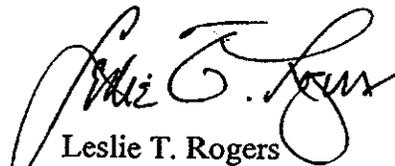
environmental documentation will address environmental and programmatic concerns identified by the U.S. Navy and will be sufficiently detailed to enable the U.S. Navy to grant necessary permits or other approvals that may ensue from the build alternatives under study. If at any point in the process your needs are not being met, please let us know. We expect that at the end of the process the EIS will satisfy your NEPA requirements.

We are providing a copy of the Federal Register Notice of Intent with this letter. Scoping materials are also available on the project website at <http://www.honolulustransit.org>. The interagency scoping meeting will be held on the following date and location:

- Honolulu Hale, Mission Memorial Auditorium at 558 South King Street, Honolulu, HI 96813 at March 28, 2007 from 10:00 a.m. to 12:00 p.m.

We look forward to your response to this request and your role as a cooperating agency on this project. If you have questions or would like to discuss in more detail the project or our agencies' respective roles and responsibilities during the preparation of this EIS, please contact Mr. Ted Matley at (415) 744-2590 or Mr. Toru Hamayasu of DTS at (808) 768-8344. This contact information supercedes the information provided in the Notice of Intent. An City and County of Honolulu project representative will be contacting your office as the project proceeds.

Sincerely,



Leslie T. Rogers  
Regional Administrator

Enclosures (3):

1. Scoping Information Packet/Schedule
2. Federal Register NOI
3. Draft Coordination Plan

cc: City and County of Honolulu, Department of Transportation Services



DEPARTMENT OF THE NAVY  
 COMMANDING OFFICER  
 NAVAL STATION  
 850 TICONDEROGA ST STE 100  
 PEARL HARBOR HI 96860-5102

ARE / ✓  
 ARE2 / 82

5000  
 Ser N00/163  
 23 Apr 07

Mr. Leslie T. Rogers  
 Regional Administrator  
 Federal Transit Administration  
 201 Mission Street  
 Suite 1650  
 San Francisco, CA 94105-1839

*change to participating  
 COS aware of the change*

Dear Mr. Rogers,

In response to your letter, which we received on March 26, 2007, Naval Station Pearl Harbor welcomes the opportunity to participate as a Cooperating Agency for the Honolulu High-Capacity Transit Corridor Project. This is an important initiative that will provide great benefit to the community and help abate the increasing traffic congestion on Oahu.

My point of contact is CDR Mike Zuccherro, NAVSTA PH Public Works Officer. He can be reached at (808) 471-2647 and e-mail at michael.zuccherro@navy.mil.

Sincerely,

TAYLOR W. SKARDON  
 Commanding Officer

Copy to:  
 City and County of Honolulu, Department of Transportation  
 Services

Blind copy to:  
 NAVFAC HI ARE2\*



COMMANDER  
NAVY REGION HAWAII  
NAVAL SURFACE GROUP MIDDLE PACIFIC



EXECUTIVE SUMMARY MEMORANDUM

8 May 2007

From: Lynn K. T. Tanaka, Regional Engineer Office

Subj: NAVY TO CHANGE TO PARTICIPATING AGENCY IN THE ENVIRONMENTAL REVIEW PROCESS FOR THE HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT

**BLUE:** The U.S. Department of Transportation, Federal Transit Administration (FTA) has requested that the Pearl Harbor Naval Station participate as a Cooperating Agency for the Honolulu High-Capacity Transit Corridor Project. Based on further review of the route and input from City and County of Honolulu, Department of Transportation Services (DTS), recommend that NAVSTA role change to Participating Agency.

**BACKGROUND:**

- The FTA in cooperation with the City and County of Honolulu, Department of Transportation Services (DTS) has initiated the proposal for the fixed-guideway transit system in the corridor between Kapolei and the University of Hawaii with a branch to Waikiki.
- Three alternatives to be considered in the Environmental Impact Statement:
  - o No Build Alternative
  - o Fixed Guideway Transit Alternative via Salt Lake Boulevard
  - o Fixed Guideway Transit Alternative serving Airport and Salt Lake (future fork in Salt Lake Boulevard route) but will not be included in the Finding of No Significant Impact (FONSI).

**DISCUSSION:**

- Lead Agencies – FTA and DTS. Agencies must identify and involve participation agencies; develop coordination plans; provide opportunities for public and participating agency involvement in defining the Purpose and Need and determining the range of alternatives; and collaborate with participating agencies in determining methodologies and the level of detail for the analysis of the alternatives
- Cooperating Agencies – these are any Federal agency, other than a lead agency, that has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposed project or project alternative.
- Participating Agencies – these are agencies with an interest in the project. The standard for these agencies is more encompassing than the standard for cooperation agencies, therefore, cooperating agencies are participating agencies but not all participating agencies are cooperating agencies.
- Based on recommendations from DTS based on the preferred route of Salt Boulevard, NAVSTA should be a Participating Agency vice Cooperating Agency.
- Schedule of EIS Coordination Activities:
  - o Now – FTA letters of invitation to participate
  - o Mar/Apr – Project Scoping, meeting held on 28 Mar without Navy attendance however per DTS only scoping provided
  - o May to Dec 07 – ongoing consultation
  - o Spring 08 – Draft EIS
  - o Fall/Winter 08 - Preliminary Final and Final EIS
  - o Mid 2009 – Record of Decision

**RECOMMENDATION:**

None. For information only.

7p6/07-211815



DEPARTMENT OF THE NAVY

COMMANDING OFFICER  
NAVAL STATION  
850 TICONDEROGA ST STE 100  
PEARL HARBOR HI 96860-5102

5000  
Ser N00/209  
29 May 2007

Mr. Leslie T. Rogers  
Regional Administrator  
Federal Transit Administration, Region IX  
201 Mission Street, Suite 1650  
San Francisco, CA 94105-1839

Dear Mr. Rogers:

SUBJECT: HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT

In our letter dated April 23, 2007, Ser N00/163, Naval Station Pearl Harbor accepted your invitation to be a cooperating agency in the National Environmental Policy Act (NEPA) review process for the subject project.

Subsequent to our April 23, 2007 response, we have had further discussions regarding this matter. Based on our better understanding of the proposed project, we anticipate that the Navy's role in the project, if any, would be small due to the preferred route along Salt Lake Boulevard. At this time, we, therefore, do not think that cooperating agency status would be appropriate for Naval Station Pearl Harbor. Instead, we are prepared to participate in the subject project as a participating agency.

Also, based on our current understanding of the proposed project, a separate environmental impact statement will not be required under the Navy's NEPA regulations in conjunction with any Navy approval.

My point of contact is CDR Mike Zucchero, NAVSTA Pearl Harbor Public Works Officer. He can be reached at (808) 471-2647 and e-mail at michael.zucchero@navy.mil.

Sincerely,

TAYLOR W. SKARDON  
Commanding Officer

Copy to:  
City and County of Honolulu, Department of Transportation  
Services

JUN 5 2 18 PM '07  
TRANS PLANNING  
DTS

Blind copy to:  
CNRH N4 (L. Tanaka)  
NAVFAC Hawaii (PWD)

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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 18, 2008

RT8/08-274137

Commanding Officer Taylor W. Skardon  
Naval Station  
Department of the Navy  
850 Ticonderoga Street, Suite 100  
Pearl Harbor, Hawaii 96860-5102

Attention: Commander Mike Zucchero  
NAVSTA Pearl Harbor Public Works Officer

Dear Commanding Officer Skardon:

**Subject: Honolulu High-Capacity Transit Corridor Project  
Participating Agency Project Update**

Thank you for agreeing to become involved in the environmental review process for the Honolulu High-Capacity Transit Corridor Project as a Participating Agency. Pursuant to stipulations in the National Environmental Policy Act (NEPA), Section 6002 of the *Safe, Accountable, Flexible, Efficient, Transportation Equity Act—A Legacy for Users* (SAFETEA-LU) guidance for federally funded projects, and Chapter 343 of the Hawaii Revised Statutes, and your participation as a Participating Agency with the Project, the City and County of Honolulu Department of Transportation Services (DTS) is providing internal and confidential intergovernmental copies of the Purpose and Need for the Project and Alternatives Chapters from the Draft Environmental Impact Statement for your review and comment.

DTS also requests to formally present an update on the project. This briefing will provide an overall project update and will allow discussion of any specific questions and/or concerns about this project.

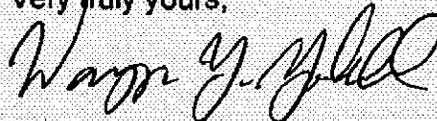
Any formal written comments are requested by September 17, 2008, and should be addressed to:

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Commanding Officer Taylor W. Skardon  
Page 2  
August 18, 2008

If you would like for project staff to provide an update, please contact Ms. Stephanie Roberts at (808) 768-6143 to schedule a meeting. We look forward to updating you about the project.

Very truly yours,

A handwritten signature in black ink, appearing to read "Wayne Y. Yoshioka". The signature is fluid and cursive, with the first name "Wayne" being the most prominent.

WAYNE Y. YOSHIOKA  
Director

Enclosure:  
1 CD containing the following:  
Purpose and Need for the Project  
Alternatives



U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION IX  
Arizona, California,  
Hawaii, Nevada, Guam  
American Samoa,  
Northern Mariana Islands

201 Mission Street  
Suite 1650  
San Francisco, CA 94105-1839  
415-744-3133  
415-744-2726 (fax)

Patrick Leonard  
US Fish & Wildlife Service, Pacific Island Office  
300 Ala Moana Blvd., Box 50088  
Honolulu, HI 96850

Re: Invitation to Participate in the Environmental Review Process for the Honolulu High-Capacity Transit Corridor Project

Dear Mr. Leonard:

The Federal Transit Administration (FTA), in cooperation with the City and County of Honolulu, Department of Transportation Services (DTS) is initiating the preparation on a proposal by the City and County of Honolulu to implement a fixed-guideway transit system in the corridor between Kapolei and the University of Hawai'i at Mānoa with a branch to Waikīkī. Alternatives proposed to be considered in the draft EIS include No Build and two Fixed Guideway Transit alternatives. The purpose of the project, as currently defined, is to provide high-capacity, high-speed transit in the highly congested east-west transportation corridor between Kapolei and the University of Hawai'i at Mānoa, as specified in the 2030 O'ahu Regional Transportation Plan (ORTP). The enclosed scoping information packet provides more details. A preliminary coordination plan including a schedule also is enclosed.

Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users establishes an enhanced environmental review process for certain FTA projects, increasing the transparency of the process, as well as opportunities for participation. The requirements of Section 6002 apply to the project that is the subject of this letter. As part of the environmental review process for this project, the lead agencies must identify, as early as practicable, any other Federal and non-Federal agencies that may have an interest in the project, and invite such agencies to become participating agencies in the environmental review process.<sup>1</sup> Your agency has been identified preliminarily as one that may have an interest in this project; accordingly, you are being extended this invitation to become actively involved as a participating agency in the environmental review process for the project.

As a participating agency, you will be afforded the opportunity, together with the public, to be involved in defining the purpose of and need for the project, as well as in determining the range of alternatives to be considered for the project. In addition, you will be asked to:

- Provide input on the impact assessment methodologies and level of detail in your agency's area of expertise;
- Participate in coordination meetings, conference calls, and joint field reviews, as appropriate; and
- Review and comment on sections of the pre-draft or pre-final environmental documents to communicate any concerns of your agency on the adequacy of the document, the alternatives considered, and the anticipated impacts and mitigation.

<sup>1</sup> Designation as a "participating agency" does not imply that the participating agency supports the proposed project or has any jurisdiction over, or special expertise concerning the proposed project or its potential impacts. A "participating agency" differs from a "cooperating agency," which is defined in regulations implementing the National Environmental Policy Act as "any Federal agency other than a lead agency which has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (or a reasonable alternative) for legislation or other major Federal action significantly affecting the quality of the human environment." 40 C.F.R. § 1508.5.

Your agency does not have to accept this invitation. If, however, you elect not to become a participating agency, you must decline this invitation in writing, indicating that your agency has no jurisdiction or authority with respect to the project, no expertise or information relevant to the project, and does not intend to submit comments on the project. The declination may be transmitted electronically to [Ted.Matley@dot.gov](mailto:Ted.Matley@dot.gov); please include the title of the official responding. In order to give your agency adequate opportunity to weigh the relevance of your participation in this environmental review process, written response to this invitation are not due until after the interagency scoping meeting scheduled for March 28, 2007 from 10:00 a.m. to 12:00 p.m. at Honolulu Hale, Mission Memorial Auditorium at 558 South King Street, Honolulu, HI 96813. You or your delegate is invited to represent your agency at this meeting. Your agency will be treated as participating agency unless your written response declining such designation as outlined above is transmitted to this office not later than April 20, 2007.

Additional information will be forthcoming during the scoping process. If you have questions regarding this invitation, please contact Mr. Ted Matley at (415) 744-2590 or Mr. Toru Hamayasu of DTS at (808) 768-8344. This contact information supercedes the information provided in the Notice of Intent.

Sincerely,



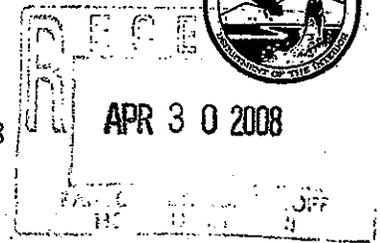
Leslie T. Rogers  
Regional Administrator

Attachments: Scoping Information Packet  
Draft Coordination Plan



## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Pacific Islands Fish and Wildlife Office  
300 Ala Moana Boulevard, Room 3-122, Box 50088  
Honolulu, Hawaii 96850



APR 29 2008

In Reply Refer To:  
2008-SL-0163

Mr. Darrell Sommerlatt  
Environmental Scientist  
Parsons Brinckerhoff, Incorporated  
1001 Bishop Street, Suite 2400  
Honolulu, Hawaii 96813

Subject: Species List Request for Honolulu High Capacity Transit Corridor Project Island of Oahu

Dear Mr. Sommerlatt:

Thank you for your letter dated March 25, 2008, received April 1, 2008, requesting information regarding threatened and endangered species and designated critical habitat that may occur within the proposed project location. The City and County of Honolulu, Department of Transportation Services (DTS), in cooperation with the Federal Transit Administration (FTA), have proposed to construct a public transit system with associated infrastructure through a 23-mile travel corridor between Kapolei and the University of Hawaii at Manoa which may include an extension to Waikiki.

We have reviewed the information you provided and pertinent information in our files, including data compiled by the Hawaii Biodiversity and Mapping Program. The federally endangered Kooloaula (*Abutilon menziesii*), Hawaiian hoary bat (*Lasirus cinereus semotus*), Hawaiian moorhen (*Gallinula chloropus sandvicensis*), Hawaiian coot (*Fulica alai*), Hawaiian stilt (*Himantopus mexicanus knudseni*) and Hawaiian Duck (*Anas wyvilliana*) have been observed in the vicinity of the proposed transit corridor. No federally proposed or designated critical habitats occur within the proposed project area.

The proposed activities of the transit corridor are occupied by a population of *Abutilon menziesii*. The State of Hawaii Habitat Conservation Plan for *A. menziesii* at Kapolei of March 2004, and the U.S. Fish and Wildlife Service (Service) Biological Opinion issued by our office on August 5, 2004 (1-2-2004-F-123), outlines conservation measures for *A. menziesii*. The development of the property has been taken into account in the Service's Biological Opinion. However, the DTS or the FTA will have to obtain the Certificate of Inclusion from Hawaii Department of Transportation. The DTS (and any subsequent landowners who agree to accept transfer of the Certificate of Inclusion) must agree to and implement the terms of the plan.

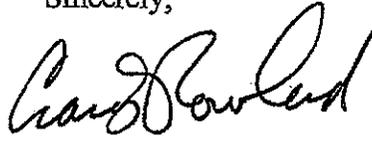
TAKE PRIDE<sup>®</sup>  
IN AMERICA 

Mr. Darrell Sommerlatt

2

We appreciate your efforts to conserve endangered species. If you have questions, please contact Aaron Nadig, Fish and Wildlife Biologist, Consultation and Technical Assistance Program (phone: 808-792-9466; fax: 808-792-9581).

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Leonard".

*SLV*  
Patrick Leonard  
Field Supervisor

cc:

City and County of Honolulu Department of Transportation Services  
Hawaii DOFAW

TP 106 196243



# United States Department of the Interior



NATIONAL PARK SERVICE  
Pacific West Region  
1111 Jackson Street, Suite 700  
Oakland, California 94607-4807

IN REPLY REFER TO:

A8817(PWR-C)

JAN 09 2006

JAN 13 1 48 PM '06

DTS  
TRANS PLANNING

Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> floor  
Honolulu, HI 96813  
Attn: Honolulu High-Capacity Transit Corridor Project  
[www.honolulutransit.org/get\\_involved](http://www.honolulutransit.org/get_involved)

Dear Sir:

This comment concerns the Honolulu High Capacity Transit Corridor Project and its impact on the safe arrival and departure of visitors to the USS Arizona Memorial, a unit of the National Park System. The USS Arizona Memorial receives 1.5 million visitors annually who arrive at the Visitor Center by public transit or private car.

The National Park Service understands the project is studying how to improve the ability of people to move in the highly congested east-west corridor between Kapolei and the University of Hawaii at Manoa. We also understand that over 60 percent of Oahu's population lives with the area served in this corridor and that the population is projected to grow.

Several of the alternatives do not consider a High Capacity Transit stop at the USS Arizona Memorial, instead proposing a single stop for the stadium across King Kamehameha Highway from the Memorial. The National Park Service opposes this concept because it encourages some of the 4,000 daily visitors to attempt the dangerous walk across this busy dual road into the Visitor Center rather than wait for the shuttle. Further, it will discourage or confuse our visitors about taking public transit, including bus service, increasing the number of cars attempting to make the dangerous left hand turn into the Memorial.

We believe these safety concerns point to the reason why the public and the Corridor Project will benefit from a transit stop for the USS Arizona Memorial, the most popular tourist destination on Oahu.

Thank you for providing this comment period. We remain interested in this project.

A copy of this letter has also been sent to the above website.

Sincerely,

Jonathan B. Jarvis  
Regional Director, Pacific West Region





U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION IX  
Arizona, California,  
Hawaii, Nevada, Guam  
American Samoa,  
Northern Mariana Islands

201 Mission Street  
Suite 1650  
San Francisco, CA 94105-1839  
415-744-3133  
415-744-2726 (fax)

Loyal Mehrhoff  
USGS PIERC  
677 Ala Moana Blvd., Suite 615  
Honolulu, HI 96813

Re: Invitation to Participate in the Environmental Review Process for the Honolulu High-Capacity Transit Corridor Project

Dear Mr. Mehrhoff:

The Federal Transit Administration (FTA), in cooperation with the City and County of Honolulu, Department of Transportation Services (DTS) is initiating the preparation on a proposal by the City and County of Honolulu to implement a fixed-guideway transit system in the corridor between Kapolei and the University of Hawai'i at Mānoa with a branch to Waikīkī. Alternatives proposed to be considered in the draft EIS include No Build and two Fixed Guideway Transit alternatives. The purpose of the project, as currently defined, is to provide high-capacity, high-speed transit in the highly congested east-west transportation corridor between Kapolei and the University of Hawai'i at Mānoa, as specified in the 2030 O'ahu Regional Transportation Plan (ORTP). The enclosed scoping information packet provides more details. A preliminary coordination plan including a schedule also is enclosed.

Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users establishes an enhanced environmental review process for certain FTA projects, increasing the transparency of the process, as well as opportunities for participation. The requirements of Section 6002 apply to the project that is the subject of this letter. As part of the environmental review process for this project, the lead agencies must identify, as early as practicable, any other Federal and non-Federal agencies that may have an interest in the project, and invite such agencies to become participating agencies in the environmental review process.<sup>1</sup> Your agency has been identified preliminarily as one that may have an interest in this project; accordingly, you are being extended this invitation to become actively involved as a participating agency in the environmental review process for the project.

As a participating agency, you will be afforded the opportunity, together with the public, to be involved in defining the purpose of and need for the project, as well as in determining the range of alternatives to be considered for the project. In addition, you will be asked to:

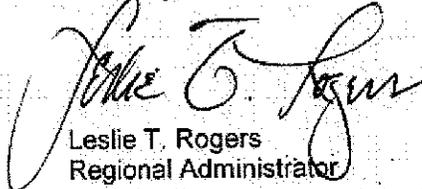
- Provide input on the impact assessment methodologies and level of detail in your agency's area of expertise;
- Participate in coordination meetings, conference calls, and joint field reviews, as appropriate; and
- Review and comment on sections of the pre-draft or pre-final environmental documents to communicate any concerns of your agency on the adequacy of the document, the alternatives considered, and the anticipated impacts and mitigation.

<sup>1</sup> Designation as a "participating agency" does not imply that the participating agency supports the proposed project or has any jurisdiction over, or special expertise concerning the proposed project or its potential impacts. A "participating agency" differs from a "cooperating agency," which is defined in regulations implementing the National Environmental Policy Act as "any Federal agency other than a lead agency which has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (or a reasonable alternative) for legislation or other major Federal action significantly affecting the quality of the human environment." 40 C.F.R. § 1508.5.

Your agency does not have to accept this invitation. If, however, you elect not to become a participating agency, you must decline this invitation in writing, indicating that your agency has no jurisdiction or authority with respect to the project, no expertise or information relevant to the project, and does not intend to submit comments on the project. The declination may be transmitted electronically to [Ted.Matley@dot.gov](mailto:Ted.Matley@dot.gov); please include the title of the official responding. In order to give your agency adequate opportunity to weigh the relevance of your participation in this environmental review process, written response to this invitation are not due until after the interagency scoping meeting scheduled for March 28, 2007 from 10:00 a.m. to 12:00 p.m. at Honolulu Hale, Mission Memorial Auditorium at 558 South King Street, Honolulu, HI 96813. You or your delegate is invited to represent your agency at this meeting. Your agency will be treated as participating agency unless your written response declining such designation as outlined above is transmitted to this office not later than April 20, 2007.

Additional information will be forthcoming during the scoping process. If you have questions regarding this invitation, please contact Mr. Ted Matley at (415) 744-2590 or Mr. Toru Hamayasu of DTS at (808) 768-8344. This contact information supercedes the information provided in the Notice of Intent.

Sincerely,



Leslie T. Rogers  
Regional Administrator

Attachments: Scoping Information Packet  
Draft Coordination Plan



U.S. Department  
of Transportation  
Federal Transit  
Administration

REGION IX  
Arizona, California,  
Hawaii, Nevada, Guam  
American Samoa,  
Northern Mariana Islands

201 Mission Street  
Suite 1650  
San Francisco, CA 94105-1839  
415-744-3133  
415-744-2726 (fax)

Ronnie Simpson  
Federal Aviation Administration  
Box 50244  
Honolulu, HI 96850

Re: Invitation to Participate in the Environmental Review Process for the Honolulu High-Capacity Transit Corridor Project

Dear Mr. Simpson:

The Federal Transit Administration (FTA), in cooperation with the City and County of Honolulu, Department of Transportation Services (DTS) is initiating the preparation on a proposal by the City and County of Honolulu to implement a fixed-guideway transit system in the corridor between Kapolei and the University of Hawai'i at Mānoa with a branch to Waikīki. Alternatives proposed to be considered in the draft EIS include No Build and two Fixed Guideway Transit alternatives. The purpose of the project, as currently defined, is to provide high-capacity, high-speed transit in the highly congested east-west transportation corridor between Kapolei and the University of Hawai'i at Mānoa, as specified in the 2030 O'ahu Regional Transportation Plan (ORTP). The enclosed scoping information packet provides more details. A preliminary coordination plan including a schedule also is enclosed.

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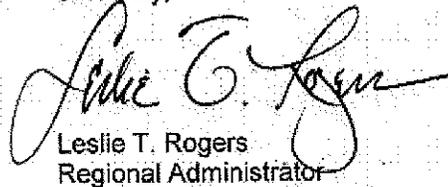
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Sincerely,



Leslie T. Rogers  
Regional Administrator

Attachments: Scoping Information Packet  
Draft Coordination Plan

TP1109-135406



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Western-Pacific Region  
Real Estate and Utilities Section, AHNL-54B

P. O. Box 50109  
Honolulu, Hawaii 96850-5000

January 5, 2006

Mr. Kenneth Hamayasu, Project  
Manager  
Department of Transportation  
Services  
City and County of Honolulu  
650 South King Street, 3rd Floor  
Honolulu, HI 96813

JAN 9 2 30 PM '06

TRANS PLANNING  
EIS

Dear Mr. Hamayasu:

Your letter of December 7, 2005, invited us to participate in a resource agency scoping meeting for the Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project.

As more specific plans and alternatives are developed, we ask that you continue to coordinate with us to determine any impacts that may affect aviation and the supporting infrastructure involved.

We appreciate this opportunity to cooperate with you on this project and look forward to its success. If there are any questions, I may also be contacted at 541-1236 or by email at darice.b.young@faa.gov.

Sincerely,

Darice B. N. Young  
Realty Contracting Officer

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

850 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 788-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUJI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 18, 2008

RT8/08-274209

Federal Aviation Administration  
Honolulu Control Facility  
U. S. Department of Transportation  
760 Worcester Avenue  
Honolulu, Hawaii 96818-5125

Dear Sir:

Subject: Honolulu High-Capacity Transit Corridor Project  
Participating Agency Project Update

Thank you for agreeing to become involved in the environmental review process for the Honolulu High-Capacity Transit Corridor Project as a Participating Agency. Pursuant to stipulations in the National Environmental Policy Act (NEPA), Section 6002 of the *Safe, Accountable, Flexible, Efficient, Transportation Equity Act—A Legacy for Users* (SAFETEA-LU) guidance for federally funded projects, and Chapter 343 of the Hawaii Revised Statutes, and your participation as a Participating Agency with the Project, the City and County of Honolulu Department of Transportation Services (DTS) is providing internal and confidential intergovernmental copies of the Purpose and Need for the Project and Alternatives Chapters from the Draft Environmental Impact Statement for your review and comment.

DTS also requests to formally present an update on the project. This briefing will provide an overall project update and will allow discussion of any specific questions and/or concerns about this project.

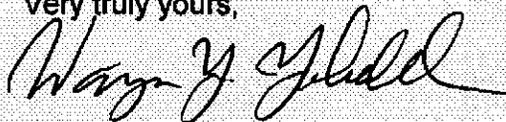
Any formal written comments are requested by September 17, 2008, and should be addressed to:

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Federal Aviation Administration  
Page 2  
August 18, 2008

If you would like for project staff to provide an update, please contact Ms. Stephanie Roberts at (808) 768-6143 to schedule a meeting. We look forward to updating you about the project.

Very truly yours,



WAYNE Y. YOSHIOKA  
Director

Enclosure:  
1 CD containing the following:  
Purpose and Need for the Project  
Alternatives



U.S. Department  
of Transportation  
Federal Transit  
Administration

REGION IX  
Arizona, California,  
Hawaii, Nevada, Guam,  
American Samoa,  
Northern Mariana Islands

201 Mission Street  
Suite 1650  
San Francisco, CA 94105-1639  
415-744-3133  
415-744-2726 (fax)

Dean Higuchi  
U.S. Environmental Protection Agency  
Box 50003  
Honolulu, HI 96813

Re: Invitation to Participate in the Environmental Review Process for the Honolulu High-Capacity Transit Corridor Project

Dear Mr. Higuchi:

The Federal Transit Administration (FTA), in cooperation with the City and County of Honolulu, Department of Transportation Services (DTS) is initiating the preparation on a proposal by the City and County of Honolulu to implement a fixed-guideway transit system in the corridor between Kapolei and the University of Hawai'i at Mānoa with a branch to Waikīkī. Alternatives proposed to be considered in the draft EIS include No Build and two Fixed Guideway Transit alternatives. The purpose of the project, as currently defined, is to provide high-capacity, high-speed transit in the highly congested east-west transportation corridor between Kapolei and the University of Hawai'i at Mānoa, as specified in the 2030 O'ahu Regional Transportation Plan (ORTP). The enclosed scoping information packet provides more details. A preliminary coordination plan including a schedule also is enclosed.

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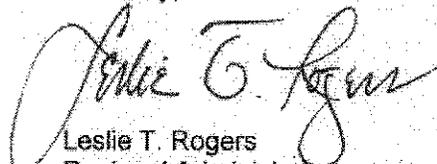
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Sincerely,



Leslie T. Rogers  
Regional Administrator

Attachments: Scoping Information Packet  
Draft Coordination Plan



U.S. EPA / OPA 002.

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION IX**

**75 Hawthorne Street  
San Francisco, CA 94105-3901**

January 9, 2006

Ms. Donna Turchie  
Federal Transit Administration  
Region IX  
201 Mission Street, Suite 2210  
San Francisco, CA 94105

**Subject: Scoping Comments for High-Capacity Transit Improvements in the  
Southern Corridor, Honolulu, HI**

Dear Ms. Turchie:

The U.S. Environmental Protection Agency (EPA) has reviewed the Federal Register Notice published on December 7, 2005, requesting comments on the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) decision to prepare a Draft Environmental Impact Statement (DEIS) for High-Capacity Transit Improvements in the Southern Corridor in Honolulu, Hawaii. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act.

This project may require a Clean Water Act Section 404 individual permit from the Army Corps of Engineers. If impacts to waters of the United States require an individual permit, EPA recommends initiation of the "Memorandum of Understanding for the NEPA/Clean Water Act Section 404 Integration Process for Surface Transportation Projects in the State of Hawaii" (NEPA/404 MOU). This project will benefit from early and continued interagency coordination among resource agencies by ensuring that the Clean Water Act Section 404(b)(1) Guidelines are followed (40 CFR 230). EPA's additional concerns, as described in the enclosed detailed comments, focus on impacts to air quality, invasive species management, environmental justice, and indirect and cumulative impacts.

We appreciate the opportunity to provide comments on the preparation of the DEIS, and look forward to continued participation in this process as more information becomes available. When the Alternatives Analysis and DEIS are released for public review, please send two copies

to the address above (mail code CED-2). If you have any questions, please contact me at 415-972-3988, or Connell Dunning, the lead reviewer for this project. Connell can be reached at 415-947-4161 or [dunning.connell@epa.gov](mailto:dunning.connell@epa.gov).

Sincerely,



Duane James, Manager  
Environmental Review Office

Enclosure: EPA's Detailed Scoping Comments

CC: Nelson Sagum, Hawaii Department of Transportation  
Abraham Wong, Federal Highway Administration, Hawaii Division  
Alfred A. Tanaka, County and City of Honolulu Department of  
Transportation Services  
Ryan Smith, Oahu Invasive Species Committee

### **Interagency Coordination**

Should this project require a Clean Water Act (CWA) Section 404 individual permit from the Army Corps of Engineers (ACOE), the Environmental Protection Agency (EPA) recommends coordination with ACOE and EPA through the "Memorandum of Understanding for the National Environmental Policy Act/Clean Water Act Section 404 Integration Process for Surface Transportation Projects in the State of Hawaii" (NEPA/404 MOU). In addition, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) should coordinate with the Federal Highway Administration (FHWA) and Hawaii Department of Transportation (HDOT) to ensure that alternatives considered can be integrated with existing and future road improvements in the transit corridor.

### **Water Resources**

The Draft Environmental Impact Statement (DEIS) should disclose the approximate area of waters of the United States that occur within the study area of the proposed project, including permanent and intermittent streams and wetlands. The CWA Section 404(b)(1) Guidelines (Guidelines) at 40 CFR Part 230.10(a) state that "... no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences." FTA and DTS will have to demonstrate that potential impacts to waters of the United States have been avoided and minimized to the maximum extent practicable prior to obtaining a CWA Section 404 permit (40 CFR 230.10(a) and 230.10(d)). We urge FTA and DTS, in planning alternative designs for the project, to incorporate the following recommendations into the DEIS:

- Demonstrate that all potential impacts to waters of the United States have been avoided and minimized. If these resources cannot be avoided, the project-level analyses should clearly demonstrate how cost, logistical, or technological constraints preclude avoidance and minimization of impacts.
- Quantify the benefits from measures and modifications designed to avoid and minimize impacts to water resources for each alternative studied; for example, number of stream crossings avoided, acres of waters of the United States avoided, etc.
- Identify all protected resources with special designations and all special aquatic sites<sup>1</sup> and waters within state, local, and federal protected lands. Additional steps should be taken to avoid and minimize impacts to these areas.

---

<sup>1</sup> Special aquatic sites are defined at 40 CFR 230.40 – 230.45 and include wetlands, mud flats, vegetated shallows, coral reefs, and riffle and pool complexes.

The DEIS should also address techniques proposed for minimizing surface water contamination due to increased runoff from additional highway surfaces. The project will require a National Pollutant Discharge Elimination System (NPDES) permit and an accompanying Stormwater Pollution Prevention Plan (SWPPP). Where the proposed project will widen existing roads, the current stormwater detention basins and structures should be evaluated to determine if they will continue to be effective. If new stormwater detention facilities are needed, this provides an opportunity to work with municipal planners and vector control agencies to develop siting, design, and maintenance strategies that incorporate guidelines to minimize or eliminate mosquitoes and other vector species, in addition to stormwater control.

**Air Quality**

The DEIS should include a thorough analysis of impacts from the construction and operation of the proposed alternatives and should include estimates of all criteria pollutant emissions. EPA recommends including a Construction Emissions Mitigation Plan in the DEIS and adopting this plan in the Record of Decision. EPA recommends the following mitigation measures be included in the Construction Emissions Mitigation Plan in order to reduce impacts associated with vehicle emissions and other air toxics from construction-related activities:

- Establish an activity schedule designed to minimize traffic congestion around the construction site.
- Utilize EPA-registered particulate traps and other appropriate controls to reduce emissions of diesel particulate matter and other pollutants at the construction site.
- Locate construction equipment and staging zones away from sensitive receptors such as children and the elderly as well as away from fresh air intakes to buildings and air conditioners.
- Use low sulfur fuel (diesel with 15 parts per million or less) if available.
- Reduce use, trips, and unnecessary idling from heavy equipment.
- Lease newer and cleaner equipment (1996 or newer).
- Periodically inspect construction sites to ensure construction equipment is properly maintained at all times.

**Invasive Species**

In accordance with Executive Order 13112, EPA recommends that the DEIS identify proposed methods to minimize the spread of invasive species and utilize native plant and tree species where revegetation is planned. The islands of Hawaii are particularly vulnerable to invasive species, and construction associated with the project has the potential to aid in the

establishment of invasive plants along any newly disturbed corridors. EPA recommends that FTA and DTS coordinate invasive species management with local agencies and organizations, such as the Oahu Invasive Species Committee: a voluntary partnership organized to prevent new invasive species infestations on the island of Oahu, to eradicate incipient invasive species, and to stop established invasive species from spreading on Oahu (<http://www.hear.org/oisc/>). Measures to reduce the potential for the spread of invasive species will be more effective when they are coordinated with other ongoing planning efforts. Additional resources related to Federal and State programs to address invasive species can be found at: <http://www.invasivespeciesinfo.gov/>

### **Environmental Justice**

Executive Order 12898 addresses Environmental Justice in minority and low income populations, and the Council on Environmental Quality has developed guidance concerning how to address Environmental Justice in the environmental review process (<http://ceq.eh.doe.gov/nepa/regs/ej/justice.pdf>). The Federal Register Notice published for this project (December 7, 2005) states that numerous lower-income and minority workers live in the corridor outside the urban core and commute to work in the primary urban center. Community involvement activities supporting the project should include opportunities for incorporating public input into the facility area design and location process, especially from any members of the community who may benefit or be adversely affected by proposed project. The DEIS should identify whether the proposed alternatives may disproportionately and adversely affect low income or minority populations in the surrounding area and should provide appropriate mitigation measures for any adverse impacts.

### **Indirect Impacts**

EPA is concerned about the potential indirect impacts (40 CFR Part 1508(b)) of this project. The DEIS should discuss how the proposed project may affect the location and pattern of residential, commercial, and industrial development. The DEIS should also identify modifications to the transportation system that may provide new access to residential areas and open space and should discuss the potential for new access points to affect future development and land use changes. The DEIS should also address the feasibility, extent, and expected duration of potential mitigation measures.

### **Cumulative Impacts**

The DEIS should provide a thorough analysis of the cumulative impacts of the proposed project. Cumulative impacts analyses examine "the impact of the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions" (40 CFR Part 1508.7). The DEIS should identify cumulative impacts study areas relative to the resources of concern and should identify a baseline from which impacts are measured. The analysis should disclose the past, present, and reasonably foreseeable impacts on resources of concern from transportation and non-transportation activities and should analyze the rate of loss and magnitude (relative importance) of impacts to resources.



U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION IX  
Arizona, California,  
Hawaii, Nevada, Guam  
American Samoa,  
Northern Mariana Islands

201 Mission Street  
Suite 1650  
San Francisco, CA 94105-1839  
415-744-3133  
415-744-2726 (fax)

Woodrow Goins  
Federal Emergency Management Administration  
546 Bonney Loop  
Fort Schafter, HI 96858

Re: Invitation to Participate in the Environmental Review Process for the Honolulu High-Capacity Transit Corridor Project

Dear Mr. Goins:

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Sincerely,



Leslie T. Rogers  
Regional Administrator

Attachments: Scoping Information Packet  
Draft Coordination Plan

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

850 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 788-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 18, 2008

RT8/08-274206

Federal Emergency Management Agency  
1111 Broadway Street, Suite 1200  
Oakland, California 94607-4052

Dear Sir:

Subject: Honolulu High-Capacity Transit Corridor Project  
Participating Agency Project Update

Thank you for agreeing to become involved in the environmental review process for the Honolulu High-Capacity Transit Corridor Project as a Participating Agency. Pursuant to stipulations in the National Environmental Policy Act (NEPA), Section 6002 of the *Safe, Accountable, Flexible, Efficient, Transportation Equity Act—A Legacy for Users* (SAFETEA-LU) guidance for federally funded projects, and Chapter 343 of the Hawaii Revised Statutes, and your participation as a Participating Agency with the Project, the City and County of Honolulu Department of Transportation Services (DTS) is providing internal and confidential intergovernmental copies of the Purpose and Need for the Project and Alternatives Chapters from the Draft Environmental Impact Statement and also the Water Resources Technical Report for your review and comment.

DTS also requests to formally present an update on the project. This briefing will provide an overall project update and will allow discussion of any specific questions and/or concerns about this project.

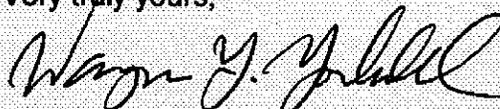
Any formal written comments are requested by September 17, 2008, and should be addressed to:

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Federal Emergency Management Agency  
Page 2  
August 18, 2008

If you would like for project staff to provide an update, please contact Ms. Stephanie Roberts at (808) 768-6143 to schedule a meeting. We look forward to updating you about the project.

Very truly yours,



WAYNE Y. YOSHIOKA  
Director

**Enclosure:**

1 CD containing the following:  
Purpose and Need for the Project  
Alternatives  
Water Resources Technical Report

TP 12/05-134133

LINDA LINGLE  
GOVERNOR



RUSS K. SAITO  
COMPTROLLER

KATHERINE H. THOMASON  
DEPUTY COMPTROLLER

**STATE OF HAWAII**

DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES  
P.O. BOX 119, HONOLULU, HAWAII 96810

(P)1299.5

DEC 23 2005

Dec 23 3 28 PM '05  
DTS  
TRANS PLANNING

Mr. Kenneth Hamayasu  
Transportation Planning Division  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Dear Mr. Hamayasu:

Subject: Honolulu High-Capacity Transit Corridor Project, EISPN

Thank you for the opportunity to comment on the Honolulu High-Capacity Transit Corridor Project. An improved transportation system would enhance peoples' quality of life, safety, and economic well being. I request that you keep us informed and work with us throughout the project's planning, design, construction and operation phases as we expect to be directly affected by most of the alternatives proposed. To cite some examples:

1. Alternative 3: Managed Lane Alternative will likely directly affect our Aloha Stadium Complex.
2. Alternative 4: Fixed-Guideway Alternative support facilities and other impacts could directly affect our facilities at Kakuhihewa (Kapolei State Office Building), Aloha Stadium, Liliha Civic Center (O. R. & L. Building and site), the State Capitol, and other State buildings, and State-owned land. Alternative 4c may cut off the main vehicular access to the Capitol via Miller Street if the proposed tunnel below Beretania Street mauka of the Capitol, is built.

The State will work with you to address any and all costs it would incur as a result of this project.

Mr. Kenneth Hamayasu  
(P)1299.5  
Page 2

If you have any questions, please call me at 586-0400, email me at [russ.k.saito@hawaii.gov](mailto:russ.k.saito@hawaii.gov), or have your staff call Mr. Bruce Bennett of the Public Works Division at 586-0491, email [bruce.e.bennett@hawaii.gov](mailto:bruce.e.bennett@hawaii.gov).

Sincerely,



RUSS K. SAITO  
State Comptroller

c: Ms. Genevieve Salmonson, OEQC

LINDA LINGLE  
GOVERNOR



*muc*

RUSS K. SAITO  
COMPTROLLER

TP 202195

**STATE OF HAWAII**  
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES  
P.O. BOX 119, HONOLULU, HAWAII 96810

MAR 30 2007

DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES  
TRANSPORTATION SERVICES

07 APR 2 P 2:19

RECEIVED  
(P)1070.7

Mr. Melvin N. Kaku, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Dear Mr. Kaku:

Subject: Invitation to Participate in the Environmental Review Process for the  
Honolulu High-Capacity Transit Corridor Project

Thank you for your March 16, 2007 letter. The Department of Accounting and General Services (DAGS) requests that we be included as a participating agency.

We have issues of concern that we have made known previously, as the currently preferred route will impact our facilities at Aloha Stadium, Liliha Civic Center (Kaaahi Street extension) and in the State's Capital District.

If you have any questions, please call me at 586-0400 or have your staff call Mr. Bruce Bennett of the Public Works Division at 586-0491.

Sincerely,

RUSS K. SAITO  
State Comptroller

c: Ms. Genevieve Salmonson, DOH-OEQC

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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 788-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 11, 2008

RT8/08-274204

Honorable Russ K. Saito, State Comptroller  
Department of Accounting and General Services  
State of Hawaii  
P. O. Box 119  
Honolulu, Hawaii 96810

Dear Mr. Saito:

**Subject: Honolulu High-Capacity Transit Corridor Project  
Participating Agency Project Update**

Thank you for agreeing to become involved in the environmental review process for the Honolulu High-Capacity Transit Corridor Project as a Participating Agency. Pursuant to stipulations in the National Environmental Policy Act (NEPA), Section 6002 of the *Safe, Accountable, Flexible, Efficient, Transportation Equity Act—A Legacy for Users* (SAFETEA-LU) guidance for federally funded projects, and Chapter 343 of the Hawaii Revised Statutes, and your participation as a Participating Agency with the Project, the City and County of Honolulu Department of Transportation Services (DTS) is providing internal and confidential intergovernmental copies of the the Purpose and Need for the Project and Alternatives Chapters from the Draft Environmental Impact Statement for your review and comment.

DTS also requests to formally present an update on the project. This briefing will provide an overall project update and will allow discussion of any specific questions and/or concerns about this project.

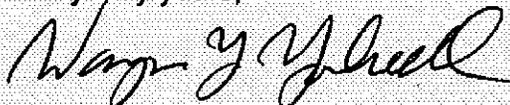
Any formal written comments are requested by September 17, 2008, and should be addressed to:

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Mr. Russ K. Saito  
Page 2  
August 18, 2008

If you would like for project staff to provide an update, please contact Ms. Stephanie Roberts at (808) 768-6143 to schedule a meeting. We look forward to updating you about the project.

Very truly yours,



WAYNE Y. YOSHIOKA  
Director

Enclosure:  
1 CD containing the following:  
Purpose and Need for the Project  
Alternatives

LINDA LINGLE  
GOVERNOR



RUSS K. SAITO  
COMPTROLLER

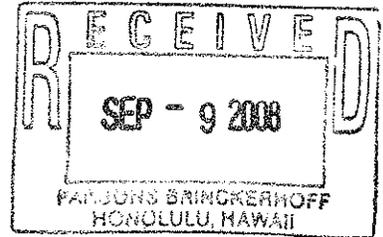
BARBARA A. ANNIS  
DEPUTY COMPTROLLER

STATE OF HAWAII  
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES

P.O. BOX 119, HONOLULU, HAWAII 96810

(P)1296.8

SEP - 8 2008



Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Dear Mr. Yoshioka:

Subject: Honolulu High-Capacity Transit Corridor Project  
Participating Agency Project Update

Thank you for your letter of August 18, 2008. The Department of Accounting and General Services, as an update to our letter of March 28, 2008, remains prepared to work with the Department of Transportation Services on two areas of concern. The first is the effect this project may have on Aloha Stadium and the second is its effect on our Liliha Civic Center.

Aloha Stadium

1. We are pleased that the proposed alignment is far less intrusive into the stadium property, as it now more closely follows Salt Lake Boulevard. As stated previously, the State Fair and other events use the parking lot and were transversed by the former alignment. In addition, if there is a need in the future to build a new facility on the property, such as a replacement stadium, the updated alignment would facilitate construction. The impact on the Stadium would be further mitigated if the system ran past the airport, thereby eliminating the need for a traction power station on the stadium property.
2. Disturbance during construction and operation of the transit system, including losses of parking and access, and additional noise, would adversely affect stadium operations and the outlying community.
3. Our need to provide operational security and safety for stadium workers, event attendees, and other event visitors requires that pedestrian walkways be independent of vehicular traffic and that transit station and park and ride facilities be securable daily from stadium, parking, and other ancillary areas.

Mr. Wayne Yoshioka  
(P)1296.8  
Page 2

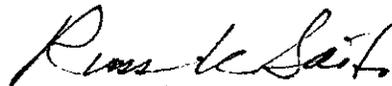
4. The park and ride, transit station, traction power station (proposed for the Salt Lake Boulevard alternative only), and the transit line itself would each eliminate much of our parking without compensation or providing in-kind replacement parking capacity. This would exacerbate the existing shortage of parking during major events. A mutually beneficial solution might be for the City to build a new multi-level parking structure for shared use between park and ride and major stadium event customers.
5. To address traffic congestion and provide the opportunity to increase parking, we suggest that the City eliminate the far west section of Salt Lake Boulevard (SLB) that runs through the Stadium's Kamehameha lot and bus lot. This would create a contiguous lot, and would require the removal of traffic lights at the corners of Essex Road/Main Salt Lake Gate 1 (MSLG 1) and SLB/Kamehameha Highway, and the establishment of two-way traffic on Essex Road. Essex Road and the intersection at Essex Road/Kamehameha Highway would have to be modified to accommodate heavier traffic flow in this area. New ingress/egress options for MSLG 1 and Kamehameha lot would have to be discussed as well.

#### Liliha Civic Center

There have been no discussions with us about the Liliha Civic Center property that is across King Street from Aala Park. We note that you are now proposing placement of a traction power station near or on this site. We request that it be relocated off-site, and will reserve further comments pending further information, meetings and discussions on this matter.

If you have any questions, please call me at 586-0400 or have your staff call Mr. Bruce Bennett of the Public Works Division at 586-0491.

Sincerely,



RUSS K. SAITO  
State Comptroller

c: The Honorable Brennan Morioka, Director, DOT  
Mr. Scott Chan, Aloha Stadium Manager  
Ms. Stephanie Roberts, PB Americas

March 16, 2007

Mr. Theodore Liu, Director  
Hawaii Department Of Business, Economic Development & Tourism  
PO BOX 2359  
Honolulu, HI 96804

Re: Invitation to Participate in the Environmental Review Process for the Honolulu High-Capacity Transit Corridor Project

Dear Mr. Liu:

The Federal Transit Administration (FTA), in cooperation with the City and County of Honolulu, Department of Transportation Services (DTS) is initiating the preparation on a proposal by the City and County of Honolulu to implement a fixed-guideway transit system in the corridor between Kapolei and the University of Hawai'i at Mānoa with a branch to Waikīkī. Alternatives proposed to be considered in the draft EIS include No Build and two Fixed Guideway Transit alternatives. The purpose of the project, as currently defined, is to provide high-capacity, high-speed transit in the highly congested east-west transportation corridor between Kapolei and the University of Hawai'i at Mānoa, as specified in the 2030 O'ahu Regional Transportation Plan (ORTP). The enclosed scoping information packet provides more details. A preliminary coordination plan including a schedule also is enclosed.

Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users establishes an enhanced environmental review process for certain FTA projects, increasing the transparency of the process, as well as opportunities for participation. The requirements of Section 6002 apply to the project that is the subject of this letter. As part of the environmental review process for this project, the lead agencies must identify, as early as practicable, any other Federal and non-Federal agencies that may have an interest in the project, and invite such agencies to become participating agencies in the environmental review process.<sup>1</sup> Your agency has been identified preliminarily as one that may have an interest in this project; accordingly, you are being extended this invitation to become actively involved as a participating agency in the environmental review process for the project.

As a participating agency, you will be afforded the opportunity, together with the public, to be involved in defining the purpose of and need for the project, as well as in determining the range of alternatives to be considered for the project. In addition, you will be asked to:

---

<sup>1</sup> Designation as a "participating agency" does not imply that the participating agency supports the proposed project or has any jurisdiction over, or special expertise concerning the proposed project or its potential impacts. A "participating agency" differs from a "cooperating agency," which is defined in regulations implementing the National Environmental Policy Act as "any Federal agency other than a lead agency which has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (or a reasonable alternative) for legislation or other major Federal action significantly affecting the quality of the human environment." [40 C.F.R. § 1508.5](#).

- Provide input on the impact assessment methodologies and level of detail in your agency's area of expertise;
- Participate in coordination meetings, conference calls, and joint field reviews, as appropriate; and
- Review and comment on sections of the pre-draft or pre-final environmental documents to communicate any concerns of your agency on the adequacy of the document, the alternatives considered, and the anticipated impacts and mitigation.

If you elect to become a participating agency, you must accept this invitation in writing. The acceptance may be transmitted electronically to [fmiyamoto@honolulu.gov](mailto:fmiyamoto@honolulu.gov); please include the title of the official responding. In order to give your agency adequate opportunity to weigh the relevance of your participation in this environmental review process, written responses to this invitation are not due until after the interagency scoping meeting, scheduled for March 28, 2007 from 10:00 a.m. to 12:00 p.m. at Honolulu Hale, Mission Memorial Auditorium at 558 South King Street, Honolulu, HI 96813. You or your delegate is invited to represent your agency at this meeting. Written responses accepting designation as participating agencies should be transmitted to this office not later than April 20, 2007.

Additional information will be forthcoming during the scoping process. If you have questions regarding this invitation, please contact Mr. Toru Hamayasu of DTS at (808) 768-8344.

Sincerely,

Melvin Kaku, Director  
Department of Transportation Services

Enclosures:  
Scoping Information Package

LINDA LINGLE  
GOVERNOR

MAJOR GENERAL ROBERT G. F. LEE  
DIRECTOR OF CIVIL DEFENSE

EDWARD T. TEIXEIRA  
VICE DIRECTOR OF CIVIL DEFENSE



**STATE OF HAWAII**  
**DEPARTMENT OF DEFENSE**  
**OFFICE OF THE DIRECTOR OF CIVIL DEFENSE**  
3949 DIAMOND HEAD ROAD  
HONOLULU, HAWAII 96816-4495

April 16, 2007

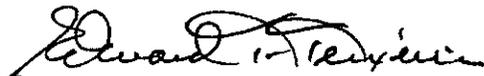
Mr. Melvin N. Kaku, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Dear Mr. Kaku:

Thank you for your letter of March 16, 2007, and the invitation to participate in the environmental review process for the Honolulu High-Capacity Transit Corridor Project. We completed a review of the Draft Coordination Plan for the Honolulu High-Capacity Transit Corridor Project and Comment dated March 16, 2007, and found it to be informative.

Our point of contact for participation in the Environmental Review Process for the High-Capacity Transit Corridor Project is Mr. Victor Gustafson, Plans and Operations Branch Chief, 733-4301, ext. 554. Thank you for the opportunity to assist you in this transportation planning initiative on Oahu.

Sincerely,

  
EDWARD T. TEIXEIRA  
Vice Director of Civil Defense

*JME* *Kaku*



TP 205038

PHONE (808) 733-4300  
FAX (808) 733-4287

37 APR 19 A10:25

RECEIVED

OFFICE OF THE DIRECTOR OF CIVIL DEFENSE  
TRANSPORTATION SERVICES

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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 18, 2008

RT8/08-274211

Major General Robert G. F. Lee  
Adjutant General and Director of  
Civil Defense  
State Department of Civil Defense  
3949 Diamond Head Road  
Honolulu, HI 96816-4495

Dear Sir:

Subject: Honolulu High-Capacity Transit Corridor Project  
Participating Agency Project Update

Thank you for agreeing to become involved in the environmental review process for the Honolulu High-Capacity Transit Corridor Project as a Participating Agency. Pursuant to stipulations in the National Environmental Policy Act (NEPA), Section 6002 of the *Safe, Accountable, Flexible, Efficient, Transportation Equity Act—A Legacy for Users* (SAFETEA-LU) guidance for federally funded projects, and Chapter 343 of the Hawaii Revised Statutes, and your participation as a Participating Agency with the Project, the City and County of Honolulu Department of Transportation Services (DTS) is providing internal and confidential intergovernmental copies of the Purpose and Need for the Project and Alternatives Chapters from the Draft Environmental Impact Statement for your review and comment.

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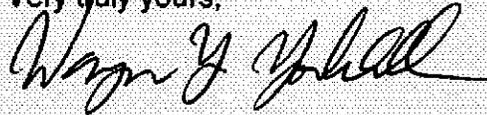
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Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Major General Robert G. F. Lee  
Page 2  
August 18, 2008

If you would like for project staff to provide an update, please contact Ms. Stephanie Roberts at (808) 768-6143 to schedule a meeting. We look forward to updating you about the project.

Very truly yours,



WAYNE Y. YOSHIOKA  
Director

Enclosure:  
1 CD containing the following:  
Purpose and Need for the Project  
Alternatives



TP 1/06 - 135826  
PATRICIA HAMAMOTO  
SUPERINTENDENT

STATE OF HAWAII  
DEPARTMENT OF EDUCATION  
P.O. BOX 2360  
HONOLULU, HAWAII 96804

OFFICE OF BUSINESS SERVICES

January 10, 2006

Mr. Alfred A. Tanaka, Acting Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

RECEIVED  
10 JAN 11 P 2:43  
DEPARTMENT OF EDUCATION  
OFFICE OF BUSINESS SERVICES

Dear Mr. Tanaka:

The Department of Education (DOE) has reviewed the Scoping Information Package and the State of Hawaii Environmental Impact Statement (EIS) Preparation Notice for the High-Capacity Transit Corridor Project.

The DOE notes that there was no reference in the document to the students or facilities of the DOE. We assume that students commuting to school would also be users of a new urban transportation system in Honolulu. We note that under social and economic conditions, the Draft EIS will evaluate direct and indirect impacts of the proposed system on parks and recreation areas; historic resources; and visual and aesthetic resources. We hope that you will consider adding educational resources.

The DOE would like to see that schoolchildren could use a new transit system safely, economically and efficiently. Since they are not likely users of park and ride facilities, our concern would center on how students could safely access the transit stops and then use the system.

The DOE would like to know where the system might be relying on school lands or future school lands and the levels of noise when routes are located close to school facilities.

If you have any questions, please call me at 586-0430 or Heidi Meeker of the Facilities Development Branch at 733-4862.

Sincerely,

Duane Kashiwai, Public Works Manager  
Facilities Development Branch

DK:ly

cc: Patricia Hamamoto, Superintendent  
Clayton Fujie, Deputy Superintendent  
Assistant Superintendent, OBS



STATE OF HAWAII  
DEPARTMENT OF EDUCATION  
P.O. BOX 2360  
HONOLULU, HAWAII 96804

1P202711  
PATRICIA HAMAMOTO  
SUPERINTENDENT

TORU  
MR

OFFICE OF BUSINESS SERVICES

March 30, 2007

Mr. Melvin N. Kaku, Director  
Department of Transportation  
City and County of Honolulu  
650 South King Street, Third Floor  
Honolulu, Hawaii 96813

Dear Mr. Kaku:

Subject: Invitation to Participate in Review Process for Transit Corridor Project

The Department of Education accepts your invitation to become a participating agency in the environmental review process for the Transit Project.

We appreciate this opportunity to participate. Should you have any questions, please call Heidi Meeker of the Facilities Development Branch at 733-4862.

Sincerely yours,

A handwritten signature in black ink that reads "Duane Y. Kashiwai".

Duane Y. Kashiwai  
Public Works Administrator

DYK:jmb

c: Superintendent  
Assistant Superintendent, OBS

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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 18, 2008

RT8/08-274197

Mr. Duane Kashiwai  
Public Works Administrator  
Department of Education  
State of Hawaii  
P. O. Box 2360  
Honolulu, Hawaii 96804

Dear Mr. Kashiwai:

**Subject: Honolulu High-Capacity Transit Corridor Project  
Participating Agency Project Update**

Thank you for agreeing to become involved in the environmental review process for the Honolulu High-Capacity Transit Corridor Project as a Participating Agency. Pursuant to stipulations in the National Environmental Policy Act (NEPA), Section 6002 of the *Safe, Accountable, Flexible, Efficient, Transportation Equity Act—A Legacy for Users* (SAFETEA-LU) guidance for federally funded projects, and Chapter 343 of the Hawaii Revised Statutes, and your participation as a Participating Agency with the Project, the City and County of Honolulu Department of Transportation Services (DTS) is providing internal and confidential intergovernmental copies of the Purpose and Need for the Project and Alternatives Chapters from the Draft Environmental Impact Statement for your review and comment.

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Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Mr. Duane Kashiwai  
Page 2  
August 18, 2008

If you would like for project staff to provide an update, please contact Ms. Stephanie Roberts at (808) 768-6143 to schedule a meeting. We look forward to updating you about the project.

Very truly yours,



WAYNE Y. YOSHIOKA  
Director

Enclosure:  
1 CD containing the following:  
Purpose and Need for the Project  
Alternatives

7p 1/06-134350

LINDA LINGLE  
GOVERNOR  
STATE OF HAWAII



MICAH A. KANE  
CHAIRMAN  
HAWAIIAN HOMES COMMISSION

BEN HENDERSON  
DEPUTY TO THE CHAIRMAN

KAULANA H. PARK  
EXECUTIVE ASSISTANT

STATE OF HAWAII  
DEPARTMENT OF HAWAIIAN HOME LANDS

P.O. BOX 1879  
HONOLULU, HAWAII 96805

December 29, 2005

Mr. Toru Hamayasu  
Transportation Planning Division  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

JAN 3 9 26 AM '06

TRANS PLANNING

Dear Mr. Hamayasu:

Subject: Honolulu High-Capacity Transit Corridor Project  
East Kapolei Region  
Preferred Route

Please allow this letter to express the Department of Hawaiian Home Land's (DHHL) preferred route for the high-capacity transit corridor. As a major developer in the East Kapolei region, the DHHL would prefer that the transit corridor follow the route as shown on the attached exhibit. Essentially, this would be similar to your department's Alternative 4d as it pertains to the East Kapolei area. The DHHL fully supports the University of Hawaii West Oahu campus and this route would allow the high capacity transit system to access the West Oahu Campus at its main entrance and focal point.

This route would also serve a major commercial center planned by the DHHL at the intersection of the North-South Road and the Kapolei Parkway. Because the DHHL is of the opinion that education is the key to success for its beneficiaries, it would like to see the University of Hawaii West Oahu campus, the Leeward Oahu Community College and the University of Hawaii Manoa campus connected by the high-capacity transit system. As far as the balance of the route is concerned, the DHHL withholds its comments in favor of those along the proposed routes.

Mr. Toru Hamayasu  
December 29, 2005  
Page 2

If you have any questions or require more information, please  
call me at 586-3801 or Larry Sumida at 630-7141.

Aloha and mahalo,

A handwritten signature in black ink that reads "MICK". The letters are bold and stylized, with a thick horizontal stroke at the end of the "K".

Micah A. Kane, Chairman  
Hawaiian Homes Commission

Encl.

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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 18, 2008

RT8/08-274185

Honorable Micah Kane, Chairman  
Department of Hawaiian Home Lands  
State of Hawaii  
P. O. Box 1879  
Honolulu, Hawaii 96805

Dear Mr. Kane:

Subject: Honolulu High-Capacity Transit Corridor Project  
Participating Agency Project Update

Thank you for agreeing to become involved in the environmental review process for the Honolulu High-Capacity Transit Corridor Project as a Participating Agency. Pursuant to stipulations in the National Environmental Policy Act (NEPA), Section 6002 of the *Safe, Accountable, Flexible, Efficient, Transportation Equity Act—A Legacy for Users* (SAFETEA-LU) guidance for federally funded projects, and Chapter 343 of the Hawaii Revised Statutes, and your participation as a Participating Agency with the Project, the City and County of Honolulu Department of Transportation Services (DTS) is providing internal and confidential intergovernmental copies of the Purpose and Need for the Project and Alternatives Chapters from the Draft Environmental Impact Statement for your review and comment.

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Any formal written comments are requested by September 17, 2008, and should be addressed to:

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Mr. Micah Kane  
Page 2  
August 18, 2008

If you would like for project staff to provide an update, please contact Ms. Stephanie Roberts at (808) 768-6143 to schedule a meeting. We look forward to updating you about the project.

Very truly yours,



WAYNE Y. YOSHIOKA  
Director

Enclosure:  
1 CD containing the following:  
Purpose and Need for the Project  
Alternatives

March 16, 2007

Dr. Chiyome Fukino  
Hawaii Department of Health  
P.O. Box 3378  
Honolulu, HI 96801

Re: Invitation to Participate in the Environmental Review Process for the Honolulu High-Capacity Transit Corridor Project

Dr. Fukino:

The Federal Transit Administration (FTA), in cooperation with the City and County of Honolulu, Department of Transportation Services (DTS) is initiating the preparation on a proposal by the City and County of Honolulu to implement a fixed-guideway transit system in the corridor between Kapolei and the University of Hawai'i at Mānoa with a branch to Waikīkī. Alternatives proposed to be considered in the draft EIS include No Build and two Fixed Guideway Transit alternatives. The purpose of the project, as currently defined, is to provide high-capacity, high-speed transit in the highly congested east-west transportation corridor between Kapolei and the University of Hawai'i at Mānoa, as specified in the 2030 O'ahu Regional Transportation Plan (ORTP). The enclosed scoping information packet provides more details. A preliminary coordination plan including a schedule also is enclosed.

Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users establishes an enhanced environmental review process for certain FTA projects, increasing the transparency of the process, as well as opportunities for participation. The requirements of Section 6002 apply to the project that is the subject of this letter. As part of the environmental review process for this project, the lead agencies must identify, as early as practicable, any other Federal and non-Federal agencies that may have an interest in the project, and invite such agencies to become participating agencies in the environmental review process.<sup>1</sup> Your agency has been identified preliminarily as one that may have an interest in this project; accordingly, you are being extended this invitation to become actively involved as a participating agency in the environmental review process for the project.

As a participating agency, you will be afforded the opportunity, together with the public, to be involved in defining the purpose of and need for the project, as well as in determining the range of alternatives to be considered for the project. In addition, you will be asked to:

---

<sup>1</sup> Designation as a "participating agency" does not imply that the participating agency supports the proposed project or has any jurisdiction over, or special expertise concerning the proposed project or its potential impacts. A "participating agency" differs from a "cooperating agency," which is defined in regulations implementing the National Environmental Policy Act as "any Federal agency other than a lead agency which has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (or a reasonable alternative) for legislation or other major Federal action significantly affecting the quality of the human environment." [40 C.F.R. § 1508.5](#).

- Provide input on the impact assessment methodologies and level of detail in your agency's area of expertise;
- Participate in coordination meetings, conference calls, and joint field reviews, as appropriate; and
- Review and comment on sections of the pre-draft or pre-final environmental documents to communicate any concerns of your agency on the adequacy of the document, the alternatives considered, and the anticipated impacts and mitigation.

If you elect to become a participating agency, you must accept this invitation in writing. The acceptance may be transmitted electronically to [fmiyamoto@honolulu.gov](mailto:fmiyamoto@honolulu.gov); please include the title of the official responding. In order to give your agency adequate opportunity to weigh the relevance of your participation in this environmental review process, written responses to this invitation are not due until after the interagency scoping meeting, scheduled for March 28, 2007 from 10:00 a.m. to 12:00 p.m. at Honolulu Hale, Mission Memorial Auditorium at 558 South King Street, Honolulu, HI 96813. You or your delegate is invited to represent your agency at this meeting. Written responses accepting designation as participating agencies should be transmitted to this office not later than April 20, 2007.

Additional information will be forthcoming during the scoping process. If you have questions regarding this invitation, please contact Mr. Toru Hamayasu of DTS at (808) 768-8344.

Sincerely,

Melvin Kaku, Director  
Department of Transportation Services

Enclosures:  
Scoping Information Package

TP 1/06 - 136056

LINDA LINGLE  
GOVERNOR OF HAWAII



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

January 10, 2006

PETER T. YOUNG  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT  
  
ROBERT K. MASUDA  
DEPUTY DIRECTOR  
  
DEAN NAKANO  
ACTING DEPUTY DIRECTOR - WATER  
  
AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
BUREAU OF CONVEYANCES  
COMMISSION ON WATER RESOURCE MANAGEMENT  
CONSERVATION AND COASTAL LANDS  
CONSERVATION AND RESOURCES ENFORCEMENT  
ENGINEERING  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
KAOHOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

C&COHTRANSPORTATION

Alfred A. Tanaka, P.E.  
Acting Administrator  
Department of Transportation Services  
City and County Of Honolulu  
650 South King Street  
Honolulu, Hawaii 96813

Dear Mr. Tanaka:

Subject: Honolulu High Capacity Transit Corridor Project

Thank you for the opportunity to review and comment on the subject matter.

A copy of the document pertaining to the subject project was transmitted or made available to the following Department of Land and Natural Resources' Divisions for their review and comment:

- Division of Aquatic Resources
- Engineering Division
- Division of Forestry and Wildlife
- Commission on Water Resource Management
- Office of Conservation and Coastal Lands
- Land-Oahu District Land Office
- Special Project Coordinator Oahu Branch

Enclosed please find a copy of the Division of Aquatic Resources, Commission on Water Resource Management and Oahu District Land Office response.

Based on the attached responses, the Department of Land and Natural Resources has no other comment to offer on the subject matter.

Should you have any questions, please contact Nicholas A. Vaccaro of the Land Division Support Services Branch at 587-0384.

Very truly yours,

RUSSELL Y. TSUJI  
Administrator

C: ODLO

LD-NAV  
RECEIVED  
JAN 12 2006



Suspense Date: December 28, 2005

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
Division of Aquatic Resources  
Honolulu, Hawaii

MEMORANDUM

To: Dan Polhemus, Administrator *DP*  
From: Richard Sixberry, Aquatic Biologist  
Subject: Comments on Draft Environmental Impact Statement Preparation Notice

Comments Requested By: Russell Y. Tsuji, Land Division

Date of Request: 12/13/05 Date Received: 12/21/05

Summary of Project

Title: Honolulu High-Capacity Transit Corridor Project

Proj. By: C&C, Department of Transportation Services

Location: Various, Oahu

Brief Description:

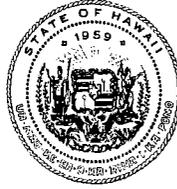
The City & County of Honolulu Department of Transportation Services will be preparing an EIS to evaluate alternatives that would provide high-capacity transit service on Oahu. The primary study area is the travel corridor between Kapolei and the University of Hawaii at Manoa.

Comments:

We will review the DEIS when it is completed and comment on any significant impacts adverse to aquatic resource values at a later date. Specific impacts from some of the projects described cannot be identified at this time.

Many previous transportation proposals have been reviewed by our Division and comments have been provided. We do not expect any significant adverse effects on the aquatic environment from the future activities anticipated. However, when additional information about the projects becomes available, we would appreciate further opportunity to address any potential aquatic resources concerns.

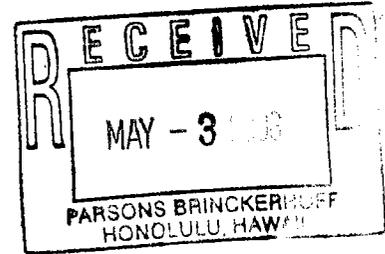
LINDA LINGLE  
GOVERNOR OF HAWAII



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
DIVISION OF AQUATIC RESOURCES  
1151 PUNCHBOWL STREET  
HONOLULU, HAWAII 96813

May 1, 2006

Nami Ohtomo, Environmental Planner  
Parsons, Brinckerhoff, Quade, and Douglas, Inc.  
American Savings Bank Tower  
1001 Bishop Street, Suite 2400  
Honolulu, HI 96813



PETER T. YOUNG  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT

ROBERT K. MASUDA  
DEPUTY DIRECTOR - LAND

DEAN NAKANO  
ACTING DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
BUREAU OF CONVEYANCES  
COMMISSION ON WATER RESOURCE MANAGEMENT  
CONSERVATION AND COASTAL LANDS  
CONSERVATION AND RESOURCES ENFORCEMENT  
ENGINEERING  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
KAHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

Dear Ms. Nami,

The only species that Division of Aquatic Resources have any concerns about that are listed in Hawaii Revised Statutes Chapter 195D are whales, marine turtles and monk seals.

Although the City & County Study Area Maps describes briefly the proposed project, we suggest the forthcoming DEIS discuss in detail potential short term impacts and propose specific means for averting or minimizing adverse effects, and provide possible mitigation for unavoidable damage to natural resource values such as Best Management Practices and Water Quality Monitoring.

All proposed stream, shoreline and seaward activities in the vicinity should be adequately described in the DEIS and the Department should have the opportunity to review all project related effects to the aquatic environment. Crossings of drainageways or perennial freshwater streams necessary for the project should be adequately described in the DEIS

Specific impacts from some of the projects described cannot be identified at this time. Many previous transportation proposals have been reviewed by our Division and comments have been provided. We do not expect any significant adverse effects on the aquatic environment from the future activities anticipated. However, when additional information about the projects becomes available, we would appreciate further opportunity to address any potential aquatic resources concerns. We will review the DEIS when it is completed and comment on any significant impacts adverse to aquatic resource values at a later date.

Sincerely,

*for* Dan Polhemus, Administrator  
Division of Aquatic Resources

LINDA LINGLE  
GOVERNOR OF HAWAII



05 DEC 20 P3:53

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

PETER T. YOUNG  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT  
ROBERT K. MASUDA  
DEPUTY DIRECTOR  
DEAN HAKARD  
ACTING DEPUTY DIRECTOR - WATER  
AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
BUREAU OF CONVEYANCES  
COMMISSION ON WATER RESOURCE MANAGEMENT  
CONSERVATION AND COASTAL LANDS  
CONSERVATION AND RESOURCES ENFORCEMENT  
ENGINEERING  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
KAOLOAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

December 13, 2005  
C&COHTRANSIT

LD-NAV  
Suspense Date: 12/28/05

MEMORANDUM:

TO: XXX Division of Aquatic Resources  
XXX Office of Conservation and Coastal Lands  
XXX Engineering Division  
✓ XXX Commission on Water Resource Management  
XXX Oahu District Land Office  
XXX Division of Aquatic Resources  
XXX Special Projects Coordinator (ODLO)  
XXX Division of Forestry and Wildlife

FROM: Russell Y. Tsuji, Administrator  
Land Division

SUBJECT: Document Review (Draft)  
Environmental Impact Statement Preparation Notice  
Titled: Honolulu High Capacity Transit Corridor

Please review the attached document pertaining to the subject matter and submit your comments (if any) back to us on Division letterhead signed and dated by the suspense date.

If you have any questions, please contact Nicholas A. Vaccaro at 587-0384. If this office does not receive your comments by the suspense date, we will assume there are no comments.

( ) We have no comments.

✓ Comments attached.

Signed: Edwin T. Saboda

Date: DEC 23 2005

Name: Edwin T. Saboda

Division: CWRM



PETER T. YOUNG  
CHAIRPERSON  
MEREDITH J. CHING  
JAMES A. FRAZIER  
NEAL S. FUJWARA  
CHIYOME L. FUKINO, M.D.  
LAWRENCE H. MIKKE, M.D., J.D.  
STEPHANIE A. WHALEN

DEAN A. NAKANO  
ACTING DEPUTY DIRECTOR

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT

P.O. BOX 621  
HONOLULU, HAWAII 96809  
DEC 23 2005

REF:

TO: Russell Tsuji, Administrator  
Land Division

FROM: Dean A. Nakano, Acting Deputy Director *DAN*  
Commission on Water Resource Management

SUBJECT: EISPN Honolulu High Capacity Transit Corridor

FILE NO.: C&CHTRANSIT

RECEIVED  
LAND DIVISION  
2005 DEC 23 P 2  
DEPT. OF LAND  
NATURAL RESOURCES  
STATE OF HAWAII

Thank you for the opportunity to review the subject document. The Commission on Water Resource Management (CWRM) is the agency responsible for administering the State Water Code (Code). Under the Code, all waters of the State are held in trust for the benefit of the citizens of the State, therefore, all water use is subject to legally protected water rights. CWRM strongly promotes the efficient use of Hawaii's water resources through conservation measures and appropriate resource management. For more information, please refer to the State Water Code, Chapter 174C, Hawaii Revised Statutes, and Hawaii Administrative Rules, Chapters 13-167 to 13-171. These documents are available via the Internet at <http://www.hawaii.gov/dlnr/cwrm>.

Our comments related to water resources are checked off below.

- 1. We recommend coordination with the county to incorporate this project into the county's Water Use and Development Plan. Please contact the respective Planning Department and/or Department of Water Supply for further information.
- 2. We recommend coordination with the Engineering Division of the State Department of Land and Natural Resources to incorporate this project into the State Water Projects Plan.
- 3. There may be the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality.

Permits required by CWRM: Additional information and forms are available at [www.hawaii.gov/dlnr/cwrm/forms.htm](http://www.hawaii.gov/dlnr/cwrm/forms.htm).

- 4. The proposed water supply source for the project is located in a designated ground-water management area, and a Water Use Permit is required prior to use of ground water.
- 5. A Well Construction Permit(s) is (are) required before the commencement of any well construction work.
- 6. A Pump Installation Permit(s) is (are) required before ground water is developed as a source of supply for the project.
- 7. There is (are) well(s) located on or adjacent to this project. If wells are not planned to be used and will be affected by any new construction, they must be properly abandoned and sealed. A permit for well abandonment must be obtained.

DRF-LD 04/15/2005

- 8. Ground-water withdrawals from this project may affect streamflows, which may require an instream flow standard amendment.
- 9. A Stream Channel Alteration Permit(s) is (are) required before any alteration can be made to the bed and/or banks of a stream channel.
- 10. A Stream Diversion Works Permit(s) is (are) required before any stream diversion works is constructed or altered.
- 11. A Petition to Amend the Interim Instream Flow Standard is required for any new or expanded diversion(s) of surface water.
- 12. The planned source of water for this project has not been identified in this report. Therefore, we cannot determine what permits or petitions are required from our office, or whether there are potential impacts to water resources.
- 13. We recommend that the report identify feasible alternative non-potable water resources, including reclaimed wastewater.

OTHER:

The Draft EIS should address whether bed or banks of streams would be affected by this project.

This project may require other agency approvals regarding wetlands, water quality, grading, stockpiling and floodways.

If there are any questions, please contact David Higa at 587-0249.

LINDA LINGLE  
GOVERNOR OF HAWAII



RECEIVED  
LAND DIVISION

2005 DEC 30 A 7:51



DEPT. OF LAND &  
NATURAL RESOURCES  
STATE OF HAWAII

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

PETER T. YOUNG  
CHAIRMAN  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT

ROBERT M. MASUDA  
DEPUTY DIRECTOR

DEAN NAKANO  
ACTING DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
BUREAU OF CONVEYANCE  
COMMISSION ON WATER RESOURCE MANAGEMENT  
CONSERVATION AND COASTAL LANDS  
CONSERVATION AND RESOURCES ENFORCEMENT

ENGINEERING  
FORESTRY AND WILDLIFE  
NATURAL RESERVATION  
KAHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

December 13, 2005  
C&CONTRANSIT

LD-NAV  
Suspense Date: 12/28/05

MEMORANDUM:

TO: XXX Division of Aquatic Resources  
XXX Office of Conservation and Coastal Lands  
XXX Engineering Division  
XXX Commission on Water Resource Management  
✓ XXX Oahu District Land Office  
XXX Division of Aquatic Resources  
XXX Special Projects Coordinator (ODLO)  
XXX Division of Forestry and Wildlife

FROM: Russell Y. Tsuji, Administrator  
Land Division *[Signature]*

SUBJECT: Document Review (Draft)  
Environmental Impact Statement Preparation Notice  
Titled: Honolulu High Capacity Transit Corridor

Please review the attached document pertaining to the subject matter and submit your comments (if any) back to us on Division letterhead signed and dated by the suspense date.

If you have any questions, please contact Nicholas A. Vaccaro at 587-0384. If this office does not receive your comments by the suspense date, we will assume there are no comments.

We have no comments

Comments attached.

Signed: *Cecil Santos*

Date: 12/28/05

Name: Cecil Santos

Division: LAND - OAHU DISTRICT

01

TP-205771 62989

LINDA LINGLE  
GOVERNOR OF HAWAII



**STATE OF HAWAII**  
**DEPARTMENT OF LAND AND NATURAL RESOURCES**

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

April 18, 2007

**PETER T. YOUNG**  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT

**ROBERT K. MASUDA**  
DEPUTY DIRECTOR

AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
BUREAU OF CONVEYANCES  
COMMISSION ON WATER RESOURCE MANAGEMENT  
CONSERVATION AND COASTAL LANDS  
CONSERVATION AND RESOURCES ENFORCEMENT  
ENGINEERING  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
KAHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

RECEIVED  
77 APR 20 P 2: 46

Mr. Melvin N. Kaku, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Dear Mr. Kaku:

**Subject: Invitation to Participate in the Environmental Review Process for the Honolulu High-Capacity Transit Corridor Project.**

The Department of Land and Natural Resources, Historic Preservation Division and Division of Forestry and Wildlife will provide comments as the environmental review process information for historic sites and endangered species become available along this important transit corridor on Oahu. Other line Divisions of the Department may participate as appropriate following the review of the environmental document. Federal and State laws help protect historic sites and plant species in the State of Hawaii and we will determine the level and appropriateness of our participation based on the documents and surveys that will be included in the environmental impact statement preparation. Thank you for the opportunity to participate in this environmental review.

Sincerely yours,

Peter T. Young  
Chairperson

C: Division of Forestry and Wildlife  
Historic Preservation

LINDA LINGLE  
GOVERNOR OF HAWAII



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
DIVISION OF FORESTRY AND WILDLIFE  
1151 PUNCHBOWL STREET  
HONOLULU, HAWAII 96813

April 2, 2008

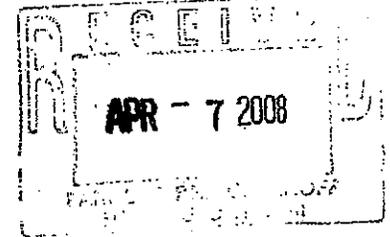
Laura H. Thielen  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES

Russell Y. Tsujii  
FIRST DEPUTY

KEN C. KAWAHARA  
DEPUTY DIRECTOR FOR  
THE COMMISSION ON  
WATER RESOURCE MANAGEMENT

AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
COMMISSION ON WATER RESOURCE  
MANAGEMENT  
CONSERVATION AND COASTAL LANDS  
CONSERVATION AND  
RESOURCES ENFORCEMENT  
CONVEYANCES  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
KAHOOLAWE ISLAND RESERVE  
COMMISSION  
LAND MANAGEMENT  
STATE PARKS

Mr. Darrell Sommerlatt  
Environmental Scientist  
Parsons Brinckerhoff, Inc  
American Saving Bank Tower  
1001 Bishop Street, Suite 2400  
Honolulu, Hawaii 96813



Dear Mr. Sommerlatt:

Subject: Request for Species List, Endangered Species Act, Honolulu High-Capacity Transit Corridor Project, Island of Oahu.

We appreciate the opportunity to comment on your subject request. DLNR, Division of Forestry and Wildlife know of three endangered plants that have historical significance in the Kapolei-Ewa plains area. Federal and state laws protect these plants and the identified genus-species are 1) *Chamaesyce skottsbergii* var. *skottsbergii* common name akoko, 2) *Achyranthes splendens* var. *rotundata* and 3) *Abutilon menziesii*. Please have a trained Botanist who is familiar with identifying these plants, survey your proposed transit corridor route to mitigate the potential impacts that this project may have on the endangered plants. ~~This information should be contained in your draft EIS under flora and fauna survey.~~ Thank you for the opportunity to comment your project.

Sincerely yours,

Paul J. Conry  
Administrator

279/08-279350

LINDA LINGLE  
GOVERNOR OF HAWAII



LAURA H. THIELEN  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

September 15, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City & County of Honolulu  
650 South King Street 3rd Floor  
Honolulu, Hawaii 96813

Attention: Ms. Stephanie Roberts

Gentlemen:

Subject: Honolulu High-Capacity Transit Corridor Project Participating Agency  
Project Update

Thank you for the opportunity to review and comment on the subject matter. The Department of Land and Natural Resources' (DLNR), Land Division distributed or made available a copy of your report pertaining to the subject matter to DLNR Divisions for their review and comment.

Other than the comments from Division of Boating & Ocean Recreation, Division of State Parks, Commission on Water Resource Management, Engineering Division, Land Division, the Department of Land and Natural Resources has no other comments to offer on the subject matter. Should you have any questions, please feel free to call our office at 587-0433. Thank you.

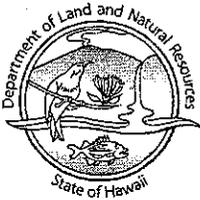
Sincerely,

Morris M. Atta  
Administrator

DIRECTOR'S OFFICE  
DEPT. OF  
TRANSPORTATION SERVICES

08 SEP 16 10:58

RECEIVED



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

August 26, 2008

MEMORANDUM

TO: **DLNR Agencies:**  
 Div. of Aquatic Resources  
 Div. of Boating & Ocean Recreation  
 Engineering Division  
 Div. of Forestry & Wildlife  
 Div. of State Parks  
 Commission on Water Resource Management  
 Office of Conservation & Coastal Lands  
 Land Division – Oahu District/Keith/Gavin

FROM: Morris M. Atta *M. Atta*  
SUBJECT: Honolulu High-Capacity Transit Corridor Project  
LOCATION: Island of Oahu  
APPLICANT: City & County of Honolulu

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by September 14, 2008.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact my office at 587-0433. Thank you.

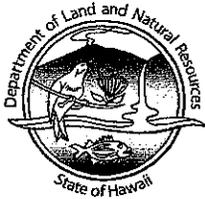
Attachments

- We have no objections.  
 We have no comments.  
 Comments are attached.

Signed: *[Signature]*  
Date: *8/26/08*

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LINDA LINGLE  
GOVERNOR OF HAWAII



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

September 8, 2008

MEMORANDUM

To: Morris M. Atta  
Land Division

From: Daniel S. Quinn *[Signature]*  
*for* Division of State Parks

Subject: Honolulu High-Capacity Transit Corridor Project

By letter dated February 1, 2008, Wayne Yoshioka, Director of the Department of Transportation Services, City and County of Honolulu, we were informed that the proposed high-capacity transit service would potentially impact seven (7) park areas, one of which is 'Aiea Bay State Recreation Area (SRA), the only 6(f) protected park of the 7 park areas. 6(f) protection applies to areas acquired and/or developed using funds from the federal Land and Water Conservation Fund Program administered by the National Park Service. To comply with NEPA, the potential impacts of this corridor project to the existing pedestrian/biking path and to the wetland wildlife, among others, must be evaluated and considered in your planning. While it is unclear if there will be any taking of land from this park for the travel corridor, please be aware that any taking will be subject to NPS concurrence and a conversion. In a conversion, the park land must be replaced with new park land of equivalent recreational value and appraised value.

While the February 1, 2008 letter indicated that State Parks would be briefed on the project, no meeting has been scheduled to date to discuss this matter. We are available to further discuss the project particularly with respect to the potential impacts to 'Aiea Bay SRA relative to both 4(f) and 6(f).

We appreciate the opportunity to review and comment on the proposed project. Should you have questions, please feel free to contact Lauren Tanaka at 587-0293 or by email to: [Lauren.A.Tanaka@hawaii.gov](mailto:Lauren.A.Tanaka@hawaii.gov).

LAURA H. THIELEN  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT

RUSSELL V. TSUJI  
FIRST DEPUTY

KEN C. KAWAHARA  
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
BUREAU OF CONVEYANCES  
COMMISSION ON WATER RESOURCE MANAGEMENT  
CONSERVATION AND COASTAL LANDS  
CONSERVATION AND RESOURCES ENFORCEMENT  
ENGINEERING  
FORESTRY AND WILDLIFE  
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DEPT OF LAND &  
NATURAL RESOURCES  
STATE OF HAWAII

LINDA LINGLE  
GOVERNOR OF HAWAII



LAURA H. THIELEN  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT  
RECEIVED



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

08 AUG 27 08:23

COMMISSION ON WATER  
RESOURCE MANAGEMENT

August 26, 2008

MEMORANDUM

From: TO:

**DLNR Agencies:**

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division
- Div. of Forestry & Wildlife
- Div. of State Parks
- Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division – Oahu District/Keith/Gavin

0:

FROM: Morris M. Atta *M. Atta*  
 SUBJECT: Honolulu High-Capacity Transit Corridor Project  
 LOCATION: Island of Oahu  
 APPLICANT: City & County of Honolulu

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by September 14, 2008.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact my office at 587-0433. Thank you.

Attachments

- ( ) We have no objections.
- ( ) We have no comments.
- ( X ) Comments are attached.

Signed: *KWC Kawa*  
Date: 09/04/08



RECEIVED  
LAND DIVISION

2008 SEP -4 P 2:31

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT  
P.O. BOX 621  
HONOLULU, HAWAII 96809

September 4, 2008

LAURA H. THIELEN  
CHAIRPERSON  
MEREDITH J. CHING  
JAMES A. FRAZIER  
NEAL S. FUJIIWARA  
CHIYOME L. FUKINO, M.D.  
DONNA FAY K. KIYOSAKI, P.E.  
LAWRENCE H. MIKE, M.D., J.D.

KEN C. KAWAHARA, P.E.  
DEPUTY DIRECTOR

REF: Honolulu High-Capacity Transit Corridor

TO: Morris Atta, Administrator  
Land Division

FROM: Ken C. Kawahara, P.E., Deputy Director  
Commission on Water Resource Management

SUBJECT: Honolulu High-Capacity Transit Corridor Project

FILE NO.: NA  
TMK NO.: NA

Thank you for the opportunity to review the subject document. The Commission on Water Resource Management (CWRM) is the agency responsible for administering the State Water Code (Code). Under the Code, all waters of the State are held in trust for the benefit of the citizens of the State, therefore, all water use is subject to legally protected water rights. CWRM strongly promotes the efficient use of Hawaii's water resources through conservation measures and appropriate resource management. For more information, please refer to the State Water Code, Chapter 174C, Hawaii Revised Statutes, and Hawaii Administrative Rules, Chapters 13-167 to 13-171. These documents are available via the Internet at <http://www.hawaii.gov/dlnr/cwrn>.

Our comments related to water resources are checked off below.

- 1. We recommend coordination with the county to incorporate this project into the county's Water Use and Development Plan. Please contact the respective Planning Department and/or Department of Water Supply for further information.
- 2. We recommend coordination with the Engineering Division of the State Department of Land and Natural Resources to incorporate this project into the State Water Projects Plan.
- 3. We recommend coordination with the Hawaii Department of Agriculture (HDOA) to incorporate the reclassification of agricultural zoned land and the redistribution of agricultural resources into the State's Agricultural Water Use and Development Plan (AWUDP). Please contact the HDOA for more information.
- 4. We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development to reduce the increased demand on the area's freshwater resources. Reducing the water usage of a home or building may earn credit towards Leadership in Energy and Environmental Design (LEED) certification. More information on LEED certification is available at <http://www.usgbc.org/leed>. A listing of fixtures certified by the EPA as having high water efficiency can be found at <http://www.epa.gov/watersense/pp/index.htm>.
- 5. We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMPs may earn credit toward LEED certification. More information on stormwater BMPs can be found at <http://hawaii.gov/dbedt/czm/initiative/lid.php>.

- 6. We recommend the use of alternative water sources, wherever practicable.
- 7. There may be the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality.

Permits required by CWRM:

Additional information and forms are available at [http://hawaii.gov/dlnr/cwrp/resources\\_permits.htm](http://hawaii.gov/dlnr/cwrp/resources_permits.htm).

- 8. The proposed water supply source for the project is located in a designated water management area, and a Water Use Permit is required prior to use of water.
- 9. A Well Construction Permit(s) is (are) required any well construction work begins.
- 10. A Pump Installation Permit(s) is (are) required before ground water is developed as a source of supply for the project.
- 11. There is (are) well(s) located on or adjacent to this project. If wells are not planned to be used and will be affected by any new construction, they must be properly abandoned and sealed. A permit for well abandonment must be obtained.
- 12. Ground water withdrawals from this project may affect streamflows, which may require an instream flow standard amendment.
- 13. A Stream Channel Alteration Permit(s) is (are) required before any alteration(s) can be made to the bed and/or banks of a stream channel.
- 14. A Stream Diversion Works Permit(s) is (are) required before any stream diversion works is (are) constructed or altered.
- 15. A Petition to Amend the Interim Instream Flow Standard is required for any new or expanded diversion(s) of surface water.
- 16. The planned source of water for this project has not been identified in this report. Therefore, we cannot determine what permits or petitions are required from our office, or whether there are potential impacts to water resources.
- OTHER:

If there are any questions, please contact Lenore Ohye at 587-0216.

LO:sd



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

August 26, 2008

MEMORANDUM

TO: **DLNR Agencies:**  
 Div. of Aquatic Resources  
 Div. of Boating & Ocean Recreation  
 Engineering Division  
 Div. of Forestry & Wildlife  
 Div. of State Parks  
 Commission on Water Resource Management  
 Office of Conservation & Coastal Lands  
 Land Division - Oahu District/Keith/Gavin

FROM: Morris M. Atta *M. Atta*  
SUBJECT: Honolulu High-Capacity Transit Corridor Project  
LOCATION: Island of Oahu  
APPLICANT: City & County of Honolulu

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by September 14, 2008.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact my office at 587-0433. Thank you.

Attachments

- We have no objections.  
 We have no comments.  
 Comments are attached.

Signed: *KL*  
Date: 9/4/08



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

MEMORANDUM

To: Morris M. Atta, Administrator

From: Keith Chun, Planning and Development Manager 

Date: September 4, 2008

Re: Honolulu High-Capacity Transit Corridor Project, Oahu, Hawaii

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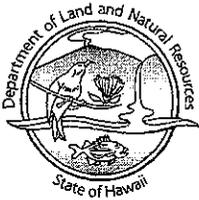
The following is in response to your request for comments dated August 26, 2008 regarding the City and County of Honolulu's High-Capacity Transit Corridor Project (the "Project").

The State of Hawaii Department of Land and Natural Resources ("DLNR") is the owner of two parcels of land in East Kapolei identified by Tax Map Key Numbers (1) 9-1-17:86 and (1) 9-1-18:05 (the "DLNR Lands"). According to Figures 2-5 and 2-15, one of the Project alternatives provides for a Fixed Guideway Alignment and a five-acre Park and Ride and Transit Center to be located within the DLNR Lands.

DLNR and the University of Hawaii – West O'ahu ("UHWO") have been negotiating an arrangement under which UHWO would develop the DLNR Lands in connection with the UHWO campus. While no formal agreement has yet been entered, DLNR and UHWO continue to work together on this arrangement.

Thank you for the opportunity to provide these comments.

cc: Mr. Gene Awakuni, Chancellor  
University of Hawaii – West Oahu



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

August 26, 2008

MEMORANDUM

*FROM:*  
*TO:*

**DLNR Agencies:**

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division
- Div. of Forestry & Wildlife
- Div. of State Parks
- Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division – Oahu District/Keith/Gavin

*TO:* ~~FROM:~~

Morris M. Atta *Thielen*

SUBJECT: Honolulu High-Capacity Transit Corridor Project

LOCATION: Island of Oahu

APPLICANT: City & County of Honolulu

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by September 14, 2008.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact my office at 587-0433. Thank you.

Attachments

- We have no objections.
- We have no comments. \*LD Development Team will
- Comments are attached. provide comments.

Signed: *Thielen*

Date: 8/27/08 *BL*

# Division of Forestry & Wildlife

1151 Punchbowl Street, Rm. 325 • Honolulu, HI 96813 • (808) 587-0166 • Fax: (808) 587-0160

September 15, 2008

## MEMORANDUM

TO: Morris M. Atta, Administrator  
Land Division

FROM: Paul J. Conry, Administrator  
Division of Forestry and Wildlife



SUBJECT: Request for Comments: Honolulu High-Capacity Transit Corridor Project.

DOFAW has reviewed the subject project request for comments and provide the following for your consideration. Page S-1 – *Abutilon* is mentioned as “threatened,” but it is actually listed as “endangered” according to State and Federal law. The Habitat Conservation Plan (HCP) covers only the land included in the document, not within the surrounding land area. If additional plants are discovered outside the boundaries of the lands covered, then the transit corridor will need its own Habitat Conservation Plan. Finally, should a plant survey of the transit corridor show no endangered plants in the Kapolei-Ewa area, it does not mean no plants are present because plants have emerged following rainfall or scarification. Thank you for the opportunity to comment on this project.

DEPT. OF LAND &  
NATURAL RESOURCES  
STATE OF HAWAII

2008 SEP 17 P 1:39

RECEIVED  
LAND DIVISION

RT 9/08-280327

LINDA LINGLE  
GOVERNOR OF HAWAII



LAURA H. THIELEN  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

September 22, 2008

08 SEP 24 08:57

DTS  
RAPID TRANSIT

City & County of Honolulu  
Department of Transportation Services  
650 South King Street 3rd Floor  
Honolulu, Hawaii 96813

Attention: Ms. Stephanie Roberts

Gentlemen:

Subject: Honolulu High-Capacity Transit Corridor Project Participating Agency project Update

Thank you for the opportunity to review and comment on the subject matter. The Department of Land and Natural Resources' (DLNR), Land Division distributed or made available a copy of your report pertaining to the subject matter to the Division of Forestry & Wildlife for their review and comment.

The Department of Land and Natural Resources has no other comments to offer on the subject matter. Should you have any questions, please feel free to call our office at 587-0433. Thank you.

Sincerely,

Morris M. Atta  
Administrator

Cc: Office of Planning

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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 788-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 18, 2008

RT8/08-274147

Honorable Laura Thielen, Chairperson  
Department of Land and Natural Resources  
State of Hawaii  
P. O. Box 621  
Honolulu, Hawaii 96809

Dear Ms. Thielen:

**Subject: Honolulu High-Capacity Transit Corridor Project  
Participating Agency Project Update**

Thank you for agreeing to become involved in the environmental review process for the Honolulu High-Capacity Transit Corridor Project as a Participating Agency. Pursuant to stipulations in the National Environmental Policy Act (NEPA), Section 6002 of the *Safe, Accountable, Flexible, Efficient, Transportation Equity Act—A Legacy for Users* (SAFETEA-LU) guidance for federally funded projects, and Chapter 343 of the Hawaii Revised Statutes, and your participation as a Participating Agency with the Project, the City and County of Honolulu Department of Transportation Services (DTS) is providing internal and confidential intergovernmental copies of the Purpose and Need for the Project and Alternatives Chapters from the Draft Environmental Impact Statement and also pertinent Technical Reports for your review and comment. These Technical Reports include those regarding Natural Resources, Water Resources, and Ecosystems. The Technical Reports regarding Historic Resources, Archaeological Resources, and Cultural Resources were sent directly to the State Historic Preservation Division Office under separate cover.

DTS also requests to formally present an update on the project. This briefing will provide an overall project update and will allow discussion of any specific questions and/or concerns about this project.

Any formal written comments are requested by September 17, 2008, and should be addressed to:

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Ms. Laura Thielen  
Page 2  
August 18, 2008

If you would like for project staff to provide an update, please contact Ms. Stephanie Roberts at (808) 768-6143 to schedule a meeting. We look forward to updating you about the project.

Very truly yours,



WAYNE Y. YOSHIOKA  
Director

**Enclosure:**

- 1 CD containing the following:
  - Purpose and Need for the Project
  - Alternatives
  - Natural Resources Technical Memorandum
  - Water Resources Technical Memorandum
  - Ecosystems Technical Memorandum



U.S. Department  
of Transportation  
Federal Transit  
Administration

REGION IX  
Arizona, California,  
Hawaii, Nevada, Guam,  
American Samoa,  
Northern Mariana Islands

201 Mission Street  
Suite 1650  
San Francisco, CA 94105-1839  
415-744-3133  
415-744-2726 (fax)

Melanie Chinen  
Hawaii DLNR - State Historic Preservation Division  
PO Box 621  
Honolulu, HI 96809

Re: Invitation to Participate in the Environmental Review Process for the Honolulu High-Capacity Transit Corridor Project

Dear Ms. Chinen:

The Federal Transit Administration (FTA), in cooperation with the City and County of Honolulu, Department of Transportation Services (DTS) is initiating the preparation on a proposal by the City and County of Honolulu to implement a fixed-guideway transit system in the corridor between Kapolei and the University of Hawai'i at Mānoa with a branch to Waikiki. Alternatives proposed to be considered in the draft EIS include No Build and two Fixed Guideway Transit alternatives. The purpose of the project, as currently defined, is to provide high-capacity, high-speed transit in the highly congested east-west transportation corridor between Kapolei and the University of Hawai'i at Mānoa, as specified in the 2030 O'ahu Regional Transportation Plan (ORTP). The enclosed scoping information packet provides more details. A preliminary coordination plan including a schedule also is enclosed.

Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users establishes an enhanced environmental review process for certain FTA projects, increasing the transparency of the process, as well as opportunities for participation. The requirements of Section 6002 apply to the project that is the subject of this letter. As part of the environmental review process for this project, the lead agencies must identify, as early as practicable, any other Federal and non-Federal agencies that may have an interest in the project, and invite such agencies to become participating agencies in the environmental review process.<sup>1</sup> Your agency has been identified preliminarily as one that may have an interest in this project; accordingly, you are being extended this invitation to become actively involved as a participating agency in the environmental review process for the project.

As a participating agency, you will be afforded the opportunity, together with the public, to be involved in defining the purpose of and need for the project, as well as in determining the range of alternatives to be considered for the project. In addition, you will be asked to:

- Provide input on the impact assessment methodologies and level of detail in your agency's area of expertise;
- Participate in coordination meetings, conference calls, and joint field reviews, as appropriate; and
- Review and comment on sections of the pre-draft or pre-final environmental documents to communicate any concerns of your agency on the adequacy of the document, the alternatives considered, and the anticipated impacts and mitigation.

<sup>1</sup> Designation as a "participating agency" does not imply that the participating agency supports the proposed project or has any jurisdiction over, or special expertise concerning the proposed project or its potential impacts. A "participating agency" differs from a "cooperating agency," which is defined in regulations implementing the National Environmental Policy Act as "any Federal agency other than a lead agency which has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (or a reasonable alternative) for legislation or other major Federal action significantly affecting the quality of the human environment." 40 C.F.R. 5.1508.5.

If you elect to become a participating agency, you must accept this invitation in writing. The acceptance may be transmitted electronically to [Ted.Matley@dot.gov](mailto:Ted.Matley@dot.gov); please include the title of the official responding. In order to give your agency adequate opportunity to weigh the relevance of your participation in this environmental review process, written responses to this invitation are not due until after the interagency scoping meeting, scheduled for March 28, 2007 from 10:00 a.m. to 12:00 p.m. at Honolulu Hale, Mission Memorial Auditorium at 558 South King Street, Honolulu, HI 96813. You or your delegate is invited to represent your agency at this meeting. Written responses accepting designation as participating agencies should be transmitted to this office not later than April 20, 2007.

Additional information will be forthcoming during the scoping process. If you have questions regarding this invitation, please contact Mr. Ted Matley at (415) 744-2590 or Mr. Toru Hamayasu of DTS at (808) 768-8344. This contact information supersedes the information provided in the Notice of Intent.

Sincerely,



Leslie T. Rogers  
Regional Administrator

Attachments: Scoping Information Packet  
Draft Coordination Plan

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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 18, 2008

RT8/08-274151

Ms. Pua Aiu, Administrator  
State Historic Preservation Division  
State Department of Land and Natural Resources  
Kakuhihewa Building, Room 555  
601 Kamokila Boulevard  
Kapolei, Hawaii 96707

Dear Ms. Aiu:

Subject: Honolulu High-Capacity Transit Corridor Project  
Participating Agency Project Update

Thank you for agreeing to become involved in the environmental review process for the Honolulu High-Capacity Transit Corridor Project as a Participating Agency. Pursuant to stipulations in the National Environmental Policy Act (NEPA), Section 6002 of the *Safe, Accountable, Flexible, Efficient, Transportation Equity Act—A Legacy for Users (SAFETEA-LU)* guidance for federally funded projects, and Chapter 343 of the Hawaii Revised Statutes, and your participation as a Participating Agency with the Project, the City and County of Honolulu Department of Transportation Services (DTS) is providing internal and confidential intergovernmental copies of the Purpose and Need for the Project and Alternatives Chapters from the Draft Environmental Impact Statement and also pertinent Technical Reports for your review and comment. These Technical Reports include those regarding Historic Resources, Archaeological Resources, and Cultural Resources.

DTS also requests to formally present an update on the project. This briefing will provide an overall project update and will allow discussion of any specific questions and/or concerns about this project.

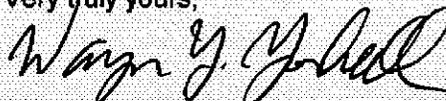
Any formal written comments are requested by September 17, 2008, and should be addressed to:

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Ms. Pua Aiu  
Page 2  
August 18, 2008

If you would like for project staff to provide an update, please contact Ms. Stephanie Roberts at (808) 768-6143 to schedule a meeting. We look forward to updating you about the project.

Very truly yours,



WAYNE Y. YOSHIOKA  
Director

Enclosure:

- 1 CD containing the following:
  - Purpose and Need for the Project
  - Alternatives
  - Historic Resources Technical Memorandum
  - Archaeological Resources Technical Memorandum
  - Cultural Resources Technical Memorandum

TP 906-136343



HAWAII COMMUNITY DEVELOPMENT AUTHORITY



KAKAOKO  
KALAELOA

Linda Lingle  
Governor

James S. Kometani  
Chairperson

Daniel Dinell  
Executive Director

677 Ala Moana Boulevard  
Suite 1001  
Honolulu, Hawaii  
96813

Telephone  
(808) 587-2870

Facsimile  
(808) 587-8150

E-Mail  
contact@hcdaweb.org

Web site  
www.hcdaweb.org

Ref. No.: PL TRANS 7.18

January 12, 2006

Mr. Kenneth Hamayasu  
City and County of Honolulu  
Department of Transportation Services  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

JAN 17 9 16 AM '06

TRANS PLANNING  
DTS

Dear Mr. Hamayasu:

Re: The Honolulu High-Capacity Transit Corridor Project  
Environmental Impact Statement ("EIS") Preparation Notice

Thank you for the opportunity to comment on the EIS Preparation Notice. The Hawaii Community Development Authority ("HCDA") is the redevelopment agency for the Kakaoko and Kalaeloa Community Development Districts as authorized under Chapter 206E, Hawaii Revised Statutes. Our comments specifically pertain to the portions of the various fixed-guideway alignments that impact the Kalaeloa and Kakaoko districts. We offer the following comments for your consideration.

Kakaoko. The EIS Preparation Notice indicates that the Draft EIS will assess impacts of the alternative alignments with respect to social, environmental and financial resources. However, in addition, please include detailed information on the various alignments through Kakaoko, including sections of the tunnels, the system's transition into an above-grade alignment as well as the above-grade alignment through the district. We are especially concerned with the project's impact on properties and infrastructure along the proposed alignment. Please identify any required relocation and/or land acquisitions along the alignment route.

The proposed action may require HCDA's Development Permit approval for any construction-related activities along the alignment route within the Kakaoko District.

Kalaeloa. We find that Alternative 4d will better serve future residents and business in the area for the following reasons:

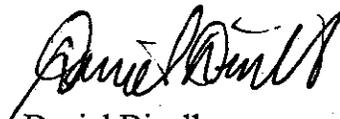
- Alternative 4d is more centrally located within the Kapolei/Kalaeloa district and will serve a greater number of people who live and work in Kalaeloa.

Mr. Kenneth Hamayasu  
Page Two  
January 12, 2006

- Alternative 4d most closely resembles the transit alignment proposed in the Kalaeloa Master Plan ("Master Plan"). The Master Plan incorporates transit oriented development ("TOD") along the realigned Saratoga Road, which is compatible with Alternative 4d. TOD would provide a new opportunity for the residents of Kapolei and Ewa to take full advantage of the transit system. Such a housing type would provide an alternative to the single family and townhouses that dominate Ewa today.
- There is ample land in Kalaeloa to accommodate a park and ride type facility for commuters from Ewa. Residents from Ewa and Ocean Pointe could enter and egress Kalaeloa from Geiger Road and the planned extension of North South Road.
- Use of land in Kalaeloa for a transit/rail base yard was specified in our Kalaeloa Master Plan and was favorably received by the community as an opportunity to create jobs and further transit oriented development.

We appreciate the opportunity to comment on the subject EIS Preparation Notice and look forward to additional information on the Alternative Analysis. We are generally supportive of the proposed high-capacity transit system and anticipate that the project will enhance the livability of the Kalaeloa and Kakaako districts. Should you have any questions with regard to Kakaako, please call Teney Takahashi and with regard to Kalaeloa, Stanton Enomoto. Both can be reached at 587-2870.

Sincerely,



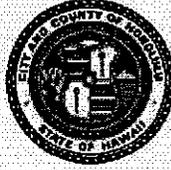
Daniel Dinell  
Executive Director

DD/ST:II

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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 25, 2008

RT8/08-276161

Mr. Anthony Ching, Executive Director  
Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawaii 96813

Attention: Mr. Deepak Neupane, P.E. AR

Dear Mr. Ching:

Subject: Section 106 Coordination for the Honolulu High-Capacity Transit  
Corridor Project

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu, Department of Transportation Services (DTS), seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

DTS previously invited your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project in a letter dated December 5, 2007. DTS is expected to issue the Draft Environmental Impact Statement for the project in Fall 2008.

As part of the Section 106 process, DTS would like to seek your input regarding concerns and questions about the project including identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize, or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources. Enclosed is one (1) printed copy of the Historical Resources Technical Report along with one (1) CD containing the Archaeological Resources, Cultural Resources, and Historical Resources Technical Reports.

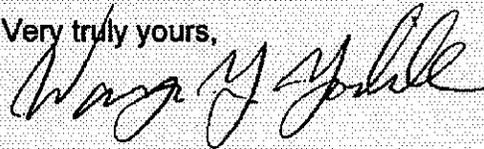
Mr. Anthony Ching, Executive Director  
Page 2  
August 25, 2008

Any formal written comments are requested by September 17, 2008, and should be addressed to:

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Project staff is also available to brief your organization about the project if requested. Should you have any questions regarding this matter, please contact Ms. Stephanie Roberts at 768-6143.

Very truly yours,



Wayne Y. Yoshioka  
Director

**Enclosures:**

Historical Resources Technical Report  
CD containing PDF of Archaeological Resources,  
Cultural Resources, and Historical Resources  
Technical Reports

RT9/08 - 279827



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



KAKAOKO  
KALAELOA

Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
Executive Director

677 Ala Moana Boulevard  
Suite 1001  
Honolulu, Hawaii  
96813

Telephone  
(808) 587-2870

Facsimile  
(808) 587-8150

E-Mail  
contact@hcdaweb.org

Web site  
www.hcdaweb.org

Ref. No.: PLTRANS 7.18

September 16, 2008

DIRECTOR'S OFFICE  
SECTION OF  
TRANSPORTATION SERVICES

08 SEP 18 AIO: 22

RECEIVED

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Dear Mr. Yoshioka:

Re: Section 106 – Coordination for the Honolulu  
High-Capacity Transit Corridor Project

Thank you for the opportunity to review the documents relating to the Honolulu High-Capacity Transit Corridor Project. In particular, we have reviewed the proposal with respect to effects on historic, cultural, and archaeological resources.

We have the following comments to offer:

1. On page 5-21 of the Cultural Technical Report, reference was made to the "Queen Street Burial Mound" and the "Halekauwila Street Burial Mound." The location of these burial mounds within a Kakaako Community Development District ("KCDD") reference map would greatly enhance public and agency review.
2. Based on the potential of the project to impact pre-contact and post-contact archaeology and burials in the Kakaako District, we recommend:
  - (a) an Archaeological Inventory Survey is conducted along the proposed area of the Transit Corridor;
  - (b) a preservation plan for known historical and cultural resources is articulated; and
  - (c) a strategy is defined for coordinating the development of the Transit Corridor with the likely discoveries of iwi or other finds in the Transit Corridor Project area.

Mr. Wayne Yoshioka  
Page Two  
September 16, 2008

The City and County should work closely with the State Historic Preservation Division, the Office of Hawaiian Affairs, and Native Hawaiian community in developing and implementing these strategies, protocols and programs.

3. The Hawaii Community Development Authority ("HCDA") should be notified in writing of any burials or archaeological finds that may be unearthed due to the project.
4. We recommend that your department work with area landowners (General Growth Properties, Inc. and Kamehameha Schools) and the HCDA in finalizing the alignment of the Transit Corridor and station locations within the KCDD.

If there are any questions, please feel free to call me at 587-2870.

Sincerely,



Anthony J. H. Chung  
Executive Director

AJHC/DN/TM:ll



STATE OF HAWAII  
 OFFICE OF HAWAIIAN AFFAIRS  
 711 KAPI'OLANI BOULEVARD, SUITE 500  
 HONOLULU, HAWAII 96813

JAN 11 10 30 AM '06

TRANS PLANNING  
 CTS

HRD05/2156B

January 4, 2005

Kenneth Hamayasu  
 Transportation Planning Division  
 Department of Transportation Services  
 City and County of Honolulu  
 650 South King Street, 3<sup>rd</sup> Floor  
 Honolulu, HI 96813

**RE: Environmental Impact Statement Preparation Notice (EISPN) for the Proposed Honolulu High-Capacity Transit Corridor Project, Various Ahupua'a, O'ahu, Various TMKs.**

Dear Mr. Hamayasu,

Staff members from the Office of Hawaiian Affairs (OHA) attended your December 13 scoping meeting and received a copy of the Environmental Impact Statement Preparation Notice (EISPN) for the above listed proposed project. OHA offers the following comments:

- 1) As listed on page 21 of the EISPN, several of Honolulu's Historic Districts may be adversely impacted by some of the proposed alternatives. These include the Pearl Harbor Historic District, the Merchant Street Historic District, Chinatown Historic District and the Hawai'i Capitol Hill District. Our staff is interested in knowing whether an archaeologist and/or cultural historian have been contracted to consult your agency as to which alternatives will have the least impact to these, and other, areas of historical and cultural significance.
- 2) Some of the proposed alternative alignments may negatively impact specimens of ko'oloa'ula (*Abutilon menziesii*). This plant is particularly important in Native Hawaiian culture as it is known to been used medicinally. It is also worth noting that the Federal government is currently drafting a conservation plan to protect this plant; estimates made during observations have figured that only 500 individual ko'oloa'ula plants exist today in Hawai'i. Because of this, it is crucial that the specimens in Kapolei not be disturbed.

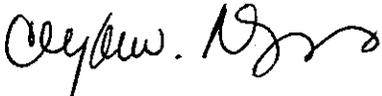
Kenneth Hamayasu  
January 4, 2005  
Page 2

At this time, our staff does not have enough specific information to make additional comments concerning the proposed Honolulu High-Capacity Transit Corridor Project. Please forward our office a copy of the upcoming Alternatives Assessment in which the above stated concerns will likely be addressed.

OHA further requests your assurances that if the project goes forward, should iwi or Native Hawaiian cultural or traditional deposits be found during ground disturbance, work will cease, and the appropriate agencies will be contacted pursuant to applicable law.

Thank you for the opportunity to comment. If you have further questions or concerns, please contact Jesse Yorck at (808) 594-0239 or [jessey@oha.org](mailto:jessey@oha.org).

‘O wau iho nō,



Clyde W. Nāmu‘o  
Administrator

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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 18, 2008

RT8/08-274143

Mr. Clyde Nāmu`o  
Office of Hawaiian Affairs  
711 Kapi`olani Boulevard, Suite 500  
Honolulu, Hawaii 96813

Dear Mr. Nāmu`o:

**Subject: Honolulu High-Capacity Transit Corridor Project  
Participating Agency Project Update**

Thank you for agreeing to become involved in the environmental review process for the Honolulu High-Capacity Transit Corridor Project as a Participating Agency. Pursuant to stipulations in the National Environmental Policy Act (NEPA), Section 6002 of the *Safe, Accountable, Flexible, Efficient, Transportation Equity Act—A Legacy for Users* (SAFETEA-LU) guidance for federally funded projects, and Chapter 343 of the Hawaii Revised Statutes, and your participation as a Participating Agency with the Project, the City and County of Honolulu Department of Transportation Services (DTS) is providing internal and confidential intergovernmental copies of the Purpose and Need for the Project and Alternatives Chapters from the Draft Environmental Impact Statement and also pertinent Technical Reports for your review and comment. These Technical Reports include those regarding Historic Resources, Archaeological Resources, and Cultural Resources.

DTS also requests to formally present an update on the project. This briefing will provide an overall project update and will allow discussion of any specific questions and/or concerns about this project.

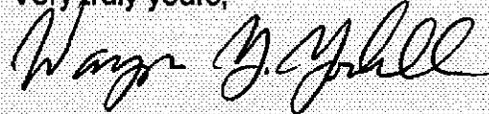
Any formal written comments are requested by September 17, 2008, and should be addressed to:

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Mr. Clyde Nāmu'o  
Page 2  
August 18, 2008

If you would like for project staff to provide an update, please contact Ms. Stephanie Roberts at (808) 768-6143 to schedule a meeting. We look forward to updating you about the project.

Very truly yours,



WAYNE Y. YOSHIOKA  
Director

Enclosure:

CD containing the following:

- Purpose and Need for the Project
- Alternatives
- Historic Resources Technical Memorandum
- Archaeological Resources Technical Memorandum
- Cultural Resources Technical Memorandum

R79/08-281301

PHONE (808) 594-1888

FAX (808) 594-1885



**STATE OF HAWAII**  
**OFFICE OF HAWAIIAN AFFAIRS**  
711 KAPI'OLANI BOULEVARD, SUITE 500  
HONOLULU, HAWAII 96813

HRD08/2156 H

08 SEP 29 A10 : 21

RECEIVED

DEPARTMENT OF TRANSPORTATION SERVICES

September 23, 2008

Wayne Y. Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

**RE: Honolulu High-Capacity Transit Corridor Project – Participating Agency Project Update**

Aloha e Wayne Y. Yoshioka,

The Office of Hawaiian Affairs (OHA) is in receipt of the above-mentioned letter dated August 18, 2008. The City and County of Honolulu Department of Transportation Services (DTS) has provided internal and confidential intergovernmental copies of the "Purpose and Need for the Project" and "Alternatives" chapters from the Draft Environmental Impact Statement (DEIS) and also pertinent Technical Reports for the Honolulu High-Capacity Transit Corridor Project (Project). OHA has reviewed the project and offers the following comments.

The Project extends from Kapolei to UH Mānoa with future planned spurs in Waikīkī, UH Mānoa, and the Airport areas. In addition to the fixed guideway, the project will also include the construction of transit stations and supporting facilities. The supporting facilities include a vehicle maintenance facility, transit centers, park-and-ride lots, and traction power substations.

The mayor of the City and County of Honolulu has expressed a highly ambitious construction timetable for the Project. We realize that if environmental compliance takes a little longer than expected, the start of project construction must be pushed back until all necessary approvals are met. The proposed timetable of the Project is of great concern to our office. We request assurances that all environmental compliance requirements will be fulfilled before the start of construction.

Our office is also concerned about the level of anticipated archeological, cultural, and historic investigations that are planned to be conducted for the Project. After a review of Chapters 1 and 2 of the DEIS, the documentation states that the project study area will extend from Kapolei to UH Mānoa. The survey area of the archeological, cultural, and historic reports will only include the currently funded project area which stretches from East Kapolei to Ala Moana. This would not include the Airport, UH Mānoa and Waikīkī routes and spurs, which would therefore require additional environmental compliance to comply with Hawaii Revised Statutes (HRS) Chapter 343 and the National Historic Preservation Act of 1966 and its implementing regulations.

The Area of Potential Effect (APE) includes an approximate 300-foot-wide corridor centered on the project alignment. Included within the APE are the footprint of potential locations of project-related park-and-ride lots, maintenance facilities, and construction staging areas. According to the submission, confining the archeological resources within the APE to the limits of ground disturbance is warranted, because the surrounding built environment is largely developed and becoming progressively more urban as the Project progresses Koko Head.

As a result of the surrounding built environment of the Project, the submission states that the archeological resource identification efforts may include a phased identification process, which would be detailed in a Memorandum of Agreement (MOA). The approval of the Archeological Inventory Survey Plan (AIS), Archeological Monitoring Plan (AMP), and Burial Treatment Plan (BTP) should also be submitted to review by the SHPD before the commencement of each planned phase of the Project. The BTP should also be submitted to the O'ahu Island Burial Council (OIBC) for their approval.

Furthermore, the archeological technical report states that consultation with Native Hawaiian groups and organizations, including Hui Mālama, OHA, and the OIBC will be particularly important. OHA stresses that our office should not be the end-all for consultation with Native Hawaiian Organizations (NHOs). Consultation efforts must be conducted with each individual NHO that may have a special connection, expertise, or desire to provide input during the consultation process. OHA also stresses the importance of consulting with Native Hawaiian individuals and families that may have particular ties to areas within the APE of the project.

The OIBC has been actively involved in consultation with the DTS and its contractor Parsons Brinkerhoff (PB) concerning the Project. As early as October 2007, the DTS has discussed the project methodology with the OIBC. During recent OIBC meetings, the OIBC has expressed grave concerns with the methodology of the project and have actively asked for the exact details on how an MOA would be drafted for the Project. These concerns should be addressed by the DTS and its contractors of the Project.

OHA would defer to the OIBC on all decision-making authority that an MOA would entail. The OIBC has statutory obligations to protect iwi kūpuna and burial sites, pursuant to HRS Chapter 6E. OHA strongly advocates that the OIBC and OHA be included as invited

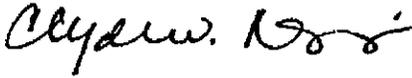
Wayne Y. Yoshioka, Director  
September 23, 2008  
Page 3

signatories to the MOA by the Federal Highways Administration, the lead federal agency on the project.

Finally, we request the applicant's assurances that should iwi kūpuna or Native Hawaiian cultural or traditional deposits be found during the construction of the project, work will cease, and the appropriate agencies will be contacted pursuant to applicable law.

Thank you for the opportunity to comment. If you have further questions, please contact Jason Jeremiah by phone at (808) 594-1816 or e-mail him at [jasonj@oha.org](mailto:jasonj@oha.org).

'O wau iho nō me ka 'oia'i'o,



Clyde W. Nāmu'o  
Administrator

7p/06-134712



**UNIVERSITY OF HAWAII**

CHANCELLOR, UNIVERSITY OF HAWAII—WEST O'AHU

January 4, 2006

Mr. Toru Hamayasu  
Department of Transportation Services  
City & County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, HI 96813

JAN 4 2 02 PM '06  
TRANSIT PLANNING

**SUBJECT: UH WEST O'AHU - MASS TRANSIT ALTERNATIVES - PREFERRED TRANSIT ALIGNMENT (IN THE VICINITY OF THE UH WEST O'AHU PROPERTY)**

Dear Toru:

Thank you for spending time with us in mid-November to discuss the proposed transit system and alignment options. As we had indicated at the meeting, the University of Hawai'i – West O'ahu (UHWO) has already incorporated provisions for a transit route and transit stop in its Long Range Development Plan (LRDP) that can service the campus. This route is based on the Ewa Sustainable Communities Plan. The UHWO strongly supports a fixed rail transit system. We recognize its value as an alternative mode of transportation for future students and residents in the rapidly growing West O'ahu region.

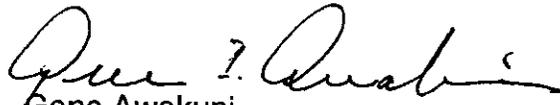
For the transit system to be most effective, we believe it is critical that the selected alignment be in close proximity to our campus and easily accessible to our students. In addition, the alignment should be compatible with our land use plan and the transportation network we will establish for the campus. We are also cognizant of the regional implications of the proposed transit corridor and have coordinated our review of the proposed transit alignment with adjacent landowners, including the Department of Hawaiian Home Lands (DHHL) and DR Horton-Schuler Division. After review of the alternatives, our preferred alignment within the Ewa region, would be a route that runs along Farrington Highway and turns down the North-South Road to a transit stop on our property, continues along the North-South Road to a possible second stop on or near the southern portion of our property, and then into the City of Kapolei. (See attached)

Mr. Toru Hamayasu  
January 4, 2006  
Page 2

We would also like to mention that in selecting a preferred transit route, consideration should be given to accessibility to transit stops for each of the UH campuses within the transit corridor, including Leeward Community College, Honolulu Community College, and the University of Hawai'i - Manoa. If each of the campuses is within close proximity to a transit station, there will be greater opportunity for students and faculty to move easily between campuses using the transit system. We know from the experience of other cities that have recently established fixed rail systems such as Salt Lake City students are among the early adopters of this kind of transportation alternative and can contribute significantly to the success of the project.

Thank you for providing us with an opportunity to provide written comment on this project. We look forward to continuing our coordinated efforts in incorporating the proposed transit system into our plans for the campus. Should you have any questions, please contact me at 454-4750 or Allan Ah San at 692-0918.

Sincerely,

  
Gene Awakuni  
Chancellor

Attachment

cc: Micah Kane, Department of Hawaiian Home Lands  
Mike Jones, DR Horton - Shuler Division  
Sam Callejo, Vice President for Administration (UHM)  
Jan Yokota, Director of Capital Improvements

bc: Ramsey Pederson, Chancellor (HCC)  
Peter Quiqley, Interim Chancellor (LCC)  
Denise Konan, Interim Chancellor (UHM)

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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

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**FILE COPY**

**MAR 16 2007**

MUFI HANNEMANN  
MAYOR



MELVIN N. KAKU  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

March 16, 2007

TPD07-00109

Mr. David McClain, President  
University of Hawaii System  
State of Hawaii  
2444 Dole Street, Bachman 202  
Honolulu, Hawaii 96822

Dear Mr. McClain:

Subject: Invitation to Participate in the Environmental Review Process  
for the Honolulu High-Capacity Transit Corridor Project

The Federal Transit Administration (FTA), in cooperation with the City and County of Honolulu, Department of Transportation Services (DTS), is initiating the preparation on a proposal by the City and County of Honolulu to implement a fixed guideway transit system in the corridor between Kapolei and the University of Hawai'i at Mānoa with a branch to Waikīkī. Alternatives proposed to be considered in the draft EIS include No Build and two Fixed Guideway Transit alternatives. The purpose of the project, as currently defined, is to provide high-capacity, high-speed transit in the highly congested east-west transportation corridor between Kapolei and the University of Hawai'i at Mānoa, as specified in the 2030 O'ahu Regional Transportation Plan (ORTP). The enclosed scoping information packet provides more details. A preliminary coordination plan including a schedule also is enclosed.

Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users establishes an enhanced environmental review process for certain FTA projects, increasing the transparency of the process, as well as opportunities for participation. The requirements of Section 6002 apply to the project that is the subject of this letter. As part of the environmental review process for this project, the lead agencies must identify, as early as practicable, any other Federal and non-Federal agencies that may have an interest in the project, and invite such agencies to become participating agencies in the environmental review process.<sup>1</sup> Your agency has been identified preliminarily as one that may have an interest in this project; accordingly, you are being extended this invitation to become actively involved as a participating agency in the environmental review process for the project.

<sup>1</sup> Designation as a "participating agency" does not imply that the participating agency supports the proposed project or has any jurisdiction over, or special expertise concerning the proposed project or its potential impacts. A "participating agency" differs from a "cooperating agency," which is defined in regulations implementing the National Environmental Policy Act as "any Federal agency other than a lead agency which has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (or a reasonable alternative) for legislation or other major Federal action significantly affecting the quality of the human environment." 40 C.F.R. § 1508.5.

Mr. David McClain

Page 2

March 16, 2007

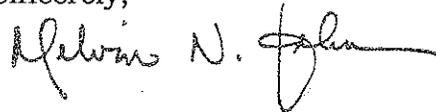
As a participating agency, you will be afforded the opportunity, together with the public, to be involved in defining the purpose of and need for the project, as well as in determining the range of alternatives to be considered for the project. In addition, you will be asked to:

- Provide input on the impact assessment methodologies and level of detail in your agency's area of expertise;
- Participate in coordination meetings, conference calls, and joint field reviews, as appropriate; and
- Review and comment on sections of the pre-draft or pre-final environmental documents to communicate any concerns of your agency on the adequacy of the document, the alternatives considered, and the anticipated impacts and mitigation.

If you elect to become a participating agency, you must accept this invitation in writing. The acceptance may be transmitted electronically to [fmiyamoto@honolulu.gov](mailto:fmiyamoto@honolulu.gov); please include the title of the official responding. In order to give your agency adequate opportunity to weigh the relevance of your participation in this environmental review process, written responses to this invitation are not due until after the interagency scoping meeting, scheduled for March 28, 2007 from 10:00 a.m. to 12:00 p.m. at Honolulu Hale, Mission Memorial Auditorium, at 558 South King Street, Honolulu, Hawaii 96813. You or your delegate is invited to represent your agency at this meeting. Written responses accepting designation as participating agencies should be transmitted to this office not later than April 20, 2007.

Additional information will be forthcoming during the scoping process. If you have questions regarding this invitation, please contact Mr. Toru Hamayasu of DTS at (808) 768-8344.

Sincerely,

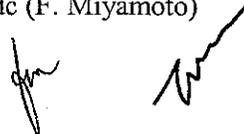


MELVIN N. KAKU  
Director

Enclosures:

1. Scoping Information Package
2. Coordination Plan

dc (F. Miyamoto)



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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 788-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 18, 2008

RT8/08-274154

Mr. Gordon G. W. Lum, Executive Director  
Oahu Metropolitan Planning Organization  
Ocean View Center  
707 Richards Street, Suite 200  
Honolulu, Hawaii 96813

Dear Mr. Lum:

**Subject: Honolulu High-Capacity Transit Corridor Project  
Participating Agency Project Update**

Thank you for agreeing to become involved in the environmental review process for the Honolulu High-Capacity Transit Corridor Project as a Participating Agency. Pursuant to stipulations in the National Environmental Policy Act (NEPA), Section 6002 of the *Safe, Accountable, Flexible, Efficient, Transportation Equity Act—A Legacy for Users* (SAFETEA-LU) guidance for federally funded projects, and Chapter 343 of the Hawaii Revised Statutes, and your participation as a Participating Agency with the Project, the City and County of Honolulu Department of Transportation Services (DTS) is providing internal and confidential intergovernmental copies of the Purpose and Need for the Project and Alternatives Chapters from the Draft Environmental Impact Statement for your review and comment.

DTS also requests to formally present an update on the project. This briefing will provide an overall project update and will allow discussion of any specific questions and/or concerns about this project.

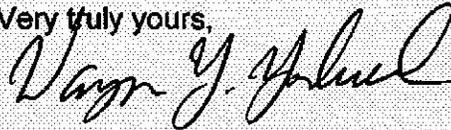
Any formal written comments are requested by September 17, 2008, and should be addressed to:

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Mr. Gordon G. W. Lum  
Page 2  
August 18, 2008

If you would like for project staff to provide an update, please contact Ms. Stephanie Roberts at (808) 768-6143 to schedule a meeting. We look forward to updating you about the project.

Very truly yours,



WAYNE Y. YOSHIOKA  
Director

Enclosure:  
1 CD containing the following:  
Purpose and Need for the Project  
Alternatives



September 3, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Dear Mr. Yoshioka:

Honolulu High-Capacity Transit Corridor Project – Participating Agency Project Update

Thank you for the opportunity to review and comment on the Purpose and Need for the Project and Alternatives chapters from the Draft Environmental Impact Statement for the Honolulu High-Capacity Transit Corridor Project. We offer the following comments:

- Reference to the print date of 2006 for the *Oahu Regional Transportation Plan 2030* (ORTP 2030) on pages 1-19 and 2-1 is outdated. A print date of 2007 for this document is referenced on pages 2-2, 2-8, and 2-37. The date of 2007 should be consistently used as this is the latest version of the *ORTP 2030* (as of Amendment #1).
- Pages 2-2 and 2-6 (Table 2-2) noted that the OahuMPO rejected the Pearl Harbor tunnel based on the cost and limited benefit. This statement is partially correct.

The Pearl Harbor tunnel was not included in the fiscally constrained plan, but instead, placed in the illustrative category, due to its \$7 billion estimated cost and the State's lack of authority to collect tolls. Illustrative projects are those projects that are considered high-priority for inclusion into the regional transportation plan should additional, firmly established funding revenue sources become available. Illustrative projects are not considered to be a part of the officially endorsed regional transportation plan.

- The date of July 1, 2008 on the last line of the first column on page 1-14 should be changed to July 8, 2008 (date the zipper lane occupancy requirement was increased to three or more).
- There is a typo on the eighth line, of the first paragraph on page 1-15.

**Oahu Metropolitan Planning Organization**

Ocean View Center / 707 Richards Street, Suite 200 / Honolulu, Hawaii 96813-4623  
Telephone (808) 587-2015 • (808) 523-4178 / Fax (808) 587-2018 / email: [REDACTED]

Mr. Wayne Yoshioka  
Page 2  
September 3, 2008

- The 326,000 daily vehicle hours of delay attributed to the ORTP and cited on the last sentence of the first paragraph on page 1-20 does not correspond to the figure used in the ORTP 2030.
- The first sentence of the second paragraph, of the second column on Page 2-37 should be broken into two sentences. It should read:

“The planned extensions are included as illustrative projects in the *Oahu Regional transportation Plan 2030* (OahuMPO 2007). The City anticipates completion of these extensions at some time in the future prior to 2030 as separate projects that would receive detailed environmental review.”

This modification is proposed to clarify that it is the City, not the ORTP 2030 that anticipates completion of the extensions prior to 2030. As defined by the ORTP 2030, the extensions, as illustrative projects are not assumed to be part of the 2030 plan unless additional, firmly established funding revenues sources become available.

Sincerely,



Gordon G.W. Lum  
Executive Director

DIRECTOR'S OFFICE  
DEPT. OF  
TRANSPORTATION SERVICES

08 SEP 4 P 3: 46

RECEIVED

## **Section 106 Consulting Parties**



TP 243302

U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION IX  
Arizona, California,  
Hawaii, Nevada, Guam  
American Samoa,  
Northern Mariana Islands

201 Mission Street  
Suite 1650  
San Francisco, CA 94105-1839  
415-744-3133  
415-744-2726 (fax)

DEC 26 2007

Ms. Laura H. Thielen  
State Historic Preservation Officer and Chairperson  
Department of Land and Natural Resources  
State Historic Preservation Division  
Kakuhihewa Building, Room 555  
601 Kāmokila Boulevard  
Kapolei, Hawai'i 96707

DTS  
TRANS PLANNING  
JAN 7 11 51 AM '07

RE: Honolulu High-Capacity Transit Corridor  
Project Coordination on Determination of Area of  
Potential Effect

Dear Ms. Thielen:

The City and County of Honolulu Department of Transportation Services (DTS) and the U.S. Department of Transportation Federal Transit Administration (FTA) are in the process of defining the Area of Potential Effect (APE) for the Honolulu High-Capacity Transit Corridor Project in accordance with 36 CFR 800.16(d).

The project will include the construction of an elevated transit system between Kapolei and the University of Hawai'i at Mānoa, with an extension to Waikīkī. In addition to the guideway and stations, the project will include construction of a transit vehicle maintenance facility, several park-and-ride lots, traction power sub-stations, and improvements to the bus system to interface with the fixed guideway system. The attached map illustrates the extent of the planned system, including two optional sites for the maintenance facility. Planning and environmental review is being completed for the project extents; however, anticipated funding is only available for completion of the First Project, which would extend from the vicinity of the planned University of Hawai'i at West O'ahu to Ala Moana Center. This portion of the overall project is anticipated to be completed and operational by 2018, while the schedule for any future extensions is indeterminate.

Pending your comment, the APE for the project is proposed to include the following:

- For **Archaeological Resources**, the APE is proposed to be all areas of direct ground disturbance. This would include any areas excavated for the placement of piers to support the elevated structure and foundations for structures, or graded to provide parking. Confining the Archaeological Resources APE to the limits of ground disturbance is warranted because the surrounding built environment is largely developed, becoming progressively more urban as the project progresses Koko Head. As a result of the existing level of development, construction of the elevated guideway would not generate secondary effects, such as visual, atmospheric, or audible elements, that could diminish the integrity

of archaeological resources. Accordingly, direct construction impacts to known and as-yet-  
unidentified archaeological resources are the concern.

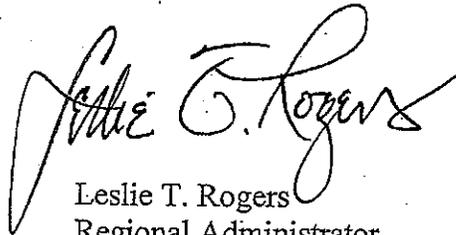
- For **Historic Resources**, the APE is proposed to extend one parcel deep from the project alignment and traction power sub-stations. In the vicinity of stations, park-and-ride facilities, and maintenance and storage facility alternatives, the coverage of the APE is proposed to include the entire blocks on which the stations or facilities are located, to a maximum of 500 feet from the project element where there is no defined block. Similarly, for portions of the alignment within or adjacent to historic districts, the APE is proposed to extend one block, rather than one parcel deep.

Direct construction impacts to known and as-yet-unsurveyed historic resources are the main concern. Alterations to the setting of historic resources (where the setting is a qualifying characteristic of its eligibility for the National Register) are also addressed in the above definition of the APE. Since stations, park-and-ride facilities, and the maintenance facility could have a greater effect, the APE is larger around them. It is also larger where the alignment is in or near an eligible historic district because of the potential greater importance of setting to historic districts.

Once the project's APE has been defined, consultation will continue with your office regarding identifying historic properties within the APE.

If you have any questions, please call Ted Matley, FTA Transportation Representative, at (415) 744-2590. Thank you.

Sincerely,



Leslie T. Rogers  
Regional Administrator

Enclosures:

Map of Honolulu High-Capacity Transit Corridor Project

Compact disc containing detailed maps of the proposed APE for historic resources

cc: Administrator, State Historic Preservation Division

→ Mr. Toru Hamayasu, DTS (w/o enclosures)

LINDA LINGLE  
GOVERNOR OF HAWAII



**STATE OF HAWAII**  
**DEPARTMENT OF LAND AND NATURAL RESOURCES**

STATE HISTORIC PRESEERVATION DIVISION  
601 KAMOKILA BOULEVARD, ROOM 555  
KAPOLEI, HAWAII 96707

LAURA H. THELEN  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT

RUSSELL Y. TSUIJI  
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CONSERVATION AND RESOURCES ENFORCEMENT

ENGINEERING  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
KAHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

February 4, 2008

Ms. Leslie T. Rogers, Regional Administrator  
U.S. Department of Transportation  
Federal Transit Administration  
Region IX  
201 Mission Street  
Suite 1650  
San Francisco, California 94105-1839

**LOG NO: 2008.0098**  
**DOC NO: 0802AL01**  
**Architecture**  
**Archaeology**

Dear Ms. Rogers:

**SUBJECT: Section 106 Coordination**  
**Honolulu High-Capacity Transit Corridor Project Determination of Area of**  
**Potential Effect**  
**TMK: (1)-various**

This letter acknowledges your transmittal of December 26, 2007, received in our Kapolei office on January 8. Through consultation with the City and County of Honolulu Department of Transportation Services and the U.S. Department of Transportation Federal Transit Administration and in accordance with 36 CFR 800.16(d), the proposed project area of potential effect (APE) is outlined for consideration. SHPD staff has participated in site visits of the proposed route on November 14, 2007 and January 10, 2008 with Mason Architects, Inc. and other interested parties.

The proposed project is for construction of an elevated transit system between Kapolei and the University of Hawai'i at Mānoa, with an extension to Waikīkī. The scope of work includes the guideway, transit stations, a transit vehicle maintenance facility (two optional sites), park-and-ride lots, traction power sub-stations, and improvements to the existing bus system. The first phase of the project, from the planned University of Hawai'i at West O'ahu to Ala Moana Center, is anticipated for completion by 2018, with future extensions as yet indeterminate.

Upon review of the proposed APE, for archaeological resources, in addition to all areas of direct ground disturbance, the area of potential effect should include a greater area, to be determined through consultation with native Hawaiian organizations, as well as other knowledgeable individuals of the community, to account for any visual effects the proposed undertaking may have on traditional cultural properties (TCP's). We suggest consulting native Hawaiian organizations and other knowledgeable community members to identify any traditional cultural properties that may be adversely affected by the proposed undertaking.

Ms. Leslie T. Rogers, Regional Administrator  
Federal Transit Administration  
Page 2 of 3

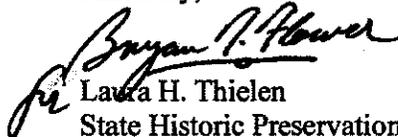
LOG NO: 2008.0098  
DOC NO: 0802AL01  
Architecture  
Archaeology

For historic architectural resources of the built environment, the APE is proposed to extend one parcel deep from the project alignment and traction power sub-stations. In the vicinity of transit stations, park-and-ride lots, and maintenance and storage facilities, the APE is proposed to extend the entire block on which stations or facilities are located or to a maximum of 500 feet in less developed areas. For portions of the proposed alignment within or adjacent to historic districts, the APE will also extend one block, rather than one parcel, deep.

Whereas it regards the potential impact of direct construction and alteration to local historic built contexts, these will be determined following an ongoing survey of resources. The SHPD acknowledges that consultation will now proceed to identify and consult on individual historic properties within the identified APE.

The SHPD concurs with the Federal Transit Administration's identified area of potential effect and its due consideration of historic architectural and archaeological resources. Thank you sincerely for the opportunity to comment. Should you have any additional questions or concerns, please do not hesitate to contact Dr. Astrid Liverman, regarding architectural matters, or Teresa E. Davan, regarding archaeological matters, in our O'ahu office at (808) 692-8015.

Sincerely,



Laura H. Thielen  
State Historic Preservation Officer and Chairperson

AMBL:

U.S. Department of the Interior, National Park Service

Dr. Elaine Jackson-Retondo, Architectural Historian, Architectural Resources Team, Specific  
Great Basin Support Office, 1111 Jackson Street, Suite 700, Oakland, California 94607-  
4807

Frank Hays, Director, Pacific West Region-Honolulu, West Regional Office, 300 Ala Moana,  
Blvd., Room 6-226, Honolulu, Hawaii 96850

National Trust for Historic Preservation

Elizabeth S. Merritt, Deputy General Counsel, Law Department, 1785 Massachusetts Avenue  
N.W., Washington, D.C. 20036

Anthea Hartig, Director, The Hearst Building, 5 Third Street, Suite 707, San Francisco,  
California 94103

Anthony Veerkamp, Senior Program Officer, The Hearst Building, 5 Third Street, Suite 707,  
San Francisco, California 94103

Historic Hawaii Foundation

Kiersten Faulkner, Executive Director, P.O. Box 1658, Honolulu, Hawaii 96806

Ms. Leslie T. Rogers, Regional Administrator  
Federal Transit Administration  
Page 3 of 3

**LOG NO: 2008.0098**  
**DOC NO: 0802AL01**  
**Architecture**  
**Archaeology**

Advisory Council on Historic Preservation

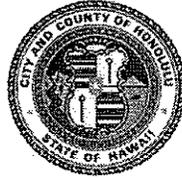
Don L. Klima, Director (Eastern and Western Offices), Eastern Office (EO), 1100  
Pennsylvania Avenue N.W., Suite 803, Washington, D.C. 20004

# CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813

Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 25, 2008

RT8/08-275753

Honorable Laura H. Thielen, Chairperson  
Department of Land and Natural Resources  
Kakuhihewa Building, Room 555  
601 Kamokila Boulevard  
Kapolei, Hawai'i 96707

Attention: Ms. Pua Aiu  
State Historic Preservation Division

Dear Ms. Thielen:

Subject: Section 106 Coordination for the Honolulu High-Capacity Transit  
Corridor Project

The State of Hawai'i, Department of Land and Natural Resources, Historic Preservation Division, has been identified as a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project (per our letter to your office dated December 5, 2007 [enclosed]). As part of this process, we are transmitting the enclosed hard copies of the Archaeological Resources and Cultural Resources Technical Reports for the subject project for your review and comment. In addition, enclosed is a CD containing these two reports along with the Historic Resources Technical Report.

The Department of Transportation Services, in cooperation with the Federal Transit Administration, is expecting to issue the Draft Environmental Impact Statement (EIS) for the subject project in Fall 2008. In addition to being a Section 106 consulting party, the Department of Land and Natural Resources is a participating agency in the environmental review process for the project.

Project staff is in the process of contacting all Section 106 consulting parties requesting to update agencies and organizations on the Project's status, as well as discuss questions and/or concerns about archaeological, cultural, and/or historic resources.

Honorable Laura H. Thielen, Chairperson  
Page 2  
August 25, 2008

Any formal written comments on the three technical reports are requested by September 17, 2008, and should be addressed to:

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

If you would like project staff to provide an update, please contact Ms. Stephanie Roberts at (808) 768-6143 to schedule a meeting.

Very truly yours,

Wayne Y. Yoshioka  
Director

Enclosures:

Archaeological Resources Technical Report  
Cultural Resources Technical Report  
CD containing Archaeological Resources,  
Cultural Resources, and Historic  
Resources Technical Reports

cc: Ms. Pua Aiu, State Historic Preservation Division  
Advisory Council on Historic Preservation  
- Ms. Blythe Semmer  
- Ms. Kelly Yasaitis Fanizzo, Historic Preservation Specialist  
U.S. Department of the Interior, National Park Service  
- Mr. Frank Hays, Director, Pacific West Region-Honolulu  
- Dr. Elaine Jackson-Retondo, Architectural Historian, Architectural Resources  
Team  
National Trust for Historic Preservation  
- Ms. Elizabeth S. Merritt, Deputy General Counsel, Law Department  
- Ms. Anthea Hartig, Director  
- Mr. Anthony Veerkamp, Senior Program Officer  
Historic Hawaii Foundation  
- Ms. Kiersten Faulkner, Executive Director

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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 788-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 25, 2008

RT8/08-276186

The Honorable Laura Thielen, Chairperson  
Department of Land and Natural Resources  
State Historic Preservation Division  
Kakuhihewa Building, Room 555  
601 Kamokila Boulevard  
Kapolei, Hawaii 96707

Attention: Ms. Pua Aiu, SHPD Administrator

Dear Ms. Thielen:

Subject: Honolulu High-Capacity Transit Corridor Project

The City and County of Honolulu Department of Transportation Services (DTS), in cooperation with the U.S. Department of Transportation Federal Transit Administration (FTA), is evaluating the impacts of a high-capacity transit system on O'ahu. The project study area is the travel corridor between Kapolei and the University of Hawai'i at Mānoa (UH Mānoa).

Enclosed for your review and concurrence, please find the Determinations of Eligibility for the Honolulu High-Capacity Transit Corridor Project. These determinations were completed in accordance with Section 106 of the National Historic Preservation Act of 1966 (as amended) and the State of Hawai'i Revised Statutes (HRS), Chapter 6E, which addresses projects funded or permitted by state or county agencies. Thirteen consulting parties were invited to participate in the Section 106 process and to assist in the identification of historic built resources. The enclosed eligibility determinations cover the portion of the study corridor between East Kapolei and Ala Moana Center, which would be affected by the Project currently under development.

In order to fulfill the letter and spirit of the Section 106 process, DTS in consultation with the State Historic Preservation Division, established an Area of Potential Effects (APE) that included all properties one tax map lot deep flanking the proposed project corridor. Architectural historians assessed these parcels for the presence of resources that were previously listed in or determined eligible for listing in the National Register of Historic Places. Remaining resources that were constructed before 1969 were also identified and evaluated for eligibility for listing in the National Register. A range of resource types was encountered and included residential, commercial, military, and sacred architecture and historic landscape features. Resources were evaluated on forms that include photographs, brief architectural descriptions, and significance and integrity evaluations. In all, 626 resources or potential districts constructed before 1969 were newly identified, and DTS is recommending that 79 are eligible for listing in the National Register.

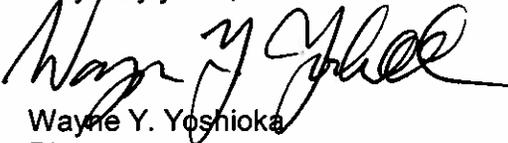
The Honorable Laura Thielen, Chairperson  
Page 2  
August 25, 2008

Please direct any formal written comments to:

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

If you would like project staff to provide an update, please contact Ms. Stephanie Roberts at (808) 768-6143 to schedule a meeting.

Very truly yours,



Wayne Y. Yoshioka  
Director

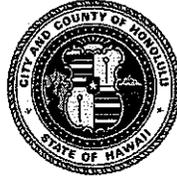
Enclosures

- cc: Ms. Astrid Liverman, Acting Architectural Branch Chief  
Mr. Raymond Sukys, Federal Transit Administration, Region IX  
U.S. Department of the Interior, National Park Service
- Mr. Frank Hays, Director, Pacific West Region-Honolulu
  - Dr. Elaine Jackson-Retondo, Architectural Historian,  
Architectural Resources Team  
National Trust for Historic Preservation
  - Ms. Elizabeth S. Merritt, Deputy General Counsel
  - Ms. Anthea Hartig, Director and Mr. Anthony Veerkamp,  
Senior Program Officer  
Historic Hawaii Foundation
  - Ms. Kiersten Faulkner, Executive Director  
Advisory Council on Historic Preservation
  - Ms. Kelly Yasaitis Fanizzo, Historic Preservation Specialist

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

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Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

September 26, 2008

RT9/08-280990

Honorable Laura H. Thielen  
State Historic Preservation Officer and Chairperson  
Department of Land and Natural Resources  
Kakuhihewa Building, Room 555  
601 Kamokila Boulevard  
Kapolei, Hawaii 96707

Attention: Dr. Pua Aiu, Administrator  
State Historic Preservation Division

Dear Ms. Thielen:

Subject: Merger of the NEPA and Section 106 Process  
Honolulu High-Capacity Transit Corridor Project

This is to provide the notification required by 36 CFR 800.8 (c) that the City and County of Honolulu Department of Transportation Services (DTS) intends to use the National Environmental Policy Act (NEPA) process and documentation for the Honolulu High-Capacity Transit Corridor Project to comply with the requirements of Section 106 of the National Historic Preservation Act (Section 106).

We have been coordinating with the staff of the State Historic Preservation Division (SHPD) regarding the project and have discussed our intention to use the NEPA process and documentation to comply with Section 106. We appreciate the attention and efforts of SHPD staff on the project and look forward to continuing to work together.

Honorable Laura H. Thielen  
Page 2  
September 29, 2008

Should you have any questions regarding this matter, please contact Ms. Faith Miyamoto of the Rapid Transit Division at 768-8350.

Very truly yours,

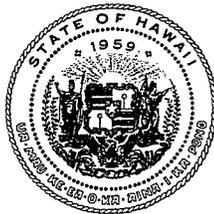
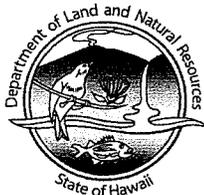


WAYNE Y. YOSHIOKA  
Director

cc: Dr. Astrid Liverman, Acting Architectural Branch Chief  
State Historic Preservation Division  
Mr. Leslie Rogers, Region IX Administrator, FTA  
U.S. Department of the Interior, National Park Service  
Mr. Frank Hays, Director, Pacific West Region-Honolulu  
Dr. Elaine Jackson-Retondo, Architectural Historian, Architectural Resources Team  
Specific Great Basin Support Office  
National Trust for Historic Preservation  
Ms. Elizabeth S. Merritt, Deputy General Counsel  
Ms. Anthea Hartig, Director, and Mr. Anthony Veerkamp, Senior Program Officer  
Historic Hawaii Foundation  
Ms. Kiersten Faulkner, Executive Director  
Advisory Council on Historic Preservation  
Ms. Blythe Semmer and Kelly Yasaitis Fanizzo, Historic Preservation Specialist,  
Office of Federal Agency Programs

dc (F. Miyamoto)

LINDA LINGLE  
GOVERNOR OF HAWAII



**STATE OF HAWAII**  
**DEPARTMENT OF LAND AND NATURAL RESOURCES**

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

LAURA H. THIELEN  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT

RUSSELL Y. TSUJI  
FIRST DEPUTY

KEN C. KAWAHARA  
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AQUATIC RESOURCES  
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HISTORIC PRESERVATION  
KAHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

September 26, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

**LOG NO: 2008.3762**  
**DOC NO: 0809AL44**  
**Architecture**

Dear Mr. Yoshioka:

**SUBJECT: Section 106 (NHPA) Consultation**  
**Honolulu High-Capacity Transit Corridor**  
**Purpose and Need for the Project and Alternatives Chapters, Draft**  
**Environmental Impact Statement**  
**Technical Report: Historic Resources**  
**Island of O'ahu**  
**TMK: (1) (various)**

This is in response to your transmittal, dated August 18 and received in our office on August 22, 2008. Thank you for providing the opportunity to comment on the draft Historic Resources Technical Report, dated August 1, as well as confidential, intergovernmental advance portions of the draft Environmental Impact Statement. Our office requested to postpone our response until after our September 19 project update and coordination meeting with staff from Parsons Brinckerhoff, Mason Architects Inc., and other stakeholders. This slight delay enables us to incorporate useful information from that meeting into our response.

The proposed project covers the fundable twenty-mile segment of the corridor between East Kapolei and the Ala Moana Center with alternatives for both Fixed Guideway Transit Alternatives of the Salt Lake and Airport routes. Complete analysis of the historic resources and determination of effect for the University of Hawaii, West Kapolei, and Waikiki spurs have not been fully addressed in the documentation, as those portions of the project are not yet funded and will be subject to additional consultation at a future time. Consultation between the Federal Transit Administration, State Historic Preservation Officer, and other consulting and concurring parties will result in a Memorandum of Agreement regarding the proposed undertaking's impact to architectural resources.

The State Historic Preservation Division (SHPD) has several comments that it would like to offer for consideration at this time:

Table S-1: Summary of Identification, Evaluation, and Effects—Historic Resources (p. S-2) presents the findings of the number of State or National Register of Historic Places listed, known eligible, or evaluated eligible resources, numbering in total 119 if both the Salt Lake and Airport segments are completed. However, the summary only indicates a total of six resources for which the FTA proposes a determination of adverse effect due to demolition. The SHPD does not concur with this preliminary determination that adverse effects for this project are limited to those six resources. The Historic Hawai'i Foundation expressed the same concern in their letter of September 15, specifically regarding

construction passing over historic bridges, indirect impacts, and individual listed resources and districts. Examples of indirect impacts would include those to landscapes such as the Sumida Watercress Farm and 'Aiea Plantation Cemetery, and to individual resources such as the PetsWell Animal Hospital designed by locally renowned architect Vladimir Ossipoff.

However, our discussion indicated that the Federal Transit Administration has not yet completed its review for effect determinations pending our office's response to individual eligibility determinations. In a separate transmittal shortly forthcoming, the SHPD will comment in more detail regarding the findings of the technical report in relation to the eligibility determinations submitted for individual resources. We appreciate the amount of substantive research that characterizes the submitted documentation.

Furthermore, we were encouraged that at our meeting it was indicated that indirect impacts to landscape and setting, including viewsheds *makai to mauka*, will be examined to determine the broader impact of the corridor itself. We believe that this macroscopic dimension will aid in accurately reflecting the comprehensive effect of the proposed project and in turn facilitate identification of appropriate mitigation.

·Based on new information emerging regarding resources in the vicinity of former Marine Corps Air Station 'Ewa Field, additional consideration should be given to resources, if any, in the area of potential effect associated with the December 7, 1941 attack. Please further qualify the description of MCAS 'Ewa (p. 4-2), for which a few resources remain extant (p. 4-8). Ongoing consultation with the Navy regarding the transfer of parcels in this area to a private developer has recently revealed the necessity for more thorough investigation as to the status and eligibility of these resources. This includes the MCAS 'Ewa runways (p. 4-10), which should be evaluated in accordance with the National Park Service bulletin, *Guidelines for Identifying, Evaluating, and Registering America's Historic Battlefields*.

·In response to the description of proposed station characteristics and potential siting (pp. 2-19-31), the SHPD suggests in the next few months, as more information comes available, engaging in a site visit to better visualize scale and setting at these locations. We are also interested in additional information regarding the dimensions and materials of the stations and how stations will be individualized to harmonize with the local character of a neighborhood or site. Staff from Parsons Brinckerhoff has very helpfully provided CADD renderings of the corridor at locations including the Nu'uuanu Stream Bridge, and we would be interested in similar visuals for the proposed stations.

Regarding the image (fig. 2-41) depicting the installation of a traction power substation, we would like to inquire as to whether there will be an effort to provide a design component to these mechanical features/support facilities so that they better harmonize with the local character of their setting.

·Please clarify as to whether the Advisory Council on Historic Preservation is formally participating in this consultation. It is also our understanding that the National Trust for Historic Preservation and Hawaii's Thousand Friends have expressed interest in participating in consultation. As such, they should be included in the list figured on pp. 2-4-5.

·Due to the stated importance (p. 2-4) of the Chinatown National Register district's historic connection with the waterfront, we believe that the placement of the transit corridor will result in an adverse effect on that district, although planners have made distinct efforts to minimize that harm. As a result, the updating of the Chinatown NRHP nomination would constitute appropriate mitigation.

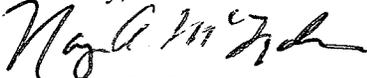
Regarding mitigation, the SHPD strongly supports the suggestions offered by the Historic Hawai'i Foundation as proportional to the direct, indirect, and cumulative impacts of the corridor. These include: public access to documentation; National Register updates and nominations; City and County of Honolulu certified local government designation; Main Street program development; restoration of historic Irwin Park; and context sensitive design solutions. In compliment, the SHPD would like to add, in terms of public access to documentation, that digitization of our office's O'ahu Island inventory would contribute to the National Conference of State Historic Preservation Officers' ongoing effort to promote a comprehensive, nationwide historic resources inventory. Additionally, if historic as well as contemporary Sanborn Fire Insurance maps could be provided to our office, it would enhance the SHPD's future ability to accurately review projects on O'ahu as well as contribute to the availability of this type of documentation to the public.

The draft Technical Report also offers suggestion of forms of mitigation, including Historic American Building Survey documentation. The statement on p. 6-2, however, should be clarified: "All of this documentation would be provided to SHPD, who would have a role in coordinating and completing this effort." While our office would act as a repository for mitigation documentation, due to understaffing, we would not be able to take an active role in completing any documentation. Other suggestions include interpretive signage, cultural landscape reports, historic context reports, and multiple property NRHP submissions. Our office appreciates all of these suggestions, which along with those offered by Historic Hawai'i Foundation, should be actively considered as consultation continues. Regarding cultural landscape reports, it would be appropriate, given the overall adverse effect of the project (p. 5-9), to complete a report that extends the length of the corridor.

To confirm from our meeting, the final EIS will include the list of properties proposed to be acquired or demolished as well as identify the preferred alternative regarding the Salt Lake Boulevard and Airport routes. This information will aid in ongoing discussion regarding mitigation commitments.

Thank you for the opportunity to comment. Comments from our Archaeology and History and Culture branches will be sent under separate cover. Should you have any additional questions or concerns, please do not hesitate to contact Dr. Astrid Liverman in our O'ahu office at (808) 692-8015.

Sincerely,



Nancy A. McMahon  
Deputy State Historic Preservation Officer

AMBL:

c:

Laura H. Thielen, State Historic Preservation Officer and Chairperson, Department of Land and Natural Resources [email]

U.S. Department of the Interior, National Park Service

Frank Hays, Director, Pacific West Region-Honolulu [email]

Dr. Elaine Jackson-Retondo, Architectural Historian, Pacific West Region [email]

National Trust for Historic Preservation

Brian R. Turner, Law Fellow, Western Office [email]

Elizabeth S. Merritt, Deputy General Counsel, Law Department [email]

Historic Hawaii Foundation, Kiersten Faulkner, Executive Director [email]

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
Page 4 of 4

**LOG NO: 2008.3762**  
**DOC NO: 0809AL44**

Advisory Council on Historic Preservation, Katry Harris, Historic Preservation Specialist,  
Office of Federal Agency Programs, 1100 Pennsylvania Avenue N.W., Suite 809,  
Washington, D.C. 20004

Office of Hawaiian Affairs Honolulu, 711 Kapi'olani Boulevard, Suite 500, Honolulu, Hawai'i  
96813

Dee Ruzicka and Wendy Wichman, Mason Architects Inc. [email]

Lawrence Spurgeon, Supervising Environmental Engineer, Parsons Brinckerhoff [email]

LINDA LINGLE  
GOVERNOR OF HAWAII



**STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES**

POST OFFICE BOX 621  
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LAURA H. THIELEN  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT

RUSSELL Y. TSUJI  
FIRST DEPUTY

KEN C. KAWAHARA  
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CONSERVATION AND COASTAL LANDS  
CONSERVATION AND RESOURCES ENFORCEMENT  
ENGINEERING

FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
KAHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

October 3, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

**LOG NO: 2008.3917  
DOC NO: 0810AL02  
Architecture**

Dear Mr. Yoshioka:

**SUBJECT: Section 106 (NHPA) Consultation  
Honolulu High-Capacity Transit Corridor  
Eligibility Determinations  
Island of O'ahu  
TMK: (1) (various)**

This is in response to your transmittal, dated August 25 and received in our office on September 2, 2008. The submitted determinations of eligibility for structures along the proposed Honolulu High-Capacity Transit Corridor include all properties one tax map lot deep flanking the corridor. Professional architectural historians (Mason Architects Inc.) assessed all resources constructed before 1969, including residential, industrial, commercial, military, and sacred resources as well as historic landscape features. Inventory forms provided photographs, brief architectural descriptions and significance and integrity evaluations. A total of 626 resources were identified and 79 presented as listed on or eligible for listing on the National Register of Historic Places in accordance with the National Park Service criteria. We appreciate the amount of substantive research that characterizes the submitted documentation.

Determinations pertain to the fundable twenty-mile segment of the corridor between East Kapolei and the Ala Moana Center with alternatives for both Fixed Guideway Transit Alternatives of the Salt Lake and Airport routes. Complete analysis of the historic resources and determination of effect for the University of Hawaii, West Kapolei, and Waikiki spurs have not been fully addressed in the documentation, as those portions of the project are not yet funded and will be subject to additional consultation at a future time.

The State Historic Preservation Division (SHPD) generally concurs with the determinations provided, although we have some concerns regarding the potential eligibility of some additional properties. Following our September 19 meeting with project coordinators, we did have the opportunity to discuss our preliminary review of the eligibility documentation with staff of Mason Architects, who were subsequently extremely helpful in providing additional photographs of specific properties.

At this time and based on those photographs, we would like suggest that the following additional properties be considered potentially eligible as good examples of representative local building typologies; rural landscape, vernacular structure, and pre-stress engineering accomplishment respectively:

·Waipahu-'Aiea Segment

94-526 Farrington Highway (1956)—Ishira House

94-143 Pupukahi Street (1965)—Terahira Apartments

94-1031 Kahuamoku Street (1965)—Carvalho Apartments  
94-965 Awane Street (1956)—Ohara Apartments  
94-1066 Awaiki Place (1959)—Sandobal House  
96-121 Waiawa Road—Watercress of Hawaii  
96-135 Kamehameha Highway (1937)—Solmirin House

Kalihi-Ala Moana Segment

1441 Kapiolani Boulevard (1959)—Ala Moana Building

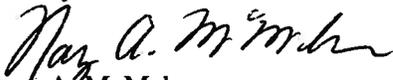
Some buildings we would appreciate further photographed for our state historic resource inventory are:

606 Coral (1963)  
975 Queen Street (1941)—Tropical Lampshade  
1209 Kona Street (1943)—Honolulu Hardwoods

Finally, based on new information emerging regarding resources in the vicinity of former Marine Corps Air Station 'Ewa Field, additional consideration should be given to resources, if any, in the area of potential effect associated with the December 7, 1941 attack. Please further qualify the description of MCAS 'Ewa (p. 4-2), for which a few resources remain extant (p. 4-8). Ongoing consultation with the Navy regarding the transfer of parcels in this area to a private developer has recently revealed the necessity for more thorough investigation as to the status and eligibility of these resources. This includes the MCAS 'Ewa runways (p. 4-10), which should be evaluated in accordance with the National Park Service bulletin, *Guidelines for Identifying, Evaluating, and Registering America's Historic Battlefields*.

Thank you for the opportunity to comment. Should you have any additional questions or concerns, please do not hesitate to contact Dr. Astrid Liverman in our O'ahu office at (808) 692-8015.

Sincerely,



Nancy A. McMahon  
Deputy State Historic Preservation Officer

AMBL:

c:

Laura H. Thielen, State Historic Preservation Officer and Chairperson, Department of Land and Natural Resources [email]  
U.S. Department of the Interior, National Park Service  
Frank Hays, Director, Pacific West Region-Honolulu [email]  
Dr. Elaine Jackson-Retondo, Architectural Historian, Pacific West Region [email]  
National Trust for Historic Preservation  
Brian R. Turner, Law Fellow, Western Office [email]  
Elizabeth S. Merritt, Deputy General Counsel, Law Department [email]  
Historic Hawaii Foundation, Kiersten Faulkner, Executive Director [email]  
Advisory Council on Historic Preservation, Katty Harris, Historic Preservation Specialist,  
Office of Federal Agency Programs, 1100 Pennsylvania Avenue N.W., Suite 809,  
Washington, D.C. 20004  
Office of Hawaiian Affairs Honolulu, 711 Kapi'olani Boulevard, Suite 500, Honolulu, Hawai'i  
96813  
Dee Ruzicka and Wendy Wichman, Mason Architects Inc. [email]  
Lawrence Spurgeon, Supervising Environmental Engineer, Parsons Brinckerhoff [email]

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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

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**FILE COPY**  
**DEC - 7 2007**

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

December 5, 2007

TPD07-00460

Commanding Officer Taylor W. Skardon  
Naval Station Pearl Harbor  
850 Ticonderoga, Suite 100  
Pearl Harbor, Hawaii 96860-5102

Attention: CDR Mike Zucchero  
NAVSTA Pearl Harbor Public Works Officer

Dear Commander Skardon:

Subject: Section 106 Coordination for the Honolulu High-Capacity Transit  
Corridor Project

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

The DTS, in cooperation with FTA, is preparing an Environmental Impact Statement (EIS) to evaluate alternatives that would provide high-capacity transit service on O'ahu. The project study area is the travel corridor between Kapolei and the University of Hawai'i at Mānoa and Waikīkī. This corridor includes the majority of housing and employment on O'ahu. A map of the transit corridor is enclosed. Scoping for the EIS was completed in two phases: Chapter 343, Hawaii Revised Statutes scoping was completed in December 2005 and scoping for the National Environmental Policy Act (NEPA) was completed in April 2007.

The DTS invites your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project. Project staff is available to brief your organization about the project. If you accept this invitation, staff soon will be contacting you regarding identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources.

Commanding Officer Taylor W. Skardon  
December 5, 2007  
Page 2

Project staff is also in the process of contacting other parties regarding the Section 106 consultation process and would appreciate any suggestions from your office of additional parties to be consulted.

Should you have any questions regarding this matter, please contact Mr. Toru Hamayasu, Project Manager, at 768-8344.

Very truly yours,

  
WAYNE Y. YOSHIOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

dc (F. Miyamoto)





## **Bryant, Clara YN1 NAVSTA Pearl Harbor, N1**

---

**From:** Hill, Lawrence D CDR NAVSTA Pearl Harbor, N00  
**Sent:** Tuesday, January 08, 2008 2:38 PM  
**To:** Bryant, Clara YN1 NAVSTA Pearl Harbor, N1  
**Subject:** FW: C&C Ltr RE: NHPA Section 106 Compliance

**Attachments:** C&C Honolulu DTS ltr on NHPA Section 106 Jan 08.doc



C&C Honolulu DTS  
ltr on NHPA S...

YN1/2,

Please format and put in routing for CO sign.

Thanks  
XO

-----Original Message-----

**From:** Zuccherro, Michael J CDR NAVFAC HI, PRP  
**Sent:** Tuesday, January 08, 2008 13:12  
**To:** Bracy, Brian E YNC CNI  
**Cc:** Hill, Lawrence D CDR NAVSTA Pearl Harbor, N00  
**Subject:** C&C Ltr RE: NHPA Section 106 Compliance

Chief:

Not sure how to do this, so I'm coming to you. I need to get this prepared for Skipper's signature. His is aware of it. I need a copy of the final signed letter also.

R,  
MJZ

Michael J. Zuccherro, P.E.  
CDR, CEC, USN  
Public Works Officer, Pearl Harbor  
NAVFAC Hawaii  
808-471-2647 (office)  
808-349-9704 (cell)



DEPARTMENT OF THE NAVY

COMMANDING OFFICER  
NAVAL STATION  
850 TICONDEROGA ST STE 100  
PEARL HARBOR HI 96860-5102

R71/08-246770

5750  
Ser N00060  
23 Jan 08

Mr. Toru Hamayasu  
Project Manager, High-Capacity Transit  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, HI 96813

Dear Mr. Hamayasu:

In response to Mr. Wayne Yoshioka's letter dated December 5, 2007 Naval Station Pearl Harbor accepts the City's offer to be a consulting party in the National Historic Preservation Act Section 106 process. We look forward to the opportunity to provide assistance in this endeavor.

My point of contact remains CDR Mike Zuccherro, Naval Station Pearl Harbor Public Works Officer. He can be reached at (808)471-2647 and e-mailed at [michael.zuccherro@navy.mil](mailto:michael.zuccherro@navy.mil).

Sincerely,

TAYLOR W. SKARDON  
Commanding Officer

08 JAN 30 P5:11  
DTS  
RAPID TRANSIT

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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 25, 2008

RT8/08-276162

Commanding Officer Taylor W. Skardon  
Naval Station  
850 Ticonderoga Street, Suite 100  
Pearl Harbor, Hawaii 96860-5102

Attention: Commander Mike Zuchero  
NAVSTA Pearl Harbor Public Works Officer

Dear Commanding Officer Skardon:

Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu, Department of Transportation Services (DTS), seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

DTS previously invited your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project in a letter dated December 5, 2007. DTS is expected to issue the Draft Environmental Impact Statement for the project in Fall 2008.

As part of the Section 106 process, DTS would like to seek your input regarding concerns and questions about the project including identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize, or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources. Enclosed is one (1) hard copy of the Historical Resources Technical Report along with one (1) CD containing the Archaeological Resources, Cultural Resources, and Historical Resources Technical Reports.

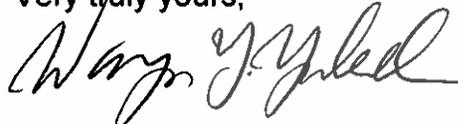
Commanding Officer Taylor W. Skardon  
Page 2  
August 25, 2008

Any formal written comments are requested by September 17, 2008, and should be addressed to:

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Project staff is also available to brief your organization about the project if requested. Should you have any questions regarding this matter, please contact Ms. Stephanie Roberts at 768-6143.

Very truly yours,



Wayne Y. Yoshioka  
Director

**Enclosures:**

Historical Resources Technical Report  
CD containing PDF of Archaeological Resources,  
Cultural Resources, and Historical Resources  
Technical Reports



Polly Cosson  
Mason Architects  
119 Merchant Street, Suite 501  
Honolulu, HI 96813

## 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.

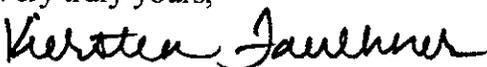
If the Honolulu High-Capacity Transit Corridor Project management team is determined to follow this ill-advised process, then the elements of that process have an increased duty to be thorough. While the methodology outlined for the historic resources inventory could be acceptable for a baseline survey, 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

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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

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**FILE COPY**  
DEC - 7 2007

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

December 5, 2007

TPD07-00455

Ms. Kiersten Faulkner, Executive Director  
Historic Hawaii Foundation  
Dole Office Building Tower, Suite 690  
The Dole Cannery, 680 Iwilei Road  
Honolulu, Hawaii 96817

Dear Ms. Faulkner:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

The DTS, in cooperation with FTA, is preparing an Environmental Impact Statement (EIS) to evaluate alternatives that would provide high-capacity transit service on O'ahu. The project study area is the travel corridor between Kapolei and the University of Hawai'i at Mānoa and Waikīkī. This corridor includes the majority of housing and employment on O'ahu. A map of the transit corridor is enclosed. Scoping for the EIS was completed in two phases: Chapter 343, Hawaii Revised Statutes scoping was completed in December 2005 and scoping for the National Environmental Policy Act (NEPA) was completed in April 2007.

The DTS invites your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project. Project staff is available to brief your organization about the project. If you accept this invitation, staff soon will be contacting you regarding identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources.

Ms. Kiersten Faulkner, Executive Director  
December 5, 2007  
Page 2

Project staff is also in the process of contacting other parties regarding the Section 106 consultation process and would appreciate any suggestions from your office of additional parties to be consulted.

Should you have any questions regarding this matter, please contact Mr. Toru Hamayasu, Project Manager, at 768-8344.

Very truly yours,

  
WAYNE Y. YOSHITOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

dc (F. Miyamoto)



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

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HONOLULU, HAWAII 96813  
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MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 25, 2008

RT8/08-276160

Ms. Kiersten Faulkner, Executive Director  
Historic Hawaii Foundation  
680 Iwilei Road  
Dole Office Building Tower, Suite 690  
Honolulu, Hawaii 96817

Dear Ms. Faulkner:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu, Department of Transportation Services (DTS), seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

DTS previously invited your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project in a letter dated December 5, 2007. DTS is expected to issue the Draft Environmental Impact Statement for the project in Fall 2008.

Although we heard many of your concerns during a meeting between you and project staff on June 18, 2008, as part of the Section 106 process, DTS would like to seek any additional input regarding concerns and questions about the project including identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize, or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources. Enclosed is one (1) printed copy of the Historical Resources Technical Report along with one (1) CD containing the Archaeological Resources, Cultural Resources, and Historical Resources Technical Reports.

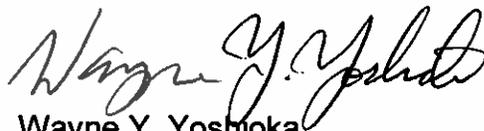
Ms. Kierstan Faulkner, Executive Director  
Page 2  
August 25, 2008

Any formal written comments are requested by September 17, 2008, and should be addressed to:

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, HI 96813

Project staff is also available to brief your organization about the project if requested. Should you have any questions regarding this matter, please contact Ms. Stephanie Roberts at 768-6143.

Very truly yours,



Wayne Y. Yoshioka  
Director

**Enclosures:**

Historical Resources Technical Report  
CD containing PDF of Archaeological Resources,  
Cultural Resources, and Historical Resources  
Technical Reports

# HISTORIC HAWAII FOUNDATION

R79/08-279349

September 15, 2008

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

**RE: Section 106 Consultation for the Honolulu High-Capacity Transit Corridor Project & Review of Historic Resources Technical Report**

Dear Mr. Yoshioka:

Thank you for referring the above-mentioned project to Historic Hawai'i Foundation for consultation under Section 106 of National Historic Preservation Act. We also look forward to seeing the Draft Environmental Impact Statement and reviewing it for additional information about potential historic, cultural, archeological, visual and environmental effects from the project.

Interests of Historic Hawai'i Foundation

Since 1974, Historic Hawai'i Foundation (HHF) has been a statewide leader for historic preservation. HHF's mission is to preserve and encourage the preservation of Hawaii's historic buildings, places, objects and communities. HHF's interest in this undertaking is in assisting the project team to avoid, minimize and mitigate effects to historic properties from the Transit Corridor Project.

Methodology

HHF recognizes the immense scope of this undertaking and the extensive research that has been done. We concur with the methodology that was used and appreciate the succinct and concise presentation of findings and recommendations. We also concur with the phased approach of first determining the Area of Potential Effect (APE), followed by the determination of eligibility, the assessment of effects, and finally the package of mitigation measures. We anticipate being a consulting and concurring party to the Memorandum of Agreement that will memorialize the final agreements.

Determination of National Register Eligibility

The overview of historic resources and the determination of National Register eligibility for each parcel appear to be substantive and accurate. HHF has not conducted independent research or evaluation of the sites and will defer to State Historic Preservation Division (SHPD) for concurrence or challenge to the determination of eligibility.

Page 1 of 5



### Assessment of Effects

Historic Hawai'i Foundation has concerns regarding the determination of effect for properties along the planned transit route. The Historical Resources Technical Report states that: as described in 36CFR 800.16(i), "effect means alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register." Alteration of a property's historic characteristics includes changes that affect any of the seven aspects of historic integrity. These are feeling, association, workmanship, design, setting, location and materials. The technical report accurately notes that 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's standards for the treatment of historic properties (36 CFR 68) and applicable guidelines;
- 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 features; or
- Neglect of a property that causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance.

We are concerned that contrary to this definition of adverse effect, the technical report states that there is no effect at all to a number of historic bridges when the guideway passes over them. The presence of the guideway over the historic bridges introduces visual, atmospheric, and audible elements that diminish their historic integrity, most notably their setting, feeling, and association. We feel strongly that these impacts should be acknowledged and appropriate mitigation commitments should be proposed.

Likewise, it is inappropriate that a "no adverse effect" determination is proposed for numerous structures, for which there is "no direct impact to the parcel." Again, it is possible for an indirect impact, such as the visual, atmospheric and audible, to constitute an adverse effect to historic properties.

The technical report identifies only six adverse effects to historic resources. HHHF disagrees with this determination, as the adverse impacts to historic properties are much greater than just the direct impacts that are occurring in the six instances identified. We are particularly concerned about impacts to the Chinatown Historic District, the Pearl Harbor National Historic Landmark, the Nu'uuanu Bridge, and the Dillingham Transportation Building. We are also concerned about impacts from the future extensions to Kalaeloa, University and Waikiki. Although we recognize that those segments are not part of the current undertaking, they are reasonably foreseeable as a result of the project and system-wide decisions being determined at this stage.

Issues such as view planes, setting, and the feeling associated with a historic property must be taken into consideration to accurately assess the full impact of the project on historic structures, sites and objects. The visual impacts to historic properties extend beyond the impacts identified in this report. We recommend that these indirect impacts be addressed and appropriate mitigation be proposed.

In addition, the cumulative effect to the collective of historic resources is greater than the sum of impacts to individual parcels. The scale of the project is such that it will irreparably change both the rural and urban landscapes through which it passes. The overall effect on the entire corridor should be acknowledged.

### Mitigation Measures

HHF appreciates that care has been taken to avoid or minimize direct impacts to many historic properties, especially by using existing right of way and transportation corridors wherever possible. This allows for minimizing new land acquisition and subsequent direct impacts to historic properties, structures, trees and other sites. We also appreciate that site decisions for station areas and parking facilities have considered impacts to historic structures and adjustments have been made to avoid those impacts.

However, even with these modifications, the scale of the effect is immense. Mitigation measures need to be proportional to the impact and to take into account both the direct and cumulative effects on the corridor. The technical report notes several categories of potential mitigating actions and states that additional discussions and consultation will result in a full determination of mitigation.

HHF concurs with the general categories of mitigation outlined in the report, including documentation, seeking opportunities for historic and architectural interpretation, and cultural landscape reports. We also recommend that the mitigation consultation consider additional measures, such as:

1. Public access to documentation: The research into the history, architecture, events and patterns of development along the corridor is important information that could have multiple applications beyond the immediate project. This information, especially the site-specific inventory sheets, should be made available in an accessible form to other researchers. One possibility is to develop a web-based research platform with all the historic inventory information. It should be interactive, searchable, geo-coded and serve as the foundation for later additions from other research. Especially if combined with the State's inventory of all historic resources on O'ahu, this could be a powerful tool for historic preservation projects throughout the City & County. Joint hosting with the State Department of Land and Natural Resources or the State Office of Planning could be explored. Other potential partners could include the Office of Hawaiian Affairs and the Department of Defense, which also maintain inventories of historic resources.
2. National Register Nominations: The technical study has identified 76 parcels or districts that are eligible for designation on the National Register of Historic Places. Nominations for these resources should be prepared and submitted for formal designation. In addition, several

existing historic districts adjacent to the transit corridor, such as the Chinatown District and the Pearl Harbor National Historic Landmark, should have updates to the district nomination forms.

3. City & County of Honolulu Preservation Program: The City & County of Honolulu is the only local government in the state that lacks a comprehensive preservation program, including a preservation commission, integration with comprehensive land use planning and permitting, and review of impacts to historic buildings and sites. With the expected impacts not only from the transit project, but also from associated transit-oriented development, the City needs to be prepared to educate, evaluate and integrate preservation considerations into land use decisions. The National Historic Preservation Act and its implementing regulations through the National Park Service provide local governments with flexibility and local decision-making powers for addressing these issues through the Certified Local Government (CLG) Program. The City & County of Honolulu should establish a local preservation program consistent with the CLG requirements and apply for CLG designation, appoint a qualified preservation commission, staff the commission adequately, and provide for its on-going training and effective participation in land use matters.
4. Main Street Program: Main Street is a national program that works with local communities to achieve economic development goals through historic preservation, especially by means of rehabilitation of historic buildings, use of tax incentives and grant programs, public education programs, and marketing for heritage tourism. Hawai'i is one of only five states that lacks a Main Street coordinator and dedicated funding for Main Street programs. The City & County should support the re-establishment of the Main Street program, either by serving as the coordinator or cooperating with another coordinating agency, and providing dedicated funds for its successful implementation throughout the life of the transit project. In addition to the communities directly impacted by transit that could benefit from the Main Street program (Waipahu, 'Aiea, Kalihi, Chinatown, Mō'ili'ili), this program would also serve other O'ahu communities, such as Hale'iwa, Kahuku and Kailua.
5. Restoration of Historic Irwin Park: Irwin Park is a historic site between Aloha Tower and Ala Moana Boulevard. Despite being a dedicated park, it is being used as a parking lot for Aloha Tower Marketplace. Irwin Park should be restored as an urban green space, offering visual relief and passive recreation for the nearby station area.
6. Station Design and Context Sensitive Solutions: architectural and landscape designs for the stations and the guideway infrastructure should be responsive to and compatible with each area's history, culture and architectural context. Each segment should be differentiated and unique for increased compatibility with the local communities.

Additional mitigation opportunities may develop throughout the consultation process. We look forward to a full discussion about how to integrate the transit corridor into the existing settings and to mitigate the impacts to historic resources.

Thank you for the opportunity to comment. Please let me know if you have any questions or comments. We look forward to the next phase of review and consultation.

Very truly yours,



Kiersten Faulkner, AICP  
Executive Director

Copies via email:

Laura Thielen, State Historic Preservation Officer & Chair, DLNR  
Pua Aiu, Administrator, State Historic Preservation Division  
Astrid Liverman, Architectural Branch Chief, SHPD  
Elaine Jackson-Retondo, National Park Service  
Frank Hays, National Park Service  
Melia Lane-Kamahele, National Park Service  
Betsy Merritt, National Trust for Historic Preservation  
Brian Turner, National Trust for Historic Preservation  
Kelly Yasaitis Fanizzo, Advisory Council on Historic Preservation  
Blythe Semmer, Advisory Council on Historic Preservation  
Lawrence Spurgeon, Parson Brinckerhoff  
Ann Yoklavich, Mason Architects, Inc.  
Henry Eng, Department of Planning and Permitting

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DEPT. OF  
TRANSPORTATION SERVICES

08 SEP 16 A10 : 57

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

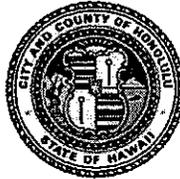
650 SOUTH KING STREET, 3RD FLOOR  
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Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

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**FILE COPY**

**DEC - 7 2007**

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

December 5, 2007

TPD07-00459

University of Hawaii Historic Preservation  
Certificate Program  
Department of American Studies  
University of Hawaii at Manoa  
1890 East-West Road, Moore Hall 324  
Honolulu, Hawaii 96822-4733

Gentlemen:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit  
Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

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The DTS invites your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project. Project staff is available to brief your organization about the project. If you accept this invitation, staff soon will be contacting you regarding identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources.

University of Hawaii Historic Preservation  
Certificate Program  
December 5, 2007  
Page 2

Project staff is also in the process of contacting other parties regarding the Section 106 consultation process and would appreciate any suggestions from your office of additional parties to be consulted.

Should you have any questions regarding this matter, please contact Mr. Toru Hamayasu, Project Manager, at 768-8344.

Very truly yours,



WAYNE Y. YOSHIOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

dc (F. Miyamoto)



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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 25, 2008

RT8/08-276163

University of Hawaii Historic Preservation  
Certificate Program  
University of Hawaii at Manoa  
1890 East-West Road, Moore Hall 324  
Honolulu, Hawaii 96822-4733

Dear Sir:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu, Department of Transportation Services (DTS), seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

DTS previously invited your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project in a letter dated December 5, 2007. DTS is expected to issue the Draft Environmental Impact Statement for the project in Fall 2008.

As part of the Section 106 process, DTS would like to seek your input regarding concerns and questions about the project including identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize, or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources. Enclosed is one (1) printed copy of the Historical Resources Technical Report along with one (1) CD containing the Archaeological Resources, Cultural Resources, and Historical Resources Technical Reports.

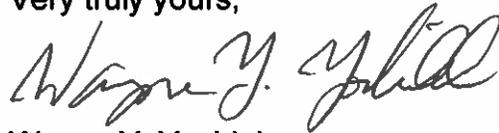
University of Hawaii Historic Preservation  
Certificate Program  
Page 2  
August 25, 2008

Any formal written comments are requested by September 17, 2008, and should be addressed to:

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Project staff is also available to brief your organization about the project if requested. Should you have any questions regarding this matter, please contact Ms. Stephanie Roberts at 768-6143.

Very truly yours,



Wayne Y. Yoshioka  
Director

**Enclosures:**

Historical Resources Technical Report  
CD containing PDF of Archaeological Resources,  
Cultural Resources, and Historical Resources  
Technical Reports

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

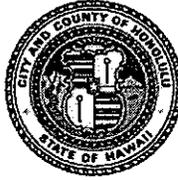
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**DEC - 7 2007**

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

December 5, 2007

TPD07-00453

AIA Honolulu  
119 Merchant Street  
Suite 402  
Honolulu, Hawaii 96813-4452

Gentlemen:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

The DTS, in cooperation with FTA, is preparing an Environmental Impact Statement (EIS) to evaluate alternatives that would provide high-capacity transit service on O'ahu. The project study area is the travel corridor between Kapolei and the University of Hawai'i at Mānoa and Waikīkī. This corridor includes the majority of housing and employment on O'ahu. A map of the transit corridor is enclosed. Scoping for the EIS was completed in two phases: Chapter 343, Hawaii Revised Statutes scoping was completed in December 2005 and scoping for the National Environmental Policy Act (NEPA) was completed in April 2007.

The DTS invites your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project. Project staff is available to brief your organization about the project. If you accept this invitation, staff soon will be contacting you regarding identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources.

AIA Honolulu  
December 5, 2007  
Page 2

Project staff is also in the process of contacting other parties regarding the Section 106 consultation process and would appreciate any suggestions from your office of additional parties to be consulted.

Should you have any questions regarding this matter, please contact Mr. Toru Hamayasu, Project Manager, at 768-8344.

Very truly yours,

  
WAYNE Y. YOSHIOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

dc (F. Miyamoto)

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

850 SOUTH KING STREET, 3RD FLOOR  
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MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 25, 2008

RT8/08-276158

American Institute of Architects  
The Honolulu Chapter  
119 Merchant Street  
Suite 402  
Honolulu, Hawaii 96813-4452

Dear Sir:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and the City and County of Honolulu, Department of Transportation Services (DTS), seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

DTS previously invited your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project in a letter dated December 5, 2007. DTS is expected to issue the Draft Environmental Impact Statement for the project in Fall 2008.

As part of the Section 106 process, DTS would like to seek your input regarding concerns and questions about the project including identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize, or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources. Enclosed is one (1) printed copy of the Historical Resources Technical Report along with one (1) CD containing the Archaeological Resources, Cultural Resources, and Historical Resources Technical Reports.

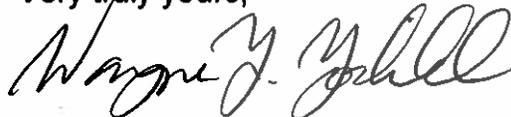
Any formal written comments are requested by September 17, 2008, and should be addressed to:

American Institute of Architects  
Page 2  
August 25, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Project staff is also available to brief your organization about the project if requested. Should you have any questions regarding this matter, please contact Ms. Stephanie Roberts at 768-6143.

Very truly yours,

A handwritten signature in black ink, appearing to read "Wayne Y. Yoshioka". The signature is fluid and cursive, written over a light blue horizontal line.

Wayne Y. Yoshioka  
Director

**Enclosures:**

Historical Resources Technical Report  
CD containing PDF of Archaeological Resources,  
Cultural Resources, and Historical Resources  
Technical Reports

# fax

strategy  
plumbing  
architecture  
interiors

## WATG

Date: September 17, 2008  
Fax #: 523-4730  
To: WAYNE YOSHIOKA, Department of Transportation Services  
From: SID CHAR  
Project: Section 106 Coordination for the Honolulu High Capacity Transit Project  
Project #: AIA  
# of Pages: 3

*If you do not receive all pages, please let us know.*

---

Aloha:

Attached is correspondence from Sidney Char directed to Wayne Yoshioka, Director of Department of Transportation Services.

Please deliver.

Many mahalos.

RECEIVED  
08 SEP 18 A 8 : 13  
DIRECTOR'S OFFICE  
DEPT. OF TRANSPORTATION SERVICES

WATG  
700 Bishop Street, Suite 1600  
Honolulu, Hawaii 96813 USA  
+1 (808) 521 8888 tel  
+1 (808) 521 3888 fax  
watg.com

RT 9/08-279820

# AIA Honolulu

A Chapter of The American Institute of Architects



17 September 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and county of Honolulu  
650 south King Street, 3<sup>rd</sup> floor  
Honolulu, Hawaii 96813

Dear Mr. Yoshioka,

RE: Section 106 Coordination for the Honolulu High Capacity Transit Corridor Project

On behalf of the American Institute of Architects (AIA), we thank you for the opportunity to review the Historic Resources Technical Report for the Honolulu High - Capacity Transit Corridor Project dated August 1, 2008. As architects, we are pleased that the City of Honolulu is taking positive measures in considering possible effects to historic buildings and sites along the transit corridor. The report covers a broad area of many structures along the entire proposed transit corridor and attempts to address areas of potential effect, as well as whether any adverse effects impact specific sites or structures.

We found that many of the sites are not listed on the National Register of Historic Places and the agreement on the eligibility has not been determined by the State Historic Preservation Division and therefore it may be premature to comment on these. More information and clarification on the potential effects to each site would be helpful for evaluations.

We did note that the report discussed the Local Historic Regulations and the City's Land Use Ordinance (LUO) providing special objectives for preserving historic significance and architectural characteristics listed for the Chinatown and Hawaii Capital Special Districts and this included the waterfront precinct around Aloha Tower. This reiterates the National Register nomination wording about the historic importance of the Chinatown connection to the waterfront and the LUO objective to "retain makai view corridors as a visual means of maintaining the historic link between Chinatown and the harbor". This is very consistent with some of the concerns of the AIA and we believe that the report's assessment of effects as "No Adverse effect" is not consistent with the aforementioned objectives.

AIA Honolulu  
119 Merchant Street, Suite 402  
Honolulu, Hawaii 96813-4452  
Phone 808 545 4242  
Fax: 808 545 4243  
Website: www.aiahonolulu.org

17 September 2008  
Mr. Wayne Yoshioka, Director  
Page 2

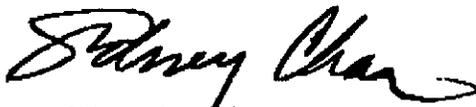
In addition, adverse effects as defined in the Section 106 regulations include the following: "Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance" and introduction of

visual, atmospheric or audible elements that diminish the integrity of the property's historic features". We believe that these criteria should be applied in the consideration of the elevated transit structure in close proximity to the Chinatown and Aloha Tower waterfront areas. The report does not address mitigation measures for these important historic areas as it did not consider there are adverse effects.

We also observed that the section on assessments of effects identified six historic properties with proposed adverse effects but the report did not provide much information on these properties nor sufficient photographic documentation for these areas. We believe that the report should relook at the issues related to the Chinatown and Waterfront area as the visual impacts may be contrary to the historic and City's LUO objectives.

We look forward to the comments by others to the subject report as well as further information on mitigation measures. We have circulated the report to other members of our AIA Transit Task Force for their information and comment. We are also interested in any effects as identified by the Draft EIS and any effects to the environment. Once again, we appreciate being included in the review of this design process for this extremely important project for the City of Honolulu.

Aloha!



Sidney Char AIA  
President

cc: Mayor Mufi Hanneman  
Wayne Hashiro  
Trudi Saito  
David Akinaka  
Amy Blagriff

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

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**DEC - 7 2007**

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

December 5, 2007

TPD07-00456

Mr. Teney K. Takahashi, Interim Executive Director  
Hawaii Community Development Authority  
677 Ala Moana Boulevard  
Suite 1001  
Honolulu, Hawaii 96813

Dear Mr. Takahashi:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

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Mr. Teney K. Takahashi, Interim Executive Director  
December 5, 2007  
Page 2

Project staff is also in the process of contacting other parties regarding the Section 106 consultation process and would appreciate any suggestions from your office of additional parties to be consulted.

Should you have any questions regarding this matter, please contact Mr. Toru Hamayasu, Project Manager, at 768-8344.

Very truly yours,

  
WAYNE V. YOSHITAKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

dc (F. Miyamoto)



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

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MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 25, 2008

RT8/08-276161

Mr. Anthony Ching, Executive Director  
Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawaii 96813

Attention: Mr. Deepak Neupane, P.E. AR

Dear Mr. Ching:

Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu, Department of Transportation Services (DTS), seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

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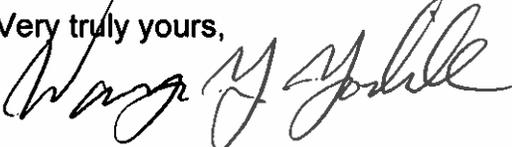
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Mr. Anthony Ching, Executive Director  
Page 2  
August 25, 2008

Any formal written comments are requested by September 17, 2008, and should be addressed to:

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Project staff is also available to brief your organization about the project if requested. Should you have any questions regarding this matter, please contact Ms. Stephanie Roberts at 768-6143.

Very truly yours,  


Wayne Y. Yoshioka  
Director

Enclosures:  
Historical Resources Technical Report  
CD containing PDF of Archaeological Resources,  
Cultural Resources, and Historical Resources  
Technical Reports

R79/08 - 279827



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



KAKAOKO  
KALAELOA

Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
Executive Director

677 Ala Moana Boulevard  
Suite 1001  
Honolulu, Hawaii  
96813

Telephone  
(808) 587-2870

Facsimile  
(808) 587-8150

E-Mail  
contact@hcdaweb.org

Web site  
www.hcdaweb.org

Ref. No.: PLTRANS 7.18

September 16, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Director's Office  
City of  
TRANSPORTATION SERVICES

08 SEP 18 AIO : 22

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Dear Mr. Yoshioka:

Re: Section 106 – Coordination for the Honolulu  
High-Capacity Transit Corridor Project

Thank you for the opportunity to review the documents relating to the Honolulu High-Capacity Transit Corridor Project. In particular, we have reviewed the proposal with respect to effects on historic, cultural, and archaeological resources.

We have the following comments to offer:

1. On page 5-21 of the Cultural Technical Report, reference was made to the "Queen Street Burial Mound" and the "Halekauwila Street Burial Mound." The location of these burial mounds within a Kakaako Community Development District ("KCDD") reference map would greatly enhance public and agency review.
2. Based on the potential of the project to impact pre-contact and post-contact archaeology and burials in the Kakaako District, we recommend:
  - (a) an Archaeological Inventory Survey is conducted along the proposed area of the Transit Corridor;
  - (b) a preservation plan for known historical and cultural resources is articulated; and
  - (c) a strategy is defined for coordinating the development of the Transit Corridor with the likely discoveries of iwi or other finds in the Transit Corridor Project area.

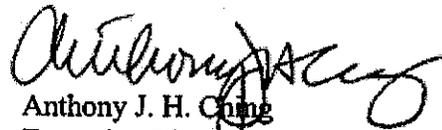
Mr. Wayne Yoshioka  
Page Two  
September 16, 2008

The City and County should work closely with the State Historic Preservation Division, the Office of Hawaiian Affairs, and Native Hawaiian community in developing and implementing these strategies, protocols and programs.

3. The Hawaii Community Development Authority ("HCDA") should be notified in writing of any burials or archaeological finds that may be unearthed due to the project.
4. We recommend that your department work with area landowners (General Growth Properties, Inc. and Kamehameha Schools) and the HCDA in finalizing the alignment of the Transit Corridor and station locations within the KCDD.

If there are any questions, please feel free to call me at 587-2870.

Sincerely,



Anthony J. H. Chung  
Executive Director

AJHC/DN/TM:ll

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

650 SOUTH KING STREET, 3RD FLOOR  
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**FILE COPY**

**DEC - 7 2007**

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

December 5, 2007

TPD07-00457

Mr. Clyde Namuo, Administrator  
Office of Hawaiian Affairs  
711 Kapi'olani Boulevard  
Suite 500  
Honolulu, Hawaii 96813

Dear Mr. Namuo:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

The DTS, in cooperation with FTA, is preparing an Environmental Impact Statement (EIS) to evaluate alternatives that would provide high-capacity transit service on O'ahu. The project study area is the travel corridor between Kapolei and the University of Hawai'i at Mānoa and Waikīkī. This corridor includes the majority of housing and employment on O'ahu. A map of the transit corridor is enclosed. Scoping for the EIS was completed in two phases: Chapter 343, Hawaii Revised Statutes scoping was completed in December 2005 and scoping for the National Environmental Policy Act (NEPA) was completed in April 2007.

The DTS invites your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project. Project staff is available to brief your organization about the project. If you accept this invitation, staff soon will be contacting you regarding identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources.

Mr. Clyde Namuo, Administrator  
December 5, 2007  
Page 2

Project staff is also in the process of contacting other parties regarding the Section 106 consultation process and would appreciate any suggestions from your office of additional parties to be consulted.

Should you have any questions regarding this matter, please contact Mr. Toru Hamayasu, Project Manager, at 768-8344.

Very truly yours,



WAYNE Y. YOSHIOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

dc (F. Miyamoto)





**STATE OF HAWAII**  
**OFFICE OF HAWAIIAN AFFAIRS**  
711 KAPI'OLANI BOULEVARD, SUITE 500  
HONOLULU, HAWAII 96813

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HRD 07/2156E

December 26, 2007

Wayne Y. Yoshioka, Acting Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street  
Honolulu, HI 96813

**RE: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Dear Mr. Wayne Yoshioka,

The Office of Hawaiian Affairs (OHA) is in receipt of your December 5, 2007 submission concerning Section 106 coordination for the Honolulu High-Capacity Transit Corridor Project and offers the following comments:

Our office appreciates the offer to be a consulting party as part of the Section 106 process. OHA recognizes that this will be an important process in order to preserve and protect any known and unknown historic properties that may coincide with the proposed rail alignment. We accept this invitation as a consulting party and look forward to any future consultations.

In regards to your request for other consulting parties in the Section 106 process, we recommend that you consult with Hui Mālama o Nā Kūpuna o Hawai'i Nei and the O'ahu Island Burial Council.

Thank you for the invitation to be a consulting party. If you have further questions or concerns, please contact Jason Jeremiah, Policy Advocate-Preservation, Native Rights, Land and Culture, at (808) 594-1816 or [jasonj@oha.org](mailto:jasonj@oha.org).

Aloha,

Clyde W. Nāmu'o  
Administrator

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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: [www.honolulu.gov](http://www.honolulu.gov)

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 18, 2008

RT8/08-274143

Mr. Clyde Nāmu`o  
Office of Hawaiian Affairs  
711 Kapi`olani Boulevard, Suite 500  
Honolulu, Hawaii 96813

Dear Mr. Nāmu`o:

**Subject: Honolulu High-Capacity Transit Corridor Project  
Participating Agency Project Update**

Thank you for agreeing to become involved in the environmental review process for the Honolulu High-Capacity Transit Corridor Project as a Participating Agency. Pursuant to stipulations in the National Environmental Policy Act (NEPA), Section 6002 of the *Safe, Accountable, Flexible, Efficient, Transportation Equity Act—A Legacy for Users* (SAFETEA-LU) guidance for federally funded projects, and Chapter 343 of the Hawaii Revised Statutes, and your participation as a Participating Agency with the Project, the City and County of Honolulu Department of Transportation Services (DTS) is providing internal and confidential intergovernmental copies of the Purpose and Need for the Project and Alternatives Chapters from the Draft Environmental Impact Statement and also pertinent Technical Reports for your review and comment. These Technical Reports include those regarding Historic Resources, Archaeological Resources, and Cultural Resources.

DTS also requests to formally present an update on the project. This briefing will provide an overall project update and will allow discussion of any specific questions and/or concerns about this project.

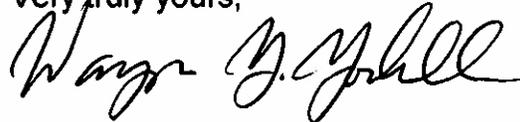
Any formal written comments are requested by September 17, 2008, and should be addressed to:

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Mr. Clyde Nāmu`o  
Page 2  
August 18, 2008

If you would like for project staff to provide an update, please contact Ms. Stephanie Roberts at (808) 768-6143 to schedule a meeting. We look forward to updating you about the project.

Very truly yours,

A handwritten signature in black ink, appearing to read "Wayne Y. Yoshioka". The signature is fluid and cursive, written over a white background.

WAYNE Y. YOSHIOKA  
Director

Enclosure:

CD containing the following:

Purpose and Need for the Project

Alternatives

Historic Resources Technical Memorandum

Archaeological Resources Technical Memorandum

Cultural Resources Technical Memorandum

R79/08-281302

PHONE (808) 594-1888

FAX (808) 594-1865



**STATE OF HAWAII**  
**OFFICE OF HAWAIIAN AFFAIRS**  
711 KAPI'OLANI BOULEVARD, SUITE 500  
HONOLULU, HAWAII 96813

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DIRECTOR'S OFFICE  
DEPT. OF  
TRANSPORTATION SERVICES

September 23, 2008

Wayne Y. Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawai'i 96813

**RE: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Aloha e Wayne Y. Yoshioka,

The Office of Hawaiian Affairs (OHA) is in receipt of the above-mentioned letter dated August 18, 2008. The Federal Transit Administration (FTA) and City and County of Honolulu, Department of Transportation Services (DTS) is seeking to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High Capacity Transit Corridor Project (Project). OHA has reviewed the project and offers the following comments.

The Project extends from Kapolei to UH Mānoa with future planned spurs in Waikīkī, UH Mānoa, and the Airport areas. In addition to the fixed guideway, the project will also include the construction of transit stations and supporting facilities. The supporting facilities include a vehicle maintenance facility, transit centers, park-and-ride lots, and traction power substations.

The mayor of the City and County of Honolulu has expressed a highly ambitious construction timetable for the Project. We realize that if environmental compliance takes a little longer than expected, the start of project construction must be pushed back until all necessary approvals are met. The proposed timetable of the Project is of great concern to our office. We request assurances that all environmental compliance requirements will be fulfilled before the start of construction.

Our office is also concerned about the level of anticipated archeological, cultural, and historic investigations that are planned to be conducted for the Project. After a review of Chapters 1 and 2 of the Draft Environmental Impact Statement (DEIS), the documentation states that the project study area will extend from Kapolei to UH Mānoa. The survey area of the archeological, cultural, and historic reports will only include the currently funded project area which stretches from East Kapolei to Ala Moana. This would not include the Airport, UH Mānoa and Waikīkī routes and spurs, which would therefore require additional environmental compliance to comply with Hawaii Revised Statutes (HRS) Chapter 343 and the National Historic Preservation Act of 1966 and its implementing regulations.

The Area of Potential Effect (APE) includes an approximate 300-foot-wide corridor centered on the project alignment. Included within the APE are the footprint of potential locations of project-related park-and-ride lots, maintenance facilities, and construction staging areas. According to the submission, confining the archeological resources within the APE to the limits of ground disturbance is warranted, because the surrounding built environment is largely developed and becoming progressively more urban as the Project progresses Koko Head.

As a result of the surrounding built environment of the Project, the submission states that the archeological resource identification efforts may include a phased identification process, which would be detailed in a Memorandum of Agreement (MOA). The approval of the Archeological Inventory Survey Plan (AIS), Archeological Monitoring Plan (AMP), and Burial Treatment Plan (BTP) should also be submitted to review by the SHPD before the commencement of each planned phase of the Project. The BTP should also be submitted to the O'ahu Island Burial Council (OIBC) for their approval.

Furthermore, the archeological technical report states that consultation with Native Hawaiian groups and organizations, including Hui Mālama, OHA, and the OIBC will be particularly important. OHA stresses that our office should not be the end-all for consultation with Native Hawaiian Organizations (NHOs). Consultation efforts must be conducted with each individual NHO that may have a special connection, expertise, or desire to provide input during the consultation process. OHA also stresses the importance of consulting with Native Hawaiian individuals and families that may have particular ties to areas within the APE of the project.

The OIBC has been actively involved in consultation with the DTS and its contractor Parsons Brinkerhoff (PB) concerning the Project. As early as October 2007, the DTS has discussed the project methodology with the OIBC. During recent OIBC meetings, the OIBC has expressed grave concerns with the methodology of the project and have actively asked for the exact details on how an MOA would be drafted for the Project. These concerns should be addressed by the DTS and its contractors of the Project.

OHA would defer to the OIBC on all decision-making authority that an MOA would entail. The OIBC has statutory obligations to protect iwi kūpuna and burial sites, pursuant to HRS Chapter 6E. OHA strongly advocates that the OIBC and OHA be included as invited

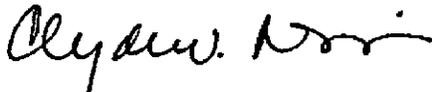
Wayne Y. Yoshioka, Director  
September 23, 2008  
Page 3

signatories to the MOA by the Federal Highways Administration, the lead federal agency on the project.

Finally, we request the applicant's assurances that should iwi kūpuna or Native Hawaiian cultural or traditional deposits be found during the construction of the project, work will cease, and the appropriate agencies will be contacted pursuant to applicable law.

Thank you for the opportunity to comment. If you have further questions, please contact Jason Jeremiah by phone at (808) 594-1816 or e-mail him at [jasonj@oha.org](mailto:jasonj@oha.org).

'O wau iho nō me ka 'oia'i'o,



Clyde W. Nāmu'o  
Administrator

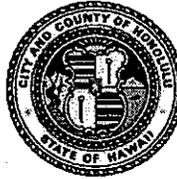
C: Laura Thielen  
State Historic Preservation Officer  
Department of Land and Natural Resources  
601 Kamokila Boulevard, Room 555  
Kapolei, Hawai'i 96707

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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

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**FILE COPY**  
**DEC - 7 2007**

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

December 5, 2007

TPD07-00458

Mr. Jace McQuivey, Chair  
Oahu Island Burial Council  
State Department of Land and Natural Resources  
State Historic Preservation Division  
601 Kamokila Boulevard, Suite 555  
Kapolei, Hawaii 96707

Dear Mr. McQuivey:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

The DTS, in cooperation with FTA, is preparing an Environmental Impact Statement (EIS) to evaluate alternatives that would provide high-capacity transit service on O'ahu. The project study area is the travel corridor between Kapolei and the University of Hawai'i at Mānoa and Waikīkī. This corridor includes the majority of housing and employment on O'ahu. A map of the transit corridor is enclosed. Scoping for the EIS was completed in two phases: Chapter 343, Hawaii Revised Statutes scoping was completed in December 2005 and scoping for the National Environmental Policy Act (NEPA) was completed in April 2007.

The DTS invites your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project. Project staff is available to brief your organization about the project. If you accept this invitation, staff soon will be contacting you regarding identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources.

Mr. Jace McQuivey, Chair  
December 5, 2007  
Page 2

Project staff is also in the process of contacting other parties regarding the Section 106 consultation process and would appreciate any suggestions from your office of additional parties to be consulted.

Should you have any questions regarding this matter, please contact Mr. Toru Hamayasu, Project Manager, at 768-8344.

Very truly yours,

  
WAYNE Y. YOSHIOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

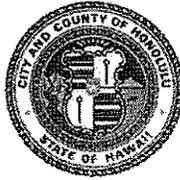
dc (F. Miyamoto)

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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 25, 2008

RT8/08-275904

Oahu Island Burial Council  
State Historic Preservation Division  
Department of Land and Natural Resources  
Kakuhihewa Building  
601 Kamokila Boulevard, Suite 555  
Kapolei, Hawaii 96707

Attention: Mr. Jace McQuivey

Dear Sir:

Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu, Department of Transportation Services (DTS), seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

DTS previously invited your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project in a letter dated December 5, 2007. DTS is expected to issue the Draft Environmental Impact Statement in Fall 2008. We appreciate your inviting us to provide information and to answer questions about the project at the Council meetings.

As part of the Section 106 process, project staff would like to seek your input regarding concerns and questions about the project including identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize, or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources. Enclosed are seven (7) printed copies each of the Archaeological Resources and Cultural Resources

Oahu Island Burial Council  
Page 2  
August 25, 2008

Technical Reports along with nine (9) CDs containing these two reports and the Historical Resources Technical Report as well, per previous request by the Council.

Any formal written comments on these three reports are requested by September 17, 2008, and should be addressed to:

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Should you have any questions regarding this matter, please contact Ms. Stephanie Roberts at 768-6143.

Very truly yours,

Wayne Y. Yoshioka  
Director

Enclosures:

Seven (7) copies of Archaeological Resources Technical Report  
Seven (7) copies of Cultural Resources Technical Report  
Nine (9) CDs containing PDF of Archaeological Resources,  
Cultural Resources, and Historical Resources  
Technical Reports

dc (F. Miyamoto)

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

850 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

September 30, 2008

RT9/08-279527

Mr. Jace L. McQuivey  
Oahu Island Burial Council  
State Historic Preservation Division  
Department of Land and Natural Resources  
State of Hawaii  
Kakuhihewa Building, Suite 555  
601 Kamokila Boulevard  
Kapolei, Hawai'i 96707

Dear Chair McQuivey:

Subject: Honolulu High-Capacity Transit Corridor Project

On behalf of the Rapid Transit Division and Honolulu's rail transit project team, thank you for meeting with us on Wednesday, September 10, 2008. I believe we had a very productive session, and all of us are looking forward to working with the O'ahu Island Burial Council (OIBC) to ensure that the planning and construction of the rail transit project include appropriate accommodations for the treatment and disposition of cultural resources, including iwi kūpuna.

As we begin the process of drafting a Memorandum of Agreement (MOA), I want to be sure to capture all of the input we received at the OIBC meeting.

First and foremost, we understand and support the OIBC's desire to fulfill its statutory requirements under Hawaii Revised Statutes (HRS) 6E-43.5(f) and the need for an appropriate role to be outlined in the MOA process. For that reason, the OIBC would like to be an invited signatory to the MOA rather than a concurring partner. While the final determination of signatories is made by the Federal Transit Administration (FTA), the City is fully supportive of the OIBC's role as a signatory, and we have already communicated this position to the FTA.

The OIBC has expressed concerns regarding the project's phased construction, and our current plans to do a phased archaeological inventory. The Council is concerned that constructing initial phases of the project might limit mitigation measures available to later project phases.

Mr. Jace L. McQuivey  
Page 2  
September 30, 2008

I would like to reiterate that our goal is to avoid unnecessary disturbance of cultural resources at this point in time, when the final footprints of the project have not been determined. The City will conduct the inventory once we have a high degree of finality in the project's design. We agree that the OIBC's suggestion to do two levels of inventory – a more detailed study of the earlier project phases and a project wide, less intrusive survey – should be pursued. I also want to make clear that it is our intent to complete the inventory work for the entire project at about the same time construction begins on the Pearl Highlands to Aloha Stadium segment and well in advance of the start of construction on the Aloha Stadium to Kapalama and the Kapalama to Ala Moana Center segments.

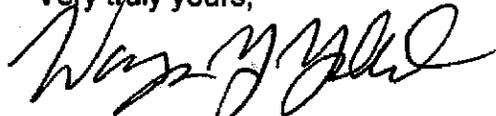
With regard to the archaeological inventory sampling plan, it will address areas that would be disturbed by the construction of: support columns, stations, traction power substations, gap breaker switching equipment, maintenance and storage facilities, and other supporting facilities. In those areas where there is a high likelihood that we will encounter iwi kūpuna, we will sample accordingly to ensure that our investigations are thorough and accurate. For example, in such areas, we will consider investigating each column location (which would apply to station locations as well).

We would like to offer OIBC members and staff the opportunity to tour the entire transit alignment and to receive a comprehensive project briefing.

Finally, we look forward to working together on a proposed MOA for the OIBC's consideration. While we are fully committed to keeping the entire OIBC engaged and involved in this process, our paramount concern is completing this work in a timely and expeditious manner. We would like to propose formation of a task force/subcommittee consisting of a subset of the OIBC that would meet more frequently than once a month. Appropriate project staff members will be detailed to work directly with the task force.

Again, many thanks for your willingness to work with us. We look forward to a warm and productive partnership. As related at the last OIBC meeting, Ms. Faith Miyamoto of the Rapid Transit Division will be the point of contact for the project. She can be reached at 768-8350.

Very truly yours,

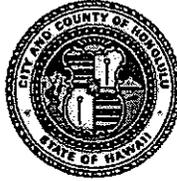


WAYNE Y. YOSHIOKA  
Director

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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



December 5, 2007

TPD07-00464

Hui Malama I Na Kupuna O Hawai'i Nei  
c/o OHA  
711 Kapi'olani Boulevard, Suite 500  
Honolulu, Hawaii 96813

Gentlemen:

Subject: Section 106 Coordination for the Honolulu High-Capacity Transit  
Corridor Project

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

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The DTS invites your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project. Project staff is available to brief your organization about the project. If you accept this invitation, staff soon will be contacting you regarding identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources.

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**DEC - 7 2007**

WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

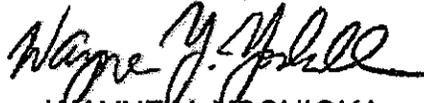
RICHARD F. TORRES  
DEPUTY DIRECTOR

Hui Malama I Na Kupuna O Hawai'i Nei  
December 5, 2007  
Page 2

Project staff is also in the process of contacting other parties regarding the Section 106 consultation process and would appreciate any suggestions from your office of additional parties to be consulted.

Should you have any questions regarding this matter, please contact Mr. Toru Hamayasu, Project Manager, at 768-8344.

Very truly yours,

  
WAYNE Y. VOSHIOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

dc (F. Miyamoto)

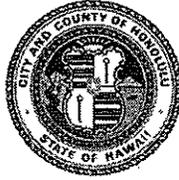


# CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813

Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 21, 2008

RT8/08-275915

Hui Malama I Na Kupuna O Hawai'i Nei  
c/o Office of Hawaiian Affairs  
711 Kapi'olani Boulevard, Suite 500  
Honolulu, Hawaii 96813

Dear Sir:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu, Department of Transportation Services (DTS), seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

DTS previously invited your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project in a letter dated December 5, 2007. DTS is expected to issue the Draft Environmental Impact Statement for the project in Fall 2008.

As part of the Section 106 process, project staff would like to seek your input regarding concerns and questions about the project including identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize, or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources. Enclosed are one (1) printed copy each of the Archaeological Resources and Cultural Resources Technical Reports along with one (1) CD containing these two reports and the Historical Resources Technical Report as well.

Any formal written comments are requested by September 17, 2008, and should be addressed to:

Hui Malama I Na Kupuna O Hawaii Nei  
Page 2  
August 28, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Project staff is also available to brief your organization about the project if requested. Should you have any questions regarding this matter, please contact Ms. Stephanie Roberts at 768-6143.

Very truly yours,

Wayne Y. Yoshioka  
Director

Enclosures:

Archaeological Resources Technical Report  
Cultural Resources Technical Report  
CD containing PDF of Archaeological Resources,  
Cultural Resources, and Historical Resources  
Technical Reports

dc (F. Miyamoto)

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

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HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

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**FILE COPY**  
**DEC - 7, 2007**

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

December 5, 2007

TPD07-00454

Royal Order of Kamehameha I  
Moku Kona  
P. O. Box 1924  
Kailua Kona, Hawaii 96745

Gentlemen:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

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The DTS invites your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project. Project staff is available to brief your organization about the project. If you accept this invitation, staff soon will be contacting you regarding identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources.

Royal Order of Kamehameha I  
December 5, 2007  
Page 2

Project staff is also in the process of contacting other parties regarding the Section 106 consultation process and would appreciate any suggestions from your office of additional parties to be consulted.

Should you have any questions regarding this matter, please contact Mr. Toru Hamayasu, Project Manager, at 768-8344.

Very truly yours,

  
WAYNE Y. YOSHIOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

dc (F. Miyamoto)

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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 21, 2008

RT8/08-275911

Royal Order of Kamehameha I  
Moku Kona  
P.O. Box 1924  
Kailua Kona, Hawaii 96745

Dear Sir:

Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu, Department of Transportation Services (DTS), seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

DTS previously invited your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project in a letter dated December 5, 2007. DTS is expected to issue the Draft Environmental Impact Statement for the project in Fall 2008.

As part of the Section 106 process, project staff would like to seek your input regarding concerns and questions about the project including identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize, or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources. Enclosed are one (1) printed copy each of the Archaeological Resources and Cultural Resources Technical Reports along with one (1) CD containing these two reports and the Historical Resources Technical Report as well.

Any formal written comments are requested by September 17, 2008, and should be addressed to:

Royal Order of Kamehameha I  
Page 2  
August 25, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Project staff is also available to brief your organization about the project if requested. Should you have any questions regarding this matter, please contact Ms. Stephanie Roberts at 768-6143.

Very truly yours,

Wayne Y. Yoshioka  
Director

Enclosures:

Archaeological Resources Technical Report  
Cultural Resources Technical Report  
CD containing PDF of Archaeological Resources,  
Cultural Resources, and Historical Resources  
Technical Reports

dc (F. Miyamoto)

RT10/08-282858



Ali'i Sir Wayne Iokepa, K.G.C.K.  
Ali'i 'Ai Moku

www.royalorderofkamehameha.org

Ali'i Sir Māhealani Pal, K.C.K.  
Kāka'ōlelo



**OFFICE OF THE KŪ'AUHAU  
MOKU O KONA**

P.O. Box 1924

Kailua Kona, Hawai'i 96745

October 6, 2008

Mr. Wayne Yoshioka  
Director, Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawai'i 96813

Re: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project

Aloha Mr. Yoshioka,

Mahalo a nui loa for your letter dated August 21, 2008 with regards to the above subject matter. We have had time to review the Cultural & Archaeological Resources Technical Reports and at this time have no immediate concerns or questions about the project. If we do have concerns or questions at a later time, we will inform you by a follow-up letter.

The Order of Kamehameha I was established on April 11, 1865 by his Majesty King Kamehameha V (Lot Kapuaiwa) to honor the legacy of his grandfather, the unifier of these islands, Kamehameha the Great. The Order was re-organized by Prince Jonah Kūhiō Kalaniana'ole in 1902. One of the Orders major purpose is to preserve and perpetuate the ancient customs and traditions of Hawai'i.

Mahalo again for your letter and if in the future you find the need for our assistance, do not hesitate to contact us through our website, [www.royalorderofkamehameha.org](http://www.royalorderofkamehameha.org).

*"E na'i wale no 'oukou, i ku'u pono 'a'ole i pau."  
"Strive to pursue my unfinished good deeds."*

Kamehameha I

Me ka 'oia 'i'o,  
*Russell Pal*  
Ali'i Russell Pal  
Kū'auhau, Moku O Kona

RECEIVED  
OCT 8 P 3:05  
DIRECTOR'S OFFICE  
DEPARTMENT OF TRANSPORTATION SERVICES



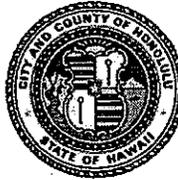
DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

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**FILE COPY**  
DEC - 7 2007

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

December 5, 2007

TPD07-00461

Ms. Donna Lei Smythe  
The Ahahui Kaahumanu  
58 Old Pali Place  
Honolulu, Hawaii 96817

Dear Ms. Smythe:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

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The DTS invites your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project. Project staff is available to brief your organization about the project. If you accept this invitation, staff soon will be contacting you regarding identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources.

Ms. Donna Lei Smythe  
December 5, 2007  
Page 2

Project staff is also in the process of contacting other parties regarding the Section 106 consultation process and would appreciate any suggestions from your office of additional parties to be consulted.

Should you have any questions regarding this matter, please contact Mr. Toru Hamayasu, Project Manager, at 768-8344.

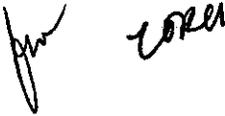
Very truly yours,

  
WAYNE Y. YOSHIOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

dc (F. Miyamoto)

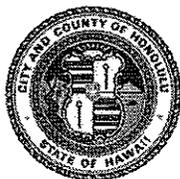


# CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 21, 2008

RT8/08-275912

Ms. Donna Lei Smythe  
The Ahahui Kaahumanu  
58 Old Pali Place  
Honolulu, Hawaii 96817

Dear Ms. Smythe:

Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu, Department of Transportation Services (DTS), seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

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Ms. Donna Lei Smythe  
Page 2  
August 25, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

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Very truly yours,

Wayne Y. Yoshioka  
Director

Enclosures:

Archaeological Resources Technical Report  
Cultural Resources Technical Report  
CD containing PDF of Archaeological Resources,  
Cultural Resources, and Historical Resources  
Technical Reports

dc (F. Miyamoto)

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

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HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



December 5, 2007

TPD07-00462

8.49.7.4  
**FILE COPY**  
**DEC - 7 2007**  
WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

Mr. Hailama Farden  
The Hale O Na Ali'i O Hawaii  
P. O. Box 15704  
Honolulu, Hawaii 96804

Dear Mr. Farden:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

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Mr. Hailama Farden  
December 5, 2007  
Page 2

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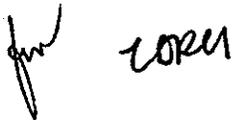
Very truly yours,

  
WAYNE Y. YOSHIOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

dc (F. Miyamoto)

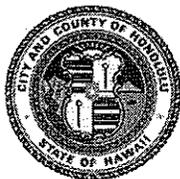


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MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 21, 2008

RT8/08-275913

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The Hale O Na Ali'i O Hawaii  
P.O. Box 15704  
Honolulu, Hawaii 96804

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Page 2  
August 25, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

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Wayne Y. Yoshioka  
Director

Enclosures:

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CD containing PDF of Archaeological Resources,  
Cultural Resources, and Historical Resources  
Technical Reports

dc (F. Miyamoto)

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

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HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

849.7.4

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**DEC - 7 2007**

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

December 5, 2007

TPD07-00463

Ms. El-rayna Adam  
The Daughter & Sons of the Hawaiian Warriors  
928 9th Avenue  
Honolulu, Hawaii 96816

Dear Ms. Adam:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

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Ms. El-rayna Adam  
December 5, 2007  
Page 2

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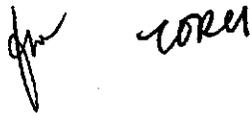
Very truly yours,

  
WAYNE V. YOSHIOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

dc (F. Miyamoto)



# CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813

Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 21, 2008

RT8/08-275914

Ms. EiRayna Adams  
Daughters & Sons of Hawaiian Warriors  
928 9th Avenue  
Honolulu, Hawaii 96816

Dear Ms. Adams:

Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project

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Ms. EIRayna Adams  
Page 2  
August 25, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

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Very truly yours,

Wayne Y. Yoshioka  
Director

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dc (F. Miyamoto)

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

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**DEC - 7 2007**

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

December 5, 2007

TPD07-00465

Association of Hawaiian Civic Clubs  
c/o OHA  
711 Kapi'olani Boulevard, Suite 500  
Honolulu, Hawaii 96813

Gentlemen:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

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Association of Hawaiian Civic Clubs  
December 5, 2007  
Page 2

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Very truly yours,

  
WAYNE Y. YOSHIOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

dc (F. Miyamoto)

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

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MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 21, 2008

RT8/08-275916

Association of Hawaiian Civic Clubs  
c/o Office of Hawaiian Affairs  
711 Kapi'olani Boulevard, Suite 500  
Honolulu, Hawaii 96813

Dear Sir:

Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project

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Any formal written comments are requested by September 17, 2008, and should be addressed to:

Association of Hawaiian Civic Clubs  
Page 2  
August 25, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

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Director

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dc (F. Miyamoto)

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**CITY AND COUNTY OF HONOLULU**

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

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**DEC - 7 2007**

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

December 5, 2007

TPD07-00444

Ahahui Siwila Hawaii O Kapolei  
Hawaiian Civic Club  
P.O. Box 700007  
Kapolei, Hawaii 96709-007

Gentlemen:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

The DTS, in cooperation with FTA, is preparing an Environmental Impact Statement (EIS) to evaluate alternatives that would provide high-capacity transit service on O'ahu. The project study area is the travel corridor between Kapolei and the University of Hawai'i at Mānoa and Waikīkī. This corridor includes the majority of housing and employment on O'ahu. A map of the transit corridor is enclosed. Scoping for the EIS was completed in two phases: Chapter 343, Hawaii Revised Statutes scoping was completed in December 2005 and scoping for the National Environmental Policy Act (NEPA) was completed in April 2007.

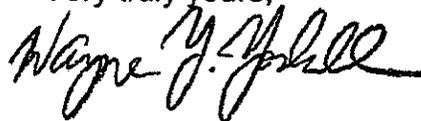
The DTS invites your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project. Project staff is available to brief your organization about the project. If you accept this invitation, staff soon will be contacting you regarding identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources.

Ahahui Siwila Hawaii O Kapolei  
Hawaiian Civic Club  
December 5, 2007  
Page 2

Project staff is also in the process of contacting other parties regarding the Section 106 consultation process and would appreciate any suggestions from your office of additional parties to be consulted.

Should you have any questions regarding this matter, please contact Mr. Toru Hamayasu, Project Manager, at 768-8344.

Very truly yours,

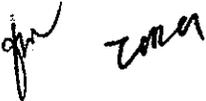


WAYNE Y. YOSHIOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

dc (F. Miyamoto)



DEPARTMENT OF TRANSPORTATION SERVICES

**CITY AND COUNTY OF HONOLULU**

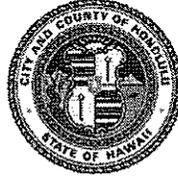
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813

Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR

WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR



August 25, 2008

RT8/08-275905

Ahahui Siwila Hawaii O Kapolei  
Hawaiian Civic Club  
P.O. Box 700007  
Kapolei, Hawaii 96709-007

Dear Sir:

Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu, Department of Transportation Services (DTS), seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

DTS previously invited your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project in a letter dated December 5, 2007. DTS is expected to issue the Draft Environmental Impact Statement for the project in Fall 2008.

As part of the Section 106 process, project staff would like to seek your input regarding concerns and questions about the project including identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize, or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources. Enclosed are one (1) printed copy each of the Archaeological Resources and Cultural Resources Technical

Reports along with one (1) CD containing these two reports and the Historical Resources Technical Report as well.

Ahahui Siwila Hawaii O Kapolei  
Hawaiian Civic Club  
Page 2  
August 25, 2008

Any formal written comments are requested by September 17, 2008, and should be addressed to:

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, HI 96813

Project staff is also available to brief your organization about the project if requested. Should you have any questions regarding this matter, please contact Ms. Stephanie Roberts at 768-6143.

Very truly yours,

Wayne Y. Yoshioka  
Director

Enclosures:

Archaeological Resources Technical Report  
Cultural Resources Technical Report  
CD containing PDF of Archaeological Resources,  
Cultural Resources, and Historical Resources  
Technical Reports

dc (F. Miyamoto)

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

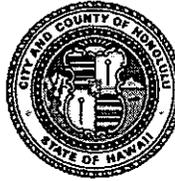
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**DEC - 7 2007**

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

December 5, 2007

TPD07-00445

Ali'i Pauahi Hawaiian Civic Club  
P. O. Box 2965  
Aiea, Hawaii 96701

Gentlemen:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

The DTS, in cooperation with FTA, is preparing an Environmental Impact Statement (EIS) to evaluate alternatives that would provide high-capacity transit service on O'ahu. The project study area is the travel corridor between Kapolei and the University of Hawai'i at Mānoa and Waikīki. This corridor includes the majority of housing and employment on O'ahu. A map of the transit corridor is enclosed. Scoping for the EIS was completed in two phases: Chapter 343, Hawaii Revised Statutes scoping was completed in December 2005 and scoping for the National Environmental Policy Act (NEPA) was completed in April 2007.

The DTS invites your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project. Project staff is available to brief your organization about the project. If you accept this invitation, staff soon will be contacting you regarding identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources.

Ali'i Pauahi Hawaiian Civic Club  
December 5, 2007  
Page 2

Project staff is also in the process of contacting other parties regarding the Section 106 consultation process and would appreciate any suggestions from your office of additional parties to be consulted.

Should you have any questions regarding this matter, please contact Mr. Toru Hamayasu, Project Manager, at 768-8344.

Very truly yours,

  
WAYNE Y. YOSHIOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

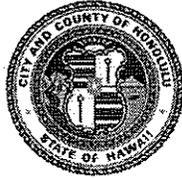
dc (F. Miyamoto)



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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 21, 2008

RT8/08-275906

Ali'i Pauahi Hawaiian Civic Club  
P.O. Box 2965  
Aiea, Hawaii 96701

Dear Sir:

Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu, Department of Transportation Services (DTS), seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

DTS previously invited your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project in a letter dated December 5, 2007. DTS is expected to issue the Draft Environmental Impact Statement for the project in Fall 2008.

As part of the Section 106 process, project staff would like to seek your input regarding concerns and questions about the project including identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize, or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources. Enclosed are one (1) printed copy each of the Archaeological Resources and Cultural Resources Technical Reports along with one (1) CD containing these two reports and the Historical Resources Technical Report as well.

Any formal written comments are requested by September 17, 2008, and should be addressed to:

Al'i Pauahi Hawaiian Civic Club  
Page 2  
August 25, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Project staff is also available to brief your organization about the project if requested.

Should you have any questions regarding this matter, please contact Ms. Stephanie Roberts at 768-6143.

Very truly yours,

Wayne Y. Yoshioka  
Director

Enclosures:

Archaeological Resources Technical Report  
Cultural Resources Technical Report  
CD containing PDF of Archaeological Resources,  
Cultural Resources, and Historical Resources  
Technical Reports

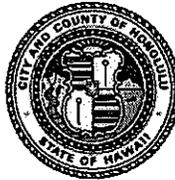
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DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**

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MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

December 5, 2007

TPD07-00446

Hawaiian Civic Club of 'Ewa-Pu'uloa  
91-1450 Renton Road, #3  
Ewa Beach, Hawaii 96706-4202

Gentlemen:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

The DTS, in cooperation with FTA, is preparing an Environmental Impact Statement (EIS) to evaluate alternatives that would provide high-capacity transit service on O'ahu. The project study area is the travel corridor between Kapolei and the University of Hawai'i at Mānoa and Waikīkī. This corridor includes the majority of housing and employment on O'ahu. A map of the transit corridor is enclosed. Scoping for the EIS was completed in two phases: Chapter 343, Hawaii Revised Statutes scoping was completed in December 2005 and scoping for the National Environmental Policy Act (NEPA) was completed in April 2007.

The DTS invites your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project. Project staff is available to brief your organization about the project. If you accept this invitation, staff soon will be contacting you regarding identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources.

Hawaiian Civic Club of 'Ewa-Pu'uloa  
December 5, 2007  
Page 2

Project staff is also in the process of contacting other parties regarding the Section 106 consultation process and would appreciate any suggestions from your office of additional parties to be consulted.

Should you have any questions regarding this matter, please contact Mr. Toru Hamayasu, Project Manager, at 768-8344.

Very truly yours,

  
WAYNE Y. YOSHIOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

dc (F. Miyamoto)

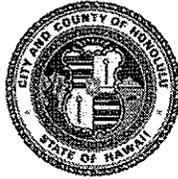


**CITY AND COUNTY OF HONOLULU**

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MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 25, 2008

RT8/08-275797

Hawaiian Civic Club of 'Ewa-Pu'uloa  
91-1450 Renton Road, #3  
Ewa Beach, Hawaii 96706-4202

Dear Sir:

Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu, Department of Transportation Services (DTS), seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

DTS previously invited your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project in a letter dated December 5, 2007. DTS is expected to issue the Draft Environmental Impact Statement in Fall 2008. We appreciated your inviting us to provide information about the project on August 5, 2008.

As part of the Section 106 process, project staff would like to seek your input regarding concerns and questions about the project including identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize, or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources. Enclosed are one (1) printed copy each of the Archaeological Resources and Cultural Resources Technical Reports along with one (1) CD containing these two reports and the Historical Resources Technical Report as well. Any formal written comments on these three documents are requested by September 17, 2008, and should be addressed to:

Hawaiian Civic Club of 'Ewa-Pu'uloa  
Page 2  
August 25, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Project staff would also be available to brief your organization at any time about the project if requested.

Should you have any questions regarding this matter, please contact Ms. Stephanie Roberts at 768-6143.

Very truly yours,

Wayne Y. Yoshioka  
Director

Enclosures:

Archaeological Resources Technical Report  
Cultural Resources Technical Report  
CD containing PDF of Archaeological Resources,  
Cultural Resources, and Historical Resources  
Technical Reports

dc (F. Miyamoto)

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DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
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**DEC - 7 2007**

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

December 5, 2007

TPD07-00448

Hawaiian Civic Club of Honolulu  
P. O. Box 1513  
Honolulu, Hawaii 96806

Gentlemen:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

The DTS, in cooperation with FTA, is preparing an Environmental Impact Statement (EIS) to evaluate alternatives that would provide high-capacity transit service on O'ahu. The project study area is the travel corridor between Kapolei and the University of Hawai'i at Mānoa and Waikīkī. This corridor includes the majority of housing and employment on O'ahu. A map of the transit corridor is enclosed. Scoping for the EIS was completed in two phases: Chapter 343, Hawaii Revised Statutes scoping was completed in December 2005 and scoping for the National Environmental Policy Act (NEPA) was completed in April 2007.

The DTS invites your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project. Project staff is available to brief your organization about the project. If you accept this invitation, staff soon will be contacting you regarding identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources.

Hawaiian Civic Club of Honolulu  
December 5, 2007  
Page 2

Project staff is also in the process of contacting other parties regarding the Section 106 consultation process and would appreciate any suggestions from your office of additional parties to be consulted.

Should you have any questions regarding this matter, please contact Mr. Toru Hamayasu, Project Manager, at 768-8344.

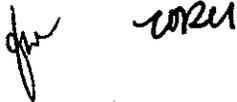
Very truly yours,

  
WAYNE Y. YOSHIOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

dc (F. Miyamoto)

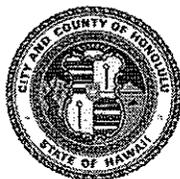


# CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813

Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 21, 2008

RT8/08-275922

Hawaiian Civic Club of Honolulu  
P.O. Box 1513  
Honolulu, Hawaii 96806

Dear Sir:

Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu, Department of Transportation Services (DTS), seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

DTS previously invited your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project in a letter dated December 5, 2007. DTS is expected to issue the Draft Environmental Impact Statement for the project in Fall 2008.

As part of the Section 106 process, project staff would like to seek your input regarding concerns and questions about the project including identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize, or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources. Enclosed are one (1) printed copy each of the Archaeological Resources and Cultural Resources Technical Reports along with one (1) CD containing these two reports and the Historical Resources Technical Report as well.

Any formal written comments are requested by September 17, 2008, and should be addressed to:

Hawaiian Civic Club of Honolulu  
Page 2  
August 25, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Project staff is also available to brief your organization about the project if requested. Should you have any questions regarding this matter, please contact Ms. Stephanie Roberts at 768-6143.

Very truly yours,

Wayne Y. Yoshioka  
Director

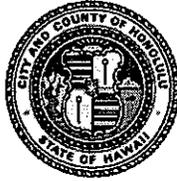
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Technical Reports

dc (F. Miyamoto)

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

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MUFI HANNEMANN  
MAYOR

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WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

December 5, 2007

TPD07-00449

Ka Lei Maile Ali'i Hawaiian Civic Club  
2505-C Lai Road  
Honolulu, Hawaii 96816

Gentlemen:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

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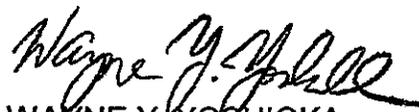
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Ka Lei Maile Ali'i Hawaiian Civic Club  
December 5, 2007  
Page 2

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Should you have any questions regarding this matter, please contact Mr. Toru Hamayasu, Project Manager, at 768-8344.

Very truly yours,

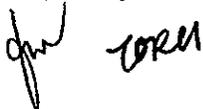


WAYNE Y. YOSHIOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

dc (F. Miyamoto)

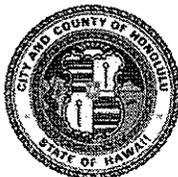


**CITY AND COUNTY OF HONOLULU**

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813

Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 21, 2008

RT8/08-275907

Ka Lei Maile Ali'i Hawaiian Civic Club  
2505-C Lai Road  
Honolulu, Hawaii 96816

Dear Sir:

Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu, Department of Transportation Services (DTS), seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

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Ka Lei Maile Ali'i Hawaiian Civic Club  
Page 2  
August 25, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Project staff is also available to brief your organization about the project if requested.

Should you have any questions regarding this matter, please contact Ms. Stephanie Roberts at 768-6143.

Very truly yours,

Wayne Y. Yoshioka  
Director

Enclosures:

Archaeological Resources Technical Report  
Cultural Resources Technical Report  
CD containing PDF of Archaeological Resources,  
Cultural Resources, and Historical Resources  
Technical Reports

dc (F. Miyamoto)

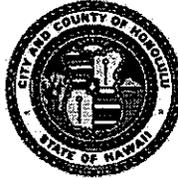
DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

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**DEC - 7 2007**

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

December 5, 2007

TPD07-00450

Kalihi-Palama Hawaiian Civic Club  
21 South Kuakini Street, #339  
Honolulu, Hawaii 96813

Gentlemen:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

The DTS, in cooperation with FTA, is preparing an Environmental Impact Statement (EIS) to evaluate alternatives that would provide high-capacity transit service on O'ahu. The project study area is the travel corridor between Kapolei and the University of Hawai'i at Mānoa and Waikīkī. This corridor includes the majority of housing and employment on O'ahu. A map of the transit corridor is enclosed. Scoping for the EIS was completed in two phases: Chapter 343, Hawaii Revised Statutes scoping was completed in December 2005 and scoping for the National Environmental Policy Act (NEPA) was completed in April 2007.

The DTS invites your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project. Project staff is available to brief your organization about the project. If you accept this invitation, staff soon will be contacting you regarding identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources.

Kalihi-Palama Hawaiian Civic Club  
December 5, 2007  
Page 2

Project staff is also in the process of contacting other parties regarding the Section 106 consultation process and would appreciate any suggestions from your office of additional parties to be consulted.

Should you have any questions regarding this matter, please contact Mr. Toru Hamayasu, Project Manager, at 768-8344.

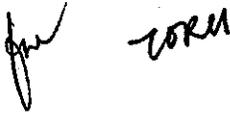
Very truly yours,

  
WAYNE Y. YOSHIOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

dc (F. Miyamoto)

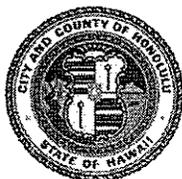


## CITY AND COUNTY OF HONOLULU

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Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 21, 2008

RT8/08-275921

Kalihi-Palama Hawaiian Civic Club  
21 South Kuakini Street, #339  
Honolulu, Hawaii 96813

Dear Sir:

Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu, Department of Transportation Services (DTS), seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

DTS previously invited your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project in a letter dated December 5, 2007. DTS is expected to issue the Draft Environmental Impact Statement for the project in Fall 2008.

As part of the Section 106 process, project staff would like to seek your input regarding concerns and questions about the project including identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize, or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources. Enclosed are one (1) printed copy each of the Archaeological Resources and Cultural Resources Technical Reports along with one (1) CD containing these two reports and the Historical Resources Technical Report as well.

Any formal written comments are requested by September 17, 2008, and should be addressed to:

Kalihi-Palama Hawaiian Civic Club  
Page 2  
August 25, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Project staff is also available to brief your organization about the project if requested. Should you have any questions regarding this matter, please contact Ms. Stephanie Roberts at 768-6143.

Very truly yours,

Wayne Y. Yoshioka  
Director

Enclosures:

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dc (F. Miyamoto)

8,49.7.4

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

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**DEC - 7 2007**

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

December 5, 2007

TPD07-00447

King Kamehameha Hawaiian Civic Club  
98-505 Kaamilo Street  
Aiea, Hawaii 96701

Gentlemen:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

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The DTS invites your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project. Project staff is available to brief your organization about the project. If you accept this invitation, staff soon will be contacting you regarding identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources.

King Kamehameha Hawaiian Civic Club  
December 5, 2007  
Page 2

Project staff is also in the process of contacting other parties regarding the Section 106 consultation process and would appreciate any suggestions from your office of additional parties to be consulted.

Should you have any questions regarding this matter, please contact Mr. Toru Hamayasu, Project Manager, at 768-8344.

Very truly yours,

  
WAYNE V. YOSHIOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

dc (F. Miyamoto)

## CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813

Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 21, 2008

RT8/08-275908

King Kamehameha Hawaiian Civic Club  
98-505 Kaamilo Street  
Aiea, Hawaii 96701

Dear Sir:

Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu, Department of Transportation Services (DTS), seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

DTS previously invited your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project in a letter dated December 5, 2007. DTS is expected to issue the Draft Environmental Impact Statement for the project in Fall 2008.

As part of the Section 106 process, project staff would like to seek your input regarding concerns and questions about the project including identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize, or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources. Enclosed are one (1) printed copy each of the Archaeological Resources and Cultural Resources Technical Reports along with one (1) CD containing these two reports and the Historical Resources Technical Report as well.

Any formal written comments are requested by September 17, 2008, and should be addressed to:

King Kamehameha Hawaiian Civic Club  
Page 2  
August 25, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Project staff is available to brief your organization about the project if requested. Should you have any questions regarding this matter, please contact Ms. Stephanie Roberts at 768-6143.

Very truly yours,

Wayne Y. Yoshioka  
Director

Enclosures:

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dc (F. Miyamoto)

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

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**DEC - 7 2007**

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

December 5, 2007

TPD07-00466

Merchant Street Hawaiian Civic Club  
c/o OHA  
711 Kapi'olani Boulevard, Suite 500  
Honolulu, Hawaii 96813

Gentlemen:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

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The DTS invites your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project. Project staff is available to brief your organization about the project. If you accept this invitation, staff soon will be contacting you regarding identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources.

Merchant Street Hawaiian Civic Club  
December 5, 2007  
Page 2

Project staff is also in the process of contacting other parties regarding the Section 106 consultation process and would appreciate any suggestions from your office of additional parties to be consulted.

Should you have any questions regarding this matter, please contact Mr. Toru Hamayasu, Project Manager, at 768-8344.

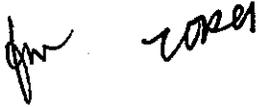
Very truly yours,

  
WAYNE Y. YOSHIOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

dc (F. Miyamoto)

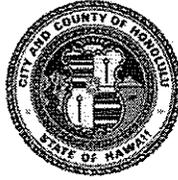


# CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813

Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 21, 2008

RT8/08-275917

Merchant Street Hawaiian Civic Club  
c/o Office of Hawaiian Affairs  
711 Kapi'olani Boulevard, Suite 500  
Honolulu, Hawaii 96813

Dear Sir:

Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu, Department of Transportation Services (DTS), seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

DTS previously invited your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project in a letter dated December 5, 2007. DTS is expected to issue the Draft Environmental Impact Statement for the project in Fall 2008.

As part of the Section 106 process, project staff would like to seek your input regarding concerns and questions about the project including identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize, or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources. Enclosed are one (1) printed copy each of the Archaeological Resources and Cultural Resources Technical Reports along with one (1) CD containing these two reports and the Historical Resources Technical Report as well.

Any formal written comments are requested by September 17, 2008, and should be addressed to:

Merchant Street Hawaiian Civic Club  
Page 2  
August 25, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Project staff is also available to brief your organization about the project if requested. Should you have any questions regarding this matter, please contact Ms. Stephanie Roberts at 768-6143.

Very truly yours,

Wayne Y. Yoshioka  
Director

Enclosures:

Archaeological Resources Technical Report  
Cultural Resources Technical Report  
CD containing PDF of Archaeological Resources,  
Cultural Resources, and Historical Resources  
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dc (F. Miyamoto)

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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

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**DEC - 7 2007**

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

December 5, 2007

TPD07-00467

Nanaikapono Hawaiian Civic Club  
c/o OHA  
711 Kapi'olani Boulevard, Suite 500  
Honolulu, Hawaii 96813

Gentlemen:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit  
Corridor Project**

---

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

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The DTS invites your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project. Project staff is available to brief your organization about the project. If you accept this invitation, staff soon will be contacting you regarding identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources.

Nanaikapono Hawaiian Civic Club  
December 5, 2007  
Page 2

Project staff is also in the process of contacting other parties regarding the Section 106 consultation process and would appreciate any suggestions from your office of additional parties to be consulted.

Should you have any questions regarding this matter, please contact Mr. Toru Hamayasu, Project Manager, at 768-8344.

Very truly yours,



WAYNE Y. YOSHIOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

dc (F. Miyamoto)



## CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813

Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 25, 2008

RT8/08-275827

Nanaikapono Hawaiian Civic Club  
c/o Office of Hawaiian Affairs  
711 Kapiolani Boulevard, Suite 500  
Honolulu, Hawaii 96813

Dear Sir:

Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu, Department of Transportation Services (DTS), seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

DTS previously invited your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project in a letter dated December 5, 2007. DTS is expected to issue the Draft Environmental Impact Statement in Fall 2008. We appreciated your inviting us to provide information about the project on August 7, 2008.

As part of the Section 106 process, project staff would like to seek your input regarding concerns and questions about the project including identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize, or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources. Enclosed are one (1) printed copy each of the Archaeological Resources and Cultural Resources Technical Reports along with one (1) CD containing these two reports and the Historical Resources Technical Report as well. Any formal written comments on these three documents are requested by September 17, 2008, and should be addressed to:

Nanaikapono Hawaiian Civic Club  
Page 2  
August 25, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Project staff would also be available to brief your organization at any time about the project if requested.

Should you have any questions regarding this matter, please contact Ms. Stephanie Roberts at 768-6143.

Very truly yours,

Wayne Y. Yoshioka  
Director

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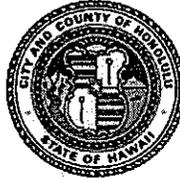
DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**

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HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

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**DEC - 7 2007**

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

December 5, 2007

TPD07-00451

Pearl Harbor Hawaiian Civic Club  
P. O. Box 66  
Aiea, Hawaii 96701

Gentlemen:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

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Pearl Harbor Hawaiian Civic Club  
December 5, 2007  
Page 2

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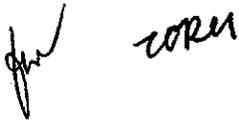
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WAYNE Y. YOSHIOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

dc (F. Miyamoto)

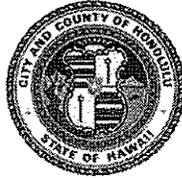


# CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 21, 2008

RT8/08-275909

Pearl Harbor Hawaiian Civic Club  
P.O. Box 66  
Aiea, Hawaii 96701

Dear Sir:

Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu, Department of Transportation Services (DTS), seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

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Pearl Harbor Hawaiian Civic Club  
Page 2  
August 25, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Project staff is also available to brief your organization about the project if requested. Should you have any questions regarding this matter, please contact Ms. Stephanie Roberts at 768-6143.

Very truly yours,

Wayne Y. Yoshioka  
Director

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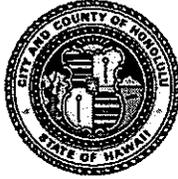
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DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**

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MUFI HANNEMANN  
MAYOR



December 5, 2007

TPD07-00452

849.7.4

**FILE COPY**

**DEC - 7 2007**

WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

Prince Kuhio Hawaiian Civic Club  
PO Box 4278  
Honolulu, Hawaii 96812

Gentlemen:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

---

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

The DTS, in cooperation with FTA, is preparing an Environmental Impact Statement (EIS) to evaluate alternatives that would provide high-capacity transit service on O'ahu. The project study area is the travel corridor between Kapolei and the University of Hawai'i at Mānoa and Waikīkī. This corridor includes the majority of housing and employment on O'ahu. A map of the transit corridor is enclosed. Scoping for the EIS was completed in two phases: Chapter 343, Hawaii Revised Statutes scoping was completed in December 2005 and scoping for the National Environmental Policy Act (NEPA) was completed in April 2007.

The DTS invites your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project. Project staff is available to brief your organization about the project. If you accept this invitation, staff soon will be contacting you regarding identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources.

Prince Kuhio Hawaiian Civic Club  
December 5, 2007  
Page 2

Project staff is also in the process of contacting other parties regarding the Section 106 consultation process and would appreciate any suggestions from your office of additional parties to be consulted.

Should you have any questions regarding this matter, please contact Mr. Toru Hamayasu, Project Manager, at 768-8344.

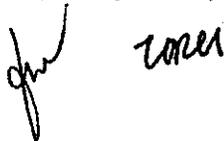
Very truly yours,

  
WAYNE V. YOSHIOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

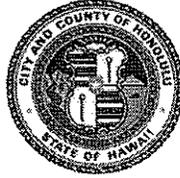
dc (F. Miyamoto)



# CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 21, 2008

RT8/08-275910

Prince Kuhio Hawaiian Civic Club  
P.O. Box 4278  
Honolulu, Hawaii 96812

Dear Sir:

Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu, Department of Transportation Services (DTS), seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

DTS previously invited your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project in a letter dated December 5, 2007. DTS is expected to issue the Draft Environmental Impact Statement for the project in Fall 2008.

As part of the Section 106 process, project staff would like to seek your input regarding concerns and questions about the project including identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize, or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources. Enclosed are one (1) printed copy each of the Archaeological Resources and Cultural Resources Technical Reports along with one (1) CD containing these two reports and the Historical Resources Technical Report as well.

Any formal written comments are requested by September 17, 2008, and should be addressed to:

Prince Kuhio Hawaiian Civic Club  
Page 2  
August 25, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Project staff is also available to brief your organization about the project if requested. Should you have any questions regarding this matter, please contact Ms. Stephanie Roberts at 768-6143.

Very truly yours,

Wayne Y. Yoshioka  
Director

Enclosures:

Archaeological Resources Technical Report  
Cultural Resources Technical Report  
CD containing PDF of Archaeological Resources,  
Cultural Resources, and Historical Resources  
Technical Reports

dc (F. Miyamoto)

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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

8,497.4

**FILE COPY**

**DEC - 7 2007**

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

December 5, 2007

TPD07-00469

Princess Kai'ulani Hawaiian Civic Club  
c/o OHA  
711 Kapi'olani Boulevard, Suite 500  
Honolulu, Hawaii 96813

Gentlemen:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

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Princess Kai'ulani Hawaiian Civic Club  
December 5, 2007  
Page 2

Project staff is also in the process of contacting other parties regarding the Section 106 consultation process and would appreciate any suggestions from your office of additional parties to be consulted.

Should you have any questions regarding this matter, please contact Mr. Toru Hamayasu, Project Manager, at 768-8344.

Very truly yours,

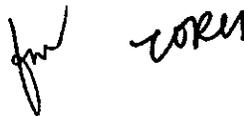


WAYNE Y. YOSHIOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

dc (F. Miyamoto)

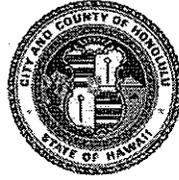


# CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813

Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 21, 2008

RT8/08-275919

Princess Kai'ulani Hawaiian Civic Club  
c/o Office of Hawaiian Affairs  
711 Kapi'olani Boulevard, Suite 500  
Honolulu, Hawaii 96813

Dear Sir:

Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu, Department of Transportation Services (DTS), seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

DTS previously invited your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project in a letter dated December 5, 2007. DTS is expected to issue the Draft Environmental Impact Statement for the project in Fall 2008.

As part of the Section 106 process, project staff would like to seek your input regarding concerns and questions about the project including identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize, or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources. Enclosed are one (1) printed copy each of the Archaeological Resources and Cultural Resources Technical Reports along with one (1) CD containing these two reports and the Historical Resources Technical Report as well.

Any formal written comments are requested by September 17, 2008, and should be addressed to:

Princess Kai'ulani Hawaiian Civic Club  
Page 2  
August 25, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Project staff is also available to brief your organization about the project if requested. Should you have any questions regarding this matter, please contact Ms. Stephanie Roberts at 768-6143.

Very truly yours,

Wayne Y. Yoshioka  
Director

Enclosures:

Archaeological Resources Technical Report  
Cultural Resources Technical Report  
CD containing PDF of Archaeological Resources,  
Cultural Resources, and Historical Resources  
Technical Reports

dc (F. Miyamoto)

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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov



MUFI HANNEMANN  
MAYOR

8.4974  
**FILE COPY**  
**DEC - 7 2007**

WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

December 5, 2007

TPD07-00470

Hawaiian Civic Club of Wahiawa  
931 Peach Street  
Wahiawa, Hawaii 96786-2019

Gentlemen:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

The DTS, in cooperation with FTA, is preparing an Environmental Impact Statement (EIS) to evaluate alternatives that would provide high-capacity transit service on O'ahu. The project study area is the travel corridor between Kapolei and the University of Hawai'i at Mānoa and Waikīkī. This corridor includes the majority of housing and employment on O'ahu. A map of the transit corridor is enclosed. Scoping for the EIS was completed in two phases: Chapter 343, Hawaii Revised Statutes scoping was completed in December 2005 and scoping for the National Environmental Policy Act (NEPA) was completed in April 2007.

The DTS invites your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project. Project staff is available to brief your organization about the project. If you accept this invitation, staff soon will be contacting you regarding identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources.

Hawaiian Civic Club of Wahiawa  
December 5, 2007  
Page 2

Project staff is also in the process of contacting other parties regarding the Section 106 consultation process and would appreciate any suggestions from your office of additional parties to be consulted.

Should you have any questions regarding this matter, please contact Mr. Toru Hamayasu, Project Manager, at 768-8344.

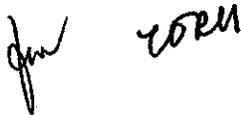
Very truly yours,

  
WAYNE Y. YOSHIOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

dc (F. Miyamoto)

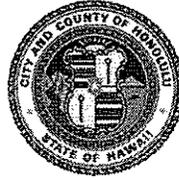


# CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813

Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 25, 2008

RT8/08-275875

Hawaiian Civic Club of Wahiawa  
931 Peach Street  
Wahiawa, Hawaii 96786-2019

Dear Sir:

Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu, Department of Transportation Services (DTS), seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

DTS previously invited your organization to be a consulting party in the Section 106 process for the Honolulu High-Capacity Transit Corridor Project in a letter dated December 5, 2007. DTS is expected to issue the Draft Environmental Impact Statement in Fall 2008. We appreciated your inviting us to provide information about the project on August 13, 2008.

As part of the Section 106 process, project staff would like to seek your input regarding concerns and questions about the project including identifying resources that could be affected by the project, assessing the project's potential effects on such resources, and seeking ways to avoid, minimize, or mitigate any adverse effects caused by the project to historic, cultural, and archaeological resources. Enclosed are one (1) printed copy each of the Archaeological Resources and Cultural Resources Technical Reports along with one (1) CD containing these two reports and the Historical Resources Technical Report as well. Any formal written comments on these three documents are requested by September 17, 2008, and should be addressed to:

Hawaiian Civic Club of Wahiawa  
Page 2  
August 25, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Project staff would also be available to brief your organization at any time about the project if requested.

Should you have any questions regarding this matter, please contact Ms. Stephanie Roberts at 768-6143.

Very truly yours,

Wayne Y. Yoshioka  
Director

Enclosures:

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Cultural Resources Technical Report  
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Technical Reports

dc (F. Miyamoto)

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

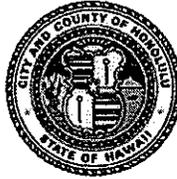
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HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

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**FILE COPY**

**DEC - 7 2007**

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

December 5, 2007

TPD07-00468

Waianae Hawaiian Civic Club  
c/o OHA  
711 Kapi'olani Boulevard, Suite 500  
Honolulu, Hawaii 96813

Gentlemen:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

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Waianae Hawaiian Civic Club  
December 5, 2007  
Page 2

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Very truly yours,

  
WAYNE Y. YOSHIOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

dc (F. Miyamoto)

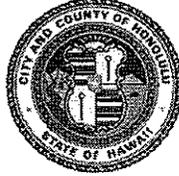
 

# CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813

Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 21, 2008

RT8/08-275918

Waianae Hawaiian Civic Club  
c/o Office of Hawaiian Affairs  
711 Kapi'olani Boulevard, Suite 500  
Honolulu, Hawaii 96813

Dear Sir:

Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project

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Waianae Hawaiian Civic Club  
Page 2  
August 25, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

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Very truly yours,

Wayne Y. Yoshioka  
Director

Enclosures:

Archaeological Resources Technical Report  
Cultural Resources Technical Report  
CD containing PDF of Archaeological Resources,  
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Technical Reports

dc (F. Miyamoto)

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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



December 5, 2007

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**FILE COPY**  
**DEC - 7 2007**  
WAYNE Y. YOSHIOKA  
ACTING DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

TPD07-00471

Waikīkī Hawaiian Civic Club  
P. O. Box 8602  
Honolulu, Hawaii 96730

Gentlemen:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu Department of Transportation Services (DTS) seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

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Waikiki Hawaiian Civic Club  
December 5, 2007  
Page 2

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Should you have any questions regarding this matter, please contact Mr. Toru Hamayasu, Project Manager, at 768-8344.

Very truly yours,

  
WAYNE T. YOSHIOKA  
Acting Director

Enclosure

cc: Mr. Ted Matley, FTA Region IX

dc (F. Miyamoto)

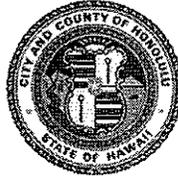


# CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR  
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MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

August 21, 2008

RT8/08-275920

Waikīkī Hawaiian Civic Club  
P.O. Box 8602  
Honolulu, Hawaii 96730

Dear Sir:

**Subject: Section 106 Coordination for the Honolulu High-Capacity Transit Corridor Project**

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their actions on historic resources. As part of the Section 106 process, the Federal Transit Administration (FTA) and City and County of Honolulu, Department of Transportation Services (DTS), seek to incorporate historic preservation principles into project planning through consultation with parties, including governmental agencies and Native Hawaiian Organizations, interested in the effects of the Honolulu High-Capacity Transit Corridor Project on historic, cultural, and archaeological resources.

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Any formal written comments are requested by September 17, 2008, and should be addressed to:

Waikīkī Hawaiian Civic Club  
Page 2  
August 25, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

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Very truly yours,

Wayne Y. Yoshioka  
Director

Enclosures:

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Cultural Resources Technical Report  
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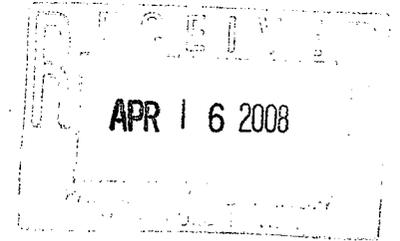
dc (F. Miyamoto)

## **Other Agency Correspondance**



U.S. DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
NATIONAL MARINE FISHERIES SERVICE  
Pacific Islands Regional Office  
1601 Kapiolani Blvd., Suite 1110  
Honolulu, Hawaii 96814-4700  
(808) 944-2200 • Fax (808) 973-2941

APR 14 2008



Mr. Darrell Sommerlatt  
Environmental Scientist  
Parsons Brinckerhoff, Inc.  
American Savings Bank Tower  
1001 Bishop Street, Suite 2400  
Honolulu, HI 96813

Dear Mr. Sommerlatt:

This letter responds to your March 26, 2008 letter regarding the proposed public transit improvements in a 23-mile travel corridor between Kapolei and the University of Hawaii at Manoa, and possibly to Waikiki, received by the National Marine Fisheries Service (NMFS) Pacific Islands Regional Office (PIRO) on April 1, 2008. In your letter, you requested information on marine listed species and their designated critical habitats, as well as proposed and candidate species, and proposed critical habitat, that may occur within the proposed action area. We provide the following information under our statutory authorities under the Endangered Species Act of 1973 (ESA), as amended [16 U.S.C. §1531 *et seq.*] and the Marine Mammal Protection Act of 1972, as amended [16 U.S.C. 1361 *et seq.*].

Your letter stated that the City and County of Honolulu, Department of Transportation Services (DTS), in cooperation with the Federal Transit Administration, is proposing the transit improvements. Parsons Brinckerhoff, Inc., who is assisting DTS with this project, originally contacted us on March 30, 2006, for information on marine listed species. On April 12, 2006, we provided a complete list of all marine protected species under NMFS's jurisdiction that may occur in waters or shorelines around the project area. Due to the amount of elapsed time since that initial coordination, you have requested an updated list of marine protected species and their designated critical habitat that may occur within/near to the proposed action area.

Based on the maps that you provided, the proposed transit route currently being analyzed in a draft environmental impact statement is entirely land-based. Portions of the proposed route and stations pass over numerous freshwater streams and occur near marine ecosystems, such as the Honolulu Harbor and the lochs of Pearl Harbor. However, it does not appear that any portions of the route will specifically transit over marine water. Therefore, no marine ESA-listed species under our jurisdiction occur in the project area. ESA-listed marine species do, however, occur in the waters surrounding the Island of Oahu. A complete list of Hawaii's marine protected species under NMFS's jurisdiction is enclosed for your review.



No additional marine species are proposed or are candidates for listing under the ESA at this time, and no critical habitat has been designated or proposed for any marine protected species around Oahu, Hawaii.

Thank you for working with NMFS to protect our nation's living marine resources. Should you have any other questions regarding this project or the consultation process, please contact Krista Graham on my staff at (808) 944-2238, or at the e-mail address [Krista.Graham@noaa.gov](mailto:Krista.Graham@noaa.gov). Please refer to consultation #: I-PI-08-671-CY.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris E. Yates", with a long horizontal flourish extending to the right.

Chris E. Yates  
Assistant Regional Administrator  
For Protected Resources

Enclosure

## HAWAII MARINE PROTECTED SPECIES

National Marine Fisheries Service, Pacific Islands Regional Office

### MARINE MAMMALS:

HAWAIIAN MONK SEAL	<i>Monachus schauinslandi</i>
HUMPBACK WHALE	<i>Megaptera novaeangliae</i>
SPERM WHALE	<i>Physeter macrocephalus</i>
BLUE WHALE	<i>Balaenoptera musculus</i>
FIN WHALE	<i>Balaenoptera physalus</i>
SEI WHALE	<i>Balaenoptera borealis</i>
NORTH PACIFIC RIGHT WHALE	<i>Eubalaena japonica</i>
COMMON DOLPHIN	<i>Delphinus delphis</i>
NORTHERN ELEPHANT SEAL	<i>Mirounga Angustirostris</i>
ROUGH-TOOTHED DOLPHIN	<i>Steno bredanensis</i>
RISSE'S DOLPHIN	<i>Grampus griseus</i>
BOTTLENOSE DOLPHIN	<i>Tursiops truncatus</i>
PANTROPICAL SPOTTED DOLPHIN	<i>Stenella attenuata</i>
SPINNER DOLPHIN	<i>Stenella longirostris</i>
STRIPED DOLPHIN	<i>Stenella coeruleoalba</i>
MELON-HEADED WHALE	<i>Peponocephala electra</i>
PYGMY KILLER WHALE	<i>Feresa attenuata</i>
FALSE KILLER WHALE	<i>Pseudorca crassidens</i>
KILLER WHALE	<i>Orcinus orca</i>
SHORT-FINNED PILOT WHALE	<i>Globicephala macrorhynchus</i>
BLAINVILLE'S BEAKED WHALE	<i>Mesoplodon densirostris</i>
CUVIER'S BEAKED WHALE	<i>Ziphius cavirostris</i>
PYGMY SPERM WHALE	<i>Kogia breviceps</i>
DWARF SPERM WHALE	<i>Kogia sima</i>
MINKE WHALE	<i>Balaenoptera acutorostrata</i>
BRYDE'S WHALE	<i>Balaenoptera edeni</i>
FRASER'S DOLPHIN	<i>Lagenodelphis hosei</i>

### SEA TURTLES:

LEATHERBACK TURTLE	<i>Dermochelys coriacea</i>
HAWKSBILL TURTLE	<i>Eretmochelys imbricata</i>
GREEN TURTLE	<i>Chelonia mydas</i>
OLIVE RIDLEY TURTLE	<i>Lepidochelys olivacea</i>
LOGGERHEAD TURTLE	<i>Caretta caretta</i>

THREATENED  
ENDANGERED

Last updated April 2008

TP 1/06-135432

DEPARTMENT OF DESIGN AND CONSTRUCTION  
**CITY AND COUNTY OF HONOLULU**

650 SOUTH KING STREET, 11<sup>TH</sup> FLOOR  
HONOLULU, HAWAII 96813  
PHONE: (808) 523-4564 • FAX: (808) 523-4567  
WEB SITE: www.honolulu.gov



MUI HANNEMANN  
MAYOR

WAYNE M. HASHIRO, P.E.  
DIRECTOR  
EUGENE C. LEE, P.E.  
DEPUTY DIRECTOR

CDA 06-135405

January 9, 2006

**MEMORANDUM**

TO: ALFRED TANAKA, P.E., ACTING DIRECTOR  
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: *for Eugene C. Lee*  
WAYNE M. HASHIRO, P.E., DIRECTOR  
DEPARTMENT OF DESIGN AND CONSTRUCTION

SUBJECT: HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT,  
ALTERNATIVES ANALYSIS AND DRAFT EIS – SCOPING  
INFORMATION PACKAGE

JAN 9 3 32 PM '06  
DTS  
TRANS PLANNING

We wish to provide comments to the Scoping Information Package dated December 5, 2005, for the subject project. Several of the fixed guideway alternative alignments reflected in the report impact corridors that major roadway rehabilitation projects are being scheduled for improvements with both City and FHWA funding. In addition, there are new roadway facilities being planned that are also along your alternative alignments.

To provide consistency with on-going planning, design, and construction efforts, we request that you and your consultants coordinate with our office regarding the following projects:

- Kapolei Parkway (Renton to N-S Road) – new roadway for which FHWA funding participation is being sought
- Salt Lake Boulevard (Maluna to Ala Liliko'i) – major roadway widening for which FHWA funding participation will be sought
- Beretania Street (Alapai Street to N. King Street) – construction contract awarded; construction anticipated to start in 2<sup>nd</sup> quarter 2006. FHWA participation obtained
- Dillingham Boulevard (Laumaka St. to Waiakamilo St.) – rehabilitation of the roadway being planned
- Kapiolani Boulevard (South to Kalakaua) – rehabilitation of the roadway is being designed utilizing FHWA funding participation

Alfred Tanaka  
Page 2  
January 9, 2006

- Kapiolani Boulevard (Waiialae Avenue to University Avenue) – rehabilitation of the roadway is being planned
- Farrington Highway (Fort Weaver Road to N-S Road) – major roadway widening planned

The above represents the major roadway projects along the fixed guideway alternative alignment. There may be other facilities that may also be impacted by the fixed guideway alternative alignments.

If there are any questions, please contact Marvin Char at 527-6381.

MC:pto

c: Department of Facility Maintenance  
Department of Planning and Permitting

**CITY AND COUNTY OF HONOLULU**

850 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813

Phone: (808) 768-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

SEP 31  
'08 OCT -2 P 1:35

MUFI HANNEMANN  
MAYOR

DEPT. OF PARKS  
& RECREATION  
C & C OF HONOLULU



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

September 25, 2008

RT9/08-280709

**MEMORANDUM**

**TO: LESTER K. C. CHANG, DIRECTOR  
DEPARTMENT OF PARKS AND RECREATION**

**FROM: WAYNE Y. YOSHIOKA, DIRECTOR**

**SUBJECT: HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT  
KEEHI LAGOON PARK - SECTION 4(F) DE MINIMIS  
DETERMINATION**

This is to request your acknowledgment that the City and County of Honolulu Department of Parks and Recreation, as the agency with jurisdiction over Ke'ehi Lagoon Park, has been informed of the U.S. Department of Transportation Federal Transit Administration's (FTA's) intent to render a Section 4(f) *de minimis* determination. The signed acknowledgment is an element that FTA requires before it can make such a determination.

As discussed during our May 22, 2008 meeting, the Department of Transportation Services (DTS), in cooperation with the FTA, is evaluating fixed-guideway alternatives that would provide high-capacity transit service on O'ahu in the travel corridor between Kapolei and the University of Hawai'i at Mānoa (UH Mānoa).

Project alternatives that include connection to Honolulu International Airport would require the placement of columns and an elevated guideway roughly following the park access road and continuing parallel to the H-1 Freeway. The enclosed visual simulations show the park entrance and the guideway along the H-1 Freeway.

The project elements would require use of approximately 1,600 square feet of the 72-acre Ke'ehi Lagoon Park for the placement of columns within an approximately 2.8-acre area that is shown on the attached figure. The project would displace the tennis courts located near the H-1 Freeway. The DTS commits to replacing the tennis courts or providing other equal recreational benefit within the park. The area under the guideway would be appropriate for parking use and the project will continue to work with your department to develop a configuration around the guideway to maintain net parking spaces.

Lester K. C. Chang  
Page 2  
September 25, 2008

It is the project's intent that your department would continue to have jurisdiction over all lands under the guideway.

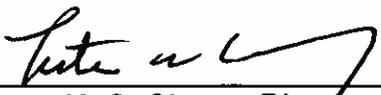
As a result of this use of the park, FTA regulations require a Section 4(f) evaluation to be conducted. Section 4(f) of the United States Department of Transportation Act of 1966 prevents FTA from approving projects that require the use of public parks, recreation areas, wildlife refuges, or lands of historic significance, unless there is no feasible or prudent alternative to the use of the at land. Ke'ehi Lagoon Park would be considered a Section 4(f) resource and the columns and overhead guideway would be a transportation use. A Section 4(f) evaluation is required to analyze the transportation use. With consideration of the above commitments for avoidance, minimization, mitigation, and enhancement, the impact to the park would not be adverse. The park's recreational features and attributes will be fully restored or replaced prior to project completion. It is FTA's intent to make a determination that the impacts to Ke'ehi Lagoon Park would be *de minimis*. This determination will satisfy the Section 4(f) requirements of this project.

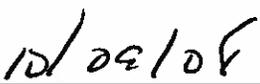
Please sign below to acknowledge that, as the official with jurisdiction over Ke'ehi Lagoon Park, you have been informed of FTA's intent to make a *de minimis* determination.

Should you have any questions regarding this matter, please contact Ms. Faith Miyamoto of the Rapid Transit Division at Local 8350.

  
WAYNE Y. YOSHIOKA

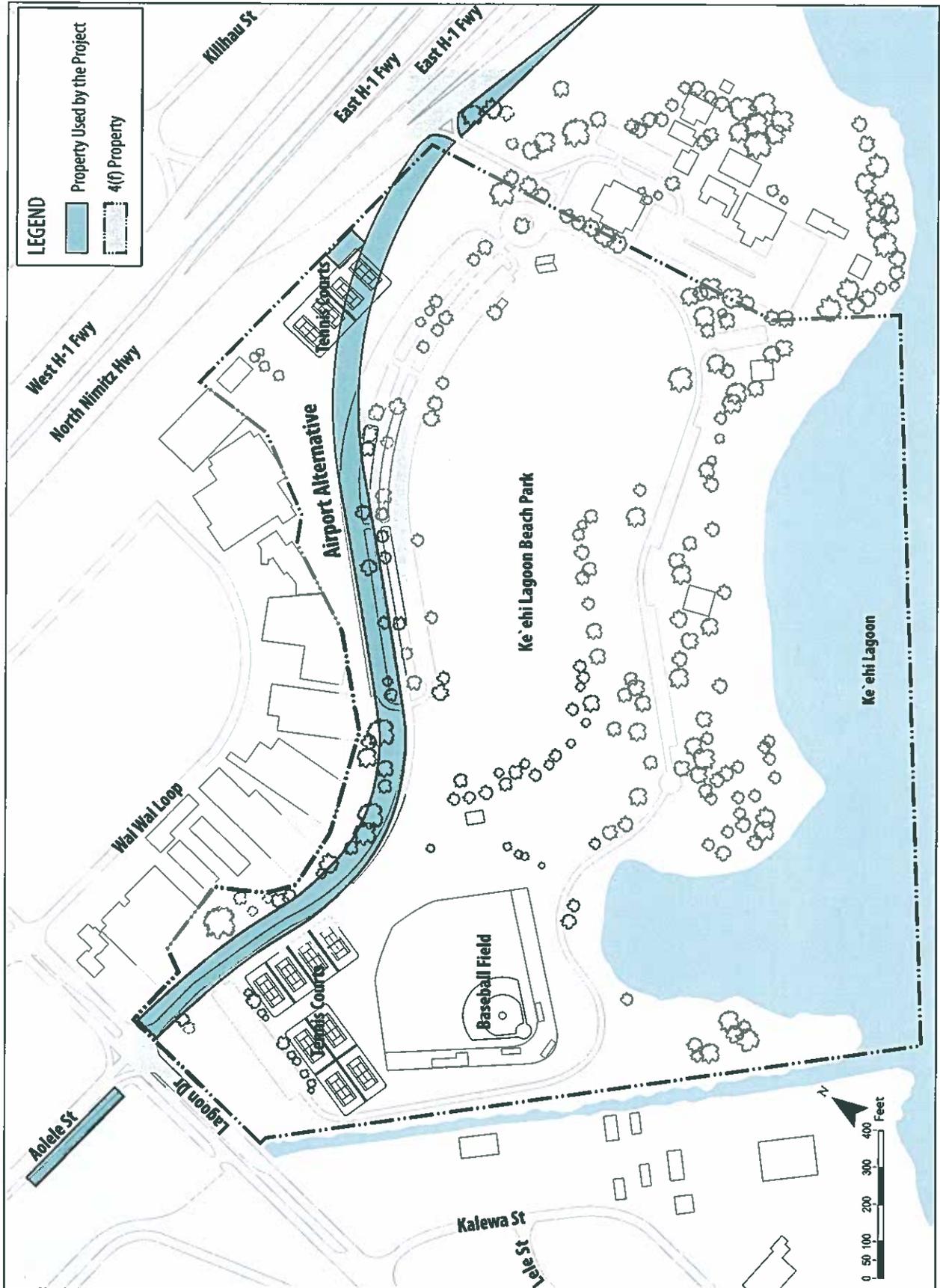
ACKNOWLEDGMENT:

  
Lester K. C. Chang, Director  
Department of Parks and Recreation

  
Date

Enclosures

cc: Mr. Ted Matley, FTA Region IX





**Sommerlatt, Darrell**

---

**From:** Hasegawa, Carol C. [chasegawa@honolulu.gov]  
**Sent:** Thursday, January 17, 2008 10:22 AM  
**To:** Sommerlatt, Darrell  
**Subject:** FW: Pruning of Exceptional Trees  
**Follow Up Flag:** Follow up  
**Flag Status:** Blue  
**Attachments:** Sommerlatt, Darrell.vcf; Pruning Permit.pdf

As an original signature of the applicate is necessary, please mail to the Division of Urban Forestry at 3902 Paki Avenue, Honolulu, Hawaii 96815

**From:** Division of Urban Forestry  
**Sent:** Thursday, January 17, 2008 10:20 AM  
**To:** 'Sommerlatt@pbworld.com'  
**Subject:** FW: Pruning of Exceptional Trees

---

**From:** Ikehara, Carolyn T  
**Sent:** Thursday, January 17, 2008 9:47 AM  
**To:** Oka, Stanley T.; Hasegawa, Carol C.; Koike, Terri-Ann K  
**Subject:** FW: Pruning of Exceptional Trees

I have attached a scanned application for pruning of Exceptional Trees. Please complete and attach proof of ISA certification and the completed Qualified Arborist Application. Contact Mr. Austin Braaten at 971-8021 should you have any questions.

---

**From:** Sommerlatt, Darrell [mailto:Sommerlatt@pbworld.com]  
**Sent:** Thursday, January 17, 2008 9:22 AM  
**To:** DPR Parks MS  
**Subject:** Pruning of Exceptional Trees

Aloha,

I am working on a transportation project for the City & County of Honolulu that may involve pruning of exceptional trees. I have found the document (<http://www.honolulu.gov/parks/rules/xceptree.htm>) but I would like to the protocol of who needs to be contact, potential paper work and assessment that may need to be done. Any information that you could provide me with would be excellent. Thank you, have a nice day,

Darrell

Darrell Sommerlatt  
Environmental Scientist  
PB Americas, Inc.  
1001 Bishop Street, Suite 2400  
Honolulu, HI 96813



**DOWNTOWN NEIGHBORHOOD BOARD NO. 13**

c/o NEIGHBORHOOD COMMISSION • CITY HALL, ROOM 400 • HONOLULU, HAWAII 96813

January 4, 2006

Mr. Kenneth Hamayasu  
Department of Transportation Services  
City and County of Honolulu  
650 S. King Street, 3rd Floor  
Honolulu, HI 96813

Re: Honolulu High-Capacity Transit Corridor Project (HRS 343 FEA-EISPN)

Dear Mr. Hamayasu:

This is to advise you, pursuant to the notice in the OEQC bulletin dated December 8, 2005, that the Downtown Neighborhood Board wishes to be a consulted party in the FEA and EISPN.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lynne Matusow".

Lynne Matusow, Chair





PEARL CITY NEIGHBORHOOD BOARD NO. 21

c/o NEIGHBORHOOD COMMISSION • 530 SOUTH KING STREET ROOM 406 • HONOLULU, HAWAII, 96813  
PHONE (808) 768-3710 • FAX (808) 768-3711 • INTERNET: <http://www.honolulu.gov>

October 1, 2008

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawaii 96813

Re: Honolulu High-Capacity Transit Corridor Project (HRS 343 FEA-EISPN)

Dear Mr. Yoshioka,

Please be advised that pursuant to the notice in the OEQC bulletin dated December 8, 2005, that the Pearl City Neighborhood Board wishes to be a consulted party in the FEA and EISPN.

Your kind attention to this matter would be greatly appreciated.

Sincerely,

 for  
Kimmo Pickard  
Chair

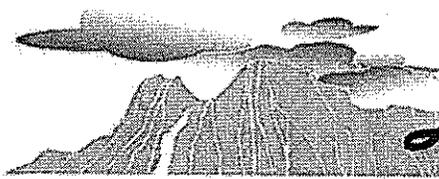
cc: Mr. Toru Hamayasu

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DIRECTOR'S OFFICE  
DEPT. OF  
TRANSPORTATION SERVICES



Oahu's Neighborhood Board system - Established 1973

RTD 244708



# Hawaii's Thousand Friends

25 Maluniu Ave., Suite 102., PMB 282 • Kailua, HI 96734 • Phone/Fax: (808) 262-0682 E-mail: htf@hawaii.net

RECEIVED  
08 JAN 14 AIO : 45

January 10, 2008

Wayne Yoshioka, Director  
Department of Transportation Services  
650 South King Street  
Honolulu, Hawai'i 96813

Dear Director Yoshioka;

Re: Honolulu Mass Transit Project: Protection of Historic Properties Pursuant to Chapter 6E, Hawaii Revised Statutes

Hawaii's Thousand Friends (HTF) hereby notifies you that it is concerned with the effect of the proposed Honolulu Mass Transit Project on historic properties and accordingly requests that, in all matters relating to the compliance of that Project with the requirements of Chapter 6E, Hawaii Revised Statutes (HRS) and implementing administrative rules, it be regarded as an "Interested person" as that term is defined in Section 13-275-2, Hawaii Administrative Rules (HAR) and be accorded all the rights of such persons under Chapter 6E, applicable administrative rules, and all other provisions of law.

With regard to all steps of the review leading to the issuance of a "determination letter" as defined in HAR § 13-275-2 and pursuant to HAR § 13-275-3, HTF notes that HAR §§ 132-275-3(e), -3(f), and -3(g) provide as follows:

- (e) The SHPD shall send its written comments on each step's submittal to the agency within the amount of time specified under each section of this chapter, or by a mutually agreed upon date. Copies of SHPD written comments will also be sent to any interested persons who have expressed concerns with the project by that point in the process. If the SHPD fails to send written comments within the set time, or by a mutually agreed upon date, then the SHPD is presumed to concur with the agency's submittal.
- (f) The SHPD shall consider interested persons' comments on any submittals' acceptability in accordance with this chapter and chapters 13-276 through 13-283. Comments must be submitted in writing to the SHPD within thirty days of the SHPD's posting a notice of "no historic properties affected" or receipt of information. The SHPD shall post notice every Friday of receipt of relevant documents and of issuance of SHPD "no historic properties affected" or receipt of information. The notice shall be posted at the SHPD office and on the SHPD's website. Should the office be closed on any Friday as a result of a holiday or some type of disaster, the information shall be posted on the

first following working day. Interested persons shall contact the SHPD to obtain copies of this notice, or to find locations of documents, should they wish to review them.

- (g) If the agency or interested persons disagree with the accuracy of the SHPD's determination and if disagreements cannot be resolved through meetings with the SHPD, an appeal may be made to the Hawaii historic places review board within thirty days of the SHPD's determination letter. An appeal is initiated by a written request to the Hawaii historic places review board within thirty days of the SHPD determination letter.

HTF specifically requests that it be afforded all the rights of an Interested Person under these and other provisions of law, including but not limited to receipt of "copies of SHPD written comments" as provided in HAR § 13-275-3(e) and of notice of "no historic properties affected" or of SHPD's receipt of information as provided in HAR § 13-275-3(f).

Thank you for your consideration,



Donna Wong  
Executive Director

# LIFE OF THE LAND

*Ua Mau Ke Ea O Ka Aina I Ka Pono*

76 North King Street, Suite 203, Honolulu, Hawai'i 96817

Phone: (808) 533-3454 \* E-Mail: [henry@lifeoftheland.net](mailto:henry@lifeoftheland.net)

---

January 8, 2006

Attention: Honolulu High-Capacity Transit Corridor Project  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3rd Floor  
Honolulu, HI, 96813  
[www.honolulutransit.org](http://www.honolulutransit.org)

Ms. Donna Turchie  
Federal Transit Administration, Region IX  
201 Mission Street, Suite 2210  
San Francisco, CA 94105  
[Donna.Turchie@fta.dot.gov](mailto:Donna.Turchie@fta.dot.gov)

cc:  
Alfred Tanaka  
Acting Director of DTS  
[atanaka@honolulu.gov](mailto:atanaka@honolulu.gov)

Toru Hamayasu  
Chief Planner at DTS  
[thamayasu@honolulu.gov](mailto:thamayasu@honolulu.gov)

[info@honolulutraffic.com](mailto:info@honolulutraffic.com)  
[oeqc@doh.hawaii.gov](mailto:oeqc@doh.hawaii.gov)

Aloha,

Life of the Land is Hawai'i's own environmental and community action group advocating for the people and the 'aina since 1970. Our mission is to preserve and protect the life of the land through sustainable land use and energy policies and by promoting open government through research, education, advocacy, and litigation.

The Council on Environmental Quality (CEQ) publishes analysis of what is required within a federal Environmental Impact Statement (See: CEQ Top 40 NEPA Questions: <http://ceq.eh.doe.gov/nepa/regs/40/40p3.htm>). Specifically, the discussion on alternatives is very, very important. In previous iterations of proposals to expand transportation options of O`ahu, short shrift was given to these federal requirements. (Specifically, please review: CEQ Top 40 NEPA Questions: 1a. Range of Alternatives, 1b. How many alternatives have to be discussed when there is an infinite number of possible alternatives?, 2a. Alternatives Outside the Capability of Applicant or Jurisdiction of Agency, 2b. Must the EIS analyze alternatives outside the jurisdiction or capability of the agency or beyond what Congress has authorized? )

Transportation Expansion, Population Growth, and New Developments are intertwined. In it impossible to think about one without seeing how it impacts the others. Sometimes it occurs in intended ways, when all three are planned together. Sometimes it occurs in unintended ways, when government agencies approve new developer-initiated sprawl because the newly expanded transportation system can handle additional cars.

Hawai'i's government is urban, and has not been able to control growth in outlying areas, nor to protect prime agricultural lands. Will the various transportation plans lead to run-away growth?

If the population rises by 2% a year, then the population doubles every 36 years. Thus a average 2% population growth rate will mean that O'ahu's population in 2200 will be 32,000,000. Absurd perhaps, but shouldn't we have time to talk about carrying capacity, development without growth, and other big-picture items at some time, rather than putting it off for a future generation?

Life of the Land would like to see a realistic analysis of how alternative scenarios for enhanced modes of transportation play out on the development and population fronts.

The analysis should include not merely growth in general, but the types of growth (gentleman farms, golf courses, affordable houses, homelessness), that are reasonable to expect.

There are areas of the island, such as surf sites/windsurfing sites/ personal water crafts/jet skis/snorkeling/fishing/tourism/ sites that are under threat from too many competing uses. How will the growth in transportation/population/development affect those areas which can not be expanded upon?

Many people want to bicycle, but fear bicycle-car interactions. One of our Board Members was hit from behind by a drunk driver in the downtown area. Will the proposed alternatives increase or decrease the ability of bicyclists to navigate downtown and in other areas? Will the transportation plan work in sync with, parallel with, or ignore the Honolulu Bicycle Master Plan? Are vehicle-pedestrian interactions more or less likely under each alternative?

Will the building of new transportation projects lead to greater homogenization of communities, where each one look the same?

Why were the proposed routes selected? Would two or three routes work better than one. Airport/Aloha Stadium; UH/Waikiki; Ewa/UH? How would each route be measured to determine what impact it would have?

What would be the impact from an Airport/Aloha Stadium Route? What would be the rider-ship from a line providing service within the Honolulu International Airport and ending at Aloha Stadium? Would such a line provide better security at the airport, allow for faster and more efficient airport service, and decrease the cost of people having to park at the airport? If the rail system were to occupy two existing lanes at the airport, providing high speed transportation to Aloha Stadium, with its abundant parking, would this free up the highways for other uses?

Would providing three local rail or bus lines (Kapolei, Airport/Aloha Stadium, Waikiki/UH) connected by one very express line with just 4-7 total stops provide better service?

What would be the impact of developing a high-speed coastal system on-grade/below grade system with just 6 stops: Kapolei, Ewa, Airport, Sand Island, Ala Moana, Ala Wai Golf Course? Couldn't this go on existing right-of-ways?

What if the car pool lane had a minimum speed of 65 mph and a maximum speed of 75 mph, and was restricted to buses and car-pools of 4 people or more? Wouldn't the sight of a largely empty but fast moving traffic encourage greater car-pooling?

How will the proposed system be powered? By new fossil fuel power plants and ugly transmission lines, or distributed renewable energy? Please explain this in detail.

How will view-planes (mountains, ocean) be affected? The Blue View may be defined as those who are able to see the ocean from where they live and/or work. The Mountain View may be defined as those who are able to see mountains from where they live and/or work. How will proposed infrastructures affect these aesthetic values?

Will the new line connect major shopping centers and governmental facilities (Pearl Ridge Shopping Center, Aloha Stadium, Aloha Tower, UH Medical School, UH), or will the route go to proposed new developments? Are the particular routes being chosen to maximize particular future developments?

Through what types of communities will the new line be built (income, race, etc).

Mahalo

Henry Curtis  
Executive Director

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

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 788-8305 • Fax: (808) 523-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



WAYNE Y. YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

September 29, 2008

RT9/08-281093

Ms. Elizabeth S. Merritt  
Deputy General Counsel, Law Department  
National Trust for Historic Preservation  
1785 Massachusetts Avenue N.W.  
Washington, D.C. 20036

Dear Ms. Merritt:

Subject: Honolulu High-Capacity Transit Corridor Project

As requested by the Hawaii State Historic Preservation Division (SHPD), enclosed is one (1) DVD copy of the documents that have been sent to the SHPD as part of our coordination under the National Environmental Policy Act of 1966, as amended and Section 106 of the National Historic Preservation Act. The DVD includes the Purpose and Need and Alternatives chapters of the Draft Environmental Impact Statement (EIS), along with electronic copies of the Archaeological Resources, Cultural Resources, and Historical Resources Technical Reports.

Project staff is currently in the process of contacting all Section 106 consulting parties requesting to update agencies and organizations on the Project's status as well as discuss questions and/or concerns about archaeological, cultural, and/or historic resources.

Should you have any questions or need further information regarding this matter, please contact Ms. Faith Miyamoto at (808) 768-8350.

Very truly yours,

A handwritten signature in black ink, appearing to read "Wayne Y. Yoshioka", is written over a horizontal line.

WAYNE Y. YOSHIOKA  
Director

Enclosure

cc: Dr. Pua Aiu, Administrator, Department of Land and Natural Resources  
State Historic Preservation Division  
Ms. Kiersten Faulkner, Executive Director  
Historic Hawaii Foundation  
Ms. Blythe Semmer, Office of Federal Agency Programs,  
Advisory Council on Historic Preservation

R710/08-282859

**NATIONAL  
TRUST  
FOR  
HISTORIC  
PRESERVATION**

October 6, 2008

Mr. Wayne Yoshioka, Director  
Dept of Transportation Services  
City and County of Honolulu  
650 South King Street, 3rd Floor  
Honolulu, Hawaii 96813

Re: Honolulu High-Capacity Transit Corridor Project

Dear Mr. Yoshioka,

The National Trust for Historic Preservation is concerned with the potential adverse effects on historic properties associated with the High-Capacity Transit Corridor project on the island of Oahu. While we recognize that expanding transit alternatives is essential to reducing congestion in and around Honolulu; the magnitude of this project puts the integrity of many sites of architectural and archaeological significance at risk. As such, the National Trust requests to participate in the review process as a "consulting party" under Section 106 of the National Historic Preservation Act (NHPA), pursuant to 36 C.F.R. § 800.2.(c)(5) and 800.3(f)(3).

We appreciate the efforts by the Department of Transportation Services to analyze adverse effects on historic properties for a project of such grand scale. We do have concerns, however, that the definition of "adverse effect" was improperly applied in the Historical Resources Technical Report, as it indicates only six adverse effects to historic resources associated with this twenty-mile-long project. In addition, given the magnitude of the undertaking, it is improper to assess effects solely on a parcel by parcel basis. Rather, it essential that indirect, secondary, and cumulative effects be taken into account in a more holistic manner. The National Trust for Historic Preservation also strongly supports the request by the Historic Hawaii Foundation to include extensive mitigation measures as this project proceeds.

In addition to our concerns about the preliminary assessment of effects, we received a letter today raising a new issue - the announced intention to invoke 36 C.F.R. § 800.8(c) in order to use the process and documentation prepared under the National Environmental Policy Act

1785 Massachusetts Avenue, NW Washington, DC 20036  
P 202.588.6000 F 202.588.6038 E info@nthp.org www.PreservationNation.org

(NEPA) for purposes of Section 106. We have questions about whether § 800.8(c) is properly invoked in this case, and we would like more information from the Advisory Council on Historic Preservation (ACHP) as to whether § 800.8(c) is applicable here. For example, does the City and County of Honolulu qualify as an "agency official" under § 800.2(a), for purposes of invoking this regulation? Does a notice issued at this point in the ongoing consultation process constitute notice "in advance" under the terms of § 800.8(c)? This provision in the Section 106 regulations is not used very often by federal agencies, so we are less familiar with the ACHP's expectations as to how it typically operates. We would be open to proceeding under § 800.8(c), but only if the ACHP will be actively involved in the consultation and determines that the regulatory criteria are met.

#### Interests of the National Trust

The National Trust for Historic Preservation was chartered by Congress in 1949 as a private nonprofit organization for the purpose of furthering the historic preservation policies of the United States and facilitating public participation in the preservation of our nation's heritage. 16 U.S.C. § 468. With the support of our 280,000 members nationwide, the National Trust works to protect significant historic sites and to advocate historic preservation as a fundamental value in programs and policies at all levels of government. The Trust has nine regional and field offices around the country, including a Western Office in San Francisco, which is specifically responsive to preservation issues in Hawaii.

The Trust has a particular interest in enforcing federal agency compliance with the National Historic Preservation Act, since the Chairman of the Trust has been designated by Congress as a member of the federal Advisory Council on Historic Preservation. *Id.* § 470i(a)(8). In addition, the Trust has a long history of involvement in transportation issues, both at the national policy level and with respect to individual undertakings, including enforcement of Section 4(f) of the Department of Transportation Act, 49 U.S.C. § 303, which we believe is applicable to this project. We think the National Trust could play a constructive role in the consultation process for the proposed undertaking, by bringing our national perspective and experience to the table.

Mr. Wayne Yoshioka  
October 3, 2008  
Page 3

Please include both of the following representatives of the National Trust on your list of consulting parties, and for the distribution of all notices and information prepared under Section 106, NEPA, and Section 4(f):

Elizabeth Merritt, Deputy General Counsel  
National Trust for Historic Preservation  
1785 Massachusetts Ave. NW  
Washington, DC 20036  
[betsy\\_merritt@nthp.org](mailto:betsy_merritt@nthp.org)  
202-588-6035

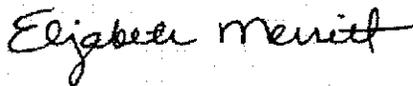
Brian R. Turner, Legal Fellow  
National Trust for Historic Preservation  
5 Third Street, Suite 707  
San Francisco, CA 94103  
[brian\\_turner@nthp.org](mailto:brian_turner@nthp.org)  
415-947-0692

Thank you for including us in the review process; we look forward to participating as the consultation moves forward for the proposed construction of the Honolulu High-Capacity Transit Corridor on the island of Oahu, Hawaii.

Sincerely,



Brian R. Turner  
Legal Fellow, Western Office



Elizabeth S. Merritt  
Deputy General Counsel

cc: Leslie T. Rogers, Regional Administrator, Region IX, FTA  
Raymond Sukys, Director of Planning & Program Development,  
Region IX, FTA  
Christopher Van Wyk, Office of Planning & Environment, FTA  
Julie Atkins, Office of Planning & Environment, FTA  
Blythe Semmer, ACHP  
Kelly Fanizzo, ACHP  
Elaine Jackson-Retondo, NPS

Mr. Wayne Yoshioka  
October 3, 2008  
Page 4

Laura Thielen, SHPD  
Nancy A. McMahon, SHPD  
Astrid Liverman, SHPD  
Kiersten Faulkner, Historic Hawai'i Foundation

TP, 2/05 - 131206

LINDA LINGLE  
GOVERNOR OF HAWAII



GENEVIEVE SALMONSON  
DIRECTOR

STATE OF HAWAII  
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

235 SOUTH BERETANIA STREET  
SUITE 702  
HONOLULU, HAWAII 96813  
TELEPHONE (808) 586-4185  
FACSIMILE (808) 586-4186  
E-mail: oeqc@health.state.hi.us

December 6, 2005

Alfred Tanaka  
Department of Transportation Services  
650 South King St. 3<sup>rd</sup> floor  
Honolulu, Hawaii 96813

Attn: Kenneth Hayamasu

Dear Mr. Tanaka:

Subject: Environmental Impact Statement (EIS) Preparation Notice  
**Honolulu High-Capacity Transit Corridor Project**

We have the following comments to offer:

Acronyms/glossary list: A list of acronyms, abbreviations and a glossary of terms would be useful for the reviewer. Please include such a list in the draft EIS.

Aesthetics: In this (or another) section of the draft EIS include a discussion of landscaping plans. Note that HRS 103D-408 requires the use of native Hawaiian flora whenever and wherever possible. For your treatment of visual impacts include photos or renderings of proposed facilities superimposed onto photos taken from existing vantage points.

Consultations: Send a copy of the EISPN to other community groups besides those listed in section 4.0, such as Hawaii's Thousand Friends, Sierra Club and the Historic Hawaii Foundation. If affected trees in the corridor are exceptional or may be relocated, consult with The Outdoor Circle. Have you received any correspondence to date about the project? If so, include copies in the EIS.

Alternative alignments:

Give a comparison of the current proposed alignments to those considered in the 2002 *Primary Corridor Final Supplemental EIS* and explain significant differences.

Is alternative 4d the only one with a Waikiki spur? The lack of a Waikiki spur in the others should be fully explained in the alternatives section in the draft EIS.

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STATE OF HAWAII

Alfred Tanaka  
December 6, 2005  
Page 2

Hazardous Materials: In this section of the draft EIS include remediation measures.

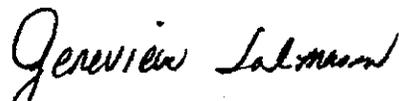
Permits and approvals: In the draft EIS be sure to include the status of each. For those yet to be filed, list the expected date of application.

Timeframe: What are the anticipated start and end dates of this project?

Funding: In the draft EIS disclose Federal, state and county funds involved or funding percentages from these sources.

If you have any questions call Nancy Heinrich at 586-4185.

Sincerely,



GENEVIEVE SALMONSON  
Director

c: Mark Sheibe, Parson Brinckerhoff  
David Pendleton, Office of the Governor



YMK  
TP5/07-007259  
BARRY FUKUNAGA  
INTERIM DIRECTOR

COMMISSION ON TRANSPORTATION  
STATE OF HAWAII  
DEPARTMENT OF TRANSPORTATION  
869 PUNCHBOWL STREET  
HONOLULU, HAWAII 96813-5097

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PETE PASCUA  
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DEPARTMENT OF TRANSPORTATION  
COMMUNICATION SERVICES

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RECEIVED

May 2, 2007

Mr. Melvin N. Kaku  
Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3rd Floor  
Honolulu, HI 96813

Dear Mr. Kaku,

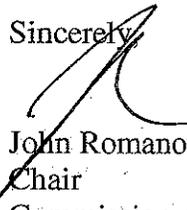
Subject: Honolulu High-Capacity Transit Corridor Project

The future of Hawaii's mobility and economic sustainability is a concern to the members of the Commission on Transportation. Therefore, the Commission on Transportation recommends that the draft EIS for the Honolulu High-Capacity Transit Corridor Project include the entire transit corridor from West Kapolei to the University of Hawaii and Waikiki. We also recommend that the draft EIS include an alignment providing service to the Honolulu International Airport, Pearl Harbor and Hickam Airforce Base. We believe that a fixed guideway transit alignment serving the Honolulu Airport area would be advantageous due to the fact that Pearl Harbor and Hickam Airforce Base are major employment hubs.

The Commission also recommends that the draft EIS clearly and concisely disclose all costs including right-of-way acquisition for the entire transit corridor as well as the long-term operation costs to maintain a transit system. Finally, the Commission believes that the draft EIS should include an evaluation of traffic conditions and recommend measures to address traffic impact at all locations where proposed construction for the Honolulu's High-Capacity Transit Corridor Project intersects or affects the State highways system.

Thank you for your consideration.

Sincerely,

  
John Romanowski  
Chair  
Commission on Transportation

Cc: Barry Fukunaga  
Brennon Morioka



TP 135139

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January 4, 2006

Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, HI 96813

Attention: Honolulu High-Capacity Transit  
Corridor Project

Aloha,

Thank you for the opportunity to provide input into this important public project.

Based upon the information presented at the scoping meetings, The Outdoor Circle submits the following comments:

**Historic Review**

All mature trees potentially impacted by the project should be assessed--particularly those over 50 years old.

**Visual**

Diamond Head must be specified as a landmark that must be considered...not simply lumped in with "others."

The EIS must address visual impacts of transit stations, power sources, all infrastructure and construction.

**Financing Options**

More information is needed on the scope of possible advertising and what, if any, enabling law changes would be necessary.

**Process**

How can a preferred alternative be selected before knowing the environmental impacts of all primary proposals?

**Public Involvement**

Why no open forums during scoping? The methods you are using limit public discussion and interaction. A community consensus cannot possibly be reached solely by individuals submitting written comments. It appears the process was devised to prevent public discussion, to block confrontation, and to avoid having transit planners/government officials publicly respond to inquiries.

**Alternative 4B**

What will a Kapiolani Park station facility look like? What will be the elements of such a station and where would it be constructed?

**Overall Visual Impacts**

Our organization watches after Hawaii's scenic environment. We are deeply concerned about the potential loss of view planes from any transit system and the infrastructure that supports it.

TRANS PLANNING  
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We insist that the EIS include detailed descriptions and assessments of the lost view planes, the value of those view planes and the mitigation for their loss to the Transit Project.

**Consulted Party**

We request to be named as an official "consulted party" in this endeavor.

**Response to Comments**

Our interpretation of the State of Hawaii Office of Environmental Quality rules is that the box on the online comment form asking whether the commenting party "...would like a reply." is irrelevant. It does not release the City and/or its contractors from responding to every comment received during the public comment periods required under State and Federal law. OEQC rules require that individuals receive a response to their comments. This matter was challenged and adjudicated by the Environmental Council on May 12, 2004. In a memo dated 10/19/04, OEQC specifically states that a proposed rule regarding "comment bombing" and the previous amendment of HAR Section 11-200-22(d) be rescinded. Therefore, the box that implies people can waive their right to a response is inappropriate and violates OEQC rules.

Please respond to these and all future comments provided by our organization, as required.

Mahalo.

Respectfully,



Bob Loy  
Director of Environmental Programs  
The Outdoor Circle  
1314 South King Street, Suite 306  
Honolulu, Hawaii 96814  
(808) 593-0300

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