

AMENDMENT TWO TO THE
MEMORANDUM OF AGREEMENT
Among the
ADVISORY COUNCIL ON HISTORIC PRESERVATION
FEDERAL HIGHWAY ADMINISTRATION
AND THE
HAWAII STATE HISTORIC PRESERVATION OFFICER
Regarding the projects in the vicinity of the
District of North Kona, Island of Hawaii, State of Hawaii
which are known as the Queen Ka‘ahumanu Highway Intersection
Improvements for the Kaloko-Honokōhau National Historic Park
and the Queen Ka‘ahumanu Highway Widening, Kailua to Ke‘āhole

ATTACHMENT 6—SECRETARY OF INTERIOR GUIDELINES FOR TRAILS

STANDARDS FOR DOCUMENTATION

Research Design

The research design will define the proposed scope of the documentation work and define a set of expectations based on the information available prior to the research. Generally, the research design also ensures that research methods are commensurate with the type, quality, and source of expected information. The research design for a property should identify.

1. Evaluated significance of the property to be investigated.
 - a. The Māmalahoa Trail is evaluated as significant under A and D for the National Register, and under a, d, and e for HAR 13-275-6.
 - b. Historical, architectural, archaeological, or cultural issues relevant to the evaluated significance of the property.
 - c. Previous research on those issues and how the proposed work is related to existing knowledge.
 - d. The amount and kinds of information required to produce reliable historical analyses.
 - e. Methods to be used to obtain the information.
 - f. Types of sources to be investigated, types of personnel required.
 - g. Expected results or findings based on available knowledge about the property and its context; and
 - h. Relationship of proposed historical documentation to other proposed treatment activities.

Guidelines for the Treatment of Cultural Landscapes.

A trail is a type, as well as a part of a cultural landscape. Thus, we look to the NPS Treatment of Cultural Landscapes for guidance on preservation of this 2,500-foot portion of the Māmalahoa Trail.

The Standards are neither technical nor prescriptive but are intended to promote responsible preservation practices that help protect our Nation's irreplaceable cultural resources. They cannot be used to make essential decisions about which contributing features of a cultural landscape should be retained and which can be changed. But once a specific *treatment* is selected, the Standards can provide the necessary philosophical framework for a consistent and holistic approach for a cultural landscape project.

Things to consider in a cultural landscape:

1. Change and continuity. What elements of the trail change, and what elements stay the same? In our example, we might also want to consider the change going on around the trail as the needs of the society living in the area have changed.
2. Relative Significance in History. This is a piece of a much larger cultural landscape and an important lateral trail. Further, excellent examples and documentation of this trail exist across the street at the Kaloko-Honōkohau National Historic Park.
3. Geographical Context. This trail goes over extremely difficult terrain, as does most of the Māmalahoa. Likely one did not travel on this trail at noon, but in the morning or late afternoon. What elements of the geographical context lead to its design, materials, connecting trails?
4. Use. Historic, current, and proposed use of the trail must be considered. If one proposed use is to encourage walking on the trail, this can affect integrity and existing conditions. Nā Ala Hele can help to address how use affects historic trails. The current use of the trail is passive with no use. Historic use of the trail was as a non-motorized road. Thus pedestrians, people on horseback and people with horse-drawn carts all used this trail to travel from one place to another. What is the best use going forward?
5. Archaeological Resources. The Māmalahoa Trail is considered an archaeological resource.
6. Natural Systems. Despite being dry, the Kekaha area has a wealth of resources. How are the location, materials, and workmanship of the trail a reflection of the natural systems in which it is located? For example, why might the trail be located at this level, rather than closer to the ocean or further mauka?
7. Management and Maintenance. Management documentation should address ways to ensure routine management and maintenance do not affect the integrity of the resource.

8. Interpretation. There are many ways to interpret a site. In this case additional interpretation is located across the street. What is significant about this portion of the Māmalahoa Trail.

STANDARDS FOR PRESERVATION

The Standards will be applied taking into consideration the economic and technical feasibility of each project.

1. A property will be used as it was historically, or be given a new use that maximizes the retention of distinctive materials, features, spaces and spatial relationships. Where a treatment and use have not been identified, a property will be protected and, if necessary, stabilized until additional work may be undertaken.
2. The historic character of a property will be retained and preserved. The replacement of intact or repairable historic materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place and use. Work needed to stabilize, consolidate and conserve existing historic materials and features will be physically and visually compatible, identifiable upon close inspection and properly documented for future research.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. The existing condition of historic features will be evaluated to determine the appropriate level of intervention needed. Where the severity of deterioration requires repair or limited replacement of a distinctive feature, the new material will match the old in composition, design, color and texture.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

Preservation as a treatment

When the property's distinctive materials, features, and spaces are essentially intact and thus convey the historic significance without extensive repair or replacement; when depiction at a particular period of time is not appropriate; and when a continuing or new use does not require additions or extensive alterations, Preservation may be considered as a treatment.

Citations

Archeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines. Historical Documentation Guidelines. National Park Service.
https://www.nps.gov/history/local-law/arch_stnds_5.htm

Guidelines for the Treatment of Cultural Landscapes: Factors to consider when selecting an appropriate Treatment. National Park Service. <https://www.nps.gov/tps/standards/four-treatments/landscape-guidelines/factors.htm>

The Secretary of the Interior's Standards for the Treatment of Historic Properties. National Park Service. <https://www.nps.gov/tps/standards.htm>