



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

Office of the Air Traffic Organization
Western Service Area

2200 South 216th Street
Des Moines, Washington 98198-6547

February 24, 2021

Mr. Alan Downer
Administrator
State Historic Preservation Division
601 Kamokila Boulevard
Suite 555
Kapolei, HI 96707
via: Hawaii Cultural Resources Information System (HICRIS)

Subject: Section 106 Consultation Initiation for the Proposed New Special Area Navigation Visual Approach Procedure to Runway 08 at Hilo International Airport, Hilo, Hawaii

Dear Mr. Downer:

The Federal Aviation Administration (FAA) is proposing to implement a new *Special Area Navigation (RNAV) Visual Runway (RWY) 08* approach flight procedure at Hilo International Airport (PHTO). The *Special RNAV Visual RWY 08* (undertaking) is for proprietary use by Southwest Airlines. The purpose of the undertaking is to improve efficiency of air traffic operations and to prevent unstable approaches and Enhanced Ground Proximity Warning System (EGPWS) events due to surrounding terrain. The FAA has determined the proposed *Special RNAV Visual RWY 08* approach flight procedure project is considered the undertaking subject to review under Section 106 of the National Historic Preservation Act of 1966 (NHPA) (16 U.S.C. § 470 et seq.) and its implementing regulations at 36 CFR part 800. The undertaking and associated activities are also subject to the National Environmental Policy Act (NEPA), and the FAA has initiated preparation of a documented categorical exclusion to meet its regulatory obligations. The FAA intends to complete Section 106 consultation in conjunction with the NEPA process.

The purpose of this letter is to initiate consultation under Section 106 of the NHPA, present the FAA's findings, and solicit comments from the State of Hawaii State Historic Preservation Division (SHPO) on this undertaking. Also, part of the Section 106 review of the undertaking, the FAA has determined an appropriate Area of Potential Effect (APE), the efforts for identification of historic properties within the proposed APE, and the methodology for assessing potential effects of the undertaking to historic properties. With your agreement, the FAA would like to address the steps in the Section 106 process in this letter, as provided by 36 CFR §800.3(g).

The Proposed Undertaking

The proposed *Special RNAV Visual RWY 08* approach flight procedure was submitted by the Southwest Airlines Safety Department and Part 119 Chief Pilot and would prevent unstable approaches and EGPWS events when RWY 08 is in use. This flight procedure is considered a “special” or private procedure for Southwest Airlines’ use. Southwest Airlines estimates approximately six flights per day of Boeing 737 aircraft would utilize the proposed flight procedure. The proposed flight procedure is described below.

Special RNAV Visual RWY 08

Aircraft would join the proposed approach flight procedure from either of the two feeder routes: the HONMU feeder route and the PUUEO feeder route. From the north, aircraft arriving at PHTO airport would join at the HONMU Waypoint (WP) at or above an altitude of 4,000 feet Mean Sea Level (MSL) (approximately 3,917 feet Above Ground Level [AGL]). Aircraft on the HONMU feeder route would continue south to ONMEA WP, which has an altitude restriction of at or above an altitude of 2,400 feet MSL (approximately 1,749 feet AGL). From the northeast, arriving aircraft would join at the PUUEO WP at or above an altitude of 4,000 feet MSL (approximately 4,000 feet AGL). The PUUEO WP is located over water. Aircraft would then continue southwest to ONMEA WP, which has an altitude restriction of at or above an altitude of 2,400 feet MSL (approximately 1,749 feet AGL). From the OMNEA WP, aircraft would continue south to the WAIAU WP with an altitude restriction of at or above an altitude of 1,800 feet MSL (approximately 1,297 feet AGL). Aircraft would continue south to WSKRA WP with an altitude restriction of at or above an altitude of 970 feet MSL (approximately 718 feet AGL). Aircraft would then head east to WYLOA WP with an altitude restriction of at or above an altitude of 500 feet MSL (approximately 477 feet AGL), and would then land RWY 08. **Figure 1** depicts the proposed approach flight procedure.

Figure 2 depicts the proposed approach flight procedure in the Terminal Area Route Generation, Evaluation, and Traffic Simulation (TARGETS) procedure design tool. The yellow line represents the proposed series of waypoints that aircraft fly to, or fly by, as described above. Minimum altitudes, represented in feet MSL, are also indicated in the figure.

Figure 1. Proposed Special RNAV Visual RWY 08 Approach Flight Procedure
(Not to scale)

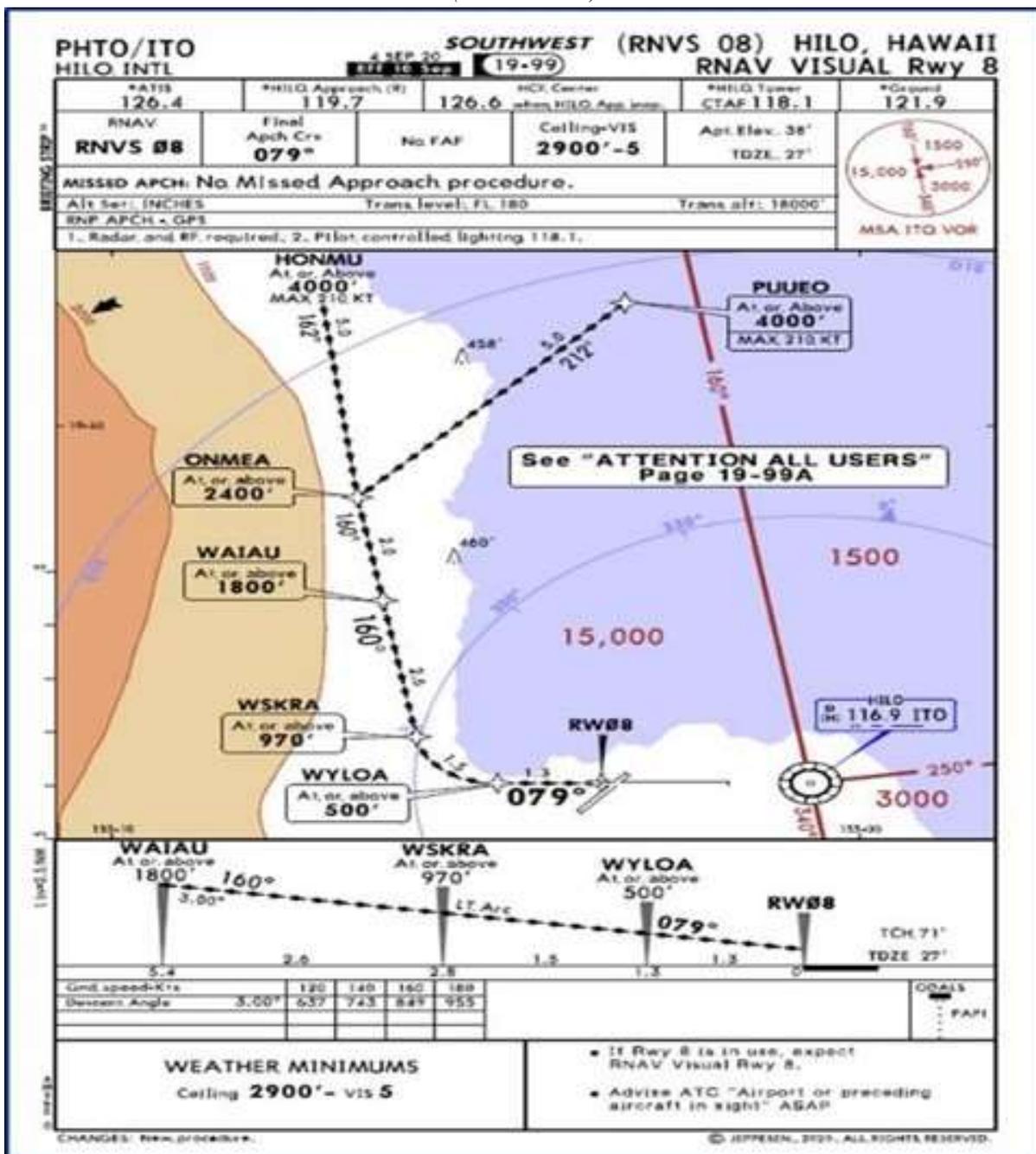
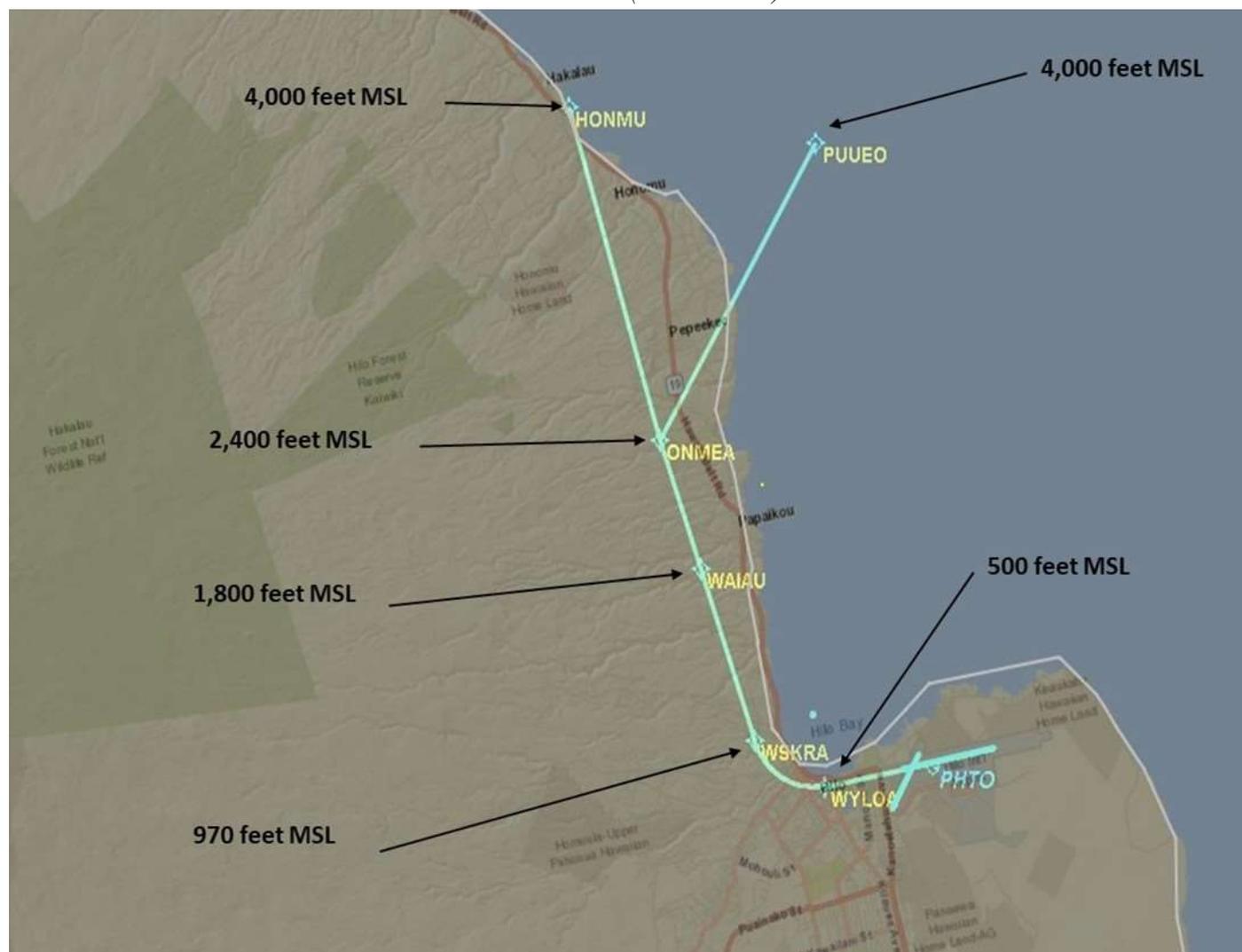


Figure 2. Proposed Special RNAV Visual RWY 08 Approach Flight Procedure (yellow line) as Shown in TARGETS (Not to scale)



Definition of the Area of Potential Effect

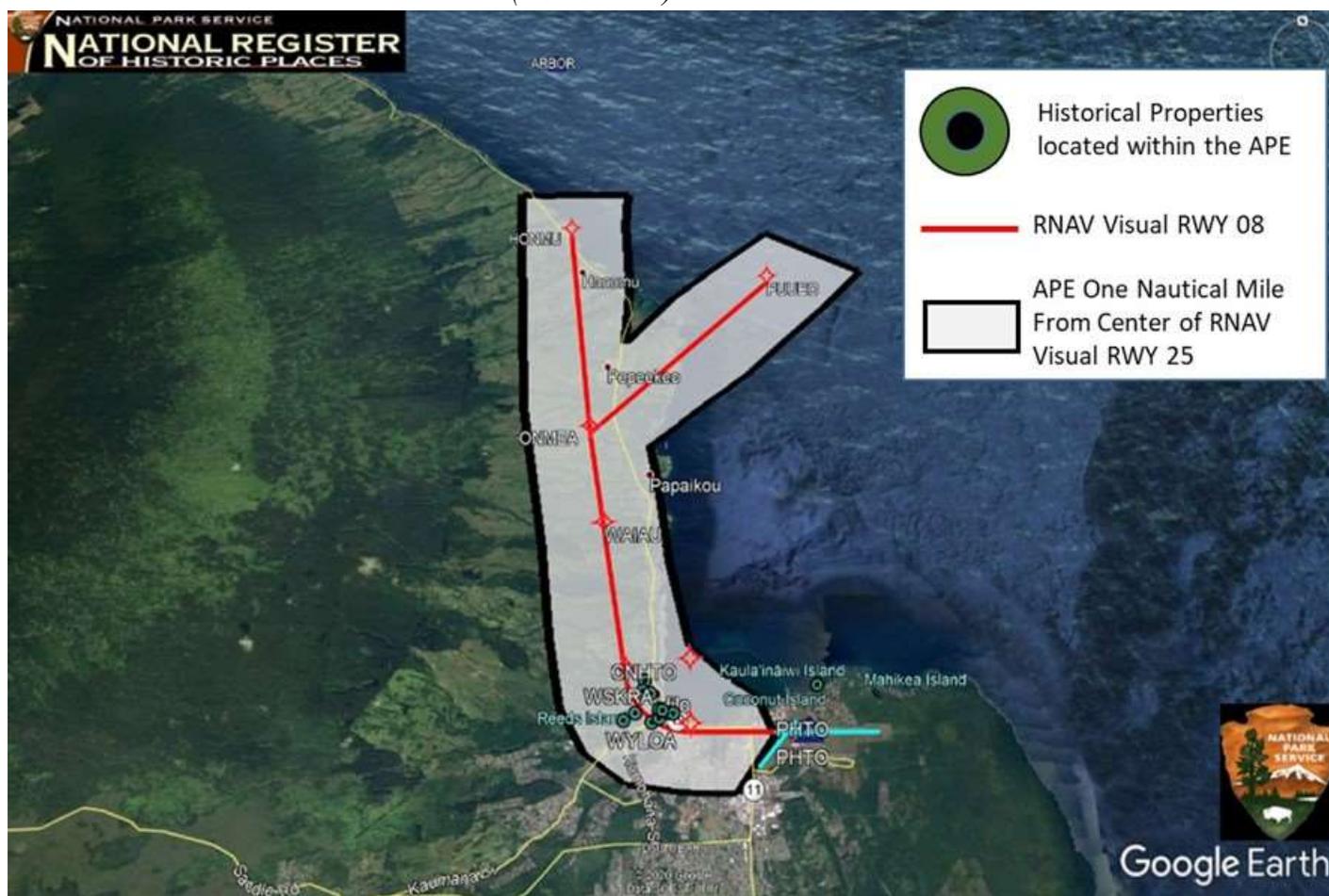
Section 106 regulations define the APE as the geographic area or areas within which an undertaking may directly or indirectly cause alteration in the character or use of historic properties, if any such properties are present. "Effects" are further defined, by the regulations, as alterations to the characteristics of a historic property qualifying it for inclusion in, or eligibility for, the National Register of Historic Places (National Register). The APE is influenced by the scale and nature of the undertaking and may vary for different kinds of effects caused by the undertaking. See 36 CFR § 800.16(d).

Because this undertaking does not require land acquisition, construction, or other ground disturbance, there would be no direct physical effects to historic resources and potential effects are limited to indirect effects from aircraft overflights. For this undertaking, the FAA proposes to

delineate an APE based on two factors. First, the APE includes the geographical area that would contain the proposed *Special RNAV Visual RWY 08* approach flight procedure. Secondly, the boundary of the APE would be based on the dispersion of current flight track data of aircraft on the *Special RNAV Visual RWY 08* approach flight procedure.

Figure 3 depicts the location of the proposed *Special RNAV Visual RWY 08* approach flight procedure contained within the boundaries of the proposed APE. The boundaries of the APE (black) are defined as an area of one nautical mile on either side of the flight procedure centerline.

Figure 3. Proposed *Special RNAV Visual RWY 08* Within the Proposed APE
(Not to scale)



Proposed Methodology for Determination of Effects

Under the NHPA, effects to historic properties and other cultural resources are evaluated. Federal agencies take into account the likely nature and location of historic properties within areas that may be affected, and the nature and extent of potential effects on historic properties. An undertaking would have an effect on a historic property if it altered the characteristics

qualifying that property for the National Register. Such effects are considered “*adverse*” if they would diminish the integrity of a property’s significant historic features (including its setting, provided the setting is a contributing factor to the property’s historic significance).

For this undertaking, no land acquisition, construction, or other ground disturbance would occur. Implementation of the undertaking would involve a new aircraft flight procedure, and would not include any project components that would touch or otherwise directly affect the ground surface. Therefore, potential effects are limited to effects from aircraft overflights, primarily noise and visual effects.

The FAA proposes to assess the effects to historic resources within the proposed APE that would change the character of a property’s use or physical features within the property’s setting that contribute to its historic significance, or introduce audible, or visual elements that would diminish the integrity of the property’s significant historic features (including its setting, provided that the setting has been identified as a contributing factor to the property’s historical significance).

The analysis for potential adverse effects within the APE considers the change in aircraft noise exposure level measured in decibels (dB). According to FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, dated July 16, 2015 (FAA Order 1050.1F), the FAA’s noise screening analysis for this undertaking would include identifying any “significant” or “reportable” noise increases. The FAA’s noise guidelines for compliance with NEPA define a significant impact as an increase of a DNL¹ 1.5 dB in a noise sensitive area that is exposed to aircraft noise of DNL 65 dB and higher when compared to the no action alternative for the same timeframe. A reportable noise increase is an increase of:

- DNL 3.0 dB or more in areas exposed to aircraft noise of between DNL 60 and DNL 65 dB;
- DNL 5.0 dB or more in areas exposed to aircraft noise of between DNL 45 and DNL 60 dB.

Recognizing that some types of historic properties may be affected by aircraft overflights even at a noise level below these criteria, we also consider the potential for the introduction of visual elements that could diminish the integrity of the property’s historic features.

Identification of Historic Properties

Section 106 regulations direct Federal agencies to make reasonable and good faith efforts to identify historic properties that are either on, or eligible for listing on, the National Register (36

¹ Day-Night Average Sound Level (DNL) takes into account the noise level of each individual aircraft event, the number of times those events occur, and the time of day in which they occur. DNL includes a 10-dB noise penalty added to noise events occurring from 10:00 p.m. to 7:00 a.m., to reflect the increased sensitivity to noise and lower ambient sound levels at night.

CFR § 800.4(b)(1)). The FAA focused its efforts on identifying historic properties within the APE to which an adverse effect would change the character of the property's use or physical features within the property's setting that contribute to its historic significance, or introduce atmospheric, audible, or visual elements to the area that would diminish the integrity of the property's significant historic features (including its setting, provided that the setting has been identified as a contributing factor to the property's historical significance). For this undertaking, there would be no direct physical effects on historic resources.

The FAA's initial efforts to identify historic properties within the APE include review of publicly available databases of properties listed on the National Register. A search of the National Register, accessed through NEPAassist², was completed to identify those properties listed on the National Register within the proposed APE. **Figure 4** illustrates the 17 listed properties identified within the proposed APE that are registered in the NRHP.

Figure 4. Location of Historic Properties within the Proposed APE
(Not to scale)

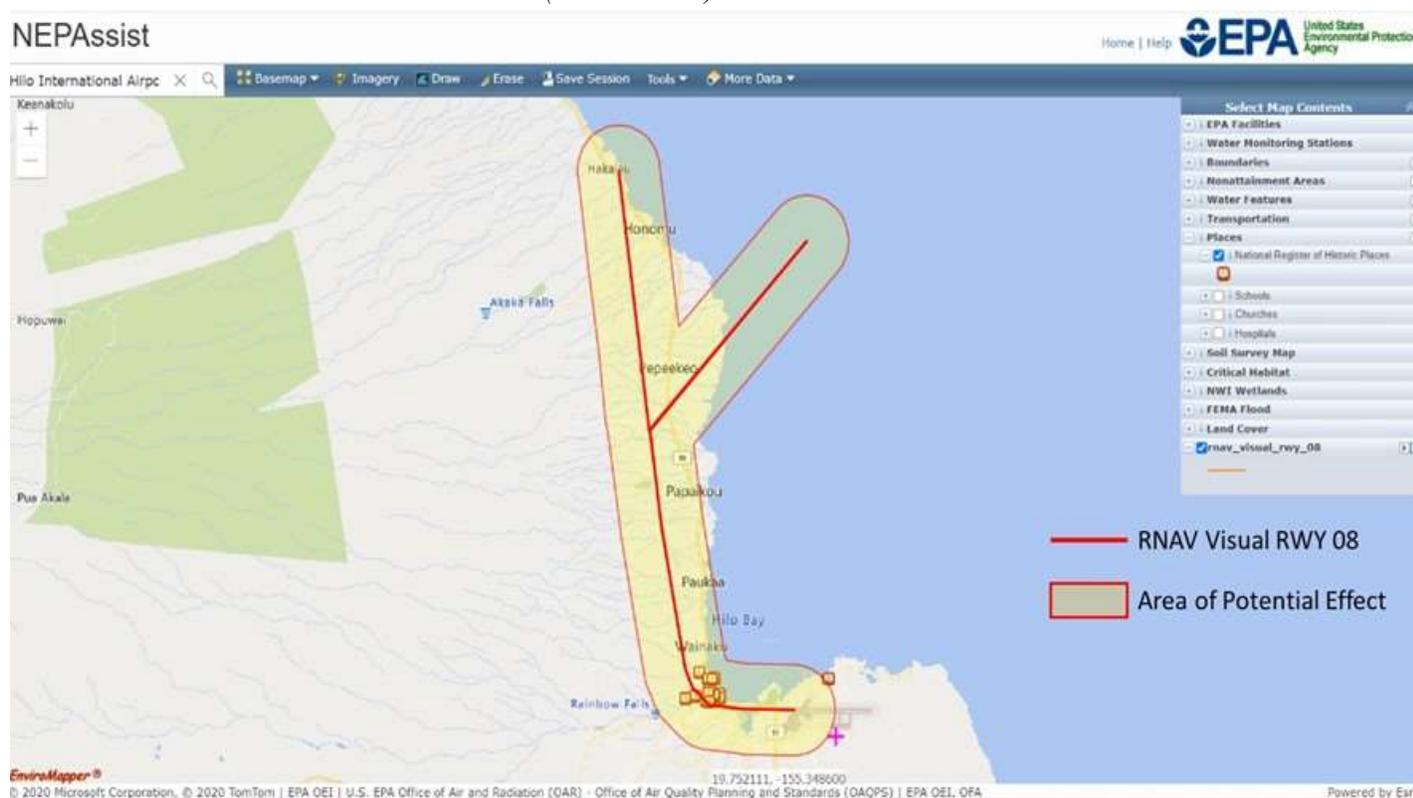


Table 1 lists the names of the 17 identified historic properties depicted in **Figure 4**, and includes the URL link to the National Archives Catalog entry for each historic property. None

² NEPAassist is a web-based application that draws environmental data dynamically from the Environmental Protection Agency Geographic Information System databases and web services and provides immediate screening of environmental assessment indicators for a user-defined area of interest. Located: <https://www.epa.gov/nepa/nepassist>

of the historic properties listed in **Table 1** feature a quiet setting as a qualifying characteristic for listing in the National Register.

Table 1. Historic Properties Located within the Proposed APE

Listed Historic Property Name with Corresponding National Archives Catalog URL Entry
1. A.J. Williamson House, 31 Halaulani Place, Hilo - https://catalog.archives.gov/id/63815622
2. Levi and Nettis Lyman House, 40 Halaulani Pl, Hilo - https://catalog.archives.gov/id/63815423
3. Herbert Austin Truslow House, 52 Halaulani Pl, Hilo - https://catalog.archives.gov/id/63815417
4. W.H. Hill House, 91 Halaulani Place, Hilo- https://catalog.archives.gov/id/63815419
5. Edward H. and Claire Moses House, 104 Halaulani Pl, Hilo - https://catalog.archives.gov/id/63815413
6. James and Catherine Parker House, 72 Halaulani Pl, Hilo - https://catalog.archives.gov/id/63815415
7. Hilo Masonic Lodge Hall – Bishop Trust Building, 64 Keawe St, Hilo - https://catalog.archives.gov/id/63815662
8. Volcano Block Building, 23-37 Wianuenue Ave, Hilo - https://catalog.archives.gov/id/63815674
9. W.H. Shipman House, 141 Kaiulani St, Hilo - https://catalog.archives.gov/id/63815626
10. Thomas Guard House, 240 Kailulani St, Hilo - https://catalog.archives.gov/id/63815628
11. U.S. Post Office and Office Building, 154 Waianuenue Ave, Hilo - https://catalog.archives.gov/id/63815630
12. District Courthouse and Police Station, 141 Kalakaua St, Hilo - https://catalog.archives.gov/id/63815682
13. Waiakea Mission Station – Hilo Station, 211 Haili St, Hilo - https://catalog.archives.gov/id/63815640
14. Rev. D.B. Lyman House, 276 Haili St, Hilo - https://catalog.archives.gov/id/63815648
15. Walter Irving and Jean Henderson House, 82 Halaulani Pl, Hilo - https://catalog.archives.gov/id/63815411
16. Palace Theater, 38 Haili St, Hilo - https://catalog.archives.gov/id/63815660
17. S. Hata Building, 318 Kamehameha Ave, Hilo - https://catalog.archives.gov/id/63815634

Consistent with FAA Order 1050.1F, the FAA’s noise screening analysis for this undertaking did not identify any “significant” or “reportable” changes in aircraft noise exposure. Accordingly, the proposed undertaking would not introduce an audible element that would diminish the integrity of the property’s significant historic features, including its setting.

The FAA also considered the potential for the introduction of visual elements that could diminish the integrity of the property’s historic features. The APE was compared to the location of historic flight tracks. In the event changes in aircraft flight paths introduce new overflights, the area at and around the new aircraft flight path would be further investigated for the presence of historic properties that are eligible for, but not currently listed in, the National Register.

Figure 5 below depicts 30 days of aircraft flight tracks within the proposed APE from the 2019 calendar year.³ Based on flight track data as depicted in **Figure 4**, the listed historic properties in **Table 1** have been historically overflowed by aircraft.

Figure 5. Aircraft Flight Tracks for 30 Days Within the APE (Not to scale)



The FAA compared the proposed flight procedure with current flight tracks, as shown in **Figure 5** above, and determined that there would be no new areas overflowed. Accordingly, the proposed

³ Data from 2019 was selected, as it is considered to best represent general average traffic counts and traffic flows accounting for seasonal variations and peak travel times for Hilo International Airport prior to the Coronavirus Disease 2019 public health emergency.

undertaking would not introduce a visual element that would diminish the integrity of the property's significant historic features, including its setting.

Proposed Determination of Effects

As a result of careful consideration of the potential effects of the proposed undertaking, the FAA proposes a finding of “*no historic properties affected.*” The FAA has determined that the proposed undertaking would not have the potential to introduce audible or visual elements that could diminish the integrity of a historic property. The proposed undertaking would not introduce a change in aircraft noise exposure, nor introduce flight tracks that would change any existing impacts on historic properties and cultural resources, if any such properties are present.

Identification of Other Interested Parties

The FAA shall seek and consider the views of the public in a manner that reflects the nature and complexity of the proposed undertaking and its effects on historic properties. The FAA is inviting local Native Hawaiian organizations with jurisdiction over land within the proposed APE to participate in consultation. The FAA is inviting the Hawaiian Civic Club of Hilo, Mauna Kea Anaina Hou, and Royal Order of Kamehameha I Heiau Mamalahoa, Helu 'Elua, to participate in government-to-government consultation regarding any concerns that uniquely or significantly affect local Native Hawaiian organizations related to the proposed project.⁴ Additionally, we are affording Hawaii County, Hawaii, the same status in this consultation as the State Historic Preservation Division, with respect to the potential effects of this undertaking. The FAA initiated consultation with these other interested parties concurrent with this letter. The FAA is requesting their assistance to identify potentially eligible properties within the APE.

The FAA may also identify additional consulting and interested parties through the NEPA public involvement process. Consistent with this effort, the FAA requests your assistance to identify other parties that should be invited to participate in consultation. Similarly, the views of the public are essential to inform federal decision-making in the Section 106 process. The FAA requests your assistance in identifying community groups or associations that likely have an interest in the undertaking and its effects on historic properties.

Request for Concurrence

The FAA requests your review of the information contained in this document and seeks your comments within 30 days. Pursuant to 36 C.F.R. § 800.4(a)(1) and (2), and § 800.4(d)(1), the FAA seeks your concurrence with the finding of “*no historic properties affected*” for this

⁴ Tribal Directory Assessment Tool (TDAT) was developed by the Office of Environment and Energy (OEE) to help users identify tribes that may have an interest in the location of a HUD-assisted project, and provide tribal contact information to assist users with initiating Section 106 consultation under the National Historic Preservation Act (54 U.S.C. § 300101 et seq.). Located: <https://egis.hud.gov/TDAT/>

undertaking. We understand that you may have concerns regarding the confidentiality of information on areas or resources of religious, traditional, and cultural importance to the Tribe. We would be happy to discuss these concerns and develop procedures to ensure that the confidentiality of such information is maintained. The FAA recognizes the Coronavirus Disease 2019 public health emergency may affect the consultation timeframe and ultimately those of the Federal, state, and local agencies. We look forward to your response. If you have comments or questions, please contact Sara Massey at sara.l-ctr.massey@faa.gov.

Sincerely,

B. G. Chew
Acting Group Manager
Operations Support Group
Western Service Center