

**KANEHILI CULTURAL HUI  
P.O. Box 75578 KAPOLEI, HI. 96707**

January 8, 2014

Mr. Ted Matley,  
Federal Transit Administration, Region 9  
201 Mission Street, Suite 2210  
San Francisco, Ca. 94105-1831

Michael Formby  
Department of Transportation Services  
City & County of Honolulu  
650 South King Street, Third Floor  
Honolulu, Hawaii

Paul Cleghorn  
Kako'o  
Pacific Legacy, Inc 30 Aulike Street, Suite 301  
Kailua, Hi. 96743

CC: Jon Y. Nouchi  
Deputy Director, Planning and Environmental  
Honolulu Authority for Rapid Transportation (HART)  
Honolulu, Hawaii

CC: Elizabeth Merritt, Attorney  
National Trust for Historic Preservation  
1785 Massachusetts Ave NW  
Washington, DC 20036

CC: Kiersten Faulkner, Executive Director  
Historic Hawai'i Foundation  
680 Iwilei Road, Suite #690,  
Honolulu, HI 96817

CC: Michael Kumukauoha Lee,  
Cultural Descendant  
Kanehili Cultural Hui

***RE: Honolulu High Capacity Transit Corridor Project Programmatic  
Agreement, Honolulu Hawaii***

***Stipulation IX Measures to Address Reasonably Foreseeable Indirect and  
Cumulative Effects Caused by the Project***

Dear Mr. Matley, Mr. Formby and Mr. Cleghorn:

Kanehili Cultural Hui (KCH) is a consulting party to the HART Programmatic Agreement (PA) for the Honolulu High Capacity Transit Corridor Project (Project), and has identified significant direct, indirect and cumulative effects on resources determined eligible for the National Register of Historic Places that was not evaluated in the PA.

#### Written Notification Per Stipulation IX and I.H.10

Pursuant to PA Stipulations IX and I.H.10, Kanehili Cultural Hui is providing this letter as notice to the Federal Transit Administration (FTA) and the PA Program Manager (Kako'o) of the significant adverse effects and requesting that FTA call a meeting of the consulting parties as soon as possible to discuss what next steps would be appropriate under the new circumstances to correct and mitigate the effects on the historic and cultural resources (IX.D).

#### Identification of Historic and Cultural Properties

The subject properties:

1. The underground wahi pana natural caves and tunnels within the Project.
2. The unidentified Traditional Cultural Properties within Honouliuli ahupua'a.
3. The correct location of the Leina a ka 'uhane within Honouliuli ahupua'a.
4. The 1825 Malden Map which identified important ancient Hawaiian trails within Honouliuli ahupua'a that are also identified in numerous further map editions up to 1878 and which are publically available at the Hawaii State Bureau of Conveyance.

#### Relevance to the Honolulu High-Capacity Corridor Project

The Project is directly threatening, impinging upon and very likely damaging these known important and documented historic traditional cultural properties and native Hawaiian cultural properties.

#### Stipulation to Address Reasonably Foreseeable Indirect and Cumulative Effects Caused by the Project

The 11<sup>th</sup> Whereas clause of the PA notes that “adverse effects may include reasonably foreseeable effects caused by the Project that may occur later in time, be farther removed in distance, or be cumulative;” and the 17<sup>th</sup>, 18<sup>th</sup>, 19<sup>th</sup> and 20<sup>th</sup> Whereas clauses reference transit oriented development as a specific issue relevant to the PA.

The Project in the Ahupua’a of Honouliuli, Moku of Ewa directly affects above ground and below ground traditional native Hawaiian cultural resources and further the Project directly encourages and sponsors massive primary and secondary impacts through three Transit Oriented Development (TOD). None of the three TOD’s would be located where they are on 1000 year old traditional native Hawaiian agricultural properties which supported the largest Oahu population prior to Western contact without the Project placing these three rail stations along the route.

The Project does not go to the communities of Ewa or Kapolei where the populations are but instead creates, encourages and sponsors an entirely new major population center to be called “East Kapolei” that speculates that vast numbers of new residents will live there. The Project never assessed the massive primary and secondary impacts of a major new population center being created on these Honouliuli traditional cultural properties and the below surface cultural resources.

Stipulation IX.D states that “if consulting parties identify during the duration of the PA that a significant indirect or direct adverse effect on resources determined eligible for the National Register as part of the Section 106 process for this project that was not evaluated in this PA, the consulting party shall follow procedures identified in Stipulation I.H.10. Upon such notification, FTA will call a meeting of the consulting parties to discuss what next steps would be appropriate under the circumstances to mitigate the effects on such resources.”

### Conclusions

Throughout the Section 106 consultation process that led to the development of the Programmatic Agreement, consulting parties have raised the issue and concern that the urban development enabled by the project would lead to adverse effects and irreparable harm to historic and cultural resources. FTA and the City addressed the issue by including stipulations that provided a “wait and see” approach, with the

hope and expectation that existing planning, permitting and development agencies would follow through on their preservation responsibilities.

Unfortunately we have seen that approach has failed to protect important Honouliuli traditional cultural ahupua'a properties and cultural resources. In the absence of meaningful measures from the State agencies to protect these important historic and cultural properties and resources under the Hawaii State Constitution, it is necessary to revisit the Programmatic Agreement for measures to avoid, minimize and mitigate cumulative direct and indirect effects that are being caused by the Project, and especially the Transit Oriented Developments (TOD.)

We look forward to your timely response and prompt attention to this matter.

Aloha,

A handwritten signature in black ink that reads "John M. Bond". The signature is fluid and cursive, with the first name "John" being the most prominent.

John Bond, President  
Kanehili Cultural Hui  
P.O. Box 75578  
Kapolei, Hi. 96707  
Honouliuli, Moku of Ewa  
Ewabond@gmail.com

Copies via email:

FTA: Leslie Rogers, Ted Matley  
HART: Dan Grabauskas, Brennon Morioka, John Nouchi, Kawika Farm  
ACHP: Reid Nelson, Charlene Vaughn, Blythe Semmer  
SHPD: Alan Downer, Jessica Puff, Susan Lebo  
NAVY: John Lohr, Jeff Dodge, Charlene Oka-Wong  
NTHP: Betsy Merritt, Brian Turner  
NPS: Elaine Jackson-Retondo, Paul DePrey, Melia Lane-Kamahele  
OIBC: Hinaleimoana Wong-Kalu  
AHCC: Mahealani Cypher  
OHA: Jerry Norris, Kai Markell



**HISTORIC PRESERVATION DIVISION  
DEPARTMENT OF LAND AND NATURAL RESOURCES**

601 Kamokila Boulevard, Suite 555  
Kapolei, HI 96806

January 13, 2014

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

LOG NO: 2014.00077  
DOC NO: 1401SL05  
Archaeology

Dear Mr. McDermott:

**SUBJECT: Chapter 6E-8 and National Historic Preservation Act (NHPA) Section 106 Review –  
Archaeological Data Recovery Plan for Eight Historic Properties (SIHP #s 50-80-14-2918,  
-2963, 5820, -5966, -7190, -7427, -7428, and -7429) in the City Center (Section 4) of the  
Honolulu High-Capacity Transit Corridor Project  
Honolulu Ahupua'a, Honolulu (Kona) District, Island of O'ahu  
TMKs: (1) 1-5, 2-1, and 2-3 (various)**

Thank you for the opportunity to review this revised draft report titled *Archaeological Data Recovery Plan for Eight Historic Properties (SIHP #s 50-80-14-2918, -2963, 5820, -5966, -7190, -7427, -7428, and -7429) in the City Center (Section 4) of the Honolulu High-Capacity Transit Corridor Project, Honolulu Ahupua'a, Honolulu (Kona) District, Island of O'ahu TMKs:[1] Sections: 1-5, 2-1, and 2-3 (Various Plats and Parcels)* (Yucha et al., January 2014). We received this submittal on January 7, 2014. The archaeological inventory survey (AIS) report for City Center (Section 4) was reviewed and accepted by SHPD on August 26, 2013 (Log No. 2013.2564, 2013.4338; Doc. No. 1308SL21).

The data recovery plan addresses eight historic properties in the eastern-most 4.3 miles (6.9 km) of the Honolulu High-Capacity Transit Corridor. The project area and Area of Potential Effect (APE) acreages covered by the data recovery plan correlate with the project's direct ground disturbance which consists of about 604,289 square feet or 13.87 acres.

The data recovery plan addresses the eight historic properties summarized in Table 1. The plan provides an adequate discussion of the regulatory context; the eight historic properties; the data recovery research questions, data requirements, and sampling strategies; and the general field and laboratory methods and analyses. The AIS overview sections describing the project background, environmental setting, cultural and historical background, and previous investigations, and detailed historic property descriptions are included as appendices.

Table 1. Eight Historic Properties Selected for Data Recovery

SIHP	Description	Significance (HR/NR)
50-80-14-2918	Cultural deposit, human burials	d, e / D
50-80-14-2963	Cultural deposit, pond sediments, human burials, animal burials	d, e / D
50-80-14-5820	Cultural deposit, human burials	d, e / D
50-80-14-5966	Kawa Fishpond	d / D
50-80-14-7190	Salt pan remnants	d / D
50-80-14-7427	Infrastructure remnants, cultural deposits, human skeletal element	d, e / D
50-80-14-7428	Cultural deposit, infrastructure remnant	d / D
50-80-14-7429	Cultural deposit, human skeletal element	d, e / D

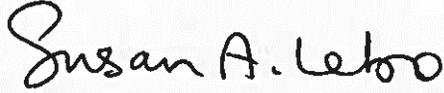
The revisions adequately address the concerns and issues raised in our earlier correspondence (January 2, 2014; Log No. 2013.6108, Doc. No. 1401SL01). We believe that this report meets the requirements of Hawaii Administrative Rule (HAR) §13-278-3 and the *Secretary of the Interior's Guidelines for Archaeology and Historic Preservation*.

Mr. McDermott  
January 13, 2014  
Page 2

The data recovery plan 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 me at (808) 692-8019 or at [Susan.A.Lebo@hawaii.gov](mailto:Susan.A.Lebo@hawaii.gov) if you have any questions or concerns regarding this letter.

Aloha,

A handwritten signature in black ink that reads "Susan A. Lebo". The signature is written in a cursive, flowing style. The background of the signature area is a light gray, textured rectangular box.

Susan A. Lebo, PhD  
Oahu Lead Archaeologist

## Silva, Josh/HNL

---

**From:** Nouchi, Jon <jnouchi@honolulu.gov>  
**Sent:** Monday, July 28, 2014 4:24 PM  
**Subject:** Links to download Makalapa NRHP Nominations

Aloha Programmatic Agreement Signatories and Consulting Parties,

As discussed in our last Kāko’o meeting on Thursday, July 24, below are two links to download the the Makalapa National Register of Historic Places Nomination forms.

[https://www.dropbox.com/s/hfflej20ystncof/HI\\_Honolulu\\_MakalapaNavyHousingDistrict\\_NRHP%20Nomination%20Form.pdf?n=163501154](https://www.dropbox.com/s/hfflej20ystncof/HI_Honolulu_MakalapaNavyHousingDistrict_NRHP%20Nomination%20Form.pdf?n=163501154)

[https://www.dropbox.com/s/9hh7f58wzfv7dl/HI\\_Honolulu\\_LittleMakalapaNavyHousingDistrict\\_NRHP%20Nomination%20Form.pdf?n=163501154](https://www.dropbox.com/s/9hh7f58wzfv7dl/HI_Honolulu_LittleMakalapaNavyHousingDistrict_NRHP%20Nomination%20Form.pdf?n=163501154)

These documents are being offered for download via Dropbox due to their large size (>272 MB total). If you require a hard copy, please let me know; we can make these available for pickup at the HART office for you.

Aloha nō,

**Jon Y. Nouchi | Deputy Director, Planning and Environmental | Honolulu Authority for Rapid Transportation (HART)**

**address** 1099 Alakea Street, Suite 1700 | **city** Honolulu | **state** Hawaii | **zip** 96813

**phone** 808.768.6275 | **mobile** 808.479.4467 | **email** [jnouchi@honolulu.gov](mailto:jnouchi@honolulu.gov)

**NOTICE:** This communication and any attachments (“this message”) may contain confidential information for the sole use of the intended recipient(s). Any unauthorized use, disclosure, viewing, copying, alteration, dissemination, or distribution of, or reliance on this message is strictly prohibited. If you have received this message in error or you are not an authorized recipient, please notify the sender immediately by replying to this message, delete this message and all copies from your e-mail system, and destroy any printed copies.

**Nouchi, Jon**

---

**From:** Kako'o [kakoo@pacificlegacy.com]  
**Sent:** Tuesday, September 02, 2014 3:08 PM  
**To:** Scanlon, Elizabeth; Nouchi, Jon  
**Cc:** josh.silva@ch2m.com; Elizabeth Kahahane  
**Subject:** The Role of the Kāko`o  
**Attachments:** Evaluating the Role of the Kako`o (082814).docx

Aloha Kākou,

Based on issues brought up during the July meeting on the role of the Kāko`o and the purpose of the monthly Kāko`o meetings, I put my thoughts together for a brief presentation at the recent August monthly meeting. I felt that the information presented at that meeting should be shared to the consulting parties that were not present. The outline of the presentation is attached. I hope that you find it useful.

One of the aspects of the Kāko`o that came up in the August meeting is that the Kāko`o will take on the responsibility of ensuring that information developed by HART and their consultants be transmitted to all the consulting parties. Following up on this Jon Nouchi of HART has provided me with several items to be transmitted, these will follow in a separate email.

If you have any questions, concerns, or comments, please contact me either by telephone or email and we can discuss your issues. Also, I am available to meet with any of you individually or as a small group if your desire. I would like to emphasize one of my concluding points from my August presentation - the Kāko`o is what you want it to be. I am here to support your consulting efforts.

Paul

**Paul L. Cleghorn, Ph.D.**  
**Kāko`o -- Honolulu Rail Transit Project**  
**Principal and Senior Archaeologist**

**Pacific Legacy, Inc.**  
**30 Aulike Street, Suite 301**  
**Kailua, HI 96734**  
**(o) 808-263-4800; (f) 808-263-4300**

**EVALUATING THE ROLE OF THE KAKO‘O**  
**28 August 2014**

- I. I understand (Umi) that some dissatisfaction with the Kāko`o Meetings was voiced at the July meeting
- II. These monthly Kāko‘o meetings were not specified in the PA, but were proposed by me as a means of sharing information with the CPs.
  - A. For the first 6 month or so these meetings were held without an agenda with the aim of allowing CPs to voice their concerns. The meetings devolved into grousing sessions and were not overly productive.
  - B. For the next 8 or so months we had more organized meetings that followed selected topics suggested by the attending CPs. After awhile, dissatisfaction arose with the Kāko‘o’s inability to obtain timely responses to concerns raised.
- III. At the annual PA meeting in December 2013, it was decided to re-orient the Kāko‘o Meetings to include HART personnel, so that CPs could direct specific questions to the people that could directly answer the questions.
  - A. This new format has worked well until recently.
- IV. My understanding is that the current concerns are:
  - A. Kāko‘o meetings have become HART meetings
  - B. Need for a 6 month schedule of Kāko‘o meetings (the fourth Thursday of every month)
  - C. The Kāko‘o needs to be present at all meeting,
  - D. Email responses regarding concerns is too slow or non-existent (this is a HART/FTA issue, not a Kāko‘o issue.
- V. The Role of the Kāko‘o
  - A. The Kāko‘o acts as an intermediary between the CPs and HART

- B. The Kāko‘o main function is to assist the CPs in obtaining information and documentation so that they can effectively consult on the project.**
- C. The Kāko‘o is to provide assistance to any of the signatories if requested. Examples are:**
  - 1. Assist in the review of AIS draft reports**
  - 2. Provide comments on HABS/HAER reports**
  - 3. Provide review comments of NRHP forms**
- D. The Kāko‘o really is whatever the CPS want to make of it. To date there have been very little requests from CPs of the Kāko‘o. If there is something that is wanted, the CPs need to voice that desire and the Kāko‘o will do all that is possible to accommodate the request.**

## **VI. Moving Forward**

- A. The Kāko‘o will be represented at all future meetings. If not by me, personally, by another member of the Kāko‘o team.**
- B. The Kāko‘o will take over the responsibility of taking notes at the monthly meetings**
- C. Finally, I reiterate that I am always available to talk or meet with any of the CPs regarding historic preservation aspects of this project.**



# CULTURAL SURVEYS HAWAII

ARCHAEOLOGICAL, CULTURAL, AND HISTORICAL DOCUMENTATION SERVICES SINCE 1982

Hallett H. Hammatt, Ph.D.  
*President*

O'ahu Office  
PO Box 1114  
Kailua, HI 96734

Ph: 808-262-9972  
Fax: 808-262-4950

Douglas Borthwick, B.A.  
William Folk, B.A.  
Matt McDermott, M.A.  
David Shideler, M.A.

Maui Office  
1860 Main Street  
Wailuku, HI 96793

Ph: 808-242-9882  
Fax: 808-244-1944

Tanya Lee-Greig, M.A.

Hawai'i Island Office  
PO Box 393  
Pāhoa, HI 96778

Ph: 808-965-6478  
Fax: 808-965-6582

Sarah Wilkinson, B.A.

Kaua'i Office  
PO Box 498  
Lāwa'i, HI 96765

Ph: 808-245-9374  
Fax: 808-245-4883

Gerald Ida, B.A.  
Missy Kamai, B.A.

Toll Free  
1-800-599-9962

Website  
[www.culturalsurveys.com](http://www.culturalsurveys.com)

Email  
[info@culturalsurveys.com](mailto:info@culturalsurveys.com)

September 15, 2014

Dr. Susan Lebo  
Mr. Hinano Rodrigues  
DLNR—State Historic Preservation Division  
Kākuhihewa Building, Suite 555  
601 Kamōkila Boulevard  
Kapolei, Hawai'i 96707  
Phone: (808) 692-8019  
Fax: (808) 692-8020

Subject: *End of Fieldwork Letter Report for Archaeological Data Recovery of Eight Historic Properties (SIHP #s 50-80-14-2918, -2963, -5820, -5966, -7190, -7427, -7428, and -7429) in the City Center (Section 4) of the Honolulu Rapid Transit Project (H RTP), Kalihi, Kapālama, Honolulu, and Waikīkī Ahupua'a, Honolulu (Kona) District, O'ahu, TMKs: [1] 1-5, 2-1, and 2-3 (Various Plats and Parcels)*

CSH Job Code: HONOLULU 44

Dear Dr. Lebo and Mr. Rodrigues:

The purpose of this letter is to provide you with an end of fieldwork report on the archaeological data recovery conducted for City Center (Section 4) of the Honolulu Rapid Transit Project (H RTP) and to request verification of completion of the detailed mitigation plan pursuant to Hawai'i Revised Statutes (HRS) §13-13-275-9(d). The comprehensive archaeological data recovery report is currently being prepared and will be submitted upon completion.

On behalf of the Honolulu Authority for Rapid Transportation (HART) of the City and County of Honolulu (City) and the Federal Transit Administration (FTA) and at the request of PB Americas, Inc. (PB), Cultural Surveys Hawai'i, Inc. (CSH) conducted an archaeological data recovery investigation for City Center (Section 4) of the H RTP, Kalihi, Kapālama, Honolulu, and Waikīkī Ahupua'a, Honolulu (Kona) District, O'ahu, TMKs: [1] 1-5, 2-1, and 2-3 (various plats and parcels). The entire proposed H RTP corridor extends approximately 20 miles (32 km) from East Kapolei in the west to Ala Moana Center in the east. The H RTP corridor is divided into four sections. From west to east these are Section 1, West-O'ahu/Farrington Highway, extending from East Kapolei to approximately Leeward Community College; Section 2, Kamehameha Highway, extending from Leeward Community College to

Aloha Stadium; Section 3, Airport, extending from Aloha Stadium to approximately the Middle Street Interchange; and Section 4, City Center, extending from Middle Street to Ala Moana Center (Figure 1). The focus of this archaeological data recovery investigation was the eastern-most 4.3 miles (6.9 km) of the overall HRTTP corridor, termed the City Center study area. The City Center study area includes all of Section 4 and, in order to provide continuity, the eastern-most portion of Section 3 (Airport). The City Center study area extends from Kalihi Stream in the west to Ala Moana Center in the east.

The purpose of the HRTTP is to provide high-capacity rapid transit in the highly congested east-west transportation corridor between Kapolei and Ala Moana Center via a fixed guideway rail transit system. The project involves the proposed construction of transit stations and ancillary support facilities, relocation of a utility corridor, installation of additional utilities, and road widening.

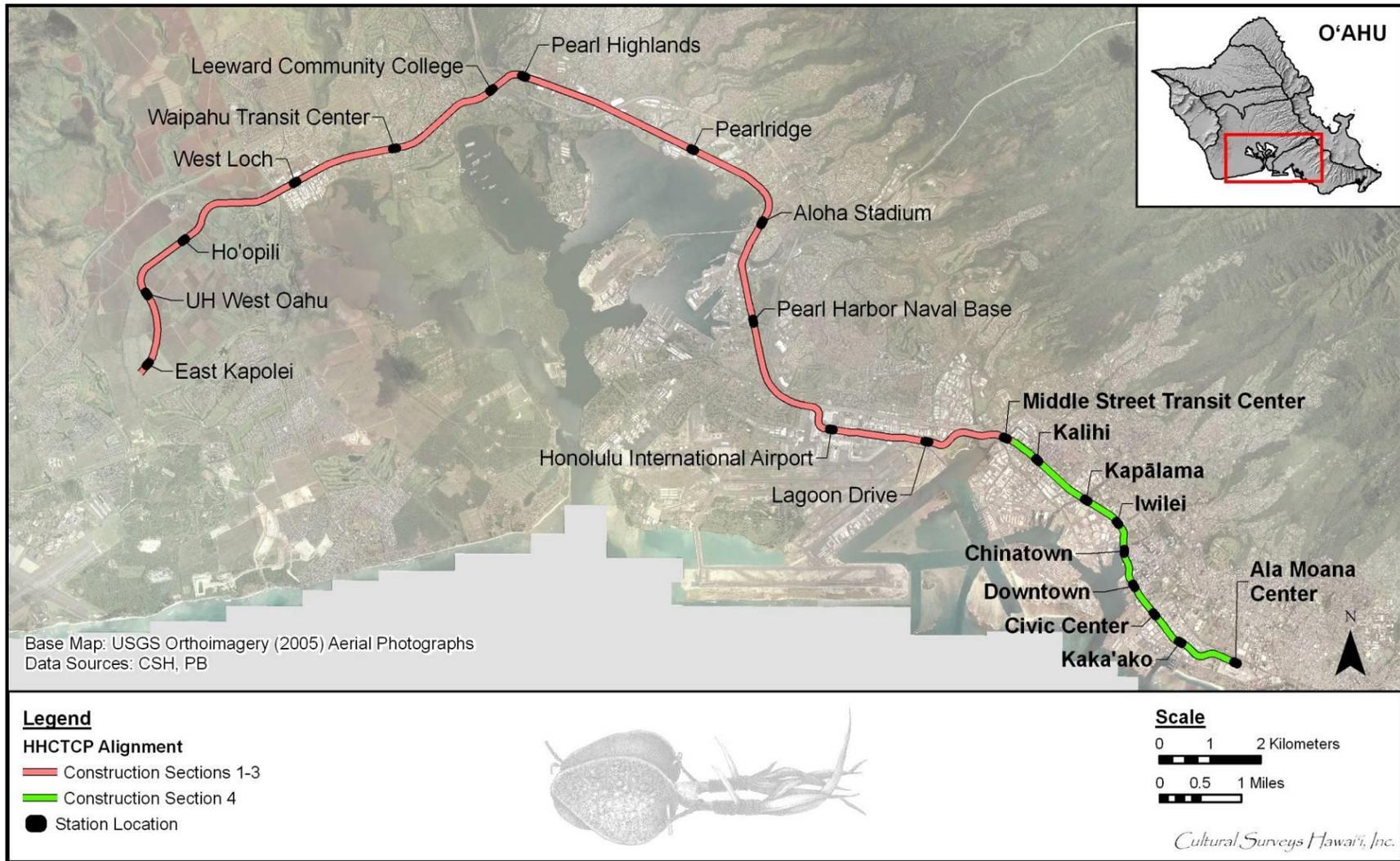
Due to federal (FTA) funding and the use of federal (U.S. Navy) lands (in Section 3), this project is a federal undertaking requiring compliance with Section 106 of the National Historic Preservation Act (NHPA), the National Environmental Policy Act (NEPA), and Section 4(f) of the Department of Transportation Act. Through the Section 106 historic preservation review process, the project's lead federal agency, FTA, 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 Hawai'i State Historic Preservation Officer (SHPO) concurred with this undertaking effect determination.

To mitigate the undertaking's potential adverse effect, a Programmatic Agreement (PA) was executed on January 18, 2011 with the FTA, the Hawai'i SHPO, the United States Navy, and the Advisory Council on Historic Preservation as signatories and the City as an invited signatory. PA Stipulation III required that an archaeological inventory survey plan (AISP) be prepared and accepted by the SHPD for each of the four HRTTP construction sections. An AISP for City Center (Hammatt et al. 2011) was prepared and was accepted in the 25 October 2011 SHPD Section 106 review letter (Log No. 2011.2379, Doc. No. 1110NN08).

Subsequently, consideration was given to an alternate site (Alternate A) for the Kaka'ako Station located approximately 50 m northeast (*mauka*) of the Kaka'ako Station location addressed in the Hammatt et al. (2011) City Center AISP. This alternate station site and associated minor changes to the immediately adjacent guideway alignment were addressed in an Addendum AISP (Hammatt et al. 2013). The Addendum AISP was accepted in the 1 March 2013 SHPD Section 106 review letter (Log No. 2013.1958, Doc. No. 1302SL28).

The City Center AIS report (Hammatt 2013) was accepted in the 26 August 2013 SHPD Section 106 review letter (Log No. 2013.2564/2013.4338, Doc. No. 1308SL21). The AIS report for all four sections of the HRTTP was accepted in the SHPD Section 106 review letter of 27 August 2013 (Log No. 2013.4987, Doc. No. 1308SL23).

Following AIS fieldwork, an Interim Protection Plan (IPP) for the HRTTP (Hammatt and Shideler 2013) was completed. The plan addressed interim protection measures for all of the cultural resources identified within the four sections of the project. The IPP was accepted in the SHPD review letter of 29 August 2013 (Log No. 2013.5066A, Doc. No. 1308PA01).



p

Figure 1. Aerial photograph (source: USGS Orthoimagery 2005) showing the entire HRTCP corridor from East Kapolei to Ala Moana Center, including station locations, with the City Center AIS study area called out in green

Re: End of Fieldwork Letter Report for ADR for the HRTCP—City Center

The City Center archaeological data recovery plan (ADRP) (Yucha et al. 2014) was prepared in consideration of Stipulation III.E.2. (describing data recovery programs) of the project's final PA (January 2011) and the *Secretary of the Interior's Guidelines for Archeology and Historic Preservation* and in accordance with HAR §13-13-278 governing standards for archaeological data recovery studies and reports. The ADRP was accepted in the 13 January 2014 SHPD Chapter 6E-8 and Section 106 review letter (Log No. 2014.00077, Doc. No. 1401SL05).

The ADRP recommended eight of the 19 archaeological cultural resources identified within, or immediately adjacent to, the City Center AIS study area for data recovery (Figure 2). The data recovery investigation will serve to mitigate the project's effect on these significant cultural resources. The eight selected cultural resources are SIHP #s 50-80-14-2918, a subsurface cultural deposit including human burials; -2963, a subsurface cultural deposit, subsurface pond sediments, human burials, and animal burials; -5820, a subsurface cultural deposit including human burials; -5966, subsurface remnants of Kawa Fishpond; -7190, subsurface salt pan remnants; -7427, subsurface historic infrastructure remnants, subsurface cultural deposits, and a human skeletal element; -7428, a subsurface cultural deposit and subsurface infrastructure remnants; and -7429, a subsurface cultural deposit and a human skeletal element (Table 1). Table 1 includes significance assessments as well as additional mitigation recommendations for each cultural resource that will be addressed in separate documents.

The data recovery investigation began on 7 February 2014 and was completed on 17 May 2014. Archaeological data recovery fieldwork was performed under the supervision of Matt McDermott, M.A., and Hallett H. Hammatt, Ph.D. (Principal Investigators). Field staff included 26 CSH archaeologists: Scott Belluomini, Douglas Borthwick, Kelly Burke, Lauren Compton, Amanda Eggers, Brittany Enanoria, Nathaniel Garcia, Megan Hawkins, Nigel Kingsbury, Frederick LaChance, Kimi Matsushima, Leandra Medina, Laura Ortiz, Malina Reveal, Andrew Soltz, Ena Sroat, Tyler Turran, Laura Vollert, Tim Zapor, Tara del Fierro, David Doig, Nifae Hunkin, Douglas Inglis, Robin Keli'i, Veronica Morriss, and Michael Rivera. The fieldwork required 2,309.5 person-hours or approximately 289 person days to complete.

Cultural monitoring for this project was performed by 'Ōiwi Cultural Resources. Cultural monitors included 16 individuals: Paulette Ka'anohi Kaleikini, Guyson Amina, Norman Caceres, Tawnya Domingo, Kealii Gilman, Kala Kaleikini, Tuahine Kaleikini, Euelray Kaleihau Kamauu, Olana Kamohalii, Kimball Kaopio, Kala Keliinoi, George McIntosh, Lanaytte Paia, Justin Pratt, Moani Soares, and JR Williams. This work entailed 1124.5 person-hours or approximately 141 person days.

During the current data recovery investigation, one or more locations within each of the eight cultural resources were chosen for controlled excavation (Figure 3 through Figure 10). Data recovery of SIHP # -2918 involved the excavation of three trenches: T-226E, T-226F, and T-227C. The data recovery of SIHP # -2963 involved the excavation of two trenches: T-122B and T-123A. The data recovery of SIHP # -5820 involved the excavation of three trenches: T-150A, T-150B, and T-150C. The data recovery of SIHP # -5966 involved the excavation of four trenches: T-95A, T-95A extension, T-95B, and T-95C. The data recovery of SIHP # -7190 involved the excavation of one trench: T-229A. The data recovery of SIHP # -7427 involved the excavation of five trenches: T-99A, T-100A, T-100B, T-101A, and T-101B. The data recovery of SIHP # -7428 involved the excavation of three trenches: T-120C, T-120D, and T-120E. The data recovery of SIHP # -7429 involved the excavation of two trenches: T-168C and T-168D.

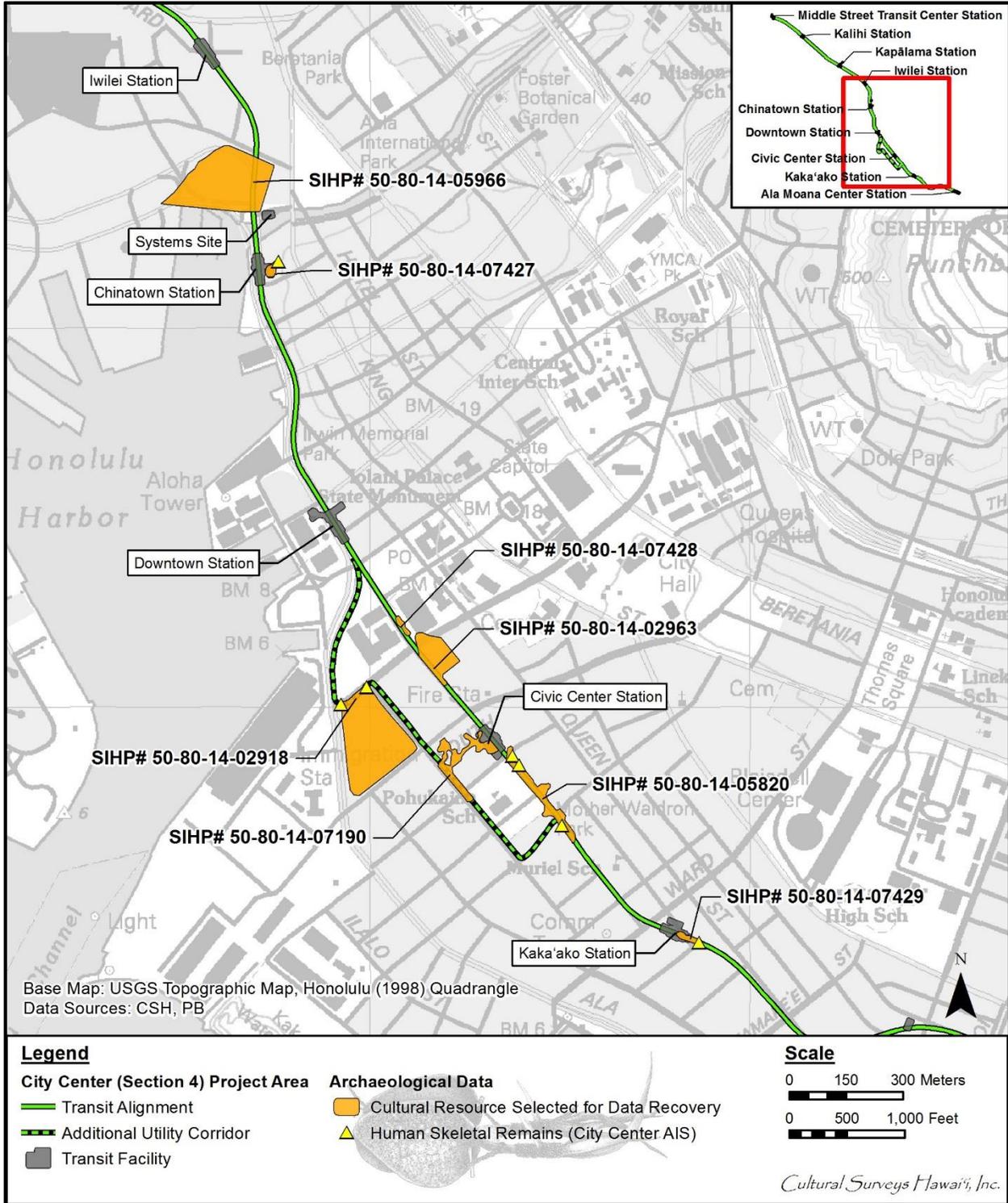


Figure 2. Cultural resources selected for data recovery within the City Center study area

Table 1. Archaeological Cultural Resources Selected for Data Recovery

SIHP # 50-80-14-	Description/Formal Type	Tax Map Keys	Land Jurisdiction	Significance		Additional Mitigation Recommendations
				Hawai‘i	National	
2918	Subsurface cultural deposit, human burials	[1] 2-1-027 (Punchbowl St. ROW por.) and [1] 2-1-029:001	City and County of Honolulu	d and e	D	Monitoring and burial treatment
2963	Subsurface cultural deposit, subsurface pond sediments, human burials, animal burials	[1] 2-1-030 (Halekauwila St. ROW por.), [1] 2-1-026:001, and [1] 2-1-031:010	City and County of Honolulu	d and e	D	Monitoring
5820	Subsurface cultural deposit, human burials	[1] 2-1-050:067, [1] 2-1-050 (Halekauwila St. ROW por.), [1] 2-1-051 (Halekauwila St. ROW por.), [1] 2-1-031 (Keawe Street ROW por.), and [1] 2-1-051:003 and :038	Hawai‘i Community Development Authority and the City and County of Honolulu	d and e	D	Monitoring and burial treatment
5966	Subsurface remnants of Kawa Fishpond	[1] 1-5-008:001, :004, :005, :014, :015, :018, :020; [1] 1-5-039; [1] 1-5-039:001, :007, :010; [1] 1-5-040:002, :004; and [1] 2-1-001	Jiriochi Otani Family, Ltd. and the State of Hawai‘i	d	D	Monitoring
7190	Subsurface salt pan remnants	[1] 2-1-030 (Pohukaina St. ROW por.), [1] 2-1-051 (Pohukaina St. ROW por.), and [1] 2-1-030:001 and :043	Kamehameha Schools; City and County of Honolulu	d	D	Monitoring

SIHP # 50-80-14-	Description/Formal Type	Tax Map Keys	Land Jurisdiction	Significance		Additional Mitigation Recommendations
				Hawai'i	National	
7427	Subsurface infrastructure remnants, subsurface cultural deposits/human skeletal element	[1] 1-5-002:026 and [1] 1-5-002 (Nimitz Hwy. ROW por.)	City and County of Honolulu	d and e	D	Monitoring and burial treatment
7428	Subsurface cultural deposit, subsurface infrastructure remnant	[1] 2-1-026:001 and :022 and [1] 2-1-026 (Halekauwila St. ROW por.)	State of Hawai'i and the City and County of Honolulu	d	D	Monitoring
7429	Subsurface cultural deposit, human skeletal element	[1] 2-3-002:001 and :059	Victoria Ward, Ltd.	d and e	D	Monitoring and burial treatment

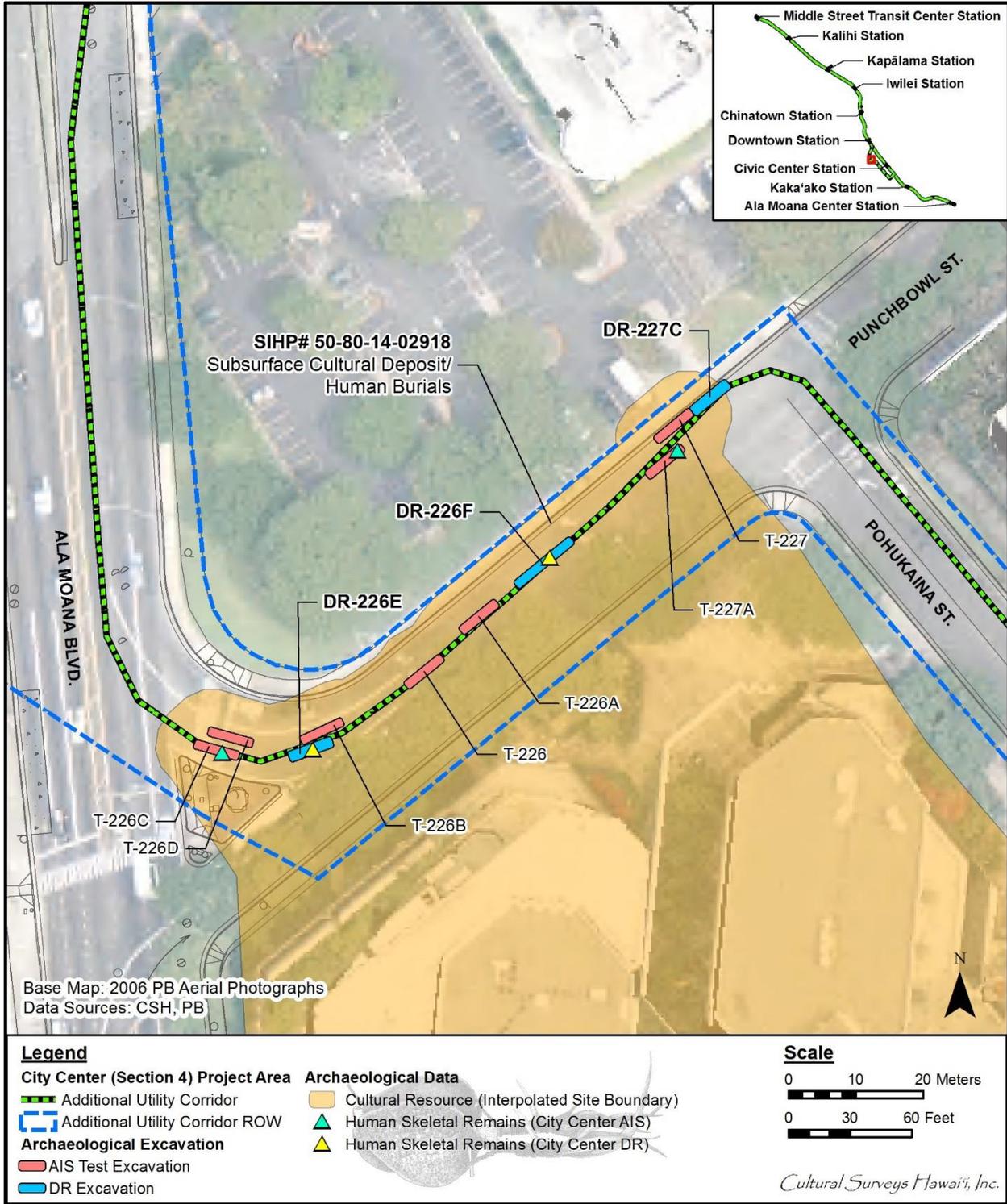


Figure 3. Data recovery test excavation locations within SIHP # -2918

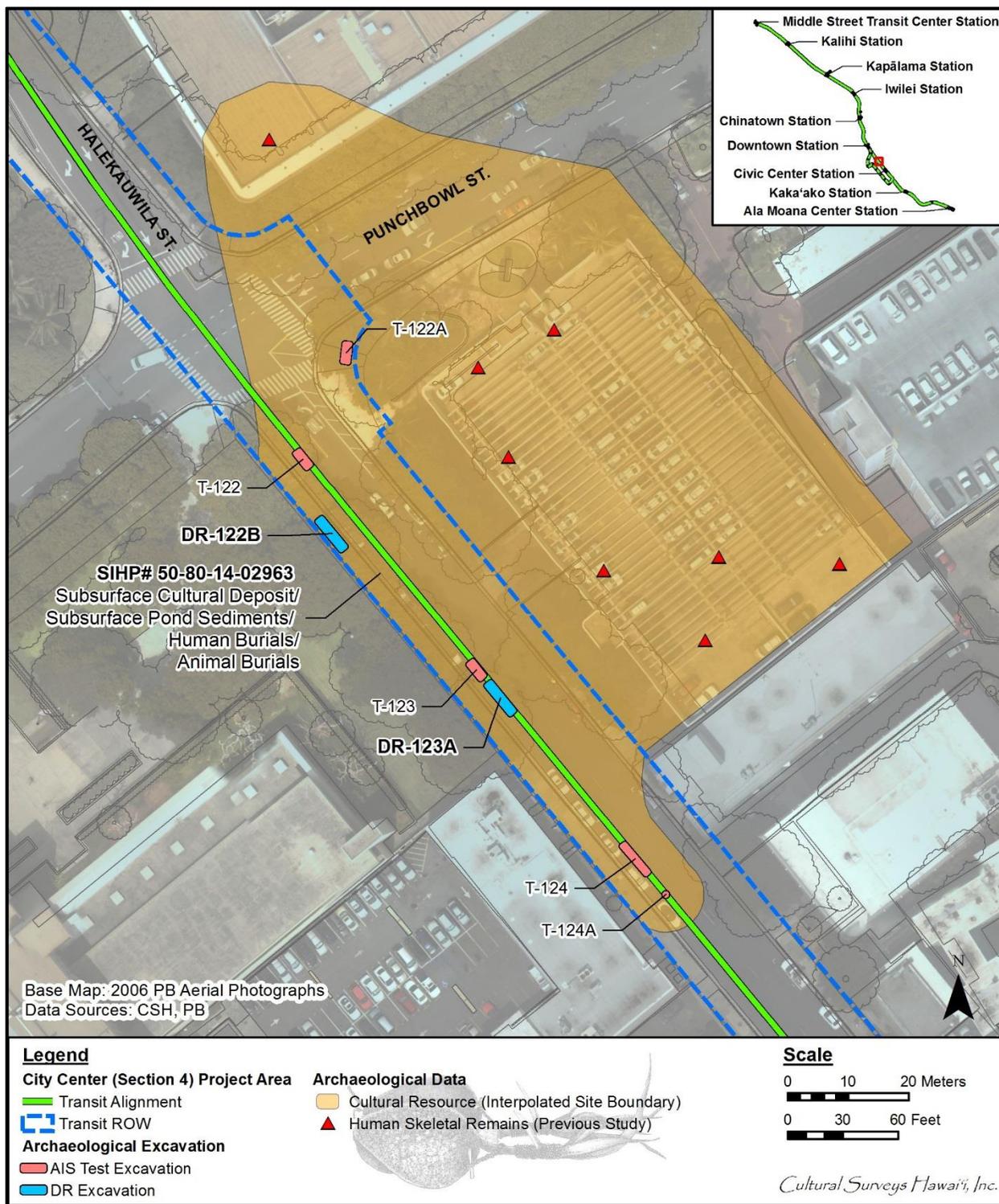


Figure 4. Data recovery test excavation locations within SIHP # -2963

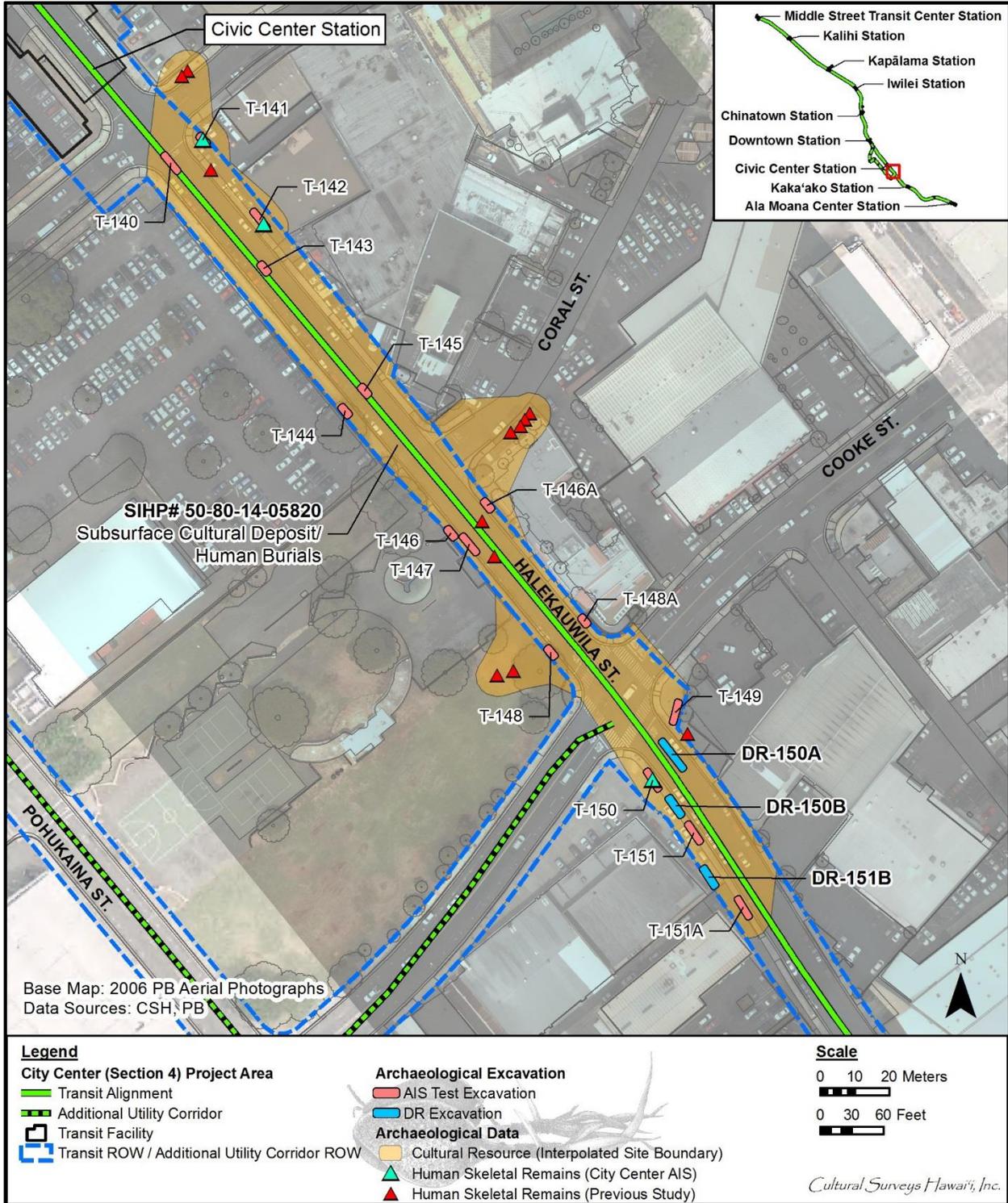


Figure 5. Data recovery test excavation locations within SIHP # -5820

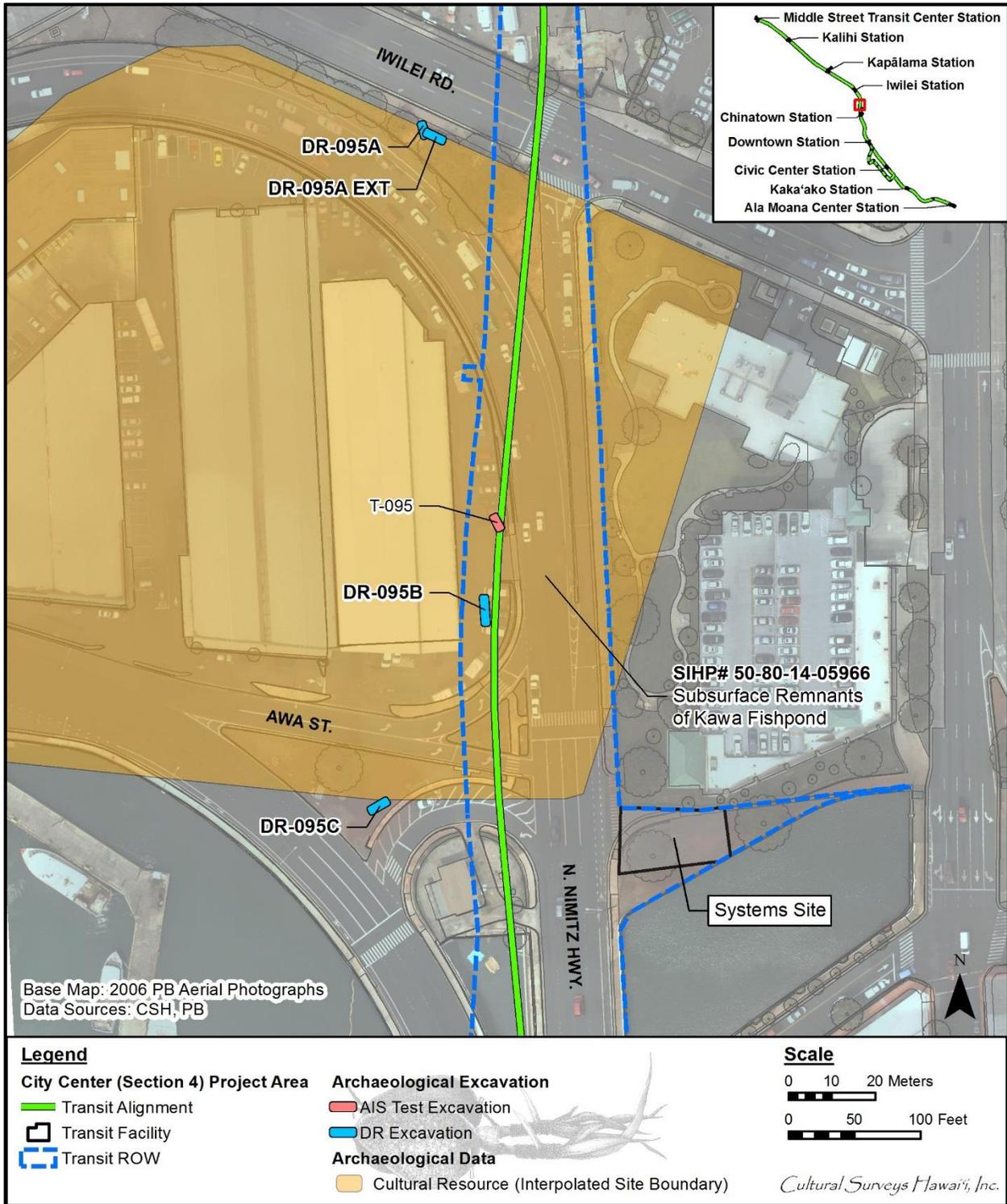


Figure 6. Data recovery test excavation locations within SIHP # -5966

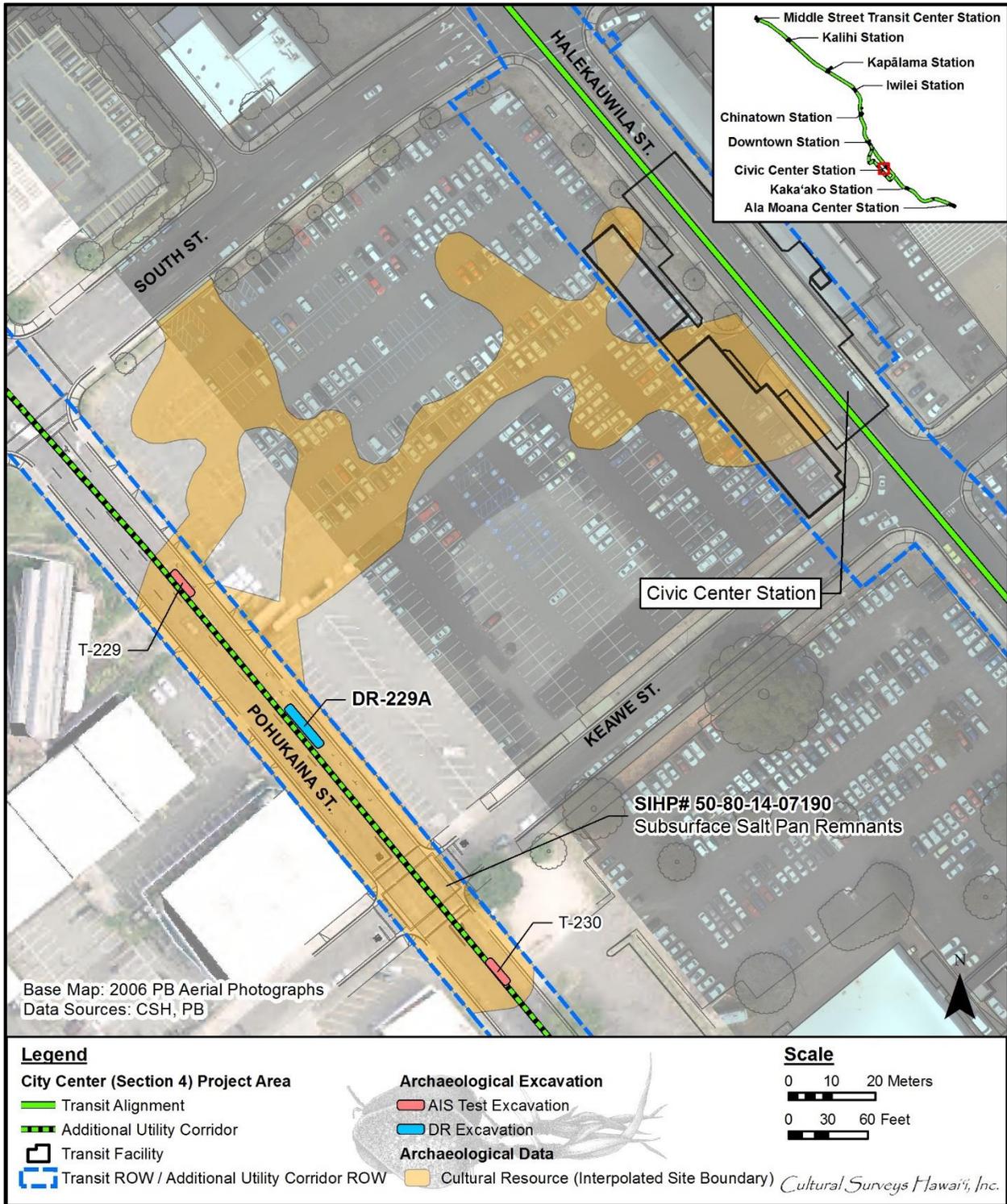


Figure 7. Data recovery test excavation locations within SIHP # -7190

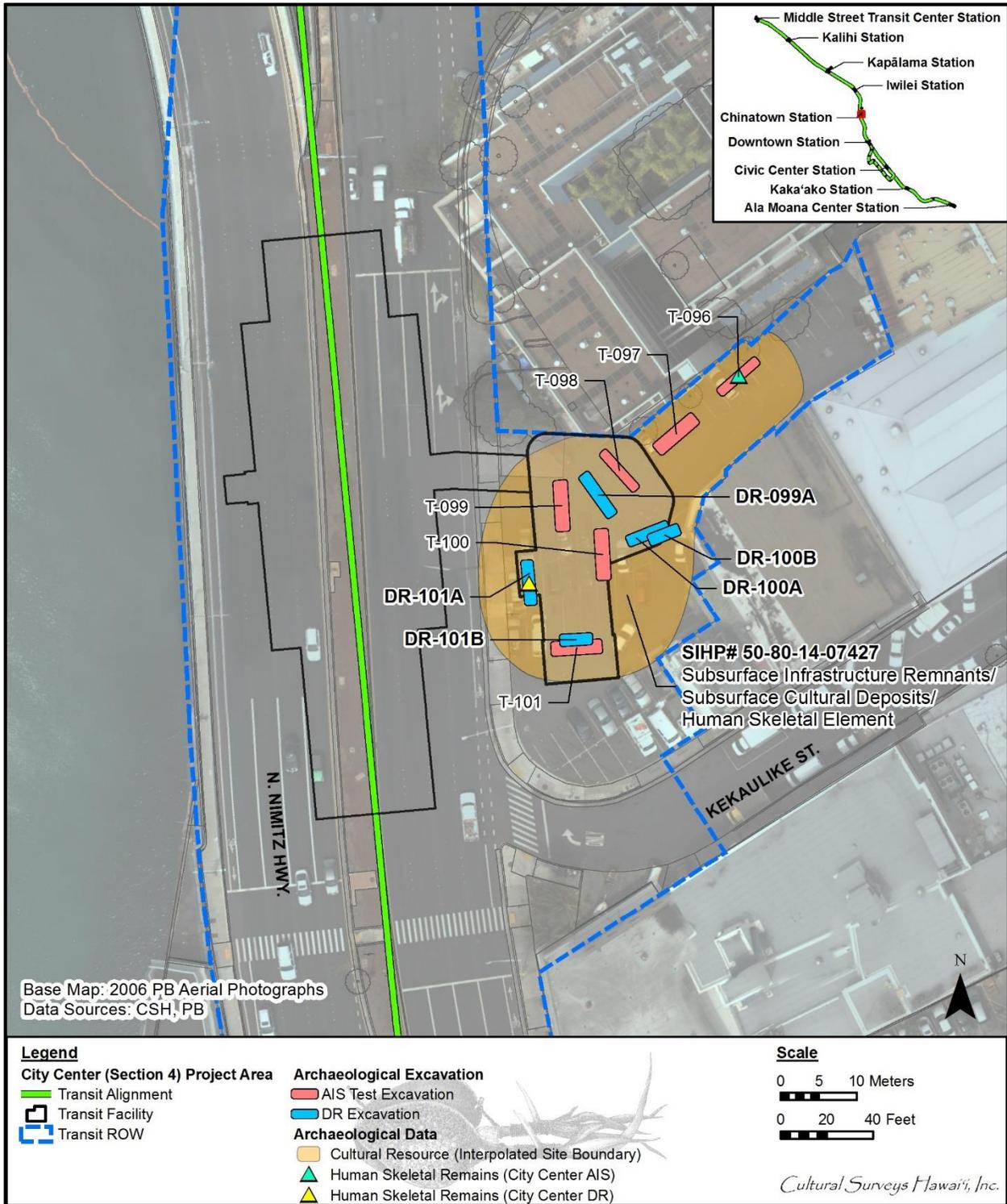


Figure 8. Data recovery test excavation locations within SIHP # -7427

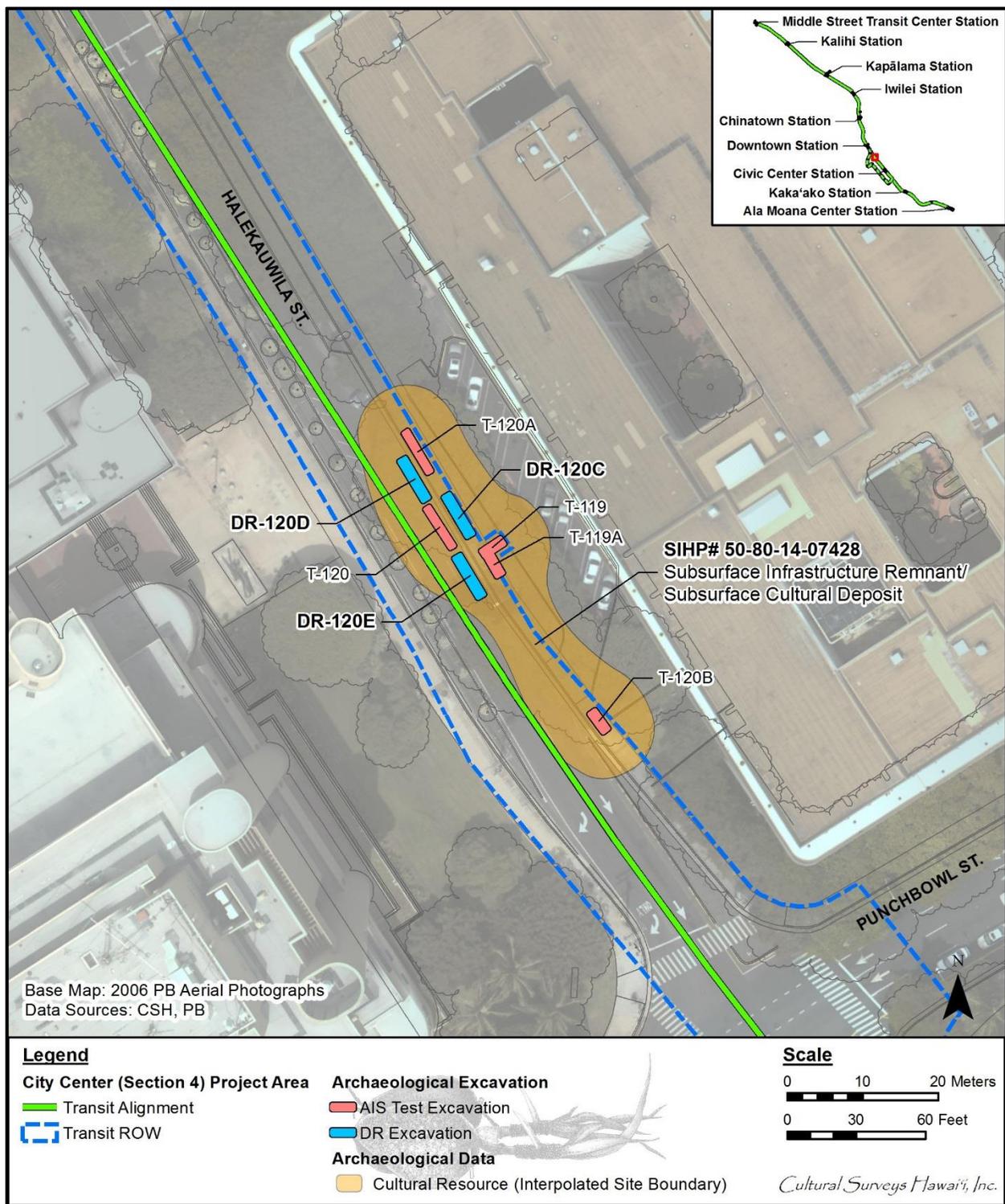


Figure 9. Data recovery test excavation locations within SIHP # -7428

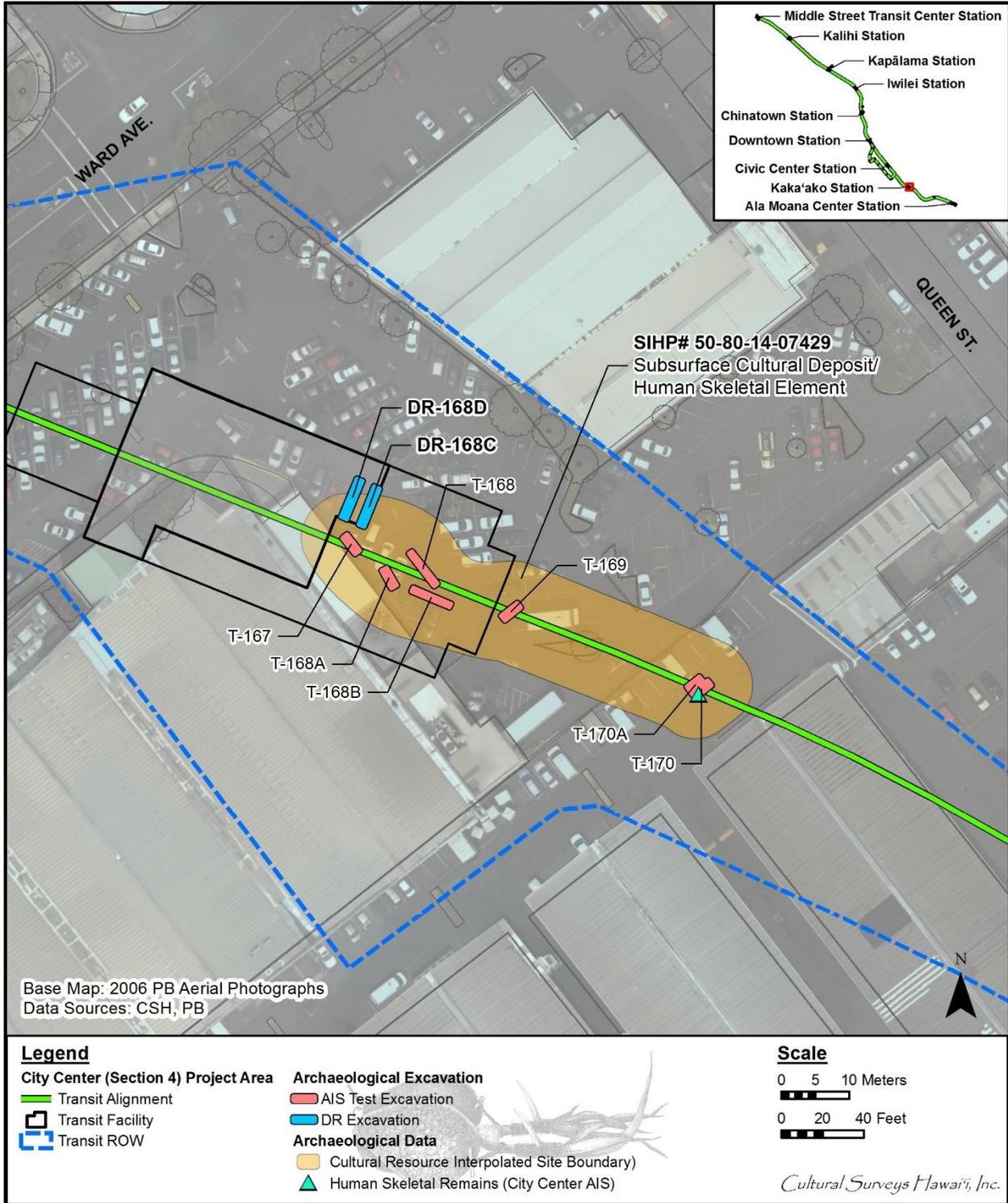


Figure 10. Data recovery test excavation locations within SIHP # -7429

**SIHP # -2918**

The planned data recovery of SIHP # -2918 (a subsurface cultural deposit including human burials) involved the excavation of three 6-m long by 1-m wide test excavations. Test excavation locations were based on the locations of anticipated project ground disturbance and avoidance of subsurface utilities.

T-226E was located in Punchbowl Street near the Ala Moana intersection. It was oriented 60/240° True North (TN). The test excavation ended up being 6.8 m long by 0.9 m wide, and it reached a maximum depth of 1.5 mbs. Heavy oil contamination was observed at the water table around 1.46 mbs. Three culturally-enriched A-horizons were documented within T-226E. The uppermost cultural layer may be redeposited as it truncated the upper portion of the cultural layer directly beneath it. The lowest cultural layer was separated from the cultural layers above it by a layer of Jaucas sand. The cultural layers contained scattered charcoal, fire-affected rock (FAR), shell, faunal remains, and Traditional Hawaiian and historic artifacts. There were 43 pit features associated with the upper two cultural layers. No features were associated with the lowest cultural layer. Most of the pit features are of indeterminate function and contained cultural material such as charcoal, FAR, shell, faunal bone, sea urchin remains, coral, glass, metal, basalt cobbles, and possible Traditional Hawaiian artifacts. One of the features was a dog burial.

A human rib fragment was identified from within a utility trench that bisected the test excavation. A human cranial fragment was also identified from the backdirt pile, but its exact provenience is unknown other than it appears to have come from the same depth as the rib fragment.

T-226F was located along Punchbowl Street between Ala Moana and Pohukaina Street. It was oriented 53/233° TN. The test excavation ended up being 9.81 m long by 1.05 m wide, and it reached a maximum depth of 1.55 mbs. Two culturally-enriched A horizons with 24 associated features were documented within T-226F. The upper cultural layer appears to be an imported fill layer that was utilized as a historic land surface. It was directly overlying the lower cultural layer, and it had one associated feature. The lower cultural layer lay atop natural Jaucas sand and had 23 associated features. The features were mostly pits of indeterminate function, but there were possible midden pits, a historic trash pit, a possible fire pit, and a possible post mold. The features contained cultural material such as charcoal, faunal bone, shell, sea urchin, coral, FAR, basalt cobbles, wood, Traditional Hawaiian and historic artifacts, and isolated human skeletal remains (a cranial fragment from one feature).

T-227C was located in Punchbowl Street at the Pohukaina Street intersection. It was oriented 40/220° TN. The test excavation ended up being 6.85 m long by 1 m wide, and it reached a maximum depth of 1.33 mbs. Two culturally-enriched A horizons with 22 associated features were documented within T-227C. The cultural layers contained faunal bone and Traditional Hawaiian and historic artifacts. The features contained cultural materials such as shell, faunal bone, charcoal, FAR, coral and basalt cobbles, and Traditional Hawaiian and historic artifacts. Most of the features were indeterminate pits, but one was an arrangement of stacked coral and basalt cobbles capped with a waterworn basalt manuport.

All three data recovery test excavations identified multiple cultural layers and associated features designated as part of SIHP # -2918. An additional 89 associated pit features were documented. Isolated human skeletal remains were identified in two of the test excavations.

**SIHP # -2963**

The planned data recovery of SIHP # -2963 (a subsurface cultural deposit, subsurface pond sediments, human burials, and animal burials) involved the excavation of two 6-m long by 1-m wide test excavations. Test excavation locations were based on the locations of anticipated project ground disturbance, avoidance of subsurface utilities, and the GIS-referenced locations of the interface of pond sediments and A horizon/sand deposits.

T-122B was located in the *makai* sidewalk of Halekauwila Street between Punchbowl and South Streets. It was oriented 130/310° TN. The test excavation ended up being 6.74 m long by 0.94 m wide, and it reached a maximum depth of 1.83 mbs. The test excavation contained a layer of loamy clay material that is interpreted as having been a berm associated with a pond that was formerly in the area. The pond is labeled “Auwaiolimu; Crown Land” on the 1881 Brown map of Honolulu (Figure 11). A layer of coarse-grained sandy clay beneath the berm appears to be pond sediment. Faunal material was observed within the berm material. No features were observed in this test excavation.

T-123A was located in Halekauwila Street between Punchbowl and South Streets. It was oriented 136/316° TN. The test excavation ended up being 6.7 m long by 0.9 m wide, and it reached a maximum depth of 1.9 mbs. One naturally-deposited layer, sandy loam pond sediment, was documented within the test excavation. This layer contained an appreciable amount of brackish snails. Cultural material from the layer included a glass bottle, a painted (blaze orange) wood fragment, and a coconut husk. No features were observed in this test excavation.

Both data recovery test excavations yielded subsurface pond sediments (associated with the “Auwaiolimu; Crown Land” pond) designated as SIHP # -2963.

**SIHP # -5820**

The planned data recovery of SIHP # -5820 (a subsurface cultural deposit including human burials) involved the excavation of three 6-m long by 1-m wide test excavations. Test excavation locations were based on the location of anticipated project ground disturbance and avoidance of subsurface utilities.

T-150A was located at the corner of Halekauwila and Cooke Streets. It was oriented 142/322° TN. The test excavation ended up being 9.8 m long by 0.63 m wide, and it reached a maximum depth of 1.55 m. The *‘ewa* and Diamond Head halves of the test excavation differed considerably. The *‘ewa* half of the test excavation contained an in situ historic cultural layer with one associated feature. The *‘ewa* cultural layer contained FAR, shell, faunal bone, and historic artifacts. The single feature was a post mold, and it contained a post remnant, FAR, shell, and faunal bone. The Diamond Head half of the test excavation contained two likely redeposited cultural layers above pond sediment. The pond sediment contained organic material (e.g., leaves, roots), shell, faunal bone, and historic artifacts. The Diamond Head cultural layers contained charcoal, FAR, shell, water-rounded cobbles, faunal bone, and historic artifacts. No human remains or burials were identified within this test excavation.

T-150B was located at the corner of Halekauwila and Cooke Streets. It was oriented 136/316° TN. The test excavation ended up being 6.7 m long by 1.5 m wide, and it reached a maximum depth of 1.77 mbs. Two components of a cultural layer were documented within this test excavation. The upper cultural layer component appeared to be locally procured and redeposited

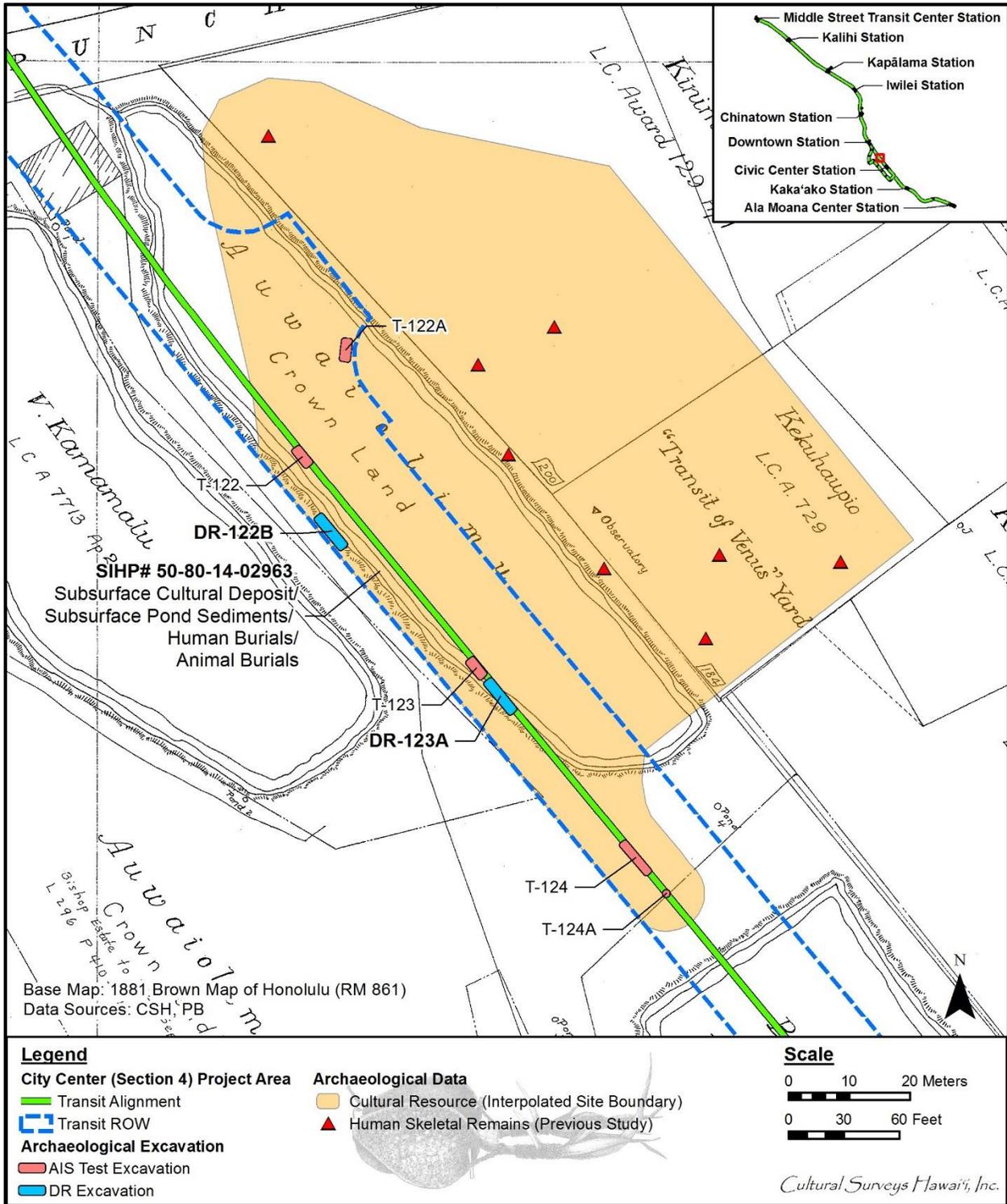


Figure 11. 1881 Brown map of Honolulu depicting T-122B on the edge of a pond labeled “Auwaiolimu; Crown Land”

cultural layer material that was utilized as a historic land surface. This layer truncated the lower cultural layer component. Cultural material contained within these layers included historic artifacts (such as bricks, nails, and ceramic and glass fragments) FAR, shell, and faunal bone. A total of 21 features were associated with these cultural layers. The features contained cultural materials such as charcoal, FAR, shell, asphalt chunks, and historic artifacts. The features were mostly pits of indeterminate function, but there were two post molds and one possible fire pit. No human remains or burials were identified within this test excavation.

T-150C was located at the corner of Halekauwila and Cooke Streets. It was oriented 132/312° TN. The test excavation ended up being 6.7 m long by 0.96 m wide, and it reached a maximum depth of 1.63 mbs. Two cultural layers were documented within this test excavation. The upper cultural layer appears to be redeposited cultural layer material that was utilized in historic times. It was heavily compacted. It is unclear at this time whether the lower cultural layer was also redeposited or if it was in situ. Laboratory analyses may help resolve this. Cultural material contained within these layers included charcoal, faunal bone, shell, and historic artifacts. Nine features were found associated with the upper cultural layer and one feature was found associated with the lower cultural layer. The features were mostly pits of indeterminate function, but there was a pig burial, a post mold, and a charcoal concentration. The ten features contained cultural materials such as charcoal, slag, and faunal bone. No human remains or burials were identified within this test excavation.

All three data recovery test excavations identified multiple cultural layers designated as part of SIHP # -5820. Oftentimes, the cultural layers appeared to be redeposited and historically utilized. An additional 32 associated pit features were documented.

### **SIHP # -5966**

The planned data recovery of SIHP # -5966 (subsurface remnants of Kawa Fishpond) involved the excavation of three 6-m long by 1-m wide test excavations within the former footprint of Kawa Fishpond (Figure 12). In actuality, four data recovery test excavations were completed. Test excavation locations were based on the location of anticipated project ground disturbance, avoidance of subsurface utilities, and general distribution coverage, encompassing both the central and perimeter portions of Kawa Fishpond.

T-95A was located at the corner of Iwilei Road and North Nimitz Highway. It was oriented 162/342° TN. The test excavation ended up being 3.3 m long by 1 m wide, and it reached a maximum depth of 2.07 mbd. This test excavation documented three layers of silty clay that are believed to be associated with Kawa Fishpond and earlier lagoonal sediment. The uppermost silty clay layer is believed to be associated with Kawa Fishpond, while the middle layer may represent either an early period of the pond's use or may predate the pond. The lowest layer represents lagoonal sediment that predates the pond. The middle silty clay layer contained two *kukui* nut shell fragments and a ceramic sherd. The lagoonal sediment contained coral pieces. No features were observed in this test excavation.

An extension of T-95A was excavated off of the southeast edge of T-95A in order to compensate for the shortened length of T-95A. The extension was oriented 110/290° TN. The test excavation ended up being 4.3 m long by 1 m wide, and it reached a maximum depth of 1.85 mbd. This test excavation documented four layers of silty clay and silty sandy clay. The uppermost three layers appear to be related to Kawa Fishpond, while the lowest layer appears to be earlier lagoonal sediment. A volcanic glass flake was recovered from the upper Kawa Fishpond layer. The middle

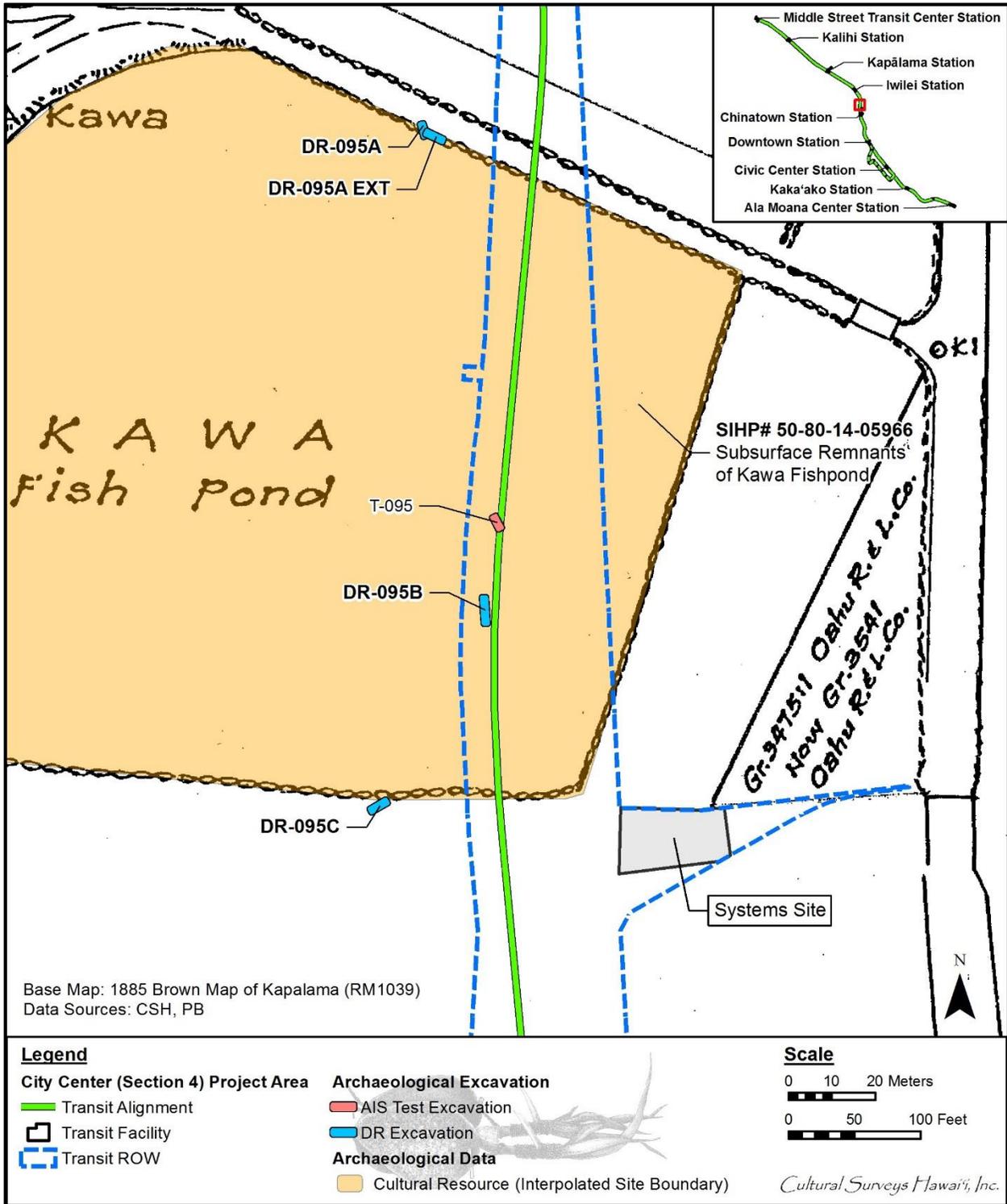


Figure 12. 1885 Brown map of Kapalama depicting data recovery test excavations within the former footprint of Kawa Fishpond

Kawa Fishpond layer contained abundant shell and two *kukui* nuts. No features were observed in this test excavation

T-95B was located within Higa Meat Market on North Nimitz Highway. It was oriented 8/188° TN. The test excavation ended up being 6.15 m long by 0.92 m wide, and it reached a maximum depth of 1.9 mbs. This test excavation was determined to have been previously heavily disturbed. The stratigraphy consisted solely of fill layers with no natural sediments encountered. No remnants of Kawa Fishpond were observed. One of the fill layers, a compacted and oiled surface, may represent a former historic road or land surface.

T-95C was located between Awa Street and North Nimitz Highway. It was oriented 60/246° TN. The test excavation ended up being 4.4 m long by 1 m wide, and it reached a maximum depth of 2.13 mbd. This test excavation was determined to have been previously heavily disturbed. The stratigraphy consisted solely of fill layers with no natural sediments encountered. No remnants of Kawa Fishpond were observed. Petroleum contamination was noted around 150 cmbd.

Two of the four test excavations within the former footprint of Kawa Fishpond yielded remnants of the fishpond and earlier lagoonal sediments, while the other two test excavations yielded heavy disturbance with multiple historic fill layers completely removing any trace of Kawa Fishpond.

#### **SIHP # -7190**

The planned data recovery of SIHP # -7190 (subsurface salt pan remnants) involved the excavation of one 12-m long by 1-m wide test excavation. The test excavation location was based on the locations of anticipated project ground disturbance and avoidance of subsurface utilities.

T-229A was located in the *mauka* lane of Pohukaina Street near the Keawe Street intersection. It was oriented 138/318° TN. The test excavation ended up being 11.6 m long by 0.91 m wide, and it reached a maximum depth of 1.3 mbs. T-229A documented two sandy clay berms that are believed to represent remnant salt pan berms, similar to that documented in T-229 of the AIS. T-229A also documented a layer associated with SIHP # -7189 (a subsurface burnt trash deposit) directly overlying the berms. SIHP # -7189 was identified during the project's AIS, but was not selected for data recovery. A large wood post, possibly a remnant telephone pole or lamp post, was observed in a test excavation sidewall.

#### **SIHP # -7427**

The planned data recovery of SIHP # -7427 (subsurface historic infrastructure remnants, subsurface cultural deposits, and a human skeletal element) involved the excavation of three 4-m long by 1-m wide test excavations located east of Nimitz Highway near the Kekaulike Street intersection and within the proposed location of the Chinatown Station. In actuality, five data recovery test excavations were completed. Test excavation locations were based on the locations of anticipated project ground disturbance, avoidance of subsurface utilities, and the identified locations of targeted cultural resource components (such as culturally enriched strata).

T-99A was oriented 144/324° TN. The test excavation ended up being 6.2 m long by 1.1 m wide, and it reached a maximum depth of 0.97 mbs. This trench was shifted 1.55 m to the southeast of the planned location in order to avoid utilities and maintain planned test excavation dimensions. An additional section of Feature 10 from the AIS, a concrete floor (possible building foundation), was further documented within this test excavation (Figure 13). A gravelly clay imported fill layer was documented overlying Feature 10. It contained metal and rubber pieces, a metal utility pipe, and three metal rods. The excavation of T-99A could not be completed past 0.97 mbs due to the

Re: End of Fieldwork Letter Report for ADR for the H RTP—City Center



Figure 13. Photograph of SIHP # -7427 Feature 10, concrete floor, within T-99A



Figure 14. Photograph of large boulders creating voids and instability in T-99A

presence of extremely large boulders that created voids resulting in instability and which prevented shoring of the test excavation (Figure 14).

T-100A was oriented 70/250° TN. The test excavation ended up being 5.35 m long by 1.1 m wide, and it reached a maximum depth of 1.62 mbd. An additional section of Feature 10 from the AIS, a concrete floor (possible building foundation), was further documented within this test excavation (Figure 15). A new feature (Feature 15), a mortared brick structure situated atop large basalt boulders, was documented in the northeast end of the test excavation (Figure 16). This feature is similar to another brick wall feature, Feature 1, identified in T-96 during the AIS. This feature is a possible late nineteenth century building foundation. The excavation of T-100A could not be completed past 1.62 mbd due to the presence of large boulders that created voids resulting in instability and which prevented shoring of the test excavation.

T-100B was added to further explore and document Feature 15. It was oriented 70/250° TN and abutted T-100A to the east. The test excavation was 4.25 m long by 1.1 m wide, and it reached a maximum depth of 1.3 mbd. Additional portions of both Features 10 and 15 were encountered (Figure 17 and Figure 18). Window glass and ceramic fragments were collected from sediment surrounding and possibly associated with Feature 15. A new feature (Feature 21), a wired concrete and steel I-beam column support, was documented within the test excavation on top of Feature 10 (Figure 19). The excavation of T-100B could not be completed past 1.3 mbd due to the presence of large boulders that created voids resulting in instability and which prevented shoring of the test excavation.

T-101A was oriented 5/185° TN. The test excavation ended up being 5.5 m long by 1.1 m wide, and it reached a maximum depth of 1.92 mbd. The test excavation was shifted 85 cm Diamond Head to avoid an existing utility. T-101A documented several culturally-enriched fill strata. One of the strata appeared to be locally procured natural alluvium used as fill. It contained abundant marine shells, historic artifacts, faunal bone, indeterminate (cannot be determined as to whether it is human or faunal) bone fragments, and a probable human vertebra fragment. Another fill stratum was composed of gravelly sandy silt loam and contained historic artifacts, shell, and a probable human rib fragment. Another fill layer was a burned trash deposit containing historic artifacts, faunal bone, and a possible human long bone shaft fragment. Another layer was composed of gravelly sandy loam fill and contained scattered coral and basalt boulders, historic artifacts, faunal bone, and indeterminate bone. An additional layer appears to be the heavily disturbed upper portion of the natural alluvium present in the area. It contained abundant faunal bone, historic artifacts, and slag. No historic structural remnants were observed in this test excavation.

T-101B was oriented 84/264° TN. The test excavation ended up being 4.25 m long by 0.92 m wide, and it reached a maximum depth of 2.12 mbs. This test excavation documented five new features (16–20), including two coral concentrations, a historic trash pit containing artifacts and faunal bone, an indeterminate pit containing faunal bone and organic material, and a flat, prepared former land surface containing faunal bone and historic artifacts. An additional portion of Feature 14 from the AIS, a historic trash pit, was also documented. It contained artifacts and faunal bone. No historic structural remnants were observed in this test excavation.

The five data recovery test excavations within SIHP # 7427 identified additional subsurface historic infrastructure remnants, subsurface cultural deposits, and isolated human skeletal remains. An additional seven features associated with this archaeological cultural resource were documented, and two previously-identified features were further documented.



Figure 15. Photograph of SIHP # -7427 Feature 10, concrete floor, within T-100A



Figure 16. Photograph of SIHP # -7427 Feature 15, mortared brick structure, within T-100A



Figure 17. Photograph of SIHP # -7427 Feature 10, concrete floor, within T-100B



Figure 18. Photograph of SIHP # -7427 Feature 15, mortared brick structure, within T-100B



Figure 19. Photograph of SIHP # -7427 Feature 21, mortared brick structure, within T-100B

### **SIHP # -7428**

The planned data recovery of SIHP # -7428 (subsurface cultural deposit and subsurface infrastructure remnants) involved the excavation of three 6-m long by 1-m wide test excavations. Test excavation locations were based on the locations of anticipated project ground disturbance, avoidance of subsurface utilities, and targeted areas of pit feature concentrations (i.e., within the vicinity of T-120 and T-120A).

T-120C was located on the sidewalk of Halekauwila Street fronting the Federal Department of Labor office. It was oriented 146/326° TN. The test excavation ended up being 6.57 m long by 0.91 m wide, and it reached a maximum depth of 1.55 mbs. This test excavation documented a culturally enriched A horizon and 19 associated features that extended into underlying natural Jaucas sand. The upper boundary of the cultural layer was truncated and disturbed. The cultural layer contained charcoal, faunal bone, and Traditional Hawaiian artifacts (a shell fishhook and an *ulu maika*). The features contained items such as charcoal, shell, FAR, burned coral, basalt cobbles, and faunal bone. Most of the features are indeterminate pits, but two possible fire pits and a concentration of basalt cobbles were documented.

T-120D was located on the sidewalk of Halekauwila Street fronting the Federal Department of Labor office. It was oriented 152/332° TN. The test excavation ended up being 6.8 m long by 0.91 m wide, and it reached a maximum depth of 1.55 mbs. This test excavation documented a culturally enriched A horizon and 12 associated features that extended into underlying natural Jaucas sand.

The upper boundary of the cultural layer appeared to be truncated and disturbed. The cultural layer contained faunal bone and Traditional Hawaiian artifacts. The features contained items such as Traditional Hawaiian and historic artifacts, basalt cobbles, charcoal, shell, and faunal bone. Most of the features are indeterminate pits, but a possible trash pit and a possible fire pit were documented.

T-120E was located on the sidewalk of Halekauwila Street fronting the Federal Department of Labor office. It was oriented 142/322° TN. The test excavation ended up being 6.8 m long by 0.92 m wide, and it reached a maximum depth of 1.53 mbs. This test excavation documented a culturally enriched A horizon and 15 associated features that extended into underlying natural Jaucas sand. The cultural layer contained charcoal, FAR, shell, basalt cobbles, water-worn cobbles, faunal bone, and Traditional Hawaiian and historic artifacts. The features contained cultural material such as charcoal, FAR, faunal bone, shell, historic and Traditional Hawaiian artifacts, and basalt and coral cobbles. Most of the features were indeterminate pits, but a possible *imu*/cooking pit and two charcoal concentrations were documented.

The three data recovery test excavations identified additional portions of the SIHP # -7428 cultural layer and 46 additional pit features. The cultural layer and associated features range from pre-Contact through historic times.

#### **SIHP # -7429**

The planned data recovery of SIHP # -7429 (a subsurface cultural deposit and a human skeletal element) involved the excavation of two 6-m long by 1-m wide test excavations. Test excavation locations were based on the locations of anticipated project ground disturbance and avoidance of subsurface utilities.

T-168C was located in the parking lot of a Ross Dress For Less store near the intersection of Ward Avenue and Queen Street. It was oriented 14/194° TN. The test excavation ended up being 6.1 m long by 0.91 m wide, and it reached a maximum depth of 1.98 mbs. T-168C documented a cultural layer and ten associated features. The cultural layer appears to have been impacted by multiple historic grading events. The layer contained charcoal, wood, faunal bone, shell, and historic artifacts. Most of the features were indeterminate pits, but a historic trash pit was documented. The features contained cultural material such as charcoal, shell, coral cobbles, wood, faunal bone, and historic artifacts. A fill layer above the cultural layer contained cut basalt stones (no formal arrangement) in addition to construction debris (Figure 20).

T-168D was located in the parking lot of a Ross Dress For Less store near the intersection of Ward Avenue and Queen Street. It was oriented 14/194° TN. The test excavation ended up being 6.1 m long by 0.93 m wide, and it reached a maximum depth of 2.05 mbs. T168D documented two culturally-enriched layers with 15 associated features. The upper cultural layer appeared to be a fill layer that was utilized as a historic land surface. It evinced a strong petroleum smell and had one associated feature. The lower cultural layer formed on natural Jaucas sand and had 14 associated features. The cultural layers contained shell, faunal bone, and historic artifacts. All of the features appeared to be indeterminate pits and contained cultural material such as basalt cobbles, shell, faunal bone, charcoal, slag, and historic artifacts.

Both data recovery test excavations identified cultural layers designated as part of SIHP # -2918. An additional 25 associated pit features were documented.



Figure 20. Photograph of cut basalt block from within a fill layer in T-168C

### **Additional Human Remains (*Iwi Kūpuna*) Documented During Data Recovery**

During the City Center (Section 4) AIS, *iwi kūpuna* were identified in seven specific test excavations falling within four out of the 19 total designated cultural resources existing within, or immediately adjacent to, the City Center AIS study area. *Iwi kūpuna* identified during the City Center AIS were found within SIHP #s -2918 (two identifications of *iwi kūpuna* within T-226C and T-227A), -5820 (three identifications of *iwi kūpuna* within T-141, T-142, and T-150), -7427 (one identification of *iwi kūpuna* within T-096), and -7429 (one identification of *iwi kūpuna* within T-170).

Subsequent data recovery excavations were carried out at four cultural resources containing *iwi kūpuna* that were identified during the City Center AIS (SIHP #s -2918, -5820, -7427, and -7429) as well as for an additional four historic properties (SIHP #s -2963, -5966, -7190, and -7428) (see Yucha et al. 2014). HART and SHPD agreed that should *iwi kūpuna* be encountered during data recovery investigations, these *iwi kūpuna*, like the *iwi kūpuna* encountered during the AIS, would be considered previously identified per HRS §13-300 (Yucha et al. 2014:4). During data recovery in these eight historic properties, additional *iwi kūpuna* were identified in three specific data recovery excavations falling within SIHP #s -2918 and -7427: in # -2918, there was one

identification of *iwi kūpuna* within T-226E and one identification of *iwi kūpuna* within T-226F; in # -7427, there was one identification of *iwi kūpuna* within T-101A. The *iwi kūpuna* finds and cultural resources identified during the City Center AIS and subsequent data recovery process are summarized in Table 2.

Table 2. Summary of *Iwi Kūpuna* Documented in the City Center AIS (Black) and DR (Blue)

SIHP # (50-80-14-)	General Location of Find	Test Excavation #	TMK	Nature of <i>Iwi Kūpuna</i> Find/Archaeological Context
2918	Located along Punchbowl Street near the Ala Moana intersection, <i>makai</i> of Pohukaina Street between Punchbowl and South Streets	T-226C	[1] 2-1-027-(plat)	At Feature 13 (a truncated burial pit), excavation ceased upon the discovery of human skeletal remains consisting of a pelvis with no articulating leg elements.
		T-226E	[1] 2-1-027 (plat)	Disarticulated and previously disturbed human bone fragments (a rib fragment and a parietal [skull] fragment) found within central portion of trench, immediately below sandy sediment containing fire-altered basalt rock, historic artifacts, marine shell midden, and charcoal.
		T-226F	[1] 2-1-027 (plat)	Disarticulated and previously disturbed human bone fragments (occipital bone, long bone, adult finger bone, child’s finger bone, and a vertebra; all fragments) uncovered within central portion of trench, immediately below sandy sediment containing fire-altered basalt rock, marine shell midden, and charcoal.
		T-227A	[1] 2-1-027 (plat)	Feature 27 consisted of human skeletal remains within Jaucas sand that were identified as a partial infant burial. The burial was determined to be an infant of 0–3 years based on the size and growth development of the remains.

SIHP # (50-80-14-)	General Location of Find	Test Excavation #	TMK	Nature of <i>Iwi kūpuna</i> Find/ Archaeological Context
5820	Located in the vicinity of Mother Waldron Park and Halekauwila Street, from Keawe Street to east of Ohe Street	T-141	[1] 2-1-051 (plat)	Disarticulated and scattered human skeletal remains were found within Feature 1 (a large pit with an in situ horse burial), Feature 31 (a pit feature), and the upper boundary of the Jaucas sand.
		T-142	[1] 2-1-051 (plat)	An in situ human burial within Jaucas sand was only minimally uncovered during a test excavation to confirm the presence of a burial. In addition, human skeletal fragments were found within Feature 6, consisting of two teeth and a small cancellous bone fragment.
		T-150	[1] 2-1-050:067	A single worked human tibia fragment utilized as a tool was encountered within Feature 18 (a pit feature), originating from the buried A horizon.
7427	Located 3 m east of Nimitz Highway near the Kekaulike Street intersection	T-096	[1] 1-7-002:025	A single previously disturbed human talus bone was encountered within fill sediment.
		T-101A	[1] 1-7-002:026	Human skeletal remains consisting of a vertebra fragment and a rib fragment found in central portion of trench within fill layers also containing faunal skeletal remains, bricks, nails, glass fragments, ceramics, and charcoal. Approximately 10–12 additional small, worn bone fragments (not definitively identifiable as human) were found in other fill layers of trench.

SIHP # (50-80-14-)	General Location of Find	Test Excavation #	TMK	Nature of <i>Iwi kūpuna</i> Find/ Archaeological Context
7429	Ross Dress for Less store adjacent throughway parking lot, located near the intersection of Ward Avenue and Queen Street	T-170	[1] 2-3-002:059	Feature 6 consisted of a single, isolated human cranial fragment, identified as a left temporal bone portion including the mastoid process and the root of the zygomatic arch, discovered in situ within the buried A horizon.

## Conclusion

As previously stated, the purpose of the data recovery investigation is to mitigate the project's effect on significant cultural resources. Data recovery fieldwork was performed in order to answer cultural resource-specific research questions. This data recovery investigation involved the excavation of 23 test excavations within eight cultural resources: SIHP #s 50-80-14-2918, subsurface cultural deposits including human burials and isolated human skeletal remains; -2963, a subsurface cultural deposit, subsurface pond sediments, human burials, and animal burials; -5820, subsurface cultural deposits including human burials; -5966, subsurface remnants of Kawa Fishpond; -7190, subsurface salt pan remnants; -7427, subsurface historic infrastructure remnants, subsurface cultural deposits, and isolated human skeletal remains; -7428, a subsurface cultural deposit and subsurface infrastructure remnants; and -7429, a subsurface cultural deposit and a human skeletal element. The data recovery investigation further documented all eight cultural resources. Isolated human skeletal remains were identified from SIHP #s -2918 and -7427.

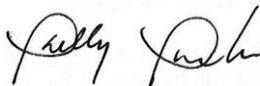
Data recovery methods followed the procedures outlined in the SHPD-accepted data recovery plan (Yucha et al. 2014). Minor changes were made in test excavation size and placement. Three additional data recovery test excavations were added during fieldwork in order to compensate for test excavations that could not be completed due to safety issues and to further document subsurface features. Two test excavations were added to further investigate SIHP # -7427 and one test excavation was added to further investigate SIHP # -5966.

Per the data recovery plan, the data recovery investigation involved 100% collection of feature fill, a 25% screened sample of culturally-enriched sediments, bulk samples from each incremental level of a cultural deposit, periodic column samples, and hand collection of observed charcoal, artifacts, and faunal remains. A total of 199 features were documented among the eight cultural resources. The total number of individual sample bags to be processed is 1,284. Laboratory analysis of these samples is currently underway and involves screening, sorting, identifying, weighing, and cataloguing the collected material. Specialized analyses will include wood taxa identification, radiocarbon analysis, palynological analysis, resistivity analysis, and Energy Dispersive X-Ray Fluorescence (EDXRF) analysis. These analyses should be able to provide detailed information regarding land use and more precise date ranges for each cultural resource.

Pursuant to HRS §13-13-275-9(d), CSH requests verification of completion of the detailed mitigation plan, thus allowing construction to proceed. The comprehensive archaeological data recovery report is currently being prepared and will be submitted upon completion.

If you have any questions or comments, please feel free to call Matt McDermott, Principal Investigator of this project, at (808) 262-9972 or toll free at 1-800-599-9962. You may also reach Matt by e-mail at [mmcdermott@culturalsurveys.com](mailto:mmcdermott@culturalsurveys.com).

Sincerely,



Kelly L. Burke, M.Sc.  
Archaeologist/Osteologist  
Cultural Surveys Hawai'i, Inc.

---

**References****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 Ahupua‘a, Honolulu (Kona) District, Island of O‘ahu, TMK [1] 1-2, 1-5, 1-7, 2-1, 2-3 (Various Plats and Parcels).* Cultural Surveys Hawai‘i, Inc., Kailua, Hawai‘i.

**Hammatt, Hallett H. and David W. Shideler**

2013 *Interim Protection Plan for the Honolulu High-Capacity Transit Corridor Project.* Cultural Surveys Hawai‘i, Inc., Kailua, Hawai‘i.

**Hammatt, Hallett H., Constance O‘Hare, John Tulchin, David 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 Ahupua‘a, Honolulu District, Island of O‘ahu, TMK [1] 1-2, 1-5, 1-7, 2-1, 2-3 (Various Plats and Parcels)* Cultural Surveys Hawai‘i, Inc. Kailua, Hawai‘i.

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 Ahupua‘a, Honolulu District, Island of O‘ahu, 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 Kamake‘e Streets (Hammatt et al. 2011).* Cultural Surveys Hawai‘i, Inc., Kailua, Hawai‘i.

**Yucha, Trevor, Matt McDermott, David W. Shideler, and Hallett H. Hammatt**

2014 *Archaeological Data Recovery Plan for Eight Historic Properties (SIHP #s 50-80-14-2918, -2963, -5820, -5966, -7190, -7427, -7428, and -7429) in the City Center (Section 4) of the Honolulu High-Capacity Transit Corridor Project, Honolulu Ahupua‘a, Honolulu (Kona) District, Island of O‘ahu, TMKs: [1] 1-5, 2-1, and 2-3 (Various Plats and Parcels).* Cultural Surveys Hawai‘i, Inc., Kailua, Hawai‘i.

NEIL ABERCROMBIE  
GOVERNOR OF HAWAII



**HISTORIC PRESERVATION DIVISION  
DEPARTMENT OF LAND AND NATURAL RESOURCES**

601 Kamokila Boulevard, Suite 555  
Kapolei, HI 96806

**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

October 27, 2014

Kawika Farm, Cultural Planner  
Honolulu Authority for Rapid Transportation  
1099 Alakea Street, Suite 1700  
Honolulu, Hawaii 96813

LOG NO: 2014.04277  
DOC NO: 1410SL29  
Archaeology

Dear Mr. Farm:

**SUBJECT: Chapter 6E-8 and National Historic Preservation Act (NHPA) Section 106 Review –  
End of Fieldwork Letter Report for Archaeological Data Recovery of Eight Historic Properties  
(SIHP #s 50-80-14-2918, -2963, 5820, -5966, -7190, -7427, -7428, and -7429) in the City Center  
(Section 4) of the Honolulu Rapid Transit Project (HRTTP)  
Kalihi, Kapālama, Honolulu, and Waikīkī Ahupua‘a, Honolulu (Kona) District, Island of O‘ahu  
TMKs: (1) 1-5, 2-1, and 2-3 (various)**

Thank you for the opportunity to review this draft report titled *End of Fieldwork Letter Report for Archaeological Data Recovery of Eight Historic Properties (SIHP #s 50-80-14-2918, -2963, 5820, -5966, -7190, -7427, -7428, and -7429) in the City Center (Section 4) of the Honolulu Rapid Transit Project (HRTTP) Kalihi, Kapālama, Honolulu, and Waikīkī Ahupua‘a, Honolulu (Kona) District, O‘ahu TMKs:[1] 1-5, 2-1, and 2-3 (Various Plats and Parcels)* (Burke, September 2014). We received this submittal on September 17, 2014. The archaeological inventory survey (AIS) report for City Center (Section 4) was reviewed and accepted by SHPD on August 26, 2013 (Log No. 2013.2564, 2013.4338; Doc. No. 1308SL21). The data recovery plan (DRP) for City Center (Section 4) was reviewed and accepted by SHPD on January 13, 2014 (Log No. 2014.00077, Doc. No. 1401SL05)

The data recovery (DR) mitigation addresses eight historic properties in the eastern-most 4.3 miles (6.9 km) of the Honolulu High-Capacity Transit Corridor. The project area and Area of Potential Effect (APE) acreages covered by the data recovery correlate with the project's direct ground disturbance which consists of about 604,289 square feet or 13.87 acres. The end of fieldwork data recovery letter report provides an adequate discussion of the regulatory context; the eight historic properties; the data recovery research questions, data requirements, and sampling strategies; the general field findings, and the anticipated laboratory methods and analyses. The DR findings are summarized in Table 1 (below).

This end of fieldwork data recovery letter report meets the requirements of Hawaii Administrative Rule (HAR) §13-275-9(d)(1) and the *Secretary of the Interior's Standards for Archaeological Documentation*. The end of fieldwork data recovery letter report 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 me at (808) 692-8019 or at [Susan.A.Lebo@hawaii.gov](mailto:Susan.A.Lebo@hawaii.gov) if you have any questions or concerns regarding this letter.

Aloha,

A handwritten signature in black ink that reads "Susan A. Lebo".

Susan A. Lebo, PhD  
Oahu Lead Archaeologist

cc: Matt McDermott, Projects Manager, Cultural Surveys Hawaii, Inc. ([mmcdermott@culturalsurveys.com](mailto:mmcdermott@culturalsurveys.com))

Table 1. Eight Historic Properties Investigated During Data Recovery

SIHP 50-80-14-	Description	DR Units	DR Findings	Significance (HR/NR)
2918	Cultural deposit, human burials	T-226E, T-226F, T-227C	89 additional pit features, isolate human remains in T-226E, T-226F	d, e / D
2963	Cultural deposit, pond sediments, human burials, animal burials	T-122B, T-123A	Pond sediments in both T-122B, T-123A	d, e / D
5820	Cultural deposit, human burials	T-150A, T-150B, T-150C	32 additional pit features in all three units	d, e / D
5966	Kawa Fishpond	T-95A, T-95A ext., T-95B, T-95C	Pond sediments in T-95A and T-95A ext.	d / D
7190	Salt pan remnants	T-229A	2 salt pan berms assoc. w/SIHP 7190; trash layer assoc. w/SIHP 7189	d / D
7427	Infrastructure remnants, cultural deposits, human skeletal element	T-99A, T-100A, T-110B, T-101A, T-101B	7 newly-identified features and 2 previously-identified documented	d, e / D
7428	Cultural deposit, infrastructure remnant	T-120C, T-120D, T-120E	46 additional pit features	d / D
7429	Cultural deposit, human skeletal element	T-168C, T-168D	25 additional pit features	d, e / D



October 28, 2014

Mr. Ted Matley  
Federal Transit Administration  
Region 9  
201 Mission Street, Suite 1650  
San Francisco, CA 94105-1839

Mr. Paul Cleghorn  
Kāko'o  
Pacific Legacy, Inc.  
30 Aulike Street, Suite 301  
Kailua, HI 96734

**RE: Honolulu High Capacity Transit Corridor Project Programmatic Agreement,  
Honolulu, Hawai'i  
Stipulation IX Measures to Address Reasonably Foreseeable Indirect and  
Cumulative Effects Caused by the Project**

Dear Mr. Matley and Mr. Cleghorn:

Historic Hawai'i Foundation ("HHF"), a consulting party to the Programmatic Agreement ("PA") for the Honolulu High Capacity Transit Corridor Project ("Project"), has identified a significant adverse indirect or cumulative effect on a resource determined eligible for the National Register of Historic Places that was not evaluated in the PA.

Written Notification Per Stipulation IX. D and I.H.10

Pursuant to PA Stipulations IX.D and I.H.10, Historic Hawai'i Foundation is providing this letter as notice to the Federal Transit Administration ("FTA") and the PA Program Manager ("Kāko'o") of the significant adverse effect and requesting that FTA call a meeting of the consulting parties to discuss what next steps would be appropriate under the new circumstances to mitigate the effects on the historic resource (see Stip. IX.D).

This letter follows on the initial written notification provided via email to FTA, Kāko'o, the Signatories and Consulting Parties on October 14, 2014.

Identification of Historic Property

The subject property is the historic Honolulu Advertiser Building, located at 605 Kapi'olani Boulevard (with alternative addresses of 801 South Street and 610 Kawaiaha'o Street), Honolulu, Hawai'i (TMK 2-1-047:003).

Historic Hawai'i Foundation Notice to FTA and Kāko'o  
Honolulu High Capacity Transit Corridor Project  
Stipulation IX. D and I.H.10  
Cumulative and Indirect Effects  
October 27, 2014  
Page 1 of 5

The “Historic Architecture Assessment: The Honolulu Advertiser Building” (June 2005, prepared by Mason Architects, Inc. for Gannett Corporation) included an assessment of significance using the National Register of Historic Places criteria (36 CFR 60). The Honolulu Advertiser Building (“News Building”) was constructed in 1929 for the newspaper’s publishing, news, printing, and circulation functions, and also housed a radio station. The assessment found that the News Building is eligible for the National Register under Criterion A for associations with *The Honolulu Advertiser*; under Criterion B for associations with Lorrin A. Thurston; and under Criterion C as a rare surviving example of the Beaux-Arts Revival architecture in Hawai‘i and as representative of the “work of a master”: the Honolulu architecture firm of Emory & Webb (Mason, pages 8-10). The parcel also contained a later-period concrete building constructed in 1963 to house the printing press, circulation and paper-storage facilities (“Press Building”).

The State Historic Preservation Division (“SHPD”) of the Hawai‘i State Department of Land and Natural Resources (“DLNR”) concurred with the determination of eligibility via written correspondence on October 9, 2013 and on October 11, 2013.

#### Identification of Adverse Effect

The current property owner, Downtown Capital, LLC, submitted a development permit application to the Hawai‘i Community Development Authority (“HCDA”) for Phase A of a development known as 801 South Street Building A on or about Sept. 12, 2012, which included the demolition of the Press Building .

HCDA approved the development permit application for Phase A on or about December 5, 2012. The demolition permit was issued on April 30, 2013 and the job was completed on October 22, 2013 (Permit #A2013-04-2443).

There is no record of SHPD’s concurrence with this demolition. In fact, in a letter from SHPD to HCDA dated August 29, 2013 SHPD states that “neither the owners nor HCDA followed the Statutes or the Administrative Rules and our written request for consultation and mitigation was ignored.”

Downtown Capital, LLC submitted a second development permit application to HCDA for Phase B, which included demolition of a substantial portion of the News Building on or about August 12, 2013.

HHF notified both HCDA and SHPD of its interest in the project and concern for the treatment of historic properties via written letter on August 8, 2013 and explicitly requested to be a consulting party under both Section 106 of the National Historic Preservation Act and under HRS 6E; HAR 13-275-7. However, neither HCDA nor SHPD initiated consultation on the development permit application. It was the subject of two public hearings, on October 2, 2013 and December 4, 2013. HHF submitted both written and verbal testimony in opposition to the demolition of the historic property.

Demolition is a significant adverse effect to a historic property. HCDA identified the proposed demolition as an adverse effect in written correspondence to DLNR on November 25, 2013. The State Historic Preservation Officer issued a letter of concurrence for demolition of the News Building dated December 2, 2013.

HCDA approved the development permit on or about December 4, 2013. The demolition permit was applied for on December 11, 2013; issued February 12, 2014; and the job was completed July 17, 2014 (Permit #A2013-12-0918).

#### Relevance to the Honolulu High-Capacity Corridor Project

The Project's Civic Center Station is located at South Street and Halekauwila Street, which is less than one-quarter mile from the historic News Building at South Street between Kawaiha'ō Street and Kapi'olani Boulevard. The Kaka'ako Station at Ward Avenue and Halekauwila Street is approximately one-half mile from the historic property.

In May 2013, HCDA released a public review draft of its "Transit Oriented Development (TOD) Overlay Plan." The "Opportunities of Civic Center Station Integration" section (page 7-21) quotes the HART Station Area Development Potential Report (2011) that "Civic Center Station has perhaps the greatest (redevelopment) potential of any station along the project alignment excluding the West O'ahu stations." The accompanying illustrations indicate that parcels along South Street are "TOD Opportunity Sites." The "Opportunities for Kaka'ako Station Integration" (page 7-19) "envisions this area as a mixed-use, high-rise neighborhood."

An explicit connection was made during the public testimony on the 801 South Street development proposal that linked the high-density residential development to the anticipation of nearby transit stations. The two high-rise residential towers and associated parking structures led directly to the demolition of most of the historic News Building and all of the Press Building.

Therefore, HHF concludes that the Honolulu Transit Project is a contributing cause for the adverse effect on the historic property, and that the demolition of the News and Press Buildings are both cumulative and indirect adverse effects of the Project that were not addressed by the PA.

#### Stipulation to Address Reasonably Foreseeable Indirect and Cumulative Effects Caused by the Project

The 11<sup>th</sup> Whereas clause of the PA notes that "adverse effects may include reasonably foreseeable effects caused by the Project that may occur later in time, be farther removed in distance, or be cumulative;" and the 17<sup>th</sup>, 18<sup>th</sup>, 19<sup>th</sup> and 20<sup>th</sup> Whereas clauses reference transit oriented development as a specific issue relevant to the PA.

Stipulation IX of the Programmatic Agreement includes measures to address indirect and cumulative effects. Stipulation IX.C. states that the City "shall monitor the proposed demolition of resources built before 1969 within the APE and within a 2,000-foot radius of each station." The News and Press Buildings are located approximately 1100 linear feet from the Civic Center Station location.

The HART annual report issued in January 2014 for the prior calendar year (2013) disclosed the demolition of the Press Building, but failed to note that it was associated with Transit Oriented Development. The Report failed to disclose the proposed demolition of the News Building, despite the fact that the development permit application and associated demolition of a historic property had been submitted to the government in August 2013. The HART Semi-Annual Report dated July 2014 did not disclose the demolition of the majority of the News Building.

Stipulation IX.D. states that “if consulting parties identify during the duration of this PA that a significant adverse indirect or cumulative effect on a resource determined eligible for the National Register as part of the Section 106 processes for this project was not evaluated in this PA, the consulting party shall follow procedures identified in Stipulation I. H.10. Upon such notification, FTA will call a meeting of the consulting parties to discuss what next steps would be appropriate under the circumstances to mitigate the effects on such resources.”

Stipulation I.X.10 states that the Kāko‘o “shall perform the following responsibilities...collect any comments from the consulting parties that identify impacts different from those stated in this PA to historic properties located within the APE for City and FTA processing. The Kāko‘o shall research the issues presented...and prepare a recommendation for the disposition of the request and action by FTA...”

We note that Stipulation I.X.10 refers to a notification process outlined in “Appendix A of this PA.” However, no such appendix was provided with the executed PA, is not referenced as an exhibit or attachment to the PA, and is not available on the project website with other documentation related to the PA or Section 106 consultation. If you can provide this documentation, we will submit this notice and request per those procedures.

### Conclusions

Throughout the Section 106 consultation process that led to the development of the Programmatic Agreement, HHF repeatedly raised the issue and concern that the urban development enabled by the Project would lead to adverse effects and irreparable harm to historic resources. FTA and the City addressed the issue by including stipulations that provided a “wait and see” approach, with the hope and expectation that existing planning, permitting and development agencies would follow through on their preservation responsibilities.

Unfortunately, we have seen that approach has failed to protect this historic property. In fact, the development permit application for this project is the subject of litigation between the adjacent property owner and HCDA. On May 30, 2014, Judge Karl Sakamoto of the First Circuit Court gave an oral ruling in favor of the Royal Capitol Plaza Association of Apartment Owners in its litigation against the development on the site of the former Honolulu Advertiser building. The plaintiffs filed a claim against HCDA based on the state agency’s failure to protect historic properties as required by state law and regulation, as well as other claims related to non-historic preservation matters. In his oral ruling, Judge Sakamoto said that “vital steps” in the historic preservation review process were skipped in violation of state law (HRS 6E), and issued a written order on August 5, 2014 with specific findings that HCDA violated historic preservation law.

In the absence of meaningful measures from the State agencies to protect these historic properties, it is necessary to revisit the Programmatic Agreement for measures to avoid, minimize and mitigate cumulative and indirect adverse effects that are being caused by the Project, such as in the transit oriented development areas.

We look forward to your timely response and prompt attention to this matter.

Very truly yours,



Kiersten Faulkner, AICP  
Executive Director

Copies via email:

FTA: Mary Nguyen

HART: Dan Grabauskas, Brennon Morioka, Liz Scanlon, Jon Nouchi, Stanley Solamillo

ACHP: Reid Nelson, Charlene Vaughan, Blythe Semmer

SHPD: Alan Downer, Jessica Puff

NAVY: John Lohr, Jeff Dodge, Charlene Oka-Wong

NTHP: Betsy Merritt

NPS: Elaine Jackson-Retondo, Paul DePrey, Melia Lane-Kamehele

OIBC: Hinaleimoana Wong-Kalu

AHCC: Mahealani Cypher

OHA: Jerry Norris

## Silva, Josh/HNL

---

**From:** Stanley Solamillo <ssolamillo@gmail.com>  
**Sent:** Tuesday, February 24, 2015 6:06 AM  
**To:** Silva, Josh/HNL  
**Subject:** Fwd: Holau Market NRHP  
**Attachments:** Holau Mkt\_Ai\_Goto Bldg NRHP 103114.pdf

FYI

----- Forwarded message -----

**From:** Stanley Solamillo <[ssolamillo@gmail.com](mailto:ssolamillo@gmail.com)>  
**Date:** Fri, Oct 31, 2014 at 5:03 PM  
**Subject:** Fwd: Holau Market NRHP  
**To:** [Jessica.L.Puff@hawaii.gov](mailto:Jessica.L.Puff@hawaii.gov)

Aloha, Jessica:

Attached please find the draft NRHP nomination for Holau Market and the Ai-Goto Buildings. The hard copy with color photos will be sent to you via snail mail. I would like to schedule the nomination for public hearing at the next available meeting (January 2015?)

Mahalo as always,  
Stanley



November 4, 2014

Mr. Ted Matley  
Federal Transit Administration  
Region 9  
201 Mission Street, Suite 1650  
San Francisco, CA 94105-1839

Mr. Michael Formby  
Department of Transportation Services  
City & County of Honolulu  
650 South King Street, Third Floor  
Honolulu, HI 96813-3017

Mr. Paul Cleghorn  
Kāko'o  
Pacific Legacy, Inc.  
30 Aulike Street, Suite 301  
Kailua, HI 96734

**RE: Honolulu High Capacity Transit Corridor Project Programmatic Agreement,  
Honolulu, Hawai'i  
Stipulation IX Measures to Address Reasonably Foreseeable Indirect and  
Cumulative Effects Caused by the Project**

Dear Mr. Matley, Mr. Formby and Mr. Cleghorn:

Historic Hawai'i Foundation ("HHF"), a consulting party to the Programmatic Agreement ("PA") for the Honolulu High Capacity Transit Corridor Project ("Project"), has identified a significant adverse indirect or cumulative effect on a resource determined eligible for the National Register of Historic Places that was not evaluated in the PA.

Written Notification Per Stipulation IX. D and I.H.10

Pursuant to PA Stipulations IX.D and I.H.10, Historic Hawai'i Foundation is providing this letter as notice to the Federal Transit Administration ("FTA") and the PA Program Manager ("Kāko'o") of the significant adverse effect and requesting that FTA call a meeting of the consulting parties to discuss what next steps would be appropriate under the new circumstances to mitigate the effects on the historic resource (see Stip. IX.D).

Historic Hawai'i Foundation Notice to FTA and Kāko'o  
Honolulu High Capacity Transit Corridor Project  
Stipulation IX. D and I.H.10  
Cumulative and Indirect Effects  
October 28, 2014; revised November 4, 2014  
Page 1 of 5

This letter follows on the initial written notification provided via email to FTA, Kāko‘o, the Signatories and Consulting Parties on October 14, 2014.

#### Identification of Historic Property

The subject property is the historic Honolulu Advertiser Building, located at 605 Kapi‘olani Boulevard (with alternative addresses of 801 South Street and 610 Kawaiaha‘o Street), Honolulu, Hawai‘i (TMK 2-1-047:003).

The “Historic Architecture Assessment: The Honolulu Advertiser Building” (June 2005, prepared by Mason Architects, Inc. for Gannett Corporation) included an assessment of significance using the National Register of Historic Places criteria (36 CFR 60). The Honolulu Advertiser Building (“News Building”) was constructed in 1929 for the newspaper’s publishing, news, printing, and circulation functions, and also housed a radio station. The assessment found that the News Building is eligible for the National Register under Criterion A for associations with *The Honolulu Advertiser*; under Criterion B for associations with Lorrin A. Thurston; and under Criterion C as a rare surviving example of the Beaux-Arts Revival architecture in Hawai‘i and as representative of the “work of a master”: the Honolulu architecture firm of Emory & Webb (Mason, pages 8-10). The parcel also contained a later-period concrete building constructed in 1963 to house the printing press, circulation and paper-storage facilities (“Press Building”).

The State Historic Preservation Division (“SHPD”) of the Hawai‘i State Department of Land and Natural Resources (“DLNR”) concurred with the determination of eligibility via written correspondence on October 9, 2013 and on October 11, 2013.

#### Identification of Adverse Effect

The current property owner, Downtown Capital, LLC, submitted a development permit application to the Hawai‘i Community Development Authority (“HCDA”) for Phase A of a development known as 801 South Street Building A on or about Sept. 12, 2012, which included the demolition of the Press Building .

HCDA approved the development permit application for Phase A on or about December 5, 2012. The demolition permit was issued on April 30, 2013 and the job was completed on October 22, 2013 (Permit #A2013-04-2443).

There is no record of SHPD’s concurrence with this demolition. In fact, in a letter from SHPD to HCDA dated August 29, 2013 SHPD states that “neither the owners nor HCDA followed the Statutes or the Administrative Rules and our written request for consultation and mitigation was ignored.”

Downtown Capital, LLC submitted a second development permit application to HCDA for Phase B, which included demolition of a substantial portion of the News Building on or about August 12, 2013.

HHF notified both HCDA and SHPD of its interest in the project and concern for the treatment of historic properties via written letter on August 8, 2013 and explicitly requested to be a consulting party under both Section 106 of the National Historic Preservation Act and under HRS 6E; HAR 13-275-7. However, neither HCDA nor SHPD initiated consultation on the development permit application. It was the subject of two public hearings, on October 2, 2013 and December 4, 2013. HHF submitted both written and verbal testimony in opposition to the demolition of the historic property.

Demolition is a significant adverse effect to a historic property. HCDA identified the proposed demolition as an adverse effect in written correspondence to DLNR on November 25, 2013. The State Historic Preservation Officer issued a letter of concurrence for demolition of the News Building dated December 2, 2013.

HCDA approved the development permit on or about December 4, 2013. The demolition permit was applied for on December 11, 2013; issued February 12, 2014; and the job was completed July 17, 2014 (Permit #A2013-12-0918).

#### Relevance to the Honolulu High-Capacity Corridor Project

The Project's Civic Center Station is located at South Street and Halekauwila Street, which is less than one-quarter mile from the historic News Building at South Street between Kawaiaha'o Street and Kapi'olani Boulevard. The Kaka'ako Station at Ward Avenue and Halekauwila Street is approximately one-half mile from the historic property.

In May 2013, HCDA released a public review draft of its "Transit Oriented Development (TOD) Overlay Plan." The "Opportunities of Civic Center Station Integration" section (page 7-21) quotes the HART Station Area Development Potential Report (2011) that "Civic Center Station has perhaps the greatest (redevelopment) potential of any station along the project alignment excluding the West O'ahu stations." The accompanying illustrations indicate that parcels along South Street are "TOD Opportunity Sites." The "Opportunities for Kaka'ako Station Integration" (page 7-19) "envisions this area as a mixed-use, high-rise neighborhood."

An explicit connection was made during the public testimony on the 801 South Street development proposal that linked the high-density residential development to the anticipation of nearby transit stations. The two high-rise residential towers and associated parking structures led directly to the demolition of most of the historic News Building and all of the Press Building.

Therefore, HHF concludes that the Honolulu Transit Project is a contributing cause for the adverse effect on the historic property, and that the demolition of the News and Press Buildings are both cumulative and indirect adverse effects of the Project that were not addressed by the PA.

#### Stipulation to Address Reasonably Foreseeable Indirect and Cumulative Effects Caused by the Project

The 11<sup>th</sup> Whereas clause of the PA notes that "adverse effects may include reasonably foreseeable effects caused by the Project that may occur later in time, be farther removed in distance, or be

cumulative;” and the 17<sup>th</sup>, 18<sup>th</sup>, 19<sup>th</sup> and 20<sup>th</sup> Whereas clauses reference transit oriented development as a specific issue relevant to the PA.

Stipulation IX of the Programmatic Agreement includes measures to address indirect and cumulative effects. Stipulation IX.C. states that the City “shall monitor the proposed demolition of resources built before 1969 within the APE and within a 2,000-foot radius of each station.” The News and Press Buildings are located approximately 1100 linear feet from the Civic Center Station location.

The HART annual report issued in January 2014 for the prior calendar year (2013) disclosed the demolition of the Press Building, but failed to note that it was associated with Transit Oriented Development. The Report failed to disclose the proposed demolition of the News Building, despite the fact that the development permit application and associated demolition of a historic property had been submitted to the government in August 2013. The HART Semi-Annual Report dated July 2014 did not disclose the demolition of the majority of the News Building.

Stipulation IX.D. states that “if consulting parties identify during the duration of this PA that a significant adverse indirect or cumulative effect on a resource determined eligible for the National Register as part of the Section 106 processes for this project was not evaluated in this PA, the consulting party shall follow procedures identified in Stipulation I. H.10. Upon such notification, FTA will call a meeting of the consulting parties to discuss what next steps would be appropriate under the circumstances to mitigate the effects on such resources.”

Stipulation I.H.10 states that the Kāko‘o “shall perform the following responsibilities...collect any comments from the consulting parties that identify impacts different from those stated in this PA to historic properties located within the APE for City and FTA processing. The Kāko‘o shall research the issues presented...and prepare a recommendation for the disposition of the request and action by FTA...”

We note that Stipulation I.H.10 refers to a notification process outlined in “Appendix A of this PA.” However, no such appendix was provided with the executed PA, is not referenced as an exhibit or attachment to the PA, and is not available on the project website with other documentation related to the PA or Section 106 consultation. [Note: HHH received Appendix A via email on October 29, 2014 from Mr. Cleghorn; this letter has been amended from the original sent on Oct. 28 to include the Department of Transportation Services per the procedure.]

### Conclusions

Throughout the Section 106 consultation process that led to the development of the Programmatic Agreement, HHH repeatedly raised the issue and concern that the urban development enabled by the Project would lead to adverse effects and irreparable harm to historic resources. FTA and the City addressed the issue by including stipulations that provided a “wait and see” approach, with the hope and expectation that existing planning, permitting and development agencies would follow through on their preservation responsibilities.

Unfortunately, we have seen that approach has failed to protect this historic property. In fact, the development permit application for this project is the subject of litigation between the adjacent property owner and HCDA. On May 30, 2014, Judge Karl Sakamoto of the First Circuit Court gave an oral ruling in favor of the Royal Capitol Plaza Association of Apartment Owners in its litigation against the development on the site of the former Honolulu Advertiser building. The plaintiffs filed a claim against HCDA based on the state agency's failure to protect historic properties as required by state law and regulation, as well as other claims related to non-historic preservation matters. In his oral ruling, Judge Sakamoto said that "vital steps" in the historic preservation review process were skipped in violation of state law (HRS 6E), and issued a written order on August 5, 2014 with specific findings that HCDA violated historic preservation law.

In the absence of meaningful measures from the State agencies to protect these historic properties, it is necessary to revisit the Programmatic Agreement for measures to avoid, minimize and mitigate cumulative and indirect adverse effects that are being caused by the Project, such as in the transit oriented development areas.

We look forward to your timely response and prompt attention to this matter.

Very truly yours,



Kiersten Faulkner, AICP  
Executive Director

Copies via email:

FTA: Mary Nguyen

HART: Dan Grabauskas, Brennon Morioka, Liz Scanlon, Jon Nouchi, Stanley Solamillo

ACHP: Reid Nelson, Charlene Vaughan, Blythe Semmer

SHPD: Alan Downer, Jessica Puff, Susan Lebo

NAVY: John Lohr, Jeff Dodge, Charlene Oka-Wong

NTHP: Betsy Merritt

NPS: Elaine Jackson-Retondo, Paul DePrey, Melia Lane-Kamehele

OIBC: Hinaleimoana Wong-Kalu

AHCC: Mahealani Cypher

OHA: Jerry Norris

**From:** Kako'o  
**Sent:** Wednesday, November 19, 2014 9:14 AM  
**To:** 'Blythe Semmer'  
**Subject:** RE: Comments Sought -- Indirect and Cumulative Effects Caused by the Project

Thank you Blythe.

Paul

*Paul L. Cleghorn, Ph.D.*

**Kāko'o -- Honolulu Rail Transit Project  
Principal and Senior Archaeologist**

**Pacific Legacy, Inc.**  
**30 Aulike Street, Suite 301**  
**Kailua, HI 96734**  
**(o) 808-263-4800; (f) 808-263-4300**

---

**From:** Blythe Semmer [<mailto:bsemmer@achp.gov>]  
**Sent:** Wednesday, November 19, 2014 4:12 AM  
**To:** Kako'o  
**Subject:** RE: Comments Sought -- Indirect and Cumulative Effects Caused by the Project

Thanks, Paul. I don't anticipate that we will send comments.

Best regards,  
Blythe

*Blythe Semmer*  
Advisory Council on Historic Preservation  
202.517.0226

New ACHP **Guidance on Agreement Documents** now available at:  
[www.achp.gov/agreementdocguidance.html](http://www.achp.gov/agreementdocguidance.html)

---

**From:** Kako'o [<mailto:kakoo@pacificlegacy.com>]  
**Sent:** Tuesday, November 11, 2014 11:47 AM  
**To:** Blythe Semmer  
**Subject:** RE: Comments Sought -- Indirect and Cumulative Effects Caused by the Project

Hi Blythe,

Welcome back to work. Sorry that I did not respond sooner, but I have been having email issues. According to the PA I need to get recommendations to the FTA in 30 days after a notice has been filed – that would be the 28<sup>th</sup> of November. I had wanted to get my recommendations in the week prior, but I can't get off a bit. Sorry for any inconvenience I have caused you.

Paul

---

**From:** Blythe Semmer [<mailto:bsemmer@achp.gov>]  
**Sent:** Tuesday, November 04, 2014 11:56 AM  
**To:** Kako'o  
**Subject:** RE: Comments Sought -- Indirect and Cumulative Effects Caused by the Project

Hello, Paul:

Do you have a deadline for receiving comments on this matter? I am back in the office and catching up on the recent communication about the transit project.

Thanks,  
Blythe

*Blythe Semmer*  
Advisory Council on Historic Preservation  
202.517.0226

New ACHP *Guidance on Agreement Documents* now available at:  
[www.achp.gov/agreementdocguidance.html](http://www.achp.gov/agreementdocguidance.html)

---

**From:** Kako'o [<mailto:kakoo@pacificlegacy.com>]  
**Sent:** Wednesday, October 29, 2014 5:40 PM  
**To:** Paul Cleghorn  
**Cc:** Elizabeth Kahahane  
**Subject:** Comments Sought -- Indirect and Cumulative Effects Caused by the Project

Aloha Kākou,

This email is being sent to all consulting parties and all signatories of the Honolulu High Capacity Transit Corridor Project Programmatic Agreement (PA).

The attached letter from HHF was received yesterday regarding Stipulation IX: Measures to Address Reasonably Foreseeable Indirect and Cumulative Effects Caused by the Project, with specific reference to demolition of a portion of the Advertiser News Building and all of the Advertiser Press building.

As per Stipulation I.H.10, the Kāko`o is soliciting “. . . comments from consulting parties that identify impacts different from those stated in the PA to historic properties located within the APE. . .” These comments will be used in the preparation of recommendations . . . for the disposition of the request and action by FTA.”

I look forward to receiving comments.

Mahalo,

Paul

*Paul L. Cleghorn, Ph.D.*  
**Kāko`o -- Honolulu Rail Transit Project**

**Principal and Senior Archaeologist**

**Pacific Legacy, Inc.**

**30 Aulike Street, Suite 301**

**Kailua, HI 96734**

**(o) 808-263-4800; (f) 808-263-4300**

## Silva, Josh/HNL

---

**From:** Nouchi, Jon <jnouchi@honolulu.gov>  
**Sent:** Wednesday, December 03, 2014 9:52 AM  
**Subject:** Revised Kāko'o Scope of Work (SOW) for rebid of contract  
**Attachments:** Revised Kakoo Scope of Work DRAFT.pdf

Aloha Programmatic Agreement Signatory and Consulting Parties,

With your input, HART has assembled the following revised Scope of Work (SOW) as we proceed with procuring the services of a new Kāko'o Programmatic Agreement Project Manager.

Please review and provide comments on the attached SOW document by next Friday, December 12.

Me ka 'oia'ī'o,

**Jon Y. Nouchi | Deputy Director, Planning and Environmental | Honolulu Authority for Rapid Transportation (HART)**

**address** 1099 Alakea Street, Suite 1700 | **city** Honolulu | **state** Hawaii | **zip** 96813

**phone** 808.768.6275 | **mobile** 808.561.9550 | **email** [jnouchi@honolulu.gov](mailto:jnouchi@honolulu.gov)

**NOTICE:** This communication and any attachments ("this message") may contain confidential information for the sole use of the intended recipient(s). Any unauthorized use, disclosure, viewing, copying, alteration, dissemination, or distribution of, or reliance on this message is strictly prohibited. If you have received this message in error or you are not an authorized recipient, please notify the sender immediately by replying to this message, delete this message and all copies from your e-mail system, and destroy any printed copies.



**Pacific Basin – O‘ahu**  
 30 Aulike Street, Suite 301  
 Kailua, HI 96734

Phone: 808.263.4800  
 Fax: 808.263.4300  
 www.pacificlegacy.com

4 December 2014

Ted Matley  
 Federal Transit Authority  
 Region 9  
 201 Mission Street, Suite 1650  
 San Francisco, CA 94105-1839

Re: Honolulu High Capacity Transit Corridor Project Programmatic Agreement, Honolulu, Hawai‘i – Stipulation IX Measures to Address Reasonably Foreseeable Indirect and Cumulative Effects Caused by the Project

Dear Mr. Matley:

The Historic Hawai‘i Foundation (HHF), as a consulting party to the Programmatic Agreement (PA) for the Honolulu High Capacity Transit Corridor Project, has identified a significant adverse indirect or cumulative effect on a resource determined eligible for listing on the National Register of Historic Places that was not evaluated in the PA (HHF letters dated 10/28/2014 and 11/4/2014). In the HHF letters, a notice was made for the Federal Transit Authority (FTA) to convene a meeting among the FTA, Kāko‘o, HART, and the signatory and consulting parties, as per Stipulation IX.D of the PA. The purpose of this meeting is to “discuss what next steps would be appropriate under the new circumstances to mitigate the adverse effects on such resources” (Stipulation IX.D). Stipulation I.H.10 of the PA charges the Kāko‘o with soliciting comments from the consulting parties regarding impacts, and states that the Kāko‘o “shall research the issues presented . . . and prepare a recommendation for the disposition of the request and action by the FTA.” This letter is intended to fulfill this charge.

Comments from signatories and consulting parties were sought via email on 29 October 2014. This was followed on 30 October 2014 with letters requesting comments and information from HHF, the State Historic Preservation Division (SHPD), and the Honolulu Community Development Authority (HCDA). No comments were received from the consulting parties, but a wealth of documentation was provided by the agencies and especially the HHF. All materials received were carefully reviewed by the Kāko‘o for the purposes of making recommendations to the FTA.

Concern over indirect and cumulative effects has been strongly voiced by HHF since 2008, early in Section 106 consultation process. These concerns were shared by members of the American Institute of Architects, the National Trust for Historic Preservation, and the SHPD in 2009. Specifically, the concern stems from Transit Oriented Development (TOD) actions, which in the PA is defined as the area “within a 2,000 foot radius of each station” (Stip. IX.C).

**Pacific Basin -  
 Hawai‘i Island**  
 900 Kumukoa St.  
 Hilo, HI 96720  
 808.351.9560 Ph.  
 808.263.4300 Fax

**Business Office**  
 2641 Hwy 4  
 PO Box 6050  
 Arnold, CA 95223  
 209.795.4481 Ph.  
 209.795.1967 Fax

**Bay Area**  
 900 Modoc St.  
 Berkeley, CA 94707  
 510.524.3991 Ph.  
 510.524.4419 Fax

**Sierra/Central Valley**  
 4919 Windplay Dr., Ste. 4  
 El Dorado Hills, CA 95762  
 916.358.5156 Ph.  
 916.358.5161 Fax

**Inland Empire/ Mojave  
 Desert**  
 44702 10<sup>th</sup> St. West  
 Lancaster, CA 93534  
 661.729.9395 Ph.  
 661.729.9417 Fax

TOD has the potential to have significant economic benefits to sectors of the community. As Lee Sichter states in his DRAFT TOD Overlay Plan for the Kāka‘ako Community Development District “. . . significant private sector benefits typical of transit rich area [include]:

- Increased land values, and real estate performance (rents and increased rates)
- Increased sales . . .” (Sichter 2013:7-25)

Sichter also cites the HART Station Area Development Potential Report of 2011 that asserts that the Civic Center Station located in the Kāka‘ako area has “perhaps the greatest (redevelopment) potential of any station along the project alignment excluding the West O‘ahu stations” (Sichter 213:7-21). The economic ramifications of the the Honolulu High Capacity Transit Corridor Project cannot be debated and are generally acknowledged.

The issue that sparked HHF’s action was the demolition of the portions of the Honolulu Advertiser Building (aka the News Building) for the construction of two condominium towers and a parking garage. As the HHF letters indicate, this building complex was assessed as being significant based on numerous criteria and eligible for listing on the National Register of Historic Places. The developer for this project, Downtown Capital, LLC consulted with the HCDA and the SHPD, applied for and received the proper permits and has conducted demolitions of portions of the historic property. Downtown Capital, LLC did everything correctly, as did HCDA and SHPD. However, since the Honolulu Advertiser Building is located within the TOD, HART and FTA should have been involved. However, this action is now history. Going forward, FTA and HART must become much more proactive in identifying historic preservation issues and developing means of minimizing and mitigating potential indirect and cumulative effects of the Project. The following recommended actions are offered to assist FTA in meeting their obligations.

### **RECOMMENDED ACTIONS**

1. FTA must convene a series of meetings with interested signatories and consulting parties on how to address indirect and cumulative effects on historic properties as a result of the Project.
2. The FTA, in consultation with interested signatories and consulting parties, must identify potential historic properties that could be effected.
  - a. The entire project alignment should be separated into manageable sections for this analysis.
  - b. Potential historic properties should include cultural or neighborhood landscapes.
  - c. Recently another demolition of a potential historic property took place within the TOD - the Fishermans Warf Restaurant which should have been further evaluated prior to demolition. Some additional evaluation work may have transpired, but I am personally not aware of what actions were taken.
3. The FTA, in consultation with interested signatories and consulting parties, must determine methods to minimize and mitigate potential adverse indirect and cumulative effects.
  - a. The Historic Preservation Fund grants are intended to minimize and mitigate potential adverse indirect and cumulative effects. The grant process needs to be expedited and possibly expanded pending the outcome of the efforts suggested in items 1 and 2 above.

I trust that my comments and recommendations will assist FTA in meeting their historic preservation responsibilities. I am pleased that the first meeting with interested signatory and consulting parties will take place on 16 December 2014, and am hopeful that this meeting sets the stage for a positive and constructive dialogue among all interested parties.

Since HHF initiated these additional consultations, I am copying Kiersten Faulkner as a courtesy to assist in moving forward. I am also copying this letter to Jon Nouchi at HART.

Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,



Paul L. Cleghorn, Ph.D.  
Kāko'o

Copy:  
Jon Nouchi, HART  
Kiersten Faulkner, HHF

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

KIRK CALDWELL  
MAYOR



MICHAEL D. FORMBY  
DIRECTOR

MARK N. GARRITY, AICP  
DEPUTY DIRECTOR

TP11/14-587371R

December 8, 2014

Ms. Kiersten Faulkner, AICP  
Executive Director  
Historic Hawaii Foundation  
680 Iwilei Road, Suite 690  
Honolulu, Hawaii 96817

Dear Ms. Faulkner:

**SUBJECT: Honolulu High Capacity Transit Corridor Project Programmatic Agreement  
Honolulu, Hawaii; Stipulation IX Measures to Address Reasonably  
Foreseeable Indirect and Cumulative Effects Caused by the Project**

This responds to your letter of November 4, 2014, regarding the "Stipulation IX Measures to Address Reasonably Foreseeable Indirect and Cumulative Effects caused by the Project."

After extensive discussions with the City signatories of the subject Agreement, it was decided that the lead agency on this matter will be the Department of Planning and Permitting, Transit Oriented Development (TOD) section. Specifically, Ms. Kathy Sokugawa will be the lead contact for the City for all TOD matters relating to the Agreement.

Any future correspondence should be addressed to her to determine the extent of the City's involvement in any issue or matters regarding the TOD areas of the project.

Thank you for your understanding in the matter.

Very truly yours,

  
Michael D. Formby  
Director

cc: Department of Planning and Permitting  
Honolulu Authority for Rapid Transportation

## Nouchi, Jon

---

**From:** Nouchi, Jon

**Sent:** Tuesday, December 16, 2014 7:21 AM

**Subject:** Comments on Revised Kāko'o Scope of Work

Aloha Programmatic Agreement Signatory and Consulting Parties,

Thank you for providing comments regarding the new Scope of Work for the Kāko'o as set forth in the Programmatic Agreement.

HART will incorporate relevant oral and written comments gathered both in our consulting meeting and via email. We look forward to a timely procurement process to hire a new Kāko'o for the rail project. In the meantime, Paul Cleghorn with Pacific Legacy will continue to serve as the Kāko'o for the project.

We will keep the Signatory and Consulting Parties updated as we continue the process of procurement.

**Jon Y. Nouchi | Deputy Director, Planning and Environmental | Honolulu Authority for Rapid Transportation (HART)**

**address** 1099 Alakea Street, Suite 1700 | **city** Honolulu | **state** Hawaii | **zip** 96813

**phone** 808.768.6275 | **mobile** 808.561.9550 | **email** [jnouchi@honolulu.gov](mailto:jnouchi@honolulu.gov)

**NOTICE:** This communication and any attachments ("this message") may contain confidential information for the sole use of the intended recipient(s). Any unauthorized use, disclosure, viewing, copying, alteration, dissemination, or distribution of, or reliance on this message is strictly prohibited. If you have received this message in error or you are not an authorized recipient, please notify the sender immediately by replying to this message, delete this message and all copies from your e-mail system, and destroy any printed copies.

## Silva, Josh/HNL

---

**From:** Dawn Chang <dnschang@kuiwalu.com>  
**Sent:** Tuesday, February 17, 2015 7:01 AM  
**To:** Silva, Josh/HNL  
**Cc:** Luersen, Paul/HNL  
**Subject:** FW: Honolulu Transit PA Stip IX: HHF Recommendations  
**Attachments:** DTS Letter to HHF re Transit Cumulative Effects\_120814.pdf

Here it is. dawn

---

**From:** Kiersten Faulkner [mailto:Kiersten@historichawaii.org]  
**Sent:** Wednesday, December 17, 2014 9:09 AM  
**To:** Ted Matley (ted.matley@dot.gov); Paul Cleghorn (cleghorn@PACIFICLEGACY.COM)  
**Cc:** Jon Nouchi (jnouchi@honolulu.gov); Stanley Solamillo (ssolamillo@honolulu.gov); Dawn Chang; Charlene Vaughn; Blythe Semmer (bsemmer@achp.gov); Alan Downer (alan.s.downer@hawaii.gov); Susan Lebo (Susan.A.Lebo@hawaii.gov); Jessica Puff (jessica.l.puff@hawaii.gov); Betsy Merritt (emerritt@savingplaces.org); Kathy Sokugawa (ksokugawa@honolulu.gov); Harrison Rue (hrue@honolulu.gov); 'Deepak Neupane (deepak@HCDAAweb.org)'; Tanya Gumpac-McGuire; 'Elizabeth Scanlon (escanlon@honolulu.gov)'; 'John Lohr (john.r.lohr@navy.mil)'; 'Elaine Jackson-Retondo (Elaine\_Jackson-Retondo@nps.gov)'; 'Melia Lane-Kamahele (Melia\_Lane-Kamahele@nps.gov)'  
**Subject:** Honolulu Transit PA Stip IX: HHF Recommendations

Ted and Paul,

Thank you for holding a consulting party meeting on Dec. 16, 2014 in response to HHF's notice to FTA and the City & County of Honolulu about additional indirect and cumulative adverse effects to historic properties from the Honolulu Rapid Transit project. At the end of the meeting, Ted asked the parties to provide additional recommendations and suggestions for moving forward, per Stipulation IX.D.

In general, we feel there are two categories of treatment measures that should be considered:

1. Mitigation measures for the specific historic property (the News Building) that has already been adversely affected; and
2. Measures to avoid, minimize and mitigate any additional adverse effects, specifically from transit-oriented development.

As I mentioned in the meeting, HHF received a response from the City's Department of Transportation Services (attached for your information) that delegates their involvement to the Department of Planning and Permitting (DPP). In addition, some of the transit station areas are under the jurisdiction of the Hawai'i Community Development Authority (HCDA). We recommend that representatives of these agencies be involved in all the consultation meetings and participate in identifying and implementing appropriate preservation strategies.

Some contact information:

Ms. Kathy Sokugawa, Honolulu Department of Planning and Permitting: [ksokugawa@honolulu.gov](mailto:ksokugawa@honolulu.gov)

Mr. Harrison Rue, Honolulu TOD Administrator: [hrue@honolulu.gov](mailto:hrue@honolulu.gov)

Mr. Deepak Neupane, HCDA Director of Planning and Development: [deepak@HCDAAweb.org](mailto:deepak@HCDAAweb.org)

On the issue of overall indirect and cumulative effects, we recommend that FTA and/or the City:

1. Conduct an inventory of all properties within one-quarter mile of each station (e.g. the area that coincides with the City's TOD planning areas), and provide an analysis of the properties' historic significance, integrity and eligibility for the historic register;

2. Conduct a preliminary assessment of potential for adverse effect to the historic resources, to assist with prioritizing actions and developing treatments.
3. Include the findings in the City and State inventories of historic properties, add them to the relevant planning documents, and integrate planning goals and recommendations to preserve, protect and appropriately use the historic properties. For example, the City and HCDA plans need to be revised to include this information (see HHF's previous comments on these issues for examples).
4. For "high risk" properties, specific strategies and solutions need to be prioritized. For example, the Blaisdell Center is the subject of a City planning exercise that is contemplating demolition. The determination of eligibility should be conducted immediately and preservation of historic properties integrated into the development plan.
5. Stronger follow-through and accountability for the goals and objectives needs to be developed. How will the strategies be implemented and who will be held accountable for them? Some options could include establishing a City historic preservation review commission with appropriate rules and staffing support; and/or providing performance goals linked to federal funding or approvals (either from FTA for the project or from a preservation agency like NPS for a preservation program).
6. The transit project should also identify potential mitigation measures. Kāko'o mentioned the preservation grant program, which could be expanded.

On the issue of the mitigation for the News building:

1. The remaining portion of the historic building should be preserved. This was a stated goal of the developer and HCDA, but neither has made a reliable or solid preservation commitment. FTA/HART should ensure that the preservation actually occurs, either via the private development commitment and accountability, or by acquiring the parcel for preservation and adaptive use.
2. On-site improvements and interpretation could include information about the Waters of Ha'o (a culturally-significant feature on the site); the newspaper history; and the Kaka'ako history.
3. Additional mitigation should be developed with the input and discussion of the parties.

On the issue of PA Compliance, I remain concerned that this issue wasn't flagged in the "demolition reporting" required by Stip. IX.D. HART's semi-annual reports noted the demolition of the Press Building, but not its significance. The demolition of the News Building was not included at all. If the PA reports are not accurate, or are not useful, we should address that.

Please let me know if you have questions. I look forward to the follow-up meeting on January 22. Please advise of if the meeting will be before or after the regular monthly meeting at 10 a.m.

Thank you,  
Kiersten

Kiersten Faulkner, AICP  
Executive Director  
Historic Hawaii Foundation  
680 Iwilei Rd., Ste. 690  
Honolulu, HI 96817  
Tel: 808-523-2900  
FAX: 808-523-0800  
Email: [kiersten@historichawaii.org](mailto:kiersten@historichawaii.org)  
WEB: [www.historichawaii.org](http://www.historichawaii.org)

**Silva, Josh/HNL**

---

**From:** Kako'o <kakoo@pacificlegacy.com>  
**Sent:** Friday, December 19, 2014 5:52 AM  
**To:** Nouchi, Jon  
**Cc:** Elizabeth Kahahane  
**Subject:** FW: Final Treatment Plan for Cultural and Historic Resources at Aloha Stadium  
**Attachments:** image001.png

Aloha,

The Final Treatment Plan for Cultural and Historic Resources at Aloha Stadium Station has been posted to the HART project website: <http://www.honolulutransit.org/planning/iv-design-standards.aspx> ...under the **APPLICABILITY OF SOI STANDARDS/TREATMENT PLANS** tab.

Here is a direct link to the document: [http://honolulutransit.org/media/305716/Treatment-Plan\\_Aloha-Stadium\\_Final\\_2014-November\\_Rev1.pdf#.V19cMofRc8Y.email](http://honolulutransit.org/media/305716/Treatment-Plan_Aloha-Stadium_Final_2014-November_Rev1.pdf#.V19cMofRc8Y.email)

Paul

*Paul L. Cleghorn, Ph.D.*  
Kāko'o -- Honolulu Rail Transit Project  
Principal and Senior Archaeologist

**Pacific Legacy, Inc.**  
**30 Aulike Street, Suite 301**  
**Kailua, HI 96734**  
**(o) 808-263-4800; (f) 808-263-4300**

Date: 12/19/14

CSH Job Code: KAKAAKO 147

Submittal Sheet for Historic Preservation Review Filing Fees

State Historic Preservation Division

Department of Land and Natural Resources

Agency/Firm (Requesting Review): Cultural Surveys Hawai'i Inc.

Contact: Matt McDermott

Phone: 808 262-9972 Fax: 808 262-4950

Address: P.O. Box 1114 Kailua, HI 96734

Email: mmcdermott@culturalsurveys.com

Title of Report/Plan:

Draft Supplemental Archaeological Inventory Survey Report for the City Center (Section 4) of the Honolulu Rapid Transit Project, Kalihi, Kapālama, Honolulu, and Waikiki Ahupua'a, Honolulu (Kona) District, O'ahu Addressing Changes from the Vicinity of Ward Avenue and Halekauwila Street to the Vicinity of Queen and Kamāke'e Streets TMK: [1] 2-3 (Various Plats and Parcels) (Humphrey et al 2014)		
Island	O'ahu	District Honolulu (Kona) Ahupua'a Kalihi, Kapālama, Honolulu, Waikiki
TMK TMK: [1] 2-3 (Various Plats and Parcels)		
Acreage Inventoried		Number of new sites inventoried
Approx. 1.6 acres		0

Submittal Plan/Report Fee & Type: (All reports or plans submitted to the SHPD for review shall be accompanied by the appropriate fee in accordance with HAR§13-275-4 and §284-4).

- Check if Report is a Re-Submittal (no fee charged)
- Final Report with CD
- \$25 Literature Review & Field Check
- \$50 Archaeological Assessment
- \$150 Archaeological Inventory Survey Plan
- \$450 Archaeological, Architectural or Ethnographic Survey Report
- \$150 Preservation Plan
- \$25 Monitoring Plan
- \$150 Archaeological Data Recovery Plan
- \$250 Burial Treatment Plan
- \$100 Archaeological Monitoring Report, if resources reported
- \$0 Archaeological Monitoring Report, no finds
- \$450 Archaeological Data Recovery Report
- \$450 Ethnographic Documentation Report
- \$25 Burial Disinterment Report
- \$50 Osteological Analysis Report

2014 DEC 22 P 2:21

Fee Total: \$450.00 (make checks payable to "Hawaii Historic Preservation Special Fund")  
For Office Use Only:

Date Received	Payment Method
	Cash \$
	Check Check No:
Log No.	Receipt Issued: