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May 23, 2012

Hallett H. Hammatt, Ph.D.  
Cultural Surveys Hawai'i, Inc.  
P.O. Box 1114  
Kailua, Hawaii 96734

LOG NO: 2012.1449  
DOC NO: 1205NN23

Dear Dr. Hammatt:

Subject: **National Historic Preservation Act (NHPA) Section 106 Consultation -  
Revised Archaeological Inventory Survey Report for Construction Phase 2  
Honolulu High-Capacity Transit Corridor Project  
Waiawa, Mānana, Waimano, Waiau, Waimalu, Kalauao, 'Aiea, & Hālawā Ahupua'a,  
'Ewa District, Island of O'ahu  
TMK: (1) 9-7, 9-8, 9-9 Various Plats and Parcels**

Thank you for the opportunity to review this report titled *Archaeological Inventory Survey for Construction Phase 2 of the Honolulu High-Capacity Transit Corridor Project, Waiawa, Mānana, Waimano, Waiau, Waimalu, Kalauao, 'Aiea and Hālawā 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), which our office received on September 9, 2012. This report was prepared for Parsons Brinckerhoff, Inc. on behalf of the City and County of Honolulu and the Federal Transit Administration. We have previously provided comments on the archaeological inventory survey plan (Log 2010.1748, Doc 1005NM14), draft archaeological inventory survey (Log 2012.0966, Doc 1205NN02) and the archaeological monitoring plan for this project (Log 2012.1041, 1205NN12). Revisions requested in our prior review of the draft inventory survey have been addressed in this revised report, as indicated below (in summary):

1. The test trench stratigraphy descriptions for Trenches E7, E13, E16, and PRS1 have been expanded to clarify the distinctions made between fill layers, culturally sterile natural layers and possible lo'i or fishpond deposits. In addition, difference between overlying fill layers and underlying natural strata was made.
2. Three test trenches were initially proposed for the *mauka* portion of the Pearlridge Transit Station (TMK [1] 9-8-010:002), but land access onto the property was not permitted. According to the revised AIS report, the City and County of Honolulu obtained ownership of this parcel from 50<sup>th</sup> State Properties, and Cultural Surveys Hawaii can now complete its three test trenches as part of a supplemental archaeological inventory survey. The supplemental archaeological inventory survey will be conducted prior to the beginning of construction activities. The results of the supplemental archaeological inventory survey will be reported in a supplemental archaeological inventory survey addendum to this approved archaeological inventory survey report.
3. Lastly, provisions of the archaeological monitoring program has been removed from the revised AIS report and was included an archaeological monitoring plan, which has been approved.

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As indicated in our prior letter, one newly identified historic property (SIHP Site 50-80-09-7150) was identified within Trench E-7, located along Kamehameha Highway, midway between Kuleana Road and Ka'ahumanu Street. This location is in a documented area of former ponded taro fields (LCA#9385). We concur that this site is significant under National Register of Historic Places and Hawaii Register of Historic Places Criterion D, and has the potential to yield information important for understanding prehistory. We concur with the proposed mitigation measures, which is on-site monitoring of any land alteration activities in the vicinity of the site area.

This revised report meets the requirements of HAR 13-276 and *The Secretary of Interior's Standards for Identification and Evaluation*, and 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 on CD to the Kapolei SHPD office. Please contact Deona Naboia at (808) 692-8015 or [Deona.Naboia@Hawaii.gov](mailto:Deona.Naboia@Hawaii.gov) if you have any questions or concerns regarding this letter.

Aloha,



Theresa K. Donham  
Archaeology Branch Chief