

APPENDIX F

Consultation During the Preparation of the Final Preservation Plan

Evhl

JOHN BLUMER-BUELL
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July 9, 2001

County of Maui Public Works and Waste Management
David Goode, Director
200 S. High Street
Wailuku, Maui 96793
Attention: Lloyd Lee, P.E., Chief, Division of Engineering
Fax # 270-7975

RECEIVED
JUL 12 2001

WILSON OKAMOTO & ASSOC., INC.

Wilson Okamoto & Associates, Inc.
1907 S. Beretania Street Suite 400
Honolulu, Hawaii 96826
Fax # 808-946-2253

Sent Via U.S. Postal Service Certified Mail and FAX

RE: Additional Comments, Revised Draft of "Preservation Plan for County of Maui Bridges Within the Hana Highway Historic District".

Aloha,

I sincerely thank you for helping to make significant progress on some of the important issues we are trying to address in this process. I have several comments and requests regarding the revised draft:

1) I would like to restate the request I made in my September 19, 2000, letter regarding the draft plan. I request that the State of Hawaii and the County of Maui prepare a collaborative Environment Impact Statement for all the bridges in the Hana Highway Historic District. As clarified by the eighteen questions in my letter, the EIS would include the roads and bridges and their impact upon the Hana District.

I continue to conclude that the long term, comprehensive, "big picture" has not been addressed in this process.

2) Safety and Preservation Concerns. I continue to be perplexed and concerned by the County's "policy" regarding safety and preservation. In Mr. Goode's January 12, 2001, letter to me he states "In allocating scarce resources, critical public safety concerns have the highest priority". The revised draft has a section on public safety and tort liability. There is a newspaper article titled "State faces \$3.3 million judgment in accident" included several times in the revised draft. Mr. Lloyd Lee of the County Public Works Department has stated that some bridges may have to be closed because they are unsafe. Safety and liability concerns have been brought up for discussion repeatedly.

Even though there has been a great deal of concern expressed regarding public safety, the County of Maui continues to allow over the posted weight limit vehicles to use the bridges. Without question, the lack of any enforcement of weight limits in conjunction with little to no maintenance has led to further deterioration of some, if not all, the bridges. I first brought this to the attention of the County of Maui in written and public testimony regarding Papa'ahawahawa bridge around five years ago.

It appears that the County of Maui has an unwritten policy to allow the bridges to be degraded. The results of the policy are higher long term costs, increased safety risks and increased exposure for liability.

Even if some bridges are replaced, the unwritten policy of continued degradation will make repairs to remaining bridges less viable and more expensive and will continue to escalate the safety and liability issues. The revised draft is supposed to be a preservation plan.

3) Page 28, 6. COMMUNITY AND AGENCY CONSULTATION, #7.

I participated in the February 12, 2001, site visit with a representative of the Fyfe Company, LLC, a representative of the Maui Cultural Resources Commission and National Park Service. Unfortunately, there was not a representative of the Maui County Public Works Department present.

It should be noted that the representative of Fyfe Company felt that both Kaholopo and Papa'ahawahawa bridges could be repaired if there was the willingness to do so. It should also be noted that the recent storm damage to Kaholopo Bridge and the road was caused by a lack of maintenance of the stream channel. As of this date, the stream channel is still clogged with rocks that cause the stream to be diverted.

I request that the information provided by the Fyfe Company, LLC, be included in the Appendices. The information is titled TYFO SYSTEMS.

I also request that information on Acrow Panel Bridges be included in the Appendices. These portable bridge systems could very well be a key element in the formulation of repair/maintenance/replacement plans.

4) It is my understanding that the Hana Highway has recently been placed on the Register for National Historic Places. Are there rules and/or laws that are now applicable to the preservation plan?

5) Page 8, Table 2. 1990 Ratings of County Bridges, Under Environmental.

History is given a 0 rating throughout. Testimony in earlier hearings stated there was important history.

I look forward to working with you to find appropriate solutions to the problems.

Sincerely yours,



JAMES "KIMO" APANA
Mayor
DAVID C. GOODE
Director

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COUNTY OF MAUI
DEPARTMENT OF PUBLIC WORKS
AND WASTE MANAGEMENT
ENGINEERING DIVISION
200 SOUTH HIGH STREET
WAILUKU, MAUI, HAWAII 96793

September 20, 2001

Mr. John Blumer-Buell
SR 11
Hana, Hawaii 96713

SUBJECT: REVISED DRAFT PRESERVATION PLAN FOR COUNTY OF MAUI BRIDGES
WITHIN THE HANA HIGHWAY HISTORIC DISTRICT

Dear Mr. Blumer-Buell:

Thank you for your letter dated July 29, 2001, commenting on the subject Preservation Plan. We appreciate your recognition of the progress made to date and offer the following in response to your specific comments:

1. In our letter to you dated January 12, 2001, we concurred that an ideal Preservation Plan and EIS would encompass the entire stretch of highway, including all of the County, State and Federal bridges in the Hana Highway Historic District. Nevertheless, preparation of such a document would be neither practical, nor mandatory. Given the increasing threat to public safety of keeping deteriorating bridges in service, committing to any lengthy process before the deficiencies could be addressed would force the County, or the State if the County does not act, to close them to traffic.
2. The County is very concerned about public safety and liability risks associated with the continued use of its deficient bridges. It is deferring their closure to traffic, however, because the bridges are vital to the transportation needs of the community and because it anticipates that their deficiencies can soon be addressed through the current process. The County enforces the weight limits on its bridges and the Police Department will cite violators. At the same time, the County recognizes that vital services to the community cannot be provided unless County vehicles exceeding weight limits are allowed across the bridges. Indeed, safe accommodation of such County vehicles is a critical need for addressing bridge deficiencies.

Your allegation that the County is pursuing a policy of allowing overweight vehicles to use the bridges in order to degrade them is unfounded. The resources needed to continuously enforce weight limits over the many

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1 SEP. 27 2001

WILSON OKAMOTO & ASSOC., INC.

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decades of incremental degradation caused by relatively few overweight vehicles in the traffic stream would have been unjustifiable. Terminating vital services dependent on the use of the deficient bridges by overweight County vehicles is also infeasible.

As we stated in our letter of January 12, 2001, the deterioration of the bridges is a result of extremely limited maintenance resources. The maintenance budget has remained unchanged for years, despite rising maintenance costs, construction of many miles of additional roads, and dedication to the County of many additional miles of roads in new subdivisions. In allocating scarce resources, critical public safety concerns have the highest priority. Preventive maintenance, though important and possibly cost-effective over the long term, takes a lower priority. The deterioration of the County's bridges in Hana is reflective of this prioritization. Because they are so substandard, eventual replacement with standard designs when they become a public safety concern is the solution dictated by the chronic scarcity of maintenance resources. This solution is even more attractive since the Federal government offers generous grants-in-aid for such replacements, with its award priority targeting the most substandard and deteriorated bridges, but has no funding program for routine maintenance.

3. Mr. Pete Milligan, who represented Fyfe Company at the February site visit, indicated that neither Papahawahawa nor Kaholopo Bridges would be appropriate candidates for rehabilitation using composite materials. The issue is not whether the bridges can be repaired or rehabilitated but what standards should be achieved, how best to achieve those standards, including through the alternative of replacement, and what funding options may be available. These issues are comprehensively addressed in the Preservation Plan.

It would not be appropriate to include brochures or information on proprietary methods/products in the Preservation Plan as the County should not give the appearance of endorsing or favoring a particular method/product.

4. Although "listing" in the State and National Register of Historic Places elevates recognition of the historic value of the Hana Highway Historic District, the applicability of laws and rules are the same as for when its status was "nominated." The rationale of the State and Federal laws, in this regard, is to apply their respective requirements to nominated sites to assure that they are not adversely affected before they can be processed for listing.

Mr. John Blumer-Buell

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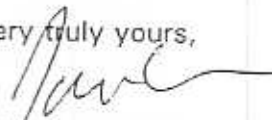
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5. As explained in the Preservation Plan, the ratings for the bridges were made independently through the respective historic bridge inventories. The Preservation Plan reported and discussed the ratings as a consideration in preparing the plan. Inasmuch as the Preservation Plan addresses only the 14 County bridges, there is not basis for re-evaluating the ratings, which were done on a statewide basis. Any comments regarding the ratings given for the bridges should be directed to the State Department of Transportation, which prepared the inventories.

Your interest and participation in the development of this Preservation Plan are appreciated.

Very truly yours,



DAVID GOODE
Director of Public Works
and Waste Management

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xc: Lloyd Lee, County of Maui, DPWWM
Earl Matsukawa, WOA

AHEM

Alliance for the Heritage of East Maui
P.O. Box 488
Hāna, Maui, Hawai'i 96713

RECEIVED
AUG 20 2001

David Goode, Director
Department of Public Works
200 High Street
Wailuku, HI 96793

WILSON OKAMOTO & ASSOC., INC.

August 13, 2001

Dear Mr. Goode,

RE: Preservation Plan for the County of Maui Bridges within the Hāna Highway
Historic District

Mahalo for the opportunity to review this vastly improved revised draft preservation
plan. It far better lives up to its name, now!

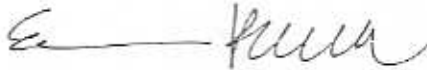
We'd like to offer the following comments:

- **Repair vs. demolition:** Obviously repairing an original bridge maintains its integrity in a way replacement cannot – no matter how accurately reproduced. We'd like to commend the DPWWM on its commitment to maintaining historic integrity and encourage the county to continue to make every effort to save Hāna District's old bridges. Accordingly, we strongly support Alternative B for 'Alaalaula and Hāhālawe Stream Bridges and Alternative C for Koukou'ai Stream Bridge. We'd also like to commend the county for its proposal to explore the feasibility of using "fiber-wrap" technology to restore 'Alaalaula, Mahalawa, and Koukou'ai Stream Bridges.
- **Historic Road Integrity:** The Hāna Belt Road National Historic District derives its character from its winding narrow road as well as from its historic bridges. That is why constructing a new bridge on a new road alignment while leaving the old bridge in place (e.g. Alternative A, Hāhālawe and Koukou'ai Stream Bridges) is unacceptable. Please eliminate these alternatives from consideration.
- **Aesthetics:** Is there an aesthetically pleasing alternative to steel Thrie-beam end-treatment transitions proposed for all the bridges?
- **Temporary panel bridge:** Has the county given consideration to buying or renting a panel bridge to place over the existing bridge structures while repairs are made below? Such a panel bridge could be removed when construction is complete, and set up at the next location. It seems this approach may be cost-effective and would mitigate some of the environmental impacts associated with the construction of proposed temporary bypass bridges proposed for Kapi'a, Waiohonu, Papahawahawa, 'Alaalaula, Paihī, Pu'uhao'a, Wai'ele, Hāhālawe, and Koukou'ai Bridges.

- **Bridge Names:** In addition to the construction dates, we hope you will consider also inscribing bridge names onto the bridges. This would be helpful and appreciated in reclaiming place names in the Hāna District.
- **Spelling correction:** In Place Names of Hawai'i, (Pukui, Ebert and Mookini, 1974), "Papahawahawa" is spelt "Papahawahawa," not *Papa'ahawahawa*.

Thank you for the monumental progress you've made towards saving Hāna Road's cherished bridges.

Sincerely yours,



Elizabeth Russell, AHEM Steering Committee

Cc Wilson Okamaoto and Associates
State Historic Preservation Office

JAMES "KIMO" APANA
Mayor
DAVID C. GOODE
Director

MILTON M. ARAKAWA, A.I.C.P.
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September 19, 2001

Ms. Elizabeth Russell
Steering Committee
Alliance for the Heritage of East Maui
Hana, Hawaii 96713

SUBJECT: REVISED DRAFT PRESERVATION PLAN FOR COUNTY OF MAUI BRIDGES
WITHIN THE HANA HIGHWAY HISTORIC DISTRICT

Dear Ms. Russell:

Thank you for your letter dated August 12, 2001, commenting on the subject Preservation Plan. We appreciate your recognition of the progress made to date and offer the following in response to your specific comments:

1. The preservation will serve as a basis for starting discussions on specific issues such as the design details and construction bypass as each bridge proposal is reviewed through the environmental assessment and SMA permit process. We acknowledge your preference for Alternative B for Alalalaula and Hahalawe Stream Bridges and Alternative C for Koukou'ai Stream Bridge and look forward to working with you as these bridges are addressed through their respective environmental assessments and SMA permit process.
2. We acknowledge your preference for alternatives that do not involve constructing a new bridge on a new alignment. We cannot, however, eliminate such alternatives from consideration at this time. According to the Detailed Preservation and Rehabilitation Guidelines from the State of Hawaii Bridge Inventory and Evaluation (Draft Report, May 1996), alternatives involving "Continued Use for Non-vehicular Purpose" have priority over "Replacement with Mitigation." Nevertheless, your concern for preserving the character of the Historic District can be considered in determining the preferred alternative during the respective environmental assessments and SMA permit processes for these bridges.

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3. Due to concerns expressed about the use of steel guardrails, the Final Preservation Plan will recommend the use of rock wall guardrails along the approaches to the bridges. The rock wall guardrail would be a "crash-tested" design that may alternatively be constructed of lava rock with necessary reinforcement, a reinforced-concrete wall veneered with native lava rock or a reinforced-concrete wall finished appearing as lava rock. According to an official of the Federal Highway Administration (FHWA), the side of the wall facing the road may have a relief no greater than 3/4-inch, in order to prevent it from "snagging" vehicles and causing them to spin when struck. Therefore, the type of construction to be used may be dictated by the feasibility and cost of achieving the required relief and structural strength. The public will have the opportunities to review and comment on the alternative construction methods during the environmental assessment and SMA permit process.
4. The DPWWM is acutely aware of concerns expressed by the community regarding road closure during construction work on the bridges. You may recall that the initial Draft Preservation Plan proposed two-lane replacement bridges, which could be constructed one lane at a time to maintain traffic flow. By going to the single-lane alternative, the options for maintaining traffic flow during construction are limited. The DPWWM will seriously investigate temporary spans along with other bypass options, but each situation is different and the level of investigation required to assess alternatives and feasibility for each is beyond the scope of the Preservation Plan. As the design for each bridge progresses, the public and CRC will be consulted in conjunction with the environmental assessment and Special Management Area (SMA) permit process regarding its design, as well as temporary bypass alternatives.
5. The final Preservation Plan will recommend inscribing bridge names unless there is a specific concern that doing so on a particular bridge will detract from the character of the Historic District. A historical architect will be consulted regarding the appropriate location and style of inscriptions for each bridge and the public will have an opportunity to comment on the recommended inscription during their respective environmental assessment and SMA permit process.
6. The difficulty in identifying the bridges is the discrepancy among references to them. "Papaahawahawa" is shown on the U.S.G.S. map and prior historic bridge inventories refer to the same or to "Papaahawahawa." For the Final Preservation Plan, we will use "Papaahawahawa", as recommended, but we will remain receptive to additional discussion regarding the inscription for the replacement bridge.