NEIL ABERCROMBIE
GOVERNOR OF HAWAII

WILLIAM J. AILA, JR.
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

ESTHER KIA'AINA
FIRST DEPUTY

WILLIAM M. TAM
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

HISTORIC PRESERVATION DIVISION
KAKUHIHEWA BUILDING
601 KAMOKILA BLVD STE 555
KAPOLEI HI 96707

August 26, 2013

Mr. Matt McDermott
Principle Investigator
Cultural Surveys Hawai'i, Inc.
P.O. Box 1114
Kailua, Hawaii 96734
mmcdermott@culturalsurveys.com

LOG NO: 2013.2279, 2013.4326
DOC NO: 1308SL20
Archaeology

Dear Mr. McDermott:

SUBJECT: **Chapter 6E-8 and National Historic Preservation Act (NHPA) Section 106 Review – Archaeological Inventory Survey for the Airport Phase (Construction Phase 3) of the Honolulu High-Capacity Transit Corridor Project**
Halawa and Moanalua Ahupua'a, 'Ewa and Honolulu Districts, O'ahu Island
TMK: (1) 1-1 and 9-9 (Various Plats and Parcels)

Thank you for the opportunity to review this report titled *Archaeological Inventory Survey for the Airport Section (Construction Section 3) of the Honolulu High-Capacity Transit Corridor Project Hālawa and Moanalua Ahupua'a, 'Ewa and Honolulu Districts, O'ahu Island TMK Sections [1] 1-1 and 9-9 (Various Plats and Parcels)* (Hammatt et al., August 2013). We received the initial draft on March 4, 2013 and provided initial comments on March 29, 2013 (Log No. 2013.2279, Doc. No. 1303SL24).

The Honolulu High-Capacity Transit Corridor Project (HHCTCP or project) includes the use of federal funds and involves lands under several jurisdictions, including Federal, State, City and County of Honolulu, and private. Pursuant to 36 CFR §800.3(a), the proposed project constitutes an undertaking subject to review under Section 106. The project was determined to have an adverse effect on historic properties. A Programmatic Agreement (PA) stipulating mitigation commitments was executed on January 18, 2011 with the Federal Transit Administration (FTA), the Hawaii State Historic Preservation Officer (SHPO), the U.S. Navy, and the Advisory Council on Historic Preservation (ACHP) as signatories, and the City and County of Honolulu (C&C Honolulu) as an invited signatory. The Area of Potential effect for archaeology is defined in the PA as all areas of direct ground disturbance, including utilities. An archaeological inventory survey following HAR Chapter 13-276 was stipulated as a mitigation commitment in the PA.

The Airport Phase 3 archaeological inventory survey (AIS) area is from Kalaloa Drive Station 994+00 in the West to the Middle Street Station (Station 1248+00), a distance of 7.74 kilometers (4.8 miles). The Airport AIS area of potential effect (APE) comprises about 9.06 acres of direct ground disturbance, including three stations. An archaeological inventory survey plan (AISP) was prepared by Cultural Surveys Hawaii, Inc. (Hammatt and Shideler 2011). The AISP was reviewed and accepted by SHPD on December 2, 2011 (Log No. 2011.2167, Doc. No. 1211NN01). An Addendum AISP was subsequently prepared to address a possible alternative site (Alternative A) for the Honolulu International Airport Station (Hammatt and Shideler, 2013). It was reviewed and accepted by SHPD on March 1, 2013 (Log No. 2013.1957, Doc. No. 1302SL29).

The AIS involved a 100 percent surface survey of a heavily developed urban corridor which yielded no surface archaeological cultural resources (historic properties). Subsurface testing involved 47 trench test excavations, of which 40 were proposed in the AISP. The additional 7 were included to address the proposed Alternative A location for the Honolulu Airport Station. The proposed and final locations of some of the trench test excavations differ

slightly, reflecting decision changes required to address impediments (e.g., utility line locations) and/or safety issues.

Two cultural resources or historic properties were identified. They consist of Site 50-80-13-7420 (buried asphalt roadway) and Site 50-80-13-7421 (buried concrete slabs, coral pavement, and base course sections related to ca. 1942-1943 military infrastructure). Both sites are assessed as National- and Hawaii- Register eligible under Criterion D (information content). The determination for the entire project is an "adverse effect" on historic properties under 36 CFR 800 and "effect with proposed mitigation commitments" under HAR §13-275-7(2). Thus, mitigation recommendations were provided. The recommended mitigation measure identified for this undertaking involves an archaeological monitoring program.

We confirm that the archaeological inventory survey was conducted in accordance with the AISP and Addendum AISP. We provided initial comments on the draft archaeological inventory survey report (Log No. 2013.2279; Doc. No. 1303SL24). This initial, and all subsequent comments, because of their extensive nature were provided directly on the text pages of the report as well as through in-person reviews of specific areas with Cultural Surveys Hawai'i staff.

We concur that Sites 50-80-13-7429 (buried asphalt roadway) and 50-80-17-7421 (buried infrastructure) are significant under National- and Hawaii-Registers of Historic Places Criterion D only, chiefly for their information potential. We also concur with the proposed mitigation recommendation of on-call monitoring as both sites are discontinuous and fragmentary in their extent.

In addition, SHPD received 98 comments from 13 individuals or organizations regarding the Archaeological Inventory Survey (AIS) for the entire HHCTCP corridor. Thirteen of these comments were pertinent to the Airport Phase 3 Section of the HHCTCP AIS. Eleven comments requested additional testing in column locations and utilities and four expressed concern that the AIS overall was premature or not well done in general. SHPD has taken these comments into account and believes, based on background research and previous archaeological studies and the limitations on the ground (i.e. existing utilities), that the Airport Section 3 project corridor has been adequately surveyed. We believe on-call archaeological monitoring will adequately address the inadvertent discovery of historic properties, if any are found.

This revised archaeological inventory survey report meets the minimum requirements specified in the *Secretary of the Interior's Standards for Archeological Documentation* and the requirements set forth in HAR §13-275and HAR §13-276. It is accepted by SHPD. Please send one hardcopy of the document, clearly marked FINAL, along with a copy of this review letter and a text-searchable PDF version of the report on CD to the Kapolei SHPD office. Please contact Dr. Susan A Lebo at (808) 692-8019 or at Susan.A.Lebo@hawaii.gov if you have any questions regarding this letter.

Aloha,

William J. Aila, Jr.
State Historic Preservation Officer