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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