



U.S. Department
of Transportation
**Federal Transit
Administration**

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CMS01828

HART

REGION IX
Arizona, California,
Hawaii, Nevada, Guam
American Samoa,
Northern Mariana Islands

201 Mission Street
Suite 1650
San Francisco, CA 94105-1839
415-744-3133
415-744-2726 (fax)

Alan Downer, PhD
Administrator
State Historic Preservation Division
Kakuhihewa Building
601 Kamokila Blvd., Suite 555
Kapolei, HI 96707
Attention: Jessica Puff, Architectural Historian

15 JUL -6 P2:12

JUN 30 2015

Re: Potential Traditional Cultural Properties near the
Honolulu Rail Transit Project; City and County of
Honolulu, Hawaii

Dear Mr. Downer:

The purpose of this letter is to provide the State Historic Preservation Division (SHPD) information regarding the efforts by Honolulu Authority for Rapid Transportation (HART), in cooperation with Federal Transit Administration (FTA) to identify potential historic properties within the area of potential effect (APE) of the Honolulu Rail Transit Project (Undertaking) in the Honouliuli area of West O'ahu. This letter requests your concurrence that these efforts fulfill the requirements of Section 106 of the National Historic Preservation Act (NHPA) to identify historic properties, as detailed in 36 CFR 800.4, and that there are no additional historic properties affected by the Undertaking, consistent with 36 CFR 800.4(d)(1).

In their letter dated January 8, 2015 and email dated January 9, 2015, Kanehili Cultural Hui (KCH), a consulting party, notified the FTA and HART per Programmatic Agreement (PA) Stipulation IX.D and Stipulation I.H.10 of potential effects by the Honolulu Rail Transit Project on four potential Traditional Cultural Properties (TCP) in the Honouliuli area of West O'ahu:

- Complex of Shark God Caves and Channels, which include underground wahi pana natural caves, karst caverns and tunnels
- Leina a ka Uhane
- Traditional Trail System, namely the 1835 Malden Trails
- Resources on the 'Ewa Plain, including the 'Ewa Plantation lands, 'Ewa Sugar Plantation Villages Historic District, the 'Ewa Mooring Mast Field Historic District, and the 'Ewa Battlefield.

The comments from the consulting parties and Kako'o's recommendation are included in the enclosed Kako'o's letters, dated January 8, 2015 and March 25, 2015.

After considering the comments from the consulting parties and recommendations from the Kako'o, FTA and HART made a reasonable and good faith effort to identify the relationship of these potential historic properties to the APE consistent with 36 CFR 800.4(b). The effort took into account past planning, research and studies including, but not limited to, the Honolulu High-Capacity Transit Corridor Project Final Environmental Impact Statement/Section 4(f) Evaluation (June 2010), Determination of Eligibility and Finding of Effect for Previously Unidentified Traditional Cultural

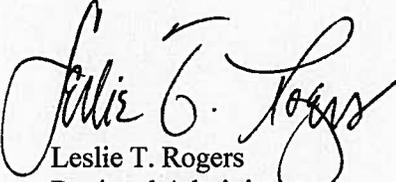
Properties (May 2012), and Archaeological Inventory Surveys conducted between 2010 through 2013. In addition, the historic locations of the resources were placed into a Geographical Information System and overlaid with current aerial photos and street maps to determine proximity of the resources to the APE. Field investigations were also conducted in April 2015. The research, photos, and maps from the field investigations and the analysis of the potential historic properties are included in the attached technical memoranda.

Based on this information, FTA found that the potential historic properties listed above are located outside of the APE for the Undertaking and would not be affected by the Undertaking. On May 14, 2015, the FTA issued a response to KCH (see enclosed) and notified all consulting parties, including Native Hawaiian organizations, and the signatories to the PA.

In accordance with 36 CFR § 800.4(d)(1), the FTA requests your concurrence with the documentation of the reasonable and good faith efforts to identify historic properties and the finding that no additional historic properties are affected.

If you have any questions, please contact Mr. Ted Matley, Community Planner at (213) 202- 2599 or Ms. Mary Nguyen, Environmental Protection Specialist in our Los Angeles Metropolitan Office at (213) 202-3960.

Sincerely,



Leslie T. Rogers
Regional Administrator

Enclosures:

- Kako'o Letters (January 8, 2015 and March 25, 2015)
- Karst Notes Memo (May 2015)
- Leina Notes Memo (May 2015)
- Historic Property Analysis of the Ewa Plain Resources Technical Memorandum (May 2015)
- Historic Property Analysis of the Malden Trails Technical Memorandum (May 2015)
- FTA Letter to Kanehili Cultural Hui (May 14, 2015)

cc: Jon Nouchi, HART