



Mr. Brian Gibson
Executive Director
O'ahu Metropolitan Planning Organization
attn: ORTP2040
707 Richards Street, Suite 200
Honolulu, Hawaii 96813

Via email to: OahuMPO@OahuMPO.org

RE: Comments on Draft O'ahu Regional Transportation Plan 2040

Dear Mr. Gibson:

Historic Hawai'i Foundation is providing review and comment on the draft O'ahu Regional Transportation Plan 2040 (ORTP) as it relates to potential effects on historic properties.

Historic Hawai'i Foundation (HHF) is a statewide organization established in 1974 to encourage the preservation of sites, buildings, structures, objects and districts that are significant to the history of Hawai'i. HHF is a consulting party to the Federal Highway Administration (FHWA) and its state and local partners pursuant to the implementing regulations of the National Historic Preservation Act at CFR 36 Part 800.2(c)(5) as an organization with a demonstrated interest in and a concern for effects on historic properties.

All federally-funded or permitted projects are subject to Section 106 of the National Historic Preservation Act, which requires that federal agencies identify potential effects to historic properties and develop measures to avoid, minimize and mitigate adverse effects. Projects cannot proceed until the Section 106 process is complete and any adverse effects are resolved.

We also note that Section 4F of the Department of Transportation Act is applied to transportation projects, which in turn requires "feasible and prudent alternates" to the "use" of a historic resource.

The draft ORTP includes mid- and long-range plans for transportation projects to address congestion mitigation, modernization, transit and system maintenance. The fiscally-constrained plan includes cost estimates for planning purposes for each project.

Several of the listed projects appear to affect known historic properties. Specifically, in the 'Ewa area, there are at least five projects that would use and adversely affect the historic O'ahu Rail and Land Company (OR&L) right of way, which is listed on the National Register of Historic Places, or the associated OR&L Base yard, listed on the Hawai'i Register of Historic Places.

It is important to note that most of the OR&L right of way is also subject to the requirements of a deed transfer on June 5, 1980, conveying the OR&L Right-of Way (ROW) to the Hawai'i Department of Transportation (HDOT) from the General Services Administration: The written authorization of FHWA and the written approval of the State Historic Preservation Officer (SHPO) are required for "all licenses, permits, or easements authorizing the use or occupancy of the 40'

railroad right-of-way.” Since FHWA authorization is considered a federal action, requirements under NEPA, Section 106, 4F and other federal environmental laws must be fulfilled for any use of the ROW, even if the transportation project itself is not a federal undertaking.

In practice, this means that the budgets, timeline and project management considerations should include sufficient measures to comply with these laws. In planning the location and design of any transportation facility, the agency needs to consider prudent and feasible alternatives to the use or adverse effect on a historic resource, and ensure that the budget is adequate to include the treatment measures.

For the OR&L, this may mean utilizing existing crossings, as new crossing approvals may be limited, or including grade-separated crossings over or under the ROW to avoid impacts to contributing features of the historic property. Alternative locations to avoid impacts to the base yard should also be included.

We note the following projects appear to threaten the OR&L-related historic resources and therefore need greater scrutiny and possible revision to the location and/or design:

- Project 206: Kualakai Parkway Extension from Kapolei Parkway to Roosevelt Avenue appears to go through the Hawaiian Railway Society Museum and Base yard
- Project 304: Kualakai Parkway Widening from three to six lanes would also affect the HRS Museum and Base yard.
- Project 301: Extend Hanua Street to Kalaeloa Harbor would introduce a new four-lane roadway across the OR&L tracks and right of way.
- Project 302: Kalaeloa Boulevard Widening would expand the crossing on the OR&L right of way.
- Project 251: Fort Barrette Road Widening would expand the crossing on the OR&L right of way.

In addition to the concern for the OR&L-associated historic properties, Historic Hawai'i Foundation is also concerned with projects could affect historic properties in other locations on O'ahu, such as:

- Project 201: Kamehameha Highway from Hale'iwa to Kahalu'u. Hale'iwa is a special design district and includes numerous historic buildings, parks and bridges adjacent to Kamehameha Highway.
- Project 506: System Preservation projects note “bridge replacement/rehabilitation” as a goal.

In 2013, HDOT and FHWA completed an inventory and assessment of all 708 state- and county-owned bridges and culverts built before 1968 to determine which are eligible for listing on the Hawai'i and National Registers of Historic Places. The Historic Bridge Inventory & Evaluation found that 137 bridges on O'ahu are either listed on or eligible for individual historic designation, and another 21 are eligible as contributing features to the Pali Highway Bridge District.

Of those, 72 bridges are designated “high preservation value,” with the clear intention to preserve and rehabilitate the bridges following the Secretary of Interior’s Standards for the Treatment of Historic Properties and to prioritize these bridges for preservation treatment.

The ORTP projects should include sufficient funding for bridge rehabilitation that includes historic preservation standards. This may involve such items as seismic retrofits, custom-designed and tested railings, separate bridges to accommodate increased lanes (so the cross-section is split between a historic and new bridge to preserve the historic property), or other appropriate treatment options.

HHF believes that these measures will provide the agencies with the tools need to ensure the structural safety and reliability of the bridges for transportation while simultaneously retaining historic features and character, supporting community land use and design goals, and improving efficiency and project delivery for capital improvements.

Thank you for the opportunity to provide comment on the draft O’ahu Regional Transportation Plan 2040. We look forward to seeing the final version address these concerns.

Very truly yours,

A handwritten signature in cursive script, reading "Kiersten Faulkner".

Kiersten Faulkner, AICP
Executive Director