

**Determination of Eligibility and Finding of Effect
for Previously Unidentified Traditional Cultural
Properties in Sections 1-3**

Honolulu Rail Transit Project

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Prepared for:
Honolulu Authority for Rapid Transportation



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This study was undertaken pursuant to Stipulation II of the Honolulu Rail Transit Project (H RTP) Programmatic Agreement (PA). The study builds on the Section 106 process which included identifying properties of religious and cultural significance to Native Hawaiian organizations (ACHP 2011: 14), often called Traditional Cultural Properties (TCPs) and culminated with a Programmatic Agreement executed in January 2011. TCPs are identified by the cultural significance derived from the role the property plays in a community's historically rooted beliefs, customs, and practices. A TCP is defined as a property eligible for inclusion in the National Register of Historic Places (NRHP) because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community.

To identify possible TCPs, a wide variety of sources were consulted including existing literature, archival documents, historic maps, and oral tradition. The results of this effort are documented in a technical report (Kumo Pono 2012) and a management summary (SRI Foundation and Kumu Pono 2012). The study identified 50 named places (13 ahupuaa, 26 wahi pana, 1 Leina a ka 'uhane and 10 inoa 'āina).

Of the 50 named places identified, the 13 ahupua'a were not studied further since they are the larger traditional land divisions for the island of O'ahu that provide the context for consideration of individual wahi pana. The ahupua'a identified included:

- Honouliuli
- Hō'ae'ae
- Waikele
- Waipi'o
- Waiawa
- Mānana
- Waimano
- Waiau
- Waimalu
- Kalauao
- Aiea
- Hālawa
- Moanalua

Figure 1 identifies the remaining 37 named places or 43 individual wahi pana sites (26 wahi pana, 10 inoa 'āina and the 7 individual wahi pana that make up the single Leina a ka 'uhane named place). The APE is noted as the lightly highlighted area along the corridor. There are an additional 15 sites (nine wahi pana, the Leina a ka 'uhane, and five inoa 'āina) that are located outside the H RTP area of potential effect (APE). Upon review there did not appear to be any project affect to these sites and no further information was heard during consultation so they were removed from further consideration. The sites outside the APE are highlighted by an asterisks.

Of the remaining 22 named places (Table 1) within the APE, 20 were found not eligible to the NRHP (5 inoa 'āina and 15 wahi pana). The 5 inoa 'āina lacked any

story connecting the locations with historic people or events and established no link between story and place. The 15 wahi pana found not eligible do not retain sufficient integrity to provide the integral link between the tradition and the place, as discussed in National Register Bulletin (NRB) 15. All of these properties are described and considered in detail in the attached documentation.

Two resources (wahi pana) have been identified as NRHP eligible historic properties of religious and cultural significance to Native Hawaiian organizations. These properties described below meet National Register criteria and have sufficient integrity to convey the integral link between tradition and place. A finding of No Adverse Effect was made for the two properties. No mitigation is required. HART and FTA are committed to exploring appropriate ways to share and tell these stories. The information gained from all the research associated with the Traditional Cultural Properties described in this report will be used in conjunction with the implementation of PA Stipulation VII. Educational and Interpretive Programs, Materials, and Signage.

Table 1. Summary of National Register Eligibility for all wahi pana and inoa 'āina in the APE

Site # ¹	Location	NRHP Criteria				Integrity							NRHP Eligible?
		A	B	C	D	Workmanship	Design	Materials	Location	Association	Feeling	Setting	
Wahi pana													
8	Hā'ena Heiau (Ahu'ena)	✓	✓						✓				No
9	Hālaulani		✓			NA	NA	NA					No
11	Piliamo'o		✓			NA	NA	NA	✓				No
12	Kuka'eki		✓			NA	NA	NA	✓				No
13	Kahō'ai'ai	✓	✓			NA	NA	NA	✓				No
14	Piliaumoa					NA	NA	NA					No
15	Hā'upu (Haupu'u)	✓	✓						✓				No
17	Kanukamanu		✓			NA	NA	NA	✓				No
18	Nāpōhakuluahine	✓	✓			NA	NA	NA	✓				No
19	Ka'oinaomaka'ioulu	✓	✓			NA	NA	NA					No
22	Kaihuokapua'a					NA	NA	NA	✓				No
23	Kawaili'ulā (waili'ulā)	✓				NA	NA	NA	✓				No
25	Kalua'ōlohe		✓			NA	NA	NA	✓				No
28	Huewaiipi	✓				NA	NA	NA	✓	✓			Yes
29	Kauhihau		✓			NA	NA	NA	✓				No
31	Kūki'iahu (Kūki'i)	✓	✓			NA	NA	NA	✓				Yes ²
42	'Au'au		✓			NA	NA	NA	✓				No
Inoa 'āina													
7	Kanupo'o					NA	NA	NA	✓	NA	NA	NA	No
10	Kalipāhe'e					NA	NA	NA	✓	NA	NA	NA	No
24	Kahāpapa					NA	NA	NA	✓	NA	NA	NA	No
33	Kā'eo					NA	NA	NA	✓	NA	NA	NA	No
35	Kapu'ukapu					NA	NA	NA	✓	NA	NA	NA	No

Notes: Properties in bold have been evaluated as eligible for the National Register of Historic Places. Key: ✓ = yes, NA = not applicable

¹Site numbers correspond to the maps in this report and the Management Summary.

²Eligible as previously identified Sumida Watercress Farm.



Figure 1. Overview of the TCP Study Area

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The Honolulu Rail Transit Project (H RTP) has considered its effects to historic properties through a thorough Section 106 process that culminated in a Programmatic Agreement (PA) that provides mitigation and continued guidance through project completion. As a part of the process the H RTP has considered impacts to Traditional Cultural Properties (TCPs) and identified numerous historic properties that meet definitions of TCPs (Parker and King 1998).

While the current documentation focuses on Native Hawaiian sacred and storied sites, prior studies that fulfilled the requirements of Section 106 for the FEIS included a variety of populations and cultural resource types. The previous studies included resources that met the definition of Traditional Cultural Properties and are available on the H RTP website. These studies were performed for and incorporated in the FEIS process for purposes of identifying and evaluating the impact of the H RTP on historic properties (structures, archaeological resources and cultural/traditional cultural properties, inclusive of cultural landscapes).

These prior studies included identification of NRHP eligible Traditional Cultural Property resources such as: Sumida Watercress Farm (associated with the history of wetland agriculture), Aiea Plantation Cemetery (associated with the plantation settlement pattern), the 1958 Kamaka Ukulele (associated with prominent ukulele manufacturer), the Tong Fat building (associated with the development of the 'A'ala neighborhood), and the 1963 Waipahu Stake of the Church of Jesus Christ of Latter Day Saints (associated with the Samoan community). Table 4-34 of the FEIS identifies these properties as No Adverse Effect. All of these properties derive their NRHP eligibility in part or in whole from their role in traditional resource extraction, or associations with a community's historically rooted beliefs, customs, and practices. In addition, a number of properties, such as Irwin and Mother Waldron Parks, derive their significance from the role they played in the development of Honolulu's waterfront landscape, also consistent with definitions of TCPs. The relevant technical reports are: *Historic Resources Technical Report, Honolulu High-Capacity Transit Corridor, August 15, 2008*, *Cultural Resources Technical Report, Honolulu High-Capacity Transit Corridor, August 15, 2008*, *Addendum 01 to the Historic Resources Technical Report, Honolulu High-Capacity Transit Corridor, June 7, 2010* and *Addendum 01 to the Cultural Resources Technical Report, Honolulu High-Capacity Transit Corridor, May 22, 2009*.

The archaeological survey completed before the PA considers dozens of lo'i, loko, kula, heiau and other site types all meeting the definitions of TCPs. These were previously addressed in archaeological studies such as the *Draft Historic and Archaeological Technical Report, Honolulu High-Capacity Transit Corridor, Sept 1, 2006* and the *Archaeological Resources Technical Report, Honolulu High-Capacity Transit Corridor, August 15, 2008*.

Nonetheless, the PA for the H RTP specifies a requirement for supplemental consultation and study of previously unidentified TCPs. This report summarizes consulting party consultation to date, determination of eligibility and finding of effect (DOEFOE) resulting from the H RTP's additional study of Traditional Cultural Properties. Pursuant to Stipulation II.A of the Final Programmatic Agreement, HART has undertaken additional study of Traditional Cultural Properties that may be affected by the H RTP. The results of the study are presented in two volumes, which are incorporated here by reference. Both documents were provided to consulting parties and SHPD on April 20, 2012.

- *The Study titled: Study to Identify the Presence of Previously Unidentified Traditional Cultural Properties in Sections 1 – 3 of the Honolulu Rail Transit Project, Management Summary (The Study)* is an overview of the TCP study methodology and findings authored by The SRI Foundation (SRIF) and Kumo Pono, LLC (2012).
- The Study was based on a larger research technical report titled: *HE MO'OLELO 'ĀINA–TRADITIONS AND STORIED PLACES IN THE DISTRICT OF 'EWA AND MOANALUA (IN THE DISTRICT OF KONA), ISLAND OF O'AHU A TRADITIONAL CULTURAL PROPERTIES STUDY – TECHNICAL REPORT* authored by Kumu Pono Associates LLC (2012).

Guidance for TCPs is provided in a few sources, including National Register Bulletin 38 (Parker and King 1998). It provides a number of nuances associated with TCPs. TCPs are sites associated with “cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community (Parker and King 1999:1). As described in the cited reports, the identified wahi pana (sacred and storied places) generally meet this definition and warrant consideration as potentially NRHP eligible TCPs.

Another issue with the term TCP is that Bulletin 38 has sometimes been interpreted as requiring a Native Hawaiian organization to demonstrate continual use of a site in order for it to be considered a TCP in accordance with Bulletin 38. It is important to note that under the NHPA and the Section 106 regulations, the determination of a historic property's religious and cultural significance to a Native Hawaiian organization is not tied to continual or physical use of the property. Also, continual use is not a requirement for National Register eligibility (ACHP 2011:14)

Evaluating sites for NRHP eligibility is a two part process. A site is evaluated against four specific eligibility criteria, and is then assessed for integrity. Sites that meet one or more NRHP eligibility criteria, but do not retain integrity are not eligible for the NRHP.

2.1 National Register Criteria

To evaluate eligibility, the Advisory Council on Historic Preservation (ACHP) has promulgated NRHP eligibility criteria at 36 CFR 60.4. NRHP eligibility applies to districts, sites, buildings, structures, and objects:

- a) that are associated with events that have made a significant contribution to the broad patterns of our history; or
- b) that are associated with the lives of persons significant in our past; or
- c) that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- d) that have yielded, or may be likely to yield, information important in prehistory or history.

Criterion C is typically applied to the built environment and would not apply to natural landforms or non-architectural resources. Criterion D typically applies to potential for data recovery beyond what can be documented during recordation. Thus, wahi pana identified in this effort do not meet criteria C and D, although all four criteria are addressed in the eligibility determination below (Section 6).

2.2 Integrity

Establishing NRHP eligibility also depends on integrity of location, design, setting, materials, workmanship, feeling, and association. Sites that meet one or more NRHP eligibility criteria, but do not retain integrity are not eligible for the NRHP. Assessing integrity can be very difficult. National Register Bulletin 38 provides the following guidance (Parker and King 1998:11):

- “In the case of a Traditional Cultural Property, there are two fundamental questions to ask about integrity. First, does the property have an integral relationship to traditional cultural practices or beliefs; and second, is the condition of the property such that the relevant relationships survive?”
- “If the property is known or likely to be regarded by a traditional cultural group as important in the retention or transmittal of a belief, or to the performance of a practice, the property can be taken to have an integral relationship with the belief or practice, and vice-versa.”

The key is to assess whether or not the site retains that integral relationship with the belief or practice. Guidance for assessing integrity is provided in National Register Bulletin 15 (NRHP 2002), which defines the seven aspects of integrity. These seven aspects are location, design, setting, materials, workmanship, feeling and association. Most, but not all of the sites discussed here are non-architectural properties, or natural landforms. For that reason, integrity of design, workmanship

and materials generally do not apply. Each is considered where appropriate in the eligibility determination below. Guidance from National Register Bulletin 15 (NRHP 2002) is provided below:

- “Location - Location is the place where the historic property was constructed or the place where the historic event occurred. The relationship between the property and its location is often important to understanding why the property was created or why something happened. The actual location of a historic property, complemented by its setting, is particularly important in recapturing the sense of historic events and persons. Except in rare cases, the relationship between a property and its historic associations is destroyed if the property is moved. (See Criteria Consideration B in Part VII: How to Apply the Criteria Considerations, for the conditions under which a moved property can be eligible.)
- Design - Design is the combination of elements that create the form, plan, space, structure, and style of a property. It results from conscious decisions made during the original conception and planning of a property (or its significant alteration) and applies to activities as diverse as community planning, engineering, architecture, and landscape architecture. Design includes such elements as organization of space, proportion, scale, technology, ornamentation, and materials.
- Setting - Setting is the physical environment of a historic property. Whereas location refers to the specific place where a property was built or an event occurred, setting refers to the character of the place in which the property played its historical role. It involves how, not just where, the property is situated and its relationship to surrounding features and open space.

Setting often reflects the basic physical conditions under which a property was built and the functions it was intended to serve. In addition, the way in which a property is positioned in its environment can reflect the designer's concept of nature and aesthetic preferences.

The physical features that constitute the setting of a historic property can be either natural or manmade, including such elements as:

- Topographic features (a gorge or the crest of a hill);
- Vegetation;
- Simple manmade features (paths or fences); and
- Relationships between buildings and other features or open space.

These features and their relationships should be examined not only within the exact boundaries of the property, but also between the property and its surroundings. This is particularly important for districts.

- Materials - Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. The choice and combination of materials reveal the preferences of those who created the property and indicate the availability of

particular types of materials and technologies. Indigenous materials are often the focus of regional building traditions and thereby help define an area's sense of time and place.

- **Workmanship** - Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. It is the evidence of artisans' labor and skill in constructing or altering a building, structure, object, or site. Workmanship can apply to the property as a whole or to its individual components. It can be expressed in vernacular methods of construction and plain finishes or in highly sophisticated configurations and ornamental detailing. It can be based on common traditions or innovative period techniques.
- **Feeling** - Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features that, taken together, convey the property's historic character. For example, a rural historic district retaining original design, materials, workmanship, and setting will relate the feeling of agricultural life in the 19th century. A grouping of prehistoric petroglyphs, unmarred by graffiti and intrusions and located on its original isolated bluff, can evoke a sense of tribal spiritual life.
- **Association** - Association is the direct link between an important historic event or person and a historic property. A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer. Like feeling, association requires the presence of physical features that convey a property's historic character. For example, a Revolutionary War battlefield whose natural and manmade elements have remained intact since the 18th century will retain its quality of association with the battle.

Because feeling and association depend on individual perceptions, their retention alone is never sufficient to support eligibility of a property for the National Register.

The study area for this effort is Sections 1, 2 and 3 of the HRTP. It does not include Section 4. The Programmatic Agreement officially specifies the APE for this effort as the APE depicted in Attachment 1 to the PA. This APE has been added to the figures that accompany this report. The APE was established to capture the area or areas within which the HRTP may directly or indirectly cause alterations in the character or use of historic properties (36 CFR 800.16).

The TCP study identified many wahi pana and inoa 'āina outside of this APE. All of these wahi pana and inoa 'āina are illustrated on the maps within this report, but only the 22 that are in, or partially in the APE are assessed for eligibility and effect.

Figure 1 presents the HRTP and the TCP Study Area. Wahi pana and inoa 'āina are presented as individual points in Figure 1, but subsequent figures present the area of each bounded wahi pana and inoa 'āina in closer scale. Maps also provide the outline of the HRTP's construction footprint for reference.

The study focused on following up on the information gathered from the two consultation meetings, research of Native Hawaiian and English texts, interviews with identified Native Hawaiian practitioners and extensive research into the history of place along the corridor. The following summarizes the key methods used to conduct research of the study area.

The study included five basic tasks:

1. Research in primary Hawaiian and English language records covering traditions, history of residency and land use, surveys, and descriptions of historic development and changes in the landscape.
2. Development of a series of annotated historic maps to assist in the identification of wahi pana.
3. Oral history interviews and consultation with kama'aina (native residents) and others with knowledge of the land.
4. Spatial analysis and mapping of wahi pana.
5. Evaluation of wahi pana according to the National Register evaluation process.

The following methods were used in the research.

Ethnographic and Documentary Resources

The archival-documentary resources cited in this study were found in local and national repositories, including, but not limited to:

- The State of Hawaii
 - Archives
 - Bureau of Conveyances
 - Land Court
 - Survey Division
 - University of Hawaii Hamilton and Mookini Libraries
- The Bernice Pauahi Bishop Museum
- The Hawaiian Historical Society
- The American Board of Commissioners of Foreign Missions (Houghton Library, Harvard; digitized in the collection of Kumu Pono)
- The Mission Houses Museum & Library
- The United States Geological Survey Library (Denver, Colorado), and
- National Archives

4.1 Oral History Program

Oral history interviews are another important part of this study. A general questionnaire was developed as an outline to help direct the oral history interviews. During the interviews, historic maps were also identified and made available for use.

4.2 Mapping Methods

A key component of this study included the analysis of historic maps to develop information on the relationship of the HRTP's guideway alignment and associated facilities to the natural geographic features, traditional land uses, native tenants, and traditionally named localities. The HRTP's guideway alignment and associated facilities were overlain on these historic maps.

For this report, each wahi pana and inoa 'āina was mapped against the APE and HRTP construction footprint. Guidance regarding evaluation of TCPs was taken from National Register Bulletins 38 (Parker and King 1998) and 15 (NRHP 2002). Where TCPs intersected a portion of the HRTP alignment subject to Archaeological Inventory Survey (AIS), these AIS reports were consulted for additional information. The HRTP's previous technical documents from the Section 106 process were also consulted.

Consultation with consulting parties has been on-going since the beginning of the Section 106 process. Consultation particular to this effort has solicited input regarding TCPs and the HRTP's potential effects to them. The effort focused on four meetings held on:

- February 12, 2011
- June 23, 2011
- April 13, 2012
- May 4, 2012

In addition to these specific meetings HART and FTA have held quarterly meetings on the PA in general, to which all consulting parties are invited. The April 13, 2012 meeting was a quarterly meeting that included a presentation and discussion of the TCP effort. Summaries of all four meetings are available on the HRTP website at <http://www.honolulutransit.org>

On April 20, 2012, HART provide two reports; the Study (SRIF and Kumu Pono 2012) and the Technical Report (Kumo Pono 2012), and solicited input. Pursuant to 36 CFR 800.4 and 800.5, a meeting was held on May 4, 2012 to receive comments and input regarding identification of historic properties and the HRTP's potential effects to them. Written comments were accepted through May 7, 2012. The determination of eligibility and effect will be circulated to the consulting parties during the 30 day SHPD review period. Any additional comments will be documented and considered by the FTA.

5.1 February 12, 2011

HART and the SRIF met with members of the consulting parties to the PA, and concerned citizens in Honolulu on February 12, 2011 to review the HRTP and discuss what information needed to be gathered for a study of previously unidentified TCPs. A total of 141 parties were invited to this meeting through mass e-mail, 9 individuals attended. This meeting focused on the identification of places and people for expanded research related to previously unidentified historic properties. This meeting focused on two primary questions:

1. Are there places along or near the HRTP area that are associated with Cultural practices or beliefs that are rooted in your community's history, and are important in maintaining the cultural identity of your community?
2. Who are the best people in your community to talk to and learn about these places and their importance?

Feedback from the meeting indicated that a study of place and ties to the land and water resources were important. Stories ranged from beliefs related to gods walking the land to Pu'uloa (Pearl Harbor area) being the bread basket of the Hawaiian civilization. Several individuals were identified for possible information interviews.

5.2 June 23, 2011

A second meeting to discuss the H RTP with the consulting parties was held in Honolulu on June 23, 2011. This meeting presented the research team and explained the goals and objectives of the proposed study of previously unidentified TCPs based upon the feedback received at the February meeting. It was also identified as an additional opportunity to provide feedback on sites or people to be further consulted. Approximately 76 parties were invited to this meeting via e-mail and written notification. Seven people attended.

At this meeting the team to conduct the study was introduced. It included the SRIF Foundation and a locally recognized ethnography firm, Kumu Pono and Associates. Based upon feedback it was determined that additional work would focus on the Native Hawaiians' sense of place through place names. The work would focus on collecting information from a variety of sources include Native Hawaiian texts, and would proceed by ahupua'a (Native Hawaiian land division).

It is important to note that both meetings had additional discussions related to the archaeological research on the protection of iwi kupuna (Native Hawaiian burials). There was interest in ensuring that archaeological work would be completed prior to construction beginning, so that these sites would be protected as appropriate. PA Stipulation III addresses this effort.

5.3 April 13, 2012

This was the quarterly Programmatic Meeting with Consulting Parties. At this particular meeting an update on the TCP study was provided as well as full disclosure of the finding of "no historic properties affected" for the Honouliuli ahupua'a . NHO's present were more interested in preserving stories than finding value for nominating properties to the National Register of Historic Places. Nearly 100 parties were invited and 17 (14 consulting parties and 3 individuals) attended.

5.4 May 4, 2012

At the May 4 meeting, most input focused on the importance of documenting and sharing these important stories. Although the locations were important, there was clear general consensus that most or all of the places no longer existed. The important point was to capture these stories, whether the places exist or not.

A few places not included in the SRIF and Kumo Pono reports were discussed in this meeting. First, SHPD representatives brought attention to two fishponds along the shore line in Waimalu and Kalauao. Specific families who had owned them

include Bernard Ho, Richard Lee and the Kahale-Kaluna family. SHPD provided additional information on these families' history in Pearl City in a follow-up email.

The pond in Kalauao appears related to properties surrounding the current Sumida Watercress Farm and relate to agricultural practices prior to the Sumida's ownership. The Sumida property is already recognized as an historic property, eligible partly for its long association with cultural practices of wetland agriculture (HHCTCP 2008:4-24). The pond in Waimalu also appears on historic maps, and is located just outside the APE for this study.

Second, additional areas in Honouliuli, such as Pu`u o Kapolei, Kānehili and Kaupe`a were discussed. Pu`u o Kapolei is outside the APE. The locations of Kānehili and Kaupe`a were discussed, which resulted in identifying that the site names were reversed on the report's map, and that their locations should be plotted further makai. The discussion highlighted the difficulty in plotting sites and in potentially conflicting information gathered when studying them. The proper naming has been added to the maps in this report. Moving Kānehili and Kaupe`a further makai moves them further from the H RTP.

Third, the importance of Pu`uloa was emphasized. This is the traditional name for what is now Pearl Harbor. The waters of Pu`uloa were protected by the shark goddess Ka`ahupāhau, her brother, Kahi`ukā, and the little shark god Ka`ehu-iki-manō-o-Pu`uloa. The study addresses many wahi pana associated with Pu`uloa, but has considered the waters themselves outside of the APE.

The importance of several sites already described in the reports was stressed. One consulting party expressed a genealogical link to Ha`eana Heiau (#8), and Halaulani (#9). The importance of properly blessing areas such as Kaho`ai`ai before construction was emphasized.

During the meeting there was considerable discussion of these sites' current condition. The consensus from the consulting party group was that these sites "are not there anymore." This speaks to the issue of "integrity" as described in National Register Bulletin No. 15 (see above). While many of the sites are locally significant, few retain sufficient integrity to link the physical property to the story that meets National Register criteria. No one expressed any ongoing visitation or use of any of these sites, nor has the research and interview process identified information regarding continued use of any of these sites.

Only two comments were submitted at the end of the consulting party review period. One was provided to the Kako`o, who relayed it to HART. It identifies no additional resources for study or thoughts on effects. It expresses unease for the H RTP and discusses iwi kupuna and the H RTP's AIS work. The second was a communication between a consulting party and Kumu Pono regarding the articulation between sites of spiritual or ceremonial importance to Native Hawaiians and the federal Section 106 process, expressing a lack of interest in the federal process.

The study documented 49 sites, including ahupua'a. Of these 49, 26 are wahi pana, or sacred and storied places. This includes the Leina a ka 'uhane as a single property, rather than its multiple constituent parts (see below), but excludes Po'ohilo as it was addressed in correspondence dating to April 20, 2012 (Attachment A). Another ten sites are inoa 'āina, or named places. Inoa 'āina are distinct from wahi pana in that they lack any story. Thirteen are ahupua'a, or traditional land divisions.

Each ahupua'a are plotted in Figure 1. Individual ahupua'a have not been considered as wahi pana or TCPs in this study for the reasons put forth in the Management Summary (SRIF and Kumu Pono 2012:42). The ahupua'a are considered parts of the land division system that lend context to individual wahi pana:

“Ahupua'a are generally land divisions that extend mauka to makai and contain within them different resource zones ranging from mountain forests to the coastal plain and the near shore ocean (see the discussion on the traditional resource management system, above). Within each zone, a variety of plant and animal life was traditionally collected for use by the Hawaiian people as indicated in many of the accounts provided above. The brilliance of the ahupua'a system is that all the resources needed to sustain life were available to the people who lived within each district. Resources were collected by the maka'āinana for sustenance and to provide tribute to the ali'i. The ali'i, in turn, distributed these as needed or offered them to the akua to ensure the continued flow of mana. The rhythm of life within each district was both a practical and spiritual matter expressed in the concept of aloha 'āina. To this day, Native Hawaiians use the resource zones within the ahupua'a for traditional purposes. We believe the ahupua'a are constituent parts of a broader Hawaiian cultural landscape within which are undoubtedly hundreds or even thousands of named places. It is within this context that the wahi pana identified in or near the H RTP are next discussed.”

Note that in traditional times, the land area known as Pu'uloa was an 'ili of Honouliuli, and it was sold as a separate land during the time of the Māhele. Though it is included and listed separately in this study, Pu'uloa is not an ahupua'a.

The study identified several wahi pana that are related to one another through the same story. This is the Leina a ka 'uhane, or Spirit Leaping Off Place (SRIF and Kumu Pono 2012:50-53). According to traditional Hawaiian beliefs, the leaping off place is where the souls of the dead leave this world to enter the next. “A breadfruit tree (Ulu-o-lei-walo) near the Leina a ka 'uhane is used by the soul for this purpose. To reach the next world, the soul, guided by its aumakua (a deified ancestor), must choose one of two branches resulting either decent to Po, the underworld, overseen by the akua Milu, or passage to the 'aumākua world (SRIF and Kumu Pono 2012:50)”.

The management summary considers the Leina a ka 'uhane as a single district of several wahi pana that crosses from Moanalua and Halawa ahupua'a to Honouliuli ahupua'a (Figures 2 and 3). Spirits would leap from the five wahi pana in Moanalua and Halawa. If not escorted by an aumakua, spirits would land and wander Kānehili and Kaupe'a on the 'ewa side. However, there are no stories associated with the area between the two sides of the Leina. More importantly, there is no tangible element or property referent that binds the two areas together.

National Register Bulletin #38 clearly states "This Bulletin does not address cultural resources that are purely "intangible"—i.e. those that have no property referents—except by exclusion" and "the National Register is not the appropriate vehicle for recognizing cultural values that are purely intangible, nor is there legal authority to address them under 106 unless they are somehow related to a historic property (Parker and King 1998:3)" For these reasons it is best to consider the two sides of the Leina that do retain physical property referents as distinct sites. In this light, the wahi pana associated with the Leina are all outside of the HRTPs APE.

Seventeen wahi pana and 5 inoa 'āina are within the APE. After study and review, the FTA has determined that the inoa 'āina are not historic properties. Each inoa 'āina within the APE is discussed in detail below, but lacking any story, none of them provide a connection to historic people or events. There is no integral link between the story and place, and so no measure of integrity is applicable. Each site is discussed below with their name, site number corresponding to the maps in Attachments D and E in SRIF and Kumu Pono (2012), and the list of TMKs each site intersects.

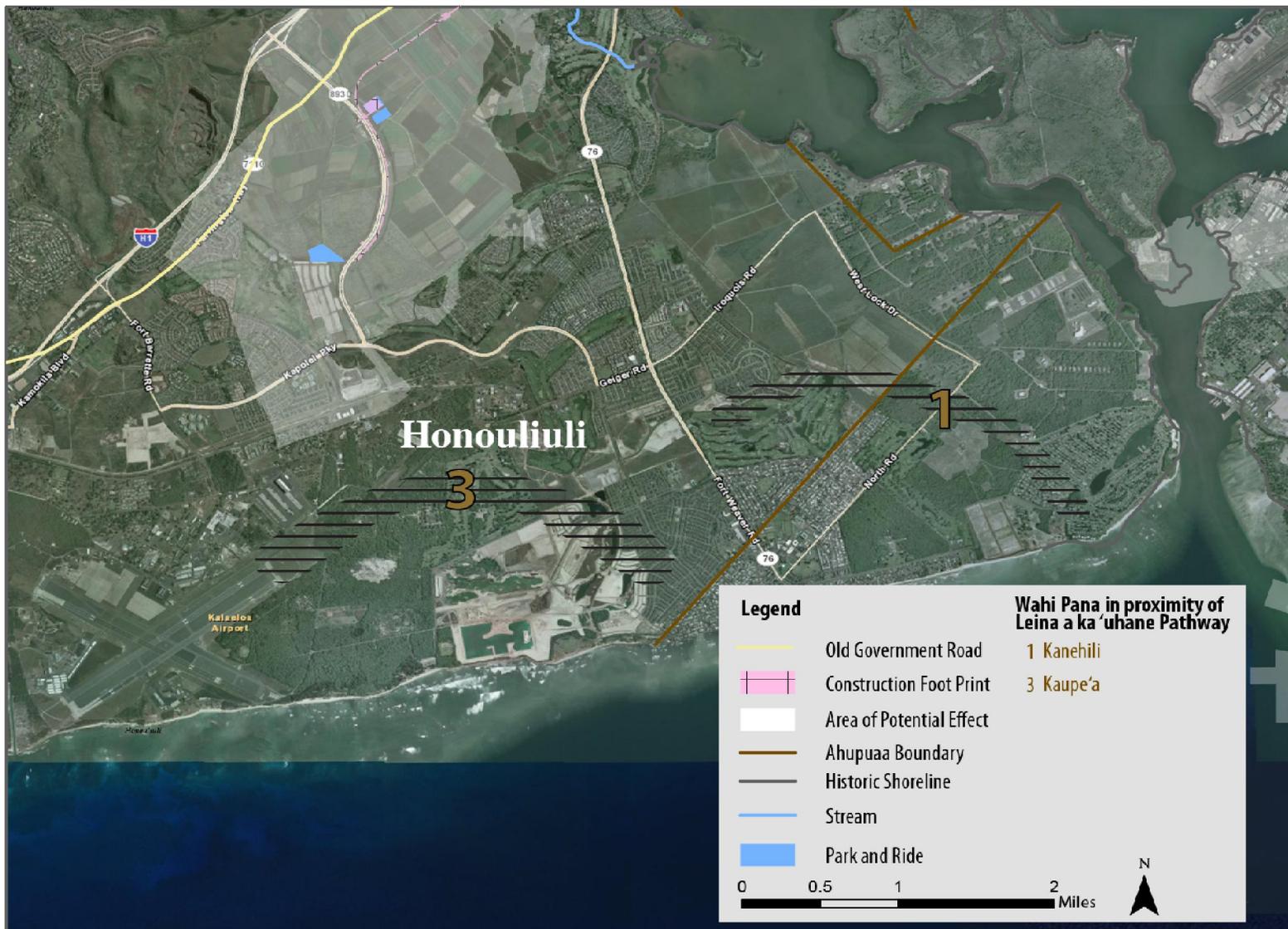


Figure 2. Leina A Ka 'Uthane Sites in Honouliuli

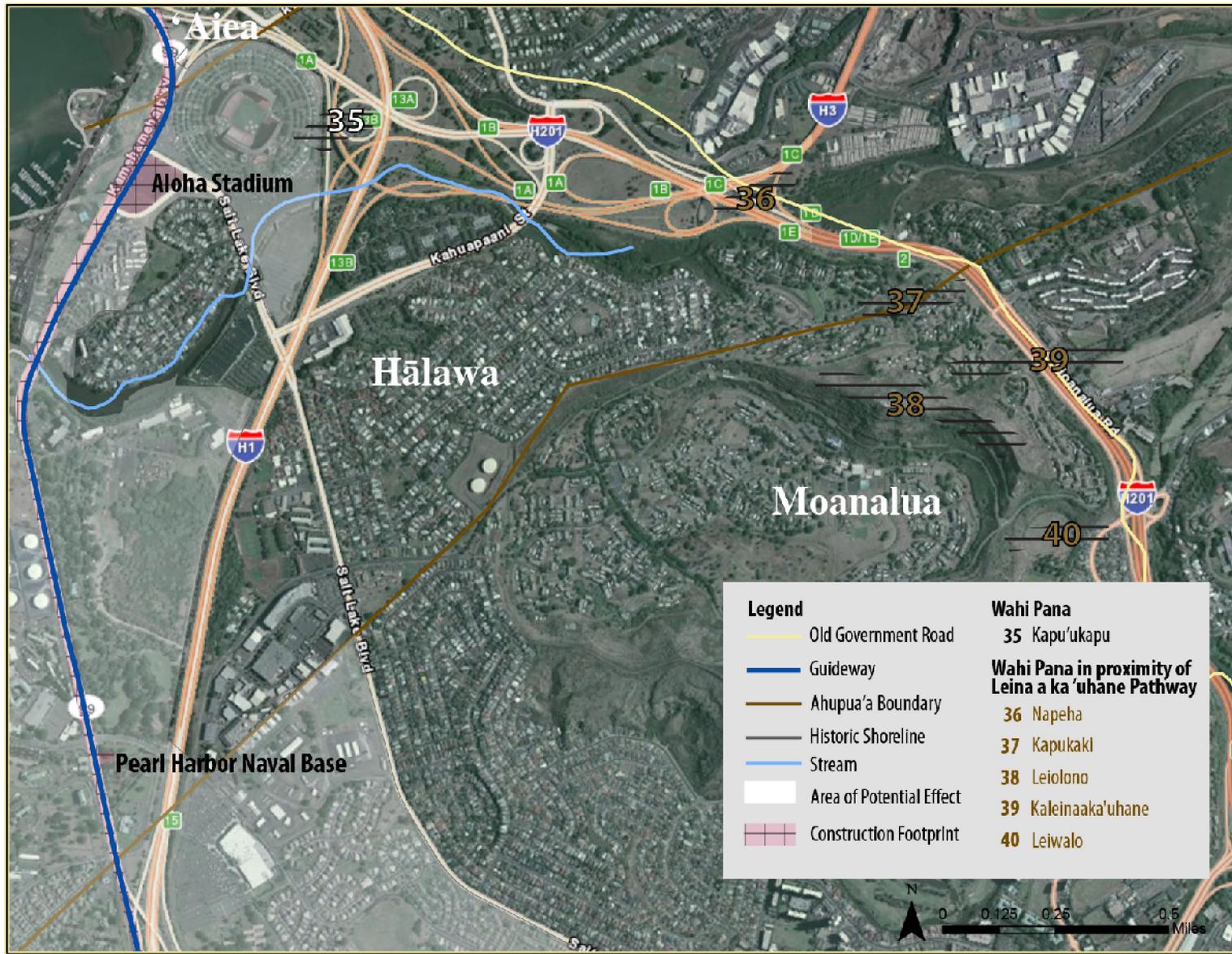


Figure 3. Sites in Moanalua and Hālawa

6.1 Kanupo‘o (Site #7, inoa ‘āina, TMK 94014058)

An ‘ili (Land division). Bounded by a stream gulch marking the boundary with the ‘ili of ‘Ōhūa and adjoining Auali‘i. Cited in claims of the Mahele. The name may be translated as meaning, “Planted skull” and seems to imply an event of some importance. A tradition for this name has not been located, though it may be tied to events of the battle at Kipapa and the naming of Po‘ohilo, at Honouliuli (SRIF and Kumu Pono 2012:48).

6.1.1 National Register Criteria

Kanupo‘o is an inoa ‘āina, or named place, but not a wahi pana (sacred and storied place). This distinction means that no story or oral tradition has been identified for this place. No consulting party has added any information that may add story. Thus the site is not associated with people or events important in history, is not associated with the work of a master etc. As inoa ‘āina, it is not likely to yield any information important to history or prehistory. For these reasons, it does not meet any National Register criteria.

6.1.2 Integrity

Since the site is not one that includes built environment, integrity of design, materials and workmanship do not apply. Because the site lacks any story of significance, integrity of setting, feeling and association likewise do not apply. The site has been completely developed through building subdivisions (Figure 4). Any surface manifestation of the site is completely obscured by this development.

6.1.3 Determination

Given this analysis Kanupo‘o does not meet any National Register criteria, and does not retain association of condition or relationships. For this reason, FTA has determined that the site is not eligible for nomination to the NRHP. Therefore the site will not be analyzed for effect or mitigation.

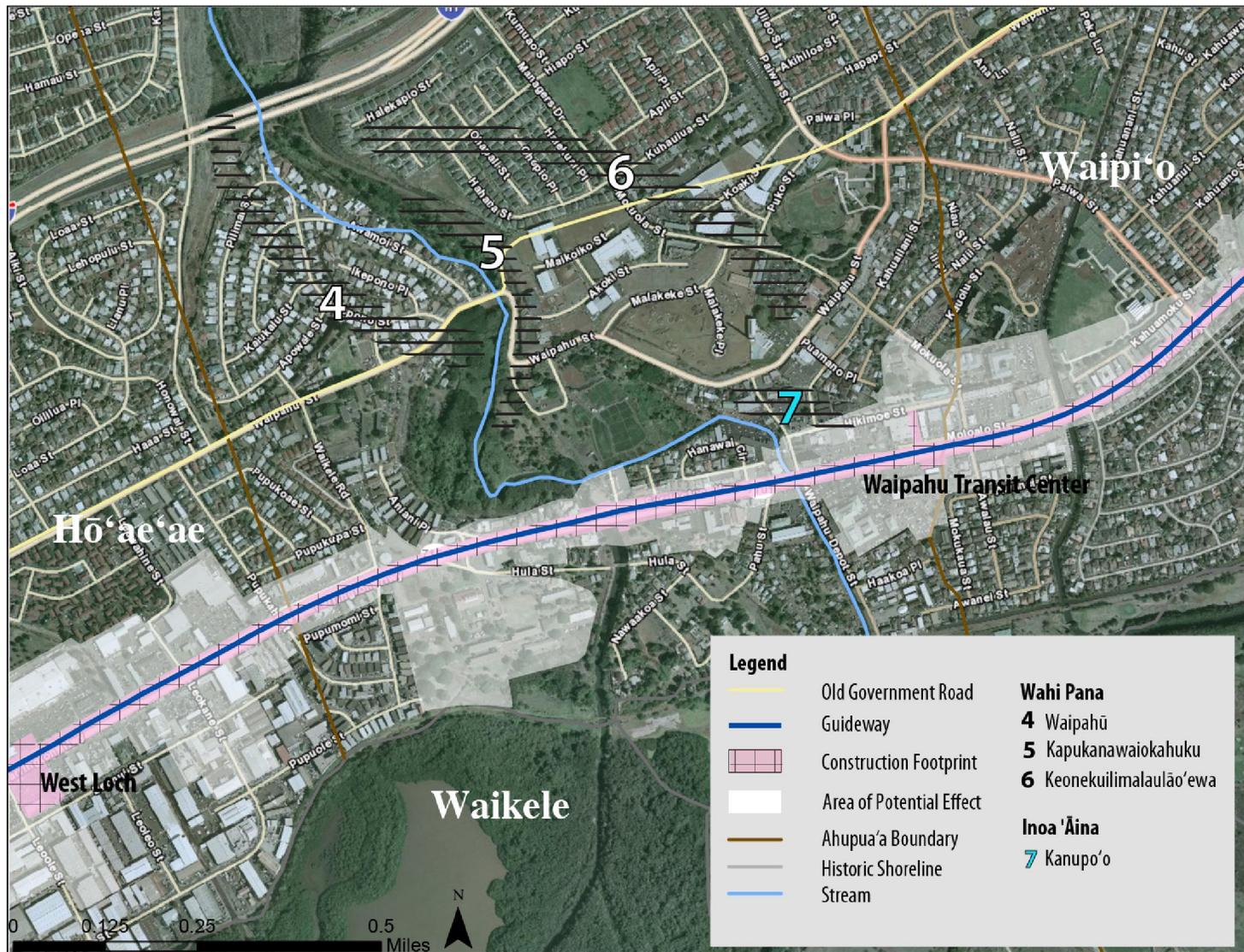


Figure 4. Sites in Hō'ae'ae, Waipi'o and Waikele

6.2 Hā'ena Heiau (Ahu'ena) (Site #8, a wahi pana, TMK 94008020)

A heiau situated at Hālaulani. Following his conquest of O'ahu in the battle of Nu'uuanu (1795), Kamehameha I prepared to carry the battle to Kaua'i. He declared a kapu on the heiau of Hā'ena to his god Kūkā'ilimoku (S.M. Kamakau, 1961:173). John Papa Ii, who was later granted title to Waipi'o, and lived at Hālaulani, was the last person to care for the heiau and its gods (SRIF and Kumu Pono 2012:43).

6.2.1 National Register Criteria

Hā'ena Heiau (Figure 5) is associated with the historical figure Kamehameha I; the akua Kūkā'ilimoku and the with historical figure John Papa Ii. Because this heiau is associated with the lives of persons significant in our past, this site meets National Register criterion B. The site likely meets criterion A for its association with Kamehameha's kapu preparing for battle on Kaua'i. The original heiau would likely have met criteria C and D as well but there is no indication that it still exists with any physical integrity (see below).

6.2.2 Integrity

The site is plotted within a modern subdivision, and within Waipahu High School. There is no indication that the heiau still exists. Because no heiau exists, it does not retain integrity of materials, workmanship or design. Most of the sediments in this area are modern fill and so it is unlikely that the site would hold subsurface component. However if it is found to have a subsurface component, those remains would not retain integrity of design or workmanship. Moreover, the sites current condition compromises its integrity of setting, feeling and association. It retains integrity of location.

6.2.3 Determination

Given this analysis the FTA has determined that the current site is **not eligible** for nomination to the National Register. Although clearly an important place, the heiau does not retain sufficient integrity to qualify for NRHP eligibility.

6.3 Hālaulani (Site #9, a wahi pana, TMK 94008010, 94008020, 94008025)

An 'ili situated between the ponds of in the land of Hālaulani, the heiau called Ahu'ena or Hā'ena, which was used in the time of Kamehameha I, and last cared for by John Papa Ii, who was granted fee-simple interest in the land during the Māhele (SRIF and Kumu Pono 2012:43).

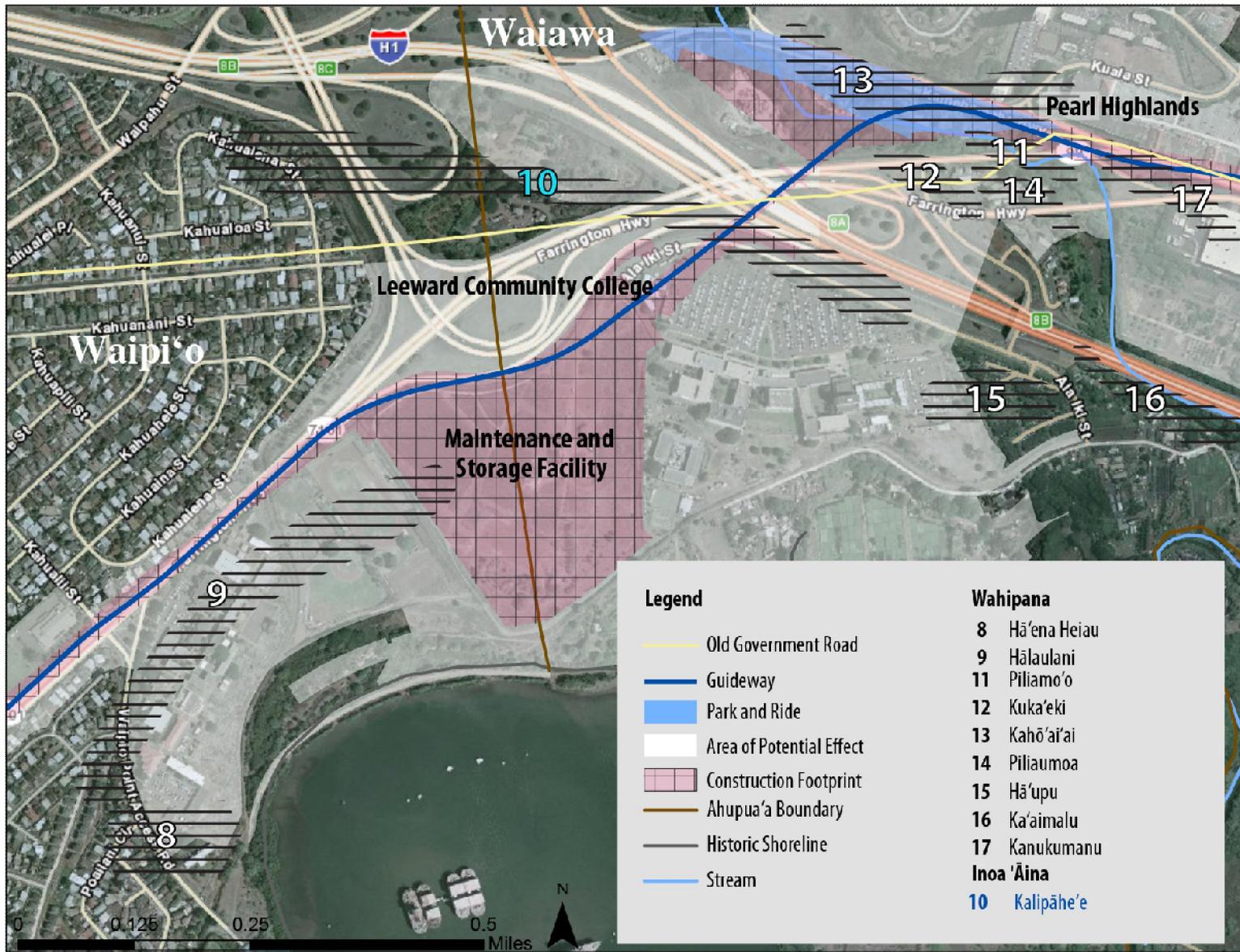


Figure 5. Sites in Waipi'o and Waiawa

6.3.1 National Register Criteria

This site is an 'ili, or land division (Figure 5). The heiau within this area is discussed above. John Papa Ii is an important figure in Hawaiian history, and this area takes some significance from having held the Hā'ena heiau. Its association with John Papa Ii meets National Register criterion B. Aside from the heiau the site is not an architectural property, and so would not meet criterion C. AIS work in the area identified no cultural remains.

The site is unlikely to yield information important to history, and is therefore not eligible under criterion D.

6.3.2 Integrity

Aside from the heiau, the site does not include any built environment, and integrity of design, workmanship and materials does not apply. Given that the TCP mapping effort is accurate, the site does retain integrity of location. The site straddles modern subdivisions, roadways and Waipahu High School, elements that bear no association to the historic people and events it is associated with. Therefore it lacks integrity of association, feeling, and setting.

6.3.3 Determination

Given this analysis the FTA has determined that the current site is **not eligible** for nomination to the National Register. Although clearly an important place, the associated heiau does not retain sufficient integrity to qualify as a contributing element of this larger property.

6.4 Kalipāhe'e (Site #10, a wahi pana, TMK 96003043, 96003048, 96003049, 96004019)

The plain lands above Mohoa and the old Waiawa Protestant church. The old government road crossed over this kula. In historic times there was a horse racing track here which was last used in ca. 1898. Afterwards the sugar plantation cleared the area for planting cane (SRIF and Kumu Pono 2012:48).

6.4.1 National Register Criteria

Kalipāhe'e (Figure 5) is an inoa 'āina, or named place, but not a wahi pana (sacred and storied place). This distinction means that no story or oral tradition has been identified for this place. No consulting party has added any information that may add story. Thus the site is not associated with people or events important in history, is not associated with the work of a master etc. AIS work in the area encountered natural strata but no cultural remains. As inoa 'āina, it is not likely to yield any

information important to history or prehistory. For these reasons, it does not meet any National Register criteria.

6.4.2 Integrity

This site straddles many modern contexts, including residential subdivisions, Leeward Community College, freeway, highway and associated ramps. Since the site is not one that includes built environment, integrity of design, materials and workmanship do not apply. Because the site lacks any story of significance, integrity of setting, feeling and association likewise do not apply.

6.4.3 Determination

Given this analysis Kalipāhe'e does not meet any National Register criteria, and does not retain association of condition or relationships. For this reason, FTA has determined that the site is **not eligible** for nomination to the NRHP. Therefore the site will not be analyzed for effect or mitigation.

6.5 Piliamo'o (Site #11, a wahi pana, TMK 96003014, 96003022, 96004006)

Piliamo'o was a supernatural woman who had both lizard and human forms. She met and fell in love with Kuka'eki, and together, they speared 'o'opu fish in Waiawa stream. Near the place named Kuka'eki, just on the edge of Mohoa, where the bridge crosses Waiawa gulch, Piliamo'o and Kuka'eki assumed stone forms. They were among the famous places pointed out by residents of the land (SRIF and Kumu Pono 2012:46).

6.5.1 National Register Criteria

The site Piliamo'o is associated with Piliamo'o and Kuka'eki, who fished here in Waiawa Stream. Figure 5 presents the site within the APE, and Figure 6 illustrates the site with the construction footprint. Both Piliamo'o and Kuka'eki are important to local history so the site meets NRHP criterion B. The site is not linked to any historic event, so it does not meet criterion A. Because the site does not include built environment, it does not meet criterion C. The site is not the kind of event that would lead to any physical (archaeological) record within the site. Moreover, AIS excavation in the Waiawa Stream and springs has indicated that the subsurface deposits are non-natural fill. When natural strata were encountered, they are alluvial deposits not more than ca. 50 years old (Hammatt 2010:356-402). Thus, it is unlikely the site has any potential for subsurface cultural deposits. Therefore, the site does not meet criterion D.

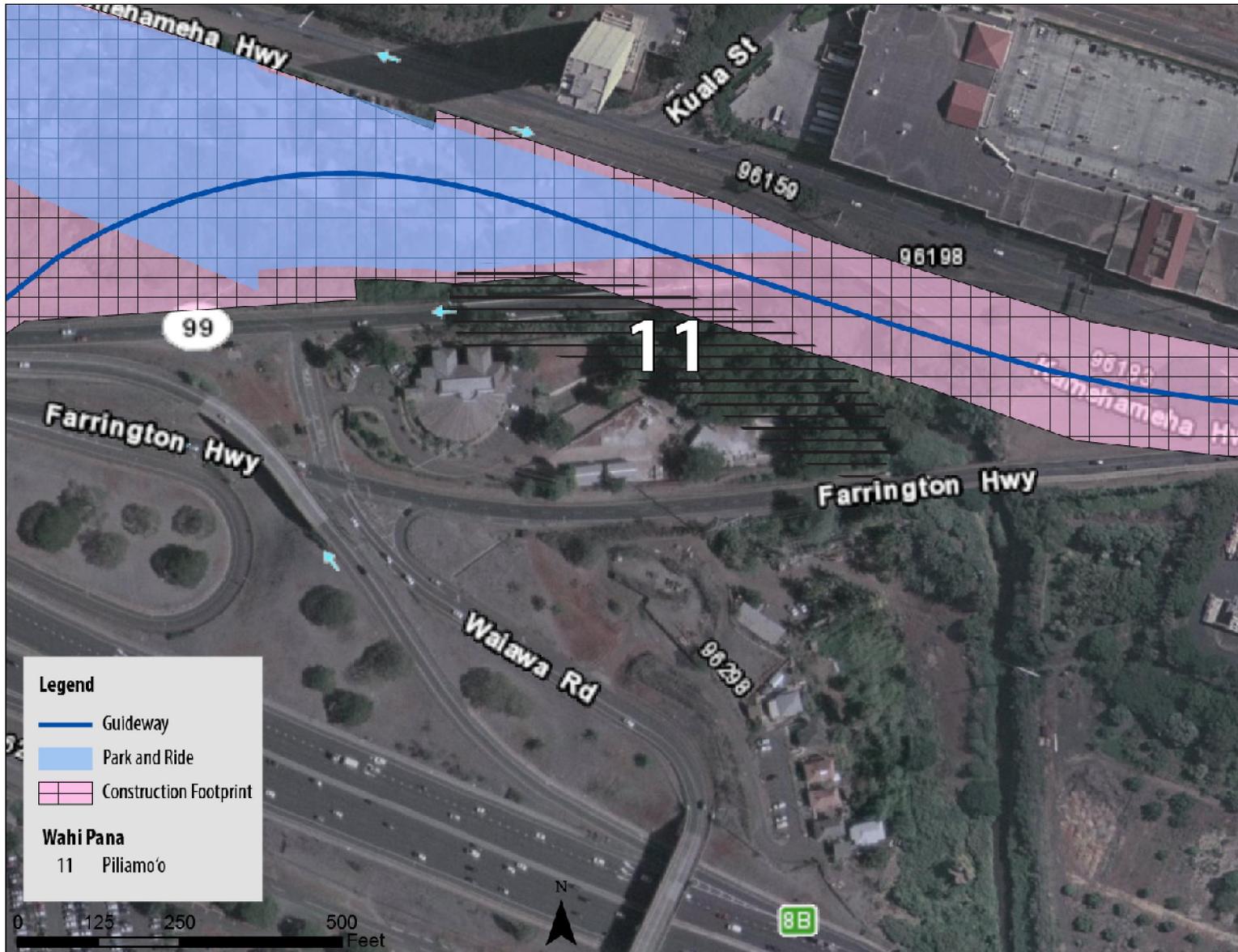


Figure 6. Piliamo'o with Construction Footprint

6.5.2 Integrity

Since the site is not one that includes built environment, integrity of design, materials and workmanship do not apply. Given that the TCP mapping effort is accurate, the site does retain integrity of location. The site straddles Farrington Highway, and is immediately adjacent to Kamehameha Highway, and is near Pearl Highlands Center. Portions of the site have been impacted by residential and other uses within the “Banana Patch.” None of the storied rocks are still present. The course of Waiawa Stream in this area has been altered. Given the development within and surrounding the site, it does not retain integrity of association, feeling or setting. Figure 7 presents photograph of the site.

6.5.3 Determination

The site meets National Register criteria A and B. However, there has been significant modern impact to the site, destroying its integrity. For these reasons FTA has determined that Piliamo’o is **not eligible** for nomination to the National Register.



Figure 7. Waiawa Stream at Piliamo’o facing southeast

6.6 Kuka‘eki (Site #12, a wahi pana, TMK 96003022, 96003043)

Situated at Mohoa, on the edge of the gulch crossed by the bridge of the government road. Named for a young man, who became the husband of Piliamo‘o. They both fished for ‘o‘opu in the Waiawa stream. They had dual body-forms and eventually took their lizard (water spirit forms), and were later turned to stones which were pointed out to travelers (SRIF and Kumu Pono 2012:46).

6.6.1 National Register Criteria

The site Kuka‘eki is associated with Piliamo‘o and Kuka‘eki, who fished here in Waiawa Stream. Figure 5 presents the site within the APE, and Figure 8 illustrates the site with the construction footprint. Both Piliamo‘o and Kuka‘eki are important to local history so the site meets NRHP criterion B. The site is not the location of a specific historic event, and so the site does not meet NRHP criterion A. Because the site does not include built environment, it does not meet criterion C. The historic event is not the kind of event that would lead to any physical (archaeological) record within the site. Moreover, AIS excavation in the Waiawa Stream and springs has indicated that the subsurface deposits are non-natural fill. When natural strata were encountered, they are alluvial deposits not more than ca. 50 years old (Hammatt 2010:356-402). Thus, it is unlikely the site has any potential for subsurface cultural deposits. Therefore, the site does not meet criterion D.

6.6.2 Integrity

Since the site is not one that includes built environment, integrity of design, materials and workmanship do not apply. Given that the TCP mapping effort is accurate, the site does retain integrity of location. The site straddles Farrington Highway, and the site area is landscaped fill associated with the development of modern highways. None of the storied rocks are still present. The course of Waiawa Stream has been altered in this area. In these ways, the site has lost its integrity of association, setting and feeling.

6.6.3 Determination

The site meets National Register criteria A and B. Through significant modern impacts the site has lost integrity. For these reasons FTA has determined that Kuka‘eki is **not eligible** for nomination to the National Register.

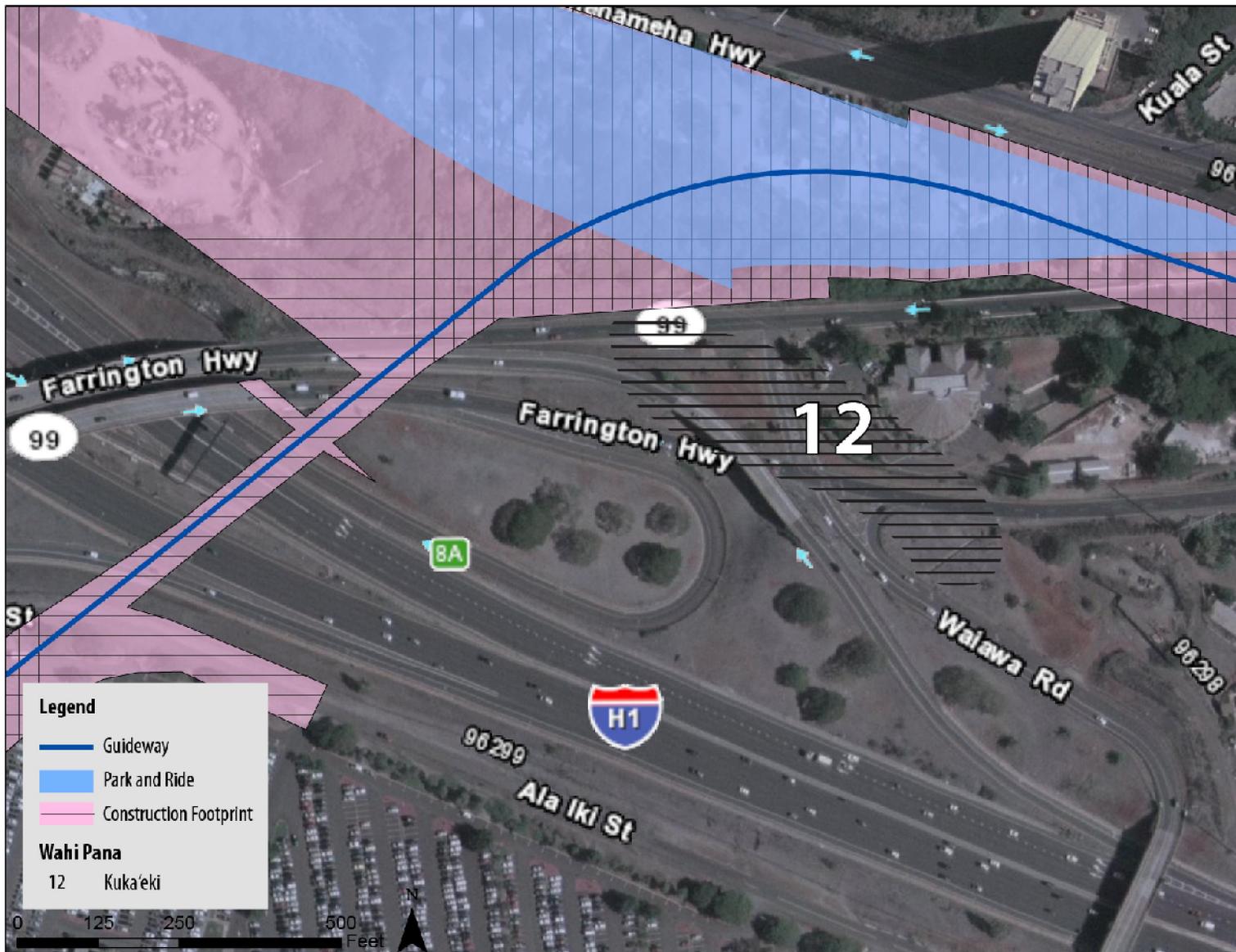


Figure 8. Kuka'eki with Construction Footprint

6.7 Kahō'ai'ai (Site #13, a wahi pana, TMK 96003012, 96003013, 96003014, 96003015, 96003016, 96003017, 96003018, 96004006, 96004017, 97024034)

Named for one of four chiefesses who turned to stone, and stood as guardians over the trail that passed between 'Ewa and other districts. During the "Waipi'o rebellion" in which Maka'i-olu and other chiefs loyal to Kahahana, king of O'ahu, sought to avenge their king's murder, Kahekilis' forces killed so many people that the stream of Kahō'ai'ai was blocked by their bodies (SRIF and Kumu Pono 2012:44).

6.7.1 National Register Criteria

Kahō'ai'ai is associated with akua chiefess Kahō'ai'ai. Figure 5 presents the site within the APE, and Figure 9 illustrates the site with the construction footprint. It is also associated with historical figure, Maka'i-olu. Thus, site meets NRHP criterion B for association with people important to history. It is not associated with an historic event and does not meet criterion A. The site is not eligible under criterion C, as it does not represent the work of a master, etc. AIS excavation in the Waiawa Stream and springs has indicated that the subsurface deposits are non-natural fill. When natural strata were encountered, they are alluvial deposits not more than ca. 50 years old (Hammatt 2010:356-402). Thus, it is unlikely the site has any potential for subsurface cultural deposits. Therefore it is not eligible under criterion D.

6.7.2 Integrity

Since the site is not one that includes built environment, integrity of design, materials and workmanship do not apply. Given that the TCP mapping effort is accurate, the site does retain integrity of location. The site is located within the "Banana Patch," a residential community that has had impacts to the site. It is located between H-1, H-2, Kamehameha Highway, Farrington Highways and their associated ramps. The site is also partially Pearl Highlands Center, a high rise building, and Kuala Street. None of the storied rocks are still present. The course of Waiawa Stream, has been altered in this location. Therefore, the site does not retain integrity of association, feeling or setting. Figure 10 presents photographs of the site.

6.7.3 Determination

The site meets National Register criterion B. Through some significant modern impacts the site has lost any integrity of association, feeling and setting. For these reasons FTA has determined that Kahō'ai'ai is **not eligible** for nomination to the National Register.

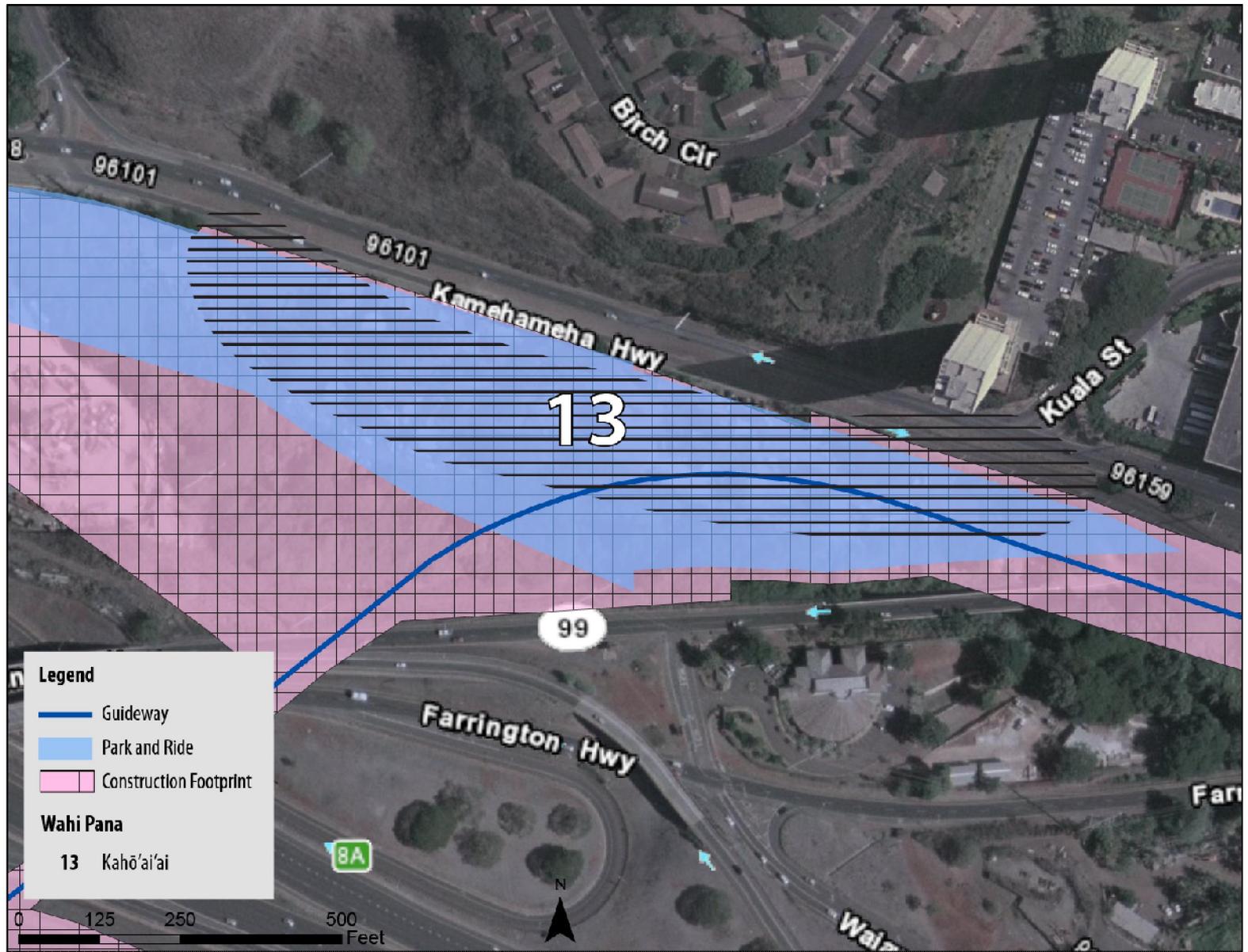


Figure 9. Kahō'ai'ai with Construction Footprint



Figure 10a. Kahō'ai'ai at east edge of Waiawa Stream



Figure 10b. Kahō'ai'ai at bridge on 'ewa end of site

6.8 Piliaumoa (Site #14, a wahi pana, TMK 96003022, 96003024, 96003045)

The near shore waters of Piliaumoa were frequented by the shark god Kahi'ukā. This place is not far from Kanukuokamanu (SRIF and Kumu Pono 2012:47).

6.8.1 National Register Criteria

The story of Piliaumoa is limited to the presence of the shark god Kahi'ukā. Figure 5 presents the site within the APE, and Figure 11 illustrates the site with the construction footprint. The story refers to the 'near shore waters,' while the wahi pana identified with this story is located well mauka, by Waiawa Stream. It is likely that this mauka location is not associated with the stories of Kahi'ukā or any related event, and so would not meet NRHP criterion A or B. As a non-architectural property this site does not meet NRHP criterion C. Since the plotted location is likely not the storied location, the site is unlikely to yield any information import to history.

It may be the case that some other wahi pana near the shore is associated with Kahi'ukā, but it is not consistent with this location.

6.8.2 Integrity

Because the identified site is not associated with the described story, there is no integral relationship between place and story, and no measure of integrity is applicable.

6.8.3 Determination

For these reasons, FTA has determined that Piliaumoa is **not eligible** for nomination to the NRHP.

6.9 Hā'upu (Haupu'u) (Site #15, a wahi pana, TMK 96003039, 96003048)

A low hill rising from the shore, where was once an ancient village site, a kahua maika ('ulu maika game field), and a heiau (temple). When the Gods Kāne and Kanaloa walked the lands of 'Ewa, giving life and sustaining resources to those people who were worshipful, they traveled to and stood atop the summit of Hā'upu. From their vantage point they looked out across landscape and Kāne called out in a chant describing the scene, naming noted places and resources of the land. Among the noted places were the fishponds of Kuhialoko, Kuhiawaho; the salt beds of Nīnauele; the coconut grove of Hape; the kalo patches of Moka'alikā; the spring of Ka'aimalu; and the 'awa patch of Kalāhikiola. Hā'upu is the site where the Ewa mission church (Protestant), Kahikuonālani was situated (SRIF and Kumu Pono 2012:43).

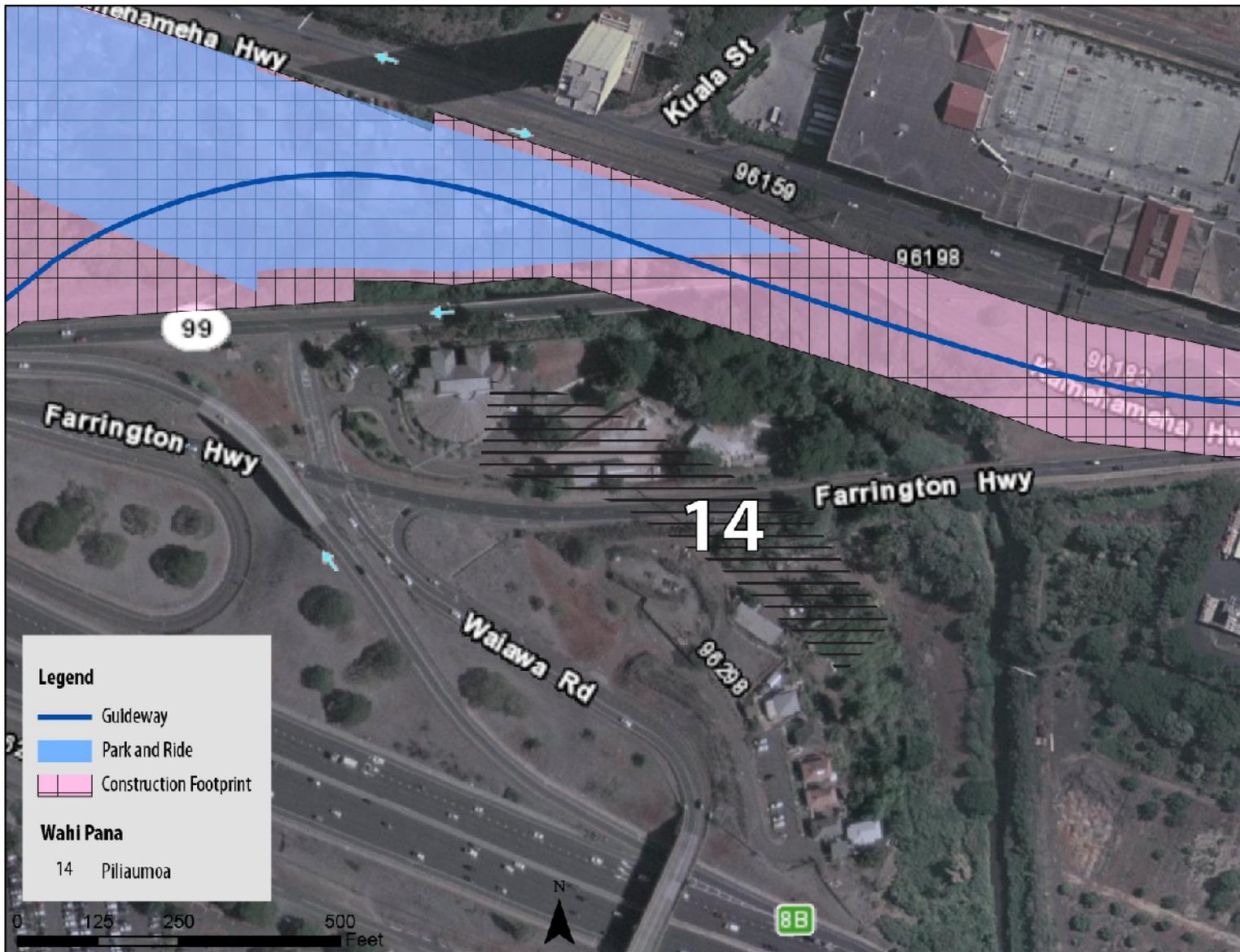


Figure 11. Piliaumoa with Construction Footprint

6.9.1 National Register Criteria

Hā'upu (Figure 5) is associated with the gods Kāne and Kanaloa, and the naming of several *wahi pana* in the area, as well as a pattern of traditional taro use. For these reasons the site meets NRHP criteria A and B. The story is not associated with any built environment, and so the site does not meet NRHP criteria C. The site is not the kind of site that lends itself to physical (archaeological) remains and does not meet NRHP criteria D.

6.9.2 Integrity

The non-architectural elements of the site do not lend themselves to integrity of workmanship, design and materials. The site is currently a parking lot for Leeward Community College, and residential subdivision. The site may retain integrity of location. Because the site is currently a parking lot and residential subdivision. It does not retain integrity of feeling or setting. Some of the locations of *wahi pana* Kāne and Kanaloa named from this site may be present, and so the site may retain integrity of association.

6.9.3 Determination

The site meets NRHP criteria A and B. However, the site has been altered by the parking lot at LCC and no longer retains any connection to its historic setting, and has lost its integrity. The FTA had determined this site is **not eligible** for nomination to the NRHP.

6.10 Kanukumanu (Site #17, a wahi pana, TMK 96003022, 97023003, 97023017)

A low hill on the shoreward side of the old government road. Named for a young boy of the same name, son of the chief of Waiawa. Just past Kanukuokamanu, towards Honolulu, are found several "royal" stones, named, Kahō'ai'ai, Waiawakalea, Piliaumoa and Kahe'ekuluaikamoku, who were once ancient chiefesses. Their attendants were Nohoana, Kikaeleke, Piliamo'o and Nohonakalai; and together, these stones were guardians of the trail (SRIF and Kumu Pono 2012:44).

6.10.1 National Register Criteria

The story of Kanukumanu (Figure 5) indicates that the site is associated with an historical figure. Kanukumanu was the son Chief of Waiawa. It is also associated by proximity with the akua Kahō'ai'ai, Waiawakalea Piliaumoa and Kahe'ekuluaikamoku. Therefore it meets NRHP criterion B. It is not the site of a significant historic event, and so it does not meet NRHP criterion A. Since no part of the site incorporates built environment, it does not meet criteria C. The site is not the kind of site that lends itself to physical (archaeological) remains and does not meet

NRHP criteria D. The royal stones associated with other personages may meet criteria B, but the stones are not located at this site.

6.10.2 Integrity

Since the site is not one that includes built environment, integrity of design, materials and workmanship do not apply. The stones in question were east of this location at other wahi pana captured in this study. The site is currently the location of Home Depot and portions of the Kamehameha Highway. A portion of the site does not have modern development on it, but is on fill associated with the construction of Kamehameha. There is no indication of the storied hill, or the historic trail. Thus the site does not retain integrity of association, feeling, or setting. It may retain integrity of location. Figure 12 presents a photograph of the site.

6.10.3 Determination

Given this analysis the FTA has determined that Kanukumanu is **not eligible** for nomination to the NRHP.



Figure 12. Kanukumanu from Home Depot

6.11 Nāpōhakuluahine (Site #18, a wahi pana, TMK 97024002, 97024006, 97024028, 97024033, 97024045)

This place was named for four old women who were chiefesses of the land. They and four of their attendants took stone forms along the side of the ancient trail (later the old government road), and were guardians for those who traveled the trails between 'Ewa and Honolulu. These storied stones were near Kanukuokamanu. The elder chiefesses (stones) were Kahō'ai'ai, Waiawakalea, Piliaumoa, Kahe'ekulu-aikamoku; their attendants (stones) were Nohoana, Kikaeleke, Piliamo'o and Nohonakalai. These stones were pointed out by kama'āina into the late 1890s (SRIF and Kumu Pono 2012:46).

6.11.1 National Register Criteria

The story of Nāpōhakuluahine (Figure 13) is associated with an historically important trail, and a pattern of traditional land use. This suggests the site meets NRHP criterion A. It is associated with four akua chiefesses: Kahō'ai'ai, Waiawakalea, Piliaumoa, Kahe'ekulu-aikamoku and their attendants. Therefore it meets NRHP criterion B. Since no part of the site incorporates built environment, it does not meet criteria C. The site is not the kind of site that lends itself to physical (archaeological) remains and does not meet NRHP criteria D.

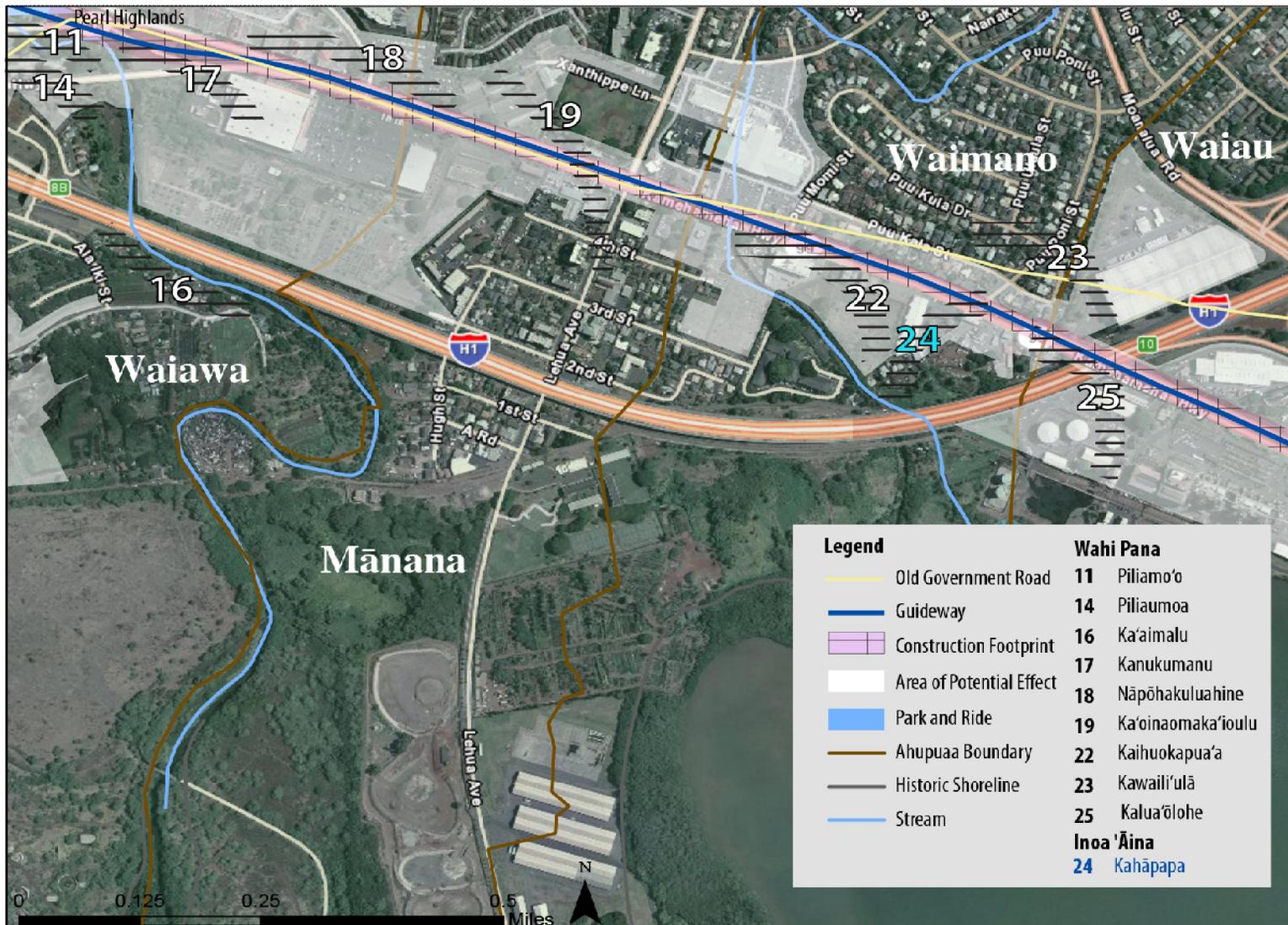


Figure 13. Sites in Waiawa, Mānana, Waimano and Waiau

6.11.2 Integrity

Since the site is not one that includes built environment, integrity of design, materials and workmanship do not apply. The site is currently the location of a U.S. Post Office, Pearl Highlands Center, and Acacia Road. There is no indication of the storied hill, or the historic trail. Thus the site does not retain integrity of association, feeling, or setting. It may retain integrity of location. Figure 14 presents photos of the site.

This and the previous story clearly indicate that the royal stones in question were somewhere in this general vicinity of the trail upon which old government road was built. No additional information has been provided in any of the extensive consultation on TCPs. Nonetheless the same logic describe above applies. As with Kanukumanu and Nāpōhakuluahine, the site, wherever it is, is not one that includes built environment, meaning integrity of design, materials and workmanship do not apply. A portion of the site does not have modern development on it, but is on fill associated with the construction of Kamehameha. There is no indication of the storied hill, royal stones, or the historic trail. Thus the site does not retain integrity of association, feeling, or setting.

6.11.3 Determination

For the reasons outlined above, the FTA has determined that the site is **not eligible** for nomination to the NRHP.

6.12 Ka'oinaomaka'ioulu (Site #19, a wahi pana, TMK 97022008, 97022021, 97022022, 97022023, 97024002)

This site is named in honor of a famous warrior Maka'ioulu, who fought a battle here. Maka'ioulu was a warrior chief who served Kahahana, king of O'ahu, in the battles against the invading forces of Maui, led by Kahekili. This place is situated not far from the old 'Ewa Court house. Cited in the traditions of Makanike'oe and Na Wahi Pana o Ewa (1899). The chief Kahahana was betrayed and killed, and Maka'ioulu and a band of warriors sought to rebel against Kahekili in the battle called Ka-pō-luku on the plains of Mānana (Kamakau 1961:139). Kaoinaomaka'ioulu is situated near the old government road, on the Honolulu side of Kanukuokamanu (SRIF and Kumu Pono 2012:45).

6.12.1 National Register Criteria

Ka'oinaomaka'ioulu (Figure 13) is associated with the story of a famous battle and is associated with a locally significant figure in Maka'ioulu. Both the battle and Maka'ioulu are historically significant and so FTA has determined that Ka'oinaomaka'ioulu meets National Register criteria A and B. It does not meet criteria C or D, as it is a physical locality that does not include the work of a master, etc, and does not offer data potential.



Figure 14a. 'Ewa across Nāpōhakuluahine



Figure 14b. Koko Head across Nāpōhakuluahine

6.12.2 Integrity

The site straddles Kamehameha Highway and is completely developed by highway and subdivisions. These developments obscure any physical manifestation of the past battlefield. As a battlefield, it is not the kind of site that would be visited or used for any sort of traditional manner today. There are no existing relationships to Maka'ioulu. Figure 15 presents a photograph of the site.

AIS testing within the highway in this area reveals that most all subsurface deposits are non natural fill, to depths of ca. 150 cm below ground surface (Hammat 2010:403-412). It is therefore unlikely that any archaeological evidence of this TCP is present.



Figure 15. Ka'oinaomaka'ioulu northwest from Lehua Street

6.12.3 Determination

Given this analysis Ka'oinaomaka'ioulu does not retain association of condition or relationships. For this reason, FTA has determined that the site is **not eligible** for nomination to the NRHP. Therefore the site will not be analyzed for effect or mitigation.

6.13 Kaihuokapua‘a (Site #22, a wahi pana, TMK 97019010, 97019035, 97034001, 97034002, 97034004, 97034028, 97034030, 97034032, 97034033)

Described as a large stone near the government road marking the boundary between the ‘ili of Kaholona and Poupouwela. The stone had the shape of a pig’s snout. In 1899, it was situated across from the house of A. Kauhi. The pig form is associated with Lono and ceremonies of land divisions and tribute (SRIF and Kumu Pono 2012:44).

6.13.1 National Register Criteria

Ceremonial significance was attached to the stone and therefore the stone would have met NRHP criterion B. No significant event has been identified, and so the site does not meet NRHP criterion A. As a non-architectural feature it does not meet criteria C. The story does not provide any event that may have produced physical (archaeological) remains, so the site does not meet criteria D.

6.13.2 Integrity

Since the site is not one that includes built environment, integrity of design, materials and workmanship do not apply. The site may retain integrity of location (Figure 13 and Figure 16). The stone is no longer at the site. The site is entirely developed by Kamehameha Highway and strip malls. Moreover, the story indicates that the stone had been moved away from this location by 1899. Thus the site lacks integrity of setting, feeling and association.

6.13.3 Determination

Considering the evaluation above, the FTA has determined that this site is **not eligible** for nomination to the NRHP.



Figure 16a. Kaihuokapua'a looking makai



Figure 16b. Kaihuokapua'a looking along Kamehameha Highway

6.14 Kawaili‘ulā (Waili‘ulā) (#23)

Situated between the 9 and 12 mile marker on the old government road. The woman, Kawai-li‘ulā was guided out of Kaleinaaka‘uhane, restored to life, and returned to her home at Waipuhia. The place where she lived bears her name (SRIF and Kumu Pono 2012:45).

6.14.1 National Register Criteria

This site is associated (Figure 13) with an event wherein Kawai-li‘ulā is lead out of Kaleinaaka‘uhane, restored to life, and returned to her home at Waipuhia. In this way the site meets NRHP criterion A. Without association to an historically significant person, it does not meet criterion B. As a non-architectural site, it does not meet criteria C. The site is not the kind of site that lends itself to physical (archaeological) remains and does not meet NRHP criteria D.

6.14.2 Integrity

Since the site is not one that includes built environment, integrity of design, materials and workmanship do not apply. It may retain integrity of location. The site is currently a Sears distribution center and a residential subdivision. There is no remaining evidence of Kaleinaaka‘uhane or Government Road. The site lacks any integrity of setting, feeling and association.

6.14.3 Determination

Given this analysis the FTA has determined that the site lacks sufficient integrity of setting, feeling and association and is **not eligible** for nomination to the NRHP.

6.15 Kahāpapa (Site #24, an inoa ‘āina, TMK 97019011, 97019012, 97019029, 97019035, 97029011, 97029017, 97029018)

An ‘ili. Cited in Project area claims of the Māhele. Bounded on the makai side by the government road, and Kaihuokapua‘a (SRIF and Kumu Pono 2012:47).

6.15.1 National Register Criteria

Kahāpapa is an inoa ‘āina, or named place, but not a wahi pana (sacred and storied place). This distinction means that no story or oral tradition has been identified for this place. No consulting party has added any information that may add story. Thus the site is not associated with people or events important in history, is not associated with the work of a master etc. As inoa ‘āina, it is not likely to yield any information important to history or prehistory. For these reasons, it does not meet any National Register criteria.

6.15.2 Integrity

Since the site is not one that includes built environment, integrity of design, materials and workmanship do not apply. Because the site lacks any story of significance, integrity of setting, feeling and association likewise do not apply. The site has been impacted through modern buildings and development. Any surface manifestation of the site is completely obscured by this development. Figure 13 provides a map of the site and Figure 17 provides photos.

6.15.3 Determination

Given this analysis the FTA has determined that the site does not meet any NRHP eligibility criteria, and lacks sufficient integrity of setting, feeling and association and is **not eligible** for nomination to the NRHP.



Figure 17a. Kahāpapa makai along site



Figure 17b. Kahāpapa ‘ewa along Kamehameha Highway

6.16 Kalua‘ōlohe (Site #25, a wahi pana, TMK 97019013, 97019028, 97019045, 98003010, 98003032)

An ‘ili. There is a storied cave here in which a supernatural dog once lived. When this dog, Kū-‘īlio-‘ula, showed itself, it was usually a portend of some event, like the passing of a chief or changes in the government (SRIF and Kumu Pono 2012:44).

6.16.1 National Register Criteria

The story indicates the importance of a cave within this ‘ili. The tradition of the supernatural dog Kū-‘īlio-‘ula meets NRHP criterion B. No specific historic event is identified, so the site does not meet criterion A. Since the site is not one that includes built environment, it does not meet NRHP criterion C. The site is not the kind of site that lends itself to physical (archaeological) remains and does not meet NRHP criteria D. There is no indication of a remaining cave.

6.16.2 Integrity

Since the site is not one that includes built environment, integrity of design, materials and workmanship do not apply. The site may retain integrity of location (Figure 13). The site has been impacted by the construction of a strip mall, a power plant, Kamehameha Highway, and the H-1. No tangible manifestation of the site exists. For these reasons the site lacks integrity of association, feeling and setting. Figure 18 presents photographs of the site.



Figure 18. Kalua'ōlohe makai across Kamehameha Highway

6.16.3 Determination

Considering the discussion above, the FTA has determined that the site is **not eligible** for nomination to the NRHP.

6.17 Huewaipī (Site #28, a wahi pana, TMK 98005009, 98005010, 98005011, 98005012, 98005013, 98005014, 98005015, 98005016, 98020054, 98020057, 98020058, 98020059, 98020060, 98020061, 98020063, 98020064, 98020065, 98020066, 98020067, 98020071)

A spring situated near Kauhihau and Nāpōhakuloloa, in the vicinity of the old government road. Huewaipī also called Kawaipī, supplied people of this area with drinking water (SRIF and Kumu Pono 2012:43).

6.17.1 National Register Criteria

Nothing in the associated story indicates any relationship to an important person or event, or provides an integral link to the water provided by this spring. As described, the site does not meet NRHP criteria A or B. As a non-architectural site, it does not

meet criterion C, and nothing about the story lends itself to physical, (archaeological) remains. Therefore it does not meet criterion D.

The site is the spring that feeds Waiau wetlands in Waimalu (Figure 19), which is currently used for subsistence farming and gardening. Historic maps indicate that the wetland site was also once a loʻi. The spring, wetland and loʻi are related as one larger, single site. As a whole, the site inclusive of Huewaipī and Waiau wetlands meets NRHP criterion A for its association to the loʻi, and traditional agricultural practices.

6.17.2 Integrity

Since the site is not one that includes built environment, integrity of design, materials and workmanship do not apply. The site may retain integrity of location. The plot of Huewaipī at this site is within a modern subdivision that is unrelated to its historic context, which compromises its integrity of feeling, association and setting. However Waiau wetlands is evident and retains much of its integrity of association. The area surrounding the site is significantly altered from its historic setting and feeling by the development of modern subdivisions and Kamehameha Highway. It does not retain its integrity of setting or feeling.

6.17.3 Determination

Given that the site is the location of traditional agricultural practice and retains integrity of location and association, the FTA has determined that this site is **eligible** for nomination to the NRHP.

6.18 Kauhihau (Site #29, a wahi pana, TMK 98006020, 98006021, 98006024)

A gulch crossed by the old government road, and the site of two stones who were the sons of Maihea (k.) and Punahinalo (w.), and the elder brothers of Nāʻulaamaihea. The boys were named Pūnana-loa-a-Maihea and Kaʻakakai-a-Maihea. They took their stone forms prior to the arrival of Kāne and Kanaloa, and birth of Nāʻulaamaihea. The house of Maihea and his family was situated on the hill just above the old road, near these two large stones. The stones are also known by the single name, Nāpōhakuololoa. Just below this place is Huewaipī (Kawaipī), the spring which supplied people of this area with drinking water (SRIF and Kumu Pono 2012:45).

6.18.1 National Register Criteria

This site is associated with Pūnana-loa-a-Maihea and Kaʻakakai-a-Maihea, and their relationship to an historic trail. This meets NRHP criterion B. No element of the story deals with an historic event, so the site does not meet criteria A. As a non-

architectural site, it does not meet criterion C, and nothing about the story lends itself to physical, (archaeological) remains. Therefore it does not meet criterion D.

6.18.2 Integrity

Since the site is not one that includes built environment, integrity of design, materials and workmanship do not apply. The site may retain integrity of location (Figure 19). The site is currently located within a modern residential subdivision, with no indication of the gulch or trail which compromises its integrity of feeling, association and setting.

6.18.3 Determination

The site meets NRHP criteria B, but lacks its integral relationships to the gulch and trail. The FTA has determined that the site is **not eligible** for nomination to the NRHP.

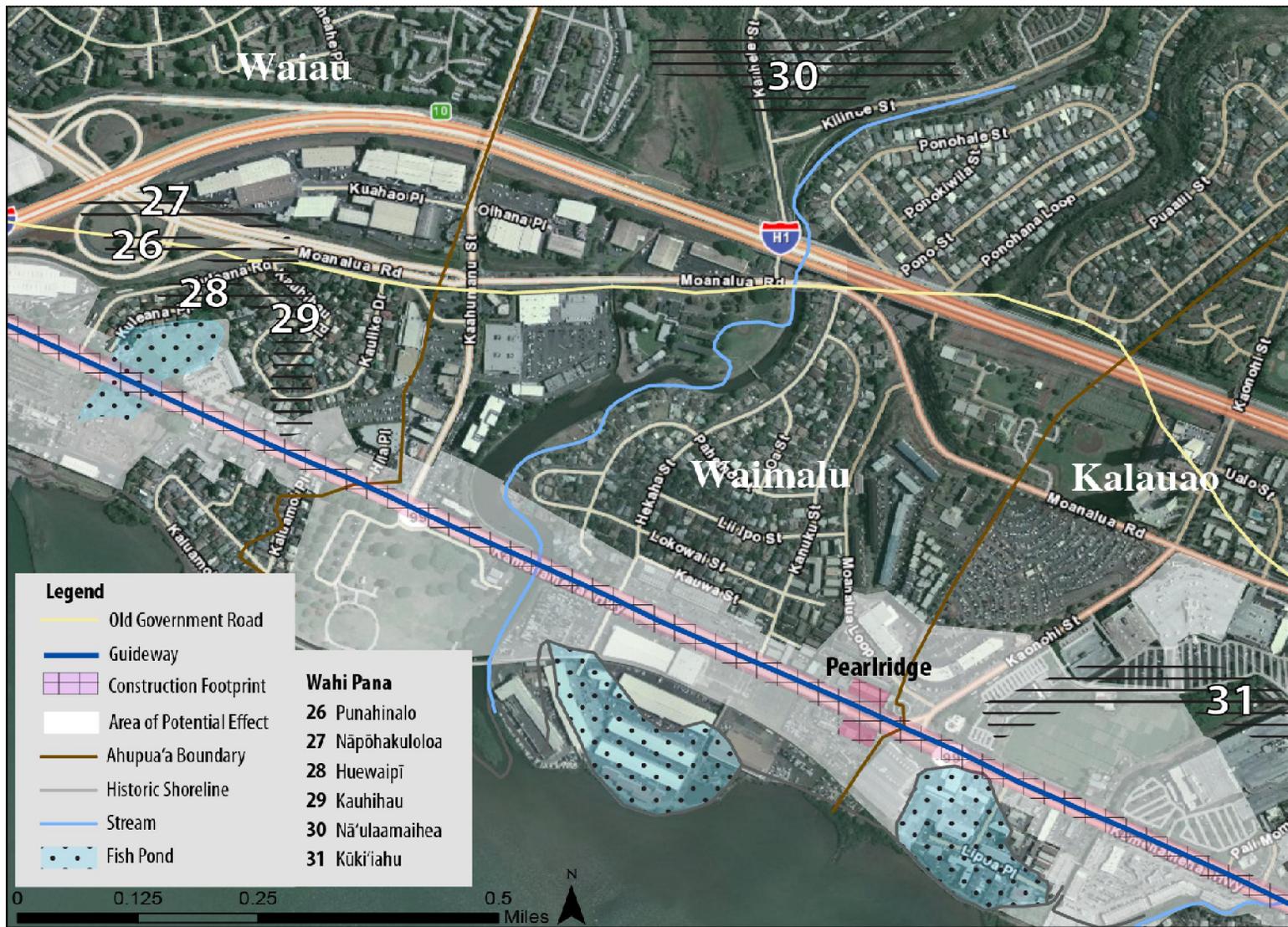


Figure 19. Sites in Waiu, Waimalu and Kalauao

6.19 Kūki‘iahu (Kūki‘i) (Site #31, TMK 98016031, 98016047, 98016051)

In late 1794, a battle was fought here between the warriors of Kā‘eokūlani and Kalanikūpule. Kā‘eokūlani was killed in this battle. The dead were gathered and taken down to the shore at Pa‘aiau and piled high (SRIF and Kumu Pono 2012:46).

6.19.1 National Register Criteria

This wahi pana is the location of an historically significant battle involving historically significant people. Therefore it meets NRHP criteria A and B. As a non-architectural site, it does not meet criterion C. Although battle sites can leave physical (archaeological) remains, this site is currently Pearlridge Center and Sumida Watercress farm, and it is unlikely to yield any information important to history. Therefore it does not meet criterion D.

6.19.2 Integrity

As a non-architectural site, integrity of design, materials and workmanship do not apply. The site may retain integrity of location (Figure 20). Having been impacted by the shopping mall and watercress farm it does not retain integrity of feeling, association and setting.

6.19.3 Determination

The mapped TCP overlaps a great deal with the Sumida Watercress farm which has previously been determined to be an historic property. The eligibility justification provided (HHCTCP 2008:4-24) clearly indicates that Sumida Watercress farm is an eligible TCP for its associations to wetland agriculture over time. Kūki‘iahu itself lacks any integrity of association, feeling and setting, and on its own would not be NRHP eligible. Because the watercress farm has already been identified as an eligible TCP, the FTA still finds this site to be **eligible** for nomination to the NRHP.

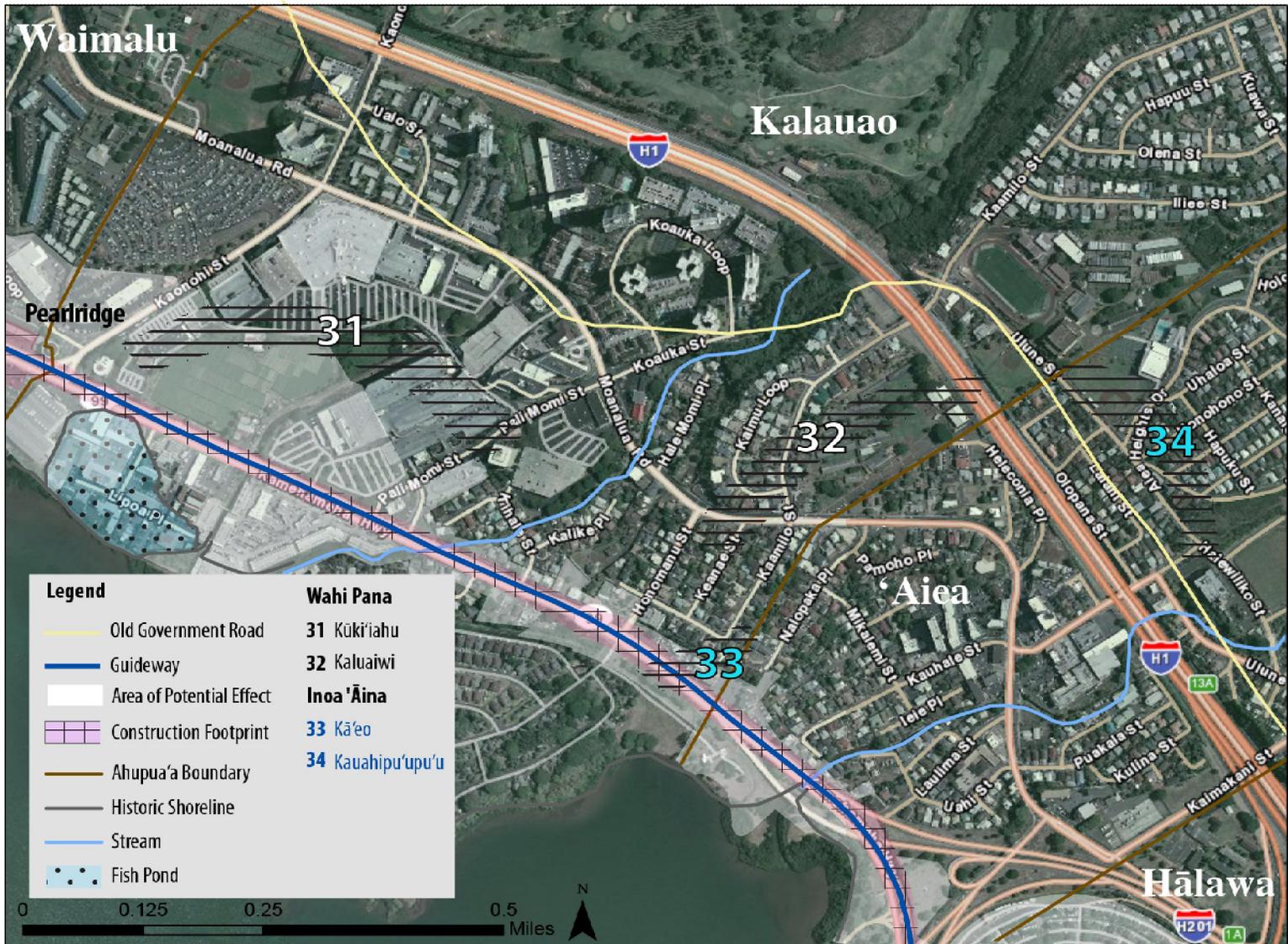


Figure 20. Sites in Kalauao and 'Aiea

6.20 Kā'eo (Site # 33 an inoa 'āina, TMK 98018021, 98018023, 98018024, 98019006)

A dryland site near the shore, along boundary of 'Aiea and Kalauao; near former house site of Dr. Seth Ford (SRIF and Kumu Pono 2012:47).

6.20.1 National Register Criteria

Kā'eo is inoa 'āina, or a named place, but not a wahi pana (sacred and storied place). This distinction means that no story or oral tradition has been identified for this place. No consulting party has added any information that may add story. Thus the site is not associated with people or events important in history, is not associated with the work of a master etc. As inoa 'āina, it is not likely to yield any information important to history or prehistory. For these reasons, it does not meet any National Register criteria.

6.20.2 Integrity

As a non-architectural site, integrity of design, materials and workmanship do not apply. The site may retain integrity of location (Figure 20). The site has impacted by building subdivisions and modern a modern highway. Any surface manifestation of the site is obscured by this development. Figure 21 provides a photograph of the site.



Figure 21. Kā'eo mauka across Kamehameha Highway

AIS testing within the highway at Kā'eo reveals that most all subsurface deposits are non natural fill, to depths of ca. 110 cm below ground surface. Natural deposits below this yielded no cultural material (Sroat et al 2012:155-165). It is therefore unlikely that any archaeological evidence of this TCP is present.

6.20.3 Determination

Given this analysis Ka'eo does not meet any National Register criteria, and does not retain association of condition or relationships. For this reason, FTA has determined that the site is **not eligible** for nomination to the NRHP.

6.21 Kapu'ukapu (Site #35, inoa 'āina, TMK 99003061)

A lowland hill situated a short distance above Kapukakohekohe. The name, "The kapu hill" implies some sort of religious/ceremonial significance (SRIF and Kumu Pono 2012:48).

6.21.1 National Register Criteria

Kapu'ukapu is inoa 'āina, or a named place, but not a wahi pana (sacred and storied place). This distinction means that no story or oral tradition has been identified for this place. No consulting party has added any information that may add story. Thus the site is not associated with people or events important in history, is not associated with the work of a master etc. As inoa 'āina, it is not likely to yield any information important to history or prehistory. For these reasons, it does not meet any National Register criteria.

6.21.2 Integrity

The site has been completely developed through building subdivisions and modern roadways. Any surface manifestation of the site is completely obscured by this development. Figure 3 provides a map of the site.

6.21.3 Determination

Given this analysis Kapu'ukapu does not meet any National Register criteria, and does not retain association of condition or relationships. For this reason, FTA has determined that the site is **not eligible** for nomination to the NRHP.

6.22 'Au'au (Site #42, a wahi pana, TMK 11016020, 11016021, 11016026)

A cave of refuge during times of war, near the shore of Moanalua. The cave entrance was on the shore, and was connected to the uplands of Moanalua via an underground cavern. The cavern was used a route of passage by the mo'o goddess,

Kaluahine when she desired to go fishing on the shore (SRIF and Kumu Pono 2012:43).

6.22.1 National Register Criteria

'Au'au is a cave and cavern system used by the goddess Kaluahine to go fishing on the shore. As such the site would be meet NRHP criterion B. Without story that links this site to an important historic event, it does not meet NRHP criterion A. As a non-architectural site, it does not meet criterion C, and nothing about the story lends itself to physical (archaeological) remains. There is no indication of a remaining cave. Therefore it does not meet criterion D.

6.22.2 Integrity

As a non-architectural site, integrity of design, materials and workmanship do not apply. The site may retain integrity of location (Figure 22). The site is located along an historic shoreline of O'ahu that has been impacted by the development of the modern shoreline on fill, and is no longer on the shoreline. The site location is impacted by industrial development, such that there is no indication of the cave. Any association between a cave and the shoreline has been lost. The site does not retain integrity of setting, association or feeling.

6.22.3 Determination

The site may meet NRHP criterion B, but its current condition does not retain any integrity of association, feeling or setting. The FTA has determined that the site is **not eligible** for nomination to the NRHP.

6.23 Summary

Table 1 lists each site within the H RTP APE, and a summary of their NRHP eligibility criteria and integrity.

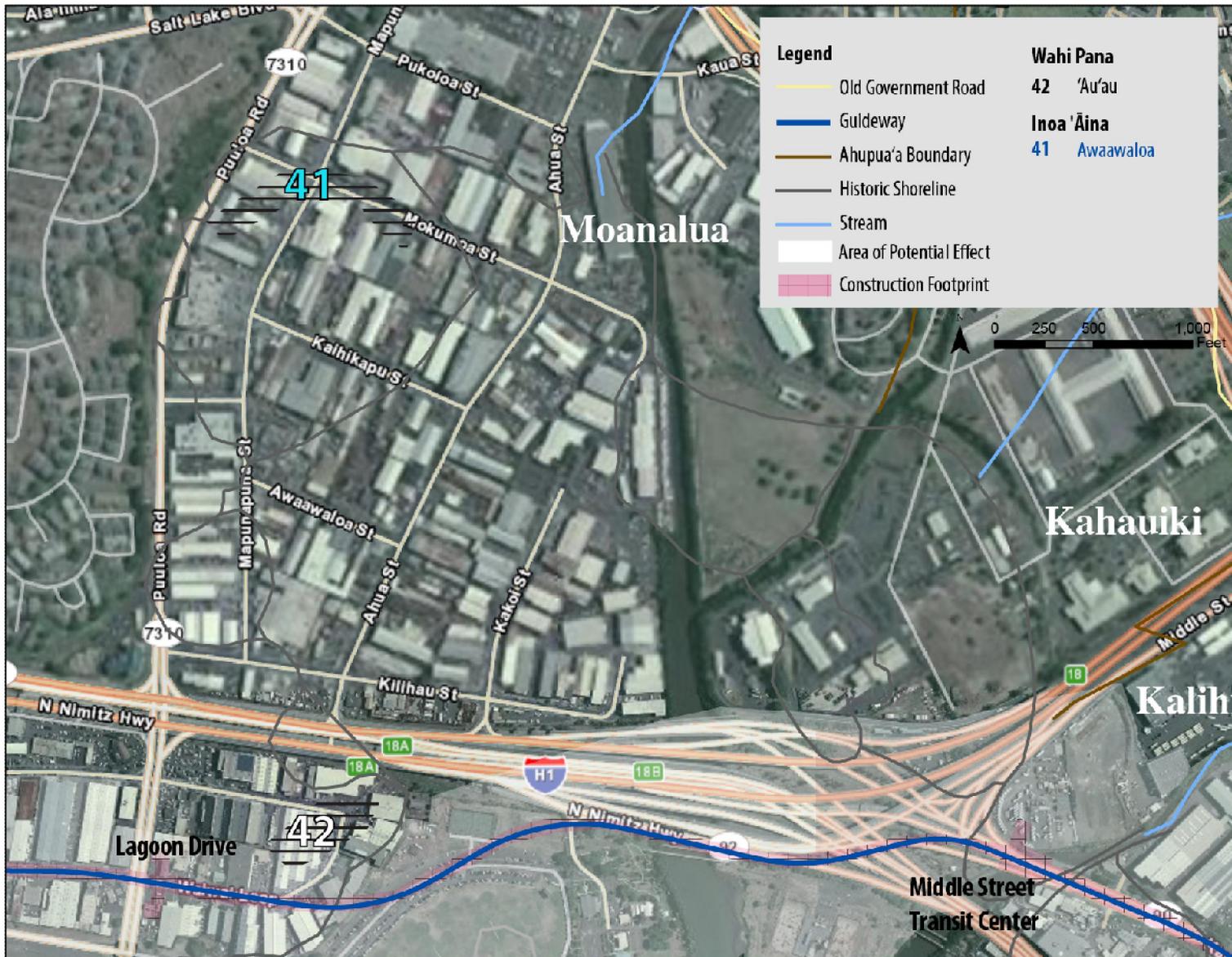


Figure 22. Sites in Moanalua

Of the 22 sites within the APE, two have been determined eligible for nomination to the National Register of Historic Places. This section evaluates the HRTTP's potential to affect those two historic properties.

7.1 Huewaipī (#28)

This site is the location of inter-related springs, wetlands and lo'i, and takes its significance from traditional agricultural practices. It meets NRHP eligibility criterion A, and retains integrity of association and location.

The HRTTP would construct an elevated guideway within the Kamehameha Highway. No stations or ancillary buildings are proposed near this site. As a wetland, the HRTTP's environmental constraints mapping already identifies the site as a no-work area. There will be no direct impact to the site.

AIS work (Sroat et al. 2012:103-107) tested the area adjacent to this lo'i within Kamehameha and found no cultural remains. Excavations revealed only fill to 160 cm below ground surface. It is likely that the historic lo'i no longer exists within the HRTTP's footprint. Therefore, no direct impacts would result.

The site is surrounded on all sides by non-historic commercial and residential properties, utility lines and Kamehameha Highway which compromises the site's integrity of feeling and setting, and the guideway would not alter any historic views. Therefore, the FTA finds that the HRTTP would have **No Adverse Effect** on Huewaipī .

7.2 Kūki'iahu (Kūki'i) (#31)

This site is situated in the same area as the Sumida Watercress Farm, although the mapped boundaries of Kūki'iahu extend into the Uptown and Downtown portions of Pearlridge Mall. As documented in the FEIS, Sumida Watercress farm has already been identified as eligible for nomination to the NRHP, and effects assessed through the Section 106 process that culminated in the signed Programmatic Agreement. As an element of this site, Kūki'iahu meets NRHP eligibility criteria A and B, but the subsequent development of wetland agriculture and establishment of the watercress farm has eliminated all elements of integrity. Therefore Kūki'iahu is a non-contributing element of the site's NRHP eligibility.

The FTA's eligibility determination and finding of **No Adverse Effect** is still appropriate (HHCTCP 2009).

8

Proposed Mitigation (if applicable)

The study identified 22 sites within the APE, two of which are determined to be historic properties. No adverse effects pursuant to 36 CFR800.5 have been found. As a result, no mitigation specific to adverse effects is warranted.

9

Educational and Interpretative Programs

HART is committed to exploring appropriate ways to share and tell these stories. This has been a common suggestion from consulting parties. The information gained from the research associated with the TCP Study discussed in this report will be used in conjunction with implementation of PA Stipulation VII. Educational and Interpretative Programs, Materials, and Signage. Suggestions heard so far include some form of published material, station naming conventions, and interpretive planning at the park-and-ride lot and transit stations along the route. HART and FTA will continue to meet with consulting parties to develop and implement an appropriate interpretive program.

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