

# HISTORIC HAWAII FOUNDATION

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December 3, 2019

Meredith Soniat  
Complete Streets Planner  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street  
Honolulu, Hawai'i 96813

Via email: [completestreets@honolulu.gov](mailto:completestreets@honolulu.gov)

Re: Proposed Ala Wai Bridge (Ala Pono: An Ala Wai Crossing)  
Public Review Draft - Alternatives Analysis Report  
Honolulu (Kona) District/ Waikiki, Pālolo, Makiki, and Mānoa Ahupua'a/Island of O'ahu  
TMK: Various

Dear Ms. Soniat,

Thank you for referring the above-mentioned project to Historic Hawai'i Foundation (HHF) as part of the pre-consultation for Hawai'i Revised Statutes (HRS) Chapter 343 Environmental Assessment. HHF received your email of November 22, 2019 requesting comments, containing a draft of the Ala Wai Alternatives Analysis and Executive Summary.

Historic Hawai'i Foundation 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. HHF is an organization with a demonstrated interest in the undertaking and a concern for the effects on historic properties.

## **Project Scope**

The Ala Wai Canal Bridge Alternatives Analysis is part of several companion efforts under the Complete Streets program where improvements to O'ahu's transportation system are proposed for all modes of travel [PBR Letter of November 8, 2018].

The overall project purpose is to "identify, develop, and evaluate alternatives to determine whether and how to provide additional access over the Ala Wai Canal that will provide a connection between the Waikiki, Ala Moana, and McCully / Mō'ili'ili neighborhoods."

"Ala Pono's primary purpose is to improve multimodal network connectivity and enhance public safety for people walking and bicycling. The secondary purposes are to assure comfortable,

sustainable mobility options that enhance economic vitality, environmental health, and social equity.” [ Executive Summary, November 2019]

Alternatives that were considered in the analysis included:

- A new bridge for pedestrians, bicycles, and emergency response [Preferred Alternative]
- Modifications or enhancements to one or more of the existing bridges
- Other modal crossings options and
- Consideration of no change

### **Identification of Historic Resources:**

The Ala Wai Canal was constructed between 1921 - 1928 by Walter F. Dillingham. The Ala Wai Canal serves as an essential drainage way and sedimentation basin for the approximately 19 square-mile Ala Wai Watershed.

The Ala Wai Canal is a listed historic property on the Hawai‘i Register of Historic Places (SIHP # 50-80-14-9757) and is eligible for listing on the National Register. The Mānoa-Pālolo Drainage Canal (MPDC), constructed in 1935-1936, is eligible for listing on the National and State Registers under Criteria A and C.

In addition to the Ala Wai Canal and the MPDC, other properties within the study area that are eligible for the National Register include:

- Kalākaua Avenue Bridge
- McCully Street Bridge, and
- Ala Wai Club House, which is listed on the Hawai‘i Register, is nearby

Hawai‘i Department of Transportation (HDOT) categorized the Kalākaua Avenue and McCully Street Bridges as “High Preservation Value” in the State Historic Bridge Inventory. That designation conveys a higher level of evaluation and treatment, as the clear intention is to preserve and rehabilitate High Preservation Value bridges. The City’s Department of Design and Construction concurred with the study’s findings and recommendations.

***Eligible – High Preservation Value:** Bridges within this category include those that are generally unique or possess characteristics of a type and exhibit high degrees of historic integrity. These are recommended for listing on the Hawai‘i or National Register of Historic Places. HDOT must consider all feasible and prudent alternatives as required by Section 4F for the treatment of historic bridges deemed “eligible” and “high preservation value.” [Hawai‘i State Historic Bridge Inventory & Evaluation (2013), p. 1-10]*

We also note that the use of Federal funds for a transportation project will trigger Section 4F of the Department of Transportation Act (DOT Act) of 1966, which in turn requires “feasible and prudent alternates” to the “use” of a historic resource.

In previous comments, HHH strongly recommended avoidance of the McCully and Kalākaua bridges. **HHF is pleased that the Alternatives Analysis confirms that a new pedestrian bridge is preferred over alterations to the existing shared pedestrian/vehicle bridges.**

The study is somewhat unclear as to the actual alignment of the new bridge, as it appears that it must be located separately from HECO’s relocated cable, which is shown in the same alignment. We look forward to

clarification as to the actual alignment for both the bridge and the HECO cable, and resolving this conflict as design progresses.

### **Design Criteria for New Bridge and Avoiding Effect on Historic Features**

HHF reiterates its prior comment that all work affecting the walls, stairs, railings, bridges and other character-defining features of the historic Ala Wai Canal and other historic properties comply with the Secretary of the Interior’s Standards for Treatment of Historic Properties (SOI Standards).

The project needs to address context sensitive design to establish appropriate parameters for the scale, cross-section, railings, materials and other features of the new bridge. This will be important to ensure harmonious and compatible design over the Ala Wai and within these key view corridors.

The new bridge should reflect its own time and place, not replicate existing bridges or establish a false sense of history. However, oversized or overly elaborate structures should also be avoided. The new bridge should be elegant but **subordinate to the setting and context**. (Emphasis added)

HHF does not agree that the proposed Bifurcated Arch Bridge meets the threshold for “no adverse effect” to the historic Ala Wai Canal and associated viewshed. The touchdowns, access points, anchors and other structures appear to have direct physical impact (and potential destruction of) walls and railings. Both the footprint and profile are overly large and impactful, and are in no way subordinate or compatible with the historic setting.

Furthermore, the proposed design does not meet the “Community Preferred Bridge Experience” characteristics, including:

- Transparent / Low Profile – a more subtle bridge
- Unimpeded views to natural features
- Open feel and sense of connection to the surrounding landscape
- Modern or minimalist bridge character

**Therefore, Historic Hawai‘i Foundation recommends that a different design be developed.** Of the alternatives included in the draft report, the “concrete beam” design is more appropriate. It is unclear why the project team prioritized a preference for avoiding piers in the water over avoiding other effects.

### **Cumulative Effects on Historic and Cultural Resources**

With appropriate siting and design parameters, HHF does not have concerns with the concept of a pedestrian/bicycle bridge across the Ala Wai Canal.

However, HHF is concerned with cumulative effects to historic neighborhoods, buildings, sites and structures that occur under the guise of “economic enhancement.” We are alarmed with the stated intent to “support the regeneration and vibrancy of McCully, Mō‘ili‘ili and University neighborhoods” and to “unlock economic regeneration” (Ala Pono Fact Sheet Project Goals).

The project may create direct, indirect and/or cumulative effects on the Waikiki, Ala Moana and McCully/Mō‘ili‘ili neighborhoods. Numerous additional historic buildings and structures are present in these districts.

The Alternatives Analysis Report states that the next steps in developing the preferred alternative of the University Crossing include an urban design plan and a management plan for parking supply and demand.

**HHF notes that that further study is necessary to assess any effects on historic properties and neighborhood character that could occur as a result of additional development pressure or land use changes that are enabled by the new transportation connections. These direct, indirect and cumulative effects are tied to the project, and the project needs to take steps to avoid, minimize or mitigate such effects.**

Thank you for the opportunity to comment. Historic Hawai'i Foundation looks forward to continuing consultation.

Very truly yours,

A handwritten signature in cursive script that reads "Kiersten Faulkner".

Kiersten Faulkner, AICP  
Executive Director