



April 30, 2014

Harrison Rue
Community Building and TOD Administrator
City and County of Honolulu
650 S. King Street, 7th Floor
Honolulu, HI 96813

**RE: Comments on the Downtown Neighborhood Transit-Oriented Development Plan
(public review draft, September 2012)**

Dear Mr. Rue,

On behalf of Historic Hawai'i Foundation (HHF), I am pleased to offer these comments on the Downtown Neighborhood Transit-Oriented Development Plan as it relates to historic and cultural resources.

HHF is a membership-based non-profit corporation with the mission to preserve and encourage the preservation of sites, buildings, objects and communities significant to the history of Hawai'i. HHF is the only statewide 501(c)3 organization exclusively dedicated to historic preservation.

HHF is a consulting party to the Federal Transit Administration (FTA) and to its project partner, the City & County of Honolulu (CCH) through the Honolulu Authority for Rapid Transportation (HART), and other City agencies with jurisdiction such as the Department of Planning and Permitting (DPP) and Department of Transportation Services (DTS). HHF was a participant in the Section 106 process under the National Historic Preservation Act that resulted in the executed Programmatic Agreement (PA) for the Honolulu Transit project (January 2011).

The PA includes stipulations to identify, avoid, minimize and mitigate adverse effects to historic properties that may be caused by the undertaking. One of these stipulations includes measures related to the City's planning for Transit Oriented Development (TOD) and other development projects along the corridor, including HART's coordination with DPP regarding land use planning activities, including integration of transit-oriented development with historic preservation in the vicinity of stations.

During the development of the TOD Plans in 2011-12, HHF attended and participated in community meetings, surveys and presentations about the plans and provided comments in those forums. HHF also raised issues with FTA and HART through the consultation processes associated with implementation of the PA.

In September 2012, DPP released TOD plans for the Downtown and Kalihi Station areas. These plans include guiding principles, vision statements, urban design, land use and transportation concepts. In October 2012, HHF provided written comments to FTA and HART, with copies to DPP, that included concerns about whether identification of historic properties and measures for

their protection had been adequately addressed in the TOD plans and if those plans had been developed in accordance with the stipulations in the PA. Subsequently, HHF met with staff at HART and DPP about these concerns.

More recently, in March 2014, HHF met with DPP and DTS about continuing concerns. In response, you asked HHF to provide detailed comments and recommendations about the Downtown TOD plan. This letter responds to that request.

#	Plan Page/Reference	HHF Comment	HHF Recommendation
1	Page 1-2, Section 1.1 Purposes and Process; Honolulu Rail Transit Project	The transit project is subject to agreements that affect land use and planning issues, including TOD	Include a statement summarizing relevant sections from the FEIS, PA, and other governing documents.
2	Page 1-2, Section 1.1 Purpose and Process; Neighborhood Transit-Oriented Development (TOD) Plans	Historic preservation is excluded from the types of issues to be addressed in the TOD plans, but is fundamentally part of land use planning.	Include historic preservation goals, objectives and implementation strategies throughout the plan, and make this explicit in the summary on page 1-2. Do not limit the plans to “opportunities for new development” but also include “including rehabilitating and adaptive use of existing buildings and assets.”
3	Page 1-3, How and When will this Plan be Implemented?	Text includes goal of providing a framework for “new development while preserving historic and/or cultural resources.” HHF agrees with this statement and appreciates its inclusion in the plan.	
4	Page 1-3, How and When will this Plan be Implemented?	Last paragraph states that the illustrative sections of the plan, while not precise predictions of future development, provide the intent. HHF is concerned that some of the diagrams, models, sketches and photographs used throughout the plan were not developed with historic	Revise illustrative sections to be responsive to preservation concerns (see further comments for specific examples) and include statements and disclaimers that make it clear that future development will need to take historic/cultural properties into consideration.

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		preservation in mind, and are misleading as to what would be appropriate or acceptable for historic and/or cultural sites.	
5	Pg. 1-10: Section 1.3: Corridor Vision and Planning Principles	<p>The enabling language for TOD plans includes as one of the fundamental goals of TOD “identification of important neighborhood historic, scenic and cultural landmarks, and controls to protect and enhance these resources.”</p> <p>The vision and planning principles include a reference to a “vibrant, historic Chinatown” but no further exploration or framework for other historic properties in the 3 station areas.</p> <p>The planning principles address issues of land use, circulation, open space and housing. They do not address design or architecture, including urban design elements such as scale, massing, orientation, setback/build-to lines, or block granularity.</p>	<p>Add Guiding Principle #7: Provide enriched urban environment</p> <p>Preserve and enhance existing buildings and properties of human scale and historic value to ensure the richness of the urban environment. Develop a vibrant mix from retaining historic districts and structures while adding contemporary, well-designed buildings. Ensure that historic buildings are preserved, rehabilitated and used for a variety of community services. Provide a context in which buildings of scale are part of a mix that creates walkable community with a tapestry of the history, culture, design, and values that are embodied in the buildings that currently exist, and where well-designed contemporary buildings add to the urban landscape in a harmonious and compatible way. Support a diverse community where residents of all income levels have access to well-built and solid structures that house amenities and services, with lively gathering spaces punctuating the area.</p>
6	Pg. 1-11 Overall Concept: Station Summaries	The station summaries focus on land use and circulation. The description of historic Chinatown includes character and scale, but the Downtown and Iwilei areas do not follow the same pattern.	Keep the historic Chinatown description (it captures the intent very well). Add statements about historic Aloha Tower, the waterfront, the downtown commercial district, and the historic industrial buildings in

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			Iwilei to complement the existing descriptions.
7	Pg. 1-12 Figure 1-3 TOD Plan Concept	Land use color coding includes bright red for “mixed use (high intensity)” which is used without gradation for areas in the historic Capital district, downtown, historic Chinatown, Aloha Tower, Iwilei and Kapalama. If the existing scale and density of Downtown represents “mixed use (high intensity)” then this graphic indicates the intent to have the same scale and density at all the other bright red areas. As existing areas are nowhere near that level of development, to achieve such an outcome would require wholesale clearing and redevelopment of existing buildings. This is completely counter to the goal of preserving and protection historic properties, and amounts to a demolition mandate. It is reminiscent of the urban renewal movement, which was devastating for urban centers and historic districts.	<p>Add finer scale to the color and intensity mapping. Reduce the proposed density and intensity for Capital district, Aloha Tower and the harbor front, Chinatown, Iwilei and Kapalama.</p> <p>Add definitions for each land use type, especially if a level of intensity is indicated.</p>
8	Pg. 1-13 Figure 1-4 Illustrative View of Downtown	Illustration includes concepts for new development along the planned rail line. Infill development on parking lots and non-historic properties is appropriate, but the proposed scale is not (high rise glass building on the mauka side of Nimitz is in the Chinatown special district and exceeds the height limit). Redevelopment of known historic structures (HECO power plant) will be subject to historic preservation	<p>Revise the illustration to:</p> <ol style="list-style-type: none"> 1. Reduce the scale of all infill development in Chinatown to the height/mass/setbacks and other design criteria of the special district. 2. Add a disclaimer to any statements about redeveloping HECO power plant to acknowledge its age and historic status that could affect its redevelopment. 3. Remove the conceptual re-

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		review and agreements and should not be assumed. Reuse of existing historic buildings (Pier 14) may be acceptable, but must preserve historic-character-defining features and meet preservation standards for the treatment of historic properties; they illustration does not meet these standards.	skinning of the Pier 14 building to retain its historic features. The enhanced landscaping, outdoor seating areas, waterfront promenade and changes that do not adversely affect historic properties should remain.
9	Pg. 1-14 Section 1.4 Planning Context	Includes the Chinatown Special District and Capital District design guidelines, which is appropriate and useful to include these references.	This section would benefit from an explanation of other planning contexts outside the jurisdiction of CCH, but that have an effect and need to be taken into account. These include the Aloha Tower Development Corporation; Hawai'i Community Development Authority; HART and its TOD stipulations; State Historic Preservation Division and the statewide preservation plan; Hawai'i Department of Transportation plans for Nimitz Hwy and Honolulu Harbor; etc. This may also be a place to note the Merchant Street historic district and the historic preservation review process for all historic properties.
10	Pg. 2-2 Section 2.1 Context	Includes planning goal for context-sensitive development, which is appropriate and useful.	
11	Pg. 2-5 Opportunity Sites	States that "while buildings on some sites may be demolished and rebuilt from the ground up, others may be adaptively reused or improved.... 'opportunity' sites are those that are...underutilized due to low building intensities or low building value relative to land	Revise text: Potential development or "opportunity" sites are those non-historically significant sites that are appropriate for redevelopment. Considerations may include such factors are vacant or underutilized parcels; those with low building value

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		<p>value.”</p> <p>Many historic buildings have lower intensity than what might be allowed per zoning or that have lower building value than land value. These include properties such as the A&B Headquarters, the Dillingham Transportation Building, the C Brewer Building, the historic buildings on Fort Street, the historic buildings in Chinatown, the YWCA, the Merchant Street historic district, etc. The text would lead a reader to believe that these are “opportunity sites” for development, when they are not and should not be.</p>	<p>relative to land value; or where non-historic buildings are vacant or in disrepair.</p> <p>Although not appropriate for demolition and new construction, additional “opportunity sites” exist for historic properties that may be rehabilitated or repurposed for adaptive use, following appropriate preservation methods and guidelines.</p>
12	Pg. 2-8 Development Constraints	<p>Includes “development opportunities may be hindered...by historic status.”</p> <p>While we appreciate the disclaimer that lets readers know that historic status is a factor in development evaluations, the tone implies that historic status is a negative assessment. It would be preferable to indicate that development based on demolition is hindered by historic status, but development based on using existing buildings and resources is enhanced by it.</p>	Revise.
13	Pg. 2-8 Development Constraints	<p>Downtown Station area identifies parking lots makai of Nimitz Hwy as development opportunities.</p> <p>Irwin Park is a historic property and is subject to a deed restriction that prohibits any use</p>	Clarify applicability

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		other than public park. The properties makai of Nimitz are not under the jurisdiction of DPP. Is this plan meant to address ATDC and HCDA parcels?	
14	Pg. 2-11 Historic and Cultural Resources	<p>Paragraph 1: see comment below on the limitations of the data contained in Figure 2-3 and Table 2-2.</p> <p>Paragraph 2: the commitment to preservation and reuse of historic resources through the special district guidelines is good, but not sufficient. Other historic properties lack this same protection.</p> <p>Paragraph 3: the commitment to preservation of archaeological and cultural resources (including burial sites) is good, but the public mandate for protection is not limited to archaeology.</p>	<p>Recommend a preservation policy goal be added to the plan, to include a Honolulu Preservation Review Commission to assist with inventory, survey and recommendations for historic designation for local districts and individual buildings; for DPP to adopt design standards and guidelines based on the Secretary of the Interior's Standards for the Treatment of Historic Properties for all historic buildings and structures; and for DPP to develop a programmatic agreement with SHPD for the review and approval for any permits that would affect the eligibility and/or character-defining features of historic properties.</p> <p>Revise last sentence to: "Any significant historic properties—whether architectural, archaeological or cultural—identified during the development process will have to comply with federal, state and local preservation laws and regulations."</p>
15	Pg. 2-12 Table 2-2 Historic Resources Pg. 2-3 Figure 2-3 Historic Resources	The data source for the list and map of historic properties includes: 1) designated properties on the state and/or national register of historic places; and 2) the inventory and	Using preservation professionals qualified in the fields of preservation architect or architectural historian, conduct and update the inventory and survey of historic buildings and

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		<p>survey of eligible historic properties conducted for the transit project.</p> <p>The list is beneficial within its limits, but those limits are significant. The survey boundary for the transit project was the guideway alignment and one parcel to each side of the transit line (or 400 feet in cases where there is not a parcel line). This boundary is not consistent with the TOD planning area boundary of ¼ mile and ½ mile radius around each transit station</p> <p>Therefore, any potential historic property that lies between <400-feet and 2640-feet from the three stations, unless it is already designated, has not been included. As neither the State nor the City has updated its inventory of historic buildings on O‘ahu since the 1970s, it is reasonable to assume that there are additional historic properties that have been excluded from the list and map.</p> <p>The figures may mislead a reader into thinking that it is a finite and closed list, when in fact the presence of additional historic buildings, archaeological and cultural resources are both possible and probable. A windshield survey of Iwilei alone notes the likely eligibility of Dole Cannery, American Can Company, Gentry Design Center (now Nā Lama Kukui), and the Medical Examiner’s Office. There are also numerous eligible</p>	<p>other resources within the TOD planning area, following the guidelines and process prescribed by SHPD. Update the list and map with the findings.</p>

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		properties on N. King Street and in the Kapālama area that are not marked. Downtown structures may also have achieved historic status in the past 30 years since the last inventory.	
16	Pg. 2-16, Table 2-3 Downtown TOD Land Use Designations	Includes boundaries for Chinatown and Capital special districts. Should also include the Merchant Street historic district, which does not have a special district per CCH but is subject to SHPD review.	Revise table.
17	Pg. 2-17, Figure 2-4 Land Use Plan	Chinatown historic district is shown at the same intensity as Downtown, which is inappropriate. Even with the special district boundary shown, the implication is one of high density new development, which could only be achieved through substantial demolition. The Aloha Tower area and the Merchant Street historic district are also inappropriately included in this land use designation. The extension of Downtown along River Street is also highly questionable.	Revise the map to reduce the level of intensity for Chinatown, River Street, Merchant Street district, and Aloha Tower district.
18	Pg. 2-20 Figure 2-7, Maximum Building Heights	Proposed heights are primarily consistent with existing limits for Chinatown district, except for parcels adjacent to station (proposed increase from 80' to 200'). This increase is not justified. Provides for 150-300 feet in Iwilei, which is fine for infill but could put pressure on historic properties.	Remove height increase at Chinatown parcel and restore to 80' limit.

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19	Pg. 2-22 Illustrative 3D model of height and scale	<p>Birds-eye view of Downtown/Chinatown shows new towers on the HECO power plant site, which is eligible for the historic register</p> <p>Perspective of Iwilei shows new development on the American Can Co., the Medical Examiner's office and other buildings on Iwilei Rd, and on North King Street. Many of the existing structures may be historically significant.</p>	Revise the models to retain existing buildings that are eligible for the register of historic places (see previous comment about conducting an inventory to identify them).
20	Pg. 2-25 Section 2.4 Goals and Policies	LU-G2: calls for "redevelopment of Irwin Park"	Revise to: "restoration of historic Irwin Park to a public open space"
21	Pg. 2-25 Section 2.4 Goals and Policies	<p>LU-G5: to maintain the scale and fabric of historic Chinatown district (good), "while promoting new higher intensity development at the edges of the district" (not good).</p> <p>The "edges" of the Chinatown historic district are subject to interpretation. There should not be highrise development makai of Nimitz; nor on River Street, nor on Bethel Street, nor on parcels next to the station.</p>	<p>Revise to:</p> <p>"Maintain the scale and fabric of historic Chinatown, historic Merchant Street and historic Capital districts. Ensure infill development is compatible and harmonious in scale, bulk, mass and orientation to complement the historic context."</p> <p>Add new LU-X:</p> <p>"Ensure that historic buildings are preserved, rehabilitated and used for a variety of community services throughout all TOD areas."</p> <p>Add new LU-X:</p> <p>"Ensure that preservation of historic resources is achieved by institutionalizing protective measures, such as establishing a Honolulu Preservation Review</p>

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			Commission to assist with inventory, survey and recommendations for historic designation for local districts and individual buildings; adopting design standards and guidelines based on the Secretary of the Interior's Standards for the Treatment of Historic Properties for all historic buildings and structures; and developing a programmatic agreement with SHPD for the review and approval for any permits that would affect the eligibility and/or character-defining features of historic properties."
22	Pg. 2-25 Section 2.4 Goals and Policies	LU-G8: Aloha Tower itself, along with the historic piers, need to be handled sensitively, and new commercial/residential development can complement if done well	Revise to: "Revitalize the commercial mixed use area anchored by the historic Aloha Tower and historic Piers 10, 11 and 14, with uses and amenities for local residents, and activities that enable people to enjoy its magnificent waterfront setting."
23	Pg. 2-25 Section 2.4 Goals and Policies	LU-G9: Building Intensity and Height LU-G10: Chinatown height Both G9 and G10 are good affirmations of the Chinatown height and scale.	Add new LU-X: "Preserve and enhance existing buildings and properties of human scale and historic value throughout all TOD areas." This concept/policy should be repeated for each of the station-specific policies.
24	Pg. 2-26 Section 2.4 Goals and Policies	LU-P3 Downtown Station <ul style="list-style-type: none">• Mix of uses: good• Redesign Irwin Park: needs more specific parameters• HECO substation: needs	Revise: "Encourage the restoration of historic Irwin Park as a true gathering space and a gateway to Downtown"

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		<p>parameters</p> <ul style="list-style-type: none"> Maritime Museum: good 	<p>“Coordinate with HECO and HCDA to relocate the substation at Aloha Tower and reuse the site, including exploring the potential of repurposing and reuse of the 1930s-era powerplant, and integration with the adjacent Irwin Park and mixed-use development.”</p> <p>Add new LU-X:</p> <p>“Preserve and enhance existing buildings and properties of human scale and historic value throughout Downtown.”</p>
25	Pg. 2-26 Section 2.4 Goals and Policies	<p>LU-P6: Chinatown land use (good)</p> <p>LU-P7: increased heights on Nimitz (not good)</p> <p>LU-P8: adaptive reuse of historic buildings and structures (good); reference to table 2-2 and figure 2-3 (see previous comments), and overcome constraints (needs explanation)</p>	<p>Revise LU-P7:</p> <p>“Foster reuse of surface parking lots along Nimitz Highway with mixed-use developments, cultural uses, community services, shopping, food-related and/or residential units. Provide some public parking within new structured parking facilities.”</p> <p>Revise LU-P8:</p> <p>“Promote adaptive reuse of historic buildings and structures and encourage preservation and rehabilitation through incentives through streamlined permitting, tax credits or reductions, additional use allowances, transfer of development rights, and other public or private programs.”</p> <p>This should be repeated for all station areas, not just Chinatown.</p> <p>Add new LU-X</p> <p>“Commit to a joint City/State</p>

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			process to regularly identify and evaluate potential historic and cultural resources; to develop an agreement to provide for efficient and effective permit review for projects that do not have an adverse effect on historic properties; and to encourage preservation actions.”
26	Pg. 2-27	LU-P for Iwilei Station	Add new LU-X: “Preserve and enhance existing buildings and properties of human scale and historic value throughout Iwilei.”
27	Pg. 2-27	LU-P for All Stations	Add new LU-X: “Promote adaptive reuse of historic buildings and structures and encourage preservation and rehabilitation through incentives through streamlined permitting, tax credits or reductions, additional use allowances, transfer of development rights, and other public or private programs.” Add new LU-X: “Preserve and enhance existing buildings and properties of historic value.”
28	Pg. 2-27 All Stations, Building Intensity and Height	LU-P19: Notes restrictions for Chinatown and Capital districts (good)	Add restrictions for Merchant Street, and other historic properties
29	Pg. 2-28 Economic Development	LU-P25: Chinatown unique identity (good)	
30	Section 3: Mobility	General comment: Increasing multi-modal transportation options (sidewalks, promenades,	Clarify.

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		<p>pedestrian malls, bike lanes, rail, buses, additional streets and improved street connections, etc.) is laudable and an important part of the plan. Given the limited amount of land available for public improvements, it should be noted how and where the streets and easements will be acquired. For example, will sidewalks be widened by using private property when it is redeveloped, or by narrowing the street travel lanes, or by removing obstacles such as utility boxes and planters, or some combination? HHF supports the goal, but only in instances where the implementation does not indicate the need to remove or damage an existing historic property for the purpose of installing transportation options.</p>	
31	Pg. 3-19 Parking	<p>HHF supports the exemption from parking minimums, as an inflexible demand for on-site provision of parking can make adaptive reuse and investment in historic buildings problematic.</p> <p>We also note that there is also a threat to historic properties (and to the overall goals of the plan) when parking ratios or amounts are set only by market forces. Developers may choose to overbuild parking, regardless of regulatory minimums, to meet financing requirements or for profits or to meet consumer</p>	<p>Retain the proposed waiver of parking minimums, and add a parking maximum (may be based on distance from bus or rail options). This can be a cap on number of spaces allowed, or the amount of area that can be used for parking, or that parking is included in the building FAR.</p>

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		expectations. These can lead to a predominance of parking as a use and undermine the urban design goals, including preservation.	
32	Pg. 3-25 Section 3.4 Goals and Policies	<p>Station Access Design:</p> <p>The access to the Downtown Station has been the subject of discussion with HART, FTA, HHF and other historic preservation consulting parties, to ensure that the station design minimizes impacts to the historic Dillingham Transportation Building, its courtyard, Irwin Park, and provides pedestrian access to Bishop and Alakea streets. The area sidewalks are clearly insufficient to handle the increased volume.</p>	<p>Add new MB-X</p> <p>Work with HART to improve pedestrian access to station areas through improved sidewalks, location of station entrances, and minimizing and adverse effects to adjacent historic properties.</p>
33	Pg. 3-27	<p>Parking</p> <p>See comment above on parking maximums</p>	<p>Add new MB-X:</p> <p>Establish parking maximums via methods such as a cap on number of spaces allowed, or the amount of area that can be used for parking, or that parking is included in the building FAR.</p>
34	Pg. 4-2 Section 4.1 Station Area Character	Downtown Station Area states Irwin Park should be redeveloped	<p>Revise:</p> <p>Historic Irwin Park, which serves as a gateway into Downtown, should be restored as a public open space along the waterfront promenade.</p> <p>Add new paragraph:</p> <p>Downtown—including the Central Business District and the Aloha Tower waterfront area—provides a context in which</p>

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			buildings of scale are part of a mix that creates walkable community with a tapestry of the history, culture, design, and values that are embodied in the buildings that currently exist, and where well-designed contemporary buildings add to the urban landscape in a harmonious and compatible way.
35	Pg. 4-2 Section 4.1 Station Area Character	Chinatown Station Area includes discussion of historic district (good)	Add: Historic Chinatown supports a diverse community where residents of all income levels have access to well-built and solid structures that house amenities and services, with lively gathering spaces punctuating the area.
36	Pg. 4-2 Section 4.1 Station Area Character	Iwilei Station Area	Add: Iwilei is transformed to a context in which buildings of scale are part of a mix that creates walkable community with a tapestry of the history, culture, design, and values that preserves significant historic buildings while adding quality infill on a newly connected street system.
37	Pg. 4-3 Figure 4-1 Illustrative View of Aloha Tower	The illustration purports to show “improvements” at historic Irwin Park, Pier 10 and HECO, none of which are consistent with historic standards. The HECO highrise is too tall and unlikely to be built. Is an “iconic” tower in that location really desirable or feasible?	Revise the illustration. Remove architectural add-ons to Pier 10 (roof terraces, projecting signs, lattice works) and instead showcase the character-defining features of the building and use reversible/non-structural elements such as the benches, trees, outdoor seating and pavers. Remove the fountain and sculpture from Irwin Park and instead show trees, no cars, people engaged in activities.

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38	Pg. 4-4 Figure 4-2 Illustrative View of Chinatown	<p>The illustrative includes new highrises on King/Beretania and on River Street. Are these consistent with height limits? The Beretania tower may be okay (depends on the actual site and what's there now) but the River Street towers are not compatible with the historic district, and may indicate demolition of the existing fabric.</p> <p>The pedestrian bridge over Nuʻuanu stream is a nice addition, as is the additional structure in Aʻala Park.</p>	Revise the illustration to remove the River Street development. Retain the historic building.
39	Pg. 4-5 Illustrative View of Iwilei	The illustrative view shows retention of Dole Cannery (including parking garage and theater) but demolition of American Can Co.	Revise illustration to remove the new development at the American Can Co. building. Retain the historic building.
40	Pg. 4-9 Open Space Table 4-1 Existing Parks	Table includes City parks only. Should include Irwin Park and Walker Park (state-owned)	Revise table.
41	Pg. 4-14 Section 4.4 Goals and Policies	Open Space	<p>Add new UD-X:</p> <p>Restore and rehabilitate historic parks to enhance their character-defining features and maintain or restore missing elements.</p>
42	Pg. 4-14 Section 4.4 Goals and Policies	<p>Station Area Character</p> <p>UD-P1 includes a policy to “work with advertisers and ... businesses to provide basic amenities.” This indicates some intent to allow advertising in exchange for public amenities, which is a slippery slope towards privatizing public space and commercializing the public</p>	Revise to clarify or delete.

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		realm. It has the potential for inappropriate scenic intrusion which could affect the historic feeling, association, context and setting, and would violate other long-time prohibitions on outdoor advertising.	
43	Pg. 4-15 Streetscapes, Sidewalks and the Street Interface	UD-P7 addresses street frontages and the sidewalk between curb and building. Should include a commitment to retain historic stone curb stones wherever they currently exist, and to restore them in areas where they were used historically.	Revise.
44	Pg. 4-15 Streetscapes, Sidewalks and the Street Interface	UD-P8 Chinatown historic trail (good)	
45	Pg. 4-15 Site Planning and Building Massing	All Stations	Add new UD-X: Historically significant buildings should be preserved and rehabilitated following the Secretary of the Interior's Standards for the Treatment of Historic Properties.
46	Pg. 4-16 Chinatown Station	UD-P18 Chinatown scale (good)	
47	Pg. 4-16 Open Space	UD-P25 Irwin Park	Revise: Relocate the existing surface parking at historic Irwin Park and restore the park as a true recreation and scenic facility.
48	Pg. 6-6 Zoning and Land Use	General Comment: This is an appropriate location to include the preservation regulations and incentive programs mentioned in	Revise per previous comments for consistency and follow-through.

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		previous comments.	

HHF's review of the Downtown TOD Plan is based on historic and cultural resources and measures to identify, protect and enhance them. These comments are designed to assist DPP to make these goals explicit, specific and enable future implementation. In addition, we would like to commend the effort that so clearly went into development of the TOD plan overall.

We look forward to working with you on revisions to the plan, and to its eventual successful implementation.

Very truly yours,



Kiersten Faulkner, AICP
Executive Director

Copies via email:

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