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April 1, 2015

Mr. Jon Nouchi
Deputy Director of Planning & Environmental
City and County of Honolulu
Alii Place, 17th Floor
1099 Alakea Street
Honolulu, Hawaii 96813

LOG NO: 2015.01120
DOC NO: 1503SL19
Archaeology,
History and Culture

Dear Mr. Nouchi:

SUBJECT: Chapter 6E-8 and National Historic Preservation Act (NHPA) Section 106 Review – Supplemental Archaeological Inventory Survey Report for the City Center (Section 4) of the Honolulu Rapid Transit Project Kalihi, Kapālama, Honolulu, and Waikīkī Ahupua‘a Honolulu (Kona) District, O‘ahu TMK: (1) 2-3-002, 003, 004 various

Thank you for the opportunity to review the revised draft report titled *Supplemental Archaeological Inventory Survey Report for the City Center (Section 4) of the Honolulu Rapid Transit Project, Kalihi, Kapālama, Honolulu, and Waikīkī Ahupua‘a Honolulu (Kona) District, O‘ahu Addressing Changes from the Vicinity of Ward Avenue and Halekauwila Street to the Vicinity of Queen and Kamake‘e Streets TMK: [1] 2-3 (Various Plats and Parcels)* (Humphrey et al. 2015). We received this submittal on March 20, 2015.

The proposed Honolulu Authority for Rapid Transit (HART) project involves the use of federal funds provided by the Federal Highway Administration (FHWA) as well as the use of federal lands in Section 3 of the rail corridor. Thus, the Honolulu Rapid Transit Project (HRTTP) is a federal undertaking as defined by 36 CFR 800.16(y), requiring historic preservation review under Section 106 of the National Historic Preservation Act (NHPA), and compliance with the National Environmental Policy Act (NEPA) and with Section 4(f) of the Department of Transportation Act (DTA). The FTA has determined that the project will have an adverse effect on historic properties currently listed, or eligible for listing, on the National Register of Historic Places (National Register). The Hawaii State Historic Preservation Officer (SHPO) concurred with the FTA's effect determination.

The City Center (Section 4) portion of the HRTTP extends from Kalihi Stream to Ala Moana Center within Tax Map Keys (1) 2-3-002, 2-3-003, and 2-3-004 various parcels. The City Center area of potential effect (APE) extends from Ward Avenue to Queen Street southeast of Kamake‘e Street, totaling 4.7 acres. The APE for archaeological cultural resources (historic properties) is defined in Stipulation II.A.I. of the final Programmatic Agreement (2011) as all areas of direct ground disturbance, totaling approximately 1.6 acres, including utility relocations.

The previous SHPD-accepted AIS-related reports for City Center (Section 4) are summarized as follows:

- AISP (Hammatt et al. 2011) - accepted October 25, 2011 (Log No. 2011.2379, Doc. No. 1110NN08);
- Addendum AISP (Hammatt et al. 2013) – accepted March 1, 2013 (Log No. 2013.1958, Doc. No. 1302SL28);
- AIS (Hammatt 2013) - accepted August 26, 2013 (Log No. 2013.2564, 2013.4338, Doc. No. 1308SL21); and
- Supplemental AISP (Humphrey and McDermott 2014) – accepted June 20, 2014 (Log No. 2014.02615, Doc. No. 1406SL22).

The Supplemental AISP for the current project was prepared to address the newly-proposed reconfiguration of the Kaka'ako Station and adjacent corridor alignment. The Supplemental AIS project area occurs within property owned by Howard Hughes Corporation on the eastern side of Ward Avenue, and along Queen Street on lands under the jurisdiction of the State of Hawaii, specifically the Hawaii Community Development Authority (HCDA). A subsurface cultural deposit, including an isolated human cranial fragment and six pits (SIHP 50-80-14-7429), was identified in seven of the AIS trenches excavated in proximity to the proposed Kaka'ako Station (Trenches T-167, T-168, T-168A, T-168B, T-169, T-170, and T-170A). The human cranial fragment was found in T-170. The Supplemental AISP proposed excavation of 14 trenches (T-162A, T-162B, T-162C, T-170B, T-171A, T-172B, T-173A, T-175B, T-175C, T-176A, T-177A, T-179A, T-180A, and T-181A). Of these, three were to investigate the touchdown footprint of the station and 11 were to test column locations.

Due to various issues and constraints, two of the original Supplemental AIS trench locations were abandoned (T-175B and T-176C), one was moved (T-172B), one was only partially excavated (T-181A), and three new trench locations were added (T-175D, T-176B, and T-177b). A single previously-identified historic property (SIHP #50-14-80-7429) was further exposed and documented. Site 7429 consists of two buried A horizons or cultural layers (designated Components 1 (post-Contact) and 2 (pre- and/or early post-Contact)) and 85 features, including 34 features associated with Component 1 and 44 features associated with Component 2. Component 1 represents nineteenth to early twentieth century land use which directly overlies and, in most cases, truncated the buried natural A horizon. Component 2 consists of a natural sandy A horizon that developed within a buried Jaucas sand dune deposit. Both cultural layers contain historic glass, ceramic, metal, wood, and stone domestic and architectural remains, as well as vertebrate and invertebrate remains, charcoal, fire-affected rock and minimal traditional Hawaiian artifacts. The 34 features identified within Component 1 consist of nine pits of indeterminate function, six in-filled postholes, five fire pits, four comprising isolated human skeletal remains, two human burials, two exhumation pits, remnants of a possible coffin, one animal burial, two 'auwai, one hearth, and one trash pit. The 51 features identified within Component 2 consist of 31 pits of indeterminate function, five fire pits, four midden pits, four human burials, two comprising isolated skeletal remains, three in-filled postholes, one ash lens, and a single manuport.

The revised boundaries of SIHP 7429 extend from the vicinity of Ward Avenue just Makai of the intersection with Queen Street (as documented by Hammatt 2013) to the intersection of Queen Street and Kamakee Street (as documented by the current Supplement AIS and by Hawkins et al. (2015) and Sroat et al. (2015)). SIHP was previously assessed as significant per Hawaii Administrative Rules (HAR) 13-275-6, Criteria "d" (have yielded, or may yield information important to prehistory or history) and "e" (has cultural significance to an ethnic group), and eligible for listing on the National Register of Historic Places per 36 CFR 60.4 under Criterion D (Hammatt 2013, Hawkins et al. 2015, Sroat et al. 2015). The Supplemental AIS results support the earlier site significance assessments and the National Register of Historic Places eligibility recommendations.

Under Chapter 6E, the project effect recommendation is "Effect, with agreed upon mitigation commitments," as the project may adversely impact SIHP 7429. The recommended mitigation per HAR 13-275-8(a)(1)(C) is mitigation in the form of archaeological monitoring. On-site archaeological monitoring is recommended for all ground disturbing activities to ensure identification and proper treatment of all subsurface non-burial and/or burial historic properties encountered during further project design and/or construction.

SHPD concurs with the site significance assessment for SIHP 7429, that the project effect under Chapter 6E is "Effect, with agreed upon mitigation measures, and with the previous NHPA Section 106 project effect determination of "Adverse Effect," and the agreed-upon mitigation condition of on-site archaeological monitoring. The City Center (Section 4) archaeological monitoring plan (Hammatt 2014) which includes the current Supplemental AIS project area was reviewed and accepted by SHPD on June 23, 2014 (Log No. 2014.02203, Doc. No. 1406SL23).

The revisions adequately address the issues and concerns identified in our earlier correspondence (February 13, 2015; Log No. 2014.05719, Doc. No. 1502SL18). This Supplemental AIS report meets the requirements specified in the *Secretary of the Interior's Standards for Archeological Documentation* and the requirements set forth in Hawai'i Administrative Rules §13-276-5. 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 on CD to the Kapolei SHPD office.

Mr. Nouchi
April 1, 2015
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Please contact Dr. Susan A. Lebo at (808) 692-8019 or at Susan.A.Lebo@hawaii.gov if you have any questions or concerns regarding this letter.

Aloha,

A handwritten signature in black ink, appearing to read "Alan S. Dower", followed by a long horizontal line extending to the right.

Alan S. Dower, PhD
Administrator, State Historic Preservation Division
Deputy State Historic Preservation Officer

cc: Matt McDermott, Project Manager, Cultural Surveys Hawaii, Inc. (mmcdermott@culturalsurveys.com)