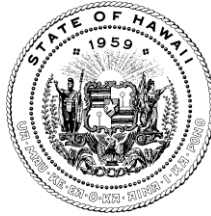


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January 21, 2022

Deepak Neupane, P.E., AIA
Executive Director
Hawaii Community Development Authority
547 Queen Street
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IN REPLY REFER TO:
Project No. 2017PR25234
Doc. No. 2201SL01
Archaeology

Dear Mr. Neupane:

SUBJECT: **Chapter 6E-42 Historic Preservation Review
Victoria Ward Ltd. (VWL) Block B Project
Request for Concurrence with 2-Step Verification Process
Honolulu Ahupua'a, Honolulu (Kona) District, Island of O'ahu
TMK: (1) 2-3-001:128**

The State Historic Preservation Division (SHPD) received a letter dated April 27, 2021 from the Hawaii Community Development Authority (HCDA) notifying our office that Victoria Ward Limited (VWL), proponent of the Block B project intends to submit an HCDA Development Permit Application and that prior to issuance of the permit, HCDA requires SHPD's concurrence with the project proceeding under a 2-step verification process, as defined in HAR §13-284-9(d)(1). SHPD received this letter on May 4, 2021 (Submission No. 2017PR25234.002) and subsequent follow-up correspondence requesting SHPD's review on October 13 and 25, 2021, and December 7, 15, and 20, 2021 (Submission Nos. 2017PR25234.003 through 2017PR25234.005).

HCDA's letter indicates that pursuant to HRS §6E-42, HAR §6E-43, and HAR §13-284-3(b)(1-5), Victoria Ward Limited (VWL) has completed the following five of the six historic preservation review procedural steps:

- (1) Identification and inventory to determine if historic properties are present and, if so, to identify and document them;
 - (2) Evaluation of significance;
 - (3) Effect determination;
 - (4) Mitigation commitments; and
 - (5) Detailed mitigation plan(s).
- (1) Identification and Inventory. The Block B Project has undergone multiple design modifications between 2014 and 2021. In 2014 and 2015, archaeological inventory survey (AIS) investigations were conducted for two properties in the Kakaako area part of VWL's Ward Neighborhood Master Plan: Block B East and Block B West. SHPD accepted the Block B East AIS (Pammer et al. 2014) on October 21, 2014 (Log No. 2014.04569, Doc. No. 1410SL25) and the Block B West AIS (Sroat et al. 2017) on August 15, 2017 (Log No. 2015.01784, Doc. No. 1708JA07).

Pursuant to HAR §13-284-3(b)(1), the Block B East AIS identified five historic properties:

- (1) 50-80-14-7655 (salt pans and associated berms);
- (2) 50-80-14-7656 (an isolated human cranial fragment found in reworked sand);

- (3) 50-80-14-7658 (a buried post-Contact surface including asphalt, concrete, coral and tar pavement, oil-rolled surfaces, and fence lines associated with development of the area;
- (4) 50-80-14-7659 (a portion of the concreted Ward Estate Ditch); and
- (5) 50-80-14-7660 (a historic refuse deposit within an abandoned drain line box).

Pursuant to HAR §13-284-3(b)(1), the Block B West AIS identified five historic properties:

- (1) 50-80-14-7655 (salt pans and associated berms);
 - (2) 50-80-14-7658 (a buried post-Contact surface including asphalt, concrete, coral and tar pavement, oil-rolled surfaces, and fence lines associated with development of the area;
 - (3) 50-80-14-7770 (two cultural deposits and 10 associated features);
 - (4) 50-80-14-7771 (a refuse deposit with pit-feature components); and
 - (5) 50-80-14-7772 (an isolated find of previously disturbed human remains).
- (2) Evaluation of Significance. Pursuant to HAR §13-284-3(b)(2), VWL provided the following site significance evaluations, HAR §13-284-6, which SHPD concurred with for the Block B East project area on October 21, 2014 (Log No. 2014.04569, Doc. No. 1410SL25):

Site 7655 is considered significant under Criteria “c” (excellent example of site type) and “d” (information content). Site 7656 is assessed as significant under Criteria “d” (information content) and “e” (significance to native Hawaiians), and Sites 7658 through 7660 are assessed as significant under Criterion “d” (information content).

Additionally, pursuant to HAR §13-284-3(b)(2), VWL provided the following site significance evaluations, pursuant to HAR §13-284-6, which SHPD concurred with for the Block B West project area on August 15, 2017 (Log No. 2015.01784, Doc. No. 1708JA07):

Site 7655 is considered significant under Criteria c and d. Sites 7658 and 7771 are significant under Criterion d, and Sites 7770 and 7772 are significant under Criteria d and e.

- (3) Effect Determination. Pursuant to HAR §13-284-3(b)(3), VWL provided the following project effect recommendation, which SHPD concurred with on October 21, 2014, for Block B East and on August 15, 2017, for Block B West (see above):

The project effect determination is “Effect, with proposed mitigation commitments.”

- (4) Mitigation Commitments. Pursuant to HAR §13-284-3(b)(4), SHPD concurred with the following agreed upon mitigation commitments on October 21, 2014, for Block B East and on August 15, 2017, for Block B West (see above):

- (1) Archaeological monitoring for the entirety of the project area. On-site archaeological monitoring will facilitate identification and appropriate documentation and/or treatment for all historic properties encountered during construction.
- (2) Site 50-80-14-7655 (data recovery)
- (3) Site 50-80-14-7656 (burial treatment)
- (4) Site 50-80-14-7658
- (5) Site 50-80-14-7659
- (6) Site 50-80-14-7660
- (7) Site 50-80-14-7770 (burial treatment)
- (8) Site 50-80-14-7771
- (9) Site 50-80-14-7772 (burial treatment)

No further work was recommended for Sites 7658, 7659, 7660, and 7771, which were all assessed as adequately documented.

- (5) Mitigation Plans. Pursuant to HAR §13-284-3(b)(5), VWL has completed, and SHPD has reviewed and accepted the following agreed-upon mitigation plans and/or documentation:

- (1) *Archaeological Data Recovery Plan for SIHP #50-80-14-7655, Ward Village Gateway Project (Block B East and Block C West), Kaka'ako, Honolulu Ahupua'a, Honolulu (Kona) District, O'ahu. TMK: (1) 2-3-001:005 (por.)* (Sroat and McDermott 2014) was reviewed and accepted by SHPD on November 19, 2014 (Log No. 2014.05179, Doc. No. 1411SL21).
 - (2) *Burial Treatment Plan for SIHP # 50-80-14-7656, Block B East Project, Kaka'ako Ahupua'a, Honolulu (Kona) District, O'ahu TMK: [1] 2-3-001:005 (por.)* (Sroat and McDermott 2014) was reviewed and accepted by SHPD on October 22, 2014 (Log No. 2014.04392, Doc. No. 1410.HR01).
 - (3) *Burial Site Component of a Preservation Plan for SIHP # 50-80-14-7656, Block B East Project, Kaka'ako Ahupua'a, Honolulu (Kona) District, O'ahu TMK: [1] 2-3-001:005 (por.)* (Sroat and McDermott 2014) was reviewed and accepted by SHPD on November 18, 2014 (Log No. 2014.04396, Doc. No. 1411RH01).
 - (4) *Archaeological Monitoring Plan for the Ward Village Gateway Project, Block B East and Block C West Project Areas, Kaka'ako, Honolulu Ahupua'a, Honolulu (Kona) District, O'ahu. TMK: (1) 2-3-001:005 (por.)* (Sroat and McDermott 2014) was reviewed and accepted by SHPD on November 18, 2014 (Log No. 2014.04818, Doc. No. 1411SL19).
 - (5) *Archaeological Monitoring Plan for the Block B West Project, Kaka'ako, Honolulu Ahupua'a, Honolulu (Kona) District, O'ahu, TMK: [1] 2-3-001:005 (portion)* (Farley and McDermott 2017) was reviewed and accepted on September 2, 2017 (Log No. 2017.01895, Doc. No. 1709SH01).
 - (6) *Burial Site Component of a Data Recovery and Preservation Plan for Iwi Kūpuna at SIHP # 50-80-14-7770 and SIHP # 50-80-14-7772 at the Howard Hughes Corporation's Block B West Project, Kaka'ako Ahupua'a, Honolulu (Kona) District, O'ahu, TMK: [1] 2-3-001:005 (por.)* (Reveal et al. 2017).
 - (7) *End of Fieldwork Report for Archaeological Data Recovery for the Ward Village Gateway Project (Block B East and Block C West), Kaka'ako, Honolulu Ahupua'a, Honolulu (Kona) District, O'ahu, TMK: [1] 2-3-001:005 (por.)* (Sroat 2017) was accepted on August 8, 2017 (Log No. 2017.01583, Doc. No. 1708JA03).
- (6) Verification of Completion. Pursuant to HAR §13-284-3(b)(6), VWL shall implement the following procedures and schedules to verify completion of the historic preservation review process:
- (1) Upon initiation of the accelerated 2-step verification process and receipt of a letter from the HCDA indicating that the HCDA Development Permit Application has been approved and that construction may proceed, with the understanding that HAR §13-284-9(d) Step 2 must be completed to conclude the historic preservation review process, VWL will initiate implementation of all pre-construction provisions of the SHPD-accepted archaeological monitoring plan (AMP). Additionally, a qualified archaeologist will monitor the installation of the interim protection measures and provide photographic documentation to SHPD verifying the protection measures have been properly implemented. Once construction has commenced, VWL will conduct archaeological monitoring fieldwork following the SHPD-accepted AMPs for Block B East and Block B West.
 - (2) Upon completion of Block B East and West construction, the archaeological monitoring report (AMR) and archaeological data recovery report (DRR) will be completed and submitted to the SHPD for review and acceptance within 6 months after completion of archaeological monitoring. The DRR is currently being written in tandem with the associated DRR for VWL's Block I project, which also addresses SIHP # 50-80-14-7655.
 - (3) When determined adequate, the SHPD will, in accordance with HAR §13-284-9(d)(2) Step 2, write a letter stating that the AMR and DRR are accepted and that the historic preservation process is concluded.

Based on the above, SHPD indicates that it has reviewed and commented on the effect of the proposed project pursuant to HRS §6E-42 and HAR §13-284-3; that it is SHPD's determination that VWL has completed Steps 1 through 5 pursuant to HAR §13-284-3(b)(1-5); and that **SHPD concurs** with HCDA's request for the project to proceed under the 2-step verification process detailed in HAR §13-284-9(d) and with the procedures and schedule VWL has proposed to complete Step 6 (verification of completion) per HAR §13-284-3(b).

Please contact Susan A. Lebo, Archaeology Branch Chief, at Susan.A.Lebo@hawaii.gov for any matters regarding this letter.

Mr. Neupane
January 21, 2022
Page 4

Aloha,

Alan Downer

Alan S. Downer, PhD

Administrator, State Historic Preservation Division

Deputy State Historic Preservation Officer

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