

HISTORIC HAWAI'I FOUNDATION

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

April 22, 2021

Ms. Meredith Soniat
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawai'i 96813

Via email: Meredith.soniat@honolulu.gov

**Re: Proposed Ala Wai Bridge Project
Draft Environmental Assessment, Hawai'i Revised Statutes Chapter 343 and
National Environmental Policy Act
Waikiki Ahupua'a, Kona Moku, Island of O'ahu, State of Hawai'i
TMK: Various
Federal Aid Project No. TAP 0300 (159)**

Dear Ms. Soniat,

Historic Hawai'i Foundation (HHF) is providing comments on the Draft Environmental Assessment (DEA) and anticipated finding of no significant impact for the proposed Ala Wai Bridge Project.

Interests of Historic Hawai'i Foundation

Historic Hawai'i Foundation is a statewide nonprofit 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.

Proposing Agency and Action

The City and County of Honolulu (CCH) Department of Transportation Services (DTS), in partnership with the State of Hawaii Department of Transportation (HDOT) and the Federal Highway Administration (FHWA), is proposing a new pedestrian and bicycle bridge over the Ala Wai Canal in Waikiki on the Island of O'ahu. The DEA has been prepared in compliance with HRS Chapter 343, with CCH DTS as the proposing agency, and the National Environmental Policy Act (NEPA), with FHWA as the lead federal agency.

Project Purpose and Need

The DEA states that, “the purpose of the proposed project is to provide safe access for people traveling by foot or by bicycle across the Ala Wai Canal between Ala Moana Boulevard and the Mānoa/Pālolo Stream. The project’s goal is to improve multimodal network connectivity and enhance public safety for people walking and bicycling” (DEA Section 1.3.1, Page 2).

Bridge Design

The proposed bridge is a cable-stayed design with an asymmetric configuration that utilizes a main pylon sited on the mauka side of the canal. The proposed bridge would not physically adhere to the Ala Wai Canal walls and no permanent structures would be installed in the canal. On the mauka end of the bridge, a 180-foot tower would straddle a cast-in-place deck that would cantilever over the water. Some 26 cables and two backstay anchors would support the bridge. The makai landing would sit on the Ala Wai Promenade, incorporate a stair and a ramp, supported by a concrete abutment some 12.5-feet high, 15 feet wide and 172 feet in length. The ramp would cantilever over the canal floodwall by almost 10 feet.

Identification of Historic Properties and Cultural Resources

The DEA identifies historic properties and cultural resources within the project study area and Area of Potential Effect (APE). The architectural inventory assessed 30 architectural resources; of these, 12 properties were identified as listed on or meeting the criteria to be eligible for the Hawai‘i and/or National Registers of Historic Places. The archaeological literature review also identified a potential subsurface site (SIHP #50-80-14-5796) that would be affected.

Historic Hawai‘i Foundation agrees with the identification of architectural and archaeological resources in the area of potential effect.

The Cultural Impact Assessment Report (page 285) recommends that these properties also be assessed for National Register eligibility as potential Traditional Cultural Properties (TCP) for significance derived from the association with the beliefs, customs and practices of a living community of people that have been passed down through the generations, usually orally or through practices. While the cultural significance was identified in the CIA, there was a not a parallel assessment to determine whether or not the resources are also eligible for listing on the Hawai‘i and/or National Registers of Historic Places as TCPs.

HHF recommends that the canoe hale and associated site, the *Malia* canoe, the Ala Wai Canal and other sites and objects associated with paddling be evaluated for National Register eligibility in accordance with National Register Bulletin 38 for assessing TCPs.

Effects on Historic Properties and Cultural Resources

The DEA states that of the identified historic and cultural properties, the Ala Wai Bridge Project will adversely affect the historic characteristics of the Ala Wai Canal and may potentially affect the historic integrity of the Malia canoe.

HHF agrees that the project will have an adverse effect on historic properties. HHF recommends additional evaluation and assessment regarding the potential National Register-eligible TCP associated with the Native Hawaiian customary practice of paddling and whether the proposed bridge may also adversely affect that TCP.

The extant character-defining features of the Ala Wai Canal that convey its significance are a combination of physical and contextual environmental features:

“The most noticeable characteristics from a distance are; 1) the broad body of water channeled within it, and, 2) the open space above and around it. The virtually flat elevation of the canal and its adjacent embankments are well in keeping with the 25’ height limit (Land Use Ordinance Chapter 21-9.40), and the recommendations of the Diamond Head Special District Design Guidelines imposed upon the canal area.” (DEA Appendix B-1 p. 20)

Contextual and environmental character-defining features of the canal that would be diminished or altered by the project include:

- Continuous, uninterrupted open space and view planes across and along the waterway;
- Low-scale buffers and open space along each bank.

Contextual and environmental character-defining features of the *Malia* and the traditional cultural practice of paddling that would be diminished or altered by the project include:

- Alteration to the waterfront setting, including walkway, grassy open space and trees disrupted by a bridge structure 50-feet from the hālau;
- Intrusion on south-facing views of continuous open waterways and disruption of low-scale and open space feeling of the waterfront setting;
- Feeling of quiet open space would be affected by growth in visitors in close proximity to the canoe;
- Paddling activities would be directly impacted by relocation of docks and equipment, impacts to practice lanes, loss of access by effects to parking and traffic, and ability to transport canoes to the water.

Avoidance, Minimization and/or Mitigation Measures

The DEA anticipates that a Memorandum of Agreement will be developed in accordance with the National Historic Preservation Act Section 106 regulations (36 CFR 800) to resolve adverse effects. HHF is a consulting party to that process. Potential mitigation measures are outlined in the DEA, but the resolution of effects will occur via a separate agreement.

HHF notes that the potential mitigation measures may offset or moderate the effect to historic properties, but would not eliminate or avoid it. Therefore, HHF disagrees with the project finding that “the proposed project would not have a significant adverse effect on historic and cultural resources in the APE” (page 76).

The proposed project would both have an irreversible effect on a cultural resource and substantially affect scenic vistas and view planes.

Alternatives Analysis

The proposed bridge design is described in the 2019 Alternatives Analysis report as “creating a visible landmark.” Such an impact is antithetical to the Secretary of the Interior’s (SOI) Standards and Guidelines for the Treatment of Historic Properties with guidelines for new construction on or adjacent to a historic property.

HHF is extremely concerned that the project team did not select a design that avoids or minimizes effects on historic properties, despite there being other feasible and prudent alternatives that could meet the project purpose and need with much less impact.

Both the footprint and profile of the proposed bridge are overly large and impactful, and are in no way subordinate or compatible with the historic setting.

To minimize adverse effects to the Ala Wai Canal and its environment, and conform more closely to the Secretary of Interior’s Standards, HHF recommends design modifications to:

- Reduce the vertical height and thickness of the bridge structure as much as possible;
- Minimize any potential damage to, or obscuring of, the stone side walls lining the canal;
- Use a color for the bridge structure that blends with the character of the canal and/or its environment.(white and bright colors should be avoided).

Reducing the height, massing and overall scale of the structure could also result in a bridge more in context with the other bridges that span the Ala Wai Canal; minimize the overall visual impact on the historic setting and feeling of the Ala Wai Canal; allow for a more uninterrupted view of this open waterway (which includes views of Diamond Head), and better retain the appearance of the canal’s overall physical environment and integrity of feeling.

Therefore, Historic Hawai‘i Foundation recommends that a different design be investigated. Of the alternatives included in the draft report, the “concrete beam” design is more appropriate. While the DEA indicates that the Beam Bridge was eliminated from the alternatives because “it proved to be infeasible for implementation due to the need for piers in the water that may obstruct drainage and flood flows,” this assessment does not appear to respond to new information from the Army Corps of Engineers regarding the “Ala Wai Flood Risk Management Project Engineering Documentation Report” (July 16, 2020). It is unclear whether the limitation on piers in the water is still relevant.

Cumulative Effects

Several additional projects in the vicinity have the potential to affect the same historic properties, cultural resources and community setting, especially in combination. HHF is concerned the proposed Ala Wai

Bridge has not been coordinated with or assessed in combination with several additional proposed projects. These include:

- Ala Wai Flood Control Project with at least two alternate engineering studies, proposed by the Army Corps of Engineers (USACE)
- Ala Wai Boulevard reconfiguration, proposed by DTS Complete Streets
- Repair and reconstruction of Ala Wai Canal rock walls and steps, proposed by State of Hawai'i Department of Land and Natural Resources.

Both individually and in combination, each of these proposed projects has the potential to impose significant and irreversible effects on cultural resources. It appears that the various proposing agencies and accepting authorities are failing to coordinate and collaborate on the cumulative effects of these projects.

HHF looks forward to continuing consultation to resolve the adverse effects on historic and cultural properties. Thank you for the opportunity to comment.

Very truly yours,



Kiersten Faulkner, AICP
Executive Director

Cc: HDR, Inc., 1001 Bishop Street, Honolulu, HI 96813
Attn: Linda Fisher
linda.fisher@hdrinc.com

Federal Highway Administration, Hawaii Division
ATTN: Meesa Otani, Environmental Engineer
meesa.otani@dot.gov