Appendix D—Correspondence

DEPARTMENT OF PARKS & RECREATION

CITY AND COUNTY OF HONOLULU

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KIRK CALDWELL
MAYOR

TONI P. ROBINSON
DIRECTOR

JEANNE C. ISHIKAWA
DEPUTY DIRECTOR

May 22, 2013

Mr. Daniel Grabauskas
Executive Director and CEO
Honolulu Authority for Rapid Transportation
City and County of Honolulu
1099 Alakea Street, Suite 1700
Honolulu, Hawaii 96813

Dear Mr. Grabauskas:

RE: Mother Waldron Neighborhood Park; Honolulu Rail Transit Project

The Honolulu Authority for Rapid Transportation (HART) has consulted with the City and County of Honolulu Department of Parks and Recreation (DPR) pursuant to Section 4(f) of the Department of Transportation Act and other laws with regard to the potential effects of the Honolulu Rail Transit Project (HRTP) on Mother Waldron Neighborhood Park and Playground (Playground). DPR previously provided comments on the Draft Environmental Impact Statement and the Section 4(f) analysis regarding the HRTP. HART reinitiated consultation with DPR regarding the potential effects of the HRTP on the park usage after the December 2012 decision of the District Court for the District of Hawaii in Honolulutraffic.com v. Federal Transit Administration.

The Honolulu Park Board approved plans for the Playground in 1936, and Works Progress Administration workers completed the Playground in 1937. At that time, the Playground occupied 1.8 acres.

1n 1991-1992, the Hawaii Community Development Authority realigned Halekauwila Street, taking approximately 17%, or 12,700 square feet, of the Playground on the mauka end of the Playground (the playground end intended for use by younger children). The mauka end of the Playground lost its basketball and volleyball courts, wall and benches. The original playground equipment (parallel bars, swings, seesaw and sandbox) was replaced with modern playground equipment. The playground area in the mauka portion of the Playground was again reconfigured around 2006, adding a children's climbing structure.

Approximately 1.5 acres remain of the 1.8-acre original playground.

The current recreational features of the Playground include a playground with a climbing structure, basketball courts, volleyball courts, benches and open grass areas that are used for informal sporting activities, picnicking and daytime resting. Students from Voyager Public Charter School use the Playground. A farmers' market with a typical attendance of 5 vendors and 75 customers per week is held at the Playground on Monday mornings.

Basketball, playground, picnicking and volleyball are the activities designated for the Playground. Between 2009 and 2012, DPR has permitted various organized uses of the Playground.

A survey of park activity conducted by HART between November 9, 2012, and November 20, 2012 shows that the primary use of the Playground is by residents who camp in the Playground with sleeping mats, blankets, food coolers and bags, and wash and dry laundry around the comfort station. Nighttime observation indicated that this group of daytime users leaves the Playground during its hours of closure. Use by this resident population is concentrated around the comfort station.

Walkers, joggers, and dog walkers using or crossing the Playground were the second-most frequently observed use, followed by basketball, play-structure and bicycling use. Observed organized sporting events included a youth sports day and coaching of youth basketball skills. The majority of recreational use occurs in the makai portion of the Playground. Only the limited use of the play-structure is located adjacent to Halekauwila Street. Non-recreational uses included a weekly farmers' market and food bank delivery to neighborhood elderly.

The Playground qualifies for protection under Section 4(f) because (1) it is eligible for listing on the National Register under Criterion A, for its association with the national playground movement, and under Criterion C, for its architectural and landscape design by Harry Sims Bent, and (2) it is a public park. DPR concurs that overall (combined) proximity impacts would not substantially impair the activities, features, or attributes that qualify the Playground for protection under Section 4(f).

The Playground's setting is not an element of its National Register eligibility. We concur with HART's assessment that the Playground's setting has already been substantially altered, both by the fact that the buildings and uses that originally surrounded the Playground no longer exist and by the fact that the Playground's size and configuration were altered in the 1990s.

We also concur that the Playground's association with the national playground movement (Criterion A) will be unaffected by the HRTP's proximity to the mauka Playground boundary. To the extent that the Playground's equipment, architecture and layout still retain elements of the original design and features (Criterion C), the HRTP will not affect them. It will be located adjacent to the part of the Playground that retains the least integrity with respect to the original design and equipment, and will not, in any case, alter the design or intended use of the Playground.

The HRTP's proximity will not substantially impair the features and uses of the Playground. HART's recreational use survey indicates that the largest number of Playground users, who use the Playground as a living and resting space during the hours that it is open, are not sensitive to context. The HRTP would increase access for them (and for other users) but would not impair their use of the Playground. Other non-recreational users, such as dog walkers, joggers, picnickers and people who use the Playground for the farmers' market, will not be substantially impaired by the existence of the HRTP outside the Playground's boundaries.

The basketball and volleyball courts are at the end of the Playground farthest from the HRTP. Users of the courts will see the HRTP if they look towards the mauka end, where the view currently is of an apartment building. We concur with HART's conclusion that this change in the view will not substantially impair their recreational use.

The playground equipment for young children is closest to the HRTP, at the mauka end of the Playground. At present, users at the mauka end of the Playground look out across a street to an apartment building. The view of the apartment building will now be interrupted by the HRTP's pillars. We concur with HART's conclusion that this alteration in the view will not substantially impair the use of the mauka end of the Playground. The shade that the HRTP pillars and guideway provide during morning hours may be beneficial to users at that end of the Playground.

The HRTP will not restrict access to the Playground; in fact, HRTP will likely increase recreational use of the Playground, since two Rail stations are in close proximity. The effect of the HRTP will probably be overshadowed by the effect of the major high-rise projects planned for the property adjacent to the Playground. We anticipate more people using the Playground, both when people move into the high-rises, and when the HRTP is completed. Certainly, the Playground's comfort station usage will increase as a result of the HRTP, unless toilet facilities are provided at the HRTP station one block from the Playground. Increased use of the Playground is consistent with DPR's goal of maximizing park and recreational benefits to the public within limited available resources.

The HRTP would have little effect on the existing noise level at the Playground, and the noise analysis conducted by HART demonstrated that the HRTP would not cause a noise impact at the Playground. Vibration impacts from the HRTP will meet criteria protecting places where people sleep, and there will be no pile driving near the Playground to cause construction impacts. We concur with HART's analysis that these proximity impacts will not substantially impair any of the features that provide the Playground with protection under Section 4(f).

Therefore, DPR supports your non-use determination of the Playground, for the purpose of reconsideration of the Section 4(f) Non-Use Determination for Mother Waldron Neighborhood Park.

Should you have questions, please contact Rosalind Young, West Honolulu District Manager, at 522-7070.

Sincerely,

Toni P. Robinson

Toni P. Robinson
Director

HART

HONOLULU AUTHORITY for RAPID TRANSPORTATION

IN REPLY REFER TO:
CMS-AP00ENV-00238

Daniel A. Grabauskas
EXECUTIVE DIRECTOR AND CEO

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April 17, 2013

Ms. Pua Aiu, Ph.D., Administrator
State Historic Preservation Division
Department of Land and Natural Resources
Kakuhihewa Building
601 Kamokila Boulevard, Suite 555
Kapolei, Hawaii 96707

Dear Dr. Aiu:

Subject: National Register of Historic Places (NRHP) Registration Form for Mother Waldron Playground, Honolulu Rail Transit Project (HRTP)

Please find enclosed a draft NRHP Registration Form for Mother Waldron Playground for your review and comment. Per Stipulation VI.C.2 of the Section 106 of the National Historic Preservation Act Programmatic Agreement for the HRTP, SHPD has 30 days to review and comment on NRHP Registration Forms.

Since Mother Waldron Playground was already listed on the Hawaii Register of Historic Places on June 9, 1988 as an element of the thematic group, "City and County of Honolulu Art Deco Parks," no additional coordination with your office is required regarding Stipulation VI.C, 3.

Please contact Mr. Stanley Solamillo of HART at (808) 768-6187 if you have any questions or if we can help facilitate your review in any way. Thank you for your continued support and review of this project.

Sincerely,

for Daniel A. Grabauskas
Executive Director and CEO

Enclosure

cc: Ms. Angie Westfall, SHPD
Ms. Faith Miyamoto, HART
Ms. Joanna Morsicato, HART

United States Department of the Interior
National Park Service

National Register of Historic Places Registration Form

This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in National Register Bulletin, *How to Complete the National Register of Historic Places Registration Form*. If any item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions.

1. Name of Property

Historic name: __Mother Waldron Playground_____

Other names/site number: __ N/A _____

Name of related multiple property listing**:**

_____N/A_____

(Enter "N/A" if property is not part of a multiple property listing

2. Location

Street & number: _Bounded by Coral, Halekauwila, Pohukaina, and Cooke streets_

City or town: _Honolulu_____ State: _Hawaii_____ County: _Honolulu_____

Not For Publication: ☐ Vicinity: ☐

3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act, as amended,

I hereby certify that this ___ nomination ___ request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60.

In my opinion, the property ___ meets ___ does not meet the National Register Criteria. I recommend that this property be considered significant at the following level(s) of significance:

___national **___statewide** **___local**

Applicable National Register Criteria:

___A **___B** **___C** **___D**

Signature of certifying official/Title: **Date**

State or Federal agency/bureau or Tribal Government

In my opinion, the property ___ meets ___ does not meet the National Register criteria.

Signature of commenting official: **Date**

Title : **State or Federal agency/bureau or Tribal Government**

4. National Park Service Certification

I hereby certify that this property is:

___ entered in the National Register

___ determined eligible for the National Register

___ determined not eligible for the National Register

___ removed from the National Register

___ other (explain:) _____

Signature of the Keeper Date of Action

5. Classification

Ownership of Property

(Check as many boxes as apply.)

Private:	
Public – Local	X
Public – State	X
Public – Federal	

Category of Property

(Check only **one** box.)

Building(s)	
District	
Site	X
Structure	
Object	

Number of Resources within Property
(Do not include previously listed resources in the count)

Contributing	Noncontributing	
1		buildings
1	2	sites
		structures
		objects
2	2	Total

Number of contributing resources previously listed in the National Register 0

6. Function or Use
Historic Functions
(Enter categories from instructions.)
RECREATION AND CULTURE/outdoor recreation

Current Functions
(Enter categories from instructions.)
RECREATION AND CULTURE/outdoor recreation
LANDSCAPE/park

7. Description

Architectural Classification
(Enter categories from instructions.)
MODERN MOVEMENT
Moderne

Materials: (enter categories from instructions.)
Principal exterior materials of the property: _CONCRETE, ASPHALT, STONE_

Narrative Description
(Describe the historic and current physical appearance and condition of the property. Describe contributing and noncontributing resources if applicable. Begin with **a summary paragraph** that briefly describes the general characteristics of the property, such as its location, type, style, method of construction, setting, size, and significant features. Indicate whether the property has historic integrity.)

Summary Paragraph

Mother Waldron Playground is located between Halekauwila, Cooke, Pohukaina, and Coral streets. It is a modest park constructed in 1937 as a 1.76 acre (77,000 square feet) playground; it has been substantially altered from its original design since its initial construction, most recently in the 1990s. Built elements within the park include a comfort station and remaining portions of a low wall that encompasses the original park. The built components contain reserved design elements of the Art Moderne style, including a horizontal emphasis, rounded corners and piers, and streamlined appearance. Mother Waldron Playground has undergone several major alterations since its initial construction, including removal and replacement of some of the park's original features, and subsequent large expansions to compensate for other changes. The playground's setting just Diamond Head (southeast) of downtown Honolulu has transitioned from a mixed residential, commercial, and industrial area at the time of the park's construction into a major light industrial area now redeveloping into a mixed-use district.

Narrative Description

Architectural and Landscape Description

The playground has an essentially rectangular footprint and is divided into two halves: a large, Diamond Head (southeastern) grassy area and an Ewa (northwestern) paved area with an oval grassy center surrounded by a perimeter wall. A centrally located comfort station and low wall divides the two halves. Additional green space adjacent to the park is created by Coral Street's closure to vehicular traffic.

Ewa, Paved Area

The paved area is the original section of the park. It contains low walls, benches, a comfort station, and covered walkways all constructed of concrete brick. The brick has been painted tan throughout the park.

The paved area's landscaping consists largely of asphalt. Sandstone flagstone is used below the covered walkways and in the area in front of the comfort station's Ewa (northwest, Coral Street) elevation. The round elevated platform on the Ewa elevation is paved with the same flagstone. Ewa of this comfort station is an oval, grassy area. At the opening to Coral Street, the same sandstone flagstone is used and surrounded on either side by asphalt. Monkeypod and Royal Poinciana trees are found within the paved area as well as along the Coral Street perimeter wall. The paved area on the park's makai (southwest, Pohukaina Street) end contains two volleyball courts and one basketball court. The paved area on the park's mauka (northeast, Halekauwila Street) end contains small playground equipment. Clay brick, rather than the pervasive concrete brick, is used to border the sidewalk outside and around the paved park as well as provide paving at each convex curve entrance to the park.

Walls

Mother Waldron Playground's paved area is surrounded by an approximately three foot high perimeter wall. The wall is roughly nine inches thick. Along Coral Street, this wall zig-zags forming triangular points and provides a wide opening into the park. This wall is original. On the park's mauka and makai sides, the walls form rectangular zig-zags. Of these wall sections, neither are in their original locations nor contain original materials. The entire perimeter wall on Coral, Halekauwila, and Pohukaina streets is divided into three sections separated by two rows of recessed brick. The middle section of wall is perforated with alternating vertical and horizontal openings. Concrete coping on top of the wall consists of alternating zig-zag and straight edges and is slightly recessed from the wall's edges. These zig-zags hint at modest Art Deco stylistic influences, though the low wall expresses heavy influence from the streamlined, Art Moderne style. Three of the wall's four corners are convex curves with entrances into the park from the sidewalk. These entrances are anchored on either side by rounded piers. Rounded piers are also found on the park side of Coral Street's zig-zag wall junctures. The perimeter wall's Diamond

Head corner at Halekauwila Street is squared, does not allow access into the park, and is not original.

A lower, one foot high wall topped with terracotta tile runs along the paved area's Diamond Head border. This low wall connects to the higher wall at Halekauwila Street, connects to benches at the comfort station, then continues on the makai side of the comfort station before turning toward the open grassy area of the park and coming to an end.

Benches

Benches within Mother Waldron Playground are found in the alcoves created by the perimeter wall as well as in the middle of the park. These seating areas are fixed, permanent, built-in park fixtures. Along Coral Street, the triangular alcoves are filled with curved benches, whereas straight benches are found along Halekauwila and Pohukaina streets and the low wall separating the paved and grassy areas. The curved benches are original while the straight benches along Halekauwila and Pohukaina streets are not original. Two straight benches are found in the middle of the paved area and are original to the playground. Curved benches also follow beneath the comfort station's curved covered walkways, separating the paved area from the grassy area. All benches are narrower at the base than at the top, forming a triangular profile. The benches are topped with the same terracotta tile found on the park's low wall.

Comfort Station

The comfort station consists of a rectangular building flanked on either side by a curved covered walkway. The covered walkways' curves follow along the paved area's central grassy oval. The comfort station is single-story, low and horizontal, with a flat roof lined with zig-zag coping identical to that found on the perimeter walls. It is built of concrete bricks. Two rows of recessed concrete brick form horizontal lines across all of the building's facades near the water table and roofline. The comfort station displays influences of the streamlined, Art Moderne form and style.

At the comfort station's Ewa elevation, a central alcove lined with vertical pilasters forms the backdrop of a round, elevated platform. On either side of this alcove are open-air windows with vertical concrete grilles. The recessed row near the roofline intersects with the covered walkways' curved, flat roof. These covered walkways are supported by round columns with a horizontal band of recessed brick at the same level as the recessed brick at the comfort station's water table. The covered walkways' flat roofs project slightly over the piers. Where the covered walkways intersect with the Ewa elevation, a rounded wall the width of the covered walkway columns supports the walkway's roof and attaches to the building facade. These walls also help shield the entrances to the restrooms.

At the comfort station's mauka and makai elevations are open entrances to men's and women's restrooms. Drinking fountains are found in small oval alcoves near the entrances. Above the restroom entrances, the covered walkways' roofs intersect with the recessed row of brick near the roofline. On both the mauka and makai elevations, covered walkway columns abut the

comfort station. Diamond Head of each abutting covered walkway column is one small window identical to those found on the comfort station's Ewa elevation.

At the building's Diamond Head elevation, a small room projects from the center of the building. A small semi-circular roof projects from the top row of recessed brick to cover the entrance to the small room. The entrance is found on the makai side and is shielded from view by a short wall resembling the park's perimeter wall. This wall shares the same coping as the perimeter walls but is not perforated and contains no rows of recessed concrete brick. The projecting room's Diamond Head elevation also contains no recessed brick at the water table level. On the projecting room's mauka and Diamond Head elevations are two large vent openings covered by a metal grate. Four windows identical to those on the comfort station's Ewa elevation are found on the Diamond Head elevation, two on either side of the projecting room.

The comfort station's interior consists of two nearly-identical restrooms. Both contain one sink, several stalls, and a partially-enclosed changing area. The men's room contains a single urinal. The concrete walls and stall dividers are clad with white tile to the height of the stall walls. Above the tile the walls are painted. The stall doors are wood. The restroom floors are concrete. Although no plans for the comfort station interior were found, these interiors likely coincide with the comfort station's 1968 renovations.

Diamond Head, Grassy Area

Mother Waldron Playground's Diamond Head, rectangular grassy area was added to the park following Halekauwila Street's realignment in 1991-1992. Bound by Halekauwila Street, Cooke Street, Pohukaina Street and the original 1937 playground, this area contains no buildings, walls, benches, paving, or playground equipment. A brick, almond-shaped marker topped by a cast iron fence sits at the grassy area's corner at Halekauwila and Cooke streets. This marker is labeled *kapu*. *Kapu* means "forbidden" or "sacred," and the marker encircles an area where human remains were reinterred following Kakaako improvement projects in the 1990s. Royal Poinciana trees line the grassy area along Cooke Street with monkeypod trees clustered at the tree line's ends.

Former Coral Street Area

Mother Waldron Playground's Ewa area was added to the park around 1994-1995.[1] The area, formerly a portion of Coral Street, was closed between Halekauwila and Pohukaina streets following the completion of the 1991-1992 street realignment project. At both the mauka and makai ends of the former Coral Street area, trees were planted. Grass replaced the street pavement, but a small rectangular section of pavement remains near the former Coral Street entrance to Mother Waldron Playground.

[1] Letter from Michael N. Scarfone, Executive Director, Hawaii Community Development Authority, to Dona L. Hanaike, Director, Department of Parks and Recreation, December 14, 1994.

Alterations

Mother Waldron Playground has undergone major changes since its original construction. According to its Hawaii Register of Historic Places nomination form, completed in 1988, initial changes included renovations to the comfort station in 1968 and resurfacing the area in 1978. At that time, the park was bounded by Lana Lane on its Diamond Head border. The large grassy area now a part of the park contained commercial, residential, and industrial buildings for the majority of the playground's history.

In the 1980s, the Hawaii Community Development Authority (HCDA) began plans to help revitalize the industrial Kakaako area. Included in these community development plans were road reconfigurations aimed at improving Kakaako traffic patterns. In 1991-1992, the HCDA undertook street improvements along Halekauwila Street, among others. This realignment of Halekauwila Street required a taking of approximately 12,700 square feet of Mother Waldron Playground on the playground's mauka end; this represents approximately 17% of the original park that is no longer included in the present park.[2] To mitigate the taking and the subsequent diminished park size, the developed area Diamond Head of Lana Lane was removed. Lana Lane, separating the playground from the developed area, was also removed. Mother Waldron Playground was subsequently enlarged by approximately 54,000 square feet Diamond Head.[3] Although this 54,000 square foot area was officially designated for future use as part of Mother Waldron Playground, Coral Street's closure on the park's Ewa side was never officially considered part of the park until the mid-1990s when improvements were made to the former Coral Street area. This final change to Mother Waldron Playground's boundaries grew the park by an additional 25,800 square feet.

As a result of the taking, the mauka end of the playground lost its basketball court, perimeter wall, and benches. A perimeter wall and benches nearly identical to the original were reconstructed along Halekauwila Street, but the wall now connects to the original low wall topped by terracotta tile that remains extant; the tile was not used on the replacement wall. There is no longer a convex curved entrance at the original playground's Halekauwila Street and Lana Lane corner due to the alterations. The original court and play area was replaced with modern playground equipment.

Along Pohukaina Street, road widening related to district improvements forced the perimeter wall and benches to be removed and reconstructed approximately five to ten feet inside the playground's original boundary. To open Mother Waldron Playground to its newly-acquired 54,000 square feet Diamond Head, a higher wall running along Lana Lane and intersecting with the rear of the comfort station was removed and never replaced. The original handball court was also removed and never replaced.

[2] Documentation completed in 1985 stated that 8,400 square feet of Mother Waldron Playground would be removed due to Halekauwila Street's realignment; however, following realignment, plat maps indicate approximately 12,700 square feet was removed.
[3] State of Hawaii, et al., *Final Supplemental Environmental Impact Statement for the Kakaako Community Development District Plan* (Honolulu: Hawaii Community Development Authority, 1985), IV-45.

8. Statement of Significance

Applicable National Register Criteria
(Mark "x" in one or more boxes for the criteria qualifying the property for National Register listing.)

- [x] A. Property is associated with events that have made a significant contribution to the broad patterns of our history.
- [ ] B. Property is associated with the lives of persons significant in our past.
- [x] C. Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.
- [ ] D. Property has yielded, or is likely to yield, information important in prehistory or history.

Criteria Considerations
(Mark “x” in all the boxes that apply.)

- [ ] A. Owned by a religious institution or used for religious purposes
- [ ] B. Removed from its original location
- [ ] C. A birthplace or grave
- [ ] D. A cemetery
- [ ] E. A reconstructed building, object, or structure
- [ ] F. A commemorative property
- [ ] G. Less than 50 years old or achieving significance within the past 50 years

Areas of Significance
(Enter categories from instructions.)
SOCIAL HISTORY
ENTERTAINMENT/RECREATION
ARCHITECTURE
LANDSCAPE ARCHITECTURE

Period of Significance
1937 – 1945

Significant Dates
1937

Significant Person
(Complete only if Criterion B is marked above.)

Cultural Affiliation

Architect/Builder
Bent, Harry Sims

Statement of Significance Summary Paragraph (Provide a summary paragraph that includes level of significance, applicable criteria, justification for the period of significance, and any applicable criteria considerations.)

Mother Waldron Playground in Honolulu, Hawaii, is eligible for the National Register of Historic Places. It is significant under Criterion A in the area of social history and entertainment/recreation for its association with the organized play and playground movement in the United States during the early twentieth century, and under Criterion C in the areas of architecture and landscape architecture for its Art Moderne playground design. The period of significance spans from 1937, when construction commenced, until 1945, when the playground movement that supported supervised play largely ceased and Honolulu's Board of Parks and Recreation was formed to rehabilitate Oahu's parks following World War II.

Narrative Statement of Significance (Provide at least **one** paragraph for each area of significance.)

Historical Narrative

Hawaii History

Early History

Polynesian settlers arrived in the isolated and uninhabited Hawaiian Islands as early as 300 A.D., with subsequent migrations taking place from the eleventh century through fourteenth century. Traversing the Pacific Ocean, these settlers brought with them a traditional land-based management system comprised of chiefs and commoners, as well as staple crops like wild ginger, gourds, taro, sugarcane, coconut, and sweet potato. A distinct Hawaiian culture evolved over time, celebrating unique stories and deities, and keeping order through a *kapu* governance system based on a strict code of conduct. By the time English Captain James Cook came to the islands in 1778, the islands' population was estimated as high as 300,000. Captain Cook named the islands the Sandwich Islands in honor of the Earl of Sandwich.[4]

Hawaiian Kingdom

Originally existing as a collection of independently ruled districts, the Hawaiian Islands were united as a single kingdom in 1810 by King Kamehameha I. Contact with Western sailing vessels gave the king access to weaponry enabling him to defeat his rivals. The king's death in 1819 led to the *kapu* system's demise, and Protestant missionaries, whalers, and traders arrived

[4] Edward Joesting, *Hawaii: An Uncommon History* (New York: W.W. Norton & Co., 1972), 13, 15, 27.

in the islands bringing Christianity and spreading disease that decimated the local population. The Hawaiian Kingdom, recognized as a sovereign nation, entered into treaties with foreign nations; the first such treaty with the United States took place in 1826. In 1840 Hawaii signed its first constitution, creating a government structure that included a representative body. Westerners continued flocking to the islands, bringing changes to Hawaii's economic structure and profiting from its lands and ideal trade route location. Sugarcane's rise as Hawaii's staple crop increased demand for labor, bringing immigrant workers from across the world to Hawaii.

Annexation

By 1885, a group of non-native businessmen formed the Hawaiian League and began discussing Hawaii annexation. The group pressured King Kalakaua to sign the Bayonet Constitution, stripping much of the king's authority and transferring it to a legislature comprised of a Hawaiian League majority. The king relented and signed the Bayonet Constitution on July 6, 1887. In 1891, Queen Liliuokalani assumed the throne and unsuccessfully attempted to repeal the Bayonet Constitution. This power struggle resulted in the Hawaiian League's overthrow of the monarchy; this coup was aided by United States Minister to Hawaii John L. Stevens and United States troops. Hearing of the overthrow, President Grover Cleveland ordered an investigation and called for the reestablishment of Hawaii's monarchy. Hawaii's Provisional Government instead pushed for United States annexation but failed to receive the required two-thirds vote in the United States Senate.

When William McKinley became president in 1897, Hawaii's annexation became a priority. The 1898 Joint Resolution annexed Hawaii and the 1900 Hawaiian Organic Act officially made Hawaii a United States territory. Hawaii became the fiftieth state in 1959.

Kakaako

The Kakaako district is situated between Honolulu and Waikiki on Oahu. The area long existed as swampland, and under the rule of King Kamehameha I, was used for fishing, canoe landings, salt production, cultivating taro, and religious practices. Although Honolulu Harbor experienced rapid growth through the 1800s, few lived in Kakaako during this time. In 1848, much of Hawaii's lands were turned over to private ownership in what was called the Great Mahele; the land in Kakaako became part of the Bernice Pauahi Bishop estate. By 1876, however, a government map of Oahu labeled the area as the "Kakaako Salt Works" with no major roads passing through the area. Roads between Honolulu and Waikiki bypassed Kakaako to the north. A decade later, Kakaako obtained an "Immigration Depot" and was the location of a battery, but otherwise little development occurred in the area.[5]

Continued growth in Honolulu eventually forced Kakaako's transition from a sparsely populated industrial area into a densely populated residential and commercial district. Demand for land near Honolulu Harbor led to the shallow reef adjacent to Kakaako being filled in and developed,

[5] Oahu Government Survey 1876, Registered Map No. 1380 (Hawaii Land Survey Division); Wall, W. A., Honolulu and Vicinity 1887, Hawaiian Government Survey (Library of Congress).

expanding the land comprising Kakaako. Now-defunct Fort Armstrong was constructed on this infill near the mouth of Honolulu Harbor. Eventually, large tracts of Kakaako land held by the Bishop and Curtis Perry Ward estates were subdivided. With the Honolulu Iron Works and Hawaiian Tuna Packers establishing businesses in Kakaako, other small enterprises soon followed. Residents quickly arrived: Hawaiian, Japanese, Portuguese, Filipino, and Puerto Rican families all found a home in Kakaako. Largely residing within their own housing "camps," these varying cultural groups lived and worked side-by-side in Kakaako, creating what has been referred to as a microcosm of Hawaii.[6]

By the mid-twentieth century, Kakaako's population began to decline as residential areas slowly yielded to Kakaako's current industrial uses. The area also fell into disrepair, and efforts were made by the HCDA to improve roadway infrastructure within Kakaako, including realignment of Halekauwila Street.[7] Future plans for Kakaako include increased residential housing units, repopulating an area that was once a thriving community.

The Playground Movement

Playgrounds developed out of concern for the poor, aiming to help mold children and young adults into law-abiding citizens. Directors were hired to organize activities at the playgrounds, instilling a sense of order to the parks. This early urban reform movement was also seen as a means to help recent immigrants assimilate into American culture. The earliest playgrounds were developed by private investors who built these spaces for public use in the 1880s. In the following decades, cities took a greater role in providing public playgrounds and recreation areas for their residents. The 1906 Playground Association of America aimed to promote physical and mental well-being through playgrounds across the country and sent members to assess select cities' particular recreational needs. By the 1930s, many cities had created full-fledged recreation departments to deal with recreation management and operations.

Honolulu's public playground development followed the national pattern and was promoted early on by the women leaders of the Free Kindergarten and Children's Aid Association. The group established the first public playground in Chinatown at Beretania and Smith streets in 1911. Over the years, the organization functioned as Honolulu's recreation department until the city's Recreation Commission was created in 1922 through the efforts of Henry Stoddard Curtis. Curtis, a former secretary of the Playground Association of America, surveyed Honolulu and urged the city to create new parks and playgrounds. Honolulu established a park board in 1931, hired Harry Sims Bent as park architect in 1933, and by 1936, forty playgrounds and social centers were supervised by the Recreation Commission.

Much of Honolulu's growth in park, playground, and recreational facilities, including Mother Waldron Playground, can be attributed to increased federal assistance from New Deal programs in response to the Great Depression. Both the Federal Emergency Relief Administration (FERA)

[6] Marsha Gibson, *Kaka'ako As We Knew It* (Honolulu: Mutual Publishing, 2011).
[7] State of Hawaii, et al., *Final Supplemental Environmental Impact Statement for the Kakaako Community Development District Plan* (Honolulu: Hawaii Community Development Authority, 1985); Austin, Tsutsumi, and Associates, Inc., *Kakaako Traffic Study* (Honolulu: Hawaii Community Development Authority, 1991).

and the Civil Works Administration (CWA) provided manpower for Honolulu's park construction initiative. Additional manpower came by way of the Works Progress Administration (WPA) and the National Youth Administration (NYA), which allowed Honolulu to employ playground directors.

Playgrounds did not exist as places where children were free to play on their own. Play existed not only for healthy development, but also as an educational tool that required organization and supervision. Thus, playground directors were employed to monitor the children's activities and act as a role model. The director helped organize team games, schedule activities, and restrict playground access to bullies. Through their various activities, playgrounds and recreation centers were seen as alternative choices to youth gangs, delinquency, or wasted time.[8]

Following World War II, the playground movement largely ceased, as child development experts began supporting unstructured play as more beneficial to children's development. Supervised play at parks and playgrounds as it existed prior to the war largely ceased. Honolulu's Parks Board merged with the Recreation Commission to form the Board of Public Parks and Recreation in 1946. The new board was tasked to rehabilitate Oahu's damaged parks.[9] By the end of the 1940s, American playgrounds began turning their focus to playground equipment aimed to allow free play and imagination rather than supervised play supported by recreation leaders.[10]

Harry Sims Bent

Harry Sims Bent, Mother Waldron Playground's architect, was born in Socorro, New Mexico, in 1896. After graduating from the University of Pennsylvania, Harry Sims Bent began his career working for prominent New York architectural firm Bertram Goodhue Associates. Bent's early work consisted primarily of building projects in the Los Angeles, California area, including the Los Angeles Central Library and several buildings at the California Institute of Technology.

In the late 1920s, Bent arrived in Honolulu assigned with supervising construction of the Academy of Arts as a representative and "resident architect" of Bertram Goodhue Associates. Following the Academy of Art's completion, Bent remained in Hawaii, first acquiring work through Bertram Goodhue Associates but later for his own independent practice.

Bent originally volunteered his time working on plans for the Honolulu Park Board in the 1930s, but ultimately worked on nearly all projects undertaken by the Board up through 1939. He was considered one of the most talented architects in Hawaii in the late 1920s-30s, with prominent Bertram Goodhue Associates and independent works including the C. Brewer Building,

[8] Robert R Weyeneth and Ann K. Yoklavich, *1930s Parks and Playgrounds in Honolulu: an Historical and Architectural Assessment* (Honolulu: Department of Parks and Recreation, 1987).
[9] Ann K. Yoklavich, *Overview of Historic Honolulu Parks* (Honolulu: Department of Parks and Recreation, 1987), 4.
[10] Susan G. Solomon, *American Playgrounds: Revitalizing Community Space* (Lebanon, NH: University Press of New England, 2005), 22.

Hanahauoli School, the Pineapple Research Institute at the University of Hawaii, and several residences.[11]

Bent's first task for the Honolulu Park Board was the Ala Moana Park project in 1933. The park's designed features included the canal bridge, entrance portals, sports pavilion, banyan court, and lawn bowling green. Other Bent park projects included Mother Waldron Playground, Kawananakoa Playground, Ala Wai Clubhouse, the Haleiwa Beach Park structures, and the Lanakila Park comfort station. Utilizing popular Art Moderne and Art Deco design elements, he aimed to create a modern look for his park work, a break from typical park and playground design. Bent incorporated contemporary design aesthetics into his park plans, while earlier playground examples addressed only functionality.

Bent returned to the mainland around 1940, and settled in Pasadena, California, where he continued his landscape design work. Major works during his post-Hawaii period included the landscape plan for Hancock Park in Los Angeles and the master plan for the Los Angeles County Arboretum. Bent died in Pasadena on March 19, 1959.

Margaret "Mother" Waldron

Margaret "Mother" Waldron was born on August 12, 1873, in Honolulu of mixed Hawaiian and Irish heritage. Her career began at Pohukaina School where she taught the fourth grade. Mother Waldron's time outside of school was spent as a volunteer playground director at Atkinson Park and welfare worker in Kakaako. Her duties included coaching boys' football and baseball and teaching girls and women household duties and jam-making.

For her fiftieth birthday, the boys and girls of Kakaako gave Mother Waldron a pin bearing the word "mother." The pin became Mother Waldron's most prized possession. Mother Waldron was credited with nearly single-handedly ridding Kakaako of its gangs and turning their members into law-abiding citizens. She helped transform the district's unpleasant reputation and would be greeted with "Aloha Mother" throughout Kakaako.[12]

Margaret Waldron died at St. Francis Hospital on May 8, 1936, and was buried on May 10, Mother's Day that year.[13]

Mother Waldron Playground

Mother Waldron Playground was originally a 1.76 acre site bounded by Coral, Halekauwila, and Pohukaina streets and Lana Lane on a parcel that the 1914 Sanborn Fire Insurance map noted contained the City and County Stables. Honolulu acquired the parkland in 1930 and 1931 through purchases and deeds from the territory of Hawaii. After several years, the Park Board

[11] Steve Salis, "Playful Architecture," *Hawaii Architect* (June 1985): 12-13.
[12] "Guava Class at Kakaako is Waldron Plan," *Honolulu Star-Bulletin*, February 27, 1930, 4.
[13] "Death Claims Mrs. Waldron, Friend of Poor," *Honolulu Advertiser*, May 8, 1936, 1.

approved and implemented Harry Sims Bent's plans for the playground in 1936. WPA labor was used to construct the park.

The site of the future playground was proposed to be named in 1930 for Margaret "Mother" Waldron, but she refused the honor.[14] Her name was given to the park following her death in 1936. Costing approximately $50,000 to construct, Mother Waldron Playground opened September 20, 1937 to much fanfare, including a performance by the Royal Hawaiian Band.[15]

Original Appearance of Mother Waldron Playground

Bent planned the playground following his successful design features at Ala Moana Park, implementing contemporary design elements reflecting the Art Moderne style. The symmetrical playground, situated in a dense residential, commercial, and industrial area, was designed to emphasize utility as well as beauty. Bent used concrete bricks to construct Mother Waldron Playground's walls, benches, and comfort station.

A perimeter wall delineated the playground boundaries along Coral, Pohukaina, and Halekauwila streets and Lana Lane. The wall contained horizontal and vertical perforated openings and was comprised of several brick courses, with some courses recessed to create horizontal bands. Each of the park's corners contained a convex curve entry with rounded piers anchoring the walls' ends. Along Coral Street, the wall was executed in a triangular zig-zag form and opened to Coral Street, while Halekauwila and Pohukaina streets provided squared zig-zag walls. Lana Lane's wall was straight, did not zig-zag, and contained no horizontal bands or perforations. The entire perimeter wall was topped by recessed concrete coping with alternating straight and zig-zag edges.

Laid out symmetrically, the park's mauka end was to be used by younger children while the makai end was to be used by older children. An oval, grassy area and comfort station divided the two halves at the playground's center. The park utilized an Art Moderne style that was increasing in popularity during the time, yet seldom used for parks and playgrounds. Both sides contained volleyball, basketball, and shuffleboard courts. The mauka end contained swings and seesaws, while the makai end contained handball courts.

Bent's central Art Moderne feature was a comfort station that employed a streamlined and unornamented facade, rounded corners and columns, and covered walkways curving away from the comfort station. The comfort station contained men's and women's restrooms, drinking fountains at the entrances of both restrooms, and changing areas inside. At the comfort station's center, a raised and rounded platform provided an outdoor stage area with a pilaster-lined alcove backdrop. The stage, its surrounding area, and floor beneath the covered walkway were paved with the same sandstone flagstone found at the park's Coral Street entrance.

[14] "Playground Given Name of Pioneer," *Honolulu Advertiser*, February 19, 1930, 1.
[15] "Waldron Playground—Kakaako Beauty Spot," *Honolulu Advertiser*, September 20, 1937, 5; "Playground to Open Monday," *Honolulu Star-Bulletin*, September 13, 1937, 12; "$50,000 Mother Waldron Park Officially Opened," *Honolulu Advertiser*, September 21, 1937, 1.

Park benches topped with terracotta tile were found within the perimeter wall in alcoves created by the wall's zig-zag as well as in the middle of each play area. Most benches were straight, but the benches along the Coral Street wall curved to fit their spaces. An additional low wall topped with terracotta was located beneath the comfort station's covered walkway, running parallel to the higher wall along Lana Lane. Trees were planted in openings created by the perimeter wall's zig-zag shape, providing shade to the park's users.[16]

Mother Waldron Playground's Use of Contemporary Architectural Styles

Harry Sims Bent's design for Mother Waldron Playground reflected heavy influence from the streamlined Art Moderne style popular at the time. Art Moderne emphasized horizontal lines, flat roofs, smooth surfaces, and curvilinear edges. Art Moderne and its counterpart, Art Deco, which utilized vertical lines and geometric patterns, were seen as a rejection of classical architectural themes. Both design motifs embraced architectural elements deemed appropriate for the modern era. Bent was inspired by these national architectural trends, and desired to create a playground that was viewed as a contemporary design expression, moving beyond mere playground utility.[17]

Changes to Mother Waldron Playground

According to the 1988 Hawaii Register of Historic Places nomination form that included Mother Waldron Playground, renovations were made to Mother Waldron Playground's comfort station in 1968. The form does not state the extent of the renovations; a visual inspection indicated that no substantial alterations occurred, as many original features and finishes remained intact. Additionally, the Department of Parks and Recreation resurfaced the playground in 1978.[18] In 1991-1992, Halekauwila Street was realigned through Mother Waldron Playground, removing approximately 12,700 square feet of the original park's mauka end and a small portion along Pohukaina Street. To mitigate this taking, the city added approximately 54,000 square feet of Mother Waldron Playground and removed Lana Lane greatly enlarging the park. The expansion included extending the park Diamond Head, removing the park's bordering wall along Lana Lane, and reconstructing the park's perimeter walls along Halekauwila and Pohukaina streets.[19] In 1994-1995, Coral Street was closed between Halekauwila and Pohukaina streets and included in the expansion of Mother Waldron Playground, adding approximately 25,800 square feet to the park. These additions are now considered non-contributing sites within the greater Mother Waldron Playground site.

[16] Research did not provide the specific varieties of trees originally planted at Mother Waldron Playground.
[17] Weyeneth and Yoklavich, *1930s Parks and Playgrounds in Honolulu,* 16.
[18] Mother Waldron Playground, City & County of Honolulu Art Deco Parks Hawaii Register of Historic Places nomination form, April 20, 1988.
[19] See above Architectural and Landscape Description: Alterations.

Prior Documentation of Mother Waldron Playground

Mother Waldron Playground was listed in the Hawaii Register of Historic Places on June 9, 1988, as an element of the thematic group "City & County of Honolulu Art Deco Parks," prior to the extensive 1990s changes.

The playground was documented on a Determination of Eligibility form by Mason Architects, Inc. in 2008. This documentation assessed the property as eligible for listing in the National Register under Criteria A and C; the Hawaii State Historic Preservation Division (SHPD) concurred with this finding.

This nomination exists as part of the legal requirements in the *Programmatic Agreement Among the U.S. Department of Transportation Federal Transit Administration, The Hawaii State Historic Preservation Officer, The United States Navy, and the Advisory Council on Historic Preservation Regarding the Honolulu High-Capacity Transit Corridor Project in the City and County of Honolulu, Hawaii*.[20]

Information discovered while performing research for this nomination revealed substantial changes that occurred in the playground in the 1990s that were not described in the 2008 Determination of Eligibility form. This nomination considers those changes.

Significance Evaluation

Mother Waldron Playground is eligible for the National Register of Historic Places under Criterion A for its association with the national playground movement, which aimed to provide supervised play and character-molding opportunities. The property correlates with the rise of playground construction in urban areas throughout the United States.

Mother Waldron Playground is not eligible under Criterion B. Although the park is named in honor of Margaret "Mother" Waldron, the property is not associated with her productive life or her lasting contributions to the Kakaako community.

This property is also eligible under Criterion C for its architectural and landscape design by Harry Sims Bent. The property displays a streamlined Art Moderne appearance with some Art Deco elements, a modern approach and a display of Harry Sims Bent's desire to create a pleasing environment for the park's users. Contributing features to Mother Waldron Playground include the remaining original Art Moderne playground site and the streamlined comfort station building. Non-contributing features include an approximately 1.5 acre site nearly doubling the size of the remaining Mother Waldron Playground original site as well as the former Coral Street area. These non-contributing sites became an extension of Mother Waldron Playground

[20] *Programmatic Agreement Among the U.S. Department of Transportation Federal Transit Administration, The Hawaii State Historic Preservation Officer, The United States Navy, and the Advisory Council on Historic Preservation Regarding the Honolulu High-Capacity Transit Corridor Project in the City and County of Honolulu, Hawaii*, (January 2011).

following Halekauwila Street improvements in 1991-1992 and continued Kakaako district improvements through 1994-1995. Still, the retention of the playground's prominent Harry Sims Bent designed features, including the zig-zag wall and comfort station, allows Mother Waldron Park to be eligible under Criterion C.

The property retains its original historic function; thus, its period of significance for Mother Waldron Playground spans from its construction date in 1937 until 1945, when supervised play largely ceased and Honolulu's Board of Parks and Recreation was formed to rehabilitate Oahu's parks following World War II.

Social History

Mother Waldron Playground is associated with the playground movement across the United States and Honolulu's need for recreational facilities within urban areas. Playgrounds were viewed as a means to reform urban youth and help create law-abiding citizens through structured play.

Entertainment/Recreation

Mother Waldron Playground provided recreational facilities for urban-dwelling youth. The park did not allow children to play freely; instead, belief systems at the time required organized play for children overseen by a playground director.

Architecture and Landscape Architecture

Mother Waldron Playground is an example of Harry Sims Bent's architecture and landscape architecture work. At the time, Bent acted as the Honolulu Park Board's chief designer, planning parks and playgrounds throughout the 1930s. His Art Moderne with Art Deco design represented a modern approach for Mother Waldron Playground. Bent's design fulfilled the needs required by "organized play" by dividing the park into two halves for different age groups and also providing a comfort station for users. The park demonstrates Bent's desire to create a functional yet aesthetically pleasing urban playground.

Period of Significance

The period of significance for Mother Waldron Playground spans from 1937, when construction commenced, until 1945, when the playground movement that supported supervised play largely ceased and Honolulu's Board of Parks and Recreation was formed to rehabilitate Oahu's parks following World War II.

Integrity Evaluation

Mother Waldron Playground retains a moderate level of integrity of location. Original portions of the playground remain in place, but other areas originally associated with the playground are no longer part of the site, and other areas not historically part of the playground have been added.

The playground has a low level of integrity of materials, design, and workmanship. Halekauwila Street's realignment and the widening of Pohukaina Street have compromised the park's design, removing over 12,700 square feet of the original park boundaries and demolishing and replacing original features, diminishing the integrity of workmanship and materials. However, although many original features of the park have been removed and replaced, the playground retains a modest amount of original features, including most of the zig-zag wall and the comfort station, to demonstrate a low integrity of materials and workmanship. Mother Waldron Playground does not retain integrity of setting outside of the park; within the park open spaces and a general playground appeal contribute to a moderate level of integrity of setting. The Kakaako area has transitioned over time from a mix-use commercial and residential district to a largely industrial area. Mother Waldron Playground is now surrounded by these industrial buildings. Mother Waldron Playground retains its integrity of feeling as an Art Moderne-designed playground and its integrity of association with the early-1900s playground movement. Therefore, the playground retains integrity of feeling and association.

9. Major Bibliographical References

Bibliography (Cite the books, articles, and other sources used in preparing this form.)

"$50,000 Mother Waldron Park Officially Opened." *Honolulu Advertiser*, September 21, 1937.

Austin, Tsutsumi, and Associates, Inc. *Kakaako Traffic Study*. Honolulu: Hawaii Community Development Authority, 1991.

"Death Claims Mrs. Waldron, Friend of Poor." *Honolulu Advertiser*, May 8, 1936.

Gibson, Marsha. *Kaka'ako As We Knew It*. Honolulu: Mutual Publishing, 2011.

"Guava Class at Kakaako is Waldron Plan." *Honolulu Star-Bulletin*, February 27, 1930.

Joesting, Edward. *Hawaii: An Uncommon History*. New York: W.W. Norton & Co., 1972.

Letter from Michael N. Scarfone, Executive Director, Hawaii Community Development Authority, to Dona L. Hanaike, Director, Department of Parks and Recreation, December 14, 1994.

Mother Waldron Playground, City & County of Honolulu Art Deco Parks Hawaii Register of Historic Places nomination form, April 20, 1988.

"Playground Given Name of Pioneer." *Honolulu Advertiser*, February 19, 1930.

"Playground to Open Monday." *Honolulu Star-Bulletin*, September 13, 1937.

Salis, Steve. "Playful Architecture." *Hawaii Architect* (June 1985): 12-13.

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State of Hawaii, et al. *Final Supplemental Environmental Impact Statement for the Kakaako Community Development District Plan*. Honolulu: Hawaii Community Development Authority, 1985.

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"Waldron Playground-Kakaako Beauty Spot." *Honolulu Advertiser*, September 20, 1937.

Wall, W.A. Honolulu and Vicinity 1887, Hawaiian Government Survey. Library of Congress, 1887.

Yoklavich, Ann K. *Overview of Historic Honolulu Parks*. Honolulu: Department of Parks and Recreation, 1987.

Weyeneth, Robert R., and Ann K. Yoklavich. *1930s Parks and Playgrounds in Honolulu: an Historical and Architectural Assessment*. Honolulu: Department of Parks and Recreation, 1987.

Previous documentation on file (NPS):

____ preliminary determination of individual listing (36 CFR 67) has been requested
____ previously listed in the National Register
____previously determined eligible by the National Register
____designated a National Historic Landmark
____ recorded by Historic American Buildings Survey #_____
____recorded by Historic American Engineering Record # _____
____ recorded by Historic American Landscape Survey # _____

Primary location of additional data:

____ State Historic Preservation Office
____ Other State agency
____ Federal agency
____ Local government
____ University
____ Other

Name of repository: _____

Historic Resources Survey Number (if assigned): _____

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10. Geographical Data

Acreage of Property 3.76

Use either the UTM system or latitude/longitude coordinates

Latitude/Longitude Coordinates
Datum if other than WGS84:_____
(enter coordinates to 6 decimal places)

1. Latitude: 21.299251 Longitude: -157.858407
2. Latitude: Longitude:
3. Latitude: Longitude:
4. Latitude: Longitude:

Or
UTM References
Datum (indicated on USGS map):

☐ NAD 1927 or ☐ NAD 1983

1. Zone: Easting: Northing:
2. Zone: Easting: Northing:
3. Zone: Easting: Northing:
4. Zone: Easting : Northing:

Verbal Boundary Description (Describe the boundaries of the property.)

See Map Attachment

Boundary Justification (Explain why the boundaries were selected.)

Mother Waldron Playground's boundary includes the entire area presently called Mother Waldron Playground. This footprint includes a portion of the original playground, its Diamond Head expansion, and the former Coral Street area between Halekauwila and Pohukaina streets. Although the playground's size was altered in the 1990s, these changes did not affect the playground's use as a public playground. This boundary corresponds to the boundary concurred to by the Hawaii State Historic Preservation Division in an earlier 2008 eligibility assessment, despite 1990s changes to the playground.

The boundary encompasses all of the remaining original resources and features that comprise the property, as well as more recent additions. The National Register boundary has been prepared in accordance with guidelines established by the National Register Bulletin, "Defining Boundaries for National Register Properties."[21]

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11. Form Prepared By

name/title: Cultural Resources Team
organization: Honolulu Authority for Rapid Transportation
street & number: 1099 Alakea Street, 17th Floor
city or town: Honolulu state: Hawaii zip code: 96813
e-mail
telephone: (808) 566-2299
date: 2/1/2013

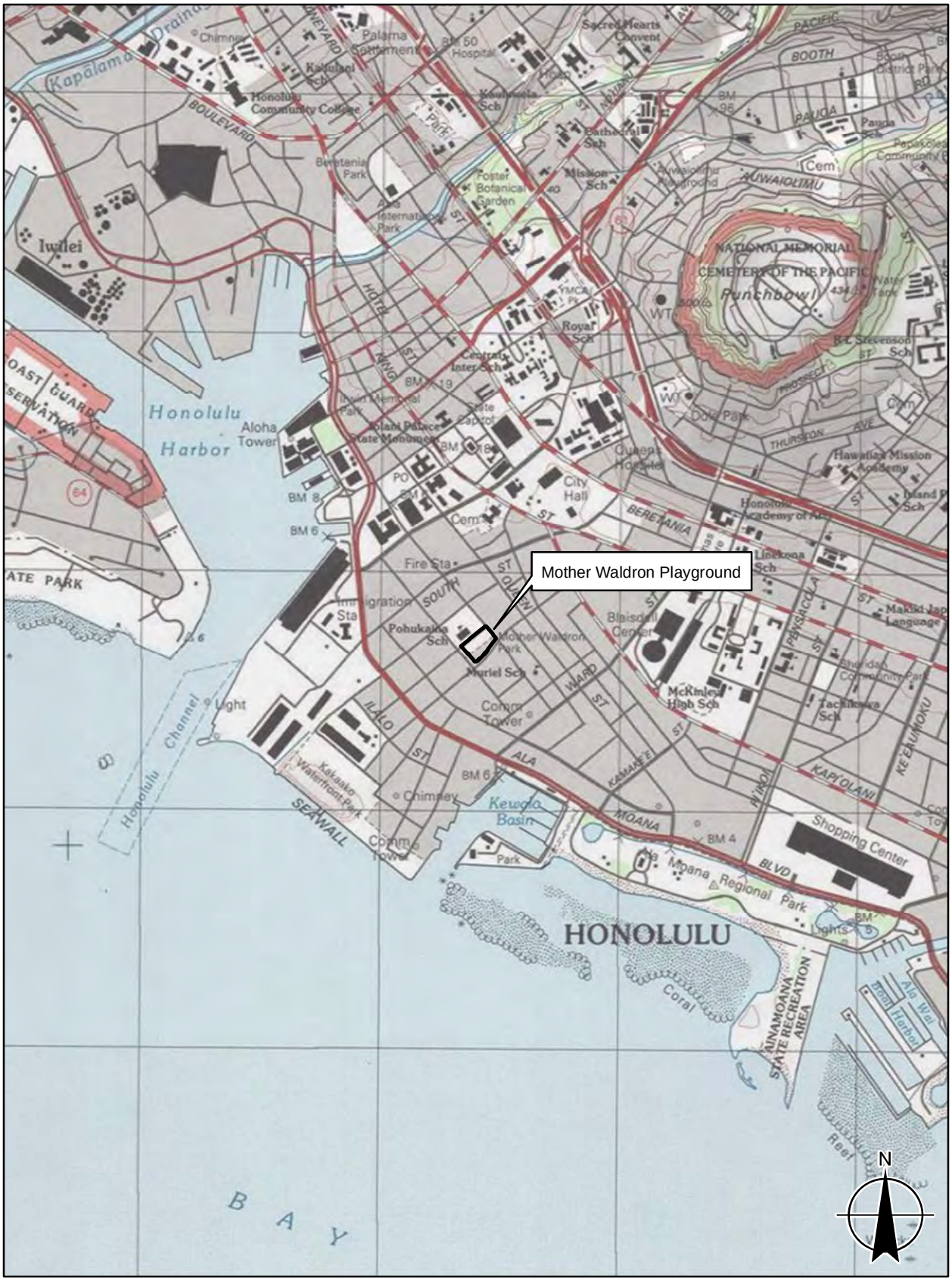
Additional Documentation

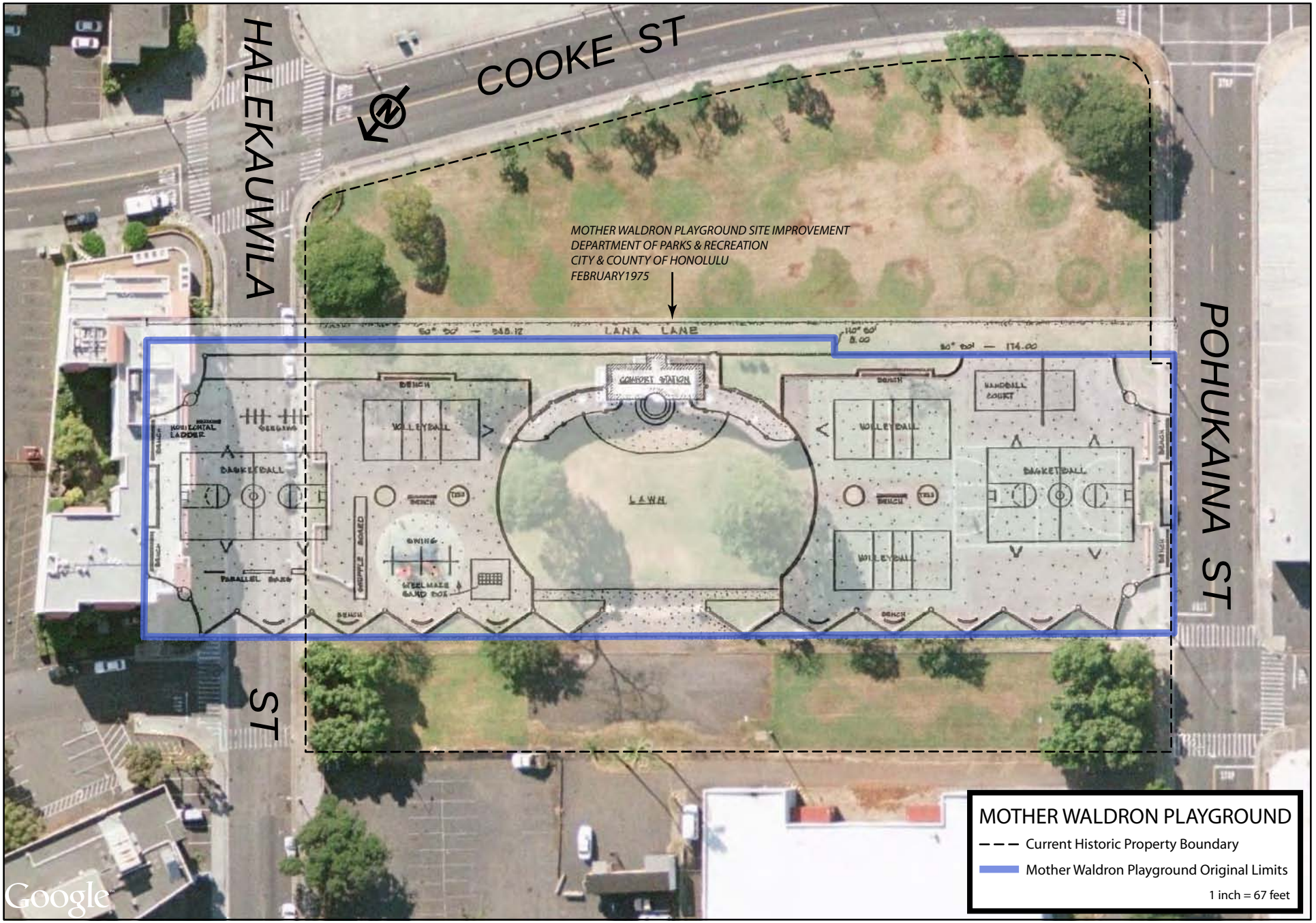
Submit the following items with the completed form:

- **Maps:** A **USGS map** or equivalent (7.5 or 15 minute series) indicating the property's location.
- **Sketch map** for historic districts and properties having large acreage or numerous resources. Key all photographs to this map.
- **Additional items:** (Check with the SHPO, TPO, or FPO for any additional items.)

[21] National Park Service, *National Register Bulletin: Defining Boundaries for National Register Properties* (Washington, D.C.: United States Department of the Interior, 1997).

Mother Waldron Playground


Mother Waldron Playground
Honolulu Harbor
Iwilei
Aloha Tower
Punchbowl
NATIONAL MEMORIAL CEMETERY OF THE PACIFIC
Honolulu Community College
Foster Botanical Garden
Royal Sch
City Hall
Queen's Hospital
Pohukaina Sch
Mother Waldron Park
Muriel Sch
McKinley High Sch
Blaisdell Center
Shopping Center
Kewalo Basin
Ala Moana Regional Park
HONOLULU
Coral
BAY
SEAWALL
Honolulu Channel
Light
Chimney
Comm Tower
Fire Sta
Immigration Sta
Palama Settlement
Sacred Hearts Convent
Hawaiian Mission Academy
Lincoln Sch
Makiki Jap Language
Tachikawa Sch
Punahou Sch
Central Inter Sch
Bethania Park
Kaiulani Sch
Kawananakoa Sch
Mililani Sch
Pauoa Sch
Cemetery
Golf Park
Kuhio Park Terrace
Kakaako Waterfront Park
Ala Moana Shopping Center
Kapalama Drainage
Kapalama Canal
Hotel St
King St
Beretania St
South St
Ala Moana Blvd
Kapiolani Blvd
Keeaumoku St
Pensacola St
Ward Ave
Ilalo St
Kamakee St
Hi'iaka St
Punchbowl St
Prospect St
Thurston Ave
Pacific Heights Rd
Booth St
Pauoa Rd
Nuuanu Ave
Alewa Heights
Kuliouou Community Park
Kaimuki Community Park
Palolo Community Park
Kaimuki District Park
Kuliouou Community Park
Ala Wai Harbor
Kuhio Beach Park
Waikiki Beach Park
Kapiolani Park
Diamond Head State Monument
Kaiser Hospital
Queen's Medical Center
Punahou School
Honolulu Zoo
Waikiki Aquarium
Kapiolani Community College
Kaiser Permanente Medical Center
Kuhio Beach Park
Waikiki Beach Park
Ala Moana Beach Park
Kaimuki Community Park
Palolo Community Park
Kuliouou Community Park
Kaimuki District Park
Ala Wai Harbor


COOKE ST
HALEKAUWILA ST
POHUKAINA ST
MOTHER WALDRON PLAYGROUND SITE IMPROVEMENT
DEPARTMENT OF PARKS & RECREATION
CITY & COUNTY OF HONOLULU
FEBRUARY1975
LANA LANE
COMFORT STATION
LAWN
VOLLEYBALL
BASKETBALL
HANDBALL COURT
SWING
SEESAW
PARALLEL BARS
HORIZONTAL LADDER
SHUFFLE BOARD
WEELMAKE & SAND BOX
BENCH
MOTHER WALDRON PLAYGROUND
Current Historic Property Boundary
Mother Waldron Playground Original Limits
1 inch = 67 feet
Google

Photographs

Submit clear and descriptive photographs. The size of each image must be 1600x1200 pixels (minimum), 3000x2000 preferred, at 300 ppi (pixels per inch) or larger. Key all photographs to the sketch map. Each photograph must be numbered and that number must correspond to the photograph number on the photo log. For simplicity, the name of the photographer, photo date, etc. may be listed once on the photograph log and doesn't need to be labeled on every photograph.

Photo Log

Name of Property: Mother Waldron Playground

City or Vicinity: Honolulu

County: Honolulu State: Hawaii

Photographer: Charles Greenleaf

Date Photographed: 11/17/2012

Description of Photograph(s) and number, include description of view indicating direction of camera:

1 of 8. View south toward Mother Waldron Playground from Halekauwila Street and Coral Street into original playground area

2 of 8. View north from Pohukaina Street and the former Lana Lane into original playground area

3 of 8. View northeast from wall along Pohukaina Street into original playground area

4 of 8. View southwest from Halekauwila Street and 1991-1992 expansion area toward original playground area

5 of 8. View north from Pohukaina Street toward original playground area and its former handball court

6 of 8. View northeast from Pohukaina Street toward original playground area and 1991-1992 expansion area

7 of 8. View northeast toward comfort station

8 of 8. View east toward comfort station from original playground entrance at Coral Street

Paperwork Reduction Act Statement: This information is being collected for applications to the National Register of Historic Places to nominate properties for listing or determine eligibility for listing, to list properties, and to amend existing listings. Response to this request is required to obtain a benefit in accordance with the National Historic Preservation Act, as amended (16 U.S.C.460 et seq.).
Estimated Burden Statement: Public reporting burden for this form is estimated to average 100 hours per response including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding this burden estimate or any aspect of this form to the Office of Planning and Performance Management. U.S. Dept. of the Interior, 1849 C. Street, NW, Washington, DC.

Photo 1.

Photo 2.

Photo 3.

Photo 4.

Photo 5.

Photo 6.

Photo 7.

Photo 8.

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

HART

'13 JUL -3 P2:22

WILLIAM J. AILA, JR.
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

ESTHER KIA'AINA
FIRST DEPUTY

WILLIAM M. TAM
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

HISTORIC PRESERVATION DIVISION
KAKUHIHEWA BUILDING
601 KAMOKILA BLVD STE 555
KAPOLEI HI 96707

DATE: April 23, 2013

LOG: 2013.2853
DOC: 1304RS71

TO: Daniel A. Grabauskas
Executive Director and CEO
Honolulu Authority for Rapid Transportation (HART)
1099 Alakea Street, Unit 1700
Honolulu, HI 96813

SUBJECT: **National Historic Preservation Act Section 106 Review**
Project: Mother Waldron Park National Register Nomination Update
Owner Name: City &County of Honolulu, HCDA, State of Hawaii
Address: Kakaako, Oahu
Tax Map Key: (1) 2-1-051:003,:005, :006 and Coral Street Right of Way between Pohukaina and Halekauwila Streets
Date Received by SHPD: April 23, 2013

SHPD has the following comments regarding the National Register nomination draft update:

Overall:

1. No footnotes to denote where specific information was taken from.
2. Define common local directions (mauka, makai, Ewa, and Diamond Head) at the beginning of the article both as to their immediate meaning (toward the mountains, etc.) and compass directions.
3. Please place appropriate pronunciation guides in parenthesis for Hawaiian language terms (such as O'ahu, Hawai'i, etc.) when first using these words.

Section 1: Name of Property: Please add the Tax Map Key (TMK): (1) (1) 2-1-051:003,:005, :006 and Coral Street Right of Way between Pohukaina and Halekauwila Streets as this is the way that SHPD files records.

Section 5: Classification: Number of Resources within Property: Please identify Contributing and Non-contributing Buildings and Sites at the bottom of this section.

Section 7: Description: Summary Paragraph:

1. Redundant discussion on alterations to park.
2. Are any further details available on physical changes within building?
3. Nothing is included on present condition of facilities (i.e. maintenance).
4. Did the concrete employed in the building employ the methods used at Ala Moana and other parks to use less cement by partially filling the molds with rubble?

Section 8: Statement of Significance:

1. There are no historic photographs included. Photographs should, for example, include the site, Mother Waldron herself, Atkinson Park, and Pohukaina School.

Section 8: Historical Narrative: Hawaii History:

1. Early History through Annexation has little or nothing to do with this park.

Overall: Background materials on the Kakaako neighborhoods are badly lacking. Maps showing the development of the neighborhood should be included. Coral Street, for example, is off grid because it was the original road to the low lying Leper Hospital. Successive Immigration Station buildings were erected along Ala Moana with the Hawaii Sugar Planters' Association's labor assignment office even closer into the center of this district. The potential residential use of this area was compromised early by the large coal piles stacked at the waterfront for both commercial shipping and military warships before the switch to oil-powered marine locomotion and the move by the US Navy to Pearl Harbor. Pohukaina School was originally where the State Library is, but was moved by Governor Frear to the property Ewa of what became Mother Waldron Park in order to take advantage of a Carnegie Grant. Kewalo (Kakaako is the Ewa side of Kewalo) was mostly poorly drained land and was the location of the second large landfill project (after the Honolulu Harbor waterfront). Other municipal and Territorial infrastructure projects included parks makai of Ala Moana and Ewa of Kewalo Basin, the development of two large waste material "crematoria" a ban on open burning of trash along the coast, and construction of the Kakaako Sewage Pump Station, Vocational School, etc. Atkinson and Mother Waldron Parks were where the children of the different ethnic camps (mark these on map) learned to co-exist and cooperate together (the foundation of our multi-cultural society). Nearby were a Japanese Buddhist Hongwanji temple, Portuguese Holy Ghost festivals, Congregationalist Mission, Catholic Church, "mom and pop" stores, etc. Source materials include Marsha Gibson's *Kakaako As We Knew It* and *Remembering Kaakako 1910-1950* from the University of Hawaii Center for Oral History.

Insert and expand a section on Education. The Territory made a considerable investment in a two story, fire proof building at Pohukaina School. This was done to "Americanize" the youth of this area, but also to raise educational standards and as part of a program of civic improvements. The park and school had an intimate relationship that is not discussed in this document. Add to the biography of Mother Waldron. How was Mother Waldron so successful in turning youth toward creative endeavors?

Insert a section on the Works Progress Administration (WPA) and its relationship to projects such as Mother Waldron Park.

Last paragraph: Even with the changes on the mauka side, the Park would still be recognizable to its designer, Bent. Under these circumstances, it retains integrity of materials, design, and workmanship.

Please resubmit the nomination to SHPD when these changes have been completed. Any questions should be addressed to Ross W. Stephenson, SHPD Historian, at (808) 692-8028 (office) or ross.w.stephenson@hawaii.gov.

Mahalo for the opportunity to comment.

Angie Westfall
Architecture Branch Chief, Hawaii Historic Preservation Division

HAWAII COMMUNITY DEVELOPMENT AUTHORITY

KAKAAKO KALAEOA

Neil Abercrombie
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Chairperson

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Ref. No.: PL GEN 1.28a

March 13, 2013

Ms. Joanna Morsicato
Deputy Chief, Planning and Environment
Honolulu Authority for Rapid Transportation
1099 Alakea Street, Suite 1700
Honolulu, Hawaii 96813

Dear Ms. Morsicato:

Re: National Register of Historic Places Registration Form for Mother Waldron Playground

Thank you for the opportunity to comment on the subject nomination form for the Mother Waldron Playground located in the Kakaako Community Development District Mauka Area. We offer the following comments on the application:

- The property, as presented in the narrative description, includes two areas that do not meet the significance criteria identified in Section 9, Page 11. The two areas include:

  a. A grassy area adjacent to the historic comfort station and perimeter walls. The grassy area is identified as TMK: 1-2-1-51: 003 and was constructed in 1992 as an expansion to Mother Waldron Playground under the Hawaii Community Development Authority's ("HCDA") Improvement District 3 project. The grassy area was previously owned by Kamehameha Schools and was comprised of two-story industrial warehouses built in the early 1950s.

  b. The former Coral Street, a functioning street, was closed and landscaped in the early 1990s.

  The significance criteria cited includes: (1) *Criterion A:* Area of social history and entertainment/recreation for its association with the organized play and playground movement in the United States during the early twentieth century; and

(2) *Criterion C:* Area of architecture and landscape architecture for its Art Moderne playground design. Neither the grassy area nor the former Coral Street are associated with the organized play and playground movement in the United States in the early twentieth century nor is of the Art Moderne playground design. These two areas should not be included as part of the historic Mother Waldron Playground.

We do, however, support the nomination of the comfort station, walls and benches designed by Harry Sims Bent. We note that this portion of Mother Waldron Playground (identified as TMKs: 1-2-1-51: 005 and 006) was placed on the Hawaii Register of Historic Places in 1989.

- In Section 7, Page 8, second paragraph, we note it was the HCDA, not the City and County of Honolulu that promulgated plans to revitalize the Kakaako District.

- In Section 7, Page 9, Item No. 8, Statement of Significance, the grassy area nor the former Coral Street are not associated with events that have made a significant contribution to the broad patterns of our history nor does it embody the distinctive characteristics of a type, period, or mention of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.

- Section 9, Page 13, second paragraph, it was the HCDA, not the City and County of Honolulu that made efforts to improve roadway infrastructure in the Kakaako Community Development District. The HCDA is a State agency.

In summary, we respectfully ask that the grassy area and the former Coral Street be removed from the property description and the project site be contained to the area designed by Harry Sims Bent, including the walls, benches and comfort station.

Should you have any questions regarding this matter, please contact Mr. Deepak Neupane, Director of Planning and Development, at 594-0300 or via email at: deepak@hcdaweb.org.

Sincerely,

Anthony J. H. Ching
Executive Director

AJHC/DN/ST:ak

U.S. Department
of Transportation
**Federal Transit
Administration**

REGION IX
Arizona, California,
Hawaii, Nevada, Guam
American Samoa,
Northern Mariana Islands

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Suite 1650
San Francisco, CA 94105-1839
415-744-3133
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JUN 06 2012

The Honorable William J. Aila, Jr.
Hawai`i State Historic Preservation Officer
Department of Land and Natural Resources
State of Hawaii
Kakuhihewa Building
601 Kamokila Bouleward, Suite 555
Kapolei, HI 96707

Attention: Dr. Pua Aiu, SHPD Administrator

Re: Determination of Eligibility and Finding of Effect on Traditional Cultural Properties (TCPs) for the Honolulu Rail Transit Project (HRTP), Sections (Phases) 1-3, in compliance with Stipulation II of the Programmatic Agreement (PA).

Dear Mr. Aila:

The Federal Transit Administration (FTA) is requesting your concurrence with the determination of eligibility and finding of effect relating to TCPs in HRTP Sections 1-3. This covers 13 ahupua`a, 26 wahi pana (sacred or storied places), 1 leina a ka`ukane and 10 inoa`āina (named places).

Of these 50 resources, the 13 ahupua`a (including Honouliuli) were not studied further since they are the larger traditional land divisions for the island of O`ahu that provide the context for consideration of individual wahi pana. This leaves 37 sites for further consideration. Fifteen of these sites were determined to be outside the HRTP's area of potential effects (APE). Twenty were determined not eligible for nomination to the National Register of Historic Places (NRHP), and 2 were determined eligible. A finding of **No Adverse Effect** was made for the two NRHP-eligible properties. No mitigation is required.

This letter and attachment document FTA and the Honolulu Authority for Rapid Transportation's (HART) compliance with the Programmatic Agreement (January 2011) associated with the HRTP and Record of Decision (January 2011) for Sections 1-3.

Attached to this letter is the:

Honolulu Rail Transit Project, Determination of Eligibility and Finding of Effect for Previously Unidentified Traditional Cultural Properties in Sections 1-3, May 25, 2012.

The following additional documentation, submitted by HART to FTA and the consulting parties on April 20, 2012, in compliance with 36 CFR section 800.11 and consistent with the intent of National Register Bulletin (NRB) 38, is incorporated by reference:

- *Draft Report: Study to Identify the Presence of Previously Unidentified Traditional Cultural Properties in Sections 1-3 for the Honolulu Rail Transit Project, Management Summary, SRI Foundation & Kumu Pono Associates LLC, April 20, 2012.*

- *He Mo`olelo `Aina – Traditions and Storied Places in the District of `Ewa and Moanalua (in the District of Kona), Island of O`ahu. A Traditional Cultural Properties Study - Technical Report, Kumu Pono Associates LLC, April 20, 2012.*

With the submittal of this documentation, FTA and HART have fulfilled the following requirements of the Programmatic Agreement Stipulation II – TCPs for Sections 1-3 (East Kapolei to Middle Street Transit Center):

1. Undertake a study…to determine the presence of previously unidentified TCPs within the APE, which include cultural landscapes if present;

2. Meet with the State Historic Preservation Division (SHPD), consulting parties, and other parties with expertise, including Native Hawaiian Organizations to discuss and identify previously unidentified TCPs;

3. Evaluate these TCPs for NRHP eligibility in accordance with guidance in NRB 38; and

4. Complete effects assessments and determinations.

Each of these four PA Stipulation II requirements is discussed further as follows:

1. **Undertake study.** The documentation incorporated by reference above fulfills the requirement for HART to conduct additional studies on previously unidentified TCPs per Stipulation II of the PA (for Sections 1-3). This study provided additional evaluation of oral tradition through a focus on storied and sacred places that were not previously recorded.

   While the current documentation focuses on Native Hawaiian sacred and storied sites, prior studies that fulfilled the requirements of Section 106 and the HRTP's Final Environmental Impact Statement (FEIS) included a variety of cultures and resource types. These studies were performed for and incorporated in the FEIS process for purposes of identifying and evaluating the impact of the HRTP on historic properties (structures, archaeological resources and cultural/traditional cultural properties). Among other things, the previous studies addressed resources that met the definition of TCPs. The studies are available on the HRTP website.

   These prior studies identified historic properties deemed eligible for listing on the NRHP, in part, because of the role the properties play in a community's historically rooted beliefs, customs, and practices. These properties include, but are not limited to: Sumida Watercress Farm (associated with the history of wetland agriculture), Aiea Plantation Cemetery (associated with the plantation settlement pattern), the 1958 Kamaka Ukulele Building (associated with the development of ukulele music in Hawaiian culture), the Tong Fat building (a focal point for the

`A`ala neighborhood), and the 1963 Waipahu Stake of the Church of Jesus Christ of Latter Day Saints (associated with the Samoan community). Table 4-34 of the FEIS identifies these properties and notes their No Adverse Effect determinations. The four relevant technical reports are: (1) *Historic Resources Technical Report, Honolulu High-Capacity Transit Corridor Project, August 15, 2008*; (2) *Addendum 01 to the Historic Resources Technical Report, Honolulu High-Capacity Transit Corridor Project, June 7, 2010*; (3) *Cultural Resources Technical Report, Honolulu High-Capacity Transit Corridor Project, August 15, 2008;* and (4), *Addendum 01 to the Cultural Resources Technical Report, Honolulu High-Capacity Transit Corridor Project, May 22, 2009.*

In addition, many Native Hawaiian resources were previously considered in archaeological studies such as the *Draft Historic and Archaeological Technical Report, Honolulu High-Capacity Transit Corridor Project, September 1, 2006* and *the Archaeological Resources Technical Report, Honolulu High-Capacity Transit Corridor Project, August 15, 2008*. These reports considered the HRTP's potential to affect numerous taro fields or fish ponds, and other properties of religious and cultural significance to Native Hawaiian organizations.

2. **Meet with SHPD and Consulting Parties**. The following meetings focused on TCPs or included a significant discussion in their agenda:

   - February 12, 2011 Meeting (public and consulting parties invited to discuss TCPs);
   - June 23, 2011 Meeting (consulting parties invited to further discuss TCPs);
   - April 13, 2012 Quarterly PA Meeting (TCP presentation and update, including Honouliuli Ahupua`a finding of no historic properties affected);
   - May 4, 2012 Meeting (consulting parties invited to comment on documentation for Section 1-3 provided to them on April 20, 2012).

3. **Evaluate Eligibility**. The attached documentation results in the following eligibility findings:

   - Of the 50 named places identified (13 ahupua`a, 26 wahi pana, 1 leina a ka`ukane and 10 inoa`āina), the 13 ahupua`a were not studied further since they are the larger traditional land divisions for the island of O`ahu that provide the context for consideration of individual wahi pana. Nine wahi pana, 1 leina a ka`ukane and 5 inoa`āina were not evaluated because they were located outside the HRTP APE (as defined by the PA).
   - Of the remaining 22 named places within the APE, 20 were identified as not eligible to the NRHP (5 inoa`āina, 15 wahi pana,). The 5 inoa`āina lacked any story connecting the locations with historic people or events and established no link between story and place. The 15 wahi pana found not eligible do not retain sufficient integrity to provide the integral link between the tradition and the place, as discussed in NRB 15. All of these properties are described and considered in detail in the attached documentation.
   - Two resources (wahi pana) have been identified as NRHP eligible. These properties, described below, were identified as meeting conditions for eligibility under one or more National Register criteria and have sufficient integrity to convey the integral link between tradition and place.

These properties are:

- **Huewaipī** (site #28, TMK 98005009, 98005010, 98005011, 98005012, 98005013, 98005014, 98005015, 98005016, 98020054, 98020057, 98020058, 98020059, 98020060, 98020061, 98020063, 98020064, 98020065, 98020066, 98020067, 98020071).
  The site is a spring situated near Kauhihau and Nāpōhakuloloa, in the vicinity of the old government road. Huewaipī, also called Kawaipī, supplied people of this area with drinking water. The spring continues to feed Waiau wetlands in Waimalu which is currently used for subsistence farming and gardening, and was an historic taro field. The property is eligible under criterion A for its association with a traditional land use pattern of agriculture, with integrity of location and association. [This property is located mauka of the HRTP guideway/Kamehameha Highway and makai of the H-1 interstate interchange with Moanalua Road.]

- **Kuki` iahu (Kuki`i)** (site #31, TMK 98016031, 98016047, 98016051).
  In late 1794, a battle was fought here between the warriors of Kā`eokūlani and Kalanikūpule. Kā`eokūlani was killed in this battle. The dead were gathered and taken down to the shore at Pa`aiau and piled high (SRI 2012:46). This wahi pana is the location of a historically significant battle involving historically significant people. This site is currently the Pearlridge Center and Sumida Watercress farm. Kuki`iahu does not retain sufficient integrity to be a contributing element, but the watercress farm was previously determined to be NRHP eligible (see FEIS table 4-34, page 4-192). [This property is Koko Head and mauka of the HRTP Pearlridge Station.]

4. **Findings of Effect**. The HRTP would have no adverse effect on these two historic properties. One of these sites (#31) was previously identified in the FEIS/Section 106 process and its no adverse effect finding has not changed.

- **Huewaipī** (site #28). This site takes its significance from traditional agricultural practices in relationship to the springs and meets NRHP eligibility under criterion A, and retains its integrity of association and location. At this location, the HRTP will be constructed within the median of Kamehameha Highway with no direct impacts to the site. The site is currently surrounded by commercial and residential properties, utility lines and the highway, and the HRTP would have no adverse indirect impacts. For these reasons FTA has determined that the HRTP would have **No Adverse Effect** to Huewaipī.

- **Kuki`iahu (Kuki`i)** (site #31). This site is situated in the same area as the Sumida Watercress Farm, although the mapped boundaries of Kūki`iahu extend into the Uptown and Downtown portions of Pearlridge Mall. Sumida Watercress Farm has already been identified as eligible for nomination to the NRHP. Effects assessed through the Section 106 process associated with the HRTP FEIS support the determination of eligibility and finding of No Adverse Effect. This site meets NRHP eligibility criteria A and B, but the subsequent development of wetland agriculture and establishment of the watercress farm has eliminated all elements of Kuki`iahu. Therefore Kūki`iahu is a non-contributing element of the Sumida Watercress Farm's NRHP eligibility. The prior finding of **No Adverse Effect** for this site remains.

Mitigation

The study identified 37 wahi pana, leina a ka`ukane, and inoa`āina, two of which are determined to be NRHP eligible historic properties. Findings of **No Adverse Effect** pursuant to 36 CFR section 800.5 have been made. As a result, no mitigation or treatment measures are required under Section 106 or Stipulation II of the PA.

Educational Materials, Interpretation and Signage

Even though no mitigation or treatment measures are required under Section 106 or Stipulation II of the PA, HART is committed to exploring appropriate ways to share and tell these stories. This has been a common discussion topic with the consulting parties. The information gathered from all the research associated with the TCPs described in this letter will be used in conjunction with implementation of PA Stipulation VII. Educational Materials, Interpretation and Signage.

Conclusion

At this time FTA is requesting SHPD concurrence on two items: (1) the eligibility and effects findings described above and (2) that the requirements of Stipulation II of the PA outlined above and detailed in the attached documentation have been fulfilled with respect to construction Sections 1-3 (East Kapolei to Middle Street Transit Center).

FTA requests SHPD review and concurrence within 30 days of receipt of this letter. Early concurrence with the conclusion that there are no eligible properties (Sites 7 – 15, 17, and 18) in the APE for Section 1 (Honouliuli, Hoaeae, Waikele, Waipio and Waiawa Ahupuaas) would be greatly appreciated.

The determination of eligibility and finding of effect report will be circulated to the consulting parties during the 30-day SHPD review period. Any additional comments will be considered by FTA. In further compliance with Stipulation II of the PA, HART will complete NRHP nomination forms for the eligible properties identified in this letter. FTA and HART will continue to work with interested Native Hawaiian Organizations under Stipulation VII as noted above.

Should you have any questions, please contact Mr. Ted Matley at (415) 744-2590.

Sincerely,

Leslie T. Rogers
Regional Administrator

Attachment

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

WILLIAM J. AILA, JR.
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

GUY H. KAULUKUKUI
FIRST DEPUTY

WILLIAM TAM
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

Kakuhihewa Building
601 Kamokila Blvd. Room 555
Kapolei, HI 96706

July 3, 2012
Leslie T. Rogers
Regional Administrator
US Department of Transportation
Federal Transit Administration
201 Mission Street, Ste 1650
San Francisco, CA 94105-1839

LOG# 2012.1929
DOC#1207PA01

Dear Mr. Rogers:

RE: Determination of Eligibility and Finding of Effect for Previously Unidentified Traditional Cultural Properties in Sections 1-3
Ewa Moku, Island of Oahu
TMK (1) Various

Thank you for the opportunity to review the above referenced document. Based on information in *Moolelo Aina – Traditions and Storied Places in the District of Ewa and Moanalua (In the District of Kona), Island of Oahu. A Traditional Cultural Properties Study –Technical Report.* Kumu Pono Associates, LLA. April 20, 2012, on consultation with Native Hawaiians, and on the National Register Bulletin 38: *Guidelines for Evaluating and Documenting Traditional Cultural Properties* ((P.L Parker & T.F. King), FHWA has determined that the rail project will have **no adverse effect** on Traditional and Cultural properties eligible for the National Register in sections 1-3 of the proposed Honolulu Rapid Transit Corridor. **SHPD concurs** on the evaluation of significance for the 22 potential TCP sites evaluated, and for the no adverse effect on the two sites deemed eligible for the National Register (comments below). We question why the Leina Ka Uhane District was considered to be outside the APE, when a part of the Leina does cross the APE in Moanalua. Although all of the individual sites are outside of the APE, the path of the leina crosses the APE. We would appreciate your response to this question.

In keeping with the stipulations in *Programmatic Agreement among the U.S. Department of Transportation, Federal Transit Administration, the Hawaii State Historic Preservation Officer, the United States Navy, and the Advisory Council for Historic Preservation Regarding the Honolulu High-Capacity Transit Corridor Project In the City and County of Honolulu, Hawaii,* the Honolulu Authority for Rapid Transit (HART) undertook a traditional properties survey of the Transit Corridor. The study focused on Native Hawaiian Traditional Cultural Properties, as HART felt that other traditional cultural properties (Chinatown, Sumida Watercress Farm) has been adequately addressed in the Archaeology or Technical reports.

A total of 50 named places were identified. Land divisions, places without stories attached to them, and sites outside of the APE were dropped from the analysis, leaving a total of twenty-two (22) potential TCP sites along the rail corridor. Of these, only 2 were considered eligible for the register based mainly on integrity of location and association. SHPD would suggest that although many of the other sites do not retain integrity, or do not have enough history attached to them, it is possible that more information may be found about these sites. At that point their eligibility can be re-evaluated. The two eligible sites are Heuwaipi and Kuki'iahu. Huewaipi is a spring that feeds the Waiau wetlands in Waimalu. Historic maps indicate that this area was once a lo'i. It is still used for subsistence farming and gathering. Thus, it retains integrity of association to traditional farming and is eligible under criterion A.

Kuki'iahu is the name of the battle between Kaeokulani and Kalanikupule where Kaeokulani was killed. Kaeokulani was a ruling chief of Maui, Lanai and Molokai and originally from Kauai. Kalanikupule was a ruling chief of Oahu. Because of their high chiefly status and the role that they played in the history of Hawaii, the site is eligible under Criterion A and B. However, it has been impacted by Sumida Watercress Farm and Pearlridge Shopping Center and therefore does not retain integrity of association. Despite this, because the TCP overlaps with Sumida Watercress farm, which is already eligible as a TCP, FHWA felt that Kuki'iahu is a non-contributing element of the Sumida Watercress Farm site.

Neither site will be directly impacted by rail and thus no mitigation specific to either site is required. Archaeological monitoring will occur as a standard practice for the entire construction route. SHPD would like to congratulate HART on the extensive work and care that went in the Kumu Pono document. We know that it will be a useful tool for future researchers on the history of this area.

Please call me if you have further questions.

Sincerely,

Pua Aiu
Administrator

C: William Aila, Jr, Chair

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
POST OFFICE BOX 621
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HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

April 2, 2012

Kenneth Toru Hamayasu
Interim Executive Director and CEO
Honolulu Authority for Rapid Transportation
City and County of Honolulu
Alii Place Suite 1700
1099 Alakea Street
Honolulu, HI 96813

Dear Mr. Hamayasu:

RE: Section 106 Consultation (NHPA)
Request for Concurrence on a "no effect" determination for the Honolulu High Capacity Rail Project
Honouliuli, Ewa Moku, Oahu
TMK (1) 9-1-017:060-062; 9-1-019:001, 004-008, 013-015, 017-019, 023, 027, 029-031 (Po'ohilo TMK)

Thank you for your request for concurrence on a "no effect" determination for a possible TCP within the Honouliuli sector of the Honolulu High Capacity Rail project. We received the request by e-mail on March 20, with a request for expedited review. A second, more complete submittal was made on March 27, again, with a request to expedite. A third, revised request was submitted by e-mail on March 30, again, with a request to expedite. In support of your "no effect" determination you supplied the State Historic Preservation Office with the following materials:

a) a letter requesting concurrence with your "no effect" determination, dated March 30, 2012.
b) *Preliminary Draft Report: Study to Identify the presence of previously unidentified traditional cultural properties in sections 1-3 for the Honolulu High-Capacity Transit Corridor Project*, SRI Foundation and Kumu Pono Associates, March 26, 2012 (SRI and Kumu Pono Report)
c) *He Mo'olelo 'Aina—Traditiona and storied places in the District of 'Ewa and Moanalua (in the District of Kona), Ilsland of O'ahu: A Traditional Cultural Properties Study –Technical Report,* Kumu Pono Associates, LLC, January 20, 2012 (Kumu Pono report, Jan. 20, 2012)

Stipulation II of the PA requires the HART to:

1) Undertake a study . . . to determine the presence of previously unidentified TCPs within the APE, which includes cultural landscapes if present.
2) Prior to construction commencement . . . meet with . . .parties with expertise . . . to discuss and identify potential TCPs as defined by the National Register Bulletin 38.
3) Undertake studies to evaluate these TCPs for NRHP eligibility in accordance with guidance in Bulletin 38
4) The study shall be completed by qualified staff with experience in ethnographic studies and TCP assessments for NRHP eligibility.

Stipulations II also requires that "the City complete all fieldwork, eligibility and effect determination and consultation to develop treatment measures prior to the commencement of construction." SHPD is only able to respond at this time to a "no effect" determination for Phase I of the project, as no further effect determinations have been made.

The reports cited in b) & c) above are submitted as partial requirements for Stipulation II. HPD's overall comment is that there are many typos, specifically in the Kumu Pono technical report that should be corrected. Additionally, we note that Stipulation II does not limit Traditional Cultural Properties (TCPs) to Hawaiian TCPs. SHPD is concerned that for Phases II-IV there may be traditional cultural places of other cultures that are being missed.

Our comments below will be limited to Honouliuli rather than to a review of the whole report due to the request to expedite and to respond specifically to the request for concurrence regarding TCP's in Honouliuli. In general, however, if HART is going to request that we review specific pieces of the report, then it would be easier if the analysis were separated by ahupua'a. This would also allow a better analysis of how potential TCP in the Ahupua'a were determined.

Fifty-three (53) named places were noted in the Honouliuli Ahupuaa (Kumupono Associates, Jan 20, 2012). Of these, three (3) are located in the immediate vicinity of the rail project. Of the three named sites located in the APE of the rail, only one, Po'ohilo, has a story connected to it. Therefore, Po'ohilo is the only "wahi pana" or storied place forwarded for consideration as a potential TCP in the report by SRI and Kumu Pono (March 26, 2012).

Based on the report provided to SHPD, Po'ohilo is outside of the APE and will not be affected by the rail. The SHPO concurs with your determination of "no effect" to Po'ohilo based on the information provided.

For the record, the State Historic Preservation Division (SHPD) is unclear as to why Po'ohilo is considered a TCP eligible for the National Register (it may still be a TCP to Native Hawaiians). As defined in Bulletin 38 a TCP is "eligible for inclusion in the National Register because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history and (b) are important in maintaining the continuing cultural identity of the community." There is no analysis of Native Hawaiians relationship to Po'ohilo today, or that it was ever a site of more than passing significance after the Battle of Kipapa Gulch.

We do note, however, that one Native Hawaiian informant, Mr. Michael Lee, has stated that there is a water system that carries fresh water from the mauka portion of Honouliuli to the ocean, where he gathers limu. Limu gathering is a traditional cultural practice, and the shoreline along which Mr. Lee gathers limu at Oneula is potentially eligible as a TCP. It would be an adverse effect if the rail pillars affected the water sources for the limu at Oneula. However, as indicated in your letter for concurrence, geotechnical borings have indicated that only the East Kapolei station approach or penetrate into the coralline deposits. You do not indicate whether karst caverns or water was encountered, or whether your geologists have opined on this question in the Kapolei area.

We further note that Po'ohilo is not the only TCP in the Honouliuli District. The SRI and Kumu Pono Preliminary Draft Report (March 26, 2012) notes that there is a Leina District that runs from Honouliuli to Moanalua. The sites in Honouliuli are connected with Kanehili and Kaupe'a. Neither Kanehili nor Kaupe'a are located near rail, however the district boundary as drawn runs fairly close to the East Kapolei station. No further analysis of the Leina has been conducted in relationship to the Honouliuli Ahupua'a. We suggested that before construction begins on Phase II, or perhaps sooner, additional consultation regarding the Leina Ka 'Uhane district occur.

Conclusion

SHPD concurs with the determination of "no effect" to historic properties for Po'ohilo. As no effect determinations were requested for any other sites, SHPD has commented on the Leina Ka Uhane district and on comments from Mr. Michael Lee regarding the possibility of a karst system in the Kapolei area of the rail project.

Please call Pua Aiu at 692-8040 or contact her by e-mail at pua.aiu@hawaii.gov if you have further questions regarding this letter.

Sincerely,

William Aila, Jr.
State Historic Preservation Officer

U.S. Department
of Transportation
**Federal Transit
Administration**

REGION IX
Arizona, California,
Hawaii, Nevada, Guam
American Samoa,
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The Honorable William J. Aila, Jr.
Hawai`i State Historic Preservation Officer
Department of Land and Natural Resources
State of Hawaii
Kakuhihewa Building
601 Kamokila Boulevard, Suite 555
Kapolei, HI 96707

AUG 2 8 2013

Re: Determination of Eligibility and Finding of Effect for Previously Unidentified Traditional Cultural Properties in Section 4 of the Honolulu Rail Transit Project

Dear Mr. Aila:

In accordance with 36 C.F.R. Part 800 and pursuant to Stipulation II.A. of the Section 106 Programmatic Agreement (PA) for the Honolulu Rail Transit Project (HRTP), the Federal Transit Administration (FTA), in coordination with the Honolulu Authority for Rapid Transportation (HART), requests your concurrence with the following two determinations:

1) There are no wahi pana (storied and sacred places) within the area of potential effect (APE) for HRTP Section 4 that are eligible for the National Register of Historic Places (NRHP); and
2) The HRTP will not adversely affect any additional traditional cultural properties (TCP) for Section 4 that are eligible for the NRHP.

The study procedures, resulting reports and stakeholder coordination supporting FTA's determinations are discussed in more detail below.

I. TCP Study

Pursuant to Stipulation II.A. of the PA, HART undertook a study to determine the presence of previously unidentified TCP within the APE for Section 4 (TCP Study). The results of that study are discussed in *Determination of Eligibility and Finding of Effect for Previously Unidentified Traditional Cultural Properties in Section 4, Honolulu Rail Transit Project, July 11, 2013* (DOEFOE).

The study area for the TCP Study is depicted in Attachment 1 to the PA and also Figure 1 of the DOEFOE. The APE was established to capture the area within which the HRTP may directly or indirectly cause alterations in the character or use of historic properties

(36 C.F.R. § 800.16). To identify potential TCP, a wide variety of sources were consulted including existing literature, archival documents, historic maps and oral traditions. This effort and results of that effort are documented in the following reports:

> *Draft Study to Identify the Presence of Previously Unidentified Traditional Cultural Properties in Section 4 for the Honolulu Rail Transit Project, Draft Management Summary, The SRI Foundation and Kumu Pono Associates LLC, April 24, 2013*; and
>
> *Draft He Mo`olelo `Āina – Traditions and Storied Places in the District of Kona – Honolulu Region (Lands of Kalihi to Waikīkī), Island of O`ahu. A Traditional Cultural Properties Study - Technical Report, Kumu Pono Associates LLC Study No. 131, March 28, 2013.*

HART submitted drafts of these two reports to the consulting parties on April 24, 2013, in compliance with 36 C.F.R. § 800.11 and Stipulation II of the PA and consistent with the intent of National Register Bulletin (NRB) 38. Drafts of those two reports were also made available to the public on the project website (http://www.honolulutransit.org/planning/ii-traditional-cultural-properties.aspx). In addition to these reports, the DOEFOE provides evaluation of oral tradition focusing on storied and sacred sites in Section 4. When the process for the evaluating TCP for Section 4 is completed, the reports identified above will be finalized and again made available to the public.

II. Study Results

Ahupua'a are traditional, native Hawaiian land divisions that are part of a broader Hawaiian cultural landscape. Ahupua'a are shown in Figure 1 of the DOEFOE. The ahupua'a are not considered TCP, but do lend context to individual named places located within the ahupua'a. Those named places may be eligible for the NRHP as individual places or historic districts. It is within this context that the wahi pana were identified in or near the HRTP.

In addition, as discussed in Section 1.3 of the DOEFOE, if a wahi pana overlapped with an archaeological site, the wahi pana was evaluated for NRHP eligibility on its own merits. The NRHP eligibility of archaeological sites within the APE for Section 4 is being evaluated in a separate process, the HRTP Archaeological Inventory Survey. However, whether the stories associated with a wahi pana contributed to the historic significance of an archaeological site, or *vice versa*, was noted as it relates to the NRHP eligibility of the wahi pana.

The TCP Study documented 32 wahi pana in or related to sites within the APE for Section 4. Evaluation and consultation determined that eight of the 32 wahi pana were neither physically nor tangibly related to sites within the APE for Section 4, leaving 24 wahi pana that were within the APE for Section 4. The NRHP eligibility for the 24 wahi pana in the APE is summarized below and is presented in Table 1 of the DOEFOE.

Each of the 24 wahi pana within the APE for Section 4 is associated with one or more themes, which are discussed in the accompanying reports. Twenty-two of those wahi pana are associated with notable events and individuals in Hawaiian history. Thirteen are associated with places of ceremonial importance, tribute sites or places associated with the dead and spirit world. Places where the gods and demigods walked the land are captured in 10 wahi pana.

Other themes represented are places of traditional resource management and trails and boundary markers. Therefore, the wahi pana meet NRHP eligibility criteria A and/or B.

NRHP eligibility is based on eligibility criteria set forth in 36 C.F.R. § 60.4 and integrity, which is defined in NRB 15. The area in the vicinity of each wahi pana is completely developed and surrounded by 20th century Honolulu, including residences, businesses and offices. The degree of development in Section 4 has altered the landscape and setting of the wahi pana to such an extent that they no longer retain sufficient integrity of association, feeling or setting to be eligible for the NRHP.

None of the 24 wahi pana located within the APE for Section 4 have been determined to be TCP that are eligible for the NRHP. As a result, the HRTP will not adversely affect any additional TCP in Section 4 that are eligible for the NRHP. Accordingly, no mitigation or treatment measures are required under Section 106 or Stipulation II of the PA. This finding does not alter previous findings of effect for the HRTP.

Even though no mitigation or treatment measures are required under Section 106 or Stipulation II of the PA, HART and FTA are committed to exploring appropriate ways to share and tell the stories connected to wahi pana. The need to share and tell those stories has been the subject of recurring comments from consulting parties. To achieve this goal, the information gained from the TCP Study will be used in conjunction with implementation of Stipulation VII of the PA (Educational and Interpretive Programs, Materials, and Signage).

III. Coordination with the State Historic Preservation Division (SHPD) and Other Parties

HART and FTA have coordinated with SHPD, Consulting Parties and other stakeholders regarding the efforts to study previously unidentified TCP. The following meetings focused on TCP or included a significant discussion in their agenda:

- February 12, 2011 Meeting (Public and Consulting Parties invited to discuss TCPs)
- June 23, 2011 Meeting (Consulting Parties invited to further discuss TCPs)
- April 13, 2012 Quarterly PA Meeting (TCP presentation and update)
- May 8 and 9, 2013 Meetings (Consulting Parties invited to comment on documentation for Section 4 provided to them on April 24, 2013)

In addition to these meetings, HART and FTA held quarterly meetings regarding the PA, to which all Consulting Parties were invited. The April 13, 2012 quarterly meeting included a presentation and discussion on efforts to study TCP in compliance with Stipulation II of the PA. Summaries of all four meetings are included in Chapter 4 of the DOEFOE and are available on the HRTP website at http://www.honolulutransit.org. The Consulting Parties' comments on the TCP Study for Section 4 were incorporated into the DOEFOE. The DOEFOE will be circulated to the Consulting Parties during the SHPD review period. FTA and HART will continue to work with interested native Hawaiian organizations pursuant to the PA and during the course of the HRTP.

IV. Conclusion and Determination

FTA requests SHPD's concurrence on the following two determinations: (1) there are no wahi pana (storied and sacred places) within the APE for Section 4 that are eligible for the NRHP and, therefore, (2) the HRTP will not adversely affect any additional traditional cultural properties (TCP) in Section 4 that are eligible for the NRHP. FTA requests SHPD review and concurrence within 30 days of receipt of this letter per Stipulation II.A. of the PA.

Should you have any questions, please contact Mr. Ted Matley, Community Planner, at (415) 744-2590.

Sincerely,

Leslie T. Rogers
Regional Administrator

Enclosures

- *Determination of Eligibility and Finding of Effect for Previously Unidentified Traditional Cultural Properties in Section 4, Honolulu Rail Transit Project, July 11, 2013.*
- *Draft Study to Identify the Presence of Previously Unidentified Traditional Cultural Properties in Section 4 for the Honolulu Rail Transit Project, Draft Management Summary, The SRI Foundation and Kumu Pono Associates LLC, April 24, 2013.*
- *Draft He Mo`olelo `Āina – Traditions and Storied Places in the District of Kona – Honolulu Region (Lands of Kalihi to Waikīkī), Island of O`ahu. A Traditional Cultural Properties Study - Technical Report (Draft), Kumu Pono Associates LLC Study No. 131, March 28, 2013.*

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NEIL ABERCROMBIE
GOVERNOR OF HAWAII

WILLIAM J. AILA, JR.
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CONSERVATION AND RESOURCES ENFORCEMENT
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FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
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August 26, 2013

Mr. Matt McDermott
Principle Investigator
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mmcdermott@culturalsurveys.com

LOG NO: 2013.2279, 2013.4326
DOC NO: 1308SL20
Archaeology

Dear Mr. McDermott:

SUBJECT: **Chapter 6E-8 and National Historic Preservation Act (NHPA) Section 106 Review – Archaeological Inventory Survey for the Airport Phase (Construction Phase 3) of the Honolulu High-Capacity Transit Corridor Project**
Hālawa and Moanalua Ahupua'a, 'Ewa and Honolulu Districts, O'ahu Island
TMK: (1) 1-1 and 9-9 (Various Plats and Parcels)

Thank you for the opportunity to review this report titled *Archaeological Inventory Survey for the Airport Section (Construction Section 3) of the Honolulu High-Capacity Transit Corridor Project Hālawa and Moanalua Ahupua'a, 'Ewa and Honolulu Districts, O'ahu Island TMK Sections [1] 1-1 and 9-9 (Various Plats and Parcels)* (Hammatt et al., August 2013). We received the initial draft on March 4, 2013 and provided initial comments on March 29, 2013 (Log No. 2013.2279, Doc. No. 1303SL24).

The Honolulu High-Capacity Transit Corridor Project (HHCTCP or project) includes the use of federal funds and involves lands under several jurisdictions, including Federal, State, City and County of Honolulu, and private. Pursuant to 36 CFR §800.3(a), the proposed project constitutes an undertaking subject to review under Section 106. The project was determined to have an adverse effect on historic properties. A Programmatic Agreement (PA) stipulating mitigation commitments was executed on January 18, 2011 with the Federal Transit Administration (FTA), the Hawaii State Historic Preservation Officer (SHPO), the U.S. Navy, and the Advisory Council on Historic Preservation (ACHP) as signatories, and the City and County of Honolulu (C&C Honolulu) as an invited signatory. The Area of Potential effect for archaeology is defined in the PA as all areas of direct ground disturbance, including utilities. An archaeological inventory survey following HAR Chapter 13-276 was stipulated as a mitigation commitment in the PA.

The Airport Phase 3 archaeological inventory survey (AIS) area is from Kalaloa Drive Station 994+00 in the West to the Middle Street Station (Station 1248+00), a distance of 7.74 kilometers (4.8 miles). The Airport AIS area of potential effect (APE) comprises about 9.06 acres of direct ground disturbance, including three stations. An archaeological inventory survey plan (AISP) was prepared by Cultural Surveys Hawaii, Inc. (Hammatt and Shideler 2011). The AISP was reviewed and accepted by SHPD on December 2, 2011 (Log No. 2011.2167, Doc. No. 1211NN01). An Addendum AISP was subsequently prepared to address a possible alternative site (Alternative A) for the Honolulu International Airport Station (Hammatt and Shideler, 2013). It was reviewed and accepted by SHPD on March 1, 2013 (Log No. 2013.1957, Doc. No. 1302SL29).

The AIS involved a 100 percent surface survey of a heavily developed urban corridor which yielded no surface archaeological cultural resources (historic properties). Subsurface testing involved 47 trench test excavations, of which 40 were proposed in the AISP. The additional 7 were included to address the proposed Alternative A location for the Honolulu Airport Station. The proposed and final locations of some of the trench test excavations differ

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NEIL ABERCROMBIE
GOVERNOR OF HAWAII

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

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KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

September 27, 2013

Leslie T. Rogers
Regional Administrator
US Department of Transportation
Federal Transit Administration
201 Mission Street, Ste 1650
San Francisco, CA 94105-1639

Log No.: 2013.5117 A
Doc No. 1309PA04

Dear Mr. Rogers:

RE: NHPA Review, Section 106 Review of Stipulation II.A
Honolulu High-Capacity Transit Corridor Project Programmatic Agreement
Determinations of Effect for Traditional Cultural Properties, City Center
Kapalama, Kalihi, Kapalama, Nu'uanu, Pauoa, Waikiki and Manoa Ahupua'a
Kona Moku, Island of Oahu
TMK: (1) 1-5, 1-7, 2-1,2-2,2-3, 2-6 (various plats and parcels)

Thank you for your request for concurrence on the Federal Transit Administration's determination that 1) there are no eligible Traditional Cultural Properties within the transit corridor, and 2) the Honolulu High Capacity Transit Corridor Project (HHCTCP) will have "no adverse effect" on National Register eligible traditional cultural properties within the HHCTCP city center corridor. Your letter was received at the SHPD office on August 29, 2013. SHPD responded on September 25, 2013 and asked for additional information and revisions. During that time my office has also been consulting with the HART office on the request for additional information, as well as suggested changes to the Determination of Eligibility, Finding of Effect for Previously Unidentified Traditional Cultural Properties in Section 4, Honolulu Rail Transit Project (HART, July 11, 2013 (DOE/FOE). We have received an updated version of this document in electronic format today (9/27/13) which incorporates all of our requested changes. This letter is based on the electronic version we received today. We look forward to receiving the revised hard copy for our records.

The TCP study is composed of two documents:

1. He Mo'olelo 'Aina-Traditions and storied places in the district of Kona – Honolulu Region (Lands of Kalihi to Waikiki), Island of O'ahu. Traditional Cultural Properties Study –Technical Report. (Kumu Pono Associates, March 2013). (Kumu Pono, 2013)
2. Study to Identify the Presence of Previously Unidentified Traditional Cultural Properties in Section 4 for the Honolulu Rail Transit Project. Draft Management Summary (SRI Foundation and Kumu Pono Associates, April 2013). (SRI, April 2013)

The first document did archival and oral history research on named places within a broadly defined area that could potentially be affected by the HHCTCP. One-hundred and eighty (180) named places were identified in this study. Of those 180, one-hundred and five (105) were originally found to be within the APE or linked to the APE.

The second study, the Draft Management Study, further filtered these 105 sites by a) associating them with 5 thematic contexts, and eliminating those that had no story or actual practices associated with them. A total of 32 sites were left.

The DOE/FOE then evaluated these 32 sites for National Register Eligibility. Eight (8) of these 32 sites were found to be outside of the APE, leaving 24 potential traditional cultural properties to be evaluated. All twenty-four properties were found to meet at least one of the eligibility criteria, however, none of them were found to retain enough integrity of condition to be eligible for the National Register. Oral interviews and meetings with cultural descendants did not add any information regarding integrity of relationship.

SHPD **concurs** with the Federal Transportation Administration's determination that there are **no eligible Traditional Cultural Properties** within in the HHCTCP APA, and therefore the project will **have "no adverse effect"** to historic properties

Sincerely,

William Aila, Jr.
State Historic Preservation Officer

cc: Dan Grabauskas, HART
Jason Bright, HART
Susan Lebo, SHPD

slightly, reflecting decision changes required to address impediments (e.g., utility line locations) and/or safety issues.

Two cultural resources or historic properties were identified. They consist of Site 50-80-13-7420 (buried asphalt roadway) and Site 50-80-13-7421 (buried concrete slabs, coral pavement, and base course sections related to ca. 1942-1943 military infrastructure). Both sites are assessed as National- and Hawaii- Register eligible under Criterion D (information content). The determination for the entire project is an "adverse effect" on historic properties under 36 CFR 800 and "effect with proposed mitigation commitments" under HAR §13-275-7(2). Thus, mitigation recommendations were provided. The recommended mitigation measure identified for this undertaking involves an archaeological monitoring program.

We confirm that the archaeological inventory survey was conducted in accordance with the AISP and Addendum AISP. We provided initial comments on the draft archaeological inventory survey report (Log No. 2013.2279; Doc. No. 1303SL24). This initial, and all subsequent comments, because of their extensive nature were provided directly on the text pages of the report as well as through in-person reviews of specific areas with Cultural Surveys Hawai'i staff.

We concur that Sites 50-80-13-7429 (buried asphalt roadway) and 50-80-17-7421 (buried infrastructure) are significant under National- and Hawaii-Registers of Historic Places Criterion D only, chiefly for their information potential. We also concur with the proposed mitigation recommendation of on-call monitoring as both sites are discontinuous and fragmentary in their extent.

In addition, SHPD received 98 comments from 13 individuals or organizations regarding the Archaeological Inventory Survey (AIS) for the entire HHCTCP corridor. Thirteen of these comments were pertinent to the Airport Phase 3 Section of the HHCTCP AIS. Eleven comments requested additional testing in column locations and utilities and four expressed concern that the AIS overall was premature or not well done in general. SHPD has taken these comments into account and believes, based on background research and previous archaeological studies and the limitations on the ground (i.e. existing utilities), that the Airport Section 3 project corridor has been adequately surveyed. We believe on-call archaeological monitoring will adequately address the inadvertent discovery of historic properties, if any are found.

This revised archaeological inventory survey report meets the minimum requirements specified in the *Secretary of the Interior's Standards for Archeological Documentation* and the requirements set forth in HAR §13-275and HAR §13-276. It is accepted by SHPD. Please send one hardcopy of the document, clearly marked FINAL, along with a copy of this review letter and a text-searchable PDF version of the report on CD to the Kapolei SHPD office. Please contact Dr. Susan A Lebo at (808) 692-8019 or at Susan.A.Lebo@hawaii.gov if you have any questions regarding this letter.

Aloha,

William J. Aila, Jr.
State Historic Preservation Officer

NEIL ABERCROMBIE
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CONSERVATION AND RESOURCES ENFORCEMENT
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August 26, 2013

Mr. Matt McDermott
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LOG NO: 2013.2564, 2013.4338
DOC NO: 1308SL21
Archaeology

Dear Mr. McDermott:

SUBJECT: **Chapter 6E-8 and National Historic Preservation Act (NHPA) Section 106 Review—Revised Archaeological Inventory Survey Report for City Center (Construction Phase 4) Honolulu High-Capacity Transit Corridor Project Kalihi, Kapālama, and Honolulu Ahupua'a, Honolulu District, Island of O'ahu TMK: (1) 1-2, 1-5, 1-7, 2-1, 2-3, Various Plats and Parcels**

Thank you for the opportunity to review this report titled *Archaeological Inventory Survey Report (AISR) for Construction Phase 4 of the Honolulu High-Capacity Transit Corridor Project, Kalihi, Kapālama, and Honolulu Ahupua'a, Honolulu District, O'ahu Island TMK Sections [1] 1-2, 1-5, 1-7, 2-1, 2-3 (Various Plats and Parcels)* (Hammatt et al., June 2013), which our office received on July 15, 2013. We received the initial draft on April 9, 2013. Due to the size and complexity of this review all comments have been provided directly on text pages of the report as well as through in-person reviews of specific areas with Cultural Surveys Hawaii staff.

The Honolulu High-Capacity Transit Corridor Project (HHCTCP or project) includes the use of federal funds and involves lands under several jurisdictions, including Federal, State, City and County of Honolulu, and private. Pursuant to 36 CFR 800.3(a), the proposed project constitutes an undertaking subject to review under Section 106. The project was determined to have an adverse effect on historic properties within the transit corridor and a Programmatic Agreement (PA) was executed on January 18, 2011 between the Federal Transit Administration (FTA), the Hawaii State Historic Preservation Officer (SHPO), the US Navy and the Advisory Council on Historic Preservation as signatories and the City and County of Honolulu as an invited Signatory. An archaeological inventory survey for the four phases of the project under HAR §13-276 is stipulated as a mitigation measure in the PA.

The Area of Potential Effect (APE) for archaeology is defined in the PA as all areas of direct ground disturbance. Thus, for the City Center the area of direct ground disturbance is approximately 13.9 acres, including nine (9) stations. The survey study area is the eastern-most 4.3 miles (6.9 km) of the overall HHCTCP area, extending from Kalihi Stream/Middle Street Station in the west to Ala Moana Center in the east. An archaeological inventory survey plan (AISP) was prepared by Cultural Surveys Hawai'i, Inc. (Hammatt et al. 2011). The AISP was reviewed and accepted by SHPD on October 25, 2011 (Log No. 2011.2379, Doc. No. 1110NN08). An Addendum AISP was completed to address the relocation of the City Center's Kaka'ako Station footprint and corridor beginning about 30 meters 'Ewa (northwest) of Ward Avenue and rejoining the original alignment in the middle of Queen Street about 100 meters Diamond Head (southeast) of Kamake'e Street. The Addendum AISP was accepted by SHPD on March 1, 2013 (Log No. 2013.1958, Doc. No. 1302SL28).

The AIS involved a 100 percent surface survey of a heavily developed urban corridor which yielded no surface archaeological cultural resources (historic properties). Subsurface testing involved 250 test trench excavations. Two-hundred and thirty-two (232) trenches were proposed in the AISP, nine (9) were abandoned due to utility conflicts, safety issues or realignment/redesign, and twenty-seven (27) trenches were added to replace abandoned trenches or at the request of SHPD. The additional trenches were included to ensure that entire column locations were tested, alternative column or utility locations were tested, or to ensure the extent of sand deposits and the absence of burials in those sand deposits. The proposed and final locations of some of the trenches differ slightly, reflecting changes required to address impediments (e.g. utility line locations) and/or safety issues.

Nineteen (19) historic resources were identified within, or immediately adjacent to the Construction Phase 4 AIS survey area. Twelve (12) of these resources were previously identified and documented. Seven (7) resources were newly identified in this survey. All 19 historic resources have been assigned Hawai'i State Inventory of Historic Properties (SIHP) numbers, all with the prefix 50-80-14. The historic resources, associated test excavation numbers, descriptions, Hawai'i and/or National Register-eligibility, and mitigation recommendations are listed in the table below. Bold SIHP numbers represent the seven (7) historic properties newly identified during the Construction Phase 4 AIS. Numbers not in bold represent the twelve (12) historic properties in the Rail Corridor found during previous studies.

SIHP#	**Construction Phase 4 Test Excavation #**	**Description/Formal Type**	**Significance/Eligibility**		**Mitigation**
			HAR §13-276-6 Criterion	**National Register**	
50-80-14-7425	T-020	Subsurface *imu* (earth oven) feature	Recommend: D	Recommend: D	Monitoring
50-80-14-7426	T-054 through T-082, and 085	Subsurface wetland deposit	Recommend: D	Recommend: D	Monitoring
50-80-14-7506	T-064, T-066 and T-067	Subsurface incinerated trash deposit	Recommend: D	Recommend: D	Monitoring
50-80-14-5368	T-088, 091, 092, 093, and 094	Subsurface remnants of Kūwili Fishpond	Recommend: D	Recommend: D	Monitoring
50 80-14-5966	T-095	Subsurface remnants of Kawa Fishpond	Recommend: D	Recommend: D	Data Recovery, Monitoring
50-80-14-7427	T-096 through T-101 and test bores C-1-C-6	Subsurface historic building foundations and walls and underlying culturally enriched sediments, also one human talus bone in a fill deposit	Recommend: D, E	Recommend: D	Monitoring, Data Recovery, and Burial Treatment Plan
50-80-14-7428	T-119, 119A, 120, 120A, 120B	Subsurface culturally-enriched sand A-horizon (T-120, T-120A, and T-120B) and historic warehouse foundation (T-119 and T-119A)	Recommend: D	Recommend: D	Data Recovery and monitoring of sand A-horizon (T-120, 120A, and 120B), monitoring for historic foundation (T-119 and 119A)
50-80-14-2963	T-122, 123, and 124	Subsurface pond sediments containing historic artifacts, culturally-enriched sand A-horizon, also includes 7 human burials as described in the adjacent Makai Parking Garage monitoring report.	Recommend: D, E	Recommend: D	Monitoring for pond sediments, data recovery and monitoring for culturally-enriched sand A-horizon
50-80-14-7124	T-132	Subsurface historic building remnants	Previous: A, D Recommend: D	Recommend: D	Monitoring
50-80-14-7189	T-130, 132, 134, 138, 140, 231A, 232, and 232A	Subsurface fill layer containing burnt historic trash from open burning	Previous: A, D Recommend: D	Recommend: D	Monitoring

SIHP#	Construction Phase 4 Test Excavation #	Description/Formal Type	Significance/Eligibility		Mitigation
			HAR §13-276-6 Criterion	National Register	
50-80-14-7190	T-229 and 230	Subsurface salt pan remnants	Previous: A, D Recommend: D	Recommend: D	Data Recovery, Monitoring
50-80-14-7197	Not observed (see mitigation)	Subsurface culturally–enriched sand A-horizon	Previous: A, D and D Recommend: D	Recommend: D	Monitoring; Not observed in current AIS (see mitigation), but potentially affected by project construction due to close proximity
50-80-14- 5820	T-141, 142, 145, 146A, 150, 151, 151A	Human skeletal remains/burials and subsurface culturally enriched sand A-horizon	Recommend: D, E	Recommend: D	Data Recovery, Monitoring, Burial Treatment Plan
50-80-14-7429	T-167, 168, 168A, 168B, 169, 170, and 170A	Subsurface culturally-enriched sand A-horizon and human cranial Fragment in T-170	Recommend: D, E	Recommend: D	Data Recovery, Monitoring, Burial Treatment Plan
50-80-14-6856	T-181-185	Subsurface remnants of Kolowalu Fishpond	Recommend: D	Recommend: D	Monitoring
50-80-14-6636	T-186-193, 195, 196, 198-200, 202, 202A, 203, 205, 207, 208, 210-212, 214, 219, and 220	Subsurface remnants of the former Kewalo wetland	Previous: A, D Recommend: D	Recommend: D	Monitoring
50-80-14-7430	T-202	Subsurface remnant of a historic privy	Recommend: D	Recommend: D	Monitoring
50-80-14-7193	T-214	Subsurface historic refuse-enriched fill deposit	Ineligible	Ineligible	NA
50-80-14-2918	T-226A, B, C, and D, T-227 and 227A	Subsurface culturally-enriched sand A-horizon with human skeletal remains/burials, also includes iron historic trolley or cart tracks	Recommend: D, E	Recommend: D	Data Recovery, Monitoring, Burial Treatment Plan

We concur with the eligibility recommendations of the 19 sites in the above table, including the ineligible SIHP# 50-80-14-7193 determination. The 18 remaining sites are significant under National Register of Historic Places and Hawaii Register of Historic Places recommended criteria listed in the table. The overall effect of the undertaking has been previously determined to be "adverse" under 36 CFR part 800, as discussed above. The project effect under the provisions of HAR §13-275-7(2) is determined to be "effect with proposed mitigation." We concur with the proposed mitigation measures, which include on-site archaeological monitoring of any land alteration activities in the vicinity of the site areas and data recovery and burial treatment as identified above.

We confirm that the archaeological inventory survey was conducted in accordance with the AISP and Addendum AISP. As mentioned above, all comments to this AIS were done directly on the report and in face-to-face meetings with staff from Cultural Surveys Hawai'i, Inc.

In addition, SHPD received comments from 13 individuals and organizations with a total of 98 comments related to Archaeological Inventory Survey for the entire Rail Corridor. Fifty-seven comments (57) were specific to the City Center portion of the project. Forty-nine (49) of those comments requested additional testing related to column locations, utilities, the limited nature of geotechnical core testing or testing that had been stopped due to water inundation. SHPD has considered all comments received and believes that an adequate inventory survey has been completed. Data recovery will be conducted on eight historic sites as mitigation. SHPD notes that burials found during data recovery are considered previously identified and the decision to preserve them in place or relocate them will be the purview of the O'ahu Island Burial Council. HART has agreed that no construction will take place within 25 feet of any burials prior to SHPD's acceptance of a burial treatment plan.

This revised archaeological inventory survey report meets the minimum requirements specified in the *Secretary of the Interior's Standards for Archeological Documentation* and the requirements set forth in HAR §13-275 and HAR §13-276. It is accepted by SHPD. Please send one hardcopy of the document, clearly marked FINAL, along with a copy of this review letter and a text-searchable PDF version of the report on CD to the Kapolei SHPD office. Please contact Dr. Susan A Lebo at (808) 692-8019 or at Susan.A.Lebo@hawaii.gov if you have any questions regarding this letter.

Aloha,

William J. Aila, Jr.
State Historic Preservation Officer

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

WILLIAM J. AILA, JR.
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
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LAND
STATE PARKS

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

HISTORIC PRESERVATION DIVISION
KAKUHIHEWA BUILDING
601 KAMOKILA BLVD STE 555
KAPOLEI HI 96707

August 27, 2013

Matt McDermott
Principal Investigator
Cultural Surveys Hawaii
P.O. Box 1114
Kailua, HI 96734

Log No. 2013.4527
Doc. No. 1308SL22

Dear Mr. McDermott:

Subject: **Chapter 6E-8 and National Historic Preservation Act (NHPA) Section 106 Review—Supplemental Archaeological Inventory Survey for Phase 2 of the Honolulu High-Capacity Transit Corridor Project, Proposed Pearlridge Station Waimalu Ahupua'a, 'Ewa District, Island of O'ahu TMK: (1) 9-8-009:017 and 9-8-010:002**

Thank you for the opportunity to review this report titled *Supplemental Archaeological Inventory Survey for Section 2 of the Honolulu High-Capacity Transit Corridor Project, Proposed Pearlridge Station, Waimalu Ahupua'a, 'Ewa District, Island of O'ahu. TMK: (1) 9-8-009:017 and (1) 9-8-010:002* (Sroat, Matsushima & McDermott, August 2013), which our office received on July 25, 2013.

The Honolulu High-Capacity Transit Corridor Project (HHCTCP or project) includes the use of federal funds and involves lands under several jurisdictions, including Federal, State, City and County of Honolulu, and private. Pursuant to 36 CFR 800.3(a), the proposed project constitutes an undertaking subject to review under Section 106. The project as a whole was determined to have an adverse effect on historic properties. A Programmatic Agreement (PA) was executed on January 18, 2011 between the Federal Transit Administration (FTA), the Hawaii State Historic Preservation Officer (SHPO), the US Navy and the Advisory Council on Historic Preservation as signatories and the City and County of Honolulu as an invited Signatory. An archaeological inventory survey for the four phases of the project under HAR chapter 276 is stipulated as a mitigation measure in the PA.

The Area of Potential Effect (APE) for archaeology is defined in the PA as all areas of direct ground disturbance. Thus, for the Supplemental AIS for Phase 2 the area of direct ground disturbance is approximately .2 acres, which is the area of the Pearlridge Station. An archaeological inventory survey plan (AISP) for Phase 2 was prepared by Cultural Surveys Hawaii, Inc. (Hammatt 2010b). The AISP was reviewed and accepted by SHPD on May 7, 2010 (Log No. 2010.1748, Doc. No. 1005NM14). The three test trenches in this supplemental AIS were included in the original AISP, but could not be done at the time because the landowner would not allow access. We confirm that the supplemental archaeological inventory survey was conducted in accordance with the Phase 2 AISP.

Three test trenches were excavated to provide more information on the subsurface nature of the Pearlridge Station, to identify and document any archaeological historic resources encountered and to make eligibility recommendations for the Hawaii and National Registers of Historic Places. No historic resources were found during this supplemental archaeological inventory survey. However, the determination for the entire project is an "adverse effect" on historic properties under 36 CFR 800 and "effect with proposed mitigation commitments" under HAR §13-275-7(2). Thus, mitigation recommendations were provided. SHPD concurs with the proposed mitigation of a combination of on-call and full-time on-site archaeological monitoring as previously agreed to in the SHPD's acceptance of the AIS for Phase 2 (Log No. 2010.1749, Doc. No. 1004MV01).

The 30 day comment period for the project started on July 25, 2013 and ended on August 26, 2013. SHPD received no comments.

This revised archaeological inventory survey report meets the minimum requirements specified in the *Secretary of the Interior's Standards for Archeological Documentation* and the requirements set forth in HAR §13-275 and HAR §13-276. It is accepted by SHPD. Please send one hardcopy of the document, clearly marked FINAL, along with a copy of this review letter and a text-searchable PDF version of the report on CD to the Kapolei SHPD office. Please contact Dr. Susan A Lebo at (808) 692-8019 or at Susan.A.Lebo@hawaii.gov if you have any questions regarding this letter.

Aloha,

William J. Aila, Jr.
State Historic Preservation Officer

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STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

HISTORIC PRESERVATION DIVISION
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August 27, 2013

Mr. Dan Grabauskas
Executive Director and CEO
Honolulu Authority for Rapid Transit
City and County of Honolulu
1099 Alakea Street, 17th Floor
Honolulu, HI 96813

LOG NO.: 2013.4987
DOC. NO.: 1308SL23

Dear Mr. Grabauskas:

Subject: **Chapter 6E-8 and National Historic Preservation Act (NHPA) Section 106 Review—Archaeological Inventory Survey Report for the Honolulu High-Capacity Transit Corridor Project, West Kapolei to Ala Moana Center**
Honouliuli, Ho'ae'ae, Waikele, Waipi'o, Waiawa Manana, Waimano, Waiau, Waimalu, Kalauao, 'Aiea, and Halawa Ahupua'a, 'Ewa District and Moanalua, Kalihi, Kapālama, Honolulu, and Waikīkī Ahupua'a, Honolulu (Kona) District, Island of O'ahu
TMK: (1) 1-1, 1-2, 1-5, 1-7, 2-1, 2-3, 9-1, 9-4, 9-6, 9-7, 9-8, and 9-9 (Various Plats and Parcels)

SHPD has received, reviewed, and hereby accepts the archaeological inventory survey reports for the Honolulu High-Capacity Transit Corridor Project (HHCTCP or project), including all phases of the project. The reports are collectively referred to herein as "the AIS." Supportive documentation is provided in four appendices (A–D).

The Honolulu High-Capacity Transit Corridor Project (HHCTCP) includes the use of federal funds and involves lands under several jurisdictions, including Federal, State, City and County of Honolulu, and private. Pursuant to 36 CFR 800.3(a), the proposed project constitutes an undertaking subject to review under Section 106. The project was determined to have an adverse effect on historic properties within the transit corridor and a Programmatic Agreement was executed on January 18, 2011 between the Federal Transit Administration (FTA), the Hawaii State Historic Preservation Officer (SHPO), the US Navy and the Advisory Council on Historic Preservation as signatories and the City and County of Honolulu as an invited Signatory. An archaeological inventory survey for the four phases of the project under HAR Chapter 13-276 is stipulated as a mitigation measure in the PA. The PA also stipulates that archaeological fieldwork would be done in advance of the completion of final design and approved by SHPD. The terms of the Programmatic Agreement also stipulate that the Area of Potential Effect (APE) for archaeological resources is all areas of direct ground disturbance.

The area of direct ground disturbance for the entire 23 mile corridor is approximately 113 acres, and the survey study area is the 23 mile corridor. A total of 423 test trenches were excavated for this AIS. A list of accepted reports, dates of acceptance, SHPD log and document numbers, the APE and survey areas, and historic properties and mitigation is included as Appendix A to this letter. An Archaeological Inventory Survey Plan was accepted for each of the project's four phases, and Addendum Archaeological Survey Plans were accepted for Phases 3 and 4. All plans are collectively referred to as "AISP."

Archaeological Inventory Survey Reports were accepted for each of the project's four phases and a Supplemental Archaeological Inventory Survey Report was accepted for Phase 2. SHPD acceptance letters are attached to this letter as Appendix D. We confirm that the archaeological inventory surveys for all phases were conducted in accordance with the AISP for the corresponding phase of the project.

A total of 21 historic properties were found throughout the corridor. Two additional historic properties have the potential to be affected but were not relocated (SIHP Sites 7197 and 5966). Appendix B lists all of the historic properties that are potentially affected by this project. SHPD has concurred with the proposed significance determinations as listed in Appendix B. SHPD also concurs with the proposed effect determination, which is an "adverse effect" on historic properties under 36 CFR 800(5) and "effect with proposed mitigation commitments" under HAR §13-275-7(2). Thus, mitigation recommendations were provided and are listed in Appendix B. SHPD concurs with the mitigation proposals as listed.

In addition, SHPD received comments from 13 individuals with a total of 98 comments related to archaeological inventory survey for the entire Rail Corridor. The majority of the comments requested more test trenches in column locations, station locations and utility relocation corridors. Several of the comments requested more testing in areas that had been abandoned due to meeting the water table or due to unstable soil. Fifty-seven comments were about Phase 4, with 49 of those comments requesting more testing. A total of 38 comments addressed the first three phases of rail, with most requesting additional testing. Thirteen comments addressed underground karst caves and water systems and their relation to cultural practices at shore.

SHPD reviewed and considered all of the comments and believes that adequate testing has been done for this project. Several of the comments related to sites outside of the project corridor. Data recovery is the mitigation proposed for a total of nine sites, eight (8) in the City Center phase and one (1) within the Waipahu Transit Center Station footprint (Site 7751). Data recovery fieldwork is complete at Site 7751 and an Interim Protection Plan (IPP) pursuant to HAR§13-275-9(d) is being prepared for the eight (8) sites in the City Center. SHPD notes that any burials found during data recovery are considered previously known and the determination to remain in place or relocate those *iwi* will be the purview of the O'ahu Island Burial Council. A table listing all of the comments and responses will be posted on the HART website in September.

The AIS for the project, including the entire rail corridor, meets the requirements specified in the *Secretary of the Interior's Standards for Archeological Documentation* and the requirements set forth in HAR Chapter 13-276 "Rules governing standards for Archaeological Inventory Surveys and Reports." Hard copies of the final reports and PDF's have been requested in prior correspondence. Appendix C lists all of the volumes related to the AIS for this project and encompassed by this acceptance letter. We look forward to receiving an IPP and detailed mitigation plans per HAR Chapters 13-275-8, 9 and 10. Please contact Dr. Susan A Lebo at (808) 692-8019 or Susan.A.Lebo@hawaii.gov if you have any questions regarding this letter.

Aloha,

William J. Aila, Jr.
State Historic Preservation Officer

Enclosures:

Appendix A: HCRTCP List of Reports Accepted by SHPD
Appendix B: List of Potentially Affected Sites, Significance and Mitigation
Appendix C: List of Reports Associated with the Archaeological Inventory Survey for the Honolulu High Capacity Rapid Transit Corridor Project.
Appendix D: SHPD Acceptance Letters for the Honolulu High Capacity Rapid Transit Corridor

Appendix A: HHCRTCP List of Reports Accepted by SHPD

Phase I	Type	Accepted	Log No.	Doc. No.	APE	Survey Area	SIHP sites	Mitigation
Archaeological Inventor Survey Plan for Construction Phase I of the Honolulu High-Capacity Transi Corridor Project, Station 392+00 (Near East Kapolei Station) to Station 776+00 (Near Waimano Home Road), Honouliuli, Hoaeae, Waikele, Waipio and Waiawa Ahupua'a. 'Ewa District, O'ahu, Hawaii. TMK: (1) 0-1, 9-4, 9-5, 9-6, 9-7 (Various Plats and Parcels) (Hammatt and Shideler, March 2009)	AISP	3/16/2009	2009.1325	0903WT115				
Archaeological Inventory Survey for Construction Phase I of the Honolulu High-Capacity Transit Corridor Project, Honouliuli, Ho'ae'ae, Waikele, Waipi'o and Waiawa Ahupua'a, Ewa District, O'ahu Hawaii, TMK: (1) 9-1, 9-4, 9-6, 9-7 (Various Plats an Parcels) (Hammatt, February 2010)	AIS	4/19/2010	2010.1749	1004MV01	75 acres	156 acres	50-80-09-7751	Data Recovery
Archaeological Data Recovery Plan for SIHP# 50-80-09-7751, Waipahu Transit Center Station, Honolulu High Capacity Transit Corridor Project Waikele Ahupua'a, 'Ewa District, Island of O'ahu. TMK (1) 9-4-019:050 &:061 (O'Hare, Monahan, and Hammatt, March 2011)	DRP	11/29/2011	2011.0902	1111MV19			50-80-09-7751	Data Recovery
End of Archaeological Data Recovery Fieldwork Letter for Archaeological Cultural Resource SHIP #50-80-09-7751 witin the Waipahu Transit Center Station, Honolulu High-Capacity Transit Corridor Project, Waikele Ahupua'a, 'Ewa District, Island of O'ahu. TMK: (1) 9-4-019:050, 061 (por) (Sroat, McDermott, and Hammatt, July 2013)	EOF	8/27/2013	2013.4528	1308SL24			50-80-09-7751	Step one, EoF complete, waiting for Data Recovery Report (Step 2)

Appendix A: HHCRTCP List of Reports Accepted by SHPD

Phase 2	Type	Accepted	Log No.	Doc. No.	APE	Survey Area	SIHP Sites	Mitigation
Archaeological Inventory Survey Plan for Construction Phase II of the Honolulu High-Capacity Transit Corridor Project, Waiawa, Manana, Waimano, Waiau, Waimalu, Kalauao, 'Aiea and Halawa Ahupua'a, 'Ewa District, O'ahu Hawaii. TMK: (1) 9-7, 9-8, 9-9 Various Plats and Parcels. [Hammatt & Shideler MA, March 2009].	AISP	5/7/2010	2010.1748	1005NM14				
Archaeological Inventory Survey for Construction Phase 2 of the Honolulu High Capacity Transit Corridor Project, Waiawa, Manana, Waimano, Waiau, Waimalu, Kalauao, Aiea and Halawa Ahupua'a, 'Ewa District, Island of O'ahu. TMK (1) 9-7, 9-8, 9-9 Various Plats and Parcels. (Sroat, Thurman, and McDermott, April 2012).	AISR	5/23/2012	2012.1449	1205NN23	13.87 acres	3.9 miles	50-80-09-7150	On-site Monitoring
Archaeological Monitoring Plan for Construction Phase 2 of the Honolulu High-Capacity Transit Corridor Project, Waiawa, Manana, Waimano, Waiau, Waimalu, Kalauao, 'Aiea and Halawa Ahupua'a, 'Ewa District, Island of O'ahu. TMK (1) 9-7, 9-8, 9-9 Various Plats and Parcels. [Sroat & McDermott (April 2012)].	AMP	5/16/2012	2012.1041	1205NN12				
Supplemental Archaeological Inventory Survey for Section 2 of the Honolulu High-Capacity Transit Corridor Projet, Proposed Pearlridge Station, Waimalu Ahupua'a, 'Ewa District, Island of O'ahu. TMK (1) 9-8-009:017 and (1) 9-8-010:002 (Sroat, Matsushima, and McDermott, August 2013)	SAISR	8/27/2013	2013.4527	1308SL22	0.2 acres	0.2	none	Monitoring

Appendix A: HHCRTCP List of Reports Accepted by SHPD

Phase 3	Type	Accepted	Log No.	Doc No	APE	Survey Area	SIHP Sites	Mitigation
Archaeological Inventory Survey Plan for the Airport (Phase 3) Construction of the Honolulu High Capacity Transit Corridor Project, Halawa and Moanalua Ahupua'a, 'Ewa and Honolulu District, Island of Oahu TMK: (1) 1-1 and 9-9. (Hammatt and Shideler, August 2011)	AISP	12/2/2011	2011.2167	1112NN01				
Addendum to an Archaeological Inventory Survey Plan for the Airport (Phase 3) Construction of the Honolulu High-Capacity Transit Corridor Project Halawa and Moanalua Ahupua'a, 'Ewa and Honolulu Districts, O'ahu Island. TMK: (1) 1-1 and 9-9 (Various Plats and Parcels) (Hammatt and Shideler, February 2013)	Ad AISP	3/1/2013	2013.1957	1302SL29				
Archaeological Inventory Survey for the Airport Section (Construction Section 3) of the Honolulu High-Capacity Transit Corridor Project Hālawa and Moanalua Ahupuaʻa, ʻEwa and Honolulu Districts, Oʻahu Island TMK Sections [1] 1-1 and 9-9 (Various Plats and Parcels) (Hammatt et al., August 2013)	AISR	8/26/2013	2013.2279 2013.4326	1308SL20	9.6 acres	4.8 miles	50-80-13-7420 and 7421	Monitoring

Appendix A: HHCRTCP List of Reports Accepted by SHPD

Phase 4	Type	Accepted	Log No.	Doc No	APE	Survey Area	SIHP Sites	Mitigation
Archaeological Inventory Survey Plan for the City Center (Construction Phase 4) of the Honolulu High-Capacity Transit Corridor Project, Kalihi, Kapalama and Honolulu Ahupuaa, Honolulu district, Island of Oahu. TMK: (1) 1-2, 1-5, 1-7, 2-1, 2-3 (Various Plats and Parcels. Volume I: Plan and Appendices F & G and Volume II: Appendices A-E, Land Document (Hammatt et al., August 2011)	AISP	10/25/2011	2011.2379	1110NN08				
Addendum to an Archaeological Inventory Survey Plan for the City Center (Phase 4) of the Honolulu High-Capacity Transit Corridor Project, Kalihi, Kapalama and Honolulu Ahupua'a, Honolulu District, Island of Oahu. TMK: (1) 2-1, 2-3 (Various Plats and Parcels) Addressing Changes from the Vicinity of Ward Avenue and Halekauwila Street to the Vicinity of Queen and Kamakee Streets. TMK (1) 2-1, 2-3 various plats and parcels (Hammatt et al., February 2013)	Ad AISR	3/1/2013	2013.1958	1302SL28				
Archaeological Inventory Survey Report (AISR) for Construction Phase 4 of the Honolulu High-Capacity Transit Corridor Project, Kalihi, Kapālama, and Honolulu Ahupuaʻa, Honolulu District, Oʻahu Island TMK Sections [1] 1-2, 1-5, 1-7, 2-1, 2-3 (Various Plats and Parcels) (Hammatt, et al., June 2013)	AISR	8/26/2013	2013.2564 2013.4338	1308SL21	13.9 acres	4.3 miles	19 sites (see attacment B)	Data recovery, Monitoring and Burial treatment plans

Appendix B: List of Sites in the Rail Corridor, Significance and Agreed to Mitigation

SIHP#	Test Excavation # And Phase	Description/Formal Type	Significance/Eligibility		Mitigation
			Hawaii Register	National Register	
	PHASE 1				
50-80-09-7751	Waipahu Transit Center Station Makai T-01 through T-06	Subsurface lo‘i sediments	D	D	Data Recovery
	PHASE 2				
50-80-09-7150	E-7	Former ponded taro fields	D	D	Monitoring
	PHASE 3				
50-80-13-7420	T-015, T017 and T018	Buried asphalt roadway	D	D	Monitoring
80-80-13-7421	T-021, T022 through T-026, T-042 and T-046	Buried concrete slabs, coral pavement and base course sections	D	D	Monitoring
	PHASE 4				
50-80-14-7425	T-020	Subsurface *imu* (earth oven) feature	D	D	Monitoring
50-80-14-7426	T-054 through T-082, and 085	Subsurface wetland deposit	D	D	Monitoring
50-80-14-7506	T-064, T-066 and T-067	Subsurface incinerated trash deposit	D	D	Monitoring
50-80-14-5368	T-088, 091, 092, 093, and 094	Subsurface remnants of Kūwili Fishpond	D	D	Monitoring
50 80-14-5966	T-095	Kawa Fishpond – sediments not found because trench abandoned.	D	D	Data Recovery, Monitoring
50-80-14-7427	T-096 through T-101 and test bores C-1-C-6	Subsurface historic building foundations and walls and underlying culturally enriched sediments, also one human talus bone in a fill deposit	D, E	D	Monitoring, Data Recovery, and Burial Treatment
50-80-14-7428	T-119, 119A, 120, 120A, 120B	Subsurface culturally-enriched sand A-horizon (T-120, T-120A, and T-120B) and historic warehouse foundation (T-119 and T-119A)	D	D	Data Recovery and monitoring of sand A-horizon (T-120, 120A, and 120B), monitoring for historic foundation (T-119 and 119A)
50-80-14-2963	T-122, 123, and 124	Subsurface pond sediments containing historic artifacts, culturally-enriched sand A-horizon, also includes 7 human burials as described in the adjacent Makai Parking Garage monitoring report.	D, E	D	Monitoring for pond sediments, data recovery and monitoring for culturally-enriched sand A-horizon
50-80-14-7124	T-132	Subsurface historic building remnants	D	D	Monitoring

SIHP#	Test Excavation # And Phase	Description/Formal Type	Significance/Eligibility		Mitigation
			Hawaii Register	National Register	
50-80-14-7189	T-130, 132, 134, 138, 140, 231A, 232, and 232A	Subsurface fill layer containing burnt historic trash from open burning	D	D	Monitoring
50-80-14-7190	T-229 and 230	Subsurface salt pan remnants	D	D	Data Recovery, Monitoring
50-80-14-7197	Not observed (see mitigation)	Subsurface culturally–enriched sand A-horizon	D	D	Monitoring; Not observed in current AIS (see mitigation), but potentially affected by project construction due to close proximity
50-80-14- 5820	T-141, 142, 145, 146A, 150, 151, 151A	Human skeletal remains/burials and subsurface culturally enriched sand A-horizon	D, E	D	Data Recovery, Monitoring, Burial Treatment Plan
50-80-14-7429	T-167, 168, 168A, 168B, 169, 170, and 170A	Subsurface culturally-enriched sand A-horizon and human cranial Fragment in T-170	D, E	D	Data Recovery, Monitoring, Burial Treatment
50-80-14-6856	T-181-185	Subsurface remnants of Kolowalu Fishpond	D	D	Monitoring
50-80-14-6636	T-186-193, 195, 196, 198-200, 202, 202A, 203, 205, 207, 208, 210-212, 214, 219, and 220	Subsurface remnants of the former Kewalo wetland	D	D	Monitoring
50-80-14-7430	T-202	Subsurface remnant of a historic privy	D	D	Monitoring
50-80-14-7193	T-214	Subsurface historic refuse-enriched fill deposit	Ineligible	Ineligible	NA
50-80-14-2918	T-226A, B, C, and D, T-227 and 227A	Subsurface culturally-enriched sand A-horizon with human skeletal remains/burials, also includes iron historic trolley or cart tracks	D, E	D	Data Recovery, Monitoring, Burial Treatment

Appendix C: List of Final Reports Associated with the Archaeological Inventory Survey for the Honolulu High Capacity Rapid Transit Corridor Project

HHCTCP Construction Section 1

Hammatt, Hallett, H., and David W. Shideler
2009 *Archaeological Inventory Survey Plan For Construction Phase I of the Honolulu High-Capacity Transit Corridor Project Station 392+00 (near East Kapolei Station) to Station 776+00 (near Waimano Home Road), Honouliuli, Ho'ae'ae, Waikele, Waipi'o, and Waiawa Ahupua'a, 'Ewa District, O'ahu*. Cultural Surveys Hawai'i, Inc., Kailua, Hawai'i. March

Hammatt, Hallett H.
2010 *Archaeological Inventory Survey of Construction Phase I for the Honolulu High-Capacity Transit Corridor Project, Honouliuli, Ho'ae'ae, Waikele, Waipi'o, Waiawa, and Manana Ahupua'a, 'Ewa District, Island of O'ahu {TMK: [1] 9-1, 9-4, 9-6, 9-7 (Various Plats and Parcels).* Cultural Surveys Hawai'i, Inc., Kailua, Hawai'i. April

O'Hare, Constance R., Chris Monahan, and Hallett H. Hammatt
2011 *Archaeological Data Recovery Plan for SIHP # 50-80-09-7751, Waipahu Transit Center Station, Honolulu High-Capacity Transit Corridor Project, Waikele Ahupua'a, 'Ewa District, Island of O'ahu TMK: [1] 9-4-019:050, 061.* Cultural Surveys Hawai'i, Kailua, Hawai'i. March

Cultural Surveys Hawai'i, Inc.
2013 *End of Archaeological Data Recovery Fieldwork Letter for Archaeological Cultural Resource SIHP # 50-80-09-7751 within the Waipahu Transit Center Station, Honolulu High-Capacity Transit Corridor Project, Waikele Ahupua'a, 'Ewa District, Island of O'ahu TMK: (1) 9-4-019:050, 061 por.* Cultural Surveys Hawai'i, Kailua, Hawai'i. August

HHCTCP Construction Section 2

Hammatt, Hallett H.
2010 *Archaeological Inventory Survey Plan for Construction Phase II of the Honolulu High-Capacity Transit Corridor Project, Waiawa, Manana, Waimano, Waiau, Waimalu, Kalauao, 'Aiea, and Halawa Ahupua'a, 'Ewa District, Island of O'ahu, TMK: [1] 9-7, 9-8, and 9-9 (Various Plats and Parcels).* Cultural Surveys Hawai'i, Inc., Kailua, Hawai'i. April

Sroat, Ena, Douglas Thurman, and Matt McDermott
2012 *Archaeological Inventory Survey for Construction Phase 2 of the Honolulu High-Capacity Transit Corridor Project, Waiawa, Manana, Waimano, Waiau, Waimalu, Kalauao, 'Aiea, and Halawa Ahupua'a, 'Ewa District, Island of O'ahu TMK: [1] 9-7, 9-8, and 9-9 (Various Plats and Parcels)*. Cultural Surveys Hawai'i, Kailua. May

Sroat, Ena, Kimi Matsushima, and Matt McDermott
2013 *Supplemental Archaeological Inventory Survey for Section 2 of the Honolulu High-Capacity Transit Corridor Project, Proposed Pearlridge Station, Waimalu Ahupuaʻa, ʻEwa District, Island of Oʻahu, TMK: (1) 9-8-009:017 and (1) 9-8-010:002.* Cultural Surveys Hawai'i, Inc., Kailua, Hawai'i. August

Sroat, Ena, and Matt McDermott
2012 *Archaeological Monitoring Plan for Construction Phase 2 of the Honolulu High-Capacity Transit Corridor Project, Waiawa, Manana, Waimano, Waiau, Waimalu, Kalauao, 'Aiea, and Halawa Ahupua'a, 'Ewa District, Island of O'ahu TMK: [1]9-7, 9-8, and 9-9 (Various Plats and Parcels.* Cultural Surveys Hawai'i, Kailua. May

<u>HHCTCP Construction Section 3</u>

Hammatt, Hallett H. and David W. Shideler
2011 *Archaeological Inventory Survey Plan For the Airport (Phase 3) Construction of the Honolulu High-Capacity Transit Corridor Project, Hālawa and Moanalua Ahupuaʻa, ʻEwa and Honolulu Districts, Oʻahu Island, TMK Sections [1] 1-1 and 9-9.* Cultural Surveys Hawai'i, Kailua. August

Hammatt, Hallett H. and David W. Shideler
2013 *Addendum to an Archaeological Inventory Survey Plan For the Airport (Phase 3) Construction of the Honolulu High-Capacity Transit Corridor Project, Hālawa and Moanalua Ahupuaʻa, ʻEwa and Honolulu Districts, Oʻahu Island, TMK Sections [1] 1-1 and 9-9*. Cultural Surveys Hawai'i, Kailua. March

Hammatt, Hallett H., David W. Shideler, and Matt McDermott
2013 *Archaeological Inventory Survey for the Airport Section (Construction Section 3) of the Honolulu High-Capacity Transit Corridor Project, Hālawa and Moanalua Ahupuaʻa, ʻEwa and Honolulu Districts, Island of Oʻahu, TMK Sections [1] 1-1 and 9-9 (Various Plats and Parcels), Volume 1 of 2*. Cultural Surveys Hawai'i, Kailua. August

2013 *Archaeological Inventory Survey for the Airport Section (Construction Section 3) of the Honolulu High-Capacity Transit Corridor Project, Hālawa and Moanalua Ahupuaʻa, ʻEwa and Honolulu Districts, Island of Oʻahu, TMK Sections [1] 1-1 and 9-9 (Various Plats and Parcels), Volume 2 of 2: Appendices*. Cultural Surveys Hawai'i, Kailua. August

<u>HHCTCP Construction Section 4</u>

Hammatt, Hallett H., Constance O'Hare, Jon Tulchin, David W. Shideler, Kelly Burke, Ena Sroat, and Matt McDermott
2011 *Archaeological Inventory Survey Plan For the City Center (Construction Phase 4) of the Honolulu High-Capacity Transit Corridor Project, Kalihi, Kapālama, and Honolulu Ahupuaʻa, Honolulu District, Island of Oʻahu, TMK: [1] 1-2, 1-5, 1-7, 2-1, 2-3 (Various Plats and Parcels)*. Cultural Surveys Hawai'i, Kailua. September

Hammatt, Hallett H., Constance O'Hare, Jon Tulchin, David W. Shideler, Kelly Burke, Ena Sroat, and Matt McDermott

2013 *Addendum to the Archaeological Inventory Survey Plan For the City Center (Construction Phase 4) of the Honolulu High-Capacity Transit Corridor Project, Kalihi, Kapālama, and Honolulu Ahupuaʻa, Honolulu District, Island of Oʻahu, TMK: [1] 2-1, 2-3 (Various Plats and Parcels), Addressing Changes from the Vicinity of Ward Avenue and Halekauwila Street to the Vicinity of Queen and Kamakeʻe Streets*. Cultural Surveys Hawai'i, Kailua. March

Hammatt, Hallett H.

2013 *Archaeological Inventory Survey Report For City Center (Section 4) of the Honolulu High-Capacity Transit Corridor Project, Kalihi, Kapālama, Honolulu, and Waikīkī Ahupuaʻa, Honolulu (Kona) District, Island of Oʻahu, TMK [1] 1-2, 1-5, 1-7, 2-1, 2-3 (Various Plats and Parcels), Volume I*. Cultural Surveys Hawai'i, Kailua. August

2013 *Archaeological Inventory Survey Report For City Center (Section 4) of the Honolulu High-Capacity Transit Corridor Project, Kalihi, Kapālama, Honolulu, and Waikīkī Ahupuaʻa, Honolulu (Kona) District, Island of Oʻahu, TMK [1] 1-2, 1-5, 1-7, 2-1, 2-3 (Various Plats and Parcels), Volume II: Cultural, Historical and Archaeological Background*. Cultural Surveys Hawai'i, Kailua. August

2013 *Archaeological Inventory Survey Report For City Center (Section 4) of the Honolulu High-Capacity Transit Corridor Project, Kalihi, Kapālama, Honolulu, and Waikīkī Ahupuaʻa, Honolulu (Kona) District, Island of Oʻahu, TMK [1] 1-2, 1-5, 1-7, 2-1, 2-3 (Various Plats and Parcels), Volume III: Appendices A–F, Land Documents*. Cultural Surveys Hawai'i, Kailua. August

2013 *Archaeological Inventory Survey Report For City Center (Section 4) of the Honolulu High-Capacity Transit Corridor Project, Kalihi, Kapālama, Honolulu, and Waikīkī Ahupuaʻa, Honolulu (Kona) District, Island of Oʻahu, TMK [1] 1-2, 1-5, 1-7, 2-1, 2-3 (Various Plats and Parcels), Volume IVA, Excavation Results: Zone 1, West Kalihi and Zone 2, East Kalihi*. Cultural Surveys Hawai'i, Kailua. August

2013 *Archaeological Inventory Survey Report For City Center (Section 4) of the Honolulu High-Capacity Transit Corridor Project, Kalihi, Kapālama, Honolulu, and Waikīkī Ahupuaʻa, Honolulu (Kona) District, Island of Oʻahu, TMK [1] 1-2, 1-5, 1-7, 2-1, 2-3 (Various Plats and Parcels), Volume IVB, Excavation Results: Zone 3, West Kapālama; Zone 4, East Kapālama; and Zone 5, Iwilei*. Cultural Surveys Hawai'i, Kailua. August

2013 *Archaeological Inventory Survey Report For City Center (Section 4) of the Honolulu High-Capacity Transit Corridor Project, Kalihi, Kapālama, Honolulu, and Waikīkī Ahupuaʻa, Honolulu (Kona) District, Island of Oʻahu, TMK [1] 1-2, 1-5, 1-7, 2-1, 2-3 (Various Plats and Parcels), Volume IVC, Excavation Results: Zone 6, Downtown Waterfront; Zone 7, West Kakaʻako; and Zone 8, Kewalo*. Cultural Surveys Hawai'i, Kailua. August

2013 *Archaeological Inventory Survey Report For City Center (Section 4) of the Honolulu High-Capacity Transit Corridor Project, Kalihi, Kapālama, Honolulu, and Waikīkī Ahupuaʻa, Honolulu (Kona) District, Island of Oʻahu, TMK [1] 1-2, 1-5, 1-7, 2-1, 2-3 (Various Plats and Parcels), Volume IVD, Excavation Results: Zone 9, East Kakaʻako; Zone 10, Kālia; and Zone 11, Kakaʻako Makai*. Cultural Surveys Hawai'i, Kailua. August

2013 *Archaeological Inventory Survey Report For City Center (Section 4) of the Honolulu High-Capacity Transit Corridor Project, Kalihi, Kapālama, Honolulu, and Waikīkī Ahupuaʻa, Honolulu (Kona) District, Island of Oʻahu, TMK [1] 1-2, 1-5, 1-7, 2-1, 2-3 (Various Plats and Parcels), Volume V: Lab Results*. Cultural Surveys Hawai'i, Kailua. August

2013 *Archaeological Inventory Survey Report For City Center (Section 4) of the Honolulu High-Capacity Transit Corridor Project, Kalihi, Kapālama, Honolulu, and Waikīkī Ahupuaʻa, Honolulu (Kona) District, Island of Oʻahu, TMK [1] 1-2, 1-5, 1-7, 2-1, 2-3 (Various Plats and Parcels), Volume VIA, GPR Results: Zone 1, West Kalihi; Zone 2, East Kalihi; Zone 3, West Kapālama; Zone 4, East Kapālama; Zone 5, Iwilei; Zone 6, Downtown Waterfront*. Cultural Surveys Hawai'i, Kailua. August

2013 *Archaeological Inventory Survey Report For City Center (Section 4) of the Honolulu High-Capacity Transit Corridor Project, Kalihi, Kapālama, Honolulu, and Waikīkī Ahupuaʻa, Honolulu (Kona) District, Island of Oʻahu, TMK [1] 1-2, 1-5, 1-7, 2-1, 2-3 (Various Plats and Parcels), Volume VIB, GPR Results: Zone 7, Kakaʻako West; Zone 8, Kewalo; Zone 9, Kakaʻako East; Zone 10, Kālia; Zone 11 Kakaʻako Makai*. Cultural Surveys Hawai'i, Kailua. August

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August 27, 2013

Mr. Matt McDermott, Principal Investigator
Cultural Surveys Hawai'i, Inc.
P.O. Box 1114
Kailua, Hawaii 96734

LOG NO: 2013.4528
DOC NO: 1308SL24
Archaeology

Dear Mr. McDermott:

SUBJECT: **Chapter 6E-8 and National Historic Preservation Act (NHPA) Section 106 Review – End of Archaeological Data Recovery Fieldwork Letter for Archaeological Cultural Resource SIHP 50-80-09-7751 within the Waipahu Transit Center Station, Honolulu High-Capacity Transit Corridor Project**
Waikele Ahupua'a, 'Ewa District, Island of O'ahu
TMK: (1) 9-4-019:050, 061 por.

Thank you for the opportunity to review the report titled *End of Archaeological Data Recovery Fieldwork Letter for Archaeological Cultural Resource SIHP 50-80-09-7751 within the Waipahu Transit Center Station, Honolulu High-Capacity Transit Corridor Project Waikele Ahupua'a, 'Ewa District, Island of O'ahu TMK: (1) 9-4-019:050, 061 por.* (Sroat, McDermmott, and Hammatt, July 2013). We received this submittal on July 25, 2013.

The project area consists of the Waipahu Transit Center Station situated within portions of TMK: (1) 9-4-019:050 and 061. The project acreage totals approximately 0.27 acres. It is located within Section 1 of the Honolulu High-Capacity Transit Corridor Project (HHCTCP). The HHCTCP includes the use of federal funds and involves lands under several jurisdictions, including Federal, State, City and County of Honolulu, and private. Pursuant to 36 CFR §800.3(a), the proposed project constitutes an undertaking subject to review under Section 106. The entire project was determined to have an adverse effect on historic properties. A Programmatic Agreement (PA) stipulating mitigation commitments was executed on January 18, 2011 with the Federal Transit Administration (FTA), the Hawaii State Historic Preservation Officer (SHPO), the U.S. Navy, and the Advisory Council on Historic Preservation (ACHP) as signatories, and the City and County of Honolulu (C&C Honolulu) as an invited signatory. The area of potential effect (APE) for archaeology is defined in the PA as all areas of direct ground disturbance, including utilities. An archaeological inventory survey following HAR §13-276 was stipulated as a mitigation commitment in the PA.

The End of Fieldwork Letter report (EOF Letter) indicates SIHP 50-80-09-7751 is a subsurface pre-Contact ponded field or *lo'i* deposit identified within the *makai* (southern) portion of the proposed Waipahu Transit Center Station, just south of Farrington Highway. SIHP 7751 was the only historic property identified during the archaeological inventory survey (AIS) conducted for HHCTCP Section 1 (Hammatt 2010). The AIS report was reviewed and accepted by SHPD on April 19, 2010 (Log No. 2010.1749, Doc. No. 1004MV01). SHPD concurred with the evaluation of significance, project-specific effect recommendations, and proposed mitigation recommendations. SIHP 7751 was evaluated as significant under Criterion D of the National and Hawai'i Registers of Historic Places. Under Hawaii State historic preservation review legislation [HAR §13-275-7(2)], the effect recommendation was "effect, with proposed mitigation commitments," and under federal historic preservation review legislation (36 CFR 800.5), it was "no adverse effect" with the understanding that proposed data recovery would mitigate the undertaking's potential effect to National register-eligible cultural resources.

The data recovery plan (DRP) prepared for SIHP 7751 (O'Hare et al., March 2011) was reviewed and accepted by SHPD on November 29, 2011 (Log No. 2011.0902, Doc. No. 1111MV19). The research objectives specified in the DRP centered on investigating the chronology of the initial construction of the site, its history of use, and examining the paleo-environmental record associated with this low-energy alluvial deposit and surrounding area. The planned research methods specified excavation of two 10-meter long test trenches; collection of one 5-liter bulk sample, one column sample, and one core sample from each trench; laboratory analysis of any artifacts and faunal remains encountered; and specialized analyses involving wood taxa identification, radiocarbon dating, sediment textural analysis and palynology, including micro charcoal particle quantification.

Data recovery fieldwork was conducted by Cultural Surveys Hawai'i, Inc., on April 29 and 30, 2013, in accordance with the DRP accepted by SHPD on November 29, 2011 (Log No. 2011.0902, Doc. No. 1111MV19). The completed fieldwork involved excavation of two ten-meter long trenches (DR1 and DR2), collection of six bulk samples of pondfield/wetland sediments from DR1 and four from DR2; two column samples from DR1 and one from DR2; and two core samples each from both trenches. As specified in the DRP, the EOF Letter report indicates that pollen studies, wood taxa speciation, radiocarbon dating, and palynology, including micro charcoal particle quantification will be conducted. The EOF Letter also indicates no additional historic properties were identified, and no discrete features such as pondfield berms or *'auwai* were identified during the data recovery investigations.

The EOF Letter adequately describes the data recovery project, including a summary of the plan specifications, investigation methods and procedures, preliminary field results, and the proposed laboratory analyses. This End of Archaeological Data Recovery Fieldwork Letter report meets the minimum requirements specified in the *Secretary of the Interior's Standards for Archeological Documentation* and the requirements set forth in HAR §13-275-9(d)(1). It is accepted by SHPD with the understanding that construction may not proceed until detailed mitigation plans or interim measures to address all of the sites in the entire corridor are received. In accordance with HAR §13-275-9(d)(2), a data recovery report meeting the requirements set forth in HAR §13-278-4 shall be submitted to SHPD for review and approval.

Please send one hardcopy of this End-of Fieldwork Letter , clearly marked FINAL, along with a copy of this review letter and a text-searchable PDF version on CD to the Kapolei SHPD office. Please contact Susan A Lebo at (808) 692-8019 or at Susan.A.Lebo@hawaii.gov if you have any questions regarding this letter.

Aloha,

William J. Aila, Jr.
State Historic Preservation Officer

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POST OFFICE BOX 621
HONOLULU, HAWAII 96809

August 29, 2013

Dan Grabauskas
Honolulu Authority for Rapid Transportation
City and County of Honolulu
Alii Place, Suite 1700
1099 Alakea Street, Honolulu, HI 96813

Log No. 2013.5066A
Doc No. 1308PA01

Dear Mr. Grabauskas:

SUBJECT: **HRS §6E-8 Review of an Interim Protection Plan in compliance HAR Section 13-275-9(d) for the Honolulu High-Capacity Rapid Transit Corridor Project, East Kapolei to Ala Moana Center**
Honouliuli, Ho'ae'ae, Waikele, Waipi'o, Waiawa, Manana, Waimanalo, Waiau, Kalauao, 'Aiea and Halawa, Moanalua, Kalihi, Kapālama, Honolulu and Waikiki Ahupua'a, 'Ewa and Honolulu Districts, Island of O'ahu.
TMK (1) 1-1, 1-2, 1-5, 1-7, 2-1, 2-3, 9-1, 9-4, 9-6, 9-7, 9-8, and 9-9 (various Plats and Parcels)

Thank you for the opportunity to review the report titled *Interim Protection Plan for the Honolulu High Capacity Transit Corridor Project (*Hammatt and Shideler, August 2013*)*. It was received by SHPD on August 29, 2013.

Honolulu Authority for Rapid Transportation (HART) is requesting an accelerated, two step verification of compliance with the historic preservation process under HAR Section 13-275-9 (d). Step 1 of this process involves "documentation to SHPD indicating that data recovery fieldwork . . . or interim protection measures for properties to be preserved have been successful completed." This interim protection plan is being submitted to meet Step 1 of the two step verification process and is done with the understanding that Step 2 must be completed to conclude the historic preservation process.

An Archaeological Inventory Survey (AIS) for the entire Honolulu High Capacity Rapid Transit Corridor Project (HHCRTCP, or project) was accepted by SHPD (Log No. 2013.4987, Doc No. 1308SL23). A total of 21 sites were found during the AIS. Two additional sites were not found (Sites 50-80-14-7197 and 50-80-14-5966), but because of their close proximity to the project have the potential to be affected by the project and were included in mitigation measures. One of the sites found was deemed not to meet the significance criteria under HAR Chapter 13-275-6(b). The mitigation measure for thirteen of the sites is monitoring, and the mitigation for nine of the sites is data recovery and monitoring. In addition seven sets of *iwi kupuna*, or human skeletal remains were found at four of the sites. The recommendation is preservation in place. Thank you for the table on pages 3-5 which lists all sites and the mitigation status. We have included a copy of this table as an enclosure to this letter for ease of reference.

For the section of the project that extends from East Kapolei to Leeward Community College (Construction Phase 1), the agreed-upon mitigation was data recovery in Site 50-80-09-7751, subsurface *lo'i* sediments. An End-of-Fieldwork Letter has been accepted for this site (Log No. 2013.4528, Doc No. 1308SL24. Therefore no additional protection measures are required for Phase 1 and construction can start in that area of the project corridor.

For section of the project on Kamehameha Highway from Leeward Community College to Aloha Stadium (Construction Phase 2), monitoring was the agreed-upon mitigation measure for site 50-80-09-7150, former ponded

taro fields. An archaeological monitoring plan for this site has been reviewed and accepted by SHPD (Log No. 2012.1041, Doc No. 1205NN12). Therefore, no additional protection measures are needed for Phase 2 and construction can start in that area of the project corridor.

For the section of the project extending from Aloha Stadium to approximately the Middle Street Interchange (Construction Phase 3) there were two historic properties found, SIHP site 50-80-13-7420 and 50-80-13-7421. Monitoring is the agreed-upon mitigation for both these properties. A monitoring plan has not been reviewed and accepted by SHPD, therefore as an interim protection measure HART is proposing that no construction take place in the HHCRTCP between Halawa Stream and Pu'uhale Road. A letter stating such has been sent to the construction contracting firm and a copy has been provided to SHPD. No physical measures will be taken to mark the sites, as they are subsurface and continuing surface use will not damage either site.

For the section of the project extending from Middle Street to Ala Moana Center (Construction Phase 4) a total of 19 historic properties were found. The agreed-upon mitigation for eleven sites is monitoring and for eight sites is data recovery and monitoring. All four burial sites are in phase 4 of the project. SHPD has not reviewed monitoring, data recovery, or burial treatment plans for Construction Phase 4. The interim protection plan proposes that no construction be done between Pu'uhale Road and Ala Moana Center until a monitoring plan for Construction Phase 4 has been reviewed and accepted by SHPD. The monitoring plan will provide for construction buffers for the data recovery sites until a data recovery plan and End of Fieldwork Letter are accepted by SHPD. *SHPD adds the following conditions before it will approve the start of construction in Construction Phase 4: 1) a Data Recovery Plan must be accepted by SHPD, 2)an End-of-Fieldwork Letter must be accepted by SHPD, and 3) the archaeological monitoring plan will include construction buffers for the four burial sites in the event that a Burial Treatment Plan has not been approved by the O'ahu Island Burial Council and SHPD prior to review and acceptance of the End-of-Fieldwork Letter and the monitoring plan.* No physical measures will be taken to mark the sites as they are all subsurface and located in highly trafficked areas. All of the sites have been resurfaced. Continued surface use will not damage any of the sites. A letter stating that no construction is to take place within in the Construction Phase 4 portion of the project has been sent to the contractor and a copy has been provided to SHPD.

In regard to Table 1, please note that the criteria for the Hawaii Register are located in HAR Section 13-198-8. Significance criteria for the Historic Preservation review process are located in HAR 13-275-6(b). While the two are substantially the same, the Hawaii Register does not include criterion "e." Also, as written, the table appears to have the wrong citation. Please correct this in your final copy.

This Interim Protection Plan provides adequate protection measures for sites throughout the corridor. The protection measures are: no construction in Construction Phases 3 and 4 until SHPD accepts an archaeological monitoring plan. In addition SHPD added three conditions before construction can start in Construction Phase 4, as listed above. SHPD accepts the plan, with the modifications and conditions state above, per HAR Section 13-275-9 (d)(1). Please send one hardcopy of the document, clearly marked FINAL, along with a copy of this review letter and a text-searchable PDF version on CD to the Kapolei SHPD office.

Please contact Pua Aiu at (808) 587-1497or at pua.aiu@hawaii.gov if you have any questions regarding this letter.

Aloha,

William J. Aila, Jr.
State Historic Preservation Officer

Encl: Table 1

TABLE 1

Section and SIHP#	Description/Formal Type	Significance/Eligibility		Mitigation	Status of Mitigation
		Hawai'i Register (13-275-6 (b) criteria)	National Register (36 CFR 60.4 criteria)		
Section 1					
50-80-09-7751	Subsurface lo'i sediments	D	D	Data Recovery	Complete, End of Fieldwork letter accepted
Section 2					
50-80-09-7150	Former ponded taro fields	D	D	Monitoring	Monitoring plan accepted
Section 3					
50-80-13-7420	Buried asphalt roadway	D	D	Monitoring	Monitoring plan pending, will precede construction.
80-80-13-7421	Buried concrete slabs, coral pavement and base course sections	D	D	Monitoring	Monitoring plan pending, will precede construction.
Section 4					
50-80-14-7425	Subsurface *imu* (earth oven) feature	D	D	Monitoring	Monitoring plan pending, will precede construction.
50-80-14-7426	Subsurface wetland deposit	D	D	Monitoring	Monitoring plan pending, will precede construction.
50-80-14-7506	Subsurface incinerated trash deposit	D	D	Monitoring	Monitoring plan pending, will precede construction.
50-80-14-5368	Subsurface remnants of Kūwili Fishpond	D	D	Monitoring	Monitoring plan pending, will precede construction.
50 80-14-5966	Kawa Fishpond – sediments not found because trench abandoned	D	D	Data Recovery, Monitoring	Monitoring plan pending, will precede construction. Data recovery plan pending.
50-80-14-7427	Subsurface historic building foundations and walls and underlying culturally enriched sediments, also one human talus bone in a fill deposit	D, E	D	Monitoring, Data Recovery, and Burial Treatment	Monitoring plan pending, will precede construction. Data recovery and burial treatment plans pending.
50-80-14-7428	Subsurface culturally-enriched sand A-horizon (T-120, T-120A, and T-120B) and historic warehouse foundation (T-119 and T-119A)	D	D	Data Recovery and monitoring of sand A-horizon (T-120, 120A, and 120B), monitoring for historic foundation (T-119 and 119A)	Monitoring plan pending, will precede construction. Data recovery plan pending.

TABLE 1

Section and SIHP#	Description/Formal Type	Significance/Eligibility		Mitigation	Status of Mitigation
		Hawai'i Register (13-275-6 (b) criteria)	National Register (36 CFR 60.4 criteria)		
50-80-14-2963	Subsurface pond sediments containing historic artifacts, culturally-enriched sand A-horizon, also includes 7 human burials as described in the adjacent Makai Parking Garage monitoring report	D, E	D	Monitoring for pond sediments, data recovery and monitoring for culturally- enriched sand A-horizon	Monitoring plan pending, will precede construction. Data recovery plan pending.
50-80-14-7124	Subsurface historic building remnants	D	D	Monitoring	Monitoring plan pending, will precede construction.
50-80-14-7189	Subsurface fill layer containing burnt historic trash from open burning	D	D	Monitoring	Monitoring plan pending, will precede construction.
50-80-14-7190	Subsurface salt pan remnants	D	D	Data Recovery, Monitoring	Monitoring plan pending, will precede construction. Data recovery plan pending.
50-80-14-7197	Subsurface culturally–enriched sand A-horizon	D	D	Monitoring; Not observed in current AIS, but potentially affected by project construction due to close proximity	Monitoring plan pending, will precede construction.
50-80-14- 5820	Human skeletal remains/burials and subsurface culturally enriched sand A-horizon	D, E	D	Data Recovery, Monitoring, Burial Treatment Plan	Monitoring plan pending, will precede construction. Data recovery and burial treatment plans pending.
50-80-14-7429	Subsurface culturally-enriched sand A-horizon and human cranial Fragment in T-170	D, E	D	Data Recovery, Monitoring, Burial Treatment	Monitoring plan pending, will precede construction. Data recovery and burial treatment plans pending.
50-80-14-6856	Subsurface remnants of Kolowalu Fishpond	D	D	Monitoring	Monitoring plan pending, will precede construction.
50-80-14-6636	Subsurface remnants of the former Kewalo wetland	D	D	Monitoring	Monitoring plan pending, will precede construction.
50-80-14-7430	Subsurface remnant of a historic privy	D	D	Monitoring	Monitoring plan pending, will precede construction.
50-80-14-7193	Subsurface historic refuse-enriched fill deposit	Ineligible	Ineligible	NA	N/A

TABLE 1

Section and SIHP#	Description/Formal Type	Significance/Eligibility		Mitigation	Status of Mitigation
		Hawai'i Register (13-275-6 (b) criteria)	National Register (36 CFR 60.4 criteria)		
50-80-14-2918	Subsurface culturally-enriched sand A-horizon with human skeletal remains/burials, also includes iron historic trolley or cart tracks	D, E	D	Data Recovery, Monitoring, Burial Treatment	Monitoring plan pending, will precede construction. Data recovery and burial treatment plans pending.

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City and County of Honolulu
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1099 Alakea Street, Honolulu, HI 96813

Log No. 2013.5066B
Doc No. 1308PA02

Dear Mr. Grabauskas:

SUBJECT: **HRS §6E-8 Verification of compliance with Interim Protection Measures under HAR Section 13-275-9 and Determination Letter Concurring in Project.**
Honolulu High Capacity Rapid Transit Corridor Project, East Kapolei to Ala Moana Center
Honouliuli, Ho'ae'ae, Waikele, Waipi'o, Waiawa, Manana, Waimanalo, Waiau, Kalauao, 'Aiea and Halawa Ahupua'a, 'Ewa District and Moanalua, Kalihi, Kapālama, Honolulu and Waikīkī Ahupua'a, 'Ewa and Honolulu Districts, Island of O'ahu.
TMK: (1) 1-1, 1-2, 1-5, 1-7, 2-1, 2-3, 9-1, 9-4, 9-6, 9-7, 9-8, and 9-9 (various Plats and Parcels)

SHPD has received a request for a two-step verification of the Honolulu Authority for Rapid Transportation's compliance with the historic preservation process as outlined in HAR Section 13-275. Specific authority for two-step verification is per HAR Section 13-275-9(d). SHPD received this request on August 29, 2013

In a separate letter (Log #2013.5066A) SHPD accepted the HART Interim Protection Plan, which prohibits construction between Aloha Stadium and Ala Moana Center until area-specific monitoring plans have been accepted by SHPD. SHPD added three conditions before construction can start in the area from Middle Street to Ala Moana (Construction Phase 4): *1) a Data Recovery Plan must be accepted by SHPD, 2) an End-of-Fieldwork Letter must be accepted by SHPD, and 3) the archaeological monitoring plan must include construction buffers for the four burial sites in the event that a Burial Treatment Plan has not been approved by the O'ahu Island Burial Council and SHPD prior to review and acceptance of the End-of-Fieldwork Letter and monitoring plan.* In addition, SHPD requested one change to the heading on Table 1. Because all mitigation measures are in place for the areas between East Kapolei and the Halawa Stream, no additional interim protection measures are necessary for those areas.

The Interim Protection Plan provides adequate protection measures for sites throughout the corridor. There are no physical protection measures because construction will not be allowed until specific mitigation measures have been accepted by SHPD. By submittal of letters to AECOM Technical Services, Inc. and to Perkins+Will, HART has notified its construction firms that construction bid documents must include the aforementioned prohibitions on construction and state that these construction restrictions must remain in place "until HART provides additional confirmation of SHPD-approved direction." Accordingly, SHPD agrees that interim protection measures have been successfully completed and construction may proceed with the understanding that Step 2, the submittal and acceptance of 1) all items required in the IPP, 2) a Burial Treatment Plan, 3) an archaeological data recovery report, and 4) an archaeological monitoring report, is required to complete compliance with the historic preservation process.

Based on SHPD's concurrences and approvals for the project, including verification of compliance with the Interim Protection Plan as stated above, SHPD hereby issues this Determination Letter and concurs with the Honolulu High Capacity Rapid Transit Corridor Project.

Please contact Pua Aiu at (808) 587-1497or at pua.aiu@hawaii.gov if you have any questions regarding this letter.

Aloha,

William J. Ail, Jr.
State Historic Preservation Officer

Neck: Table 1

HART
HONOLULU AUTHORITY for RAPID TRANSPORTATION

IN REPLY REFER TO:
CMS-AP00ENV-00293

Daniel A. Grabauskas
EXECUTIVE DIRECTOR AND CEO

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September 12, 2013

Ms. Nicki Thompson, Acting Administrator
State Historic Preservation Division
Department of Land and Natural Resources
Kakuhihewa Building
601 Kamokila Boulevard, Suite 555
Kapolei, Hawaii 96707

Dear Ms. Thompson:

Subject: National Register of Historic Places (NRHP) Registration form for Mother Waldron Playground
Honolulu Rapid Transit Project (HRTP)

Thank you for your comments on the Mother Waldron Playground NRHP form, which was received on July 3, 3013. The enclosed Form has been updated, incorporating all SHPD comments.

In accordance with the HRTP Programmatic Agreement, Stipulation VI.C, 2, this document is submitted for final processing through the Hawai'i Historic Places Review Board and submittal to the National Parks Service in accordance with 36 C.F.R. § 60.6(g). Since Mother Waldron Playground was already listed on the Hawai'i Register of Historic Places on June 9, 1988, as an element of the thematic group, "City and County of Honolulu Art Deco Parks," no additional coordination with your office is required regarding Stipulation VI.C, 3.

Please contact Stanley Solamillo of HART at (808) 768-6187 if you have any questions or if we can help facilitate your review in any way. Thank you for your continued support and review of this project.

Sincerely,

Daniel A. Grabauskas
Executive Director and CEO

Enclosure

cc: Ms. Angie Westfall, SHPD
Ms. Faith Miyamoto, HART
Mr. Stanley Solamillo, HART
Mr. Lawrence Spurgeon, PB

United States Department of the Interior
National Park Service

National Register of Historic Places Registration Form

This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in National Register Bulletin, *How to Complete the National Register of Historic Places Registration Form*. If any item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions.

1. Name of Property

Historic name: Mother Waldron Playground
Other names/site number: TMK (1)(1)2-1-051:003, :005, :006, Coral Street right-of-way between Pohukaina and Halekauwila streets
Name of related multiple property listing**:** N/A
(Enter "N/A" if property is not part of a multiple property listing

2. Location

Street & number: 537 Coral Street/Bounded by Coral, Halekauwila, Pohukaina, and Cooke streets
City or town: Honolulu State: Hawaii County: Honolulu
Not For Publication: ☐ Vicinity: ☐

3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act, as amended,

I hereby certify that this ___ nomination ___ request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60.

In my opinion, the property ___ meets ___ does not meet the National Register Criteria. I recommend that this property be considered significant at the following level(s) of significance:

___national ___statewide ___local

Applicable National Register Criteria:

___A ___B ___C ___D

Signature of certifying official/Title: **Date**

State or Federal agency/bureau or Tribal Government

In my opinion, the property ___ meets ___ does not meet the National Register criteria.

Signature of commenting official: **Date**

Title : **State or Federal agency/bureau or Tribal Government**

4. National Park Service Certification

I hereby certify that this property is:

___ entered in the National Register

___ determined eligible for the National Register

___ determined not eligible for the National Register

___ removed from the National Register

___ other (explain:) _____

Signature of the Keeper Date of Action

5. Classification

Ownership of Property

(Check as many boxes as apply.)

Private: ☐

Public – Local ☒

Public – State ☒

Public – Federal ☐

Category of Property

(Check only **one** box.)

Building(s) ☐

District ☐

Site ☒

Structure ☐

Object ☐

Number of Resources within Property
(Do not include previously listed resources in the count)

Contributing	Noncontributing	
1		buildings
1	2	sites
		structures
		objects
2	2	Total

Number of contributing resources previously listed in the National Register 0

6. Function or Use
Historic Functions
(Enter categories from instructions.)
RECREATION AND CULTURE/outdoor recreation

Current Functions
(Enter categories from instructions.)
RECREATION AND CULTURE/outdoor recreation
LANDSCAPE/park

7. Description

Architectural Classification
(Enter categories from instructions.)
MODERN MOVEMENT
Moderne
Art Deco

Materials: (enter categories from instructions.)
Principal exterior materials of the property: CONCRETE, ASPHALT, STONE

Narrative Description
(Describe the historic and current physical appearance and condition of the property. Describe contributing and noncontributing resources if applicable. Begin with **a summary paragraph** that briefly describes the general characteristics of the property, such as its location, type, style, method of construction, setting, size, and significant features. Indicate whether the property has historic integrity.)

Summary Paragraph

Mother Waldron Playground is an urban playground that is bounded by Halekauwila, Cooke, Pohukaina, and Coral streets. It was constructed in 1937 on a 1.76 acre (77,000 square feet) site in the Kakaako district of Honolulu, Hawaii. It has been substantially altered from its original design since its initial construction. Built elements within the park include a comfort station and remaining portions of a low wall that encompassed the original park. The built components contain design elements of the Art Moderne and Art Deco styles, including an emphasis on horizontality, rounded corners and piers, and streamlined appearance. Mother Waldron Playground has undergone several major alterations since its initial construction, including removal and replacement of some of the park's original features, and subsequent expansions to compensate for other changes. The playground's setting just southeast of downtown Honolulu has transitioned from a mixed residential, commercial, and industrial area at the time of the park's construction into a major light industrial area now being redeveloped into a mixed-use district.

Narrative Description

Architectural and Landscape Description

The playground has a rectangular footprint and is divided into two halves: a large, southeast sod-filled area and a northwest paved area with an oval sodded center surrounded by a perimeter wall. A centrally located comfort station and low wall divides the two halves. Additional green space adjacent to the park is created by Coral Street's closure to vehicular traffic. The paved area, comprised of the northwest and southeast perimeter walls, benches, comfort station, and covered walkways, are original to the playground's 1937 construction date. Asphalt paving, the southeast sodded area, and northeast and southwest walls are 1990s additions and alterations.

Northwest, Paved Area

The paved area is the original section of the park. It contains low walls, benches, a comfort station, and covered walkways—all constructed of concrete brick. The brick has been painted tan throughout the park.

The paved area's hardscaping consists largely of asphalt. Sandstone flagstone is used below the covered walkways and in the area in front of the comfort station's northwest, Coral Street elevation. The round elevated platform on the northwest elevation is paved with the same flagstone. Northwest of this comfort station is an oval, grassy area. At the opening to Coral Street, the same sandstone flagstone is used and surrounded on either side by asphalt. Softscape features include Monkeypod and Royal Poinciana trees that are found within the paved area as well as along the Coral Street perimeter wall. The paved area on the park's southwest, Pohukaina Street end contains two volleyball courts and one basketball court. The paved area on the park's northeast, Halekauwila Street end contains small playground equipment. Clay brick is used to border the sidewalk outside and around the paved park as well as provide paving at each entrance to the park.

Walls

Mother Waldron Playground's paved area is surrounded by an approximately three foot high perimeter wall. The wall is approximately nine inches thick. Along Coral Street, this wall zig-zags forming triangular points and provides a wide opening into the park. This wall is original and composed of concrete bricks; the playground's original features are constructed using the same concrete brick. On the park's northeast and southwest sides, the walls form rectangular zig-zags. Of these wall sections, neither are in their original locations nor contain original materials. The entire perimeter wall on Coral, Halekauwila, and Pohukaina streets is divided into three sections separated by two rows of recessed brick. The middle section of wall is perforated with alternating vertical and horizontal openings. Concrete coping on top of the wall consists of alternating zig-zag and straight edges and is slightly recessed from the wall's edges. These zig-zags hint at modest Art Deco stylistic influences, though the low wall expresses heavy

influence from the streamlined, Art Moderne style. Three of the wall's four corners are cuved with entrances into the park from the sidewalk. These entrances are anchored on either side by rounded piers. Rounded piers are also found on the park side of Coral Street's zig-zag wall junctures. The southeast corner of the perimeter wall at Halekauwila Street is squared, does not allow access into the park, and is not original.

A lower, one foot high wall capped with terracotta tile extends along the paved area's southeast border. This low wall connects to the higher wall at Halekauwila Street, connects to benches at the comfort station, then continues on the southwest side of the comfort station before turning toward the open grassy area of the park and terminating.

Benches

Benches within Mother Waldron Playground are found in the alcoves created by the perimeter wall as well as in the middle of the park. These seating areas are fixed, permanent, built-in park fixtures. Along Coral Street, six triangular alcoves are filled with curved benches, whereas straight benches are found along Halekauwila and Pohukaina streets and the low wall separating the paved and grassy areas. The curved benches are original while the straight benches along Halekauwila and Pohukaina streets are not original. Two straight benches are found in the middle of the paved area and are original to the playground. Curved benches are located beneath the comfort station's curved covered walkways, separating the paved area from the grassy area. The vertical faces of the benches are inclined so that the seat is wider than the base. Benches are capped with the same terracotta tile found on the park's low wall.

Comfort Station

The comfort station, constructed of concrete brick, consists of a rectangular building flanked on either side by a curved covered walkway and displays influences of the streamlined, Art Moderne form and style. Two rows of recessed concrete brick form horizontal lines which extend across all of the building's facades at the water table and roofline. The covered walkways' curves follow along the paved area's central grassy oval. The comfort station is single-story, low and horizontal, with a flat roof capped with zig-zag coping identical to that found on the perimeter walls.

At the comfort station's northwest elevation, a central alcove lined with vertical pilasters forms the backdrop of a round, elevated platform. On either side of this alcove are finished openings with vertical concrete grilles. The recessed row near the roofline intersects with the covered walkways' curved, flat roof. These covered walkways are supported by round columns with a horizontal band of recessed brick at the same level as the recessed brick at the comfort station's water table. The covered walkways' flat roofs project slightly over the piers. Where the covered walkways intersect with the northwest elevation, a curved wall supports the walkway's roof and attaches to the building facade. These walls also help shield the entrances to the restrooms from public view.

At the comfort station's northeast and southwest elevations are open entrances to men's and women's restrooms. Drinking fountains are found in small oval alcoves near the entrances. Above the restroom entrances, the covered walkways' roofs intersect with the recessed row of brick near the roofline. On both the northeast and southwest elevations, covered walkway columns abut the comfort station. On the side of each abutting covered walkway column is one small window identical to those found on the comfort station's northwest elevation.

At the building's southeast elevation, a small room projects from the center of the building. A small semi-circular roof projects from the top row of recessed brick to cover the entrance to the small room. The entrance is found on the southwest side and is shielded from view by a short wall resembling the park's perimeter wall. This wall shares the same coping as the perimeter walls but is not perforated and contains no rows of recessed concrete brick. The projecting room's southeast elevation also contains no recessed brick at the water table level. On the projecting room's northeast and southeast elevations are two large vent openings covered by a metal grate. Four windows identical to those on the comfort station's northwest elevation are found on the southeast elevation, two on either side of the projecting room.

The comfort station's interior consists of two nearly-identical restrooms. Both contain one sink, several stalls, and a partially-enclosed changing area. The men's room contains a single urinal. The interior concrete walls and stall dividers are clad with white tile to the height of the stall walls. Above the tile the walls are painted. The stall doors are wood. The restroom floors are concrete. Although no plans for the comfort station interior were found, these interiors likely coincide with the comfort station's 1968 renovations.

Cook Street Sodded Area

In 1991-1992, a rectangular sodded parcel was added to the southeast side of Mother Waldron Playground following the realignment of Halekauwila Street. Bound by Halekauwila Street, Cooke Street, Pohukaina Street and the original 1937 playground, this area contains no buildings, walls, benches, paving, or playground equipment. A brick, almond-shaped grave marker enclosed by a cast iron fence that has been erected on the east side of the parcel. This marker is labeled *kapu*. *Kapu* means "forbidden" or "sacred," and the marker encircles an area where human remains were reinterred following Kakaako improvement projects in the 1990s. Royal Poinciana trees line the grassy area along Cooke Street with monkeypod trees clustered at the tree line's ends.

Coral Street Right-of-Way

The northwest area of the playground was added to the park around 1994-1995.[1] The area, formerly a portion of Coral Street, was closed between Halekauwila and Pohukaina streets following the completion of the 1991-1992 street realignment project. At both the northeast and southwest ends of the former Coral Street area, trees were planted. Grass replaced the street

[1] Letter from Michael N. Scarfone, Executive Director, Hawaii Community Development Authority, to Dona L. Hanaike, Director, Department of Parks and Recreation, December 14, 1994.

pavement, but a small rectangular section of pavement remains near the former Coral Street entrance to Mother Waldron Playground.

Alterations

Mother Waldron Playground has undergone major changes since its original construction. According to its Hawaii Register of Historic Places nomination form, completed in 1988, initial changes included renovations to the comfort station in 1968 and resurfacing the area in 1978. At that time, the park was bounded by Lana Lane on its southeast border. The large sodded area now a part of the park contained commercial, residential, and industrial buildings for the majority of the playground's history.

In the 1980s, the Hawaii Community Development Authority (HCDA) began plans to help revitalize the industrial Kakaako area. Included in these community development plans were road reconfigurations aimed at improving Kakaako traffic patterns. In 1991-1992, the HCDA changed the alignment of Halekauwila Street.. This realignment of Halekauwila Street required a taking of approximately 12,700 square feet of Mother Waldron Playground on the playground's northeast end which reduced the park acreage by seventeen percent (17%).[2] To reduce the impact of the playground's diminished size, the developed area southeast of Lana Lane was removed. Lana Lane, separating the playground from the developed area, was also removed. Mother Waldron Playground was subsequently enlarged by approximately 54,000 square feet southeast.[3] Although this 54,000 square foot area was officially designated for future use as part of Mother Waldron Playground, Coral Street's closure on the park's northwest side was never officially considered part of the park until the mid-1990s when improvements were made to the former Coral Street area. This final change to Mother Waldron Playground's boundaries enlarged the park by an additional 25,800 square feet.

As a result of the taking, the northeast end of the playground lost its basketball court, perimeter wall, and benches. A perimeter wall and benches nearly identical to the original were reconstructed along Halekauwila Street, but the wall now connects to the original low wall topped by terracotta tile that remains extant; the tile was not used on the replacement wall. There is no longer a convex curved entrance at the original playground's Halekauwila Street and Lana Lane corner due to the alterations. The original court and play area has been replaced with modern playground equipment.

Along Pohukaina Street, road widening related to district improvements forced the perimeter wall and benches to be removed and reconstructed approximately five to ten feet inside the playground's original boundary. To open Mother Waldron Playground to its newly-acquired 54,000 square feet southeast, a higher wall running along Lana Lane and intersecting with the rear of the comfort station was removed. The original handball court was also removed.

[2] Documentation completed in 1985 stated that 8,400 square feet of Mother Waldron Playground would be removed due to Halekauwila Street's realignment; however, following realignment, plat maps indicate approximately 12,700 square feet was removed.
[3] State of Hawaii, et al., *Final Supplemental Environmental Impact Statement for the Kakaako Community Development District Plan* (Honolulu: Hawaii Community Development Authority, 1985), IV-45.

8. Statement of Significance

Applicable National Register Criteria
(Mark "x" in one or more boxes for the criteria qualifying the property for National Register listing.)

- [x] A. Property is associated with events that have made a significant contribution to the broad patterns of our history.
- [ ] B. Property is associated with the lives of persons significant in our past.
- [x] C. Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.
- [ ] D. Property has yielded, or is likely to yield, information important in prehistory or history.

Criteria Considerations
(Mark “x” in all the boxes that apply.)

- [ ] A. Owned by a religious institution or used for religious purposes
- [ ] B. Removed from its original location
- [ ] C. A birthplace or grave
- [ ] D. A cemetery
- [ ] E. A reconstructed building, object, or structure
- [ ] F. A commemorative property
- [ ] G. Less than 50 years old or achieving significance within the past 50 years

Areas of Significance
(Enter categories from instructions.)
SOCIAL HISTORY
ENTERTAINMENT/RECREATION
ARCHITECTURE
LANDSCAPE ARCHITECTURE

Period of Significance
1937 – 1945

Significant Dates
1937

Significant Person
(Complete only if Criterion B is marked above.)

Cultural Affiliation

Architect/Builder
Bent, Harry Sims

Statement of Significance Summary Paragraph (Provide a summary paragraph that includes level of significance, applicable criteria, justification for the period of significance, and any applicable criteria considerations.)

Mother Waldron Playground is an urban park in Honolulu, Hawaii, which is eligible for the National Register of Historic Places. It is significant under Criterion A in the area of social history and entertainment/recreation for its association with the organized play and playground movement in the United States during the early twentieth century, and under Criterion C in the areas of architecture and landscape architecture for its Art Moderne and Art Deco playground design influences. The period of significance spans from 1937, when construction commenced, until 1945, when the playground movement that supported supervised play largely ceased and Honolulu's Board of Parks and Recreation was formed to rehabilitate Oahu's parks following World War II.

Narrative Statement of Significance (Provide at least **one** paragraph for each area of significance.)

Historical Narrative

Hawaii History

Early History

Polynesian settlers arrived in the isolated and uninhabited Hawaiian Islands as early as 300 A.D., with subsequent migrations taking place from the eleventh century through fourteenth century. Traversing the Pacific Ocean, these settlers brought with them a traditional land-based management system comprised of chiefs and commoners, as well as staple crops like wild ginger, gourds, taro, sugarcane, coconut, and sweet potato. A distinct Hawaiian culture evolved over time, celebrating unique stories and deities, and keeping order through a *kapu* governance system based on a strict code of conduct. By the time captain James Cook came to the islands in 1778, the islands' population was estimated as high as 300,000. Captain Cook named the islands the Sandwich Islands in honor of the Earl of Sandwich.[4]

Hawaiian Kingdom

Originally existing as a collection of independently ruled kingdoms, the Hawaiian Islands were united as a single kingdom in 1810 by King Kamehameha I. Repeated and frequent contact with Western sailing vessels gave the king access to weaponry which enabled him to defeat his rivals.

[4] Edward Joesting, *Hawaii: An Uncommon History* (New York: W.W. Norton & Co., 1972), 13, 15, 27.

Early traders to the islands brought diseases that decimated the local population. Whalers soon arrived to take advantage of Hawaii's central Pacific location for commerce and gathering needed supplies. The king's death in 1819 led to the *kapu* system's end, though outside influence began to initiate the old system as early as 1804. Missionaries arriving by 1823 brought Christianity and a written language to the islands. The Hawaiian Kingdom, recognized as a sovereign nation, entered into treaties with foreign nations, and the first such treaty with the United States took place in 1826. In 1840, the Kingdom of Hawaii promulgated its first constitution, creating a government structure that included a representative body. Foreigners, especially Westerners, immigrating to the islandsbrought changes to Hawaii's economic structure and profited from its lands and ideal trade route location. Sugarcane's rise as Hawaii's staple crop increased demand for labor, saw further demand for workers, bringing immigrants from across the world to Hawaii.

Annexation

By 1885, a group of non-native businessmen formed the Hawaiian League and began planning Hawaii annexation. The group pressured King Kalakaua to sign the Bayonet Constitution which stripped much of the king's authority and transferring it to a legislature comprised of a Hawaiian League majority. The king relented and signed the document on July 6, 1887. In 1891 Queen Liliuokalani assumed the throne and unsuccessfully attempted to repeal the Bayonet Constitution. This power struggle resulted in the Hawaiian League's overthrow of the monarchy. A coup d'etat was facilitated with the assistance of United States Minister to Hawaii John L. Stevens and United States troops. Hearing of the overthrow, President Grover Cleveland ordered an investigation and called for the reestablishment of Hawaii's monarchy. Hawaii's Provisional Government instead pushed for United States annexation but failed to receive the required two-thirds vote in the United States Senate.

When William McKinley became president in 1897, Hawaii's annexation became a priority. The 1898 Joint Resolution annexed strategically located Hawaii during Spanish-American War, and the 1900 Hawaiian Organic Act officially made Hawaii a United States territory. Although many residents continued to disapprove of or resist United States governance during the early territorial years, Hawaii eventually became the fiftieth state in 1959.

Kakaako

The Kakaako district is situated between Honolulu and Waikiki on Oahu. The area long existed as swampland, and during the reign of King Kamehameha I, was used for fishing, landing canoes, producing salt, cultivating taro, and practicing religion. Although Honolulu Harbor experienced rapid growth through the 1800s, few lived in Kakaako during this time. In 1848 much of Hawaii's lands were turned over to private ownership in what was called the Great Mahele; the land in Kakaako became part of the Bernice Pauahi Bishop estate.

Kakaako's lack of development also led the area to become the location of a temporary smallpox quarantine hospital and settlement during a 1853 smallpox epidemic. By 1876 however, a government map of Oahu labeled the area as the "Kakaako Salt Works" with no major roads

passing through the area. Roads between Honolulu and Waikiki bypassed Kakaako to the north. The identification of leprosy in Hawaii during the mid-nineteenth century eventually led to the construction in 1881 of a lepers' hospital in Kakaako at what is now Coral Street and Ala Moana Boulevard. Aimed to keep leprosy infections at a minimum, the hospital was used largely to house suspected lepers and isolate them from the local population before being sent to the lepers' colony on Molokai. Acting as only a branch of its larger Kalihi operation, the hospital was closed in 1888, dismantled, and materials reused on Molokai.[5]

Maps indicate Kakaako was the location of an early immigration depot constructed prior to 1887, with a new immigration depot constructed near the former lepers' hospital in 1889.[6] Kakaako was also the location of a saluting battery constructed in 1887. The battery was later enlarged to become Fort Armstrong in 1907 which included the Battery Tiernon in 1911. Honolulu Iron Works also operated near Kakaako, establishing a presence in the mid-nineteenth century and operating until 1973. The iron works grew hand-in-hand with Hawaii's sugar industry, building machinery required for plantation operations. As the industry declined, so did the Honolulu Iron Works, eventually leading to its closure and complete demolition by 1982.[7]

Continued growth in Honolulu eventually forced Kakaako's transition from a sparsely populated industrial area into a densely populated residential and commercial district. Demand for land near Honolulu Harbor led to the filling and development of a shallow reef adjacent to Kakaako, expanding the land comprising Kakaako. Eventually, large tracts of Kakaako land held by the Bishop and Curtis Perry Ward estates were subdivided. With the Honolulu Iron Works and Hawaiian Tuna Packers establishing businesses in Kakaako, other small enterprises soon followed. Residents arrived quickly. Hawaiian, Japanese, Portuguese, Filipino, and Puerto Rican families all found a home in Kakaako. Largely residing within their own housing "camps," these varied cultural groups lived and worked side-by-side in Kakaako, creating what has been referred to as a microcosm of Hawaii.[8]

Originally located at the site of the current Hawaii State Public Library, the Pohukaina School for Girls relocated to Kakaako in 1913. The new school was viewed as centrally located for its students and provided more space for buildings and playgrounds. Over time, the school became a special education facility and later closed in 1980.[9]

By the mid-twentieth century, however, Kakaako's population began to decline as residential areas slowly transitioned to Kakaako's current industrial uses. The area also fell into disrepair, and efforts were made by the Hawaii Community Development Authority (HCDA) to improve

[5] Cultural Surveys Hawaii, Inc., Final Archaeological Assessment of the Proposed Halekauwila Place Project, Kakaako, Honolulu District, Oahu Island (Kailua, HI: 2009).
[6] Oahu Government Survey 1876, Registered Map No. 1380 (Hawaii Land Survey Division); Wall, W. A., Honolulu and Vicinity 1887, Hawaiian Government Survey (Library of Congress).
[7] Cultural Surveys Hawaii, Inc., Final Archaeological Assessment (2009).
[8] Marsha Gibson, *Kaka'ako As We Knew It* (Honolulu: Mutual Publishing, 2011).
[9] Cultural Surveys Hawaii, Inc., Final Archaeological Assessment (2009).

roadway infrastructure within Kakaako, including realignment of Halekauwila Street.[10] Future plans for Kakaako include increased residential housing units, repopulating an area that was once a thriving community.

The Playground Movement

Beginning on the United States mainland during the late nineteenth century, the playground movement developed out of concern for the poor, aiming to help shape children and young adults into law-abiding citizens. Hired playground directors organized activities at the playgrounds and instilled a sense of order to the parks. This early urban reform movement was also seen as a means to help recent immigrants assimilate into American culture. The earliest playgrounds were developed by private investors who built these spaces for public use in the 1880s. In the following decades, cities took a greater role in providing public playgrounds and recreation areas for their residents. In 1906 the Playground Association of America was formed to promote physical and mental well-being through playgrounds across the country. The organization sent members to assess select cities' particular recreational needs. By the 1930s, many cities had created full-fledged recreation departments to deal with recreation management and operations.

Playgrounds were not places where children played freely on their own. Play existed for healthy development, and also as an educational tool that required organization and supervision. Thus, playground directors were employed to monitor the children's activities and acted as role models. The directors helped organize team games, scheduled activities, and restricted playground access to bullies. Through their various activities, playgrounds and recreation centers were seen as alternative choices to youth gangs, delinquency, or wasted time.[11]

Following World War II, the playground movement largely ceased, as child development experts began recommending unstructured play as more beneficial to child development. Supervised play at parks and playgrounds as it existed prior to the war subsequently ended.

Playground Movement in Honolulu

Honolulu's public playground development followed the national pattern and was promoted early on by the women leaders of the Free Kindergarten and Children's Aid Association. The group established the first public playground in Chinatown at Beretania and Smith streets in 1911. This playground was followed by Kamamalu and Atkinson parks in 1916 and Aala Park in 1917. Over the years, the organization functioned as Honolulu's de facto recreation department until the city's Recreation Commission was created in 1922 through the efforts of Henry Stoddard Curtis. Curtis, a former secretary of the Playground Association of America, surveyed Honolulu and urged the city to create new parks and playgrounds. His 1915 book

[10] State of Hawaii, et al., *Final Supplemental Environmental Impact Statement for the Kakaako Community Development District Plan* (Honolulu: Hawaii Community Development Authority, 1985); Austin, Tsutsumi, and Associates, Inc., *Kakaako Traffic Study* (Honolulu: Hawaii Community Development Authority, 1991).
[11] Robert R Weyeneth and Ann K. Yoklavich, *1930s Parks and Playgrounds in Honolulu: an Historical and Architectural Assessment* (Honolulu: Department of Parks and Recreation, 1987).

Education though Play played an influential role nationwide emphasizing the inherent social value playgrounds and parks played in the lives of the country's children. Curtis also suggested a park on the Kalia wetlands; this would later become Ala Moana Park.

Honolulu established a park board in 1931, hired Harry Sims Bent as park architect in 1933, and by 1936, forty playgrounds and social centers had been built and were supervised by the Recreation Commission. Because the idea of supervised and organized play was fairly new, the Commission published a guide in the 1930s aimed at explaining the concept to its playground directors and the public at large. Along with physical exercise, playgrounds and parks provided a means for mental exercise, team-building, and a desire to "strive for high ideals."[12]

Following World War II, in 1946 Honolulu's Parks Board merged with the Recreation Commission to form the Board of Public Parks and Recreation. The new board was tasked with rehabilitating Oahu's damaged parks.[13] By the end of the 1940s, American playgrounds began turning their focus to playground equipment aimed at promoting free play and imagination rather than supervised play as had been supported by recreation leaders during the previous two decades.[14]

New Deal Involvement in Playground Construction

Much of Honolulu's explosive growth in park, playground, and recreational facilities, including Mother Waldron Playground, can be attributed to increased federal assistance from New Deal programs in response to the Great Depression. Both the Federal Emergency Relief Administration (FERA) and the Civil Works Administration (CWA) provided manpower for Honolulu's park construction initiative. The National Youth Administration (NYA) allowed Honolulu to employ playground directors, while additional manpower, including that used to construct Mother Waldron Playground, was provided by the Works Progress Administration (WPA).

The WPA was established in 1935 as part of Franklin D. Roosevelt's New Deal policies. Lasting for eight years, WPA aimed to create labor-intensive projects with low-cost materials. "Small useful projects" as Executive Order 7034 stated, described the purpose of the WPA. No WPA requirements existed for local project financing, but in 1936, project sponsors averaged about 10% of the costs, and by the 1940s, that number had increased to 30%. In Honolulu, local funding accounted for 64% of the total cost of Mother Waldron Playground, with the WPA providing the remaining amount in addition to labor.[15]

[12] Ibid.
[13] Ann K. Yoklavich, *Overview of Historic Honolulu Parks* (Honolulu: Department of Parks and Recreation, 1987), 4.
[14] Susan G. Solomon, *American Playgrounds: Revitalizing Community Space* (Lebanon, NH: University Press of New England, 2005), 22.
[15] Honolulu Star-Bulletin, "Playground to Open Monday" September 13, 1937.

Early on, WPA projects focused on infrastructure needs like roads, electricity in rural areas, water, sanitation, and flood control. The 1936 Emergency Relief Appropriations Act added new categories that included public buildings, parks, public utilities, airports, and transit facilities, as well as educational, professional, and women's projects. WPA was prohibited from building on private property and was required to make sure its projects did not become private property.

The WPA's projects varied and included promenades, band shells, parks, waterfront areas developed for recreation, and multi-use recreation centers. During its existence, the WPA added 1,668 parks and improved some 6,524 existing parks, built 900 swimming pools, 9,300 recreational buildings and gymnasiums, 1,200 skating rinks, and 12,800 playgrounds. Across the country, Americans enjoyed the results of this program for decades.[16]

Harry Sims Bent

Harry Sims Bent, Mother Waldron Playground's architect, was born in Socorro, New Mexico, in 1896. After graduating from the University of Pennsylvania, Bent began his career working for the prominent New York architectural firm of Bertram Goodhue Associates. Bent's early work consisted primarily of building projects in the Los Angeles, California area, including the Los Angeles Central Library and several buildings at the California Institute of Technology (CalTech).

In the late 1920s Bent arrived in Honolulu assigned the task of supervising construction of the Academy of Arts as a representative and "resident architect" from Bertram Goodhue Associates. Following the Academy of Art's completion, Bent remained in Hawaii, first acquiring work through Bertram Goodhue Associates then later for his own independent practice.

Bent originally volunteered his time working on plans for the Honolulu Park Board in the early-1930s, and ultimately worked on nearly all projects undertaken by the Board through 1939. He was considered one of the most talented architects in Hawaii in the late 1920s-1930s, with Bertram Goodhue Associates and independent works including the C. Brewer Building, Hanahauoli School, the Pineapple Research Institute at the University of Hawaii at Manoa, and several residences. [17]

Bent's first task for the Honolulu Park Board was the Ala Moana Park project in 1933. The park's designed features included the canal bridge, entrance portals, sports pavilion, banyan court, and lawn bowling green. Other Bent park projects included Mother Waldron Playground, Kawananakoa Playground, Ala Wai Clubhouse, the Haleiwa Beach Park structures, and the Lanakila Park comfort station. Utilizing popular Art Moderne and Art Deco design elements, he aimed to create a modern look for his park work, a break from typical park and playground design. Bent incorporated these contemporary design aesthetics into his park plans, while earlier, non-Bent playground examples addressed the functional aspects of play.

[16] Leighninger, Robert D., Jr., *Long-Range Public Investment: The Forgotten Legacy of the New Deal*, Columbia, SC: University of South Carolina Press (2007).
[17] Steve Salis, "Playful Architecture," *Hawaii Architect* (June 1985): 12-13.

Bent returned to the mainland around 1940, and settled in Pasadena, California, where he continued his landscape design work. Major works during his post-Hawaii period included the landscape plan for Hancock Park in Los Angeles and the master plan for the Los Angeles County Arboretum. Bent died in Pasadena on March 19, 1959.

Margaret "Mother" Waldron

Margaret "Mother" Waldron was born on August 12, 1873, in Honolulu of mixed Hawaiian and Irish heritage. Her career began at Pohukaina School where she taught the fourth grade. Mother Waldron's time outside of school was spent as a volunteer playground director at Atkinson Park, formerly located southwest of Mother Waldron Playground, and as a welfare worker in Kakaako. Her duties included coaching boys' football and baseball and teaching girls and women household duties and jam-making.

For her fiftieth birthday, the boys and girls of Kakaako gave Mother Waldron a pin bearing the word "mother." The pin became Mother Waldron's most prized possession. Mother Waldron was credited with nearly single-handedly ridding Kakaako of its gangs and turning their members into model citizens through her organized activities for the district's youth. She helped transform the district's unpleasant reputation and would be greeted with "Aloha Mother" throughout Kakaako.[18]

Margaret Waldron died at St. Francis Hospital on May 8, 1936, and was buried on May 10, Mother's Day that year, in Nuuanu Cemetery.[19]

Mother Waldron Playground

Mother Waldron Playground was originally a 1.76 acre site bounded by Coral, Halekauwila, and Pohukaina streets and Lana Lane on a parcel that the 1914 Sanborn Fire Insurance map noted contained the City and County Stables. Honolulu acquired the parkland in 1930 and 1931 through purchases and deeds from the Territory of Hawaii. After several years, the Park Board approved and implemented Harry Sims Bent's plans for the playground in 1936. WPA labor was used to construct the park and concrete bricks were the chosen material. The choice of concrete brick by Bent contrasted with his earlier use of "boulder concrete," a concrete he employed at Ala Moana Park and later Haleiwa Beach Park that relied on larger rubble and coral to decrease the amount of cement required.[20]

The site of the future playground was proposed to be named in 1930 for Margaret "Mother" Waldron, but she refused the honor.[21] Her name was given to the park following her death in 1936. Costing approximately $50,000 to construct, Mother Waldron Playground opened

[18] "Guava Class at Kakaako is Waldron Plan," *Honolulu Star-Bulletin*, February 27, 1930, 4.
[19] "Death Claims Mrs. Waldron, Friend of Poor," *Honolulu Advertiser*, May 8, 1936, 1.
[20] Salis, "Playful Architecture," 12-13.
[21] "Playground Given Name of Pioneer," *Honolulu Advertiser*, February 19, 1930, 1.

September 20, 1937 to much fanfare, including a performance by the Royal Hawaiian Band.[22] Although the playground was separated by Coral Street from the nearby Pohukaina School, during recess children at the school were allowed to play at the park.

For the Kakaako community, Mother Waldron Playground played a much greater role. Each July, a *Bon* Dance would be held at the playground. Although the *Bon* Dance was a festival for Buddhists honoring deceased relatives, the entire Kakaako community would participate. Festivals like the *Bon* Dance were held continually at Mother Waldron Playground, providing a central location for socializing and entertainment in the Kakaako community. The playground also hosted a number of political rallies usually accompanied by musicians, bands, and hula dancers.[23]

Original Appearance of Mother Waldron Playground

Bent planned the playground following his successful design features at Ala Moana Park, implementing contemporary design elements reflecting the Art Moderne style. The symmetrical playground, situated in a dense residential, commercial, and industrial area, was designed to emphasize utility as well as beauty. Bent used concrete bricks to construct Mother Waldron Playground's walls, benches, and comfort station.

A perimeter wall delineated the playground boundaries along Coral, Pohukaina, and Halekauwila streets and Lana Lane. The wall contained horizontal and vertical perforated openings and was comprised of several brick courses, with some courses recessed to create horizontal bands. Each of the park's corners contained a convex curve entry with rounded piers anchoring the walls' ends. Along Coral Street, the wall was executed in a triangular zig-zag form and opened to Coral Street, while Halekauwila and Pohukaina streets provided squared zig-zag walls. Lana Lane's wall was straight and contained no horizontal bands or perforations. The entire perimeter wall was topped by recessed concrete coping with alternating straight and zig-zag edges.

Laid out symmetrically, the park's northeast end was to be used by younger children while the southwest end was to be used by older children. An oval, grassy area and comfort station divided the two halves at the playground's center. The park utilized an Art Moderne style that was increasing in popularity during the time, yet seldom used for parks and playgrounds. Both sides contained volleyball, basketball, and shuffleboard courts. The northeast end contained swings and seesaws, while the southwest end contained handball courts.

Bent's central Art Moderne feature was a comfort station that employed a streamlined and unornamented facade, rounded corners and columns, and covered walkways curving away from the comfort station. The comfort station contained men's and women's restrooms, drinking fountains at the entrances of both restrooms, and changing areas inside. At the comfort station's center, a raised and rounded platform provided an outdoor stage area with a pilaster-lined alcove

[22] "Waldron Playground—Kakaako Beauty Spot," *Honolulu Advertiser*, September 20, 1937, 5; "Playground to Open Monday," *Honolulu Star-Bulletin*, September 13, 1937, 12; "$50,000 Mother Waldron Park Officially Opened," *Honolulu Advertiser*, September 21, 1937, 1.
[23] Gibson, *Kakaako As We Knew It*, 85-87.

backdrop. The stage, its surrounding area, and floor beneath the covered walkway were paved with the same sandstone flagstone found at the park's Coral Street entrance.

Concrete brick park benches capped with terracotta tile are located within the perimeter wall in alcoves created by the wall's zig-zag as well as in the middle of each play area. Most benches are straight, but the benches along the Coral Street wall curved to fit their alcoves. An additional low wall topped with terracotta was located beneath the comfort station's covered walkway, running parallel to the higher wall along Lana Lane. Trees were planted in openings created by the perimeter wall's zig-zag, providing shade to the park's users.[24]

Mother Waldron Playground's Use of Contemporary Architectural Styles

Harry Sims Bent's design for Mother Waldron Playground reflected heavy influence from the streamlined Art Moderne style popular at the time. Art Moderne was characterized by horizontal lines, flat roofs, smooth surfaces, and curvilinear edges. The Art Moderne movement, popular from the 1930s through 1940s, and its counterpart, Art Deco, popular from the 1920s through 1940s , were seen as a rejection of classical architectural themes. Unlike Art Moderne's emphasis on horizontality, Art Deco utilized vertical lines and geometric patterns. Both design styles embraced architectural elements deemed appropriate for the modern era. Bent was inspired by these national architectural trends, and desired to create a playground that was viewed as a contemporary design expression, moving beyond mere utility.[25] Mother Waldron Playground presents a local, vernacular interpretation of these styles.

Changes to Mother Waldron Playground

According to the 1988 Hawaii Register of Historic Places nomination form that included Mother Waldron Playground, renovations were made to Mother Waldron Playground's comfort station in 1968. The form did not state the extent of the renovations, but a visual inspection indicated that no substantial alterations had occurred, as many original features and finishes remained intact. Additionally, the Department of Parks and Recreation resurfaced the playground in 1978.[26] In 1991-1992, Halekauwila Street was realigned through Mother Waldron Playground, removing approximately 12,700 square feet of the original park's northeast end and a small portion along Pohukaina Street. To mitigate this taking, the city added approximately 54,000 square feet of Mother Waldron Playground and removed Lana Lane which greatly enlarged the park. The expansion included extending the park southeast of downtown Honolulu, removing the park's boundary wall along Lana Lane, and reconstructing the park's perimeter walls along Halekauwila and Pohukaina streets.[27] In 1994-1995, Coral Street was closed between Halekauwila and Pohukaina streets and right-of-way included in the expansion of Mother Waldron Playground, which added approximately 25,800 square feet to the park. These

[24] Research did not provide the specific varieties of trees originally planted at Mother Waldron Playground.
[25] Weyeneth and Yoklavich, *1930s Parks and Playgrounds in Honolulu,* 16.
[26] Mother Waldron Playground, City & County of Honolulu Art Deco Parks Hawaii Register of Historic Places nomination form, April 20, 1988.
[27] See above Architectural and Landscape Description: Alterations.

additions are now considered non-contributing sites within the greater Mother Waldron Playground site. The surrounding neighborhood's transition to light industrial uses provides little context for the playground, as proximate buildings are not original to the park's construction era.

Prior Documentation of Mother Waldron Playground

Mother Waldron Playground was listed in the Hawaii Register of Historic Places on June 9, 1988, as an element of the thematic group "City & County of Honolulu Art Deco Parks," prior to the extensive 1990s changes.

The playground was documented on a Determination of Eligibility form by Mason Architects, Inc. in 2008. This documentation assessed the property as eligible for listing in the National Register under Criteria A and C and the Hawaii State Historic Preservation Division (SHPD) concurred with this finding.

This nomination has been produced as part of the legal requirements in the *Programmatic Agreement Among the U.S. Department of Transportation Federal Transit Administration, The Hawaii State Historic Preservation Officer, The United States Navy, and the Advisory Council on Historic Preservation Regarding the Honolulu High-Capacity Transit Corridor Project in the City and County of Honolulu, Hawaii*.[28]

Information produced from research conducted for this nomination revealed that substantial changes had occurred in the playground in the 1990s which were not described in the 2008 Determination of Eligibility form. This nomination considers those changes.

Significance Evaluation

Mother Waldron Playground is eligible for the National Register of Historic Places under Criterion A for its association with the national playground movement, which aimed to provide supervised play and character-molding opportunities. The property correlates with the rise of playground construction in urban areas throughout the United States.

Mother Waldron Playground is not eligible under Criterion B. Although the park is named in honor of Margaret "Mother" Waldron, the property is not associated with her productive life or her lasting contributions to the Kakaako community.

This property is also eligible under Criterion C for its architectural and landscape design by Harry Sims Bent. The property displays a streamlined Art Moderne appearance with some Art Deco elements, a modern approach and a display of Harry Sims Bent's desire to create a pleasing environment for park users. Contributing features to Mother Waldron Playground include the

[28] *Programmatic Agreement Among the U.S. Department of Transportation Federal Transit Administration, The Hawaii State Historic Preservation Officer, The United States Navy, and the Advisory Council on Historic Preservation Regarding the Honolulu High-Capacity Transit Corridor Project in the City and County of Honolulu, Hawaii*, (January 2011).

remaining original Art Moderne playground site and the streamlined comfort station building. Non-contributing features include an approximately 1.5 acre site which nearly doubled the size of the remaining Mother Waldron Playground original site as well as the former Coral Street area. These non-contributing sites became an extension of Mother Waldron Playground following Halekauwila Street improvements in 1991-1992 and continued Kakaako district improvements made from 1994-1995. Still, the retention of the playground's prominent Bent-designed features, including the zig-zag wall and comfort station, allows Mother Waldron Park to remain eligible under Criterion C.

In addition, the property retains its original historic function. The period of significance for Mother Waldron Playground spans from its construction date in 1937 through 1945, when supervised play largely ceased and Honolulu's Board of Parks and Recreation was formed to rehabilitate Oahu's parks after World War II.

Social History

Mother Waldron Playground is associated with the playground movement across the United States and Honolulu's need for recreational facilities within urban areas. Playgrounds were viewed as a means to reform urban youth and help create law-abiding citizens through structured play.

Entertainment/Recreation

Mother Waldron Playground provided recreational facilities for urban youth. Park employees did not allow children to play freely. Instead, accepted views of recreation at the time required organized play for children to be overseen by a playground director.

Architecture and Landscape Architecture

Mother Waldron Playground is an example of Harry Sims Bent's architecture and landscape architecture work. At the time, Bent acted as the Honolulu Park Board's chief designer, planning parks and playgrounds throughout the 1930s. His Art Moderne with Art Deco designs represented a modern approach for Mother Waldron Playground. Bent's design fulfilled the needs required for "organized play" by dividing the park into two halves for different age groups and also providing a comfort station for users. The park demonstrates Bent's desire to create a functional yet aesthetically pleasing urban playground.

Period of Significance

The period of significance for Mother Waldron Playground spans from 1937, when construction commenced, until 1945, when the playground movement that supported supervised play largely ceased and Honolulu's Board of Parks and Recreation was formed to rehabilitate Oahu's parks following World War II.

Integrity Evaluation

Mother Waldron Playground retains a moderate level of integrity of location. Original portions of the playground remain in place, but other areas originally associated with the playground are no longer part of the site, and other areas not historically part of the playground have been added. The playground has a low level of integrity of materials, design, and workmanship. Halekauwila Street's realignment and the widening of Pohukaina Street have compromised the park's design, removing over 12,700 square feet of the original park boundaries and demolishing and replacing original features, diminishing the integrity of workmanship and materials. However, although many original features of the park have been removed and replaced, the playground retains a modest amount of original features, including most of the zig-zag wall and the comfort station, to demonstrate a low integrity of materials and workmanship. Mother Waldron Playground does not retain integrity of setting outside of the park; within the park open spaces and a general playground appeal contribute to a moderate level of integrity of setting. The Kakaako area has transitioned over time from a mix-use commercial and residential district to a largely industrial area. Mother Waldron Playground is now surrounded by these industrial uses. Mother Waldron Playground retains its integrity of feeling as an Art Moderne-designed playground and its integrity of association with the early-1900s playground movement. Therefore, the playground retains integrity of feeling and association.

9. Major Bibliographical References

Bibliography (Cite the books, articles, and other sources used in preparing this form.)

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Weyeneth, Robert R., and Ann K. Yoklavich. *1930s Parks and Playgrounds in Honolulu: an Historical and Architectural Assessment*. Honolulu: Department of Parks and Recreation, 1987.

Previous documentation on file (NPS):

____ preliminary determination of individual listing (36 CFR 67) has been requested
____ previously listed in the National Register
____previously determined eligible by the National Register
____designated a National Historic Landmark

____ recorded by Historic American Buildings Survey #_____
____recorded by Historic American Engineering Record # _____
____ recorded by Historic American Landscape Survey # _____

Primary location of additional data:

____ State Historic Preservation Office
____ Other State agency
____ Federal agency
____ Local government
____ University
____ Other
Name of repository: _____

Historic Resources Survey Number (if assigned): _____

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10. Geographical Data

Acreage of Property 3.76

Use either the UTM system or latitude/longitude coordinates

Latitude/Longitude Coordinates
Datum if other than WGS84:_____
(enter coordinates to 6 decimal places)

1. Latitude: 21.299251 Longitude: -157.858407
2. Latitude: Longitude:
3. Latitude: Longitude:
4. Latitude: Longitude:

Or
UTM References
Datum (indicated on USGS map):

☐ NAD 1927 or ☐ NAD 1983

1. Zone: Easting: Northing:

2. Zone: Easting: Northing:

3. Zone: Easting: Northing:

4. Zone: Easting : Northing:

Verbal Boundary Description (Describe the boundaries of the property.)

See Map Attachment

Boundary Justification (Explain why the boundaries were selected.)

Mother Waldron Playground's boundary includes the entire area presently called Mother Waldron Playground. This footprint includes a portion of the original playground, its southeast expansion, and the former Coral Street right-of-way between Halekauwila and Pohukaina streets. Although the playground's size was altered in the 1990s, these changes did not affect the playground's use as a public playground. This boundary corresponds to the boundary concurred to by the Hawaii State Historic Preservation Division in an earlier 2008 eligibility assessment, despite 1990s changes to the playground.

The boundary encompasses all of the remaining original resources and features that comprise the property, as well as more recent additions. The National Register boundary has been prepared in accordance with guidelines established by the National Register Bulletin, "Defining Boundaries for National Register Properties."[29]

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11. Form Prepared By

name/title: G. Blanchard/Cultural Resources Team
organization: Honolulu Authority for Rapid Transportation
street & number: 1099 Alakea Street, 17th Floor
city or town: Honolulu state: Hawaii zip code: 96813
e-mail:
telephone: (808) 566-2299
date: 2/1/2013

[29] National Park Service, *National Register Bulletin: Defining Boundaries for National Register Properties* (Washington, D.C.: United States Department of the Interior, 1997).

Additional Documentation

Submit the following items with the completed form:

- **Maps:** A **USGS map** or equivalent (7.5 or 15 minute series) indicating the property's location.

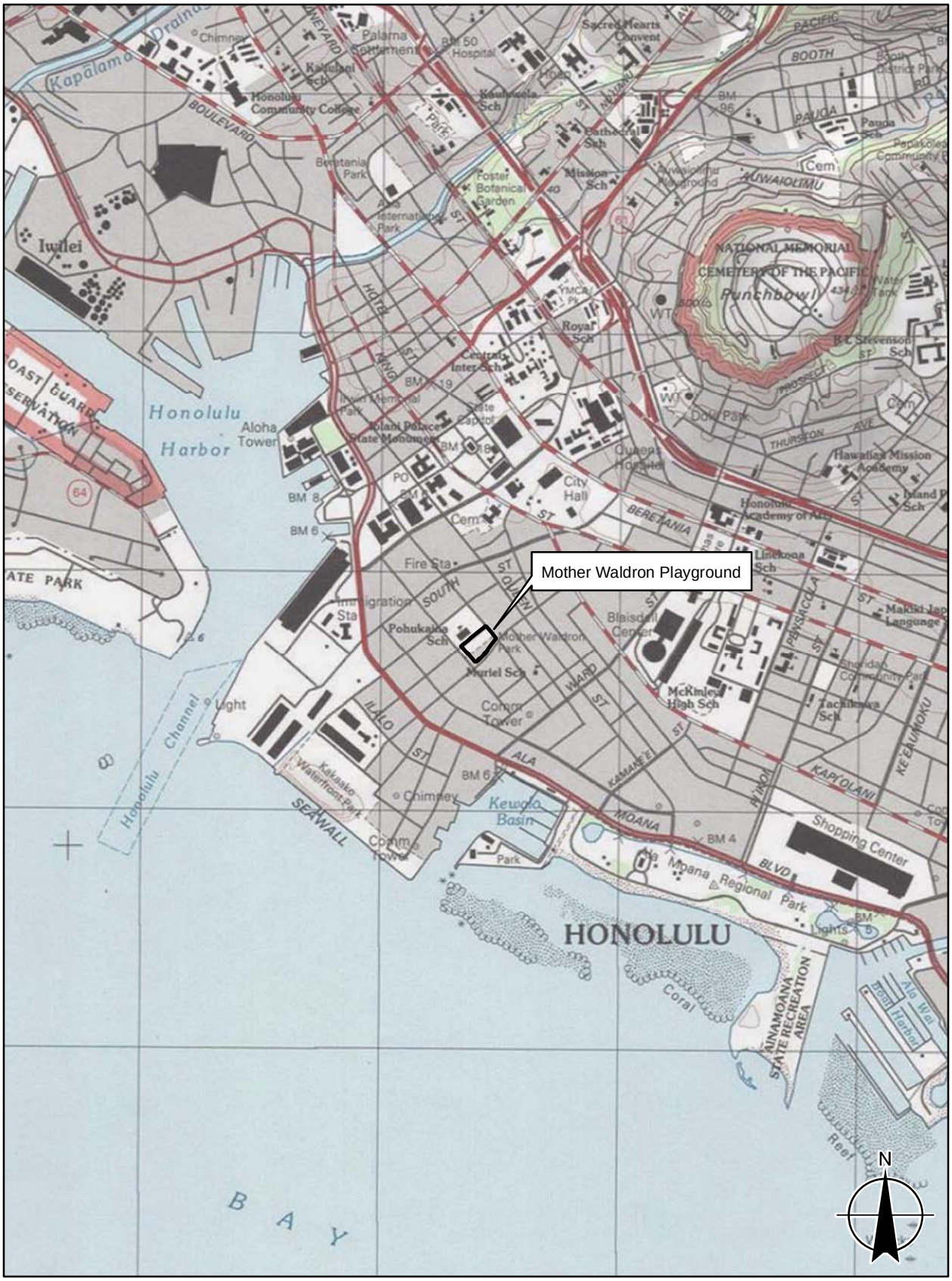
- **Sketch map** for historic districts and properties having large acreage or numerous resources. Key all photographs to this map.

- **Additional items:** (Check with the SHPO, TPO, or FPO for any additional items.)

  -Plan of Mother Waldron Playground, 1973

  -USGS aerial photograph of Mother Waldron Playground and vicinity, 1952

Mother Waldron Playground

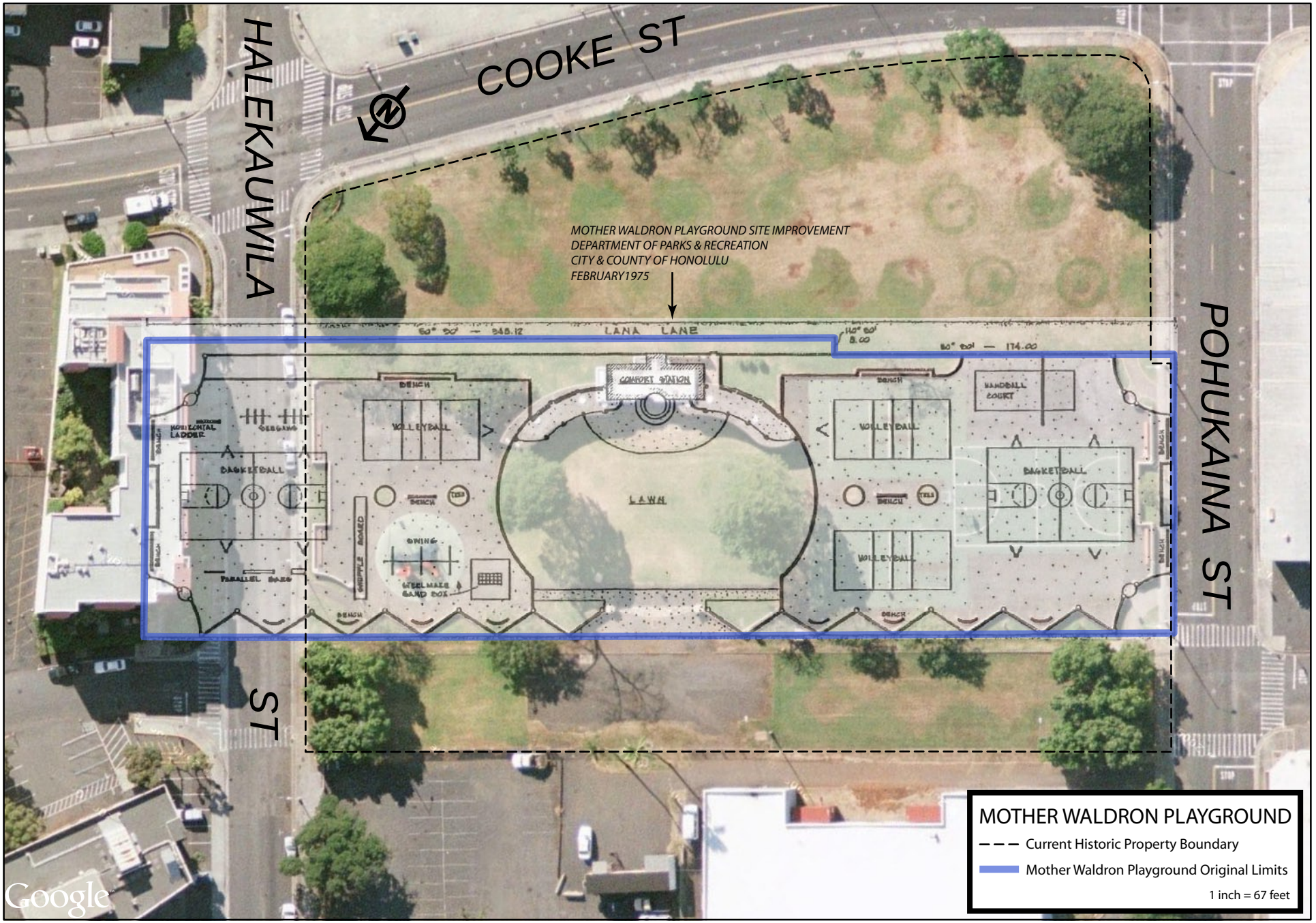


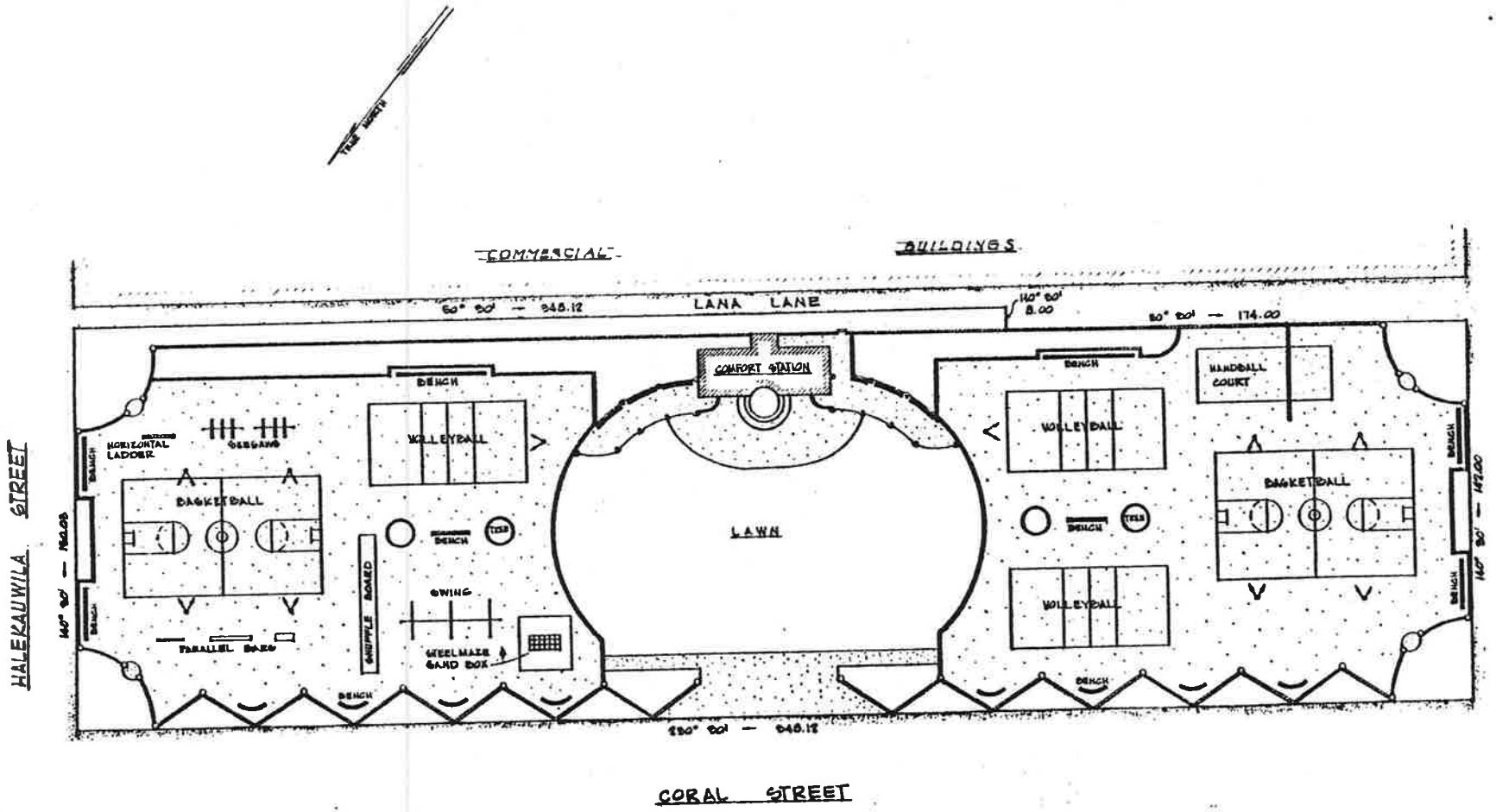
USGS Honolulu Quad, 1998

Property Boundary

1,000 Feet

1:24,000


COOKE ST
HALEKAUWILA
ST
POHUKAINA ST
MOTHER WALDRON PLAYGROUND SITE IMPROVEMENT
DEPARTMENT OF PARKS & RECREATION
CITY & COUNTY OF HONOLULU
FEBRUARY1975
LANA LANE
COMFORT STATION
LAWN
BASKETBALL
VOLLEYBALL
HANDBALL COURT
SWING
SEESAW
PARALLEL BARS
SHUFFLE BOARD
BENCH
MOTHER WALDRON PLAYGROUND
Current Historic Property Boundary
Mother Waldron Playground Original Limits
1 inch = 67 feet
Google



	7/1/84	UPDATED IMPROVEMENTS	SIPC

DEPARTMENT OF PARKS & RECREATION
CITY & COUNTY OF HONOLULU

MOTHER WALDRON PLAYGROUND
SITE IMPROVEMENT

DRAWN BY: G.Z. / DESIGNED BY: / DATE: 2/1976

RECOMMENDED BY:

DIST. 11
SHT. 1 OF 1
FILE NO.

TAX MAP KEY: 2-1-51-5

USGS aerial photograph of Mother Waldron Playground and vicinity, 1952.

Photographs

Submit clear and descriptive photographs. The size of each image must be 1600x1200 pixels (minimum), 3000x2000 preferred, at 300 ppi (pixels per inch) or larger. Key all photographs to the sketch map. Each photograph must be numbered and that number must correspond to the photograph number on the photo log. For simplicity, the name of the photographer, photo date, etc. may be listed once on the photograph log and doesn't need to be labeled on every photograph.

Photo Log

Name of Property: Mother Waldron Playground

City or Vicinity: Honolulu

County: Honolulu State: Hawaii

Photographer: Charles Greenleaf

Date Photographed: 11/17/2012

Description of Photograph(s) and number, include description of view indicating direction of camera:

1 of 8. View south toward Mother Waldron Playground from Halekauwila Street and Coral Street into original playground area

2 of 8. View north from Pohukaina Street and the former Lana Lane into original playground area

3 of 8. View northeast from wall along Pohukaina Street into original playground area

4 of 8. View southwest from Halekauwila Street and 1991-1992 expansion area toward original playground area

5 of 8. View north from Pohukaina Street toward original playground area and its former handball court

6 of 8. View northeast from Pohukaina Street toward original playground area and 1991-1992 expansion area

7 of 8. View northeast toward comfort station

8 of 8. View east toward comfort station from original playground entrance at Coral Street

Paperwork Reduction Act Statement: This information is being collected for applications to the National Register of Historic Places to nominate properties for listing or determine eligibility for listing, to list properties, and to amend existing listings. Response to this request is required to obtain a benefit in accordance with the National Historic Preservation Act, as amended (16 U.S.C.460 et seq.).
Estimated Burden Statement: Public reporting burden for this form is estimated to average 100 hours per response including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding this burden estimate or any aspect of this form to the Office of Planning and Performance Management. U.S. Dept. of the Interior, 1849 C. Street, NW, Washington, DC.

Photo 1.

Photo 2.

Photo 3.

Photo 4.

Photo 5.

Photo 6.

Photo 7.

Photo 8.