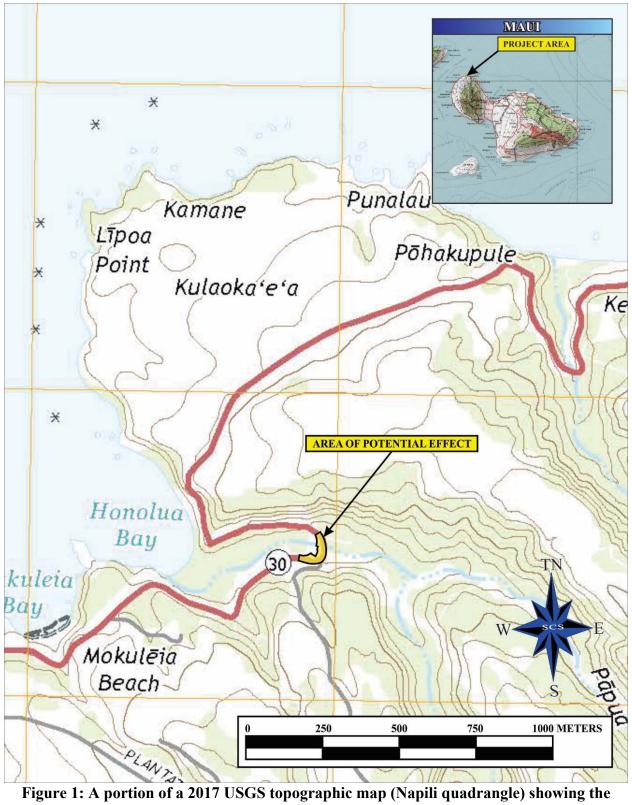
## **INTRODUCTION**

At the request of Austin, Tsutsumi & Associates, Inc., Scientific Consultant Services, Inc. (SCS) has prepared this Archaeological Monitoring Plan (AMP) for the proposed rehabilitation of a bridge over Honoapi'ilani Highway in Honolua. The project is proposed by the Hawai'i Department of Transportation (HDOT) and will receive funding from the Federal Highway Administration (FHWA). Therefore, the proposed action has been determined to be a federal undertaking as defined in Code of Federal Regulations (CFR), Title 36, Part 800.16(y), and is subject to Section 106 of the National Historic Preservation Act (NHPA) as well as Hawaii Revised Statutes (HRS) § 6E-8 and Hawaii Administrative Rules (HAR) § 13-275.

The proposed project would upgrade the existing Honolua Stream Bridge as a single lane facility with a superstructure on the existing abutments, replace the guardrails, end treatment connections, and other deteriorated materials with new ones matching the existing structures, and install new signage and pedestrian, bike, and shoulder lanes. The Section 106 area of potential effects (APE) is synonymous with the HRS) § 6E-8 project area, and is defined as the area that extends from the existing Honolua Bridge along Honoapi'ilani Highway, located approximately between mile post markers 32.40 and 32.51, plus construction parcels *makai* (oceanward) of the highway for staging areas [Tax Map Key (TMK) parcels: (2) 4-1-001: portion of 010, and (2) 4-2-004: portion of 032], totalling approximately 1.0 acre. The area of potential effects is shown on a portion of the 2017 U.S. Geological Survey topographic map, a TMK map, and a 2013 Google aerial map (Figures 1 through 3).

In 2009, SCS conducted an archaeological inventory survey (AIS) (Perzinski and Dega 2014) of the project's area of potential effects. The AIS report was accepted by the State Historic Preservation Division (SHPD) in a letter dated February 23, 2015 (Log No. 2014.03793, Doc No. 1502MD36). In a letter dated December 19, 2018 (Log No. 2018.02656, Doc No. 1812TGM04; see Appendix A), however, SHPD did not concur with the Federal Highway Administration's (FHWA) determination of "no adverse effect" for the proposed project. Subsequently, a meeting was held on May 7, 2019 (see Appendix B for minutes) to discuss the issue, during which it was determined that an AMP should be provided for the project. SHPD subsequently issued another letter, dated April 14, 2021 (Submission No. 2019PR31792.001 Log No. 2019.02531, Doc No. 2104SH08; see Appendix A), concurring with FHWA, but with stipulations (e.g. the AMP).

The current AMP is created in compliance with Hawai'i Administrative Rules (HAR) §13-279-4 and §13-275. Its purpose includes providing mitigation measures to protect the historical properties (identified by archaeological work) in the vicinity of the area of potential effects.



location of the area of potential effects

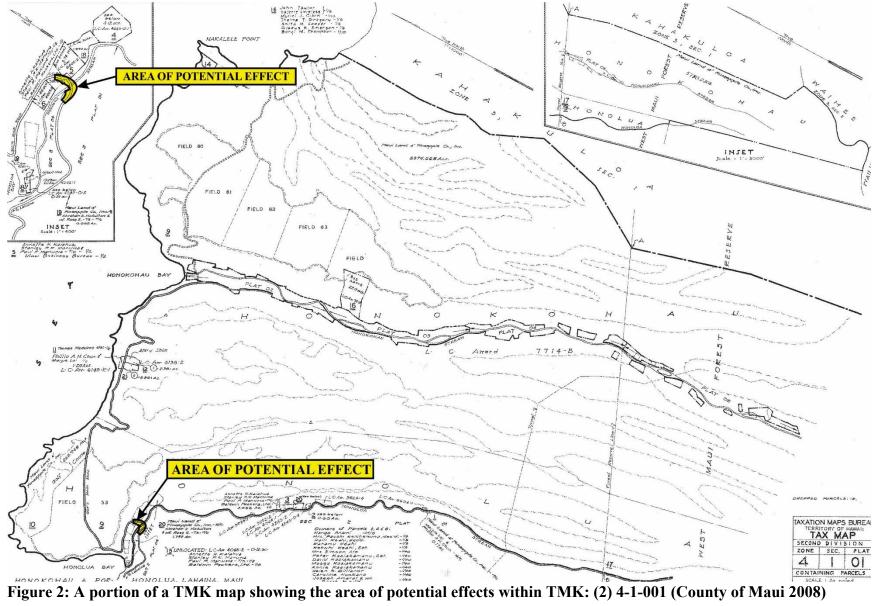




Figure 3: A 2013 Google Earth aerial photograph showing the location of the area of potential effects

These features include an agricultural terrace [part of State Inventory of Historic Places (SIHP) Site Number 50-50-10-01471], a historic basalt wall (SIHP Site No. 50-50-10-01754), and a water diverting wall (SIHP Site No. 50-50-10-06812). The AMP also has the purpose of accounting for the potential inadvertent discovery of significant cultural deposits. Archaeological monitoring "shall entail the archaeological observation of, and possibly intervention with, ongoing activities which may adversely affect historic properties" (§13-279-4, HAR). If human remains are encountered during subsurface work, they will be addressed in accordance with the lawful protocol concerning the Inadvertent Discovery of Human Remains (pursuant to §13-300-40a, b, c, HAR).

The following plan briefly outlines background research on the natural and historical setting and significance of the project area, as well as the recent previous archaeology in its vicinity. This AMP also details appropriate field and laboratory methods and conventions to be applied during monitoring and the proper reporting of any culturally and archaeologically significant features and artifacts.

# **ENVIRONMENTAL SETTING**

Maui is the second largest island of the Hawaiian Archipelago. It was formed by two volcanoes, the younger, dormant Haleakalā in the east, and the older and extinct Pu'u Kukui in the west, joined together by an isthmus of dry, open country. Haleakalā (which means "house of the sun") is the larger of the two volcanoes, soaring 3,055 m (10,023 ft) above mean sea level (amsl) and forming the larger, southeastern section of the island (East Maui). The smaller Pu'u Kukui ("candlenut peak"), rising to 1,764 m (5,788 ft) amsl, comprises the northwestern section (West Maui). The isthmus of Maui joining the two volcanoes was formed by erosional deposits from Haleakalā against the slopes of Pu'u Kukui.

#### **LOCATION**

The area of potential effects is centered on the bridge crossing Honolua stream and extends from the bridge in the following directions: 250 feet along Honoapi'ilani Highway in the northwest direction, 275 feet along Honoapi'ilani Highway in the southwest direction, 12 feet in the *mauka* (mountainwards) direction, and 120 feet in the *makai* direction. [TMK: (2) 4-1-001:010 por. and (2) 4-2-004:032 por.], for a total area of approximately 1.0 acre. It falls on the northern coast of West Maui along Honoapi'ilani Highway, which, along with Honolua bridge, is considered a right-of-way area. The surrounding lands are in conservation and are often referred to as "Honolua Forest" or "Honolua Park." The elevation of the area of potential effects ranges from approximately 20 to 40 ft (6 to 12 m) amsl.

The area of potential effects is located within the *ahupua'a* of Honolua in the modern district of Lāhainā (Hawaii State Office of Planning 2021). Lāhainā is one of the six districts dividing the County of Maui, comprising the western half of West Maui.

#### **CLIMATE**

The area of potential effects is located on the northern coast of West Maui, which places it on the windward side of the island. As it is on the coast, it does not benefit from increased precipitation from orographic lift like upland regions do. This suggests that the area of potential effects should expect moderate rainfall, less that upland regions, but more than leeward areas that fall within the rain shadow of the mountains. Mean annual rainfall over the area of potential effects is 1137 mm (44.8 in) (Giambelluca et al. 2014). Rainfall is heavier over the months of November through March, with mean monthly amounts peaking at 137 mm (5.4 in) in January. The weather is driest from June through September, with the lowest monthly average rainfall of 60 mm (2.4 in) in June (Giambelluca et al. 2014).

Average annual air temperature in the area of potential effects is 23.4 °C (74.1 °F). August is the hottest month with an average of 25.1 °C (77.3 °F), while February is the coolest with an average at 21.5 °C (70.6 °F) (Giambelluca et al. 2014).

#### **SOILS**

According to Foote et al. (1972: Sheet 91) and the National Cooperative Soil Survey (n.d.) (Figure 4), the area of potential effects is located on Stony Alluvial Land (rSM) and Rough Broken and Stony Land (rRS). The rSM soil series typically exhibits slopes between 3 to 15 percent, and is difficult to cultivate because of the stones and boulders (Foote et al. 1972:120). According to Foote et al., rRS "consists of very steep stony gulches" (Foote et al. 1972:119), making it even less inviting to agricultural activity. The area of potential effects contains thin soils over volcanic rocks in addition to stones, boulders, and sediment deposited by Honolua Stream along the bottom of the gulch.

#### VEGETATION

According to Juvik and Juvik (1998:122, 127) before human settlement, the native ecosystem of the area of potential effects was a "lowland dry and mesic forest, woodland, and shrubland." Indigenous flora persisting in this ecosystem includes 'a'ali'i (hopbush, Dodonaea viscosa), 'ākia (Wikstroemia sp.), ēlama (Diospyros hillebrandii), kāwelu (variable lovegrass Eragrostis variabilis) koa (Acacia koa), ko'oko'olau (Bidens sp.) 'ohi'a (Metrosideros macropus), pili (black speargrass, Heteropogon contortus), 'ūlei (Hawaiian hawthorn Osteomeles anthyllidifolia), and wiliwili (Erythrina sandwicensis).



Figure 4: Google Earth aerial photograph showing the soil series in the area of potential effects and in its vicinity (USDA-NCSS SSURGO and STATSGO Soil Survey Products)

The 2009 AIS of the area of potential effects conducted by Perzinski and Dega (2014) noted *noni* (Indian mulberry, *Morinda citridolia*) and *kukui* (candlenut, *Aleurites moluccana*), both medicinal plants, as well as introduced species such as African tulip trees (*Spathodea campanulata*), castor bean (*Ricinus communis*), Java plum (*Syzygium cumini*), *koa haole* (white leadtree, *Leucaena latisiliqua*), and monkeypod (*Pithecellobium saman*).

# **HISTORICAL SETTING**

Archaeological data indicate that the initial settlement of the Hawaiian Islands by Polynesians occurred on the windward shores around the 10<sup>th</sup> century C.E., with populations extending into leeward areas in later periods (Kirch 2011:22). It is likely that settled human presence in the project area can be traced to the early period of agricultural development, which on Maui began approximately 1200-1400 C.E. (Kirch 1985:142).

#### TRADITIONAL POLITICAL BOUNDARIES

Tradition has it that Maui was divided into *moku* (districts) and *ahupua'a* (subdistricts) by a *kahuna* (priest) named Kalaiha'ōhia during the time of the *ali'i* (chief) Kaka'alaneo (Beckwith 1970:383). Abraham Fornander places Kaka'alaneo at the end of the 15<sup>th</sup> or the beginning of the 16<sup>th</sup> century (Fornander 1919-20, Vol. 6:248). The *ahupua'a* were meant to incorporate all of the natural resources relevant to subsistence and stretched from the ocean to the mountain peaks, providing access to ecosystems at various elevations (Lyons 1875). These land divisions are so called because their boundaries were marked by a heap (*ahu*) of stones surrounded by an image of a pig (*pua'a*), or because a pig or other tribute was laid on the altar as tax to the chief (Native Hawaiian Library n.d.). These ancient divisions are still in common use to locate and refer to geographical features of the islands, despite the intervening changes in land tenure (Sterling 1998:3). The *'ili* were smaller land divisions administered by the chief who controlled the corresponding *ahupua'a* (Lucas 1995:40). According to Lucas (1995:61) the land holding of a *hoa 'āina* (tenant) was called a *kuleana* (right, privilege), a term that eventually came to mean "property" or "title," as well.

According to the Hawaii State Office of Planning (2021), the area of potential effects falls within Honolua Ahupua'a, which in turn was part of the traditional Kā'anapali Moku. Honolua translates literally as "two harbors," and Kā'anapali as "cliffs of division" (Native Hawaiian Library n.d.).

#### PRE-CONTACT ECONOMY AND LEGENDARY PLACES

Pre-Contact Hawaiian economy was based on agricultural production, marine exploitation, and raising livestock, in addition to collecting wild plants and birds. Patrick Kirch notes that Pre-Contact Hawaiian economy was productive and diverse enough to support "considerable craft specialization" including "canoe-makers, adz-makers, bird-catchers, wood-carvers and tattooing experts" (1985:3). Such a description suggests a sophisticated society with a bounty of both surplus food and spare labor to support considerable non-subsistence activities.

Settlements were often concentrated in river valleys most amenable to wet kalo (taro,  $Colocasia\ esculenta$ ) cultivation, which incorporated  $lo\ 'i$  (pond fields) and irrigation canals. Areas with higher precipitation permitted cultivation of  $k\bar{o}$  (sugar cane,  $Saccharum\ officinarum$ ) and  $mai\ 'a$  (banana,  $Musa\ spp.$ ). Dryland agriculture centering on 'uala (sweet potato,  $Ipomoea\ batatas$ ) as the staple crop was also prevalent, especially on the leeward sides of the islands.

Edward S. Craighill Handy and Elizabeth G. Handy (1972) note that the valleys in southwestern Kāʻanapali (including Honolua Ahupuaʻa) were used for agriculture before Contact:

North of Lahaina are five valleys watered by streams draining the western slopes of the West Maui watershed: Honokawai, Kahana, Honokahua, Honolua, and Honokohau. The first fuur all had extensive *lo 'i* lands in their valley bottoms, where terraces rose tier on tier in symmetrical stone-faced *lo 'i*. On this part of the coast there is no sloping *kula* land seaward of the valleys as there is back of Lahaina and southeastward. [Handy and Handy 1972:494]

Research by Patrick Kirch (1985) suggests the primacy of marine foraging and fishing in coastal Honolua, with permanent habitation occurring in the neighboring valleys:

On West Maui, in the Honolua area, excavations... at Hawea Point provided evidence for intermittent marine exploitation. The coastal midden deposit at Hawea Point was noteworthy for its high density of burned candlenut shells, and several large earth ovens were exposed. The fishermen who repeatedly used this site probably brought the kukui nuts from their permanent residence sites in one of the nearby valleys, roasted them at the Hawea camp, and prepared the 'inamona concoction (which combines fish, seaweed, and kukuinut kernels) to be taken back to home sites for consumption [Kirch 1985:136]

The lack of intervening lowland *kula* (dry land; term used to specify land suitable for dryland agriculture as opposed to wet) meant that unlike further south, *lo'i* would be located quite close to the coast and marine resources there.

According to pioneering archaeologist Thomas Thrum (1909:440), a legendary *ali'i* called Hua, who reigned prior to the 10<sup>th</sup> century, is credited with the construction of the first *heiau* (Hawaiian religion temples) on Maui in Lāhainā Moku, to the south of Kā'anapali Moku. Winslow Walker's early archaeological surveys recorded seven *heiau* (Sites 12-19) in Kā'anapali from Māhinahina to Honokōhau Ahupua'a solely on the basis of oral testimony (Walker 1931). The *heiau* closest to the area of potential effects was Honua'ula Heiau (Walker Site 18), which along with the destroyed Puhalakau ('Ai Mai'a) Heiau (Walker Site 17), was in Honolua Ahupua'a (Walker 1931:120-121). Kā'anapali Moku also includes the *Nā Hono a Pi'ilani*, ("the bays of Pi'ilani"): six bays with names starting with "*hono*" (bay) associated with the chief Pi'ilani, and according to legend, with a prophetic vision predicting the ascension of his younger son Kiha over the elder Lono (Clark 1989:64, Sterling 1998:6).

#### PRE-CONTACT POLITICAL HISTORY

Although certainly settled by the 10<sup>th</sup> century, Maui's division into political blocs came with population growth and an increase in social stratification and complexity. Michael Kolb et al. (1997:14-15) refer to 1200-1400 C.E. as a formation period, noting that the archeological record shows building of temples, an indicator of sizeable populations and complex organization. By the 1400s C.E., Maui had largely been consolidated into two kingdoms – one centered in Hāna on the windward coast of East Maui, and one ruled at different times from Wailuku on the eastern shore of West Maui, or from Lāhainā on the western shore. Fornander (1880, Vol. 2:78–79) claims that the *ali'i* of East Maui traced their origins to Kalahuimoku, a Hawai'i Island chief who had emigrated to Hāna, while those in West Maui originate from an older Maui line.

Wailuku chief Pi'ilani is credited not only with unifying Maui, but also with increasing its status (Fornander 1880, Vol. 2:87). Pi'ilani was succeeded by his firstborn son Lono-a-pi'ilani. Nineteenth century historian Samuel Kamakau (1961:22-24) relates oral traditions of how Lono's younger brother Kiha-a-pi'ilani (born c. 1626) would eventually overthrow him. After quarreling between the brothers escalated to violence, Kiha fled. He hid for a time in the uplands of Maui before eventually traveling to Hawai'i Island, which was then ruled by his brother-in-law Umi, in order to convince Umi to send an army to Maui to avenge him and dethrone Lono. The invasion was known in the oral tradition as the "sailing of the numberless canoes" since the canoes were said to stretch across the Maui channel from Kohala on Hawai'i Island, allowing Umi's army to march across them as if on a bridge (Fornander 1918-19, Vol. 5:178–180). According to Kamakau (1961:28–30), while this invasion represented a massive logistical effort involving a "whole year of the making of canoes and war implements," multiple landing attempts failed before a successful invasion occurred at Wailua-iki.

With his brother overthrown, Kiha became Maui's sole ruler and oversaw the completion of a stone-lined path begun by his father, the *ala loa* ("main road"), or King's Trail, which circled the entire island (Beckwith 1970:387). The oral accounts of Kiha-a-pi'ilani and Umi demonstrate consolidation of political power, as chiefs were able to not only unify the islands, but also take on massive logistical efforts and project military might interisland. It also marks a trend toward wars of succession that would continue in the following generations (Speakman, 1978:9-13).

#### **EARLY POST-CONTACT HISTORY**

The Post-Contact Period on Maui began on November 26, 1778, with British Explorer Captain James Cook's passing by the island on his way back from the extreme Northern Pacific (Daws 1974:8). Cook's visit occurred during a war between Hawai'i chief Kalani'ōpu'u and Maui chief Kahekili II (a descendant of Pi'ilani), the latest in a series of conflicts between the islands (Speakman 1978:26).

Maui would reach the height of its political influence under Kahekili II (c. 1737-1794) who was able to bring Oʻahu, Lanaʻi, and Molokai under his rule in addition to his native Maui. After his death at Waikīkī in 1794, however, Kahekili's large but unstable realm succumbed to fratricidal conflicts (Kolb et al., 1997:3). It would be Hawai'i chief Kamehameha I (c. 1737-1794) who would fulfill the ambition of unifying the islands. In February of 1795, Kamehameha established his presence on Maui with the invasion of Lāhainā, his large fleet of war canoes covering the coast from Launiupoko to Mala (Kamakau 1961). In the following years, the descendants of Piʻilani and the chiefly Maui families were for the most part dispossessed of their lands unless they surrendered to Kamehameha's conquest (Fornander 1919-20, Vol. 6:310). In 1810, Kamehameha I completed the unification of the islands when Kaua'i chief Kaumuali'i agreed to become his subordinate.

Kamehameha I had won his wars with the aid of gunpower weapons gained by trade with passing American and European ships, and his successors would open the Hawaiian kingdom to greater Western influence. Hawai'i's previous subsistence economy changed under market forces over the first half of the 19<sup>th</sup> century. The buying and selling of produce to provision sailing ships, at the time mostly passing by on trade routes between North America and Asia, was strictly regulated under Kamehameha I, who held trade as a royal monopoly (Daws 1968:44). His successors, however, gave into the pressure from the lesser chiefs who wanted a share of the bounty, especially exotic merchandise brought in by foreign merchants. During the reign of Liholiho (Kamehameha III, r. 1825–1854), chiefs imported foreign goods on credit, promising payment in sandalwood cut from the mountains. This practice caused famine as workers levied for this task were taken away from subsistence agriculture and exhausted the supply of sandalwood trees within a few decades (Rhodes and Greene 1993).

By the time of Kauikeaouli (Kamehameha III, r. 1825–1854), free enterprise dominated commerce, and suppling the booming whaling industry had become the main non-subsistence economic activity. Much of the commerce was routed through areas more amenable to anchoring ships on the western coast of Maui, especially Lāhainā to the southwest. Increasing commerce also introduced new hazards, spreading diseases to which Hawaiians lacked resistance. Missionaries in Kā'anapali Moku conducted the first census of the area in 1831, recording 2,980 persons in the district, a number that was reduced to less than half that (1,341) just five years later (Schmitt 1973).

### THE MĀHELE

In the 1840s, during the reign of Kauikeaouli, massive change in land tenure occurred. The transition from traditional Hawaiian communal land use to private land ownership based on Western legal practices is commonly referred to as the "Māhele" (division) or sometimes "the Great Māhele" because the land was legally divided between owners (Daws 1974:128).

Formalizing land ownership had long been suggested by Western advisors to the king and chiefs, but the five-month occupation of the islands by British naval officer George Paulet in 1843 may have provided impetus to seriously considering the issue. It was thought that privatization offered the *ali'i* hope that they might retain control over their lands as property even if national sovereignty were lost (Daws 1974: 112-117). The Board of Commissioners to Quiet Land Titles (often shortened to "the Land Commission") was established in 1945 to oversee land titles.

The Māhele of 1848 divided Hawaiian lands between the ownership of the king, the chiefs, and the *aupuni* (government). The parcels awarded by the Land Commission were called Land Commission Awards (LCAs). Once lands were made available, *maka 'āinana* (commoners) were also able to claim the plots on which they had been living and cultivating through the Kuleana Act of 1850. In order to file claims, however, the *maka 'āinana* first had to be aware of the awarding of *kuleana* lands and LCAs, procedures that were largely foreign to them. People claiming house lots in Honolulu, Hilo, and Lāhainā were in addition required to pay commutation to the government before obtaining a Royal Patent on their awards (Chinen 1961:16). Rural *kuleana* claims still required a survey, which could be quite costly, assuming the services of one of the few surveyors at the time could be obtained (Moffat and Fitzpatrick 1995:50). Furthermore, agricultural awards often did not include fallow land, stream fisheries, or many other resources necessary for survival (Kame'eleihiwa 1992:295). These factors may have contributed to the relatively low number and size of claims, as only 8421 *kuleana* awards were issued, totalling only an estimated 28,658 acres (Moffat and Fitzpatrick 1995:50).

While the claims system awarded them little, records show that the *maka* 'āinana were able to purchase an estimated 167,290 acres of land between 1850 and 1893 (Beamer and Tong 2016). Foreigners were also allowed to acquire land through the Alien Land Ownership Act of 1850, and by 1900 "white men owned four acres of land for every one owned by a native" (Daws 1975:125).

#### LAND COMMISSION AWARDS

According to Kipuka Online Database (2016) and Waihona 'Āina (2000-21), Honolua Ahupua'a, less *kuleana* parcels, was awarded to William Charles Lunalilo in 1902 with LCA No. 8559 B:23 and Royal Patent no. 8129. As this date falls after the annexation of Hawai'i in 1898, the LCA documents are signed by the authority of territorial governor Sanford B. Dole, and presumably conveyed any property interests to Lunalilo's heirs. There were a total of 37 LCAs in Honolua Ahupua'a, including several *kuleana* parcels along Honolua stream near the bridge.

Just northwest of the bridge is 'āpana (land parcel, lot) 3 of LCA No. 3802 claimed by Lohelohe in 1858 in accordance with Royal Patent Grant No. 4198 for use as *kula* (field; agricultural dryland) and *pahele* (court yard). Just to the northeast is 'āpana 2 of LCA No. 6602, claimed as *kula* land in 1856 by Peleua in accordance with Royal Patent Grant No. 3338 (lot corresponding to TMK: (2) 4-1-001:005). Not far to the south of the bridge is LCA No 4243 C, claimed as *kula* land in 1859 by Kauwewahine in accordance with Royal Patent Grant No. 4765. These constitute the LCAs potentially overlapping with the area of potential effects.

There are additional *kuleana* parcels in Honolua Valley. Bordering Lohelohe's parcel on the east is 'āpana 3 of LCA No. 4065, claimed as *kula* land by Kahiki in 1856 in accordance with Royal Patent Grant No. 3330 (corresponding to TMK: 4-1-001:006). Bordering Kauwewahine's parcel on the east is 'āpana 3 of LCA No. 4256, claimed as *kula* land by Kenao in 1858 in accordance with Royal Patent Grant No. 4189. Bordering Peleua's parcel on the east is 'āpana 1 of LCA No. 3691, claimed as *kula* land by Manuwa in 1858 in accordance with Royal Patent Grant No. 4174 (corresponding to TMK: (2) 4-1-001:018). Further east, on the eastern border of Manuwa's parcel is 'āpana 1 of LCA No. 4243 D, claimed as *kula* land by Makaole in 1858 in accordance with Royal Patent Grant No. 4188 (corresponding to TMK: (2) 4-1-001:004).

Additionally, there are a few small lots near the coast of Honolua Bay: 'āpana 1 of LCA No. 4243, claimed in 1869 by Keli'ipoina in accordance with Royal Patent Grant No. 6246 for pahale (corresponding to TMK: (2) 4-1-001:019), 'āpana 1 of LCA No. 4246, claimed in 1860 by Kaleo in accordance with Royal Patent Grant No. 4785 for pahale (corresponding to TMK: (2) 4-1-001:007], and 'āpana 2 of LCA No. 4243 D, claimed by Makaole in 1858 in accordance with Royal Patent Grant No. 4188 for pahale (corresponding to TMK: (2) 4-1-001:008).

## MID 19<sup>TH</sup> CENTURY TO PRESENT

Whaling declined in the late 19<sup>th</sup> century, and sugar cane cultivation and ranching came to the forefront of Hawaiian economy in part because the Māhele allowed the consolidation of now privately owned lands into vast plantations and ranches. The largest and most successful in Lāhainā District became the established in 1859 Pioneer Mill Company, which owned 900 acres and was able to produce 2000 tons of sugar in 1884. While some commercial agriculture was conducted on the northern shores of West Maui, the land was not well suited for sugar cane, which was the most valuable cash crop until well into the next century thanks to the Reciprocity Treaty of 1875 permitting duty-free trade of sugar between the Kingdom of Hawai'i and the United States (Kuykendall 1967:46-48).

James Campbell established Honolua Ranch in the late 19th century, around the time when cattle ranching came into wider practice in Maui. Under later owner Henry Perrine Baldwin and his descendants, the Ranch was successful and expanding to encompass the ahupua 'a of Honolua, Honokōwai, Honokōhau, Kahana, Māhinahina, and Mailepai (Ashdown 1972). The manager of the venture after 1892 was Richard Cooper Searle, Sr., during whose time weekly interisland steamers stopped at Honolua Bay to pick up cattle hides and coffee produced by the ranch (Clark 1989:67). Baldwin died in 1911, but operations did not cease. Searle was succeeded by horticulturalist David Thomas Fleming, who had experience in growing pineapple from past work in Ha'ikū. Fleming became manager of Honolua Ranch in 1912 and shifted operations to focus on commercial pineapple production (Clark 1989:67). A pineapple cannery was constructed in Honolua in 1914, but moved to Honokahua in 1915. In 1920, the operation changed its name to "Baldwin Packers," reflecting that it not only grew but processed and canned pineapple. The plantation communities of Honokahua and Nāpili emerged and developed as operations grew, and the population of Lāhainā District rose to supply workers and services for the booming industry, especially after canning was moved to the larger Lāhainā cannery close to the waterfront (Maui Land and Pineapple Company, Inc. n.d.).

By the 1950s and 60s, commercial agriculture was declining in favor of tourism. In 1962, Baldwin Packers merged with Maui Land and Pineapple Company, also owned by the Baldwin family, and soon began planning for resort development on previously agricultural lands. Hotels such as the Ritz-Carlton Kapalua and luxury residential developments such as Coconut Grove now occupy the place of the former pineapple fields of West Maui. Today, the primary business of Maui Land and Pineapple Company is real estate and tourism, although the company also maintains nearly 9,000 acres of conservation land. Honolua Bay was the location from which the famous Hōkūle'a ("happy star") canoe launched its trip to Tahiti in 1976 (Clark 1989:68).

## **PREVIOUS ARCHAEOLOGY**

The earliest archaeological endeavors on Maui in general were undertaken by Thomas Thrum (1909), John F.G. Stokes (1909–16), and Winslow Walker (1931) with the sponsorship of the Bishop Museum. These studies identified a number of *heiau* and other religious features. Most of the archaeological research in the vicinity of the area of potential effects is more recent, occurring after the implementation of SHPD requirements for protection of significant cultural and archaeological properties in the late 1980s. Archaeological work in the vicinity of the area of potential effects is shown on Figure 5 and described below.

In 1974, an archaeological survey of Honolua Valley was conducted by Kenneth Moore (1974) under the auspices of the Bernice Pauahi Bishop Museum's Department of Anthropology. Approximately 90 acres of land owned by the Maui Land and Pineapple Company, Ltd. were subject to a pedestrian survey, and 13 archeological sites were recorded. According to Moore (1974), the destroyed Puhalakau Heiau (Walker Site 17; Bishop Site 50-Ma-D14-002) was located in a portion of the parking area at Honolua Beach. The survey also recorded Honua'ula Heiau (Walker Site 18; Bishop Site 50-Ma-D14-005) on the *mauka* (mountainward) side of Honoapi'ilani Highway. These heiau were later assigned as SIHP Site Numbers 50-50-01-00017 and 50-50-01-01471, respectively. Other identified sites were SIHP Site No. 50-50-01-01751 (basalt bounders used as grinding surfaces, likely used to sharpen adzes), SIHP Site No. 50-50-01-01752 (Post-Contact concrete house foundations and three graves associated with LCA 4243 D, 'āpana 2), SIHP Site No. 50-50-01-01753 (possible midden from a temporary fishing camp), SIHP Site No. 50-50-01-01754 (mostly Post-Contact rock walls and a stone and cement foundation for a footbridge, remnants of the Honolua Ranch complex), SIHP Site No. 50-50-01-01755 (mix of Preand Post- Contact habitation and burial features), SIHP Site No. 50-50-01-01756 (agricultural complex approximately 140 m mauka of Honoapi'ilani Bridge), SIHP Site No. 50-50-01-01757 (Post-Contact walled enclosure likely damaged during the construction of Honoapi'ilani Highway), 50-50-01-01758 (Post-Contact house and possible Pre-Contact burial mounds in close proximity to Honua'ula Heiau), SIHP Site No. 50-50-01-01759 (isolated wall segment running from Honolua Stream to the edge of Honoapi'ilani Highway), SIHP Site No. 50-50-01-01760 (skeletal remains partially exposed in road cut along Honoapi'ilani Highway opposite the isolated wall segment), and SIHP Site No. 50-50-01-01761 (shell midden on the south bank of Honolua Stream). Moore recommended preservation for the *heiau* (Site -01471), burials (features of Sites -01752 and -01471; see Tome et al. 2002 below), and the grinding stones (Site -01751 and one feature of Site -01754) (Moore 1974).

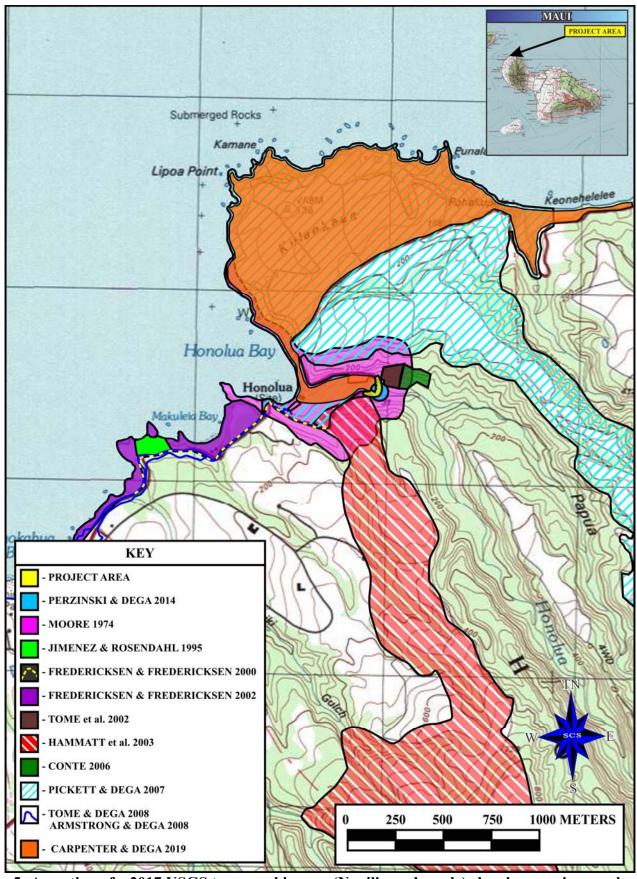


Figure 5: A portion of a 2017 USGS topographic map (Napili quadrangle) showing previous archaeology in the vicinity of the area of potential effects

In 1995, Paul H. Rosendahl, Inc. conducted an AIS (Jimenez and Rosendahl 1995) of approximately 2.47 acres in TMK: (2) 4-2-004:031 (the Honolua Coastal Parcel). Five sites (SIHP Site Numbers 50-50-01-04141 through 50-50-01-04145) comprised of six features were identified. SIHP Site No 50-50-01-04141 consisted of a subsurface fire feature (charcoal and ash concentration) that was assessed as having a cooking function. SIHP Site No 50-50-01-04142 is a complex of four small terraces with glass jars that may have served as receptacles for flowers and was assessed as a burial site. SIHP Site No 50-50-01-04143 was a rectangular platform lined with basalt cobbles and was assessed as a permanent habitation site. SIHP Site No 50-50-01-04144 was a modified outcrop and a rock alignment, both with surface midden, interpreted as a possible habitation location. SIHP Site No 50-50-01-04145 was a rock wall and was likely the property boundary between the project parcel and the Maui Land and Pineapple Company. Sites -04144 and -04145 were assessed as no longer significant after the completion of the survey, Site -04141 was recommended for data recovery, Site -04142 was recommended for preservation, and Site -04143 was recommended for either preservation or data recovery (Jimenez and Rosendahl 1995).

In 1999-2000, Xamanek Researches, Inc (XRI) conducted an AIS (Fredericksen and Fredericksen 2000) along a 1.7 km corridor from 'Ālaelae Point to Honolua Bay for the then proposed Honoapi'ilani Highway improvement project. Four curves in the highway were covered by pedestrian surveys, and test excavations were conducted at one of them. One historic property was identified: SIHP Site No. 50-50-01-04829 consists of two dry-laid rock retaining wall sections supporting the highway across an unnamed drainage area near Makuleia Bay. The wall sections provided an example of 1940s dry-laid masonry work, and were assessed as significant under criteria "c" and "d" of the state historic preservation guidelines. Fredericksen and Fredericksen (2000) recommended that Site -04829 be incorporated into the proposed improvements.

In 2001, XRI conducted an AIS (Fredericksen and Fredericksen 2002) of an approximately 23-acre coastal property [then TMK: (2) 4-2-004:032, now TMK: (2) 4-2-004:032, 063, and 064] along the shores of Makuleia Bay and a part of Honolua Bay. A total of eight sites were documented: six newly identified ones (SIHP Site Numbers 50-50-01-05093 through 50-50-01-05098) and two (SIHP Site Numbers 50-50-01-05006 and 50-50-01-05009) initially identified by Fredericksen (2000). SIHP Site No 50-50-01-05006 is a Plantation Era refuse dump. SIHP Site No 50-50-01-05007 is an enclosure. SIHP Site No 50-50-01-05093 consists of a paved platform/enclosure with an associated access trail and a fish spotting station. SIHP Site No 50-50-01-05094 consists of possible habitation remnants. SIHP Site No 50-50-01-05095 is a remnant of the Old Government Road. SIHP Site No 50-50-01-05096 was a concrete slab associated with the former slaughterhouse. SIHP Site No 50-50-01-05097 consists of two rock overhang shelters. SIHP Site No 50-50-01-05098 is an *in situ* Native Hawaiian burial.

Fredericksen and Fredericksen (2002) reassessed Sites -05006 and -05096 as no longer significant after inventory, and Site -05094 was recommended for either preservation, or data recovery if alteration by previous earth moving made preservation infeasible. The other sites were recommended for preservation (Fredericksen and Fredericksen 2002).

In 2002, SCS conducted an AIS (Tome et al. 2002) of a 2.62-acre property [TMK: (2) 4-1-001:005] in Honolua, partially overlapping with the northeastern portion of the area of potential effects. Full pedestrian survey and the excavation of seven test units did not result in identification of any new sites. Tome et al. (2002) re-identified two sites (SIHP Site Numbers 50-50-01-01471 and 50-50-01-01758) initially identified by Walker (1931) and re-documented by Moore (1974). Site -01471 consists of Honua'ula Heiau and eight other features in proximity to it, including a terrace, walls, and three possible burial mounds. Moore had previously associated these mounds with the house site, but they were grouped with the heiau when SIHP site designations were assigned. One of the terraces yielded radiocarbon dates of 1480–1680 at two standard deviations of certainty. Site -01758 consisted of the remnants (corrugated metal roofing, decomposing lumber, and iron piping) of a Post-Contact house and two nearby basalt rock alignment features which Moore (1974) associated with it on the basis of proximity. Site -01758 was reassessed as no longer significant upon the completion of the survey, but the heiau and the possible burials features of Site -01471 were recommended for preservation (Tome et al. 2002).

Cultural Surveys Hawaii, Inc. (CSH) conducted an AIS (Hammatt et al 2003) of approximately 400 acres for the proposed Honolua Ridge Agricultural Subdivision Project [TMK (2) 4-2-001:001 por.]. Four new archaeological sites were identified and designated as SIHP Site Numbers 50-50-01-05234 (early 20<sup>th</sup> century water exploration tunnel), 50-50-01-05235 (Pre-Contact petroglyph), 50-50-01-05425 (Post-Contact trail), and 50-50-01-05426 (Pre-Contact permanent habitation site). Excavation was conducted at Site -05426 and at a rock outcrop near a *kuleana* parcel (LCA 3803:1). At the former location, a crypt-like feature was recorded within a boulder terrace, while the latter site yielded negative results for cultural materials and was not assigned a site number. Documentation of oral history was recommended for Site -05425, while the other sites were recommended for preservation (Hammatt et al 2003).

In 2005-06, CRM Solutions Hawai'i Inc. conducted an AIS (Conte 2007) of a 1.95-acre parcel [TMK: (2) 4-1-01:018] referred to as "the Stoops Property," located just east of the parcel surveyed by Tome et al. (2002). Full pedestrian survey and manual excavation of three test units re-identified a portion of one of the archaeological sites identified by Moore (1974). The site (Bishop Site 50-Ma-D14-011), which extended beyond the boundaries of the project area, had been assigned SIHP Site Number 50-50-01-01756.

Conte (2007) documented features corresponding to 12 of the features Moore (1974) identified as a part of the site, including L-shaped wall segments, terraces, a disturbed pile of cobbles and boulders, and a boulder alignment. The property owner decided to preserve all intact features of Site -01756 within the parcel (Conte 2007).

In 2005-06, SCS conducted an AIS (Pickett and Dega 2007) of an approximately 583-acre area encompassing Līpoa Point and Honolua Bay [TMK: (2) 4-1-001:010, (2) 4-2-004:032, and a portion of (2) 4-1-010:009]. This included survey fieldwork in 2005 and redocumentation of sites previously identified by Moore (1974) in 2006. The survey identified 23 sites (assigned SIHP Site Numbers 50-50-01-05913 through 50-50-01-05935) consisting of 43 features. Seventeen sites were of Pre-Contact age and associated with permanent or temporary habitation, ceremonial activities, agriculture, and transportation. Pre-Contact permanent habitation features included enclosures, terraces, and a platform. Temporary habitation loci were represented by L-shapes, Cshapes, an overhang or cave, and terraces. Agricultural terrace complexes consisted of terraces and modified outcrops. Features interpreted as ceremonial included a coral concentration, a waterworn cobble and pebble concentration, and an etched upright stone. Additionally, there was a trail for transportation to the occupation and activity areas. Nine sites were interpreted as Post-Contact, including the Fleming Clubhouse. Two sites were subject to radiocarbon dating. SIHP Site No. 50-50-01-05921 yielded a modern (likely contaminated) date from a subsurface feature, while SIHP Site No. 50-50-01-05932 yielded a Layer I cultural stratum date of 1660-1960 C.E., most likely from the Late Pre-Contact period. All sites were recommended for data recovery and/or preservation (Pickett and Dega 2007).

In 2007, SCS conducted an AIS (Tome and Dega 2008) for the then proposed Kapalua Coastal Trail. The 3.5-mile (5.6-km) long trail would pass through the *ahupua* 'a of Nāpili 2 and 3, Honokahua, and Honolua from Nāpili Bay to Honolua Bay. Four previously identified sites were re-documented, none of which were located in Honolua Ahupua 'a. SIHP Site Numbers 50-50-01-01342 (burial complex), 50-50-01-01346 (temporary habitation), and 50-50-01-01347 (temporary habitation) in Honokahua Ahupua 'a, and 50-50-01-05565 (temporary habitation) in Nāpili 2-3 Ahupua 'a were recommended for preservation (Tome and Dega 2008).

Subsequently, in 2008, SCS conducted archaeological monitoring (Armstrong and Dega 2008) of the construction of the Kapalua Coastal Trail. No historic properties or cultural materials were newly identified during monitoring. Previously recorded sites within the trail corridor were located in Honokahua or Nāpili 2-3 Ahupua'a, well west-southwest of the current area of potential effects (Armstrong and Dega 2008).

In 2009, SCS conducted the initial AIS (Perzinski and Dega 2014) of the area of potential effects [TMK: (2) 4-1-001:005 por., 009 por., & 010 por.] for the proposed bridge replacement. A pedestrian survey of a 150 ft (46 m) radius around the center-point of the bridge re-recorded two features (Feature 12 of SIHP Site No. 50-50-01-01471, and Feature 6 of SIHP Site No. 50-50-01-01754) previously documented by Moore (1974), and identified two additional historic properties. The 1924 bridge crossing Honolua Stream was added to Site -01754 as Feature 11, and a water diversion wall along the north bank of Honolua Stream approximately 50 m west of the bridge was designated as SIHP Site No. 50-50-01-06812. SCS recommended no further work on the archeological sites and monitoring for bridge or highway improvements in the area that would involve significant ground disturbance (Perzinski and Dega 2014).

In 2018, SCS conducted an addendum AIS (Carpenter and Dega 2019, in review) of approximately 244.12 acres at Līpoa Point, including lands in both Honolua and Honokōhau Ahupua'a. Full pedestrian survey re-documented all 23 sites identified in the prior AIS (Pickett and Dega 2007) and three sites (SIHP Site Numbers 50-50-01-08533, 50-50-01-08538, and 50-50-01-08540) previously identified by a field inspection (Dega 2008) in Honokōhau Ahupua'a, as well as identifying nine new sites (SIHP Site Numbers 50-50-01-08532 through 50-50-01-08540). Three of the newly identified sites were interpreted as traditional Pre-Contact agricultural terraces, one as a Pre-Contact temporary habitation site, two as Post-Contact burials, one as a Post-Contact ranching wall, one as a Post-Contact agricultural terrace, and one as agricultural terrace of undetermined temporal affiliation. Carpenter and Dega (2019) recommended that a burial treatment plan be prepared for SIHP Site Numbers 50-50-01-08533 and 50-50-01-08535, but no further work for the other sites. Archeological monitoring was recommended for any future ground altering activities in the area (Carpenter and Dega 2019, in review).

# **REASONS FOR MONITORING**

The previous studies summarized in this report show a pattern of considerable Pre- and Early Post-Contact activity along the shores and streams of northern West Maui. The area of potential effects is located close to a number of LCA parcels along Honolua stream, with such parcels occurring both up and downstream from the area of potential effects. These LCAs confirm that historic agricultural activity occurred in the vicinity. Since the project area has already been surveyed, encountering previously undocumented surface features is unlikely, but there is the possibility of encountering subterranean cultural materials during the planned construction activities. Figure 6 is a map showing previously identified archaeological sites near the area of potential effects.

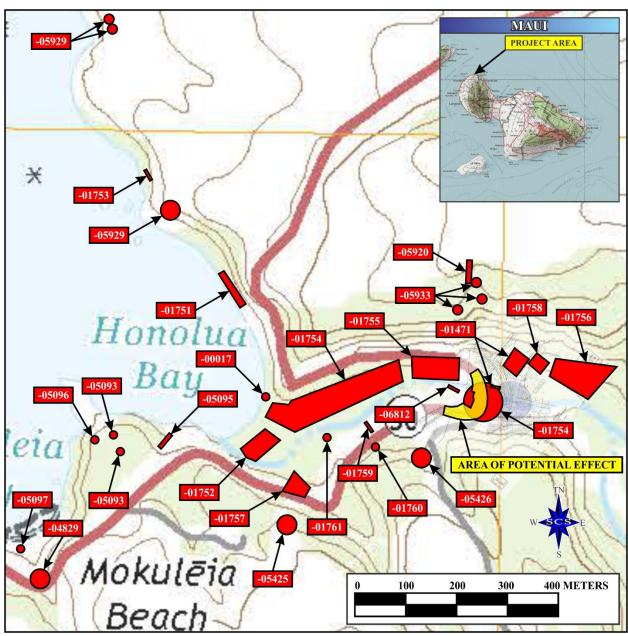


Figure 6: Archaeological sites documented in the vicinity of the area of potential effects

Possible findings may include subterranean remnants of Pre- or Post-Contact agriculture and habitation, such as tools, fire pits, and midden. Although the project area is not located on soils commonly used for Pre-Contact burials, the (unlikely) possibility of encountering such remains could not be ruled out.

## MONITORING CONVENTIONS AND METHODS

Monitors will adhere to the guidelines outlined in HAR §13-279-4 and the following requirements:

- 1. On-site, full time archaeological monitoring will be conducted for ground-disturbing activities during the proposed project. It is the responsibility of the Archaeological Principal Investigator, the HDOT, and the FHWA to ensure that there is at least one archaeologist monitoring each ground disturbing activity. A minimum of one archaeologist qualified under the Secretary of the Interior (SOI) professional standards for archaeology and permitted to conduct archaeology in the State of Hawaii will be on site during ground disturbing work. He or she will participate in plan reviews, meetings, and field visits regarding the project work when there are archaeological concerns. It is the responsibility of the HDOT and the FHWA to ensure that the archaeological firm contracted to conduct archaeological monitoring during the project provides the required staffing and is equipped with sub-meter accurate GPS equipment prior to the start of work.
- 2. If significant deposits or features are identified and additional field personnel are required, the archaeological consultants conducting the monitoring will notify the contractor or representatives before additional personnel are brought to the site.
- 3. A minimum of one qualified archaeologist will monitor each ground-altering activity within the area of potential effects.
- 4. If non-burial cultural deposits and/or features are identified, the archaeologist will have the authority to temporarily suspend construction, and the deposits or features will be identified, documented, and assessed for significance. The SHPD History and Culture Branch and the Archaeology Branch will be consulted on appropriate documentation and assessment prior to work continuing in the vicinity of the find. To comply with the Section 106 historic preservation review process FHWA will notify SHPD and consulting parties and comply with the requirements of 36 CFR 800.13. Documentation will include collecting geospatial data via a global positioning system (GPS) to plot the location and record it on a site map. Geospatial data will be collected at sub-meter accuracy to record significant historic properties. Documentation will also include (1) photography with legible scale and north arrow illustrating the deposits or features in plan view and profile view, (2) recording of stratigraphy using USDA Soil Survey Manual terminology and attributes and Munsell soil colors, and (3) plotting and collection of artifacts and soil samples.

- 5. All artifacts encountered will be documented *in situ* when possible, in scaled stratigraphic and/or plan view drawings, and photographed in the field with a legible scale and north arrow. The location of the find will be documented using a GPS device with submeter accuracy and recorded on project plans. All artifacts will be collected by the archaeologist and labeled in the field with provenience information and the date of the find, at minimum. Stratigraphic profiles will measure a minimum of 2 m across. Profile walls, and trench floors will be cleaned using a hand trowel prior to documentation, unless entering the excavated area poses a threat to safety, in which case the archaeologist will document the reason in their field notes. Construction work and/or back-filling of excavation pits or trenches will occur in the location of find only after all archaeological documentation has been completed. Former A-horizons will be sampled if archaeological or cultural materials are observed. Sampling will be conducted manually and sampling methods will be determined in consultation with the SHPD Archaeology Branch.
- 6. When additional data may be gleaned from exposed stratigraphy, soil sampling may occur using standard archaeological methods appropriate to the type of data to be analyzed. All data collection will be overseen in the field by an archaeologist meeting the Secretary of the Interior's qualifications for archaeological professionals
- 7. Documentation of stratigraphy will be gathered across a scaled grid of the project area, resulting in even representation of the stratigraphy within the project area. Stratigraphy will be recorded and photographed with north arrow and legible scale. These locations will also be recorded and represented on a current USGS topographic quadrangle map. The profiles will measure a minimum of 2 m across. Both vertical and horizontal scales will be recorded. The locations from where stratigraphy as well as any *in situ* finding are exposed and documented will be recorded using a handheld GPS unit with submeter accuracy. The location from which the GPS data is gathered will also be recorded with the archaeologist's field notes and provided in the archaeological monitoring report. For example, all GPS points may be taken from the northern most corner of an exposed stratigraphic profile.
- 8. In the event that human remains (*in situ* burial or isolated, displaced skeletal elements) are inadvertently encountered, all work in the immediate area of the find will cease, the area and human remains will be secured, and the archaeologist will immediately notify the police, SHPD (archaeologist and burial sites specialist staff), and the island burial council. Treatment of the human remains (including archaeological documentation) shall be in accordance with Hawaii Revised Statutes §6E-43.6, Hawaii Administrative Rules §13-300-40, and SHPD directives. Work will resume in the area of the inadvertent find only following written approval from SHPD.

- 9. To ensure that contractors and the construction crew are aware of the stipulations required in this Archaeological Monitoring Plan and possible site types to be encountered on the parcel, the archaeologist will conduct a brief coordination meeting between the construction team and monitoring archaeologist prior to initiation of the project. The construction crew will also be informed as to the possibility that human burials and/or cultural deposits or features could be encountered and how protection and mitigation should proceed if they observe such remains. All on-site personnel must receive the briefing prior to starting work on the project. The archaeological contractor, in coordination with HDOT and the construction contractor, will maintain a log of all project personnel who have received the briefing. At this briefing the monitor will emphasize his or her authority to temporarily halt construction and will state that all finds (including objects 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 to conduct onsite archaeological monitoring during all ground disturbance activities. It is the responsibility of the HDOT, the FHWA, the Archaeological Principal Investigator, and the on-site archaeologist(s) to ensure proper coordination so that the necessary number of archaeologists are on site each day. A minimum of one archaeologist shall directly monitor each ground disturbing activity.
- 10. The archaeologist will provide all coordination with the contractor, HDOT, SHPD, and any other groups involved in the project. The archaeologist will coordinate all monitoring and sampling activities with the safety officers for the contractors to ensure that proper safety regulations and protective measures meet compliance. Close coordination will also be maintained with construction representatives in order to adequately inform personnel of the possibility that open archaeological units or trenches may occur in the project area.
- 11. As necessary, verbal and written reports will be made to SHPD and any other agencies as requested.

## LABORATORY ANALYSIS

All non-burial artifacts and samples will undergo analysis at the SCS laboratory in Pukalani, Maui. Photographs, illustrations, and all paper and electronic documents will be curated at the laboratory of the archaeological consultants conducting the monitoring. All collected artifacts and midden samples will be cleaned, sorted, counted, weighed (in metric), and analyzed (in both qualitative and quantitative data), with all data recorded on standard laboratory forms. Midden samples will be minimally identified to major class (e.g., bivalve, gastropod mollusk, echinoderm, fish, bird, and mammal). Tables and text discussing the artifact and sample results will be provided in an archaeological monitoring report meeting the requirements of HAR §13-279-5. Digital curation-quality photographs with scales of all diagnostic artifacts will be included in the archaeological monitoring report submitted to SHPD for review and acceptance.

Samples (wood charcoal, shell, non-human bone, *kukui* nut) identified as potentially suitable for dating from an undisturbed context (e.g., cultural layer, pit feature) shall be considered for radiocarbon dating in consultation with SHPD and the landowner. Prior to submittal, potential wood charcoal samples shall first be submitted to International Archaeological Research Institute, Inc. (IARII) for wood taxa identification. Only samples identified as short-lived endemic or Polynesian-introduced species will be selected for dating purposes.

All stratigraphic profiles and plan view maps of identified historic properties (e.g., sites, cultural layers, features) shall be drafted for presentation in the final report. Photographs of project work, including overviews, and of individual profiles, cultural layers, and features shall also be included in the final report.

## **CURATION**

If requested by the landowner, all collected non-burial materials will be curated in the SCS laboratory until a final disposition repository location is determined in consultation with the landowner and the SHPD. Storing and maintaining the artifact collection will include using appropriate curation methods and archival containers, under appropriate environmental conditions and physically secure controls. The handling and cleaning of the artifact collection will be conducted in such a manner to preserve it and the final repository will have the capability to provide adequate long-term curatorial services.

# **REPORTING**

All historic properties (both non-burial and burial) identified and/or further documented during the archaeological monitoring (e.g., cultural layer, pit features, buried walls) shall be assessed for site significance per HAR §13-275-6, Criteria a through e and will be assessed for eligibility to be listed in the National Register of Historic Places. Assessments will be conducted by a person or persons meeting the Secretary of the Interior Professional Qualification Standards. This information shall be included in the final report, along with an appropriate recommendation for future mitigation, if warranted.

Within 30 days of completion of archaeological monitoring fieldwork, SCS will submit for review and acceptance a brief archaeological monitoring letter report of findings as specified in HAR §13-282-3(f)(1). Afterward, an archaeological monitoring report meeting the requirements of HAR §13-279-5 will be submitted to SHPD for review and acceptance within 60 days.