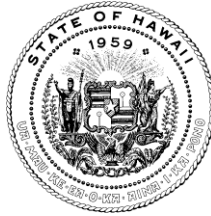


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COMMISSION LAND
STATE PARKS

April 8, 2019

Daniel E. Orodener
Executive Officer
Land Use Commission
Department of Business, Economic Development & Tourism
State of Hawaii
235 S. Beretania Street, # 406
Honolulu, HI 96813

IN REPLY REFER TO:
Log No. 2018.02114
2019.00690
Doc. No. 1904SL01
Archaeology

Dear Mr. Matsubara:

**SUBJECT: Chapter 6E-42 Historic Preservation Review –
LUC Docket No. A17-804/Hawaiian Memorial Life Plan, Ltd.
Hawaiian Memorial Park Cemetery Expansion Project
Archaeological Inventory Survey for Hawaiian Memorial Park
Kāneʻohe Ahupuaʻa, Koʻolaupoko District, Island of Oʻahu
TMK: (1) 4-5-003:001**

This letter provides the State Historic Preservation Division's (SHPD's) review of the revised archaeological inventory survey (AIS) report titled, *Archaeological Inventory Survey Report for Hawaiian Memorial Park, Kāneʻohe Ahupuaʻa, Koʻolaupoko District, Island of Oʻahu, TMK: (1) 4-5-003:001 (Thurman et al., March 2019)*. The SHPD received the original draft AIS report with the LUC application on September 9, 2018 (Log No. 2018.02114). SHPD previously received a EIS preparation notice on January 7, 2018 (Log No. 2018.0044) and a draft EIS on September 7, 2018 (Log No. 2018.02103). Following an email request on March 29, 2019 for revisions to the AIS report (Susan Lebo [SHPD] to Trisha Kehaulani Watson [Honua Consulting]), SHPD received the revised AIS (Log No. 2019.00690) via email on April 1, 2019 (Rosanna Thurman to Susan Lebo).

The property is privately owned by Hawaiian Memorial Life Plan, Ltd. The project area is approximately 53.45 acres. The proposed project is to expand the existing Hawaiian Memorial Park Cemetery, involving specific construction activities within two distinct portions of the project area, a 14.5-acre proposed Cultural Preserve (CP) in the northeast portion of the project area and expansion of the cemetery in the remaining 38.95-acre portion of the project area. Proposed project improvements within the CP include clearing of vegetation, creation of walking trails, and installation of interpretive signage. Project construction outside the CP includes mass earth moving to level the existing hillside, creation of an access driveway, installation of a drainage system, and landscaping. There is also discussion of adding a Hawaiian burial interment area. Ground disturbance within the proposed CP would extend to 0.9 meters deep (3 ft.) for removal of existing trees and vegetation, approximately 0.6 meters deep (2 ft.) for pounding-in signage posts, and shallow grading to create walking trails. Ground disturbance outside of the CP will include mass earth moving, ranging from 6 to 30 meters deep (20-100 ft.) at higher elevations of the hillside to level the area. To the extent necessary, the excavated soil will be redistributed within the project area. Drainage installation will utilize low areas of the project area.

The AIS was conducted on behalf of Hawaiian Memorial Life Plan, Ltd. It involved a 100% coverage pedestrian survey of the project area and excavation of two test pits (TU 1 and TU 2) and an exploratory excavation within a single historic property, Site 50-80-10-8241, a historic charcoal kiln. The AIS fieldwork included re-locating and

Mr. Matsubara
April 8, 2019
Page 2

further documenting 10 previously recorded sites and documenting 14 newly-identified sites. The previously identified sites include 8 within the CP: Kawa'ewa'e Heiau [Site 50-80-10-354], a historic charcoal kiln [Site 50-80-10-4683], traditional habitation complex [Site 50-80-10-4684], a traditional ceremonial stone enclosure [Site 50-80-10-6930], a traditional ceremonial area [Site 50-80-10-6931], a historic stone storage feature [Site 50-80-10-6932], a historic charcoal kiln [Site 50-80-10-6933], and a traditional agricultural complex [Site 50-80-10-7079]. Two previously identified sites were further documented outside the CP: a historic water retention terrace [Site 50-80-10-4680] and a traditional habitation complex [Site 50-80-10-4681]. The newly-identified sites outside the CP include historic dairy roads [Site 50-80-14-8228], a historic road segment [Site 50-80-10-8229], a historic 'auwai [Site 50-80-14-8230], an 'auwai with associated terraces [Site 50-80-10-8232], agricultural terrace remnants [Sites 50-80-10-8233, -8234, and -8237], a historic water retention terrace [Site 50-80-10-8236], possible habitation sites [Sites 50-80-10-8235 and -8238], and an earthen pit [Site 50-80-10-8239]. Within the CP, the AIS recorded additional features of Kawa'ewa'e Heiau [Site -354]; expanded Site -7079 to include several terrace remnants and a stone mound; and recorded Site 50-80-10-8240, a terraced drainage 'auwai. Two newly-identified sites occur on the southern border of the proposed CP, including a terraced 'auwai [Site 50-80-10-8231] and a historic charcoal kiln [Site 50-80-10-8241]. Both will be included within the boundaries of the proposed CP.

The AIS results support a project effect determination of "Effect, with agreed upon mitigation commitments" pursuant to HAR 13-284-7(2). The agreed upon mitigation commitments are: data recovery, preservation, and archaeological monitoring. No further work is recommended for six sites [Sites -4680, -8228, -8232, -8236, -8237] and for Feature A at Site -8233. They have been adequately documented. No further work is recommended for Site -8241, which will be included within the CP. Data recovery excavations are recommended for Site -8233 Feature B [modified outcrop], at Sites -8234, -8235, -8238, and -8239, and data recovery or preservation is recommended for Site -7079 [agricultural complex]. Preservation within the CP is recommended for Sites -354, -4683, -4684, -6930, -6931, -6932, -6933, -8231, -8240, and -8241. Preservation outside the CP includes Sites -4681, -8230, and -8235.

The revisions adequately address the issues and concerns identified in our previous correspondence. This AIS report satisfies the requirements of HAR §13-276-5. **It is accepted.** Please send one hard copy of the document, clearly marked FINAL, along with a text-searchable PDF version, to the Kapolei SHPD office, attention SHPD Library.

Pursuant to HAR §13-284-3, Steps (1) through (4) of the historic preservation review process are complete. The SHPD concurs that the survey identification efforts were adequate, agrees with the significance assessments, agrees with the project effect determination, and accepts the agreed upon mitigation in the form of data recovery for four sites, as well as Feature B at Site -8233; data recovery or preservation of Site -7079; preservation of 10 sites within the CP and 3 sites outside the CP; and archaeological monitoring during project work.

As stipulated in HAR §13-284-7, when SHPD comments that a project will result in "effect with agreed upon mitigation commitments," then detailed mitigation plans shall be developed for SHPD review and acceptance, prior to project work commencing. **SHPD looks forward to** receiving a data recovery plan (DRP) meeting the requirements of HAR §13-278-3, a preservation plan (PP) meeting the requirements of HAR §13-277, and an archaeological monitoring plan (AMP) meeting the requirements of HAR §13-279-4.

SHPD will notify the LUC when the DRP, PP, and AMP have been reviewed accepted and the permit issuance process may proceed.

Please contact Dr. Susan A. Lebo, Archaeology Branch Chief, at Susan.A.Lebo@hawaii.gov or at (808) 692-8019 for any concerns regarding archaeological resources or this letter.

Aloha,
Alan Downer

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

cc: Trisha Kehaulani Watson, Honua Consulting, watson@honuaconsulting.com
Rosanna Thurman, Honua Consulting and OASES, rosannathurman@gmail.com