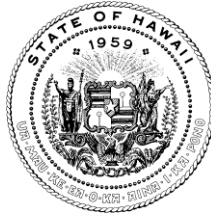


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**STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES**

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KAHOOLAWE ISLAND RESERVE COMMISSION  
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STATE PARKS

July 9, 2019

Aedard Los Banos, Executive Director  
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IN REPLY REFER TO:  
Log No. 2019.01133  
Doc. No. 1907AM05  
Archaeology

Dear Mr. Los Banos:

**SUBJECT: Chapter 6E-42 Historic Preservation Review –  
Ward Village Gateway Project (Block B East and Block C West)  
Block C West project, Kaka‘ako  
Honolulu Ahupua‘a, Honolulu (Kona) District, Island of O‘ahu  
TMK: (1) 2-3-001:130 por. and 131**

This letter provides the State Historic Preservation Division's (SHPD's) review of the letter dated May 17, 2019, from the Hawaii Community Development Authority (HCDA) which (1) states that the SHPD has had an opportunity to review and comment on the effect of the proposed Victoria Ward, Ltd. (VWL) Block C West project on historic properties, pursuant to Hawai'i Revised Statutes (HRS) §6E-42 and Hawai'i Administrative Rules (HAR) §13-284; and thus HCDA (2) requests SHPD's determination that VWL has met the respective requirements as set forth in HRS §6E-42 and HRS §6E-43 and HAR §13-284-3(b) Steps 1-5 and that VWL has set forth a process to comply with HAR §13-284-3(b) Step 6 and HAR §13-284-9(d). The SHPD received this letter on May 17, 2019.

The Block C West project has undergone multiple design modifications between 2014 and 2019. The original Block C West project comprised a 2.2-acre project area. It was subsequently subsumed, along with the adjacent Block B East, into a new 4.4-acre project, designated the Ward Village Gateway project. Based on multiple factors, the Block C West Project and Block B East Project have been redesigned with the new 2.2-acre Block C West project area boundaries matching the original project area.

Pursuant to HRS §6E-42 and HAR §13-284-3(b)(1-5), 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).

The SHPD accepted the Block C West archaeological inventory survey (AIS) report on October 20, 2014 (Log No. 2014.04570, Doc. No. 1410SL22). As a result, Steps 1-4 of the historic preservation review procedural steps were completed pursuant to HRS §6E-42.

- (1) Identification and inventory. Pursuant to HAR §13-284-3(b)(1), the AIS conducted within the boundaries of the Block C West project identified and documented two historic properties:
  - a. Site # 50-80-14-7655 consists of subsurface historic salt pan remnants, documented as laminated organic material and associated man-made berms. The historic property reflects land-use activities related to historic salt production.
  - b. Site # 50-80-14-7658 consists of buried historic surfaces, including asphalt, concrete, coral and tar pavement, oil-rolled surfaces, and fence-lines associated with the historic development of the project area.
- (2) Evaluation of significance. In the Block C West AIS report, historic properties were assessed as significant per HAR §13-284-6 Criteria a-e.

Pursuant to HAR §13-284-3(b)(2), VWL provided the following site significance evaluations for the historic properties within the Block C West project area:

- a. Site # -7655 was assessed as significant under criteria c and d; and
- b. Site # -7658 was assessed as significant under criterion d.

The SHPD concurred with these site significance evaluations in its acceptance letter of the Block C West AIS report, dated October 20, 2014 (Log No. 2014.04570, Doc. No. 1410SL22).

- (3) Effect determination. Pursuant to HAR §13-284-3(b)(3), VWL provided an effect recommendation of “effect, with agreed upon mitigation commitments.” The SHPD concurred with this recommendation on October 20, 2014 (Log No. 2014.04570, Doc. No. 1410SL22).
- (4) Mitigation commitments. Pursuant to HAR §13-284-3(b)(4), VWL proposed the following mitigation commitments:
  - a. In consultation with the SHPD, it was determined that an archaeological data recovery program would be an appropriate mitigation for the historic salt pan remnants Site # -7655, located within the central and mauka portions of the project area.
  - b. In order to mitigate the potential adverse impact to impact to Site # -7655 and Site # -7658, or any as yet unidentified cultural resources within the project area, a program of on-site archaeological monitoring was recommended for all subsurface project construction activities within the Block C West project area.

The SHPD concurred with VWL’s mitigation commitments on SHPD on October 20, 2014 (Log No. 2014.04570, Doc. No. 1410SL22).

- (5) Detailed mitigation plan(s). Pursuant to HAR §13-284-3(b)(5), VWL has completed, and SHPD has reviewed and accepted, the following agreed-upon mitigation plans:
  - a. Archaeological Data Recovery Plan (DRP) 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.); SHPD accepted DRP in letter dated November 19, 2014 (Log No. 2014.05179, Doc No. 1411SL21).
  - b. Archaeological Monitoring Plan (AMP) for the Ward Village Gateway Project, Blocks B East and C West, Kaka’ako, Honolulu Ahupua’a, Honolulu (Kona) District, O’ahu, TMK: [1] 2-3-001:005 (por.); SHPD accepted AMP in letter dated November 18, 2014 (Log No. 2014.04818, Doc No. 1411SL19).
  - c. Burial Treatment Plan (BTP) for human skeletal remains found in SIHP # 50-80-14-7656, Block B East, Ward Village Gateway Project, Kaka’ako, Honolulu Ahupua’a, Honolulu (Kona) District, O’ahu, TMK: [1] 2-3-001:005 (por.); SHPD accepted BTP in letter dated November 18, 2014 (Log No. 2014.04396, Doc No. 1411RH01).

With the acceptance of the DRP and the AMP, VWL has completed HAR §13-284-3(b), Step 5, consisting of detailed mitigation plans to carry out the mitigation commitments. Additionally, on August 8, 2017, the SHPD accepted the End of Fieldwork Letter Report for Archaeological Data

Recovery for the Ward Village Gateway Project (Block B East and Block C West), in a letter dated 8 August 2017 (Log No. 2017.01583, Doc No. 2017.01583).

VWL provided in their letter dated April 24, 2019 (Log No. 2019.01133) a plan that specified the process to be implemented to comply with HAR §13-284-3(b)(6), verification of the detailed mitigation plans and requested, through its agency the Hawaii Community Developmental Authority (HCDA), the accelerated, 2-step verification process outlined in HAR §13-284-9(d).

- (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:
- a. Upon initiation of the accelerated 2-step verification process and receipt of a letter from the SHPD, agreeing that Steps 1-5 of the historic review process have been completed, 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 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 AMP.
  - b. Upon completion of Block C West construction, the AMR and ADRR will be completed and submitted to the SHPD for review and acceptance within 6 months after completion of monitoring. The ADRR is currently being written in tandem with the associated ADRR for VWL's Block I project, which also addresses SIHP # 50-80-14-7655.
  - c. 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 ADRR 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 the procedures and schedule VWL has proposed to complete Step 6 (verification of completion) per HAR §13-284-3(b).

Please contact Andrew McCallister, Historic Preservation Archaeologist III, at [Andrew.McCallister@hawaii.gov](mailto:Andrew.McCallister@hawaii.gov) or at (808) 692-8015 for matters regarding archaeological resources or this letter.

Aloha,

***Alan Downer***

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

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