

HISTORIC HAWAII FOUNDATION

680 Iwilei Road Suite 690, Honolulu HI 96817 • (808) 523-2900 • preservation@historichawaii.org • www.historichawaii.org

TO: **Department of Planning and Permitting**
City & County of Honolulu
650 S. King Street, 7th Floor
Honolulu, HI 96813

FROM: **Historic Hawai'i Foundation**
Kiersten Faulkner, Executive Director

RE: **Special Management Area Use Permit No. 2019/SMA-36**
Ala Moana Regional Park and Magic Island Improvements
Honolulu, Island of O'ahu
TMK: (1) 2-3-037:001, 002, 022, 023, 025

HEARING: **Wednesday, December 18, 2019**
10:30 a.m.
McCoy Pavilion, Ala Moana Regional Park, 1201 Ala Moana Blvd, Honolulu, HI 96814

Historic Hawai'i Foundation is submitting comments in **opposition** to the Application for a Special Management Area (SMA) Use Permit from the Department of Design and Construction (DDC) for the proposed park and facilities improvements at Ala Moana Regional Park (AMRP) and Magic Island as described in the Final Environmental Impact Statement, accepted on August 12, 2019.

Summary of HHF Comments and Concerns

Historic Hawai'i Foundation opposes the issuance of the SMA Permit due to discrepancies, contradictions and gaps between the SMA Application, the Final Environmental Impact Statement (FEIS) and the City's submittal to the State Historic Preservation Division of the Department of Land and Natural Resources under HRS 6E-8. The project will inflict adverse effects on numerous historic properties and contributing features of the park, and the application lacks specific measures to avoid or minimize the effects.

Interests of Historic Hawai'i Foundation

Historic Hawai'i Foundation (HHF) is a statewide non-profit organization established in 1974 to encourage the preservation of sites, buildings, structures, objects and districts that are significant to the history of Hawai'i.

HHF 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 project description in the SMA Application—which includes by reference the descriptions in the Final Environmental Impact Statement (FEIS)—is not based on historic preservation standards, guidelines and best practices.

Purpose of the Special Management Area Program and Permit

Under Section §205A-2 of the Coastal Zone Management Program, Objectives and Policies are set out that clearly address historic resources within the Coastal Zone Management Area:

- (a) The objectives and policies in this section shall apply to all parts of this chapter.¹
- (b) Objectives
 - (2) Historic resources
 - Protect, preserve, and, where desirable, restore those natural and manmade historic and prehistoric resources in the coastal zone management area that are significant in Hawaiian and American history and culture.
- (c) Policies
 - (2) Historic resources
 - A. Identify and analyze significant archaeological resources;
 - B. Maximize information retention through preservation of remains and artifacts or salvage operations; and
 - C. Support State goals for protection, restoration, interpretation, and display of historic resources. [Emphasis added]

The stated purpose of the SMA Use Permit is that:

“The legislature finds that, special controls on developments within an area along the shoreline are necessary to avoid permanent losses of valuable resources and the foreclosure of management options...”²

Project Area, Historic Properties and Cultural Resources

The Project Area includes the entire Ala Moana Park and Magic Island Peninsula (Tax Map Keys 2-3-37:001, 002, 022, 023 & 0025). Of the project area, the historic Ala Moana Park (TMK 2-3-37:001) is the portion listed on the Hawai'i Register of Historic Places.

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.

¹ Hawai'i Revised Statutes, Chapter 205A, Coastal Zone Management, Section 205A-2 Objectives and Policies

² HRS Chapter 205A, Section 205A-21

The City did not evaluate the other areas or features for historic significance that may be associated with other eras and criteria for listing on the Hawai'i and National Registers of Historic Places.

Project Summary & HHF Comments

Project Scope: The project scope has been described differently throughout the environmental documents and submittals, with significant discrepancies between the reports on both the scope of the projects and the effects on resources.

A. Draft Environmental Impact Statements (2)

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.” [DEIS]³

The DEIS included a list of 20 proposed projects. Of these, six (6) were submitted to the State Historic Preservation Division for review and concurrence. Another four (4) projects with the potential to affect historic properties were not submitted to SHPD and did not receive State concurrence.

B. Final Environmental Impact Statement

“[T]he master plan proposes expansion of existing facilities, rehabilitation of the historic structures, and new facilities that are allowed in City 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 revitalization is to maintain and improve the grounds and facilities while remaining true to its local character as ‘The People’s Park’”⁴ [FEIS]⁵ (emphasis added).

The FEIS included a list of 19 proposed projects (dropping one and adding two since the DEIS). Of these, six (6) affect historic properties and include conditions set by SHPD, and four (4) propose “no work” to historic properties. Another four (4) projects affecting historic properties were not included in SHPD’s review and did not receive State concurrence.

C. SMA Permit Application

“The objective of the [SMA] Applicant [DDC] is to pursue improvements to address repair and maintenance issues on the existing historic structures to honor its character-defining features and also include long-term and short-term development projects that will meet the evolved program dynamics of the Park since it now functions as a venue for large permitted activities in Honolulu that attract participants worldwide” [SMA]⁶ (emphasis added).

The SMA included a list of 17 proposed projects. Of these, 17 were included in the FEIS, and four (4) were included in the SHPD review and concurrence with conditions.

³ DEIS, Section 1.3 Purpose and Need, p. 1-5

⁴ FEIS Chapter 1, Section 1.3.2 (footnote) Named “The People’s Park” by President Franklin Delano Roosevelt in 1934

⁵ FEIS Section 1.3.2 Purpose, p. 1-6.

⁶ SMA Permit Application, October 2019; Section 2.1 Statement of Objective, p. 1.

The SMA included new projects that were listed in the FEIS as “no work”. The SMA also included six (6) projects that did not address SHPD’s conditions, and removed 2 projects that had been in the FEIS but were not carried forward to the SMA.

SMA Scope

The SMA application includes 17 projects to be implemented over the span of 10 years to improve the Park’s grounds and facilities; the application refers to the FEIS for full written description of each project.⁷ These projects include:

1. Add a dog park near Kewalo Basin;
2. Improve the pond edges and paths;
3. Pi’ikoi Street and Queen Street pedestrian entrance expansions and partial drainage canal cover;
4. Keyhole parking lot expansion and reconfiguration;
5. Add loading and unloading zones near crosswalks on makai side of Ala Moana Park Drive;
6. Reconfigure parking on the mauka side of Ala Moana Park Drive to add more stalls;
7. Reconfigure and expand Magic Island parking lot;
8. Repair Roosevelt Portals at Atkinson Street entrance;
9. Improve Kamake’e Street entrance;
10. Improve the existing canoe launch ramp and crossing from the Canoe Hālau;
11. Renovate McCoy Pavilion and the Banyan Courtyard;
12. Improve “High Spot” terrace for ADA access and widen the shared-use paths on both sides;
13. Sand replenishment and long-term beach nourishment;
14. Build a playground;
15. Relocate the maintenance yard;
16. Create a multi-use facility at the lawn bowling area;
17. Relocate Ocean Safety’s Staff Office Ala Moana beach operation’s office to the maintenance yard when it becomes available.

The FEIS identified two additional projects affecting significant historic features, neither of which is included in the SMA application: repair of the canal walls and the repair of the Bridle Bridge.

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.

Since the SMA permit refers back to the Final EIS for “full written description of each project,” HHF’s comments pertain to those sections of the Final EIS that address the historic resources within the park.

⁷ SMA Permit Application, October 2019; Section 2.2 Statement of Concept, p. 1.

Historic resources are addressed in the Final EIS in three sections:

A. Section 4.4 Architectural Resources Table (4-3):

The final EIS includes an Architecture Resources Table (4.3)⁸ which identifies 14 historic resources within the park. Within the table are summaries of the proposed work, evaluation of effect on the resource and proposed mitigation. Of the 14 historic resources listed, nine [9] correspond to the 17 projects in the SMA list above.

Of the nine, three (3) are listed as “No work” and thus no effect or proposed mitigation:

- Central Terraces, Pergolas (#12 High Spot)
- Sports Pavilion (#11 McCoy Pavilion)
- Lawn Bowling Green (#16 Multi-use Facility)

HHF Comment: Of the 14 identified historic resources, evaluation and project effect are discussed for only six. The FEIS says no work is being done on the three projects; however, the SMA application states that work will include major capital changes and effects on the historic fabric. Therefore, the SMA’s reliance on the FEIS description of the proposed work is inaccurate.

HHF Comment: The SMA’s description of the work at the three locations includes significant demolition and destruction of historic character-defining features. There are no references to applying appropriate preservation standards. Therefore, the SMA does not meet the requirements for treatment of historic properties.

HHF Comment: The list of 14 historic resources includes the spatial arrangement of open space and foliage, as well as the landscaping, open lawns, exceptional trees and other vegetation. The SMA proposes adding major new facilities, including the multi-use area at or near the historic lawn bowling green, the proposed playground, and the proposed dog park, and the proposed relocation of maintenance facilities. The direct, indirect and cumulative effect of the major new construction would obliterate the open space design and spatial relationships. These open areas, vistas and trees are important elements of the historic park design.

B. Appendix D-3 Cultural Impact Assessment:

This extensive report and analysis is primarily focused on Archaeological resources and cultural history. There is a section on the historic evolution of the park in section 4.3 which touches on the early development of the original features. The information is primarily sourced from Robert Weyeneth’s (1987) book “Ala Moana: The People’s Park”.

C. Appendix D-4 Historic Feature Review and Retrofit Assessment:

We infer that Appendix D-4 is intended to satisfy the commitment to “identify and evaluate all historic structures.” Six historic resources actually listed and evaluated are:

⁸ SMA Permit Application, Section 4.4.3 Architectural Resources, pp 4-22 through 4-25.

- Drainage canal;
- Japanese Pond
- Hawaiian Pond
- McCoy Pavilion parking area (Keyhole)
- Repair of the Bridle Bridge and
- Roosevelt Portals

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 six of the identified 14 historic features within the park, 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 that the full identification of historic features proceed in accordance with professional standards and scope, 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.

HRS 6E-8 Historic Preservation Review

The SMA permit states in Section 3.11.2 that, “Some of the architectural features as noted above will be impacted by the project and appropriate mitigation was proposed for each impact. Based on a pre-consultation meeting with the State Historic Preservation Division (SHPD), the City is proposing both Preservation and Architectural Recordation as mitigation for the proposed work. The mitigation proposal under review per Chapter 13-375-8, HAR was accepted by SHPD”⁹ (emphasis added).

This is a gross overstatement of the status of the historic preservation review. In actual fact, SHPD’s review of projects (June 18, 2018) addressed only four of the 17 projects:

- Access along Ala Moana Boulevard
- Edge conditions of Hawaiian and Japanese Ponds
- “Keyhole” parking area
- Repair of Roosevelt Portals

The SHPD letter also references two additional projects (repair of canal walls and Bridle Bridge) that are not included in the SMA list of projects.

Furthermore, SHPD’s follow-up letter (May 15, 2019) reiterated that:

“The agreed upon mitigation also included the the DDC will ensure that repairs will be made in a historically appropriate manner at the portals, underside of the bridle bridge, and the canal walls and the two non-historic pedestrian bridges across the canal (1994) will be removed. All work will be

⁹ Letter from Alan Downer, PhD (Deputy State Historic Preservation Officer, Administrator, State Historic Preservation Division) to Robert Kroning (City Department of Design and Construction, Director) historic preservation review pursuant to Hawai’i Revised Statutes Chapter 6E-8 and Hawai’i Administrative Rules Chapter 13-275-3. June 18, 2018.

completed by a historical architect meeting the Secretary of the Interior's (SOI) Professional Qualifications for the historic architecture" (emphasis added).

The SMA permit application (Section 2.2) refers to professional qualifications for an "architectural historian," which is a separate discipline from the requirement to use the services of an "historical architect." The SMA also fails to reference to the mitigation requirements for preservation standards to be used in the design and treatment of the listed properties.

Therefore, the SMA permit does not reflect SHPD's conditions for concurrence.

Conclusions

Due to the considerable discrepancies, contradictions and gaps between the SMA Application and the Final EIS scope of work, as well as the inadequate compliance with the required historic review process under 6E-8 and HAR Chapter 13-275-8, Historic Hawai'i Foundation strongly opposes the issuance of the SMA permit.

HHF supports many elements of the proposed Park improvements, including increased staffing and maintenance; 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.

The Applicant has not met the requirements for a complete, cohesive description of the work, and the proposed plan does not meet the intent of the SMA statute to safeguard resources.

Therefore, Historic Hawai'i Foundation recommends that the SMA Permit be denied.

Thank you for the opportunity to comment.