NEIL ABERCROMBIE
GOVERNOR OF HAWAII

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

ESTHER KIA'AINA
FIRST DEPUTY

WILLIAM M. TAM
DEPUTY DIRECTOR - WATER

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

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

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

August 27, 2013

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

LOG NO: 2013.4528
DOC NO: 1308SL24
Archaeology

Dear Mr. McDermott:

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

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

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

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

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

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

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

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

Aloha,

William J. Aila, Jr.
State Historic Preservation Officer