

# HISTORIC HAWAII FOUNDATION

August 22, 2018

Joanne E. Hiramatsu  
Belt Collins Hawai'i LLC  
2153 North King Street, Suite 200  
Honolulu, Hawaii 96819

**Re: Draft Environmental Impact Statement (DEIS)  
Ala Moana Regional Park and Magic Island Improvements  
Honolulu, Island of Oahu  
TMK: (1) 2-3-037:001, 002, 022, 023, 025**

Dear Ms. Hiramatsu:

Historic Hawai'i Foundation received notice and request for comments from Belt Collins on behalf of the City & County of Honolulu on the Draft Environmental Impact Statement (DEIS) for the proposed park and facilities improvements at Ala Moana Regional Park (AMRP) and Magic Island. Thank you for the opportunity to comment.

### **Interests of Historic Hawai'i Foundation**

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. As an organization that is concerned with the effect of the project on historic properties, HHF is providing these comments in accordance with Hawai'i Revised Statutes (HRS) Chapter 343.

Ala Moana Park was constructed in the 1930s and was listed on the Hawai'i Register of Historic Places in 1988 as part of the multiple property listing of the "City and County of Honolulu Art Deco Parks and Playgrounds." As a property listed on the historic register, the park is designated as a "significant historic property" under HAR Title 13.

### **Summary of HHF Comments and Concerns**

HHF supports efforts to provide regular and routine maintenance and repair of historic properties, as well as rehabilitation for deteriorated or neglected historic structures, buildings and landscapes, so long as such efforts follow appropriate standards and guidelines for the treatment of historic properties. While HHF is pleased that the City is making strides to address concerns for the longevity, usability and appearance of the Park, we are extremely concerned that the "preferred alternative" is not based on historic preservation standards.

HHF recommends that a new alternative be developed that is less aggressive and impactful than the "Enhance" alternative being proposed, and that would be more appropriate for historic properties than the "Restore" alternative that is characterized as short-term improvements.<sup>1</sup> The DEIS states that the short-term projects are either completed or under construction; these projects were evidently pursued without completing environmental or historic preservation compliance.

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<sup>1</sup> DEIS, Section 2.7.2 Alternative: Restore, p 2-44

### **Project Summary & HHF Comments**

**Project Scope:** The project proposes to “restore, revitalize, enhance, and improve the AMRP and Magic Island recreational parks’ grounds and facilities as a result of a new master plan process that outlined both long-term and short-term improvement plans.”<sup>2</sup>

The DEIS states that alternatives developed during the planning process with the intent to “restore existing character features, promote current inactive areas of the Parks, and enhance the popular amenities. The master plan’s goal was to address the overall needs, and to find long-term, sustainable solutions for the Parks.”<sup>3</sup>

#### **Process and HHF’s Previous Involvement:**

- Draft Master Plan proposals were presented for public comment in 2015 and 2016. HHF provided comments to the Department of Parks and Recreation on August 8, 2016.
- On March 28, 2017 HHF was advised that its comments had been forwarded to the Department of Design and Construction for consideration in preparation of the Master Plan.
- On December 20, 2017 the Notice for the Draft EIS Preparation (EISPN) was issued for comment. HHF submitted comments on January 22, 2018 and the comments were acknowledged on May 7, 2018 with assurances that historic resources would be identified and evaluated in the Draft EIS and HHF’s comments would be addressed.
- A public presentation of the Ala Moana Park Regional Master Plan was held on January 29, 2018 to present the preferred alternative for the master plan, which is now referenced as the Proposed Action for the EIS.<sup>4</sup> Significant public input, especially regarding parking, led to changes in the DEIS.
- The DEIS under current review was published on July 6, 2018 and is the subject of these comments.

**Project Area:** The Area of Potential Effect (APE) includes the entire Ala Moana Park and Magic Island Peninsula (Tax Map Keys 2-3-37:001, 002, 022, 023 & 0025). Of the planning area, the historic Ala Moana Park (TMK 2-3-37:001) is the portion listed on the Hawai’i Register of Historic Places. Additional historic properties may be present in the other parcels; however, the DEIS did not conduct an overall assessment of historic contributing or other eligible features.

**Purpose:** The DEIS states that “the community and current park users have expressed concerns to keep the Park’s character the same. The community and the City recognize the need to update and enhance certain aspects of the Parks. The master plan will have full details of the City’s Proposed Action over a period of several years *once the EIS is completed*. The long-term goal for the Park’s

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<sup>2</sup> DEIS, Section 1.3 Purpose and Need, p. 1-5

<sup>3</sup> DEIS, Section 2.1 Proposed Action – Introduction, p. 2-1

<sup>4</sup> DEIS Section 2.3 Proposed Action, p.2-5

revitalization is to maintain and improve the grounds and facilities while remaining true to its local character as “The People’s Park.”<sup>5</sup> <sup>6</sup>” (emphasis added).

**HHF Comment:** We agree with the intent to retain and enhance the park’s special historic character. However, we are concerned that the “preferred alternative” is not an actual master plan, but rather a bulleted “proposed action” list. Previous meetings and written notices stated that the DEIS would evaluate the Master Plan, but now the DEIS appears to state that the Master Plan will follow the environmental review. This order of review is backward. The Master Plan should be completed, then the environmental review should assess its impacts.

Need: “The Proposed Action is needed to accommodate the anticipated volume of visitors associated with the projected population growth of Hawai’i residents. The City needs to restore the aging and deteriorating facilities to a sustainable standard that will comply with current polices and regulations.”<sup>7</sup>

**HHF Comment:** The term “restore” has specific and technical meaning when applied to a historic property. The DEIS is using this term inaccurately when describing interventions or actions affecting a historic property. When describing a treatment of a historic property, “restore” indicates the intention to return the use and appearance to its period of significance (1930s). We believe the City is intending to retain historic character and fabric while making contemporary and harmonious uses viable. That is known as “rehabilitation.”<sup>8</sup>

Terms such as “retrofit”, “remodel”, “improve” and “renovate” also lack specificity when applied to historic properties. They are not based on appropriate standards and lack common definitions. This impedes understanding of what is actually being proposed and how it would affect a historic resource.

The EIS should be revised to use preservation terminology accurately, and to apply appropriate standards accordingly.

Proposed Action (Chapter 2 of the Draft EIS):

“Under the Proposed Action, restoration of the Parks’ features can be accomplished and the potential to maximize usage of other features/spaces can be recognized. These actions are meant to sustain the popular recreational spaces for the future while evolving with City’s policies and initiatives that relate to the environment and public health.”<sup>9</sup>

An annotated list of the proposed park and facility improvements described in the DEIS (Sections 2.3.1 through 2.3.18) is as follows:

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<sup>5</sup> DEIS Chapter 1, Section 1.3.2 Purpose, pp 1-5 & 1-6

<sup>6</sup> DEIS Chapter 1, Section 1.3.2 (footnote) Named “The People’s Park” by President Franklin Delano Roosevelt in 1934

<sup>7</sup> DEIS Chapter 1, Section 1.3.3 Need, P. 1-6

<sup>8</sup> See Secretary of the Interiors’ Standards and Guidelines for the Treatment of Historic Properties.

<https://www.nps.gov/subjects/historicpreservation/standards.htm>

<sup>9</sup> DEIS Section 2.2 Project Compliance, p. 2-4

- Pi‘ikoi Street and Queen Street pedestrian entrance expansions and partial drainage canal cover;
- Widening the shared-use path along the makai side of Ala Moana Park Drive;
- Widening the shared-use path along the Ala Wai Small Boat Harbor;
- Improve the existing canoe launch ramp and crossing from the Canoe Hālau;
- Rearranging the parking along the makai side of Ala Moana Park Drive to add loading and unloading zones near crosswalks;
- Reconfigure parking on the mauka side of Ala Moana Park Drive to add more stalls;
- Keyhole parking lot expansion and reconfiguration;
- Reconfigure and expand Magic Island parking lot;
- Improve the pond edges and paths;
- Renovate McCoy Pavilion and the Banyan Courtyard;
- Improve “high spot” terrace for ADA access, repair pergola, and widen the shared-use paths on both sides;
- Repair drainage canal walls;
- Repair the Bridle Bridge;
- Add a dog park near Kewalo Basin;
- Repair Roosevelt Portals at Atkinson Street entrance and improve the Kamakee Street entrance.
- Sand replenishment and long-term beach nourishment (alternative discussion in Section 2.4);
- Build a playground;
- Relocate the maintenance yard;
- Create a multiuse facility at the Lawn Bowling area;
- Relocate the Ocean Safety’s Honolulu Headquarters.

**HHF Comment:** The action list is difficult to track throughout the 904-page document. The list is not presented in the same order or using the same descriptions in different sections. The action items are inconsistently described and contradict themselves in different sections. Although some items are included in the “preferred action”, later descriptions state that they will not actually be built or evaluated.

HHF recommends that the preferred action use a consistent order and reference system, and that only items that are actually being proposed for implementation be included. Items that are not being proposed should be eliminated (e.g. relocate the maintenance yard, create a multiuse facility at the Lawn Bowling area, relocate Ocean Safety, etc.), or, if they are retained in the preferred alternative, they need to be evaluated and addressed in the environmental assessment.

Identification of Historic Resources:

Any project with potential to affect historic properties must first include identification of the historic resource, evaluation of its significance, evaluation of the proposed project’s potential effect on those resources, and commitments to avoid, minimize and mitigate any potential adverse effect.

In its review of the EISPN (January 22, 2018) HHF recommended that the Ala Moana Master Plan include a specific description of the historic features and characteristics that contribute to the historic significance of the park as a whole.

In its response to HHF’s comment, Belt Collins stated that “the Draft Environmental Impact Statement (DEIS) for this project *will identify all historic structures* and their relationship to the Ala Moana Regional Park. An architectural survey will identify and evaluate historic structures to inform decisions concerning those structures”<sup>10</sup> (emphasis added).

Historic resources are addressed in DEIS Section 4.4, Architectural Resources Table (4-3), Appendix D-2, and Appendix D-3. We infer that Appendix D-3 (Ala Moana Regional Park Improvements Plan Historic Feature Review and Retrofit Assessment) is intended to satisfy the commitment to “identify and evaluate all historic structures.”

**HHF Comment:** The Historic Feature Review does not meet professional standards for identification and evaluation of a historic property. It is a partial assessment, focused on only five of the historic features rather than the Park district as a whole; it does not assess the overall design, contributing features or how the entire preferred alternative will affect the entire historic property.

HHF recommends conducting actual historic landscape and historic building assessments,<sup>11</sup> to address our previous comments and concerns adequately. We continue to stress that such a study is necessary to make informed and thoughtful decisions on historic properties. The EIS needs to be amended to include an appropriate level of study.

**In the following table, HHF summarizes the primary features that contribute to the Ala Moana Regional Park historic district, and whether they were acknowledged in the DEIS.** It is apparent the various sections included only some of the features, and did not attempt to reconcile between sections, and many historic features were left out altogether.

Historic Feature	Acknowledged in DEIS Table 4-3	Acknowledged in DEIS Appendix D3	Acknowledged in SHPD Letter Response to HRS 6E-8 Submittal
Landscape features and spatial alignments	X		
Spatial arrangement (foliage and open space)	X		

<sup>10</sup> Letter from Belt Collins to HHF, May 7, 2018

<sup>11</sup> See <https://www.nps.gov/tps/standards/four-treatments/landscape-guidelines/> and <https://www.nps.gov/tps/how-to-preserve/briefs/43-historic-structure-reports.htm>

<b>Historic Feature</b>	<b>Acknowledged in DEIS Table 4-3</b>	<b>Acknowledged in DEIS Appendix D3</b>	<b>Acknowledged in SHPD Letter Response to HRS 6E-8 Submittal</b>
Roosevelt Portals/Scalloped Walls	X	X	X
Canal Walls	X	X	X
Rock Wall Adjacent to Ala Moana Blvd. Sidewalk and Canal			
Japanese Lagoon (Pond)	X	X	X
Hawaiian Lagoon (Pond)	X	X	X
Keyhole Parking Area	X	X	X
Equestrian Bridle Bridge	X	X	X
Loop Drive	X		
Central Terrace/Pergolas	X		
Sports Pavilion, including gates and artwork	X		
Banyan Court, including significant trees and sculptures	X		
Tennis Courts	X		
Lawn Bowling Green	X		
Boat Harbor			
Pedestrian and Bridle Path link between Ala Moana Park and Kapi'olani Park along the Ala Wai Canal (per original master plan)			
Additional pedestrian bridges crossing the Canal			
Constructed sandy beach area			
Magic Island			

### Affected Environment

Architectural Resources Table (4-3) lists 14 features (identified in Historic Site SIHP #-1388)<sup>12</sup> indicating the proposed action, if any, affecting the identified feature and proposed mitigation commitments to address effects.

**HHF Comment:** See attached reference with detailed comments on historic features, potential effects on the features from the proposed actions, and HHF's comments to avoid or minimize such adverse effects.

**HHF is particularly concerned about the potential effect on significant historic resources from specific elements in the proposed action, including:**

1. Keyhole Parking Lot Reconfiguration and Expansion (destroys historic configuration and spatial alignment)
2. Widening Loop Road (removes street trees and encroaches on open space and central terrace)
3. Design and location of proposed new entry at Pi'ikoi Street (destroys portion of wall and covers portion of canal)
4. Modifications to Lagoon Edges (scope and design is not detailed)
5. Sports Pavilion rehabilitation (shown as "no work" in one section, but "repaired and renovated to original condition" elsewhere. Need clarification and details)
6. McCoy Pavilion Dining Facility (listed in preferred alternative but not detailed)
7. Multiuse Facility at the Lawn Bowling Area (listed in preferred alternative but not detailed)
8. Lack of overall landscape plan and tree preservation and replacement schedule

Table 5-3 assesses the effect of the preferred alternative on natural, cultural and historic resources. This table includes statements that, "Proposed plans preserve, restore and expand upon historic structures and used amenities of the Park. The plans will create a preserved and enhanced environment for public recreational use; establish a deeper sense of identity for the community to the Park"<sup>13</sup> and that, "Ala Moana Regional Park Master Plan has been developed to preserve, restore, and expand upon the historic amenities and structures of the Park. It will create a preserved and enhance environment for public recreational use."<sup>14</sup>

**HHF Comment:** These broad statements are an important statement of intent and help frame the discussion around the Park master plan. However, the detailed action plans fall short of the standards that would ensure the projects would actually preserve, rehabilitate and restore historic features.

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<sup>12</sup> Nomination Form, Hawai'i Register of Historic Places, (1988)

<sup>13</sup> DEIS Section 5.2.4 State Environmental Policy, p.5-23

<sup>14</sup> DEIS Section 5.2.4 State Environmental Policy, p.5-26

While the plan avoids outright demolition or wholesale redesign of the Park, the proposed treatments for the historic features are left vague and undefined. Therefore, we cannot find that the DEIS preferred alternative, nor the current iteration of the master plan, would not have an adverse effect on historic properties.

HHF recommends that the full identification of historic features proceed in accordance with the previous comment; and that the design parameters include an explicit and enforceable commitment to apply the Secretary of the Interiors' Standards for Rehabilitation to the historic buildings, structures and landscapes.

### **Conclusions**

HHF supports many elements of the proposed Park improvements, including increased staffing and maintenance; sand replenishment; increased security measures; repair and maintenance of irrigation systems and circulation systems; and appropriate repair and maintenance of historic buildings and features.

However, HHF remains concerned with the more aggressive elements of the plan, especially those that will modify or adversely affect historic resources. We recommend providing additional standards and guidelines to remedy the issues raised above.

Very truly yours,



Kiersten Faulkner, AICP  
Executive Director

Enclosure:

- HHF Detailed Comments on Effects on Individual Historic Features from Proposed Actions



**Historic Hawai'i Foundation Detailed Review Comments – Historic Architectural Resources**

The following discussion addresses the historic architectural features listed in Table 4-3, in the order in which listed. Next to the feature name is the proposed action number (if any) from the Proposed Action list in Chapter 2.

Historic Feature [Year built]	DEIS Proposed Work (from Table 4-3 / and Chapter 2)	DEIS Proposed Effect / Mitigation (from Table 4-3)
2.3.5 & 2.3.6 - Thoroughfare/ Looped Drive	<ul style="list-style-type: none"> <li>• Remove grass and trees at makai walkway to widen makai walkway into shared-use path</li> <li>• Add drop-off areas to makai side</li> <li>• Add perpendicular parking to mauka side</li> <li>• Remove trees lining mauka side</li> </ul>	<u>Effect:</u> Yes
1932		<u>Mitigation:</u> Architectural Recordation: Addendum to HALS HI-21 (5 large-format shots)

**Comments:** The Original Promenade ran parallel to the ocean (no beach) branching off of the Central Terrace and Pergolas in the ‘Ewa and Diamond Head directions. It was designed by Catherine Jones Richards and Robert Oliver Thompson in 1931 as a shoreline walkway with a line of trees for shade.

*HHF concurs that this Oceanside feature of the park should be improved and adapted to contemporary uses in conjunction with the Central Terrace and Pergolas (2.3.13)*

- According to the DEIS, “during the scoping meetings, the public asked for a wider and shaded pathway that could serve a variety of recreational needs and purposes.” (DEIS p. 2-21)
- Sketches currently shown in Figure 2-8 are not fully developed and do not address the separation of overlapping uses (pedestrian, runners, group exercise, bicycle & skateboard, ADA accessibility, etc.)
- Connection to the Central Terrace and Pergolas is not fully developed.
- Design of this space needs to also coordinate with the street trees and parking on the mauka side of the drive into a fully developed whole.
- The shared use path along the canal, mentioned in the DEIS, is not addressed or incorporated into the overall plan.
- Question the parking dimensions shown for perpendicular parking
  - Parking lot standards recommend minimum 24’ wide driveway
  - 19 foot stalls do not adequately address the significantly larger SUV’s and trucks that are obstructions in multiple lots around town.

Historic Feature [Year built]	DEIS Proposed Work (from Table 4-3 / and Chapter 2)	DEIS Proposed Effect / Mitigation (from Table 4-3)
2.3.2 - Hawaiian Lagoon	<ul style="list-style-type: none"> <li>• Improve edges and hardscaping</li> <li>• Add viewing area</li> </ul>	<u>Effect:</u> Yes
1932		<u>Mitigation:</u> Architectural Recordation: Addendum to HALS HI-21 (4 large-format shots) <ul style="list-style-type: none"> <li>• Plant Hawaiian plant specimens / landscaping</li> </ul>

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2.3.2 - Japanese Lagoon	<ul style="list-style-type: none"> <li>• Add walkway leading to a seating area</li> </ul>	<u>Effect:</u> Yes
1932		<u>Mitigation:</u> Architectural Recordation: Addendum to HALS HI-21 (4 large-format shots) <ul style="list-style-type: none"> <li>• Plant Japanese specimens landscaping</li> </ul>

**Comments:** The ponds and canal were a single concept in the historic design for both aesthetic and functional reasons.

*HHF concurs with proposed rehabilitation if the design is consistent with historic standards and guidelines, for these significant historic features with adaptations for appropriate contemporary uses.*

- Remnants exist of original pond edge walls on which to base reconstruction design
- Disagree that edge treatment to be determined by “existing topography...along with park staff input.” This is a listed historic property and rehabilitation work should be designed by a landscape architect who meets the SOI professional qualifications<sup>1</sup>, preferably with experience in Japanese garden design.
- Coordinate Hawaiian pond design and landscaping with adjacent Canoe Hālau (item 2.3.11).

Historic Feature [Year built]	DEIS Proposed Work (from Table 4-3 / and Chapter 2)	DEIS Proposed Effect / Mitigation (from Table 4-3)
2.3.4 - Drainage Canal Repairs	The park was constructed on reclaimed fill which has limited bearing capacity. <ul style="list-style-type: none"> <li>• For sections of canal wall that have failed propose replacement with a precast concrete panel, finished to match adjacent surface (two approximately 100-foot segments).</li> <li>• Adjacent existing sound walls to be reinforced with concealed structure behind canal wall and below grade, with the face re-plastered to match existing.</li> </ul>	<u>Effect:</u> Yes
1932		<u>Mitigation:</u> Architectural Recordation: -Addendum to HALS HI-21 (5 large-format shots) Preservation: City will ensure that repairs are done in an historically appropriate manner

*HHF concurs with this rehabilitation approach and long-term preservation of this important historic feature.*

Historic Feature [Year built]	DEIS Proposed Work (from Table 4-3 / and Chapter 2)	DEIS Proposed Effect / Mitigation (from Table 4-3)
2.3.3 - Pedestrian Entrance	“Formal entrances at Pi’ikoi Street and Queen Street would enhance pedestrian	<u>Effect:</u> Yes

<sup>1</sup> The Secretary of the Interior's Historic Preservation Professional Qualification Standards <https://www.nps.gov/history/local-law/gis/html/quals.html>

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<p>Expansion – Pi'ikoi Street Non-Historic</p>	<p>ingress/egress to the Parks and provide for emergency pedestrian evacuation from the Parks.” (2.3.3)</p> <ul style="list-style-type: none"> <li>• The current pedestrian bridges around Pi'ikoi Street and Queen Street are offline with the street's crosswalk</li> <li>• The proposed crossing and new entrances would align with the crosswalks over Ala Moana Boulevard.</li> <li>• The Park boundary wall fronting the new entrances will be removed to increase safety and access while entering and exiting the Park.</li> <li>• Adding additional pedestrian access at the center of the Park would direct less pedestrian traffic toward the vehicle entrances which would promote public safety.</li> <li>• Wider access points along Ala Moana Boulevard, across from new and existing developments, would encourage more pedestrian, and less vehicle traffic, from these high-density areas.</li> <li>• A rail station is proposed on the mauka side of the Ala Moana Center and near Pi'ikoi Street. A pedestrian crossing to the AMRP could benefit those using the rail for transportation to the Parks.</li> </ul>	<p><u>Mitigation:</u> Architectural Recordation: [Included in Canal Repairs Mitigation above]</p>
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Comments: In the historic 1931-32 and 1936 plans the Pi'ikoi entrance is the central focal point of the park opposite the Central Terrace.

*HHF concurs with the intent to implement this central pedestrian entrance, although within the larger context of developing the central axis across to the Central Terrace and Pergolas (item 2.3.13).*

- Proposed plan fails to address the space in between the Pi'ikoi entrance and the Central Terrace on axis at the beach
- The existing rock wall along Ala Moana Boulevard is historic, therefore removal would constitute an adverse effect
- The emphasis on pedestrian access is not consistent with the parking increases and roadway “improvements” which are driving the plan.
- The rendering presented in Figure 2-4 does not match the culvert/bridge design in Appendix D-3

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- The wide expanse of concrete shown in Figure 2-4 does nothing to create a “sense of entry” into this important urban space

*HHF concurs with the proposed boxed culvert and bridge railing design (Appendix D-3) enhanced with appropriate landscaping at Pi'ikoi.*

Historic Feature [Year built]	DEIS Proposed Work (from Table 4-3 / and Chapter 2)	DEIS Proposed Effect / Mitigation (from Table 4-3)
2.3.3 - Pedestrian Entrance Expansion – Queen Street Non-Historic	The [3] secondary main entrances could also alleviate pedestrian traffic congestion during large events like the 4th of July Fireworks Show or during an emergency.	<u>Effect:</u> N/A  <u>Mitigation:</u> N/A

Comments: Assuming that the Pi'ikoi entrance is developed into an inviting pedestrian entrance, the three remaining small bridge crossings (Ward block, Queen Street and Park Lane) should remain secondary, enhanced with landscaping, and not be relocated or widened.

The proposed Queen Street entrance lands the visitors behind the blank tennis court wall, which hardly provides a ‘sense of entry.’ *HHF disagrees with widening this secondary entrance leading to a blank wall.*

Historic Feature [Year built]	DEIS Proposed Work (from Table 4-3 / and Chapter 2)	DEIS Proposed Effect / Mitigation (from Table 4-3)
2.3.13 – High Spot Improvements / Central Terraces, Pergolas 1932	<p>“No work” per Table 4-3</p> <p>Mention of the “High Spot” was recorded in earlier documents and was referred to as the “central terrace.” This was part of the Richard and Thompson design. The “terrace” was described as “raised with a retaining wall.”</p> <ul style="list-style-type: none"> <li>• The High Spot offers a larger picnicking area with closer beach access and an ocean view.</li> <li>• Today, the High Spot is underutilized due to broken amenities (picnic benches) and access issues.</li> <li>• The stairs leading to the raised area are narrow, uneven, and difficult to use for those using wheelchairs and strollers.</li> <li>• The trees around the High Spot are overgrown and would need maintenance.</li> </ul>	<p><u>Effect:</u> N/A per Table 4-3</p> <p><u>Mitigation:</u> N/A per Table 4-3</p>

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	<ul style="list-style-type: none"> <li>The City proposes to bring people back to this area by adding an ADA-compliant ramp in place of the stairs and to restore the picnicking areas by adding more benches and sitting areas.</li> </ul>	
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Comments: The original Central Terrace design in the 1931-32 park plan was on axis with a proposed central pedestrian entrance across from Pi'ikoi Street. (Figure 24 – Appendix D-2). In the 1936 McCoy/Bent design it was flanked by pergolas with trees and trellises (Figure 36 – Appendix D-2).

*HHF disagrees with the description of “no work” in Table 4-3 as it is contradicted by section 2.3.13 of the “Proposed Action” list where alterations are proposed to character-defining features of the historic Central Terrace and Pergolas.*

*HHF concurs that this Central Terrace and the adjacent Pergolas features of the park should be repaired and adapted to contemporary uses in conjunction with the Shared Use Path (2.3.6), and the proposed Pi'ikoi Pedestrian Entrance (2.3.3). Appropriate rehabilitation should include:*

- Replace missing trellises
- Restore historic walls and steps
- Provide ADA access with minimal alteration to historic features, separate from the restored stairs
- Design a connection to the proposed Pi'ikoi pedestrian entrance as envisioned in the 1936 Plan complete with hardscape, water features and landscaping.

Historic Feature [Year built]	DEIS Proposed Work (from Table 4-3 / and Chapter 2)	DEIS Proposed Effect / Mitigation (from Table 4-3)
Landscaping and Vegetation	See Banyan Court, Looped Drive, and Keyhole Parking for information	<u>Effect:</u> See Banyan Court, Looped Drive, and Keyhole Parking for information
ca. 1932		<u>Mitigation:</u> See Banyan Court, Looped Drive, and Keyhole Parking for information

Comments: Proposed work in all three areas consists of significant removal of trees, some exceptional, with no plan to replant.

*HHF strongly disagrees with this component of the Proposed Action.* A significant missing component of the “Master Plan” is a master landscaping plan, even if proposed for implementation in phases, prepared by a landscape architect meeting the SOI professional qualifications. Any tree removal should require a one-for-one replacement policy.

Historic Feature [Year built]	DEIS Proposed Work (from Table 4-3 / and Chapter 2)	DEIS Proposed Effect / Mitigation (from Table 4-3)
Spatial arrangement;	“no work” per Table 4-3 and not listed in “Proposed Action” list in section 2.3	<u>Effect:</u> N/A per Table 4-3 <u>Mitigation:</u> N/A per Table 4-3

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Alternating areas of foliage and open space		
ca. 1932		

Comments: *A significant missing component of the Ala Moana Plan is the lack of an overall landscape master plan, prepared by a landscape architect meeting the SOI professional qualifications.*

<b>Historic Feature [Year built]</b>	<b>DEIS Proposed Work (from Table 4-3 / and Chapter 2)</b>	<b>DEIS Proposed Effect / Mitigation (from Table 4-3)</b>
2.3.7 Entry Portals / Scalloped Walls (Roosevelt Portals)	Maintenance repairs to the Roosevelt Portals are proposed to restore and preserve their historic character.	<u>Effect:</u> Yes
1934	<ul style="list-style-type: none"> <li>• A corrosion-inhibiting concrete penetrating sealer is the recommended material to be used by the structural engineers to protect the outer surface of the portals from moisture without disturbance to its historical nature.</li> <li>• A separate structural assessment was not completed</li> </ul> <u>Setting:</u> Figure 2-9 indicates proposed improvements to the entry site. <ul style="list-style-type: none"> <li>• #6 – Planting screen</li> <li>• #7 – Shade trees</li> </ul>	<u>Mitigation:</u> Preservation: City will ensure that repairs are done in an historically appropriate manner

Comments: *HHF concurs with the restoration/rehabilitation and long-term preservation of this important historic feature. However, the description of work falls short of including the related scalloped walls, plaza and restored planting. These elements should be included.*

A thorough structural investigation with repair methods should be performed in conjunction with an architect and/or engineer meeting the SOI professional qualifications.

- Repair materials, details and finishes should match the existing and comply with SOI Standards for Restoration.
- This analysis and repair, although not mentioned, should extend to the adjacent historic scalloped walls

Proposed Setting

- The purpose, location and nature of the proposed “planting screen” is not described. An introduced landscape feature should not obstruct the view of the portals. (Figure 2-9, item 60)
- The type and location of the proposed shade trees is not described. (Figure 2-9, item 7)

Introduction of street trees, and other landscape features, while not to be discouraged, should be developed within the context of an overall professionally designed, long-range landscape plan.

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<b>Historic Feature [Year built]</b>	<b>DEIS Proposed Work (from Table 4-3 / and Chapter 2)</b>	<b>DEIS Proposed Effect / Mitigation (from Table 4-3)</b>
2.3.9 - Equestrian (bridle) canal bridge 1934	<p>Per Table 4-3: Repairs to underside of bridge</p> <hr/> <p>Maintenance repairs to the Bridle Bridge are proposed to restore and preserve its historic character.</p> <ul style="list-style-type: none"> <li>• Details of the construction of the bridge are not available</li> <li>• A more recent structural assessment of the AMRP pedestrian bridges found the condition of the Bridle Bridge to be poor to fair.</li> <li>• It is recommended that repair of the Bridle Bridge with current industry standard materials be undertaken as soon as possible to stop the corrosion and repair the foundation.</li> <li>• A railing should be added as recommended, with the design to match that of the existing</li> </ul>	<p><u>Effect:</u> Yes</p> <hr/> <p><u>Mitigation:</u> Preservation: City will ensure that repairs are done in an historically appropriate manner</p>

Comments: *HHF concurs that this significant historic feature needs to be preserved and repaired; however, the proposed work falls short of the complete rehabilitation which is essential for the long-term preservation of this significant historic feature.*

- A thorough structural investigation and repair methods should be performed in conjunction with an architect and/or engineer meeting the SOI professional qualifications.
- Concur with a restoration with appropriate materials matching original design and finishes.
- Disagree with added height of railing. This safety feature, if required, should be a simple curved metal railing which is differentiated from, and secondary to, the historic concrete bridge

<b>Historic Feature [Year built]</b>	<b>DEIS Proposed Work (from Table 4-3 / and Chapter 2)</b>	<b>DEIS Proposed Effect / Mitigation (from Table 4-3)</b>
2.3.5 – Keyhole Parking Area ca. 1935	<p>Per Table 4-3: Change configuration of the historic keyhole layout; remove grassy open area and convert to formal parking lot. This parking area contains two exceptional trees.</p> <hr/> <p>Scope: Reconfigure McCoy Pavilion, “keyhole”, parking to optimize the number of parking spaces.</p> <ul style="list-style-type: none"> <li>• Three parking layouts were considered</li> </ul>	<p><u>Effect:</u> Yes</p> <hr/> <p><u>Mitigation:</u> Architectural Recordation: -Addendum to HALS HI-21 (4 large-format shots)  Preservation:</p>



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	<ul style="list-style-type: none"> <li>Originally the keyhole area was chosen to replace the makai parking along the beach drive.</li> </ul>	<ul style="list-style-type: none"> <li>Exceptional trees will be avoided. Layout along 'Ewa side revised from original proposal to avoid work within tree driplines; stall count reduced by 27.</li> </ul>
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Comments: *HHF disagrees that this significant historic feature is an “underutilized” area and thus should be to be sacrificed to added parking.*

This relatively intact driveway loop is one of the earliest features of the park to be installed adjacent to the Sports Pavilion, as depicted in a 1935 photograph showing construction of the Sports Pavilion (Appendix D-3, page 16,). There is ample documented evidence of the keyhole design for recreational use dating back to the 1936 McCoy plan.

- The Ala Moana Park website lists three picnic sites within the keyhole area (sites 19, 20 & 21) (Appendix D-2, figure 4).
- The least bad parking option is Option 3, which retains the circular keyhole layout and loses only 7 parking stalls compared to the destructive Option 2 plan.
- Of consideration are the observations noted in the Parking Study (Appendix C) which show the greatest need for parking at the far west end of the road and the Magic Island areas, not the McCoy Pavilion area.
- Rationalization for increased parking is in conflict with discussion of encouraging pedestrian traffic at proposed Pi'ikoi entrance and with City's TOD intention to encourage rail travel over private vehicles.

Historic Feature [Year built]	DEIS Proposed Work (from Table 4-3 / and Chapter 2)	DEIS Proposed Effect / Mitigation (from Table 4-3)
Sports Pavilion 1937	“no work” per Table 4-3 and not listed in “Proposed Action” list in section 2.	<u>Effect:</u> N/A per Table 4-3 <u>Mitigation:</u> N/A per Table 4-3

*This singularly historic feature should be rehabilitated following historic preservation standards.*

- Note that the “no work” statement is in conflict with Section 7.1.2 “Impacts on the Natural Environment” which states that “McCoy Pavilion and Banyan Court Plaza will be ... repaired and renovated to the original condition.”<sup>2</sup>

Historic Feature [Year built]	DEIS Proposed Work (from Table 4-3 / and Chapter 2)	DEIS Proposed Effect / Mitigation (from Table 4-3)
Banyan Courtyard 1937  2.3.12 – McCoy Pavilion and Banyan Court Renovation 1975	McCoy Pavilion and Banyan Court was once known as the “Sports Pavilion and Banyan Court” before it was renovated and reopened in 1978. The renovations were mostly done for the Sports Pavilion and they included: meeting rooms, a large auditorium to host events, dining hall, kitchen, dressing room, 10 restrooms, administrative offices and	<u>Effect:</u> Yes <u>Mitigation:</u> Architectural Recordation: Addendum to HALS HI-21 (6 large-format shots) • Plant four new banyans where four large Exceptional banyans will be removed. (Table 4-3)

<sup>2</sup> DEIS Chapter 7, Summary of Impacts, p. 7-4



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	<p>storage, 10 tennis courts, and open outdoor lanai areas. The Banyan Court and McCoy auditorium have the most damage due to the banyan tree roots growing under them.</p> <ul style="list-style-type: none"> <li>• In order to address the physical condition of the courtyard and auditorium, the City proposes to remove the four exceptional banyan trees in the courtyard.</li> <li>• An update to the kitchen and dining facility is also proposed.</li> <li>• Plans to add a restaurant and more food vendors could be considered in the long-term future.</li> <li>• Planting of a replacement tree(s) will also be considered.</li> </ul>	
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Comments: The description of McCoy Pavilion in 2.3.12 as the renovation of the historic Sports Pavilion and conversion to auditorium and related spaces is completely incorrect. Furthermore, plans to update the dining facilities and kitchen, which may also affect the Historic Sports Pavilion, have been deferred to a later date.

*HHF strongly objects to omitting the rehabilitation/preservation of this original, and most significant building in the park, from what purports to be a long-term plan for the treatment of a significant historic resource.*

Historic Feature [Year built]	DEIS Proposed Work (from Table 4-3 / and Chapter 2)	DEIS Proposed Effect / Mitigation (from Table 4-3)
Tennis Courts 1937	“no work” per Table 4-3 and not listed in “Proposed Action” list in section 2.	<u>Effect:</u> N/A per Table 4-3 <u>Mitigation:</u> N/A per Table 4-3

Comments: HHF agrees with avoiding impacts to this historic feature.

Historic Feature [Year built]	DEIS Proposed Work (from Table 4-3 / and Chapter 2)	DEIS Proposed Effect / Mitigation (from Table 4-3)
2.3.17 - Lawn Bowling Green 1939 Renovated 1966-67	<p>“no work” per Table 4-3 and not listed in “Proposed Action” list in section 2.</p> <p>The Lawn Bowling facility was installed during the original establishment of the Park’s recreational amenities in the late 1930s. It was another design by Harry Sims Bent.</p>	<u>Effect:</u> N/A per Table 4-3 <u>Mitigation:</u> N/A per Table 4-3

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	<ul style="list-style-type: none"> <li>• Like the playground, immediate plans for the multiuse facility are not imminent.</li> </ul>	
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Comments: *It is essential that any master plan for the Ala Moana Park include coordination between the historic Lawn Bowling facility, the “Keyhole Area” and the Sports Pavilion / Banyan Court / McCoy Complex.*

**Additional proposed work with potential to affect historic resources:**

Feature	DEIS Proposed Work	HHF Comments
2.3.8 - Kamakee Street Entrance	<p>Plans for the Kamakee Street Entrance were included with earlier design plans, but were never implemented.</p> <p>The coral walls that border the entryway are historic, but understated in comparison with the Park’s historic theme.</p> <p>The proposed plan is a new entry gate that would complement the Roosevelt Portals at the Atkinson Drive Entrance (Figure 2-10).</p> <ul style="list-style-type: none"> <li>• The updated entry would include a new park sign and designed wall over the existing coral wall to emphasize the area.</li> <li>• Entry portals for the pedestrian entrance are also proposed.</li> </ul> <p>The landscaping around the entryway will be included in the update.</p>	<p><b><i>HHF concurs with creating a secondary sense of entry at the Kamakee Street end of the Park.</i></b></p> <p>The existing historic low rock walls should not be altered. (Standard #9)<sup>3</sup></p> <ul style="list-style-type: none"> <li>• New walls, entry portals and signage should complement the historic, but be differentiated.</li> <li>• Complementary design of added features and landscaping should be performed in conjunction with an architect and a landscape architect meeting the SOI professional qualifications.</li> <li>• Provide the original proposed plans for this entrance</li> </ul>

Feature	DEIS Proposed Work	HHF Comments
2.3.15 - Proposed Playground	<p>The immediate goals of the master plan are to address the condition of the existing facilities of the Parks before adding larger scale amenities.</p> <ul style="list-style-type: none"> <li>• Plans for the playground are currently being considered with a potential sponsor.</li> </ul> <p>The playground is proposed between the Diamond Head concession building and the Hawaiian Pond. This area is currently not an active area of the Park.</p>	<p>HHF is concerned about the safety of locating a children’s playground next to an open water source. The historic feature of the lagoon includes open access with no vertical barriers, like fences. The playground will either need to be</p>

<sup>3</sup> Standard 9: “...new construction will not destroy historic materials, features and spatial relationships that characterize the property.”

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		fenced or should be relocated to a safer area.
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<b>Feature</b>	<b>DEIS Proposed Work</b>	<b>HHF Comments</b>
2.3.11 – Canoe Hālau Crossing and Canoe Launch Ramp	<p>The Canoe Hālau building was completed within the last 10 years and it is located near the Atkinson Drive entrance to the AMRP and the Ala Wai Boat Harbor. Canoe paddling was gaining popularity which prompted public need for a new canoe storage facility.</p> <ul style="list-style-type: none"> <li>• The canoe launch is located across Ala Moana Park Drive from the hālau.</li> <li>• Currently, the canoe paddlers are crossing Ala Moana Park Drive with large canoes causing safety and traffic concerns.</li> <li>• The current launch ramp is proposed to be replaced with two longer concrete ramps for easier access to the water.</li> </ul> <p>Other proposed improvements could include additional landscaping along the boat harbor side of the road such as trees and seating areas.</p>	<p>The location of the Canoe Hālau near the historic Hawaiian Pond presents a good opportunity to incorporate aspects of both along with appropriate landscaping and other amenities as a coordinated whole.</p> <ul style="list-style-type: none"> <li>• The crossing and launch ramp need to be coordinated with the Magic Island Shared Use Path, parking and landscaping into an overall addition to the Ala Moana Park Master Plan.</li> </ul>

<b>Feature</b>	<b>DEIS Proposed Work</b>	<b>HHF Comments</b>
2.3.16 - Relocate Maintenance Base Yard	Relocation of the maintenance base yard to a more central location in the AMRP is considered, but will be a long-term project. The details of the relocation have not been designed or determined	Key historic features of the park are located in the central section. Planning for a Base Yard Facility needs to be incorporated into the overall land use planning, design and landscaping to avoid future conflicts of space allocation and recreational use of the park.

<b>Feature</b>	<b>DEIS Proposed Work</b>	<b>HHF Comments</b>
2.3.18 - Relocate Ocean Safety Office	Relocation of the Ocean Safety headquarters has been discussed and brought to the attention of the landowner during the outreach meetings, but it is considered a long term project. The details of the relocation have not been designed or determined.	As with the Maintenance facility, plans for relocation of the safety office need to be incorporated into the overall land use planning, design and landscaping to avoid future conflicts of space allocation and recreational use of the park.