February 21, 2014

Mr. Matt McDermott
Cultural Surveys Hawai‘i, Inc.
P.O. Box 1114
Kailua, HI 96734

Dear Mr. McDermott:

SUBJECT: Chapter 6E-8 and National Historic Preservation Act (NHPA) Section 106 Review—Archaeological Monitoring Plan for the Airport Section (Section 3) of the Honolulu High-Capacity Transit Corridor Project
Hālawa and Moanalua Ahupua’a, ‘Ewa and Honolulu District, O‘ahu Island
TMK: (1) 1-1 and 9-9 various

Thank you for the opportunity to review this draft report titled Archaeological Monitoring Plan for the Airport Section (Section 3) of the Honolulu High-Capacity Transit Corridor Project, Hālawa and Moanalua Ahupua’a, Ewa and Honolulu Districts, O‘ahu TMK Sections [1] 1-1 and 9-9 (Various Plats and Parcels) (Hammatt, February 2014). We received this submittal on February 12, 2014. An archaeological inventory survey (AIS) plan (Hammatt and Shideler 2011) was reviewed and accepted by SHPD on December 2, 2011 (Log No. 2011.2167, Doc. No. 1211NN01). An Addendum AISP (Hammatt and Shideler 2013) was reviewed and accepted by SHPD on March 1, 2013 (Log No. 2013.1957, Doc. No. 1302SL29. The AIS report (Hammatt et al. 2013) was reviewed and accepted by SHPD on August 26, 2013 (Log No. 2013.2279, 2013.4326, Doc. No. 1308SL20).

The Airport Section 3 project area consists of approximately 4.8 miles of the 20-mile transit corridor. The project area correlates with the area of direct ground disturbance, which totals 9.06 acres. The Honolulu High-Capacity Transit Corridor Project is a federal undertaking subject to Section 106 of the National Historic Preservation Act due to federal (FTA) funding and to use of federal lands (US Navy). The FTA determined that the undertaking will have an adverse effect on historic properties eligible for listing or are currently listed on the National Register of Historic Places. The Hawaii State Historic Preservation Officer concurred. To mitigate the potential adverse effects, a programmatic agreement (PA) was executed on January 18, 2011.

The archaeological monitoring plan (AMP) was prepared for the City and County of Honolulu and the Federal Transit Administration on behalf of PB Americas, Inc. The AMP addresses documentation of the two previously-identified historic properties recorded during the AIS – buried remnant sections of a buried asphalt roadway (SIHP 50-80-13-7420) and buried remnants of military infrastructure including concrete slabs, a coral pavement, and base course deposits (SIHP 50-80-13-7421). It also addresses appropriate documentation of any as yet to be identified historic properties within Section 3; the monitoring report also will include documentation of any inadvertent finds encountered in Section 1.

The archaeological monitoring plan provides a good discussion of the project, environs, traditional and historical background, previous archaeological investigations and findings, and the archaeological monitoring provisions.

Please address the two following concerns:

(1) Clarify whether the project area includes federal lands (US Navy), including Pearl Harbor Naval Base Station and the applicability of NAGPRA.
(2) Insert proper citation references for the AISP, Addendum AISP, and AIS report in Sections 1.5 and 1.6 pertaining to the Traditional Historical Background and Previous Archeological Research sections.

This plan meets the requirements specified in the Secretary of the Interior's Standards for Archeological Documentation and the requirements set forth in Hawaii Administrative Rules (HAR) §13-279-4. It is accepted with the understanding that the minor revisions mentioned above are made. 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 me at (808) 692-8019 or at Susan.A.Lebo@hawaii.gov if you have any questions or concerns regarding this letter.

Aloha,

Susan A. Lebo
Oahu Lead Archaeologist
April 1, 2014

Elizabeth Scanlon  
Director of Planning, Utilities, Permits, and Right-of-Way  
Honolulu Authority for Rapid Transportation  
1099 Alakea Street  
Suite 1700  
Honolulu, HI 96813  

Re: Honolulu Authority for Rapid Transit (HART) consultation on Aloha Stadium and Pearl Harbor Station design

Dear Ms. Scanlon:

This letter is regarding the ongoing Honolulu Transit Project consultation for the segment along Kamehameha Highway and adjacent to the Pearl Harbor National Historic Landmark (NHL). Specific points of discussion include the multiple levels of National Park Service involvement and the most recent consultation meetings that were scheduled to resolve the objections raised by Historic Hawaii Foundation and the National Trust for Historic Preservation regarding HART’s adherence to the Programmatic Agreement for the Honolulu High Capacity Transit Corridor (HHCTC PA).

The National Park Service (NPS) has participated in consultations regarding the Honolulu Transit Project since 2006. NPS involvement is based on multiple levels of legislative authority and regulatory responsibilities that include: monitoring responsibilities for National Historic Landmarks under NHPA Section 110(f) and 36 CFR 65.7 and 800.10, Federal Lands to Parks Program under the Federal Property Administrative Services Act of 1949, Section 4(f) in accordance with 23 CFR 774.17 and NPS Stewardship and Management responsibilities for WWII Valor in the Pacific National Monument, which is located within the boundary of the Pearl Harbor NHL. These areas of responsibility rest within different divisions of the National Park Service with different points of contact. NPS would like to ensure that our participation in Section 106 consultation is not interpreted or assumed to replace or fulfill HART’s need to discuss those issues outside Section 106 with the appropriate NPS point of contact. Since HART has had several recent staffing changes, it seems timely for NPS to reiterate who the points of contact are for the various areas of NPS responsibility for this project.

Discussions regarding Section 106 including impacts to NHLs and implementation of the PA should be addressed to Elaine Jackson Retondo, NPS Pacific West NHL Program Manager and Acting Regional Historian; questions and discussions regarding vehicular and pedestrian safety for visitors to and from WWII Valor in the Pacific National Monument as well as any other access, coordination,
and collaboration with the Monument should be addressed to Paul DePrey, Superintendent at WWII Valor in the Pacific National Monument; communications related to Federal Lands to Parks should be addressed to David Siegenthaler, NPS Pacific West, Federal Lands to Parks Program. NPS also requests that HART courtesy copy the NPS Pacific Area Manager, Melia Lane-Kamahele and the NPS Pacific West Chief of Cultural Resources, David Louter in all correspondence and meeting invitations. The enclosed attachment includes the contact information for the above mentioned NPS staff. Internally, NPS staff will continue to inform one another of respective work and concerns; however, HART and FTA are responsible for initiating and conducting the necessary consultations and collaboration with the appropriate NPS division.

We thank HART for inviting the National Park Service to the March 13, and March 20, 2014 consultation meetings. HART called the first meeting at the request of the Historic Hawaii Foundation (HHF) to resolve a dispute over interpretation and implementation of a provision in the Programmatic Agreement (PA) for the Honolulu High Capacity Transit Corridor (HHCTC). More specifically, HHF stated in a January 6, 2014 letter to the Federal Transit Administration that they believed HART was or would shortly be “in breach of Stipulation IV Design Standards” due to HART’s decision to reverse an established course of treatment and would exclude Aloha Stadium from Stipulation IV of the HHCTC PA. Stipulation IV reads as follows:

IV. Design Standards

A. The City shall develop standards for, and maintain and update the Project’s Design Language Pattern Book for use in all Project elements. The pattern book shall be available electronically. For stations within the boundary of or directly adjacent to an eligible or listed historic property, the City shall comply with The Secretary of the Interior’s Standards for the Treatment of Historic Properties, 36 C.F.R. pt. 68, and will make every reasonable effort to avoid adverse effects on historic properties. If the FTA, the City and the Kako’o find that the standards cannot be applied, the City shall consult with the consulting parties to develop a treatment plan to minimize and mitigate adverse effects on the historic property.

The HHF January 2014 letter further states,

For over a year, the City has stated that these provisions will apply to the Aloha Stadium Station. However, in a letter from HART to HHF dated December 11, 2013 (received December 23, 2013), HART reversed its position, stating that “In the case of Aloha Stadium Station, the SOI standards do not apply and no further compliance actions are required under Stipulation IV.A of the PA.

The National Trust for Historic Preservation (NTHP) endorsed HHF’s objection in a letter dated March 12, 2014. The NTHP letter explained why the NTHP “believes the new interpretation is arbitrary, capricious, abuse of discretion, and otherwise contrary to law.” Following the March 13 meeting, HART and FTA agreed to honor the original assessment and continue consultation under Stipulation IV.A for Aloha Stadium Station. The March 20 meeting continued this consultation.

NPS is encouraged by these actions by HART and FTA; however, remains concerned about the visual impact that will result from the currently proposed Aloha Stadium Station design. The images that HART presented during the most recent call (see attached) and the discussion that ensued, were discouraging. Responses from the HART team to changes suggested by consulting parties clearly indicated that HART is prepared to consider very few changes that would minimize the effect.
Suggestions from consulting parties included shifting the station mauka to achieve a greater setback from Kamehameha Highway, shifting the station further north to the other side of Salt Lake Boulevard or straddling Salt Lake Boulevard. These suggestions were dismissed by HART as not possible. NPS believes that HART has stated that consultation regarding the design of Aloha Stadium Station is in the second phase of Stipulation IV.A. — development of a treatment plan to minimize and mitigate adverse effects on the property. NPS requests that HART confirm whether this is the case and provide consulting parties a list or description of where there is room for change that could potentially minimize effects. Based on discussions during the March 20 meeting, it seems to be limited to, exterior finish and color.

As consultation on the Aloha Stadium Station continues, it seems that it would be beneficial to also discuss the design of Pearl Harbor Station, which is located a little more than a mile from the Aloha Stadium Station and also on the mauka side of Kamehameha Highway adjacent to the Pearl Harbor NHL. While HART has stated that Aloha Stadium Station is part of the Phase I bid package and Pearl Harbor Station is part of the Phase II bid package and therefore on different timelines, this does not preclude an integrated discussion of the station designs under Section 106 consultation. A holistic discussion is justified because, both stations are adjacent to and adversely affect the Pearl Harbor NHL. Additional questions regarding Pearl Harbor Station include status of the Makalapa and Little Makalapa National Register of Historic Places nomination and land transfer for the station.

We look forward to continued consultation.

Sincerely,

[Signature]

Patricia Neubacher,
Deputy Region Director, Pacific West Region

Enclosures

Cc: Electronic copy only
FTA: Ted Matley
SHPD: William Aiala, Alan Downer
ACHP: Charlene Vaughan, Blythe Semmer
HART: Dan Grabauskas, Brennon Morioka, Paul Cleghorn
NTHP: Elizabeth Merritt
NPS: Melia Lane-Kamahele, David Louter, Paul DePrey, Elaine Jackson-Retondo
OIBC: Hinaleimoana Wong-Kalu
AHCC: Mahealani Cypher
OHA: Jerry Norris

National Park Service
RE: HART consultation on Aloha Stadium and
Pearl Harbor Station design
March 31, 2014
## National Park Service Contact Information for Honolulu Transit Project

| Section 106 Consultation and National Historic Landmarks | Elaine Jackson-Retondo, Ph.D  
National Historic Landmarks Program Manager, Pacific West Region  
elaine_jackson-retondo@nps.gov | National Park Service  
333 Bush Street, Suite 500  
San Francisco, CA 94104-2828  
415-623 2368 |
|----------------|---------------------------------|---------------------------------|
| WWII Valor in the Pacific National Monument | Paul DePrey  
Superintendent  
paul_deprey@nps.gov | WW II Valor in the Pacific National Monument  
National Park Service  
1845 Wasp Blvd, Bldg #176  
Honolulu, HI 96818  
808-266-0826 |
| Federal Lands to Parks | David Siegenthaler  
david_siegenthaler@nps.gov | National Park Service  
333 Bush Street, Suite 500  
San Francisco, CA 94104-2828  
415-623-2334 |
| Pacific Islands Office | M. Melia Lane-Kamahele  
Manager, Pacific Islands Office - Honolulu  
melia_lane-kamahele@nps.gov | National Park Service  
300 Ala Moana Boulevard, Room 6226,  
Box 50165  
Honolulu, Hawaii 96850  
808-541-2693 x729 |
| Cultural Resources Division Pacific West Region | David Louter, Ph.D.  
Chief, Cultural Resources, Pacific West Region  
david_louter@nps.gov | National Park Service, Cultural Resources  
909 First Avenue, Fifth Floor  
Seattle, WA 98104  
206-220-4137 |
transmittal

Date: April 16, 2014
To: Mike Gustard
State Historic Preservation Office
601 Kamokila Blvd., Suite 555
Kapolei, HI 96707

Copy:
From: Lorraine Minatoishi

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The enclosed disks contain the true and correct copy of the nomination for the Waiekele Canal Bridge & Highway Overpass (OR&L Bridge) to the National Register of Historic Places.
transmittal

Date: April 16, 2014
To: Mike Gushard
State Historic Preservation Office
601 Kamokila Blvd., Suite 555
Kapolei, HI 96707

Copy:
From: Lorraine Minatoishi

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The enclosed disks contain the true and correct copy of the nomination for the Waiauwa Bridge to the National Register of Historic Places.
transmittal

Date: April 17, 2014
To: Mike Gushard
State Historic Preservation Office
601 Kamokila Blvd., Suite 555
Kapolei, HI 96707

Copy:
From: Lorraine Minatoishi

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The enclosed disks contain the true and correct copy of the nomination for the ʻIonioulii Bridge to the National Register of Historic Places.
Aloha Programmatic Agreement Signatories and Consulting Parties,

HART, in coordination with FTA and the Kako‘o, offer the draft Treatment Plan for Cultural and Historic Resources at the Aloha Stadium Station for your review and comment.

For those of you that plan to participate in today’s HART/Kako‘o Monthly Meeting, we will walk through the document with you.

We respectfully request your review and written comments be provided to me by Friday, May 9, 2014. The schedule to complete this Plan is as follows:

1. Signatories/Consulting Parties provide written comments on Draft document to HART by May 9th
2. HART addresses comments and distributes revised Draft on May 15th
3. Signatories/Consulting Parties provide Final HART final comments in writing by May 22nd
4. HART distributes the final Treatment Plan and posts to website May 29th

Please note that meeting summaries for meetings on March 13th; March 19th; and March 27th are included in the plan as Attachments 2F; 2G; and 2H.

We look forward to receiving your comments. Thank you for your continued participation!

Mahalo,

Liz Scanlon
Director of Planning
Utilities, Permits, and Right-of-Way

Honolulu Authority for Rapid Transportation
1099 Alakea Street
Suite 1700
Honolulu, HI 96813
Mobile: 808-630-0696
Office: 808-768-6236
e-mail: escanlon@honolulu.gov
www.honolulustransit.org

"...what really counts is not the immediate act of courage or of valor, but those who bear the struggle day in and day out - not the sunshine patriots but those who are willing to stand for a long period of time." - John Fitzgerald Kennedy
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May 8, 2014

Liz Scanlon
Director of Planning, Utilities, Permits, and Right of Way
Honolulu Authority for Rapid Transportation
1099 Alakea Street
Suite 1700
Honolulu, HI 96813

RE: HHF Comments on draft Treatment Plan for Cultural and Historic Resources at the Aloha Stadium Station

Dear Ms. Scanlon:

Historic Hawai‘i Foundation (HHF) received the Honolulu Authority for Rapid Transportation’s (HART) draft Treatment Plan for Cultural and Historic Resources at Aloha Stadium Station for the Honolulu Rail Transit Project, dated April 23, 2014 (received via email April 23, 2014), along with HART’s request for written comments by May 9, 2014.

Stipulation IV. A (Design Standards) of the Programmatic Agreement (PA) states that, “For stations within the boundary of or directly adjacent to an eligible or listed historic property, the City shall comply with The Secretary of the Interior’s Standards...and shall make every reasonable effort to avoid adverse effect on historic properties....If the FTA, the City and the Kako‘o’o find that the standards cannot be applied, the City shall consult with the consulting parties to develop a treatment plan to minimize and mitigate adverse effects on the historic property.”

At previous consultation meetings and in written communications, HART confirmed that Stipulation IV. A applies to Aloha Stadium Station due to its relationship to the Pearl Harbor National Historic Landmark. Although not explicitly stated in the draft treatment plan, it is assumed that the FTA, Kako‘o’o and City reached consensus that the SOI Standards cannot be applied, and that therefore the treatment plan will provide the mechanism for compliance with Stipulation IV. A.

HHF provided written and verbal comments previously about the effect of the station and the guideway on the Pearl Harbor NHL, and provided recommendations for ways to avoid, minimize and mitigate the effect. These comments included requests for collaboration and design workshops dating back to 2011, specifically to identify ways to increase compatibility with the historic setting, feeling, association and context.

Despite HHF’s repeated requests, HART did not and has not engaged with the consulting parties on that level, but instead has indicated that the station’s design is fixed and not subject to further discussion or revision. During its presentation at the recent consultation meeting of April 23, 2014, and through the draft treatment plan, HART proposes to limit any changes merely to issues of color and plant selection. HHF feels that this limitation on alternatives wholly fails to address the issues of scale, mass, bulk, and visual intrusion.
Unfortunately, HART’s apparent lack of willingness to address the actual issues has led HHF to conclude that HART’s approach to the station area design has not been conducted in good faith, and that the consultation for minimizing and mitigating effects has been inappropriately limited in scope.

Despite these severe misgivings, HHF provides these additional written comments on the draft treatment plan for your consideration:

Section 3.3: Effects on Historic Property
HHF concurs with the finding that “the effects to the property are related to the setting, feeling, and association.”

The draft treatment plan includes a variety of photo simulations and view shed renderings from various vantage points both to the station from the NHL and to the NHL across or past the station. However, none of the referenced views includes the most direct and most likely perspective: viewing the Aloha Stadium Station at ground/eye level across Kamehameha Highway at Richardson Field within the historic landmark boundary.

For the human scale (rather than the birds’ eye or geographic perspectives) there is an obvious and striking adverse effect. Richardson Field is an historic open field. The massing, form and footprint of the station is huge and will have a visual impact to the landmark. A relevant rendering was provided in the consultation packet for the meeting on March 27, 2014.

Previous consulting party comments have focused specifically on this perspective and aspect of the station design, so it is particularly notable that this view was excluded from the draft treatment plan, and no measures have been proposed specifically to address it.

Section 4.2 Measures to Minimize and Mitigate Effects

Minimizing Effects:
As has been stated previously (e.g. in conversation with HART, NAVY and Anil Verma on March 27; and via email to signatories and consulting parties on April 4), HHF recommends that HART develop a design concept that would minimize the visual impact on the historic landmark.

The design concept mirrors the approach taken by the project at other stations, where there is a single ground-level touchdown for passengers accessing the system and a mezzanine level is used to move passengers to and from the platform on the other side of the station. Passengers would enter through the fare gate and access the platform via vertical circulation located on the mauka side of the facility. They would either proceed directly to platform level, or change at the mezzanine level to access the makai side of the facility. There would be little or no mass at the ground level at that side, as it would be supported through cantilever system. In addition, any auxiliary buildings or systems located at ground level would be located away from the NHL-side (Kamehameha Highway).

This concept would help to open up the ground plane on the makai side of the station, help provide a setback from the highway and sidewalk, and help alleviate the visual impact to the historic landmark as viewed from Richardson Field. Within the newly-created setback, additional landscaping, buffering or screening could be provided.
In addition, the lighter massing would have fewer ground disturbances and so is less likely to disturb cultural resources or subsurface historic properties. The area needed for the facility is not significantly larger or shifted from the current configuration, so would not have further consequences for parking, bus transfer areas or sidewalks. It would not affect the turning radius of the guideway, nor is it an entirely new or untested design, as it is essentially what is suggested for the Pearl Harbor Station at the next stop.

Therefore, we feel that this design has merit for minimizing the effect on the historic property while avoiding the unintended consequences that were mentioned in the discussion of alternatives.

**Mitigating Effects:**

HHF also recommends additional ways to mitigate effects:

- As discussed extensively, HHF prefers to see mitigation measures that will improve and connect the passengers to the historic landmark, especially the historic sites that are available for public visitation (e.g. Pearl Harbor Visitors’ Center, USS Bowfin) and for residents and workers (e.g. Ford Island). The passengers need a safe and more efficient way to get across the street and access the historic properties. Improvements need to be made with the roads; the traffic signal timings; crosswalks; and pedestrian facilities on the landmark side of Kamehameha Highway.

HART has indicated its agreement that these improvements are desirable, but states that they are outside its jurisdiction, and require joint action with the State Department of Transportation, the Navy, and the National Park Service.

Therefore, HHF recommends that the mitigation measures include:

  - A commitment for a joint effort among the relevant stakeholders to develop a comprehensive approach for improved access and safety between the station and the historic sites. While this intent is referenced in Chapter 5 (Summary and Future Actions), it lacks specificity for timing and responsibility. Therefore, the mitigation measure should include an action plan to include responsible parties, timelines, deliverables, and measures for success. This action plan shall be completed prior to any construction beginning at Aloha Stadium Station; and

  - HART shall establish a fund to be used to support the improvements that will be developed through the planning effort. The amount can be determined by a reasonable estimate of costs for improvements, and a reasonable division of costs between the various responsible parties (e.g., roughly 25% each could be assumed by HART, DOT, NPS and NAVY).

  - This approach mirrors the stipulation developed to address adversely affected parks elsewhere in the project vicinity (see PA Stipulation VIII.D).

- Although HHF prefers to see onsite minimization and mitigation, we are also open to discussion of enhancing HART’s other preservation programs that can be used to preserve and rehabilitate historic properties elsewhere.
HART could provide additional funding for the historic preservation grant program (see PA Stipulation IX.B) and direct the Historic Preservation Committee to prioritize grants in the geographic vicinity of the Stadium Station.

We look forward to further discussion and development of these concepts and alternatives, and to them being incorporated into the final treatment plan.

Very truly yours,

Kiersten Faulkner, AICP
Executive Director

Copies via email:
FTA: Ted Matley
HART: Stanley Solamillo
ACHP: Blythe Semmer
SHPD: Michael Gushard, Susan Lebo
NAVY: Jeff Dodge, Charlene Oka-Wong
Kākoʻo: Paul Cleghorn
NTHP: Betsy Merritt
NPS: Elaine Jackson-Retondo, Paul DePrey, Melia Lane-Kamehele
OIBC: Hinaleimoana Wong-Kalu
AHCC: Mahealani Cypher
OHA: Jerry Norris
Aloha Programmatic Agreement Signatories and Consulting Parties,

As a preview for discussion tomorrow, attached is the Scope of Work for the Historic Context Studies. This has been vetted with Kako’o and SHPD. We will be discussing the work plan at our meeting tomorrow.

Mahalo!

Liz Scanlon  
Director of Planning  
Utilities, Permits, and Right-of-Way

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"...what really counts is not the immediate act of courage or of valor, but those who bear the struggle day in and day out - not the sunshine patriots but those who are willing to stand for a long period of time." - John Fitzgerald Kennedy
transmittal

Date: May 29, 2014
To: Mike Gushard
State Historic Preservation Office
601 Kamokila Blvd., Suite 555
Kapolei, HI 96707

Copy: Stanley Solamillo, Architectural Historian, HART
From: Lorraine Minatoishi

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Remarks: Please replace the May 26 Big Makalapa submittal with this one. Thank you!
transmittal

Date: May 29, 2014

To: Mike Gushard
State Historic Preservation Office
601 Kamokila Blvd., Suite 555
Kapolei, HI 96707

Copy: Stanley Solamillo, Architectural Historian, HART

From: Lorraine Minatoishi

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June 20, 2014

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

Dear Mr. McDermott:

SUBJECT: Chapter 6E-8 and National Historic Preservation Act (NHPA) Section 106 Review – Supplemental Archaeological Inventory Survey Plan for the City Center (Section 4) of the Honolulu Rapid Transit Project Kalihi, Kapālama, Honolulu, Waikīkī Ahupua'a, Honolulu (Kona) District, O'ahu TMK: (1) 2-1, 2-3 (Various Plats and Parcels)

Thank you for the opportunity to review this revised draft report titled Supplemental Archaeological Inventory Survey Plan for the City Center (Section 4) of the Honolulu Rapid Transit Project, Kalihi, Kapālama, Honolulu, and Waikīkī Ahupua’a, Honolulu (Kona) District, O‘ahu Addressing Changes from the Vicinity of Ward Avenue and Halekauwila Street to the Vicinity of Queen and Kamake’e Streets TMK: [1] 2-1, 2-3 (Various Plats and Parcels) (Humphrey and McDermott, June 2014). We received this submittal on June 16, 2014. The archaeological inventory survey plan (AISP) for the City Center Construction Segment (Section 4) (Hammatt et al. 2011) was reviewed and accepted by SHPD on October 25, 2011 (Log No. 2011.2379, Doc. No. 1110NN08). Subsequently, the Kaka’ako Station footprint was relocated and an Addendum AISP (Hammatt et al. 2013) was reviewed and accepted by SHPD on March 1, 2013 (Log No. 2013.1958, Doc. No. 1302SL28).

This supplemental archaeological inventory survey plan (Supplemental AISP) was prepared to address the newly-proposed reconfiguration of the Kaka’ako Station and adjacent corridor alignment. The supplemental AISP project area and area of potential effect (APE) occurs on property owned by Howard Hughes Corporation on the eastern side of Ward Avenue, and along Queen Street on lands under the jurisdiction of the State of Hawai‘i, specifically the Hawai‘i Community Development Authority (HCDA). A subsurface cultural deposit, including an isolated human cranial fragment and six pits (SIHP 50-80-14-7429) was identified in seven of the AIS trenches excavated in proximity to the proposed Kaka’ako Station (Trenches T-167, T-168, T-168A, T-168B, T-169, T-170, and T-170A). The human cranial fragment was found in T-170. The Supplemental AISP proposes excavation of 14 trenches (T-162A, T-162B, T-162C, T-170B, T-171A, T-172B, T-173A, T-175B, T-175C, T-176A, T-177A, T-179A, T-180A, and T-181A). Of these, three will investigate the touchdown footprint of the station and 11 will test column locations.

This Supplemental AISP provides adequate figures and discussion of the AIS and Addendum AIS configurations of the Kaka’ako Station and adjacent transit route, the newly-proposed configurations, and the proposed Supplemental AIS testing strategy and trench locations. The excavation, data collection, and laboratory analysis methods will be the same as those used during the AIS and Addendum AIS. The revised plan addresses the issues and concerns raised in our earlier correspondence (May 14, 2014; Log No. 2014.01923, Doc. No. 1405SL12).

This Supplemental AISP meets the standards specified in Hawai‘i Administrative Rule §13-279-4 and in the Secretary of the Interior’s Standards for Archaeological Documentation. It is accepted. 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 me at (808) 692-8019 or at Susan.A.Lebo@hawaii.gov if you have any questions or concerns regarding this letter.

Aloha,

Susan A. Lebo, PhD
Oahu Lead Archaeologist
June 23, 2014

Mr. Matt McDermott
Cultural Surveys Hawai‘i, Inc.
P.O. Box 1114
Kailua, HI 96734

Dear Mr. McDermott:

SUBJECT: Chapter 6E-8 and National Historic Preservation Act (NHPA) Section 106 Review—Archaeological Monitoring Plan for City Center (Section 4) of the Honolulu Rapid Transit Project

Kalihi, Kapālama, Honolulu, and Waikīkī Ahupua‘a, Honolulu (Kona) District, O‘ahu

TMK: (1) 1-2, 1-5, 1-7, 2-1, 2-3 various

Thank you for the opportunity to review this draft report titled Archaeological Monitoring Plan for the City Center (Section 4) of the Honolulu Rapid Transit Project, Kalihi, Kapālama, Honolulu, and Waikīkī Districts, O‘ahu TMK Sections [1] 1-2, 1-5, 1-7, 2-1, 2-3 (Various Plats and Parcels) (Hammatt, May 2014). We received this submittal on May 13, 2014. The archaeological inventory survey plan (AISP) for the City Center (Hammatt et al. 2011) was reviewed and accepted by SHPD on October 25, 2011 (Log No. 2011.2379, Doc. No. 1110NN08). Subsequently, the Kaka‘ako Station footprint was relocated and an Addendum AISP (Hammatt et al. 2013) was reviewed and accepted by SHPD on March 1, 2013 (Log No. 2013.1958, Doc. No. 1302SL28). The City Center (Section 4) AJS (Hammatt 2013) was reviewed and accepted by SHPD on August 26, 2013 (Log No. 2013.2564, 2013.4338, Doc. No. 1308SL21). An Interim Protection Plan for the Honolulu Rapid Transit Project including the City Center (Section 4) was reviewed and accepted by SHPD on August 29, 2013 (Log No. 2013.5066A, Doc. No. 1308PA01). A supplemental AIS for City Center to address additional changes to the Kaka‘ako Station and vicinity (Humphrey and McDermott, June 2014) was reviewed and accepted by SHPD on June 20, 2014 (Log No. 2014.02615, Doc. No. 1406SL22).

The City Center (Section 4) project area consists of approximately 4.3 miles of the 20-mile transit corridor. The project area correlates with the area of direct ground disturbance, which totals 13 acres. The Honolulu Rapid Transit Project is a federal undertaking subject to Section 106 of the National Historic Preservation Act due to federal (FTA) funding and to use of federal lands (US Navy). The FTA determined that the undertaking will have an adverse effect on historic properties eligible for listing or are currently listed on the National Register of Historic Places. The Hawaii State Historic Preservation Officer concurred. To mitigate the potential adverse effects, a programmatic agreement (PA) was executed on January 18, 2011.

The archaeological monitoring plan (AMP) was prepared for the City and County of Honolulu and the Federal Transit Administration on behalf of PB Americas, Inc. It provides adequate discussion of the project, environs, traditional and historical background, previous archaeological investigations and findings, and the archaeological monitoring provisions. The plan also addresses proposed additional documentation of the 19 historic properties recorded within the Section 4 project area, of one historic property adjacent to the project area which might be impacted during construction (see Table 1), and of any as yet to be identified historic properties.

This plan meets the requirements specified in the Secretary of the Interior's Standards for Archeological Documentation and in Hawaii Administrative Rules (HAR) §13-279-4. It is accepted. 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 me at (808) 692-8019 or at Susan.A.Lebo@hawaii.gov if you have any questions or concerns regarding this letter.

Aloha,

Susan A. Lebo, PhD
Oahu Lead Archaeologist

### Table 1. Archaeological Historic Properties Identified During AIS in City Center Section 4

<table>
<thead>
<tr>
<th>Site (50-80-14)</th>
<th>Description</th>
<th>HAR Significance</th>
<th>NR Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>2918</td>
<td>Subsurface cultural layer and human burials</td>
<td>Criteria d, e</td>
<td>Criterion D</td>
</tr>
<tr>
<td>2936</td>
<td>Subsurface cultural deposit, pond sediments, human and animal burials</td>
<td>Criteria d, e</td>
<td>Criterion D</td>
</tr>
<tr>
<td>5368</td>
<td>Subsurface Kūwili Fishpond sediments</td>
<td>Criterion d</td>
<td>Criterion D</td>
</tr>
<tr>
<td>5820</td>
<td>Subsurface cultural deposit and human burials</td>
<td>Criteria d, e</td>
<td>Criterion D</td>
</tr>
<tr>
<td>5966</td>
<td>Subsurface Kawa Fishpond sediments</td>
<td>Criterion d</td>
<td>Criterion D</td>
</tr>
<tr>
<td>6636</td>
<td>Subsurface Kewalo wetland deposit</td>
<td>Criteria a, d</td>
<td>Criterion D</td>
</tr>
<tr>
<td>6856</td>
<td>Subsurface Kolowalu Fishpond sediments</td>
<td>Criterion d</td>
<td>Criterion D</td>
</tr>
<tr>
<td>7124</td>
<td>Subsurface infrastructure remnants</td>
<td>Criteria a, d</td>
<td>Criterion D</td>
</tr>
<tr>
<td>7189</td>
<td>Subsurface burnt trash deposit</td>
<td>Criteria a, d</td>
<td>Criterion D</td>
</tr>
<tr>
<td>7190</td>
<td>Subsurface salt pan remnants</td>
<td>Criteria a, d</td>
<td>Criterion D</td>
</tr>
<tr>
<td>7193</td>
<td>Subsurface trash deposit</td>
<td>Criterion d</td>
<td>Criterion D</td>
</tr>
<tr>
<td>7197*</td>
<td>Subsurface cultural deposit and fire pit feature</td>
<td>Criteria a, d</td>
<td>Criterion D</td>
</tr>
<tr>
<td>7425</td>
<td>Subsurface fire feature remnant</td>
<td>Criterion d</td>
<td>Criterion D</td>
</tr>
<tr>
<td>7426</td>
<td>Subsurface wetland deposit</td>
<td>Criterion d</td>
<td>Criterion D</td>
</tr>
<tr>
<td>7427</td>
<td>Subsurface infrastructure remnants, subsurface cultural deposits, human skeletal element</td>
<td>Criterion d, e</td>
<td>Criterion D</td>
</tr>
<tr>
<td>7428</td>
<td>Subsurface cultural deposit and historic building foundation</td>
<td>Criterion d</td>
<td>Criterion D</td>
</tr>
<tr>
<td>7429</td>
<td>Subsurface cultural deposit and human skeletal element</td>
<td>Criterion d, e</td>
<td>Criterion D</td>
</tr>
<tr>
<td>7430</td>
<td>Subsurface privy remnant</td>
<td>Criterion d</td>
<td>Criterion D</td>
</tr>
<tr>
<td>7506</td>
<td>Subsurface incinerated trash deposit</td>
<td>Criterion d</td>
<td>Criterion D</td>
</tr>
</tbody>
</table>

*7197 is located in immediate proximity to project APE and may potentially be affected by project construction.
Aloha Programmatic Agreement Signatories and Consulting Parties,

Attached is the Pre-Final Treatment Plan for Cultural and Historic Resources at Aloha Stadium Station. Attachment 2 in the document details Consulting Parties’ comments and HART’s responses.

We anticipate the Final Treatment Plan will be available on our website next week. Please note that the Treatment Plan will be incorporated into the construction contract.

Please do not hesitate to contact me should you have any questions.

Mahalo,

Jon Y. Nouchi | Deputy Director, Planning and Environmental | Honolulu Authority for Rapid Transportation (HART)

address 1099 Alakea Street, Suite 1700 | city Honolulu | state Hawaii | zip 96813
phone 808.768.6275 | mobile 808.479.4467 | email jnouchi@honolulu.gov

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