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**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION AND
THE HAWAI‘I STATE HISTORIC PRESERVATION OFFICER AND
THE HAWAI‘I DEPARTMENT OF TRANSPORTATION AND
THE CITY AND COUNTY OF HONOLULU DEPARTMENT OF TRANSPORTATION SERVICES
AND
WAIKĪKĪ SURF CLUB
REGARDING
THE ALA WAI BRIDGE PROJECT**

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WHEREAS, the Federal Highway Administration (FHWA) will provide assistance to the City and County of Honolulu Department of Transportation Services (CCH DTS) Ala Wai Bridge Project (Project) in the Waikīkī Ahupua‘a, Kona District, O‘ahu Island, pursuant to the Rebuilding American Infrastructure with Sustainability and Equity (RAISE) Transportation Discretionary Grant program as described in 49 U.S.C. 6702, and pursuant to the Transportation Alternatives (TA) Set-Aside from the Surface Transportation Block Grant (STBG) Program as described in 23 U.S.C. 133(h); and

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WHEREAS, FHWA has determined that the Project is an undertaking, as defined in 36 Code of Federal Regulations (CFR) § 800.16(y), and thus is subject to review under Section 106 of the National Historic Preservation Act (NHPA), as amended (54 U.S.C. § 306108), and its implementing regulations (36 CFR § 800); and

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WHEREAS, the Project consists of the design and construction of a pedestrian and bicyclist bridge in the vicinity of University Avenue on the north side of the Ala Wai Canal, across the Ala Wai Canal to connect to the public right-of-way on Ala Wai Boulevard in the vicinity of Kālainmoku Street with at least two landings, a northern landing in the vicinity of University Avenue, and a southern landing in the vicinity of the intersection of Kālainmoku Street and Ala Wai Boulevard; and

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WHEREAS, FHWA, in consultation with the SHPO, has defined the Area of Potential Effects (APE), as defined in 36 CFR §800.16(d), to be the approximately 91 acres that includes the Project footprint, including any areas that might be subject to ground-disturbing activities (e.g., construction areas, temporary staging areas, parking areas, contractor access); the portion of the Ala Wai Canal within the view plane of the proposed bridge; adjacent buildings; individual properties on both sides of the canal; and portions of the public rights-of-way on University Avenue and Kālainmoku Street; and

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WHEREAS, HDOT, as a partner to the Project, and CCH DTS, as the Project sponsor, have participated in consultation and have been invited to sign this Memorandum of Agreement (MOA), along with other invited signatories, as an invited signatory; and

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WHEREAS, FHWA has consulted with the Advisory Council on Historic Preservation (ACHP), State Historic Preservation Officer (SHPO), the State of Hawai‘i Department of Land and Natural Resources, the State Historic Preservation Division (SHPD), State of Hawai‘i Department of Transportation (HDOT), Office of Hawaiian Affairs (OHA), and other Native Hawaiian Organizations (NHOs), and interested parties in accordance with Section 106 of the National Historic Preservation Act (NHPA), as amended, (54 U.S.C. §306108), and its implementing regulations (36 CFR Part 800); and

47 **WHEREAS**, FHWA, through file searches, cultural resources surveys conducted, and
48 consultation with the SHPO, NHOs, and other consulting parties, identified 12 resources as indicated in
49 Attachment A that are either listed in or eligible for listing in the National Register of Historic Places
50 (NRHP) pursuant to 36 CFR §800.4(c); and
51

52 **WHEREAS**, the SHPO concurred with the FHWA’s determination that the Malia qualifies as a
53 Traditional Cultural Property (TCP). The Malia is assigned State Inventory of Historic Places (SIHP) No.
54 50-80-14-09762 and is listed in the National Register of Historic Places (NRHP #93001385) as a
55 structure meeting Criteria A and C.
56

57 **WHEREAS**, FHWA has determined, with SHPO concurring, and notified ACHP that the Project
58 shall have an adverse effect on the Ala Wai Canal, State Inventory of Historic Places (SIHP)
59 #50-80-14-9757, that is listed in the Hawaii Register of Historic Places on July 17, 1992 and is eligible
60 for listing in the NRHP as indicated in Attachment A; and
61

62 **WHEREAS**, in accordance with 36 CFR §800.6(a)(1), FHWA notified the ACHP of its *adverse*
63 *effect* determination on the Ala Wai Canal September 2, 2021, and the ACHP has chosen *not to*
64 participate in the consultation, pursuant to 36 CFR §800.6(a)(1)(iii); and
65

66 **WHEREAS**, FHWA and CCH DTS have consulted with the consulting parties listed in
67 Attachment B regarding the identification of historic properties and effects of the Project, and the
68 consulting parties were provided opportunities to comment at the following Section 106 Consultation
69 meeting held on the following dates:
70

71 October 19, 2020
72 March 1, 2021 (virtual)
73 March 14, 2022 (virtual)
74 November 4, 2022 (virtual)
75 December 15, 2023 (virtual)
76 June 28, 2024 (virtual)
77 July 19, 2024 (hybrid); and
78

79 **WHEREAS**, over the course of the consultation, Waikīkī Surf Club, Historic Hawaii Foundation,
80 the Office of Hawaiian Affairs, along with other consulting parties stated that they believed the project
81 will result in an adverse effect to the Malia, the traditional canoe housed near the Ala Wai Canal (SIHP
82 50-80-14-9762; NRHP #93001385); and
83

84 **WHEREAS**, FHWA found there would be *no adverse effect* to the Malia and the Waikīkī Surf Club
85 requested FHWA pursue a dispute resolution with the ACHP; and
86

87 **WHEREAS**, ACHP in a dispute resolution regarding effects to historic properties opined on the
88 matter and requested additional inquiry into the potential effect to the Malia; and
89

90 **WHEREAS**, ACHP in a dispute resolution regarding effects to historic properties recommended
91 in its response to FHWA on April 12, 2023 the addition of Waikīkī Surf Club as an invited signatory to
92 this MOA due to their role as caretakers of the historic koa canoe *Malia*, and FHWA concurred on July
93 10, 2023; and
94

95 **WHEREAS**, after additional inquiry, FHWA maintained their determination that there would be
96 *no adverse effect* to the *Malia*; and
97

98 **WHEREAS**, the FHWA considered alternatives and refinements throughout the project
99 development process that would avoid, minimize, or mitigate impacts to historic properties while meeting
100 the stated Project Purpose and Need; and

101 **NOW, THEREFORE**, the FHWA, SHPO, HDOT, and CCH DTS agree that the undertaking shall
102 be implemented in accordance with the following stipulations in order to take into account and mitigate the
103 Project adverse effects.

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105 **STIPULATIONS**

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107 FHWA shall ensure that the following stipulations are implemented by HDOT and CCH DTS and will
108 require, as a condition of any approval of federal funding for the undertaking, adherence to the measures
109 set forth herein:
110

111 **I. DOCUMENTATION**

- 112
113 **A.** Prior to the start of any on-site project work, CCH DTS shall hire a Secretary of the Interior
114 (SOI)-qualified professional in history or architectural history (36 CFR Part 61) to prepare an
115 addendum to the existing Ala Wai Canal (Canal) Historic American Engineering Record
116 (HAER) documentation (No. HI-143) by taking new large-format photographic documentation
117 prior to the alteration of the setting of the Canal, and updating the narrative to include more
118 information regarding the significance of the Canal and its character-defining features.
- 119 1. Photos shall focus, at minimum, on the Project area and select view planes that would
120 be most impacted by the bridge (i.e., views towards Diamond Head from the project
121 site, towards the McCully Street Bridge from the project site, towards the Ala Wai
122 Canal from each planned landing area, etc.).
 - 123 2. The work will adhere to the standards set forth in HAER Guidelines for Historical
124 Reports. CCH DTS shall provide draft documentation to the National Park Service
125 (NPS) to verify that it meets the specified standards and formats.
 - 126 3. Upon NPS approval, CCH DTS shall finalize the documentation for submittal to the
127 HAER office. One paper copy and one electronic copy of the final HAER
128 documentation shall be provided to the SHPD. CCH DTS will consult with the
129 Hawai'i State Archives regarding submittal of the HAER documentation to the digital
130 collections of the Archives. Electronic copies will be submitted to the SHPD HICRIS
131 under Project/Agreement No. 2020PR32796. Electronic copies will be provided to
132 consulting parties at their request.
 - 133 4. The addendum to the existing Ala Wai Canal (Canal) Historic American Engineering
134 Record (HAER) documentation (No. HI-143) shall be completed within 3 years of
135 execution of this MOA.
- 136
137 **B.** CCH DTS shall hire a SOI-qualified professional in history or architectural history (36 CFR Part
138 61) to prepare a National Register of Historic Places (NRHP) nomination for the Ala Wai Canal.
139 This nomination would expand upon the documentation completed for the Hawai'i Register of
140 Historic Places to include additional historical research about the development of the canal
141 through the present day, consideration of the significance of the wall repairs and modifications
142 made in the mid-twentieth century which expressed the local, traditional construction methods of
143 Hawai'i's Territorial Period, and a definition of the character-defining features that contribute to
144 the significance of the Canal.
- 145 1. Within 30 calendar days after CCH DTS has contracted with an SOI-qualified
146 professional (as noted above), the chosen contractor, HDOT, CCH DTS, and SHPD
147 shall meet to consult on the scope of the NRHP nomination as well as the appropriate
148 criteria, level of significance, and context included within the nomination form; as
149 well as appropriate resources to use and entities in which to consult. If the consultant
150 requires additional guidance, they are to notify and request a consultation meeting
151 with SHPD and CCH DTS to determine the best path forward.
 - 152 2. The nomination will be completed in accordance with 36 CFR § 60 and follow the
153 guidance of the National Park Service, including but not limited to National Register
154 Bulletin 15 (How to Apply the National Register Criteria for Evaluation), 16A (How
155 to Complete the National Register Registration Form), and 38 (Guidelines for

Evaluating and Documenting Traditional Cultural Places).

3. A 90% Draft of the nomination will be submitted to SHPD for a thirty-day review and comment period. Once CCH DTS, FHWA, and HDOT can provide documentation to SHPD showing that the nomination is complete and that all comments have been accepted or resolved, the mitigation measure will have been fulfilled, regardless of whether it is recommended by the Hawaii Historic Places Review Board, Certified by the SHPO, or listed in the National Register of Historic Places by the Keeper.

II. ARCHAEOLOGICAL MONITORING

- A. CCH DTS will hire a qualified archaeological firm to develop an Archaeological Monitoring Plan (AMP) that shall be approved by the SHPD and implemented pursuant to HAR §13-279, Rules Governing Standards for Archaeological Monitoring Studies and Reports. SIHP #50-80-14-5796, a culturally modified wetland surface present below early twentieth century land reclamation fills in the Project APE, may be encountered during excavations associated with the project, primarily in the area of the south landing. Although not eligible for the NRHP, human skeletal remains and pre-contact and historic-era artifacts are commonly encountered within fill materials throughout Waikīkī. Full time archaeological monitoring would be implemented for all project-related ground disturbance within proximity of SIHP #50-80-14-5796 and on-call archaeological monitoring would be implemented for all project related activities that do not include ground disturbance. Following completion of monitoring efforts, an Archaeological Monitoring Report meeting the requirements of HAR §13-279-5 will be submitted to SHPD for review and concurrence.

III. DURATION

This MOA will expire if its terms are not carried out within five (5) years from the date of its execution. Prior to such time, FHWA shall consult with the other signatories to reconsider the terms of the MOA and amend it in accordance with Stipulation X below.

IV. REPORTING

Each year on June 1, CCH DTS will provide FHWA, SHPO, and the consulting parties with a written summary report detailing the work undertaken throughout the previous year pursuant to the stipulations of this MOA. The annual summary report will include an update regarding all tasks undertaken relevant to stipulations within this MOA, scheduling changes, problems encountered, and any disputes regarding implementation of these stipulated measures. A final report will be submitted to all Consulting Parties.

VII. COORDINATION WITH OTHER FEDERAL REVIEWS

In the event any other federal agency provides funding, permits, licenses, or other assistance to CCH DTS for the Project as planned at the time of the execution of this MOA, the FHWA shall notify in writing and consult with all Signatories and such funding or approving agency may comply with Section 106 by agreeing, in writing, to the terms of this MOA. Any necessary amendments will be coordinated pursuant to Stipulation X.

VIII. POST-REVIEW DISCOVERIES

If CCH DTS and FHWA determine after construction has commenced that Project activities will affect a previously unidentified archaeological or historical resource that may be eligible for the NRHP, or affect a known resource in an unanticipated manner, FHWA will address the discovery or unanticipated effect in accordance with 36 CFR §800.13(b)(3), Hawai'i Revised Statutes (HRS) §6E-43, and Hawai'i Administrative Rules (HAR) §13-300-40(b), as applicable. FHWA, at its discretion, may assume any unanticipated discovered property to be eligible for inclusion in the NRHP, pursuant to 36 CFR §800.13(c). If human remains or archaeological sites are inadvertently discovered, then CCH DTS will

211 implement the process outlined in HAR §13-300-40.
212

213 **IX. DISPUTE RESOLUTION**
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215 **A.** Should any signatory or consulting party object at any time to the manner in which the terms of
216 this MOA are implemented, within 30 days of information being provided relating to the issue forming
217 the basis of the objection, or within 30 days where the objector can otherwise be reasonably assumed to
218 be aware of the issue forming the basis of objection, FHWA shall consult with such party to resolve the
219 objection; all parties shall be notified in writing and invited to participate in the consultation to resolve
220 the objection. If FHWA determines that such objection cannot be resolved, FHWA will take the
221 following steps:

- 222 1. Forward all documentation relevant to the dispute, including FHWA's proposed resolution, to
223 the ACHP. The ACHP shall provide FHWA with its advice on the resolution of the objection
224 within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on
225 the dispute, FHWA shall prepare a written response that takes into account any timely advice or
226 comments regarding the dispute from ACHP, signatories, and consulting parties and provide
227 them with a copy of this written response. FHWA shall then proceed according to its final
228 decision.
- 229 2. If ACHP does not provide its advice regarding the dispute within the thirty (30) day period,
230 FHWA may make a final decision on the dispute and proceed accordingly. Prior to reaching such
231 a final decision, FHWA shall prepare a written response that takes into account any timely
232 comments regarding the dispute from the signatories and consulting parties to the MOA, and
233 provide them to ACHP with a copy of such written response.
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236 **B.** Objections from the Public: Should a member of the public object to an action taken under this
237 MOA, or compliance with the MOA, within thirty (30) days of information being provided relating to the
238 issue forming the basis of the objection, or within thirty (30) days where the objector can otherwise be
239 reasonably assumed to be aware of the issue forming the basis of objection, FHWA will ensure that CCH
240 DTS consults with the objecting party to respond to the objection in coordination with FHWA where
241 relevant, provided the objection is made in writing to the FHWA or CCH DTS contacts identified in
242 Attachment C or any subsequent updates to Attachment C. CCH DTS and FHWA will inform other
243 Signatories of the objection and proposed resolution. Should a Signatory disagree with the proposed
244 resolution, the Signatories will follow Stipulation IX.A.

245 **C.** FHWA's responsibility to carry out all other actions subject to the terms of this MOA that are not
246 the subject of the dispute remain unchanged.
247

248 **X. AMENDMENT**
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250 This MOA may be amended when such amendment is agreed to, in writing, by all required signatories.
251 The amendment will be effective on the date that a copy is signed by the last signatory.

252 **XI. TERMINATION**
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254 This MOA will expire in five (5) years or upon completion of its terms, whichever comes last. If FHWA,
255 SHPO, HDOT, or CCH DTS determines that the terms of this MOA will not or cannot be carried out, that
256 party will immediately consult with the other signatories in writing to attempt to develop an amendment
257 per Stipulation X if within thirty (30) calendar days (or another time period agreed to by all signatories) an
258 amendment cannot be reached, any signatory may terminate the MOA upon written notification to the
259 other signatories
260

261 **XII. EXECUTION OF MOA**
262

- 263 **A.** This MOA will become effective on the date of the final signature by the required
264 signatories. FHWA will ensure each required signatory, invited signatory, and concurring
265 party is provided with a complete copy, and that the final MOA, any updates to
266 attachments, and any amendments are filed with the ACHP.
267
- 268 **B.** Execution of this MOA by FHWA and SHPO and implementation of its terms is evidence
269 that FHWA has taken into account the effects of its undertaking on historic properties and
270 has afforded the ACHP opportunity to comment pursuant to Section 106 of the NHPA.

SIGNATURE PAGE

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THE CITY AND COUNTY OF HONOLULU DEPARTMENT OF TRANSPORTATION SERVICES
AND
WAIKĪKĪ SURF CLUB
REGARDING
THE ALA WAI BRIDGE PROJECT**

REQUIRED SIGNATORY

FEDERAL HIGHWAY ADMINISTRATION


SIGNED BY: **RICHELLE M
TAKARA** Digitally signed by
RICHELLE M TAKARA
Date: 2025.05.13 14:08:14
-10'00' Date: 5/13/2025
Richelle Takara
Division Administrator

SIGNATURE PAGE

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AND
WAIKIKI SURF CLUB
REGARDING
THE ALA WAI BRIDGE PROJECT**

REQUIRED SIGNATORY

HAWAI'I STATE HISTORIC PRESERVATION OFFICER

SIGNED BY:  _____ Date: Jun 25, 2025


Dawn N.S. Chang, Esq.
State Historic Preservation Officer

SIGNATURE PAGE

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AND
WAIKĪKĪ SURF CLUB
REGARDING
THE ALA WAI BRIDGE PROJECT**

INVITED SIGNATORY

CITY AND COUNTY OF HONOLULU, DEPARTMENT OF TRANSPORTATION SERVICES

SIGNED BY:  Date: 4-23-25
J. Roger Morton
Director

SIGNATURE PAGE

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AND
WAIKIKI SURF CLUB
REGARDING
THE ALA WAI BRIDGE PROJECT**

INVITED SIGNATORY

HAWAI'I DEPARTMENT OF TRANSPORTATION

SIGNED BY:  _____ Date: May 1, 2025
Edwin H. Sniffen,
Director of Transportation

SIGNATURE PAGE

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THE CITY AND COUNTY OF HONOLULU DEPARTMENT OF TRANSPORTATION SERVICES
AND
WAIKIKI SURF CLUB
REGARDING
THE ALA WAI BRIDGE PROJECT**

INVITED SIGNATORY

WAIKIKI SURF CLUB

SIGNED BY: _____ Date: _____
Luana Froiseth
President

**Attachment A:
FHWA Effect Determination on Identified Historic Properties in the Ala Wai Bridge Project APE**

Historic Property	NRHP Status	Effect Determination
Ala Wai Canal (SIHP #50-80-14-09757) (Listed in the HRHP)	Eligible	Adverse effect*
McCully Street Bridge	Eligible	No adverse effect
Hawaiian Canoe Malia (NRHP #93001385) (SIHP # 50-80-14-9762)	Listed	No adverse effect*
Ala Wai Clubhouse (SIHP # 50-80-14-01388) (Listed in the HRHP)	Eligible	No adverse effect
South Comfort Station (Ala Wai Neighborhood Park)	Eligible	No adverse effect
Ala Wai Plaza Condominium	Eligible	No adverse effect
Ala Wai Elementary School	Eligible	No adverse effect
Waikiki-Kapahulu Library	Eligible	No adverse effect
2153 Ala Wai Boulevard (Residential Apartment)	Eligible	No adverse effect
445 Kaiolu Street Rosalei Apartments	Eligible	No adverse effect
2107 Ala Wai Boulevard (Single Family Residence)	Eligible	No adverse effect
441-443 Kālaimoku Street (Duplex)	Eligible	No adverse effect

**Under Hawai‘i Administrative Rules (HAR) 13-275 and the Hawai‘i Revised Statutes (HRS) Chapter 6E-8, the Project was determined to have an effect, with proposed mitigation commitments for this historic resource. These are state regulations applicable to HDOT and CCH DTS and are separate from federal regulations applicable to FHWA. Mitigation commitments under 6E-8 have been determined through consultation by HDOT and CCH DTS and are documented in a mitigation plan between CCH DTS and SHPD.*

**Attachment B:
Ala Wai Bridge Project Consulting Parties**

Required Signatories

Richelle Takara
Division Administrator – Hawai‘i
Federal Highway Administration
U.S. Department of Transportation

Jessica Puff
Deputy State Historic Preservation Officer
Administrator, State Historic Preservation
Division

Invited Signatories

J. Roger Morton
Director
Department of Transportation Services
City and County of Honolulu

Edwin Sniffen
Director
Hawai‘i Department of Transportation

Luana Froiseth
President
Waikiki Surf Club

Consulting Parties

Agencies:

Kasey Miller
Program Analyst and FHWA Liaison
Advisory Council on Historic Preservation

Kalani L. Ka’ana’ana
Director of Hawaiian Cultural Affairs
Hawai‘i Tourism Authority

Native Hawaiian Organizations:

Association of Hawaiian Civic Clubs

Kamuela Cobb-Adams
Senior Director, O‘ahu Region, Community
Engagement & Resources Group

O‘ahu Council - Association of Hawaiian Civic
Clubs

Kamehameha Schools
Kamakana Ferreira
Lead Compliance Specialist
Office of Hawaiian Affairs

Monte McComber
Cultural Director
Royal Hawaiian Center - Helumoa Hale Guest
Services and Heritage Room

Waikīkī Hawaiian Civic Club

Paddling Groups:

Hui Lanakila

Kamehameha Canoe Club

Lōkahi Canoe Club

Tyler Roukema
General Manager
Outrigger Canoe Club

Waikīkī Beach Boys Canoe Club

Luana Froiseth
President
Waikīkī Surf Club

Additional Consulting Parties:

Karen French
Supervisor
Ala Wai Community Park (Historic Property:
Ala Wai Park Clubhouse)

Michelle Debusca
Principal
Ala Wai Elementary School

Laura Ruby
Resident Member
Ala Wai Mauka Community Association

Helen Rauer
President
Ala Wai Watershed Association (Historic
Property: Ala Wai Canal)

Mufi Hannemann
President & CEO
Hawai'i Lodging and Tourism Association

Noelani Schilling-Wheeler
Executive Director of O'ahu Visitor's Bureau
Hawai'i Visitors and Conventions Bureau

Kiersten Faulkner
Executive Director
Historic Hawai'i Foundation

Timothy R. Cottrell, Ph.D.
Head of School
Iolani School (Historic Property: St. Alban's
Chapel)

Alethea Rebman
President
Kapiolani Park Preservation Society (Historic
Property: Kapiolani Park)

Elizabeth S. Merritt
Deputy General Counsel
National Trust for Historic Preservation

Arleen Velasco
Vice Chair
Diamond Head – Kapahulu – St. Louis Heights
Neighborhood Board No. 5

Dave Barber
Member
McCully - Mō'ili'ili Neighborhood Board No. 8

Robert Finley
Chair
Waikīkī Neighborhood Board No. 9

Winston Welch
Executive Director
Outdoor Circle

Karin Lynn
Resident

Keona Downing
President
Surfing Education Association

Dolan Eversole
Waikīkī Beach Management Coordinator
Waikīkī Beach Community Advisory
Committee

Richard Egged
President
Waikīkī Improvement Association

**Attachment C:
FHWA and CCH Staff MOA-Project Contact Information**

For FHWA:

Meesa Otani
Environmental Engineer
FHWA - Hawai'i Division
300 Ala Moana Blvd, Rm 3-229
phone (808) 541-2316
meesa.otani@dot.gov

For CCH:

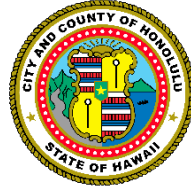
Peter Garino
Project Manager
City and County of Honolulu
Department of Transportation Services
711 Kapiolani Boulevard
Suite 1600
phone (808) 768-6651
peter.garino@honolulu.gov

**Attachment D:
HRS 6E-8 Documents for Ala Wai Bridge:
September 21, 2022 Correspondence from CCH DTS to SHPO,
February 16, 2023 Correspondence from SHPD to CCH DTS**

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

711 KAPIOLANI BOULEVARD, SUITE 1600
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

RICK BLANGIARDI
MAYOR



J. ROGER MORTON
DIRECTOR

JON Y. NOUCHI
DEPUTY DIRECTOR

TP9/22-888419

September 21, 2022

SENT VIA HICRIS

HICRIS Project No.
2020PR32796

Alan S. Downer, Ph.D.
Deputy State Historic Preservation Officer
Administrator, State Historic Preservation Division
alan.s.downer@hawaii.gov

SUBJECT: State Historic Preservation Review - HRS 6E-8 Review
Ala Wai Bridge Project Contract No. SC-DTS-1900086 for the
Ala Wai Bridge Federal-Aid Project No. TAP-0300 (159)
Waikīkī Ahupuaa, Kona Moku, Island of O'ahu
TMKs: [1] 2-6-015:012; 2-6-016:001, 038, 056 through 060;
2-6-017:024, 025, 029, 033, 034; 2-7:013:002, 011; 2-7-036:000,
001, 002, 005 through 007

Dear Dr. Downer:

The City and County of Honolulu's Department of Transportation Services (CCH DTS) and the Hawai'i Department of Transportation (HDOT) submits this letter to provide a project summary for State Historic Preservation Division (SHPD) review per Hawaii Revised Statutes (HRS) Chapter 6E-8 in connection with the Ala Wai Bridge Project (undertaking). This 6E compliance is being completed concurrently with the Section 106 of the National Historic Preservation Act (NHPA) process and in support of a NEPA/HEPA Environmental Assessment (EA)/Finding of No Significant Impact (FONSI).

Consultation with SHPD was conducted via multiple meetings from 2020 to 2022 to encourage cooperation and collaboration between agencies for compliance with both HRS Chapter 6E and NHPA Section 106. Section 106 compliance and consultation are ongoing through a separate, concurrent process being led by the Federal Highway Administration – Hawaii Division (FHWA).

Per HAR §13-275-3, when an agency proposes “a project which may have an effect upon historic properties,” the agency shall notify SHPD and request a letter of determination. DTS offers the following documentation:

Introduction and Project Description

The Ala Wai Bridge is proposed to extend from the south end of University Avenue, within the Ala Wai Community Park, across the Ala Wai Canal, and connect to the intersection of Ala Wai Boulevard and Kālainmoku Street. The area of ground disturbance for the project measures approximately 0.28 acres (12,196.8 square feet [sq. ft.] or 1,133 square meters [sq. m.]) and is comprised of two landings, a northern landing at the end of University Avenue within the Ala Wai Community Park and a southern landing at the intersection of Kālainmoku Street and Ala Wai Boulevard. Please see Attachment C for the 65% design plans for the project. The area of potential effect (APE) for the undertaking measures approximately 91 acres (3,963,960 sq. ft. or 368,264 sq. m.) and includes the bridge project site, a temporary access, staging, and parking area, the portion of the Ala Wai Canal within the view plane, and individual properties, city streets, and sidewalks that are anticipated to have a prominent view of the bridge. The proposed project is considered an undertaking due to being funded in part under the direct and indirect jurisdiction of FHWA and being carried out using Federal financial assistance.

The proposed undertaking would construct the Ala Wai Bridge, a pedestrian and bicycle bridge across the historic Ala Wai Canal (SIHP #50-80-14-9757). Ground disturbance associated with the project would include excavations for walkway supports and landings that are expected to extend to depths ranging from 40 to 50 ft. (12.2 -15.2 m) below the ground surface, drilled shafts for bridge abutments that would extend up to 180 ft (54.9 m), excavations for sidewalks and landscaping that would extend to 1-2 ft (30-60 cm) below surface, and trenching for utilities and lighting that would extend from 1-6 ft. (30-182 cm) below surface.

Identification and Inventory of Historic Properties (HAR §13-275-5)

At the request of the CCH DTS, through its prime contractor HDR, Inc., MASON Architects, Inc. (Mason) and Honua Consulting, LLC (Honua) completed architectural identification and archaeological literature review, field survey, and ethnographic documentation, respectively.

Mason conducted an architectural survey and evaluated the historic properties identified within the Ala Wai Bridge project’s Area of Potential Effects (APE) for the Hawaii Register of Historic Places (HRHP) under HAR §13-275-6, as

well as the National Register of Historic Places (NRHP) under Section 106 of the NHPA. These findings were previously submitted to the State Historic Preservation Division (SHPD) on September 17, 2020 in Mason's *Identification of Historic Properties Report* (SHPD Log No. 2020.00689, 2020.01278) as part of FHWA's Section 106 compliance process.

Mason identified a total of 30 built historic properties within the study area that are 50 years of age or older. 12 were already listed or determined eligible for the State and/or National Register, and 18 were evaluated as not eligible. Identified historic properties included the Ala Wai Canal (SIHP # 50-80-14-9757), Ala Wai Park Clubhouse (SIHP # 50-80-14-1388), the *Malia* Canoe (SIHP # 50-80-14-9762, NRHP #93001385), McCully Street Bridge, features of the Ala Wai Community Park, Ala Wai Elementary School, Waikiki-Kapahulu Library, condominiums, apartments, and residences.

Honua conducted several cultural resources investigations for the undertaking to comply with HRS Chapter 6E-8 and Section 106 which were also submitted to your office through the Section 106 process. These include the results of a pedestrian archaeological survey and review of previous archaeological studies in the project area, a Traditional Cultural Property Eligibility Evaluation for the *Malia* (2020PR32796.002), an Eligibility Assessment for SIHP No. 50-80-14-5796, and an *Archaeological Literature Review and Field Inspection/Supplemental Archaeological Resources Identification Report for the Ala Wai Pedestrian Bridge Project* (2020PR32796.004). Honua also completed a *Draft Cultural Impact Assessment Report for the Ala Wai Pedestrian Bridge Project Waikīkī Ahupua'a, Kona District, O'ahu Island, TMKs: [1] 2-6-016:001, -038, -056, -060; [1] 2-6-017:003, -004, -014, -016, -023, -025, -028, -029, -033, -034; [1] 2-7-013:002, -011; [1] 2-7-036:001, -005, -007* which is enclosed as Attachment D for your review and concurrence.

Honua identified one previously evaluated archaeological historic property (SIHP # -5796) in the APE and also determined there was one Traditional Cultural Property in the project area: the Hawaiian Canoe *Malia* (NRHP #93001385, SIHP # -9762), which is also considered a built historic property.

Background research for the project APE indicates it is located within a former wetland area primarily used for habitation, growing crops, and constructing fishponds in the pre-contact era. It was later used for banana and rice cultivation in the historic era up until the 1920s when land reclamation events began filling lands and dividing Waikīkī into city blocks, and the Ala Wai Canal was constructed. The Ala Wai Community Park and Ala Wai Golf Course were also developed during this time period.

Numerous Land Commission Awards (LCAs) are present within the project APE. One LCA encompasses the area of ground disturbance, LCA 8559B, 'Apana 29 awarded to William C. Lunalilo. The LCA is shown on an 1881 S. E. Bishop map as "Kaihipapu, Lele o PAU" and is depicted as a large circular lo'i with a berm encircling it. Research also indicates that lands comprising LCA's awarded in the vicinity were distributed by King Liholiho (King Kamehameha II) and Ka'ahumanu (wife of Kamehameha I and co-regent during reign of Kamehameha II) in the 1820's and were likely controlled by the ruling class prior to that.

In addition to Honua's archaeological investigation for this undertaking, several previous archaeological studies have been conducted within the APE (Esh and Hammatt 2004 and 2006a, Petrey et al. 2008, Armstrong and Spear 2009, O'Hare et al. 2010, and LaChance et al. 2014). Additionally, the proposed area of ground disturbance underwent an archaeological inventory survey in 2015 and 2016 for the Ala Wai 46kV underground cables relocation project (Martel and Hammatt 2017) and archaeological monitoring during recent geotechnical boring (Thurman 2020-draft). The Martel and Hammatt (2017) study and several others to the south documented SIHP #50-80-14-5796, the original buried Waikiki wetland surface (LeSuer et al. 2000, Yucha et al. 2009, Sroat et al. 2011, Pammer et al. 2014, Morriss and Hammatt 2015, and Martel and Hammatt 2017). The site consists of deposits of agricultural wetland sediments, non-agricultural wetland sediments, peat sediments, pond sediments, and pond berms dating from the pre-contact era to the early 1900s and has been documented in multiple separate locations. The site has generally been encountered below 4 to 6 ft. (1.2-1.8 m.) of modern and historic land reclamation fill materials. The site was previously documented within the project APE, specifically in a trench just to the south of the area of ground disturbance within the Ala Wai Boulevard and Kālainoku Street right-of-way. No human burials or human skeletal remains have been previously documented anywhere within the project area.

This identification of historic properties has been shared with the consulting parties to this project, including Waikiki Surf Club, Kamehameha Schools, Royal Hawaiian Center, and the Historic Hawaii Foundation during multiple consulting party meetings. No consulting parties disagreed with the list of properties identified.

Evaluation of Significance (HAR §13-275-6) and Integrity

Of the 30 built historic resources identified in Mason's *Identification of Historic Properties* report, 12 were evaluated as significant historic properties meeting HAR §13-275-6 criteria, or as properties already listed in the HRHP and/or NRHP. The 12 significant historic properties are:

1. Ala Wai Canal (SIHP # 50-80-14-09757)
2. Ala Wai Clubhouse (SIHP # 50-80-14-01388)
3. Ala Wai Condominium
4. Ala Wai Elementary School
5. Hawaiian Canoe *Malia* (NRHP #93001385, SIHP # 50-80-14-9762)
6. McCully Street Bridge
7. South Comfort Station (Ala Wai Neighborhood Park)
8. Waikiki-Kapahulu Library
9. 2153 Ala Wai Boulevard (Residential Apartment)
10. 445 Kaiolu Street, Rosalei Apartments
11. 2107 Ala Wai Boulevard (Single Family Residence)
12. 441-443 Kālainoku Street (Duplex)

The remaining 18 built architectural properties were evaluated as not meeting HAR §13-275-6 criteria.

As a result of the surveys and extensive consultation with Native Hawaiian practitioners in the area, it is recommended that the Ala Wai Canal be found significant under criterion “a”, “c”, and “e”, and the *Malia* to be found significant under criterion “a”, “c”, and “e”. CCH DTS has conducted numerous meetings with members of the Waikiki Surf Club as part of consultation. These consultations have included meetings, site visits, and interviews. Based on the input of these practitioners, CCH DTS has determined that both the Ala Wai and *Malia* “have an important value to the native Hawaiian people due to associations with cultural practices once carried out, or still carried out, at the property to due associations with traditional beliefs, events or oral accounts – these associations being important to the group’s history and cultural identity” per the guidance of HAR §13-275-6(b)(5).

Effect Determination (HAR §13-275-7)

Mason’s surveys identified anticipated adverse effects to two (2) historic properties that still retain integrity and significance: Ala Wai Canal (SIHP # 50-80-14-9757) and the Hawaiian Canoe *Malia* (SIHP # 50-80-14-9762). Mason’s effect recommendations for the remaining 10 significant historic properties in the study area are “no historic properties affected.” While the proposed bridge may be visible from many of them, it would not detract from their historic integrity.

Based on the extensive surveys, evaluations, and consultation completed for this project, CCH DTS, as the lead agency under HRS §6E-08, has determined the Ala Wai Bridge Project would have an “effect, with proposed mitigation commitments” per HAR §13-275-7(a)(2).

CCH DTS Determination of Effects to Significant Historic Properties from Ala Wai Bridge Project¹ (HAR §13-275-7)			
Historic Property	Significance Criteria²	Effect Determination HRS 6E-08	Notes
Ala Wai Canal (SIHP #50-80-14-9757)	“a” “c” “e”	Effect, with proposed mitigation commitments	<p>The tall, visually striking cable-stayed bridge is visible from a great distance and introduces a visual element that diminishes the integrity of setting and environment of the property. Its design is not compatible with the massing, size, scale, and architectural features of the canal. The expansive, 1.2-mile segment of the canal from Waikiki-Kapahulu Library to the McCully Bridge would be interrupted by the bridge, changing its character.</p> <p>A visual barrier (bridge landing and attached ramp) would be introduced along Ala Wai Boulevard at Kālainoku Street that would block views of the canal from the Waikīkī side for several hundred feet.</p> <p>Associated paddling activities in the canal would also be impacted by construction activities due to noise, dust, vehicular impacts, and staging. Other impacts include relocation of one of the four docks utilized by paddlers and relocation of the showers and hose bib for washing down equipment, which is necessary for their maintenance.</p> <p>Integrity of setting and feeling would be diminished, and integrity of association would be minimally impaired by the new bridge over the canal.</p>
Hawaiian Canoe <i>Malia</i> (SIHP # 50-80-14-9762)	“a” “c” “e”	Effect, with proposed mitigation commitments	<p>Multiple practitioners spoke to the importance of the existing setting and feeling of the Malia. The undertaking would introduce new auditory and atmospheric elements to the canoe’s site. Practitioners believe that the new elements from the project would change the Malia’s setting and feeling and would impinge upon their traditional cultural practices and use of the Malia (paddling, building and caring for canoes, ceremonial activities, and blessing of canoes). The proposed bridge would affect the integrity of setting and feeling of the Malia under criterion “e”.</p>

¹ FHWA Determination of Effect under NHPA Section 106 will be submitted separately via HICRIS.

² Significance evaluations based on *Identification of Historic Properties, Ala Wai Bridge Project, Honolulu District, Oahu Island, Hawaii* (Mason 2020), SHPD Log. No. 2020.00689, 2020.01278.

McCully Street Bridge	"a" "c"	No historic properties affected	Views of the new bridge in the distance will not detract from the integrity of this property.
Ala Wai Clubhouse (SIHP # 50-80-14-1388)	"a"	No historic properties affected	Southeasterly views from portions of this property toward Diamond Head would include the new bridge, but the bridge would not detract from its integrity.
South Comfort Station (Ala Wai Neighborhood Park)	"c"	No historic properties affected	Views of the new bridge nearby would not detract from the integrity of this property. Modifications to the park/parking lot would not impair integrity since this setting has changed significantly since the comfort station was built.
Ala Wai Plaza Condominium	"c"	No historic properties affected	Views of the new bridge nearby would not detract from the integrity of this property.
Ala Wai Elementary School	"a"	No historic properties affected	Views of the new bridge nearby would not detract from the integrity of this property.
Waikiki-Kapahulu Library	"c"	No historic properties affected	While the new bridge would be visible at a distance from the library, it would not detract from the historic integrity of the library.
2153 Ala Wai Blvd. Residential Apartment	"a" "c"	No historic properties affected	While the new bridge may be visible from portions of this property, it would not detract from the historic integrity of the apartments.
Rosalei Apartments	"a" "c"	No historic properties affected	While the new bridge may be visible from portions of this property, it would not detract from the historic integrity of the apartments.
2107 Ala Wai Blvd. Single Family Residence	"a" "c"	No historic properties affected	While the new bridge may be visible from portions of this property, it would not detract from the historic integrity of the residence.
441-443 Kalaimoku St Duplex	"a"	No historic properties affected	While the new bridge may be visible from portions of this property, it would not detract from the historic integrity of the duplex.

Based on the extensive surveys, evaluations, and consultation completed for this project, CCH DTS, as the lead agency under HRS §6E-08, has determined the Ala Wai Bridge Project would have an "effect, with proposed mitigation commitments" per HAR §13-275-7(a)(2).

(Proposed) Mitigation (HAR §13-275-8)

Under HAR §13-275-8, if a project will have an effect on significant historic properties, then a mitigation commitment proposing the form of mitigation to be undertaken for each significant historic property shall be submitted by the agency to SHPD for review and approval. The HAR identifies five forms of mitigation

which can occur: preservation, architectural recordation, archaeological data recovery, historical data recovery, or ethnographic documentation.

Through the consultation process, CCH DTS and HDOT have consulted with interested persons, NHOs, and other stakeholders regarding the effect of the undertaking on historic properties. The Waikiki Surf Club and other stakeholders expressed concerns that the proposed bridge would affect existing access to and use of the canal, that increased pedestrian traffic from the bridge could lead to vandalism or theft, and that the setting and feeling of the canal and *Malia* would be affected by the proximity to the new bridge. As a result of that consultation, CCH DTS incorporated design refinements that include reducing the height of the bridge towers by 10 feet and updating landscaping plans to better buffer the bridge from the Waikiki Surf Club, and therefore the *Malia*. The revised plans include 95 parking stalls, which is consistent with the existing amount, and also includes 5 accessible parking stalls. The project plans maintain the current access to the Waikiki Surf Club and park facilities surrounding the proposed bridge and also move the Ala Wai Park Trail to the rear of the University Halau, where the *Malia* is stored. This would put pedestrian and bicycle movement to the rear (northeast) of the halau, which means the waterfront access area in front of the halau and *Malia* would be more private with circulation more limited, while also providing more space for practice, cleaning, loading, and unloading canoes. Throughout consultation and interviews, several discussions were held that included potential mitigation measures. CCH DTS is proposing the following mitigation measures:

CCH DTS Proposed Mitigation		
Mitigation	Ala Wai Canal SIHP # 50-80-14-9757	Hawaiian Canoe <i>Malia</i> SIHP # 50-80-14-9762
Preservation, which may include avoidance and protection (conservation), stabilization, rehabilitation, restoration, reconstruction, interpretation, or appropriate cultural use. (HAR §13-275-8(a)(1)(A))	The preservation of the canal is being implemented through avoiding the physical features of the canal.	The <i>Malia</i> is being preserved through the avoidance of any alteration and through the enhancement of protection measures for the halau. To minimize impacts to the <i>Malia</i> and the practice of paddling, and to ensure that the club members can get the canoes to the water safely, CCH DTS is proposing that the boat launch relocation would be regraded and landscaped to ensure the launch conditions are consistent with the existing boat launches. As requested by the Waikiki Surf Club, CCH DTS is proposing to move the showers and hose bib to

CCH DTS Proposed Mitigation		
Mitigation	Ala Wai Canal SIHP # 50-80-14-9757	Hawaiian Canoe <i>Malia</i> SIHP # 50-80-14-9762
		<p>better accommodate the cleaning of the canoes.</p> <p>CCH DTS is also proposing to work with the Waikiki Surf Club to create saddles for the canoes that must be stored outside. This is a security measure to protect the canoes that cannot be stored outside the halau due to historical significance such as the <i>Malia</i>.</p>
<p>Architectural recordation, which involves the photographic documentation and possibly the measured drawing of a building, structure or object prior to its alteration of destruction. (HAR §13-275-8(a)(1)(B))</p>	<p>For the Ala Wai Canal, CCH DTS recommends architectural recordation, which would involve large format photographic documentation of the structure prior to the alternation to the setting. These photos should focus on the project area and select view planes that would be most impacted by the bridge (i.e., views towards Diamond Head from the site, and from the McCully Bridge, towards the Ala Wai along Kālainmoku Street, etc.). This documentation should be prepared as an addendum to the existing Ala Wai Canal recordation, HAER No. HI-143.</p> <p>CCH DTS also recommends updating of the existing Ala Wai Canal HRHP nomination to include consideration of criterion “c” and “e”. This would include additional historical research about the development of the canal through the present day, and consider significance of the wall repairs and modifications made in the mid-twentieth century, which expressed the local, traditional construction methods of Hawai‘i’s Territorial Period. An evaluation of the canal as a traditional cultural property would also be included.</p>	<p>For the <i>Malia</i>, CCH DTS recommends architectural recordation, which would involve updating the NRHP nomination with expanded information regarding its significance and integrity and new photographic documentation. This would include an evaluation of the canoe as a traditional cultural property. CCH DTS also recommends updating the existing HRHP nomination to include consideration of criterion “e” to reflect the traditional cultural significance of the canoe.</p>
<p>Archaeological data recovery, which enables the recovery of an adequate and reasonable amount of significant information from a significant historic</p>	<p>Not appropriate as mitigation for this historic property</p>	<p>Not appropriate as mitigation for this historic property</p>

CCH DTS Proposed Mitigation		
Mitigation	Ala Wai Canal SIHP # 50-80-14-9757	Hawaiian Canoe <i>Malia</i> SIHP # 50-80-14-9762
property prior to its alternation of destruction. Data recovery may include archaeological mapping, surface collection, excavation, monitoring, laboratory analyses, and interpretive analyses. (HAR §13-275-8(a)(1)(C))		
Historical data recovery, which involves researching historical source materials to document an adequate and reasonable amount of information about the property when a property will be altered or destroyed. (HAR §13-275-8(a)(1)(D))	Adequate historical data is recorded, although additional historical data may be needed to update the HRHP listing to include criterion “c” and “e”.	Adequate historical data is generally recorded, although additional historical data may be needed to update the HRHP listing to include criterion “e”. CCH DTS recommends developing content for and installation of a series of educational and interpretive panels regarding the <i>Malia</i> and/or the cultural practice of paddling. These interpretive panels would be installed at select viewing points in or near the project area, potentially along the pedestrian and bicycle path. Content would include historical information and educational content about the history of the <i>Malia</i> , its builder, the Waikiki Surf Club, the importance and practice of canoe paddling in Hawaii, wayfinding and navigation, types of Hawaiian canoe, construction methods, history of canoe racing, or other similar topics to be determined in consultation with stakeholders.
Ethnographic documentation, which involves interviewing knowledgeable individuals and researching historical source materials to document an adequate and reasonable amount of information about the property when a property will be altered or destroyed. (HAR §13-275-8(a)(1)(E))	Adequate ethnographic data is recorded, although additional ethnographic data may be needed to update the HRHP listing to include criterion “e”.	Adequate ethnographic data is recorded, although additional ethnographic data may be needed to update the HRHP listing to include criterion “e” and for development of the interpretive panels.

Archaeological Monitoring for Identification Purposes

Under HAR §13-279-3, “Archaeological monitoring may be an identification, mitigation, or post-mitigation contingency measure. Monitoring shall entail the

archaeological observation of, and possible intervention with, on-going activities, which may adversely affect historic properties”.

It is likely that SIHP #50-80-14-5796, a culturally modified wetland surface present below early twentieth century land reclamation fills, would be encountered during excavations associated with the project, primarily in the area of the south landing. Although not eligible for the HRHP or NRHP, human skeletal remains and pre-contact and historic-era artifacts are commonly encountered within fill materials throughout Waikīkī. Therefore, in order to mitigate potential adverse impacts to significant subsurface wetland deposits, the Ala Wai Canal, or other potential historic property present, it is recommended that the proposed project proceed under an archaeological monitoring program conducted in accordance with HAR §13-279, Rules Governing Standards for Archaeological Monitoring Studies and Reports. On-site archaeological monitoring would be implemented for all project-related ground disturbance within proximity of SIHP #5796, and on-call archaeological monitoring would be implemented for all project related activities that do not include ground disturbance.

Conclusion

Based on the preceding information, supporting documentation already submitted to your office, and the Cultural Impact Assessment (CIA) herein, CCH DTS is seeking a SHPD letter of determination of “effect, with proposed mitigation commitments,” as defined in HAR §13-275-7, as the project would affect one or more significant historic properties, namely the Ala Wai Canal, SIHP # 50-80-14-9757, and the Hawaiian Canoe *Malia*, SIHP # 50-80-14-9762. No other historic properties within or adjacent to the project area would be affected.

Based on the provided surveys, evaluations, and consultation with NHOs, cultural practitioners, organizations, and other stakeholders, CCH DTS recommends identifying both the Ala Wai and *Malia* as significant under criterion “a”, “c”, and “e.” CCH DTS requests your review of the attached CIA prepared by Honua for the project. Per HAR §13-275-6(c), the Office of Hawaiian Affairs was invited to participate in the Section 106 process and will be copied in this determination request as required under the HAR for criterion “e” properties.

CCH DTS has provided proposed mitigation commitments herein per HAR §13-275-8. CCH DTS seeks SHPD review and approval of these mitigation commitments, including a proposed archaeological monitoring plan for identification purposes for ground disturbing activities within proximity of SIHP #50-80-14-5796, a culturally modified wetland surface.

Alan S. Downer, Ph.D.
September 21, 2022
Page 12

We kindly request a response from your organization within 45 days of receipt of this correspondence.

We thank you for your time and attention. Should you have any questions, please contact Meredith Soniat, DTS project manager, at meredith.soniat@honolulu.gov or (808) 768-6682.

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J. Roger Morton
Director

Attachments:

Attachment A: TMK List

Attachment B: Project Area Map

Attachment C: 65% Design Plans

Attachment D: Draft Cultural Impact Assessment Report for the Ala Wai Pedestrian Bridge Project WaikTkT Ahupua'a, Kona District, O'ahu Island, TMKs: [1] 2-6-016:001, -038, -056, -060; [1] 2-6-017:003, -004, -014, -016, -023, -025, -028, -029, -033, -034; [1] 2-7-013:002, -011; [1] 2-7-036:001, -005, -007

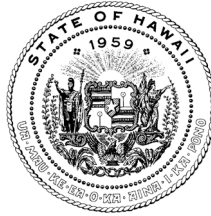
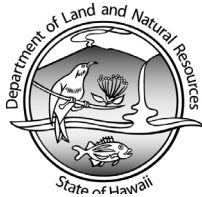
Attachment E: Submittal Filing Fee Form

Attachment F: Identification of Historic Properties

cc Susan A. Lebo, SHPD
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Stephanie Hacker, SHPD
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Peter Garino, DTS
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STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAI'I
DEPARTMENT OF LAND AND NATURAL RESOURCES

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CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

February 16, 2023

Director J. Roger Morton
Department of Transportation Services
City and County of Honolulu
711 Kapiolani Boulevard, Suite 1600
Honolulu, Hawai'i 96813
Email Reply to: Meredith.Soniat@Honolulu.gov
Electronic Transmittal Only, No Hard Copy to Follow

IN REPLY REFER TO:
Project No.: 2020PR32796
Doc. No.: 2301SH04
Archaeology
Architecture

Dear Director Morton:

**SUBJECT: Hawai'i Revised Statutes Chapter 6E-8 Historic Preservation Review –
Continued Consultation and Request for Concurrence with the Effect Determination
Ala Pono Ala Wai Pedestrian and Bicycle Bridge
Ala Wai Bridge Contract No.: SC-DTS-1900086, Federal Aid Project No. TAP-0300(159)
Waikiki Ahupua'a, Kona District, Island of O'ahu
TMK: (1) 2-6-016:001, (1) 2-6-016:038, (1) 2-6-016:056 through 060, (1) 2-6-017:003,
(1) 2-6-017:004, (1) 2-6-017:014 through 016, (1) 2-6-017:023, (1) 2-6-017:025, (1) 2-6-
017:028, (1) 2-6-017:029, (1) 2-6-017:033, (1) 2-6-017:034, (1) 2-7-013:002, (1) 2-7-013:011,
(1) 2-7-036:001, (1) 2-7-036:005, (1) 2-7-036:006, and (1) 2-7-036:007**

The State Historic Preservation Division (SHPD) received a letter dated September 21, 2022 from the City and County of Honolulu, Department of Transportation Services (DTS) to continue consultation under the Chapter 6E historic preservation process and to request the SHPD's concurrence with the effect determination for the Ala Pono Ala Wai Pedestrian and Bicycle Bridge project on the island of O'ahu. The SHPD received this submittal on September 22, 2022 (HICRIS Submission No. 2020PR32796.006).

On November 4, 2022 the DTS and the Federal Highway Administration (FHWA) held a meeting with consulting parties, including the SHPD. During the meeting consulting parties were asked to provide any additional comments by November 14, 2022. SHPD notified DTS that a SHPD response to the effect determination letter would follow SHPD's written receipt of all comments received from consulting parties. On December 7, 2022 the SHPD received the meeting notes and presentation from the November 4, 2022 meeting (HICRIS Submission No. 2020PR32796.009).

The proposed DTS project, in coordination the Hawai'i Department of Transportation (HDOT), will receive funding from the FHWA and has been determined a federal undertaking as defined in 36 CFR 800.16(y). The proposed project is subject to compliance with Section 106 of the NHPA and historic preservation review under Hawai'i Revised Statutes (HRS) §6E-8. The State Historic Preservation Officer (SHPO) concurred with a Section 106 effect determination of *adverse effect* for the proposed project in a letter dated January 4, 2023 (SHPD Doc. No. 2212SH14).

The DTS intends to construct the Ala Wai Bridge to provide safe access for people travelling by foot or by bicycle across the Ala Wai Canal in the area between Ala Moana Boulevard and the Manoa/Palolo Stream. The bridge will extend from the south end of University Avenue, within the Ala Wai Neighborhood Park, across the Ala Wai Canal, and connect to the intersection of Ala Wai Boulevard and Kālaïmoku Street. 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. Lighting will be incorporated on the bridge deck, cables, and bridge features itself. The tower will include facets designed to create shadows and reflect light based on the time of year and atmospheric condition. The proposed bridge will be approximately 20 feet wide to accommodate pedestrians and cyclists.

Makai of the canal, the project will involve improvements on the Ala Wai Promenade to accommodate the makai ramp, which will be designed to meet ADA requirements. On the mauka end of the bridge, a 180-foot-high tower will straddle a cast-in-place deck that will cantilever over the water. The mauka ramp will require minimal excavation. The mauka ramp will involve tie-ins to the existing Ala Wai Neighborhood Park and the existing pedestrian and bicycle path along the canal. Pedestrian and bicycle improvements will also be constructed between the mauka end of the bridge and University Avenue through the existing Ala Wai Neighborhood Park parking lot.

The area of ground disturbance for the project measures approximately 0.28 acres and is associated with two landings, a northern landing at the end of University Avenue within the Ala Wai Community Park and a southern landing at the intersection of Kālaïmoku Street and Ala Wai Boulevard. Ground disturbance associated with the project also includes excavations for walkway supports and landings that are expected to extend to depths ranging from 40 to 50 ft. (12.2 - 15.2 m) below the ground surface, drilled shafts for bridge abutments that would extend up to 180 ft (54.9 m), excavations for sidewalks and landscaping that would extend to 1-2 ft (30-60 cm) below surface, and trenching for utilities and lighting that would extend from 1-6 ft. (30-182 cm) below surface.

The project area measures approximately 91 acres and includes the bridge project site, a temporary access, staging, and parking area, the portion of the Ala Wai Canal within the view plane, and individual properties, city streets, and sidewalks that are anticipated to have a prominent view of the bridge. The public rights-of-way at University Avenue and Kālaïmoku Street are included within the Section 106 Area of Potential Effects (APE), and presumably the Chapter 6E project area since they would have prominent views of the bridge infrastructure.

The following proposed design changes are listed in the recent September letter from FHWA:

Bridge Span:

- Top of deck elevation has been adjusted to maintain a 70'-0" wide clear zone extending 12.5' above mean sea level (MSL).
- Bridge railing design was refined.

Bridge Tower:

- Tower height was reduced by 10'-0".
- Forestay and backstay cable anchorages along tower spine were refined.

Mauka Landing:

- Stairs and seating were removed from the mauka landing.
- Ala Wai Park Trail/bicycle path was relocated to rear of canoe halau o Parking nearest to canoe halau will shift mauka.
- Parking was relocated from Keiki Play area green to mauka area adjacent the existing Basketball Court.
- Gazebo, swings, and existing Keiki Play structure are planned to remain.
- Roundabout is proposed at bridge landing intersection with bicycle/pedestrian path to improve circulation
- Parking at Ala Wai Neighborhood Park to remain at 95 stalls instead of increasing the number of stalls per request from the Department of Parks and Recreation.
- Updated landscaping and site plans to increase buffer around Waikiki Surf Club, and therefore the Malia.

Historic Properties, as defined in HAR §13-275-2, identified in the project area include the Ala Wai Canal (State Inventory of Historic Places [SIHP] No. 50-80-14-9757), the *Malia* Canoe (SIHP No. 50-80-14-9762), and an archaeological site described as a culturally modified wetland surface present below early twentieth century land reclamation fills (SIHP No. 50-80-14-5796).

The DTS determined that the Ala Wai Canal and the Malia are significant per HAR §13-275-6 under criteria a, c, and e. **The SHPD concurs.**

To mitigate impacts to the Ala Wai Canal the DTS proposes to complete (1) preservation of the canal through avoidance measures, (2) architectural recordation, and (3) updating the existing Ala Wai Canal Hawaii Register of Historic Places (HRHP) nomination to include consideration of Criteria c and e.

To mitigate impacts to the Malia Canoe the DTS proposes to complete (1) preservation of the canoe through avoidance measures, (2) to minimize impacts the boat launch relocation would be regraded and landscaped to ensure the launch conditions are consistent with the existing boat launches and security measures are proposed, (3) architectural recordation including updating the National Register of Historic Places nomination which would assess the canoe as a Traditional Cultural Property, (4) updating the HRHP nomination to include consideration of the traditional cultural significance of the canoe, and (5) developing content for and installation of a series of educational and interpretive panels regarding the Malia and/or the cultural practice of paddling.

Additional details related to the above proposed mitigation are provided in DTS's letter.

The DTS states SIHP No. 50-80-14-5796 is not significant per HAR §13-275-6. DTS has determined the site is likely to be encountered during the proposed project and has proposed archaeological monitoring is conducted for identification purposes during the project. DTS proposes on-site archaeological monitoring would be implemented for all project-related ground disturbance within the proximity of SIHP No. 50-80-14-5796, and on-call archaeological monitoring would be implemented for all project related activities that do not include ground disturbance. The SHPD agrees with the proposed identification efforts. The results of the archaeological monitoring may result in an assessment of significance and integrity for SIHP No. 50-80-14-5796.

Per HAR §13-275-7(a)(2), the DTS has determined the proposed project will result in "Effect, with proposed mitigation commitments". **The SHPO concurs** with the determination and the proposed mitigation as described in DTS's letter.

Prior to project initiation, please submit to SHPD the following:

1. A timeline for completing the proposed mitigation for which DTS and SHPD can agree, and
2. An archaeological monitoring plan meeting the requirements of HAR §13-279-4 for review and acceptance.

Please submit all forthcoming information and correspondence related to the subject project to SHPD via HICRIS to Project No. 2020PR32796 using the Project Supplement option.

The SHPD looks forward to continuing the Section 106 process for the proposed project.

The FHWA, DTS, and HDOT are the offices of record for this undertaking. Please maintain a copy of this letter with your environmental review record for this undertaking.

Please contact Jessica Puff, Architecture Branch Chief, at Jessica.Puff@hawaii.gov for matters regarding architectural resources. Please contact Stephanie Hacker, Historic Preservation Archaeologist IV, at Stephanie.Hacker@hawaii.gov or at (808) 692-8046 for matters regarding archaeological resources or this letter.

Aloha,

Susan A. Lebo

Signed For

Alan S. Downer, PhD

Administrator, State Historic Preservation Division

Deputy State Historic Preservation Officer

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