

LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION
601 KAMOKILA BOULEVARD, ROOM 555
KAPOLEI, HAWAII 96707

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March 16, 2009

Mr. David Shideler
Cultural Surveys Hawai'i
P. O. Box 1114
Kailua, Hawai'i 96736

LOG NO: 2009.1325
DOC NO: 0903WT115
Archaeology

Dear Mr. Shideler:

**SUBJECT: Section 106 National Historic Preservation Act (NHPA) Review
Archaeological Inventory Survey Plan--
For Construction Phase I of the Honolulu High-Capacity Transit Corridor Project,
Station 392+00 (Near East Kapolei Station) to Station 776+00 (Near Waimano Home
Road),
Hono'uli'uli, Hō'ae'ae, Waikele, Waipi'o, and Waiawa Ahupua'a, 'Ewa
District, O'ahu, Hawai'i
TMK: (1) 0-1, 9-4, 9-5, 9-6, 9-7 (Various Plats and Parcels)**

Thank you for providing us the opportunity to review this Archaeological Monitoring Plan (AMP), (*Archaeological Inventory Survey Plan For Construction Phase I of the Honolulu High-Capacity Transit Corridor Project, Station 392+00 (Near East Kapolei Station) to Station 776+00 (Near Waimano Home Road), Hono'uli'uli, Hō'ae'ae, Waikele, Waipi'o, and Waiawa Ahupua'a, 'Ewa District, O'ahu, Hawai'i TMK: (1) 0-1, 9-4, 9-5, 9-6, 9-7 (Various Plats and Parcels)*[Hammatt and Shideler MA, March 2009]) which we received on March 10, 2009.

The transit corridor is a very complex project which includes stations, park-and-ride facilities, and piers and requires flexibility on the part of archaeological contractors in inventorying historic properties. Due to geography, urban settlement, previous archaeological work, or the lack thereof, and the non-sensitive and sensitive archaeological areas, the approach was to split the project area in to western and eastern sections with Kunia Road being the arbitrary dividing line. All aspects of the archaeological inventory survey were developed around these distinct loci.

Archaeological survey techniques to be employed are driven by the necessity to determine historic properties subsurface in areas of sensitivity. Additionally, these techniques will also confirm the lack of properties in areas not sensitive. This is an efficient and cost reducing methodology. These include test trenching, Ground Penetrating Radar (GPR) and limited areal excavations. We agree that these methods will adequately document historic properties that, if significant and with further consultation with this office, be investigated in a data recovery phase. Another measure to mitigate possible effects to historic properties, especially human burials, would be the development of a monitoring plan to address the results of this inventory survey and/or data recovery studies.

This AISP is accepted and meets the minimum standards for compliance under Hawai'i administrative Rules.

Dr. David Shideler

Page 2

We are in receipt of a hardcopy of this document, which we will mark as FINAL. Please send text-searchable PDF version on CD along with a copy of this review letter to the attention of Wendy Tolleson and "**SHPD Library**" at the Kapolei SHPD office.

Please contact Wendy Tolleson at (808) 692-8024 if you have any questions or concerns regarding this letter.

Aloha,

A handwritten signature in cursive script that reads "Nancy A. McMahon". The signature is written in black ink and is positioned above the typed name and title.

Nancy A. McMahon (Deputy SHPO)
State Historic Preservation Officer

LINDA LINGLE
GOVERNOR OF HAWAII



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DEPARTMENT OF LAND AND NATURAL RESOURCES

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April 19, 2010

Dr. Hal Hammatt
Cultural Surveys Hawai'i
P. O. Box 1114
Kailua, Hawai'i 96736

LOG NO: 2010.1749
DOC NO: 1004MV01
Archaeology

Dear Dr. Hammatt:

**SUBJECT: Section 106 National Historic Preservation Act (NHPA) Review
Revised Draft Archaeological Inventory Survey For Construction Phase I of the
Honolulu High-Capacity Transit Corridor Project,
Hono'uli'uli, Hō'ae'ae, Waikele, Waipi'o, and Waiawa Ahupua'a, 'Ewa
District, O'ahu, Hawai'i
TMK: (1) 9-1, 9-4, 9-6, 9-7 (Various Plats and Parcels)**

Thank you for providing us the opportunity to review this Archaeological Inventory Survey (AIS), (Revised Draft *Archaeological Inventory Survey For Construction Phase I of the Honolulu High-Capacity Transit Corridor Project, Hono'uli'uli, Hō'ae'ae, Waikele, Waipi'o, and Waiawa Ahupua'a, 'Ewa District, O'ahu, Hawai'i TMK: (1) 9-1, 9-4, 9-6, 9-7 (Various Plats and Parcels)* [Hammatt, Ph.D, CSH, February 2010]).

The transit corridor, Phase 1 included 156 acres; the APE was 75 acres for direct surface disturbance. Field work was conducted for approximately 125 days. Field work was conducted from August 5 through October 14, 2009. A pedestrian survey was conducted for a 100% of the APE 7.4 miles corridor. The total length of the survey, 6.8 miles of Phase I and 0.6 miles of the western most Phase II (7.4 miles total) has been clarified and the distinction between backhoe trenches and column excavations has been made.

One historic site was identified 50-80-09-7751, a subsurface cultural deposit (lo'i sediments). This site dates from AD 990-1190. Site #7751 is significant under criteria D. In addition, we support the change in mitigating action for SIHP # 50-80-09-7751 from monitoring to data recovery, and we will look forward to the opportunity to review your investigation of the subsurface agricultural sediment.

We believe that the changes made to the document are sufficient. Please resubmit a copy of this report, marked "FINAL," along with a copy of this review letter and a text-searchable PDF version on CD to the attention of the "SHPD Library" at the Kapolei SHPD office.

Please contact Mike Vitousek at (808) 692-8015 if you have any questions or concerns regarding this letter.

Aloha,

A handwritten signature in cursive script that reads "Nancy A. McMahon".

Nancy A. McMahon (Deputy SHPO)
State Historic Preservation Officer

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
STATE HISTORIC PRESERVATION DIVISION
601 KAMOKILA BOULEVARD, ROOM 555
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WILLIAM J. AILA, JR.
CHAIRPERSON
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GUY KAULUKUKUI
FIRST DEPUTY

WILLIAM M. TAM
DEPUTY DIRECTOR - WATER

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KAHOOLAWEH ISLAND RESERVE COMMISSION
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November 29, 2011

Dr. Hallett Hammatt
Cultural Surveys Hawaii
P.O. Box 1114
Kailua, Hawaii 96734

LOG NO: 2011.0902
DOC NO: 1111MV19
Archaeology

Dear Dr. Hammatt

**SUBJECT: National Historic Preservation Act (NHPA) Section 106 Review –
Archaeological Data Recovery Plan for SIHP # 50-80-09-7751, Waipahu Transit Center
Station, Honolulu High Capacity Transit Corridor Project
Waikele Ahupua'a, 'Ewa District, Island of O'ahu
TMK: (1) 9-4-019:050 & :061**

Thank you for the opportunity to review this draft plan titled *Archaeological Data Recovery Plan for SIHP # 50-80-09-7751, Waipahu Transit Center Station, Honolulu High Capacity Transit Corridor Project Waikele Ahupua'a, 'Ewa District, Island of O'ahu TMK: (1) 9-4-019:050 & :061* (Constance O'Hare, Chris Monahan, and H. Hammatt March 2011). This draft was received by SHPD on March 30, 2011. We apologize for the delayed review, and thank you for your patience. SIHP # 50-80-09-7751 was discovered during the AIS of this project by Hammatt (2010). The effect determination for this site that resulted from the AIS was "effect with proposed mitigation commitments." If these mitigation commitments are in effect, this undertaking will have "no adverse effect" on this historic property. In this case, the mitigation commitments for this historic property are outlined in this Data Recovery Plan (DRP).

SIHP # 50-80-09-7751 is a subsurface pre-contact pond-field (lo'i) deposit. The research objectives outlined for this site aim to investigate the chronology of the initial construction of this site and its history of use. In addition this data recovery effort will attempt to research how this low energy alluvial deposit preserves the paleo-environmental record. We believe that these are very appropriate research questions for this site. We believe that the archeological methods that you have outlined, which includes the excavation of two linear test trenches, collection of 2 core samples, and the subsequent laboratory analysis, which will include radiocarbon dating of short lived charcoal species if available and palynological analysis will adequately address these research questions. We look forward to the opportunity to review a report that details the results of this data recovery effort. This document meets the minimum requirements for data recovery plans set forth in HAR §13-278, and is therefore accepted by the State Historic Preservation Division. Please send one hardcopy of the document, clearly marked **FINAL**, along with a copy of this review letter and a text-searchable PDF version on CD to the Kapolei SHPD office, attention SHPD Library.

Please contact Mike Vitousek at (808) 652-1510 or Michael.Vitousek@Hawaii.gov if you have any questions or concerns regarding this letter.

Aloha,

 Pua Aiu
 Administrator
 State Historic Preservation Division

NEIL ABERCROMBIE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

HISTORIC PRESERVATION DIVISION
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CHAIRPERSON
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ESTHER KIA'AINA
FIRST DEPUTY

WILLIAM M. TAM
DEPUTY DIRECTOR - WATER

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August 27, 2013

Mr. Matt McDermott, Principal Investigator
Cultural Surveys Hawai'i, Inc.
P.O. Box 1114
Kailua, Hawaii 96734

LOG NO: 2013.4528
DOC NO: 1308SL24
Archaeology

Dear Mr. McDermott:

**SUBJECT: Chapter 6E-8 and National Historic Preservation Act (NHPA) Section 106 Review –
End of Archaeological Data Recovery Fieldwork Letter for Archaeological Cultural
Resource SIHP 50-80-09-7751 within the Waipahu Transit Center Station, Honolulu High-
Capacity Transit Corridor Project
Waikele Ahupua'a, 'Ewa District, Island of O'ahu
TMK: (1) 9-4-019:050, 061 por.**

Thank you for the opportunity to review the report titled *End of Archaeological Data Recovery Fieldwork Letter for Archaeological Cultural Resource SIHP 50-80-09-7751 within the Waipahu Transit Center Station, Honolulu High-Capacity Transit Corridor Project Waikele Ahupua'a, 'Ewa District, Island of O'ahu TMK: (1) 9-4-019:050, 061 por.* (Sroat, McDermott, and Hammatt, July 2013). We received this submittal on July 25, 2013.

The project area consists of the Waipahu Transit Center Station situated within portions of TMK: (1) 9-4-019:050 and 061. The project acreage totals approximately 0.27 acres. It is located within Section 1 of the Honolulu High-Capacity Transit Corridor Project (HHCTCP). The HHCTCP 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 entire 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 (APE) for archaeology is defined in the PA as all areas of direct ground disturbance, including utilities. An archaeological inventory survey following HAR §13-276 was stipulated as a mitigation commitment in the PA.

The End of Fieldwork Letter report (EOF Letter) indicates SIHP 50-80-09-7751 is a subsurface pre-Contact ponded field or *lo'i* deposit identified within the *makai* (southern) portion of the proposed Waipahu Transit Center Station, just south of Farrington Highway. SIHP 7751 was the only historic property identified during the archaeological inventory survey (AIS) conducted for HHCTCP Section 1 (Hammatt 2010). The AIS report was reviewed and accepted by SHPD on April 19, 2010 (Log No. 2010.1749, Doc. No. 1004MV01). SHPD concurred with the evaluation of significance, project-specific effect recommendations, and proposed mitigation recommendations. SIHP 7751 was evaluated as significant under Criterion D of the National and Hawai'i Registers of Historic Places. Under Hawaii State historic preservation review legislation [HAR §13-275-7(2)], the effect recommendation was "effect, with proposed mitigation commitments," and under federal historic preservation review legislation (36 CFR 800.5), it was "no adverse effect" with the understanding that proposed data recovery would mitigate the undertaking's potential effect to National register-eligible cultural resources.

Mr. McDermott
August 27, 2013
Page 2

The data recovery plan (DRP) prepared for SIHP 7751 (O'Hare et al., March 2011) was reviewed and accepted by SHPD on November 29, 2011 (Log No. 2011.0902, Doc. No. 1111MV19). The research objectives specified in the DRP centered on investigating the chronology of the initial construction of the site, its history of use, and examining the paleo-environmental record associated with this low-energy alluvial deposit and surrounding area. The planned research methods specified excavation of two 10-meter long test trenches; collection of one 5-liter bulk sample, one column sample, and one core sample from each trench; laboratory analysis of any artifacts and faunal remains encountered; and specialized analyses involving wood taxa identification, radiocarbon dating, sediment textural analysis and palynology, including micro charcoal particle quantification.

Data recovery fieldwork was conducted by Cultural Surveys Hawai'i, Inc., on April 29 and 30, 2013, in accordance with the DRP accepted by SHPD on November 29, 2011 (Log No. 2011.0902, Doc. No. 1111MV19). The completed fieldwork involved excavation of two ten-meter long trenches (DR1 and DR2), collection of six bulk samples of pondfield/wetland sediments from DR1 and four from DR2; two column samples from DR1 and one from DR2; and two core samples each from both trenches. As specified in the DRP, the EOF Letter report indicates that pollen studies, wood taxa speciation, radiocarbon dating, and palynology, including micro charcoal particle quantification will be conducted. The EOF Letter also indicates no additional historic properties were identified, and no discrete features such as pondfield berms or 'auwai were identified during the data recovery investigations.

The EOF Letter adequately describes the data recovery project, including a summary of the plan specifications, investigation methods and procedures, preliminary field results, and the proposed laboratory analyses. This End of Archaeological Data Recovery Fieldwork Letter report meets the minimum requirements specified in the *Secretary of the Interior's Standards for Archeological Documentation* and the requirements set forth in HAR §13-275-9(d)(1). It is accepted by SHPD with the understanding that construction may not proceed until detailed mitigation plans or interim measures to address all of the sites in the entire corridor are received. In accordance with HAR §13-275-9(d)(2), a data recovery report meeting the requirements set forth in HAR §13-278-4 shall be submitted to SHPD for review and approval.

Please send one hardcopy of this End-of Fieldwork Letter, clearly marked FINAL, along with a copy of this review letter and a text-searchable PDF version on CD to the Kapolei SHPD office. Please contact 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

LINDA LINGLE
GOVERNOR OF HAWAII



LAURA H. THIELEN
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
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STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION
601 KAMOKILA BOULEVARD, ROOM 555
KAPOLEI, HAWAII 96707

May 7, 2010

Mr. Matt McDermott
Cultural Surveys Hawai'i
P. O. Box 1114
Kailua, Hawai'i 96736

LOG NO: 2010.1748
DOC NO: 1005NM14
Archaeology

Dear Mr. McDermott:

**SUBJECT: Section 106 National Historic Preservation Act (NHPA) Review
Archaeological Inventory Survey Plan--
For Construction Phase II of the Honolulu High-Capacity Transit Corridor Project,
Waiawa, Manana, Waimano, Waiau, Waimalu, Kalauao, 'Aiea and Halawa
Ahupua'a, 'Ewa District, O'ahu, Hawai'i
TMK: (1) 9-7, 9-8, 9-9 (Various Plats and Parcels)**

Thank you for providing us the opportunity to review this Archaeological Inventory Survey Plan (AISP), (*Archaeological Inventory Survey Plan For Construction Phase II of the Honolulu High-Capacity Transit Corridor Project, Waiawa, Manana, Waimano, Waiau, Waimalu, Kalauao, 'Aiea and Halawa Ahupua'a, 'Ewa District, O'ahu, Hawai'i TMK: (1) 9-7, 9-8, 9-9 (Various Plats and Parcels)[Hammatt and Shideler MA, March 2009]*) which we received on April 7, 2010.

The transit corridor is a very complex project which includes stations, park-and-ride facilities, and piers and requires flexibility on the part of archaeological contractors in inventorying historic properties. Due to geography, urban settlement, previous archaeological work, or the lack thereof, and the non-sensitive and sensitive archaeological areas, the approach was to split the project area in construction phases. All aspects of the archaeological inventory survey were developed around these distinct loci.

Archaeological survey techniques to be employed are driven by the necessity to determine historic properties subsurface in areas of sensitivity. Additionally, these techniques will also confirm the lack of properties in areas not sensitive. These techniques include test trenching, Ground Penetrating Radar (GPR) and limited areal excavations. We agree that these methods will adequately document historic properties that, if significant and with further consultation with this office, be investigated in a mitigation phase.

At the Oahu Island Burial Council Meeting on May 13, 2010, the AISP was presented and no specific comments or revisions were made. The OIBC did suggest that some literature on the chants be included in the background section of the final report.

This AISP is accepted and meets the minimum standards for compliance under Hawai'i administrative Rules.

We are in receipt of a hardcopy of this document, which we will mark as FINAL. Please send text-searchable PDF version on CD along with a copy of this review letter to the attention of Wendy Tolleson and "SHPD Library" at the Kapolei SHPD office.

Please contact me at (808) 692-8015 if you have any questions or concerns regarding this letter.

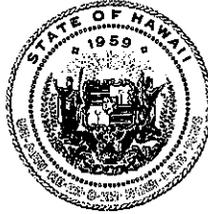
Matt McDermott
Page 2

Aloha,

A handwritten signature in cursive script that reads "Nancy A. McMahon". The signature is written in black ink and is positioned above the typed name.

Nancy A. McMahon (Deputy SHPO)
State Historic Preservation Officer

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.
INTERIM CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

GUY H. KAULUKUKUI
ACTING FIRST DEPUTY

WILLIAM M. TAM
ACTING DEPUTY DIRECTOR - WATER

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May 23, 2012

Hallett H. Hammatt, Ph.D.
Cultural Surveys Hawai'i, Inc.
P.O. Box 1114
Kailua, Hawaii 96734

LOG NO: 2012.1449
DOC NO: 1205NN23

Dear Dr. Hammatt:

Subject: **National Historic Preservation Act (NHPA) Section 106 Consultation -
Revised Archaeological Inventory Survey Report for Construction Phase 2
Honolulu High-Capacity Transit Corridor Project
Waiawa, Mānana, Waimano, Waiau, Waimalu, Kalauao, 'Aiea, & Hālawā Ahupua'a,
'Ewa District, Island of O'ahu
TMK: (1) 9-7, 9-8, 9-9 Various Plats and Parcels**

Thank you for the opportunity to review this report titled *Archaeological Inventory Survey for Construction Phase 2 of the Honolulu High-Capacity Transit Corridor Project, Waiawa, Mānana, Waimano, Waiau, Waimalu, Kalauao, 'Aiea and Hālawā Ahupua'a, 'Ewa District, Island of O'ahu, TMK: (1) 9-7, 9-8, 9-9 Various Plats and Parcels*, Sroat, Thurman, and McDermott (April 2012), which our office received on September 9, 2012. This report was prepared for Parsons Brinckerhoff, Inc. on behalf of the City and County of Honolulu and the Federal Transit Administration. We have previously provided comments on the archaeological inventory survey plan (Log 2010.1748, Doc 1005NM14), draft archaeological inventory survey (Log 2012.0966, Doc 1205NN02) and the archaeological monitoring plan for this project (Log 2012.1041, 1205NN12). Revisions requested in our prior review of the draft inventory survey have been addressed in this revised report, as indicated below (in summary):

1. The test trench stratigraphy descriptions for Trenches E7, E13, E16, and PRS1 have been expanded to clarify the distinctions made between fill layers, culturally sterile natural layers and possible lo'i or fishpond deposits. In addition, difference between overlying fill layers and underlying natural strata was made.
2. Three test trenches were initially proposed for the *mauka* portion of the Pearlridge Transit Station (TMK [1] 9-8-010:002), but land access onto the property was not permitted. According to the revised AIS report, the City and County of Honolulu obtained ownership of this parcel from 50th State Properties, and Cultural Surveys Hawaii can now complete its three test trenches as part of a supplemental archaeological inventory survey. The supplemental archaeological inventory survey will be conducted prior to the beginning of construction activities. The results of the supplemental archaeological inventory survey will be reported in a supplemental archaeological inventory survey addendum to this approved archaeological inventory survey report.
3. Lastly, provisions of the archaeological monitoring program has been removed from the revised AIS report and was included an archaeological monitoring plan, which has been approved.

As indicated in our prior letter, one newly identified historic property (SIHP Site 50-80-09-7150) was identified within Trench E-7, located along Kamehameha Highway, midway between Kuleana Road and Ka'ahumanu Street. This location is in a documented area of former ponded taro fields (LCA#9385). We concur that this site is significant under National Register of Historic Places and Hawaii Register of Historic Places Criterion D, and has the potential to yield information important for understanding prehistory. We concur with the proposed mitigation measures, which is on-site monitoring of any land alteration activities in the vicinity of the site area.

This revised report meets the requirements of HAR 13-276 and *The Secretary of Interior's Standards for Identification and Evaluation*, and 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 on CD to the Kapolei SHPD office. Please contact Deona Naboia at (808) 692-8015 or Deona.Naboia@Hawaii.gov if you have any questions or concerns regarding this letter.

Aloha,

A handwritten signature in black ink, appearing to read 'Theresa K. Donham', followed by a long horizontal line extending to the right.

Theresa K. Donham
Archaeology Branch Chief

NEIL ABERCROMBIE
GOVERNOR OF HAWAII



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August 27, 2013

Matt McDermott
Principal Investigator
Cultural Surveys Hawaii
P.O. Box 1114
Kailua, HI 96734

Log No. 2013.4527
Doc. No. 1308SL22

Dear Mr. McDermott:

**Subject: Chapter 6E-8 and National Historic Preservation Act (NHPA) Section 106 Review—
Supplemental Archaeological Inventory Survey for Phase 2 of the Honolulu High-Capacity
Transit Corridor Project, Proposed Pearlridge Station
Waimalu Ahupua'a, 'Ewa District, Island of O'ahu
TMK: (1) 9-8-009:017 and 9-8-010:002**

Thank you for the opportunity to review this report titled *Supplemental Archaeological Inventory Survey for Section 2 of the Honolulu High-Capacity Transit Corridor Project, Proposed Pearlridge Station, Waimalu Ahupua'a, 'Ewa District, Island of O'ahu*. TMK: (1) 9-8-009:017 and (1) 9-8-010:002 (Sroat, Matsushima & McDermott, August 2013), which our office received on July 25, 2013.

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 as a whole was determined to have an adverse effect on historic properties. A Programmatic Agreement (PA) was executed on January 18, 2011 between the Federal Transit Administration (FTA), the Hawaii State Historic Preservation Officer (SHPO), the US Navy and the Advisory Council on Historic Preservation as signatories and the City and County of Honolulu as an invited Signatory. An archaeological inventory survey for the four phases of the project under HAR chapter 276 is stipulated as a mitigation measure in the PA.

The Area of Potential Effect (APE) for archaeology is defined in the PA as all areas of direct ground disturbance. Thus, for the Supplemental AIS for Phase 2 the area of direct ground disturbance is approximately .2 acres, which is the area of the Pearlridge Station. An archaeological inventory survey plan (AISP) for Phase 2 was prepared by Cultural Surveys Hawaii, Inc. (Hammatt 2010b). The AISP was reviewed and accepted by SHPD on May 7, 2010 (Log No. 2010.1748, Doc. No. 1005NM14). The three test trenches in this supplemental AIS were included in the original AISP, but could not be done at the time because the landowner would not allow access. We confirm that the supplemental archaeological inventory survey was conducted in accordance with the Phase 2 AISP.

Three test trenches were excavated to provide more information on the subsurface nature of the Pearlridge Station, to identify and document any archaeological historic resources encountered and to make eligibility recommendations for the Hawaii and National Registers of Historic Places. No historic resources were found during this supplemental archaeological inventory survey. However, 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. SHPD concurs with the proposed mitigation of a combination of on-call and full-time on-site archaeological monitoring as previously agreed to in the SHPD's acceptance of the AIS for Phase 2 (Log No. 2010.1749, Doc. No. 1004MV01).

Mr. McDermott
August 27, 2013
Page 2

The 30 day comment period for the project started on July 25, 2013 and ended on August 26, 2013. SHPD received no comments.

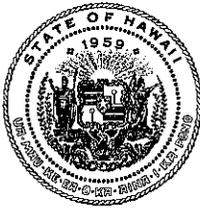
This revised archaeological inventory survey report meets the minimum requirements specified in the *Secretary of the Interior's Standards for Archeological Documentation* and the requirements set forth in HAR §13-275 and HAR §13-276. It is accepted by SHPD. Please send one hardcopy of the document, 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

NEIL ABERCROMBIE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621
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WILLIAM J. AILA, JR.
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May 16, 2012

Hallett H. Hammatt, Ph.D.
Cultural Surveys Hawai'i, Inc.
P.O. Box 1114
Kailua, Hawaii 96734

LOG NO: 2012.1041
DOC NO: 1205NN12

Dear Dr. Hammatt:

Subject: **National Historic Preservation Act (NHPA) Section 106 Review -
Archaeological Monitoring Plan for
Construction Phase 2 Honolulu High-Capacity Transit Corridor Project
Waiawa, Mānana, Waimano, Waiau, Waimalu, Kalauao, 'Aiea, & Hālawā Ahupua'a,
'Ewa District, Island of O'ahu
TMK: (1) 9-7, 9-8, 9-9 Various Plats and Parcels**

Thank you for the opportunity to review this plan titled *Archaeological Monitoring Plan for Construction Phase 2 of the Honolulu High-Capacity Transit Corridor Project, Waiawa, Mānana, Waimano, Waiau, Waimalu, Kalauao, 'Aiea and Hālawā Ahupua'a, 'Ewa District, Island of O'ahu TMK: (1) 9-7, 9-8, 9-9 Various Plats and Parcels*, Sroat, and McDermott (April 2012), which our office received on April 13, 2012. This report was prepared for Parsons Brinckerhoff, Inc. on behalf of the City and County of Honolulu and the Federal Transit Administration.

We have previously approved the archaeological inventory survey plan (Log 2010.1748, Doc 1005NM14), and provided comments on the draft archaeological inventory survey report for this project area (Log 2012.0966, Doc 1205NN02). We concur with the recommendation that archaeological monitoring is appropriate for culturally sensitive areas along the route of this proposed project.

The monitoring plan indicates that the project has the potential to encounter archaeological resources including remnants of the once extensive pre-Contact and historic pondfield (*lo'i*) agricultural system that was once extant though portions of the project area. There is one previously documented historic property within the project area (SIHP Site 50-80-09-7150). The archaeological monitoring program will provide an opportunity to study and record, collect samples and perform detailed sample analysis that may refine characteristics, function, age of use and geographic extent of this site.

On-site archaeological monitoring is proposed for four sensitive areas located in the vicinity of documented cemeteries and Site 50-80-09-7150. These four areas are:

- 1) An area in the vicinity of Loch View B Cemetery and extending westwards in the vicinity of previously documented "Cemetery."
- 2) A portion of the area between Kuleana Road and Kaāhumanu Street, surrounding the location of Site 50-80-09-7150.
- 3) The entire area between Kanuku Street and Kahale Street, including all construction related to Pearl Ridge Station and encompassing both sides of Kalauao Stream.

- 4) From the location of Dixie Grill to just past the Moanalua Freeway overpass encompassing numerous LCAs and the area of previously removed *ma kai* section of the 'Aiea Cemetery.

On-call archaeological monitoring with weekly spot checks is recommended for the remaining sections of the Construction Phase 2 project area. Based on discoveries or observations, areas of on-call monitoring can become onsite monitoring areas as appropriate. Changes from this combination monitoring program will only be made following consultation with and concurrence from SHPD.

The procedures outlined in the plan meet the standards set forth in Hawaii Administrative Rule §13-279-4, and the *Secretary of Interior's Standards for Archaeological Documentation*; 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 on CD to the Kapolei SHPD office, attention SHPD Library. Please contact Nona Naboia at Deona.Noba@hawaii.gov if you have any questions regarding this letter.

Aloha,



Theresa K. Donham
Archaeology Branch Chief and
Deputy State Historic Preservation Officer

NEIL ABERCROMBIE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
STATE HISTORIC PRESERVATION DIVISION
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KAHOOLAWE ISLAND RESERVE COMMISSION
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December 2, 2011

Dr. Hallett Hammatt
Cultural Surveys Hawaii
P.O. Box 1114
Kailua, Hawaii 96734

LOG NO: 2011.2167
DOC NO: 1211NN01
Archaeology

Dear Dr. Hammatt

**SUBJECT: National Historic Preservation Act (NHPA) Section 106 Review –
Archaeological Inventory Survey Plan for the Airport (Phase 3) Construction of the
Honolulu High Capacity Transit Corridor Project (HHCTCP)
Hālawā and Moanalua Ahupua‘a, ‘Ewa and Honolulu District, Island of O‘ahu
TMK Sections: (1) 1-1 and 9-9**

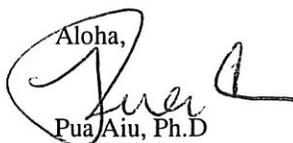
Thank you for the opportunity to review this draft plan titled *Draft Archaeological Inventory Survey Plan for the Airport (Phase 3) Construction of the Honolulu High Capacity Transit Corridor Project Hālawā and Moanalua Ahupua‘a, ‘Ewa and Honolulu District, Island of O‘ahu* (Hallett Hammatt, and David Shideler August 2011). This draft was received by SHPD on August 8, 2011. We apologize for the delayed review, and thank you for your patience. This AISP was prepared in compliance with National Historic Preservation Act Section 106 (36CFR800).

The study area for this AISP extends from Kamehameha Hwy at Kaloloa Drive (just northwest of Hālawā Stream) in the west to Kamehameha Hwy. at Middle Street (just west of Kalihi Stream) in the east. According to the HHCTCP Programmatic Agreement (Stipulation II.A.1) the area of potential effect (APE) includes all areas of direct ground disturbance, which is estimated to be 13.87 acres.

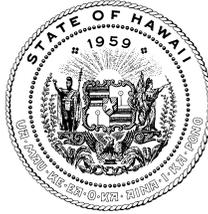
The background section acceptably establishes the ahupua‘a settlement pattern and predicts the likely site pattern in the project area. The historical information provided summarizes the history of the post-contact period land uses. The summary of previous archaeological work in the area provides a baseline for the current work. We believe that the field methods that you have described in section 7.0 will adequately identify the historic resources of this project area.

A total of forty test trenches are proposed within the 9.06 acres project footprint: twenty-four within the footprint of the proposed column foundations that spread throughout the project area, fifteen within the footprints of the three transit stations (Pearl Harbor Naval Base Station; Honolulu International Airport Station; and Lagoon Drive Station) and a single trench in the area of utility relocation within the vicinity of the Pearl Harbor Naval Base Station.

This plan meets the standards for Archaeological Inventory Survey Plans that are set forth in HAR 13-284-5 (c). Please send one hardcopy of the document, clearly marked **FINAL**, along with a copy of this review letter and a text-searchable PDF version on CD to the Kapolei SHPD office, attention SHPD Library. Please contact Deona Naboia at Deona.Naboia@hawaii.gov if you have any questions or concerns regarding this letter.

Aloha,

Pua Aiu, Ph.D
Administrator
State Historic Preservation Division

NEIL ABERCROMBIE
GOVERNOR OF HAWAII



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**HISTORIC PRESERVATION DIVISION
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601 Kamokila Boulevard, Suite 555
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March 1, 2013

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

LOG NO: 2013.1957
DOC NO: 1302SL29
Archaeology

Dear Mr. McDermott:

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

Thank you for the opportunity to review this revised report titled *Addendum to an Archaeological Inventory Survey Plan for the Airport (Phase 3) Construction of the Honolulu High-Capacity Transit Corridor Project Hālawa and Moanalua Ahupua'a, 'Ewa and Honolulu District, O'ahu Island TMK Sections (1) 1-1 and 9-9* (Hammatt and Shideler, February 2013). Our Kapolei office received this submittal on February 20, 2013.

The study area for this AISP Addendum extends from Kamehameha Highway at Kaloloa Drive (just northwest of Hālawa Stream) in the west to Kamehameha Highway at Middle Street (just west of Kalihi Stream) in the east. The AISP Addendum study area differs from the study area defined in the AISP approved for the Airport (Phase 3) HART Corridor project (December 2, 2011; Log No. 2011.2167, Doc. No. 1211NN01). The AISP Addendum involves re-location of the airport footprint about 60 m south of the original footprint and re-location of the corridor on either side and through the new airport footprint.

The revisions made to this document adequately address most of the concerns raised in our prior correspondence (January 31, 2013; Log No. 2012.3655, Doc. No. 1301SL36). This archaeological inventory survey plan meets the requirements of Hawaii Administrative Rule (HAR) §13-284-5. 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 on CD to the Kapolei SHPD office, attention SHPD Library.

Please contact Susan A. Lebo at (808) 692-8019 or at Susan.A.Lebo@hawaii.gov if you have any questions regarding this letter.

Aloha,

A handwritten signature in black ink, appearing to read 'Theresa K. Donham'.

Theresa K. Donham
Deputy State Historic Preservation Officer

cc: Paul Cleghorn, Kako'o, cleghorn@pacificlegacy.com

NEIL ABERCROMBIE
GOVERNOR OF HAWAII



STATE OF HAWAII
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WILLIAM M. TAM
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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 Halawa 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

Mr. McDermott
August 26, 2013
Page 2

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 Hawaii 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 §13-275 and 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

NEIL ABERCROMBIE
GOVERNOR OF HAWAII



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DEPARTMENT OF LAND AND NATURAL RESOURCES

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October 25, 2011

Hallett H. Hammatt, Ph.D
P.O. Box 1114
Kailua, Hawaii 96734

LOG NO: 2011.2379
DOC NO: 1110NN08

Dear Dr. Hammatt:

**SUBJECT: National Historic Preservation Act (NHPA) Section 106 Review –
(REVISED) Archaeological Inventory Survey Plan for
City Center PHASE 4 of the Honolulu High-Capacity Transit Corridor Project
Kalihi, Kapālama, and Honolulu Ahupua`a, Honolulu District, Island of O`ahu
TMK: (3) 7-4-021: 002**

Thank you for requesting our review of the (Revised) Archeological Inventory Survey Plan (AISP) titled *Archaeological Inventory Survey Plan for the City Center (Construction Phase 4) of the Honolulu High-Capacity Transit Corridor Project, Kalihi, Kapālama, and Honolulu Ahupua`a, Honolulu District, Island of O`ahu TMK: [1] 1-2, 1-5, 1-7, 2-1, 2-3 (Various Plats and Parcels) Volume I: Plan and Appendices F and G and Volume II: Appendices A-E, Land Documents* by Hammatt, et.al (CSH report code KALIHI 17), received by our office on August 12, 2011. This AISP was prepared in compliance with National Historic Preservation Act Section 106 Review.

The AISP explains the intent to identify and record any remaining historic sites and cultural deposits located within the 13.87 acre project corridor that extends east along the southern coast of O`ahu from Kalihi Stream on Dillingham Boulevard to Ala Moana Center on Kona Street. Project construction will require relocation of existing utility lines within the project corridor that conflict with the proposed Honolulu High-Capacity Transit Corridor Project. Amongst other land disturbing activities including grading of facility locations, and excavations for the guide way column foundations, relocating utilities will cause the most disturbances.

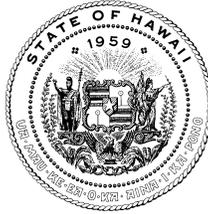
This plan meets the standards for Archaeological Inventory Survey Plans that are set forth in HAR 13-284-5 (c). Please send one hardcopy of the document, clearly marked **FINAL**, along with a copy of this review letter and a text-searchable PDF version on CD to the Kapolei SHPD office, attention SHPD Library. Please contact Deona Naboia at Deona.Naboia@Hawaii.gov if you have any questions or concerns regarding this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Pua Aiu".

Pua Aiu, PhD
Administrator
Historic Preservation Division

NEIL ABERCROMBIE
GOVERNOR OF HAWAII



WILLIAM J. AILA, JR.
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
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**HISTORIC PRESERVATION DIVISION
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601 Kamokila Boulevard, Suite 555
Kapolei, HI 96806

March 1, 2013

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

LOG NO: 2013.1958
DOC NO: 1302SL28
Archaeology

Dear Mr. McDermott:

**SUBJECT: Chapter 6E-8 and National Historic Preservation Act (NHPA) Section 106 Review –
Addendum to an Archaeological Inventory Survey Plan for the City
Center (Phase 4) of the Honolulu High-Capacity Transit Corridor Project
Kalihi, Kapālama, and Honolulu Ahupua‘a, Honolulu District, Island of O‘ahu
TMK Sections (1) 2-1, 2-3 (various)**

Thank you for the opportunity to review this revised report titled *Addendum to an Archaeological Inventory Survey Plan for the City Center (Phase 4) of the Honolulu High-Capacity Transit Corridor Project Kalihi, Kapālama, and Honolulu Ahupua‘a, Honolulu District, Island of O‘ahu TMK: (1) 2-1, 2-3 (Various Plats and Parcels) Addressing Changes from the Vicinity of Ward Avenue and Halekauwila Street to the Vicinity of Queen and Kamakee Streets* (Hammatt et al., February 2013). Our Kapolei office received this submittal on February 20, 2013.

The entire study area for the Honolulu High-Capacity Transit Corridor Project (HHCTCP) extends about 23 miles from Kapolei in the west to Ala Moana Center in the east. The City Center (Phase 4) study area represents the eastern 4.3 mile terminus of the HHCTCP. The AISP Addendum study area differs from the study area defined in the City Center (Phase 4) AISP approved by SHPD on October 25, 2011 (Log No. 2011.2379, Doc. No. 1110NN08). The AISP Addendum involves re-location of the City Center's Kaka'ako Station footprint and corridor beginning about 30 m 'Ewa (northwest) of Ward Avenue and rejoining the original alignment in the middle of Queen Street about 100 m Diamond Head (southeast) of Kamake'e Street.

The revisions made to this document adequately address the concerns raised in our prior correspondence (January 31, 2013; Log No. 2012.3654, Doc. No. 1301SL34). This archaeological inventory survey plan meets all of the requirements of Hawaii Administrative Rule (HAR) §13-284-5. 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 on CD to the Kapolei SHPD office, attention SHPD Library.

Please contact Susan A. Lebo at (808) 692-8019 or at Susan.A.Lebo@hawaii.gov if you have any questions regarding this letter.

Aloha,

A handwritten signature in black ink, appearing to read 'Theresa K. Donham'.

Theresa K. Donham
Deputy State Historic Preservation Officer

cc: Paul Cleghorn, Kako‘o, cleghorn@pacificlegacy.com

NEIL ABERCROMBIE
GOVERNOR OF HAWAII



STATE OF HAWAII
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STATE PARKS

August 26, 2013

Mr. Matt McDermott
Principle Investigator
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LOG NO: 2013.2564, 2013.4338
DOC NO: 1308SL21
Archaeology

Dear Mr. McDermott:

**SUBJECT: Chapter 6E-8 and National Historic Preservation Act (NHPA) Section 106 Review—
Revised Archaeological Inventory Survey Report for City Center (Construction Phase 4)
Honolulu High-Capacity Transit Corridor Project
Kalihi, Kapālama, and Honolulu Ahupua'a,
Honolulu District, Island of O'ahu
TMK: (1) 1-2, 1-5, 1-7, 2-1, 2-3, Various Plats and Parcels**

Thank you for the opportunity to review this report titled *Archaeological Inventory Survey Report (AISR) for Construction Phase 4 of the Honolulu High-Capacity Transit Corridor Project, Kalihi, Kapālama, and Honolulu Ahupua'a, Honolulu District, O'ahu Island TMK Sections [1] 1-2, 1-5, 1-7, 2-1, 2-3 (Various Plats and Parcels)* (Hammatt et al., June 2013), which our office received on July 15, 2013. We received the initial draft on April 9, 2013. Due to the size and complexity of this review all comments have been provided directly on text pages of the report as well as through in-person reviews of specific areas with Cultural Surveys Hawaii staff.

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 within the transit corridor and a Programmatic Agreement (PA) was executed on January 18, 2011 between the Federal Transit Administration (FTA), the Hawaii State Historic Preservation Officer (SHPO), the US Navy and the Advisory Council on Historic Preservation as signatories and the City and County of Honolulu as an invited Signatory. An archaeological inventory survey for the four phases of the project under HAR §13-276 is stipulated as a mitigation measure in the PA.

The Area of Potential Effect (APE) for archaeology is defined in the PA as all areas of direct ground disturbance. Thus, for the City Center the area of direct ground disturbance is approximately 13.9 acres, including nine (9) stations. The survey study area is the eastern-most 4.3 miles (6.9 km) of the overall HHCTCP area, extending from Kalihi Stream/Middle Street Station in the west to Ala Moana Center in the east. An archaeological inventory survey plan (AISP) was prepared by Cultural Surveys Hawai'i, Inc. (Hammatt et al. 2011). The AISP was reviewed and accepted by SHPD on October 25, 2011 (Log No. 2011.2379, Doc. No. 1110NN08). An Addendum AISP was completed to address the relocation of the City Center's Kaka'ako Station footprint and corridor beginning about 30 meters 'Ewa (northwest) of Ward Avenue and rejoining the original alignment in the middle of Queen Street about 100 meters Diamond Head (southeast) of Kamake'e Street. The Addendum AISP was accepted by SHPD on March 1, 2013 (Log No. 2013.1958, Doc. No. 1302SL28).

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 250 test trench excavations. Two-hundred and thirty-two (232) trenches were proposed in the AISP, nine (9) were abandoned due to utility conflicts, safety issues or realignment/redesign, and twenty-seven (27) trenches were added to replace abandoned trenches or at the request of SHPD. The additional trenches were included to ensure that entire column locations were tested, alternative column or utility locations were tested, or to ensure the extent of sand deposits and the absence of burials in those sand deposits. The proposed and final locations of some of the trenches differ slightly, reflecting changes required to address impediments (e.g. utility line locations) and/or safety issues.

Nineteen (19) historic resources were identified within, or immediately adjacent to the Construction Phase 4 AIS survey area. Twelve (12) of these resources were previously identified and documented. Seven (7) resources were newly identified in this survey. All 19 historic resources have been assigned Hawai'i State Inventory of Historic Properties (SIHP) numbers, all with the prefix 50-80-14. The historic resources, associated test excavation numbers, descriptions, Hawai'i and/or National Register-eligibility, and mitigation recommendations are listed in the table below. Bold SIHP numbers represent the seven (7) historic properties newly identified during the Construction Phase 4 AIS. Numbers not in bold represent the twelve (12) historic properties in the Rail Corridor found during previous studies.

SIHP#	Construction Phase 4 Test Excavation #	Description/Formal Type	Significance/Eligibility		Mitigation
			HAR §13-276-6 Criterion	National Register	
50-80-14-7425	T-020	Subsurface <i>imu</i> (earth oven) feature	Recommend: D	Recommend: D	Monitoring
50-80-14-7426	T-054 through T-082, and 085	Subsurface wetland deposit	Recommend: D	Recommend: D	Monitoring
50-80-14-7506	T-064, T-066 and T-067	Subsurface incinerated trash deposit	Recommend: D	Recommend: D	Monitoring
50-80-14-5368	T-088, 091, 092, 093, and 094	Subsurface remnants of Kūwili Fishpond	Recommend: D	Recommend: D	Monitoring
50-80-14-5966	T-095	Subsurface remnants of Kawa Fishpond	Recommend: D	Recommend: D	Data Recovery, Monitoring
50-80-14-7427	T-096 through T-101 and test bores C-1-C-6	Subsurface historic building foundations and walls and underlying culturally enriched sediments, also one human talus bone in a fill deposit	Recommend: D, E	Recommend: D	Monitoring, Data Recovery, and Burial Treatment Plan
50-80-14-7428	T-119, 119A, 120, 120A, 120B	Subsurface culturally-enriched sand A-horizon (T-120, T-120A, and T-120B) and historic warehouse foundation (T-119 and T-119A)	Recommend: D	Recommend: D	Data Recovery and monitoring of sand A-horizon (T-120, 120A, and 120B), monitoring for historic foundation (T-119 and 119A)
50-80-14-2963	T-122, 123, and 124	Subsurface pond sediments containing historic artifacts, culturally-enriched sand A-horizon, also includes 7 human burials as described in the adjacent Makai Parking Garage monitoring report.	Recommend: D, E	Recommend: D	Monitoring for pond sediments, data recovery and monitoring for culturally-enriched sand A-horizon
50-80-14-7124	T-132	Subsurface historic building remnants	Previous: A, D Recommend: D	Recommend: D	Monitoring
50-80-14-7189	T-130, 132, 134, 138, 140, 231A, 232, and 232A	Subsurface fill layer containing burnt historic trash from open burning	Previous: A, D Recommend: D	Recommend: D	Monitoring

SIHP#	Construction Phase 4 Test Excavation #	Description/Formal Type	Significance/Eligibility		Mitigation
			HAR §13-276-6 Criterion	National Register	
50-80-14-7190	T-229 and 230	Subsurface salt pan remnants	Previous: A, D Recommend: D	Recommend: D	Data Recovery, Monitoring
50-80-14-7197	Not observed (see mitigation)	Subsurface culturally-enriched sand A-horizon	Previous: A, D and D Recommend: D	Recommend: D	Monitoring; Not observed in current AIS (see mitigation), but potentially affected by project construction due to close proximity
50-80-14-5820	T-141, 142, 145, 146A, 150, 151, 151A	Human skeletal remains/burials and subsurface culturally enriched sand A-horizon	Recommend: D, E	Recommend: D	Data Recovery, Monitoring, Burial Treatment Plan
50-80-14-7429	T-167, 168, 168A, 168B, 169, 170, and 170A	Subsurface culturally-enriched sand A-horizon and human cranial Fragment in T-170	Recommend: D, E	Recommend: D	Data Recovery, Monitoring, Burial Treatment Plan
50-80-14-6856	T-181-185	Subsurface remnants of Kolowalu Fishpond	Recommend: D	Recommend: D	Monitoring
50-80-14-6636	T-186-193, 195, 196, 198-200, 202, 202A, 203, 205, 207, 208, 210-212, 214, 219, and 220	Subsurface remnants of the former Kewalo wetland	Previous: A, D Recommend: D	Recommend: D	Monitoring
50-80-14-7430	T-202	Subsurface remnant of a historic privy	Recommend: D	Recommend: D	Monitoring
50-80-14-7193	T-214	Subsurface historic refuse-enriched fill deposit	Ineligible	Ineligible	NA
50-80-14-2918	T-226A, B, C, and D, T-227 and 227A	Subsurface culturally-enriched sand A-horizon with human skeletal remains/burials, also includes iron historic trolley or cart tracks	Recommend: D, E	Recommend: D	Data Recovery, Monitoring, Burial Treatment Plan

We concur with the eligibility recommendations of the 19 sites in the above table, including the ineligible SIHP# 50-80-14-7193 determination. The 18 remaining sites are significant under National Register of Historic Places and Hawaii Register of Historic Places recommended criteria listed in the table. The overall effect of the undertaking has been previously determined to be "adverse" under 36 CFR part 800, as discussed above. The project effect under the provisions of HAR §13-275-7(2) is determined to be "effect with proposed mitigation." We concur with the proposed mitigation measures, which include on-site archaeological monitoring of any land alteration activities in the vicinity of the site areas and data recovery and burial treatment as identified above.

We confirm that the archaeological inventory survey was conducted in accordance with the AISP and Addendum AISP. As mentioned above, all comments to this AIS were done directly on the report and in face-to-face meetings with staff from Cultural Surveys Hawai'i, Inc.

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In addition, SHPD received comments from 13 individuals and organizations with a total of 98 comments related to Archaeological Inventory Survey for the entire Rail Corridor. Fifty-seven comments (57) were specific to the City Center portion of the project. Forty-nine (49) of those comments requested additional testing related to column locations, utilities, the limited nature of geotechnical core testing or testing that had been stopped due to water inundation. SHPD has considered all comments received and believes that an adequate inventory survey has been completed. Data recovery will be conducted on eight historic sites as mitigation. SHPD notes that burials found during data recovery are considered previously identified and the decision to preserve them in place or relocate them will be the purview of the O'ahu Island Burial Council. HART has agreed that no construction will take place within 25 feet of any burials prior to SHPD's acceptance of a burial treatment plan.

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 §13-275 and 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