Appendix 3

3A: Determination of Eligibility, dated January 31, 2020
3B: Notice of Eligibility, dated March 6, 2020
January 31, 2020

Ms. Katia Balassiano, Division Chief
City and County of Honolulu
Department of Planning and Permitting
Land Use Permits Division
650 South King Street, 7th Floor
Honolulu, Hawaii 96813

Subject: Determination of Eligibility Under the City and County of Honolulu Hawai‘i Revised Statutes (HRS) 201H Program for the Kapolei Parkway Affordable Rental Housing, Located at 91-0 Kapolei Parkway, Kapolei, ‘Ewa District, Island of O‘ahu
Tax Map Key: (1) 9-1-160:018, Lots 6 and 7

Dear Ms. Balassiano:

On behalf of the Applicant, Kobayashi Group (KG) LLC and its development entity Kapolei Parkway Partners, LLLP, we request your determination that the Kapolei Parkway affordable rental housing development is eligible to be processed under the City’s 201H Program.

We met with you on October 8, 2019 for a 201H Pre-consultation Meeting to discuss the 201H Project proposal. The preliminary concept has not been modified since then. The Project includes the construction of a new 404-unit affordable rental housing development, comprised of 21 units designated for households earning 30% of the Area Median Income (AMI) or below and 383 units designated for households earning 60% of the AMI or below. An additional unit will be used for an onsite resident manager. The Project would remain affordable for a term of 73 years (lease is for 75 years and includes 2 years for construction).

To assist in your determination, please find enclosed the 201H Determination of Eligibility Form.

It is anticipated that the Project will be exempt from Chapter 343, Hawai‘i Revised Statutes requirements. A request for that exemption has been filed with the Department of Land Management.

Thank-you in advance for your review and determination of this subject request. Should you have questions, please do not hesitate to call me at (808) 220-0936.

Very truly yours,
R.M. Towill Corporation

Keith Kurahashi

Attach.
cc: Mr. Elton Wong, KG
CITY AND COUNTY OF HONOLULU  
DEPARTMENT OF PLANNING AND PERMITTING (DPP)  

201H Program Determination of Eligibility Form

Applicant Name and Contact Information  
Kobayashi Group, LLC  
1288 Ala Moana Blvd., Suite 201,  
Honolulu, Hawaii 96814  
Contact: Mr. Elton Wong  
Telephone: (808) 692-0051, Fax: (808) 524-0766  
Email: ewong@kobayashi-group.com

Project Name, Address, and Tax Map Key  
Kapolei Parkway  
91-0 Kapolei Parkway  
Kapolei, Hawaii 96707  
TMK: (1) 9-1-160:018 [Lots 6 (6.015) & 7 (4.232 acres)]

1. Housing Affordability

i. Target Households and Affordable Units

<table>
<thead>
<tr>
<th>Affordable Units</th>
<th>Number of units</th>
<th>Percent of total units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Restricted at % of AMI*</td>
<td></td>
<td></td>
</tr>
<tr>
<td>30% % of AMI</td>
<td>21 units</td>
<td>5.18 %</td>
</tr>
<tr>
<td>60% % of AMI</td>
<td>383 units</td>
<td>94.57 %</td>
</tr>
<tr>
<td>80% % of AMI</td>
<td>_____ units</td>
<td>0.00 %</td>
</tr>
<tr>
<td>Special Housing Needs**</td>
<td>_____ units</td>
<td>0.00 %</td>
</tr>
</tbody>
</table>

Total Affordable Units  
404 units

Market Rate Units  
1 unit  
0.25 %

Total Number of Units  
405 units  
100.0 %

*AMI = Area Median Income per current HUD standards

** Describe the Special Housing Need of the tenants below, if applicable

ii. Length of Affordability Commitment

Length of affordability restrictions: 73 Years
NOTICE OF ELIGIBILITY
CHAPTER 201H, HAWAII REVISED STATUTES EXEMPTIONS

File No.: 2020/ELOG-222
Project: Kapolei Parkway Affordable Rental Housing
Owner: City and County of Honolulu
Applicant: Kobayashi Group, LLC (Elton Wong)
Agent: R. M. Towill Corporation (Keith Kurahashi)
Location: Kapolei Parkway - Honouliuli
Tax Map Key: 9-1-160: 018 (Lots 6 and 7)
Received: February 3, and March 3, 2020

Request: Determination of Eligibility for AFFORDABLE HOUSING EXEMPTIONS pursuant to Chapter 201H, Hawaii Revised Statutes (HRS), from various planning, zoning, construction and/or development standards for an affordable housing project.

The above application has been reviewed and determined to be ELIGIBLE for processing of affordable housing exemptions by the City and County of Honolulu under Chapter 201H, HRS, subject to the submittal of a Confirmation by the Department of Land Management (DLM) that the Project has been determined exempt from compliance with HRS Chapter 343 requirements.

In addition to the items listed in the 201H Program Application Instructions, we recommend that the following additional information be included when you submit your application:
1. Provide an Income Limit Table showing the maximum income for residents earning an income of 30, 60, and 80 percent of the Area Median Income, including the date and source of the information.

2. The proposed rental rates and estimate of monthly utility costs.

3. We note that the Project's affordable units will be kept as affordable rental units for 73 years (75 years minus 2 years for construction). The application should include a sample of the restrictive covenant that will be recorded with the City DLM.

4. A comprehensive list and explanation of the other permits and/or approvals that the Project will require and text explaining the status of those permits.

5. All requested exemptions should be identified and the land use ordinance sections from which you seek exemptions should be specified and justified.

Should you have any questions, please contact Steve Tagawa, cf our staff, at 768-8024.

Kathy K. Sokugawa
Acting Director

Date: March 6, 2020
Appendix 4

Draft Archaeological Literature Review and Field Inspection to Support Consultation with SHPD for the Kapolei Parkway Project, Honouliuli Ahupu’a, ‘Ewa District, O’ahu TMK: [1] 9-1-160-018p, Lots 6 and 7, and Manawai Street and Wakea Street Extensions
Draft
Archaeological Literature Review and Field Inspection to Support Consultation with SHPD for the Kapolei Parkway Project, Honouliuli Ahupua‘a, ‘Ewa District, O‘ahu TMK: [1] 9-1-160-189p, Lots 6 and 7, and Manawai Street and Wakea Street extensions

Prepared for
Kobayashi Group

Prepared by
Gina M. Farley, M.A.,
and
Matt McDermott, M.A.

Cultural Surveys Hawai‘i, Inc.
Kailua, Hawai‘i
(Job Code: HONOULIULI 180)

February 2020

O‘ahu Office
P.O. Box 1114
Kailua, Hawai‘i 96734
Ph.: (808) 262-9972
Fax: (808) 262-4950

Maui Office
1860 Main St.
Wailuku, Hawai‘i 96793
Ph.: (808) 242-9882
Fax: (808) 244-1994

www.culturalsurveys.com
# Management Summary

<table>
<thead>
<tr>
<th>Reference</th>
<th>Archaeological Literature Review and Field Inspection to Support Consultation with SHPD for the Kapolei Parkway Project, Honolulu, Ahupua'a, 'Ewa District, O'ahu, TMK: 9-1-160-189p, Lots 6 and 7, and Manawai Street and Wakea Street extensions (Farley and McDermott 2020)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date</td>
<td>February 2020</td>
</tr>
<tr>
<td>Project Number(s)</td>
<td>Cultural Surveys Hawai'i, Inc. (CSH), Job Code: HONOLULULI 180</td>
</tr>
<tr>
<td>Investigation Permit Number</td>
<td>CSH completed the fieldwork component of this study under archaeological fieldwork permit number 19-07, issued by the Hawai'i State Historic Preservation Division (SHPD) per Hawai'i Administrative Rules (HAR) §13-13-282.</td>
</tr>
<tr>
<td>Agencies</td>
<td>SHPD, Hawaii Housing Finance and Development Corporation (HHFDC), City and County of Honolulu Department of Land Management (DLM)</td>
</tr>
<tr>
<td>Project Land Jurisdiction</td>
<td>City and County of Honolulu</td>
</tr>
<tr>
<td>Project Funding</td>
<td>HHFDC</td>
</tr>
<tr>
<td>Project Proponent</td>
<td>Kobayashi Group</td>
</tr>
<tr>
<td>Project Location</td>
<td>The proposed project is abutting and south of abutting Kapolei Parkway, between Wakea and Kunehi streets, in Honolulu, Ahupua'a, 'Ewa District, O'ahu, TMK: 9-1-160-189p, Lots 6 and 7. The project area also includes adjacent Manawai Street and Wakea Street extensions. It is depicted on a portion of the 1998 Ewa U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle (Figure 1), a tax map plat (Figure 2), and a 2018 aerial photograph (Figure 3).</td>
</tr>
<tr>
<td>Built Environment</td>
<td>As documented during the field inspection, the project area includes two adjacent, roughly rectangular-shaped lots separated by a chain link fence (see Figure 3 through Figure 14). The western lot (Lot 6) is between Wakea and Manawai streets, and the eastern lot (Lot 7) is between Manawai and Kunehi streets. There are two areas of paved asphalt within the project area—at the southwest corner by Wakea Street and at the intersection of the two lots by Manawai Street (see Figure 1 and Figure 11). Based on a review of aerial photographs (see Figure 33 and Figure 34) and field observations made during a 15 November 2019 field inspection (see Figure 5 and Figure 12), significant mining and stockpiling of limestone bedrock appears to have occurred within the project area in the last ca. 15 years. This has resulted in the central portion of the project area being approximately 5 ft lower than the perimeter (see Figure 14). Three concrete and/or mortared basalt</td>
</tr>
</tbody>
</table>
culverts are present in this central portion of the project area (see Figure 7 through Figure 9).

| Natural Environment | The project area is approximately 3.2 km (2 miles) inland and 18–20 m (59.1–65.6 feet [ft]) above sea level. Land along the perimeter of the project area is approximately 5 ft higher than the land within the central portion. The average temperature is 23.7° C (74.6° F) (Giambelluca et al. 2014), and annual rainfall averages approximately 550 mm (21.7 inches) (Giambelluca et al. 2013), with most of the rain falling between October and March. Vegetation within the project area consists primarily of grass, approximately 1–3 ft tall, and koa haole (Leucaena leucocephala) trees. According to the U.S. Department of Agriculture (USDA) Soil Survey Geographic (SSURGO) database (2001) and soil survey data gathered by Foote et al. (1972), the project area’s soils consist of Mamala stony silty clay loam, 0 to 12% slopes (MnC), in the far western portion of the project area, and Honouliuli clay, 0 to 2% slopes (HxA), in the remainder of the project area. The Mamala Series is described as follows: This series consists of shallow, well-drained soils along the coastal plains on the islands of Oahu and Kauai. These soils formed in alluvium deposited over coral limestone and consolidated calcareous sand [...] These soils are used for sugarcane, truck crops, orchards, and pasture. The natural vegetation consists of kiawe, koa haole, bristly foxtail, and swollen fingergrass. [Foote et al. 1972:93] The Honouliuli Series is described as follows: This series consists of well-drained soils on coastal plains on the island of Oahu in the Ewa area. These soils developed in alluvium derived from basic igneous material [...] These soils are used for sugarcane, truck crops, orchards, and pasture. The natural vegetation consists of kiawe, koa haole, bristly foxtail, and swollen bermudagrass. [Foote et al. 1972:43] |

| Project Description | The proposed project involves the construction of affordable housing and adjacent portions of Manawai and Wakea streets to City standards (Figure 16 and Figure 17). The Kobayashi Group will have a long-term lease (75 years) of Lots 6 and 7 and will manage the affordable housing project during its construction and use. The roadway extension of Manawai and Wakea streets will be improved by the Kobayashi Group and will continue to be owned by the City. The property will be filled, |
and ground-disturbing activities will include excavations for utility installation and building footings/foundations. The proposed housing will include two- to three-story buildings with 404 living units consisting of studios and one- to four-bedroom apartments. The development will also include preschool, recreation, and laundry facilities, as well as a park and parking lots.

**Project Acreage**

| TMK: [1] 9-1-160-189p, Lot 6, is 6.01 acres (2.43 hectares); Lot 7 is 4.23 acres (1.71 hectares). Development will also include the adjacent portions of Wakea (0.605 acre) and Manawai streets (0.444 acre), which will be constructed as part of the project. Hence, the total project acreage is 11.296 acres (4.57 hectares). |

**Historic Preservation Context**

This is a state/municipal "governmental" project needing review under Hawai‘i Revised Statutes (HRS) §6E-8 and HAR §13-275. HRS §6E-8 compliance will be triggered by HHFDC approvals and funding. There is no federal involvement that would trigger compliance with federal historic preservation review legislation (e.g., Section 106 of the National Historic Preservation Act).

**Document Purpose**

This investigation was designed—through historical, cultural, and archaeological background research and a field inspection of the project area—to determine the likelihood that historic properties may be affected by the proposed project and, based on findings, to consider cultural resource management recommendations. This document is intended to facilitate the project’s planning and to support the project’s historic preservation review compliance. This investigation does not fulfill the requirements of an archaeological inventory survey (AIS) investigation, per HAR §13-276.

This information also supports consultation with the SHPD regarding the project’s necessary historic preservation review steps pursuant to HAR §13-275.

**Background Research Methods**

Background research included a review of previous archaeological studies on file at the SHPD; review of documents at Hamilton Library at the University of Hawai‘i at Mānoa, the Hawai‘i State Archives, the Mission Houses Museum Library, the Hawai‘i Public Library, and the Bishop Museum Archives; study of historical photographs at the Hawai‘i State Archives and the Bishop Museum Archives; and study of historical maps at the Survey Office of the Department of Land and Natural Resources (DLNR). Historical maps and photographs from the CSH library were also consulted. In addition, Māhele records were examined from the Waihona ‘Aina database (Waihona ‘Aina 2019).

This research provided the environmental, cultural, historical, and archaeological background for the project area. Historical maps and aerial photographs (Figure 18 through Figure 35) provide a cultural
context and chronology of the changing landscape of the project area and surrounding vicinity.

**Background Research**

Honouliuli Ahupua'a had tremendous and varied resources available for exploitation by early Hawaiians. The long coastline fronting the calm waters of leeward O'ahu offered rich marine resources, while Honouliuli Valley offered rich alluvial soils with plentiful water for irrigation from streams and springs. The upland forest zone produced a variety of species, including kukui (*Aleurites moluccana*), 'ōhia (*Metrosideros polymorpha*), 'iliahi (sandalwood; *Santalum ellipticum*), hau (*Hibiscus tiliaceus*), ʻiʻi (*Cordyline fruticosa*), and banana (*Musa* spp.). The broad limestone plain, with numerous sinkholes, offered a nesting place for a large population of avifauna—a resource that may have been one of the early attractions for human settlement (Tulchin and Hammatt 2009:10).

The political and cultural center of the *ahupua'a* (traditional land division) is understood to have been the relatively dense settlement and rich lands for irrigated taro cultivation at the 'ili (traditional land division smaller than an *ahupua'a*) of Honouliuli, where Honouliuli Stream empties into the north portion of West Loch, approximately 5 km northeast of the current project area (see Figure 18 and Figure 20). Pu'ukapolei, approximately 0.6 km north of the current project area, was one of the most sacred places in Honouliuli (Sterling and Summers 1978:33) (see Figure 18, Figure 19, Figure 24, Figure 25, and Figure 27 through Figure 32). McAllister (1933:108) records that a *heiau*, or temple, was constructed on Pu'ukapolei (Site 138, see Figure 37); however, it was destroyed prior to his survey in the early 1930s. The *heiau* may have been associated with the sun (Fornander 1920:3:292). The hill was used as a point of solar reference or as a place where such observations were made. Pu'ukapolei was also the primary landmark for travelers between Pearl Harbor and the west O'ahu coast, with a main trail running just inland of it (ʻĪ'i 1959:27, 29) (see Figure 18 through Figure 20).

Hawaiian legends and early historical accounts indicate the *ahupua'a* of Honouliuli was once widely inhabited by pre-Contact Hawaiian populations, including the *ali'i* (chiefly class). This substantial population was supported by the plentiful marine and estuarine resources available at the coast. Other attractive subsistence-related features of the *ahupua'a* included irrigated lowlands suitable for wetland taro cultivation (Hammatt and Shideler 1990), as well as the lower forest area of the mountain slopes for the procurement of forest goods. However, the presence of archaeological sites along the coral plains and coast of southwest Honouliuli indicates pre- and early post-Contact populations also adapted to less inviting areas, despite the environmental hardships. It is worth noting an 1825 map indicates a
“Freshwater Pond” within the current project area (see Figure 20); however, this map appears to be fairly schematic. An 1899 Beasley map of Oahu (see Figure 21) providing a more detailed, close-up view of the project area and surrounding vicinity indicates the pond was southwest of the project area.

It is through Land Commission records generated during the mid-nineteenth century Māhele that the first specific documentation of life in Hounouliuli Ahupua’a, as it had evolved up to that time, comes to light. Although 99 kuleana (commoner) land claims were awarded in Hounouliuli, none were in the vicinity of the current project area (Indices of Awards 1929). The vast majority were near the Pu’uola Salt Works and the taro lands of the ā‘ī of Hounouliuli, well east of the current project area. The largest award (Royal Patent 6071, Land Commission Award 11216, Āpana [lot] 8) granted in Hounouliuli Ahupua’a was to Miriam Ke‘ahi-Kuni Kekau‘onohi on January 1848 (Native Register 1847). Kekau‘onohi acquired a deed to all unclaimed land within the ahupua’a, totaling 43,250 acres.

Kekau‘onohi was one of Liholiho’s (Kamehameha II’s) wives. After his death, she became a wife of Chief Levi Ha‘alelea. Upon her death in 1851, her property passed to her husband and his heirs. When Levi Ha‘alelea died, the property went to his surviving wife, who in turn leased it to James Dowsett and John Meek in 1871 for stock running and grazing.

In 1877, James Campbell purchased most of Hounouliuli Ahupua’a for $95,000. He drove off 32,347 head of cattle belonging to Dowsett, Meek, and James Robinson and constructed a fence around the outer boundary of his property (Bordner and Silva 1983:C-12). In 1879, Campbell brought in a well-driller from California to search the ‘Ewa plains for water, and a “vast pure water reserve” was discovered (Armstrong 1937). Following this discovery, plantation developers and ranchers drilled numerous wells in search of the valuable resource. By 1881, the Campbell property at Hounouliuli prospered as a cattle ranch with “abundant pasturage of various kinds” (Briggs 1926).

In 1889, Campbell leased his property to Benjamin Dillingham, who subsequently formed the Oahu Railway & Land Company (OR&L) in 1890. The OR&L passed approximately 0.5 km south of the current project area (see Figure 21 and Figure 23 through Figure 25). To attract business to his new railroad system, Dillingham subleased all land below 200 ft elevation to William Castle, who in turn sublet the area to the Ewa Plantation Company for sugarcane cultivation (Frierson 1972:15). The Ewa Plantation Company was first incorporated in 1890 and was largely self-sufficient until it merged with The Oahu Sugar Company in 1970, continuing operations into the 1990s. Historical
maps indicate the current project area was within the Ewa Plantation, within Fields 15.1 and 15.2 (see Figure 21, Figure 22, and Figure 26). Historical maps also indicate significant commercial sugarcane development in the vicinity of the project area, including a plantation railroad approximately 0.2 km north of the project area (see Figure 23 through Figure 27).

Major land use changes came to western Honouliuli when the U.S. Military began development in the area. Military installations were constructed near the coast and in the foothills and upland areas. Naval Air Station Barbers Point, in operation from 1942 until the 1990s, was the largest and most significant base built in the area; it is approximately 0.6 km south of the current project area (see Figure 27, Figure 29, and Figure 32). 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. Fort Barrette (a.k.a. Kapolei Military Reservation and Battery Hatch) atop Pu'ukapolei, approximately 0.6 km north of the project area, was in use from 1931-1948, housing four 3-inch anti-aircraft batteries (Payette 2003). In the 1950s, the site was used as a Nike missile base. However, based on available maps and aerial photographs, as well as prior archaeological studies, there is no evidence for military land use within the current project area.

A series of recent aerial photographs (see Figure 33 through Figure 35) indicates the project area has been substantially affected by what appears to be mining and stockpiling of limestone bedrock within the last ca. 15 years.

### Prior Archaeological Studies

One prior archaeological study (Haun 1986) has been conducted within the current project area, and one study (Dagher and Spear 2009) is adjacent to the current project; neither of these investigations included subsurface testing. No historic properties have been identified previously within the project area, but three (State Inventory of Historic Places [SIHP] #s 50-80-12-0138, -5919, and -9714) are in the general vicinity. Previous archaeological studies in the vicinity of the project area are presented in Figure 36 and summarized in Table 1. Historic properties previously identified in the vicinity are presented in Figure 37 and summarized in Table 2. They are discussed below.

Haun (1986) conducted an archaeological reconnaissance survey of a 1,400-acre parcel in Makakilo/Kapolei, which included the current project area. Two potential historic properties, an irrigation ditch and a World War II military structure, were identified; however, both are well outside the current project area. Haun (1986:3) noted,
the area has been extensively modified in recent times, primarily by sugarcane cultivation. Oahu Sugar Company, Limited currently [as of 1986] cultivates all of the project area situated on the seaward side of Farrington Highway and the H-1 Freeway [including the current project area] [...]. This cultivation has involved extensive grading as evidenced by several large piles of boulders [...].

In addition, Haun (1986) noted two previously identified historic properties adjacent to the study area, which are in the vicinity of the current project area. The first is SIHP # -9714, OR&L right-of-way, approximately 0.5 km south of the current project area. The second is SIHP # -0138, Pu‘u Kapeolei Heiau (McAllister’s Site 138), formerly on the slopes of Pu‘uokapolei approximately 0.5 km north of the current project area; however, this heiau was destroyed by the time of McAllister’s 1930s survey.

Dagher and Spear (2009) conducted an archaeological literature review and field inspection along Kapolei Parkway, adjacent to the current project area; no historic properties were identified. Dagher and Spear (2009:15) reported that

adjacent areas outside the project corridor on both [...] sides are currently under agriculture. No evidence of flumes, ditches, or other historic or cultural materials was visible on the ground surface either in the roadway corridor or the adjacent portions [...] the entire road corridor area has been grubbed, graded, and filled [...].

No further archaeological work was recommended.

In addition to SIHP #s -0138 and -9714, noted by Haun (1986), a third historic property has been identified in the general vicinity of the current project area: SIHP # -5919, Fort Barrette structural remnants. Approximately 0.5 km north of the current project area, these remnants include magazines, pillboxes, gun emplacements, an engine shed, terraces, an electric substation, a power plant, a platform, a mound, a petroglyph, a latrine, retaining walls, and other buildings/structures (Ostroff et al. 2001).

<table>
<thead>
<tr>
<th>Background Summary and Predictive Model</th>
</tr>
</thead>
<tbody>
<tr>
<td>Background research suggests the project area was not heavily utilized by Native Hawaiians during the pre- and early post-Contact periods, as evidenced by the lack of kuleana land claims in the vicinity (the vast majority were in the ‘ili of Honouliuli, approximately 5 km northeast of the current project area). Furthermore, any evidence of Native Hawaiian land use likely would have been destroyed by subsequent activities related to cattle ranching, sugarcane agriculture, and the mining of</td>
</tr>
</tbody>
</table>

LRFI for the Kapolei Parkway Project, Honouliuli, ‘Ewa, O‘ahu

TMK: [1] 9-1-160-189p, Lots 6 and 7, and Manawai St and Wakea St extensions
limestone bedrock, as evidenced by historical maps, as well as historical and more recent aerial photographs. The only prior archaeological study within the current project area—a reconnaissance survey by Haun (1986)—failed to identify any potential historic properties within the current project area, and Haun (1986:3) noted the area had been “extensively modified in recent times, primarily by sugarcane cultivation,” which involved “extensive grading.”

| Fieldwork Effort | CSH archaeologists Gina Farley, M.A., and Cody James, M.A., conducted the field inspection on 15 November 2019. It took approximately 0.75 person-day to complete. The inspection began at the southwest corner of the project area and proceeded generally in a counter-clockwise direction around the western lot (Lot 6), followed by the eastern lot (Lot 7) (see Figure 4 through Figure 14).

There are two areas of paved asphalt within the project area—at the southwest corner by Wakea Street and at the intersection of the two lots by Manawai Street (see Figure 4 and Figure 11). The rest of the project area is typically over-grown with moderately thick vegetation (see Figure 6, Figure 10, and Figure 13), although limestone bedrock was exposed in several areas (see Figure 5, Figure 6, and Figure 10). No limestone pit caves were observed. In some places, the bedrock appeared to have been carved out/graded (see Figure 5), and the central portion of the project area is approximately 5 ft lower than the perimeter (see Figure 14). In addition, limestone boulder push piles were observed in the eastern lot (Lot 7) (see Figure 12). These field observations are consistent with the mining and stockpiling of limestone bedrock within the last ca. 15 years that was suggested through background research of aerial photographs (see Figure 33 through Figure 35). They are also consistent with the findings of Haun’s (1986:3) archaeological reconnaissance survey of the project area and surrounding vicinity, which noted “extensive grading as evidenced by several large piles of boulders.”

Standing water was observed in the central portion of the project area, and drainage infrastructure, including culverts, composed of mortared basalt and/or concrete were identified (see Figure 7 through Figure 9). These were documented with scaled photographs but were determined not to be historic; rather, they post-date the mining of limestone bedrock that occurred within the project area in the last ca. 15 years. This grading is further evidenced by the presence of limestone boulder push piles in the eastern lot (Lot 7) (see Figure 12). The only cultural materials observed on the ground surface during the field inspection were modern rubbish. No evidence of the former sugarcane plantation was observed. |

| Consultation | On 21 November 2019, Matt McDermott and Ena Sroat of CSH met with Dr. Susan Lebo of the SHPD to discuss a number of projects, |
including the current Kapolei Parkway project. Mr. McDermott presented an overview of the current project and the City’s and/or the HHFDC’s intent to submit an HRS §6E submittal form with a determination of “no historic properties affected.”

On 18 December 2019, Matt McDermott of CSH gave a presentation at the O'ahu Island Burial Council (OIBC) meeting, providing an overview of the project and its historic preservation review. No questions or objections were raised.

<table>
<thead>
<tr>
<th>Potential for Project Effect on Archaeological Historic Properties</th>
</tr>
</thead>
<tbody>
<tr>
<td>No historic properties have been identified previously within the project area, and none were identified during the current investigation. As the project area was in sugarcane cultivation for approximately a century, any evidence of traditional Hawaiian activity that may have once existed was likely destroyed long ago. Likewise, evidence of the former plantation appears to have been destroyed by subsequent limestone mining and stockpiling activities. Hence, the potential for subsurface archaeological historic properties within the project area is very low.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Historic Preservation Review Steps</th>
</tr>
</thead>
<tbody>
<tr>
<td>Based on the findings of the current study, an AIS is not warranted for the project. Furthermore, the potential for the project to affect archaeological historic properties is low enough that an archaeological monitoring program during project construction is not warranted. Hence, pursuant to HAR §13-275-5(h), a project effect determination of “no historic properties affected” is appropriate, and no further historic preservation review steps are warranted.</td>
</tr>
</tbody>
</table>

If potential archaeological historic properties (including potential burial sites) are found during project construction, work will stop immediately, and the SHPD will be notified pursuant to HAR §13-280-3 (for potential non-burial site archaeological historic properties) and, if appropriate, HAR §13-300-40 (for potential inadvertent discovery of human skeletal remains).
Figure 1. A portion of the 1998 Ewa USGS 7.5-minute topographic quadrangle, showing the project area
Figure 2. Tax Map Key (TMK) Plat [1] 9-1-160, showing the project area (Hawai’i TMK Service 2014)
Figure 3. Aerial photograph (Google Earth 2018), with overlay of the project area; green arrows indicate the location and direction of field inspection photographs shown in Figure 4 through Figure 14.
Figure 4. Taken from the southwest corner of the project area, view to northeast

Figure 5. Limestone bedrock, which appears to have been carved out, view to east
Figure 6. Middle portion of western lot (Lot 6), view to northeast

Figure 7. Mortared basalt and concrete culvert, view to east
Figure 8. Mortared basalt stormwater runoff feature, view to southwest

Figure 9. Concrete culvert, view to northeast
Figure 10. Taken from the northwest corner of the project area, view to east

Figure 11. Taken near Manawai Street, view to northeast

LRFI for the Kapolei Parkway Project, Honolulu, ‘Ewa, O‘ahu

TMK: [1] 9-1-160-189p, Lots 6 and 7, and Manawai St and Wakea St extensions
Figure 12. Limestone boulder push piles in the eastern lot (Lot 7), evidencing limestone mining/stockpiling within the project area, view to west

Figure 13. Taken from the northeast corner of the project area, view to south
Figure 14. Taken from the northeast corner of the project area, showing the central portion of the parcel is ca. 5 ft lower than the perimeter, view to east; Kapolei Parkway on right
Figure 15. Overlay of Soil Survey of the State of Hawaii (Foote et al. 1972), indicating soil types within and surrounding the project area (USDA SSURGO 2001)
Figure 16. Overall site plan (courtesy of client)

LRFI for the Kapolei Parkway Project, Honouliuli, ‘Ewa, O‘ahu

TMK: [1] 9-1-160-189p, Lots 6 and 7, and Manawai St and Wakea St extensions
Figure 17. Massing study perspectives (courtesy of client)

LRFI for the Kapolei Parkway Project, Honolulu, ‘Ewa, O‘ahu

TMK: [1] 9-1-160-189p, Lots 6 and 7, and Manawai St and Wakea St extensions
Figure 18. USGS orthoimagery aerial photographs (2011), with overlay of Honouliuli place names and the project area
Figure 19. Rockwood map of trails of Leeward Oʻahu, ca. 1810 (ʻĪrī 1959:96), showing the project area
Figure 20. A portion of the 1825 Malden map of the South Coast of Oahu (RM 640), showing a “Freshwater Pond” within the project area; however, the more detailed map in Figure 21 below indicates the pond was actually southwest of the project area.

LRFI for the Kapolei Parkway Project, Honolulu, ‘Ewa, O‘ahu

TMK: [1] 9-1-160-189p, Lots 6 and 7, and Manawai St and Wakea St extensions
Figure 21. A portion of the 1899 Beasley map of Oahu, showing the project area within the Ewa Plantation

LRFI for the Kapolei Parkway Project, Honolulu, ‘Ewa, O‘ahu
TMK: [1] 9-1-160-189p, Lots 6 and 7, and Manawai St and Wakea St extensions
Figure 22. A portion of the 1906 Donn Hawaii Territory Survey map of Oahu with Land Use (RM 2374), showing the project area within the Ewa Plantation
Figure 23. A portion of the 1919 U.S. Army War Department fire control map, Barbers Point and Nanakuli quadrangles, showing the project area surrounded by plantation infrastructure.

LRFI for the Kapolei Parkway Project, Honouliuli, 'Ewa, O'ahu

TMK: [1] 9-1-160-189p, Lots 6 and 7, and Manawai St and Wakea St extensions
Figure 24. A portion of the 1928 Barbers Point and 1929 Waianae USGS topographic quadrangles, showing the project area surrounded by plantation infrastructure.
Figure 25. A portion of the 1936 U.S. Army War Department terrain map, Barbers Point and Waianae quadrangles, showing the project area surrounded by plantation infrastructure.
Figure 26. 1939 Ewa Plantation Company field map (Condé and Best 1973:285), showing the project area within Fields 15.1 and 15.2
Figure 27. A portion of the 1943 U.S. Army War Department terrain map, Barbers Point, Ewa, and Waipahu quadrangles, showing the project area surrounded by plantation infrastructure.
Figure 28. 1951 USGS aerial photograph of Barbers Point (UH MAGIS), showing the project area within two agricultural fields
Figure 29. A portion of the 1953 Ewa USGS topographic quadrangle, showing the project area
Figure 30. 1962 USDA aerial photograph of Barbers Point (UH MAGIS), showing the project area within agricultural fields
Figure 31. 1968 USGS aerial photograph of Barbers Point (UH MAGIS), showing the project area within agricultural fields.

LRFI for the Kapolei Parkway Project, Honolulu, ‘Ewa, O‘ahu

TMK: [1] 9-1-160-189p, Lots 6 and 7, and Manawai St and Wakea St extensions
Figure 32. A portion of the 1968 Ewa USGS topographic quadrangle, showing the project area.
Figure 33. 2004 aerial photograph of the project area; divisions between former sugarcane fields are faint but still visible (Google Earth 2004)
Figure 34. 2006 aerial photograph of the project area, showing grading, potentially limestone mining, and stockpiling within the eastern lot (Lot 7) and surrounding vicinity (Google Earth 2006)

LRFI for the Kapolei Parkway Project, Honouliuli, ‘Ewa, O‘ahu

TMK: [1] 9-1-160-189p, Lots 6 and 7, and Manawai St and Wakea St extensions
Figure 35. 2013 aerial photograph of the project area, showing grading within the western lot (Lot 6) and surrounding vicinity; Kapolei Parkway and Manawai and Kunehi streets have been constructed, and a residential development is south of Lot 7 (Google Earth 2013)

LRFI for the Kapolei Parkway Project, Honolulu, ‘Ewa, O‘ahu

TMK: [1] 9-1-160-189p, Lots 6 and 7, and Manawai St and Wakea St extensions
Figure 36. A portion of the 1998 Ewa USGS 7.5-minute topographic quadrangle, with overlay of previous archaeological studies in the vicinity of the project area
Table 1. Previous archaeological studies in the vicinity of the project area

<table>
<thead>
<tr>
<th>Reference</th>
<th>Type of Investigation</th>
<th>General Location</th>
<th>Results (SIHP # 50-80-12-)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oshima 1975</td>
<td>Archaeological reconnaissance survey</td>
<td>Campbell Industrial Park Complex</td>
<td>No historic properties identified in vicinity of current project area</td>
</tr>
<tr>
<td>Clark 1977</td>
<td>Archaeological reconnaissance survey</td>
<td>Pu‘u Kapolei</td>
<td>Noted 20+ late historic military structures, including bunkers, barracks, and a chapel (no SIHP # assigned); no further archaeological work recommended</td>
</tr>
<tr>
<td>Haun 1986</td>
<td>Archaeological reconnaissance survey</td>
<td>1,400 acres in Makakilo/Kapolei</td>
<td>No historic properties identified in vicinity of current project area</td>
</tr>
<tr>
<td>Rosendahl 1987</td>
<td>Archaeological reconnaissance survey</td>
<td>Kapolei Village</td>
<td>Documented SIHP # -9714, OR&amp;L ROW</td>
</tr>
<tr>
<td>Haun and Kelly 1991</td>
<td>Archaeological inventory survey</td>
<td>Naval Air Station Barbers Point</td>
<td>No historic properties identified in vicinity of current project area</td>
</tr>
<tr>
<td>Kennedy 1991</td>
<td>Archaeological inventory survey</td>
<td>Pu‘u Kapolei</td>
<td>Noted 14 U.S. Army structures from 1942 (no SIHP # assigned); late historic cultural materials identified in subsurface testing</td>
</tr>
<tr>
<td>Landrum and Schilz 1993</td>
<td>Archaeological reconnaissance survey with limited subsurface testing</td>
<td>Naval Air Station Barbers Point</td>
<td>No historic properties identified in vicinity of current project area</td>
</tr>
<tr>
<td>Tuggle and Tumonari-Tuggle 1997</td>
<td>Archaeological inventory survey</td>
<td>Naval Air Station Barbers Point</td>
<td>No historic properties identified in vicinity of current project area</td>
</tr>
<tr>
<td>McIntosh and Cleghorn 1999</td>
<td>Archaeological archival research</td>
<td>Honouliuli Wastewater Treatment Plant</td>
<td>Concludes likelihood for subsurface historic properties low; if historic properties are present, they are likely sinkholes containing cultural materials, possibly including human remains</td>
</tr>
<tr>
<td>Reference</td>
<td>Type of Investigation</td>
<td>General Location</td>
<td>Results (SIHP # 50-80-12-)</td>
</tr>
<tr>
<td>----------------------------</td>
<td>----------------------------------------------------</td>
<td>----------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Ostroff et al. 2001</td>
<td>Archaeological inventory survey</td>
<td>Pu‘u Kapolei</td>
<td>Identified SIHP # -5919, Fort Barrette structural remnants, in vicinity of current project area</td>
</tr>
<tr>
<td>O’Hare et al. 2005</td>
<td>Archaeological assessment and cultural impact evaluation</td>
<td>Palailai and Makakilo Interchanges</td>
<td>No historic properties identified in vicinity of current project area</td>
</tr>
<tr>
<td>O’Leary and Hammatt 2005</td>
<td>Archaeological literature review and field inspection</td>
<td>Fort Barrette Rd</td>
<td>Identified three historic properties: SIHP # -9714, OR&amp;L ROW; SIHP # -0138, Pu‘u Kapolei Heiau; and SIHP # -5919, Fort Barrette retaining wall</td>
</tr>
<tr>
<td>Rasmussen and Tomonari-Tuggle 2006</td>
<td>Archaeological monitoring</td>
<td>Waiau fuel pipeline</td>
<td>No historic properties identified</td>
</tr>
<tr>
<td>Dagher and Spear 2009</td>
<td>Archaeological literature review and field inspection</td>
<td>Kapolei Parkway</td>
<td>No historic properties identified</td>
</tr>
<tr>
<td>Tulchin and Hammatt 2009</td>
<td>Archaeological inventory survey</td>
<td>2-acre parcel, Kapolei</td>
<td>No historic properties identified</td>
</tr>
<tr>
<td>Hammatt et al. 2013</td>
<td>Archaeological inventory survey</td>
<td>Along OR&amp;L ROW</td>
<td>Documented SIHP # -9714, OR&amp;L ROW</td>
</tr>
<tr>
<td>Yucha et al. 2014</td>
<td>Supplemental archaeological inventory survey</td>
<td>Kapolei Interchange</td>
<td>No historic properties identified in vicinity of current project area</td>
</tr>
</tbody>
</table>

Table 2. Historic properties previously identified in the vicinity of the project area

<table>
<thead>
<tr>
<th>SIHP # 50-80-12-</th>
<th>Formal Type/Name</th>
<th>Comment</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site 138</td>
<td>Pu‘u Kapolei Heiau</td>
<td>Destroyed by the time of McAllister’s 1930 survey</td>
<td>McAllister 1933</td>
</tr>
<tr>
<td>5919</td>
<td>Fort Barrette Complex</td>
<td>Includes magazines, pillboxes, gun emplacements, engine shed, terraces, electric substation, power plant, platform, mound, petroglyph, latrine, retaining walls, and other buildings/structures</td>
<td>Ostroff et al. 2001; O’Leary and Hammatt 2005</td>
</tr>
<tr>
<td>9714</td>
<td>OR&amp;L ROW</td>
<td>–</td>
<td>Rosendahl 1987; O’Leary and Hammatt 2005; Hammatt 2013</td>
</tr>
</tbody>
</table>
Figure 37. A portion of the 1998 Ewa USGS 7.5-minute topographic quadrangle, with overlay of previously identified historic properties in the vicinity of the project area; all SIHP numbers are prefaced by 50-80-12

LRFI for the Kapolei Parkway Project, Honolulu, ʻEwa, Oʻahu
TMK: [1] 9-1-160-189p, Lots 6 and 7, and Manawai St and Wakea St extensions
References Cited

Armstrong, Fred E.

Beasley, T.D.

Bordner, Richard M. and Carol Silva

Briggs, L. Vernon
1926  Experiences of a Medical Student in Honolulu, and on the Island of O'ahu 1881. David D. Nickerson Company, Boston.

Clark, Stephan D.

Condé, Jesse C. and Gerald M. Best

Dagher, Cathleen A. and Robert L. Spear

Donn, John M.
1906  Hawaii Territory map of Oahu. Registered Map 2374. Hawaii Land Survey Division, Department of Accounting and General Services, Honolulu.

Foote, Donald E., Elmer L. Hill, Sakuichi Nakamura, and Floyd Stephens

Fornander, Abraham
Frierson, Barbara


Google Earth

Hammatt, Hallett H. and David W. Shideler
1990 Archaeological Inventory Survey of the West Loch Bluffs Project Site, Honolulu, ‘Ewa, O‘ahu. Cultural Surveys Hawai‘i, Kailua, Hawai‘i.

Haun, Alan E.
1986 Preliminary Archaeological Reconnaissance Survey for Environmental Assessment (EA) Ewa Town Center/Secondary Urban Center Land of Honolulu, Ewa, Island of Oahu, (TMK 9-1-15: Por. 4, 5, 17; 9-1-16:1, Por. 4, 6, 9, 16, 18, 24, 30; 9-2-19: por. 1), PHRI report # 275-111886. Paul H. Rosendahl, Ph.D., Inc., Hilo, Hawai‘i.

Haun, Alan E. and Marion Kelly

Hawai‘i TMK Service

‘I‘i, John P.

Indices of Awards
1929 Indices of Awards Made by the Board of Commissioners to Quiet Land Titles in the Hawaiian Islands. Commissioner of Public Lands. Star Bulletin Press, Honolulu.

Kennedy, Joseph

LRFI for the Kapolei Parkway Project, Honolulu, ‘Ewa, O‘ahu

TMK: [1] 9-1-160-189p, Lots 6 and 7, and Manawai St and Wakea St extensions
Landrum, Jim and Allan J. Schilz

Malden, Lieutenant Charles R.
1825 South Coast of Oahu. Registered Map 640. Hawai‘i Land Survey Division, Department of Accounting and General Services, Honolulu.

McAllister, J.G.

McIntosh, James and Paul L. Cleghorn

Native Register
1847 Native Register of Kuleana Claims to Quiet Land Titles in the Hawaii Islands. Hawai‘i State Archives, Honolulu.

O’Hare, Constance R., Todd Tulchin, David W. Shideler, and Hallett H. Hammatt

O’Leary, Owen and Hallett H. Hammatt
2005 Archaeological Literature Review and Field Inspection for the Fort Barrette Road Widening Project, Honouliuli Ahupuaa, Ewa District, Oahu Island. Cultural Surveys Hawai‘i, Inc., Kailua, Hawai‘i

Oshima, Neal

Ostroff, Brad, Michelle Elmore, and Joseph Kennedy

Payette, Pete
Rasmussen, Coral M. and Tomonari-Tuggle, M.J.
2006 Archaeological Monitoring of Waiau Fuel Pipeline, ‘Ewa District, Island of O’ahu TMK Zone 9 with Parcels in Sections 1, 3, 4, 6, 7, and 8. International Archaeological Research Institute, Inc., Honolulu.

Rosendahl, Paul H.

Sterling, Elspeth P. and Catherine C. Summers

Tuggle, H. David, and Myra J. Tomonari-Tuggle
1997 A Cultural Resource Inventory of Naval Air Station, Barbers Point, O‘ahu, Hawai‘i; Part I: Phase I Survey and Inventory Summary. International Archaeological Research Institute, Inc., Honolulu.

Tulchin, Jon and Hallett H. Hammatt

U.S. Army War Department
1919 U.S. Army War Department fire control map, Barbers Point and Nanakuli quadrangles. USGS Information Services, Denver, Colorado.
1936 U.S. Army War Department terrain map, Barbers Point and Waianae quadrangles. USGS Information Services, Denver, Colorado.
1943 U.S. Army War Department terrain map, Barbers Point, Ewa, and Waipahu quadrangles. USGS Information Services, Denver, Colorado.

USDA (U.S. Department of Agriculture)

USGS (U.S. Geological Survey)
1928 Barbers Point USGS 7.5-minute series topographic quadrangle. USGS Information Services, Denver, Colorado.
1929 Waianae USGS 7.5-minute series topographic quadrangle. USGS Information Services, Denver, Colorado.
1951 USGS serial photograph of Barbers Point (UH MAGIS, http://guides.library.manoa.hawaii.edu/magis)
1953 Ewa USGS 7.5-minute series topographic quadrangle. USGS Information Services, Denver, Colorado.
1962 USGS serial photograph of Barbers Point (UH MAGIS, http://guides.library.hawaii.edu/magis)

1968 USGS serial photograph of Barbers Point (UH MAGIS, http://guides.library.hawaii.edu/magis)

1968 Ewa USGS 7.5-minute series topographic quadrangle. USGS Information Services, Denver, Colorado.

1998 Ewa USGS 7.5-minute series topographic quadrangle. USGS Information Services, Denver, Colorado.

2011 USGS Orthoimagery aerial photograph. USGS Information Services, Denver, Colorado.

Waihona ‘Aina
