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GOVERNOR OF  
HAWAII



**STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES**

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

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KAIHOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

December 19, 2018

**IN REPLY REFER TO:**

**LOG NO:** 2018.02656

**DOC NO:** 1812TGM04

Architecture, Archaeology

Meesa Otani  
Environmental Engineer  
Federal Highway Administration  
United States Department of Transportation  
300 Ala Moana Blvd., Rm 3-306  
Box 50206  
Honolulu, HI 96850  
Via Email: meesa.otani@dot.gov

Dear Ms. Otani:

**SUBJECT: National Historic Preservation Act (NHPA) Section 106 Review  
Request for Concurrence of No Adverse Effect Determination  
Honoapiilani Highway, Honolua Stream Bridge Rehabilitation  
Federal Aid Project No. BR-030-1(37)  
Honolua Ahupua'a, Lahaina District, Island of Maui  
TMK: (2) 4-1-001:010 (por.), 4-2-004:032 (por.)**

Thank you for the opportunity to comment on this request from the Federal Highway Administration (FHWA), in cooperation with the State of Hawai'i Department of Transportation (HDOR) for consultation and concurrence with the determination of no adverse effect for the proposed project to upgrade the existing Honolua Stream Bridge as a single lane bridge with a superstructure on the existing abutments, replacing the guardrails, end treatment connections, and deteriorated materials with new to match existing, and installing new signage and pedestrian, bike, and shoulder lanes.

The State Historic Preservation Division (SHPD) received this submittal on November 9, 2018. The submittal included maps of the APE, photographs of the resource, a project description, identification of historic properties, architectural description and condition assessment, a justification of the APE, and justification for the determination of effect. FHWA has evaluated and determined that this project is an undertaking as defined in 36 CFR 800.16(y) and that the Area of Potential Effects (APE) includes 1.0 acre of land.

The FHWA identified a total of three historic properties comprised of four features that are within the boundaries of the project APE. This includes a terrace (State Inventory of Historic Places [SIHP] No. 50-50-10-1471 Feature 12), a wall, Honolua Bridge (SIHP 50-50-10-1754 Feature 6 and Feature 11), and a water diverting wall located along the east side of Honolua Stream (SIHP 50-50-10-6812). All three sites were determined eligible for listing on the National Register of Historic Places (NRHP) through consultation with the SHPD.

An archaeological inventory survey (AIS) was conducted for the proposed project, but involved a pedestrian survey only. The SHPD letter accepting the AIS (FHWA's Exhibit H; SHPD Log No. 2014.03793, Doc. No. 1502MD36) indicates the AIS report states archaeological monitoring may be appropriate during future work involving the proposed project.

The significant historic character-defining features of the Honolulu Bridge will be retained and the new features shall match the old in design, color, texture, and other visual qualities. The proposed project follows Secretary of Interior Standards for Rehabilitation and, therefore, will not affect the design, workmanship, materials, location, setting, association and feeling of the historic structure.

Pursuant to 36 CFR 800.11(e)(4) and 36 CFR 800.11(e)(5), the FHWA's letter provides a description of the undertakings effects on the Honolulu Bridge (SIHP 50-50-10-1754 Feature 11) and an explanation of why the criteria of adverse effect were found inapplicable, including conditions or future actions to avoid, minimize, or mitigate adverse effects to the Honolulu Bridge. The **SHPO seeks information** on how the undertaking will affect the other historic properties identified in the APE (SIHP 50-50-10-1754 Feature 6, SIHP 50-50-10-6812, and SIHP 50-50-10-1471 Feature 12), why the criteria of adverse effect were found inapplicable with regard to these properties, and conditions or future actions to avoid, minimize, or mitigate adverse effects to these historic properties. Therefore, the State Historic Preservation Office (SHPO) **does not concur** with the FHWA's determination of no adverse effect.

Additionally, the AIS did not include subsurface archaeological investigations. The SHPO recommends archaeological monitoring to be conducted under an SHPD-accepted Archaeological Monitoring Plan during ground disturbing activities to identify, as well as minimize or avoid effects to, any previously unidentified subsurface historic properties that may be encountered during project work.

Please contact Susan Lebo, Archaeology Branch Chief, at (808) 692-8019 or at [Susan.A.Lebo@hawaii.gov](mailto:Susan.A.Lebo@hawaii.gov) regarding archaeological resources, or Tanya Gumapac-McGuire, Architectural Historian, at (808) 692-8022 or at [Tanya.Gumapac-McGuire@hawaii.gov](mailto:Tanya.Gumapac-McGuire@hawaii.gov) regarding architectural resources or this letter.

Aloha,

*Susan A. Lebo*

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

cc: Colleen Suyama, [Colleen@munekiyohiraga.com](mailto:Colleen@munekiyohiraga.com)  
Kevin Ito, [kevin.ito@hawaii.gov](mailto:kevin.ito@hawaii.gov)  
Paul Arita, [parita@atahawaii.com](mailto:parita@atahawaii.com)  
Barbara Shideler, [bss@masonarch.com](mailto:bss@masonarch.com)

DAVID Y. IGE  
GOVERNOR OF  
HAWAII



**STATE OF HAWAII  
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STATE HISTORIC PRESERVATION DIVISION  
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ROBERT K. MASUDA  
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M. KALEO MANUEL  
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AQUATIC RESOURCES  
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ENGINEERING  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
KAHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

April 14, 2021

Meesa T. Otani, Environmental Engineer  
Federal Highways Administration  
U.S. Department of Transportation  
300 Ala Moana Boulevard, Room 3-306  
Box 50206  
Honolulu, Hawai'i 96850  
Email: Meesa.Otani@dot.gov

IN REPLY REFER TO:  
Project No.: 2019PR31792  
Submission No.: 2019PR31792.001  
Log No.: 2019.02531  
Doc. No.: 2104SH08  
Archaeology

Dear Meesa Otani:

**SUBJECT: National Historic Preservation Act (NHPA) Section 106 Review –  
Continued Consultation and Request for Concurrence with the Effect Determination  
Honoapiilani Highway, Honolua Stream Bridge Rehabilitation  
Ref. No. HDA-HI, Federal Aid Project No. BR-030-1(37)  
Honolua Ahupua'a, Lahaina District, Island of Maui  
TMK: (2) 4-1-001:010 por., and (2) 4-2-004:032 por.**

The State Historic Preservation Division (SHPD) received a letter dated November 14, 2019 from the Federal Highway Administration (FHWA) to provide additional information requested by the SHPD on December 19, 2019 (Ref. HDA-HI; SHPD Log No. 2018.02656; Doc. No. 1812TGM04) and to request the State Historic Preservation Officer's (SHPO's) concurrence with the effect determination for the Honoapiilani Highway Honolua Stream Bridge Rehabilitation project on the island of Maui. The SHPD received this submittal on November 15, 2019.

The proposed Hawai'i Department of Transportation (HDOT) project will receive funding from the Federal Highways Administration (FHWA) and has been determined a federal undertaking as defined in 36 CFR 800.16(y). The proposed project is subject to compliance with Section 106 of the NHPA.

A total of four historic properties were identified within the Area of Potential Effects (APE). This includes the Honolua Stream Bridge and State Inventory of Historic Places (SIHP) No. 50-50-10-1754 (Feature 6), SIHP No. 50-50-10-6812, and SIHP No. 50-50-10-1471 (Feature 12). In the December 19, 2018 letter, the SHPO requested information on how the undertaking will affect SIHP No. 50-50-10-1754 (Feature 6), SIHP No. 50-50-10-6812, and SIHP No. 50-50-10-1471 (Feature 12).

SIHP 50-50-10-1754, Feature 6: This is a discontinuous basalt wall paralleling the north side of Honolua Stream approximately 8 meters from the north bank that is associated with the bridge. This wall was documented by Moore (1974) and Perzinski and Dega (2014). The wall was determined significant per HAR §13-275-6 and eligible for listing on the National Register of Historic Places (NRHP) under Criterion D.

SIHP 50-50-10-6812: This is a water diversion wall built along the north bank of Honolua Stream, just west (less than 50 m) from the bridge. According to Perzinski and Dega (2014), the wall appears to be an erosion control structure to prevent the outside bend of the bank from further erosion. The wall measures approximately 18 meters in length with a maximum height of 1.5 meters (up to 5 courses) and is constructed of basalt cobbles and boulders that abut the north side of the stream. The wall appears to have been built to prevent Honolua Stream from meandering into the valley and was recorded as being in good condition (Perzinski and Dega 2014:30). This site was

assessed as significant per HAR §13-275-6 and eligible for listing on the National Register of Historic Places (NRHP) under Criterion D.

SIHP 50-50-10-1471, Feature 12. SIHP 50-50-10-1471, Honua'ula Heiau was documented during a survey conducted by Bishop Museum for Maui Land and Pineapple Co. Ltd. (Moore: 1974) Perzinski and Dega states that according to the report, the *heiau* measures approximately 128 meters by 60 meters. It was recorded as a complex series of walls, platforms, and enclosures. The Bishop Museum Site number is D14-5 and was deemed in "an excellent state of preservation and offers very good opportunity for further research" (Moore 1974:6). The *heiau* was re-investigated during an Archaeological Inventory Survey conducted by Scientific Consultant Services in July 2002 and a preservation plan was submitted in August of the same year (Dega 2002). Survey results deduced that the area was in permanent use for at least the last 500 years (Tome *ibid.* 2002: 50). According to Perzinski and Dega (2014) SIHP 50-50-10-1471, Feature 12 is an earth and basalt agricultural terrace located on the north side of Honolua Stream and situated approximately 4 meters east of Honoapi'ilani Highway on its western extent. The Perzinski and Dega AIS states the terrace wall is constructed of waterworn basalt and at least three waterworn aggregate boulders indicating an historic date for construction. The surface of the terrace is strewn with cobbles to a maximum width of 2.55 meters. Perzinski and Dega opine, "Though the feature retains the same site designation as Honua'ula Heiau, it is in no way, other than spatially, associated with it" (Perzinski and Dega 2009:18). FHWA states the feature was recorded and evaluated three times [Moore (1974), Tome *et al.* (2002), and Perzinski and Dega (2014)]. The terrace has been assessed as significant per HAR §13-275-6 and eligible for listing on the National Register of Historic Places (NRHP) under Criterion D. Tome *et al.* (2002) recommended no further work for the feature.

At this time, the SHPD opines SIHP 50-50-10-1754 and possibly SIHP 50-50-10-6812, depending on its period of significance, should be re-assessed for context, integrity, and significance by a person or persons qualified under the Secretary of Interior Standards for Architecture, Architectural History and/or historic Architecture, should any future projects be proposed that may impact these sites. The context of SIHP 50-50-10-1471, Feature 12 may also warrant re-evaluation should future projects be proposed that might impact this site.

FHWA states that project improvements have been designed to avoid Site 50-50-10-1754 (Feature 6), Site 50-50-10-6812, and Site 50-50-10-1471 (Feature 12). FHWA has committed to interim protection measures that will be implemented to ensure the sites are not inadvertently impacted during construction. In an email dated April 12, 2021 SHPD requested additional information regarding the proposed interim protection measures. HDOT responded stating, of the three archaeological sites/features, only one will be within 30 feet of the construction, SIHP 50-50-10-1754. Therefore, a construction fence will be provided as a buffer for SIHP 50-50-10-1754, Feature 6 on the makai side of the site. The construction fence will provide a 12.74-foot-wide buffer; the fence will be approximately 4' in height made of orange mesh with wooden/rebar stakes. The location of the construction fence will be noted on the construction drawings to be at the edge of the leased construction parcel. (Email Correspondence; Stephanie Hacker [SHPD] and Andrew Hirano [HDOT]).

An archaeological inventory survey (AIS) was conducted for the proposed project but involved a pedestrian survey only. The SHPD letter accepting the AIS (SHPD Log No. 2014.03793, Doc. No. 1502MD36) notes the AIS report states archaeological monitoring may be appropriate during future work involving the proposed project. In a previous letter, the SHPO recommended archaeological monitoring to be conducted under a SHPD-accepted Archaeological Monitoring Plan (AMP) during ground disturbing activities to identify, as well as minimize or avoid effects to, any previously unidentified subsurface historic properties that may be encountered during project work (SHPD Log No. 2018.02656, Doc. No. 1812TGM04). The FHWA has committed to preparing and submitting an AMP for SHPD's review and approval.

The significant historic character-defining features of the Honolua Bridge will be retained and the new features shall match the old in design, color, texture, and other visual qualities. The proposed project follows Secretary of Interior Standards for Rehabilitation and, therefore, will not affect the design, workmanship, materials, location, setting, association and feeling of the historic structure.

FHWA is requesting SHPO's concurrence with the determination of, *no adverse effect*, for the Honoapiilani Highway, Honolua Stream Bridge Rehabilitation project. **The SHPO concurs** with the effect determination based on FHWA's commitment to 1) follow Secretary of Interior's Standards for Rehabilitation for the Honolua Stream Bridge, 2) to avoid the other three historic properties by implementing interim protection measures to ensure the

Meesa Otani  
April 14, 2021  
Page 3

sites are not inadvertently impacted during construction, and 3) to conduct archaeological monitoring for identification as well as to provide the opportunity to avoid, minimize, and or mitigate impacts to any subsurface archaeological resources within the APE during the project.

Please submit a draft AMP meeting the requirements of HAR §13-279-4 for SHPD review and acceptance prior to the start of work. The AMP also shall include the proposed measures to be implemented during project work to avoid impact to Site 50-50-10-1754 (Feature 6), Site 50-50-10-6812, and Site 50-50-10-1471 (Feature 12).

The FHWA and HDOT are the offices of record for this undertaking. Please maintain a copy of this letter with your environmental review record for this undertaking.

Please contact Stephanie Hacker, Historic Preservation Archaeologist IV, at [Stephanie.Hacker@hawaii.gov](mailto:Stephanie.Hacker@hawaii.gov) or at (808) 692-8046 for matters regarding archaeological resources or this letter.

Aloha,

*Alan Downer*

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

cc: Andrew Hirano, HDOT ([Andrew.j.Hirano@hawaii.gov](mailto:Andrew.j.Hirano@hawaii.gov))  
Misako Mimura, HDOT ([Misako.k.Mimura@hawaii.gov](mailto:Misako.k.Mimura@hawaii.gov))

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

**SYLVIA LUKE**  
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



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

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

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

**RYAN K.P. KANAKA'OLE**  
FIRST DEPUTY

**DEAN D. UYENO**  
ACTING DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
BUREAU OF CONVEYANCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT  
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KAHOOLAWE ISLAND RESERVE COMMISSION  
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STATE PARKS

June 7, 2024

Edwin H. Sniffen, Director  
State of Hawai'i Department of Transportation  
869 Punchbowl Street  
Honolulu, Hawai'i 96813-5097  
Email Reply to: Andrew.j.Hirano@hawaii.gov

IN REPLY REFER TO:  
Project No.: 2019PR31792  
Doc. No.: 2405SH09  
Archaeology

Richelle M. Takara, Division Administrator  
U.S. Department of Transportation  
Federal Highway Administration  
300 Ala Moana Blvd, Rm 3-229  
Box 50206  
Honolulu, Hawaii 96850  
Email Reply to: Richelle.Takara@dot.gov  
Electronic Transmittal Only, No Hard Copy to Follow

Dear Edwin Sniffen and Richelle Takara:

**SUBJECT: National Historic Preservation Act (NHPA) Section 106 Review –  
Honoapi'ilani Highway, Honolua Stream Bridge Rehabilitation  
Federal-Aid Project No. BR-030-1(37)  
Archaeological Monitoring Plan  
Honolua Ahupua'a, Kā'anapali District, Island of Maui  
TMKs: (2) 4-1-001:010 por. and (2) 4-2-004:032 por. (Honoapiilani Highway ROW)**

The State Historic Preservation Division (SHPD) received a draft archaeological monitoring plan (AMP) titled, *Archaeological Monitoring Plan for the Honoapi'ilani Highway, Rehabilitation Of Honolua Bridge Project, Honolua Ahupua'a, Lāhainā District (Kā'anapali Moku), Island of Maui* TMK: (2) 4-1-001:010 por.; (2) 4-2-004:032 por. (Jin and Dega, August 2022) in support of the State of Hawai'i Department of Transportation's (HDOT's) Honoapiilani Highway, Honolua Stream Bridge Rehabilitation project. The SHPD received this submittal on August 26, 2022 (HICRIS Submission No. 2019PR31792.006). The SHPD received and reviewed two previous drafts of the AMP; SHPD last requested revisions to the plan on August 17, 2022 (HICRIS Submission No. 2019PR31792.005), and received the current version on August 26, 2022, along with a document that outlines the revisions made.

The proposed HDOT project will receive funding from the Federal Highway Administration (FHWA) and is therefore a federal undertaking as defined in 36 CFR 800.16(y); the FHWA determined the proposed project is subject to compliance with Section 106 of the NHPA. Pursuant to the Programmatic Delegation of Authority (May 2016), the FHWA delegated Section 106 consultation to HDOT. The project is also subject to historic preservation review under Hawai'i Revised Statutes (HRS) §6E-8 as it will be carried out by a state agency. The SHPD received the HDOT's initiation of the HRS §6E historic preservation review process and a request for the SHPD's concurrence with the HDOT's effect determination (HICRIS Submission No. 2019PR31792.007).



The State Historic Preservation Officer (SHPO) concurred with the FHWA's Section 106 effect determination of *no adverse effect* based on FHWA's commitment to 1) follow Secretary of Interior's Standards for Rehabilitation for the Honolulu Stream Bridge, 2) to avoid the other three historic properties by implementing interim protection measures to ensure the sites are not inadvertently impacted during construction, and 3) to conduct archaeological monitoring for identification as well as to provide the opportunity to avoid, minimize, and or mitigate impacts to any subsurface archaeological resources within the APE during the project. Therefore, the draft AMP was received for SHPD review and approval.

The proposed project will be located at the existing bridge crossing Honolulu Stream, approximately 4 miles north of Kapalua. The Area of Potential Effects (APE) is defined as the area that extends from the existing Honolulu Bridge along Honoapiilani Highway, located approximately between mile post markers 32.40 and 32.51 and comprises approximately 1.0 acre. The project area extends from the bridge in the following directions: 250 feet along Honoapiilani Highway in the northwest direction, 275 feet along Honoapiilani Highway in the southwest direction, 12 feet in the mauka direction, and 120 feet in the makai direction.

The project includes rehabilitating the existing Honolulu Stream Bridge including changes to the guardrail and end treatment connections as well as the installation of signage and new striping. The rehabilitation of the existing bridge consists of the structure remaining 18-foot wide and improved with one single 12-foot-wide travel lane, one 5-foot-wide shoulder for pedestrian and bike travel on the makai side, a 1-foot-wide shoulder on the mauka side, and bike rails on the makai bridge parapet. The current guardrail and end treatment connections will be upgraded. Additionally, HDOT proposes the construction of a temporary traffic detour road and a temporary bridge that would be constructed on the seaward portion of the highway ROW to allow the road to remain open during construction.

SHPD previously reviewed and accepted an archaeological inventory survey (AIS) report prepared by Scientific Consultant Services, Inc. (Perzinski and Dega, July 2014) for a Honolulu Bridge Replacement project (Log No. 2014.03793, Doc. No. 1502MD36). Scientific Consultant Services, Inc. (SCS) conducted the survey over a 1.6-acre project area and identified three historic properties assigned State Inventory of Historic Places (SIHP) Nos. 50-50-10-06812 (a water diversion wall), 50-50-10-01471, Feature 12 (an agricultural terrace), and 50-50-10-01754, Feature 6 (a wall associated with the bridge). SHPD agreed that all three sites are significant historic properties per HRS §6E under Criteria a and d and are eligible for listing in the National Register of Historic Places (NHPA) under Criteria A and D. In a letter dated November 14, 2019 (SHPD Log No. 2019.02531), the FHWA stated that project improvements have been designed to avoid Site 50-50-10-1754, Feature 6; Site 50-50-10-6812; and Site 50-50-10-1471, Feature 12.

On October 27, 2021, SHPD received a submission from the FHWA continuing the NHPA Section 106 process and requesting the State Historic Preservation Officer's (SHPO's) concurrence with an effect determination of *no adverse effect* along with a draft of the subject AMP dated September 2021. The SHPO concurred with FHWA's effect determination of *no adverse effect* based on FHWA's commitments as listed above.

On February 24, 2022, SHPD received a revised draft of the AMP dated February 2022, however due to inconsistencies between the TMKs listed in the plan and in the Section 106 correspondence (which may be due to project changes), SHPD requested HDOT submit a list of the TMKs in the APE/project area and confirmation of the total acreage of the APE/project area. The SHPD also requested minor revisions to the AMP (Submission No. 2019PR31792.005). SHPD received the current draft of the revised AMP on August 26, 2022, however, SHPD did not receive the requested information from HDOT.

SCS produced the subject AMP for identification purposes in support of the subject project. The plan includes summaries of historic land use practices and previous archaeological investigations that have occurred in the vicinity of the project area. Additionally, the plan includes archaeological monitoring conventions to be implemented by the archaeological monitor during all ground disturbing work associated with the project.

The AMP meets the minimum requirements of HAR §13-279-4 and the SOI for Archaeological Documentation. **It is accepted.** Please send **two** hard copies of the document, clearly marked FINAL along with a copy of this letter and a text-searchable PDF version of the AMP to the Kapolei SHPD office, attention SHPD Library. Also, submit a text-searchable PDF copy of the final AMP to HICRIS Project No. 2019PR31792 using the Project Supplement option and send a text-searchable pdf copy to [lehua.k.soares@hawaii.gov](mailto:lehua.k.soares@hawaii.gov).

**SHPD hereby notifies HDOT** the AMP has been accepted.

Edwin H. Sniffen and Richelle M. Takara  
June 7, 2024  
Page 3

On May 1, 2024, the SHPD received a letter from the HDOT requesting the SHPD's concurrence with their HRS §6E effect determination (SHPD HICRIS Submission No. 2019PR31792.007). This concurrence request is currently under SHPD review.

**SHPD will notify** HDOT and FHWA when our office has concurred with the HRS §6E effect determination (SHPD HICRIS Submission No. 2019PR31792.007) and project initiation may begin.

Please contact Susan A. Lebo, PhD, Archaeology Branch Chief, at [Susan.A.Lebo@hawaii.gov](mailto:Susan.A.Lebo@hawaii.gov) for any questions regarding this letter.

Aloha,



Dawn N. S. Chang  
DLNR Chairperson  
State Historic Preservation Officer

cc: Kevin Ito, HDOT, [kevin.ito@hawaii.gov](mailto:kevin.ito@hawaii.gov)  
Lawrence Laus, HDOT, [lawrence.m.laus@hawaii.gov](mailto:lawrence.m.laus@hawaii.gov)  
Kyle Shinyama, Austin, Tsutsumi & Associates, Inc., [kshinyama@atahawaii.com](mailto:kshinyama@atahawaii.com)  
Gwendolyn, Rivera, Munekiyo Hiraga, [gwendolyn@munekiyohiraga.com](mailto:gwendolyn@munekiyohiraga.com)  
Mike Dega, SCS, [mike@scshawaii.com](mailto:mike@scshawaii.com)  
Barbara Shideler, Mason, [bss@masonarch.com](mailto:bss@masonarch.com)  
Trisha K. Watson, Honua Consulting, [watson@honuaconsulting.com](mailto:watson@honuaconsulting.com)  
Courtney Hymes, AECOM, [courtney.cacace@aecom.com](mailto:courtney.cacace@aecom.com)