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April 9, 2014

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LOG NO: 2014.1379
DOC NO: 1404MV06
Archaeology

Subject: **Chapter 6E-8 and National Historic Preservation Act Section 106 Review -
Archaeological Preservation Plan and Mitigation Plan Addressing 23 Historic Properties
Queen Ka'ahumanu Highway Widening, Phase 2
Kalaoa, O'oma, Kohanaiki, Kaloko, Honokohau 1-2 and Kealakehe Ahupua'a
North Kona District, Island of Hawai'i
TMK: (3) 7-4-008, 7-3-009 & 7-3-043 (portion)**

Thank you for submitting the plan titled *An Archaeological Preservation Plan and Mitigation Plan Addressing 23 Sites for the Proposed Queen Ka'ahumanu Highway Widening, Phase 2 Project Kalaoa, O'oma, Kohanaiki, Kaloko, Honokohau 1-2 and Kealakehe Ahupua'a North Kona District, Island of Hawai'i TMK: (3) 7-4-008, 7-3-009 & 7-3-043 (portion)* (H. Hammatt and D. Shideler), March, 2014. This plan was received by our office on March 28, 2014. The plan outlines amended site specific preservation measures for 23 historic properties located within the Queen Ka'ahumanu Highway corridor. An archaeological inventory survey report for the project area documented a total of 76 historic properties and provided treatment recommendations (Monahan et. al. 2012). This inventory survey and treatment recommendations were approved by SHPD in August 2012 (Log No 2012.1443, Doc No 1208MV01). The mitigation commitments were as follows:

Two sites will be subjected to separate burial treatment plans (Sites 22415 and 29275); 15 sites will be preserved with no additional field work (Sites 10154, 19943, 19950, 19951, 28780, 28781, 28788, 28789, 28790, 28792, 28797, 28799, 28802, 28806, and 28810); one site will receive a combination of no further work and preservation (19945); 11 sites will be avoided during construction and therefore subject to short term protection measures (28794, 28801, 28803, 28804, 28805, 28809, 29337, 29341, 29342, 29343, and 29347); two sites will receive no further work, but impacts will be monitored by an archaeologist (6432 and 29338); two sites will be relocated (19947 and 29346); one site will receive a combination of relocation and preservation (28808); 20 sites will receive data recovery excavation with no additional mitigation (19949, 22417, 28778, 28785, 28786, 28800, 28807, 28811, 28812, 28814, 28815, 29332, 29333, 29334, 29335, 9336, 29339, 29340, 29344, and 29345); 14 sites will be subjected to a combination of archival data recovery and partial preservation (00002, 10714, 15324, 18099, 19946, 19952, 19953, 19954, 22507, 28774, 28782, 28784, 28787, and 28791); one site will be subjected to a combination of archival data recovery, data recovery excavation and partial preservation (29272); one site will be subjected to archival data recovery only (22418); two sites will have data recovery through the collection and curation of portable artifacts (29348 and 29349); and three sites will be subjected to a combination of data recovery excavation and preservation (19948, 28783, and 28813).

Subsequently a mitigation plan was prepared to address the recommended treatments presented in the AIS (Shideler et. al. 2012), and this plan was accepted by SHPD (Log No. 2012.3052, Doc No. 1210MV25). However, the Federal Highways Administration (FHWA) initiated a redesign of the Phase 2 widening project in order to minimize the effects of this undertaking on historic properties. As a result of the redesign, 21 sites that were previously proposed to be directly impacted will now be avoided by construction activities. Nine of these sites are trails that were proposed to be partially destroyed, with mitigation in the form of archival research, and the undisturbed portion of the trail preserved (SIHP Sites 20-10-27-15324, 18099, 19946, 19954, 22418, 22507, 28774, 28782, and 29272). Eleven (11) sites were previously proposed to be all or partially destroyed by the highway widening, with data recovery excavation for 10 sites (SIHP Sites 19947, 19948, 19949, 22417, 28783, 28800, 28811, 29333, 29334, 29336, and 29344); and relocation for one site (SIHP 19947). As a result of the redesign, all 21 of these sites will be avoided by this undertaking. In addition, two sites that were outside of the project area and previously recommended for data recovery (SIHP 29339 and 29340) are now subject to interim protection measures.

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The agreement to avoid these sites was established via SHPD correspondence (Log No. 2013.4167, Doc No. 1307MV17). This agreement indicated that the treatment recommendations established in the Monahan et. al. (2012) AIS would be maintained, however the mitigation measures would be changed in order to preserve these 23 sites from any impact during project activities.

SHPD previously reviewed an amended preservation and data recovery plan that dealt with all 76 historic properties identified in the Monahan et. al. (2012) AIS. We requested that that the amended data recovery and preservation plan be abandoned and an addendum preservation/mitigation plan be prepared only for the sites whose mitigation commitments will change as a result of the redesign (Log No. 2013.4267, Doc No. 1310MV12). SHPD reviewed a second draft of the plan on January 21, 2014 and outlined several revisions that were needed in order to meet the standards of HAR 13-277 and the *Secretary of the Interior's Standards* for the treatment of historic properties (Log 2013.6921, Doc 1401MV05). Changes were subsequently made to this plan in response to the SHPD reviews of the previous drafts. SHPD now believes that the preservation plan will adequately protect the historic properties that it is intended to during construction. We also believe that the plan now makes reference to a reasonable and good faith effort to consult with Native Hawaiian Organizations.

This revised plan meets the standards of HAR 13-277 as well as the *Secretary of the Interior's Standards* for the treatment of historic properties and 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 on CD to the Kapolei SHPD office. We look forward to the opportunity to review the revised Memorandum of Agreement for this undertaking that that incorporates the terms of the addendum preservation plan.

Please contact Mike Vitousek at (808) 652-1510 or Michael.Vitousek@Hawaii.gov if you have any questions or concerns regarding this letter.

Aloha,



Theresa K. Donham
Deputy State Historic Preservation Officer
Historic Preservation Division