

# HISTORIC HAWAII FOUNDATION

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July 1, 2020

Jon Y. Nouchi  
Deputy Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street  
Honolulu, Hawai'i 96813

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

**RE: National Historic Preservation Act, Section 106 Consultation and Review  
Ala Wai Bridge Project Contract No. SC-DTS-1 900086  
Ala Wai Bridge Federal-Aid Project No. TAP-0300 (159)  
Waikiki Ahupua'a, Kona Moku, Island of O'ahu  
TMK : Various**

Dear Mr. Nouchi:

Thank you for referring the above-mentioned project to Historic Hawai'i Foundation (HHF) under Section 106 of the National Preservation Act (NHPA). HHF received the City and County of Honolulu (City) Department of Transportation Services (DTS) letter dated May 29, 2020 opening consultation (received via email on June 3, 2020 and via US mail on June 9, 2020), containing the invitation to consult and additional information on the proposed Area of Potential Effect (APE) with a listing of affected Tax Map Key (TMK) parcels.

DTS has initiated Section 106 consultation on behalf of the Federal Highway Administration (FHWA) in accordance with its delegation of authority (FHWA letter to Hawai'i State Historic Preservation Officer, April 8, 2016). The FHWA will remain responsible for determinations of eligibility and effects on historic properties, as well as resolution of effects.

Previously, HHF participated in the DTS Pre-consultation review of Alternatives (HHF letter dated December 6, 2018); and commented on the November 2019 Final Public Review Draft - Alternatives Analysis Report (HHF letter dated December 3, 2019).

The Section 106 initiation letter requests the following:

- Comment on the proposed APE;
- Comment on the planning process; and
- Comment on the level of effort in HDOT's identification of historic properties.

**Historic Hawai'i Foundation accepts the invitation to participate as a consulting party on the proposed undertaking and provides the following comments on the other questions.**

### 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 a consulting party to FHWA and its state and local partners pursuant to the implementing regulations of the NHPA at 36 Part 800.2(c)(5) as an organization with a demonstrated interest in the undertaking and a concern for the effects on historic properties.

### Description of Undertaking

DTS states that:

“the purpose of the project is to improve access for people travelling by foot or by bicycle across the Ala Wai Canal between Ala Moana Boulevard and the Mānoa/Palolo Stream and to connect the Waikīkī, McCully, and Mō'ili'ili neighborhoods, businesses, parks, schools, and recreational activities.

“The proposed bridge will span the historic Ala Wai Canal, which was added to the Hawai'i Register of Historic Places in 1992. The proposed bridge is in support of numerous regional and area plans that have been developed in the last two decades, particularly fulfilling part of the broader Honolulu Complete Streets Program, which implements projects to improve safety, accessibility, and comfort for all people walking, bicycling, accessing transit, and driving.”

In previous comments, HHF strongly recommended avoidance of the historic McCully and Kalākaua bridges. **HHF is pleased that the new pedestrian bridge will avoid alterations to the existing bridges.**

### Area of Potential Effect

The proposed APE boundaries include the bridge project site; temporary staging, contractor access, and parking areas; the portion of the historic Ala Wai Canal within the view plane of the proposed bridge; adjacent buildings (such as Ala Wai Elementary School); individual properties on both sides of the canal; and University Avenue and Kalaimoku Street public rights-of-way.

**Historic Hawai'i Foundation agrees in concept with the proposed APE for direct effects. In addition, visual impacts to and from the Diamond Head State Monument should be included in the APE. It is unclear if the height of the new structure would impinge on established view planes that protect this natural and historic landmark**

**A more detailed map is needed to delineate the presence of historic properties and features within the area of potential effect, especially canal features such as the steps, walls, walkways, etc.**

### Identification of Historic Properties

The City has contracted with qualified preservation professionals to conduct a review of the historic architectural resources within the APE; to conduct an archaeological literature and field investigation within the APE; and prepare a cultural impact assessment. An evaluation of effect from the proposed project on those properties has not yet been determined.

**Historic Hawai'i Foundation agrees with the approach for the identification of historic and cultural resources within and adjacent to the APE.**

### Planning Process

HHF's involvement with the City's planning process began with the DTS pre-assessment consultation for the HRS Chapter 343 Environmental Assessment in November 2018 to discuss the Ala Wai Canal Bridge

alternatives. The purpose for the pre-consultation was 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 Waikīkī, Ala Moana, and McCully/Mō‘ili‘ili neighborhoods”.

The City published its analysis, titled “Ala Pono,” in November 2019 as the “Final Public Review Draft - Ala Wai Alternatives Analysis.” The report identified “a new crossing in the vicinity of University Avenue as the highest-scoring alternative that best achieves the project’s purpose to improve access for people traveling by foot or bicycle across the Ala Wai Canal.”

Building on the preferred pedestrian bridge crossing alternative, the report went on to describe alternative bridge design types:

“Ala Pono identified a range of bridge types from notable pedestrian and bicycle bridges implemented around the world . . . . This list of potential bridge types was narrowed down to five feasible bridge types based on site constraints and the need for a clear span crossing of the canal without structural support from piers in the water.”

The study concluded that a “Bifurcated Arch Bridge” was the preferred design.

**Historic Hawai‘i Foundation expressed multiple concerns about this design type** including:

“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.” (HHF letter to DTS 12.3.2019)

To date, the Draft Environmental Assessment has not been published. HHF has not received any response to either of its two prior comment letters.

Under the current consultation request, the bridge alternatives have been limited to the single design option that HHF opposed. No explanation of the selection has been provided. DTS states that, “the proposed design of the bridge is a cable-stayed design with an asymmetric configuration that utilizes a main pylon sited on the mauka side of 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.”

This design type is described in the 2019 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 reiterates our earlier comments that:

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**.

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

- Transparent / Low Profile for a more subtle bridge
- Unimpeded views to natural features

- Open feel and sense of connection to the surrounding landscape
- Modern or minimalist bridge character

**HHF is extremely concerned that the planning process has not selected 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.**

The NHPA Section 106 process requires government agencies and project applicants to engage in good faith efforts to avoid unnecessary effects on historic and cultural resources. The Department of Transportation Act Section 4F also requires that transportation facilities utilizing federal funds select alternatives that avoid the use of historic properties when there are prudent and feasible alternatives available.

We look forward to continuing consultation to avoid, minimize and mitigate adverse effects to the historic properties and cultural resources.

Very truly yours,



Kiersten Faulkner  
Executive Director

Copies via email:

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