From: Bausch, Carl (FTA)
To: Zelasko, Elizabeth (FTA)
Sent: 4/27/2010 7:46:51 AM
Subject: RE: Archaeological Sites First Phase

And there is nothing in law or policy, insofar as I am aware, that prevents us from imposing conditions on our approval to undertake preliminary engineering (or any other activities, for that matter).

From: Zelasko, Elizabeth (FTA)
Sent: Tuesday, April 27, 2010 1:41 PM
To: Matley, Ted (FTA); Sukys, Raymond (FTA); Marler, Renee (FTA); Bausch, Carl (FTA)
Subject: Archaeological Sites First Phase

In my opinion I think that perception is a good enough reason for not moving forward with the test pits, here is some additional information from the archeological resources. Attached is the latest version of the PA that has a stipulation on archeological investigations. Even after the PA is signed, there are steps outlined in the process to consider such as:

The City shall develop an Archaeological Inventory Survey (AIS) Plan for the APE for each construction phase and shall submit it to the SHPD. The SHPD will provide comments to the City to be taken into account in revising the AIS plan or accept the AIS Plan within 30 days. The AIS Plan shall follow the requirements of Hawai'i Administrative Rules (HAR), Title 13, Subtitle 13, Chapter 276.

It appears that the city has already prepared a draft archeological inventory survey, but it is unclear whether the SHPD has provided comments on it. Information indicates that the AIS investigation for the first construction phase identified one subsurface cultural deposit. A question I have would be how much archeological investigations they have completed in the area and do more need to be completed per the terms in the PA?

In the materials that we have received from the City, portions of the first phase of construction would have moderate potential for burials, pre-contact resources, and post-contact resources.

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