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LAND
STATE PARKS

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