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**DRAFT FOR SHPD REVIEW**  
**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**

Prepared for  
Hunt Communities Hawaii, LLC  
Honolulu, Hawai‘i

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April 2024

**EXHIBIT 17**

## Management Summary

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This archaeological monitoring plan (AMP) was completed on behalf of Hunt Communities Hawaii, LLC (Hunt). The project area, which is privately-owned by Hunt, consists of 3.81 acres in Kalaeloa, Honouliuli Ahupua‘a, ‘Ewa District, Island of O‘ahu is generally bounded by Enterprise Ave. to the west, Randolph St. to the south, Monterey St. to the north and a light-industrial lot to the east. The parcel is within the boundaries of the former Naval Air Station, Barbers Point (NAS-BP) military (World War II [WW II]-era) facility. In the 1990s, the NAS-BP facility was subject to an Environmental Impact Assessment (EIS) for its decommissioning (i.e., cleanup, disposal and reuse).

The project area is generally located in coastal Kalaeloa, just south (makai [seaward]) of the Kumuhonua Transitional Living Center and the Hawaii Army National Guard facilities; the surrounding area is generally characterized by light-industrial and other commercial operations. The Kalaeloa Airport (also known as John Rodgers Field), operated by the State of Hawai‘i (and once also part of the former NAS-BP), is located directly to the south.

The proposed scope of work to be monitored is described in this AMP, as are the archaeological monitoring provisions (see Section 4). As described herein, on-site (full-time) archaeological monitoring is recommended for all project-related ground disturbance greater than 12 inches (30.5 centimeters) in depth, whereas weekly spot-check monitoring shall occur for project-related ground disturbance less than 12 inches (30.5 centimeters) in depth. Archaeological monitoring is being conducted for identification purposes.

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## Section 1 Introduction

### 1.1 Project Background

This archaeological monitoring plan (AMP) was completed on behalf of Hunt Communities Hawaii, LLC (Hunt). The project area, which is privately-owned by Hunt, consists of 3.81 acres in Kalaeloa, Honouliuli Ahupua‘a, ‘Ewa District, Island of O‘ahu (Figure 1, Figure 2 and Figure 3). The parcel (TMK [1] 9-1-013:097) is generally bounded by Enterprise Ave. to the west, Randolph St. to the south, Monterey St. to the north and a light-industrial lot to the east.

The parcel is within the boundaries of the former Naval Air Station, Barbers Point (NAS-BP) military (World War II [WW II]-era) facility. In the 1990s, the NAS-BP facility was subject to an Environmental Impact Assessment (EIS) for its decommissioning (i.e., cleanup, disposal and reuse).

The project area is generally located in coastal Kalaeloa, just south (makai<sup>1</sup> [seaward]) of the Kumuhonua Transitional Living Center and the Hawaii Army National Guard facilities; the surrounding area is generally characterized by light-industrial and other commercial operations. The Kalaeloa Airport (also known as John Rodgers Field), operated by the State of Hawai‘i (and once also part of the former NAS-BP), is located directly to the south.

The proposed scope of work to be monitored is described below.

#### 1.1.1 Regulatory Context

In a letter submitted to the State Historic Preservation Division (SHPD) via HICRIS (Project No. 2022PR00692) dated July 24, 2023, Hunt proposed the subject AMP be prepared in consultation with the SHPD Archaeology Branch. In its response, SHPD’s letter (Project No.: 2022PR00692, Doc. No.: 2403JLP03) dated March 27, 2023 [sic, 2024] requested archaeological monitoring (see Appendix A and B). The subject AMP covers ground disturbing activities associated with the following proposed work at Parcel 10 (TMK [1] 9-1-013:097):

- Interior Building Improvements (structural, mechanical and electrical):
  - Fire alarm and fire sprinklers improvements
  - Electrical improvements, including upgrades to lighting and A/C
  - New plumbing fixtures
  - Egress corridor alterations
- Exterior Building Improvements:
  - Removal of a portion of the Fire Riser Room and new roll-up door on the south façade along the non-contributing portion of the building
  - A new door with an overhang inserted into the north sidewall of the north Quonset hut added in order to meet egress requirements - this will entail removal of a portion of the existing Quonset wall and one window, which are both character defining features of the building.
- Other exterior improvements:

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<sup>1</sup> Hawaiian words are not italicized in this document because ‘Ōlelo Hawai‘i (the Hawaiian language) has been an official state language since the late 1970s.

- Addition of a new small concrete landing at the outside of the building, to connect to an existing concrete sidewalk
- Removal and replacement of the 6'-high chain-link fence located in the rear
- Installation of an underground electrical line system to provide Hawaiian Electric Service to the building - majority of ground disturbance depth will be approximately 3', with boxes installed at a depth of approximately 5' to 6'
- Installation of an underground electrical line from the transformer to the building - majority of the ground disturbance depth will be approximately 30"

## 1.2 General Purpose and Content of Archaeological Monitoring Plans

Archaeological monitoring “entails the archaeological observation of, and possible intervention with, on-going activities which may adversely affect historic properties” (HAR § 13-279-3). According to HAR § 13-279-4, archaeological monitoring plans shall address the following eight main issues, the specifics of which are outlined later in this document (see “Archaeological Monitoring Procedures”):

1. What kinds of archaeological remains or historic properties are anticipated or require protection;
2. Where in the project area these properties are known to be or anticipated to be located;
3. Needed fieldwork to protect or document known or anticipated historic properties, which may include, but not be limited to, profile documentation of stratigraphy, drawings, photographs, lithic sourcing, and excavation of exposed features;
4. A provision that the archaeologist conducting the monitoring has been given the authority to halt ground disturbing activities in the immediate area of a find, in order to carry-out the plan. Project activities can shift to other areas in such a case;
5. A coordination meeting with any construction team and the archaeologist, so the construction team is aware of the plan;
6. Any laboratory work expected to be done;
7. Report preparation; and
8. Archiving of any collections.

## 1.3 Environmental Setting

### 1.3.1 Natural Environment

This section describes the environmental and physiographic conditions in the project area. Some direct observations made during our field inspection on possible historic patterns of change are described where applicable. In addition, information in this section is also derived from well-known sources including Foote et al. (1972), Macdonald et al. (1983) and Juvik and Juvik (1998).

The landscape in and around the project area generally consists of limestone (i.e., lithified coral reef) overlying flows of the Wai‘anae volcanic series (Macdonald et al. 1983:423). Thin alluvial soils are frequently documented in Kalaeloa over limestone, but the current project area is makai of these alluvial deposits). Elevation in the project area is approximately 35 feet (10.7 meters). U.S. Department of Agriculture (USDA-NRCS n.d.) soil survey data shows that sediments in the project area consist exclusively of Coral outcrop (CR) (see also Foote et al. 1972) (Figure 4).

When exposed and not covered by historic or modern deposits, the surface of such coral outcrop, which are Pleistocene deposits, is typically characterized by numerous small dissolution “pit caves,” also known colloquially as “sinkholes.” Referring specifically to these natural features in the region where the project area is located, Ziegler (2002:97) writes:

On the ‘Ewa Plain, rainwater has gradually dissolved **sinkholes** in more soluble portions of the exposed fossil reef. Typically, these sinkholes are bell-shaped in profile; the surface opening often is about 1 m (3.3. feet) or so in diameter, with the interior usually increasing to perhaps two or three times that. . .

Originally, there were tens of thousands of these sinkholes exposed on O‘ahu; . . . At least 99 percent of these, however, have been filled or covered in the last century or so by agricultural and developmental projects, but attempts continue to permanently preserve at least a small area of the few remaining sinkholes. These cavities have been found to contain innumerable bones of endemic Hawaiian birds (many of the species prehistorically extinct) as well as many other scientifically and educationally important animal and plant remains.

The project area is in one of the driest regions of O‘ahu; mean annual rainfall is less than 20 inches (508 millimeters) (Juvik and Juvik 1998:56). Prior to the historic period, vegetation in and around the project area would have consisted of lowland coastal dry shrub and grassland. Today, however, due to historic and modern human alteration of the landscape, the project area—which is almost entirely hardscaped with buildings, infrastructure and asphalt—contains very little vegetation; in addition to landscaping varieties of bushes and shrubs, there are also a variety of invasive grasses and weeds, koa haole (*Leucaena leucocephala*) and kiawe (*Prosopis pallida*) (Figure 5 and Figure 6).

### **1.3.2 Built Environment**

A currently vacant parking lot is in the eastern third of the project area. The now closed Tamura’s Market building is in the center. Swinerton Builders occupies the western portion of the subject parcel. Where not occupied by buildings and associated infrastructure and appurtenances, the project area is nearly entirely covered with asphalt and other hardscaping materials (etc., concrete walkways, concrete pads for shipping containers). One WW II-era architectural historic property (multiple Quonset Huts designated Facility # 152) is located in the project area; its description and evaluation by a qualified architectural historian is summarized below (see Section 3).





Figure 1. Portion of 1998 U.S. Geological Survey (USGS) topographic map (Barbers Point Quadrangle) with project area (base map source: ESRI's ArcMap 10.2.2)



Figure 2. Aerial image showing location of project area (base image source: ESRI's ArcMap 10.2.2)

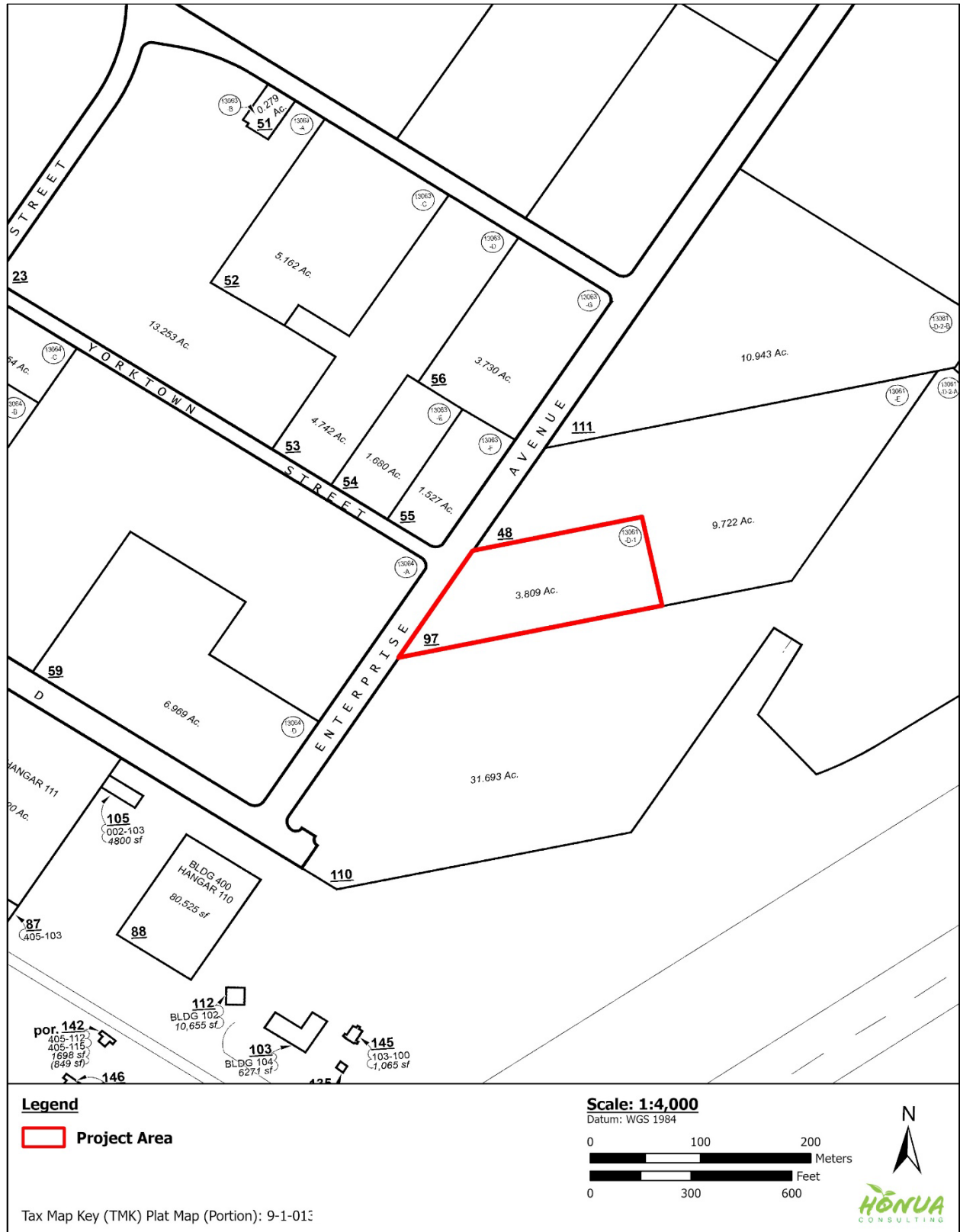


Figure 3. Tax Map Key (TMK) plat [1] 9-1-013 showing project area (parcel 097) location (source: Hawai'i TMK Service n.d.)

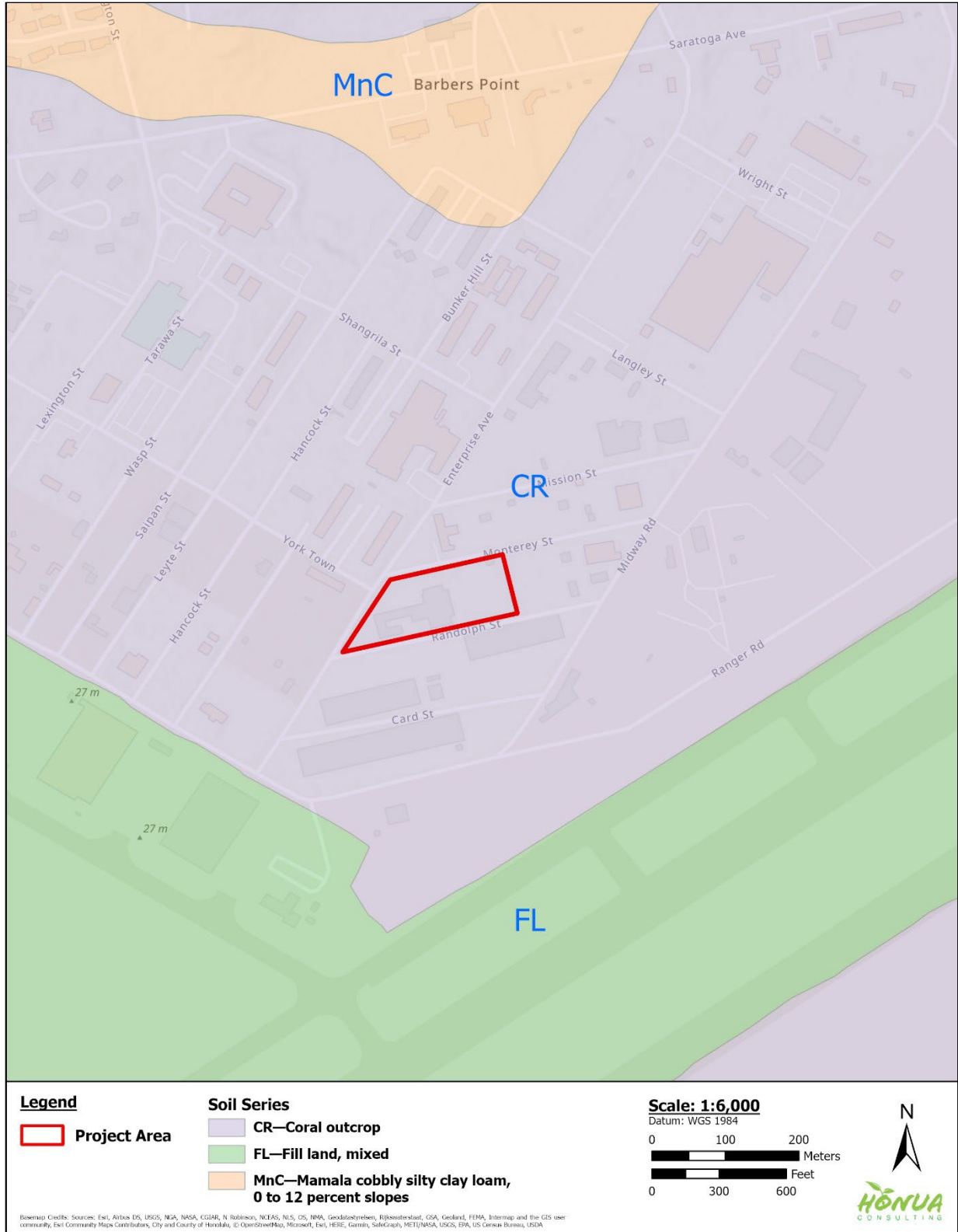


Figure 4. Soil series overlay showing anticipated soils in the project area (see text for discussion) (data source: Foote et al. 1972)



Figure 5. Project area overview from northwest corner; view east



Figure 6. Project area overview of northeastern corner of parcel; view south-southwest

## Section 2 Cultural and Historical Context

This section includes a brief synthesis of relevant cultural and historical information related to the types and character of land uses in and around the project area, specifically, as well as Honouliuli Ahupua‘a, more generally, from pre-Contact times into the historic period and modern times. Parts of this section are based on a recent study of the cultural, historical and archaeological resources of the ahupua‘a of ‘Ewa, a publicly-available document.<sup>2</sup> All such material used below from Uyeoka et al. (2018) was written by the lead author (Monahan). The main objective here, primarily through the analysis of historical documents, maps and aerial images, is to provide a project area-specific picture of land use and modification over time.

Research was completed for this project using resources obtained from the SHPD’s library in Kapolei, as well as the on-line database of the Environmental Review Program (ERP) within the Office of Planning and Sustainable Development which publishes EIS and EA documents; and referencing Honua’s proprietary databases. We also utilized the following on-line sources to obtain cultural, historical, and archaeological data:

- OHA’s Papakilo database (<http://papakilodatabase.com/main/main.php>)
- OHA’s Kipuka database (<http://kipukadatabase.com/kipuka/>)
- Bernice P. Bishop Museum archaeological site database (<http://has.bishopmuseum.org/index.asp>)
- Bishop’s Hawaii Ethnological Notes (<http://data.bishopmuseum.org/HEN/browse.php?stype=3>)
- University of Hawai‘i-Mānoa’s digital maps (<http://magis.manoa.hawaii.edu/maps/index.html>)
- DAGS’ State Land Survey (<http://ags.hawaii.gov/survey/map-search/>)
- Waihona ‘Aina website ([www.waihona.com](http://www.waihona.com))
- Digital newspaper archive “Chronicling America, Historic American Newspapers” (<http://chroniclingamerica.loc.gov/lccn/sn82014681/>)
- Hawai‘i State Archives digital collections (<http://archives1.dags.hawaii.gov/>)
- U.S. Library of Congress digital map collections (<https://www.loc.gov/maps/>)
- USGS Information Service, including digital map collections (<https://nationalmap.gov/historical/index.html>)
- AVA Konohiki’s website (<http://www.avakonohiki.org/>)

### 2.1 Hawaiian Cultural Landscape

As the largest ahupua‘a on the island of O‘ahu (at approximately 43,000 acres), Honouliuli (literally “dark bay,” Pukui et al. 1974) includes approximately 12 miles of marine coastline from Keahi Point in the east to Pili o Kahe in the west at the boundary with Nānākuli (and the district, or moku, of Wai‘anae) (Figure 7).

The general area within which the project parcel is located is known by its Hawaiian name as Kalaeloa, or “the long point” (ibid.). This descriptive, common place name in Hawaiian—both Maui and Moloka‘i also have a Kalaeloa—may in O‘ahu’s case refer to the relatively long distance one needed to walk over relatively hot, dry and barren country to get to the point (which is not actually long or particularly prominent).

<sup>2</sup> Available on-line at [https://www.ksbe.edu/assets/site/special\\_section/regions/ewa/Halau\\_o\\_Puuloa\\_Full-Ewa-Aina-Inventory\\_Binder.pdf](https://www.ksbe.edu/assets/site/special_section/regions/ewa/Halau_o_Puuloa_Full-Ewa-Aina-Inventory_Binder.pdf) (see Uyeoka et al. 2018 in References Cited)

In addition to its marine shoreline, Honouliuli also has several miles of shoreline along the western margins of Ke-awa-lau-o-Pu‘uloa (Pearl Harbor), the crown jewel of harbors in all of the Hawaiian Islands. Several loko (fishponds) and fish traps are located along this Pu‘uloa (Pearl Harbor) coastline in Honouliuli, and these waters are famous for their pipi, or pearl oysters, and a wide variety of fish including deep-ocean species (Handy and Handy 1972:469).

The expansive plain immediately inland of the marine coast—including the project area, consists of karstic (limestone) lithified reef with a thin soil covering and innumerable pit caves (or sinkholes) containing brackish water. As described by the Bishop Museum’s archaeologist McAllister (1933) in the 1930s (cited in Handy 1940:82), although appearing barren:

It is probable that the holes and pits in the coral were formerly used by Hawaiians. Frequently the soil on the floor of the larger pits was used for cultivation, and even today one comes upon bananas and Hawaiian sugar cane still growing in them.

Moving inland from these limestone flats, soil conditions improve and alluvium deposited from the uplands via a series of gulches—the most prominent being Honouliuli proper—created planting areas for Hawaiian subsistence farmers. The main traditional lo‘i kalo (irrigated taro) and settlement area was once around the mouth of Honouliuli Gulch, several miles northeast of the project area, where it empties into Pu‘uloa.

Prior to the historic period and drilling for artesian wells, many fresh-water springs were located where the uplands meet the lower flats: at numerous “toe of slope” locations that were once typical pūnāwai (fresh-water springs) on O‘ahu. Dryland (non-irrigated) gardening areas would have been scattered all over the lower uplands above the current H-1 highway (Uyekoa et al. 2018).

Because of its large size, Honouliuli had a vast upland forest that extended 10–12 miles back from the seashore. This mauka (inland) region was a reliable source of native, endemic, and Polynesian-introduced plants including kukui, koa, ‘ōhia, ‘iliahi (sandalwood), hau, kī (ti leaf), bananas, and many others. These resources provided not only food but also medicinal plants, wa‘a (canoe) trees, and other needed items (e.g., for religious practices, hula, and so on) (ibid.)

A network of trails criss-crossed these uplands and connected them with the lower makai areas. Many named pu‘u (hills and peaks), some with associated heiau (temples), are found throughout the mauka region of Honouliuli (see Figure 7). The well-known (and frequently reproduced) depiction of major trails in this region around 1800 by John Papa ‘Ī‘Ī (1959:96) shows a major east to west-oriented trail inland (mauka) of Pu‘u o Kapolei more than a mile north of the project area.

Figure 8, a portion of 1825 map by Malden shows a detail view in and around the project area and includes a section of mauka to makai-oriented trail about a mile to the east. This trail once connected the primary lo‘i taro lands at the mouth of Honouliuli Ahupua‘a with the shoreline southeast of the project area. An old freshwater pond—long since filled in by development makai (seaward) of the pu‘u, is shown northwest of the project area below (makai of) Pu‘u o Kapolei.





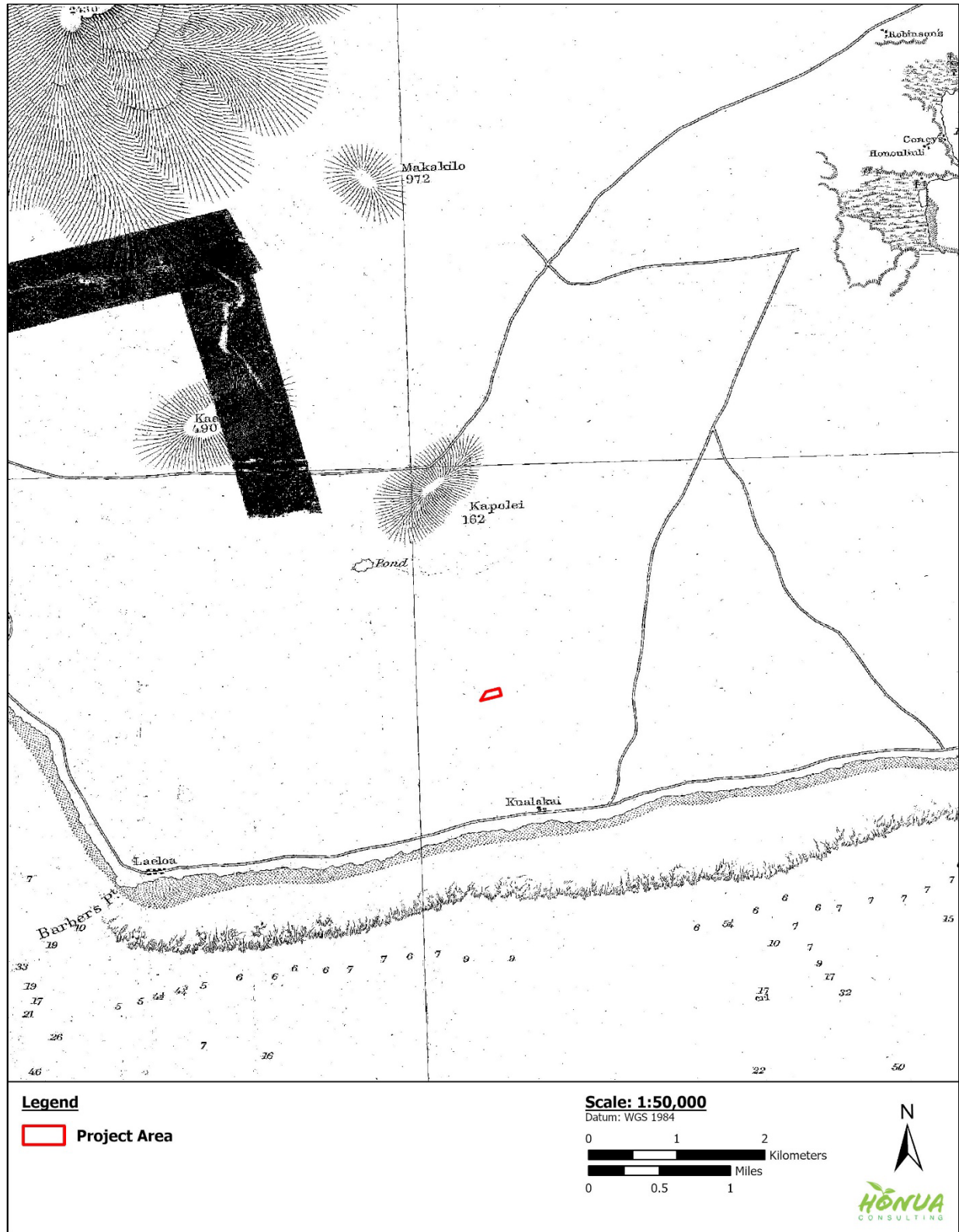


Figure 8. Portion of 1825 map by Malden (Registered Map 437) showing a section of mauka-makai trail less than a mile east of the project area (base map source: DAGS Land Survey Map Search, <http://ags.hawaii.gov/survey/map-search/>)

## 2.1.1 Mo‘olelo (Oral-historical Accounts)

Kepā Maly, master of the Hawaiian language and chronicler of Hawaiian cultural resources, provided a new translation of the epic saga of the travels of Hi‘iaka-i-ka-poli-o-Pele (Hi‘iaka), the youngest sister of Pele, to and from Kaua‘i (Maly n.d.).

Maly’s translation of “He Moolelo Kaa no Hiiaka-i-ka-poli-o-Pele” (“A Traditional Tale of Hi‘iaka who is Held in the Bosom of Pele”) was originally published in the Hawaiian language newspaper Ka Hoku o Hawaii from 1924 to 1928. The following excerpts of his work include descriptions of place names and wahi pana of Honouliuli as well as mele (songs) and ‘oli (chants) with direct relevance to this place. In the excerpt below, references to Honouliuli are in bold:

### He Mo‘olelo Ka‘ao no Hi‘iaka-i-ka-poli-o-Pele

The goddess Hi‘iaka journeyed from the island of Hawai‘i to Kaua‘i, stopping on Maui, Moloka‘i, and O‘ahu, as she went to fetch the chief Lohi‘au-ipo (Lohi‘au) from Hā‘ena and return with him to Pele’s domain at Kīlauea, Hawai‘i. The following narratives come from the portion of the legend that describes the return journey to Hawai‘i.

...Aloha ka hau o Ka‘ala ‘Oia hau halihali ‘a‘ala mau‘u nēnē	Beloved is the dew of Ka‘ala That dew which bears the fragrance of the nēnē grasses
Honi ai ke kupa o <b>Pu‘uloa</b>	[fragrant dew which] Kissed the natives of <b>Pu‘uloa</b>
He loa ka imina e ke aloha e...	One searches far for love... [January 18, 1927]

Preparing to depart from the village of the chiefess, Makua, Hi‘iaka elected to travel overland through Wai‘anae, to the heights of **Pōhākea**, and across the plain of **Honouliuli**. Hi‘iaka made preparations for Lohi‘au and Wahine‘ōma‘o to travel by canoe from Pōka‘i to the landing at Kou (Honolulu). Before letting them depart, Hi‘iaka instructed her two companions...

...As you travel, you will arrive at a place where a point juts out into the sea. That will be **Laeloa** [Barbers Point]; do not land there. Continue your journey forward. As you continue your journey, you will see a place where the ocean lies calmly within the land. That will be **‘Ewa**; do not land there. As you continue your journey, you will reach a place where the mouth [of the land] opens to the sea (hāmama ana ka waha i ke kai). That is **Pu‘uloa**, do not land there either. That is the entry way to **‘Ewa**...  
[January 25, 1927].

From the heights of **Pōhākea**, Hi‘iaka looked to the shores of **‘Ewa**, where she saw a group of women making their way to the sea. The women were going down to gather pāpa‘i [crabs] and limu [seaweed], and to gather the mahamoe, ‘ōkupe [both edible bivalves], and such things as could be obtained along the shore.

...

Now, the famous fish of **‘Ewa** in those days when the wind blew because of conversations was the pipi [pearl oyster – It was believed that talking would cause a breeze to blow that

would, in turn, frighten the pipi. (cf. Pukui and Elbert 1986)]. Only when it was very calm could one go to catch the pipi. If anyone spoke while going to get the pipi, the breeze would cause rippling on the water's surface and the pipi would be hidden from sight. In this way, Hi'iaka had instructed Wahine'ōma'o and Lohi'au to be quiet like the women of 'Ewa who were going fishing. If one spoke, the angry winds would blow and bring misfortune... [February 8, 1927]

...Turning her gaze towards the island of Hawai'i, she could see the flames of Pele in the lehua forest of Hōpoe, and she chanted out:

Nani <b>Pālailai</b> , he anaina kapu na ka wahine Ke kūkulu nei wau i ka pahu kapu ka leo O ka leo o ke kai ka'u e ho'olono e Ua lono aku la ke kupa Ua inu iho la nā manu i ke koena the wai noni Kūnewanewa a'e la nā 'ōpua i ka mālie Pua o mai ke ahi o Hawai'i ia'u...	Beautiful is <b>Pālailai</b> , sacred assembly of the woman I set up the drum of the sacred voice The voice of the ocean is what I hear The natives hear it <sup>3</sup> The birds drink the water caught in noni leaves <sup>4</sup> The billowy clouds pass in the calm The fires of Hawai'i rise above me...
--	--

...

Hi'iaka then offered a chant to the women who had strung their garlands upon the plain which is burned by the sun.

E lei ana ke kula o <b>Keahumoa</b> ma'o i ka ma'o 'Ohu'ohu wale nā wahine kui lei o ke kanahele Ua like no a like me ka lehua o Hōpoe Me he pua koili lehua ala i ka lā  Ka oni pua koai'a i ka pali  I nā kaupoku hale o 'Āpuku  Ke ku no i ke alo o ka pali o <b>Pu'uku'ua</b> He ali'i no na'e ka 'āina He kauwā no na'e ke kanaka I kauwā no na'e wau i ke aloha Na ke aloha no na'e i kono e haele no māua	The plain of <b>Keahumoa</b> wears the blossoms as its lei Adorning the women who string garlands in the wild It is like the lehua blossoms of Hōpoe Lehua blossoms upon which the sun beats down On the nodding koai'a flowers of the cliff On the rooftops of the houses at 'Āpuku Rising in the presence of the cliff of <b>Pu'uku'ua</b> The land is indeed a chief Man is indeed a slave I am indeed a slave to aloha—love It is love which invites us two, come
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<sup>3</sup> According to some traditions, the stormy ocean of Waialua could reportedly be heard in 'Ewa.

<sup>4</sup> In the past, after storms, forest birds could be seen in the lowlands drinking water in this manner.

E hele no wau a–

I come–

[‘Āpuku and Pu‘uku‘ua are both places situated on the upland plain of Honouliuli.]

...

Descending to the flat lands of **Honouliuli**, Hi‘iaka then turned and looked at **Pu‘uokapolei** and Nāwahineokama‘oma‘o who dwelt there in the shelter of the growth of the ‘ōhai [*Sesbania tomentosa*], upon the hill, and where they were comfortably refreshed by the blowing breezes. Hi‘iaka then said, “Pu‘uokapolei and Nāwahineokama‘oma‘o, do not forget me, lest you two go and talk behind my back and without my knowing, so here is my chant of greeting to you:”

Aloha ‘olua e **Pu‘uokapolei mā**Greetings to you two **Pu‘uokapolei** and companionE **Nāwahineokama‘oma‘o**O **Nāwahineokama‘oma‘o**

E nonoho mai la i noho wale la

Set there, and dwelling

I ka malu o ka ‘ōhai

In the shade of the ‘ōhai

I ke kui lei kukui i ka lā

Stringing garlands of kukui in the day,

Lei aku la i ka pua o ka

Adorning yourselves in the garlands

ma‘oma‘o

of the ma‘oma‘o

Lei kauno‘a i ke kaha o **Ka‘ōlino**Kauno‘a [*Cuscuta sandwichiana*] is thelei of the shores of **Ka‘ōlino**

He ‘olina hele e

There is joy in traveling

## 2.1.2 Other Mo‘olelo Related to the Project Area Environs

The level plains of Honouliuli—within which the project area is located—are thought to be the legendary “kula o Kaupe‘a” (plain of Kaupe‘a), the realm of the ao kuewa or ao ‘auwana (homeless or wandering souls). Kaupe‘a was the wandering place of those who died having no rightful place to go; the souls wandered “in the wiliwili grove” (Sterling and Summers 1978:36). According to the nineteenth century Hawaiian historian Samuel Kamakau (1961:47, 49), the spirits who wandered “on the plain of Kaupe‘a beside Pu‘uloa...could go to catch pulehaua (moths or butterflies) and nanana (spiders)” in the hope of finding helpful ‘aumakua (family deities) who could save them.

The prolific Hawaiian language master, Mary Kawena Pukui, shared her personal experience with the ghosts on the plain of Kaupe‘a around 1910:

A wide plain lies back of Keahi and Pu‘uloa where the homeless, friendless ghosts were said to wander about. These were the ghosts of people who were not found by their family ‘aumakua or gods and taken home with them, or had not found the leaping places where they could leap into the nether world. Here [on the plain of Honouliuli] they wandered, living on the moths and spiders they caught. They were often very hungry for it was not easy to find moths or to catch them when found.

Perhaps I would never have been told of the plain of homeless ghosts if my cousin’s dog had not fainted there one day. My cousin, my aunt and I were walking to Kalaeloa, Barber’s Point, from Pu‘uloa accompanied by Teto, the dog. She was a native dog, not the so-called poi dog of today, with upright ears and body and size of a fox

terrier. For no accountable reason, Teto fell into a faint and lay still. My aunt exclaimed and sent me to fetch sea water at once which she sprinkled over the dog saying, “Mai hana ino wale ‘oukou i ka holoholona a ke kaikamahine. Uoki ko ‘oukou makemake ‘ilio.” “Do not harm the girl’s dog. Stop your desire to have it.” Then with a prayer to her ‘aumakua for help she rubbed the dog. It revived quickly and, after being carried a short way, was as frisky and lively as ever.

Then it was that my aunt told me of the homeless ghosts and declared that some of them must have wanted Teto that day because she was a real native dog, the kind that were roasted and eaten long before foreigners ever came to our shores (Pukui 1943:60-61).

Along the coast, just in front of the current Kalaeloa Airport, there is a place called Kualaka‘i (see Figure 7), and there used to be a pūnāwai there called Hoakalei. According to Maly (n.d.:15), additional information about this spring and environs is found in the legendary series titled “Nā Wahi Pana o ‘Ewa” (The Famous Places of ‘Ewa), which ran in the Hawaiian language newspaper *Ka Loea Kālai ‘Āina* (c. 1900). It described two “strange” women who lived on the plain called Puukaua, beyond Pu‘ukapolei, toward Wai‘anae. Once, after going down to Kualaka‘i on the coast to gather ‘a‘ama crabs, pipipi (a type of univalve marine shell), and limu (seaweed), they failed to return home before morning light, and were turned into a single pillar of stone (Sterling and Summers 1978:39).

## 2.2 Historic Period

### 2.2.1 Overview

In general, starting around the turn of the eighteenth to nineteenth century, and continuing throughout the nineteenth century, life on O‘ahu was drastically changed with the arrival and increasing influence of foreign political, economic, and ideological systems. As a result, traditional Hawaiian settlement patterns, subsistence, and religious institutions were largely abandoned. By the late 1800s, nearly the entire ahupua‘a of Honouliuli had been purchased by a few large landowners and developed into cattle ranches, sugar cane fields, sisal farms, and other agricultural concerns (Tuggle and Tomonari-Tuggle 1997; Gosser et al. 2011). Military development of the region began in the late 1800s with the construction of the Barbers Point Lighthouse and accelerated significantly in the early 1900s with the creation of several large bases including Naval Air Station Barbers Point (NAS-BP), Hickam Field, and Pearl Harbor. Since the closing of NAS-BP in the 1990s, small industry and other commercial, government, and residential development have replaced military infrastructure (Gosser et al. 2011).

### 2.2.2 Early 1800s

As stated above, ‘Ī‘ī’s well-known description and mapping of the old, traditional Hawaiian trails of leeward O‘ahu (‘Ī‘ī 1959:96) shows a major trail passing by the project area about a mile to the east. Malden’s 1825 map shows this and other nearby Hawaiian trails, but none of them are closer than about a mile from the project area (see Figure 8). The location of these trails, and other information such as the location and distribution of prime lo‘i kalo (irrigated taro) lands (several miles to the northeast of the current project area), and the location of early Christian missions (closer to Pu‘uloa, or Pearl Harbor), suggest the project area vicinity—which lacked

potable water and was extremely arid—was not a prime location for Hawaiian settlement or activity (Hammatt and Shideler 2012a). This is not to say the area was abandoned or lacked human occupation, because there is evidence in the vicinity of the project area—as well as along the coastline to the south—that Hawaiians were using this area in traditional times (ibid.).

With the arrival of foreigners in the area, the landscape of Honouliuli, the ‘Ewa plains, and other adjacent areas (e.g., the Wai‘anae Mountain slopes) was largely denuded by the removal of sandalwood trees (for the Chinese market) and other trees (for construction in Honolulu), and by the introduction of large domesticated ungulates (e.g., goats, sheep and cattle) that destroyed native vegetation, replacing it with exotic, pest species such as koa haole (*Leucaena leucocephala*), guava (*Psidium guajava*), lantana (*Lantana camara*), and many invasive and aggressive grasses (ibid.).

### 2.2.3 Middle 1800s

Beginning in the 1840s, private property was introduced via formation of the Board of Commissioners to Quiet Land Titles, and the adoption of the Māhele (i.e., the division of Hawaiian lands). In 1845, King Kamehameha III waived his right to full authority over all lands; he portioned out some for his personal use (crown lands), and divided the rest into government land, land for the ali‘i (chiefs) and konohiki (land overseers), and land for commoners (kuleana land) (Alexander 1891; Board of Commissioners 1929; Moffat and Fitzpatrick 1995). After this time, Land Commission Awards (LCAs) were granted to commoners as kuleana parcels for fee ownership. LCAs record who resided on the land and how the land was used. There are no kuleana (commoner) parcels, nor claims, in or near the project area. About 100 claims were made in the ahupua‘a of Honouliuli, but these were all located several miles northeast of the project area (near the mouth of Honouliuli Stream and other locations along the shore of Pu‘uloa [Pearl Harbor]). The project area was part of Ali‘i Nui (highly-ranked elite) Land Commission Award 11216:8 (Royal Patent 6071) to Kekau‘ōnohi (great granddaughter of Kekaulike, King of Maui, and a close relative of Kamehameha I), which means there are no records or surveys of middle nineteenth century land use in or near the project area (because such documentation was not required of Ali‘i Nui awards). Kekau‘ōnohi’s deed to all unclaimed land within the ahupua‘a was for a total of 43,250 acres (Board of Commissioners 1929).

When Kekau‘ōnohi died in 1851, her holdings passed on to her husband (Ha‘alelea) and his family. Upon her death on June 2, 1851, all her property was passed on to her husband and his heirs. When Ha‘alelea died, the property went to his surviving wife, who then leased it to James Dowsett and John Meek in 1871 for ranching operations (Hammatt and Shideler 2012a).

In 1877, James Campbell purchased most of the Honouliuli Ahupua‘a. He soon began drilling for potable water in Honouliuli, and, within about a decade, was supplying water to Honolulu. By 1881, Campbell also ran a successful cattle ranching operation in Honouliuli (ibid.).

In 1889, Campbell leased his property to Benjamin Dillingham, who founded the O‘ahu Railway & Land Co. (O.R. & L.) in 1890. Dillingham then subleased all land below 200 feet elevation to William Castle, who started the ‘Ewa Plantation Co. for sugar cane cultivation. Other Dillingham lands at higher elevation were used by another sugar cane operation, O‘ahu Sugar Co. (ibid.). ‘Ewa Plantation Co. was incorporated in 1890 and continued in operation into modern times. The ‘Ewa Plantation Co.’s farming practices caused soil erosion from the uplands onto the coral plain (ibid.).

## 2.2.4 Early 1900s to Modern Times

Figure 9, a portion of 1902 map, shows the project area located on the “Coral Plain” and near a sisal plantation (to the northeast), which refers to Dillingham’s Hawaiian Fiber Company. This map also depicts the nearby O.R. & L. to the north, and a north to south-oriented road (probably for horse-drawn wagons) to the west. No structures are depicted within or near the project parcel at this time.

Figure 10, a portion of 1913 map, shows rock walls related to the sisal plantation east of the project area. The main line of the O.R. & L. railroad is depicted as located just to the north of the project area. A 1919 map (“War Department Fire Control map, Barbers Point quadrangle,” not reproduced here) shows the same basic picture as the 1913 map. No structures are depicted within the project parcel at this time, but a cross-slope trail or road is shown just to the south.

Figure 11 and Figure 12, portions of a 1927 map and aerial image, respectively, show little to no change in and immediately around the subject parcel, which is still undeveloped at this time.

Figure 13 is a portion of 1939 map of the Ewa (sugar cane) Plantation Company’s fields. This map shows that sugar cane fields were located north of the project area, but not within it. The earliest U.S. military structures (e.g., the Mooring Mast to the northeast) and infrastructure (e.g., U.S. Army Road to the south) in the area are depicted. The project area is within an expansive area of coastal and near-coastal Honouliuli labelled “Coral Reef.”

By the early 1940s, some sugar cane fields that extended south (makai) of the O.R. & L. railway line (still north of the project area) had been developed over by the U.S. military. Hammatt and Shideler (2012a:25, 28) describe the changes that took place around this time in and near the project area:

Major land use changes came to western Honouliuli when the U.S. Military began development in the area. Military installations were constructed both near the coast and in the foothills and upland areas. Barbers Point Military Reservation (a.k.a. Battery Barbers Point from 1937–1944) was located at Barbers Point Beach, and used beginning in 1921 as a training area for firing 155 mm guns . . . Also within the vicinity was the Camp Malakole Military Reservation (a.k.a. Honouliuli Military Reservation), used from 1939, and the Gilbert Military Reservation, used from 1922–1944. The largest and most significant base built in the area was the Barbers Point NAS, which operated from 1942 into the 1990s. It housed numerous naval and defense organizations, including maritime surveillance and anti-submarine warfare aircraft squadrons, a U.S. Coast Guard Air Station, and the U.S. Pacific Fleet.

In 1930, the U.S. Navy leased 206 acres of land on the ‘Ewa Plain from the Campbell Estate for the purpose of building a mooring mast for the dirigible *Akron*. At the expiration of the lease in late 1939 or early 1940, the Navy acquired over 3,500 acres of land from the Estate. In 1941, the Marine Corps Ewa strip was completed on a portion of the land to serve as an auxiliary airfield for the Navy’s Ford Island Facility. The Ewa Marine Corps Air Station was extensively damaged during the Japanese attack on Pearl Harbor on December 4, [sic] 1941. During World War II, the design capacity of the station was changed. The major construction of Barbers Point was completed from 1941 to 1945.

A portion of 1943 map (Figure 14) shows the project area environs in a state of active development by the military, but no structures yet in the subject parcel. NAVFAC (2015) states that one or more of the Quonset Huts designated Facility # 152 were built in or just before 1943, although these are not shown on this map.

A 1951 U.S. Naval Air Station map (Figure 15) and aerial image (Figure 16) show significant post-WW II development in and near the project area, including some buildings and resources that still remain in some form or another on the property, including an earlier configuration of the Quonset Huts designated Facility # 152, which have been altered and reconfigured over the years (NAVFAC 2015). This WW II-era historic property is being described and evaluated by a qualified architectural historian (see Section 3 below).

A 1953 topographic map (Figure 17) does not add much to the information from the 1951 map and aerial image.

Later depictions of the project area—in a 1968 aerial image (Figure 18) show additional build-out of portions of the current project area.



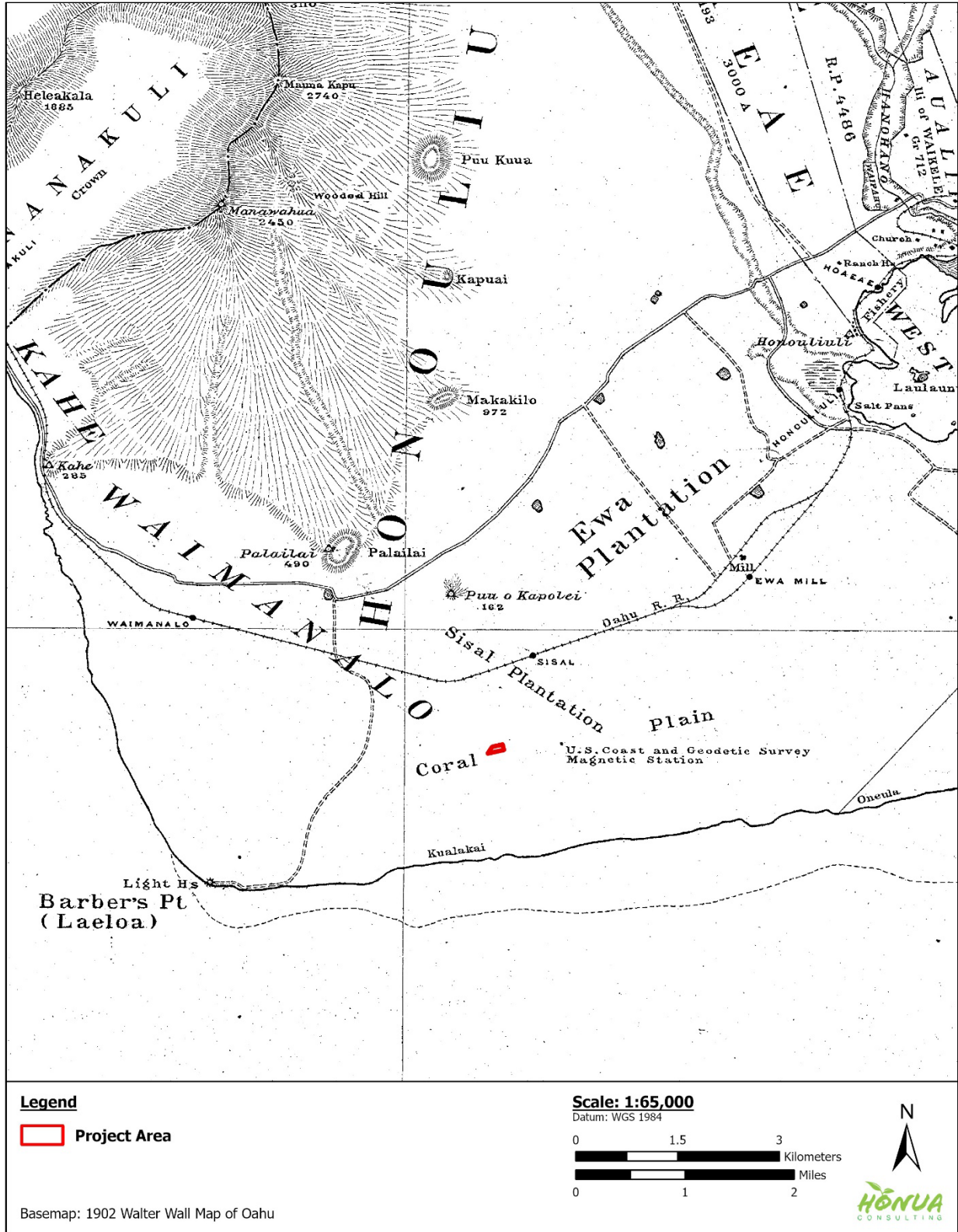


Figure 9. Portion of 1902 map by Wall/Donn (Registered Map 2374) showing turn-of-the-century” developments near the project area (base map source: DAGS Land Survey Map Search, <http://ags.hawaii.gov/survey/map-search/>)

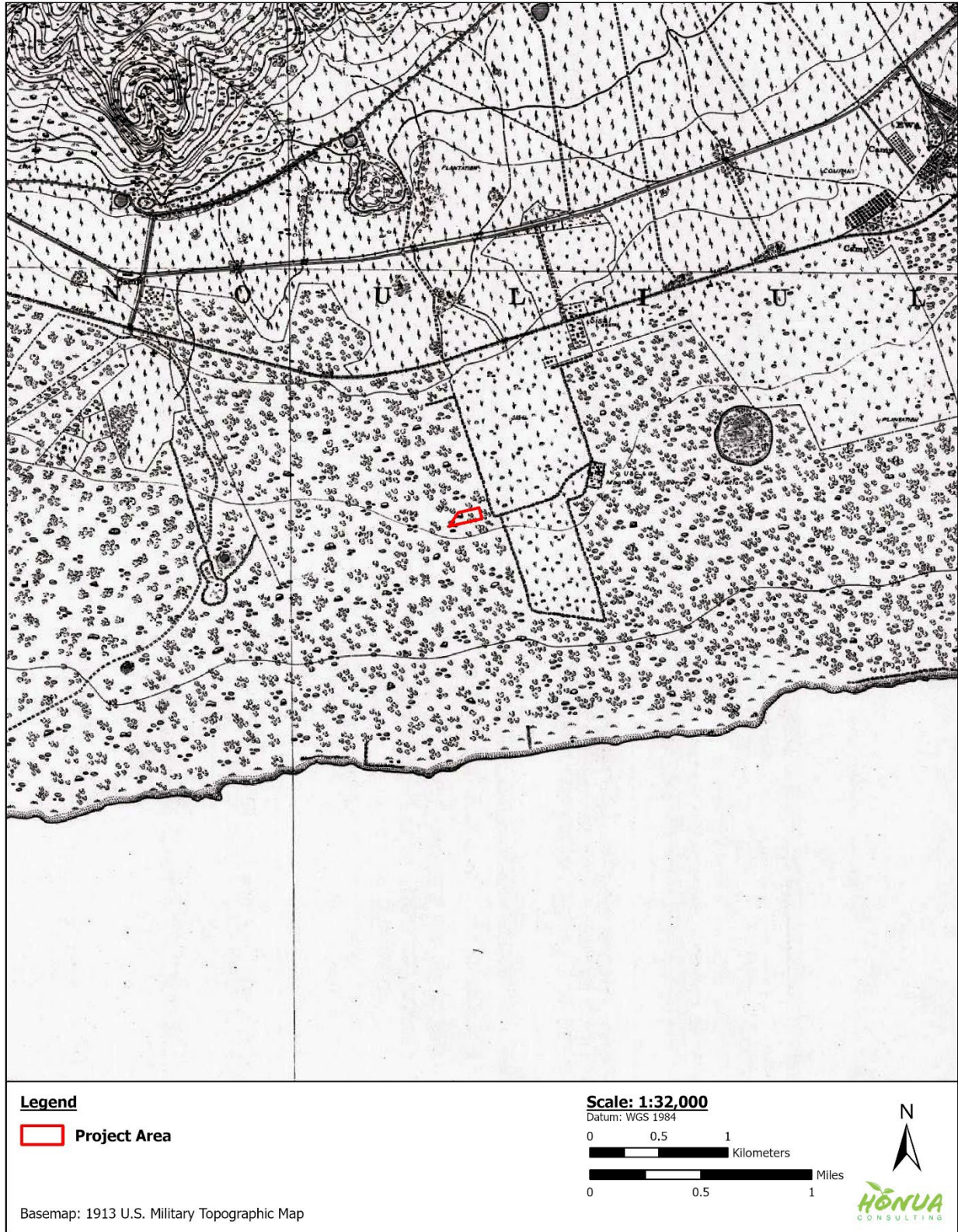


Figure 10. Portion of 1913 topographic map shows project area adjacent to commercial sisal growing operation (to the east) (base map source: University of Hawai‘i-Mānoa’s digital maps, <http://magis.manoa.hawaii.edu/maps/index.html>)

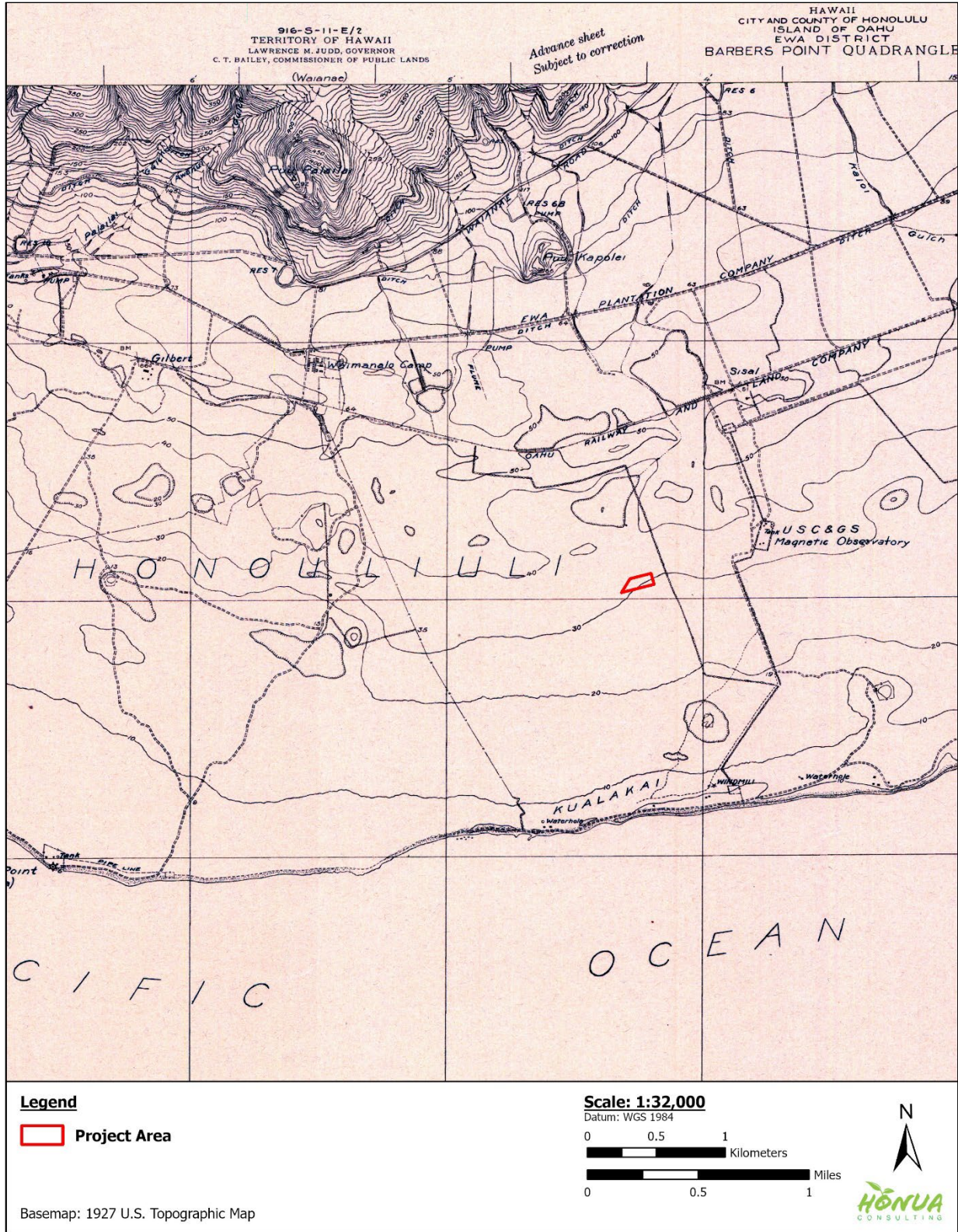


Figure 11. Portion of 1927 topographic map with project area location (base map source: University of Hawai‘i-Mānoa’s digital maps, <http://magis.manoa.hawaii.edu/maps/index.html>)

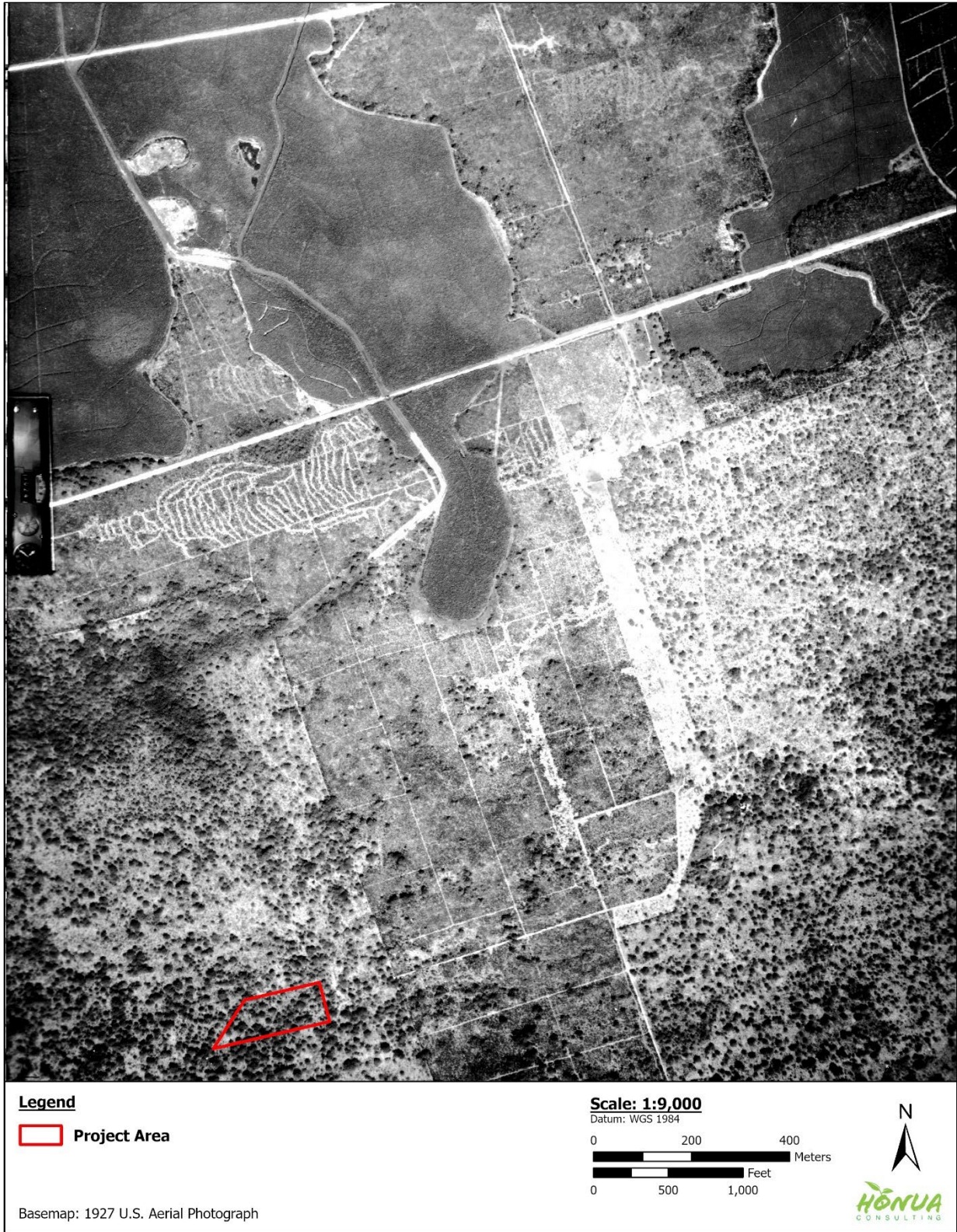


Figure 12. Portion of 1927 aerial photograph with project area location (base image source: University of Hawai‘i-Mānoa’s digital maps, <http://magis.manoa.hawaii.edu/maps/index.html>)

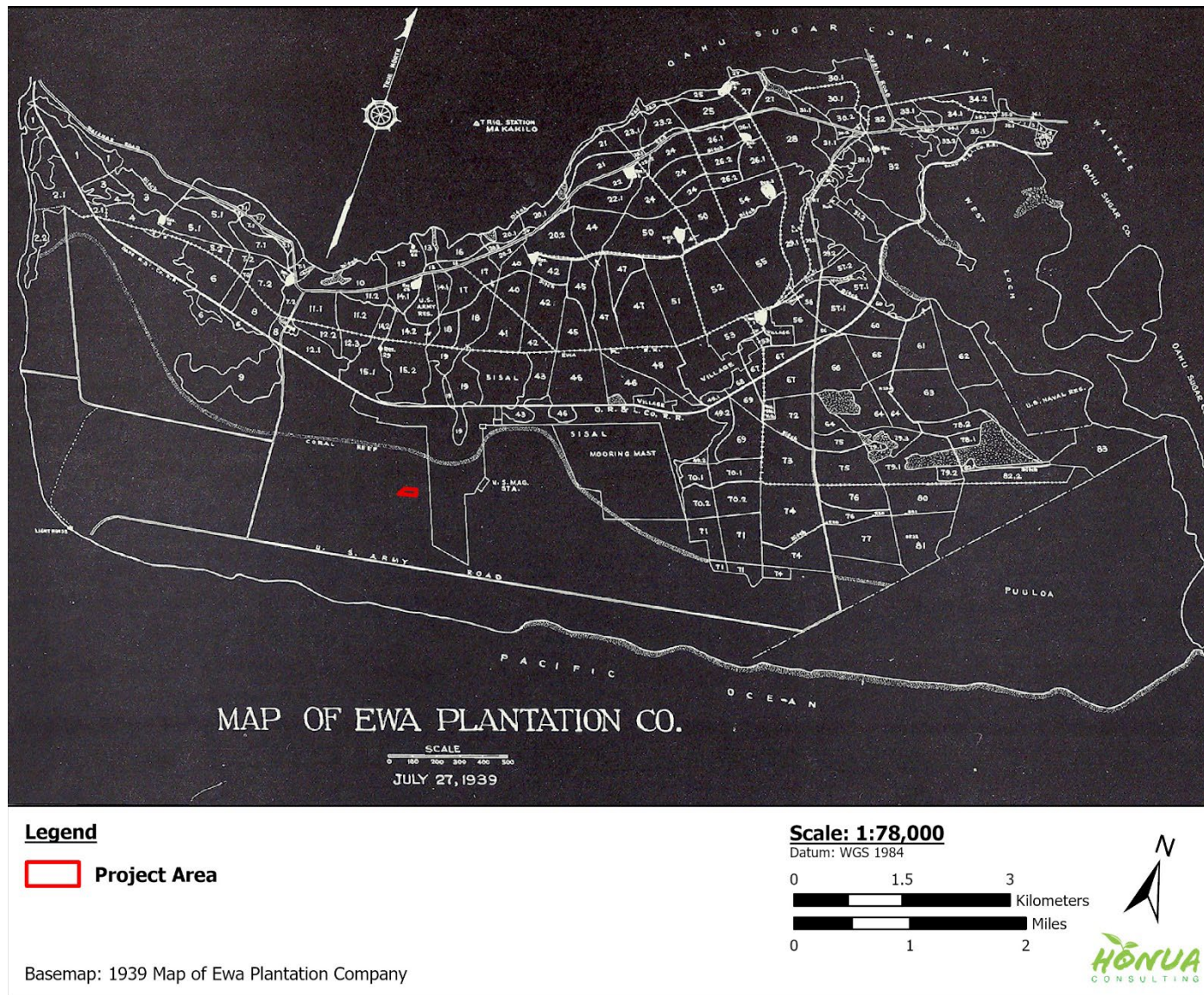


Figure 13. Detail of 1939 Ewa Plantation Co. map showing the project area in an area of commercial sisal production, and adjacent to sugar cane field #s 19 & 43 (base map source: Condé and Best 1973:285)



Figure 14. Portion of 1943 topographic map with project area location (base map source: University of Hawai‘i-Mānoa’s digital maps, <http://magis.manoa.hawaii.edu/maps/index.html>)

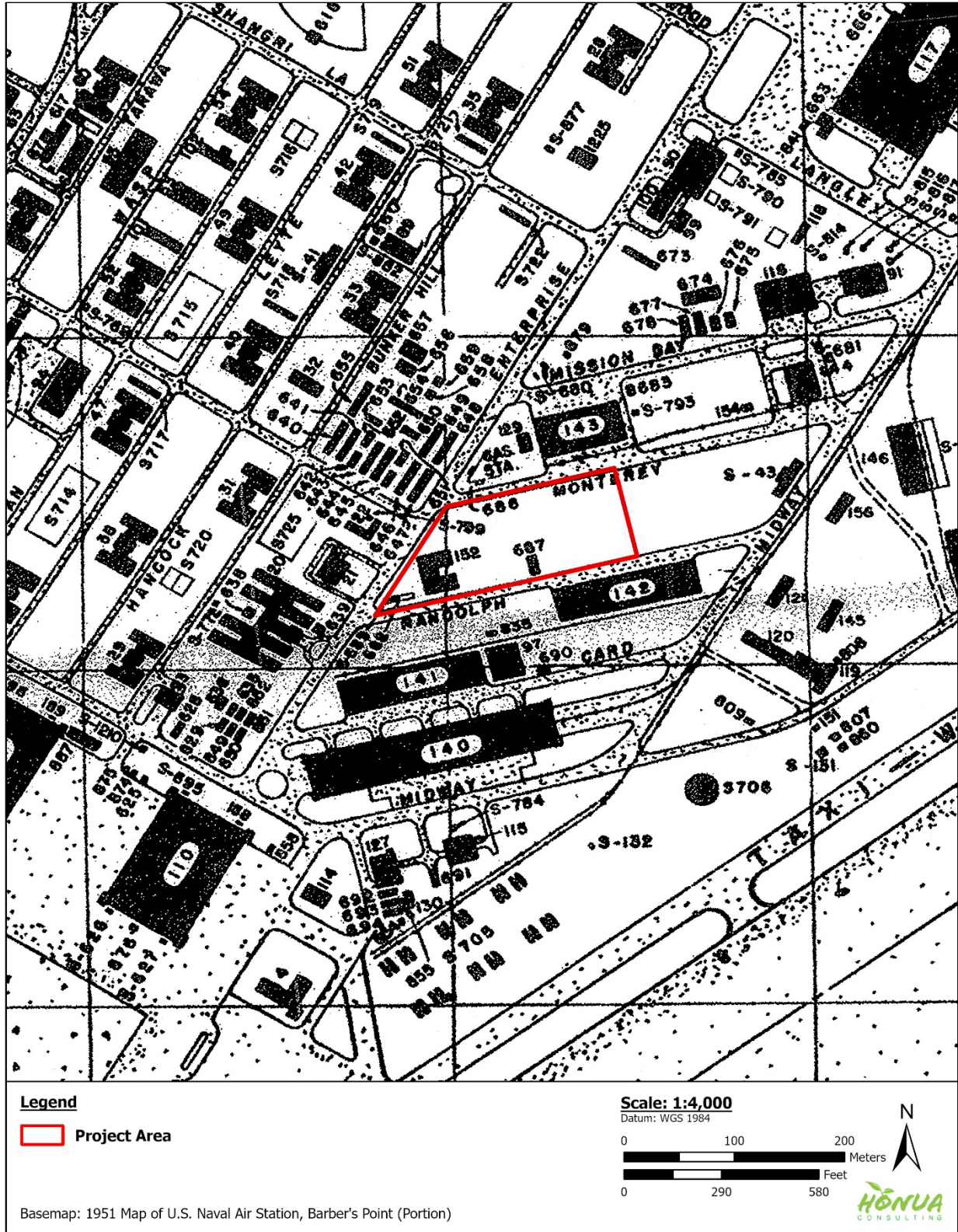


Figure 15. Portion of 1951 “Map of U.S. Naval Air Station, Barber’s Point, Honouliuli, Oahu, T.H.,” showing project area location (courtesy of NAVFAC)



Figure 16. Portion of 1951 aerial photograph with project area location (base image source: University of Hawai‘i-Mānoa’s digital maps, <http://magis.manoa.hawaii.edu/maps/index.html>)



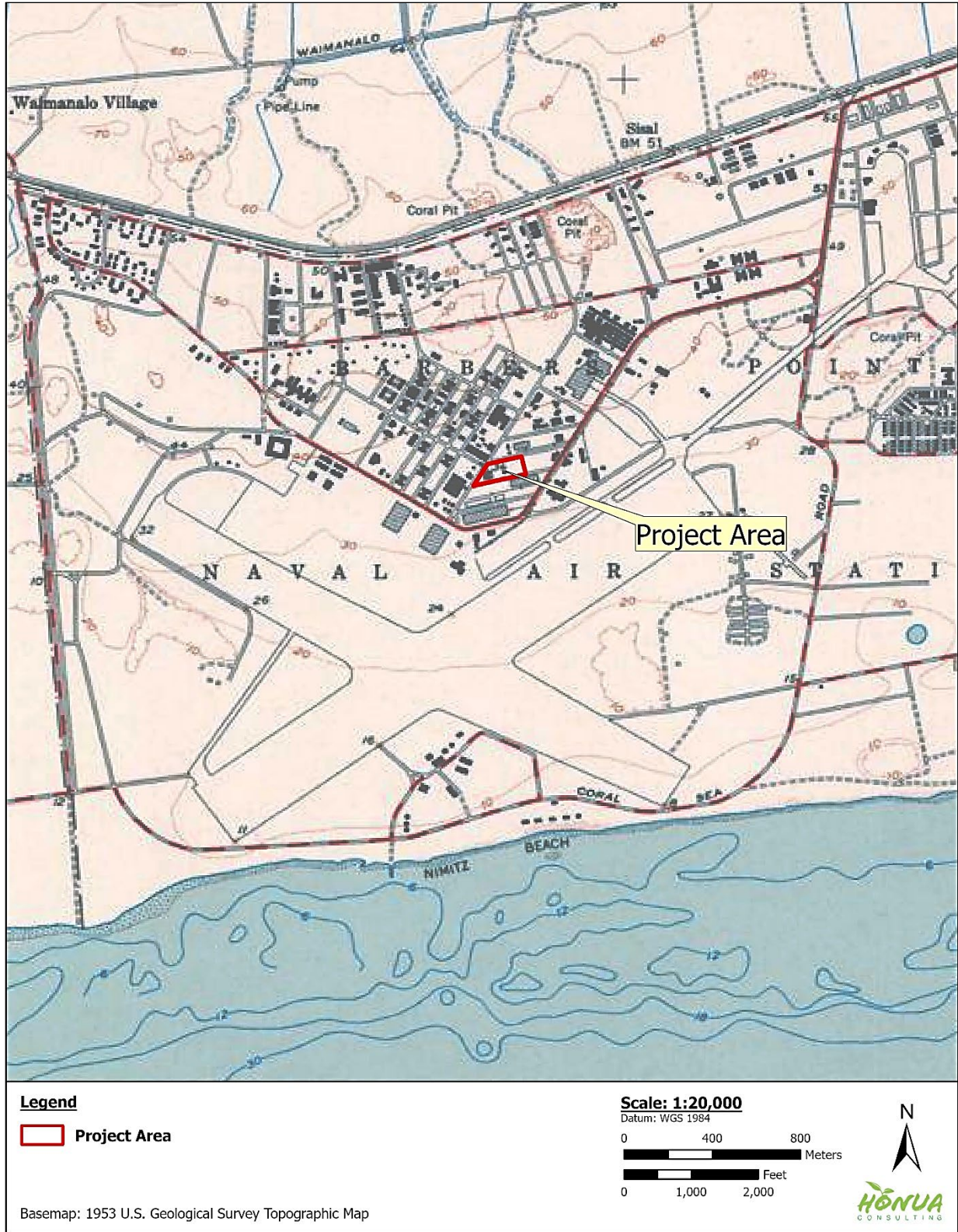


Figure 17. Portion of 1953 topographic map with project area location (base map source: University of Hawai‘i-Mānoa’s digital maps, <http://magis.manoa.hawaii.edu/maps/index.html>)



Figure 18. Portion of 1968 aerial photograph showing project area location (base image source: University of Hawai‘i-Mānoa’s digital maps, <http://magis.manoa.hawaii.edu/maps/index.html>)

## Section 3 Previous Archaeological Studies

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In this section, we summarize previous archaeological studies in order to reconstruct human use and modification of the land in and near the project area from pre-Contact times into the historic period. The main purpose of presenting this information is to develop predictive data about the types and distribution of archaeological historic properties and their component features we expected to encounter; and to assist interpretation of any new findings.

This section also includes discussion of one architectural historic property (Quonset Huts, Facility # 152) located in the current project area.

Table 1 is a summary of previous archaeological studies and results in and near the project area. Figure 19 and Figure 20 summarize and depict the results of previous archaeological studies in and near the project area.

### 3.1 Overview Statement

Previous archaeological studies show there are no above-ground archaeological sites in the subject project area, which was completely cleared of surface sites (i.e., grubbed, graded and bulldozed) starting in the early to middle twentieth century. The entire ground surface of the project area was modified by military development starting after 1927 (see Figure 11 and Figure 12) and before 1943 (see Figure 14).

This documented disturbance of the project area's ground surface, and to some unknown depth portions of its subsurface, does not preclude the possibility of there being archaeological sites or component features (e.g., pit caves, also known as sinkholes, that may contain traditional Hawaiian sites) in subsurface context; such sites have been documented in subsurface context by numerous studies throughout the limestone (or coral) plain of Kalaeloa.

### 3.2 Historic Properties in the Project Area

With the exception of Facility # 152, there are no previously-identified historic properties in the project area. The project area was included in the original survey of the greater military base property (Tuggle and Tomonari-Tuggle 1997), but no archaeological resources were identified in the subject parcel. Monahan and Watson's (2023) archaeological literature review and field inspection (ALRFI) did not identify any above-ground archaeological historic properties in current the project area.

MASON has conducted an assessment of Facility # 152 (Quonset Huts), designated State Inventory of Historic Places (SIHP) 50-80-12-09414, and has provided the following description:

One structure on the project site, Facility 152, is a historic property as it exceeds 50 years in age. It is identified as a historic building in the Quitclaim Deed Exhibit O (Historic Buildings), and was evaluated by MASON as meeting National Register of Historic Places (NRHP) Criterion C and HAR §13-284-6 Criterion "c" as a distinctive architectural form incorporating World War II-era Quonset huts and retaining sufficient integrity for this criterion. The structure is comprised of two Quonset huts that were constructed in 1943 and joined together by 1947, and a concrete masonry unit (CMU) commissary structure added at the

rear in 1968. MASON evaluates the rear CMU structure as a non-contributing component of the historic Quonset building.

SHPD concurred with the evaluation of Facility 152 in their review letter dated March 27, 2024 (Doc. No.: 2403JLP03). Further, SHPD determined the After the Fact work, and the proposed work, will have an adverse effect under Section 106, and an ‘effect, with proposed mitigation commitments’ under HAR §13-275-7. SHPD has requested HABS recordation to mitigate these effects. The short format HABS will include 5 photographs, including images that show the Quonset’s condition prior to modifications made to the vehicular doors on the front façade and the proposed modifications to the north wall.

### 3.3 Archaeological Historic Properties within ½-Mile of Project Area

As depicted in Figure 20, the closest archaeological historic properties to the project area are nearly 0.5 mile to the north, between Saratoga and Roosevelt avenues. A cluster of several archaeological sites (SIHP #s 50-80-12-01728, 50-80-12-04649, 50-80-12-04650, 50-80-12-04651, 50-80-12-04652 and 50-80-12-04653) was identified in the early 1990s. SIHP #s 01728, 04649 and 04652 are about 0.5 mile away (the others are more distant to the north). SIHP # 01728, a coral-rock (sisal plantation) wall was first recorded by Haun (1991). The other sites, identified by Landrum and Schilz (1993), include another section of sisal wall (SIHP # 04649) and a traditional Hawaiian habitation and gardening complex consisting of multiple features (SIHP # 04652). Excavations at SIHP # 04652 (and at SIHP #s 04650 and 04651) yielded midden consisting of marine shells (gastropods and bivalves), crustacean, and fish bone. Land snails, medium-size mammals including *Sus scrofa* (pig), *Rattus* sp. (rat), and *Mus musculus* (mouse), unidentified bird bones, kukui (*Aleurites mollucana*), unidentified seeds, wood bark, and wood charcoal were also collected. Artifacts collected consisted of worked bone pieces (pick tip, and fishhook shank), a basalt hammerstone, a basalt core, a basalt flake, a limestone core, a coral scraper and file/abrader, and fire-affected basalt.

### 3.4 Other Archaeological Studies within ½-Mile of Project Area

Nearby archaeological studies by Cleghorn and Kahahane (2009), Vernon and Desilets (2013) and Rivera and Monahan (2016), all of which included either subsurface excavation or observation of subsurface excavations, did not identify any significant archaeological historic properties or component features. Pits caves (“sinkholes”) were observed in these studies, but none contained cultural materials.

Hammatt and Shideler’s (2012a) archaeological inventory survey approximately 0.5 mile to the northeast also did not identify any significant archaeological historic properties or component features. Inglis et al.’s (2014) archaeological monitoring plan did not include fieldwork; monitoring of this project area by Rivera and Monahan (2016) did not identify any significant archaeological historic properties.

Table 1. Summary of Previous Archaeological Studies in and near Project Area

Previous Study	Formal Type	Results & Comments <sup>1</sup>
Haun 1991*	Archaeological inventory survey of 1,310-acre Naval Air Station, Barbers Point	42 newly identified sites: SIHP #s 01717–01757; majority were traditional (Hawaiian) habitation & agricultural complexes; 6 had evidence of historic-period ranching use; also included utilized and potentially utilized pit cave (“sinkhole”) features
Burgett & Rosendahl 1992	Archaeological inventory survey – Naval Air Station, Barbers Point (Contaminated soil stockpile/remediation facility)	20 newly identified sites: SIHP #s 04548–04567; included traditional (native Hawaiian) agricultural and temporary habitation complexes containing mounds, modified sinkholes, a wall, terrace, modified outcrop, cairn, enclosure, pavement, platforms, an alignment, and cave
Erkelens 1992	Archaeological mapping of a single site – Naval Air Station, Barbers Point	Mapped SIHP # 01719, previously described by Haun (1991); new features included large high walled enclosure, small enclosures, C-shapes and mounds
Jones 1993	Cultural resource survey - Naval Air Station, Barbers Point, consisting of 3 discontinuous project areas, total 55 acres)	5 previously-recorded sites (Haun 1991) were studied including SIHP #s 01718 (habitation complex), 01719 (habitation complex), 01720 (habitation/agricultural complex), 01723 (habitation complex), & 01726 (platform, wall, mound cluster)
Landrum & Schilz 1993	Archaeological reconnaissance survey of TMK (1) 9-1-013:063 – west of the current project area	9 military buildings (#s 446-454) and 6 archaeological sites: SIHP #s 01728, 04649 & 04653 (sisal plantation walls), SIHP # 04650 (habitation complex), SIHP # 04651 (terrace & mound) & SIHP # 04652 (3 mounds); excavations recovered midden, traditional artifacts & radiocarbon dates from SIHP # 04650 (range AD 1665 to modern times)
Kaneshiro & Schilz 1994	Cultural resource management plan for the Navy base	Review of (then known) previously-identified historic properties in the area
Tuggle & Murakami 1995	Archaeological inventory survey of construction projects at Naval Air Station, Barbers Point	Several previously-identified sites were studied, including SIHP #s 01723, 01724 & 1726; and 2 newly identified sites were identified: SIHP #s 04701 & 04702
Tuggle & Tomonari-Tuggle 1997	Cultural resource inventory for entire Naval Air Station, Barbers Point	Re-evaluated sites previously recorded by Haun (1991); also described 35 newly identified sites: SIHP #s 05093–05130 & 05307; included pre-Contact habitation, historic-period habitation, ranching and trail remnants; WW II buildings and sites; “cold war” era structures; paleo-environmental samples collected from pit caves and wetland features
Beardsley 2001	Subsurface excavation of 63 sites as recommended in mitigation plan by	254 test units were excavated and “confirmed prehistoric Hawaiian occupation and use

Previous Study	Formal Type	Results & Comments <sup>1</sup>
	Tuggle and Tomonari-Tuggle 1995	within the area of Naval Air Station Barbers Point.”
O’Hare & Hammatt 2003	Archaeological assessment (AIS no findings) of Bathhouse at Kalaeloa Campsite, Nimitz Beach	No significant findings
Cleghorn & Kahahane 2009	Archaeological assessment (AIS no findings) of parcel bounded by Hancock, Shangrila and Bunker Hill streets	No significant findings
Thurman et al. 2011	Archaeological inventory survey of Proposed U.S. Coast Guard Hanger location	2 sites recorded: SIHP # 05121 (small concentration of rubble-filled sinkholes) and SIHP # 05125 (complex of WWII pillboxes); also noted a subsurface cultural layer (likely part of SIHP # 02220) eroding from Nimitz Beach
Gosser et al. 2011	Archaeological inventory survey – Kalaeloa, TMK (1) 9-1-013:028 (por.)	5 previously recorded sites (SIHP #s 01717–01719, 01721 & 01722 investigated; 12 new sites documented: SIHP #s 07176 (military wall, enclosure & terrace), 07177 (military foundations & vault), 07178 (military feature), 07179 (military platform), 07180 (portable concrete machine gun pillbox), 07181 (military refuse dump), 07182 (sinkhole complex), 07184 (sinkhole), 07185 (sinkhole complex), 07186 (sinkhole), 07187 (road and mounds) & 07188 (military/industrial site); 325 traditional and historic artifacts and abundant faunal materials were collected; SIHP #s 01717–01719, 01721, 01722, 01785 & 01786 radiocarbon dated to AD 1650 to 1870
Hammatt & Shideler 2012a	Archaeological inventory survey of parcels TMK (1) 9-1-013:032 (por.), 045 & 046	No significant findings
Hammatt & Shideler 2012b	Archaeological field inspection and literature review	No significant findings
Gosser et al. 2013	Archaeological monitoring – Kalaeloa, TMK (1) 9-1-013:028 (por.)	Monitored 6 previously-recorded sites (Haun & 1991, Jones 1993, Gosser et al. 2011): SIHP #s 01721 (habitation complex), 01727 (cave & sinkhole), 07176 (military complex), 07177 (military complex), 07180 (concrete pillbox) & 07181 (historic artifact scatter)
Vernon & Desilets 2013	Archaeological assessment (AIS no findings) of parcel TMK (1) 9-1-013:063	No significant findings
Inglis et al. 2014	Archaeological monitoring plan for the Kalaeloa Airport Hangar 110 Underground Facility Project	Review of (then known) previously-identified historic properties in the area
Medrano et al. 2014	Archaeological inventory survey of parcel TMK (1) 9-1-013:070	23 previously recorded sites investigated: SIHP #s 05119 & 05120 (agriculture / habitation complexes) and SIHP #s 07483 to 07504 (agricultural sites, habitation complexes, rock mounds, enclosures, karst

Previous Study	Formal Type	Results & Comments <sup>1</sup>
		pits, platforms and trails); 146 features documented
NAVFAC 2015	Identification of Historic Properties and Eligibility Determinations for Previously Identified Resources on Parcels 1-16 at Kalaeloa (Formerly Naval Air Station Barbers Point)	Final report on NRHP-eligibility assessments – including Facility # 152 (Quonset Huts) in the current project area
Rivera & Monahan 2016	Hangar 110 at Kalaeloa Airport – archaeological monitoring report	No significant findings
Thurman et al. 2017	Archaeological inventory survey for Proposed New Naval Facility – U.S. Coast Guard	2 historic properties identified: a stacked coral mound (designated temporary site Honua 1) and multiple filled pit caves (“sinkholes”) (designated site Honua 2)**
Monahan et al. 2021a	Archaeological field inspection and literature review of parcel TMK (1) 9-1-013:128	Several above-ground structures, including buildings, all of which were constructed during or after WW II times, were identified; no traditional Hawaiian sites observed
Monahan et al. 2021b	Archaeological inventory survey of parcel TMK (1) 9-1-013:081	In addition to 2 previously known, WW-II era buildings, 1 pit cave (“sinkhole”) was identified that contained human skeletal remains (designated SIHP # 09419)
Monahan & Watson 2023	Archaeological field inspection and literature review of the current project area	No significant findings – but archaeological monitoring recommended for ground disturbance in the subject project area

<sup>1</sup> SIHP = State Inventory of Historic Places; formal (complete) SIHP numbers in this table are preceded by “50-80-12-.”

\* Haun (1991) included contribution by Marion Kelly

\*\* These sites were determined to be “not eligible for inclusion in the State or National Register” (Thurman et al. 2017:48–49) and no SIHP #s were obtained.

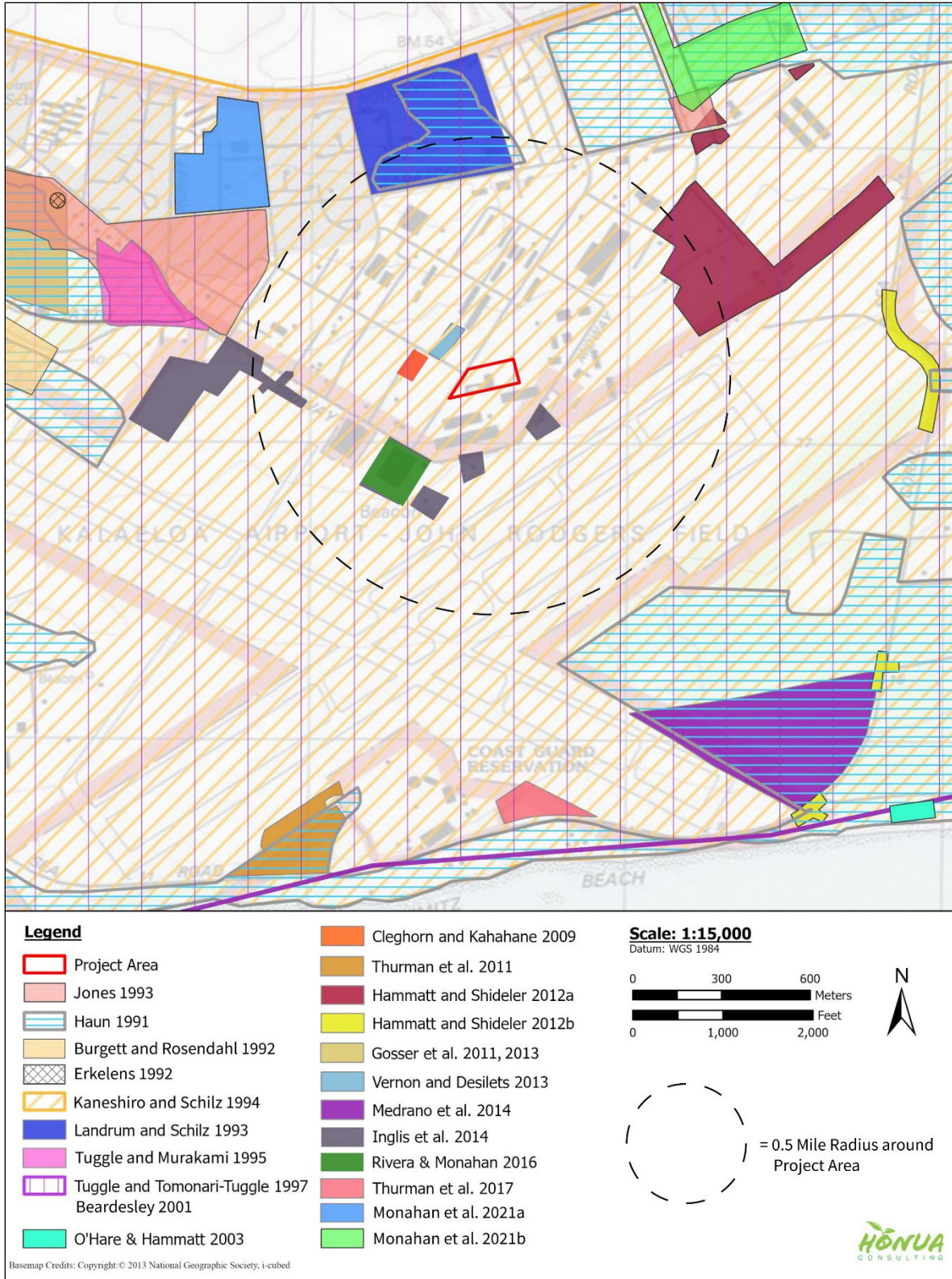


Figure 19. Previous archaeological studies in and within approximately one mile of the project area; dashed-line circle denotes smaller (0.5-mile) radius around project area (see table and text above for details)



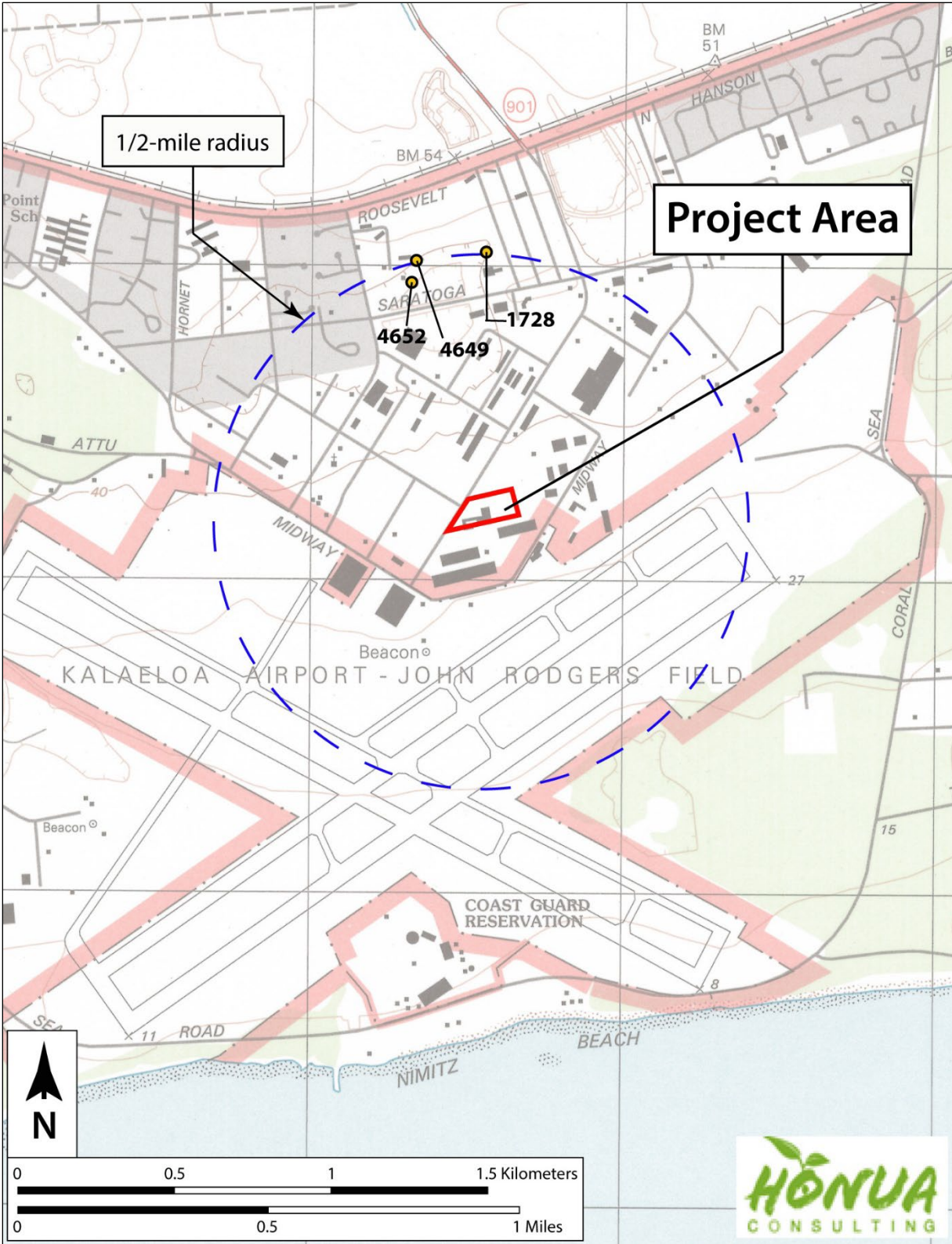


Figure 20. Previously-identified archaeological sites within approximately one-half mile of the project area (see table and text above for details)

## Section 4 Archaeological Monitoring Provisions

Under HAR §13-279-3, “Archaeological monitoring may be an identification, mitigation, or post-mitigation contingency measure. Monitoring shall entail the archaeological observation of, and possible intervention with, on-going activities, which may adversely affect historic properties”. The monitoring program is being conducted for identification purposes, not as a mitigation measure, and will serve to ensure proper documentation and treatment of any historic properties encountered during project construction.

HAR §13-279-4, requires that each monitoring plan discuss eight specific questions. The monitoring provisions below address these requirements for archaeological monitoring within the current project area.

### **1) Anticipated Properties:**

Based on available evidence described in this plan, there is a moderate potential to encounter historic properties, component features thereof, isolated artifacts and/or other cultural deposits dating from the pre-Contact period, in particular, in subsurface contexts. Specifically, “pit caves” (or sinkholes) in subterranean context may contain traditional sites, features, isolated artifacts and/or midden, including human skeletal remains and burials.

### **2) Locations of Historic Properties:**

Historic properties, their component features and/or isolated artifacts, midden or other cultural deposits may be encountered anywhere in the proposed project area. There is no way to predict their precise location given the documented distribution of sinkholes on the ‘Ewa Plain.

### **3) Fieldwork:**

On-site (full-time) archaeological monitoring is recommended for all project-related ground disturbance greater than 12 inches (30.5 centimeters) in depth, whereas weekly spot-check monitoring shall occur for project-related ground disturbance less than 12 inches (30.5 centimeters) in depth. Project proponents must contact Honua Consulting prior to any excavation or construction activities that will require ground disturbance so that a determination regarding depth of disturbance can be made; and, a qualified archaeologist can be present when required. Any departure from this will only be allowed through consultation with and written concurrence from the SHPD.

Archaeological fieldwork will use current standard archaeological recording techniques including drawing of trench wall profiles and documentation of stratigraphy where cultural features or artifacts are exposed as well as in representative areas throughout the project area. Profiles will be photographed and noted on a construction map. Photographs will include a photo scale for ease in showing the size and depth of excavations and north arrow. Sampling will include the collection of representative artifacts and bulk sediments samples, as determined appropriate.

SHPD will be notified in the event of significant findings including human skeletal remains. If human skeletal remains are identified, SHPD, the City and County of Honolulu Coroner’s Office and the City and County of Honolulu Police Department (in

accordance with HAR § 13-300-40) will be immediately notified. All construction work within 10 feet of the finding of a human burial will be stopped and no exploratory work will be conducted unless requested by SHPD. All human skeletal remains encountered during archaeological monitoring will be handled in compliance with HAR § 13-300-40, which states all treatment of inadvertent burials be determined by the SHPD in consultation with recognized descendants.

The archaeological monitor will complete an SHPD Inadvertent Find Form, record GPS data using a GPS unit with sub-meter accuracy and submit an SIHP # request for the burial find; if the burial is relocated, Honua Consulting will submit GPS data and an SIHP # for the burial relocation site. This documentation will be completed in coordination with SHPD staff.

The 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.

#### **4) Archaeologist's Role:**

Field archaeologists have the authority to stop work immediately in the area of any findings so that documentation can proceed and appropriate treatment can be determined. In addition, the archaeologist has the authority to slow and/or suspend construction activities in order to ensure necessary archaeological documentation be conducted.

#### **5) Coordination Meeting:**

A coordination meeting will be held prior to any construction or ground disturbance activities to orient the construction crew to the requirements of the archaeological monitoring program. At this meeting the monitor will emphasize his or her authority to temporarily halt construction and state that all finds (including artifacts such as bottles) are the property of the landowner and may not be removed from the construction site. At this time, it will be made clear that the archaeologist must be on-site (full-time) during all subsurface excavation below 12 inches (30.5 centimeters) in depth.

#### **6) Laboratory Work:**

Laboratory work will be conducted in accordance with HAR § 13-279-5 (6). Laboratory analysis of non-burial related finds will be recorded and standard artifact recording will be used. Artifacts will be recorded with provenience information, measurements, weight, type of material, and functional interpretation. Photographs of representative artifacts will be taken for inclusion in the final report.

Collected marine shell and animal bone will be tabulated, weighed, and analyzed for species identification. Collected charcoalized material suitable for chronometric dating will be sent for taxonomic identification at the International Archaeological Research Institute, Inc. (IARII), and one or more samples may be sent to Beta Analytic, Inc., for radiocarbon dating. Traditional basalt artifacts may be sent to the University of Hawai'i-Hilo Geoarchaeology Lab for Energy-Dispersive X-ray Fluorescence (EDXF) analysis to identify where the material may have been procured. All analyzed samples, methods for sample selection, results, and provenience information will be presented and summarized within the final report.

**7) Report Preparation:**

The archaeological monitoring report (AMR) will follow the requirements of HAR § 13-279-5, and will include sections on monitoring methods, archaeological results, stratigraphy, laboratory analyses of artifacts and collected materials, and identified historic properties. Photographs and profiles of excavations will be included in the monitoring report even if no historically significant sites are documented. If human skeletal remains are encountered during monitoring, the context in which they were found as well as detailed descriptions will be presented within the AMR. The AMR will be submitted to the SHPD for review and approval.

**8) Archiving Materials:**

All collected materials from this investigation belong to the landowner. All collected materials will be stored in Honua Consulting's climate-controlled storage unit. The location of the curated artifacts can be changed to a separate agreed-upon location through consultation between the landowner and SHPD.

**4.1 Research Objectives**

Research objectives that may be explored during the monitoring program include:

- 1.) Are there any extant "pit caves" (sinkholes) in the project area that have not been completely in-filled with modern sediments? If so, can discrete layers or features in subsurface context be recognized, mapped in three dimensions and assessed for cultural content and temporal character?
- 2.) If "pit caves" (sinkholes) containing historically-significant materials are identified, can specific functions be identified based on material content?

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# Appendix A – SHPD’s Letter Requesting Monitoring

This appendix contains SHPD’s letter (Project No.: 2022PR00692, Doc. No.: 2403JLP03) dated March 27, 2023 [sic, 2024] requesting archaeological monitoring.

**JOSH GREEN, M.D.**  
GOVERNOR | KE KIA'ĀINA  
**SYLVA LUKE**  
LEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



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

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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](mailto: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, Kalaeloa.; 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, Kalaeloa, 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

Dawn Takeuchi-Apuna  
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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

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Page 3 of 5

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](mailto: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](mailto: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](mailto:craig.k.nakamoto@hawaii.gov)  
Michael Kat, DPP, [michael.kat@honolulu.gov](mailto:michael.kat@honolulu.gov)  
Kathleen Iriarte, [kathleen.iriarte@huntcompanies.com](mailto:kathleen.iriarte@huntcompanies.com)  
Polly Tice, [pt@masonarch.com](mailto:pt@masonarch.com)  
Trisha Watson, [watson@honusconsulting.com](mailto:watson@honusconsulting.com)

Dawn Takeuchi-Apuna  
 March 27, 2024  
 Page 4 of 5

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 1 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

## **Appendix B – Hunt’s Consultation Letter to SHPD**

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This appendix contains Hunt’s letter submitted to the State Historic Preservation Division (SHPD) via HICRIS (Project No. 2022PR00692) dated July 24, 2023; this letter proposed the subject AMP be prepared in consultation with the SHPD Archaeology Branch and described the proposed scope of work to be covered under this AMP.



Hunt Communities Hawaii, LLC  
737 Bishop Street, Suite 2750  
Honolulu, Hawai'i 96813  
Office: 808-585-7900

Alan S. Downer, PhD, Administrator  
State Historic Preservation Division  
Kakuhihewa Building  
601 Kamokila Blvd., Suite 555  
Kapolei, HI 96707

July 24, 2023

Submitted via HICRIS

**Re: Kalaeloa Parcel 10: After-the-Fact and Proposed Work  
HCDA Development Permit Application  
HRS Chapter 6E-42 and Historic Preservation Covenant Review  
HICRIS Project Number 2022PR00692, TMK (1) 9-1-013:097**

Dear Dr. Downer,

Hunt Communities Hawaii, LLC (HCH) submitted a Development Permit Application to HCDA for After-the-Fact and Proposed Work located at Parcel 10, TMK (1) 9-1-013:097. Parcel 10 is outlined in red in **Figure 1**. The HCDA requires that the State Historic Preservation Division (SHPD) review the After-the-Fact and Proposed Work on Parcel 10 before the permitting process can proceed. HCH has engaged Mason Architects, Inc. (MASON) to prepare an Evaluation of Effects and Honua Consulting (Honua) to prepare an Archaeological Literature Review and Field Investigation (ARLFI) for this project.



**Figure 1** Aerial image showing Parcel 10 outlined in red. (Draft ARLFI, Honua Consulting, June 2023, Page 5)





**Scope of Work on Parcel 10, TMK (1) 9-1-013:097 (por.):**

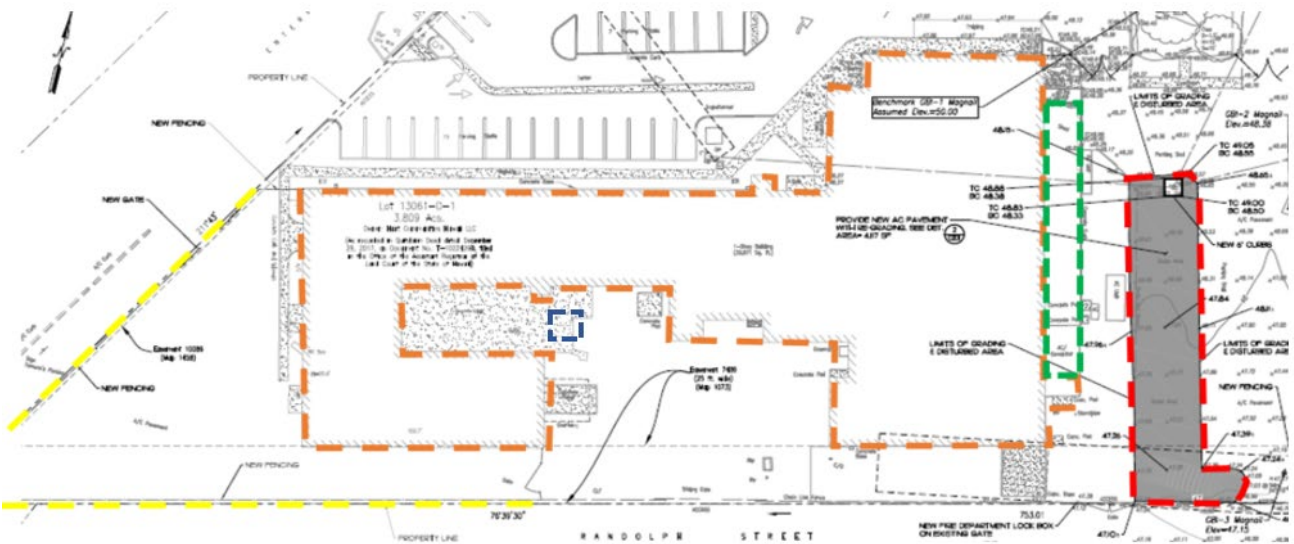
Descriptions of After-The-Fact work (completed in 2021, as shown in **Figure 4, Figure 5, Figure 6, and Figure 7**) and proposed site work (as shown in **Figure 8, Figure 9, Figure 10, and Figure 11**) are listed in the tables below. It should be noted that the UPC, IEBC, IECC, and IBC have been updated since the DPP permit applications (A2021-02-0386, A2021-02-0387, A2022-02-0158, A2022-02-0159) were submitted. We may be required to revise and resubmit those permit sets based on the updated code, however we anticipate the revisions to be minimal.

**Table 1** After-The-Fact Work on Parcel 10, TMK (1) 9-1-013:097 (por.)

DPP Permit #	Description
Consolidated Permit Set used for: - A2021-02-0386 - A2021-02-0387 - GP2021-05-0215	Interior Building Improvements (structural, mechanical, and electrical): <ul style="list-style-type: none"> <li>- Replacement of interior doors</li> <li>- Plumbing improvements, including the replacement of bathroom fixtures</li> <li>- Electrical improvements, including upgrades to lighting and A/C</li> <li>- Fire alarm and fire sprinkler improvements</li> </ul> Exterior Building Improvements: <ul style="list-style-type: none"> <li>- Replacement of two roll up doors front face of the Mauka and Makai and painting               <ul style="list-style-type: none"> <li>o The replacement of the Mauka front façade’s exterior door was enlarged and matches the Makai exterior door in height. The Makai opening stayed the same.</li> </ul> </li> </ul> Other exterior improvements: <ul style="list-style-type: none"> <li>- Removal of existing refrigeration and freezer units located along the exterior of warehouse building</li> <li>- Pavement repairs</li> <li>- Exterior lighting repair and replacement</li> <li>- 8’ chain-link fence was added across the front of the building along Enterprise Avenue and Randolph St.</li> <li>- Grading included excavation of 103 cubic yards of soil over a 4,181 sq. ft area, up to a depth of 8”</li> </ul>
Not Applicable	Swinerton (sublessee) moved into the premises in 2021 and installed a 250-gallon holding tank without HCH approval as shown in <b>Figure 6</b> . HCH reached out to inquire about permits for the holding tank, and Swinerton apologized and explained that the holding tank was removed and infilled with concrete as part of an effort to restore the area to its original condition as shown in <b>Figure 7</b> .



**Figure 4** Photo of Facility 152 taken by MASON in 2021 with After-the-Fact work completed. The structure has been painted black. The enlarged exterior door is outlined in red and the new 8' fence is outlined in yellow.



**Figure 5** Site Plan from sheet C102 in the consolidated building permit set for the After-the-Fact work completed at Parcel 10 (Building Permits A2021-02-0386, A2021-02-0387, and GP2021-05-0215). Location of interior improvements are outlined in orange, removal of existing refrigeration and freezer units is outlined in green, new 8' fence is outlined in yellow, grading is outlined in red (approximately 103 cubic yards (CY) were removed), and Swinerton's install and removal of the 250-gallon holding tank is outlined in dark blue.



**Figure 6** Swinerton (sublessee) installed a 250-gallon holding tank without HCH approval in 2021.



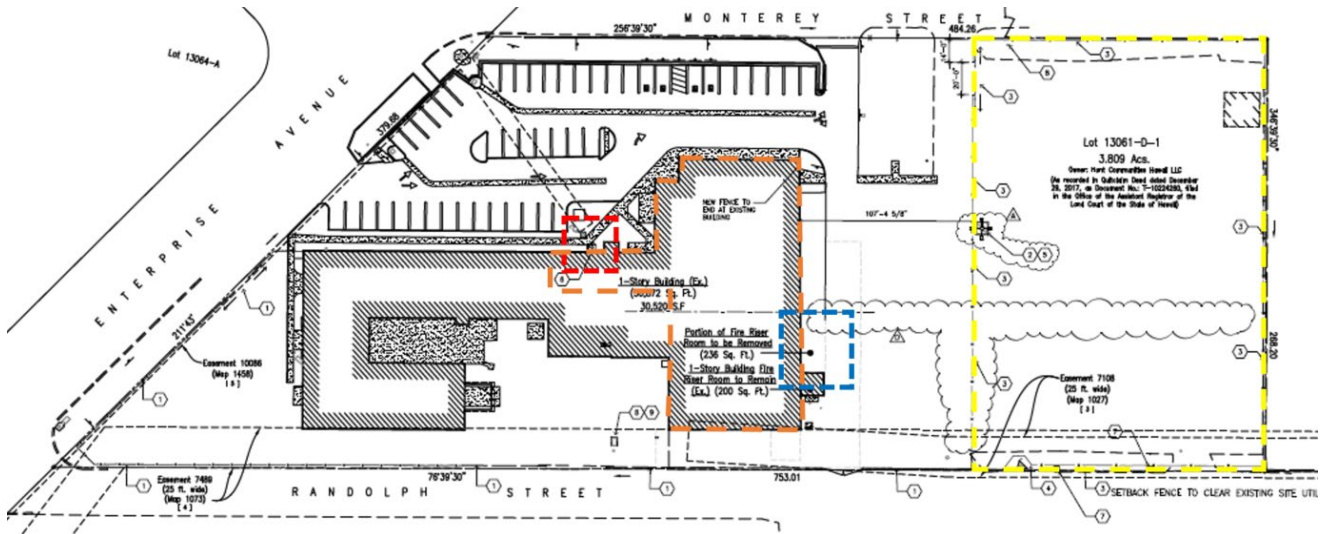
**Figure 7** Swinerton removed the holding tank and infilled with concrete as part of an effort to restore the area to its original condition.

**Table 2** Proposed Work on Parcel 10, TMK (1) 9-1-013:097 (por.)

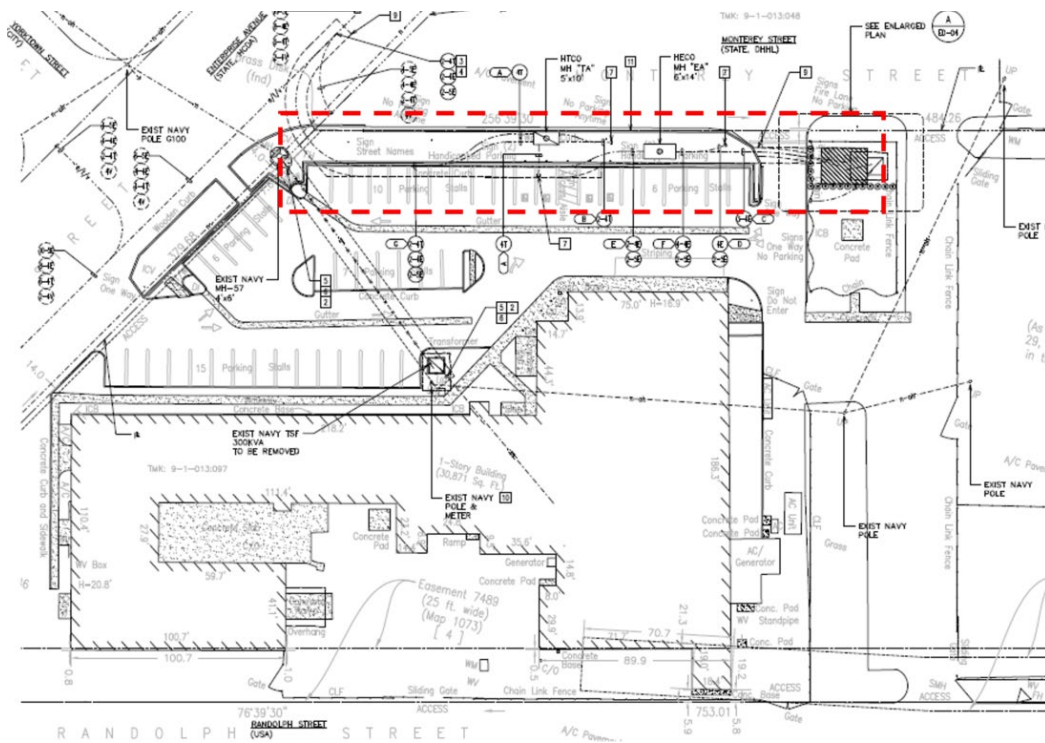
DPP Permit #	Description
Consolidated Permit Set used for: - A2022-02-0158 - A2022-02-0159	Interior Building Improvements (structural, mechanical, and electrical): <ul style="list-style-type: none"> <li>- Fire alarm and fire sprinklers improvements</li> <li>- Electrical improvements, including upgrades to lighting and A/C</li> <li>- Egress corridor alterations to accommodate multiple tenants</li> </ul> Exterior Building Improvements: <ul style="list-style-type: none"> <li>- Removal of a portion of the Fire Riser Room and new roll-up door on the south façade along the non-contributing portion of the building</li> <li>- A new door with an overhang inserted into the north sidewall of the north Quonset hut added in order to meet egress code requirements               <ul style="list-style-type: none"> <li>o This will entail removal of a portion of the existing Quonset wall and one window, which are both character defining features of the building.</li> </ul> </li> </ul> Other exterior improvements: <ul style="list-style-type: none"> <li>- Repair concrete landing on the non-contributing portion of the building.</li> <li>- Removal and replacement of the 6’ chain-link fence located in the back portion of the lot.</li> </ul>
To be submitted	- Installation of an underground electrical line system to provide Hawaiian Electric Service to the building - Majority of ground disturbance depth will be approximately 3’, with boxes installed at a depth of approximately 5’ – 6’
To be submitted	- Installation of an underground electrical line from the transformer to the building - Majority of the ground disturbance depth will be approximately 30”



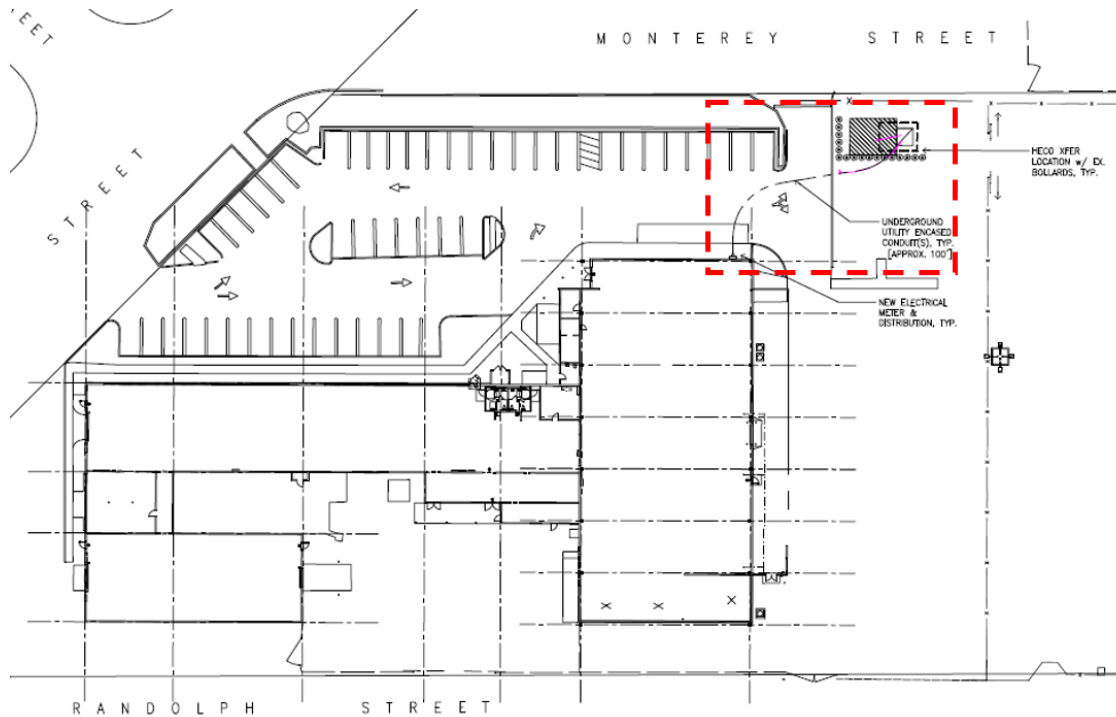
**Figure 8** Proposed new door, overhang, and concrete stoop location outlined in red, on 2021 photo by MASON.



**Figure 9** Site Plan from sheet A001.0 in the consolidated building permit set for the proposed work at Parcel 10 (Building Permits A2022-02-0158 and A2022-02-0159). Location of interior improvements is outlined in orange, removal and replacement of 6' fence is outlined in yellow, repair fire riser room and repair concrete landing on the non-contributing portion of the building is outlined in blue, and the new door with overhang on the north sidewall of the north Quonset hut is outlined in red.



**Figure 10** Electrical plan showing the installation of an underground electrical line segment and transformer. Limits of grading are outlined in red.



**Figure 11** Site Plan showing the underground connection from the transformer to the non-contributing portion of the building outlined in red.

**Submittal History HICRIS Project Number 2022PR00692:**

**After-The-Fact work at Parcel 10, (TMK (1) 9-1-013:097), Parcel 3 (TMK (1) 9-1-013: 128) and Parcel 15 (TMK (1) 9-1-013: 081)**

- On May 27, 2022, HCH submitted a letter requesting a HICRIS project be created for After-The-Fact work at Parcel 10, Parcel 3, and Parcel 15. Also included with this initial submittal was the associated permit applications and permit sets. HICRIS Project Number 2022PR00692 was subsequently assigned.
- On June 2, 2022, MASON uploaded their evaluation of effect of the After-The-Fact work to HICRIS Project Number 2022PR00692 for Parcel 10, Parcel 3, and Parcel 15.
  - o For the After-The-Fact work at Parcel 10 (as summarized in **Table 1**), MASON proposed a finding of “Effect with proposed mitigation commitments” for the change made to the roll-up door at the front façade. MASON proposes Architectural Recordation as mitigation, in the form of a short form Historic American Building Survey (HABS), to include 5 large-format exterior photographs and a written report that describes the building’s evolution over time (starting as two side-by-side Quonset huts and expanding over the years to its current form).

**Parcel 10: After-the-Fact and Proposed Work**

- On May 15, 2023, MASON submitted an evaluation of effects to HICRIS Project Number 2022PR00692 for the proposed work that has not started on Parcel 10 under permit numbers A2022-02-0158 and A2022-02-0159 (described in **Table 2**). MASON believes that the mitigation previously proposed in

June 2022 is sufficient for the additional effects that will be caused by the proposed modification to the Quonset Hut north wall.

- It should be noted that the scope of the proposed work has been simplified since this letter was submitted. The reference to the installation of the roll-up doors on the south façade described on page 2 of the May 13, 2023 letter is no longer in scope.
- On July 21, 2023, HCH submitted Honua’s Archaeological Literature Review and Field Investigation for Parcel 10 (submission #2022PR00692.006). Honua recommends an archaeological monitoring plan be developed in consultation with the SHPD Archaeology Branch.

**Table 3:** Summary of attachments uploaded to HICRIS as described in this letter.

HICRIS File Name	Description
2023-05-15T12-26-37_MASON After the Fact Evaluation of Effect Fac 152 Kalaeloa May 10 2023.pdf	MASON evaluation of effects letter for Parcel 10 proposed and after-the-fact work
2023-07-19T11-24-03_Kalaeloa parcel 10_ALRFI_June_2023_v2 (final) 2023.06.30.pdf	Honua’s Archaeological Literature Review and Field Inspection
2022-05-28T15-44-04_Enclosure C 21_0813 Parcel 10 Bldg Renov (V04)_Consolidated Permit Set-HCDA.pdf	Consolidated Permit set (After-The-Fact work): A2021-02-0386, A2021-02-0387, and GP2021-05-0215
2023-07-21T07-35-43_Parcel 10-Phase 2-Permit Set_RevDeltaD_050123.pdf	Consolidated Permit set (Proposed work): A2022-02-0158 and A2022-02-0159
2023-07-21T08-38-43_Parcel_10 HECO Connection (site) 2023.06.30_rev.pdf	Electrical plan set for proposed underground electrical line segment and transformer
2023-07-21T08-40-02_Parcel 10-Phase 2A-Permit Bldg HECO Connection Set 2023.06.16.pdf	Permit set for the installation of an underground electrical line from the transformer to the building

As stated previously, the HCDA requires SHPD to review the After-the-Fact and Proposed scope of work at Parcel 10. The HCH respectfully requests concurrence and acceptance of these materials and approval that the permitting process can continue. Mahalo for your review of these materials. Please email me at [Kathleen.iriarte@huntcompanies.com](mailto:Kathleen.iriarte@huntcompanies.com) or call me at (808) 437-6522 if you have any additional questions.

Thank you,

**Hunt Communities Hawaii, LLC**  
a Hawaii limited liability company

By: *Kathleen Iriarte*  
Name: Kathleen Iriarte  
Its: Assistant Development Manager





**All revision changes to the document have been made as indicated below in red.**

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]  
**Globally revised, on p.i, pWording .37 and p.38.**
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.  
**Revised on p.1, and new appendix added (new Appendix A); old Appendix A changed to Appendix B.**
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.  
**Information added to Section 3 (pp. 30-31) from MASON, and new SIHP # added for Bldg. # 152.**
4. Page 30. Provide full SIHP # for each site first time referenced.  
**Revised on pp. 30-31.**
5. Page 31, last para. Clarify last sentence. An AMP was generated but not implemented?  
**Rivera and Monahan 2016, which reported the monitoring in an AMR, was added; it was already in Table 1 and in the previous paragraph, but the additional sentence made things more clear.**
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).  
**Information added to address all of these issues in Table 1. A reference was added (IARII plan), and also added to References Cited section.**
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.
  - (a) **Language added to table re NAVFAC 2015 clarifying that the referenced report was a final document;**
  - (b) **Added a footnote to the table that Thurman et al. 2017, in behalf of the U.S. Coast Guard (Lead agency) determined these two sites were not eligible for either National or State registers; no SIHP #s were obtained**
  - (c) **SIHP # for sinkhole burial described in Monahan et al. 2021b was added to this table; it has not been added to Figure 20 since it is well more than 0.5 mile from the project area**
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.  
**Revised as indicated.**
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.  
**Revised – all of this information was added.**
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.

Revised – all of this information was added

11. Page 38, 4) Archaeologist's Role. Revise to indicate they have the authority, not that they will.
12. Revised as indicated.
13. Page 38, 7) Report Preparation. Revise to indicate  
We requested information about this incomplete sentence but did not get a response, so we have not changed anything relative to this incomplete comment.

#### Editorial Comments

All of these edits (item #s 14-18) were addressed on the indicated pages.

14. Page 1, editorial. Change SHPD-Archaeology Branch to remove hyphen. Never spelled this way. Same comment for Page A-1.
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