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May 9, 2023

Craig K. Nakamoto, Executive Director
Hawai'i Community Development Authority
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IN REPLY REFER TO:
Project No. 2019PR30462
Doc. No. 2305SCH05
Archaeology

Ms. Dawn Takeuchi-Apuna, Director
Department of Planning and Permitting
City and County of Honolulu
Frank F. Fasi Municipal Building
650 S. King Street, 7th Floor
Honolulu, Hawai'i 96813
c/o Clint Young
clint.young@honolulu.gov

Dear Mr. Nakamoto and Ms. Dawn Takeuchi-Apuna:

**SUBJECT: Chapter 6E-42 Historic Preservation Review
Request to Support HCDA Proceeding with Permitting Process
Victoria Ward Limited (VWL) Block N West Makai Project
Honolulu Ahupua'a, Honolulu (Kona) District, Island of O'ahu
TMK: (1) 2-3-002:116 por.**

This letter provides the State Historic Preservation Division's (SHPD's) review regarding the Hawaii Community Development Authority's (HCDA's) planned development permitting process for the Victoria Ward, Ltd. (VWL) and The Howard Hughes Corporation (HHC) project titled Victoria Ward Limited (VWL) Block N West Makai Project. This private project is subject to permitting under HCDA's 2005 Mauka Area Rules, and with permitting by the City and County of Honolulu, Department of Planning and Permitting (DPP).

SHPD has no objection to the HCDA proceeding with their permitting process for the *Victoria Ward Limited (VWL) Block N West Makai Project*, with the following stipulations:

1. HRS §6E-42 Historic Preservation Review Steps 1 through 5, as outlined in HAR §13-284-3(b), shall be completed and SHPD shall provide a letter documenting said completion to HCDA, DPP, and VWL/HCC indicating that the DPP permit process may continue;

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2. DPP commits to stipulate as a permit condition on all project DPP permits involving ground disturbing work that project initiation may not proceed prior to receipt by HCDA, DPP, and VWL/HHC of SHPD's letter documenting completion of Steps 1 through 5; and
3. VWL/HHC commits to no initiation of project ground disturbing work requiring a DPP permit prior to receipt of SHPD's letter documenting completion of Steps 1 through 5.

VWL/HHC has submitted draft documents to SHPD for review in support of HAR §13-284-3(b) Steps 1–5. At this time, SHPD has not completed review of the project documents. The project's current draft archaeological inventory survey (AIS) report, prepared by Cultural Survey's Hawai'i, Inc. (CSH) will be revised to include additional AIS testing locations and results due to recent changes in the project description and project area boundaries. The additional AIS fieldwork will be incorporated into a revised AIS report which will be submitted to SHPD for review and acceptance prior to project initiation. SHPD looks forward to receiving the revised documents when completed. The Attachment provides a brief project summary.

SHPD requests HCDA, DDP, and VWL/HHC each provide a written commitment to the requested stipulations to SHPD to HICRIS Project No. 2019PR30462 using the Project Supplement option.

SHPD will notify HCDA, DDP, and VWL/HHC when our office has completed review and approval of all documents submitted in support of HAR §13-284-3(b) Steps 1–5, and the DPP permitting process may continue.

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

Aloha,

Alan Downer

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

cc: Ka'iulani Sodaro (HHC): kaiulani.sodaro@howardhughes.com
Matt McDermott (CSH): mmcdermott@culturalsurveys.com

Attachment: Brief Project Summary

The Block N West Makai project (HICRIS Project No. 2019PR30462) is within the central portion of the current Ward Gateway Center. It is bounded to the northwest by Ward Avenue, to the southwest by the Block H project area (the Park at Ward Village residential tower; construction ongoing), to the southeast by the Block N East project area (the 'A'ali'i residential tower), and the northeast by the planned Honolulu Rail Transit Project (HRTTP) City Center corridor (the current Ward Gateway Center).

The Block N West Makai project is a discrete project within VWL's 60.5-acre (24.5-hectare) Ward Neighborhood Master Plan, a long-range development plan of 20-plus years expected to evolve over time to fulfill the needs of the community. It follows guidelines set forth in the Mauka Area Plan of the HCDA.

As HHC's Ward Neighborhood development proceeds, planning moves from the general ideas of the master plan to the specifics of individual development projects. Redesign of certain development block boundaries and their proposed build-outs are sometimes needed to better suit the actual development landscape based on the results of post-master plan studies and new information.

The Block N West Makai project was originally designated the Block N West project. Redesign of the Block N West project area subsequently added approximately 1.07 acres to the northeast of the original project area, separated from the original project area by the Honolulu Rapid Transit Project (HRTP) Section 4 (City Center) project corridor. The original Block N West project area, located on the *makai* (seaward) side of the HRTP corridor, was renamed the Block N West Makai project, and the new 1.07-acre *mauka* (inland) portion was named the Block N West Mauka project.

SHPD accepted the draft archaeological inventory survey plan (AISP) titled *Archaeological Inventory Survey Plan for the Block N West Project, Kaka'ako Ahupua'a, Honolulu (Kona) District, O'ahu TMK (1) 2-3-002:00559 (portion)* (Burke et al. 2015) May 29, 2015 (Log No. 2015.01594, Doc. No. 1505GC03). The AISP encompassed the original Block N West project area. SHPD received the draft AIS report titled *Archaeological Inventory Survey Report for the Block N West Makai Project, Kaka'ako, Honolulu Ahupua'a, Honolulu (Kona) District, O'ahu, TMK: [1] 2-3-002:059 (por.)* (Farley et al. 2019) to the SHPD on 23 May 2019 (Log No. 2019.01201, HICRIS Project No. 2019PR30462). This draft AIS report for the original Block N West Makai project area remains under SHPD review.

Subsequent to SHPD's receipt of the draft AIS report for the Block N West Makai Project, the project area has been redefined and expanded from 0.5 to 1.84 acres, to satisfy the Board of Water Supply requirements for water service to the proposed development. The Block N West Makai project area now includes portions of the adjacent Honolulu Rapid Transit Project (HRTP) Section 4 (City Center) project area, the Block I project area, Block N East project area, Block H project area, and Block N West Mauka project area (Table 1 and Figure 1).

At this time, CSH is revising the Block N West Makai AIS reporting, which will include the new project area, result of all prior AIS investigations with the new project area, as well as additional AIS testing.

Table 1. Project areas within the revised Block N West Makai project area

Project Name	Study Type	SHPD Report Acceptance Date
HRTP Section 4	AIS, Supplemental AIS	8/26/2013; 4/1/2015
Block I	AIS	6/12/2015
Block N East	AIS	9/6/2016
Block H	AIS	1/19/2018
Block N West Mauka	AIS	N/A; submitted 11/16/2017
Block N West Makai (original project area)	AIS	N/A; submitted 5/23/2019

Based on extensive AIS testing during previous studies and the original Block N West Makai AIS, the revised Block N West Makai project area contains four historic properties (Figure 2):

- SIHP 50-80-14-07249 consists of pre- to post-Contact cultural deposits including numerous features (fire pits, post-holes, pit features of indeterminate function, and human burials). It is assessed as significant under Criterion d and e pursuant to HAR §13-284-6.
- SIHP 50-80-14-07655 consists of historic salt pan remnants. It is assessed as significant under Criterion c, d, and e pursuant to HAR §13-284-6.
- SIHP 50-80-14-07659 consists of the concretized Ward Estate *'auwai*. It is assessed as significant under Criterion d pursuant to HAR §13-284-6.
- SIHP 50-80-14-07686 consists of Twentieth century infrastructure remnants including a culturally enriched crushed coral reclamation fill A horizon, oil-rolled surfaces, trash pits, and foundation remnants. It is assessed as significant under Criterion d pursuant to HAR §13-284-6.

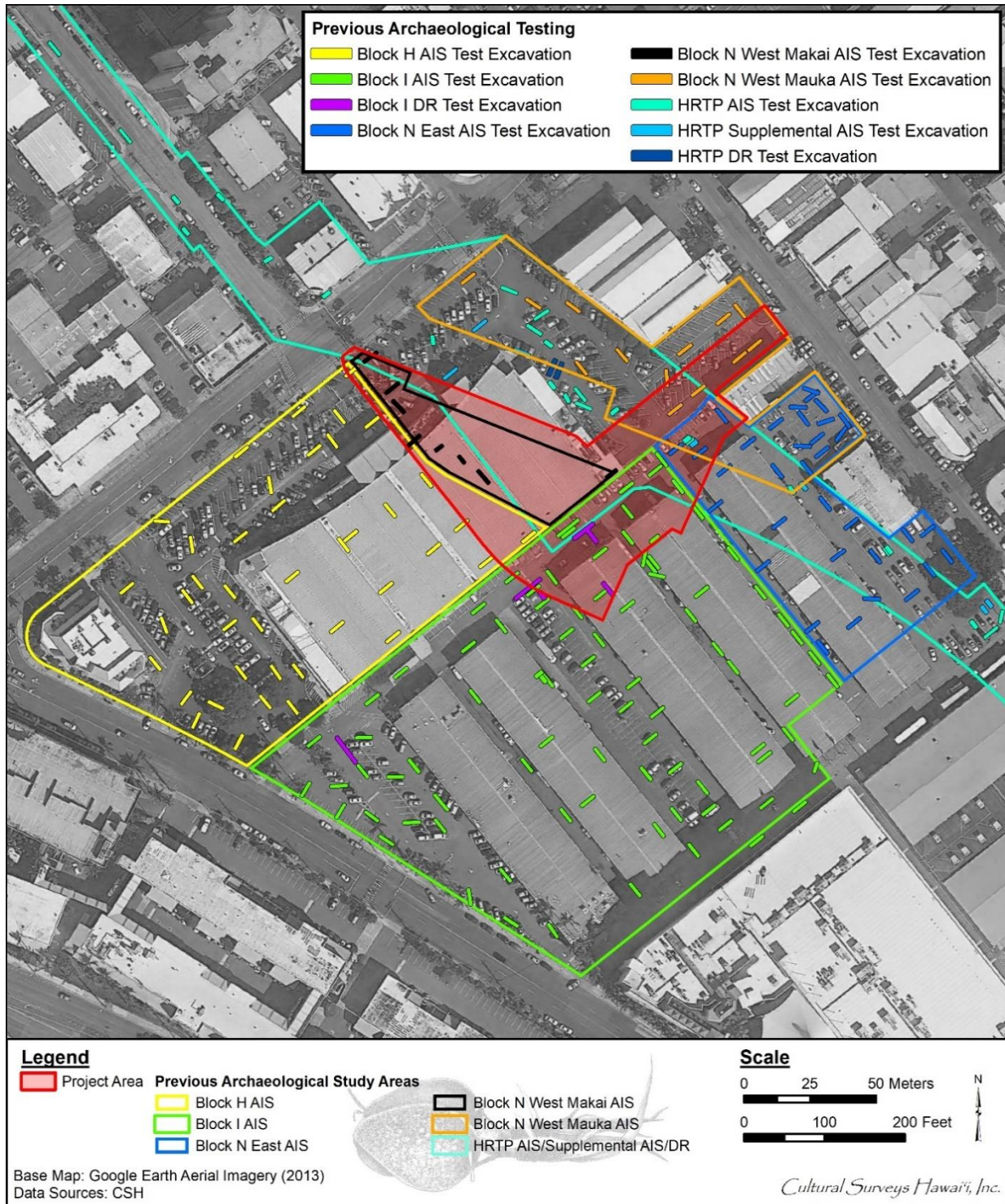


Figure 1. Aerial photograph (Google Earth 2013) showing completed AIS test excavations in the project area vicinity, the redesigned Block N West Makai project area (red), and original Block N West Makai project area (black), as well as the Block H, Block I, Block N East, Block N West Mauka, and H RTP Section 4 project areas, which are partially within the redesigned Block N West Makai project area.

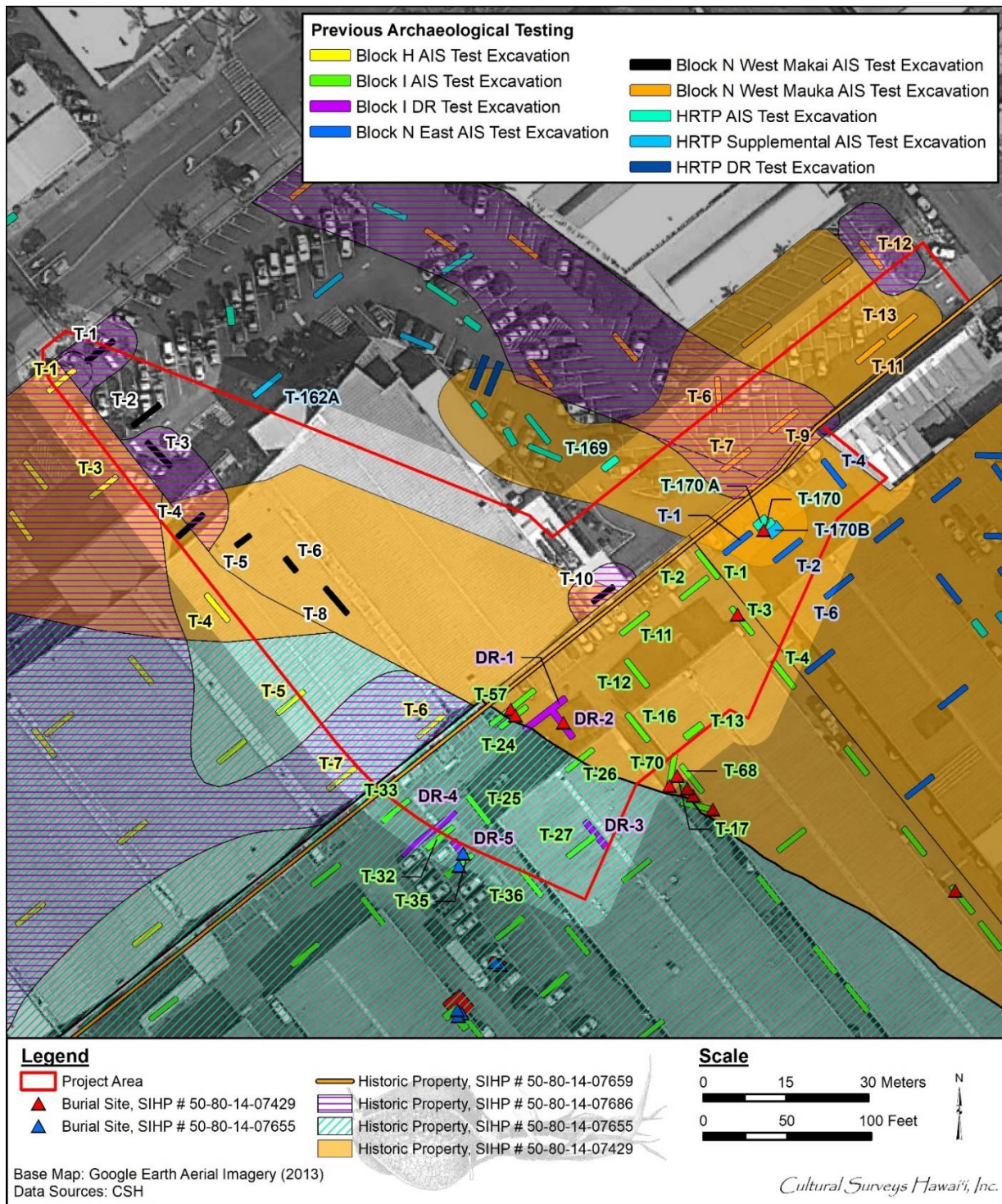


Figure 2. Aerial photograph (Google Earth 2013) showing the historic properties identified within, and in the immediate vicinity of the project area; SIHP 50-80-14-07659, the concretized Ward Estate 'auwai; SIHP 50-80-14-07686, subsurface infrastructure remnants; SIHP 50-80-40-07655, historic salt pan remnants; and SIHP 50-80-14-07429, subsurface cultural deposits.