

HISTORIC HAWAII FOUNDATION

December 7, 2018

The Honorable Kirk Caldwell
Mayor, City & County of Honolulu
c/o Department of Design and Construction
650 S. King Street, 11th Floor
Honolulu, HI 96813

**RE: Draft Environmental Impact Statement (DEIS)
Waikiki War Memorial Complex (WWMC)
Honolulu, Hawai'i
TMK: (1) 3-1-031:003, 009, 010**

Dear Mayor Caldwell:

Historic Hawai'i Foundation is providing comments on the draft environmental impact statement (DEIS) developed in accordance with Hawai'i Revised Statutes (HRS) §353 and addressing historic preservation considerations in accordance with HRS §6E. The DEIS evaluates a proposed treatment to remedy the current deteriorated condition of the Waikiki War Memorial Complex, aka the Natatorium, in a manner that renews the memorial to World War I veterans and reestablishes public access to this portion of Kapi'olani Regional Park.

Historic Hawai'i Foundation (HHF) is a statewide non-profit organization that encourages the preservation of buildings, structures, sites and objects that are significant to the history of Hawai'i. HHF has been a stakeholder in discussions related to the Natatorium for four decades, and remains an interested and concerned party for the preservation and appropriate rehabilitation of this historic site.

Historic Hawai'i Foundation strongly supports the Preferred Alternative, called the "Perimeter Deck" alternative. The proposed course of action addresses the need to improve safety, restore public access, limit environmental effects, honor the legacy of veterans and the history of World War One, and comply with historic preservation standards.

Identification and Treatment of Historic Properties

The Waikiki War Memorial Natatorium opened in 1927 as a "living memorial" to those who served in World War I from Hawai'i. The structure is significant for its long history as a swimming venue and its association with legendary watermen Duke Kahanamoku, Buster Crabbe and Jonny Weismuller. It is listed on the National and Hawai'i State Registers of Historic Places for both its historic and architectural significance. It has been closed since 1979.

The DEIS includes a list of character-defining features of the Natatorium's design. HHF agrees with the description of these features, which will serve as the baseline for application of historic

Historic Hawai'i Foundation
Comments on Draft Environmental Impact Statement
Waikiki War Memorial Natatorium
December 7, 2018
Page 1 of 3

preservation standards and guidelines in accordance with the Secretary of the Interior's Standards for the Rehabilitation of Historic Properties (SOI Standards).

Additional historic properties in the study area include Kapi'olani Regional Park and a subsurface archaeological site (Site # 50-80-14-7211). The park was established in 1877 and was listed on the state register of historic places in 1992. The pre-contact cultural site includes scatter of small artifacts that date to 1460-1650. The proposed project will not have an adverse effect on either resource.

There are also designated Exceptional Trees within the project study area, which are to be protected and avoided both during construction and in the final condition after the project is completed.

DEIS and Preferred Alternative

The purpose of the EIS is to assess and recommend projects to renew the memorial and re-establish public access to this area of Kapi'olani Park. The DEIS examined four alternatives:

1. Perimeter Deck (Preferred)
2. War Memorial Beach
3. Closed System Pool
4. No Action

The Perimeter Deck alternative was developed in response to the requirements of HRS §6E to consider alternatives that do not adversely affect historic resources, while also addressing the requirements of the Hawai'i Department of Health (DOH) Rules on Public Swimming Pools (Hawaii Administrative Rules §11-10) to address standards for public health. Public interest also favored retaining the adjacent beach, which has accrued over the past 90 years due to the presence of the Natatorium's seawall.

The Perimeter Deck balances these considerations:

- By removing the below-water seawalls on two sides, the swimming basin will use the natural waves and currents of the ocean to refresh the water. Water quality will match that of the Pacific Ocean. DOH has vetted and confirmed that this solution complies with its rules.
- The retention of the landward elements of the bleachers, arch, restrooms, operational spaces and other design elements will comply with the SOI Standards and meet the requirements of HRS §6E. A new deck constructed over the makai and 'Ewa piles will provide a surface perimeter while still allowing water circulation below. The perimeter deck will match the shape, configuration and size of the deck in the historic plan, although the subsurface engineering will be modified to address the other concerns. Historic preservation standards accept this approach as a rehabilitation treatment to make a historic structure compatible with contemporary needs in a harmonious way.
- By retaining the Diamond Head groin and lower portion of the seawall, the adjacent San Souci Beach will be retained rather than wash away.

The Perimeter Deck alternative was selected as the preferred option because it outperformed the other options across all measures, including environmental effects, historic preservation and socio-economic impacts. This alternative is also expected to cost the least with estimated capital costs of \$25.6 million, compared to \$28.8 million for the beach-construction alternative and \$42.7 million for building a closed pool system.

HHF Comments

Historic Hawai'i Foundation commends the City for its response to public comment during the scoping phase, which overwhelmingly supported inclusion of a "rehabilitation" alternative that avoids demolition of the historic structure while also addressing concerns for functionality, water quality and cost.

The resulting Perimeter Deck solution is a reasonable compromise that balances the needs and issues for this site. HHF supports this alternative and hopes to see it move forward to implementation.

We look forward to continuing to work with the City and other stakeholders as the conceptual Perimeter Deck alternative is further developed into schematic design and implementation.

Very truly yours,



Kiersten Faulkner, AICP
Executive Director

Copies:

Mr. Lansing Sugita
City & County of Honolulu
Department of Design & Construction
650 S. King Street, 11th Floor
Honolulu, HI 96813
Lansing.Sugita@honolulu.gov

Ms. Lesley Matsumoto
AECOM Technical Services, Inc.
1001 Bishop Street, 16th Floor
Honolulu, HI 96813
WMCNatatorium@aecom.com