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June 23, 2014

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

LOG NO: 2014.02203
DOC NO: 1406SL23
Archaeology

Dear Mr. McDermott:

**SUBJECT: Chapter 6E-8 and National Historic Preservation Act (NHPA) Section 106 Review–
Archaeological Monitoring Plan for City Center (Section 4)
of the Honolulu Rapid Transit Project
Kalihi, Kapālama, Honolulu, and Waikīkī Ahupua‘a, Honolulu (Kona) District, O‘ahu
TMK: (1) 1-2, 1-5, 1-7, 2-1, 2-3 various**

Thank you for the opportunity to review this draft report titled *Archaeological Monitoring Plan for the City Center (Section 4) of the Honolulu Rapid Transit Project, Kalihi, Kapālama, Honolulu, and Waikīkī Districts, O‘ahu TMK Sections [1] 1-2, 1-5, 1-7, 2-1, 2-3 (Various Plats and Parcels)* (Hammatt, May 2014). We received this submittal on May 13, 2014. The archaeological inventory survey plan (AISP) for the City Center (Hammatt et al. 2011) was reviewed and accepted by SHPD on October 25, 2011 (Log No. 2011.2379, Doc. No. 1110NN08). Subsequently, the Kaka‘ako Station footprint was relocated and an Addendum AISP (Hammatt et al. 2013) was reviewed and accepted by SHPD on March 1, 2013 (Log No. 2013.1958, Doc. No. 1302SL28). The City Center (Section 4) AIS (Hammatt 2013) was reviewed and accepted by SHPD on August 26, 2013 (Log. No. 2013.2564, 2013.4338, Doc. No. 1308SL21). An Interim Protection Plan for the Honolulu Rapid Transit Project including the City Center (Section 4) was reviewed and accepted by SHPD on August 29, 2013 (Log No. 2013.5066A, Doc. No. 1308PA01). A supplemental AIS for City Center to address additional changes to the Kaka‘ako Station and vicinity (Humphrey and McDermott, June 2014) was reviewed and accepted by SHPD on June 20, 2014 (Log No. 2014.02615, Doc. No. 1406SL22).

The City Center (Section 4) project area consists of approximately 4.3 miles of the 20-mile transit corridor. The project area correlates with the area of direct ground disturbance, which totals 13 acres. The Honolulu Rapid Transit 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. It provides adequate discussion of the project, environs, traditional and historical background, previous archaeological investigations and findings, and the archaeological monitoring provisions. The plan also addresses proposed additional documentation of the 19 historic properties recorded within the Section 4 project area, of one historic property adjacent to the project area which might be impacted during construction (see Table 1), and of any as yet to be identified historic properties.

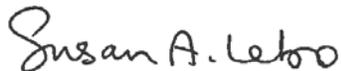
This plan meets the requirements specified in the *Secretary of the Interior's Standards for Archeological Documentation* and in Hawaii Administrative Rules (HAR) §13-279-4. It is accepted. Please send one hardcopy of

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February 21, 2014
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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,



Susan A. Lebo, PhD
Oahu Lead Archaeologist

Table 1. Archaeological Historic Properties Identified During AIS in City Center Section 4

Site (50-80-14)	Description	HAR Significance	NR Eligibility
2918	Subsurface cultural layer and human burials	Criteria d, e	Criterion D
2936	Subsurface cultural deposit, pond sediments, human and animal burials	Criteria d, e	Criterion D
5368	Subsurface Kūwili Fishpond sediments	Criterion d	Criterion D
5820	Subsurface cultural deposit and human burials	Criteria d, e	Criterion D
5966	Subsurface Kawa Fishpond sediments	Criterion d	Criterion D
6636	Subsurface Kewalo wetland deposit	Criteria a, d	Criterion D
6856	Subsurface Kolowalu Fishpond sediments	Criterion d	Criterion D
7124	Subsurface infrastructure remnants	Criteria a, d	Criterion D
7189	Subsurface burnt trash deposit	Criteria a, d	Criterion D
7190	Subsurface salt pan remnants	Criteria a, d	Criterion D
7193	Subsurface trash deposit	Criterion d	Criterion D
7197*	Subsurface cultural deposit and fire pit feature	Criteria a, d	Criterion D
7425	Subsurface fire feature remnant	Criterion d	Criterion D
7426	Subsurface wetland deposit	Criterion d	Criterion D
7427	Subsurface infrastructure remnants, subsurface cultural deposits, human skeletal element	Criteria d, e	Criterion D
7428	Subsurface cultural deposit and historic building foundation	Criterion d	Criterion D
7429	Subsurface cultural deposit and human skeletal element	Criteria d, e	Criterion D
7430	Subsurface privy remnant	Criterion d	Criterion D
7506	Subsurface incinerated trash deposit	Criterion d	Criterion D

*7197 is located in immediate proximity to project APE and may potentially be affected by project construction.