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DEPARTMENT OF LAND AND NATURAL RESOURCES

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KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

February 21, 2014

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

LOG NO: 2014.00643
DOC NO: 1402SL17
Archaeology

Dear Mr. McDermott:

**SUBJECT: Chapter 6E-8 and National Historic Preservation Act (NHPA) Section 106 Review–
Archaeological Monitoring Plan for the Airport Section (Section 3) of the Honolulu
High-Capacity Transit Corridor Project
Hālawa and Moanalua Ahupua'a, 'Ewa and Honolulu District, O'ahu Island
TMK: (1) 1-1 and 9-9 various**

Thank you for the opportunity to review this draft report titled *Archaeological Monitoring Plan for the Airport Section (Section 3) of the Honolulu High-Capacity Transit Corridor Project, Hālawa and Moanalua Ahupua'a, Ewa and Honolulu Districts, O'ahu TMK Sections [1] 1-1 and 9-9 (Various Plats and Parcels)* (Hammatt, February 2014). We received this submittal on February 12, 2014. An archaeological inventory survey (AIS) plan (Hammatt and Shideler 2011) was reviewed and accepted by SHPD on December 2, 2011 (Log No. 2011.2167, Doc. No. 1211NN01). An Addendum AISP (Hammatt and Shideler 2013) was reviewed and accepted by SHPD on March 1, 2013 (Log No. 2013.1957, Doc. No. 1302SL29). The AIS report (Hammatt et al. 2013) was reviewed and accepted by SHPD on August 26, 2013 (Log No. 2013.2279, 2013.4326, Doc. No. 1308SL20).

The Airport Section 3 project area consists of approximately 4.8 miles of the 20-mile transit corridor. The project area correlates with the area of direct ground disturbance, which totals 9.06 acres. The Honolulu High-Capacity Transit Corridor Project is a federal undertaking subject to Section 106 of the National Historic Preservation Act due to federal (FTA) funding and to use of federal lands (US Navy). The FTA determined that the undertaking will have an adverse effect on historic properties eligible for listing or are currently listed on the National Register of Historic Places. The Hawaii State Historic Preservation Officer concurred. To mitigate the potential adverse effects, a programmatic agreement (PA) was executed on January 18, 2011.

The archaeological monitoring plan (AMP) was prepared for the City and County of Honolulu and the Federal Transit Administration on behalf of PB Americas, Inc. The AMP addresses documentation of the two previously-identified historic properties recorded during the AIS – buried remnant sections of a buried asphalt roadway (SIHP 50-80-13-7420) and buried remnants of military infrastructure including concrete slabs, a coral pavement, and base course deposits (SIHP 50-80-13-7421). It also addresses appropriate documentation of any as yet to be identified historic properties within Section 3; the monitoring report also will include documentation of any inadvertent finds encountered in Section 1.

The archaeological monitoring plan provides a good discussion of the project, environs, traditional and historical background, previous archaeological investigations and findings, and the archaeological monitoring provisions.

Please address the two following concerns:

- (1) Clarify whether the project area includes federal lands (US Navy), including Pearl Harbor Naval Base Station and the applicability of NAGPRA.

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- (2) Insert proper citation references for the AISP, Addendum AISP, and AIS report in Sections 1.5 and 1.6 pertaining to the Traditional Historical Background and Previous Archeological Research sections.

This plan meets the requirements specified in the *Secretary of the Interior's Standards for Archeological Documentation* and the requirements set forth in Hawaii Administrative Rules (HAR) §13-279-4. It is **accepted with the understanding that the minor revisions mentioned above are made**. 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 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.

Susan A. Lebo, PhD
Oahu Lead Archaeologist