Section 106 Consultation
Publication Form

Project Name: Dowsett Highlands Relief Sewer
Island: Oahu
District: Nu'uanu Ahupua'a, Honolulu District,
TMK: [1] 1-7, 1-8, 1-9, and 2-2
Permits:

Applicant or Proposing Agency:
State of Hawaii, Department of Health, Environmental Division, Wastewater Branch
919 Ala Moana Boulevard, Room 309
Honolulu, Hawaii, 96814
Contact & Phone: Ms. Sue Liu, (808) 586-4294

Approving Agency:
State of Hawaii, Department of Health, Environmental Division, Wastewater Branch
Contact & Phone: Ms. Sue Liu, (808) 586-4294

Consultant:
Status: Comments due no later than November 7, 2017 to:
919 Ala Moana Boulevard, Room 309
Honolulu, Hawaii, 96814
Attn: Ms. Sue Liu
Email: wwb@doh.hawaii.gov

Summary:

The Department of Health (DOH) initiated Section 106 of the National Historic Preservation Act (NHPA) consultation with the State Historic Preservation Division (SHPD) in accordance with 36 CFR Part 800. In 1990, the U.S. Environmental Protection Agency (EPA) designated the DOH to act on EPA's behalf, pursuant to 36 CFR §800.2 (c) (4), when initiating Section 106 of the NHPA process in connection with projects funded under the Hawaii Clean Water State Revolving Fund (CWSRF).

The DOH is providing funding under the CWSRF to the City and County of Honolulu's (CCH) for the Dowsett Highlands Relief Sewer Project. The proposed project will utilize federal funding and is considered an undertaking, as defined by Section 106 of the NHPA, 54 U.S.C. §306101 et seq., and 36 CFR Part 800.

The proposed project involves design and construction of approximately 16,850 linear feet of 8-inch to 24-inch diameter new gravity sanitary sewers. The main alignment is proposed to begin along Nu'uanu Pali Drive, follow along Pali Highway, Dowsett Avenue, Pali Highway and Nu'uanu Avenue, and end at School Street. Branch sewers intercepting or replacing existing sewer mains are proposed along Wyllie Street, Lā'imi Road, Pelekane Drive, Jack Lane and Ahi Place.

The DOH has engaged SHPD to determine the presence of potential sites of historic importance within the vicinity of the project area as well as the potential impact of the project on such sites, if present. A selective architectural reconnaissance level survey to properly identify, document and address potential effects to any surface historic properties within the area of potential effect has been submitted SHPD. In addition, an archaeological monitoring plan, meeting the requirements of Hawaii Administrative Rules Chapter 13-279-4, has been developed for all ground disturbance work and submitted to SHPD for review and approval.
September 26, 2017

Dr. Alan Downer, Administrator
Hawai‘i State Historic Preservation Division
Department of Land and Natural Resources
Kakuhihewa Building
601 Kamokila Blvd., Suite 555
Kapolei, Hawaii 96707

Dear Dr. Downer:

SUBJECT: Section 106 National Historic Preservation Act (NHPA) Consultation
Dowsett Highlands Relief Sewer Project, Nu‘uanu Ahupua‘a,
Honolulu District, O‘ahu, TMKs: [1] 1-7, 1-8, 1-9, and 2-2

Initiation of Consultation
The State of Hawaii Department of Health (DOH) seeks to initiate Section 106 consultation under the National Historic Preservation Act (NHPA) with the State Historic Preservation Division (SHPD). DOH will receive funding from the Environmental Protection Agency (EPA) under the Clean Water State Revolving Fund (CWSRF) for the Dowsett Highlands Relief Sewer Project, Nu‘uanu Ahupua‘a, Honolulu District, O‘ahu, TMKs: [1] 1-7, 1-8, 1-9, and 2-2. The CWSRF was established by the 1987 amendments to the Clean Water Act (CWA) as a financial assistance program for a wide range of water infrastructure projects, under 33 U.S. Code §1383. The CWSRF program is a federal-state partnership that provides communities a permanent, independent source of low-cost financing for a wide range of water quality infrastructure projects. The Dowsett Highlands Relief Sewer Project has been determined to be a federal undertaking as defined in 36 CFR 800.16(y), due to federal funding from the EPA and is subject to Section 106 of the NHPA. The DOH was authorized by EPA to initiate consultation with the SHPD. Preliminary consultation pertinent to Section 106 review was received from the SHPD in a Chapter 6E-8 and National Historic Preservation Act (NHPA) Section 106 Review dated May 26, 2017 (Log No. 2017.00760, Doc. No. 1705GC08, Attachment 3.)

Project Description and APE
The project improvements are described as follows: design and construction of approximately 16,850 linear feet of 8-inch to 24-inch diameter new gravity sanitary sewers. The main alignment is proposed to begin along Nu‘uanu Pali Drive, follow along Pali Highway, Dowsett Avenue, Pali Highway and Nu‘uanu Avenue, and end at School Street. Branch sewers intercepting from existing mains are proposed along Wyllie Street, Lā‘imi
Road, Pelekane Drive, Jack Lane and Ahi Place. Other improvements include localized relief and/or replacement sewers to address existing sewers with hydraulic capacity deficiencies not fully addressed by the proposed main relief sewer. These include short segments of sewers next to South Judd Street along Craigside Place, and the Pelekane Drive and Laimi Road sanitary sewer bridge crossings. Construction of the new relief sewers will utilize a combination of trenchless technologies (micro-tunneling) and open trenching. The project area of potential effect (APE), including staging areas, consists of approximately 37.22 acres (15.06 hectares) and is depicted on a USGS Honolulu Quadrangle topographic map (Attachment 1) and an aerial photograph (Attachment 2).

Consultation and Evaluation of Historic Properties

On March 27, 2017, the SHPD reviewed an Archaeological Literature Review and Field Inspection for the Dowsett Highland Relief Project, prepared by Cultural Surveys Hawai‘i, Inc. (Belluomini et al., November 2015) in a Chapter 6E-8, Request for a Historic Properties Determination Dowsett Highlands & Relief Sewer Project (Attachment 4). The SHPD accepted this document as supportive material designed to facilitate project planning and the historic preservation review process (March 27, 2017; Log No. 2015.04034, Doc. No. 1703SL21). In that March 27, 2017 review, the SHPD requested the following: (1) completion of an architectural reconnaissance level survey (RLS); (2) the opportunity for SHPD to review the 60% and 90% design plans of the project APE; (3) completion of an archaeological monitoring plan (AMP); and (4) consultation with the SHPD prior to conducting the RLS.

As part of a reasonable and good faith effort to identify historic properties (architectural, archaeological, or traditional cultural properties [TCPs]) within the area of potential effect (APE) pursuant to 36 CFR §800.4(a) and 4(b), the City and County of Honolulu is moving forward with these four requested items and delivery to the SHPD in August 2017 is anticipated.

As part of the identification of historic properties effort, the City and County of Honolulu is moving forward with consultation efforts with Native Hawaiian Organizations (NHOs) [36 CFR §800.4(a)(4)] and consultation with individuals, organizations and the public with a demonstrated interest in the undertaking [36 CFR §800.2(c)] and will include documentation of the nature of the consultation, the names of the consulted parties, and their comments/concerns. Consultation regarding the Dowsett Highlands Relief Sewer Project is proposed with 25 Native Hawaiian Organizations or individuals summarized in the following table. Comment from the SHPD regarding the proposed consultation outreach is welcome.

Proposed Section 106 Consultation Outreach List

<table>
<thead>
<tr>
<th>Community Member/NHO</th>
<th>Affiliation</th>
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</thead>
<tbody>
<tr>
<td>Abigail Kawananakoa Foundation</td>
<td>Ali'i Trust involved in restoration of Mauna 'Ala</td>
</tr>
<tr>
<td>Aha Hui Malama O Kaniakapupu</td>
<td>Caretakers of Kaniakapupu</td>
</tr>
<tr>
<td>Charles Reed Bishop Trust</td>
<td>Ali'i Trust involved in restoration of Mauna 'Ala</td>
</tr>
<tr>
<td>Crabbe, Kamana'opono</td>
<td>OHA (Ka Pouhana)</td>
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Initial background historical research for this project (Belluomini et al. 2017, Shideler et al. 2017) indicates that this area of Nu’uanu Valley has had a rich history during both the pre-Contact and post-Contact periods. Land Commission Awards (LCAs) show the area was used for agriculture and for habitation during the mid-nineteenth century, in a pattern that may well have extended back in time for many centuries. Nu’uanu Valley has long been the main connection point between windward O’ahu and Honolulu. In the mid- to late 1800s the lands adjacent to the project APE featured homes of many of the leading families of O’ahu, including Queen Emma, Robert Creighton Wyllie, John H. Paty, and F.A. Schaefer. Many historic properties including the Kawānanakoa Playground, the Kyoto Gardens of Honolulu, Hānaiaikamalama (Queen Emma’s Summer Palace), Mauna ‘Ala (Royal Mausoleum), and numerous historic residences, have been identified adjacent to the APE. Belluomini et al. (2017) noted that potentially significant manhole covers and street markers were present,

<table>
<thead>
<tr>
<th>Community Member/NHO</th>
<th>Affiliation</th>
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</thead>
<tbody>
<tr>
<td>DaMate, Leimana</td>
<td>Executive Director, Aha Moku Advisory Committee for DLNR</td>
</tr>
<tr>
<td>Daughters of Hawai‘i</td>
<td>Caretakers of Hānaiaikamalama, now known as the Queen Emma Summer Palace</td>
</tr>
<tr>
<td>Ehrhorn, Chuck</td>
<td>Chair OIBC</td>
</tr>
<tr>
<td>Halau i Ka Wekili</td>
<td>Hula Hālau</td>
</tr>
<tr>
<td>Hawaiian Civic Club of Honolulu</td>
<td>Association of Hawaiian Civic Club</td>
</tr>
<tr>
<td>Hawai‘i Maoli</td>
<td>NHO</td>
</tr>
<tr>
<td>Hilo, Regina</td>
<td>SHPD, Burial Sites Specialist (O‘ahu)</td>
</tr>
<tr>
<td>Ka Pa Hula Hawai‘i</td>
<td>Hula Hālau</td>
</tr>
<tr>
<td>Ke One O Kakuhihewa</td>
<td>O‘ahu Council of the Association of Hawaiian Civic Clubs</td>
</tr>
<tr>
<td>Lunalilo Trust</td>
<td>Ali‘i Trust involved in restoration of Mauna ‘Ala</td>
</tr>
<tr>
<td>Ma‘a ‘Ohana c/o Lani Ma‘a Lapilio</td>
<td>NHO</td>
</tr>
<tr>
<td>Mauna ‘Ala Royal Mausoleum</td>
<td>Caretaker is Kai Maioho</td>
</tr>
<tr>
<td>Native Hawaiian Church</td>
<td>NHO</td>
</tr>
<tr>
<td>Napoleon, Nanette</td>
<td>O‘ahu Cemetery</td>
</tr>
<tr>
<td>O‘ahu Cemetery</td>
<td>Adjacent land owner</td>
</tr>
<tr>
<td>Queen Emma Hawaiian Civic Club</td>
<td>Association of Hawaiian Civic Club</td>
</tr>
<tr>
<td>Queen Emma Land Company</td>
<td>Ali‘i Trust involved in restoration of Mauna ‘Ala</td>
</tr>
<tr>
<td>Queen Liliuokalani Trust</td>
<td>Ali‘i Trust involved in restoration of Mauna ‘Ala</td>
</tr>
<tr>
<td>Rodrigues, Hinano</td>
<td>Cultural Historian/Acting History and Culture Branch Chief, DLNR-State Historic Preservation Division-Maui</td>
</tr>
<tr>
<td>Santos, Kaliko</td>
<td>Community Outreach Coordinator, OHA</td>
</tr>
<tr>
<td>Solis, Kaahiki</td>
<td>Cultural Historian (Oahu, Kauai, and Niihau)</td>
</tr>
</tbody>
</table>
but would not be affected by the proposed project. It was also noted that historic cemeteries may have once extended into the present day Nu’uanu Avenue.

Subsurface archaeological features or deposits associated with these previously identified historic properties, or other historic properties presently unknown, may be present within the project APE. An archaeological monitoring program will mitigate adverse impacts to subsurface historic properties.

A Selective Reconnaissance Level Survey (RLS) of the project area was conducted by Fung Associates, Inc. in order to properly identify, document, and address potential effects to any surface historic properties within the project area. Four bridges, three of which were determined eligible for listing on a historic register, two ‘auwai systems, and basalt curbstones were found in the survey area. However, the RLS determined that the historic properties would not be adversely affected by the proposed undertaking.

In addition, other types of historic properties identified within the RLS area include historic buildings, ‘auwai (ditches), and basalt curbstones. The RLS evaluation indicates that the proposed project will not adversely affect the historic buildings, bridges and/or ‘auwai, based on the projects confinement within the roadbeds. The RLS recommends that procedures for treatment of the basalt curbstones be developed prior to the commencement of work for the locations where the basalt curbstones will be disturbed.

Summary

On behalf of the EPA, the DOH requests the acknowledgement of the initiation of Section 106 consultation under the NHPA and concurrence with the APE. We ask that you review the information provided in this letter and respond with formal comments within 30 days of receipt of this letter to Ms. Sue Liu, via email to sue.liu@doh.hawaii.gov or by U.S. Postal Service to Ms. Sue Liu, Wastewater Branch, Hawaii Department of Health, 919 Ala Moana Blvd, Room 309, Honolulu, Hawaii, 96814. Please feel free to contact Ms. Sue Liu by telephone at 586-4294, if you have any questions.

Sincerely,

SINA PRUDER, P.E. CHIEF
Wastewater Branch

Attachments

cc: Mr. Wei Chen (via email at wchen@fukunagaengineers.com)
Mr. Scott Bellumini (via email at SBellumini@culturalsurveys.com)
Mr. David Shideler (via email at DShideler@culturalsurveys.com)
Ms. Shelle Silva (via email at shelle.silva@honolulu.gov)
Mr. Lance Fukumoto (via email at lfukumoto@fukunagaengineers.com)
Mr. Wynn Miyamoto (via email at wmiyamoto@fukunagaengineers.com)
Ms. Sue Liu (via email at sue.liu@doh.hawaii.gov)
References Cited

Belluomini, Scott A., Nicole Ishihara, David W. Shideler, and Hallett H. Hammatt
2017 Archaeological Literature Review and Field Inspection (LRFI) for the Dowsett Highlands and Relief Sewer Project, Nu'uanu Ahupua'a, Honolulu District, O'ahu, TMKs: [1] 1-7, 1-8, 1-9, and 2-2 (various plats and parcels). Cultural Surveys Hawai'i, Kailua, HI.

Shideler, David W., Gina M. Farley, and Hallett H. Hammatt
2017 Archaeological Monitoring Plan for the Dowsett Highlands Relief Sewer Project, Nu'uanu Ahupua'a, Honolulu District, O'ahu, TMKs: [1] 1-7, 1-8, 1-9, and 2-2 (various plats and parcels). Cultural Surveys Hawai'i, Kailua, HI.

State Historic Preservation Division


Attachments

Figure 1. Portion of the 1998 USGS Honolulu Quadrangle topographic map depicting the Area of Potential Effect (APE)

Figure 2. Aerial photo depicting the Area of Potential Effect (APE) (Google Earth 2013)


Figure 1. Portion of the 1998 USGS Honolulu Quadrangle topographic map depicting the Area of Potential Effect (APE)
Figure 2. Aerial photo depicting the Area of Potential Effect (APE) (Google Earth 2013)

May 26, 2017

Russell Y. Tsujii, Administrator
Land Division, Department of Land and Natural Resources
P.O. Box 621
Honolulu, HI 96809

Dear Mr. Tsujii:

SUBJECT: Chapter 6E-8 and National Historic Preservation Act (NHPA) Section 106 Review -- Pre-Assessment Consultation for Draft Environmental Assessment for the Dowsett Highlands Relief Sewer Project

Nu‘uanu Ahupua‘a, Honolulu (Kona) District, Island of O‘ahu

TMK: (1) 1-7, 1-8, 1-9, and 2-2

Thank you for the opportunity to consult and provide comments on this pre-consultation for a draft environmental assessment (DEA) for the Dowsett Highlands Relief Sewer Project. The State Historic Preservation Division (SHPD) received this submittal on April 27, 2017. The submittal indicates that preparation of the DEA is ongoing. The proposed project combines two City and County of Honolulu (CCH) wastewater hydraulic capacity upgrades. The combined project is to develop hydraulic capacity improvements to alleviate flow surcharge conditions which may potentially cause sanitary sewer overflow during wet weather events. The submittal specifies that this project will also receive federal funding, under the State of Hawaii, Department of Health (DOH), Clean Water State Revolving Fund Program (CWSRF).

The project improvements are described as follows: design and construction of approximately 14,500 linear feet of 8-inch to 24-inch diameter new gravity sanitary sewers. The main alignment is proposed to begin along Nu‘uanu-Pali Drive, follow along Pali Highway, Dowsett Avenue, Pali Highway and Nu‘uanu Avenue, and end at School Street. Branch sewers intercepting from existing mains are proposed along Wylie Street, Laimi Road, Pelekane Drive, Jack Lane and Ahi Place. Other improvements include localized relief and/or replacement sewers to address existing sewers with hydraulic capacity deficiencies not fully addressed by the proposed main relief sewer. These include short segments of sewers next to South Judd Street along Craigside Place, and the Pelekane Drive and Laimi Road sanitary sewer bridge crossings. Construction of the new relief sewers will utilize a combination of trenchless technologies (micro-tunneling) and open trenching.

On February 17, 2017, the SHPD reviewed a document titled, Chapter 6E-8, Request for a Historic Properties Determination, City and County of Honolulu, Ref. No. WW.CSE 15-125, Dowsett Highlands & Relief Sewer Project and an Archaeological Literature Review and Field Inspection (LRFI) for the Dowsett Highland Relief Project, prepared by Cultural Surveys Hawai‘i, Inc. (Belluomini et al., November 2015). The SHPD requested the following: (1) completion of an architectural reconnaissance level survey (RLS); (2) the opportunity for SHPD to review the 60% and 90% design plans of the project area; (3) completion of an archaeological monitoring plan (AMP); and (4) consultation with the SHPD prior to conducting the RLS. The SHPD accepted this document as supportive material designed to facilitate project planning and the historic preservation review process (February 17, 2017; Log No. 2015.04034, Doc. No. 1705SL09).

Per Chapter 6E-8 of Hawaii Revised Statutes, SHPD requests the following prior to project initiation:

- A completed RLS;
- An AMP meeting the requirements of HAR §13-279-4; and
- Consultation with SHPD architectural branch to discuss survey boundaries and the properties to be surveyed.
The SHPD will notify you when the required reports and plans have been accepted and project work may commence.

This submittal will require the State Historic Preservation Officer (SHPO) to review the proposed project under the National Historic Preservation Act (NHPA) Section 106 and its implementing regulation 36 CFR 800. The use of federal funding, from the Department of Health’s Clean Water State Revolving Fund Program (CWSRF), triggers the NHPA Section 106 process. Attached are steps that the applicant needs to address under NHPA Section 106:

(1) Name of the federal and state funding or licensing agency/agencies involved with this project. The State Historic Preservation Officer is required to respond to the federal agency or to the agency’s designated authority. Consultants contracted to prepare information, analyses, or recommendations are not recognized as a federally-delegated authority. Every project subject to section 106 has a federal funding, licensing, or permitting agency. Please include the name, address, and telephone number of the contact person/s at the federally delegated authority. A federal agency or federally delegated authority contact is mandatory pursuant to 36 CFR §800.2(a);

(2) A delegation letter from the federal agency that identifies the activities and responsibilities they have delegated to you on their behalf;

(3) Information documenting that the agency has evaluated and determined that the project constitutes an undertaking as defined in 36 CFR §800.16(y);

(4) Information indicating that a reasonable and good faith effort to identify historic properties (architectural, archaeological, or traditional cultural properties [TCPs]) within the area of potential effect (APE) pursuant to 36 CFR §800.4(a) and 4(b) has been completed. The identification effort must include consultation efforts with Native Hawaiian Organizations (NHOS) [36 CFR §800.4(a)(4)] and consultation with individuals, organizations and the public with a demonstrated interest in the undertaking [36 CFR §800.2(c)] and should include documentation of the nature of the consultation, the names of the consulted parties, and their comments/concerns; and

(5) A determination of eligibility and significance for any properties or potential historic districts within the APE [36 CFR §800.4(c)]; assessment of project effect [36 CFR §800.4(d)]; and if necessary resolution of adverse effects [36 CFR §800.6] for any sites located with the APE.

Per 36 CFR 800, SHPD looks forward to receiving a request from the lead federal agency or their delegated authority to initiate NHPA Section 106 consultation with SHPD on the proposed undertaking.

Please contact Ms. Jessica L. Puff at (808) 692-8023 or at Jessica.L.Puff@hawaii.gov for any architectural questions or concerns; Kaʻāhili Solis at (808) 692-8030 or at Shelleigh.Solis@hawaii.gov for questions or concerns regarding traditional Hawaiian cultural resources or consultation with NHOS, and Dr. Susan A. Lebo at (808) 692-8019 or at Susan.A.Lebo@hawaii.gov for questions or concerns regarding archaeological resources or this letter.

Aloha,

Alan S. Downer, PhD
Administrator, State Historic Preservation Division
Deputy State Historic Preservation Officer

cc: Lydia Morikawa, DLNR-Land (Lydia.M.Morikawa@hawaii.gov)
Lance Fukumoto, Fukunaga & Associates (office@fukunagaengineers.com)
Shelle Silva, CCH-DDC (Shelle.Silva@hospalulu.gov)
Sina Pruder, DOH (Sina.L.Pruder@doh.hawaii.gov)

March 27, 2017

Shelle Silva, P.E., Project Manager
Department of Design and Construction
Wastewater Division, Collection System Engineering Branch
City and County of Honolulu
650 South King Street, 14th Floor
Honolulu, Hawaii 96813
Shelle.silva@honolulu.gov

IN REPLY REFER TO:
Log No. 2015.04034
Doc. No. 1703SL21
Archeology

Dear Ms. Silva:

Archaeological Literature Review and Field Inspection for Dowsett Highlands Relief Sewer Project Nu‘uanu Ahupua‘a, Honolulu (Kona) District, Island of O‘ahu
TMK: (1) 1-7, 1-8, 1-9, and 2-2 (various plats and parcels)

Pursuant to your request, this letter clarifies the nature of the Selective Reconnaissance Level Survey (RLS) our division requested be conducted to identify, document, and address potential effects to surface architectural historic properties within the project area (SHPD letter dated February 17, 2017; Log No. 2015.04034, Doc. No. 1702SL09).

As indicated in our letter dated February 17, 2017, the SHPD received a letter dated November 5, 2015 requesting our division provide an historic properties determination for this City and County of Honolulu, Department of Design and Construction (DDC) project. In support of this determination, the DDC requested Fukunaga & Associates, Inc., and their subcontractor, Cultural Surveys Hawaii, Inc. (CSH), to prepare the enclosed documented titled, Archaeological Literature Review and Field Inspection for the Dowsett Highlands Relief Sewer Project Nu‘uanu Ahupua‘a, Honolulu District, Island of O‘ahu TMK: (1) 1-7, 1-8, 1-9, and 2-2 (various plats and parcels) (Belluomini et al., November 2015).

The project proposes to identify alternatives for a new relief sewer line which may be constructed by trench and/or trenchless technologies, depending on the geotechnical survey results. The project area is located on land owned by the State of Hawai‘i and the City and County of Honolulu. It totals approximately 43.0 acres and encompasses the Pali Highway from Nu‘uanu Pali Drive to Nu‘uanu Avenue at the Wyllie Street Interchange, concluding near School Street. Maps and text provided in Belluomini et al. (2015) indicate the project area also includes a number of roads centering on portions of the Pali Highway and Nu‘uanu Avenue.

The archaeological fieldwork consisted of a 100% coverage inspection of the project area to verify or confirm the location of previously identified sites, to identify any potential archaeological sites, and to investigate and assess the potential for the project impact to any previous or newly-identified sites. This survey identified potential historic properties within or near the vicinity of the project area including basalt stone curbs, ‘auwai (ditches), historic bridges, manhole covers, street markers, cemeteries and parks, and their locations are shown in two figures (Figures 40 and 41).

The LRFI report provides a comprehensive overview of the previous archaeological studies and historic properties that occur within or near the project area. Various portions of the project area have been included within previous archaeological studies but the entire project area has not been comprehensively surveyed.
Based on the LRFI report documentation, SHPD requests that an Selective Reconnaissance Level Survey of the project area is necessary prior to project work beginning in order to properly identify, document, and address potential effects to any surface historic properties within the project area. The RLS shall make a determination of eligibility and integrity assessment for individual historic properties and any potential historic district; and, if a potential district is present, the RLS must identify character defining features of the district, including significant architectural styles. The RLS also shall assess the significance of the rock walls found throughout the neighborhood. Prior to initiating the survey, the project proponent or its consultant must consult with the architecture branch to discuss the survey boundary and properties to be surveyed. In addition to the RLS, SHPD requests the following prior to initiation of project work:

- An opportunity for SHPD to review 60% and 90% design plans to ensure the project is designed to avoid adverse impact to the bridges, the cut basalt curb stones on Nuuanu Avenue, and the traditional Hawaiian ‘auvai noted along Laimi Road and the Dowsett Avenue area;
- Archaeological monitoring of all ground disturbing activity;
- Documentation of the potential historic properties identified during the literature review and field inspection (Belluomini et al. 2015) be completed during the archaeological monitoring program, to include a written description, location maps, an assessment of significance, and mitigation recommendations (if appropriate).

SHPD looks forward to reviewing and accepting both the RLS and an archaeological monitoring plan (AMP) meeting the requirements of HAR §13-279-4.

SHPD will notify you when these documents have been accepted and project work may commence.

Although Belluomini et al. (2015) document does not fulfill the requirements of an archaeological inventory survey as specified in HAR §13-276, it serves to facilitate project planning and supports the historic preservation review process. Please send one hardcopy of the document, clearly marked FINAL, along with a copy of this review letter via US mail, and a searchable pdf copy via email, to the Kapolei SHPD office, attention SHPD Library.

Please contact Jessica Puff, Architectural Historian, at (808) 692-8023 or at Jessica.L.Puff@hawaii.gov for any questions regarding architectural resources. Please contact me at Susan.A.Lebo@hawaii.gov or at (808) 692-8019 for any concerns regarding archaeological resources or this letter.

Aloha,

Susan A. Lebo, PhD
Archaeology Branch Chief

cc. Wei Chen, Fukunaga & Associates, Inc. (wchen@fukunagaengineers.com)
David Shideler, Cultural Surveys Hawai‘i, Inc. (dshideler@culturalsurveys.com)
Robert Kroning, C&C Honolulu, DDC (rkroning@honolulu.gov)
Harvey Chee, C&C Honolulu, DDC (hchee1@honolulu.gov)