

NEIL ABERCROMBIE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
POST OFFICE BOX 621
HONOLULU, HAWAII 96809

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

April 2, 2012

Kenneth Toru Hamayasu
Interim Executive Director and CEO
Honolulu Authority for Rapid Transportation
City and County of Honolulu
Alii Place Suite 1700
1099 Alakea Street
Honolulu, HI 96813

Dear Mr. Hamayasu:

RE: Section 106 Consultation (NHPA)
Request for Concurrence on a "no effect" determination for the Honolulu High Capacity Rail Project
Honouliuli, Ewa Moku, Oahu
TMK (1) 9-1-017:060-062; 9-1-019:001, 004-008, 013-015, 017-019, 023, 027, 029-031
(Po'ohilo TMK)

Thank you for your request for concurrence on a "no effect" determination for a possible TCP within the Honouliuli sector of the Honolulu High Capacity Rail project. We received the request by e-mail on March 20, with a request for expedited review. A second, more complete submittal was made on March 27, again, with a request to expedite. A third, revised request was submitted by e-mail on March 30, again, with a request to expedite. In support of your "no effect" determination you supplied the State Historic Preservation Office with the following materials:

- a) a letter requesting concurrence with your "no effect" determination, dated March 30, 2012.
- b) *Preliminary Draft Report: Study to Identify the presence of previously unidentified traditional cultural properties in sections 1-3 for the Honolulu High-Capacity Transit Corridor Project*, SRI Foundation and Kumu Pono Associates, March 26, 2012 (SRI and Kumu Pono Report)
- c) *He Mo'olelo 'Aina—Traditiona and storied places in the District of 'Ewa and Moanalua (in the District of Kona), Ilsland of O'ahu: A Traditional Cultural Properties Study –Technical Report*, Kumu Pono Associates, LLC, January 20, 2012 (Kumu Pono report, Jan. 20, 2012)

Stipulation II of the PA requires the HART to:

- 1) Undertake a study . . . to determine the presence of previously unidentified TCPs within the APE, which includes cultural landscapes if present.
- 2) Prior to construction commencement . . . meet with . . . parties with expertise . . . to discuss and identify potential TCPs as defined by the National Register Bulletin 38.
- 3) Undertake studies to evaluate these TCPs for NRHP eligibility in accordance with guidance in Bulletin 38
- 4) The study shall be completed by qualified staff with experience in ethnographic studies and TCP assessments for NRHP eligibility.

Stipulations II also requires that “the City complete all fieldwork, eligibility and effect determination and consultation to develop treatment measures prior to the commencement of construction.” SHPD is only able to respond at this time to a “no effect” determination for Phase I of the project, as no further effect determinations have been made.

The reports cited in b) & c) above are submitted as partial requirements for Stipulation II. HPD’s overall comment is that there are many typos, specifically in the Kumu Pono technical report that should be corrected. Additionally, we note that Stipulation II does not limit Traditional Cultural Properties (TCPs) to Hawaiian TCPs. SHPD is concerned that for Phases II-IV there may be traditional cultural places of other cultures that are being missed.

Our comments below will be limited to Honouliuli rather than to a review of the whole report due to the request to expedite and to respond specifically to the request for concurrence regarding TCP’s in Honouliuli. In general, however, if HART is going to request that we review specific pieces of the report, then it would be easier if the analysis were separated by ahupua’a. This would also allow a better analysis of how potential TCP in the Ahupua’a were determined.

Fifty-three (53) named places were noted in the Honouliuli Ahupuaa (Kumupono Associates, Jan 20, 2012). Of these, three (3) are located in the immediate vicinity of the rail project. Of the three named sites located in the APE of the rail, only one, Po’ohilo, has a story connected to it. Therefore, Po’ohilo is the only “wahi pana” or storied place forwarded for consideration as a potential TCP in the report by SRI and Kumu Pono (March 26, 2012).

Based on the report provided to SHPD, Po’ohilo is outside of the APE and will not be affected by the rail. The SHPO concurs with your determination of “no effect” to Po’ohilo based on the information provided.

For the record, the State Historic Preservation Division (SHPD) is unclear as to why Po’ohilo is considered a TCP eligible for the National Register (it may still be a TCP to Native Hawaiians). As defined in Bulletin 38 a TCP is “eligible for inclusion in the National Register 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.” There is no analysis of Native Hawaiians relationship to Po’ohilo today, or that it was ever a site of more than passing significance after the Battle of Kipapa Gulch.

We do note, however, that one Native Hawaiian informant, Mr. Michael Lee, has stated that there is a water system that carries fresh water from the mauka portion of Honouliuli to the ocean, where he gathers limu. Limu gathering is a traditional cultural practice, and the shoreline along which Mr. Lee gathers limu at Oneula is potentially eligible as a TCP. It would be an adverse effect if the rail pillars affected the water sources for the limu at Oneula. However, as indicated in your letter for concurrence, geotechnical borings have indicated that only the East Kapolei station approach or penetrate into the coralline deposits. You do not indicate whether karst caverns or water was encountered, or whether your geologists have opined on this question in the Kapolei area.

We further note that Po'ohilo is not the only TCP in the Honouliuli District. The SRI and Kumu Pono Preliminary Draft Report (March 26, 2012) notes that there is a Leina District that runs from Honouliuli to Moanalua. The sites in Honouliuli are connected with Kanehili and Kaupe'a. Neither Kanehili nor Kaupe'a are located near rail, however the district boundary as drawn runs fairly close to the East Kapolei station. No further analysis of the Leina has been conducted in relationship to the Honouliuli Ahupua'a. We suggested that before construction begins on Phase II, or perhaps sooner, additional consultation regarding the Leina Ka 'Uthane district occur.

Conclusion

SHPD concurs with the determination of "no effect" to historic properties for Po'ohilo. As no effect determinations were requested for any other sites, SHPD has commented on the Leina Ka Uthane district and on comments from Mr. Michael Lee regarding the possibility of a karst system in the Kapolei area of the rail project.

Please call Pua Aiu at 692-8040 or contact her by e-mail at pua.aiu@hawaii.gov if you have further questions regarding this letter.

Sincerely,



William Aila, Jr.
State Historic Preservation Officer



IN REPLY REFER TO:
CMS—ENV00077

HONOLULU AUTHORITY for RAPID TRANSPORTATION

Daniel A. Grabauskas
EXECUTIVE DIRECTOR AND CEO

April 12, 2012

BOARD OF DIRECTORS
Carrie K.S. Okinaga, Esq.
CHAIR

Ivan M. Lui-Kwan, Esq.
VICE CHAIR

Robert Bunda
William "Buzz" Hong
Donald G. Horner
Kesille W. K. Hui
Damien T. K. Kim
Glenn M. Okimoto, Ph.D.
David K. Tanoue
Wayne Y. Yoshioka

The Honorable William J. Aila, Jr.
Hawaii State Historic Preservation Officer
State Historic Preservation Division
Kakuhihewa Building
601 Kamokila Boulevard, Suite 555
Kapolei, Hawaii 96707

Attention: Dr. Pua Aiu, SHPD Administrator

Dear Mr. Aila:

Subject: Honolulu Rail Transit Project Traditional Cultural Properties Analysis for
Honouliuli Ahupuaa

Thank you for your April 2, 2012 letter that concurs with the determination that Poohilo, the only potential traditional cultural property (TCP) identified in the Honouliuli ahupuaa, would not be affected by the rail transit project.

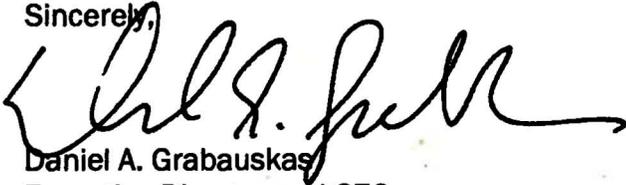
In your letter dated April 2, 2012, you noted that the map HART provided to you as part of the March 30, 2012 request for concurrence showed the district boundary for the Leina Ka Uhane runs fairly close to the East Kapolei Transit Station. At its closest point, the district boundary of the Leina is approximately 1-3 miles from the project area. The part of the alignment in the Honouliuli ahupuaa does not impact the Leina district. It will be subject to additional discussion as it does cross the alignment further east around Pearl Harbor.

In your concurrence letter, you had further comments regarding potential karst caverns. To reiterate, karst caverns, when present would be located within coral and coralline deposits. As related in our March 30, 2012 letter, with the exception of the East Kapolei Station area, all guideway foundations are within older alluvium which is distinctly different from coralline deposits. The archaeological and geotechnical investigations that have been completed to date have not encountered any indication of karst caverns in the East Kapolei Station area. Further, because the project foundations are up slope from the mauka end of the coralline lens, the project would not in any way impair the groundwater flow within the lens from mauka to makai.

The Honorable William J. Aila, Jr.
Page 2
April 12, 2012

Again, we thank you for your expeditious response to our request. Should you have any further questions, please contact Ms. Faith Miyamoto, Chief Planner, at 768-8350 or fmiyamoto@honolulu.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Grabauskas". The signature is fluid and cursive, with a long horizontal stroke at the end.

Daniel A. Grabauskas
Executive Director and CEO

cc: Mr. Ted Matley - FTA Region IX

NEIL ABERCROMBIE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

April 20, 2012

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

GUY H. KAULUKUKUI
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
KAIKOOIAWH ISLAND RESERVATION COMMISSION
LAND
STATHPARKS

Mr. Daniel A. Grabauskas
Executive Director and CEO
Honolulu Authority for Rapid Transportation
City and County of Honolulu
Alii Place, Suite 1700
1099 Alakea Street
Honolulu, HI 96813

Dear Mr. Grabauskas:

RE: Determination of Effect on Traditional Cultural Properties for Honouliuli Ahupuaa, Phase I of the Honolulu Rapid Transit Project. NHPA Section 106 Consultation on Stipulation II of the Programmatic Agreement Among the U.S. Department of Transportation Federal Transit Administration, the Hawaii State Historic Preservation Officer, the United States Navy and the Advisory Council on Historic Preservation regarding the Honolulu High-Capacity Transit Corridor Project in the City and County of Honolulu, Hawaii (PA) Honouliuli, Ewa Moku, Island of Oahu

Thank you for your letter of April 12, 2012 which we received by e-mail on April 16, 2012. Your letter responds to our letter of April 2, 2012 in which 1) we concurred with your determination of "no effect to historic properties" for Poohilo ili, a possible traditional cultural property (TCP) in the ahupua'a of Honouliuli; 2) asked for more information about the possibility of encountering water in the karst systems that may affect limu gathering at Oneula Beach, limu gathering areas are potential TCPs; and 3) asked for more information regarding the Leina a Ka Uhane District noted in your technical report.

Your response letter notes that archaeological and geotechnical investigations have encountered no indication of karst caverns at the East Kapolei Station area. Thank you for this information which we understand to indicate that underground water systems, if any, will not be impacted by the rail project.

You also note that the district boundary for the Leina a Ka Uhane is approximately 1-3 miles from the project area. You further note that "the part of the alignment in the Honouliuli ahupuaa

Mr. Daniel Grabauskas
April 20, 2012
Page two

does not impact the Leina district.” Thank you for this clarification, which we assume puts the Leina a Ka Uhane district outside the boundary of the APE. Based on the information provided, the rail will not affect viewplanes between the two sites, or between either site and the ocean. Thus, we would agree the Leina Ka Uhane district is not affected in the Honouliuli area.

In conversations with the FTA, a question regarding phasing of the Traditional Cultural Studies was raised. The SHPO has no opposition to phasing of the Traditional Cultural Studies, as long as each phase of the study is timely turned in to our office for review. This means that we need all of the information at least 30 days in advance of when you would like a response. Given that these are very large documents (in excess of 900 pages), more than 30 days would be much appreciated. We also request that you provide us with all of the relevant information with which to make a decision with your initial request.

Based on the information provided for our review, we concur that no potential traditional cultural properties identified in the Honouliuli ahupuaa will be affected by the project. Please contact myself, or Pua Aiu at 692-8040 or by e-mail at pua.aiu@hawaii.gov if you have further questions.

Sincerely,



WILLIAM J. AILA, JR.
State Historic Preservation Officer

C: Ted Matley, FTA region IX (by e-mail)
Joonsik Maing, FTA region IX (by e-mail)
Faith Miyamoto, HART (by e-mail)