

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA

STATE HISTORIC PRESERVATION DIVISION
KAKUHIHEWA BUILDING
601 KAMOKILA BLVD, STE 555
KAPOLEI, HAWAII 96707

DAWN N.S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

RYAN K.P. KANAKA'OLE
FIRST DEPUTY

DEAN D. UYENO
ACTING DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE
MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES
ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

March 27, 2023

IN REPLY REFER TO:
Project No.: 2022PR00692
Doc. No.: 2403JLP03
Architecture, Archaeology

Dawn Takeuchi-Apuna, Director
Department of Planning and Permitting (DPP)
City and County of Honolulu
650 South King Street
Honolulu, Hawai'i 96813
c/o Ryan Mori
ryan.mori@honolulu.gov

Dear Dawn Takeuchi-Apuna:

**RE: Hawaii Revised Statutes (HRS) Chapter 6E-42 Historic Preservation Review
After-the-Fact Review**

Dreamhouse (Former Facility 77 Mess Hall), Parcel 03, 91-1245 Franklin D. Roosevelt Avenue, Kalaehoa,; Building 152 & 153 (Quonset Hut), Parcel 10, 91-1057 Enterprise Avenue, Kapolei; and, Buildings 476-477 (Warehouses), Parcel 15, 91-1761 Midway Road, Kapolei
DPP Permit Numbers: A2021-02-0386; A2022-02-0158; A2022-02-0159
Owner Name: HUNT Communities Hawaii LLC and HUNT Companies
TMK: (1) 9-1-013:128; (1) 9-1-013:097; and (1) 9-1-013:081

The Hawaii State Historic Preservation Division (SHPD) received a submittal for projects at various HUNT Communities Hawaii LLC and HUNT Companies (HUNT) properties. Three of the projects were previously completed without being reviewed by SHPD as required pursuant to HRS Chapter 6E-42. Additionally, one (1) Hawaii Community Development Authority (HCDA) permit and two (2) City and County of Honolulu Building Permit Applications were submitted for SHPD review, in accordance with HRS Chapter 6E-42. SHPD also received an unsolicited archaeological monitoring plan (AMP) for review and acceptance.

The three projects submitted to SHPD for "After-the-fact" review are:

- (1) Adaptive Reuse of "Dreamhouse" (Former Facility 77 Mess Hall), Parcel 03, 91-1245 Franklin D. Roosevelt Avenue, Kalaehoa, TMK: (1) 9-1-013:128. Scope of work included alteration and subdivision of interior spaces within an existing building to support a charter school that would result in the removal of historic and non-historic building materials and features, alteration of

EXHIBIT E

the original fenestration pattern, and new electrical, HVAC, plumbing, and fire suppression systems.

- (2) Alterations to Building 152 & 153 (Quonset Hut), Parcel 10, 91-1057 Enterprise Avenue, Kapolei, TMK: (1) 9-1-013:097. The scope of work included removing refrigeration system, fire suppression system, freezers, restrooms, interior storage, prep areas, electrical, ductwork, and interior walls to combine spaces. Also includes excavation to verify the line size, condition, and invert of the existing sewer line with subsequent plumbing work to connect new lines (water, sewer, etc.) as well as installation of new plumbing and restroom fixtures (ADA compliant), water cooler, venting, piping, drains, fire suppression system (sprinkler heads and piping), electrical wiring and fixtures, and new HVAC ductwork and exhaust air register.
- (3) Rehabilitation of Buildings 476-477 (Warehouses), Parcel 15, 91-1761 Midway Road, Kapolei, TMK: (1) 9-1-013:081. Scope of work included removal of interior plywood from interior and exterior walls, removal of existing sliding barn doors and hardware, rebuilding barn doors and frames, salvage and refurbish door hardware and panels to match tongue and groove siding, removal and replacement of exterior corrugated metal siding with painted wood tongue and groove siding to match, new lighting fixtures, removal and replacement of existing corrugated roof, replace wood window framing to match existing.

SHPD has reviewed the previously completed work for the projects noted above and agrees with the historic properties assessments and determinations of effect made by Mason Architects in a letter dated, June 2, 2022. These determinations are as follows:

- a) All three properties are significant historic resources eligible for listing in the Hawaii and National Registers of Historic Places.
- b) The rehabilitation of Buildings 476-477 (Warehouses) follows SOI standards and best preservation practices. **SHPD concurs** with the determination of "no historic properties affected." However, the General Note on one of the drawings from the permit set indicates that "all work shall comply with historic building applicable laws..." yet, SHPD was not consulted, until after the work was completed, pursuant to HRS Chapter 6E-42.
- c) The alterations to Building 153 & 152 (Quonset Hut), do not entirely follow SOI Standards and best preservation practices. **SHPD concurs** with the determination of "Effect, with agreed upon mitigation commitments." **SHPD also agrees** with the proposed mitigation. HUNT will complete a Historic American Building Survey (HABS) of Building 153 & 152 to include 5 photos and a written report. However, **SHPD requests** that HUNT include historic photos of the Quonset Hut, as alterations to the building have already been made and HABS documentation is required prior to work being completed. Please submit the HABS documentation to the National Park Service as a donation once it has been completed and approved by SHPD.
- d) The adaptive reuse Dreamhouse (Former Facility 77 Mess Hall) into a charter school does not entirely follow SOI Standards and best preservation practices. **SHPD concurs** with the determination of "Effect, with agreed upon mitigation commitments." However, **SHPD cannot agree** with the proposed mitigation at this time. The proposed mitigation includes, "a website that would provide students, residents of Wakea Garden Apartments, and visitors with the history and historical photographs of the buildings, NASBP and the Cold War era." Such websites require continued maintenance and knowledge of their existence in order to be accessed and enjoyed by the public. The proposed mitigation for Facility 77 could be appropriate provided

that the website include a maintenance plan and guaranteed accessibility for the duration of the property's use as a charter school. A more sustainable option may be to install interpretive signs/panels at the property, along sidewalks/walking paths, play areas, fencing, or within the buildings, etc. **Please provide SHPD** with an amended mitigation proposal for Facility 77 that includes commitments to maintain a website or alternative to the proposed mitigation that is more visible/accessible to users and visitors of the property.

The project that has not yet been completed, for which SHPD received one (1) HCDA permit and two (2) City and County of Honolulu Building Permit Applications, is located at Buildings 153 & 152 (Quonset Hut). The scope of work includes installation of new fire alarms, fire sprinklers, new lighting, electrical, a/c, new plumbing fixtures throughout the interior, new roll up door, removal of portion of Fire Riser Room, and a new door within north elevation wall with overhang and landing addition; City and County of Honolulu Building Permit Applications A2022-02-0158 and A2022-02-0159. **SHPD concurs** with the determination of "Effect, with agreed upon mitigation commitments." **SHPD agrees** that HABS documentation will suffice as mitigation for both projects at Buildings 153 & 152. Lastly, **SHPD requests** archaeological monitoring be conducted for identification purposes during all ground disturbing work.

The Attachment identifies the issues and concerns that need to be addressed prior to SHPD's acceptance of the AMP as meeting the minimum requirements of HAR 13-279-4. Please highlight all revisions in text, and submit revised AMP along with a summary of the revisions made and the page on which they occur, to HICRIS Project No. 2022PR00692 using the project Supplement option.

SHPD shall notify DDP and HCDA when the AMP is accepted, and the permit issuance process may continue to Permit Applications A2020-0200158 and A2022-02-0159.

Please contact Jessica Puff, Architecture Branch Chief, at (808) 692-0815 or at Jessica.Puff@hawaii.gov for any changes in project area or scope or any concerns regarding architectural resources and documentation, and contact Susan A. Lebo, Archaeology Branch Chief, at (808) 321-9000 or at Susan.A.Lebo@hawaii.gov for any matters regarding archaeological resources.

Aloha,
Alan Downer

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

cc: Craig K. Nakamoto, HDCA, craig.k.nakamoto@hawaii.gov
Michael Kat, DPP, michael.kat@honolulu.gov
Kathleen Iriarte, kathleen.iriarte@huntcompanies.com
Polly Tice, pt@masonarch.com
Trisha Watson, watson@honuaconsulting.com

Attachment A

Issues and Concerns: Archaeological Monitoring Plan For a 3.81-Acre Parcel ("Parcel 10") in Kalaeloa, Honouliuli Ahupua'a, Ewa District, O'ahu Island, TMK: [1] 9-1-013:097 (Monahan and Watson, March 2024)

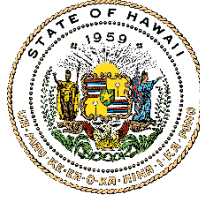
1. Page i and throughout. Confirm full-time monitoring for all ground disturbance over 12 inches deep. Delete on-call monitoring and replace with weekly spot monitoring for all ground disturbance less than 12 inches deep. [Weekly spot monitoring requires a monitoring inspection once a week. On-call monitoring means a monitor response only if someone calls and says there is a possible find.] Additionally, indicate archaeological monitoring is being done for identification purposes. [not mitigation]
2. General. Insert in Introduction reference to SHPD requesting monitoring, cite this SHPD letter (date, Project No., and Doc. No.) and include a copy of SHPD letter in an appendix.
3. Global. Revise throughout to provide a summary of the architectural documentation and assessment of Quonset huts designated Bldg. #152. This documentation and assessment must be finalized prior to SHPD making a HRS 6E project effect determination, assessing appropriate mitigation (if needed), and acceptance of the AMP. Acceptance of the architectural documentation will likely include assignment of an SIHP # to Bldg. #152. Architecture Branch needs to be consulted.
4. Page 30. Provide full SIHP # for each site first time referenced.
5. Page 31, last para. Clarify last sentence. An AMP was generated but not implemented?
6. Page 32, Table 1, Haun 1991. Change to 42 newly identified sites; same for Burgett & Rosendahl 1992. What were Tuggle & Murakami 1995 findings? Tuggle & Tomonari-Tuggle 1997 change to newly identified. Not new sites, just newly identified. Beardsley 2001 provide citation for IARII (acronym not defined; which mitigation plan is not identified).
7. Page 34, Table 1, NAVFAC 2015. Confirm the eligibility assessments are FINAL. Provide citation of SHPO concurrence. If necessary, follow up with SHPD. Thurman et al. 2017, clarify if historic properties, where they determined not significant? why no SIHP #s? Same issue for Monahan et al. 2021b. Site needs SIHP # assigned. Also ensure this site is added to Fig 20.
8. Page 37, 3) Fieldwork. Change on-site recommended to on-site will be conducted for...Change on-call to weekly spot monitoring will occur for ...less than 12 inches. Indicate use of both photo scale and North Area. Change County to City and County of Honolulu.
9. Page 37, 3) Fieldwork cont. Indicate the archaeological monitor will complete a SHPD Inadvertent Find Form, record GPS data using GPS unit with sub-meter accuracy and submit SIHP # request for the burial find and, if the burial is relocated, will submit GPS data and SIHP # for the burial relocation site. This documentation will be completed in coordination with SHPD staff.
10. Page 38, para 1. Revise to indicate within 10 ft. of a find. Indicate SHPD will be notified in writing via email and HICRIS and will include both the Archaeology Branch and the History and Culture Branch. All SHPD directives and decisions will be made in writing and uploaded to HICRIS.
11. Page 38, 4) Archaeologist's Role. Revise to indicate they have the authority, not that they will.
12. Page 38, 7) Report Preparation. Revise to indicate

Editorial Comments

13. Page 1, editorial. Change SHPD-Archaeology Branch to remove hyphen. Never spelled this way. Same comment for Page A-1.
14. Page 2, editorial. Change 6' chain-link fence to 6'-high. It is not a 6' segment of fence.
15. Page 16, Early 1800s, editorial. "These trails data..." awkward sentence.
16. Page 31, last para. Revise "...0.5 mile to northeast..." to "...0.5 mile to the northeast..."
17. Page 33, Table 1, Gosser et al. 2011, TMK should be consistent with other entries, revise to (1) 9-1-013:028 (por.); see Hammatt & Shideler 2012a; same for Gosser et al. 2013

JOSH GREEN, M.D.
GOVERNOR | KE KIA'AINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'AINA



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII'
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA

STATE HISTORIC PRESERVATION DIVISION
KAKUHIHEWA BUILDING
601 KAMOKILA BLVD, STE 555
KAPOLEI, HAWAII 96707

DAWN N.S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT
RYAN K.P. KANAKA'OLE
FIRST DEPUTY
DEAN D. UYENO
ACTING DEPUTY DIRECTOR - WATER
AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE
MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES
ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

April 22, 2024

Dawn Takeuchi-Apuna, Director
Department of Planning and Permitting (DPP)
City and County of Honolulu
Frank F. Fasi Municipal Building
650 S. King Street, 7th Floor
Honolulu, Hawai'i 96813
c/o Ryan A. Mori
ryan.mori@honolulu.gov

IN REPLY REFER TO:
Project No.: 2022PR00692
Doc. No.: 2404SCH09
Archaeology, Architecture

Dear Ms. Dawn Takeuchi-Apuna:

SUBJECT: Hawaii Revised Statutes (HRS) Chapter 6E-42 Historic Preservation Review – DPP Building Permit Applications – A2022-02-0158 and A2022-02-0159 Building 152 & 153 (Quonset Hut), Parcel 10, 91-1057 Enterprise Avenue, Kapolei Owner's Name: HUNT Communities Hawaii LLC (HUNT) Honouliuli Ahupua'a, 'Ewa District, Island of O'ahu TMK: (1) 9-1-013:097

This letter provides the State Historic Preservation Division's (SHPD's) review of the revised draft archaeological monitoring plan (AMP) titled *Archaeological Monitoring Plan For a 3.81-Acre Parcel ("Parcel 10") in Kalaeloa, Honouliuli Ahupua'a, 'Ewa District, O'ahu Island TMK: [1] 9-1-013:097* (Monahan and Watson, April 2024) and associated building permit applications (A2022-02-0158 and A2022-02-0159). SHPD previously reviewed the project and concurred with a project effect determination of "Effect, with agreed upon mitigation commitments." SHPD agreed that HABS documentation will suffice as mitigation for the proposed work at Buildings 153 & 152. Additionally, SHPD requested archaeological monitoring for identification purposes and requested revisions in to the draft AMP in the same letter (March 27, 2024; Doc. No. 2403JLP03). Our office received the revised AMP on April 17, 2024.

The project area, which is privately-owned by HUNT, consists of 3.81 acres in Kalaeloa. The project scope of work includes installation of new fire alarms, fire sprinklers, new lighting, electrical, a/c, new plumbing fixtures throughout the interior, new roll up door, removal of portion of Fire Riser Room, and a new door within north elevation wall with overhang and landing additions.

The revised AMP (Monahan and Watson, April 2024) meets the minimum requirements of HAR §13-279-4. **It is accepted.** Please send one hard copy of the document, clearly marked FINAL, along with a copy of this letter and a text-searchable PDF version of the AMP to the Kapolei SHPD office, attention SHPD Library. Also, submit a text-searchable PDF copy of the Final AMP to HICRIS Project No. 2022PR00692 using the Project Supplement option and a pdf copy to lehua.k.soares@hawaii.gov.

SHPD received HUNT's Amended Mitigation Proposal dated April 5, 2024, and it is currently under review. The Amended Mitigation Proposal includes the mitigation for the Bldg. 152 & 153 (Quonset Hut) and states "mitigation will be undertaken in the form of Architectural Recordation as a short form Historic American Building Survey (HABS)." Information about HABS can be found at: <https://www.nps.gov/subjects/heritagedocumentation/guidelines.htm>. Please contact

Dawn Takeuchi-Apuna

April 22, 2024

Page 2

Mary McPartland (mary_mcpartland@nps.gov) at the National Park Service for any additional information concerning the HABS report. The HABS report must be completed by a qualified professional per HAR §13-281-5. The HABS report and notification that NPS has accepted the HABS report will be submitted to HICRIS Project No. 2022PR00692 using the Project Supplement Option. The HABS report will be submitted to SHPD within 6 months of project initiation. **Please note** that photographic documentation for the HABS must be completed prior to project initiation.

SHPD hereby notifies the DPP and HCDA that the AMP (Monahan and Watson, April 2024) has been accepted and the permitting issuance process may continue.

SHPD requests written notification via email and HICRIS Project No. 2022PR00692 at the start of archaeological monitoring. Within 30 days of completion of archaeological monitoring fieldwork, SHPD looks forward to receiving a brief archaeological monitoring letter report of findings as specified in HAR §13-282-3(f)(1). Within 60 days of the completion of archaeological monitoring field work, SHPD looks forward to receipt of an archaeological monitoring report meeting the requirements of HAR §13-279-5 for review and acceptance.

Please submit the AMR along with its associated review fee, and any other project documents and correspondence to HICRIS Project No. 2022PR00692 using the Project Supplement option.

Please contact Mary Kodama, Historic Architect, at Mary.Kodama@hawaii.gov, for any concerns regarding architectural resources, and please contact Samantha Hemenway, O'ahu Island Archaeologist, at Samantha.Hemenway@hawaii.gov, for any matters regarding archaeological resources or this letter.

Aloha,

Alan Downer

Alan S. Downer, PhD

Administrator, State Historic Preservation Division

Deputy State Historic Preservation Officer

cc: Michael A. Kat, michael.kat@honolulu.gov
Craig K. Nakamoto, HDCA, craig.k.nakamoto@hawaii.gov
Kathleen Iriarte, kathleen.iriarte@huntcompanies.com
Polly Tice, pt@masonarch.com
Trisha Watson, watson@honuaconsulting.com
Olivia Gurney, Olivia.gurney@huntcompanies.com